



# ***Tacoma Dome Link Extension***

**Draft** Environmental Impact Statement

## DRAFT EIS SUPPORT INFORMATION

### Appendix A

# List of Supporting Information

A.1 LIST OF PREPARERS .....A-1

A.2 DISTRIBUTION LIST .....A-8

A.3 ACRONYMS AND GLOSSARY .....A-11

A.4 REFERENCES .....A-27

## A.1 LIST OF PREPARERS

### Sound Transit

Tim Bates, Senior Land Use Planner

B.A. Geography (2006)

Master of City Planning (2011)

Paul Bennett, South Corridor Design Manager (retired)

B.S. Civil Engineering (1977)

M.S. Civil Engineering (1990)

M.S. Environmental Engineering (1998)

Elma Borbe, Environmental Planner, EIS Lead

B.A. Community, Environment, and Planning (1987)

M.U.P. Master of Urban Planning (1992)

Sue Comis, South Corridor Transit Development Manager (retired)

B.A. Psychology (1975)

M.U.P. Master of Urban Planning (1980)

Erin Green, South Corridor Environmental Manager, EIS Lead

B.A. Environmental Policy and Planning (2009)

Curvie Hawkins, High Capacity Transit Project Director

B.S. Economics (1995)

Master of City and Regional Planning (2000)

Dezerae Hayes, Tribal Relations Director

Associate of Arts (2006)

B.A. Clinical Psychology (2008)

M.A. Public Administration (2010)

M.A. Tribal Planning (2012)

Ph.D. (2022)

Steve Kennedy, South Corridor Environmental Manager (retired)

B.A. Urban Studies (1972)

M.U.P. Urban Planning (1978)

Chelsey Levy, Deputy Executive Director, Capital Project Development

B.A. Sociology/ Anthropology (2002)

M.U.P. Master of Urban Planning (2008)

M.A. Master of Public Administration (2008)

Daniel Maggioncalda, High Capacity Project Manager

M.P.A. Environmental Policy (2022)

B.A. International Studies (2014)

Bien Mai, Transportation Safety and Security Manager

B.A. Mechanical Engineering (2003)

## **Sound Transit (continued)**

Denis Martynowych, Senior Sustainability Planner and Designer (retired)  
B.S. Biology (1978)  
M. Arch. (1985)

Brooke O'Neill, Senior Environmental Permitting Specialist  
B.S. Environmental Horticulture and Urban Forestry (2004)

Susan Penoyar, Environmental Manager  
B.S. Civil Engineering (1983)  
M.S. Civil Engineering (1984)

Sagar Ramachandra, Community Engagement Specialist,  
B.A. Political Science (2012)  
M.P.A. Master of Public Administration (2015)

Jennifer Schreck, Senior Cultural Resources Specialist  
B.S. Art (1997)  
M.S. Historic Preservation (2000)

Alexander Edward Stevenson, Cultural Resources Program Manager  
B.A. Anthropology with concentration in Archaeology (2003)  
M.S. Anthropology (2011)

Valerie Valero, Senior Civil Engineer  
B.S. Civil Engineering (2012)  
B.S. Architectural Engineering (2012)  
M.S. Civil Engineering (2014)  
Professional Engineer TX (2017)  
Professional Engineer WA (2021)

Teresa Vanderburg, Senior Environmental Permitting Specialist  
B.S. Biology (1984)  
M.S. Environmental Science and Policy (1988)

Diane Wiatr, High Capacity Transit Development Manager  
B.A. Latin American and Environmental Studies (1984)  
M.U.R.P: Transportation and Historic Preservation (2003)

Gary Yao, Senior Current Planner  
B.S. Public Policy, Management, and Planning (2011)

## **HDR**

Kathryn O'Brien, Project Manager  
B.S. Speech Communications (1988)  
M.S. Urban Planning (1995)

Molly Larson, Lead Engineer  
B.S. Civil Engineering (2007)  
P.E. Washington



## **HDR (continued)**

Ed Herald, Lead Engineer (retired)  
B.S. Civil Engineering (1984)  
P.E. California

Mark Peterson, Project Engineer  
B.S. Civil Engineering (2007)  
M.S. Civil Engineering (2012)  
P.E. Washington

Charline Fox, CADD/Project Engineer  
A.A.S. Drafting (1998)

Eleanor Smith, GIS Mapping  
B.S. Environmental Sciences (2017)

Keith Lay, Air Quality and Greenhouse Gas Emissions  
B.S. Civil Engineering (1998)

## **Parametrix**

John Perlic, Project Manager  
B.S. Civil Engineering (1983)  
M.S. Civil Engineering (1989)  
P.E. Washington

Daryl Wendle, Project Advisor  
B.A. English (1986)  
M.A. English (1988)

Jill Czarnecki, Environmental Lead and Project Manager  
B.S. Geology (1997)  
Certificate in Technical Writing and Editing (2001)

Savannah Moore, Environmental Support  
B.A. Psychology (2014)

Ryan LeProwse, Transportation  
B.S. Civil Engineering (1999)

Erinn Ellig, Transportation  
B.A. Geography (2011)  
M.U.P. Urban Planning (2013)

Alicia McIntire, Transportation  
B.A. Urban and Regional Planning (1996)

Daniel Harris, Transportation  
B.A. Linguistics, Psychology (2010)  
M.C.R.P City and Regional Planning (2014)

Josh Ahmann, Acquisitions, Displacements, and Relocations, GIS  
B.S. Geography (2003)  
M.U.R.P. Urban and Regional Planning (2008)

**Parametrix (continued)**

Erin Ferguson, Land Use, Social Resources, Community Facilities, and Neighborhoods,  
Environmental Justice, Parks and Recreational Resources, and Section 4(f)

B.A. Politics and International Relations (2004)

Juris Doctorate (2007)

Jens Swenson, Visual and Aesthetic Resources

B.L.A. Landscape Architecture (1989)

PLA Washington

Mike Hall, Ecosystem Resources

B.A. Music History (1990)

Anna Hoenig, Ecosystem Resources

B.A. Biology (2007)

M.S. Ecology and Evolutionary Biology (2010)

Tad Schwager, Ecosystem Resources

Josh Wozniak, Ecosystem Resources

B.A. Biology (1991)

M.S. Molecular Biology (1993)

Julie Brandt, Water Resources

B.S. Civil Engineering (1997)

P.E. Washington and Oregon

Lindsay Cotnoir, Water Resources

B.S. Environmental Science (2016)

M.S.C.E. Environmental Engineering (2022)

Arianna Frender, Water Resources

B.A. Political Science (2004)

M.S. Civil and Environmental Engineering - Hydrology and Hydrodynamics (2019)

Adam Romey, Hazardous Materials, Geology and Soils

B.A. Anthropology (1997)

B.S. Geology (2003)

LG, Washington

Kelly Carini, Hazardous Materials, Geology and Soils

B.A. Environmental Studies (2009)

Mike Brady, Hazardous Materials

B.S. Geology – Environmental Geology Concentration (2004)

LG, LHG Washington

Brittany Velo, Utilities

B.S. Civil Engineering (2010)

P.E. Washington

Matt Austin, Utilities

B.A. Civil Engineering (2006)

P.E. Washington

## Parametrix (continued)

Margaret Spence, Energy, Electromagnetic Fields  
B.S. Mathematical Sciences (1988)  
M.S. Applied Statistics-Biometry (1990)

Katheryn Seckel, Public Services, Safety, and Security  
B.A. Urban and Regional Planning (1996)  
Certificate, Wetland Science and Management (2006)

Eddie Montejo, Environmental Justice support  
B.A. Environmental Studies/Minor in Solar and Renewable Energy (2013)  
Master of Urban and Regional Planning (2015)

Chad Tinsley, GIS  
B.A. Geography (2010)  
Master of GIS (2015)

Debbie Fetherston, Publications Supervisor  
Ballard High School (1983)

Susan Swift, Editor  
B.S. Biology (1990)  
Master of Urban and Regional Planning (1999)  
Certificate of Editing, University of Washington (2020)

Jill McLain, Editor  
Green River Community College, Court Reporting (1983)

Patricia Yi, Graphics  
B.F.A., Graphic Design (1996)

## ECONorthwest

Jennifer Cannon, Land Use and Economics  
B.A. Environmental Policy and Planning (2000)  
M.A. Urban and Regional Planning (2010)  
M.P.H. Public Health (2019)  
AICP, GISP

Morgan Shook, Land Use and Economics  
B.S. Molecular Biology (1997)  
M.A. Urban and Regional Planning (2005)  
AICP

Ryan Ulsberger, Land Use and Economics  
B.A. Sustainable Urban Development (2012)  
M.S. Geospatial Technologies (2015)

Taylor Burton, Land Use and Economics  
B.A. Sociology (2018)

Joel Ainsworth, Land Use and Economics  
B.A. Economics (2010)  
M.S. Applied Economics (2014)

## **TwoHundred**

John Barden, Visual and Aesthetic Resources  
B.A. Environmental Design (1988)

Jeff Richards, Visual and Aesthetic Resources  
M.F.A. Sculpture (1990)

Morgan Richards, Visual and Aesthetic Resources  
B.S. Technical Journalism (1987)

## **Cross Spectrum Acoustics Inc.**

Lance Meister, Noise and Vibration  
B.S. Civil Engineering (1994)

Joelle Suits, Noise and Vibration  
B.S. Mechanical Engineering (2011)  
M.S.E. Mechanical Engineering (2013)

Scott Edwards, Noise and Vibration  
B.S.E. Acoustical Engineering and Music (2010)

## **Aqua Terra Cultural Resource Consultants**

Sarah Amell, Archaeological Resources  
B.A. Anthropology and Wet-Site Archaeology (2003)  
M.A. Maritime Archaeology (2006)

Andrew Viloudaki, Archaeological Resources  
B.A. Anthropology (2012)  
M.A. Anthropology/Archaeology (2017)

Edgar Huber, Archaeological Resources  
B.A. Anthropology (1978)  
M.A. Anthropology/Archaeology (1984)  
Ph.D. Anthropology/Archaeology (1993)

Jessica Morris, Archaeological Resources  
B.A. Anthropology (2010)  
M.S. Cultural and Environmental Management/Archaeology (2019)

## **Historical Research Associates, Inc.**

Ron Adams, Archaeologist  
B.A. Anthropology (1995)  
M.A. Archaeology (2001)  
Ph.D. Archaeology (2007)

Chrisanne Beckner, Senior Architectural Historian  
B.A. English (1988)  
M.A. English (1999)  
M.S. Historic Preservation (2009)

## **Historical Research Associates, Inc. (continued)**

Brent Hicks, Principal Archaeologist and Project Manager (retired)

B.A. Anthropology (1986)

B.A. Recreation and Parks Administration (1987)

M.A. Anthropology (1991)

Gabe Frazier, GIS Coordinator

B.A. Anthropology (2005)

Certificate in Geographical Information Systems Sciences and Technologies (2011)

M.S. Geography (2013)

Michele Punke, Project Manager, Senior Archaeologist and Geoarchaeologist

B.A. English/Archaeology (1996)

M.A.I.S. Anthropology/Geosciences (2001)

Ph.D. Physical Geography (2005)

Lauren Waldroop, Architectural Historian

B.S. Environmental Design (2014)

B.S. German (2014)

M.H.P. Historic Preservation (2017)

Matt Warren, Archaeologist

B.A. Anthropology (2009)

B.A. Biology (2009)

M.A. Anthropology (2014)

Ph.D. Anthropology (2019)

## **Envirolssues**

Alayna Linde, Public Engagement

B.A. Chemistry (2010)

M.S. Environmental Studies (2013)

Chris Johnstone, Public Engagement

B.A. Environmental Studies (2015)

## **A.2 DISTRIBUTION LIST**

### **Federal Agencies**

Advisory Council on Historic Preservation  
Bonneville Power Administration  
Federal Aviation Administration, Northwest Mountain Region  
Federal Emergency Management Agency  
Federal Highway Administration, Washington State Division  
Federal Motor Carrier Safety Administration  
Federal Railroad Administration  
Federal Transit Administration  
Maritime Administration  
National Oceanic and Atmospheric Administration (NOAA Fisheries)  
United States Army Corps of Engineers  
United States Bureau of Indian Affairs, Northwest Region  
United States Coast Guard  
United States Department of Homeland Security, Transportation Security Administration  
United States Department of Housing and Urban Development, Region 10  
United States Department of the Interior/National Park Service  
United States Environmental Protection Agency (Region 10)  
United States Fish and Wildlife Service

### **Tribes**

Muckleshoot Indian Tribe  
Nisqually Indian Tribe  
Puyallup Tribe of the Puyallup Reservation  
The Confederated Tribes and Bands of the Yakama Nation

### **State Agencies**

Washington State Department of Archaeology and Historic Preservation  
Washington State Department of Ecology  
Washington State Department of Fish and Wildlife  
Washington State Department of Natural Resources  
Washington State Department of Transportation  
Washington State Recreation and Conservation Office

## **Regional Agencies**

Puget Sound Clean Air Agency  
Puget Sound Regional Council  
South King Fire and Rescue

## **Counties**

King County  
Pierce County

## **Transit Agencies**

King County Metro Transit  
Pierce Transit

## **Local Agencies**

City of Federal Way  
City of Fife  
City of Milton  
City of Tacoma  
Port of Tacoma/Northwest Seaport Alliance

## **Utility Providers**

AT&T  
British Petroleum  
CenturyLink/Lumen  
Click! Network  
Comcast  
Lakehaven Water and Sewer District  
Lightcurve (formerly Rainier Connect)  
Lumen  
McChord Pipeline Company  
Puget Sound Energy  
Zayo

## **Libraries**

Federal Way Regional Public Library

Federal Way 320th Library

Fife Library

Milton/Edgewood Library

Tacoma Public Library Mottet Branch



## A.3 ACRONYMS AND GLOSSARY

### Acronyms and Abbreviations

ACS	American Communities Survey
ADA	Americans with Disabilities Act
ADT	average daily traffic
APE	Area of Potential Effects
APTA	American Public Transportation Association
Belmor	Belmor Mobile Home Park
BIA	Bureau of Indian Affairs
BMP	best management practice
Board	Sound Transit Board
BPA	Bonneville Power Administration
BRT	bus rapid transit
CFR	Code of Federal Regulations
CLOMR	Conditional Letter of Map Revision
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
COVID-19	Coronavirus Disease 2019
cPAH	carcinogenic polyaromatic hydrocarbon
CPP	Countywide Planning Policy
CPTED	crime prevention through environmental design
DAHP	Washington Department of Archaeology and Historic Preservation
dB	decibel
dBA	A-weighted decibel
DMU	diesel multiple unit
Ecology	Washington State Department of Ecology
EIS	environmental impact statement
EMF	electromagnetic field
EMT	emergency medical technician
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Endangered Species Act
FAZ	Forecast Analysis Zone
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
Fife Median	Fife Pacific Highway Median
FMC	Fife Municipal Code
FTA	Federal Transit Administration
FW	Federal Way
FWLE	Federal Way Link Extension
GHG	greenhouse gas

## Acronyms and Abbreviations (continued)

GIS	geographic information system
GMA	Growth Management Act
HCT	high-capacity transit
HHS	United States Department of Health & Human Services
HOV	high-occupancy vehicle
HPA	Hydraulic Project Approval
HSS	highways of statewide significance
HUD	United States Department of Housing and Urban Development
Hz	Hertz
I-5	Interstate 5
I-705	Interstate 705
IEEE	Institute of Electrical and Electronics Engineers
IPPC	Intergovernmental Panel on Climate Change
ISO	International Organization for Standardization
kV	kilovolt
LWCF	Land and Water Conservation Fund
Ldn	day-night sound level
LEED	Leadership in Energy and Environmental Design
Leq	equivalent sound level
Lmax	maximum sound level
Ln	percentile sound level
LOMR	Letter of Map Revision
L.O.S.	level of service
LRT	light rail transit
LUST	leaking underground storage tank
LWCF	Land and Water Conservation Fund
Metro	King County Metro
MMPA	Marine Mammal Protection Act
MOA	memorandum of agreement
M.O.S.	minimum operable segment
MOVES	Motor Vehicle Emission Simulator
MSAT	Mobile Source Air Toxics
MSDS	Material Data Safety Sheets
MTCO <sub>2e</sub>	metric ton of carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NPDES	National Pollutant Discharge Elimination System
NPGIS	nonpollution-generating impervious surfaces
NRHP	Nation Register of Historic Places
O <sub>3</sub>	ozone
OFM	Washington State Office of Financial Management

## Acronyms and Abbreviations (continued)

OHW	ordinary high water mark
OMF	operations and maintenance facility
OMF South	Operations and Maintenance Facility South
PAH	polycyclic aromatic hydrocarbon
PCB	polychlorinated biphenyl
PGIS	pollution-generating impervious surfaces
PM <sub>10</sub>	particulate matter less than 10 micrometers
PM <sub>2.5</sub>	particulate matter less than 2.5 micrometers
PSCAA	Puget Sound Clean Air Agency
PSE	Puget Sound Energy
PSRC	Puget Sound Regional Council
Puyallup Tribe of Indians	Puyallup Tribe of the Puyallup Reservation
RCW	Revised Code of Washington
RCO	Washington State Recreation and Conservation Office
RMS	root square mean
ROD	Record of Decision
RTP	Regional Transportation Plan
SEPA	State Environmental Policy Act
SF	South Federal Way
SHPO	State Historic Preservation Officer
Sound Transit	Central Puget Sound Regional Transit Authority
SR	State Route
St.	Saint
SWMMWW	Stormwater Management Manual for Western Washington
Tacoma Power	Tacoma Public Utilities-Power
TCP	traditional cultural property
TD	Tacoma Dome
TDLE	Tacoma Dome Link Extension
THPO	Tribal Historic Preservation Officer
TOD	transit oriented development
TPSS	traction power substation
USACE	United States Army Corps of Engineers
USC	United States Code
U.S. DOT	United States Department of Transportation
USFWS	United States Fish and Wildlife Service
v/c	volume-to-capacity
VCP	Voluntary Cleanup Program
VdB	vibration decibels
VHD	vehicle hours delay
VHT	vehicle hours traveled
VMT	vehicle miles traveled
VOC	volatile organic compound
WAC	Washington Administrative Code

**Acronyms and Abbreviations (continued)**

WDFW	Washington State Department of Fish and Wildlife
WHR	Washington Heritage Register
WRIA	Water Resource Inventory Area
WSDOT	Washington State Department of Transportation
Yakama Nation	Confederated Tribes and Bands of the Yakama Nation

## Glossary of Terms

**Air pollutant.** Smoke, dust, fumes, or odors in the ambient air that have the potential for harmful effects.

**Alignment.** Horizontal geometric elements that define the location of the light rail track or roadway.

**Archaeological sensitivity zone.** An area where the potential for finding an archaeological resource is high. See **high probability areas**.

**Aquatic resource.** The physical elements of the aquatic environment, such as streams, rivers, lakes, and shorelands, as well as life forms such as aquatic plants and fish that live within the aquatic environment.

**Aquifer.** An underground layer of water-bearing permeable rock or unconsolidated materials (gravel, sand, or silt) from which groundwater can be extracted using a water well.

**Arterial.** A major thoroughfare used mainly for through traffic rather than access to adjacent property. Arterials generally have greater traffic-carrying capacity than collector or local streets and are designed for continuously moving traffic.

**Artifact.** Any portable object used and/or modified by civilization (particularly during prehistoric times).

**At-grade profile.** Where the light rail track is at the same grade (ground level) as the surrounding terrain.

**Attainment area.** An attainment area is an area considered to have air quality as good as or better than the national ambient air quality standards for specific pollutants as defined in the Clean Air Act.

**A-weighted sound level (dBA).** The A-weighted sound level has been widely adopted by acousticians as the most appropriate descriptor for environmental noise. The noise measurement program monitored A-weighted sound levels, expressed in dBA (see Decibel).

**Ballast.** Gravel or coarse stone used to form the bed of a railroad track or road.

**Best management practices (BMPs).** Approved physical, structural, and/or managerial practices that, when used singularly or in combination, prevent or reduce pollutant discharges.

**Buffer.** An area adjacent to a critical area (e.g., wetland or stream) that functions to avoid loss or decline in ecological functions and values. In addition to preserving the ecological functions of a wetland system, a buffer physically isolates a critical area from potential disturbance and harmful intrusion, and works to minimize risk to the public from loss of life, well-being, or property damage.

**Capacity, person.** The maximum number of persons that can be carried past a given location during a given time period under specified operating conditions without unreasonable delay, hazard, or restriction. Usually measured in terms of persons per hour.

**Capital costs.** Nonrecurring costs required to construct transit systems, including costs of right-of-way, facilities, rolling stock, power distribution, and the associated administrative and design costs, as well as financing charges during construction.

## Glossary of Terms (continued)

**Carbon monoxide (CO).** A colorless, odorless, tasteless gas, and one of the United States Environmental Protection Agency's criteria air pollutants released from automobile exhaust.

**Census tract.** A census tract is a small subdivision of an urban area used by the United States Census Bureau to identify population and housing statistics. Census blocks are subdivisions of census tracts and are the smallest unit of census geography for which the Census Bureau collects data. The boundaries of census blocks are generally streets or other notable physical features and often correspond to a city block. A census block group is a combination of census blocks, typically encompassing two to four city blocks.

The United States Census collects some information at the block level, some at the block group level, and some at the tract level.

**Concentration (also, level).** A measure of the air pollutant in the ambient air, having the units of mass per volume.

**Conformity (air quality).** A process that ensures federal funding and approval goes to transportation activities consistent with federal air quality goals. The Federal Highway Administration and the Federal Transit Administration jointly determine that specific regions meet air quality standards.

**Construction staging area.** During construction, a site temporarily used for materials or equipment storage, assembly, or other temporary, construction-related activities.

**Criteria air pollutants.** Those air pollutants that have been recognized by the United States Environmental Protection Agency as potentially harmful and for which standards have been set to protect the public health and welfare. The criteria air pollutants are carbon monoxide, sulfur dioxide, particulates, nitrogen dioxide, ozone, hydrocarbons, and lead.

**Day-night sound level (Ldn).** The day-night sound level (Ldn) is the noise descriptor commonly used for assessing the noise impact of rail projects at residential land uses. Ldn is a 24-hour cumulative A-weighted noise level that includes all noises that occur during a day, with a 10-dB penalty for nighttime noise (10 p.m. to 7 a.m.). This weights Ldn toward nighttime noise because most people are more easily annoyed by noise during the nighttime hours when background noise is lower and most people are sleeping.

**dBA.** The sound level obtained through the use of A-weighting characteristics specified by the American National Standards Institute (ANSI) Standard S1.4-1971. The unit of measure is the decibel (dB), commonly referred to as dBA when A-weighting is used. The "A" weighting scale closely resembles human response to noise.

**de minimis impacts.** Section 4(f) *de minimis* impacts cannot "adversely affect the activities, features, and attributes" of a Section 4(f) resource. For public parks or recreation properties, a *de minimis* impact finding requires written concurrence from the agency with jurisdiction over the property. For historic and archaeological sites, a *de minimis* impact is allowed if the Federal Transit Administration (FTA) has determined "no adverse effect" in compliance with Section 106 of the National Historic Preservation Act of 1966. When FTA has made a *de minimis* determination, the project is not required to analyze avoidance alternatives for that Section 4(f) property.

**Decibel (dB).** The unit used to measure the loudness of noise.

## Glossary of Terms (continued)

**Dewatering.** The temporary removal of ground or surface water from a construction area to allow construction to be done under dry conditions.

**Displacement.** A property acquisition that would require removing an existing use.

**Elevated mainline.** A mainline that is positioned above the normal activity level (e.g., elevated structure for light rail to cross over a street).

**Emission.** Particulate, gaseous, noise, or electromagnetic byproducts of the transit system or vehicle.

**Endangered species.** According to the Endangered Species Act of 1973, an endangered species is any species in danger of extinction throughout all or a significant portion of its range, other than an insect determined by the Secretary of the Interior to constitute a pest whose protection under the provisions of this act would present an overwhelming and overriding risk to man.

**Equivalent level (Leq).** Leq is a measure of sound energy over a period of time. It is referred to as the equivalent sound level because it is equivalent to the level of a steady sound which, over a referenced duration and location, has the same A-weighted sound (dBA) energy as the fluctuating sound.

**Forest habitat.** In the Puget Sound lowlands, a habitat type generally dominated by Douglas-fir, western red cedar, and western hemlock, frequently with a hardwood understory. The ground cover is generally lush. Birds and small mammals abound, and larger mammals are common in large stands.

**Full acquisition.** The full parcel would be acquired, and the current use would be displaced. Full acquisitions include parcels that might not be fully needed for the project but would be affected to the extent that current uses would be substantially impaired (e.g., loss of parking or access).

**Glacial till.** This type of soil typically consists of a diverse mix of gravelly sand with scattered cobbles and boulders in a clay/silt matrix. It is very dense and is locally referred to as “hardpan.” The predominant glacial till encountered in the project area is Vashon-age glacial till.

**Grade separated.** Parallel or crossing lines of traffic that are vertically or horizontally physically separated from each other and do not share a common intersection.

**Greenhouse gas (GHG).** Greenhouse gases include carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), ozone (O<sub>3</sub>), water vapor, nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). These gas emissions are collectively leading to the greenhouse effect, trapping the sun’s solar rays and leading to an increase in Earth temperature.

**Groundborne noise.** Noise that is transmitted through the ground, typically reported in decibels.

**Groundborne vibration.** A small but rapidly fluctuating motion transmitted through the ground, typically reported as velocity or acceleration.

## Glossary of Terms (continued)

**Habitat function.** Terrestrial plant communities, wetlands, and aquatic systems such as streams that provide a variety of functions in the environment. For instance, depending on the condition and location of a wetland, wetland functions might include water quality improvement, groundwater recharge, nutrient and sediment filtering, and habitat for a variety of animals, as well as education and recreation opportunities for people — the habitat function is one of several functions potentially performed by wetlands. Similarly, terrestrial and aquatic systems each also may perform many functions. When they provide habitat for animals, they are said to be performing or providing a “habitat function.”

**Habitat value.** The value of a plant community’s function as determined by the habitat’s ability to support the needs of biological species. High-value habitats are those that support or may support threatened, endangered, and/or sensitive species as determined by federal, state, and local jurisdictions.

**Hazardous materials.** Hazardous materials are materials that, because of their chemical, physical, or biological nature, pose a potential risk to life, health, or property when released. Such materials include hazardous waste, dangerous waste, hazardous substances, and toxic substances.

**Headway.** The headway between vehicles in public transit systems is the amount of time (usually in minutes) that elapses between two vehicles passing the same point traveling in the same direction on a given route.

**High-capacity transit (HCT).** A system of public transportation services within an urbanized region operating principally on exclusive rights-of-way; examples include light rail transit or express buses on exclusive bus ways and their supporting services.

**High probability areas.** Areas that have moderate, high, or very high probability of containing archaeological materials according to Washington State Department of Archaeology and Historic Preservation’s predictive model.

**Hours of service.** The number of hours during the day between the start and end of service on a transit route, also known as the service span.

**Indirect impacts.** Impacts (i.e., effects) caused by the proposed action or alternative and occur later in time or are farther removed in distance but still reasonably foreseeable. Indirect impacts may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems (Code of Federal Regulations Title 40 Section 1508.1(g)(2)).

**Interim terminus.** A station where the project would operate until the next portion of the project can be built. The terminus would typically include a station with tail tracks extending beyond the station for layover of trains.

**Lead Track.** A track connecting a railroad yard or facility with a mainline track.

**Leq.** The equivalent steady-state sound level that, in a specified time period, would contain the same acoustic energy as the varying sound level during the same period; considers volume capacity, travel speeds, and delay.

**Leq(h).** The hourly value of Leq.



## Glossary of Terms (continued)

**Level of service (L.O.S.).** A qualitative measure that represents the collective factors of travel under a particular volume condition. A measure of traffic congestion.

**Light rail transit (also light rail).** A mode of mass transportation comprising light rail vehicles that travel on steel tracks and are powered by electricity from overhead wires. This mode is characterized by its ability to operate in at-grade and/or grade-separated environments.

**Link.** Sound Transit's light rail system.

**Low-income.** A low-income person is a person whose median household income is at or below two times the federal Health and Human Services poverty guidelines. For 2020, two times the Department of Health and Human Services 2020 poverty guideline for a household of one was \$25,520 annual income and for a household of four was \$52,400 annual income in the 48 contiguous states.

**Mainline.** Track that is used for light rail vehicles or is the principal artery of a system to which other components (such as operation and maintenance facilities) are connected (see Elevated Mainline).

**Maintenance area.** Maintenance areas are geographic areas with a history of nonattainment of National Ambient Air Quality Standards (NAAQS) but that now consistently meet NAAQS.

**Megawatt (MW).** 1,000,000 watts.

**Minimum operable segment (M.O.S.).** The M.O.S. is defined by the Federal Transit Authority as "a segment of the Locally Preferred Alternative that provides the most cost-effective solution with the greatest benefits for the project. The M.O.S. must be able to function as a stand-alone project and not be dependent on any future segments being constructed" (FTA 2008).

**Minority.** A person who is:

- Black – A person having origins in any of the black racial groups of Africa;
- Hispanic or Latino – A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race;
- Asian – A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent;
- American Indian or Alaskan Native – A person having origins in any of the original people of North or South America, including Central America, and who maintains cultural identification through tribal affiliation or community recognition; or
- Native Hawaiian or Other Pacific Islander – A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

**Minority population.** Any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by the project.

**Mobility.** The ease of continuous movement along the transportation system.

**Mode.** A particular form or method of travel, such as pedestrian, bicycle, automobile, bus, or light rail.

## Glossary of Terms (continued)

**Model Toxics Control Act (MTCA).** The Model Toxics Control Act Cleanup Regulation, Washington Administrative Code 173-340, implements the Model Toxics Control Act, Revised Code of Washington 70.105D, which addresses strict requirements for site discovery and reporting, site assessments, and site remediation. Most important, the regulation defines standard methods used to assess whether a site is contaminated or clean.

**National Ambient Air Quality Standards (NAAQS).** Federal limits on levels of atmospheric contamination necessary to protect the public from adverse effects on health (primary standards) and welfare (secondary standards).

**National Historic Preservation Act of 1966 (NHPA).** The Act that established the National Register of Historic Places and State Historic Preservation program and set forth guidelines and regulations for environmental review of projects involving federal funding.

**National Register of Historic Places (NRHP).** The official list of the nation's cultural resources determined to be worthy of preservation; the register is maintained by the National Park Service.

**Network.** A system of real or hypothetical interconnecting links that forms the configuration of transit routes and stops comprising the total system.

**No-Build Alternative.** The No-Build Alternative includes the transportation system and environment as they would exist without the proposed project.

**Nonattainment area.** An area designated by the United States Environmental Protection Agency as currently violating the National Ambient Air Quality Standards, based on archival air quality data.

**Nonmotorized Transportation.** Also known as Active Transportation, this primarily refers walking, bicycling and wheelchair travel, but also includes other small-wheeled modes of transportation like scooters and skates. Nonmotorized facilities are the infrastructure nonmotorized travelers use to get around, including sidewalks, bike lanes, and shared-use paths.

**NO<sub>x</sub>.** Oxides of nitrogen (nitrogen oxide and nitrogen dioxide). The pollutants released during high-temperature combustion of fossil fuels such as diesel.

**Off-peak.** Those periods of the day when demand for transit service is not at a maximum.

**Operating costs.** Recurring costs incurred in operating transit systems, including wages and salaries, maintenance of facilities and equipment, fuel, supplies, employee benefits, insurance, taxes, and other administrative costs. Amortization of facilities and equipment is not included.

**Operating revenue.** The gross income from operation of the transit system, including fares, charter income, concessions, advertising, etc. Does not include interest from securities, nonrecurring income from sale of capital assets, etc.

**Operational energy.** The energy used for vehicle propulsion, facilities, and maintenance for a specified period, usually 1 year.

**Overhead catenary system.** Electrical transmission poles and lines that supply power to the light rail system.

## Glossary of Terms (continued)

**Parking utilization.** The number of parking spaces being utilized at a given location; it is calculated as the total number of parking spaces occupied divided by the total parking supply at a given location.

**Partial acquisition.** Part of a parcel would be acquired, but the current use generally would not be displaced. In some instances, such as larger parcels that hold multiple uses, a business or residential unit on a parcel could be displaced, but most uses would remain.

**Particulate matter.** A mixture of extremely small particles and liquid droplets that is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The United States Environmental Protection Agency is concerned about particles that are 10 micrometers in diameter or smaller because those are the particles that generally pass through the throat and nose and enter the lungs.

**Peak hour.** The hour of the day in which the maximum demand for service is experienced, accommodating the largest number of automobile or transit patrons.

**Peak period.** A time period or periods when travel activity is at its heaviest.

**Pedestrian level of service.** An overall measure of walking conditions on a route, path, or facility.

**Pollution-generating impervious surface (PGIS).** Impervious surfaces considered to be a significant source of pollutants in stormwater runoff. Such surfaces include those subject to vehicular use, industrial activities (as defined in Washington State Department of Ecology's Stormwater Management Manual), or storage of erodible or leachable materials, wastes, or chemicals, and which receive direct rainfall or the run-on or blow-in of rainfall.

**Preferred alternative.** Following publication of the Draft Environmental Impact Statement (EIS), the Sound Transit Board identifies a preferred alternative, including route and station options. The Final EIS will further evaluate the preferred alternative as well as other alternatives. A preferred alternative is not an action or decision within the meaning of Washington Administrative Code 197-11-070.

**Profile.** The vertical position of the track in relation to surrounding terrain. Light rail profile types are at-grade, elevated, trench, retained fill, and tunnel.

**Queue.** A line of vehicles, bicycles, or persons waiting to be served by the system in which the flow rate from the front of the queue determines the average speed within the queue. Slowly moving vehicles or people joining the rear of the queue are usually considered part of the queue. The internal queue dynamics can involve starts and stops. A faster-moving line of vehicles is often referred to as a moving queue or a platoon.

**Recreation and Conservation Office.** The Washington State Recreation and Conservation Office is a state agency that manages grant programs to create outdoor recreation opportunities, protect the state's wildlife habitat and working farms and forests, and help return salmon from near extinction. The office supports the Recreation and Conservation Funding Board, Salmon Recovery Funding Board, Invasive Species Council, Governor's Salmon Recovery Office, and Habitat and Recreation Lands Coordinating Group.

**Reliability.** How often transit service is provided as promised; affects waiting time, consistency of passenger arrivals from day to day, total trip time, and loading levels.

## Glossary of Terms (continued)

**Retained fill profile.** Where the trackway is built above the ground surface on fill with a retaining wall on one side or both sides.

**Right-of-way.** The corridor (horizontal and vertical space) owned by the transit agency for the transportation way.

**Riparian habitat.** A habitat type associated with stream or river margins and characterized by dense vegetation consisting primarily of willow, alder, and cottonwood species, supporting a wide variety of waterfowl, songbirds, amphibians, and small mammals.

**Route.** The course followed by a transit vehicle as a part of the transit system.

**Runoff.** The rainwater that directly leaves an area in surface drainage, as opposed to the amount that seeps out as groundwater.

**Screenline.** A screenline is an imaginary line across a section of freeways or arterials. Screenlines are often used in traffic analyses to determine how much volume is entering or exiting a particular area.

**Section 106.** Section 106 of the National Historic Preservation Act of 1966 established a procedure to review the potential effects on cultural resources by projects that involve a federal action.

**Section 4(f).** Section 4(f) of the U.S. Department of Transportation Act restricts the United States Department of Transportation's approval of projects affecting the following properties: publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge, or any land from a significant historic site.

**Section 401.** Section 401 of the Clean Water Act is a certification program administered by the Washington Department of Ecology under guidelines of the United States Environmental Protection Agency to ensure projects applying for a Section 404 permit comply with state water quality standards and other requirements of the state law.

**Section 404.** Section 404 of the Clean Water Act is a permit program administered by the United States Army Corps of Engineers under guidelines by the United States Environmental Protection Agency to protect the nation's waters from dredged and fill sources.

**Section 6(f).** Section 6(f) of the Land and Water Conservation Act of 1965 established restrictions on, and replacement requirements for, the use of land acquired with funds authorized under the Land and Water Conservation Fund Act.

**Sensitive receptor (auditory).** A local area or site that supports activities easily disrupted by audio intrusions or distractions, such as a school, historic landmark, or residential neighborhood.

**Sensitive view.** A view that is identified by local jurisdictions as requiring protection.

**Sensitive viewers.** Viewers for which the landscape contributes to their enjoyment of their activity and aesthetic of their living environment. Park users or residents are more sensitive to change in the landscape than office workers or motorists.

## Glossary of Terms (continued)

**Service frequency.** The number of transit units (vehicles or trains) on a given route or line that are moving in the same direction and pass a given point within a specified interval of time, usually 1 hour.

**Social interaction.** Intra-neighborhood communication and circulation using street, sidewalk, and bikeway connections between residential areas and community facilities, retail businesses, and employment centers. Also includes verbal interaction and telecommunications facilities.

**Sound Transit 2 and Sound Transit 3.** Packages of high-capacity transit investments in the regional transit system. Sound Transit 2 was adopted in July 2008. Sound Transit 3 was approved by Washington voters in November 2016.

**Sound Transit District.** Sound Transit's taxing district includes the most populated areas of King, Pierce, and Snohomish counties. The district generally follows the urban growth boundaries created by each county. For a district map see <http://www.soundtransit.org/About-Sound-Transit/Taxing-district>.

**Sound wall.** A barrier designed to protect residents or other sensitive receivers from high noise levels generated nearby, such as from a highway or light rail line.

**Sounder.** Sound Transit's commuter rail system, which travels from Lakewood to Everett, through Seattle.

**Staging area.** Section of land near a construction site designated for equipment and truck storage, maintenance, and warm-up prior to engagement in construction activities.

**Stormwater.** Stormwater is rain and snow melt that runs off surfaces such as rooftops, paved streets, highways, and parking lots. As water runs off these surfaces, it can pick up pollution.

**Stormwater detention.** The temporary storage of stormwater runoff and subsequent release at a slower rate.

**Stormwater treatment.** Stormwater ponds and underground vaults are used to remove sediments and dissolved metals from stormwater. They collect sediments on the bottom of the pond or vault, where maintenance workers can clean them out on a regular basis.

**Straddle bent.** Light rail guideway support that extends across the width of the street.

**Subduction zone.** An area where one crustal plate is descending below another. The Puget Sound area is close to a subduction zone, which is formed by the Juan de Fuca plate descending below the North American plate. This action can cause significant seismic activity.

**Sustainability Plan.** Sound Transit's *Sustainability Plan* gives an overview of the agency's efforts in reducing energy use, greenhouse gases, and air pollution. Sound Transit has developed nine sustainability priorities to guide its long-term achievements. They focus on expanding transit services and ridership, improving stations and facilities, and deploying the most fuel-efficient, clean, and cost-effective vehicles.

**Terminus.** A transit station located at the end of a transit line.

**Threatened species.** According to the Endangered Species Act of 1973, any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

## Glossary of Terms (continued)

**Total travel time.** The total elapsed time between trip beginning and end, including travel, terminal, and waiting time.

**Traction power substation.** Electrical station that provides the power needed to drive the trains. The substations are housed in either standalone structures, or within transit stations, typically within or adjacent to the right-of-way.

**Transfer time.** The elapsed trip time required to change between modes (e.g., bus to light rail) or to transfer between routes of the same mode (e.g., bus to bus).

**Transfer.** The portion of a trip between two connecting transit lines, both of which are used for completion of the trip.

**Transit.** A transportation system principally for moving people in an urban area and made available to the public usually through paying a fare.

**Transit center.** A station with shelters where a large number of transit vehicles and passengers can be brought together with safety and convenience.

**Transit oriented development (TOD).** Transit oriented development emphasizes high-quality walking environments, mixed land uses, and high-density developments linked to transit. TOD creates a pattern of dense, diverse, pedestrian-friendly land uses near transit nodes that support higher transit patronage. “Equitable” transit-oriented development is development that enables all people, regardless of income, race, ethnicity, age, gender, immigration status or ability, to experience the benefits of dense, mixed-use, pedestrian-oriented development near transit hubs.

**Travel time (in vehicle).** The time required to travel between two points, not including terminal or waiting time.

**Trip.** The one-way movement of one person between the origin and the destination, including transfers, and the walk distance to and from the means of transportation.

**Unity.** In visual analysis, the visual coherence and compositional harmony of the landscape.

**Use of Section 4(f) property.** The use of Section 4(f) property, which includes publicly owned parks and recreation areas that are open to the public, publicly owned wildlife and waterfowl refuges, and historic sites of national, state, or local significance, is generally defined as a transportation activity that permanently or temporarily acquires land from a Section 4(f) property or that substantially impairs the important activities, features, or attributes that qualify the property as a Section 4(f) resource.

**Vegetation clear zone.** The area extending 11 feet beyond the light rail guideway footprint where tall shrubs and trees are not allowed to grow in order to protect the light rail overhead catenary system lines and tracks.

**Vehicle hours traveled (VHT).** The total vehicle hours expended traveling on the roadway network in a specified area during a specified time period.

**Vehicle mile.** An amount of travel equivalent to one vehicle traveling one mile.

**Vehicle miles traveled (VMT).** The total number of vehicle miles traveled within a specific geographic area over a given period of time.



## Glossary of Terms (continued)

**Vehicle occupancy.** The number of persons per vehicle. Usually an average number for a specified trip type, area, and analysis year.

**Vibration propagation.** The transfer of vibration through soil or other media.

**Vibration propagation test.** A test that provides an estimate of vibration levels as a function of distance from a vibration source, in this case the light rail vehicle. Tests are done on the surface to evaluate propagation at-grade, or at the bottom of a bore hole for tunnel routes.

**Vibration velocity.** Vibration velocity is the basic measure of groundborne vibration. It is a measure of the rate at which particles in the ground are oscillating relative to the equilibrium point.

**Viewer sensitivity.** Refers to how viewers perceive the environment and what they find important. It can be affected by what the viewer is doing; the visual context; and the values, expectations, and interests of the viewer. Viewer sensitivity to the viewed environment is classified as low, average, or high.

**View.** A scene observed from a given vantage point.

**Viewshed.** An area of land, water, or other environmental element that is visible to the human eye from a fixed vantage point.

**Visual amenity.** An object or element (such as buildings or vegetation) that enhances the visual character of a view or area.

**Visual character.** Refers to identifiable visual information, including visual elements and major environmental features.

**Visual quality.** Refers to the evaluation of the visual experience to the public and is described in terms of vividness, intactness, and unity. *Vividness* refers to the way landscape components combine in distinctive and memorable visual patterns. *Intactness* refers to whether the natural and human-built visual patterns form a consistent landscape, or whether highly contrasting features intrude into the view. *Unity* refers to the visual coherence and compositional harmony of the landscape considered as a whole. Visual quality is an assessment of the visual character and is categorized as low, medium, or high, as follows:

**Low visual quality.** Views that lack a dominant visual character in which there is a low level of fit between disparate elements. In some cases, these views appear disorganized, with features that seem out of place, or are views with some compositional harmony but include eyesore elements that can dominate one's perception.

**Medium visual quality.** Views with a unity or compositional harmony between elements of the landscape that produce a pleasing overall impression in which encroaching elements are minor and do not substantially alter the perception of the landscape as a unit. These views lack vivid, memorable features and are generally characterized as common or ordinary.

**High visual quality.** Views with vivid, memorable, distinctive features in a landscape with compositional harmony or that fit between elements of the landscape that is free from encroaching elements.

## **Glossary of Terms (continued)**

**Washington State Department of Ecology 303(d) List.** The federal Clean Water Act, adopted in 1972, requires states to restore their waters to be “fishable and swimmable.” The Clean Water Act established a process to identify and clean up polluted waters. Every 2 years, all states are required to prepare a list of water bodies that do not meet water quality standards. This list is called the 303(d) list because the process is described in Section 303(d) of the Clean Water Act.



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# ***Tacoma Dome Link Extension***

**Draft** Environmental Impact Statement

## PUBLIC INVOLVEMENT AND TRIBAL AND AGENCY COORDINATION

### Appendix B

## Appendix B. Public Involvement and Tribal and Agency Coordination

The National Environmental Policy Act (NEPA) and Washington State Environmental Policy Act (SEPA) recognize the important role of public outreach and engagement throughout the environmental review process. Sound Transit is committed to engaging with Tribes, agencies, and the public throughout the planning, construction, and operation of the Tacoma Dome Link Extension (TDLE) and began to do so in the early phases of the project. Sound Transit has engaged with Tribes, neighborhood and community stakeholders, local transit partners, and city, county, state, and federal agencies in a variety of ways to inform and involve these groups in the project.

### 1 Outreach Goals and Objectives

TDLE is a part of the mass transit system expansion by Sound Transit, funded by the Sound Transit 3 initiative that voters approved funding for in 2016. It would provide approximately 10 miles of additional light rail service to the existing light rail network and will serve residents of Pierce and South King counties.

Public involvement and Tribal and agency coordination in the planning and environmental phases of the project play an important and ongoing role in developing station and route alternatives, identifying the preferred alternatives, conducting environmental review, and evaluating design refinements.

Throughout alternatives development and environmental review Sound Transit is committed to:

- **Engaging audiences and communities** most affected by the project and having conversations through a variety of communications channels.
- **Transparent**, inclusive, and accessible engagement and timely responses to questions.
- **Encouraging awareness of project benefits**, effects, and progress by sharing information and opportunities to get involved throughout the project.
- **Accountability to the public** by asking communities for feedback and being clear when and how it was used to make project decisions.
- **Accessibility to project information** with easy-to-read, understandable, and in-language materials, and engagement opportunities accessible to the communities where they are held.

Sound Transit has engaged a variety of audiences:

- **Agencies**, including agencies with jurisdiction or special expertise with respect to environmental issues.
- **Tribes**, including Tribal members, Tribal property owners, and government-to-government consultation with Tribes.
- **Neighborhood and community stakeholders**, including advocacy groups, businesses, communities of color, community-based organizations and cultural groups, current and future transit riders, immigrant and refugee populations, limited English-speaking populations, low-income households, people with disabilities, local residents (renters and homeowners), and social service organizations.

- **General public**, including people who live, work and commute in, through and around the Puget Sound region.
- **Property owners**, including homeowners, condominium owners, apartment complex owners and their tenants and staff, small and minority-owned businesses, and commercial property owners and their tenants.
- **Print, digital, and broadcast media**, including community, local, and ethnic media sources.

## **2 Chartered Group Engagement**

Three chartered groups played important roles in the alternatives development process. A Stakeholder Group, an Elected Leadership Group, and an Interagency Group met in 2018 and 2019 and provided input and recommendations on alternatives. See Table B8-1 in Section B.8 of this appendix for a complete list of Stakeholder Group, Elected Leadership Group, and Interagency Group meetings.

The Stakeholder Group was comprised of community members, including residents, transit riders, business-owners and representatives of business and community organizations.

- The group provided a way for community members to inform the development of alternatives for the project. Members were able to highlight issues, consider trade-offs along the route, and make recommendations to the Elected Leadership Group on alternatives to study during environmental review and on preferred alternatives.
- The group was comprised of 25 to 30 community members across various interest areas. Members were identified by Sound Transit and jurisdictional partner staff and through a formal public application process in 2018. Membership was confirmed by the Elected Leadership Group.
- The group met six times over the course of 15 months in 2018 and 2019.

The Elected Leadership Group was comprised of the mayors of cities along the project corridor (Federal Way, Fife, Milton, Tacoma), a Puyallup Tribe Councilmember, King and Pierce County Executives, Sound Transit Board Members, and a Washington State Department of Transportation representative.

- The Elected Leadership Group served as a steering committee to make recommendations to the Sound Transit Board on alternatives and preferred alternatives to study during the Environmental Impact Statement (EIS) development. Other responsibilities included appointing community members to the Stakeholder Group, discussing corridor-specific issues and trade-offs, considering public and stakeholder group feedback, and contributing towards community consensus. Each jurisdiction along the service corridor was represented.
- The Elected Leadership Group met nine times over the course of 18 months in 2018 and 2019, ultimately providing a recommendation for a preferred alternative in the South Federal Way Segment and Tacoma Segment to the Sound Transit Board of Directors in mid-2019. A preferred alternative for the Fife Segment was not identified at that time. After the Elected Leadership Group made its recommendations on preferred alternatives in 2019, the group's purpose was achieved.

The Interagency Group consists of staff-level representatives from agencies and governments in the corridor, including the Puyallup Tribe of Indians; they convene on a near-monthly

schedule to work through technical coordination, preview alternatives, and review technical analysis under development. Their work was integrated with the Stakeholder Group and Elected Leadership Group in the lead-up to the identification of a preferred alternative. This group continues to meet in order to maintain understanding of the project's progress and advise on project development.

### 3 Station Area Workshops

The Stakeholder, Elected Leadership, and Interagency groups were supplemented by two series of Station Area Workshops in 2018. Sound Transit hosted station-specific workshops, inviting stakeholder organizations and local agency staff to gather input from the local communities on alternatives from each station area.

- Station Area Workshops were held in jurisdictions with planned stations, including South Federal Way, Fife, and Tacoma. Attendees included representatives from the Stakeholder, Interagency and Elected Leadership Groups, community and cultural organizations, Washington State Department of Transportation (WSDOT), local businesses and city staff.
- Workshops focused on gathering feedback from attendees on multimodal and transit connections at each station, station access, and station location to inform the design of each station.

The Station Area Workshops were another opportunity during alternatives development to gather input and feedback from communities that would be most impacted by the project.

### 4 Tribal Coordination and Consultation

TDLE would include construction and development of a light rail facility across ancestral and reservation lands of the Puyallup Tribe of Indians and may affect the Tribe's court-adjudicated treaty rights. In addition, Sound Transit and the Federal Transit Administration (FTA) have identified other Tribes that are likely to have interest in the project. As the lead agency with a federal trust responsibility, FTA is leading Tribal consultation with support from Sound Transit, which would continue throughout the project. FTA is consulting with four federally recognized Tribes for the TDLE project:

- Puyallup Tribe of Indians.
- Confederated Tribes and Bands of the Yakama Nation (Yakama Nation).
- Muckleshoot Indian Tribe.
- Nisqually Indian Tribe.

Government-to-government consultation with these Tribes was initiated through consultation letters sent by FTA in February 2018, followed by a formal invitation to participate in Scoping and the initiation of Section 106 consultation in April 2019. Through the consultation process, the Tribes have the opportunity to develop information, share environmental analyses, and review and provide comments on Section 106 and the Draft EIS prior to formal issuance.

During the environmental review process, FTA has engaged interested Tribes regarding potential cultural resources, as required under Section 106 of the National Historic Preservation Act. Additionally, the Puyallup Tribe of Indians is invited to participate in monthly meetings with

the City of Fife and the City of Tacoma, as well as meetings of the Elected Leadership Group, Interagency Group, and Stakeholder Group. Table B4-1 lists additional Tribal meetings that have occurred during the Draft EIS development.

**Table B4-1 List of Tribal Meetings**

Meetings	Date
Tribal Council meetings where FTA and Sound Transit provided a briefing	2/20/2019, 8/11/2022, 11/16/2023
Meetings with Puyallup Tribe of Indians' Staff	<b>2018:</b> 3/30/2018, 5/1/2018, 5/3/2018, 6/13/2018, 6/29/2018, 8/23/2018, 10/1/2018 <b>2019:</b> 2/7/2019, 4/17/2019, 8/14/2019, 9/25/2019, 11/22/2019 <b>2020:</b> 1/10/2020, 2/10/2020, 3/3/2020, 10/28/2020, 10/29/2020, 11/3/2020, 11/6/2020 <b>2021:</b> 4/5/2021, 9/13/2021, 10/7/2021, 10/19/2021 <b>2022:</b> 5/4/2022, 6/3/2022, 6/8/2022, 6/30/2022 <b>2023:</b> 4/20/2023, 4/24/2023, 5/10/2023, 6/6/2023, 7/18/2023 <b>2024:</b> 2/9/2024, 2/14/2024, 3/13/2024, 4/10/2024, 4/16/2024, 4/26/2024, 5/8/2024, 5/9/2024, 5/22/2024, 6/12/2024, 7/24/2024, 8/5/2024, 8/14/2024
Meetings with individual Tribal landowners potentially impacted by alignments	9/6/2018, 12/9/2020, 6/24/2022, 7/14/2022 (2)

## 5 Agency Coordination

The FTA and Sound Transit developed a Coordination Plan in accordance with 23 United States Code (U.S.C.) §139(g)(1) and following FTA policy with the objective of identifying key coordination points with Tribes, agencies, and the public during the environmental review process for TDLE. FTA is the lead federal agency under NEPA, and Sound Transit is the lead agency under SEPA. The Coordination Plan is also used by Sound Transit to fulfill applicable SEPA coordination requirements. The purpose of this Coordination Plan is to support the Tribes, cooperating agencies, and participating agencies as they engage in the identification, analysis, and evaluation of TDLE alternatives throughout alternatives development and environmental review processes. This plan identifies key coordination points and activities for Tribes, agencies, and the public, and it reviews the major steps in the NEPA and SEPA environmental review process.

As required by 23 U.S.C. §139(d)(8)(A), to the maximum extent practicable and consistent federal law, all federal permits and reviews shall rely on the EIS prepared for this project.

At the beginning of the environmental review process, FTA and Sound Transit invited agencies to participate as described below.

### 5.1 Cooperating Agencies

Cooperating agencies, per NEPA (40 CFR 1501.6 and 40 CFR 1508.5), are agencies with jurisdiction or special expertise with respect to environmental issues that should be addressed in the EIS. Cooperating agencies take part in developing information, preparing environmental analyses, providing staff support to enhance the lead agency's interdisciplinary capability, and providing information for the Draft EIS development.

Cooperating agencies are also expected to use the environmental process and documentation to address environmental issues of concern to the agency. Table B5-1 identifies the agencies FTA and Sound Transit invited to be cooperating agencies, why they are identified as such, and their response to the invitation.

**Table B5-1 Invited Cooperating Agencies and Permits and Approvals<sup>1</sup>**

Cooperating Agencies	Role	Permits and Approvals (if applicable)	Response to Invitation <sup>2</sup>
<b>Federal</b>			
Bonneville Power Administration (BPA)	Agency with jurisdiction	<ul style="list-style-type: none"> <li>Approval related to crossing BPA powerlines</li> </ul>	Declined
Federal Highway Administration, Washington State Division	Agency with jurisdiction, property owner, special expertise on highways	<ul style="list-style-type: none"> <li>Airspace Lease and other interstate modification or use approvals</li> <li>Operations and Maintenance Agreement</li> <li>ROD or other NEPA environmental determination</li> </ul>	Accepted
U.S. Army Corps of Engineers	Agency with jurisdiction	<ul style="list-style-type: none"> <li>Clean Water Act, Sections 401 and 404</li> <li>Rivers and Harbors Act, Section 10 and Section 14, Section 408 Permission (33 U.S.C. §§401 and 408)</li> </ul>	No Response
U.S. Bureau of Indian Affairs, Northwest Region	Agency with special expertise on Native American interests	<ul style="list-style-type: none"> <li>Recordings of potential long-term leases on Tribal lands.</li> </ul>	Accepted
<b>State</b>			
Washington State Department of Transportation	Agency with jurisdiction, property owner, special expertise on highways	<ul style="list-style-type: none"> <li>Airspace Lease: State Transportation Routes</li> <li>Temporary Construction Airspace Lease</li> <li>Construction Oversight Agreement</li> <li>Design Documentation Package</li> <li>General Permits</li> <li>Access Revision Report</li> <li>Survey Permits</li> </ul>	Accepted
<b>Regional</b>			
King County (Department of Natural Resource and Parks, Department of Development and Environmental Services)	Agency with jurisdiction, special expertise on the county facilities and operations	<ul style="list-style-type: none"> <li>None identified at this time</li> </ul>	No Response, King County Metro accepted as Participating Agency
Pierce County	Agency with jurisdiction, special expertise on the county facilities and operations	<ul style="list-style-type: none"> <li>Land Use Permit</li> <li>Shoreline Application, including Joint Aquatic Resource Permit Application, EIS Checklist</li> <li>Road Use Permit</li> </ul>	No Response

**Table B5-1 Invited Cooperating Agencies and Permits and Approvals  
(continued)**

Cooperating Agencies	Role	Permits and Approvals (if applicable)	Response to Invitation <sup>2</sup>
<b>Local</b>			
City of Federal Way	Agency with jurisdiction, property owner, special expertise on the city facilities and operations	<ul style="list-style-type: none"> <li>• Master Land Use Permit</li> <li>• Environmentally Critical Areas Approval, including floodplain management</li> <li>• Shoreline Management Substantial Development, Conditional Use, or Variance Permit</li> <li>• Right-of-Way Permit</li> </ul>	Accepted
City of Fife	Agency with jurisdiction, property owner, special expertise on the city facilities and operations	<ul style="list-style-type: none"> <li>• Master Land Use Permit, including Critical Areas (floodplain management) and Shoreline permits</li> <li>• Work in City Right-of-Way Permit</li> </ul>	Accepted
City of Milton	Agency with jurisdiction, property owner, special expertise on the city facilities and operations	<ul style="list-style-type: none"> <li>• Master Land Use Permit</li> <li>• Street Work Permit</li> <li>• Shoreline Permit, including floodplain management</li> </ul>	Accepted
City of Tacoma	Agency with jurisdiction, property owner, special expertise on the city facilities and operations	<ul style="list-style-type: none"> <li>• Land Use Permit</li> <li>• Critical Areas and Shoreline Permit, including floodplain management</li> <li>• Road Use Permit</li> </ul>	Accepted

Notes:

(1) Government-to-government consultation has been initiated with four federally recognized Tribes: Puyallup Tribe of Indians, Confederated Tribes and Bands of the Yakama Nation, Muckleshoot Indian Tribe, and Nisqually Indian Tribe.

(2) Response to Cooperating Agency invitations as of May 30, 2019.

## 5.2 Participating Agencies

Participating agencies, per NEPA (23 U.S.C. § 139), are identified by the lead agency and include federal and non-federal agencies that may have an interest in the project but are not a lead or cooperating agency. Additionally, in implementing SEPA, appropriate agencies must be consulted in the EIS process as required by WAC 197-11-502.

Participating agencies are responsible for providing comments, responses, studies, or methodologies on those areas within the special expertise or jurisdiction of the agency. Participating agencies are also expected to use the environmental process and documentation to address environmental issues of concern to the agency and support future permit and approval efforts. Table B5-2 identifies the agencies FTA and Sound Transit have invited to be participating agencies, why they are identified as such, and their response to the invitation. The Yakama Nation, Muckleshoot Indian Tribe, and Nisqually Indian Tribe were invited to participate in the environmental review process. No responses were received from the Tribes.



**Table B5-2 Invited Participating Agencies with Permits, Approvals, or Potential Interest in the Project**

Participating Agencies	Role	Permits, Approvals, or Potential Interest	Response to Invitation <sup>1</sup>
<b>Federal</b>			
Advisory Council on Historic Preservation	Special expertise on historic resources	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	Declined
Federal Aviation Administration, Northwest Mountain Region	Agency with jurisdiction	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	No Response
Federal Motor Carrier Safety Administration	Special expertise on vehicle safety	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	No Response
Federal Railroad Administration	Special expertise on railroads	<ul style="list-style-type: none"> <li>Necessary permits and approvals to be identified in coordination with the Federal Railroad Administration</li> </ul>	Accepted
Maritime Administration	Special expertise on maritime transportation	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	No Response
National Oceanic and Atmospheric Administration Fisheries, West Coast Region	Agency with jurisdiction, special expertise on marine biological resources	<ul style="list-style-type: none"> <li>Endangered Species Act Review, Section 7 Consultation</li> <li>Magnuson-Stevens Act Consultation</li> </ul>	No Response
U.S. Coast Guard <sup>2</sup>	Agency with jurisdiction, special expertise on navigable waterways	<ul style="list-style-type: none"> <li>Advance Approval Determination for bridge permitting process</li> </ul>	Declined
U.S. Environmental Protection Agency, Region 10	Special expertise on multiple environmental resources	<ul style="list-style-type: none"> <li>Necessary permits and approvals to be identified in coordination with the U.S. Environmental Protection Agency</li> </ul>	Accepted
U.S. Federal Emergency Management Agency, Region 10	Special expertise on regulated floodplains	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	No Response
U.S. Department of Homeland Security, Transportation Security Administration	Special expertise on security	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	No Response
U.S. Department of Housing and Urban Development, Region 10	Special expertise on affordable housing	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	No Response
U.S. Department of the Interior, Office of Environmental Policy and Compliance, Pacific Northwest Region (National Park Service)	Agency with jurisdiction	<ul style="list-style-type: none"> <li>Section 106 of the National Historic Preservation Act (36 CFR Part 800)</li> <li>Section 4(f) of the U.S. Department of Transportation Act of 1966</li> </ul>	No Response
U.S. Fish and Wildlife Service	Special expertise on fish and wildlife (Endangered Species Act consultation)	<ul style="list-style-type: none"> <li>Endangered Species Act Review, Section 7 Consultation</li> </ul>	No Response



**Table B5-2 Invited Participating Agencies with Permits, Approvals, or Potential Interest in the Project (continued)**

Participating Agencies	Role	Permits, Approvals, or Potential Interest	Response to Invitation <sup>1</sup>
<b>Regional</b>			
King County Metro	Special expertise on transit	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	Accepted
Puget Sound Clean Air Agency	Agency with jurisdiction, special expertise on air quality	<ul style="list-style-type: none"> <li>Notice of Construction (Air Quality)</li> </ul>	No Response
Puget Sound Regional Council	Special expertise on regional growth, land use, transportation, economic, and demographic conditions	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	No Response
Pierce Transit	Special expertise on transit	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	Accepted
<b>State</b>			
Washington State Department of Archaeology and Historic Preservation	Special expertise on archaeology and historic resources	<ul style="list-style-type: none"> <li>Section 106 of the National Historic Preservation Act (36 CFR Part 800)</li> <li>Section 4(f) of the U.S. Department of Transportation Act of 1966</li> </ul>	Accepted
Washington State Department of Ecology	Agency with jurisdiction, special expertise on multiple environmental resources (air quality, water quality, contaminated sites)	<ul style="list-style-type: none"> <li>Coastal Zone Management Consistency Certification</li> <li>Clean Water Act Section 402, National Pollutant Discharge Elimination System Stormwater Discharge Permit</li> <li>Clean Water Act Section 401, Water Quality Certification</li> <li>Wastewater Discharge Permit</li> <li>Underground Storage Tank 30-day notice</li> <li>Notice of Construction (Air Quality)</li> </ul>	No Response
Washington Department of Fish and Wildlife	Agency with jurisdiction, special expertise on fish and wildlife	<ul style="list-style-type: none"> <li>Hydraulic Project Approval</li> </ul>	Accepted
Washington Department of Natural Resources	Agency with jurisdiction, special expertise on natural resources	<ul style="list-style-type: none"> <li>Aquatic Lease</li> </ul>	Accepted
Washington State Recreation and Conservation Office	Agency with jurisdiction on certain recreation property with special funding	<ul style="list-style-type: none"> <li>Section 6(f) approvals</li> <li>State funding approvals</li> </ul>	No Response
<b>Local</b>			
Port of Tacoma	Special expertise on freight movement	<ul style="list-style-type: none"> <li>Potential interest</li> </ul>	Accepted

Notes:

(1) Response to Participating Agency invitations as of May 30, 2019.

(2) The U.S. Coast Guard provided a letter (October 1, 2018) to Sound Transit defining the construction of a new bridge as a minor approval due to the limited navigability of the Puyallup River.

### 5.3 Resources Provided by Tribes and Agencies

Tribes and federal, state, and local agencies have provided data collection, resource identification, determination of regulatory compliance requirements, and/or assistance in development of analysis methodologies. Table B5-3 lists what resource information Sound Transit gathered from each agency. Agencies also provided additional information and evaluation throughout the analysis process, which will continue through the completion of the Final EIS.

**Table B5-3 List of Resources Provided by Tribe and Agency**

Tribe/Agency Type	Name	Resources Provided or Consulted On
Tribe	Puyallup Tribe of Indians, Confederated Tribes and Bands of the Yakama Nation, Muckleshoot Indian Tribe, Nisqually Indian Tribe	Cultural resources, fisheries, treaty rights, land use, property easements, and economics
Federal	Federal Railroad Administration	Railroad crossings and safety
Federal	Federal Highway Administration	Traffic; highway improvement plans; utilities
Federal	U.S. Bureau of Indian Affairs	Tribal property
Federal	U.S. Environmental Protection Agency, Region 10	Review of all areas in the NEPA EIS, Environmental Justice
Washington State	Department of Archaeology and Historic Preservation	Archaeological and historic resources
Washington State	Department of Fish and Wildlife	Threatened and endangered species, fish and wildlife, wetlands, priority habitat
Washington State	Department of Natural Resources	Threatened and endangered species (plant/animal), geology and soils
Washington State	Department of Transportation	Traffic; highway improvement plans; utilities
Port	Port of Tacoma	Transportation: Freight operations
County	King County Metro	Transportation: Transit
County	Pierce Transit	Transportation: Transit
Cities	City of Federal Way City of Fife City of Milton City of Tacoma	Land use and economic activity; neighborhoods and population; transportation plans and traffic; archaeological and historic resources; wetlands; water quality; acquisitions, displacements, and relocations; noise and vibration; visual and aesthetic resources; parks and recreational resources; geology and soils; utilities; input on public outreach strategies

As the analysis of alternatives for the Draft EIS was being developed, coordination with regional Tribal partners identified known cultural resources adjacent to I-5 in the South Federal Way Segment, and the potential for additional alignments was identified. Coordination with the City of Fife, Puyallup Tribe of Indians, and other partner agencies identified the need to consider additional station options outside the FEMA floodplain boundary in Fife to meet federal regulations and the floodplain management guidance. In March 2023, the Sound Transit Board identified the need to analyze additional alternatives along the SR 99 (Pacific Highway) corridor as well as additional station options in Fife in the Draft EIS (Motion M2023-19). A preferred alternative for TDLE will be identified prior to the issuance of the Final EIS.

## 6 Outreach Activities and Tools

Beginning in 2018, Sound Transit began agency and public outreach efforts for TDLE. Outreach methods have included online, in-person, existing community engagement efforts, media, and English and translated materials in several languages (Spanish, Korean, Vietnamese, Khmer, and Russian) to ensure continual engagement and availability of information throughout the project. Sound Transit engaged over 1,000 people in-person to share project information and gather feedback throughout Early Scoping, Scoping, and additional outreach efforts.

To ensure widely available and accessible project information, Sound Transit used a variety of communication tools and methods including email updates, a project website, open houses and drop-in sessions, public hearings, fact sheets and brochures, community events, notifications to potentially impacted properties, press releases, and targeted outreach to underrepresented groups. Each of the outreach periods included online open houses supplemented by in-person and online events, ultimately reaching and engaging over 15,200 users. Print, online, and media advertisements and project updates disseminated project information throughout each outreach period. Each of the six outreach periods to date (Early Scoping, September 2018 outreach, NEPA and SEPA Scoping, November 2019 outreach, fall 2020 outreach, and spring 2023 update) included a saturation postcard or newsletter mailing.

### 6.1 GovDelivery Listserv

Individuals interested in receiving project information can sign up to receive periodic project updates through email. Sound Transit maintains a database of individuals who have requested to receive updates on project progress and opportunities for public input using a GovDelivery listserv. The listserv includes email addresses and/or physical addresses of open house attendees, drop-in session attendees, correspondents, commenters, and other interested individuals. In addition to the listserv, Sound Transit also uses a mailing list of over 50,000 addresses in the project area for project related mailings.

### 6.2 Briefings

Sound Transit actively seeks opportunities to provide briefings to community and neighborhood groups, organizations, social service providers, and businesses in the TDLE project area. Local community groups receive project information, learn about opportunities to provide project feedback and how to stay engaged, and ask questions at these briefings. Many briefings are one-on-one meetings with local stakeholders and community leaders. A full list of community briefings can be found in Table B8-1 in Section B.8 of this appendix.

### 6.3 Open Houses and Drop-In Sessions

Sound Transit held open houses and informational drop-in sessions along the project corridor during Early Scoping, Scoping, and additional outreach periods. During Early Scoping in April 2018, outreach in September 2018, and Scoping in April 2019, Sound Transit held large open houses in three different locations along the corridor during each outreach period. The project team shared information about alternatives development, project progress, and proposed route and station alternatives. Members of the public were encouraged to attend to speak with members of the project team, ask questions, and provide comments and feedback. In November 2019, Sound Transit hosted a series of informal drop-in sessions along the project corridor to provide a project update and share information on alternatives development. In March 2023, Sound Transit hosted a series of informal drop-in sessions in Federal Way and Fife to share information on additional alignment alternatives and station options being proposed to be studied in the environmental review process. A full list of open houses and drop-in sessions can be found in Section B.9 of this appendix in Table B9-2.

## 6.4 Public Hearings

Sound Transit will hold public hearings during the 60-day comment period following the release of the Draft EIS. See Section B.7.6, Draft EIS, for more information.

## 6.5 Fact Sheets and Brochures

Sound Transit distributed TDLE fact sheets and brochures to the public throughout the project lifetime. The fact sheets included general project information and timeline, status of alternatives development, information on preferred alternatives and alternatives to be studied in environmental analysis, project contact information, and the project website URL. The project team also developed a fact sheet focused on summarizing potential fieldwork activities and a folio for potentially impacted property owners along the project corridor that provided an overview of what to expect throughout the project lifecycle. Translated versions of these materials are available in Spanish, Korean, Vietnamese, Khmer, and Russian.

## 6.6 Community Events

The TDLE project team attends existing events held by community organizations in the project area to connect with audiences that may not receive project information otherwise. By attending these events, Sound Transit builds relationships and establishes an ongoing presence in communities in the project area, provides project information and answers questions, and offers ways to stay engaged through project email updates. The project team has focused on attending events in traditionally underserved communities, particularly those in the East Tacoma area, and providing in-language project information. See Table B8-2 in Section B.8 of this appendix for a full list of community events.

## 6.7 Project Webpage

Sound Transit maintains a project webpage — [soundtransit.org/tdlink](https://soundtransit.org/tdlink) — for the TDLE project. The website includes a project overview and project maps, information on project stakeholders and partners, news and updates, project timeline and milestones, and a document library of published materials. Project documents on the TDLE website include:

- TDLE Early Scoping Information Report.
- TDLE Early Scoping Report and Appendices.
- TDLE Scoping Information Report.
- TLDE Scoping Summary Report and Appendices.
- TDLE Community Engagement and Communications Plan.
- TDLE Project Folio.

Visitors can also sign up to receive project email updates on the website.

## 6.8 News Media

The TDLE team publishes notifications and press releases for project updates, events, outreach periods and Sound Transit Board meetings in online and print local news publications along the project corridor. See Table B6-1 at the end of this section for a full list of publications.

## 6.9 Notifications to Potentially Affected Properties

Beginning in 2018, the project team has continued to meet with potentially affected property owners who requested briefings throughout the lifetime of the project. Meetings with property owners have focused on providing an overview of the project, discussing potential impacts in further detail, and answering questions. In addition to these meetings, Sound Transit has conducted door-to-door field visits to provide information about the project and distribute project factsheets and brochures. In fall 2019, Sound Transit began reaching out to property owners to coordinate fieldwork efforts for informing designs for route and station alternatives. The project team called property owners, distributed flyers by hand, and conducted door-to-door field visits to notify properties of upcoming fieldwork. In spring 2023, the project team conducted phone calls to businesses and properties that could be potentially impacted by the additional alignment alternatives and station options in South Federal Way, Milton, and Fife. The potentially affected properties were informed of the spring 2023 online open house and drop-in sessions and encouraged to subscribe to the listserv to receive email updates.

Sound Transit mailed individual letters to potentially affected property owners in the project corridor several months prior to publication of this Draft EIS. The letters included details of the property's inclusion in the Draft EIS and an offer to meet with the project team to discuss individual property impacts in person. Sound Transit will continue to communicate transparently with property owners about potential impacts to their property, create and maintain relationships with property owners, and answer questions about the property acquisition and relocation process.

## 6.10 Targeted Outreach

Sound Transit is committed to equitable engagement and inclusive outreach with community groups, organizations, residents, businesses, and underrepresented populations who do not typically participate in traditional in-person and online open houses or engagement opportunities. The project team has conducted targeted outreach to populations with limited English proficiency, low incomes, and historically underrepresented groups to build long-term relationships and provide meaningful opportunities to engage in the project planning, design, and environmental review processes. The project team reached out to community organizations and social service providers, when possible, to learn more about individual community needs and to identify events to attend. Notifications were released in print and online through the publications listed in Table B6-1. Appendix C, Environmental Justice, provides more information on people in the project area with limited English proficiency, people of color, and people with low incomes.

Sound Transit conducted a preliminary demographic analysis to identify low-income, minority, and limited-English-proficiency populations in the project area. Based on this analysis, Sound Transit provided project literature in Spanish, Korean, Vietnamese, Khmer and Russian. Spanish, Cambodian, Korean, and Vietnamese interpreters were available at East Tacoma events, and tactile interpreters were available at the Tacoma open house during Scoping. Additional information on Environmental Justice populations is included in Appendix C.

**Table B6-1 Print and Online Publications**

Publication	Project segment	Media type
Sound Info (Federal Way Mirror)	Federal Way	Print and online
International Examiner (Asian Pacific)	Full project corridor	Print and online
Korea Daily (available in Korean)	Full project corridor	Print and online
The Korea Times Seattle (available in Korean)	Full project corridor	Print and online
Northwest Vietnamese News (available in Vietnamese)	Full project corridor	Print and online
The Seattle Times	Full project corridor	Online
South Sound Biz	Full project corridor	Online
Tacoma News Tribune	East Tacoma and Tacoma Dome	Print and online
Tacoma Weekly News	East Tacoma and Tacoma Dome	Print and online
Tu Decides Weekly Newsletter (available in Spanish)	Full project corridor	Print and online
El Siete Dias (available in Spanish)	Full project corridor	Print and online
Weekly Volcano and NW Military	Full project corridor	Print and online
Russian Town Seattle (available in Russian)	Full project corridor	Online
Poster Giant	Full project corridor	Print
Peach Jar	Full project corridor	Online

The COVID-19 crisis introduced changes to engagement best practices out of necessity for public health and safety, with many in-person methods of outreach shifting to online briefings and meetings during the pandemic. Sound Transit will continue to offer a variety of online and in-person opportunities for people to engage to best meet community needs. Sound Transit engages with social service providers, community leaders and organizations, and other representatives through targeted outreach efforts. Through these efforts, the project team can share project information, build relationships with the community, and explain how environmental justice populations may experience adverse impacts or benefits from the project. Sound Transit is using several types of targeted outreach, including:

- **Briefings:** Sound Transit met with community representatives and organizations to provide a project update, answer questions, and learn more about individual circumstances and better ways to engage with their community. Attention and care have been taken to meet people in locations where they may be more comfortable engaging with government agencies. This has included attending Korean, Spanish, Cambodian, and Vietnamese group gatherings, collaborating with groups for translation services, and serving meals and engaging with community groups. Briefings were adapted to meet the needs of specific audiences, including presentation content, as well as interpretation/translation.
- **Open houses:** Open house locations and times that were accessible for the audiences within the project corridor were used. At open houses, project outreach staff set up tables of materials and resources, answered questions, and participated in facilitated conversations. At TDLE-focused open houses, project staff often presented a brief overview of the project to provide background. Advertised availability for translation, ASL interpretation and tactile interpretation was provided for individuals who requested these services.
- **Fair and festival booths:** Project staff attended fairs, festivals, and community/cultural celebrations in the project area (Federal Way, Fife, Milton, and Tacoma) to distribute project information and answer questions from the general public. Outreach staff hosted Sound Transit booths with project-specific materials and general Sound Transit information, like the System Expansion folio, Sounder train schedules, and ORCA card brochures.

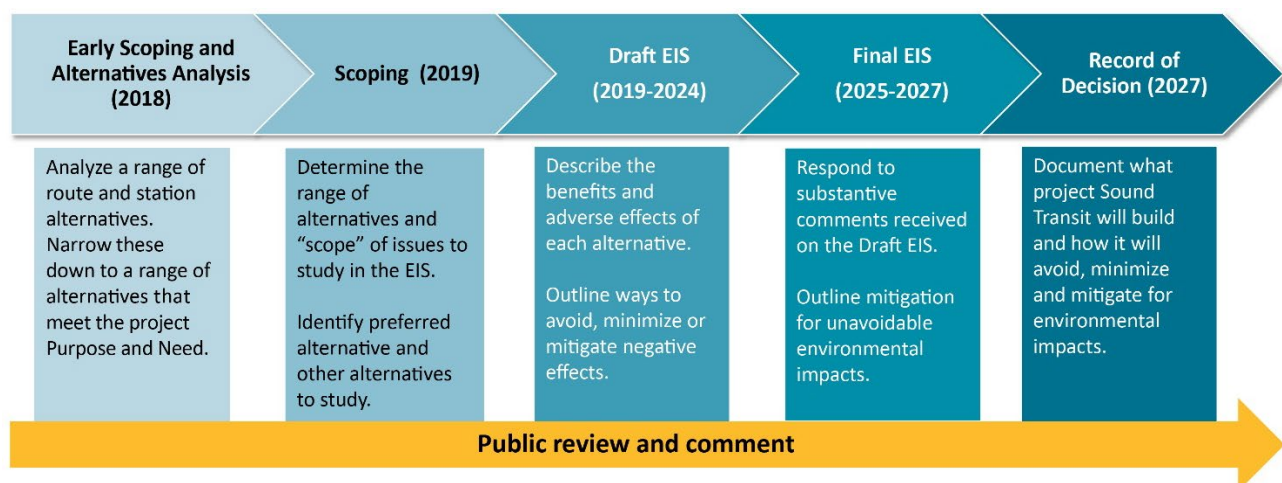


- **Tabling and drop-in sessions:** Project outreach provided project information and updates and answered questions at public spaces and community spaces, including transit centers, UW Tacoma, grocery stores, and community centers to reach a wider audience. These tabling sessions were held on multiple days and at various times (weekdays/weekends, daytime, evening) to meet varying schedules of community members.
- **Listening sessions:** The project staff hosted a listening session in East Tacoma to learn more about the community members' vision for the area, potential barriers to transit access, and to hear feedback on alternatives. Sound Transit provided interpreters in Cambodian, Spanish, and Vietnamese for this event.
- **Stakeholder interviews:** The project team conducted a series of interviews with social service organizations and community advocacy groups in the project area to understand their preferred methods of engagement, establish relationships, and introduce them to the TDLE project. See Table B8-1 for a complete list of stakeholder interviews.
- **Outreach toolkits:** The project team distributed outreach toolkits to social service organizations along the project corridor to encourage the sharing of information by trusted leaders with their audiences during outreach periods and to generate additional feedback. The toolkits included project emails, posters, factsheets, Facebook posts, and "X" (formerly Twitter) posts for organizations to post and share.

## 7 Outreach During EIS Process

Public input and involvement are critical to informing the alternatives development, environmental analysis, documentation, and review process outlined in Figure B7-1. Sound Transit engages the public in various ways through in-person and digital channels, including open houses, briefings, online open houses, and workshops.

The NEPA process encourages lead agencies to actively involve the public throughout project implementation. This includes providing notice of public hearings, holding public meetings, and making environmental documents available to the public. The outreach and coordination efforts Sound Transit took to achieve this are detailed in the sections below.



**Figure B7-1 Project Public Review and Comment Process**

## **7.1 Early Scoping Activities (April 2, 2018 – May 3, 2018)**

Outreach during Early Scoping focused on providing information about the representative project and gathering public feedback to inform the project scope and schedule. Sound Transit asked members of the public to comment on the purpose and need of the project and potential benefits, alternatives and impacts of proposed route alignments and stations. Outreach activities during Early Scoping included open houses, online open houses, and station area workshops.

Outreach activities:

- Agency, Jurisdictions, and Tribal Scoping Meeting  
Tuesday, April 17, 12:30 p.m. – 2:30 p.m.  
Best Western Plus Tacoma Dome Hotel, 2611 East E Street
- Open House – Tacoma  
Tuesday, April 17, 6 p.m. – 8 p.m.  
Best Western Plus Tacoma Dome Hotel, 2611 East E Street
- Open House – Federal Way  
Wednesday, April 18, 6 p.m. – 8 p.m.  
Todd Beamer High School, 35999 16th Avenue S
- Open House – Fife  
Tuesday, April 24, 6 p.m. – 8 p.m.  
Fife Community Center, 2111 54th Avenue E

One hundred ninety-two people attended the in-person open houses and offered comments via post-it notes on maps and interactive display boards, as well as through written comment forms. The open houses began with a presentation by the project team introducing the project and the process. Sound Transit staff were available at displays and maps to answer questions about routes, station options, and technical analysis.

An online open house was available from April 2, 2018, to May 3, 2018, for members of the public who were unable to attend the in-person meetings, to review and provide feedback on the representative alignment. All information and materials presented at the in-person open houses were available online. The site offered a project overview, an explanation of the Early Scoping process, the project purpose and need, representative alignments and plans for public engagement throughout the project. It also provided “translation widget” buttons to offer the option for users to translate content.

Visitors were encouraged to provide comments throughout the site on the project purpose and need, the benefits and impacts, and the representative alignment using electronic comment forms and an interactive map tool. This feedback helped inform which alignments would be studied leading into Scoping.

Between April 2, 2018, and May 3, 2018, there were 2,474 unique users who visited the online open house.

These activities were advertised with:

- Mailer notifications sent to 52,160 homes, apartments, and businesses.
- Two news releases on April 2 and April 16.
- Online and print ads in 12 local online and print publications.



- Posters distributed to 150 different locations between Kent and Tacoma (included translated versions in Spanish, Korean, Vietnamese, Khmer and Russian).
- Facebook and “X” ads that reached 30,047 subscribers and 81,500 followers.
- Five project email updates sent to approximately 5,300 recipients on April 2, April 12, April 16, April 24, and May 2.

During the Early Scoping period, Sound Transit received over 560 written comments from in-person and online comment forms.

Sound Transit hosted three station area workshops in South Federal Way, East Tacoma, and Tacoma Dome. Table B9-4 includes a full list of station area workshops throughout the project.

## 7.2 September 2018 Outreach

### *September 2018 Outreach Activities (Sep. 1, 2018 – Sep. 21, 2018)*

Between Early Scoping and Scoping outreach, Sound Transit focused on inclusive outreach with community groups, organizations, residents, businesses, and underrepresented populations along the project corridor who do not typically participate in traditional in-person and online open houses. Outreach efforts were geared towards equitable engagement (as described in Section B.6.10) and reaching potential future riders. Sound Transit provided translated text in Spanish, Korean, Vietnamese, Khmer and Russian for advertisements, project information, and the online open house.

Sound Transit shared project updates and sought feedback on the initial route and station concepts that were developed in Early Scoping. Sound Transit asked members of the public to comment on the potential for route and station alternatives. The feedback during this outreach period informed Stakeholder Group feedback and Elected Leadership Group recommendations for routes and alternatives to be studied in environmental review.

Outreach activities:

- Open House – Federal Way  
Tuesday, September 11, 6 p.m. – 8 p.m.  
Federal Way Performing Arts Center, 31510 Pete von Reichbauer Way S
- Open House – Fife  
Wednesday, September 12, 6 p.m. – 8 p.m.  
Fife High School, 5616 20th Street E
- Open House – Tacoma  
Wednesday, September 19, 6 p.m. – 8 p.m.  
Best Western Plus Tacoma Dome Hotel, 2611 East E Street

More than 175 people attended the three in-person open houses and offered over 150 map comments via post-it notes and 16 written feedback questionnaires. A rolling, narrated presentation explained the project status and how to provide comments, and Sound Transit staff were available at displays and maps to answer questions about routes, station options, and technical analysis. Partner agencies were also available to answer questions.

From September 1 to 21, 2018, an online open house was available for members of the public who were unable to attend the in-person open houses. The online open house provided a brief overview of the project and instructions on how to navigate the site, followed by a demographics survey. For each project segment, the station and route alternatives were presented with

explanations for their respective potential and challenges. Each station area page featured a question with criteria to evaluate each option to give users the opportunity to provide route and station-specific feedback.

Between September 1 and September 21, 2018, the online open house:

- Received over 2,800 different users over 3,500 unique sessions. Users spent an average of three minutes on the site.
- Was shared over 25 times by online open house visitors on social media networks, through available share “widget.”
- Received over 500 comments from online surveys.

These activities were advertised with:

- Postcard notifications distributed to over 67,000 homes, apartments, and businesses in the project area.
- Three project email updates sent to more than 6,200 recipients on the project listserv.
- Posters distributed to over 150 locations throughout Federal Way, Fife, Milton, Tacoma, and Puyallup Tribal areas.
- Print and online display advertisements in 11 local publications.
- Facebook posts on the Sound Transit page, reaching over 13,000 users and engaging over 600 people.
- Sound Transit posts on “X” reaching over 18,000 users and engaging 271 users with 16 reposts and 17 likes.
- One new release on August 30, 2018.
- Notification toolkits distributed to 10 local community organizations.

Throughout the outreach period, Sound Transit continued to conduct interviews with community leaders, jurisdictions, and social service providers to identify additional ways to reach underrepresented populations.

In the following month, October 2018, Sound Transit hosted three station area workshops focused on the South Federal Way, Fife, East Tacoma, and Tacoma Dome stations.

After the outreach and comment period, Sound Transit Government and Community Relations staff provided briefings covering the comment period and the Tacoma Dome Link Extension in general to over 10 organizations along the project corridor.

## **7.3 NEPA and SEPA Scoping Process**

*NEPA and SEPA Scoping Activities (April 1, 2019 – May 1, 2019)*

During the Scoping period, Sound Transit shared information on the latest route and station alternatives and topics to study in the EIS, as well as an overview of past project activity. Sound Transit sought public comment on the proposed route and station alternatives, the purpose and need of the project, and the potential environmental impacts or benefits to be studied in the EIS. Comments were gathered through in-person and online open houses and incorporated into a summary presented to the Sound Transit Board of Directors.

Outreach activities:

- Tribal, Agency, and Jurisdiction Scoping Meeting – Fife  
Tuesday, April 16, 2 p.m. – 4 p.m.  
Fife Community Center, 2111 54th Avenue E
- Open House – Fife  
Tuesday, April 16, 6 p.m. – 8 p.m.  
Fife Community Center, 2111 54th Avenue E
- Open House – Tacoma  
Wednesday, April 16, 6 p.m. – 8 p.m.  
Greater Tacoma Convention Center, 500 Commerce Street
- Open House – Federal Way  
Tuesday, April 23, 6 p.m. – 8 p.m.  
Federal Way Performing Arts and Event Center, 31510 Pete von Reichbauer Way S
- Listening session – Tacoma  
Thursday, May 3, 6 p.m. – 8 p.m.  
Eastside Community Center, 721 E 56th Street

More than 200 people attended the three open houses and Sound Transit received 60 written comment forms across all open houses and the listening session. Outreach efforts included equitable engagement as described in Section B.6.10.

An online open house was available from April 1, 2019, to May 1, 2019, and gave the public an opportunity to review and provide feedback on station and route alternatives. In-person open houses provided laptops for attendees to directly input their feedback around each alternative. The website featured the Tacoma Dome Link Extension Project purpose and need, information about the Scoping period and what an EIS entails, as well as a description of the advantages and disadvantages of each route and station alternative. Users were encouraged to comment on each station and route alternative after reviewing interactive maps, station plan layouts and visualizations.

Between April 1, 2019, and May 1, 2019, the online open house:

- Had 3,100 different visitors over 3,900 sessions. Users spent an average of three minutes on the site.
- Was organically shared 35 times on social media networks, through the share “widget.”

These activities were advertised with:

- Mailer notifications sent to over 67,000 households and businesses, providing overview of the entire project and feedback received to date.
- Posters distributed to 151 locations throughout Federal Way, Fife, Milton, Tacoma, and Puyallup Tribal areas (including translated versions in Korean, Spanish and Vietnamese).
- Project email updates to more than 6,200 recipients on the South Sound email list.
- Print and online display advertisements in 13 local publications.
- Notification toolkits to 29 local organizations and properties to share with their respective networks.
- Briefings to organizations and cities in the project corridor.

- In-person field visits to major properties where sites were being considered.
- Social media posts, which reached over 34,500 Facebook users and engaged over 140 "X" users.

During the Scoping period, Sound Transit received over 600 comments from the in-person open houses, the online open house, email and mail, and by phone. These comments were documented in a Scoping Summary Report (Sound Transit 2019b).

## 7.4 Continued Public Outreach

### *November 2019 Outreach Activities (November 13, 2019 – December 6, 2019)*

Sound Transit focused outreach efforts during Draft EIS development on providing updates on the process to-date and the preferred and other alternatives for study identified by the Sound Transit Board of Directors. This outreach period was intended to provide a project update around alternatives design. This was achieved through a series of informal drop-in sessions and an online open house.

The project team chose a variety of drop-in locations and times to ensure interested members of the public could attend. Many drop-in sessions were in areas accessible by transit or at common community spaces. Visitors were encouraged to stay up to date on project information and stay tuned for their future opportunity to provide input during the Draft EIS comment period. In-language materials were available at all drop-in sessions.

- Federal Way Link Extension Open House  
Wednesday, November 13, 6 p.m. – 8 p.m.  
Highline College, 2400 S 240th Street, Des Moines
- Drop-in session – East Tacoma  
Saturday, November 16, 10 a.m. – 12 p.m.  
Eastside Community Center, 1721 E 56th Street, Tacoma
- Drop-in session – Federal Way  
Saturday, November 16, 10 a.m. – 12 p.m.  
Federal Way Library, 34200 1st Way S, Federal Way
- Drop-in session – Milton  
Wednesday, November 20, 8 a.m. – 10 a.m.  
Starbucks, 623 Meridian Ave NE, Edgewood
- Drop-in session – Tacoma  
Wednesday, November 20, 5 p.m. – 7 p.m.  
Evergreen State College Tacoma Campus, 1210 6th Avenue E, Tacoma
- Federal Way Link Extension Open House  
Wednesday, November 20, 6 p.m. – 8 p.m.  
Federal Way Performing Arts Center, 31510 Pete von Reichbauer Way S, Federal Way
- Drop-in session – Fife  
Thursday, November 21, 10 a.m. – 12 p.m.  
Poodle Dog, 522 54th Avenue E, Fife

- Drop-in session – Tacoma  
Tuesday, December 3, 10 a.m. – 12 p.m.  
UW Tacoma, 1900 Commerce Street, Tacoma
- Drop-in session – Tacoma  
Wednesday, December 4, 6 a.m. – 8 a.m.  
Tacoma Sounder Station, 610 Puyallup Avenue, Tacoma
- Drop-in session – Federal Way  
Wednesday, December 4, 5 p.m. – 7 p.m.  
Federal Way Community Center, 876 S 333rd Street, Federal Way
- Drop-in session – Tacoma  
Friday, December 6, 6 p.m. – 8 p.m.  
Salishan Family Investment Center, 1724 E 44th Street, Tacoma

More than 350 people attended drop-in sessions in Federal Way, Fife, Milton, and Tacoma.

An online open house was available from November 13, 2019, to December 9, 2019. It provided a project update on work that occurred after Scoping in spring 2019 and gave the public an opportunity to review and comment on station and route alternatives. The site featured preliminary station layouts and visualizations, outlined the next steps for the project and the next opportunity to provide project comments and feedback.

Outreach efforts sought equitable engagement as described in Section B.6.10. All materials from the drop-in sessions were available on the site. The site had a landing page translated into Khmer, Korean, Russian, Spanish, and Vietnamese with instructions on using Google Translate to navigate the site.

Between November 13, 2019, and December 9, 2019, the online open house:

- Had 1,575 unique visitors and over 1,720 sessions. Users spent an average of 3 minutes on the site, and it was shared 71 times.

These activities were advertised with:

- Facebook posts reaching over 16,400 users.
- Mailers to over 59,000 homes, apartments, and businesses along the project corridor.
- Second mailer to over 2,500 properties within 500-feet of any alternative as invitation to get engaged with “we’re in the neighborhood” message.
- Posters distributed to 107 different locations in Federal Way, Fife, Milton, Tacoma, and Puyallup Tribal areas.
- Three project email updates sent to more than 6,200 recipients on South Sound email lists.
- Print and online display advertisements in 11 local publications.
- Notification toolkits sent to 12 local organizations and properties to share with their respective networks.
- “X” (formerly Twitter) notifications.

Between November 13, 2019, and December 6, 2019, Sound Transit received over 20 comments from in-person drop-in sessions, online open house comment forms, and email. Comments received during this outreach period were not logged as part of a formal comment

period. This comment period was intended for the public to share thoughts or ask questions they had as the project moved forward.

*Fall 2020 Outreach Activities (September 22, 2020 – November 2, 2020)*

Sound Transit conducted COVID-sensitive engagement to provide updates on the latest project refinements being studied in the Draft EIS. In addition to learning more about the status of the project, members of the public were invited to review and comment on preliminary station design concepts, as well as offer feedback on potential projects to improve access to the stations for those walking, rolling (e.g., using a wheelchair or riding a bicycle), and taking transit. This outreach period was intended to expand the project audience – particularly to historically underrepresented communities – in advance of the Draft EIS publication. Virtual briefings and an online open house were used to engage the public during the outreach period.

Sound Transit participated in 11 virtual conversations with 10 community-based organizations to bolster engagement with the online open house content. The format of these conversations was tailored to support the requested needs of each organization (see Table B62). Visitors were encouraged to stay up to date on project information and stay tuned for their future opportunity to provide input during the Draft EIS comment period.

**Table B6-2 Online Meetings with Community-Based Organizations**

Organization	Briefing Audience	Date	Format
Asia Pacific Cultural Center	Staff and member community leaders	Oct. 1 and 29	Two virtual listening sessions: the first to support community leaders in understanding engagement and feedback goals so they could disseminate information in their respective communities and encourage participation; the second to listen to feedback collected
Federal Way Black Collective	Members	Oct. 1	Virtual Facebook Live facilitated discussion with representatives from Tacoma Dome Link Extension, Federal Way Link Extension, and Operations and Maintenance Facility South projects
Active Transportation Community of Interest Puyallup Watershed Initiative	Members	Oct. 8	Virtual regular monthly meeting
Tacoma Area Commission on Disabilities	Members	Oct. 9	Virtual regular monthly meeting
Multi-Service Center	Staff	Oct. 15	Virtual presentation to staff members
Tacoma Transit-Oriented Development Advisory Group	Members	Oct. 19	Virtual regular monthly meeting
Tacoma Transportation Commission	Members	Oct. 21	Virtual regular monthly meeting
Fife Library	Parents and young children	Oct. 23	Train-themed, virtual story time event with train safety discussion for young children and their parents
Tacoma Bicycle Pedestrian Technical Advisory Group	Members	Oct. 26	Virtual regular monthly meeting
Salishan Association	Staff	Oct. 29	Virtual presentation to organization staff

The project team was also invited to provide shorter updates to promote the engagement period during regularly scheduled meetings or by email with the following project partners:

- Eastside Collaborative.
- Eastside Neighborhood Advisory Council of Tacoma.
- Fife Chamber of Commerce.
- Hopelink.
- New Tacoma Neighborhood Council.

More than 1,300+ people attended the 16 virtual briefings.

An online open house was available from September 29, 2020, to November 2, 2020. It provided a project update on work that occurred after the fall 2019 outreach and gave the public an opportunity to view station concept graphics for each station alternative and answer survey questions related to these concepts. Additionally, the site used maps and text to describe potential projects to improve nonmotorized access to the station and visitors were asked to provide comments on the projects. Visitors could also suggest new projects for Sound Transit to include in their evaluation.

Outreach efforts sought equitable engagement as described in Section B.6.10. All materials from the virtual briefings were available on the online open house. The site content was fully available in English, Korean, Spanish, and Vietnamese, with instructions on using Google Translate to navigate the site.

Between September 29, 2020, and November 2, 2020, the online open house:

- Had more than 3,300 unique visitors to the English online open house site.
  - 230 visitors to the Spanish site.
  - 40 visitors to the visitors to the Vietnamese site.
  - 40 visitors to the Korean site.

These activities were advertised with:

- Facebook posts.
- Three project email updates sent to more than 5,200 listserv subscribers.
- Print and online display advertisements in 11 local publications.
- Notification toolkits sent to 50 local organizations and properties to share with their respective networks.
- “X” (formerly Twitter) notifications.

Between September 29, 2020, and November 2, 2020, Sound Transit received over 210+ responses to the station design concept surveys and 200+ reactions to the nonmotorized projects. This comment period was intended for the public to share thoughts or ask questions they had about station access planning.

#### *Spring 2023 Outreach Activities (February 27, 2023 – March 17, 2023)*

Sound Transit identified the need to consider additional route and station options through conversations with the Puyallup Tribe of Indians, the City of Fife, and FTA. Outreach efforts in spring 2023 focused on providing updates on the process to-date and the additional alignment



alternatives and station options that were being considered for study in the environmental review process. This was achieved through a series of informal drop-in sessions and an online open house.

The project team used a variety of drop-in locations and times to ensure interested members of the public could attend. Many drop-in sessions were in areas accessible by transit or at common community spaces. Visitors were encouraged to stay up to date on project information and stay tuned for their future opportunity to provide input during the Draft EIS comment period.

- Drop-in session – Milton  
Wednesday, March 8, 5 p.m. – 7 p.m.  
Milton/Edgewood Pierce County Library, 900 Meridian Avenue E, Milton, WA 98354
- Drop-in session – Federal Way  
Tuesday, March 14, 8 a.m. – 10 a.m.  
Federal Way Community Center, 876 S 333rd Street, Federal Way, WA 98003
- Drop-in session – Fife  
Wednesday, March 15, 11 a.m. – 1 p.m.  
Poodle Dog Restaurant, 1522 54th Avenue E, Fife, WA 98424

More than 110 people attended drop-in sessions in Federal Way, Fife, and Milton.

An online open house was available from February 17, 2023, to March 17, 2023. It provided a project update on design progress since fall 2020 and gave the public an opportunity to learn about the new route and station options in South Federal Way and Fife being considered for study in the environmental review process. The site featured preliminary station layouts and visualizations, outlined the next steps for the project, and showed the next opportunity to provide project comments and feedback.

Outreach efforts sought equitable engagement, as described in Section B.6.10. All materials from the drop-in sessions were available on the site. The online open house was translated into English, Khmer, Korean, Russian, Spanish, and Vietnamese, with instructions on using Google Translate to navigate the site.

Between February 27, 2023, and March 17, 2023, the online open house:

- Had 2,150 unique visitors, including over 50 visitors to in-language sites.

These activities were advertised with:

- Facebook posts.
- Mailers to over 12,900 homes, apartments, and businesses near the proposed route and station options in Fife, Milton, and South Federal Way.
- Three project email updates sent to more than 5,200 listserv subscribers.
- More than 60 phone calls to properties potentially affected by the potential route and station options in Fife, Milton, and South Federal Way.
- Notification toolkits sent to five local organizations and properties to share with their respective networks.
- “X” (formerly Twitter) notifications.

Between February 27, 2023, and March 17, 2023, Sound Transit received 30 responses from the Fife survey and 45 responses from the South Federal Way survey. This comment period was intended for the public to share thoughts or ask questions as the project moved forward.

## 7.5 Draft EIS Comment Period

### *Draft EIS Outreach Activities (December 13, 2024-February 10, 2025)*

The TDLE Draft EIS describes the project purpose and need, the alternatives analyzed, and potential environmental impacts of the alternatives and their implementation. It also describes methodologies and assumptions used for the analyses and identifies potential mitigation for unavoidable impacts.

The Draft EIS has been distributed to federal, state, and local agencies and parties of interest listed in Appendix A2 for comment. A Notice of Availability was published in the *Federal Register* and the SEPA Register on December 13, 2024. The following notifications and advertisements were also used to notify the public about the Draft EIS availability and public process.

- Legal notices placed in *The News Tribune* and *The Seattle Times*.
- Public notices placed in local newspapers.
- Project mailer sent to residents and businesses in the corridor, as well as individuals in the project database, announcing the availability of the Draft EIS, describing how to comment, and providing information about the Draft EIS.
- Email notification sent to subscribers to the project listserv.
- Notice posted on the Sound Transit TDLE website and on home page of Soundtransit.org
- Poster notices placed along the project corridor.

The Draft EIS documents are available to the public at public meetings and at the following public libraries:

- Federal Way 320th Library.
- Federal Way Library.
- Fife Pierce County Library.
- Milton/Edgewood Pierce County Library.
- Tacoma Public Library Mottet Branch.

The Draft EIS is available at Sound Transit offices and electronically on the Sound Transit TDLE website. The 60-day public comment period began upon publication of the Notice of Availability for the Draft EIS and will be open until February 10, 2025. A website focused on the Draft EIS results was set up for the comment period. This website allowed users to view simulations of the TDLE alternatives, review impacts for different combinations of the alternatives, and provide comments on the Draft EIS.

Public meetings will be held to present the Draft EIS findings, including alternatives development and associated environmental impacts, for public review and comment. The meetings will consist of an open house to present the Draft EIS findings and where project team members will be available to answer questions and talk to the public. Table B7-1 lists the dates and locations of the hearings. The meeting format is a combination of an open house, with project team members available to answer questions, and a formal public hearing. The meetings will also include a transcribed formal public hearing. Comments will be accepted in writing, transcribed by a court reporter, or through email.

A summary of Draft EIS comments will be provided to the Sound Transit Board of Directors. The comment summary will help inform the Board action to confirm or modify the Preferred Alternative or identify one in locations where there is not currently a preferred alternative. All substantive comments will be responded to in the Final EIS.

**Table B7-1 TDLE Draft EIS Public Hearings**

Date	Location	Type of meeting
January 21, 2025	Online (Zoom): <a href="https://us02web.zoom.us/j/85314895495">https://us02web.zoom.us/j/85314895495</a> 11:30 a.m.-1:30 p.m.	Online public meeting and hearing
January 23, 2025	Greater Tacoma Convention Center 1500 Commerce Street, Tacoma, WA 98402 5:30-7:30 p.m.	Public hearing and open house
January 28, 2025	Federal Way Performing Arts and Events Center 31510 Pete von Reichbauer Way S, Federal Way, WA 98003 5:30-7:30 p.m.	Public hearing and open house
January 30, 2025	Fife Community Center 2111 54th Avenue E, Fife, WA 98424 5:30-7:30 p.m.	Public hearing and open house

## 7.6 Final EIS

After the Sound Transit Board reviews and considers the Draft EIS findings as well as comments on the Draft EIS, they are anticipated to confirm or modify the Preferred Alternative. In locations where there is not currently a preferred alternative, the Sound Transit Board would identify a Preferred Alternative.

The Final EIS would analyze the effects of the Preferred Alternative and all of the other alternatives studied in the Draft EIS and respond to substantive comments on the Draft EIS.

Following publication of the Final EIS, the Sound Transit Board would consider the Final EIS findings and would select the project to be built. FTA will subsequently issue a Record of Decision that would document the project selected to be built as well as mitigation measures. After the build alternative is selected by the Sound Transit Board and approved by FTA as part of the Record of Decision, Sound Transit will continue to coordinate throughout final design and construction with affected Tribes, agencies, and local communities.

## 8 Stakeholder briefings, interviews, and events

**Table B8-1 List of Briefings and Interviews**

Organization	Date
<b>Briefings</b>	
301 E 26th Street Developers	10/14/2021
59th Ave Partners LLC	6/3/2021
Active Transportation Community of Interest Puyallup Watershed Initiative	10/8/2020
Affordable Housing Consortium	9/13/2018
Asia Pacific Cultural Center	4/29/2024

**Table B8-1 List of Briefings and Interviews (continued)**

<b>Organization</b>	<b>Date</b>
Associated Catholic Cemeteries	5/15/2023
Bates Technical College	3/7/2019
Belmor Park Golf and Country Club	8/20/2019
Bicycle Pedestrian Transportation Advisory Group	10/26/2020
Building Owners and Managers Association	4/28/2021
Camping World	9/28/2020
Community Oversight Panel	3/8/2023
Creating Our King County	5/5/2018
DBM Contractors	4/6/2023
Dome District	<b>2018:</b> 7/12/2018, 8/9/2018, 11/8/2018 <b>2019:</b> 2/14/2019, 3/14/2019, 4/15/2019, 7/11/2019, 11/14/2019, 12/13/2019
Dome District Businesses	5/13/2024, 6/10/2024, 7/8/2024
Dome District Social	10/10/2019
Dome District, 4 agencies meeting (WSDOT, City of Tacoma, Pierce Transit, and Sound Transit)	9/5/2018
Dometop Neighbors	6/12/2024
Downtown on the Go Board of Directors	<b>2018:</b> 4/12/2018 <b>2019:</b> 4/11/2019
Downtown on the Go	<b>2019:</b> 11/8/2019, 11/15/2019
Downtown Tacoma BIA	9/6/2018
East Tacoma Collaborative	<b>2019:</b> 11/15/2019 <b>2020:</b> 9/9/2020, 12/9/2020
Eastside Collaborative	<b>2018:</b> 6/29/2018, 7/9/2018, 9/27/2018, 12/21/2018 <b>2020:</b> 8/26/2020
Eastside Neighborhoods Advisory Council of Tacoma (ENACT)	<b>2018:</b> 10/15/2018 <b>2019:</b> 11/18/2019 <b>2024:</b> 6/17/2024
Edgewood Fife Milton Kiwanis Club	<b>2018:</b> 5/31/2018, 9/27/2018
Esplanade (Tacoma) Speaker Series	9/23/2018
Federal Way Chamber of Commerce	<b>2018:</b> 8/21/2018, 9/11/2018 <b>2019:</b> 3/21/2019, 3/6/2019 <b>2020:</b> 8/5/2020 <b>2021:</b> 10/14/2021 <b>2022:</b> 5/4/2022 <b>2023:</b> 7/5/2023
Federal Way City Council	<b>2018:</b> 5/15/2018 <b>2019:</b> 10/1/2019 <b>2020:</b> 11/17/2020 <b>2023:</b> 3/7/2023
Federal Way Community Connections	9/4/2018
Federal Way Diversity Commission	1/9/2019

**Table B8-1 List of Briefings and Interviews (continued)**

Organization	Date
Fife City Council	<b>2018:</b> 2/27/2018 <b>2020:</b> 8/18/2020 <b>2023:</b> 4/18/2023
Fife Business Park	1/6/2021
Fife businesses	12/23/2019
Fife Milton Edgewood Chamber Membership	4/18/2018
Fife Pacific Plaza	6/26/2019
Freighthouse Square Owners	<b>2019:</b> 11/6/2019, 11/8/2019, 11/26/2019, 11/22/2019, 12/23/2019
Graham Real Ventures	9/6/2022
Harsch Investment Properties	<b>2019:</b> 10/3/2019, 12/3/2019, 12/4/2019 <b>2020:</b> 1/13/2020
HealthPoint Federal Way/King County Public Health	1/9/2019
Infiniti Dealership	8/26/2020
JetroRD	12/16/2020
John L Scott/Windermere	11/20/2020
Joe Hall Construction	12/2/2020
Kings Motor Inn	<b>2020:</b> 8/4/2020 <b>2022:</b> 11/15/2022
Kitsap Bank	4/28/2021
Korean Community Quarterly Meeting	<b>2018:</b> 9/20/2018 <b>2019:</b> 3/21/2019
Korean Women's Association	1/16/2020
Lynden Transport	11/27/2023
McDonalds (Fife)	9/4/2019
City of Fife and Pick-Quick, Bucky's Auto	6/5/2019
Mark Coleman and the City of Fife	7/16/2019
VT Radio and East Tacoma Collaborative	6/12/2019
Milton City Council	<b>2018:</b> 3/5/2018 <b>2019:</b> 4/8/2019 <b>2020:</b> 9/14/2020 <b>2023:</b> 5/8/2023
Milton Storage	11/15/2023
Merlone Geier Partners	2/23/2022
Multi Service Center	<b>2019:</b> 1/15/2019 <b>2020:</b> 10/15/2020 <b>2024:</b> 6/25/2024
NE Tacoma Neighborhood Council	4/20/2023
New Tacoma Neighborhood Council	<b>2018:</b> 4/11/2018, 12/12/2018 <b>2019:</b> 1/9/2019, 2/13/2019, 5/8/2019, 6/12/2019, 9/11/2019, 11/13/2019 <b>2020:</b> 9/9/2020, 10/14/20 <b>2021:</b> 6/6/2021, 7/5/2021, 9/8/2021, 10/13/2021 <b>2022:</b> 4/13/2022, 5/11/2022, 9/14/2022
North Lake Improvement Club of Federal Way	3/4/2019

**Table B8-1 List of Briefings and Interviews (continued)**

<b>Organization</b>	<b>Date</b>
O'Brien Auto Group/Tacoma RV Briefing	1/23/2019
PNW Dealers	11/4/2020
Pacific Lutheran University Writing 101 Class on Public Transportation	10/23/2018
Pierce County Chief Appointed Officials	11/21/2018
Pierce County Coordinated Transportation Coalition	5/17/2019
Pierce County Council	4/25/2023
Port of Tacoma Commission	<b>2018:</b> 4/19/2018 <b>2019:</b> 3/21/2019 <b>2020:</b> 8/20/2020
Poulsbo RV	1/13/2020
Presentation to Pierce DSHS WorkFirst network	7/23/2019
Raceways Technology	<b>2019:</b> 10/23/2019 <b>2021:</b> 1/15/2021
Rainbow Center	7/17/2018
Rainier View Senior Apartments	12/19/2018
Salishan Association Virtual Coffee Connections Cafe	6/30/2020, 7/21/2020, 8/18/2020, 9/1/2020
SeaMar Fife	3/8/2019
Smith Brothers Farms	2/2/2021
Sound Ford	8/26/2020
South End Neighborhood Council	1/4/2021
South King County Mobility Coalition	<b>2018:</b> 11/8/2018 <b>2019:</b> 7/11/2019 <b>2020:</b> 9/10/2020
South King Fire	10/18/2023
Spring Valley Mobile Home Park	6/8/2023
St. Paul Chong Hasang Church	<b>2018:</b> 10/24/2018 <b>2023:</b> 4/12/2023, 10/11/2023
Tacoma Area Commission on People with Disabilities	<b>2019:</b> 4/12/2019 <b>2020:</b> 10/9/2020
Tacoma City Council	<b>2018:</b> 9/11/2018 <b>2019:</b> 3/19/2019, 6/11/2019, 11/12/2019 <b>2020:</b> 8/4/2020 <b>2021:</b> 3/30/2021 <b>2023:</b> 3/21/2023 <b>2024:</b> 5/21/2024

**Table B8-1 List of Briefings and Interviews (continued)**

Organization	Date
Tacoma Councilmembers	<b>2018:</b> 1/28/2018 <b>2019:</b> 9/17/2019, 9/20/2019, 9/30/2019, 10/1/2019, 11/4/2019, 11/5/2019
Tacoma Green Drinks	8/2/2018
Tacoma Kiwanis Club	<b>2019:</b> 6/19/2019 <b>2022:</b> 4/19/2022
Tacoma IPS Committee	2/28/2018
Tacoma JMAC	1/11/2019
Tacoma Public Utilities	1/7/2019
Tacoma Planning Commission	<b>2019:</b> 3/20/2019, 11/18/2019
Tacoma Soccer Center	1/29/2021
Tacoma TOD Advisory Group	<b>2019:</b> 10/21/2019, 11/18/2019, 12/16/2019 <b>2020:</b> 10/19/2020
Tacoma Transportation Commission	<b>2018:</b> 12/19/2018 <b>2019:</b> 3/20/2019, 11/18/2019 12/19/2019 <b>2020:</b> 10/21/2020
Tacoma Urban League	5/11/2022
Telecare Corp	12/18/2020
Transit Access Stakeholders	1/10/2019
Union Marine	<b>2020:</b> 9/23/2020 <b>2021:</b> 6/23/2021
Walmart	5/14/2024
<b>Stakeholder Interviews</b>	
Asia Pacific Cultural Center	10/18/2019
City of Fife	10/17/2019
Consejo Counselling	8/8/2018
East Tacoma Collaborative	10/18/2019
Eastside Community Center	10/24/2019
Fife Public Schools	11/20/2019
Habitat for Humanity	7/18/2018
Hopelink	11/25/2019
Korean Women's Association	10/31/2019
L'Arche Tahoma Hope	7/11/2018
Pierce County Aging and Disability Resource Center and Pierce County Coordinated Transportation Coalition	7/11/2018
Salishan Association	<b>2018:</b> 7/18/2018 <b>2019:</b> 11/4/2019
St. Paul Chong Hasang Church	11/8/2019
Summit Olympus School	6/27/2018
Tacoma Area Coalition for Individuals with Disabilities	<b>2018:</b> 7/18/2018 <b>2019:</b> 10/17/2019
Tacoma Community House	6/26/2018
Tacoma Public Schools	6/28/2018
Tacoma Urban League	10/17/2019



**Table B8-2 Community Events**

Organization	Date
<b>Fairs, Festivals and Tabling Events</b>	
Adventist Community Services Food Bank	8/15/2018
Broadway Farmers Market	9/27/2018
Downtown on the Go Block Party	9/7/2019
Downtown Tacoma Block Party	8/4/2024
Downtown to Defiance	9/9/2018
East Tacoma Community Office Hours	2/23/2019
Eastside Family Support Center Block Party	8/12/2018
EL1 Vision Night	4/28/2019
Federal Way Community Festival (previously the Flavor of Federal Way)	<b>2018:</b> 8/18/2018 <b>2019:</b> 8/10/2019, 8/17/2019 <b>2024:</b> 8/10/2024
Federal Way Farmers Market	<b>2018:</b> 6/22/2018 <b>2019:</b> 7/27/2019, 7/29/2019 <b>2021:</b> 6/19/21, 7/24/21 <b>2022:</b> 9/5/2022
Federal Way Library	1/20/2019, 1/23/2019, 1/30/2019, 11/16/2019
Federal Way Community Center Touch-a-truck	5/20/2023
Federal Way State of the City	<b>2019:</b> 2/28/2019 <b>2020:</b> 2/27/2020
Federal Way Transit Center Outreach	8/31/2018
Fife Harvest Festival	<b>2018:</b> 10/5/2018 <b>2019:</b> 10/6/2019 <b>2022:</b> 10/1/2022 <b>2023:</b> 10/7/2023 <b>2024:</b> 10/5/2024
Fife Library	<b>2019:</b> 1/7/2019, 1/15/2019 <b>2020:</b> 8/12/2020, 10/23/2020
Fife Music in the Park	6/29/2018
Fife Pride Bingo Night	<b>2022:</b> 6/11/2022 <b>2023:</b> 6/3/2023
Fix-It Fair	2/23/2019
Foss Water Summer Concert Series	6/15/2019
Greentrike Back to School Event	8/31/2022
Korean Chuseok Festival (Asia Pacific Cultural Center)	<b>2023:</b> 9/23/2023 <b>2024:</b> 9/14/2024
Lincoln High School Back to School Fair	10/9/2018
Lunar New Year (Asia Pacific Cultural Center)	<b>2022:</b> 2/19/2022 <b>2024:</b> 2/24/2024
Milton Community Office Hours	2/21/2019
Milton Days	<b>2018:</b> 8/19/2018 <b>2019:</b> 8/15/2019

**Table B8-2 Community Events (continued)**

Organization	Date
	<b>2024:</b> 8/17/2024
MOSAIC Festival (formerly Ethnic Festival)	<b>2018:</b> 7/28/2018, 7/29/2018 <b>2019:</b> 7/28/2019 <b>2022:</b> 7/23/2022, 7/24/2022 <b>2023:</b> 7/29/23, 7/30/23
Park(ing) Day	9/16/2022
Pasifika Food Fest (Asia Pacific Cultural Center)	<b>2021:</b> 7/31/2021 <b>2022:</b> 7/30/2022
Pierce Transit BRT Open House	<b>2019:</b> 1/24/2019, 1/29/2019
Puyallup Avenue Corridor Improvements Open House	5/29/2024
Puyallup Tribe Pride	<b>2023:</b> 7/22/2023 <b>2024:</b> 7/20/2024
Puyallup Tribe Youth Canoe Journey	7/31/2024
Red, White, and Blue Festival	7/4/2018
Roosevelt Elementary Back to School Fair	10/3/2018
Salishan Association Holiday Bazaar	12/6/2019
Salishan Association's Night Out Festival	<b>2019:</b> 8/7/2019, 8/8/2019 <b>2021:</b> 8/3/2021 <b>2022:</b> 8/2/2022 <b>2023:</b> 8/1/2023 <b>2024:</b> 8/6/2024
Sound to Narrows	6/26/2018
Sounders FC2 Game	8/29/2018
Tacoma Juneteenth	<b>2023:</b> 6/21/2023 <b>2024:</b> 6/19/2024
Tacoma Pride	<b>2018:</b> 7/13/2018, 7/14/2018 <b>2022:</b> 7/9/2022 <b>2023:</b> 7/25/2023 <b>2024:</b> 7/13/2024
Tacoma Rainiers Game	8/16/2018
Tacoma Sounder Station tabling	9/17/2018

## 9 Public and Stakeholder Outreach Meetings

**Table B9-1 Stakeholder Group, Elected Leadership Group, and Interagency Group Meetings**

Organization	Date
<b>Elected Leadership Group</b>	
Elected Leadership Group Meetings	<b>2018:</b> 2/16/2018, 3/19/2018, 5/16/2018, 7/13/2018, 10/12/2018, 11/20/2018 <b>2019:</b> 2/22/2019, 5/31/2019, 6/14/2019
<b>Interagency Group Meetings</b>	
Interagency Group Meetings	<b>2018:</b> 3/5/2018, 4/2/2018, 5/7/2018, 6/4/2018, 7/16/2018, 9/10/2018, 10/1/2018, 12/3/2018 <b>2019:</b> 1/7/2019, 2/19/2019, 3/4/2019, 5/6/2019, 5/26/2019, 7/22/2019, 10/7/2019, 12/2/2019 <b>2020:</b> 1/6/2020, 2/3/2020, 4/6/2020, 6/1/2020, 8/3/2020, 9/14/2020, 12/7/2020 <b>2021:</b> 4/5/2021, 8/2/2021 <b>2022:</b> 2/7/2022, 6/6/2022 <b>2023:</b> 3/6/2023, 5/2/2023, 10/2/2023 <b>2024:</b> 8/5/2024, 11/4/2024
<b>Stakeholder Group</b>	
Stakeholder Group Meeting	<b>2018:</b> 3/28/2018, 5/22/2019, 7/31/2018, 9/27/2018 <b>2019:</b> 3/26/2019, 5/29/2019

**Table B9-2 Public Outreach Meetings and Workshops**

Organization/Location	Date
<b>Drop-in sessions</b>	
Eastside Community Center	11/16/2019
Evergreen State College Tacoma Campus	11/20/2019
Federal Way Community Center	<b>2019:</b> 12/4/2019 <b>2023:</b> 3/14/2023
Federal Way Library	11/16/2019
Federal Way Link Extension Open House	<b>2018:</b> 11/13/2019, 11/20/2019
Fife Pierce County Library	12/3/2019
Milton Starbucks	11/20/2019
Milton/Edgewood Pierce County Library	3/8/2023
Poodle Dog (Fife)	<b>2019:</b> 11/21/2019 <b>2023:</b> 3/15/2023
Salishan Family Investment Center Holiday Bazaar	12/6/2019
Tacoma Sounder Station	12/4/2019
UW Tacoma	12/3/2019

**Table B9-2 Public Outreach Meetings and Workshops (continued)**

Organization/Location	Date
<b>Open House</b>	
Early Scoping 2018 open house	<b>2018:</b> 4/16/2018, 4/17/2018, 4/23/2018
September 2018 outreach open house	<b>2018:</b> 9/12/2018, 9/11/2018, 9/19/2018
Scoping 2019 open house	<b>2019:</b> 4/17/2019, 4/18/2019, 4/24/2019
Draft EIS public meetings and hearings	<b>2025:</b> 1/21/2025, 1/23/2025, 1/28/2025, 1/30/2025
<b>Station Area Workshops</b>	
South Federal Way Station Area Workshop	4/25/2018
East Tacoma and Tacoma Dome Station Area Workshop	<b>2018:</b> 4/26/2018, 11/1/2018
Fife Station Area Workshop	5/1/2018
Federal Way and Fife Station Area Workshop	10/25/2018
Fife and Tacoma Station Area Workshop	1/22/2020
Federal Way Station Area Workshop	1/29/2020
<b>Online Events and Briefings</b>	
Active Transportation Community of Interest Puyallup Watershed Initiative	10/8/2020
Asia Pacific Cultural Center	<b>2020:</b> 10/1/2020, 10/29/2020 <b>2021:</b> 11/6/2021
Federal Way Black Collective	<b>2020:</b> 10/1/2020 <b>2021:</b> 3/11/2021
Fife Library Storytime	10/23/2020
Multi Service Center	<b>2020:</b> 10/15/2020 <b>2021:</b> 4/15/2021
Tacoma Area Commission on Disabilities	10/9/2020
Tacoma Bicycle Pedestrian Technical Advisory Group	10/26/2020
Tacoma Transportation Commission	10/21/2020
Tacoma Transit-Oriented Development Advisory Group	10/19/2010
Salishan Association	10/29/2020

## 10 References

- Sound Transit. 2018a. Tacoma Dome Link Extension Early Scoping Information Report. <https://www.soundtransit.org/sites/default/files/project-documents/AE0030-17%25205.3.B%2520TDLE%2520Early%2520Scoping%2520Information%2520Report%2520Final%252020180327.pdf>.
- Sound Transit. 2018b. Tacoma Dome Link Extension Early Scoping Report and Appendices. <https://www.soundtransit.org/sites/default/files/project-documents/AE%25200030-17%25205.3.C%2520Early%2520Scoping%2520Summary%2520Report%2520and%2520Appendices%2520.pdf>.
- Sound Transit. 2019a. Tacoma Dome Link Extension Coordination Plan. August 2019.
- Sound Transit. 2019b. Tacoma Dome Link Extension Scoping Information Report. <https://www.soundtransit.org/sites/default/files/documents/tacoma-dome-link-extension-scoping-information-report.pdf> and appendices: <https://www.soundtransit.org/get-to-know-us/documents-reports/tacoma-dome-link-extension-scoping-summary-report-appendices>.



# ***Tacoma Dome Link Extension***

**Draft** Environmental Impact Statement

## ENVIRONMENTAL JUSTICE

### Appendix C

Table of Contents

APPENDIX C ENVIRONMENTAL JUSTICE TECHNICAL REPORT ..... C-1

1 INTRODUCTION TO RESOURCE AND REGULATORY REQUIREMENTS ..... C-1

1.1 Regulatory Framework ..... C-1

2 METHODS AND APPROACH..... C-4

2.1 Data Sources..... C-5

2.2 Study Area..... C-6

3 STUDY AREA DEMOGRAPHICS..... C-6

3.1 Study Area Characteristics ..... C-6

3.1.1 Federal Way Segment ..... C-20

3.1.2 South Federal Way Segment..... C-20

3.1.3 Fife Segment ..... C-21

3.1.4 Tacoma Segment ..... C-21

3.2 Study Area Schools..... C-22

4 OUTREACH TO MINORITY AND LOW-INCOME POPULATIONS..... C-23

4.1 SEPA Early Scoping Outreach ..... C-25

4.2 September 2018 Outreach Activities ..... C-26

4.3 NEPA/SEPA Scoping Outreach ..... C-27

4.4 Targeted Outreach Efforts ..... C-29

4.5 Tribal Coordination ..... C-40

5 RACIAL EQUITY TOOL PROCESS ..... C-41

6 POTENTIAL PROJECT IMPACTS AND MITIGATION..... C-42

6.1 Potential Project Impacts and Mitigation Strategies ..... C-42

6.2 Relocation and Acquisition Impacts..... C-52

6.3 General Construction Impacts ..... C-55

6.4 Indirect Impacts ..... C-55

6.5 Cumulative Impacts ..... C-56

7 PROJECT BENEFITS..... C-57

7.1 Transit Benefits ..... C-57

7.2 Other Benefits ..... C-58

8 CONCLUSION ..... C-59

9 REFERENCES ..... C-60

Attachments

C1 EJScreen Reports



## Figures

Figure C3-1	Low-Income Populations, Federal Way Segment .....	C-8
Figure C3-2	Low-Income Populations, South Federal Way Segment .....	C-9
Figure C3-3	Low-Income Populations, Fife Segment.....	C-10
Figure C3-4	Low-Income Populations, Tacoma Segment.....	C-11
Figure C3-5	Minority Populations, Federal Way Segment .....	C-12
Figure C3-6	Minority Populations, South Federal Way Segment .....	C-13
Figure C3-7	Minority Populations, Fife Segment.....	C-14
Figure C3-8	Minority Populations, Tacoma Segment.....	C-15
Figure C3-9	Social Resources, Federal Way Segment.....	C-16
Figure C3-10	Social Resources, South Federal Way Segment .....	C-17
Figure C3-11	Social Resources, Fife Segment .....	C-18
Figure C3-12	Social Resources, Tacoma Segment .....	C-19

## Tables

Table C3-1	Study Area Demographic Characteristics.....	C-7
Table C3-2	Race and Ethnicity Characteristics.....	C-7
Table C3-3	Study Area Characteristics – Schools within Project Study Area .....	C-22
Table C4-1	Online and Print Display Advertisements .....	C-29
Table C4-2	Online Meetings with Community-Based Organizations, Fall 2020.....	C-31
Table C4-3	List of Briefings and Interviews.....	C-34
Table C4-4	Community Events .....	C-38
Table C6-1	Summary of Potential Project Impacts and Mitigation .....	C-43

## Acronyms and Abbreviations

ACS	American Community Survey
Belmor	Belmor Mobile Home Park
BMP	best management practice
DOH	Washington State Department of Health
DOT	United States Department of Transportation
EIS	Environmental Impact Statement
EJScreen	Environmental Justice Screening and Mapping
EO	Executive Order
EPA	United States Environmental Protection Agency
Fife Median Alternative	Fife Pacific Highway Median Alternative
FTA	Federal Transit Administration
FW	Federal Way
I-5	Interstate 5
M.O.S.	minimum operable segment
NEPA	National Environmental Policy Act
OMF South	Operations and Maintenance Facility South
Puyallup Tribe of Indians	Puyallup Tribe of the Puyallup Reservation
SEPA	State Environmental Policy Act
SF	South Federal Way
Sound Transit	Central Puget Sound Regional Transit Authority
TDLE	Tacoma Dome Link Extension
USC	United States Code
WSDOT	Washington State Department of Transportation
“X”	the company formerly known as Twitter

## APPENDIX C ENVIRONMENTAL JUSTICE TECHNICAL REPORT

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing the Tacoma Dome Link Extension (TDLE) project to expand the regional light rail system south from the terminus of the Federal Way Link Extension at the Federal Way Downtown Station (opening in 2026) to the Tacoma Dome area near the existing Tacoma Dome Station. The project includes:

- Approximately 10 miles of new dedicated guideway. Most of the guideway would be elevated and there would be no at-grade vehicle or pedestrian crossings. The guideway crosses the ancestral and reservation lands of the Puyallup Tribe of the Puyallup Reservation (Puyallup Tribe of Indians), as well as the cities of Federal Way, Fife, Milton, and Tacoma.
- New stations in South Federal Way and Fife and two in Tacoma (one near E Portland Avenue and one near the Tacoma Dome area).
- A new rail-only fixed-span bridge crossing the Puyallup River.
- New parking facilities with approximately 500 stalls each at the stations in South Federal Way and Fife.

### 1 INTRODUCTION TO RESOURCE AND REGULATORY REQUIREMENTS

This appendix documents the environmental justice analysis conducted for the No-Build and build alternatives for the Sound Transit TDLE project. The analysis defines and describes the minority and low-income populations present in the study area; addresses potential beneficial and adverse project effects to minority and low-income populations; identifies measures to avoid, minimize, or mitigate potential adverse effects; and makes a determination of whether the project has disproportionate and adverse effects on these populations. The appendix also summarizes outreach to minority and low-income populations.

#### 1.1 Regulatory Framework

The environmental justice analysis was performed in compliance with:

- Presidential Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (EO 12898), February 11, 1994.
- U.S. Department of Transportation (DOT) Order on Environmental Justice DOT Order 5610.2C – Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, May 14, 2021.
- DOT Federal Transit Administration (FTA), Circular FTA C 4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients, August 15, 2012 (FTA 2012a).
- Executive Order 14096, Executive Order to Revitalize our Nation's Commitment to Environmental Justice for All, April 21, 2023.

EO 12898 provides that “...each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and

low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Mariana Islands.” The EO addresses the importance of public participation in the review process. EO 14096, Revitalizing Our Nation’s Commitment to Environmental Justice for All, was enacted April 21, 2023. EO 14096 requires agencies to “identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns.” The new EO 14096 on environmental justice does not rescind EO 12898, which has been in effect since February 11, 1994, and is currently implemented through the May 14, 2021, DOT Order 5610.2C. This implementation will continue until further guidance is provided regarding the implementation of the new EO 14096 on environmental justice.

The U.S. DOT issued DOT Order 5610.2(a), which established the procedures to use to comply with EO 12898, to avoid disproportionate and adverse effects on minority and low-income populations. The order has been superseded twice and is now U.S. DOT Order 5610.2C. The DOT order requires agencies to observe the following principles (DOT Order 5610.2C, § 6(b)):

- Planning and programming activities for policies, programs, and activities that have the potential to have a disproportionately high and adverse effect on human health or the environment shall include explicit consideration of the effects on minority populations and low-income populations.
- Steps shall be taken to provide the public, including members of minority populations and low-income populations, access to public information concerning the human health or environmental impacts of programs, policies, and activities, including information that will address the concerns of minority and low-income populations regarding the health and environmental impacts of the proposed action. This includes ensuring that information is made available in languages other than English and in accessible formats for persons with disabilities.

The DOT order further explains that: “In making determinations regarding disproportionately high and adverse effects on minority and low-income populations, mitigation and enhancement measures that would be implemented and all offsetting benefits to the affected minority and low-income populations may be taken into account, as well as the design, comparative impacts, and the relevant number of similar existing system elements in non-minority and non-low-income areas” (DOT Order 5610.2C § 9(b)).<sup>1</sup>

The terms “disproportionate and adverse effect,” “minority persons,” and “low-income persons” are defined in the DOT order:

- **Disproportionate and adverse effect on minority and low-income populations** means an adverse effect that is predominately borne by a minority population and/or a low-income population or will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population (DOT Order 5610.2C, § Appendix 1(g)).

<sup>1</sup> Under EO 14096, agencies will continue their efforts to advance environmental justice in ways that complement and deepen prior work. EO 14096 uses the term “disproportionate and adverse” as a simpler, modernized version of the phrase “disproportionately high and adverse” used in EO 12898. Those phrases have the same meaning but removing the word “high” eliminates potential misunderstanding that agencies should only be considering large disproportionate effects. Link: [FACT SHEET: President Biden Signs Executive Order to Revitalize Our Nation’s Commitment to Environmental Justice for All | The White House.](#)

- **Minority person** means a person who is:
  - Black: a person having origins in any of the Black racial groups of Africa.
  - Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
  - Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
  - American Indian or Alaskan Native: a person having origins in any of the original people of North America and South America (including Central America) and who maintains cultural identification through Tribal affiliation or community recognition.
  - Native Hawaiian and Other Pacific Islander: a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands (DOT Order 5610.2C, Appendix §1(c)).
- **Low-income person** means a person whose household income is at or below the U.S. Department of Health and Human Services poverty guidelines (DOT Order 5610.2C Appendix § 1(b)).

The 2024 poverty guideline for a household of one is \$15,060 annual income and for a household of four is \$31,200 annual income (DHHS 2024). Sound Transit's low-income threshold is two times the federal poverty level, which the agency has determined is appropriate for use in determining eligibility for a reduced fare program and reflects the increasingly high cost of living in the region (Sound Transit 2014b).

In addition to the terms defined in the DOT order, a person with limited English proficiency is defined by the United States Census Bureau as a person who speaks English "less than well." Sound Transit has translated project outreach materials into Spanish, Korean, Vietnamese, Khmer, and Russian.

The following list of federal, state, and local regulations; executive orders; and plans and/or policies were used to guide the assessment of environmental justice effects as part of this analysis:

- Title 49 of the Code of Federal Regulations Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964.
- Title 23 of the United States Code Section 109(h), Federal Highway Administration Effectuation of Title VI of the Civil Rights Act of 1964.
- Presidential EO 13166, Improving Access to Services for Persons with Limited English Proficiency, August 11, 2000 (Presidential EO 2000).
- Presidential EO 13045, Protection of Children from Environmental Health Risks and Safety Risks, April 23, 1997 (Presidential EO 1997).
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended. This act defines the federal regulations governing property acquisition and relocation for federally funded projects.
- FTA, Circular FTA C 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients, October 1, 2012 (FTA 2012b).
- Sound Transit/Washington State Department of Transportation (WSDOT), Re Alignment Issue Paper No. 36, Implementing Environmental Justice Pursuant to Executive Order

12898 and the Department of Transportation Order to Address Environmental Justice in Minority Populations and Low-Income Populations, October 4, 2001 (Sound Transit 2001).

- State of Washington Governor's EO 93-07, September 27, 1993.
- Washington State Department of Transportation Environmental Manual, Chapter 458, Social and Community Effects, and Chapter 460, Environmental Justice (WSDOT 2023).

## 2 METHODS AND APPROACH

Sound Transit conducted the environmental justice analysis for TDLE in compliance with the regulatory framework identified in Section 1.1, including FTA Circular C 4703.1 Chapter II, Conducting Environmental Justice Analysis, to identify, analyze, and address whether the project would result in disproportionate and adverse effects. This includes:

- Creating a residential demographic profile through demographic data to help determine where environmental justice populations are located, including census data and supplemental data, such as elementary school statistics and information collected through community engagement.
- Implementing a targeted public engagement plan that encourages meaningful engagement by all members of the affected communities to inform the environmental justice analysis.
- Identifying the potential for disproportionate burdens on environmental justice versus non-environmental justice populations by comparing the percentage of low-income and minority populations in the study area to the Sound Transit service district average. This is used to understand how the distribution and concentration of minority and low-income populations that could be affected by the project relate to the broader geographic area where Sound Transit provides services. The Sound Transit service district includes the area that would experience impacts and receive benefits of Sound Transit projects and consists of the urbanized areas of King, Pierce, and Snohomish counties that are within the Sound Transit taxing district.
- Identifying adverse effects of the project.
- Analyzing whether adverse effects are disproportionate. This includes wholistic consideration of the project impacts, mitigation, and benefits. The FTA Circular states that "Many public transportation projects involve both adverse effects such as short-term construction impacts, increases in bus traffic, etc., and positive benefits such as increased transportation options, improved connectivity, or overall improvement in air quality. Whether adverse effects will be disproportionately high is dependent on the net results after consideration of the totality of the circumstances."
- Determining whether the adverse effect would be predominately borne by environmental justice populations by considering:
  - Whether the adverse effects on environmental justice populations exceed those borne by non-environmental justice populations.
  - Whether cumulative or indirect effects would adversely affect an environmental justice population.
  - Whether mitigation and enhancement measures will be taken for environmental justice and non-environmental justice populations.
  - Whether there are off-setting benefits to environmental justice populations as compared to non-environmental justice populations.

The environmental justice analysis considers potential project impacts for elements of the environment for the No-Build Alternative and the build alternatives. The impacts include direct construction and operation impacts, indirect impacts, and cumulative impacts. These impacts are assessed according to their likelihood, severity, and duration.

The analysis also includes information about the targeted outreach efforts that Sound Transit has made to involve minority and low-income populations in the project planning and considers measures to avoid, minimize, or mitigate potential adverse impacts. Sound Transit qualitatively assessed whether mitigation measures and project benefits would likely accrue to minority and/or low-income populations and whether they would offset potential adverse impacts (after mitigation measures are applied) to these environmental justice populations. If potential adverse impacts are mitigated and/or the project's benefits effectively offset impacts to low-income and minority populations, the analysis may conclude that there would be no disproportionate and adverse effects on environmental justice populations.

Sound Transit is also implementing a Racial Equity Tool (RET) for TDLE, which is intended to address potential negative impacts to communities of color and the historically marginalized and inform decision-making related to the Project. The RET process overlaps with and complements this NEPA environmental justice analysis and was applied as summarized in Section 5, Racial Equity Tool Process.

## **2.1 Data Sources**

The environmental justice analysis includes a description of the demographics of the TDLE study area using the most recent U.S. Census data available at the time of the analysis. The analysis used 2017 to 2021 American Community Survey (ACS) data at the census block group level for minority, low-income, and limited English proficiency populations in the study area.

Available datasets from the U.S. Environmental Protection Agency (EPA) EJScreen (Environmental Justice Screening and Mapping) and the Council on Environmental Quality's Climate and Economic Justice Screening tool were used to validate environmental justice characteristics in the study area (EPA 2022).

Elementary school data were reviewed as another source of information and used to enhance Sound Transit's understanding of the communities surrounding the project. The analysis primarily used elementary school data because elementary school attendance areas are geographically smaller than middle or high school attendance areas and thus better represent the project study area with which they overlap. However, due to the limited number of elementary schools within the study area, high school data were used to supplement available elementary school data. Data used came from the 2022-2023 school year Washington State Report Card.

The Washington State Department of Health (DOH) Environmental Health Disparities Map (DOH 2022) was also reviewed. The map is an interactive tool that ranks the health disparities for each census tract, based on 19 indicators related to environmental exposures, environmental effects, sensitive populations, and socioeconomic factors. The data underlying those 19 indicators are combined into a cumulative score reflecting environmental and socioeconomic risk factors that allows for comparison among Washington's census tracts, with a score of 10 being the highest risk and 1 being the lowest.

Sound Transit also conducted interviews with social service providers to better understand the populations in the study area. These interviews also informed the outreach strategy to engage populations that are traditionally hard to reach.



## 2.2 Study Area

The study area for the environmental justice analysis extends 0.5 mile from the TDLE footprint and construction areas. This study area is sized to allow the project team to identify potentially affected populations or community resources that could be subject to project impacts. This 0.5-mile distance also represents the typical walking distance residents and workers might cover to access the proposed transit stations and captures areas where residents and communities would experience the benefits of improved access to transit, as well as where there are potential impacts to the built environment surrounding the project. These study area neighborhoods have social resources that provide residents with many opportunities to interact and develop a sense of community cohesion. Additional information on the location of these social resources and community cohesion within the study area can be found in Section 4.4, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods, of the Draft Environmental Impact Statement (EIS).

This analysis describes demographics and study area characteristics for each of the TDLE alternatives. TDLE alternatives extend through the cities of Federal Way, Milton, Fife, and Tacoma, and a portion of the Pierce County. All the TDLE alternatives would also cross the ancestral and reservation lands of the Puyallup Tribe of Indians and the Puyallup River.

## 3 STUDY AREA DEMOGRAPHICS

Readily available ACS data and school data were analyzed to assess the demographic composition of minority and low-income populations and to capture other key demographic information of the population located within the study area for each of the project build alternatives.

In addition to ACS data, available datasets from the U.S. Environmental Protection Agency (EPA) EJScreen (Environmental Justice Screening and Mapping) and the Council on Environmental Quality's Climate and Economic Justice Screening tool were used to validate environmental justice characteristics in the study area. The EJScreen reports are included in Attachment A.

### 3.1 Study Area Characteristics

Table C3-1 and Table C3-2 summarizes study area demographic characteristics from ACS data for each of the project segments and compares them with those of the cities of Federal Way, Fife, Tacoma, and Milton, as well as King and Pierce counties and the Sound Transit District as a whole. The purpose of these comparisons is to understand how the distribution and concentration of minority and low-income populations could be affected by the proposed build alternatives and how they relate to the broader geographic area where Sound Transit provides transit service. For example, the percentage minority population and low-income persons in each of the TDLE segments is higher than the Sound Transit District as a whole. Survey data from 2018 to 2019 identified that approximately 43 percent of Sound Transit ridership across all modes (Link light rail, Regional Express bus, and Sounder) are from minority groups, many of whom use transit for more than commuting purposes (Sound Transit 2022a and 2022b).

Geographic information system maps were also developed to show minority and income characteristics of the population within each study area (Figures C3-1 through C3-8) and identify existing affordable housing, which is housing that is affordable to those earning 80 percent or less of the area median income for the county. Section 4.4, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods, of the Draft EIS also describes social resources in the study area, many of which could be used by minority and low-income populations. Those social resources are shown in Figures C3-9 through C3-12.

**Table C3-1 Study Area Demographic Characteristics<sup>1</sup>**

	Total Population	Minority Population <sup>2</sup>	Low-Income Persons <sup>3</sup>	Households with Limited English Proficiency <sup>4</sup>	Median Household Income
<b>Sound Transit District</b>					
	3,268,710	42% <sup>5</sup>	20% <sup>5</sup>	6% <sup>5</sup>	\$105,671
<b>Segment</b>					
Federal Way	20,833	67%	33%	13%	\$62,520
South Federal Way	31,401	50%	25%	7%	\$81,688
Fife	18,899	50%	29%	6%	\$79,485
Tacoma	19,351	51%	39%	4%	\$56,727
<b>City</b>					
City of Federal Way	99,792	60%	29%	8%	\$72,969
City of Fife	10,869	57%	26%	5%	\$75,557
City of Tacoma	217,332	43%	28%	4%	\$69,956
City of Milton	8,501	28%	19%	2%	\$81,690

Source: U.S. Census Bureau, ACS 2017-2021 5-Year Estimates (2022).

Notes:

- (1) Percentages represent estimates based on survey data. Survey data are not available at the census-block level; the data represent an estimate of minority and low-income persons in block groups within 0.5 mile of each build alternative.
- (2) Minority is defined as all but Non-Hispanic White Alone.
- (3) Low-income is defined as the percentage of a block group's population in households where the household income is less than or equal to twice the federal poverty level.
- (4) A person with limited English proficiency is defined by the U.S. Census Bureau as a person who speaks English "less than well."
- (5) 2020 5-Year American Community Survey.

**Table C3-2 Race and Ethnicity Characteristics<sup>1</sup>**

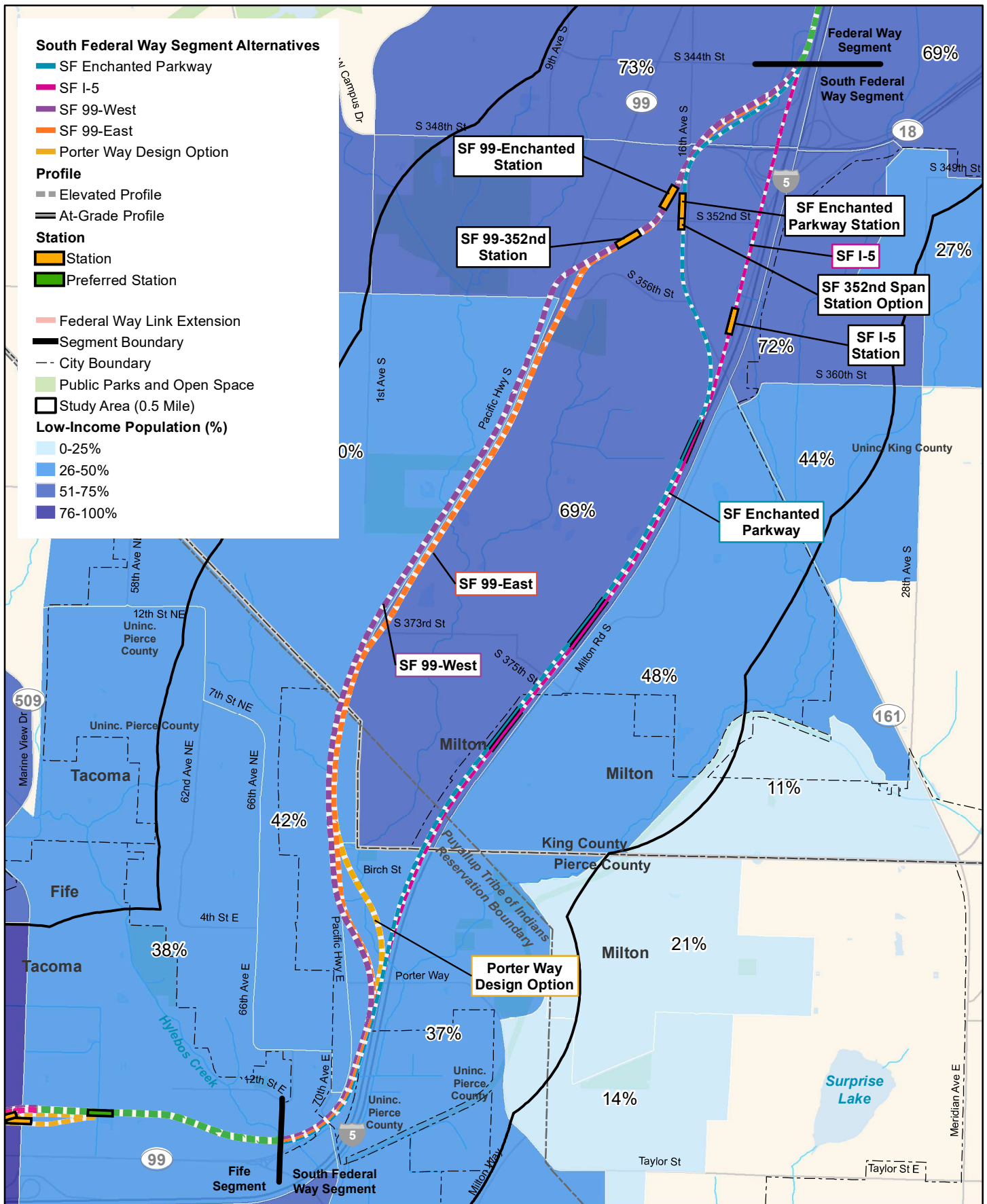
	Black or African American	Hispanic or Latino	Asian	American Indian and Native Alaskan	Native Hawaiian/ Pacific Islander	Two or More Races and Other
<b>Sound Transit District<sup>2</sup></b>						
	7%	11%	16%	1%	1%	7%
<b>Segment</b>						
Federal Way	20%	19%	15%	<1%	3%	10%
South Federal Way	12%	13%	12%	1%	3%	11%
Fife	8%	17%	10%	3%	4%	8%
Tacoma	9%	19%	8%	3%	2%	9%
<b>City</b>						
City of Federal Way	17%	17%	14%	1%	2%	9%
City of Fife	11%	16%	14%	2%	6%	8%
City of Tacoma	10%	12%	9%	1%	1%	10%
City of Milton	1%	11%	8%	<1%	1%	7%

Source: U.S. Census Bureau, ACS 2017-2021 5-Year Estimates (2022).

Notes:

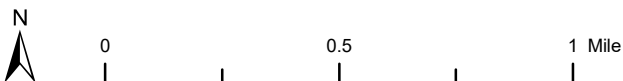
- (1) Percentages represent estimates based on survey data. Survey data are not available at the census-block level; the data represent an estimate of minority and low-income persons in block groups within 0.5 mile of each build alternative.
- (2) 2020 5-Year American Community Survey.



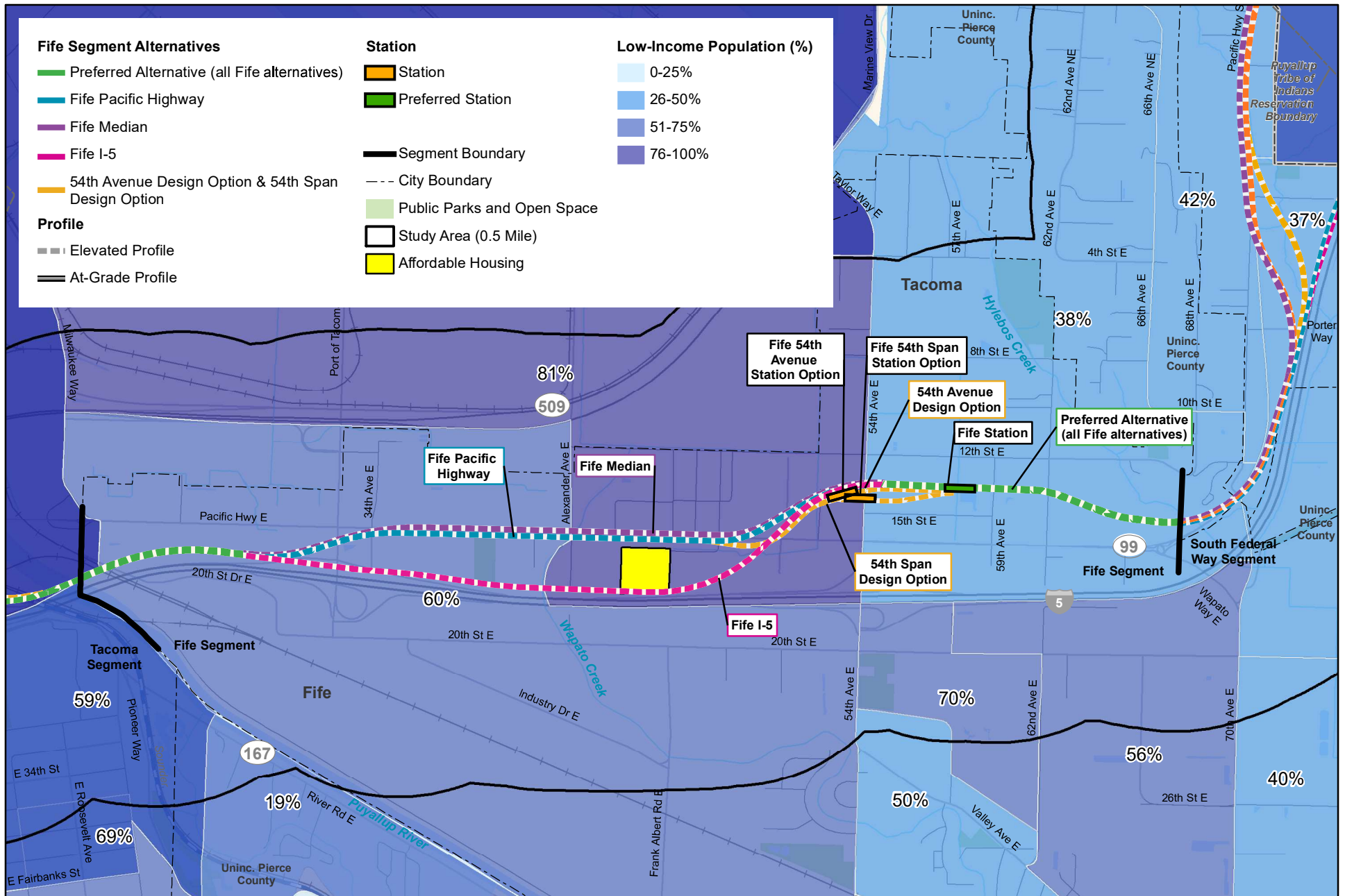


Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).

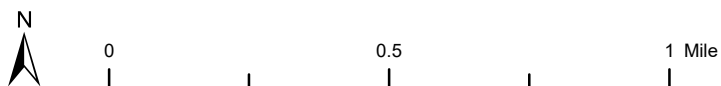
**FIGURE C3-2**  
 Low-Income Populations  
 South Federal Way Segment  
 Tacoma Dome Link Extension



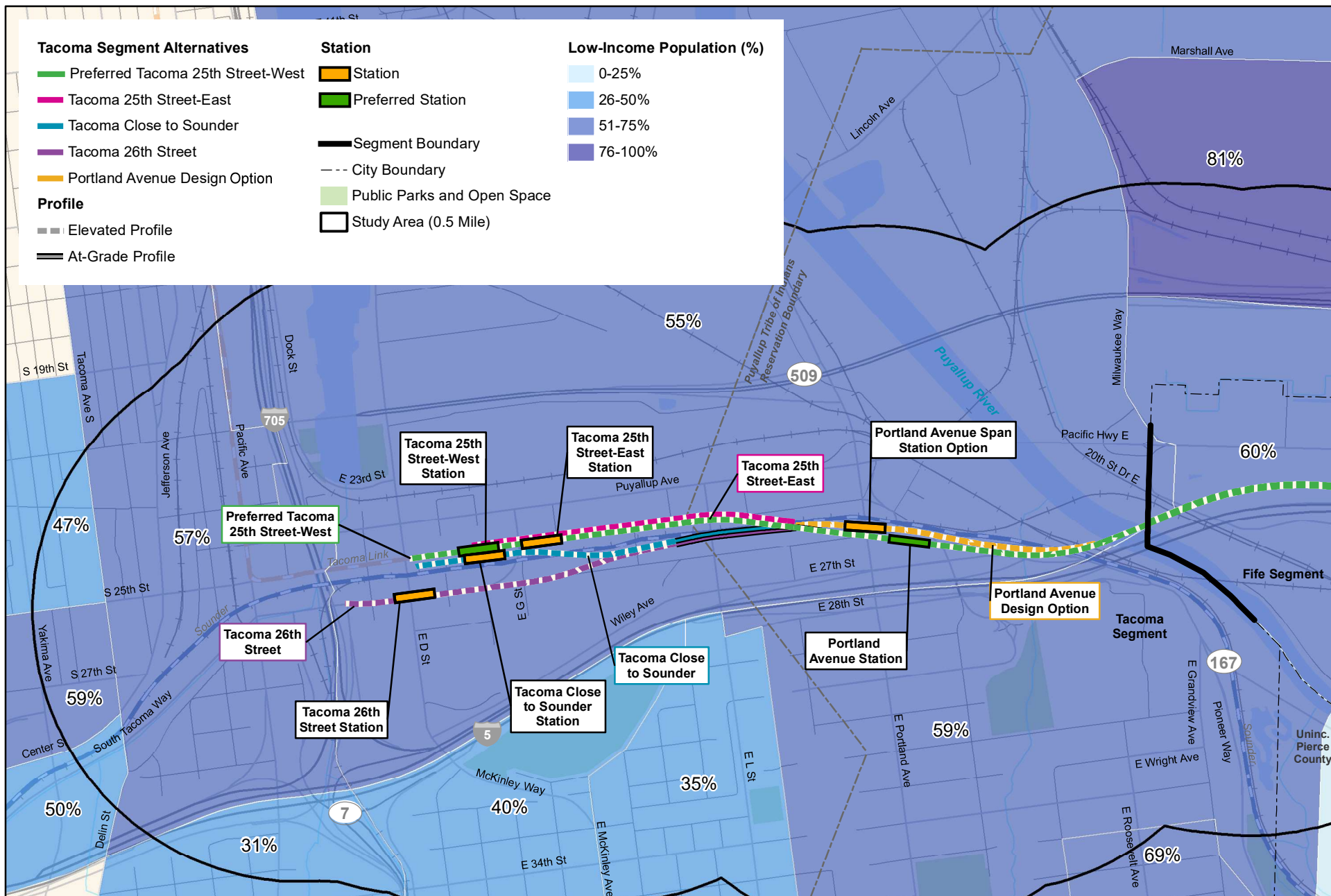




Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).

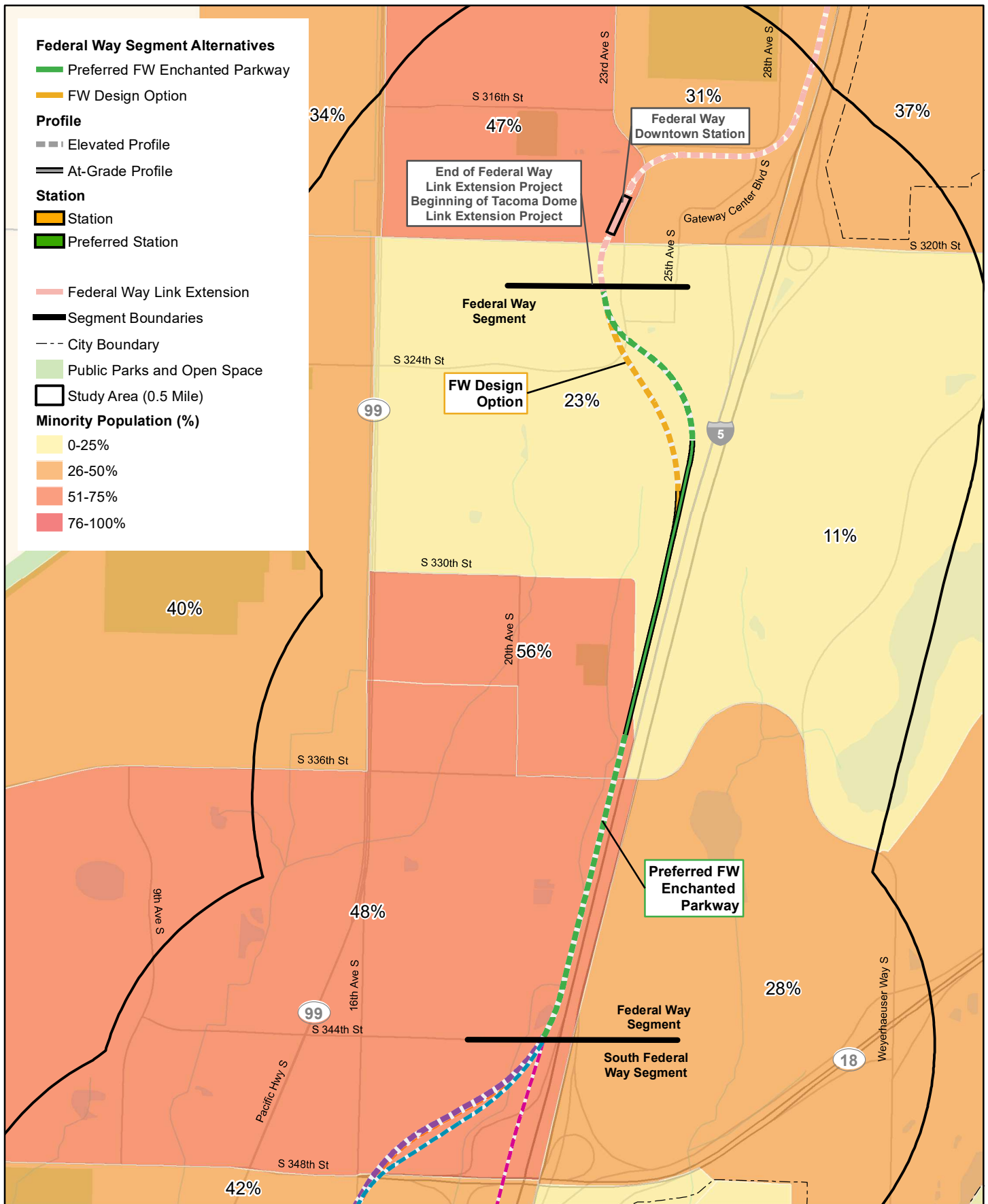


**FIGURE C3-3**  
Low-Income Populations  
Fife Segment  
Tacoma Dome Link Extension

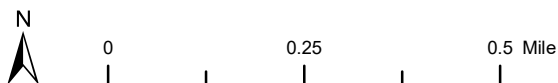


Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).

**FIGURE C3-4**  
 Low-Income Populations  
 Tacoma Segment  
 Tacoma Dome Link Extension

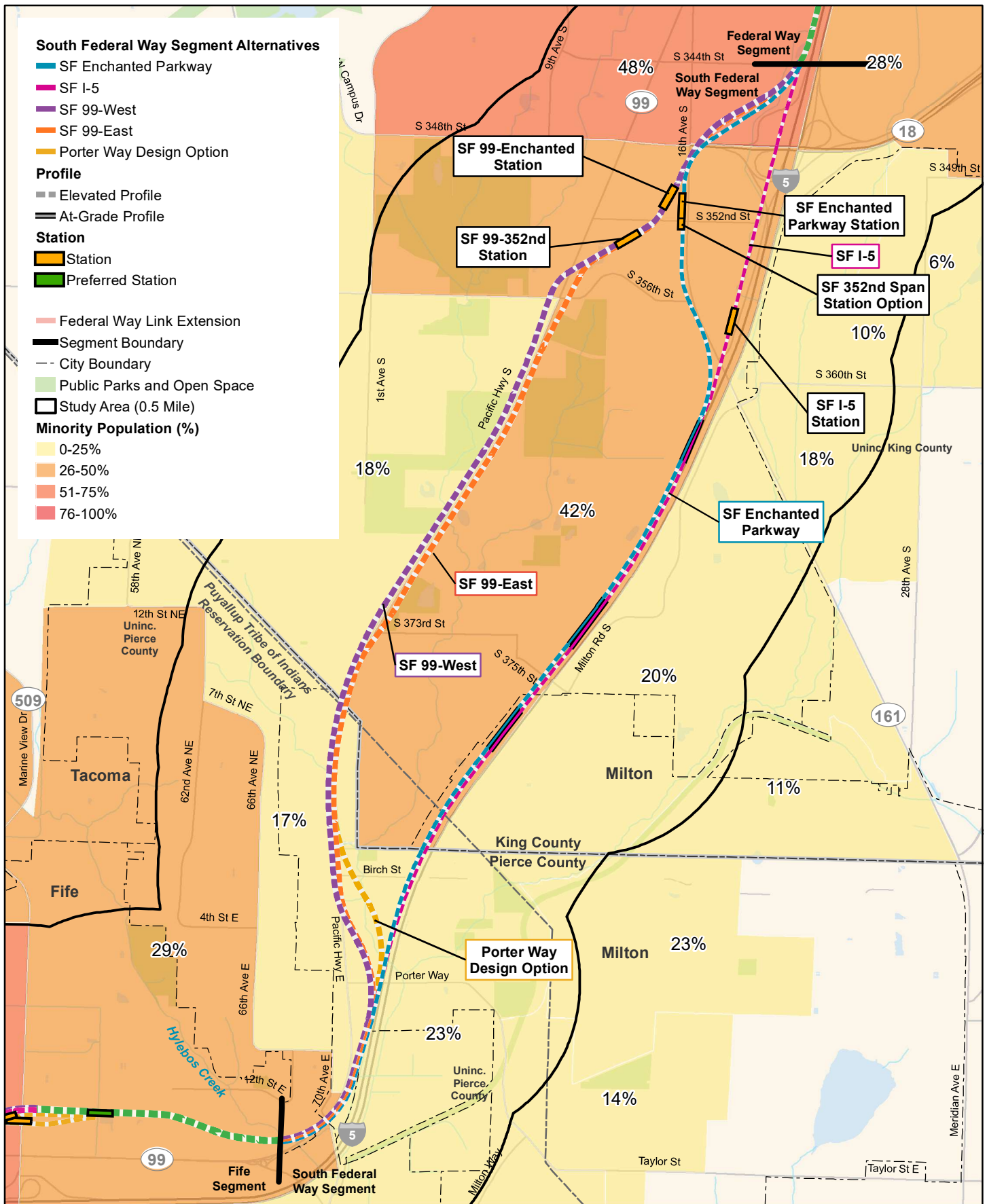


Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).

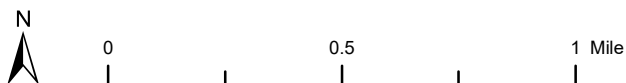


**FIGURE C3-5**  
 Minority Populations  
 Federal Way Segment  
 Tacoma Dome Link Extension

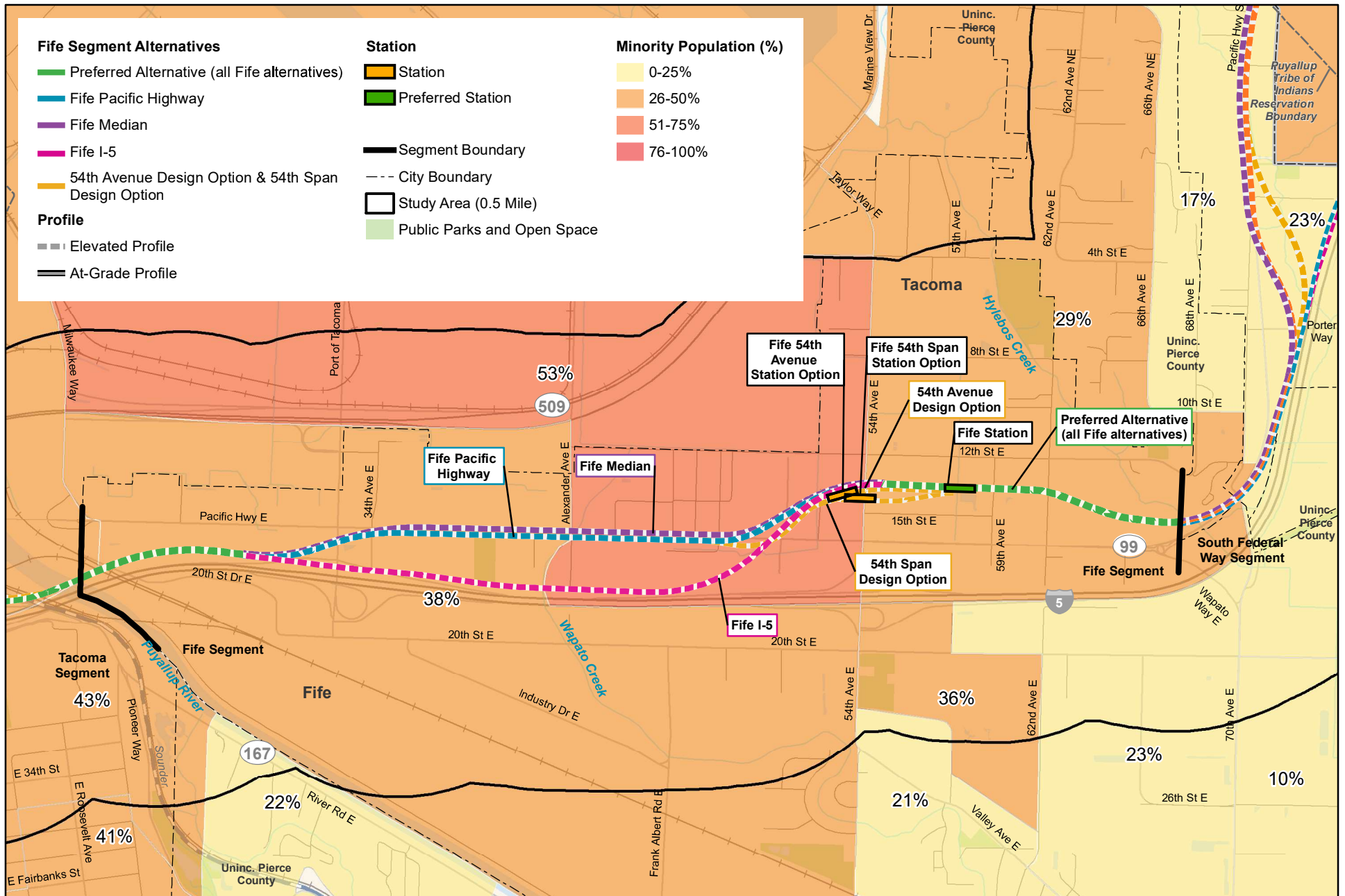




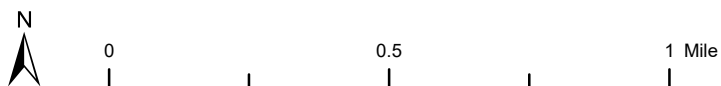
Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE C3-6**  
 Minority Populations  
 South Federal Way Segment  
 Tacoma Dome Link Extension



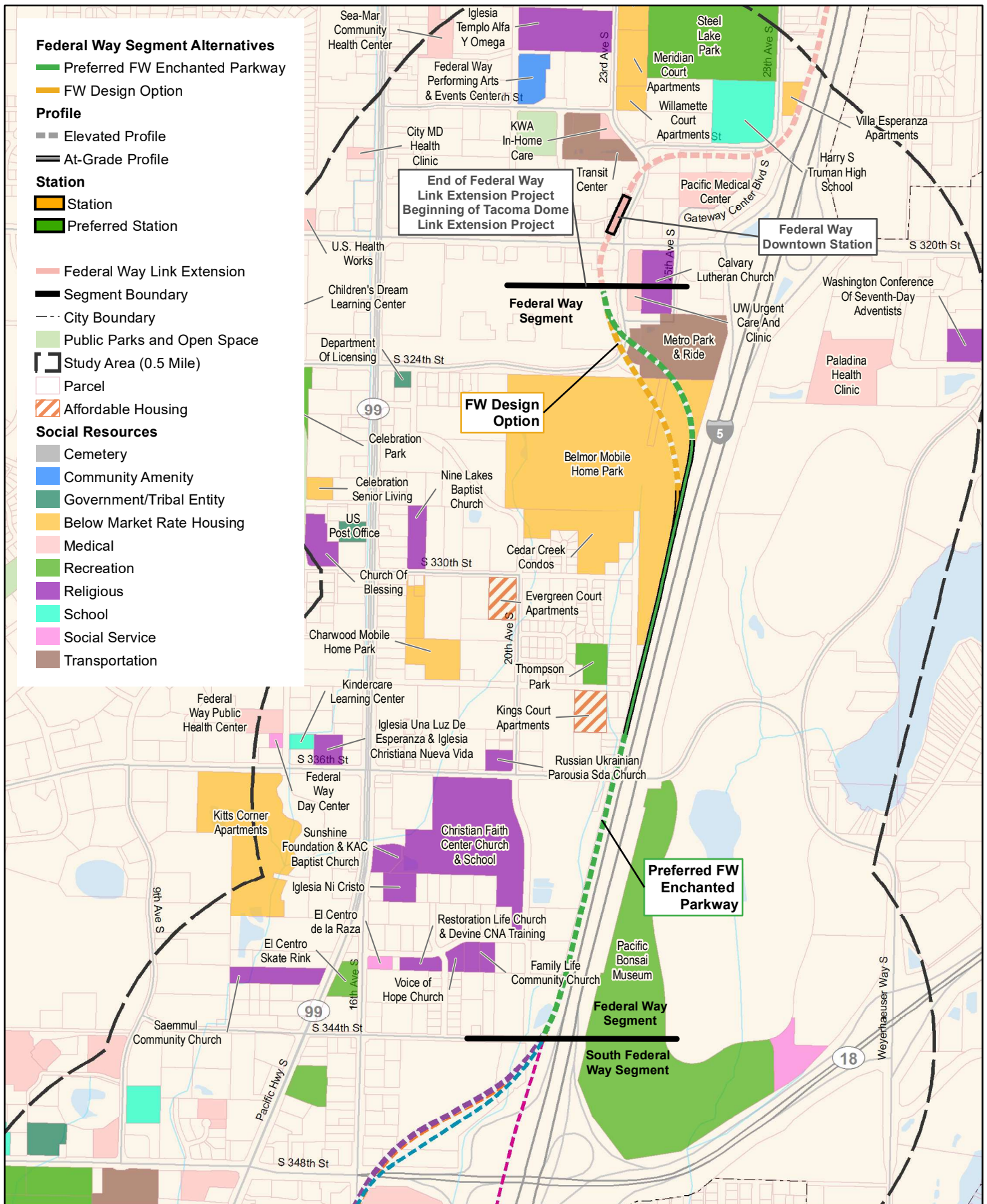
Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE C3-7**  
 Minority Populations  
 Fife Segment  
 Tacoma Dome Link Extension

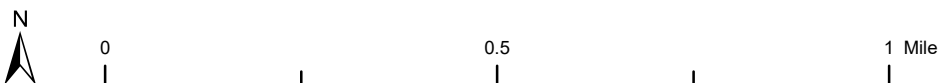


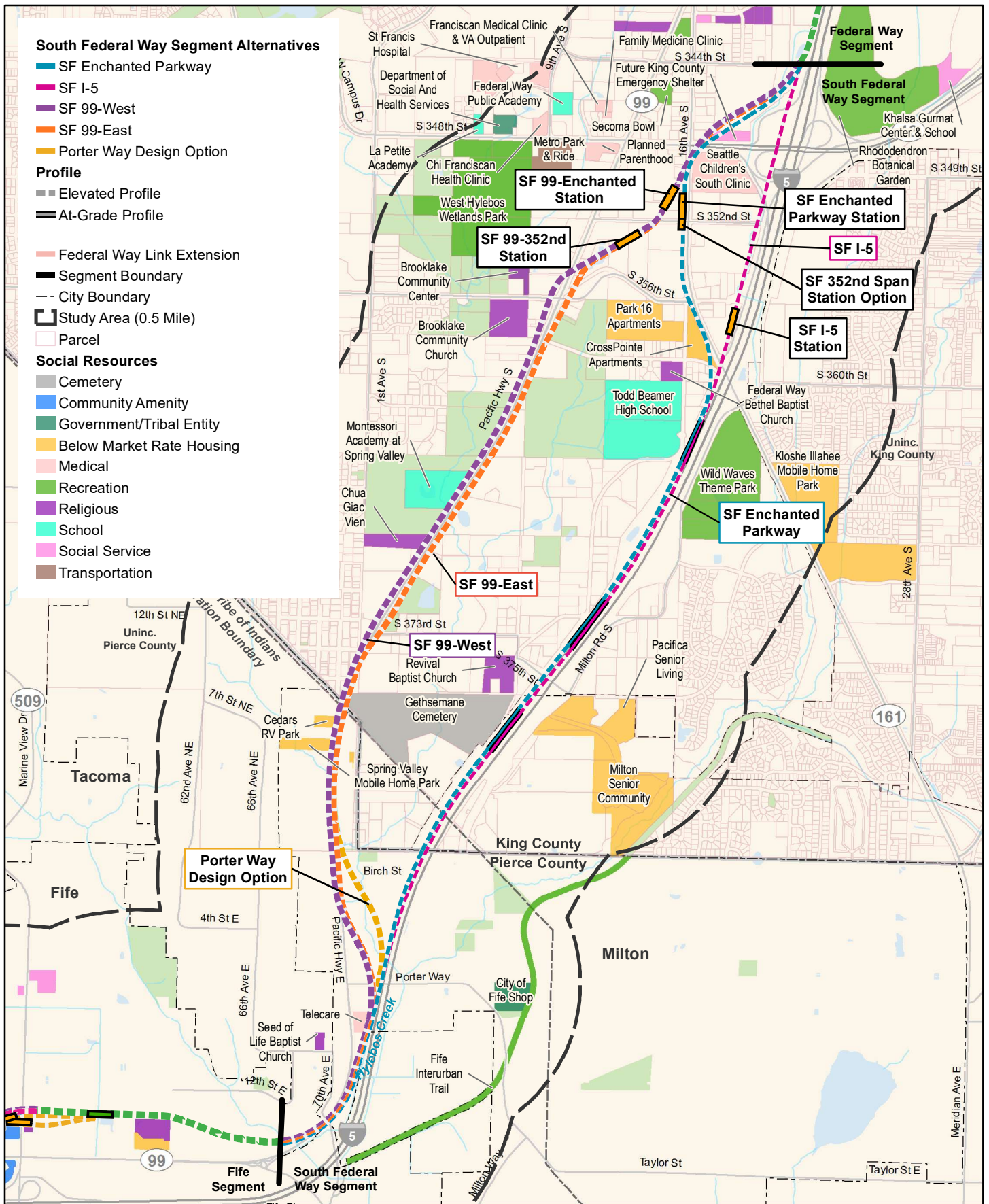




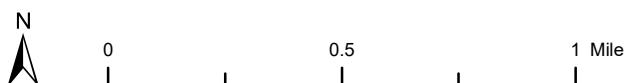
Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).

**Figure C3-9**  
Social Resources Study Area  
Federal Way Segment  
Tacoma Dome Link Extension





Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).

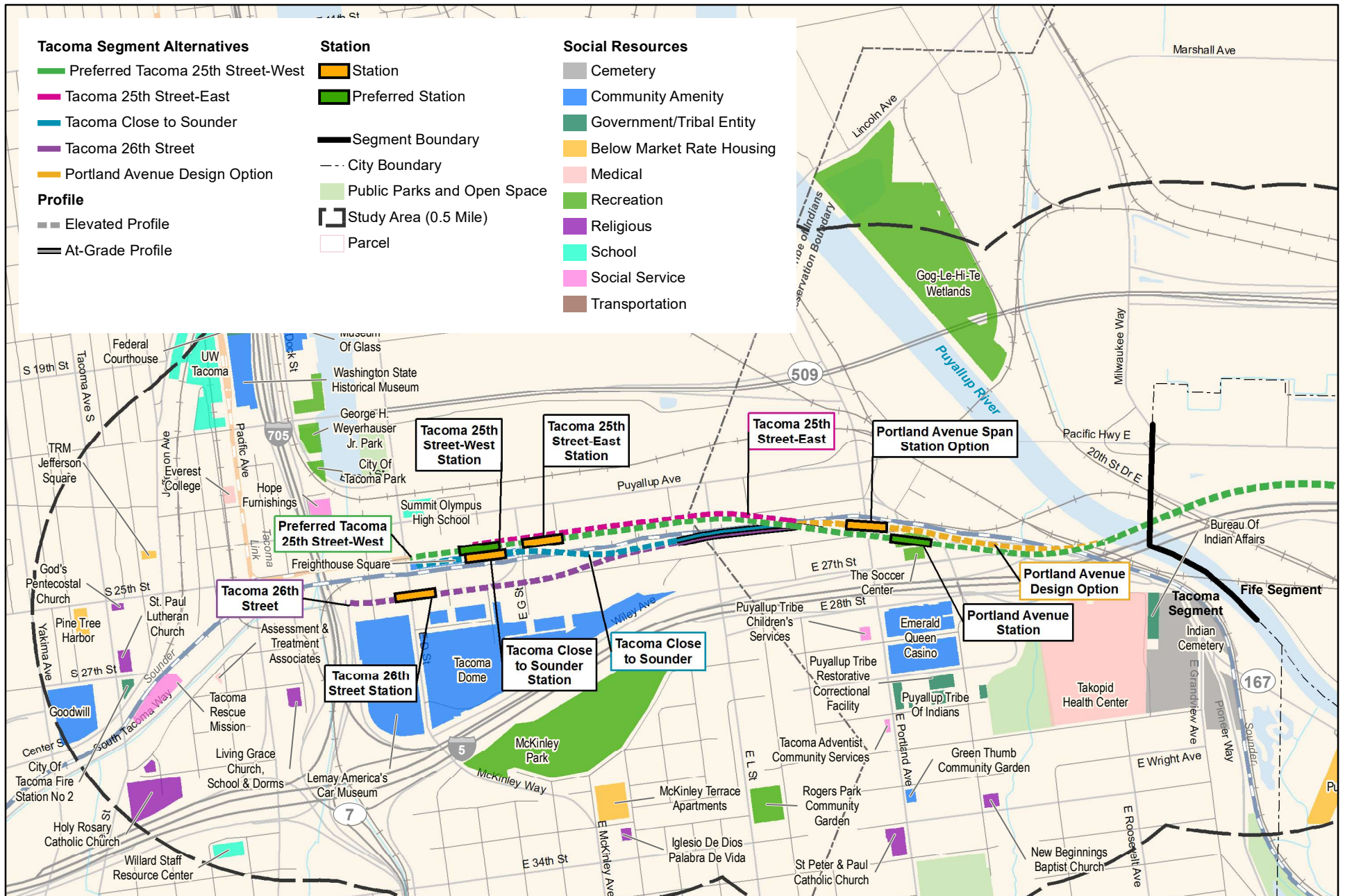


**Figure C3-10**  
Social Resources Study Area  
South Federal Way Segment  
Tacoma Dome Link Extension

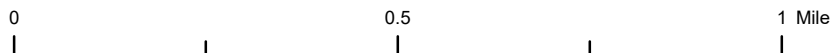




**FIGURE C3-11**  
Social Resources Study Area  
Fife Segment  
*Tacoma Dome Link Extension*



Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE C3-12**  
Social Resources Study Area  
Tacoma Segment  
Tacoma Dome Link Extension



### 3.1.1 Federal Way Segment

The study area for the Federal Way Segment includes approximately 20,800 residents. Of these residents, approximately 33 percent are reported as low-income, and 67 percent are reported as minorities. The Preferred FW Enchanted Parkway, with or without the design option, shares a similar footprint such that the affected area for each of these alternatives is characterized by the same demographic information. Key findings for the Federal Way Segment include:

- The proportion of minority persons within the study area (67 percent) is the highest of the four segments, 7 percent higher than the share for the City of Federal Way as a whole (60 percent), and 25 percent higher than the Sound Transit District as a whole (42 percent).
- The proportion of low-income persons within the study area (33 percent) is 4 percent higher than the City of Federal Way as a whole (29 percent) and 13 percent higher than the Sound Transit District as a whole (20 percent).
- Households with limited English proficiency make up 13 percent of all households in the Federal Way Segment, 5 percent higher than within the City of Federal Way (8 percent) and 7 percent higher than the Sound Transit District as a whole (6 percent).
- The Federal Way Segment has a high environmental health disparity ranking (rank 10, the highest ranking) on the DOH Environmental Health Disparities Map.

### 3.1.2 South Federal Way Segment

The study area for the South Federal Way Segment includes approximately 31,400 residents. Of these residents, approximately 25 percent are reported as low income and 50 percent are reported as minorities. All of the alternatives and design options would affect areas that are characterized by the same demographic information, regardless of the difference in location relative to Pacific Highway and Interstate 5 (I-5). Key findings for the South Federal Way Segment include:

- The proportion of minority persons within the study area (50 percent) is 10 percent lower than the share for the City of Federal Way as a whole (60 percent) and 8 percent higher than the proportion of minority persons in the Sound Transit District as a whole (42 percent).
- The proportion of low-income persons within the study area (25 percent) is 4 percent lower than the share for the City of Federal Way as a whole (29 percent) and 5 percent higher than the Sound Transit District as a whole (20 percent).
- The South Federal Way Segment includes the greatest overall number (in nominal terms) of low-income and minority persons (7,689 and 15,712 persons, respectively) of the three TDLE segments.
- Households with limited English proficiency make up 7 percent of all households in the South Federal Way Segment, similar to the City of Federal Way (8 percent) and the Sound Transit District as a whole (6 percent).
- The South Federal Way Segment has a high environmental health disparity ranking on the DOH Environmental Health Disparities Map (rank 8 at the northern end of the segment, rank 7 along a portion of the alternatives in Milton, and rank 9 at the southern end of the segment).

### 3.1.3 Fife Segment

The study area for the Fife Segment includes approximately 18,900 residents. Of these residents, approximately 29 percent are reported as low income and 50 percent are reported as minorities. All of the alternatives and design options in the Fife Segment share similar footprints such that the affected area for each of these alternatives is characterized by the same demographic information. Therefore, the share of low-income and minority persons residing within the study area for each of these alternatives is the same. Key findings for the Fife Segment include:

- The proportion of minority persons within the study area (50 percent) is 7 percent lower than the share for the City of Fife as a whole (57 percent) and 8 percent higher than the Sound Transit District as a whole (42 percent).
- The proportion of low-income persons within the study area (29 percent) is 3 percent higher than the share for the City of Fife as a whole (26 percent) and 9 percent higher than the Sound Transit District as a whole (20 percent).
- Households with limited English proficiency comprise 6 percent of all households in the Fife Segment, slightly more than the City of Fife as a whole (5 percent) the same as the Sound Transit District as a whole (6 percent).
- The Fife Segment has a high environmental health disparity ranking on the DOH Environmental Health Disparities Map (rank 9).

### 3.1.4 Tacoma Segment

The study area for the Tacoma Segment represents approximately 19,350 residents. On average, approximately 39 percent of all residents within the study area in the Tacoma Segment are reported as low-income and 51 percent are reported as minorities.

All of the alternatives in the Tacoma Segment share similar footprints such that the affected area for each of these alternatives is similar. The Tacoma 25th Street-East Alternative has a slightly lower low-income population and a slightly higher minority population than the other alternatives, but the difference is less than 1 percent. As shown in Table C3-1, key findings for the Tacoma Segment include:

- The study area in the Tacoma Segment includes the greatest proportion of low-income residents as compared with the other TDLE Segments.
- The proportion of minority persons within the study area (51 percent) is 8 percent higher than the share for the City of Tacoma (43 percent) and 9 percent higher than the Sound Transit District as a whole (42 percent).
- The proportion of low-income (39 percent) populations living within the Tacoma Segment study area is 11 percent higher than the City of Tacoma as a whole (28 percent) and 19 percent higher than the Sound Transit District as a whole (20 percent).
- Households with limited English proficiency within the study area (4 percent) is the same as the City of Tacoma as a whole (4 percent) and 2 percent lower than the Sound Transit District as a whole (6 percent).
- The Tacoma Segment has a high environmental health disparity ranking on the DOH Environmental Health Disparities Map (rank 10, the highest ranking).

## 3.2 Study Area Schools

The TDLE study area is served by Tacoma, Federal Way, and Fife public schools. Federal Way Head Start and the Internet Academy are the only two public elementary schools within the TDLE study area. Several other private and charter schools are also within the study area but were not included as part of the demographic analysis, as data are not readily available for these private schools. Because elementary schools are limited in the study area, high school data were also considered. There are four high schools within the study area: Todd Beamer High School, Harry S. Truman High School, Fife High School, and Summit Olympus High School (charter school). Table C3-3 summarizes study area characteristics for public schools within the study area.

**Table C3-3 Study Area Characteristics – Schools within Project Study Area**

School	Enrollment (2019-2020)	Percent Identifying as Race Other Than White	Percent Hispanic (of any race)	Percent Low- Income	Percent English Language Learners <sup>2</sup>
<b>Federal Way Segment</b>					
No public schools in this segment.	N/A	N/A	N/A	N/A	N/A
<b>South Federal Way Segment</b>					
Federal Way Head Start <sup>1</sup>	106	85%	41%	73%	0%
Internet Academy <sup>1</sup>	224	51%	23%	35%	3%
Todd Beamer High School	1,496	72%	24%	61%	15%
Career Academy at Truman High School	98	85%	46%	85%	18%
<b>Fife Segment</b>					
Fife High School	870	53%	20%	43%	10%
<b>Tacoma Segment</b>					
Summit Olympus High School	183	73%	24%	71%	6%

Source: Washington State Office of Superintendent of Public Instruction (OSPI) 2023; Washington State Report Card district-level data.

Notes:

- (1) Elementary population is defined as pre-K through Grade 6.
- (2) English language learners are students who live in homes where another language is the primary language spoken or who learned another language before English.

English language learners are reported at the school level as a comparison with Census-reported limited English proficiency populations in the study area. To provide further perspective on concentrations of minorities in the study area, proportions of non-white and Hispanic students as compared with total enrollments are reported at the school level.

Across all schools in the study area, the proportion of minority, Hispanic, and low-income students is higher than minority, Hispanic, and low-income populations reported by ACS data. The exceptions to this are the Internet Academy, which has proportions of low-income student populations that are similar to the South Federal Way Segment ACS demographic data, and Summit Olympus High School, which has proportions of Hispanic populations that are similar to the Tacoma Segment ACS data. Percentages of students reported as English language learners for all schools in the study area are also higher than limited English proficiency populations identified in the study area, except for Federal Way Head Start and Internet

Academy. These two schools have smaller proportions of English language learners than the proportions of limited English proficiency populations identified by ACS data.

These findings suggest that younger populations within the study area may be more diverse than the population as a whole shown in Table C3-1.

## 4 OUTREACH TO MINORITY AND LOW-INCOME POPULATIONS

Sound Transit conducted public outreach during the TDLE Early Scoping period, during the National Environmental Policy Act (NEPA)/State Environmental Policy Act (SEPA) Scoping Period, and also through targeted outreach efforts during the preparation of the Draft EIS.

Sound Transit's community engagement procedures, EO 12898 and EO 14096, U.S. DOT Order 5610.2C, and FTA Circular C 4703.1 require Sound Transit to provide meaningful opportunities for minority, low-income, and limited English proficiency groups to engage in the planning process. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin. These directives make environmental justice a part of the decision-making process by identifying and addressing disproportionate and adverse human health and environmental effects of Sound Transit's programs, policies, and activities on minority and low-income populations. Sound Transit conducted a preliminary demographic analysis to identify low-income, minority, and limited English proficiency populations.

Based on this analysis, Sound Transit provided project literature in Spanish, Korean, Vietnamese, Khmer, and Russian. Spanish, Cambodian, Korean, and Vietnamese interpreters were available at East Tacoma events.

Sound Transit engages with social service providers, community leaders and organizations, and other representatives through targeted outreach efforts. Through these efforts, the project team can share project information, build relationships with the community, and explain how environmental justice populations may experience adverse impacts or benefits from the project. Sound Transit is using several types of targeted outreach, including:

- **Briefings:** Sound Transit met with representatives of individual communities or organizations to provide a project update, answer questions, and learn more about individual circumstances and better ways to engage with their community. Attention and care have been taken to meet people in locations where they may be more comfortable engaging with government agencies. This has included presence with in-language lunch groups (Korean, Spanish, Cambodian, and Vietnamese) and collaboration with groups for translation services, as well as serving meals and engaging with community groups in the spirit of building relationships and collective understanding of perspectives. Briefings were adapted to meet the needs of specific audiences, including presentation content, as well as interpretation/translation.
- **Open houses:** Sound Transit chose locations and times that were accessible for the audiences within the project corridor. At open houses, project outreach staff set up tables of materials and resources, answered questions and participated in facilitated conversations. At TDLE-focused open houses, project staff often present a brief overview of the project to provide background and availability for translation was advertised.
- **Fair or festival booths:** Project staff attended fairs, festivals, and community/cultural celebrations in the project area (Federal Way, Fife, Milton, and Tacoma) to distribute project information and answer questions from the general public. Outreach staff hosted a Sound

Transit booth with project-specific materials and general South Puget Sound materials. Booths were open to the public and provided basic information as well as a chance to discuss specific questions in detail.

- **Tabling and drop-in sessions:** Project outreach provided project information and updates and answered questions at community spaces, including transit centers, UW Tacoma, grocery stores, and community centers to reach a wider audience. These tabling sessions were held on multiple days and at various times (weekdays/weekends, daytime, evening) to meet varying schedules of community members. Events were open to the public and provided basic information as well as a chance to discuss specific questions in detail.
- **Listening sessions:** The project staff has hosted a listening session in East Tacoma to learn more about the community members' vision for the area and potential barriers to transit access and to hear feedback on alternatives. Sound Transit provided interpreters in Cambodian, Spanish, and Vietnamese for this event.
- **Stakeholder interviews:** The project team conducted a series of interviews with social service organizations and community advocacy groups in the project area to understand their preferred methods of engagement, establish relationships, and introduce them to the TDLE project.
- **Outreach toolkits:** The project team distributed outreach toolkits to social service organizations along the project corridor to encourage sharing of information by trusted leaders with their audiences during outreach periods and to generate additional feedback. The toolkits included project emails, posters, factsheets, Facebook posts, and "X" (formerly Twitter) posts for organizations to post and share.

In addition, individuals interested in receiving project information can sign up to receive periodic project updates through email. Sound Transit maintains a database of individuals who have made a request to receive updates on project progress and opportunities for public input using a GovDelivery listserv. The listserv includes email addresses and/or physical addresses of open house attendees, drop-in session attendees, correspondents, commenters, and other interested individuals. In addition to the listserv, Sound Transit uses a mailing list of over 50,000 addresses in the project area for project related mailings.

A complete summary of public outreach efforts is documented in Appendix B, Public Involvement and Agency Coordination, of the Draft EIS.

Sound Transit has received comments expressing the desire for minority engagement throughout the planning process, as well as concern about potential project impacts to environmental justice populations, including:

- Residential displacement among historically disadvantaged populations.
- Displacement of minority-owned businesses.
- Construction impacts to minority-owned businesses.
- Impacts to tribal land and water resources.
- Noise impacts, particularly during construction.
- Impacts to neighborhood cohesion.
- Affordable housing.

In addition to concerns about potential project impacts, additional comments received during targeted minority and low-income outreach include interest in:

- Station accessibility from other modes of transportation.
- Connections to important regional destinations and job centers.
- Contractors or workers building the project who are representative of the local community.
- Safety for those walking to and from stations at night.
- Accessibility for people with disabilities around the station area.
- Improvements to the pedestrian experience around the proposed Portland Avenue Station.
- Potential impacts to the St. Paul Chong Hasang Church, located in the Fife Segment, such as construction and operational noise and vibration impacts, the potential acquisition or displacement of residents (priest and nuns) on the property, and concern around the impact to the safety and security of parishioners due to the proximity of a potential station.

## **4.1 SEPA Early Scoping Outreach**

Early scoping under SEPA provided the public an opportunity to comment on the route (alignment), stations, potential benefits, and impacts for TDLE and the draft Purpose and Need Statement. Early scoping was held April 2 through May 3, 2018.

To support early scoping, Sound Transit held three community open houses in Tacoma, Federal Way, and Fife. For open houses, Sound Transit chose locations and times that were accessible for the audiences within the project corridor. At open houses, project outreach staff set up tables of materials and resources, answered questions, and participated in facilitated conversations. In-person open houses were held:

- Open House – Tacoma  
Tuesday, April 17, 2018, 6 p.m. – 8 p.m.  
Best Western Plus Tacoma Dome Hotel, 2611 East E Street
- Open House – Federal Way  
Wednesday, April 18, 2018, 6 p.m. – 8 p.m.  
Todd Beamer High School, 35999 16th Avenue S
- Open House – Fife  
Tuesday, April 24, 2018, 6 p.m. – 8 p.m.  
Fife Community Center, 2111 54th Avenue E

An online open house was available from April 2, 2018, to May 3, 2018, for members of the public who were unable to attend the in-person meetings to review and provide feedback on the representative alignment. All information and materials presented at the in-person open houses were available online. The site offered a project overview, an explanation of the early scoping process, the project purpose and need, representative alignments, and plans for public engagement throughout the project. It also provided “translation widget” buttons to offer the option for users to translate content.

Public comments were accepted in various ways, including email, online open house, open house comment forms, and mail. In addition, an interactive map tool in the online open house allowed users to place notes at specific locations on a map, and users could indicate if they liked or disliked other commenters’ notes. Similarly, at the community open houses, attendees placed Post-it® notes with their input on large maps.



These activities were advertised with:

- Mailer notifications sent to 52,160 homes, apartments, and businesses.
- Two news releases on April 2 and April 16, 2018.
- Online and print ads in 12 local online and print publications.
- Posters distributed to 150 different locations between Kent and Tacoma (included translated versions in Spanish, Korean, Vietnamese, Khmer, and Russian).
- Facebook and “X” ads that reached 30,047 subscribers and 81,500 followers.
- Five project email updates sent to approximately 5,300 recipients on April 2, April 12, April 16, April 24, and May 2, 2018.

To reach minority populations, advertisements were published in *El Siete Dias*, *Korea Daily*, *Korean Times Seattle*, *Northwest Vietnamese News*, and *Tu Decides*.

## **4.2 September 2018 Outreach Activities**

Between early scoping and scoping outreach, Sound Transit focused on inclusive outreach with community groups, organizations, residents, businesses, and underrepresented populations along the project corridor who do not typically participate in traditional in-person and online open houses. Outreach efforts were geared towards equitable engagement and reaching potential future riders. Sound Transit provided translated text in Spanish, Korean, Vietnamese, Khmer, and Russian for advertisements, project information, and the online open house.

Sound Transit shared project updates and sought feedback on the initial route and station concepts that were developed in early scoping. Sound Transit asked members of the public to comment on the potential for route and station alternatives. The feedback during this outreach period informed Stakeholder Group feedback and Elected Leadership Group recommendations for routes and alternatives to be studied in environmental review.

Outreach activities:

- Open House – Federal Way  
Tuesday, September 11, 2018, 6 p.m. – 8 p.m.  
Federal Way Performing Arts Center, 31510 Pete von Reichbauer Way S
- Open House – Fife  
Wednesday, September 12, 2018, 6 p.m. – 8 p.m.  
Fife High School, 5616 20th Street E
- Open House – Tacoma  
Wednesday, September 19, 2018, 6 p.m. – 8 p.m.  
Best Western Plus Tacoma Dome Hotel, 2611 East E Street

Between September 1–21, 2018, an online open house was available for members of the public who were unable to attend the in-person open houses. The online open house provided a brief overview of the project and instructions on how to navigate the site, followed by a demographics survey. For each project segment, the station and route alternatives were presented with explanations for their respective potential and challenges. Each station area page featured a question with criteria to evaluate each option to give users the opportunity to provide route and station-specific feedback.



These activities were advertised with:

- Postcard notifications distributed to over 67,000 homes, apartments, and businesses in the project area.
- Three project email updates sent to more than 6,200 recipients on the project listserv.
- Posters distributed to over 150 locations throughout Federal Way, Fife, Milton, Tacoma, and Puyallup Tribal areas.
- Print and online display advertisements in 11 local publications.
- Facebook posts on the Sound Transit page, reaching over 13,000 users and engaging over 600 people.
- Sound Transit “X” posts, reaching over 18,000 “X” users and engaging 271 users with 16 reposts and 17 likes.
- One new release on August 30, 2018.
- Notification toolkits distributed to 10 local community organizations.

Throughout the outreach period, Sound Transit continued to conduct interviews with community leaders, jurisdictions, and social service providers to identify additional ways to reach underrepresented populations.

### **4.3 NEPA/SEPA Scoping Outreach**

NEPA/SEPA scoping provided an opportunity for the public to learn about and provide comments on the project as it began formal environmental review under NEPA, including the refined Purpose and Need statement, potential alternatives, and environmental resources to evaluate in the EIS. Scoping supports the project’s overall planning, public involvement, and state and federal environmental approach.

The comment period for scoping was from April 1 through May 1, 2019. During this time, several meetings helped to inform and obtain input from Tribes, agencies, and the public. The scoping period included an agency meeting, three open houses, and a listening session. During the scoping process, people were able to provide comments through an online forum, email, mail, and phone. People were also able to provide comments at the open houses and listening session.

In addition to the public meetings, a scoping meeting was held for Tribes, agencies, and jurisdictions on the afternoon of April 16, 2019, in Fife. Agency participants were able to learn about the project, ask questions, and provide informal comments in advance of providing their formal scoping comment letters.

As part of the broader community engagement efforts, Sound Transit has also conducted briefings for city councils and organizations and conducted regular meetings with the Stakeholder Group, Elected Leadership Group, and Interagency Group.

Sound Transit hosted three community open houses (public meetings) and one targeted listening session to inform and obtain input from the public. Open houses were held at the following locations:

- Open house at Fife Community Center  
April 16, 2019, 6 to 8 p.m. 2111 54th Avenue E, Fife, WA 98424
- Open house at Greater Tacoma Convention Center  
April 17, 2019, 6 to 8 p.m. 1500 Commerce Street, Tacoma, WA 98402
- Open house at Federal Way Performing Arts and Event Center  
April 23, 2019, 6 to 8 p.m. 31510 Pete von Reichbauer Way S, Federal Way, WA 98003
- Listening session at Eastside Community Center  
May 2, 2019, 6:30 to 8:30 p.m. 1721 E 56th Street, Tacoma, WA 98404

The listening session was an additional event added to the scoping and outreach program to provide further opportunities for members of the East Tacoma community. The event, which had translators available, allowed community members to discuss their views on the neighborhood that would be served by a proposed Portland Avenue Station (identified as the East Tacoma station area during 2019 scoping) and to provide comments on the alternatives.

All public meetings were held at locations accessible to persons with disabilities. Sound Transit advertised the community open houses through a variety of methods, including:

- Mailer notifications sent to over 67,000 households and businesses, providing overview of the entire project and feedback received to date.
- Posters distributed to 151 locations throughout Federal Way, Fife, Milton, Tacoma, and reservation lands of the Puyallup Tribe of Indians (including translated versions in Korean, Spanish and Vietnamese).
- Project email updates to more than 6,200 recipients on the South Sound email list.
- Print and online display advertisements in 13 local publications.
- Notification toolkits to 29 local organizations and properties to share with their respective networks.
- Briefings to organizations and cities in the project corridor.
- In-person field visits to major properties where sites were being considered.
- Social media posts, which reached over 34,500 Facebook users and engaged over 140 “X” users.

Table C4-1 summarizes open house advertisements, organized by publication date.

To reach minority populations, advertisements were published in *El Siete Dias*, *Korea Daily*, *Korean Times Seattle*, *Northwest Vietnamese News*, and *Tu Decides*.

An online open house was available from April 1, 2019, to May 1, 2019, and gave the public an opportunity to review and provide feedback on station and route alternatives. In-person open houses provided laptops for attendees to directly input their feedback around each alternative. The website featured the TDLE Project purpose and need, information about the scoping period and what an EIS entails, as well as a description of the advantages and disadvantages of each route and station alternative. Users were encouraged to comment on each station and route alternative after reviewing interactive maps, station plan layouts, and visualizations.

**Table C4-1 Online and Print Display Advertisements**

<b>Publication</b>	<b>Format and Run Dates (2019)</b>
El Siete Dias (translated)	Print: April 1 through 30 Online: April 1 through 30
Federal Way Mirror	Print: April 12 and 19 Online: April 1 through May1
International Examiner	Print: April 10 through 23 Online: April 5 through 26
Korea Daily (translated)	Print: April 16 and 20
Korean Times Seattle (translated)	Print: April 12 and 19
Northwest Military	Online: April 1 through 30
Northwest Vietnamese News (translated)	Print: April 5, 12, 19 Online: April 5 through 26
The Seattle Times	Print: April 14 and 21 Online: April 3 through 24
South Sound Biz	Online: April 1, 3, 4, 8, 10, 11, 15, 17, 18, 19, 22, 23
Tacoma News Tribune	Print: April 15 and 22 Online: April 5 through 26
Tacoma Weekly	Print: April 14 and 21 Online: April 12 through 26
Tu Decides (translated)	Online: April 12 and 19
Weekly Volcano	Print: April 4 through 17

## 4.4 Targeted Outreach Efforts

Sound Transit is committed to equitable engagement and inclusive outreach with community groups, organizations, residents, businesses, and underrepresented populations who do not typically participate in traditional in-person and online open houses or engagement opportunities. The project team has conducted targeted outreach to populations with limited English proficiency, low incomes, and historically underrepresented groups to build long-term relationships and provide meaningful opportunities to engage in the project planning, design, and environmental review processes. The project team reached out to community organizations and social service providers, when possible, to learn more about individual community needs and to identify events to attend.

### November 2019 Outreach Activities (November 13, 2019 – December 6, 2019)

Sound Transit focused outreach efforts during Draft EIS development on providing updates on the process to date and the preferred alternatives and other alternatives for study identified by the Sound Transit Board of Directors. This outreach period was intended to provide a project update around alternatives design. This was achieved through a series of informal drop-in sessions, an online open house, and additional community events.

The project team chose a variety of drop-in locations and times to ensure interested members of the public could attend. Many drop-in sessions were in areas accessible by transit or at common community spaces. Visitors were encouraged to stay up to date on project information and stay

tuned for their future opportunity to provide input during the Draft EIS comment period. In-language materials were available at all drop-in sessions.

- Federal Way Link Extension Open House  
Wednesday, November 13, 2019, 6 p.m. – 8 p.m.  
Highline College, 2400 S 240th Street, Des Moines
- Drop-in session – East Tacoma  
Saturday, November 16, 2019, 10 a.m. – 12 p.m.  
Eastside Community Center, 1721 E 56th Street, Tacoma
- Drop-in session – Federal Way  
Saturday, November 16, 2019, 10 a.m. – 12 p.m.  
Federal Way Library, 34200 1st Way S, Federal Way
- Drop-in session – Milton  
Wednesday, November 20, 2019, 8 a.m. – 10 a.m.  
Starbucks, 623 Meridian Ave NE, Edgewood
- Drop-in session – Tacoma  
Wednesday, November 20, 2019, 5 p.m. – 7 p.m.  
Evergreen State College Tacoma Campus, 1210 6th Avenue E, Tacoma
- Federal Way Link Extension Open House  
Wednesday, November 20, 2019, 6 p.m. – 8 p.m.  
Federal Way Performing Arts Center, 31510 Pete von Reichbauer Way S, Federal Way
- Drop-in session – Fife  
Thursday, November 21, 2019, 10 a.m. – 12 p.m.  
Poodle Dog, 522 54th Avenue E, Fife
- Drop-in session – Tacoma  
Tuesday, December 3, 2019, 10 a.m. – 12 p.m.  
UW Tacoma, 1900 Commerce Street, Tacoma
- Drop-in session – Tacoma  
Wednesday, December 4, 2019, 6 a.m. – 8 a.m.  
Tacoma Sounder Station, 610 Puyallup Avenue, Tacoma
- Drop-in session – Federal Way  
Wednesday, December 4, 2019, 5 p.m. – 7 p.m.  
Federal Way Community Center, 876 S 333rd Street, Federal Way
- Drop-in session – Tacoma  
Friday, December 6, 2019, 6 p.m. – 8 p.m.  
Salishan Family Investment Center, 1724 E 44th Street, Tacoma

More than 350 people attended drop-in sessions in Federal Way, Fife, Milton, and Tacoma. All materials from the drop-in sessions were available on the site. The site had a landing page translated into Khmer, Korean, Russian, Spanish, and Vietnamese with instructions on using Google Translate to navigate the site.

An online open house was available from November 13, 2019, to December 9, 2019. It provided a project update on work that occurred after scoping in spring 2019 and gave the public an opportunity to review and comment on station and route alternatives. The site featured preliminary station layouts and visualizations, and it outlined the next steps for the project and the next opportunity to provide project comments and feedback.

These activities were advertised with:

- Facebook posts reaching over 16,400 users.
- Mailers to over 59,000 homes, apartments, and businesses along the project corridor.
- A second round of mailers — an invitation to get engaged, with a “we’re in the neighborhood” message — to over 2,500 properties within 500 feet of any alternative.
- Posters distributed to 107 different locations in Federal Way, Fife, Milton, Tacoma, and reservation lands of the Puyallup Tribe of Indians.
- Three project email updates sent to more than 6,200 recipients on South Sound email lists.
- Notification toolkits sent to 12 local organizations and properties to share with their respective networks.
- “X” notifications.

#### **Fall 2020 Outreach Activities (September 22, 2020 – November 2, 2020)**

Sound Transit conducted COVID-sensitive engagement to provide updates on the latest project refinements being studied in the Draft EIS. In addition to learning more about the status of the project, members of the public were invited to review and comment on preliminary station design concepts, as well as offer feedback on potential projects to improve access to the stations for those walking, rolling (e.g., using a wheelchair or riding a bicycle), and taking transit. This outreach period was intended to expand the project audience – particularly to historically underrepresented communities – in advance of the Draft EIS publication. Virtual briefings and an online open house were used to engage the public during the outreach period.

Sound Transit participated in 11 virtual conversations with 10 community-based organizations to better support engagement with the online open house content. The format of these conversations was tailored to support the requested needs of each organization (see Table C4-2). Visitors were encouraged to stay up to date on project information and stay tuned for their future opportunity to provide input during the Draft EIS comment period.

**Table C4-2 Online Meetings with Community-Based Organizations, Fall 2020**

Organization	Briefing Audience	Date (2020)	Format
Asia Pacific Cultural Center	Staff and member community leaders	Oct. 1 and 29	Two virtual listening sessions: the first to support community leaders in understanding engagement and feedback goals so they could disseminate information in their respective communities and encourage participation; the second to listen to feedback collected
Federal Way Black Collective	Members	Oct. 1	Virtual Facebook Live facilitated discussion with representatives from TDLE, Federal Way Link Extension, and Operations and Maintenance Facility South projects
Active Transportation Community of Interest Puyallup Watershed Initiative	Members	Oct. 8	Virtual regular monthly meeting
Tacoma Area Commission on Disabilities	Members	Oct. 9	Virtual regular monthly meeting
Multi-Service Center	Staff	Oct. 15	Virtual presentation to staff members

**Table C4-2 Online Meetings with Community-Based Organizations, Fall 2020  
(continued)**

Organization	Briefing Audience	Date (2020)	Format
Tacoma Transit-Oriented Development Advisory Group	Members	Oct. 19	Virtual regular monthly meeting
Tacoma Transportation Commission	Members	Oct. 21	Virtual regular monthly meeting
Fife Library	Parents and young children	Oct. 23	Train-themed, virtual story time event with train safety discussion for young children and their parents
Tacoma Bicycle Pedestrian Technical Advisory Group	Members	Oct. 26	Virtual regular monthly meeting
Salishan Association	Staff	Oct. 29	Virtual presentation to organization staff

The project team was also invited to provide shorter updates to promote the engagement period during regularly scheduled meetings or by email with the following project partners:

- Eastside Collaborative.
- Eastside Neighborhood Advisory Council of Tacoma.
- Fife Chamber of Commerce.
- Hopelink.
- New Tacoma Neighborhood Council.

More than 1,300+ people attended the 16 virtual briefings.

An online open house was available from September 29, 2020, to November 2, 2020. It provided a project update on work that occurred after the fall 2019 outreach and gave the public an opportunity to view station concept graphics for each station alternative and answer survey questions related to these concepts. Additionally, the site used maps and text to describe potential projects to improve nonmotorized access to the station and visitors were asked to provide comments on the projects. Visitors could also suggest new projects for Sound Transit to include in their evaluation.

Outreach efforts sought equitable engagement as described in Section B.6.10. All materials from the virtual briefings were available on the online open house. The site content was fully available in English, Korean, Spanish, and Vietnamese, with instructions on using Google Translate to navigate the site.

Between September 29, 2020, and November 2, 2020, the online open house had:

- Over 3,300 unique visitors to the English site.
- 230 visitors to the Spanish site.
- 40 visitors to the Vietnamese site.
- 40 visitors to the Korean site.

These activities were advertised with:

- Facebook posts.
- Three project email updates sent to more than 5,200 listserv subscribers.
- Print and online display advertisements in 11 local publications.
- Notification toolkits sent to 50 local organizations and properties to share with their respective networks.
- “X” notifications.

Between September 29, 2020, and November 2, 2020, Sound Transit received over 210+ responses to the station design concept surveys and 200+ reactions to the nonmotorized projects. This comment period was intended for the public to share thoughts or ask questions they had about station access planning.

### **Spring 2023 Outreach Activities (February 27, 2023 – March 17, 2023)**

As the analysis of the alternatives was being developed, Sound Transit identified the need to consider additional route and station options through advancement of the environmental review conversations with the Puyallup Tribe of Indians and the City of Fife. Outreach efforts in spring 2023 focused on providing updates on the process to date and the new route and station options that were being considered for study in the environmental review process. This was achieved through a series of informal drop-in sessions and an online open house.

The project team chose a variety of drop-in locations and times to ensure interested members of the public could attend. Many drop-in sessions were in areas accessible by transit or at common community spaces. Visitors were encouraged to stay up to date on project information and stay tuned for their future opportunity to provide input during the Draft EIS comment period.

- Drop-in session – Milton  
Wednesday, March 8, 2023, 5 p.m. – 7 p.m.  
Milton/Edgewood Library, 900 Meridian Avenue E, Milton, WA 98354
- Drop-in session – South Federal Way  
Tuesday, March 14, 2023, 8 a.m. – 10 a.m.  
Federal Way Community Center, 876 S 333rd Street, Federal Way, WA 98003
- Drop-in session – Fife  
Wednesday, March 15, 2023, 11 a.m. – 1 p.m.  
Poodle Dog Restaurant, 1522 54th Avenue E, Fife, WA 98424

More than 110 people attended drop-in sessions in Federal Way, Fife, and Milton.

An online open house was available from February 17, 2023, to March 17, 2023. It provided a project update on design progress since fall 2020 and gave the public an opportunity to learn about the new route and station options in South Federal Way and Fife being considered for study in the environmental review process. The site featured preliminary station layouts and visualizations, outlined the next steps for the project and the next opportunity to provide project comments and feedback.

Outreach efforts sought equitable engagement, as described in Section B.6.10. All materials from the drop-in sessions were available on the site. The online open house was translated into English, Khmer, Korean, Russian, Spanish, and Vietnamese, with instructions on using Google Translate to navigate the site.



Between February 27, 2023, and March 17, 2023, the online open house:

- Had 2,150 unique visitors, including over 50 visitors to in-language sites.

These activities were advertised with:

- Facebook posts.
- Mailers to over 12,900 homes, apartments, and businesses near the proposed route and station options in Fife, Milton, and South Federal Way.
- Three project email updates sent to more than 5,200 listserv subscribers.
- More than 60 phone calls to properties potentially affected by the potential route and station options in Fife, Milton, and South Federal Way.
- Notification toolkits sent to 5 local organizations and properties to share with their respective networks.
- “X” notifications.

Between February 27, 2023, and March 17, 2023, Sound Transit received 30 responses from the Fife survey and 45 responses from the South Federal Way survey. This comment period was intended for the public to share thoughts or ask questions they had as the project moved forward.

In addition, tables C4-3 and C4-4 list the briefings, interview, events, and community events undertaken to engage with communities in the study area during outreach efforts.

**Table C4-3 List of Briefings and Interviews**

Organization	Date
<b>Briefings</b>	
301 E 26th Street Developers	10/14/2021
59th Ave Partners LLC	6/3/2021
Active Transportation Community of Interest Puyallup Watershed Initiative	10/8/2020
Affordable Housing Consortium	9/13/2018
Asia Pacific Cultural Center	4/29/2024
Associated Catholic Cemeteries	5/15/2023
Bates Technical College	3/7/2019
Belmor Park Golf and Country Club	8/20/2019
Bicycle Pedestrian Transportation Advisory Group	10/26/2020
Building Owners and Managers Association	4/28/2021
Camping World	9/28/2020
Community Oversight Panel	3/8/2023
Creating Our King County	5/5/2018
DBM Contractors	4/6/2023
Dome District	<b>2018:</b> 7/12/2018, 8/9/2018, 11/8/2018 <b>2019:</b> 2/14/2019, 3/14/2019, 4/15/2019, 7/11/2019, 11/14/2019, 12/13/2019
Dome District Businesses	5/13/2024, 6/10/2024, 7/8/2024
Dome District Social	10/10/2019

**Table C4-3 List of Briefings and Interviews (continued)**

<b>Organization</b>	<b>Date</b>
Dome District, 4 agencies meeting (WSDOT, City of Tacoma, Pierce Transit, and Sound Transit)	9/5/2018
Dometop Neighbors	6/12/2024
Downtown on the Go Board of Directors	<b>2018:</b> 4/12/2018 <b>2019:</b> 4/11/2019
Downtown on the Go	<b>2019:</b> 11/8/2019, 11/15/2019
Downtown Tacoma BIA	9/6/2018
East Tacoma Collaborative	<b>2019:</b> 11/15/2019 <b>2020:</b> 9/9/2020, 12/9/2020
Eastside Collaborative	<b>2018:</b> 6/29/2018, 7/9/2018, 9/27/2018, 12/21/2018 <b>2020:</b> 8/26/2020
Eastside Neighborhoods Advisory Council of Tacoma (ENACT)	<b>2018:</b> 10/15/2018 <b>2019:</b> 11/18/2019 <b>2024:</b> 6/17/2024
Edgewood Fife Milton Kiwanis Club	<b>2018:</b> 5/31/2018, 9/27/2018
Esplanade (Tacoma) Speaker Series	9/23/2018
Federal Way Chamber of Commerce	<b>2018:</b> 8/21/2018, 9/11/2018 <b>2019:</b> 3/21/2019, 3/6/2019 <b>2020:</b> 8/5/2020 <b>2021:</b> 10/14/2021 <b>2022:</b> 5/4/2022 <b>2023:</b> 7/5/2023
Federal Way City Council	<b>2018:</b> 5/15/2018 <b>2019:</b> 10/1/2019 <b>2020:</b> 11/17/2020 <b>2023:</b> 3/7/2023
Federal Way Community Connections	9/4/2018
Federal Way Diversity Commission	1/9/2019
Fife City Council	<b>2018:</b> 2/27/2018 <b>2020:</b> 8/18/2020 <b>2023:</b> 4/18/2023
Fife Business Park	1/6/2021
Fife businesses	12/23/2019
Fife Milton Edgewood Chamber Membership	4/18/2018
Fife Pacific Plaza	6/26/2019
Freighthouse Square Owners	<b>2019:</b> 11/6/2019, 11/8/2019, 11/26/2019, 11/22/2019, 12/23/2019
Graham Real Ventures	9/6/2022
Harsch Investment Properties	<b>2019:</b> 10/3/2019, 12/3/2019, 12/4/2019 <b>2020:</b> 1/13/2020
HealthPoint Federal Way/King County Public Health	1/9/2019
Infiniti Dealership	8/26/2020
JetroRD	12/16/2020
John L Scott/Windermere	11/20/2020
Joe Hall Construction	12/2/2020

**Table C4-3 List of Briefings and Interviews (continued)**

<b>Organization</b>	<b>Date</b>
Kings Motor Inn	<b>2020:</b> 8/4/2020 <b>2022:</b> 11/15/2022
Kitsap Bank	4/28/2021
Korean Community Quarterly Meeting	<b>2018:</b> 9/20/2018 <b>2019:</b> 3/21/2019
Korean Women's Association	1/16/2020
Lynden Transport	11/27/2023
McDonalds (Fife)	9/4/2019
City of Fife and Pick-Quick, Bucky's Auto	6/5/2019
Mark Coleman and the City of Fife	7/16/2019
VT Radio and East Tacoma Collaborative	6/12/2019
Milton City Council	<b>2018:</b> 3/5/2018 <b>2019:</b> 4/8/2019 <b>2020:</b> 9/14/2020 <b>2023:</b> 5/8/2023
Milton Storage	11/15/2023
Merlone Geier Partners	2/23/2022
Multi Service Center	<b>2019:</b> 1/15/2019 <b>2020:</b> 10/15/2020 <b>2024:</b> 6/25/2024
NE Tacoma Neighborhood Council	4/20/2023
New Tacoma Neighborhood Council	<b>2018:</b> 4/11/2018, 12/12/2018 <b>2019:</b> 1/9/2019, 2/13/2019, 5/8/2019, 6/12/2019, 9/11/2019, 11/13/2019 <b>2020:</b> 9/9/2020, 10/14/20 <b>2021:</b> 6/6/2021, 7/5/2021, 9/8/2021, 10/13/2021 <b>2022:</b> 4/13/2022, 5/11/2022, 9/14/2022
North Lake Improvement Club of Federal Way	3/4/2019
O'Brien Auto Group/Tacoma RV Briefing	1/23/2019
PNW Dealers	11/4/2020
Pacific Lutheran University Writing 101 Class on Public Transportation	10/23/2018
Pierce County Chief Appointed Officials	11/21/2018
Pierce County Coordinated Transportation Coalition	5/17/2019
Pierce County Council	4/25/2023
Port of Tacoma Commission	<b>2018:</b> 4/19/2018 <b>2019:</b> 3/21/2019 <b>2020:</b> 8/20/2020
Poulsbo RV	1/13/2020
Presentation to Pierce DSHS WorkFirst network	7/23/2019
Raceways Technology	<b>2019:</b> 10/23/2019 <b>2021:</b> 1/15/2021
Rainbow Center	7/17/2018
Rainier View Senior Apartments	12/19/2018

**Table C4-3 List of Briefings and Interviews (continued)**

<b>Organization</b>	<b>Date</b>
Salishan Association Virtual Coffee Connections Cafe	6/30/2020, 7/21/2020, 8/18/2020, 9/1/2020
SeaMar Fife	3/8/2019
Smith Brothers Farms	2/2/2021
Sound Ford	8/26/2020
South End Neighborhood Council	1/4/2021
South King County Mobility Coalition	<b>2018:</b> 11/8/2018 <b>2019:</b> 7/11/2019 <b>2020:</b> 9/10/2020
South King Fire	10/18/2023
Spring Valley Mobile Home Park	6/8/2023
St. Paul Chong Hasang Church	<b>2018:</b> 10/24/2018 <b>2023:</b> 4/12/2023, 10/11/2023
Tacoma Area Commission on People with Disabilities	<b>2019:</b> 4/12/2019 <b>2020:</b> 10/9/2020
Tacoma City Council	<b>2018:</b> 9/11/2018 <b>2019:</b> 3/19/2019, 6/11/2019, 11/12/2019 <b>2020:</b> 8/4/2020 <b>2021:</b> 3/30/2021 <b>2023:</b> 3/21/2023 <b>2024:</b> 5/21/2024
Tacoma Councilmembers	<b>2018:</b> 1/28/2018 <b>2019:</b> 9/17/2019, 9/20/2019, 9/30/2019, 10/1/2019, 11/4/2019, 11/5/2019
Tacoma Green Drinks	8/2/2018
Tacoma Kiwanis Club	<b>2019:</b> 6/19/2019 <b>2022:</b> 4/19/2022
Tacoma IPS Committee	2/28/2018
Tacoma JMAC	1/11/2019
Tacoma Public Utilities	1/7/2019
Tacoma Planning Commission	<b>2019:</b> 3/20/2019, 11/18/2019
Tacoma Soccer Center	1/29/2021
Tacoma TOD Advisory Group	<b>2019:</b> 10/21/2019, 11/18/2019, 12/16/2019 <b>2020:</b> 10/19/2020
Tacoma Transportation Commission	<b>2018:</b> 12/19/2018 <b>2019:</b> 3/20/2019, 11/18/2019 12/19/2019 <b>2020:</b> 10/21/2020
Tacoma Urban League	5/11/2022
Telecare Corp	12/18/2020
Transit Access Stakeholders	1/10/2019
Union Marine	<b>2020:</b> 9/23/2020 <b>2021:</b> 6/23/2021
Walmart	5/14/2024

**Table C4-3 List of Briefings and Interviews (continued)**

Organization	Date
<b>Stakeholder Interviews</b>	
Asia Pacific Cultural Center	10/18/2019
City of Fife	10/17/2019
Consejo Counselling	8/8/2018
East Tacoma Collaborative	10/18/2019
Eastside Community Center	10/24/2019
Fife Public Schools	11/20/2019
Habitat for Humanity	7/18/2018
Hopelink	11/25/2019
Korean Women's Association	10/31/2019
L'Arche Tahoma Hope	7/11/2018
Pierce County Aging and Disability Resource Center and Pierce County Coordinated Transportation Coalition	7/11/2018
Salishan Association	<b>2018:</b> 7/18/2018 <b>2019:</b> 11/4/2019
St. Paul Chong Hasang Church	11/8/2019
Summit Olympus School	6/27/2018
Tacoma Area Coalition for Individuals with Disabilities	<b>2018:</b> 7/18/2018 <b>2019:</b> 10/17/2019
Tacoma Community House	6/26/2018
Tacoma Public Schools	6/28/2018
Tacoma Urban League	10/17/2019

**Table C4-4 Community Events**

Organization	Date
<b>Fairs, Festivals and Tabling Events</b>	
Adventist Community Services Food Bank	8/15/2018
Broadway Farmers Market	9/27/2018
Downtown on the Go Block Party	9/7/2019
Downtown Tacoma Block Party	8/4/2024
Downtown to Defiance	9/9/2018
East Tacoma Community Office Hours	2/23/2019
Eastside Family Support Center Block Party	8/12/2018
EL1 Vision Night	4/28/2019
Federal Way Community Festival (previously the Flavor of Federal Way)	<b>2018:</b> 8/18/2018 <b>2019:</b> 8/10/2019, 8/17/2019 <b>2024:</b> 8/10/2024
Federal Way Farmers Market	<b>2018:</b> 6/22/2018 <b>2019:</b> 7/27/2019, 7/29/2019 <b>2021:</b> 6/19/21, 7/24/21 <b>2022:</b> 9/5/2022

**Table C4-4 Community Events (continued)**

Organization	Date
Federal Way Library	1/20/2019, 1/23/2019, 1/30/2019, 11/16/2019
Federal Way Community Center Touch-a-truck	5/20/2023
Federal Way State of the City	<b>2019:</b> 2/28/2019 <b>2020:</b> 2/27/2020
Federal Way Transit Center Outreach	8/31/2018
Fife Harvest Festival	<b>2018:</b> 10/5/2018 <b>2019:</b> 10/6/2019 <b>2022:</b> 10/1/2022 <b>2023:</b> 10/7/2023 <b>2024:</b> 10/5/2024
Fife Library	<b>2019:</b> 1/7/2019, 1/15/2019 <b>2020:</b> 8/12/2020, 10/23/2020
Fife Music in the Park	6/29/2018
Fife Pride Bingo Night	<b>2022:</b> 6/11/2022 <b>2023:</b> 6/3/2023
Fix-It Fair	2/23/2019
Foss Water Summer Concert Series	6/15/2019
Greentrike Back to School Event	8/31/2022
Korean Chuseok Festival (Asia Pacific Cultural Center)	<b>2023:</b> 9/23/2023 <b>2024:</b> 9/14/2024
Lincoln High School Back to School Fair	10/9/2018
Lunar New Year (Asia Pacific Cultural Center)	<b>2022:</b> 2/19/2022 <b>2024:</b> 2/24/2024
Milton Community Office Hours	2/21/2019
Milton Days	<b>2018:</b> 8/19/2018 <b>2019:</b> 8/15/2019 <b>2024:</b> 8/17/2024
MOSAIC Festival (formerly Ethnic Festival)	<b>2018:</b> 7/28/2018, 7/29/2018 <b>2019:</b> 7/28/2019 <b>2022:</b> 7/23/2022, 7/24/2022 <b>2023:</b> 7/29/23, 7/30/23
Park(ing) Day	9/16/2022
Pasifika Food Fest (Asia Pacific Cultural Center)	<b>2021:</b> 7/31/2021 <b>2022:</b> 7/30/2022
Pierce Transit BRT Open House	<b>2019:</b> 1/24/2019, 1/29/2019
Puyallup Avenue Corridor Improvements Open House	5/29/2024
Puyallup Tribe Pride	<b>2023:</b> 7/22/2023 <b>2024:</b> 7/20/2024
Puyallup Tribe Youth Canoe Journey	7/31/2024
Red, White, and Blue Festival	7/4/2018
Roosevelt Elementary Back to School Fair	10/3/2018
Salishan Association Holiday Bazaar	12/6/2019



**Table C4-4 Community Events (continued)**

Organization	Date
Salishan Association's Night Out Festival	<b>2019:</b> 8/7/2019, 8/8/2019 <b>2021:</b> 8/3/2021 <b>2022:</b> 8/2/2022 <b>2023:</b> 8/1/2023 <b>2024:</b> 8/6/2024
Sound to Narrows	6/26/2018
Sounders FC2 Game	8/29/2018
Tacoma Juneteenth	<b>2023:</b> 6/21/2023 <b>2024:</b> 6/19/2024
Tacoma Pride	<b>2018:</b> 7/13/2018, 7/14/2018 <b>2022:</b> 7/9/2022 <b>2023:</b> 7/25/2023 <b>2024:</b> 7/13/2024
Tacoma Rainiers Game	8/16/2018
Tacoma Sounder Station tabling	9/17/2018

## 4.5 Tribal Coordination

As the lead agency under NEPA, FTA is consulting with four federally recognized Tribes for the TDLE project:

- Puyallup Tribe of the Puyallup Reservation (Puyallup Tribe of Indians).
- Confederated Tribes and Bands of the Yakama Nation (Yakama Nation).
- Muckleshoot Indian Tribe.
- Nisqually Indian Tribe.

Government-to-government consultation with these Tribes was initiated through consultation letters sent by FTA in February 2018, followed by a formal invitation to participate in scoping and the initiation of Section 106 consultation in April 2019. Through the consultation process, the Tribes have the opportunity to contribute to the development of information and the preparation of environmental analyses and to review and provide comments on Section 106 documentation and the administrative draft of the EIS.

In February 2023, the Puyallup Tribe of Indians sent a letter to Sound Transit expressing concerns about the potential impacts of the SF Enchanted Parkway and SF I-5 alternatives to cultural resources, particularly around the historical St. George's Indian Boarding School property and associated cemetery. As a result, Sound Transit reconsidered the alternatives being evaluated in this Draft EIS and included new alternatives on SR 99 through the South Federal Way Segment.

In addition, the Puyallup Tribe of Indians participates in the Elected Leadership Group and is an invited participant to the Interagency Group. The Elected Leadership Group is a comprehensive group of elected officials and Tribal representatives that represent the project corridor and the Sound Transit Board. The Interagency Group is composed of senior staff from the Tribes, agencies, and jurisdictions with permitting authority who can provide insight on technical decisions.

## 5 RACIAL EQUITY TOOL PROCESS

As part of Sound Transit's commitment to diversity, equity, and inclusion, TDLE is implementing a Racial Equity Tool (RET) that addresses potential negative impacts to communities of color and the historically marginalized, by understanding the importance of historic past harms and current demographic data. Past harms to local communities, including neighborhoods affected by TDLE, are from large infrastructure projects such as the terminus of the transcontinental railroad in Tacoma and the construction of the I-5, which severely impacted native populations and communities of color. The TDLE RET is an effort to:

- Understand past harms and current demographic make-up of areas that are potentially impacted by the project. Demographics include both residential uses and businesses representing communities of color and historically marginalized persons.
- Avoid replicating the mistakes of the past in the planning and construction of TDLE.
- Reduce racial disparities.
- Identify new opportunities to advance equity for those who have historically been marginalized.
- Acknowledge that station access provides benefits to the surrounding communities, including persons of color and those who have been historically marginalized.

The TDLE RET integrates the explicit consideration of equity in processes and decision-making pertaining to TDLE. It includes an overview of the historical and demographic context of the TDLE corridor and the station locations. This context has provided the basis to analyze current demographics around the station areas and determine how Sound Transit can best serve the communities who will use them.

TDLE RET goals and actions consist of two general areas of focus:

- **Demographics Context.** The first goal considers the implications of the project alignment and station location and design within the community. Both potential impacts and benefits of the project by the surrounding communities would be described. The timeline for this goal is ongoing and iterative, with a near-term goal to use demographic analysis in aligning equity goals with jurisdictions, the community, and other partners. The TDLE team will present equity findings and strategies to the Sound Transit Board when project decisions, such as identifying the Preferred Alternative, are made.
- **Meaningful Public Engagement.** The second goal is equitable outreach, targeting priority populations for engagement and so Sound Transit can integrate their comments and voices in decisions and station design. Equitable engagement strategies have been developed for each station area. These strategies were created based on the identification of priority populations, including the Puyallup Tribe of Indians, the St. Paul Chong Hasang Korean church community, the Salishan neighborhood in Tacoma, organizations for people with disabilities, and others who are impacted by, and can benefit from, the project. The actions associated with equitable outreach are on-going throughout the various phases of TDLE and will evolve as Sound Transit receives comments from priority communities and organizations. While not an exhaustive list, priority populations may include Tribes, people of color, people with disabilities, youth, the elderly, low-income populations, and women.

## 6 POTENTIAL PROJECT IMPACTS AND MITIGATION

### 6.1 Potential Project Impacts and Mitigation Strategies

The following section summarizes analysis of the potential for disproportionate and adverse effects on minority and/or low-income populations for both the No-Build Alternative and the build alternatives.

Table C6-1 provides a high-level summary of project benefits, impacts and potential mitigation identified for environmental resource areas analyzed as part of the Draft EIS. Table C6-1 also provides information for those elements of the environment where the project impacts and benefits would accrue to a different degree for minority and low-income populations. Many elements of the environment would not have adverse impacts; where adverse impacts occur, they would be mitigated.

If TDLE is constructed in phases, the minimum operable segment (M.O.S.) to the station in South Federal Way and, to a lesser degree, the M.O.S. to the station in Fife would have the same type of impacts as described in Table C6-1, just in a smaller geographic area until the remaining phases were completed.

Under the No-Build Alternative, no long-term impacts to environmental justice populations are expected. Communities in the study area would continue to develop according to local and regional plans, with the exception of plans that assume future investments in light rail transit and their associated transportation, social, and economic benefits. No displacements or relocations would occur, and environmental justice communities within the study area would not be negatively impacted by property acquisitions or construction factors such as noise and vibration. Although no adverse impacts are anticipated, under the No-Build Alternative, environmental justice populations living in the study area would not receive benefits resulting from the construction of TDLE, including increased transit coverage, local and regional connectivity, service frequency, access to transit, improvements to air quality, and access to employment opportunities facilitated by the improved transit service.

Table C6-1 Summary of Potential Project Impacts and Mitigation

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
Transportation	<p><b>Common to All</b></p> <ul style="list-style-type: none"> <li>For all build alternatives, changes to traffic circulation, property access, and traffic control would be minor and would primarily occur near stations.</li> <li>With all build alternatives and station options, there would be an increase in vehicle and nonmotorized activity around the station areas, which would increase the potential for conflicts among different travel modes.</li> <li>In areas where parking demand may exceed available supply at the stations, there could be the potential for spillover to nearby on-street or private parking that surrounds the station areas.</li> <li>All build alternatives would have short-term construction impacts from reduced roadway capacity, truck traffic, loss of parking, road and lane closures, changes in bus routes and stop locations, sidewalk and/or bicycle lane closures or width reductions, and changes to property access.</li> </ul> <p><b>Federal Way Segment</b></p> <ul style="list-style-type: none"> <li>All Federal Way Segment study intersections would operate within agency standards.</li> <li>The build alternatives in the Federal Way Segment would permanently remove up to 79 public parking spaces and between 301 and 327 private parking spaces.</li> </ul> <p><b>South Federal Way Segment</b></p> <ul style="list-style-type: none"> <li>All South Federal Way Segment study intersections would operate within agency standards.</li> <li>The build alternatives in the South Federal Way Segment would not permanently remove any public parking spaces but permanently remove between 3 and 96 private parking spaces.</li> </ul> <p><b>Fife Segment</b></p> <ul style="list-style-type: none"> <li>Fife Median Alternative: Pacific Highway E would be reconfigured in some locations to provide space for a median. This would have impacts to traffic circulation, property access, and traffic control.</li> <li>Six intersections in the Fife Segment would not meet agency standards or would worsen delay where standards are not met under the No-Build condition.</li> <li>The build alternatives in the Fife Segment would not permanently remove any public parking spaces but would permanently remove between 183 and 254 private parking spaces.</li> </ul> <p><b>Tacoma Segment</b></p> <ul style="list-style-type: none"> <li>Short term construction impacts over the Puyallup River would temporarily impact navigation and fishing activities, including those protected rights of the Puyallup Tribe of Indians.</li> <li>Nine intersections in the Tacoma Segment would not meet agency standards or would worsen delay where standards are not met under the No-Build condition.</li> <li>The build alternatives in the Tacoma Segment would permanently remove between 40 and 187 public parking spaces and between 0 and 5 private parking spaces.</li> </ul>	<ul style="list-style-type: none"> <li>Mitigation would be required for the intersections that do not meet the agency operational standards.</li> <li>Sound Transit would evaluate impacts from TDLE patrons using available on-street parking at the Tacoma Dome and Portland Avenue stations in coordination with the City of Tacoma.</li> <li>During construction, Sound Transit would minimize impacts from temporary roadway, sidewalk and bicycle facility closures, and transit service changes by providing detours and modified transit service within construction areas.</li> <li>Sound Transit would consult with the Puyallup Tribe of Indians to avoid conflicts and minimize impacts to navigation and fishing activities. During construction of either bridge option, vessels may be directed to avoid navigating directly under active construction. The river would remain navigable at all times.</li> </ul>	<p>Impacts to minority and low-income people in the study area would be similar in kind and magnitude to those that would be experienced by non-minority and non-low-income populations within the study area. However, the study area includes higher percentages of environmental justice populations compared to non-environmental justice populations.</p>	<ul style="list-style-type: none"> <li>TDLE would provide more reliable transit service.</li> <li>TDLE would provide improved connections to regional destinations, especially in areas where transit service is extremely limited or requires multiple bus transfers.</li> <li>The proposed station locations in the study area would accommodate connections with bus, Sounder, T Line, nonmotorized, and automobile access trips.</li> <li>The stations in both Fife and South Federal Way would include construction of 500-stall park-and-ride facilities to accommodate transit users who would drive to/from the stations.</li> </ul>

**Table C6-1 Summary of Potential Project Impacts and Mitigation (continued)**

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
<b>Acquisitions, Displacements, and Relocations</b>	<b>Federal Way (FW) Segment</b> <ul style="list-style-type: none"> <li>Preferred FW Enchanted Parkway: 0 business displacements and 77 residential displacements.</li> <li>Preferred FW Enchanted Parkway with Design Option: 0 business displacements and 102 residential displacements.</li> </ul>	<ul style="list-style-type: none"> <li>Consistent with the Uniform Relocation Act, residents and businesses displaced by the project would receive compensation and relocation assistance in accordance with Sound Transit's adopted real estate property acquisition and relocation policy, procedures, and guidelines (Sound Transit 2017).</li> <li>For residential relocations, Sound Transit relocation specialists would work with affected residents to help them relocate to a comparable dwelling nearby.</li> <li>Sound Transit would ensure that comparable housing is made available, whether the displaced resident owns or rents their home. Aside from the level of advisory services required for each displaced resident case, the mitigation provided to low-income or minority populations would be the same as for the general population, regardless of low-income or minority status. Compensation for rent differentials includes additional considerations for low-income households as described in the Sound Transit Residential Relocation Handbook (Sound Transit 2023).</li> <li>Property impacted temporarily for construction would be restored to its previous condition.</li> </ul>	<ul style="list-style-type: none"> <li>In general, properties acquired are in areas where minorities and low-income people reside and work. Some individuals from these populations are likely to be affected.</li> <li>Business displacements from the Tacoma Close to Sounder Alternative would impact businesses at Freighthouse Square. Based on Sound Transit's outreach, some of these impacted business owners and employees are immigrants and minorities.</li> </ul>	None.
	<b>South Federal Way (SF) Segment</b> <ul style="list-style-type: none"> <li>SF Enchanted Parkway: 14 business displacements and 40 residential displacements.</li> <li>SF I-5: 7 business displacements and 3 residential displacements.</li> <li>SF 99-West: 25 business displacements and 17 residential displacements.</li> <li>SF 99-West with Porter Way Design Option: 23 business displacements and 17 residential displacements.</li> <li>SF 99-East: 25 business displacements and 2 residential displacements.</li> <li>SF 99-East with Porter Way Design Option: 24 business displacements and 2 residential displacements.</li> </ul>			
	<b>Fife Segment</b> <ul style="list-style-type: none"> <li>Fife Pacific Highway: 38 business displacements and 3 residential displacements.</li> <li>Fife Pacific Highway with 54th Avenue Design Option: 50 business displacements and 3 residential displacements.</li> <li>Fife Pacific Highway with 54th Span Design Option: 54 business displacements and 3 residential displacements.</li> <li>Fife Median: 12 business displacements and 3 residential displacements.</li> <li>Fife Median with 54th Avenue Design Option: 24 business displacements and 3 residential displacements.</li> <li>Fife Median with 54th Span Design Option: 28 business displacements and 3 residential displacements.</li> <li>Fife I-5: 17 business displacements and 3 residential displacements.</li> <li>Fife I-5 with 54th Avenue Design Option: 34 business displacements and 3 residential displacements.</li> <li>Fife I-5 with 54th Span Design Option: 40 business displacements and 3 residential displacements.</li> </ul>			
	<b>Tacoma Segment</b> <ul style="list-style-type: none"> <li>Preferred Tacoma 25th Street-West: 9 business displacements and 0 residential displacements.</li> <li>Tacoma 25th Street-East: 9 business displacements and 0 residential displacements.</li> <li>Tacoma Close to Sounder: 43 business displacements and 0 residential displacements.</li> <li>Tacoma 26th Street: 13 business displacements and 0 residential displacements.</li> </ul>			

**Table C6-1 Summary of Potential Project Impacts and Mitigation (continued)**

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
<b>Land Use</b>	<ul style="list-style-type: none"> <li>TDLE is generally consistent with all local comprehensive plans and could indirectly contribute to changes to zoning or development throughout the corridor, which cannot be fully foreseen or attributed to TDLE.</li> <li>Under all alternatives, properties acquired would convert to a transportation use.</li> </ul>	No mitigation required.	No impacts.	See Section 5.3, Indirect Impacts.
<b>Economics</b>	<ul style="list-style-type: none"> <li>All build alternatives would involve displacement of businesses and employees, as well as acquisition of commercial, industrial, and institutional properties, which could result in some change in economic activity at or near the build alternatives. See Acquisitions, above.</li> <li>Construction-related disruptions to traffic, transit operations, freight access, nonmotorized access, and the availability of nearby parking could negatively impact business operations within the construction vicinity. Navigation and fishing could be temporarily disrupted during construction.</li> </ul>	<p>Relocation assistance for business displacements is discussed in Section 4.1, Acquisitions, Displacements, and Relocations.</p> <p>Sound Transit would take measures to minimize impacts during construction to respond to the needs of businesses. These measures could include:</p> <ul style="list-style-type: none"> <li>Provide a 24-hour construction telephone hotline.</li> <li>Provide business cleaning services on a case-by-case basis.</li> <li>Provide detour, open for business, and other signage as appropriate.</li> <li>Establish effective communications with the public through measures such as in-person and remote meetings, construction updates, alerts, and schedules.</li> <li>Implement promotion and marketing measures to help affected business districts maintain their customer base, consistent with Sound Transit policies, during construction.</li> <li>Maintain access as much as possible to each business and coordinate with businesses during times of limited access.</li> <li>Facilitate cross-jurisdictional meetings during construction planning and implementation to minimize impacts and coordinate communication with businesses.</li> <li>Coordinate with local jurisdictions on holiday moratoriums.</li> <li>Provide an ombudsman consistent with Sound Transit policy. In the event that complaints arise about construction impacts that cannot be resolved by community outreach staff or the relevant department director, the ombudsman policy provides a process for addressing</li> </ul>	<ul style="list-style-type: none"> <li>In general, based on the types of businesses displaced and the demographic characteristics of the corridor, some displaced businesses may be minority owned and some employees of displaced businesses could be minority and/or low-income persons.</li> <li>Business and employee displacements from the Tacoma Close to Sounder Alternative would impact businesses and employees at Freighthouse Square. Some of these impacted business owners and employees are immigrants and minorities. Impacts are likely to be the same as for the non-minority and non-low-income population in the study area.</li> <li>Navigation and fishing could be temporarily disrupted during construction, particularly related to the rights of the Puyallup Tribe of Indians.</li> </ul>	<ul style="list-style-type: none"> <li>Improved access to employment centers and expanded employment opportunities for minority and low-income persons residing in the project corridor.</li> <li>Construction could generate \$1.09 billion to \$1.15 billion in direct expenditures and annual employment of 9,300 to 9,900 jobs in the region. Sound Transit includes project labor agreements and has a Disadvantaged Business Enterprise program to support the hiring persons of color, with a goal to eliminate barriers, create opportunities, and build capacity for underrepresented and women-owned businesses.</li> <li>Improved access to minority-owned businesses near station locations once TDLE is in operation.</li> </ul>



**Table C6-1 Summary of Potential Project Impacts and Mitigation (continued)**

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
		those complaints in an impartial, fair, and timely manner that ensures effective stewardship of public resources and minimizes construction impacts.		
<b>Social Resources, Community Facilities, and Neighborhoods</b>	<p>All alternatives would result in acquisitions and displacements of businesses and residences as well as temporary construction impacts (such as increased noise, vibration, and visual impacts) and traffic revisions. These impacts could be disruptive to the cohesion and social interaction of employees and residents within those communities.</p> <p><b>Federal Way Segment</b></p> <ul style="list-style-type: none"> <li>Preferred FW Enchanted Parkway: two parcels affected by acquisition contain social resources, including Federal Way/S 320th Street Park and Ride, as well as mobile homes in the Belmor Mobile Home Park (Belmor), which could be disruptive to community cohesion.</li> <li>Preferred FW Enchanted Parkway with Design Option: the same two social resources affected by the Preferred FW Enchanted Parkway Alternative would be affected with the Design Option. This alternative would have more displacements in Belmor than the Preferred SF Enchanted Parkway.</li> </ul> <p><b>South Federal Way Segment</b></p> <ul style="list-style-type: none"> <li>All of the alternatives in the South Federal Way Segment, except for the SF I-5 Alternative, would affect the Future King County Emergency Shelter (former Red Lion Inn) and place columns on the parcel including Seattle Children's South Clinic.</li> <li>Both the SF 99-West and SF 99-East alternatives would also affect the Montessori Academy at Spring Valley and the Giac Vien Temple.</li> <li>The SF I-5 Alternative may affect community cohesion at CrossPointe Apartments due to residential displacements.</li> <li>Adding the Porter Way Design Option would not change impacts to social resources.</li> </ul> <p><b>Fife Segment</b></p> <ul style="list-style-type: none"> <li>Fife Pacific Highway Alternative would affect parcels that contain social resources. This includes the Puyallup Tribal Integrative Medical Building, Fife Business Park (which includes Serenity Counseling Services), Fife Square Shopping Center (including a U.S. Postal Service office), Telecare, Fife License and Title, and St. Paul Chong Hasang Church.</li> <li>Fife Median Alternative would affect the same social resources as the Fife Pacific Highway Alternative but could also make left turns more difficult for drivers on Pacific Highway. The Fife Median Alternative would have similar impacts to the social resources as the Fife Pacific Highway Alternative.</li> <li>Fife I-5 Alternative would affect parcels that contain social resources. These would encompass the Fife Business Center (which includes New Community Church), Fife Business Park (which includes Serenity Counseling Services), Fife Square Shopping Center (which includes a U.S. Postal Office), Telecare,</li> </ul>	<ul style="list-style-type: none"> <li>Relocation assistance for business and residential displacements are discussed in Section 4.1, Acquisitions, Displacements, and Relocations.</li> <li>Mitigation measures to address project impacts to neighborhoods are described throughout this Draft EIS, including in Chapter 3, Transportation, Section 4.5, Visual and Aesthetic Resources, Section 4.7, Noise and Vibration, and Section 4.14. Public Services.</li> </ul>	<ul style="list-style-type: none"> <li>In the South Federal Way Segment, the SF Enchanted Parkway Alternative would displace the future King County Emergency Shelter (former Red Lion Inn). The SF 99-West and SF 99-East alternatives would add columns and elevated guideway on and near the parcel but would not displace the shelter. With all three alternatives, guideway columns would be constructed on the Seattle Children's South Clinic parcel, but long-term impacts are not anticipated.</li> <li>All alternatives in the Fife Segment would displace a residential unit associated with the St. Paul Chong Hasang Church, and place columns on either the north or south end of the Puyallup Tribal Integrative Medical Building parcels.</li> <li>Distribution of impacts to minority and low-income populations would be similar to the distribution of impacts to the general public. However, the study area includes higher percentages of environmental justice populations compared to non-environmental justice populations.</li> </ul>	All alternatives would benefit communities, including minority and low-income people, through the improved access, reliability, connectivity, and service frequency to transit.

**Table C6-1 Summary of Potential Project Impacts and Mitigation (continued)**

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
	<p>Chateau Rainier, and St. Paul Chong Hasang Church. The Fife I-5 Alternative would have the most small-business impacts of the Fife alternatives.</p> <ul style="list-style-type: none"> <li>Only the 54th Avenue Span Station Option would also impact the New Horizon Christian Center.</li> </ul> <p><b>Tacoma Segment</b></p> <ul style="list-style-type: none"> <li>Preferred Tacoma 25th Street-West and Tacoma 25th Street-East alternatives would affect parcels that contain social resources, including the Tacoma Soccer Center and South Sound Martial Arts.</li> <li>Tacoma Close to Sounder Alternative would affect the same resources as the Tacoma 25th Street West Alternative, with the addition of impacts to Freighthouse Square, which would displace about 31 businesses.</li> <li>Tacoma 26th Street Alternative would affect the same resources as the Tacoma 25th Street-West Alternative.</li> </ul>			
<b>Visual and Aesthetic</b>	<ul style="list-style-type: none"> <li>All the build alternatives would change visual conditions by removing existing landscape features, including trees, landscaping, and buildings; addition of overhead utilities; modification of streets, bridges, or other facilities; and addition of elevated sections of guideway.</li> <li>The visual change would be high for some residents near prominent structures and who have direct views of the new light rail facilities.</li> <li>Where mature vegetation framing the roadway is removed, viewers may perceive the highway corridor as wider and more prominent, and it can change the visual context of adjacent residential areas by removing the buffer from the transportation corridor and replacing it with a transportation facility.</li> </ul>	Light rail facility design and use of landscaping would be used to soften or screen visual impacts. Examples include sound walls, landscaping between guideway columns, and context-sensitive design features at stations. Tree removal within the I-5 corridor would be mitigated according to the WSDOT Roadside Policy Manual. Exterior lighting of facilities would be designed to minimize height and use source shielding to avoid lighting (bulbs) that would be directly visible from residential areas, streets, and highways.	<ul style="list-style-type: none"> <li>High visual impacts are expected at Pierce County Housing Authority's Chateau Rainier Apartments in the Fife segment.</li> <li>The Puyallup River in the Fife Segment is important for the Puyallup Tribe of Indians, and viewers near the river would be sensitive to visual change.</li> </ul>	None.
<b>Air Quality and Greenhouse Gas Emissions</b>	<ul style="list-style-type: none"> <li>When compared with the No-Build Alternative, the build alternatives would decrease the criteria pollutant emissions within the project area.</li> <li>All alternatives would result in short-term degradation of air quality resulting from emissions of construction equipment. These impacts would be greatest during the site preparation phase when equipment is most active.</li> </ul>	No mitigation is required beyond typical construction best management practices (BMPs).	No impacts.	Benefits to air quality and greenhouse gas emissions would be similar for all alternatives and benefit the region, including minority and low-income people and people who have been historically more exposed to negative environmental health effects, including air quality. Improvement to air quality could reduce existing environmental health disparities in the study area.

**Table C6-1 Summary of Potential Project Impacts and Mitigation (continued)**

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
<b>Noise and Vibration</b>	<p>All alternatives include noise and vibration sensitive properties that would be impacted during construction and operation. Potential noise and vibration impacts prior to mitigation include:</p> <p><b>Federal Way Segment</b></p> <ul style="list-style-type: none"> <li>Preferred FW Enchanted Parkway Alternative: 25 moderate and no severe noise impacts, and no vibration impacts.</li> <li>FW Enchanted Parkway Alternative with Design Option: 40 moderate and 2 severe noise impacts, and no vibration impacts.</li> </ul> <p><b>South Federal Way Segment</b></p> <ul style="list-style-type: none"> <li>SF Enchanted Parkway Alternative: 74 moderate and 76 severe noise impacts, and no vibration impacts.</li> <li>SF I-5 Alternative: 9 moderate noise impacts and no severe noise impacts, and no vibration impacts.</li> <li>SF 99-West: 22 moderate and 5 severe noise impacts, and no vibration impacts.</li> <li>SF 99-East: 23 moderate and 3 severe noise impacts, and no vibration impacts.</li> <li>SF 99-West and SF 99-East alternatives with the Porter Way Design Option would have 20 moderate noise impacts and 3 to 4 severe noise impacts, and no vibration impacts.</li> </ul> <p><b>Fife Segment</b></p> <ul style="list-style-type: none"> <li>Fife Pacific Highway Alternative: 178 moderate and 3 severe noise impacts, and 2 vibration impacts.</li> <li>Fife Pacific Highway with 54th Avenue Design Option: 176 moderate and 3 severe noise impacts, and 2 vibration impacts.</li> <li>Fife Pacific Highway with 54th Span Design Option: 182 moderate and 4 severe noise impacts, and 2 vibration impacts.</li> <li>Fife Median Alternative: 178 moderate noise impacts, 3 severe noise impacts, and 1 vibration impact.</li> <li>Fife Median with 54th Avenue Design Option: 176 moderate and 3 severe noise impacts, and 1 vibration impact.</li> <li>Fife Median with 54th Span Design Option: 182 moderate and 4 severe noise impacts, and 1 vibration impact.</li> <li>Fife I-5 Alternative: 89 moderate and 2 severe noise impacts, and 1 vibration impact.</li> <li>Fife I-5 Alternative with 54th Avenue Design Option: 88 moderate and 2 severe noise impacts, and 1 vibration impact.</li> <li>Fife I-5 Alternative with 54th Span Design Option: 94 moderate and 3 severe noise impacts, and 1 vibration impact.</li> </ul> <p><b>Tacoma Segment</b></p> <ul style="list-style-type: none"> <li>Preferred Tacoma 25th Street-West Alternative: 1 moderate and 2 severe noise impacts, and no vibration impacts.</li> <li>Tacoma 25th Street-East Alternative: Same as Tacoma 25th Street-West Alternative.</li> <li>Tacoma Close to Sounder Alternative: 1 moderate and 1 severe noise impact, and no vibration impacts.</li> <li>Tacoma 26th Street Alternative: 1 moderate and 2 severe noise impacts, and no vibration impacts.</li> </ul>	<ul style="list-style-type: none"> <li>All noise and vibration impacts would be mitigated consistent with FTA and Sound Transit policies. No significant adverse impacts are anticipated after mitigation.</li> <li>Noise mitigation measures would be developed in accordance with the Sound Transit Link Noise Mitigation Policy (Sound Transit 2004) and could include noise barriers and building sound insulation.</li> <li>In the Fife Segment, additional testing to determine specific vibration mitigation for buildings on one or two parcels (depending on the alternative) would be conducted as the design progresses and finalized during final design.</li> </ul>	<p>Distribution of impacts to minority and low-income populations would be similar to the distribution of impacts to the non-minority and non-low-income populations within the study area. However, the study area includes higher percentages of environmental justice populations compared to non-environmental justice populations.</p>	None.

**Table C6-1 Summary of Potential Project Impacts and Mitigation (continued)**

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
<b>Water Resources</b>	<ul style="list-style-type: none"> <li>All alternatives would increase impervious surfaces. These surfaces are associated with an increase in runoff volumes, which may increase flooding and flow frequencies. The increased flow volumes and water quality impairments can contribute to stream erosion and aquatic habitat degradation. However, the project would be designed to comply with all federal, state, and local regulations controlling potential risks to water resources through project planning, design, and use of required BMPs to avoid operational and construction-related adverse impacts on water resources.</li> <li>Construction activities such as earthwork, trench work, material transport, concrete work and paving, stream crossings, in-water work, and construction equipment leaks could affect water resources.</li> </ul>	<ul style="list-style-type: none"> <li>For unavoidable long-term impacts on wetland, streams or buffers, Sound Transit would develop a compensatory mitigation plan, which could include compensatory flood storage, for ecosystems resources during the permitting phase in accordance with applicable federal, state, local, and Tribal requirements. This mitigation plan is described in more detail in Section 4.9.4, Ecosystems.</li> <li>Sound Transit would comply with standard specifications; BMPs; and applicable Tribal, federal, state, and local mitigation requirements during construction activities. Compensatory wetland mitigation would be provided for construction impacts lasting more than one growing season.</li> </ul>	No impacts.	None.
<b>Ecosystems</b>	<ul style="list-style-type: none"> <li>TDLE may result in permanent loss or degradation of in-stream or riparian habitat; altered hydrology; water quality degradation; impacts to habitat connectivity, vegetation, wildlife habitat, wetlands and buffers; and forest cover.</li> <li>All of the alternatives in the Tacoma Segment would include a new over-water bridge across the Puyallup River. Depending upon the design, new in-water piers may be required.</li> </ul>	<ul style="list-style-type: none"> <li>The project would be designed to comply with all federal, state, and local regulations controlling potential risks to ecosystem resources through project planning design and use of required BMPs to avoid operational and construction-related adverse impacts on ecosystem resources.</li> <li>For unavoidable long-term impacts on wetlands, streams, and their buffers, Sound Transit would develop a compensatory mitigation plan during the permitting phase in accordance with applicable federal, state, local, and Tribal requirements and guidelines.</li> <li>Compensatory mitigation would be provided for construction impacts lasting more than one growing season and for permanent conversion of wetlands from one vegetation type to another (e.g., forested wetland to emergent or scrub-shrub wetland) as well as for indirect impacts on wetlands.</li> </ul>	No impacts.	None.
<b>Energy Resources</b>	<ul style="list-style-type: none"> <li>No long-term impacts are anticipated, as operation of TDLE is expected to consume less energy overall than the No-Build Alternative.</li> <li>Energy-related impacts during construction of TDLE would be short term in nature and are not expected to be adverse.</li> </ul>	No mitigation is required beyond typical construction BMPs.	No impacts.	None.

**Table C6-1 Summary of Potential Project Impacts and Mitigation (continued)**

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
<b>Geology and Soils</b>	<p>The following long-term effects related to the completion of the TDLE project could occur:</p> <ul style="list-style-type: none"> <li>Engineered structures related to the project would require design to withstand a major seismic event.</li> <li>Changes to local topography and drainage patterns could affect slope stability.</li> <li>Minor settlement could affect near-surface features.</li> <li>Corrosive soils could compromise steel structures (applicable soils data were not available for the Tacoma Segment).</li> </ul> <p>During construction, soils susceptible to erosion, shallow groundwater, and areas of geologic hazard would be encountered. Geology and soils risks would be avoided or minimized with the use of engineering design standards and BMPs. Erosion would be managed using BMPs.</p>	Risks would be avoided or minimized using engineering design standards and best management practices.	No impacts.	None.
<b>Hazardous Materials</b>	<ul style="list-style-type: none"> <li>All alternatives include property acquisition of parcels with a risk of contamination. Contaminated soils and groundwater may be encountered and require control.</li> <li>Construction activities could use hazardous materials that could spill.</li> </ul>	<ul style="list-style-type: none"> <li>Environmental due diligence (including a Phase 1 Environmental Site Assessment) would be performed for properties along the corridor before acquisition or construction to avoid or minimize impacts from contaminated sites.</li> <li>Contractors would be required to develop project-specific plans to implement BMPs to ensure management of hazardous materials during construction is consistent with state and federal regulations.</li> <li>Applicable BMPs during construction would include construction stormwater pollution prevention plans, spill control and prevention plans, and contaminated media management plans.</li> </ul>	Distribution of impacts to minority and low-income populations would be similar to the distribution of impacts to the non-minority and non-low-income populations within the study area. However, the study area includes higher percentages of environmental justice populations compared to non-environmental justice populations.	Cleanup of contaminated sites by the project could remove contamination in areas where minority and low-income populations could be exposed to contamination.
<b>Electromagnetic Fields</b>	<ul style="list-style-type: none"> <li>The TDLE study area contains no sensitive facilities with equipment susceptible to electromagnetic interference.</li> <li>BPA 500 kV and 230 kV high-voltage transmission lines are located in proximity to alignment and potential sites for the future Operations and Maintenance Facility South (OMF South); transmission lines and towers would need to be modified.</li> </ul>	No mitigation is required beyond typical construction BMPs.	No impacts.	None.
<b>Public Services</b>	<p>For all alternatives:</p> <ul style="list-style-type: none"> <li>The increase in traffic volumes, transit movements, pedestrians, and bicyclists near each of the stations could increase the risk of traffic conflicts and conflicts among travel modes, necessitating involvement from emergency and incident response.</li> <li>No adverse impacts are anticipated on solid waste collection and disposal, schools, or other governmental facilities.</li> </ul>	No mitigation is required beyond typical construction BMPs.	Distribution of impacts to minority and low-income populations would be similar to the distribution of impacts to the non-minority and non-low-income populations within the study area. However, the study area includes higher percentages of environmental justice populations compared to non-environmental justice populations.	None.

**Table C6-1 Summary of Potential Project Impacts and Mitigation (continued)**

Resource	Impacts Summary	Minimization and Mitigation Summary	Impacts on Minority and Low-Income People	Benefit(s) to Minority and Low-Income People
<b>Utilities</b>	<ul style="list-style-type: none"> <li>All alternatives would result in greater usage of electricity through the maintenance and operation of trains, stations, and general safety lighting throughout the alignment.</li> <li>Stray electromagnetic currents traveling through the project could result in corrosion to susceptible underground utilities within the project footprint.</li> <li>Utility relocations would be necessary during construction.</li> </ul>	<p>Sound Transit would coordinate with utility providers to identify appropriate control measures to avoid or minimize potential corrosion impacts. Typical design measures include installing cathodic protection systems, installing insulating unions to break the electrical conductivity of the utility, isolating electrical rails from the ground, and installing stray-current-control track fastening systems, where appropriate.</p> <p>No additional mitigation beyond the avoidance and minimization measures is anticipated.</p>	Distribution of impacts to minority and low-income populations would be similar to the distribution of impacts to the non-minority and non-low-income populations within the study area.	None.
<b>Historic and Archeological Resources</b>	<p>Potential adverse impacts to historic built-environment properties:</p> <ul style="list-style-type: none"> <li>FW Enchanted Parkway Alternative, with and without the SF Design Option: no adverse effects.</li> <li>SF Enchanted Parkway and SF I-5 alternatives: no adverse effects.</li> <li>SF 99-West Alternative, with or without the Porter Way Design Option: four resources potentially affected.</li> <li>SF 99-East Alternative, with or without the Porter Way Design Option: two resources potentially affected.</li> <li>Fife Pacific Highway Alternative: two resources potentially adversely affected.</li> <li>Fife Median Alternative: one resource adversely affected.</li> <li>Fife I-5 Alternative: one resource adversely affected.</li> <li>Preferred Tacoma 25th Street-West, Tacoma 25th Street-East, and Tacoma Close to Sounder, and Tacoma 26th Street alternatives: no adverse effects.</li> </ul> <p>Based on preliminary project designs, the project has the potential to adversely affect four archaeological resources. Specifically, the SF Enchanted Parkway and SF I-5 alternatives would adversely affect one eligible resource, all of the alternatives in the Fife Segment could adversely affect a potentially eligible resource, and all of the alternatives in the Tacoma Segment could adversely affect two eligible resources in Tacoma. The SF Enchanted Parkway and SF I-5 could also potentially impact culturally sensitive portions of St. George's Cemetery.</p>	FTA and Sound Transit are developing a programmatic agreement to resolve unavoidable adverse effects, consistent with Section 106 of the National Historic Preservation Act. Efforts may include preparing additional documentation or interpretation for the resources, designing/installing an interpretive/educational display or exhibit, or preparing an NRHP nomination and will be coordinated with Tribes and consulting parties.	The SF Enchanted Parkway and SF I-5 alternative could impact Indigenous populations who ascribe particular importance to the St. George's Cemetery. For all other alternatives, distribution of impacts to minority and low-income populations would be similar to the distribution of impacts to the non-minority and non-low-income populations within the study area.	None.
<b>Park and Recreational Resources</b>	<ul style="list-style-type: none"> <li>No long-term impacts to existing park and recreational resources, but potential impact to planned Cappa Park from all Fife Alternatives.</li> <li>Access to parks may be temporarily impacted during construction.</li> <li>No impacts to Section 6(f) or Recreation or Conservation Office grant-funded properties would occur.</li> </ul>	No mitigation is required beyond typical construction BMPs.	No impacts.	Access to parks and recreational activities could improve, particularly the planned Foss Waterway Park.



## 6.2 Relocation and Acquisition Impacts

During the environmental review process, Sound Transit developed preliminary estimates for acquisitions and relocations using conceptual designs for the TDLE build alternatives. As the project continues to progress, these estimates will be refined.

In the Federal Way Segment, TDLE would not displace any businesses, but the FW Enchanted Parkway Alternative with FW Design Option would require more residential displacements than the FW Enchanted Parkway Alternative without the Design Option. The residential displacements with either alternative in the Federal Way Segment would occur within Belmor, a manufactured/mobile home community for people aged 55 and over. The population in the block group where the residential displacements would occur is 46 percent minority and 23 percent low income, which is slightly higher than the Sound Transit District as a whole, but lower than within the Federal Way Segment as a whole.

In the South Federal Way Segment, the SF Enchanted Parkway Alternative would have the most residential displacements, and the SF 99-East and SF I-5 alternatives would have the least. The SF 99-East and SF 99-West alternatives would displace the most businesses, and the SF I-5 Alternative would displace the fewest. The minority and low-income population in the areas where displacements would occur are higher than within the Sound Transit District as a whole. The SF Enchanted Parkway Alternative would fully acquire a former hotel near the corner of S 348th Street and 16th Avenue S. This property was purchased by King County in 2021 and is transitioning to an 84-bed emergency shelter. The opening date for the emergency shelter has not been established.

In the Fife Segment, all of the alternatives would displace three residences. One of the residential displacements for all of the build alternatives includes a priest's residence associated with St. Paul Chong Hasang Church. The Fife I-5 Alternative would also affect the parking lot of the Chateau Rainier Apartments, an affordable housing complex managed by the Pierce County Housing Authority; however, no residential displacements would occur. The Fife Pacific Highway with 54th Span Design Option would displace the most businesses, and the Fife Median Alternative would displace the fewest.

No residential displacement would occur in the Tacoma Segment with any of the build alternatives. The Tacoma Close to Sounder Alternative would displace the most businesses, including the businesses located in Freighthouse Square, which are predominately small, minority-owned businesses.

After the Sound Transit Board selects the project to be built and the real estate process moves forward, a detailed residential occupancy survey will be completed for all potentially affected property owners and tenants. The purpose of this survey is to determine specific needs of those being relocated, and it includes questions about income, ethnicity, family size, and replacement preferences.

### Avoidance, Minimization, and Mitigation

Conceptual designs for TDLE would locate the project near or within public rights-of-way, where possible, and consider other measures to avoid or reduce the number of private property impacts.

For all residential relocations, a qualified relocation agent is assigned to work with each resident through the process of relocation and transition to replacement housing. The goal of the relocation agents is to facilitate a smooth transition to replacement housing. A relocation agent

would contact each resident personally to explain relocation assistance, eligibility, and entitlements. For all relocations, a Sound Transit relocation agent would interview the affected individuals to:

- Determine any special needs and requirements.
- Explain the relocation process, entitlements, and payments.
- Offer relocation advisory assistance.
- Offer transportation, if necessary.
- Offer language translation services, as necessary.
- Ensure the availability of at least one comparable property in advance of displacement.
- Provide referral to comparable properties.
- Provide the amount of the maximum replacement housing entitlement and the basis for the determination in writing 90 days or more before the required vacate date.
- Inspect replacement properties to ensure they meet the Uniform Relocation Act's standards for decency, safety, and sanitary acceptability.
- Supply information on other federal, state, and local programs that offer assistance to displaced persons.
- Minimize hardship to persons adjusting to relocation by providing reimbursement for counseling services and advice on other sources of assistance that may be available.
- Recommend obtaining and provide reimbursement for a professional home inspection when purchasing a replacement dwelling.

Sound Transit's property acquisition and relocation handbooks for residential and nonresidential properties detail the agency's compensation and acquisition procedures (Sound Transit 2014a, 2014b). Sound Transit would pay normal expenses of sale, including escrow fees, title insurance, prepayment penalties, mortgage release fees, recording fees, and typical costs incurred as part of conveying title. In addition to compensating owners for property rights, other forms of compensation could include moving expenses, replacement housing payments, nonresidential reestablishment, and other eligible expenses. The relocation agent would also explain and provide the displaced person with information about the process for filing an appeal, should they disagree with any entitlement or decision made regarding their relocation.

Residents who own their home may be eligible for a purchase price differential in addition to the acquisition price paid for their property if the available comparable housing is more than the value of their current property. Additionally, they may be eligible to receive a mortgage interest differential payment if the interest rate on their new mortgage exceeds their present mortgage rate.

Residents who rent their home are eligible for a rent supplement if the rent plus utilities of the selected comparable is higher than their current rent plus utilities. A rent supplement is designed to enable a resident to rent a comparable replacement dwelling for a 3.5-year period (42 months). The resident could elect to receive the full value of the rent supplement at once in order to use it as a down payment to purchase a home and to pay certain incidental expenses to purchase a replacement dwelling. This creates a potential opportunity for someone who is currently renting their home to purchase a home if they are interested.

Additional considerations are given for residents who rent their home and are determined to be low-income based on the Uniform Relocation Act income limits (generally, low income for

Uniform Act purposes is income that does not exceed 80 percent of the median family income for the applicable area, as determined by the U.S. Department of Housing and Urban Development). The basis for the calculated entitlement for those residents who rent their homes and are determined to be low income is their rent plus utilities, or 30 percent of their income, whichever is less. This would result in the same or better rental assistance payment as someone who is not determined to be low income. In most cases, 30 percent of their income is less than the current rent plus utilities. This can result in a larger rental assistance payment.

For business relocations, adequate commercial and industrial spaces may be available in the market to relocate building owners and tenants displaced as part of the project. Industrial users requiring specific lot sizes and utilities may be more difficult to relocate. Businesses and nonprofit organizations displaced by the project would be offered relocation assistance, advisory services, and monetary benefits. Qualified relocation agents are assigned to work with displaced business throughout the process of locating a replacement property and making the transition to the new location. The goal of the relocation agent is to assist the displaced business or nonprofit organization in locating a replacement site and successfully completing their move. A relocation agent would personally visit each displaced business to explain the following:

- Explain relocation services and payments available, eligibility requirements, and procedures for obtaining assistance.
- Determine the relocation needs and preference for the operation by completing an occupancy survey form.
- Offer language translation services, as necessary.
- Provide advice on other sources of assistance and technical help.
- Explain substitute personal property and actual direct loss of tangible personal property so that the business owner can make informed decisions regarding the relocation.

The level of advisory services may be different for each displaced business depending on the complexity of the business operation. Sound Transit would provide information on the availability, purchase price, and rental costs of suitable commercial properties and locations or refer the displaced business to real property specialists in the area. The relocation agent would assist a business to become established in a replacement location. Businesses are eligible to receive relocation benefits including moving expenses, reestablishment expenses, or a fixed moving payment. Reestablishment expenses of up to a maximum of \$50,000 may include, but are not limited to:

- Repairs or improvements to the replacement real property as required by federal, state, local law, codes, or ordinances.
- Modifications to the replacement property to accommodate the business operation or make replacement structure suitable for conducting the business.
- Construction and installation costs, for exterior signing to advertise the business.
- Redecoration or replacement of soiled or worn surfaces (e.g., carpeting, paneling, or painting).
- Advertising of replacement location.
- Estimated increased costs for 2 years at the replacement site for such items as lease or rental charges, personal or real property taxes, insurance premiums, and utility charges (excluding impact fees).

Additionally, if they prefer, businesses may be eligible for a fixed payment in lieu of moving, site search, and reestablishment expenses. The fixed payment is based on the average net earnings of the business for 2 taxable years immediately preceding the taxable year in which it would be displaced. The fixed payment entitlement is a minimum of \$1,000 and a maximum of \$40,000.

### 6.3 General Construction Impacts

Construction of TDLE would result in short-term construction impacts to communities throughout the project corridor, including neighborhoods and commercial districts. These impacts could include additional noise, dust, impacts to traffic patterns and access, visual impacts, and land use changes related to the preparation of work sites and staging areas, including the installation of temporary fencing, job trailers, and required safety and work-site isolation measures, clearing and grading activity, movement of materials, and activities associated with periodic nighttime construction.

As a result of these impacts, these communities would be exposed to elevated levels of noise, visual, traffic, and particulate conditions. This may result in reduced access to neighborhoods and commercial districts, disrupting both social cohesion and current economic activity. These temporary construction impacts have the potential to impact minority and low-income people more adversely if a population has limited access to alternative transportation modes, economic opportunity, access to goods and services, and social support network compared with the non-minority and non-low-income population in the study area.

Construction of TDLE would require property for staging, construction access, and temporary construction easements in each segment. Most of these construction needs would be accommodated within property required for permanent right-of-way, but some additional properties could be affected. Properties required for short-term construction staging and access would be directly impacted during construction.

Temporary changes to the existing traffic patterns and road network during construction would have impacts to public services. This would likely include longer response times for police, fire, and emergency medical vehicles; solid waste collection vehicles; school buses; and transit services.

Short-term construction impacts would be limited in duration, and Sound Transit is committed to working with community stakeholders and service providers to minimize and mitigate these impacts. Based on this analysis, short-term construction impacts would not result in disproportionate and adverse effects on environmental justice populations.

### 6.4 Indirect Impacts

TDLE could increase economic activity in areas near stations, resulting in increased development and redevelopment potential and higher density and mixed land uses, where zoning allows, which could potentially increase property value and create additional employment opportunities. Such indirect impacts could be beneficial for environmental justice populations in the study area. However, displacement of housing and existing businesses may also occur as a result of new development patterns that increase rents or saturate the local market area with similar businesses, which could adversely impact environmental justice populations in the study area. Affordable housing goals and policies of local jurisdictions and Sound Transit would encourage affordable housing options and would help mitigate adverse impacts.

## 6.5 Cumulative Impacts

TDLE, in addition to the Federal Way Link Extension and OMF South projects and other investments in regional transportation infrastructure, would improve mobility within the region in addition to improved local connections to economic opportunity, goods, and services. Additional projects such as the City Center Access Project and the SR 167 Completion project would also modify and improve mobility in the area. The confluence of these reasonably foreseeable actions would be considered a benefit to low-income and minority people in the study area and to the Puget Sound region as a whole.

In addition, cumulative impacts from reasonably foreseeable commercial and residential development projects and proposed land use changes could result in benefits to communities within the study area, including those composed of minority and low-income populations. These benefits could include improved access to a regional high-capacity transit network, residential infill, growth in employment base, and greater support of local businesses, especially to communities in proximity to future transit station areas. Future private development in response to transportation investments and corresponding development activities could increase property values and taxes; however, it may also result in gentrification and loss of affordable housing. Affordable housing goals and policies of local jurisdictions and Sound Transit would encourage affordable housing options and help mitigate cumulative impacts.

If TDLE were constructed at similar times as other large infrastructure projects, residents and businesses could experience increased short-term construction impacts due to cumulative increases in congestion, noise, and access limitations. Impact minimization, best management practices, and mitigation measures would be implemented to reduce cumulative construction impacts on affected residences and businesses.

To help inform the cumulative impact analysis, Sound Transit used EPA's EJScreen tool. EJScreen is a mapping tool that combines environmental and demographic socioeconomic indicators. It assesses the following 13 environmental indicators: particulate matter 2.5, ozone, diesel particulate matter, air toxics cancer risk, air toxics respiratory hazard index, toxic release to air, traffic proximity, lead paint, risk management plan facility proximity, hazardous waste proximity, superfund proximity, underground storage tanks, and wastewater discharge. It also includes supplemental indexes to offer a perspective on the community-level vulnerability based on income, employment, limited English speaking, education, and life expectancy.

The EJScreen tool identified that the TDLE study area is in the 80th and 90th percentiles for many of the indexes when compared to national and state data. This indicates that the study area has been historically overburdened and there is a high potential for future projects to have cumulative impacts. Additional information is included in the EJScreen Reports in Attachment C1. Note that the census block results presented by EJScreen are actually census tract values distributed homogeneously across all census blocks within a census tract. As described in Section 3.2 above, this environmental justice analysis uses demographic data at the block group level to provide a more accurate portrayal of environmental justice populations within the project study area, given the localized nature of the project's potential impacts.

Sound Transit analyzed potential direct and cumulative impacts of TDLE related to the environmental justice indicators, including air quality, traffic, hazardous materials, and wastewater, as discussed in the Draft EIS in Chapter 4, Affected Environment and Environmental Consequences, and in Chapter 5, Cumulative Impacts. Based on this analysis, TDLE is anticipated to improve rather than negatively impact the EJScreen environmental indicators and is not anticipated to contribute to adverse cumulative impacts.

## 7 PROJECT BENEFITS

Under DOT Order 5610.2C, the benefits of a proposed transportation project may be considered when determining whether any disproportionate and adverse effects on minority and low-income populations would occur. The introduction of light rail service from Federal Way to Tacoma offers improved access to transit and employment, transit travel time savings, increased reliability, connectivity, and frequency, and other benefits. While all populations within the project's service area would realize these benefits to the same extent, they would accrue to a higher degree to minority and low-income populations as described in the following subsections.

If TDLE is constructed in phases, the M.O.S. to the station in South Federal Way Station and, to a lesser degree, the M.O.S. to the station in Fife Station would have the same type of benefits as described in Section 6.1 and 6.2 but would be limited in their accrual to minority and low-income populations until the remaining phases were completed.

### 7.1 Transit Benefits

Improved access to transit would result for all populations within the study area. Extended transit service hours (20 hours per day Monday through Saturday, 18 hours on Sunday) compared with baseline service hours would improve access to transit for all populations within the service area. Train frequency would be every 6 minutes during AM and PM peak hours, every 10 minutes during the midday and evening, and every 10 to 15 minutes in the early morning and evening late-night periods. These improvements would provide a benefit, particularly to transit users who work outside the typical 8 a.m. to 5 p.m. workday and may be faced with limited bus service.

The project would further reduce average transit travel times for users compared with baseline transit travel times. The light rail would operate in an elevated alignment and would not experience delays associated with increased traffic congestion. This would increase transit reliability.

The development and integration of additional pedestrian, bicycle facilities and bus services that provide connections to the stations would also improve access to the transit system. The proposed station locations in the study area would accommodate connections with bus, Sounder, T Line, nonmotorized, and automobile access trips.

A number of studies have documented that minority and low-income populations tend to own fewer personal vehicles and make greater use of transit service than other groups, indicating that the transit service improvements are generally more important to this segment of the population than other groups. Data from the American Public Transportation Association indicate that in 2007, approximately 60 percent of all transit passengers were minority (APTA 2007). With minority and low-income populations taking public transit at a higher rate, the transit operations benefit provided by the project would benefit environmental justice populations to a greater degree than other segments of the population.

With the improvements in travel times, project users would be able to reliably travel longer distances in the same amount of time throughout the region. This would provide access to new employment opportunities that would be more accessible within a typical commute for the region. This benefit is particularly important for populations that may not own a car or are otherwise rely upon transit and cannot use existing bus routes to access many areas in the project vicinity because of the extended travel times or because bus routes do not serve their



destinations well or during off-peak times. The project would also provide reliable connections to the large employment centers of Seattle, Bellevue, and other regional destinations.

Because minority and low-income populations use transit more than other members of the population, increased speed, frequency, connectivity, and reliability would benefit these populations to a greater degree than other segments of the population.

## **7.2 Other Benefits**

The Cities of Federal Way and Fife would each benefit from a new light rail station with connections to Tacoma, Sea-Tac Airport, and Seattle. This would provide the area with a potential community and social hub. These improved regional connections would result in improved access to economic and employment opportunities for environmental justice communities living in the area.

The City of Tacoma would benefit from two new stations at Portland Avenue and near the Tacoma Dome. The station near the Tacoma Dome would serve as a multimodal transit hub, with transfer options to and from Sounder commuter rail service, Amtrak passenger rail service, Greyhound, T Line, and Pierce Transit and Sound Transit buses. Areas surrounding proposed stations could include increased infill development, and the stations and trains would provide meeting points, thereby increasing opportunities for social activity. This would be a positive impact in a community with a somewhat sprawled and disconnected development pattern. TDLE could also improve access to minority-owned businesses near these station locations.

Other social benefits resulting from TDLE include improved connectivity to social services, health services, parks, and recreation in the region. TDLE would also slow the growth of greenhouse gas emissions, as discussed further in Section 4.6, Air and Greenhouse Gas Emissions.

Construction benefits would include new jobs to build the project, the purchase and sale of goods and services within the community to facilitate construction, and the positive economic effects of construction workers' purchases in food and retail within the community. Sound Transit has programs in place that focus on providing opportunities for minority or low-income populations, such as Project Labor Agreements and the Disadvantage Business Enterprise program. Project Labor Agreements promote a commitment to labor stability and a local workforce, apprenticeship and employment goals for people of color and women, and non-discrimination and fairness in employment for both union and non-union contractors and craft workers. Project Labor Agreements require that 20 percent of all hours be set aside for persons of color. The Disadvantage Business Enterprise program requires that 18.2 percent of all construction and architecture/engineering consultant dollars be set aside for small businesses that are at least 51 percent owned by individuals who are socially and economically disadvantaged. New jobs associated with TDLE itself or new development or connectivity between communities would increase community cohesion and interaction and could yield a benefit to environmental justice communities.

## 8 CONCLUSION

FTA and Sound Transit conducted this environmental justice analysis to identify, analyze and address potential disproportionate and adverse human health and environmental effects of TDLE on environmental justice communities. FTA will make the final environmental justice determination for the project following selection by the Sound Transit Board of a project to be built. As described in Section 2, Methods and Approach, FTA's determination considers who may be affected; whether the net results will be disproportionately high after consideration of the totality of the circumstances, including project impacts, mitigation, and benefits; and whether adverse impacts would be predominately borne by environmental justice populations. The determination also includes whether there would be a denial of, reduction in, or significant delay in the receipt of benefits by minority or low-income populations. To determine whether disproportionately high adverse health or environmental impacts exist, FTA considers:

- Whether the adverse effects on environmental justice populations exceed those borne by non-environmental justice populations.
- Whether cumulative or indirect effects would adversely affect an environmental justice population.
- Whether mitigation and enhancement measures will be taken for environmental justice and non-environmental justice populations.
- Whether there are offsetting benefits to environmental justice populations compared to non-environmental justice populations.

The environmental impact analysis for environmental justice populations concludes:

- Sound Transit conducted a robust, meaningful community engagement program that included a demographic analysis to identify low-income and minority populations.
- The study area for all build alternatives includes populations that are predominately minority and low-income. Concentrations of minority and low-income populations in the study are higher than the Sound Transit service district as a whole.
- All build alternatives would result in potential impacts, as described in Table C6-1.
- Sound Transit would mitigate impacts for all populations through the application of measures presented in Chapters 3 and 4 of the Final EIS and summarized above in Table C6-1. Mitigation and enhancement measures would be applied equally between environmental justice and non-environmental justice populations. For project impacts in general, design measures, BMPs, and other mitigation measures discussed throughout the Draft EIS would reduce certain project impacts on all populations, including minority and low-income populations, to levels that would not be adverse.
- The project is anticipated to yield a benefit to environmental justice communities living within the study area by increasing transit reliability, access to transit, connectivity, and frequency, especially to those communities near the proposed station areas. Other benefits include new jobs associated with the construction of the project or with new development indirectly spurred by local and regional investment in light rail. Additional economic opportunities may result from improved connectivity between communities that could yield a benefit to environmental justice communities living within the project area.
- After consideration of the totality of the circumstances, including mitigation, offsetting direct and indirect benefits, and impacts, FTA has preliminarily concluded that the net results of the project would not result in disproportionate and adverse effects on environmental justice populations as defined in Executive Order 12898, EO 14096, and DOT Order 5610.2C.

## 9 REFERENCES

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- Title 49 of the Code of Federal Regulations Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964.
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## ATTACHMENT C1

### **EJScreen Reports**



# EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

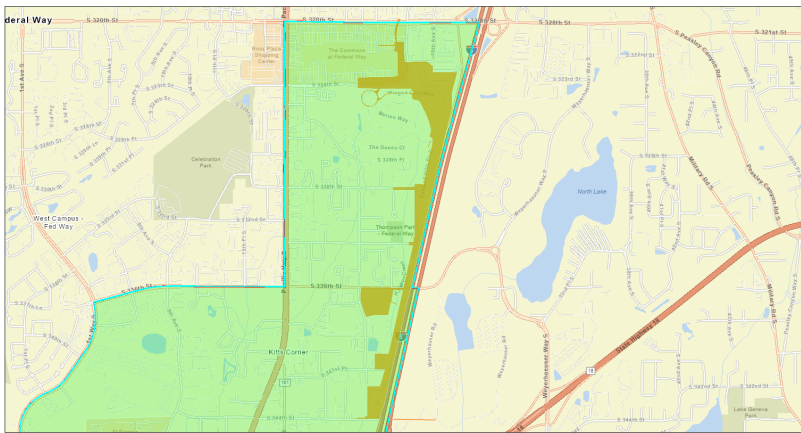
## Federal Way, WA

Blockgroup: 530330303131,530330303132,530330303133

Population: 5,342

Area in square miles: 1.57

A3 Landscape

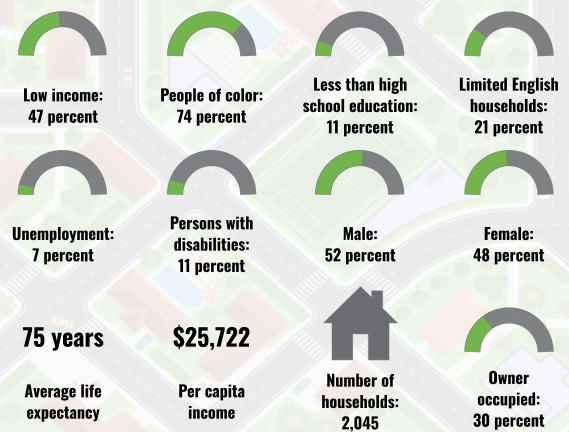


March 21, 2024  
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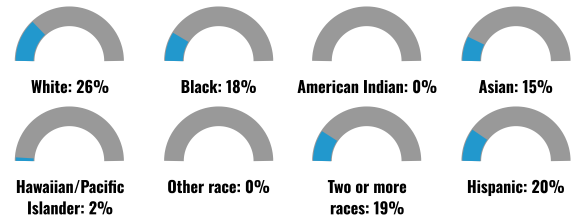
0 0.15 0.3 0.45 0.6 mi  
0 0.23 0.45 0.7 km

Real Community Maps Contributors: King County, WA  
State Parks GIS, Ben, Tachiro, Gerson, Salsburg  
GeoTechnology, Inc. METRIA, LLC, Bureau of  
Land Management, EPA, EPA, US Census Bureau,  
USDA, USFWS

### COMMUNITY INFORMATION



### BREAKDOWN BY RACE



### BREAKDOWN BY AGE



### LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

### LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	57%
Spanish	15%
Russian, Polish, or Other Slavic	5%
Other Indo-European	7%
Korean	3%
Vietnamese	5%
Other Asian and Pacific Island	2%
Other and Unspecified	4%
Total Non-English	43%



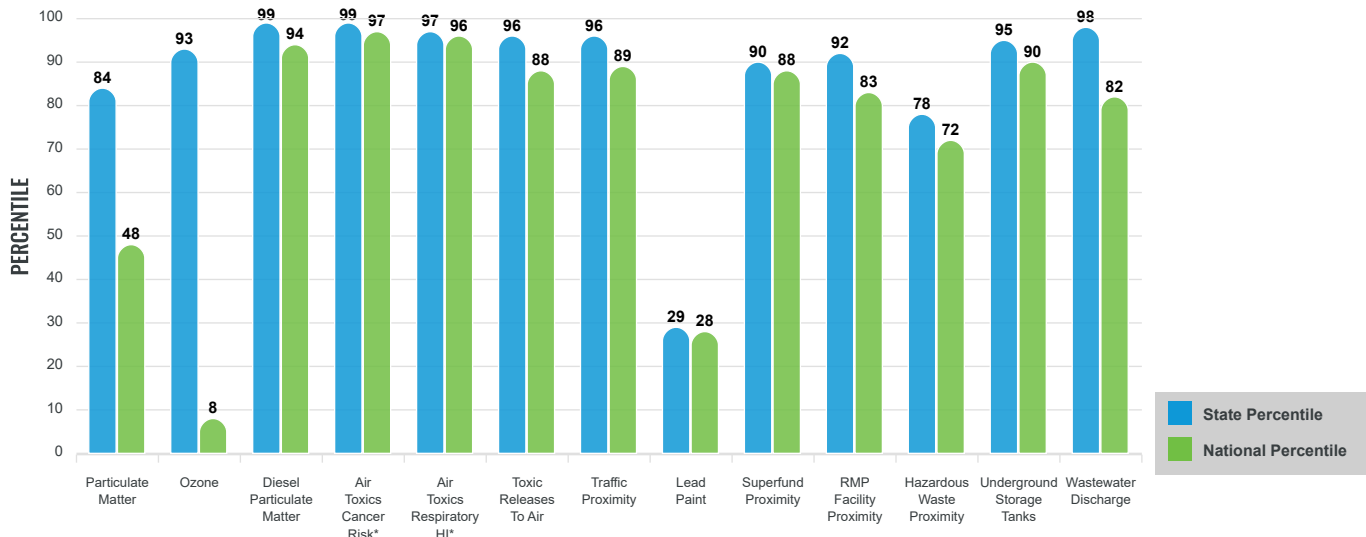
## Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

### EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

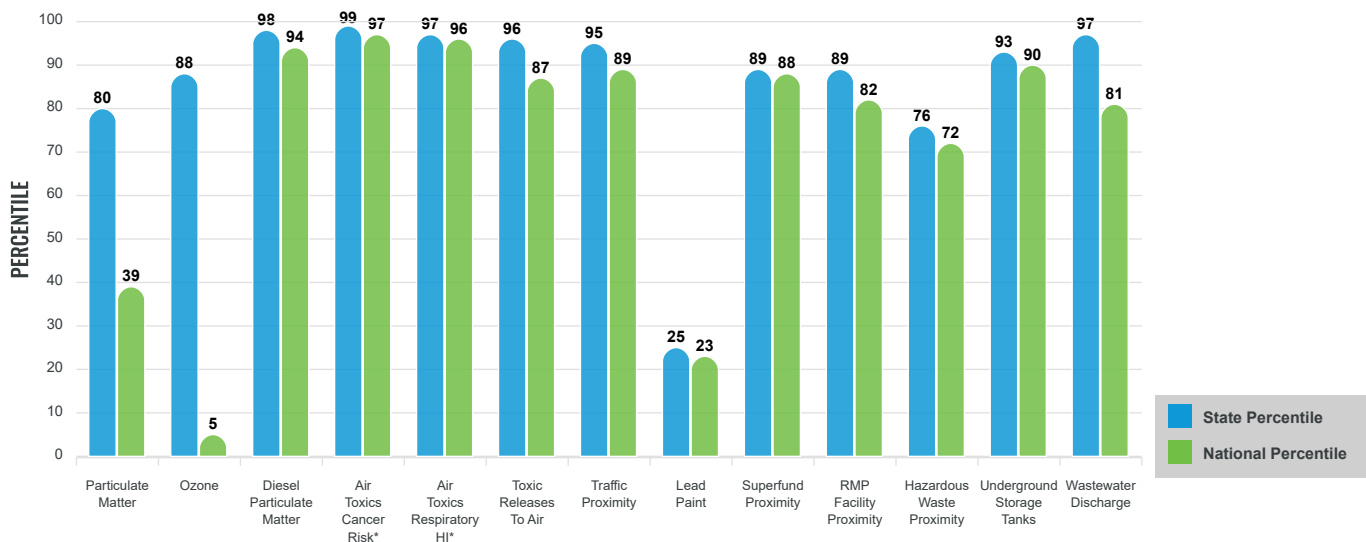
#### EJ INDEXES FOR THE SELECTED LOCATION



### SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

#### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for Blockgroup: 530330303131,530330303132,530330303133

# EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
<b>POLLUTION AND SOURCES</b>					
Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	6.92	7.02	44	8.08	19
Ozone (ppb)	50.6	49.8	59	61.6	2
Diesel Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	0.673	0.355	93	0.261	96
Air Toxics Cancer Risk* (lifetime risk per million)	40	27	94	25	94
Air Toxics Respiratory HI*	0.5	0.39	74	0.31	92
Toxic Releases to Air	1,500	1,800	71	4,600	67
Traffic Proximity (daily traffic count/distance to road)	290	190	84	210	82
Lead Paint (% Pre-1960 Housing)	0.01	0.23	15	0.3	16
Superfund Proximity (site count/km distance)	0.12	0.18	59	0.13	72
RMP Facility Proximity (facility count/km distance)	0.25	0.4	63	0.43	63
Hazardous Waste Proximity (facility count/km distance)	0.36	1.6	40	1.9	45
Underground Storage Tanks (count/km <sup>2</sup> )	9.3	6.3	79	3.9	87
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0025	0.024	91	22	56
<b>SOCIOECONOMIC INDICATORS</b>					
Demographic Index	60%	28%	95	35%	83
Supplemental Demographic Index	22%	12%	92	14%	82
People of Color	74%	32%	95	39%	80
Low Income	47%	24%	88	31%	77
Unemployment Rate	7%	5%	73	6%	70
Limited English Speaking Households	21%	4%	96	5%	93
Less Than High School Education	11%	8%	75	12%	62
Under Age 5	10%	6%	84	6%	83
Over Age 64	13%	16%	40	17%	37
Low Life Expectancy	23%	18%	94	20%	83

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

## Sites reporting to EPA within defined area:

Superfund .....	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	0
Water Dischargers .....	21
Air Pollution .....	1
Brownfields .....	0
Toxic Release Inventory .....	0

## Other community features within defined area:

Schools .....	2
Hospitals .....	1
Places of Worship .....	4

## Other environmental data:

Air Non-attainment .....	No
Impaired Waters .....	Yes

Selected location contains American Indian Reservation Lands* .....	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community .....	Yes
Selected location contains an EPA IRA disadvantaged community .....	Yes

Report for Blockgroup: 530330303131,530330303132,530330303133

## EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	23%	18%	94	20%	83
Heart Disease	6.5	5.3	78	6.1	60
Asthma	10.5	10.5	47	10	69
Cancer	7.2	6.3	74	6.1	74
Persons with Disabilities	10.3%	13.1%	34	13.4%	34

CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	10%	11%	69	12%	67
Wildfire Risk	0%	12%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	11%	9%	68	14%	49
Lack of Health Insurance	11%	6%	87	9%	72
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Report for Blockgroup: 530330303131,530330303132,530330303133



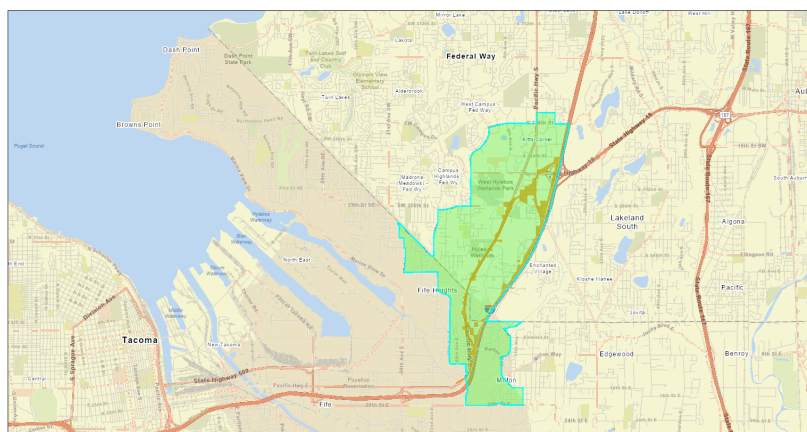
# EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

## Pierce County, WA

Blockgroup: 530330303133,530330303043,530330303042,530539400021,530530707031  
Population: 8,966  
Area in square miles: 5.05

A3 Landscape

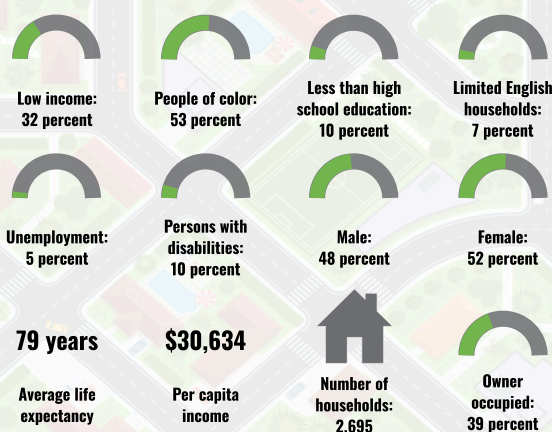


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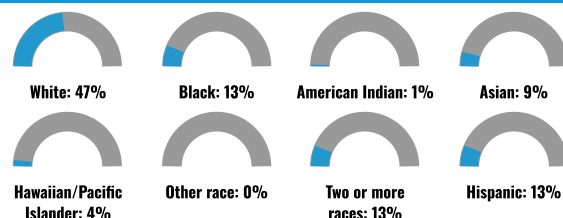
0 0.5 1 2 mi  
0 0.5 1 2 km

City of Tacoma, King County, WA State Parks GIS, East  
Tacoma, Olympia, Shelton, Oyster Technologies, Inc.  
NITRAD, AGS, Bureau of Land Management, EPA,  
HHS, USDA, USFWS

### COMMUNITY INFORMATION



### BREAKDOWN BY RACE



### BREAKDOWN BY AGE



### LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

### LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	71%
Spanish	9%
Russian, Polish, or Other Slavic	4%
Other Indo-European	3%
Korean	3%
Vietnamese	2%
Tagalog (including Filipino)	2%
Other Asian and Pacific Island	4%
Other and Unspecified	2%
Total Non-English	29%

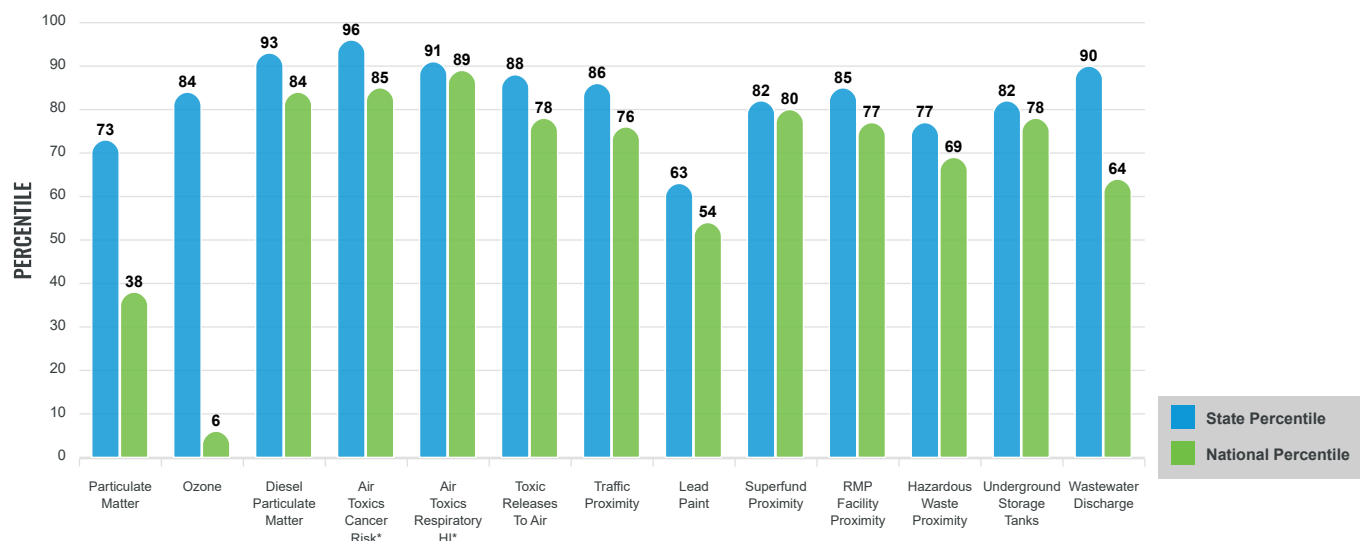
## Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

### EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

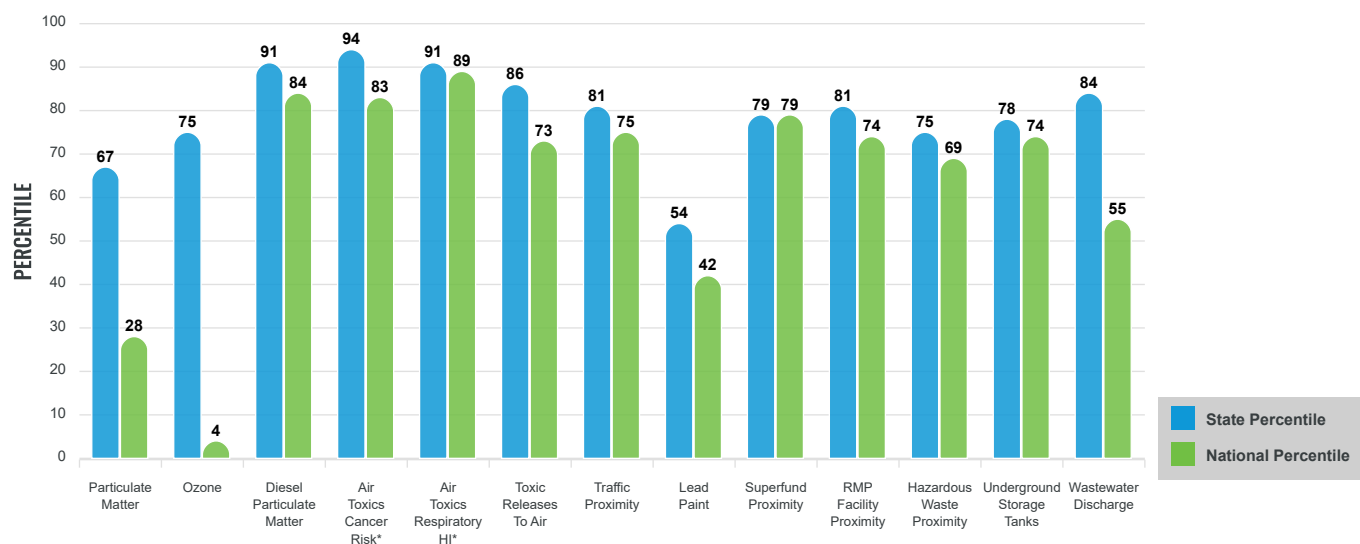
#### EJ INDEXES FOR THE SELECTED LOCATION



### SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

#### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for Blockgroup: 530330303133,530330303043,530330303042,530539400021,530530707031

# EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
<b>POLLUTION AND SOURCES</b>					
Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	6.97	7.02	47	8.08	19
Ozone (ppb)	50.8	49.8	61	61.6	2
Diesel Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	0.607	0.355	91	0.261	94
Air Toxics Cancer Risk* (lifetime risk per million)	33	27	37	25	52
Air Toxics Respiratory HI*	0.5	0.39	74	0.31	92
Toxic Releases to Air	1,400	1,800	68	4,600	65
Traffic Proximity (daily traffic count/distance to road)	220	190	77	210	77
Lead Paint (% Pre-1960 Housing)	0.13	0.23	49	0.3	39
Superfund Proximity (site count/km distance)	0.14	0.18	65	0.13	78
RMP Facility Proximity (facility count/km distance)	0.63	0.4	83	0.43	80
Hazardous Waste Proximity (facility count/km distance)	1.7	1.6	72	1.9	70
Underground Storage Tanks (count/km <sup>2</sup> )	5.1	6.3	68	3.9	77
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.0011	0.024	87	22	49
<b>SOCIOECONOMIC INDICATORS</b>					
Demographic Index	42%	28%	82	35%	67
Supplemental Demographic Index	15%	12%	74	14%	59
People of Color	53%	32%	82	39%	68
Low Income	32%	24%	71	31%	58
Unemployment Rate	5%	5%	58	6%	57
Limited English Speaking Households	7%	4%	81	5%	79
Less Than High School Education	10%	8%	71	12%	58
Under Age 5	7%	6%	72	6%	72
Over Age 64	10%	16%	29	17%	27
Low Life Expectancy	20%	18%	67	20%	51

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

## Sites reporting to EPA within defined area:

Superfund .....	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	0
Water Dischargers .....	50
Air Pollution .....	2
Brownfields .....	1
Toxic Release Inventory .....	2

## Other community features within defined area:

Schools .....	4
Hospitals .....	1
Places of Worship .....	5

## Other environmental data:

Air Non-attainment .....	Yes
Impaired Waters .....	Yes

Selected location contains American Indian Reservation Lands* .....	Yes
Selected location contains a "Justice40 (CEJST)" disadvantaged community .....	Yes
Selected location contains an EPA IRA disadvantaged community .....	Yes

Report for Blockgroup: 530330303133,530330303043,530330303042,530539400021,530530707031



## EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	20%	18%	67	20%	51
Heart Disease	5.4	5.3	53	6.1	37
Asthma	10.4	10.5	43	10	66
Cancer	6.1	6.3	43	6.1	45
Persons with Disabilities	9.9%	13.1%	32	13.4%	32

CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	8%	11%	63	12%	59
Wildfire Risk	0%	12%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	9%	9%	62	14%	43
Lack of Health Insurance	7%	6%	69	9%	54
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	No	N/A	N/A	N/A	N/A

Report for Blockgroup: 530330303133,530330303043,530330303042,530539400021,530530707031



# EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

## Tacoma, WA

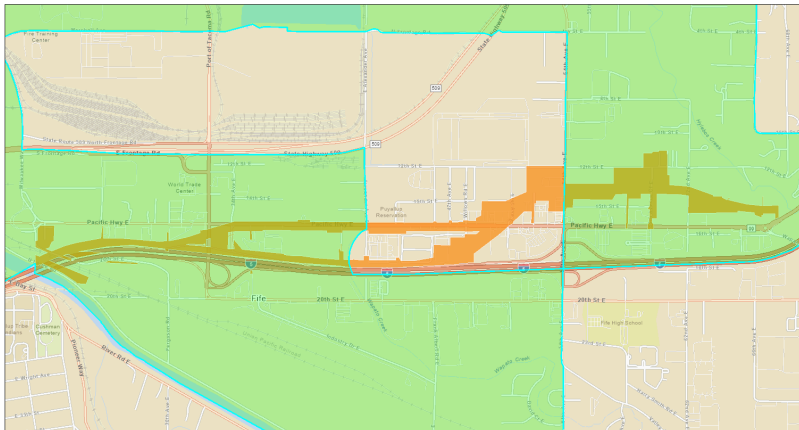
Blockgroup:

530539400024,530539400023,530539400022,530530602001

Population: 4,857

Area in square miles: 14.23

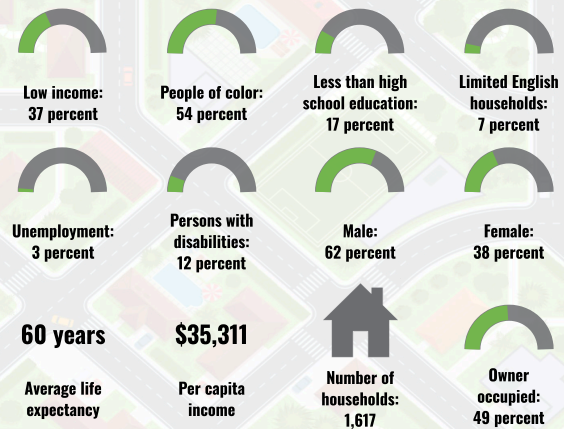
A3 Landscape



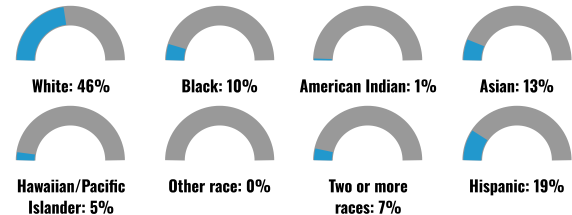
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1:18,056  
0 0.15 0.3 0.45 0.6 mi  
0 0.23 0.45 0.9 km  
EPA Community Maps Contributors: City of Tacoma, King County, WA State Parks (GIS), Evergreen, Green, Seattle, Snohomish, WA, METRO, WSDOT, Bureau of Land Management, EPA, EPA, US Census Bureau, USDA, USFWS

### COMMUNITY INFORMATION



### BREAKDOWN BY RACE



### BREAKDOWN BY AGE



### LIMITED ENGLISH SPEAKING BREAKDOWN



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

### LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	66%
Spanish	15%
French, Haitian, or Cajun	1%
Russian, Polish, or Other Slavic	3%
Other Indo-European	2%
Korean	3%
Chinese (including Mandarin, Cantonese)	1%
Tagalog (including Filipino)	3%
Other Asian and Pacific Island	4%
Other and Unspecified	1%
Total Non-English	34%

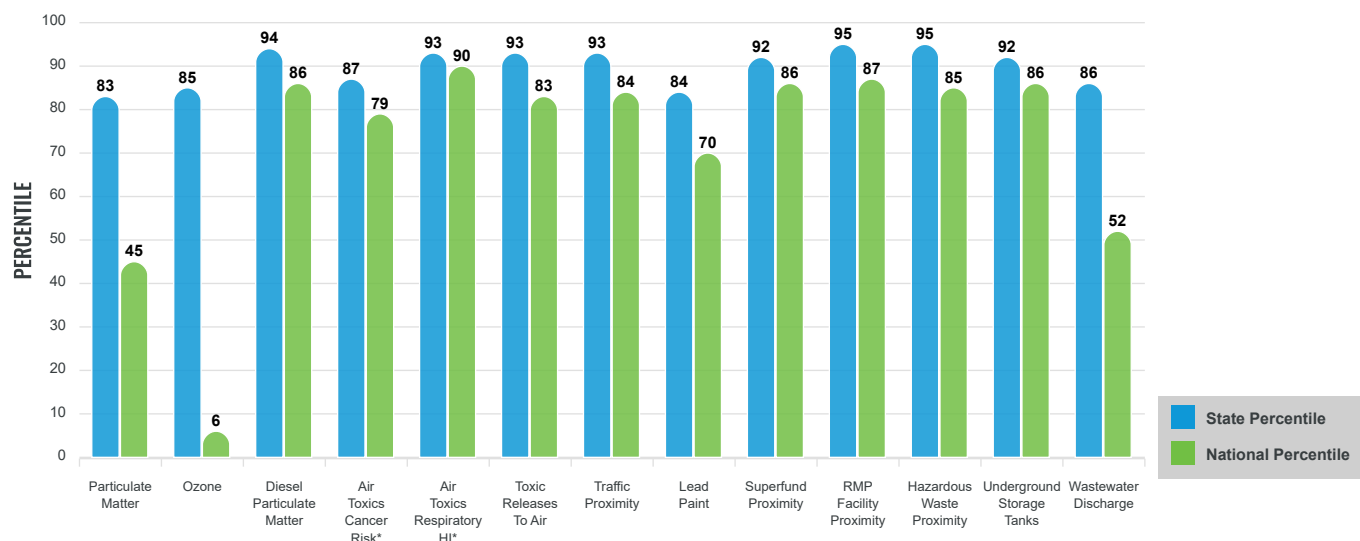
## Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

### EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

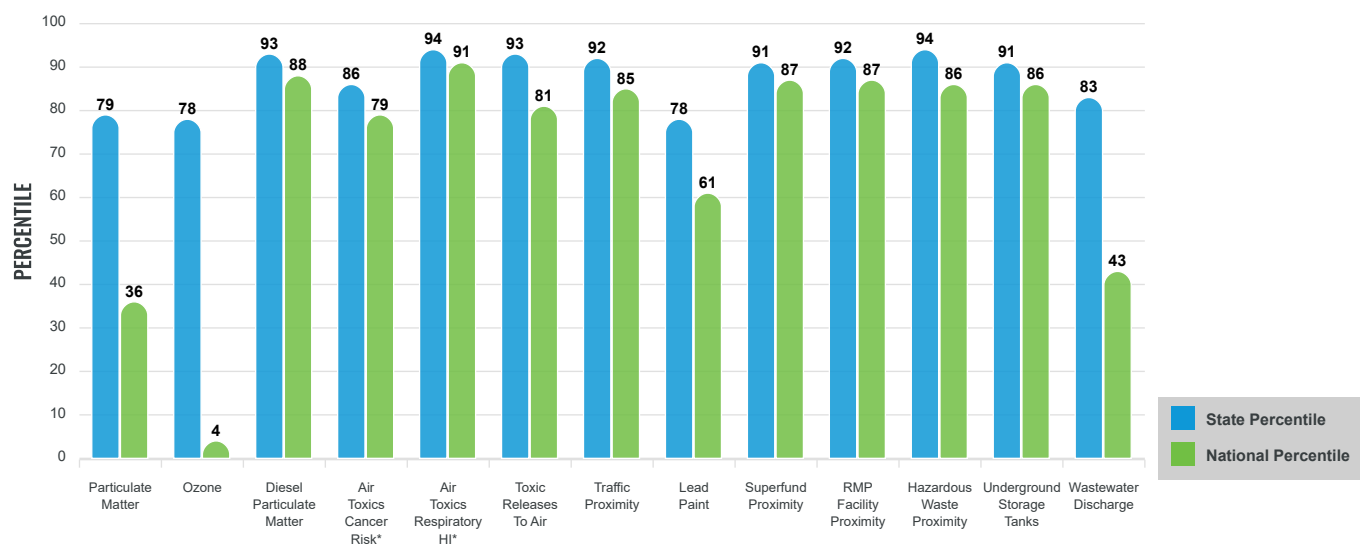
#### EJ INDEXES FOR THE SELECTED LOCATION



### SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

#### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for Blockgroup: 530539400024,530539400023,530539400022,530530602001

# EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
<b>POLLUTION AND SOURCES</b>					
Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	7.11	7.02	55	8.08	22
Ozone (ppb)	50.5	49.8	59	61.6	2
Diesel Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	0.575	0.355	89	0.261	94
Air Toxics Cancer Risk* (lifetime risk per million)	30	27	37	25	52
Air Toxics Respiratory HI*	0.5	0.39	74	0.31	92
Toxic Releases to Air	2,200	1,800	81	4,600	74
Traffic Proximity (daily traffic count/distance to road)	480	190	91	210	90
Lead Paint (% Pre-1960 Housing)	0.21	0.23	60	0.3	49
Superfund Proximity (site count/km distance)	0.37	0.18	88	0.13	92
RMP Facility Proximity (facility count/km distance)	1.9	0.4	96	0.43	96
Hazardous Waste Proximity (facility count/km distance)	6.6	1.6	95	1.9	92
Underground Storage Tanks (count/km <sup>2</sup> )	15	6.3	87	3.9	93
Wastewater Discharge (toxicity-weighted concentration/m distance)	8.4E-05	0.024	68	22	29
<b>SOCIOECONOMIC INDICATORS</b>					
Demographic Index	46%	28%	86	35%	70
Supplemental Demographic Index	17%	12%	81	14%	68
People of Color	54%	32%	83	39%	69
Low Income	37%	24%	78	31%	66
Unemployment Rate	3%	5%	45	6%	45
Limited English Speaking Households	7%	4%	82	5%	80
Less Than High School Education	17%	8%	87	12%	76
Under Age 5	3%	6%	30	6%	33
Over Age 64	12%	16%	38	17%	35
Low Life Expectancy	11%	18%	2	20%	1

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

## Sites reporting to EPA within defined area:

Superfund .....	1
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	13
Water Dischargers .....	293
Air Pollution .....	44
Brownfields .....	6
Toxic Release Inventory .....	44

## Other community features within defined area:

Schools .....	1
Hospitals .....	0
Places of Worship .....	1

## Other environmental data:

Air Non-attainment .....	Yes
Impaired Waters .....	Yes

Selected location contains American Indian Reservation Lands* .....	Yes
Selected location contains a "Justice40 (CEJST)" disadvantaged community .....	Yes
Selected location contains an EPA IRA disadvantaged community .....	Yes

Report for Blockgroup: 530539400024,530539400023,530539400022,530530602001

## EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	11%	18%	2	20%	1
Heart Disease	4.9	5.3	39	6.1	26
Asthma	10.5	10.5	47	10	69
Cancer	4.7	6.3	14	6.1	21
Persons with Disabilities	12%	13.1%	46	13.4%	46

CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	35%	11%	93	12%	93
Wildfire Risk	0%	12%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	8%	9%	57	14%	38
Lack of Health Insurance	8%	6%	75	9%	60
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Report for Blockgroup: 530539400024,530539400023,530539400022,530530602001



# Tacoma, WA

**Population: 3,747**

### A3 Landscape



Eri Community Maps Contributors, City of Tacoma, Ki County, WA State Parks GIS, © OpenStreetMap Microsoft, Eri, TomTom, Garmin, SafeGis GeoTechnologies, Inc. METRASA, USGS, Bureau Land Management, EPA, NPS, US Census Bureau

Statistic	Value
Low income:	41 percent
People of color:	57 percent
Less than high school education:	17 percent
Limited English households:	8 percent
Unemployment:	3 percent
Persons with disabilities:	13 percent
Male:	66 percent
Female:	34 percent
Average life expectancy	38 years
Per capita income	\$39,887
Number of households:	1,223
Owner occupied:	49 percent

Race/Ethnicity	Percentage
White	43%
Black	8%
American Indian	3%
Asian	11%
Hawaiian/Pacific Islander	1%
Other race	0%
Two or more races	12%
Hispanic	21%

	From Ages 1 to 4	6%
	From Ages 1 to 18	15%
	From Ages 18 and up	85%
	From Ages 65 and up	9%

<div><div></div></div>	Speak Spanish	37%
<div><div></div></div>	Speak Other Indo-European Languages	45%
<div><div></div></div>	Speak Asian-Pacific Island Languages	18%
<div><div></div></div>	Speak Other Languages	0%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

LANGUAGE	PERCENT
English	64%
Spanish	19%
French, Haitian, or Cajun	1%
Russian, Polish, or Other Slavic	3%
Other Indo-European	2%
Chinese (including Mandarin, Cantonese)	2%
Tagalog (including Filipino)	1%
Other Asian and Pacific Island	4%
Other and Unspecified	3%
Total Non-English	36%



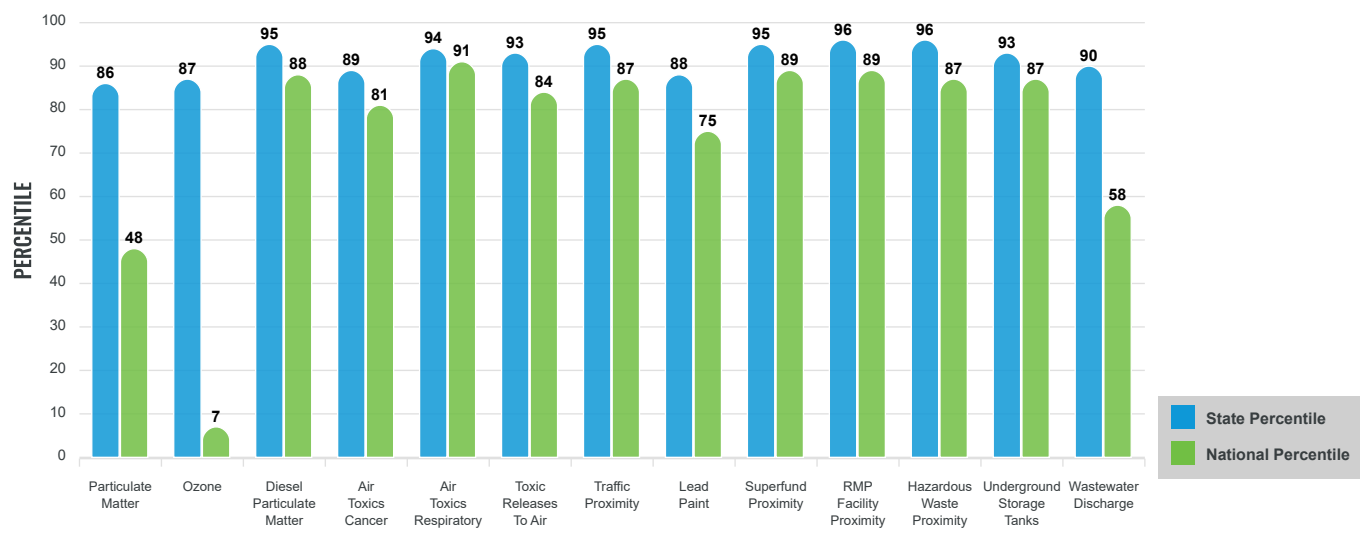
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The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

### EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

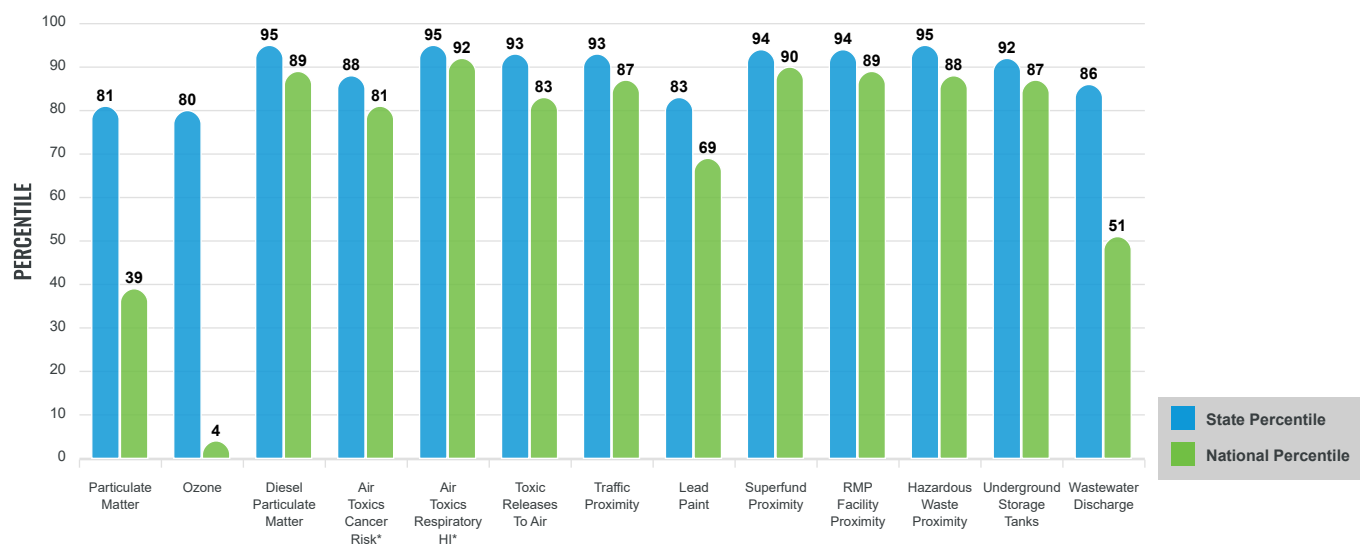
#### EJ INDEXES FOR THE SELECTED LOCATION



### SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

#### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for Blockgroup: 530530602001,530539400071

# EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
<b>POLLUTION AND SOURCES</b>					
Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	7.15	7.02	57	8.08	23
Ozone (ppb)	50.3	49.8	57	61.6	2
Diesel Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	0.576	0.355	89	0.261	94
Air Toxics Cancer Risk* (lifetime risk per million)	30	27	37	25	52
Air Toxics Respiratory HI*	0.5	0.39	74	0.31	92
Toxic Releases to Air	2,300	1,800	81	4,600	75
Traffic Proximity (daily traffic count/distance to road)	550	190	93	210	91
Lead Paint (% Pre-1960 Housing)	0.29	0.23	69	0.3	57
Superfund Proximity (site count/km distance)	0.52	0.18	92	0.13	95
RMP Facility Proximity (facility count/km distance)	2.2	0.4	97	0.43	97
Hazardous Waste Proximity (facility count/km distance)	6.6	1.6	95	1.9	92
Underground Storage Tanks (count/km <sup>2</sup> )	14	6.3	86	3.9	92
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.00013	0.024	71	22	32
<b>SOCIOECONOMIC INDICATORS</b>					
Demographic Index	49%	28%	88	35%	73
Supplemental Demographic Index	18%	12%	84	14%	71
People of Color	57%	32%	85	39%	70
Low Income	41%	24%	82	31%	70
Unemployment Rate	4%	5%	50	6%	49
Limited English Speaking Households	8%	4%	82	5%	81
Less Than High School Education	17%	8%	87	12%	76
Under Age 5	6%	6%	59	6%	60
Over Age 64	9%	16%	25	17%	24
Low Life Expectancy	11%	18%	1	20%	1

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

## Sites reporting to EPA within defined area:

Superfund .....	1
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	9
Water Dischargers .....	244
Air Pollution .....	42
Brownfields .....	6
Toxic Release Inventory .....	40

## Other community features within defined area:

Schools .....	2
Hospitals .....	0
Places of Worship .....	1

## Other environmental data:

Air Non-attainment .....	Yes
Impaired Waters .....	Yes

Selected location contains American Indian Reservation Lands* .....	Yes
Selected location contains a "Justice40 (CEJST)" disadvantaged community .....	Yes
Selected location contains an EPA IRA disadvantaged community .....	Yes

Report for Blockgroup: 530530602001,530539400071

## EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	11%	18%	1	20%	1
Heart Disease	4.9	5.3	36	6.1	24
Asthma	11.1	10.5	67	10	79
Cancer	3.9	6.3	4	6.1	10
Persons with Disabilities	12.7%	13.1%	51	13.4%	51

CLIMATE INDICATORS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	19%	11%	84	12%	84
Wildfire Risk	0%	12%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	6%	9%	50	14%	33
Lack of Health Insurance	9%	6%	76	9%	61
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Report for Blockgroup: 530530602001,530539400071



# ***Tacoma Dome Link Extension***

**Draft** Environmental Impact Statement

## DRAFT INDIVIDUAL SECTION 4(f) EVALUATION

### Appendix D

# Table of Contents

<b>1</b>	<b>EXECUTIVE SUMMARY .....</b>	<b>D-1</b>
<b>2</b>	<b>INTRODUCTION.....</b>	<b>D-2</b>
2.1	Proposed Action .....	D-3
2.2	Purpose of TDLE .....	D-7
2.3	Need for TDLE.....	D-7
2.4	Definition of Section 4(f) Use .....	D-8
2.5	Approval of Projects That Use Section 4(f) Property .....	D-9
2.6	Study Area .....	D-9
<b>3</b>	<b>SECTION 4(F) RESOURCES IN THE TDLE STUDY AREA .....</b>	<b>D-10</b>
3.1	Parks and Open Space Resources .....	D-10
3.2	Wildlife and Waterfowl Refuges .....	D-16
3.3	Historic and Archaeological Resources.....	D-16
3.4	Cemeteries .....	D-37
3.5	Traditional Cultural Properties.....	D-37
<b>4</b>	<b>POTENTIAL USE OF SECTION 4(F) RESOURCES .....</b>	<b>D-37</b>
<b>5</b>	<b>SECTION 4(F) AVOIDANCE ALTERNATIVES ANALYSIS .....</b>	<b>D-59</b>
5.1	No-Build Alternative .....	D-60
5.2	Alternative Actions .....	D-60
5.3	Locational Alternatives and Alignment Shifts.....	D-60
	South Federal Way Segment .....	D-61
	Fife Segment .....	D-64
5.4	Design Changes .....	D-64
<b>6</b>	<b>MEASURES TO MINIMIZE HARM .....</b>	<b>D-69</b>
<b>7</b>	<b>LEAST HARM ANALYSIS .....</b>	<b>D-72</b>
<b>8</b>	<b>COORDINATION WITH OFFICIALS WITH JURISDICTION OF SECTION 4(F) RESOURCES.....</b>	<b>D-73</b>
<b>9</b>	<b>REFERENCES.....</b>	<b>D-74</b>

## Figures

Figure D-1	TDLE Build Alternatives by Segment .....	D-6
Figure D-2	Section 4(f) Resources – Federal Way Segment .....	D-11
Figure D-3	Section 4(f) Resources – South Federal Way Segment .....	D-12
Figure D-4	Section 4(f) Resources – Fife Segment.....	D-13
Figure D-5	Section 4(f) Resources – Tacoma Segment.....	D-14
Figure D-6	Cedar Grove Park.....	D-15
Figure D-7	West Hylebos Osaka Property .....	D-16
Figure D-8	34726 16th Avenue S, view southeast .....	D-17
Figure D-9	34726 16th Avenue S, view northwest .....	D-17
Figure D-10	726 S 356th Street, view northwest.....	D-18
Figure D-11	726 S 356th Street, view southwest .....	D-18
Figure D-12	726 S 356th Street, view north .....	D-18
Figure D-13	726 S 356th Street, view northeast .....	D-18
Figure D-14	36605 Pacific Highway, Classrooms 1, 2, and 3, view south.....	D-19
Figure D-15	36605 Pacific Highway, Classrooms 1, 2, and 3, view north .....	D-19
Figure D-16	36605 Pacific Highway, Classrooms 4, view south.....	D-19
Figure D-17	36605 Pacific Highway, Classrooms 4, view west.....	D-19
Figure D-18	36605 Pacific Highway, Classrooms 5, view east.....	D-19
Figure D-19	36605 Pacific Highway, Classrooms 5, view southwest .....	D-19
Figure D-20	36605 Pacific Highway, Classrooms 6 and 7, view north .....	D-20
Figure D-21	36605 Pacific Highway, Classrooms 6 and 7, view southeast .....	D-20
Figure D-22	36605 Pacific Highway, Classrooms 6 and 7, Garage, view north.....	D-20
Figure D-23	36605 Pacific Highway, Classrooms 6 and 7, Wellhouse, view west.....	D-20
Figure D-24	36605 Pacific Highway, Classrooms 8 and 9, view east.....	D-20
Figure D-25	36605 Pacific Highway, Classrooms 8 and 9, view north .....	D-20
Figure D-26	36605 Pacific Highway, Residence, view west.....	D-21
Figure D-27	36605 Pacific Highway, Residence, view northeast .....	D-21
Figure D-28	36605 Pacific Highway, Residence, view southeast.....	D-21
Figure D-29	36605 Pacific Highway, natatorium, view east .....	D-21
Figure D-30	36605 Pacific Highway, Natatorium, view southwest.....	D-21
Figure D-31	36605 Pacific Highway, Conference Room, view north .....	D-21
Figure D-32	36605 Pacific Highway, Conference Room, view southeast.....	D-22
Figure D-33	36605 Pacific Highway, Conference Room Storage, view northeast, courtesy of the King County Assessor.....	D-22



Figure D-34	36530A Pacific Highway S, courtesy of the King County Assessor .....	D-22
Figure D-35	Aerial of 36530A Pacific Highway S, courtesy of the King County Assessor .....	D-22
Figure D-36	Undated photo of 36606 Pacific Highway S, courtesy of the King County Assessor .....	D-23
Figure D-37	36606 Pacific Highway S, courtesy of Redfin.com .....	D-23
Figure D-38	36606 Pacific Highway S, courtesy of Redfin.com .....	D-23
Figure D-39	36606 Pacific Highway S, courtesy of Redfin.com .....	D-23
Figure D-40	36903 Pacific Highway S, undated, courtesy of the King County Assessor .....	D-24
Figure D-41	36903 Pacific Highway S, undated, courtesy of the Redfin.com .....	D-24
Figure D-42	37600 Pacific Highway S, view southwest .....	D-25
Figure D-43	37600 Pacific Highway S, view south .....	D-25
Figure D-44	37600 Pacific Highway S, view northeast .....	D-25
Figure D-45	37600 Pacific Highway S, view southwest .....	D-25
Figure D-46	7909 Pacific Highway E, view northwest .....	D-26
Figure D-47	7909 Pacific Highway E, view northwest .....	D-26
Figure D-48	7909 Pacific Highway E, view west .....	D-26
Figure D-49	7700 Pacific Highway E, view southeast .....	D-27
Figure D-50	7700 Pacific Highway E, view south .....	D-27
Figure D-51	1309 62nd Avenue E, view east .....	D-28
Figure D-52	1309 62nd Avenue E, with Garage to the East, view southeast .....	D-28
Figure D-53	4306 Pacific Highway E, view southwest .....	D-28
Figure D-54	4306 Pacific Highway E, view southeast .....	D-28
Figure D-55	Puyallup River Bridge (Pacific Highway E crossing) .....	D-29
Figure D-56	E 21st Street Bridge (Lincoln Avenue crossing) .....	D-29
Figure D-57	Milwaukee Railroad – Puyallup River Bridge .....	D-29
Figure D-58	Puyallup River Levees, view north from the I-5 Bridge .....	D-30
Figure D-59	Puyallup River Levees, view south from the I-5 Bridge .....	D-30
Figure D-60	BNSF Rail from I-5, West Bank of the Puyallup River, view north .....	D-30
Figure D-61	BNSF Rail and Bridge from I-5, West bank of the Puyallup River, view south .....	D-30
Figure D-62	Engine House No. 4 .....	D-31
Figure D-63	Residence at 1320 E 26th Street, view south .....	D-31
Figure D-64	Residence at 1112 E 26th Street, view southwest .....	D-32
Figure D-65	Residence at 1112 E 26th Street, view southeast .....	D-32

Figure D-66	1112 E 26th Street, 1977, courtesy of Tacoma Public Library, view south.....	D-32
Figure D-67	Residence at 1106 E 26th Street, view southwest.....	D-33
Figure D-68	Residence at 1106 E 26th Street, view southeast .....	D-33
Figure D-69	1106 E 26th Street, 1977, courtesy of Tacoma Public Library, view south.....	D-33
Figure D-70	BNSF Freight Warehouse at 603–605 Puyallup Avenue, view northwest.....	D-34
Figure D-71	BNSF Freight Warehouse at 603–605 Puyallup Avenue, view northeast .....	D-34
Figure D-72	603–605 Puyallup Avenue, 1948, view northeast, courtesy of Tacoma Public Library .....	D-34
Figure D-73	603–605 Puyallup Avenue, 1948, view northeast, courtesy of Tacoma Public Library .....	D-34
Figure D-74	Commercial Building at 101 E 26th Street, Facade and East Elevation, view northwest .....	D-35
Figure D-75	Commercial Building at 101 E 26th Street, Facade and East Elevation, view northwest in an undated photograph, image courtesy of the Department of the Interior (2020) .....	D-35
Figure D-76	Commercial Building at 102 S 26th Street, Facade and West Elevation, view southeast .....	D-35
Figure D-77	Commercial Building at 102 S 26th Street, East Elevation, view west.....	D-35
Figure D-78	Almond Roca Factory at 110 E 26th Street, view southwest .....	D-36
Figure D-79	Original Brown and Haley Factory at 110 E 26th Street, 1948, courtesy of Tacoma Public Library .....	D-36
Figure D-80	Pavilion at 102 E 26th Street, view southwest.....	D-36
Figure D-81	Pavilion at 102 E 26th Street, view southeast .....	D-36
Figure D-82	Section 4(f) Use of School and Residence – SF 99-West Alternative.....	D-40
Figure D-83	Section 4(f) Use of Residence and Stables – SF 99-East Alternative.....	D-42
Figure D-84	Section 4(f) Use of Residence – SF 99-West Alternative .....	D-43
Figure D-85	Section 4(f) Use of West Hylebos Osaka Property– Porter Way Design Option with SF 99-West or SF 99-East Alternatives .....	D-45
Figure D-86	Section 4(f) Use of Daffodil Motel – SF 99-West Alternative .....	D-47
Figure D-87	Section 4(f) Use of Daffodil Motel – SF 99-East Alternative .....	D-48
Figure D-88	Section 4(f) Use of Residence at 1309 62nd Avenue E – All Alternatives .....	D-50
Figure D-89	Section 4(f) Use of Pick-Quick – Fife Pacific Highway Alternative .....	D-51
Figure D-90	Section 4(f) Use of Pick-Quick – Fife Median Alternative .....	D-52
Figure D-91	Section 4(f) <i>De Minimis</i> Impact to Cappa Park – Fife Pacific Highway Alternative.....	D-54
Figure D-92	Section 4(f) <i>De Minimis</i> Impact to Cappa Park – Fife Median Alternative.....	D-55
Figure D-93	Section 4(f) <i>De Minimis</i> Impact to Cappa Park – Fife I-5 Alternative .....	D-56

Figure D-94	Potential Avoidance Alternatives Considered – South Federal Way Segment .....	D-62
Figure D-95	Potential Avoidance Alternatives Considered – Fife Segment .....	D-65
Figure D-96	Potential Avoidance Tunnel Alternative .....	D-66

## Tables

Table D-1	Summary of Preliminary Section 4(f) Use Determinations by Alternative for the South Federal Way Segment .....	D-1
Table D-2	Summary of Preliminary Section 4(f) Use Determinations by Alternative for the Fife Segment .....	D-1
Table D-3	Summary of Preliminary Section 4(f) Use Determinations by Alternative for the Tacoma Segment .....	D-2
Table D-4	Summary of TDLE Build Alternatives and Station and Design Options Evaluated in Draft Environmental Impact Statement .....	D-3
Table D-5	Summary of Preliminary Section 4(f) Use Determinations by Alternative for the South Federal Way Segment .....	D-38
Table D-6	Summary of Preliminary Section 4(f) Use Determinations by Alternative for the Fife Segment .....	D-46
Table D-7	Summary of Preliminary Section 4(f) Use Determinations by Alternative for the Tacoma Segment .....	D-57
Table D-8	Potential Avoidance Alternatives Evaluation of Prudence Criterion for South Federal Way Segment .....	D-63
Table D-9	Potential Avoidance Alternatives Evaluation of Prudence Criterion for Fife Segment (Residence at 1309 62nd Avenue E) .....	D-67
Table D-10	Proposed Measures to Minimize Harm to Section 4(f) Resources .....	D-70

## Attachments

D.1	Section 4(f) Status of Parks and Recreational Resources in the Study Area
D.2	Correspondence

## Acronyms and Abbreviations

APE	Area of Potential Effects
CFR	Code of Federal Regulations
DOT	United States Department of Transportation
EIS	Environmental Impact Statement
FHWA	Federal Highway Administration
Fife Median	Fife Pacific Highway Median
FTA	Federal Transit Administration
GHG	greenhouse gas
I-5	Interstate 5
NRHP	National Register of Historic Places
PSRC	Puget Sound Regional Council
Puyallup Tribe of the Puyallup Reservation	Puyallup Tribe of Indians
Section 4(f)	Section 4(f) of the Department of Transportation Act of 1966
SF	South Federal Way
SHPO	State Historic Preservation Officer
Sound Transit	Central Puget Sound Regional Transit Authority
SR	State Route
TCP	traditional cultural properties
TDLE	Tacoma Dome Link Extension
THPO	Tribal Historic Preservation Office
VMТ	vehicle miles traveled
WHR	Washington Heritage Register
WSDOT	Washington State Department of Transportation

# 1 EXECUTIVE SUMMARY

Up to eight resources that qualify for protection under Section 4(f) of the Department of Transportation Act [Section 4(f)] could be used by the Tacoma Dome Link Extension (TDLE), depending on the alternative. In the South Federal Way Segment, up to four historic resources (a school, stables, a residence, and signage associated with a motel) could be used by alternatives on the State Route (SR) 99 corridor, and one historic resource and one archaeological resource could be used by the alternatives along the Interstate 5 (I-5) corridor. In the Fife Segment, at least one historic resource, a single-family residence, would be removed under any of the alternatives. One alternative would require the removal of a second historic property, the Pick-Quick Drive In, in the City of Fife. No Section 4(f) resources would be used in the Federal Way or Tacoma segments. Consultation with officials with jurisdiction is ongoing regarding the applicability of Section 4(f) and the potential use of Section 4(f) resources. A summary of preliminary Section 4(f) use determinations, by alternative, are included in Tables D-1 through Table D-3.

**Table D-1 Summary of Preliminary Section 4(f) Use Determinations by Alternative for the South Federal Way Segment**

Resource	SF Enchanted Parkway	SF I-5	SF 99-West <sup>1</sup>	SF 99-East <sup>1</sup>
Denny's Restaurant at 34726 16th Avenue S	No use	No use	<i>De minimis</i>	<i>De minimis</i>
Montessori Academy at Spring Valley, 36605 Pacific Highway S, Federal Way	No use	No use	Use	No use
K.C.J. Stables and Residence, 36530A Pacific Highway S, Federal Way	No use	No use	Use	Use
Residence at 36606 Pacific Highway S, Federal Way	No use	No use	No use	Use
Residence at 36903 Pacific Highway S, Federal Way	No use	No use	Use	<i>De minimis</i>
Site 45K11586	Use	Use	No use	No use
West Hylebos Osaka Property	No use	No use	<i>De minimis</i> only with Porter Way Design Option	<i>De minimis</i> only with Porter Way Design Option
Daffodil Motel, 7909 Pacific Highway E, Milton	No use	No use	Use	No use

Notes:

- (1) Preliminary Section 4(f) use determinations apply with or without the Porter Way Design Option unless otherwise noted.

**Table D-2 Summary of Preliminary Section 4(f) Use Determinations by Alternative for the Fife Segment<sup>1</sup>**

Resource	Fife Pacific Highway	Fife Median	Fife I-5
Residence at 1309 62nd Avenue E	Use	Use	Use
Pick-Quick Drive In, 4306 Pacific Highway	Use	<i>De minimis</i>	No use
Cappa Park (planned)	<i>De minimis</i>	<i>De minimis</i>	<i>De minimis</i>

Note:

- (1) Preliminary Section 4(f) use determinations apply with or without the 54th Street Design Option or 54th Span Design Option.

**Table D-3      Summary of Preliminary Section 4(f) Use Determinations by Alternative for the Tacoma Segment<sup>1</sup>**

Resource	Tacoma 25th Street-West	Tacoma 25th Street-East	Tacoma Close to Sounder	Tacoma 26th Street
Puyallup River Levees	<i>De minimis</i>	<i>De minimis</i>	<i>De minimis</i>	<i>De minimis</i>

Note:

(1) Preliminary Section 4(f) use determinations apply with or without the Portland Avenue Design Option.

## 2 INTRODUCTION

This appendix provides the documentation necessary to support determinations required to comply with the provisions of Section 4(f) of the Department of Transportation Act of 1966, as amended (codified in 49 United States Code 303, implemented by 23 Code of Federal Regulations [CFR] Part 774, and generally referred to as “Section 4(f)”), which protects publicly owned and publicly accessible parks, recreation areas, and wildlife and waterfowl refuges as well as historic and cultural resources. This Section 4(f) evaluation is also in accordance with the Federal Highway Administration (FHWA) Technical Advisory T6640.8A (FHWA 1987) and the revised FHWA Section 4(f) Policy Paper (FHWA 2012), which are the basis for Federal Transit Administration (FTA) guidance on Section 4(f).

Section 4(f) generally prohibits U.S. Department of Transportation (DOT) agencies, including the FTA, from approving projects that would use land from:

...a significant publicly owned park, recreation area or wildlife and waterfowl refuge or any significant historic site, unless there is no feasible and prudent alternative to the use of land from the property and the action includes all possible planning to minimize harm to the property resulting from the use.

A use is generally defined as a transportation activity that permanently or temporarily acquires land from a Section 4(f) property or that substantially impairs the important activities, features, or attributes that qualify the property as a Section 4(f) resource (23 CFR 774.17).

Section 4(f) applies to publicly owned parks and recreation areas that are open to the public; publicly owned wildlife and waterfowl refuges; and historic sites of national, state, or local significance. The DOT regulations for Section 4(f) define historic properties as those listed in or eligible for the National Register of Historic Places (NRHP). Protected activities, features, or attributes can be typical park and recreation activities, such as walking, hiking, or camping, or more organized sports like soccer, softball, or tennis. Parks can also be fairly passive in nature. Refuges include publicly owned land, including waters, where the major purpose of such land is the conservation, restoration, or management of endangered species, their habitat, and other wildlife and waterfowl resources and their habitat (23 CFR 774.11).

This appendix includes the following:

- A description of the proposed action and the purpose and need for the project.
- A description of Section 4(f) and the process for evaluating the use of a Section 4(f) resource.
- The identification of potential Section 4(f) resources within the TDLE study area.
- An evaluation of the potential for TDLE to result in a use of Section 4(f) resource, including permanent incorporation, temporary occupancy, or constructive use.



- Consideration whether identified uses of Section 4(f) properties may be determined to be a *de minimis* impact.
- An evaluation of whether there are any feasible and prudent alternatives that would avoid the use of Section 4(f) properties.
- The identification of potential measures to minimize harm resulting from unavoidable adverse impacts on Section 4(f) resources.
- A description of the coordination with officials with jurisdiction over Section 4(f) resources.

## 2.1 Proposed Action

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to build and operate the TDLE, which would expand the regional light rail system approximately 10 miles south from Federal Way in King County to Tacoma in Pierce County. The location of the project is unique within the Puget Sound Region due to its proximity to Sea-Tac International Airport to the north and Joint-Base Lewis-McChord to the south. The TDLE corridor would cross the ancestral and reservation lands of the Puyallup Tribe of the Puyallup Reservation (Puyallup Tribe of Indians), four cities, and parts of two counties and pass just south of the Port of Tacoma.

The project includes:

- Approximately 10 miles of dedicated guideway. Most of the guideway would be elevated and there would be no at-grade vehicle or pedestrian crossings. The guideway extends through unincorporated Pierce County, the cities of Federal Way, Milton, Fife, and Tacoma, and reservation lands of the Puyallup Tribe of Indians.
- A total of four stations, including one in South Federal Way, one in Fife, and two in Tacoma (one near Portland Avenue and one near the Tacoma Dome area).
- A rail-only fixed-span bridge crossing the Puyallup River.
- Parking facilities with approximately 500 stalls each at the South Federal Way and Fife stations in either surface or garage park-and-ride configurations.

The TDLE build alternatives are evaluated in four segments: Federal Way, South Federal Way, Fife, and Tacoma and are shown on Table D-4 and on Figure D-1.

**Table D-4 Summary of TDLE Build Alternatives and Station and Design Options Evaluated in Draft Environmental Impact Statement**

Alternative	Station Name	Station Location
<b>Federal Way Segment</b>		
FW Preferred Enchanted Parkway	Not applicable	Not applicable
<i>FW Preferred Enchanted Parkway with FW Design Option<sup>1</sup></i>	<i>Not applicable</i>	<i>Not applicable</i>

**Table D-4 Summary of TDLE Build Alternatives and Station and Design Options Evaluated in Draft Environmental Impact Statement (continued)**

Alternative	Station Name	Station Location
<b>South Federal Way Segment<sup>2, 3</sup></b>		
SF Enchanted Parkway	SF Enchanted Parkway Station	Enchanted Parkway S and S 352nd Street
	<i>SF 352nd Span Station Option</i>	<i>Enchanted Parkway S spanning S 352nd Street</i>
SF I-5	SF I-5 Station	I-5 and S 356th Street
SF 99-West <sup>4</sup>	SF 99-Enchanted Station	Enchanted Parkway S and S 352nd Street
<i>SF 99-West<sup>4</sup> with Porter Way Design Option</i>	<i>SF 99-Enchanted Station</i>	<i>Enchanted Parkway S and S 352nd Street</i>
SF 99-East <sup>4</sup>	SF 99-352nd Station	Between S 352nd Street and S 356th Street east of SR 99
SF 99-East <sup>4</sup> with Porter Way Design Option	<i>SF 99-352nd Station</i>	<i>Between S 352nd Street and S 356th Street east of SR 99</i>
<b>Fife Segment<sup>2</sup></b>		
Fife Pacific Highway	Preferred Fife Station	59th Avenue E between 15th Street E and 12th Street E
	<i>Fife 54th Avenue Station Option</i>	<i>West of 54th Avenue E between Pacific Highway and 12th Street E</i>
	<i>Fife 54th Span Station Option</i>	<i>Spanning 54th Avenue between Pacific Highway and 12th Street E</i>
Fife Pacific Highway Median (Fife Median)	Preferred Fife Station	59th Avenue E between 15th Street E and 12th Street E
	<i>Fife 54th Avenue Station Option</i>	<i>Design option for guideway alignment would be slightly further south between 54th and 51st Avenue E, with the station option west of 54th Avenue E between Pacific Highway and 12th Street E</i>
	<i>Fife 54th Span Station Option</i>	<i>Design option for guideway alignment would be slightly further south between 59th and 51st Avenue E, with the station option spanning 54th Avenue between Pacific Highway and 12th Street E</i>
Fife I-5	Preferred Fife Station	59th Avenue E between 15th Street E and 12th Street E
	<i>Fife 54th Avenue Station Option</i>	<i>Design option for guideway alignment would be slightly further south between 54th and 52nd Avenue E, with the station option west of 54th Avenue E between Pacific Highway and 12th Street E</i>
	<i>Fife 54th Span Station Option</i>	<i>Design option for guideway alignment would be slightly further south between 59th and 52nd Avenue E, with the station option spanning 54th Avenue between Pacific Highway and 12th Street E</i>

**Table D-4 Summary of TDLE Build Alternatives and Station and Design Options Evaluated in Draft Environmental Impact Statement (continued)**

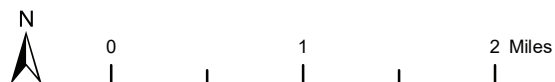
Alternative	Station Name	Station Location
<b>Tacoma Segment</b>		
Preferred Tacoma 25th Street-West	Preferred Portland Avenue Station	E 26th Street and E Portland Avenue
	<i>Portland Avenue Span Station Option</i>	<i>Spanning E Portland Avenue north of E 26th Street</i>
	Preferred Tacoma 25th Street-West Station	Above E 25th Street between East G Street and East D Street
Tacoma 25th Street-East	Preferred Portland Avenue Station	E 26th Street and E Portland Avenue
	<i>Portland Avenue Span Station Option</i>	<i>Spanning E Portland Avenue north of E 26th Street</i>
	Tacoma 25th Street-East Station	Above E 25th Street between McKinley Avenue E and East G Street
Tacoma Close to Sounder	Preferred Portland Avenue Station	E 26th Street and E Portland Avenue
	<i>Portland Avenue Span Station Option</i>	<i>Spanning E Portland Avenue north of E 26th Street</i>
	Tacoma Close to Sounder Station	Adjacent to Sounder right-of-way at East G Street and E 25th Street
Tacoma 26th Street	Preferred Portland Avenue Station	E 26th Street and E Portland Avenue
	<i>Portland Avenue Span Station Option</i>	<i>Spanning E Portland Avenue north of E 26th Street</i>
	Tacoma 26th Street Station	Above E 26th Street at East D Street

## Notes:

- (1) Design and station options are shaded and shown in *italics*.
- (2) Parking at the stations in South Federal Way and Fife may be deferred until 2038. Depending on funding availability, however, some amount up to 500 spaces may be provided between 2035 and 2038.
- (3) SF is used as the abbreviation for South Federal Way in the alternative and station naming.
- (4) The SF 99-Enchanted and SF 99-352nd station locations could be paired with either of the SF 99 alternatives.



### Tacoma Dome Link Extension



## 2.2 Purpose of TDLE

The purpose of TDLE is to expand the Link light rail system from the Federal Way Downtown Station to the Tacoma Dome Station area to:

- Provide high-quality rapid, reliable, and efficient light rail transit service to communities in the project corridor, as defined through the local planning process and reflected in the Sound Transit 3 Plan (Sound Transit 2016).
- Improve regional mobility by increasing connectivity and capacity in the TDLE corridor from the Federal Way Downtown Station to the Tacoma Dome Station area to meet projected transit demand.
- Connect the lands of the Puyallup Tribe of Indians and the cities of Federal Way, Milton, Fife, and Tacoma to regional centers and destinations on the regional high-capacity transit system as described in adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan (Sound Transit 2014).
- Implement a system that is technically and financially feasible to build, operate, and maintain.
- Expand mobility for the corridor and region's residents, which include transit-dependent, low-income, and minority populations.
- Encourage equitable and sustainable urban growth in station areas through support of transit oriented development and multimodal integration in a manner that is consistent with local land use plans and policies, including Sound Transit's Equitable Transit Oriented Development Policy and Sustainability policies (Sound Transit 2018 and 2019).
- Encourage convenient and safe nonmotorized access to stations, such as bicycle and pedestrian connections, consistent with Sound Transit's System Access Policy (Sound Transit 2013).
- Preserve and promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments.

## 2.3 Need for TDLE

The project is needed because:

- Chronic roadway congestion on I-5 and SR 99 — two primary north-south highways connecting communities along the corridor — delays today's travelers, including those using transit, and degrades the reliability of bus service traversing the corridor, particularly during commute periods.
- These chronic, degraded traffic conditions are expected to continue to worsen as the region's population and employment grow.
- PSRC, the regional metropolitan planning organization, and local plans call for high-capacity transit in the corridor consistent with VISION 2050 (PSRC 2020) and Sound Transit's Regional Transit Long-Range Plan (Sound Transit 2014).
- South King and Pierce county residents and communities, including transit-dependent, low-income, and minority populations, need long-term regional mobility and multimodal connectivity, as called for in the Washington State Growth Management Act (Revised Code of Washington 36.70A.108).

- Regional and local plans call for increased residential and/or employment density at and around high-capacity transit stations and for increased options for multimodal access.
- Environmental and sustainability goals of the state and region, as established in Washington state law and embodied in PSRC's VISION 2050 and The Regional Transportation Plan – 2018 (PSRC 2018), include reducing greenhouse gas (GHG) emissions by decreasing vehicle miles traveled (VMT).

Chapter 1 of the Draft Environmental Impact Statement (EIS) describes the need for TDLE in greater detail.

## 2.4 Definition of Section 4(f) Use

The use of a Section 4(f) property can occur when there is a permanent incorporation, temporary occupancy, or constructive use.

**Permanent incorporation** would acquire or incorporate all or part of a Section 4(f) property as part of the transportation facility.

**Temporary occupancy** occurs when the project temporarily occupies any portion of the resource, typically during construction. Temporary occupancy is not a Section 4(f) use if all the following conditions outlined in 23 CFR 774.13(d) are met:

- The duration must be temporary, *i.e.*, less than the time needed for the construction of the project, and there should be no change in ownership of the land;
- The scope of the work must be minor, *i.e.*, both the nature and the magnitude of the changes to the Section 4(f) property are minimal;
- There are no anticipated permanent adverse physical impacts, nor will there be interference with the protected activities, features, or attributes of the property, on either a temporary or permanent basis;
- The land being used must be fully restored, *i.e.*, the property must be returned to a condition which is at least as good as that which existed prior to the project; and
- There must be documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

If these criteria are met, then the “temporary occupancy exception” applies, meaning that the temporary occupancy of the land is so minimal that it does not constitute a use within the meaning of Section 4(f). If the criteria are not met, the temporary occupancy is evaluated in the same manner as a permanent use. A temporary occupancy, wherein impacts do not meet the exception criteria and are greater than *de minimis*, is considered an individual use and necessitates an evaluation of whether there is a feasible and prudent avoidance alternative.

**Constructive use** can occur when the project does not result in a permanent incorporation or temporary occupancy of the Section 4(f) resource, but the project has proximity-related impacts that substantially impair the protected activities, features, or attributes of a property. For example, a constructive use could occur if a transportation project would increase noise levels that would substantially interfere with the use of a noise sensitive feature, such as a campground or outdoor amphitheater, or where a transportation project would block the views of a park property that is primarily a scenic viewpoint (23 CFR 774.15).



A use may be approved if FTA makes a ***de minimis*** impact determination, which is a finding that the permanent incorporation or temporary occupancy of the project would not adversely affect the features, attributes, or activities that make the Section 4(f) property significant based on a consideration of impacts and mitigation measures. A ***de minimis*** impact determination for a park, recreation area, wildlife, or waterfowl refuge can only be made after receipt and consideration of public comment, and after FTA receives written concurrence from the official(s) with jurisdiction. A ***de minimis*** impact determination for a historic resource necessitates prior written concurrence from the applicable State Historic Preservation Officer (SHPO) (or Tribal Historic Preservation Officer) of “no adverse effect” or “no historic properties affected” under Section 106, and the SHPO (or Tribal Historic Preservation Officer) must be informed of the project proponent’s intent to make a ***de minimis*** impact determination. If a ***de minimis*** impact determination is made for a Section 4(f) resource, an assessment of potential avoidance alternatives is not required.

## 2.5 Approval of Projects That Use Section 4(f) Property

As the federal lead agency, the FTA may not approve a transportation use of a Section 4(f) property unless a determination is made that:

- The use of the property (permanent incorporation, temporary occupancy, constructive use) meets the requirements for a regulatory exception established under Section 4(f) (23 CFR 774.13). For instance, a temporary occupancy can be allowed if it meets the requirements described above.

Or:

- The use, including any measures to minimize harm, will have a ***de minimis*** impact on the property.

Or:

- There is no feasible and prudent avoidance alternative to using the property; and
- The program or project includes all possible planning to minimize harm to the property resulting from the use (23 CFR 774.3).

## 2.6 Study Area

Section 4(f) resources are identified within the project’s study area. For parks and recreation resources and wildlife and waterfowl refuges analysis (Section 4.17 of the Draft EIS), the study area is within 250 feet (about one block) from the light rail alignment and station footprint. For historic properties and archaeological sites, the study area is the area of potential effects (APE), which is the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties identified under Section 106 of the National Historic Preservation Act (Section 4.16 of the Draft EIS). This evaluation also considers the Draft EIS analyses from other environmental investigations, including Acquisitions, Displacements, and Relocations; Transportation; Land Use; Noise and Vibration; and Visual and Aesthetic Resources, where they identify potential impacts that extend beyond the parks and recreation or historic and archaeological study areas.

### 3 SECTION 4(F) RESOURCES IN THE TDLE STUDY AREA

This draft Section 4(f) Evaluation identified and considered the potential use of significant publicly owned parks and recreation areas and NRHP-eligible historic properties as well as the potential for constructive use. Consideration under Section 4(f) is not required when the official(s) with jurisdiction over a park, recreation area, or wildlife and waterfowl refuge determine that the property, considered in its entirety, is not significant. In the absence of a significance determination by the official with jurisdiction, FTA assumes the resource is significant.

Sound Transit also reviewed existing public agency records and plans, performed field inspections, and will continue to coordinate with the agencies that own or have jurisdiction over the resources, as needed. Sound Transit's draft Section 4(f) Evaluation is also informed by the research and coordination for Section 106 of the National Historical Preservation Act, which identify important features, qualities, and characteristics of potential historic resources.

Section 4(f) applies equally to the use of traditional cultural properties (TCPs) as historic properties. There are currently no formally designated TCPs in the study area. Sound Transit and FTA will continue to coordinate on potential TCPs as the project moves forward.

The Section 4(f) resources in the vicinity of TDLE are shown by segment in Figures D-2 through D-5 and listed in Tables D-2 through D-4.

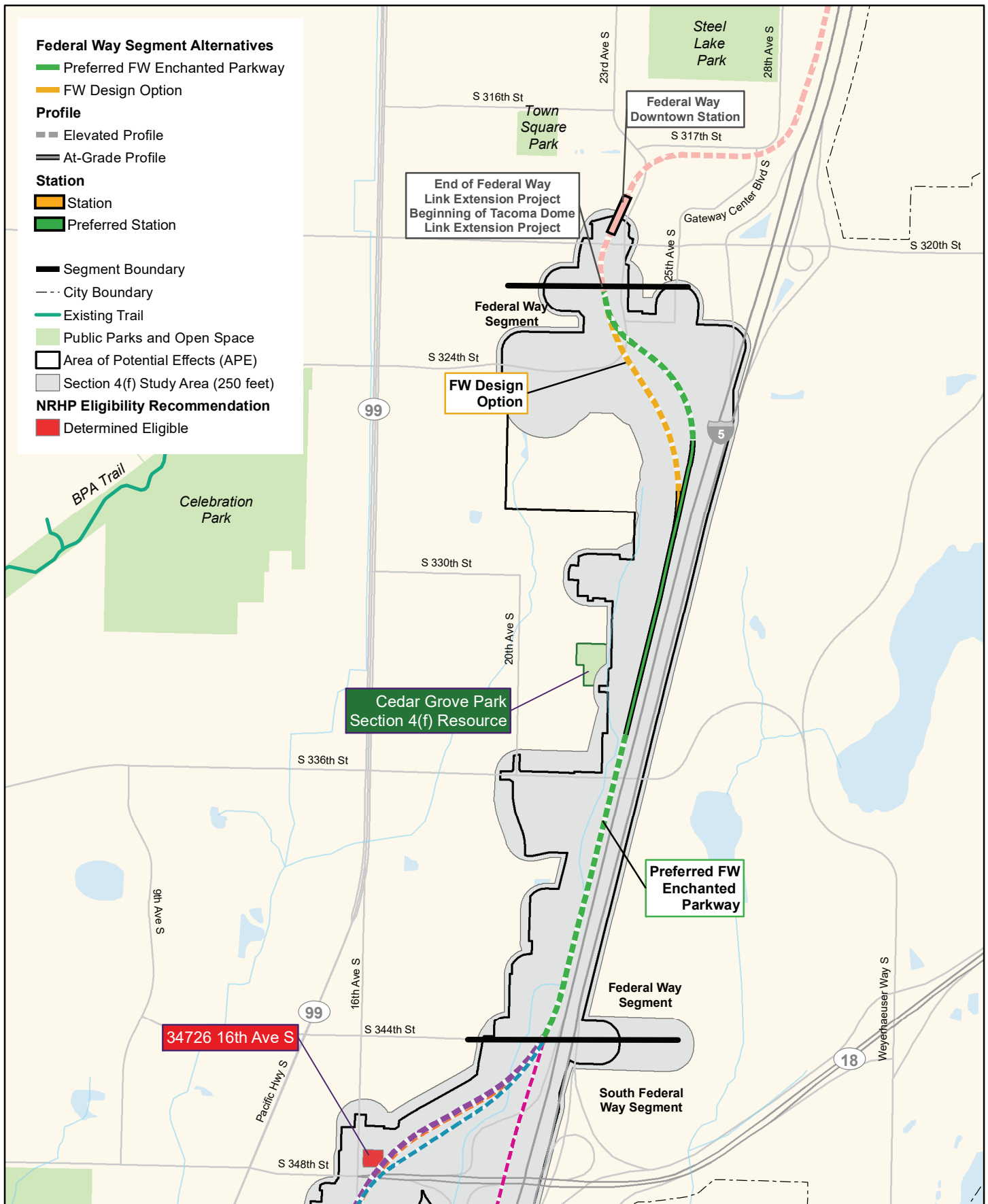
There are two planned trails within the study area, the Interurban Trail connection and the sp yal pa š Trail (Tacoma to Puyallup Regional Trail), that are used by both commuters and recreationists and have been determined to be part of the transportation system and function primarily for transportation; recreation is a secondary use. Therefore, these trails are not subject to Section 4(f) protection pursuant to 23 CFR 774.13(f)(4).

A summary of the Section 4(f) status of the parks and recreational resources in the study area is included in Attachment D.1. More information about the parks and recreational resources in the study area can be found in Section 4.17, Parks and Recreational Resources. More information about historic and archaeological resources can be found in Section 4.16, Historic and Archaeological Resources, and Appendix J.5, Historic and Archaeological Resources Technical Report.

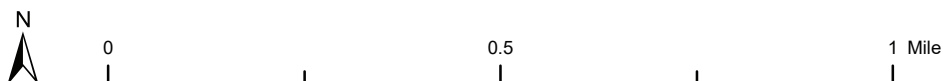
#### 3.1 Parks and Open Space Resources

As described above, Section 4(f) protects parks and recreation areas of national, state, or local significance that are both publicly owned and open to the public. According to the Section 4(f) Policy Paper (FHWA 2012), the term "significant" under Section 4(f) means that, in comparing the availability and function of the park, recreation area, or wildlife and waterfowl refuge with the park, recreation, or refuge objectives of the agency, community or authority, the property in question plays an important role in meeting those objectives. The determination of whether a resource is "significant" is made by the official(s) with jurisdiction over the property. If an official determines that a park, recreation area, or wildlife and waterfowl refuge is not significant, Section 4(f) does not apply.

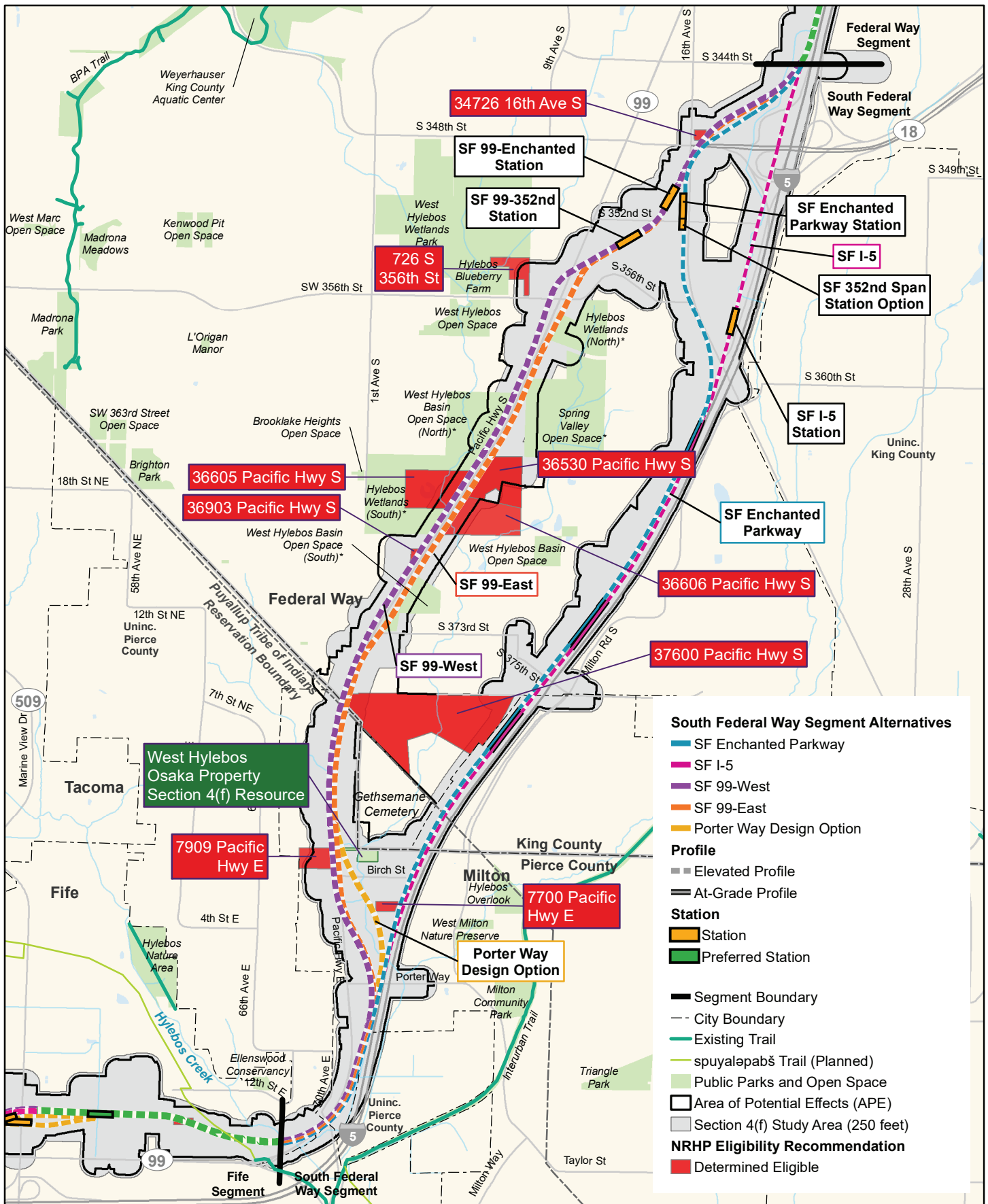
Sound Transit identified one developed public park (Cedar Grove Park in Federal Way), one planned park (Cappa Park in Fife), and the West Hylebos Osaka Property (in Milton) within the study area that are assumed to qualify as Section 4(f) properties. Those properties are described below and identified on Figures D-2 through D-5. Additional information and preliminary determinations regarding significance and Section 4(f) use is included in Attachment D.1.



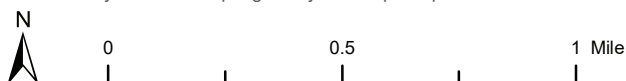
Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).  
 Park labels in bold indicate public parks and open space within the study area that are assumed to qualify as Section 4(f) properties.



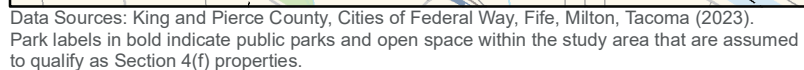
**FIGURE D-2**  
 Section 4(f) Resources  
 Federal Way Segment  
 Tacoma Dome Link Extension



Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).  
 Park labels in bold indicate public parks and open space within the study area that are assumed to qualify as Section 4(f) properties.  
 \* Collectively known as "Spring Valley Vista Open Space."

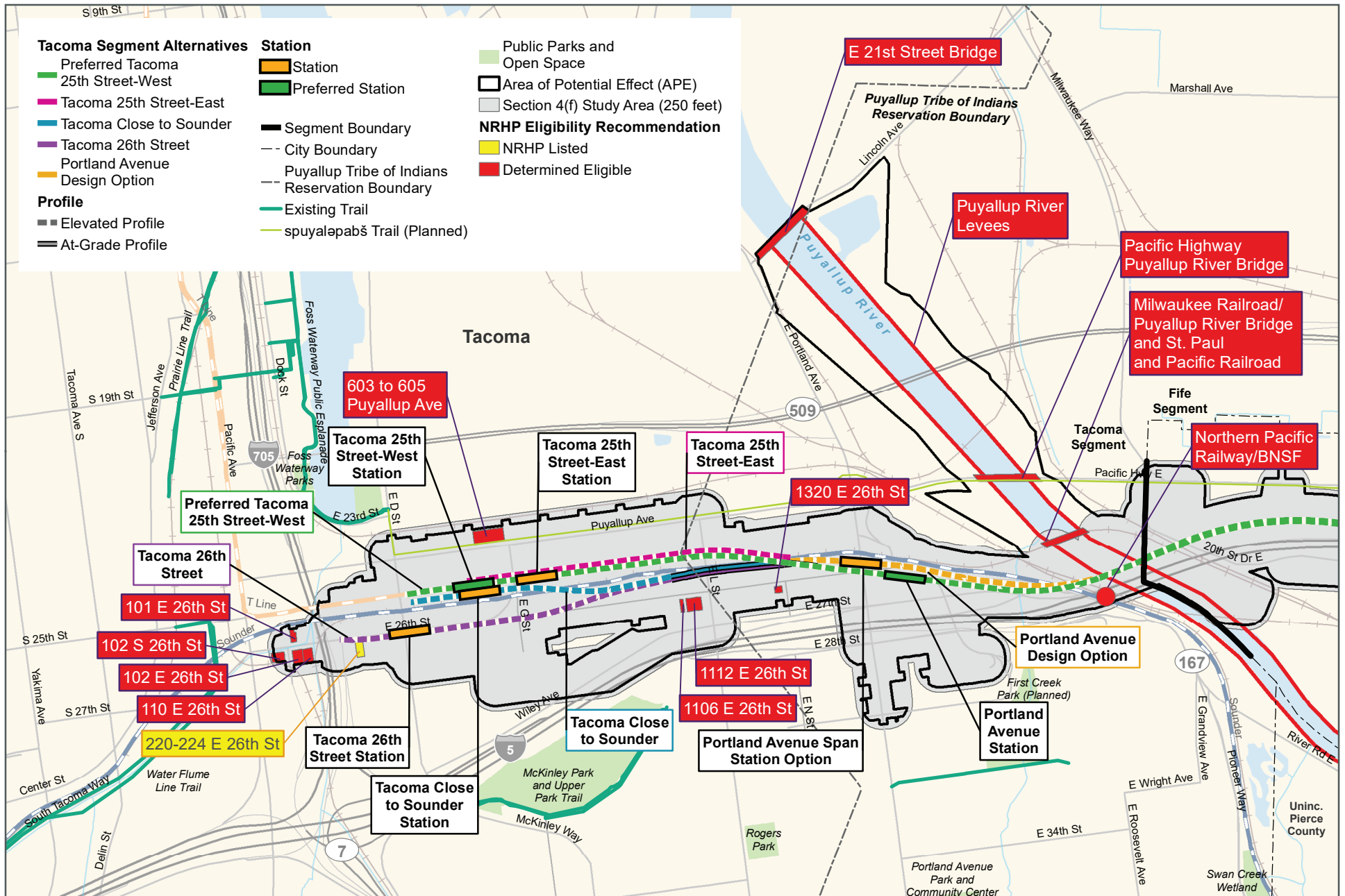


**FIGURE D-3**  
 Section 4(f) Resources  
 South Federal Way Segment  
 Tacoma Dome Link Extension

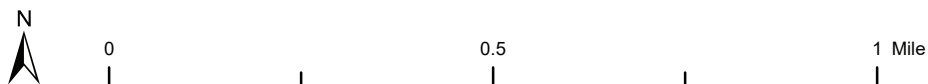


**FIGURE D-4**  
Section 4(f) Resources  
Fife Segment  
*Tacoma Dome Link Extension*





Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE D-5**  
Section 4(f) Resources  
Tacoma Segment  
Tacoma Dome Link Extension



Several properties owned by the City of Federal Way along Pacific Highway (Hylebos Wetlands (North), Spring Valley Open Space, West Hylebos Basin Open Space (North), Hylebos Wetlands (South), and West Hylebos Basin Open Space (South)), are collectively referred to as Spring Valley Vista Open Space. The City of Federal Way 2019 Parks Recreation and Open Space (PROS) Plan identifies the properties as open space and states that “acquisition of the sites has been primarily by the Public Works Department for the purposes of protection the west branch of Hylebos Creek and managing stormwater. Development of the property with active recreation uses is not likely given that the properties are encumbered with wetlands, streams, and their associated buffers.” The 2019 PROS Plan identified a potential future use for walking, birdwatching or other passive environmental appreciation and the City of Federal Way 2023-2029 Capital Improvement Plan includes funding for trails on the properties. In discussion with the City of Federal Way, the City did not provide an opinion whether the Spring Valley Vista Open Space is a Section 4(f) resource. Given that this open space has not been officially designated as park or recreation area or as a wildlife or waterfowl refuge, nor does it include recreation uses, or conservation, restoration, or management of wildlife and waterfowl resources as its primary purpose, FTA determined that Spring Valley Vista Open Space does not qualify as a Section 4(f) resource.

## Federal Way Segment

### *Cedar Grove Park*

Cedar Grove Park is a 2.7-acre neighborhood park in the City of Federal Way (Figure D-6). It includes a playground, picnic facilities, grassy open space, paved trails, and a basketball court. It is primarily surrounded by single-family residential homes, is buffered by large trees and vegetation, and is accessible via S 333rd Street and various paths through the adjacent neighborhood.



**Figure D-6** Cedar Grove Park

## South Federal Way Segment

### *West Hylebos Osaka Property*

The City of Milton’s 2024 Parks, Recreation, and Open Space Plan (2024 PROS Plan) identifies the Osaka Property as a natural area, which provides visual and psychological relief from man-made development, while providing ecological functions such as stormwater infiltration and wildlife habitat. The Plan describes that low-impact facilities such as walking trails, benches, and environmental interpretive panels may be incorporated to allow for access and engagement with nature (Figure D-7). It also acknowledges the value in leaving these acres untouched in order to preserve open space and maximize ecological function. As part of ongoing coordination, the

City of Milton has concurred on a preliminary determination that the property is significant under Section 4(f) (letter of concurrence on August 15, 2024). After the issuance and public comment on the Draft EIS, FTA will request final concurrence in writing by the City.

Based on the inclusion of the West Hylebos Osaka Property in the 2024 PROS Plan, coordination and concurrence from the City of Milton about the significance of the property, FTA is considering this property to be eligible for protection under Section 4(f).



Source: King County, Pierce County, City of Edgewood, City of Federal Way, City of Fife, City of Milton, City of Tacoma, and ESRI

**Figure D-7 West Hylebos Osaka Property**

## Fife Segment

### *Cappa Park (Planned)*

In 2020, the City of Fife acquired three parcels, totaling 4.2 acres, located between I-5 and Pacific Highway, just east of the Puyallup Tribal Integrative Medical building. The 4.2-acre property is currently developed with a single-family home. In 2022, Fife prepared a Cappa Park Site Master Plan, in conjunction with their 2022 Parks, Recreation, and Open Space Plan (City of Fife 2022a and 2022b). The Cappa Park Site Master Plan proposes an outdoor swimming pool and permanent building structures to accommodate supporting amenities, as well as parking and a small pocket park with a playground and walking path, all with egress from Pacific Highway E. All Fife Segment alternatives would be adjacent to the planned park.

## 3.2 Wildlife and Waterfowl Refuges

No designated wildlife and waterfowl refuges of national, state, or local significance have been identified in the study area.

## 3.3 Historic and Archaeological Resources

Section 4.16 of the Draft EIS, Historic and Archaeological Resources, and Appendix J5, the associated Technical Report, provide information on historic properties and archaeological sites in the TDLE APE.

There are five previously identified historic period built environmental resources that have been listed or found eligible for listing in the NRHP within the TDLE APE, including a historic firehouse

(Engine House 4); three historic bridges; and a former railroad trestle that has since been demolished. Sound Transit conducted field surveys as part of this environmental review and identified 21 additional resources in the APE that FTA determined are eligible for listing in the NRHP and SHPO concurred. The NRHP-eligible and recommended eligible historic properties are identified in Tables D-2 through D-4 and shown on Figures D-2 through D-5. No NRHP-eligible properties were identified in the Federal Way Segment.

There are two previously documented archaeological sites within the APE that may be used by TDLE and have been determined eligible for listing in the NRHP. Sound Transit conducted archaeological field surveys as part of this environmental review and found two additional archaeological sites within the APE that are recommended eligible for listing. Three of the four archaeological sites are eligible under Section 106 Criterion D, because they are likely to yield information important in prehistory or history. One of the archaeological sites, Site 45KI1586 is eligible for listing in the NRHP under Criterion A, for its association with events of National, State, and Local importance. Archaeological resources that are on or eligible for listing in the NRHP and warrant preservation in place are subject to Section 4(f). Sites that are eligible only under Criterion D typically do not warrant preservation in place and are not subject to Section 4(f) unless FTA makes a determination otherwise. The location of some potentially affected archaeological sites is sensitive information and not shown in the associated figures. It is possible additional eligible archaeological sites may be discovered during additional preconstruction surveys and construction. If archaeological sites are discovered during construction, FTA would determine if a Section 4(f) evaluation is necessary or if an exception applies.

### South Federal Way Segment

#### *Denny's Restaurant*

Denny's Restaurant, located at 34726 (Figures D-8 to D-9), is eligible for listing in the NRHP under Criterion C, based on its significance as an example of the Shed style as well as its high level of integrity, with a period of significance dating to its construction in 1978.



**Figure D-8** 34726 16th Avenue S, view southeast



**Figure D-9** 34726 16th Avenue S, view northwest



*Brooklake Community Center*

The Brooklake Community Center (Figures D-10 to D-13), located at 726 S 356th Street, is eligible for listing in the NRHP under Criteria A and C, with a period of significance dating to its construction, ca. 1929.



**Figure D-10** 726 S 356th Street, view northwest



**Figure D-11** 726 S 356th Street, view southwest



**Figure D-12** 726 S 356th Street, view north



**Figure D-13** 726 S 356th Street, view northeast

*Montessori Academy at Spring Valley*

The Montessori Academy at Spring Valley is an elementary school located at 36605 Pacific Highway S, on a large parcel that is bisected by a stream and includes an assemblage of buildings: the primary building, secondary buildings, a residence, a “natatorium” or “pool house,” and associated outbuildings, collectively referred to as the school campus (Figures D-14 to D-33). The school campus, bound by the current parcel boundary, is eligible for listing in the NRHP as a locally significant historic district under Criteria A, B, and C, with a period of significance dating from 1960.





**Figure D-14** 36605 Pacific Highway, Classrooms 1, 2, and 3, view south



**Figure D-15** 36605 Pacific Highway, Classrooms 1, 2, and 3, view north



**Figure D-16** 36605 Pacific Highway, Classrooms 4, view south



**Figure D-17** 36605 Pacific Highway, Classrooms 4, view west



**Figure D-18** 36605 Pacific Highway, Classrooms 5, view east



**Figure D-19** 36605 Pacific Highway, Classrooms 5, view southwest





**Figure D-20** 36605 Pacific Highway, Classrooms 6 and 7, view north



**Figure D-21** 36605 Pacific Highway, Classrooms 6 and 7, view southeast



**Figure D-22** 36605 Pacific Highway, Classrooms 6 and 7, Garage, view north



**Figure D-23** 36605 Pacific Highway, Classrooms 6 and 7, Wellhouse, view west



**Figure D-24** 36605 Pacific Highway, Classrooms 8 and 9, view east



**Figure D-25** 36605 Pacific Highway, Classrooms 8 and 9, view north





**Figure D-26** 36605 Pacific Highway, Residence, view west



**Figure D-27** 36605 Pacific Highway, Residence, view northeast



**Figure D-28** 36605 Pacific Highway, Residence, view southeast



**Figure D-29** 36605 Pacific Highway, natatorium, view east



**Figure D-30** 36605 Pacific Highway, Natatorium, view southwest



**Figure D-31** 36605 Pacific Highway, Conference Room, view north





**Figure D-32** 36605 Pacific Highway, Conference Room, view southeast



**Figure D-33** 36605 Pacific Highway, Conference Room Storage, view northeast, courtesy of the King County Assessor

#### *Stables and Residences at 36530A Pacific Highway S*

The two parcels located at 36530A Pacific Highway S include a number of buildings and structures associated with a horse-boarding stable, known as K.C.J. Stables, that were constructed in 1980 or earlier (Figures D-34 and D-35). The buildings are all set back 70 feet or more from the roadway and screened from view by mature trees. The stables and residences are eligible for listing in the NRHP under Criteria A and B, with a period of significance for the resource presumed to date to 1900.



**Figure D-34** 36530A Pacific Highway S, courtesy of the King County Assessor



**Figure D-35** Aerial of 36530A Pacific Highway S, courtesy of the King County Assessor

*Residence and Guest House at 36606 Pacific Highway S*

The primary residence and guest house at 36606 Pacific Highway S were constructed in 1947 and other outbuildings (garage, barn, storage structure, etc.) were added to the parcel later (Figures D-36 to D-39). The parcel is eligible for listing in the NRHP and Washington Heritage Register (WHR) under Criterion C, pending survey and inventory. The period of significance is presumed to date to its construction in 1947.



**Figure D-36** Undated photo of 36606 Pacific Highway S, courtesy of the King County Assessor



**Figure D-37** 36606 Pacific Highway S, courtesy of Redfin.com



**Figure D-38** 36606 Pacific Highway S, courtesy of Redfin.com



**Figure D-39** 36606 Pacific Highway S, courtesy of Redfin.com



*Residence at 36903 Pacific Highway S*

The residence at 36903 Pacific Highway S was constructed in 1921 and is eligible for listing in the NRHP and WHR under Criterion C, pending survey and inventory (Figures D-40 and D-41). The period of significance for the resource is presumed to date to its construction in 1921.



**Figure D-40** 36903 Pacific Highway S, undated, courtesy of the King County Assessor



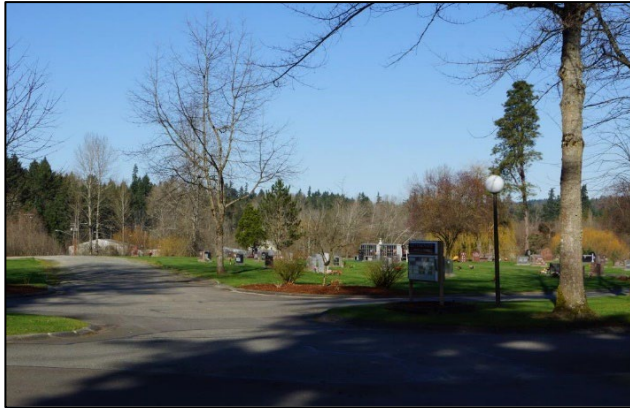
**Figure D-41** 36903 Pacific Highway S, undated, courtesy of the Redfin.com

*Site 45KI1586*

Site 45KI1586 is located to the west of I-5 and north of the King-Pierce county line. Site 45KI1586 is located on land that was formerly owned by the Catholic Church and used as part of the St. George's Indian School operations, currently within WSDOT right-of-way. Artifacts observed within Site 45KI1586 include a variety of domestic items as well as items that are likely debris from nearby construction and/or transportation activities. Domestic items include a metal pail, broken enamel ware pot, miscellaneous metal fragments, a complete milk bottle and a blue "fiesta ware" ceramic fragment that date in production to the period between the 1930s and 1940s, when the St. George's Indian School remained in operation. Indian boarding schools such as St. George's have recently gained prominence in National history with the discovery of unmarked burials at multiple Indian boarding school locations across North America. The artifacts identified in site 45KI1586 may be directly associated with operations at the St. George's Indian School. As a result, Site 45KI1586 is significant under Criterion A for its association with events of National, State and Local importance.

*Gethsemane Catholic Cemetery*

The Gethsemane Catholic Cemetery is located on two parcels addressed as 37600 Pacific Highway S (Figures D-42 through D-45). It is a designated historic landscape with functionally related units (Mortuary and Mausoleums) under Criteria A and C because it is the location of a relatively peaceful protest that resulted in the return of culturally significant land to the Puyallup Tribe as well as a relatively intact example of a smaller mid-20th-century memorial park.



**Figure D-42** 37600 Pacific Highway S, view southwest



**Figure D-43** 37600 Pacific Highway S, view south



**Figure D-44** 37600 Pacific Highway S, view northeast



**Figure D-45** 37600 Pacific Highway S, view southwest



*Daffodil Motel*

The Daffodil Motel, located at 7909 Pacific Highway E, consists of three buildings around an internal courtyard, with a large neon sign located on the edge of the highway (Figures D-46 to D-48). The sign is double-sided and is made up of a blade sign beside a figurative daffodil topped by a cloud-like form. The sign reads “Daffodil Motel.” An attached marquis vacancy sign reads “Special/Always Free/Movies/New Releases/922-7000” and includes an arrow. Based on its architectural significance as a relatively intact roadside motel, 7909 Pacific Highway E is eligible for listing in the NRHP and WHR at the local level under Criterion C. The building’s significance dates to its construction ca. 1948.



**Figure D-46** 7909 Pacific Highway E, view northwest



**Figure D-47** 7909 Pacific Highway E, view northwest



**Figure D-48** 7909 Pacific Highway E, view west



*Commercial Building at 7700 Pacific Highway E*

The showroom at 7700 Pacific Highway is eligible for listing in the NRHP and WHR at the local level under Criterion C as an example of roadside architecture (Figures D-49 and D-50). The building's significance dates to its construction in 1978.



**Figure D-49** 7700 Pacific Highway E, view southeast



**Figure D-50** 7700 Pacific Highway E, view south

## Fife Segment

### *Residence at 1309 62nd Avenue E*

The vacant residence located at 1309 62nd Avenue E is eligible for listing on the NRHP under Criteria A, B, and C as a representative example of a Craftsman-inspired farmhouse associated with broad patterns of history, including farming in Fife (Gardenville) and possibly the internment of Japanese Americans during World War II, as well as for its association with significant people, including the Yamasaki family (Figures D-51 and D-52).



**Figure D-51** 1309 62nd Avenue E, view east



**Figure D-52** 1309 62nd Avenue E, with Garage to the East, view southeast

### *Pick-Quick Drive In*

The Pick-Quick property, located at 4306 Pacific Highway and currently operating as a drive-in restaurant, is eligible for listing in the NRHP under Criterion A for its associations with mid-century development trends and under Criterion C as an example of roadside architecture (Figures D-53 and D-54).



**Figure D-53** 4306 Pacific Highway E, view southwest



**Figure D-54** 4306 Pacific Highway E, view southeast

## Tacoma Segment

### *Puyallup River Crossings and Milwaukee, St. Paul, and Pacific Railroad*

Three bridge crossings of the Puyallup River have been determined eligible for listing in the NRHP (Puyallup River Bridge, E 21st Street Bridge, and Milwaukee Railroad Bridge; Figures D-55 through D-57). The Puyallup River Bridge (Pacific Highway E crossing) was determined eligible by FHWA in 2013, and the East 21st Street Bridge (Lincoln Avenue crossing) was determined eligible by FHWA in 2008, but the criteria was undetermined. The Milwaukee Railroad Bridge was determined eligible by FHWA in 2009 based on Criteria A and C, and the Milwaukee, St. Paul, and Pacific Railroad (formerly Tacoma Eastern Railroad) was determined eligible by DAHP in 2021 based on Criteria A.



**Figure D-55 Puyallup River Bridge (Pacific Highway E crossing)**



**Figure D-56 E 21st Street Bridge (Lincoln Avenue crossing)**



**Figure D-57 Milwaukee Railroad – Puyallup River Bridge**



### *Puyallup River Levees*

The Puyallup River, flanked to the east by the City of Fife and to the west by the City of Tacoma, is diked and runs between raised levees on both the east and west banks of the river, which flows north under a series of road and railroad bridges towards Commencement Bay in the vicinity of the APE. The levee sections in the APE are a small part of a much larger flood control system that seeks to limit flooding in the Puyallup River watershed (Puyallup River Watershed Council 2014). Within the APE, the levees appear as earthen berms topped by vegetation and single-lane graveled paths identified as private extensions of N Levee Road E (east bank) and River Road E (west bank) (Figures D-58 and D-59). Based on their significance and integrity, the levees on the banks of the Puyallup River in the APE are eligible for listing in the NRHP under Criterion A for their historic associations with Pierce County's flood control effort in the Puyallup River Valley.



**Figure D-58** Puyallup River Levees, view north from the I-5 Bridge



**Figure D-59** Puyallup River Levees, view south from the I-5 Bridge

### *Northern Pacific Railway/BNSF*

The Northern Pacific was significant as the second transcontinental railroad and the first to terminate at the Puget Sound. While the small section of railbed within the APE is part of a much larger whole, it is eligible for listing in the NRHP for its associations with transportation and the development of Tacoma under Criterion A (Figures D-60 and D-61).



**Figure D-60** BNSF Rail from I-5, West Bank of the Puyallup River, view north



**Figure D-61** BNSF Rail and Bridge from I-5, West bank of the Puyallup River, view south

*Engine House 4 – Tacoma Fire Station No. 4*

Engine House 4 at 220-224 E 26th Street is a two-story brick firehouse with classically inspired terra cotta details and a prominent four-story hose tower but is no longer operating as a fire station (Figure D-62). It is listed on the NRHP under Criteria A and C, as an early 20th-century fire station.



**Figure D-62 Engine House No. 4**

*1320 E 26th Street*

The residence located at 1320 E 26th Street is eligible for listing on the NRHP under Criteria C as an example of a Craftsman bungalow (Figure D-63). Its period of significance dates to its construction in 1914.



**Figure D-63 Residence at 1320 E 26th Street, view south**

*1112 E 26th Street*

The residence located at 1112 26th Street is eligible for listing on the NRHP under Criteria C as a good example of an American Foursquare, a subset of Prairie style (Figures D-64 to D-66). Its period of significance dates to its construction in 1903.



**Figure D-64** Residence at 1112 E 26th Street, view southwest



**Figure D-65** Residence at 1112 E 26th Street, view southeast



**Figure D-66** 1112 E 26th Street, 1977, courtesy of Tacoma Public Library, view south



*1106 E 26th Street*

The residence at 1106 E 26th Street has been recommended eligible for listing on the NRHP under Criteria C, as a modest example of a Queen Anne residence (Figures D-67 to D-69). The building's period of significance dates to its construction in 1903.



**Figure D-67** Residence at 1106 E 26th Street, view southwest



**Figure D-68** Residence at 1106 E 26th Street, view southeast



**Figure D-69** 1106 E 26th Street, 1977, courtesy of Tacoma Public Library, view south

**603-605 Puyallup Avenue**

The building located at 603–605 Puyallup Avenue is eligible for listing in the NRHP under Criteria A and C, as a local representation of a streamlined Modern office building and warehouse, with a period of significance dating to its construction ca. 1945 (Figures D-70 to D-73).



**Figure D-70** BNSF Freight Warehouse at 603–605 Puyallup Avenue, view northwest



**Figure D-71** BNSF Freight Warehouse at 603–605 Puyallup Avenue, view northeast



**Figure D-72** 603–605 Puyallup Avenue, 1948, view northeast, courtesy of Tacoma Public Library



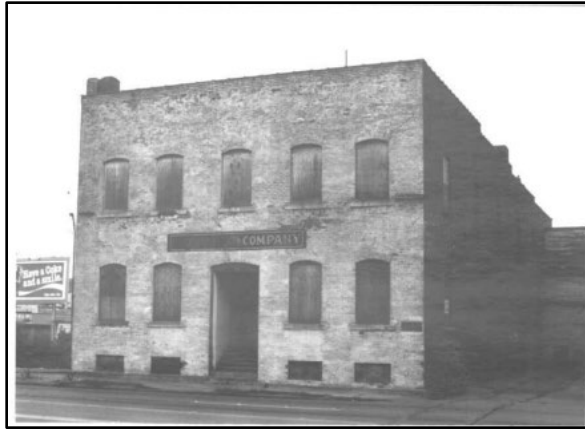
**Figure D-73** 603–605 Puyallup Avenue, 1948, view northeast, courtesy of Tacoma Public Library

*101 E 26th Street*

The building at 101 E 26th Street is eligible for listing in the NRHP and WHR under Criteria A and C as a representative example of an early 20th-century, one-party commercial block, with a period of significance of 1909–1957 (Figures D-74 and D-75).



**Figure D-74 Commercial Building at 101 E 26th Street, Facade and East Elevation, view northwest**



**Figure D-75 Commercial Building at 101 E 26th Street, Facade and East Elevation, view northwest in an undated photograph, image courtesy of the Department of the Interior (2020)**

*102 S 26th Street*

The building at 102 S 26th Street is eligible for listing in the NRHP and WHR under Criteria A and C as a local representation of an Art Deco, one-part commercial block with a period of significance of 1937 (Figures D-76 and D-77).



**Figure D-76 Commercial Building at 102 S 26th Street, Facade and West Elevation, view southeast**



**Figure D-77 Commercial Building at 102 S 26th Street, East Elevation, view west**



*110 E 26th Street*

The building at 110 E 26th Street is eligible for listing in the NRHP and WHR under Criteria A and C as a distinctive manufacturing plant based on its significance and relatively high degree of integrity from the historic period (Figures D-78 and D-79). Its period of significance dates to its construction in 1902.



**Figure D-78 Almond Roca Factory at 110 E 26th Street, view southwest**



**Figure D-79 Original Brown and Haley Factory at 110 E 26th Street, 1948, courtesy of Tacoma Public Library**

*102 E 26th Street*

The building at 102 E 26th Street is eligible for listing in the NRHP and WHR under Criteria A and C as a distinctive New Formalist structure associated with the 1962 World's Fair (Figures D-80 and D-81). Its period of significance dates to its construction in 1962.



**Figure D-80 Pavilion at 102 E 26th Street, view southwest**



**Figure D-81 Pavilion at 102 E 26th Street, view southeast**

### 3.4 Cemeteries

There are two historic cemeteries located within the APE: Gethsemane (archaeological resource ID 45KI866 and property IDs 537584 and 725425) and St. George's (archaeological resource ID 45KI867). They are adjacent to each other between Pacific Highway and I-5 along the King/Pierce county line. Additional information on these cemeteries can be found in Appendix J5, Historical and Archaeological Resources Technical Report.

### 3.5 Traditional Cultural Properties

Section 4(f) applies equally to the use of TCPs as historic properties. There are currently no formally designated TCPs within the APE. Sound Transit and FTA will continue to coordinate on potential TCPs as the project moves forward.

## 4 POTENTIAL USE OF SECTION 4(F) RESOURCES

This section summarizes the potential use of Section 4(f) properties in the study area. Where this evaluation concludes there will be no Section 4(f) use, it means the property would not be permanently incorporated into a transportation facility, there would be no temporary occupancy of land that is adverse in terms of the Section 4(f) statute's preservationist purposes, and no proximity impacts would substantially diminish the protected activities, features, or attributes of the Section 4(f) property.

TDLE's potential Section 4(f) use of historic properties could include acquiring a portion of a historic property or an adverse effect where an alternative requires removal of an eligible building. Up to eight NRHP-listed, eligible, or recommended eligible historic properties in the study area may be used by a project alternative, all of which FTA has preliminarily determined as being adversely affected.

TDLE may require the permanent incorporation of archaeological resources, primarily through ground disturbance during construction. In the South Federal Way Segment, the SF Enchanted Parkway and SF I-5 alternatives would both use portions of Site 45KI1586, which is eligible under Criterion A for its association with St. George's Indian School unevaluated for listing under Criterion D. All alternatives in the Fife Segment could affect one eligible archaeological resource, and all alternatives in the Tacoma Segment could affect two eligible archaeological resources.

Archaeological resources that are on or eligible for listing in the NRHP and warrant preservation in place are subject to Section 4(f) except when the resource is important chiefly because of what can be learned by data recovery and has minimal value for preservation in place (23 CFR 774.13(b)). Therefore, all but one of the known archaeological sites within the APE that are eligible for listing in the NRHP are not recommended to be Section 4(f) properties, because they are eligible based only on their value for yielding information important in prehistory or history (Criterion D) and do not warrant preservation in place. Therefore, they do not qualify as Section 4(f) resources. Only Site 45KI1586, which is recommended eligible under Criterion A and unevaluated for listing under Criterion D, and warrants preservation in place, is a Section 4(f) resource. The location of some archaeological sites that may be used by TDLE is sensitive information and not shown on the associated figures. It is possible that additional eligible sites could be discovered and potentially used during construction.



The Section 4(f) resources and an assessment regarding TDLE's use of those resources is summarized in Tables D-2 through D-4. These tables also identify the potential use of Section 4(f) resources. No temporary occupancy or constructive use of Section 4(f) resources is anticipated for TDLE. Assessments of effects to individual historic properties are preliminary and have not been formally determined by FTA. Final effects determinations are pending additional consultation with the SHPO, Tribes, and other consulting parties.

### Federal Way Segment

No Section 4(f) resources would be used in the Federal Way Segment. Although Cedar Park is within 250 feet of both alternatives in this segment (with or without the SF Design Option), none of the build alternatives would require land from Cedar Grove Park for either construction or operation of TDLE. The TDLE guideway may be visible from portions of the park but would be screened by trees, existing single-family residences, and 24th Avenue S. Similarly, noise from construction may increase at the park but, given the park's proximity to I-5 and existing noise near the park, would not be anticipated to substantially impair the park's activities, features, or attributes that qualify the park for protection under Section 4(f). Some construction traffic may travel near the park at times but would not restrict access. Therefore, there would be no Section 4(f) use.

### South Federal Way Segment

Up to six Section 4(f) properties could be used by various alternatives in the South Federal Way Segment, along with the *de minimis* impact on up to seven additional properties, as identified in Table D-5.

**Table D-5 Summary of Preliminary Section 4(f) Use Determinations by Alternative for the South Federal Way Segment**

Resource	SF Enchanted Parkway	SF I-5	SF 99-West <sup>1</sup>	SF 99-East <sup>1</sup>
Denny's Restaurant at 34726 16th Avenue S	No use	No use	<i>De minimis</i>	<i>De minimis</i>
Brooklake Community Center, 726 S 356th Street, Federal Way	No use	No use	No use	No use
Montessori Academy at Spring Valley, 36605 Pacific Highway S, Federal Way	No use	No use	Use	No use
K.C.J. Stables and Residence, 36530A Pacific Highway S, Federal Way	No use	No use	Use	Use
Residence at 36606 Pacific Highway S, Federal Way	No use	No use	No use	Use
Residence at 36903 Pacific Highway S, Federal Way	No use	No use	Use	<i>De minimis</i>
Gethsemane Catholic Cemetery	No use	No use	No use	No use
Site 45K11586	Use	Use	No use	No use
West Hylebos Osaka Property (Milton)	No use	No use	<i>De minimis</i> only with Porter Way Design Option	<i>De minimis</i> only with Porter Way Design Option
Daffodil Motel, 7909 Pacific Highway E, Milton	No use	No use	Use	No use
Commercial Building at 7700 Pacific Highway E, Milton	No use	No use	No use	No use

Notes:

(1) Preliminary Section 4(f) use determinations apply with or without the Porter Way Design Option unless otherwise specified.

*Denny's Restaurant at 34726 16th Avenue S*

The Denny's Restaurant located at 34726 16th Avenue S is recommended eligible for listing on the NRHP and is located west of all alternatives in the South Federal Way Segment. The SF 99-West and the SF 99-East alternatives would be located behind the structure to the east, and the track would be elevated approximately 40 feet above it, permanently acquiring about 0.03 acre in the southwest corner, and using this parcel temporarily for construction. While the SF 99-West and the SF 99-East alternatives would add an element to the rear and approximately 40 feet above the resource, FTA has preliminarily determined that the effect would not be adverse, because locating TDLE to the rear of this building would not diminish any of the characteristics that qualify it for listing in the NRHP. Given that the building and its key features and activities would remain, FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that these alternatives would have no adverse effect under Section 106. As such, FTA has made a preliminary determination that it would qualify as a *de minimis* impact under Section 4(f), which will be finalized after Section 106 consultation.

The SF Enchanted Parkway Alternative would be located farther to the east of the structure and the SF I-5 Alternative is not in the vicinity of the structure, with no temporary occupancy or permanent incorporation. Therefore, these alternatives would add an additional transportation element within a developed commercial area, but would not diminish the characteristics that qualify the resources for listing. FTA has preliminarily determined that the SF Enchanted Parkway and SF I-5 alternatives would not have an adverse effect under Section 106 or use this Section 4(f) property.

*Brooklake Community Center at 726 S 356th Street*

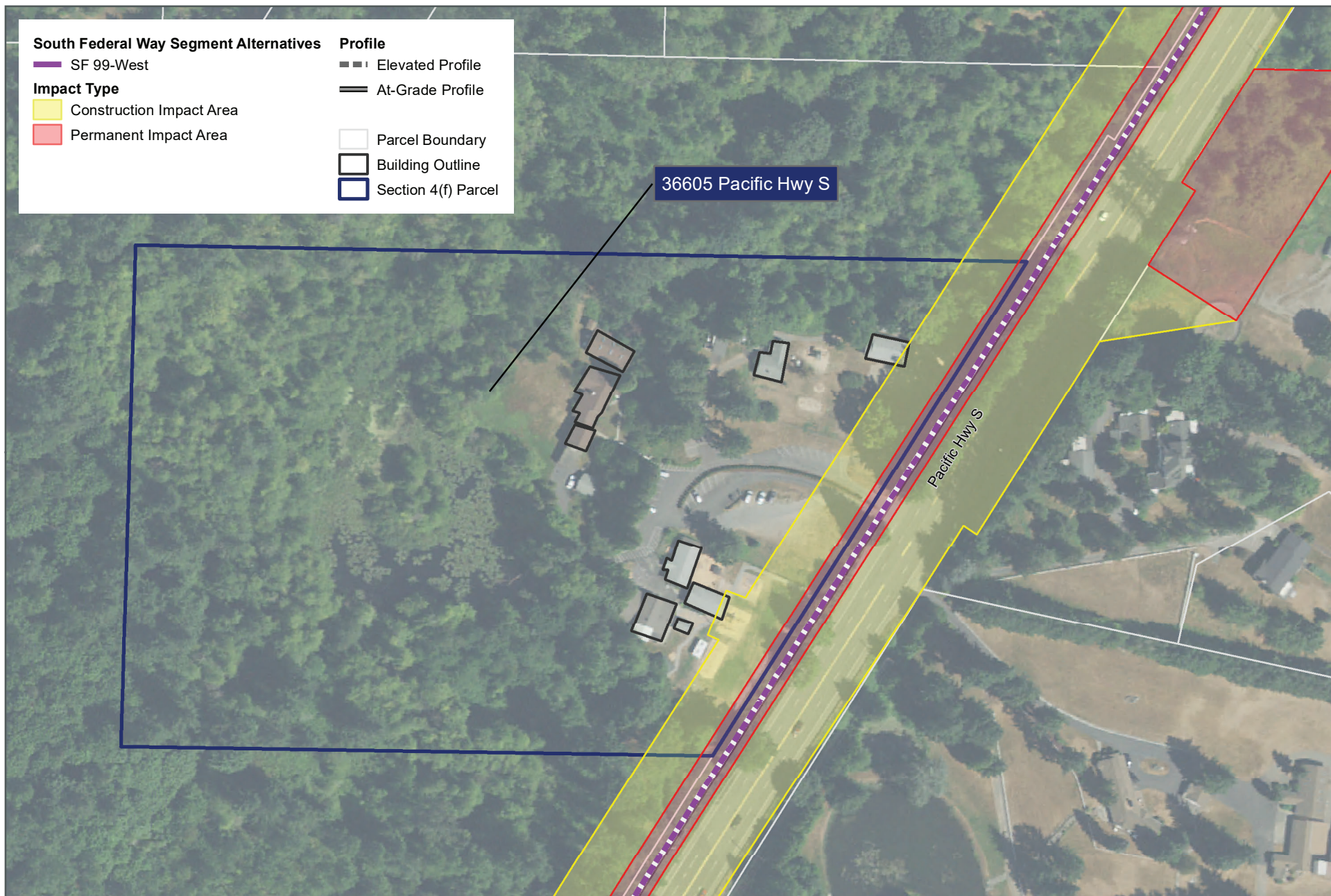
The historic buildings at the Brooklake Community Center, 726 S 356th Street, are located to the west of all of the alternatives and heavily shielded by distance, topography, and/or deep screens of mature foliage that act to shield the built resources from traffic along Pacific Highway. The screens of mature foliage adjacent to the Brooklake Community Center are not anticipated to be greatly diminished during construction. FTA, in consultation with the SHPO (the official with jurisdiction over the resource) has preliminarily determined that none of the alternatives would have an adverse effect under Section 106 or use this Section 4(f) property.

*Montessori Academy at Spring Valley and Residence at 36605 Pacific Highway S*

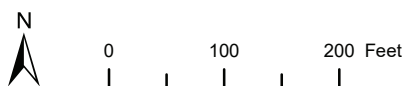
The SF 99-West Alternative with or without the Porter Way Design Option would require a partial acquisition of the school and residence at 36605 Pacific Highway S, which FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined would constitute an adverse effect under Section 106 and the use of a Section 4(f) property. Figure D-82 illustrates this potential use.

The remaining alternatives (SF Enchanted Parkway, SF I-5, and SF 99-East) in the South Federal Way Segment are separated from this location by the highway and existing screens of mature foliage, which would remain, so would have no adverse effect under Section 106 or use of the Section 4(f) resource.





Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE D-82**  
 Section 4(f) Use of School and Residence  
 SF 99-West Alternative  
*Tacoma Dome Link Extension*

*K.C.J. Stables and Residence at 36530A Pacific Highway S*

Both the SF 99-East and SF 99-West alternatives, with or without the Porter Way Design Option, would require partial acquisition of property along the western boundary of the parcel at 36530A Pacific Highway S. Both would require the removal of screening trees or other features of the resource that qualify it for listing in the NRHP.

The SF 99-East Alternative would also require the demolition of a secondary outbuilding (believed to be a shed or garage added ca. 1977) in addition to the potential removal of screening trees on the property or other features that qualify the residence for listing in the NRHP. As a result, FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that both the SF 99-East and SF 99-West alternatives would have an adverse effect under Section 106 and would constitute the use of a Section 4(f) property. Figure D-83 illustrates this potential use.

No use of this Section 4(f) resource would occur for the SF Enchanted Parkway or SF I-5 alternatives.

*Residence at 36606 Pacific Highway S*

The residence at 36606 Pacific Highway S has been recommended eligible for listing on the NRHP. The SF 99-East Alternative would potentially require the removal of screening trees located on the property and diminish the residence's integrity of setting, which FTA has preliminarily determined would be an adverse effect under Section 106 and would constitute the use of a Section 4(f) property.

The SF 99-West alternatives in the South Federal Way Segment would be separated from the property by the highway and existing screens of mature foliage would remain, so FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that this would not constitute an adverse effect under Section 106. As such, FTA has made a preliminary determination that it would qualify as a *de minimis* impact under Section 4(f), which will be finalized after Section 106 consultation.

No use of this Section 4(f) resource would occur for the SF Enchanted Parkway or SF I-5 alternatives.

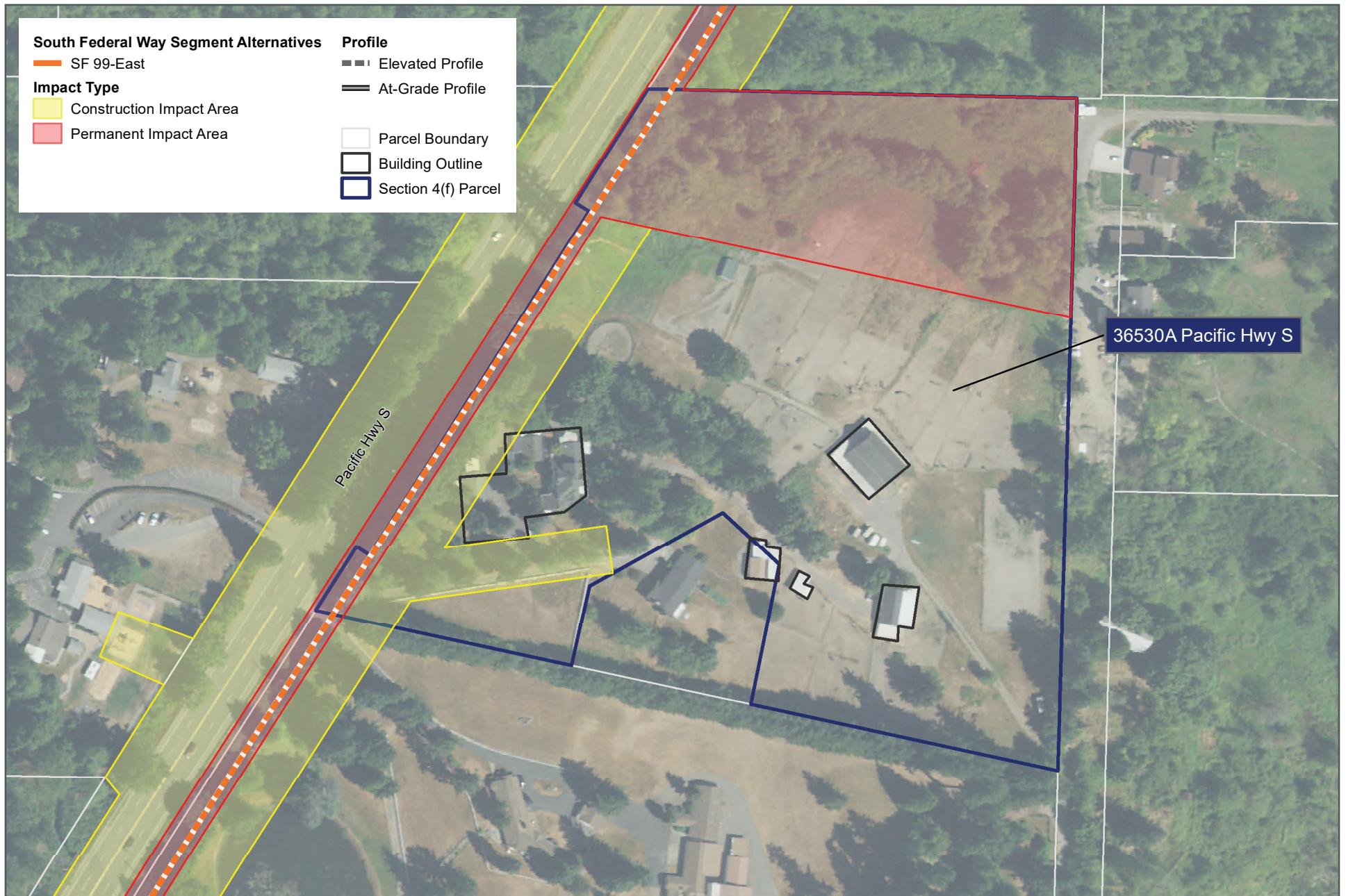
*Residence at 36903 Pacific Highway S*

The residence at 36903 Pacific Highway S has been determined to be eligible for the NHRP. The SF 99-West Alternative, with or without the Porter Way Design Option, would demolish the NRHP-eligible building at this location, which FTA has preliminarily determined would constitute an adverse effect under Section 106 and the use of Section 4(f) property. Figure D-84 illustrates this potential use.

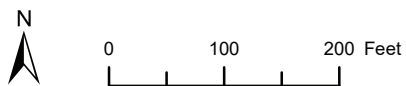
The SF 99-East Alternative would require permanent incorporation and temporary occupancy of approximately 20 percent of the property at 36903 Pacific Highway S to construct and provide access to a stormwater pond on an adjacent parcel but would not require demolition or otherwise adversely affect the residence. The SF 99-East Alternative would be separated from the property by the highway and existing screens of mature foliage would remain, so FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that this would not constitute an adverse effect under Section 106. As such, FTA has made a preliminary determination that it would qualify as a *de minimis* impact under Section 4(f), which will be finalized after Section 106 consultation.

No use of this Section 4(f) resource would occur for the SF Enchanted Parkway or SF I-5 alternatives.



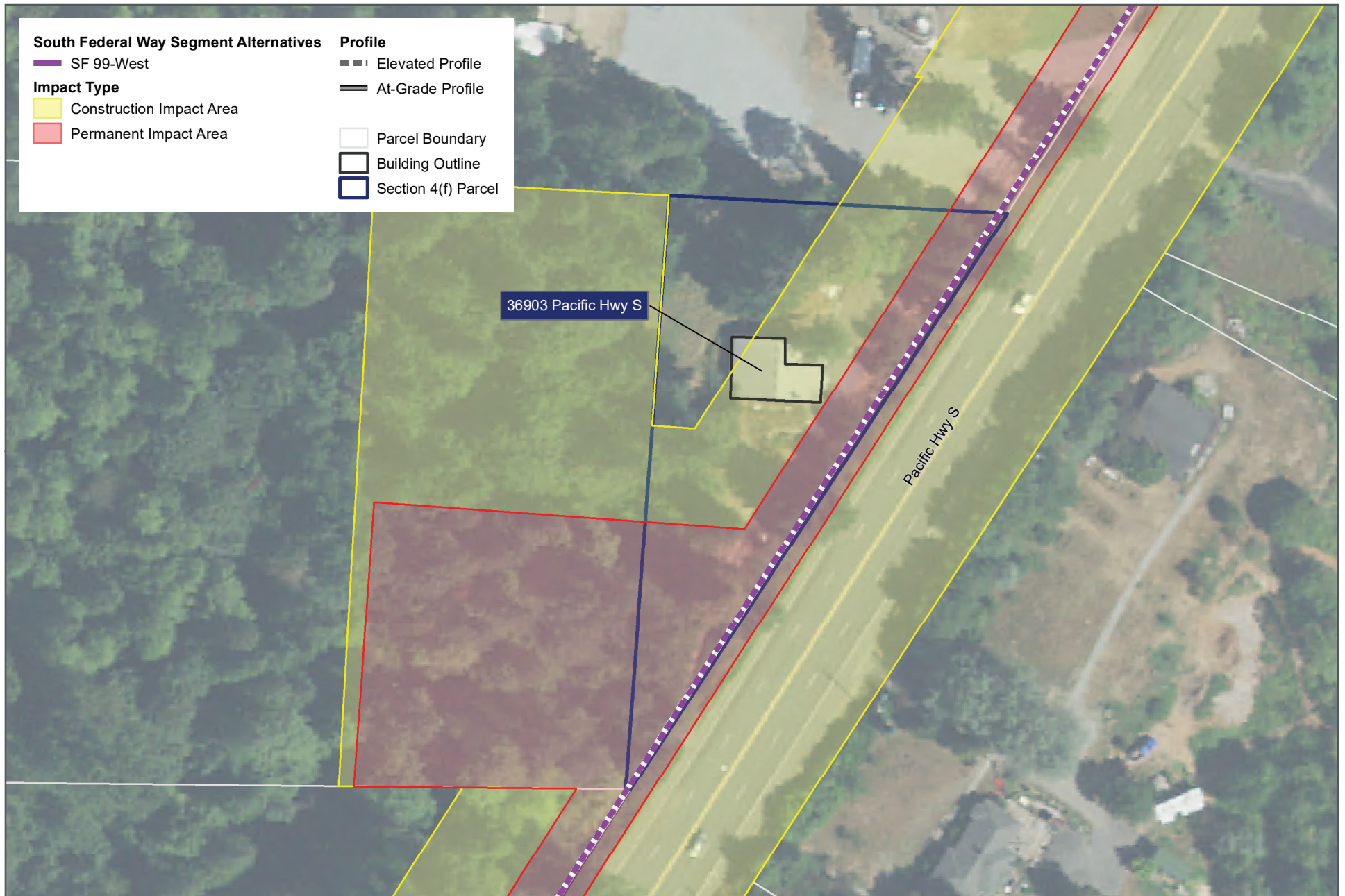


Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).

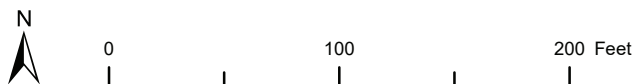


**FIGURE D-83**  
 Section 4(f) Use of Residence and Stables  
 SF 99-East Alternative  
 Tacoma Dome Link Extension





Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE D-84**  
 Section 4(f) Use of Residence  
 SF 99-West Alternative  
*Tacoma Dome Link Extension*

*Gethsemane Catholic Cemetery at 37600 Pacific Highway S*

The Gethsemane Catholic Cemetery is recommended eligible for the NRHP as a designated landscape). The SF 99-West and SF 99-East alternatives would both be located adjacent to the cemetery. The SF 99-East Alternative would require alterations to the entrance and exit lanes outside the boundaries of the cemetery, but access would be maintained throughout construction. While the light rail guideway would be visible from within the cemetery, it would not diminish the characteristics that qualify the resource for listing under Section 106 and eligibility under Section 4(f). Therefore, none of the alternatives in the South Federal Way Segment would have an adverse effect under Section 106 or would result in a use of Section 4(f) property.

*Site 45KI1586*

Ground disturbance would occur within the boundaries of NRHP-eligible site 45KI1586 and would require the permanent incorporation of some of the parcel for the placement of column footings and temporary occupancy during construction of the guideway for the SF Enchanted Parkway or SF I-5 alternatives. FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has made a preliminary determination that TDLE would have an adverse effect under Section 106 and would constitute a Section 4(f) use.

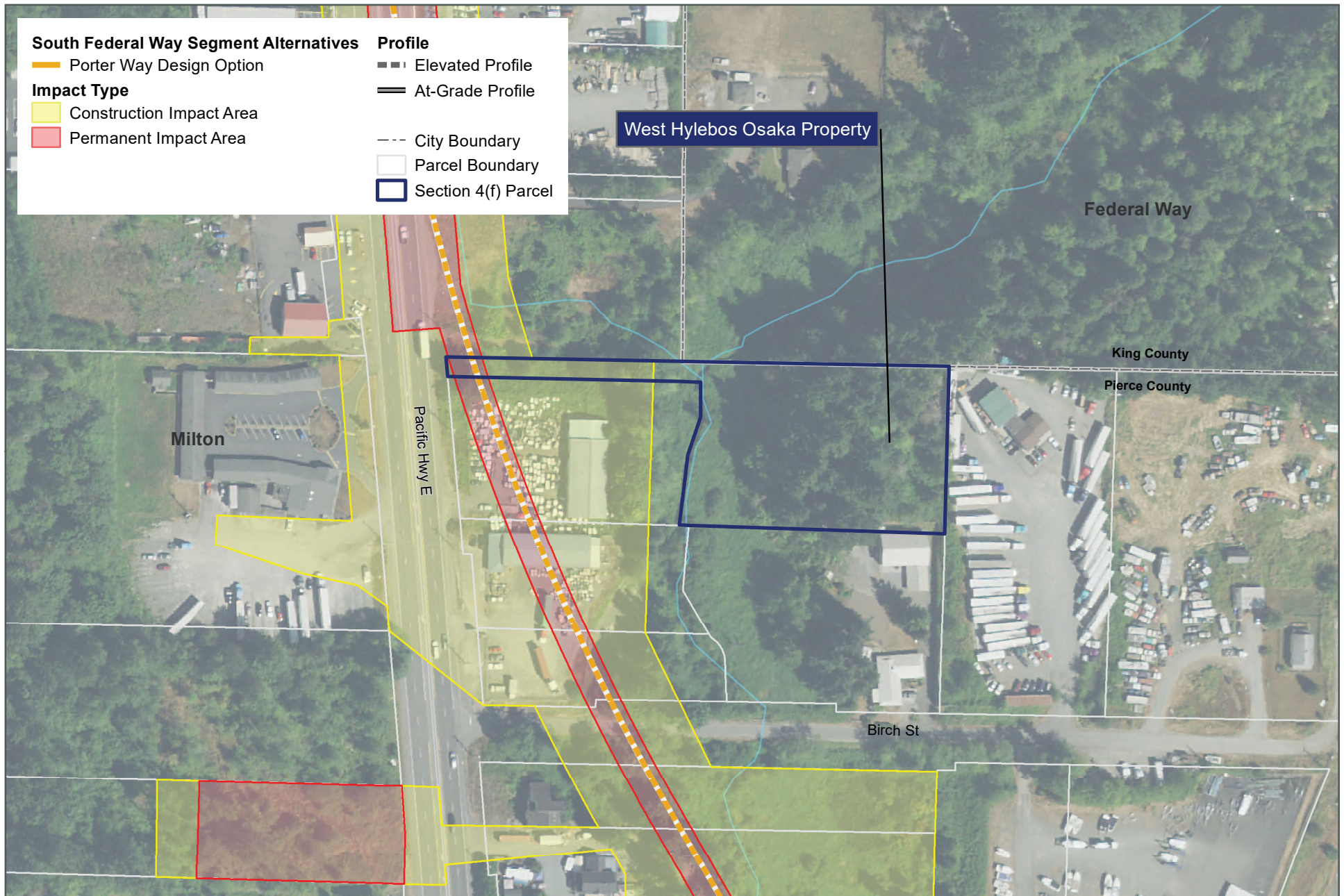
No adverse effect under 106 or Section 4(f) use would occur for the SF 99-West or SF 99-East alternatives.

*West Hylebos Osaka Property*

The Porter Way Design Option, with both the SF 99-West or SF 99-East alternatives, would require the permanent incorporation of 0.02 acres and the temporary occupation of 0.13 acre of the West Hylebos Osaka Property. The property is adjacent to a parcel that would potentially be acquired to construct a stormwater pond for the project. During construction, existing access would be maintained to the extent feasible, and the City of Milton would be compensated for necessary acquisitions. Sound Transit would financially compensate for temporarily using this area during construction. Following construction, disturbed areas would be restored and the property would remain as a natural area, in consultation with the City. Figure D-85 illustrates the proximity of the Porter Way Option (associated with either the SF 99-West or SF 99-East alternatives) to the property. As part of ongoing coordination with the City of Milton, Sound Transit requested a preliminary concurrence that the Porter Way Design Option with both the SF 99-West and SF 99-East alternatives would have a *de minimis* impact to the West Hylebos Osaka Property. The City concurred on August 15, 2024 (see Attachment D.2). After the issuance and public comment on the Draft EIS, FTA will request final concurrence in writing by the City.

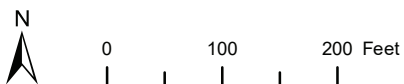
No use would occur for the SF Enchanted Parkway or SF I-5 alternatives.





Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).

**FIGURE D-85**  
 Section 4(f) Use of West Hylebos Osaka Property  
 Porter Way Design Option with SF 99-West or SF 99-East Alternatives  
*Tacoma Dome Link Extension*



Daffodil Motel and Signage at 7909 Pacific Highway E

The Daffodil Motel and its signage have been recommended as eligible for the NRHP. The SF 99-West Alternative, with or without the Porter Way Design Option, would require partial acquisition and demolition or relocation of the motel's signage along the highway, which has the potential to diminish the resource's integrity of setting, design, materials, and workmanship, which FTA has preliminarily determined would be an adverse effect under Section 106 and would constitute the use of a Section 4(f) property. Figures D-86 and D-87 illustrate the proximity of the SF 99-West and SF 99-East alternatives to the property.

The SF 99-East Alternative in the South Federal Way Segment is separated from the location by the highway, and would not diminish the integrity of any characteristics that qualify the resource for listing, so FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has made a preliminary determination that it would not have an adverse effect under Section 106 or constitute a Section 4(f) use.

No use of this Section 4(f) resource would occur for the SF Enchanted Parkway or SF I-5 alternatives.

Commercial Building at 7700 Pacific Highway E

The commercial building is located off Pacific Highway on a parcel that flanks I-5 and has been recommended eligible for listing on the NRHP. Construction of the SF Enchanted Parkway Alternative, the SF I-5 Alternative, or the SF 99-West or SF 99-East alternatives with the Porter Way Design Option may add a visual element to its viewshed, but the protected activities, features, or attributes of the Section 4(f) property would not be substantially diminished by any alternative as long as the building retains its views to and from I-5. No long-term effect is anticipated in association with any of the alternatives in the South Federal Way Segment. Therefore, FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that no adverse effect under Section 106 or use of Section 4(f) property is anticipated.

Fife Segment

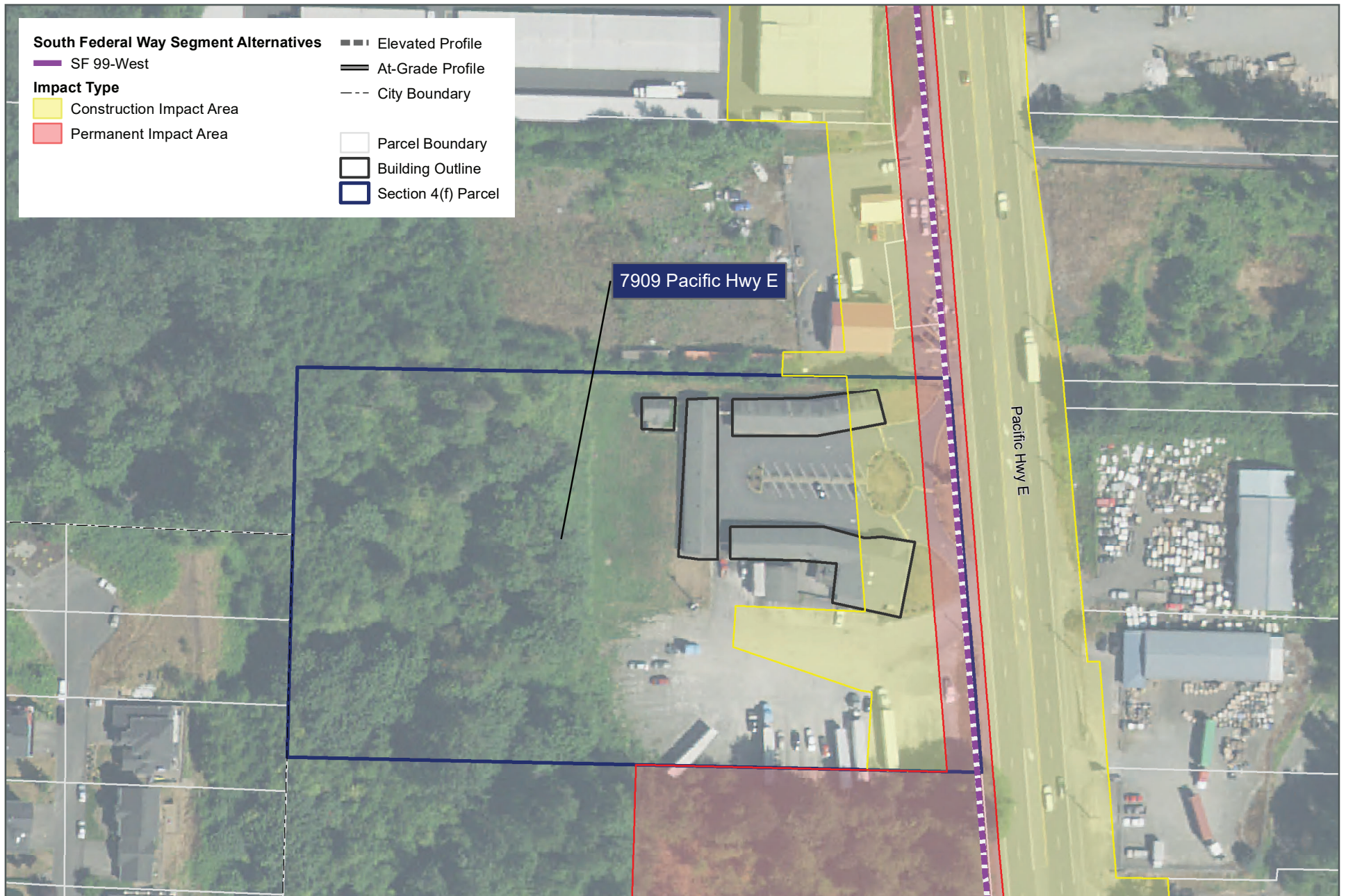
Up to two Section 4(f) properties could be used by various alternatives in the Fife Segment, as identified in Table D-6.

Table D-6      Summary of Preliminary Section 4(f) Use Determinations by Alternative for the Fife Segment<sup>1</sup>

Resource	Fife Pacific Highway	Fife Median	Fife I-5
Residence at 1309 62nd Avenue E	Use	Use	Use
Pick-Quick Drive In, 4306 Pacific Highway	Use	De minimis	No use
Cappa Park (planned)	De minimis	De minimis	De minimis

Notes:  
(1) Preliminary Section 4(f) use determinations apply with or without the 54th Avenue Design Option or 54th Span Design Option.





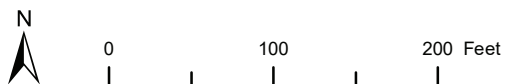
Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).

**FIGURE D-86**  
 Section 4(f) Use of Daffodil Motel  
 SF 99-West Alternative  
*Tacoma Dome Link Extension*





Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE D-87**  
 Section 4(f) Use of Daffodil Motel  
 SF 99-East Alternative  
 Tacoma Dome Link Extension

*Residence at 1309 62nd Avenue E*

All alternatives in the Fife Segment would require acquisition of the property located at 1309 62nd Avenue E and removal of the vacant residence. FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that the removal would be an adverse effect under Section 106 and would constitute the use of the Section 4(f) property. Figure D-88 illustrates this potential use.

*Pick-Quick Drive In*

The Fife Pacific Highway Alternative would require the removal of the Pick-Quick Drive In building and the permanent incorporation of the property at 4036 Pacific Highway East for transportation purposes. FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that removal of the building and associated signage would be an adverse effect under Section 106 and would constitute a Section 4(f) use. Figure D-89 illustrates the property with the Fife Pacific Highway Alternative.

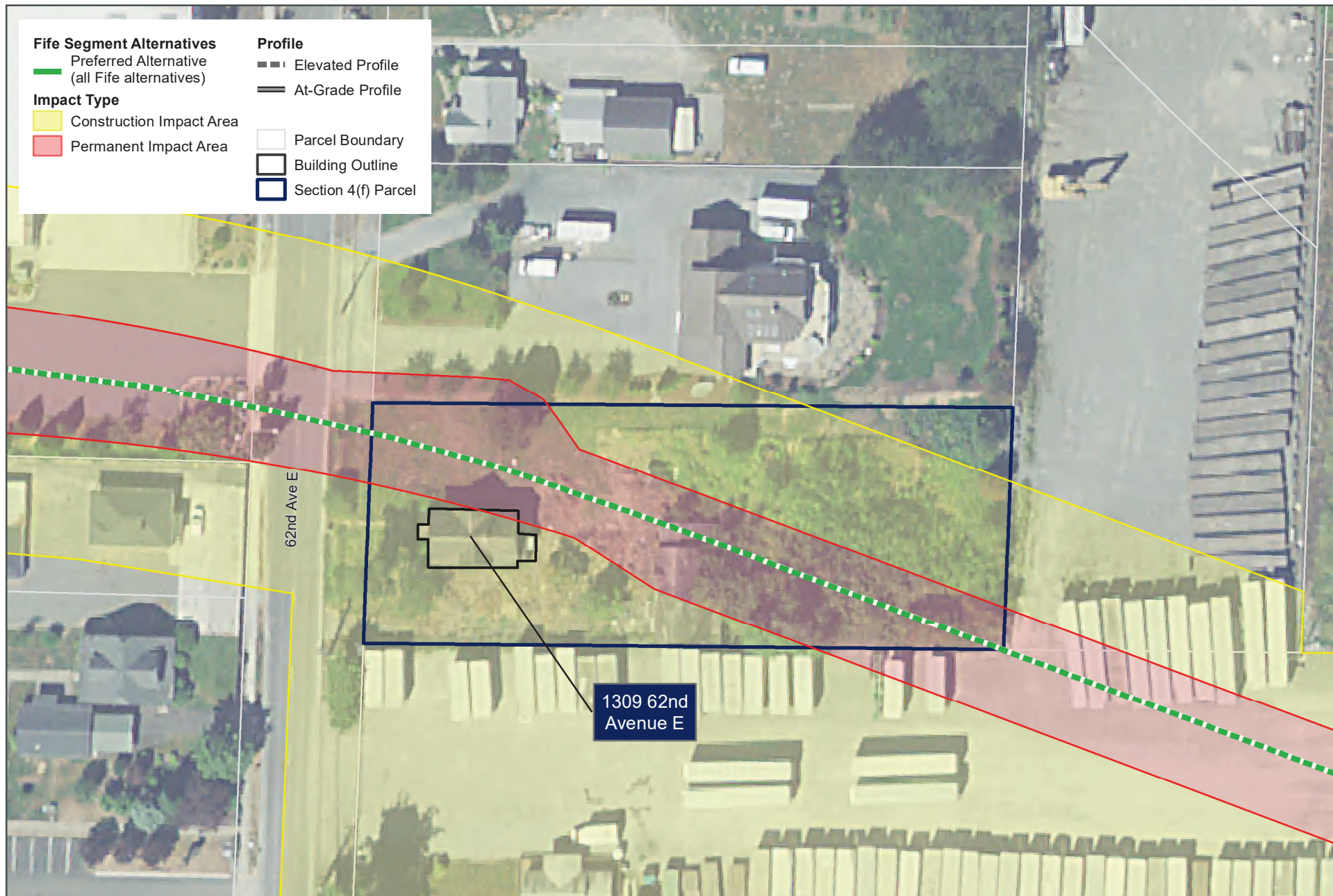
The Fife Pacific Highway Median Alternative (Fife Median Alternative) is farther from the Pick-Quick building and would not remove the building. It would acquire and permanently incorporate approximately 0.13 acre of the property to adjust the sidewalk and driveway entrance (as well as temporarily occupy 0.50 acre for construction), but this would not diminish the defining historic features, characteristics and attributes of the Pick-Quick, including its prominent location along Pacific Highway and its signage.

The Fife Median Alternative elevated guideway would be approximately 16 feet above the center lane of the Pacific Highway, leaving two lanes of east-bound traffic and a public sidewalk between the parcel and the new track. The height and distance of the light rail structure from the building would not screen the building from view, permanently incorporate the building or its surrounding parcel, or disrupt traditional transportation routes to and from Pacific Highway, thereby maintaining public access to the building. Additionally, Sound Transit would restore the landscaped areas disturbed as part of the project.

While the Fife Median Alternative would add an element to the building's setting, FTA has preliminarily determined that the effect would not be adverse, as the building's relationship with the air space above Pacific Highway is not a characteristic that qualifies it for listing in the NRHP. Given that the building, its sign, access, key features, and activities will remain, FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that the Fife Median Alternative would have no adverse effect under Section 106 (Figure D-90). As such, FTA has made a preliminary determination that it would qualify as a *de minimis* impact under Section 4(f), which will be finalized after Section 106 consultation.

The Fife I-5 Alternative would be more than a block to the rear of this property and along the border of I-5, away from Pacific Highway. Pick-Quick would be outside the construction footprint and would not result in permanent incorporation or temporary occupancy by the Fife I-5 Alternative. The Fife I-5 Alternative is far enough away that it would not impair Pick-Quick's setting, nor would its operations create potential proximity impacts of a magnitude that would constitute a constructive use.

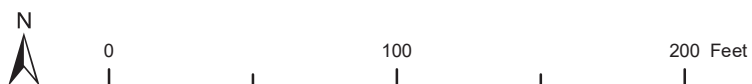




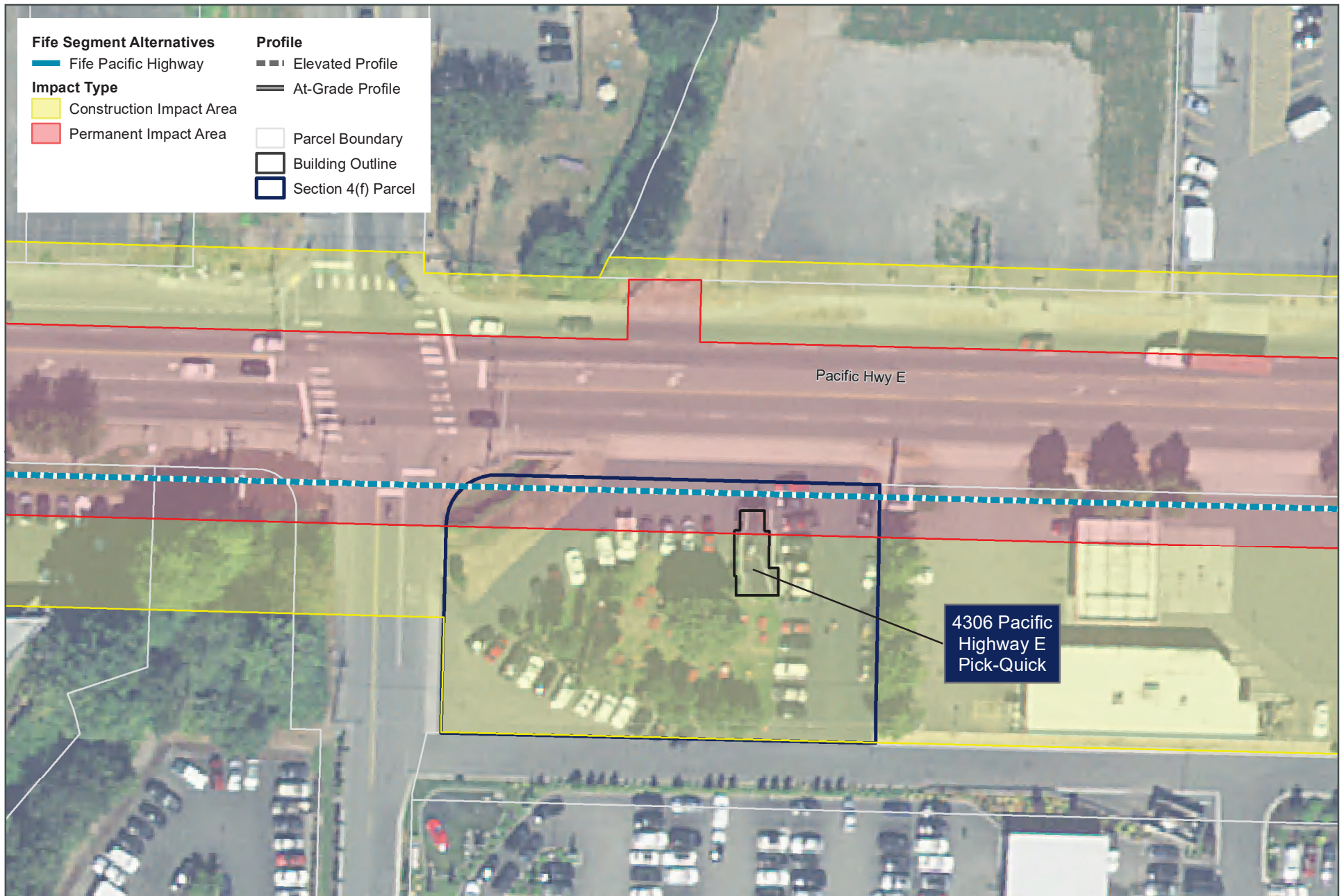
Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).

**FIGURE D-88**  
Section 4(f) Use of Residence at 1309 62nd Avenue E  
All Fife Alternatives

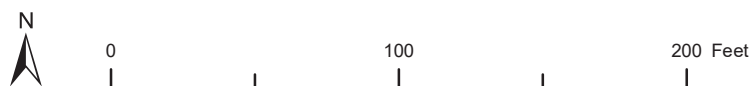
*Tacoma Dome Link Extension*





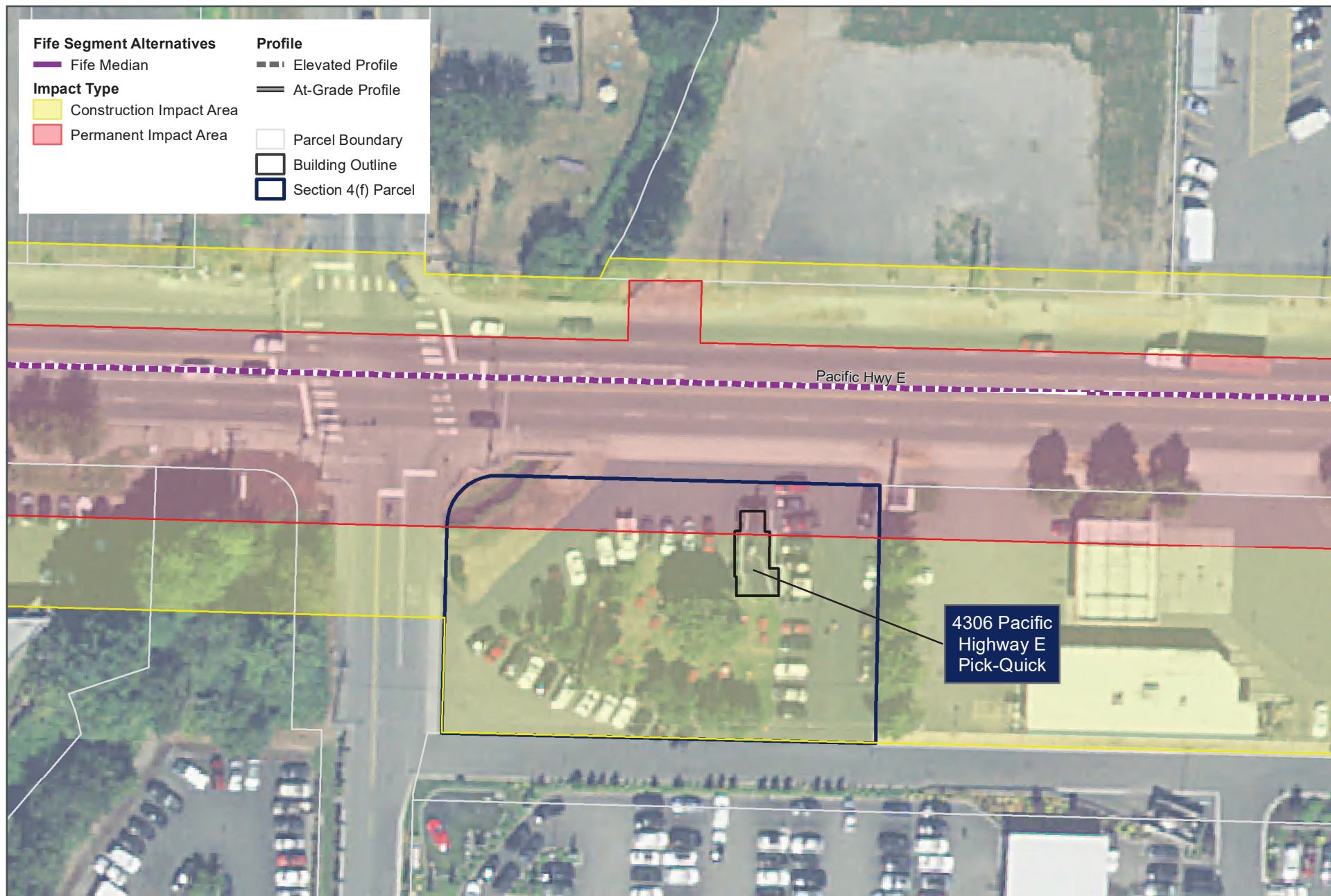


Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).

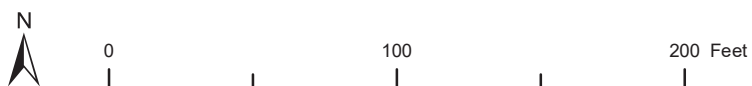


**FIGURE D-89**  
 Section 4(f) Use of Pick-Quick  
 Fife Pacific Highway Alternative  
 Tacoma Dome Link Extension





Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE D-90**  
 Section 4(f) Use of Pick-Quick  
 Fife Median Alternative  
*Tacoma Dome Link Extension*



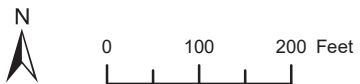
*Cappa Park (Planned)*

Cappa Park, which is planned to be constructed in the City of Fife, is on property that extends from I-5 to Pacific Highway E and is adjacent to all Fife Segment alternatives. Any of the alternatives in the Fife Segment would require partial acquisition of this property. However, all alternatives would be located adjacent to existing right-of-way, on the edge of the large, currently undeveloped property. Both the Fife Pacific Highway and Fife Median alternatives would permanently incorporate 0.15 acre, which is less than 4 percent of the total area to accommodate TDLE. The Fife I-5 Alternative would permanently incorporate 0.23 acre, which is less than 6 percent of the total area.

Both the Fife Pacific Highway and Fife Median alternatives would also temporarily occupy an additional 0.26 acre during construction adjacent to Pacific Highway, and the Fife I-5 Alternative would occupy an additional 0.34 acre during construction adjacent to I-5. The temporarily occupied area would be fully restored when construction is completed. If construction of Cappa Park is completed before implementation of TDLE, park and recreational use and access to the property would be maintained. No noise or vibration impacts would occur, given the existing noise impacts from I-5 and Pacific Highway E on either side of the proposed Cappa Park. The placement of columns and elevated guideway along the edge of the property would not substantially diminish the City's proposed activities, features, or attributes qualifying the planned park for protection under Section 4(f), so FTA has made a preliminary determination that it would qualify as a *de minimis* impact to the property. Figures D-91 to D-93 illustrate this potential *de minimis* impact.



Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).

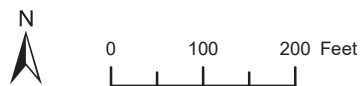


**FIGURE D-91**  
 Section 4(f) Use of Cappa Park  
 Fife Pacific Highway Alternative  
*Tacoma Dome Link Extension*





Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).

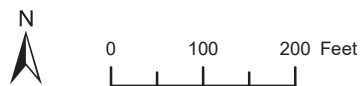


**FIGURE D-92**  
 Section 4(f) Use of Cappa Park  
 Fife Median Alternative  
*Tacoma Dome Link Extension*





Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE D-93**  
 Section 4(f) Use of Cappa Park  
 Fife I-5 Alternative  
*Tacoma Dome Link Extension*

## Tacoma Segment

No uses of Section 4(f) resources would have a greater than *de minimis* impact in the Tacoma Segment, as illustrated in Table D-7.

**Table D-7 Summary of Preliminary Section 4(f) Use Determinations by Alternative for the Tacoma Segment**

Resource	Tacoma 25th Street – West	Tacoma 25th Street – East	Tacoma Close to Sounder	Tacoma 26th Street
Milwaukee Railroad-Puyallup River Bridge, Tacoma	No use	No use	No use	No use
Milwaukee, St. Paul, and Pacific Railroad, Tacoma	No use	No use	No use	No use
Northern Pacific Railway/BNSF, Tacoma	No use	No use	No use	No use
Puyallup River Bridge (Pacific Highway E), Tacoma	No use	No use	No use	No use
E 21st Street Bridge (Lincoln Avenue), Tacoma	No use	No use	No use	No use
Puyallup River Levees	<i>De minimis</i>	<i>De minimis</i>	<i>De minimis</i>	<i>De minimis</i>
Engine House 4 – Tacoma Fire Station No. 4, 220-224 E 26th Street, Tacoma	No use	No use	No use	No use
Residence, 1320 E 26th Street, Tacoma	No use	No use	No use	No use
Residence, 1112 E 26th Street, Tacoma	No use	No use	No use	No use
Residence, 1106 E 26th Street, Tacoma	No use	No use	No use	No use
Commercial building, 603-605 Puyallup Avenue, Tacoma	No use	No use	No use	No use
Commercial building, 101 E 26th Street, Tacoma	No use	No use	No use	No use
Commercial building, 102 S 26th Street, Tacoma	No use	No use	No use	No use
Commercial building, 110 E 26th Street, Tacoma	No use	No use	No use	No use
Commercial building, 102 E 26th Street, Tacoma	No use	No use	No use	No use

### Historic Bridges

The three bridge crossings of the Puyallup River (Milwaukee Railroad Bridge, Puyallup River Bridge, and E 21st Street Bridge), which have been listed in or recommended eligible for listing in the NRHP, are located outside the construction footprint for all alternatives, would not be physically altered, and would not be subject to proximity impacts of a magnitude that would constitute a constructive use. FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that none of the alternatives would adversely affect the bridges under Section 106 and would not constitute a Section 4(f) use.

### Puyallup River Levees

Both the long-span and pier-supported bridge options for TDLE would require columns to be placed in the Puyallup River Levees to support the spans crossing the river, and some ground



improvements may be needed within and below the levee around those columns to address potential seismic hazards. In some instances, TDLE may also require a modification to the levee access road. Excavation within the levee would be required during construction of the new columns and temporary closure or detour of the levee access road would be required, but the access road is not considered a contributing feature of the historic resource. As a result, the levees may be temporarily occupied during construction, but TDLE would not substantially impair the features or attributes that qualify them for listing in the NRHP. Therefore, FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that the levees would not be adversely affected under Section 106. As such, FTA has preliminarily determined that they would qualify as a *de minimis* impact under Section 4(f) for all alternatives, which will be finalized after Section 106 consultation.

#### *Northern Pacific Railway/BNSF*

The Northern Pacific Railway/BNSF crosses under all alternatives in the Tacoma Segment, west of the proposed Puyallup River Crossing. The rail corridor may be temporarily occupied during construction over the river, but construction activities would be temporary; would not physically alter or use the railway; would not interfere with the protected activities, features, or attributes of the property; and would be fully restored to a condition that is at least as good as its condition prior to the project. FTA is consulting with SHPO and anticipates concurrence that this temporary occupancy meets the criteria in 23 CFR 774.13(d). Therefore, FTA has made a preliminary determination that there will be no Section 4(f) use of the railway. After the issuance and public comment on the Draft EIS, FTA will request final concurrence in writing by the SHPO.

#### *Engine House 4 – Tacoma Fire Station No. 4*

With the Tacoma 26th Street Alternative, the TDLE guideway would be more than 60 feet above Engine House 4, which would be south of the guideway along E 26th Street. TDLE would not physically impact Engine House 4 but would be nearby. Pursuant to Section 106, FTA has preliminarily determined that the Tacoma 26th Street Alternative would not adversely affect Engine House 4, because, based on the proposed plans, the guideway would be located 16 feet away and four stories above Engine House 4 and would not adversely affect the characteristics that qualify it for listing in the NRHP, such as its architecture typical of an early 20th-century fire station. During construction, the building would be protected, access would be maintained, and no physical alteration to the property would occur. FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has made the preliminary determination that there will be no adverse effect under Section 106 and no Section 4(f) use of Engine House 4, which will be finalized after Section 106 consultation.

No Section 4(f) use would occur for the Preferred Tacoma 25th Street-West, Tacoma 25th Street-East, or Tacoma Close to Sounder alternatives.

#### *Remaining Historic Resources*

The remaining historic properties in the TDLE study area (1320 E 26th Street, 1112 E 26th Street, 1106 E 26th Street, 1102 Puyallup Avenue, 603-605 Puyallup Avenue, 101 E 26th Street, 110 E 26th Street, 102 E 26th Street) are all recommended NRHP eligible, but FTA has preliminarily determined no adverse effect under Section 106 is anticipated because they are all located outside the construction footprint for all alternatives and would not be physically altered or otherwise impaired by ongoing operations. FTA, in consultation with the SHPO (the official with jurisdiction over the resource), has preliminarily determined that none of the alternatives would have an adverse effect under Section 106 or result in a Section 4(f) use, which will be finalized after 106 consultation.

## 5 SECTION 4(F) AVOIDANCE ALTERNATIVES ANALYSIS

Unless the use of a Section 4(f) property is determined to have a *de minimis* impact, FTA is required to consider whether there are feasible and prudent alternatives that would avoid the use and whether the project includes all possible planning to minimize harm. The Section 4(f) regulations define a feasible alternative as an alternative that could be built as a matter of sound engineering judgment.

A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. The *Section 4(f) Policy Paper* (USDOT 2012) provides guidance on determining whether there are feasible and prudent avoidance alternatives and is the basis of this analysis.

Along with the No-Build Alternative, potential alternatives to avoid the individual use of Section 4(f) property must be considered and may include the following types of avoidance alternatives:

- **Location Alternative.** A location alternative refers to the rerouting of the entire project along a different alignment.
- **Alternative Actions.** An alternative action could be a different mode of transportation, such as rail transit or bus service, or some other action that does not involve construction, such as the implementation of transportation management systems or similar measures.
- **alignment to avoid a specific resource.**
- **Design Changes.** A design change is a modification of the proposed design in a manner that would avoid impacts, such as reducing the planned median width, building a retaining wall, or incorporating design exceptions.

In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.

An alternative is not prudent if:

- (i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
- (ii) It results in unacceptable safety or operational problems;
- (iii) After reasonable mitigation, it still causes:
  - (A) Severe social, economic, or environmental impacts;
  - (B) Severe disruption to established communities;
  - (C) Severe disproportionate impacts to minority or low income populations; or
  - (D) Severe impacts to environmental resources protected under other Federal statutes;
- (iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;

- (v) It causes other unique problems or unusual factors; or
- (vi) It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude. (23 CFR 774.17)

All of the TDLE alternatives would use at least one Section 4(f) resource in the South Federal Way Segment and another in the Fife Segment. The following analysis considers whether there are any feasible and prudent alternatives that would avoid the use of Section 4(f) resources. Avoidance alternatives based on alignment shifts or design changes were constrained by requirements unique to light rail, such as maximum grade, minimum curve radius, need for station locations to be on a straight section of track, and typical column spacing for elevated guideway. Avoidance alternatives were also limited to those that met the project's purpose and need, including location within or adjacent to existing right-of-way to minimize impacts to promote a healthy environment and economy by minimizing adverse impacts on the natural, built, and social environments

## 5.1 No-Build Alternative

The No-Build Alternative includes all existing and committed transportation infrastructure, facilities, and services contained in the region's fiscally constrained and federally approved Regional Transportation Plan (Puget Sound Regional Council 2018b) as well as the Sound Transit 3 Plan (Sound Transit 2016). The No-Build Alternative would avoid use of all Section 4(f) resources that would experience a use by TDLE. Although the No-Build Alternative is feasible, since no construction would be required to implement the alternative, it is not prudent because it would not support the purpose and need of the project (as described in Sections 2.2 and 2.3). Under 23 CFR 773.17, the No-Build "compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need."

## 5.2 Alternative Actions

The purpose and need for TDLE is to expand the existing Link light rail system from Federal Way Downtown Station to the Tacoma Dome Station to, among other things, address chronic roadway congestion, and implement regional and local long-range plans. Because the purpose of TDLE is to expand the existing light rail system, no alternative actions such as buses, highway improvements, etc. would meet the purpose and need and were not considered.

## 5.3 Locational Alternatives and Alignment Shifts

During the alternatives screening and evaluation for TDLE leading up to the identification of alternatives to be evaluated in the Draft EIS, FTA and Sound Transit considered a wide range of potential alternatives, including different route alignments and station locations.

As described in Tables D-5 and D-6 and illustrated on Figure D-94, D-95, and D-96, there is no prudent and feasible alternative that avoids all Section 4(f) property. The primary factors affecting the prudence of avoidance alternatives include:

- Impacts to properties of the Puyallup Tribe of Indians, which are protected by treaty rights.
- Impacts to wetlands in the South Federal Way Segment.
- Scale of acquisitions and displacement required.

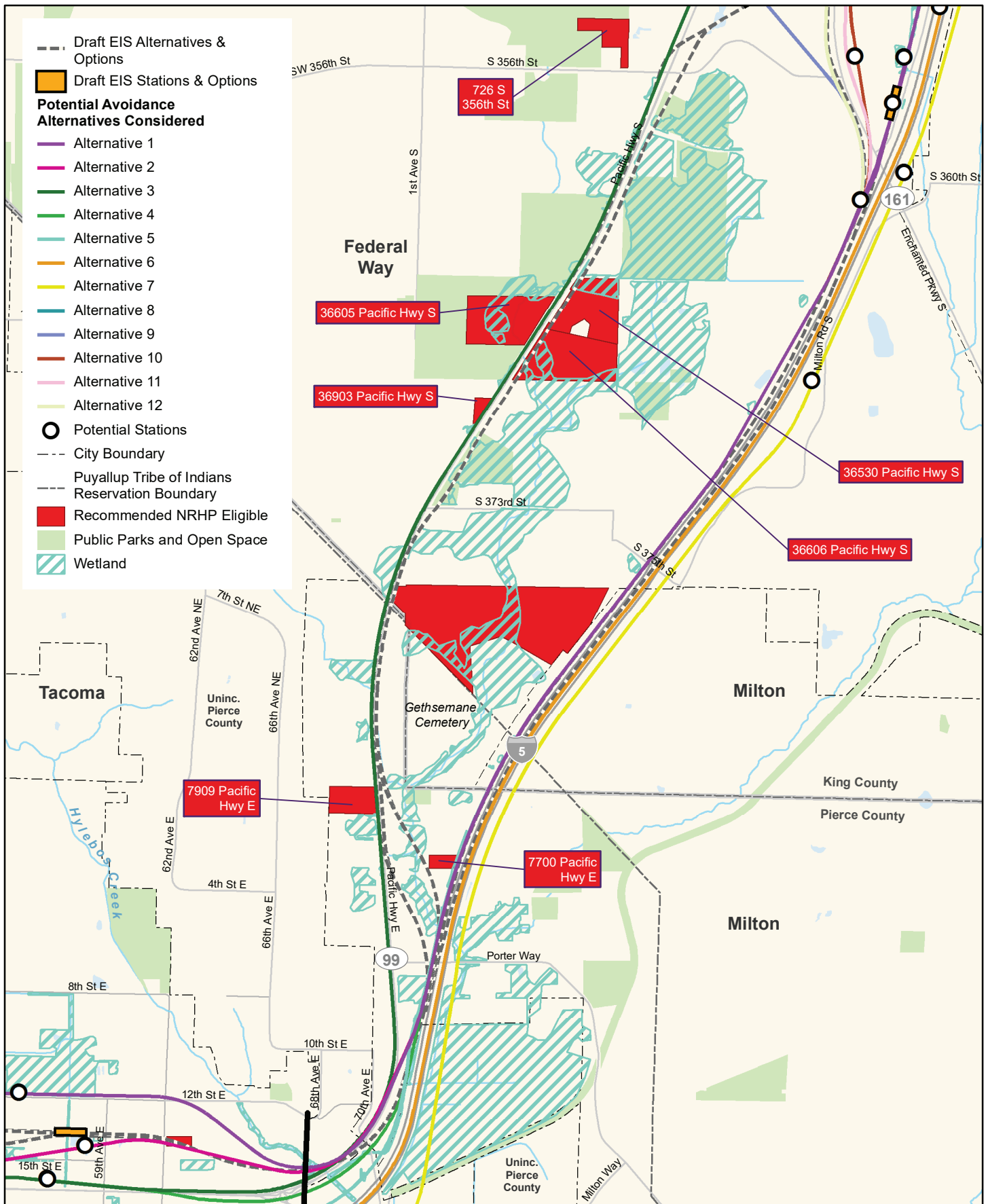
- Cost, construction, and operational challenges associated with additional crossings of I-5.
- Conflicts with the SR 167 interchange project, which is a federally approved project that is already advancing toward construction and implementation.
- Avoidance of the St. Paul Chong Hasang Parish campus beyond priest housing, including neighboring low-income senior housing.
- Conflicts with WSDOT plans to add direct connector ramps, in addition to existing space constraints in I-5 corridor.
- Physical impediments, such as the topography near the Fife curve.
- Conflicts with WSDOT plans to restore and rehabilitate Hybelos Creek.

### South Federal Way Segment

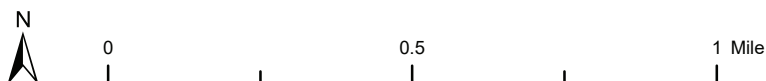
Alignment alternatives in the South Federal Way Segment are shown on Figure D-94. Those alternatives were developed during the alternatives development process and are all generally located along one of the two existing transportation corridors, I-5 and SR 99 (Pacific Highway). Alternatives located outside of those existing transportation corridors were eliminated early on in alternatives screening due to the magnitude of difference in impacts that would result from locating TDLE in a third corridor, including the increase in acquisitions needed; impacts to critical areas, particularly wetlands; changes to land use; and more. As a result, other locational alternatives or alignment shifts outside of the I-5 and SR 99 corridors are not feasible or prudent.

The SF 99-East and SF 99-West alternatives would both use a portion of the Section 4(f) resource at 36530A Pacific Highway S (the K.C.J. Stables). Locating the alignment in the median of SR 99 near this resource would not avoid the Section 4(f) use because a portion of the property would still be used for roadway widening, so would not constitute a prudent and feasible avoidance alternative. The SF Enchanted Parkway and SF I-5 alternatives would avoid use of the resource at 36530A Pacific Highway S; however, those alternatives would use a portion of the Section 4(f) resource, Site 45K11586, associated with St. George's Indian School.

Although potentially feasible, any alternative to the east of I-5, illustrated as Alternatives 6 and 7 on Figure D-94, is not prudent because it would result in additional construction, maintenance, or operational challenges based on the need for extra crossings of I-5. These extra crossings would be significantly more expensive to construct and maintain, would have high utility conflicts, and would have the potential need to widen I-5 for additional right-of way to make room for columns. In addition, construction within the I-5 right-of-way would pose logistical and safety challenges as well as significant traffic impacts, including temporary closures of I-5. Alternatives 6 and 7 would also require crossing a critical aquifer recharge area on the east side of I-5. Alternative 7, which is farther to the east of I-5, would conflict with both existing and planned portions of the Interurban Trail at several locations and would require significantly more acquisitions and displacement. Additional analysis regarding the prudence of avoidance alternatives to the east of I-5 are included in Table D-8. Based on this assessment, no feasible and prudent avoidance alternatives have been identified.



Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE D-94**  
**Potential Avoidance Alternatives Considered**  
**South Federal Way Segment**  
*Tacoma Dome Link Extension*



**Table D-8 Potential Avoidance Alternatives Evaluation of Prudence Criterion for South Federal Way Segment**

Prudence Criterion (23 CFR 774.17)	No-Build Alternative	Potential Avoidance Alternatives East of I-5 (Alternatives 6 and 7 on Figure D-94)
(i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need	The No-Build Alternative would fail to provide high-quality, rapid, reliable, and efficient light rail transit to communities in the project corridor, inconsistent with the Sound Transit 3 Plan; it would not meet projected travel demand; it would not connect the communities of Federal Way, Milton, Fife, Tacoma, and the Puyallup Tribe of Indians to regional centers and destinations on the regional high-capacity transit system; it would not expand mobility for the corridor and region's residents, including transit-dependent, low-income, and minority populations; and it would not encourage transit oriented development.	Generally consistent with Purpose and Need.
(ii) It results in unacceptable safety or operational problems	No unique safety or operational problems.	Crossing I-5 twice within a short distance would require lower speeds through the South Federal Way Segment, increasing overall travel time.
(iii) After reasonable mitigation it still causes: (A) Severe social, economic, or environmental impacts; (B) Severe disruption to established communities; (C) Severe disproportionate impacts to minority or low income populations; or (D) Severe impacts to environmental resources protected under other Federal statutes	No.	Potential impacts to the culturally sensitive resources associated with St. George's Cemetery would be anticipated even on the east side of I-5. The east of I-5 alternatives would also cause much more displacement through the acquisition of new right-of-way on either side of I-5.  Traffic impacts during construction would be much greater, requiring temporary closure of I-5 and the use of detour routes through adjacent communities that are not suited to the high volume of traffic that typically utilizes I-5. These impacts would be repeated when closure is required for maintenance or repair of the elevated guideways over I-5.
(iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude	No.	Construction costs would increase for alternatives east of I-5 due to the need for additional acquisition of right-of-way and the added cost of two new elevated structures crossing I-5. Maintenance would be more challenging and costly due to the need for I-5 closure during maintenance activity.
(v) It causes other unique problems or unusual factors	No.	Would be technically challenging to design and operate an alternative east of I-5 that is able to cross back to the west side in advance of the Fife Curve; would require a long span over I-5 due to the width of I-5 and skew of the crossings.
(vi) It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.	No.	Avoidance alternatives east of I-5 would be unlikely to avoid the culturally sensitive properties associated with St. George's Cemetery, would be more expensive to construct and operate, would have major traffic impacts to the region and adjacent communities, and would not support desired travel speeds.

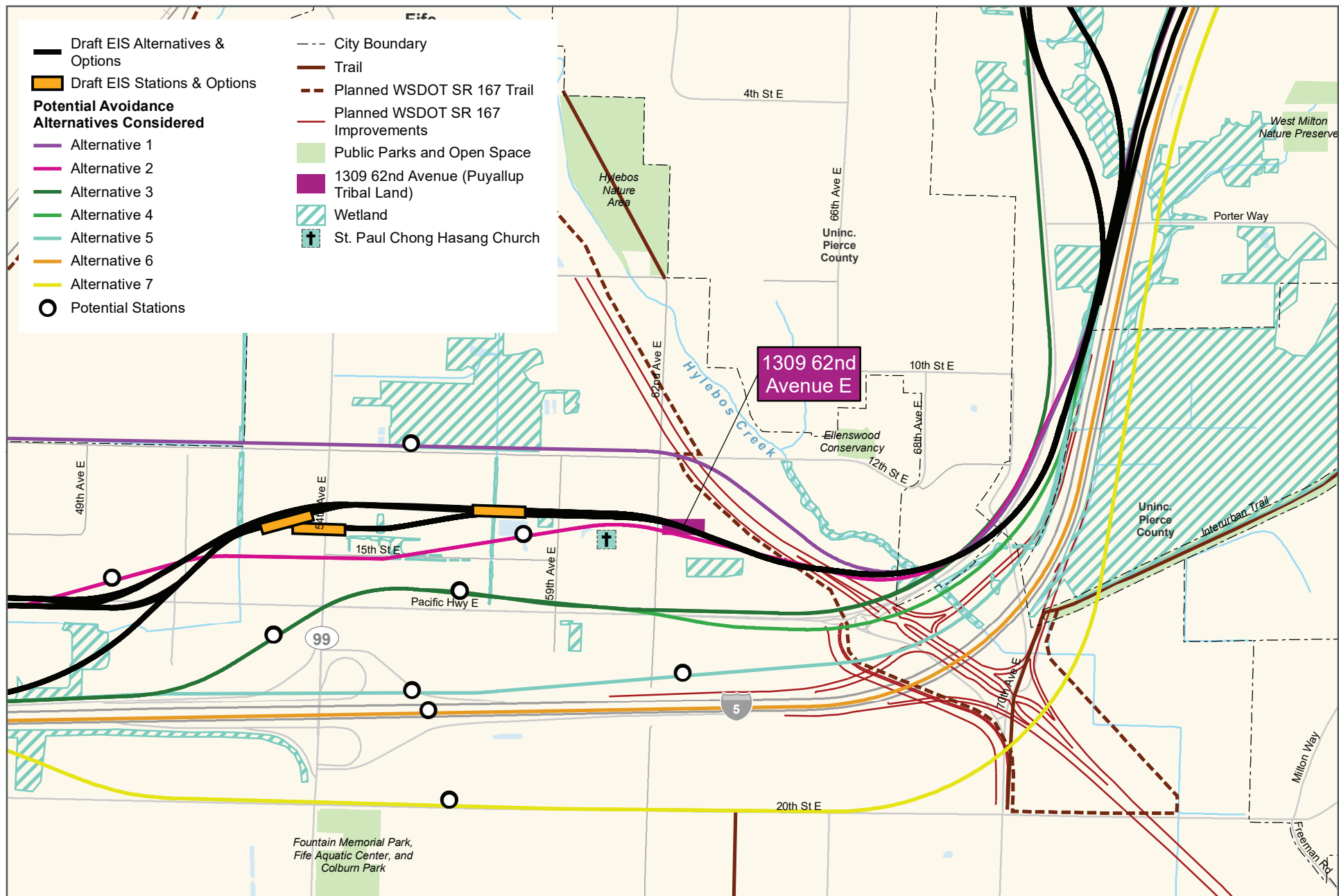
## **Fife Segment**

In Fife, where the Section 4(f) property at 1309 62nd Avenue E is located, at least eight potential avoidance alternatives, in addition to the No-Build Alternative, were evaluated. Seven of the potential avoidance alternatives are shown in Figure D-95. The Potential Avoidance Tunnel Alternative is shown on Figure D-96. A summary of the analysis of all the potential avoidance alternatives is included in Table D-9.

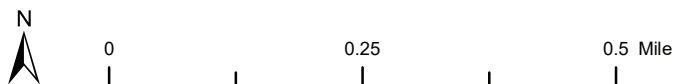
While these potential avoidance alternatives are feasible because they technically could be built as a matter of sound engineering judgment, they would not be considered prudent for the reasons presented in Table D-9.

## **5.4 Design Changes**

Sound Transit continues to look for opportunities to reduce project impacts, including the use of Section 4(f) resources. Information on property-specific design changes to minimize impacts that were incorporated into the alternative design are discussed further in Section 6, Measures to Minimize Harm.

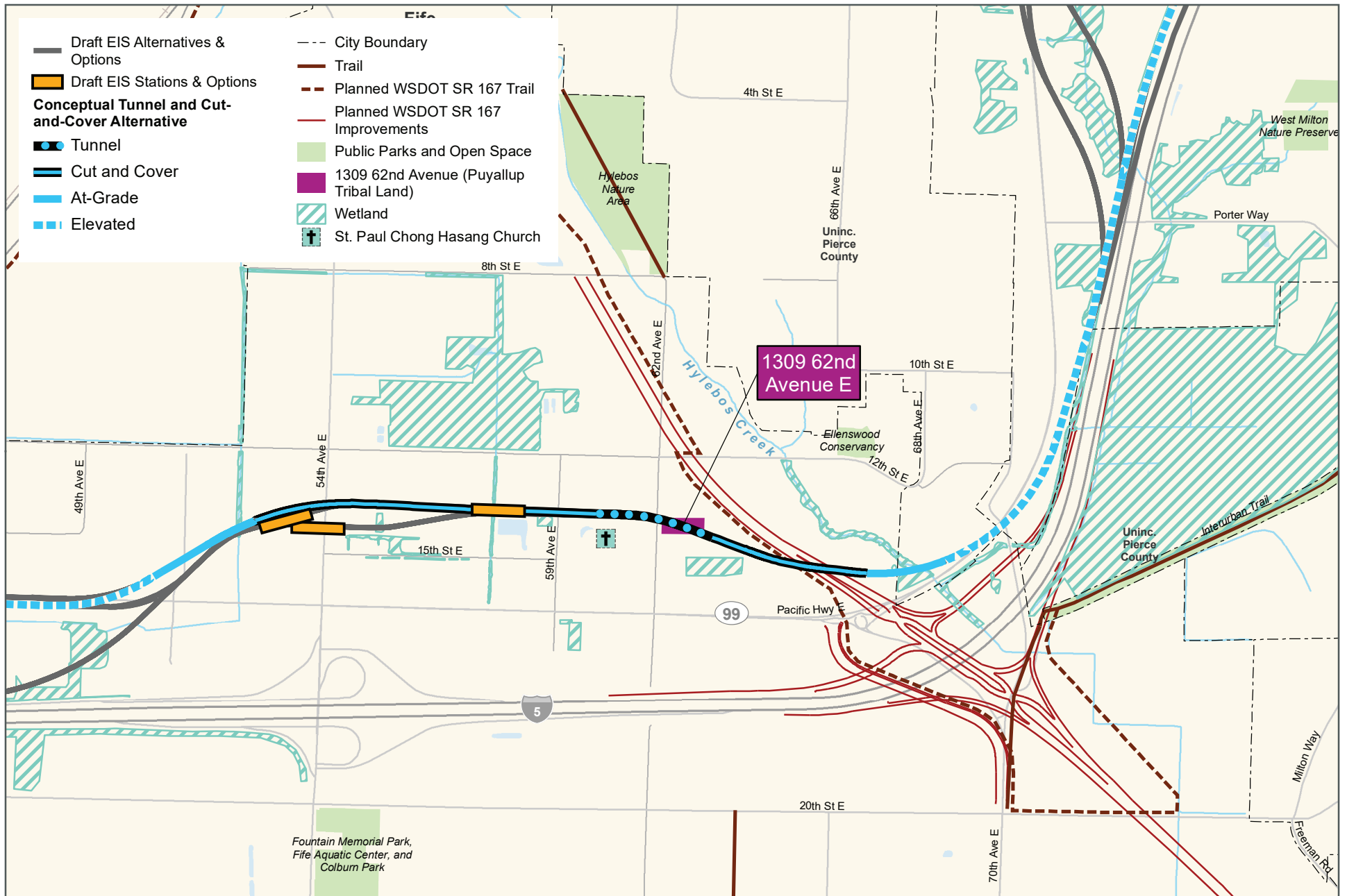


Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).

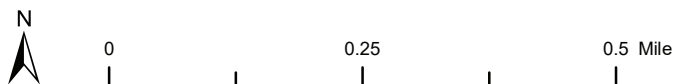


**FIGURE D-95**  
Potential Avoidance Alternatives Considered  
Fife Segment

Tacoma Dome Link Extension



Data Sources: PSRC, King and Pierce County, Cities of Edgewood, Federal Way, Fife, Milton, Tacoma (2023).



**FIGURE D-96**  
 Potential Avoidance Tunnel Alternative  
 Fife Segment  
 Tacoma Dome Link Extension

Table D-9 Potential Avoidance Alternatives Evaluation of Prudence Criterion for Fife Segment (Residence at 1309 62nd Avenue E)

Prudence Criterion (23 CFR 774.17)	No-Build Alternative	Potential Avoidance Alternative 1	Potential Avoidance Alternative 2	Potential Avoidance Alternative 3	Potential Avoidance Alternative 4	Potential Avoidance Alternative 5	Potential Avoidance Alternative 6	Potential Avoidance Alternative 7	Potential Avoidance Tunnel Alternative
(i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need	The No-Build Alternative would fail to provide high-quality, rapid reliable and efficient light rail transit to communities in the project corridor, inconsistent with the Sound Transit 3 Plan; it would not meet projected travel demand; it would not connect the communities of Federal Way, Milton, Fife, Tacoma, and the Puyallup Tribe of Indians to regional centers and destinations on the regional high-capacity transit system; it would not expand mobility for the corridor and region's residents, including transit-dependent, low-income, and minority populations; and it would not encourage TOD.	Generally consistent with Purpose and Need.	Generally consistent with Purpose and Need.	Generally consistent with Purpose and Need.	Generally consistent with Purpose and Need.	Generally consistent with Purpose and Need.	Generally consistent with Purpose and Need.	Generally consistent with Purpose and Need.	Generally consistent with Purpose and Need.
(ii) It results in unacceptable safety or operational problems	No unique safety or operational problems.	Over 0.3 mile from nearest existing transit stop and would not support desired travel speeds; unacceptable operational problems.	Would not support desired travel speeds; unacceptable operational problem.	No unique safety or operational problems.	No unique safety or operational problems.	No unique safety or operational problems.	Would be restricted by FHWA limitations on the use of I-5 right-of-way, including severe space constraints and conflicts with anticipated future WSDOT projects related to maintaining safe and effective operations on I-5; unacceptable safety and operational problems.	No unique safety or operational problems.	Would require the Fife Station to be located underground; unacceptable operational problem.
(iii) After reasonable mitigation it still causes: (A) Severe social, economic, or environmental impacts; (B) Severe disruption to established communities; (C) Severe disproportionate impacts to minority or low income populations; or (D) Severe impacts to environmental resources protected under other Federal statutes	No.	Locating the new light rail corridor outside of the Fife City Center and away from existing East/West thoroughfares (SR 99 and I-5) would cause community disruption, including noise and visual impacts to additional residences and Tribal properties in Fife.  Potential Avoidance Alternative 1 would also conflict with WSDOT's extensive Riparian Restoration and Hylebos Creek realignment project.	Would require at least partial acquisition and removal of the St. Paul Chong Hasang Church and disrupt the remainder of its campus; would also displace low-income senior apartments, Rainier View Apartments.	High impact to low-income senior housing complex (Rainier View Apartments) and the greatest property impacts of all the alternatives evaluated	High impact to low-income senior housing complex (Rainier View Apartments) and the greatest property impacts of all the alternatives evaluated.	High impacts to Hylebos Creek and Puyallup Tribe of Indians trust property and business (the Emerald Queen Casino).	Major traffic congestion impacts during work on or near I-5.	Requires high number of property acquisition and disturbance through farmlands, wetlands, and floodplains.	The Potential Avoidance Tunnel Alternative would require large portals at either end, and portal excavations would require a large amount of disturbance to achieve the necessary grade for light rail vehicles. The impact of those tunnel portals would be borne by properties and/or infrastructure adjacent to the corridor, causing a severe impact to the property owners and established communities.  Additional impacts to property along the tunnel alignment would result from the installation of emergency egress locations, ventilation facilities, and access to the underground station.  The portal excavation would present a massive, deep barrier to pedestrians and would create additional safety and access concerns for nonmotorized traffic.  Duration of construction would also be much longer, increasing impacts and delaying transportation benefits.
(iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude	No.	No additional costs of an extraordinary magnitude have been identified.	No additional costs of an extraordinary magnitude have been identified.	No additional costs of an extraordinary magnitude have been identified.	No additional costs of an extraordinary magnitude have been identified.	No additional costs of an extraordinary magnitude have been identified.	No additional costs of an extraordinary magnitude have been identified.	No additional costs of an extraordinary magnitude have been identified.	Likely to have substantially larger construction, maintenance, or operational costs; may be technically infeasible.



Table D-9 Potential Avoidance Alternatives Evaluation of Prudence Criterion for Fife Segment (Residence at 1309 62nd Avenue E) (continued)

Prudence Criterion (23 CFR 774.17)	No-Build Alternative	Potential Avoidance Alternative 1	Potential Avoidance Alternative 2	Potential Avoidance Alternative 3	Potential Avoidance Alternative 4	Potential Avoidance Alternative 5	Potential Avoidance Alternative 6	Potential Avoidance Alternative 7	Potential Avoidance Tunnel Alternative
(v) It causes other unique problems or unusual factors	No.	<p>Would require a lease of property owned by the Puyallup Tribe of Indians, located just east of 1309 62nd Avenue E.</p> <p>Would increase travel time, reduce ridership, and lacks opportunity for transit oriented development in Fife.</p> <p>Would be located outside of the Fife City Center, inconsistent with adopted regional and local land use, transportation, and economic development plans and Sound Transit's Regional Transit Long-Range Plan.</p>	May still impact Section 4(f) property, although potentially <i>de minimis</i> .	<p>Potential Avoidance Alternative 3 would have major construction conflicts due to the WSDOT SR 167 improvement project and future proposed WSDOT direct connections at this interchange.</p> <p>Serves an SR 99 alignment from South Federal Way which was eliminated in earlier alternatives evaluations.</p> <p>Would cross property owned by the Puyallup Tribe of Indians.</p>	<p>Potential Avoidance Alternative 4 would have major construction conflicts due to the WSDOT SR 167 improvement project and future proposed WSDOT direct connections at this interchange.</p> <p>This alignment also would place columns in WSDOT's proposed re-aligned Hylebos Creek.</p> <p>High potential impacts to freight movement.</p> <p>Would cross property owned by the Puyallup Tribe of Indians.</p>	<p>Potential Avoidance Alternative 5 has a major impact to future WSDOT proposed direct connections at the SR 167 interchange; the TDLE alignment would likely need to be extremely tall to not preclude the construction of future ramps, which would result in increased costs and design challenges.</p> <p>Requires high-complexity property impacts, impacts on Tribal parcels, and coordination with the SR 167 project and 54th Street Interchange project.</p> <p>Would cross property owned by the Puyallup Tribe of Indians.</p>	<p>Would require widening and modification to I-5, resulting in higher construction impacts, including additional road closure and the associated traffic impacts.</p> <p>Construction within the I-5 right of way would pose logistical and safety challenges. Utility conflicts would also be high.</p>	<p>Would be located adjacent to Fountain Memorial Park, Fife Aquatic Center and Colburn Park, which could result in a <i>de minimis</i> impact.</p> <p>Requires an additional crossing of I-5 to the north or south, which would have high construction impacts, including additional closures of I-5 and other major roadways and associated traffic impacts.</p> <p>Would have major construction conflicts due to the WSDOT SR 167 improvement project and future proposed WSDOT direct connections at this interchange.</p>	Would be technically challenging given the high water table, potential conflicts with the SR 167 Improvement project and proposed WSDOT direct connections at this interchange.
(vi) It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.	No.	Impact to Puyallup Tribe of Indians trust property, high cost, disruption to residential areas outside the Fife City Center, conflicts with other projects in the project area, and would not support desired travel speeds.	Would not support desired travel speeds, impact to minority-serving St. Paul Chong Hasang Church and low-income senior apartments, Rainier View Apartments.	High property impacts, including to low-income senior apartments, Rainier View Apartments; impact to Puyallup Tribe of Indians trust property; Conflicts with SR 167 improvement project and future WSDOT connections; high cost.	Major construction limitations due to the WSDOT SR 167 improvement project and future WSDOT connections; impact to Puyallup Tribe of Indians trust property; high impact to low-income senior housing complex (Rainier View Apartments) and the greatest property impacts of all the alternatives evaluated.	Conflict with Puyallup Tribe of Indians trust property, conflicts with the SR 167 improvement project and future WSDOT connections.	Major construction and temporary traffic impacts; severe space constraints on I-5.	High property impacts and disturbance through farmlands, wetlands, and floodplains and additional conflicts with existing and planned facilities.	Unacceptable operational problems related to an underground station, high property impacts, long duration of construction, the creation of a barrier to pedestrian travel, higher costs, and technical construction challenges.

Notes:  
FHWA – Federal Highway Administration; I-5 – Interstate 5; TOD – transit oriented development; SR – State Route; WSDOT – Washington State Department of Transportation

## 6 MEASURES TO MINIMIZE HARM

Section 4(f) also requires the consideration of measures to minimize harm to Section 4(f) resources. If there is no alternative that avoids all Section 4(f) use, the alternative with the least overall harm may be approved, but only if it includes all possible planning to mitigate harm to Section 4(f) property (23 CFR 774.3(c)). Section 4(f) requires the consideration and documentation of all possible planning to minimize harm to that property. All possible planning means “that all reasonable measures identified in the Section 4(f) evaluation to minimize harm or mitigate for adverse impacts and effects must be included in the project” (23 CFR 774.17). The proposed action includes all possible planning to minimize harm from such use.

Reasonable measures to minimize harm would preserve the characteristics that qualify a property for inclusion in the NHRP and would result in no adverse effects to a historic property as defined in 36 CFR 800.5(b). Reasonable measures to mitigate harm would resolve adverse effects as described in 36 CFR 800.6. Minimization of harm may include both alternative design modifications that reduce the amount of Section 4(f) property used and mitigation measures that compensate for residual impacts. The reasonableness of the measure is based on the preservation purpose of the statute, the views of the official(s) with jurisdiction over the Section 4(f) property, whether the cost of the measure is a reasonable public expenditure in light of the adverse impacts, and the impacts or benefits of the measure to communities or environmental resources outside of the Section 4(f) property (23 CFR 774.17).

If archaeological sites are encountered, FTA and Sound Transit would consult with the SHPO, affected Tribes, and other consulting parties about eligibility for listing in the NRHP, project effects, necessary mitigation, or other treatment measures. Examples of mitigation measures include, but are not limited to, modifying the undertaking through redesign, reorientation or other similar changes, implementing data recovery of archaeological information and materials, preparing a National Register nomination for an archaeological site, and preparing an ethnographic study. An archaeological resources monitoring and treatment plan and unanticipated discovery plan would be prepared to guide archaeological monitoring work before and during construction.

For TDLE, Sound Transit has designed alternatives that follow existing transportation corridors to the extent possible, to avoid or minimize use of Section 4(f) Resources. Potential proposed mitigation measures are identified in Table D-10 and would be confirmed and documented in a programmatic agreement or memorandum of agreement, in consultation with the SHPO, Tribes, and additional consulting parties.

**Table D-10 Proposed Measures to Minimize Harm to Section 4(f) Resources**

4(f) Resource	Impacts	Potential Measures to Minimize Harm	Associated Alternative	Section 4(f) Use Assessment
<b>South Federal Way Segment</b>				
Montessori Academy at Spring Valley, 36605 Pacific Highway S	<b>Permanent:</b> Partial acquisition, new elevated track nearby, potential removal of mature foliage  <b>Temporary occupancy:</b> Construction impacts	<b>Permanent:</b> Preparing additional documentation or interpretation for the resources, designing/installing an interpretive/educational display or exhibit, or preparing an NRHP nomination.  <b>Temporary:</b> <ul style="list-style-type: none"> <li>Typical BMPs to minimize and avoid construction impacts, such as dust or noise, would be applied</li> <li>Restore disturbed areas following construction</li> <li>Access maintained to school</li> </ul>	SF 99-West Alternative with or without the Porter Way Design Option	Use
Residence and Stables at 36530A Pacific Highway S	<b>Permanent:</b> Partial acquisition and potential removal of screening trees; for SF 99-East Alternative, would also include demolition of a ca.1977 outbuilding  <b>Temporary occupancy:</b> Construction impacts	<b>Permanent:</b> Potential mitigation measures could include preparing additional documentation or interpretation for the resources, designing/installing an interpretive/educational display or exhibit, or preparing an NRHP nomination.  <b>Temporary:</b> <ul style="list-style-type: none"> <li>Typical BMPs to minimize and avoid construction impacts, such as dust or noise, would be applied</li> <li>Restore disturbed areas following construction</li> <li>Access maintained to property</li> </ul>	SF 99-East Alternative and SF 99-West Alternative, with or without the Porter Way Design Option	Use
Residence at 36606 Pacific Highway S	<b>Permanent:</b> New elevated track nearby and potential removal of screening trees  <b>Temporary occupancy:</b> Construction impacts	<b>Permanent:</b> Potential mitigation measures could include the restoration of screening trees.  <b>Temporary:</b> <ul style="list-style-type: none"> <li>Typical BMPs to minimize and avoid construction impacts, such as dust or noise, would be applied</li> <li>Restore disturbed areas following construction</li> <li>Access maintained to property</li> </ul>	SF 99-East Alternative with or without the Porter Way Design Option	Use
Residence at 36903 Pacific Highway S	<b>Permanent:</b> Demolition of NRHP-eligible building	<b>Permanent:</b> Potential mitigation measures could include an interpretive display on or near the property, or documentation under the Historic American Buildings Survey/Historic American Engineering Record.	SF 99-West Alternative with or without the Porter Way Design Option	Use
Site 45K101586	<b>Permanent:</b> Ground disturbing activity within archaeological site  <b>Temporary occupancy:</b> Construction impacts	<b>Permanent:</b> Potential mitigation measures could include protection in place, data recovery, or other measures.  <b>Temporary:</b> <ul style="list-style-type: none"> <li>Typical BMPs to minimize and avoid construction impacts, such as dust or noise, would be applied</li> <li>Restore disturbed areas following construction</li> </ul>	Enchanted Parkway and SF I-5 alternatives	Use

**Table D-10 Proposed Measures to Minimize Harm to Section 4(f) Resources  
(continued)**

4(f) Resource	Impacts	Potential Measures to Minimize Harm	Associated Alternative	Section 4(f) Use Assessment
Daffodil Motel at 7909 Pacific Highway E	<p><b>Permanent:</b> Partial acquisition and demolition or relocation of signage along the highway</p> <p><b>Temporary occupancy:</b> Construction impacts</p>	<p><b>Permanent:</b> Potential mitigation could include relocating the signage to another location on the property or to a nearby, potentially adjacent, property. If nearby relocation is infeasible, providing a new interpretive display on or near the property, documentation under the Historic American Buildings Survey/Historic American Engineering Record, or the compilation of a historic context study detailing Pacific Highway's construction in Fife and its mid-20th-century evolution as a major auto thoroughfare featuring businesses designed to attract customers traveling the highway.</p> <p><b>Temporary:</b></p> <ul style="list-style-type: none"> <li>• Typical BMPs to minimize and avoid construction impacts, such as dust or noise, would be applied</li> <li>• Restore disturbed areas following construction</li> <li>• Access maintained to property</li> </ul>	SF 99-West Alternative with or without the Porter Way Design Option	Use
<b>Fife Segment</b>				
Vacant residence 1309 62nd Avenue E, Fife	<b>Permanent</b> Demolition of NRHP-eligible building	<b>Permanent:</b> Potential mitigation measures could include an interpretive display on or near the property, making the building available for relocation or documentation under the Historic American Buildings Survey/Historic American Engineering Record. The building may not have the structural integrity to withstand relocation.	All Fife Segment alternatives	Use
Pick-Quick 4306 Pacific Highway, Fife	<b>Permanent:</b> Demolition of NRHP-eligible building	<b>Permanent:</b> Potential mitigation measures could include providing a new interpretive display on or near the property, documentation under the Historic American Buildings Survey/Historic American Engineering Record, or the compilation of a historic context study detailing Pacific Highway's construction in Fife and its mid-20th-century evolution as a major auto thoroughfare featuring businesses designed to attract customers traveling the highway.	Fife Pacific Highway Alternative	Use

Notes:

BMP – best management practice; ca. – circa; NRHP – National Register of Historic Places

## 7 LEAST HARM ANALYSIS

If the FTA finds that an alternative causes a Section 4(f) use and there is another feasible and prudent alternative that avoids the use of Section 4(f) resources or only results in a *de minimis* impact on Section 4(f) resources, then the alternative that causes a Section 4(f) use must be removed from consideration. But if there are no prudent and feasible alternatives that can avoid all Section 4(f) resources, then FTA must choose the alternative that will have the least overall harm in light of the statute's preservation purpose. This is called the Least Harm Analysis. The least overall harm is determined by balancing the following factors:

- (i) The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);
- (ii) The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
- (iii) The relative significance of each Section 4(f) property;
- (iv) The views of the official(s) with jurisdiction over each Section 4(f) property;
- (v) The degree to which each alternative meets the purpose and need for the project;
- (vi) After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
- (vii) Substantial differences in costs among the alternatives.

At least one Section 4(f) resource in the South Federal Way and Fife Segments would be used with any of the build alternatives, and no feasible and prudent avoidance alternative has been identified. As a result, a Least Harm Analysis for TDLE will be included in the Final EIS and will take into account Draft EIS comments from agencies with jurisdiction, the public, and consulting parties under Section 106, and possibly new information as design progresses. The alternative with the least overall harm would be selected to proceed.



## 8 COORDINATION WITH OFFICIALS WITH JURISDICTION OF SECTION 4(F) RESOURCES

FTA is engaging in government-to-government consultation with the Puyallup Tribe of Indians, Muckleshoot Indian Tribe, Nisqually Indian Tribe, and the Confederated Tribes and Bands of the Yakama Nation related to significant cultural resources and property owned by the Puyallup Tribe of Indians. FTA and Sound Transit are also coordinating with the City of Federal Way regarding the open space resources along SR 99 that FTA has determined do not qualify as Section 4(f) resources. FTA and Sound Transit are also coordinating with the City of Milton regarding the West Hylebos Osaka Property. The City of Milton preliminarily concurred that TDLE would have a *de minimis* impact on that Section 4(f) resource. FTA and Sound Transit are coordinating with the SHPO and other consulting parties, including the City of Fife, Historic Preservation Officers from King County, Pierce County, City of Tacoma, and Washington Trust for Historic Preservation, regarding the Section 106 properties that qualify as Section 4(f) properties that will require use by TDLE as well as regarding any archaeological resources that may be used and the applicability of Section 4(f). Sound Transit is also coordinating with the City of Fife regarding the proposed Cappa Park, which is currently undergoing planning. The following coordination meetings with the jurisdictions regarding potential use of parks and open space resources have occurred:

- City of Fife: July 10 and August 14, 2024.
- City of Milton: July 11 and August 1, 2024.
- City of Federal Way: June 25 and August 8, 2024.

## 9 REFERENCES

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## ATTACHMENT D.1

### **Section 4(f) Status of Parks and Recreational Resources in the Study Area**

Table D.1-1. Parks and Recreational Section 4(f) Resources

Resource Name	Resource Type/Primary Use	Size	Significant Resource? Yes/No	4(f) Resource? Yes/No
<b>Federal Way Segment</b>				
Cedar Grove Park	Neighborhood park with picnic facilities, play equipment, paved trails, basketball court, and grassy open space	2.7 acres	Yes	Yes
<b>South Federal Way Segment</b>				
West Hylebos Osaka Property	Public conservation area, public access to Hylebos Creek	1.7 acres	Yes	Yes
<b>Fife Segment</b>				
Interurban Trail connection and sp yal pa š Trail <sup>1</sup> (Planned)	Shared-use path connecting the Interurban Trail to the sp yal pa š Trail that is planned to connect Puyallup, Fife, and downtown Tacoma. The connection to the Interurban Trail and a short section of the path across the Wapato Way E Bridge has been constructed as part of WSDOT's SR 167 Completion Project	4 miles (of 7–9 mile total project)	Yes	No, primary purpose is transportation <sup>2</sup>
Cappa Park (Planned)	Proposed to be developed with an outdoor swimming pool and permanent building structures to accommodate supporting amenities, as well as parking and a small pocket park with a playground and walking path, all with egress from Pacific Highway E (City of Fife 2022a and 2022b).	4.2 acres	Yes	Yes

Table D.1-1 Parks and Recreational Section 4(f) Resources (continued)

Resource Name	Resource Type/Primary Use	Size	Significant Resource? Yes/No	4(f) Resource? Yes/No
Tacoma Segment				
sp yal pa š Trail <sup>1</sup> (Planned)	Shared-use path connecting Tacoma to Fife, the Interurban Trail, and Puyallup. In Tacoma, the path is part of the city's Puyallup Avenue Complete Streets project and connects to the Thea Foss Esplanade	1.2 miles (of 7-9-mile total project)	Yes	No, primary purpose is transportation <sup>3</sup>

- Note: All parks are assumed to be significant resources, pending confirmation by the owning jurisdiction.
- (1) The sp yal pa š Trail was previously called the Tacoma to Puyallup Regional Trail during the planning process for the trail.
  - (2) 23 CFR 774.13(f)(4) provides an exception to Section 4(f) regulations for trails, paths, bikeways, and sidewalks that are part of the local transportation system and that function primarily for transportation. This trail meets the exception criteria because it is a multiuse trail that is part of both the local and regional transportation system; its primary function is for transportation.
  - (3) This trail also meets the 23 CFR 774.13(f)(4) criteria as an exception to Section 4(f) regulations because it is a multiuse trail that is also part of the local and regional transportation system, and the primary function is for transportation.





## ATTACHMENT D.2

### **Correspondence**



August 15, 2024

Angelie Stahlnecker  
Planning Manager  
City of Milton  
1000 Laurel Street  
Milton, WA 98354

Subject: Tacoma Dome Link Extension Project  
Section 4(f) Preliminary Concurrence Request

Dear Ms. Stahlnecker:

As part of the Tacoma Dome Link Extension Draft Environmental Impact Statement (EIS) documentation process, Sound Transit and the Federal Transit Administration (FTA), as the lead federal agency, are evaluating the potential impacts of the project on public parks and recreational facilities, wildlife/waterfowl refuges, and historic resources with regards to Section 4(f). Sound Transit is working with the FTA to prepare a draft Section 4(f) Evaluation that describes the impacts of the project on these resources. The draft Section 4(f) Evaluation will be included in the Draft EIS and is expected to be distributed to the Tribes, public and agencies for comment late this year or early 2025.

The U.S. Department of Transportation Act of 1966 requires a Section 4(f) Evaluation. Under the Act, FTA cannot approve a transportation project such as the Tacoma Dome Link Extension that requires the use of publicly-owned land from a significant public park, recreation area, or wildlife and waterfowl refuge, or any land from a significant historic site, unless a determination is made that:

- There is no feasible and prudent avoidance alternative, as defined in § 774.17, to the use of land from the property; and
- The action includes all possible planning, as defined in § 774.17, to minimize harm to the property resulting from such use; or
- The Administration determines that the use of the property, including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures), will have a *de minimis* impact. A *de minimis* impact (23 CFR 774.17) is one that will not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).

Federal guidance encourages early coordination with officials with jurisdiction of the Section 4(f) resource to ascertain the position of the officials to obtain their preliminary views. The intent of our letter is to continue that coordination between Sound Transit and City of Milton staff regarding the project's potential impacts to parks and recreation resources. Within the City of Milton, the Osaka Property appears to be subject to Section 4(f) protection because the City has identified it as a "natural area resource" in the City's 2024 Parks Recreation and Open Space Plan, illustrating its local significance with a primary purpose for preservation of natural areas and stormwater management. Throughout the EIS process and project design, Sound Transit and FTA will continue to consult with the City to further detail specific mitigation plans for the Osaka Property.

Federal regulations stipulate that "officials with jurisdiction over the Section 4(f) resource must concur in writing" with a *de minimis* finding (23 CFR 774.5(2)). The

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regulations also require that an opportunity for public review and comment concerning the effects of the project on the Section 4(f) resource be provided. This requirement will be met with the distribution of the Draft EIS for review and comment by the public, agencies, and organizations. FTA will request final concurrence in writing by the City of Milton on the *de minimis* findings following the comment period for the Draft EIS. At that time, it is anticipated that the City will provide final concurrence on *de minimis* determination for the Osaka Property. Following the City's written concurrence, FTA will make final Section 4(f) *de minimis*, and the Final EIS will include documentation of the City's concurrence and FTA's determination.

At this time, Sound Transit is requesting the City's concurrence with FTA's preliminary *de minimis* impact determination for the Osaka Property that is anticipated to be affected by the project. The City's preliminary concurrence will be included in the Draft EIS for purposes of the analysis and inform the public and other agencies of the City's initial opinion regarding the Section 4(f) uses of this resource. **Figure 1** shows where the Porter Way Design Option, with either the SF 99-West or SF 99-East alternatives, would cross west side of the Osaka Property.

The Porter Way Design Option, with the SF 99-West or SF 99-East alternatives, would permanently incorporate approximately 0.02 acre (approximately less than 1 percent of the total area) of the property to accommodate the project and would temporarily occupy approximately 0.13 additional acre during construction, as shown **Figure 1**. The area affected would be along the western edge of the property that fronts SR 99. This area provides access to the property from SR 99, but, is currently overgrown with vegetation and does not appear to contribute to the significant features of the property that are further to the east (open space and access to Hylebos Creek). Access from SR 99 to the Hylebos Creek on this parcel may be temporarily disrupted during construction. Temporary disruptions to access this property during construction would be coordinated with the City. The temporarily impacted area would be restored when construction is completed. Given that the project's impacts would not adversely affect the features, attributes, or activities that qualify the resource for protection under Section 4(f), Sound Transit requests the City's preliminary concurrence that the Porter Way Design Option with SF 99-West or SF 99-East alternatives would have a *de minimis* use.

We ask that you provide preliminary concurrence by returning this letter with your signature below. Sound Transit acknowledges that a formal concurrence from the City of Milton will require further discussions and review of public comments received on the Draft EIS.

Sound Transit appreciates the City's continued coordination on the Osaka Property. We are requesting response to this request within 30 days in order to incorporate the city's response in the Draft EIS. Please contact me or Elma Borbe at (206) 398-5445 or [elma.borbe@soundtransit.org](mailto:elma.borbe@soundtransit.org) if you have any questions.

Sincerely,

Signed by:

*Erin Green*

Erin Green (206) 398-5445

South Corridor Environmental Manager

[erin.green@soundtransit.org](mailto:erin.green@soundtransit.org)

(206) 398-5464

Signed by:

*Angelic Stahlnecker*

746DBB842848448...

9/3/2024

Angelic Stahlnecker, Planning Manager

Date

Concurrence

cc: Dustin Madden, Public Works Director  
Curvie Hawkins, TDLE Project Director  
Elma Borbe, Environmental Planner



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

September 23, 2024

Susan Fletcher  
Regional Administrator  
Federal Transit Administration  
915 Second Avenue  
Federal Bldg. Suite 3192  
Seattle, WA 98174-1002

In future correspondence please refer to:  
Project Tracking Code: 2018-02-01251  
Property: Tacoma Dome Link Extension  
Re: Adverse Effect

Dear Susan Fletcher:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHHP) regarding the above referenced proposal. This action has been reviewed on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. Our review is based upon documentation contained in your communication: Historic and Archaeological Technical Report.

First, we concur that Property ID: 31927 Residence 1309 62nd Ave E, Fife, Washington 98424 is eligible for listing in the National Register of Historic Places (NRHP) under Criterion A, B and C. We also concur that Archaeological site 45PI1557 is eligible for listing in the NRHP.

Finally, we concur that the project as proposed will have an adverse effect on resources listed in, or eligible for listing in, the National Register of Historic Places due to the demolition of the Historic-era residential structure at 1309 62nd Avenue East and to Site 45PI1557 under all project alternatives.

Given our adverse effect determination, we look forward to developing a Programmatic Agreement to resolve adverse effects to historic properties.

Also, we appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult for this project. Our comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in conformance with Section 106.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

Maureen Elenga, M.A.  
Transportation Reviewer  
(360) 972-4539  
Maureen.Elenga@dahp.wa.gov

