



Operations and Maintenance Facility South

Appendix L2:
2023 Draft EIS Comments
and Responses

Table of Contents

Tribes and Agencies	L2-1
Suquamish Tribe (Communication ID 538027)	L2-2
EPA (Communication ID 539079)	L2-4
FHWA (Communication ID 539007)	L2-27
WSDOT (Communication ID 539078)	L2-54
City of Federal Way (Communication ID 539072)	L2-64
Public Commenters	L2-165
Barry Turnbull (Communications ID 537037)	L2-166
Glenn Sawyer (Communications ID 537189)	L2-168
Anonymous/OOH (Communications ID 537204)	L2-170
Anonymous/OOH (Communications ID 537207)	L2-172
Jacob Davidson (Communications ID 537209)	L2-174
Anonymous/OOH (Communications ID 537210)	L2-176
Anonymous/OOH (Communication ID 537211)	L2-178
Eric Johnson (Communication ID 537212)	L2-180
Sue Cornell (Communication ID 537213)	L2-182
Glenn Sawyer (Communication ID 537214)	L2-184
Anonymous/OOH (Communications ID 537215)	L2-186
Dusty Wilson (Communications ID 537217)	L2-188
Kay Vallejo (Communications ID 537218)	L2-190
Eduardo Munoz (Communications ID 537672)	L2-192
Rick Barnett (Communications ID 537673)	L2-194
Francois Ryf (Communication ID 537687)	L2-196
Leota Miller (Communications ID 537872)	L2-198
Karl Hallesy (Communications ID 538026)	L2-200
Patricia Clayton (Communications ID 538156)	L2-202
Anonymous/OOH (Communications ID 538473)	L2-204
Bill Pugnetti (Communications ID 538475 and 538479)	L2-206
Patricia Pugnetti (Communications ID 538480)	L2-208
Susan Strong (Communications ID 539015)	L2-210
Kerry Lesinski (Communications ID 539016)	L2-212
Miguel Torres, Olivia Torres (Communications ID 539020)	L2-217

Helen Price (Communications ID 539021).....	L2-219
Tilena Cooper (Communications ID 539023).....	L2-221
Anonymous/Belmor Briefing (Communications ID 539026).....	L2-223
Patricia Pugnetti (Communications ID 539033)	L2-226
Bob Strong (Communication ID 539034)	L2-229
Vickie Chynoweth (Communications ID 539042).....	L2-231
Michael Hoag (Communications ID 539043)	L2-233
Bill Pugnetti (Communications ID 539044)	L2-235
Karen Brugato (Communications ID 539045)	L2-237
Suzanne Vargo (Communications ID 539046).....	L2-239
Francine Martin (Communications ID 539047)	L2-241
Lawson Bronson (Communications ID 539048).....	L2-243
Susan Strong (Communications ID 539049).....	L2-245
Eugene Onishchenko (Communications ID 539051)	L2-247
Russ Hibbard (Communications ID 539052).....	L2-249
William Terrance (Communications ID 539053)	L2-251
Bruce Tecklenburg (Communications ID 539054)	L2-253
Finn S (Communications ID 539055)	L2-255
Jacob Davidson (Communication ID 539056).....	L2-257
Lani Akers (Communication ID 539057)	L2-259
Suzanne Vargo (Communications ID 539061).....	L2-264
Dave Lesinski (Communications ID 539062)	L2-269
Bob Strong (Communications ID 539063)	L2-274
Julie Seitz (Communications ID 539077)	L2-276
Jacob Davidson (Communications ID 539081).....	L2-281
GarageTown Federal Way Condominium Association (Communication ID 539132)	L2-283
Roger Flygare (Communications ID 539987).....	L2-291

Tribes and Agencies

From: Stephanie Trudel <strudel@Suquamish.nsn.us>

Sent: Wednesday, October 11, 2023 1:32 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: NEPA Draft/SEPA Supplemental Draft EIS for the Operations and Maintenance Facility (OMF) South project

Thank you for the opportunity to review and comment on the NEPA Draft/SEPA Supplemental Draft EIS for the Operations and Maintenance Facility (OMF) South project. I have reviewed the Historical and Archaeological Resources Technical Report and attachments and have no comments or concerns regarding cultural resources at this time.

Sincerely,
Stephanie

Stephanie Trudel
Tribal Historic Preservation Officer
Suquamish Tribe
PO Box 498
Suquamish, WA 98392-0498
360-394-8533
strudel@suquamish.nsn.us

Suquamish Tribe (Communication ID 538027)		
Comment ID	Comment Text	Response
1	I have reviewed the Historical and Archaeological Resources Technical Report and attachments and have no comments or concerns regarding cultural resources at this time.	Thank you for your review.



REGION 10

SEATTLE, WA 98101

November 6, 2023

Justin Zweifel, Environmental Protection Specialist
Federal Transit Administration
915 2nd Ave, Suite 3192
Seattle, Washington 98174

Erin Green, South Corridor Environmental Manager
Sound Transit
401 S Jackson Street
Seattle, Washington 98194

Dear Justin Zweifel and Erin Green:

The U.S. Environmental Protection Agency has reviewed Federal Transit Administration's Draft Environmental Impact Statement for the Operations and Maintenance Facility South Project (CEQ number 20230122, EPA Project Number 23-0027-FTA). 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 EPA and requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement. EPA is one of the cooperating agencies on the project and offered its scoping comments and recommendations in August 2023.

The DEIS evaluates the potential environmental impacts with the construction and operation of a light rail facility in south King County. The proposed facility will be used for light rail vehicle storage, inspection, maintenance and repair, cleaning, and testing and commissioning of new light rail vehicles. The DEIS includes a No-Build Alternative and three build alternatives: the South 336th Street Alternative (Preferred Alternative), South 344th Street Alternative, and Midway Landfill (a Superfund site) Alternative. The Preferred Alternative is also identified as the Preferred Alternative in the 2021 State Environmental Policy Act DEIS for this project.

EPA supports the project's plan to expand mobility in the region for transit dependent people, low-income populations, and communities of color. EPA supports the goals to provide regional transit in a manner that preserves and promotes a healthy environment and economy by minimizing adverse impacts on the environment and people through sustainable practices. Regional public transit has an

important role in reducing vehicle miles traveled and vehicle emissions in an area with heavy traffic congestion.

In reviewing the DEIS, EPA identified that the proposed action has the potential to disproportionately impact communities with environmental justice concerns, including tribal, minority, and low-income communities, and provides recommendations to address these impacts in the Final EIS, including:

- Consistent with Executive Orders 14096 and 12898, further evaluate and identify communities with EJ concerns who may be impacted by the proposed project. Consider utilizing EPA's EJScreen tool, as well as Washington State Department of Health Environmental Health Disparities map to determine environmental risks to the communities with EJ concerns and implications for the proposed project.
- Continue to meaningfully engage with communities with EJ concerns who may be disproportionately impacted by the project, including adjacent neighborhoods, tribes, and statewide and local organizations.
- Describe the efforts to meaningfully engage these communities when analyzing for disproportionate impacts; developing ways to avoid, mitigate and minimize those impacts; and the outcome of the engagement efforts on the proposed project.
- Mechanisms to assess and address potential air quality impacts from the proposed project on communities with EJ concerns.

The enclosed Detailed Comments provide greater detail of these and other concerns, as well as recommendations for the Final EIS.

Thank you for the opportunity to review the DEIS for this project. If you have questions about this review, please contact Theogene Mbabaliye of my staff at (206) 553-6322 and mbabaliye.theogene@epa.gov, or me, at (206) 553-1774 or at chu.rebecca@epa.gov.

Sincerely,

Rebecca Chu, Chief
Policy and Environmental Review Branch

Enclosure

**U.S. EPA Detailed Comments on the
Operations and Maintenance Facility South Project DEIS
King County, Washington
November 2023**

Environmental Justice (EJ)

EPA has concerns about the conclusions made in the DEIS regarding EJ impacts and recommends the FEIS identify, analyze, and address disproportionate impacts in accordance with Executive Order 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All* and the *Guidance from the Council on Environmental Quality on Environmental Justice and the National Policy Act* (CEQ EJ Guidance).¹

EO 14096 directs federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns. It builds upon Executive Order 12898 *Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations*. EO 14096 further states that EPA will carry out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609, to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns.

EPA recommends the EJ topic be analyzed further in Chapter 3 of the Final EIS as its own section, rather than in Appendix E, to highlight the importance of EJ as a part of the affected environment. EPA also offers the following recommendations to fully identify, analyze, and address disproportionate impacts from the proposed project to communities with EJ concerns.

Potential Disproportionate Impacts on Communities with EJ Concerns

The DEIS concludes that “[a]fter considering the project’s potential effects, mitigation, and avoidance measures and anticipated benefits to minority and low-income populations, FTA has made a preliminary determination that the OMF South would not result in disproportionately adverse effects on minority and low-income populations.”² EPA has concerns that the project may have disproportionate impacts and recommends the Final EIS further analyze impacts to communities.

Assessing EPA’s Environmental Justice Screening and Mapping Tool (EJScreen) information is a useful first step in understanding or highlighting locations that may be candidates for further review or outreach.³ EPA considers a project to be in an area of potential EJ concern when an EJScreen for the impacted area shows one or more of the EJ Indexes at or above the 80th percentile in the nation and/or state. We note the DEIS only includes a 0.5-mile radius around the project site to identify communities with EJ concerns. At a minimum, EPA recommends an EJScreen analysis consider EJScreen

¹ https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf. Accessed 9/25/2023.

² DEIS page 3.6-12.

³ <https://ejscreen.epa.gov/mapper/>. Accessed 10/24/2023.

information for the block groups which contains the proposed action and a one-mile radius around those areas.

EPA ran EJScreen with a 1-mi buffer around the project area and found that 10 out of the 12, and 11 out of the 12 EJ Indexes exceeded the 80th percentile when compared to the state, for the preferred alternative location and the midway landfill location, respectively. Exceeded EJ indexes include indicators relating to air quality, including diesel particulate matter at the 98th percentile at the preferred location and the 97th percentile for the Midway Landfill location.

EPA also recommends considering the Washington State Department of Health Environmental Health Disparities map.⁴ This map depicts cumulative health impact as a ranking from 1 to 10, with 10 indicating the highest impact. These rankings reflect the risk each community faces from multiple environmental hazards and the degree to which a community is more vulnerable to those hazards because of certain sociodemographic factors. Rankings for this map can be interpreted as a way to measure relative environmental risk factors in communities. The project area for all alternatives and the surrounding census tracts all rank at 10.

These screening tools indicate that the proposed project is located within an area with potential EJ concerns and that these communities face significant environmental disparities. EPA has concerns that the cumulative impacts of this project and the historically over-burdened nature of the area could have significant potential disproportionate adverse impacts on communities with EJ concerns.

EPA recommends the Final EIS include a more robust analysis of the project's potential impacts to communities with EJ concerns including but not limited to community cohesion, affordable housing, public health impacts, and public safety. EPA is concerned that the project development will further exacerbate a historically over-burdened community.

Mitigation

The DEIS states that disproportionate impacts will not occur due to identified mitigation measures and community benefits. It is unclear in the DEIS if identified mitigation measures will fully offset the disproportionate impacts from the project, especially considering the prior recommendations related to fully identifying where EJ concerns may occur and be impacted by the proposed project. In addition, the benefits identified are not specific to the impacted communities. Finally, it is unclear if mitigation measures and benefits were identified through robust community involvement (e.g., informed by meaningful engagement with the impacted community).

The CEQ EJ Guidance identifies important ways to consider mitigation for EJ under NEPA, including:

- “Mitigation measures identified as part of . . . an environmental impact statement (EIS), or a record of decision (ROD), should, whenever feasible, address significant and adverse environmental effects of proposed federal actions on minority populations, low-income populations, and Indian tribes.”

⁴ <https://doh.wa.gov/data-and-statistical-reports/washington-tracking-network-wtn/washington-environmental-health-disparities-map>. Accessed 10/24/2023.

- “Each Federal agency must provide opportunities for effective community participation in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities and improving the accessibility of public meetings, crucial documents, and notices.”

The DEIS indicates that one of the key benefits to the community would be the generation of 11,200 to 20,000 jobs in the region.⁵ EPA recommends the FEIS provide clarification on this benefit to communities with EJ concerns that are impacted by the project, specifically:

- If job training will be provided to communities most impacted,
- Will additional measures to be taken to hire within the impacted communities for these 11,200 to 20,000 jobs, and
- The types of jobs available to the impacted community (e.g., permanent or temporary; professional or nonprofessional).

If there are no additional tailored mitigation measures to be implemented, provide clarification that the benefit received will be regional job opportunities and are not tailored to the communities with EJ concerns impacted by the proposed project.

EPA recommends developing specific mitigation measures to address the potential disproportionate EJ impacts. In developing mitigation measures, consider mechanisms to minimize impacts of the proposed project to communities. It is important to shape mitigation efforts through engagement with each uniquely impacted group.

An example of a mitigation measure EPA has seen applied in other federal projects to address impacts on communities with EJ concerns 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 places like churches. Developing a CBA involves robust community involvement and meaningful engagement to ensure mitigation measures benefit the most impacted communities. Consider neighborhood plans and goals when identifying mitigation measures to help inform mitigation to offset disproportionate impacts. Community benefits may vary from community to community depending on their unique attributes. Consider reviewing previous strategies to develop a CBA such as FHWA's South End Park neighborhood redevelopment project in which community members helped inform innovative mitigation measures.⁶

EPA notes that CEQ's EJ Guidance states that “agencies should recognize the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed agency action. These factors should include the physical sensitivity of the community or population to particular impacts; the effect of any disruptions on the community structure associated with the proposed action; and the nature and degree of the impact on the physical and social structure of the community.”⁷

⁵ DEIS page E-25.

⁶ https://www.fhwa.dot.gov/environment/environmental_justice/resources/ej_and_nepa/case_studies/case08.cfm. Accessed 10/24/2023.

⁷ CEQ EJ Guidance, page 9.

To address these interrelated factors that may amplify the natural and physical environmental effects of the proposed agency action, EPA further recommends the Final EIS include specific information and measures related to compensation and relocation assistance for low-income and minority residences and minority-owned businesses that could be acquired, displaced, and relocated by the project. Include in the Final EIS additional information and measures to address the temporary or long-term loss of services to low-income and minority communities provided by community organizations, such as the Christian Faith Center that has daycare services, that will either be relocated by the project or affected during construction of the project. It will also be important for FTA to discuss in the Final EIS plans to resolve conflicts that could arise from businesses and residents that might refuse easement offers.

Meaningful Public Engagement

In addition to fully characterizing the communities with EJ concerns who may be impacted by the proposed project, EPA recommends conducting meaningful engagement to ensure community feedback is reflected in the decision-making process. EPA appreciates FTA's efforts to inform the public and has recommendations to involve the public more meaningfully to help identify mitigation measures to disproportionate impacts on communities with EJ concerns.

EPA recommends mitigation efforts be guided by meaningful public engagement with impacted communities. CEQ guidance states that "agencies should elicit the views of the affected populations on measures to mitigate a disproportionately high and adverse human health or environmental effect...and should carefully consider community views in developing mitigation strategies."⁸

EO 14096 states [federal agencies are] to "provide opportunities for the meaningful engagement of persons and communities with environmental justice concerns who are potentially affected by Federal activities including by providing timely opportunities for members of the public to share information or concerns and participate in decision-making processes, fully considering public input provided as part of decision-making processes, and providing notice of and engaging in outreach to communities or groups of people who are potentially affected and who are not regular participants in Federal decision-making."

Given the above, EPA recommends:

- Designing robust community engagement practices to maximize participation opportunities for communities that would be affected by the project, such as community-based workshops to facilitate discussion and issue resolution.
- Creating community advisory committees with representatives from impacted communities to help facilitate guidance and feedback from community members.
- Hosting focus group discussions to have robust conversations around mitigation that is appropriate to each impacted community.

EPA has concerns that while efforts have been made to inform the public, the public's feedback has not been fully incorporated into the decision-making process and/or addressed in the NEPA process. EPA recommends the Final EIS include more details on how input from impacted communities is considered

⁸ CEQ EJ Guidance, page 16.

in this process, including the selection of the preferred alternative, and ensure that public input is fully considered and responded too in the decision-making process.

The CEQ EJ Guidance specifies that “[u]nder NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmental unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population.”⁹

Potential Impacts to Air Quality

The DEIS states that, “[a]lthough portions of the Puget Sound region are in maintenance areas for PM_{2.5} and PM₁₀, none of the build alternatives are located within nonattainment or maintenance areas.” While this may be true, it is also possible that local air quality may still be impacted due to cumulative impacts from surrounding activities such as road construction and site operations, traffic on unpaved roads and others, including use of woodstoves, agriculture, fire, and air traffic. EJScreen indicates EJ indexes above the 90th percentile for diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index at all alternative locations, and above the 80th percentile for particulate matter at the preferred alternative location. This is consistent with the WA Health Disparities Map which ranks diesel exhaust PM_{2.5} emissions at a 9 out of 10 for all locations. Changes in climate may also result in increased air pollution from future wildfires.¹⁰ In our scoping comments for the project in August, EPA had also indicated that evaluation of cumulative impacts on air quality will be important because of this project sites proximity to the Tacoma PM_{2.5} maintenance area.

Because of this project’s potential air quality impacts, EPA recommends the Final EIS:

- Estimate air emissions from all sources (e.g., stationary and mobile sources) for the analysis area; discuss the timeframe for release of these emissions; and determine whether the emissions will exceed National Ambient Air Quality Standards (NAAQS). For accurate air emission estimates, use the latest version of EPA’s Motor Vehicle Emission Simulator (MOVES3).¹¹ The DEIS does not currently provide baseline data on air quality to help determine the extent to which the project will impact air quality in the project area and vicinity. EPA recommends an assessment of baseline conditions be conducted and disclosed in the Final EIS, including a summary of representative background concentration of criteria air pollutants and any relevant information regarding local air toxics, if available.
- Expand the fugitive dust plan for the alternative project sites, particularly to identify nearby sensitive receptors and measures to protect these from dust impacts. Describe in the plan how the nearby public will be kept informed of the project and be provided contact methods to report fugitive dust impacts.

⁹ Council on Environmental Quality. Environmental Justice Guidance Under the National Environmental Policy Act, pg. 10. https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf. Accessed 10/25/2023.

¹⁰ <https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-wa.pdf>. Accessed 10/26/2023.

¹¹ <https://www.epa.gov/moves/latest-version-motor-vehicle-emission-simulator-moves>. Accessed 10/29/2023.

- Include a summary of the project-related Mobile Source Air Toxics analysis results using the most recent EPA model for analysis of these emissions and related health risks.¹² If there will be significant air toxics emissions, consider giving preference to contractors using highest engine Tier available (Tier 3 or 4) machinery to reduce air toxics emissions during implementation of the project. During project site preparation, the DEIS indicates there will be up to 564 truck trips per day traveling to and from the project site. As this number does not account for the project construction and overall cumulative traffic in the area, it is possible that mobile source air toxics emissions from the project and other surrounding sources could be significant and warrant further analysis.
- Ensure the above analyses include off-site mobile source air emissions of vehicles and trucks along likely corridors to and from the facility from both the construction and operations of the project with respect to criteria air pollutants and air toxics, including diesel particulate matter emissions. Consider sensitive receptors and vulnerable populations such as communities with EJ concerns, park/recreational users, schools, daycares, seniors/nursing homes, hospitals, and other healthcare facilities. The air quality analysis does not currently include health-related risks associated with diesel exhaust emissions. Providing a diesel exhaust emissions analysis of the long-term increased truck traffic and its impact on the surrounding community will be helpful.
- Identify appropriate mitigation measures and best management practices to reduce emissions and comply with federal and state air quality regulations.
- Discuss plans to monitor air quality in the project area and take corrective action if the NAAQS are not met. This is important because there are sensitive receptors in the project area and motor vehicle traffic may increase in the area, particularly during project construction. Localized air quality conditions can be substantial (e.g., during wildfire burns), even though area-wide and/or long-term emissions monitoring may show compliance with NAAQS. Consideration of the cumulative health impacts caused by the project (construction, operation, and maintenance phases) and other sources to communities with EJ concerns will also be important, as well as coordination with public health agencies and industry, which often have data on human health and environmental hazards.
- Clarify whether the project analysis area is adjacent to the maintenance area for PM_{2.5} and discuss when the maintenance period will end or be renewed. If the site is adjacent to this maintenance area and a conformity determination analysis is conducted, then, provide results of such analysis in the Final EIS. It may also be prudent to monitor air locally and take corrective action if NAAQS are exceeded, even if temporarily.
- Provide information on coordination with other entities in the area, such as the State of Washington Departments of Ecology and Social and Health Services and local air organizations, to ensure emissions due to the proposed project are reduced and effectively mitigated throughout the proposed project lifespan.

Potential Impacts to Surface Water Quality and Beneficial Uses

As construction and operation activities may impact water resources, resulting in alterations of local hydrology and long-term impacts to water quality parameters and designated beneficial uses due to

¹² <https://www.epa.gov/AirToxScreen>. Accessed 10/29/2023.

increased turbidity and sedimentation of these pollutant receiving waters, EPA recommend that the Final EIS:

- Include information on the most recent EPA-approved Water Quality Standards (WQS) for the State of Washington and implications for water quality protection within waterbodies in the analysis area and vicinity. It would be important for the public to know the State WQS to determine the extent to which the proposed action would impact water quality. The DEIS indicates that Build Alternatives will likely impact two already impaired tributaries on current Washington State's 303(d) list due to exceedances of copper, lead, polycyclic aromatic hydrocarbons (PAHs), pH, and zinc WQS within the West Fork Hylebos tributary; and bacteria, dissolved oxygen in McSorley Creek. Under the Preferred Alternative, there will also be a loss of riparian vegetation which may contribute to long-term impacts to water resources in the project area and downstream areas, including increased stream temperatures; decreased runoff interception and pollutant filtration functions; reduced groundwater recharge; increased erosion and sedimentation; and loss of stream channel stabilization.¹³
- Discuss the project impacts analyses and conclusions based on the most recent WQS information. Where WQS are exceeded, it will be important for the FEIS to discuss how these impaired waterbodies will be restored.
- Provide the most current information regarding the status of the Clean Water Act § 401 certification and § 404 permit application processes, as well as conditions to protect water quality and wetlands.
- Include up-to-date information on the anticipated Pollutant Discharge Elimination System (NPDES) permit application process including measures to protect water quality and development of Storm Water Pollution Prevention Plans, reporting, and monitoring. The DEIS indicates that project construction will disturb more than 1 acre of land (up to 68 acres), which will subject the project to NPDES permitting requirements for discharges to waters of the United States and related Stormwater Pollution Prevention Plan and construction best management practices.
- Consider implementation of low impact development techniques, which have the potential to further reduce stormwater volumes and thus mimic natural conditions as closely as possible. The techniques also lessen impacts of stormwater runoff from impervious surfaces such as paved roads, parking lots, and roofs and can provide energy and other utility savings.
- Describe plans to coordinate with the Washington State Department of Ecology and all affected tribes to assure that state and tribal water resources are protected from impacts associated with the proposed project's construction, operation, and maintenance activities.

The DEIS indicates that water quality may be adversely affected if the project construction activities (excavation, digging, bulldozing, surface pavement, earthwork and grading, stream relocation, etc.) alter the hydrology of springs and surface runoff such that erosion carries sediment to surface waters and pollutants to local drainages and the underlying aquifer. In addition, land disturbance, material storage, waste disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic can all affect recharge to the local aquifer and groundwater quality. The Build

¹³ DEIS, p. 3.11-12.

Alternatives may also result in unavoidable permanent direct, indirect, and temporary impacts to wetlands and their buffers.

Potential Impacts on Contaminated Sites and Monitoring

If the FTA and Sound Transit reconsider the Midway Landfill Alternative, EPA recommends FTA coordinate with EPA R10 Superfund Program as the project is implemented so that project activities are consistent with agreed upon remedies for the Midway Landfill Superfund site. The EPA Remedial Program Manager is Ashley Grompe, and she may be reached at (206) 553-1284 or grompe.ashley@epa.gov. It will also be helpful to coordinate with Washington State Department of Ecology so that the FEIS identifies all the contaminated sites in the planning area and vicinity and discusses measures to take to minimize project impacts and meet state requirements.

The DEIS identifies several existing contaminated sites in the project area (up to 64 sites), and the possibility that more contaminated sites could be discovered during construction and operation of the project. Identification of the sites was also limited to a 1/8-mile radius, which is less than the suggested 1-mile radius used for identification of contaminated sites.¹⁴

Potential Impacts to Biological Resources

We recommend that the Final EIS include information on working with the U.S. Fish and Wildlife Service and National Marine Fisheries Service, and, as appropriate, with the Washington Department of Fish and Wildlife, including recommended measures to reduce risks and protect biota and habitat. The DEIS indicates the proposed project activities may impact federally and state protected species occurring in the project area and vicinity, such as the threatened Puget Sound Chinook salmon, Puget Sound steelhead, and bull trout. Because of their potential to support fish use, the East and West Fork Hylebos tributaries in the project area are also designated as essential fish habitat for Pacific salmon.

The impacts to biological resources will be due to the anticipated loss and degradation of suitable habitats and cover; increased sediment delivery to streams, resulting in increased turbidity; and higher than optimal noise levels during project construction activities that will involve use of excavators and other heavy equipment or machinery. EPA also encourages the FTA to include in the FEIS information on the outcomes of consultations with the Services and coordination with the state agency.

Coordination with Tribes

EPA encourages FTA to incorporate feedback from Tribes when making decisions regarding the project and recommends the FEIS describe the issues raised during government-to-government consultations and how those issues were addressed.

Monitoring of the Project and Adaptive Management

EPA recommends the FEIS include a monitoring program designed to assess both impacts from activities and effectiveness of mitigation measures for the impacts and indicate how the program will use an effective feedback mechanism, such as adaptive management, so that any needed adjustments can be made to the activities to meet environmental objectives during project implementation. For example, there could be a plan to monitor noise impacts during project construction and take corrective action if noise complaints or damage claims exceed existing levels.

¹⁴ <https://wsdot.wa.gov/sites/default/files/2021-10/Env-HazMat-ERSECSGuidance.pdf>. Accessed 10/30/2023.

Social Cost of Greenhouse Gases

EPA acknowledges the DEIS quantifies the greenhouse gas emissions for operations, maintenance, and construction, including haul truck emissions, for the proposed alternatives. EPA continues to recommend the FEIS estimate the social cost of GHG emissions (SC-GHG) for each alternative to facilitate decisionmakers' and the public's evaluation of the proposed alternatives by monetizing the calculated GHG emissions. This is in alignment with CEQ's January 9, 2023 interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews.¹⁵ This guidance was in response to EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*.¹⁶ Alternatively, if choosing to not include SC-GHG in the analysis, provide a basis for that decision.

¹⁵ <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate>. Accessed 11/3/2023.

¹⁶ <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate>. Accessed 11/3/2023.

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
1	<p>Environmental Justice (EJ)</p> <p>EPA has concerns about the conclusions made in the DEIS regarding EJ impacts and recommends the FEIS identify, analyze, and address disproportionate impacts in accordance with Executive Order 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All and the Guidance from the Council on Environmental Quality on Environmental Justice and the National Policy Act (CEQ EJ Guidance).</p> <p>EO 14096 directs federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns. It builds upon Executive Order 12898 Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations. EO 14096 further states that EPA will carry out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609, to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns.</p>	<p>FTA recognizes EPA's oversight responsibilities under Executive Order (EO) 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All, which was enacted on April 21, 2023. EO 14096 does not rescind EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which has been in effect since February 11, 1994, and is currently implemented through DOT Order 5610.2C. FTA continues this implementation for all projects, including OMF South, until further guidance is provided regarding the implementation of EO 14096 on environmental justice. This has been clarified in Appendix E, Environmental Justice Assessment, of the Final EIS.</p>
2	<p>EPA recommends the EJ topic be analyzed further in Chapter 3 of the Final EIS as its own section, rather than in Appendix E, to highlight the importance of EJ as a part of the affected environment. EPA also offers the following recommendations to fully identify, analyze, and address disproportionate impacts from the proposed project to communities with EJ concerns.</p>	<p>A summary of the Environmental Justice Assessment is included in Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods, in the Final EIS. This section was renamed between the publication of the 2023 Draft EIS and the Final EIS to include "Environmental Justice" in the title. Additionally, an environmental justice summary is included in the Executive Summary of the Draft and Final EIS.</p>
3	<p>Potential Disproportionate Impacts on Communities with EJ Concerns</p> <p>The DEIS concludes that "[a]fter considering the project's potential effects, mitigation, and avoidance measures and anticipated benefits to minority and low-income populations, FTA has made a preliminary determination that the OMF South would not result in disproportionately adverse effects on minority and low-income populations." EPA has concerns that the project may have disproportionate impacts and recommends the Final EIS further analyze impacts to communities.</p>	<p>Based on EPA's comments, FTA and Sound Transit conducted additional analysis on potential impacts to minority and low-income populations. This has included evaluating potential impacts at the block group level and evaluating potential cumulative impacts using the EJScreen tool. FTA and Sound Transit also expanded the discussion on the project mitigation and benefits. These updates are reflected in Appendix E, Environmental Justice Assessment, of the Final EIS. After consideration of the additional analysis, FTA maintains the preliminary determination that OMF South would not result in disproportionately adverse effects on environmental justice populations.</p>
4	<p>Assessing EPA's Environmental Justice Screening and Mapping Tool (EJScreen) information is a useful first step in understanding or highlighting locations that may be candidates</p>	<p>Appendix E, Environmental Justice Assessment, of the Final EIS uses census data to characterize the study area consistent with FTA's guidance. This is</p>

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
	<p>for further review or outreach. EPA considers a project to be in an area of potential EJ concern when an EJScreen for the impacted area shows one or more of the EJ Indexes at or above the 80th percentile in the nation and/or state. We note the DEIS only includes a 0.5-mile radius around the project site to identify communities with EJ concerns. At a minimum, EPA recommends an EJScreen analysis consider EJScreen information for the block groups which contains the proposed action and a one-mile radius around those areas.</p> <p>EPA ran EJScreen with a 1-mi buffer around the project area and found that 10 out of the 12, and 11 out of the 12 EJ Indexes exceeded the 80th percentile when compared to the state, for the preferred alternative location and the midway landfill location, respectively. Exceeded EJ indexes include indicators relating to air quality, including diesel particulate matter at the 98th percentile at the preferred location and the 97th percentile for the Midway Landfill location.</p>	<p>the same census data used by EJScreen and results in a similar characterization of EJ populations. Sound Transit updated Appendix E, Environmental Justice Assessment of the Final EIS to reflect the EJScreen outputs in Section 5.3, Cumulative Impacts, and Attachment A, EJ Screen Reports.</p> <p>The 0.5-mile study area was used because it captures (1) the area of potential direct and indirect impacts from project construction and operation and (2) the demographic characteristics of the population that is most likely to experience impacts of the project. For example, a larger study area of 1.0 mile would reduce the percent of low-income and minority populations and include populations that would not be as directly affected by the project. This approach is consistent with FTA's Circular C-4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients, that states, "The boundaries of your unit of geographic analysis should be large enough to include the area likely to experience adverse effects, but not so large as to artificially dilute the minority population and/or low-income population." Appendix E Section 2.1, Study Area, has been updated to provide additional information on why a 0.5-mile study area is used.</p>
5	<p>EPA also recommends considering the Washington State Department of Health Environmental Health Disparities map. This map depicts cumulative health impact as a ranking from 1 to 10, with 10 indicating the highest impact. These rankings reflect the risk each community faces from multiple environmental hazards and the degree to which a community is more vulnerable to those hazards because of certain sociodemographic factors. Rankings for this map can be interpreted as a way to measure relative environmental risk factors in communities. The project area for all alternatives and the surrounding census tracts all rank at 10.</p>	<p>Appendix E, Environmental Justice Assessment, of the Final EIS has been updated to include a summary of Washington Department of Health Environmental Health Disparities map data. This provides an additional level of information about the affected environment and existing conditions but does not change the impact analysis because the project is not anticipated to compound issues identified by the Disparities Map.</p>
6	<p>These screening tools indicate that the proposed project is located within an area with potential EJ concerns and that these communities face significant environmental disparities. EPA has concerns that the cumulative impacts of this project and the historically over-burdened nature of the area could have significant potential disproportionate adverse impacts on communities with EJ concerns.</p> <p>EPA recommends the Final EIS include a more robust analysis of the project's potential impacts to communities with EJ concerns including but not limited to community cohesion, affordable housing, public health impacts, and public safety. EPA is concerned that the project development will further exacerbate a historically over-burdened community.</p>	<p>Section 5.3, Cumulative Impacts, of Final EIS Appendix E, Environmental Justice Assessment, has been updated to include consideration of the EJScreen tool outputs. It identifies that the project study area is in the 80th and 90th percentiles for many of the environmental indexes when compared to national and state data.</p> <p>One of the EJScreen indexes is Superfund proximity. The Midway Landfill Alternative would affect a Superfund site. As described in Section 3.13, Hazardous Materials, of the Final EIS, Sound Transit would coordinate with EPA and Ecology to identify and implement appropriate mitigation measures. The project would not have adverse impacts related to other EJScreen indexes.</p>

	Comment Text	Response
		<p>The Environmental Justice Assessment also evaluates potential impacts to environmental justice populations for all elements of the environment, including community cohesion, affordable housing, public health, and public safety. Potential impacts to community cohesion and affordable housing, public health, and public safety are also described in more detail in Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods; Section 3.8, Air Quality and Greenhouse Gases; Section 3.13, Hazardous Materials; and Section 3.14, Public Services, of the Final EIS. With implementation of best management practices and mitigation for hazardous materials related to the Midway Landfill Alternative, no adverse impacts are identified for these elements of the environment.</p>
7	<p>Mitigation</p> <p>The DEIS states that disproportionate impacts will not occur due to identified mitigation measures and community benefits. It is unclear in the DEIS if identified mitigation measures will fully offset the disproportionate impacts from the project, especially considering the prior recommendations related to fully identifying where EJ concerns may occur and be impacted by the proposed project. In addition, the benefits identified are not specific to the impacted communities. Finally, it is unclear if mitigation measures and benefits were identified through robust community involvement (e.g., informed by meaningful engagement with the impacted community).</p> <p>The CEQ EJ Guidance identifies important ways to consider mitigation for EJ under NEPA, including:</p> <ul style="list-style-type: none"> • “Mitigation measures identified as part of ... an environmental impact statement (EIS), or a record of decision (ROD), should, whenever feasible, address significant and adverse environmental effects of proposed federal actions on minority populations, low-income populations, and Indian tribes.” • “Each Federal agency must provide opportunities for effective community participation in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities and improving the accessibility of public meetings, crucial documents, and notices.” 	<p>Sound Transit has updated Appendix E, Environmental Justice Assessment, of the Final EIS to include additional information on project mitigation and benefits. Impacts to environmental justice populations would be mitigated with the exception of visual impacts from the Preferred and South 344th Street alternatives. The project would also provide direct and indirect benefits. Direct benefits include:</p> <ul style="list-style-type: none"> • Enhanced community connectivity for the Preferred Alternative through public space and a multi-use trail integrated into the site design that would benefit the surrounding community • Construction jobs with project labor agreements and a DBE program to support hiring of minority populations • Creation of new jobs to operate the facility that could benefit both environmental justice and non-environmental justice populations <p>Indirect benefits include supporting the Sound Transit 3 system expansion by providing capacity to ensure transit reliability, access, connectivity, and frequency.</p> <p>Sound Transit and FTA have completed robust community engagement for the project. Engagement methods included online and in-person outreach, existing community efforts, media advertisements, English and translated materials (in Spanish, Korean, and Russian), and additional outreach efforts to ensure continual engagement and availability of information throughout Early Scoping, Scoping, 2021 SEPA Draft EIS publication, and 2023 NEPA Draft/SEPA Supplemental Draft EIS publication. Public input on proposed mitigation measures was solicited through the community engagement for the 2021 and 2023 Draft EIS publications.</p>

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
		Appendix E, Environmental Justice Assessment, of the Final EIS was also updated to reflect the community engagement activities that occurred as part of the 2023 Draft EIS publication. Additional information on this engagement is described in Appendix B, Public Involvement and Agency Coordination, of the Final EIS.
8	<p>The DEIS indicates that one of the key benefits to the community would be the generation of 11,200 to 20,000 jobs in the region. EPA recommends the FEIS provide clarification on this benefit to communities with EJ concerns that are impacted by the project, specifically:</p> <ul style="list-style-type: none"> • If job training will be provided to communities most impacted, • Will additional measures to be taken to hire within the impacted communities for these 11,200 to 20,000 jobs, and • The types of jobs available to the impacted community (e.g., permanent or temporary; professional or nonprofessional). <p>If there are no additional tailored mitigation measures to be implemented, provide clarification that the benefit received will be regional job opportunities and are not tailored to the communities with EJ concerns impacted by the proposed project.</p>	<p>Section 3.5, Economics, of the Final EIS has been updated to provide additional information on the direct and indirect economic output generated by the project. Direct employment generated by construction of OMF South would equate to between approximately 5,600 and 12,000 job years (defined as full-time employment for one person over the course of a year), depending on alternative.</p> <p>Final EIS Appendix E, Environmental Justice Assessment, clarifies that OMF South would result in approximately 610 permanent high-skilled, living wage jobs and that Sound Transit would implement Project Labor Agreements and a Disadvantaged Business Enterprise Program that are targeted to benefit minority or low-income populations and promote a local workforce.</p> <p>Sound Transit acknowledges that the potential for jobs may or may not benefit the affected EJ population of the project or within the study area.</p>
9	<p>EPA recommends developing specific mitigation measures to address the potential disproportionate EJ impacts. In developing mitigation measures, consider mechanisms to minimize impacts of the proposed project to communities. It is important to shape mitigation efforts through engagement with each uniquely impacted group.</p> <p>An example of a mitigation measure EPA has seen applied in other federal projects to address impacts on communities with EJ concerns 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 places like churches. Developing a CBA involves robust community involvement and meaningful engagement to ensure mitigation measures benefit the most impacted communities. Consider neighborhood plans and goals when identifying mitigation measures to help inform mitigation to offset disproportionate impacts. Community benefits may vary from community to community depending on their unique attributes. Consider reviewing previous strategies to develop a CBA such as FHWA's South End Park neighborhood redevelopment project in which community members helped inform innovative mitigation measures.</p>	<p>Appendix E, Environmental Justice Assessment, of the Final EIS has been updated to provide more detail on the mitigation proposed for project impacts. This includes more robust information on the relocation assistance Sound Transit would provide to displaced residents and businesses. With the exception of visual impacts, all impacts would be mitigated. The analysis has also been updated to provide more information on project benefits.</p> <p>Throughout the OMF South project, Sound Transit has engaged with the affected community. This is documented in the Final EIS in Appendix B, Public Involvement and Agency Coordination, and summarized in Appendix E, Environmental Justice Assessment. Public input on proposed mitigation measures was solicited through the community engagement and public comment processes for the 2021 and 2023 Draft EIS publications. No substantive comments on the proposed mitigation measures were received. Information on impacts and potential mitigation for the project was also shared with property owners and residents throughout the EIS process.</p>

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
10	<p>EPA notes that CEQ's EJ Guidance states that "agencies should recognize the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed agency action. These factors should include the physical sensitivity of the community or population to particular impacts; the effect of any disruptions on the community structure associated with the proposed action; and the nature and degree of the impact on the physical and social structure of the community."</p> <p>To address these interrelated factors that may amplify the natural and physical environmental effects of the proposed agency action, EPA further recommends the Final EIS include specific information and measures related to compensation and relocation assistance for low-income and minority residences and minority-owned businesses that could be acquired, displaced, and relocated by the project. Include in the Final EIS additional information and measures to address the temporary or long-term loss of services to low-income and minority communities provided by community organizations, such as the Christian Faith Center that has daycare services, that will either be relocated by the project or affected during construction of the project. It will also be important for FTA to discuss in the Final EIS plans to resolve conflicts that could arise from businesses and residents that might refuse easement offers.</p>	<p>Section 5.1.1.2 in Appendix E, Environmental Justice Assessment, of the Final EIS has been updated to provide more detailed information on the compensation and relocation assistance that would be provided to residents, businesses, and community facilities that would be displaced by the project. It describes Sound Transit's relocation program, which ensures that all persons displaced by the project are treated consistently and equitably and that Sound Transit tailors the relocation to meet residents' specific needs. It also describes the additional considerations that are taken into account for low-income residents who rent.</p>
11	<p>Meaningful Public Engagement</p> <p>In addition to fully characterizing the communities with EJ concerns who may be impacted by the proposed project, EPA recommends conducting meaningful engagement to ensure community feedback is reflected in the decision-making process. EPA appreciates FTA's efforts to inform the public and has recommendations to involve the public more meaningfully to help identify mitigation measures to disproportionate impacts on communities with EJ concerns.</p> <p>EPA recommends mitigation efforts be guided by meaningful public engagement with impacted communities. CEQ guidance states that "agencies should elicit the views of the affected populations on measures to mitigate a disproportionately high and adverse human health or environmental effect...and should carefully consider community views in developing mitigation strategies."</p> <p>EO 14096 states [federal agencies are] to "provide opportunities for the meaningful engagement of persons and communities with environmental justice concerns who are potentially affected by Federal activities including by providing timely opportunities for members of the public to share information or concerns and participate in decision-making processes, fully considering public input provided as part of decision-making processes, and providing notice of and engaging in outreach to communities or groups of people who are potentially affected and who are not regular participants in Federal decision-making."</p> <p>Given the above, EPA recommends:</p>	<p>Sound Transit and FTA have completed robust community engagement with property owners and residents that could be affected by the project, including those in Belmor. Engagement methods included online and in-person outreach, existing community efforts, media advertisements, English and translated materials (in Spanish, Korean, and Russian), and additional outreach efforts to ensure continual engagement and availability of information throughout Early Scoping, Scoping, 2021 SEPA Draft EIS publication, and 2023 NEPA Draft/SEPA Supplemental Draft EIS publication. Public input on proposed mitigation measures was solicited through the community engagement for the 2021 and 2023 Draft EIS publications. Additional information on this engagement is described in Appendix B, Public Involvement and Agency Coordination, of the Final EIS.</p> <p>An example of the meaningful engagement includes changes in the Preferred Alternative design to address comments from the 2021 Draft EIS. As part of the ongoing community and agency coordination, Sound Transit received comments from Federal Way on the 2021 Draft EIS identifying the need to replace 20th Avenue S and concerns from the community about ecosystem impacts of the project. In response to those comments, Sound Transit collaborated with city staff to modify the site design of the Preferred Alternative to replace 20th Avenue S with 18th Place S. Sound Transit also</p>

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
	<ul style="list-style-type: none"> Designing robust community engagement practices to maximize participation opportunities for communities that would be affected by the project, such as community-based workshops to facilitate discussion and issue resolution. Creating community advisory committees with representatives from impacted communities to help facilitate guidance and feedback from community members. Hosting focus group discussions to have robust conversations around mitigation that is appropriate to each impacted community. <p>EPA has concerns that while efforts have been made to inform the public, the public's feedback has not been fully incorporated into the decision-making process and/or addressed in the NEPA process. EPA recommends the Final EIS include more details on how input from impacted communities is considered in this process, including the selection of the preferred alternative, and ensure that public input is fully considered and responded too in the decision-making process.</p> <p>The CEQ EJ Guidance specifies that “[u]nder NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmental unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population.”</p>	<p>modified the design for the Preferred Alternative to allow for a wider stream corridor on the east side of the site, reduce wetland impacts on the west side of the site, and daylight additional stream segments. As the project moves into final design, Sound Transit will continue to engage with Federal Way and the community on design elements of the facility to address visual and community impacts.</p>
12	<p>Potential Impacts to Air Quality</p> <p>The DEIS states that, “[a]lthough portions of the Puget Sound region are in maintenance areas for PM_{2.5} and PM₁₀, none of the build alternatives are located within nonattainment or maintenance areas.” While this may be true, it is also possible that local air quality may still be impacted due to cumulative impacts from surrounding activities such as road construction and site operations, traffic on unpaved roads and others, including use of woodstoves, agriculture, fire, and air traffic. EJScreen indicates EJ indexes above the 90th percentile for diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index at all alternative locations, and above the 80th percentile for particulate matter at the preferred alternative location. This is consistent with the WA Health Disparities Map which ranks diesel exhaust PM_{2.5} emissions at a 9 out of 10 for all locations. Changes in climate may also result in increased air pollution from future wildfires. In our scoping comments for the project in August, EPA had also indicated that evaluation of cumulative impacts on air quality will be important because of this project site's proximity to the Tacoma PM_{2.5} maintenance area.</p>	<p>The cumulative impacts analysis for Air Quality in Chapter 4, Cumulative Effects Analysis of the Final EIS, concludes that, while there is a potential for construction schedules to overlap with other projects in the area, the temporary nature of air quality construction impacts and the use of standard construction best management practices make it unlikely that air quality standards would be exceeded. Section 3.8, Air Quality and Greenhouse Gas Emissions has been updated to include more detail about existing air quality conditions in the study area from the EJScreen and the Washington Environmental Health Disparities Map, as well as from Puget Sound Clean Air Authority (PSCAA) monitoring data. There are no anticipated cumulative impacts expected from the Tacoma PM_{2.5} maintenance area because it is over 2 miles south of the OMF South alternative project sites.</p> <p>Section 3.8, Air Quality and Greenhouse Gas Emissions, of the Final EIS has been revised to include a discussion of a fugitive dust plan, sensitive receptors near the project sites, and</p>

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
		estimated construction durations of each build alternative.
13	<p>Because of this project's potential air quality impacts, EPA recommends the Final EIS:</p> <ul style="list-style-type: none"> Estimate air emissions from all sources (e.g., stationary and mobile sources) for the analysis area; discuss the timeframe for release of these emissions; and determine whether the emissions will exceed National Ambient Air Quality Standards (NAAQS). For accurate air emission estimates, use the latest version of EPA's Motor Vehicle Emission Simulator (MOVES3). The DEIS does not currently provide baseline data on air quality to help determine the extent to which the project will impact air quality in the project area and vicinity. EPA recommends an assessment of baseline conditions be conducted and disclosed in the Final EIS, including a summary of representative background concentration of criteria air pollutants and any relevant information regarding local air toxics, if available. 	<p>Section 3.8, Air Quality and Greenhouse Gas Emissions, of the Final EIS has been revised to include more detail on the types of operational emissions that would be expected and their relative location on the sites. Through coordination with EPA Air Quality staff, EPA affirmed that a MOVES analysis for this project is not warranted because the number of daily trips generated by OMF South is relatively low.</p> <p>As stated in the Final EIS, the project alternatives are in areas that are in attainment for current NAAQS. While PM_{2.5} is a recognized concern throughout the PSCAA region, it is not on the verge of falling into nonattainment. Section 3.8, Air Quality and Greenhouse Gas Emissions, has been updated to include more detail about existing air quality conditions in the study area from the EJScreen and the Washington Environmental Health Disparities Map, as well as from PSCAA monitoring data. According to PSCAA air quality data, diesel emissions (measured as black carbon) have been trending downward, and PM_{2.5} levels have met standards, though wildfire smoke days have posed a concern in recent years.</p> <p>The Final EIS concludes that operational impacts to air quality would be very minor, and while construction-related impacts could affect air quality within localized areas of construction activity (including traffic congestion), those impacts could be avoided or reduced through the use of BMPs. Similarly, the cumulative impacts analysis did not identify any substantial adverse impacts, even with consideration of other construction projects in the vicinity of the site alternatives.</p> <p>In addition, Sound Transit has a robust community outreach program designed to keep the public informed of the project and a lead ombudsman to respond to and address community concerns and questions throughout construction.</p>
14	<ul style="list-style-type: none"> Expand the fugitive dust plan for the alternative project sites, particularly to identify nearby sensitive receptors and measures to protect these from dust impacts. Describe in the plan how the nearby public will be kept informed of the project and be provided contact methods to report fugitive dust impacts. 	<p>Avoidance and minimization measures have been updated in Section 3.8, Air Quality and Greenhouse Gas Emissions, to add specific measures that could be included in a fugitive dust plan. The contractor will be responsible for preparing and following a fugitive dust plan that will identify corrective actions to be taken if dust from the project site reaches unacceptable levels.</p>

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
15	<ul style="list-style-type: none"> Include a summary of the project-related Mobile Source Air Toxics analysis results using the most recent EPA model for analysis of these emissions and related health risks. If there will be significant air toxics emissions, consider giving preference to contractors using highest engine Tier available (Tier 3 or 4) machinery to reduce air toxics emissions during implementation of the project. During project site preparation, the DEIS indicates there will be up to 564 truck trips per day traveling to and from the project site. As this number does not account for the project construction and overall cumulative traffic in the area, it is possible that mobile source air toxics emissions from the project and other surrounding sources could be significant and warrant further analysis. Ensure the above analyses include off-site mobile source air emissions of vehicles and trucks along likely corridors to and from the facility from both the construction and operations of the project with respect to criteria air pollutants and air toxics, including diesel particulate matter emissions. Consider sensitive receptors and vulnerable populations such as communities with EJ concerns, park/recreational users, schools, daycares, seniors/nursing homes, hospitals, and other healthcare facilities. The air quality analysis does not currently include health-related risks associated with diesel exhaust emissions. Providing a diesel exhaust emissions analysis of the long-term increased truck traffic and its impact on the surrounding community will be helpful. 	OMF South does not meet the threshold for conducting a Mobile Source Air Toxics (MSAT) analysis. According to FHWA guidance, projects that should complete MSAT analysis include those that have potential for a meaningful difference in MSAT emissions, such as major intermodal freight facilities or projects that would add significant capacity to highways or roads with average annual daily traffic volumes of 140,000 to 150,000 vehicles per day. The OMF South project does not affect any roadways with such traffic volumes, nor would it add capacity to any highways or roads. Through coordination with EPA Air Quality staff, EPA affirmed that MSAT for this project is not warranted.
16	<ul style="list-style-type: none"> Identify appropriate mitigation measures and best management practices to reduce emissions and comply with federal and state air quality regulations. 	Section 3.8, Air Quality and Greenhouse Gas Emissions, of the Final EIS lists the avoidance and minimization measures, including best management practices to reduce emissions and comply with federal and state air quality regulations. With implementation and consistent use of BMPs to minimize on-site emissions, construction and operation of the proposed project would not be expected to substantially affect air quality, and therefore no mitigation is anticipated.
17	<ul style="list-style-type: none"> Discuss plans to monitor air quality in the project area and take corrective action if the NAAQS are not met. This is important because there are sensitive receptors in the project area and motor vehicle traffic may increase in the area, particularly during project construction. Localized air quality conditions can be substantial (e.g., during wildfire burns), even though area-wide and/or long-term emissions monitoring may show compliance with NAAQS. Consideration of the cumulative health impacts caused by the project (construction, operation, and maintenance phases) and other sources to communities with EJ concerns will also be important, as well as coordination with public health agencies and industry, which often have data on human health and environmental hazards. 	Section 3.8, Air Quality and Greenhouse Gas Emissions, of the Final EIS found no indication that constructing or operating OMF South would lead to NAAQS exceedances; therefore, no monitoring is proposed. The contractor will be responsible for preparing and following a fugitive dust plan that will identify corrective actions to be taken if dust from the project site reaches unacceptable levels.

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
18	<ul style="list-style-type: none"> Clarify whether the project analysis area is adjacent to the maintenance area for PM_{2.5} and discuss when the maintenance period will end or be renewed. If the site is adjacent to this maintenance area and a conformity determination analysis is conducted, then, provide results of such analysis in the Final EIS. It may also be prudent to monitor air locally and take corrective action if NAAQS are exceeded, even if temporarily. 	<p>The project alternatives are over 2 miles north of the PM_{2.5} maintenance area in Tacoma/Pierce County (the maintenance area ends at the county line), which will end in March 2035. Accordingly, FTA and Sound Transit determined that a conformity determination analysis is not required for the project, as described in Section 3.8, Air Quality and Greenhouse Gas Emissions, of the Final EIS.</p>
19	<ul style="list-style-type: none"> Provide information on coordination with other entities in the area, such as the State of Washington Departments of Ecology and Social and Health Services and local air organizations, to ensure emissions due to the proposed project are reduced and effectively mitigated throughout the proposed project lifespan. 	<p>The project did not consult with other agencies over air quality concerns because no air quality impacts were identified beyond short-term construction impacts that can be mitigated through BMPs.</p>
20	<p>Potential Impacts to Surface Water Quality and Beneficial Uses</p> <p>As construction and operation activities may impact water resources, resulting in alterations of local hydrology and long-term impacts to water quality parameters and designated beneficial uses due to increased turbidity and sedimentation of these pollutant receiving waters, EPA recommend that the Final EIS:</p> <ul style="list-style-type: none"> Include information on the most recent EPA-approved Water Quality Standards (WQS) for the State of Washington and implications for water quality protection within waterbodies in the analysis area and vicinity. It would be important for the public to know the State WQS to determine the extent to which the proposed action would impact water quality. The DEIS indicates that Build Alternatives will likely impact two already impaired tributaries on current Washington State's 303(d) list due to exceedances of copper, lead, polycyclic aromatic hydrocarbons (PAHs), pH, and zinc WQS within the West Fork Hylebos tributary; and bacteria, dissolved oxygen in McSorley Creek. Under the Preferred Alternative, there will also be a loss of riparian vegetation which may contribute to long-term impacts to water resources in the project area and downstream areas, including increased stream temperatures; decreased runoff interception and pollutant filtration functions; reduced groundwater recharge; increased erosion and sedimentation; and loss of stream channel stabilization. Discuss the project impacts analyses and conclusions based on the most recent WQS information. Where WQS are exceeded, it will be important for the FEIS to discuss how these impaired waterbodies will be restored. 	<p>The project will comply with current stormwater and water quality regulations in effect at the time of construction. As detailed in Section 3.11, Water Resources, these regulations concern stormwater flow control and treatment in order to protect receiving waterbodies. Section 3.11 lists the specific avoidance and minimization measures that the project would implement to protect water quality during construction and operation.</p> <p>Section 3.10, Ecosystems, details avoidance, minimization, and mitigation measures for impacts related to the removal of riparian vegetation. The EIS acknowledges that contamination can bypass stormwater treatment facilities in some instances and that Ecology has evaluated the effectiveness of stormwater facilities in providing treatment that prevents or reduces the toxicity of contaminants in receiving waters. Under any of the build alternatives, treatment effectiveness would be a key consideration in the selection and design of stormwater management facilities.</p> <p>The Final EIS was updated to include a list of regulations that govern the protection or use of water resources in the study area, including the most recent EPA-approved Water Quality Standards (WQS) for the State of Washington. See Appendix H5, Water Resources Technical Appendix. In 2022, EPA approved the 2018 water quality standards for Washington state, which are the most current standards. No WQS exceedances are anticipated as a result of the project.</p>
21	<ul style="list-style-type: none"> Provide the most current information regarding the status of the Clean Water Act § 401 certification and § 404 permit application processes, as well as conditions to protect water quality and wetlands. 	<p>The need for a Clean Water Act (CWA) Section 401 certification and 404 permit is listed in the Anticipated or Potential Licenses, Permits, and Approvals table in the Fact Sheet of the 2023 Draft EIS and Final EIS. Section 3.10, Ecosystems, and Section 3.11, Water Resources of the 2023 Draft</p>

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
		EIS and Final EIS discuss the need to protect water quality and wetlands. Actual permit conditions will be determined through the permit application processes with Ecology and the U.S. Army Corps of Engineers. No permit applications under the CWA have been made to date; these will occur after publication of the Final EIS and once the Sound Transit Board selects the project to be built.
22	<ul style="list-style-type: none"> Include up-to-date information on the anticipated Pollutant Discharge Elimination System (NPDES) permit application process including measures to protect water quality and development of Storm Water Pollution Prevention Plans, reporting, and monitoring. The DEIS indicates that project construction will disturb more than 1 acre of land (up to 68 acres), which will subject the project to NPDES permitting requirements for discharges to waters of the United States and related Stormwater Pollution Prevention Plan and construction best management practices. 	The need for a compliance review by the local jurisdiction of the NPDES stormwater discharge requirements before discharge to the local stormwater system is listed in the Anticipated or Potential Licenses, Permits, and Approvals table in the Fact Sheet of the 2023 Draft EIS and Final EIS. Section 3.11, Water Resources, of the 2023 Draft EIS and Final EIS lists the potential avoidance and minimization measures and BMPs that could be used during construction, including the development of a Stormwater Pollution Prevention Plan.
23	<ul style="list-style-type: none"> Consider implementation of low impact development techniques, which have the potential to further reduce stormwater volumes and thus mimic natural conditions as closely as possible. The techniques also lessen impacts of stormwater runoff from impervious surfaces such as paved roads, parking lots, and roofs and can provide energy and other utility savings. 	Low-impact development measures will be considered as part of final design and were discussed in the avoidance and minimization measures listed in Section 3.11, Water Resources, of the 2023 Draft EIS.
24	<ul style="list-style-type: none"> Describe plans to coordinate with the Washington State Department of Ecology and all affected tribes to assure that state and tribal water resources are protected from impacts associated with the proposed project's construction, operation, and maintenance activities. 	Appendix B, Public Involvement and Agency Coordination, of the Final EIS describes Sound Transit's coordination efforts with regulatory agencies and Tribal governments, including Ecology, throughout the course of the project. Sound Transit will continue coordinating with the Tribes and regulatory agencies throughout the final environmental review, permitting, design, and construction of the project.
25	The DEIS indicates that water quality may be adversely affected if the project construction activities (excavation, digging, bulldozing, surface pavement, earthwork and grading, stream relocation, etc.) alter the hydrology of springs and surface runoff such that erosion carries sediment to surface waters and pollutants to local drainages and the underlying aquifer. In addition, land disturbance, material storage, waste disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic can all affect recharge to the local aquifer and groundwater quality. The Build Alternatives may also result in unavoidable permanent direct, indirect, and temporary impacts to wetlands and their buffers.	See response to Comment ID 20.

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
26	<p>Potential Impacts on Contaminated Sites and Monitoring</p> <p>If the FTA and Sound Transit reconsider the Midway Landfill Alternative, EPA recommends FTA coordinate with EPA R10 Superfund Program as the project is implemented so that project activities are consistent with agreed upon remedies for the Midway Landfill Superfund site. The EPA Remedial Program Manager is Ashley Grompe, and she may be reached at (206) 553-1284 or grompe.ashley@epa.gov. It will also be helpful to coordinate with Washington State Department of Ecology so that the FEIS identifies all the contaminated sites in the planning area and vicinity and discusses measures to take to minimize project impacts and meet state requirements.</p>	<p>Section 3.13, Hazardous Materials, includes information on the contaminated sites in the planning area and vicinity and discusses measures to take to minimize project impacts and meet state requirements. If the Midway Landfill Alternative is selected as the project to be built, Sound Transit will coordinate with the EPA, Ecology, and other regulatory agencies as appropriate.</p>
27	<p>The DEIS identifies several existing contaminated sites in the project area (up to 64 sites), and the possibility that more contaminated sites could be discovered during construction and operation of the project. Identification of the sites was also limited to a 1/8-mile radius, which is less than the suggested 1-mile radius used for identification of contaminated sites.</p>	<p>The study area for the hazardous materials analysis included the area within a 1/8-mile radius of the construction limits for each build alternative because properties farther than 1/8-mile away present a low probability of having hazardous materials releases that could affect the study area. Please see Section 3.13, Hazardous Materials.</p>
28	<p>Potential Impacts to Biological Resources</p> <p>We recommend that the Final EIS include information on working with the U.S. Fish and Wildlife Service and National Marine Fisheries Service, and, as appropriate, with the Washington Department of Fish and Wildlife, including recommended measures to reduce risks and protect biota and habitat. The DEIS indicates the proposed project activities may impact federally and state protected species occurring in the project area and vicinity, such as the threatened Puget Sound Chinook salmon, Puget Sound steelhead, and bull trout. Because of their potential to support fish use, the East and West Fork Hylebos tributaries in the project area are also designated as essential fish habitat for Pacific salmon.</p> <p>The impacts to biological resources will be due to the anticipated loss and degradation of suitable habitats and cover; increased sediment delivery to streams, resulting in increased turbidity; and higher than optimal noise levels during project construction activities that will involve use of excavators and other heavy equipment or machinery. EPA also encourages the FTA to include in the FEIS information on the outcomes of consultations with the Services and coordination with the state agency.</p>	<p>Appendix B, Public Involvement and Agency Coordination, describes Sound Transit's coordination efforts with regulatory agencies and Tribal governments, including the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and the Washington Department of Fish and Wildlife (WDFW), throughout the course of the project. Sound Transit will continue coordinating with the Tribes and regulatory agencies throughout the final environmental review, permitting, design, and construction of the project.</p> <p>Section 3.10, Ecosystem Resources, of the Final EIS includes a discussion of Endangered Species Act (ESA)-listed species. Additionally, Sound Transit and FTA have prepared a Biological Assessment that evaluates potential impacts of the Preferred Alternative to federally listed species including listed fish. ESA consultation is currently underway with the National Marine Fisheries Service and U.S. Fish and Wildlife Service.</p>
29	<p>Coordination with Tribes</p> <p>EPA encourages FTA to incorporate feedback from Tribes when making decisions regarding the project and recommends the FEIS describe the issues raised during government-to-government consultations and how those issues were addressed.</p>	<p>Appendix B, Public Involvement and Agency Coordination, of the Final EIS describes Sound Transit's coordination efforts with regulatory agencies and Tribal governments throughout the course of the project. Sound Transit will continue coordinating with the Tribes and regulatory agencies throughout the final environmental review, permitting, design, and construction of the project.</p>

EPA (Communication ID 539079)		
Comment ID	Comment Text	Response
30	<p>Monitoring of the Project and Adaptive Management</p> <p>EPA recommends the FEIS include a monitoring program designed to assess both impacts from activities and effectiveness of mitigation measures for the impacts and indicate how the program will use an effective feedback mechanism, such as adaptive management, so that any needed adjustments can be made to the activities to meet environmental objectives during project implementation. For example, there could be a plan to monitor noise impacts during project construction and take corrective action if noise complaints or damage claims exceed existing levels.</p>	<p>The OMF South project requirements will require the contractor to conduct noise and vibration monitoring during construction to confirm noise levels are below FTA threshold values. Additionally, the contractor must conduct noise and vibration verification tests before revenue service can begin.</p> <p>Regulatory agencies may require monitoring as part of permit conditions. Sound Transit will comply with all permitting requirements.</p>
31	<p>Social Cost of Greenhouse Gases</p> <p>EPA acknowledges the DEIS quantifies the greenhouse gas emissions for operations, maintenance, and construction, including haul truck emissions, for the proposed alternatives. EPA continues to recommend the FEIS estimate the social cost of GHG emissions (SC-GHG) for each alternative to facilitate decisionmakers' and the public's evaluation of the proposed alternatives by monetizing the calculated GHG emissions. This is in alignment with CEQ's January 9, 2023 interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. This guidance was in response to EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. Alternatively, if choosing to not include SC-GHG in the analysis, provide a basis for that decision.</p>	<p>Section 3.8, Air Quality and Greenhouse Gas Emissions, of the Final EIS has been updated to include a discussion of the social cost of the greenhouse gases that could be emitted under each alternative.</p>

From: Handel, Lindsey (FHWA) <lindsey.handel@dot.gov>
Sent: Monday, October 30, 2023 9:13 AM
To: Green, Erin <erin.green@soundtransit.org>
Cc: Zweifel, Justin (FTA) <justin.zweifel@dot.gov>; Chris Moelter <cmoelter@anchoragea.com>; Borbe, Elma <elma.borbe@soundtransit.org>; Hawkins, Curvie <Curvie.Hawkins@soundtransit.org>; Neilson, Austin <Austin.Neilson@soundtransit.org>; Ramachandra, Sagar <sagar.ramachandra@soundtransit.org>; Maggioncalda, Daniel <daniel.maggioncalda@soundtransit.org>; Eskenazi, Zachary <Zachary.Eskenazi@soundtransit.org>; Love, Sharon (FHWA) <sharon.love@dot.gov>; Albury, Elisa (FHWA) <elisa.albury@dot.gov>; Young, Autumn (FHWA) <autumn.young@dot.gov>; Barnett, Joel (FHWA) <joel.barnett@dot.gov>; McKeon, Dianna (FHWA) <dianna.mckeon@dot.gov>; Callahan, Cindy (FHWA) <Cindy.Callahan@dot.gov>; Bridgers, Mystery (FHWA) <Mystery.Bridgers@dot.gov>; Rizzo, Ralph J (FHWA) <Ralph.J.Rizzo@dot.gov>; Roberson, Melinda (FHWA) <melinda.roberson@dot.gov>; Martindale, Gary (FHWA) <Gary.Martindale@dot.gov>
Subject: RE: Notice of Availability - Operations and Maintenance Facility South Draft EIS

Good Morning Erin,

Attached are the FHWA comments on the OMF South Draft EIS. We are also including two reference documents for a review comment on the Ecosystems section.

Let us know if you have any questions or need to meet to resolve our comments.

Thank you,

Lindsey L. Handel, P.E., Senior Level III FAC-P/PM
Urban Transportation Engineer
Federal Highway Administration
711 S. Capitol Way, Suite 501
Olympia, WA 98501-1284
Lindsey.Handel@dot.gov
360-753-9550

FHWA Comments on OMF-South Draft EIS October 2023					
Page	Section	Location	Table Row	Table Column	Comment
B-9	3.1	Appendix B			Are project updates via listserv provided in languages other than English? Is there an option for individuals to request updates in languages other than English? If so, which languages?
B-9	3.2	Appendix B			How are language access services provided during open house and drop-in sessions? Are multi-lingual staff present?
B-10	3.3	Appendix B			Were language services provided for virtual public hearings? If so, how were they provided? (Break-out sessions in multiple languages, etc.?) Was a sign language interpreter present?
B-11	3.6	Appendix B, 8th Bullet			Simple typo creates significant difference: Title VI (6), instead of Title IV (4)
B-11	3.6	Appendix B			<p>The project web page provides a Google translate feature at the bottom right hand corner of the home page where it blends with the rest of the page. It isn't highlighted or easily identified by bold color or font. This means LEP individuals must scan the entire, English-only, page before locating the translate option. Additionally, the "Select Language" drop-down feature is displayed exclusively in English, which means an LEP individual would have to be able to read English in order to identify that this feature offers translated languages. This is also the case for the "civil rights and complaints" link.</p> <p>How are LEP folks provided meaningful access to language services if they must navigate English-only language in order to identify where these services exist? Placing the "View in other languages" option at the top of the home page, in languages represented in the project area, would provide more meaningful LEP access. On the Title VI page, multiple languages are provided in the top right corner to guide LEP folks to information about the Title VI complaint process. How do LEP folks locate complaint information, in-language, on the home page?</p>
		Title VI Equity Analysis			<p>This appears to be exclusively a EJ analysis and not a Title VI analysis. It does not include all Title VI protected classes or analyze them individually. The analysis aggregates minority populations and includes low-income populations.</p> <p>EJ addresses distribution of high and adverse impacts on minority and low-income populations. EJ analytical standards also recommend aggregating minority populations.</p> <p>Title VI ensures nondiscrimination in programs and activities on the basis of race, color, and national origin (all races, all colors, all national origins) and does not consider low-income. Title VI analytical standards recommend each population be analyzed individually.</p> <p>The Minority Population Distribution maps look at the density of the aggregated minority population but does not evaluate if there is a specific community (race, color, national origin) present that may be disparately impacted.</p>

FHWA Comments on OMF-South Draft EIS October 2023					
Page	Section	Location	Table Row	Table Column	Comment
4-1	4.1	General Outreach, last paragraph			Indicates "translation assistance" was available during online hearings. Was this oral interpretation or written translation services? If it was translation (written) how was this accommodated in the virtual space? Were there break-out rooms offering translated captioning?
4-2	4.2	Targeted Outreach, 1st bullet			Were in-language lunch groups provided oral-interpretation services or written translation services? May want to make a distinction between what type of services were provided.
4-2	4.2	Targeted Outreach, 2nd bullet			Were translation (written) or interpretation (oral) services provided for open houses?
G1-69	4.2.1.1	TTR			No information was provided regarding increases in freight traffic. If this is captured in the passenger car equivalents, please document that in the text.
		TTR			No discussion of heavy vehicle traffic increases and impacts.
G1-44	3.7				I recommend using fatal and serious crash rates rather than collision rates. Regardless of the pandemic, K and A crashes have increased while total reported crashes have decreased. This assessment should assess what risks are being elevated due to the increases in traffic, both in aggregate and by type.
G1-44	3.7				The traffic safety changes experienced in 2020-2022 are realistic and should not be excluded. Exposure is accounted for by normalizing by VMT and EV. Traffic behavior has changed since 2018 and should be accounted for in decision-making.
		Ecosystems			Essential Fish Habitat should be capitalized throughout.
		Ecosystems			2 nd paragraph where study area extent defined, the 300' extent for pollutants isn't really consistent with conclusions in second paragraph of 3.10-13 where downstream adverse effects are acknowledged.
3.10-13		Ecosystems			For the discussion on 6PPD-quinone where coho pre-spawn mortality is mentioned, consider expanding to include more recent science on mortality to other salmonids and trout including steelhead, Chinook salmon and rainbow trout (scientific sources provided).
3.11-17		Water Resources			Pg. 3.11-17: States that enhanced treatment for all post-project GIS will be provided. Does this include existing and replaced PGIS?
		Water Resources			Table 3.11-10 shows either a net reduction or no increase in PGIS for the Preferred Alternative but later in the section (3.11.2.2) it states that OMF S. would add PGIS and non-PGIS.

FHWA Comments on OMF-South Draft EIS October 2023					
Page	Section	Location	Table Row	Table Column	Comment
	3.11.3	Water Resources			The Potential Mitigation (3.11.3) section states that no temporary or long-term adverse impacts on water resources are expected after treatment BMPs are constructed, however in the Ecosystems section, adverse effects downstream are acknowledged. I think it is valid to state that no further mitigation is likely to be required and explain that some adverse effects may occur due to the very low concentrations of some pollutants that are still deemed toxic to some fish species and the fact that even “effective” treatment won’t prevent some discharges from the BMPs that may be above those thresholds.
ES-v		Fact Sheet			There are two separate approval actions for FHWA and they should be called out separately on this list. There is an NEPA Record of Decision, Federal Highway Administration and the Air Space Lease for Use of Interstate Right of Way, Federal Highway Administration.
ES-v		Fact Sheet			FHWA wants to confirm there are no anticipated design approvals or modifications to Interstate 5 with this project, which would require FHWA approval.
3.6.3.1		Environmental Justice			The last paragraph in 3.6.3.1 indicates that EJ populations would accrue benefits through “the addition of new jobs to build the project.” Given the way contractors are selected, there is no way to definitively say the jobs will be given to people in the vicinity of the project. Even with more lenient local hiring rules now, there is no guarantee and we would be more comfortable if this statement was left out—or include a caveat to the statement to explain that it is not a guarantee. Even though it should be obvious given the context, there should be an explanation that the benefits in the last paragraph of this section are all temporary benefits that would occur during construction. If there would be any kind of increased staffing in the area because of the maintenance facility, that could be added as a more permanent benefit related to the economic factors mentioned in this paragraph.
		Environmental Justice			Please include the following (adding FTA if you deem appropriate): "An Executive Order (E.O.) 14096—Revitalizing Our Nation’s Commitment to Environmental Justice for All has been recently enacted (April 21, 2023). The new E.O. 14096 on environmental justice does not rescind EO 12898, which FHWA is implementing through the current DOT and FHWA EJ Orders (DOT 5610.2C and FHWA 6640.23A) until further guidance is provided regarding the implementation of the new E.O. on environmental justice."
	Ch 2				It is difficult from any figure to see where the alternatives would intersect the interstate ROW and cross the access line. Does there need to be a figure with that?
31	3.9.1				It was not stated in the noise analysis specifically but it may be helpful to the reader and existing residents that the reason why there are so few noise impacts from the new mainline extension and test track to the north is because properties will be acquired for the facility, thus there will be some distance between sensitive receptors and the track. This is not exactly clear as there is no map in the technical report that includes model receptor locations.

FHWA Comments on OMF-South Draft EIS October 2023					
Page	Section	Location	Table Row	Table Column	Comment
37	3.9.2.2	Table 3.9-2 and 3.9-3			It is confusing to the reader that existing noise levels in both tables (specifically S 324th Street to Burning Tree Blvd) do not match. Checking this against tables G2.6-10 and G2.6-11 it looks like the difference is between NB and SB locations. Consider adding the track side column to Table 3.9-2 and 3.9-3.
44	3.9.3.1	First paragraph			"Sound Transit would replace noise walls and berms that would be removed as part of the Preferred And South 344th Street alternatives." State that this would specifically occur on I-5.
	Ch 2				It is difficult from any figure to see where the alternatives would intersect the interstate ROW and cross the access line. Does there need to be a figure with that?
31	3.9.1	Noise			It was not stated in the noise analysis specifically but it may be helpful to the reader and existing residents that the reason why there are so few noise impacts from the new mainline extension and test track to the north is because properties will be acquired for the facility, thus there will be some distance between sensitive receptors and the track. This is not exactly clear as there is no map in the technical report that includes model receptor locations.
37	3.9.2.2	Noise/ Table 3.9-2 and 3.9-3			It is confusing to the reader that existing noise levels in both tables (specifically S 324th Street to Burning Tree Blvd) do not match. Checking this against tables G2.6-10 and G2.6-11 it looks like the difference is between NB and SB locations. Consider adding the track side column to Table 3.9-2 and 3.9-3.
44	3.9.3.1	(Noise) First paragraph			"Sound Transit would replace noise walls and berms that would be removed as part of the Preferred And South 344th Street alternatives." State that this would specifically occur on I-5.
3.3 Acquisitions, Displacements, and Relocations					
3.3	General	General			Missing discussion that relocation resources are available to all people being relocated without discrimination in compliance with Sound Transit's Limited English Proficiency Plan.
3.3-1	3.3	Title			Displacement and relocation really mean the same thing. Displaced person is defined as any person who moves from the real property or moves his or her personal property from the real property. Relocation is provided to displaced persons. This section should really be titled Property Acquisitions and Displacements.
3.3-1	3.3	Entire Section	Includes Notes section under tables		This is really an FTA call however, if this were a WSDOT project, according to WSDOT's ROW manual, environmental reports at this level should not include parcel specific information such as names and possible addresses of potential displacements. This information, if collected, should be kept in a separate project file. The statements should be more general. Instead of calling out Belmor Mobile Home Park, just say mobile home park, GarageTown to storage units, etc..
3.3-5	3.3.3	Title			I wouldn't refer to this section as "Relocation Opportunities". The section is really talking about property availability for displacements so I would suggest using that title.
3.3-5	3.3.3	1st paragraph			Suggest changing "relocation opportunities" to "available properties".

FHWA Comments on OMF-South Draft EIS October 2023					
Page	Section	Location	Table Row	Table Column	Comment
3.3-6	3.3.3	Table 3.3-3	Notes (2)		Since CoStar does not collect data on availability for potential replacement sites for religious facilities, what other data collection did you explore, e.g. real estate broker in the local market?
3.3-6	3.3.3	3.3.3.1			This section states that finding properties that have specific needs may be more difficult to find. Missing a discussion of the actions proposed to remedy insufficient replacement sites.
3.3-6	3.3.3	3.3.3.2 - Title			Title of section is "Single-Family Residential" and according the Table 3.3-1 under notes residential displacements include individual apartment/condo units and mobile homes. Based on this "Multi-Family should be added to the title.
3.3-6	3.3.3	3.3.3.2			Suggest changing the sentence from saying displaced residents may have to find a location in a different neighborhood to "a similar neighborhood". A comp from either the same neighborhood or similar neighborhood considered in the same market must be provided to the displaced person before the agency can require them to relocate. Also, mobile home displacements can be challenging as inventory is at an all time low. This section is missing a discussion of the actions proposed to remedy insufficient replacement sites, including housing of last resort.
3.3-6	3.3.3	3.3.3.3			The first sentence is contradictory as prior sections stated that finding properties with unique characteristics, such has a religious facility, could be more challenging. Also, in the case of the Church on 25 acres, it can be difficult to relocate due to its size. Missing a discussion of the actions proposed to remedy insufficient replacement sites.
3.3-7	3.3.4	1st paragraph			Suggest changing "relocation opportunities" to "available properties".
3.3-7	3.3.4	2nd paragraph			Not sure if Sound Transit's procedures allow for the use of a waiver valuation but, if they are going to use a waiver valuation for the TCEs or any other right that fits the criteria then they will want to add waiver valuation discussion to this section.
3.3-7	3.3.4	3rd paragraph			2nd sentence needs to be changed as it states in addition to compensating owners which can provide the appearance that the additional compensation is only for owners. Since this sentence deals with relocation expenses it should be revised to state other forms of compensation for displacements could include..... Would also suggest changing "support services" to "advisory services"
3.3-7	3.3.4	4th paragraph			Typically the property owner will approach the agency to request a hardship acquisition and that has a defined process. An agency can also acquire early when they have the legal right to do so. You might revise to state Sound Transit, with FTA's approval is considering early acquisition of the four parcels associated with the church parcel, and it could potentially be acquired as a hardship acquisition if the church makes the request and provides the necessary documentation.

FHWA Comments on OMF-South Draft EIS October 2023					
Page	Section	Location	Table Row	Table Column	Comment
3.3-8	3.3.4	1st paragraph			This statement is incorrect and should be revised to include all displacements. I would suggest removing "Businesses and tenants" to "Displaced persons" since all (business, farm, NPO, PPO, and residential) are included as defined.
3.3-9	3.3.5	1st paragraph			Advisory services are applicable to more than just property owners. Sentence should be revised - suggest just removing "to property owners".
3.4 Land Use					
3.4.1	3.4	Entire Section			This is really an FTA call however, if this were a WSDOT project, according to WSDOT's ROW manual, environmental reports at this level should not include parcel specific information such as names and possible addresses of potential displacements. This information, if collected, should be kept in a separate project file. The statements should be more general. Instead of calling out Belmor Mobile Home Park, just say mobile home park, GarageTown to storage units, etc..
3.5 Economics					
3.5-1	3.5	Entire Section			This is really an FTA call however, if this were a WSDOT project, according to WSDOT's ROW manual, environmental reports at this level should not include parcel specific information such as names and possible addresses of potential displacements. This information, if collected, should be kept in a separate project file. The statements should be more general. Instead of calling out Belmor Mobile Home Park, just say mobile home park, GarageTown to storage units, etc..
3.5-7	3.5.2.2	Last paragraph			Suggest changing "subsitute" to "suitable" to be consistent with the other areas you reference suitable for business sites.
3.6 Social Resources, Community Facilities, and Neighborhoods					
3.6-8	3.6	Entire Section			This is really an FTA call however, if this were a WSDOT project, according to WSDOT's ROW manual, environmental reports at this level should not include parcel specific information such as names and possible addresses of potential displacements. This information, if collected, should be kept in a separate project file. The statements should be more general. Instead of calling out Belmor Mobile Home Park, just say mobile home park, GarageTown to storage units, etc..
3.6-8	3.6	Preferred Alternative - 2nd paragraph			Suggest referring reader to the Acquisition and Displacements section for discussion on the difficulties associated with relocating a church.

Acute Toxicity of the Tire Rubber-Derived Chemical 6PPD-quinone to Four Fishes of Commercial, Cultural, and Ecological Importance

Markus Brinkmann, David Montgomery, Summer Selinger, Justin G. P. Miller, Eric Stock, Alper James Alcaraz, Jonathan K. Challis, Lynn Weber, David Janz, Markus Hecker,* and Steve Wiseman



Cite This: <https://doi.org/10.1021/acs.estlett.2c00050>



Read Online

ACCESS |



Metrics & More

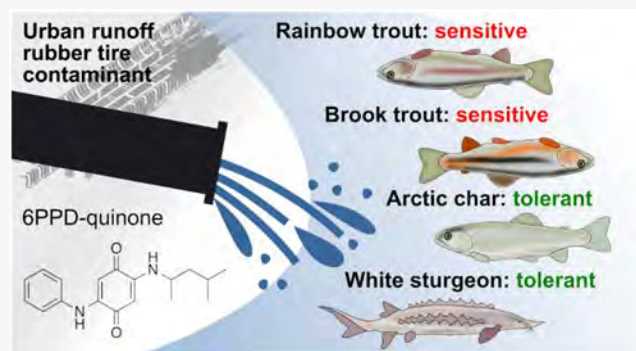


Article Recommendations



Supporting Information

ABSTRACT: *N*-(1,3-Dimethylbutyl)-*N'*-phenyl-*p*-phenylenediamine-quinone (6PPD-quinone), a transformation product of the rubber tire antioxidant 6PPD, has recently been identified as the chemical responsible for urban runoff mortality syndrome in coho salmon, with a median lethal concentration (LC_{50}) of $<0.1 \mu\text{g/L}$. Subsequent studies have failed to confirm comparable sensitivity in other fish species. Here, we investigated the acute toxicity of 6PPD-quinone to rainbow trout, brook trout, Arctic char, and white sturgeon. Fish were exposed under static renewal conditions, and exposure concentrations were verified analytically. Mortalities in brook trout occurred between 1.2 and 20 h, while mortalities began after 7 h and spanned 60 h in rainbow trout. The LC_{50} s in brook trout (24 h) and rainbow trout (72 h) were 0.59 and $1.00 \mu\text{g/L}$, respectively. Both species showed characteristic symptoms (increased ventilation, gasping, spiraling, and loss of equilibrium) shortly before death. No mortalities were observed after exposure of either char or sturgeon for 96 h at measured concentrations as high as $14.2 \mu\text{g/L}$. This is the first study to demonstrate the acute toxicity of 6PPD-quinone to other fishes of commercial, cultural, and ecological importance at environmentally relevant concentrations and provides urgently needed information for environmental risk assessments of this contaminant of emerging concern.



INTRODUCTION

Stormwater runoff from urban landscapes has long been a cause for environmental concern due to its chemical complexity, toxicity to aquatic organisms, and temporal and spatial dynamics.¹ In addition to road salt, organic contaminants from vehicle emissions and leakage, and toxic metals from brake pad abrasion,² tire wear particles (TWP)s have recently become the focus of scientific and public interest.³ Earlier research into the causes of fish kills following rainfall events along the west coast of the United States, termed coho salmon (*Oncorhynchus kisutch*) urban runoff mortality syndrome (URMS), suggested that rubber tire-derived chemicals might be responsible for this effect because they co-occurred with these mortality events.⁴ In a landmark study, Tian et al.⁵ applied a combination of fractionation, chemical analysis, and biological testing to pinpoint the causative chemical. The authors found that *N*-(1,3-dimethylbutyl)-*N'*-phenyl-*p*-phenylenediamine-quinone (6PPD-quinone) was generated through the environmental oxidation of the common rubber tire antidegradant 6PPD and can cause lethality in coho salmon at a median lethal concentration (LC_{50}) of $<0.8 \mu\text{g/L}$. Using a commercial standard, a revised LC_{50} in coho salmon of $<0.10 \mu\text{g/L}$ was reported in a follow-up study.⁶ Tian et al.^{5,6} and subsequent studies have

demonstrated the widespread occurrence of 6PPD-quinone in stormwater runoff and surface waters at concentrations of $\leq 19 \mu\text{g/L}$,^{7,8} indicating that 6PPD-quinone exposure poses an immediate risk to coho salmon populations. However, it was unknown whether exposure to this pollutant would also affect other aquatic species.

Two follow-up studies have determined the acute toxicity of 6PPD-quinone to a variety of species, including fish (zebrafish, *Danio rerio*; Japanese medaka, *Oryzias latipes*) and invertebrates (*Daphnia magna* and *Hyalella azteca*).^{9,10} All tested species were significantly less sensitive than coho salmon: exposure to 6PPD-quinone did not cause lethality in any of the four species studied by Hiki et al.¹⁰ up to concentrations as high as the maximum water solubility, which the authors estimated to range between 34 and $54 \mu\text{g/L}$. Varshney et al.⁹ observed an LC_{50} of $309 \mu\text{g/L}$ for zebrafish larvae when ethanol was used as the solvent vehicle. Because of the

Received: January 19, 2022

Revised: February 11, 2022

Accepted: February 14, 2022

alarmingly high sensitivity of coho salmon to 6PPD-quinone, environmental risk assessors urgently require data on the acute toxicity of 6PPD-quinone across a greater diversity of fish species, with an emphasis on additional salmonid species.

This study investigated the acute toxicity of 6PPD-quinone across four species of commercial, cultural, and ecological importance to North America: rainbow trout (*Oncorhynchus mykiss*), brook trout (*Salvelinus fontinalis*), Arctic char (*Salvelinus alpinus*), and white sturgeon (*Acipenser transmontanus*). Additionally, rainbow trout are an important model fish species used in chemical risk assessment across many jurisdictions.^{11,12} This research provides important information for the environmental risk assessment of urban runoff and has the potential to inform regulatory controls of the use of 6PPD in rubber tires.

MATERIALS AND METHODS

Chemicals and Reagents. Native and mass-labeled (d_3) 6PPD-quinone were purchased from Toronto Research Chemicals (Toronto, ON). Stock solutions for exposure of fish to 6PPD-quinone were prepared using dimethyl sulfoxide (DMSO) to achieve a final solvent concentration of 0.01% (v/v) during exposures. Analytical standard solutions of native and mass-labeled 6PPD-quinone were prepared in HPLC-grade methanol.

Fish Source and Culture. Brook trout were from Allison Creek Trout Hatchery (Coleman, AB), were ~ 1 year old, were 17.1 ± 1.1 cm in length, and weighed 52.8 ± 7.6 g. Fish were housed in the Aquatic Research Facility (ARF) at the University of Lethbridge and acclimated in 150 L inert glass-fiber Krescel tanks (four fish per tank, 30% daily water renewal) for 2 weeks prior to exposures. Fish were fed a commercial salmonid feed at a daily rate of 1% of body weight during acclimation. Studies were approved by the University of Lethbridge Animal Welfare Committee (Protocol 2111).

Rainbow trout (from Lyndon Hatcheries, New Dundee, ON), Arctic char (from Miracle Springs Inc., North Vancouver, BC), and white sturgeon (wild fish spawned at the Nechako White Sturgeon Conservation Centre, Vanderhoof, BC) were from in-house cultures raised from embryos in the Aquatic Toxicology Research Facility (ATRF) at the University of Saskatchewan. Fish were cultured under flow-through conditions in facility water until they reached the juvenile stage (rainbow trout, ~ 2 years, 19.6 ± 1.9 cm, 97.5 ± 28.9 g; Arctic char, ~ 3 years, 13.8 ± 1.7 cm, 28.3 ± 9.8 g; white sturgeon, ~ 4.5 years, 42.4 ± 4.5 cm, 462.3 ± 159.3 g) and fed with a commercial fish feed at a daily rate of 1% of body weight during acclimation. Even though fish were somewhat larger than recommended according to various guidelines for acute toxicity tests, all fish were sub-adult and the larger size was selected due to availability considerations and to provide sufficient tissues for downstream analyses. Experiments were approved by the University of Saskatchewan Animal Care Committee (Protocol 20070049). A Species at Risk Act (SARA) permit for culture of and experimentation with white sturgeon was obtained from the Department of Fisheries and Oceans Canada (Permit 20-PPAC-00026).

Exposure Experiments. Pilot studies were conducted for each species to establish upper concentration bounds for acute lethality studies. For brook trout, fish were fasted for 24 h, moved to aerated 45 L rectangular glass tanks (two fish per tank) at 10 °C, and exposed for 24 h to nominal concentrations of 0, 0.02, 0.2, 2, or 20 $\mu\text{g/L}$ 6PPD-quinone

under static conditions (10 fish total). For the other species, two fish per species were each exposed under static conditions in individual tanks at either 6 or 20 $\mu\text{g/L}$ (two fish total per species). Brook trout and rainbow trout became moribund at 2 and 6 $\mu\text{g/L}$, respectively, within 4 h of the onset of exposure. Arctic char and white sturgeon did not show any response to concentrations as high as 20 $\mu\text{g/L}$ within 96 h.

Accordingly, in the main experiment, brook trout and rainbow trout were exposed to nominal concentrations of 6PPD-quinone ranging from 0.1 to 6 $\mu\text{g/L}$ (see Table S1 for details). Tanks were cleaned with a series of detergents, disinfectants, and/or ethanol, carefully rinsed, and left to dry before experiments. Due to their lower sensitivity, Arctic char and white sturgeon were exposed to only one nominal concentration (20 $\mu\text{g/L}$) that could be achieved using the limited amount of chemical available and that was nearing water solubility, while still being environmentally relevant.^{5,7,8}

Exposures of brook trout were performed in 150 L inert glass-fiber Krescel tanks at 10 ± 1 °C for 24 h (two replicate tanks with four fish each; two controls at five concentrations, 56 fish total). A shorter exposure period was chosen for brook trout due to a much faster onset of symptoms compared to rainbow trout. Test solutions were continuously aerated, recirculated, and temperature controlled. Rainbow trout, white sturgeon, and Arctic char were exposed in 700 L glass-fiber Min-o-Cool tanks containing 500, 500, and 300 L of test solution, respectively, at 12 ± 1 °C for 96 h under static renewal conditions. Water was exchanged at 40–60% (white sturgeon) or 75% (rainbow trout and Arctic char) daily (two replicate tanks and one extra control replicate with five fish each for rainbow trout, 65 fish total; two replicate tanks with five fish each for Arctic char, 20 fish total; three replicate tanks with two fish each for white sturgeon, 12 fish total). Control tanks were dosed with the DMSO solvent vehicle at the same level as all other tanks [0.01% (v/v)]. Average (\pm SD) water quality parameters were as follows for brook trout: temperature, 10.3 ± 0.7 °C; pH, 6.74 ± 0.13 ; DO, $99.8 \pm 11.5\%$; ammonia, 0.13 ± 0.11 mg/L; hardness, 131 ± 2.33 mg/L. Average (\pm SD) water quality parameters were as follows for other species: temperature, 12.8 ± 0.8 °C; pH, 8.35 ± 0.45 ; DO, $92.8 \pm 13.2\%$; ammonia, 0.14 ± 0.15 mg/L; hardness, 132 ± 6.80 mg/L. Water samples were collected for analytical confirmation of concentrations of 6PPD-quinone ~ 1 h after the initial dosing of tanks, which occurred after acclimation of fish for 48–96 h. For rainbow trout, Arctic char, and white sturgeon, a water sample was also taken every 24 h prior to water changes or after most fish in a tank became moribund. Samples were immediately spiked at 50 $\mu\text{g/L}$ with 6PPD-quinone- d_3 and stored at -20 °C until they were analyzed. Fish were observed during most of the exposure duration, immediately removed once they became moribund, and humanely euthanized using >250 mg/L buffered MS-222. Characteristic signs of 6PPD-quinone exposure leading to brook trout and rainbow trout becoming moribund (increased ventilation rate, gasping on the water surface, permanent loss of equilibrium, and spiraling motion) were observed during regular tank inspections and noted and would have resulted in death within 0.5 h if fish were not euthanized.

Biological Sampling. The fork length (millimeters) and weight (grams) of each fish were determined after euthanasia. Blood samples were obtained from the caudal vein using heparinized syringes, and blood glucose concentrations determined using hand-held meters (brook trout, OneTouch

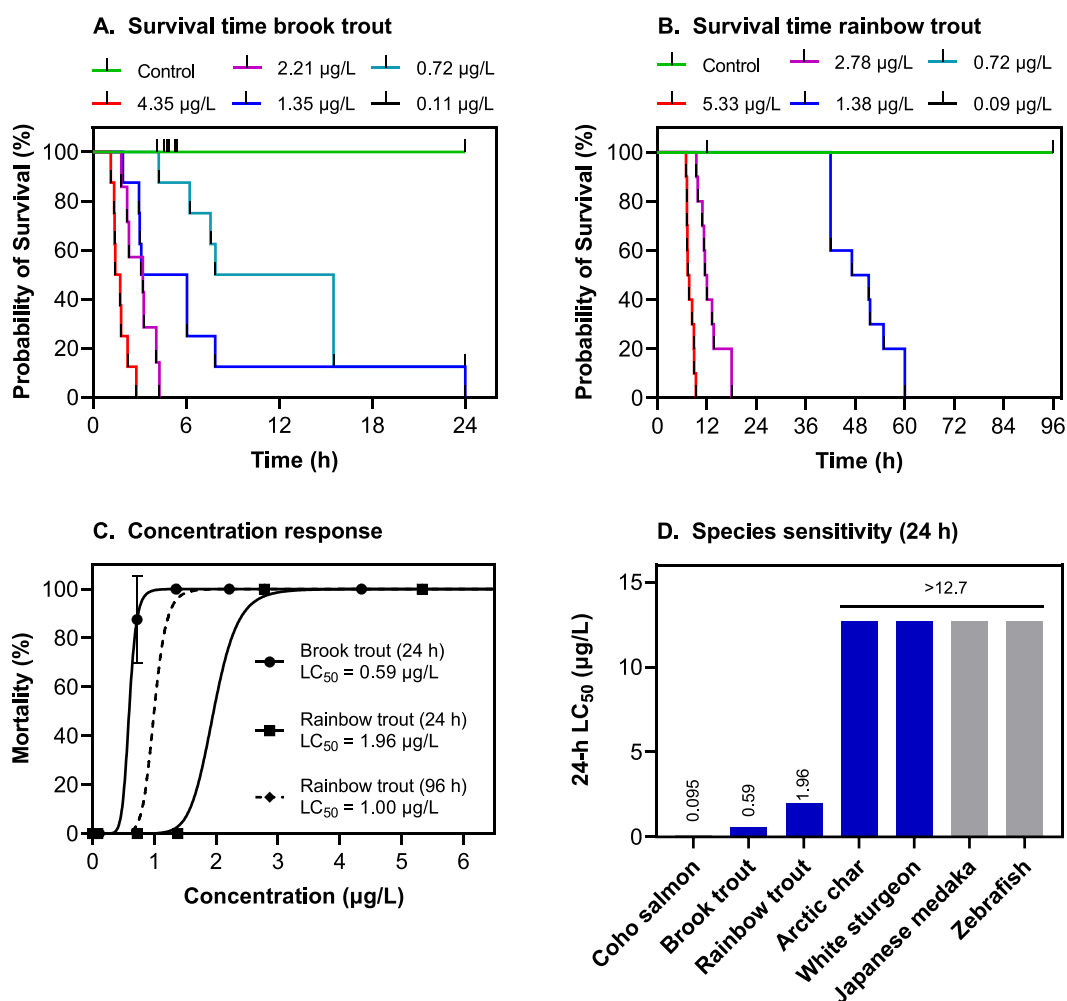


Figure 1. Relationships among exposure time, exposure concentration, and survival in (A) brook trout and (B) rainbow trout over exposure durations of 24 and 96 h, respectively. Median lethal concentrations at 24 and 96 h of exposure were interpolated for both species using (C) two-parameter logistic regression and (D) compared with those of other previously studied species. All concentrations are based on measured concentrations.^{6,9,10} Blue bars in panel D are from this study, while values for coho salmon, Japanese medaka, and zebrafish have been previously published.

Ultra 2 m, LifeScan, Malvern, PA; all other species, Contour Next meter, Ascensia, Basel, Switzerland). The percent hematocrit was determined in brook trout using a StatSpin CritSpin microhematocrit centrifuge (StatSpin, Norwood, MA).

Analytical Chemistry. Instrumental verification of exposure concentrations of 6PPD-quinone followed the method outlined by Challis et al.⁷ with modifications. Briefly, samples were analyzed on a Vanquish UHPLC instrument coupled with a Q-Exactive HF Quadrupole-Orbitrap hybrid mass spectrometer (Thermo-Fisher). An isotope dilution strategy using 6PPD-quinone- d_5 was applied for quantification. Average measured exposure concentrations were calculated and used for subsequent data analysis instead of nominal exposure concentrations. A detailed description of the analytical methods is provided in the [Supporting Information](#).

Data Analysis and Statistics. The percent mortality for each concentration and replicate was calculated at 24 h for brook trout and at 24 and 96 h for rainbow trout to account for differences in time to death between both species. LC_{50} s were interpolated for each time point using logistic regression of the percent mortality versus average measured exposure concentrations. Blood glucose measurements were analyzed for

normality and heteroscedasticity using Kolmogorov–Smirnov’s test and Levene’s test, respectively. Because the data sets violated the assumptions for one-way analysis of variance (ANOVA), a nonparametric Kruskal–Wallis’s test with Dunn’s post hoc test was performed. A p value of ≤ 0.05 was considered indicative of statistically significant differences. All plots were created and statistically analyzed using Prism 9 (GraphPad, La Jolla, CA).

RESULTS AND DISCUSSION

Analytical Verification of Exposure Concentrations.

Average concentrations of 6PPD-quinone measured over the exposure periods deviated $<16\%$ from nominal values across all species with the exception of the low-treatment groups for brook trout and rainbow trout (Table S1). There was an average loss of 14% (1.7% and 32% in the high- and low-treatment groups, respectively) of the test chemical over the 24 h window between water changes, suggesting exposure levels were stable throughout the experiments. Losses were slightly greater at the higher exposure concentrations used for Arctic char and white sturgeon. Hiki et al.¹⁰ reported a 17–73% decrease in 6PPD-quinone concentrations over 48 h between water changes for zebrafish and medaka, confirming the

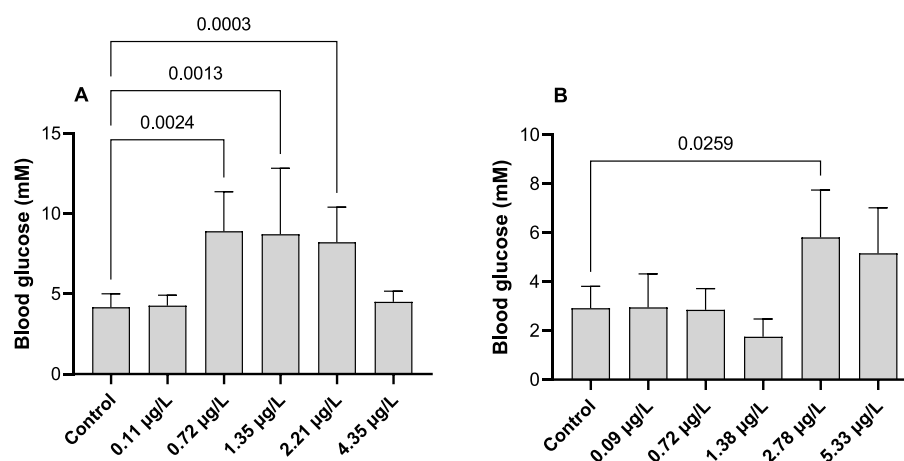


Figure 2. Blood glucose concentrations in (A) brook trout and (B) rainbow trout in moribund animals and those that survived until termination of the experiment following exposure to graded nominal concentrations of 6PPD-quinone. Bars depict the mean, and error bars the standard deviation of 4–15 fish per treatment and species, rather than tank replicates. Because control fish taken down at different sampling times did not differ significantly, individuals were pooled in a single control group for this analysis. Concentrations are based on measured exposure concentrations. Numbers above the brackets indicate the *p* value of statistical comparisons of blood glucose concentrations in 6PPD-quinone-exposed fish with those of the control group (Kruskal–Wallis ANOVA on ranks with Dunn’s post hoc test).

relative stability of this chemical under static renewal conditions.

Acute Toxicity of 6PPD-quinone in Fish. Exposure to 6PPD-quinone resulted in significant acute effects in two of the four tested species, which varied as a function of chemical concentration, exposure time, and species (Figure 1). Brook trout were most sensitive with 100% of mortalities in the high-treatment group occurring within 3 h of exposure and a 24 h LC_{50} of 0.59 µg/L [95% confidence interval (CI) of 0.48–0.63 µg/L], which is similar to previous observations in coho salmon.⁵ A slightly greater LC_{50} of 1.00 µg/L (95% CI of 0.95–1.05 µg/L) was recorded for rainbow trout after 72–96 h (1.96 µg/L after 24 h, 95% CI of 1.86–2.06 µg/L), while no mortalities were observed for either Arctic char or white sturgeon at measured concentrations as high as 14.2 and 12.7 µg/L after 96 h. Interestingly, in rainbow trout, the first signs of morbidity did not manifest until 7 h after commencing exposures and maximum mortalities occurred at 60 h, which was significantly longer than the times for brook trout and coho salmon.⁵ The LC_{50} values reported here for brook trout (0.59 µg/L) and rainbow trout (1.00 µg/L) were ~6–10-fold greater than that of coho salmon (0.10 µg/L) and are well within ranges of environmental concentrations of 6PPD-quinone previously reported in Canadian and U.S. surface waters after stormwater runoff events.^{5–8} While no mortality of endangered white sturgeon or Arctic char was observed after exposure to 6PPD-quinone, potential subchronic or chronic impacts have not been fully studied and cannot be excluded at this time.

These results support earlier reports that identified marked differences in the sensitivity of fishes to exposure with 6PPD-quinone and TWP leachates.^{3,5,10} Previous studies have hypothesized that sensitivity to 6PPD-quinone may be unique to salmonids.⁹ These authors, who assessed the acute toxicity of this chemical to Japanese medaka and zebrafish, did not observe any significant mortalities up to the limit of the water solubility of 6PPD-quinone, which was estimated to range between 34 and 54 µg/L. While this is in accordance with the lack of effects reported in white sturgeon in this study, our results for Arctic char as well as those reported for TWP

leachates by McIntyre et al.^{3,5} for chum salmon (*Oncorhynchus keta*) clearly demonstrate the tolerance of these two salmonid species. Thus, we can conclude that sensitivity to acute exposure with 6PPD-quinone is highly variable among fishes in general, and salmonids specifically, even among species from the same genus such as brook trout and Arctic char representing the genus *Salvelinus*, and rainbow trout, chum salmon, and coho salmon representing the genus *Oncorhynchus*.

In cases in which mortalities occurred, both brook trout and rainbow trout exhibited behaviors consistent with those observed in coho salmon,^{3,5} including hovering close to the water surface, accelerated opercular movements, gasping, and spiraling motion. This is in accordance with the hypothesis by McIntyre et al.³ and Varshney et al.⁹ that these types of behavior are suggestive of 6PPD-quinone causing cardio-respiratory distress. A significant increase in blood glucose concentrations observed at 0.72–2.21 µg/L in brook trout and 2.78 µg/L in rainbow trout (Figure 2) indicates that 6PPD-quinone impacted energy metabolism, although the underlying mechanisms for this increase are currently unclear. Additionally, hematocrit of brook trout exposed to 0.72–4.35 µg/L 6PPD-quinone significantly increased from an average of 42% in the control group to 68% at 4.35 µg/L (Figure S4). This agrees with observations by Blair et al.,¹³ who found even more pronounced increases in hematocrit in coho salmon following exposure to urban runoff. The authors also provided evidence of the disruption of the blood–brain barrier in exposed fish, which might be one of the reasons for the observed increases in hematocrit. However, it is currently unclear if this is the key event ultimately responsible for causing death or if other processes are involved.

Environmental Implications and Risk Assessment. Salmonids are of significant ecological, commercial, and recreational importance in many countries around the world, and this study highlights that the acute toxicity of 6PPD-quinone previously reported for coho salmon^{3,5} is also of significant concern for other key receptors, including rainbow trout and brook trout. While there have only been a limited number of studies that characterized the presence of 6PPD-

quinone in surface waters and urban runoff,^{7,8} available reports clearly highlight that commonly found concentrations of this emerging contaminant exceed toxicity thresholds reported here and by Tian et al.⁵ Hence, 6PPD-quinone appears to pose a significant and widespread ecological risk to these species, and potentially other salmonids, especially downstream of urban areas and in smaller water bodies receiving roadway runoff.^{5,7,8} However, other ecologically relevant genera and families of fishes have not been studied to date, which represents an important uncertainty at this point.

The observed differences in the temporal dynamics of time to death among the three species for which acute effects of 6PPD-quinone have been observed to date are interesting. While in coho salmon⁵ and brook trout morbidities at the greatest concentrations were observed as early as 1–2 h after initiation of exposure, in rainbow trout the first mortalities did not occur until ~7 h at comparable concentrations. As exposure conditions were comparable among experiments in terms of temperature (10–13 °C), pH (6.7–8.3), and DO (>90% saturation), it is unlikely that these parameters would have been a driving factor. Despite the similar LC₅₀ values observed for all three species, these differences may have significant implications for ecological risk assessment of urban runoff events. The shorter time to death for coho salmon and brook trout may increase their risk of mortality prior to dilution of stormwater in receiving water bodies over time after rain events.

Future Research Needs. For more comprehensive future risk assessments of 6PPD-quinone in aquatic ecosystems, it is imperative to study its acute and sublethal effects in a broad range of fish species. More research into the potential respiratory or cardiovascular mechanisms of action is needed to conclusively and comprehensively elucidate the specific mechanism by which 6PPD-quinone triggers URMS in select salmonids and possibly other fishes. Most importantly, drivers of species differences in sensitivity need to be studied; i.e., why are some salmonids more sensitive than others? Several native salmonid fish species (e.g., cutthroat trout, *Oncorhynchus clarkii*; bull trout, *Salvelinus confluentus*)^{14–16} are at risk of extinction in parts of their native range, and the contribution of 6PPD-quinone to their stock status needs to be urgently investigated.

■ ASSOCIATED CONTENT

SI Supporting Information

The Supporting Information is available free of charge at <https://pubs.acs.org/doi/10.1021/acs.estlett.2c00050>.

Additional details of the chemical analytical methods (Text S1) and results (Table S1 and Figures S1 and S2) and results of hematocrit measurements in brook trout (Figure S3) (PDF)

Video of characteristic symptoms of brook trout exposed to 6PPD-quinone, here loss of equilibrium and spiraling (MOV)

Video of characteristic symptoms of rainbow trout exposed to 6PPD-quinone, here gasping (MOV)

■ AUTHOR INFORMATION

Corresponding Author

Markus Hecker – Toxicology Centre, University of Saskatchewan, Saskatoon S7N 5B3, Canada; School of Environment and Sustainability (SENS), University of

Saskatchewan, Saskatoon S7N 5CN, Canada;

Email: markus.hecker@usask.ca

Authors

Markus Brinkmann – Toxicology Centre, University of Saskatchewan, Saskatoon S7N 5B3, Canada; School of Environment and Sustainability (SENS), University of Saskatchewan, Saskatoon S7N 5CN, Canada; Global Institute for Water Security (GIWS), University of Saskatchewan, Saskatoon S7N 3H5, Canada; orcid.org/0000-0002-4985-263X

David Montgomery – Toxicology Centre and Toxicology Graduate Program, University of Saskatchewan, Saskatoon S7N 5B3, Canada

Summer Selinger – Toxicology Centre and Toxicology Graduate Program, University of Saskatchewan, Saskatoon S7N 5B3, Canada

Justin G. P. Miller – Department of Biological Sciences, University of Lethbridge, Lethbridge T1K 3M4, Canada

Eric Stock – Department of Biological Sciences, University of Lethbridge, Lethbridge T1K 3M4, Canada

Alper James Alcaraz – Toxicology Centre, University of Saskatchewan, Saskatoon S7N 5B3, Canada; orcid.org/0000-0002-3213-6805

Jonathan K. Challis – Toxicology Centre, University of Saskatchewan, Saskatoon S7N 5B3, Canada; orcid.org/0000-0003-3514-0647

Lynn Weber – Toxicology Centre, University of Saskatchewan, Saskatoon S7N 5B3, Canada; Department of Veterinary Biomedical Sciences, Western College of Veterinary Medicine, University of Saskatchewan, Saskatoon S7N 5B4, Canada

David Janz – Toxicology Centre, University of Saskatchewan, Saskatoon S7N 5B3, Canada; Department of Veterinary Biomedical Sciences, Western College of Veterinary Medicine, University of Saskatchewan, Saskatoon S7N 5B4, Canada

Steve Wiseman – Department of Biological Sciences, University of Lethbridge, Lethbridge T1K 3M4, Canada; Water Institute for Sustainable Environments, University of Lethbridge, Lethbridge T1K 3M4, Canada; orcid.org/0000-0002-8215-2272

Complete contact information is available at:

<https://pubs.acs.org/10.1021/acs.estlett.2c00050>

Notes

The authors declare no competing financial interest.

■ ACKNOWLEDGMENTS

This project was supported partially by a financial contribution from Fisheries and Oceans Canada. Additional funding was provided to M.B., L.W., D.J., M.H., and S.W. through the Discovery Grants program of the Natural Sciences and Engineering Research Council of Canada (NSERC). Instrumentation used for chemical analyses within this research was obtained with funding from Western Economic Diversification Canada (WED) and the Canadian Foundation for Innovation (CFI). J.K.C. was supported through the Banting Postdoctoral Fellowship program of NSERC. M.B. is currently a faculty member of the Global Water Futures (GWF) program, which received funds from the Canada First Research Excellence Funds (CFREF). S.W. and M.H. were supported by the Canada Research Chairs Program. The authors acknowledge the animal care support of Zoë Henriksen and Dale Jefferson (ATRF) and Holly Shepherd and Mamun Shamsuddin (ARF).

Analytical support was provided by Shakya Kurukulasuriya, Jenna Cantin, and Xiaowen Ji.

REFERENCES

- (1) Masoner, J. R.; Kolpin, D. W.; Cozzarelli, I. M.; Barber, L. B.; Burden, D. S.; Foreman, W. T.; Forshay, K. J.; Furlong, E. T.; Groves, J. F.; Hladik, M. L.; Hopton, M. E.; Jaeschke, J. B.; Keefe, H.; Krabbenhoft, D. P.; Lowrance, R.; Romanok, K. M.; Rus, D. L.; Selbig, W. R.; Williams, B. H.; Bradley, P. M. Urban Stormwater: An Overlooked Pathway of Extensive Mixed Contaminants to Surface and Groundwaters in the United States. *Environ. Sci. Technol.* **2019**, *53*, 10070–10081.
- (2) Zgheib, S.; Moilleron, R.; Chebbo, G. Priority Pollutants in Urban Stormwater: Part 1 - Case of Separate Storm Sewers. *Water Res.* **2012**, *46* (20), 6683–6692.
- (3) McIntyre, J. K.; Prat, J.; Cameron, J.; Wetzel, J.; Mudrock, E.; Peter, K. T.; Tian, Z.; Mackenzie, C.; Lundin, J.; Stark, J. D.; King, K.; Davis, J. W.; Kolodziej, E. P.; Scholz, N. L. Treading Water: Tire Wear Particle Leachate Recreates an Urban Runoff Mortality Syndrome in Coho but Not Chum Salmon. *Environ. Sci. Technol.* **2021**, *55* (17), 11767–11774.
- (4) Peter, K. T.; Tian, Z.; Wu, C.; Lin, P.; White, S.; Du, B.; McIntyre, J. K.; Scholz, N. L.; Kolodziej, E. P. Using High-Resolution Mass Spectrometry to Identify Organic Contaminants Linked to Urban Stormwater Mortality Syndrome in Coho Salmon. *Environ. Sci. Technol.* **2018**, *52* (18), 10317–10327.
- (5) Tian, Z.; Zhao, H.; Peter, K. T.; Gonzalez, M.; Wetzel, J.; Wu, C.; Hu, X.; Prat, J.; Mudrock, E.; Hettinger, R.; Cortina, A. E.; Biswas, R. G.; Kock, F. V. C.; Soong, R.; Jenne, A.; Du, B.; Hou, F.; He, H.; Lundeen, R.; Gilbreath, A.; Sutton, R.; Scholz, N.; Davis, J.; Dodd, M. C.; Simpson, A.; McIntyre, J. K.; Kolodziej, E. P. A Ubiquitous Tire Rubber-Derived Chemical Induces Acute Mortality in Coho Salmon. *Science* **2021**, *371* (6525), 185–189.
- (6) Tian, Z.; Gonzalez, M.; Rideout, C. A.; Zhao, H. N.; Hu, X.; Wetzel, J.; Mudrock, E.; James, C. A.; McIntyre, J. K.; Kolodziej, E. P. 6PPD-Quinone: Revised Toxicity Assessment and Quantification with a Commercial Standard. *Environ. Sci. Technol. Lett.* **2022**, *9*, 140.
- (7) Challis, J. K.; Popick, H.; Prajapati, S.; Harder, P.; Giesy, J. P.; McPhedran, K.; Brinkmann, M. Occurrences of Tire Rubber-Derived Contaminants in Cold-Climate Urban Runoff. *Environmental Science & Technology Letters* **2021**, *8* (11), 961–967.
- (8) Johannessen, C.; Helm, P.; Lashuk, B.; Yargeau, V.; Metcalfe, C. D. The Tire Wear Compounds 6PPD-Quinone and 1,3-Diphenylguanidine in an Urban Watershed. *Arch. Environ. Contam. Toxicol.* **2022**, *82*, 171.
- (9) Varshney, S.; Gora, A. H.; Siriappagoudar, P.; Kiron, V.; Olsvik, P. A. Toxicological effects of 6PPD and 6PPD quinone in zebrafish larvae. *Journal of Hazardous Materials* **2022**, *424*, 127623.
- (10) Hiki, K.; Asahina, K.; Kato, K.; Yamagishi, T.; Omagari, R.; Iwasaki, Y.; Watanabe, H.; Yamamoto, H. Acute Toxicity of a Tire Rubber-Derived Chemical, 6PPD Quinone, to Freshwater Fish and Crustacean Species. *Environmental Science & Technology Letters* **2021**, *8* (9), 779–784.
- (11) Biological test method: acute lethality test using rainbow trout. Report EPS 1/RM/9; Environmental Protection Series; Method Development and Applications Section, Environmental Technology Centre, Environment Canada, 1990.
- (12) OECD Guidelines for the Testing of Chemicals, Section 2: Effects on Biological Systems. Test No. 203: Fish, Acute Toxicity Test. Organisation for Economic Cooperation and Development (OECD): Paris, 2019.
- (13) Blair, S. I.; Barlow, C. H.; McIntyre, J. K. Acute cerebrovascular effects in juvenile coho salmon exposed to roadway runoff. *Canadian Journal of Fisheries and Aquatic Sciences* **2021**, *78* (2), 103–109.
- (14) Katz, J.; Moyle, P. B.; Quinones, R. M.; Israel, J.; Purdy, S. Impending extinction of salmon, steelhead, and trout (Salmonidae) in California. *Environmental Biology of Fishes* **2013**, *96* (10), 1169–1186.
- (15) Rodtka, M.; Post, J. R.; Johnston, F. D. Status of the Bull Trout (*Salvelinus confluentus*) in Alberta: Update 2009. Alberta Sustainable Resource Development: Strathmore, AB, 2009.
- (16) Allen, B.; Anderson, M.; Mee, J.; Coombs, M.; Rogers, S. Role of genetic background in the introgressive hybridization of rainbow trout (*Oncorhynchus mykiss*) with Westslope cutthroat trout (*O. clarkii lewisi*). *Conservation Genetics* **2016**, *17* (3), 521–531.

Urban Roadway Runoff Is Lethal to Juvenile Coho, Steelhead, and Chinook Salmonids, But Not Congeneric Sockeye

B. F. French, D. H. Baldwin, J. Cameron, J. Prat, K. King, J. W. Davis, J. K. McIntyre, and N. L. Scholz*



Cite This: *Environ. Sci. Technol. Lett.* 2022, 9, 733–738



Read Online

ACCESS |



Metrics & More



Article Recommendations



Supporting Information

ABSTRACT: We compared the sensitivity of closely related Pacific salmon and steelhead (*Oncorhynchus* spp.) to untreated urban stormwater runoff across three storm events. Juvenile coho, sockeye, steelhead, and Chinook were exposed for 24 h to untreated urban runoff and then transferred to clean water for 48 h. As anticipated from previous studies, coho were highly susceptible to runoff toxicity, with cumulative mortality rates ranging from 92%–100% across the three storms. By contrast, juvenile sockeye were unaffected (100% survival), and cumulative mortality rates were intermediate for steelhead (4%–42%) and Chinook (0%–13%). Furthermore, coho died rapidly following the onset of stormwater exposure (generally <4 h), whereas mortality in Chinook and steelhead was delayed by 1–2 days. Similar to previous findings for coho, steelhead and Chinook did not recover when transferred to clean water. Lastly, significant mortality occurred in coho even when roadway runoff was diluted by 95% in clean water. Our findings extend the urban runoff mortality syndrome in salmonids and point to a near-term need for sublethal studies in steelhead and Chinook to more precisely understand stormwater risks to threatened species recovery efforts in the western United States.

KEYWORDS: urbanization, stormwater, endangered species, *Oncorhynchus*, microplastics, 6PPD-quinone, urban runoff mortality syndrome, tire wear particles



INTRODUCTION

Recent advances in analytical methods have made it increasingly possible to fractionate urban stormwater runoff into individual and identifiable toxic components. These efforts have yielded several chemicals of emerging concern (CECs) that are derived primarily from vehicle tires and therefore ubiquitous in roadway runoff.^{1,2} Many are essentially unknown to ecotoxicology despite an apparent prevalence in the environment^{3,4} and rapid mobilization in stormwater runoff.^{5–7} One such CEC is *N*-(1,3-dimethylbutyl)-*N*'-phenyl-*p*-phenylenediamine (6PPD), an antiozonant added during the manufacture of tires to help prevent tread degradation. Ozone abiotically converts 6PPD into 6PPD-quinone, as well as other transformation products.⁸

For the past two decades, researchers in the Pacific Northwest of the United States (U.S.) have been studying a severe urban runoff mortality syndrome in coho salmon (*Oncorhynchus kisutch*). This forensic investigation eventually led to the discovery of 6PPD-quinone (6PPD-q) as the primary causal agent in the urban runoff mortality phenomenon.⁴ Recurring, stormwater-driven dieoffs pose a significant threat to the near-term and long-term conservation of wild coho populations,⁹ several of which are currently managed under the U.S. Endangered Species Act (ESA). The

conservation implications for ESA-listed salmon are considerable, given high rates of premature death (up to 90% or more) among adult coho returning to spawn in urban watersheds, as documented in field surveys across multiple years in Puget Sound and elsewhere.^{10,11}

At present, uncertainty around the extent to which roadway runoff toxicants, including 6PPD-q and other tire antioxidant/antiozonant transformation products, impact aquatic taxa beyond coho is spurring a global effort in ecotoxicology.^{3,12,20} Although environmental health data are limited, there appears to be variation in vulnerability to roadway runoff even among closely related species of Pacific salmon belonging to the genus *Oncorhynchus*. This is evident from recent studies, wherein adult coho and chum (*O. keta*) were exposed to urban runoff or tire leachate, with high mortality observed in coho but not chum.^{13,14} These differences in survival were consistent with observations from field surveys that previously documented

Received: July 8, 2022

Revised: July 28, 2022

Accepted: July 28, 2022

Published: August 24, 2022



high rates of premature spawner mortality in coho but not chum in restored urban catchments.¹⁰ However, the vulnerability of other Pacific salmonids to urban roadway runoff, including sockeye (*O. nerka*), Chinook (*O. tshawytscha*), and steelhead (ocean-going rainbow trout; *O. mykiss*), has not been determined. In the context of the ESA, this represents a major information gap, particularly for stream-type Chinook and steelhead that spend proportionately more time in freshwater habitats as juveniles, where they are more likely to be exposed to runoff from the transportation grid. Moreover, relative to coho, ESA-listed Chinook and steelhead populations encompass a much wider range of river basins in the western U.S., particularly in California (see www.fisheries.noaa.gov/species-directory/threatened-endangered for current ESA range designations).

It was recently shown that juvenile coho, in addition to spawning adults, are highly susceptible to the mortality syndrome.¹⁵ Salmonids other than coho, including *O. mykiss*, also appear vulnerable.¹² In the present study, we extended these earlier observations by coexposing juvenile coho, sockeye, Chinook, and steelhead to runoff collected during multiple rain events. We focused on small subyearlings (coho, sockeye, Chinook) as well as larger age 1+ juveniles (coho, steelhead), and used coho as a positive control for the baseline toxicity of untreated stormwater (i.e., as confirmation of the mortality syndrome). Our study had three primary objectives: (1) determine whether ESA-listed species other than coho are vulnerable to acutely lethal stormwater toxicity, (2) evaluate the time course for mortality across species and whether affected fish recover in clean water, and (3) assess the role of dilution as a factor influencing survival, using juvenile coho as an indicator species.

MATERIALS AND METHODS

Urban Roadway Runoff Collection and Transport.

Urban stormwater was collected from downspouts draining a short section of elevated urban arterial (west-bound onramp to State Route 520 from Montlake Boulevard in Seattle, Washington). Runoff from six storms was collected at different times of the year in 2018 (August 26, October 25, and December 17) and 2019 (March 12, March 25, and April 4). During each storm event, runoff was filtered through a fiberglass window screen to remove coarse debris and collected in 900 L or 1325 L stainless steel collection totes (Custom Metalcraft Inc., Springfield MO) for subsequent transport at ambient temperature to the Washington State University Research and Extension Center in Puyallup (WSU-P). Juvenile salmonid exposures were initiated within 24 h of each storm event. Note that 6PPD-q levels in runoff from this location have been previously measured across nine storms in 2017–2019,^{4,19} including the October and December collection events used here in 2018; all storms contained 6PPD-q at concentrations expected to be lethal to juvenile coho (Table S3).

Juvenile Salmon and Steelhead. Juvenile coho, sockeye, and Chinook salmon as well as an ocean-migrating stock of *O. mykiss* (hereafter referred to as steelhead) were obtained from local hatcheries, held in a recirculating freshwater system at WSU-P on a 12:12 h dark:light cycle, and fed daily with commercial fish food (BioVita, Bio-Oregon). Fish rearing water consisted of municipal water treated with reverse osmosis and adjusted to pH 7.6 and a conductivity of 1500 $\mu\text{S}/\text{cm}$, then passed through a bead filter, UV reactor,

bioreactor, and chiller. Sockeye prefer cooler waters (8 °C optimum), and thus exposure temperatures were maintained at 5.0–10.3 °C for the cross-species vulnerability experiments involving sockeye and the three other salmonids. For the dilution experiments (coho only), temperatures ranged from 10.0 to 12.1 °C. Fish sizes and water quality measurements for all experiments are described in the Supporting Information (Tables S3 and S4); experimental protocols were approved by Washington State University's Institutional Animal Care and Use Committee.

Stormwater Exposures to Assess Species-Specific Sensitivity. For the multispecies comparisons, replicate groups of juvenile salmonids were exposed to undiluted roadway runoff (100% stormwater) for 24 h following each of the three 2019 storm events and then transferred to clean (rearing) water for an additional 48 h (Table S1). Coho served as positive controls for the urban mortality syndrome in side-by-side exposures using subyearlings (coho, sockeye, and Chinook) and larger age 1+ salmonids (coho and steelhead). We selected an ocean-migrating stock of *O. mykiss* to differentiate the steelhead life history from domesticated, freshwater-resident strains of rainbow trout.

Static exposures were carried out in 35 L glass aquaria containing either 30 L of clean water or 100% stormwater. For the smaller fish (subyearling coho, Chinook, and sockeye), 9–10 fish were placed in each of the three replicate exposure tanks. For the larger (age 1+) coho and steelhead, $n = 6$ fish were placed in each of four replicate exposure tanks. A few fish escaped into the surrounding water bath and were excluded (Table S1).

Exposure tanks were supplied with air stones for oxygenation (>10 mg/L) and placed in flow-through water baths with chillers to maintain temperatures. Across all three storms, mortality was monitored throughout exposure periods at regular intervals (2, 4, 8, and 24 h). Final reported mortality counts included moribund fish that did not react to gentle prodding and were removed and euthanized with MS-222 (400 mg/L) followed by severing the spinal cord.

All fish surviving the 24 h exposure were transferred to larger (57 L) tanks containing clean water for a 48 h depuration. For the smaller fish (subyearling coho, Chinook, and sockeye), individuals were removed from the three replicate exposure tanks and grouped into a single depuration tank with a maximum number of 30 fish per tank. For the larger age 1+ coho and steelhead, fish from individual exposure tanks were divided evenly into two depuration tanks ($n = 12$ maximum per tank, to adjust for larger fish). Moribund and dead fish were monitored and removed midway through depuration (48 h) and at the end of depuration (72 h).

Stormwater Exposures to Assess the Influence of Dilution on the Mortality Syndrome. To evaluate dilution, juvenile coho were exposed to a graded stormwater concentration series for 24 h following three storms in 2018 (Table S2). Juvenile coho (age 1+; Table S4) were placed in static exposure chambers as described above. Glass aquaria (35 L) were filled with either 30 L of clean water or urban stormwater diluted to 25%, 11.2%, 5%, 2.2%, or 1% with clean water. For the August and December storms, individual fish ($n = 8$, adjusted for size) were placed in each of three replicate tanks per concentration. For the October storm, a mechanical failure (chiller) necessitated a shift in experimental design, whereby $n = 10$ fish were exposed in each of the two replicate

tanks per dilution. Mortality was enumerated as described above.

Statistical Analyses. Statistical analyses were developed using R (<https://www.r-project.org/>) and RStudio (<https://www.rstudio.com>). Mortality was calculated in proportion to the total number of individuals across all tanks within a given treatment (e.g., exposure, species, time, and/or dilution; see data in Tables S1 and S2). For each observed proportion, the 95% confidence interval was calculated using the BinomCI function from the DescTools R package with the “modified Wilson” method to account for proportions near 0 and 1 (presented as percentages in Figure 1). Differences among treatments were determined by comparing confidence intervals around the observed proportions.

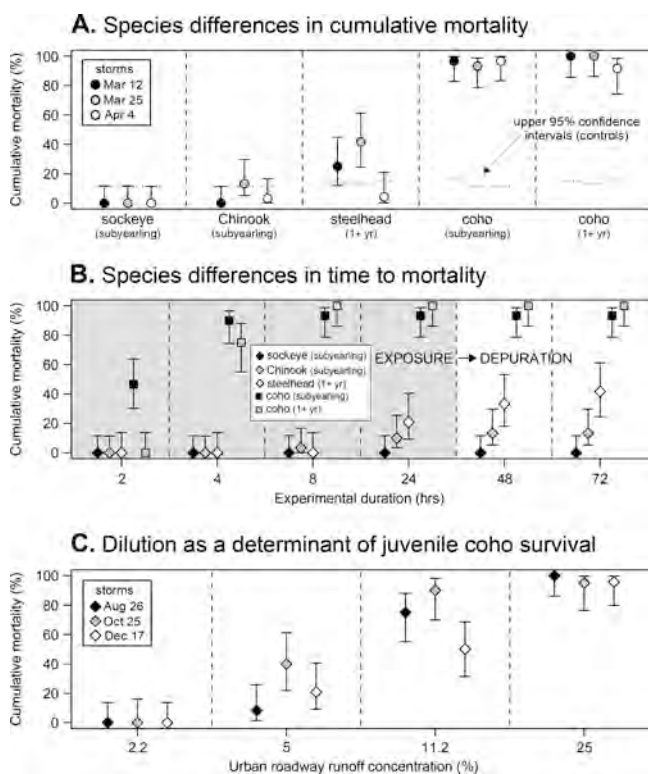


Figure 1. Cumulative mortality (% and 95% confidence interval) of juvenile Pacific salmonids exposed to urban roadway runoff. (A) Species differences across three storms following 24 h exposure and 48 h depuration. Upper 95% confidence intervals of controls are shown as dotted lines. (B) Species differences in mortality over time for a single storm (March 25) after 24 h exposure (gray shaded area) and 48 h depuration (unshaded area). (C) Mortality in coho (1+ yr) exposed for 24 h to different dilutions of roadway runoff over three storms. No mortality was observed in controls. (A–C) Data from all control and exposed fish are shown in Tables S1 and S2. Fish age is noted as subyearlings or 1+ yrs.

RESULTS AND DISCUSSION

Varying Mortality in Response to Untreated Stormwater Across Salmonid Species. Juvenile sockeye, Chinook, and steelhead, as well as two size classes of juvenile coho (positive controls), were exposed to untreated roadway runoff from three separate storm events (Figure 1A). As anticipated from earlier studies,^{4,15,16} subyearling and larger (age 1+) coho were highly susceptible to toxic runoff, as evidenced by >90% cumulative mortality (Figure 1A; right-

most panels) across all three 2019 storms. Conversely, all juvenile sockeye survived 24 h exposures to runoff, irrespective of the storm, similar to previous observations of 100% survival for chum.^{13,14} The response of juvenile Chinook was less consistent, with only modest mortality in response to the second (March 25) storm. Steelhead were intermediate between sockeye (no deaths) and coho (almost no survivors), with proportionately higher mortality for the first and second storms (Figure 1A).

Species-Specific Timelines for the Mortality Syndrome. Among Pacific salmonids, the stormwater mortality phenomenon has primarily been studied in coho, where the progression of the syndrome—from asymptomatic fish to visible distress (disorientation, loss of equilibrium) to death—occurs over a span of a few hours in fish exposed to 100% stormwater. In accord with earlier published results,¹⁵ juvenile coho began dying soon during exposure (2–4 h), with near-maximal cumulative mortality within 8 h (Figure 1B; stormwater exposure window in shaded panels at left). Relative to coho (positive controls), the progressions of symptoms in Chinook and steelhead were qualitatively the same (surface swimming and gaping, loss of equilibrium) albeit with a delayed onset and a longer window for mortality thereafter, with fish generally dying toward the end of the 24 h exposure or after subsequent transfer to clean water. Hence, similar to coho,¹⁵ the distress syndrome in Chinook and steelhead appears irreversible.

Influence of Dilution on Coho Survival. Our sourcing of stormwater from an urban arterial with high traffic volume (relatively concentrated runoff) is well suited for studies of green infrastructure effectiveness^{16,17} but is less representative of exposure conditions in salmon habitats where stormwater is diluted by receiving waters. To evaluate the influence of dilution on survival, juvenile coho were exposed to runoff from three separate storm events for 24 h, at concentrations ranging from 1% to 25%. Mixtures containing 5% or more stormwater were generally lethal to juvenile coho (Figure 1C). Note that the upper end of the exposure range (25% runoff diluted in clean water) was chosen based on maximal coho lethality in pilot experiments; untreated surface runoff is likely to represent more than 25% of receiving surface water volumes in many urban watersheds.

Implications. In the U.S. Pacific Northwest, the urban runoff mortality phenomenon has been studied intensively for the past two decades, with a primary focus on adult coho returning from the ocean to spawn in urbanized Puget Sound watersheds.^{10,18} Wild coho populations are unlikely to withstand the high rates of dying spawners previously and consistently documented in urban stream reach surveys.⁹ The mortality syndrome was subsequently extended to juvenile coho,¹⁵ which enabled relatively high-throughput testing of stormwater fractions and set the stage for the eventual discovery of 6PPD-q as the causative agent.⁴ Because the parent compound (6PPD) and other chemicals similar in structure and function are ubiquitous in motor vehicle tires worldwide, there has been an expanding effort to identify other fish species at risk from exposure to untreated roadway runoff. Our current findings extend the urban runoff mortality phenomenon to steelhead and Chinook but with phenotypic nuances in severity (less) and time course (longer) relative to coho. Nevertheless, the characteristics of the syndrome in coho exposed to roadway runoff (e.g., the present study; Chow et al.¹⁵) or 6PPD-q alone (e.g., Tian et al.⁴) are the same,

implying a common underlying mechanism. The discussion that follows therefore hypothesizes that the coho, steelhead, and Chinook toxicity observed here was caused by 6PPD-q across the different stormwater collections, an assumption further supported by recent findings for *O. mykiss*.¹² For context, coho are exceptionally sensitive to 6PPD-q toxicity, with lethality (LC50) in response to exposure concentrations less than 0.1 parts per billion.¹⁹ In the present study, 6PPD-q levels were likely to have exceeded this acute lethality threshold for coho across all storms by an order of magnitude. This is supported by published 6PPD-q measurements in runoff from the same source (SR520 elevated bridge) across nine separate rain events in 2017–2019,^{4,19} including the October and December stormwaters collected for the dilution experiments in Figure 1C (Table S3).

Our current findings are the first demonstration of urban runoff-driven mortality in Chinook, and our sockeye results reinforce what are apparently stark differences in vulnerability across closely related salmonids. For example, whereas coho (*O. kisutch*) are highly sensitive,¹⁹ several field and laboratory studies have shown that congeneric chum salmon (*O. keta*) are not.^{10,13} Similar to chum, zebrafish (*Danio rerio*) and medaka (*Oryzias latipes*) appear relatively insensitive to 6PPD-q,^{20,21} along with Arctic char (*Salvelinus alpinus*) and white sturgeon (*Acipenser transmontanus*).¹² Conversely, Brinkmann et al.¹² recently showed that brook trout (*Salvelinus fontinalis*), like coho, are also highly sensitive to the acutely lethal toxicity of 6PPD-q. Intriguingly, in the same study, the time to death for rainbow trout (*O. mykiss*) was intermediate, with mortality occurring over a more protracted timeline of a few days. On the basis of these initial findings, the Salmonidae appear to sort into roughly three categories of vulnerability to 6PPD-q acute toxicity: high (coho salmon and brook trout), low (chum and sockeye salmon, Arctic char), and intermediate (steelhead/rainbow trout, Chinook salmon).

In the context of threatened species management, the recent *O. mykiss* results are particularly noteworthy. In addition to being a model test organism in aquatic toxicology, rainbow trout are an important aquaculture species for recreational fishing.²² In the western United States, several distinct population segments (or evolutionarily significant units) of ocean-migrating *O. mykiss* (steelhead) are currently listed for protection under the U.S. Endangered Species Act (ESA). Accordingly, freshwater and estuarine habitats critical for steelhead conservation and recovery have been designated across major metropolitan areas in the coastal and interior regions of California, Oregon, and Washington. The overlap between these recovery domains and the expanding transportation grid, at the watershed and basin scales, is extensive. The ESA requires that federal natural resource managers consider the impacts of federal actions on listed species, and stormwater contaminants (e.g., 6PPD-q) represent a habitat factor that was largely unknown to science when steelhead were listed.

For *O. mykiss*, the initial evidence suggests that life history plasticity (i.e., freshwater residence vs ocean migration) is not a determinant of susceptibility, albeit premised on two important assumptions: (1) Variation in genetics or husbandry/culture practices between the *O. mykiss* stocks used here and those sourced for Brinkmann et al.¹² did not influence observed toxicity, and (2) 6PPD-q was the causative agent for *O. mykiss* deaths here, thus facilitating a direct comparison of mortality across the two studies. Irrespective, more work is needed—

particularly experimental designs that consider phenotypic and genetic differences across wild steelhead stocks. The intermediate and delayed nature of the mortality syndrome in steelhead and Chinook (relative to coho) also raises the potential significance of sublethal toxicity. The recent discovery of 6PPD-q should expedite functional studies of neurobehavioral and cardiorespiratory dysregulation, to match the consistently dominant features of the distress phenotype (e.g., surface swimming and gaping, loss of orientation and equilibrium).

Our findings also directly address the potential role of dilution in receiving waters, as a conventional management strategy for reducing toxic impacts to aquatic communities. Recent laboratory study designs^{14–17} have used urban runoff from a relatively intensively trafficked arterial, in part as a strategy to establish a clear baseline of toxicity in fish and invertebrates prior to green infrastructure treatments to evaluate pollutant removal and improved organismal health. While this approach was useful for challenging bioinfiltration soil systems,^{16,17} exposures to undiluted arterial roadway runoff are not necessarily representative of receiving water quality conditions in large rivers or lakes or in habitats downstream from a site-specific stormwater discharge. Field surveys have consistently demonstrated high rates of coho spawner mortality across all urban watersheds where the phenomenon has been studied closely.¹¹ Therefore, a protective role for dilution has (to date) seemed unlikely, given these indirect lines of evidence.^{10,11} Consistent with this, arterial runoff was acutely lethal to juvenile coho salmon, even when diluted in 95% clean water. Additional factors working against “dilution as the solution” to the urban runoff mortality syndrome include the ubiquitous and diffuse nature of stormwater inputs to salmon habitats (e.g., serial and repeated discharges along migration corridors), ongoing climate change (i.e., reduced receiving water volumes), and the possibility of sublethal toxicity at the lower end of the dilution exposure range examined here. To address these factors, future studies can focus on a few related chemicals (antiozonants and associated transformation products, as opposed to whole urban runoff), using an extensive and established set of tools for studying cardiorespiratory and neurobehavioral toxicity in fish (e.g., Blair et al.²³). These studies are needed to more precisely define sublethal toxicity thresholds in ESA-listed steelhead and Chinook and to better understand what appear to be striking sensitivity differences across closely related species of salmon, trout, and char.

■ ASSOCIATED CONTENT

Supporting Information

The Supporting Information is available free of charge at <https://pubs.acs.org/doi/10.1021/acs.estlett.2c00467>.

Table S1: All data for the species comparison exposure studies. Table S2: All data collected for the exposure studies evaluating dilution effect. Table S3: Storm information and water quality measurements. Table S4: Information related to the fish such as age, size, and hatchery of origin. (XLSX)

■ AUTHOR INFORMATION

Corresponding Author

N. L. Scholz — Northwest Fisheries Science Center, National Marine Fisheries Service, National Oceanic and Atmospheric

Administration, Seattle, Washington 98112, United States;
orcid.org/0000-0001-6207-0272;
Email: nathaniel.scholz@noaa.gov

Authors

- B. F. French** – Northwest Fisheries Science Center, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, Seattle, Washington 98112, United States;
orcid.org/0000-0002-2358-9044
- D. H. Baldwin** – Office of Protected Resources, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, Seattle, Washington 98115, United States
- J. Cameron** – Saltwater Inc, under contract to Northwest Fisheries Science Center, National Marine Fisheries Service, National Oceanic and Atmospheric Administration, Seattle, Washington 98112, United States
- J. Prat** – School of the Environment, Puyallup Research and Extension Center, Washington State University, Puyallup, Washington 98371, United States
- K. King** – Environmental Contaminants Program, United States Fish and Wildlife Service, Lacey, Washington 98503, United States
- J. W. Davis** – Environmental Contaminants Program, United States Fish and Wildlife Service, Lacey, Washington 98503, United States
- J. K. McIntyre** – School of the Environment, Puyallup Research and Extension Center, Washington State University, Puyallup, Washington 98371, United States; orcid.org/0000-0003-3480-7083

Complete contact information is available at:
<https://pubs.acs.org/10.1021/acs.estlett.2c00467>

Notes

The authors declare no competing financial interest.

ACKNOWLEDGMENTS

This effort was supported by federal funding for Puget Sound recovery (EPA Interagency Agreement DW-014092437301). Washington State University was also supported by the Alice C. Tyler Trust, the Governor of Washington State, McIntire-Stennis Grant #NI19MSCFRXXG034, accession #1015288 from the USDA National Institute of Food and Agriculture, and Seattle Public Utilities. We thank Emma Mudrock and Jill Wetzel for assistance with animal husbandry and conducting the exposures. Fish were generously provided by the Washington Department of Fish & Wildlife and the Puyallup Tribe. Additional assistance was provided by Chelsea Mitchell, Stephanie Blair, Lane Maguire, Ben Leonard, Michelle Chow, Jana Labenia, and Julann Spromberg. Our thanks to Su Kim for creating the graphic embedded in the abstract. Findings and conclusions herein are those of the authors and do not necessarily represent the views of the sponsoring organizations.

REFERENCES

- (1) Tian, Z.; Peter, K. T.; Gipe, A. D.; Zhao, H.; Hou, F.; Wark, D. A.; Khangaonkar, T.; Kolodziej, E. P.; James, C. A. Suspect and Nontarget Screening for Contaminants of Emerging Concern in an Urban Estuary. *Environ. Sci. Technol.* **2020**, *54* (2), 889–901.
- (2) Du, B.; Lofton, J. M.; Peter, K. T.; Gipe, A. D.; James, C. A.; McIntyre, J. K.; Scholz, N. L.; Baker, J. E.; Kolodziej, E. P. Development of Suspect and Non-target Screening Methods for Detection of Organic Contaminants in Highway Runoff and Fish Tissue with High-resolution Time-of-flight Mass Spectrometry. *Environmental Science: Processes & Impacts* **2017**, *19* (9), 1185–1196.
- (3) Peter, K. T.; Lundin, J. I.; Wu, C.; Feist, B. E.; Tian, Z.; Cameron, J. R.; Scholz, N. L.; Kolodziej, E. P. Characterizing the Chemical Profile of Biological Decline in Stormwater-Impacted Urban Watersheds. *Environ. Sci. Technol.* **2022**, *56* (5), 3159–3169.
- (4) Tian, Z.; Zhao, H.; Peter, K. T.; Gonzalez, M.; Wetzel, J.; Wu, C.; Hu, X.; Prat, J.; Mudrock, E.; Hettinger, R.; Cortina, A. E.; Biswas, R. G.; Kock, F. V. C.; Soong, R.; Jenne, A.; Du, B.; Hou, F.; He, H.; Lundeen, R.; Gilbreath, A.; Sutton, R.; Scholz, N. L.; Davis, J. W.; Dodd, M. C.; Simpson, A.; McIntyre, J. K.; Kolodziej, E. P. A Ubiquitous Tire Rubber-derived Chemical Induces Acute Mortality in Coho Salmon. *Science* **2021**, *371* (6525), 185–189.
- (5) Peter, K. T.; Hou, F.; Tian, Z.; Wu, C.; Goehring, M.; Liu, F.; Kolodziej, E. P. More Than a First Flush: Urban Creek Storm Hydrographs Demonstrate Broad Contaminant Pollutographs. *Environ. Sci. Technol.* **2020**, *54* (10), 6152–6165.
- (6) Rauert, C.; Charlton, N.; Okoffo, E. D.; Stanton, R. S.; Agua, A. R.; Pirrung, M. C.; Thomas, K. V. Concentrations of Tire Additive Chemicals and Tire Road Wear Particles in an Australian Urban Tributary. *Environ. Sci. Technol.* **2022**, *56* (4), 2421–2431.
- (7) Johannessen, C.; Helm, P.; Lashuk, B.; Yargeau, V.; Metcalfe, C. D. The Tire Wear Compounds 6PPD-Quinone and 1,3-Diphenylguanidine in an Urban Watershed. *Arch. Environ. Contam. Toxicol.* **2022**, *82* (2), 171–179.
- (8) Seiwert, B.; Nihemaiti, M.; Troussier, M.; Weyrauch, S.; Reemtsma, T. Abiotic Oxidative Transformation of 6-PPD and 6-PPD Quinone from Tires and Occurrence of their Products in Snow from Urban Roads and in Municipal Wastewater. *Water Res.* **2022**, *212*, 118122.
- (9) Spromberg, J. A.; Scholz, N. L. Estimating the Future Decline of Wild Coho Salmon Populations Resulting from Early Spawner Die-offs in Urbanizing Watersheds of the Pacific Northwest, USA. *Integrated Environmental Assessment and Management* **2011**, *7* (4), 648–656.
- (10) Scholz, N. L.; Myers, M. S.; McCarthy, S. G.; Labenia, J. S.; McIntyre, J. K.; Ylitalo, G. M.; Rhodes, L. D.; Laetz, C. A.; Stehr, C. M.; French, B. L.; McMillan, B.; Wilson, D.; Reed, L.; Lynch, K. D.; Damm, S.; Davis, J. W.; Collier, T. K. Recurrent Die-Offs of Adult Coho Salmon Returning to Spawn in Puget Sound Lowland Urban Streams. *PLoS One* **2011**, *6* (12), e28013.
- (11) Feist, B. E.; Buhle, E. R.; Baldwin, D. H.; Spromberg, J. A.; Damm, S. E.; Davis, J. W.; Scholz, N. L. Roads to Ruin: Conservation Threats to a Sentinel Species across an Urban Gradient. *Ecological Applications* **2017**, *27* (8), 2382–2396.
- (12) Brinkmann, M.; Montgomery, D.; Selinger, S.; Miller, J. G. P.; Stock, E.; Alcaraz, A. J.; Challis, J. K.; Weber, L.; Janz, D.; Hecker, M.; Wiseman, S. Acute Toxicity of the Tire Rubber-Derived Chemical 6PPD-quinone to Four Fishes of Commercial, Cultural, and Ecological Importance. *Environmental Science & Technology Letters* **2022**, *9*, 333–338.
- (13) McIntyre, J. K.; Prat, J.; Cameron, J.; Wetzel, J.; Mudrock, E.; Peter, K. T.; Tian, Z.; Mackenzie, C.; Lundin, J.; Stark, J. D.; King, K.; Davis, J. W.; Kolodziej, E. P.; Scholz, N. L. Treading Water: Tire Wear Particle Leachate Recreates an Urban Runoff Mortality Syndrome in Coho but Not Chum Salmon. *Environ. Sci. Technol.* **2021**, *55* (17), 11767–11774.
- (14) McIntyre, J. K.; Lundin, J. I.; Cameron, J. R.; Chow, M. I.; Davis, J. W.; Incardona, J. P.; Scholz, N. L. Interspecies Variation in the Susceptibility of Adult Pacific Salmon to Toxic Urban Stormwater Runoff. *Environ. Pollut.* **2018**, *238*, 196–203.
- (15) Chow, M. I.; Lundin, J. I.; Mitchell, C. J.; Davis, J. W.; Young, G.; Scholz, N. L.; McIntyre, J. K. An Urban Stormwater Runoff Mortality Syndrome in Juvenile Coho Salmon. *Aquatic Toxicology* **2019**, *214*, 105231.
- (16) McIntyre, J. K.; Davis, J. W.; Hinman, C.; Macneale, K. H.; Anulacion, B. F.; Scholz, N. L.; Stark, J. D. Soil Bioretention Protects Juvenile Salmon and their Prey from the Toxic Impacts of Urban Stormwater Runoff. *Chemosphere* **2015**, *132*, 213–219.

- (17) Spromberg, J. A.; Baldwin, D. H.; Damm, S. E.; McIntyre, J. K.; Huff, M.; Sloan, C. A.; Anulacion, B. F.; Davis, J. W.; Scholz, N. L. Coho Salmon Spawner Mortality in Western US Urban Watersheds: Bioinfiltration Prevents Lethal Storm Water Impacts. *Journal of Applied Ecology* **2016**, *53* (2), 398–407.
- (18) McCarthy, S. G.; Incardona, J.; Scholz, N. Coastal Storms, Toxic Runoff, and the Sustainable Conservation of Fish and Fisheries. *American Fisheries Society Symposium* **2008**, *64*, 7–27.
- (19) Tian, Z.; Gonzalez, M.; Rideout, C. A.; Zhao, H. N.; Hu, X.; Wetzel, J.; Mudrock, E.; James, C. A.; McIntyre, J. K.; Kolodziej, E. P. 6PPD-Quinone: Revised Toxicity Assessment and Quantification with a Commercial Standard. *Environmental Science & Technology Letters* **2022**, *9* (2), 140–146.
- (20) Hiki, K.; Asahina, K.; Kato, K.; Yamagishi, T.; Omagari, R.; Iwasaki, Y.; Watanabe, H.; Yamamoto, H. Acute Toxicity of a Tire Rubber-Derived Chemical, 6PPD Quinone, to Freshwater Fish and Crustacean Species. *Environmental Science & Technology Letters* **2021**, *8* (9), 779–784.
- (21) Varshney, S.; Gora, A. H.; Siriappagounder, P.; Kiron, V.; Olsvik, P. A. Toxicological Effects of 6PPD and 6PPD Quinone in Zebrafish Larvae. *Journal of Hazardous Materials* **2022**, *424*, 127623.
- (22) Barnes, M. E.; Whelan, G. E. Visitor Policies and Practices at Public Trout and Salmon Hatcheries in North America. *Fisheries* **2004**, *29* (10), 16–21.
- (23) Blair, S. I.; Barlow, C. H.; McIntyre, J. K. Acute Cerebrovascular Effects in Juvenile Coho Salmon Exposed to Roadway Runoff. *Canadian Journal of Fisheries and Aquatic Sciences* **2021**, *78* (2), 103–109.

Recommended by ACS

Bifenthrin, a Ubiquitous Contaminant, Impairs the Development and Behavior of the Threatened Longfin Smelt during Early Life Stages

Florian Mauduit, Richard E. Connon, *et al.*

JUNE 23, 2023

ENVIRONMENTAL SCIENCE & TECHNOLOGY

[READ !\[\]\(6059a5aa8b4ca7bb793408023d6c6e42_img.jpg\)](#)

Bioretention Cells Provide a 10-Fold Reduction in 6PPD-Quinone Mass Loadings to Receiving Waters: Evidence from a Field Experiment and Modeling

Timothy F. M. Rodgers, Rachel C. Scholes, *et al.*

JUNE 16, 2023

ENVIRONMENTAL SCIENCE & TECHNOLOGY LETTERS

[READ !\[\]\(f60b7a900783ac3fd531bfd9c111be6d_img.jpg\)](#)

Establishing an *In Vitro* Model to Assess the Toxicity of 6PPD-Quinone and Other Tire Wear Transformation Products

Justin B. Greer, John D. Hansen, *et al.*

MAY 02, 2023

ENVIRONMENTAL SCIENCE & TECHNOLOGY LETTERS

[READ !\[\]\(166772600a13ad0a433053f90fe45649_img.jpg\)](#)

Cross-Species Evaluation of Bioaccumulation Thresholds for Air-Breathing Animals

Leslie J. Saunders and Frank Wania

JULY 14, 2023

ENVIRONMENTAL SCIENCE & TECHNOLOGY

[READ !\[\]\(066cb4a00c9d9f40edb6f87372ec6f08_img.jpg\)](#)

[Get More Suggestions >](#)

FHWA (Communication ID 539007)		
Comment ID	Comment Text	Response
1	Are project updates via listserv provided in languages other than English? Is there an option for individuals to request updates in languages other than English? If so, which languages?	Email updates on the OMF South project are provided in English. At the bottom of every email are translated links to a translation services webpage where readers can request information in their language. Sound Transit fully translates notification mailers and online open houses into Spanish, Korean, and Russian (the three most common languages spoken in the study area after English). In addition, Sound Transit provided a fully translated guide to the Draft EIS that provided a similar level of information to the online open houses. These are intended to be physical handouts shared at public meetings and targeted community briefings.
2	How are language access services provided during open house and drop-in sessions? Are multi-lingual staff present?	As described in Appendix B, Public Involvement and Agency Coordination, of the Final EIS, interpreters for sign language, Spanish, Korean, and Russian were available at the in-person public meeting and hearing on October 24, 2023. For smaller public events, such as drop-ins or presentations to specific community groups, Sound Transit will arrange interpretation upon request. Staff can also access a language line for on-demand interpretation services, if needed, or follow up with someone requesting more information with the support of an interpreter.
3	Were language services provided for virtual public hearings? If so, how were they provided? (Break-out sessions in multiple languages, etc.?) Was a sign language interpreter present?	The virtual public hearings included live-captioning, sign-language interpretation, and simultaneous interpretation in Spanish, Korean, and Russian. The virtual hearings were hosted on Zoom, with on-screen and spoken instructions informing people how to tune into the appropriate audio channel on the Zoom Interpretation feature at the bottom of their screen. Information clarifying this has been added to Appendix B, Public Involvement and Agency Coordination.
4	Simple typo creates significant difference: Title VI (6), instead of Title IV (4)	The correction has been made in Appendix B of the Final EIS.
5	The project web page provides a Google translate feature at the bottom right hand corner of the home page where it blends with the rest of the page. It isn't highlighted or easily identified by bold color or font. This means LEP individuals must scan the entire, English-only, page before locating the translate option. Additionally, the "Select Language" drop-down feature is displayed exclusively in English, which means an LEP individual would have to be able to read English in order to identify that this feature offers translated languages. This is also the case for the "civil rights and complaints" link. How are LEP folx provided meaningful access to language services if they must navigate English-only language in order to identify where these services exist? Placing the "View in other languages" option at the top of	Thank you for your comment. This input has been shared with the Sound Transit web team for inclusion in future updates to the website.

FHWA (Communication ID 539007)		
Comment ID	Comment Text	Response
	the home page, in languages represented in the project area, would provide more meaningful LEP access. On the Title VI page, multiple languages are provided in the top right corner to guide LEP folx to information about the Title VI complaint process. How do LEP folx locate complaint information, in-language, on the home page?	
6	<p>This appears to be exclusively a EJ analysis and not a Title VI analysis. It does not include all Title VI protected classes or analyze them individually. The analysis aggregates minority populations and includes low-income populations.</p> <p>EJ addresses distribution of high and adverse impacts on minority and low-income populations. EJ analytical standards also recommend aggregating minority populations.</p> <p>Title VI ensures nondiscrimination in programs and activities on the basis of race, color, and national origin (all races, all colors, all national origins) and does not consider low-income. Title VI analytical standards recommend each population be analyzed individually.</p> <p>The Minority Population Distribution maps look at the density of the aggregated minority population but does not evaluate if there is a specific community (race, color, national origin) present that may be disparately impacted.</p>	<p>Sound Transit published the Title VI Facility Equity Analysis in 2021, separate from the 2021 SEPA Draft EIS. It was prepared in compliance with Title VI of the Civil Rights Act (42 U.S. Code 200d), FTA Circular 4702.1B, and Sound Transit Resolution No. R2022-19. The report is available to the public on Sound Transit's web page: https://www.soundtransit.org/sites/default/files/documents/operations-and-maintenance-facility-south-title-iv-facility-equity-analysis-report-2021110.pdf.</p> <p>The Board considered the findings of the Facility Equity Analysis in its selection of the Preferred Alternative in December 2021. Sound Transit will be publishing an amendment to the report in mid-2024 that will consider project revisions since the original analysis. The amendment will be available to the Board and the public prior to the action to select the project to be built.</p>
7	Indicates "translation assistance" was available during online hearings. Was this oral interpretation or written translation services? If it was translation (written) how was this accommodated in the virtual space? Were there break-out rooms offering translated captioning?	The OMF South Title VI Facility Equity Analysis was published separately from the Draft EIS in November 2021. The virtual public hearings included live-captioning, sign language interpretation, and simultaneous interpretation in Spanish, Korean, and Russian. The virtual hearings were hosted on Zoom, with on-screen and spoken instructions informing people how to tune into the appropriate audio channel on the Zoom Interpretation feature at the bottom of their screen.
8	Were in-language lunch groups provided oral-interpretation services or written translation services? May want to make a distinction between what type of services were provided.	Oral interpretation was provided at the in-language meal events.
9	Were translation (written) or interpretation (oral) services provided for open houses?	American Sign Language and oral interpretation were provided at in-person and virtual public hearings for 2021 Draft EIS and the 2023 Draft EIS. Translated materials (handouts and website information) were provided for all open houses. Other interpretation services have been advertised and provided upon request for open houses.
10	No information was provided regarding increases in freight traffic. If this is captured in the passenger car equivalents, please document that in the text.	The amount of freight traffic to and from the OMF site is anticipated to be minimal, particularly during the AM and PM peak hours, because deliveries would occur during off-peak hours. Therefore, freight traffic was not factored into the analysis. Section 4.2.1.1 of Appendix G1, Transportation Technical

FHWA (Communication ID 539007)		
Comment ID	Comment Text	Response
		Report, to the Final EIS has been updated to clarify this.
11	No discussion of heavy vehicle traffic increases and impacts.	The amount of freight traffic to and from the OMF site is anticipated to be minimal, particularly during the AM and PM peak hours, because deliveries would occur during off-peak hours. Therefore, freight traffic was not factored into the analysis. Section 4.2.1.1 of Appendix G1, Transportation Technical Report, to the Final EIS has been updated to clarify this.
12	I recommend using fatal and serious crash rates rather than collision rates. Regardless of the pandemic, K and A crashes have increased while total reported crashes have decreased. This assessment should assess what risks are being elevated due to the increases in traffic, both in aggregate and by type.	The City of Federal Way Transportation Impact Analysis guidelines requires total collision crash rates and only provide thresholds for high-collision locations based on total collisions. Therefore, total collision-crash rates were provided for all locations. There were also only two serious injury crashes in the entire study area and no fatal crashes, so K/A (fatal or disabling) crash rates will almost all be zero. Section 3.7.1 of Appendix G1, Transportation Technical Report, has been updated to reflect this. Additionally, while there are volume increases expected in the future, these are not because of the project. Because the project alternatives are not expected to result in impacts to traffic safety, it is not a differentiator among the alternatives.
13	The traffic safety changes experienced in 2020-2022 are realistic and should not be excluded. Exposure is accounted for by normalizing by VMT and EV. Traffic behavior has changed since 2018 and should be accounted for in decision-making.	The Final EIS relies on data from 2016 to 2018 because it provides a more conservative (higher) collision rate than data from 2020 and 2021, which reflect lower traffic volumes during the years of the COVID pandemic. Because the project alternatives are not expected to result in impacts to traffic safety, the collision data is not a differentiator among the alternatives.
14	Essential Fish Habitat should be capitalized throughout.	This revision has been made throughout the Final EIS.
15	2nd paragraph where study area extent defined, the 300' extent for pollutants isn't really consistent with conclusions in second paragraph of 3.10-13 where downstream adverse effects are acknowledged.	The description of the study area in Section 3.10, Ecosystem Resources, has been revised to explain that downstream impacts were also considered.
16	For the discussion on 6PPD-quinone where coho pre-spawn mortality is mentioned, consider expanding to include more recent science on mortality to other salmonids and trout including steelhead, Chinook salmon and rainbow trout (scientific sources provided).	The provided references have been summarized in Section 3.10, Ecosystems, and added to the reference section in Appendix A, Support Information, of the Final EIS.
17	Pg. 3.11-17: States that enhanced treatment for all post-project GIS will be provided. Does this include existing and replaced PGIS?	Yes, the project would provide treatment for existing and new pollutant-generating impervious surfaces that are part of the project, as required by local regulations.

FHWA (Communication ID 539007)		
Comment ID	Comment Text	Response
18	Table 3.11-10 shows either a net reduction or no increase in PGIS for the Preferred Alternative but later in the section (3.11.2.2) it states that OMF S. would add PGIS and non-PGIS.	The PGIS calculations were updated for the Final EIS. The updated numbers show an increase of 1.2 acres for the Preferred Alternative with the 40 mph Alignment. Please see Table 3.11-3 in the Final EIS with the updated analysis.
19	The Potential Mitigation (3.11.3) section states that no temporary or long-term adverse impacts on water resources are expected after treatment BMPs are constructed, however in the Ecosystems section, adverse effects downstream are acknowledged. I think it is valid to state that no further mitigation is likely to be required and explain that some adverse effects may occur due to the very low concentrations of some pollutants that are still deemed toxic to some fish species and the fact that even "effective" treatment won't prevent some discharges from the BMPs that may be above those thresholds.	The proposed stormwater management uses Ecology-approved BMPs that meet standards for all known, available, and reasonable methods of prevention, control, and treatment (abbreviated as AKART). Section 3.11, Water Resources, in the Final EIS was updated to note that it is possible that discharges from sites with approved stormwater management may release pollutants at low thresholds or low flows at durations that can still harm sensitive aquatic species for a period of time, due to the limitations of AKART. Nevertheless, these BMPs are expected to prevent long-term, adverse impacts to surface water and groundwater quality, and no additional mitigation is recommended.
20	There are two separate approval actions for FHWA and they should be called out separately on this list. There is an NEPA Record of Decision, Federal Highway Administration and the Air Space Lease for Use of Interstate Right of Way, Federal Highway Administration.	The suggested revision to the Fact Sheet has been made in the Final EIS.
21	FHWA wants to confirm there are no anticipated design approvals or modifications to Interstate 5 with this project, which would require FHWA approval.	The current design does not include modifications to I-5 that would require FWHA approval. If final design includes modifications, Sound Transit would apply for the necessary approvals.
22	The last paragraph in 3.6.3.1 indicates that EJ populations would accrue benefits through "the addition of new jobs to build the project." Given the way contractors are selected, there is no way to definitively say the jobs will be given to people in the vicinity of the project. Even with more lenient local hiring rules now, there is no guarantee and we would be more comfortable if this statement was left out—or include a caveat to the statement to explain that it is not a guarantee. Even though it should be obvious given the context, there should be an explanation that the benefits in the last paragraph of this section are all temporary benefits that would occur during construction. If there would be any kind of increased staffing in the area because of the maintenance facility, that could be added as a more permanent benefit related to the economic factors mentioned in this paragraph.	Section 3.6.3.1, Project Impacts and Benefits (to Environmental Justice, Social Resources, Community Facilities, and Neighborhoods), states that the benefits of job creation would be to all populations, including EJ populations. It does not include a statement that jobs would be given to the people in the vicinity of the project. Job creation would be both permanent for operations of the facility, which would employ approximately 610 people, as well as for temporary for construction. The text in Section 3.6.3.1 of the Final EIS has been revised to clarify this.
23	Please include the following (adding FTA if you deem appropriate): "An Executive Order (E.O.) 14096—Revitalizing Our Nation's Commitment to Environmental Justice for All has been recently enacted (April 21, 2023). The new E.O. 14096 on environmental justice does not rescind EO 12898, which FHWA is implementing through the current DOT and FHWA EJ Orders (DOT 5610.2C	Appendix E, Environmental Justice Assessment, of the Final EIS has been revised to acknowledge that EO 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All, does not rescind EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which FTA is implementing through

FHWA (Communication ID 539007)		
Comment ID	Comment Text	Response
	and FHWA 6640.23A) until further guidance is provided regarding the implementation of the new E.O. on environmental justice.”	DOT Order 5610.2C until further guidance is provided regarding the implementation of EO 14096 on environmental justice.
24	It is difficult from any figure to see where the alternatives would intersect the interstate ROW and cross the access line. Does there need to be a figure with that?	The figure in Chapter 2 is intended to be a high-level representation of the project. Please see Appendix C, Conceptual Design Drawings and Engineering Information, which includes the WSDOT Compatibility Line and the I-5 right-of-way.
25	It was not stated in the noise analysis specifically but it may be helpful to the reader and existing residents that the reason why there are so few noise impacts from the new mainline extension and test track to the north is because properties will be acquired for the facility, thus there will be some distance between sensitive receptors and the track. This is not exactly clear as there is no map in the technical report that includes model receptor locations.	As discussed in Section 3.9, Noise and Vibration, the project noise level was determined based on project parameters, such as the speed of the trains, headways and hours of operation, and the distance to sensitive receptors from the tracks. Because several properties would be acquired for the project, and those would be the properties closest to the tracks, the distance between the receptors and tracks is greater than it would be otherwise. The projected noise level was then compared to the existing noise levels to determine whether there would be impacts. Section 3.9.2, Environmental Impacts, in the Final EIS has been updated for clarification. Appendix G2, Noise and Vibration Technical Report, includes figures that show noise impact locations and proposed mitigation associated with the 55 mph Design Option.
26	It is confusing to the reader that existing noise levels in both tables (specifically S 324th Street to Burning Tree Blvd) do not match. Checking this against tables G2.6-10 and G2.6-11 it looks like the difference is between NB and SB locations. Consider adding the track side column to Table 3.9-2 and 3.9-3.	Tables 3.9-2 and 3.9-3 of the Final EIS have been revised to add a column specifying the track side and the distance to the track.
27	“Sound Transit would replace noise walls and berms that would be removed as part of the Preferred And South 344th Street alternatives.” State that this would specifically occur on I-5.	The suggested revision has been made to the Final EIS and to note that Sound Transit would conduct additional noise analysis, as needed, in coordination with WSDOT and Federal Way during final design.
28	It is difficult from any figure to see where the alternatives would intersect the interstate ROW and cross the access line. Does there need to be a figure with that?	The figure in Chapter 2 is intended to be a high-level representation of the project. Please see Appendix C, Conceptual Design Drawings and Engineering Information, which includes the WSDOT Compatibility Line and I-5 right-of-way.
29	Missing discussion that relocation resources are available to all people being relocated without discrimination in compliance with Sound Transit’s Limited English Proficiency Plan.	Section 3.3.4, Sound Transit Acquisition and Relocation Policy Summary has been revised in the Final EIS to include reference to Sound Transit’s Language Assistance Plan.
30	Displacement and relocation really mean the same thing. Displaced person is defined as any person who moves from the real property or moves his or her personal property from the real property. Relocation is provided to displaced persons. This section should really be titled Property Acquisitions and Displacements.	For the purposes of the OMF South EIS analysis, displacements are referring to businesses and residents that would be moved as a result of the project, and relocations are referring to opportunities for businesses, residents, and other property owners to relocate within the same general area. The heading title in the Final EIS has not been changed.

FHWA (Communication ID 539007)		
Comment ID	Comment Text	Response
31	This is really an FTA call however, if this were a WSDOT project, according to WSDOT's ROW manual, environmental reports at this level should not include parcel specific information such as names and possible addresses of potential displacements. This information, if collected, should be kept in a separate project file. The statements should be more general. Instead of calling out Belmor Mobile Home Park, just say mobile home park, GarageTown to storage units, etc..	The level of detail for the potentially affected parcels analysis is standard for Sound Transit projects. Providing this level of affected parcel information is appropriate because it provides adequate notification to potentially affected property owners and discloses the range of effects among project alternatives.
32	I wouldn't refer to this section as "Relocation Opportunities". The section is really talking about property availability for displacements so I would suggest using that title.	Please see response to Comment ID 30.
33	Since CoStar does not collect data on availability for potential replacement sites for religious facilities, what other data collection did you explore, e.g. real estate broker in the local market?	In addition to CoStar, Sound Transit used King County Assessor data and consulted web-based real estate companies for appropriately sized vacant land. Note that most of the potentially affected churches are in commercial or industrial buildings, which are common in the area.
34	This section states that finding properties that have specific needs may be more difficult to find. Missing a discussion of the actions proposed to remedy insufficient replacement sites.	As stated in Section 3.3, Acquisitions, Displacements, and Relocations, of the Final EIS, Sound Transit would follow the procedures outlined in its Property Acquisition and Relocation handbook. Qualified relocation agents are assigned to work with displaced persons throughout the process of locating replacement property and making the transition to the new location. The goal of the relocation agent is to assist the displaced person in locating a replacement site and successfully completing their move.
35	Title of section is "Single-Family Residential" and according the Table 3.3-1 under notes residential displacements include individual apartment/condo units and mobile homes. Based on this "Multi-Family should be added to the title.	The title of Section 3.3.3.2 has been changed to "Residential" in the Final EIS.
36	Suggest changing the sentence from saying displaced residents may have to find a location in a different neighborhood to "a similar neighborhood". A comp from either the same neighborhood or similar neighborhood considered in the same market must be provided to the displaced person before the agency can require them to relocate. Also, mobile home displacements can be challenging as inventory is at an all time low. This section is missing a discussion of the actions proposed to remedy insufficient replacement sites, including housing of last resort.	A different neighborhood was used because, while a comparable sale (comp) in a similar neighborhood would be provided, the resident may elect to move to a different neighborhood. Section 3.3.3.2 has been revised to describe different relocation options available for displaced Belmor residents.

FHWA (Communication ID 539007)		
Comment ID	Comment Text	Response
37	The first sentence is contradictory as prior sections stated that finding properties with unique characteristics, such as has a religious facility, could be more challenging. Also, in the case of the Church on 25 acres, it can be difficult to relocate due to its size. Missing a discussion of the actions proposed to remedy insufficient replacement sites.	Section 3.3.3.3, Religious Facilities, states that there would generally be adequate space available in the study area because the facilities that would be displaced are in commercial or industrial buildings. It also acknowledges an exception to this is Christian Faith Center, which would be more challenging to relocate because of its size. Section 3.3.4, Sound Transit Acquisition and Relocation Policy Summary, summarizes the compensation and services Sound Transit provides. As part of its advisory services to those that are displaced, Sound Transit provides continuing and ongoing information related to available replacement sites as they arise.
38	Suggest changing “relocation opportunities” to “available properties”.	“Relocation opportunities” is the standard terminology Sound Transit uses in its EISs.
39	Not sure if Sound Transit’s procedures allow for the use of a waiver valuation but, if they are going to use a waiver valuation for the TCEs or any other right that fits the criteria then they will want to add waiver valuation discussion to this section.	Use of waiver valuation are typically determined during final design; therefore, they are not identified in the EIS.
40	2nd sentence needs to be changed as it states in addition to compensating owners which can provide the appearance that the additional compensation is only for owners. Since this sentence deals with relocation expenses it should be revised to state other forms of compensation for displacements could include..... Would also suggest changing “support services” to “advisory services”	The Final EIS has been revised to clarify the text per this comment.
41	Typically the property owner will approach the agency to request a hardship acquisition and that has a defined process. An agency can also acquire early when they have the legal right to do so. You might revise to state Sound Transit, with FTA’s approval is considering early acquisition of the four parcels associated with the church parcel, and it could potentially be acquired as a hardship acquisition if the church makes the request and provides the necessary documentation.	The text in Section 3.3.4, Sound Transit Acquisition and Relocation Policy Summary, states that hardship can be used when the property owner can document, based on health, safety, or financial reasons, that remaining in the property poses an undue hardship compared to others. FTA required this documentation to support their approval referenced in the text. The text in this section has been updated in the Final EIS to reflect the Sound Transit Board action to advance the early acquisition of the Christian Faith Center parcels.
42	This statement is incorrect and should be revised to include all displacements. I would suggest removing “Businesses and tenants” to “Displaced persons” since all (business, farm, NPO, PPO, and residential) are included as defined.	The Final EIS has been revised as suggested.
43	Advisory services are applicable to more than just property owners. Sentence should be revised – suggest just removing “to property owners”.	Section 3.3.5, Potential Mitigation Measures (Acquisitions, Displacements, and Relocations), has been updated in the Final EIS to reflect this suggestion.

FHWA (Communication ID 539007)		
Comment ID	Comment Text	Response
44	This is really an FTA call however, if this were a WSDOT project, according to WSDOT's ROW manual, environmental reports at this level should not include parcel specific information such as names and possible addresses of potential displacements. This information, if collected, should be kept in a separate project file. The statements should be more general. Instead of calling out Belmor Mobile Home Park, just say mobile home park, GarageTown to storage units, etc..	The level of detail for the potentially affected parcels analysis is standard for Sound Transit projects. Providing this level of affected parcel information is appropriate because it provides adequate notification to potentially affected property owners and discloses the range of effects among project alternatives.
45	This is really an FTA call however, if this were a WSDOT project, according to WSDOT's ROW manual, environmental reports at this level should not include parcel specific information such as names and possible addresses of potential displacements. This information, if collected, should be kept in a separate project file. The statements should be more general. Instead of calling out Belmor Mobile Home Park, just say mobile home park, GarageTown to storage units, etc..	Please see response to Comment ID 44.
46	Suggest changing "substitute" to "suitable" to be consistent with the other areas you reference suitable for business sites.	The text of the Final EIS has been revised.
47	This is really an FTA call however, if this were a WSDOT project, according to WSDOT's ROW manual, environmental reports at this level should not include parcel specific information such as names and possible addresses of potential displacements. This information, if collected, should be kept in a separate project file. The statements should be more general. Instead of calling out Belmor Mobile Home Park, just say mobile home park, GarageTown to storage units, etc..	Please see response to Comment ID 44.
48	Suggest referring reader to the Acquisition and Displacements section for discussion on the difficulties associated with relocating a church.	The text of the Final EIS has been revised.

November 6th, 2023

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

RE: Operations & Maintenance Facility South, Draft EIS review

The Washington State Department of Transportation (WSDOT) is pleased to provide comments on the Draft Environmental Impact Statement (DEIS) for the Operations and Maintenance South (OMF South) Project.

Some key priorities from the attached Excel comment sheet are listed below:

1. Take inventory of WSDOT owned and managed facilities (i.e., noise walls, utilities, ITS) so we can work together to create avoidance and/or minimization and mitigation plans.
 - a. Please also note the comments focused on maintenance access and plans. We anticipate these will be resolved through an Operations and Maintenance agreement.
2. The South 344th Street alternative shows impacts to a WSDOT BMP. Please coordinate with WSDOT to define any potential impacts and mitigation measures.
3. The WSDOT Triangle Project is mentioned multiple times. Please be aware that this project was recently shelved. Refer to the [project website](#) for more information.
4. Fish passage barriers are noted throughout the document. We recommend adding [WDFW](#) ID numbers and ownership when feasible to help differentiate between locations.
 - a. Additionally, please utilize [this link](#) to access WSDOT's current 2030 fish passage delivery plan.
5. The [2019 Memorandum Of Understanding](#) between Sound Transit and the Department of Ecology explains a difference between projects constructed by 2024 and projects constructed between 2030-2041. How will this apply to OMF South if complete by 2029?

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

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

Sincerely,



Cordy Crockett WSDOT RTCD Director
crocketc@wsdot.wa.gov

cc: Jessica Giblin, WSDOT RTCD Environmental Liaison GiblinJ@WSDOT.WA.GOV

Sound Transit's Operations & Maintenance Facility South Project - Comments from WSDOT's Review of the Draft EIS

Comments Due 11/6/23. Contact Jessica Giblin with questions (giblinj@wsdot.wa.gov)

#	DEIS Chapter	Page	Comment	Reviewer
1	3.11	3.11-8	If the project sites include any WSDOT-managed stormwater facilities, please identify the WSDOT stormwater facilities by creating a summary table if necessary.	K. Shin
2	3.11	3.11-17	Please verify if the WSDOT Highway Runoff Manual should be included to consider LID Design.	K. Shin
3	3.10.1.1	3.10-1	The statement "Based on the anticipated high level of interest from Tribes...biologists conducted formal delineations of the OHWM of tributaries to Hylebos Creek" could be corrected. OHWM delineations are done because of state and federal regulatory requirements, not because of a project's public profile. Is this trying to say delineations were done outside of the study area? If so, suggest clarifying and explain the reasoning.	E. Pizzichemi
4	3.10.1.1	Figure 3.10	How are mature forest and native mature forest classified? Ex: Based on dbh of trees? Please help clarify by defining how these are measured.	E. Pizzichemi
5	3.10.1.1	3.10-5	Consider adding "... biologists evaluated the accessibility of the streams in the study area to <i>salmonids</i> ..." or something similar for clarity.	A. Atkinson
6	3.10.1.3	3.10-8	Similar to comment 3, wetland delineations are not done to alleviate concern, they are done to satisfy federal and state regulatory requirements. The sentence about doing formal delineations because of co-manager concern is not necessary.	E. Pizzichemi
7	3.10.1.3	3.10-8	"The Corps is expected to issue a new rule that will revise the definitions of waters of the US in fall 2023." - Will this paragraph be updated based on this change?	A. Atkinson
8	3.10.2.3	3.10-30	Regarding the classification of impact types - Typically, temporary impacts would need to be less than a year. Saying that forested/woody vegetated wetlands would recover in decades doesn't seem to fit the definition of temporary or long-term temporary.	E. Pizzichemi
9	3.10.3	3.10-32	Please work with the Puyallup Tribe if you're considering mitigation in the Hylebos watershed as the PTOI appreciate large-scale restoration.	E. Pizzichemi
10	3.10.3	3.10-33	Recommend re-checking availability at the Upper Clear Creek mitigation bank again. It may not have space by the time this project gets to permitting. I know the Rule prefer ILF and Banks.	E. Pizzichemi
11	3.8		AQ, GHG Emissions: Include social cost of carbon per the CEQ's 2023 NEPA GHG.	L. Taylor
12	3.2	3.2-22	S 344th Street access appears to be through WSDOT's BMP. How will WSDOT's facility be impacted and then mitigated for? The capacity/function of the WSDOT pond at S.344th St. needs to be maintained. (also in Executive Summary page ES-11).	K. Hall, C. Winningham
13	2	2-8	Because vulnerable communities have been historically impacted by transportation-related projects, recommend providing a concise explanation about how you will "identify potential impacts to neighborhood/community cohesion." The report currently makes some generalizations, but it would be helpful to have more information.	D. Karolczyk
14	2	2-8	Recommend that the report explain how vulnerable communities (e.g., community of color, retirees, Limited English proficient persons), and low-income residing in South 344th Street Preferred Alternative would be impacted. This would give reassurance that protected groups under Title VI of the Civil Rights of 1964 are protected. For example, will this project adhere to the Right-of Way Uniform Act Relocation Assistance? How would this project carry out the relocation assistance advisory program to satisfy FHWA's requirements of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.)?	D. Karolczyk
15	3.1-3.6	3.6.11	Hazardous chemical exposure has been linked to many diseases (cancer, respiratory and heart diseases, among others). The Midway Landfill site is located in the middle of a residential area. If this alternative is chosen, how will the surrounding residents be protected during the cleaning of the site? Additionally, is there any information available to tell the reader what Midway's impact has been on the nearby residents and also the environment?	D. Karolczyk

#	DEIS Chapter	Page	Comment	Reviewer
16	2.5	2.32	In the cost comparison section, it might be worth mentioning that there is a test track in two alternatives, but not in the Midway Landfill option.	C. Crockett, D. Haight
17	Executive Summary	v	The table lists Temporary Construction Easement (SR 99, I-5). Since there probably won't be a lease on SR 99 for the OMF-S project, SR 99 can be removed from the parenthesis. Also, it is called a Temporary Construction Airspace Lease (TCAL) in this situation.	C. Crockett
18	3.15	85	No WSDOT utilities are listed here. Please check this area to confirm there are no stormwater facilities and/or ITS systems that belong to WSDOT.	C. Crockett
19			What would be the impacts to light rail service of building the midway option?	C. Crockett
20	3.7.2.4	21	5th bullet - Luminaires (light (lumen) in the air) is spelled incorrectly. Luminaries refers to people.	C. Winningham
21	Overall		Should state that WSDOT is a willing property seller for the at-grade portions and also a willing leaser for aerial sections, based on a successfully approved Compatibility Report.	D. Haight
22	Overall		If the OMF-S project is adding the work at S 324th then that area should be covered in the environmental document.	D. Haight
23	4.4.8	4-12	This does not discuss if there will be impacts to existing WSDOT noise walls. If so, Sound Transit must mitigate to the satisfaction of the City and replace removed WSDOT noise walls as necessary.	D. Haight
24	Executive Summary	ES-23	Acquisitions, Land Use, and Economics – “However, if the Midway Landfill Alternative were selected to be built, the residential displacements from mainline would still occur as a result of TDLE, subject to environmental review. Therefore, these displacements <i>could</i> ultimately occur regardless of which OMF S alternative is selected.” Should this ‘could’ be changed to ‘would’?	J. Giblin
25	Executive Summary	ES-26	Cumulative Impacts – “In addition, the COFW CCA Project and WSDOT Triangle Project are proposed adjacent to the Preferred and S 344th St alternatives. Both projects are in the early design phase, and neither have guaranteed (<i>construction</i>) funding.” Suggest adding in construction.	J. Giblin
26	Executive Summary	ES-29	Preferred and South 344th St Alternatives – “If the Board were to select <i>the</i> either the Preferred Alternative or South 344th St Alternative...” Suggest removing extra ‘the’.	J. Giblin
27	Throughout		The document states that OMF S will likely open in 2032. The public website ‘timeline and milestones’ page still states 2029. Suggest aligning. https://www.soundtransit.org/system-expansion/operations-maintenance-facility-south/timeline-milestones	J. Giblin
28	1	1-3	Infill stations are mentioned under ‘central corridor’. What is an infill station? Consider defining.	J. Giblin
29	1 and 2 purpose and need		Midway Landfill Alternative: Mentions that public comments showed a heavy desire for this alternative. However, it seems that the landfill alternative doesn’t meet the purpose/need of the project. Was this communicated to the public that desired the Midway alternative? Can it be clarified in this document/will it be clarified in a future document why the Midway alternative is not an appropriate fit? This document explains that the Midway alternative has no impacts to homes, businesses, and low impacts to ecological resources, where the other alternatives have higher impacts to each of those resources. It would be helpful to include an explanation behind the reasoning for not going with the Midway Alternative.	J. Giblin, D. Haight
30	3.10	figures 3.10-1 and others	Wetlands and streams are shown in detail, so we suggest showing fish passage barriers with their WDFW IDs.	J. Giblin
31	3.10	3.10-16	Paragraph about a barrier but no number to define it. Could also state the owner.	J. Giblin
32	3.10	3.10-5	Mentions Federal Way City code stream type – suggest a table to show the code and the different corresponding categories.	J. Giblin
33	3.10	Table 3.10-1	Show buffers and consider adding which code is being followed (COFW, Kent, or state?).	J. Giblin

#	DEIS Chapter	Page	Comment	Reviewer
34	3.10	3.10-5	Mentions WSDOT developing plans to correct barriers. The Triangle Project (which was going to include these barriers) is now shelved, so this could be rephrased.	J. Giblin
35	3.10	3.10-9	Notes that the WSDOT 509 project previously delineated a wetland, but no source is provided. Should this report be cited?	J. Giblin
36	3.10	3.10.2.1	No build alternative – “FWLE will temporarily impact a wetland buffer within the Midway Landfill Alternative area.” Isn’t FWLE almost complete? Should this read ‘FWLE temporarily <i>impacted</i> ...’	J. Giblin
37	3.10	3.10-11	Mentions CWA Section 404 permit but does not specify regulatory agency that issues permit.	J. Giblin
38	3.10	3.10-130	“Under any of the build alternatives, runoff from impervious surfaces, including PGIS would be detained and treated in accordance with local, state, and federal requirements.” Consider referencing the ST/Ecology 2019 MOU and any updates available since: https://www.soundtransit.org/st_sharepoint/download/sites/PRDA/FinalRecords/2019/Motion%20M2019-111.pdf	J. Giblin
39	3.11	3.11-9; 2.11.2.2	Long-term impacts – notes the 2019 MOU that calls out projects completed between 2030-2041. However, the MOU also says that projects completed by 2024 don’t apply. It does call out TDLE as a project that will have to follow the MOU. OMF S was originally a part of TDLE, but it’s not clear now where OMF S lies now in relation to this MOU. Could you explain where OMF S falls in relation to this MOU?	J. Giblin
40	3.11	3.11-1	BMP should be defined at first use.	J. Giblin
41	3.11	3.11-19	Preferred alternative – “...serves as an in-line stormwater detention facility.” Suggested adding ownership here. Will you coordinate with the State or City if it’s owned by another entity than ST?	J. Giblin
42	3.14	3.14-8	Public services, preferred alternative – “if the facility is relocated, some students would likely have to travel farther to school. If the school discontinues operations, the approximately 312 students would either need to enroll in another private school or enter the public school system.” However, no mitigation is noted for this impact. Could you explain why nothing is needed here?	J. Giblin
43	4	Table 4.3-1	States that ST FWLE project will be completed in 2024. I believe this changed to 2026.	J. Giblin
44	4	Table 4.3-1	COFW CCA Project. Could add this has no construction funding. Could add more detail than TBD if desired to WSDOT Triangle Project (website says 'project suspended, no date for resumption scheduled').	J. Giblin
45	4	4-7	“In conjunction with this project, WSDOT is proposing to make fish passage improvements that would remove a portion of parking spaces in the FW/S 320th St Park & Ride. This would could start as early as 2024.” Suggest defining which project (COFW CCA, ST OMF S, WSDOT Triangle) and adding WDFW ID numbers to help clarify. Also, the current schedule of these WSDOT barrier corrections can be verified using the 2030 plan here: https://wsdot.wa.gov/sites/default/files/2023-08/Env-FishPassage-KingSnohomishIsland-table.pdf .	J. Giblin

WSDOT (Communication ID 539078)		
Comment ID	Comment Text	Response
1	<p>Take inventory of WSDOT owned and managed facilities (i.e., noise walls, utilities, ITS) so we can work together to create avoidance and/or minimization and mitigation plans.</p> <p>a. Please also note the comments focused on maintenance access and plans. We anticipate these will be resolved through an Operations and Maintenance agreement.</p>	<p>After the Sound Transit Board selects the project to be built, Sound Transit staff will create a complete inventory of all WSDOT-managed facilities that could be potentially affected by the project to inform the development of an Operations and Maintenance agreement between the two agencies.</p>
2	<p>The South 344th Street alternative shows impacts to a WSDOT BMP. Please coordinate with WSDOT to define any potential impacts and mitigation measures.</p>	<p>Staff from Sound Transit and the consultant design team have had a series of meetings with WSDOT to discuss potential impacts to WSDOT's stormwater detention pond located near the southeast corner of the South 344th Street Alternative. If this alternative is selected as the project to be built, this coordination will continue.</p>
3	<p>The WSDOT Triangle Project is mentioned multiple times. Please be aware that this project was recently shelved. Refer to the project website for more information.</p>	<p>The Final EIS has been revised to reflect this comment.</p>
4	<p>Fish passage barriers are noted throughout the document. We recommend adding WDFW ID numbers and ownership when feasible to help differentiate between locations.</p> <p>a. Additionally, please utilize this link to access WSDOT's current 2030 fish passage delivery plan.</p>	<p>Thank you for the link to WSDOT's 2030 fish passage delivery plan. WDFW ID numbers and have been added to Figures 3.10-1 through 3.10-3.</p>
5	<p>The 2019 Memorandum Of Understanding between Sound Transit and the Department of Ecology explains a difference between projects constructed by 2024 and projects constructed between 2030-2041. How will this apply to OMF South if complete by 2029?</p>	<p>The footnote has been revised to correct the OMF South completion date to 2032.</p>
6	<p>If the project sites include any WSDOT-managed stormwater facilities, please identify the WSDOT stormwater facilities by creating a summary table if necessary.</p>	<p>Sound Transit will identify specific WSDOT stormwater facilities that could be affected during final design and coordinate with WSDOT as needed.</p>
7	<p>Please verify if the WSDOT Highway Runoff Manual should be included to consider LID Design.</p>	<p>Because OMF South is not a WSDOT facility, Sound Transit would not be required to follow WSDOT's Highway Runoff Manual, which provides guidance to direct the planning and design of stormwater management facilities for existing and new Washington State highways, rest areas, park-and-ride lots, ferry terminals, and highway maintenance facilities throughout the state. The Highway Runoff Manual establishes minimum requirements and provides uniform technical guidance in a similar manner to Sound Transit design standards and Ecology requirements.</p>
8	<p>The statement "Based on the anticipated high level of interest from Tribes...biologists conducted formal delineations of the OHWM of tributaries to Hylebos Creek" could be corrected. OHWM delineations are done because of state and federal regulatory requirements, not because of a project's public profile. Is this trying to say delineations were done outside of the study area? If so, suggest clarifying and explain the reasoning.</p>	<p>Formal surveyed delineations are not typically completed until after the NEPA/SEPA environmental review process has been completed, an alternative selected, and permit applications are being prepared. Sound Transit chose to survey ecosystem resources earlier in the process to both aid in design (thereby avoiding and/or minimizing impacts) and to inform the discussion with Tribes,</p>

WSDOT (Communication ID 539078)		
Comment ID	Comment Text	Response
		resource agencies, and the public. The text of the Final EIS has been revised to clarify this.
9	How are mature forest and native mature forest classified? Ex: Based on dbh of trees? Please help clarify by defining how these are measured.	Appendix G2, Ecosystem Resources Technical Report, explains the difference between the forest vegetation types, which are non-native forest, mature native forest, and other native forest, following the WDFW vegetation classification system. Non-native forests are typically plantings of horticultural species as part of residential or commercial development. Mature native forest stands are generally over 80 years old, with trees exceeding 21 inches in diameter at breast height, on average (WDFW 2008). These forests are dominated by Douglas-fir, western redcedar, western hemlock, and black cottonwood and provide structurally complex habitat with more biological diversity and higher habitat value. The other native forest land cover type represents forests dominated by native tree species but lacking the defining features of mature forest.
10	Consider adding "... biologists evaluated the accessibility of the streams in the study area <i>to salmonids</i> ..." or something similar for clarity.	This sentence in the Final EIS has been revised for clarity.
11	Similar to comment 3, wetland delineations are not done to alleviate concern, they are done to satisfy federal and state regulatory requirements. The sentence about doing formal delineations because of co-manager concern is not necessary.	See response to Comment ID 8.
12	"The Corps is expected to issue a new rule that will revise the definitions of waters of the US in fall 2023." – Will this paragraph be updated based on this change?	Effective September 8, 2023, EPA and the U.S. Army Corps of Engineers published their amendments to the Revised Definition of Waters of the United States. The Final EIS includes this update.
13	Regarding the classification of impact types – Typically, temporary impacts would need to be less than a year. Saying that forested/woody vegetated wetlands would recover in decades doesn't seem to fit the definition of temporary or long-term temporary.	Temporary impacts to forested wetlands that result in loss of trees are considered long-term temporary impacts because they can be restored over time. During permit review, resource agencies and Tribes may require specific mitigation to offset this loss.
14	Please work with the Puyallup Tribe if you're considering mitigation in the Hylebos watershed as the PTOI appreciate large-scale restoration.	Appendix B, Public Involvement and Agency Coordination, includes discussion of Sound Transit's outreach to the Puyallup Tribe of Indians and the Muckleshoot Indian Tribe regarding potential impacts to ecosystem resources.
15	Recommend re-checking availability at the Upper Clear Creek mitigation bank again. It may not have space by the time this project gets to permitting. I know the Rule prefer ILF and Banks.	The referenced statement in the Draft EIS was noting the existence of wetland mitigation banks and in-lieu fee programs that could be available for projects within the OMF South study area. Sound Transit would assess availability during the mitigation design and permitting process.
16	AQ, GHG Emissions: Include social cost of carbon per the CEQ's 2023 NEPA GHG.	The social cost of GHG emissions has been calculated for the Final EIS and is included in Section 3.8, Air Quality and Greenhouse Gas Emissions.
17	S 344th Street access appears to be through WSDOT's BMP. How will WSDOT's facility be impacted and then mitigated for? The capacity/function of the WSDOT pond	The main employee access for the South 344th Street Alternative is just west of the S 344th Street/18th Place S intersection. It would not impact WSDOT's stormwater pond near S 344th Street and I-5.

WSDOT (Communication ID 539078)		
Comment ID	Comment Text	Response
	at S.344th St. needs to be maintained. (also in Executive Summary page ES-11).	
18	Because vulnerable communities have been historically impacted by transportation-related projects, recommend providing a concise explanation about how you will “identify potential impacts to neighborhood/community cohesion.” The report currently makes some generalizations, but it would be helpful to have more information.	This comment was made on Table 2.2-3, Evaluation Criteria, Measures, and Methods. The table describes the criteria used in the evaluation of the original 20 potential OMF South sites. The referenced OMF South Alternatives Evaluation Technical Memorandum describes the high-level assessment this criterion and others received to rank the original list of possible alternative sites. Sites that would alter major features and functions important to neighborhood/community cohesion or affect areas where low-income or minority populations are prevalent were assigned the number 1. A ranking of 2 meant that the site would alter some features and functions; 3 indicated that no features and functions would be affected. Once the sites were narrowed to the three analyzed in the Draft EIS during the SEPA scoping process, Sound Transit and FTA conducted a thorough assessment of impacts, which can be found in Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods. Additional information can be found in Appendix E, Environmental Justice Assessment.
19	Recommend that the report explain how vulnerable communities (e.g., community of color, retirees, Limited English proficient persons), and low-income residing in South 344th Street Preferred Alternative would be impacted. This would give reassurance that protected groups under Title VI of the Civil Rights of 1964 are protected. For example, will this project adhere to the Right-of Way Uniform Act Relocation Assistance? How would this project carry out the relocation assistance advisory program to satisfy FHWA’s requirements of Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.)?	Please see response to Comment ID 18. Sound Transit published a Title VI Facility Equity Analysis independent of the EIS in November 2021. Prior to the Sound Transit Board action to select the project to be built, Sound Transit plans to publish an addendum to the Title VI Facility Equity analysis to reflect project changes since the 2021 analysis.
20	Hazardous chemical exposure has been linked to many diseases (cancer, respiratory and heart diseases, among others). The Midway Landfill site is located in the middle of a residential area. If this alternative is chosen, how will the surrounding residents be protected during the cleaning of the site? Additionally, is there any information available to tell the reader what Midway’s impact has been on the nearby residents and also the environment?	Section 3.13, Hazardous Materials, includes information on the Midway Landfill, its Superfund status, the cleanup activities, and the ongoing monitoring actions. Potential impacts and proposed mitigation associated with removing materials from the landfill are also discussed.
21	In the cost comparison section, it might be worth mentioning that there is a test track in two alternatives, but not in the Midway Landfill option.	A footnote has been added to Table 2.5-1, Opinion of Probable Cost for Preliminary Engineering Design of the Build Alternatives, of the Final EIS to reflect this comment.
22	The table lists Temporary Construction Easement (SR 99, I-5). Since there probably won’t be a lease on SR 99 for the OMF-S project, SR 99 can be removed from the parenthesis. Also, it is called a Temporary Construction Airspace Lease (TCAL) in this situation.	If the Midway Landfill Alternative is selected as the project to be built, this approval may be necessary for SR 99. The Fact Sheet for the Final EIS has been revised to state the correct title of the approval.

WSDOT (Communication ID 539078)		
Comment ID	Comment Text	Response
23	No WSDOT utilities are listed here. Please check this area to confirm there are no stormwater facilities and/or ITS systems that belong to WSDOT.	The analysis considers WSDOT stormwater facilities in Section 3.11, Water Resources. As WSDOT is not typically considered a utility provider, its facilities were not considered in Section 3.15, Utilities, Energy and Electromagnetic Fields, which addresses consumer-oriented utilities.
24	What would be the impacts to light rail service of building the midway option?	FWLE will be operational at the time of OMF South construction. If the Midway Landfill Alternative is selected as the project to be built, there would be some disruption of service in order to connect the lead tracks of the OMF to the mainline. Section 3.2.2.3, Construction Impacts (to Transportation), and Section 4.3.3.5 in Appendix G1, Transportation Technical Report, of the Final EIS have been revised to clarify this.
25	5th bullet -Luminaires (light (lumen) in the air) is spelled incorrectly. Luminaries refers to people.	The Final EIS has been revised to reflect this comment.
26	Should state that WSDOT is a willing property seller for the at-grade portions and also a willing leaser for aerial sections, based on a successfully approved Compatibility Report.	The Final EIS acknowledges WSDOT's role as a potential property seller and leaser. Sound Transit appreciates WSDOT's cooperation on this project and looks forward to continuing to coordinate through project design and construction.
27	If the OMF-S project is adding the work at S 324th then that area should be covered in the environmental document.	The project study area used for analysis in the Draft EIS covers the entire geographic area potentially affected by the proposed OMF South. The City of Federal Way is preparing separate environmental documentation for the City Center Access project at S 324th Street.
28	This does not discuss if there will be impacts to existing WSDOT noise walls. If so, Sound Transit must mitigate to the satisfaction of the City and replace removed WSDOT noise walls as necessary.	Potential impacts to noise walls are discussed in Final EIS Section 3.9, Noise and Vibration, under Section 3.9.2.2, Long-Term Impacts, Preferred Alternative.
29	Acquisitions, Land Use, and Economics – “However, if the Midway Landfill Alternative were selected to be built, the residential displacements from mainline would still occur as a result of TDLE, subject to environmental review. Therefore, these displacements could ultimately occur regardless of which OMF S alternative is selected.” Should this ‘could’ be changed to ‘would’?	The use of “could” in this case is correct, as an OMF South alternative has not yet been selected for construction and TDLE has not completed its environmental review and includes consideration of a No-Build Alternative.
30	Cumulative Impacts – “In addition, the COFW CCA Project and WSDOT Triangle Project are proposed adjacent to the Preferred and S 344th St alternatives. Both projects are in the early design phase, and neither have guaranteed (construction) funding.” Suggest adding in construction.	The Final EIS has been revised to reflect this comment.
31	Preferred and South 344th St Alternatives – “If the Board were to select the either the Preferred Alternative or South 344th St Alternative...” Suggest removing extra ‘the’.	The Final EIS has been revised to reflect this comment.
32	The document states that OMF S will likely open in 2032. The public website ‘timeline and milestones’ page still states 2029. Suggest aligning. https://www.soundtransit.org/system-expansion/operations-maintenance-facility-south/timeline-milestones	The project website has been updated to reflect a forecasted in-service date of 2032. Consistent with the EIS, it also states that Sound Transit is pursuing measures to advance the opening earlier. Additionally, if the Midway Landfill Alternative is selected to be built the

WSDOT (Communication ID 539078)		
Comment ID	Comment Text	Response
		opening date would be between 2035 and 2037, depending on the subsurface construction design option.
33	Infill stations are mentioned under 'central corridor'. What is an infill station? Consider defining.	An infill station is a new station built on an existing light rail line. This definition has been added to the Final EIS.
34	Midway Landfill Alternative: Mentions that public comments showed a heavy desire for this alternative. However, it seems that the landfill alternative doesn't meet the purpose/need of the project. Was this communicated to the public that desired the Midway alternative? Can it be clarified in this document/will it be clarified in a future document why the Midway alternative is not an appropriate fit? This document explains that the Midway alternative has no impacts to homes, businesses, and low impacts to ecological resources, where the other alternatives have higher impacts to each of those resources. It would be helpful to include an explanation behind the reasoning for not going with the Midway Alternative.	The 2021 Draft EIS and 2023 NEPA Draft/SEPA Supplemental Draft EIS and related community engagement materials identify the tradeoffs of the alternatives studied in the EIS. This includes identifying the schedule, cost, and transit impacts of the Midway Landfill Alternative. The Sound Transit Board identified the South 336th Street Alternative as the Preferred Alternative in 2021. The Preferred Alternative represents a preference based on information currently available. After the Final EIS is published, the Board will consider the Draft EIS public comments, Final EIS analysis, and other factors prior to the selection of the project to be built.
35	Wetlands and streams are shown in detail, so we suggest showing fish passage barriers with their WDFW IDs.	The Final EIS has been revised to include the WDFW fish passage barrier ID numbers.
36	Paragraph about a barrier but no number to define it. Could also state the owner.	The Final EIS has been revised to add the WDFW ID number (933224) and ownership (City of Federal Way) for the culvert described.
37	Mentions Federal Way City code stream type – suggest a table to show the code and the different corresponding categories.	Since all of the streams described in the Final EIS are considered Type F for potential fish habitat, a new table has not been added. The city of Federal Way has adopted Washington Department of Natural Resources' water typing system in its entirety. The Final EIS has been updated to refer to the appropriate city code section for stream typing for the reader's reference.
38	Show buffers and consider adding which code is being followed (COFW, Kent, or state?).	Potential long-term impacts to stream buffers are included in Table 3.10-1, and potential construction-related stream buffer impacts are listed in Table 3.10-5. As the Midway Landfill Alternative has no stream impacts, all potential impacts identified in the Final EIS are in Federal Way.
39	Mentions WSDOT developing plans to correct barriers. The Triangle Project (which was going to include these barriers) is now shelved, so this could be rephrased.	The text of the Final EIS in Section 3.10, Ecosystem Resources, has been revised to reflect this comment.
40	Notes that the WSDOT 509 project previously delineated a wetland, but no source is provided. Should this report be cited?	Wetland WL148.67L is a small, depressional wetland located in the WSDOT right-of-way of southbound I-5. It was delineated in April 2019 by Anchor QEA as a component of the SR 509 Completion Stage 1B Project (Anchor 2019). The reference has been added to the Final EIS.
41	No build alternative – "FWLE will temporarily impact a wetland buffer within the Midway Landfill Alternative area." Isn't FWLE almost complete? Should this read 'FWLE temporarily impacted...'	The comment is correct, and the Final EIS has been revised.

WSDOT (Communication ID 539078)		
Comment ID	Comment Text	Response
42	Mentions CWA Section 404 permit but does not specify regulatory agency that issues permit.	The Anticipated or Potential Licenses, Permits, and Approvals in the Fact Sheet identifies the U.S. Army Corps of Engineers as the issuing agency of the CWA Section 404 approval.
43	“Under any of the build alternatives, runoff from impervious surfaces, including PGIS would be detained and treated in accordance with local, state, and federal requirements.” Consider referencing the ST/Ecology 2019 MOU and any updates available since: https://www.soundtransit.org/st_sharepoint/download/sites/PRDA/FinalRecords/2019/Motion%20M2019-111.pdf	Section 3.11, Water Resources, includes a footnote summarizing the memorandum of understanding (MOU) between Ecology and Sound Transit.
44	Long-term impacts – notes the 2019 MOU that calls out projects completed between 2030-2041. However, the MOU also says that projects completed by 2024 don't apply. It does call out TDLE as a project that will have to follow the MOU. OMF S was originally a part of TDLE, but it's not clear now where OMF S lies now in relation to this MOU. Could you explain where OMF S falls in relation to this MOU?	Sound Transit is considering OMF South as a project covered by the MOU.
45	BMP should be defined at first use.	The first use of BMP in the document is in Section 3.2, Transportation, where it is defined.
46	Preferred alternative – “...serves as an in-line stormwater detention facility.” Suggested adding ownership here. Will you coordinate with the State or City if it's owned by another entity than ST?	The facility is owned by Federal Way and has been the subject of ongoing coordination between the city and Sound Transit.
47	Public services, preferred alternative – “if the facility is relocated, some students would likely have to travel farther to school. If the school discontinues operations, the approximately 312 students would either need to enroll in another private school or enter the public school system.” However, no mitigation is noted for this impact. Could you explain why nothing is needed here?	As a business, the Pacific Christian Academy would be eligible for relocation assistance if the Preferred Alternative is selected as the project to be built. Based on recent coordination with Pacific Christian Academy, it is anticipated that the school would relocate. If that is not possible, there are several other private Christian schools in south King County, including Evergreen Christian in Federal Way and Seattle Christian in SeaTac.
48	States that ST FWLE project will be completed in 2024. I believe this changed to 2026.	The completion date for FWLE has been updated to 2026 in the Final EIS.
49	COFW CCA Project. Could add this has no construction funding. Could add more detail than TBD if desired to WSDOT Triangle Project (website says 'project suspended, no date for resumption scheduled').	The suggested revisions have been made to Table 4.3-1 of the Final EIS.
50	“In conjunction with this project, WSDOT is proposing to make fish passage improvements that would remove a portion of parking spaces in the FW/S 320th St Park & Ride. This would could start as early as 2024.” Suggest defining which project (COFW CCA, ST OMF S, WSDOT Triangle) and adding WDFW ID numbers to help clarify. Also, the current schedule of these WSDOT barrier corrections can be verified using the 2030 plan here: https://wsdot.wa.gov/sites/default/files/2023-08/Env-FishPassage-KingSnohomishIsland-table.pdf .	Information regarding culvert ID numbers and ownership related to Federal Way's City Center Access Project has been added to Table 4.4-1 of the Ecosystem Resources section of Chapter 4, Cumulative Effects Analysis, of the Final EIS.



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

November 6, 2023

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
OMFSouthDEIS@soundtransit.org

RE: Sound Transit Operations and Maintenance Facility – South NEPA/SEPA Supplemental 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 Operations and Maintenance Facility South (OMF South). As you are aware, two of three sites that Sound Transit is considering are within the City of Federal Way. We have appreciated the collaborative nature of the relationship Sound Transit staff looks to have with the City.

The City has taken an official position on the OMF South in the previous SEPA DEIS and in a previously provided letter signed by the Mayor and full City Council dated April 6, 2021, and technical comment letter dated April 19, 2021. Both letters and supplemental comments are attached with this letter and are still valid and incorporated by reference.

Alternatives Considered

Page 2-16

- How can environmental impacts from TDLE be considered part of the "no-build" alternative if TDLE does not have an approved environmental document?

Transportation Impacts

The Following Comments are related to the main EIS document and pertain to transportation impacts.

Page 3.2-8

- 20th Avenue S is listed incorrectly as 20th Avenue E. Please address.

Page 3.2-12

- Historical collision data was collected between January 2016 to December 2018. This should be updated with more current data.
- Intersections with a collision rate above 1.0 per MEV will need to be discussed in greater detail as to potential contributing factors.
- Additionally, the societal cost per MEV must be provided in the collision summary tables and discussed.

Page 3.2-13

- It is noted that the annual growth rate is based on the growth rate used for TDLE traffic studies, but please specify what the basis for the assumed TDLE annual growth rate was. Typically, a higher annual growth rate closer to 1.25 percent has been used in the City of Federal Way.
- Was this signal timing optimization vetted with WSDOT and/or City of Federal Way? Are there other external factors outside of the study area that would impact the ability to optimize the signal timings?

Page 3.2-14

- Routes 177 and 577 would still be faster than light rail for several years, so there will be opposition to discontinuing those routes.

Page 3.2-16

- A more comprehensive trip generation section needs to be provided in this report. The appendices do not include detailed calculations and the methodology outlined here does not match with the methodology outlined in the appendices (i.e. trip generation does not appear to account for delivery-related trips or other non-employee trips).
- Given that this is a long-range analysis, and that the evaluated alternatives result in major changes to the roadway network, it is not appropriate to base trip distribution assumptions on existing travel patterns alone. Trip distribution patterns should be based on the regional travel model and adjusted as needed based on changes to the roadway network.

Page 3.2-17

- It cannot be definitely stated that no new safety issues would be introduced and no existing safety issues would be exacerbated. Particularly given the elimination of north-south connectivity for non-motorized traffic in the South 344th Street Alternative.
- The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.

Page 3.2-18

- The description of the new 18th Avenue S intersection is not consistent with the provided site plan. The description and if applicable, the associated analysis, should be updated.
- Parking study needs to be updated from the FWLE EIS to be consistent with ability to remove stalls without replacement.
Does this include stalls removed for S324th culvert and roadway grade construction?

Page 3.2-19 – Table 3.2-6

- v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

- Intersection 10 (SR 99/Driveway) is no longer proposed as part of the preferred alternative.
- Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-6. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Page 3.2-20 – Table 3.2-7

- v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.
- 55 seconds of delay would typically indicate LOS E conditions. Without Synchro worksheets provided, it cannot be definitely confirmed that there are no impacts at this intersection. Please clarify.
- Intersection 10 (SR 99/Driveway) is no longer proposed as part of the preferred alternative.
- Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-7. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Page 3.2-21 and page 3.2-25 - Figure 3.2-7 and Figure 3.2-8

- This figure should indicate the new roadway extensions that are part of the preferred alternative. Additionally, new intersections and site driveways must be included in the analysis and shown on the figure.

Page 3.2-22

- The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.

Page 3.2-23 and page 3.2-24 - Table 3.2-8 and Table 3.2-9

- v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

- If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.

Page 3.2-26

- This would have a significant impact as a north-south bicycle connection would not be possible and the majority of injury-related crashes involved ped and cyclists along SR 99.

Page 3.2-32 – Table 3.2-13

- S 330th St is inappropriate for a haul route, as it is narrow, has a small traffic circle at 20th Ave S, and traverse's residential areas with some areas of high parking utilization.

Page 3.2-13

- In addition to the impacts of truck activity, the impacts of trips related to workers traveling to and from the site should be quantified and discussed.
- Please clarify how many workers would be traveling to and from the site and if there would be sufficient parking on-site for all workers to park.

Page 3.2-35

- S 330th St is not an acceptable haul route.

Page 3.2-42

- Consistent with the executive summary, the City's street vacation process should be referenced as an ongoing coordination effort related to the reconfiguration of the street network for both Federal Way alternatives.

The following comments are related to Appendix C

Page 1

- Additional support information is needed related to access for the proposed driveways for the midway landfill alternative. Support information for the proposed driveway widths and geometry is needed. Channelization and median improvements are needed on Pacific Hwy to support the new accesses.

Page 11

- The location of the track over/across the parking lot may impact the existing parking lot illumination. Evaluation and potential mitigation are needed as necessary.

Page 12

- The location of the track over/across the parking lot may impact the existing parking lot illumination. Evaluation and potential mitigation are needed as necessary.
- Location of track over/across S 322nd St may impact driver visibility of existing traffic signal at S 322nd St/23rd Ave S intersection. Evaluate and mitigate, if needed.
- Location of track over/across 23rd Ave S may impact driver visibility of traffic signal at S 322nd St/23rd Ave S intersection. Evaluate and mitigate, if needed.

Page 15

- Set gate further from 24th Ave S so that access ST maintenance vehicles can pull completely out of the roadway when opening the gate.
- Clarity is needed for a section of asphalt shown on the plans along 24th Avenue S near S 333rd St.

Page 16

- A proposed column is shown within the intersection of Winged Foot Way and Burning Tree Blvd. A revised location shall be provided.

Page 17 and Page 19

- Adjustment to the location of the proposed sidewalk, curb, and landscape strip for 24th Ave S is required.

Page 22

- Adjustment is needed for the access to the WSDOT stormwater facility at 21st Ave S and S 344th St. Update design to represent the intended roadway curve. Revise the access to driveway standards.

Page 25

- A 10-foot clear zone is required from roadway edge to face of proposed retaining walls.

Page 27

- On-street parking is shown along the proposed 18th Place S. On-street parking is allowed provided that it is outside the prescriptive sight triangle of the intersection and does not result in impacts to adjacent critical areas.
- S 341st Place is incorrectly shown as S 340th St. Please correct.

Page 34

- The location of the track over/across the parking lot may impact the existing parking lot illumination. Evaluation and potential mitigation are needed as necessary.

Page 37

- More evaluation is needed for access needs for existing properties adjacent to the proposed S 344th St Site alternative.
- Additional sidewalk connectivity is needed for a portion of the removed S 341st Place.

The following comments are related to Appendix G1

Overall Comments:

The analysis provided does not adequately analyze the preferred and 344th Street alternatives as not all new driveways/intersections are included and/or incorrect driveways are included. Additionally, v/c must be recorded for all intersections including those along State Routes as the City of Federal Way controls these intersections.

There is insufficient information provided related to the existing land uses removed and traffic rerouted as a result of vacated streets. Supplemental trip generation analysis and volume figures should be provided to illustrate how these conditions impact the future volumes.

Without this information it is not possible to validate the future volumes provided. Additional attachments must be provided including detailed trip generation information for the OMF South site and existing land uses; traffic counts; and Synchro worksheets.

An updated parking analysis for the WSDOT 320th/23rd Ave park and ride needs to be completed to support removal of parking spaces consistent with the FWLE EIS that assumed use of this park and ride for LINK/Regional Transit riders.

Page G1-i

- The summary states that impacts may occur if the delay in an LOS F condition is worsened by more than 10 seconds. Please clarify the basis for this standard as it is not specified in Attachment A. Additionally, the City of Federal Way standards should be referenced here since they are based on v/c rather than LOS/delay.

Page G1-3 – Figure G1.1-2

- The extension of 18th Place S is described as intersection S 336th Street as the fourth (NB) leg of the 18th Ave S/S 336th St intersection, but the conceptual site plan does not depict it in this way due to the creek. It is assumed that a four-leg intersection is not feasible here and therefore the description/analysis should be revised accordingly.

Page G1-20

- In section 3.2.3 Traffic Volumes, please clarify what "as applicable" means for the adjusted 2022 traffic volumes. For instance, was volume balancing between intersections a key factor?

Page G1-21 – Figure G1.3-7

- During the AM peak hour, existing volumes at intersections 6 and 9 have decreased as compared to the 2021 DEIS resulting in greater volume imbalances between intersections in some cases. Please explain the change from the 2021 DEIS to the 2023 ADEIS.

Page G1-29, G1-31, G1-58, and G1-60 – Table G1.3-9, Table G1.3-11, Table G1.4-1, and Table G1.4-3

- v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

Page G1-44

- Under section 3.7 Safety, while it is acceptable to use collision data from 2016 to 2018 because collision data during the pandemic was atypical, many studies have found that collision rates were higher during the pandemic. Therefore, it may not be accurate to say that 2016 to 2018 collision data is more conservative.

Page G1-55

- Intersections with a collision rate above 1.0 per MEV will need to be discussed in greater detail as to potential contributing factors.

Additionally, the societal cost per MEV must be provided in the collision summary tables and discussed.

Page G1-54

- Under section 4.1.1.2 Traffic Volumes, it is noted that the annual growth rate is based on the growth rate used for TDLE traffic studies, but please specify what the basis for the assumed TDLE annual growth rate was. Typically, a higher annual growth rate closer to 1.25 percent has been used in the City of Federal Way.

Page G1-55

- In the 2042 PM analysis there is a mention of a decrease in delay due to signal optimization. Was this signal timing optimization vetted with WSDOT and/or City of Federal Way? Are there other external factors outside of the study area that would impact the ability to optimize the signal timings? Additionally, you cannot look at one SR-99 intersection in a vacuum as the entire corridor is coordinated.

Page G1-68

- Given that this is a long-range analysis, and that the evaluated alternatives result in major changes to the roadway network, it is not appropriate to base trip distribution assumptions on existing travel patterns along. Trip distribution patterns should be based on the regional travel model and adjusted as needed based on changes to the roadway network.

Page G1-69

- A more comprehensive trip generation sections needs to be provided in this report. The appendices do not include detailed calculations and the methodology outlined here does not match with the methodology outlined in the appendices (i.e. trip generation does not appear to account for delivery-related trips or other non-employee trips).

Page G1-70

- Under section 4.2.1.5 Parking, please specify the approximate number of parking spaces this represents for each alternative.

Page G1-71

- Under section 4.2.1.6 Safety, this section should address the intersections with a collision rate over 1.0 collisions per MEV and discuss how the project may impact these locations. Additionally, if north-south non-motorized facilities would not be feasible as part of the 344th Street Alternative, safety would not improve for non-motorized users and could in fact worsen. Please elaborate.

Page G1-72

- The City of Federal Way's street vacation process should be referenced for both City of Federal Way alternatives as it relates to the currently proposed roadway network and potential ongoing coordination.
- In section 4.2.2.1 regarding the extension of 18th Place S there is a section indicating that it would convert the existing S 336th St/18th Avenue S intersection into a four-legged intersection. This is not consistent with the provided site plan. The description and if applicable, the associated analysis should be updated.
- Information regarding existing land uses to be removed and associated trip generation projections for those uses need to be provided in section 4.2.2.2 Traffic Volumes.

Page G1-73 – Figure G1.4-7

- In addition to trip assignment, trip distribution figures should be included. Alternatively, trip distribution percentages could be illustrated on this figure (Figure G1.4-7).
- This figure should indicate new roadway extensions that are part of the preferred alternative.
- This figure shows intersection 10 as a new intersection, but intersection 10 no longer exists as part of the preferred alternative site plan based on Figure G1.1-2 and the roadway network description. If this driveway no longer exists, the volumes going through this intersection would need to be routed to other site access points and other study area intersections.

Additionally, this figure does not show intersection 11 (18th Place S Extension/S 336th Street), but intersection is included in the LOS tables. Finally, the intersections of 21st Avenue S/S 341st Place and 21st Avenue S Extension/S 344th Street should be included in the analysis as well as future volume figures.

Overall, the analysis provided does not sufficiently analyze the operational impacts of the preferred alternative.

Page G1-74 – Figure G1.4-8

- This figure should indicate new roadway extensions that are part of the preferred alternative.
- This figure shows intersection 10 as a new intersection, but intersection 10 no longer exists as part of the preferred alternative site plan based on Figure G1.1-2 and the roadway network description. If this driveway no longer exists, the volumes going through this intersection would need to be routed to other site access points and other study area intersections.

Additionally, this figure does not show intersection 11 (18th Place S Extension/S 336th Street), but intersection is included in the LOS tables. Finally, the intersections of 21st Avenue S/S 341st Place and 21st Avenue S Extension/S 344th Street should be included in the analysis as well as future volume figures.

It is also not clear how the rerouted vehicles from roadway closures are accounted for. For example, the no-build conditions show 85 vehicles exiting 20th Avenue S during the PM peak hour. However, there are only 15 additional right turns at intersection 1 and no additional left turns beyond project trips. While volumes for intersection 11 are not shown, based on the future volumes at intersection 1, it does not appear that additional trips are routed to intersection 11. If these trips would no longer exist due to land uses being removed, it is not clear from this analysis as no trip generation for existing land uses to be removed is provided. A figure showing how existing traffic was removed and rerouted should be included.

Overall, the analysis provided does not sufficiently analyze the operational impacts of the preferred alternative.

Page G1-75 – Table G1.4-10

- Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.
- v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

- Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Page G1-76 and G1-78 – Figure G1.4-9 and Figure G1.4-10

- This figure should indicate the new roadway extensions that are part of the preferred alternative. Additionally, new intersections and site driveways must be shown on the figure.

Page G1-77 – Table G1.4-11

- 55 seconds of delay would typically indicate LOS E conditions. Without Synchro worksheets provided, it cannot be definitely confirmed that there are no impacts at this intersection. Please clarify.
- Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.
- v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.
- Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Page G1-79

- In section 4.2.2.6 Nonmotorized Facilities, it should be more clearly defined where and what bicycle and pedestrian improvements are proposed as part of the preferred alternative.
- In section 4.2.2.8 Safety, the safety section should address if the project would impact intersections that already have a crash rate greater than 1.0 collisions per MEV.

Page G1-80

- In section 4.2.3.2 Traffic Volumes, information regarding existing land uses to be removed and associated trip generation projections for those uses need to be provided in this section.

Page G1-81 – Figure G1.4-11

- In addition to trip assignment, trip distribution figures should be included. Alternatively, trip distribution percentages could be illustrated on this figure (Figure G1.4-11).

Page G1-82 – Figure G1.4-12

- Intersection 10 is mislabeled for both AM and PM peak hours.
- If Intersection 1 is only providing access to the Christian Faith Church under build conditions, and little to no project trips are projected it is unlikely that this intersection would observe as much traffic as it does today. This analysis does not sufficiently account for (or sufficiently document) traffic that would be rerouted from 20th Avenue S due to the closure. As such, this analysis may not adequately consider additional impacts along SR 99 or 16th Street as a result. More broadly, a figure showing how existing traffic was removed and rerouted should be included.

Page G1-83 and G1-85 – Table G1.4-12 and Table G1.4-13

- If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.
- v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

Page G1-84 – Figure G1.4-13

- If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown on this figure (Figure G1.4-13).

Page G1-86 – Figure G1.4-14

- If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown on this figure (Figure G1.4-14).

Page G1-87

- In section 4.2.3.6 Nonmotorized Facilities, if the alternative eliminates the greenway between S 336th Street and S 344th Street this would have a significant impact as a north-south bicycle connection would not be possible and the majority of injury-related crashes involved pedestrians and cyclists along SR 99.

Page G1-88

- In section 4.2.3.8 Safety, the safety section should address if the project would impact intersections that already have a crash rate greater than 1.0 collisions per MEV. Additionally, this section should address non-motorized safety impacts associated with eliminating a north-south non-motorized connection.

Page G1-99

- In section 4.3.11 Estimation of Construction Truck Traffic, in addition to the impacts of truck activity, the impacts of trips related to workers traveling to and from the site should be quantified and discussed.

Page G1-104

- In section 4.3.1.6 Impacts to Nonmotorized Facilities, please clarify how long north-south connectivity would be impacted as pedestrians and cyclists would shift to SR 99 under this scenario.

Page G1-105

- In Section 4.3.1.7 Impacts to Parking, please clarify how many workers would be traveling to and from the site and if there would be sufficient parking on-site for all workers to park.

Page G1-122

- In section 4.7 Long Term Mitigation Measures, consistent with the executive summary, the City's street vacation process should be referenced as an ongoing coordination effort related to the reconfiguration of the street network.

Social Resources, Community Facilities, and Neighborhoods

Page 3.6-8

- Belmor is a manufactured home community, zoned multifamily residential.
- Clarification is needed on the expected displaced residences. Provide methodology for calculating impacted residents and provide addresses.
- What analysis went in to this conclusion? Airtime Aviation, Inc. is located in a custom-designed building for the use. The impact to this business and others like it is inadequately evaluated.

Page 3.6-11

- In the environmental justice summary; country of origin and immigration status should also be considered.

Economic and Fiscal Impacts

Page 3.5-1

- Clarification is required if the entire dataset in Section 3.5 “Economics” was calculated using King County level datasets or specific South King County Data Sets. South King County is defined as: Renton, Tukwila, SeaTac, Burien, Des Moines, Normandy Park, Kent, Auburn, and Federal Way.
- Using King County macro level data is not representative of the economic landscape of South King County as it relates to wages, demographics, type & size of industry, etc.

Land Use Impacts

There appear to be unaccounted for impacts from the preferred and S 344th St Alternatives related to affected parking, impacted businesses, and number of employees displaced. These need to be addressed.

The use of the OMF site is inconsistent with the City's urbanizing vision. Address the lack of planning for a smaller footprint for the facility or planning for mixed use by either placing parking in structures thereby allowing for other use of a portion of the property or the use by others of air rights above any of the planned facilities. The possibility of such a project could offset the economic impact of prohibiting the development of 60 acres of strategically located commercial land to its highest and best use.

Specific comments include:

Page ES-11 Figure ES-4

- Apparent unaccounted for impact from the Preferred Alternative to the parking/loading in the northeast corner of the Spectrum Business Park. The EIS should determine if the required parking for the uses at the Spectrum Business Park will be impacted, reduced, or result in any non-conformance.

Page ES-19

- How was this calculated? What are the exact businesses that are being displaced? Is there a spreadsheet of this information? According to Washington State Department of

Revenue there are significantly more 6 active business licenses that will be impacted. This misrepresentation also applies to the South 344th Street Alternative.

- Provide methodology for how the number of employees impacted was calculated. These numbers do not accurately reflect the true number of active businesses that may be impacted and the actual number of impacted employees are likely underrepresented.

The following comments are related to Appendix C

Page 23

- Activation Zone parking spaces are not shown on this map, but shown in others. Plans should be consistent.
- This is the only time in the entire DEIS that the Activation Zone is mentioned, but does not include square footage, uses, benefits, impacts, etc. Additional information for the activation zone is required.
- Any impacts to existing uses shall be addressed including parking stall or loading zone displacement. The OMFS site shall not create any nonconformities.
- Maps should be consistent and the impacts to adjacent uses must be measured. It appears Spectrum Business Park parking is being displaced here. Provide more information on how these impacts will be mitigated and the creation of any nonconformities will be avoided.

Page 27

- The activation zone should serve multi-modal travelers, including those arriving via vehicle. There must be parking available for the activation zone.

The Following comments are related to Appendix H2

Page H2-2

- The reference information for the Federal Way Revised Code and Federal Way Comprehensive Plan are inaccurate and should be updated to reflect the current standards.

Page H2-3

- The preferred and South 344th St alternatives reference some smaller areas within the City Center Core land use designation. This is inaccurate and needs to be updated.

Page H2-4

- The section concerning the Tacoma Dome Link Extension is outdated and needs revision. Not mentioned here is the South Station Subarea Plan and the Countywide Growth Center Candidate Designation which should be included.

Page H2-5 – Table H2-1

- Please provide basis for calculation of 17 acres in the CC-C zone due to OMF impacts.
- For the section concerning City of Federal Way Zone (RM-2400 and RM-3600: Multi-Family), it is not accurate to consider only a portion of the site as zoned multi-family. The preferred alternative is a majority zoned multi-family residential. Additionally, it is not appropriate to consider the OMF use as a Government Facility. Light rail or commuter rail transit facility require a Process IV review in the CC-C & CE zones.

Page H2-6 – Table H2-1

- For the BC: Community Business and CE: Commercial Enterprise zones, the permitting use for the OMFS would be Public Transportation Facilities, per FWRC 19.240.135. Considering the OMF a “Government facility” is not accurate.

Page H2-12 – Table H2-5

- Under Policy LUP 9, the statement that the OMFS site supports light rail operation which would support mixed use development is misleading and inaccurate. The light rail stations support light rail operations. Having the OMF site in the City of Federal Way does not support mixed-use development any more than the OMF site being located at Midway Landfill does.

Page H2-13 – Table H2-5

- Under Topic 2.7 Land Use Designations (Single Family). For Policy LUP14, the mitigation steps should not only be used to support aesthetic compatibility between uses, and should extend to include additional impacts like noise/sound, light, vibration, etc.
- Under Topic 2.7 Land Use Designations (Multi-Family). It is inaccurate to state that this project helps broaden transit options for multi-family households in the Federal Way area. The light rail stations support light rail operations. Having the OMF site in the City of Federal Way does not help broaden transit options for MF in the Federal Way area.

Page H2-15 – Table H2-5

- The response provided for consistency with comprehensive Plan Policy LU40 is inappropriate. The policy is about the range of retail and supportive uses.

Visual and Aesthetic Resources

Page 3.7-7

- The I5 and Pac Hwy corridor in Federal Way consists of significant asphalt surfacing, removing trees within this area will have an increasingly negative impact on the City's urban heat index and citywide tree canopy coverage. Impacts to the urban heat index and the citywide tree canopy coverage should be evaluated between alternatives. Tree planting to meet the average Citywide canopy (35%) should be a target for this facility, if located in Federal Way.

Page 3.7-11 – Figure 3.7-6

- The image shows redirected power lines. Confirm if this was intentional? Will they be redirected?

Page 3.7-16 – Figure 3.7-12

- The photo for the existing condition and simulation of proposed conditions appear to be the same. Confirm that no visual change is expected.

Page 3.7-17 – Figure 3.7-14

- A cell tower appears to be removed in the simulation of proposed conditions. Confirm this removal and provide mitigation method for tower if removal is expected.

Noise and Vibration

Page 3.9-7

- Confirm the methodology and noise sources used in the noise analysis. Were the maintenance activity and testing of horns noise generators included in the projections?
- The evaluation of noise impacts shall measure and account for any increase in ambient Interstate 5 noise resulting from tree removal and sound barrier as part of the track construction for both the preferred and S 344th alternatives.

Ecosystems and Resources

Page 3.10-26

- Language indicates that ‘frontage improvements along S 336th Street to meet city standards may necessitate the installation of a replacement structure where West Fork Hylebos Tributary is crossed by the road.’ This should be changed to ‘must replace the culvert.’

Page 3.11-12

- Any impacts to wetlands related to the extension of 18th Place S shall be eliminated or demonstrated to the City that impacts have been minimized and mitigated.
- Language indicates that ‘frontage improvements along S 336th Street to meet city standards may necessitate the installation of a replacement structure where West Fork Hylebos Tributary is crossed by the road.’ This should be changed to ‘must replace the culvert.’

Page 3.11-19

- Any impacts to wetlands related to the extension of 18th Place S shall be eliminated or demonstrated to the City that impacts have been minimized and mitigated.

Cumulative Effects

Page 4-3

- There is a large tree canopy with mature trees that will be heavily impacted by the proposed 18th Place S extension as part of the preferred alternative. Currently as proposed neither OMFS sites in Federal Way will meet Tree retention requirements. Please address.

Page 4-8

- Within section 4.1 under transportation, the City Center Access Project for Federal Way is described as unfunded. This is incorrect, the construction phase is currently unfunded however the design and right of way is funded. Please adjust.



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

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

Sincerely,

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 Appendix A1 comments
OMF South Draft Environmental Impact Statement – FW Mayor and City Council

Comments

OMF South FW Technical Review Letter final
Supplemental Appendix G1 comments
Sound Transit OMF Site Opportunity Cost Impact Assessment

Attachment

Supplemental Appendix A1 comments

[This page intentionally left blank]

Attachment

Supplemental Appendix G1 comments

[This page intentionally left blank]

Attachment

OMF South Draft Environmental Impact Statement – FW Mayor and City Council Comments

[This page intentionally left blank]

Attachment

Sound Transit OMF Site Opportunity Cost Impact Assessment

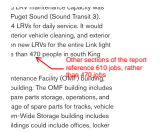
[This page intentionally left blank]

Attachment

OMF South Federal Way Technical Review Letter Final

[This page intentionally left blank]

marisfry (1)



Subject: Callout
Page Label: 6
Author: marisfry
Date: 10/23/2023 6:34:48 AM
Status:
Color:
Layer:
Space:

Other sections of the report reference 610 jobs, rather than 470 jobs

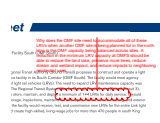
Desiree Winkler (1)



Subject: Text Box
Page Label: 39
Author: Desiree Winkler
Date: 10/20/2023 1:44:08 PM
Status:
Color:
Layer:
Space:

City center access received funding for phase 1 design and ROW. I believe the Triangle Project also has current design funding.

Chaney (4)



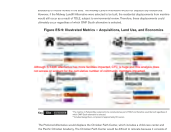
Subject: Cloud+
Page Label: 6
Author: Chaney
Date: 10/31/2023 4:01:11 PM
Status:
Color:
Layer:
Space:

Why does the OMF site need to accommodate all of these LRVs when another OMF site is being planned for in the north. How is the OMF capacity being balanced across sites. A reduction in the minimum LRV capacity at OMFS should be able to reduce the land take, preserve more trees, reduce stream and wetland impact, and reduce impacts to neighboring residential uses.



Subject: Cloud+
Page Label: 32
Author: Chaney
Date: 10/31/2023 3:57:08 PM
Status:
Color:
Layer:
Space:


Why is preferred option most land intensive? 6 acres more than 344th St.



Subject: Text Box
Page Label: 36
Author: Chaney
Date: 10/31/2023 3:54:02 PM
Status:
Color:
Layer:
Space:

Although S 344th alternative has more facilities impacted, CFC is huge and this analysis does not access or account for the cumulative number of community members impacted.




Subject: Cloud+
Page Label: 36
Author: Chaney
Date: 10/31/2023 3:55:06 PM
Status:
Color: 
Layer:
Space:

Provide methodology for calculating business displacement and provide list of those counted business. These number are under counting the true impacts

C Mullen (1)



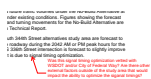
Subject: Text Box
Page Label: 30
Author: C Mullen
Date: 10/16/2023 8:45:42 AM
Status:
Color: 
Layer:
Space:

Any changes to schedule beyond a standard 5 day, 8 hr daytime schedule will require approval by the City. Nighttime work may not be allowed due to proximity to residential properties.



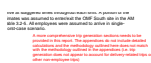
Subject: Callout
Page Label: 112
Author: marisfry
Date: 10/25/2023 2:36:45 PM
Status:
Color: ■
Layer:
Space:

It is noted that the annual growth rate is based on the growth rate used for TDLE traffic studies, but please specify what the basis for the assumed TDLE annual growth rate was. Typically, a higher annual growth rate closer to 1.25 percent has been used in the City of Federal Way.



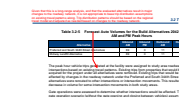
Subject: Callout
Page Label: 112
Author: marisfry
Date: 10/25/2023 2:37:05 PM
Status:
Color: ■
Layer:
Space:

Was this signal timing optimization vetted with WSDOT and/or City of Federal Way? Are there other external factors outside of the study area that would impact the ability to optimize the signal timings?



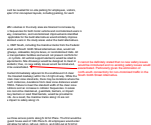
Subject: Callout
Page Label: 114
Author: marisfry
Date: 10/25/2023 2:47:48 PM
Status:
Color: ■
Layer:
Space:

A more comprehensive trip generation sections needs to be provided in this report. The appendices do not include detailed calculations and the methodology outlined here does not match with the methodology outlined in the appendices (i.e. trip generation does not appear to account for delivery-related trips or other non-employee trips)



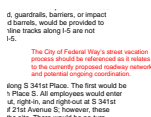
Subject: Callout
Page Label: 115
Author: marisfry
Date: 10/25/2023 2:37:59 PM
Status:
Color: ■
Layer:
Space:

Given that this is a long-range analysis, and that the evaluated alternatives result in major changes to the roadway network, it is not appropriate to base trip distribution assumptions on existing travel patterns along. Trip distribution patterns should be based on the regional travel model and adjusted as needed based on changes to the roadway network.



Subject: Callout
Page Label: 116
Author: marisfry
Date: 10/25/2023 2:39:15 PM
Status:
Color: ■
Layer:
Space:

It cannot be definitely stated that no new safety issues would be introduced and no existing safety issues would be exacerbated. Particularly given the elimination of north-south connectivity for non-motorized traffic in the South 344th Street Alternative.



Subject: Text Box
Page Label: 116
Author: marisfry
Date: 10/25/2023 2:48:33 PM
Status:
Color: ■
Layer:
Space:

The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.



Subject: Cloud+
Page Label: 117
Author: marisfry
Date: 10/25/2023 2:49:22 PM
Status:
Color: ■
Layer:
Space:

This is not consistent with the provided site plan. The description and if applicable, the associated analysis should be updated.

vic must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the vic standard applies to them.

Table 3.2-6 Preferred Alternative

ID	Intersection	Control Type	Righting Standard
1	at Lakeland Cemetery 2000 Lakeland St.	Signal	Full
2	SR 99	Signal	WIDOT Highways of Statewide

Subject: Text Box
Page Label: 118
Author: marisfry
Date: 10/25/2023 2:39:41 PM
Status:
Color: ■
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

Intersection	Control	Access	Notes
SR 99/Driveway	Signal	Left	Left turn lane
SR 99/Driveway	Signal	Right	Right turn lane

1. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

2. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

3. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

4. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

5. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

6. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

7. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

8. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

9. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

10. The intersection of SR 99 and Driveway is a signalized intersection. The intersection is controlled by a traffic signal. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway. The intersection is located at the intersection of SR 99 and Driveway.

Subject: Callout
Page Label: 118
Author: marisfry
Date: 10/25/2023 2:52:58 PM
Status:
Color: ■
Layer:
Space:

Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.

-	-	-	N/A	N/A
---	---	---	-----	-----

downstream congestion. Actual intersection operations may have more delay based on intersection characteristics.

SR 200 (2010) be signalized and unsignalized intersections, except where HCM 6B-10(b) is indicated (see 2010).

Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-4. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Subject: Text Box
Page Label: 118
Author: marisfry
Date: 10/25/2023 2:53:18 PM
Status:
Color: ■
Layer:
Space:

Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-6. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

vi) must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the city standard applies to them.

Table 3.2-7 Preferred Alternative

ID	Intersection	Control Type	Agency Standard
1	1st Avenue SR 99/Driveway	Signal	Left or Federal City Standard
			Right or Federal City Standard

Subject: Text Box
Page Label: 119
Author: marisfry
Date: 10/25/2023 2:39:48 PM
Status:
Color: ■
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

Direction	Volume	Delay	LOS
Northbound	100	55	D
Southbound	100	55	D

Subject: Callout
Page Label: 119
Author: marisfry
Date: 10/25/2023 2:51:17 PM
Status:
Color: ■
Layer:
Space:

55 seconds of delay would typically indicate LOS E conditions. Without Synchro worksheets provided, it cannot be definitely confirmed that there are no impacts at this intersection. Please clarify.

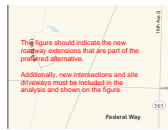
Subject: Callout
Page Label: 119
Author: marisfry
Date: 10/25/2023 2:51:47 PM
Status:
Color: ■
Layer:
Space:

Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.

Intersecting properties. Actual intersection operations may differ from what is shown on this map. The City of Federal Way is not responsible for any errors or omissions. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Subject: Text Box
Page Label: 119
Author: marisfry
Date: 10/25/2023 2:52:10 PM
Status:
Color: ■
Layer:
Space:

Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-7. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.



Subject: Text Box
Page Label: 120
Author: marisfry
Date: 10/25/2023 2:50:41 PM
Status:
Color: ■
Layer:
Space:

This figure should indicate the new roadway extensions that are part of the preferred alternative.

Additionally, new intersections and site driveways must be included in the analysis and shown on the figure.

3.2 Transportation
 The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.
 Access points: The first would be a intersection of S 344th Street/18th Place S, S 344th Street. All employees would enter the road at 20th Avenue S, south of S 336th Street, 1 328th Street. However, it would not be for daily 18th Place S/S 341st Place, the south and east.

Subject: Text Box
Page Label: 121
Author: marisfry
Date: 10/25/2023 2:54:24 PM
Status:
Color: ■
Layer:
Space:

The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.

as needed for all intersections, including those along State Routes. City of Federal Way is not responsible for any errors or omissions. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Table 3.2-8 South 344th Street Access			
Access Point	Access Point	Access Point	Access Point
Access Point	Access Point	Access Point	Access Point
Access Point	Access Point	Access Point	Access Point

Subject: Text Box
Page Label: 122
Author: marisfry
Date: 10/25/2023 2:40:02 PM
Status:
Color: ■
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

as needed for all intersections, including those along State Routes. City of Federal Way is not responsible for any errors or omissions. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Table 3.2-9 South 344th Street Access			
Access Point	Access Point	Access Point	Access Point
Access Point	Access Point	Access Point	Access Point
Access Point	Access Point	Access Point	Access Point

Subject: Text Box
Page Label: 122
Author: marisfry
Date: 10/25/2023 2:54:43 PM
Status:
Color: ■
Layer:
Space:

If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.

Table 3.2-10 South 58th Street Interchange

Intersection	Proposed	Existing
SR 99	1	1

Subject: Text Box
Page Label: 123
Author: marisfry
Date: 10/25/2023 2:40:05 PM
Status:
Color: ■
Layer:
Space:

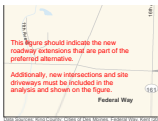
v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

Table 3.2-11 South 58th Street Interchange

Intersection	Proposed	Existing
SR 99	1	1

Subject: Text Box
Page Label: 123
Author: marisfry
Date: 10/25/2023 2:55:42 PM
Status:
Color: ■
Layer:
Space:

If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.



Subject: Text Box
Page Label: 124
Author: marisfry
Date: 10/25/2023 2:55:26 PM
Status:
Color: ■
Layer:
Space:

This figure should indicate the new roadway extensions that are part of the preferred alternative.

Additionally, new intersections and site driveways must be included in the analysis and shown on the figure.

Table 3.2-12 Estimated Hourly Truck Activity Compared with Existing

Intersection	Proposed	Existing
SR 99	1	1

Subject: Callout
Page Label: 125
Author: marisfry
Date: 10/25/2023 2:40:54 PM
Status:
Color: ■
Layer:
Space:

This would have a significant impact as a north-south bicycle connection would not be possible and the majority of injury-related crashes involved ped and cyclists along SR 99

Table 3.2-13 Estimated Hourly Truck Activity Compared with Existing

Intersection	Proposed	Existing
SR 99	1	1

Subject: Text Box
Page Label: 132
Author: marisfry
Date: 10/25/2023 2:56:51 PM
Status:
Color: ■
Layer:
Space:


In addition to the impacts of truck activity, the impacts of trips related to workers traveling to and from the site should be quantified and discussed.

Table 3.2-14 Estimated Hourly Truck Activity Compared with Existing

Intersection	Proposed	Existing
SR 99	1	1


Subject: Text Box
Page Label: 132
Author: marisfry
Date: 10/25/2023 2:57:35 PM
Status:
Color: ■
Layer:
Space:

Please clarify how many workers would be traveling to and from the site and if there would be sufficient parking on-site for all workers to park.


Subject: Text Box
Page Label: 141
Author: marisfry
Date: 10/25/2023 2:58:05 PM
Status:
Color: 
Layer:
Space:


Consistent with the executive summary, the City's street vacation process should be referenced as an ongoing coordination effort related to the reconfiguration of the street network.

Desiree Winkler (14)


Subject: Text Box
Page Label: 76
Author: Desiree Winkler
Date: 10/20/2023 4:33:20 PM
Status:
Color: 
Layer:
Space:

this last sentence seems out of context with the paragraph. What 1,000 SF building?


Subject: Rectangle
Page Label: 76
Author: Desiree Winkler
Date: 10/20/2023 4:32:56 PM
Status:
Color: 
Layer:
Space:

Subject: Rectangle
Page Label: 76
Author: Desiree Winkler
Date: 10/20/2023 4:33:13 PM
Status:
Color: 
Layer:
Space:

insit revised the site configurati

Subject: Text Box
Page Label: 77
Author: Desiree Winkler
Date: 10/20/2023 4:39:07 PM
Status:
Color: 
Layer:
Space:

How can environmental impacts from TDLE be considered part of the "no-build" alternative if TDLE does not have an approved environmental document?

Subject: Text Box
Page Label: 111
Author: Desiree Winkler
Date: 10/23/2023 12:01:25 PM
Status:
Color: 
Layer:
Space:

should this 3-year time period be updated to more current?

Status:
Color:

and roadway grade construction?

these photos look the



Color: 





Color: 

Color:


Color:

Color:

Subject: Line
Page Label: 285
Author: Desiree Winkler
Date: 10/27/2023 10:43:24 AM
Status:
Color: 
Layer:
Space:

Subject: Text Box
Page Label: 285
Author: Desiree Winkler
Date: 10/27/2023 10:43:56 AM
Status:
Color: 
Layer:
Space:


site design needs to eliminate wetland impacts related to 18th PI S

Subject: Text Box
Page Label: 292
Author: Desiree Winkler
Date: 10/27/2023 10:49:47 AM
Status:
Color: 
Layer:
Space:

need to avoid encroachment

Chaney (12)




Subject: Cloud+
Page Label: 24
Author: Chaney
Date: 10/31/2023 4:05:12 PM
Status:
Color: 
Layer:
Space:

Apparent unaccounted for impact from the Preferred Alternative to the parking/loading in the northeast corner of the Spectrum Business Park. The EIS should determine if the required parking for the uses at the Spectrum Business Park will be impacted, reduced, or result in any non-conformance.

How was this collected? What are the most interesting facts that are interesting? It is from a spreadsheet of this information? *Assessing the Implications: How Comparing of Results from this survey is*


major research article and with other studies in the *Available in the* *the characteristics and impacts of the Built Environment*

Key Characteristics and Impacts	Physical Environment	Health Status, Behavior	Quality of Life
Physical Environment			
Urban Form	1.00		
Land Use	0.85		
Transportation	0.75		
Green Space	0.65		
Water Quality	0.55		
Air Quality	0.45		
Climate Change	0.35		
Disaster Risk	0.25		
Equity	0.15		
Community	0.05		
Health	0.95	1.00	
Behavior	0.80	0.90	1.00
Quality of Life	0.70	0.80	0.95

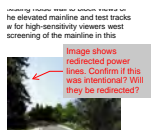
Subject: Callout
Page Label: 32
Author: Chaney
Date: 10/26/2023 3:10:08 PM
Status:
Color: 
Layer:
Space:

How was this calculated? What are the exact businesses that are being displaced? Is there a spreadsheet of this information? According to Washington State Department of Revenue there are way more 6 active business licenses that will be impacted. This also applies to the South 344th Street Alternative

[illegible]

Subject: Cloud+
Page Label: 32
Author: Chaney
Date: 10/31/2023 4:06:20 PM
Status:
Color: 
Layer:
Space:

Provide methodology for how the number of employees impacted was calculated. I am concerned these numbers do not accurately reflect the true number of active businesses that may be impacted and undercount the actual number of impacted employees.



Subject: Callout
Page Label: 204
Author: Chaney
Date: 10/31/2023 4:13:01 PM
Status:
Color: ■
Layer:
Space:

Image shows redirected power lines. Confirm if this was intentional? Will they be redirected?



Subject: Cloud+
Page Label: 230
Author: Chaney
Date: 10/31/2023 4:18:13 PM
Status:
Color: ■
Layer:
Space:

The evaluation of noise impact should measure and account for any increase in ambient I5 noise caused from tree removal and sound barrier as part of the track construction.

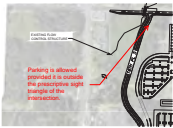


Subject: Callout
Page Label: 360
Author: Chaney
Date: 10/31/2023 4:19:16 PM
Status:
Color: ■
Layer:
Space:

There is a large tree canopy with mature trees that will be heavily impacted by the proposed 18th Place S Extension as part of the Preferred alternative. Currently as proposed neither OMF sites in Federal Way will meet Tree Retention requirements.

04-OMFS NEPA SEPA DEIS Appendix C Conceptual Design Drawings and Engineering Information.pdf Markup Summary

K Smith (1)



Subject: Callout
Page Label: 31
Author: K Smith
Date: 11/3/2023 9:53:18 AM
Status:
Color: ■
Layer:
Space:

Parking is allowed provided it is outside the prescriptive sight triangle of the intersection.

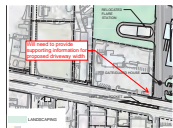
Chris Cavallo (85)



Subject: Cloud
Page Label: 5
Author: Chris Cavallo
Date: 10/23/2023 3:06:41 PM
Status:
Color: ■
Layer:
Space:



Subject: Cloud
Page Label: 5
Author: Chris Cavallo
Date: 10/23/2023 3:06:50 PM
Status:
Color: ■
Layer:
Space:



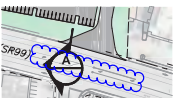
Subject: Text Box
Page Label: 5
Author: Chris Cavallo
Date: 10/23/2023 3:07:25 PM
Status:
Color: ■
Layer:
Space:

Will need to provide supporting information for proposed driveway width



Subject: Text Box
Page Label: 5
Author: Chris Cavallo
Date: 10/23/2023 3:07:51 PM
Status:
Color: ■
Layer:
Space:

Will need to provide supporting information for proposed driveway width and geometry



Subject: Cloud
Page Label: 5
Author: Chris Cavallo
Date: 10/23/2023 3:08:14 PM
Status:
Color: ■
Layer:
Space:



Subject: Text Box
Page Label: 5
Author: Chris Cavallo
Date: 10/23/2023 4:35:05 PM
Status:
Color: ■
Layer:
Space:

Chan improvements needed on Pacific Hwy to support new access

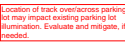


Subject: Cloud
Page Label: 5
Author: Chris Cavallo
Date: 10/23/2023 3:09:10 PM
Status:
Color: ■
Layer:
Space:



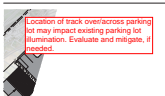
Subject: Text Box
Page Label: 5
Author: Chris Cavallo
Date: 10/23/2023 3:12:10 PM
Status:
Color: ■
Layer:
Space:

Chan/median improvements needed on Pacific Hwy to support new access



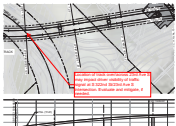
Subject: Text Box
Page Label: 15
Author: Chris Cavallo
Date: 10/20/2023 3:52:31 PM
Status:
Color: ■
Layer:
Space:

Location of track over/under crossing parking lot may impact existing parking lot illumination. Evaluate and mitigate, if needed.



Subject: Text Box
Page Label: 16
Author: Chris Cavallo
Date: 10/23/2023 4:35:26 PM
Status:
Color: ■
Layer:
Space:

Location of track over/under crossing parking lot may impact existing parking lot illumination. Evaluate and mitigate, if needed.



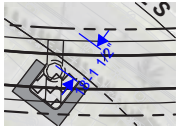
Subject: Text Box
Page Label: 16
Author: Chris Cavallo
Date: 10/20/2023 3:55:34 PM
Status:
Color: ■
Layer:
Space:

Location of track over/under crossing 23rd Ave S may impact driver visibility of traffic signal at S 322nd St/23rd Ave S intersection. Evaluate and mitigate, if needed.



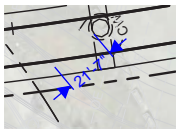
Subject: Text Box
Page Label: 16
Author: Chris Cavallo
Date: 10/23/2023 4:35:34 PM
Status:
Color: ■
Layer:
Space:

Location of track over/across S 322nd St may impact driver visibility of existing traffic signal at S 322nd St/23rd Ave S intersection. Evaluate and mitigate, if needed.



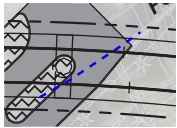
Subject: Length Measurement
Page Label: 16
Author: Chris Cavallo
Date: 10/20/2023 4:03:37 PM
Status:
Color: ■
Layer:
Space:

18'-1 1/2"

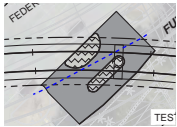


Subject: Length Measurement
Page Label: 16
Author: Chris Cavallo
Date: 10/20/2023 4:03:45 PM
Status:
Color: ■
Layer:
Space:

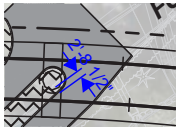
21'-7"



Subject: PolyLine
Page Label: 16
Author: Chris Cavallo
Date: 10/20/2023 4:05:04 PM
Status:
Color: ■
Layer:
Space:

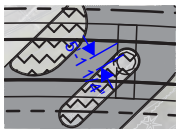


Subject: PolyLine
Page Label: 16
Author: Chris Cavallo
Date: 10/20/2023 4:05:04 PM
Status:
Color: ■
Layer:
Space:



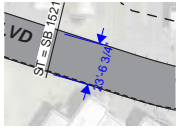
Subject: Length Measurement
Page Label: 16
Author: Chris Cavallo
Date: 10/20/2023 4:03:09 PM
Status:
Color: ■
Layer:
Space:

2'-8 1/2"



Subject: Length Measurement
Page Label: 16
Author: Chris Cavallo
Date: 10/20/2023 4:03:14 PM
Status:
Color: ■
Layer:
Space:

5'-1 1/4"



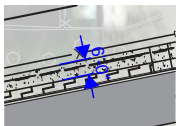
Subject: Length Measurement
Page Label: 17
Author: Chris Cavallo
Date: 10/20/2023 4:09:11 PM
Status:
Color: ■
Layer:
Space:

23'-6 3/4"



Subject: Text Box
Page Label: 19
Author: Chris Cavallo
Date: 10/20/2023 4:13:07 PM
Status:
Color: ■
Layer:
Space:

Set gate further from 24th Ave S so that access ST maintenance vehicles can pull completely out of the roadway when opening the gate



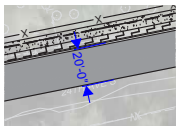
Subject: Length Measurement
Page Label: 19
Author: Chris Cavallo
Date: 10/20/2023 4:20:14 PM
Status:
Color: ■
Layer:
Space:

6'-0"



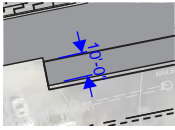
Subject: Length Measurement
Page Label: 19
Author: Chris Cavallo
Date: 10/20/2023 4:14:09 PM
Status:
Color: ■
Layer:
Space:

4'-0"



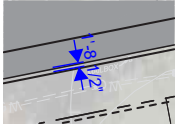
Subject: Length Measurement
Page Label: 19
Author: Chris Cavallo
Date: 10/20/2023 4:20:07 PM
Status:
Color: ■
Layer:
Space:

20'-0"



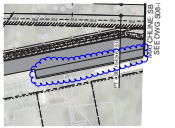
Subject: Length Measurement
Page Label: 19
Author: Chris Cavallo
Date: 10/20/2023 4:23:36 PM
Status:
Color: ■
Layer:
Space:

10'-0"

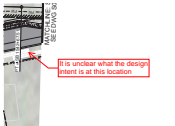


Subject: Length Measurement
Page Label: 19
Author: Chris Cavallo
Date: 10/20/2023 4:24:07 PM
Status:
Color: ■
Layer:
Space:

1'-8 1/2"

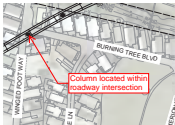


Subject: Cloud
Page Label: 19
Author: Chris Cavallo
Date: 10/20/2023 4:24:33 PM
Status:
Color: ■
Layer:
Space:



Subject: Text Box
Page Label: 19
Author: Chris Cavallo
Date: 10/20/2023 4:24:57 PM
Status:
Color: ■
Layer:
Space:

It is unclear what the design intent is at this location



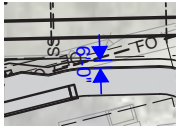
Subject: Text Box
Page Label: 20
Author: Chris Cavallo
Date: 10/20/2023 4:22:19 PM
Status:
Color: ■
Layer:
Space:

Column located within roadway intersection



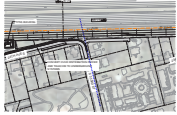
Subject: Length Measurement
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:26:16 PM
Status:
Color: ■
Layer:
Space:

24'-0"

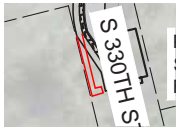


Subject: Length Measurement
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:26:55 PM
Status:
Color: ■
Layer:
Space:

6'-0"



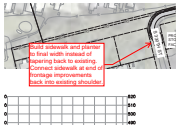
Subject: Line
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:30:05 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:34:20 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:34:07 PM
Status:
Color: ■
Layer:
Space:



Subject: Text Box
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:35:26 PM
Status:
Color: ■
Layer:
Space:

Build sidewalk and planter to final width instead of tapering back to existing. Connect sidewalk at end of frontage improvements back into existing shoulder.



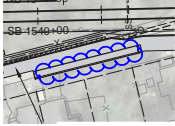
Subject: Text Box
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:31:27 PM
Status:
Color: ■
Layer:
Space:

Match face of curb location to built out sections of S 333rd St



Subject: Text Box
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:38:55 PM
Status:
Color: ■
Layer:
Space:

It is unclear what the design intent is at this location

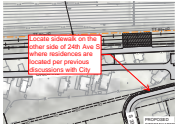


Subject: Cloud
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:38:50 PM
Status:
Color: ■
Layer:
Space:



Subject: Text Box
Page Label: 21
Author: Chris Cavallo
Date: 10/20/2023 4:40:15 PM
Status:
Color: ■
Layer:
Space:

See additional related comments on sheet S08B-KAP105



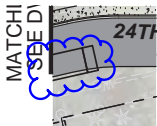
Subject: Text Box
Page Label: 21
Author: Chris Cavallo
Date: 10/23/2023 4:36:54 PM
Status:
Color: ■
Layer:
Space:

Locate sidewalk on the other side of 24th Ave S where residences are located per previous discussions with City

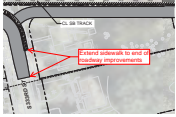


Subject: Text Box
Page Label: 23
Author: Chris Cavallo
Date: 10/20/2023 4:38:08 PM
Status:
Color: ■
Layer:
Space:

It is unclear what the design intent is at this location

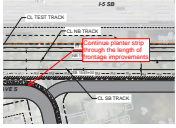


Subject: Cloud
Page Label: 23
Author: Chris Cavallo
Date: 10/20/2023 4:38:01 PM
Status:
Color: ■
Layer:
Space:



Subject: Text Box
Page Label: 23
Author: Chris Cavallo
Date: 10/20/2023 4:38:23 PM
Status:
Color: ■
Layer:
Space:

Extend sidewalk to end of roadway improvements



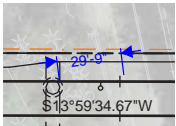
Subject: Text Box
Page Label: 23
Author: Chris Cavallo
Date: 10/20/2023 4:38:16 PM
Status:
Color: ■
Layer:
Space:

Continue planter strip through the length of frontage improvements



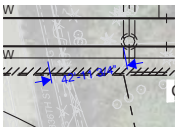
Subject: Text Box
Page Label: 23
Author: Chris Cavallo
Date: 10/20/2023 4:40:45 PM
Status:
Color: ■
Layer:
Space:

See additional related comments on sheet B00-KAP02



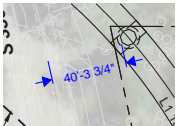
Subject: Length Measurement
Page Label: 24
Author: Chris Cavallo
Date: 10/20/2023 4:44:37 PM
Status:
Color: ■
Layer:
Space:

29'-9"



Subject: Length Measurement
Page Label: 24
Author: Chris Cavallo
Date: 10/20/2023 4:44:46 PM
Status:
Color: ■
Layer:
Space:

42'-11 3/4"



Subject: Length Measurement
Page Label: 24
Author: Chris Cavallo
Date: 10/20/2023 4:46:42 PM
Status:
Color: ■
Layer:
Space:

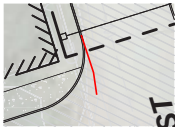
40'-3 3/4"



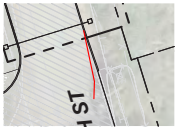
Subject: PolyLine
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:50:11 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:50:56 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:51:05 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:51:14 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:51:35 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:51:40 PM
Status:
Color: ■
Layer:
Space:

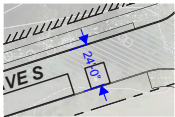


Subject: Cloud
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:52:06 PM
Status:
Color: ■
Layer:
Space:



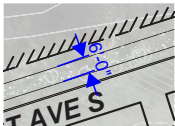
Subject: Text Box
Page Label: 26
Author: Chris Cavallo
Date: 10/23/2023 4:38:39 PM
Status:
Color: ■
Layer:
Space:

Update design to represent the intended roadway curve. Revise the access to driveway standards.



Subject: Length Measurement
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:54:25 PM
Status:
Color: ■
Layer:
Space:

24'-0"



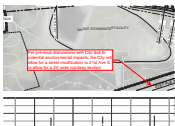
Subject: Length Measurement
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:54:37 PM
Status:
Color: ■
Layer:
Space:

6'-0"



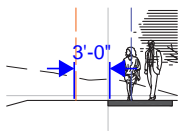
Subject: Length Measurement
Page Label: 26
Author: Chris Cavallo
Date: 10/20/2023 4:54:48 PM
Status:
Color: ■
Layer:
Space:

4'-0"



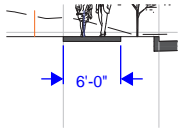
Subject: Text Box
Page Label: 26
Author: Chris Cavallo
Date: 10/23/2023 4:38:21 PM
Status:
Color: ■
Layer:
Space:

Per previous discussions with City due to potential environmental impacts, the City will allow for a street modification to 21st Ave S to allow for a 24' wide roadway section



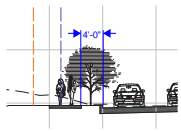
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:27:45 PM
Status:
Color: ■
Layer:
Space:

3'-0"



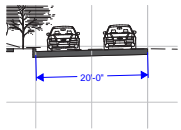
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:28:07 PM
Status:
Color: ■
Layer:
Space:

6'-0"



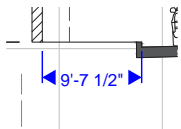
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:28:05 PM
Status:
Color: ■
Layer:
Space:

4'-0"



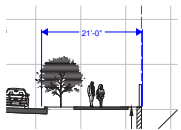
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:28:01 PM
Status:
Color: ■
Layer:
Space:

20'-0"



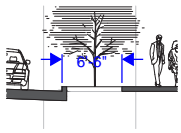
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:29:04 PM
Status:
Color: ■
Layer:
Space:

9'-7 1/2"



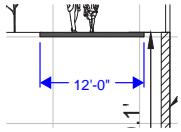
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:29:35 PM
Status:
Color: ■
Layer:
Space:

21'-0"



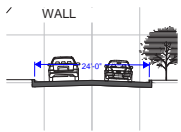
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:29:24 PM
Status:
Color: ■
Layer:
Space:

6'-6"



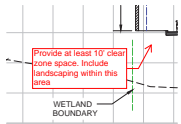
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:29:31 PM
Status:
Color: ■
Layer:
Space:

12'-0"



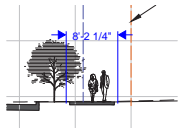
Subject: Length Measurement
Page Label: 29
Author: Chris Cavallo
Date: 10/20/2023 5:29:43 PM
Status:
Color: ■
Layer:
Space:

24'-0"



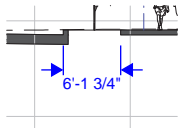
Subject: Text Box
Page Label: 29
Author: Chris Cavallo
Date: 10/23/2023 4:26:50 PM
Status:
Color: ■
Layer:
Space:

Provide at least 10' clear zone space. Include landscaping within this area



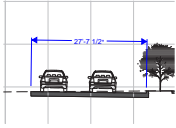
Subject: Length Measurement
Page Label: 30
Author: Chris Cavallo
Date: 10/20/2023 5:24:38 PM
Status:
Color: ■
Layer:
Space:

8'-2 1/4"



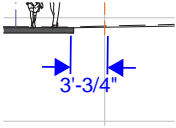
Subject: Length Measurement
Page Label: 30
Author: Chris Cavallo
Date: 10/20/2023 5:24:15 PM
Status:
Color: ■
Layer:
Space:

6'-1 3/4"



Subject: Length Measurement
Page Label: 30
Author: Chris Cavallo
Date: 10/20/2023 5:24:34 PM
Status:
Color: ■
Layer:
Space:

27'-7 1/2"



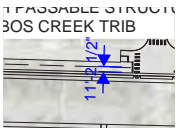
Subject: Length Measurement
Page Label: 30
Author: Chris Cavallo
Date: 10/20/2023 5:26:00 PM
Status:
Color: ■
Layer:
Space:

3'-3/4"



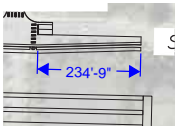
Subject: Text Box
Page Label: 31
Author: Chris Cavallo
Date: 10/20/2023 5:09:31 PM
Status:
Color: ■
Layer:
Space:

S 341st PI



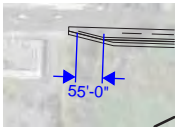
Subject: Length Measurement
Page Label: 31
Author: Chris Cavallo
Date: 10/20/2023 5:16:20 PM
Status:
Color: ■
Layer:
Space:

11'-2 1/2"



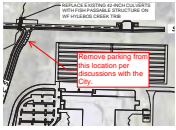
Subject: Length Measurement
Page Label: 31
Author: Chris Cavallo
Date: 10/20/2023 5:17:09 PM
Status:
Color: ■
Layer:
Space:

234'-9"



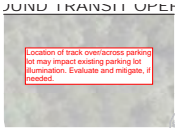
Subject: Length Measurement
Page Label: 31
Author: Chris Cavallo
Date: 10/20/2023 5:17:38 PM
Status:
Color: ■
Layer:
Space:

55'-0"



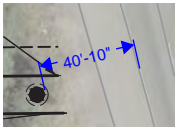
Subject: Text Box
Page Label: 31
Author: Chris Cavallo
Date: 10/23/2023 4:28:16 PM
Status:
Color: ■
Layer:
Space:

Remove parking from this location per discussions with the City.



Subject: Text Box
Page Label: 38
Author: Chris Cavallo
Date: 10/20/2023 5:05:59 PM
Status:
Color: ■
Layer:
Space:

Location of track over/along parking lot may impact existing parking lot illumination. Evaluate and mitigate, if needed.



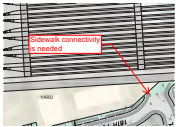
Subject: Length Measurement
Page Label: 40
Author: Chris Cavallo
Date: 10/20/2023 5:04:53 PM
Status:
Color: ■
Layer:
Space:

40'-10"



Subject: Text Box
Page Label: 41
Author: Chris Cavallo
Date: 10/23/2023 3:26:29 PM
Status:
Color: ■
Layer:
Space:

Need to evaluate access needs for property



Subject: Text Box
Page Label: 41
Author: Chris Cavallo
Date: 10/23/2023 3:29:44 PM
Status:
Color: ■
Layer:
Space:

Sidewalk connectivity is needed



Subject: PolyLine
Page Label: 41
Author: Chris Cavallo
Date: 10/23/2023 3:28:46 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 41
Author: Chris Cavallo
Date: 10/23/2023 3:29:18 PM
Status:
Color: ■
Layer:
Space:



Subject: PolyLine
Page Label: 41
Author: Chris Cavallo
Date: 10/23/2023 3:29:08 PM
Status:
Color: ■
Layer:
Space:

Chaney (5)



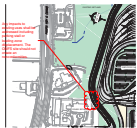
Subject: Cloud+
Page Label: 27
Author: Chaney
Date: 10/31/2023 4:19:51 PM
Status:
Color: ■
Layer:
Space:

This is the only time in the entire DEIS that the Activation Zone is mentioned, but does not include square footage, uses, benefits, impacts etc.



Subject: Cloud+
Page Label: 27
Author: Chaney
Date: 10/26/2023 3:37:04 PM
Status:
Color: ■
Layer:
Space:

Activation Zone parking spaces are not shown on this map, but shown in others. Plans should be consistent.



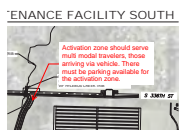
Subject: Cloud+
Page Label: 27
Author: Chaney
Date: 10/31/2023 4:22:24 PM
Status:
Color: ■
Layer:
Space:

Any impacts to existing uses shall be addressed including parking stall or loading zone displacement. The OMFS site should not create any nonconformities.



Subject: Cloud+
Page Label: 27
Author: Chaney
Date: 10/31/2023 4:24:30 PM
Status:
Color: ■
Layer:
Space:

Maps should be consistent and the impacts to adjacent uses must be measured. It appears Spectrum Business Park parking is being displaced here. Provide more information on how these impact will be mitigated and the creation of any nonconformities will be avoided.



Subject: Callout

Page Label: 31

Author: Chaney

Date: 11/2/2023 8:56:28 AM

Status:

Color: ■

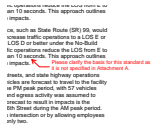
Layer:

Space:

Activation zone should serve multi modal travelers, those arriving via vehicle. There must be parking available for the activation zone.

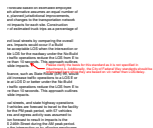
08-OMFS NEPA SEPA DEIS Appendix G.1 Transportation Tech Report.pdf Markup Summary

marisfry (54)



Subject: Callout
Page Label: 2
Author: marisfry
Date: 10/23/2023 6:47:06 AM
Status:
Color: ■
Layer:
Space:

Please clarify the basis for this standard as it is not specified in Attachment A.



Subject: Callout
Page Label: 2
Author: marisfry
Date: 10/24/2023 6:45:21 AM
Status:
Color: ■
Layer:
Space:

Please clarify the basis for this standard as it is not specified in Attachment A. Additionally, the City of Federal Way standards should be referenced here since they are based on v/c rather than LOS/delay.



Subject: Text Box
Page Label: 8
Author: marisfry
Date: 10/24/2023 6:56:54 AM
Status:
Color: ■
Layer:
Space:

Overall Comments:

- The analysis provided does not adequately analyze the preferred and 344th Street alternatives as not all new driveways/intersections are included and/or incorrect driveways are included. Additionally, v/c must be recorded for all intersections including those along State Routes as the City of Federal Way controls these intersections.

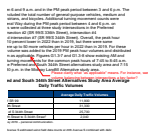
- There is insufficient information provided related to the existing land uses removed and traffic rerouted as a result of vacated streets. Supplemental trip generation analysis and volume figures should be provided to illustrate how these conditions impact the future volumes. Without this information it is not possible to validate the future volumes provided.

- Additional attachments must be provided including detailed trip generation information for the OMF South site and existing land uses; traffic counts; and Synchro worksheets.



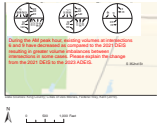
Subject: Cloud+
Page Label: 12
Author: marisfry
Date: 10/24/2023 6:46:27 AM
Status:
Color: ■
Layer:
Space:

The extension of 18th Place S is described as intersection S 336th Street as the fourth (NB) leg of the 18th Ave S/S 336th St intersection, but the conceptual site plan does not depict it in this way due to the creek. It is assumed that a four-leg intersection is not feasible here and therefore the description/analysis should be revised accordingly.



Subject: Callout
Page Label: 29
Author: marisfry
Date: 10/23/2023 7:09:14 AM
Status:
Color: ■
Layer:
Space:

Please clarify what "as applicable" means. For instance, was volume balancing between intersections a key factor?



Subject: Text Box
Page Label: 30
Author: marisfry
Date: 10/24/2023 6:46:55 AM
Status:
Color: ■
Layer:
Space:

During the AM peak hour, existing volumes at intersections 6 and 9 have decreased as compared to the 2021 DEIS resulting in greater volume imbalances between intersections in some cases. Please explain the change from the 2021 DEIS to the 2023 ADEIS.

Category	2021 DEIS	2023 ADEIS
Category 1	100	100
Category 2	100	100
Category 3	100	100
Category 4	100	100
Category 5	100	100
Category 6	100	100
Category 7	100	100
Category 8	100	100
Category 9	100	100
Category 10	100	100

Subject: Text Box
Page Label: 38
Author: marisfry
Date: 10/24/2023 6:48:20 AM
Status:
Color: ■
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.

Category	2021 DEIS	2023 ADEIS
Category 1	100	100
Category 2	100	100
Category 3	100	100
Category 4	100	100
Category 5	100	100
Category 6	100	100
Category 7	100	100
Category 8	100	100
Category 9	100	100
Category 10	100	100

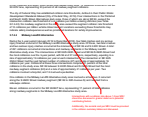
Subject: Text Box
Page Label: 40
Author: marisfry
Date: 10/24/2023 6:48:35 AM
Status:
Color: ■
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.



Subject: Callout
Page Label: 53
Author: marisfry
Date: 10/23/2023 7:13:47 AM
Status:
Color: ■
Layer:
Space:

While it is acceptable to use collision data from 2016 to 2018 because collision data during the pandemic was atypical, many studies have found that collision rates were higher during the pandemic. Therefore it may not be accurate to say that 2016 to 2018 collision data is more conservative.



Subject: Callout
Page Label: 60
Author: marisfry
Date: 10/24/2023 7:02:00 AM
Status:
Color: ■
Layer:
Space:

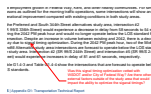
Intersections with a collision rate above 1.0 per MEV should be discussed in greater detail as to potential contributing factors.

Additionally, the societal cost per MEV must be provided in the collision summary tables and discussed.



Subject: Callout
Page Label: 63
Author: marisfry
Date: 10/24/2023 7:02:53 AM
Status:
Color: ■
Layer:
Space:

It is noted that the annual growth rate is based on the growth rate used for TDLE traffic studies, but please specify what the basis for the assumed TDLE annual growth rate was. Typically, a higher annual growth rate closer to 1.25 percent has been used in the City of Federal Way.



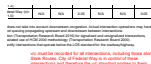
Subject: Callout
Page Label: 64
Author: marisfry
Date: 10/25/2023 2:35:52 PM
Status:
Color: ■
Layer:
Space:

Was this signal timing optimization vetted with WSDOT and/or City of Federal Way? Are there other external factors outside of the study area that would impact the ability to optimize the signal timings?



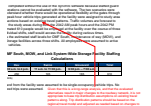
Subject: Text Box
Page Label: 67
Author: marisfry
Date: 10/24/2023 6:49:04 AM
Status:
Color: ■
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.



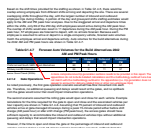
Subject: Text Box
Page Label: 69
Author: marisfry
Date: 10/24/2023 6:49:14 AM
Status:
Color: ■
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.



Subject: Callout
Page Label: 77
Author: marisfry
Date: 10/23/2023 7:39:14 AM
Status:
Color: ■
Layer:
Space:

Given that this is a long-range analysis, and that the evaluated alternatives result in major changes to the roadway network, it is not appropriate to base trip distribution assumptions on existing travel patterns along. Trip distribution patterns should be based on the regional travel model and adjusted as needed based on changes to the roadway network.



Subject: Callout
Page Label: 78
Author: marisfry
Date: 10/23/2023 8:24:15 AM
Status:
Color: ■
Layer:
Space:

A more comprehensive trip generation sections needs to be provided in this report. The appendices do not include detailed calculations and the methodology outlined here does not match with the methodology outlined in the appendices (i.e. trip generation does not appear to account for delivery-related trips or other non-employee trips)

Please specify the approximate number of parking spaces this represents for each alternative.

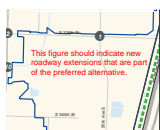
Additionally, if north-south non-motorized facilities would not be feasible as part of the 344th Street Alternative, safety would not improve for non-motorized users and could in fact worsen. Please elaborate.

Information regarding existing land uses to be removed and associated trip generation projections for those uses need to be provided in this section.

This is not consistent with the provided site plan. The description and if applicable, the associated analysis should be updated.

The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.

In addition to trip assignment, trip distribution figures should be included. Alternatively, trip distribution percentages could be illustrated on this figure (Figure G1.4-7)



Subject: Text Box
Page Label: 82
Author: marisfry
Date: 10/23/2023 8:28:27 AM
Status:
Color: ■
Layer:
Space:

This figure should indicate new roadway extensions that are part of the preferred alternative.

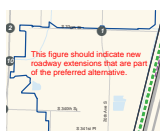


Subject: Text Box
Page Label: 82
Author: marisfry
Date: 10/23/2023 8:28:43 AM
Status:
Color: ■
Layer:
Space:

This figure shows intersection 10 as a new intersection, but intersection 10 no longer exists as part of the preferred alternative site plan based on Figure G1.1-2 and the roadway network description. If this driveway no longer exists, the volumes going through this intersection would need to be routed to other site access points and other study area intersections.

Additionally, this figure does not show intersection 11 (18th Place S Extension/S 336th Street), but intersection is included in the LOS tables. Finally, the intersections of 21st Avenue S/S 341st Place and 21st Avenue S Extension/S 344th Street should be included in the analysis as well as future volume figures.

Overall, the analysis provided does not sufficiently analyze the operational impacts of the preferred alternative.



Subject: Text Box
Page Label: 83
Author: marisfry
Date: 10/23/2023 8:29:36 AM
Status:
Color: ■
Layer:
Space:

This figure should indicate new roadway extensions that are part of the preferred alternative.



Subject: Text Box
Page Label: 83
Author: marisfry
Date: 10/24/2023 7:11:00 AM
Status:
Color: ■
Layer:
Space:

This figure shows intersection 10 as a new intersection, but intersection 10 no longer exists as part of the preferred alternative site plan based on Figure G1.1-2 and the roadway network description. If this driveway no longer exists, the volumes going through this intersection would need to be routed to other site access points and other study area intersections.

Additionally, this figure does not show intersection 11 (18th Place S Extension/S 336th Street), but intersection is included in the LOS tables. Finally, the intersections of 21st Avenue S/S 341st Place and 21st Avenue S Extension/S 344th Street should be included in the analysis as well as future volume figures.

It is also not clear how the rerouted vehicles from roadway closures are accounted for. For example, the no-build conditions show 85 vehicles exiting 20th Avenue S during the PM peak hour. However, there are only 15 additional right turns at intersection 1 and no additional left turns beyond project trips. While volumes for intersection 11 are not shown, based on the future volumes at intersection 1, it does not appear that additional trips are routed to intersection 11. If these trips would no longer exist due to land uses being removed, it is not clear from this analysis as no trip generation for existing land uses to be removed is provided. A figure showing how existing traffic was removed and rerouted should be included.

Overall, the analysis provided does not sufficiently analyze the operational impacts of the preferred alternative.

Item	Location	Intersection	Notes
1	SR 99/Driveway	Intersection 10	Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.

Subject: Callout
Page Label: 84
Author: marisfry
Date: 10/25/2023 2:52:37 PM
Status:
Color: ■
Layer:
Space:

Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.

INTERSECTION 10 (SR 99/DRIVEWAY) IS LONGER PROPOSED AS PART OF THE PREFERRED ALTERNATIVE.

Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.

Page G1-75 | Appendix G1: Transportation Technical R

Subject: Text Box
Page Label: 84
Author: marisfry
Date: 10/23/2023 8:32:55 AM
Status:
Color: ■
Layer:
Space:

Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.


Item	Location	Intersection	Notes
1	SR 99/Driveway	Intersection 10	Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.

Page G1-75 | Appendix G1: Transportation Technical R

Subject: Text Box
Page Label: 84
Author: marisfry
Date: 10/24/2023 6:49:44 AM
Status:
Color: ■
Layer:
Space:

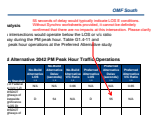
v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.




Subject: Text Box
Page Label: 85
Author: marisfry
Date: 10/23/2023 8:33:54 AM
Status:
Color: 
Layer:
Space:

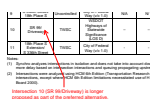
This figure should indicate the new roadway extensions that are part of the preferred alternative.


Additionally, new intersections and site driveways must be shown on the figure.



Subject: Callout
Page Label: 86
Author: marisfry
Date: 10/25/2023 2:50:59 PM
Status:
Color: 
Layer:
Space:


55 seconds of delay would typically indicate LOS E conditions. Without Synchro worksheets provided, it cannot be definitely confirmed that there are no impacts at this intersection. Please clarify.



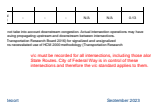
Subject: Callout
Page Label: 86
Author: marisfry
Date: 10/23/2023 8:35:24 AM
Status:
Color: 
Layer:
Space:


Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.



Subject: Text Box
Page Label: 86
Author: marisfry
Date: 10/23/2023 8:35:33 AM
Status:
Color: 
Layer:
Space:


Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.



Subject: Text Box
Page Label: 86
Author: marisfry
Date: 10/24/2023 6:49:50 AM
Status:
Color: 
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.



Subject: Text Box
Page Label: 87
Author: marisfry
Date: 10/23/2023 8:37:04 AM
Status:
Color: 
Layer:
Space:

This figure should indicate the new roadway extensions that are part of the preferred alternative.

Additionally, new intersections and site driveways must be shown on the figure.

It should be more clearly defined where and what bicycle and pedestrian improvements are proposed as part of the preferred alternative

The safety section should address if the project would impact intersections that already have a crash rate greater than 1.0 collisions per MEV.

Information regarding existing land uses to be removed and associated trip generation projections for those uses need to be provided in this section.

The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.

In addition to trip assignment, trip distribution figures should be included. Alternatively, trip distribution percentages could be illustrated on this figure (Figure G1.4-11)

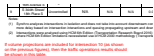
Intersection 10 is mislabeled for both AM and PM peak hours



Subject: Callout
Page Label: 91
Author: marisfry
Date: 10/24/2023 7:12:14 AM
Status:
Color: ■
Layer:
Space:

If Intersection 1 is only providing access to the Christian Faith Church under build conditions, and little to no project trips are projected it is unlikely that this intersection would observe as much traffic as it does today. This analysis does not sufficiently account for (or sufficiently document) traffic that would be rerouted from 20th Avenue S due to the closure. As such, this analysis may not adequately take into account additional impacts along SR 99 or 16th Street as a result.

More broadly, a figure showing how existing traffic was removed and rerouted should be included.



Page 61-40 | Appendix G1: Transportation Technical Report

Subject: Text Box
Page Label: 92
Author: marisfry
Date: 10/23/2023 8:45:44 AM
Status:
Color: ■
Layer:
Space:

If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.



Page 61-41 | Appendix G1: Transportation Technical Report

Subject: Text Box
Page Label: 92
Author: marisfry
Date: 10/24/2023 6:49:58 AM
Status:
Color: ■
Layer:
Space:

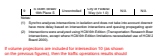
v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.



Page 61-42 | Appendix G1: Transportation Technical Report

Subject: Text Box
Page Label: 93
Author: marisfry
Date: 10/23/2023 8:47:30 AM
Status:
Color: ■
Layer:
Space:

If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown on this figure (Figure G1.4-13)



Page 61-43 | Appendix G1: Transportation Technical Report

Subject: Text Box
Page Label: 94
Author: marisfry
Date: 10/23/2023 8:47:45 AM
Status:
Color: ■
Layer:
Space:

If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.



Page 61-44 | Appendix G1: Transportation Technical Report

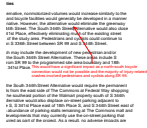
Subject: Text Box
Page Label: 94
Author: marisfry
Date: 10/24/2023 6:50:03 AM
Status:
Color: ■
Layer:
Space:

v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.



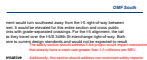
Subject: Text Box
Page Label: 95
Author: marisfry
Date: 10/23/2023 8:47:58 AM
Status:
Color: ■
Layer:
Space:

If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown on this figure (Figure G1.4-14)



Subject: Callout
Page Label: 96
Author: marisfry
Date: 10/24/2023 7:12:42 AM
Status:
Color: ■
Layer:
Space:

This would have a significant impact as a north-south bicycle connection would not be possible and the majority of injury-related crashes involved pedestrians and cyclists along SR 99.



Subject: Text Box
Page Label: 97
Author: marisfry
Date: 10/23/2023 8:49:56 AM
Status:
Color: ■
Layer:
Space:

The safety section should address if the project would impact intersections that already have a crash rate greater than 1.0 collisions per MEV.

Additionally, this section should address non-motorized safety impacts associated with eliminating a north-south non motorized connection.



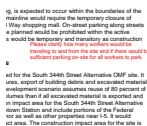
Subject: Text Box
Page Label: 108
Author: marisfry
Date: 10/24/2023 7:13:57 AM
Status:
Color: ■
Layer:
Space:

In addition to the impacts of truck activity, the impacts of trips related to workers traveling to and from the site should be quantified and discussed.



Subject: Callout
Page Label: 113
Author: marisfry
Date: 10/23/2023 8:53:55 AM
Status:
Color: ■
Layer:
Space:

Please clarify how long north-south connectivity would be impacted as pedestrians and cyclists would shift to SR 99 under this scenario.



Subject: Text Box
Page Label: 114
Author: marisfry
Date: 10/23/2023 8:54:40 AM
Status:
Color: ■
Layer:
Space:

Please clarify how many workers would be traveling to and from the site and if there would be sufficient parking on-site for all workers to park.

Small text block, likely a footnote or reference, containing several lines of text.

Small text block, likely a footnote or reference, containing several lines of text.

Subject: Text Box
Page Label: 131
Author: marisfry
Date: 10/24/2023 7:16:43 AM
Status:
Color: ■
Layer:
Space:

Consistent with the executive summary, the City's street vacation process should be referenced as an ongoing coordination effort related to the reconfiguration of the street network.

Desiree Winkler (2)

Small text block, likely a footnote or reference, containing several lines of text.

Small text block, likely a footnote or reference, containing several lines of text.

Subject: Text Box
Page Label: 8
Author: Desiree Winkler
Date: 10/27/2023 11:37:46 AM
Status:
Color: ■
Layer:
Space:

-an updated parking analysis for the WSDOT 320th/23rd Ave park and ride needs to be completed to support removal of parking spaces consistent with the FWLE EIS that assumed use of this park and ride for LINK/Regional Transit riders.

Small text block, likely a footnote or reference, containing several lines of text.

Small text block, likely a footnote or reference, containing several lines of text.

Subject: Text Box
Page Label: 64
Author: Desiree Winkler
Date: 10/27/2023 4:49:43 PM
Status:
Color: ■
Layer:
Space:

cannot look at one SR99 intersection in a vacuum as the entire corridor is coordinated.

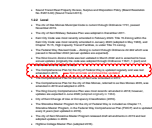
12-OMFS NEPA SEPA DEIS Appendix H Supporting Info for Tech Analyses.pdf Markup Summary

Chaney (17)



Subject: Cloud+
Page Label: 17
Author: Chaney
Date: 10/31/2023 3:06:06 PM
Status:
Color: ■
Layer:
Space:

Inaccurate and should be updated.



Subject: Cloud+
Page Label: 17
Author: Chaney
Date: 10/31/2023 3:06:13 PM
Status:
Color: ■
Layer:
Space:

Not accurate and should be updated



Subject: Cloud+
Page Label: 18
Author: Chaney
Date: 10/31/2023 3:10:01 PM
Status:
Color: ■
Layer:
Space:

Inaccurate, needs to be updated.

ne region. T
ed Street an

Subject: Line
Page Label: 18
Author: Chaney
Date: 10/31/2023 3:11:08 PM
Status:
Color: ■
Layer:
Space:

a Regional Growth
in the region. The
ferred Street and
site
the process of
ferred and

Subject: Text Box
Page Label: 18
Author: Chaney
Date: 10/31/2023 3:11:16 PM
Status:
Color: ■
Layer:
Space:

site

y
f
ns (City of
a city
transit.
is a
same
Growth
art. The
d and

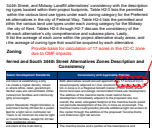
Subject: Callout
Page Label: 18
Author: Chaney
Date: 10/31/2023 3:12:22 PM
Status:
Color: ■
Layer:
Space:

The OMF site alternatives are not within the City Center



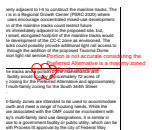
Subject: Cloud+
Page Label: 19
Author: Chaney
Date: 10/25/2023 12:18:27 PM
Status:
Color: ■
Layer:
Space:

this is outdated. Not mentioned here is the South Station Subarea Plan and the Countywide Growth Center Candidate Designation



Subject: Cloud+
Page Label: 20
Author: Chaney
Date: 10/31/2023 2:57:24 PM
Status:
Color: ■
Layer:
Space:

Provide basis for calculation of 17 acres in the CC-C zone due to OMF impacts.



Subject: Cloud+
Page Label: 20
Author: Chaney
Date: 10/31/2023 3:00:14 PM
Status:
Color: ■
Layer:
Space:

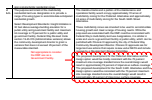
Portion is not accurate considering the Preferred Alternative is a majority zoned multifamily residential.



Subject: Cloud+
Page Label: 20
Author: Chaney
Date: 11/2/2023 4:41:16 PM
Status:
Color: ■
Layer:
Space:

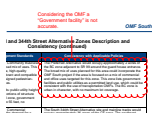
Considering the OMF a "Government facility" is not accurate. This statement is incorrect.

Light rail or commuter rail transit facility require a Process IV review in the CC-C & CE zones



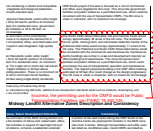
Subject: Cloud+
Page Label: 20
Author: Chaney
Date: 11/2/2023 4:38:34 PM
Status:
Color: ■
Layer:
Space:

Not appropriate to consider the OMF use as a Government Facility.



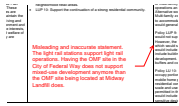
Subject: Cloud+
Page Label: 21
Author: Chaney
Date: 10/31/2023 3:03:13 PM
Status:
Color: ■
Layer:
Space:

Considering the OMF a "Government facility" is not accurate.



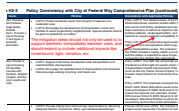
Subject: Cloud+
Page Label: 21
Author: Chaney
Date: 10/25/2023 12:34:59 PM
Status:
Color: ■
Layer:
Space:

Incorrect, the permitting use for the OMFS would be Public Transportation Facilities, per FWRC 19.240.135.



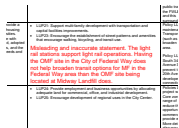
Subject: Callout
Page Label: 27
Author: Chaney
Date: 10/31/2023 3:38:41 PM
Status:
Color: ■
Layer:
Space:

Misleading and inaccurate statement. The light rail stations support light rail operations. Having the OMF site in the City of Federal Way does not support mixed-use development anymore than the OMF site being located at Midway Landfill does.



Subject: Callout
Page Label: 28
Author: Chaney
Date: 10/31/2023 3:37:22 PM
Status:
Color: ■
Layer:
Space:

The mitigation steps should not only be used to support aesthetic compatibility between uses, and should extend to include additional impacts like noise/sound, light, vibration, etc



Subject: Text Box
Page Label: 28
Author: Chaney
Date: 10/31/2023 3:39:40 PM
Status:
Color: ■
Layer:
Space:

Misleading and inaccurate statement. The light rail stations support light rail operations. Having the OMF site in the City of Federal Way does not help broaden transit options for MF in the Federal Way area than the OMF site being located at Midway Landfill does.



Subject: Cloud+
Page Label: 30
Author: Chaney
Date: 11/2/2023 4:36:12 PM
Status:
Color: ■
Layer:
Space:

Response provided for Policy LU40 is inappropriate. The policy is about the range of retail and supportive uses.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
1	<p><u>Alternatives Considered</u> Page 2-16</p> <ul style="list-style-type: none"> How can environmental impacts from TDLE be considered part of the "no-build" alternative if TDLE does not have an approved environmental document? 	<p>As stated in the Draft EIS, the No-Build Alternative represents the transportation system and environment as they would exist without the proposed project and provides a benchmark against which the build alternatives can be compared. It assumes the other Link light rail system improvements listed in Sound Transit 3 would be built, including extensions to West Seattle, Ballard, Everett, downtown Redmond, Issaquah, and Tacoma. The No-Build Alternative also assumes that the new North Corridor OMF would be constructed. Under the target schedule for Sound Transit's System Expansion Plan, each of these projects would be operating by 2042.</p>
2	<p>Page 3.2-8</p> <ul style="list-style-type: none"> 20th Avenue S is listed incorrectly as 20th Avenue E. Please address. 	<p>The error has been corrected in the Final EIS.</p>
3	<p>Page 3.2-12</p> <ul style="list-style-type: none"> Historical collision date was collected between January 2016 to December 2018. This should be updated with more current data. 	<p>The Final EIS relies on data from 2016 to 2018 as it provides a more conservative (higher) collision rate than data from 2020 and 2021, which reflect lower traffic volumes during the years of the COVID pandemic. As the project alternatives are not expected to result in impacts to traffic safety, the collision data do not have a bearing on decisions related to the alternatives.</p>
4	<ul style="list-style-type: none"> Intersections with a collision rate above 1.0 per MEV will need to be discussed in greater detail as to potential contributing factors. 	<p>As stated in Section 3.7 of Appendix G1, Transportation Technical Report, of the Final EIS no notable contributing factors were provided for the fatal and serious injury crashes for either of the study areas other than two due to driver inattention and one due to driver disregard for a traffic signal.</p>
5	<ul style="list-style-type: none"> Additionally, the societal cost per MEV must be provided in the collision summary tables and discussed. 	<p>Each OMF South alternative is analyzed with the same type of data and methodology to allow for an equal comparison among alternatives. Therefore, the societal cost of collisions per million entering vehicles (MEV) was not included in the analysis. The analysis assesses accidents currently occurring within the project limits for each alternative in terms of type, cause, and frequency in order to equally compare alternatives across jurisdictions, as described in the transportation section of the 2019 Environmental Technical Analysis Methods Report (Attachment G1-1 to Appendix G1, Transportation Technical Report, of the Final EIS) reviewed by the city of Federal Way in its capacity as a member of the Interagency Group.</p>
6	<p>Page 3.2-13</p> <ul style="list-style-type: none"> It is noted that the annual growth rate is based on the growth rate used for TDLE traffic studies, but please specify what the basis for the assumed TDLE annual growth rate was. Typically, a higher annual growth rate closer to 1.25 percent has been used in the City of Federal Way. 	<p>The annual growth rate used for the OMF South analysis (0.8 percent) was based on the Puget Sound Regional Council travel demand model used for TDLE. Although TDLE ended up using a 0.5 percent annual growth rate for their analysis, OMF South continued to use a 0.8 percent annual growth rate to take a more conservative approach. The growth rate represents an average rate over the next 20 years, accounting for higher than average growth in some years and lower than average growth in others.</p>

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
7	<ul style="list-style-type: none"> Was this signal timing optimization vetted with WSDOT and/or City of Federal Way? Are there other external factors outside of the study area that would impact the ability to optimize the signal timings? 	Optimizing signal timing is a standard practice based on the assumption that agencies will update their signal timing at some point in the next 20 years. The study team met with the City of Federal Way on July 28, 2022, during which city staff confirmed this approach.
8	Page 3.2-14 <ul style="list-style-type: none"> Routes 177 and 577 would still be faster than light rail for several years, so there will be opposition to discontinuing those routes. 	Comment acknowledged. Sound Transit and King County Metro would evaluate the need to continue or reduce bus service along I-5 between Seattle and Federal Way as the Link system expands and service needs change.
9	Page 3.2-16 <ul style="list-style-type: none"> A more comprehensive trip generation section needs to be provided in this report. The appendices do not include detailed calculations and the methodology outlined here does not match with the methodology outlined in the appendices (i.e. trip generation does not appear to account for delivery-related trips or other non-employee trips). 	Estimates for the number of employees arriving and departing the site were determined by Sound Transit based on forecast staffing levels. The amount of freight traffic to and from the OMF site is anticipated to be minimal, particularly during the AM and PM peak hours, as deliveries would occur during off-peak hours. Therefore, freight traffic was not included in trip generation estimates from OMF South operations. Section 3.2, Transportation, in the Final EIS and Section 4.2.1.1 of Appendix G1, Transportation Technical Report, were updated to clarify this.
10	<ul style="list-style-type: none"> Given that this is a long-range analysis, and that the evaluated alternatives result in major changes to the roadway network, it is not appropriate to base trip distribution assumptions on existing travel patterns alone. Trip distribution patterns should be based on the regional travel model and adjusted as needed based on changes to the roadway network. 	Travel demand modeling was not performed for this study. Many properties between S 336th Street and S 344th Street would be acquired as part of the OMF South project and the remaining trips that currently use 20th Avenue S were relocated. Given there are no other developments in the study area, it is reasonable to assume existing travel patterns to and from the study area would remain in the future.
11	Page 3.2-17 <ul style="list-style-type: none"> It cannot be definitely stated that no new safety issues would be introduced and no existing safety issues would be exacerbated. Particularly given the elimination of north-south connectivity for non-motorized traffic in the South 344th Street Alternative. 	Final EIS Section 3.2, Transportation, explains the reasons why the project is not expected to introduce new safety issues or exacerbate existing safety issues. If the South 344th Street Alternative were selected as the project to be built, Sound Transit would evaluate options for replacing the function of the greenway between S 336th Street and S 344th Street. Section 3.2.2.2, Long-Term Impacts (to Transportation), of the Final EIS has been updated to reflect this along with Section 4.2.3.6 of Appendix G1, Transportation Technical Report.
12	<ul style="list-style-type: none"> The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination. 	The Final EIS discusses Federal Way's street vacation process and requirements in Section 3.4, Land Use.
13	Page 3.2-18 <ul style="list-style-type: none"> The description of the new 18th Avenue S intersection is not consistent with the provided site plan. The description and if applicable, the associated analysis, should be updated. 	The intersection of 18th Place S would form an additional three-legged intersection with S 336th Street east of the three-legged intersection formed by 18th Avenue S and S 336th Street. It would not change the associated traffic analysis. This has been corrected in the Final EIS.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
14	<ul style="list-style-type: none"> Parking study needs to be updated from the FWLE EIS to be consistent with ability to remove stalls without replacement. Does this include stalls removed for S324th culvert and roadway grade construction? 	<p>The parking analysis does not include stalls removed for grading and culvert installation at S 324th Street, which is part of Federal Way's City Center Access project.</p> <p>The removal of parking spaces associated with OMF South, including from the South 320th Street Park & Ride, would not affect the accommodation of parking demand by FWLE. The Federal Way Link Extension EIS identified that parking demand from FWLE would be accommodated through the parking provided at the Kent Des-Moines, Star Lake, and Federal Way Downtown stations, with excess parking available at the S 272nd Star Lake Station.</p>
15	<p>Page 3.2-19 – Table 3.2-6</p> <ul style="list-style-type: none"> v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them. 	<p>SR 99 is a highway of statewide significance, so the intersections along SR 99 are measured against WSDOT standards for level of service (LOS). This is discussed in Section 3.2.1.2, Arterial and Street Operations, of the Final EIS. Using LOS standards for SR 99 intersections also allows an equal comparison of the impacts between OMF South alternatives in Kent and Federal Way.</p>
16	<ul style="list-style-type: none"> Intersection 10 (SR 99/Driveway) is no longer proposed as part of the preferred alternative. 	<p>This has been corrected in the Final EIS.</p>
17	<ul style="list-style-type: none"> Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-6. All new site driveways and new intersections resulting from roadway extensions must be provided in this table. 	<p>Gate operations are discussed in Final EIS Section 3.2.2.2, Long-Term Impacts. All new trips to/from south of the OMF South Preferred Alternative site are expected to travel through the western driveway with the guard shack and through intersections #5, #6, and #8. No trips are expected to travel through intersection #9, and no new trips are expected to travel along S 341st Street east of the guard shack, so no new trips are expected to travel through either the 21st Avenue S/S 341st Place or 21st Avenue S Extension/S 344th Street intersection.</p>
18	<p>Page 3.2-20 – Table 3.2-7</p> <ul style="list-style-type: none"> v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them. 	<p>Please see response to Comment ID 15.</p>
19	<ul style="list-style-type: none"> 55 seconds of delay would typically indicate LOS E conditions. Without Synchro worksheets provided, it cannot be definitely confirmed that there are no impacts at this intersection. Please clarify. 	<p>LOS E is defined as a delay of 60 to 80 seconds, as shown in Table 3.2-2 in Final EIS Section 3.2, Transportation. The traffic analysis has been updated for the Final EIS, and intersection #2 now has a delay of 49 seconds during the Preferred Alternative 2042 PM Peak Hour Traffic Operations (Table 3.2-7). The Synchro reports will be included with the Traffic Impact Report that will be submitted as part of the design review process during the final design phase of the project.</p>
20	<ul style="list-style-type: none"> Intersection 10 (SR 99/Driveway) is no longer proposed as part of the preferred alternative. 	<p>Please see response to Comment ID 16.</p>

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
21	<ul style="list-style-type: none"> Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-7. All new site driveways and new intersections resulting from roadway extensions must be provided in this table. 	Please see response to Comment ID 17.
22	<p>Page 3.2-21 and page 3.2-25 - Figure 3.2-7 and Figure 3.2-8</p> <ul style="list-style-type: none"> This figure should indicate the new roadway extensions that are part of the preferred alternative. <p>Additionally, new intersections and site driveways must be included in the analysis and shown on the figure.</p>	These figures have been updated in the Final EIS to show the new intersections and roadway extensions. Intersection #11 (18th Place S Extension/S 336th Street) has been included in the analysis in the Final EIS.
23	<p>Page 3.2-22</p> <ul style="list-style-type: none"> The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination. 	Please see response to Comment ID 12.
24	<p>Page 3.2-23 and page 3.2-24 - Table 3.2-8 and Table 3.2-9</p> <ul style="list-style-type: none"> v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them. 	Please see response to Comment ID 15.
25	<ul style="list-style-type: none"> If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table. 	Final EIS Appendix G1, Transportation Technical Report, and Section 3.2, Transportation, have been revised to remove intersection #10 from the South 344th Street Alternative analysis as it represents an intersection internal to the site. Tables 3.2-8 and 3.2-9 have been corrected.
26	<p>Page 3.2-26</p> <ul style="list-style-type: none"> This would have a significant impact as a north-south bicycle connection would not be possible and the majority of injury-related crashes involved ped and cyclists along SR 99. 	<p>The design for the South 344th Street Alternative has not been advanced beyond the conceptual design used for the 2021 SEPA Draft EIS, as stated in Section 2.2.8 of the Final EIS. If the South 344th Street Alternative were selected as the project to be built, Sound Transit would evaluate options for replacing the function of the greenway between S 336th Street and S 344th Street.</p> <p>Data provided in Section 3.7 of Appendix G1, Transportation Technical Report, in the Final EIS show that most injury-related collisions between 2016 and 2018 involved motor vehicles, not pedestrians and bicyclists.</p>
27	<p>Page 3.2-32 – Table 3.2-13</p> <ul style="list-style-type: none"> S 330th St is inappropriate for a haul route, as it is narrow, has a small traffic circle at 20th Ave S, and traverse's residential areas with some areas of high parking utilization. 	Comment acknowledged. Haul routes would be determined by the contractor during final design and coordinated with the City of Federal Way.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
28	Page 3.2-13 <ul style="list-style-type: none"> In addition to the impacts of truck activity, the impacts of trips related to workers traveling to and from the site should be quantified and discussed. 	The estimates for construction truck traffic were made to differentiate impacts between the three build alternatives and, particularly, between the three subsurface construction design options for the Midway Landfill Alternative. The number of construction workers traveling to and from the site cannot be estimated at this time because it would depend on several factors, primarily the construction means, methods, and schedule, which have not yet been determined.
29	<ul style="list-style-type: none"> Please clarify how many workers would be traveling to and from the site and if there would be sufficient parking on-site for all workers to park. 	The number of construction workers traveling to and from the site cannot be estimated at this time because it would depend on several factors, primarily the construction means, methods, and schedule, which have not yet been determined. However, Sound Transit would require the contractor to develop a construction transportation management plan to address construction employee parking in accordance with Federal Way requirements, as stated in Section 3.2.2.4, Avoidance and Minimization of Impacts, of the Final EIS.
30	Page 3.2-35 <ul style="list-style-type: none"> S 330th St is not an acceptable haul route. 	Please see response to Comment ID 27.
31	Page 3.2-42 <ul style="list-style-type: none"> Consistent with the executive summary, the City's street vacation process should be referenced as an ongoing coordination effort related to the reconfiguration of the street network for both Federal Way alternatives. 	Please see response to Comment ID 12.
32	<p>The following comments are related to Appendix C</p> <p>Page 1 Additional support information is needed related to access for the proposed driveways for the midway landfill alternative. Support information for the proposed driveway widths and geometry is needed. Channelization and median improvements are needed on Pacific Hwy to support the new accesses.</p>	Appendix C, Conceptual Design Drawings and Engineering Information, was intended to provide illustrative examples of the conceptual site designs for each OMF South alternative. The drawings are not to the level of detail required for formal submittals for permit approval and were not presented as such. Sound Transit has submitted design plans for the Preferred Alternative to Federal Way for review and will continue to address comments through ongoing design coordination should the Board select the Preferred Alternative or South 344th Street Alternative as the project to be built.
33	Page 11 <ul style="list-style-type: none"> The location of the track over/across the parking lot may impact the existing parking lot illumination. Evaluation and potential mitigation are needed as necessary. 	Please see response to Comment ID 32.
34	Page 12 <ul style="list-style-type: none"> The location of the track over/across the parking lot may impact the existing parking lot illumination. Evaluation and potential mitigation are needed as necessary. 	Please see response to Comment ID 32.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
35	<ul style="list-style-type: none"> Location of track over/across S 322nd St may impact driver visibility of existing traffic signal at S 322nd St/23rd Ave S intersection. Evaluate and mitigate, if needed. 	Please see response to Comment ID 32.
36	<ul style="list-style-type: none"> Location of track over/across 23rd Ave S may impact driver visibility of traffic signal at S 322nd St/23rd Ave S intersection. Evaluate and mitigate, if needed. 	Please see response to Comment ID 32.
37	Page 15 <ul style="list-style-type: none"> Set gate further from 24th Ave S so that access ST maintenance vehicles can pull completely out of the roadway when opening the gate. 	Please see response to Comment ID 32.
38	<ul style="list-style-type: none"> Clarity is needed for a section of asphalt shown on the plans along 24th Avenue S near S 333rd St. 	Please see response to Comment ID 32.
39	Page 16 <ul style="list-style-type: none"> A proposed column is shown within the intersection of Winged Foot Way and Burning Tree Blvd. A revised location shall be provided 	Please see response to Comment ID 32.
40	Page 17 and Page 19 <ul style="list-style-type: none"> Adjustment to the location of the proposed sidewalk, curb, and landscape strip for 24th Ave S is required. 	Please see response to Comment ID 32.
41	Page 22 <ul style="list-style-type: none"> Adjustment is needed for the access to the WSDOT stormwater facility at 21st Ave S and S 344th St. Update design to represent the intended roadway curve. Revise the access to driveway standards. 	Please see response to Comment ID 32.
42	Page 25 <ul style="list-style-type: none"> A 10-foot clear zone is required from roadway edge to face of proposed retaining walls. 	Please see response to Comment ID 32.
43	Page 27 <ul style="list-style-type: none"> On-street parking is shown along the proposed 18th Place S. On-street parking is allowed provided that it is outside the prescriptive sight triangle of the intersection and does not result in impacts to adjacent critical areas. 	Please see response to Comment ID 32.
44	<ul style="list-style-type: none"> S 341st Place is incorrectly shown as S 340th St. Please correct. 	Please see response to Comment ID 32.
45	Page 34 <ul style="list-style-type: none"> The location of the track over/across the parking lot may impact the existing parking lot illumination. Evaluation and potential mitigation are needed as necessary. 	Please see response to Comment ID 32.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
46	Page 37 <ul style="list-style-type: none"> More evaluation is needed for access needs for existing properties adjacent to the proposed S 344th St Site alternative. 	Please see response to Comment ID 32.
47	<ul style="list-style-type: none"> Additional sidewalk connectivity is needed for a portion of the removed S 341st Place. 	Please see response to Comment ID 32.
48	<p>The following comments are related to Appendix G1</p> <p>Overall Comments:</p> <p>The analysis provided does not adequately analyze the preferred and 344th Street alternatives as not all new driveways/intersections are included and/or incorrect driveways are included. Additionally, v/c must be recorded for all intersections including those along State Routes as the City of Federal Way controls these intersections.</p> <p>There is insufficient information provided related to the existing land uses removed and traffic rerouted as a result of vacated streets. Supplemental trip generation analysis and volume figures should be provided to illustrate how these conditions impact the future volumes.</p> <p>Without this information it is not possible to validate the future volumes provided. Additional attachments must be provided including detailed trip generation information for the OMF South site and existing land uses; traffic counts; and Synchro worksheets.</p> <p>An updated parking analysis for the WSDOT 320th/23rd Ave park and ride needs to be completed to support removal of parking spaces consistent with the FWLE EIS that assumed use of this park and ride for LINK/Regional Transit riders.</p>	These comments are addressed more specifically through responses to comments 49 through 97 below.
49	Page G1-i <ul style="list-style-type: none"> The summary states that impacts may occur if the delay in an LOS F condition is worsened by more than 10 seconds. Please clarify the basis for this standard as it is not specified in Attachment A. Additionally, the City of Federal Way standards should be referenced here since they are based on v/c rather than LOS/delay. 	As described in Section 3.2.3.1 in Final EIS Appendix G1, Transportation Technical Report, Sound Transit typically uses a 10-second or 10 percent additional delay threshold when determining whether mitigation is needed for intersections already operating at LOS F. This threshold is used because it represents the conditions when there would start to be a noticeable vehicle delay increase compared with the No-Build Alternative. The summary text has been corrected in the Final EIS to include Federal Way v/c standards.
50	Page G1-3 – Figure G1.1-2 <ul style="list-style-type: none"> The extension of 18th Place S is described as intersection S 336th Street as the fourth (NB) leg of the 18th Ave S/S 336th St intersection, but the conceptual site plan does not depict it in this way due to the creek. It is assumed that a four-leg intersection is not feasible here and therefore the description/analysis should be revised accordingly. 	The text has been revised in Section 4.2, Long-Term Impacts, in Final EIS Appendix G1, Transportation Technical Report, to reflect that the extension of 18th Place S would create a new three-legged intersection on the south side of S 336th Street.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
51	Page G1-20 <ul style="list-style-type: none"> In section 3.2.3 Traffic Volumes, please clarify what "as applicable" means for the adjusted 2022 traffic volumes. For instance, was volume balancing between intersections a key factor? 	Additional volume was added to select movements at intersections #2, #4, and #7 to account for the additional volume in 2022. This additional volume was distributed throughout the roadway system as applicable, meaning that this additional volume would not impact every intersection or movement. Volumes between intersections where there are no driveways was also balanced. Section 3.2.2 in Final EIS Appendix G1, Transportation Technical Report was updated to clarify this.
52	Page G1-21 – Figure G1.3-7 <ul style="list-style-type: none"> During the AM peak hour, existing volumes at intersections 6 and 9 have decreased as compared to the 2021 DEIS resulting in greater volume imbalances between intersections in some cases. Please explain the change from the 2021 DEIS to the 2023 ADEIS 	The AM peak hour volumes for intersections #6 and #9 used in the 2021 Draft EIS were incorrectly input. The updated volumes used for the transportation analysis in Appendix G.1, Transportation Technical Report, and Section 3.2, Transportation, in the Final EIS more accurately reflects the intersection counts collected in September 2019.
53	Page G1-29, G1-31, G1-58, and G1-60 – Table G1.3-9, Table G1.3-11, Table G1.4-1, and Table G1.4-3 <ul style="list-style-type: none"> v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them. 	Please see response to Comment ID 15.
54	Page G1-44 <ul style="list-style-type: none"> Under section 3.7 Safety, while it is acceptable to use collision data from 2016 to 2018 because collision data during the pandemic was atypical, many studies have found that collision rates were higher during the pandemic. Therefore, it may not be accurate to say that 2016 to 2018 collision data is more conservative 	The 2016 to 2018 data are more conservative than the collision data from 2020 and 2021 because the 2016 to 2018 data showed higher collision frequencies.
55	Page G1-55 <ul style="list-style-type: none"> Intersections with a collision rate above 1.0 per MEV will need to be discussed in greater detail as to potential contributing factors. <p>Additionally, the societal cost per MEV must be provided in the collision summary tables and discussed.</p>	Please see responses to Comment IDs 4 and 5.
56	Page G1-54 <ul style="list-style-type: none"> Under section 4.1.1.2 Traffic Volumes, it is noted that the annual growth rate is based on the growth rate used for TDLE traffic studies, but please specify what the basis for the assumed TDLE annual growth rate was. Typically, a higher annual growth rate closer to 1.25 percent has been used in the City of Federal Way. 	Please see response to Comment ID 6.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
57	Page G1-55 <ul style="list-style-type: none"> In the 2042 PM analysis there is a mention of a decrease in delay due to signal optimization. Was this signal timing optimization vetted with WSDOT and/or City of Federal Way? Are there other external factors outside of the study area that would impact the ability to optimize the signal timings? Additionally, you cannot look at one SR-99 intersection in a vacuum as the entire corridor is coordinated. 	Please see response to Comment ID 7.
58	Page G1-68 <ul style="list-style-type: none"> Given that this is a long-range analysis, and that the evaluated alternatives result in major changes to the roadway network, it is not appropriate to base trip distribution assumptions on existing travel patterns along. Trip distribution patterns should be based on the regional travel model and adjusted as needed based on changes to the roadway network. 	Please see response to Comment ID 10.
59	Page G1-69 <ul style="list-style-type: none"> A more comprehensive trip generation sections needs to be provided in this report. The appendices do not include detailed calculations and the methodology outlined here does not match with the methodology outlined in the appendices (i.e. trip generation does not appear to account for delivery-related trips or other non-employee trips). 	Please see response to Comment ID 9.
60	Page G1-70 <ul style="list-style-type: none"> Under section 4.2.1.5 Parking, please specify the approximate number of parking spaces this represents for each alternative. 	These streets do not have delineated parking spaces, so it is difficult to estimate the number of spaces lost. Final EIS Appendix G1, Transportation Technical Report, gives estimates in the Parking subsection under the discussion of Long-Term Impacts for each build alternative, when possible. In most cases, developments that may currently use the on-street parking that would be removed would be acquired as part of the project.
61	Page G1-71 <ul style="list-style-type: none"> Under section 4.2.1.6 Safety, this section should address the intersections with a collision rate over 1.0 collisions per MEV and discuss how the project may impact these locations. <p>Additionally, if north-south non-motorized facilities would not be feasible as part of the 344th Street Alternative, safety would not improve for non-motorized users and could in fact worsen. Please elaborate</p>	<p>As described in Section 4.2 of Final EIS Appendix G1, Transportation Technical Report, the OMF South alternatives are not expected to result in any safety impacts to roadway intersections in the study area, including those with a crash rate greater than 1.0 collision per MEV.</p> <p>As described in Appendix G1 Section 4.2.3.6, Nonmotorized Facilities, the South 344th Street Alternative would result in the removal of the greenway between S 336th Street and S 344th Street, which would eliminate an existing north-south nonmotorized connection. If the South 344th Street Alternative were selected as the project to be built, Sound Transit would evaluate options for replacing the function of the greenway between S 336th Street and S 344th Street.</p>

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
62	Page G1-72 <ul style="list-style-type: none"> The City of Federal Way's street vacation process should be referenced for both City of Federal Way alternatives as it relates to the currently proposed roadway network and potential ongoing coordination. 	Please see response to Comment ID 12.
63	<ul style="list-style-type: none"> In section 4.2.2.1 regarding the extension of 18th Place S there is a section indicating that it would convert the existing S 336th St/18th Avenue S intersection into a four-legged intersection. This is not consistent with the provided site plan. The description and if applicable, the associated analysis should be updated. 	Please see response to Comment ID 50.
64	<ul style="list-style-type: none"> Information regarding existing land uses to be removed and associated trip generation projections for those uses need to be provided in section 4.2.2.2 Traffic Volumes 	Section 4.2.2.2, Traffic Volumes, has been updated in Final EIS Appendix G1, Transportation Technical Report, to provide more information about trip generation projections for the Preferred Alternative and includes two new figures, Figures G1.4-7 and G1.4-8, that show existing trips to be removed and projected rerouted trips from roadway closures, respectively. Appendix G1 Section 4.2.3.2, Traffic Volumes has been similarly updated for the South 344th Street Alternative.
65	Page G1-73 – Figure G1.4-7 <ul style="list-style-type: none"> In addition to trip assignment, trip distribution figures should be included. Alternatively, trip distribution percentages could be illustrated on this figure (Figure G1.4-7). 	Figures G1.4-7 and G1.4-8 in Final EIS Appendix G1, Transportation Technical Report, have been added that show existing trips to be removed and projected rerouted trips from roadway closures, respectively. (Figures G1.4-7 and G1.4-8 have been renumbered as Figures G1.4-9 and G1.4-10, respectively.)
66	<ul style="list-style-type: none"> This figure should indicate new roadway extensions that are part of the preferred alternative. 	This figure, now labeled Figure G1.4-9, has been updated in Final EIS Appendix G1, Transportation Technical Report to show the new intersections and roadway extensions.
67	<ul style="list-style-type: none"> This figure shows intersection 10 as a new intersection, but intersection 10 no longer exists as part of the preferred alternative site plan based on Figure G1.1-2 and the roadway network description. If this driveway no longer exists, the volumes going through this intersection would need to be routed to other site access points and other study area intersections. 	This figure, now labeled Figure G1.4-9, has been corrected in the Final EIS.
68	Additionally, this figure does not show intersection 11 (18th Place S Extension/S 336th Street), but intersection is included in the LOS tables.	Intersection #11 has been added to this figure in Final EIS Appendix G1, Transportation Technical Report, now Figure G1.4-9.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
	<p>Finally, the intersections of 21st Avenue S/S 341st Place and 21st Avenue S Extension/S 344th Street should be included in the analysis as well as future volume figures.</p> <p>Overall, the analysis provided does not sufficiently analyze the operational impacts of the preferred alternative.</p>	<p>All new trips to/from south of the OMF South Preferred Alternative site are expected to travel through the western driveway with the guard shack and through intersections #5, #6, and #8. No trips are expected to travel through intersection #9, and no new trips are expected to travel along S 341st Street east of the guard shack, so no new trips are expected to travel through either the 21st Avenue S/S 341st Place or 21st Avenue S Extension/S 344th Street intersection.</p>
69	<p>Page G1-74 – Figure G1.4-8</p> <ul style="list-style-type: none"> This figure should indicate new roadway extensions that are part of the preferred alternative. 	<p>This figure, now labeled Figure G1.4-10, has been updated in Final EIS Appendix G1, Transportation Technical Report to show the new intersections and roadway extensions.</p>
70	<ul style="list-style-type: none"> This figure shows intersection 10 as a new intersection, but intersection 10 no longer exists as part of the preferred alternative site plan based on Figure G1.1-2 and the roadway network description. If this driveway no longer exists, the volumes going through this intersection would need to be routed to other site access points and other study area intersections. 	<p>This figure, now labeled Figure G1.4-10, has been corrected in Final EIS Appendix G1, Transportation Technical Report</p>
71	<p>Additionally, this figure does not show intersection 11 (18th Place S Extension/S 336th Street), but intersection is included in the LOS tables.</p>	<p>Intersection #11 has been added to this figure, now labeled Figure G1.4-10 in Final EIS Appendix G1, Transportation Technical Report.</p>
72	<p>Finally, the intersections of 21st Avenue S/S 341st Place and 21st Avenue S Extension/S 344th Street should be included in the analysis as well as future volume figures.</p>	<p>Please see response to Comment ID 68.</p>
73	<p>It is also not clear how the rerouted vehicles from roadway closures are accounted for. For example, the no-build conditions show 85 vehicles exiting 20th Avenue S during the PM peak hour. However, there are only 15 additional right turns at intersection 1 and no additional left turns beyond project trips. While volumes for intersection 11 are not shown, based on the future volumes at intersection 1, it does not appear that additional trips are routed to intersection 11. If these trips would no longer exist due to land uses being removed, it is not clear from this analysis as no trip generation for existing land uses to be removed is provided. A figure showing how existing traffic was removed and rerouted should be included.</p> <p>Overall, the analysis provided does not sufficiently analyze the operational impacts of the preferred alternative.</p>	<p>Please see response to Comment ID 64.</p>
74	<p>Page G1-75 – Table G1.4-10</p> <ul style="list-style-type: none"> Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative. 	<p>Table G1.4-10 has been corrected in Final EIS Appendix G1, Transportation Technical Report.</p>

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
75	<ul style="list-style-type: none"> v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them. 	Please see response to Comment ID 15.
76	<ul style="list-style-type: none"> Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table. 	Gate operations are discussed in Section 4.2, Long-Term Impacts, in Final EIS Appendix G1, Transportation Technical Report. All new trips to/from south of the OMF South Preferred Alternative site are expected to travel through the western driveway with the guard shack and through intersections #5, #6, and #8. No trips are expected to travel through intersection #9, and no new trips are expected to travel along S 341st Street east of the guard shack, so no new trips are expected to travel through either the 21st Avenue S/S 341st Place or 21st Avenue S Extension/S 344th Street intersection.
77	<p>Page G1-76 and G1-78 – Figure G1.4-9 and Figure G1.4-10</p> <ul style="list-style-type: none"> This figure should indicate the new roadway extensions that are part of the preferred alternative. Additionally, new intersections and site driveways must be shown on the figure. 	These figures, now labeled Figures G1.4-11 and G1.4-12, have been updated in Final EIS Appendix G1, Transportation Technical Report, to show the new site driveways, intersections, and roadway extensions.
78	<p>Page G1-77 – Table G1.4-11</p> <ul style="list-style-type: none"> 55 seconds of delay would typically indicate LOS E conditions. Without Synchro worksheets provided, it cannot be definitely confirmed that there are no impacts at this intersection. Please clarify. 	Please see response to Comment ID 19.
79	<ul style="list-style-type: none"> Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative. 	Table G1.4-11 in Final EIS Appendix G1, Transportation Technical Report, has been corrected by removing intersection #10.
80	<ul style="list-style-type: none"> v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them. 	Please see response to Comment ID 15.
81	<ul style="list-style-type: none"> Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table. 	Please see response to Comment ID 76.
82	<p>Page G1-79</p> <ul style="list-style-type: none"> In section 4.2.2.6 Nonmotorized Facilities, it should be more clearly defined where and what bicycle and pedestrian improvements are proposed as part of the preferred alternative. 	Section 4.2.2.6, Nonmotorized Facilities, in Final EIS Appendix G1, Transportation Technical Report, describes the proposed nonmotorized facilities for the Preferred Alternative based on the current preliminary design. If the Preferred Alternative is selected as the project to be built, these facilities will be more clearly defined as design progresses in coordination with Federal Way.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
83	<ul style="list-style-type: none"> In section 4.2.2.8 Safety, the safety section should address if the project would impact intersections that already have a crash rate greater than 1.0 collisions per MEV. 	Please see response to Comment ID 61.
84	Page G1-80 <ul style="list-style-type: none"> In section 4.2.3.2 Traffic Volumes, information regarding existing land uses to be removed and associated trip generation projections for those uses need to be provided in this section. 	Please see response to Comment ID 64.
85	Page G1-81 – Figure G1.4-11 <ul style="list-style-type: none"> In addition to trip assignment, trip distribution figures should be included. Alternatively, trip distribution percentages could be illustrated on this figure (Figure G1.4-11). 	Figures G1.4-13 and G1.4-14 in Final EIS Appendix G1, Transportation Technical Report, have been added that show existing trips to be removed and projected rerouted trips from roadway closures, respectively. (Figures G1.4-11 and G1.4-12 have been renumbered as Figures G1.4-15 and G1.4-16, respectively.)
86	Page G1-82 – Figure G1.4-12 <ul style="list-style-type: none"> Intersection 10 is mislabeled for both AM and PM peak hours. 	Final EIS Appendix G1, Transportation Technical Report, and Section 3.2, Transportation, have been revised to remove intersection #10 from the South 344th Street analysis because it represents an intersection internal to the site. This figure, now labeled G1.4-16, has been corrected to remove intersection #10 from the analysis.
87	<ul style="list-style-type: none"> If Intersection 1 is only providing access to the Christian Faith Church under build conditions, and little to no project trips are projected it is unlikely that this intersection would observe as much traffic as it does today. This analysis does not sufficiently account for (or sufficiently document) traffic that would be rerouted from 20th Avenue S due to the closure. As such, this analysis may not adequately consider additional impacts along SR 99 or 16th Street as a result. <p>More broadly, a figure showing how existing traffic was removed and rerouted should be included.</p>	Section 4.2.3.2 in Final EIS Appendix G1, Transportation Technical Report explains that existing trips from properties that would be acquired were removed and existing trips that would be rerouted due to changes in the roadway network were rerouted to other intersections or intersection movements. The existing trips from properties that would be acquired and the existing trips that would be rerouted due to changes in the roadway network are shown in Appendix G1 Figures G1.4-13 and G1.4-14, respectively.
88	Page G1-83 and G1-85 – Table G1.4-12 and Table G1.4-13 <ul style="list-style-type: none"> If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table. 	Tables G1.4-12 and G1.4-13 in Final EIS Appendix G1, Transportation Technical Report, have been corrected to remove intersection #10 from the analysis.
89	<ul style="list-style-type: none"> v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them. 	Please see response to Comment ID 15.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
90	Page G1-84 – Figure G1.4-13 <ul style="list-style-type: none"> If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown on this figure (Figure G1.4-13). 	This figure, now labeled G1.4-17 in Final EIS Appendix G1, Transportation Technical Report, has been corrected to remove intersection #10 from the analysis.
91	Page G1-86 – Figure G1.4-14 <ul style="list-style-type: none"> If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown on this figure (Figure G1.414). 	This figure, now labeled Figure G1.4-18 in Final EIS Appendix G1, Transportation Technical Report, has been corrected to remove intersection #10 from the analysis.
92	Page G1-87 <ul style="list-style-type: none"> In section 4.2.3.6 Nonmotorized Facilities, if the alternative eliminates the greenway between S 336th Street and S 344th Street this would have a significant impact as a north-south bicycle connection would not be possible and the majority of injury-related crashes involved pedestrians and cyclists along SR 99. 	Please see responses to Comment IDs 61 and 26.
93	Page G1-88 <ul style="list-style-type: none"> In section 4.2.3.8 Safety, the safety section should address if the project would impact intersections that already have a crash rate greater than 1.0 collisions per MEV. Additionally, this section should address non-motorized safety impacts associated with eliminating a north-south non-motorized connection. 	Please see response to Comment ID 61.
94	Page G1-99 <ul style="list-style-type: none"> In section 4.3.11 Estimation of Construction Truck Traffic, in addition to the impacts of truck activity, the impacts of trips related to workers traveling to and from the site should be quantified and discussed. 	Please see response to Comment ID 28.
95	Page G1-104 <ul style="list-style-type: none"> In section 4.3.1.6 Impacts to Nonmotorized Facilities, please clarify how long north-south connectivity would be impacted as pedestrians and cyclists would shift to SR 99 under this scenario. 	Based on the anticipated construction schedule, the greenway currently along 20th Avenue S could be impacted for over 4 years. However, as stated in Final EIS Section 3.2.2.4, Avoidance and Minimization of Impacts (to Transportation), and Section 4.4, Avoidance and Minimization Measures, of Appendix G1, Transportation Technical Report, Sound Transit would require the contractor to develop a construction transportation management plan to address site access and traffic control, including for bicycles and pedestrians, in accordance with Federal Way requirements.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
96	Page G1-105 <ul style="list-style-type: none"> In Section 4.3.1.7 Impacts to Parking, please clarify how many workers would be traveling to and from the site and if there would be sufficient parking on-site for all workers to park. 	Please see response to Comment ID 29.
97	Page G1-122 <ul style="list-style-type: none"> In section 4.7 Long Term Mitigation Measures, consistent with the executive summary, the City's street vacation process should be referenced as an ongoing coordination effort related to the reconfiguration of the street network. 	Please see response to Comment ID 12.
98	<u>Social Resources, Community Facilities, and Neighborhoods</u> Page 3.6-8 <ul style="list-style-type: none"> Belmor is a manufactured home community, zoned multifamily residential. 	The sentence has been revised in Section 3.6.2.2 of the Final EIS to reflect this comment.
99	<ul style="list-style-type: none"> Clarification is needed on the expected displaced residences. Provide methodology for calculating impacted residents and provide addresses. 	As described in Section 3.3, Acquisitions, Displacements, and Relocations, of the Final EIS, Sound Transit used King County Assessor's data and aerial imagery in combination with the project operational and construction footprints to determine potential property impacts and displacements. In most cases, where the OMF South project footprint overlapped with a building (e.g., residence), it was assumed that the use would be displaced. The level of acquisition discussed in the EIS is provided for comparing alternatives. Estimates of displaced properties reflect the condition at the time the analysis was conducted. Because property uses change over time, the number and/or type of displacements could vary between what is described in the Final EIS and what would be required. Appendix H1, Potentially Affected Parcels, includes a table and maps showing the potentially affected parcels for each OMF South build alternative.
100	<ul style="list-style-type: none"> What analysis went in to this conclusion? Airtime Aviation, Inc. is located in a custom designed building for the use. The impact to this business and others like it is inadequately evaluated. 	The referenced text concerns the impacts of the Preferred Alternative to community cohesion. The Final EIS concludes that the displacement of businesses from the Preferred Alternative would not impact community cohesion due to the small size of the businesses and relative abundance of similar types of businesses in the study area.
101	Page 3.6-11 <ul style="list-style-type: none"> In the environmental justice summary; country of origin and immigration status should also be considered. 	The EJ analysis follows Executive Order 12898, U.S. Department of Transportation (DOT) Order on Environmental Justice, and the FTA Circular C-403.1. It uses definitions from the DOT order to define minority and low-income persons which are described in Section 1.1 of Final EIS Appendix E, Environmental Justice Assessment. FTA does not use country of origin or immigration status in its definition of EJ populations.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
102	<p><u>Economic and Fiscal Impacts</u></p> <p>Page 3.5-1</p> <ul style="list-style-type: none"> Clarification is required if the entire dataset in Section 3.5 "Economics" was calculated using King County level datasets or specific South King County Data Sets. South King County is defined as: Renton, Tukwila, SeaTac, Burien, Des Moines, Normandy Park, Kent, Auburn, and Federal Way. 	<p>As stated in Final EIS Section 3.5, Economics, regional economic activity, such as jobs and labor income, was evaluated for the Puget Sound region, including King, Kitsap, Pierce, and Snohomish counties. Potential displacement of business activity and tax revenues were evaluated at the city level for Federal Way and Kent. Economic data specific to only King County were not used in the evaluation.</p>
103	<ul style="list-style-type: none"> Using King County macro level data is not representative of the economic landscape of South King County as it relates to wages, demographics, type & size of industry, etc 	<p>See response to Comment ID 102.</p>
104	<p><u>Land Use Impacts</u></p> <p>There appear to be unaccounted for impacts from the preferred and S 344th St Alternatives related to affected parking, impacted businesses, and number of employees displaced. These need to be addressed.</p> <p>The use of the OMF site is inconsistent with the City's urbanizing vision. Address the lack of planning for a smaller footprint for the facility or planning for mixed use by either placing parking in structures thereby allowing for other use of a portion of the property or the use by others of air rights above any of the planned facilities. The possibility of such a project could offset the economic impact of prohibiting the development of 60 acres of strategically located commercial land to its highest and best use.</p> <p>Specific comments include:</p>	<p>These comments are addressed more specifically through responses to comments 105 through 107 below.</p>
105	<p>Page ES-11 Figure ES-4</p> <ul style="list-style-type: none"> Apparent unaccounted for impact from the Preferred Alternative to the parking/loading in the northeast corner of the Spectrum Business Park. The EIS should determine if the required parking for the uses at the Spectrum Business Park will be impacted, reduced, or result in any non-conformance. 	<p>The reconstruction of S 340th Street (a private road) could require a temporary construction easement through the northeast corner of Spectrum Business Park. Neither the Preferred nor South 344th Street alternatives are anticipated to permanently impact parking or loading zones. The Spectrum Business Park is listed as a potentially affected parcel in Final EIS Appendix H-1.</p>

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
106	<p>Page ES-19</p> <ul style="list-style-type: none"> How was this calculated? What are the exact businesses that are being displaced? Is there a spreadsheet of this information? According to Washington State Department of Revenue there are significantly more 6 active business licenses that will be impacted. This misrepresentation also applies to the South 344th Street Alternative. 	<p>As stated in Section 3.3, Acquisitions, Displacements, and Relocations, of the Final EIS, Sound Transit used a geographic information system (GIS) to compare the proposed OMF South alternatives with King County parcel data and high-resolution aerial imagery to determine potential acquisitions and displacements for each build alternative. The potentially affected businesses were identified through King County assessor data and verified through windshield surveys, when possible, consistent with the EIS methodology reviewed by the city of Federal Way. As stated in Section 3.3, the level of acquisitions discussed provides information for comparing alternatives. Estimates of displaced properties reflect the conditions at the time the analysis was conducted. Because property uses change over time, the number and/or type of displacements could vary between what is disclosed in the Final EIS and what would be acquired.</p>
107	<ul style="list-style-type: none"> Provide methodology for how the number of employees impacted was calculated. These numbers do not accurately reflect the true number of active businesses that may be impacted and the actual number of impacted employees are likely underrepresented. 	<p>As explained in Final EIS Section 3.5, Economics, Table 3.5-5, Property Acquisition Impacts on Businesses and Employees (note 3), the number of displaced employees is based on the business building size (King County Department of Assessment data) and the type of business activity using square-foot-per-employee factors from the U.S. Department of Energy and the Institute for Transportation Engineers and not on an actual survey of businesses. The analysis for estimating employees assumes that the businesses are not abandoned or vacant.</p>
108	<p>The following comments are related to Appendix C</p> <p>Page 23</p> <ul style="list-style-type: none"> Activation Zone parking spaces are not shown on this map, but shown in others. Plans should be consistent. 	<p>Please see response to Comment ID 32.</p>
109	<ul style="list-style-type: none"> This is the only time in the entire DEIS that the Activation Zone is mentioned, but does not include square footage, uses, benefits, impacts, etc. Additional information for the activation zone is required. 	<p>Please see response to Comment ID 32.</p>
110	<ul style="list-style-type: none"> Any impacts to existing uses shall be addressed including parking stall or loading zone displacement. The OMFS site shall not create any nonconformities. 	<p>Please see response to Comment ID 32.</p>
111	<ul style="list-style-type: none"> Maps should be consistent and the impacts to adjacent uses must be measured. It appears Spectrum Business Park parking is being displaced here. Provide more information on how these impacts will be mitigated and the creation of any nonconformities will be avoided. 	<p>Please see response to Comment ID 32.</p>

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
112	Page 27 <ul style="list-style-type: none"> The activation zone should serve multi-modal travelers, including those arriving via vehicle. There must be parking available for the activation zone. 	Please see response to Comment ID 32.
113	<p>The Following comments are related to Appendix H2</p> Page H2-2 <ul style="list-style-type: none"> The reference information for the Federal Way Revised Code and Federal Way Comprehensive Plan are inaccurate and should be updated to reflect the current standards. 	Section 1.2.2 of Final EIS Appendix H2, Land Use Technical Appendix, has been updated to reflect the current dates for local codes and comprehensive plans.
114	Page H2-3 <ul style="list-style-type: none"> The preferred and South 344th St alternatives reference some smaller areas within the City Center Core land use designation. This is inaccurate and needs to be updated. 	The mainline tracks are included as an element of both the Preferred and South 344th Street alternatives. The mainline tracks for both alternatives extend into The Commons at Federal Way mall and the S 320th Street Park & Ride, which are zoned City Center Core.
115	Page H2-4 <ul style="list-style-type: none"> The section concerning the Tacoma Dome Link Extension is outdated and needs revision. Not mentioned here is the South Station Subarea Plan and the Countywide Growth Center Candidate Designation which should be included. 	Appendix H2, Land Use Technical Appendix, has been revised in the Final EIS to include mention of the Countywide Growth Center Candidate designation and South Station Subarea Plan.
116	Page H2-5 – Table H2-1 <ul style="list-style-type: none"> Please provide basis for calculation of 17 acres in the CC-C zone due to OMF impacts. 	Acreages were calculated using GIS, overlaying the project boundaries on the zoning map.
117	<ul style="list-style-type: none"> For the section concerning City of Federal Way Zone (RM-2400 and RM-3600: Multi-Family), it is not accurate to consider only a portion of the site as zoned multi-family. The preferred alternative is a majority zoned multi-family residential. Additionally, it is not appropriate to consider the OMF use as a Government Facility. Light rail or commuter rail transit facility require a Process IV review in the CC-C & CE zones. 	<p>Consistent with the comment, Section 1.3.1 of Appendix H2, Land Use Technical Appendix, to the Final EIS states, "The Preferred and South 344th Street alternatives are primarily within the Multi-Family Residential (RM) land use designation, in addition to smaller areas within Commercial Enterprise (CE), City Center Core (CC-C), and Commercial Business (CB) designations."</p> <p>Table H2-1 in Appendix H2, Land Use Technical Appendix, to the Final EIS has been updated to remove reference to the OMF as a government facility in the RM-2400 and RM-3600 zones and notes that it would be permitted as an essential public facility.</p>
118	Page H2-6 – Table H2-1 <ul style="list-style-type: none"> For the BC: Community Business and CE: Commercial Enterprise zones, the permitting use for the OMFS would be Public Transportation Facilities, per FWRC 19.240.135. Considering the OMF a "Government facility" is not accurate. 	Table H2-1 in Appendix H2, Land Use Technical Appendix, to the Final EIS has been updated to remove reference to the OMF as a government facility in the BC and CE zones. The table notes that the OMF would be permitted as a light rail or commuter rail transit facility in the CE zone and as an essential public facility in the BC zone.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
119	Page H2-12 – Table H2-5 <ul style="list-style-type: none"> Under Policy LUP 9, the statement that the OMFS site supports light rail operation which would support mixed use development is misleading and inaccurate. The light rail stations support light rail operations. Having the OMF site in the City of Federal Way does not support mixed-use development any more than the OMF site being located at Midway Landfill does. 	Reference to LUP9 has been deleted from Final EIS Appendix H2, Land Use Technical Appendix.
120	Page H2-13 – Table H2-5 <ul style="list-style-type: none"> Under Topic 2.7 Land Use Designations (Single Family). For Policy LUP14, the mitigation steps should not only be used to support aesthetic compatibility between uses, and should extend to include additional impacts like noise/sound, light, vibration, etc. 	The environmental analysis did not identify any noise, vibration, or light impacts to adjacent residents from operation of the OMF site. Please see Section 3.9, Noise and Vibration, and Section 3.7, Visual and Aesthetic Resources, of the Final EIS.
121	<ul style="list-style-type: none"> Under Topic 2.7 Land Use Designations (Multi-Family). It is inaccurate to state that this project helps broaden transit options for multi-family households in the Federal Way area. The light rail stations support light rail operations. Having the OMF site in the City of Federal Way does not help broaden transit options for MF in the Federal Way area. 	The proposed project supports Sound Transit's goals to expand Link light rail service at planned service levels, including that provided by TDLE, which includes a station in South Federal Way. OMF South is necessary to support continued expansion of light rail service south through Federal Way to Tacoma.
122	Page H2-15 – Table H2-5 <ul style="list-style-type: none"> The response provided for consistency with comprehensive Plan Policy LU40 is inappropriate. The policy is about the range of retail and supportive uses. 	Comment acknowledged. The discussion of LU40 was removed from Final EIS Appendix H2, Land Use Technical Appendix.
123	<u>Visual and Aesthetic Resources</u> Page 3.7-7 <ul style="list-style-type: none"> The i5 and Pac Hwy corridor in Federal Way consists of significant asphalt surfacing, removing trees within this area will have an increasingly negative impact on the City's urban heat index and citywide tree canopy coverage. Impacts to the urban heat index and the citywide tree canopy coverage should be evaluated between alternatives. Tree planting to meet the average Citywide canopy (35%) should be a target for this facility, if located in Federal Way. 	Section 3.10, Ecosystems, of the Final EIS discusses the impacts associated with vegetation removal. Analysis of impacts to the urban heat index is not required by NEPA or SEPA and is not part of the methodology for the EIS that was reviewed by the city.
124	Page 3.7-11 – Figure 3.7-6 <ul style="list-style-type: none"> The image shows redirected power lines. Confirm if this was intentional? Will they be redirected? 	The power lines would be relocated.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
125	Page 3.7-16 – Figure 3.7-12 <ul style="list-style-type: none"> The photo for the existing condition and simulation of proposed conditions appear to be the same. Confirm that no visual change is expected. 	This Key Observation Point was selected because it is a major intersection near a site that would have a relatively large number of viewers. In the far right of the simulation, there is a new building shown.
126	Page 3.7-17 – Figure 3.7-14 <ul style="list-style-type: none"> A cell tower appears to be removed in the simulation of proposed conditions. Confirm this removal and provide mitigation method for tower if removal is expected. 	The tower is a broadcasting tower associated with the former office of Trinity Broadcasting, which no longer operates at this location.
127	Noise and Vibration Page 3.9-7 <ul style="list-style-type: none"> Confirm the methodology and noise sources used in the noise analysis. Were the maintenance activity and testing of horns noise generators included in the projections? 	As described in Final EIS Section 3.9, Noise and Vibration, and Appendix G2, Noise and Vibration Technical Report, Sound Transit modeled noise-generating activities that could be expected at the OMF site itself and on the mainline and test tracks. Noise and vibration from facility and mainline track operations were modeled using the methods described in the 2018 FTA Transit Noise and Vibration Impact Assessment Manual (FTA Report No. 0123). Noise-generating activities would include vehicles moving within the facility, vehicle washing and drying, a traction power substation, vehicles moving on the mainline track (for the Preferred Alternative and the S 344th Street Alternative) into service in the morning and back to the facility in the late evening, and operations on the test track. This included limited testing of train bells and horns. See Final EIS Section 3.9.2.2, Long-Term Impacts, Preferred Alternative.
128	<ul style="list-style-type: none"> The evaluation of noise impacts shall measure and account for any increase in ambient Interstate 5 noise resulting from tree removal and sound barrier as part of the track construction for both the preferred and S 344th alternatives. 	Potential impacts to noise walls are discussed in Final EIS Section 3.9, Noise and Vibration, under Section 3.9.2.2, Long-Term Impacts, Preferred Alternative. Modification of the existing berm and noise walls adjacent to I-5 would result in traffic noise impacts at about one to three residences in Belmor. Sound Transit would provide traffic noise mitigation measures where traffic noise levels are predicted to be above the 2042 No-Build levels from removal of the existing berm and noise wall. The limited number of tree removals would have no effect on noise levels.
129	Ecosystems and Resources Page 3.10-26 <ul style="list-style-type: none"> Language indicates that 'frontage improvements along S 336th Street to meet city standards may necessitate the installation of a replacement structure where West Fork Hylebos Tributary is crossed by the road.' This should be changed to 'must replace the culvert.' 	Section 3.10, Ecosystem Resources, in the Final EIS has been clarified to say that the frontage improvements along S 336th Street would necessitate the installation of a replacement culvert at the crossing of West Fork Hylebos Tributary. Final design would confirm whether that specific structure would be affected and require replacement.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
130	Page 3.11-12 <ul style="list-style-type: none"> Any impacts to wetlands related to the extension of 18th Place S shall be eliminated or demonstrated to the City that impacts have been minimized and mitigated. 	Sound Transit will comply with all regulations concerning potential impacts to wetlands, including the federal 404(b)(1) analysis required by the Clean Water Act and City of Federal Way critical area ordinances. Avoidance and minimization of impacts will be part of the mitigation sequencing used during design and permitting of the project.
131	Page 3.11-19 <ul style="list-style-type: none"> Any impacts to wetlands related to the extension of 18th Place S shall be eliminated or demonstrated to the City that impacts have been minimized and mitigated. 	Please see the response to Comment ID 130.
132	<u>Cumulative Effects</u> Page 4-3 <ul style="list-style-type: none"> There is a large tree canopy with mature trees that will be heavily impacted by the proposed 18th Place S extension as part of the preferred alternative. Currently as proposed neither OMFS sites in Federal Way will meet Tree retention requirements. Please address. 	Potential impacts to vegetation are addressed in Section 3.10, Ecosystem Resources, and Section 3.7, Visual and Aesthetic Resources, in the Final EIS. If the Preferred Alternative is selected as the project to be built, Sound Transit will continue to work with Federal Way regarding city development requirements.
133	Page 4-8 <ul style="list-style-type: none"> Within section 4.1 under transportation, the City Center Access Project for Federal Way is described as unfunded. This is incorrect, the construction phase is currently unfunded however the design and right of way is funded. Please adjust. 	Section 4.4.1, Transportation, in Chapter 4, Cumulative Effects Analysis, in the Final EIS has been revised to reflect this comment.
134	Other sections of the report reference 610 jobs, rather than 470 jobs	The correction has been made to the Final EIS Fact Sheet.
135	City center access received funding for phase 1 design and ROW. I believe the Triangle Project also has current design funding.	The Final EIS has been modified to reflect this comment.
136	Why does the OMF site need to accommodate all of these LRVs when another OMF site is being planned for in the north. How is the OMF capacity being balanced across sites. A reduction in the minimum LRV capacity at OMFS should be able to reduce the land take, preserve more trees, reduce stream and wetland impact, and reduce impacts to neighboring residential uses.	As discussed in Section 2.1 of the Final EIS, Background and Project Development, Sound Transit 3 calls for a total fleet (existing plus new) of approximately 460 light rail vehicles (LRVs). To meet Sound Transit 3's system expansion goals, Sound Transit needs two additional operations and maintenance facilities: one in both the North and South Corridors. The proposed OMF South project will satisfy the need for an OMF in the South Corridor and LRV testing to support system expansion.
137	Why is preferred option most land intensive? 6 acres more than 344th St.	The acreage for each alternative is a function of the shape of the site and how efficiently the various OMF site components can fit within the site boundaries. As described in Final EIS Chapter 2, the Preferred Alternative is 66 acres, the South 344th Street Alternative is 64 acres, and the Midway Landfill Alternative is 68 acres.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
138	Although S 344th alternative has more facilities impacted, CFC is huge and this analysis does not access or account for the cumulative number of community members impacted.	The Final EIS discusses potential impacts to the Christian Faith Center in Section 3.3, Acquisitions, Displacements, and Relocations, and Section 3.6, Social Resources, Community Facilities, and Neighborhoods.
139	Provide methodology for calculating business displacement and provide list of those counted business. These number are under counting the true impacts	Please see the response to Comment ID 106.
140	Any changes to schedule beyond a standard 5 day, 8 hr daytime schedule will require approval by the City. Nighttime work may not be allowed due to proximity to residential properties.	Comment acknowledged.
141	[Section 3.2.1.4, in reference to "20th Avenue E"] S, not E	The error has been corrected in the Final EIS.
142	Routes 177 and 577 would still be faster than light rail for several years, so there will be opposition to discontinuing those routes.	Please see the response to Comment ID 8.
143	S 330th St is inappropriate for a haul route, as it is narrow, has a small traffic circle at 20th Ave S, and traverses residential areas with some areas of high parking utilization.	Please see the response to Comment ID 27.
144	S 330th St is not an acceptable haul route.	Please see the response to Comment ID 27.
145	[Chapter 4, Section 4.4.1] for construction. Design and R/W is funded.	Please see the response to Comment ID 135.
146	Intersections with a collision rate above 1.0 per MEV should be discussed in greater detail as to potential contributing factors. Additionally, the societal cost per MEV must be provided in the collision summary tables and discussed.	Please see the response to Comment IDs 4 and 5.
147	It is noted that the annual growth rate is based on the growth rate used for TDLE traffic studies, but please specify what the basis for the assumed TDLE annual growth rate was. Typically, a higher annual growth rate closer to 1.25 percent has been used in the City of Federal Way.	Please see the response to Comment ID 6.
148	Was this signal timing optimization vetted with WSDOT and/or City of Federal Way? Are there other external factors outside of the study area that would impact the ability to optimize the signal timings?	Please see the response to Comment ID 7.
149	A more comprehensive trip generation sections needs to be provided in this report. The appendices do not include detailed calculations and the methodology outlined here does not match with the methodology outlined in the appendices (i.e. trip generation does not appear to account for delivery-related trips or other non-employee trips)	Please see the response to Comment ID 9.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
150	Given that this is a long-range analysis, and that the evaluated alternatives result in major changes to the roadway network, it is not appropriate to base trip distribution assumptions on existing travel patterns along. Trip distribution patterns should be based on the regional travel model and adjusted as needed based on changes to the roadway network.	Please see the response to Comment ID 10.
151	It cannot be definitely stated that no new safety issues would be introduced and no existing safety issues would be exacerbated. Particularly given the elimination of north-south connectivity for non-motorized traffic in the South 344th Street Alternative.	Please see the response to Comment ID 11.
152	The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.	Please see the response to Comment ID 12.
153	This is not consistent with the provided site plan. The description and if applicable, the associated analysis should be updated.	Please see the response to Comment ID 50.
154	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
155	Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.	Please see the response to Comment ID 16.
156	Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-6. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.	Please see the response to Comment ID 17.
157	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
158	55 seconds of delay would typically indicate LOS E conditions. Without Synchro worksheets provided, it cannot be definitely confirmed that there are no impacts at this intersection. Please clarify.	Please see the response to Comment ID 19.
159	Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.	Please see the response to Comment ID 16.
160	Additional new intersections and site access points are not included in the analysis and are not summarized in Table 3.2-7. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.	Please see the response to Comment ID 17.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
161	This figure should indicate the new roadway extensions that are part of the preferred alternative. Additionally, new intersections and site driveways must be included in the analysis and shown on the figure.	Please see the response to Comment ID 22.
162	The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.	Please see the response to Comment ID 12.
163	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
164	If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.	Please see the response to Comment ID 25.
165	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
166	If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.	Please see the response to Comment ID 25.
167	This figure should indicate the new roadway extensions that are part of the preferred alternative. Additionally, new intersections and site driveways must be included in the analysis and shown on the figure.	Please see the response to Comment ID 22.
168	This would have a significant impact as a north-south bicycle connection would not be possible and the majority of injury-related crashes involved ped and cyclists along SR 99	Please see the response to Comment ID 26.
169	In addition to the impacts of truck activity, the impacts of trips related to workers traveling to and from the site should be quantified and discussed.	Please see the response to Comment ID 28.
170	Please clarify how many workers would be traveling to and from the site and if there would be sufficient parking on-site for all workers to park.	Please see the response to Comment ID 29.
171	Consistent with the executive summary, the City's street vacation process should be referenced as an ongoing coordination effort related to the reconfiguration of the street network.	Please see the response to Comment ID 12.
172	this last sentence seems out of context with the paragraph. What 1,000 SF building?	There would be a building associated with the test track. The previous sentence in Final EIS Section 2.2.8, Design Updates, mentions a test track facility separate from the OMF site. The description of the 1,000-square-foot building pertains to that facility.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
173	How can environmental impacts from TDLE be considered part of the "no-build" alternative if TDLE does not have an approved environmental document?	Please see the response to Comment ID 1.
174	should this 3-year time period be updated to more current?	Comment pertaining to traffic safety data. Please see response to Comment ID 3.
175	Parking study needs to be updated from the FWLE EIS to be consistent with ability to remove stalls without replacement. Does this include stalls removed for S324th culvert and roadway grade construction?	Please see the response to Comment ID 14.
176	these photos look the same	Please see the response to Comment ID 125.
177	cell tower removed?	Please see the response to Comment ID 126.
178	Were the maintenance activity and testing of horns noise generators analyzed? Is this like a automatic car wash... those dryers are loud. Seems to only be analysis of train movement (squeal). Mitigation?	Please see the response to Comment ID 127.
179	this should be a MUST vs. may replace the culvert.	Please see the response to Comment ID 129.
180	18th PI S should not be "blamed" for wetland impacts. The project needs site can be modified/reduced to NOT require impacts to the wetland west of the preferred site.	Please see the response to Comment ID 130.
181	<i>[comment to delete the word "may" in reference to replacing the culvert]</i>	Please see the response to Comment ID 129.
182	site design needs to eliminate wetland impacts related to 18th PI S; need to avoid encroachment	Please see the response to Comment ID 130.
183	Apparent unaccounted for impact from the Preferred Alternative to the parking/loading in the northeast corner of the Spectrum Business Park. The EIS should determine if the required parking for the uses at the Spectrum Business Park will be impacted, reduced, or result in any non-conformance.	Please see the response to Comment ID 105.
184	How was this calculated? What are the exact businesses that are being displaced? Is there a spreadsheet of this information? According to Washington State Department of Revenue there are way more 6 active business licenses that will be impacted. This also applies to the South 344th Street Alternative	Please see the response to Comment ID 106.
185	Provide methodology for how the number of employees impacted was calculated. I am concerned these numbers do not accurately reflect the true number of active businesses that may be impacted and undercount the actual number of impacted employees.	Please see the response to Comment ID 107.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
186	Provide more information regarding how this conclusion was arrived to. Are there no sensitive receptors?	Table ES-1, Key Characteristics and Impacts of the Build Alternatives in the Executive Summary is a summary of the EIS analysis. Section 3.9, Noise and Vibration, of the Final EIS and Appendix G2, Noise and Vibration Technical Report, include the requested information.
187	Belmor is a manufactured home community, zoned multifamily residential.	Please see the response to Comment ID 98.
188	This is 14, what is the remaining 1 unit? Provide methodology for calculating impacted residents and provide addresses.	Section 3.6.2 of the Final EIS has been revised to say, "The OMF site would also displace 15 residences, composed of one four-unit multi-family residential property and 10 single-family residential properties, one of which has two separate houses."
189	What analysis went in to this conclusion? Airtime Aviation, Inc. is located in a custom designed building for the use. The impact to this business and others like it is inadequately evaluated.	Please see the response to Comment ID 100.
190	County of origin, immigration status should also be considered.	Please see the response to Comment ID 101.
191	There is already a lot of asphalt and concrete between the I5 and Pac Hwy corridor in Federal Way, Removing trees within this area will have an increasingly negative impact on the City's urban heat index and citywide tree canopy coverage. Impacts to the urban heat index and the citywide tree canopy coverage should be evaluated between alternatives.	Please see the response to Comment ID 123.
192	Image shows redirected power lines. Confirm if this was intentional? Will they be redirected?	Please see the response to Comment ID 124.
193	The evaluation of noise impact should measure and account for any increase in ambient I5 noise caused from tree removal and sound barrier as part of the track construction.	Please see the response to Comment ID 128.
194	There is a large tree canopy with mature trees that will be heavily impacted by the proposed 18th Place S Extension as part of the Preferred alternative. Currently as proposed neither OMF sites in Federal Way will meet Tree Retention requirements	Please see the response to Comment ID 132.
195	Please clarify the basis for this standard as it is not specified in Attachment A.	Please see the response to Comment ID 49.
196	Please clarify the basis for this standard as it is not specified in Attachment A. Additionally, the City of Federal Way standards should be referenced here since they are based on v/c rather than LOS/delay.	Please see the response to Comment ID 49.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
197	<p>Overall Comments:</p> <ul style="list-style-type: none"> The analysis provided does not adequately analyze the preferred and 344th Street alternatives as not all new driveways/intersections are included and/or incorrect driveways are included. Additionally, v/c must be recorded for all intersections including those along State Routes as the City of Federal Way controls these intersections. There is insufficient information provided related to the existing land uses removed and traffic rerouted as a result of vacated streets. Supplemental trip generation analysis and volume figures should be provided to illustrate how these conditions impact the future volumes. Without this information it is not possible to validate the future volumes provided. Additional attachments must be provided including detailed trip generation information for the OMF South site and existing land uses; traffic counts; and Synchro worksheets. 	Please see the response to Comment ID 48.
198	The extension of 18th Place S is described as intersection S 336th Street as the fourth (NB) leg of the 18th Ave S/S 336th St intersection, but the conceptual site plan does not depict it in this way due to the creek. It is assumed that a four-leg intersection is not feasible here and therefore the description/analysis should be revised accordingly.	Please see the response to Comment ID 50.
199	Please clarify what "as applicable" means. For instance, was volume balancing between intersections a key factor?	Please see the response to Comment ID 51.
200	During the AM peak hour, existing volumes at intersections 6 and 9 have decreased as compared to the 2021 DEIS resulting in greater volume imbalances between intersections in some cases. Please explain the change from the 2021 DEIS to the 2023 ADEIS.	Please see the response to Comment ID 52.
201	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
202	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
203	While it is acceptable to use collision data from 2016 to 2018 because collision data during the pandemic was atypical, many studies have found that collision rates were higher during the pandemic. Therefore it may not be accurate to say that 2016 to 2018 collision data is more conservative.	Please see the response to Comment ID 54.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
204	Intersections with a collision rate above 1.0 per MEV should be discussed in greater detail as to potential contributing factors. Additionally, the societal cost per MEV must be provided in the collision summary tables and discussed.	Please see the response to Comment ID 4 and 5.
205	It is noted that the annual growth rate is based on the growth rate used for TDLE traffic studies, but please specify what the basis for the assumed TDLE annual growth rate was. Typically, a higher annual growth rate closer to 1.25 percent has been used in the City of Federal Way.	Please see the response to Comment ID 6.
206	Was this signal timing optimization vetted with WSDOT and/or City of Federal Way? Are there other external factors outside of the study area that would impact the ability to optimize the signal timings?	Please see the response to Comment ID 7.
207	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
208	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
209	Given that this is a long-range analysis, and that the evaluated alternatives result in major changes to the roadway network, it is not appropriate to base trip distribution assumptions on existing travel patterns along. Trip distribution patterns should be based on the regional travel model and adjusted as needed based on changes to the roadway network.	Please see the response to Comment ID 10.
210	A more comprehensive trip generation sections needs to be provided in this report. The appendices do not include detailed calculations and the methodology outlined here does not match with the methodology outlined in the appendices (i.e. trip generation does not appear to account for delivery-related trips or other non-employee trips)	Please see the response to Comment ID 9.
211	Please specify the approximate number of parking spaces this represents for each alternative.	Please see the response to Comment ID 60.
212	This section should address the intersections with a collision rate over 1.0 collisions per MEV and discuss how the project may impact these locations. Additionally, if north-south non-motorized facilities would not be feasible as part of the 344th Street Alternative, safety would not improve for non-motorized users and could in fact worsen. Please elaborate.	Please see the response to Comment ID 61.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
213	Information regarding existing land uses to be removed and associated trip generation projections for those uses need to be provided in this section.	Please see the response to Comment ID 64.
214	This is not consistent with the provided site plan. The description and if applicable, the associated analysis should be updated.	Please see the response to Comment ID 50.
215	The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.	Please see the response to Comment ID 12.
216	In addition to trip assignment, trip distribution figures should be included. Alternatively, trip distribution percentages could be illustrated on this figure (Figure G1.4-7)	Please see the response to Comment ID 65.
217	This figure should indicate new roadway extensions that are part of the preferred alternative.	Please see the response to Comment ID 66.
218	<p>This figure shows intersection 10 as a new intersection, but intersection 10 no longer exists as part of the preferred alternative site plan based on Figure G1.1-2 and the roadway network description. If this driveway no longer exists, the volumes going through this intersection would need to be routed to other site access points and other study area intersections.</p> <p>Additionally, this figure does not show intersection 11 (18th Place S Extension/S 336th Street), but intersection is included in the LOS tables. Finally, the intersections of 21st Avenue S/S 341st Place and 21st Avenue S Extension/S 344th Street should be included in the analysis as well as future volume figures.</p> <p>Overall, the analysis provided does not sufficiently analyze the operational impacts of the preferred alternative.</p>	Please see the response to Comment IDs 67, 68, and 69.
219	This figure should indicate new roadway extensions that are part of the preferred alternative.	Please see the response to Comment ID 69.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
220	<p>This figure shows intersection 10 as a new intersection, but intersection 10 no longer exists as part of the preferred alternative site plan based on Figure G1.1-2 and the roadway network description. If this driveway no longer exists, the volumes going through this intersection would need to be routed to other site access points and other study area intersections.</p> <p>Additionally, this figure does not show intersection 11 (18th Place S Extension/S 336th Street), but intersection is included in the LOS tables. Finally, the intersections of 21st Avenue S/S 341st Place and 21st Avenue S Extension/S 344th Street should be included in the analysis as well as future volume figures.</p> <p>It is also not clear how the rerouted vehicles from roadway closures are accounted for. For example, the no-build conditions show 85 vehicles exiting 20th Avenue S during the PM peak hour. However, there are only 15 additional right turns at intersection 1 and no additional left turns beyond project trips. While volumes for intersection 11 are not shown, based on the future volumes at intersection 1, it does not appear that additional trips are routed to intersection 11. If these trips would no longer exist due to land uses being removed, it is not clear from this analysis as no trip generation for existing land uses to be removed is provided. A figure showing how existing traffic was removed and rerouted should be included.</p> <p>Overall, the analysis provided does not sufficiently analyze the operational impacts of the preferred alternative.</p>	Please see the response to Comment IDs 70, 71, 72, and 73.
221	Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.	Please see the response to Comment ID 74.
222	Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.	Please see the response to Comment ID 76.
223	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
224	<p>This figure should indicate the new roadway extensions that are part of the preferred alternative.</p> <p>Additionally, new intersections and site driveways must be shown on the figure.</p>	Please see the response to Comment ID 77.
225	55 seconds of delay would typically indicate LOS E conditions. Without Synchro worksheets provided, it cannot be definitely confirmed that there are no impacts at this intersection. Please clarify.	Please see the response to Comment ID 19.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
226	Intersection 10 (SR 99/Driveway) is longer proposed as part of the preferred alternative.	Please see the response to Comment ID 16.
227	Additional new intersections and site access points are not included in the analysis and are not summarized in Table G1.4-10. All new site driveways and new intersections resulting from roadway extensions must be provided in this table.	Please see the response to Comment ID 17.
228	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
229	This figure should indicate the new roadway extensions that are part of the preferred alternative. Additionally, new intersections and site driveways must be shown on the figure.	Please see the response to Comment ID 77.
230	It should be more clearly defined where and what bicycle and pedestrian improvements are proposed as part of the preferred alternative.	Please see the response to Comment ID 82.
231	The safety section should address if the project would impact intersections that already have a crash rate greater than 1.0 collisions per MEV.	Please see the response to Comment ID 61.
232	Information regarding existing land uses to be removed and associated trip generation projections for those uses need to be provided in this section.	Please see the response to Comment ID 64.
233	The City of Federal Way's street vacation process should be referenced as it relates to the currently proposed roadway network and potential ongoing coordination.	Please see the response to Comment ID 12.
234	In addition to trip assignment, trip distribution figures should be included. Alternatively, trip distribution percentages could be illustrated on this figure (Figure G1.4-11)	Please see the response to Comment ID 85.
235	Intersection 10 is mislabeled for both AM and PM peak hours	Please see the response to Comment ID 86.
236	If Intersection 1 is only providing access to the Christian Faith Church under build conditions, and little to no project trips are projected it is unlikely that this intersection would observe as much traffic as it does today. This analysis does not sufficiently account for (or sufficiently document) traffic that would be rerouted from 20th Avenue S due to the closure. As such, this analysis may not adequately take into account additional impacts along SR 99 or 16th Street as a result. More broadly, a figure showing how existing traffic was removed and rerouted should be included.	Please see the response to Comment ID 87.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
237	If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table.	Please see the response to Comment ID 88.
238	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
239	If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown on this figure (Figure G1.4-13)	Please see the response to Comment ID 90.
240	If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown in this table	Please see the response to Comment ID 88.
241	v/c must be recorded for all intersections, including those along State Routes. City of Federal Way is in control of these intersections and therefore the v/c standard applies to them.	Please see the response to Comment ID 15.
242	If volume projections are included for intersection 10 (as shown on the previous figures), then the traffic operations results should be shown on this figure (Figure G1.4-14)	Please see the response to Comment ID 91.
243	This would have a significant impact as a north-south bicycle connection would not be possible and the majority of injury-related crashes involved pedestrians and cyclists along SR 99.	Please see responses to Comment IDs 26.
244	The safety section should address if the project would impact intersections that already have a crash rate greater than 1.0 collisions per MEV. Additionally, this section should address non-motorized safety impacts associated with eliminating a north-south non motorized connection.	Please see the response to Comment ID 61.
245	In addition to the impacts of truck activity, the impacts of trips related to workers traveling to and from the site should be quantified and discussed.	Please see the response to Comment ID 28.
246	Please clarify how long north-south connectivity would be impacted as pedestrians and cyclists would shift to SR 99 under this scenario.	Please see the response to Comment ID 95.
247	Please clarify how many workers would be traveling to and from the site and if there would be sufficient parking on-site for all workers to park.	Please see the response to Comment ID 29.
248	Consistent with the executive summary, the City's street vacation process should be referenced as an ongoing coordination effort related to the reconfiguration of the street network.	Please see the response to Comment ID 12.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
249	-an updated parking analysis for the WSDOT 320th/23rd Ave park and ride needs to be completed to support removal of parking spaces consistent with the FWLE EIS that assumed use of this park and ride for LINK/Regional Transit riders.	Please see the response to Comment ID 14.
250	cannot look at one SR99 intersection in a vacuum as the entire corridor is coordinated.	Please see the response to Comment ID 7.
251	Inaccurate and should be updated.	Please see the response to Comment ID 113.
252	Not accurate and should be updated	Please see the response to Comment ID 113.
253	Inaccurate, needs to be updated.	Please see the response to Comment ID 115.
254	Strike out of the word "street"	Appendix H2, Land Use Technical Appendix, to the Final EIS was revised to reflect this comment.
255	site Replacing where strikeout in previous comment was.	Please see the response to Comment ID 254.
256	The OMF site alternatives are not within the City Center	Please see the response to Comment ID 114.
257	this is outdated. Not mentioned here is the South Station Subarea Plan and the Countywide Growth Center Candidate Designation	Please see the response to Comment ID 115.
258	Provide basis for calculation of 17 acres in the CC-C zone due to OMF impacts.	Please see the response to Comment ID 116.
259	Portion is not accurate considering the Preferred Alternative is a majority zoned multifamily residential.	Please see the response to Comment ID 117.
260	Considering the OMF a "Government facility" is not accurate. This statement is incorrect. Light rail or commuter rail transit facility require a Process IV review in the CC-C & CE zones	Please see the response to Comment ID 117.
261	Not appropriate to consider the OMF use as a Government Facility.	Please see the response to Comment ID 118.
262	Considering the OMF a "Government facility" is not accurate.	Please see the response to Comment ID 118.
263	Incorrect, the permitting use for the OMFS would be Public Transportation Facilities, per FWRC 19.240.135.	Please see the response to Comment ID 118.
264	Misleading and inaccurate statement. The light rail stations support light rail operations. Having the OMF site in the City of Federal Way does not support mixed-use development anymore than the OMF site being located at Midway Landfill does.	Please see the response to Comment ID 119.
265	The mitigation steps should not only be used to support aesthetic compatibility between uses, and should extend to include additional impacts like noise/sound, light, vibration, etc.	Please see the response to Comment ID 120.

City of Federal Way (Communication ID 539072)		
Comment ID	Comment Text	Response
266	Misleading and inaccurate statement. The light rail stations support light rail operations. Having the OMF site in the City of Federal Way does not help broaden transit options for MF in the Federal Way area than the OMF site being located at Midway Landfill does.	Please see the response to Comment ID 119.
267	Response provided for Policy LU40 is inappropriate. The policy is about the range of retail and supportive uses.	Please see the response to Comment ID 122.

Public Commenters

In the interest of privacy, personal phone numbers and email addresses have been redacted.

Barry Turnbull

[REDACTED]

right across the street from Casey Treats building and I'm affected by the new ruling that you're going to make and I'm in favor of the South 344th Street Alternative and the reason why is the the preferred alternative is kinda crowded in to one different area but the 344th goes down the freeway and it has more towards the freeway whereas the other one is all on the land. It's crowded in there it's spread out on 344thth. I'm sorry if I got you confused but 344th is the one I wanna go for. Thank you very much. I left my address and let me know. Thank you. Bye bye."

Barry Turnbull (Communications ID 537037)		
Comment ID	Comment Text	Response
1	I live right across the street from Casey Treats building and I'm affected by the new ruling that you're going to make and I'm in favor of the South 344th Street Alternative and the reason why is the preferred alternative is kinda crowded in to one different area but the 344th goes down the freeway and it has more towards the freeway whereas the other one is all on the land. It's crowded in there it's spread out on 344thth. I'm sorry if I got you confused but 344th is the one I wanna go for.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Wrong streets listed?

Glenn Sawyer [REDACTED]

Wed 9/27/2023 12:25 PM

To:OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

On your website for the south operational proposals, you list 18th Avenue Southwest. It is nowhere near this project. It should say 18th Avenue South.

Glenn Sawyer (Communications ID 537189)		
Comment ID	Comment Text	Response
1	On your website for the south operational proposals, you list 18th Avenue Southwest. It is nowhere near this project. It should say 18th Avenue South.	Thank you for your comment; this was corrected to 18th Place South on the website.

Communication ID: 537204

OMF South NEPA DEIS OOH Comment 1

09/22/2023

To put it simply, the preferred alternative is the only way to go here. The sight should be selected and it should get up and running as soon as possible to support Link operations.

Anonymous/OOH (Communications ID 537204)		
Comment ID	Comment Text	Response
1	To put it simply, the preferred alternative is the only way to go here. The sight should be selected and it should get up and running as soon as possible to support Link operations.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 537207

OMF South NEPA DEIS OOH Comment 2

09/22/2023

The shrub scrub wetlands and forested wetland to the west of the new proposed road in the preferred alternative really should be maintained and improved as mitigation for the projects rather than turned to landscaping and buying into a mitigation bank elsewhere or attempting mitigation elsewhere. Impacts to the hylebos watersheds should also be mitigated within the watershed to improve water storage and fish passage especially since this project has so many impacts within the watershed. Additional flood storage should be planned for for the likely beaver deconfliction that will arise in the future along that section of the stream in the project site as well. Since this project has also disproportionately impacted so many low income and protected people in the South sound particularly compared to the north and east extensions, special consideration should be given to the people sound transit continues to displace from their homes and value assessments from 3rd party assessors should be made more accessible as should the process to counter the valuations provided by sound transits assessors. Furthermore, in the interest of sound transit being better stewards of tax payer funds, additional consideration to staying within budget, and measures for staying within budget when unforeseen project challenges arise should be implemented into the project contracts.

Anonymous/OOH (Communications ID 537207)		
Comment ID	Comment Text	Response
1	The shrub scrub wetlands and forested wetland to the west of the new proposed road in the preferred alternative really should be maintained and improved as mitigation for the projects rather than turned to landscaping and buying into a mitigation bank elsewhere or attempting mitigation elsewhere. Impacts to the Hylebos watershed should also be mitigated within the watershed to improve water storage and fish passage especially since this project has so many impacts within the watershed. Additional flood storage should be planned for for the likely beaver deconfliction that will arise in the future along that section of the stream in the project site as well.	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	Since this project has also disproportionately impacted so many low income and protected people in the South sound particularly compared to the north and east extensions, special consideration should be given to the people sound transit continues to displace from their homes and value assessments from 3rd party assessors should be made more accessible as should the process to counter the valuations provided by sound transits assessors.	Please see the response to Common Comment 2 in Table L.1-1, Responses to Common Comments, in the Final EIS.
3	Furthermore, in the interest of sound transit being better stewards of tax payer funds, additional consideration to staying within budget, and measures for staying within budget when unforeseen project challenges arise should be implemented into the project contracts.	Sound Transit will implement measures to control costs and manage the budget throughout the design and construction phases of the project. These include risk assessments, value management reviews, and value engineering evaluations and conditions in the contract for contract amendments, change orders, and unforeseen circumstances.

Communication ID: 537209

OMF South NEPA DEIS OOH Comment 3

09/22/2023

Jacob Davidson

Hi. I live at 1830 S. 336th St in federal way. I'm Really concerned about this project effecting traffic and and damage to our natural areas. We have creeks and West lands. I'm also concerned that the noise from the facility will be horrible and affect my quality of life. The traffic and dust from semi is also a concern. It seems mid way would be the best option as it affects the least amount of people. I'm concerned my property value will go down, I won't be able to sell if i wanted. What will sound transit to to mitigate the affects of our property. The noise during construction and after, traffic property values. I'm very concerned that the facility will be noise 24 7 and have a negative affect on our quality of life. I would ask for more trees to be planted around facility and along 336th as well as requesting a noise study. Being we would be directly across for the facility we may need to upgrade our windows and insulation to ensure our homes are unchanged as far ad noise. .

Jacob Davidson (Communications ID 537209)		
Comment ID	Comment Text	Response
1	I live at 1830 S. 336th St in federal way. I'm Really concerned about this project effecting traffic and damage to our natural areas. We have creeks and West lands.	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, and Section 3.10, Ecosystems, of the Final EIS for more detail about impacts and mitigation measures concerning natural resources. Please see Section 3.2, Transportation, for more detail about anticipated impacts and mitigation measures concerning traffic.
2	I'm also concerned that the noise from the facility will be horrible and affect my quality of life.	Please see response to Comment ID 5 below.
3	The traffic and dust from semi is also a concern.	Potential construction impacts are addressed in Section 3.2, Transportation, and Section 3.8, Air Quality, in the Final EIS. The contractor would be required to use project controls and best management practices to reduce impacts to air quality, including dust.
4	It seems mid way would be the best option as it affects the least amount of people.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
5	I'm very concerned that the facility will be noise 24 7 and have a negative affect on our quality of life. I would ask for more trees to be planted around facility and along 336th as well as requesting a noise study. Being we would be directly across for the facility we may need to upgrade our windows and insulation to ensure our homes are unchanged as far ad noise.	As part of the EIS, Sound Transit conducted a noise and vibration analysis. The findings of the analysis are summarized in Section 3.9, Noise and Vibration, of the Final EIS and described in more detail in Appendix G2, Noise and Vibration Technical Report. Based on the current design, the OMF South facility for all the alternatives would not have noise impacts to nearby sensitive receptors. Noise impacts from the mainline guideway would be mitigated following Sound Transit's Link Light Rail Noise and Vibration Policy. Section 3.7, Visual and Aesthetic Resources, includes simulations that show the proposed landscaping for the site, which includes a large number of trees and other vegetation to help screen the facility from view.

Communication ID: 537210

OMF South NEPA DEIS OOH Comment 4

09/23/2023

Please put the OMF on the Midway landfill site. This is exactly the type of government project that is worth spending the additional time and dollars for. Look at how many business, residences are not displaced, and how many streams and wetlands are not impacted. This site would probably never be used for private business and will remain under utilized and an eyesore for decades to come. The alternative sites could make a bigger impact to mass transit by being rezoned for MFH, with quick access to mass transit/light rail access. Thank you.

Anonymous/OOH (Communications ID 537210)		
Comment ID	Comment Text	Response
1	Please put the OMF on the Midway landfill site. This is exactly the type of government project that is worth spending the additional time and dollars for. Look at how many business, residences are not displaced, and how many streams and wetlands are not impacted. This site would probably never be used for private business and will remain under utilized and an eyesore for decades to come.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	The alternative sites could make a bigger impact to mass transit by being rezoned for MFH, with quick access to mass transit/light rail access.	The OMF is a maintenance facility and would not provide any public access to the Link light rail system. Zoning and comprehensive plan designations are discussed in Section 3.3, Land Use, of the Final EIS. Note that Sound Transit does not have jurisdiction over local agency zoning.

Communication ID: 537211

OMF South NEPA DEIS OOH Comment 5

09/23/2023

Please reconsider the Midway site for your primary site. The environmental, residential, and business impact is minimal compared to the other sites. This is how we want government to spend funds, utilizing sites that the public sector won't. Who is going to buy that eyesore? You don't have to tear down any trees or take away any wetlands. I know there is other considerations but I really think it is a better utilization of space for both communities

Anonymous/OOH (Communication ID 537211)		
Comment ID	Comment Text	Response
1	Please reconsider the Midway site for your primary site. The environmental, residential, and business impact is minimal compared to the other sites. This is how we want government to spend funds, utilizing sites that the public sector won't. Who is going to buy that eyesore? You don't have to tear down any trees or take away any wetlands. I know there is other considerations but I really think it is a better utilization of space for both communities	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 537212

OMF South NEPA DEIS OOH Comment 6

09/26/2023

Eric Johnson, Eric Johnson

Amphibian populations are declining worldwide, and amphibians are experiencing high extinction rates due to habitat loss, chytrid fungus, pollutants, pesticides, and climate change. Amphibians are the most threatened class of vertebrates and merit special attention in the Sound Transit Operations and Maintenance Facility South Project Environmental Impact Statement (EIS). The EIS should identify amphibian habitat and potential impacts to amphibians. Where possible, the project should minimize impacts to wetland, stream, and forest habitats. The project's proposed detention and treatment of stormwater runoff appears to be a good practice to protect water quality and reduce impacts to amphibians. References: Catenazzi, A. 2015. State of the World's Amphibians. *Annual Review of Environment and Resources*, 40, 911-119. Collins, J.P., and M.L. Crump. 2009. Extinction in Our Times: Global Amphibian Decline. New York, NY: Oxford University Press. Kolbert, E. 2014. *The Sixth Extinction, an Unnatural History*, Chapter 1. New York, NY: Bloomsbury. McCallum, M.L. 2007. Amphibian Decline or Extinction? Current Declines Dwarf Background Extinction Rate. *Journal of Herpetology*, Volume 41, Number 3, pp. 483-491.

Eric Johnson (Communication ID 537212)		
Comment ID	Comment Text	Response
1	<p>Amphibian populations are declining worldwide, and amphibians are experiencing high extinction rates due to habitat loss, chytrid fungus, pollutants, pesticides, and climate change. Amphibians are the most threatened class of vertebrates and merit special attention in the Sound Transit Operations and Maintenance Facility South Project Environmental Impact Statement (EIS). The EIS should identify amphibian habitat and potential impacts to amphibians. Where possible, the project should minimize impacts to wetland, stream, and forest habitats. The project's proposed detention and treatment of stormwater runoff appears to be a good practice to protect water quality and reduce impacts to amphibians. References: Catenazzi, A. 2015. State of the World's Amphibians. Annual Review of Environment and Resources, 40, 911-119 Collins, J.P., and M.L. Crump. 2009. Extinction in Our Times: Global Amphibian Decline. New York, NY: Oxford University Press. Kolbert, E. 2014. The Sixth Extinction, an Unnatural History, Chapter 1. New York, NY: Bloomsbury. McCallum, M.L. 2007. Amphibian Decline or Extinction? Current Declines Dwarf Background Extinction Rate. Journal of Herpetology, Volume 41, Number 3, pp. 483-491.</p>	<p>The environmental analysis in the Final EIS considers potential impacts to amphibians. Please see Section 3.10, Ecosystem Resources, and Appendix G3, Ecosystems Resources Technical Report, for more detail. There are no recent reports of the Western toad, a species of concern, near the study area. Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS for information on minimizing impacts to wetland, stream, and forest habitats.</p>

Communication ID: 537213

OMF South NEPA DEIS OOH Comment 7

09/26/2023

Sue Cornell

Vote for preferred alternative at 336th St.

Sue Cornell (Communication ID 537213)		
Comment ID	Comment Text	Response
1	Vote for preferred alternative at 336th St.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 537214

OMF South NEPA DEIS OOH Comment 8

09/27/2023

Glenn Sawyer

I would prefer the "Preferred Alternative" site. The city of Federal Way has already lost 53 acres of property tax revenue from the Christian Faith Center. Please do not chose the South 344th Alternative since it will take additional property tax revenue and take jobs and businesses away.

Glenn Sawyer (Communication ID 537214)		
Comment ID	Comment Text	Response
1	I would prefer the "Preferred Alternative" site. The city of Federal Way has already lost 53 acres of property tax revenue from the Christian Faith Center.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	Please do not chose the South 344th Alternative since it will take additional property tax revenue and take jobs and businesses away.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 537215

OMF South NEPA DEIS OOH Comment 9

09/27/2023

The City of Federal Way Public Works Department often creates roadblocks to allowing projects within the City to complete quickly and efficiently which results in increased impacts to the traveling public and also increased environmental impacts due to longer project durations. These additional City requirements also result in added costs to taxpayers. What is ST doing to preemptively avoid this as part of the EIS and pre-project planning?

Anonymous/OOH (Communications ID 537215)		
Comment ID	Comment Text	Response
1	The City of Federal Way Public Works Department often creates roadblocks to allowing projects within the City to complete quickly and efficiently which results in increased impacts to the traveling public and also increased environmental impacts due to longer project durations. These additional City requirements also result in added costs to taxpayers. What is ST doing to preemptively avoid this as part of the EIS and pre-project planning?	Sound Transit has been closely coordinating with Federal Way on the preliminary design of the Preferred Alternative and will continue to do so if it or the South 344th Street Alternative are selected as the project to be built.

Communication ID: 537217

OMF South NEPA DEIS OOH Comment 10

09/27/2023

Dusty Wilson

I recognize that the Christian Faith Center site is preferred for a variety of good reasons ... not the least of which is cost. But I drive/walk by the abandoned Midway Landfill nearly every day and it is hard not to want to see it put to use. I think that is why you can't escape it remaining on the list. So, I have a suggestion. Instead of pouring over a billion dollars into that site, why don't you find a way to spend a million and turn it into a simple public park. Maybe there is an easy way to make it a useful space which would change it's image from "abandoned and vacant lot" to "community asset." Our community benefits and you save millions of dollars and get to move on from this issue.

Dusty Wilson (Communications ID 537217)		
Comment ID	Comment Text	Response
1	I recognize that the Christian Faith Center site is preferred for a variety of good reasons... not the least of which is cost. But I drive/walk by the abandoned Midway Landfill nearly every day and it is hard not to want to see it put to use. I think that is why you can't escape it remaining on the list. So, I have a suggestion. Instead of pouring over a billion dollars into that site, why don't you find a way to spend a million and turn it into a simple public park. Maybe there is an easy way to make it a useful space which would change it's image from "abandoned and vacant lot" to "community asset." Our community benefits and you save millions of dollars and get to move on from this issue.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 537218

OMF South NEPA DEIS OOH Comment 11

10/01/2023

Kay Vallejo

Midway landfill would be the smartest site, with less disruption of people and business. It is important to respect the citizens of the community you will disturb. Federal Way, is a large community of older residence, and the light rail will be a huge disruption enough, without a repair facility, too. Midway Landfill would be best! Thank You!

Kay Vallejo (Communications ID 537218)		
Comment ID	Comment Text	Response
1	Midway landfill would be the smartest site, with less disruption of people and business. It is important to respect the citizens of the community you will disturb. Federal Way, is a large community of older residence, and the light rail will be a huge disruption enough, without a repair facility, too. Midway Landfill would be best!	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 537672

OMF South NEPA DEIS OOH Comment 12

10/02/2023

Eduardo Munoz

Regardless of location i do agree on the preferred location! And Conection to pac highway..

Eduardo Munoz (Communications ID 537672)		
Comment ID	Comment Text	Response
1	Regardless of location i do agree on the preferred location! And Conection to pac highway.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 537673

OMF South NEPA DEIS OOH Comment 13

10/04/2023

Rick Barnett

I believe the preferred site is still be far the best choice. The property configuration, location and development options are the best. In addition, the current uses in that selection could have a much better chance to relocate in close proximity to existing locations. Overall less impact on business, homes and community. Thank You,

Rick Barnett (Communications ID 537673)		
Comment ID	Comment Text	Response
1	I believe the preferred site is still by far the best choice. The property configuration, location and development options are the best. In addition, the current uses in that selection could have a much better chance to relocate in close proximity to existing locations. Overall less impact on business, homes and community.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

NOT on the Midway Landfill

Fran Je [REDACTED]

Sun 10/8/2023 7:10 PM

To:OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

You don't often get email from memoimwen@gmail.com. [Learn why this is important](#)

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the “fish” button in Outlook. Thank you! ST Information Security

To whom it may concern,

I live in the Federal Way High School neighborhood and I want to remind you that it would be hazardous to build on the Midway Landfill. Wherever you choose to build, DO NOT BUILD ON THE MIDWAY LANDFILL!

Sincerely,

Francois J. Ryf

Francois Ryf (Communication ID 537687)		
Comment ID	Comment Text	Response
1	I live in the Federal Way High School neighborhood and I want to remind you that it would be hazardous to build on the Midway Landfill. Wherever you choose to build, DO NOT BUILD ON THE MIDWAY LANDFILL!	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Leota Miller

[REDACTED]

comment regarding the facility for the Link around 336th. I'm just in Federal way now since 1973 so it's been 50 years and I really feel like this spot down here would not be a good spot because Federal Way has not become a wonderful city because of all the homelessness and I feel like this facility would make it actually a worse city and we don't need any more noise or any more industry, large industry things down here in the city. I believe up in Des Moines would be a better

[REDACTED]

citizen down here in Federal Way for 50 years. I'm 78 years old, raise my children here and I feel like it would hinder the city. Thank you and goodbye."

Leotta Miller (Communications ID 537872)		
Comment ID	Comment Text	Response
1	The facility for the Link around 336th. I'm just in Federal way now since 1973 so it's been 50 years and I really feel like this spot down here would not be a good spot because Federal Way has not become a wonderful city because of all the homelessness and I feel like this facility would make it actually a worse city and we don't need any more noise or any more industry, large industry things down here in the city.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	I believe up in Des Moines would be a better site	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 538026

OMF South NEPA DEIS OOH Comment 13

10/14/2023

Karl Hallesy

Best location for this is where you now have it. It is going to affect the least amount of people. Just get the review process done as inexpensive as possible because its going to happen just so much red tape increases the costs which increase our taxes.

Karl Hallesy (Communications ID 538026)		
Comment ID	Comment Text	Response
1	Best location for this is where you now have it. It is going to affect the least amount of people. Just get the review process done as inexpensive as possible because its going to happen just so much red tape increases the costs which increase our taxes.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

proposed light rail maintenance facility

Patricia Clayton [REDACTED]

Mon 10/16/2023 5:40 PM

To:OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the “fish” button in Outlook. Thank you! ST Information Security

I suggest the preferred alternative in brochure or the south 344thNOT the Midway Landfill. Thank you.

Patricia Clayton (Communications ID 538156)		
Comment ID	Comment Text	Response
1	I suggest the preferred alternative in brochure or the south 344th	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	NOT the Midway Landfill	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 538473

OMF South NEPA DEIS OOH Comment 14

10/16/2023

The Midway landfill location is best because it will be improving land that has been damaged. Both sites further south would have significant impact to habitat, wildlife and mature trees and forests. Please help preserve our great Evergreen State!

Anonymous/OOH (Communications ID 538473)		
Comment ID	Comment Text	Response
1	The Midway landfill location is best because it will be improving land that has been damaged. Both sites further south would have significant impact to habitat, wildlife and mature trees and forests. Please help preserve our great Evergreen State!	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Bill Pugnetti

“Following the presentation today, I see the comment on impacts on businesses and residences and persons of different backgrounds, and it appears that the non minority person carries more weight than the majority person. Excuse me. It appears that the minority person carries more weight in considerations than a majority person. That seems like a level of discrimination and unbalanced consideration between the parties, so I'd like to call you out on that matter. That's an unbalanced approach. It's not individual by individual, but it's racial or other grounds that some persons are worth more than others in considering the handling of the project, so I see an unbalanced approach and a level of discrimination there. Thank you.”

Bill Pugnetti (Communications ID 538475 and 538479)		
Comment ID	Comment Text	Response
1	Stepping back from any one of the three OMFS alternatives and considering them overall. It appears the driving force behind building any one of them is support of operations from Federal Way on south. Which is predominately Pierce County. Given that Pierce County residents voted 'NO' on ST3, by what authority Legal - Constitutional (United States and Washington) - Moral - other is Sound Transit able to disregard the vote of Pierce County residents ?	OMF South would service the overall Sound Transit 3 system expansion in Pierce, Snohomish, and King counties. Sound Transit 3 was a regional measure that voters approved funding for in 2016.
2	Following the presentation today, I see the comment on impacts on businesses and residences and persons of different backgrounds, and it appears that the non minority person carries more weight than the majority person. Excuse me. It appears that the minority person carries more weight in considerations than a majority person. That seems like a level of discrimination and unbalanced consideration between the parties, so I'd like to call you out on that matter. That's an unbalanced approach. It's not individual by individual, but it's racial or other grounds that some persons are worth more than others in considering the handling of the project, so I see an unbalanced approach and a level of discrimination there.	Under federal and state environmental laws, agencies such as FTA and Sound Transit are required to identify disproportionate and adverse human health or environmental effects of programs, policies, and activities on minority and low-income populations and how those effects would be mitigated.

Patricia Pugnetti

"This is Patricia Pugnetti. In previous discussions on this subject, I, well, I'm wondering. You did not state how many people would be put out of jobs that were in existing companies that were in the 324th area like Garage Town, and there's small electronic companies there. Could you fill me in on that, please?"

Patricia Pugnetti (Communications ID 538480)		
Comment ID	Comment Text	Response
1	You did not state how many people would be put out of jobs that were in existing companies that were in the 324th area like Garage Town, and there's small electronic companies there. Could you fill me in on that, please?	Potential employment impacts are addressed in Final EIS Section 3.5, Economics. Please also see response to Common Comment 1 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Operations & Maintenance & Facility location

Susan Strong [REDACTED]

Sun 11/5/2023 8:01 PM

To:OMF South <OMFsouth@soundtransit.org>

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Your first choice to locate the O&M Facility is on the property currently being used by the Christian Faith Center, So 336th St and So 344th St, Federal Way. This is the wrong location for such an operation. As the Washington State Tribes stated in 2021: Tens of millions of dollars were spent on property acquisition, habitat, restoration, contaminant, cleanup sites, and stream enhancements located downstream below the 336th – 344th sites. Pipelines and underground drainage conveyances offer no means of water treatment or groundwater recharge whatsoever, and are therefore viewed as incompatible with fish recovery. Many reaches of the Hylebos Creek that were formally whetted year-round are now EPHEMERAL. Reduced flow conditions are more susceptible to thermal inputs and rapid heating which puts additional stress on fish populations. Any further loss of water treatment opportunities and recharge are not an acceptable option for the tribes.

Your last choice to locate the Facility is the Midway Landfill. The cities of Kent, Des Moines and Federal Way stand in unison and approve the Midway landfill location.

I believe that the Midway Landfill is the best location for this Facility. The contaminated soil needs to be completely removed. This would be similar to the Superfund site in Tacoma where the Asarco smelter left a toxic legacy in the soil, groundwater, and sediments in Puget Sound. The cleanup began in 1983 and continues to this day. The Midway contaminated soil needs to be completely removed, not covered over.

In conclusion, the wetlands of the Hylebos Creek need to be protected, and the Midway landfill needs to be completely removed and put to better use. One better use would be your Facility.

Sincerely, Susan Strong

FW Resident since 1975, Born in Seattle

Susan Strong (Communications ID 539015)		
Comment ID	Comment Text	Response
1	Your first choice to locate the O&M Facility is on the property currently being used by the Christian Faith Center, So 336th St and So 344th St, Federal Way. This is the wrong location for such an operation.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	As the Washington State Tribes stated in 2021: Tens of millions of dollars were spent on property acquisition, habitat, restoration, contaminant, cleanup sites, and stream enhancements located downstream below the 336th – 344th sites. Pipelines and underground drainage conveyances offer no means of water treatment or groundwater recharge whatsoever, and are therefore viewed as incompatible with fish recovery. Many reaches of the Hylebos Creek that were formally whetted year-round are now EPHEMERAL. Reduced flow conditions are more susceptible to thermal inputs and rapid heating which puts additional stress on fish populations. Any further loss of water treatment opportunities and recharge are not an acceptable option for the tribes.	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS. Final EIS Section 3.10, Ecosystem Resources, and Appendix G3, Ecosystems Resources Technical Report, further detail the impacts and avoidance, minimization, and mitigation measures concerning Hylebos Creek.
3	<p>Your last choice to locate the Facility is the Midway Landfill. The cities of Kent, Des Moines and Federal Way stand in unison and approve the Midway landfill location.</p> <p>I believe that the Midway Landfill is the best location for this Facility. The contaminated soil needs to be completely removed. This would be similar to the Superfund site in Tacoma where the Asarco smelter left a toxic legacy in the soil, groundwater, and sediments in Puget Sound. The cleanup began in 1983 and continues to this day. The Midway contaminated soil needs to be completely removed, not covered over.</p> <p>In conclusion, the wetlands of the Hylebos Creek need to be protected, and the Midway landfill needs to be completely removed and put to better use. One better use would be your Facility.</p>	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

November 6, 2023

To: OMF South @ Erin Green

Sound Transit

401 Jackson Street

Seattle, WA 98104

I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way.

The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.

We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end (location to be determined) resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is unacceptable to expect that our city is to accommodate all of Sound Transits needs.

These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of community facilities, daycares and housing would further exploit and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are sufficient bus line options already in place.

There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way. This unseeming and inconsistent development would have devastating/catastrophic effects on businesses like Ellanos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.

Assumptions are being made by Sound Transit that our Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted. The Transportation Technical report is riddled with needed corrections and clarification, as well as disregarding emergency vehicles the ability to use S. 20th Ave. The suggested solution to bulldoze a road through a critical class 5 wetland is not an acceptable option as our water district operates within this area, serves as an aquifer recharge area and is home to numerous wildlife species.

The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, “we have commitments to stormwater management, site access, mitigation, and recreational areas. A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife, as the open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.

Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.

The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as **The Preferred** OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site, if the Federal government or the state would be invited to assist in the funding. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.

The Executive Summary consistently refers to the S. 336th Site as THE PREFERRED site which feels like a deliberate attempt to persuade the reader/voting public. I do not feel this is a fair representation of the three options before us.

I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed too quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.

Kerry Lesinski (Communications ID 539016)		
Comment ID	Comment Text	Response
1	I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS. Final EIS Section 3.10, Ecosystem Resources, and Appendix G3, Ecosystems Resources Technical Report, further detail the impacts and avoidance, minimization, and mitigation measures concerning Hylebos Creek.
3	We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end (location to be determined) resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is unacceptable to expect that our city is to accommodate all of Sound Transits needs.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
4	These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of community facilities, daycares and housing would further exploit and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are sufficient bus line options already in place.	Sound Transit and FTA have updated Final EIS Appendix E, Environmental Justice Assessment, and Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods, to discuss in greater detail the potential impacts to minority and low-income populations as well as project mitigation and benefits. After consideration of the additional analysis, FTA maintains the preliminary determination that OMF South would not result in disproportionately adverse effects on environmental justice populations.

Kerry Lesinski (Communications ID 539016)		
Comment ID	Comment Text	Response
5	There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way. This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellanos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church. Assumptions are being made by Sound Transit that our Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted.	An OMF would not have the same effects as a heavy industrial facility. The potential impacts of OMF South for the topics mentioned in the comment are described in Section 3.2, Transportation, and Section 3.9, Noise and Vibration, of the Final EIS.
6	The Transportation Technical report is riddled with needed corrections and clarification, as well as disregarding emergency vehicles the ability to use S. 20th Ave.	Appendix G1, Transportation Technical Analysis, and Section 3.2, Transportation, of the Final EIS have been updated to correct errors that were identified in the public comments. Potential impacts to emergency vehicle response times under the Preferred and South 344th Street alternatives are discussed in Section 3.14, Public Services.
7	<p>The suggested solution to bulldoze a road through a critical class 5 wetland is not an acceptable option as our water district operates within this area, serves as an aquifer recharge area and is home to numerous wildlife species.</p> <p>The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, "we have commitments to stormwater management, site access, mitigation, and recreational areas. A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife, as the open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.</p>	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Kerry Lesinski (Communications ID 539016)		
Comment ID	Comment Text	Response
8	Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.	Chapter 4, Cumulative Effects Analysis, discusses the potential cumulative impacts to each element of the environment, including ecosystem resources.
9	The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site, if the Federal government or the state would be invited to assist in the funding. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
10	I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed to quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.	The Fife sites were eliminated from further consideration because they are farther than 1.5 miles south of the FWLE terminus and would not be able to efficiently connect to an operating light rail mainline track when OMF South opens. The complete results of the alternatives evaluation are summarized in the OMF South Alternatives Technical Memorandum (Sound Transit 2019c).



Operations and Maintenance Facility South

Share your thoughts on our Draft EIS findings for OMF South

Comparta sus opiniones sobre los hallazgos de nuestro borrador de la EIS para OMF Sur

Поделитесь своими мыслями о нашем проекте выводов EIS для OMF South

OMF South에 대한 Draft EIS 조사 결과에 대한 귀하의 생각을 공유하십시오.

Do you have new comments about our environmental analysis? ¿Desea compartir nuevos comentarios sobre nuestros análisis ambientales? 환경 분석에 대해 공유하고 싶은 새로운 의견이 있으십니까? У вас есть новые комментарии по поводу проводимого нами экологического анализа?



Can we see more details on 55 mph option?
— We live in Unit 208
and online appears to be above our home.
Can we get more photos/plans, etc.?

CONTACT INFORMATION (OPTIONAL)/ INFORMACIÓN DE CONTACTO (OPCIONAL)/ КОНТАКТНАЯ ИНФОРМАЦИЯ (НЕОБЯЗАТЕЛЬНО)/ 연락처 정보(선택사항)

If you'd like us to notify you that we've included and responded to your comment in the Final EIS, please include your contact information.

Si desea que le notifiquemos que hemos incluido y respondido a su comentario en la EIS final, incluya su información de contacto.

Если вы хотите, чтобы мы уведомили вас о том, что мы включили ваш комментарий в окончательную версию EIS и ответили на него, укажите свою контактную информацию.

최종 EIS에 귀하의 의견을 포함하고 응답했음을 알리고 싶으시면 귀하의 연락처 정보를 포함해 주십시오.

Name/Nombre/Имя/이름 Miguel & Olivia Torres

Organization/Organización/ор

Address/Dirección/Адрес/주소

Email/Correo electrónico/Электронная почта

Phone number/Número de teléfono

Miguel Torres, Olivia Torres (Communications ID539020)		
Comment ID	Comment Text	Response
1	<p>Can we see more details on 55 mph option?</p> <p>We live in Unit 208 and online appears to be above our home. Can we get more photos/ plans, etc.?</p>	<p>Please see Final EIS Appendix C, Conceptual Design Drawings and Engineering Information, for the conceptual design plans for the 55 mph Design Option. A simulation of the alignment is included in Figure 3.7-5 of the Final EIS.</p>



Operations and Maintenance Facility South

Share your thoughts on our Draft EIS findings for OMF South

Comparta sus opiniones sobre los hallazgos de nuestro borrador de la EIS para OMF Sur

Поделитесь своими мыслями о нашем проекте выводов EIS для OMF South

OMF South에 대한 Draft EIS 조사 결과에 대한 귀하의 생각을 공유하십시오.

Do you have new comments about our environmental analysis? ¿Desea compartir nuevos comentarios sobre nuestros análisis ambientales? 환경 분석에 대해 공유하고 싶은 새로운 의견이 있으십니까? У вас есть новые комментарии по поводу проводимого нами экологического анализа?

I live in Belmar Park I have lived 4 yrs there I would not be affected but I am deeply concerned about the traffic effect, noise as to daytime, I understand people are being removed and Belmar isn't cooperating as I know many have asked to have the mobiles moved elsewhere in the park, but were told no open spots to move them plus some of the older people can't afford to move and increase their debt I hope that Sound Transit pay them and not make them homeless

CONTACT INFORMATION (OPTIONAL)/ INFORMACIÓN DE CONTACTO (OPCIONAL)/ КОНТАКТНАЯ ИНФОРМАЦИЯ (НЕОБЯЗАТЕЛЬНО)/ 연락처 정보(선택사항)

If you'd like us to notify you that we've included and responded to your comment in the Final EIS, please include your contact information.

Si desea que le notifiquemos que hemos incluido y respondido a su comentario en la EIS final, incluya su información de contacto.

Если вы хотите, чтобы мы уведомили вас о том, что мы включили ваш комментарий в окончательную версию EIS и ответили на него, укажите свою контактную информацию.

최종 EIS에 귀하의 의견을 포함하고 응답했음을 알리고 싶으시면 귀하의 연락처 정보를 포함해 주십시오.

Name/Nombre/Имя/이름

Helen Price

Organization/Organización

Address/Dirección/Адрес

Email/Correo electrónico/Электронная почта

Phone number/Número de teléfono

Helen Price (Communications ID 539021)		
Comment ID	Comment Text	Response
1	I live in Belmor Park. I have lived 4 years there. I would not be affected but I am deeply concerned about the traffic effect, noise as to daytime	Final EIS Section 3.2, Transportation, and Section 3.9, Noise and Vibration, discuss traffic and noise impacts. No traffic or noise impacts were identified from OMF operations. Noise from LRVs traveling along the mainline would be fully mitigated. Modification of the existing berm and noise walls adjacent to I-5 would result in traffic noise impacts at about one to three residences in Belmor. Sound Transit would provide traffic noise mitigation measures where traffic noise levels are predicted to be above the 2042 No-Build levels from removal of the existing berm and noise wall.
2	I understand people are being removed and Belmor isn't cooperating as I know many have asked to have the mobiles moved elsewhere in the park, but were told no open spots to move them plus some of the older people can't afford to move and increase their debt I hope that Sound Transit pay them and not make them homeless.	Final EIS Section 3.3.4, Sound Transit Acquisition and Relocation Policy Summary, outlines the process for compensation of property owners.



Operations and Maintenance Facility South

Share your thoughts on our Draft EIS findings for OMF South

Comparta sus opiniones sobre los hallazgos de nuestro borrador de la EIS para OMF Sur

Поделитесь своими мыслями о нашем проекте выводов EIS для OMF South

OMF South에 대한 Draft EIS 조사 결과에 대한 귀하의 생각을 공유하십시오.

Do you have new comments about our environmental analysis? ¿Desea compartir nuevos comentarios sobre nuestros análisis ambientales? 환경 분석에 대해 공유하고 싶은 새로운 의견이 있으십니까? У вас есть новые комментарии по поводу проводимого нами экологического анализа?

A WALL SHOULD BE MORE THAN 4' IF I LOOK OUT MY WINDOW AND CAN WATCH AT EVERYONE.

THE RAIL LOOKS LIKE IT'S GOING OVER HOMES IN THE PARK. IS THIS THE CASE?

CONTACT INFORMATION (OPTIONAL)/ INFORMACIÓN DE CONTACTO (OPCIONAL)/ КОНТАКТНАЯ ИНФОРМАЦИЯ (НЕОБЯЗАТЕЛЬНО)/ 연락처 정보(선택사항)

If you'd like us to notify you that we've included and responded to your comment in the Final EIS, please include your contact information.

Si desea que le notifiquemos que hemos incluido y respondido a su comentario en la EIS final, incluya su información de contacto.

Если вы хотите, чтобы мы уведомили вас о том, что мы включили ваш комментарий в окончательную версию EIS и ответили на него, укажите свою контактную информацию.

최종 EIS에 귀하의 의견을 포함하고 응답했음을 알리고 싶으시면 귀하의 연락처 정보를 포함해 주십시오.

Name/Nombre/Имя/이름

TILINA CORQUEZ

Organization/Organización/organización

Address/Dirección/Адрес/주소

Email/Correo electrónico/Электронная почта

Phone number/Número de teléfono/Телефон

Tilena Cooper (Communications ID 539023)		
Comment ID	Comment Text	Response
1	<p>A wall should be more than 4' if I look at my window and can wave at everyone.</p> <p>The rail likes like it's going over homes in the park. Is this the case?</p>	<p>The mainline track options for the Preferred and South 344th Street alternatives would be elevated mainline through the north end of Belmor before descending in elevation to travel at grade or on a retained fill slope through the south end of Belmor. The mainline would not travel directly over or immediately adjacent to any homes. Please see Figure 3.7-5 in Final EIS Section 3.7, Visual and Aesthetic Resources, for a conceptual rendering of the elevated mainline tracks through Belmor.</p>



Operations and Maintenance Facility South

Share your thoughts on our Draft EIS findings for OMF South

Comparta sus opiniones sobre los hallazgos de nuestro borrador de la EIS para OMF Sur

Поделитесь своими мыслями о нашем проекте выводов EIS для OMF South

OMF South에 대한 Draft EIS 조사 결과에 대한 귀하의 생각을 공유하십시오.

Do you have new comments about our environmental analysis? ¿Desea compartir nuevos comentarios sobre nuestros análisis ambientales? 환경 분석에 대해 공유하고 싶은 새로운 의견이 있으십니까? У вас есть новые комментарии по поводу проводимого нами экологического анализа?

How can you feel it is fair to dislocate SENIOR CITIZENS from their homes? There has to be a better route that wouldn't affect so many people. I think you felt the frustration in the room tonight. This is a terrible situation! These people felt they were in their "forever home" only to be forced out without any say in the matter. That's shameful! This is a beautiful place and you are going to destroy our peace and tranquility - for what!!? I know I am just one person and I

CONTACT INFORMATION (OPTIONAL)/ INFORMACIÓN DE CONTACTO (OPCIONAL)/ КОНТАКТНАЯ ИНФОРМАЦИЯ (НЕОБЯЗАТЕЛЬНО)/ 연락처 정보(선택사항)

(over)

If you'd like us to notify you that we've included and responded to your comment in the Final EIS, please include your contact information.

Si desea que le notifiquemos que hemos incluido y respondido a su comentario en la EIS final, incluya su información de contacto.

Если вы хотите, чтобы мы уведомили вас о том, что мы включили ваш комментарий в окончательную версию EIS и ответили на него, укажите свою контактную информацию.

최종 EIS에 귀하의 의견을 포함하고 응답했음을 알리고 싶으시면 귀하의 연락처 정보를 포함해 주십시오.

Name/Nombre/Имя/이름 _____

Organization/Organización/организация/조직 _____

Address/Dirección/Адрес/주소 _____

Email/Correo electrónico/Электронная почта/이메일 _____

Phone number/Número de teléfono/Номер телефона/전화 번호 _____

can't influence Sound Transit at all. I just
needed to let you know how you are affecting
my family and many others. I think it's
disgraceful!

Anonymous/Belmor Briefing (Communications ID 539026)		
Comment ID	Comment Text	Response
1	<p>How can you feel it is fair to dislocate SENIOR CITIZENS from their homes? There has to be a better route that wouldn't affect so many people. I think you felt the frustration in the room tonight. This is a terrible situation! These people felt they were in their "forever home" only to be forced out without any say in the matter. That's shameful! This is a beautiful place and you are going to destroy our peace and tranquility – for what!!? I know I am just one person and I can't influence Sound Transit at all. I just needed to let you know how you are affecting my family and many others. I think it's disgraceful!</p>	<p>Section 3.3.4, Sound Transit Acquisition and Relocation Policy Summary, outlines the process for compensation of property owners. The proposed mainline alignment location was determined through the TDLE alternative evaluation process, as detailed in the Tacoma Dome Link Extension Level 2 Alternatives Evaluation Report (Sound Transit 2019). Alternative alignments were ranked based on their ability to meet objectives, including (1) providing effective transportation solutions to meet mobility, access, and capacity needs; (2) supporting sustainable land use plans, transit-oriented development, and multimodal station access; (3) preserving the environment; and (4) supporting equitable mobility.</p>



Operations and Maintenance Facility South

Share your thoughts on our Draft EIS findings for OMF South

Comparta sus opiniones sobre los hallazgos de nuestro borrador de la EIS para OMF Sur

Поделитесь своими мыслями о нашем проекте выводов EIS для OMF South

OMF South에 대한 Draft EIS 조사 결과에 대한 귀하의 생각을 공유하십시오.

Do you have new comments about our environmental analysis? ¿Desea compartir nuevos comentarios sobre nuestros análisis ambientales? 환경 분석에 대해 공유하고 싶은 새로운 의견이 있으십니까? У вас есть новые комментарии по поводу проводимого нами экологического анализа?

My Name is Patricia M. Inguetti - Born in Tacoma almost 75 years ago I remember my father reading the paper every night. We discussed what would happen to the Candice area. I remember him saying that the city "fathers" were going to ^{hold onto} the land fill area "for some special use that would benefit the citizen in the years to come. That was in the late 50's & 60's. We've waited all these years. Why not use it now! That we are not displacing home-owners or business. Yes I realize it cost more, but our representative seems to find push what they

CONTACT INFORMATION (OPTIONAL)/ INFORMACIÓN DE CONTACTO (OPCIONAL)/ КОНТАКТНАЯ ИНФОРМАЦИЯ (НЕОБЯЗАТЕЛЬНО)/ 연락처 정보(선택사항) *Want through the dispute what others.*

If you'd like us to notify you that we've included and responded to your comment in the Final EIS, please include your contact information.

Si desea que le notifiquemos que hemos incluido y respondido a su comentario en la EIS final, incluya su información de contacto.

Если вы хотите, чтобы мы уведомили вас о том, что мы включили ваш комментарий в окончательную версию EIS и ответили на него, укажите свою контактную информацию.

최종 EIS에 귀하의 의견을 포함하고 응답했음을 알리고 싶으시면 귀하의 연락처 정보를 포함해 주십시오.

Name/Nombre/Имя/이름 _____

Organization/Organización/организация/조직 _____

Address/Dirección/Адрес/주소 _____

Email/Correo electrónico/Электронная почта/이메일 _____

Phone number/Número de teléfono/Номер телефона/전화 번호 _____

*What
Want.
Why
not
use
this
property
Now.*

*Live my whole life in Tacoma, Federal Way
Area. Now your going to take away my property. In "Garage
House"*

~~As a retired~~ I feel like I am being cheated out of
~~part~~ part of my ~~life~~ life that I worked hard for.
As a retired Boeing / Nasa employee of over 30
years, I don't think that you have been
taught to learn to your ~~past~~ history before you
try to change the present.

W

Patricia Pugnetti (Communications ID 539033)		
Comment ID	Comment Text	Response
1	I remember my father reading the paper every night. We discussed what would happen to the landfill area. I remember him saying that the city "fathers" were going to hold onto the "land" fill area for some special use that would benefit the citizens in the years to come. That was in the late 50's + 60's. We've waited all those years. Why not use it now! That we are not displacing homeowners or businesses. Yes I realize it cost more, but our representative seems to find push what they want thought despite what voters want. Why not use this property now.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	Live my whole life in Tacoma, Federal Way area. Now your [sic] going to take away my property. In "Garage Town". I feel like I am being cheated out of part of my life that I worked hard for.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Operations & Maintenance & Facility Location

Bob Strong [REDACTED]

Mon 11/6/2023 3:32 PM

To:OMF South <OMFsouth@soundtransit.org>

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

The following are comments regarding the proposed location of the Sound Transit OMF South Facility at the current location of a major church (Christian Faith) and school in Federal Way:

1. I recall that the down selection process for site location for this facility was interesting. One location was removed from consideration due to a Dick's Burgers being on the site. It's interesting how priorities (burgers over religion and education) and politics determine the location of infrastructure in this county/state.
2. The site with the least impact on **people** and the **environment** is the Midway Landfill site (full excavation option). The only logical and sensible solution for that land is to finally clean it up and use it for a practical purpose, such as OMF South. King County and /or the state of Washington should share in covering the cost of the cleanup of the site, then Sound Transit should build the facility on the cleaned up land after removal of the contaminated soil. There would be no displacement of churches, businesses, burger restaurants, schools, or impact to a sensitive environmental area (eg stream impacts, wetland impact or forest impact) (page ES-24 in the executive summary)
3. The cities of Federal Way, Kent and Des Moines have provided input that the Midway landfill site is the best location for OMF South. Please listen to their input.
4. The proposed site at the Christian Faith Center property would impact the Hylebos Creek and wetlands, without proper mitigation. The Washington State Tribes have pointed out that much money has been spent on this property for habitat restoration, containment , cleanup and stream enhancements located downstream below the 336th-344th sites. Pipelines and underground drainage offer no means of water treatment or groundwater recharge and are viewed as incompatible with fish recovery. Any further loss of water treatment opportunities and recharge are not an acceptable option for the tribes.
5. The Midway landfill site will not incur any real estate costs (which don't appear to be in the S. 336th st alternative estimate)

The Midway Landfill site is the obvious location for OMF South.

Thanks for your time.

Robert (Bob) Strong

Federal Way resident since 1981

Bob Strong (Communication ID 539034)		
Comment ID	Comment Text	Response
1	1. The cost estimates of the 3 options aren't that much different, especially when considering impact to people, streams, environment. The Midway/Kent option would take longer (perhaps) but impact the least people--- is the schedule really that important, given the delays already encountered?	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	2. What is the input from the Federal Way City Council and mayor?	The city of Federal Way submitted comment letters on both the 2021 SEPA Draft EIS and the 2023 NEPA Draft/SEPA Supplemental Draft EIS. See their comments and Sound Transit's responses in Appendix L1 above and in this appendix, L2.

Vickie Chynoweth

"Hello, my name is Vickie Chynoweth, and I guess I think about people more than I do about money. I think that the Midway Landfill would be the best alternative even though it's your lowest alternative here. When you start looking at the displacement for residential impact, it's zero on the Midway Landfill. If you look at the business displacement, there's only four, the community and social resource impacts, zero, estimated employee displacement, 43. You look at the other two, and it's all here. I don't need to read it, but this light rail system has been set back, set back, set back, and now you're saying it will take seven to eight years for us to build on the Midway Landfill. Well, let's get started now because it's been we were supposed to be done with Federal Way light rail in 2023. Then it was 2024. Then it was 2025. If we start now with the Midway Landfill, you could probably be done in seven or eight years, and we might be done with the Federal Way light rail. We're not going to be moving onto 356th or Tacoma for several years, so there's no need for the rush to displace all of these lives and businesses. Thank you."

Vickie Chynoweth (Communications ID 539042)		
Comment ID	Comment Text	Response
1	I think that the Midway Landfill would be the best alternative even though it's your lowest alternative here. When you start looking at the displacement for residential impact, it's zero on the Midway Landfill. If you look at the business displacement, there's only four, the community and social resource impacts, zero, estimated employee displacement, 43. You look at the other two, and it's all here.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	I don't need to read it, but this light rail system has been set back, set back, set back, and now you're saying it will take seven to eight years for us to build on the Midway Landfill. Well, let's get started now because it's been we were supposed to be done with Federal Way light rail in 2023. Then it was 2024. Then it was 2025. If we start now with the Midway Landfill, you could probably be done in seven or eight years, and we might be done with the Federal Way light rail. We're not going to be moving onto 356th or Tacoma for several years, so there's no need for the rush to displace all of these lives and businesses.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Michael Hoag

“Good evening, my name is Michael Hoag. I'm a Federal Way resident, and my biggest concern with the Midway Landfill is the uncertainties around everything I've read or heard about that, that we just don't know how much that's going to cost over time and how long it will take because of those costs over time.

I'm a big fan of really Option 1. I think that seems to have the most credence to me. Given the people who will have to be moved, that's part of really getting moving forward with this big project that we've been working on now for however many years and many years ahead of us still, so I'm a fan of Option 1.

I think that that makes a lot of sense, and I'm really looking forward to having the benefits of all the jobs of a maintenance facility supporting our community. Thank you.”

Michael Hog (Communications ID 539043)		
Comment ID	Comment Text	Response
1	<p>Good evening, my name is Michael Hoag. I'm a Federal Way resident, and my biggest concern with the Midway Landfill is the uncertainties around everything I've read or heard about that, that we just don't know how much that's going to cost over time and how long it will take because of those costs over time.</p>	<p>Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>
2	<p>I'm a big fan of really Option 1. I think that seems to have the most credence to me. Given the people who will have to be moved, that's part of really getting moving forward with this big project that we've been working on now for however many years and many years ahead of us still, so I'm a fan of Option 1.</p> <p>I think that that makes a lot of sense, and I'm really looking forward to having the benefits of all the jobs of a maintenance facility supporting our community. Thank you.</p>	<p>Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>

Bill Pugnetti

“Hello, Bill Pugnetti, Auburn, Washington, and I certainly agree with the first commenter. That's very good. I'm looking at your figures you had for the residential and business displacements in the preferred location in South 344th. Residential on the preferred show a figure of 15, and on 344th you show a figure of 20. Now, 344th includes Garage Town, and what you're not reflecting in your figures is that Garage Town is an extension of households. Those are garages and not all, but many of the folks have an extension of their home there. They park their motorhome, their boat, extra cars, storage of just family items that they can't accommodate at home and a mix of those, hobby equipment, whatever it is. You do not reflect the impact that that is having on households by giving a figure of 20. It's not where they live, but it's their household operation, their lifestyle, and their planning to do appropriately. Also, there's our businesses in Garage Town. You don't reflect the impact on those businesses. An ice cream company has three to five locations in there, and I know the restaurant in Tacoma, they work out of there with their supplies and extra furniture. Your figures are lacking in the impact on households and businesses for South 344th. They do not reflect real impact.”

Bill Pugnetti (Communications ID 539044)		
Comment ID	Comment Text	Response
1	<p>Hello, Bill Pugnetti, Auburn, Washington, and I certainly agree with the first commenter. That's very good. I'm looking at your figures you had for the residential and business displacements in the preferred location in South 344th. Residential on the preferred show a figure of 15, and on 344th you show a figure of 20. Now, 344th includes Garage Town, and what you're not reflecting in your figures is that Garage Town is an extension of households. Those are garages and not all, but many of the folks have an extension of their home there. They park their motorhome, their boat, extra cars, storage of just family items that they can't accommodate at home and a mix of those, hobby equipment, whatever it is. You do not reflect the impact that that is having on households by giving a figure of 20. It's not where they live, but it's their household operation, their lifestyle, and their planning to do appropriately. Also, there's our businesses in Garage Town. You don't reflect the impact on those businesses. An ice cream company has three to five locations in there, and I know the restaurant in Tacoma, they work out of there with their supplies and extra furniture. Your figures are lacking in the impact on households and businesses for South 344th. They do not reflect real impact</p>	<p>Please see the response to Common Comment 1 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>

Karen Brugato

"My name is Karen Brugato. I wanted to comment about the Midway Landfill. It was a logical choice for me. Down in Federal Way, we don't get just one. We get two light rail stations, and we get the OMF. That's three big chunks of land. I noticed Bellevue only has one station and a 25 acre OMF. Down in the central part of Seattle they have an OMF. It's 25 acres. The one in Federal Way is 66 acres. How can something be over twice as big? Maybe we should be called Sound Transit Way instead of Federal Way. I'm not quite sure, but if you notice, our representative on the Sound Transit board, Pete von Reichbauer, voted that it should be the OMF should be at the Midway Landfill. I think it should be there too. Please don't let money stand in the way. Don't let time stand in the way. In this day and age, grants are available. The administration is up for new things. Please have it be at the Midway Landfill for the OMF, thanks."

Karen Brugato (Communications ID 539045)		
Comment ID	Comment Text	Response
1	I wanted to comment about the Midway Landfill. It was a logical choice for me	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	Down in Federal Way, we don't get just one. We get two light rail stations, and we get the OMF. That's three big chunks of land. I noticed Bellevue only has one station and a 25 acre OMF. Down in the central part of Seattle they have an OMF. It's 25 acres. The one in Federal Way is 66 acres. How can something be over twice as big? Maybe we should be called Sound Transit Way instead of Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS. In Bellevue, OMF East is approximately 28 acres, and there are six stations. In Seattle, OMF Central is approximately 25 acres. As described in Chapter 2, Alternatives Considered, OMF South needs to be at least 59 acres to accommodate the functions of the facility.
3	I'm not quite sure, but if you notice, our representative on the Sound Transit board, Pete von Reichbauer, voted that it should be the OMF should be at the Midway Landfill. I think it should be there too. Please don't let money stand in the way. Don't let time stand in the way. In this day and age, grants are available. The administration is up for new things. Please have it be at the Midway Landfill for the OMF, thanks.	Please see the response to Common Comments 4 and 5 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Suzanne Vargo

"Lots of things to say. I'm quite concerned with the fact that this site was brought up late in the game. They've been working on this since 2015 of where your OMF would go, and this site was never considered. I do believe it is a conflict of interest with Mr. Pete von Reichbauer, who presented this to Sound Transit. He is on the board, and he is personal friends with the owner of the church, so that seems rather convenient, and the timing was rather interesting. The citizens of Federal Way fought for four years for environmental protections and mitigations when the church was built, and I just don't understand how we are able to go back and take that same 20 percent 20 years later. That's not usually something that is done. The land belongs with a concomitant agreement that runs forever along with the Weyerhaeuser campus. There are recreational restrictions. There is storm water management restrictions and requirements and a few others that need to be considered. I am concerned about the petroleum pipeline that runs along South 336th. It was one of the reasons we were able to stop a toxic fish warehouse on the campus because of the heavy loads traversing over that road, so that is a great concern of when we were hauling. I'm a huge advocate for the Hylebos watershed, and it is my belief that the east branch, which actually feeds two watersheds, the Green River and the Hylebos, will be extinguished. You got comments from the Tribe. That's just a few of the things I'm concerned about. You've already bulldozed the land and done great harm at this point. Thank you so much."

Suzanne Vargo (Communications ID 539046)		
Comment ID	Comment Text	Response
1	I'm quite concerned with the fact that this site was brought up late in the game. They've been working on this since 2015 of where your OMF would go, and this site was never considered. I do believe it is a conflict of interest with Mr. Pete von Reichbauer, who presented this to Sound Transit. He is on the board, and he is personal friends with the owner of the church, so that seems rather convenient, and the timing was rather interesting.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS. The South 336th Street Alternative (Preferred Alternative) was identified during the 2018 OMF South early scoping process. After an alternatives screening process and public and agency comments, in May 2019 the Sound Transit Board identified the South 336th Street Alternative for study in the Draft EIS, along with the South 344th Street Alternative and the Midway Landfill Alternative.
2	The citizens of Federal Way fought for four years for environmental protections and mitigations when the church was built, and I just don't understand how we are able to go back and take that same 20 percent 20 years later. That's not usually something that is done. The land belongs with a concomitant agreement that runs forever along with the Weyerhaeuser campus. There are recreational restrictions. There is storm water management restrictions and requirements and a few others that need to be considered. I am concerned about the petroleum pipeline that runs along South 336th. It was one of the reasons we were able to stop a toxic fish warehouse on the campus because of the heavy loads traversing over that road, so that is a great concern of when we were hauling. I'm a huge advocate for the Hylebos watershed, and it is my belief that the east branch, which actually feeds two watersheds, the Green River and the Hylebos, will be extinguished. You got comments from the Tribe. That's just a few of the things I'm concerned about. You've already bulldozed the land and done great harm at this point.	<p>Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS. A segment of the tributary to the East Fork Hylebos would be daylighted by the project under the Preferred Alternative. Final EIS Section 3.10, Ecosystem Resources, and Appendix G3, Ecosystems Resources Technical Report, further detail the impacts and avoidance, minimization, and mitigation measures concerning Hylebos Creek.</p> <p>Temporary impacts have occurred along the stream and buffer related to geotechnical borings. All appropriate permits and approvals were secured in advance of geotechnical investigations and temporarily disturbed soils have been restored.</p>

Francine Martin

"Hello, my name is Francine Martin. I am not a resident of any of these areas. My father in law and my mother in law are. They have been residents at Belmor Park for almost 25 years. This Christmas day will be 24 years. I agreed with the first commenter. That was actually a very good statement that it should be the landfill because it's less impact to people like them. Mom is 75. Dad just turned 79. They've been there for, like I said, quite a while. It's their retirement home, and it's just too much of a personal impact for people like this. Actually, our daughter Marielle is with mom right now, and she's been going to that home to spend time with them since her birth. That's all she knows as far as where her grandparents live, and if that landfill is an option that won't disrupt their lives, that is something we definitely agree with.

We'd like for you folks to really consider the things, the place that will not impact families like ours. The Martins have been a stronghold in this community for quite a while, and we'd like to stay that way. Thank you."

Francine Martin (Communications ID 539047)		
Comment ID	Comment Text	Response
1	I am not a resident of any of these areas. My father in law and my mother in law are. They have been residents at Belmor Park for almost 25 years. This Christmas day will be 24 years. I agreed with the first commenter. That was actually a very good statement that it should be the landfill because it's less impact to people like them.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Lawson Bronson

“My name is Lawson Bronson, and I've been a resident of Federal Way since 1973. I would like to again or I'd like to question why we're not looking at the Midway Landfill. I don't really understand why you're having so many problems with it. We were able to take the Asarco site, which had all sorts of terrible contamination, and we've now built four sets of condominiums over the top of that, and we can't put a work facility on the top of that landfill? It just doesn't make sense to me, and I'm an engineer by profession.”

Lawson Bronson (Communications ID 539048)		
Comment ID	Comment Text	Response
1	My name is Lawson Bronson, and I've been a resident of Federal Way since 1973. I would like to again or I'd like to question why we're not looking at the Midway Landfill. I don't really understand why you're having so many problems with it. We were able to take the Asarco site, which had all sorts of terrible contamination, and we've now built four sets of condominiums over the top of that, and we can't put a work facility on the top of that landfill? It just doesn't make sense to me, and I'm an engineer by profession	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Susan Strong

"Hi, I'm Susan Strong. I moved here in 1975. I grew up in Seattle, and I remember going to the Midway dump with my dad. It was really exiting. The previous gentleman had a good point about the Asarco mess in Tacoma. They managed to clean that up. I think it was a Superfund or something, got a lot of money to help clean that up. They cleaned it up and built those million dollar condos over there. I wouldn't live over there, but those people are happy. The Midway Landfill can be cleaned up and used for this project. Thank you.

Susan Strong (Communications ID 539049)		
Comment ID	Comment Text	Response
1	I grew up in Seattle, and I remember going to the Midway dump with my dad. It was really exiting. The previous gentleman had a good point about the Asarco mess in Tacoma. They managed to clean that up. I think it was a Superfund or something, got a lot of money to help clean that up. They cleaned it up and built those million dollar condos over there. I wouldn't live over there, but those people are happy. The Midway Landfill can be cleaned up and used for this project.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 539051

OMF South NEPA DEIS OOH Comment 16

10/31/2023

Eugene Onishchenko

The midway landfill in my opinion is the only way to go! It puts way less people out of employment and affects way less small business! It also does not affect the wetlands as much as the other 2 options!

Eugene Onishchenko (Communications ID 539051)		
Comment ID	Comment Text	Response
1	The midway landfill in my opinion is the only way to go! It puts way less people out of employment and affects way less small business! It also does not affect the wetlands as much as the other 2 options!	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 539052

OMF South NEPA DEIS OOH Comment 17

10/31/2023

Russ Hibbard

If you take my property located at 2011 So 341st pl Northwest Equipment Sales and rentals ! It would have catastrophic impact on our business as well as hundreds of our customers!

Russ Hibbard (Communications ID 539052)		
Comment ID	Comment Text	Response
1	If you take my property located at 2011 So 341st pl Northwest Equipment Sales and rentals! It would have catastrophic impact on our business as well as hundreds of our customers!	Please see Section 3.3.4, Sound Transit Acquisition and Relocation Policy Summary, for information on Sound Transit's policies for property acquisition.

Communication ID: 539053

OMF South NEPA DEIS OOH Comment 18

10/31/2023

William Terrance

I think the preferred alternative is the superior option. The greatest need for the light rail system is expansion, the other options take longer for construction to complete. Not only does construction have a greater impact on the environment it is also difficult to anticipate the necessary closures and needs for different routes for residents in the area.

William Terrance (Communications ID 539053)		
Comment ID	Comment Text	Response
1	I think the preferred alternative is the superior option. The greatest need for the light rail system is expansion, the other options take longer for construction to complete. Not only does construction have a greater impact on the environment it is also difficult to anticipate the necessary closures and needs for different routes for residents in the area.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

Communication ID: 539054

OMF South NEPA DEIS OOH Comment 19

10/31/2023

Bruce Tecklenburg

If you use one of the two Federal Way sites, you don't need a test track because all of the track from 320th to 344th is not revenue service track. You can use that track as test track. Save the tax payers a couple of bucks and knock the test track off the plan until you actually extend the line and put it into service. You can also use mainline for testing trains. Just use signals and switches or off peak times. Stop wasting money

Bruce Tecklenburg (Communications ID 539054)		
Comment ID	Comment Text	Response
1	If you use one of the two Federal Way sites, you don't need a test track because all of the track from 320th to 344th is not revenue service track. You can use that track as test track. Save the tax payers a couple of bucks and knock the test track off the plan until you actually extend the line and put it into service. You can also use mainline for testing trains. Just use signals and switches or off peak times. Stop wasting money	If either the Preferred or South 344th Street alternative is selected as the project to be built, a test track would be necessary. As the commenter notes, the mainline track connecting the OMF South to the FWLE terminus would be used in the morning and night to deploy trains and thus would be unused for most of the day. However, if TDLE is constructed, this length of mainline would become part of the active Link system and would be unavailable for use as a test track. It would be more efficient from a schedule and a cost standpoint to construct the test track at the same time as the mainline. Constructing the test track at the same time as the mainline would also reduce the duration of construction, minimizing impacts to the adjacent land uses.

Communication ID: 539055

OMF South NEPA DEIS OOH Comment 20

10/31/2023

Finn S

I think that they are good alternatives, but I would like to see a bigger OMF that can address capacity issues that we currently see in the future. I would also like to ask if the midway landfill option would be dependent or independent on TDLE, meaning that if there are delays to TDLE that the midway landfill could open up sooner.

Finn S (Communications ID 539055)		
Comment ID	Comment Text	Response
1	I think that they are good alternatives, but I would like to see a bigger OMF that can address capacity issues that we currently see in the future.	As described in Chapter 2, Alternatives Considered, of the Final EIS, the OMF South has been sized to meet the operational needs of Sound Transit as set out in the Sound Transit 3 Plan.
2	I would also like to ask if the midway landfill option would be dependent or independent on TDLE, meaning that if there are delays to TDLE that the midway landfill could open up sooner.	None of the proposed OMF South build alternatives are dependent on the development of TDLE. As outlined in the Purpose and Need statement for the project in Chapter 1 of the Final EIS, the current regional system lacks a facility with sufficient capacity and suitable location to support the efficient and reliable long-term operations for system-wide Link light rail expansion, including the next phase of expansion in King and Pierce counties.

OMF South NEPA DEIS OOH Comment 21

11/02/2023

Jacob Davidson

Hello, I live at 1830 S. 336th street in Federal way. I have serious concerns about the budling and living next to a OMF directly across the street from my home. I worry about the noise while building and after when it is up and running. I have concerns of the noise affecting quality of life for me and my community. I worry that my homes value will plummet and I think I will have a hard time selling, especially during construction. Looking at the environmental impacts. The preferred site directly across the street from my condo complex will affect 2.7 acres of wetlands, 1500 feet of streams and 11 acres of mature native Forrest. As a native Pacific Northwest resident the rate at which our beautiful evergreen trees are disappearing is alarming. They recently took down several acres of trees to the north of my condos to build 94 townhomes. I can now hear I-5 in my bedroom and I worry that it will get even worse if Sound Transit takes out 11 more acres of Forrest. I work at a local hospital as an monitor tech, I watch patient's hearts and alert nurses of changes and lethal cardiac events. Would you want a person monitoring your heart or a families members heart who can not sleep because of freeway noise and construction noise, not to mention it will be a 24/7 facility. I would move now but everything is so expensive and once the construction is announced I fear I will owe more than I will be able to get for my condo. I understand that the midway station will cost more but what else can be done with that area? To me using the midway landfill is the preferred area and best for the environment. We must try to reduce our carbon footprint and chopping down 11 acres of Forrest, reducing wetlands and affecting a stream will not do our planet any favors. I feel midway is the best option and the name says it all, "mid - way" between Seattle and Tacoma, it uses land otherwise useless and would save 11 acres of trees, homes for animals and a sound / pollution buffer for Interstate 5. Please do not build OMF next to my home. Sincerely, Jacob Davison

Jacob Davidson (Communication ID 539056)		
Comment ID	Comment Text	Response
1	Hello, I live at 1830 S. 336th street in Federal way. I have serious concerns about the budling and living next to a OMF directly across the street from my home. I worry about the noise while building and after when it is up and running. I have concerns of the noise affecting quality of life for me and my community. I worry that my homes value will plummet and I think I will have a hard time selling, especially during construction.	Please see Final EIS Section 3.9, Noise and Vibration, for a discussion of potential construction and operational impacts and the avoidance, minimization, and mitigation measures to address those impacts.
2	Looking at the environmental impacts. The preferred site directly across the street from my condo complex will affect 2.7 acres of wetlands, 1500 feet of streams and 11 acres of mature native Forrest. As a native Pacific Northwest resident the rate at which our beautiful evergreen trees are disappearing is alarming. They recently took down several acres of trees to the north of my condos to build 94 townhomes.	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS.
3	I can now hear I-5 in my bedroom and I worry that it will get even worse if Sound Transit takes out 11 more acres of Forrest. I work at a local hospital as an monitor tech, I watch patient's hearts and alert nurses of changes and lethal cardiac events. Would you want a person monitoring your heart or a families members heart who can not sleep because of freeway noise and construction noise, not to mention it will be a 24/7 facility. I would move now but everything is so expensive and once the construction is announced I fear I will owe more than I will be able to get for my condo.	Please see Final EIS Section 3.9, Noise and Vibration, for a discussion of potential construction and operational impacts. No noise impacts were identified from motor vehicle traffic associated with OMF operations, and noise from LRVs traveling along the mainline would be fully mitigated. Modification of the existing berm and noise walls adjacent to I-5 would result in traffic noise impacts at about one to three residences in Belmor. Sound Transit would provide traffic noise mitigation measures where traffic noise levels are predicted to be above the 2042 No-Build levels from removal of the existing berm and noise wall.
4	I understand that the midway station will cost more but what else can be done with that area? To me using the midway landfill is the preferred area and best for the environment. We must try to reduce our carbon footprint and chopping down 11 acres of Forrest, reducing wetlands and affecting a stream will not do our planet any favors. I feel midway is the best option and the name says it all, "mid - way" between Seattle and Tacoma, it uses land otherwise useless and would save 11 acres of trees, homes for animals and a sound / pollution buffer for Interstate 5. Please do not build OMF next to my home.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.

OMF South NEPA DEIS OOH Comment 22

11/06/2023

Lani Akers

I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way. The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation. We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end, resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is outrageous to expect that our city is to accommodate all of Sound Transits needs, especially one that is industrialized and goes against city developmental policies. These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of housing, community facilities, daycares would further exploit our community members and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are current bus line options already in place. There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way. This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellanos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church. Assumptions are being made by Sound Transit that our city's Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted. There is a distinction between "working with the city" and expecting the city to disregard their policies. The Transportation Technical report needs to be corrected and clarified on numerous issues. This includes eliminating 20th Ave. S., as this is the only access for emergency vehicles. Any delay in response time can have serious negative health impacts to our community members. The suggested solution to bulldoze a road through a critical wetland is also not an acceptable option. Mitigations took place in 1994, our water district operates within this area, it serves as an aquifer recharge area and is home to numerous wildlife species. The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, "we have commitments to stormwater management, site access, mitigation, and recreational areas." A reminder

that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife. The open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources. Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated portions of the East Branch of the Hylebos, a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise. The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site. if the Federal government or the state would be invited to assist in the funding, according to public conversations posted, between Sound Transit planners and engineers. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way. I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed too quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward. Respectfully submitted by Lani Akers resident [REDACTED]

Lani Akers (Communication ID 539057)		
Comment ID	Comment Text	Response
1	I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 1.
2	The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 2.
3	We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end, resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is outrageous to expect that our city is to accommodate all of Sound Transits needs, especially one that is industrialized and goes against city developmental policies.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 3.
4	These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of housing, community facilities, daycares would further exploit our community members and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are current bus line options already in place.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 4..

Lani Akers (Communication ID 539057)		
Comment ID	Comment Text	Response
5	<p>There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way. This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellanos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church. Assumptions are being made by Sound Transit that our city's Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted. There is a distinction between "working with the city" and expecting the city to disregard their policies.</p>	<p>Please see the response to Kerry Lesinski (Communications ID 539016) comment 5.</p>
6	<p>The Transportation Technical report needs to be corrected and clarified on numerous issues. This includes eliminating 20th Ave. S., as this is the only access for emergency vehicles. Any delay in response time can have serious negative health impacts to our community members.</p>	<p>Please see the response to Kerry Lesinski (Communications ID 539016) comment 6.</p>
7	<p>The suggested solution to bulldoze a road through a critical wetland is also not an acceptable option. Mitigations took place in 1994, our water district operates within this area, it serves as an aquifer recharge area and is home to numerous wildlife species. The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, "we have commitments to stormwater management, site access, mitigation, and recreational areas." A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife. The open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.</p>	<p>Please see the response to Kerry Lesinski (Communications ID 539016) comment 7.</p>

Lani Akers (Communication ID 539057)		
Comment ID	Comment Text	Response
8	Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated portions of the East Branch of the Hylebos, a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 8.
9	The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site. if the Federal government or the state would be invited to assist in the funding, according to public conversations posted, between Sound Transit planners and engineers. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 9.
10	I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed to quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 10.

November 6, 2023

To: OMF South @ Erin Green

Sound Transit

401 Jackson Street

Seattle, WA 98104

I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way.

The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.

We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end (location to be determined) resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is unacceptable to expect that our city is to accommodate all of Sound Transits needs.

These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of community facilities, daycares and housing would further exploit and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are sufficient bus line options already in place.

There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way. This unseeming and inconsistent development would have devastating/catastrophic effects on businesses like Ellanos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.

Assumptions are being made by Sound Transit that our Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted. The Transportation Technical report is riddled with needed corrections and clarification, as well as disregarding emergency vehicles the ability to use S. 20th Ave. The suggested solution to bulldoze a road through a critical class 5 wetland is not an acceptable option as our water district operates within this area, serves as an aquifer recharge area and is home to numerous wildlife species.

The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, “we have commitments to stormwater management, site access, mitigation, and recreational areas. A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife, as the open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.

Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.

The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as **The Preferred** OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site, if the Federal government or the state would be invited to assist in the funding. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.

The Executive Summary consistently refers to the S. 336th Site as THE PREFERRED site which feels like a deliberate attempt to persuade the reader/voting public. I do not feel this is a fair representation of the three options before us.

I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed too quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.

Suzanne Vargo (Communications ID 539061)		
Comment ID	Comment Text	Response
1	I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS. Final EIS Section 3.10, Ecosystem Resources, and Appendix G3, Ecosystems Resources Technical Report, further detail the impacts and avoidance, minimization, and mitigation measures concerning Hylebos Creek.
3	We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end (location to be determined) resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is unacceptable to expect that our city is to accommodate all of Sound Transits needs.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
4	These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of community facilities, daycares and housing would further exploit and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are sufficient bus line options already in place.	Sound Transit and FTA have updated Final EIS Appendix E, Environmental Justice Assessment, and Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods, to discuss in greater detail the potential impacts to minority and low-income populations as well as project mitigation and benefits. After consideration of the additional analysis, FTA maintains the preliminary determination that OMF South would not result in disproportionately adverse effects on environmental justice populations.

Suzanne Vargo (Communications ID 539061)		
Comment ID	Comment Text	Response
5	<p>There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way. This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellanos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.</p> <p>Assumptions are being made by Sound Transit that our Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted.</p>	<p>An OMF would not have the same effects as a heavy industrial facility. The potential impacts of OMF South for the topics mentioned in the comment are described in Section 3.2, Transportation, and Section 3.9, Noise and Vibration, of the Final EIS.</p>
6	<p>The Transportation Technical report is riddled with needed corrections and clarification, as well as disregarding emergency vehicles the ability to use S. 20th Ave.</p>	<p>Appendix G1, Transportation Technical Analysis, and Section 3.2, Transportation, of the Final EIS have been updated to correct errors that were identified in the public comments. Potential impacts to emergency vehicle response times under the Preferred and South 344th Street alternatives are discussed in Section 3.14, Public Services.</p>
7	<p>The suggested solution to bulldoze a road through a critical class 5 wetland is not an acceptable option as our water district operates within this area, serves as an aquifer recharge area and is home to numerous wildlife species.</p> <p>The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, “we have commitments to stormwater management, site access, mitigation, and recreational areas. A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife, as the open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.</p>	<p>Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>

Suzanne Vargo (Communications ID 539061)		
Comment ID	Comment Text	Response
8	Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.	Chapter 4, Cumulative Effects Analysis, discusses the potential cumulative impacts to each element of the environment, including ecosystem resources.
9	The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site, if the Federal government or the state would be invited to assist in the funding. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
10	I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed to quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.	The Fife sites were eliminated from further consideration because they are farther than 1.5 miles south of the FWLE terminus and would not be able to efficiently connect to an operating light rail mainline track when OMF South opens. The complete results of the alternatives evaluation are summarized in the OMF South Alternatives Technical Memorandum (Sound Transit 2019c).

November 6, 2023

To: OMF South @ Erin Green

Sound Transit

401 Jackson Street

Seattle, WA 98104

I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way.

The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.

We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end (location to be determined) resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is unacceptable to expect that our city is to accommodate all of Sound Transits needs.

These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of community facilities, daycares and housing would further exploit and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are sufficient bus line options already in place.

There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way. This unseeming and inconsistent development would have devastating/catastrophic effects on businesses like Ellanos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.

Assumptions are being made by Sound Transit that our Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted. The Transportation Technical report is riddled with needed corrections and clarification, as well as disregarding emergency vehicles the ability to use S. 20th Ave. The suggested solution to bulldoze a road through a critical class 5 wetland is not an acceptable option as our water district operates within this area, serves as an aquifer recharge area and is home to numerous wildlife species.

The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, “we have commitments to stormwater management, site access, mitigation, and recreational areas. A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife, as the open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.

Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.

The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as **The Preferred** OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site, if the Federal government or the state would be invited to assist in the funding. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.

The Executive Summary consistently refers to the S. 336th Site as THE PREFERRED site which feels like a deliberate attempt to persuade the reader/voting public. I do not feel this is a fair representation of the three options before us.

I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed too quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.

Dave Lesinski (Communications ID 539062)		
Comment ID	Comment Text	Response
1	I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS. Final EIS Section 3.10, Ecosystem Resources, and Appendix G3, Ecosystems Resources Technical Report, further detail the impacts and avoidance, minimization, and mitigation measures concerning Hylebos Creek.
3	We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end (location to be determined) resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is unacceptable to expect that our city is to accommodate all of Sound Transits needs.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
4	These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of community facilities, daycares and housing would further exploit and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are sufficient bus line options already in place.	Sound Transit and FTA have updated Final EIS Appendix E, Environmental Justice Assessment, and Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods, to discuss in greater detail the potential impacts to minority and low-income populations as well as project mitigation and benefits. After consideration of the additional analysis, FTA maintains the preliminary determination that OMF South would not result in disproportionately adverse effects on environmental justice populations.

Dave Lesinski (Communications ID 539062)		
Comment ID	Comment Text	Response
5	<p>There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way. This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellenos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.</p> <p>Assumptions are being made by Sound Transit that our Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted.</p>	<p>An OMF would not have the same effects as a heavy industrial facility. The potential impacts of OMF South for the topics mentioned in the comment are described in Section 3.2, Transportation, and Section 3.9, Noise and Vibration, of the Final EIS.</p>
6	<p>The Transportation Technical report is riddled with needed corrections and clarification, as well as disregarding emergency vehicles the ability to use S. 20th Ave.</p>	<p>Appendix G1, Transportation Technical Analysis, and Section 3.2, Transportation, of the Final EIS have been updated to correct errors that were identified in the public comments. Potential impacts to emergency vehicle response times under the Preferred and South 344th Street alternatives are discussed in Section 3.14, Public Services.</p>
7	<p>The suggested solution to bulldoze a road through a critical class 5 wetland is not an acceptable option as our water district operates within this area, serves as an aquifer recharge area and is home to numerous wildlife species.</p> <p>The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, “we have commitments to stormwater management, site access, mitigation, and recreational areas. A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife, as the open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.</p>	<p>Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>

Dave Lesinski (Communications ID 539062)		
Comment ID	Comment Text	Response
8	Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.	Chapter 4, Cumulative Effects Analysis, discusses the potential cumulative impacts to each element of the environment, including ecosystem resources.
9	The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site, if the Federal government or the state would be invited to assist in the funding. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
10	I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed to quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.	The Fife sites were eliminated from further consideration because they are farther than 1.5 miles south of the FWLE terminus and would not be able to efficiently connect to an operating light rail mainline track when OMF South opens. The complete results of the alternatives evaluation are summarized in the OMF South Alternatives Technical Memorandum (Sound Transit 2019c).

Operations & Maintenance & Facility Location

Bob Strong [REDACTED]

Mon 11/6/2023 3:32 PM

To:OMF South <OMFsouth@soundtransit.org>

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

The following are comments regarding the proposed location of the Sound Transit OMF South Facility at the current location of a major church (Christian Faith) and school in Federal Way:

1. I recall that the down selection process for site location for this facility was interesting. One location was removed from consideration due to a Dick's Burgers being on the site. It's interesting how priorities (burgers over religion and education) and politics determine the location of infrastructure in this county/state.
2. The site with the least impact on **people** and the **environment** is the Midway Landfill site (full excavation option). The only logical and sensible solution for that land is to finally clean it up and use it for a practical purpose, such as OMF South. King County and /or the state of Washington should share in covering the cost of the cleanup of the site, then Sound Transit should build the facility on the cleaned up land after removal of the contaminated soil. There would be no displacement of churches, businesses, burger restaurants, schools, or impact to a sensitive environmental area (eg stream impacts, wetland impact or forest impact) (page ES-24 in the executive summary)
3. The cities of Federal Way, Kent and Des Moines have provided input that the Midway landfill site is the best location for OMF South. Please listen to their input.
4. The proposed site at the Christian Faith Center property would impact the Hylebos Creek and wetlands, without proper mitigation. The Washington State Tribes have pointed out that much money has been spent on this property for habitat restoration, containment , cleanup and stream enhancements located downstream below the 336th-344th sites. Pipelines and underground drainage offer no means of water treatment or groundwater recharge and are viewed as incompatible with fish recovery. Any further loss of water treatment opportunities and recharge are not an acceptable option for the tribes.
5. The Midway landfill site will not incur any real estate costs (which don't appear to be in the S. 336th st alternative estimate)

The Midway Landfill site is the obvious location for OMF South.

Thanks for your time.

Robert (Bob) Strong

Federal Way resident since 1981

Bob Strong (Communications ID 539063)		
Comment ID	Comment Text	Response
1	<p>The following are comments regarding the proposed location of the Sound Transit OMF South Facility at the current location of a major church (Christian Faith) and school in Federal Way:</p> <p>I recall that the down selection process for site location for this facility was interesting. One location was removed from consideration due to a Dick's Burgers being on the site. It's interesting how priorities (burgers over religion and education) and politics determine the location of infrastructure in this county/state.</p> <p>The site with the least impact on people and the environment is the Midway Landfill site (full excavation option). The only logical and sensible solution for that land is to finally clean it up and use it for a practical purpose, such as OMF South. King County and /or the state of Washington should share in covering the cost of the cleanup of the site, then Sound Transit should build the facility on the cleaned up land after removal of the contaminated soil. There would be no displacement of churches, businesses, burger restaurants, schools, or impact to a sensitive environmental area (eg stream impacts, wetland impact or forest impact) (page ES-24 in the executive summary)</p> <p>The cities of Federal Way, Kent and Des Moines have provided input that the Midway landfill site is the best location for OMF South. Please listen to their input.</p>	<p>The alternatives development process for the project is described in Section 2.2 of Chapter 2, Alternatives Development and Scoping, of the Final EIS. Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>
2	<p>The proposed site at the Christian Faith Center property would impact the Hylebos Creek and wetlands, without proper mitigation. The Washington State Tribes have pointed out that much money has been spent on this property for habitat restoration, containment, cleanup and stream enhancements located downstream below the 336th-344th sites. Pipelines and underground drainage offer no means of water treatment or groundwater recharge and are viewed as incompatible with fish recovery. Any further loss of water treatment opportunities and recharge are not an acceptable option for the tribes.</p>	<p>Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>
3	<p>The Midway landfill site will not incur any real estate costs (which don't appear to be in the S. 336th st alternative estimate)</p> <p>The Midway Landfill site is the obvious location for OMF South.</p>	<p>The majority of the Midway Landfill Alternative site is owned by the City of Seattle. If selected as the project to be built, Sound Transit would lease the property from the city. Table 2.5-1, Opinion of Probable Cost for Preliminary Engineering Design of the Build Alternatives, in the Final EIS lists estimated real estate and relocation costs for each alternative.</p>

OPPOSITION LETTER, due 11/6/2023

Julie Seitz [REDACTED]

Mon 11/6/2023 3:37 PM

To:OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

November 6, 2023

OMF South Project
c/o Erin Green
Sound Transit
401 Jackson Street
Seattle, WA 98104

RE: OPPOSITION LETTER, due 11/6/2023

I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the City of Federal Way.

The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic invertebrates that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.

We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our city's core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end (location to be determined) resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is unacceptable to expect that our city is to accommodate all of Sound Transit's needs.

These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of community facilities, daycares and housing would further exploit and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are sufficient bus line options already in place.

There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the City of Federal Way. This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellenos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.

Assumptions are being made by Sound Transit that our Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted. The Transportation Technical report is riddled with needed corrections and clarification, as well as disregarding emergency vehicles the ability to use S. 20th Ave. The suggested solution to bulldoze a road through a critical class 5 wetland is not an acceptable option as our water district operates within this area, serves as an aquifer recharge area and is home to numerous wildlife species.

The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, “we have commitments to stormwater management, site access, mitigation, and recreational areas”. A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents, domestic animals, and wildlife, as the open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.

Sound Transit, King County and the City of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus have already negated a head water tributary that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.

The Cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the City of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site if the federal government or the state would be invited to assist in the funding. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way. The Executive Summary consistently refers to the S. 336th Site as The Preferred site which feels like a deliberate attempt to persuade the reader/voting public. I do not feel this is a fair representation of the three options before us.

I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed too quickly, due to a lag of a mere 22 seconds in train journey travel in regard to reaching its set destinations. Surely this can be managed by qualified personnel at Sound Transit, and should be a priority task moving forward.

Sincerely,

Julie Seitz



Citizen of Federal Way since 1986

Julie Seitz (Communications ID 539077)		
Comment ID	Comment Text	Response
1	I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the City of Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic invertebrates that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonids. The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS. Final EIS Section 3.10, Ecosystem Resources, and Appendix G3, Ecosystems Resources Technical Report, further detail the impacts and avoidance, minimization, and mitigation measures concerning Hylebos Creek.
3	We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our city's core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end (location to be determined) resulting in more considerable business and traffic impacts. Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is unacceptable to expect that our city is to accommodate all of Sound Transit's needs.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
4	These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of community facilities, daycares and housing would further exploit and fortify their economic struggle. To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are sufficient bus line options already in place.	Sound Transit and FTA have updated Final EIS Appendix E, Environmental Justice Assessment, and Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods, to discuss in greater detail the potential impacts to minority and low-income populations as well as project mitigation and benefits. After consideration of the additional analysis, FTA maintains the preliminary determination that OMF South would not result in disproportionately adverse effects on environmental justice populations.

Julie Seitz (Communications ID 539077)		
Comment ID	Comment Text	Response
5	<p>There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the City of Federal Way. This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellenos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.</p> <p>Assumptions are being made by Sound Transit that our Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted.</p>	<p>An OMF would not have the same effects as a heavy industrial facility. The potential impacts of OMF South for the topics mentioned in the comment are described in Section 3.2, Transportation, and Section 3.9, Noise and Vibration, of the Final EIS.</p>
6	<p>The Transportation Technical report is riddled with needed corrections and clarification, as well as disregarding emergency vehicles the ability to use S. 20th Ave.</p>	<p>Appendix G1, Transportation Technical Analysis, and Section 3.2, Transportation, of the Final EIS have been updated to correct errors that were identified in the public comments. Potential impacts to emergency vehicle response times under the Preferred and South 344th Street alternatives are discussed in Section 3.14, Public Services.</p>
7	<p>The suggested solution to bulldoze a road through a critical class 5 wetland is not an acceptable option as our water district operates within this area, serves as an aquifer recharge area and is home to numerous wildlife species.</p> <p>The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, "we have commitments to stormwater management, site access, mitigation, and recreational areas". A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents, domestic animals, and wildlife, as the open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.</p>	<p>Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>

Julie Seitz (Communications ID 539077)		
Comment ID	Comment Text	Response
8	Sound Transit, King County and the City of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus have already negated a head water tributary that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.	Chapter 4, Cumulative Effects Analysis, discusses the potential cumulative impacts to each element of the environment, including ecosystem resources.
9	The Cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the City of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site if the federal government or the state would be invited to assist in the funding. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
10	I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed too quickly, due to a lag of a mere 22 seconds in train journey travel in regard to reaching its set destinations. Surely this can be managed by qualified personnel at Sound Transit, and should be a priority task moving forward.	The Fife sites were eliminated from further consideration because they are farther than 1.5 miles south of the FWLE terminus and would not be able to efficiently connect to an operating light rail mainline track when OMF South opens. The complete results of the alternatives evaluation are summarized in the OMF South Alternatives Technical Memorandum (Sound Transit 2019c).

OMF concerns

JACOB DAVISON [REDACTED]

Thu 11/2/2023 10:18 PM

To:OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Hello, I live at [REDACTED] in Federal way. I have serious concerns about the budling and living next to a OMF directly across the street from my home. I worry about the noise while building and after when it is up and running. I have concerns of the noise affecting quality of life for me and my community. I worry that my homes value will plummet and I think I will have a hard time selling, especially during construction. Looking at the environmental impacts. The preferred site directly across the street from my condo complex will affect 2.7 acres of wetlands, 1500 feet of streams and 11 acres of mature native Forrest. As a native Pacific Northwest resident the rate at which our beautiful evergreen trees are disappearing is alarming. They recently took down several acres of trees to the north of my condos to build 94 townhomes. I can now hear I-5 in my bedroom and I worry that it will get even worse if Sound Transit takes out 11 more acres of Forrest. I work at a local hospital as an monitor tech, I watch patient's hearts and alert nurses of changes and lethal cardiac events. Would you want a person monitoring your heart or a families members heart who can not sleep because of freeway noise and construction noise, not to mention it will be a 24/7 facility. I would move now but everything is so expensive and once the construction is announced I fear I will owe more than I will be able to get for my condo. I understand that the midway station will cost more but what else can be done with that area? To me using the midway landfill is the preferred area and best for the environment. We must try to reduce our carbon footprint and chopping down 11 acres of Forrest, reducing wetlands and affecting a stream will not do our planet any favors. I feel midway is the best option and the name says it all, "mid - way" between Seattle and Tacoma, it uses land otherwise useless and would save 11 acres of trees, homes for animals and a sound / pollution buffer for Interstate 5. Please do not build OMF next to my home.

Sincerely,

Jacob Davison
[REDACTED]

Jacob Davidson (Communications ID 539081)		
Comment ID	Comment Text	Response
1	Hello, I live at 1830 S. 336th street in Federal way. I have serious concerns about the budling and living next to a OMF directly across the street from my home. I worry about the noise while building and after when it is up and running. I have concerns of the noise affecting quality of life for me and my community. I worry that my homes value will plummet and I think I will have a hard time selling, especially during construction.	Please see response to Jacob Davidson (Communication ID 539056) comment 1.
2	Looking at the environmental impacts. The preferred site directly across the street from my condo complex will affect 2.7 acres of wetlands, 1500 feet of streams and 11 acres of mature native Forrest. As a native Pacific Northwest resident the rate at which our beautiful evergreen trees are disappearing is alarming. They recently took down several acres of trees to the north of my condos to build 94 townhomes.	Please see response to Jacob Davidson (Communication ID 539056) comment 2.
3	I work at a local hospital as an monitor tech, I watch patient's hearts and alert nurses of changes and lethal cardiac events. Would you want a person monitoring your heart or a families members heart who can not sleep because of freeway noise and construction noise, not to mention it will be a 24/7 facility. I would move now but everything is so expensive and once the construction is announced I fear I will owe more than I will be able to get for my condo.	Please see response to Jacob Davidson (Communication ID 539056) comment 2.
4	I understand that the midway station will cost more but what else can be done with that area? To me using the midway landfill is the preferred area and best for the environment. We must try to reduce our carbon footprint and chopping down 11 acres of Forrest, reducing wetlands and affecting a stream will not do our planet any favors. I feel midway is the best option and the name says it all, "mid – way" between Seattle and Tacoma, it uses land otherwise useless and would save 11 acres of trees, homes for animals and a sound / pollution buffer for Interstate 5. Please do not build OMF next to my home.	Please see response to Jacob Davidson (Communication ID 539056) comment 4.

GarageTown Federal Way Condominium Association

2010 S 344th St
Federal Way WA 98003
425 503 2000
mill425@comcast.net

November 4, 2023

OMF South
% Elma Borbe, Sr. Environmental Planner
Sound Transit
401 S Jackson Street
Seattle, WA 98104

To Sound Transit,

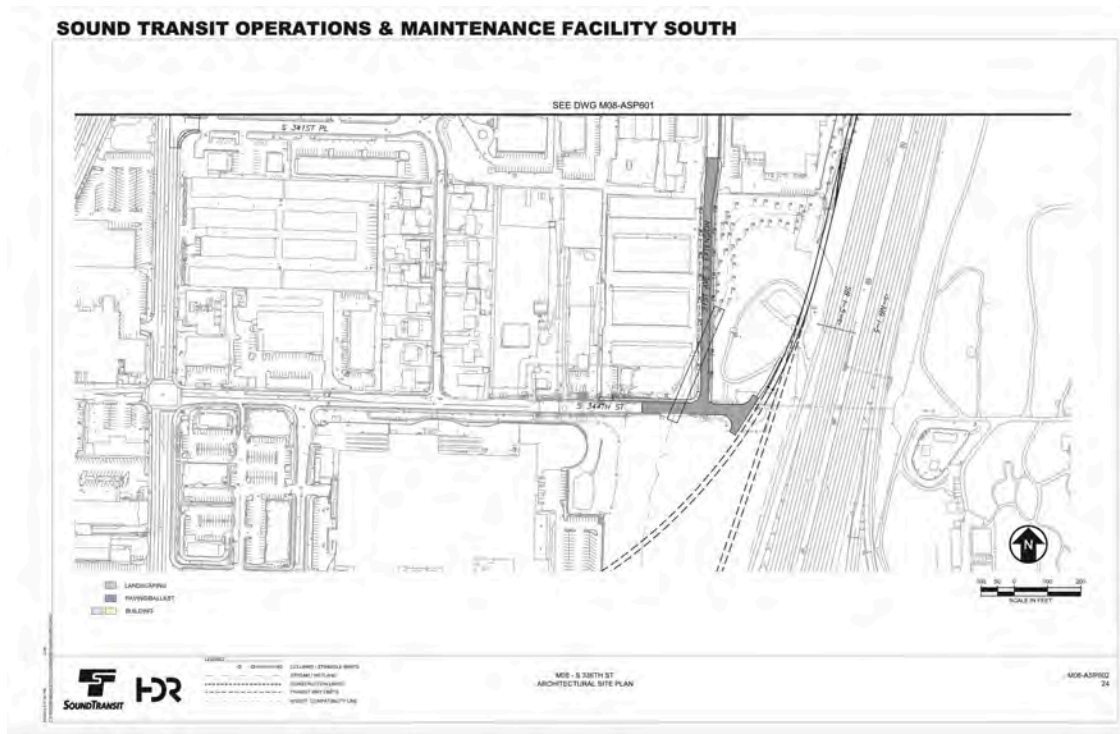
The GarageTown Federal Way Condominium Association is responsible for maintenance of the GarageTown Federal Way property at 2010 S 344th St in Federal Way. In this capacity we have the following comments on the NEPA Draft/ Supplemental SEPA Draft:

1) The GarageTown Federal Way Condominium Association continues to advocate for the Midway Landfill site, Full Excavation option. The technical and cost issues, clearly summarized in the Draft, are within the capabilities of Sound Transit to overcome, and are worth undertaking to avoid the substantial impact to private property of the other two alternatives.

The Preferred Alternative is the better choice of the remaining alternatives.

The GarageTown Federal Way Condominium Association remains **strongly opposed to the S 344th alternative** - it has the most impact on private property and appears to be the least desirable of the options from a design standpoint.

2) The revised design of the Preferred Alternative indicates an extension of 21st Ave S, connecting S 341st Pl with S344th St.



Preferred Alternative - proposed 21st Ave S extension

The GarageTown Federal Way Condominium Association has a number of concerns about this planned extension:

A. intrusion onto property outside of easement

The existing fence line at the eastern GarageTown Federal Way property border is located approximately 16 feet west of the actual property border, following an easement on the property for future road construction. The GarageTown Federal Way Condominium Association **strongly opposes** incursion onto the property outside of the existing easement. Such incursion would necessarily reduce the width of the eastern driveway of the property. The eastern driveway at its current width is essential for operations to allow for circulation of large vehicles, including tractor-trailers and fire engines. Changing this access pattern would be extremely detrimental to the use of GarageTown Federal by its occupants.

B. fire road access too near the intersection of 21st Ave S and S 344th

The SE corner of the property supports an emergency secondary access to the property for fire equipment. The driveway for this entrance currently terminates at S 344th St, immediately adjacent to the proposed new intersection. This may present a concern to the City of Federal Way in that it would be too close to the proposed intersection as designed.

As an alternative, the intersection could be designed as a curve connecting the two streets, with the fire access in the approximate center of the curve. Such a design would necessarily intrude on the SE corner of the GarageTown Federal Way property corner. This corner is not vital to operations at GarageTown Federal Way, such that the GarageTown Federal Way Condominium is **not opposed** to routing the 21st Ave S extension in a curve over the SE property corner.

A secondary emergency property access gate is located at the NE property corner. Although currently unused, this gate could be re-purposed for an emergency fire entrance if the SE corner entrance is deemed to be unusable from the new street extension. The NE corner is very near the elevation of the existing road to the north, and would require little modification to serve as a secondary emergency entrance. The GarageTown Federal Way Condominium Association is **not opposed** to such a modification, should it become necessary.

Locating other property entrances at the eastern property border is undesirable due to the likely change in elevation from the existing property driveway and the proposed new 21st Ave S extension, which will be several feet below.

C. retention of cul-de-sac - unnecessary and undesirable

The proposed design shows that the cul-de-sac at the eastern terminus of S 344th St would be retained, although redesigned. Such a turn-around would no longer be necessary since vehicles could exit through the new 21st Ave S extension rather than having to execute a u-turn as they do now. In addition, this isolated cul-de-sac is well-known to the Federal Way Police as a site for illicit activity, illegal dumping, and vagrancy. Removing this nuisance would be a net benefit to the area, and the Garage Town Federal Way Condominium Association **strongly advocates** removing this cul-de-sac should the 21st Ave S extension be constructed.

3) Proposed revisions to the path of the east fork of Hylebos Creek in the S 344th St Alternative impose significant risk to the GarageTown Federal Way property. As proposed in Appendix C, page 15, the existing culvert will be replaced with a fish-passable structure.



Preferred Alternative - Hylebos Creek plan

Page G3-81 | Appendix G3: Ecosystem Resources Technical Report

“...the stream would be conveyed under the 21st Avenue S extension and S 344th Street in a new structure that would replace the existing, approximately 315-foot-long culvert. “

The GarageTown Federal Way Condominium Association is **strongly opposed** to this feature. The culvert passes through the GarageTown property near the SE corner of a concrete building. The culvert is buried approximately 15 feet, requiring substantial excavation on the property, imposing risk of damage to the adjacent building through settling or vibration. As an alternative, the creek could be re-routed to the east of the intersection with the new 21st Ave S extension and S 344th St. Such a re-route would remove the requirement to excavate the existing culvert and would benefit the stream

hydraulics through additional daylighting of the stream path through the area. This option is suggested in the same appendix as part of the S344th Alternative:

Page G3-83 | Appendix G3: Ecosystem Resources Technical Report

“...approximately 420 linear feet of East Fork Hylebos Tributary immediately north of S 344th Street would be removed from an existing culvert and restored to approximately 570 linear feet of surface-flowing channel. Daylighting this segment would increase the amount of functioning aquatic and riparian habitat available in the stream system.”

The GarageTown Federal Condominium Association **strongly advocates** consideration of this design change since it both benefits the stream and removes a substantial risk to the GarageTown Federal Way property.

The GarageTown Federal Way Condominium Association respectfully requests that this information be considered when making decisions regarding the location of OMF South so that the significant impact of those decisions on affected property owners can be properly evaluated.

Sincerely yours,

Edward Miller

President, GarageTown Federal Way Condominium Association

GarageTown Federal Way Condominium Association (Communication ID 539132)		
Comment ID	Comment Text	Response
1	1. The GarageTown Federal Way Condominium Association continues to advocate for the Midway Landfill site, Full Excavation option. The technical and cost issues, clearly summarized in the Draft, are within the capabilities of Sound Transit to overcome, and are worth undertaking to avoid the substantial impact to private property of the other two alternatives.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	The Preferred Alternative is the better choice of the remaining alternatives.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
3	The GarageTown Federal Way Condominium Association remains strongly opposed to the S 344th alternative - it has the most impact on private property and appears to be the least desirable of the options from a design standpoint.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
4	<p>2. The revised design of the Preferred Alternative indicates an extension of 21st Ave S, connecting S 341st Pl with S344th St.</p> <p>The GarageTown Federal Way Condominium Association has a number of concerns about this planned extension:</p> <p>A. intrusion onto property outside of easement</p> <p>The existing fence line at the eastern GarageTown Federal Way property border is located approximately 16 feet west of the actual property border, following an easement on the property for future road construction. The GarageTown Federal Way Condominium Association strongly opposes incursion onto the property outside of the existing easement. Such incursion would necessarily reduce the width of the eastern driveway of the property. The eastern driveway at its current width is essential for operations to allow for circulation of large vehicles, including tractor/trailers and fire engines. Changing this access pattern would be extremely detrimental to the use of GarageTown Federal by its occupants.</p> <p>B. fire road access too near the intersection of 21st Ave S and S 344th</p> <p>The SE corner of the property supports an emergency secondary access to the property for fire equipment. The driveway for this entrance currently terminates at S 344th St, immediately adjacent to the proposed new intersection. This may present a concern to the City of Federal Way in that it would be too close to the proposed intersection as designed.</p> <p>As an alternative, the intersection could be designed as a curve connecting the two streets, with the fire access in the approximate center of the curve. Such a design would necessarily intrude on the SE corner of the GarageTown Federal Way property corner. This corner is not vital to operations at GarageTown Federal Way, such that the GarageTown Federal Way Condominium is not opposed to routing the 21st Ave S extension in a curve over the SE property corner.</p>	The extension of 21st Avenue S to S 344th Street is proposed to meet City of Federal Way code requirements, which do not allow a cul-de-sac in this location. Sound Transit would continue to work with Federal Way and affected property owners on the design of the 21st Avenue S extension.

GarageTown Federal Way Condominium Association (Communication ID 539132)		
Comment ID	Comment Text	Response
	<p>A secondary emergency property access gate is located at the NE property corner. Although currently unused, this gate could be re-purposed for an emergency fire entrance if the SE corner entrance is deemed to be unusable from the new street extension. The NE corner is very near the elevation of the existing road to the north, and would require little modification to serve as a secondary emergency entrance. The GarageTown Federal Way Condominium Association is not opposed to such a modification, should it become necessary.</p> <p>Locating other property entrances at the eastern property border is undesirable due to the likely change in elevation from the existing property driveway and the proposed new 21st Ave S extension, which will be several feet below.</p> <p>C. retention of cul-de-sac - unnecessary and undesirable</p> <p>The proposed design shows that the cul-de-sac at the eastern terminus of S 544th St would be retained, although redesigned. Such a turn-around would no longer be necessary since vehicles could exit through the new 21st Ave S extension rather than having to execute a U-turn as they do now. In addition, this isolated cul-de-sac is well-known to the Federal Way Police as a site for illicit activity, illegal dumping, and vagrancy. Removing this nuisance would be a net benefit to the area, and the Garage Town Federal Way Condominium Association strongly advocates removing this cul-de-sac should the 21st Ave S extension be constructed.</p>	
5	<p>3. Proposed revisions to the path of the east fork of Hylebos Creek in the S 344th St Alternative impose significant risk to the GarageTown Federal Way property. As proposed in Appendix C, page 15, the existing culvert will be replaced with a fish-passable structure.</p> <p>“ the stream would be conveyed under the 21st Avenue S extension and S 344th Street in a new structure that would replace the existing, approximately 315-foot-long culvert. “</p> <p>The GarageTown Federal Way Condominium Association is strongly opposed to this feature. The culvert passes through the GarageTown property near the SE corner of a concrete building. The culvert is buried approximately 15 feet, requiring substantial excavation on the property, imposing risk of damage to the adjacent building through settling or vibration. As an alternative, the creek could be re-routed to the east of the intersection with the new 21st Ave S extension and S 344th St. Such a re-route would remove the requirement to excavate the existing culvert and would benefit the stream hydraulics through additional daylighting of the stream path through the area. This option is suggested in the same appendix as part of the S344th Alternative:</p> <p>Page G3-83 Appendix G3: Ecosystem Resources Technical Report</p> <p>“ approximately 420 linear feet of East Fork Hylebos Tributary immediately north of S 344th Street would be removed from an existing culvert and restored to</p>	<p>FTA and Sound Transit acknowledge the Association's concerns regarding potential property damage associated with removal of the existing culvert. Final design of the replacement fish-passable structure would be done with the goal of avoiding and minimizing alterations to surrounding properties. If the Preferred Alternative is selected as the project to be built, Sound Transit will continue to coordinate with GarageTown on the potential effects to the property as the design advances.</p>

GarageTown Federal Way Condominium Association (Communication ID 539132)		
Comment ID	Comment Text	Response
	<p>approximately 570 linear feet of surface-flowing channel. Daylighting this segment would increase the amount of functioning aquatic and riparian habitat available in the stream system."</p> <p>The GarageTown Federal Condominium Association strongly advocates consideration of this design change since it both benefits the stream and removes a substantial risk to the GarageTown Federal Way property.</p>	

OMF SITES ~ FEDERAL WAY

Roger Flygare [REDACTED]

Mon 11/6/2023 3:50 PM

To:OMF South <OMFsouth@soundtransit.org>

Cc:Roger Flygare <rgflygare@gmail.com>

You don't often get email from [REDACTED]. [Learn why this is important](#)

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

November 6, 2023

To: OMF South @ Erin Green
Sound Transit
401 Jackson Street
Seattle, WA 98104

I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way. The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids.

The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.

We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end, resulting in more considerable business and traffic impacts.

Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is outrageous to expect that our city is to accommodate all of Sound Transits needs, especially one that is industrialized and goes against city developmental policies.

These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of housing, community facilities, daycares would further exploit our community members and fortify their economic struggle.

To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are current bus line options already in place.

There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way.

This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellanos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.

Assumptions are being made by Sound Transit that our city's Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted.

There is a distinction between "working with the city" and expecting the city to disregard their policies. The Transportation Technical report needs to be corrected and clarified on numerous issues.

This includes eliminating 20th Ave. S., as this is the only access for emergency vehicles. Any delay in response time can have serious negative health impacts to our community members.

The suggested solution to bulldoze a road through a critical wetland is also not an acceptable option. Mitigations took place in 1994, our water district operates within this area, it serves as an aquifer recharge area and is home to numerous wildlife species.

The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, "we have commitments to stormwater management, site access, mitigation, and recreational areas." A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife. The open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.

Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated portions of the East Branch of the Hylebos, a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.

The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site. If the Federal government or the state would be invited to assist in the funding, according to public conversations posted, between Sound Transit planners and engineers. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.

I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed too quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.

Respectfully submitted,

Roger Flygare
Federal Way Resident

The content of this email is confidential and intended for the recipient(s) specified in this email. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

Roger Flygare (Communications ID 539987)		
Comment ID	Comment Text	Response
1	I am writing to you today in full opposition to both potential OMF sites (S. 336th St. & S. 344th St.) here in the city of Federal Way.	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
2	<p>The Puyallup Tribe has emphatically stated that pipelines and underground drainage conveyances offer NO means of water treatment or ground water recharge whatsoever and therefore are viewed as incompatible with fish recovery. Regardless of whether fish travel up to this area, it is the microbenthic vertebrae (food) that must travel via rocks, trees, and water to reach the lower reaches of the Hylebos East branch that must sustain healthy salmonoids.</p> <p>The tribes have spent tens of millions of dollars on property acquisitions, restoration plans, habitat restoration, stream enhancements and contaminant cleanup sites on lands that sit below the S. 336th St. and S. 344th St. sites. Loss of water treatment opportunities and recharge are NOT an acceptable option for the tribe. As stewards of these lands since time memorial, I support the Puyallup Tribes Sovereignty for preservation.</p>	Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS. Final EIS Section 3.10, Ecosystem Resources, and Appendix G3, Ecosystems Resources Technical Report, further detail the impacts and avoidance, minimization, and mitigation measures concerning Hylebos Creek.
3	<p>We are a small city of only 22 Square miles. Sound Transit has recently taken over and built their transit light rail station at our cities core at S. 320th. Expected build out of another transit transfer station and parking garage is planned for our south end, resulting in more considerable business and traffic impacts.</p> <p>Now the citizens of Federal Way are expected to sacrifice not one but two possible locations in our midtown. It is outrageous to expect that our city is to accommodate all of Sound Transits needs, especially one that is industrialized and goes against city developmental policies.</p>	Please see the response to Common Comment 4 in Table L.1-1, Responses to Common Comments, in the Final EIS.
4	<p>These two sites were studied by Sound Transit as having a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Displacement of housing, community facilities, daycares would further exploit our community members and fortify their economic struggle.</p> <p>To assume that an industrial build such as the proposed 67-acre OMF facility would offset the impacts to the minority population because they would benefit from riding the train is absurd. They would still have to travel outside of their area to utilize a transfer station. Causing them time and money. There are current bus line options already in place.</p>	Sound Transit and FTA have updated Final EIS Appendix E, Environmental Justice Assessment, and Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods, to discuss in greater detail the potential impacts to minority and low-income populations as well as project mitigation and benefits. After consideration of the additional analysis, FTA maintains the preliminary determination that OMF South would not result in disproportionately adverse effects on environmental justice populations.

Roger Flygare (Communications ID 539987)		
Comment ID	Comment Text	Response
5	<p>There simply is no M2 or M3 (heavy industries that generate noise, traffic, or pollutants) zoning here in the city of Federal Way.</p> <p>This unseemingly and inconsistent development would have devastating/catastrophic effects on businesses like Ellenos Yogurt, N.W. Equipment Sales/Rentals, Garage Town, Voice of Hope Church, Family Life Community Church, Christian Faith Church and associated schools, Redwood Church of God, and Tabernacle Temple of Praise Church.</p> <p>Assumptions are being made by Sound Transit that our city's Comprehensive Plan policies of converting our only light industrial zone in Federal Way (S. 344th St.), vacating public roads and modifications of development standards will be permitted.</p> <p>There is a distinction between "working with the city" and expecting the city to disregard their policies.</p>	<p>An OMF would not have the same effects as a heavy industrial facility. The potential impacts of OMF South for the topics mentioned in the comment are described in Section 3.2, Transportation, and Section 3.9, Noise and Vibration, of the Final EIS.</p>
6	<p>The Transportation Technical report needs to be corrected and clarified on numerous issues.</p> <p>This includes eliminating 20th Ave. S., as this is the only access for emergency vehicles. Any delay in response time can have serious negative health impacts to our community members.</p>	<p>Appendix G1, Transportation Technical Analysis, and Section 3.2, Transportation, of the Final EIS have been updated to correct errors that were identified in the public comments. Potential impacts to emergency vehicle response times under the Preferred and South 344th Street alternatives are discussed in Section 3.14, Public Services.</p>
7	<p>The suggested solution to bulldoze a road through a critical wetland is also not an acceptable option. Mitigations took place in 1994, our water district operates within this area, it serves as an aquifer recharge area and is home to numerous wildlife species.</p> <p>The S. 336th St. option runs with a never-ending Concomitant Agreement, that is not negotiable, and as Christian Faith owners stated in their 2021 letter, "we have commitments to stormwater management, site access, mitigation, and recreational areas." A reminder that this land is a part of the iconic Weyerhaeuser Campus, in which visual impacts were NOT adequately addressed in previous Draft statements. The Christian Faith land WAS already mitigated in 1994 and it was the citizens who fought for four long years to preserve the functionality of the Hylebos Creek, surrounding tributaries and wetlands. It should not be allowed to be mitigated again. This is a Corporate Park zoning with highly sensitive areas, that do not warrant a Heavy Industrial Equipment zoning. Noise and vibration impacts will be considerably undesirable and unhealthy for residents and wildlife. The open spaces, creek and native forests provide food, water, and shelter as it is a part of the International Flight Pathway. 150 migrating species depend on these resources.</p>	<p>Please see the response to Common Comment 3 in Table L.1-1, Responses to Common Comments, in the Final EIS.</p>

Roger Flygare (Communications ID 539987)		
Comment ID	Comment Text	Response
8	Sound Transit, King County and the city of Federal Way must consider the cumulative impacts of future developments within the Hylebos Watershed. Hylebos Watershed and Lower Puget Sound Plan must be included and thoughtfully considered. Numerous large developments such as the two warehouses built recently on the Weyerhaeuser Campus has already negated portions of the East Branch of the Hylebos, a head water tributary, that fed not only the Hylebos, but the Duwamish/Green River Watersheds. Any further demolition of the Hylebos East Branch Creek will surely lead to its demise.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 8.
9	The cities of Kent, Des Moines and Auburn are in favor of the Midway landfill as The Preferred OMF site. They stand in opposition with the city of Federal Way for the construction of the OMF South at either of these locations. The landfill is a most doable site. if the Federal government or the state would be invited to assist in the funding, according to public conversations posted, between Sound Transit planners and engineers. Sound Transit should exhaust every available option before it forever displaces our citizens, businesses, environment, aquifer, and high quality of life here in Federal Way.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 9.
10	I urge Sound Transit to reconsider the two previous site options in Fife, as the zoning would permit a heavy industrial equipment build. These two options were dismissed to quickly, due to a lag of a mere 22 seconds in train journey travel in regards to reaching its set destinations. Surely this can be managed by the experts of Sound Transit, and should be a priority task moving forward.	Please see the response to Kerry Lesinski (Communications ID 539016) comment 10.