



Operations and Maintenance Facility South

**NEPA Draft / SEPA Supplemental Draft
Environmental Impact Statement**

Appendix E: Environmental Justice Assessment



September 2023

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Acronyms and Abbreviations

ACS	American Community Survey
ADA	Americans with Disabilities Act
Board	Sound Transit Board
BRT	bus rapid transit
COI	Community of Interest
Corps	U.S. Army Corps of Engineers
DAHP	Washington State Department of Archaeology and Historic Preservation
DNR	Washington State Department of Natural Resources
DOT	U. S. Department of Transportation
Ecology	Washington State Department of Ecology
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
FWPD	Federal Way Police Department
GIS	geographic information systems
HCT	high-capacity transit
I-5	Interstate 5
Metro	King County Metro Transit
NEPA	National Environmental Policy Act
NWSA	Northwest Seaport Alliance
OSPI	Washington State Office of Superintendent of Public Instruction
Port	Port of Tacoma
PSRC	Puget Sound Regional Council
ROD	Record of Decision
SEPA	State Environmental Policy Act
Sound Transit	Central Puget Sound Regional Transit Authority
SR	State Route
ST3	Sound Transit 3 Plan
TDLE	Tacoma Dome Link Extension
TOD	transit-oriented development
WISAARD	Washington Information System for Architectural & Archaeological Records Data
WSDOT	Washington State Department of Transportation

1 INTRODUCTION

The Central Puget Sound Regional Transit Authority (Sound Transit) proposes to construct an operations and maintenance facility in the South Corridor to support Sound Transit's Link light rail system expansion. Sound Transit is evaluating three alternatives for the Operations and Maintenance Facility South (OMF South) Project in its South Corridor service area: two in Federal Way and one in Kent. Both cities are located in King County, Washington.

This appendix of the OMF South Draft Environmental Impact Statement (EIS) documents the environmental justice analysis conducted for the No-Build and build alternatives for the OMF South project. The analysis defines and describes the minority and low-income populations present in the study area; describes the project effects on minority and low-income populations; identifies measures to avoid, minimize, or mitigate potential adverse effects; and makes a preliminary determination of whether the project has disproportionate and adverse effects on these populations. This appendix also summarizes the public outreach to minority and low-income populations within the project area.

1.1 Regulatory Framework

The environmental justice analysis was performed in compliance with:

- Presidential Executive Order (EO) 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (EO 12898), February 11, 1994
- U.S. Department of Transportation (DOT) Order on Environmental Justice, Department of Transportation Order 5610.2(a) – Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, 77FR 27534, May 10, 2012
- Circular FTA C-4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients, August 15, 2012

EO 12898, issued in 1994, provides that “each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionate and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.” The executive order addresses the importance of public participation in the review process. EO 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All, was recently enacted April 21, 2023. The new EO 14096 on environmental justice does not rescind EO 12898, which FTA implements through the current DOT 5610.B and FTA Circular 4703.1 until further guidance is available on the new EO on environmental justice.

The U.S. DOT issued DOT Order 5610.2(a), which establishes the procedures to use to comply with EO 12898, in order to avoid disproportionate and adverse effects on minority and low-income populations. The DOT order requires agencies to take two actions:

1. Explicitly consider human health and environmental effects related to transportation projects that may have disproportionate and adverse effects on minority or low-income populations.
2. Implement procedures to provide “meaningful opportunities for public involvement” by members of minority or low-income populations during project planning and development (DOT Order 5610.2(a), § 5(b)(1)).

The DOT order further provides that “In making determinations regarding disproportionate and adverse effects on minority and low-income populations, mitigation and enhancement measures that will be taken and all offsetting benefits to the affected minority and low-income populations may be taken into account, as well as the design, comparative impacts, and the relevant number of similar existing system elements in non-minority and non-low-income areas” (DOT Order 5610.2(a), § 8(b)). The following definitions are from the DOT order for disproportionate and adverse effects, minority persons, and low-income persons:

- Disproportionate and adverse effect on minority and low-income populations means an adverse effect that is predominately borne by a minority population and/or a low-income population or that would be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that would be suffered by the non-minority population and/or non-low-income population (DOT Order 5610.2(a), Appendix § 1(g)).
- A minority is a person who meets the following criteria:
 - Black (a person having origins in any of the black racial groups of Africa).
 - Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race).
 - Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands).
 - American Indian or Alaskan Native (a person having origins in any of the original people of North America who maintains cultural identification through tribal affiliation or community recognition) (DOT Order 5610.2(a), Appendix § 1(c)).
- A low-income person is identified as a person whose median household income is less than or equal to two times the Federal Poverty Level — a local threshold that Sound Transit and other regional transit agencies have determined is appropriate for use in determining eligibility for reduced fare programs and reflects the increasingly high cost of living in the region. Those individuals considered low-income will include persons living below this threshold.

In addition to the relevant regulations considered for all environmental analyses, the following list of federal, state, and local regulations; executive orders; and plans and/or policies that guide the assessment of environmental justice effects are considered as part of this analysis:

- Title 49 of the Code of Federal Regulations Part 21 (49 CFR 21), Nondiscrimination in Federally Assisted Programs of the Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964.
- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Relocation Act; 42 USC 61). This act defines the federal regulations governing property acquisition and relocation for federally funded projects.
- Washington Department of Transportation Environmental Manual, Chapter 458, Social and Community Effects (WSDOT 2020).

2 METHODS AND APPROACH

The purpose of this analysis is to determine if the OMF South project would result in disproportionate and adverse effects on minority or low-income populations. The regulatory framework and definitions of these populations is included in Section 1.1 above. A disproportional adverse effect is one that:

1. is predominately borne by a minority population and/or a low-income population; or
2. will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the nonminority population and/or non-low-income population.

This analysis first describes the presence of minority and low-income populations for each of the build alternatives being considered as part of the project: 1) Preferred Alternative; 2) South 344th Street Alternative; and 3) Midway Landfill Alternative. It then describes the potential project effects to residents and to community facilities and social resources, and then determines if the project-level adverse impacts are disproportionately borne by low-income or minority communities. The analysis also includes a discussion of Sound Transit's engagement with minority and low-income populations in the public involvement process and means to avoid, minimize, or mitigate disproportionate and adverse effects.

2.1 Study Area

The study area for the environmental justice analysis encompasses the area approximately 0.5 mile from the project's potential construction limits for each of the build alternatives. While many of the other environmental topics consider smaller areas for assessing impacts, the 0.5-mile study area allows the project team to identify potentially affected environmental justice populations and resources that could be affected by the project.

2.2 Census Data

The environmental justice analysis is based on U.S. Census Bureau data reported at the census tract and block-group levels. A census tract is a small subdivision of an urban area used by the U.S. Census Bureau to identify population and housing statistics. Census blocks are subdivisions of census tracts and are the smallest geographical units for which the U.S. Census Bureau collects data. The boundaries of census blocks are generally streets or other notable physical features and often correspond to a city block. A census block group is a combination of census blocks, typically encompassing two to four city blocks, and is the smallest geographical unit for which yearly Census data is published.

Data reported for minority and low-income populations are compared to the cities surrounding the potential OMF South sites and to the Sound Transit District as a whole. The purpose of these comparisons is to understand how minority and low-income populations could be affected by the proposed project and how the distribution and concentration of those populations within the project study areas compares to the broader relevant geographic area where Sound Transit provides services.

3 AFFECTED ENVIRONMENT

The following section summarizes the population demographics and community facilities within the 0.5-mile study area for each OMF South build alternative. This section relies on publicly available data for the basis of the analysis; sources are noted where additional information from in-person contacts or other research is available. In the absence of supplemental data, the census data outlined below is assumed to be reflective of the study area.

3.1 Study Area Demographics

Demographic characteristics for minority and low-income populations within 0.5-mile of each build alternative were determined based on estimates from the U.S. Census Bureau's 2016–2020 5-year American Community Survey (ACS) data.

In addition to U.S. Census data, available datasets from the U.S. Environmental Protection Agency (EPA) EJSCREEN (Environmental Justice Screening and Mapping) and the Council on Environmental Quality's Climate and Economic Justice Screening tool were used to validate environmental justice characteristics in the study area. Further analysis into elementary school demographics was conducted based on Washington State Report Card data published by the Washington State Office of Superintendent of Public Instruction (OSPI).

Table E.3-1 summarizes the study area's demographic characteristics and compares them with those of the cities of Federal Way, Kent, and Des Moines, and the Sound Transit District as a whole. Table E.3-2 summarizes race and ethnicity characteristics, specifically, and compares them across the same study areas and jurisdictions.

Table E.3-1 Comparison of Demographic Characteristics

	Preferred Alternative	South 344th Street Alternative	Midway Landfill Alternative	Federal Way	Kent	Des Moines	Sound Transit District
Total Population ¹	8,452	9,482	10,712	96,812	130,038	31,983	3,189,953
Population under 5 years old	7%	7%	10%	7%	7%	6%	6%
Population over 64 years old	15%	15%	7%	14%	11%	18%	13%
Minority Population ²	66%	66%	68%	57%	58%	48%	42%
Low-Income Persons ³	40%	39%	44%	28%	30%	33%	21%
Households with Limited English Proficiency ⁴	18%	18%	15%	9%	10%	5%	6%
Median Household Income	\$51,029	\$51,580	\$61,212	\$68,672	\$73,891	\$70,268	\$96,803

Source: U.S. Census Bureau, American Community Survey (ACS) 2016–2020 5-Year Estimates

Notes:

- (1) Data represents the latest U.S. Census 5-year estimates based on 2016–2020 survey data. Survey data are not available at the census-block level; the data represent an estimate of minority and low-income persons in block groups within 0.5 mile of each project alternative.
- (2) Minority is defined as all but Non-Hispanic White Alone.
- (3) Low-income is defined as the percentage of a block group's population in households where the household income is less than or equal to twice the federal poverty level. This threshold is used by Sound Transit and other regional transit agencies to determine eligibility for reduced-fare programs and reflects the increasingly high cost of living in the region.
- (4) Limited English proficiency refers to anyone above the age of 5 in households who reported speaking English less than "very well," as classified by the U.S. Census Bureau.

Table E.3-2 Comparison of Race and Ethnicity Characteristics

	Preferred Alternative	South 344th Street Alternative	Midway Landfill Alternative	Federal Way	Kent	Des Moines	Sound Transit District
Hispanic or Latino	21%	21%	30%	17%	16%	20%	11%
Black or African American	18%	18%	13%	15%	12%	9%	7%
Asian	18%	17%	14%	14%	22%	16%	16%
American Indian and Native Alaskan	<1%	<1%	<1%	1%	<1%	3%	1%
Native Hawaiian/Pacific Islander	1%	2%	3%	2%	2%	4%	1%
Two or More Races and Other	7%	7%	8%	7%	7%	7%	7%

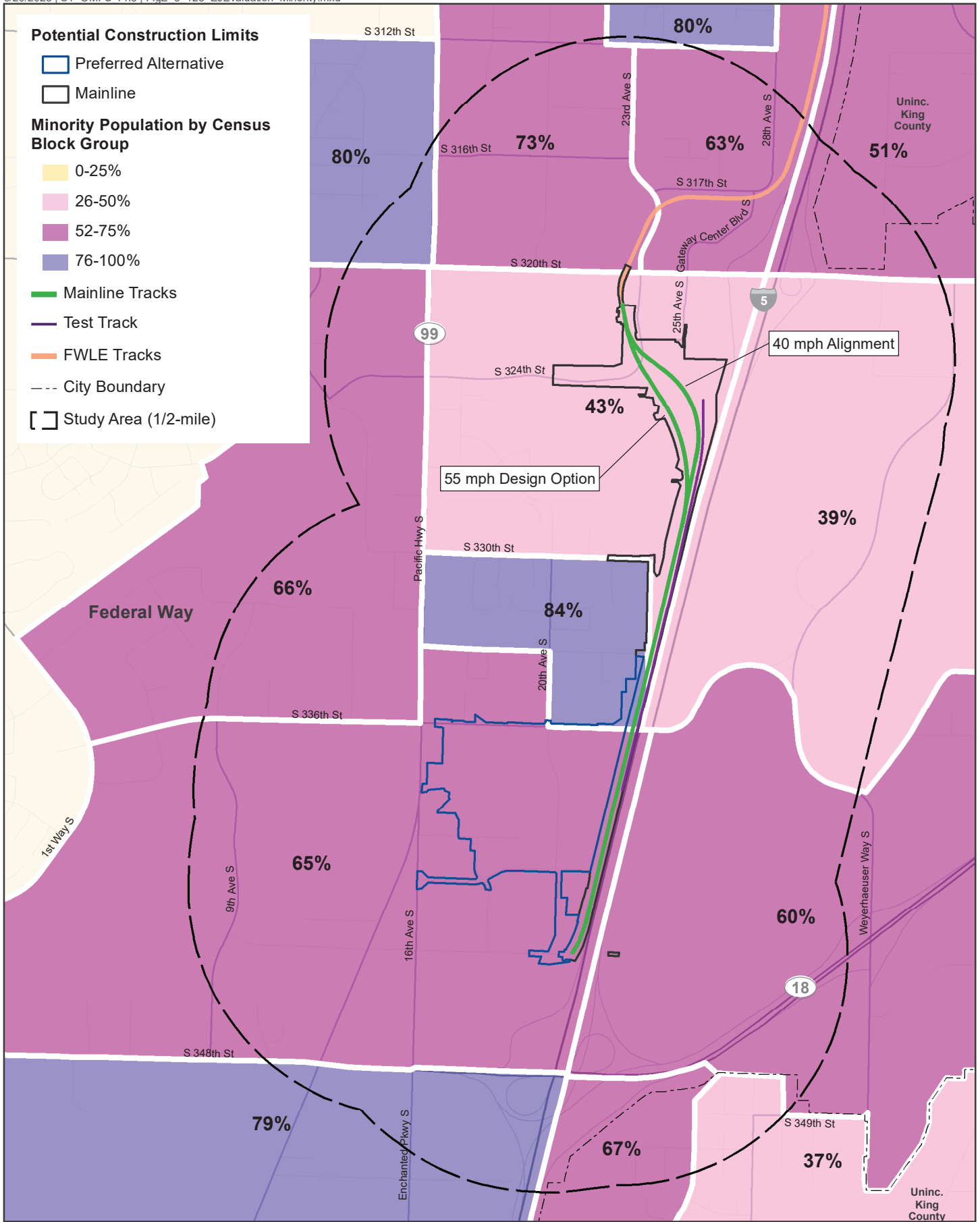
Source: U.S. Census Bureau, American Community Survey (ACS) 2016–2020 5-Year Estimates

In addition to Tables E.3-1 and E.3-2 above, geographic information system (GIS) maps were developed to visually illustrate demographic characteristics within each study area. Figures E.3-1 through E.3-3 depict minority populations for each build alternative, and Figures E.3-4 through E.3-6 show low-income populations at the block group level.

These data show that each study area for the build alternatives has relatively similar concentrations of low-income and minority populations. Minority persons account for approximately 66 to 68 percent of the total population residing within 0.5 mile of each build alternative, and low-income individuals account for approximately 39 to 44 percent of the population in the same area. Each build alternative study area has higher concentrations of low-income and minority persons than found within the surrounding jurisdictions (12 to 14 percent greater) or the Sound Transit District as a whole (18 to 23 percent greater).

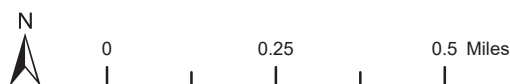
Given the similarity of the build and potential construction limits of the Preferred and South 344th Street alternatives, demographic characteristics between these alternatives are nearly identical. Both study areas have the same proportion of minority residents (66 percent) and relatively similar median household incomes, at approximately \$51,000. However, the Preferred Alternative has slightly higher proportions of low-income individuals than the South 344th Street Alternative.

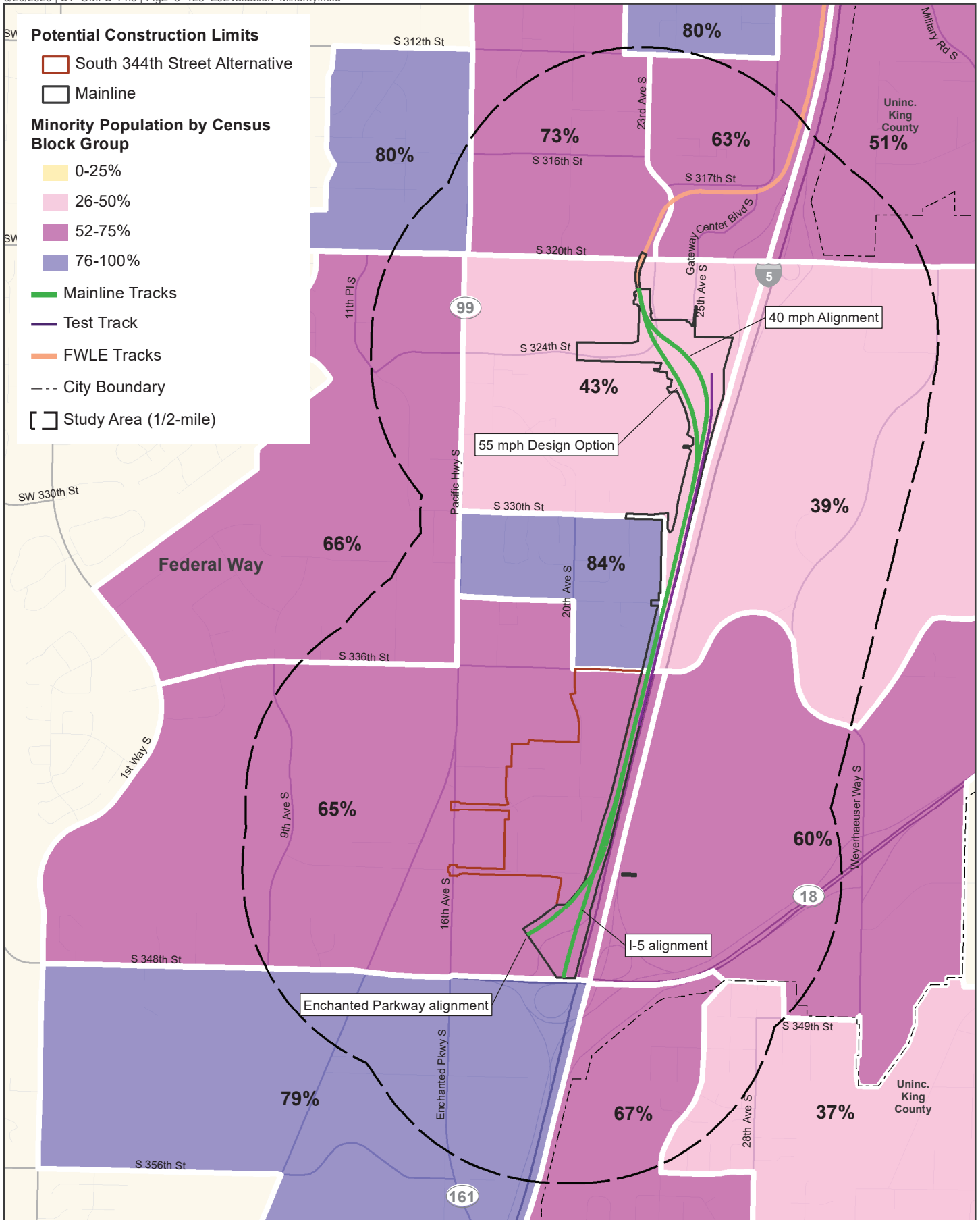
The Midway Landfill Alternative in Kent represents the highest proportion of low-income and minority residents as compared with the two alternatives located in Federal Way. The study area for the Midway Landfill Alternative represents approximately 10,700 residents. Of these residents, approximately 68 percent are reported as minorities and 44 percent are reported as low-income. The Midway Landfill Alternative also reported the highest median household income of the three alternatives at approximately \$61,000.



Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2023); U.S. Census Bureau ACS (2020).

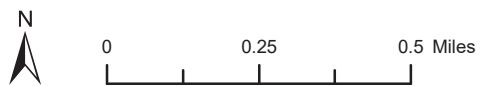
FIGURE E.3-1
Minority Populations
Preferred Alternative

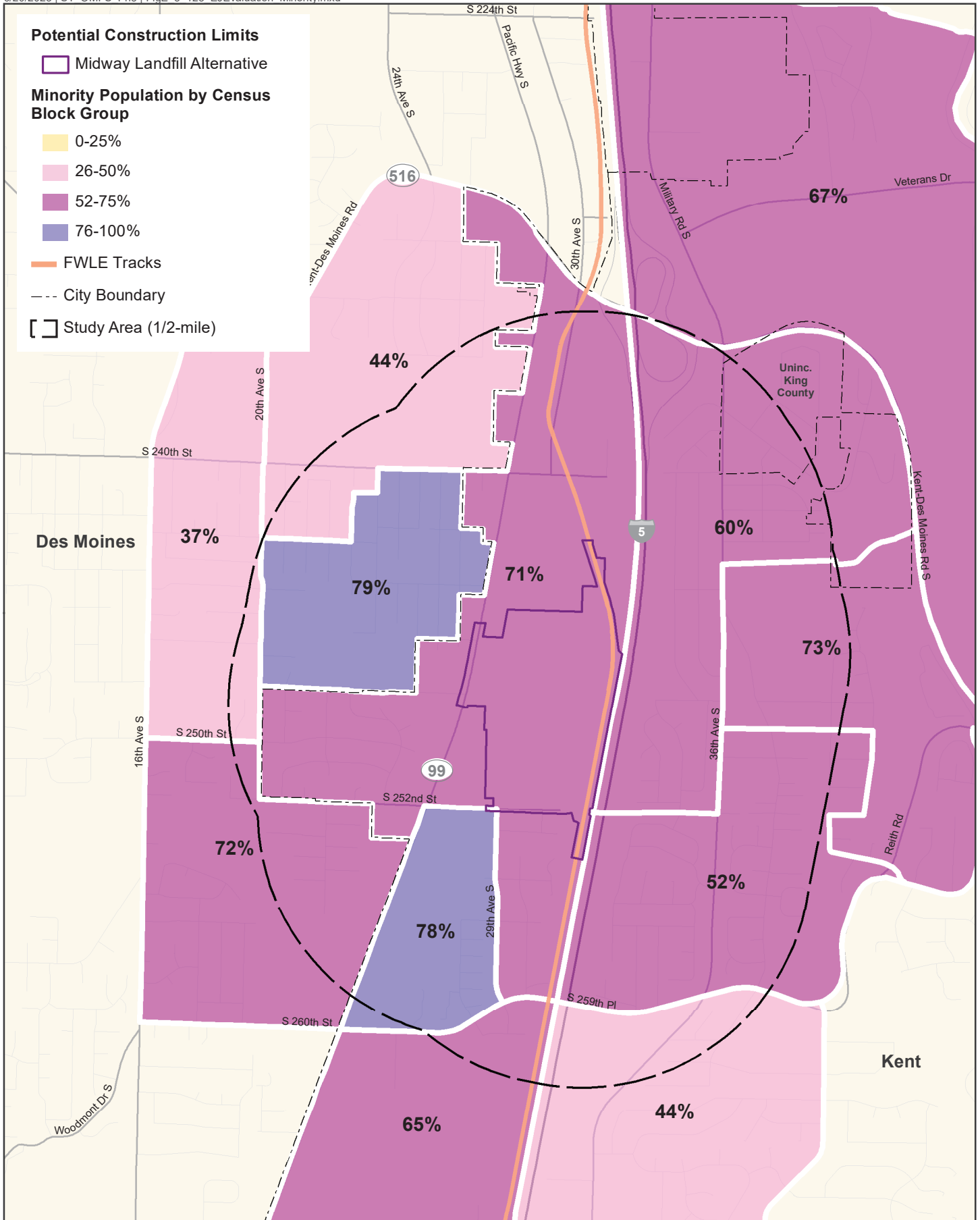




Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2023); U.S. Census Bureau ACS (2020).

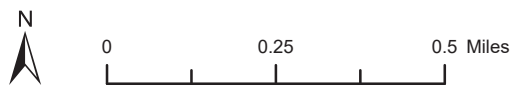
FIGURE E.3-2
 Minority Populations
 South 344th Street Alternative
 OMF South

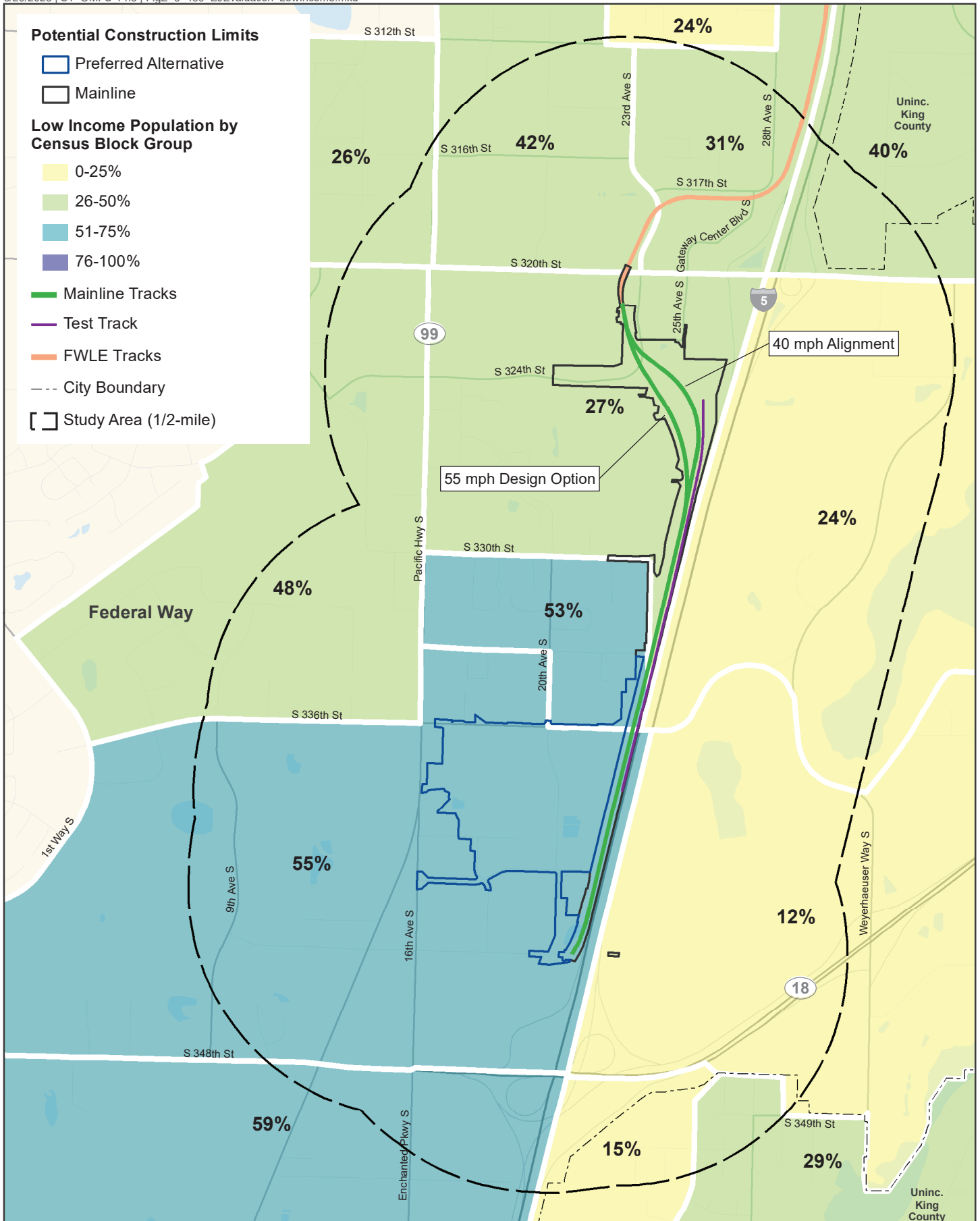




Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2023); U.S. Census Bureau ACS (2020).

FIGURE E.3-3
Minority Populations
Midway Landfill Alternative



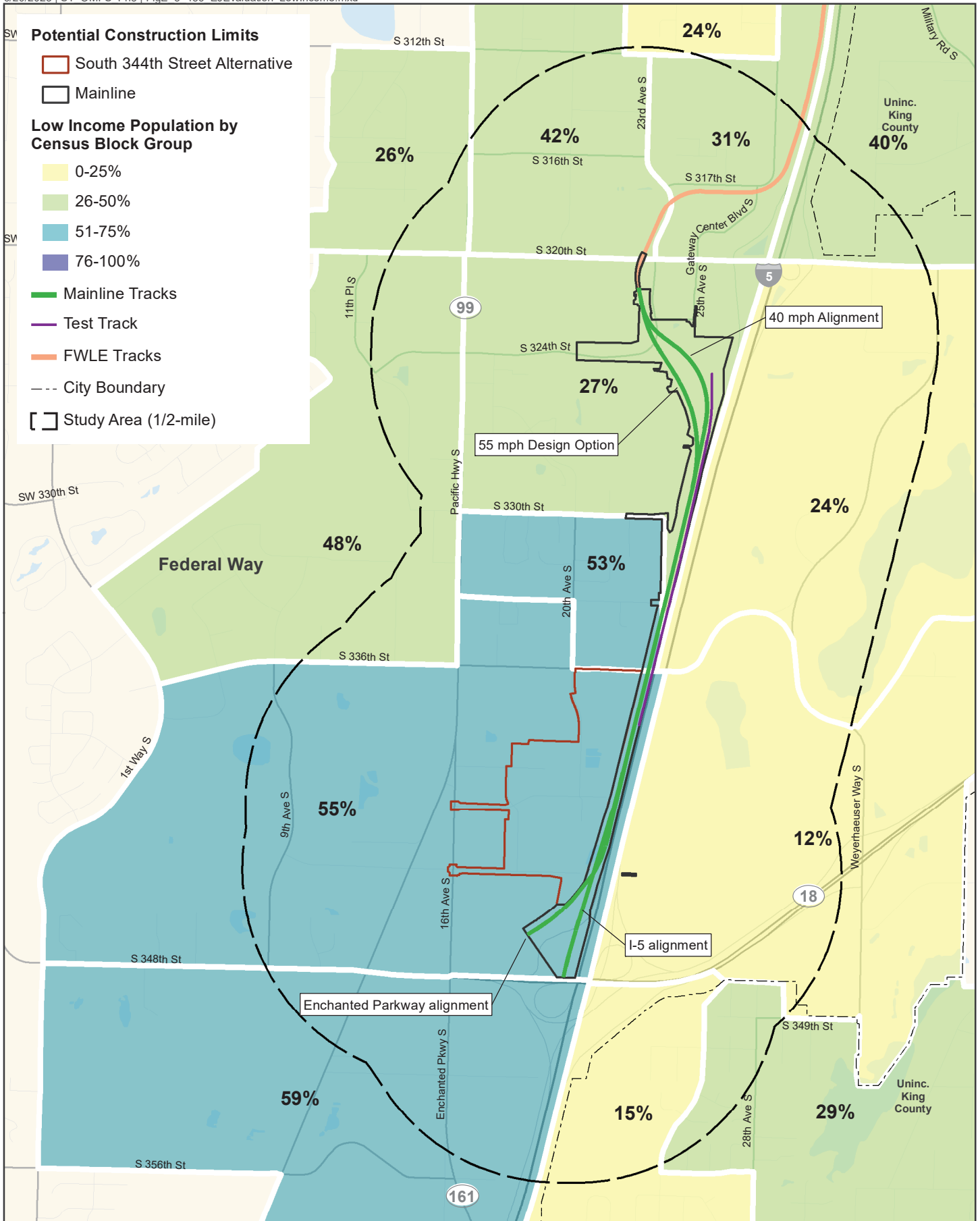


Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2023); U.S. Census Bureau ACS (2020).

FIGURE E.3-4
Low-Income Populations
Preferred Alternative

OMF South

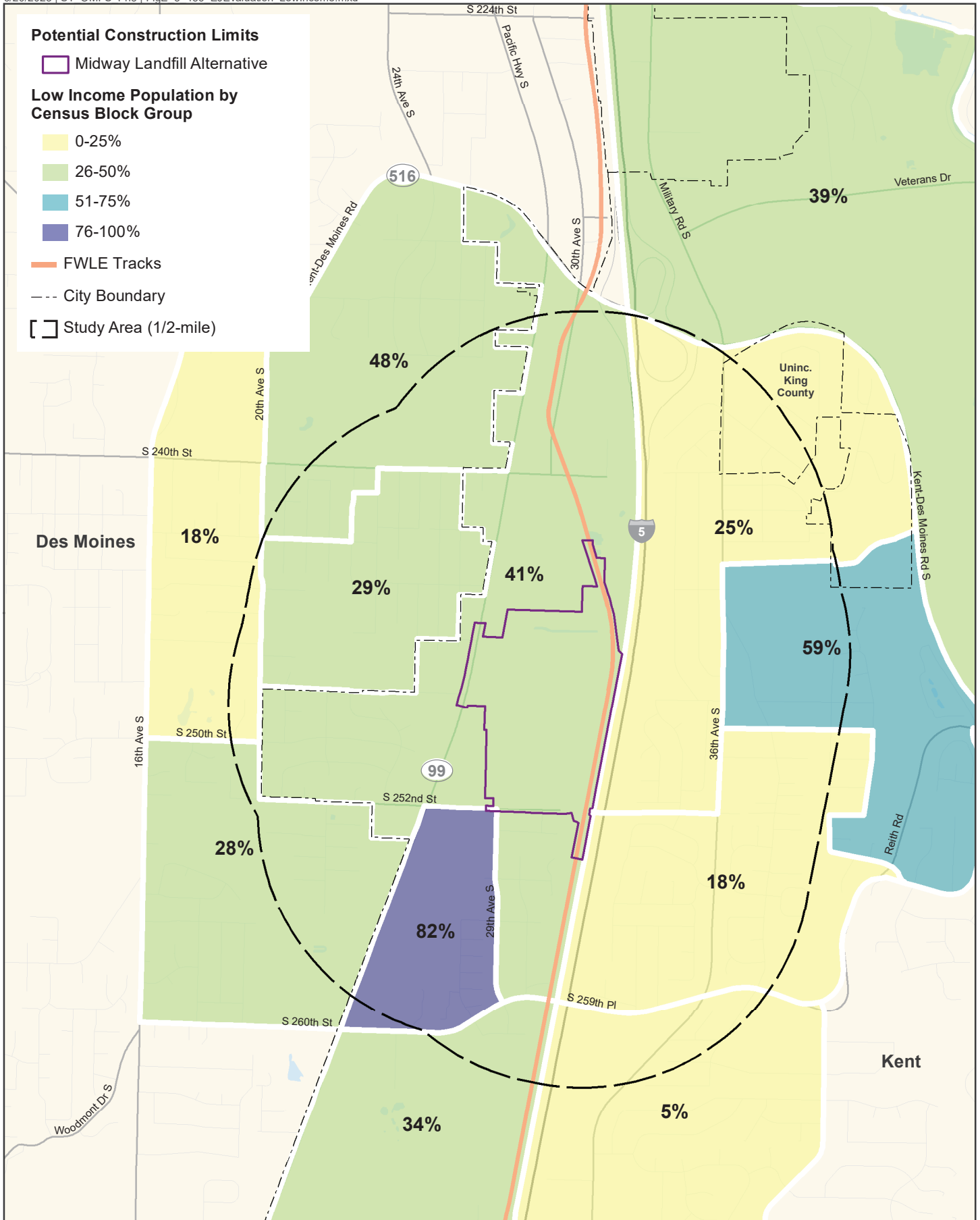




Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2023); U.S. Census Bureau ACS (2020).

FIGURE E.3-5
Low-Income Populations
South 344th Street Alternative





Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2023); U.S. Census Bureau ACS (2020).

FIGURE E.3-6
Low-Income Populations
Midway Landfill Alternative



ACS data report a five-year average for a small sample size, which potentially results in high margins of error. To supplement the ACS demographic data, additional demographic data from public elementary schools within the study area were reviewed. Demographic information from local public elementary schools is used because the attendance boundaries are smaller than public middle and high schools, and they tend to approximate the boundaries of the study area more precisely.

The Preferred and South 344th Street alternatives study area is entirely within the Federal Way School District, while the Midway Landfill Alternative study area is split between the Federal Way and Highline school districts. This assessment of elementary school demographic characteristics is based on Washington State Report Card data, published by OSPI. This assessment focuses on minority and low-income populations within the three elementary schools (Parkside Elementary, Sunnycrest Elementary, and Internet Academy) located within the study area. Table E.3-3 summarizes environmental justice characteristics for elementary schools within the study area for each build alternative.

Table E.3-3 Public Schools within Build Alternative Study Areas

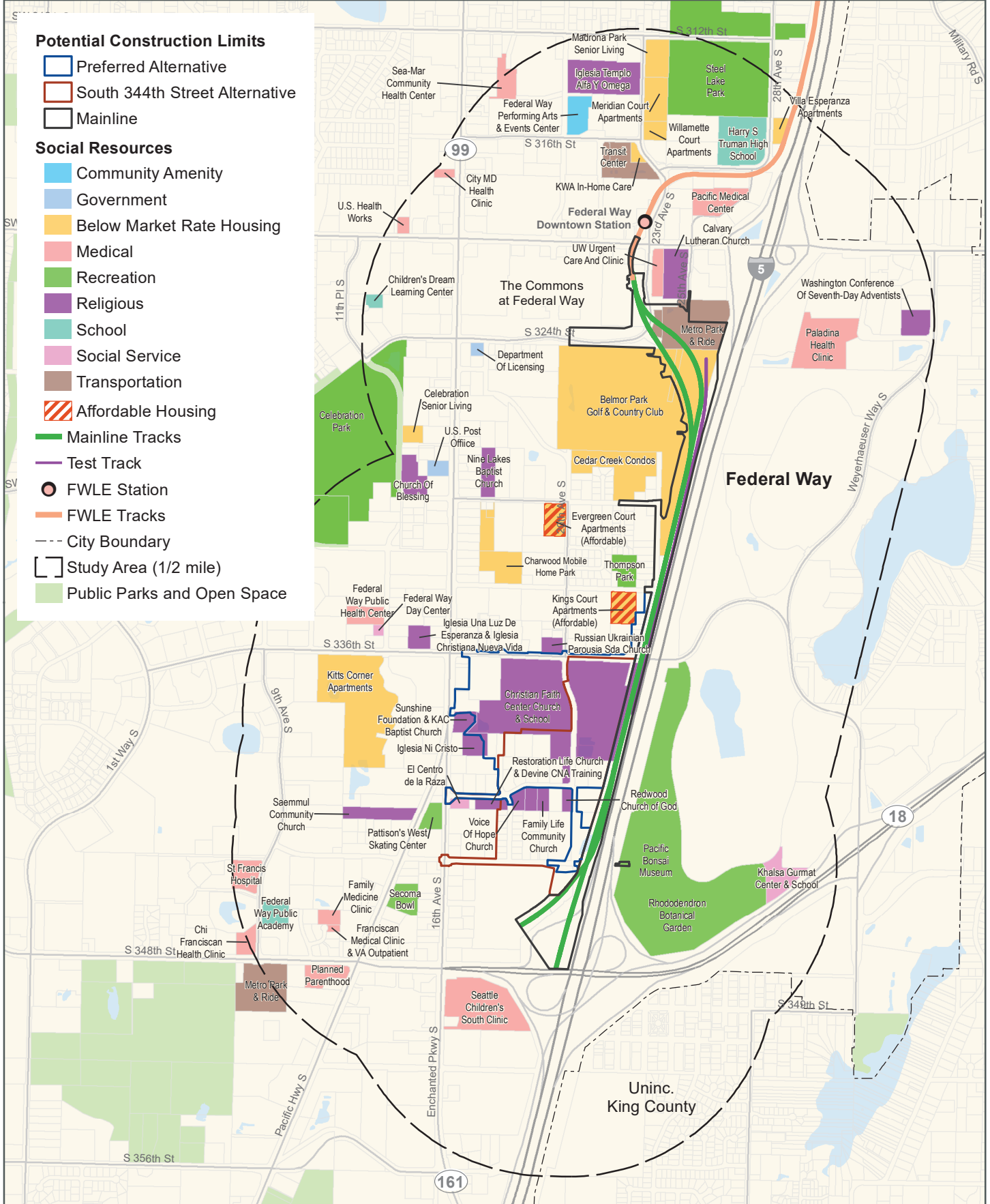
School Name	School District	Study Area	Total Students	Minority Population	Low-Income Population
Internet Academy	Federal Way School District	Preferred and South 344th Street Alternatives	895	633 (71%)	507 (57%)
Sunnycrest Elementary	Federal Way School District	Midway Landfill Alternative	505	434 (86%)	402 (80%)
Parkside Elementary	Highline School District	Midway Landfill Alternative	415	346 (83%)	310 (75%)
Total Students			1,815	1,413 (78%)	1,219 (67%)

Source: Washington State Office of Superintendent of Public Instruction (OSPI), 2021-2022. Washington State Report Card.

The Internet Academy is a public virtual school that is part of Federal Way Public Schools and is located within the study areas for the Preferred and South 344th Street alternatives. The proportions of low-income and minority populations for the Internet Academy are higher than the populations present within the Preferred and South 344th Street alternatives study area based on ACS information (Table E.3-1). Parkside Elementary and Sunnycrest Elementary are located within the Midway Landfill Alternative study area. Similarly, the proportions of low-income and minority populations at both elementary schools are higher than the proportions of low-income and minority populations within the Midway Landfill Alternative study area. This suggests that low-income and minority populations may be more prevalent in these areas than indicated by ACS information.

3.2 Community Facilities

For the purpose of this environmental justice assessment, community facilities are defined as facilities that likely provide substantial services or assistance to minority and low-income populations. Examples include social and human health services, homeless shelters, affordable housing developments, schools, and places of worship. The specific community facilities identified within each study area for each OMF South project alternative are summarized in the Social Resources, Community Facilities, and Neighborhoods section of the Draft EIS (Section 3.6). These resources are shown in Figures E.3-7 and E.3-8.



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

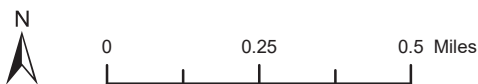
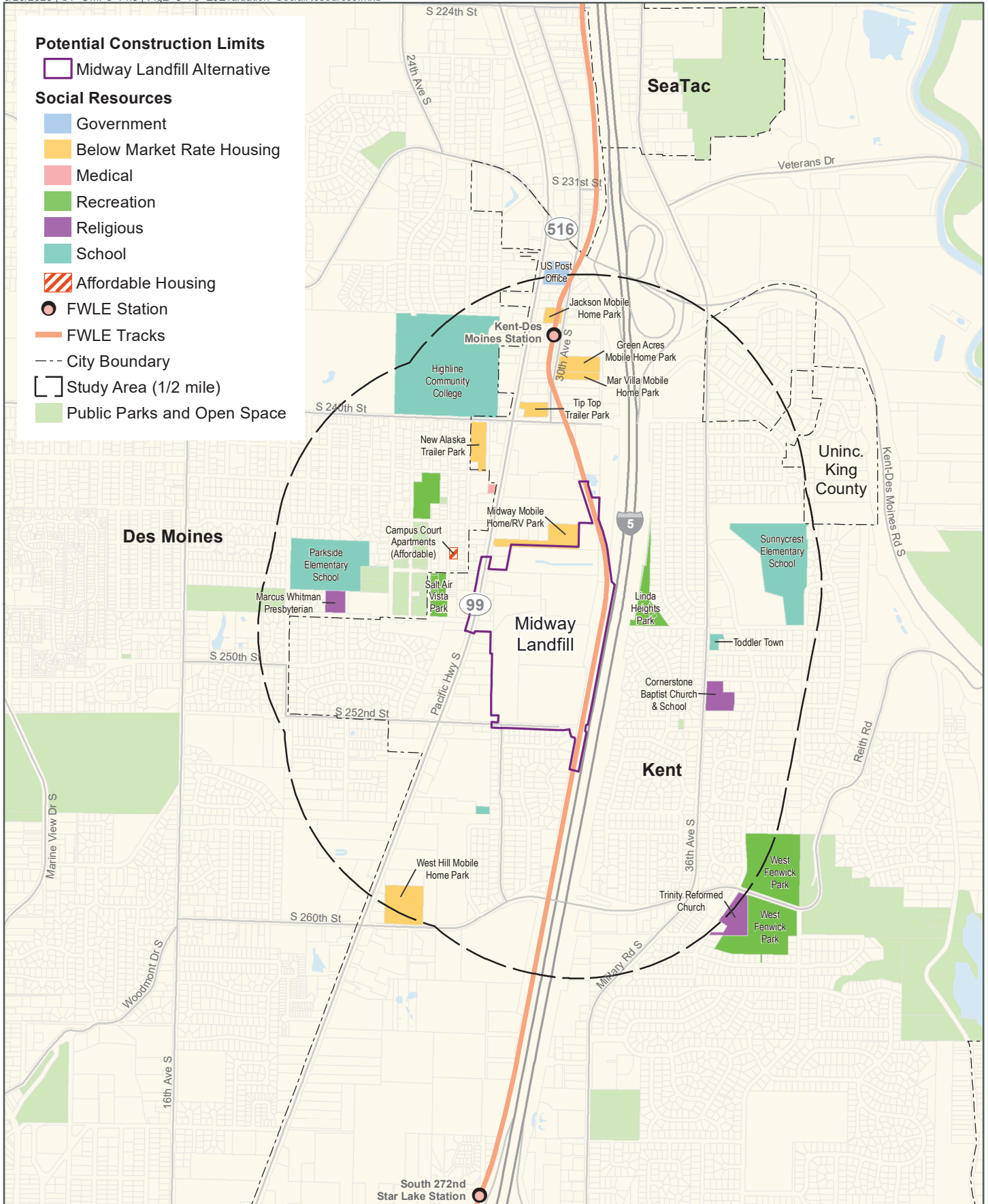


FIGURE E.3-7
Social Resources
Preferred and South 344th Street Alternatives
 OMF South



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

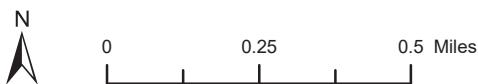


FIGURE E.3-8
Social Resources
Midway Landfill Alternative
OMF South

The Preferred and South 344th Street alternatives have substantially more community facilities within the study area than the Midway Landfill Alternative. Places of worship account for the majority of these facilities, including those that serve environmental justice populations. Schools and social/human services within each of these study areas also serve low-income and minority individuals.

Affordable housing was identified in the study area by reviewing information from the U.S. Department of Housing and Urban Development (HUD) and King County Housing Authority to identify properties and housing developments that provide subsidized housing or housing assistance for low-income and cost-burdened families. Affordable housing in the study area for the Preferred and 344th Street alternatives includes Kings Court and Evergreen Court Apartments (each with 30 two- to three-bedroom units open to families, seniors aged 55 and over, and disabled persons). Affordable housing in the study area for the Midway Landfill Alternative includes Campus Court Apartments (12 three-bedroom units open to families, seniors aged 55 and over, and disabled persons).

Additional nonsubsidized below-market-rate housing within the study area is available through private developments, such as apartment complexes, manufactured or mobile home developments, and RV parks. In the study area of the Preferred and South 344th Street alternatives, these nonsubsidized below-market-rate housing developments include Meridian Court Apartments, Willamette Court Apartments, Villa Esperanza Apartments, Belmor Park Golf & Country Club (Belmor), Charwood Mobile Home Park, Celebration Senior Living, and Kitts Corner Apartments. In the study area for the Midway Landfill Alternative, these nonsubsidized below-market-rate housing developments include Green Acres Mobile Home Park, Mar Villa Mobile Home Park, Jackson Mobile Home Park, Tip Top Trailer Park, New Alaska Trailer Park, Midway Mobile Home/RV Park, and West Hill Mobile Home Park. These social resources are depicted in Figures E.3-7 and E.3-8 above.

4 OUTREACH TO MINORITY AND LOW-INCOME POPULATIONS

Sound Transit conducted public outreach during the OMF South early scoping period and during the 2021 State Environmental Policy Act (SEPA) EIS process and will continue to perform targeted outreach throughout the project development process.

Sound Transit is required to provide meaningful opportunities for minority, low-income, and limited-English-proficiency groups to engage in the planning process by (1) the agency's community engagement procedures, (2) Executive Order 12898, U.S. Department of Transportation Order 5610.2(a), and (3) Federal Transit Administration Circular C 4703.1. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin. These directives make environmental justice a part of the decision-making process by identifying and addressing disproportionate and adverse human health and environmental effects of Sound Transit's programs, policies, and activities on minority and low-income populations.

Sound Transit conducted a preliminary demographic analysis to identify low-income, minority, and limited-English-proficiency populations. Based on this analysis, Sound Transit used the following strategies to engage these populations during the early scoping and scoping periods described below:

- Provided translated text on posters in Spanish, Korean, Vietnamese, Khmer, and Russian
- Provided translated meeting handouts in Spanish, Korean, Vietnamese, Khmer, and Russian
- Publicized events online and in print with language-specific media publications
- Provided translated text on the online open house web pages as well as the embedded Google Translate tool, which can translate text into over 100 languages

The following sections describe outreach efforts undertaken by Sound Transit to engage minority and low-income populations in more detail. The text also summarizes what Sound Transit heard from the community as they presented information about the developing project. As the project moves forward, Sound Transit will continue to engage community leaders, jurisdictions, and social service providers to seek input, assess outreach methods, and identify additional ways to reach low-income, minority, and limited-English-proficiency populations. A summary of all public outreach efforts is documented in Appendix B, Public Involvement and Agency Coordination.

4.1 Scoping Outreach

4.1.1 Early Scoping

In March 2018, Sound Transit published the Tacoma Dome Link Extension and Operations and Maintenance Facility South Early Scoping Information Report (Sound Transit 2018). Early scoping was intended to initiate the public conversation before the start of environmental studies and was conducted for both projects concurrently. The public comment period for early scoping was from April 2 to May 3, 2018, during which Sound Transit asked for public, tribal, and agency comments on the project's Purpose and Need statement, the TDLE "representative project alignment" and other alternative alignments, and alternative locations for an OMF in the south corridor.

To support early scoping, Sound Transit held three community open houses in Tacoma, Federal Way, and Fife. All public meeting locations were accessible to persons with disabilities. Alternative formats and translation services were available. In addition, an online open house

was available during the early scoping period to inform the public about the project and provide an opportunity to receive feedback using social media tools. All materials presented at the open house were posted on the online open house.

Sound Transit advertised the community open houses through a variety of methods, including:

- Postcards to over 52,160 households and businesses, including both owners and renters
- Online and print advertisements in 12 publications
- Posters at 150 locations in the corridor, including translated versions in Spanish, Korean, Vietnamese, Khmer, and Russian.
- Two news releases and five email update notices
- Social media posts
- Project website

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

In September 2018, Sound Transit conducted a series of stakeholder interviews, briefings, and tabling events around initial route and station concepts for TDLE. Although the OMF South project was not the focus of this outreach, Sound Transit presented information about OMF South and staff were available to answer questions and provide updates about the project.

During the outreach associated with early scoping, Sound Transit received approximately 2,160 email comments between late January and early February 2019, prior to the start of the scoping period. Major themes for pre-scoping comments included opposition to the S 240th St and SR 99 site, support for the Midway Landfill site, and concerns about business displacements and community impacts.

4.1.2 SEPA Scoping

When Sound Transit initiated the formal SEPA scoping process in early 2019, the OMF South environmental review had been split from the TDLE process. Unlike early scoping, which addressed both projects, the SEPA scoping process described here solely addressed the OMF South project.

During scoping, Sound Transit asked for comments on the proposed range of alternatives, the purpose and need for the project, environmental effects and benefits to be analyzed, probable significant adverse environmental impacts, potential mitigation measures, and license or other approvals that may be required. The comment period for scoping was from February 19 to April 1, 2019. This period exceeded the 30 days required under SEPA regulations and allowed additional time for public, agency, and Tribal comment.

During this period, two public scoping meetings were held to inform and obtain input from the community (one each in Federal Way and Kent). All public meeting locations were accessible to persons with disabilities. Alternative formats and translation services were available. Written comment forms and computers were available to access the online comment form at the public scoping meetings, along with a court reporter who took verbal comments. In addition to the online open house, comments could be submitted through emails to the project scoping inbox (OMFsouthscoping@soundtransit.org), regular mail, and leaving voicemails on a transcription line. Buell Realtime Reporting is the professional service used to transcribe the voicemails.

Sound Transit advertised the in-person scoping meetings and online open house through a variety of methods, including:

- Newsletters to over 74,000 households and businesses, including both owners and renters
- Online and print advertisements in 10 publications, including Korea Daily and Tu Decides to reach minority populations
- Posters at over 300 locations in the corridor
- Two news releases and four email update notices
- Social media posts
- Project website

During the outreach associated with SEPA scoping phase, Sound Transit asked for comments on:

- Site options and locations
- Social, economic, environmental, and transportation impacts
- The draft Purpose and Need statement

Sound Transit received approximately 730 emails, 480 online open house communications, 180 in-person communications, 50 voicemail messages, and 20 letters. Within these communications, approximately 2,500 comment statements were made. The scoping summary report contains a full record of these comments.

Comments related to low-income or minority populations included the following:

- The Federal Way Public Schools District asked that Sound Transit build the OMF South on one of the Midway Landfill sites to lessen community impacts, including those to residents, businesses, and faith-based organizations. The District noted that its students draw from a diverse community, with 60 percent qualifying for a free or reduced fee lunch and 20 percent who are learning English as a second language. The District asked Sound Transit to consider the impacts to these families in its analysis.
- About 185 comments mentioned employment, business, or economic-related impacts. Several comments expressed concern about business and job displacements, the relative cost of OMF site alternatives, and impacts to planned economic growth in the South Sound.
- About 40 comments were concerned with potential impacts to low-income populations and displacement of affordable housing by the OMF sites. Additionally, some potentially impacted businesses submitted comments concerning financial hardships that might occur if they were relocated.
- South 240th Street and SR 99 site: Commenters were concerned about impacts to nearby small businesses and affordable housing, including the Midway Mobile Home Park, and how their removal would affect low-income populations. About 150 comments concerned impacts to Highline College and its students, and about 20 comments involved the displacement of the mobile home park. This site alternative was not carried forward for further consideration.
- South 316th Street and Military Road site: Many commenters were concerned about residential displacements and neighborhood impacts. Comments mentioned zoning inconsistencies and noise concerns in a residential area, in addition to displacement of low-income or minority populations. This site alternative was not carried forward for further consideration.

In the fall of 2019, Sound Transit conducted several stakeholder interviews with representatives at social service agencies and community groups to inform future outreach efforts. This included proactive engagement with groups representing Environmental Justice populations, including the Federal Way Black Collective, the Voice of Hope Church, the Korean Baptist Church, and the Multi-Service center in Federal Way.

Sound Transit conducted focused OMF South outreach in November and December of 2019, which included a series of drop-in presentations and engagement sessions to provide the public with opportunities to learn more about the OMF South project. Sound Transit also launched an online open house for the project, which was available from November 13 through December 6, 2019. The online open house site included a landing page translated into Khmer, Korean, Russian, Spanish, and Vietnamese, with instruction on how to use Google Translate to navigate the site. The site also included content in each of these languages.

4.2 2021 SEPA Draft EIS Outreach

In conjunction with the release of the 2021 SEPA Draft EIS, Sound Transit hosted an online open house between March 5, 2021, and April 19, 2021. Information presented on the online open house website included project background and history, details about the environmental review process, analysis of the three OMF South build alternatives with maps and statistical comparisons, and the project timeline. The online open house was fully translated into Spanish, Korean, and Russian and included the Google Translate function so users could translate webpage text into additional languages. Users were able to submit a comment on the 2021 SEPA Draft EIS findings via a comment from on the online open house.

In addition to the online open house, Sound Transit hosted two online public hearings during the 45-day comment period. The hearings provided attendees the opportunity to submit written questions for answers from a panel of Sound Transit staff or provide verbal public comments on the 2021 SEPA Draft EIS. While all members of the public were invited to provide comments, in an effort to center on equity and provide access to people who have historically been excluded from public processes, Sound Transit invited attendees who identified as people of color, people with disabilities, and anyone working with an interpreter the opportunity to speak first before opening the floor to the rest of the attendees.

Sound Transit received, in total, approximately 280 communications during the 2021 SEPA Draft EIS comment period. A majority of these communications were from the general public, and the remainder were from government sources, such as Tribes, agencies, jurisdictions, and elected officials, and from affected businesses and community groups.

In response to the 2021 SEPA Draft EIS, most of the communications from the public expressed a preference for or against a specific alternative site. In general, most comments supported the Midway Landfill Alternative and/or opposed the South 344th Street Alternative. The most common general themes in the public comments, outside of statements for or against a particular alternative, concerned impacts to the community or neighborhood due to displacements of residents, businesses, and employees as well as impacts to natural resources such as streams, wetlands, and habitat.

After the end of the comment period, Sound Transit collected and considered the comments received and prepared a Comment Summary Report (Sound Transit 2021). After considering the potential impacts disclosed in the 2021 SEPA Draft EIS and the comments received from Tribes, agencies, and the public, including the Environmental Justice Analysis, the Sound

Transit Board of Directors identified the South 336th Street Alternative as the Preferred Alternative for evaluation in the Final EIS (Motion M2021-81, December 2021).

4.3 Additional Targeted Outreach and Community Feedback

Outreach and engagement with property owners has occurred throughout the environmental review process. In 2019 and 2020, Sound Transit distributed fliers to businesses and residential homes neighboring the proposed OMF South site alternatives to provide them with information about the OMF South project.

In early January 2021, Sound Transit mailed a letter to potentially affected property owners. The letter notified each property owner of potential effects to their property and offered to meet with them. Information provided at a briefing for property owners included an overview of the project background, environmental review process, and property acquisition and relocation process. The project team called potentially affected businesses to offer briefings to learn more about the project, the property acquisition and relocation process, and how to comment on the 2021 SEPA Draft EIS.

Sound Transit held three individual briefings for property owners during the 2021 SEPA Draft EIS comment period and continues to offer briefings upon request. Project representatives also met with the following property owner groups during the comment period to provide project updates and answer questions:

- Belmor leadership and residents
- Pacific Christian Academy
- Christian Faith Center
- GarageTown

The primary topics heard through these outreach efforts were around the opportunity for living-wage jobs and concerns over impacts to businesses, employees, and residents.

The Belmor community has been a focus for outreach and engagement due to the number and type of potential residential displacements. Sound Transit has met with individual residents as well as the larger Belmor Community over a dozen times over the past several years. In these meetings, the residents have been provided information on the OMF South project, potential site selection, the EIS, and the acquisition and relocation process. As some mobile homes would be acquired by Sound Transit as real property, these briefings have primarily centered around how the acquisition and relocation process, including how displaced residents would have a fully dedicated assigned agent working with them throughout the process. In addition to the virtual meetings, many more individuals have reached out to Sound Transit's Community Outreach Team via email and letters to inquire about the project and potential impacts to their community.

Feedback heard during engagement with the Belmor community included:

- Questions on why Sound Transit identified a route that will impact so many senior citizens
- Uncertainty about which units would be displaced
- Concern about losing access to the golf course and other park amenities
- Changes to OMF South project schedule, which makes people feel more in limbo and "trapped"

- That many residents are elderly (over 70) and on fixed income
- Concerns about where residents would be able to afford to move
- Concerns from some residents about having mortgages and new mobile homes
- That some of the older mobile home units (built in the 1970s or earlier) are either not eligible or feasible to be moved
- Concerns about the park ownership (Hynes Group) not communicating with the residents.

The OMF South project team attends events held by community organizations in the project area to connect with audiences that may not receive project information otherwise. By attending these events, Sound Transit builds relationships and establishes an ongoing presence in communities in the project area, provides project information and answers questions, and offers ways to stay engaged through project email updates. The project team has focused on attending events in traditionally underserved communities and providing in-language project information. Examples include the Kent Farmers Market and the Federal Way Farmers Market.

5 PROJECT IMPACTS, BENEFITS, AND POTENTIAL MITIGATION

DOT Order 5610.2(a) requires agencies to explicitly consider human health and environmental effects related to transportation projects that may have a disproportionate and adverse effect on minority or low-income populations. Section 5.1 summarizes the potential for any disproportionate and adverse effects on minority or low-income populations for the project alternatives along with potential avoidance, minimization, and mitigation measures specific to those impacts. Sections 5.2 through 5.4 describe indirect impacts, cumulative impacts, and project benefits, respectively.

5.1 Direct Impacts and Potential Mitigation Measures

5.1.1 No-Build Alternative

Under the No-Build Alternative, no impacts from the project to environmental justice populations are expected and benefits to environmental justice populations would be limited. However, for the purposes of the Draft EIS, the No-Build Alternative assumes that by the design year 2042, FWLE and all planned Sound Transit 3 projects, including TDLE, are built along with the other public and private projects planned within the study area. Without OMF South, TDLE would construct the mainline track associated with the Preferred and South 344th Street alternatives later in time. Impacts associated with construction of the mainline track are addressed within the build alternatives impacts discussion below.

The OMF South facility provides maintenance facilities required to support the full-service levels of FWLE and Sound Transit 3. Under the No-Build Alternative, the full operational capacity of the Link system would not be realized, and it would therefore provide limited benefits to environmental justice populations due to reduced transit service levels.

5.1.2 Build Alternatives

Table E.5-1 summarizes impacts and potential mitigation for the project alternatives as analyzed in the Draft EIS as well as where project impacts and benefits would affect minority and low-income populations. Table E.1.5-1 shows that the project would not have adverse impacts to many elements of the environment, or only minor impacts that could be mitigated. These elements are not further analyzed. However, for other elements of the environment, the project has the potential to cause adverse effects or affect minority and low-income populations differently. A more detailed discussion of the potential impacts and avoidance, minimization, and mitigation measures for these resources is provided in sections below the table (Section 5.1.2.1, Transportation; Section 5.1.2.2, Acquisitions, Relocations, and Displacements; Section 5.1.2.3, Economics; and Section 5.1.2.4, Social Resources, Community Facilities, and Neighborhoods). Further information can be found in Chapter 3 of the Draft EIS (Affected Environment, Environmental Impacts, and Potential Mitigation Measures).

Considering the demographics in the project area, the potential adverse impacts and potential mitigation, and the anticipated project benefits, the project is not anticipated to have disproportionate and adverse effects on minority and low-income populations as described under EO 12898 and DOT Order 5610.2(a).

Table E.5-1 Summary of Potential Impacts and Mitigation

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
Transportation ¹	<ul style="list-style-type: none"> No long-term impacts on freight, transit, parking, or nonmotorized facilities are anticipated. The alignment of the mainline tracks for the Preferred and South 344th Street alternatives would be constructed immediately adjacent to the southbound I-5 clear zone within the I-5 right-of-way. While portions of the mainline alignment would maintain clear zone standards, there may be locations where the minimum widths cannot be met. All the build alternatives would require demolition activities and earthwork that would generate truck trips during the construction effort. Depending on the design option chosen, the Midway Landfill Alternative could require up to 564 round trip truck trips per day during the most intense periods of site preparation activities. 	<ul style="list-style-type: none"> There would be avoidance and minimization measures to address potential traffic congestion during construction, such as developing a traffic management plan and avoiding traffic disruptions during peak travel times. In locations where the mainline tracks for the Preferred and South 344th Street alternatives reduce the available clear zone below standards, Sound Transit would reestablish a clear zone by regrading or installing guardrails, barriers or impact attenuators. These measures would not adversely affect transportation safety in the study area. 	<ul style="list-style-type: none"> There are no adverse transportation impacts expected for the Preferred and South 344th Street alternatives. Construction truck trips would be substantially greater for the Midway Landfill Alternative, which has a higher percentage of environmental justice populations within its study area than the surrounding jurisdictions (similar to the other build alternative locations). While I-5 and the arterials surrounding the Midway Landfill Alternative should accommodate the additional truck traffic, the large number of daily truck trips over several years necessary for site preparation could exacerbate existing traffic congestion in some locations, and be perceived by the community as an adverse impact. Construction traffic could cause noise and visual impacts to residents adjacent to the project site and haul routes. See the Visual and Aesthetics Resources and Noise and Vibration sections of this table for more detail. 	<ul style="list-style-type: none"> OMF South would support the system-wide expansion of light rail as called for in the Sound Transit 3 plan, including expansion into the south corridor from Federal Way to Tacoma. As a result, improved regional connectivity and mobility would accrue to a larger extent for minority and low-income residents as a primary and affordable means of transportation.

Notes:

(1) See Section 5.1.2.1 for more detail on transportation impacts and mitigation.

Table E.5-1 Summary of Potential Impacts and Mitigation (continued)

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
Acquisitions, Displacements, and Relocations ²	<ul style="list-style-type: none"> • OMF South would acquire public and private property for the mainline track and OMF site. As a result of these acquisitions, some residences, businesses, and public uses would be displaced. • Preferred Alternative with 40 mph Alignment displacements: 86 residences, 6 businesses, and 1 religious facility. • Preferred Alternative with 55 mph Design Option displacements: 92 residences, 6 businesses, and 1 religious facility. • South 344th Street Alternative with 40 mph Alignment displacements: 91 residences, 11 businesses, and 4 religious facilities. • South 344th Street Alternative with 55 mph Design Option displacements: 97 residences, 11 businesses, and 4 religious facilities, the most impacts of all alternatives. • Of the residential displacements for the Preferred and South 344th Street alternatives, a majority would be mobile homes at Belmor Park. • Midway Landfill Alternative displacements: 4 businesses, 0 residences, and 0 religious facilities; the least impacts of all alternatives. 	<ul style="list-style-type: none"> • Consistent with the Uniform Relocation Act, residents and businesses displaced by the project would receive compensation and relocation assistance in accordance with Sound Transit’s adopted real estate property acquisition and relocation policy, procedures, and guidelines (Sound Transit 2002 and 2011). • There may be opportunities for relocation of some residents, social resources, and businesses in the project vicinity, including limited relocation opportunities within Belmor for residents of the potentially impacted mobile home park. • For residential relocations, Sound Transit relocation specialists would work with affected residents to help them relocate nearby to a dwelling that is as similar to their current dwelling as possible. 	<ul style="list-style-type: none"> • Minority and low-income populations would be impacted by the acquisition, displacement, and relocation of residences and businesses. Sound Transit would ensure that comparable housing is made available, whether the displaced resident owns or rents their home. Aside from the level of advisory services required by each displaced resident, the mitigation provided to these populations would be the same as for the general population regardless of low-income or minority status. 	<ul style="list-style-type: none"> • None.

Notes:

(2) See Section 5.1.2.2 for more detail on acquisitions impacts and mitigation.

Table E.5-1 Summary of Potential Impacts and Mitigation (continued)

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
Land Use	<ul style="list-style-type: none"> All alternatives would require acquisitions and conversion of existing land uses (commercial, single-/multi-family residential, public/institutional, vacant) to a transportation-related land use. Construction activities would not affect land use patterns in the study area. 	<ul style="list-style-type: none"> No mitigation would be required. 	<ul style="list-style-type: none"> No impacts. 	<ul style="list-style-type: none"> None.
Economics ³	<ul style="list-style-type: none"> Direct economic impacts include business and employee displacements, associated potential tax impacts, and changes in development patterns and regional freight mobility. The Preferred Alternative would result in 7 business displacements and 127 employee displacements. The South 344th Street Alternative would result in 15 business displacements and 208 employee displacements. The Midway Landfill Alternative would result in 4 business displacements and 36 employee displacements. Construction activity may disrupt current economic activity by increasing traffic delays and may result in other negative impacts, such as increased noise adjacent to the construction site. Construction would bring revenue into the economy with the jobs that it produces, and the money spent by the construction employees in the surrounding community. 	<ul style="list-style-type: none"> Long-term operation of OMF South is not anticipated to result in adverse economic effects that would require mitigation. Relocation assistance for business displacements is discussed in Draft EIS Section 3.3, Acquisitions, Displacements, and Relocations. Construction mitigation plans would be developed to address the needs of businesses that may be affected during construction. 	<ul style="list-style-type: none"> Based on the types of businesses displaced and the demographic characteristics of the corridor, some displaced businesses are likely minority-owned and include minority and/or low-income employees. 	<ul style="list-style-type: none"> By supporting the development of light rail service, OMF South provides improved access to employment centers and expanded employment opportunities for minority and low-income persons residing in the project corridor. Project would result in the creation of approximately 610 jobs at the OMF site. Construction could generate \$2.4 to \$4.2 billion in economic output and generate 11,200 to 20,000 jobs in the region.

Notes:

(3) See Section 5.1.2.3 for more detail on economic impacts and mitigation.

Table E.5-1 Summary of Potential Impacts and Mitigation (continued)

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
<p>Social Resources, Community Facilities, and Neighborhoods⁴</p>	<ul style="list-style-type: none"> All OMF South build alternatives include residential and commercial property acquisitions and land use conversions. The Preferred Alternative would displace residential units within Belmor, disrupting social cohesion. It would also adversely affect social resources, including displacement of the Christian Faith Center, which includes a child-care center and the Pacific Christian Academy school, and 6 businesses, including a home-based daycare. The South 344th Street Alternative would have the most impacts on social resources of the build alternatives. It would have the same impacts as the Preferred Alternative on Belmor and would also displace 4 churches and 11 businesses. The Midway Landfill Alternative would have the least long-term impacts to social resources or community facilities, it would displace 4 businesses. Community resources and neighborhoods in proximity to construction activities would be impacted by increased truck traffic, localized impacts to air and visual quality; and increased noise and vibration. 	<ul style="list-style-type: none"> Specific design features, best management practices (BMPs), and mitigation measures would be used to minimize adverse impacts to social resources, community facilities, and neighborhoods. Generally, Sound Transit identified that there is a sufficient supply of housing in the study area and adequate space to relocate religious facilities, childcare centers, and other businesses that serve EJ populations. Access to community facilities would be maintained during construction to the extent practicable. Avoidance, minimization, and mitigation measures for impacts to related project elements and construction impacts, including transportation, visual, air, and noise impacts, are described under elements of the environment in in this table. 	<ul style="list-style-type: none"> Based on the demographic characteristics of the corridor, all build alternatives would displace businesses that serve or employ minority or low-income populations. The Preferred and South 344th Street alternatives would displace social resources, including religious institutions that serve low-income and minority populations in the study area. The Preferred Alternative would displace the Christian Faith Center and an associated school and childcare center, which would be challenging to relocate due to its size. The Preferred Alternative would displace a home-based daycare that offers subsidized childcare and dual language programs. 	<ul style="list-style-type: none"> None.

Notes:

(4) See Section 5.1.2.4 for more detail on social resource impacts and mitigation.

Table E.5-1 Summary of Potential Impacts and Mitigation (continued)

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
Visual and Aesthetic Resources	<ul style="list-style-type: none"> All the build alternatives would change visual conditions by removing existing landscape features and constructing new buildings, retaining walls, and elevated structures. Preferred and South 344th Street alternatives: Belmor residents near the mainline could experience adverse visual impacts. The South 344th Street Alternative tail tracks would impact WSDOT Resource Conservation Areas adjacent to the I-5 right-of-way. Midway Alternative: Midway Mobile Home Park residents north of the site could experience adverse visual impacts. Construction could result in a temporary decrease in visual quality. 	<ul style="list-style-type: none"> Preferred and South 344th Street alternatives: planting of trees and shrubs would soften visual impacts of the mainline through Belmor and adjacent to residents north of the OMF site. Sound Transit would consult with WSDOT and FHWA to develop site-specific measures for impacts to WSDOT Resource Conservation Areas along I-5 through replacement property or other measures. Midway Alternative: existing fencing and vegetation along with new landscaping would screen views of OMF South for nearby residents. 	<ul style="list-style-type: none"> Minority and low-income residents in close proximity to the project site would experience a change to the visual environment through the removal of trees and vegetation and the presence of project features such as the elevated mainline tracks, retaining walls, and buildings. Visual impacts would be less where these features can be screened or obscured by new vegetation or landscaping. Construction activities, including truck traffic, could result in temporary decreases in visual quality. 	<ul style="list-style-type: none"> None.
Air Quality and Greenhouse Gases	<ul style="list-style-type: none"> Long-term emissions associated with employee commutes, material deliveries, and on-site vehicle maintenance are not anticipated to exceed air quality standards. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by excavation, grading, hauling, and other activities. 	<ul style="list-style-type: none"> Sound Transit would implement construction BMPs to minimize the impact on existing residential and recreational uses from construction-related emissions and nuisance dust. 	<ul style="list-style-type: none"> No adverse impacts. 	<ul style="list-style-type: none"> None.

Table E.5-1 Summary of Potential Impacts and Mitigation (continued)

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
Noise and Vibration	<ul style="list-style-type: none"> • There are no FTA noise impacts or WAC exceedances associated with operation of any of the OMF sites. • The 55 mph Design Option mainline would result in noise impacts for four single-family residences in Belmor for both the Preferred and South 344th Street alternatives. • There are no vibration impacts associated with operation of any of the build alternatives. • Construction may result in temporary noise and vibration impacts for all build alternatives. • Residences at Belmor may experience vibration impacts depending on construction methods used for the Preferred and South 344th Street alternatives. 	<ul style="list-style-type: none"> • In accordance with the Sound Transit Link Noise Mitigation Policy, the project would mitigate all noise and vibration impacts with noise walls or other measures. Based on the current design, noise impacts along the mainline through Belmor would be mitigated with a noise wall. • A construction management plan would be developed during the design phase of the project detailing BMPs to minimize impacts on local businesses and residents, including noise and vibration impacts. 	<ul style="list-style-type: none"> • After mitigation, there would be no operational noise impacts from the project. • Minority and low-income people within close proximity to construction activities would experience temporary noise and vibration impacts during construction. 	<ul style="list-style-type: none"> • None.
Ecosystem Resources	<ul style="list-style-type: none"> • All build alternatives would have direct long-term impacts on ecosystem resources where permanent features, such as project facilities, overlap ecosystem components, such as wetlands, wetland buffers, streams, stream buffers, or native forest. • Temporary construction-related impacts would occur where wetlands, wetland buffers, streams, stream buffers, or native forest are affected by clearing and ground-disturbing work and would be revegetated following construction. 	<ul style="list-style-type: none"> • For unavoidable long-term impacts on wetlands, streams, and their buffers, Sound Transit would develop compensatory mitigation during the permitting phase in accordance with applicable federal, state, and local requirements and guidelines. That could include onsite restoration, replacement sites, and the use of the King County In-Lieu Fee Program or other approved mitigation banks. 	<ul style="list-style-type: none"> • No adverse impacts. 	<ul style="list-style-type: none"> • None.

Table E.5-1 Summary of Potential Impacts and Mitigation (continued)

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
Water Resources	<ul style="list-style-type: none"> All build alternatives would add both pollution-generating impervious surfaces (PGIS) and non-pollution-generating impervious surfaces (NPGIS) in the study areas for all project alternatives and would require stormwater management BMPs, such as flow control or treatment. Construction of all build alternatives could affect surface and groundwater quality by increasing flooding or erosion or cause potential degradation of water quality when runoff is generated in construction areas. 	<ul style="list-style-type: none"> With the application of required stormwater BMPs, such as flow control or treatment facilities, no temporary or long-term adverse impacts on water resources are expected and no mitigation would be required. Stormwater pollution prevention and sediment and erosion control plans would be developed that would specify BMPs for managing water runoff, protecting water quality, and preventing erosion 	<ul style="list-style-type: none"> No adverse impacts. 	<ul style="list-style-type: none"> None.
Geology and Soils	<ul style="list-style-type: none"> The project would be designed to meet current seismic standards and to address any concerns over slope stability, minor settlement, and corrosive soils to prevent long-term impacts. Construction impacts could include erosion of soils within the construction area and potential impacts on shallow groundwater quality from construction activities that would be addressed with standard BMPs. 	<ul style="list-style-type: none"> No mitigation would be required. 	<ul style="list-style-type: none"> No adverse impacts. 	<ul style="list-style-type: none"> None.

Table E.5-1 Summary of Potential Impacts and Mitigation (continued)

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
Hazardous Materials	<ul style="list-style-type: none"> For all build alternatives, operation of the project could cause long-term impacts on the environment if an accidental release of hazardous materials occurs, such as a fuel spill. Construction impacts of the Midway Landfill Alternative could include the potential release of contaminated air, soil, and groundwater due to its characterization as a high-risk hazardous materials site. 	<ul style="list-style-type: none"> Mitigation would be required for construction of the Midway Landfill Alternative, which would include replacement of the landfill cap and other measures. 	<ul style="list-style-type: none"> Minority and low-income residents adjacent to the construction of the Midway Landfill Alternative could be exposed to the release of contaminated air, soil, and groundwater, due to the landfill's characterization as a high-risk hazardous materials site. 	<ul style="list-style-type: none"> None.
Public Services	<ul style="list-style-type: none"> OMF South is not anticipated to result in adverse impacts to public services. 	<ul style="list-style-type: none"> No mitigation would be required. 	<ul style="list-style-type: none"> No adverse impacts. 	<ul style="list-style-type: none"> None.
Utilities, Energy, and Electromagnetic Fields	<ul style="list-style-type: none"> OMF South operation would not result in any long-term adverse impacts to existing utilities in the project corridor. Construction could result in temporary impacts such as service disruptions due to utility relocations. There are no potential or adverse electromagnetic field impacts in the study area. No adverse impacts on energy are anticipated. 	<ul style="list-style-type: none"> Temporary utility impacts would be avoided or minimized by maintaining required access to utilities and through communication with customers to inform them of planned or potential service disruptions. No mitigation would be required. 	<ul style="list-style-type: none"> OMF South would not result in any long-term adverse impacts to existing utilities. Minority and low-income residents within the vicinity of the project could experience temporary service disruptions due to utility relocations. 	<ul style="list-style-type: none"> None.
Historic and Archaeological Resources	<ul style="list-style-type: none"> None of the build alternatives are anticipated to have impacts on historic or archeological resources. 	<ul style="list-style-type: none"> No mitigation would be required. 	<ul style="list-style-type: none"> No adverse impacts. 	<ul style="list-style-type: none"> None.

Table E.5-1 Summary of Potential Impacts and Mitigation (continued)

Type of Impact	Impact Summary for Build Alternatives	Mitigation Summary	Impacts on Minority and Low-Income Populations	Benefit(s) to Minority and Low-Income Populations
Parks and Recreational Resources	<ul style="list-style-type: none"> • None of the build alternatives would have long-term impacts on public parks or other public recreation facilities within the study area. • There would not be any direct construction impacts to parks or recreational facilities, but construction of the mainline tracks for the Preferred and South 344th Street Alternatives could cause temporary light, noise, and dust impacts to Cedar Grove Park, or affect access due to temporary detours, lane closures, or other traffic impacts. 	<ul style="list-style-type: none"> • Construction impacts would be addressed through public outreach and other BMPs to maintain access and minimize light, noise, and dust impacts. No mitigation would be required. 	<ul style="list-style-type: none"> • There would be no long-term adverse impacts on public parks or other public recreational facilities within the study area. • Construction of the mainline tracks for the Preferred and South 344th Street Alternatives could cause temporary light, noise, and dust impacts to Cedar Grove Park, or affect access due to temporary detours, lane closures, or other traffic impacts. 	<ul style="list-style-type: none"> • None.

For most of the elements of the environment listed in the table above (Table E.5-1), adverse impacts to minority and low-income people in the study area would be mitigated. Therefore, these impacts are not considered to be disproportionate and adverse for environmental justice populations.

These subjects are described thoroughly in Chapter 3 of the Draft EIS and are not analyzed further in this Environmental Justice Assessment. The following sections focus on the elements of the environment that would potentially impact environmental justice populations. These sections describe impacts for the following subjects: Transportation; Acquisitions, Displacements, and Relocations; Economics; and Social Resources, Community Facilities, and Neighborhoods.

5.1.2.1 Transportation

Long-term transportation impacts are relatively similar for all three build alternatives; however, construction impacts would differ. During construction, each build alternative would require some preparatory demolition and earthwork that would generate truck trips in addition to material delivery and general construction vehicle activity throughout the duration of construction. Most construction-period traffic would occur during import and export of material to and from the site during site preparation. The Preferred and South 344th Street alternatives would require similar peak daily truck trips during construction. However, the Midway Landfill Alternative would require up to nearly three times the number of truck trips, depending on the subsurface construction design option.

Additionally, construction duration varies between the Preferred and South 344th Street alternatives and the Midway Landfill Alternative. For the Preferred and South 344th Street alternatives, site preparation would take approximately 1 year and 6 months, assuming 12-hour workdays, 6 days per week. For the Midway Landfill Alternative, site preparation could take up to 5 years and 7 months, using the same assumptions.

The extensive site preparation work required for the Midway Landfill Alternative subsurface construction design options would expose the residents within the study area, which has a higher concentration of environmental justice populations than the surrounding community, to construction impacts over a longer period of time. In particular, it would result in higher volumes of construction traffic for exporting and importing the vast quantities of fill material. While I-5 and the arterials surrounding the Midway Landfill Alternative should accommodate the additional truck traffic, the substantial number of daily truck trips necessary for those subsurface construction design options could exacerbate existing congestion in some locations and be perceived as an adverse impact.

Avoidance, Minimization, and Mitigation

OMF South is not anticipated to result in long-term or construction impacts to freight, transit, nonmotorized transportation, or parking. Therefore, no mitigation for those transportation elements is proposed. However, there would be avoidance and minimization measures to address potential traffic congestion during construction, such as developing a traffic management plan and avoiding traffic disruptions during peak travel times.

For all build alternatives, a construction transportation management plan would be developed to address potential traffic and transportation impacts to the community, including minority and low-income populations. The plan would address site access, traffic control, hauling routes, impacts to transit, construction employee parking, impacts to local businesses, and pedestrian and bicycle control in the area. It would be prepared per city of Federal Way or city of Kent

requirements and in coordination with WSDOT and FHWA, as applicable. Sound Transit would strive to maintain access to all properties as needed. However, if temporary driveway closures are required, access to these properties would be maintained to the extent practical through alternative routes. If access to a business could not be maintained during construction, the specific construction activity would be reviewed to determine whether it could occur during non-business hours or whether the parking and users of this access could be accommodated at an alternative location.

5.1.2.2 Acquisitions, Relocations, and Displacements

During the environmental review process, Sound Transit developed preliminary estimates for acquisitions and relocations using conceptual designs for the OMF South build alternatives. As the project continues to progress, these estimates will continue to be refined. This section focuses on residential displacements. Business displacements are detailed in Section 5.1.2.3, Economics, and displacement of social resources is discussed in Section 5.1.2.4, Social Resources, Community Facilities, and Neighborhoods.

The South 344th Street Alternative would have the most business and residential displacements, and the Midway Landfill Alternative would have the least. For both the Preferred and South 344th Street alternatives, most residential displacements would occur within Belmor from the addition of the mainline tracks. Belmor is a manufactured/mobile home community for people aged 55 and older and is comprised of one large parcel (approximately 63 acres) with capacity for over 300 mobile homes and several resident amenities, including a golf course, club house, and pool. Each resident rents the land on which the mobile homes sit, and some of the mobile homes are owned by residents, while others are rented.

Belmor's large area makes up almost one quarter of the Census block group in which it is located, and more than half of the remaining area is devoted to commercial land uses. That means that the demographics within the Census block group are likely a good representation for the demographics within Belmor. The population in this particular block group is 43 percent minority and 27 percent low income, which are both lower than the average minority and low-income populations in the study areas for the Preferred and South 344th Street alternatives and Federal Way as a whole (Table E.3-1). The proportion of the population that is 64 and older in the Belmor block group is 38 percent, which is more than double that of the study areas and Federal Way, and the proportion of households with limited English proficiency is 14 percent, which is slightly less than that of the study areas and slightly more than Federal Way. Additionally, the median household income is \$58,904 in this block group, which is higher than that of the study area but lower than that of Federal Way.

The Census data is largely confirmed by information gathered by Sound Transit during targeted outreach with Belmor residents (discussed in Section 4.3 above). Based on this outreach, Sound Transit learned that many Belmor residents are retired and living on fixed incomes — though they are not necessarily considered low-income — and that the population is largely English-speaking.

In addition to displacements in Belmor from the mainline tracks, the Preferred and South 344th Street alternatives would displace 15 and 20 additional residences, respectively, associated with the OMF site. For the Preferred Alternative, these displaced residences are along S 340th Street and at the northwest corner of S 336th Street and I-5. For the South 344th Street Alternative, the additional displaced residences are also located along S 340th Street and 18th Place S.

Displaced residences north of S 336th Street include five single-family homes and one four-unit multi-family building. These residences are in a relatively small Census block group that is 84 percent minority and 53 percent low-income, which are above the averages for the Preferred Alternative study area and city of Federal Way (Table E.3-1). Additionally, the median household income is \$40,807 in this block group, which is lower than that of the study area and Federal Way.

Displaced residences along S 340th Street and 18th Place S are all single-family homes and are in a much larger Census block group, so it is more difficult to accurately assign representative demographics. The population in this block group is 65 percent minority and 53 percent low-income. The proportion of low-income people is higher than both the study area and city of Federal Way (Table E.3-1). However, the median household income is \$58,451 in this block group, which is higher than that of the study area but lower than that of Federal Way.

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

Avoidance, Minimization, and Mitigation

When developing the OMF South alternatives, Sound Transit used several measures to avoid and minimize potential acquisition impacts. The prospective OMF South sites were analyzed for potential property impacts, and the build alternatives evaluated in this Draft EIS were ultimately identified, in part, to avoid or minimize impacts to residents and businesses. During design, the OMF South sites were configured to meet programming requirements while minimizing, to the extent feasible, acquisitions, displacements, and relocations. The mainline tracks have been located near or within public rights-of-way to reduce the number of private property impacts.

Any properties temporarily impacted during construction would be restored to their previous condition or better. Those permanently displaced by the project – including residents, businesses, and other community facilities – would receive compensation and relocation assistance in accordance with Sound Transit’s adopted Real Property Acquisitions and Relocation Policy, Procedures, and Guidelines (Sound Transit 2017), which are consistent with the federal Uniform Relocation Act. While Sound Transit’s relocation program ensures all persons displaced by the project are treated consistently and equitably, no two relocations are the same. Sound Transit would tailor the relocation to meet residents’ specific needs using an occupancy survey and follow-up interviews. If a resident currently owns their home, then they would not lose homeownership with relocation, unless their preference was to rent rather than own.

For all relocations, Sound Transit would work with those affected to try to keep them in the same general area. This includes identifying replacement housing that considers such factors as proximity to commercial and community facilities, schools (if applicable), an individual’s place of employment, and accessibility to transit if the residents are transit dependent. Although property uses may change before construction of OMF South, research indicates that there would be available locations for displaced businesses, residents, and other property owners to be relocated within the same general area.

Relocation of mobile home residents would be more challenging because there is little availability in mobile home communities within Pierce and King County. However, there are several different types of relocation options potentially available for displaced Belmor residents:

- Relocate within Belmor
- Relocate to another 55-plus park, renting or purchasing a mobile home within that park, or potentially moving their current mobile home
- Relocate to a family park, renting or purchasing a mobile home within that park, or moving their existing mobile home
- Rent or purchase a vacant lot and relocate the existing mobile home to the site
- Relocate to a purchased or rented single-family residence, condominium, or apartment
- Other options, such as assisted living facilities

5.1.2.3 Economics

For all build alternatives, long-term economic impacts are mainly associated with business displacements and employment changes. Religious facilities (e.g., churches) were included in total business displacements for the purpose of analysis in the EIS, but impacts to these facilities are detailed in Section 5.1.2.4, Social Resources, Community Facilities, and Neighborhoods.

The South 344th Street Alternative would displace the most businesses and employees, all of which are associated with the OMF site. The Preferred Alternative would displace roughly half as many businesses, and the Midway Landfill Alternative would displace even fewer. For the Preferred and South 344th Street alternatives, a majority of the business displacements in Federal Way are related to automotive or equipment industries. Additionally, the Preferred Alternative would displace an in-home childcare center (see Section 5.1.2.4, Social Resources below), and the South 344th Street Alternative would displace two specialized facilities — Ellenos Yogurt and GarageTown. The Midway Landfill Alternative would displace an insurance firm, a vision care center, and a paint sales and recycling center.

The effects of potential business displacements are complex. Substantial displacement of local businesses can affect residents and businesses alike. Often the direct impacts for displaced businesses are financial, but there can be other consequences as well. Firm size and community importance may determine the level of impact on employment and to the community. For example, small and minority-owned businesses that rely on a localized customer base may have more difficulty finding substitute locations. Businesses that use machinery or hazardous substances may require large parcels or have additional challenges that may make relocation difficult. Further, a business may have a suitable place to relocate, but the new location could limit access to its existing labor pool.

Similar to residential relocations, a detailed business survey will be completed after the Sound Transit Board selects the project to be built and the real estate process moves forward. The purpose of a business survey is to collect general information that can help determine if businesses are owned, employed, or frequented by environmental justice populations. With the exception of the in-home childcare center (see Section 5.1.2.4, Social Resources, Community Facilities, and Neighborhoods), based on outreach and community input to date, businesses displaced by the project alternatives are not key resources, employers, or gathering places for environmental justice populations. There are similar retail businesses in the area that would be accessible to the community.

Avoidance, Minimization, and Mitigation

For business relocations, adequate commercial and industrial spaces may be available in the market to relocate building owners and tenants displaced as part of the project. Industrial users requiring specific lot sizes and utilities may be more difficult to relocate, including properties such as GarageTown and Ellenos Yogurt that have specific needs, like storage facilities or specialized machinery. Sound Transit would conduct business surveys to learn more about the specific relocation needs of all displaced businesses.

Section 5.1.2.2, Acquisitions, Relocations, and Displacements, provides additional information about Sound Transit's property acquisition and relocation policies and procedures that would be applied to all displaced businesses.

5.1.2.4 Social Resources, Community Facilities, and Neighborhoods

Impacts to social resources are primarily related to displacement of religious facilities, which could affect community cohesion in neighborhoods surrounding the OMF South build alternatives. Section 5.1.2.2, Acquisitions, Relocations, and Displacements, provides additional information about Sound Transit's property acquisition and relocation policies and procedures that would be applied to all displaced social resources and community facilities.

The Preferred Alternative would displace one religious facility, the Christian Faith Center church, which includes an associated day care center (CF Kidz) and separate religiously affiliated school (Pacific Christian Academy). The Christian Faith Center is a large-capacity church; therefore, it could be challenging to relocate a religious facility of this size and displacing it would impact the members of the service population from within and beyond the 0.5-mile study area. Outreach with the Christian Faith Center reported that they serve minority and low-income populations. In addition to CF Kidz at the Christian Faith Center, the Preferred Alternative would displace an in-home childcare center for children ages 2 to 13. This childcare center offers programs in English and Somali and accepts subsidized payments.

The South 344th Street Alternative would displace four religious facilities: Family Life Community Church, Voice of Hope Church, and Redwood Church of God and Tabernacle Temple of Praise, which share a building. Based on project engagement and other research, these churches offer services in multiple languages and serve minority populations. For example, the Family Life Community Church offers services in English and Spanish, and the Voice of Hope Church offers services in Russian. The displacement of religious facilities could affect community cohesion if relocation of these facilities is not able to be accommodated in proximity to the study area; however, because these churches are currently located in commercial or industrial buildings, it is likely that they could be relocated to comparable properties nearby.

During construction, the Preferred and South 344th Street alternatives could also temporarily impact surrounding social resources and religious facilities, such as El Centro de la Raza, the Iglesia Ni Cristo Church, the KAC Baptist Church, and the Russian-Ukrainian Seventh Day Adventist Church. Each of these religious facilities provide church services in languages other than English and their congregations are likely largely made up of minority populations.

There would be no long-term or construction impacts to social resources or community facilities within the Midway Landfill Alternative study area. The Midway Landfill Alternative would have the fewest impacts to social resources and community cohesion compared to other build alternatives.

Avoidance, Minimization, and Mitigation

Relocations of social resources, like religious facilities and childcare centers, would be treated similarly to business relocations. With the exception of the Christian Faith Center, displaced religious facilities may be less complex to relocate due to their smaller size and location in commercial buildings. The Christian Faith Center and Pacific Christian Academy may be challenging to relocate because of their large size.

As discussed in the impact section above, and based on the information available at this time, the Preferred Alternative would displace two childcare centers — one at the Christian Faith Center and one in-home facilities. Within the 0.5-mile study area, there is only one other childcare facility; within an expanded 1-mile buffer, there are five additional childcare facilities, all of which accept subsidized payments. Based on outreach to these facilities, there appears to be available capacity for new children to attend.

Section 5.1.2.2, Acquisitions, Relocations, and Displacements, provides additional information about Sound Transit's property acquisition and relocation policies and procedures that would be applied to all displaced social resources.

5.2 Indirect Impacts

OMF South would support system-wide light rail expansion for the approved Sound Transit 3 program. The Sound Transit 3 program would improve regional connectivity and mobility, increase access to employment opportunities, and provide a reliable means of transportation for populations reliant on public transit, including low-income and minority populations.

5.3 Cumulative Impacts

The OMF South project, in addition to the TDLE and FWLE projects and other investments in regional transportation infrastructure, would enable more frequent Link service and improve overall mobility within the region, in addition to improving local connections to economic opportunity, goods, and services. Improved transit service and mobility and access to opportunity would be considered a benefit to low-income and minority people in the study area and the region as a whole.

In addition, cumulative impacts from reasonably foreseeable commercial and residential development projects and proposed land use changes could result in benefits to communities near future Link stations, including those composed of minority and low-income populations. The OMF South would support the expansion of light rail service and the benefits that derive from it. These benefits could include improved access to a regional high-capacity transit network, residential infill, growth in employment base, and greater support of local businesses, especially to communities in proximity to future Link light rail stations.

The improved service that the project enables may be reasonably expected to increase the potential for future private commercial and/or residential development activity near Link stations, which could increase property values near stations and augment tax revenues. However, this activity may also affect the availability of low-income housing opportunities and may result in the loss of affordable housing and/or displacement of low-income people. Housing goals and policies of local jurisdictions will influence future affordable housing options near Link stations. Sound Transit's Equitable Transit Oriented Development Policy encourages affordable housing

development on any potential surplus property near future Link stations, which could help mitigate cumulative impacts (Sound Transit 2018).

If OMF South were constructed at similar times as other large infrastructure projects, residents and businesses, in particular those that are minority or low-income, could experience increased short-term construction impacts due to cumulative increases in congestion, noise, and access limitations. However, after mitigation and implementation of avoidance and minimization measures, adverse impacts would affect minority and low-income populations to the same degree as the population as a whole.

As part of the City Center Access project in Federal Way, transportation improvements and stream culvert work would displace Belmor residents in the vicinity of the OMF South mainline tracks for the Preferred and South 344th Street alternatives. Some of these mobile home displacements may overlap with OMF South displacements, or there may be additional displacements. Because the City Center Access project is currently unfunded, it is likely that OMF South would begin the acquisition and relocation process before Federal Way begins project construction. Therefore, the two projects would not have overlapping construction impacts, but may have cumulative impacts within Belmor, depending on the OMF South mainline track option and the final design for the City Center Access project.

5.4 Project Benefits

Under DOT Order 5610.2(a), the benefits of a proposed transportation project may be considered when determining whether any disproportionate and adverse effects on minority and low-income populations would occur.

OMF South would support the system-wide expansion of light rail as called for in Sound Transit 3, including expansion into the south corridor from Federal Way to Tacoma. This would, in turn, improve regional connectivity and mobility and provide a reliable means of transportation for populations reliant on public transit, including low-income and minority populations. While all populations within the project's service area would realize these benefits to the same extent, they could accrue to a higher degree for minority and low-income residents as a primary and affordable means of transportation.

Additional benefits to all populations, including environmental justice populations, would accrue through the addition of new jobs to build the project. In addition, the increased purchase and sale of goods and services within the community to facilitate construction, and the positive economic effects of construction workers' purchases in food and retail within the community would benefit businesses that are owned by environmental justice populations.

6 CONCLUSION

FTA will make the final environmental justice determination for the project following selection by the Sound Transit Board of a project site to be built. Their determination must consider the impacts of the project and who may be affected, then consider the mitigation proposed for these impacts, and finally consider any offsetting benefits to minority and low-income populations.

This environmental impact analysis for environmental justice populations concludes:

- The study area for all build alternatives includes populations that are predominately minority and low-income. Concentrations of minority and low-income populations in the study area are higher than the Sound Transit taxing district as a whole.
- All build alternatives would result in potential impacts as described in Table E.5-1. Impacts to environmental justice populations would not differ substantially among the build alternatives. Sound Transit would mitigate impacts through the application of measures presented in Chapters 3 of the Draft EIS and summarized in Table E.5-1 and Section 5, Project Impacts and Potential Mitigation. The design measures, BMPs, and other mitigation measures would reduce the impacts on all populations, including minority and low-income populations, to levels that would not be disproportionate and adverse.
- The project is anticipated to have positive impact to all populations, including environmental justice communities, living in the study area by increasing transit reliability, access to transit, connectivity, and frequency that OMF South would contribute to. Other benefits include new jobs associated with the construction of the project. Additional economic opportunities may result from improved connectivity between communities, which could yield a benefit to communities living in the project area.
- Combined with mitigation and offsetting benefits, impacts of the project would not have disproportionate and adverse effects on minority and low-income populations as described under EO 12898 and DOT Order 5610.2(a).

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