Appendix A

Comment Submissions received from Tribes and Agencies

PUYALLUP TRIBE OF INDIANS

February 10, 2025

VIA ELECTRONIC MAIL (TDLINKDEIS@SOUNDTRANSIT.ORG)

TDLE Draft Environmental Impact Statement Comments
c/o Elma Borbe
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

RE: Extension to Providing Detailed Comments on the DEIS Pending Tribal Consultation

I am writing to confirm that the Puyallup Tribe will submit detailed comments on the Tacoma Dome Link Extension Draft Environmental Impact Statement ("DEIS") following a leadership consultation meeting with Sound Transit. This meeting is a part of our ongoing consultation on the project, and until it takes place, the Tribe cannot provide full comments on the DEIS. I understand we are striving for the leadership consultation meeting to occur at the end of February.

We would like to note that the Puyallup Tribe has consistently voiced its concerns about the TDLE project's long-term impacts on our lands and will continue discussions to address them through consultation. As stated in previous consultations, we have concerns that will require continued coordination and mitigation.

However, I also want to raise an additional issue for consideration. The Puyallup Tribal Government does not represent individual Tribal Members who own individual parcels of land, many of which are held in Trust by the United States of America and will be directly impacted by this project. Tribal staff recently became aware of potential significant project changes, including the relocation of several storm water ponds, that may occur after the DEIS comment period. If these changes happen after comment period closes, it is unclear whether individual Tribal Members will have the opportunity to provide input, despite the potential impact on their lands. The Tribe is concerned about this gap in the environmental review process and insists that its members be given the opportunity to comment on all design elements, including the final placement of stormwater ponds.

3002 Duct Cho Street, Tacoma, WA 98404 * Ph: (253) 573-7877 * Fax: (253) 680-5998

As discussions continue, we look forward to continuing to consult with Sound Transit throughout the life of this project and appreciate your continued commitment to meaningful and respectful communications through consultation and look forward to identifying pathways forward that will be mutually beneficial to the project and to the Tribe.

Sincerely,

Lisa A.H. Anderson
Law Office of the Puyallup Tribe of Indians

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

February 4, 2025

Ms. Linda Gehrke
Regional Administrator
Federal Transit Administration
915 Second Avenue
Suite 3142
Seattle, WA. 98174-1002

In future correspondence please refer to:
Project Tracking Code: 2018-02-01251
Property: Tacoma Dome Link Extension
Re: Draft Programmatic Agreement Review Comments

Dear Ms. Gehrke:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP) and providing a copy of the draft programmatic agreement for the above referenced project. As a result of our review, we have the following comments:

- DAHP is requesting a stipulation to address historic database infrastructure. We request a similar stipulation to the one negotiated for the West Seattle Link Extension project.

- DAHP requests additional consultation with FTA and ST regarding Stipulation VIII of the proposed programmatic agreement

- We will defer additional comments until the draft treatment plans are circulated for review and comment.

We appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov

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

February 6, 2025

Ms. Linda Gehrke
Regional Administrator
Federal Transit Administration
915 Second Avenue
Suite 3142
Seattle, WA. 98174-1002

In future correspondence please refer to:
Project Tracking Code: 2018-02-01251
Property: Tacoma Dome Link Extension
Re: Archaeology - No Historic Properties

Dear Ms. Gehrke:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP) and providing a copy of draft technical report for the above referenced project. As a result of our review, we concur with the results of this report and have no substantial comments at this time. We do request that a coversheet is added to the report and uploaded to WISAARD at your earliest convenience.

If information becomes available and/or the scope of work changes, please resume consultation with DAHP and all consulting parties. In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity must stop, the area secured, and contact made with concerned tribes and DAHP for further consultation.

We appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36 CFR 800.4(a)(4).

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer (SHPO) in conformance with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,

Dennis Wardlaw
Transportation Archaeologist
(360) 485-5014
dennis.wardlaw@dahp.wa.gov

From: 9-ANM-RA-Office (FAA) <9-ANM-RA-Office@faa.gov>
Sent: Monday, December 23, 2024 2:52 PM
To: Green, Erin <erin.green@soundtransit.org>
Cc: 9-ANM-RA-Office (FAA) <9-ANM-RA-Office@faa.gov>; Stone, Grady (FAA) <grady.stone@faa.gov>; Best, Aleta (FAA) <Aleta.Best@faa.gov>
Subject: RE: Notice of Availability – Tacoma Dome Link Extension Draft Environmental Impact Statement

Good afternoon, Erin.

RE: We look forward to receiving your comments and appreciate your review of the Draft EIS and the Section 106 draft Programmatic Agreement.

The FAA has no comments.

Regards,

Jennifer L. Redding

Program Analyst |Congressional Liaison

Office of the Regional Administrator

Northwest Mountain Region

Office Phone: (206) 231-2393

Office Email: 9-ANM-RA-Office@faa.gov

REGION 10
SEATTLE, WA 98101

February 19, 2025

Todd Tillinger, Environmental Protection Specialist
Federal Transit Administration
915 Second Ave., Suite 3192
Seattle, Washington 98174

Elma Borbe, Senior Environmental Planner
Sound Transit
401 S. Jackson St.
Seattle, Washington 98104

Dear Todd Tillinger and Elma Borbe:

The U.S. Environmental Protection Agency has reviewed Federal Transit Administration's December 2024 Draft Environmental Impact Statement for the Tacoma Dome Link Extension (CEQ Number 20240231, EPA Project Number 18-0020-FTA). The EPA has conducted its review pursuant to the National Environmental Policy Act and our review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA and requires the EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The DEIS evaluates the potential environmental impacts associated with building and operating the Tacoma Dome Link Extension (TDLE) in King and Pierce Counties, WA. The proposed TDLE project will extend existing light rail service along approximately 10-miles of dedicated guideway and a total of four stations extending across ancestral and reservations lands of the Puyallup Tribe of Indians, as well as cities of Federal Way, Fife, Milton, Tacoma, and unincorporated Pierce County. The DEIS identifies and evaluates a No Action Alternative and multiple build (light rail) alternatives in the project corridor, including a preferred alternative for a portion of the project, with the exception of sections through Federal Way and Fife. All build alternatives will cross the Puyallup River at the same location using a rail-only fixed-span bridge.

The EPA is supportive of the TDLE project's goals to improve regional mobility, alleviate degraded traffic conditions, and improve commuter travel time. The EPA also supports goals to provide regional transit while minimizing adverse impacts on the environment through sustainable practices.

The EPA identified environmental quality concerns and deficiencies in the analysis to address in the Final EIS regarding hazardous materials and contaminated sites, aquatic resources, impacts to the

human environment, air quality, and resilience. The enclosed Detailed Comments provide greater detail of these and other concerns, as well as recommendations for the FEIS.

Thank you for the opportunity to review the DEIS for this project. If you have questions about this review, please contact Ariana Monroy of my staff at 206-553-2120 or at monroy.ariana@epa.gov, or me, at 206-553-2117 or at sturges.susan@epa.gov.

Sincerely,

Susan Sturges, Acting Manager
NEPA Branch

Enclosure

Hazardous Materials and Contaminated Sites

The DEIS identified hazardous material sites in the project area, which may overlap areas of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Commencement Bay, Near Shore/Tide Flats Superfund Site and waters of the U.S. (WOTUS).[1] Construction occurring at stream and river crossings has the potential to mobilize contaminated sediments that may be present and exacerbate hazardous waste and contribute to turbidity and sedimentation. If hazardous materials are found within WOTUS and within the CERCLA site, hazardous waste should be disposed of appropriately. The EPA expects close coordination between the EPA, FTA, and Sound Transit to ensure that contaminants are not being released at the selected stream and river crossings and to ensure that construction methods and best management practices are compatible with CERCLA decisions and remedy implementation for the Commencement Bay, Near Shore/Tide Flats Superfund Site. For questions related to the Superfund Site, and when FTA and Sound Transit have more information after the DEIS public comment period, please contact the EPA R10 Remedial Project Manager (huynh.carolyn@epa.gov, 206-553-0454).[2]

The EPA recommends the FEIS:

- Discuss the areas of suspected contaminated sediments, identify a water quality monitoring plan during construction and operation, and identify specific Best Management Practices (BMPs) to reduce mobilization of contaminated sediment.
- Consider water treatment for construction-related dewatering of wetlands prior to discharge. The EPA recommends treating water at a sanitary facility before discharge for construction in the Fife and Tacoma segments to avoid further exacerbating contamination at nearby hazardous waste sites.

Aquatic Resources

The DEIS addresses critical habitat and other natural resource areas protected under local critical areas ordinances and other programs and regulations.[3] The EPA recommends the FEIS also address habitat sites established under NOAA's Natural Resource Damage Assessment (NRDA) that may have additional site protections. A network of NRDA habitat sites were established by the Commencement Bay Trustees. It appears that the Porter Way, SF 99-West, and SF 99-East alternatives have the potential to impact the Synder, Hylebos Creek Buffer, West Fork Hylebos Creek Habitat (Karileen), and Spring Valley Ranch sites that are located along SF-99. The EPA notes the Karileen site is subject to a settlement as described in a Consent Decree between General Metals and the Trustees.[4]

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[1] DEIS, page 4.12-2.

[2] https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=1000981

[3] DEIS, page 4.9-16.

[4] United States of America, State of Washington, Puyallup Tribe of Indians, and Muckleshoot Indian Tribe vs. General Metals of Tacoma, Inc., Consent Decree. 2007.

Clean Water Act (CWA) Section 404

The Hylebos watershed experiences ongoing impacts stemming from industry and urbanization, and remaining wetlands in the area are very valuable to ecosystem functions in Commencement Bay. The EPA recommends the FEIS consider:

- Additional mitigation for alternatives with impacts to water resources in the Hylebos watershed, with credit-to-debit ratios that adequately reflect the value of the impacted resources in light of extensive cumulative impacts.[5] This mitigation could encompass a variety of mitigation approaches such as preservation of intact aquatic ecosystems, enhancement of degraded wetlands or streams, and the re-establishment of hydrologic connectivity to isolated wetlands within the watershed. Given the growing threat of urban expansion within the Hylebos watershed, the EPA supports efforts that aim to restore and bolster anadromous fish habitat.
- A higher credit-to-debit ratio to provide adequate mitigation for unavoidable impacts to high value aquatic resources and existing restoration sites, including NRDA habitat sites. The EPA notes that properties located along Hylebos Creek north of 8th street have been identified as preferential areas by the Puyallup Tribe as they would serve as links between upstream restoration sites and downstream ecosystems.[6] Protecting and restoring these habitats will help strengthen both local ecologic integrity while also advancing broader regional efforts[7] to ensure long-term survival of salmon populations in Puget Sound.

CWA Section 303

While the DEIS acknowledges that surface waters in the study area discharge to the stream basins of Hylebos Creek, Wapato Creek, and the Puyallup River, only streams in the study area are discussed in the Affected Environment section.[8] The EPA recommends the FEIS include additional information to support the water quality analysis and broadening the discussion to include receiving waters or downstream waters outside the study area, as effects to study area streams could move downstream and affect water quality. For example:

- Commencement Bay, directly downstream of Hylebos Creek tributaries, is impaired by Dieldrin, PCBs, chlorinated pesticides, DDT, halogenated polycyclic aromatic hydrocarbons (HPAHs), Benzo(a)anthracene, Benzo(a)pyrene, Benzo(b)fluoranthene.
- The most recent Integrated Report indicates impaired water quality based on benthic macroinvertebrate bioassessment parameter for sections downstream of Hylebos Creek.

Given that the current condition of many of the surface waters within and adjacent to the project area exceed one or more of the CWA Section 303 water quality standards, it is important to understand whether and how construction and operation may impact existing water quality issues. The EPA recommends the FEIS:

- Describe relevant downstream impairments.

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[5] 40 CFR § 230.93(f)(2)

[6] Personal communication with the Puyallup Tribe on 12/20/2024.

[7] Puget Sound Comprehensive Conservation and Management Plan, approved by the USEPA (2022). https://www.psp.wa.gov/2022AAupdate.php. Accessed 1/31/2025.

[8] DEIS, Table 4.8-1.

- Consider and address how construction and operation associated with the proposed alternatives could mobilize sediments and associated pollutants and potentially impact receiving water quality (e.g., Commencement Bay). For example, address potential construction impacts related to the proposed reconfiguring of the stream channel for the Preferred FW Enchanted Parkway Alternative that could affect downstream sediment regimes.[9]
- Address how the proposed alternatives may impact and comply with the Puyallup River Bacteria Total Maximum Daily Load (TMDL).

CWA Section 401

The CWA provides states and authorized Tribes the authority to grant, deny, or waive certification of proposed federal licenses or permits that may discharge into WOTUS. This section of the CWA is an important tool for states and authorized Tribes to help protect the water quality of federally regulated waters within their borders, in collaboration with federal agencies. The EPA recommends coordination with all potential certification authorities (Puyallup Tribe of the Puyallup Reservation, Washington Department of Ecology, EPA R10) regarding CWA Section 401 for the purposes of streamlining regulatory processes.

Safe Drinking Water Act Sole Source Aquifer

The Sole Source Aquifer (SSA) program enables the EPA to designate an aquifer as a sole source of drinking water and establish a review area.[10] The EPA then reviews proposed projects that will both be located within the review area and receive federal funding. The review area includes the area overlying the SSA and may also include the source areas of streams that flow into the SSA's recharge zone. The EPA's review intends to ensure that the projects do not contaminate the SSA. This proposed project appears to be partially located within the Central Pierce County Aquifer Area, which received designation as a SSA by the EPA in 1994. The EPA recommends coordination with the appropriate EPA R10 Regional Contact for the Sole Source Aquifer Program regarding the SSA review requirements (contact information is linked below).[11]

Impacts to the Human Environment

The EPA appreciates the analysis on potential impacts to community facilities, neighborhood character, social resources, and community cohesion. The EPA agrees that the TDLE could positively impact communities in the study area by increasing transit reliability, connectivity, service frequency, and potential access to employment opportunities.[12] The EPA has concerns that the project may result in reasonably foreseeable adverse impacts to neighboring communities and recommends the FEIS further analyze and consider specific mitigation measures to address potential impacts to all neighboring communities, in accordance with FTA's Environmental Standard Operating Procedures 11.[13]

[9] DEIS, page 4.8-15.
[10] https://www.epa.gov/dwssa. Accessed 1/31/25.
[11] https://www.epa.gov/dwssa/sole-source-aquifer-contacts-epas-regional-offices#region10. Accessed 1/31/25.
[12] DEIS, page 4.4-12.
[13] https://www.transit.dot.gov/regulations-and-guidance/environmental-programs/receiving-and-responding-public-and-agency-comments. Accessed 2/4/25.

While the DEIS notes 135 to 218 potential properties may be affected and displaced from the proposed alternatives that will be subject to the Uniform Relocation Act, the EPA highlights several examples of potential adverse impacts that may warrant additional consideration in the FEIS:

- The Federal Way Segment would result in potentially 77 to 102 residential displacements under the Preferred FW Enchanted Parkway Alternative at the senior Belmor Mobile Home Park.[14] The EPA is concerned about potential direct adverse impacts to a senior community and recommends the FEIS address and consider measures to mitigate potential direct adverse impacts to this senior community.
- The DEIS identifies an 84-unit emergency shelter that will be displaced under the SF Enchanted Parkway Alternative, however; specific mitigation or commitment to relocate the shelter is not discussed.[15] The EPA recommends the FEIS address and consider measures to mitigate shelter impacts.
- The DEIS notes that the proposed action would likely result in indirect economic impacts, including increased property value.[16] The DEIS notes a multitude of below market rate housing communities in the project area.[17] Sound Transit and the City of Tacoma provide guidance relating to the need for diverse housing types around major transit stations.[18,19] The EPA recommends the FEIS consider specific mitigation actions to address populations that may be adversely impacted by increased property values.

Mitigation

The EPA encourages the FEIS to consider alternatives or measures that address impacts to displaced communities and businesses and improve community cohesiveness to enhance the quality of the human environment. Consider developing specific mitigation measures to address the potential adverse impacts to all communities that are vulnerable to the project. In developing mitigation measures, consider mechanisms to minimize impacts of the proposed project and to shape mitigation efforts through public participation with each uniquely impacted population.

An example of a mitigation measure the EPA has seen applied in other federal projects to address impacts on communities is the development of a community benefits agreement (CBA). CBAs have been used to mitigate impacts to displaced communities and those with disrupted community cohesion from displacement of community gathering spaces like churches. Developing a CBA involves robust public participation to ensure mitigation measures benefit impacted populations. Consider neighborhood plans and goals when identifying mitigation measures to help inform mitigation to offset potential adverse impacts. Community benefits may vary from community to community depending on their unique attributes. Consider reviewing previous strategies to develop a CBA such as Federal Highway Administration's South End Park neighborhood redevelopment project,[20] and the FHWA's

[14] DEIS, page 4.1-4.
[15] DEIS, page 4.1-7.
[16] DEIS, page 4.3-15.
[17] Affordable housing and nonsubsidized below market rate housing within the study area is described on page 4.4-2 through 4.4-6.
[18] DEIS, page 4.2-19 refers to Sound Transit's Equitable Transit Oriented Development Policy (2018).
[19] DEIS, page 4.4-21 refers to City of Tacoma One Tacoma Plan and South Downtown Subarea Plan.
[20] https://www.fhwa.dot.gov/environment/environmental_justice/resources/ej_and_nepa/case_studies/case08.cfm. Accessed 1/31/2025.

Interstate 526 Low Country Corridor West project,[21] in which community members helped inform innovative mitigation measures.

Public Participation

The EPA appreciates the outreach that has been conducted so far during the NEPA process.[22] The EPA recommends the FEIS include a discussion on how public input will inform the decision-making process, in alignment with FTA's NEPA Standard Operating Procedures.[23]

Tribal Consultation

The EPA encourages continued consultation with affected Tribes and to incorporate feedback from the Tribes when making decisions regarding the project. The EPA recommends the FEIS describe the issues raised during consultations and how those issues were addressed.

Air Quality

The EPA acknowledges the air quality analysis, while noting Section 4.6.3.3 states that quantitative construction emission estimates are not available because details such as construction schedule, phasing, haul trips, and equipment use are not yet defined at this stage of the project.[24] Without the quantification of criteria pollutant emissions, it is difficult to determine whether construction emissions will lead to a potential violation of any air quality standards. The EPA recommends the FEIS:

- Estimate construction emissions using data available such as that from another project that are similar in scope to this project.
- Include design values for monitored criteria air pollutants rather than an annual average,[25] as design values are the typical statistic used to assess progress towards meeting the National Ambient Air Quality Standard (NAAQS).
- Consider the potential cumulative effects of air emissions, including from construction and operation, that could result from the proposed alternatives to communities already burdened by cumulative air emissions from nearby sites (e.g., Bridge Industrial, SeaTac Airport, OMF South).

Resilience

The EPA encourages the FEIS to further consider resilience planning in the project design to prepare for future stressors that pose risks to its operations and infrastructure, particularly given the long-lived nature of the planned infrastructure. Resilience planning, including considering measures such as raising infrastructure to accommodate higher flood levels, implementing durable materials that can withstand variable temperatures, and integrating green infrastructure (nature-based solutions) to enhance soil stability to better withstand erosion caused by flooding, may limit infrastructure damage and minimize unnecessary maintenance and replacement of public facilities due to damage from flooding and extreme weather events. The Draft EIS acknowledged that increased precipitation and sea-level rise could result in elevated flood risk to the proposed infrastructure. The FEIS could also

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[21] I-526 LCC West FEIS, Appendix F.

[22] DEIS, Appendix B.

[23] https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/regulations-and-guidance/environmental-programs/55996/11-responding-comments.pdf. Accessed 1/31/2025.

[24] DEIS, page 4.6-9.

[25] DEIS, Table 4.6-1 on page 4.6-3.

evaluate sensitivity and adaptive capacity to inform the design of the alternatives and agency decision making, as outlined in FTA's Transit Resilience Guidebook.[26]

We also encourage the FEIS to consider opportunities to design features that can improve energy efficiency, reduce waste, and reduce stormwater pollution runoff using onsite storm management features.[27]

[26] https://www.transit.dot.gov/sites/fta.dot.gov/files/2024-05/TPE-FTA-Resilience-Guidebook-05-29-2024.pdf. Accessed 1/31/2025.
[27] https://www.epa.gov/green-infrastructure. Accessed 1/31/2025.

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February 10, 2025

By Email

Susan Fletcher
Federal Transit Administration
915 Second Avenue, Suite 3192
Seattle, WA 98174-1002

Perry Weinberg
Sound Transit
401 S Jackson Street
Seattle, WA 98104-2826
tdlinkdeis@soundtransit.org

RE: Tacoma Dome Link Extension NEPA/SEPA DEIS City of Federal Way Technical Review Comments

Dear Ms. Fletcher and Mr. Weinberg,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Tacoma Dome Link Extension (TDLE). As you are aware a portion of the planned alignment and an additional light rail station are proposed within the City of Federal Way. We have appreciated the collaborative nature of the relationship Sound Transit staff looks to have with the City.

CITY OF Federal Way
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Comments by the City of Federal Way are as follows:

Executive Summary

Page ES-19 and ES-20

- Table ES-3 Summary of Key Potential Impacts – South Federal Way Segment references the use of weekend closures of SR 99 for both the SF 99 West and SF 99 East alternatives. The use of weekend closures has not been previously discussed with the City of Federal Way and additional justification for a full weekend closure is required before it could be permitted.

- The SF 99 West alternative shows 6.31 acres of permanent wetland impact however, the impacted wetlands along the west side of Pacific Highway South within this area are located on parcels with several deed restrictions that may prove difficult or impossible to remove. This needs to be noted within the table in order to understand the full impact.

Page ES-34

- Section ES.3.2.5 Minimum Operable Segments and Interim Terminus for TDLE indicates that the parking facilities at the South Federal Way station would open by 2038 however the main DEIS includes the option for some interim surface parking between 2035 and 2038. This section should be updated to reflect the option for interim surface parking.

Alternatives Considered

Page 2-2

- The DEIS specifies that "All light rail alternatives would operate on a fixed guideway in exclusive right-of-way, outside of traffic, with no at-grade street crossings." However, it appears that all alternatives at least partially use existing City right-of-way and are not in exclusive right-of-way.

Page 2-10

- Section 2.1.2 Build Alternatives and Options specifies the options for no parking on opening day or interim surface parking sometime between 2035 and 2038. More information is needed on the proposed number of stalls for interim surface parking.

Page 2-19

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- The SF 99-Enchanted Station option includes driveway access to S 352nd St from the bus station area. The City has previously provided feedback that this access would at a minimum need to be restricted access (right in/right out only) if at all permissible.

Page 2-44

- Section 2.5.4 Overview or Construction Approach for TDLE Alternatives refers to the guideway running within the median of Pacific Highway South. There is currently no center median within this portion of Pacific Highway South in South Federal Way and therefore would require Sound Transit to widen the road to create this. Additionally, the City has concerns for the long-term maintenance requirements of this type of configuration as well as the access restrictions that this will create for properties along Pacific Highway South.

Transportation Environment and Consequences

Page 3-02

- Table 3-10 references an assumption of a 500-stall parking facility along with 520 park-and-ride trips, however because of the provision to allow for a delay in the installation of the parking facilities at the South Federal Way station if these trips are instead pick-up/drop-off trips they would result in a greater vehicular impact.

The following comments are related to Appendix F Conceptual Design Drawings

Page A00-KAP02 (21)

- Sidewalk at the intersection of S 333rd St and 24th Ave S is shown terminating at the intersection. Sidewalk shall not terminate in the middle of an intersection.

- Proposed improvements for S 330th St are obscured by the street label. Please adjust so all improvements are visible.

Page A00-KAP03 (22)

- The plans show a proposed stormwater facility on the south side of S 336th St, however this area is the site of the proposed Sound Transit Operations and Maintenance Facility South. A new location shall be proposed for the facility and the plans shall be updated to reflect the site location for the Sound Transit Operations and Maintenance Facility South.

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- The City has plans for a 12-foot shared use plan along S 336th St. Please ensure the proposed improvements are compatible with the City's plans.

Page A00-KAP04 (23)

- Evaluation of potential impacts to parking and lighting within the parking lot area of Walmart is needed.
- A column for the proposed guideway appears to fall within the roadway for S 347th Pl. please ensure columns do not fall within roadway area.

Page A00-KAP05 (24)

- Ensure frontage improvements are consistent with City standards.
- Column placement within private parking areas will need to be further evaluated for potential impacts in relation to parking stalls and site lighting.
- Ensure proposed parking stalls meet City code in regard to the distance from a drive aisle that connects to City roads to avoid conflicts with vehicles entering and exiting the roadway.

Page A00-KAP06 (25)

- Any columns placed within the roadway clear zone shall be evaluated to determine if crash attenuation is necessary.

Page A00-KAP07 (26)

- Additional improvements would be required for pedestrian and bike crossings and ramps in accordance with City standards.
- Additional improvements to frontage around roundabouts would be required to ensure cyclists are able to exit the roadway at the roundabout entrance with a ramp, have sufficient sidewalk space for a multiuse path, and are then able to return to the roadway with a ramp.

Page A00-KAP08 (27)

- Any proposed driveways shall meet City standards for width and spacing.
- Proposed frontage improvements shall include transitions from sidewalk to existing roadway when frontage improvements are no longer present within the right-of-way.

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Page A00-ASP101 (29)

- The following comments for the SF Enchanted Parkway Station also apply to the SF 352nd Span station option.
- The SF Enchanted Parkway station site plan includes a bus only aisle that goes around the proposed parking structure however, there does not appear to be sufficient turning area for buses. Curve radii shall be evaluated to ensure two buses may pass concurrently. If insufficient curve radii and sight distances are present, site alterations or additional property may be required.
- The location of the proposed parking structure appears to impact sight lines for the bus only aisle. Further evaluation is necessary.
- How will the bus only access/egress be enforced for the bus aisle adjacent to the proposed parking structure?
- Further information is required for the proposed pickup/drop-off area adjacent to the proposed parking structure including method of ingress and egress in relation to the garage along with how access will be controlled around the garage.
- Any parking stalls which abut pedestrian walkways shall include curb stops to keep vehicles from encroaching.

Page A00-ASP102 (30)

- The following comments for the SF Enchanted Parkway Station also apply to the SF 352nd Span station option.
- The SF Enchanted Parkway station with surface parking option appears to provide a dead-end lane within the parking area. Please adjust to be compliant with City standards. Adjustment may require additional property acquisition to maintain required parking stalls.
- Proposed surface parking stalls north of the proposed SF Enchanted Parkway station with surface parking option do not appear to provide sufficient drive aisles and connections to the existing parking lot. Additional access details are needed.
- The proposed pickup and drop off area for the SF Enchanted Parkway station with surface parking option appears to occur within the drive aisle of the proposed parking lot. Adjustment of the site layout is necessary to separate the pickup and drop-off area

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from the main parking lot. Additional property may be required after site layout adjustment to maintain appropriate parking stall requirements.

Page A00-APP101 (31)

- The following comments for the SF Enchanted Parkway Station also apply to the SF 352nd Span station option.
- Adjustment to the proposed Parking structure layout for the SF Enchanted Parkway station option may be required due to potential conflicts with pedestrians and vehicles entering/exiting the garage.

Page C00-KAP06 (45)

- The guideway for the SF I-5 alternative appears to have conflicts with the mast arms for the existing signal heads where it crosses over Enchanted Parkway near I-5. Further evaluation is required to ensure appropriate sight distance for the signal heads is maintained.
- The columns/guideway for the SF I-5 alternative appear to impact the curb line near the I-5 off ramp to Enchanted Parkway. Further evaluation is required.

Page C00-ASP101 (48)

- Ensure frontage improvements for the SF I-5 station option are consistent with City standards including providing a planter strip.

Page C00-ASP102 (49)

- Any parking stalls that abut pedestrian walkways shall include curb stops to keep vehicles from encroaching.
- The SF I-5 station with surface parking option includes additional driveway access points which would necessitate restricted vehicles movements with right-in/right-out restrictions. Does this have impacts to overall routing and vehicular impacts?

Page JA0-KAP04

- Column placement within private parking areas will need to be further evaluated for potential impacts in relation to parking stalls, pedestrian walkways, and site lighting.

Page JA0-KAP05

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- For the SF 99 East and West guideway alignments the signal heads at the S 348th/SR-18 and Enchanted Parkway S intersection need to be evaluated to confirm appropriate sight distance is maintained.

- Please ensure proposed frontage improvements are consistent with City standards.

Page JA0-KAP06

- Any columns placed within the roadway clear-zone shall either provide or be evaluated to demonstrate crash attenuation is not necessary.

Page JA0-KAP07

- Storm lines for Sound Transit maintained storm systems will not be allowed to cross the right-of-way without a franchise agreement with the City of Federal Way.

- Column placement should be evaluated to ensure sight distance is maintained.

Page JA0-KAP09

- Guideway placement within the median of Pacific Hwy South requires additional improvements to the roadway area as a portion of Pacific Hwy South does not contain a median.

Page JA00-ASP101

- The layout of the bus pickup/dropoff and layover stalls do not appear to provide adequate space for turning movements. Please reevaluate.

Page JA00-ASP102

- The layout of the surface parking lot for the SF 99 352nd Station with surface parking option includes a drive aisle in an awkward location. Please reassess to limit the number of crossings for pedestrians traveling through the lot.

Page KA00-ASP101

- The number of proposed driveway access points shown along S 352nd St on the SF 99 Enchanted station site plan exceeds the maximum allowed per City standards.

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The following comments are related to Appendix J1 Transportation Technical Report

Page J1-9

- Section 4.1 paragraph 2 appears to have an error in the date referenced. The first sentence lists the dates between 2016 and 2029 when referencing ridership. Was this meant to be 2019? Please update.

Page J1-65

- Figure 4-23 has labels which appear to block key information. Please adjust.

Page J1-94

- Table 4-40 includes information for parking supply and utilization however no information is provided for Federal Way.

Page J1-101

- Section 5.1.3 Facility Screenline Traffic Volume Projections references that Screenline volumes and v/c results are summarized in Table 5.3 – What proportion of vehicle trips would shift to transit and how were these assumptions developed?

Page J1-113

- In Section 5.2.3 there is reference to deferred parking at the planned South Federal Way and Fife stations. How will parking be accommodated during this time? Additionally, there is reference in the same section that if no parking is provided at these stations during this time that daily boardings would increase at other stations including up to

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100 at the Federal Way Downtown station – Is there sufficient parking to accommodate this?

Page J1-114

- Section 5.2.4 Table 5-10 shows 520 Park-and-Ride passengers exiting during the PM peak period – How does this align with a 500-space garage?

- Section 5.2.4 Table 5-10 shows 270 pickup passengers exiting during the PM peak period – Does this align with the number of parking spaces provided?

Page J1-115

- Table 5-10 continued shows 400 pickup passengers exiting during the PM peak period in the 'Without Parking' option – Where would pick-up/drop-off occur in the 'Without Parking" scenario to ensure that impacts to public space do not occur?

Page J1-116

- Table 5-11 shows 60 drop-offs for passengers boarding during the PM peak period - Similar to exiting passengers, how would pick-up/drop-off space be designed in the "without parking" scenario such that impacts to public space are mitigated?

Page J1-125

- Section 5.2.6 Minimum Operable Segments and Interim Termini - Conceptual plans addressing this scenario should be provided to understand full site impacts and ability to accommodate such condition. The City has not evaluated the impacts of the proposed concept, nor has Sound Transit demonstrated how this would not create adverse impacts that would require mitigation.

Page J1-126

- Table 5-15 2042 Regional and TDLE Transit Trips with the South Federal Way Interim Terminus – Need to ensure that operational analysis addresses the significant decrease in transit activity compared to Build Alternative

Page J1-127

- Table 5-19 PM Peak Period Mode of Access at South Federal Way Interim Terminus (2042) Passengers Exiting the Train – Need to understand how this would be designed to

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accommodate both a park and ride facility and increased transit transfers. Also, why would pick-up trips significantly decrease under this scenario?

Page J1-130

- Section 5.3 Arterials and Local Streets, the top bullet on page J1-130 mentions that 'South Federal Way Segment intersections would operate within City of Federal Way and WSDOT standards for both No-Build and build alternatives.' However, what about the interim build conditions?

Page J1-131

- Section 5.3.1.1 No-Build Alternative references the I-5 SR 161/SR 18 Triangle Improvement (Triangle) Project which was suspended in 2023 with no scheduled date of resumption – What would happen if this project is abandoned permanently? Would it result in operational impacts within the study areas?

Page J1-132

- Section 5.3.1.2 the last paragraph references increased park and ride activity – How would increased park and ride activity be accommodated at the station? Additionally, if people are parking at off-site locations, are pedestrian accommodations sufficient for that activity?

Page J1-134

- Table 5-26 TDLE Peak Hour Vehicle Trips by Station – Consistent with the modes of access information, this results in 520 vehicles entering and exiting the park and ride facility each day, but only a 500-space parking facility is proposed. If this amount of activity can't be accommodated at the park and ride, more trips may shift to pick-up/drop-off which has a higher net new vehicle trip impact.

Page J1-138

- Section 5.3.1.3 Interim Termini - The section mentions that pickup and drop-off trip generation would be the same as the build alternatives for the interim termini – The trip generation is different for the interim scenarios. The trip generation outlined for the interim scenario indicates a lower trip generation for pick-up/drop-off activity; however, the justification for this assumption is not clear. Please address.

Page J1-140

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- The South Federal Way I-5 Alternative mentions pickup and drop-off parking would be access from the driveways on S 356th St and Enchanted Parkway, however would this alternative still be possible in the event that the Triangle Project is permanently abandoned?

Page J1-187

- Figure 5-20 shows existing and funded pedestrian facilities within 1 mile of the South Federal Way proposed station locations. There is a gap before the SF I-5 station option - How do these gaps impact access to the SF I-5 option, and what is proposed to close these gaps?

Page J1-194

- Figure 5-26 shows the no-build and build alternatives pedestrian level of service at intersections near the South Federal Way segment – Would these conditions change under the interim terminus scenario or when the parking facilities are not yet in place?

Page J1-204

- Section 5.5.4.7 South Federal Way I-5 Alternative references the Triangle project – How would this alternative be impacted in the event that the Triangle Project is permanently abandoned?

Page J1-214

- Section 5.6.4.1 references that bus transit and paratransit facilities would be within the station footprint, however this is not an accurate statement. As shown in the conceptual plans and noted below, for many station alternatives there is a bus stop shown in the roadway adjacent to the station, such that transfers would require pedestrian crossings and additional potential for conflicts between different travel modes. It should be confirmed that this was considered for the nonmotorized evaluation of build conditions.

- Section 5.6.4.3 South Federal Way I-5 Alternative mentions the potential that buses may serve an on-street bus stop along Enchanted Parkway S – The location of a potential bus stop is not indicated on the conceptual plans. If a bus stop is located south of S 356th Street pedestrians transferring may try to cross mid-block rather than cross at the roundabout due to the added walk distance. This should be considered as part of the station design plan, safety evaluation, and nonmotorized evaluation.

Page J1-215

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- Section 5.6.4.4 South Federal Way 99-East Alternative needs to include the potential impacts of an on-street bus stop adjacent to the station and should address any impacts.

Page J1-221

- Section 5.7.2 states that the build alternatives would impact public on-street and off-street parking in the South Federal Way segment, however this does not align with the information in the table which indicates no impacts to public parking in the South Federal Way Segment. This requires clarification.

Page J1-225

- Section 5.7.15 Station Area Parking references the interim period when no parking would be provided at the South Federal Way Station so ridership would shift to other modes of access including more demand for pickup/drop-off spaces, however how can this be accomplished without any parking being provided at the station? Additionally, this section references some potential for spillover from the 500-space parking facility but does not mention that spillover would likely be even higher when the parking facility is not yet constructed.

- Section 5.7.16 Interim Terminus states that 500 parking spaces would be provided for the interim terminus at South Federal Way. In this condition, would the 500 parking spaces be provided immediately, or would it still be 3 years after opening?

Page J1-246

- Section 6.8.2 Federal Way Segment indicates that construction worker parking along the alignment through the Federal Way Segment would be on local streets only, however on street parking is very limited within Federal Way and it is not clear how that could occur for large portions of the project adjacent to arterial roads. Parking for construction workers shall be provided in a designated area outside the City right-of-way.

Page J1-247

- In section 6.8.3 South Federal Way Segment impacts to parking at Walmart for construction staging as well as permanent impacts to parking are noted – It is not clear how impactful this would be to Walmart's operations. Has existing parking occupancy been evaluated?

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- Section 6.8.3 South Federal Way Segment indicates that construction worker parking along the alignment through the Federal Way Segment would be on local streets only, however on street parking is very limited within Federal Way and it is not clear how that could occur for large portions of the project adjacent to arterial roads. Parking for construction workers shall be provided in a designated area outside the City right-of-way.

Page J1-259

- Section 9.1 Regional Facilities and Travel references the WSDOT Triangle project which was suspended in 2023. Please indicate what impacts might be expected if the project is not complete prior to construction of the Tacoma Dome Link Extension.

The following represents comments from the Community Development and Economic Development Departments:

1. Parking

- The provision of surface parking is inconsistent with the City's recently-approved South Station Sub-area Plan and zoning code. This inconsistency is unmitigable.
- It is unclear if the EIS has adequately evaluated impacts to the local street network and nearby properties due to the lack of parking for a 3-year period. The city believes there will be traffic and parking impacts on private properties that require evaluation and potential mitigation.
- The DEIS needs to evaluate additional properties in the area that could provide required and needed parking during the use of the station and for construction worker parking and staging during construction. Project plans will need to include these additional properties, and it is apparent these impacts have not been included in the DEIS.

References:

ES.1: Pages ES-3 & 4 (PDF Pg 18 of 62), last sentence of page.

ES.3.2: Page ES-9 (PDF Pg 24 of 62), fourth bullet and end of paragraph at bottom of page.

ES.3.2.2: Page ES-16 (PDF Pg 31 of 62), last portion of the 2nd paragraph.

DEIS Page i (PDF Pg 5 of 607), Fact Sheet/Dates of Const. & Opening, last paragraph of page.

DEIS 2.1.2: Page 2-10 (PDF Pg 94 of 607), bottom half of page.

DEIS 4.1.3: Page 4.1-4 (PDF Pg 204 of 607), first paragraph of page.

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2. Weekend closures on SR 99

a. Weekend closures are not mentioned elsewhere in the DEIS.

b. The DEIS must discuss the reasons/need for, and the impacts that would result from, such closures. In addition, the DEIS must demonstrate how these impacts would be mitigated.

Reference:

ES.3.2.2: Page ES-19 (PDF Pg 34 of 62), columns 4 & 6 of 2nd line of Table ES-3.

3. Emergency Housing Impacts or Displacement

The City is concerned that impacts on the Red Lion Hotel/King County Emergency Shelter, and the associated mitigation measures have not been fully identified and evaluated.

a. The impacts of Sound Transit's acquisition of this hotel cannot be mitigated without replacement, as this is the City's Only Emergency Shelter.

b. The DEIS needs to explore modifications to design options that do not require full acquisition. If there is not a full take, analysis and mitigation needs to be provided for the track being placed proximate to this residential facility. It is unclear why use of the Emergency Shelter site is needed for construction staging and seems to disproportionately impact people who are already significantly impacted.

References:

DEIS 4.1.3: Page 4.1-3 (PDF Pg 203 of 607), Table 4.1-1, Note 5.

DEIS 4.1.3: Page 4.1-5 (PDF Pg 205 of 607), Table 4.1-2, Note 3.

DEIS 4.1.3: Page 4.1-7 (PDF Pg 207 of 607), 2nd Paragraph.

DEIS Fig. 4.4-3 Social Resources.

DEIS Page 4.4-15 to 16

DEIS Table 4.4-3

DEIS Table 4.14-4 Other Public Service Providers.

DEIS Page 4.14-17

Appendix F (Conceptual Design Drawings): PDF Pages 24, 218, & 236.

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4. Residential Displacement

a. It is not clear where the 17 residential displacements in Table ES-3 would occur, and how these impacts would be mitigated.

b. The Design Option mentioned in DEIS Subsection 2.1.2.1, and depicted on Figure 2-10, would require the removal of additional homes in Belmor. The additional impacts of residential displacement for the Design Option need to be evaluated and mitigated in the DEIS and compared to the impacts of the Preferred FW Enchanted Parkway option.

c. Table 4.1-1: The locations of the Residential Units Displaced by the Preferred FW Enchanted Parkway with Design Option Alternative, and the SF 99-West Alternatives are not clear. The locations need to be specified in the DEIS.

References:

ES.3.2.2: Page ES-19 (PDF Pg 34 of 62), columns 4 & 5 of 4th of Table ES-3.

DEIS 2.1.2.1: Page 2-13 (PDF Pg 97 of 607), Federal Way Segment and Figure 2-10.

DEIS 4.1.3: Page 4.1-3 (PDF Pg 203 of 607), Table 4.1-1.

5. Residential Displacement: Crosspointe

The City is concerned that impacts to the CrossPointe Apartments, and the associated mitigation measures, have not been fully identified and evaluated.

a. The loss of (and/or adverse impact on) affordable housing units at CrossPointe Apartments could be difficult to replace and/or mitigate.

b. Discussion about the South Federal Way Segment identifies Below Market Rate Housing, which is not a defined term.

c. Six Social Resources are located in the South Federal Way Segment Study Area. Crosspointe is inconsistently and inadequately analyzed relative to the impacts to it:
   - DEIS Fig 4.4-3 and Appendix C, Figure C3-10, show Crosspointe as a Social Resource.
   - DEIS Pg 4.4-15 incorrectly states Crosspointe is not a Social Resource.
   - Table C6-1 identifies displacements, including Crosspointe. However, the mitigation is relocation and vague references to the remainder of the DEIS.

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d. The DEIS does not addresses the impacts of removing small amounts of existing Below Market Rate Housing within walking distance to the station.

e. Appendix J, SF Enchanted Parkway Alternative: Bullet 4 on Pg J2-4 does not analyze the alternative that impacts Crosspointe by removing a significant landscape screen; and also does not analyze the impacts of placing aerial track through and above Crosspointe Apartments. Thus, it is not possible to conclude that the impacts would result in a medium to low change.

f. Appendix J, Table J2-1, states that the SF Enchanted Parkway Alternative "would not substantially reduce intactness to the varied built environment along Enchanted Parkway." Yet is it also states: "It would reduce intactness for residents adjacent to the parkway …." and the landscape is described as not being "substantially impacted…". These descriptions are inconsistent and incorrect.

g. As a Social Resource in the Study Area and within walking distance to the station, impacts to CrossPointe must be analyzed and mitigated, but preferably avoided.

   1. The heavily-landscaped buffer along Crosspointe's entire eastern edge would be removed; yet the DEIS does not discuss these impacts and how they would be mitigated.
   2. Figure J2-6, in Appendix J does not include a visual analysis of the impacts to Crosspointe, and instead focuses on the I-5 station with views away from Crosspointe.
   3. Observation Point 11 looks at SF I-5 station and not SF Enchanted Way's track alignment. The heavily-landscaped eastern edge of Crosspointe is visible in the images of Observation Point 11 (Fig J2-14) but its impacts are not analyzed.
   4. Appendix J does not identify Crosspointe by name and does not include any analyses of the project impacts on the apartments.
   5. Of the six existing social resources in the Study Area, only Park 16 and Crosspointe are within the nonmotorized walking distance of 1 mile from the station. The impacts to the residential resources within walking distance of the station by removing existing housing from Crosspointe are not sufficiently analyzed.

References:

DEIS 4.4.2.1: Page 4.4-5 (PDF Pg 207 of 607), Fig. 4.4-3 Social Resources.

DEIS 4.4.3.2: Page 4.4-13 (PDF Pg 262 of 607), Table 4.4-3.

DEIS 4.4.3.2: Page 4.4-15 & 16 (PDF Pg 264 & 265 of 607), S. FW Segment/CrossPointe Apartments.

DEIS 4.14.2.6: Page 4.14-12 (PDF Pg 470 of 607), Table 4.14-4 Other Public Service Providers.

DEIS 4.14.3.2: Page 4.14-17 (PDF Pg 475 of 607), South Federal Way Segment.

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DEIS 4.14.3.3: Page 4.14-19 (PDF Pg 477 of 607), South Federal Way Segment.

Appendix C, Environmental Justice Technical Report.

Appendix J, Visual and Aesthetic Resources Background and Simulation Analysis.

6. Impacts on Business Community

General Comment:

It is not possible to comment on the impacts to the business community in a meaningful way, as the DEIS does not include any data, and no sourcing of data has been provided. Furthermore, the DEIS does not include any analyses, and no mitigation plan is provided for issues presented. Nor does the DEIS mention if, or when, a deeper analysis will be completed that might include a mitigation plan. The following items demonstrate this:

Economic Effects/Financial Impacts:

a. There is no data or analysis on the financial effects over the time horizon of the project on the impacted businesses (both in the rail zone and the construction laydown zone). Individual businesses have not been identified in the context of a greater analysis, which would include the identification of which industries would or could be lost to the city, lost revenue projections for the city, and a discussion of mitigation of impacts on both impacted businesses and the city's economy.

b. The DEIS does not evaluate the project's impacts on revenue generation for the City, and how the project would mitigate these impacts. The revenue generated from construction is commented on, but there is no comparison of that revenue vs how much is projected to be lost.

c. Nor is there any clarity or detail on how construction affects Federal Way economically (i.e., how many workers would stay in Federal Way as opposed to other cities - and for how long? Would workers live in extended stay hotels and contribute to the City's economy in an impactful way?)

d. The financial figures provided are not clear. Are they in today's value of money or future value of money? This can have serious financial implications that need to be evaluated in the DEIS.

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Parking:

a. There is no analysis of how the project's impacts on parking will impact local business. If commuters have limited parking, they will occupy parking around the station that is for business use on a daily ongoing basis. What is the mitigation plan for these impacts?

b. Additionally, with parking construction delay, how will the above be addressed?

c. Given property acquisition may be more than 5 years off, there are impacts to existing businesses expected to be taken as part of property acquisition. This 5-year delay in certainty is an impact on existing businesses that has not been evaluated in the DEIS.

Property acquisition process:

a. There is high level presentation of property acquisition in other appendices; but no data, financial analyses, or clear definitive acquisition and mitigation process is provided.

Construction laydown areas:

a. Will businesses in construction laydown areas be treated the same as businesses whose properties are directly purchased due to being along the track line? The DEIS needs to provide details on the mitigation plan that would be implemented for temporary and/or partial acquisitions.

b. What is the plan for this land after construction laydown?

References:

ES.3.2.2: Page ES-19 & 20 (PDF Pgs 34 & 35 of 62), Table ES-3.

ES.4: Page ES-36 (PDF Pg 51 of 62).

DEIS 4.3.2: Affected Environment, Page 4.3-1 (PDF Pg 234 of 607).

DEIS 4.3.3: Impact of Acquisitions & Displacements on Tax Base, Page 4.3-8 (PDF Pg 241 of 607).

DEIS 4.3.3: Avoidance and Minimization of Construction Impacts, Page 4.3-14 (PDF Pg 247 of 607).

DEIS 4.4.2.2: South Federal Way Segment, Pages 4.4-10 & 11 (PDF Pg 259 of 607).

DEIS 4.4.3.1: No-Build Alternative, Page 4.4-12 (PDF Pg 261 of 607).

Appendix H 2.1, 2.2, & 2.3: Pages H1-108 through H1-110 (PDF Pgs 111 - 113).

7. Use of Wetlands

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a. It should be noted that the cited 6.31 Acres of impacted property contains several deed restrictions that may be difficult or impossible to remove. The DEIS needs to consider these deed restrictions, and how the related constraints on the use of those properties might be overcome/resolved. If further analysis indicates that it is not likely that these restrictions can be resolved, the feasibility of the "SF 99 West" Alternative may need to be reconsidered.

b. The DEIS does not fully delineate and assess the impacted wetlands associated with each of the project Alternatives. The information provided related to wetlands and other critical areas is extremely vague and does not allow City staff to provide meaningful review and comment.

c. Wetlands need to be mapped and included in the DEIS. The document states that there are fewer long term impacts to FW Enchanted Pkwy wetlands. However, those are the most significant wetlands in the City. The DEIS and ultimate selection of a Preferred Alternative, needs to analyze ways in which these impacts can be avoided, then minimized, and finally the extent to which they can be mitigated.

Reference:

ES.3.2.2: Page ES-19 (PDF Pg 34 of 62), 4th column of 4th line of Table ES-3.

8. Interim Terminus for TDLE

a. The DEIS does not appear to evaluate the impacts of using the South Station as an Interim Terminus, and how those impacts would be mitigated.

Reference:

ES.3.2.5: Page ES-34 (PDF Pg 49 of 62).

9. Elevated track guideways

a. As proposed, it appears almost all (if not all) alternatives would at least partially use existing City right-of-way, so references to all alternatives operating in exclusive right-of-way are incorrect.

b. The under-utilization of areas under elevated track guideway will create dead-zones. The adverse impacts of these void spaces need to be evaluated in the DEIS. The evaluation should look at the area within the South Station sub-area plan and outside of the sub-area plan as two distinct areas.

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Reference:

DEIS 2.1.1: Page 2-2 (PDF Pg 86 of 607), Components of Build Alternatives.

10. Lack of detail and information relating to Alternatives

a. There is a lack of detail and information on all of the figures (Figs 2-12, 2-14, 2-16, 2-18, 2-20) for the different Alternatives making it unclear as to exactly what components will be present onsite, and therefore making it difficult for the community to determine the impacts associated with each Alternative's location and design. This includes unlabeled cream-colored boxes on Figs 2-12, 2-14, 2-16 and undefined shapes in green and cream in Figs 2-18, 2-20. The addition of legends, labels and/or call-outs would provide some clarification.

b. Project staging areas and potential future Transit-Oriented Development (TOD) Parcels are also missing from evaluation in the DEIS.

c. All of the potential future station locations, except for the I-5 station, are located in the South Station Sub-Area Plan. However, Station Alternatives shown in these figures (for example, Figure 2-18) do not appear to take into consideration the goals and policies in the plan.

Reference:

DEIS 2.1.2.2: Page 2-16 through 2-20 (PDF Pg 100-104 of 607).

11. Comprehensive Plan Designations and Subarea Plan

a. The DEIS states that plans adopted after the DEIS is issued will be addressed in the FEIS. Both the City's 2024 Comprehensive Plan and South Station Subarea Plan were adopted or approved in December 2024. Therefore, the impacts and mitigations relative to the plans, goals, and policies in those documents must be incorporated into the FEIS.

Reference:

DEIS 4.2.2.2: Page 4.2-2 (PDF Pg 213 of 607), South Federal Way Segment.

b. Figures 4.2-1, 4.2-3 need to be revised to reflect the changes made to the Land Use Designations for property on and around the station sites as a result of the 2024 Comprehensive Plan Update. Note that other figures may also need to be updated to reflect current Comprehensive Plan Land Use Designations.

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Reference:

DEIS 4.2.2.2: Pages 4.2-3 & 4.2-5 (PDF Pages 214 & 216 of 607).

12. Construction Impacts

This subsection states that: "The analysis of construction impacts also considers temporary changes in noise, air emissions, visual conditions, and transportation. During construction, some nearby businesses and residents may experience hardships. Proximity and construction impacts for adjacent properties, however, were considered based on the findings of other environmental analysis, including TDLE's practices to avoid impacts as well as to reduce them through minimization measures and the mitigation proposed for these other environmental topics".

a. This subsection lists some of the potential impacts caused by construction. However, details/specifics relating to those are limited. The DEIS needs to identify and evaluate all impacts to existing uses, including parking stall and/or loading zone displacements; business disruptions; and, removal of adjacent occupied properties. The project shall not result in any nonconformities with code.

b. Given that the analyses of potential impacts have been conducted at such a high level in this DEIS that specific impacts (and their severity) cannot be adequately identified and analyzed at a sufficient level of detail to identify what mitigation measures will be needed and if mitigation is even possible; future environmental review may be required.

Reference:

DEIS 4.2.3.3: Page 4.2-18 (PDF Pg 229 of 607).

13. Tree Canopy Impacts

a. The I-5 and Pacific Hwy corridors in Federal Way consist of significant asphalt surfacing and have been surveyed to be portions of the city will the smallest tree canopy. If this existing disparate impact is worsened by construction of TDLE, it needs to be addressed and mitigated. Removal of trees within the project corridor will have a negative impact on the City's urban heat index and citywide tree canopy coverage. These impacts need to be evaluated and compared between the different Alternatives and mitigation needs to be identified and included as part of the project.

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b. No analysis or information is provided related to the City's canopy goals as outlined in the City's 2024 Comprehensive Plan (CH 10). The Comprehensive Plan requires preserving tree density, and improving tree canopy. The DEIS needs to include a mitigation plan that will comply with the goals and policies of the Comprehensive Plan.

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Please reach out to either of us or Kent Smith if you have any questions regarding the comments in this letter.

Sincerely,

Digitally signed by EJ Walsh
DN: C=US, E=ej.walsh@cityoffederalway.com, O=City of Federal Way, OU=Public Works Director, CN=EJ Walsh
Date: 2025.02.10 16:50:37-08'00'

EJ Walsh, P.E.
Public Works Director

Keith Niven, AICP, CEcD
Community Development Director

cc: Jim Ferrell, Mayor
Federal Way City Council
Kent Smith, Sound Transit Liaison

Attachment: Supplemental Executive Summary Comments
Supplemental Environmental Impact Statement and Appendix A Comments
Supplemental Appendix D Comments
Supplemental Appendix F Comments
Supplemental Appendix J1 Comments
Supplemental Appendix J4 Comments

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Jim Ferrell, Mayor

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Supplemental Executive Summary Comments

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00 TDLE DEIS Executive Summary.pdf Markup Summary

2 (1)

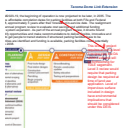
Subject: Highlight
Page Label: 2
Author: hbosak
Date: 12/16/2024 10:19:37 AM
Status:
Color:
Layer:
Space:

informs Tribes, the public, agencies, and decision makers about the alternatives and environmental consequences of building and operating the Tacoma Dome Link Extension from the City of Federal Way in King County to Tacoma in Pierce County

19 (2)

Subject: Cloud+
Page Label: 19
Author: kniven
Date: 12/11/2024 11:45:45 AM
Status:
Color:
Layer:
Space:

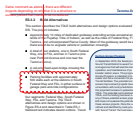
Consistencies w/ City Code?



Subject: Callout
Page Label: 19
Author: hbosak
Date: 12/31/2024 10:07:19 AM
Status:
Color:
Layer:
Space:

This level of project requires at min a level 3 review plus the DA which I assume will be forthcoming for TDLE segement. Level 3 review would require that parking design be required at time of land use application. Level of impervious surface included in design have environmental implications that should be considered under this DEIS.

24 (1)



Subject: Cloud+
Page Label: 24
Author: kniven
Date: 12/11/2024 1:19:59 PM
Status:
Color:
Layer:
Space:

Same comment as above - there are different impacts depending on whether it is a structure or surface parked that needs to be considered

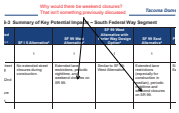
34 (3)

Subject: Cloud+
Page Label: 34
Author: kniven
Date: 12/11/2024 2:00:00 PM
Status:
Color:
Layer:
Space:

The missing piece is revenue generation for City.

Subject: Cloud+
Page Label: 34
Author: kniven
Date: 12/11/2024 2:04:27 PM
Status:
Color:
Layer:
Space:

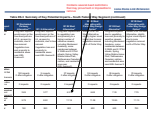
Where are these?



Subject: Callout
Page Label: 34
Author: EJ Walsh
Date: 12/30/2024 3:28:07 PM
Status:
Color:
Layer:
Space:

Why would there be weekend closures? That isn't something previously discussed

35 (1)



Subject: Callout
Page Label: 35
Author: EJ Walsh
Date: 12/30/2024 3:29:34 PM
Status:
Color:
Layer:
Space:

Contains several deed restrictions that may prove hard or impossible to remove

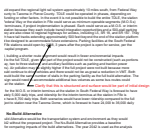
49 (3)

Subject: Cloud+
Page Label: 49
Author: kniven
Date: 12/11/2024 2:08:30 PM
Status:
Color:
Layer:
Space:

What?

Subject: Cloud+
Page Label: 49
Author: kniven
Date: 12/11/2024 2:09:51 PM
Status:
Color:
Layer:
Space:

The impacts of this need to be evaluated



Subject: Callout
Page Label: 49
Author: EJ Walsh
Date: 12/30/2024 3:31:21 PM
Status:
Color:
Layer:
Space:

Clarify that this is structured and surface would be part of initial design

Subject: Cloud+
Page Label: 51
Author: kniven
Date: 12/16/2024 7:53:25 AM
Status:
Color:
Layer:
Space:

what about temp impacts to businesses during construction?

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www.cityoffederalway.com
Jim Ferrell, Mayor

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Supplemental Environmental Impact Statement and Appendix A Comments

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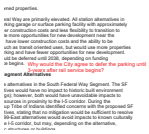
01 TDLE Draft Environmental Impact Statement and Appendix A.pdf Markup Summary

5 (1)

Subject: Cloud+
Page Label: 5
Author: kniven
Date: 12/16/2024 8:17:33 AM
Status:
Color:
Layer:
Space:

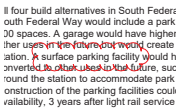
Needs evaluation

45 (2)



Subject: Text Box
Page Label: 45
Author: ColeElliott
Date: 12/6/2024 9:23:52 AM
Status:
Color:
Layer:
Space:

Why would the City agree to defer the parking until 3-years after rail service begins?



Subject: Cloud
Page Label: 45
Author: hbosak
Date: 1/2/2025 1:51:07 PM
Status:
Color:
Layer:
Space:

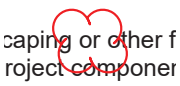
Surface parking would have greater environmental impacts than a garage and is not aligned with FW comprehensive plan development goals.

63 (1)

Subject: Cloud
Page Label: 63
Author: hbosak
Date: 1/2/2025 4:42:18 PM
Status:
Color:
Layer:
Space:

Not providing a parking facility to serve the stations at the start of service will spread emissions more vastly throughout nearby communities as people will search for local neighborhood streets for parking near the station. This should be more adequately assessed.

65 (2)



Subject: Cloud
Page Label: 65
Author: hbosak
Date: 1/2/2025 4:48:57 PM
Status:
Color:
Layer:
Space:

and / or seems more appropriate here

Subject: Cloud
Page Label: 65
Author: hbosak
Date: 1/2/2025 4:51:48 PM
Status:
Color:
Layer:
Space:

More specific mitigation measures seems more appropriate. These seem very high level.

---

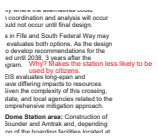
68 (1)

Subject: Cloud
Page Label: 68
Author: hbosak
Date: 1/2/2025 5:11:53 PM
Status:
Color:
Layer:
Space:

To KN's point, this aspect of analysis is lacking assessment of the loss of much needed emergency housing at 16th/348th.

---

72 (1)

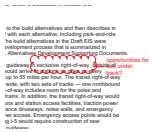


Subject: Text Box
Page Label: 72
Author: ColeElliott
Date: 12/6/2024 2:12:05 PM
Status:
Color:
Layer:
Space:

Why? Makes the station less likely to be used by citizens.

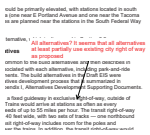
---

86 (2)



Subject: Cloud+
Page Label: 86
Author: kniven
Date: 12/16/2024 8:51:33 AM
Status:
Color:
Layer:
Space:

opportunities for use under track?



Subject: Callout
Page Label: 86
Author: EJ Walsh
Date: 12/30/2024 3:46:39 PM
Status:
Color:
Layer:
Space:

All alternatives? It seems that all alternatives at least partially use existing city right of way as proposed

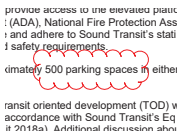
---

87 (1)

Subject: Callout
Page Label: 87
Author: EJ Walsh
Date: 12/30/2024 3:47:27 PM
Status:
Color:
Layer:
Space:

Does not appear to be exclusive...

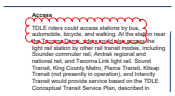
88 (1)



Subject: Cloud
Page Label: 88
Author: hbosak
Date: 1/6/2025 1:56:08 PM
Status:
Color:
Layer:
Space:

A parking study should be required based on the issues associated with parking at other stations.

89 (1)



Subject: Cloud
Page Label: 89
Author: hbosak
Date: 1/6/2025 2:02:11 PM
Status:
Color:
Layer:
Space:

To provide adequate response/questions related to environmental impacts aspects more data pertaining to current rider station access should be provided.

94 (2)

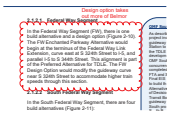
Subject: Cloud+
Page Label: 94
Author: kniven
Date: 12/16/2024 9:35:15 AM
Status:
Color:
Layer:
Space:

Impacts need to be evaluated

Subject: Callout
Page Label: 94
Author: marisfry
Date: 1/21/2025 3:40:59 PM
Status:
Color:
Layer:
Space:

Need to understand how much parking would be provided under this condition.

97 (1)



Subject: Cloud+
Page Label: 97
Author: kniven
Date: 12/16/2024 9:38:45 AM
Status:
Color:
Layer:
Space:

Design option takes out more of Belmor

100 (2)

Subject: Cloud+
Page Label: 100
Author: kniven
Date: 12/16/2024 9:41:54 AM
Status:
Color:
Layer:
Space:

what is this?

Subject: Cloud
Page Label: 100
Author: hbosak
Date: 1/6/2025 2:18:13 PM
Status:
Color:
Layer:
Space:

Surface parking is not an environmentally prudent way to develop the needed parking - greater impacts on energy demand, environmental degradation, spread of GHG, social/neighborhood impacts. This option is also not aligned with the City's long range development goals.

103 (2)

Subject: Cloud+
Page Label: 103
Author: kniven
Date: 12/16/2024 9:43:11 AM
Status:
Color:
Layer:
Space:

Need a building pad at the corner

Subject: Callout
Page Label: 103
Author: EJ Walsh
Date: 12/30/2024 3:50:48 PM
Status:
Color:
Layer:
Space:

The city has previously provided feedback that this would need to be restricted access (right in/right out) if at all permissible. Does not appear that was picked up

104 (1)

Subject: Cloud+
Page Label: 104
Author: kniven
Date: 12/16/2024 9:46:53 AM
Status:
Color:
Layer:
Space:

is unbuilt space for TOD? Slide garage to east or west to maximize developable area

128 (1)

Subject: Callout
Page Label: 128
Author: EJ Walsh
Date: 1/2/2025 1:46:48 PM
Status:
Color:
Layer:
Space:

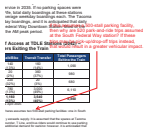
There is no center median in Pac Hwy. This would require ST to widen the road to create this. The City also raised concerns about long term maintenance of this type of configuration.

131 (1)

Subject: Cloud+
Page Label: 131
Author: kniven
Date: 12/16/2024 1:32:59 PM
Status:
Color:
Layer:
Space:

public art?

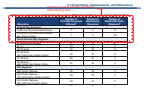
155 (1)



Subject: Callout
Page Label: 155
Author: marisfry
Date: 1/22/2025 2:32:55 PM
Status:
Color:
Layer:
Space:

If this assumes a 500-stall parking facility, then why are 520 park-and-ride trips assumed at the South Federal Way station? If these trips may be pick-up/drop-off trips instead, that would result in a greater vehicular impact.

203 (2)



Subject: Cloud+
Page Label: 203
Author: kniven
Date: 12/16/2024 3:25:43 PM
Status:
Color:
Layer:
Space:

The Design option includes significant more housing units

Subject: Cloud+
Page Label: 203
Author: kniven
Date: 12/16/2024 3:27:11 PM
Status:
Color:
Layer:
Space:

where are these

204 (1)

Subject: Cloud+
Page Label: 204
Author: kniven
Date: 12/16/2024 3:28:16 PM
Status:
Color:
Layer:
Space:

inconsistent w/ S Station Plan

207 (1)

Subject: Cloud+
Page Label: 207
Author: kniven
Date: 12/16/2024 3:35:40 PM
Status:
Color:
Layer:
Space:

Taking out the Red Lion would be an unmitigated impact

213 (2)

Subject: Cloud+
Page Label: 213
Author: kniven
Date: 12/16/2024 4:47:06 PM
Status:
Color:
Layer:
Space:

it's done

Subject: Cloud+
Page Label: 213
Author: kniven
Date: 12/16/2024 4:49:21 PM
Status:
Color:
Layer:
Space:

OMF was rezoned CE

216 (1)

Subject: Cloud+
Page Label: 216
Author: kniven
Date: 12/16/2024 4:50:53 PM
Status:
Color:
Layer:
Space:

outdated - now mixed use

229 (2)

Subject: Cloud+
Page Label: 229
Author: kniven
Date: 12/17/2024 9:41:07 AM
Status:
Color:
Layer:
Space:

super vague -- looks like a "trust us"

Subject: Cloud+
Page Label: 229
Author: kniven
Date: 12/17/2024 9:41:56 AM
Status:
Color:
Layer:
Space:

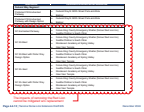
not true

233 (1)

Subject: Cloud+
Page Label: 233
Author: kniven
Date: 12/17/2024 1:20:59 PM
Status:
Color:
Layer:
Space:

Tanja?

262 (1)



Subject: Cloud+
Page Label: 262
Author: kniven
Date: 12/17/2024 3:22:18 PM
Status:
Color:
Layer:
Space:

The impacts of removing the Red Lion cannot be mitigated w/o replacement

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www.cityoffederalway.com
Jim Ferrell, Mayor

Attachment

Supplemental Appendix D Comments

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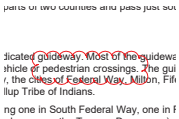
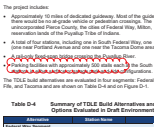
04 TDLE DEIS Appendix D Section 4(f) Evaluation.pdf Markup Summary

10 (2)



Subject: Cloud
Page Label: 10
Author: hbosak
Date: 1/7/2025 11:47:43 AM
Status:
Color:
Layer:
Space:

I assume that this does not include required pedestrian crossings where stations are located.



Subject: Cloud
Page Label: 10
Author: hbosak
Date: 1/7/2025 11:48:45 AM
Status:
Color:
Layer:
Space:

See previous comments. A parking study looking at previous stations should be required.

17 (1)

Subject: Cloud
Page Label: 17
Author: hbosak
Date: 1/7/2025 4:09:07 PM
Status:
Color:
Layer:
Space:

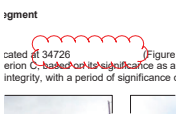
Data collected to make this determination should be provided or at least more in-depth for transparency.

22 (1)

Subject: Cloud
Page Label: 22
Author: hbosak
Date: 1/7/2025 4:20:25 PM
Status:
Color:
Layer:
Space:

The City Planning Division was never included in this discussion.

24 (1)



Subject: Cloud
Page Label: 24
Author: hbosak
Date: 1/7/2025 4:25:23 PM
Status:
Color:
Layer:
Space:

Appears that the report is missing information here.

CITY OF Federal Way
Centered on Opportunity

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253-835-7000
www.cityoffederalway.com
Jim Ferrell, Mayor

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Supplemental Appendix F Comments

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Appendix F comments have been consolodated and will be responded to as a batch.

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www.cityoffederalway.com
Jim Ferrell, Mayor

Attachment

Supplemental Appendix J1 Comments

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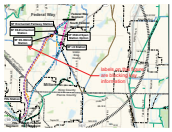
09 TDLE DEIS Appendix J1 Transportation Technical Report.pdf Markup Summary

21 (1)

Subject: Callout
Page Label: 21
Author: marisfry
Date: 12/30/2024 8:22:09 AM
Status:
Color:
Layer:
Space:

Is this saying that projections showed ridership increasing? Or is this an error in the year referenced?

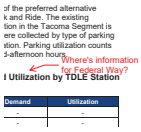
77 (1)



Subject: Callout
Page Label: 77
Author: marisfry
Date: 1/3/2025 10:43:44 AM
Status:
Color:
Layer:
Space:

labels on this figure are blocking key information

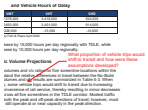
106 (1)



Subject: Callout
Page Label: 106
Author: marisfry
Date: 1/3/2025 12:52:08 PM
Status:
Color:
Layer:
Space:

Where's information for Federal Way?

113 (1)



Subject: Callout
Page Label: 113
Author: marisfry
Date: 1/6/2025 10:17:32 AM
Status:
Color:
Layer:
Space:

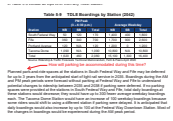
What proportion of vehicle trips would shift to transit and how were these assumptions developed?

115 (1)

Subject: Highlight
Page Label: 115
Author: marisfry
Date: 1/6/2025 10:48:10 AM
Status:
Color:
Layer:
Space:

Source: PSRC Travel Demand Model and Sound Transit Incremental Ridership Model, modified by Fehr & Peers April 2020

125 (2)



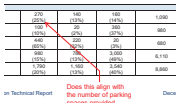
Subject: Callout
Page Label: 125
Author: marisfry
Date: 1/6/2025 11:26:51 AM
Status:
Color:
Layer:
Space:

How will parking be accommodated during this time?

Subject: Callout
Page Label: 125
Author: marisfry
Date: 1/6/2025 11:31:18 AM
Status:
Color:
Layer:
Space:

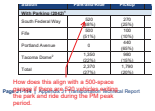
Is there sufficient parking to accommodate this?

126 (2)



Subject: Callout
Page Label: 126
Author: marisfry
Date: 1/6/2025 11:36:22 AM
Status:
Color:
Layer:
Space:

Does this align with the number of parking spaces provided.



Subject: Callout
Page Label: 126
Author: marisfry
Date: 1/16/2025 7:13:40 AM
Status:
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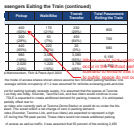
How does this align with a 500-space garage if there are 520 vehicles exiting the park and ride during the PM peak period.

127 (1)



Subject: Callout
Page Label: 127
Author: marisfry
Date: 1/24/2025 1:10:43 PM
Status:
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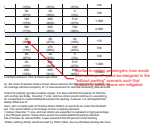
Space:

Where would pick-up/drop-off occur in the "without parking" scenario to ensure that impacts to public space do not occure?

128 (1)



Subject: Callout
Page Label: 128
Author: marisfry
Date: 1/24/2025 1:13:39 PM
Status:
Color:
Layer:
Space:

Similar to exiting passengers, how would pick-up/drop-off space be designed in the "without parking" scenario such that impacts to public space are mitigated.

137 (1)

Subject: Callout
Page Label: 137
Author: marisfry
Date: 1/16/2025 7:45:11 AM
Status:
Color:
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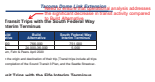
Space:

Conceptual plans addressing this scenario should be provided to understand full site impacts and ability to accommodate such condition.

138 (1)



Subject: Callout
Page Label: 138
Author: marisfry
Date: 1/16/2025 7:46:24 AM
Status:
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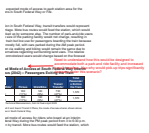
Space:

Need to ensure that operational analysis addresses the significant decrease in transit activity compared to Build Alternative

139 (1)



Subject: Callout
Page Label: 139
Author: marisfry
Date: 1/24/2025 1:22:03 PM
Status:
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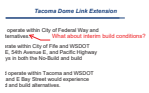
Space:

Need to understand how this would be designed to accommodate both a park and ride facility and increased transit transfers. Also why would pick-up trips significantly decrease under this scenario?

142 (1)



Subject: Callout
Page Label: 142
Author: marisfry
Date: 1/16/2025 7:55:12 AM
Status:
Color:
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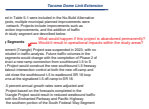
Space:

What about interim build conditions?

143 (1)



Subject: Callout
Page Label: 143
Author: marisfry
Date: 1/16/2025 7:58:13 AM
Status:
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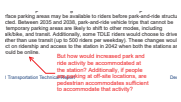
Space:

What would happen if this project is abandoned permanently? Would it result in operational impacts within the study areas?

144 (1)



Subject: Callout
Page Label: 144
Author: marisfry
Date: 1/16/2025 8:01:33 AM
Status:
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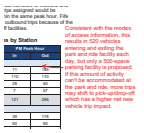
But how would increased park and ride activity be accommodated at the station? Additionally, if people are parking at off-site locations, are pedestrian accommodates sufficient to accommodate that activity?

146 (2)



Subject: Callout
Page Label: 146
Author: marisfry
Date: 1/16/2025 8:06:30 AM
Status:
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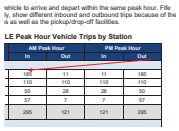
Consistent with the modes of access information, this results in 520 vehicles entering and exiting the park and ride facility each day, but only a 500-space parking facility is proposed. If this amount of activity can't be accommodated at the park and ride, more trips may shift to pick-up/drop-off which has a higher net new vehicle trip impact.



Subject: Arrow
Page Label: 146
Author: marisfry
Date: 1/16/2025 8:05:42 AM
Status:
Color:
Layer:
Space:

150 (1)

Subject: Callout
Page Label: 150
Author: marisfry
Date: 1/24/2025 1:47:07 PM
Status:
Color:
Layer:
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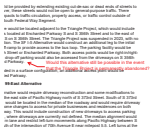
The trip generation is different for the interim scenarios. The trip generation outlined for the interim scenario indicates a lower trip generation for pick-up/drop-off activity; however, the justification for this assumption is not clear.

152 (1)



Subject: Callout
Page Label: 152
Author: marisfry
Date: 1/16/2025 9:17:53 AM
Status:
Color:
Layer:
Space:

Would this alternative still be possible in the event that the Triangle Project is permanently abandoned?

199 (1)

Subject: Callout
Page Label: 199
Author: marisfry
Date: 1/17/2025 5:18:21 AM
Status:
Color:
Layer:
Space:

How do these gaps impact access to the SF I-5 option?

206 (1)

Subject: Callout
Page Label: 206
Author: marisfry
Date: 1/17/2025 5:47:59 AM
Status:
Color:
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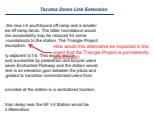
Space:

Would these conditions change under the interim terminus scenario or when the parking facility is not in place?

216 (1)



Subject: Callout
Page Label: 216
Author: marisfry
Date: 1/17/2025 5:43:34 AM
Status:
Color:
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Space:

How would this alternative be impacted in the event that the Triangle Project is permanently abandoned?

226 (2)

Subject: Callout
Page Label: 226
Author: marisfry
Date: 1/24/2025 1:56:17 PM
Status:
Color:
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Space:

This is not an accurate statement. As shown in the conceptual plans and noted below, for many station alternatives there is a bus stop shown in the roadway adjacent to the station, such that transfers would require pedestrian crossings and additional potential for conflicts between different travel modes. It should be confirmed that this was taken into account for the nonmotorized evaluation of build conditions.

Subject: Callout
Page Label: 226
Author: marisfry
Date: 1/17/2025 6:03:28 AM
Status:
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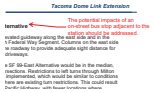
The location of a potential bus stop is not indicated on the conceptual plans. If a bus stop is located south of S 356th Street pedestrians transferring may try to cross mid-block rather than cross at the roundabout due to the added walk distance. This should be considered as part of the station design plan, safety evaluation, and nonmotorized evaluation.

227 (1)



Subject: Callout
Page Label: 227
Author: marisfry
Date: 1/17/2025 6:04:38 AM
Status:
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Space:

The potential impacts of an on-street bus stop adjacent to the station should be addressed.

233 (1)

Subject: Callout
Page Label: 233
Author: marisfry
Date: 1/17/2025 6:14:49 AM
Status:
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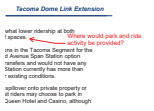
This does not align with the information in the table which indicates no impacts to public parking in the South Federal Way Segment. This requires clarification.

237 (3)



Subject: Callout
Page Label: 237
Author: marisfry
Date: 1/17/2025 6:37:26 AM
Status:
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Where would park and ride activity be provided?

Subject: Callout
Page Label: 237
Author: marisfry
Date: 1/17/2025 6:42:08 AM
Status:
Color:
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Space:

Additional potential for spillover when the parking facility is not yet constructed.

Subject: Callout
Page Label: 237
Author: marisfry
Date: 1/17/2025 6:43:20 AM
Status:
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Space:

Would the 500 parking spaces be provided immediately, or would it still be 3 years after opening?

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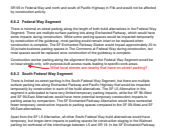
258 (1)



Subject: Callout
Page Label: 258
Author: marisfry
Date: 1/17/2025 3:18:54 PM
Status:
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Layer:
Space:

What local streets are nearby that have on-street parking?

---

259 (2)

Subject: Callout
Page Label: 259
Author: marisfry
Date: 1/17/2025 3:20:35 PM
Status:
Color:
Layer:
Space:

It is not clear how impactful this would be to Walmart's operations. Has existing parking occupancy been evaluated?

Subject: Callout
Page Label: 259
Author: marisfry
Date: 1/17/2025 3:20:42 PM
Status:
Color:
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Space:

What local streets are nearby that have on-street parking?

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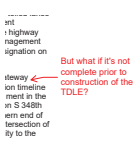
271 (1)



Subject: Callout
Page Label: 271
Author: marisfry
Date: 1/21/2025 3:09:17 PM
Status:
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Space:

But what if it's not complete prior to construction of the TDLE?

CITY OF
Federal Way
Centered on Opportunity

City Hall
33325 8th Avenue South
Federal Way, WA 98003-6325
253-835-7000
www.cityoffederalway.com
Jim Ferrell, Mayor

Attachment

Supplemental Appendix J4 Comments

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13 TDLE DEIS Appendix J4 Ecosystem Resources Technical Report.pdf Markup Summary

21 (1)

Subject: Cloud
Page Label: 21
Author: hbosak
Date: 1/9/2025 9:41:25 AM
Status:
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Space:

Additional/more in-depth details of stream location needed. Stream relocation must provide dimension, pattern and profile of the natural stream and equivalent or better quality than original.

22 (1)

Subject: Cloud
Page Label: 22
Author: hbosak
Date: 1/9/2025 9:50:35 AM
Status:
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Layer:
Space:

Tree replacement will be required for canopy improvements within the city as aligned with city standards and long range goals outlined within the City's Comprehensive Plan.

23 (1)

Subject: Cloud
Page Label: 23
Author: hbosak
Date: 1/9/2025 3:44:48 PM
Status:
Color:
Layer:
Space:

25 (2)

Subject: Highlight
Page Label: 25
Author: hbosak
Date: 1/10/2025 11:37:33 AM
Status:
Color:
Layer:
Space:

Sound Transit would develop a compensatory mitigation plan during the permitting phase

Subject: Highlight
Page Label: 25
Author: hbosak
Date: 1/10/2025 11:37:43 AM
Status:
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Space:

with applicable federal, Tribal, state, and local requirements and guidelines

Subject: Cloud
Page Label: 285
Author: hbosak
Date: 1/9/2025 9:24:10 AM
Status:
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Space:

Additional environmental analysis will be required by both ST and partners when a guideway option has been selected and impacts can be more clearly identified.

February 10th, 2025

TDLE Draft Environmental Impact Statement Comments
c/o Elma Borbe
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

Dear TDLE Team,

Sound Transit (ST) has invited comments on the Draft Environmental Impact Statement (DEIS) for the Tacoma Dome Link Extension (TDLE). I am pleased to respond on behalf of the City of Fife.

Over the past nine years, it has been a privilege to partner with Sound Transit and other agencies in the planning and design of the TDLE. This critical regional infrastructure is necessary for Fife to meet its adopted growth targets, and just as importantly, promote responsible growth patterns in the region to meet the requirements of the Washington State Growth Management Act (GMA) and further the goals and policies of the Puget Sound Regional Council (PSRC) VISION 2050 and the Regional Growth Strategy. Congratulations to Sound Transit on this important milestone!

This letter, together with the below listed enclosures, is a staff technical analysis of the TDLE DEIS, which was reviewed for consistency with Fife's City Center subarea plan and the policy direction in the soon to be adopted 2024 Periodic Update. These comments are not a policy statement by the Fife City Council, and the Council reserves right to advocate for a preferred route alignment, or other various components of the DEIS alternatives, at their discretion in the future.

The City of Fife is entirely located on the Puyallup Tribe of Indians' reservation boundary and coordinates land use actions in accordance the Land Claims Settlement Agreement. The Puyallup Tribe is a sovereign nation, and Sound Transit must coordinate with them as required by various laws and statutes. The City strongly encourages Sound Transit to maintain a strong working relationship with the Puyallup Tribe, protect their cultural resources, promote environmental stewardship, and maintain open and early communication. The City does not speak for the Puyallup Tribe and defers to them on impacts to tribal resources, properties, and other tribal interests.

Of critical importance to the City of Fife is **supporting the preferred station location**, which is the location most **supportive of the City Center subarea plan and Comprehensive Plan**, and maintaining the voter approved provision of **structured parking for the Fife station area**.

The **Fife preferred station location** was identified through close coordination with the City of Fife, the Puyallup Tribe of Indians, and Sound Transit Staff. It was further vetted through public engagement and twice maintained as the "preferred" station location in Fife by the Sound Transit Board. The preferred station location was identified early in the process and remains the preferred alternative due to its consistency with Fife's City Center subarea plan, the Comprehensive Plan, and the coordinated support from stakeholders and numerous agencies. The City of Fife's evaluation of the station area alternatives is detailed in enclosure 2.

Over the past 15 years, the City of Fife has been working to develop a "compact downtown area that is inviting to work, shop, live, and socialize." In 2016, this meant beginning coordination with the Sound Transit scoping process. Parallel with, but separate from, Sound Transit's scoping and DEIS process, the City of Fife has been creating **a City Center subarea plan** to foster "a vibrant commercial and residential district oriented around multimodal connectivity and one that embraces the arrival of the future Sound Transit Link light rail station." The delivery of the TDLE is the driving factor in the City Center subarea plan. Sound Transit and the development of TDLE can support the City Center subarea plan in several ways:

- The station will be an "anchor tenant" and can be a major catalyst to certain principles in the subarea plan, such as the City Center Park and a shared regional stormwater facility. Creating a station area that is accessible, efficient, safe, and complimentary to the goal and polices of the subarea plan is critical to the City Center's future success as a new neighborhood in Fife.
- Turnback property can play a pivotal role in the economic development in and around the station area. It will be critical that Sound Transit be strategic with the size and location of staging areas and the acquisition of property that may be potentially turned back for private development. Allowing larger turnback properties that are within the City Center Core and strategically located will allow for greater economic development opportunities, and more affordable housing within the City Center.
- The "preferred" station area is preferred for a reason. It is most consistent with the City Center subarea plan, outperforms the other station location alternatives, and is supported by numerous stakeholders.
- Multimodal station access improvements will be necessary to ensure equitable access to transit for the current and future residents of Fife and the County.
- Structured parking is critical to efficient land use patterns in the station area. The thought that at some point surface parking will not be needed, and could be available for TOD, is not realistic given the land use patterns and transportation infrastructure in Pierce County.

The City does not agree with the DEIS' approach of considering surface parking an "option" for the station location alternatives in Fife. Surface parking is inconsistent with the soon to be adopted Comprehensive Plan and City Center subarea plan. Setting aside the political dialogue around structured parking, taking the "options" approach fails to recognize or analyze the drastically different impacts from structured parking vs. surface parking, on the City of Fife and its City Center subarea plan.

A comparison of structure parking vs. surface parking appears to only come up in Chapter 4.8, "Water Resources" and only as it relates to impervious surface coverage. Due to the varying nature of impacts from the different parking "options", the following sections, at a minimum, should also consider the different impacts of structured vs. surface parking.

- Chapter 3 – "Transportation Environment and Consequences", in its entirety, does not contain the term "parking structure", nor a comparative analysis of various approaches to parking.
- Chapter 4.2 – "Land Use" does not analyze changes in land use that could occur as a result of a structured parking vs. surface parking.

- Chapter 4.3 – “Economics” does not analyze the potential effects on the local and regional economies that could occur as a result of structure parking vs. surface parking.

The lack of analysis in the DEIS regarding structured vs. surface parking means this critical decision may occur absent adequate information. The conditions in Pierce County are different than other areas along the ST “spine” and reliance on personal vehicles in Pierce County is greater than developed areas in King County. Currently, local transit isn’t sufficient to connect the residents of Pierce County and its cities and towns to major transit infrastructure and many users rely on single occupancy vehicles to get to the station areas. Structured parking is of critical importance to the future TOD potential in the Fife Station area, as well as for consistency with the City’s City Center subarea plan, and the expectations of voters.

In addition to the three main points listed above, there are several other issues worth noting in the DEIS analysis. These are listed below, and additional technical comments can be found in enclosure 1.

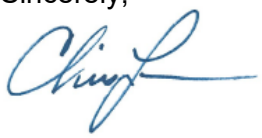
- The Fife Median Alternative on Pacific Highway is not a realistic alternative. Impacts of the Median Alternative are under-represented in the DEIS by stating "there would be no changes to traffic circulation or operations at these intersections", which simply is not true. Specifically, the Median Alternative will:
    - Restrict left turns into and out of driveways and unsignalized driveways.
    - This would increase U-turn volumes at signalized intersections so drivers can access properties on the opposite side of the street.
    - The higher U-turn volumes would increase intersection delays.
    - Delays at the signalized intersections would also be increased because the left turns from Pacific Highway would need to operate with protected only phasing and permissive left turns would not be allowed.
    - The right-turn-on-red movements from the side streets would need to be restricted to accommodate the U-turns.
    - These changes should be accounted for in the transportation analysis for the Median Alternative.
    - A locally created scoring matrix comparing the route alignments through Fife is included in enclosure 3.
- It is not clear how Sound Transit will implement the system access program or non-motorized improvements around the station area. New sidewalks, crosswalks, bicycle facilities, and other non-motorized improvements will be needed to connect the existing street network to the new station. During the "administrative" DEIS, system access projects were included in the DEIS for analysis but have since been removed from the analysis. It is not clear what, if any, non-motorized improvements will be constructed as a function of the TDLE station development in Fife. This is concerning since the system access program appears to be the primary mechanism to avoid adverse impacts to nonmotorized transportation systems. There is even more concern when the DEIS goes on to state “Some of the nonmotorized improvements may be implemented by others such as the Puyallup Tribe of Indians, cities, or others as lead agencies and require multi-agency funding partnerships to implement. Some, but not all, of the system access improvement projects are expected to receive funding.” This still leaves the question of who is constructing non-motorized improvements associated with the station area, and what will be constructed?
- The Washington Department of Transportation (WSDOT) is constructing a substantial project, 30+ years in the making, referred to as the SR 167 Gateway Project. WSDOT has provided detailed approved construction drawings for those stages currently in construction. In addition to completing a critical connection in the state highway system, this project is also constructing a 140+ acre Riparian Restoration Program (RRP) within the Hylebos watershed. The TDLE project area crosses both the freeway and the RRP,

which will be completed before TDLE begins construction. While there is some analysis related to overlapping construction period and cumulative impacts to resources, the DEIS currently lacks the detail to determine how TDLE will be designed to avoid impacts on the new freeway and riparian restoration area. Substantial coordination with WSDOT is needed to incorporate the plans that are currently being constructed.

- The Port of Tacoma is one of the largest freight ports on the west coast, and an international trade hub supporting the economies of Pierce County and the greater region. Protecting freight access to the port is of critical importance during the construction and ongoing operations of TDLE.
    - Substantial mitigation will need to occur during project construction to ensure freight impacts to the port are limited.
    - Alignment design should take into consideration the number of truck trips and the nature of truck maneuvers turning within the project area, during construction, and as a result of the final station and route alignment.
    - The 54th Avenue Station alternatives, together with the ingress/egress from the station area has the potential to greatly impact freight movement traveling along the 54th Avenue corridor and Pacific Highway E corridor.

The City of Fife appreciates the continued coordination with Sound Transit, as well as their ongoing public engagement with the Fife community and the greater region. The TDLE will transform the City of Fife for the next 100 years and Fife is relying on TDLE to meet our growth requirements and regional policy directives. With continued close coordination and careful consideration of local plans and polices, TDLE can help Fife create a new neighborhood in line with our City Center Vision Statement: "The City Center is a vibrant, inclusive, walkable neighborhood that fosters community connections, livability, economic opportunities, and transportation and housing choices."

Sincerely,



Chris Larson, AICP
Community Development Director
City of Fife, WA
(253) 212-5386
clarson@fifewa.gov

Enclosures:

1. Comment Matrix
2. Comparison of Station Alternatives
3. Comparison of Route Alignment Alternatives
4. 100-Year Floodplain in Fife City Center
5. Modified Site Plan – Fife Station Preferred Location
6. I-5 Alignment At-grade Alternative

cc:
Fife City Council
Fife City Manager
Puyallup Tribe of Indians
Fife Community Development
Fife Public Works
Fife Legal Department

City of Fife Comment Matrix: Tacoma Dome Link Extension - Draft Environmental Impact Statement

No.	Document Name	Page #	Topic	Comment	Sound Transit Response
0				**Note: Comments referencing the Executive Summary also apply to the same content in the supporting analyses and technical appendices.**	
1	00-TDLE-DEIS-Executive Summary	ES-22, Paragraph 4	Alignment Alternatives	Paragraph states the median alternative would impact the least number of businesses. Please use the number of employees affected as a more accurate measurement of alternative impacts.	
2	00-TDLE-DEIS-Executive Summary	Table ES-4	Alignment Alternatives	Please define the terms displacement, acquisition, and relocations. It is unclear what the differences are between the alternatives when these terms are summed together.	
3	03-TDLE-DEIS Transportation Environment and Consequences	3-28. Paragraphs 1-2.	Alignment - Median Alternative	The DEIS states that "there would be no changes to traffic circulation or operations at these intersections". The median alternative would restrict left turns into and out of driveways and unsignalized driveways. This would increase U-turn volumes at signalized intersections so drivers can access properties on the opposite side of the street. The higher U-turn volumes would increase intersection delays. Delay at the signalized intersections would also be increased because the left turns from Pacific Highway would need to operate with protected only phasing and permissive left turns would not be allowed. Also, the right-turn-on-red movements from the side streets would need to be restricted to accommodate the U-turns. These changes should be accounted for in the transportation analysis for the Median Alternative.	
4	07a-TDLE-DEIS-Appendix F Conceptual Engineering Drawings 2	A3B-KAP14 to A3B-KAP16	Alignment - Median Alternative	Median alternative restricts left turns along Pacific Highway, except at select intersections. Driveways and unsignalized side streets would be restricted to right-in, right-out access only, and vehicles would need to travel to the next signalized intersection to make a U-turn. These impacts should be described in the impact table ES-4.	
5	07a-TDLE-DEIS-Appendix F Conceptual Engineering Drawings 2	A3B-KAP15	Alignment - Median Alternative	The eastbound left turn from Pacific Highway E to 44th Avenue E appears to have insufficient sight distance for oncoming westbound traffic due to the light rail column in the median. Consider revising the design or column placement.	
6	00-TDLE-DEIS-Executive Summary	ES-25	Alignment - Pacific Alternative and Median Alternative	The Pacific Highway Alternative and Median Alternative would impact the community along Pacific Highway with loss of natural light, shadows, noise, and visual aesthetics of an elevated light rail structure. The table does not include these impacts to properties along this segment of Pacific Highway E on both sides of the street. The I-5 Alternative would have less impacts because there no sidewalks and trails nearby, and there are only impacted properties on one side (north side) of the alignment. Along Pacific Highway, the majority of the businesses have the fronts of their businesses facing Pacific Highway.	
7	00-TDLE-DEIS-Executive Summary	ES-22, Table ES-4	Alignment - Pacific Alternative and Median Alternative	The noise mitigation (noise barriers) are not expected to prevent all noise impacts to Pacific Highway E. The noise impacts of the Pacific Highway E alternatives will be greater than impacts of the I-5 alignment because I-5 is already a generator of noise impacts.	
8	00-TDLE-DEIS-Executive Summary	Table ES-4	Alignment - Pacific Highway Alternative	A significant impact of the elevated light rail structure along Pacific Highway E is the visual impact of loss of natural light, shadows, and visual aesthetics. The table does not include these impacts to properties along Pacific Highway E on both sides of the street.	
9	07a-TDLE-DEIS-Appendix F Conceptual Engineering Drawings 2	A00-KAP15 to A00-KAP16	Alignment - Pacific Highway Alternative	The spuyaləpabš Trail will be located on the south side of Pacific Highway E between the western City limits and Alexander Ave E. There is a sidewalk on the south side between Alexander Ave E and 54th Avenue E. The light rail columns on the south side of Pacific Highway would affect sight distance for vehicles exiting driveways or unsignalized side streets and would increase the potential for vehicle-pedestrian or vehicle-cyclist crashes. EIS should discuss potential impacts to the planned spuyaləpabš Trail and sidewalk along south side of Pacific Highway E.	
10	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-206, 5.5.4.11	Alignment - Pacific Highway Alternative	See comment 9.	
11	00-TDLE-DEIS-Executive Summary	ES-23	Station Alts	DEIS states that ridership is estimated to be the same (2,600 riders) for all station options. The 54th Avenue E Station options is expected to have lower boardings than the Fife Station. The 54th Avenue Stations have less potential for transit oriented development within the walkshed, because nearby properties have higher levels of investment, including the adjacent Prologis Park Tacoma which recently developed 1.7 million square feet of shipping and distribution.	
12	02-TDLE-DEIS Alternatives	2-23 to 2-25	Station Alts	The Fife (Preferred) Station location is the higher performing station location. The Preferred Station location has higher potential for TOD, better pedestrian and bicycle connectivity, better for vehicle and transit operations, and more potential for a City Center Park adjacent to the station. The Preferred Station is consistent with the City Center vision and City of Fife Comprehensive Plan. The 54th Avenue E station options do not provide any advantages over the Preferred Station Location. Please see attached Exhibit titled: Comparison of Fife Light Rail Station Alternatives.	
13	02-TDLE-DEIS Alternatives	2-23 to 2-25	Station Alts	DEIS identifies four future bus routes with 11 busses per hour serving the Fife light rail station. The station site plans for all alternatives include 6 large bus stops, 1 small bus stop, and 6 bus layover spaces. Please evaluate options to reduce the footprint of bus facilities, including potentially reducing the number of stops and layover spaces. This would provide more space for TOD and reduce barriers to non-motorized access to the station.	
14	02-TDLE-DEIS Alternatives	2-23. Figure 2-24	Station Alts	As part of the City's ongoing update to development regulations, aimed an encouraging TOD around the station area, the city will likely adopt the requirement for high capacity transit station to provide structured parking.	
15	02-TDLE-DEIS Alternatives	2-23 to 2-25	Station Alts	The sidewalks along public streets should include planter strip buffers to separate vehicles and pedestrians.	
16	02-TDLE-DEIS Alternatives	2-25	Station Alts - 54th	Of the 54th Avenue Station options, the City's preference is the Span Option. The Span Option provides better nonmotorized mobility and safety. A significant amount of TOD is expected in the City Center Core, which will generate a high volume of pedestrian activity. A grade-separated, direct access to the station is preferred over an at-grade crossing of 54th Avenue E, a 5-lane arterial with approximately 18,000 vehicles per day and a 35 mile-per-hour speed limit.	
17	02-TDLE-DEIS Alternatives	2-25	Station Alts - 54th	Both 54th Span Station options are more likely to have pedestrians cross through the bus loop when traveling between the station and the parking garage or surface parking area. To improve pedestrian safety, reevaluate station design options to not have a bus loop or a road between the parking area and the station. The plaza in the 54th Non-Span Station option provides a more direct pedestrian connection between the parking area and station.	
18	02-TDLE-DEIS Alternatives	2-24 to 2-25	Station Alts - 54th	Evaluate improved pedestrian and bicycle facilities along 54th Avenue E between 12th Street E and Pacific Highway E. This would connect to the future 54th Avenue shared use trail across I-5 between Pacific Highway E and 20th Street E.	
19	02-TDLE-DEIS Alternatives	2-24 to 2-25	Station Alts - 54th	The 54th Station Alternatives should construct 52nd Avenue E as a public street to the City's design standard and eliminate the construction of a parallel driveway to 12th Street E. At 12th Street E, 52nd Avenue E should align with the existing eastern Prologis Park Tacoma driveway, located 650' west of 54th Avenue E.	
20	02-TDLE-DEIS Alternatives	2-24 to 2-25	Station Alts - 54th	For the 54th non-span options, we recommend providing a non-motorized bridge over 54th Avenue E that would include an elevated connection to the light rail station.	
21	02-TDLE-DEIS Alternatives	2-24 to 2-25	Station Alts - 54th	Recommend providing a curb side load/unload area along 52nd Avenue E or somewhere else within the station for easier access, especially for people with disabilities.	
22	03-TDLE-DEIS Transportation Environment and Consequences	3-28. Paragraph 3.	Station Alts - 54th	The station drawings for the 54th Avenue and 54th Span design options show only a driveway connection on 12th Street E. The 3rd paragraph states that 52nd Avenue E would connect with 12th Street E, which is inconsistent with the station drawings. Please see comment 19.	

23	00-TDLE-DEIS-Executive Summary	ES-23	Station Alts - Preferred	There is no recent and accurate data that the Fife Station is within the FEMA 100-year floodplain. The floodplain analysis uses old 1984 information and has incorrect data. For example, the flooding analysis includes the incorrect assumptions that the Fife Ditch connects to both Hylebos Creek and Wapato Creek. It does not include stormwater infrastructure improvements constructed since 1984. The City of Fife recently conducted a flood analysis of four properties at the Fife Station. The analysis resulted in 3.5 of 4 properties being removed from the 100-year floodplain. Half of the 4th property is still being analyzed and may be removed. The station building/platform for the Fife Station is no longer in the floodplain. Additional floodplain analysis of other properties will be conducted when funds are available. Please revise the floodplain maps and descriptions to reflect the LOMA parcels removed. The attached map shows the updated floodplain. The Fife Station and 54th Avenue Station locations have similar elevations and flood risks. The City of Fife is pursuing a regional stormwater facility north of the Fife Station that would reduce the potential for flooding the Fife Station area.	
24	02-TDLE-DEIS Alternatives	2-23	Station Alts - Preferred	The Fife Station (preferred) site plan includes a street between the parking area and the station, and between some bus stops and the station. The City provided a modified station design that does not have a road between the station and parking and bus stops. This modified design includes a pedestrian plaza between the station and parking garage, improving pedestrian safety and access, and transit efficiency at the station. Please modify the station layout to include these design principles. Please see the attached "Modified Site Plan - Fife Station preferred location".	
25	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-141, Paragraph 5	Station Alts - Preferred	The DEIS states that "bus layovers could occur internally". The circulation for the proposed layout's transit drop-off and loading would result in buses needing to use 59th Avenue Ct E and 12th Street E to access the bus layover areas. For busses to access the layover spots after dropping off at the south side bus stops, they would need exit the station area and use 59th Avenue Court E and 12th Street E.	
26	02-TDLE-DEIS Alternatives	2-23	Station Alts - Preferred	The Fife Station (preferred) site plan includes a dead-end driveway/street that does not connect with the planned City Center street network. Please evaluate options for improving network connectivity and circulation by connecting the station to the future City Center street network, such as 13th Street E and 56th Avenue E. An example of this connection is shown in the attached “Modified Site Plan – Fife Station preferred location”.	
27	02-TDLE-DEIS Alternatives	2-23	Station Alts - Preferred	The City supports that the Fife Station (preferred) site plan locates all of the parking, pick up/drop off area, and bus facilities north of the station. This is consistent with the City Center vision of a Core Area with a City Center Park and mixed-use development south of the station, with auxiliary station facilities located north of the station. In future iterations of the station design, please continue to prioritize the City Center Core vision by preserving the area south of the station for the City Center Park and TOD. Locating parking, pick up/drop facilities, or bus facilities south of the station would a barrier to non-motorized connectivity and a disruption to the urban fabric of the City Center.	
28	03-TDLE-DEIS Transportation Environment and Consequences	3-45. Paragraph 6	Nonmotorized	The DEIS does not describe how non-motorized modes will access the station alternatives. It only states that it will work with jurisdictions to improve access through its System Access Program. The System Access Program only provides funding on a competitive basis and does not guarantee that necessary facilities will be in place at the station's opening. Please provide information on how non-motorized modes will access the station alternatives and identify mitigation improvements.	
29	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-142, Paragraph 1	Nonmotorized	Paragraph states the multiuse path underneath the rail guideway would be included with all build alternatives. This statement is not consistent with Sound Transit's intent in other areas of the EIS.	
30	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-186	Nonmotorized	The analysis does not include the multiuse non-motorized I-5 crossing along the west side of 54th Avenue E between Pacific Highway E and 20th Street E which is included in the I-5/54th Avenue E Interchange Project. The EIS should include the facility in the station analysis and consider potential improvements to connect to this planned facility.	
31	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-196, 5.5.3.3	Nonmotorized	Figure 5-29 shows two segments at LOS E (Alexander Ave E and Frank Albert Road E). The statement in the 4th paragraph states that "no segments would be expected to operate at LOS E" is incorrect.	
32	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-205, 5.5.4.10	Nonmotorized	Light rail will be a generator of bicycle trip demand, but the EIS does not evaluate the adequacy of bicycle facilities to connect potential areas within its "bike shed" to the station. Mitigation could include the Fife Multiuse Path along the alignment which connects to the spuyaʟapabš Trail, and a connection to the west side path on the 54th Avenue E overcrossing of I-5 that would connect the station to bike facilities south of I-5.	
33	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-205, 5.5.4.10, Paragraph 3.	Nonmotorized	Paragraph does not reflect Fife's City Center which will provide high density TOD adjacent to the station area and would not be considered "auto-oriented". Fife's City Center planned action EIS and Comprehensive Plan identify 1,249 new households and 1,015 new jobs in the City Center by 2044. Much of the station's pedestrian activity would be north of I-5 and within the walkshed of the station. Analysis should be revised to reflect future residential and commercial non-motorized trips as it relates to the station area and pedestrian improvements should be identified as mitigation.	
34	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-205, 5.5.4.10, Paragraph 5.	Nonmotorized	Paragraph is not clear. It implies that Sound Transit would construct sidewalks on 59th Avenue Court E and 15th Street E. Please clarify Sound Transit's commitment to constructing sidewalk facilities near its station.	
35	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-205, 5.5.4.10	Nonmotorized	The stations will create pedestrian trips and the DEIS does not evaluate the adequacy of pedestrian facilities or identify primary pedestrian access routes within the "walkshed" of the stations. Please identify pedestrian mitigation actions that would be completed for each station option.	
36	03-TDLE-DEIS Transportation Environment and Consequences	3-36	Traffic	Figure 3-8 does not show the I-5 and Port of Tacoma Road interchange improvements. Please confirm that the interchange improvements are included in the 2042 PM peak hour analysis (Intersections #3 and #4).	
37	03-TDLE-DEIS Transportation Environment and Consequences	3-10. Table 3-5	Traffic	Document does not show how the LOS for stop-controlled intersections is calculated. The reported LOS results are not consistent with the SimTraffic simulation results in Appendix J.	
38	03-TDLE-DEIS Transportation Environment and Consequences	3-29, Table 3-13	Traffic	Table and previous paragraph do not state the year of the analysis. Please add the analysis year.	
39	03-TDLE-DEIS Transportation Environment and Consequences	3-41. Paragraph 6	Traffic	The City of Fife requires no further degradation in traffic conditions if an intersection exceeds the City's LOS D standard. Providing mitigation only at intersections that have more than 10 percent increase in delay is not consistent with the City of Fife requirements.	
40	03-TDLE-DEIS Transportation Environment and Consequences	3-42. Paragraph 1	Traffic	The mitigation proposed for intersection #14 is the modifications for the I-5 and 54th Avenue E Interchange Project. The interchange project should be included in the No Build analysis.	
41	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-131, Paragraph 5	Traffic	The City of Fife has updated its City Center growth projections based on its 2044 PSRC growth targets for both housing and employment. It includes 1,249 new households and 1,015 new jobs in the City Center.	
42	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-142, 5.3, bullet 5	Traffic	The Median Alternative would have significant impacts to traffic circulation and operations. See comment 3.	
43	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-166, Table 5-31	Traffic	There is not a City project to install a traffic signal at 52nd Avenue E and 12th Street E intersection (Intersection 11). A signal at the intersection should be included as mitigation for both 54th Avenue Station Alternatives.	
44	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-166, Table 5-31	Traffic	The 54th Avenue E and I-5 northbound ramps intersection (Intersection 15) has a stop-control, and not uncontrolled as described in the table. This applies to existing and future conditions.	
45	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-168, Table 5-32	Traffic	The 54th Avenue E and I-5 northbound ramps intersection (Intersection 15) has a stop-control, and not uncontrolled as described in the table. This applies to existing and future conditions.	
46	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-167, Table 5-31	Traffic - intersection operations	The increase in vehicle delay at the 62nd Avenue E and Pacific Highway E (SR 99) intersection (Intersection 24) seems high for the Build Alternative for each of the station options. The 59th Avenue Court E is expected to be the primary access for the Fife Station instead of 62nd Avenue E. Please confirm the vehicle trip assignments for each of the Build Alternatives.	

47	03-TDLE-DEIS Transportation Environment and Consequences	3-29, Table 3-13	Traffic - intersection operations	The traffic operations analysis does not provide LOS results for the individual alternatives. The traffic results are different for each alternative. Revise the table to provide LOS results for each alternative to inform the selection of a preferred alternative.	
48	11-TDLE-DEIS Transportation Technical Report - Appendix J	J1-168, Table 5-32	Traffic - intersection operations	Please confirm that the I-5 and Port of Tacoma Road interchange improvements are included in the 2042 PM peak hour analysis (Intersections #3 and #4). See comment 36.	
49	04-TDLE-DEIS-affectedenvironment.pdf	Page 4.2-16	Parking Facilities	This section only briefly discusses the long term impacts of "parking facilities" and does not differentiate between the types of impacts based on the type of parking facility, structures vs. surface. Even though parking is not considered as an "alternative" in the EIS, there needs to be a clear and concise analysis regarding the varying levels of impact to future TOD based on structured parking vs. surface parking.	
50	00-TDLE-DEIS-Executive Summary	ES 1 & ES 4	Structured Parking	The Executive summary calls out structured or surface parking. However, the narrative regarding re-alignment on ES 4 only refers to structured parking. It is unclear what the criteria will be for deciding on structured vs. surface parking.	
51	04-TDLE-DEIS-affectedenvironment.pdf	Section 4.2	Consistency ST 3 Ballot Measure	The Sound Transit 3 voter approved funding package included a 500-stall parking garage at the Fife Station. The option to include surface parking at the Fife station is not consistent with the voter approved ballot measure.	
52	04-TDLE-DEIS-affectedenvironment.pdf	Page 4.2-16	Land Use Impact	Last paragraph on page 4.2-16- Several Fife businesses have commented that continued use on the remaining parcel would in fact be greatly impacted. Car dealers are expected to accommodate specific amount of show vehicles on their property and a set percentage of those must be viewable from their frontage, per manufacturers requirements. All alternatives will limit their ability to meet this requirement and will likely require costly improvements to the site. Many of the dealerships buildings have drive-through maintenance bays and their sites have been laid out for safe and efficiently circulation. All options will require businesses to reassess operations on the site and modify their site and/or operations to maintain safe and efficient movement of business through the site.	
53	00-TDLE-DEIS-Executive Summary	ES-22	Alignment	Please evaluate an I-5 alignment alternative with at-grade tracks between Willow Road E and 34th Avenue E, to reduce visual impacts on freeway-adjacent properties and to reduce project costs. The attached graphic shows the at-grade alternative. Additionally consider if this at-grade alignment alternative could travel underneath/through the embankments for the 34th Avenue E overcrossing of I-5 and the Port of Tacoma Road overcrossing of I-5.	
54	07a-TDLE-DEIS-Appendix F Conceptual Engineering Drawings 2	All alignment pages	Business Impacts	This 10% design does not provide enough detail to adequately determine impacts to car dealerships. It appears emergency access around the buildings may be removed for some of the developments for both the I-5 and Pacific Highway alternatives.	
55	04-TDLE-DEIS-affectedenvironment.pdf	Page 4.11-1	Soil characteristics	The DEIS does not determine the soil infiltration rates or bearing capacity in the project area. This will inherently vary throughout the project area. In Fife, unless you conduct a site specific geotechnical analysis you can only assume 800 psi bearing capacity for structural calculation. Infiltration rates are site specific, generally low, and vary widely across the city. Additional detail on soil characteristics are need to determine how they affect project design, the type of construction methods used for the project and, if not adequately considered during project design, they may affect the opening of TDLE or the long-term operations and safety of the light rail system.	
56	04-TDLE-DEIS-affectedenvironment.pdf	Figure 4.8-3	Wapato Creek	This figures shows a "piped connection" between the Wapato Creek and the Fife Ditch, on the north side of 12th St E. There is not a hydraulic connection between the Wapato Creek and Fife Ditch system.	
57	07a-TDLE-DEIS-Appendix F Conceptual Engineering Drawings 2	D00-KAP08	Staging/Storm	This proposes construction staging to occur in what is already a storm system for the City's I-5 and Port of Tacoma Road Project.	
58	07a-TDLE-DEIS-Appendix F Conceptual Engineering Drawings 2	A3B-KAP17	Staging/Storm	This proposes construction staging to occur in what is already a storm system for the City's I-5 and Port of Tacoma Road Project.	
59	07a-TDLE-DEIS-Appendix F Conceptual Engineering Drawings 2	A3B-KAP15	Storm	This page proposes a stormwater facility to replace an existing fueling station. It is unclear what type of stormwater system will be used, but infiltration may not be wise here.	
60	07a-TDLE-DEIS-appendixf-conceptualengineeringdrawings-1.pdf	A00-KAP13	Noise/Vibration	In addition to noise barriers and sound mitigation that will be installed, there appears to be room to shift the station area further west (100 ft +/-), within the Fife Preferred station area to move track noise from rail "No 10. double crossovers" further away from St Paul's property.	
61	07a-TDLE-DEIS-appendixf-conceptualengineeringdrawings-1.pdf	A00-KAP12 and 13	City Boundary	Please update the City's boundary. https://www.fifewa.gov/221/Annexations an/or or https://data-cityoffife.opendata.arcgis.com/	
62	14a-TDLE-DEIS-appendix-J4-ecosystem-resources-technical-report-1.pdf	Page J4-67	Hylebos Creek	There is no discussion about the WSDOT SR 167 Riparian Restoration Program, which will be completed before construction on TDLE begins.	
63	07a-TDLE-DEIS-appendixf-conceptualengineeringdrawings-1.pdf	A00-KAP11-12	Hylebos Creek	There is no detail regarding the SR 167 Gateway Project and it's Hylebos Riparian Restoration Program (RRP). Please incorporate the approved for construction plans that were provided by WSDOT, and provide design considerations in TDLE to incorporate the WSDOT plans. As shown, TDLE will have large impacts on the freeway construction and environmental restoration that is currently approved, funded, and under construction. Additional analysis, design, and coordination with WSDOT, and the Puyallup Tribe (benefactors and long term owners of the RRP) is critical to ensure TDLE does not create unavoidable adverse impacts to this project.	
64	14c-TDLE-DEIS-appendix-J4-ecosystem-resources-technical-report-3.pdf	Page J4-190	Fife Ditch	Section 4.1.1.4 - Second paragraph - The 54th Avenue Station Alternative tries to avoid piping the Fife Ditch by placing an access road side by side with the City's proposed extension of 52nd Avenue E, which would in fact pipe the Fife Ditch as a function of 54th Station Alternatives.	
65	00-TDLE-DEIS-Executive Summary	Page 1-4	Purpose of project	Many of the issues identified in this comment letter must be addressed in order to fully meet the purpose of TDLE, as identified in ES2.1. Most notably - surface parking does not promote equitable Transit Oriented Development within the station area, and station area configurations that require pedestrians to cross streets to travel between the station platform and parking areas, bus stops, passenger loading areas do not encourage safe and convenient access to the station area.	
66	05-TDLE DEIS-cumulativeimpacts.pdf	Page 5-7	System Access	It is not clear what, if any, non motorized improvements will be installed as a function of the TDLE station development in Fife. Sidewalks, crosswalks, and bicycle facilities will be needed to connect the existing street network to the station. This section implies that a multiuse-path is a potential under the guideway extending west from the station area, but Fife has been told otherwise. During the "administrative" DEIS, the system access projects were being included in the DEIS for review, but have since been removed from the DEIS, leaving local jurisdictions not only on the hook for the funding and construction, but also for the environmental review of all system access projects. This is concerning since the system access plan seems to be the primary mechanism to avoid adverse impacts to nonmotorized transportation systems.	

King County
METRO
Moving forward together

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February 10, 2025

Erin Green
Environmental Manager, South Corridor
Central Puget Sound Regional Transit Authority (Sound Transit)
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Seattle, WA 98104-2826

Dear Ms. Green:

Thank you for providing King County Metro Transit Department (Metro) with an opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Tacoma Dome Link Extension (TDLE) Project. As a participating agency under the National Environmental Policy Act (NEPA), we sincerely appreciate our strong working relationship and collaboration with the Sound Transit TDLE Team through this planning phase of the project. As requested, we are submitting detailed comments in the table format provided by Sound Transit (see Attachment 1).

The purpose of this letter is to formally transmit Metro's comments following our focused review of the Transportation Technical Report (Appendix J1) and Conceptual Design Drawings (Appendix F) and provide an overview of our chief concern: transit integration and circulation into and within the station bus loop and layover area. We look forward to participating in discussions with Sound Transit and the other cooperating and participating agencies in the months ahead to assist in resolving these and other issues as the EIS process proceeds.

Station Transit Integration and Circulation for All Station Alternatives
Based on Metro's review of the station-specific Conceptual Design Drawings in the DEIS for SF Enchanted Parkway & SF I-5 Alternative stations, the drawings have not been updated since the ADEIS, and the newly added SF 99-West and SF 99-East Alternatives contain the same concerning lack of detail in those station site plans. As currently shown, these concept design drawings do not allow for feasible bus movements into and around the off-street facility, potentially impacting Metro's ability to provide service. This includes general circulation within the facility, active bay pull in/pull out, layover ingress/egress, station driveway entry/exit, and conflicts with access to trash enclosures and paratransit pick-up/drop-off areas. All bus pathways – circulating within the facility, accessing active bays and layover, and station driveway ingress/egress – should be tested with AutoTurn software as a preliminary test. Coach tests will need to be performed prior to proceeding past 60% design.

I-5 Station Ingress/Egress
The plan sheets do not show the roundabout that will provide access to the bus loop off South 356th Street. We understand this roundabout will be connected to an I-5 off ramp, indicating high travel speeds from exiting general purpose traffic. We would like to review the design to ensure safe and efficient ingress/egress for Metro and Pierce Transit buses to determine if there are any potential impacts to transit's ability to use the facility.

Station Ingress/Egress
Metro requires signals to make reliable and efficient left turns into and out of any proposed station concept. Metro requests that signals be added into the design and model and that traffic analyses be updated. If a signal cannot be added, then the design is flawed from Metro's perspective.

Park and Ride Impacts
S 320th Park and Ride is owned by WSDOT but is operated and maintained by King County Metro. Metro is interested in more detail about the impacts to the park and ride outside of loss of parking. Metro is interested in extent and duration of closures during construction, as well as any permanent impacts to access or future development of this property.

South Federal Way Park and Ride is also operated and maintained by King County Metro. On Page J1-234, it states that there would be partial or full temporary closures of the park and ride and access would be not possible for extended periods of construction for transit vehicles. Metro is interested in more detail about the impacts to the park and ride, specifically the extent and duration of closures during construction, as well as any permanent impacts to access or future development of this property.

Metro Staff Responsibilities

Gabi Kappes will be the lead participant and main point of contact for Metro. John Greene is responsible for Metro's internal coordination in support of its role as a Participating Agency during the NEPA and SEPA environmental review process. Their contact information is as follows:

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Sincerely,

Michelle Allison
General Manager

Attachment 1. Metro's detailed comments on the TDLE Project DEIS

Attachment 1. Metro's detailed comments on the TDLE Project DEIS

	A	B	C	D	E	F	G	H
1	**TDLE Transportation Technical Report (Appendix J1), and Conceptual Design Drawings (Appendix F)**							
2	**ID**	**Page No.**	**Paragraph No.**	**Type of Comment**	**Station or Segment**	**Impact**	**Name of Commenter**	**Comment**
3	0 - example			Text revision/correction, Impact/mitigation, Techincal, General	South Federal Way	Build, Construcion, N/A		
4		J1-221	4	Impact/mitigation	Federal Way	Construction	Steve Crosley	**S 320th Park and Ride** is stated to be owned by WSDOT, while Metro has operating and maintenance responsibilities. Other than loss of parking there is no statement of actual impact - will the property be closed during construction? For how long? How will the guideway construction affect permanent access? Will the guideway effectively limit development on this property?
5		J1-221	4	Impact/mitigation	Federal Way	Construction	Jennifer Ash	WSDOT owns the property, Metro has operating and maintenance responsibility through an O&M agreement and needs to sign off on any changes to the Park and Ride.
6		C00-KAP05 44 C00-ASP101 48 C00-ASP102 49	Site Plans	Technical	South Federal Way	Build	Steve Crosley	Station site plans (48, 49) cut off right at the northern tip of station area. Track plan and profile (44) does not show any of the implied roadway (WSDOT roundabout). Metro will not be able to review or comment on station ingress/egress until ST develops more expansive and detailed site plans.
7		J1-9	3	Text revision/correction	General	N/A	Steve Crosley	Correct typos in sentence: "Prior to COVID-19 and between 2016 and **2029** Sound Transit ridership increased (Sound Transit 2017, 2019), while King County Metro ridership remained steady (King County Metro 2022), and Pierce Transit ridership experienced a modest decline (Pierce Transit **2019b**)."
8		J1-17	1	General	General	N/A	Steve Crosley	Note section could be misleading since it states "This section inventories and evaluates existing regional and local transit facilities, operations, and services within the study area" and then immedately pivots to regional ridership, which must include CT, all of Seattle, Everett Transit, Ferries, etc. to get that high number. Within the study area ridership is much smaller.
9		J1-17	5	Text revision/correction	General	N/A	Steve Crosley	Metro serves small portions of Pierce and Snohomish counties, in addition to King County What is meant by local and express for Metro? What about RapidRide? STX provides the "express" intracounty service
10		J1-17	6	Text revision/correction	General	N/A	Steve Crosley	Redundant content in second to last and last sentence Replace "Tacoma" with "TDLE"
11		3.1.14.A DEIS Conceptual Engineering Addendum 1 Station Sheets.pdf	Site Plans	Technical	South Federal Way	Build	Steve Crosley	With the exception of SF I-5 it looks like all station alternatives will require new signal(s) to facilitate safe movement of buses into and out of stations. These signals should be included in a revised FEIS traffic analysis.
12		J1-18	Table 4-7	Text revision/correction	General	N/A	Gabi Kappes	Clarify the year in time for the routes that are included at each transit facility
13		J1-18	Table 4-7	Text revision/correction	General	N/A	Gabi Kappes	King County Metro Route 187 is listed twice, remove duplicate
14		J1-18	Table 4-7	Text revision/correction	General	N/A	Gabi Kappes	Route 178 is suspended - remove
15		J1-18-19	3	Text revision/correction	Federal Way Segment	N/A	Jeremy Fichter	This section describes service operating as of 2023. Routes 177/178, 182 and 193 are identified as peak-only routes; however, Route 178 has been suspended since 2020, and Route 182 is an all-day route. PT Routes 500 and 501 also operate in the Federal Way segment.
16		Page J1-103	3	Text revision/correction	General	Build	Gabi Kappes	Correct typos: "The No-Build Alternative also includes construction of new light rail OMFs in south King County as well as other **facility**, transit bus route**s**, and service modifications proposed within each of the local transit agency's long-range plans. "
17		J105	1	General	General	N/A	Jeremy Fichter	Metro Connects was updated in 2021 and now includes two networks: an interim network, and a 2050 network. Metro's South Link Connections project is now under way and will identify recommended changes to be implemented as soon as 2026 on Routes 177, 178 and 193, and other routes in South King County. More information is available at Southlinkconnections.com
18		J107	Figure 5-2	General	Federal Way Segment	N/A	Jeremy Fichter	Add label for SF99-Enchanted Station
19		J1-234	4	Impact/mitigation	Federal Way Segment	Construction	Gabi Kappes	Clarify access to **South Federal Way P&R** during and after construction. On Page J1-234, it states that there would be partial or full temporary closures of park and rides and access would be not possible for extended periods of construction for transit vehicles.. " For extended periods during construction, transit vehicles and riders would not be able to access the South Federal Way Park and Ride from the southern driveway on 23rd Avenue S, where it bends and becomes S 324th Street. "
20		Appendix F - 7a	00-ASP101 **29** 00-ASP102 **30**	Technical	South Federal Way / SF ENCHANTED PARKWAY STATION	Build	Gabi Kappes	Concerned that footprint does not accommodate bus circulation, which could impact Metro's ability to provide service. Some of the bus movements look tight or not achievable. All turning movements will need to be tested with AutoTurn for feasibility. This includes ingress/egress, movement around the bus loop, independent pull in/out at each bay, and layover ingress/egress. This comment is a primary concern for Metro and a potential impact - especially if the station footprint is set/constrained this will affect the interior dimensions for the bus loop, and as currently shown circulation does not look generally feasible.
21		Appendix F - 7a	00-ASP101 **29** 00-ASP102 **30**	Technical	South Federal Way / SF ENCHANTED PARKWAY STATION	Build	Gabi Kappes	Layover areas need 3' walking space between them for driver access/circulation.
22		Appendix F - 7a	00-ASP101 **29** 00-ASP102 **30**	Technical	South Federal Way / SF ENCHANTED PARKWAY STATION	Build	Gabi Kappes	Comfort Station is required for bus operators and is not shown
23		Appendix F - 7a	00-ASP101 **29** 00-ASP102 **30**	Technical	South Federal Way / SF ENCHANTED PARKWAY STATION	Build	Gabi Kappes	Concerned about impact to bus service if trash enclosures are accessed in a way that caused bus/truck conflict
24		Appendix F - 7a	00-ASP101 **29** 00-ASP102 **30**	Technical	South Federal Way / SF ENCHANTED PARKWAY STATION	Build	Gabi Kappes	Paratransit drop off/pick up cannot be located in a transit only area

	A	B	C	D	E	F	G	H
25		Appendix F - 7a	00-ASP101 48 00-ASP102 49	Technical	South Federal Way / SF I-5 STATION	Build	Gabi Kappes	Concerned that footprint does not accommodate bus circulation, which could impact Metro's ability to provide service. Some of the bus movements look tight or not achievable. All turning movements will need to be tested with AutoTurn for feasibility. This includes ingress/egress, movement around the bus loop, independent pull in/out at each bay, and layover ingress/egress. This comment is a primary concern for Metro and a potential impact - especially if the station footprint is set/constrained this will affect the interior dimensions for the bus loop, and as currently shown circulation does not look generally feasible.
26		Appendix F - 7a	00-ASP101 48 00-ASP102 49	Technical	South Federal Way / SF I-5 STATION	Build	Gabi Kappes	Layover areas need 3' walking space between them for driver access/circulation.
27		Appendix F - 7a	00-ASP101 48 00-ASP102 49	Technical	South Federal Way / SF I-5 STATION	Build	Gabi Kappes	Comfort Station is required for bus operators and is not shown
28		Appendix F - 7a	00-ASP101 48 00-ASP102 49	Technical	South Federal Way / SF I-5 STATION	Build	Gabi Kappes	Concerned about impact to bus service if trash enclosures are accessed in a way that caused bus/truck conflict
29		Appendix F - 7a	00-ASP101 48 00-ASP102 49	Technical	South Federal Way / SF I-5 STATION	Build	Gabi Kappes	Paratransit drop off/pick up cannot be located in a transit only area
30		Appendix F - 7a	00-ASP101 48 00-ASP102 49	Technical	South Federal Way / SF I-5 STATION	Build	Gabi Kappes	Please show crosswalks within the bus loop facility
31		Appendix F - 7e	00-ASP101	Technical	South Federal Way /SF 99 - 352ND STATION - East Alt	Build	Gabi Kappes	Paratransit drop off/pick up cannot be located in a transit only area. Should be moved to the pickup/drop-off area on the other side of the station
32		Appendix F - 7e	00-ASP101	Technical	South Federal Way /SF 99 - 352ND STATION - East Alt	Build	Gabi Kappes	Concerned that footprint does not accommodate bus circulation, which could impact Metro's ability to provide service. Some of the bus movements look tight or not achievable. All turning movements will need to be tested with AutoTurn for feasibility. This includes ingress/egress, movement around the bus loop, independent pull in/out at each bay, and layover ingress/egress. This comment is a primary concern for Metro and a potential impact - especially if the station footprint is set/constrained this will affect the interior dimensions for the bus loop, and as currently shown circulation does not look generally feasible.
33		Appendix F - 7e	00-ASP101	Technical	South Federal Way /SF 99 - 352ND STATION - East Alt	Build	Jeremy Fichter	Most of the active bays are adjacent to the Link station, but one is non-adjacent. The most direct walking route between the non-adjacent bay and the rail platform cuts through the bus facility. As the design process progresses, Metro may request treatments to prevent riders from walking through the bus loop.
34		Appendix F - 7e	00-ASP101	Technical	South Federal Way /SF 99 - 352ND STATION - East Alt	Build	Gabi Kappes	Layover areas need 3' walking space between them for driver access/circulation.
35		Appendix F - 7e	00-ASP101	Technical	South Federal Way /SF 99 - 352ND STATION - East Alt	Build	Gabi Kappes	Comfort Station is required for bus operators and is not shown
36		Appendix F - 7e	00-ASP101	Technical	South Federal Way /SF 99 - 352ND STATION - East Alt	Build	Gabi Kappes	Concerned about impact to bus service if trash enclosures are accessed in a way that caused bus/truck conflict
37		Appendix F - 7e	KA00-ASP101	Technical	South Federal Way /SF 99 - ENCHANTED STATION - West Alt	Build	Gabi Kappes	Concerned that footprint does not accommodate bus circulation, which could impact Metro's ability to provide service. Some of the bus movements look tight or not achievable. All turning movements will need to be tested with AutoTurn for feasibility. This includes ingress/egress, movement around the bus loop, independent pull in/out at each bay, and layover ingress/egress. This comment is a primary concern for Metro and a potential impact - especially if the station footprint is set/constrained this will affect the interior dimensions for the bus loop, and as currently shown circulation does not look generally feasible.
38		Appendix F - 7e	KA00-ASP101	Technical	South Federal Way /SF 99 - ENCHANTED STATION - West Alt	Build	Jeremy Fichter	Most of the active bays are adjacent to the Link station, but two are non-adjacent. The most direct walking routes between the non-adjacent bays and the rail platform cut through the bus facility. As the design process progresses, Metro may request treatments to prevent riders from walking through the bus loop.
39		Appendix F - 7e	KA00-ASP101	Technical	South Federal Way /SF 99 - ENCHANTED STATION - West Alt	Build	Gabi Kappes	Layover areas need 3' walking space between them for driver access/circulation.
40		Appendix F - 7e	KA00-ASP101	Technical	South Federal Way /SF 99 - ENCHANTED STATION - West Alt	Build	Gabi Kappes	Comfort Station is required for bus operators and is not shown
41		Appendix F - 7e	KA00-ASP101	Technical	South Federal Way /SF 99 - ENCHANTED STATION - West Alt	Build	Gabi Kappes	Concerned about impact to bus service if trash enclosures are accessed in a way that caused bus/truck conflict
42		Appendix F - 7e	KA00-ASP101	Technical	South Federal Way /SF 99 - ENCHANTED STATION - West Alt	Build	Gabi Kappes	Paratransit drop off/pick up cannot be located in a transit only area. Should be moved to the pickup/drop-off area on the other side of the station

February 10, 2025

RE: Draft EIS Comment - TDLE

Dear Sound Transit Board:

The City of Milton appreciates the opportunity to comment on the Draft EIS and the multiple opportunities the staff and leadership have had to meet with Sound Transit regarding the Draft EIS development.

While we support the overall project, we wish to address several concerns with the alternatives that run through the City of Milton along Pacific Avenue/Highway 99. Both the east and west alternatives have numerous negative impacts on the residents, businesses, and environmentally sensitive critical areas of the City.

The West alternative will displace up to 17 low income residential units and both alternatives will displace up to 25 businesses. Of great detriment is the impacts to 7.33 acres of critical areas, wetlands and the Hylebos Creek.

The City's requests that the Sound Transit Board seriously consider the I-5 alternative. The right-of-way has been previously disturbed during the original construction of the interstate and subsequent road improvements. In addition, an I-5 alignment would have the least impact on Milton residents, businesses, and critical areas.

If the I-5 alternative is not an option, the City requests the SF 99 East (center median) alternative, which would have the next least impact on Milton and would assist in the City's goal of creating a safer corridor for traffic and pedestrians.

Sincerely,

Shanna Styron Sherrill
Mayor

Dustin Madden
Public Works Director

Angelie Stahlnecker
Planning Manager

December 20, 2024

Sound Transit Board of Directors
401 S. Jackson Street
Seattle, WA 98104

Dear members of the Sound Transit Board,

We are writing as members of the Pierce County delegation of the Sound Transit Board of Directors to express our support and appreciation for ongoing planning efforts related to the Tacoma Dome Link Extension project; however, with the release of the newly published DEIS, we would like to highlight some of the nuances of each of our stations. Each future station is surrounded by a unique area and therefore, access to stations must be individualized. Pierce County has been anxiously awaiting this project and its associated station access work and deserves the attention that all other parts of the system have had.

The City of Fife would like to emphasize the need for structured parking at the future South Federal Way and Fife stations. While transit integration is vital to supporting and increasing ridership as the system expands in the South Sound, currently, local transit isn't sufficient. An intentional vision of parking for these stations, particularly one that is consistent with the City of Fife's plans for a city center where the new station will be located, is vital to the success of this area. Structured parking is essential to the City of Fife's plans for its future City Center and consistent with voters' expectations when Sound Transit 3 (ST3) was passed in 2016. In March of 2016, the Sound Transit Board of Directors released a ST3 Draft Plan for public input and hosted the draft plan documents on the ST3 website (soundtransit3.org, no longer accessible) which was linked in ballot materials for the November 2016 General Election, in which ST3 was approved. The draft plan included project details by transit mode and the pages detailing the project elements for the Federal Way Transit Center to Tacoma Dome Light Rail (now referred to as TDLE) explicitly state the plan for "parking garages at the South Federal Way and Fife stations, each with approximately 500 stalls." The expectation of structured parking was further confirmed by the Board's realignment action in 2021 (R2021-05) which specifically refers to structured parking in the statement "As part of the annual program review, identify opportunities and make recommendations to deliver flexible, innovative and affordable methods to get people to transit stations, if structured parking facilities have to be delayed."

At the Tacoma Dome Station, Sound Transit enjoys a partnership with Pierce Transit to deliver both parking and transit access to this major transit hub. Working with the City of Tacoma on access improvements and options, Tacoma envisions a multi-modal center that is easy to get on and off light rail no matter what mode you take. The Portland Avenue Station in Tacoma is now located in the new (to be approved Summer 2025) Seaport Transition TOD Zone, making this station rich with potential to access new development as well as the Puyallup Tribe's Emerald Queen Casino. This area currently has very little housing and it is vital that we create opportunities for nearby neighborhoods to access the station safely.

FIFE WASHINGTON

Pierce County

CITY OF PUYALLUP STATE OF WASHINGTON

CITY OF Tacoma

Recent Board actions that pivot away from adding planned additional parking at the South Tacoma and Lakewood Sounder stations, to instead just implementing "access improvements" (R2024-04 and R2024-05), is another one of the reasons that prompted this letter. While we support and encourage process improvement and the delivery of non-motorized system access projects, we cannot ignore the reality that reliance on personal vehicles in Pierce County is greater than some of our partners further north. The distinct needs of each Pierce County station area must be recognized. The Tacoma Dome Link Extension not only connects Pierce County but also provides access to the Puyallup Tribal Reservation. The needs of these jurisdictions necessitate a different approach to parking than elsewhere in the region. Prior to the COVID-19 pandemic, the existing transit garages in Pierce County were already being utilized to capacity and will experience further strain with the addition of stations lacking dedicated parking designed to serve the needs of Pierce County residents.

The delay of access and parking delivery for the TDLE project from 2030 to 2036 was a necessary, yet unfortunate, outcome of Realignment, but will create strains on existing transit parking infrastructure in Pierce County as light rail service expands here. Pierce County constituents have contributed to regional transit efforts for years and are anxiously awaiting returns on their investment via the thoughtfully planned transit project that has consistently been promised to them.

Delivering TDLE as expediently as possible with project elements responsive to the unique needs of jurisdictions throughout the region is a matter of equity. Access to transit can change lives and the benefits that can be realized through expanded access to a regional system are far-reaching. We remain dedicated to delivering this project and its station access improvements, as discussed in the voter-approved project and realignment action, to Tacoma Dome Link Extension stations with limited delay.

Sincerely,

Bruce Dammeier
Board Member
Finance and Audit Committee Vice Chair
Executive Committee Member

Jim Kastama
Board Member
System Expansion Committee Member

Kim Roscoe
Board Vice Chair
System Expansion Committee Vice Chair
Executive Committee Member
Rider Experience and Operations Committee Member

Kristina Walker
Board Member
Rider Experience and Operations Committee Chair
Finance and Audit Committee Member

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Pierce County

CITY OF PUYALLUP STATE OF WASHINGTON

CITY OF Tacoma

PLANNING & PUBLIC WORKS

2401 South 35th Street, Room 2
Tacoma, Washington 98409-7460

PierceCountyWa.gov/PPW

February 10, 2025

TDLE Draft EIS
c/o Elma Borbe
Sound Transit
401 S. Jackson St. Seattle, WA 98104

Subject: **Pierce County Comments on Tacoma Dome Link Extension (TDLE) Draft Environmental Impact Statement (EIS)**

Dear Mrs. Borbe:

Pierce County appreciates the opportunity to review and comment on the TDLE Draft EIS. The TDLE project would extend the light rail line on a mostly elevated alignment for nearly 10 miles from Federal Way to Tacoma and would also traverse through Milton, Fife and the unincorporated Fife Heights area in Council District 5. The TDLE project is expected to generate an estimated 24,000 to 36,000 daily transit riders. The Draft EIS addresses alternatives involving the rail alignment and the four station locations. Our feedback primarily reflects Pierce County's role in supporting a multimodal transportation system as envisioned in the Pierce County Comprehensive Plan 2024 Periodic Update, and in reviewing and permitting a small portion of the project, at the southern end of the South Federal Way (SF) segment, which falls within unincorporated Pierce County.

Pierce County supports expanding transit connections and would like to encourage alternatives that provide the best multimodal connection opportunities to Pierce County residents. The project's central goal of extending light rail is in line with Pierce County's priorities including planning for growth and affordable housing with convenient access to transit, supporting multimodal transit connections, and equitably serving our community. These goals must be balanced with consideration of how the project could affect regional transportation options for Pierce County residents and natural systems that extend beyond the project site.

Critical Areas

Only a small portion of the southern extent of the 'South Federal Way' segment falls within Pierce County's jurisdiction. Pierce County will consider the following when reviewing permits:

- All three alternatives have impacts to Hylebos Creek, and potential and delineated wetlands.
- Pierce County's critical area ordinances have recently been updated. The amended ordinances will be effective 2/1/2025 and are not yet integrated into the online version of Pierce County Code. Please reference Ordinance 2024-553s2 for adopted language.
- Once the alignment of the light rail has been determined, please ensure appropriate wetland analysis is conducted to identify how many acres of wetland are impacted.

Transportation

- Pierce County supports alternatives that provide safe and convenient multimodal connections to residents and businesses. Pierce County recommends against the alternatives that would limit access for transit riders coming from the unincorporated County, who must connect to light rail with additional modes of transportation:
- The SF I-5 station alternative has more limited access for active transportation and transit.
- Deferring parking lot construction until 2038 will limit access in the intervening years and could also contribute additional emissions if riders must drive an additional 3-5 miles each way to access another park and ride lot.
- The Draft EIS indicates that there will be temporary but long-term lane or roadway closures that may require detour routes during TDLE construction which is scheduled to begin in 2028 and may last until the proposed on-service date of 2035. The detailed construction plan (Potential Mitigation Measure 6.2.5) and the traffic control and construction truck routing plan (Potential Mitigation Measure 6.4.6) should be coordinated with the following County departments: the Planning & Public Works Department Traffic Division; Communications; and, the Sheriff's Office. Notification of any lane or roadway closures and any related detour routes should also be provided to adjacent residences and businesses.
- We seek clarification on the future traffic operations at SR 99 and 70th Ave E (not the new Wapato Way intersection), which is within the Town of Milton and connects directly to nearby County roads. In Attachment A of Appendix J1, Table A-3 and Figure A-2, this intersection is shown as study intersection #20. However, this intersection does not appear to be analyzed in Chapter 4 of Appendix J1, including not being on Figures 4-8 and 4-9. We would like to know the future operations of this intersection in the No Build and Build, particularly since the intersection is very close to one of the proposed guideway supports as shown in Appendix F-07a, page 59 of 60.

- Since Pierce Transit Route 13 and 102 are no longer in service, these two routes should be removed from the list of bus routes serving Tacoma in Table 4-7 and Table 4-9 in the Draft EIS Transportation Technical Report (page J1-18). Sound Transit should coordinate with Pierce Transit to confirm their existing bus routes and schedules.

- The Draft EIS Transportation Technical Report (page J1-105) indicates that Sound Transit Express Route ST 595 from unincorporated Purdy to Tacoma would be discontinued; however, Table 5-5 on this same page identifies ST 595 as a proposed new route via SR-16. This discrepancy should be clarified in the Final EIS.

- It is noted in the Draft EIS Transportation Technical Report (page J1-202) that Sound Transit has previously committed to provide $40.6 million to local jurisdictions and other agencies to fund pedestrian and bicycle improvements to the four TDLE stations to safety accommodate the projected increase in pedestrian and bicycle travel with the TDLE. This funding contribution to lessen the cumulative impacts associated with the TDLE project should be identified as potential mitigation measure in the Final EIS. In addition, information should be provided on how the amount for this mitigation funding was determined.

- The Draft EIS does not include any specific details about accommodations for pedestrians, bicyclists, and the disabled at or inside the four stations. This information should be included in the Final EIS.

- While the Draft EIS Transportation Technical Report indicates that two parking facilities of approximately 500 stalls each will be provided at the TDLE stations in South Federal Way and Fife, it is noted that no additional parking spaces will be provided at the Tacoma Dome Station despite this station having the highest forecasted ridership (10,800 boardings by year 2042) and already experiencing a 99% parking utilization rate of its existing 2,337 stalls (based on 2019 conditions).

Natural Systems

Pierce County has concerns about larger impacts to watersheds and critical areas in these areas. Sound Transit should consider impacts to natural systems that extend beyond the project site including:

- Please review wellhead protection areas and aquifer recharge areas in the jurisdictions affected.
- The Puyallup River crossing is near Pierce County's Clear Creek restoration project managed by the County's Storm Water Management Division. The County supports the long span bridge alternative, as it would have fewer impacts to sediment and flows.
- This project will also impact tribal planning partners: please ensure Sound Transit is coordinating with all federally recognized tribes with cultural resource concerns, ceded lands, and treaty rights in this area.
- All alternatives are located in the 'Floodplain Seclusion Area' of incorporated jurisdictions of Pierce County. Said areas contain dated mapping of flood hazards (i.e., 1970s). The Department proposes Sound Transit use the "best available data" via modelling to determine if the alignment is in the floodplain/floodway. If located within these areas, consult with FEMA for the map revision process. The Pierce County PPW Stormwater Management Division can provide metadata on the Floodplain Seclusion Area if requested.
- Consult with Pierce County staff if any work or temporary construction work proposed with unincorporated Pierce County, and the duration of approved floodplain studies.

Equity/ Engagement

Pierce County supports equitable engagement efforts that have been done to date and would like to be sure that all impacted parties have had a chance to comment. The following suggestions could improve the reach of your engagement efforts:

- The Engagement summary mentions outreach to the Puyallup Tribe of Indians, Muckleshoot Indian Tribe, Nisqually Indian Tribe, and Yakama Nation in 2018. The Squaxin Island Tribe may also have project impact concerns in this area as part of their ceded area.
- Pierce County recommends initial outreach to Squaxin Island, and an additional invitation to participate to the Muckleshoot Indian Tribe, Nisqually Indian Tribe, and Yakama Nation now that draft analysis has been completed.
- Pierce County's equity index indicates that the southern portion of the South Federal Way segment already suffers from poor environmental health, due to a lack of tree canopy cover and high concentrations of Particulate Matter (PM) 2.5 and diesel emissions. Please consider how construction and operations could exacerbate these inequities.

Cultural Resources

Pierce County has reviewed Sound Transit's Section 106 determination and agrees with the findings. We encourage Sound Transit to continue collaborating with local Tribes, in particular the Puyallup Tribe of Indians, who all are likely to have additional input on tribal cultural resources within the impacted area.

Pierce County requests to be an interested party in the development of any Memoranda of Agreement or Understanding for adverse effects to Historic Properties.

Agency Coordination

We commend the engagement efforts of Sound Transit staff to schedule an initial meeting with our department on February 14, 2025 to identify permits and other land use approvals that will be needed from the County. Any permits or land use approvals that are identified from these coordination meeting should be identified in the Final EIS.

We also appreciate the outreach efforts of Sound Transit staff to provide informational presentations about the TDLE project and the Draft EIS to the Pierce County Transportation Advisory Commission (TAC) on December 12, 2025 and on January 23, 2025. These outreach efforts should be recognized in the Final EIS.

If there are any questions or other concerns, please contact Alon Bassok, Long Range Planning Manager, at (253) 798-3767 or Mike Galizio, Transportation Planning Supervisor at 253-798-2373.

Sincerely,

Lauren Flemister
Assistant Director

cc: Andrew Strobel, Executive Office
Bryan Yambe, Council Member, District 5
Hugh Taylor, Council Office
Letticia Neal, Planning & Public Works
Mike Galizio, Planning & Public Works
Alon Bassok, Planning & Public Works

PierceTransit

February 7, 2025

Erin Green
Environmental Manager, South Corridor
Sound Transit
401 S. Jackson Street
Seattle, WA 98401-2826

Re: Sound Transit Tacoma Dome Link Draft Environmental Impact Statement

Dear Ms. Green:

Thank you for opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Tacoma Dome Link Extension (TDLE) Project. As the local transit operator for Pierce County, Pierce Transit will operate both local transit service and contracted Regional Express service from these proposed facilities. We value the partnership with Sound Transit and look forward to the ongoing collaboration as these transit facilities develop.

Pierce Transit has focused our review on the Transportation Technical Report (Appendix J1) and Conceptual design Drawings (Appendix F). We share initial general comments below:

- Transit Stations: Preference is to avoid use of transit islands for passenger boarding, this will help eliminate safety conflict with pedestrians walking through a bus way.
- Eliminate conflicts between buses and stationary objects such as raised beds (flower beds), light poles and overhead light fixtures. The recent Federal Way Station bus test prior to opening of the facility identified conflicts with flower beds and bus tail swing as well as overhead light fixtures and double decker bus height.
- All Sound Transit stations should include inductive charging for future Sound Transit double decker electric buses which we understand are desired for future service. Pierce Transit does not currently operate electric buses for Sound Transit, but if Sound Transit wishes to transition to this style of vehicle, charging will need to be accommodated at station locations. This will provide for optimal scheduling which will allow vehicles to stay in service throughout the day.
- Confirm all stations have an operator comfort station.
- As design progresses, all bus pathways and circulation within a station/facility must be tested with AutoTurn software as a preliminary test. Coach tests will need to be performed prior to proceeding past 60% design. This is standard with Pierce Transit projects; we routinely perform a coach test for all capital facilities and document conflicts not identified with AutoTurn software. Pierce Transit is available to support your tests as you progress through design.
- Pierce Transit services described on Table 4-8 and Table 4-9, have changed since 2020. We can provide updated service information upon request.

Station specific comments from a perspective of transit operations:

Federal Way:

SF I-5 Station – This station does not appear operationally feasible due to ongoing challenges with access from the adjacent future WSDOT roundabouts and S 356th Street. Additionally, the plan sheets do not show the roundabout that will provide access to the bus loop off South 356th Street. We are concerned this alternative will generate delays to transit service due to access issues, Pierce Transit does not recommend this alternative from an operational perspective.

Fife:

Fife 54th Avenue Station Options (Alternatives Considered, Figure 2-24, Fig 2-26, Fig 2-27, Fig 2-28) – All station designs require emergency egress for coaches. As design progresses, add bollards that can be removed for emergency egress. No transit station facility should have only one ingress and egress; all facilities should have an emergency egress if the station access is blocked.

Portland Avenue:

Pierce Transit prefers the design that does not span Portland Avenue. In this design, the bus bays are consolidated on Bay Street and away from Portland Avenue, which should help with congestion. It will also align well with Tacoma's Puyallup Avenue Project. We also suggest that another paratransit area be located along Bay Street, if possible.

Tacoma Dome Station:

Recommendations:

- Ranked 1st: Close to Sounder (2-Way Only, ASP 104-123) with adjustments:
  - Additional layover zones needed on G Street (near where existing bus zones are).
  - Design changes are needed. Remove bulb outs at the corners of D & G Street, as well bulb outs at the pick-up/drop-off zones, to make maneuvering a bus easier. Additionally mid-block crossing is needed for safety.
- Ranked 2nd: 25th Street West Alternative (ASP102-91) with adjustments:
  - There are maneuverability issues with the proposed transit center design. A pedestrian walkway and expanded sidewalks will add to the issue. The bays alongside the garage must be relocated to Puyallup Avenue to ensure there's enough space for buses to maneuver.
    - In this alternative, we support the bus layover zone design as it will be easy to maneuver in. We suggest the addition of a comfort station at layover area, as well as another paratransit drop-off area on G Street.

Do not recommend:

- Ranked 3rd: 25th Street East Alternative (ASP102-106)
  - This has the same maneuverability issues as the 25th Street West Alternative when it comes to the proposed transit center design. The Option A layover zone is preferred but would need to be reconfigured to ensure buses can maneuver inside of the zone. As it is currently configured, it is too tight.
  - There is currently a transformer at the west side of this location. Would this be moved?

- Ranked 4th: Close to Sounder (1-Way Only, ASP103-122) Alternative
    - There are maneuverability concerns associated with the sawtooth design of the E 25th Street and the proposed bus zones. In addition, having the additional bus zones across the street from the Station will decrease rider convenience.
- Ranked 4th: Close to Sounder (ASP102-121)
    - We do not support the active bus zone area as designed, which is further away from the train, and presents maneuverability and pedestrian safety concerns.
- Ranked 5th: 26th Street
    - Pierce Transit does not recommend this as a viable option. We believe that this is the least desirable option as it separates the station from transit connections at Tacoma Dome Station.

Tacoma Dome Station Boardings

Boardings from Tacoma Dome Station are estimated in Appendix J1 Transportation Technical Report, Attachment D – Parking Inventory and Impact Evaluation, and in Chapter 3 Transportation Environment and Consequences. TDLE Station Boardings are summarized in J1 on pgs. 8-14. Tacoma Dome Station Boardings are estimated at 10,800 total average weekday boardings. PM Peak Period Mode of Access at TDLE Station for Passengers Exiting the Train is estimated for the Transit Transfer Mode at 3,000 (49% transfer rate). Based on ridership experience at the Tacoma Dome Station, the PM Peak boardings is not a strong reflection of the highest boarding activity for this location. The PM Peak Passengers Exiting the Train better represents the highest peak period for this facility. Pre-pandemic we experienced the Tacoma Dome Station reaching capacity by 7:00 am due to the strong morning commute.

The DEIS assumes growth for Pierce Transit local transit service as identified in the *Regional Transportation Plan*. If Pierce Transit is realizing the service vision identified in our *Destination 2040 Long Range Plan* and the *Regional Transportation Plan*, our service levels would be close to meeting this demand. Assuming most of the transit transfers were to local transit, the local Pierce Transit buses serving Tacoma Dome Station would be at maximum loads.

It is Pierce Transit's desire to operate the levels of service identified in our Board adopted *Destination 2040 Long Range Plan*. However, if the residents of Pierce County were not supportive of funding the additional services identified in the long-range plan, the local transit service needed to support transit riders travelling to and from the Tacoma Dome Station would not be financially feasible to operate. Financial support from Sound Transit would be required to provide the level of service capacity required to transport the volume of transit riders needing to reach Tacoma Dome Station to transfer to the future Tacoma Dome Link Extension. This potential mitigation should be identified in Sound Transit's plans.

Additionally, Sound Transit should document the need for future parking demand management at the Tacoma Dome Station in the form of regional parking management at the facility.

Construction Impacts – T Line Closures

The DEIS and Alternatives Guide indicates that construction will occur from approximately 2029-2035. The Alternatives Guide (pg. 33) documents that two alternatives – Tacoma 25th Street-West and Tacoma 25th Street-East – will require potential T Line closures. The T Line experienced over 919,600 boardings in 2024. T Line is a critical connection in the downtown Tacoma area and cannot sustain the impact of a total shut down of T Line service without a replacement to connect local Pierce County users. If T Line is temporarily closed during construction, Sound Transit should mitigate that impact and fund a local connector service throughout the construction period.

Pierce Transit believes Tacoma Dome Station Parking & Construction Impact Mitigation should include:

1 – Funding for service for riders to reach Tacoma Dome Station Tacoma Link Extension
2 – Funding for parking management services (pay-for-parking implementation) at Tacoma Dome Station
3 – Funding for a T Link connector service during construction when T Link is temporarily closed

Pierce Transit Staff Responsibilities:

Our Planning team will continue to be your primary contacts through the DEIS and final design processes. Tina Lee will continue to be the lead participant and main point of contract for Pierce Transit. Tina will ensure coordination throughout the agency. Andrew Arnes is responsible for current planning and scheduling; he will ensure support with our scheduling team.

Tina Lee
Planning Manager
tlee@piercetransit.org
253-589-6887

Andrew Arnes
Service Planning Assistant Manager
aarnes@piercetransit.org
253-983-3389

Sincerely,

Ryan Wheaton
Chief Planning Officer

cc: Tina Lee
Andrew Arnes

THE NORTHWEST SEAPORT ALLIANCE
SEATTLE + TACOMA

Port of Tacoma

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February 10, 2025

Ms. Elma Borbe
Sound Transit
401 S. Jackson St.
Seattle, WA 98104

RE: TDLE Draft Environmental Impact Statement Comments

Dear Ms. Borbe,

On behalf of the Port of Tacoma (Port) and The Northwest Seaport Alliance (NWSA), thank you for the opportunity to provide comment on the Sound Transit Tacoma Dome Link Extension (TDLE) draft EIS. The Port of Tacoma and Northwest Seaport Alliance have a significant interest in the regional transportation system via our maritime freight operations, industrial land tenants, and our general responsibilities as public port authorities under Washington State Law. Our maritime cargo operations support the regional economy by providing jobs, supporting international trade activity across the region, and maintaining a stable supply chain for businesses and residents alike. As the region's population, and overall consumption of goods, continues to grow, so does demand for our services.

We support the mission to enhance transportation in the region and reduce otherwise increasing traffic congestion and believe TDLE will be great asset for Pierce County when it is open. We provide these comments to identify areas where the impacts of this project may result in impacts on our maritime freight operations and supporting industrial land uses in the project vicinity.

Fife Station. We support the Preferred Fife Station east of 54th Ave. This station is consistent with Fife's City Center plan which includes transportation considerations to support maritime cargo and industrial interests in the area. The other alternatives will lead to traffic changes that will exacerbate congestion in the vicinity of 54th Ave and Pacific Hwy, a vital intersection for port traffic, and as well as 12th St and 54th Ave.

The alternate Fife stations may conflict with the planned reconstruction of the 54th Ave interchange. This interchange project is recommended for state funding by FMSIB and is important to making sure the transportation system can support future maritime cargo needs from Port of Tacoma terminals. If the preferred alternative is not chosen for construction, Sound Transit must ensure that their station is forward compatible with this planned project to mitigate potential impacts to the future growth of maritime cargo at the Port of Tacoma.

Additionally, while it is not a part of the Preferred Fife Station, we are opposed to the concept of bus bays on 54th Ave. 54th Ave is of significance to the freight system as well as the military, being a designated STRAHNET corridor. Inserting transit on to this road when more practical drop-off locations at the station exist, creates significant conflict with the need for maritime freight to have predictable travel times on essential routes.

Pacific Hwy Alignment. We are strongly opposed to the alignment that would result in the guideway being in the middle of Pacific Hwy through Fife. While this is an early concept, advancing this alternative alignment would need to extensively analyze and mitigate impacts to freight along Pacific Hwy, including business access to existing and potential industrial sites. This would, at a minimum, include extensive parcel-level analysis along Pacific Hwy, consideration of the loss of truck queue space in the median or turn lanes, and the construction of new turnaround routes for heavy trucks up to and including WB-67 trucks.

Portland Ave Station. While we are neutral on the specific station location, the Port of Tacoma and NWSA are opposed to bus bays on Portland Ave. The bus bays in the travel lanes stand to interrupt the flow of freight leading to travel delays and increased points of conflict in the system. The Port of Tacoma and City of Tacoma have coordinated extensively on land use in the area so that all may benefit from this new station. The addition of bus bays on Portland Ave would be an unforced error for shared interests in the area.

As the design for this area is developed, Sound Transit needs to recognize that this road will remain a key freight corridor due to its connectivity to the Port of Tacoma and I-5. This area is located within the Port of Tacoma MIC, so freight trucks need to have a level of priority in the final design, including minimum 11-foot travel lanes and traffic control systems that reduce the number of starts and stops required for truck traveling between Puyallup Ave and I-5.

Construction Impacts. Port of Tacoma and NWSA operations rely on multiple routes that are going to be impacted to varying degrees and durations during construction. We expect

that the future construction team will be required to consult with the Port of Tacoma and Northwest Seaport Alliance closely so that we can work together to minimize impacts to our freight interests. The coordination will be mutually beneficial as our staff can also support the project's need to communicate to truckers about upcoming construction activities.

Please let us know if you would like to discuss any of the comments in this letter as our staff will be happy to provide technical support as needed.

Thank you for the opportunity to comment and the consideration of our feedback. Should you have any questions regarding this letter, please contact Matthew Mauer at (253) 888-4734 or mmauer@portoftacoma.com.

Sincerely,

Eric Johnson, Executive Director
Port of Tacoma

John Wolfe, CEO
Northwest Seaport Alliance

Puget Sound Regional Council

1201 Third Avenue, Suite 500, Seattle, WA 98101-3055 | psrc.org | 206-464-7090

February 7, 2025

Elma Borbe
Senior Environmental Planner
401 South Jackson Street
Seattle, WA 98104-2826

Re: PSRC Comments on the Tacoma Dome Link Extension Draft Environmental Impact Statement

Dear Ms. Borbe:

The Puget Sound Regional Council (PSRC) appreciates the opportunity to comment on the Tacoma Dome Link Extension Draft Environmental Impact Statement (DEIS). The implementation of high-capacity transit to support growing communities and provide options for regional mobility is fundamental to the success of VISION 2050, the region's integrated long-range strategy for growth management, transportation and economic development. The Regional Transportation Plan includes extension of high-capacity transit in this corridor as a vital component of enhancing mobility and providing travel choice in the region. Accordingly, PSRC has an ongoing interest in high-capacity transit system planning for the Seattle to Tacoma corridor and has been designated as a Participating Agency in this project.

We commend Sound Transit for their work to date on the Tacoma Dome Link Extension Project and specifically the DEIS effort. Our review found consistency with PSRC's long-range planning and agreement with the methodologies used to evaluate the impacts and benefits of different stations and alignments. We appreciate that the comments PSRC previously provided on the draft Environmental Methodology Report were considered and incorporated into the evaluations in the DEIS.

We provide the following comments for consideration:
TOD potential. The promotion of transit-oriented development (TOD), characterized by compact, walkable, mixed-use development, is key to implementing the objectives of VISION 2050 and the Regional Transportation Plan. Incorporating TOD in the environmental review of potential high-capacity transit station areas and alignments is an important step toward Sound Transit choosing its investments with current and future land use in mind, and in doing so, building a transit system that supports community building. The Station Area Planning Report, which accompanied release of the DEIS, provides important context on station access, existing zoning, and future TOD potential. As planning for the region's critical high- capacity transit system progresses, we encourage Sound Transit to continue to include TOD as a central component of its analysis, think beyond the existing land use patterns and local planning efforts, and fully consider the best ways and locations to achieve equitable TOD, a cornerstone goal of the VISION 2050 Regional Growth Strategy.

Travel time and transit access. PSRC recognizes the importance of comparing alignment and station alternatives in terms of the resulting light rail travel time. However, there is another dimension of travel time, door-to-door travel time for transit passengers, that would enrich the discussion on transit access in the DEIS. All the stations under consideration are elevated, which provides for grade separation, but could also add travel time for accessing or transferring at the stations. We encourage Sound Transit to ensure these stations allow comprehensive access and easy connections by all individuals, particularly people with special transportation needs, such as older adults and people with disabilities. Doing so will help both reduce travel times for passengers and improve fire and safety emergency preparedness.

Interim Parking. The DEIS states that planned park and ride spaces at South Federal Way and Fife stations would be deferred for up to 3 years from the start of light rail service. If parking is not provided, we encourage Sound Transit to ensure that other transit accessibility options are available and/or studied and to encourage consideration of full access to transit modes to support ridership. The DEIS mitigation does not mention positive options, or more restrictive measures such as parking controls in the station areas.

Clarification of Design Option alternatives. The Federal Way Segment includes the Preferred FW Enchanted Parkway Alternative and FW Design Option. The distinction of the FW Design option compared to other options in the DEIS is unclear to reviewers and should be clarified to avoid confusion.

Greenhouse Gas (GHG) Calculations. No technical supporting information was found in Appendix H; having the full background available on the calculations would be helpful and transparent.

Community Engagement and Stakeholder Involvement. We commend the project team for their efforts to engage with a diverse range of community members. We recommend considering compensation for participants' time and expertise, as this could further encourage participation and ensure that community members' contributions are appropriately recognized and valued. We also appreciate the clarity with which scoping comments were shared with the public. It was helpful to easily access summaries that illustrate the feedback you have received on the link extension. We encourage continued transparency in the ongoing public review and comment process, particularly as the project moves through the Final EIS stages, to ensure that the voices of all stakeholders are heard and addressed.

Tribal Consultation and Cultural Resources. The project team's efforts to engage with local Tribes are commendable, particularly regarding the identification of high-risk parcels where cultural and human remains may be present. Consultation will be required to address these concerns adequately. As the project advances, we recommend prioritizing early and ongoing coordination with Tribal representatives to ensure that cultural sensitivities are addressed and that potential impacts to culturally significant areas, such as the Puyallup River crossing, are minimized. The Tribe's preference for a "clear span" bridge to avoid additional river columns should be taken into consideration, as it aligns with preserving traditional cultural properties.

Public Health, Equity, and Accessibility. We strongly support the project's focus on improving public health, equity, and human well-being in communities that have historically

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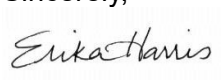
faced disproportionate social, environmental, health, and economic challenges. We recommend that these goals remain central throughout the planning, design, and implementation phases of the project. Furthermore, the need to enhance connections to other transportation modes and increase accessibility for underserved populations and individuals with disabilities must be emphasized as part of the project's objectives. Addressing these needs will contribute to a more inclusive and equitable transportation system.

Displacement and Relocation. We also commend the project team for utilizing PSRC's displacement risk tool to assess and understand the potential impacts of displacement on vulnerable populations. We acknowledge that the identification of displacement risks is a critical step in planning for mitigation strategies. As the project moves forward, we encourage Sound Transit to continue developing strategies that will help minimize the negative effects of displacement, particularly for low- and moderate-income households, households of color, and businesses owned by members of marginalized communities. Successful relocation options should be prioritized to support community stability, though we recognize that such efforts may present challenges.

The Tacoma Dome Link Extension Project is an important long-range investment for the region. We commend Sound Transit again for the DEIS effort, and we appreciate the opportunity to comment and participate. If you have any questions regarding our comments, please contact Philip Harris, Principal Planner, at (206) 464-6843 or pharris@psrc.org.

Sincerely,



Erika Harris, AICP
SEPA Responsible Official
Puget Sound Regional Council

cc: Kelly McGourty, Director of Transportation Planning
Craig Helman, Director of Data
Charles Patton, Program Manager, Equity Policy & Initiatives
Gil Cerise, Program Manager
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Philip Harris, Principal Planner

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10 February 2025

Elma Borbe
Sound Transit
401 South Jackson Street
Seattle, WA 98104
(submitted via electronic mail)

Dear Ms. Borbe:

The City of Tacoma appreciates the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Tacoma Dome Link Extension (TDLE). The TDLE represents a landmark investment for Tacoma and the broader Puget Sound region, marking a long-awaited connection between the LINK "Central Spine" and Tacoma, the second-largest city in the region.

Recognizing the significance of this initiative, the City of Tacoma offers the following comments to aid Sound Transit's Environmental Impact Statement (EIS) process. These comments focus on key technical concerns and core values essential to maximizing the TDLE's potential and addressing its impacts. They are not presented in any order of importance.

Business and Land Use Impacts
The DEIS narrowly evaluates direct business impacts (i.e., the number of businesses displaced), but it under emphasizes the effect of construction impacts to existing businesses. This gap in the DEIS needs to be addressed. The recent experience of the Hilltop Link Expansion demonstrates the significant impact that construction can have on nearby businesses. This project is much larger in scale than that one and will have greater and longer construction impacts. It is more likely than not that many businesses will not be able to sustain the long construction period with the noise, dust, and limited access available for their customers. These construction impacts to businesses need to be acknowledged, evaluated as part of the options analysis, and appropriate mitigation needs to be provided.

As the DEIS indicates, a high proportion of business owners in the Dome District (particularly in Freighthouse Square) are minority-owned, and successful relocation opportunities may be challenging. Freighthouse Square has long served as a valuable small business incubator. The vulnerable population of business owners, employees, and patrons of Freighthouse Square will require very intensive support, resources, and culturally appropriate communications, starting well in advance of construction. This serious impact must be acknowledged and mitigated under any of the options for the Tacoma Dome Station, but particularly the ‘East 25th Street West’ and ‘Close to Sounder’ options.

The DEIS does not mention or account for the significant impact that the complete closure of the T-line for up to 3 years would have on local businesses and users. This closure would have dramatic effects on business not just in the Tacoma Dome area, but also in the Brewery District, UWT/Museum District, Downtown Core, and St. Helens, Stadium and Hilltop Neighborhoods that just underwent years of disruption from the T-line extension. Impacts to commuters would also be significant. There are 1,000 high school students downtown that use the T-line to get from class to class and another 5,000 students at the University of Washington-Tacoma who would be impacted by this closure, not to mention downtown workers. The Final EIS must fully analyze and address these significant impacts and incorporate appropriate mitigation measures to address them.

The DEIS also fails to fully recognize and analyze the substantial impacts on properties adjacent to the proposed project, particularly the track guideways between the stations. If Sound Transit chooses one of the East 25th Street stations for the Dome District, the project will effectively create a continuous, nearly one-mile long viaduct down the East 25th Street corridor spanning nearly the entire width of the right-of-way. This structure will have substantial impacts on the existing operations of adjacent properties and introduce noise, light blockage, and visual impacts that will substantially impact the future redevelopment of these properties. This is particularly concerning in areas where transit-oriented development is envisioned. These impacts needs to be more fully examined in the Final EIS

The DEIS mentions that the Tacoma Dome 'Close to Sounder' Station Alternative conceptual design incorporates a potential joint development opportunity to provide non-transit uses (e.g., retail and/or other uses that support both transit ridership and the vibrancy of the surrounding neighborhood) underneath the potential elevated station and guideway. This supports Tacoma's goal for the Dome District to be a vibrant Transit-Oriented Development (TOD) neighborhood and would also help mitigate for loss of business, jobs and community activities by activating areas under guideway/station/tail tracks.

The DEIS land use impact analysis erroneously states "[a]ll of the alternatives in the Tacoma Segment would use land currently in commercial use and in an area currently designated for industrial use." The Tacoma Dome stations are located in the Downtown Regional Growth Center and the DMU zone, a mixed-use zone, which is specifically intended to support transit-oriented development, NOT industrial use. Furthermore, impacts to current/future residents in the study areas are not sufficiently addressed in the DEIS. There are currently 5 projects (completed and/or underway) along E 25th and 26th Streets totaling 875 new residential units. Mitigation regarding access to those sites, noise and other needs of the residents need to be considered.

Taken together, the project's impacts to commercial land use, along with the underlying zoning (and Comp Plan designation) that support transit-oriented commercial, service, residential, restaurant, and retail uses argue strenuously for a station area, and specifically a station design itself that mitigate the loss of commercial uses, and incorporate additional transit-oriented commercial activity in this area. In particular if Sound Transit chooses the 'Close to Sounder' station option for the Tacoma Dome District, this should be accomplished explicitly by providing retail, restaurant, and related commercial space through intentional design and station joint development (in addition to surplus land redevelopment). The analysis concludes with joint development as the most important mitigation strategy relative to the land use impacts of the alternatives, and must be included in the Final EIS and project agreements.

For the Tacoma Dome Station, the DEIS documents a visual environment that requires a very intentional, architecturally unique and appropriately-scaled terminal that responds to the scale and grain of this major multimodal hub. As the DEIS notes, the special circumstances of the Tacoma Dome Station would not be served well by "one size fits all" design treatments. Creation of a distinctive, landmark "terminal" station structure at a scale that is appropriate to the large transit facilities and other area destinations (i.e. Tacoma Dome, LeMay Museum) will be critical to both express the regional importance of the Tacoma Dome terminus and provide a visual focus to the area. If Sound Transit chooses the 'Close to Sounder' Tacoma Dome Station option, the proposed mixed-use station could establish a unique opportunity for a distinctive, landmark-scale architectural expression, providing a focus appropriate to the regional significance of this multi-modal complex and the "end of the line" terminal for transit users and other visitors to the area alike.

Multimodal Access & Transportation

The DEIS is relying significantly on partner projects, particularly local transit improvements, to fill in the access to the stations and connect it to other parts of the City. The accessibility of the stations to the greater transit system is a responsibility of both Sound Transit and their partners. This point needs to be addressed more fully in the Final EIS and more robust plans need to be in place to ensure these critical local transit improvements can be made in coordination with this project.

The proposed TDLE is different from a lot of other transportation projects in that it is relying on an alignment and associated stations elevated above the existing transportation system of streets, sidewalks, and trails. The elevated TDLE alignment presents unique challenges related to changes in traffic patterns, pedestrian mobility, and street-level transportation. Even with the benefit of limiting outright traffic mode conflicts, there are still associated changes in traffic patterns (of all modes) and demands associated with the proposed stations that warrant mitigation and/or additional provisions to support. Further analysis is needed to ensure that the project incorporates adequate multimodal access provisions and mitigation strategies to maintain efficient transportation operations in the impacted areas.

In the Portland Avenue station area, Sound Transit and the City, along with critical partners like WSDOT, the Puyallup Tribe and the Port of Tacoma, should explore opportunities to coordinate on evaluating potential redesign of the transportation network in the station area to better accommodate the complicated multimodal transportation patterns in this area. For the Tacoma Dome Station, if Sound Transit chooses the 'East 25th Street West', 'East 25th Street East', or 'East 26th Street' station options (each of which is aligned over the existing roadway), Sound Transit will need to conduct much more detailed analysis and design work for those road corridors, in partnership with the City, to ensure that the design of the elevated stations and tracks does not unduly restrict the City's ability to operate and maintain those local transportation corridors.

The study's representation of anticipated changes in traffic demands and patterns, as influenced by the proposed TDLE stations (Portland Ave and Tacoma Dome) and overall Link ridership forecasts suggests only limited/localized intersections that would not meet allowable operational levels once the extension is constructed. The anticipated mitigation of those locations is not expected to be extraordinary, but was also left ambiguous as part of the study's narrative (e.g., East 26th Street at Portland Avenue). Forecasted conditions, and thus projected transportation impacts (or lack thereof), are dependent on traffic mode/use assumptions along with the expected (or to-be-provided) means for those various modes to be reasonably utilized for

access to and from the TDLE stations. For example, the study is not as detailed as needed in showing how other modes such as walking and biking will be specifically addressed to ensure an adequate mode split to ensure projected vehicle demands and overall transportation impacts remain manageable.

The City understands that the DEIS cannot be all-encompassing in the details it discusses, but the City needs this transportation dynamic topic further analyzed in the Final EIS to better address mobility and accessibility needs in terms of site improvements, site-adjacent improvements, off-site improvements, and overall route improvements—even if those have separate (pending) processes and means to examine and ultimately implement. The City supports the focus on multimodal access to the TDLE stations, but we disagree with the DEIS' assertion that "no mitigation is required" for non-motorized travel. In the Portland Avenue Station area, improved access to McKinley Hill and the destinations and neighborhoods south of Interstate 5 are particularly important. In the Dome District, seamless access between the TDLE station and the T-line is of paramount importance (as the DEIS identifies it as a primary access point for TDLE), along with convenient and user-friendly access to all of the other modes at this regional hub, including local and regional buses, Sounder, Amtrak, and Greyhound. More assessment and information is needed on how Sound Transit will mitigate these impacts and support active transportation access to the stations and multimodal integration.

Practical Concerns of the Elevated Design

In order for the elevated train alignment/operation, support pillars are introduced at ground level and depending on the given location along the alignment, they may not provide typical operational buffers to moving traffic (vehicles, bicyclists, pedestrians). In urban environments, these elements are not uncommon to encounter (e.g., utility poles, sign posts, etc.), but only in moderation. Under the current preliminary design, the pillars supporting the TDLE tracks are very large and needed every 100+/- feet on both sides of the given roadway (e.g., East 25th Street). This detracts from reasonable relief from encountering such roadside elements as well as imposing practical limitations on being able to provide typical traffic and parking control devices as well as accommodating existing and future property access points. The overhead presence of the tracks and support system also significantly constrain the underlying street layout and configuration to only certain possibilities despite the full right-of-way typically being at the City's disposal for future development-specific or transportation-system supported future project or change. Regardless of the route selected, we ask that Sound Transit commit to working closely with the City on siting the pillars and implementing strategies to address their impacts on ground-level transportation and use of the right-of-way.

The elevated stations and guideway also present the obvious potential to create areas without any significant active use or oversight. As Sound Transit is well aware, these "leftover" areas often create opportunities for blight and undesirable criminal activities. The stations and guideway must be designed to limit these areas, maximize the active use of any spaces under the facilities, and employ Crime Prevention Through Environmental Design (CPTED) techniques or other mitigations to reduce this potential. These issues must be more fully addressed in the Final EIS and in the final project design.

Utilities

The City's utilities (including TPU-Power, TPU-Water, Environmental Services-Stormwater, Environmental Services-Wastewater, and TPU-Communications) have raised concerns regarding the potential impacts to utility infrastructure for this project. Of particular concern is necessary relocation along E. 25th Street for the proposed 25th Street East and West station options. Challenges include the lack of available space for relocation due to zero lot line

development, existing right-of-way congestion, low gradients, shallow coverage of existing infrastructure, and poor soil conditions. Utility reconfiguration in this area will require significant planning and design work, necessitating very close coordination between Sound Transit and utility providers, and complicated construction within congested corridors. Any necessary utility work will be at the expense of Sound Transit. Additionally, should Sound Transit choose to keep some of the existing utilities in place, there is a concern that maintenance and repair access will be significantly constrained or unable to be performed using standard industry means and methods.

Freighthouse Square and Historical Considerations

The City believes that the adverse impacts resulting from the potential removal of the 1909 Milwaukee Road Freight House, popularly known since its 1987 repurposing as a retail and food destination as Freighthouse Square, is inadequately addressed in the DEIS. We share community concerns that the impacts to the character of the Dome District would be significant under the 'Close To Sounder' alternative, as well as those resulting from the construction of a large viaduct in close proximity as identified in the in the '25th Street East' and '25th Street West' alternatives.

The City is aware that Freighthouse Square has been determined Not Eligible for the National Register of Historic Places due to lack of historical integrity resulting from alterations, but this sole measure fails to account for its community significance and its importance as a visual place marker in the Dome District. As an iconic community landmark, it serves to clearly identify the Dome District and provide a reference point to residents and visitors both geographically and by its association with the history of rail operations that is fundamental to Tacoma's identity. It is also one of the few remaining recognizable structures associated with this historical theme in the district. The remnants of the Milwaukee & St Paul Railway have slowly but steadily been removed from this context over time, including the loss of tracks and trestle that historically linked to Freighthouse. The Final EIS should recognize this local significance and evaluate how the various options can be designed to minimize or mitigate those impacts. Additionally, due to its local significance, it is likely that any demolition of this structure will be reviewed at the development permit stage under the City's historic demolition review code.

The City recommends additional consideration of the treatment of this valuable community asset, and that the adverse impacts from its demolition should be reviewed beyond the economic or business impacts. The current DEIS Cultural Resources section makes very little mention of Freighthouse Square, but the impacts resulting from its removal should receive substantial review, as it would be one of the more significant and visible outcomes of the Tacoma section of this project from a public perspective. Lastly, the City would recommend, if Freighthouse Square is to be removed, what mitigation measures beyond impacts to tenants would be appropriate and commensurate with its significance to the community. Particular focus should be on the future station design, how it would respond to the historical context of the area and Freighthouse Square itself, and how what is built can be iconic in design and architecturally relevant to the residents of Tacoma.

Trees

This project has the potential to significantly impact the City's tree canopy in the station and along the track corridor. The project will need to have the existing trees within the area of impact surveyed, to include tree location, size, species, and health rating/condition. This information will need to be overlaid with the layout alternatives, to understand which trees will need to be removed, and which ones will be saved through construction. Tree removals will need to be mitigated. The project will also be responsible for providing trees and landscaping

as required for the new transit stations and street trees along those portions of street corridors that are significantly altered. If Sound Transit chooses to run the tracks in elevated structures down street corridors, this may make infeasible the provision of street trees along those corridors and necessitate alternative planting mitigation plans to be considered.

Rights-of-Way and Easements
The right-of-way (ROW) needs for the project will be extensive. Depending on final route location/placement, additional ROW and/or easements will most likely be required from property owners along the corridor. Acquisition of any new or expanded property rights or relocation of any utilities (including but not limited to street/signal infrastructure) or relocation of personal property required for the TDLE project will need to be at the cost of the TDLE project. Furthermore, if additional ROW or easements are required, the width of such may vary depending on the type of utility infrastructure and vertical and horizontal separation requirements, as determined by the utility, along with any restrictions or conditions. If condemnation should be required to obtain any new or expanded property rights as a result of the TDLE project, Sound Transit will be the condemning authority. If any acquisition or relocation is required for the project, Sound Transit will be the agency conducting such acquisition/relocation activities which shall be in compliance with state and federal statutes including the Uniform Act.

Thank you for the opportunity to comment on the Draft EIS. The City of Tacoma looks forward to our continued partnership on this very exciting project. We believe these types of high-capacity connections are critical to providing the full menu of transportation alternatives necessary to meet the needs of the region and our growing population in a more sustainable and resilient way. Tacoma remains committed to working with Sound Transit through the project design and delivery process to refine the TDLE project in a way that balances regional transportation goals with local community needs. We look forward to continued dialogue and collaboration to ensure the successful delivery of the TDLE project.

Sincerely,

Hyun Kim
Acting City Manager

c: Mayor Victoria Woodards and Members of the Tacoma City Council
Hyun Kim, Deputy City Manager
Allyson Griffith, Interim Deputy City Manager
Jackie Flowers, Director, Tacoma Public Utilities
Peter Huffman, Director, Tacoma Planning & Development Services
Ramiro Chavez, Director, Tacoma Public Works
Geoff Smyth, Interim Director, Tacoma Environmental Services
Carol Wolfe, Interim Director, Tacoma Community & Economic Development
Brian Boudet, Planning Division Manager, Planning & Development Services

Tacoma Dome Link Extension

Comment Form for Tribal and Cooperating Agency Review of Administrative Draft EIS - Main Volume

Reviewing Tribe/Agency: City of Tacoma ***Comments Due: February 10, 2025***

#	ADEIS Chapter/Section	PDF Page No.	Figure/ Table No.	Comment	Reviewer	Action Taken
1	2 Alternatives Considered	8		Other parts of the document say 18 hours.	B. Churchill	
2	2 Alternatives Considered	22	2-22	Tacoma Power 115kV Transmission Line	J. Rempe	
3	2 Alternatives Considered	22	2-22	Tacoma Power - 2 x 230kV Transmission Lines Will Require modification to allow the TDLE to pass under.	J. Rempe	
4	2 Alternatives Considered	22	2-22	Tacoma Power 115kV Transmission Line	J. Rempe	
5	2 Alternatives Considered	23	2-23	Tacoma Power 115kV Transmission Line - will require relocation	J. Rempe	
6	2 Alternatives Considered	23	2-24	Tacoma Power 115kV Transmission Line - will require relocation	J. Rempe	
7	2 Alternatives Considered	24	2-25	Tacoma Power 12.5kV Overhead Distribution Feeder on West side of 54th - will need to converted to underground	J. Rempe	
8	2 Alternatives Considered	24	2-25	Tacoma Power 12.5kV overhead Distribution system	J. Rempe	
9	2 Alternatives Considered	24	2-26	Tacoma Power 12.5kV Overhead Distribution Feeder on West side of 54th - will need to converted to underground	J. Rempe	
10	2 Alternatives Considered	24	2-26	Tacoma Power 12.5kV overhead Distribution system	J. Rempe	
11	2 Alternatives Considered	25	2-27	Tacoma Power 12.5kV Overhead Distribution Feeder on West side of 54th - will need to converted to underground	J. Rempe	
12	2 Alternatives Considered	25	2-27	Tacoma Power 12.5kV overhead Distribution system	J. Rempe	
13	2 Alternatives Considered	25	2-28	Tacoma Power 12.5kV Overhead Distribution Feeder on West side of 54th - will need to converted to underground	J. Rempe	
14	2 Alternatives Considered	25	2-28	Tacoma Power 12.5kV overhead Distribution system	J. Rempe	
15	2 Alternatives Considered	26		Four station alternatives in the Tacoma Dome area and two station alternatives in the Portland Ave area.	B. Churchill	
16	2 Alternatives Considered	27	2-29	Tacoma Power 115kV Transmission Line on 25th & 26th	J. Rempe	
17	2 Alternatives Considered	27	2-29	Tacoma Power Milwaukee Substation	J. Rempe	
18	2 Alternatives Considered	29	2-33	115kV Transmission line is located on the North edge of E 25th to Portland Ave. The portion to E L St may be relocated to E 26th St. The 12.5kV Distribution is Overhead on the North Side of E 25th from E G St to Portland Ave. Assuming a Straddle Bent design these lines would be force to UG &/or relocated. J Rempe TPWR 2025-01-15	J. Rempe	
19	2 Alternatives Considered	30	2-34	115kV Transmission line is located on the North edge of E 25th to Portland Ave. The portion to E L St may be relocated to E 26th St. The 12.5kV Distribution is Overhead on the North Side of E 25th from E G St to Portland Ave. Assuming a Straddle Bent design these lines would be force to UG &/or relocated. The Potential Transit Area @ E G St is located where our 115kv to 12.5kV Milwaukee Substation is located. Estimated cost to relocate $15-20 million. J Rempe TPWR 2025-01-15	J. Rempe	
20	2 Alternatives Considered	31	2-35	The track will pass under Tacoma Power 115kV line @ E L St. J Rempe TPWR 2015-01-15	J. Rempe	
21	2 Alternatives Considered	32	2-36	Tacoma Power has overhead distribution feeder along the South edge of E 26th. The facilities will need to be converted to UG and/or relocated in order to maintain service to existing structures. From East G St to East L St 115kV transmission is on the South Side of E 26th to feed our Milwaukee Substation @ East G St. J Rempe TPWR 2015-01-15	J. Rempe	
22	3 Transportation Environmen	1		Please ensure Transportation Comments made within the supporting tech memo (J1) for this chapter are reviewed/applied to similar/same content in this chapter; also see "07c" and/or "07d"	B. Kidd	
23	3 Transportation Environmen	11	Table 3-6	Discuss: Where did this list of streets come from? It doesn't match up with the WSDOT Freight map.	L. Kaster	
24	3 Transportation Environmen	12		Need to provide RCW information about public roadways being a legal crossing, unless signed to prohibit. They don't need to be marked with a crosswalk.	B. Churchill	
25	3 Transportation Environmen	12		Portions of E 25 St, E 26 St, and Puyallup Ave have sidewalk.	B. Churchill	
26	3 Transportation Environmen	12		Portions of E 26 St, E 27 St, E 28 St, and E Bay St have sidewalk. Will need to find out the reasoning behind WSDOT not installing sidewalk on the portions of roadways (E 27 St and E 28 St) that front I-5, which was recently completed.	B. Churchill	

Tacoma Dome Link Extension

Comment Form for Tribal and Cooperating Agency Review of Administrative Draft EIS - Main Volume

Reviewing Tribe/Agency: City of Tacoma ***Comments Due: February 10, 2025***

#	ADEIS Chapter/Section	PDF Page No.	Figure/ Table No.	Comment	Reviewer	Action Taken
27	3 Transportation Environmen	12		signalized	B. Churchill	
28	3 Transportation Environmen	12		The Puyallup Ave project will be reconstructing the traffic signal systems, which will include marked crosswalks.	B. Churchill	
29	3 Transportation Environmen	12		This is unclear - not all legal crossings have curb ramps & ped signals.	L. Kaster	
30	3 Transportation Environmen	13		Dome	B. Churchill	
31	3 Transportation Environmen	13		portions of East L St (the bike lane starts & stops)	L. Kaster	
32	3 Transportation Environmen	15		four?	B. Churchill	
33	3 Transportation Environmen	15		I'm not clear on how the 72% on street parking utilization + 45% off street = 81% parking utilization?	L. Kaster	
34	3 Transportation Environmen	17		pedestrian and bicycle detours as needed	L. Kaster	
35	3 Transportation Environmen	19	Table 3-9	wouldn't we expect some ridership from Portland Ave to Tacoma Dome?	L. Kaster	
36	3 Transportation Environmen	29	Table 3-13	WSDOT owns the intersection and will be taking over maintenance after the SR 167 extension is completed.	B. Churchill	
37	3 Transportation Environmen	30	Table 3-13	The COT Portland Ave Freight project will be removing the east leg of the intersection.	B. Churchill	
38	3 Transportation Environmen	30	Table 3-13	The COT Portland Ave Freight project will be signalizing the intersection. Was this modeled as stop or signal?	B. Churchill	
39	3 Transportation Environmen	30	Table 3-13	The COT Puyallup Ave project will be signalizing the intersection. Was this modeled as a two-way stop or signal?	B. Churchill	
40	3 Transportation Environmen	30	Table 3-13	Why is the on-ramp considered WSDOT and the off-ramp considered Tacoma?	B. Churchill	
41	3 Transportation Environmen	37	Figure 3-9	close proximity intersections to be considered in mitigation options	B. Kidd	
42	3 Transportation Environmen	37	Figure 3-9	planned mitigation, especially relative to station option and related circulation flow?	B. Kidd	
43	3 Transportation Environmen	37	Figure 3-9	suggest signal control for off-ramp?	B. Kidd	
44	3 Transportation Environmen	37	Figure 3-9	suggests signal control as result of any of the station alts, but is also a control planned to be part of Puyallup Corridor project (possible earliest start in 2027)	B. Kidd	
45	3 Transportation Environmen	37	Figure 3-9	Why wasn't the intersection of E C St & Puyallup Ave evaluated?	B. Churchill	
46	3 Transportation Environmen	38	Figure 3-10	already signal controlled, mitigation envisioned?	B. Kidd	
47	3 Transportation Environmen	38	Figure 3-10	close proximity intersections to be considered in mitigation options	B. Kidd	
48	3 Transportation Environmen	38	Figure 3-10	unfunded construction for new signal at this ramp only	B. Kidd	
49	3 Transportation Environmen	38	Figure 3-10	Was this modeled as a signal or two-way stop control?	B. Churchill	
50	3 Transportation Environmen	39	Figure 3-10	Dome	B. Churchill	
51	3 Transportation Environmen	42		new signal along relatively short segment with heavy traffic and truck use, so need assurance that introducing a new signal (in close proximity to other ints/signals) will still permit for corridor flow	B. Kidd	
52	3 Transportation Environmen	42		this description suggests this intersection is already signalized, which it is not	B. Kidd	
53	3 Transportation Environmen	43		E 25 St? The intersection of E 27 St is already a signal. If E 25 St, the Portland Ave Freight project will be removing the east leg from connecting to Portland Ave.	B. Churchill	
54	3 Transportation Environmen	43		Part of the proposed COT Puyallup Ave project.	B. Churchill	
55	3 Transportation Environmen	43		suggesting an abundance of signal control within a relatively short segment of Portland Avenue with largely used intersections at each end (Puyallup & I-5)	B. Kidd	
56	3 Transportation Environmen	43		The off-ramp is part of the proposed COT Portland Ave Freight project.	B. Churchill	
57	3 Transportation Environmen	43		What construction? Not aware of any construction being completed at the Pioneer Way intersection in many years (~2012).	B. Churchill	
58	3 Transportation Environmen	44		also needs to consider impacts to access and circulation to Tacoma Dome area for events occurring during construction times	B. Kidd	
59	3 Transportation Environmen	47		but for those that would drive anyway, it allows for an option to access the station directly without having their short ped portion of the overall trip to have to unnecessarily interact with other modes at street level/other crossings	B. Kidd	
60	3 Transportation Environmen	47		Does not address bike connectivity to stations - also too much focus is on bridges rather than on-street connections that will be vital to enhance safety & accessibility	L. Kaster	

Tacoma Dome Link Extension

Comment Form for Tribal and Cooperating Agency Review of Administrative Draft EIS - Main Volume

Reviewing Tribe/Agency: City of Tacoma ***Comments Due: February 10, 2025***

#	ADEIS Chapter/Section	PDF Page No.	Figure/ Table No.	Comment	Reviewer	Action Taken
61	3 Transportation Environmen	47		If this is the bridge between the parking garage & station -- that would largely support people driving, not peds	L. Kaster	
62	3 Transportation Environmen	47		improved bicycle access, and safety and accessibility enhancements at crossings	L. Kaster	
63	3 Transportation Environmen	47		This project will significantly increase the number of active transportation users - which is a significant impact	L. Kaster	
64	3 Transportation Environmen	48		DIscuss specific impacts to the spuyaləpabš trail - given its regional significance	L. Kaster	
65	3 Transportation Environmen	49		if there is no reasonably safe means to continue allowing for accommodate ped crossings at the location	B. Kidd	
66	3 Transportation Environmen	49		Needs clarification mitigation vs. on and off site improvements that would be required as part of the project	L. Kaster	
67	3 Transportation Environmen	52		Still many more than today	L. Kaster	
68	3 Transportation Environmen	57		update with new numbers?	L. Kaster	
69	3 Transportation Environmen	58		Consider updating - since parking utilization has changed significantly post-COVID	L. Kaster	
70	3 Transportation Environmen	63		lack of funding is the biggest limit to ped investments (not perceived or actual lack of usage)	L. Kaster	
71	4 Affected Environment	10		TPU Power highlighted the following text: "Both of the alternatives on E 25th Street would acquire properties for a bus layover facility, but only the Tacoma 25th Street-East Alternative would require relocating the power substation along E 26th Street."	J. Rempe	
72	5 Cumulative Impacts	7		Elsewhere in the document it clarifies that the system access work is not part of the TDLE project EIS - what improvements (on & off site requirements) will be made as part of the TDLE project, This project will significantly increase active transportation demand (particularly to the Portland Ave station - given it's a major change from existing land use at that location).	L. Kaster	
73	5 Cumulative Impacts	15		TPU Power highligted the following text: "Light rail service could encourage development of property in and around the project area, which could increase demand for utility services. However, local governments and public utilities have already accounted for this planned growth in adopted local land use plans and policies. Development near the project would be consistent with what is allowed in the adopted land use plans and current local development regulations. Therefore, the cumulative impacts on utilities would be negligible and in accordance with planned growth. Any increased need for utilities, such as electricity, would be mitigated by Sound Transit by working directly with public utility providers."	J. Rempe	
74	2 Alternatives Considered			The Close to Sounder option is the best overall option for Tacoma from an economic development perspective. There are fewer overall impacts to construction, utility, visual changes to the area than the other options. While there are significant permanent displacement impacts to businesses, this is not the only item that needs to be considered in terms of business impacts.	D. Bingham	
75	2 Alternatives Considered			The other station options would also have significant impacts to the businesses during the entire term of the construction, potentially causing the permanent closure of businesses due to lack of accessibility and lack of foot traffic, even as they try and stay open. The full closure of E. 25th street, including access to Freight house square ensures these disruptions.	D. Bingham	

Tacoma Dome Link Extension

Comment Form for Review of Draft EIS - APPENDICES/TECHNICAL REPORTS

Reviewing Tribe/Agency: City of Tacoma ***Comments Due: February 10, 2025***

#	Appendix	PDF Page No.	Figure/ Table No.	Comment	Reviewer	Action Taken
1	Apdx F Conceptual Design Drawings	All	All	Portions of the project to be located within City of Tacoma street ROW will require a Franchise Agreement and/or Right of Use Agreement.	D. Harrison	
2	Apdx F Conceptual Design Drawings	All	All	Portions of the project to be located on City of Tacoma easement or fee simple rights that interfere with existing City of Tacoma infrastructure will require relocation per City of Tacoma's direction and at ST's expense. This also may require ST to acquire new rights for the City per City of Tacoma's direction and at ST's expense.	D. Harrison	
3	Apdx F Conceptual Design Drawings	All	All	Portions of the project to be located on City of Tacoma easement or fee simple rights that do not interfere with existing City of Tacoma infrastructure will require property rights from the City, which will include fair market value consideration from ST.	D. Harrison	
4	Apdx F Conceptual Design Drawings	A00-KAP11		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
5	Apdx F Conceptual Design Drawings	A00-KAP12		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
6	Apdx F Conceptual Design Drawings	A00-KAP13		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
7	Apdx F Conceptual Design Drawings	A00-KAP13		Tacoma Power 115kV Transmission line - to be relocated in order to avoid crossing over an occupied building/structure J Rempe 2025-01-21 May consider constructing along the propose Wapato Wy frm 8th St to 12th & 62nd - S on 62nd to SR99 then West to existing line.	J. Rempe	
8	Apdx F Conceptual Design Drawings	A00-KAP14		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
9	Apdx F Conceptual Design Drawings	A00-KAP14		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track & service to TPSS. J Rempe 2025-01-21	J. Rempe	
10	Apdx F Conceptual Design Drawings	A00-KAP14		Tacoma Power UG 12.5kV lines - Will review construction impact in area - J Rempe 2025-01-21	J. Rempe	
11	Apdx F Conceptual Design Drawings	A00-KAP15		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
12	Apdx F Conceptual Design Drawings	A00-KAP16		Tacoma Power - 2 x 230kV Lines - extent of affected structures to be determined. High impact to Tacoma Power operations. J Rempe 2025-01-21	J. Rempe	
13	Apdx F Conceptual Design Drawings	A00-KAP16		Tacoma Power UG 12.5kV lines - Will review construction impact in area - J Rempe 2025-01-21	J. Rempe	
14	Apdx F Conceptual Design Drawings	A3B-KAP14		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
15	Apdx F Conceptual Design Drawings	A3B-KAP14		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track & service to TPSS. J Rempe 2025-01-21	J. Rempe	
16	Apdx F Conceptual Design Drawings	A3B-KAP14		Tacoma Power UG 12.5kV lines - Will review construction impact in area - J Rempe 2025-01-21	J. Rempe	
17	Apdx F Conceptual Design Drawings	A3B-KAP15		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
18	Apdx F Conceptual Design Drawings	A3B-KAP16		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
19	Apdx F Conceptual Design Drawings	A3B-KAP16		Tacoma Power - 2 x 230kV Lines - extent of affected structures to be determined. High impact to Tacoma Power operations. J Rempe 2025-01-21	J. Rempe	
20	Apdx F Conceptual Design Drawings	D00-KAP05		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
21	Apdx F Conceptual Design Drawings	D00-KAP05		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track & service to TPSS. J Rempe 2025-01-21	J. Rempe	
22	Apdx F Conceptual Design Drawings	D00-KAP05		Tacoma Power UG 12.5kV lines - Will review construction impact in area - J Rempe 2025-01-21	J. Rempe	

Tacoma Dome Link Extension

Comment Form for Review of Draft EIS - APPENDICES/TECHNICAL REPORTS

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#	Appendix	PDF Page No.	Figure/ Table No.	Comment	Reviewer	Action Taken
23	Apdx F Conceptual Design Drawings	D00-KAP05		Tacoma Power 115kV Transmission line - to be relocated in order to avoid crossing over an occupied building/structure J Rempe 2025-01-21 May consider constructing along the propose Wapato Wy frm 8th St to 12th & 62nd - S on 62nd to SR99 then West to existing line. J Rempe 2025-01-21	J. Rempe	
24	Apdx F Conceptual Design Drawings	D00-KAP06		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
25	Apdx F Conceptual Design Drawings	D00-KAP06		Tacoma Power UG 12.5kV lines - Will review construction impact in area - J Rempe 2025-01-21	J. Rempe	
26	Apdx F Conceptual Design Drawings	D00-KAP07		Tacoma Power OH 12.5kV lines - Will evaluate remaining Overhead vs. underground. J Rempe 2025-01-21	J. Rempe	
27	Apdx F Conceptual Design Drawings	D00-KAP08		Tacoma Power - 2 x 230kV Lines - extent of affected structures to be determined. High impact to Tacoma Power operations. J Rempe 2025-01-21	J. Rempe	
28	Apdx F Conceptual Design Drawings	85	A03-ASP101	confirm whether or not WSDOT (I-5) has any access restriction limitation area affecting use of E 27th St	B. Kidd	
29	Apdx F Conceptual Design Drawings	85	A03-ASP101	lighting of intersection beneath new overhead span?	B. Kidd	
30	Apdx F Conceptual Design Drawings	85	A03-ASP101	One-way roadways - Typical to all alternatives	B. Churchill	
31	Apdx F Conceptual Design Drawings	86	A03-APP101	needs more "definition"/delineation from roadway/public travel way and bus bays area	B. Kidd	
32	Apdx F Conceptual Design Drawings	86	A03-APP101	enough capacity per Transportation analysis?	B. Kidd	
33	Apdx F Conceptual Design Drawings	92	A04-APP101	any preserved/new mid-block crossings need to be made fully accessible	B. Kidd	
34	Apdx F Conceptual Design Drawings	92	A04-APP101	these support columns seem to be where existing T-Line runs, so is it being moved to be in the shared lane as part of this station plan?	B. Kidd	
35	Apdx F Conceptual Design Drawings	93	A04-APP102	why optional? why not take adv of the raised station to allow for as many direct/unconflicted points of routing/access for peds?	B. Kidd	
36	Apdx F Conceptual Design Drawings	93	A04-APP102	already developed...any diffs from expected?	B. Kidd	
37	Apdx F Conceptual Design Drawings	95	A04-ASX101	lighting plan for along E 25th St under the station/elevated railway?	B. Kidd	
38	Apdx F Conceptual Design Drawings	106	FA-ASP102	Existing TPU substation. Might be difficult to relocate for a bus parking lot.	B. Churchill	
39	Apdx F Conceptual Design Drawings	119	E00-ASP101	why optional? provides more direct access for portion of would-be ped traffic that then might have to conflict with other modes at-grade	B. Kidd	
40	Apdx F Conceptual Design Drawings	119	E00-ASP101	roadway lighting dynamics in this area of two overpasses, with break in between and signal (at 25th/G) just downstream?	B. Kidd	
41	Apdx F Conceptual Design Drawings	120	E00-ASP102	Show T Line tracks	B. Churchill	
42	Apdx F Conceptual Design Drawings	120	E00-ASP102	preserved or new mid-block crossings to be of control type that is accessible to all	B. Kidd	
43	Apdx F Conceptual Design Drawings	120	E00-ASP102	consider inbound one-flow given this access point's proximity to signal at Puyallup/G St?	B. Kidd	
44	Apdx F Conceptual Design Drawings	120	E00-ASP102	already reconstructed back-in angle parking	B. Kidd	
45	Apdx F Conceptual Design Drawings	120	E00-ASP102	roadway lighting dynamics in this area of two overpasses, with break in between and signal (at 25th/G) just downstream?	B. Kidd	
46	Apdx F Conceptual Design Drawings	121	E00-ASP103	Show T Line tracks	B. Churchill	
47	Apdx F Conceptual Design Drawings	121	E00-ASP103	close proximity to signals at C/D St and E 25th St	B. Kidd	
48	Apdx F Conceptual Design Drawings	121	E00-ASP103	close proximity to at-grade rail crossing/potential future rail crossing provisions	B. Kidd	

Tacoma Dome Link Extension

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#	Appendix	PDF Page No.	Figure/ Table No.	Comment	Reviewer	Action Taken
49	Apdx F Conceptual Design Drawings	121	E00-ASP103	preserved, relocated, or new mid-block crossings to be of control type that is accessible to all	B. Kidd	
50	Apdx F Conceptual Design Drawings	121	E00-ASP103	roadway lighting dynamics in this area of two overpasses, with break in between and signal (at 25th/G) just downstream?	B. Kidd	
51	Apdx F Conceptual Design Drawings	122	E00-ASP104	preserved, relocated, or new mid-block crossings to be of control type that is accessible to all	B. Kidd	
52	Apdx F Conceptual Design Drawings	122	E00-ASP104	with E 25th St as transit only use, how does negated garage entry/exit affect garage ops/overall traffic routing for the area?	B. Kidd	
53	Apdx F Conceptual Design Drawings	122	E00-ASP104	ok for station to be on the actual approach to signal control intersection? (usually set back/upstream from them)	B. Kidd	
54	Apdx F Conceptual Design Drawings	122	E00-ASP104	roadway lighting dynamics in this area of two overpasses, with break in between and signal (at 25th/G) just downstream?	B. Kidd	
55	Apdx F Conceptual Design Drawings	126	E00-ASX101	Show T Line?	B. Churchill	
56	Apdx F Conceptual Design Drawings	126	E00-ASX101	Drawing is cutoff	B. Churchill	
57	Apdx F Conceptual Design Drawings	127	E00-ASX101	Drawing is cutoff	B. Churchill	
58	Apdx F Conceptual Design Drawings	127	E00-ASX101	Show T Line?	B. Churchill	
59	Apdx F Conceptual Design Drawings	142	GA-ASX101	Show T Line?	B. Churchill	
60	Apdx F Conceptual Design Drawings	A00-KAP18		Any chance to rotate the sheets so that the North Arrow is up? - Typical	B. Churchill	
61	Apdx F Conceptual Design Drawings	A00-KAP18		Tacoma Power 115kV Transmission line -will evaluate raising crossing - J Rempe 2025-01-21	J. Rempe	
62	Apdx F Conceptual Design Drawings	A00-KAP19		This construction of the off-ramp was just completed.	B. Churchill	
63	Apdx F Conceptual Design Drawings	A00-KAP19		This side of the intersection will be closed with the Portland Ave Freight and Access project.	B. Churchill	
64	Apdx F Conceptual Design Drawings	A00-KAP19		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
65	Apdx F Conceptual Design Drawings	A00-KAP20		Tacoma Power 115kV Transmission line - May consider relocating to E 26th as far back as E D St. OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
66	Apdx F Conceptual Design Drawings	A00-KAP20		Tacoma Power UG 12.5kV lines - Will review construction impact in area - J Rempe 2025-01-21	J. Rempe	
67	Apdx F Conceptual Design Drawings	A00-KAP20		Tacoma Power 115kV Transmission line - To evaluate the raising of line to accomodate structure J Rempe 2025-01-21	J. Rempe	
68	Apdx F Conceptual Design Drawings	A00-KAP21		Tacoma Power 115kV Transmission line - May consider relocating to E 26th as far back as E D St. OH 12.5kV lines from E G St East - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
69	Apdx F Conceptual Design Drawings	E0A-KAP19		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	
70	Apdx F Conceptual Design Drawings	E0A-KAP20		as new grades of bridge to account for L St serving as multimodal (ped/bike) corridor	B. Kidd	
71	Apdx F Conceptual Design Drawings	E0A-KAP20		Tacoma Power 115kV Transmission line - To evaluate the raising of line to accomodate structure J Rempe 2025-01-21	J. Rempe	
72	Apdx F Conceptual Design Drawings	E0A-KAP21		Tacoma Power UG 12.5kV lines - substation feeder getaway- Will review construction impact in area - J Rempe 2025-01-21	J. Rempe	
73	Apdx F Conceptual Design Drawings	E0A-KAP21		Tacoma Power UG 12.5kV lines - Will review construction impact in area - J Rempe 2025-01-21	J. Rempe	
74	Apdx F Conceptual Design Drawings	F0A-KAP19		Tacoma Power OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	

Tacoma Dome Link Extension

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#	Appendix	PDF Page No.	Figure/ Table No.	Comment	Reviewer	Action Taken
75	Apdx F Conceptual Design Drawings	F0A-KAP20		Tacoma Power 115kV Transmission line - May consider relocating to E 26th as far back as E D St. OH 12.5kV lines - Recommend converting to underground to accommodate construction of elevated track. J Rempe 2025-01-21	J. Rempe	

Reviewer	Full Name	Department	Division						
B. Churchill	Brian Churchill	Public Works	Traffic Engineering						
B. Kidd	Brennan Kidd	Public Works	Traffic Engineering						
D. Harrison	Dylan Harrison	Public Works	Real Property Services						
D. Gust	Derek Gust	Tacoma Fire	Fire Engineering Services						
J. Rempe	Joe Rempe	Tacoma Power	T&D						
L. Kaster	Liz Kaster	Public Works	Active Transportation						
S. Moeller	Scott Moeller	Public Works	Traffic Engineering						
S. Zhang	Simon Zhang	Public Works	Traffic Engineering						
D. Bingham	Debbie Bingham	Community and Economic Development	Economic Development Services						

Additional attachments not included in this PDF due to size

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Region Office
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

February 10, 2025

Elma Borbe, Senior Environmental Planner
Sound Transit
401 S Jackson St
Seattle, WA 98104

Re: Comments on the Tacoma Dome Link Extension Project

Dear Elma Borbe:

Thank you for the opportunity to provide comments on the National Environmental Policy Act (NEPA) and State Environmental Policy Act (SEPA) draft Environmental Impact Statement for the Tacoma Dome Link Extension (TDLE) Project. Based on review of the documents associated with this project, the Department of Ecology (Ecology) has the following comments for your consideration.

Ecology reviewed the TDLE Draft Environmental Impact Statement-Executive Summary in order to compare environmental impacts between each alternative alignment. We summarized the information from Tables ES-3, ES-4, and ES-5 for all of the TDLE design alternatives by their ecosystem impacts and presented this data in the attached Table 1. Ecosystem impacts from each build alternative were evaluated for wetlands, streams, and their associated buffers in order to compare acreage loss of wetland and buffer areas and loss of linear feet of stream channel. We highlighted the alternative with the lowest ecosystem impacts (yellow) and other alternatives that avoid high quality wetlands (green) when there was a difference between alternatives.

- This indicates that for the South Federal Way segment, the Enchanted Parkway alternative would have the lowest impacts to wetland and buffer acreages and linear feet of stream channel. If this alternative with the lowest impact to existing ecosystems was not deemed feasible due to other factors, demonstrated through avoidances and minimization, Ecology recommends alternatives that limit impacts to high value wetlands (category I and II).

- For the Fife segment, the lowest wetland impacts are identical between the Pacific Highway with 54th Avenue Option and the Pacific Highway Median with 54th Avenue Option, and the lowest impact to high value wetlands (category I and II). The lowest wetland buffer impacts occur in the I-5 with 54th Avenue Option. The least amount of stream channel impacts were identical for the I-5 with 54th Avenue Option and the I-5 with 54th Span Option.

- For the Tacoma segment, all alternatives have nearly identical wetland and buffer impacts.

Table 1. Comparison of ecosystem impacts by TDLE alternative. This table summarizes Tables ES-3, ES-4, and ES-5 from the draft EIS and includes Ecology notes. Yellow highlights the alternative with the lowest ecosystem impacts. Green highlights alternatives that avoid high quality wetlands when there was a difference between alternatives.

Segment	**Alternative**	**Wetland Impacts (acres)**	**Wetland Impact by Ecology Category (acres) (*pre-liminary rating*)**	**Wetland Buffer Impacts (acres)**	**Stream Impacts (linear feet)**	**Stream Buffer Impacts (acres)**	**Puyallup River Impacts (acres)**
South Federal Way	Enchanted Parkway	2.65	Category I: 0.16 Category II: 1.67 Category III: 0.83 Category IV: <0.01	5.79	150	2.8	-
	1-5	3.77	Category I: 0.16 Category II: 1.67 Category III: 1.93 Category IV: <0.01	8.52	950	5.6	-
	99-West	6.31	Category I: 1.11 Category II: 4.65 Category III:	11.18	500	3.7	-

			0.54 Category IV: 0.01				
	99-West Porter Way option	6.68	Category I: 1.18 Category II: 4.97 Category III: 0.54	11.38	600	4.3	-
	99-East	7.33	Category I: 1.02 Category II: 6.01 Category III: 0.30	10.95	600	4.3	-
	99-East Porter Way option	7.75	Category I: 1.09 Category II: 6.37 Category III: 0.30	11.13	700	4.7	-
Fife	Pacific Highway	2.24	Category II: 0.01 Category III: 0.97 Category IV: 1.26	3.76	450	0.2	-
	Pacific Highway with 54th Avenue Option	2.04	Category II: 0.01 Category III: 0.77 Category IV: 1.26	3.70	350	0.2	-
	Pacific Highway with 54th Span Option	2.29	Category II: 0.01 Category III: 0.87 Category IV: 1.26	3.90	350	0.2	-
	Pacific Highway Median	2.24	Category II: 0.01 Category III: 0.97	3.76	450	0.2	-

			Category IV: 1.26				
	Pacific Highway Median with 54th Avenue Option	2.04	Category II: 0.01 Category III: 0.77 Category IV: 1.26	3.70	350	0.2	-
	Pacific Highway-Median with 54th Span Option	2.29	Category II: 0.01 Category III: 1.02 Category IV: 1.26	3.90	350	0.2	-
	I-5	3.16	Category II: 0.07 Category III: 1.82 Category IV: 1.26	3.38	350	0.2	-
	I-5 with 54th Avenue Option	2.96	Category II: 0.07 Category III: 1.63 Category IV: 1.26	3.28	250	0.2	-
	I-5 with 54th Span Option	3.2	Category II: 0.07 Category III: 1.87 Category IV: 1.26	3.48	250	0.2	-
Tacoma	25th Street West	<0.01	Category III: <0.01	0.05	-	0.1	0.4
	25th Street East	<0.01	Category III: <0.01	0.05	-	0.1	0.4
	Close to Sounder	<0.01	Category III: <0.01	0.05	-	0.1	0.4
	26th Street	<0.01	Category III: <0.01	0.05	-	0.1	0.4

Section 401 Water Quality Certification and Coastal Zone Management

All activities requiring authorization by the U.S. Army Corps of Engineers, will require a section 401 Water Quality Certification and Coastal Zone Management review. Depending on the permit pathway the Corps decides to take, an individual Water Quality Certification may be required by Ecology on all work not on tribal trust land. For work on tribal trust land, reach out to the Puyallup Tribe of Indians. For any wetlands over which the U.S. Army Corps of Engineers does not take jurisdiction, contact Ecology to determine compliance with the provisions of RCW 90.48.

The preferred mitigation sequencing is avoidance, minimization, and then compensatory mitigation for any unavoidable wetland impacts associated with a project. Please follow the mitigation sequence by practicing avoidance of wetland impacts to the maximum extent practicable. Then, demonstrate why avoidance and minimization was not possible to justify the proposed impacts and its compensatory mitigation. Ecology understands that other factors, like cultural resources, are considered when choosing the preferred alternative. These other factors should be included in demonstrating why certain wetland impacts could not be avoided. Compensatory mitigation should follow the mitigation guidance described in Wetland Mitigation in Washington State: Part 1 - Agency Policies and Guidance. This guidance indicates that in-lieu fee is preferred over permittee-responsible mitigation, such as the King County mitigation reserves program.

Shoreline Permitting

Multiple sections of this project appear to fall under shoreline jurisdiction. Shorelines of the state include upland areas (shorelands) that extend 200 feet landward from the edge of these waters and any associated wetlands. Wetlands are associated and regulated through the Shoreline Mater Program if the wetland is either fully or partially within the 200 feet of the ordinary high water mark, the wetland is in a floodplain of the shoreline, or the wetland is associated through hydraulic continuity.

- South Federal Way Segment (Pierce County portion only) – All alternatives appear to be within the following shoreline jurisdictions: Pierce County at the Hylebos Crossing (note this is also in the City of Fife's urban growth area) and City of Milton at Hylebos Creek along I-5 (north of 70th Avenue to where the creek crosses under I-5).

- Fife Segment – All alternatives do not appear to fall within any shoreline jurisdiction

- Tacoma Dome Segment – All alternatives are *potentially* within the following shoreline jurisdictions: City of Tacoma, City of Fife, Puyallup Tribe of Indians at the Puyallup River crossing.

Please coordinate with the local jurisdiction to ensure compliance with their Shoreline Master Programs and to obtain all the necessary local permits.

Solid Waste Management

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department or Ecology for proper management of these materials.

Thank you for considering these comments from Ecology. If you have any questions or would like to discuss these comments, please contact me at (425) 681-6236 or by email at meg.bommarito@ecy.wa.gov.

Sincerely,

Meg Bommarito
Regional Planner

Sent by email: Elma Borbe, tdlinkdeis@soundtransit.org

ecc: Doug Gresham, Ecology
Brook Swensen, Ecology
Meg Bommarito, Ecology
Derek Rockett, Ecology

Washington State Department of Transportation

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February 10th, 2025

Sound Transit, TDLE Project
c/o Erin Green, South Corridor Environmental Manager
401 S. Jackson St., Seattle, WA 98104

RE: Tacoma Dome Link Extension, Draft Environmental Impact Statement Review

The Washington State Department of Transportation (WSDOT) is pleased to provide comments on the Draft Environmental Impact Statement (DEIS) for the Tacoma Dome Link Extension (TDLE) Project. This project aligns with WSDOT's vision of providing a sustainable and integrated multimodal transportation system.

Some key priorities from the comments attached are listed below:

1. WSDOT is highly concerned about the implications of the Close to Sounder station alternative related to the quality and operations of the Amtrak Cascades service, including Federal Railroad Administration obligations. The Tacoma Dome station was designed with significant community input, and its potential destruction would likely affect the trust and sense of community pride built during that process. As such, WSDOT is requesting that Sound Transit further develop very clear mitigation strategies for the Close to Sounder option, addressing both ongoing Amtrak Cascades operations during construction and plans for replacement of the station, in consultation with the WSDOT Rail, Freight, and Ports division prior to confirming or modifying the preferred alternative for the Tacoma Segment.
2. The WSDOT SR 167 Completion Project and associated Hylebos Riparian Restoration Program (RRP) should be significantly discussed as there is substantial overlap with this proposal. The western segment of SR 167 between SR 509 and I-5 (Stage 1b) is scheduled to be open to traffic in 2026 and may need to be reflected in the project's Record of Decision (ROD). Some of the Hylebos RRP mitigation site properties will be transferred to the Puyallup Tribe of Indians (PTOI) by mid-2028. Appropriate mitigation for TDLE project impacts to the Hylebos RRP will require explanation in the project's ROD and coordination with both WSDOT and the PTOI.
3. Language regarding parking facilities originally planned as a part of this project will require refinement as the types of facilities, specific locations, and timing are all uncertain at the time of this DEIS. WSDOT should be engaged prior to developing mitigation strategies if there are proposed impacts to WSDOT property and impacts to traffic volumes. WSDOT policy documents should be used for any traffic analysis of WSDOT facilities. WSDOT looks forward to reviewing the files produced from traffic analysis programs in support of TDLE project development.
4. WSDOT complies with the Washington State Department of Ecology's (Ecology) stormwater guidance and expects that Sound Transit's project will follow Ecology's July

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2024 Stormwater Manual for Western Washington (or other manual determined to be equivalent to by Ecology) when designing any project elements on WSDOT property.

5. The Compatibility Report for this project is still outstanding. This report helps ensure that Sound Transit's plans on WSDOT property are compatible with WSDOT's existing assets and do not restrict WSDOT's future interests. The report is a documented understanding between the agencies to ensure each has the space needed to build and maintain their respective transportation systems. Additionally, WSDOT uses this report to coordinate with the Federal Highway Administration (FHWA).

Please contact Jessica Giblin, WSDOT Regional Transit Coordination Division (RTCD) environmental liaison, with any questions regarding this letter or the attached comments.

WSDOT appreciates the opportunity to comment and looks forward to continuing our collaboration with Sound Transit.

Sincerely,

Cordelia Crockett

Cordelia Crockett, WSDOT RTCD Director
cordelia.crockett@wsdot.wa.gov

Enclosures – Comment sheet and graphics (one PDF)

cc: Jessica Giblin, WSDOT/Sound Transit Environmental Liaison Jessica.Giblin@wsdot.wa.gov
Zak Grffith, WSDOT RTCD Project Engineer Zak.Griffith@wsdot.wa.gov

Sound Transit's Tacoma Dome Link Extension Project - Draft EIS Review

WSDOT comments. Contact Jessica Giblin - jessica.giblin@wsdot.wa.gov

#	DEIS Chapter	Page	Figure/Table	Comment	Reviewer
1	4.8.3.3	4.8-21		If you can demonstrate the potential impact by numbers, please provide quantitative information.	Kyungseop Shin- WSDOT NWR Hydraulics
2		4.9-24,35	4.9-2, 4.9-5	In notes or table, call out any stream/buffer impacts to the WSDOT 167 riparian restoration site.	Victoria Book - WSDOT OLY Environmental
3	4.9.3.2	4.9-32,33		Include any impacts to the WSDOT 167 riparian restoration site within the wetlands discussion.	Victoria Book - WSDOT OLY Environmental
4	3	3-12		There are not bike lanes on SR 161. Some spots include a shoulder that accommodates bicycles, but it is not a bike facility.	Jennifer Nyerick, WSDOT NWR Traffic
5	3	3-45		Roundabout design for the WSDOT Triangle Project would include pedestrian facilities. How is station accessibility expected to be reduced by their presence?	Jennifer Nyerick, WSDOT NWR Traffic
6	4	4.17-3		"*TDLE would make no physical changes to any existing park or recreational resource. However, with some alternatives, some elevated track and columns would be located adjacent to or in open space and natural areas. Elevated track and columns would add a new visual element and columns would create a physical obstruction on some portion of the property*". These new columns could have physical impacts and would be permanently incorporated into the transportation facility. Constructing these would require some ground disturbance which is considered a physical impact if in the boundaries of any park. If these impacts are outside the boundaries of the park, please specify this next to "open space and natural areas".	Kerri Wheeler, WSDOT HQ NEPA/SEPA
7	3	3-7		Section 3.1.3.2 - Amtrak Cascades runs six daily trips, not four. https://www.amtrakcascades.com/about	Roger Baugh, WSDOT OLY Planning
8	3	3-25		Section 3.3.1.2 discusses temporarily moving the train boarding area. The 350 feet noted is approximately the distance from the current Amtrak and Sounder stations to D Street and is realistic for the temporary station shift under the Close to Sounder alternative. The boarding area may not shift by the same distance, depending on where the trains would actually stop during construction and if they would be allowed to block D Street during boarding.	Roger Baugh, WSDOT OLY Planning
9	3	3-40 to 3-43		Section 3.4.2 notes intersections which would require mitigation. For WSDOT intersections, change in intersection configuration or control would require an Intersection Control Evaluation (ICE) be completed. It is possible that the ICE process may result in mitigation which is not discussed in the DEIS.	Roger Baugh, WSDOT OLY Planning
10	4.2	4.2-8		"*Future growth, which is expected to gain 127,000*". Revise to "future growth, which is expected to result in the gain of 127,000".	Roger Baugh, WSDOT OLY Planning
11	4.3			In the discussions of the two bridge type alternatives across the Puyallup River, cost is not described. A cost-benefit analysis would be a helpful tool to add here.	Roger Baugh, WSDOT OLY Planning
12	4.3	4.3-14		The first bullet concerning fish habitat notes fishing rights for both the Puyallup (PTOI) and the Muckleshoot tribes (MIT), then the PTOI is discussed throughout. Consider explaining why the MIT is not discussed again in this chapter.	Roger Baugh, WSDOT OLY Planning
13	Executive Summary	ES-30		The Executive Summary states that the Close to Sounder option would require temporarily relocating the Amtrak and Sounder stations to the west end of Freighthouse Square. Is this referring to where the tea house is currently? How will this be converted into a station? Would it be a joint Sounder/Amtrak station?	Lora Foster, WSDOT Rail, Freight, & Ports
14	Executive Summary	ES-32	Table ES-5	For the potential street closures, it would be helpful for WSDOT to know what sections of E 25th St will be closed for each project, specifically so we can identify which would require closure in front of the Amtrak station.	Lora Foster, WSDOT Rail, Freight, & Ports
15	Executive Summary	ES-45	Table ES-6	Do the cost estimates for the Close to Sounder option include costs to repay the Federal Railroad Administration for federal funds used in the construction of the Tacoma Dome Station?	Lora Foster, WSDOT Rail, Freight, & Ports
16	Alternatives Considered	2-28	Figure 2-31	States "Sounder/Amtrak" on the Portland Ave Span Station Option; however, it is not clear that it is identifying the *tracks* that Sounder/Amtrak use, rather than a station or other facility.	Lora Foster, WSDOT Rail, Freight, & Ports
17	Alternatives Considered	2-31		Paragraph 2 states that Freighthouse Square (FHS) west and east of the Amtrak station would be demolished; however, in ES-30 it states that the Amtrak and Sounder stations would be temporarily relocated to the west end of FHS. How are the stations to be relocated to the west end of FHS if it is to be demolished?	Lora Foster, WSDOT Rail, Freight, & Ports

18	Alternatives Considered	2-47		Paragraph 2 of 2.5.5, which addresses the construction approach for the Tacoma Close to Sounder station, should mention the need to establish a temporary Amtrak/Sounder station during construction.	Paul Krueger, WSDOT Rail, Freight, & Ports
19	Transportation Environment	3-11		Tacoma Rail no longer owns or operates the Mountain Division. The part of the Mountain Division within the study area may be out of service.	Paul Krueger, WSDOT Rail, Freight, & Ports
20	Transportation Environment	3-25		The second paragraph of Section 3.3.1.2 states that Amtrak and Sounder stations would need to be demolished and temporarily relocated to 350 feet west of the current station location. Can Sound Transit clarify what this means? Page 2-31 states that the FHS building west of the Amtrak station would be demolished. Would the west end of FHS be demolished then built into a temporary shared station? Would the current west end of FHS (the tea shop) be used as a temporary shared station? Would the platform 350 feet west of the current Amtrak station be used for boarding/deboarding while the temporary station is located elsewhere?	Lora Foster, WSDOT Rail, Freight, & Ports
21	Transportation Environment	3-49		How will Amtrak and Sounder passengers access the second platform at Tacoma Dome Station while the East D Street pedestrian crossing is closed during construction?	Lora Foster, WSDOT Rail, Freight, & Ports
22	Transportation Environment	3-49		How might construction affect non-motorized access to the Sounder/Amtrak station, especially for the temporary station that would be used if the Tacoma Close to Sounder station is constructed?	Paul Krueger, WSDOT Rail, Freight, & Ports
23	Affected Environment	4.2-9		Might construction of the Tacoma Close to Sounder station require a temporary easement or land acquisition to provide a temporary Amtrak/Sounder station? If so, this should be mentioned.	Paul Krueger, WSDOT Rail, Freight, & Ports
24	Affected Environment	4.3-7		The discussion about the Tacoma Close to Sounder Alternative states that Freighthouse Square accounts for about 30 business displacements. Later in the document, it says it would displace 31 businesses in the building. Please verify this number.	Paul Krueger, WSDOT Rail, Freight, & Ports
25	Affected Environment	4.4-17		Paragraph 3 states that the Close to Sounder option would displace 31 businesses; however, this report has previously stated multiple times that the Close to Sounder option would displace 43 businesses. Should clarify that the 31 businesses are just for Freighthouse Square.	Lora Foster, WSDOT Rail, Freight, & Ports
26	Affected Environment	4.4-20		ES-32 indicates that all of the Tacoma station location options, including Close to Sounder, would require closure of East 25th Street; however, the first paragraph of 4.4-20 indicates that the Close to Sounder option would avoid the full closure of East 25th Street. Requesting that Sound Transit clarify.	Lora Foster, WSDOT Rail, Freight, & Ports
27	Affected Environment	4.12-7		The location description for the Amtrak station relocations site is the same as the description of the Freighthouse Square site, where the current station is located. Is this correct? If so, some more specific information about the location of these two sites within these common boundaries would be helpful.	Paul Krueger, WSDOT Rail, Freight, & Ports
28	Cumulative Impacts	5-5		Please also mention WSDOT's planning for increasing Amtrak Cascades service. The Preliminary Service Development Plan released last June includes up to 16 roundtrips serving Tacoma. The last State Rail Plan (2020) included up to 13 roundtrips. *https://wsdot.wa.gov/sites/default/files/2024-06/Amtrak-Cascades-2024-Preliminary-Service-Development-Plan.pdf*	Paul Krueger, WSDOT Rail, Freight, & Ports
29	Station Area Planning Report - Part 2	81 and 82		It appears the location of the Amtrak station may be misidentified on the maps, unless these drawings are attempting to show a location where the Amtrak station would be relocated to?	Lora Foster, WSDOT Rail, Freight, & Ports
30	Present and Reasonably Foreseeable Actions	G-11		The Amtrak Cascades Preliminary Service Development Plan was completed in June 2024 and includes up to 16 daily roundtrips serving Tacoma. WSDOT is continuing this planning work with a detailed Service Development Plan funded by the Federal Railroad Administration's Corridor Identification and Development Program. Please update line 57 in Table G-1 accordingly.	Paul Krueger, WSDOT Rail, Freight, & Ports
31	Executive Summary	ES-12	Figure ES-4	Show SR 167 extension here and on other Executive Summary maps	Aaron Fieser, WSDOT SR 167 Completion Project
32	Executive Summary	ES-13	Figure ES-4	Add labels for Hylebos Creek	Aaron Fieser, WSDOT SR 167 Completion Project
33	Executive Summary	ES-14	Figure ES-4	[In reference to the "Public Parks and Open Space" category on the legend] Would SR 167 Stage 1b and Stage 2 mitigation sites fall in this category once constructed and need to be shown on map?	Aaron Fieser, WSDOT SR 167 Completion Project
34	Executive Summary	ES-15, ES-20	Tables ES-2, ES-3	Under Ecosystem Resources, include a row for impacts to Hylebos Riparian Restoration Program (RRP) Mitigation Site.	Vivian Erickson, WSDOT SR 167 Completion Project
35	Executive Summary	ES-16		[Last paragraph] Include discussion on how the alternatives impact the Hylebos RRP Mitigation Site and how impacts to the RRP would be permitted/approved with consideration of performance requirements and deed restrictions that will be in place.	Vivian Erickson, WSDOT SR 167 Completion Project

36	Executive Summary	ES-18	Figure ES-6	[See attached marked up figure] What alternatives were considered to avoid impacts to WSDOT's Hylebos RRP Mitigation Site?	Vivian Erickson, WSDOT SR 167 Completion Project
37	Executive Summary	ES-18	Figure ES-6	[See attached marked up figure] Consider shifting the Fife/South Federal Way Segment line here to be closer to the eastern extent of the Fife city boundary and to include WSDOT's Hylebos RRP Mitigation Site impacts analysis within the Fife segment of the DEIS discussion. This is a confusing area as this section of SR 99 is unincorporated Pierce County (Fife limits are from east side of SR 99).	Vivian Erickson, WSDOT SR 167 Completion Project
38	Executive Summary	ES-22		See prior comment on Figure ES-6 regarding location of segment line. Impacts to Hylebos Creek would be more appropriately discussed in the Fife Segment of the DEIS.	Vivian Erickson, WSDOT SR 167 Completion Project
39	Executive Summary	ES-22		Global: The footprint is proposed through WSDOT's Hylebos RRP Mitigation Sites, which are sites protected in perpetuity. The alternatives analysis and discussion needs to include how impacts to Hylebos RRP were avoided/minimized to the extent feasible and how the project proposes to obtain approvals and mitigate for impacts to the RRP (if approved). The RRP will have site protection covenants/deed restrictions/easements in place, as required by Federal/State/and PTOI permits. Transfers of ownership to PTOI may be completed in 2028 for portions of RRP within the proposed TDLE footprint. See GCB-3437 Intergovernmental Agreement between WSDOT and the Puyallup Tribe of Indians: https://ftp.wsdot.wa.gov/contracts/9540-I-5toSR509NewExpressway/ConformedRFP/Appendices/I/I5/I5-GCB3437-IGA-btwn-WSDOT-PTOI.pdf Additionally, of the two Middle Hylebos and Lower Hylebos South sites, only the Lower Hylebos South site will get transferred to the tribe.	Aaron Fieser, WSDOT SR 167 Completion Project
40	Executive Summary	ES-24	Figure ES-7	Recommend shifting the Fife/South Federal Way Segment line to be closer to the eastern extent of the Fife city boundary and to include WSDOT's Hylebos RRP Mitigation Site impacts analysis within the Fife segment of the DEIS discussion.	Vivian Erickson, WSDOT SR 167 Completion Project
41	Executive Summary	ES-36		[Under Ecosystems paragraph] See prior comment regarding avoidance, minimization, and mitigation for impacts to Hylebos RRP.	Vivian Erickson, WSDOT SR 167 Completion Project
42	Executive Summary	ES-36		[Under Water Resources paragraph] See WSDOT's SR 167 Stage 1b CLOMR with planned revisions to FEMA maps near the Federal Way/Fife segment area.	Aaron Fieser, WSDOT SR 167 Completion Project
43	Executive Summary	ES-37		[Under Historic and Archaeological Resources] If needed, WSDOT may be able to share information of the resources found during the SR 167 Stage 1b Project and proximity to planned alignments.	Aaron Fieser, WSDOT SR 167 Completion Project
44	Executive Summary	ES-38		Any temporary or permanent impacts to Hylebos RRP will need to be avoided or fully mitigated, if approved, but flagging in case RRP impacts need to be discussed in these bullets.	Vivian Erickson, WSDOT SR 167 Completion Project
45	Executive Summary	ES-43		[In the ES.8 Areas of Controversy and Issues to Be Resolved bulleted list] Suggest adding bullet on "Coordination with WSDOT, PTOI, and Regulatory Agencies on Location/Impacts to Hylebos RRP Mitigation Site".	Vivian Erickson, WSDOT SR 167 Completion Project
46	Executive Summary	ES-43		[In the "Location of Guideway within WSDOT Right-of-Way" section] "Portions of some of the alternatives in the Federal Way, South Federal Way, and Fife segments are anticipated to be within WSDOT right-of-way along I-5." Add ", SR 99, and SR 167" at the end after "I-5." Add "and Hylebos RRP Mitigation Sites" after "Location of Guideway within WSDOT Right-of-Way" or consider adding separate bullet.	Aaron Fieser, Vivian Erickson, WSDOT SR 167 Completion Project
47	3. Transportation Environment and Consequences	3-9		[In the Fife Segment section] The south leg of the existing 70th Avenue E and SR 99 was relocated to the Wapato Way E/SR 99 roundabout. But the north leg still remains at the 70th Avenue E/SR 99. These two intersections should be analyzed and documented separately.	Te Ma, WSDOT SR 167 Completion Project
48	3. Transportation Environment and Consequences	3-10	Table 3-5	[For #25] The AM should be modeled.	Te Ma, WSDOT SR 167 Completion Project
49	4. Affected Environment and Environmental Consequences	4.1-6		[First paragraph, last sentence about easements] Portion of Hylebos RRP (Lower Hylebos South) where TDLE would impact will be conveyed to PTOI. Consider whether discussion on easement within mitigations sites (if allowed) should be included here.	Vivian Erickson, WSDOT SR 167 Completion Project

50	4. Affected Environment and Environmental Consequences	4.8-7	Table 4.8-1	Note recent determinations by WDFW that Fife Ditch is non-fish bearing.	Vivian Erickson, WSDOT SR 167 Completion Project
51	4. Affected Environment and Environmental Consequences	4.8-8		[Under 4.8.2.2 Floodplains and Floodways section] Add mention of pending LOMR for Flood Insurance Rate Maps associated with Hylebos Creek between Porter Way and 4th Street E. as result of SR 167 Completion Project construction, which reflect updates to current streamflow conditions in addition to SR 167 Project effects on existing Zone AE floodplain areas.	Mark Ewbank, WSDOT SR 167 Completion Project
52	4. Affected Environment and Environmental Consequences	4.8-14		[At the end of the Sea Level Rise section] Add more here regarding City of Fife's Sea Level Rise Vulnerability Assessment and Adaptation Plan and what it forecasts for effects in various streams. WSDOT project team reviewed the final draft in fall 2024, so it should be final soon.	Mark Ewbank, WSDOT SR 167 Completion Project
53	4. Affected Environment and Environmental Consequences	4.8-18		Global comment: DEIS and Ecosystems Technical Report is missing discussion of impacts to Hylebos RRP Mitigation Sites, which are permitted mitigation sites with site protection mechanisms to be recorded on deeds.	Vivian Erickson, WSDOT SR 167 Completion Project
54	4. Affected Environment and Environmental Consequences	4.8-24		[For bulleted list "Strategies to minimize these impacts may include:"] What are the strategies to avoid/minimize impacts to Hylebos RRP?	Vivian Erickson, WSDOT SR 167 Completion Project
55	4. Affected Environment and Environmental Consequences	4.8-28		[Second paragraph under 4.8.4.3 South Federal Way Segment section] Either here or in Section 4.9 (ecosystems), discussion is needed on impacts to Hylebos RRP and mitigation, if impacts to RRP are approved by required entities.	Vivian Erickson, WSDOT SR 167 Completion Project
56	4. Affected Environment and Environmental Consequences	4.9-1		Update "Affected Environment" section and Ecosystems Technical Report to reflect habitat improvements that have occurred within WSDOT's Hylebos RRP. Existing conditions of the RRP from the west side of I-5 to north of SR 99 have changed and are no longer characterized accurately in the DEIS.	Vivian Erickson, WSDOT SR 167 Completion Project
57	4. Affected Environment and Environmental Consequences	4.9-7	Figure 4.9-4	Show Hylebos RRP Mitigation Sites boundary layer on ecosystem figures.	Vivian Erickson, WSDOT SR 167 Completion Project
58	4. Affected Environment and Environmental Consequences	4.9-12		[Second to last and Last paragraphs] These paragraphs overlook habitat improvement occurring now via WSDOT's Hylebos RRP construction (along both Hylebos Creek and Surprise Lake Tributary) and therefore incorrectly characterizes the existing condition from the west side of I-5 to north of SR 99.	Mark Ewbank, WSDOT SR 167 Completion Project
59	4. Affected Environment and Environmental Consequences	4.9-13		[Last paragraph] PTOI staff have recently observed Chinook salmon in the reach near Freeman Road East south of the Union Pacific Railroad. See WSDOT memo (Table 47): https://ftp.wsdot.wa.gov/contracts/XE3431-I-5toSR161NewExpresswayProject/RFP/ScheduleB/Appendices/E/E03/E03-Wet-Delin3-Stg2.pdf	Vivian Erickson, WSDOT SR 167 Completion Project
60	4. Affected Environment and Environmental Consequences	4.9-16		[Wetland Section] Add discussion of wetland restoration work undertaken to-date and planned within the Hylebos RRP.	Vivian Erickson, WSDOT SR 167 Completion Project; Victoria Book - WSDOT Olympic Region Environmental
61	4. Affected Environment and Environmental Consequences	4.9-17		[Bullet point "Wapato Creek (steelhead; critical habitat for steelhead)"] See prior comment and consider adding Chinook salmon for Wapato Creek.	Vivian Erickson, WSDOT SR 167 Completion Project
62	4. Affected Environment and Environmental Consequences	4.9-20		[Regarding PTOI jurisdiction in the first paragraph] Some Hylebos RRP sites will be conveyed to the PTOI, including sites overlapping with TDLE footprint. See GCB-3437 Intergovernmental Agreement between WSDOT and the Puyallup Tribe of Indians: https://ftp.wsdot.wa.gov/contracts/9540-I-5toSR509NewExpressway/ConformedRFP/Appendices/I/I5/I5-GCB3437-IGA-btwn-WSDOT-PTOI.pdf	Vivian Erickson, WSDOT SR 167 Completion Project
63	4. Affected Environment and Environmental Consequences	4.9-20		[Environmental Impacts section] Add discussion on total avoidance of impacts or impacts proposed related to Hylebos RRP sites and how those would be approved.	Vivian Erickson, WSDOT SR 167 Completion Project

64	4. Affected Environment and Environmental Consequences	4.9-20		Update "Environmental Impacts" section and Ecosystems Technical Report to reflect habitat improvements that have occurred within WSDOT's Hylebos RRP. Affected environment of the RRP from the west side of I-5 to north of SR 99 have changed and are no longer characterized accurately.	Vivian Erickson, WSDOT SR 167 Completion Project
65	4. Affected Environment and Environmental Consequences	4.9-21		Ecosystems Technical Report does not reflect recent work to construct Hylebos RRP. Description of existing habitat conditions and functions should be updated in the Technical Report.	Vivian Erickson, WSDOT SR 167 Completion Project
66	4. Affected Environment and Environmental Consequences	4.9-48		[4.9.4 Potential Mitigation Measures section] If proceeding with alternative that is proposing impacts to Hylebos RRP Mitigation Site, include discussion on how impacts to the RRP would be mitigated and permitted/approved with consideration of performance requirements and deed restrictions that will be in place.	Vivian Erickson, WSDOT SR 167 Completion Project; Victoria Book - WSDOT Olympic Region Environmental
67	4. Affected Environment and Environmental Consequences	4.12-3	Figure 4.12-1	Confirm if USG Highway 99 should be shown as "impacted by all" alternatives and how that would be approved.	Vivian Erickson, WSDOT SR 167 Completion Project
68	4. Affected Environment and Environmental Consequences	4.12-7		[USG Highway 99 section] Please confirm if USG Site is located in South Federal Way Segment or Fife Segment. Please update based on WSDOT's most recent reports on clean-up activities.	Vivian Erickson, WSDOT SR 167 Completion Project
69	4. Affected Environment and Environmental Consequences	4.12-9		[USG Highway 99 site section] Add discussion about potential impacts to recent clean-up activities/cap on this site.	Vivian Erickson, WSDOT SR 167 Completion Project
70	DEIS	pg ii		FTA contact has Erin Littauer listed. Erin Littauer is no longer in this role so please update with the new contact information. (Same comment in Executive Summary Page ii)	Jessica Giblin, WSDOT Regional Transit Coordination Division
71	DEIS	pg ii		The community engagement contact listed here for the project is Artie Nelson. But when you Google The Tacoma Dome Link Extension webpage it lists Sagar Ramachandra as the lead contact. Should these match? (Same comment in Executive Summary page ii)	Jessica Giblin, WSDOT Regional Transit Coordination Division
72	DEIS	pg vi		"The FTA will then issue a ROD…". The FHWA will issue a ROD as well. (Same comment in Executive Summary pg ES-13 and pg ES-35)	Jessica Giblin, WSDOT Regional Transit Coordination Division
73	Executive Summary	cover pg		"*In July 2019, the Sound Transit Board identified the alternatives for study in the Draft EIS, including preferred alternatives for the majority of the Tacoma Dome Link Extension. In March 2023, the Sound Transit Board identified additional alternatives for stud*y." Should a sentence be added to summarize why there was a pause from 2019-2023? Example, here's what's used in the Executive Summary Pg ES-8: "*Through the progression of design and environmental review, Sound Transit identified the need to study additional alignment alternatives from near the South Federal Way Station through Milton to avoid known cultural resources adjacent to I-5.. .*"	Jessica Giblin, WSDOT Regional Transit Coordination Division
74	Executive Summary	Pg ES-1		"*Sound Transit and FTA completed environmental review for OMF South with publication of the Final NEPA/SEPA EIS in June 2024, and issuance of FTA's Record of Decision (ROD) in August 2024* ." FHWA issued a ROD as well, https://www.soundtransit.org/sites/default/files/documents/omf-south-record-of-decision-fhwa-202409.pdf	Jessica Giblin, WSDOT Regional Transit Coordination Division
75	Executive Summary	ES.3.2 Build Alternatives		"*Parking facilities with approximately 500 stalls each at the stations in South Federal Way and Fife, in either surface or garage park-and-ride configurations* ." Suggest adding clarifying language that the station locations are undecided. Example, 'at the chosen station locations'.	Jessica Giblin, WSDOT Regional Transit Coordination Division
76	Executive Summary		Figures ES-4 and ES-5	Should it be clarified that the Federal Way segment was already approved under the OMF S project? Section ES.3.2.1 describes this, but it doesn't seem reflected in the graphics. (comment throughout document, other chapters do this as well – explain that OMF S is a 'go' but the graphics make it seem like it's still up for debate.	Jessica Giblin, WSDOT Regional Transit Coordination Division

77	Executive Summary	Pg ES-35		WSDOT major regional transportation projects list. Please update as this link was last checked in 2020 and is now outdated. a. For example, the I-5 SR 161/SR 18 Triangle Project is shelved. https://wsdot.wa.gov/construction-planning/search-projects/i-5-sr-161-sr-18-triangle-interchange-vicinity-improvements b. here's the new STIP website: https://wsdot.wa.gov/business-wsdot/support-local-programs/delivering-your-project/statewide-transportation-improvement-program-stip	Jessica Giblin, WSDOT Regional Transit Coordination Division
78	Executive Summary	pg ES-37		Should permanent or temporary impacts to the WSDOT SR 167 Project's Riparian Restoration Program be added here? a. https://wsdot.wa.gov/construction-planning/search-projects/sr-167-completion-project b. https://wsdot.wa.gov/construction-planning/major-projects/puget-sound-gateway-program	Jessica Giblin, WSDOT Regional Transit Coordination Division
79	Executive Summary	pg ES-38		The Amtrak station is owned by WSDOT and was constructed with federal funds from the Federal Railroad Administration (FRA). The Tacoma segment's 'Close to Sounder' could result in demolition of this facility, which would be a permanent change.	Jessica Giblin, WSDOT Regional Transit Coordination Division
80	Executive Summary	pg ES-43		"*A project baseline budget is typically established at approximately 60% design (depending on the delivery method)…*". Should it be clarified that the delivery method is still unknown.	Jessica Giblin, WSDOT Regional Transit Coordination Division
81	Cumulative Impacts	pg 5-8		FWLE project is noted under parking (and then multiple times throughout this section). Should it be added that this is a Sound Transit project and to define FWLE the first time in this chapter?	Jessica Giblin, WSDOT Regional Transit Coordination Division
82	Cumulative Impacts	pg 5-8		The COFW CCA Project is discussed, but timing for that project is unclear as there is no construction funding. https://www.federalwaywa.gov/page/city-center-access-project	Jessica Giblin, WSDOT Regional Transit Coordination Division
83	Cumulative Impacts	pg 5-8		"*The SR 167 Completion Project is being constructed within the project vicinity in Fife and could displace some of the same properties as any of the build alternatives.*" This project should be done with construction by 2030, so the impacts should be known by now.	Jessica Giblin, WSDOT Regional Transit Coordination Division
84	Cumulative Impacts	pg 5-12		"*There are some reasonably foreseeable actions that have the potential to result in benefits rather than adverse effects on the environment. For example, WSDOT and WDFW are working cooperatively to inventory and assess fish passage barriers on WSDOT facilities statewide. This inventory is part of a court-mandated comprehensive state program to address culverts blocking fish passage. Culvert replacement and retrofitting projects through that program may improve fish access to streams over time within the study area. Sound Transit is coordinating its light rail facility design with WSDOT to avoid conflicts with future culvert replacement projects*." The project avoiding WSDOT's culverts is not a benefit on the environment. This discussion should be removed from this section.	Jessica Giblin, WSDOT Regional Transit Coordination Division
85	Alternatives considered	pg 2-9 and 2-13		(and other locations throughout document)– Should it be explained that OMF S was broken off from TDLE because the OMF S site must be up and running in advance of TDLE to support the expansion? The reasoning is not made clear.	Jessica Giblin, WSDOT Regional Transit Coordination Division
86	Affected Environment	pg 4.1-2		"*In accordance with 23 CFR 810 Part C, Making Highway Right-of-Way Available for Mass Transit Projects, Sound Transit must apply to WSDOT to use the right-of-way on I-5*." Should SR 99 be added to this?	Jessica Giblin, WSDOT Regional Transit Coordination Division
87	Affected Environment	pg 4.3-2		"SR 167 Completion Project, whish is planned to be completed by 2028". https://wsdot.wa.gov/construction-planning/search-projects/sr-167-completion-project it is now 2030.	Jessica Giblin, WSDOT Regional Transit Coordination Division
88	Affected Environment	pg 4.5-1 – 4.5		Visual and Aesthetic Resources - References WSDOT 2019 visual analysis guidelines. The WSDOT environmental manual was updated since then, https://wsdot.wa.gov/publications/manuals/fulltext/m31-11/459.pdf	Jessica Giblin, WSDOT Regional Transit Coordination Division
89	Affected Environment	pg 4.5-29		"*Sound Transit would prepare a roadside master plan…*" For other ST projects, WSDOT has received a Roadside Restoration Expectations Letter, a Tree Mitigation summary, and/or an RCA memorandum. What is triggering a roadside master plan instead of the other documents noted in this comment?	Jessica Giblin, WSDOT Regional Transit Coordination Division
80	Affected Environment	pg 4.8-14		The now expired ST/DOE MOU (2019) is referenced here. Point 8 of the MOU says, "This MOU will remain in effect until August 1, 2024". Ecology issued updated guidance in July 2024, where Ecology has identified Light Rail Guideways (both elevated and non-elevated) as PGIS. And as such, have been identified as a site type that requires metals treatment. This section should be updated to reflect this change. https://apps.ecology.wa.gov/publications/documents/2410013.pdf	Jessica Giblin, WSDOT Regional Transit Coordination Division

91	Affected Environment	pg 4.8-20		"*Stormwater runoff from normal light rail operation on guideway structures and trackway has a low risk of carrying additional pollutants to the aquifer because these surfaces are classified as non-pollution generating*." From Ecology's July 2024 stormwater manual for Western Washington: Light Rail Guideways as PGIS: The manual has been updated to identify Light Rail guideways (both elevated and non-elevated) as a pollution generating impervious surface. Light Rail guideways are also identified as a site type that requires metals treatment.	Jessica Giblin, WSDOT Regional Transit Coordination Division
92	Affected Environment	pg 4.9-31		"*Where they cross West Fork Hylebos Creek and Hylebos Creek (both of which are documented salmon-bearing streams), all South Federal Way Segment alternatives would permanently reduce forested habitat in the streams' riparian buffers. These impacts could affect the future riparian restoration areas along Hylebos Creek for the SR 167 Completion Project planned by WSDOT (see Chapter 5, Cumulative Impacts). Construction within 200 feet of Hylebos Creek would require permanent vegetation removal within the shoreline jurisdiction*." What will mitigation for these impacts look like?	Jessica Giblin, WSDOT Regional Transit Coordination Division

Sound Transit's Tacoma Dome Link Extension Project - DEIS Review, Appendices

WSDOT Comments. Contact Jessica Giblin - jessica.giblin@wsdot.wa.gov

#	Appendix	Page	Figure/Table	Comment	Reviewer
1	H5	2	Section 2.1.3	The revised WSDOT Hydraulic Manual was released in 2024. Please used most up to date manuals.	Kyungseop Shin, WSDOT NWR Hydraulics
2	Appendix J1	J1-256		Chapter 3-45 notes that sidewalk would be built along SR 99 in some alternatives, but 8.5 says that all TDLE build alternatives would not require any mitigation for nonmotorized access. Are these two statements conflicting or is the sidewalk installation identified elsewhere in this appendix?	Jennifer Nyerick, WSDOT NWR Traffic
3	D	D-10, D-37		Should be "Traditional Cultural Places" not "Properties." Also, it is more correct to say that Section 4(f) applies equally to historic sites, including historic built environment resources, archaeological resources, and TCPs, that are significant for preservation in place, not only for data potential (NRHP Criterion D).	Kelsey Matson, WSDOT HQ Historian
4	D	D-17		Provide date of SHPO/DAHP concurrence.	Kelsey Matson, WSDOT HQ Historian
5	D	D-17		Lack of street address for the Denny's.	Kelsey Matson, WSDOT HQ Historian
6	D	D-18		"*…period of significance dating from 1960*." Clarify: does this mean period of significance dates TO 1960, or that it begins in 1960 and continues to a later date?	Kelsey Matson, WSDOT HQ Historian
7	D	D-25		Mention Criteria Consideration D.	Kelsey Matson, WSDOT HQ Historian
8	D	D-28, 31-33 and throughout		Should be "listing in the NRHP" not "on the NRHP"	Kelsey Matson, WSDOT HQ Historian
9	D	D-35		Should be "one-part commercial block" not "party"	Kelsey Matson, WSDOT HQ Historian
10	D	D-37		Clarify: seems like the sentence ending with "unevaluated for listing under Criterion D" is missing a word.	Kelsey Matson, WSDOT HQ Historian
11	F		A00-KAP12 26, A00-KAP12 27, A00-KAP12 45, A00-KAP12 46	The track goes through the area of the currently closed southbound I-5 Federal Way weigh station. WSDOT will need to review and concur with this alignment and the proposed pier locations in the Compatibility Report.	Roger Baugh, WSDOT OLY Planning
12	F		A00-KAP12 57, A00-KAP12 58	The track location between Porter Way and the south intersection with 70th goes through an area the WSDOT SR 167 Project is using for mitigation. This requires coordination with this project team, regarding mitigation.	Roger Baugh, WSDOT OLY Planning
13	F		A00-KAP12 58, A00-KAP18 80	At both the north and the south intersections of SR 99 and 70th, pier locations may not be compatible with a future roundabout.	Roger Baugh, WSDOT OLY Planning
14	F		A00-KAP12 58	A pier is shown at 1939+80, between the Gateway mainline and the off-ramp from I-5 to the westbound Gateway. This location would significantly impact the Gateway ramp from southbound I-5 to the westbound Gateway, based on the Gateway roadway locations shown.	Roger Baugh, WSDOT OLY Planning
15	F		A00-KAP12 57, A00-KAP12 58, KA0-KAP09, KA0-KAP10, KB0-KAP09, KB0-KAP10	At the scale provided, it cannot be determined if pier placement along SR 99 has been adjusted to account for the minimum WSDOT SR 99 clearway request. Please clarify.	Roger Baugh, WSDOT OLY Planning
16	F		D00-KAP08 73	From 2079+00 to 2083+00, there does not appear to be adequate vertical clearance, based on the profile, over the I-5 southbound off-ramp to Port of Tacoma Road and 34th Street. Also, the vertical clearance should be shown in the profile, as these are roadway crossings.	Roger Baugh, WSDOT OLY Planning
17	F		A00-KAP18 80	The plan shows a pier at 2227+50. There is no pier on the profile.	Roger Baugh, WSDOT OLY Planning
18	J	J1-21		Section 4.3.2.4: Amtrak Cascades runs six daily roundtrips, not four.	Roger Baugh, WSDOT OLY Planning
19	J	J1-144		Section 5.3.2.5: the 26th Avenue Alternative notes, "*Localized impacts to the Amtrak and Sounder stations and Freighthouse Square could occu*r". Would these impacts also apply to the "Close to Sounder Alternative"?	Roger Baugh, WSDOT OLY Planning
20	J	J1-167, J1-169	5-31, 5-32	Intersection #25 (SR 99/Wapato Way) includes footnote 5 (Roundabout is proposed for the future condition. v/c ratio is reported). The footnote is unnecessary, as this intersection has already been reconstructed to a roundabout. Recommend removing "(70th Avenue E at SR 99)" from that line in the tables, as that is a separate intersection.	Roger Baugh, WSDOT OLY Planning

21	J	J1-178		In Section 5.4 the second bullet notes that there would be no impacts to truck circulation or routes with the exception of the Fife Median Alternative. As the SR 99 East Alternative would have the same impacts along SR 99 within its median-running section in Milton as the described impacts of the Fife Median Alternative along Pacific Highway, that option should also be noted as impacting truck circulation and access.	Roger Baugh, WSDOT OLY Planning
22	J	J1-218		Sections 5.6.6.2, 5.6.6.4, and 5.6.6.5: "*The Sounder tracks are at grade along East D Street*". The tracks are across D Street, not along.	Roger Baugh, WSDOT OLY Planning
23	J	J1-228		Section 6.1 refers to the WSDOT Design Manual with the year 2020. Please use the most recent version: https://www.wsdot.wa.gov/publications/manuals/fulltext/M22-01/design.pdf	Roger Baugh, WSDOT OLY Planning
24	J	J1-233		Section 6.2.2 - In addition to the closures and lane reductions noted, the SR 99 East Alternative could require construction and reconfiguration of the roadway, including lane shutdowns, similar to the Fife Median Alternative noted in Section 6.2.3.	Roger Baugh, WSDOT OLY Planning
25	J	J1-236		Section 6.3.5 discusses temporarily moving the train boarding area. The 350 feet noted is approximately the distance from the current Amtrak and Sounder stations to D Street and is realistic for the temporary station shift under the Close to Sounder alternative. The boarding area may not shift by the same distance, depending on where the trains would actually stop during construction and if they would be allowed to block D Street during boarding.	Roger Baugh, WSDOT OLY Planning
26	J	J1-248		Section 6.9.1: Revise "*construction of the pier*" to "construction of the piers", as there are two I-5 piers in the Puyallup River to align with, not one.	Roger Baugh, WSDOT OLY Planning
27	J	J1-253 thru J1-256		Section 8.3 notes intersections which would require mitigation. For WSDOT intersections, change in intersection configuration or control would require an Intersection Control Evaluation (ICE) be completed. It is possible that the ICE process may result in mitigation which does not match the DEIS proposal.	Roger Baugh, WSDOT OLY Planning
28	H2	H2-2		The first sentence under "Project Consistency" notes the cities of Federal Way, Milton, and Tacoma have comprehensive plans and would have stations. Should Fife be added here?	Roger Baugh, WSDOT OLY Planning
29	H2	H2-16	H2-4	This table, which applies to Federal Way, includes "*TDLE would cross several streams and rivers, including Hylebos Creek and the Puyallup River*." Neither Hylebos Creek or the Puyallup River are within Federal Way.	Roger Baugh, WSDOT OLY Planning
30	H3	H3-2		In the second line of the fourth paragraph, insert "growth" before "rate".	Roger Baugh, WSDOT OLY Planning
31	H3	H3-8		In the eighth line of the first paragraph, revise "Plans, most" to either "Plans; most" or "Plans, and most".	Roger Baugh, WSDOT OLY Planning
32	J5	J5-66		45PI1631 was actually found in August 2023 and was determined eligible. Site form updates on WISAARD are pending final analysis of artifacts and sediments recovered during data recovery, but WSDOT can provide information such as the preliminary radiocarbon date through a personal communication citation given the report will not be finished in time for this document. This could likely affect the analysis in Section 10.1 and Table 10-1 as well.	Cassandra Manetas, WSDOT SR 167 Completion Project
33	J5	J5-66	Table 7-1 to 7-4	As we are reviewing a redacted version of the document we can't be sure, but in an earlier unredacted draft many existing sites were noted as simply "historic debris scatter". Have the ages/locations of the sites been considered in terms of historic materials potentially dating to tribal allotments? We have found historic period allotment sites that have been determined eligible in consultation with PTOI immediately north of the Fife segment of the APE (45PI1604). Given redaction, not sure if there is language specifying if previously recorded historic scatters are of an age with allotments or not, (though later tables noting the age of sites identified during testing efforts for this report are clear about potential allotment ages)	Cassandra Manetas, WSDOT SR 167 Completion Project

34	Appendix J1 Transportation Technical Report Attachment A, Transportation Methods Report.	A-20	A-5	Measures for Arterials and Local Street include Intersection LOS. Only found SimTraffic reports, did not find Synchro Reports for LOS. Please tell us where to find the Synchro files for the study intersections.	Manuel Abarca, WSDOT OLY Traffic
35	Appendix J1 Transportation Technical Report Attachment A	J1-7		3. Relevant Plans, Policies, and Coordination section does not refer to the WSDOT policy documents for Traffic Analysis. For any work impacting WSDOT facilities, the policy documents guide how traffic analysis should be conducted when using Traffic Analysis software such as Synchro. SIDRA and Vissim.	Manuel Abarca, WSDOT OLY Traffic
36	Appendix J1	J1-48	Table 4-24	We cannot verify the results presented in the tables reporting traffic operations until we can review the printed output and the electronic files.	Manuel Abarca, WSDOT OLY Traffic
37	10a - Appendix I - Alternatives Development	79 and 303 (17 of the Scoping Summary Report)		Note that, while WSDOT may not have right-of-way impacts for the Tacoma Dome Station area, WSDOT does own the Amtrak Tacoma Dome Station and has easement rights on the shared Amtrak/Sounder platform and WSDOT will have an opinion on the location of the Tacoma Dome Station area station location moving forward.	Lora Foster, WSDOT Rail, Freight, & Ports
38	Appendix H-7 Hazardous Materials		Fig. H7-9B	This figure shows site 754 "Freighthouse Square Amtrak Relocation" at the east end of Freighthouse Square. The Executive Summary indicates that the temporary Amtrak station would be at the west end. Please clarify the proposed location for the temporary Amtrak station.	Paul Krueger, WSDOT Rail, Freight, & Ports
39	07a. Appendix F - Conceptual Design Drawings	A00-KAP1157		[See attached marked up figure] Would this alignment include improvements along the SR 99 frontage to build out per Milton Standards? Would this impact existing stormwater in SR 99?	Aaron Fieser, WSDOT SR 167 Completion Project
40	07a. Appendix F - Conceptual Design Drawings	A00-KAP1157		[See attached marked up figure] The alignment here and proposed stormwater facility extend into the Middle Hylebos RRP site.	George Ritchotte, WSDOT SR 167 Completion Project
41	07a. Appendix F - Conceptual Design Drawings	A00-KAP1157		[See attached marked up figure] Would this facility footprint and associated excavation depth be in conflict with remediated soil conditions at conclusion of USG site cleanup actions?	Mark Ewbank, WSDOT SR 167 Completion Project
42	07a. Appendix F - Conceptual Design Drawings	A00-KAP1157		[See attached marked up figure] Show more recent aerial photo and show the Hylebos RRP Mitigation Site boundary and new Hylebos Creek alignment on plans. The RRP has performance standards that need to be met by WSDOT and will have site protection mechanisms recorded per permit requirements. How will impacts to RRP be avoided? Or how will proposed impacts to RRP be coordinated for approval through agencies, PTOI, and WSDOT?	George Ritchotte & Vivian Erickson, WSDOT SR 167 Completion Project
43	07a. Appendix F - Conceptual Design Drawings	A00-KAP1157		[See attached marked up figure] Existing grade has changed as RRP in this area was graded and USG site was remediated in summer 2024. Survey data and basis of design stream and wetland layer will require updates to reflect new existing conditions. Grading at USG site will also require an update.	Vivian Erickson, WSDOT SR 167 Completion Project
44	07a. Appendix F - Conceptual Design Drawings	A11-KAP1258		[See attached marked up figure] This portion of the alignment crosses Lower Hylebos South Hylebos RRP site and the shown support column may be in conflict with realigned Hylebos Creek. If the alignment doesn't change, it should clear span the mitigation site and minimize wetland, buffer, and floodplain impacts. What is the height of the structure in this location? Will shading impacts be an issue?	George Ritchotte, Mark Ewbank, & Aaron Fieser, WSDOT SR 167 Completion Project
45	07a. Appendix F - Conceptual Design Drawings	A11-KAP1258		[See attached marked up figure] Existing grade has changed as RRP in this area was graded in summer 2024. Survey data and basis of design stream and wetland layer will require updates to reflect new existing conditions.	Vivian Erickson, WSDOT SR 167 Completion Project

46	07a. Appendix F - Conceptual Design Drawings	A11-KAP1258		[See attached marked up figure] Show more recent aerial photo and show the Hylebos RRP Mitigation Site boundary on plans. The RRP has performance standards that need to be met by WSDOT and will have site protection mechanisms recorded per permit requirements. How will impacts to the Hylebos RRP be avoided? Or how will proposed impacts to the Hylebos RRP be coordinated for approval through agencies, PTOI, and WSDOT?	Vivian Erickson, WSDOT SR 167 Completion Project
47	07a. Appendix F - Conceptual Design Drawings	A11-KAP1258		[See attached marked up figure] Column appears to be in conflict with SB I-5 to SB SR 167 Ramp.	Adam Lee, WSDOT SR 167 Completion Project
48	07a. Appendix F - Conceptual Design Drawings	A11-KAP1258		[See attached marked up figure] Column may be in conflict with maintenance pullout/drainage/signal & sign infrastructure.	Adam Lee, WSDOT SR 167 Completion Project
49	07a. Appendix F - Conceptual Design Drawings	A11-KAP1258		[See attached marked up figure] Column may be in conflict with shared use path.	Adam Lee, WSDOT SR 167 Completion Project
50	07a. Appendix F - Conceptual Design Drawings	A11-KAP1258		[See attached marked up figure] WSDOT widens, adds 10-ft sidewalks, and vegetated landscape buffers along both sides of SR 99 from ~70th to Wapato Way. These improvements should be reflected and considered.	Aaron Fieser, WSDOT SR 167 Completion Project
51	07a. Appendix F - Conceptual Design Drawings	A11-KAP1258		[See attached marked up figure] WSDOT will be replanting this corridor as part of SR 167 Stage 1b Project. Will plants need to be redone by Sound Transit if within their overhead guideway zone?	Aaron Fieser, WSDOT SR 167 Completion Project
52	07b. Appendix F - Conceptual Design Drawings	A3B-KAP1668		[See attached marked up figure] This is in the area of a City of Fife portion of the Fife to Tacoma Pedestrian Access project that will construct a segment of the spuyaləpabš Trail. (Pacific Hwy E from Port of Tacoma Rd to Alexander Ave) Work should be coordinated to eliminate re-work.	Adam Lee, WSDOT SR 167 Completion Project
53	08. Appendix G - Present and Reasonably Foreseeable Actions	G-3	Figure G-2	Add Federal Way 373rd/SR 99 roundabout project. See following site for more information: https://www.federalwaywa.gov/page/s-373rd-and-pacific-hwy-s-roundabout	Aaron Fieser, WSDOT SR 167 Completion Project
54	08. Appendix G - Present and Reasonably Foreseeable Actions	G-4	Figure G-3	Consider adding the rebuilt intersection at SR 509/Alexander Avenue East as part of SR 167 Stage 1b Project	Aaron Fieser, WSDOT SR 167 Completion Project
55	08. Appendix G - Present and Reasonably Foreseeable Actions	G-4	Figure G-3	[Regarding Project Location 51] This segment would be done by Fife (not WSDOT).	Aaron Fieser, WSDOT SR 167 Completion Project
56	08. Appendix G - Present and Reasonably Foreseeable Actions	G-5	Figure G-4	[Regarding Pacific Hwy E Bridge over Puyallup River] Consider adding Pacific Highway East bridge replacement/repair (currently closed).	Aaron Fieser, WSDOT SR 167 Completion Project
57	08. Appendix G - Present and Reasonably Foreseeable Actions	G-5	Figure G-4	Add Puyallup Ave Corridor Improvements which will include a segment of the spuyaləpabš Trail (Tacoma Project).	Aaron Fieser, WSDOT SR 167 Completion Project
58	08. Appendix G - Present and Reasonably Foreseeable Actions	G-8	Table G-1	[Under 24 SR 167 Frontage Road section] Regarding language about "future SR 167 extension" - This isn't "future" for much longer, and name of WSDOT project should be changed to SR 167 Completion Project.	Mark Ewbank, WSDOT SR 167 Completion Project

59	08. Appendix G - Present and Reasonably Foreseeable Actions	G-8	Table G-1	[Under 25 WSDOT SR 167 Completion Project section] Add number "2" prior to "b" to read "2b".	Mark Ewbank, WSDOT SR 167 Completion Project
60	08. Appendix G - Present and Reasonably Foreseeable Actions	G-8	Table G-1	[Under 26 70th Avenue E and I-5 Bridge Replacement section] Delete "Extension" and replace with "Completion" to read "SR 167 Completion Project". Delete "will have" and replace with "has" to read "New bridge has 4 lanes…"	Mark Ewbank, WSDOT SR 167 Completion Project
61	08. Appendix G - Present and Reasonably Foreseeable Actions	G-8	Table G-1	[Under 25 WSDOT SR 167 Completion Project section] Update "2020-2029" to "2020-2030". SR 167 Stage 2b is planned to open to traffic in summer 2029 before substantial completion. Substantial completion is planned in late Sept 2029 with Physical Completion within 6 months and Completion within 3 months of Physical Completion.	Te Ma, WSDOT SR 167 Completion Project
62	08. Appendix G - Present and Reasonably Foreseeable Actions	G-9	Table G-1	[Under 27 SR 167 Relocation of Interurban Trail and Trailhead section] Delete "to be" to read "Improvements built concurrent…"	Mark Ewbank, WSDOT SR 167 Completion Project
63	08. Appendix G - Present and Reasonably Foreseeable Actions	G-9	Table G-1	[Regarding 28 20th Street E from 70th Avenue E to Freeman Road section] This is part of the WSDOT Stage 2b Project.	Aaron Fieser, WSDOT SR 167 Completion Project
64	08. Appendix G - Present and Reasonably Foreseeable Actions	G-10	Table G-1	[Under 39 I-5/54th Avenue E Interchange Improvements section] For the construction duration or status column "Completed in 2020": This is a phased project, and it is not completed or fully funded.	Te Ma, WSDOT SR 167 Completion Project
65	08. Appendix G - Present and Reasonably Foreseeable Actions	G-10	Table G-1	[Under 48 Canyon Road Connection Project section] For the construction duration or status column - Please confirm - instead of completed in 2027, it appears to be scheduled to start from 2027.	Te Ma, WSDOT SR 167 Completion Project
66	08. Appendix G - Present and Reasonably Foreseeable Actions	G-11	Table G-1	[Under 51 spuyaləpabš Trail section] If this is WSDOT jurisdiction, state limits between Riverwalk Trail in Puyallup and SR 509 at Alexander and at Taylor Way. Recommend adding the separate Fife and Tacoma segments that each City will self-perform.	Aaron Fieser, WSDOT SR 167 Completion Project
67	08. Appendix G - Present and Reasonably Foreseeable Actions	G-14		[Regarding City of Fife. 2020. Resolution No. 1940 citation] Update with their most recent plan.	Aaron Fieser, WSDOT SR 167 Completion Project
68	11. Appendix J1 - Transportation Technical Report	J1-12		[Under SR 167 section] The SR 167 Completion Project is scheduled to be open to traffic before TDLE. At a minimum, add description for SR 167 Stage 1b that will be open to traffic in 2026. Existing SR 167 along River Rd will be renamed to "167 ALT" as part of the SR 167 2b Project when the new alignment opens to traffic (scheduled for summer 2029).	Aaron Fieser, WSDOT SR 167 Completion Project
69	11. Appendix J1 - Transportation Technical Report	J1-16	Figure 4-1	Show the SR 167 Completion Project alignment on the figure.	Aaron Fieser, WSDOT SR 167 Completion Project
70	11. Appendix J1 - Transportation Technical Report	J1-32	Table 4-19	[Regarding Fife Segment 7 row] As part of the spuyaləpabš Trail improvements, a pedestrian hybrid beacon (PHB) signal is proposed at this intersection.	Aaron Fieser, WSDOT SR 167 Completion Project

71	11. Appendix J1 - Transportation Technical Report	J1-32	Table 4-19	[Regarding Fife Segment 5 row] Does this include the improvements to be constructed by WSDOT as part of the SR 167 Stage 1b Project?	Aaron Fieser, WSDOT SR 167 Completion Project
72	11. Appendix J1 - Transportation Technical Report	J1-32	Table 4-19	[Regarding Fife Segment 25 row] These are two different intersections and should be analyzed separately.	Aaron Fieser, WSDOT SR 167 Completion Project
73	11. Appendix J1 - Transportation Technical Report	J1-35	Figure 4-8	Include study area intersection of 70th Ave E and SR 99 on the figure. WSDOT rebuilds this signal as part of SR 167 Stage 1b Project.	Aaron Fieser, WSDOT SR 167 Completion Project
74	11. Appendix J1 - Transportation Technical Report	J1-48	Table 4-24	[Row 25] What is the justification for not including this in the model?	Aaron Fieser, WSDOT SR 167 Completion Project
75	11. Appendix J1 - Transportation Technical Report	J1-61	Figure 4-21	Are the planned SR 167 pedestrian improvements included? If not, why?	Aaron Fieser, WSDOT SR 167 Completion Project
76	11. Appendix J1 - Transportation Technical Report	J1-61	Figure 4-21	Are the planned spuyaləpabš Trail improvements included? If not, why?	Aaron Fieser, WSDOT SR 167 Completion Project
77	11. Appendix J1 - Transportation Technical Report	J1-136	Figure 5-10	[Regarding area near "8%" symbology and Taylor Way E] Increase in volume is identified in this area; however, level of service (LOS) analysis of New 54th interchange does not show increase in delay.	Karl Westby, WSDOT SR 167 Completion Project
78	11. Appendix J1 - Transportation Technical Report	J1-165	Table 5-31	Footnote 8 indicates inability to properly capture delay. As such, results may be underreporting impacts. Suggest using alternate tool to capture delay.	Karl Westby, WSDOT SR 167 Completion Project
79	11. Appendix J1 - Transportation Technical Report	J1-165	Table 5-31	[Regarding 5 Alexander Avenue E at SR 509 Westbound row] This intersection will be modified as part of the WSDOT Gateway Program. Need to confirm that modification is included in the future no build and build analyses.	Karl Westby, WSDOT SR 167 Completion Project
80	11. Appendix J1 - Transportation Technical Report	J1-166	Table 5-31	[Regarding both rows 14 and 15] Both I-5 ramp intersections will be impacted. Mitigation of the impacts need to be identified. Without mitigation, traffic may divert and impact other WSDOT interchanges.	Karl Westby, WSDOT SR 167 Completion Project
81	11. Appendix J1 - Transportation Technical Report	J1-168	Table 5-32	Please see similar comments to those included in the AM peak hour table and apply to the PM peak hour table.	Karl Westby, WSDOT SR 167 Completion Project
82	11. Appendix J1 - Transportation Technical Report	J1-240		Please add bullet(s) for mitigation reflecting coordination with other projects during the construction, specifically WSDOT Gateway Program.	Te Ma, WSDOT SR 167 Completion Project
83	11. Appendix J1 - Transportation Technical Report	J1-259		[Regarding projects listed in the first paragraph of 9.1 Regional Facilities and Travel section] Please confirm - these are not part of the WSDOT Gateway Program.	Te Ma, WSDOT SR 167 Completion Project
84	11. Appendix J1 - Transportation Technical Report	J1-259		[Regarding paragraph 3 of 9.1 Regional Facilities and Travel section] The Triangle Project is not officially part of the WSDOT Gateway Program.	Te Ma, WSDOT SR 167 Completion Project

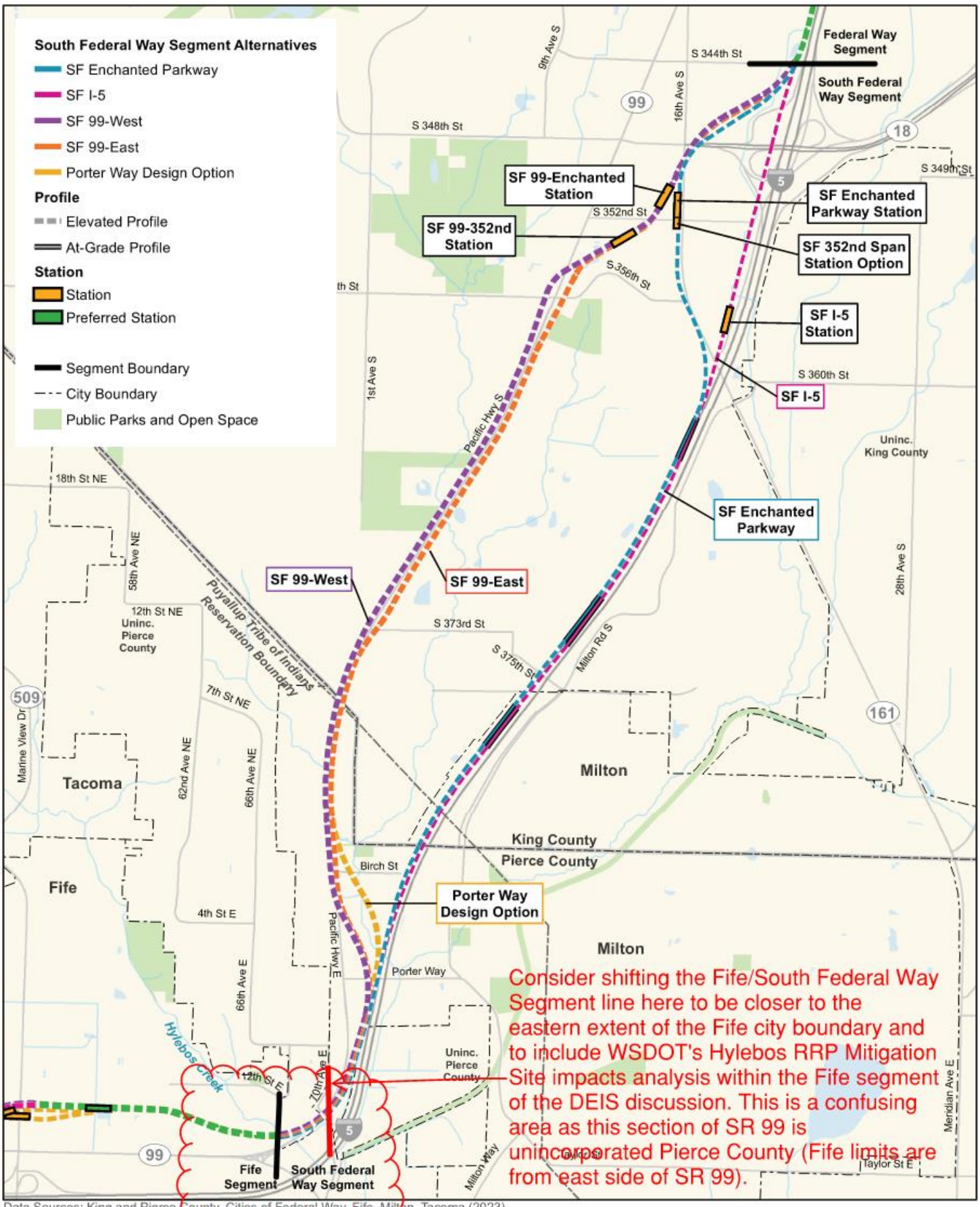
85	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-4		[Regarding the last bullet under 1.2.5 Other studies and environmental reviews section] Add the SR 167 Stage 1b and Stage 2 Mitigation Plans and Stage 1b CLOMR.	Aaron Fieser, WSDOT SR 167 Completion Project
86	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-4		[Regarding the last bullet under 1.2.5 Other studies and environmental reviews section] Add SR 167 Stage 2a and Stage 2b Projects.	Aaron Fieser, WSDOT SR 167 Completion Project
87	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-10	Figure J4.1-4	Does Surprise Lake Tributary fall within the study area? If so, add it to Section 1.5.4.1.	Aaron Fieser, WSDOT SR 167 Completion Project
88	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-12		[Regarding Fife Segment paragraph] Include information about SR 167 Stage 1b RRP.	Aaron Fieser, WSDOT SR 167 Completion Project
89	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-14		[Under 1.5.3 Wetlands section] Include information about SR 167 Stage 1b RRP.	Aaron Fieser, WSDOT SR 167 Completion Project
90	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-15		[Regarding Fife Ditch bullet] WSDOT received determination of this being non-fish bearing.	Aaron Fieser, WSDOT SR 167 Completion Project
91	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-15		[Regarding "Wapato Creek" bullet] See prior comment and consider adding Chinook salmon for Wapato Creek.	Aaron Fieser, WSDOT SR 167 Completion Project
92	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-40	Figure J4.3-7	Update figure to show WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project
93	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-41	Figure J4.3-8	Update figure to show WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project
94	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-42	Figure J4.3-9	Update figure to show WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project
95	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-43	Figure J4.3-10	Show the Port wetland mitigation work that was in addition to the shown stream realignment.	Aaron Fieser, WSDOT SR 167 Completion Project
96	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-66		[Under 3.1.2.12 Hylebos Creek section] Update to discuss WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project

97	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-68		[Under 3.1.2.13 Surprise Lake Creek section] Update to discuss WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project
98	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-71		[Under second paragraph of section 3.1.2.16 Wapato Creek] Add WSDOT planned work and removal of culvert under SR 509/Tacoma Rail.	Aaron Fieser, WSDOT SR 167 Completion Project
99	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-72	Table J4.3-8	This is outside of the study area based on Figure J4.1-4	Aaron Fieser, WSDOT SR 167 Completion Project
100	14a. Appendix J4 - Ecosystem Resources Technical Report	J4-72	Table J4.3-8	Add discussion of WSDOT work to remove this in SR 167 Stage 2b.	Aaron Fieser, WSDOT SR 167 Completion Project
101	14b. Appendix J4 - Ecosystem Resources Technical Report	J4-118		[Under 3.3.3 Fife Segment section] Update to discuss WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project
102	14c. Appendix J4 - Ecosystem Resources Technical Report	J4-190		[Under 4.1.1.4 Fife Segment Alternatives section] Update to discuss WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project
103	14c. Appendix J4 - Ecosystem Resources Technical Report	J4-196		[Under 4.1.2.4 Fife Segment Alternatives section] Update to discuss WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project
104	14d. Appendix J4 - Ecosystem Resources Technical Report	J4-250		[Paragraph 2] Please verify. The WSDOT Hylebos RRP will improve habitat and construct wildlife crossings included throughout the RRP and across I-5 and SR 99.	Aaron Fieser, WSDOT SR 167 Completion Project
105	14e. Appendix J4 - Ecosystem Resources Technical Report	J4-255		[Under 4.3 Wetlands section] Update to discuss WSDOT stream and mitigation work that will be complete prior to TDLE.	Aaron Fieser, WSDOT SR 167 Completion Project
106	Apdx J2	General Statement		Review FHWA guidelines on impacts and how to talk about them (page A-2). 2015 guidelines talk about compatibility of the impact, sensitivity, and value. All of these aspects should be discussed in this document. Compatibility of the impacts is often missing from the discussion. There is concern that this document is not addressing the impact value as adverse in many cases where users/viewers are sensitive and the compatibility of the alignment is significantly different from surrounding landuse. Visual impact values should be addressed as beneficial, neutral, or adverse. Mitigation measures should follow that line of communication, in that, more adverse impacts (especially for the preferred alternative) should have more mitigation conversation in this document.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
107	Apdx J2	J2-3 Page 8		The summary does not make sense, in that, viewer sensitivity is high and impacts are significant "high visual change", yet the analysis of the change is "moderate". More discussion on adverse impacts for sensitive viewers should occur in this summary and more alignment with the description.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture

108	Apdx J2	J2-4 Page 9		Address the compatibility of the impact. The scale of the facility is addressed in the I-5 portion of the writing "similar in scale with structures on I-5" but not in the Enchanted parkway Portion of the summary. The scale is the biggest adverse visual impact on those alternatives and should be addressed in the summary.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
109	Apdx J2	J2-5 Page 10		Address the compatibility of the impact. The entrance to the school and visual buffer is changed from vegetation to structure. This is an adverse affect for the school in the SR 99 west alignment. Saying that the visual change is moderate does not align with scale of the project impact. The scale of the project impact is not measured against the scale of the surrounding environment.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
110	Apdx J2	J2-6 Page 11		Address the compatibility of the impact. The overall visual change is low to moderate (overall) but the scale of the impacts are not really addressed between alternatives. The overall visual change is not comparable between 99 and I-5. The large project scale is less compatible with the scale of roadway and land uses along 99 from a visual standpoint. There is a more adverse affect along 99.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
111	Apdx J2	J2-17 Page 22		[Observations Pt Analysis] If mitigation is included in the simulation, the mitigation measures that are shown should be discussed so that the reader/viewer knows what measures have been applied. The value of the impact and change should not be based on mitigation measures that cannot be guaranteed. This is missing throughout the discussions.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
112	Apdx J2	J2-20 Page 25	Figure J2-5	This is an example of talking about the alignment using mitigation measures that are shown in the graphic simulation but not necessarily proposed as part of the project. Much of the vegetation adjacent to I-5 will be removed and some of it may be replaced, but that would be considered a mitigation measure and would not look like this graphic. At a minimum, this should be discussed and reflected in the ratings.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
113	Apdx J2	J2-20 Page 25	Figure J2-5	The ratings scale that you have used for this simulation is based on the graphic with mitigation measures shown. Adjust this to be in line with the actual impact. Vegetation will be removed adjacent to I-5/under the line and closer to the homes. Mitigation measures will restore some of this but most likely not to the height shown here due to setbacks and constraints. The view would be adversely impacted because of that.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
114	Apdx J2	J2-20 General, Unit 1		Add simulation from I-5 driver perspective for this unit. The change will be significant for more sensitive driver/viewers as you have pointed out in your initial summary.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
115	Apdx J2	J2-24	Figure J2-8	Please show pedestrians for scale. This is another example of mitigation (vegetation shown) used to soften the visual graphic that may or may not occur, especially that close to the track. There are no businesses or signs beyond the new track shown, only a greenbelt buffer. This might occur, but these are not commitments that have been mentioned in this document so it's inconsistent.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
116	Apdx J2	J2-24	Figure J2-8	Ratings for this graphic are specifically using the mitigation measures shown. Unity will not improve without the mitigation measures. The scale of facility and sensitivity of pedestrians and regular patrons would likely outweigh any mitigation of visual effects anyway. This can be a conversation in this paragraph but the rating should be based on actual visual representation of the proposed project.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
117	Apdx J2	2.2.2	Figure J2-8	Unity is shown to improve with the addition of an overhead guideway at the intersection of S 348th and Enchanted Parkway. Either build alternative will add visual complexity to the intersection. Disagree with the statement that the new guideway structure would improve unity with long curving lines visible into the distance. The structure will add a potential distraction and visual clutter against the traffic lights.	Ryan Leigh, WSDOT NWR Landscape Architecture
118	Apdx J2	2.2.3	Figure J2-9	The Enchanted Parkway Alternative would significantly impact the unity and visual quality. The size and scale of the elevated guideway dominates the view and turns what could be considered a fairly open view into a very linear view with the guideway on one side and overhead power on the other. This has more of an impact than is being described.	Ryan Leigh, WSDOT NWR Landscape Architecture

119	Apdx J2	J2-29	Figure J2-10	Address the compatibility of the impact. Please describe the scale difference from a visual perspective of a driver and pedestrian and how the 2 Enchanted Pkwy station alternatives affect those viewers. They are significantly different from that perspective in this viewpoint.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
120	Apdx J2	J2-29	Figure J2-10	The description states no visual impact but the J2-10 simulation shows an existing condition with views to the forested hills in the background. These views are eliminated with the elevated structure. Long view corridors are replaced with a foreground focus. This change is a visual impact and should be mentioned.	Ryan Leigh, WSDOT NWR Landscape Architecture
121	Apdx J2	J2-36 page 41	Figure J2-12	Add a pedestrian to this graphic. Also describe scale in the summary. Is the scale of this project impact matching the scale of other development in the area?	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
122	Apdx J2		Figure J2-16	Is there enough space to accommodate the mitigation shown in this graphic. The planting on the west side looks to be mitigation for the visual impacts but it doesn't look like there is space for large planting. The trees in the background would be removed. A discussion here would help the viewer understand what might be possible but right now the description is inconsistent with the graphic.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
123	Apdx J2	2.2.12		The description of the impacts to the cemetery don't make sense compared with the graphic representation. The graphic shows both alignments on the west side of 99 but one is closer than the other. This description talks about an alignment on the eastside of 99.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
124	Apdx J2	J2-45	Figure J2-18	Is the eastern alignment of 99 in the middle of 99 or is this in the wrong location? It doesn't match the description.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
125	Apdx J2	2.2.14	Figure J2-20	Observation point 17 needs more explanation. The build alternative would be a significant change in the view along this corridor but the only item mentioned is views of vegetation being blocked. The elevated structure adjacent to I-5 will have more impacts than just blocking the view of vegetation.	Ryan Leigh, WSDOT NWR Landscape Architecture
126	Apdx J2	J2-50	Figure J2-22	Address compatibility of the impact. What would retain the view with a moderate vividness? The tracks bisect the view in the foreground essentially removing the vividness of the natural views of Mt. Rainier and surrounding vegetation.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
127	Apdx J2	2.2.16	Figure J2-22	Recommend re-evaluating the visual quality rating for this. The view from residences is of a natural looking valley. Adding an elevated guideway in the immediate foreground eliminates the view of the valley and hills in the distance. All rating categories would be reduced significantly, especially visual quality which could be considered very low.	Ryan Leigh, WSDOT NWR Landscape Architecture
128	Apdx J2	J2-52		The description of impacts does not match the value rating given. Compatibility of impact should be addressed.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
129	Apdx J2	J2-60	Figure J2-28 (median alternatives)	Address compatibility of the impact. Is the structure aligned with surrounding development? The ratings don't really tell the whole story for the design alternatives. It's clear that the median structure is more prominent in scale and the facility is less aligned with the existing visual quality. This needs to be a discussion here and the ratings need to reflect the difference.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
130	Apdx J2	2.3.5	Figure J2-28	Explain how the addition of significant elevated structure would not be a visual impact at this location.	Ryan Leigh, WSDOT NWR Landscape Architecture
131	Apdx. J2	J2-64	Figure J2-30 (median alternatives for the entire Landscape Unit 5)	Address compatibility of the impact. Is the structure aligned with surrounding development? The ratings don't really tell the whole story for the design alternatives. It's clear that the median structure, compared with the highway alternative, is more prominent in scale and the facility is less aligned with the existing visual quality. This needs to be a discussion here and the ratings need to reflect the difference.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
132	Apdx. J2	2.3.7, 8	Figure J2-30,31	The elevated guideway along Pacific Highway will have significant visual impacts compared to existing but the existing and build alternative ratings remain the same. Recommend re-evaluating.	Ryan Leigh, WSDOT NWR Landscape Architecture
133	Apdx. J2	2.4.8	Figure J2-43	Consider re-evaluating. The west alternative and the sounder alternative both have elevated guideways and columns that create a significant visual quality impact. The ratings are lower than the existing conditions but it seems like the true impacts are being minimized in the rating.	Ryan Leigh, WSDOT NWR Landscape Architecture

144	Apdx. J2	J2-90 and J2-91	Figure J2-44	What is viewer sensitivity here? This is a signification change to the view but there is no discussion about whether viewers will care.	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
134	Apdx. J2	2.4.11	Figure J2-46	The visual impacts for this area are greater than what is reflected in the rating. The elevated guideway and related structures dominate the view and make it almost impossible to see what is beyond.	Ryan Leigh, WSDOT NWR Landscape Architecture
135	Apdx J2	J2 93-95	Figure J2-46 and Figure J2-47	Are viewers sensitive here? Both of these viewpoints are significantly impacted but it's unclear by the description if viewers are sensitive or not. The compatibility of the impacts are also not discussed here. Depending on the discussion is the impact adverse?	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
136	Apdx J2	J2-93	J2-46	Is the station design set? Is there a way to mitigate visual impacts here?	Lindsey Jungbluth, WSDOT NWR Landscape Architecture
137	Ecosystems Technical Report (Appendix J4)		Tables J4.3-6, J4.3-7, J4.3-8, J4.3-9, J4.3-10, J4.3-11 etc.	a. These tables are titled '*fish passage barrier assessment*' but most tables list barrier status as 'unknown'. Please clarify if these are barriers. Do they need to be assessed if 'unknown'? If not, consider renaming the tables to something other than 'fish passage barrier'. b. These list ownership as 'public'. Please list which public agency owns– example, 'city' or 'state'. c. Also consider adding 'fish use' to the table (yes or no). Table J4.3-7 lists non-fish bearing under 'barrier status' column. Consider changing the name of this column to 'fish use' instead of barrier status if that is what is should be utilized for. d. Will there be impacts to these streams? Will any barriers be corrected? This is unclear.	Jessica Giblin, WSDOT Regional Transit Coordination Division
138	Ecosystems Technical Report (Appendix J4)		J4.3-8	Legend shows triangle symbol for 'barrier on a NFB stream' but it is not shown on this map.	Jessica Giblin, WSDOT Regional Transit Coordination Division
139	Ecosystems Technical Report (Appendix J4)		J4.3-4	Legend shows orange circle for 'partial blockage' but it is not shown on this map.	Jessica Giblin, WSDOT Regional Transit Coordination Division
140	Ecosystems Technical Report (Appendix J4)		J4.3-3	Legend shows black circle for 'unknown' but it is not shown on this map.	Jessica Giblin, WSDOT Regional Transit Coordination Division

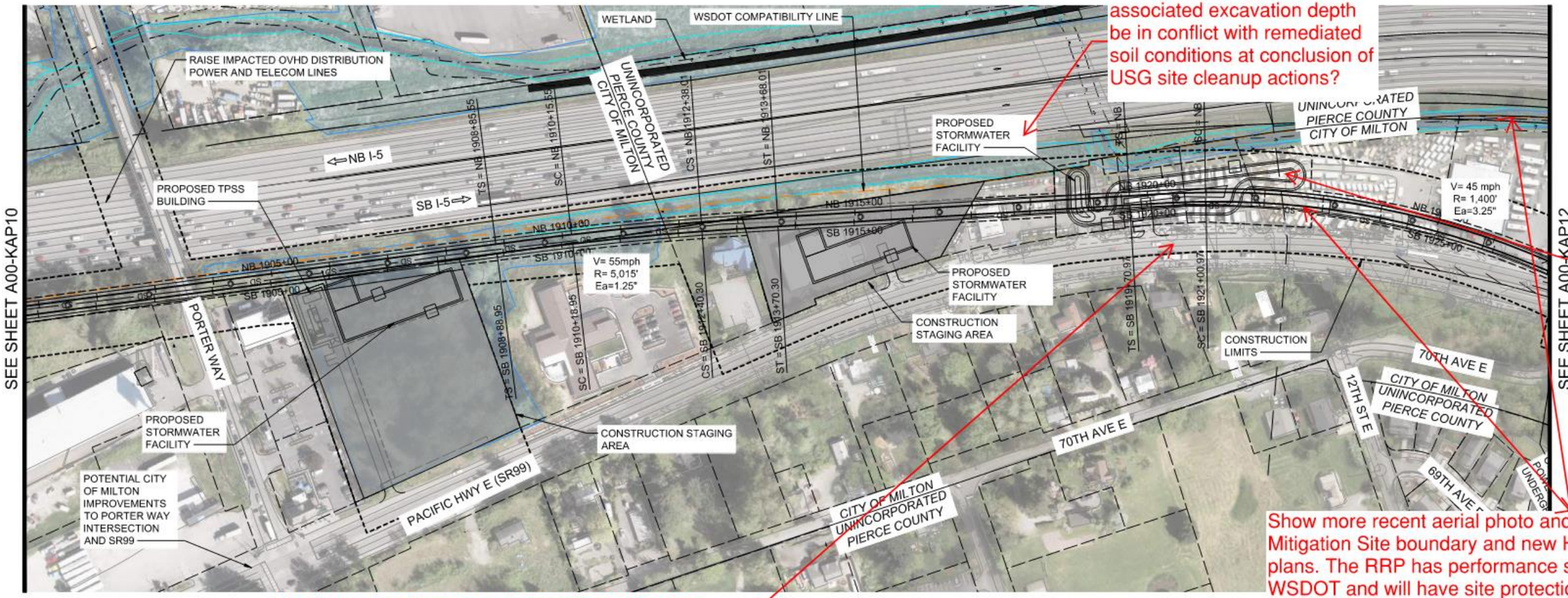


Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2023).

FIGURE ES-6
South Federal Way Segment Alternatives

Tacoma Dome Link Extension

SOUND TRANSIT TACOMA DOME LINK EXTENSION

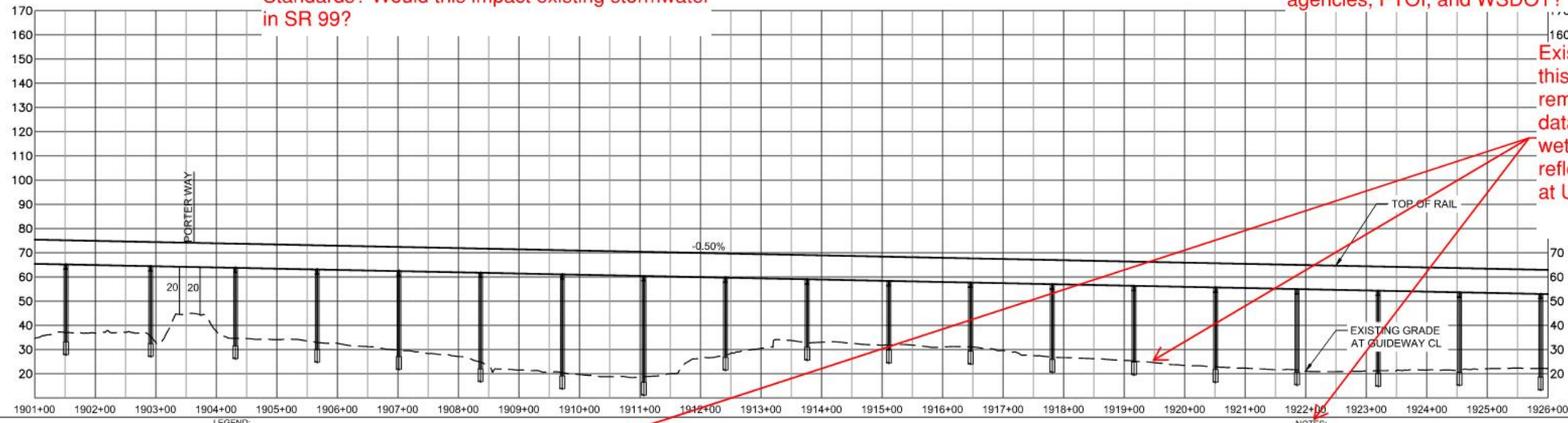


Would this facility footprint and associated excavation depth be in conflict with remediated soil conditions at conclusion of USG site cleanup actions?

The alignment here and proposed stormwater facility extend into the Middle Hylebos site.

Show more recent aerial photo and show the Hylebos RRP Mitigation Site boundary and new Hylebos Creek alignment on plans. The RRP has performance standards that need to be met by WSDOT and will have site protection mechanisms recorded per permit requirements. How will impacts to RRP be avoided? Or how will proposed impacts to RRP be coordinated for approval through agencies, PTOI, and WSDOT?

Would this alignment include improvements along the SR 99 frontage to build out per Milton Standards? Would this impact existing stormwater in SR 99?



Existing grade has changed as RRP in this area was graded and USG site was remediated in summer 2024. Survey data and basis of design stream and wetland layer will require updates to reflect new existing conditions. Grading at USG site will also require an update.

HORIZ: 100 50 0 100 200 SCALE IN FEET

VERT: 50 25 0 50 100 SCALE IN FEET

LEGEND:

- COLUMNS / STRADDLE BENTS
- STATION PLATFORM
- CONSTRUCTION LIMITS
- TRANSIT WAY LIMITS
- WSDOT COMPATIBILITY LINE
- BASIS OF DESIGN STREAM (SEE NOTE 1)
- BASIS OF DESIGN WETLAND (SEE NOTE 1)
- SURVEYED STREAM (SEE NOTE 2)
- SURVEYED WETLAND (SEE NOTE 2)

NOTES:
1) THE BASIS OF DESIGN STREAM AND WETLAND LAYER (2019-GIS) WAS USED TO INFORM THE DEVELOPMENT OF THE MAY 2020 TDLE 10% CONCEPTUAL ENGINEERING PLANS AND THE AUGUST 2023 10% CONCEPTUAL ENGINEERING ADDENDUM 1 PLANS (WHERE LOCATED OUTSIDE OF THE 2020 STREAM/WETLAND SURVEY AREA).

2) THE SURVEYED AND ESTIMATED STREAM AND WETLAND DATA COLLECTED BY THE PROJECT TEAM WAS USED TO CALCULATE THE DRAFT EIS IMPACTS.

ALL SFW TO FIFE ALTERNATIVES
TRACK PLAN AND PROFILE
STA 1901+00 TO STA 1926+00

A00-KAP11
57

7/3/2024 12:39:17 PM MLARSON
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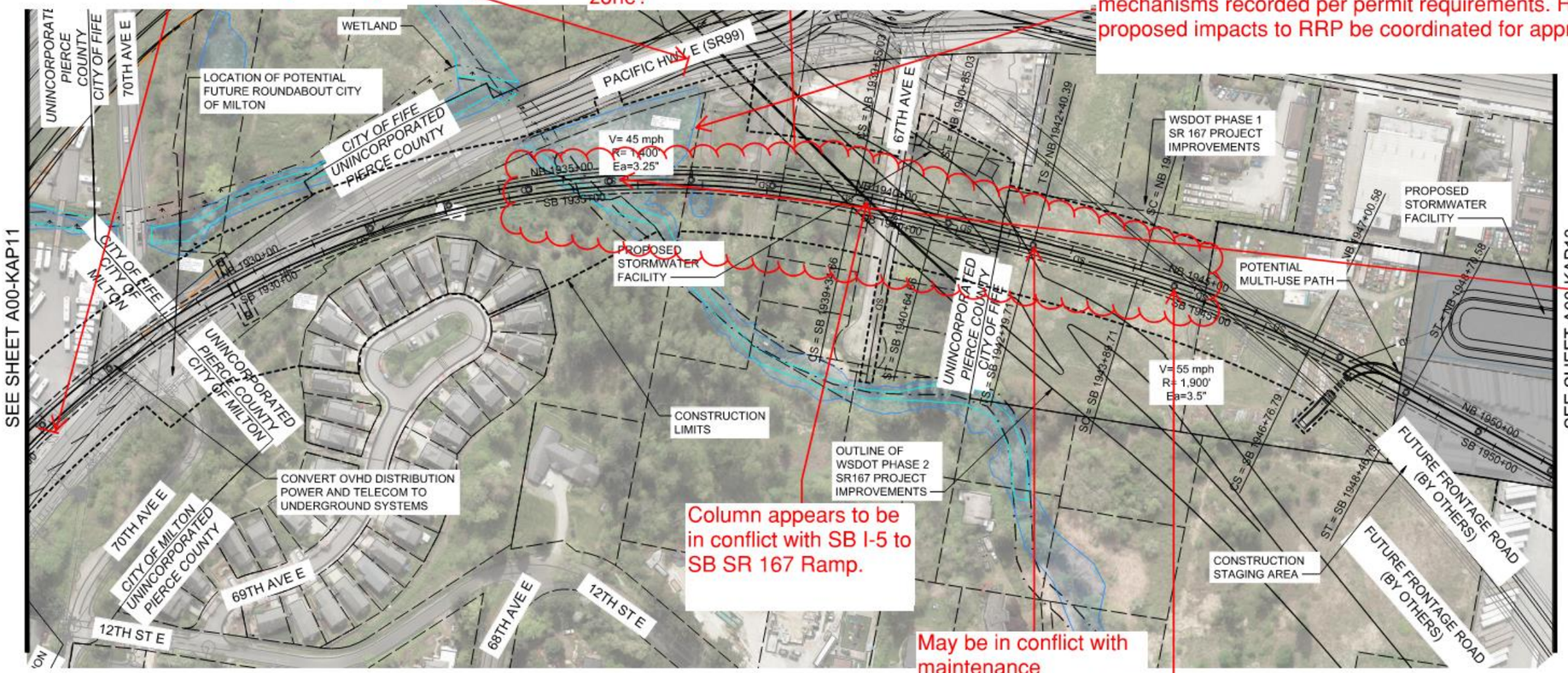
WSDOT widens, adds 10-ft sidewalks, and vegetated landscape buffers along both sides of SR 99 from ~70th to Wapato Way.

WSDOT will be replanting this corridor as part of SR 167 Stage 1b Project. Will plants need to be redone by Sound Transit if within their overhead guideway zone?

Show more recent aerial photo and show the Hylebos RRP Mitigation Site boundary on plans. The RRP has performance standards that need to be met by WSDOT and will have site protection mechanisms recorded per permit requirements. How will impacts to RRP be avoided? Or how will proposed impacts to RRP be coordinated for approval through agencies, PTOI, and WSDOT?

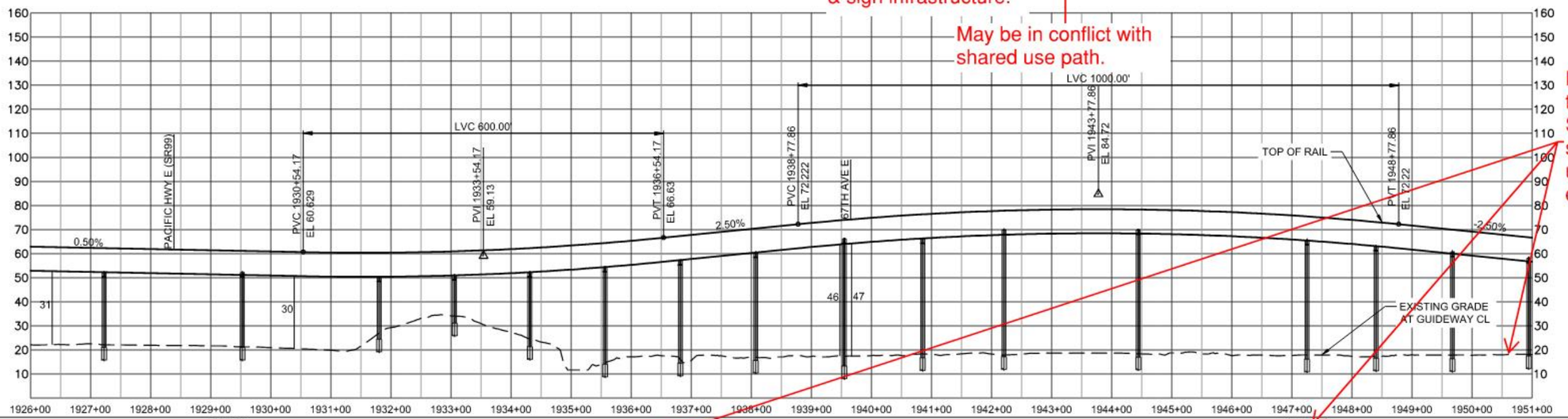
This portion of the alignment crosses Lower Hylebos South Hylebos RRP site and the shown support column may be in conflict with realigned Hylebos Creek. If the alignment doesn't change, it should clear span the mitigation site and minimize wetland, buffer, and floodplain impacts. What is the height of the structure in this location? Will shading impacts be an issue?



Column appears to be in conflict with SB I-5 to SB SR 167 Ramp.

May be in conflict with maintenance pullout/drainage/signall & sign infrastructure.

May be in conflict with shared use path.



Existing grade has changed as RRP in this area was graded in summer 2024. Survey data and basis of design stream and wetland layer will require updates to reflect new existing conditions.

HORIZ: 100 50 0 100 200 SCALE IN FEET

VERT: 50 25 0 50 100 SCALE IN FEET

LEGEND:
- COLUMNS / STRADDLE BENTS
- STATION PLATFORM
- CONSTRUCTION LIMITS
- TRANSIT WAY LIMITS
- WSDOT COMPATIBILITY LINE
- BASIS OF DESIGN STREAM (SEE NOTE 1)
- BASIS OF DESIGN WETLAND (SEE NOTE 1)
- SURVEYED STREAM (SEE NOTE 2)
- SURVEYED WETLAND (SEE NOTE 2)

NOTES:
1) THE BASIS OF DESIGN STREAM AND WETLAND LAYER (2019-GIS) WAS USED TO INFORM THE DEVELOPMENT OF THE MAY 2020 TDLE 10% CONCEPTUAL ENGINEERING PLANS AND THE AUGUST 2023 10% CONCEPTUAL ENGINEERING ADDENDUM 1 PLANS (WHERE LOCATED OUTSIDE OF THE 2020 STREAM/WETLAND SURVEY AREA).
2) THE SURVEYED AND ESTIMATED STREAM AND WETLAND DATA COLLECTED BY THE PROJECT TEAM WAS USED TO CALCULATE THE DRAFT EIS IMPACTS.

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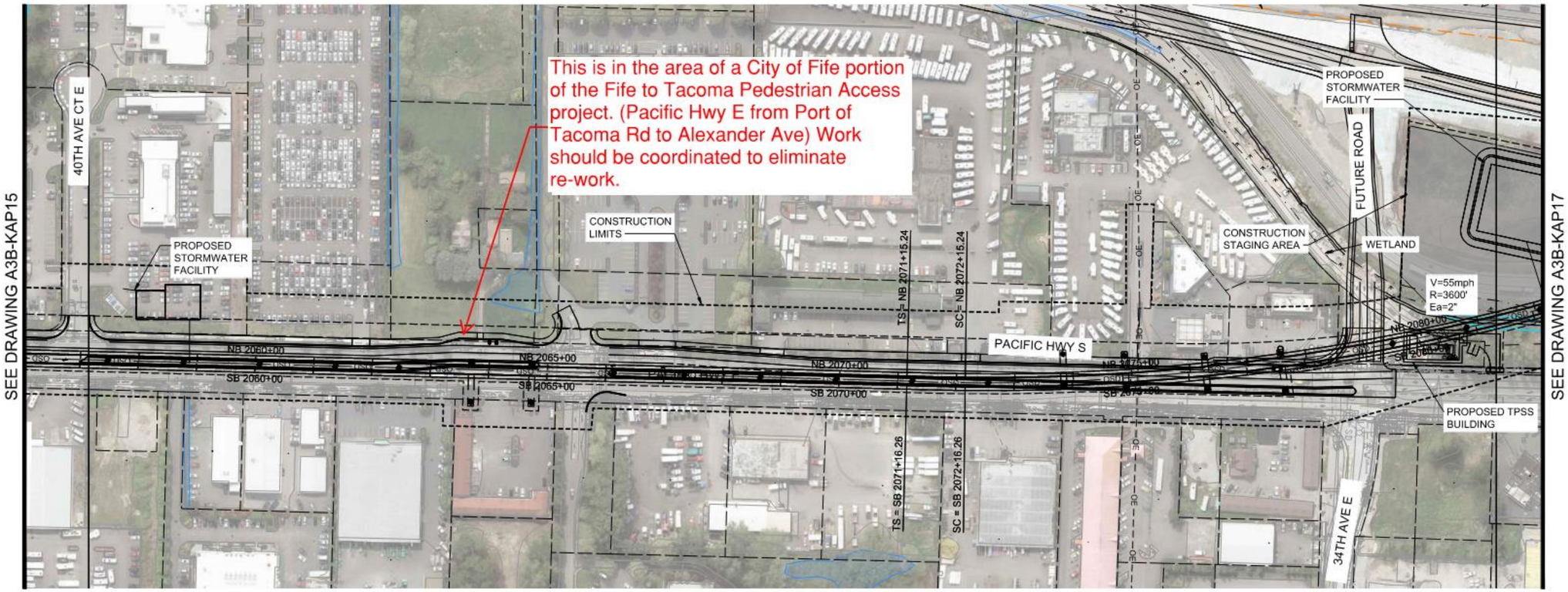

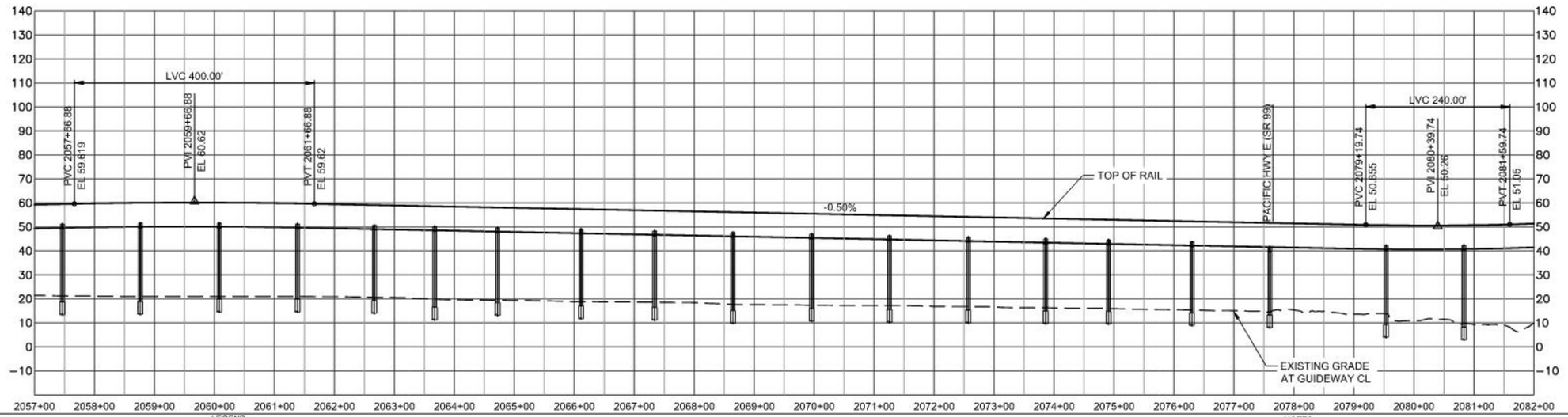

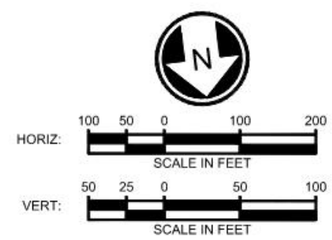

LEGEND:

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