

Letter FW306

Federal Way Public Schools

Page 1

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Federal Way, WA
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www.fwps.org



Attn: Federal Way Link Extension Draft EIS Comments
Sound Transit
401 South Jackson Street
Seattle, Washington 98104

RE: Position and Potential Impacts on Federal Way Public Schools Facilities

To Whom It May Concern:

I am the Interim Superintendent of Federal Way Public Schools ("FWPS" or "District"). I write on behalf of the Board of Directors and FWPS, in order to provide Sound Transit with the District's input regarding design proposals and alternatives identified in the Draft Environmental Impact Statement ("DEIS") for the Federal Way Link Extension ("FWLE"). The Federal Way School Board of Directors on May 12, 2015 has officially supported the following station and route options identified in the DEIS:

- 1) The Federal Way Public School Board of Directors expresses its preference for an I-5 alignment as identified in the DEIS.
- 2) Given that over 500 students attend Highline College through the Running Start program, and other partnership programs, The Federal Way Public School's Board of Directors expresses its preferences for a station location in close proximity to Highline College (east of Highway 99).
- 3) The Federal Way Public School's Board of Director's supports the S 320th Park-and-Ride Station.

The District is supportive of Sound Transit's efforts to improve the availability and efficiency of transportation options within the District and the region. At the same time, the District wishes to ensure that any impacts to FWPS facilities are minimized, adequately mitigated, and do not impose long-term limitations or impacts upon the District's ability to operate and improve outstanding public schools. Detailed comments follow.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sally D. McLean'.

Sally D. McLean
Interim Superintendent

A handwritten signature in black ink, appearing to read 'Geoffrey McAnally'.

Geoffrey McAnally
Board President

Response to Comment LJ7-1

Your preference for an I-5 alignment with close proximity to Highline College and a S 320th Park-and-Ride Station has been noted. All FWLE alternatives would provide access to Highline College with the Kent/Des Moines Station. Please see response to Common Comment 4 in Table 9-6 of Chapter 9 of the Final EIS. The Board considered a variety of factors when it identified the Preferred Alternative, including public and stakeholder input, projected ridership, cost, and environmental impacts. The Federal Way Transit Center Station is part of the Preferred Alternative. Chapter 8, Alternatives Evaluation, includes a comparison of alternatives and shows the trade-offs between alternatives.

Response to Comment LJ7-2

Your support for the FWLE and concern regarding impacts on Federal Way Public Schools facilities has been noted. The Preferred Alternative has been designed to minimize impacts on FWPS facilities. Details about proposed mitigation for unavoidable impacts from the Preferred Alternative are provided in Appendix H.

The District has reviewed the DEIS, and has identified at least three FWPS facilities that may be significantly impacted by construction and operation of the Extension. The “I-5 Alternative” and the “SR 99 to I-5 Alternative” each propose a trench and lid under the Mark Twain Elementary School site. The “SR 99 Alternative” and “I-5 to SR99 Alternative” each anticipate construction of the FWLE very near the front of Federal Way High School, which is presently undergoing a \$106 million reconstruction. The District will detail its concerns regarding potential impacts to each of these sites in turn.

Mark Twain Elementary School

The Mark Twain Elementary School (“MTES”) campus is located at the southwest corner of the intersection of South 272nd Street and I-5—immediately across 272nd from Star Lake Park & Ride. The FWLE DEIS includes two alternatives that contemplate the Link Extension extending south from the Star Lake Park & Ride via underground trench and lid, under 272nd and continuing under a portion of the MTES campus. The District’s review of the DEIS reveals that this trench would be located beneath the MTES playfield and a portion of the school bus turnaround.

As to these impacts, the DEIS states:

The I-5 Alternative and SR 99 to I-5 Alternative would both have temporary construction impacts on the playfield at Mark Twain Elementary School, along I-5 at S 272nd Street. The alignment of these alternatives would cross under the athletic field, requiring □0.9 acre to be unavailable for school and public use during construction. The light rail would be constructed in a lidded trench at this location, and the playfield and bus loop would be closed for approximately 6 to 12 months during construction. Approximately 0.6 acre of the field could remain open during this construction period and would be available for school and public use. Buses are expected to be able to circulate elsewhere within the school parking lot. The playground adjacent to the playfield would not be affected. After construction of the light rail guideway, the playfield and bus loop would be restored to existing conditions, thereby allowing the continued use of the field, and school bus circulation.

DEIS 5-69 – 5-70. The DEIS goes on to note that, “If an alternative affecting Mark Twain Elementary School were advanced, additional coordination with Federal Way Public Schools would occur to make sure school buses could operate safely during construction.” DEIS 5-70.

The District agrees that, should the I-5 or SR-99 to I-5 alternative be chosen by Sound Transit, a great deal of coordination will be required in order to ensure continued safe and efficient operation of MTES during construction, beyond just ensuring that school buses could operate safely. However, Sound Transit should be aware that the District’s ongoing capital planning efforts have identified MTES for potential redevelopment within 10 to 15 years. If MTES undergoes redevelopment at the same time that FWLE construction is taking place, coordination of these efforts will be even more critical—and potentially complicated.

Response to Comment LJ7-3

Sound Transit has continued to coordinate with FWPS throughout development of the Final EIS and preliminary engineering of the Preferred Alternative, including the development of the S 272nd Elevated Star Lake Station Option. Since the Draft EIS, the Preferred Alternative alignment has shifted farther east to reduce the area needed for construction and reduce impacts on Mark Twain Elementary School. However, construction is expected to last longer than estimated in the Draft EIS. The shift reduced the acres of playfield unavailable for school and public use during construction to 0.3 acre for the Preferred Alternative. The S 272nd Elevated Star Lake Station Option would require 0.2 acre of the playfield during construction in addition to 0.1 acre permanently required for the guideway. Additional information regarding construction period impacts on the school is provided in Chapter 5, Construction Impacts, of the Final EIS. Sound Transit will continue to coordinate with the District during final design and construction to ensure the school can operate safely.

LJ7-4 On a related note, the District is concerned regarding any limitations on future use of the MTES site that might result from a trench and lid being constructed across the MTES site as contemplated in the I-5 and SR-99 to I-5 alternatives. In the District's review, the DEIS does not appear to address this issue. If placement of the trench and lid across the MTES site will constrain the District's future use of that site, redevelopment in order to meet future needs will likely be significantly more expensive, if not infeasible. Any such impacts should be identified and detailed and need to be considered in determining the FWLE's route.

Federal Way High School

The Federal Way High School ("FWHS") campus is located adjacent to and just west of SR-99, south of South 304th Street. FWHS is undergoing a complete reconstruction, replacing the old, sprawling collection of buildings with a modern, three-story building. Portions of the new building will be located closer to SR-99 than the previous building.¹

LJ7-5 As the DEIS notes, the FWLE would be elevated at FWHS. The new building's location closer to SR-99 and new multi-story configuration raise concerns regarding vibration, noise and visual distractions that may impact FWPS students and staff both during construction and in operation of the FWLE.

The DEIS includes specific consideration of vibration impacts on the FWHS Performing Arts Center, and concludes that such vibration impacts can be adequately mitigated. DEIS 4.7-2 and 4.7-6 to 7. The DEIS does not include specific discussion of vibration effects on other FWHS operations. The District is concerned that any and all such impacts be fully mitigated.

The DEIS also recognizes potential noise impacts on FWHS:

There would be a noise impact at the easternmost part of the Federal Way High School, with operational noise levels just meeting the FTA impact criteria. In addition, exterior noise levels at the new Federal Way High School Performing Arts Center would result in an impact. It is important to note that the noise impact predicted for Federal Way High School is an exterior noise impact. The typical mitigation measures used by Sound Transit are to first mitigate at the source, which would include installing sound walls between the light rail and the school. As a new building under construction adjacent to SR 99, the building may have sufficient exterior to interior noise reduction. Based on a review of the building design, the interior noise levels at all noise-sensitive parts of the school are estimated to be 35 to 45 dB (or more) lower than the exterior noise levels, and therefore no interior noise impacts are expected. If this alternative is advanced, additional acoustical testing may be performed when construction is complete to determine the exterior-to-interior noise reduction and verify that noise levels in classrooms, the performing arts area, and other noise-sensitive parts of the building are within the applicable standards.

DEIS 4.7-13. The District appreciates Sound Transit's consideration of these potential impacts

Further information regarding the FWHS reconstruction project is available via the District's web site (<http://www.fwps.org/highlights/constructionupdates>) or by contacting me directly.

Response to Comment LJ7-4

Sound Transit shifted the Preferred Alternative alignment east to reduce temporary and long-term impacts on this property. Although Sound Transit understands that there are no plans or designs for construction of new school facilities on the property at this time, it evaluated the potential to build a building over the trench if it was needed in the future. It assumed a two-story building based on coordination with District staff and recently constructed elementary schools in the district. As described in Section 4.14, Public Services, Safety, and Security, the lidded structure would support a two-story school building. Larger structures might require additional structural support in the trench. The S 272nd Star Lake Elevated Station Option would limit future development on this portion of the property.

Response to Comment LJ7-5

The new buildings for the Federal Way High School would be approximately 130 feet from the near track for the SR 99 Alternative. At this distance, vibration predictions were well below the FTA impact threshold for schools and would not impact operations except at the Federal Way High School Performing Arts Center, which is considered a special building with different impact criteria. Sound Transit would mitigate impacts at this facility.

Response to Comment LJ7-6

Section 4.7, Noise and Vibration, describes the noise and vibration impacts that would occur from the SR 99 Alternative and I-5 to SR 99 Alternative near the FWHS, and the mitigation that would address those impacts. If either of these alternatives were selected to be built, Sound Transit would work with the District during final design to confirm the mitigation design measures at FWHS are warranted and would be effective.

LJ7-6

on FWHS. As with vibration impacts, the District believes that it is critical that any noise impacts be fully mitigated so that District students and staff may remain fully engaged in the work of public education.

Finally, the DEIS includes general discussion of visual impacts. For example, it acknowledges that “the elevated guideway of the SR 99 Alternative would impact the greatest number of sensitive viewers (residents) of the four alternatives.” DEIS 4.5-1. The DEIS’s consideration of such impacts focuses primarily on residents and park users. However, the District is concerned that construction and operation of the FWLE in the SR-99 median immediately in front of the new FWHS—with some classrooms on the third floor of the new building—will serve as a visual distraction to students and staff. While the DEIS contemplates potential mitigation measures

LJ7-7

“particularly near residential areas,” DEIS 4.5-17, the District encourages Sound Transit to consider whether and how impacts on FWHS may similarly be mitigated. In addition, the DEIS notes that portions of the SR-99 corridor are experiencing redevelopment, and “visual quality is expected to improve as this development occurs.” DEIS 4.5-7. Accordingly, the District is also concerned that the aesthetic benefits of the design of the new FWHS may be reduced by virtue of this FWLE alignment. The District encourages Sound Transit to consider such potential impacts to this important new public facility in determining the FWLE alignment and mitigation measures.

Truman High School, and it's associated partners Boys & Girls Club and Head Start

This property currently serves preschool students and high school students, along with secondary students at the Boy & Girls Club outside of the school day. The property also is home to a Community Garden, sponsored by a local non-profit.

LJ7-8

DEIS x-xx – 5-x-xx. The DEIS goes on to note that, “If an alternative affecting the property and programs commonly referred to as Truman High school were advanced, additional coordination with Federal Way Public Schools, the Boys & Girls Club, Federal Way Community Gardens and Head Start will be required to ensure that programs and students can continue to be served during construction.

As with vibration impacts, the District believes that it is critical that any noise impacts be fully mitigated so that District students and staff may remain fully engaged in the work of public education.

Conclusion

Federal Way Public Schools appreciates Sound Transit’s consideration of the District’s input regarding the FWLE alignment, including thoughtful consideration of how Sound Transit can ensure that the District’s neighboring school sites are not detrimentally impacted by the FWLE. The District remains eager to work with Sound Transit towards that end. I would be happy to provide clarification or further detail regarding the District’s concerns expressed in this letter, and to explore route options and mitigation measures that will allow the District to support the FWLE without reservation.

/s/

Response to Comment LJ7-7

The visual quality impact assessment is focused on residential and park viewers (sensitive viewers) per the FHWA assessment methodology. The potential disruptive presence of elevated guideways and passing trains from the SR 99 and I-5 to SR 99 alternatives would be reduced by sound walls at this location.

Response to Comment LJ7-8

Section 4.7, Noise and Vibration, describes the noise and vibration impacts that would occur from the light rail and traffic accessing the Federal Way Transit Center station. No long-term noise or vibration impacts on programs or uses at Truman High School were identified.

Construction noise impacts at Truman High School would be minimal due to the distance from the construction site to the school. As described in Chapter 5, construction noise levels can be assumed to be 88 dBA Lmax at 50 feet, and the closest school building is approximately 435 feet away from the construction site. Construction noise would be about 69 dBA Lmax at the closest school building. The existing noise levels in the garden at the school were measured to be 61 dBA Leq with Lmax noise levels ranging from 62 to 72 dBA. Therefore, construction noise levels would be minimal.

Response to Comment LJ7-9

Sound Transit has continued to coordinate with FWPS throughout development of the Final EIS and preliminary engineering of the Preferred Alternative. Sound Transit will continue to coordinate with the District during final design and construction regarding potential impacts on all District facilities.

Letter FW315

City of SeaTac, Des Moines, Kent, and Federal Way Mayors

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May 20, 2015

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

Dear Chair Constantine:

We, the undersigned elected Mayors and City Council Presiding Officers, are writing the Sound Transit Board to recommend a Preferred Alignment along SR 509 and I-5, 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 support continuation of Metro's bus routes that access the College campus directly and encourage Sound Transit to work with Metro to assure that these routes maintain stops on the campus.

We share the goal of working cooperatively with each other and Sound Transit to support the operations and future development of Highline College and its students, minimize disruptions to property owners, businesses and residents, minimize adverse aesthetic, economic and environmental impacts, maximize transit oriented development in the Midway area, and provide safe vehicular and pedestrian access, utilities and aesthetic improvements along the corridor and within the station areas to support these goals.

Furthermore, we recommend that the alignment be designed to minimize impacts to commercial and residential properties and maximize future development to the extent possible; 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; the Kent-Des Moines Station be designed to enhance the development potential of Midway and properties fronting on Pacific Highway South (State Route 99); 236th Lane, both east and west of SR 99, be designed and fully developed to serve as a gateway to both the Kent-Des Moines Station and to Highline College; 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; and direct public transportation transit access to the College campus not be compromised.

Response to Comment LJ8-1

Please see responses to Common Comments 4 and 11 in Table 9-6 of Chapter 9 of the Final EIS.

Response to Comment LJ8-2

Sound Transit worked with King County Metro on developing a conceptual transit plan for each of the project stations, which is included in the Transportation Technical Report, Appendix G1 of the Final EIS. This plan assumes bus service will remain at the college.

Response to Comment LJ8-3

Sound Transit will continue to work with all affected cities in planning the FWLE project. The Final EIS describes measures to minimize impacts and potential mitigation for unavoidable impacts.

Response to Comment LJ8-4

Sound Transit will continue to work with the jurisdictions to identify measures that minimize impacts where feasible. This has included collaborative workshops held by Sound Transit and the relevant agencies to address many of the points raised in this comment. The Final EIS includes updated discussions of the potential for TOD around station areas in Section 4.2, Land Use; potential negative impacts from removing commercially zoned property from a city's developable land base in Section 4.3, Economics; visual impacts in Section 4.5, Visual and Aesthetic Resources; and property acquisitions and the associated relocation benefits/process in Section 4.1, Acquisitions, Displacements, and Relocations. Please see response to Common Comment 4 regarding a pedestrian bridge. Sound Transit has coordinated with King County Metro to maintain bus access at Highline College.

LJ8-5

We also propose that Sound Transit, Highline College and the cities continue to collaborate on 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.

Very truly yours,



Dave Kaplan, Des Moines Mayor



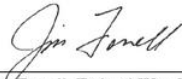
Suzette Cooke, Kent Mayor



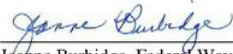
Dana Ralph, Kent Council President



Mia Gregerson, SeaTac Mayor



Jim Ferrell, Federal Way Mayor



Jeanne Burbidge, Federal Way
Deputy Mayor

Cc: Des Moines City Council
Tony Piasecki, Des Moines City Manager
SeaTac City Council
Todd Cutts, SeaTac City Manager
Kent City Council
Derek Matheson, Kent Chief Administrative Officer
Federal Way City Council
Brian Wilson, Federal Way Chief of Staff
King County Council
Highline College

Response to Comment LJ8-5

Sound Transit continues to coordinate with the cities and Highline College to achieve these goals. Please see Section 2.1 of Chapter 2, Alternatives, of the Final EIS, which describes the stakeholder process used to optimize the Preferred Alternative station locations.

Letter FW337

Midway Sewer District

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Commissioners

JACK W. HENDRICKSON
VINCE H. KOESTER
GEORGE LONDON
SCOTT SANBORN
JIM BAILEY



MIDWAY SEWER DISTRICT

PO Box 3487 • Kent WA 98089-0209 • 3030 S 240 St.

Manager

KEN J. KASE
(206) 824-4960
FAX NO.
(206) 878-2692

May 21, 2015

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

To Whom It May Concern:

Thank you for the opportunity to review the Federal Way Link Extension Draft EIS. This draft document considered a multitude of route options and the various impacts that you anticipated. I am not confident that this document fully considered the impact to the Midway Sewer District system of sewers. The following is a list of my comments:

1. **4.15.3 Affected Environment** – This section indicates that the only planned utility improvement identified was a minor expansion of the Puget Sound Energy substation at S. 221st St. This is not correct. The Midway Sewer District has extensive utility improvements planned within the ½ mile study area for utilities within the various FWLE alignments. The District's Comprehensive Sewer Plan identifies the Pacific Ridge area as needing extensive sewer improvements to accommodate the higher than original allowable (change in zoning) population density. Our Comprehensive plan identifies the need for a 2,100 foot long 24" diameter main, upsizing 1,600 feet of undersized main to 24" diameter, upsizing 1,000 feet of undersized main to 18" diameter, installing 2,000 feet of new 15" diameter sewer, replace 1,600 feet of 8" sewer with 12" sewer, Construct 600 feet of new 12" diameter sewer, a new "Regional" pump station, and approximately 4,200 feet of new 10" diameter force main. This draft document did not consider any of these planned improvements (see attached Pacific Ridge Exhibit A).
- 19-1
- 19-2
- 19-3
- There is another set of planned improvements to the sewer system to accommodate the extension of SR 509 within this utility study area. I could list all of these SR 509 planned improvements but I prefer if you review our SR 509 impact study to identify the sewer utility improvements (see attached study).
2. **5.2.16 Utilities - 5.2.16.1 - Construction Impacts** – this section indicates that utilities were divided into major and minor utilities. Major utilities were inventoried and minor utilities were not. Concerning sanitary sewers, major utilities were defined as force mains and gravity sewers 16" diameter or greater. Only 9.3% of the Midway Sewer District collection system is 16" diameter or greater. This indicates to me that over 90% of our sewer system was not inventoried. This inventory was conducted for possible effects on major utilities in the study area to identify potential conflicts and utilities that might require relocation for the project. Our system takes

Response to Comment LJ9-1

A summary of planned upgrades for the water and sewer districts, including the upgrades in the Pacific Ridge neighborhood, has been added to Section 4.15, Utilities, of the Final EIS.

Response to Comment LJ9-2

Thank you for providing the SR 509 Impact Study. Details on these improvements are not included because WSDOT is revisiting the design of the SR 509 Extension Project, which might alter the District's accommodations to it. However, a review of the impact study suggests that the FWLE would not preclude implementing any of the District's proposed SR 509-related improvements. If the FWLE Preferred Alternative were built prior to the SR 509 Extension, it would relocate the facilities on S 211th and S 212th Street that would otherwise be relocated for the SR 509 project.

Response to Comment LJ9-3

The definitions of "major" and "minor" utilities are broad categories used in the EIS, and the comparison of major utility conflicts is intended to allow a comparison of alternatives rather than provide a complete inventory of every conflict. The preliminary engineering plans for the Preferred Alternative document all utilities and potential conflicts. No pump stations would be required for the proposed sewer line relocations.

LJ9-3 advantage of topography to maximize gravity conveyance whenever possible. Some of our lines are less than 16" in diameter but are considered major utilities by us. Relocating sewers from the topographically advantageous (low lying) areas to areas that are convenient for Sound Transit could require deep excavations. This is especially true where "trench stations" intersect gravity sewers. The Midway Sewer District attempts to utilize gravity sewer service whenever possible. Pump stations are not considered a reasonable alternative to gravity sewer service because they are less reliable, require constant ongoing maintenance, require electrical energy to operate and diesel energy for emergency backup which greatly increases our carbon footprint. Pump stations also permanently increases the operating cost of our utility which would unfairly burden our customers.

3. **5.2.16.2 Potential Mitigation Measures** – This section indicates that Sound Transit would work with utility providers to minimize impacts. We have a history working with Sound Transit on other segments of this light rail system. It has been our experience that the District must bear any staff or engineering or consultant costs associated with locating utilities reviewing plans identifying conflicts and other matters related to the design and construction of light rail extensions through our service area. This can be a burden on a small utility such as the Midway Sewer District and ultimately the customers we serve. Perhaps it would be appropriate for Sound Transit to provide reimbursement for costs related to the technical aspects of our utility accommodating your project.

LJ9-5 Sound Transit's Federal Way Link Extension, when completed, will be a regional asset that will help alleviate the transportation problems in our area. Because it benefits our region the costs associated with this extension should be born equally and fairly amongst those in our region. It would not be fair to place an unbalanced financial burden on the population that live in the Midway Sewer District service area. By unbalanced financial burden I mean relocation of our facilities that require pump stations or additional maintenance or even staff and consultant expenses related to the planning, design, or construction of this regional asset. Thanks again for the opportunity to comment on the Federal Way Link Extension Draft EIS.

Sincerely,

Ken J. Kase, Manager

Attachments: Schematic of Pacific Ridge Sewer Improvements
SR 509 Impact Study

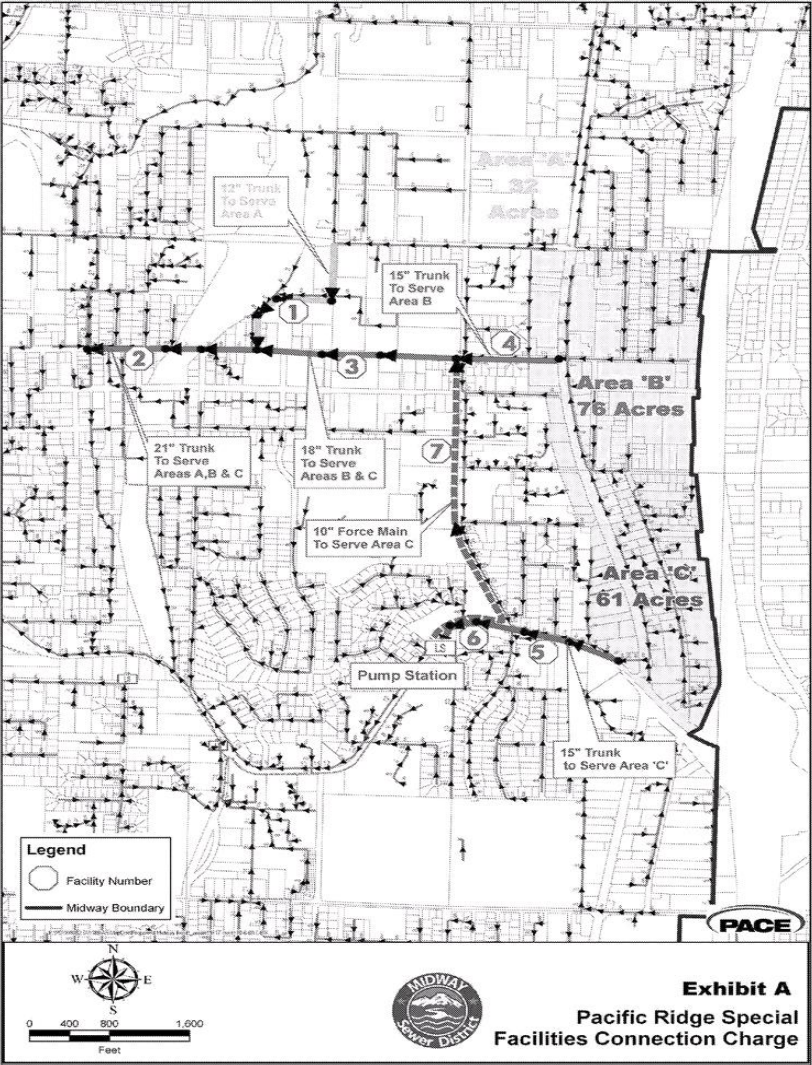
Response to Comment LJ9-4

Sound Transit will develop a utility relocation agreement with the District during final design, once the Sound Transit Board has selected an alternative to build. That agreement would address the concerns raised in this comment, such as defining which District activities may be compensated by Sound Transit.

Response to Comment LJ9-5

Sound Transit typically bears the cost of utility relocations unless otherwise addressed by franchise or other agreements with local jurisdictions, which would avoid undue burdens on taxpayers. Utility relocations for the FWLE would replace aging infrastructure with new infrastructure, extending the life of those utilities and potentially reducing maintenance of those specific facilities for a period of time. All new sewer infrastructure would have a significantly increased life span.

No Comments



No Comments

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MIDWAY SEWER DISTRICT

SR 509 IMPACT STUDY

October, 2004

Prepared by:



No Comments

**MIDWAY SEWER DISTRICT
SR 509 IMPACT STUDY****INTRODUCTION**

The Washington State Department of Transportation (WSDOT) is currently in the pre-design phase of a transportation improvement project identified as the SR 509/I-5 Freight and Congestion Relief Project. This project is an extension of the existing SR 509 from its current southernmost terminus at South 188th Way, through the City of SeaTac, to a new connection with Interstate 5 at approximately South 212th Street, and also includes merge lanes and congestion relief lanes along I-5 to the south. The proposed new extension of SR 509 traverses through the Midway Sewer District's service area. This study is an attempt to identify impacts to the Midway Sewer District's sewer system facilities that will occur as a result of construction of the SR509/I-5 Freight and Congestion Relief Project. Most of the issues discussed herein are associated with the SR 509 portion of the project, as the improvements to I-5 will have minimal impact on the District. Therefore, further references to highway or ROW are to be interpreted as being SR 509 unless specifically indicated otherwise.

GENERAL DISCUSSION

Much of the proposed SR 509 extension is to be constructed at or near existing grade. However, there are two areas where the roadway will be constructed on bridges above the existing ground and three areas of significant cuts where the new road will be constructed substantially below existing grade. These cut areas, by their very nature, will drastically impact Midway's gravity sewer collection system.

Also of concern to the District is having their sewer lines criss-crossing State highway right-of-way. This presents a problem in accessing facilities for operation and maintenance. The northern portion of the proposed highway approximately follows right-of-way long ago acquired by WSDOT for SR 509. However, south of about South 194th Street, the current proposed alignment of the highway crosses through public and private property intended to be acquired by WSDOT as right-of-way for the highway. The District has very few existing sewer lines within the existing SR 509 right-of-way, however, there are many lines in those areas proposed for ROW acquisition along the new alignment. Figure 1 shows the overall project with both the existing and proposed SR 509 rights-of-way.

As a result of the WSDOT project, utilities in the impact area, including Midway Sewer District, must analyze impacts and, if necessary, plan alternate arrangements for service. The agency responsible for the cost of construction of alternate facilities depends on the current location of the facilities that will be impacted. Those facilities that currently lie within public rights-of-way will be the utility's responsibility to relocate or provide alternate service for. This is typically stipulated in the utility franchise agreements. Relocation of those facilities that are currently located within easements on private property will be the responsibility of WSDOT. Minor nuances to these general rules of thumb are currently being negotiated between the District and WSDOT.

No Comments

IMPACT ANALYSIS

As a result of several coordination meetings between the District and WSDOT an impact analysis matrix has been developed by WSDOT staff that identifies all District sewer lines that will be affected by the SR 509 work. The matrix also identifies whether the impacted line is located within an easement or within public right-of-way. This study will utilize that matrix and expand on it by identifying alternate locations or methods of providing service to those areas that are impacted. The individual impact areas have been numbered in the matrix that is included as a part of this report. (Note that the colored portion of the matrix was developed by WSDOT. The rest of the matrix is that portion developed as a part of this study.) Those numbers correspond to those shown on the exhibit maps that are also attached to this report. The matrix identifies the location of each conflict by roadway stationing from the WSDOT design plans. We have shown the stationing on the map exhibits. Following are short descriptions of each conflict as identified in the matrix, and our recommendation for maintaining service to the affected area. Note that the proposed sewer improvements must be constructed prior to or in conjunction with the roadway work to insure that there are no interruptions in service.

Figures 2 through 6 are enlargements of certain areas of Figure 1. These figures show in detail the proposed improvements recommended to address the conflicts described in each section below.

Section 1

A portion of 32nd Ave. S., approximately between S. 211th St. and S. 212th St., will be removed as part of the SR 509 construction project. There is an existing sewer line in 32nd Ave. S. in this area that flows to the north. Approximately 850 lineal feet (LF) of line will be abandoned requiring that a new line be constructed to pick up the flow from the houses along 32nd Ave. S. that lie south of S. 212th St. The reroute will most likely run along the western boundary of the new SR 509 right-of-way to connect to the sewer in S. 211th St., a distance of about 650 feet. An alternate reroute could run about 320 feet west in S. 212th St., but this would leave three houses lying north of 212th and west of the highway without gravity service.

Section 2

Approximately 200 feet of sewer line in S. 211th St. will be abandoned to accommodate the highway project. This will not pose any problems as the properties being served by this sewer are also being acquired for SR 509 right-of-way.

Section 3

Approximately 440 feet of a backyard easement line will be abandoned as the properties it is serving are being taken as part of the highway right-of-way acquisition. A new line, approximately 650 feet in length, will be required to be routed to the north and west to pick up three homes remaining on the west side of the SR 509 right-of-way.

Section 4

A portion of the sewers in this area, which is in the southeast corner of the intersection of S. 208th Street and International Boulevard, will be removed by the WSDOT project, as the proposal is to construct the highway below existing grade along this corridor. The existing sewers in the area are currently in the process of being abandoned and the flows rerouted to the

Midway Sewer District
SR 509 Impact Study

west and north in conjunction with the City of Seatac's International Boulevard Phase 4 highway improvement project. This is a portion of project No. 5 in the Capital Facilities Plan in the District's 2004 Comprehensive Sewer System Plan.

Section 5

This area, identified in the WSDOT matrix as S. 200th, is actually supposed to be S. 208th. There is apparently going to be a retaining or noise wall constructed along the west side of I-5 in this location, where Midway has an existing sewer line crossing under I-5. The wall design must be coordinated with the District to insure that footings do not impact the existing sewer.

Section 6

A section of S. 208th St., between the new SR 509 ROW and I-5, will be improved and the road will dead-end at SR 509. Approximately five existing manholes currently in this section of 208th may have to have their rims adjusted to match the new street grade.

Section 7

Similar to Section 6 above, this section involves reconstruction of S. 204th St. Four to six manholes may require rim adjustments to match the new street grade.

Section 8

The existing sewer line that lies within S. 208th St., between International Boulevard and the eastern ROW of SR 509, will be abandoned or removed to accommodate the highway. This line serves quite a large area of multi-family development. To continue service to this area, a new line will have to be constructed northwesterly, along the north SR 509 ROW, to an existing sewer on the west side of International Boulevard. This line will also have to pick up the sewers that currently run southerly along the east side of International Boulevard. Total length of the new line will be approximately 1,100 feet.

Section 9

The 10-inch trunk that runs northerly along the east side of International Boulevard will be removed for the new highway. This trunk serves much of the area east of International Boulevard between S. 208th and S. 216th Streets, along with the area served by the line discussed in Section 8 above. The method proposed to reroute this flow is to pick up the trunk just north of S. 208th St. and run it northwesterly, along the south SR 509 ROW. This new line will run approximately 2,200 feet along the ROW, picking up flow from existing sewers to the south as necessary, and reconnect to the existing system at approximately S. 203rd St.

The WSDOT plans show two proposed detention ponds along the area where the sewer is shown to be rerouted. The ponds would be directly adjacent to the highway, in the area where the sewer is proposed to go, and may pose a conflict or design issues associated with the sewer. These issues can be better assessed as the WSDOT plans are further refined.

Sections 10 through 12

There are many sewer lines in this area that cross the new ROW and would present significant access and O&M issues if they were to remain. It is proposed to construct parallel mains along the north and south ROW lines to pick up flows from existing sewers on the north and south. The total length of rerouted sewer on the north is approximately 1,600 feet. The sewer on the

No Comments

No Comments

Midway Sewer District
SR 509 Impact Study

south would be part of the 2,200 feet discussed under Section 9. It should be noted that the potential for future service to the area just northeast of the intersection of S. 208th St. and 24th Ave. S. must be preserved as the existing sewers that currently would have provided that service will be removed to accommodate one of the detention ponds identified above. A 550-foot extension should be constructed outside the pond area to provide that future service.

Section 13

An existing sewer that crosses the ROW, at 24th Ave. S. extended, would be impacted by fill for the highway and, at a minimum, a manhole would have to be relocated. However, this line must also have the capacity to handle the rerouted flows that will occur as a result of the diversions constructed along the northern boundary of SR 509. It is proposed to construct a new crossing of sufficient capacity to carry all flows. The crossing will be in an area where the new highway will be constructed above grade on a bridge, causing minimal impact and allowing future access to the new sewer. The crossing length is approximately 550 feet. Again, the location for the new line is within a proposed detention pond and design efforts will have to be coordinated with further refinements of that facility, or, the new main may have to be rerouted entirely around the pond.

The manhole where this section of rerouted pipe connects to the existing system is identified as the beginning of Project No. 6, the South 203rd Street Trunk Line Improvements, in the District's 2000 Comprehensive Sewer System Plan. The Comp Plan indicates that this project consists of replacing approximately 350 lineal feet of existing 15-inch pipe with 21-inch pipe using trenchless technology. The District may want to complete this Comp Plan project at the time the reroute facilities are being constructed.

Section 14

This is an area where three major trunk lines, including the IWS line, cross the highway ROW in Des Moines Creek Park. The highway will be constructed on a bridge over this area and should not significantly impact the sewer lines. The location of the existing lines will have to be coordinated with the WSDOT design to insure that bridge footings are not constructed over or near the lines.

Section 15

This impact area is just north of Section 14, where the same three sewer lines cross S. 200th Street. Potential fill and improvements to S. 200th St. in this area could require adjustment of manholes to match grade. Any significant fill should be analyzed to determine if there would be detrimental impacts to the sewer lines. The amount of any potential fill is unknown at this time.

Section 16

Sewers on the west side of SR 509 will be isolated by the highway construction. The existing crossing at S. 194th St. is in an area to be filled by about 25 feet. It is proposed to reroute the sewers to the south, along the southwestern ROW line, to Des Moines Way, and then north in Des Moines Way to connect to the existing system at approximately S. 194th St. Current WSDOT plans are for SR 509 to be bridged across Des Moines Way. This should allow room for installation of the sewer under the overcrossing and access for District maintenance staff. The length of the reroute is approximately 1,900 feet, 1,400 feet of 8" pipe and 500 feet of 10".

*No Comments***Section 17**

This area was identified by WSDOT as one where the District was considering extension of sewers to the south in Des Moines Way. Sewers will have to be extended at least to the south side of SR 509 in any event to pick up the existing sewers on the west side of the highway as described in Section 16. Further extension to the south may occur in the future to serve the area in the vicinity of Maywood Elementary School.

Section 18

The line referenced in the WSDOT conflict matrix, which runs parallel to the west ROW of SR 509, has already been abandoned. Alternate service to the area has been provided and should not be impacted by SR 509 improvements.

Section 19

An existing sewer line crosses the SR 509 ROW at approximately S. 188th St. and serves the area in the most northwestern portion of the District. An SR 509 bridge is proposed to span this area and will therefore not significantly impact the existing sewer line. The bridge design will require coordination with the District to insure that footings do not impact the sewer line.

Section 20

The line identified, which continues east from the section mentioned in Section 19, lies within a proposed wetland mitigation area for the new highway. Coordination with the District will be required to make sure that there is no impact to the sewer and that access is maintained.

Section 21

There is an existing sewer line that runs north to south along the east side of the SR 509 ROW. A proposed detention pond will impact the line and cut off service from properties to the east. It is recommended that the line be relocated to the east side of the detention pond to maintain service. Approximate length of the relocated line is 700 feet.

Section 22

This section of existing sewer is directly to the west of Section 21, along the west SR 509 ROW. The line is currently within an easement, but it appears that SR 509 ROW acquisition will encompass a major part of it, some of which will be under new travel lanes. The line, approximately 500 feet, should be relocated outside the new ROW so that access can be maintained.

I-5 Improvements

There are some improvements to I-5 proposed as part of the SR 509/I-5 Freight and Congestion Relief Project. Specifically, southbound merge lanes being added to I-5 from the proposed SR 509 interchange will push the southbound off-ramp from I-5 to Kent-Des Moines Road and the southbound on-ramp to I-5 from Kent-Des Moines Road further to the west. These changes may impact existing District sewer lines. The WSDOT I-5 conflict matrix for Midway Sewer District is included at the end of the matrix for the SR 509 improvements. The two conflicts that appear to have an impact on District facilities are as follows:

Properties being taken for ROW for the southbound off-ramp to Kent-Des Moines Road currently have side sewers that flow to easement lines that run west to 30th Ave. S. These

No Comments

Midway Sewer District
SR 509 Impact Study

side sewers will have to be abandoned as necessary as structures are removed (see Figure 7).

It also appears that a short existing sewer line that runs north to south in 32nd Ave. S., to S. 236th St., may have to be abandoned due to new ROW taken for the southbound on-ramp to I-5. To maintain service to properties currently being served by the line to be abandoned, approximately 450 feet of replacement main will be required (see Figure 8).

DESIGN OF FACILITIES

An effort has been made to show, in a very general way, the most likely location where the sewer reroute facilities would be constructed. The alignments were chosen based on topographical information obtained from GIS databases. However, the design of SR 509 improvements, including roadways, on and off ramps, cuts and fills, storm drains, detention ponds, etc., will have a big impact on the actual layout of the sewers and the feasibility of the routes shown. The actual design of the sewer improvements will have to be carefully coordinated with the SR 509 design plans and WSDOT staff to make sure that the grades and slopes work and that facilities are placed in locations that are accessible to District staff for operation and maintenance purposes.

The size of sewer lines identified for the reroute facilities in this report are intended to be adequate to provide ultimate buildout service to the entire potential areas that they serve. However, the capacity of sewer lines is dependant on the slope on which they are installed. Therefore, the size of line required to serve any particular area cannot accurately be determined until the actual design of that line occurs. In no case has the size of a reroute line been chosen to be smaller than the upstream pipes that feed it, even though the slope and capacity may dictate that a smaller pipe would suffice. For this report, we have assumed that reroute pipes will be constructed at or near minimum slope in order to size the various facilities.

Since many of the sewer facilities being affected by construction of the SR 509 improvements are currently located within easements on private property, every effort should be made to also locate rerouted facilities within easements. This has been District standard policy in the past to avoid substantial relocation costs in utility franchise areas when roadway improvements are made. This will require in some cases that easements be acquired from private property owners for the installation of rerouted facilities. In those cases where District facilities are to be relocated from existing easements into WSDOT property or ROW, it is recommended that the District negotiate an agreement with WSDOT wherein any future relocations necessitated by WSDOT improvements be funded by WSDOT.

COST ESTIMATES

The cost estimates shown on the spreadsheet in this report are based on costs in the District's 2000 Comprehensive Sewer System Plan, with adjustments for inflation. Items such as surface restoration and depths of installation were also factored into the costs, although these costs will be difficult to calculate until the actual location and alignment of the facilities is determined during final design. It is also assumed that all of the existing pipe that is in conflict with the

No Comments



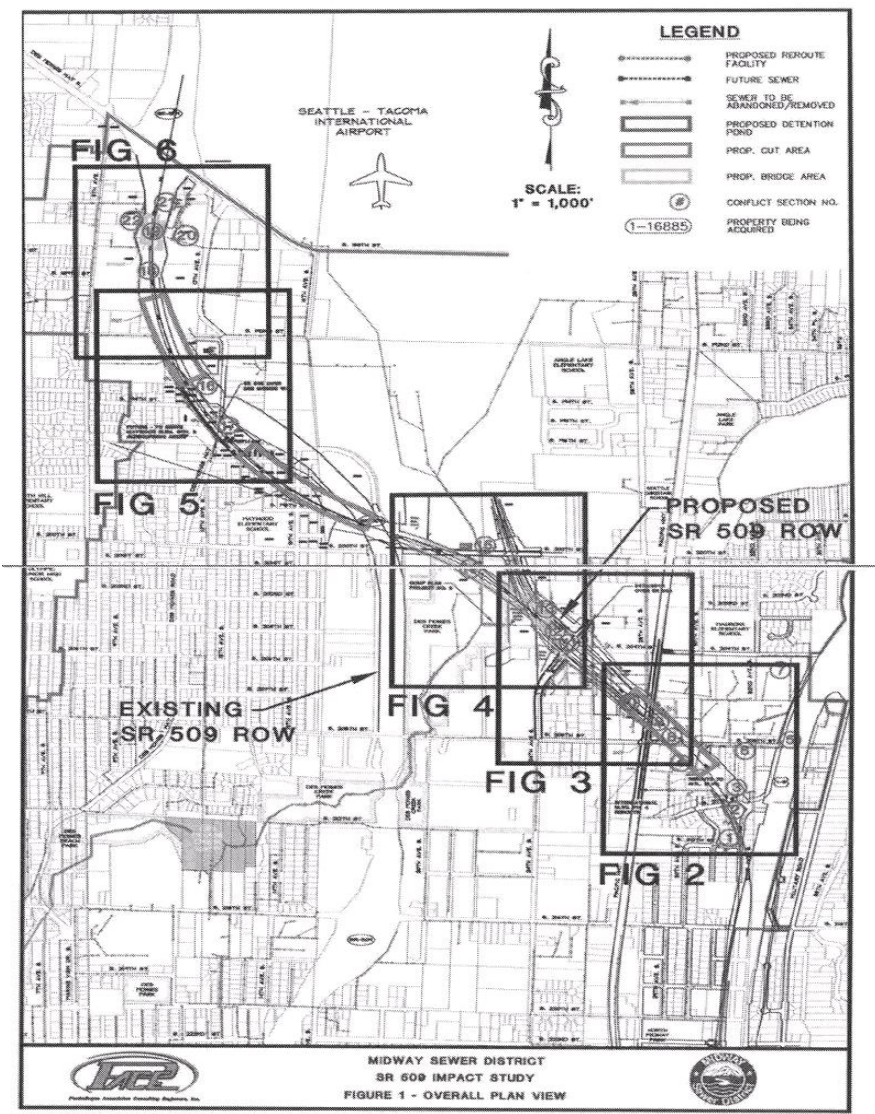
Midway Sewer District
SR 509 Impact Study

highway project will have to be removed rather than left in place. Lastly, an additional 10% has been added to the normal contingency factor for design coordination and review with WSDOT.

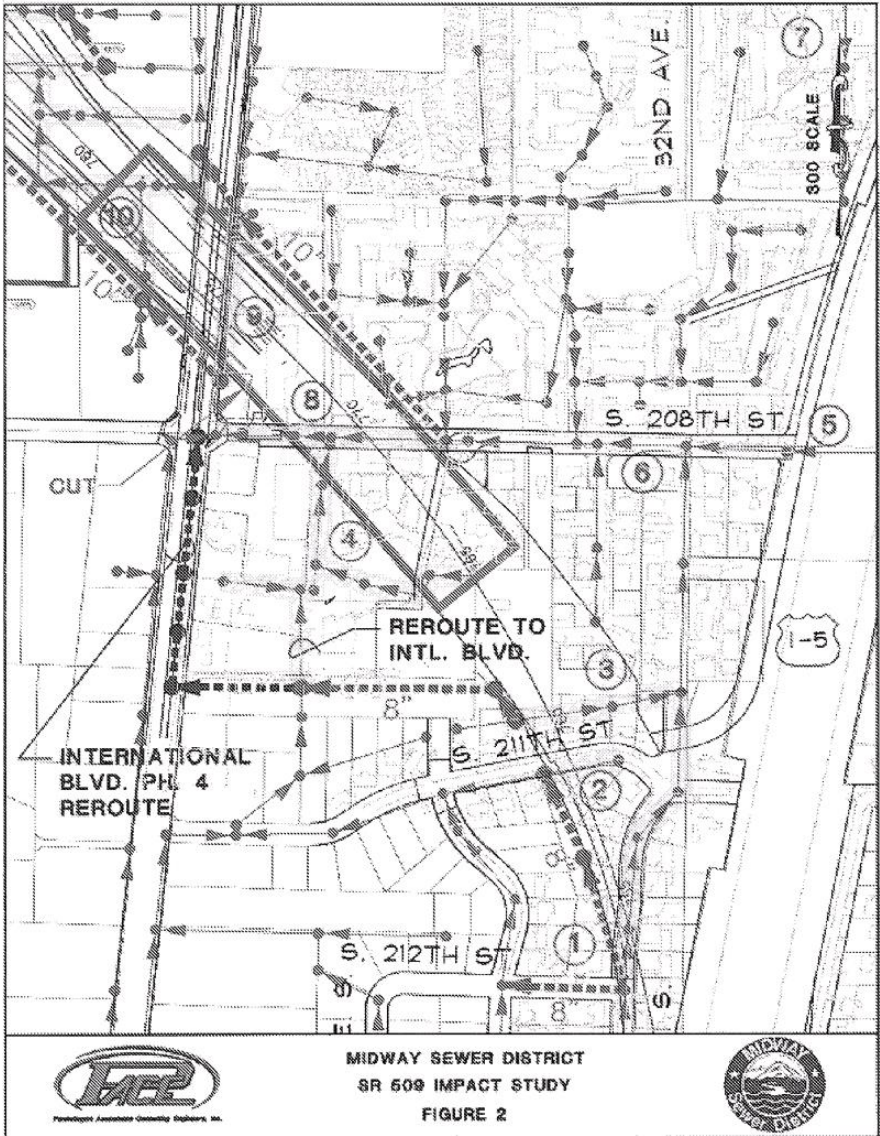
CONCLUSIONS

Construction of SR 509 along the currently proposed alignment will have a significant impact on existing Midway Sewer District facilities in that the proposed ROW bisects several trunk lines and interrupts the natural drainage paths of the current landscape. It appears at this stage that gravity rerouting of all affected flows can be accomplished. This should be a top priority in the design of new facilities, even if the initial construction costs are higher, as the addition of lift stations would result in increased operation and maintenance costs for the District for years to come.

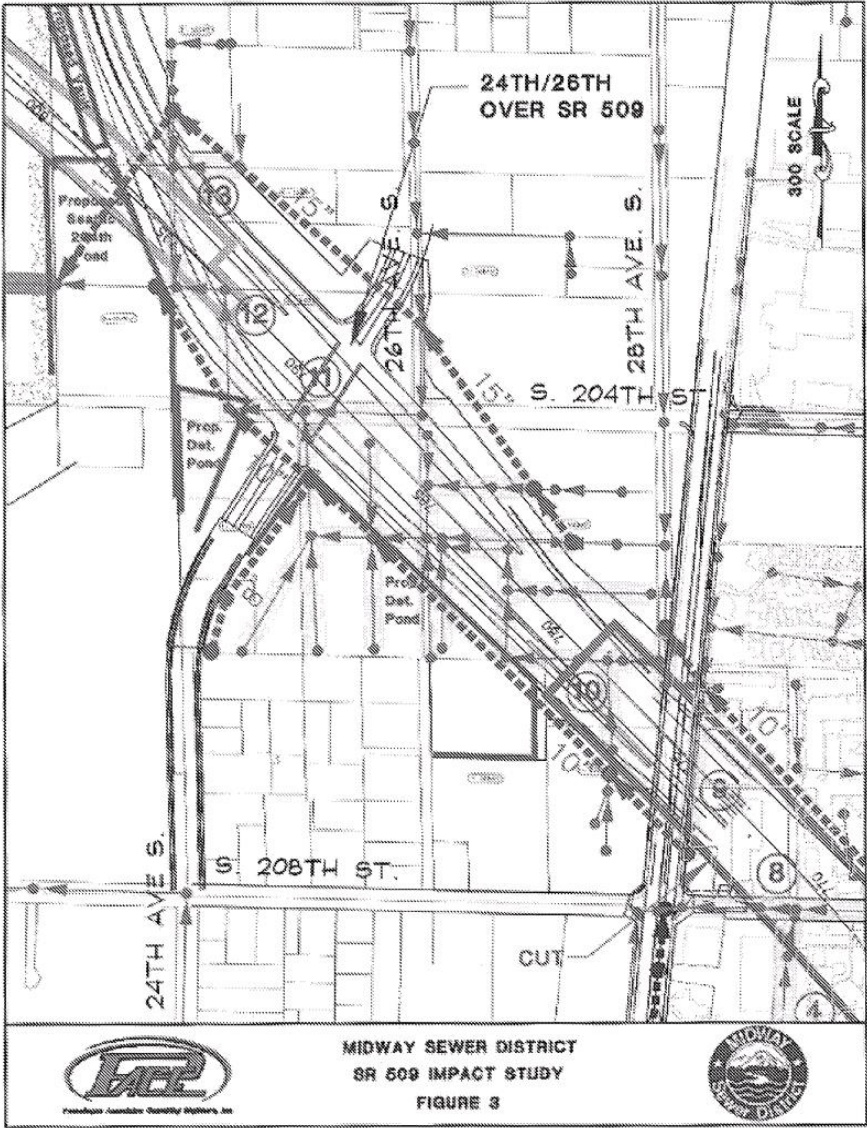
No Comments



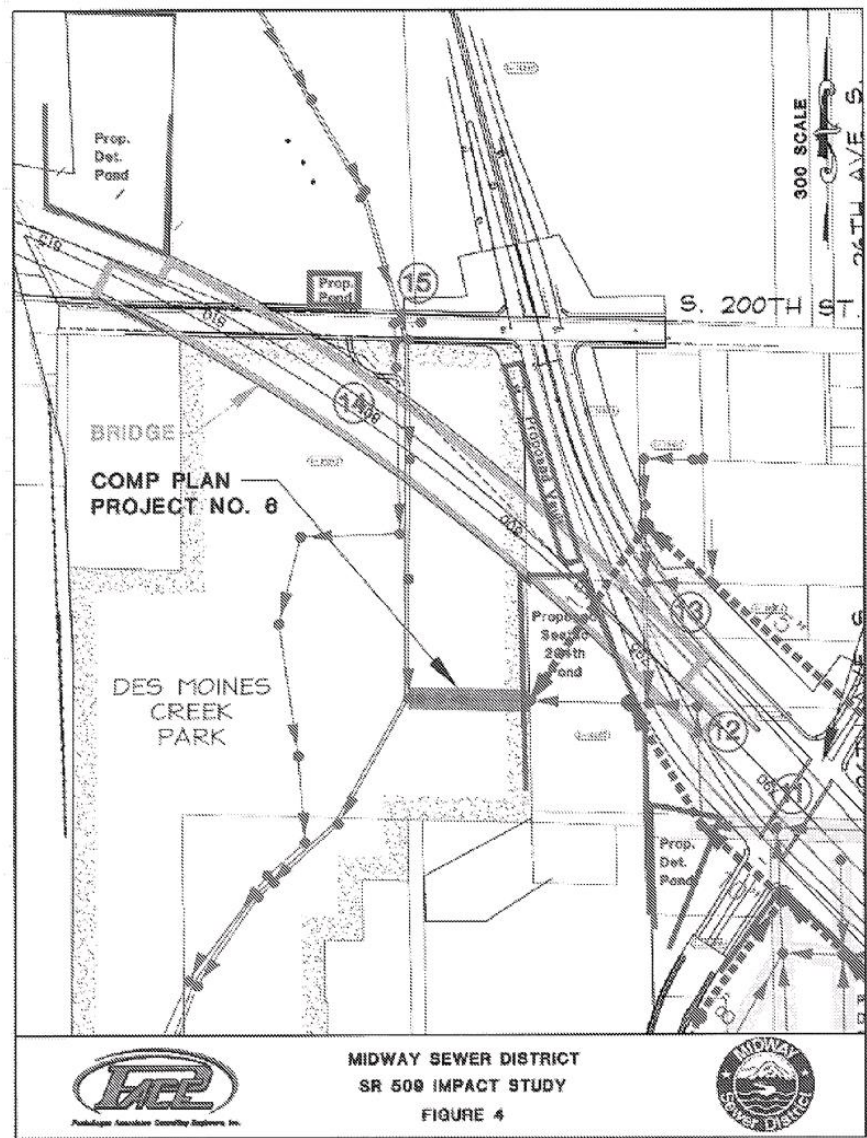
No Comments



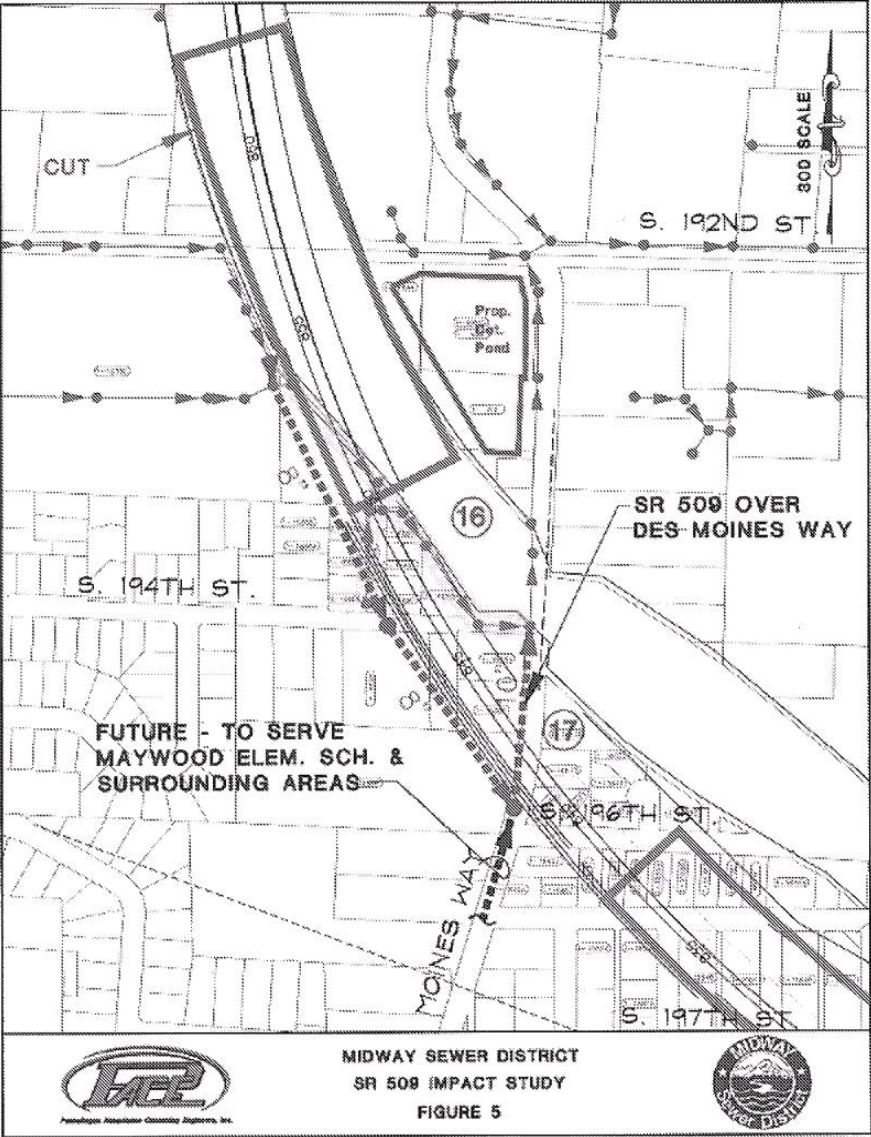
No Comments



No Comments



No Comments

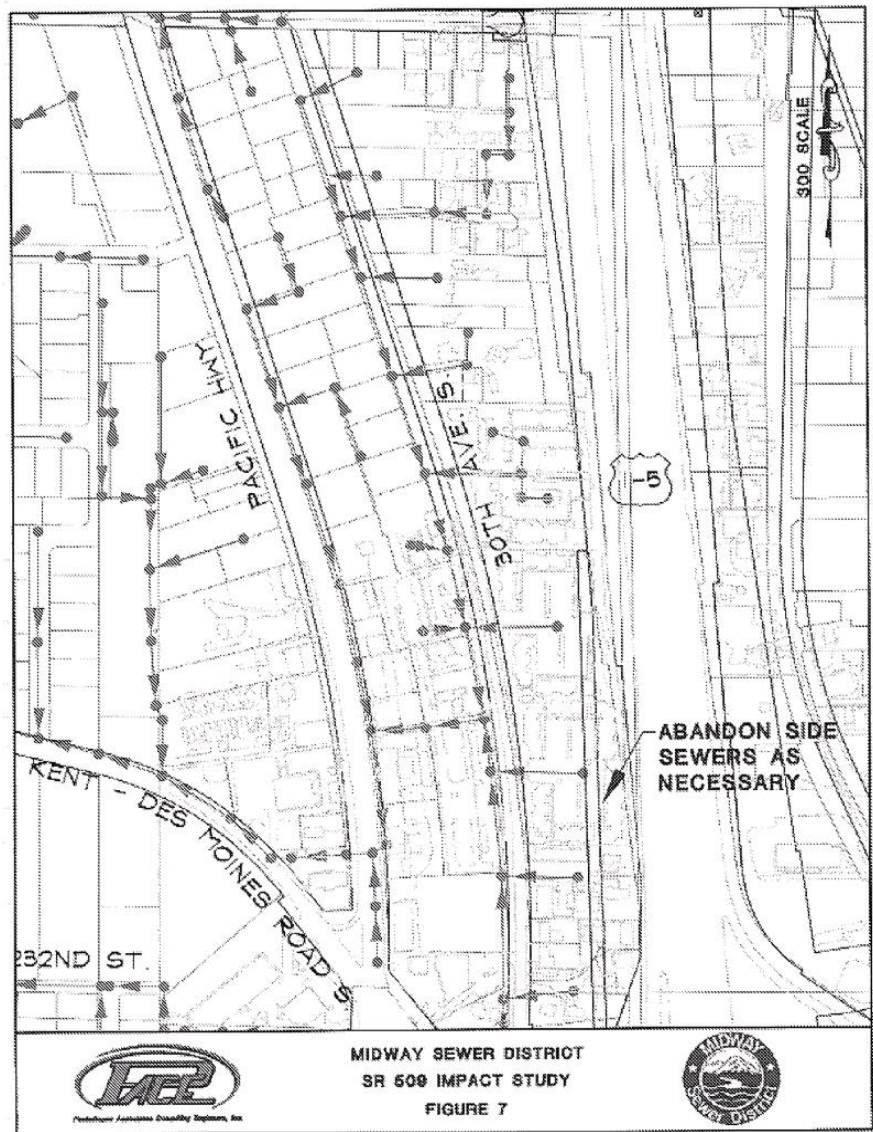


The map illustrates the proposed sewer line (SR 509) and its impact on the surrounding area. Key features include:

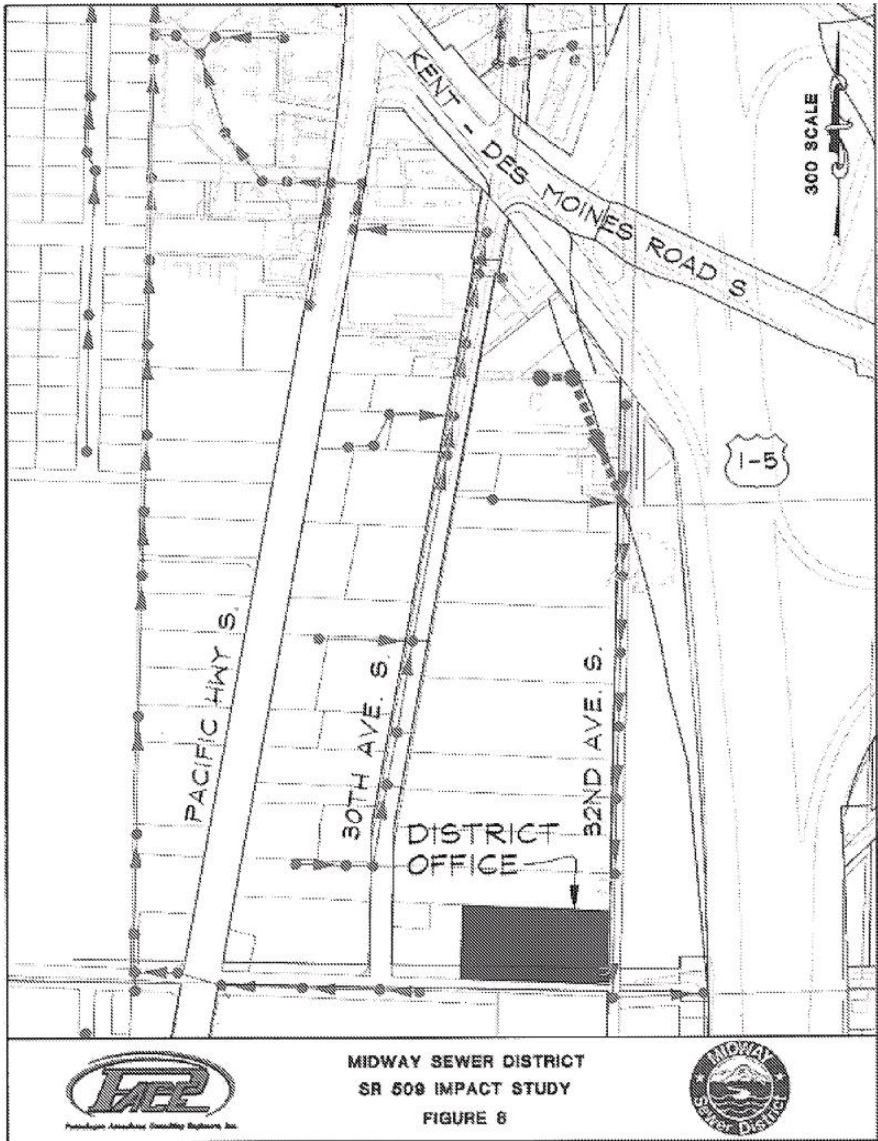
- Streets:** 8TH AVE. S, 12TH AVE. S, and S. 192ND.
- Infrastructure:** A bridge crossing the sewer line, a cut section, and several proposed detention ponds (Prop. Det. Pond).
- Labels:** BRIDGE, CUT, and various numbered labels (18, 19, 20, 21, 22) indicating specific points or sections along the sewer line.
- Scale:** A scale bar indicating 300 feet.
- Logos:** The logo for FACE (Professional Association of Sewer Engineers, Inc.) and the Midway Sewer District logo.

**MIDWAY SEWER DISTRICT
SR 509 IMPACT STUDY
FIGURE 6**

No Comments



No Comments



No Comments

SR 509 Midway Sewer District Sewer Conflict Matrix

CONFLICT BY LOCATION					Impact and Proposed Solution	Approximate Length & Size	Project Cost	Cost Paid By
Section No	Order #	Location	Impacted	Statement				
1	15	Sta 717+00 (2nd Ave St)	YNE	Existing sewer line will be cut by SR 509. Anticipate to be in route to west of S. 21st St. (Ref. SR 14, 14.5 Plans)	Abandon/renew approx. 850 LF of existing main within ROW. Reroute sewer to S. 21st or S. 212th as necessary to pick up all customers. 340 to 855 feet of new sewer.	600 LF 18"	\$247,200	District
	2	Sta 718+50 (S. 21st St)	YNE	Existing Sewer flows west. Portion cut by SR 509 can be abandoned.	Abandon/renew west 200 LF of main within ROW, install Manhole per J&M 22/24x14. ROW line. (Depends on results for Sta. 13)	400 MH	\$15,000	District
3	15	Sta 765+00	YNE	Existing Sewer line will be cut by SR 509. Abandon to east. Reroute (10/13) (noted) remainder to west.	Abandon approx. 440 LF to east. Reroute line to be rerouted to north and west to pick up 3 houses remaining on W. side of 50th. Reroute will require adjustments to flow profile and grades.	650 LF 18"	\$228,750	WSDOT
	4	Sta 765+00 (LI)	YNE	Abandon portion of existing sewer in new SR 509 ROW.	Abandon/renew from as necessary (approx. 1,000 LF). Properties to be rerouted by WSDOT. Current system in this area is being rerouted as part of International Bank improvements.	1,000 LF 18"	\$400,000	District
5	16	S. 200th (I-5 Sta 205+00 to I-5 Sta 21+00)	LYE	Probably no impact to sewer line. Check cross section for possible impact from wall loading on west side of I-5. Perform SUE.	Line is actually at S. 208th St. Coordinate design of wall to ensure that bridge do not impact existing sewer line.	N/A	-	-
	6	208 Line along S. 208th St.	LYE	Line runs along S. 208th St. May have minor impact (M) (estimated) with reconstruction of S. 208th St.	Adjust 5 manholes as necessary to final street grade.	N/A	\$2,500	District
7	17	S. 204th St	LYE	Line runs along S. 204th St. May have minor impact (M) (estimated) with reconstruction of S. 204th St.	Adjust 4-6 manholes as necessary to final street grade.	N/A	\$2,500	District
8	2	Sta 768+00 to Sta 770+00 (S. 208th St)	LYE	Existing sewer line is near SR 509 cut area, possibly impacting line. Main Holes on east have to be relocated outside of ROW. District would like to run along south side of new SR 509 to SR 50.	Line at S. 208th will be cut. Approx. 650 LF of main to be removed. Construct parallel gravity main along NE ROW line to pick up sewers on north side of 50th.	1,100 LF 18"	\$417,500	District
	9	Sta 771+00 (SR 99)	YNE	SR 509 will cut existing sewer line. Crossing new SR 509 @ SR 99 will be problem for sewer. Consideration will be given to relocating line to East where it can cross SR 509 where there is to cut.	Line on E. side of Plac. May will be cut. Abandon/renew 550 LF of main. Must include 10' tank to NW along S. side of ROW. Can pick up sewers to the NW as necessary. Coordinate alignment with pond construction.	2,250 LF 18"	\$797,500	WSDOT
10	2	Sta 776+00	YNE	SR 99 discharge to west / Execute South to be impacted. Part of SR 99 solution.	Main sewer line in ROW and adjacent properties to be abandoned (approx. 5,500 LF in Sections 10-12). Connect sewers as necessary to new gravity main north and south of 50th.	1,600 LF 18"	\$1,165,000	WSDOT
	11	Sta 776+00 to Sta 776+00 (Mobile Home Park)	YNE	Existing sewer lines will all have to be relocated, because of water fill and location of existing manholes. District will look at options and evaluate.	Up to 12 feet of 18". Crossing at 204th must be removed due to placement of retaining walls. Connect sewers as necessary to new gravity main north and south of 50th.	Part of 9 & 10	-	WSDOT
12	4	Sta 773+00	YNE	Perform SUE to locate existing manhole and connecting lines, then evaluate impacts and review design.	Reroute lines to outside of ROW.	Part of 9 & 10	-	WSDOT
	13	Sta 776+00 (PL) / Pottery TR Line @ Sta 774+00	LYE	Potential impact from wall loading. Manhole location can not remain. Perform SUE. Check cross section.	Abandon 650 LF inside ROW. Reroute line to outside ROW. Construct new manhole crossing under proposed 50th bridge.	650 LF 18"	\$121,250	WSDOT
14	4/5	Sta 804+00	YNE	3 existing sewer lines. Perform SUE to aid bridge design in meeting them w/ footings.	Sewer mains have to Dis. Mores W/ WTP. Bridge built overhead, should not be any deep piers. Caution should be taken during construction.	N/A	-	-
	15	Sta 804+00 (S. 200th St)	LYE	30", 24" & 18" lines all cross S. 200th. Raising grade should not impact, as pipes are all concrete. District is considering new line to West along S. 200th when could conflict w/ possible future plan of SR under S. 200th St.	Adjust manholes as required.	N/A	Unknown	District

Y = Conflict with utility
N = No conflict with utility
LY = Unimpacted outflow
1 = Top of Road Utility Map
2 = Sewer Connection Utility Cross Map
3 = Utility Right of Way, WSDOT Map
4 = Sewer Connection Utility Cross Map

No Comments

SR 509 Midway Sewer District Sewer Conflict Matrix

COMPILED BY WSDOT					Impact and Proposed Solution	Removal Length & Size	Project Cost	Cost Paid By
Section No.	Station	Location	Impacted	Remarks				
16	Sta 846+00 to Sta 857+00 (S 16th St to S 15th St)	Y/E	District will evaluate re-routing possibilities in this area and discuss at next meeting.	Abandon/Remove 1,400 LF in ROW. Service on W side of ROW will be relocated by Truckway cut. Relocate to S 16th and then N on the Mainline Way.	500 LF 12" 1,400 LF 8"	\$990,000	WSDOT	
17	Sta 842+00 (Des Moines Mem Dr.)	N/A	District considering new line along Des Moines Mem Dr.	Future extension to south on Des Moines Way to serve Maywood Elem School and surrounding area is feasible. 500 passes over Des Moines Way.	Future	Future	District	
18	Sta 865+00 to Sta 870+00 (LL)	N/E	Existing Sewer line along west ROW. Perform SUE. Check design. Evaluate impact of SR 509. Possibility of abandonment.	Line referenced is already abandoned. Alternative service to area has been installed and should not be impacted by SR 509 improvements.	N/A	-	-	
19	Sta 872+00	N/E	Existing sewer line will be spanned by new bridge. Perform SUE to aid bridge design in footing design and placement.	Coordinate design with District to insure bridge footings do not impact line.	N/A	-	-	
20	East of Rt 7, Sta 874+00	N/E	Existence of this access requires relocation (the needs investigation). No Project impact.	Coordinate design with District to insure bridge footings to not impact line.	N/A	-	-	
21	Sta 872+00 to 878+00 (Rt 7 East)	U/E	District now want to relocate existing sewer line and install outside of east ROW to allow for potential future service. This line needs to be maintained.	Existing line is in proposed pond. Abandon 620 LF. Relocate line to the west to maintain service to area.	750 LF 8"	\$219,750	WSDOT	
22	Sta 872+00 to 874+00 (LL/Vent)	U/E	No project impact anticipated. Near north end of new bridge. Check cross sections. Perform SUE.	Line will be within new ROW. Abandon 500 LF. Relocate line to outside ROW.	500 LF 8"	\$132,500	WSDOT	

\$4,782,500

I-5 Midway Sewer District Sewer Conflict Matrix

COMPILED BY WSDOT					Impact and Proposed Solution	Removal Length & Size	Project Cost	Cost Paid By
	Locations	Impacted	Remark					
8	Sta 2167+00 (S 25th Plank)	N/E	Bridge widening should not impact existing sewer line which is behind the existing curb. Existing sewer line is broken and needs repair. Perform SUE.	Use of repairs unknown. District to repair line as necessary.	N/A	Unknown	District	
10	Sta 2230 (LL)	N/E	Condensate pump is connected to landfill pond. Project not expected to add condensate volume. (Service Agreement is needed if it does)	No impact.	N/A	-	-	
10	Sta 2240 To Sta 2249 (LL, south of S 24th Street)	N/E	Existing sewer line parallel to and outside I-5 west ROW. No impact (Pond 1 is a vault inside I-5 ROW).	No impact.	N/A	-	-	
11	Sta 2255 To Sta 2260 (LL, along 22nd St)	U/E	New SR on-ramp will impact existing sewer line. Perform SUE. District is preparing relocation concept.	Abandon 270 LF in 22nd Ave. S. Pipe/lines being covered by line will most likely be taken for ROW. Relocate line outside west ROW line.	450 LF 8"	\$150,750	District	
13	Sta 2260 To Sta 2262 (LL, south of S 22nd Street)	U/E	Sewer line is parallel to I-5, need to locate from as-built to determine probability of impact.	Appears to be no impact.	N/A	-	-	
11/12	Sta 2275 To Sta 2282 (LL)	Y/E	A number of side sewer connections will need to be cut off.	Buildings may potentially be removed for southbound off-ramp. Side sewers flowing to 20th Ave. S. may be required to be capped.	N/A	Unknown	WSDOT	

Revised April 26, 2004
* Relocation solutions are interdependent
Relocation solutions are interdependent

Revised April 26, 2004
* Relocation solutions are interdependent
Relocation solutions are interdependent

C - Confirmed with
N - No conflict with data
U - Unconfirmed conflict

I - First six feet from I-5 right of way
E - Eastern WSDOT Area

R - Only Right of Way Violation #s
S - Limited Construction Takeover #s

Letter FW338

City of Federal Way

No Comments

Page 1

From: [Amy Jo Pearsall](#)
To: [FWLE](#)
Subject: Public Comment on Federal Way Link Extension Draft EIS
Date: Thursday, May 21, 2015 3:14:32 PM
Attachments: [Resolution 15-686.pdf](#)

To Sound Transit:

Please see the attached complete Resolution adopted by the City of Federal Way City Council on May 20, 2015. This resolution contains the City of Federal Way's comments about the project alternatives and station options.

Thank you,

Amy Jo Pearsall

City Attorney

City of Federal Way

(253) 835-2570

apearsall@cityoffederalway.com

RESOLUTION NO. 15-686

A RESOLUTION of the City Council of the City of Federal Way, Washington, identifying and making a recommendation for a preferred alignment and station locations for the Federal Way Link Extension to Federal Way.

WHEREAS, in 2008, the voters authorized the Central Puget Sound Transit Authority (“Sound Transit”) under the Sound Transit 2 Plan (“ST2”) to proceed with an expansion of its Link Light Rail Transit service to the City of Federal Way (“Federal Way Extension”); and

WHEREAS, the Federal Way Extension will benefit City residents and businesses and will serve as a catalyst for new development in the City Center Area; and

WHEREAS, Sound Transit released a Draft Environmental Impact Statement (“DEIS”) on April 10, 2015 with a public review and comment period closing on May 26, 2015; and

WHEREAS, the DEIS identified multiple potential alignment and station locations for the extension to the City; and

LJ10-1 WHEREAS, the alignment locations include routes generally along I-5 and SR 99 between S 200th Street in the City of SeaTac and Federal Way’s City Center; and

WHEREAS, stations are proposed in the vicinity of Highline Community College, S 272nd Street, and the Federal Way City Center; and

WHEREAS, Sound Transit determined in its DEIS that, in comparison to alternative alignments along SR 99, alternative alignments along I-5 would affect the lowest number of parcels, would displace the fewest businesses, would convert the least amount of land from developable to undevelopable property, would have the lowest adverse impacts on City tax revenues, would create the lowest number of visual and noise impacts, would have the lowest cost, and would have with

Resolution No. 15-686 *Page 1 of 5*

Response to Comment LJ10-1

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

roughly equivalent ridership and travel times; and

WHEREAS, on average alternative alignments along SR 99 will cost \$400 Million more than alternative alignments along I-5; and

WHEREAS, the least expensive alternative alignment along SR 99 (\$1.72 Billion) would cost \$280 Million more than the most expensive alternative alignment along I-5 (\$1.44 Billion); and

WHEREAS, alternative alignments along SR 99 would impact businesses that had already been disrupted with the \$100 Million improvements and reconstruction of SR 99; and

WHEREAS, alternative alignments along SR 99 would provide transit service that is duplicative to Metro's RapidRide A Line and leave remnant parcels that may not be able to be redeveloped; and

WHEREAS, while an SR 99 alignment may provide more land with transit-oriented development potential at the 272nd station location, continued weak market conditions may negate any potential benefits associated with such development; and

WHEREAS, these concerns about an SR 99 alignment exist with a potential future extension to Tacoma; and

WHEREAS, station locations that are as close as possible to Highline Community College would maximize ridership; and

WHEREAS, station locations that are as close as possible to Federal Way Transit Center would assure good transit connections; and

WHEREAS, station locations that provide good pedestrian connections to existing and planned developments in the City Center would improve the viability of economic development in

the City Center; and

WHEREAS, station locations that are as close as possible to the existing transit station would facilitate better cross connections between transit modes and improve the overall efficiency, usability, and desirability of the transit system; and

WHEREAS, station locations in the east portion of the city center, rather than the west portion, will provide excellent opportunities for transit-oriented development with less negative impact associated with guide way encumbrances, while still facilitating an I-5 alignment; and

WHEREAS, the City of Federal Way wishes to make Sound Transit aware of the issues raised for the City in the DEIS so they will be considered by Sound Transit for their determination of a "Preferred Alternative."

NOW THEREFORE, THE CITY COUNCIL OF THE CITY OF FEDERAL WAY,
RESOLVES AS FOLLOWS:

Section 1. City Concerns. The City's issues, concerns, comments, resulting from Sound Transit's DEIS are hereby forwarded to the Sound Transit Board to be addressed and considered prior to selecting a "Preferred Alternative."

Section 2. Preferred Alignment. Based upon a detailed analysis of the alternatives, review of the DEIS, and public outreach, the City Council hereby expresses its preference for an I-5 alignment as identified in the DEIS;

Section 3. Preferred Station Location near Highline Community College. Based upon a detailed analysis of the alternatives, review of the DEIS, and public outreach, the City Council hereby expresses its preference for a station location that is as close as possible to Highline College,

but still facilitates an I-5 alignment, the exact location and details of which should be negotiated with the City's affected regional partners including the Cities of Des Moines and Kent and Highline College.

Section 4. Preferred Station Location in City Center. Based upon a detailed analysis of the alternatives, review of the DEIS, and public outreach, the City Council hereby expresses its preference for a hybrid station location generally located along 23rd Avenue S straddling S 320th Street that would be consistent with an extension to Tacoma along I-5.

Section 5. Severability. If any section, sentence, clause or phrase of this resolution should be held to be invalid or unconstitutional by a court of competent jurisdiction, such invalidity or unconstitutionality shall not affect the validity or constitutionality of any other section, sentence, clause or phrase of this resolution.

Section 6. Corrections. The City Clerk and the codifiers of this resolution are authorized to make necessary corrections to this resolution including, but not limited to, the correction of scrivener/clerical errors, references, resolution numbering, section/subsection numbers and any references thereto.

Section 7. Ratification. Any act consistent with the authority and prior to the effective date of this resolution is hereby ratified and affirmed.

Section 8. Effective Date. This resolution shall be effective immediately upon passage by the Federal Way City Council.

RESOLVED BY THE CITY COUNCIL OF THE CITY OF FEDERAL WAY,
WASHINGTON this 19th day of May, 2015.

CITY OF FEDERAL WAY


MAYOR, JIM FERRELL

ATTEST:


CITY CLERK, STEPHANIE COURTNEY, CMC

APPROVED AS TO FORM:


CITY ATTORNEY, AMY JO PEARSALL

FILED WITH THE CITY CLERK: 05/15/2015
PASSED BY THE CITY COUNCIL: 05/19/2015
RESOLUTION NO.: 15-686

Letter FW523

City of Federal Way

No Comments

Page 1

From: [Isaac Conlen](#)
To: [FWLE](#)
Subject: FW: ST DEIS Letter
Date: Tuesday, May 26, 2015 4:57:50 PM
Attachments: [ST DEIS Technical Comment Letter.docx](#)
[ST DEIS Technical Comment Letter.pdf](#)

Technical comments on the DEIS. Thanks for the opportunity to comment.

Isaac Conlen
Planning Manager
253 835 2643

From: Tina Piety
Sent: Tuesday, May 26, 2015 4:56 PM
To: Isaac Conlen
Subject: ST DEIS Letter

Hi,
I've attached pdf and Word documents of the letter.
Tina



Jim Ferrell, Mayor

Federal Way Link Extension Draft EIS Comments
Sound Transit
401 South Jackson Street
Seattle, WA 98104
FWLE@soundtransit.org

May 26, 2015

Re: Federal Way Link Extension – DEIS Technical Comments

Dear Mr. Hale and Mr. Ridge:

- LJ12-1 [Thank you for the opportunity to comment on the Federal Way Link Extension DEIS. First, we want to congratulate the Sound Transit staff and consultants on pulling together a comprehensive and thoughtful document. In addition, we have been very pleased with the process and the collaborative nature of our relationship with the agency.]
- LJ12-2 [The City has taken an official position with regard to alignment and station location by passage of Resolution 15-686. The Mayor has added to that position by signing a joint letter with the mayors of Des Moines, Kent, and SeaTac, expressing that same preference.
The below comments are of a technical nature and are intended to supplement the City's above referenced forms of public comment.]
- LJ12-3 [Page 3-2, Table 3-1, Safety, 1st Bullet
Design would have to assure new structures do not create sight distance problems.]
- LJ12-4 [Page 3-2, Table 3-1, Safety, 2nd Bullet
We respectfully disagree with the conclusion that increased conflict rates between pedestrians and motor vehicles would not result in an increase in collision rates. Please provide rationale for this conclusion.]
- LJ12-5 [Page 3-12, Section 3.4.5, 2nd Paragraph
Based on our observation, what little on-street parking available near the Federal Way Transit Center is over 100% utilized (vehicles are frequently parked beyond permitted parking areas, obstructing sight distance at driveways). Adequate parking capacity is an ongoing concern of the City.]
- LJ12-6 [Page 3-16, Table 3-6, Daily Volumes
Volumes shown are roughly double those of existing volumes. If they are two-way volumes, then the volumes by direction should be identical. Please clarify.]
- LJ12-7 [Page 3-49, 3rd Paragraph, Last Sentence
We are concerned about the suggestion that excess capacity would be available for station locations in Federal Way City Center area. Although capacity exists at the South 320th Street Park and Ride, this is due to the relative dearth of all-day service between the South 320th Street Park and Ride and popular destinations, or even all-day service between the South 320th Street Park and Ride and Federal Way Transit Center. As long as the new station is an interim terminus until light rail can be extended to Tacoma, light rail can be expected to draw a substantial number of commuters from Pierce County, as was the case before Sound Transit provided bus service between Pierce County and Seattle.]

Response to Comment LJ12-1

Thank you for your acknowledgement. Sound Transit will continue to work with the City during development of the FWLE project.

Response to Comment LJ12-2

Please see responses to letter FW315, the letter submitted with other mayors.

Response to Comment LJ12-3

The design would adhere to the relevant design standards, including those for sight distance.

Response to Comment LJ12-4

Table 3-1 in Chapter 3 has a revised statement noting that there is an increased potential for conflicts.

Response to Comment LJ12-5

Please see Section 3.5.5 of the Final EIS for the parking impact analysis. Also see response to Common Comment 5 in Table 9-6 in Chapter 9, and Section 4.5.1 of the Transportation Technical Report (Appendix G1) for further information on the proposed parking supply at FWLE stations.

Response to Comment LJ12-6

The volumes shown in this table are by direction for year 2035. These are based on the travel demand forecasts prepared by Puget Sound Regional Council for the region.

Response to Comment LJ12-7

Please see response to Common Comment 5. The proposed parking supply in the project area is sufficient to meet the demand of the forecasted ridership. The supply includes 400 more stalls at the Federal Way Transit Center and up to 800 more parking spaces at the Star Lake Park-and-Ride adjacent to I-5. Conceptual bus service plans developed by King County Metro and Sound Transit incorporate service between the

Page 2 (continued)

Federal Way Transit Center and S 320th Park-and-Ride so that light rail riders could park at the park-and-ride. Sound Transit bus service from Pierce County would also continue.

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May 26, 2015

- LJ12-8** [Page 3-55, Section 3.5.6.2, Last Sentence
Sound Transit would not be providing pedestrian crossings as these already exist at these intersections.
- LJ12-9** [Page 4.2-24
The second paragraph states that the I-5 Station Option has the lowest TOD potential. The next paragraph states the South 320th Park and Ride Station Option is the least supportive of TOD in the Federal Way station area. Please correct this inconsistency.
- LJ12-10** [Exhibit 4.4-2
This map should include a religious institutions facility for Calvary Lutheran church located on 320th just west of I-5.
- LJ12-11** [Page 4.4-9
In the paragraph that starts on page 4.4-8 and continues onto page 4.4-9 we recommend that you make specific reference to the Town Square Park as it is and will be a central feature of the City Center.
- LJ12-12** [Table 4.17-2 – Page 4.17-5
Under “Direct Impacts” the conclusion is that no adverse effects on recreational resources will occur. We believe that loss of parking spaces is an adverse impact on the park. Additionally, a water quality rain garden in the southeast corner of the site would be displaced. Consider modifying the language. We believe the impacts can be mitigated, so potentially say “No *un-mitigatable* adverse effects. . .”
- LJ12-13** [Page 7-15
Consider modifying the second bullet. First, the City also has a significant eastern European population. Second, the statement “The City of Federal Way is not a close-knit community” is more a matter of opinion so we would suggest dropping that language. Likewise, we would suggest eliminating the characterization about spokesperson and attendance at Council meetings.
- LJ12-14** [General Comment
The above referenced City resolution describes a City Center station option not discussed in the DEIS. We understand that additional analysis will need to be completed to determine the feasibility of this option (west of 23rd Avenue South and straddling South 320th Street). One potential advantage we see in this station location is that it could serve to provide a pedestrian connection across South 320th Street. We would be interested in understanding what design accommodations could be made, if any, to facilitate that secondary function.

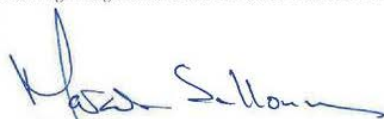
Consider how pedestrian/bicycle connections will be made between the City’s preferred station location and the existing station just to the north.

Again, thank you for the opportunity to participate in the process. Please do not hesitate to contact us if you have any questions. Please direct questions to Planning Manager Isaac Conlen. He can be reached at 253 835-2643, or isaac.conlen@cityoffederalway.com.

Sincerely,



Michael A. Morales
Community Development Director



Marwan Salloum
Public Works Director

cc: Mayor Ferrell
Isaac Conlen, Planning Manager

Brian Wilson, Chief of Staff
Rick Perez, City Traffic Engineer

Response to Comment LJ12-8

Chapter 3 was revised to state that these crossings are already present.

Response to Comment LJ12-9

Please see the revised discussion of TOD in Section 4.2, Land Use, of the Final EIS. The terms “TOD potential” and “supportive of TOD” had different meanings related to different measures in the Draft EIS. TOD potential, which referred to the land availability measure, has been replaced with a measure of development potential.

Response to Comment LJ12-10

Exhibit 4.4-2 has been updated to include the Calvary Lutheran Church.

Response to Comment LJ12-11

Text has been added to describe Town Square Park in Section 4.4.

Response to Comment LJ12-12

Section 4.17 has been revised and the direct impacts discussion discusses impacts on planned park facilities at Town Square Park.

Response to Comment LJ12-13

Sound Transit agrees that information provided to the agency during these meetings can be public opinion and should not be qualified as fact. To avoid misunderstanding, this bullet has been deleted from Chapter 7, Environmental Justice.

Response to Comment LJ12-14

Sound Transit coordinated with the City of Federal Way during the Final EIS regarding the location of this station and re-oriented this station to be north-south and north of S 320th Street. Section 2.1 of Chapter 2, Alternatives Considered, of the Final EIS describes stakeholder workshops to review the FWTC station layout. A pedestrian crossing was not included over S 320th Street because it would need to be a fare-

Page 3 (continued)

restricted zone and would be limited to riders only. Sound Transit will continue to coordinate with the City regarding access improvements.

Letter FW572

City of SeaTac

Page 1



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May 26, 2015

SEPA Responsible Official
Perry Weinberg, Director
Office of Environmental Affairs and Sustainability
Sound Transit
401 South Jackson Street
Seattle, WA 98104-2826

NEPA Responsible Official
Richard Krochalis, Regional Administrator for Region 10
Federal Transit Administration
915 Second Avenue, Suite 3142
Seattle, WA 98174-1002

RE: Draft Environmental Impact Statement for the Federal Way Link Extension (FWLE)

Gentlemen,

The City of SeaTac has reviewed the April 10, 2015 Draft Environmental Impact Statement (DEIS) for the FWLE, and is formally submitting this letter as our official comments on the DEIS. It is noted in the DEIS that Sound Transit has worked "in cooperation with" the City on this DEIS, but the City is not a co-lead or issuer of the document pursuant to SEPA. Overall, the DEIS is well written, and thorough in its descriptions of the various elements of the proposed extension that are addressed in the DEIS.

Through this letter, the City is specifically asking for written responses to the questions and issues raised, and reserve the rights under SEPA to follow up as necessary prior to final action being taken by the proponent, Sound Transit on the proposal. The City offers the following comments and questions to be addressed in the Final Environmental Impact Statement (Final EIS) before the final decision is reached.

PROCEDURAL:

The DEIS was issued with a variety of statements about the next steps in the process. There is some confusing/contradictory language regarding the selection of the Preferred Alternative that needs to be addressed and clarified in the public record. "It is anticipated that the Sound Transit Board will identify a Preferred Alternative for evaluation in the Final EIS. The Preferred Alternative will be identified after considering the Draft EIS, public and agency feedback, and other relevant information." (Emphasis added. See pages ES.11, 2-26 and elsewhere)

Mayor
Mia Gregerson

Deputy Mayor
Tony Anderson

Councilmembers
Barry Ladenburg
Kathryn Campbell
Terry Anderson
Dave Bush
Pam Fernald

City Manager
Todd Cutts

Assistant City Manager
Gwen Voelkel

City Attorney
Mary Mirante Bartolo

City Clerk
Kristina Gregg

The Hospitality City

Response to Comment LJ15-1

Written responses to the City's comments are provided below and changes have been made to the Final EIS as appropriate. Sound Transit also responded to questions from the City in a letter on June 26, 2015, prior to the Sound Transit Board action to identify a Preferred Alternative.

Response to Comment LJ15-2

This text has been clarified in the Final EIS. As described in the Final EIS, the identification of the Preferred Alternative was not a final decision on the project; all alternatives remain under consideration until the Final EIS is published, after which the Sound Transit Board will select a project to be built and FTA will issue a Record of Decision. Sound Transit's identification of the Preferred Alternative occurred approximately 2 months after the Draft EIS public comment period had ended, the Board had reviewed all comments received, the Board had taken testimony at two public hearings, and the agency had continued post-Draft EIS coordination with local agencies, other stakeholders, and the public. The Sound Transit Board will not select the project to build until after the Final EIS is published and all comments on the Draft EIS have been responded to. It may select the Preferred Alternative, a different alternative, or some variation of the alternatives considered in the Final EIS.

The DEIS then indicates that the Board will identify the Preferred Alternative in "mid 2015". Recent public announcements from Sound Transit representatives have indicated that the Board will consider selection of the Preferred Route as early as their June 24, 2015 Board meeting. Further, at least one Board Member has also produced public information coinciding with the release of the DEIS indicating a specific route (I-5/SR 509) as the preferred option.

SEPA acknowledges that the lead agency can identify or designate the preferred alternative "at anytime in the EIS process" (see SEPA Handbook sec 3.3.2.2). It further indicates that early designation in the process can lead to likely changes in the preferred alternative, but "in no way restricts the lead agency's final decisions".

What is unclear/contradictory is the apparent speed of the Sound Transit Board's decision-making; coming almost immediately after closure of the DEIS public comment period. The concern is the resulting lack of opportunity for meaningful public comment on the preferred alternative since it is outside of the DEIS comment period. Please clarify in the record, how "public and agency feedback" will be duly considered under the applicable laws (SEPA, Open Public Meetings Act, etc) in the short time after the comments are received (and not yet responded to), and before preparation of the Final EIS (which ST representatives have publicly stated will be released about this time in 2016).

While the stated actions meet the letter of the law, the actions do not seem to meet the clear intent of these laws. Written clarification in the public record is requested prior to the Board's selection of a preferred alternative.

SUBSTANTIVE:

	CHAPTER	PAGE	COMMENT
LJ15-3	1.0 Purpose	1-3	S. 200 th St. is another major east-west arterial that connects SR 99 and I-5. This correction should be included in the Final EIS.
LJ15-4		1-3	Population figures in the document should include only population within the corridor/likely service area, not entire cities' populations. For example, the east hill of Kent is far removed from any of the alternate routes under consideration. As presented in the DEIS, the population served by the proposed Extension seems to be inflated and should be more accurately presented in the Final EIS.
LJ15-5		1-8	The table should include the City of SeaTac Comprehensive Plan. This correction should be included in the Final EIS.
LJ15-6	2.0 Alternatives	2-11	The potential station at S. 216 th St. does not include any proposed parking. Since this area currently lacks high density residential development, significant parking will be needed. Please describe the probable impacts and mitigation measures needed to address the passengers arriving by car to the station area. Please include the traffic and parking volume estimates to support the impacts and mitigation measures analysis.

Response to Comment LJ15-3

This text has been deleted from Chapter 1.

Response to Comment LJ15-4

Chapter 1 has been revised to discuss population within 1/2 mile as well for larger cities to provide context.

Response to Comment LJ15-5

The purpose of this table is to document regional and local plans that have planned for light rail in the FWLE corridor. The comprehensive plans of each city are not included except for subarea plans for areas intended for high-density development supported by light rail. The City's comprehensive plan is addressed in Section 4.2 and Appendix D4.2 of the Final EIS. These sections address relevant land use plans and policies.

Response to Comment LJ15-6

Parking would not be provided at the potential additional stations associated with the SR 99 Alternative because adequate parking supply would be provided at stations both north and south of each potential additional station. Please see Chapter 3 of the Final EIS for the parking assessment, traffic forecasts at the stations, and potential for neighborhood impacts from parking surrounding the stations.

LJ15-7		2-16	The trench option for the S. 216 th West Station will have significant impacts on existing businesses and commercial properties, amounting to a partial take (at a minimum). This impact needs to be more fully addressed and mitigation measures identified in the Final EIS.
LJ15-8		2-34	Please address the impacts of potentially locating an Operations and Maintenance Facility (OMF) within the corridor. If potential sites have been identified they must be disclosed, specific impacts identified and mitigation measures included in the Final EIS.
LJ15-9	4.2 Land Use	4.2-3	Please note in Table 4.2-2 that SeaTac's 1994 Comprehensive Plan was last updated in 2014. The most current update is scheduled for adoption in June 2015. The Final EIS should contain the most accurate information at time of publishing.
LJ15-10	4.3 Economics	4.3-1 thru 4.3-18	The potential impacts on commercial properties in SeaTac is underestimated by virtue of what the DEIS designates as a "full take". Several parcels along SR 99 will be impacted to the extent that the economic value of the properties including future use and/or the ability to maintain lease agreements with current tenants and major employers will be severely compromised. In some cases entrances to properties will be impacted; in others, a loss of parking may cause the site to be out of compliance with City codes (additional impact). In one case, a future development site will be impacted by the SR 99 options to an extent that the possible future uses of the site will be severely impacted (if not eliminated) and will have a drastic effect on the parcel's value. When properties with existing uses and significant employment are compromised there could be substantial job losses in the community. The loss and/or displacement of all these employees also generate the corresponding potential for significantly reducing light rail ridership. Further, the potential loss of jobs will have an adverse impact on related local commerce and sales tax revenues. Please update the analysis and provide potential mitigation measures in the Final EIS. Assumptions about the potential positive TOD impacts along the light rail corridor seem exaggerated in that any development will most likely occur very near the stations and not generally along the guideways themselves. This is based on the evidence clearly demonstrated along Sound Transit's existing guideway and surrounding its existing stations. Additionally, the cost of assembling property and the associated cost of demolishing existing structures will make the redevelopment of the designated TOD areas much more expensive and probably not economically feasible for years to come. Please update the analysis and conclusions in the Final EIS.
LJ15-11			
LJ15-12	4.4 Social Impacts	4.4-1	Please clarify which of the alternatives will potentially bisect any neighborhood within SeaTac. Please provide analysis of the impacts and mitigation measures to address these separated neighborhoods. Other

Response to Comment LJ15-7

Impacts on businesses and commercial properties for all alternatives are assessed in Section 4.3, Economics, of the Final EIS.

Response to Comment LJ15-8

As stated in Section 2.2.7, vehicles operating on the FWLE would be serviced out of the OMF in Seattle. Overnight storage and daily inspection and interior cleaning of up to four four-car trains would be provided at the end of the line (Federal Way Transit Center station, tail tracks, and/or nearby pocket track) to support the beginning of light rail service each morning. An additional OMF would not be needed south of the Seattle OMF until the light rail extends south from Federal Way.

Response to Comment LJ15-9

The Final EIS has been updated to include the City of SeaTac's latest revision to the Comprehensive Plan, which was adopted in June of 2015.

Response to Comment LJ15-10

Sound Transit takes these factors into consideration when determining whether a property would be a full or partial take. If the existing use would no longer be viable, then the full property would be acquired. Although the loss of jobs in the area would have an immediate impact, ridership is based on PSRC growth projections, not existing land uses. This loss would have an impact on sales tax as well, but construction activities would create a new source of sales tax for several years.

Response to Comment LJ15-11

The goal of the assessment was to estimate the TOD potential near stations. The guideway could have a negative impact on development potential between station areas. Section 4.3, Economics of the Final EIS describes negative impacts on development potential.

Page 3 (continued)***Response to Comment LJ15-12***

None of the alternatives would bisect neighborhoods in SeaTac or elsewhere in the corridor. The alternatives identified in the Final EIS would travel along the edges of the neighborhoods, generally follow existing transportation corridors, and provide grade-separated crossings of roadways to maintain connectivity between properties on either side of the guideway.

FWLE DEIS Comments Page 4 of 8		
LJ15-12		comments in this letter identify some of the probable discussions and should be addressed in all applicable locations in the Final EIS.
LJ15-13	4.4-1	Please clarify whether the “fewer noise/visual impacts” associated with the I-5 Alternatives are already assuming and including impacts from future SR 509 construction. Please correct the analysis and conclusions accordingly in the Final EIS.
LJ15-14	4.5 Visual/Aesthetics 4.5-19	Please clarify how “architectural aspects of the FWLE, where visible from I-5, would be coordinated in color, texture and materials to be consistent with the existing architectural features in the corridor”. Does this mean different designs than have been used in constructing the existing Link guideway north of the project area? Please correct the analysis and conclusions accordingly in the Final EIS.
LJ15-15	4.8 Water Resources 4.8-8	The second paragraph in Section 4.8.3.4 incorrectly states that meetings were held with SeaTac stormwater/NPDES compliance staff. It does reference communication with a member of SeaTac’s development review staff (Mike Bryan), but no discussions were held with the City’s stormwater staff or the Stormwater Compliance Manager. Please correct these statements, and the analysis and conclusions in the Final EIS.
LJ15-16	4.8-8	The information concerning the Executel Pond is inaccurate. The pond is owned by the Washington State Department of Transportation and is not planned to be relocated by WSDOT until the SR 509 extension project is built. The SR 509 project has been on hold, pending additional state funding, since approximately 2006. The Final EIS should contain the most accurate information at time of publishing.
LJ15-17	4.8-8	While the City of SeaTac does not have any serious drainage concerns along the alternative light rail corridors, the City is aware of existing drainage problems downstream of the proposed light rail corridors on non-city owned property including within the Executel Pond and immediately downstream of the pond. Please correct the analysis and conclusions accordingly in the Final EIS.
LJ15-18	4.13 Electro-magnetic Fields 4.13	Please describe in the Final EIS how potential electromagnetic field impacts to below-ground utility lines (particularly fuel and high-pressure natural gas) will be mitigated?
LJ15-19	4.14 Public Services/Safety 4.14-2 (Table 4.14-1)	Allied Waste is incorrectly noted as the solid waste contractor in SeaTac. This should be changed to Recology CleanScapes in the Final EIS. Highline Schools are incorrectly noted as the only service provider within SeaTac. However Kent-Mountainview Academy (off Military Rd) is located within the SeaTac city limits and is part of the Kent School District. Please correct this table in the Final EIS.
LJ15-20	4.14-2	In sections 4.14.3.1 and 4.14.3.2 it is noted that the current elevated guideway and this proposed extension through the City of SeaTac could pose a physical challenge for emergency responders following an earthquake. Police, Fire and government services are all located east of the guideway and there is a section of residential and business west of the guideway that requires responders pass beneath the guideway to access the area. Because of the need to await inspection of critical

Response to Comment LJ15-13

The analysis in Section 4.4 addresses the direct impacts associated with the I-5 alternatives, which would cause fewer noise and visual impacts than the SR 99 alternatives. Since the Legislature funded the SR 509 Extension Project in 2015, the Final EIS assumes that project will be built, and Chapter 6 therefore discusses cumulative noise and visual effects from both the FWLE and the SR 509 Extension. In addition, the noise analysis for the Preferred Alternative discusses traffic noise exposure both with and without the SR 509 project. Please see Section 4.7, Noise and Vibration, and Appendix G3, Noise and Vibration Technical Report, for additional information.

Response to Comment LJ15-14

This text was clarified in the Final EIS.

Response to Comment LJ15-15

Section 4.8 is revised in the Final EIS to clarify that Sound Transit met with a City engineer. The staff person who met with Sound Transit as referenced in this section is a City engineer.

Response to Comment LJ15-16

The paragraph has been revised to clarify that it is a WSDOT pond, with plans (last updated in 2003) to be relocated by the SR 509 Extension Project. Now that the SR 509 Extension Project has been funded, WSDOT is evaluating potential changes to the 2003 design.

Response to Comment LJ15-17

WSDOT informed Sound Transit that this pond and downstream pipelines have been recently maintained/repared. The text in Section 4.8.4 has been revised accordingly.

Page 4 (continued)***Response to Comment LJ15-18***

Section 4.13, Electromagnetic Fields, in the Final EIS states that “utility lines are normally insulated and cathodic protection systems are used to prevent corrosion damage from stray currents.”

Response to Comment LJ15-19

Text in Table 4.14-1 in Section 4.14, Public Services, Safety, and Security, has been revised and updated based on the information in the comment.

Response to Comment LJ15-20

Text in Section 4.14, Public Services, Safety, and Security, provides information on the Safety and Security Management Plan (SSMP) that would be prepared as part of the FWLE. The SSMP includes the formation of a Fire/Life Safety Committee that would coordinate with local authorities with jurisdiction, including the cities of SeaTac, Des Moines, Kent, and Federal Way, and the fire and police providers for these cities. The Fire/Life Safety Committee would develop solutions during final design. Section 4.11, Geology and Soils, provides information on the potential seismic hazards and the mitigation measures to avoid potential adverse effects during operation.

As described in Section 4.14, Public Services, Safety, and Security, Sound Transit held two workshops in support of the Preliminary Hazard Analysis to identify safety hazards and their causes, and to agree on design-based solutions. Sound Transit will continue to coordinate with public service providers throughout design, construction, and operation.

FWLE DEIS Comments
Page 5 of 8

LJ15-20		infrastructure before sending responders over or under such structures, that section of SeaTac becomes inaccessible until the infrastructure inspection can be completed. Please describe in the final EIS how this potential impact will be addressed and mitigated.
LJ15-21		Please consider including in the Final EIS a table, listing or similar reference to the existing/applicable emergency response plans of Sound Transit and the local jurisdictions affected by this extension
LJ15-22	4.14-3	At the top of the page, there is a reference to "No hospitals or emergency medical facilities in the study area." The document should address the existence of short and long-term medical rehabilitation facilities such as the one located at S. 224 Pacific Hwy S., which houses hundreds. The information in Table 4.14-2 does not yield meaningful information. More relevant data would address how crime has changed at existing park and rides, when light rail service was implemented such as at the TIB Station. Further, the table shows crime statistics of individual cities, but does not use the same reporting years. Please explain why the data is not listed consistently and why the more accurate analysis was not conducted prior to presenting these conclusions. Please correct the data, analysis and conclusions in the Final EIS.
LJ15-23		
LJ15-24	4.14-4	The information in Table 4.14.3 is not meaningful. More pertinent data would be that of local light rail stations (e.g., TIB and Airport stations). Please explain why the statistics for the Kent/Des Moines Park and Ride (which is in the study area) are not included in the table. Please explain why all of this more accurate/actual data is not included in the DEIS. Please correct the data, analysis and conclusions in the Final EIS. Crimereports.com does not provide accurate crime data. Please explain why this very limited data source (a private business that only gets that information that police departments choose to provide) was used instead of gathering valid and complete crime data from the affected police agencies. Please correct the data, analysis and conclusions in the Final EIS.
LJ15-25		
LJ15-26	4.14-5	The statement in the 3 rd paragraph that all jurisdictions along the project corridor currently operate Emergency Vehicle Preemption (EVP) systems which give emergency vehicles signal priority is not inaccurate. The King County Sheriff's Office provides police services under contract to the City of SeaTac, and not all officer vehicles are equipped with this technology. Please explain in the Final EIS how Sound Transit will work with jurisdictions to ensure proper emergency response times and other related mitigation measures to address these impacts.
	4.14-7	Please clarify the statements in the last paragraph regarding staff at the Link Control Center where video is monitored or accessed. Given the additional responsibilities, it is unclear whether staffing will be increased
LJ15-27		

Response to Comment LJ15-21

A table was not included in the Final EIS because text in Section 4.14, Public Services, Safety, and Security, provides adequate information on the Safety and Security Management Plan (SSMP) that would be prepared as part of the FWLE. Please also see response to comment LJ15-20 above.

Response to Comment LJ15-22

No changes were made because the section only addresses hospitals and emergency medical facilities.

Response to Comment LJ15-23

Table 4.14-2 provides information by jurisdiction and Table 4.14-3 provides information for the transit centers and park-and-rides in the study area. The information is used as part of the affected environment, and Section 4.14.4, Environmental Impacts, provides information on the measures that would be implemented to address crime. The information in Table 4.14-2 has been updated to include the most recent data. Data are not available for all the same years for all of the jurisdictions.

Response to Comment LJ15-24

The data in Table 4.14-3 provide information on the existing conditions for areas where stations would be located, and text in Section 4.14.4 provides information on the potential impacts related to crime and measures that would be incorporated to address crime in the study area. Text has been added to clarify that the information in Table 4.14-3 is related to transit centers and park-and-ride lots associated with FWLE station locations.

Response to Comment LJ15-25

The information has been updated with the latest available information from the Washington Association of Sheriffs and Police Chiefs and data from Crimereports. Crimereports data provide consistent coverage for

Page 5 (continued)

the park-and-ride facilities in the study area and adequate information needed for the analysis. As part of the FWLE Threat and Vulnerability Assessment for the Preferred Alternative, Sound Transit held a workshop to discuss the policies and procedures in place to reduce the system risk from activities that would damage the system, its facilities, or its patrons. This included an in-depth look at the crime reports in the station areas and coordination with local law enforcement. Sound Transit will continue to coordinate with public service providers throughout design, construction, and operation.

Response to Comment LJ15-26

This text is addressing the fire and emergency medical service providers and not police services. Because all of the FWLE alternatives would be grade-separated at crossings, police vehicles should not experience any increase in response times. Also see response to comment LJ15-25.

Response to Comment LJ15-27

Sound Transit would implement these measures, and any additional staffing required at the Link Control Center would be addressed by Sound Transit. Sound Transit provides video evidence to local police for use in criminal investigations.

LJ15-27		as would seem essential for effective monitoring and collection of video evidence for local police who are investigating crime. Please clarify this information, analysis and conclusions in the Final EIS.
LJ15-28		Reference is also made to Sound Transit security personnel, but no reference to estimated staffing levels. Please describe the anticipated level of security staff to be provided at each future station. Please clarify this information, analysis and conclusions in the Final EIS.
LJ15-29	4.14-9	The I-5 Alternative alignment could cause a potential access problem for police and fire into the neighborhood currently accessed via S. 208 th St. from International Blvd., if there were to be damage from an earthquake. Please address the impacts of the FWLE and the SR 509 extension to this area and identify potential mitigation measures in the Final EIS.
LJ15-30	4.17 Parkland, Open Space	4.17-3 The City owns a triangular parcel between International Blvd. and 28 th Ave. S. (APN 344500-0135). Some of the potential light rail alignments indicate this parcel could be impacted. Please identify mitigation measures to address these impacts in the Final EIS.
LJ15-31		The City also owns a parcel on the east side of 32 nd Ave. S. at its southern terminus, adjacent to I-5 (APN 508300-0070). This could be impacted by an I-5 FWLE alignment. A deed restriction stipulates that the City "covenants to operate and maintain the site in perpetuity as a public open space or as a public recreational facility except that the City may trade the site or part of the site for property of equal or better recreational or open space value." If this property is needed for an I-5 alignment, specific mitigation will be necessary. A more complete analysis of impacts and mitigation measures needs to be addressed in the Final EIS.
LJ15-32	6.0 Cumulative Impacts	6-10 The text incorrectly notes that SR 509 "is not in any current transportation plans". SR 509 is in the PSRC 2040 Transportation Corridors list. See: http://www.psrc.org/assets/2935/T2040_Corridors_MapProjectLists.pdf . The Final EIS should contain the most accurate information at time of publishing.
LJ15-33		6-10 Please correct the reference to the Puget Sound Gateway Project, in the Final EIS noting that it includes SR 167, SR 509 and I-5.
LJ15-34		6-11 At the bottom of page, revise the Final EIS to read: "Sound Transit would need to coordinate with WSDOT and the City of SeaTac on potential"
LJ15-35		6-12 Please clarify in the Final EIS whether the proposed light rail guideway location within I-5 corridor affects the ability of I-5 to be widened for additional lanes, and include any mitigation measures needed to address this potential impact.
LJ15-36		6-15 The first phase of SR 509 included in the Puget Sound Gateway Project does not create the necessary link for south access to the airport. In the interim, 28 th /24 th acts as south access. Please correct this statement in the Final EIS.

Response to Comment LJ15-28

Security staff are not assigned to individual stations but roam between stations. All alternatives will have similar staffing levels.

Response to Comment LJ15-29

If the Preferred Alternative were built before the SR 509 Extension Project, access via S 208th Street would be maintained. S 208th Street would be realigned as part of the SR 509 Extension as described in Chapter 6, Cumulative Impacts. Sound Transit will continue to coordinate with WSDOT and the City of SeaTac regarding the design of this realignment.

Response to Comment LJ15-30

Section 4.1, Acquisitions, Displacements, and Relocations identifies the process for property acquisition. This property is zoned for commercial use, is not a park, and does not require any special mitigation. The City would receive fair market value for this property if it were needed for the project.

Response to Comment LJ15-31

Although this parcel has deed restrictions, it is currently fenced off, is not currently used as a park or open space, and is not in the City's Comprehensive Plan as an open space or park resource. Therefore, this land is not considered a park in the Final EIS. Sound Transit would coordinate with the City to find replacement property of equivalent size and function per the deed restrictions if the property is acquired.

Response to Comment LJ15-32

The text should have said the SR 509 Extension Project is not in any current "funded" transportation plans. Since publication of the Draft EIS, this project has received state funding and is now included as a No Build project. This is described in Section 2.6 of the Final EIS.

Page 6 (continued)***Response to Comment LJ15-33***

Section 6.5 of the Final EIS notes that WSDOT is currently revising the extent and design of the Puget Sound Gateway Program.

Response to Comment LJ15-34

The text has been revised per this comment (please see Final EIS Section 6.5.1).

Response to Comment LJ15-35

The design of the Preferred Alternative accommodates the design of the SR 509 Extension Project that was included in the 2003 Record of Decision, which includes widening of the I-5 mainline. This project is the only WSDOT project in the FWLE area that would widen I-5. The relationship of the Preferred Alternative with the SR 509 Extension Project, including improvements on I-5, is discussed in Section 2.6 and in Chapter 3 of the Final EIS.

Response to Comment LJ15-36

WSDOT is currently evaluating modifying the design of the SR 509 Extension that was analyzed in the 2003 Final EIS and approved in FHWA's 2003 Record of Decision. Potential modifications include phasing options. FHWA will decide whether to approve any revisions to the 2003 design that was the subject of FHWA's Record of Decision. FHWA advised Sound Transit that because the potential redesign is in development, the FWLE project should evaluate SR 509 as it was approved in 2003.

LJ15-37		6-16	Please analyze and describe in the Final EIS the impact on pedestrian and bike usage in station areas, where a more densely developed urban environment is anticipated. Please include any potential mitigation measures needed to address these impacts.
LJ15-38		6-17	At the top of the page, please articulate more fully in the Final EIS the visual impacts that will remain after construction and the mitigations measures to address those impacts.
	APPENDICES	PAGE	COMMENT
LJ15-39	D4.3 Economics	D4.3-1	Table 4.3-1 reflects that one parcel would be impacted by a full take with the SR 99, 216 th East Station Alternative; however, Table 4.3-4 on page 4.3-8 indicates that there would be no full takes within the City. Please address and correct this discrepancy in the Final EIS.
LJ15-40	D4.8 Water Resources	D4.8-1	The Title for SeaTac Municipal Code 12.10 is "Surface and Stormwater Management", not Surface Water Utility. Please make this correction in the Final EIS.
LJ15-41		D4.8-1	Table 4.8.1 incorrectly lists Des Moines Creek as having "Boating" and "Navigation" water uses. Please make this correction in the Final EIS.
LJ15-42		D4.8-8	The second sentence in paragraph four should more fully identify where the light rail's collected stormwater will be discharged (i.e. municipal stormwater systems). Please make this correction in the Final EIS.
LJ15-43	G1 Transportation Technical Report	3-19	Revise Table 3-12 in the Final EIS to correctly identify the intersection of SR99 and S 216 th St. is in the City of Des Moines' jurisdiction.
LJ15-44		3-26	Please explain the rationale and basis for selecting a quarter-mile radius threshold for the parking analysis. Based on SeaTac's experience with the Airport Station and TIB Station, the analysis should be at least a one-half mile radius. Please correct the analysis and conclusions in the Final EIS, including any impacts to be addressed and mitigation measures necessary.
LJ15-45		4-12	Please clarify whether completion of ST's East Link was factored into the travel time projections in 4.2.3.2 Please correct the analysis and conclusions accordingly in the Final EIS.
LJ15-46		4-32	Please clarify in the Final EIS how the parking capacity referred to in section 4.3.1.3 compare to the parking being provided by ST at the Angle Lake Station.
LJ15-47		4-68	Please clarify the location of, or explain the absence of a clear zone summary table similar to Table 4-37. Please clarify in the Final EIS who is responsible for widening the roadway to accommodate any necessary clear zone requirements for the SR 99 median option.
LJ15-48		4-69	Please clarify in the Final EIS how the proposed functional/channelization/operations revisions on SR 99 are coordinated with WSDOT for approval.
LJ15-49		4-75	Please clarify in the Final EIS how the loss of onsite parking changes the land use potential for the impacted properties. Also, please identify the existing streets that are impacted by the potential hide and ride uses. Please provide an analysis of current on-street parking utilization and availability in the Final EIS

Response to Comment LJ15-37

Chapter 6 describes the cumulative impacts of the FWLE when combined with other projects. No cumulative impacts on non-motorized users were identified.

Response to Comment LJ15-38

This chapter is for the cumulative impacts of the FWLE when combined with other projects. Section 4.5, Visual and Aesthetic Resources, discussed the impacts associated with the FWLE and proposed mitigation.

Response to Comment LJ15-39

Table 4.3-4 presents data for each alternative with a range of impacts with options in parentheses. It shows that there would be 0 full acquisitions for the alternative and a range of 0-1 full acquisitions with options, including the S 216th East Station Option. Both tables referenced are correct.

Response to Comment LJ15-40

This title has been revised.

Response to Comment LJ15-41

Most uses for the creeks were included in this table since per WAC 173-201, creeks that do not appear in the WAC's Table 602 are to be protected for the designated uses indicated. However, it should be recognized some uses on the smaller creeks such as boating and navigation are infeasible.

Response to Comment LJ15-42

A sentence has been added to clarify that stormwater would continue to flow into the same municipal stormwater systems.

Response to Comment LJ15-43

This has been updated in the Final EIS.

Page 7 (continued)***Response to Comment LJ15-44***

The parking analysis assumed a 1/4-mile radius because the potential for hide-and-ride would be greatest within the closest areas. The FWLE would include additional parking at multiple stations to provide transit riders options for accessing the light rail system; currently, riders in south King County only have the Airport Station and TIB Station.

Response to Comment LJ15-45

The East Link project was factored in the projections provided in Section 4.2.3.2.

Response to Comment LJ15-46

The analysis of corridor-wide parking supply for the Final EIS includes parking provided at the Angle Lake Station.

Response to Comment LJ15-47

The table referenced in the comment was specifically for the I-5 clear zone as defined in the WSDOT highway design manual. Any widening of roadways within the local jurisdictions would adhere to the relevant design standards.

Response to Comment LJ15-48

Design approvals for roadway revisions would be coordinated with the appropriate jurisdictions and would occur in final design and permitting.

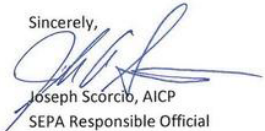
Response to Comment LJ15-49

Sound Transit considers parking lost when determining how much of a property would be acquired for the project. If the amount of parking lost would make the existing business no longer viable, Sound Transit would relocate the business and might acquire the entire property. If the property remaining after construction could be used for another business, Sound Transit might surplus the property. Please see Section 3.5.5 of the Final EIS for a discussion of hide-and-ride parking.

LJ15-50		4-79	Please provide a more complete explanation in the Final EIS for how the parking demand is forecasted. Please clarify this information, analysis and conclusions in the Final EIS.
LJ15-51		4-84	Please explain more fully why the walkshed threshold is a half-mile, whereas the parking analysis is only a quarter-mile (see related comment above). Please correct the analysis and conclusions in the Final EIS, including any impacts to be addressed and mitigation measures necessary.

If you have any questions or need more information regarding our comments, please let Assistant City Manager Gwen Voelpel or me know. The City reserves its rights to comment further on the responses provided to this comment letter and in the Final EIS. Thanks for your thoughtful consideration.

Sincerely,



Joseph Scorcio, AICP
SEPA Responsible Official
Community and Economic Development Director

Cc: SeaTac City Council
Todd Cutts, City Manager
Gwen Voelpel, Assistant City Manager
Steve Pilcher, AICP, Planning Manager

Response to Comment LJ15-50

The parking analysis methodology is provided in Appendix A of the Transportation Technical Report (Appendix G1 of the EIS). Section 4.5.2 of Appendix G1 has been updated to describe the parking analysis methodology.

Response to Comment LJ15-51

Individuals who will walk to the station are generally willing to walk farther than those individuals who drive to a location to park and then walk to the station. The parking analysis focuses on this latter case, specifically considering "hide-and-ride" vehicles, whose drivers try to park relatively close to a station.

Letter FW606

South King Fire & Rescue

Page 1

From: [Goodsell, Gordon](#)
To: [FWLE](#)
Cc: [Baumlee, Ed](#); [Bennett, Paul](#)
Subject: South King Fire & Rescue - Comment on FWLE EIS
Date: Tuesday, May 26, 2015 3:57:12 PM

To: Sound Transit

From: Gordon Goodsell
Assistant Fire Marshal
South King Fire & Rescue
253.946.7241
gordon.goodsell@southkingfire.org

Re: Federal Way Link Extension EIS

Please accept the following comment submitted on behalf of South King Fire & Rescue:

South King Fire & Rescue provides services in the cities of Federal Way, Des Moines and parts of unincorporated King County. These services include emergency responses to fire, medical, rescue, marine and hazardous material incidents. South King Fire & Rescue also provides prevention services including fire and life safety plan review, code enforcement, fire investigation and public education.

South King Fire & Rescue is interested in studying the impact the proposed light rail extension will have on our service delivery. A needs assessment is required to assess the risks presented by the construction of the project, its operation once complete, and our ability to respond to an emergency involving the system. Emergency access to the rail, as well as the local and regional resources available to respond with properly trained and equipped personnel are basic elements to consider.

Response to Comment LJ17-1

Section 4.14, Public Services, Safety, and Security, and Section 5.2.15 of Chapter 5, Construction, of the Final EIS describe potential impacts on emergency response times and Sound Transit's coordination with local emergency service providers for operation and construction. Sound Transit has been coordinating with South King Fire and Rescue through the development of the EIS and preliminary engineering and will continue to coordinate through final design. As part of the project, Sound Transit will prepare a safety and security management plan (SSMP), which will organize the FWLE needs for integrating safety and security into the design, construction, and operation. One of the requirements of the SSMP is the formation of a Fire/Life Safety Committee, which would develop solutions regarding access to the light rail system, emergency routes, training costs, and other design features.