

*Agencies*

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# Letter FW093

U.S. Army Corps of Engineers

Page 1

From: [White, Kaitlyn P. NWS](#)  
To: [FWLE](#)  
Cc: [Bennett, Matthew J. NWS](#)  
Subject: Federal Way Link Extension Draft EIS Comments (UNCLASSIFIED)  
Date: Wednesday, April 29, 2015 9:44:44 AM

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Classification: UNCLASSIFIED  
Caveats: NONE

Hi Erin,

FA1-1 [ Per the Cooperating Agency Designation dated 17 June 2013, I limited my review of the Federal Way Link Extension to work proposed within Waters of the U.S. I found that the level of effort and accuracy of the wetland and stream assessment is sufficient for planning purposes. The Corps anticipates receiving a formal Delineation Report and refined Mitigation Plan concurrent with the JARPA submittal for this project.

Please let me know if you have any questions.

Regards,

Kaitlyn White  
Project Manager, Regulatory Branch  
U.S. Army Corps of Engineers  
Seattle District  
(206) 316-3156

Classification: UNCLASSIFIED  
Caveats: NONE

## *Response to Comment FA1-1*

Thank you for confirming that our assessment work related to the Waters of the U.S. is sufficient for planning purposes. Sound Transit expects to submit a formal Delineation Report, Mitigation Plan, and JARPA after the Sound Transit Board selects a project alternative to build and FTA issues a Record of Decision.

*Response to Comment FA2-1*

Please see response to Common Comment 11 in Table 9-6 of Chapter 9 of the Final EIS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

May 26, 2015

Mr. Richard Krochalis, Regional Administrator  
Federal Transit Administration, Region 10  
915 Second Avenue, Suite 3142  
Seattle, Washington 98174-1002

Mr. Perry Weinberg, Director  
Office of Environmental Affairs and Sustainability  
Sound Transit  
401 South Jackson Street  
Seattle, Washington 98104-2826

Dear Mr. Krochalis and Mr. Weinberg:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Federal Way Link Extension (EPA Region 10 Project Number 12-0058-FTA). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We appreciate your efforts to involve and inform us throughout the NEPA process.

Sound Transit proposes to expand the regional light rail transit system south from SeaTac to Federal Way, Washington. The proposed extension would be within the cities of SeaTac, Des Moines, Kent, and Federal Way in King County. The 7.6 mile long corridor generally parallels SR 99 and I-5 along a topographic ridge between Puget Sound and the Green River Valley. In addition to the No Action Alternative, there are four action alternatives, each with between four and nine station or alignment options. The alignment alternatives, which include at-grade, trench, and elevated light rail, are:

- The SR 99 route, which includes three stations, five station location options, and four potential additional stations;
- The I-5 route, which includes three stations, four station location options, and a landfill median alignment option;
- The SR 99 to I-5 route, which includes three stations, two station location options, two potential additional stations, and a landfill median alignment option; and
- The I-5 to SR 99 route, which includes three stations, two station location options, and two potential additional stations.

We support and commend FTA and Sound Transit for continued efforts to provide public transit via light rail for the Puget Sound region. We appreciate your dedication to delivering environmentally sensitive projects, providing service to disadvantaged populations, and supporting state, regional, and local growth strategies. The proposed alternatives provide an array of choices to fulfill these needs, including ways to maximize ridership, transit oriented development, and more walkable, livable communities.

FA2-1

Because a preferred alternative will not be identified until after the Final EIS is issued, we are rating the alternatives individually as follows:

- SR 99 Alternative: LO (Lack of Objections)
- I-5 Alternative: EC-2 (Environmental Concerns, Insufficient Information)
- I-5 to SR 99: EC-2 (Environmental Concerns, Insufficient Information)
- SR 99 to I-5 Alternative: EC-2 (Environmental Concerns, Insufficient Information)

An explanation of the EPA rating system is enclosed for your information.

Based on the information in the Draft EIS, we believe that the SR 99 alignment best avoids and minimizes environmental impacts while maximizing environmental benefits. We base this on the following features:

- **Ridership:** With 4 or 5 stations, SR 99 Alternative maximizes ridership over all other alternatives (p. 3-21), and does so also in the interim condition with the Kent-Des Moines station terminus (p. 3-24).
- **Residential displacements:** Only 36 residential displacements would occur compared to 106, 244, or 285 for the other proposed alternatives.<sup>1</sup>
- **Environmental justice:** The Camelot mobile home park along I-5 would not be displaced or impacted by additional noise, vibration, loss of vegetation/riparian/stream corridor and I-5 buffer, visual and construction impacts.
- **Transit Oriented Development potential:** Land uses along SR 99 are considered underutilized (developed at densities less than allowed under current zoning)<sup>2</sup> and generally auto-dependent in nature. High capacity transit would stimulate and support redevelopment that increases density and community cohesion, improves access, supports non-motorized travel, and better serves transit-dependent populations.
- **Consistency with State, Regional, and local growth strategies:** The goals and policies of the Growth Management Act, VISION 2040, Transportation 2040, and local comprehensive plans would be best supported by maximizing benefits with respect to the above criteria.
- **Hazardous materials:** The SR 99 Alternative would avoid the Midway Landfill, thereby maintaining the integrity of the remedy for this Superfund site.
- **Impacts to aquatic resources:** The SR 99 Alternative would avoid the need to pipe 800 feet of Bingaman Creek and would have the smallest percent increase in impervious surface among alternatives.

Our environmental concerns for the other three alternative alignments are based on their lower performance with respect to these same features. In addition, the I-5 and the SR-99 to I-5 alternatives would require relocation and/or piping of 800 feet of Bingaman Creek in the stream's upper reach. This is a permanent impact, which is avoidable with selection of either the SR 99 or the I-5 to SR 99 Alternative. The need for more information pertains to the preliminary estimates of impacts to resources at this stage of project development and the lack of specific proposals for compensatory mitigation for any unavoidable impacts to aquatic resources. Because the project area is highly urbanized, the remaining natural areas provide important ecosystem functions. Therefore, we would encourage taking extra effort to avoid further impacts to the extent, structure, diversity, and integrity of these natural

<sup>1</sup> DEIS, p. 4.1-1.  
<sup>2</sup> DEIS, p. 4.2-1.

**Response to Comment FA2-2**

The Final EIS describes and analyzes the Preferred Alternative identified by the Sound Transit Board of Directors after publication of the Draft EIS. It includes more information about the environmental impacts of and mitigation for all alternatives than the Draft EIS did.

**Response to Comment FA2-3**

EPA's preference for the SR 99 Alternative has been noted. Sound Transit refined the design for the Preferred Alternative since the Draft EIS and continues to work to minimize its impacts. Please see responses to Common Comment 1 regarding ridership and TOD potential, and Common Comment 3 regarding displacement.

Chapter 7, Environmental Justice, describes potential impacts on minority and low-income populations. Appendix D4.2 describes the project's consistency with plans and policies. Chapter 8, Alternatives Evaluation, includes a comparison of alternatives and shows the trade-offs between alternatives, including ridership, cost, and environmental impacts. A geotechnical investigation at the Midway Landfill completed since the Draft EIS indicates that the Preferred Alternative can be constructed without damaging the cap or stormwater collection system at the landfill. The Final EIS evaluates keeping Bingaman Creek in an open channel both north and south of S 288th Street for the Preferred Alternative.

areas, particularly those of highest ecological value, such as McSorley Creek/WDFW biodiversity corridor/wetland/forest complex, Redondo and Bingaman Creeks, and the forested corridor along I-5. We recommend that the Final EIS provide more specific information regarding impacts and mitigation to inform decision making.

**Station Options:**

- FA2-5 • Regarding the two potential additional stations for the SR 99 Alternative, at S. 216<sup>th</sup> we recommend selecting the S. 216<sup>th</sup> East station option rather than the West option due to its lower impacts to vegetation. At S. 260<sup>th</sup>, we recommend either not having a station, or choosing the west option due to its lesser wetland impacts. Both options would cross McSorley Creek; the East option would have additional impacts on McSorley Creek wetlands and forest, which are avoidable with the West option.
- FA2-7 • At the Kent/Des Moines station - if a station option is selected, we recommend either the SR 99 Median Option or the SR 99 East Option. However, SR 99 East Option would have 0.6 acres less vegetation impacts, and is therefore preferred.
- FA2-8 • At S. 272<sup>nd</sup> Redondo, we recommend selecting the standard station and avoiding the trench option due to its greater wetland and vegetation impacts, lower TOD potential, and increased residential and employment displacements.
- FA2-9 • At Federal Way, we support use of either the Federal Way Transit Center Station or the Federal Way SR 99 station option.

**Hazardous Materials – Midway Landfill**

We appreciate Sound Transit’s efforts to coordinate with agencies regarding the Midway Landfill and the need to maintain the integrity of the site remedy. We have the following comments on the information contained in the Draft EIS:

- FA2-10 • In addition to considerations of waste compaction, the gas extraction system would likely be impacted. The City of Seattle, in conjunction with Ecology, has the technical expertise to determine how much impact this would have. The EIS should address this part of the landfill remedy.
- FA2-11 • Potential Permits and Approvals (ES-v): The EIS should indicate that approval from EPA and Ecology would be needed for the Midway Landfill option. The necessary documentation would either be an Explanation of Significant Difference to the Record of Decision or a Record of Decision Amendment. The Record of Decision should be cited: U.S. Environmental Protection Agency 2000. Record of Decision, Midway Landfill, Kent, Washington, September 6, 2000.
- FA2-12 • On page 4.12-10, the DEIS states that “Compaction of the waste would minimize the creation of new leachate pathways to groundwater in the long term.” We ask that this statement be removed, as the EPA is not aware of data to support this, and there may actually be increased leaching of contaminants during the compaction.

**Response to Comment FA2-4**

Sound Transit has coordinated with WSDOT, WDFW, and the Muckleshoot Indian Tribe regarding fish passage issues at Bingaman Creek. The project design in this area was adjusted to minimize impacts. As described in Sections 4.8, 4.9, and Chapter 5 of the Final EIS, the stream would be temporarily piped during construction and then restored to an open channel adjacent to and underneath the elevated guideway north and south of S 288th Street. Sound Transit and FTA continue to work with WSDOT, WDFW, and the Muckleshoot Indian Tribe to identify potential mitigation options. Sound Transit also conducted a more detailed assessment of upland habitat to determine the level of function provided by the habitat that would be impacted under each alternative (see Section 4.9 and Appendix G2, Ecosystems Technical Report, of the Final EIS).

**Response to Comment FA2-5**

Your support for the S 216th East Station Option has been noted. As described in Chapter 2, Alternatives Considered, funding has not been identified for this station.

**Response to Comment FA2-6**

Your preference for either not selecting a S 260th Station or selecting the S 260th West Station Option has been noted. As described in Chapter 2, funding has not been identified for this station.

**Response to Comment FA2-7**

The Sound Transit Board identified the I-5 Alternative with the SR 99 East Station Option as the Preferred Alternative. The Kent/Des Moines Station location was optimized to facilitate access to Highline College and enhance TOD development potential in the Midway area. Impacts on vegetation from this station would be similar to other stations along SR 99 and less than the Kent/Des Moines I-5 Station Option or At-Grade Station Option.

**Page 3 (continued)**

***Response to Comment FA2-8***

Your support for the S 272nd Redondo Station has been noted.

***Response to Comment FA2-9***

Your support for either the Federal Way Transit Center Station or the Federal Way SR 99 Station Option has been noted.

***Response to Comment FA2-10***

The gas extraction system in the Preferred Alternative footprint is closed and disconnected from the main gas collection system. Portions of the closed system may be avoided or may need to be removed during construction. This would be determined during final design when column placement is finalized, and in coordination with Ecology and Seattle Public Utilities.

***Response to Comment FA2-11***

Section 4.12.4 has been modified as requested. The Executive Summary has also been updated.

***Response to Comment FA2-12***

This statement has been removed.

- On page 5-67, we ask that the second paragraph be modified to read as follows: "Deed restrictions are currently in effect for the landfill site, and inclusion of the site within the Superfund program will lead to extensive regulatory involvement with the EPA and Ecology. An Explanation of Significant Difference to the Record of Decision or a Record of Decision Amendment would need to be made final prior to any activities that would disturb the landfill cap. These activities would involve designing, then cutting, removing, and replacing the cap in the areas where drilled shafts, waste removal, or compaction would occur. Environmental monitoring would take place to ensure worker and public health and safety while the landfill cap is open."

FA2-13

#### Climate change/greenhouse gas emissions

The DEIS indicates that the combined emissions from vehicle miles travelled and energy generation for operation of the FWLE would result in a net increase of 1,280 metric tons of CO<sub>2</sub>e per year (equivalent to the average energy consumed by 176 households) when compared to the No Build Alternative.<sup>3</sup> However, the Summary Table of Impacts and Mitigation<sup>4</sup> states that the GHGs with the FWLE build alternatives would be less than under the No Build Alternative. While this issue needs clarification, the former outcome appears congruent with Sound Transit's 2013 Sustainability Framework<sup>5</sup> Report, which shows a 3% increase in energy use per revenue mile, and a 2% increase in greenhouse gas emissions per revenue mile. In light of Sound Transit's commitment to sustainability, which embraces the need to reduce greenhouse gas emissions, we recommend that potential mitigation measures be discussed and commitments made to address this increase. Mitigation could include things such as onsite solar energy (e.g., solar panels on stations and/or parking lots), or using other renewable energy from offsite sources. Consider, too, adopting a zero net GHG emissions policy, and potentially buying carbon credits locally to offset emissions.

FA2-14

#### Construction Mitigation

The SR99 Alternative, in particular, would require construction within existing residential and commercial land uses thereby affecting a greater number of people with construction-related emissions, including air toxics. To reduce these effects, we recommend including additional construction mitigation measures, such as the three additional readily available mitigation measures listed on page 5-44 of the DEIS: use emission reduction technologies and practices for on and off road equipment/vehicles; implement construction engine idling restrictions; and locate construction equipment and truck staging areas away from sensitive receptors. Also, we recommend using only water to control dust.

FA2-15

<sup>3</sup> DEIS, p. 4.6-11.

<sup>4</sup> Table 7-2, p. 7-20.

<sup>5</sup> [http://www.soundtransit.org/Documents/pdf/about/environment/2014\\_SustainabilityProgressReport.pdf](http://www.soundtransit.org/Documents/pdf/about/environment/2014_SustainabilityProgressReport.pdf)

#### Response to Comment FA2-13

Text has been revised per additional coordination that occurred with EPA between the Draft and the Final EIS.

#### Response to Comment FA2-14

This section has been updated in the Final EIS and the project shows a decrease in CO<sub>2</sub>e emissions per year when VMT and energy consumption are combined. Mitigation for greenhouse gas emissions is not warranted.

Sound Transit's Sustainability Policy and Design Criteria Manual provide guidance and direction on incorporating sustainability in the project design throughout the design process. During Preliminary Engineering, Sound Transit is also using Envision, a third-party sustainable infrastructure rating system, to explore ways to improve design, access, energy use, water quality, materials, and construction practices.

#### Response to Comment FA2-15

Sound Transit will employ a full array of construction mitigation methods as needed to reduce localized impacts and as established through the permitting process with local jurisdictions and appropriate agencies.

Thank you for the opportunity to participate in the Federal Way Link Extension NEPA process. If you have questions or would like to discuss these comments, please contact me at (206) 553-1601 or at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or contact Elaine Somers at (206) 553-2966 or at [somers.elaine@epa.gov](mailto:somers.elaine@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure:

1. U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

*No Comments*

*No Comments*

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.

# Letter FW573

U.S. Department of the Interior

Page 1



## United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
620 SW Main Street, Suite 201  
Portland, Oregon 97205-3026

IN REPLY REFER TO:  
9043.1  
ER15/0234

*Electronically Filed*

May 26, 2015

Tralayne Myers  
Federal Way Link Extension Draft EIS Comments  
Sound Transit  
401 S Jackson Street  
Seattle, WA 98104

Dear Ms. Myers:

FA3-1 [ The Department of the Interior has reviewed the Draft Environmental Impact Statement for the Federal Way Link Extension, King County, Washington. The Department has no comments on the document at this time.  
We appreciate the opportunity to comment.

Sincerely,

Allison O'Brien  
Regional Environmental Officer

### *Response to Comment FA3-1*

Thank you for your letter stating that you have no comments on the Draft EIS at this time.

# Letter FW615

Federal Highway Administration

Page 1



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Washington Division

Suite 501 Evergreen Plaza  
711 South Capitol Way  
Olympia, Washington 98501-1284  
(360) 753-9480  
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<http://www.fhwa.dot.gov/wadiv>

June 2, 2015

HFO-WA.1/WA2470

Michael Harbour, Acting CEO  
Sound Transit  
401 S. Jackson St.  
Seattle, WA 98104

**Federal Way Link Extension  
FHWA Draft EIS Comments**

Dear Mr. Harbour:

The Federal Highway Administration (FHWA), in our role as a cooperating agency on the Federal Way Link Extension Project (FWLE), has reviewed the recently released Draft Environmental Impact Statement (DEIS). We would like to provide the following feedback as it relates to our upcoming decision and approval actions. In a letter dated October 3, 2014, the FHWA provided comments on the administrative DEIS and raised concerns about alternatives that involved the potential placement of light rail within Interstate 5 (I-5) right-of-way. The FHWA is pleased with the revisions that have been made in the DEIS, which addresses many of our previously stated concerns. However, the FHWA does have some remaining concerns that are detailed below.

**Interstate Safety**

The top priority of FHWA is to ensure that I-5 remains safe for all users. As you know, the right-of-way accommodation approval requires that FHWA make a public interest finding per 23 CFR §710.405 that the use of I-5 right-of-way does not impact the safety, operations, or maintenance of the Interstate. We are concerned that Interstate safety could be affected by future clear zone reduction and the effects of construction at Interstate interchange areas.

Clear Zone Impacts to I-5

FHWA has a signed Record of Decision for the SR 509 Extension Project that takes place within a portion of the proposed I-5 FWLE use. We remain concerned that the cumulative effects associated with the SR 509 Extension Project and the FWLE could reduce clear zone along portions of I-5, and ultimately impact safety or limit strategies for addressing future highway needs. If the preferred alternative is within the I-5 right-of-way, the FHWA continues to advocate for a light rail alignment that is at the outer limits of the right-of-way, unless there is a compelling reason to do otherwise. To address our concerns, we need to better understand the location of the FWLE within the sections of the SR 509 Extension Project, which includes the location in the median, and in areas where the light rail does not follow the outer limits of the I-5 right-of-way line. The FHWA sees an opportunity to move forward on this issue through further development of the I-5 Compatibility Report. If an I-5 Compatibility Report was created that sufficiently addressed the

FA4-1

## *Response to Comment FA4-1*

After the identification of the I-5 Alternative as the Preferred Alternative in July 2015, Sound Transit has continued to coordinate with FHWA and WSDOT regarding the design of the light rail in the I-5 right-of-way, as well as the relationship of the light rail alignment to the SR 509 Extension Project. FHWA, WSDOT, and Sound Transit have addressed design compatibility between the two projects through letters of understanding for specific areas in the corridor, in lieu of a project-wide Compatibility Report.

During development of the Final EIS, Sound Transit coordinated with WSDOT and FHWA on the appropriate traffic and safety analysis along I-5 and at ramp terminals. This approach was included in the *Final EIS Transportation Technical Analysis Methodology Overview and Updates* memo that both WSDOT and FHWA reviewed. The transportation analysis included in the Final EIS assessed the clear zone by conducting a predictive safety analysis. The analysis also addressed the traffic operations and safety on the interchange ramps and ramp terminals considering the signal systems and ramp design information such as sight distance, deceleration lengths, effective storage lengths, and alignment.

Section 4.3 of Appendix G1, Transportation Technical Report, presents a detailed queue length analysis for the No Build Alternative and Preferred Alternative. This analysis was completed using WSDOT-approved SimTraffic in conjunction with Synchro software. A detailed geometric assessment was completed to determine effective ramp queue storage lengths and was used to determine if queues on the I-5 ramps would extend onto the I-5 mainline in the study area. Chapter 5 of the Transportation Technical Report also documents a quantitative construction analysis that identified transportation-related impacts resulting from lane and/or road closures associated with FWLE construction.

**Page 1 (continued)**

Based on consultation with FHWA and WSDOT, an analysis of clear zone effects was completed for both operational and construction conditions, and a safety analysis was prepared based on the FWLE's potential to reduce or eliminate clear zone. The analysis of operational impacts can be found in Section 4.4 of Appendix G1, Transportation Technical Report, and is summarized in Section 3.5.4 of Chapter 3, Transportation, of the Final EIS. The analysis of construction impacts can be found in Section 5.5 of Appendix G1, Transportation Technical Report, and is summarized in Section 5.2.1 of Chapter 5, Construction, of the Final EIS.

To help decision-makers and the public understand potential impacts of an alignment within the undeveloped I-5 right-of-way, Sound Transit has assumed in the Final EIS that the guideway will generally follow the western limit of the interstate right-of-way while maintaining as straight an alignment as possible. This is to ensure that potential impacts on neighboring properties and land uses are disclosed as fully as possible given the current preliminary level of design. It also reflects the general practice of agencies with jurisdiction over interstate highways (in Washington state, the FHWA and WSDOT) to locate non-highway uses as far as possible from an existing highway.

Appendix J, Location of Preferred Alternative within I 5 Right-of-Way, recognizes that site-specific constraints along the undeveloped right-of-way exist and may require flexibility to adjust the location of the transit guideway to avoid or minimize impacts. Appendix J discusses changes in impacts that could occur from shifting the alignment, including impacts to the clear zone. It includes scenarios with and without the SR 509 Extension.

FA4-1

concerns of FHWA then we could provide concurrence on that document, thereby streamlining the latter stages of the FWLE NEPA process.

FA4-2

**Construction Impacts at I-5 Interchange Areas**

The FHWA is concerned that the effects of lane closures on local streets, increased traffic volumes due to construction activities, and potential changes to traffic flow patterns are not adequately addressed in the DEIS. We are particularly concerned with traffic back-ups that would potentially affect the operations and safety of Interstate off-ramps. The FHWA has enclosed a Comment Response Matrix that specifically identifies areas where additional analysis or clarification is needed. The FHWA requests that additional traffic and operational analysis be conducted to ensure that the proposed FWLE will not significantly impact the operations and/or safety of the I-5 mainline or entrance/exit ramps.

FA4-3

Since some of the proposed FWLE alternatives involve the removal of vegetation from areas within Interstate right-of-way, FHWA wants to make sure that Sound Transit (ST) and the Federal Transit Administration (FTA) are aware of recent updates that have been made to the Washington State Department of Transportation (WSDOT) Roadside Policy Manual. These updates are anticipated to become effective in August 2015 and include new requirements to mitigate impacts to beautification and landscape areas. There could be opportunities to further minimize vegetation removal within the I-5 right-of-way.

FA4-4

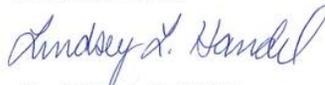
The FHWA would also like to make ST and FTA aware of recently released noise policy guidance for 23 CFR §772 that specifically relates to transit projects. This information is presented in an FAQ format and is available on the FHWA website.

FA4-5

The FHWA would like to thank ST and FTA for providing us with the opportunity to comment on the FWLE DEIS. We look forward to further collaboration as we progress through the NEPA process and hope that you will find this feedback beneficial. If you have any questions regarding this letter, or the enclosed comments, please contact me at [Lindsey.Handel@dot.gov](mailto:Lindsey.Handel@dot.gov) or (360)753-9550.

Sincerely,

DANIEL M. MATHIS, P.E.  
Division Administrator



By: Lindsey L. Handel, P.E.  
Urban Area Engineer

Enclosure

cc: Susan Fletcher, FTA; Dan Draais, FTA; Kent Hale, Sound Transit; Dylan Counts, WSDOT; Marsha Tolon, WSDOT; Greg Lippincott, WSDOT

**Response to Comment FA4-2**

Construction impacts on the transportation system were discussed in Chapter 5 of the Draft EIS. Sound Transit updated the Final EIS to include further information such as intersection level of service and roadway volume-to-capacity analysis for construction locations with lane and road closures and detour routes. This analysis included the relevant I-5 interchange areas with potential impacts. Please see response to comment FA4-1.

**Response to Comment FA4-3**

Sound Transit is aware of the updated WSDOT manual and refers to it in the discussion of visual mitigation measures in Section 4.5, Visual and Aesthetic Resources, in the Final EIS. Sound Transit will coordinate with WSDOT landscape staff to develop appropriate site-specific measures and offsite mitigation as needed. Section 4.5.4 of the Final EIS describes impacts on vegetation within WSDOT right-of-way and summarizes the applicable mitigation requirements per the WSDOT *Roadside Policy Manual*. Section J.2.4 of Appendix J, Location of Preferred Alternative within I 5 Right-of-Way, describes potential changes in visual impacts if the FWLE alignment is shifted closer to I-5 south of Kent/Des Moines Road.

**Response to Comment FA4-4**

The traffic noise analysis was prepared in accordance with FHWA and WSDOT criteria, and reflected FHWA noise policy guidance related to transit projects and 23 CFR Section 772 as appropriate.

**Response to Comment FA4-5**

Sound Transit continues to coordinate with FHWA through the NEPA process.

Federal Way Link Extension

FHWA Draft Environmental Impact Statement Comments – May 24, 2015

Page #	Section #	Comment
<b>Off-Ramp Queue Safety Analysis</b>		
FA4-6	4-70	Appendix E shows the results of the analysis performed by ST/FTA. FHWA believes that the methodology used for the analysis has oversimplified the issue and is not a true reflection of whether the project will create safety and operational issues at the three I-5 interchanges in the project study area. Appendix E does not include all relevant information such as the total ramp length and the calculated deceleration length necessary. Other safety considerations include horizontal alignment, which relates to adequate/inadequate sight distance, and ramp vertical grade. A long ramp with obstructed sight distance might pose a safety problem if the driver is not able to see the end of the queue with enough time to react and slow down. A discussion about how and why the queue lengths change with the various options would be helpful. This discussion should also examine the existing crash rates, and if the ramps already have a high rate, increasing the queue could further degrade safety. Additional information is needed before FHWA can agree that no mitigation is needed to address the increased queues that result from the project.
	3-44, 3-45	
<b>Kent Des Moines Interchange</b>		
FA4-7	Page 5-14	Appendix G - Transportation
		Page 5-14 of the Transportation Appendix shows I-5 Kent-Des Moines Road Southbound ramps as one of the potential primary access points to the temporary construction road. Without understanding where the access point(s) are, this could create a safety and/or operational issue on the ramp(s), SR 516, and possibly even SR 99 due its close proximity to I-5 with trucks entering/exiting the construction zone somewhere in the ramp area. This could cause a large speed differential between trucks and I-5 users, which reduces safety. The SB off ramp has the second highest crash rate out of the ramps in the study area. Table E-1 shows a queue length of 780' and an effective storage length of 1,200', which is 65% of the storage length. The operations at the SB ramps and SR 516, and SR 99 and SR 516 are already at LOS F, so this access point could exacerbate the delay.

**Response to Comment FA4-6**

Please see response to comment FA4-1.

**Response to Comment FA4-7**

Chapter 5 of the Transportation Technical Report (Appendix G1) includes additional quantitative traffic analysis of these ramps and discusses construction access points to the temporary construction road. Please see response to comment FA4-1.

FA4-7	<b>272nd Interchange</b>	
		We have multiple concerns with this interchange, particularly during construction activities. We did not find any traffic analysis done to evaluate traffic impacts during construction, and we believe it is highly likely that the some of the changes to the local transportation network during construction will lead to safety and operational impacts on I-5 mainline and ramps.
FA4-8	3-35	DEIS
		The DEIS states the road will be reconfigured for the station. The text does not describe what the changes will be. If the reconfiguration moves the location of the intersection of 26 <sup>th</sup> with 272 <sup>nd</sup> closer to the SB ramps (to the east), FHWA will need additional information to understand if the reconfiguration will cause any operational or safety impacts due to proximity to the ramps.
FA4-9	3-63, Table 3-17	DEIS
		The description of the potential transportation mitigation for the full length condition at I-5 NB ramps/S272nd Street is unclear. Is the proposed mitigation a left turn lane from eastbound 272 <sup>nd</sup> to northbound I-5?
FA4-10	Page 5-5	Appendix G – Transportation
		Up to 15 trucks per hour would access the construction areas, which will further reduce capacity on 272 <sup>nd</sup> St. due to trucks entering/exiting the construction zone, possibly needing flaggers.
FA4-11	Page 5-2	Appendix G – Transportation
		There will be trenching under S 272 <sup>nd</sup> St, which will further reduce capacity.
FA4-12	Table E-1	Appendix G - Transportation
		This table shows a queue length of 700' and an effective storage length of 1,175', which is 60% of the storage length. Without information on sight distance, we are not able to determine that this queue length will not create a safety concern.
FA4-13	Table 3-14 on Page 3-23	Appendix G – Transportation
		Off-ramp crash rates at 272 <sup>nd</sup> of 8.01 crashes/MVMT (NB off) and 3.19 crashes/MVMT (SB off) are shown. These are on the higher end out of all the ramps in the study area. Only three ramps in the study area have a higher rate than the NB off-ramp.
FA4-14		Appendix G – Transportation
		If the Star Lake P&R lot is completely closed during construction, less traffic will use 272 <sup>nd</sup> , which would help reduce vehicle delay, but the displacement of the P&R lot users might create other undisclosed traffic impacts.

**Response to Comment FA4-8**

The Final EIS provides more information regarding the project improvements along 26th Avenue S and at the intersection of 26th Ave S and S 272nd Street. In summary, the 26th Avenue S and S 272nd Street intersection would be improved and widened for additional turn lanes. It would not be shifted closer to the I-5 southbound ramp. Detailed LOS and delay information is provided for the reconfigured 26th Avenue S and S 272nd Street intersection in the Transportation Technical Report (Appendix G1).

**Response to Comment FA4-9**

The Final EIS updates and clarifies the mitigation descriptions. See Table 3-11 in Chapter 3, Transportation, for mitigation measures. The mitigation in this location is an additional left-turn pocket from the northbound I-5 off-ramp to westbound S 272nd Street. This left-turn lane would be in addition to the existing northbound shared left/through lane and right-turn-only lane.

**Response to Comment FA4-10**

The estimated 10 to 15 trucks per hour would only occur during periods of peak construction activities. The Final EIS assesses truck traffic impacts in Chapter 5, Construction. Sound Transit would prepare traffic control plans during final design for agency approval that address maintaining all modes of transportation.

**Response to Comment FA4-11**

Trenching under S 272nd would further reduce capacity on this roadway when lane closures occur. A quantitative construction traffic analysis for the Final EIS assessed impacts due to lane/road closures and assumed roadway capacity reductions. Please see responses to comments FA4-1 and FA4-2.

**Response to Comment FA4-12**

See response to comment FA4-6.

**Page 4 (continued)**

***Response to Comment FA4-13***

Relative crash rates have been confirmed for the Final EIS.

***Response to Comment FA4-14***

The Star Lake Park-and-Ride is currently about half full on weekdays. As discussed in Chapter 5 of the Final EIS, its users would be displaced if the park-and-ride were completely closed for construction, and would likely use nearby lots such as the Redondo Park-and-Ride.

FA4-15		General Comment	The significant reduction in capacity on 272 <sup>nd</sup> will lead to additional delay through the corridor and for traffic entering and exiting I-5. This delay could cause queues on 272 <sup>nd</sup> off ramps to back-up to mainline, which often leads to increased crashes. We need this area analyzed to better understand the potential construction impact.
<b>320th Station Option – P&amp;R connection to 25th</b>			
FA4-16	Page 4-36	Appendix G – Transportation	For the 320 <sup>th</sup> station option, access to 25 <sup>th</sup> would be modified so vehicles leaving the station could also use this road. Currently only buses are allowed to use this access point. Page 4-26 of the DEIS states up to 780 additional trips/day will be generated from the 320 <sup>th</sup> station option. The 25 <sup>th</sup> intersection at 320 <sup>th</sup> is very close to the I-5 SB on-ramp, so changing this restricted access would allow significant number of new trips on 25 <sup>th</sup> to access 320 <sup>th</sup> . Increasing the amount of traffic at this intersection does not appear to have been analyzed adequately given the LOS numbers in the document (Table 4-26 shows LOS of B(C) for this intersection). The analysis also does not appear to take into account the potential weaving that will result from this additional traffic. This proposal is likely to affect safety, and changing the access from the P&R lot to 25 <sup>th</sup> may require a limited access break through FHWA.
FA4-17	5-14, 5-20	Appendix G - Transportation	If Sound Transit plans to close Park & Ride facilities (Star Lake and Fed Way S 320 <sup>th</sup> ) then FHWA would expect mitigation. Analysis should be conducted that focuses on how P&R closure will impact I-5 mainline, ramp operations, and safety. Page 5-20 states that displaced [transit] riders would need to use FWTC, but analysis should also include impacts to highway P&R users (carpool, vanpool, etc.) since the FWTC P&R lot is at 99% capacity.
<b>Vegetation Removal</b>			
FA4-18	5-10	DEIS	The construction vehicle access road may be up to 30 feet. FHWA would like this footprint to be minimized to reduce visual impacts from vegetation removal within Interstate right-of-way.
	5-14	Appendix G - Transportation	
<b>Other Construction Impacts</b>			
FA4-19	4-36	Appendix G - Transportation	This section states that the elevated guideway, and related false work, could encroach over the I-5 shoulder and travel lanes in a few locations. We want to remind ST to be mindful of highway vertical clearance standards during construction.

**Response to Comment FA4-15**

See response to comment FA4-11.

**Response to Comment FA4-16**

With the S 320th Park-and-Ride Station Option, the Draft EIS incorrectly stated the 25th Avenue S access could be converted to allow non-bus traffic. The Final EIS assumes that 25th Avenue S would remain bus-only. Access to this park-and-ride for commuter vehicles would be from 23rd Avenue S. The intersection LOS analysis has been updated to account for the trips generated to/from the station.

**Response to Comment FA4-17**

The Star Lake and/or S 320th Park-and-Ride could be closed for construction. This could result in additional traffic along I-5 from the south to S 272nd Street or additional traffic on SR 99 between S 320th Street and S 272nd Street.

As discussed in Chapter 5 of the Final EIS, if the Star Lake Park-and-Ride is closed, vehicles would likely use nearby lots such as the Redondo Heights Park-and-Ride. This shift would not be expected to cause additional traffic on I-5 since vehicles would take the same I-5 ramps to access the Redondo Heights Park-and-Ride as they would to access the Star Lake Park-and-Ride. The shift in park-and-ride users to the Redondo Heights Park-and-Ride could cause additional traffic on SR 99 from users originating from the south or west.

If the S 320th Park-and-Ride were completely closed for construction, vehicles would likely use the Redondo Heights or Star Lake Park-and-Ride instead. This is not expected to significantly affect I-5 traffic since license plate surveys show that most of the users of the S 320th Park-and-Ride are from the residential areas of Federal Way to the west.

**Page 5 (continued)**

If both the Star Lake and S 320th park-and-rides were closed, there is sufficient capacity at Redondo Heights Park-and-Ride to accommodate users of both park-and-rides.

***Response to Comment FA4-18***

Sound Transit will continue to evaluate opportunities to reduce the project footprint in the I-5 right-of-way and to minimize impacts on vegetation. Much of the area cleared for the construction road would need to be permanently cleared of large trees in any event, to prevent these trees from posing a hazard to the overhead catenary lines, although smaller trees and shrubs would be replanted. Appendix J, Location of Preferred Alternative in the I-5 Right-of-Way, describes how impacts on vegetation could be reduced somewhat if the alignment were shifted to the east.

***Response to Comment FA4-19***

Text has been added to the Final EIS stating that highway vertical clearances would be maintained on I-5 during construction.

FA4-20	5-5	Appendix G - Transportation	What work would need to be done for temporary realignment of the ramps during the installation of the girders for the guideway bridges? More information is needed to understand whether there would be changes that would warrant an IJR.
FA4-21	5-6	Appendix G - Transportation	For the landfill median option, cast-in-place construction would require closing one or two lanes for up to 2 months or restriping travel lanes around the construction area. Comparatively, pre-cast option would have significantly less impacts to mainline travel lanes. When will FHWA and WSDOT know which construction method would be used?
<b>Other</b>			
FA4-22	3-32, 3-35, 3-45	DEIS	More traffic analysis is needed to understand how the new intersection at SR 99 and 236 <sup>th</sup> impacts traffic on SR 99 and if there are any safety impacts, especially with significantly more pedestrians crossing at the intersection.
FA4-23	3-34	DEIS	The text on this page discusses how WSDOT will perform maintenance work in areas where the light rail is on structure. There isn't a comparable discussion on maintenance expectations when the light rail is at-grade or trenched.
FA4-24	4-34 to 4-35	Appendix G - Transportation	
	6-11	DEIS	The Cumulative Effects section states that the FWLE project will require changes to the SR 509 project to maintain neighborhood access. Since we have an approved ROD, we need to understand what these changes would be before we will be able to approve a use of I-5 ROW currently approved for the future SR 509 as part of the SR 509 2003 ROD.

**Response to Comment FA4-20**

Construction would not require realignment of any I-5 ramps.

**Response to Comment FA4-21**

Sound Transit has not conducted additional design or assessment of cast-in-place versus pre-cast construction methods for the Landfill Median Alignment Option. If it is selected as part of the project to build, further design and analysis of construction methods would be completed in coordination with FHWA and WSDOT.

**Response to Comment FA4-22**

Please see Chapter 3, Transportation, of the Final EIS, which includes traffic analysis at this location as well as information about non-motorized and transit activity. Sections 4.4.2 and 4.6.4 of the Transportation Technical Report (Appendix G1) describe the safety analysis and pedestrian level of service analysis done for this station.

**Response to Comment FA4-23**

Sound Transit has identified sections of WSDOT right-of-way that would be isolated by at-grade or trench profiles of the Preferred Alternative. Sound Transit will coordinate with WSDOT on ownership and long-term maintenance of these properties.

**Response to Comment FA4-24**

Sound Transit has been regularly coordinating with both WSDOT and FHWA on any potential changes that could affect WSDOT's SR 509 Extension Project, the design of which is currently being reevaluated. The design for maintaining neighborhood access is not within the I-5 right-of-way.

# Letter FW583

Muckleshoot Indian Tribe Fisheries Division

Page 1

From: [Karen Walter](#)  
To: [FWLE](#)  
Subject: Federal Way Link Extension, Draft Environmental Impact Statement  
Date: Tuesday, May 26, 2015 4:13:30 PM

Dear Kent and Steve,

We have reviewed the Draft Environmental Impact Statement for the proposed Federal Way Link Extension project and the associated appendices. We offer the following comments in the interest of protecting and restoring the Tribe's treaty-protected fisheries resources:

TR1-1 Previously, we commented on this project twice; once just after the agency scoping meeting and again during the formal scoping process. We offered comments regarding potential stream crossings, noting that if there are any modified stream crossings, they should be replaced with culverts designed using WDFW's stream simulation design method. We further noted that for any culverts in the project area, the rail project and corridor should not preclude any future culvert replacement project using the stream simulation design criteria.

The Draft EIS did not discuss these comments and potential impacts and there is limited consideration in the Ecosystem Technical Report Appendix. Therefore, we are re-iterating these concerns that this project needs to ensure that it will not preclude the future replacement of existing fish passage barriers with stream simulation culverts throughout the project area. Some of these culverts are noted in the Ecosystem Technical Report; however, there are some inconsistencies between text in this report and Exhibits 3-1 through 3-3 regarding the extent and location of existing barrier culverts. A full comprehensive list of existing fish passage barriers appears to be lacking from the available information and should be completed before the FEIS is finalized. For example, it appears that the I-5 culvert conveying Bingaman Creek is a barrier as the stream data indicates that the stream is noted being 7-9 feet wide at the OHWM throughout its length; however, the culvert under I-5 is noted as 3 feet in diameter indicating that it is undersized for the bankfull conditions. Further information is needed to determine if this culvert is a barrier, including additional stream information as the stream is described as having sections of steep gradients and small cascades on the east side of I-5 without providing the data including where these conditions are natural or human-created from road fill and other actions. WDFW should be consulted to see if they have assessed this I-5 culvert as it is not currently on WSDOT's fish passage barrier list. A table of all existing fish passage barriers in the project corridor should be added to the FEIS to ensure that these culverts are fully considered as the project progresses towards a preferred alternative. We also request the opportunity to work directly and in close coordination with Sound Transit as the project progresses through environmental review and into permitting to ensure that these concerns are fully addressed early in the process.

TR1-2

TR1-3 As far as our previous concerns regarding stream and wetland impacts, the project has not identified a preferred alternative, and impacts vary by the alternatives and stations options. Further, the mitigation for all unavoidable impacts is currently unknown and may occur at a wetland bank, via King County's In Lieu program; and/or on-site. We request the opportunity to work directly with Sound Transit on the proposed mitigation plan early as it is developed to ensure any concerns regarding the type and location of mitigation can be addressed.

TR1-4 Our third scoping comment requested that the project should look at tree removal activities for the different alternatives by each subbasin as there are several individual subbasins draining to Puget Sound that appear could be affected by the project. Several of these areas had some previous evaluation work done as part of either the WRIA 9 limiting factors analysis or individual basin plans. While there is an analysis regarding tree removal by alternative, this information is not divided further for each subbasin so that one can see environmental effects from the project in a more cumulative fashion (i.e. wetland/buffer impacts; stream/buffer impacts; and tree removal effects by subbasin). The FEIS needs to analyze the tree removal impacts by subbasin as the DEIS did not.

We appreciate the opportunity to review this project and look forward to Sound Transit's responses. We

## Response to Comment TR1-1

Sound Transit met with the Muckleshoot Tribe after receiving scoping comments, and the Draft EIS addressed the Tribe's concerns. For example, Sound Transit coordinated with WSDOT to ensure the SR 99 Alternative crossing of McSorley Creek would not preclude WSDOT's future culvert replacement for fish passage at this location. The conceptual design of the SR 99 Alternative was modified to address the Tribe's scoping comments and was described accordingly in the Draft EIS. Sound Transit has continued to coordinate with WSDOT, WDFW, and the Muckleshoot Indian Tribe during the Final EIS preparation to identify any culverts that are fish passage barriers along the Preferred Alternative alignment. This was in response to a federal injunction ordering the State of Washington to repair or replace thousands of state-owned culverts blocking salmon runs and habitat. While Sound Transit is not certain which culverts are subject to the injunction, none of the FWLE alternatives or options would worsen culverts on fish-bearing streams or preclude future replacement or repair of existing barriers on fish-bearing streams. Sound Transit has coordinated extensively with WSDOT about the Preferred Alternative near Bingaman Creek and has modified the Preferred Alternative to not preclude WSDOT's ability to replace any state-owned barrier culverts with stream-simulation-designed culverts for fish passage. Additional design work would occur during final design and project permitting.

## Response to Comment TR1-2

Thank you for suggesting ways to improve the technical analysis and for working with Sound Transit, WSDOT, and WDFW on fish passage barriers along Bingaman Creek. As you know, WSDOT and WDFW also performed additional assessments of the creek and culverts during preparation of the Final EIS. Based on this additional coordination and field work, Sound Transit assumes that the culverts conveying Bingaman Creek under I-5

would appreciate direct responses in writing to these concerns. Please let me know if you have any questions.

Thank you,  
Karen Walter  
Watersheds and Land Use Team Leader

Muckleshoot Indian Tribe Fisheries Division  
Habitat Program  
39015 172nd Ave SE  
Auburn, WA 98092  
253-876-3116

and S 288th street are fish passage barriers, and has revised the characterization of existing barriers along Bingaman Creek from the Green River to the project site for the Final EIS. All fish passage barriers in the project corridor have been added to Exhibits 3-1 through 3-3 and are listed in Table 3-4 in the Ecosystems Technical Report (Appendix G2).

***Response to Comment TR1-3***

The Final EIS includes a preliminary assessment of wetland and stream mitigation options, including use of King County's In-Lieu Fee program. Sound Transit will coordinate with the Muckleshoot Indian Tribe during project permitting to finalize wetland and stream mitigation.

***Response to Comment TR1-4***

Sound Transit has refined tree removal impacts by subbasin for all alternatives in the Final EIS (see Appendix H of the Ecosystems Technical Report [Appendix G2]).

# Letter FW111

Washington State Department of Archaeology & Historic Preservation

Page 1



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

May 4, 2015

Mr. Steve Saxton  
Federal Transit Administration  
915 2nd Avenue  
Federal Building, Suite 3142  
Seattle, WA 98174-1002

In future correspondence please refer to:  
Log: 102912-18-FTA  
Property: Federal Way Link Transit Extension  
Re: Receipt of Draft EIS Historic and Archaeological Technical Report

Dear Mr. Saxton:

SA1-1 Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) and providing a copy of the Historic and Archaeological Technical report that will serve as a component of the draft Environmental Impact Statement. The report has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

I have no issues with the document at this time. I look forward to receiving the Archaeological resources monitoring and treatment plan as well as the inadvertent discovery plans prior to the onset of construction.

SA1-2 Please note that DAHP requires that all historic property inventory and archaeological site forms be provided to our office electronically. If you have not registered for a copy of the database, please log onto our website at [www.dahp.wa.gov](http://www.dahp.wa.gov) and go to the Survey/Inventory page for more information and a registration form. To assist you in conducting a survey, DAHP has developed a set of cultural resource reporting guidelines. You can obtain a copy of these guidelines from our website. Also, please note that DAHP requires that all cultural resource reports be submitted in PDF format on a labeled CD along or electronically. For further information please go to [http://www.dahp.wa.gov/documents/CR\\_ReportPDF\\_Requirement.pdf](http://www.dahp.wa.gov/documents/CR_ReportPDF_Requirement.pdf).

Thank you for the opportunity to review and comment.

Sincerely,

MAY 7 2015 PM 3:49

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

State of Washington • Department of Archaeology & Historic Preservation  
P.O. Box 48343 • Olympia, Washington 98504-8343 • (360) 586-3065  
[www.dahp.wa.gov](http://www.dahp.wa.gov)



## Response to Comment SA1-1

Thank you for your letter conveying that you have no comments on the Draft EIS and Historic and Archaeological Technical Report at this time. FTA submitted the updated Historic and Archaeological Resources Technical Report in April 2016. That report reflects additional archaeological field work completed during 2015. No archaeological resources were identified. DAHP concurred with FTA's finding of No Historic Properties Affected in May 2016. Sound Transit will prepare and implement an Inadvertent Discovery Plan (IDP) prior to construction. The draft IDP will be provided to DAHP for review.

## Response to Comment SA1-2

All HPI forms have been submitted electronically via WISAARD. The Historic and Archaeological Technical Report has also been submitted to DAHP.

# Letter FW617

Washington State Department of Transportation

Page 1



Lynn Peterson  
Secretary of Transportation

Northwest Region  
15700 Dayton Avenue North  
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Seattle, WA 98133-9710  
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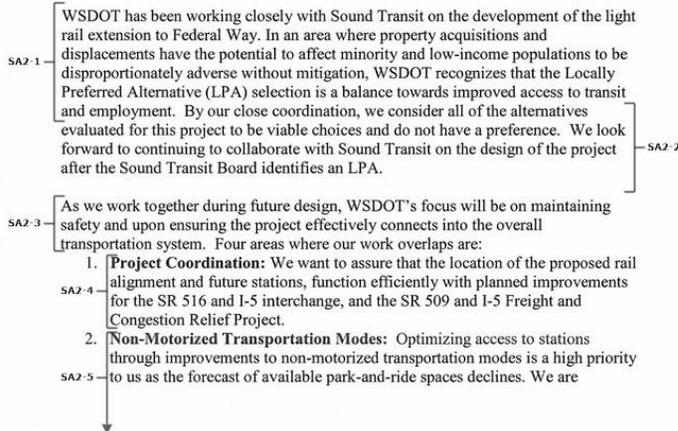
June 3, 2015

Mike Harbour  
Acting CEO  
Sound Transit  
401 South Jackson Street  
Seattle, WA 98104

Attention: **Federal Way Link Extension Draft EIS Comments**

Dear Mr. Harbour:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Federal Way Link Extension we received on April 30, 2015. The Washington State Department of Transportation (WSDOT) strongly supports the extension of light rail to Federal Way. As we work with our partners to develop an integrated transportation system for the 21<sup>st</sup> century, it is important to provide multiple mode choices to people trying to reach destinations in congested travel corridors like Interstate 5 (I-5). The Federal Way Link Extension project will add much needed capacity for moving people in the I-5 corridor and ultimately allow the entire transportation system to function better.



## Response to Comment SA2-1

Chapter 7, Environmental Justice, describes how the project would benefit all populations including low-income and minority populations. Benefits include improved access to transit and increased transit reliability with the Kent/Des Moines Station. Please also see the responses to Common Comment 3 and Common Comment 8 on Table 9-6 in Chapter 9 of the Final EIS.

## Response to Comment SA2-2

Your lack of preference for a specific alternative has been noted. Sound Transit appreciates the ongoing coordination that WSDOT has provided during the development of the FWLE.

## Response to Comment SA2-3

Your focus on safety is noted. An evaluation of project safety, including safety related to WSDOT facilities, is provided in Section 3.5.4 of Chapter 3 of the Final EIS.

## Response to Comment SA2-4

Sound Transit will continue to coordinate with WSDOT on the design of the FWLE and how it relates to the design of the SR 509 Extension Project. Chapter 2 of the Final EIS acknowledges that the SR 509 Extension Project is currently being evaluated for potential design changes. The preliminary engineering and Final EIS analyses reflect the 2003 design of this project.

## Response to Comment SA2-5

Sound Transit conducted workshops with WSDOT, local jurisdictions, and other stakeholders during preliminary engineering to identify potential non-motorized access improvements at all three Preferred Alternative stations and will continue to work with WSDOT and local jurisdictions regarding this issue during final design.

Mike Harbour  
June 3, 2015  
Page 2 SA2-5

confident that we will be able to work with Sound Transit and local jurisdictions to develop effective solutions.

3. **Habitat Connectivity and Fish Passage:** As part of larger, transportation construction project, the link extension to Federal Way offers opportunity to reduce fish passage barriers where culverts exist within the project limits. Fish passable culverts are a goal that aligns with the Governor's Results Washington priorities for "sustainable energy and clean environments". In addition, we are interested in design decisions considerate with our roadside policies about the loss of vegetation within WSDOT right of way. Areas of dense vegetation, and particularly areas with large trees, provide a habitat connectivity function that mitigation may not replace. SA2-6 SA2-7

4. **Climate Change:** Our work supports Results WSDOT's Environmental Stewardship Goal to improve environmental conditions; leave it better than before. One means is through the alternatives analysis of construction and operational greenhouse gas (GHG) emissions. We look forward to the disclosure of GHG emissions analysis for both the Build and No-Build conditions in the Final EIS. SA2-8

Overall, the Draft EIS conveys a thorough evaluation of the proposals environmental consequences and benefits, and is well prepared.

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

Sincerely,



Allison Hanson  
Environmental Mega Projects Director  
Washington State Department of Transportation

MT:ej

cc: Kent Hale, Sound Transit

**Response to Comment SA2-6**

Sound Transit will design all crossings of streams with culverts that are known fish barriers to accommodate the future replacement of the culverts with fish-passable structures by others (including WSDOT).

**Response to Comment SA2-7**

Section 4.9, Ecosystems, and Appendix G2, Ecosystems, have been updated for the Final EIS with additional information regarding the habitat value and functions of impacted forested areas, including an assessment of habitat connectivity.

**Response to Comment SA2-8**

GHG emission calculations for the No Build and build alternatives are disclosed in Section 4.6.4, Air Quality and Greenhouse Gases.

## Letter FW016

Dave Upthegrove, King County Council

Page 1

*No Comments*

**From:** [Upthegrove, Dave](#)  
**To:** [FW-E](#)  
**Cc:** [Joy, Chelsea](#)  
**Subject:** Federal Way Link Extension Comments  
**Date:** Friday, April 10, 2015 4:02:24 PM  
**Attachments:** [FW\\_EISComments.Upthegrove.pdf](#)

---

Dear Sound Transit Board Members,

Attached you will find my comments related to the Draft EIS for the Federal Way Link Extension.

I look forward to working with all of you as we move this project forward.

Sincerely,

Dave Upthegrove  
King County Council  
District 5

Dear Sound Transit Boardmembers,

The Draft Environmental Impact Statement (EIS) for the Federal Way Link Extension Project outlines several options for extending light rail south. One key decision we face is the location of the tracks between the Angle Lake and the Kent/Des Moines stations.

I believe an I-5 alignment from Angle Lake to the Kent/Des Moines station is the clear choice in balancing all of the public interests. We all share in the challenge of finding a preferred alternative that will:

RA1-1

- **Respect Local Communities** – Leaders in the affected cities support an I-5 alignment as the preferred alternative. The City of Des Moines is particularly adamant and resolute in their strong opposition to a Highway 99 alignment through their community.
- **Control Costs** – Costs of an I-5 alignment are comparable to the options along Highway 99.
- **Maximize Ridership** – The EIS identifies daily ridership for this alignment at 2,000 daily boardings which is on par with the Highway 99 alignment depending on the location of the Kent/Des Moines Station.
- **Support Transit Oriented Development** – Depending on station location, the potential for transit oriented development is comparable between the two major alignment choices.

Running the tracks along Highway 99 through the City of Des Moines would unnecessarily disrupt the economic development of a growing South County community. All of our regional objectives can be met by running the tracks along I-5.

RA1-2

I recognize the value of locating stations near planned population centers. In this case, the question is not where to locate stations, but simply the track alignment between two stations. The Angle Lake Station and the proposed Kent/Des Moines station are only 2.5 miles apart in a corridor served by King County Metro Rapid Ride. This proximity and existing connectivity of these stations, as well as the financial constraints and regional demands on the system as a whole, makes it extremely unlikely that a future station would be developed between the Angle Lake and Highline Community College stations.

Furthermore, I-5 and Highway 99 are reasonably close to each other along this stretch of the corridor. Thus, should a future generation wish to add a station, it will still be located in a developed area with potential density, transit oriented development, and other transit connections.

*Response to Comment RA1-1*

Please see response to Common Comment 2 in Table 9-6 of Chapter 9 of the Final EIS.

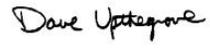
*Response to Comment RA1-2*

The Preferred Alternative would limit disruption to SR 99 in Des Moines to the location where it crosses from the west to east side of SR 99 and to improvements at 236th Street and SR 99 near the Kent/Des Moines Station. Its stations were sited to maximize ridership while reducing environmental impacts. The SR 99 and SR 99 to I-5 alternatives include a potential additional station at S 216th. Although this additional station would increase the overall TOD rating for these alternatives and create more opportunities for pedestrians to access light rail, there is currently no funding available to develop this station.

*No Comments*

For the reasons listed above, I ask for your support for an I-5 alignment from Angle Lake to the Kent/Des Moines Station.

Sincerely,

A handwritten signature in black ink that reads "Dave Upthegrove". The signature is written in a cursive style with a large, stylized "D" and "U".

Dave Upthegrove

# Letter FW334

Puget Sound Regional Council

Page 1



May 21, 2015

Sound Transit  
Attention: Federal Way Link Extension Draft EIS Comments  
Union Station, 401 South Jackson Street  
Seattle, WA 98104

Dear Mr. Hale,

The Puget Sound Regional Council (PSRC) appreciates the opportunity to comment on the *Federal Way Link Extension Draft Environmental Impact Statement (DEIS)*. Implementation of high capacity transit to support growing communities and provide options for regional mobility is fundamental to the success of VISION 2040, the region's integrated long-range strategy for growth management, transportation and economic development. Transportation 2040, the region's metropolitan transportation plan, includes extension of high capacity transit in this corridor as a vital component of enhancing mobility and providing travel choice in the region. Accordingly, PSRC has an ongoing interest in high capacity transit system planning for the SeaTac-Federal Way corridor and has been designated as a Participating Agency in this project.

RA2-1 We commend Sound Transit for their work on the Federal Way Link Extension Project to date and specifically the DEIS effort. In particular, we appreciate being included in the Interagency Working Group discussions associated with this project. The scope of the DEIS spans the many growth management, transportation, and economic development arenas for which PSRC oversees long-range regional planning. The DEIS has therefore been reviewed by transit planning, transportation modeling, and growth management department staff. The review found consistency with long-range planning documents and agreement with the methodologies used to evaluate the impacts and benefits of different stations and alignments.

RA2-2 In addition, we commend Sound Transit for conducting a comprehensive assessment of TOD potential as part of the alternatives analysis for the Federal Way Link Extension. Promotion of TOD, characterized by compact, walkable, mixed-use development, is key to implementing the objectives of VISION 2040, Transportation 2040, and the Growing Transit Communities Strategy that point the way toward a more sustainable, healthy, and equitable region. Not only does TOD pay significant dividends over the long term in expanded ridership, but incorporating TOD in the DEIS is an important step toward Sound

## Response to Comment RA2-1

Sound Transit will continue to work with PSRC in the planning of the FWLE project. Thank you for confirming that FWLE was consistent with long-range planning documents and agreeing with the methodologies used in the Draft EIS.

## Response to Comment RA2-2

Sound Transit has worked with PSRC and other stakeholders since the Draft EIS to refine station locations and designs to maximize ridership, access, and TOD opportunities. The updated TOD assessment includes a more comprehensive look at development potential. A summary of this assessment can be found in Section 4.2, Land Use.

RA2-2	<p>Transit aligning its high capacity transit investments with current and future land use and in doing so building a transit system that supports community building.</p> <p>The methods used in the TOD assessment for the Federal Way Link Extension are new and innovative, and PSRC appreciates the opportunity, along with other public sector stakeholders, to provide feedback throughout the process. As Sound Transit builds on the experience of this project to examine TOD potential around future prospective station locations, we look forward to further such opportunities to guide and tailor such analysis to other corridors in the region.</p> <p>The findings of the TOD assessment highlight important differences among the alternative station locations in each of the station areas considered in the DEIS. In particular, the general finding that stations located in proximity to SR-99 have substantially greater TOD potential than do stations closer to I-5 is a sound one, and a finding that is consistent with similar analysis of TOD readiness in the corridor conducted for Growing Transit Communities.</p> <p>For the Final EIS, we recommend several refinements or additions to the presentation of this material in the document.</p>
RA2-3	<p>First, the discussion sections should include a clearer statement on the importance and relevance of the ½ mile radius around light rail stations to TOD planning. While we agree with the rationale for focusing on a tighter radius (¼ mile) for the purposes of this study, PSRC's guidance on station area and transit-supportive land uses emphasizes the ½ mile (10-minute walk distance) as an appropriate scope for planning for TOD around high capacity transit stations.</p>
RA2-4	<p>Second, the TOD assessment is robust in considering multiple measures, including multimodal access, land use and capital facilities, market strength, and land availability. As currently presented, however, the Executive Summary of the DEIS reports TOD potential solely in terms of available acres. While we understand that the rankings on this measure closely align with the composite TOD scores, this approach risks oversimplifying TOD for the more casual reader. We recommend either reporting the composite score for TOD potential in the Executive Summary, or including a clear explanation of how the acreage figures fit in with the more comprehensive approach in the TOD assessment.</p>
RA2-5	<p>Finally, a note on TOD potential and travel time: PSRC recognizes the importance of comparing alignment and station alternatives in terms of the resulting light rail travel time. However, there is another dimension of travel time—door-to-door travel time for transit patrons—that would enrich the discussion on TOD potential in the DEIS. Residents and workers traveling to and from locations within walking distance of light rail stations in the corridor are likely to experience shorter door-to-door travel times than are travelers to and from more distant locations that require travel by automobile and particularly feeder bus transit. This is a benefit of TOD that should be made clearer.</p>

***Response to Comment RA2-3***

Sound Transit's FWLE Transit Oriented Development Study (Sound Transit, 2015) includes the rationale for the study area surrounding stations in Section 2, Methodology.

***Response to Comment RA2-4***

As noted, the TOD assessment considers measures such as access, land use, capital facilities, and market strength. The Draft EIS used land availability as a representative measure to compare TOD potential across the station locations. The updated TOD assessment considers development potential and impacts from the alignment in the station area. These results are summarized in Section 4.2, Land Use. The measure of land availability has been modified for the reasons noted in your comment in the FWLE Transit Oriented Development Study Addendum (Sound Transit, 2016).

***Response to Comment RA2-5***

The discussion in Chapter 6 of Appendix G1, Transportation Technical Report was revised to state that in general, door-to-door travel times would be shorter for residents within walking distance to stations. Transportation modeling in the Final EIS for travel time does not distinguish differences in door-to-door travel times between users walking to stations and those that may be transferring from an automobile or bus.

*No Comments*

The Federal Way Link Extension is an important long-range investment for our region. We commend Sound Transit again for the DEIS effort, and especially for the strengthened consideration of TOD potential. We appreciate the opportunity to comment and participate. If you have any questions regarding our comments, please contact our SEPA Responsible Official, Erika Harris, at (206) 464-6360 or [eharris@psrc.org](mailto:eharris@psrc.org) or Michael Hubner at (206) 971-3289 or [mhubner@psrc.org](mailto:mhubner@psrc.org).

Sincerely,

Erika Harris, SEPA Responsible Official, and Michael Hubner, Principal Planner

Puget Sound Regional Council  
1011 Western Ave, Suite 500  
Seattle, WA 98104

# Letter FW381

King County Department of Transportation and Department of Public Health

Page 1



**King County**  
**Department of Transportation**  
Harold S. Taniguchi, Director  
KSC-TR-0815  
201 South Jackson Street  
Seattle, WA 98104-3856  
206.477-3809 TTY Relay: 711  
www.kingcounty.gov/kcdot

May 26, 2015

Perry Weinberg, Director  
Office of Environmental Affairs and Sustainability  
Sound Transit  
410 S. Jackson St.  
Seattle, WA 98104

RE: Federal Way Link Extension Draft EIS Comments

Dear Mr. Weinberg:

- RA3-1 Thank you for the opportunity to review Sound Transit's Draft Environmental Impact Statement (DEIS) for the Federal Way Link Extension Project (FWLE). We commend Sound Transit for evaluating a variety of alignments and stations, and we concur with the conclusion that the Action Alternative options, as presented at this level, do not result in significant unavoidable adverse impacts with the exception of some construction-phase impacts.
- RA3-2 The DEIS clearly shows that no one alternative has all the potential benefits with fewest impacts. We understand that the development of a Locally-Preferred Alternative (LPA) will require you to carefully balance competing priorities, such as near-term project costs against long-term goals for Transit-oriented Development and environmental quality. As you move forward in selecting the LPA, we encourage you to consider social equity, impact on transit-dependent populations, and the creation of strong connections to destination locations along the corridor such as Highline Community College.
- RA3-3 Additionally, the impact of construction on business owners (large and small) and housing can have long-term health and well-being effects on communities and families. Consideration of these impacts as the LPA is being developed is critical to ensuring that quality of life remains high.
- RA3-4 Overall, King County's preference is firmly in favor of maximizing development potential and ridership. Denser growth and higher ridership will help bring our region closer to reaching regional and state transportation, environment, and climate change goals. Metro Transit will work to provide good connections and find efficiency dividends between Metro services and light rail in whatever alignment is chosen.

## *Response to Comment RA3-1*

Thank you for concurring with the Draft EIS findings. Significant and unavoidable impacts are described in Section ES.7 of the Executive Summary in the Final EIS.

## *Response to Comment RA3-2*

Chapter 8, Alternatives Evaluation, shows the trade-offs between alternatives, including ridership, cost, and environmental impacts. Please see responses to Common Comments 4 and 8 in Table 9-6 of Chapter 9 of the Final EIS. The Preferred Alternative includes a signalized crossing at S 236th Street and design elements to make the crossing safe and convenient for students as well as other Link rail users needing to cross there.

## *Response to Comment RA3-3*

Chapter 5 discusses the construction impacts from all alternatives, including the Preferred Alternative.

## *Response to Comment RA3-4*

Your preference for maximizing development potential and ridership has been noted. Please see response to Common Comment 11. Sound Transit appreciates your assistance and cooperation and will continue to work with Metro to integrate transit service with the FWLE project.

Perry Weinberg  
May 26, 2015  
Page

RA3-4

We look forward to working with you during development of the Final EIS, and suggest continuing coordination with King County Metro Transit's Strategic Planning and Analysis group. Please contact Peter Heffernan, Intergovernmental Relations, at [peter.heffernan@kingcounty.gov](mailto:peter.heffernan@kingcounty.gov) or by phone at 206-477-3814 to coordinate planning efforts or for clarification of any issues.

We hope our comments are helpful. We are committed to working with Sound Transit in pursuit of creative solutions to meet mobility goals.

Sincerely,



Harold S. Taniguchi, Director  
King County Department of Transportation



Patty Hayes, Interim Director and Health Officer  
Public Health – Seattle & King County

- cc: Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)  
Kevin Desmond, General Manager, Metro Transit Division, KCDOT  
Peter Heffernan, Government Relations Administrator, KCDOT  
Chris Arkills, Transportation Policy Advisor, King County Executive Office  
Richard Krochalis, Regional Administrator, Federal Transit Administration  
Joni Earl, Chief Executive Officer, Sound Transit

# Letter FW117

City of Kent

Page 1



OFFICE OF THE MAYOR  
Suzette Cooke, Mayor  
220 4th Avenue South  
Kent, WA 98032  
Fax: 253-856-6700

PHONE: 253-856-5700

May 5, 2015

Sound Transit Board  
Sound Transit DEIS  
401 S. Jackson Street  
Seattle, Washington 98104

Re: Federal Way Link Extension Draft Environmental Impact Statement

Dear Sound Transit Board Members:

U1-1 The City of Kent is excited that light rail will be extending to Kent by 2023. In addition to adding a significant benefit to our region, this project will promote the vision established by the Kent Midway Subarea plan, adopted in 2011 in preparation for light rail extending to the Kent/Des Moines area.

The City has been working closely with Sound Transit's project management and intergovernmental relations staff for a number of years on this important infrastructure project. City leaders have also been working in close consultation with Sound Transit, the public, the Washington State Department of Transportation, Highline College, and the Cities of SeaTac, Des Moines, and Federal Way.

U1-2 As you know there are a number of stakeholders involved in this project and a number of trade-offs to consider. It is the City's goal to create the place envisioned in the Midway Subarea Plan. This includes balancing key stakeholder interests, maximizing and incorporating safety and good design and promoting a flourishing economy through transit oriented development. While City staff is still reviewing the Draft EIS, we wanted to send you our initial thoughts on the City's preferred alignment and station location. The City of Kent prefers an I-5 alignment, transitioning to an elevated station on the west side of 30<sup>th</sup> Avenue South, before transitioning back to I-5 behind the existing Lowe's.

**Balance Stakeholder Interests.** Initially the City was leaning towards an SR 99 median alignment and station option, which provided close connections to Highline College and to Kent's transit-oriented development area. City leaders were made aware, early on, that the City of Des Moines and Federal Way had significant economic development concerns regarding an SR 99 alignment. As a result, City staff worked in consultation with Sound Transit and a panel of land use and urban development experts appointed by the Urban Land Institute to study possible alternatives that could meet the City's economic development vision in the Midway subarea, serve Highline College, and minimally impact commercial and residential properties. This process resulted in a preferred alignment and station location similar to one included in the Draft EIS, with a few modifications.

## Response to Comment LJ1-1

Thank you for supporting the FWLE. Please see response to Common Comment 2 in Table 9-6 of Chapter 9 of the Final EIS. Chapter 1, Purpose and Need, discusses regional and local planning that has supported development of the FWLE.

## Response to Comment LJ1-2

Please see response to Common Comment 2. The Sound Transit Board identified the I-5 Alternative with the Kent/Des Moines SR 99 East Station Option as the Preferred Alternative for the Final EIS. Stakeholder coordination shifted the Kent/Des Moines Station location to the west side of 30th Avenue S with the alignment transitioning back to I-5 behind Lowe's.

LJ1-3 **Maximize Safety.** The City is keenly interested in having the station be elevated to reduce conflicts with pedestrians, bicyclists, and motorists. Amendments to Kent City Code are being processed to require that high capacity rail facilities accessed by crossing streets with more than thirty thousand daily vehicle trips include a covered pedestrian overpass. The requirement of a pedestrian overpass from the station across SR 99 will not only reduce travel time for students accessing Highline College, but greatly reduce conflicts with non-motorized users and vehicles. SR 99 is a challenging corridor to serve multiple modes of travel, and already has a high pedestrian collision rate. It is paramount for safety mitigation that a pedestrian overpass be included in the Kent/ Des Moines Station area. The new street, identified in the Draft EIS as S. 236th Street will also be required to be fully signalized. For safety purposes, in keeping with the place-making vision, and to promote the area as an attractive destination for economic development, the City will require frontage improvements to SR-99 along the entire length of the project area (12-foot sidewalks, landscaping, and lighting) and complete street improvements to 30<sup>th</sup> Avenue South.

LJ1-4 **Promote Transit-Oriented Development (TOD).** Key principles for supporting a station on the west side of 30<sup>th</sup> Avenue South include that the station would be within walking distance of Highline College and that preserving the visibility and access along SR-99 will attract developers and promote the area as an attractive and convenient destination for redevelopment. If the station were to be located adjacent to SR-99, the Guideway would physically and visually isolate the area and consume some of the most desirable TOD properties identified by both Sound Transit's TOD consultant team and the Urban Land Institute Technical Advisory Panel. The City's goal in supporting our preference was to maximize TOD development opportunities outlined in Envision Midway and by the TOD consultants. We believe the preference does that while still creating a strong and convenient link to the station area and Highline College. By locating the station west of 30<sup>th</sup> Avenue South, the Guideway only crosses Midway once. It doesn't bisect parcels or leave irregularly shaped parcels that are unlikely to be developed. By crossing behind the Lowe's, the alignment maintains this important frontage and tempers the curve of the Guideway, which will minimize noise and vibration.

Thank you for the opportunity to comment. We look forward to continuing to engage with Board members as you get closer to making this important decision.

Sincerely,

  
 Suzette Cooke  
 Mayor

  
 Dana Ralph  
 Council President

c: Joni Earl, Sound Transit Chief Executive Officer  
 Kent City Council  
 Derek Matheson, Chief Administrative Officer

**Response to Comment LJ1-3**

The Preferred Kent/Des Moines Station is elevated. Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS.

In addition, a collaborative multi-agency/stakeholder process was conducted that recommended a package of improvements at the Kent/Des Moines Station. These included signalizing the SR 99 and S 236th Street intersection and providing streetscape improvements. These elements are included in the conceptual drawings located in Appendix F of the Final EIS. Sound Transit will continue to work with the City of Kent and other stakeholders through final design.

**Response to Comment LJ1-4**

Sound Transit cooperated with key stakeholders to refine the Preferred Kent/Des Moines Station location, partly to enhance TOD potential. Stakeholders at workshops held in September and October 2015 reached consensus on the station on the west side of 30th Avenue S as their preferred Kent/Des Moines Station. The Final EIS reflects that consensus.

## Letter FW569

City of Kent

Page 1

**From:** [Anderson, Charlene](#)  
**To:** [FWLE](#)  
**Cc:** [Levy, Chelsea](#); [Bridan, Caital](#)  
**Subject:** Comments on FWLE Draft Environmental Impact Statement  
**Date:** Tuesday, May 26, 2015 3:31:11 PM  
**Attachments:** [DEIS Review - City of Kent Comments 05262015.xlsx](#)  
[FWLE Letter to the ST Board.pdf](#)  
[Kent DEIS Comments 05262015.pdf](#)

LJ14-1 - The City appreciated the opportunity to review the significant body of work in the Draft Environmental Impact Statement (DEIS) for the Federal Way Link Extension, and we also have appreciated the continuous communication from Sound Transit staff since the early scoping of this project. Attached are the City's comments on the DEIS (in both Excel and PDF format) as well as a copy of the comment letter sent to Sound Transit in early May from Kent Mayor Suzette Cooke and Kent Council President Dana Ralph.

**Charlene Anderson, AI CP, Planning Manager**  
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400 West Gove, Kent, WA 98032  
Main 253-856-5454 | Direct 253-856-5431  
[canderson@KentWA.gov](mailto:canderson@KentWA.gov)

**CITY OF KENT, WASHINGTON**  
[KentWA.gov](#) [Facebook](#) [Twitter](#) [YouTube](#)  
PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS E-MAIL

## Response to Comment LJ14-1

Sound Transit appreciates your cooperation and assistance and will continue to work with the City in development of the FWLE project.



OFFICE OF THE MAYOR  
Suzette Cooke, Mayor  
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Kent, WA 98032  
Fax: 253-856-6700

PHONE: 253-856-5700

May 5, 2015

Sound Transit Board  
Sound Transit DEIS  
401 S. Jackson Street  
Seattle, Washington 98104

*Response to Comment LJ14-2*

Please see responses to comments for letter FW117.

Re: Federal Way Link Extension Draft Environmental Impact Statement

Dear Sound Transit Board Members:

The City of Kent is excited that light rail will be extending to Kent by 2023. In addition to adding a significant benefit to our region, this project will promote the vision established by the Kent Midway Subarea plan, adopted in 2011 in preparation for light rail extending to the Kent/Des Moines area.

The City has been working closely with Sound Transit's project management and intergovernmental relations staff for a number of years on this important infrastructure project. City leaders have also been working in close consultation with Sound Transit, the public, the Washington State Department of Transportation, Highline College, and the Cities of SeaTac, Des Moines, and Federal Way.

As you know there are a number of stakeholders involved in this project and a number of trade-offs to consider. It is the City's goal to create the place envisioned in the Midway Subarea Plan. This includes balancing key stakeholder interests, maximizing and incorporating safety and good design and promoting a flourishing economy through transit oriented development. While City staff is still reviewing the Draft EIS, we wanted to send you our initial thoughts on the City's preferred alignment and station location. The City of Kent prefers an I-5 alignment, transitioning to an elevated station on the west side of 30<sup>th</sup> Avenue South, before transitioning back to I-5 behind the existing Lowe's.

LJ14-2

**Balance Stakeholder Interests.** Initially the City was leaning towards an SR 99 median alignment and station option, which provided close connections to Highline College and to Kent's transit-oriented development area. City leaders were made aware, early on, that the City of Des Moines and Federal Way had significant economic development concerns regarding an SR 99 alignment. As a result, City staff worked in consultation with Sound Transit and a panel of land use and urban development experts appointed by the Urban Land Institute to study possible alternatives that could meet the City's economic development vision in the Midway subarea, serve Highline College, and minimally impact commercial and residential properties. This process resulted in a preferred alignment and station location similar to one included in the Draft EIS, with a few modifications.

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© MAYOR SUZETTE COOKE

**Maximize Safety.** The City is keenly interested in having the station be elevated to reduce conflicts with pedestrians, bicyclists, and motorists. Amendments to Kent City Code are being processed to require that high capacity rail facilities accessed by crossing streets with more than thirty thousand daily vehicle trips include a covered pedestrian overpass. The requirement of a pedestrian overpass from the station across SR 99 will not only reduce travel time for students accessing Highline College, but greatly reduce conflicts with non-motorized users and vehicles. SR 99 is a challenging corridor to serve multiple modes of travel, and already has a high pedestrian collision rate. It is paramount for safety mitigation that a pedestrian overpass be included in the Kent/ Des Moines Station area. The new street, identified in the Draft EIS as S. 236th Street will also be required to be fully signalized. For safety purposes, in keeping with the place-making vision, and to promote the area as an attractive destination for economic development, the City will require frontage improvements to SR-99 along the entire length of the project area (12-foot sidewalks, landscaping, and lighting) and complete street improvements to 30<sup>th</sup> Avenue South.

**Promote Transit-Oriented Development (TOD).** Key principles for supporting a station on the west side of 30<sup>th</sup> Avenue South include that the station would be within walking distance of Highline College and that preserving the visibility and access along SR-99 will attract developers and promote the area as an attractive and convenient destination for redevelopment. If the station were to be located adjacent to SR-99, the Guideway would physically and visually isolate the area and consume some of the most desirable TOD properties identified by both Sound Transit's TOD consultant team and the Urban Land Institute Technical Advisory Panel. The City's goal in supporting our preference was to maximize TOD development opportunities outlined in Envision Midway and by the TOD consultants. We believe the preference does that while still creating a strong and convenient link to the station area and Highline College. By locating the station west of 30<sup>th</sup> Avenue South, the Guideway only crosses Midway once. It doesn't bisect parcels or leave irregularly shaped parcels that are unlikely to be developed. By crossing behind the Lowe's, the alignment maintains this important frontage and tempers the curve of the Guideway, which will minimize noise and vibration.

Thank you for the opportunity to comment. We look forward to continuing to engage with Board members as you get closer to making this important decision.

Sincerely,

  
 Suzette Cooke  
 Mayor

  
 Dana Ralph  
 Council President

c: Joni Earl, Sound Transit Chief Executive Officer  
 Kent City Council  
 Derek Matheson, Chief Administrative Officer

	A	B	C
1			
2			<b>City of Kent Comments on FWLE Draft EIS - 5-26-2015</b>
3	LJ14-3 1. Purpose and Need for FWLE		The DEIS should look ahead to an east-west transit linkage to Kent Station, and evaluate which station placement is most supportive.
4	LJ14-4 2. Alternatives Considered		For the alternative evaluations, the DEIS estimates costs of the different lines, but does not show the degree of confidence in those estimates or the range in which those estimates may be off target. Construction cost estimation is usually done to various degrees of certainty, and more transparency (big, bright asterisks and explanatory footnotes to cost estimation methodology) to that in the document would be preferable—especially in Chapters 2 and 8.  Selecting a preferred alternative should not be driven by cost differences only visible in the first or second decimal place when there is a likelihood of large overlap in what the final cost of alternative projects may be. The graphic tables that read "Cost \$1.77 Bn" creates an issue of representing the cost estimates with a false precision. More transparency and caveats on the costing number is important in making a proper assessment of each alternatives' costs and benefits.
5		2.1 Overview	
6	LJ14-5	2.2 FWLE Project Alternatives	2-21 and 3-34: Because Sound Transit proposes a 1,240-space structured parking garage at a Star Lake Park-and-Ride station, an alignment and station location between I-5 and the on/off ramps with a bike-pedestrian overpass to the parking garage should be considered. This could place the FWLE infrastructure as far away from the adjacent residential developments as possible. Secondly, increasing the parking spaces in this location by 700 stalls would likely necessitate infrastructure improvements to S. 272nd Street or other roadways. Sound Transit should reassess the impacts of at least 700 new users of the park and ride; the statement that "impacts on vehicle circulation and access are not expected" doesn't seem logical.
7		2.3 Alternatives Development and Scoping	
8		2.4 Environmental Practices and Commitments	
9		2.5 Estimated Project Costs and Funding	

**Response to Comment LJ14-3**

East-west transit service would be provided with any of the Kent/Des Moines stations. Appendix G1, Transportation Technical Report, describes the transit service integration that is proposed for the FWLE project.

**Response to Comment LJ14-4**

Sound Transit consistently uses FTA's Standard Cost Categories cost estimating methodology. It differs in level of detail for various levels of engineering design. The Final EIS notes that these are conceptual-level cost estimates and all estimates are rounded to the nearest \$10 million, which is appropriate for the conceptual level of design. The cost estimates provided in the Draft and Final EIS are intended to provide an order of magnitude comparison between alternatives.

**Response to Comment LJ14-5**

Sound Transit identified several challenges to a station location between the S 272nd Street off-ramp and I-5, including pedestrian access requiring a bridge over the off-ramp, and WSDOT and FHWA concerns with limiting options for I-5 and this ramp. Sound Transit completed additional analysis on traffic impacts at the S 272nd Star Lake Station for the Final EIS. Please see Appendix G1, Transportation Technical Report, for the results of this analysis and proposed mitigation, including improvements at the ramp terminals at S 272nd Street.

	A	B	C
10		2.6 Interim Terminus Stations	
11		2.7 Relationship to Other Transportation and Transit Projects	
12		2.8 Next Steps and Schedule	
13	3. Transportation Environment and Consequences		
	LJ14-6		<p>3.1 The City is concerned about traffic impacts caused by an additional 1,000 (permanent) parking spaces at either a Star Lake or Redondo Station at 272nd. As stated in the EIS, in general, stations with the most parking will see the greatest increase in vehicular traffic. 272nd is already a significantly stressed corridor that frequently fails. The City requests that ongoing monitoring and mitigation occur at major intersections within the study area along 272nd to capture the actual impacts of increased vehicular traffic in the area, including I-5 on and off ramps.</p> <p>In the Midway Subarea Plan the City identified a bridge crossing over I-5 at S 240th St to connect the West Hill of Kent to a future TOD in Midway. Sound Transit should work with the City to insure that the station and guideway do not prevent this connection from being built in future years.</p> <p>The City is supportive of a new roadway at S 236th in the Kent Des Moines Station area.</p>
14		3.1 Summary	

**Response to Comment LJ14-6**

Chapter 3, Transportation Environment and Consequences, of the Final EIS describes the transportation system, including the proposed roadway system and traffic analysis at both of these stations. The analysis described in Section 3.5.2 and Section 7.3 of Appendix G1, Transportation Technical Report, confirms that the area’s traffic would operate as well as, or better than, future no-build conditions after mitigation. None of the FWLE alternatives would preclude a future extension of S 240th Street over I-5.

	A	B	C
15	LJ14-7	3.2 Transportation Elements and Study Area	<p>While the City is pleased that the draft EIS identifies that more transit feeder service will be needed, we look forward to there being more detail in the final EIS. Frequent all-day East/West connections for riders traveling to/from Kent Station will be necessary. Additionally, local service connecting the West Hill Community in Kent to light rail is very important to ridership on the network.</p> <p>All modes of travel will significantly increase as the FWLE is built out. Sound Transit should work with the City to minimize any conflicts between travel modes. For example, the stations should be designed in such a way to prevent buses from blocking bike lanes near the station. Way-finding for bicycles, transit riders, and pedestrians will be necessary. Sound Transit will need to work with the City to insure that safety is maximized for all modes in and around stations. Bicycle and pedestrian facilities will need to be upgraded in and around the station areas and meet all ADA requirements. Additional bicycle and pedestrian facilities may be required to enhance safety and mobility.</p>
16	LJ14-8	3.3 Methodology and Assumptions	<p>Both trench and at-grade guideway conditions present a number of access issues for all modes of travel along the corridor. An elevated guideway is more favorable in terms of access.</p> <p>Cut-through traffic and spillover parking in neighborhoods are concerns near all of the proposed stations. Parking management and enforcement will be necessary mitigation in addition to ongoing monitoring.</p> <p>Concrete roadways will need to be constructed within the station areas and along any newly constructed roadway that will be impacted by buses.</p> <p>Whether the Kent/Des Moines station is located east of SR 99 near Highline College or on the Highline College campus, it will be necessary to construct a safe, attractive, weather-protected pedestrian/bike bridge. Not only will a pedestrian/bike bridge decrease the walk/bike time for students accessing Highline's campus from the east side of SR 99 or for patrons accessing the TOD from the west side of SR 99, it will be a major safety improvement along SR 99, a corridor that has a high pedestrian and bicycle collision rate.</p>

**Response to Comment LJ14-7**

Sound Transit coordinated with King County Metro to update the transit integration plan included in Appendix G1, Transportation Technical Report, for the Final EIS. Sound Transit also coordinated with cities in the FWLE corridor regarding station planning and design during preliminary design and will continue to do so through final design. Stakeholder workshops helped identify needs for improved non-motorized access to station areas and helped clarify responsibility for funding and building such improvements.

**Response to Comment LJ14-8**

The Preferred Alternative would be grade-separated for all road crossings, but at-grade, trenched, or elevated elsewhere, depending on topography.

Chapter 3 of the Final EIS describes the transportation system, including the proposed roadway system and station access, parking, and traffic analysis at both of these stations. As discussed in Section 3.5.5., limited potential for cut-through traffic at stations exists because there are no roads near stations that could be used for cut-through traffic. Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS regarding pedestrian and bicycle safety near the Kent/Des Moines Station.

	A	B	C
17	LJ14-9	3.4 Affected Environment	3-11- The DEIS indicates the intersection of SR 99 and K-DM Road had the greatest number of crashes and highest intersection crash rate in the study area. Furthermore, the segment of SR 99 between S. 216th Street and K-DM Road has crash rates over the statewide average. A pedestrian/bicycle overpass on SR 99 would minimize impacts to safety from the additional traffic accessing station areas, as well as minimize impacts to traffic flow from additional signalization triggers from on-street pedestrian and bicycle crossings. 3.4.6 Pg. 3-12- This section should recognize the infrastructure improvements identified as needs in the Midway Subarea Plan Land Use Scenario 4.0 as a basis for considering connections to the city's non-motorized transportation network existing and planned.
18		3.5 Environmental impacts	
19		3.6 Indirect Impacts	
20		3.7 Potential Mitigation Measures	
21	4. Affected Environment and Environmental Consequences		
22		4.1 Acquisitions, Displacements and Relocations	
23	LJ14-10	4.2 Land Use	It may be misleading to suggest for TOD the quantity of land dictates the supportiveness rather than the qualities of the land (visibility to roadways, access by multiple modes, parcel sizes, existing tenants, visual amenities like Sound views, etc.). For instance, Exhibit 4.2-5 is not very helpful for Kent, because it suggests no difference between 6 of the 8 station placement options. The site plan details matter here most, and a view of TOD support judged strictly on amount of land is a product of the scale of this study, but is also an oversimplification. The text does cover these differences in more depth, but the visuals perhaps matter more for how people will actually consume the information in the report.

**Response to Comment LJ14-9**

Chapter 3 of the Final EIS describes the safety and traffic analysis for the roadway and non-motorized system at the Kent/Des Moines stations. See response to comment LJ14-8 regarding an overpass over SR 99.

**Response to Comment LJ14-10**

The TOD study summarized in the Draft EIS sought to identify differences between alternatives. In many cases, the overall ratings for the stations were not that different, as shown in Exhibits 4.2-4 and 4.2-5 of the Draft EIS.

The Final EIS reflects additional TOD analysis completed since the Draft EIS. Sound Transit evaluated each station location using four measures to assess TOD potential:

1. Access to each station location - How accessible is the station for pedestrians, bicycles, other forms of transit, and automobiles?
2. Land use plans and policies, and utilities around each station location - How do existing land use policies, plans, regulations, and infrastructure support new development?
3. Market support at each station location - Is the location competitive for multi-family housing, retail, office, and/or lodging?
4. Development potential - How much net new development can be accommodated within 1/4 mile of each station after light rail is constructed, as measured by residential and commercial square footage?

The TOD Report and Addendum can be found online at <http://www.soundtransit.org/Projects-and-Plans/Federal-Way-Link-Extension/Federal-Way-document-archive>.

	A	B	C
24	LJ14-11	4.3 Economics	The Site planning of development, the vision of the adjacent ownership, and the ability by Sound Transit to assist in assembling parcels in the vicinity of a station will matter for local economic impact more than tax impact differences, whose estimation may lie close to the margins of estimation error. In regards to the listings of the displacement of businesses, residents, or the number of acquisitions or takings of property, the report is very clear on the choices.
25		4.4 Social Impacts, Community Facilities, and Neighborhoods	
26	LJ14-12	4.5 Visual and Aesthetic Resources	Exhibit 4.5-2 and Pg. 4.5-16- The DEIS describes lowering of visual quality adjacent to residential development west of I-5 between S 252nd Street and S 259th Pl, as well as adjacent to the Greenfield Park neighborhood. See comment under G3 regarding locating the FWLE alignment as far away as possible from the residential development, as well as adding noise walls and mature vegetation. Additionally, Sound Transit should consider placement of the Star Lake station, columns, and garage to avoid decreasing solar access to the residential developments. Sound Transit has applied innovative and attractive designs to Angle Lake and other stations, and the City looks for the same commitment for stations in this corridor.
27		4.6 Air Quality and Greenhouse Gases	
28		4.7 Noise and Vibration	

**Response to Comment LJ14-11**

Section 4.4 of the Final EIS summarizes the likely economic impacts of the FWLE alternatives and qualitatively describes TOD’s potential indirect economic benefits. Transit infrastructure investment and the ability to assemble parcels are just two of many factors that shape the local real estate market for TOD development. It would be speculative to attempt to isolate and quantify the direct economic impacts of the FWLE on TOD.

**Response to Comment LJ14-12**

Section 4.5 of the Final EIS contains a revised analysis of visual impacts near some residential areas, including between S 252nd Street and S 259th Place and near the Greenfield Park Neighborhood. More information on site-specific mitigation, including landscaping, has been added for all alternatives. The need for sound walls is determined by the noise analysis (please see Section 4.7, Noise and Vibration, and Appendix G3, Noise and Vibration Technical Report). As described in Appendix J to the Final EIS, in some areas there may be ways to move the alignments away from residences while also meeting the needs of WSDOT and FHWA for the I-5 right-of-way.

A	B	C
	LJ14-13	<p>Section 4.8.1 Water Resources Summary:                      Although some impacts to streams may be avoided by elevated structures, there will still be impacts to the habitat and vegetation within the streams. Vegetation will be shaded out by the elevated structure. This comment is common to all stream crossings, including the alternatives crossing McSorley Creek and Massey Creek. This would be consistent with the description of potential impacts to wetlands as described in Section 4.9.4.2.</p> <p>Section 4.8.3.2 Floodplains and Figure 4.8-1:                      Although the text accurately describes the 1995 published FEMA Flood Insurance Rate Maps, the figure does not reflect the flood hazard areas on those maps. The figure appears to depict the preliminary maps from November, 2010 which were not finalized by FEMA.</p>
29	4.8 Water Resources	
30	4.9 Ecosystems	
31	4.10 Energy Impacts	
32	4.11 Geology and Soils	
33	4.12 Hazardous Materials	
34	4.13 Electromagnetic Fields	
	LJ14-14	<p>Fire - No comments to text. Reviewed alternative routings in the appendices and do not see any neighborhoods that would be isolated if there were damage to the guideway.</p> <p>Police - From a Public Safety and Security standpoint, the Police Department is positioned to support any of the proposed station locations. Each of the proposed station locations share comparable safety and security challenges. Our preference would be to locate the station in an area that affords the easiest vehicular access and is conducive to the normal travel routes of our patrol officers. Our officers utilize SR 99 more than I-5 to conduct their normal patrols. Therefore, station locations closer to SR 99 will naturally see a higher frequency of police presence.</p>
35	4.14 Public Services, Safety, and Security	
36	4.15 Utilities	
37	4.16 Historic and Archaeological Resources	
38	4.17 Parkland and Open Space	

**Response to Comment LJ14-13**

Section 4.8 summarizes the encroachment, hydrologic, and hydraulic impacts to the streams. The impacts of shading and vegetation on stream habitat are addressed in Section 4.9, Ecosystems. Exhibit 4.8-1 in the Draft EIS reflects floodplain area data from the King County Hydro Geodatabase (fall 2013) and shows the best available 100-year floodplain boundaries; it is more current than 1995 FEMA maps. All exhibits have been updated with corresponding fall 2015 King County data for the Final EIS, and the text has been revised to clarify.

**Response to Comment LJ14-14**

As described in Section 4.14, Public Services, Safety, and Security, Sound Transit will prepare a Safety and Security Management Plan (SSMP) for the project, and a Fire/Life Safety Committee will review safety requirements and develop solutions including access. Sound Transit has been coordinating with jurisdictions, stakeholders, and service providers during preliminary design to discuss safety and security hazards and how to mitigate them, and will continue to do so through final design, construction, and operation.

	A	B	C
39	5. Construction		
40		5.1 Construction Approach	
41		5.2 Construction Impacts and Potential Mitigation Measures	
42		5.2.1. Transportation	
43		5.2.2 Acquisitions, Displacements, and Relocations	
44		5.2.3. Land Use	
45		5.2.4. Economics	
46		5.2.5. Social, Community and Neighborhoods	
47		5.2.6 Visual and Aesthetics	
48		5.2.7 Air Quality	
49		5.2.8 Noise and Vibration	
50		5.2.9 Water Resources	
51		5.2.10 Ecosystems	
52		5.2.11 Energy Impacts	
53		5.2.12 Geology and Soils	
54		5.2.13 Hazardous Materials	
55		5.2.14 Electromagnetic Fields	
56	LJ14-15	5.2.15 Public Services, Safety and Security	See 4.14
57		5.2.16 Utilities	
58		5.2.17 Historic and Archaeological Resources	
59		5.2.18 Parks and Recreational Resources	
60	6. Cumulative Impacts		
61		6.1 Introduction	
62		6.2 Temporal and Geographic Boundaries of Cumulative Analysis	
63		6.3 Past and Present Actions	
64		6.4 Reasonably Foreseeable Future Actions	
65		6.5 Cumulative Impact Assessment	
66		6.5.1 Transportation	
67		6.5.2 Acquisitions, Displacements, and Relocations	

*Response to Comment LJ14-15*

Please see response to comment LJ14-14.

	A	B	C
68		6.5.3 Land Use	
69		6.5.4 Economics	
70		6.5.5 Social Impacts, Community Facilities and Neighborhoods	
71		6.5.6 Air Quality	
72		6.5.7 Noise and Vibration	
73		6.5.8 Ecosystems	
74		6.5.9 Water Resources	
75		6.5.10 Energy Impacts	
76		6.5.11 Geology and Soils	
77		6.5.12 Hazardous Materials	
78		6.5.13 Electromagnetic Fields	
79	LJ14-16	6.5.14 Public Services, Safety and Security	Fire - No comments Police - See 4.14
80		6.5.15 Utilities	
81		6.5.16 Historic and Archaeological Resources	
82		6.5.17 Parks and Recreational Resources	
83		6.6 Potential Mitigation Measures for Cumulative Impacts	
84	7. Environmental Justice		
85		7.1 Summary	
86		7.2 Introduction and Regulatory Framework	
87		7.3 Methodology and Approach	
88		7.4 Study Area Demographics	
89		7.5 Outreach to Minority and Low-income Populations	
90		7.6 Project Impacts and Potential Mitigation	
91		7.7 Project Benefits	
92		7.8 Conclusion	
93	8. Alternatives Evaluation		
94		8.1 Meeting the Purpose and Need for FWLE	
95		8.2 Comparison of Alternatives	
96		8.3 Commitment of Resources	

*Response to Comment LJ14-16*

Please see response to comment LJ14-14.

	A	B	C
97		8.4 Areas of Controversy and Issues to be Resolved	
98	LJ14-17 Appendix A. Document Support Information		It would be useful to include an analysis of the efficacy of elevated trains versus at-grade trains, or ridership totals when running alongside other modes like highways versus separated from those highways, and include discussion of those trade-offs and experiences in other metros.
99	Appendix B. Public Involvement and Agency Coordination		
100	Appendix C. Alternatives Analysis Reports and Scoping Summary		
101	Appendix D. Technical Appendices		
102		D4.1 Potentially Affected Parcels	
103	LJ14-18		D4.2-5 and D4.2-12- Discussing only HCT without the context of connections to other centers tells only half the story. Kent is both a Regional Growth Center (Urban Center) and a Manufacturing/Industrial Center. In support of a transportation network and in support of the King County Countywide Planning Policies, Sound Transit should come to an agreement with Metro regarding service guidelines to provide links from the FWLE station locations to these centers.  D4.2-8- Kent will be adopting an updated comprehensive plan in late summer 2015. Kent adopted high capacity transit regulations on May 19, 2015. The HCT code requires a Conditional Use Permit for HCT facilities, and contains provisions for items such as station design and amenities, structured and surface parking, pedestrian overpass and signalized crossings, off-site improvements, signage, open space, plazas, and development agreements.  D4.2.18- The final EIS should redo this evaluation with the newly updated Comprehensive Plans.
104		D4.2 Land Use	
105		D4.3 Economics	
106		D4.6 Air Quality	
107		D4.8 Water Resources	
		D4.11 Geology and Soils Data	

**Response to Comment LJ14-17**

The FWLE Final EIS compares alternatives that include a variety of profiles and alignments in relation to major roadways (see Section 2.2.2.1 of the Final EIS). As described in Section 3.5.2.4 of Chapter 3, Transportation, of the Final EIS, all FWLE alternatives run beside or in the median of major roadways or highways so there would be no substantive differences in efficacy or ridership between alternatives based on their configuration next to roadways.

**Response to Comment LJ14-18**

Sound Transit worked with King County Metro on providing transit service to other regional centers from FWLE stations. The conceptual transit plan with the project is included in the Transportation Technical Report, Appendix G1 of the Final EIS. Sound Transit has been coordinating and will continue to coordinate with the City of Kent on the FWLE. Appendix D4.2 has been updated to reflect the City's current Comprehensive Plan.

	A	B	C
108		D4.12 Hazardous Materials	
109		D6 Reasonably Foreseeable Future Actions	
110	Appendix E. Section 4(f) Evaluation		
111	Appendix F. Conceptual Drawings		P. 102- The FWLE alignment and station should allow for the future I-5 overpass in the vicinity of S. 240th Street as envisioned in the Midway Subarea Plan, Land Use Scenario 4.0.
112	Appendix G. Technical Reports		
113		G1 Transportation Technical Report	
114		G2 Ecosystems Technical Report	
	LJ14-20		<p>P. 6-3 through 6-6, and 3.12- Moderate and severe noise impacts to residential development are identified. For example, for the I-5 alignment and Star Lake station, along with the corresponding improvement of 28th Avenue South, Sound Transit should place the alignment as far away from the residences as possible (reaching an appropriate compromise for the I-5 clear zone), replace vegetation that is removed with mature trees and shrubs, as well as an attractive noise wall as desired by the community. Additionally, Sound Transit should add a significant gateway element on 28th Avenue South to define the entrance to residential areas such as the Greenfield Park development north of the Park and Ride; this could discourage additional traffic impacts into the residential areas, as well as discourage non-resident entry into the community for HCT offsite parking or other undesirable encroachment.</p> <p>Noise walls should be constructed as early as possible to help minimize noise impacts associated with construction. Once the project is complete, Sound Transit should continue to work with property owners to mitigate any noise and vibration impacts.</p>
115		G3 Noise and Vibration Technical Report	
116		G4 Historic and Archaeological Technical Report	
	LJ14-21		<p>Impacts on visual quality—rather, how legible commercial opportunities are and how visible retail is from roads—matters for the viability of retail businesses, too. Station placement and choices of elevated or non-elevated will have an impact on retail businesses that should be considered. Currently, visual impact is one only viewed as relevant for residential uses.</p>
117		G5 Visual Technical Report	

**Response to Comment LJ14-19**

Please see response to comment LJ14-6.

**Response to Comment LJ14-20**

Section 4.7, Noise and Vibration, describes the noise and vibration impacts that would occur from the light rail and traffic accessing the station and proposes noise and vibration mitigation. In the Greenfield Park area, the alignment alternatives would be in a trench whose walls would prevent the train noise from reaching any sensitive noise receivers. Sound Transit would mitigate visual impacts with landscaping next to the trench where land is available. Section 4.7 also describes how potential noise impacts with the S 272nd Star Lake Elevated Station Option would be mitigated. See Section 4.5, Visual and Aesthetic Resources, and Appendix G5, Visual Technical Report, for more detail about mitigation.

Contractors will be required to meet all local construction noise regulations. Section 5.2.8.1 identifies likely construction noise mitigation measures.

**Response to Comment LJ14-21**

The FWLE EIS’s visual assessment methodology is widely used for transportation projects. Developed by FHWA, it focuses on how alternatives might lower the visual quality of areas seen by sensitive viewers. It does not assess the visibility of businesses and signs. Please see Section 4.3, Economics, for information on potential economic impacts to businesses.

	A	B	C
118	Appendix H. Location of I-5 Alternative within I-5 Right-of-Way		
119	Other Technical Documents		
120	LJ14-22 Transit Oriented Development Study	<p>2-2- Many other factors affect walkability beyond the infrastructure and other factors described. Lighting, street furniture, ramps for ADA accessibility, trees for shade, etc., all have a profound impact on how walkable/safe/inviting an environment feels to pedestrians. Sound Transit should consider these factors as well. Additionally, access from the station to destinations in addition to Highline College should be considered, e.g., nearby businesses, schools and parks that are under 2 miles away in all directions.</p> <p>2-4- Many other factors affect bikability beyond facility type, proximity and topography. Vehicle speed, road width, presence of vegetation, sightlines and lighting all affect how safe and effective a bike route is. Sound Transit should do further analysis of bikability taking more factors into account.</p> <p>2-7- Parks are a crucial part of livable TOD. As Sound Transit evaluates the connections between its station, plaza, bus routes, parking, and so forth, Sound Transit also should evaluate connections from the station plaza to future TOD, parks and open space as part of the livable community that supports the FWLE investment.</p> <p>5-2- See comment for Page 2-2.</p> <p>5-3- Again, safe bicycling requires more than facilities, proximity and easy topography. See comment for Page 2-4.</p> <p>7-7- Given that the Star Lake station option is in Kent, Sound Transit should incorporate evaluation of the Kent Comprehensive Plan here.</p>	

**Response to Comment LJ14-22**

Thank you for your comments on how pedestrian-friendly streetscapes, park amenities, and other factors can affect TOD. Sound Transit did not include these factors when developing the methodology for the TOD study because the factors were very similar for the eight station locations in the Kent/Des Moines Station area and did not provide differentiating outcomes. However, Sound Transit focused on them during the station area planning and design process that began after the Draft EIS phase. At station access workshops for the Kent/Des Moines, S 272nd Star Lake, and Federal Way Transit Center stations, stakeholders identified goals and priorities for safe connections, pedestrian-friendly streetscapes, and access-enhancing design ideas. To further develop these details, Sound Transit also discussed urban design and pedestrian and bicycle connections with City of Kent, City of Des Moines, and Highline College staff. The preliminary engineering station design for the Preferred Alternative reflects this coordination; more coordination will occur. The Kent Comprehensive Plan was considered in the planning for the Kent/Des Moines and S 272nd Star Lake stations.

	A	B	C
<p>LJ14-23</p> <p>121 City Preference</p>		<p>Based on input from SeaTac, Des Moines and Federal Way indicating a preference for an I-5 alignment and a station serving Highline College, and based on the City of Kent's desire to maximize TOD potential, the City's preferred alignment is elevated from I-5 to 30th and back to I-5 behind Lowe's, with a station location abutting the west side of 30th Avenue South at or over S 236th Lane (see attached letter from Kent Mayor Suzette Cooke and Kent Council President Dana Ralph). Other blended alignments and station locations have been discussed and Sound Transit should update their TOD assessment working with their consultants as well as the Urban Land Institute to assess the best option for TOD.</p> <p>The City is opposed to locating the guideway along the east or west sides of SR 99 because elevated tracks would take up and block visibility of important commercial frontage and diminish the value of commercial properties behind them. The City also is opposed to an I-5 station at Kent-Des Moines because of significantly diminished TOD potential and access to Highline College.</p>	

**Response to Comment LJ14-23**

Please refer to response to comment LJ14-10.

# Letter FW197

City of Kent

Page 1

50

1 Does that sound familiar? No. Okay.

2 Up next is Suzette Cooke. Please state your  
3 name and spell your last name.

4 MS. COOKE: Thank you. Suzette Cooke,

5 C-o-o-k-e. Mayor for the City of Kent. And so, first  
6 of all, the city is very excited to know that Sound  
7 Transit Link Light Rail is actually going to be a  
8 reality in some of our lifetimes. This is something  
9 we've been anxious for, for quite some time.

10 **105-1** It was considered as a major part of a unique  
11 planning process that Kent did with the City of Des  
12 Moines. It is part of our Kent/Midway Subarea Plan, and  
13 Link Light Rail played a major part in recognizing the  
14 vibrancy that would come to this area with the  
15 connection of light rail.

16 Key to our goal is to maximize the access to  
17 Highline College as part of that, while at the same time  
18 including safety and good design within the alignment  
19 and the station. We want to -- And this community  
20 deserves a flourishing economy. So that's where the  
21 transit-oriented development portion of where the  
22 station is located becomes so critical.

23 **205-2** It is not a positive to have the alignment --  
24 the structure of the rail line itself -- go in front of  
25 a business, next to a business, next to an apartment.

## *Response to Comment LJ5-1*

Please see the response to comment LJ1-1 of letter FW117.

## *Response to Comment LJ5-2*

Please see response to Common Comment 11 in Table 9-6 of Chapter 9 of the Final EIS.

1 That alignment portion is not the key element. It's  
 2 where the station is located. So, therefore, the City  
 3 of Kent is supporting an I-5 Alignment as the most  
 4 practical approach -- with the station located between  
 5 Highway 99 -- on the east side of 99 and west of 30th;  
 6 so somewhere within that vicinity. So it is still  
 7 within practical walking distance to Highline students.

8 Additionally, as we look at maximizing the  
 9 safety, we are very -- very -- we feel it's very  
 10 important to have access from an elevated station -- not  
 11 at ground level -- because of the safety factors and an  
 12 elevated walkway from that station across Highway 99 to  
 13 the campus. That elevated walkway, by the way, needs to  
 14 be covered; so, a covered elevated walkway. That's the  
 15 ideal setup.

16 So, in summary, we are "no" to a Highway 99  
 17 Alignment; "yes" to an I-5 Alignment, with the caveat  
 18 that an elevated station be located between the east  
 19 side of Highway 99 and the west side of 30th.

20 MS. STRAUZ-CLARK: Okay. Next up is Deana  
 21 Rader followed by Matt P-u-e-t-z. I apologize -- the  
 22 spelling.

23 Please state your name and spell your last  
 24 name.

25 MS. RADER: Deana Rader, R-a-d-e-r. I'm also

**Response to Comment LJ5-3**

Please see responses to Common Comments 4 and 7.

**Response to Comment LJ5-4**

The Preferred Kent/Des Moines Station is on the west side of 30th Avenue S.

# Letter FW356

Highline College

## Page 1



May 22, 2015

Federal Way Link Extension Draft EIS Comments  
Sound Transit  
401 South Jackson Street  
Seattle, WA 98104-9699

RE: Draft EIS Comments and Project Support for Federal Way Link Extension

Dear Sound Transit Board of Directors:

LJ11-1 Highline College fully supports the Federal Way Link Extension plan to provide access for residents of South King County to the region's fast, frequent and reliable light rail system. As a major higher education institution located directly along the proposed Link Extension, we strongly urge Sound Transit to locate the Highline College station on the west side of Pacific Highway South (SR 99), immediately adjacent to the college. As an alternative to this location, the college also supports a "trench" station located directly on the College's parking lot nearest to SR 99.

LJ11-2 The Highline College station also offers a unique opportunity. As the King County's own *Equity and Social Justice Annual Report* series indicates, equity for the economically disadvantaged is a significant concern for Sound Transit, and for the County.

LJ11-3 Highline College is a major destination for the Link Extension ridership. The College has nearly 1,000 employees serving a diverse population of over 16,500 students from throughout King County. In addition, Highline's many community partnerships bring hundreds of people from the surrounding communities to campus on a daily basis. These partnerships include:

- Central Washington University: Central's Des Moines Center at Highline supports over 700 area students pursuing Bachelor's and Master's degrees.
- Working Families Success Network: Highline College partnership with community-based organizations and non-profit agencies provides a variety of services to economically disadvantaged residents.
- Small Business Development Center and Micro-enterprise Programs: these programs help low-income entrepreneurs gain skills necessary to start successful small businesses in our community.
- King County Developmental Disabilities: this contracted program serves developmentally disabled adults by providing access to higher education, job and life skills training, and employment support.
- General Community: Highline College welcomes community members who utilize the college's library, state-of-the-art running track, and attend dozens of cultural enrichment programs offered by the college each quarter.

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### *Response to Comment LJ11-1*

Your support for a station on the west side of SR 99, immediately adjacent to the college, or a trench station under the college parking lot, has been noted. Please see response to Common Comment 11 in Table 9-6 of Chapter 9 of the Final EIS.

### *Response to Comment LJ11-2*

Please see response to comment LJ2-2 of letter FW134.

### *Response to Comment LJ11-3*

Please see response to Common Comment 4.

LJ11-3 Because of Highline’s status as a major destination in South King County, it is most logical to locate the Link station on or immediately adjacent to the campus to ensure safe, secure, and direct access for our students, employees, and visitors. A Highline College station located either adjacent to or directly on campus would potentially attract more ridership per day than any of the other currently proposed locations.

Highline College leadership, along with students, faculty, staff and community members, strongly urges Sound Transit to consider the following comments and recommendations in your determination of the location of the Kent/Des Moines link station:

- The Highline College core campus is located about a block west of Pacific Highway South mostly on a hillside extending approximately 0.5 mile west to 20<sup>th</sup> Avenue South and extending approximately 0.25 mile north/south between South 236<sup>th</sup> Street and South 240<sup>th</sup> Street. A key measure of access for the station options is the distance from a proposed station to the center of campus, not just to the edge of the campus. The college serves a diverse population with a wide range of abilities and age groups (as described in the attached flyer). Safe, secure and direct access to the station from the campus is a critical need for the college.
- Highline College is a destination stop in South King County that serves a large population from economically disadvantaged backgrounds. We believe that it is vitally important to support equity for South King County residents by improving access to the College and other services offered by the College.
- A Highline College station location either adjacent to or directly on campus would reduce vehicle traffic and congestion around the College and the Kent/Des Moines area. With increased rail ridership to and from the College, the station would directly contribute to reducing the carbon emissions and footprint and improving the quality of residential life in the areas surrounding the campus.
- The Highline College rail station will be a major part of the infrastructure of the Link System and will likely serve the region for the next 50 years and beyond. It is critical for Sound Transit to consider both the long-term impacts as well as the short-term impacts in making this important decision.

LJ11-4

Highline College does not support any Kent/Des Moines station option away from SR 99 or beyond 0.25 mile from the center of campus. These more distant locations present significant challenges and obstacles in terms of safe and direct access for our students, employees, and community members, many of whom have limited mobility. More specifically, Highline College strongly opposes the following locations:

- 30<sup>th</sup> Avenue East or West Station
- I-5 Station – elevated
- Lowe’s Station – at-grade

LJ11-5

Highline College also does not support a station on the east side of SR 99 due to safety concerns. While this location is closer to the College compared to the 30<sup>th</sup> Ave, I-5, or Lowe’s options, our students, employees, and visitors would still need to cross heavy vehicular traffic on SR 99 to get to the campus.

LJ11-6

Page | 2

**Response to Comment LJ11-4**

Sound Transit appreciates the cooperation and assistance of Highline College in addressing these issues following the Draft EIS, including at the series of stakeholder workshops held in August and September 2015, where workshop participants reached consensus on design refinements for the Preferred Kent/Des Moines Station. Please see Section 2.1 of Chapter 2, Alternatives Considered, of the Final EIS and response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS for additional information about the station refinements. Chapter 7, Environmental Justice, describes how the project would benefit all populations, including low-income and minority populations. Benefits include improved access to transit and increased transit reliability with the Kent/Des Moines Station. Please see also response to Common Comment 8. Chapter 3, Transportation, describes changes in traffic patterns, circulation, and safety for vehicles and non-motorized users with the project. Chapter 8, Alternatives Evaluation, describes the trade-offs in impacts and benefits among the FWLE alternatives.

**Response to Comment LJ11-5**

Please see response to comment LJ2-1 in letter FW134. The Preferred Kent/Des Moines Station would be on the west side of 30th Avenue S, within 0.25 mile of Highline College.

**Response to Comment LJ11-6**

Please see response to Common Comment 4 regarding safe access to Highline College and the need for a pedestrian bridge.

LJ11-6 While an elevated pedestrian pathway would allow safer crossing of SR 99, such a structure would not only increase the distance to the college, it would likely increase the construction costs of the station as well.

Station Location Recommendations

- LJ11-7 • A Highline College station must be located as close to Highline College as possible. An elevated station on the west side of Pacific Highway South (SR 99) adjacent to Highline College, at the approximate corner of South 236<sup>th</sup> Street, makes the most sense for the college and the community.
- As an alternate location, Highline College also supports a station via a trench directly on the College parking lot nearest to the corner of Pacific Highway South and South 236<sup>th</sup>. This location provides the most direct access to the Highline College campus, although admittedly such underground station would be the more expensive of the options.

LJ11-8 Highline College takes a neutral position on the rail alignment from South 200<sup>th</sup> Street to the college. Provided the route reaches the west side of SR 99 for the Highline College station, the College has no preference on either the I-5 or the SR 99 alignment. It is however our preference for the light rail alignment to continue south from Highline College along SR 99 to Federal Way.

LJ11-9 As noted, Highline College is a strong supporter of the Federal Way Link Extension plan for a station located at the college, and we appreciate the opportunity to comment on the DEIS. We strongly urge Sound Transit to be visionary in the selection of station locations that will provide the most effective transit access for the residents of South King County, including the students and employees at Highline College. We look forward to working with Sound Transit as the project moves forward.

Sincerely,



Jack Birmingham, PhD  
President  
Highline College  
PO Box 98000  
Des Moines, WA 98198-9800

This letter is submitted in concurrence with the intention and support of the Board of Trustees of Highline College.

Attachments (Highline College Facts & Information, Student Equity Statistics, KC Equity & Social Justice Annual Report – November 2014, and DEIS Comments)

**Response to Comment LJ11-7**

Your support for an elevated station on the west side of SR 99 or a trench has been noted.

**Response to Comment LJ11-8**

Your preference for the FWLE to continue to Federal Way on SR 99 has been noted.

**Response to Comment LJ11-9**

All FWLE alternatives would provide access to Highline College with the Kent/Des Moines Station. Sound Transit will continue to coordinate with Highline College and other stakeholders on development of this station throughout preliminary and final design.

DEIS Comments

The DEIS transportation safety analysis evaluates traffic collision data for the corridor and station areas. This collision data does not reflect the many traffic accidents that go unreported and it does not reflect the increased potential for conflict between pedestrians and vehicles at the signalized intersections. Pedestrian volumes will increase near the station to support the expected ridership at the Kent/Des Moines light rail station and with that increase in pedestrian traffic will come the increased potential for conflicts and collisions.

For any stations selected for the Kent/Des Moines service to Highline College, there must be safe facilities for riders boarding and deboarding buses and crossing streets to reach the light rail station. For any station to the east of Pacific Highway S (median station and to the east), we recommend a grade-separated pedestrian and bicycle pathway over Pacific Highway South (SR 99) or an exclusive pedestrian/bicycle signalized crossing (away from any driveway or intersection).

LJ11-10 With a forecasted 2,500-3,000 boardings per day at the Kent/Des Moines station, we can expect 300 boardings in the PM peak hour plus an estimated 200-300 alighting passengers departing the light rail. As outlined in the DEIS Chapter 3 document, mitigation for degraded intersection operation (poor level of service) on SR 99 would include widening for additional right turn lanes at South 240<sup>th</sup> Street and at Kent-Des Moines Road. This widening would increase the crossing distance and crossing time for pedestrians at the traffic signal and increase the potential conflicts between pedestrians and vehicles at the intersections. We recommend that the station incorporate a covered pedestrian bridge over Pacific Highway South (SR 99) to improve safety for pedestrian access, provide for an all-weather connection and accommodate the high volumes of riders between Highline College campus and the light rail station, pedestrians coming and going throughout the day. A pedestrian bridge over Pacific Highway S (SR 99) for station access would improve safety for pedestrian and bicyclist access, would improve travel time for station access and reduce delays for pedestrians to access the station, would improve all-season access and security for the connection between campus and station and would also improve connectivity between the college, Link station and Rapid Ride stations on both sides of SR-99.

LJ11-11 Local bus service will continue to be important to the students, faculty and staff of Highline College, to complement the light rail service proposed. Current bus service to Highline College is provided along Pacific Highway South (SR 99) with the King County Rapid Ride A Line, King County Routes 121, 122 and 156 with access on campus near Building 29 and Route 166 with access on campus at the horseshoe loop from S 240<sup>th</sup> Street. The on campus bus routing is important for both convenient access for students to transit but also for bus layover function, a critical element to the local transit serving both the college campus and the proposed Kent/Des Moines Link station. Highline College recommends that local transit continue to serve Highline students, staff and faculty with on-campus service and layover function as well as with a direct connection to the Rapid Ride A Line stations on Pacific Highway S.

**Response to Comment LJ11-10**

Please see response to Common Comment 4. Chapter 3 of the Final EIS describes the transportation system including the proposed roadways system, motorized and non-motorized station access, and parking. This chapter also includes the results of traffic and safety analyses in the station areas.

**Response to Comment LJ11-11**

Sound Transit coordinated with King County Metro to develop a conceptual transit plan for each of the project stations. This plan is included in Section 4.2.1 of the Transportation Technical Report, Appendix G1 of the Final EIS. This plan assumes that bus service to the college will remain.

**EQUITY BY DESIGN AND WITH COMMUNITY**

A dedicated Design Committee, co-sponsored by The Seattle Foundation and King County, was formed in spring of 2014 to help develop and refine the initiative's larger framework. The formation of this committee represents a change in how King County has previously engaged communities in local initiatives. From the start, community-based organizations and champions of equity have been part of this Design Committee and driving the strategies and investments.

**“We need to change the way institutions and communities work together. People are more engaged in developing strategies for change when they feel they own more of the change in their community,”**

said Sili Savusa, Executive Director of White Center Community Development Association and member of the Communities of Opportunity Design Committee.

**KING COUNTY HEALTH, HOUSING AND ECONOMIC OPPORTUNITY MEASURES**

**LEGEND**



**RANKING**

Census Tracts ranked by an index of health, housing and economic opportunity measures.

**POPULATION MEASURES**

Dark red areas populations most impacted	Dark blue areas populations least impacted	
Life expectancy	74 years	87 years

**Health, broadly defined:**

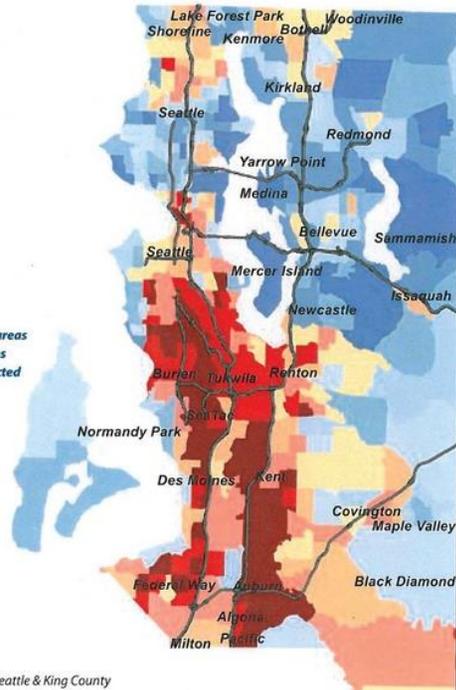
Adverse childhood experiences	20%	9%
Frequent mental distress	14%	4%
Smoking	20%	5%
Obesity	33%	14%
Diabetes	13%	5%
Preventable hospitalizations	1.0%	0.4%

**Housing:**

Poor housing condition	8%	0%
------------------------	----	----

**Economic opportunity:**

Low-income, below 200% poverty	54%	6%
Unemployment	13%	3%



Data Source: U.S. Census Bureau / Produced by: Public Health - Seattle & King County

No Comments

*No Comments*



#### STUDENT EQUITY STATISTICS

Highline College has been proud to call South King County home since 1961. As the first community college in King County, Highline paved the way for other two-year colleges to follow.

Nearly 16,500 students attend Highline each year. Of those 16,500 students, 85% come from cities in its service area in the South King County region, including Auburn, Burien, Des Moines, Federal Way, Kent, SeaTac, and Tukwila.

The college serves a community that includes a concentration of low- to moderate-income housing, a feature that has made South King County the residence of choice for many of the region's newer residents, immigrants, and young families.

#### LOW EDUCATIONAL ATTAINMENT

- Highline's service area high school dropout rate is 77% higher than the average for King County
- Only 58.3% of Highline's service area residents go to college, compared to 75% in King County
- Highline serves over 2,000 people each quarter in Adult Basic Education or English-as-a-Second Language programs

#### FINANCIALLY DISADVANTAGED

- Over 51% of Highline students receive some sort of need-based aid (2013-14)
  - \$4.3 million in State Need Grants went to 2,067 Highline students
  - 626 Highline students eligible but went unserved due to lack of State Need Grant funding
- 3,444 Highline students received \$10.1 million in federal financial aid (2012-13)
- 27% of Highline students have children to support
- 72% of Highline's degree seeking students are low income, first-generation, or disabled
- For all K12 students in King County, 36% receive free and reduced-price lunches. In Highline's feeder districts the number are much higher:
  - 56% of students in Federal Way
  - 68% in Highline
  - 73% in Tukwila

#### DIVERSE

- Highline is Washington's most diverse institution of higher education with over 70% students of color
- For over 50% of Highline students, English is not their native language
- Over 150 different languages spoken



**Recent Notable Achievements and Awards**

Highline's commitment to diversity, social justice and multiculturalism earned the college awards and recognition in 2014.

Highline received the prestigious Award of Excellence from the American Association of Community Colleges for increasing diversity and social equity on campus. Highline is one of six colleges in the nation to earn recognition in 2014. The award is given to colleges for their ongoing practice that best student achievement and help meet America's economic and workforce needs.

For the second straight year, Highline received the Higher Education Excellence Award from the American Association of Educators. The award honors colleges and universities that demonstrate an outstanding commitment to diversity and inclusion. Given by Insight into Diversity, the largest and oldest diversity magazine and website in higher education, the 2014 HEED Award was presented to only 82 institutions across the nation. Highline was the only community college recipient from Washington state and one of the very few from the West Coast.

Highline also earned national recognition from Community College Week as one of the top 100 associate degree producers in 2014. Highline ranked 48th out of the top 100 associate degree producers in the Asian American student category. The college had a 9 percent increase in associate degrees awarded to Asian American students between the 2012-13 academic year. Community College Week is an event sponsored by the U.S. Dept. of Education for ethnic rankings.

**Foundation**

Established in 1972, the Highline College Foundation is a nonprofit corporation, governed by a volunteer Board of Directors. As of June 30, 2014, the Foundation's assets were \$4 million. The Foundation supports scholarships, emergency assistance to students, faculty professional development and technology. Under the leadership of the foundation's president, Mark Knutson, and Board of Directors, it is actively expanding its capacity to raise external funds. For the year ending June 30, 2014, it had received a total of \$535,000 in donations and awarded over \$380,000 in scholarships.

**History**

Highline was founded in 1961 as the first community college in King County. It serves approximately 16,000 students and has more than 350,000 alumni. The campus was built in 1964 with additional buildings added in following years to meet student and technology needs.



highline.edu

(206) 878-3710

PO Box 98000

Des Moines, WA 98198-9900

The college provides equal opportunity in education. Any student who faces discrimination on the basis of race, color, national origin, sex, disability, marital status, marital status, creed, religion, or status as a veteran of war, may file a complaint. Grievance procedures include racial harassment. Information should contact CHS services Dept.

ENR 12/14

**About Us**

Highline College is nationally and internationally recognized as a premier community college, a reputation earned through the development of an institutional culture that values innovation, globalization of curriculum and community participation. Highline is one of 34 community and technical colleges in Washington state.

**Location**

Highline's main campus is located on an 80-acre wooded site in the Pacific Northwest, 20 minutes south of downtown Seattle. Perched on a hill in Des Moines, Wash., the main campus overlooks beautiful Puget Sound and the Olympic Mountains. Classes are also offered at the Alaine Science and Technology (AST) Center at Redondo Beach and additional locations in the community.

**Mission Statement**

As a public institution of higher education serving a diverse community in a multicultural world and global economy, Highline College promotes student engagement, learning, and achievement. It integrates diversity and globalism throughout the college's relationships within its communities, and practices sustainability in human resources, operations, and teaching and learning.

**Accreditation**

Highline is accredited by the Northwest Commission on Colleges and Universities, an institutional accrediting body recognized by the Council for Higher Education Accreditation and the United States Department of Education.

**Governance**

Highline is led by President Jack Birmingham, Ph.D., and is governed by a five-member Board of Trustees: Dan Altmyer, Dabrena Jackson-Gundy, Fredrick Mendez, Bob Beegler and Sil Svava. Faculty members are actively involved in campus governance.

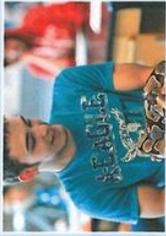
HIGHLINE COLLEGE

Facts and Information 2015



highline.edu

No Comments

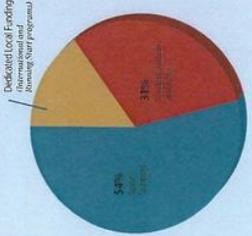


**Economic Benefits of International Students**

The organization IIEA, Association of International Educators estimated that international students and their families generated approximately \$1.45 billion to Washington state's economy for the 2012-13 academic year, which included the \$1.2 billion in direct jobs in the 5th Congressional District. Highline and District 5th combined contributed approximately \$10.7 million to the local economy this year through tuition costs and living expenses.

**Highline's Funding Sources**

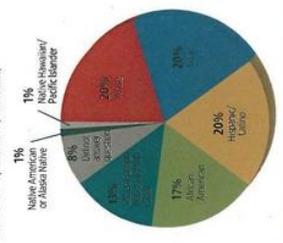
For the 2013-14 academic year, Highline received \$39.7 million in funding.



**Quarterly Tuition (2013-14 academic year)**  
 Resident (full time/15 credits): \$1,331.35  
 Nonresident (full time/15 credits): \$3,078.40

**Student Profile (2013-14 academic year)**  
 Total credit and non-credit students: 16,493 (15% female, 42% male)  
 Total credit students: 10,048 (65% or all students)  
 Median age of credit students: 23  
 Total number of international students: 717  
 Total number of returning start students: 1,779

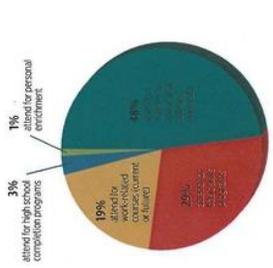
**Ethnicity of the Student Population (state funded)**



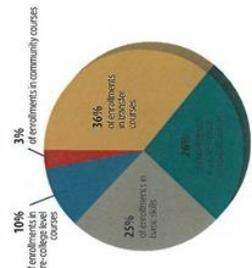
**Did You Know?**

During 2013-14, Highline served more students in adult basic education (ABE) courses than any other community or technical college. Statewide, 19,570 students enrolled in ABE courses, with 2,043—or 10.2%—of those at Highline.

**Why Students Enroll at Highline**



**Type of Course Enrollments**



\*New data source: SACCTC. Based on a prioritized course type report for purposes for enrollment.

**Serving Our Community**

Approximately 92 percent of Highline's students come from King County. The balance comes from neighboring counties.

**Highline Students by City**

City	Count	Percentage
Federal Way	3,378	20.7%
Kent	2,941	18.0%
SeaTac	2,240	13.7%
Des Moines	2,009	12.4%
Auburn	1,338	8.2%
Burien	1,159	7.1%
Seattle metro	828	5.1%
Tacoma metro	662	4.1%
Renton	578	3.5%
Tukwila	164	1.0%
Other (cities <1%)	1,175	7.1%

**Employment**

As a major employer in Des Moines, Highline employs 1,060 people who serve students at multiple locations throughout King County. About 80 percent, or 845, of these dedicated professionals live and pay taxes in King County.

**Degrees and Programs**

Highline offers comprehensive community college programs as well as new applied bachelor's degrees in four high-demand programs: Cybersecurity and Forensics, Global Trade and Logistics, Respiratory Care, and Youth Development. Highline's associate degrees provide preparation for transfer to four-year colleges or universities. The college offers applied associate degree and/or certificates in more than 50 professional-technical education programs, designed to help students succeed in today's marketplace. Students also come to Highline for pre-college, basic education and short-term training programs as well as continuing education.

No Comments

# Letter FW603

Highline College

Page 1

## Response to Comment LJ16-1

Thank you for the important information about the diversity in the Highline College community. Please see response to comment LJ2-2 of letter FW134.

From: [Birmingham\\_jack](#)  
To: [FW.E](#)  
Subject: Public comment regarding Project Support for Federal Way Link Extension  
Date: Tuesday, May 26, 2015 3:55:32 PM  
Attachments: [image005.png](#)  
[image005.png](#)  
[FW.E Comments - J Birmingham Highline College.pdf](#)



May 26, 2015

Dear Sound Transit Board of Directors:

Equity for the economically disadvantaged is a significant concern for Sound Transit and the County. The attached documents support these issues.

As the King County's own Equity and Social Justice Annual Report series makes clear, the southwest suburbs remain among the most distinctly distressed areas in our region. Over time, the number of economically disadvantaged residents has continued to increase in South King County. Highline's student population reflects these social and economic challenges, as a few data-points illustrate:

- 72% of Highline's degree-seeking students are low-income, first-generation, or disabled.
- A majority of Highline's students receive need-based financial aid.
- Highline College serves over 2,000 students on a quarterly basis in the Adult Basic Education or English as Second Language programs.
- The number of local school districts in Highline College's service area has significantly high rates for its free and reduced student lunch program.
  - o Tukwila School District - 73% of students receive free and reduced lunches
  - o Highline Public School District - 68%
  - o Federal Way Public Schools - 56%

LJ16-1

The average rate for the free and reduced lunch program for all of King County which includes the above three districts is 36%.

In light of these troubling figures, your opportunity to place a station on the west side of SR 99 is a fundamental equity issue for our district.

- No other station in the south county, aside from this Highline College campus station, provides the ACCESS necessary for higher education and educational advancement for the region's many economically disadvantaged communities.
- No other station is a DESTINATION that — for the next 50-plus years — will serve this disproportion of economically disadvantaged.
- No other station can serve as a GATEWAY of opportunity for our next generation.

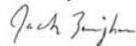
who will stop at Highline acquire an education and skills for mobility out of poverty and self-sufficiency.

U16-1 The resources on the campus extend beyond the Highline's alone. The college has already launched efforts to include more community-based organizations as service-providers on its campus. Furthermore, the presence of Central Washington University's Center will continue to draw more people onto the campus in the future.

The students, faculty, staff, and administration of Highline College strongly support locating the future Highline College station on the west side of Pacific Highway South or directly on campus. This location of the light rail station is critical in addressing the equity issues in education access and economics for the residents of South King County.

We respectfully submit this email as an Addendum to the Highline College's comment letter that was express mailed last Friday, May 22, 2015.

Sincerely,



Jack Bermingham, Ph.D.  
President  
Highline College

*Patti Rosendahl*

Executive Assistant to the President  
Highline College  
PO Box 98000  
Des Moines, WA 98198-9800  
Phone: (206) 592-3200  
[prosendahl@highline.edu](mailto:prosendahl@highline.edu)

# Letter FW134

Highline College

Page 1

17

1 Des Moines really needs that 216 stop, although we're  
2 kind of ignored most of the time since we're so small  
3 and so disadvantaged. We need every boost we can get.  
4 And having that stop is important to our leaders, and  
5 it's important to our city's growth.

6 And we just put in a million dollars down the  
7 middle, and I know we don't want to disrupt that. But I  
8 still feel, in the long run, sending it down 99 will  
9 connect all the cities together -- shopping -- People  
10 are not going to use the buses. There will never be  
11 enough parking or safe parking. It's got to be  
12 convenient for the masses -- down 99 -- with all four  
13 stops. Thank you.

14 MS. STRAUZ-CLARK: Okay. Next up is Jack  
15 Bermingham, followed by Rebecca Martin and Tracy Hills.

16 Please state your name for the record and  
17 spell your last name.

18 MR. BERMINGHAM: Good evening. My name is  
19 Jack Bermingham, B-e-r-m-i-n-g-h-a-m. I'm the President  
20 of Highline College, and I wanted to talk tonight about  
21 the station location at Highline College.

22 First and foremost, light rail needs to be  
23 about moving people. All those other factors are maybe  
24 critically important; but, first and foremost, it's  
25 about moving people. And Highline College is a

LJ2-1



## *Response to Comment LJ2-1*

Your support for a Kent/Des Moines Station located on the west side of SR 99 has been noted. Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS. Please also see Section 2.1 of Chapter 2, Alternatives Considered, of the Final EIS, which describes the stakeholder process for identifying the Preferred Kent/Des Moines Station. Highline College was a key stakeholder participant in that process.

1 destination. People are coming to the colleges; not a  
2 station stop. Employees, students come to the college  
3 every day.

4 We have about 17,000 different people who come  
5 to the college over the course of the year as students.  
6 And we have quite a number of employees. Having the  
7 station, whether you are coming from the north end or  
8 the south end, right near the college -- ideally, on the  
9 west side of 99 -- is the best location that meets the  
10 needs of our people.

11 And when we look at our communities, the great  
12 thing about community colleges is they're about equity;  
13 they're about access. They're about an opportunity for  
14 people who come from disadvantaged backgrounds. So to  
15 put a station at a place near the college that does not  
16 meet that purpose, further inhibits equity and access.

17 It also comes from the south end, right? So  
18 right now we have 3,300-plus students from Federal Way  
19 that are coming to the college. Almost 100 full-time  
20 employees live in Federal Way that will come to the  
21 college. This location of the station is critical,  
22 however you do the alignment. The location of the  
23 station needs to be at the college.

24 Thank you for allowing me to comment.

25 MS. STRAUSS-CLARK: I'm just going to pause

**Response to Comment LJ2-2**

Chapter 7, Environmental Justice, describes how the project would benefit and impact all populations, including low-income and minority populations. Benefits include improved access to transit and increased transit reliability. This chapter also describes the targeted outreach efforts by Sound Transit conducted throughout the EIS process. Please see responses to Common Comments 4 and 8.

**Response to Comment LJ2-3**

After an extensive stakeholder process requested by the Sound Transit Board, the preferred location of the Kent/Des Moines Station was identified on the west side of 30th Avenue S. Please see response to Common Comment 4.

# Letter FW193

Highline College

Page 1

42

1 at I-5, which would serve a lot of people -- shoppers  
2 and particularly the 17,000 students at the college.

3 And I think it might be good for you to be  
4 able to walk three or four blocks rather than one. That  
5 would be good for your health. So, hopefully, that  
6 would be a compromise for the students here. Thank you.

7 UNIDENTIFIED SPEAKER: It's on a hill.

8 MS. STRAUSS-CLARK: Up next is Jack  
9 Bermingham, followed by Evon Hampton, followed by Denny  
10 Steussy.

11 Please state your name and spell your last  
12 name.

13 MR. BERMINGHAM: Jack Bermingham,  
14 B-e-r-m-i-n-g-h-a-m. I'm President at the College here.  
15 Welcome. I appreciate you holding this event at the  
16 College and giving so many of our local residents and  
17 students and faculty and staff an opportunity to speak  
18 tonight. My board met this morning, and they are not  
19 ready to state a full position.

20 But we all want to be clear that, in terms of  
21 locating a station, we are very adamant about the need  
22 to have the station very close to the College. Ideally,  
23 on the west side of 99; but if not, certainly on the  
24 east side of 99 and no farther away.

25 If you think about South King County and you

LJ4-2

## *Response to Comment LJ4-1*

Please see the response to comment LJ2-1 in letter FW134.

## *Response to Comment LJ4-2*

Please see the response to comment LJ2-2 in letter FW134.

1 think about the demographics and fundamental equity  
2 issues, the one stop that you have in South King County  
3 that you know that you are bringing a significant group  
4 of people from disadvantaged economic backgrounds and  
5 people who have been marginalized in our society is  
6 Highline College.

7           They come to an open-access institution. If  
8 you look at our demographics, however you slice and dice  
9 them, that's true. And the question is: To what extent  
10 are other priorities going to marginalize those students  
11 by putting the stop somewhere other than right next to  
12 the college, where it's convenient for them as not just  
13 a stop but a destination?

14           This becomes an important equity issue in the  
15 south end of the county, where we have had lots of  
16 equity issues and where our population has been  
17 consistently marginalized in many ways --  
18 unintentionally or intentionally.

19           This is one of the opportunities to provide  
20 with new infrastructure, infrastructure that speaks to  
21 our needs. And it is fundamentally an equity issue in  
22 that regard. Thank you.

23           MS. STRAUSZ-CLARK: Up next is Evon Hampton,  
24 followed by Denny Steussy, followed by William Cho.

25           Please state your name and spell your last

# Letter FW290

City of Des Moines

Page 1



May 14, 2015

Dow Constantine  
Chair, Sound Transit Board  
401 S. Jackson St  
Seattle, WA 98104-2826

Dear Chair Constantine:

The City of Des Moines is writing the Sound Transit Board to forward City Council Resolution No. 1297 adopted by the Des Moines City Council on May 7, 2015. The City will also be submitting Federal Way Link Extension (FWLE) DEIS formal review comments by separate letter.

LJ6-1 Resolution No. 1297 recommends a Preferred FWLE Alignment along SR 509 and I-5, with a Kent/Des Moines Station somewhere between the west side of 30<sup>th</sup> Avenue South and the east side of SR 99, with pedestrian access from the Station to Highline College by an elevated pedestrian/bicycle bridge from east of SR 99 to the College.

We also propose that Sound Transit, Highline College and the cities enter into a formal agreement committing to joint planning, design, construction and operations once a Preferred Alternative is identified by the Sound Transit Board to ensure that:

- LJ6-2
- a. disruptions to property owners, businesses and residents are minimized,
  - b. the highest levels of urban land use and design are achieved,
  - c. transit oriented development is maximized,
  - d. impacts to existing commercial businesses and future commercial development are minimized, and
  - e. Highline College current operations, its students and future development, including pedestrian, transit and vehicular access, are not diminished but enhanced to the extent possible.

Very truly yours,

A handwritten signature in blue ink that reads 'Dave Kaplan'.

Dave Kaplan  
Des Moines Mayor

Cc: Des Moines City Council  
Tony Piasecki, Des Moines City Manager

## *Response to Comment LJ6-1*

Your recommendation for the Preferred Alternative has been noted. Please see responses to Common Comments 4 and 11 in Table 9-6 of Chapter 9 of the Final EIS.

## *Response to Comment LJ6-2*

As you suggest, Sound Transit typically enters into agreements with jurisdictions related to capital projects after the Sound Transit Board selects an alternative to build. Extensive coordination with the City of Des Moines, Highline College, and other stakeholders started several years ago and has been especially thorough about the design of the Preferred Alternative near the college. The Final EIS describes how impacts would be avoided or minimized and how unavoidable impacts would be mitigated. These commitments will be reflected in FTA's Record of Decision, and may be also reflected in any future agreements between Sound Transit and project partners.

*No Comments*

RESOLUTION NO. 1297

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF DES MOINES, WASHINGTON, to the Sound Transit Board recommending a Preferred Alignment and Kent-Des Moines Station location for the Federal Way Link Extension (FWLE), and expressing the Council's intent for City staff and City Council to work cooperatively with Sound Transit, the City of Kent, Highline College and other cities (Agencies) along the FWLE corridor to coordinate transportation and land use planning and development efforts to realize the best possible outcomes for all affected parties.

WHEREAS, in 2008 voters authorized Sound Transit to proceed with the expansion of their Link Light Rail System to include service from the South 200<sup>th</sup> Street Station in SeaTac to South 272<sup>nd</sup> Street under the Sound Transit 2 Plan, and

WHEREAS, the FWLE project crosses the boundaries of SeaTac, Des Moines, Kent and Federal Way and the City of Des Moines seeks to work cooperatively with Highline College to support the College, its students and operations, to minimize disruptions to property owners, businesses and residents, minimize adverse aesthetic, economic and environmental impacts, and provide safe vehicular and pedestrian access, utilities and aesthetic improvements along the corridor and within the station areas to support these goals, and

WHEREAS, the Cities of Des Moines and Kent (Cities) and Highline College anticipate significant transit oriented development in the Midway area as a result of the Sound Transit FLWE Kent-Des Moines Station that will significantly affect each City's land use, zoning, transportation system, residents, businesses, and Highline College, and

WHEREAS, the City of Des Moines expresses its intent to continue to work cooperatively to provide for development in a way to meet the operational and development needs and timetables of each Agency, and proposes to enter into more formal agreements for planning, design, construction and project mitigation, and

WHEREAS, City of Des Moines proposes that the Agencies agree to jointly pursue grant opportunities through State and Federal sources and supplemental funding sources, now therefore,

*No Comments*

Resolution No. 1297  
Page 2 of 3

THE CITY COUNCIL OF THE CITY OF DES MOINES RESOLVES AS FOLLOWS:

Sec. 1. That the City of Des Moines, having evaluated the environmental impacts associated with each of the alignment alternatives and station options in the FWLE Draft Environmental Impact Statement (DEIS), recommends that the Sound Transit Board identify SR 509/I-5 as the Preferred Alternative Alignment to Federal Way with the Kent-Des Moines Station between 30<sup>th</sup> Avenue and SR 99 and returning to an I-5 alignment east of Lowe's, with the following additional recommendations that:

(1) The alignment be designed to minimize impacts to commercial and residential properties and maximize future development to the extent possible;

(2) The guideway alignment serve as an integrating urban design feature to the extent possible, not a structure that creates a visual or functional barrier to either Midway or to Highline College;

(3) The Kent-Des Moines Station be designed to enhance the development potential of Midway and properties fronting on Pacific Highway South (State Route 99);

(4) 236<sup>th</sup> Lane, both east and west of SR 99, be designed and fully developed to serve as a gateway to Highline College, the Kent-Des Moines Station depending on its location, and to Kent's Midway transit-oriented development area;

(5) Primary pedestrian access from the Kent-Des Moines Station to Highline College be by an elevated pedestrian/bicycle bridge from the Station across SR 99 to the College to make access as safe and convenient as possible, and to minimize vehicular and transit traffic impacts on SR 99;

(6) Direct public transportation transit access to the College campus not be compromised; and

(7) Traffic circulation at the I-5/Kent Des Moines (KDM) Road interchange and intersections at SR 99/KDM, 236<sup>th</sup> Lane/SR 99 and 240<sup>th</sup>/SR 99 be designed or mitigated in ways to maintain traffic capacity in both Kent and Des Moines and along Kent Des

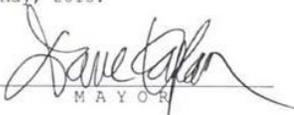
No Comments

Resolution No. 1297  
Page 3 of 3

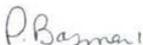
Moines Road, SR 99, South 240<sup>th</sup> Street, and other impacted transportation corridors.

**Sec. 2.** That the City of Des Moines, proposes to Sound Transit, the City of Kent and Highline College, that the four agencies (and perhaps other agencies) enter into a formal agreement committing to joint planning, design, construction and operations once a Preferred Alternative is identified by the Sound Transit Board to address mutual and respective goals and to ensure (a) the highest levels of urban land use and design are achieved, (b) transit oriented development is maximized, (c) impacts to existing commercial businesses and future commercial development are minimized, and (d) Highline College current operations and future development, including pedestrian, transit and vehicular access, are enhanced to the extent possible.

**ADOPTED BY** the City Council of the City of Des Moines, Washington this 7th day of May, 2015 and signed in authentication thereof this 7th day of May, 2015.

  
M A Y O R

APPROVED AS TO FORM:

  
City Attorney

ATTEST:

  
City Clerk

I, Bonnie Wilkins, City Clerk, do hereby certify that the foregoing is a true and correct copy of the original instrument on file and of record in my office in Des Moines, Washington 98198



## Letter FW543

City of Des Moines

*No Comments*

### Page 1

**From:** [Dan Brewer](#)  
**To:** [FWLE](#)  
**Subject:** City of Des Moines Comments  
**Date:** Tuesday, May 26, 2015 3:40:39 PM  
**Attachments:** [City of Des Moines Comments Sound Transit FWLE DRIS.pdf](#)

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Attached are technical review comments from the City of Des Moines on the Federal Way Link Extension Draft EIS.

**Daniel J. Brewer, P.E., P.T.O.E.**  
Planning, Building, and Public Works Director  
21650 11th Avenue South  
Des Moines, WA 98198  
(206) 870-6581



May 26, 2015

Sound Transit  
 Attention: Federal Way Link Extension Draft EIS Comments  
 401 S. Jackson St  
 Seattle, WA 98104-2826

Attached are comments on the FWLE DEIS from the City of Des Moines and a copy of a May 14<sup>th</sup>, 2015 letter sent to Sound Transit Board Chair Constantine by Mayor Dave Kaplan forwarding a copy of Des Moines City Council Resolution No. 1297 recommending a Preferred FWLE Alignment along SR 509 and I-5, with a Kent/Des Moines Station somewhere between the west side of 30th Avenue South and the east side of SR 99, with pedestrian access from the Station to Highline College by an elevated pedestrian/bicycle bridge from east of SR 99 to the College.

Three of the City's technical review comments should be especially noted.

- LJ13-1 1. The DEIS fails to adequately discuss the political issues and feasibility of funding non-voter approved stations at S. 216th and S. 260th versus further extending the FWLE south arguably leading readers to unrealistic expectations of the possibility of stations at S. 216th and S. 260th.
- LJ13-2 2. The DEIS fails to adequately discuss the timing of and quantify the costs associated with impacts on business during construction and to a lesser extent, FWLE operations, the timing of the associated *potential* benefits, and the net present value impacts to both business and city revenues. Given the immediate impact of business interruptions and reduced revenues and the relatively long range *potential* (but somewhat uncertain) future business and city revenue benefits, there would be a negative net present value cost associated with an SR 99 alignment. If the Sound Transit Board is considering the selection of SR 99 as the preferred alignment alternative, this should be further evaluated before a final decision of an SR 99 alignment is made.
- LJ13-3 3. Impacts on 24th Ave S., 16th Ave S. and Marine View Drive associated with SR 99 detours should be more fully evaluated if a SR 99 alternative is identified as the Preferred Alternative.

Moving forward, the City of Des Moines also proposes that Sound Transit, Highline College and the cities enter into a formal agreement committing to joint planning, design, construction and operations once a Preferred Alternative is identified by the Sound Transit Board to ensure that:

LJ13-4

**Response to Comment LJ13-1**

Readers will see in Chapters 2 and 8 of the Final EIS that these stations are not funded in the ST2 or ST3 plans. Section 8.4 discusses funding uncertainties and trade-offs as an area of controversy/issue to be resolved. It also notes that the potential stations would require additional evaluation to determine their consistency with Sound Transit plans.

**Response to Comment LJ13-2**

The Sound Transit Board did not identify an alternative that runs along SR 99 as the Preferred Alternative. Regarding temporary economic impacts anticipated during construction, including those on local businesses and affected jurisdictions, please see Section 5.2.4 in Chapter 5, Construction, which describes how Sound Transit would work with business owners to mitigate construction-period impacts, and Section 4.3, Economics, which describes impacts from property acquisition on cities' tax revenues. Section 4.3 also describes positive indirect impacts related to the potential for TOD and negative indirect impacts from removing commercial development capacity.

**Response to Comment LJ13-3**

The SR 99 Alternative was not identified as the Preferred Alternative. Chapter 5 of the Final EIS and Chapter 5 in Appendix G1 of the Final EIS describe construction traffic for all alternatives.

**Response to Comment LJ13-4**

Please see response to comment LJ6-2 of letter FW290.

U13-4

- a. disruptions to property owners, businesses and residents are minimized,
- b. the highest levels of urban land use and design are achieved,
- c. transit oriented development is maximized,
- d. impacts to existing commercial businesses and future commercial development are minimized, and
- e. Highline College current operations, its students and future development, including pedestrian, transit and vehicular access, are not diminished but enhanced to the extent possible.

Please don't hesitate to call me if you have any questions or would like to discuss our comments in more detail.

Sincerely;



Dan Brewer, PE, PTOE  
SEPA Official  
Planning, Building & Public Works Director

Attachments:

1. FWLE DEIS Technical Review Comments
2. May 14<sup>th</sup>, 2015 Letter from Mayor Dave Kaplan to Sound Transit Board Chair Dow Constantine

Cc: Des Moines City Council  
Tony Piasecki, Des Moines City Manager  
IWG Contacts, Kent, Federal Way, SeaTac & Highline College

Sound Transit Federal Way Link Extension (FWLE)  
Draft EIS  
Public Review April 10 - May 26, 2015

Comments Due to Sound Transit: May 26, 2015  
Send completed comment form to: [FWLE@soundtransit.org](mailto:FWLE@soundtransit.org)

Chapter/Section		Section No.	Page No.	Exhibit/ Table No.	Review Comments	Agency	Reviewer
Executive Summary	LJ13-5	1-5 Alternative	20	Exhibit E5-12	The map shows the SR 99 Alternative, not the I-5 Alternative	Des Moines	Brandon Carver
Areas of Controversy and Issues to Be Resolved	LJ13-5	ES 10	32		With regard to Potential Additional Stations, the discussion should also more clearly describe the decision of using any extra voter approved or federal funds to do what voters approved (i.e., extend to S. 272nd) or what the City of Federal Way badly wants (extend to Federal Way) or the long sought goal of extending to Tacoma versus investing in non-voter approved stations at 216th and/or 260th	Des Moines	Grant Fredricks
	LJ13-6						
3.0 Transportation Environment & Consequences							
Transportation Elements	LJ13-7	3.2	3-4	Exhibit 3-1	No comment - 240th/MVD was requested as a study intersection in the Agency DEIS review.	Des Moines	Brandon Carver
Affected Environment	LJ13-8	3.4	3-10	Table 3-4	Both SeaTac and Des Moines have adopted LOS Standards for the intersection of 216th/SR-99. Des Moines is agency responsible for operations and maintenance	Des Moines	Brandon Carver
Environmental Impacts	LJ13-9	3.5	3-33		The new traffic signal described at South 236th Ln/SR-99 should also be shown as mitigation in Table 3-17 for clarity. Additionally, consideration to a pedestrian grade separated crossing over SR-99 should be a part of the potential mitigation due to the high vehicle ADT on SR-99 and high pedestrian crossing expected if station is east of SR-99	Des Moines	Brandon Carver
	LJ13-10		3-35	Exhibit 3-12	Same comment as above for the I-5 alternative sidewalks are now existing on 24th Ave S between 208th and 216th. The Des Moines Comprehensive Transportation Plan identifies Kent-Des Moines Rd as having sidewalks from SR-99 to MVD. The two corridors of 216th and 240th, have similar future plans for continuous sidewalks to MVD.	Des Moines	Brandon Carver
	LJ13-11		3-52	Exhibit 3-13	Bike lanes are now existing on 24th Ave S between 208th and 216th. No bike route or shoulder exists on South 240th east of 23rd Ave S for w/b and no or minimal bike route/shoulder facility exists for eb east of MVD.	Des Moines	Brandon Carver
	LJ13-12		3-52	Exhibit 3-13	The Barnes Creek Trail extending from 216th eventually to Highline College generally along the old SR 509 right of way should also be shown	Des Moines	Grant Fredricks, Brandon Carver
	LJ13-13		3-55		Consideration to be given to a pedestrian overpass at the Kent/Des Moines Station due to the high number of anticipated pedestrian crossings and vehicle volumes	Des Moines	Brandon Carver
Potential Mitigation Measures	LJ13-14	3.7	3-63	Table 3-17	See comment above for page 3-33 regarding showing the mitigation measure of a new traffic signal at South 236th Ln/SR-99.	Des Moines	Brandon Carver
	LJ13-15		3-63	Table 3-17	For the I-5 at grade station option the second southbound left turn lane would also require widening on SR-99 for both the north and south legs for lane alignment of the through lanes.	Des Moines	Brandon Carver
	LJ13-16	3.7.1	3-62		Mitigation should be provided if any of the Highline College on campus transit stops are relocated to the Kent Des Moines station.	Des Moines	Grant Fredricks
4.0 Affected Environment & Environmental Consequences							
Acquisitions, Displacements	LJ13-17	4.1	4.1-5	Table 4.1-2	It is unclear where are the +1 partial and +1 full multi-family parcel associated with the KDM SR 99 Median Station	Des Moines	Grant Fredricks
	LJ13-18		4.1-5	Table 4.1-2	Regarding the 260th East Station, how can there be +3 residential displacement if there are no additional SF or MF parcels affected?	Des Moines	Grant Fredricks

**Response to Comment LJ13-5**

This map has been corrected in the Final EIS.

**Response to Comment LJ13-6**

Please see response to comment LJ13-1 in this letter.

**Response to Comment LJ13-7**

Based on the methodology outlined in Appendix A (Section A.8.3) of the Transportation Technical Report (Appendix G1 of the Final EIS), potential impacts on this intersection would not meet the thresholds established to be included in the analysis.

**Response to Comment LJ13-8**

Chapter 3 has been revised in the Final EIS and the LOS standard for this intersection is shown for Des Moines only.

**Response to Comment LJ13-9**

Based on conversations Sound Transit had with the City of Des Moines and WSDOT, it seems likely that the signal would be provided regardless of the FWLE project. Therefore, the signal is assumed as part of the No Build conditions in the Final EIS. Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS.

**Response to Comment LJ13-10**

The existing year for purposes of the EIS analysis is 2013. The mapping reflects the data as of 2013.

**Response to Comment LJ13-11**

The existing year for purposes of the EIS analysis is 2013. The mapping reflects the data as of 2013.

**Response to Comment LJ13-12**

This has been added for the Final EIS.

**Page 4 (continued)**

***Response to Comment LJ13-13***

Please see response to Common Comment 4.

***Response to Comment LJ13-14***

Refer to response to comment LJ13-9.

***Response to Comment LJ13-15***

Roadway widening necessary to build project mitigation improvements would be included.

***Response to Comment LJ13-16***

Sound Transit worked with King County Metro to develop a conceptual transit plan for the FWLE stations, which is included in the Transportation Technical Report, Appendix G1 of the Final EIS. It assumes bus service would remain at the college.

***Response to Comment LJ13-17***

Detailed maps of potentially affected properties are provided in Appendix D4.1. The additional full multi-family acquisition is the Briarwood Apartments, and the additional partial multi-family acquisition is the Tip-Top Mobile Home Park.

***Response to Comment LJ13-18***

While the overall number of residential parcels would not change, the actual parcels affected would change, resulting in a larger number of displacements.

LJ13-19	Land Use	General		The zoning for properties along Pacific Highway S have been changed from H-C Highway Commercial to T-C Transit Community and from C-C Community Commercial to W-C Woodmont Commercial. The permitted uses and development capacity has also been increased with these changes.	Des Moines	Denise Lathrop		
		General		The Final EIS should consider any preferred land use that changes associated with the 2015 Comprehensive Plan Update that Des Moines City Council will be considering in June 2015. This includes potential changes to the Preferred Land Use for an area adjacent to SR 99, Highline College, and S 240th Street.	Des Moines	Denise Lathrop		
		General		The Final EIS should include analysis of any new development projects that are currently under review by the City of Des Moines, including Highline Place and Woodmont Recovery Campus.	Des Moines	Denise Lathrop		
		4.2	4.9.9	The Kent/Des Moines SR 99 West Station would be located in both Kent and Des Moines.	Des Moines	Grant Fredricks		
		4.2.4.2	4.2.18	The TOD discussion should be expanded to including timing and tradeoffs. Based on the TOD study, it is unlikely that TOD will occur very soon, but the construction and displacement impacts will be almost immediate. Furthermore, the political reality of diverting funds to non-voter approved stations at 216th and 260th at the expense of further extending the system south to S. 272nd or Federal Way seems unlikely given the strong interest in the City of Federal Way to connect to the system.	Des Moines	Grant Fredricks		
LJ13-23	Economics	4.3	4.3.1	Similar to the TOD comments on 4.2.4.2 above, the potential increased sales and property tax associated with TOD would be many years out probably resulting in a negative net present value of economic benefits to the cities because the near and intermediate term reductions could not be offset by the positive future TOD benefits.	Des Moines	Grant Fredricks		
		4.3.13		Businesses located on the SR 99 alignment in Des Moines which are displaced will more than likely be relocated outside Des Moines and be a permanent sales and B&O tax loss to the City.	Des Moines	Grant Fredricks		
		4.3-15 thru 17		Under "Negative indirect impacts" it should be noted that the introduction of an overhead guideway along SR 99 in Des Moines can serve to further divide the Pacific Ridge neighborhood and further separate the eastern part of the Neighborhood from the rest of the City, and lower the development potential and attractiveness of SR 99 development because of visual and other environmental factors.	Des Moines	Grant Fredricks		
LJ13-26	Social Impacts, Community Facilities & Neighborhoods	4.4.1	4.4.1	Under "Negative indirect impacts" it should be noted that the introduction of an overhead guideway along SR 99 in Des Moines can serve to further divide the Pacific Ridge neighborhood and further separate the eastern part of the Neighborhood from the rest of the City, and lower the development potential and attractiveness of SR 99 development because of visual and other environmental factors. An elevated guideway on or adjacent to SR 99 would have similar effects on community cohesion and the future urban design of Midway in Kent.	Des Moines	Grant Fredricks		
		LJ13-27						
LJ13-28	Public Services, Safety and Security	4.5	4.5-11	In the call out box, note that the PR-C2 Zone no longer exists. The old PR-C1 and PR-C2 zones were consolidated into a single PR-C zone.	Des Moines	Grant Fredricks		
		LJ13-29	4.14	4.14-3	Des Moines has a police department substation at the Redondo Square on S. 272nd.	Des Moines	Grant Fredricks	
LJ13-30	5.0 Construction	Construction Approach	5.1	5.2	General	The last sentence of 5.1.0 says that "specific mitigation measures for identified impacts would be determined through these permitting processes". This appears too late leaving agencies to wait until the last minute to fully understand impacts and negotiate mitigation throughout the design process. A mitigation framework should be in place at the beginning of and throughout the design process and affected agencies should be included in the planning and design.	Des Moines	Andrew Merges, Grant Fredricks

**Response to Comment LJ13-19**

The Final EIS updated the map and description of future land use (zoning) in Section 4.2, Land Use, to reflect the zoning changes. Please note that the section uses generalized zoning in dominant land-use categories so that the land use could be presented consistently across jurisdictions (e.g., single-family residential, multi-family residential, commercial, institutional, mixed-use, parks/open space, industrial, office, and vacant).

**Response to Comment LJ13-20**

The Final EIS has been updated to include the City of Des Moines' revised Comprehensive Plan land use designations adopted in June of 2015.

**Response to Comment LJ13-21**

To update Chapter 6, Cumulative Impacts, for the Final EIS, FWLE project staff and City of Des Moines staff updated the list of reasonably foreseeable future public and private development projects in the Des Moines part of the FWLE study area. These projects were added to the list, although the Woodmont Recovery Campus was removed after the permits were withdrawn for the project. The list of reasonably foreseeable future projects is included in Final EIS Appendix D6.

**Response to Comment LJ13-22**

The text in Section 4.2, Land Use, has been updated as requested.

**Response to Comment LJ13-23**

Please see responses to comments LJ13-1 and LJ13-2 of letter FW543.

**Response to Comment LJ13-24**

It is true that in most cases potential TOD benefits identified in the Draft EIS may not occur for many years, if at all, because many factors shape the market for TOD. The economic analysis thus focuses on quantifying direct impacts (both positive and negative) from construction and the

**Page 5 (continued)**

displacement of businesses in the FLWE corridor. There would also be sales tax revenue from construction to partially offset this impact.

***Response to Comment LJ13-25***

Section 4.3.4.2 of the Draft EIS notes the potential loss of B&O tax revenue to jurisdictions in the event that displaced businesses choose to relocate outside of their current jurisdiction.

***Response to Comment LJ13-26***

An elevated light rail guideway along SR 99 would not divide or create barriers between the neighborhood and the rest of the city any more than SR 99 does. The guideway would also be of a similar height as buildings allowed under current zoning along SR 99 in Pacific Ridge, and as some recently constructed buildings. While the options running parallel to SR 99 could limit development potential of these properties, locating the light rail in the median is not expected to affect long-term development potential of these properties.

***Response to Comment LJ13-27***

The elevated guideway would not worsen the existing access problems caused by SR 99 since it would maintain access across the highway. In the Midway area, the Kent/Des Moines Station could provide TOD opportunities, with the station area becoming a meeting place and enhancing cohesion. Section 4.2, Land Use, provides information on TOD. The station would be consistent with the Envision Midway document.

***Response to Comment LJ13-28***

Text has been revised.

***Response to Comment LJ13-29***

Information on the Des Moines Police Department substation at Redondo Square has been added to the section.

***Response to Comment LJ13-30***

Sound Transit has coordinated with the affected jurisdictions throughout the project through regular briefings and meetings, as well as through the Interagency Working Group. While general mitigation measures can be identified during conceptual and preliminary design, site-specific measures are often not agreed to with local jurisdictions until the permitting and final design process. Each jurisdiction has had and will continue to have opportunities to provide input throughout the project development process.

			General	Whenever the term "extent feasible" is used in mitigation discussion, it may be more appropriate to use "maximum extent feasible" since this term is utilized to discuss property, business, infrastructure needs such as access.	Des Moines	Andrew Merges
			General	While extensive detours are presented that would place a new burden on local agency infrastructure, the associated mitigation discussion or narratives do not discuss vehicular/multimodal capacities or structural capacity of the facilities to handle the loading. For example, it would be expected that local facilities would experience a reduced service life, and that should be accounted for in mitigation.	Des Moines	Andrew Merges
Construction Impacts	5.1.3.1	5-5		Note here and elsewhere that SR 99 would delay future SR 99 economic redevelopment for 5-7 years during the construction period.	Des Moines	Grant Fredricks
Construction Impacts	5.2.1.1	5-12		Construction on an SR 99 alignment would have significant impact on auto-dependent businesses for 5-7 years	Des Moines	Grant Fredricks
Nonmotorized Facilities	5.2.1.1	5-12		Detours on SR 99 to accommodate construction will other N-S arterials in Des Moines including 24th, 16th and Marine View Drive. These impacts should be further evaluated in the FEIS if SR 99 is selected as the Preferred Alternative.	Des Moines	Grant Fredricks
Land Use	5.2.1.6	5-28 thru 30		It has been noted that pedestrian and bike facilities would be detoured and it is noted that there are current infrastructure limitations where detours may not be viable. How about building temporary facilities?	Des Moines	Andrew Merges
Economics	5.2.3	5-32 thru 36		There is an assumption that parcels fully/partially impacted by construction would rebound with redevelopment post construction. What data demonstrates this?	Des Moines	Andrew Merges
	5.2.4.2	5-36 thru 37		Can negative impacts especially loss of business activity be quantified, similar to the positive economic discussion? One would assume there may be rough correlation between this project and those already constructed?	Des Moines	Andrew Merges
6.0 Cumulative Impacts	6.1		Exhibit 6-1	24th Ave S should be shown as connecting from 216th to 208th.	Des Moines	Grant Fredricks
Social Impacts, Community Facilities, Neighborhoods	7.6	7-19	Table 7-2	The general statement under Social, Neighborhoods, Community impact, seems to be referring to the new SeaMar health clinic, currently under construction. If so, an alternative SR 99 alignment will be required to avoid the need to relocate the new facility.	Des Moines	Grant Fredricks
Project Benefits	7.6.3	7-27		The new SeaMar health clinic, is currently under construction. An alternative SR 99 alignment will be required to avoid the need to relocate the new facility.	Des Moines	Grant Fredricks
8.0 Alternatives Evaluation						
Areas of Controversy and Issues to be Resolved	8.4	8-11		With regards Potential Additional Stations, the discussion should also more clearly describe the decision of using any extra voter approved or federal funds to do what voters approved (i.e., extend to S. 272nd) or what the City of Federal Way badly wants (extend to Federal Way) or the long sought goal of extending to Tacoma versus investing in non-voter approved stations at 216th and/or 260th	Des Moines	Grant Fredricks
Technical Appendices	Economics D4.3	LJ13-42	Table 4.3-1	The 260th East shows +1 full parcel acquisitions in Des Moines on Table 4.3-	Des Moines	Grant Fredricks
	Economics D4.3	D4.3-3	Table 4.3-2	1 but no Des Moines property tax impact on Table 4.3-2.	Des Moines	
	Economics D4.3	LJ13-43	Table 4.3-3	Isn't the Kings Arms Motel to be acquired for a SR 99 East Option?	Des Moines	Grant Fredricks
	Economics D4.3	D4.3-4	Table 4.3-3	The +1.4% Des Moines Commercial property land to be acquired doesn't seem consistent with other Appendix D tables.	Des Moines	Grant Fredricks
	D4.3	D4.3-6	Table 4.3-3	The 0.0% Des Moines Commercial property land to be acquired for the I-5 to SR 99 Alternative doesn't seem consistent with # of parcels.	Des Moines	Grant Fredricks

**Response to Comment LJ13-31**

See response to LJ13-30.

**Response to Comment LJ13-32**

Potential traffic impacts from detours for the Preferred Alternative has been added to the Final EIS in Chapter 5, Construction Impacts, and Appendix G1, Transportation Technical Report. The structural capacity of these routes is not in question because all proposed detour routes are classified as major arterials or above, and detours are only expected in off-peak hours when traffic volumes would be lower.

**Response to Comment LJ13-33**

Text addressing this issue has been added to Section 5.2.4 under Potential Negative Economic Impacts from Construction.

**Response to Comment LJ13-34**

These potential impacts were not assessed further in the Final EIS because the SR 99 Alternative was not identified as the Preferred Alternative.

**Response to Comment LJ13-35**

As described in Section 5.7, Non-motorized Facilities, of Appendix G1, Transportation Technical Report, protected sidewalks would be temporarily provided in some locations.

**Response to Comment LJ13-36**

Please see the indirect impact discussion in Section 4.2, Land Use, which describes potential future TOD development near station areas. Sound Transit would likely surplus and sell some properties after construction for redevelopment, as dictated by market demand. Sound Transit's TOD program has successfully facilitated redevelopment of surplus properties along the existing light rail facility. Sound Transit has programs to help businesses that remain open during construction, and works to maintain

**Page 6 (continued)**

access as much as possible. It has successfully implemented this approach on similar projects.

***Response to Comment LJ13-37***

Sound Transit has not attempted to forecast and quantify the aggregate business losses due to construction-related impacts since each business has unique needs with regard to access, parking, and competition from nearby businesses. The analysis is detailed enough to allow the public and decision-makers to compare the relative extent of the impacts among the alternatives.

***Response to Comment LJ13-38***

In the Final EIS, Exhibit 6-1 shows 24th Avenue S connecting between S 208th Street and S 216th Street.

***Response to Comment LJ13-39***

Please see response to Common Comment 9.

***Response to Comment LJ13-40***

This facility would only be impacted by the SR 99 Kent/Des Moines HC Campus Station Option or the S 260th West Station Option. If one of these options were selected as part of the project to be built, Sound Transit would evaluate ways to avoid impacting it.

***Response to Comment LJ13-41***

Please see response to comment LJ13-1 in this letter.

***Response to Comment LJ13-42***

This is an error and has been corrected in the Final EIS. There is no net change in full parcel acquisitions in Des Moines with regard to the S 260th East Station Option compared to the I-5 to SR 99 Alternative or the SR 99 Alternative.

***Response to Comment LJ13-43***

The King's Arms Motel would be acquired for the Kent/Des Moines SR 99 East Station Option associated with the I-5 Alternative in the Draft EIS. Note that this option is now part of the Preferred Alternative shown in these tables for the Final EIS.

***Response to Comment LJ13-44***

Table D4.3-3 shows that the S 216th East Station Option would acquire 1.4 percent more commercial land than the SR 99 Alternative and SR 99 to I-5 Alternative. See also Table D4.3-1. This additional property acquisition would cause more property tax impacts than the alternatives, as shown in Table D4.3-2.

It should be noted that Table D4.3-3 reports acquisitions in terms of total commercially zoned land acres in each city. Acquiring different properties with different acreages would naturally have different impacts on the city's commercial land base.

***Response to Comment LJ13-45***

This alternative would acquire only one commercial property in Des Moines. This would be less than 0.5 percent of the total commercially zoned land in the city. A note to Table 4.3-2 explains that "0.0% means <0.5%."



No Comments

May 14, 2015

Dow Constantine  
Chair, Sound Transit Board  
401 S. Jackson St  
Seattle, WA 98104-2826

Dear Chair Constantine:

The City of Des Moines is writing the Sound Transit Board to forward City Council Resolution No. 1297 adopted by the Des Moines City Council on May 7, 2015. The City will also be submitting Federal Way Link Extension (FWLE) DEIS formal review comments by separate letter.

Resolution No. 1297 recommends a Preferred FWLE Alignment along SR 509 and I-5, with a Kent/Des Moines Station somewhere between the west side of 30<sup>th</sup> Avenue South and the east side of SR 99, with pedestrian access from the Station to Highline College by an elevated pedestrian/bicycle bridge from east of SR 99 to the College.

We also propose that Sound Transit, Highline College and the cities enter into a formal agreement committing to joint planning, design, construction and operations once a Preferred Alternative is identified by the Sound Transit Board to ensure that:

- a. disruptions to property owners, businesses and residents are minimized,
- b. the highest levels of urban land use and design are achieved,
- c. transit oriented development is maximized,
- d. impacts to existing commercial businesses and future commercial development are minimized, and
- e. Highline College current operations, its students and future development, including pedestrian, transit and vehicular access, are not diminished but enhanced to the extent possible.

Very truly yours,

Dave Kaplan  
Des Moines Mayor

Cc: Des Moines City Council  
Tony Piasecki, Des Moines City Manager

*No Comments*

## RESOLUTION NO. 1297

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF DES MOINES, WASHINGTON, to the Sound Transit Board recommending a Preferred Alignment and Kent-Des Moines Station location for the Federal Way Link Extension (FWLE), and expressing the Council's intent for City staff and City Council to work cooperatively with Sound Transit, the City of Kent, Highline College and other cities (Agencies) along the FWLE corridor to coordinate transportation and land use planning and development efforts to realize the best possible outcomes for all affected parties.

WHEREAS, in 2008 voters authorized Sound Transit to proceed with the expansion of their Link Light Rail System to include service from the South 200<sup>th</sup> Street Station in SeaTac to South 272<sup>nd</sup> Street under the Sound Transit 2 Plan, and

WHEREAS, the FWLE project crosses the boundaries of SeaTac, Des Moines, Kent and Federal Way and the City of Des Moines seeks to work cooperatively with Highline College to support the College, its students and operations, to minimize disruptions to property owners, businesses and residents, minimize adverse aesthetic, economic and environmental impacts, and provide safe vehicular and pedestrian access, utilities and aesthetic improvements along the corridor and within the station areas to support these goals, and

WHEREAS, the Cities of Des Moines and Kent (Cities) and Highline College anticipate significant transit oriented development in the Midway area as a result of the Sound Transit FLWE Kent-Des Moines Station that will significantly affect each City's land use, zoning, transportation system, residents, businesses, and Highline College, and

WHEREAS, the City of Des Moines expresses its intent to continue to work cooperatively to provide for development in a way to meet the operational and development needs and timetables of each Agency, and proposes to enter into more formal agreements for planning, design, construction and project mitigation, and

WHEREAS, City of Des Moines proposes that the Agencies agree to jointly pursue grant opportunities through State and Federal sources and supplemental funding sources, now therefore,

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THE CITY COUNCIL OF THE CITY OF DES MOINES RESOLVES AS FOLLOWS:

Sec. 1. That the City of Des Moines, having evaluated the environmental impacts associated with each of the alignment alternatives and station options in the FWLE Draft Environmental Impact Statement (DEIS), recommends that the Sound Transit Board identify SR 509/I-5 as the Preferred Alternative Alignment to Federal Way with the Kent-Des Moines Station between 30<sup>th</sup> Avenue and SR 99 and returning to an I-5 alignment east of Lowe's, with the following additional recommendations that:

(1) The alignment be designed to minimize impacts to commercial and residential properties and maximize future development to the extent possible;

(2) The guideway alignment serve as an integrating urban design feature to the extent possible, not a structure that creates a visual or functional barrier to either Midway or to Highline College;

(3) The Kent-Des Moines Station be designed to enhance the development potential of Midway and properties fronting on Pacific Highway South (State Route 99);

(4) 236<sup>th</sup> Lane, both east and west of SR 99, be designed and fully developed to serve as a gateway to Highline College, the Kent-Des Moines Station depending on its location, and to Kent's Midway transit-oriented development area;

(5) Primary pedestrian access from the Kent-Des Moines Station to Highline College be by an elevated pedestrian/bicycle bridge from the Station across SR 99 to the College to make access as safe and convenient as possible, and to minimize vehicular and transit traffic impacts on SR 99;

(6) Direct public transportation transit access to the College campus not be compromised; and

(7) Traffic circulation at the I-5/Kent Des Moines (KDM) Road interchange and intersections at SR 99/KDM, 236<sup>th</sup> Lane/SR 99 and 240<sup>th</sup>/SR 99 be designed or mitigated in ways to maintain traffic capacity in both Kent and Des Moines and along Kent Des

*No Comments*

No Comments

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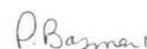
Moines Road, SR 99, South 240<sup>th</sup> Street, and other impacted transportation corridors.

**Sec. 2.** That the City of Des Moines, proposes to Sound Transit, the City of Kent and Highline College, that the four agencies (and perhaps other agencies) enter into a formal agreement committing to joint planning, design, construction and operations once a Preferred Alternative is identified by the Sound Transit Board to address mutual and respective goals and to ensure (a) the highest levels of urban land use and design are achieved, (b) transit oriented development is maximized, (c) impacts to existing commercial businesses and future commercial development are minimized, and (d) Highline College current operations and future development, including pedestrian, transit and vehicular access, are enhanced to the extent possible.

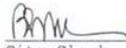
**ADOPTED BY** the City Council of the City of Des Moines, Washington this 7th day of May, 2015 and signed in authentication thereof this 7th day of May, 2015.

  
MAYOR

APPROVED AS TO FORM:

  
City Attorney

ATTEST:

  
City Clerk

I, Bonnie Wilkins, City Clerk, do hereby certify that the foregoing is a true and correct copy of the original instrument on file and of record in my office in Des Moines, Washington 98198  


# Letter FW616

City of Des Moines

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June 2, 2015

Dow Constantine  
Chair, Sound Transit Board  
401 S. Jackson St  
Seattle, WA 98104-2826

Dear Chair Constantine:

The City of Des Moines is writing to supplement its input in my May 14th letter to the Sound Transit Board, the City's May 26th FWLE DEIS comments, and in response to other stakeholders comments that Sound Transit's Environmental Justice and Social Equity goals would be better served by an SR 99 alignment and a Kent/Des Moines station west of SR 99 or on the Highline College Campus.

As I wrote the Board on May 14th, Des Moines City Council Resolution No. 1297 recommends a Preferred FWLE Alignment along SR 509 and I-5, with a Kent/Des Moines Station somewhere between the west side of 30<sup>th</sup> Avenue South and the east side of SR 99, with pedestrian access from the Station to Highline College by an elevated pedestrian/bicycle bridge, from east of SR 99 to the College.

This policy position is consistent with the City of Kent's preferred alignment and station location on the west side of 30th Ave at about 236th, and of the policy positions of the cities of SeaTac and Federal Way.

LJ18-1

This position is also fully supported by the FWLE DEIS Environmental Justice analysis (Chapter 7) which concludes that minority and low-income populations have almost identical access to a 30th Avenue West, SR 99 East or SR 99 West station location (Table 7-3) and benefits to these populations.

It is true that a station west of SR 99 would be marginally more convenient to Highline College students and faculty, but only by less than 300 feet. This would be negligible if the elevated covered pedestrian and bicycle overpass, recommended by both Kent and Des Moines, is included.

LJ18-2

Referenced more generally in Chapter 7 is the negative impact that an SR 99 alignment would have on community resources such as the SeaMar Health Clinic and businesses (many of which are minority-owned) on SR 99 that provide services to minority and low-income populations. Those impacts include: reduced driveway access to business during the 1 to 4 year construction period; SR 99 lane closures; lost permanent parking; competition for remaining parking by non-business users; permanent reduction in property values; more noise and vibration impacts; some displacements from the business catchment area; and SR 99 transit travel-time delays.

LJ18-3

Our earlier comment letters challenged the assumption that funds might be available for additional stations at 216th and 260<sup>th</sup> because of the pressure to honor the expressed will of the voters in approving extension to S. 272<sup>nd</sup>, the interests of South King County cities to complete the FWLE to Federal Way as quickly as possible, and eventual extension to Tacoma, Lakewood, JBLM and DuPont.

## Response to Comment LJ18-1

Please see response to comment LJ6-1 in letter FW290.

## Response to Comment LJ18-2

Please see responses to Common Comments 2 and 9 in Table 9-6 of Chapter 9 of the Final EIS.

## Response to Comment LJ18-3

Please see response to comment LJ13-1 in letter FW543.

Dow Constantine  
June 2, 2015  
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LJ18-4 [As we have learned in Des Moines all too painfully over the past 15 years, transit oriented development is still probably decades out because of market factors beyond government control. What is well documented in the FWLE DEIS is a 26 minute reduction in transit travel time between Federal Way and Sea-Tac Airport, and that "transit service improvements are generally more important to these (minority and low-income) populations than to other members of the population" (p. 7-32). This is accomplished by providing more reliable and improved travel times to the large regional employment centers in Federal Way, Sea-Tac, Seattle, Bellevue, Redmond, Lynnwood, the University of Washington and eventually Everett. The Sound Transit Board is almost obligated to use any available funds to continue FWLE south as quickly as possible for the certain benefits noted, in lieu of opting for *potential* TOD benefits subject to uncertain funding and market conditions, but with certain costs to business and local governments.

LJ18-5 [Mentioned elsewhere in the DEIS, but not highlighted in Chapter 7, is the social justice commitment by the cities on the corridor to provide municipal services to these at-risk populations. In Des Moines, these services to the Pacific Ridge and South Des Moines neighborhoods along the SR 99 corridor are substantially impacted by SR 99 businesses through their sales, B&O and property taxes. An SR 99 alignment would most certainly reduce those revenues for at least a decade, with a disproportionately high and adverse effect on minority and low-income populations.

LJ18-6 [Finally, I want to underscore the need to balance all stakeholder interests. Kent has done a wonderful job (over many years) in creating the Kent Midway Sub-Area Plan. This plan was developed with input from affected stakeholders, including Highline College and Des Moines, and contains strong urban design. It is a plan that must be fully supported by the Board. The Kent/Des Moines station will be a gateway to both the College and to Midway, and *both* must be integrated and honored by the Board's preferred alternative decision. The Board must also honor the land use plans, and take into full consideration the economic impacts on the affected cities and their businesses.

LJ18-7 [The City of Des Moines and its elected leaders remain fully committed to continue to work with Sound Transit staff and the Board to refine a preferred alternative that meets the needs of all affected agencies and the public we serve.

Very truly yours,



Dave Kaplan, Des Moines Mayor

- Cc: Des Moines City Council
- Suzette Cooke, Kent Mayor
- Dana Ralph, Kent City Council President
- Jim Ferrell, Federal Way Mayor
- Jeanne Burbidge, Federal Way Deputy Mayor
- Mia Gregerson, SeaTac Mayor
- Tony Piasecki, Des Moines City Manager
- Cathal Ridge, Sound Transit
- FWLE IWG Contacts - Kent, Federal Way, SeaTac & Highline College

**Response to Comment LJ18-4**

Please see responses to Common Comments 6 and 10.

**Response to Comment LJ18-5**

Your comments regarding the SR 99 Alternative and business impacts and potential impacts on minority and low-income populations have been noted. Please see response to Common Comment 1.

**Response to Comment LJ18-6**

Please see response to Common Comment 5 discussing the stakeholder workshops for the Kent/Des Moines station area which led to the decision to locate the station on the west side of 30th Avenue S.

**Response to Comment LJ18-7**

Sound Transit appreciates the ongoing coordination that Des Moines has provided throughout the FWLE development process.

## Letter FW189

City of Des Moines

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*No Comments*

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1 explicit effort to improve this history by creating as  
2 much potential for a sustainable, community-accessible,  
3 mixed development as possible.

4 Four, public safety as well as perceived  
5 safety is another important argument for State Route 99  
6 Alignment. More ridership in well-traveled areas is  
7 safer. Keeping the stops in visible, busy destinations  
8 along Pacific Highway reduces the potential for riders  
9 to be targets for crime or to feel that they are.

10 This regional development project is a unique  
11 opportunity to simultaneously address many challenges  
12 facing Southwest King County in a positive manner. We  
13 have the chance to create a model of how suburban  
14 transit can permanently transform a diverse community  
15 that has been historically disadvantaged in terms of  
16 housing, education, jobs, and local transportation.

17 To ignore the local neighborhoods in favor of  
18 building yet another way for development to literally  
19 pass us by, would be a shortsighted and costly mistake.  
20 Signed. Thank you.

21 MS. STRAUSS-CLARK: Next up is Dave Kaplan,  
22 followed by Trey Taylor, followed by Dwight Hyland.

23 Please state your name and spell your last  
24 name.

25 MR. KAPLAN: Dave Kaplan, K-a-p-l-a-n. I'm

1 the Mayor and Councilmember in the City of Des Moines.  
 2 And I'm pleased to see the turnout here tonight, in  
 3 helping to choose an alternative for the Sound Transit  
 4 Federal Way Light Rail Extension.

5 It's appropriate to hold a meeting here at  
 6 Highline because of the number of students that are  
 7 here. It's a destination, and we're all proud of it and  
 8 delighted to see that it's growing and prospering. The  
 9 presence of a potential station located in proximity of  
 10 the college speaks to the need for light rail access for  
 11 students, staff, and residents.

12 The challenge that we face as a city council  
 13 making recommendations to the Sound Transit Board is to  
 14 identify an alignment that meets the needs of the  
 15 College and all of the 30,000 residents in the city. We  
 16 work diligently as a city in cooperation with our  
 17 neighboring cities to get ahead of the curve, to be in a  
 18 position to make recommendations on a proactive basis  
 19 rather than having a decision being made that happens to  
 20 us -- as happened in Tukwila a few years ago.

21 Some of the important considerations must be  
 22 to support an alignment that best serves the  
 23 transportation needs of our residents, that creates the  
 24 least disruption for existing residents and businesses,  
 25 that offers the best opportunities for economic

**Response to Comment LJ3-1**

Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS.

**Response to Comment LJ3-2**

Sound Transit has worked closely with all affected cities throughout development of the FWLE and has considered their concerns in identifying the Preferred Alternative. Chapter 8, Alternatives Evaluation, of the Final EIS describes the trade-offs between alternatives and options.

1 development and does not result in a net loss for the  
2 city, that takes into consideration the costs involved  
3 in constructing and locating a facility, that serves the  
4 needs of the College, and that provides the best  
5 opportunities for mitigation and environmental impacts.

6 As you can see, these are complex challenges.  
7 And we are encouraged by the input we've received from  
8 the community. And we intend to address all of those  
9 issues. The city council establishes recommendations  
10 for preferred alignment in concert with our neighboring  
11 cities. And our council is taking that up at our  
12 council meeting this evening at 7:30. So thank you.

13 MS. STRAUZ-CLARK: Up next is Trey Taylor,  
14 followed by Dwight Hyland, followed by Robert Thorpe.

15 Is Trey here?

16 MR. TAYLOR: Are you sure it's not Joey  
17 Taylor?

18 MS. STRAUZ-CLARK: I'm sorry. You're right.  
19 It might be Joey Taylor. I apologize. Okay.

20 You're up, Joey Taylor. Please state your  
21 name and spell your last name.

22 MR. TAYLOR: John Joey Taylor, T-a-y-l-o-r.  
23 And I'm a student here at Highline. I'm also -- along  
24 like the lines of what the proposals are for the light  
25 rail. I was also living in Tukwila during the