



# ***Operations and Maintenance Facility South***

**NEPA Draft / SEPA Supplemental Draft  
Environmental Impact Statement –  
Executive Summary**



Federal Transit  
Administration



September 2023



September 22, 2023

Dear Recipient:

The U.S. Department of Transportation Federal Transit Administration (FTA) and Sound Transit (the Central Puget Sound Regional Transit Authority) have prepared this National Environmental Policy Act (NEPA) Draft / State Environmental Policy Act (SEPA) Supplemental Draft Environmental Impact Statement (EIS) on the proposed Operations and Maintenance Facility (OMF) South project. The facility would receive, test, commission, store, maintain, and deploy vehicles as part of the light rail system expansion. Sound Transit is the project proponent and SEPA lead agency. FTA is the lead Federal agency.

This EIS has been prepared pursuant to NEPA (42 United States Code 4321 et seq.) and SEPA (Chapter 43.21C Revised Code of Washington). It has been prepared to inform the public, agencies, and decision makers about the potential environmental impacts and benefits of building and operating the OMF South in the city of Kent or Federal Way, Washington.

In May 2019, the Sound Transit Board identified the OMF South alternatives to study in an EIS. Sound Transit published a SEPA Draft EIS in March 2021. The Sound Transit Board considered the SEPA Draft EIS analysis and comments and then identified the South 336<sup>th</sup> Street Alternative as the Preferred Alternative for further evaluation. This document supplements the 2021 SEPA Draft EIS. It addresses design changes to the alternatives and NEPA requirements to support federal funding and approvals.

The major choice for the project involves the location of a light rail OMF in the South system corridor. FTA and Sound Transit will prepare a Final EIS, which will respond to substantive comments on the 2021 SEPA Draft EIS and on this NEPA Draft / SEPA Supplemental Draft EIS. The Final EIS will include an evaluation of impacts and proposed mitigation for the Preferred Alternative and other alternatives. After completion of the Final EIS, the Sound Transit Board will select the project to be built. FTA will also issue a Record of Decision, which will state FTA's decision on the project and list Sound Transit's mitigation commitments to reduce or avoid impacts.

This NEPA Draft / SEPA Supplemental Draft EIS includes appendices and technical reports, which can be found online at <https://www.soundtransit.org/system-expansion/operations-maintenance-facility-south/documents>. Please see the Fact Sheet of this document regarding availability of appendices and technical report hard copies, information about public meetings, how to comment on this document, and whom to contact for further information.

Sincerely,

Erin Green  
Environmental Manager, South Corridor

**CHAIR**

**Dow Constantine**  
*King County Executive*

**VICE CHAIRS**

**Kent Keel**  
*University Place Councilmember*

**Dave Somers**  
*Snohomish County Executive*

**BOARD MEMBERS**

**Nancy Backus**  
*Auburn Mayor*

**David Baker**  
*Kenmore Councilmember*

**Claudia Balducci**  
*King County Councilmember*

**Bruce Dammeier**  
*Pierce County Executive*

**Cassie Franklin**  
*Everett Mayor*

**Christine Frizzell**  
*Lynnwood Mayor*

**Bruce Harrell**  
*Seattle Mayor*

**Debora Juarez**  
*Seattle Council President*

**Joe McDermott**  
*King County Councilmember*

**Roger Millar**  
*Washington State Secretary  
of Transportation*

**Ed Prince**  
*Renton Councilmember*

**Kim Roscoe**  
*Fife Mayor*

**Dave Upthegrove**  
*King County Council Chair*

**Peter von Reichbauer**  
*King County Councilmember*

**Kristina Walker**  
*Tacoma Deputy Mayor*

**CHIEF EXECUTIVE OFFICER**

**Julie E. Timm**

**Commitment to Accessibility**

Sound Transit and the United States Department of Transportation - Federal Transit Administration are committed to ensure that information is available in appropriate alternative formats to meet the requirements of persons who have a disability. If you require an alternative version of this file, please contact [FTAWebAccessibility@dot.gov](mailto:FTAWebAccessibility@dot.gov).

**OPERATIONS AND MAINTENANCE FACILITY SOUTH  
KING COUNTY, WASHINGTON**

**DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Submitted pursuant to  
the National Environmental Policy Act (NEPA) (42 United States Code 4322(2)(c))

**and**

**SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Submitted pursuant to  
the State Environmental Policy Act (SEPA) (CH 43.21C Revised Code of Washington)

Submitted by the  
**UNITED STATES DEPARTMENT OF TRANSPORTATION  
FEDERAL TRANSIT ADMINISTRATION**  
**and**  
**CENTRAL PUGET SOUND REGIONAL TRANSIT AUTHORITY**  
(Sound Transit)

In cooperation with

FEDERAL HIGHWAY ADMINISTRATION  
UNITED STATES ARMY CORPS OF ENGINEERS  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON STATE DEPARTMENT OF TRANSPORTATION  
CITY OF FEDERAL WAY  
CITY OF KENT

August 24, 2023  
Date of Approval

**SUSAN KAY  
FLETCHER**

Digitally signed by SUSAN  
KAY FLETCHER  
Date: 2023.08.24 16:18:19  
-07'00'

Susan Fletcher  
Acting Regional Administrator  
NEPA Responsible Official  
For Federal Transit Administration, Region 10

August 22, 2023  
Date of Approval

**Perry Weinberg**

Digitally signed by Perry Weinberg  
DN: cn=Perry Weinberg, o=Sound Transit, ou,  
email=perry.weinberg@soundtransit.org, c=US  
Date: 2023.08.22 16:24:05 -07'00'

Perry Weinberg  
Deputy Executive Director,  
Office of Environmental Affairs and Sustainability  
SEPA Responsible Official  
For Sound Transit



# ***Tribal Acknowledgement***

As we plan and build one of the largest transit expansions in North America, which includes one of the first light rail transit extensions on reservation lands in the history of the United States, we would like to acknowledge the people who have been here since time immemorial: the Puyallup Tribe of Indians, the Muckleshoot Indian Tribe, the Nisqually Indian Tribe, the Suquamish Tribe, the Squaxin Island Tribe, the Snoqualmie Indian Tribe, and the Confederated Tribes and Bands of the Yakama Nation. We would like to thank each Tribe for their partnership.

# Fact Sheet

## Project Title

Operations and Maintenance Facility South (OMF South)

## Proposed Action

The Central Puget Sound Regional Transit Authority (Sound Transit) proposes to construct and operate a light rail operations and maintenance facility in its South Corridor (OMF South). The facility would meet agency needs for an expanded fleet of light rail vehicles (LRVs). The need to expand LRV maintenance capacity was identified in Sound Transit 3: The Regional Transit System Plan for Central Puget Sound (Sound Transit 3). OMF South would be used to store, maintain, and deploy a minimum of 144 LRVs for daily service. It would provide facilities for vehicle storage, inspections, maintenance and repair, interior vehicle cleaning, and exterior vehicle washing. Additionally, the facility would receive, test, and commission new LRVs for the entire Link light rail system. OMF South would create high-skilled, living-wage jobs for more than 470 people in south King County.

OMF South would include three primary buildings: the Operations and Maintenance Facility (OMF) building, Maintenance of Way (MOW) building, and the Link System-Wide Storage building. The OMF building includes service lanes for vehicle maintenance, repair, carwash, cleaning, painting, spare parts storage, operations, and administration. The MOW building includes areas for maintenance and storage of spare parts for tracks, vehicle propulsion equipment, train signals, and other infrastructure. The Link System-Wide Storage building includes areas for receiving and storing all parts for the Link light rail system. The buildings could include offices, locker rooms, lunchrooms, and other spaces for employees.

OMF South would include runaround tracks to maneuver vehicles, storage tracks, a yard area for outside storage, a training track, traction power substations, and parking for employees, visitors, and nonrevenue vehicles. Additionally, OMF South would need to have tracks connecting it to an operating light rail line when the facility is planned to open. In southern King County the OMF will need to connect to the Federal Way Link Extension (FWLE). The length and location of these connecting tracks varies by site alternative.

Three site alternatives for the proposed project are evaluated in this Draft EIS: two in the city of Federal Way and one in the city of Kent. These alternatives are named the South 336th Street Alternative, South 344th Street Alternative, and Midway Landfill Alternative, respectively. The Sound Transit Board of Directors (the Board) identified the South 336th Street Alternative as the Preferred Alternative.

Depending on the alternatives and resulting environmental impacts, the project also includes minimization and mitigation measures that address potential impacts to visual and aesthetic resources, noise, and ecosystem resources.

### Dates of Construction and Opening

Final design and construction are currently scheduled to begin in 2024. Sound Transit expects the facility to open for operations between 2032 and 2037, depending on the alternative selected to be built. However, project realignment (Resolution R2021-05), influenced by COVID-19 and increased project cost estimates, may have an impact on the future project schedule. OMF South is a Tier 1 project, which means Sound Transit will continue to develop it for construction, and it will be managed under more ambitious completion targets.

### Environmental Process

This Draft Environmental Impact Statement (EIS) is a joint document issued under the National Environmental Policy Act (NEPA) [42 United States Code (USC) § 4321] and the Washington State Environmental Policy Act (SEPA) [Revised Code of Washington (RCW) 43.21.C.030 and Chapter 197-11 of the Washington Administrative Code (WAC)]. The Federal Transit Administration (FTA) is the lead agency under NEPA and Sound Transit is the lead agency under SEPA. This joint document supplements the SEPA Draft EIS Sound Transit prepared and issued in March 2021. The current document is a NEPA Draft EIS and a SEPA Supplemental Draft EIS (Draft EIS) that analyzes the environmental effects of the OMF South project as currently planned. As described in more detail below, comments received earlier by Sound Transit on the 2021 SEPA Draft EIS will be responded to in the Final EIS to be issued jointly by Sound Transit and FTA.

### NEPA Lead Agency

Federal Transit Administration  
915 2nd Avenue, Suite 3192  
Seattle, Washington 98174-1002  
<https://www.transit.dot.gov/about/regional-offices/region-10/region-10>

### Project Proponent and SEPA Lead Agency

Sound Transit  
Union Station  
401 S Jackson Street  
Seattle, Washington 98104  
[www.soundtransit.org](http://www.soundtransit.org)

### NEPA Responsible Official

Susan Fletcher, Acting Regional Administrator for Region 10  
Federal Transit Administration  
915 Second Avenue, Suite 3192  
Seattle, Washington 98174-1002

## **SEPA Responsible Official**

Perry Weinberg, Deputy Executive Director, Office of Environmental Affairs and Sustainability  
Sound Transit  
401 S Jackson Street  
Seattle, Washington 98104

## **Contacts for Additional Information**

### FTA

Justin Zweifel, Environmental Protection Specialist  
Federal Transit Administration  
915 Second Avenue, Suite 3192  
Seattle, Washington 98174-1002  
206-220-7538  
[justin.zweifel@dot.gov](mailto:justin.zweifel@dot.gov)

### Sound Transit

Erin Green, South Corridor Environmental Manager  
Sound Transit  
401 S Jackson Street  
Seattle, Washington 98104  
(206) 398-5464  
[erin.green@soundtransit.org](mailto:erin.green@soundtransit.org)

Sagar Ramachandra, Community Outreach Specialist  
Sound Transit  
401 S Jackson Street  
Seattle, Washington 98104  
(206) 398-5453  
[sagar.ramachandra@soundtransit.org](mailto:sagar.ramachandra@soundtransit.org)

## **Principal Contributors**

This NEPA Draft and SEPA Supplemental Draft EIS was prepared by Sound Transit in conjunction with the following firms: HDR, Inc.; Parametrix, Inc.; Aqua Terra Cultural Resource Consultants; Historical Research Associates, Inc.; Cross-Spectrum Acoustics, Inc.; ECONorthwest; EnviroIssues; and Two Hundred. See Appendix A1, List of Preparers, for a detailed list of preparers and the nature of their contributions.

## **Date of Issue**

September 22, 2023



# Commenting on the Draft Environmental Impact Statement

The comment period for this Draft EIS extends from September 22 to November 6, 2023. During the comment period, comments can be made online, by email, in writing, by phone, and at online public comment hearings. Comments that were provided previously on the 2021 SEPA Draft EIS do not need to be resubmitted. The Final EIS will respond to all substantive comments received from both the prior and the current comment periods.

How to comment:

- Online: [OMFSouth.participate.online](https://OMFSouth.participate.online)
- Email: [OMFSouthDEIS@soundtransit.org](mailto:OMFSouthDEIS@soundtransit.org)
- Mail: OMF South, c/o Erin Green  
Sound Transit  
401 S Jackson Street  
Seattle, WA 98104  
(comments must be postmarked by: November 6, 2023)
- Phone: (206) 257-2135
- Informational Meetings/Public Hearings: During the comment period, online and in-person informational meetings/public hearings will be held to share project information and obtain input from the community. A court reporter will record spoken statements made during the online comment hearing. The meetings will be held on:
  - Online: Thursday, October 19, 11:30 a.m. - 1:30 p.m.
    - The event can be accessed online through a Zoom link at the following web address:  
[OMFSouth.participate.online](https://OMFSouth.participate.online)
  - In person: Tuesday, October 24, 5:30 - 7:30 p.m.
    - Location: Federal Way Performing Arts Center  
31510 Pete von Reichbauer Way S, Federal Way

People with disabilities may request accommodation to participate by calling (800) 201-4900 / TTY Relay: 711 or email [Sagar.Ramachandra@soundtransit.org](mailto:Sagar.Ramachandra@soundtransit.org). Translation assistance for limited English proficiency persons, is available by calling Sound Transit at (800) 823-9230 / TTY Relay: 711.

## Anticipated or Potential Licenses, Permits, and Approvals

License, Permit or Approval	Issuing Agency
<b>Federal</b>	
Air Space Lease for Use of Interstate Right-of-Way (including NEPA documentation)	Federal Highway Administration
Clean Water Act, Section 404 (including NEPA documentation)	U.S. Army Corps of Engineers
Federal Endangered Species Act Consultation	U.S. Fish and Wildlife Service National Oceanic and Atmospheric Administration Fisheries Service
Federal Endangered Species Act Determination	Federal Transit Administration
Section 106 Determination	Federal Transit Administration
Section 4(f) Determination	Federal Transit Administration
NEPA Record of Decision	Federal Transit Administration
NEPA documentation for reconfiguration of towers and power lines	Bonneville Power Administration
NEPA documentation under the Comprehensive Environmental Response, Compensation, and Liability Act	U.S. Environmental Protection Agency
<b>State</b>	
Hydraulic Project Approval	Washington Department of Fish and Wildlife
Section 106 Review	Washington State Department of Archaeology and Historic Preservation
Temporary Modification of Water Quality Criteria	Washington State Department of Ecology
Underground Storage Tank Notification Requirement	Washington State Department of Ecology
Clean Water Act, Section 401 Water Quality Certification	Washington State Department of Ecology
Cleanup Action Plan Amendment and related Consent Decree	Washington State Department of Ecology
Temporary Construction Easement (SR 99, I-5)	Washington State Department of Transportation
Air Space Lease: State Transportation Routes and Interstate Right-of-Way (with Federal Highway Administration)	Washington State Department of Transportation
Land Acquisition	Washington State Department of Transportation

**Anticipated or Potential Licenses, Permits, and Approvals (continued)**

<b>License, Permit or Approval</b>	<b>Issuing Agency</b>
<b>Local</b>	
Street Use Permits	City of Federal Way or Kent
Construction Permits	City of Federal Way or Kent
Right-of-Way Permits	City of Federal Way or Kent
Environmental Critical Areas/Sensitive Areas Review	City of Federal Way or Kent
Compliance Review of National Pollutant Discharge Elimination System Stormwater Discharge requirements before discharge to local stormwater system	City of Federal Way or Kent
Development Permits, Including Conditional Use Permit or Land Use Code Amendment	City of Federal Way or Kent
Noise Variance	City of Federal Way or Kent
Street Vacations	City of Federal Way
<b>Other</b>	
Notification of Intent to Perform Demolition or Asbestos Removal	Puget Sound Clean Air Agency
Title V Operating Permit	Puget Sound Clean Air Agency
Pipeline and Utility Crossing Permits	Utility Providers
Utility Approvals: Easements and Use Agreements	Utility Providers

Note: Not all permits would be needed for every alternative.

**Next Steps**

Following publication of this Draft EIS and the close of the public comment period, FTA and Sound Transit will prepare a Final EIS that will analyze the Preferred Alternative along with the other Draft EIS alternatives. The Final EIS will respond to comments from Tribes, agencies, and the public on the 2021 SEPA Draft EIS and on this NEPA Draft/SEPA Supplemental Draft EIS. Following issuance of the Final EIS, the Board will select the alternative to be built. FTA will then issue a Record of Decision (ROD) describing the project Sound Transit would build along with measures to avoid, minimize, and mitigate environmental impacts.

Because SEPA requires that the Board's final decision on the project be informed by the Final EIS, the Final EIS must be issued independently of the ROD so that Sound Transit's decision can later be incorporated into the ROD. As a result of these regulatory requirements under SEPA, it will not be practical to issue a combined Final EIS and ROD, and they will be issued as separate documents.

## Related Documents

- Regional Transit Long-Range Plan Update (Sound Transit, December 2014)
- Regional Transit Long-Range Plan Update Final Supplemental Environmental Impact Statement (Sound Transit, November 2014)
- Federal Way Link Extension Final Environmental Impact Statement (Sound Transit, November 2016)
- Sound Transit 3: The Regional Transit System Plan for Central Puget Sound (Sound Transit, June 2016)
- Tacoma Dome Link Extension and Operations and Maintenance Facility South: Early Scoping Information Report (Sound Transit, March 2018)
- Tacoma Dome Link Extension and Operations and Maintenance Facility South: Early Scoping Summary Report (Sound Transit, June 2018)
- Operations and Maintenance Facility South: Alternatives Evaluation Technical Memorandum (Sound Transit, February 2019)
- Operations and Maintenance Facility South: Scoping Information Report (Sound Transit, February 2019)
- Operations and Maintenance Facility South: Scoping Summary Report (Sound Transit, May 2019)
- Operations and Maintenance Facility South: Draft Environmental Impact Statement (Sound Transit, March 2021). This is the document being supplemented by the current EIS.

## Cost and Availability of NEPA Draft/SEPA Supplemental Draft Environmental Impact Statement

The Draft EIS is available for public review in a variety of formats and locations. It is available on the Sound Transit website: [www.soundtransit.org/system-expansion/operations-maintenance-facility-south/documents](http://www.soundtransit.org/system-expansion/operations-maintenance-facility-south/documents). Paper copies are available for the cost listed below, which is below the cost of reproduction:

- Executive Summary - Free
- EIS - \$25.00
- Technical Reports and other appendices - \$15.00 each

To request paper copies or a flash drive of the documents, please contact Dominique Jones at (206) 689-4783 or email [dominique.jones@soundtransit.org](mailto:dominique.jones@soundtransit.org).

Paper copies are also available for review at the following locations:

- Federal Way City Hall, 33325 8th Avenue S, Federal Way
- Federal Way Library, 34200 1st Way S, Federal Way
- Federal Way 320th Library, 848 S 320th Street, Federal Way
- Federal Way Community Center, 876 S 333rd Street, Federal Way
- Kent Library, 212 2nd Avenue N, Kent
- Kent Commons Community Center, 525 4th Avenue N, Kent
- Kent City Hall, 220 4th Avenue S, Kent



# *Executive Summary*





## Introduction

The Central Puget Sound Regional Transit Authority (Sound Transit) proposes to build and operate a light rail operations and maintenance facility in its South Corridor (OMF South). The facility would meet agency needs for an expanded fleet of light rail vehicles (LRVs). OMF South would support the expansion of the Link light rail system as part of Sound Transit 3: The Regional Transit System Plan for Central Puget Sound (Sound Transit 3). Under Sound Transit 3, the light rail system in central Puget Sound would grow to 116 miles with over 80 stations. The system would expand north to Everett, south to Federal Way and Tacoma, east to Redmond, south Kirkland, and Issaquah, and west to West Seattle and Ballard by 2042 as shown in Figure ES-1.

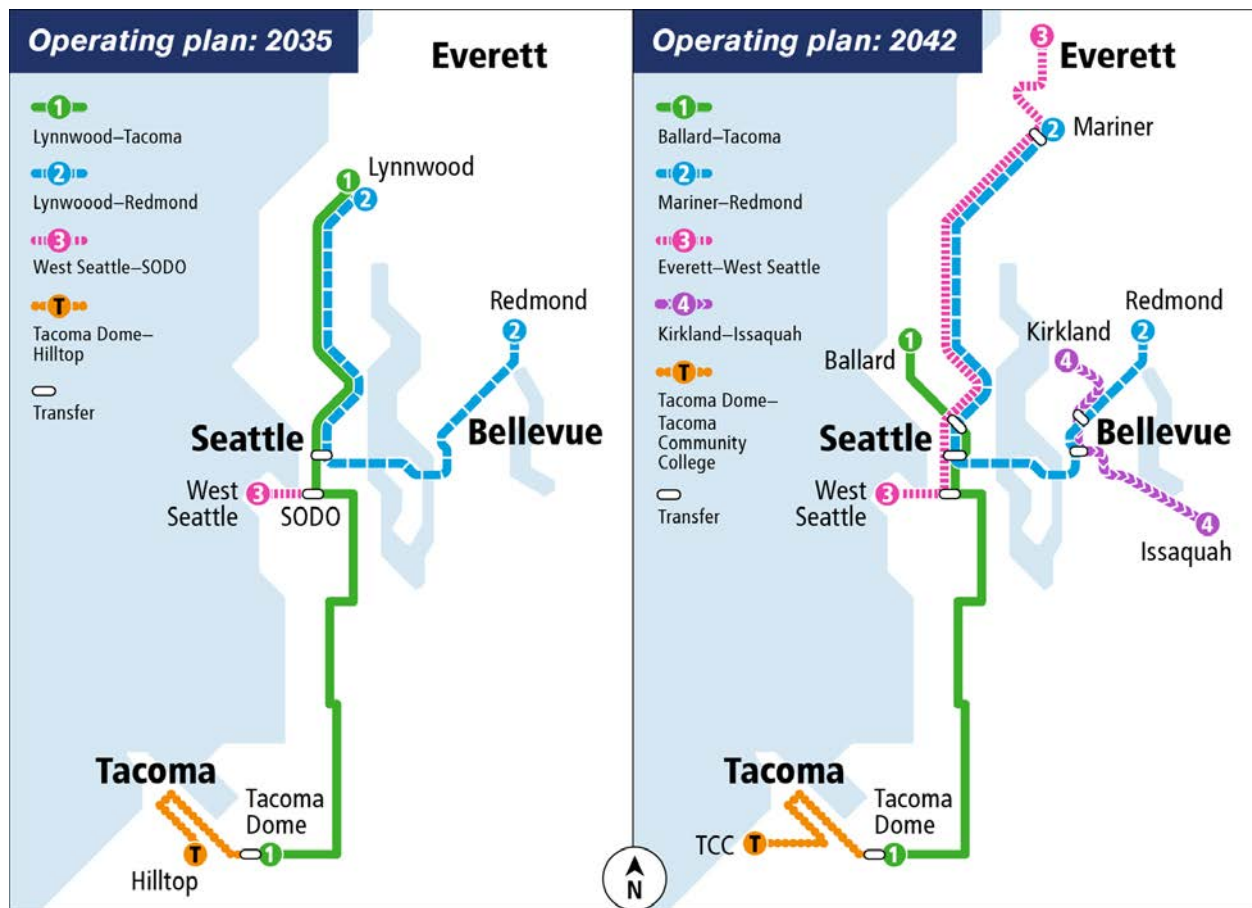
Sound Transit 3 calls for a total fleet of approximately 460 LRVs. In order to meet the system expansion goals, Sound Transit needs two additional operations and maintenance facilities: one each in the North and South Corridors. While OMF South would be located in the South Corridor, it would support Sound Transit's system-wide expansion by providing a facility to receive, test, commission, store, maintain, and deploy an increased LRV fleet for the entire light rail system.

## Environmental Planning and NEPA/SEPA Coordination

The environmental process for OMF South began in April 2018 with an early scoping period under the Washington State Environmental Policy Act (SEPA) to inform the alternatives development process. At that time, the environmental review process was conducted in compliance with SEPA only. Under SEPA, key environmental milestones were completed, including alternatives development as part of the scoping process and issuance of a SEPA Draft Environmental Impact Statement (EIS) in March 2021. After considering the SEPA Draft EIS and the comments received, the Sound Transit Board of Directors identified the South 336th Street Alternative as the Preferred Alternative for further evaluation in the SEPA Final EIS (Motion M2021-81, December 2021).

Subsequently, the design for the Preferred Alternative was advanced and modified in response to comments received during the 2021 SEPA Draft EIS comment period and a test track was added to the Preferred and South 344th Street alternatives to meet additional operational needs. Additionally, the Federal Transit Administration (FTA) and Sound Transit determined the need for an EIS under NEPA to support federal funding and approvals.

FTA is the lead federal agency under NEPA and Sound Transit is the lead agency under SEPA. FTA and Sound Transit prepared this document as a Draft EIS under NEPA and a Supplemental Draft EIS under SEPA. It evaluates three build alternatives that meet the purpose and need for the proposed project, as described below. These three alternatives are the South 336th Street (Preferred) Alternative in Federal Way, the South 344th Street Alternative in Federal Way, and the Midway Landfill Alternative in Kent, shown in Figure ES-2.



**Figure ES-1: Link Light Rail System Expansion**

The EIS also evaluates a No-Build Alternative, which considers how the transit system would operate if the proposed project were not built. The No-Build Alternative provides a baseline against which to measure the impacts of the build alternatives.

The discussion that follows states the proposed project's purpose and need, compares the levels of impact that would result from each build alternative, and describes design features and measures that would avoid, reduce, or mitigate impacts. Sound Transit's goal is to preserve and promote a healthy and sustainable environment by minimizing adverse impacts to people and the natural and built environments. The methodologies used to evaluate impacts are generally described in the introduction to each subsection of Chapter 3 in the Draft EIS.

Final design and construction of the project are currently scheduled to begin in 2024. Sound Transit expects the facility could be open for operation between 2032 and 2037, depending on the alternative selected to be built. However, this schedule could change, resulting in a delayed opening or the construction of OMF South in phases to reach full operational capacity over time. See Figure ES-11 for more information about project milestones.

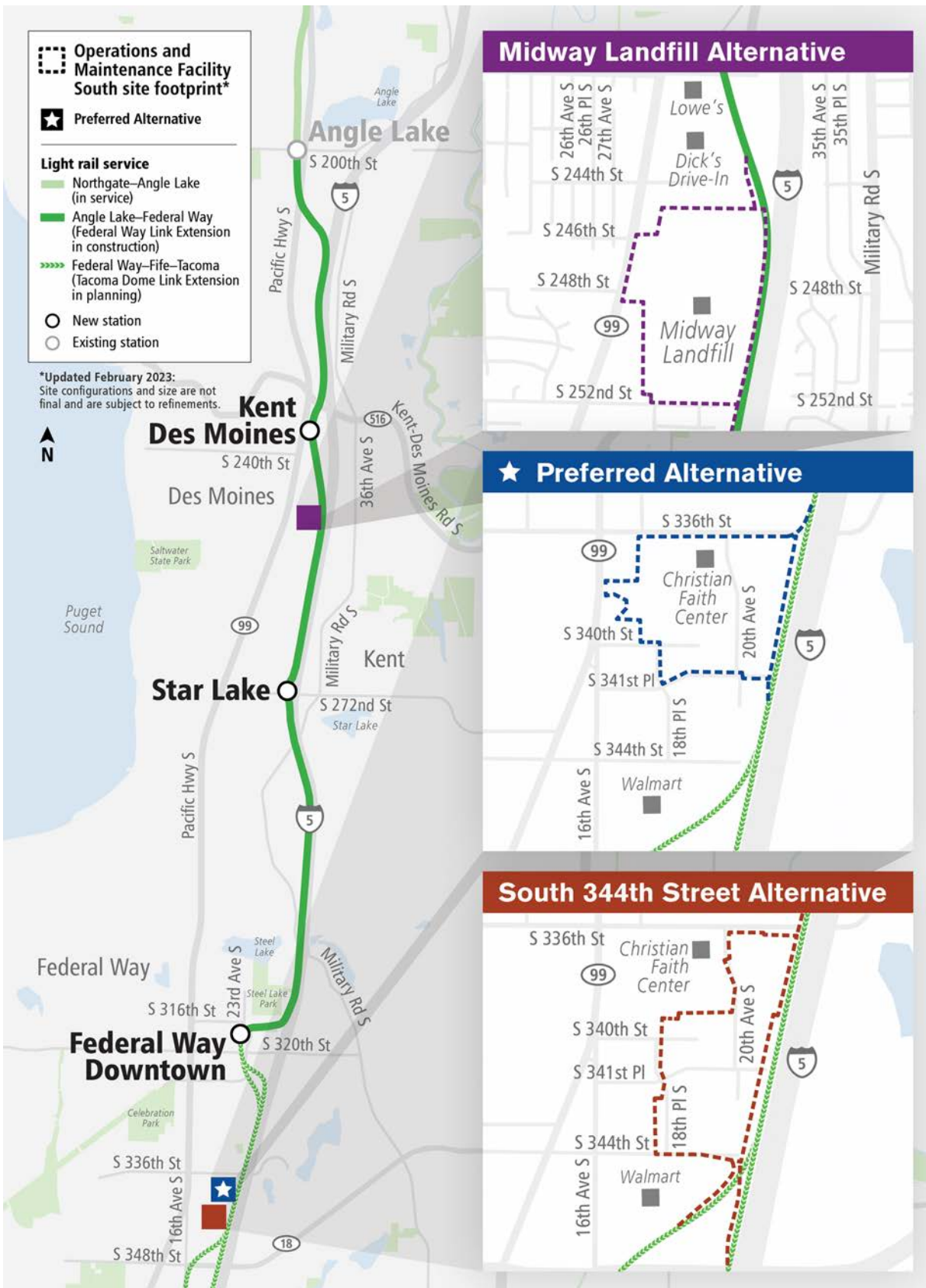


Figure ES-2: Project Alternatives

### **ES.1 Purpose and Need**

The purpose of the OMF South project is to:

- Provide a facility with the capacity to receive, test, commission, store, maintain, and deploy vehicles to support the intended level of service for the system-wide light rail expansion.
- Support efficient and reliable light rail service that minimizes system operating costs.
- Support and connect efficiently to the regional system and be technically and financially feasible to build, operate, and maintain, consistent with the Sound Transit 3 Plan and the Sound Transit Regional Transit Long-Range Plan.

The project is needed because:

- The current regional system lacks a facility with sufficient capacity and suitable location to support the efficient and reliable long-term operations for system-wide light rail expansion, including the next phase of expansion in King and Pierce counties.
- New light rail maintenance and storage capacity needs to be available with sufficient time to accept delivery of and commission new vehicles to meet the expansion needs outlined in Sound Transit 3 and to store existing vehicles while the new vehicles are tested and prepared.

The OMF South project is necessary to support the addition of a minimum of 144 LRVs as part of the Sound Transit 3 system expansion. The facility includes functions that support the entire Link light rail system, such as receiving, testing, and commissioning new LRVs. In addition, OMF South would include Maintenance of Way (MOW) facilities and a Link System-Wide Storage building to receive and store vehicle parts and components, tracks and components, and station parts and components.

### **ES.2 Alternatives Considered**

The OMF South alternatives underwent an extensive evaluation process prior to their identification for study in the EIS. Beginning in early 2018, Sound Transit conducted early scoping under SEPA, followed by alternatives development, including site identification, prescreening, and alternatives evaluation. In early 2019, six alternatives were presented to the public during the SEPA scoping period, and in May 2019 the Board identified three alternatives for evaluation in the SEPA Draft EIS. These three alternatives were the South 336th Street Alternative in Federal Way, the South 344th Street Alternative in Federal Way, and the Midway Landfill Alternative in Kent.

The SEPA Draft EIS was published in March 2021 and had a public comment period extending from March 5 to April 19, 2021. After considering the SEPA Draft EIS and the comments received from Tribes, agencies, and the public, the Board identified the South 336th Street Alternative as the Preferred Alternative for further study in the SEPA Final EIS (Motion M2021-81; December 2021).

## No-Build Alternative

The No-Build Alternative evaluates how the transit system would operate if the proposed project were not built. It assumes that the other light rail system improvements listed in Sound Transit 3 would be built, including extensions to West Seattle, Ballard, Issaquah, and Tacoma. The No-Build Alternative also assumes that the new North Corridor OMF would be constructed. Under the target schedule for Sound Transit's System Expansion Plan, each of these projects would be constructed and operational by 2042.

The analysis of the No-Build Alternative is based on the expected conditions in 2042, which is the future design year for the project. Due to the realigned capital program (Resolution R2021-05, August 2021) completion of some Sound Transit 3 projects may be delayed past 2042; however, 2042 provides a common future analysis year for ridership forecasting, air, noise, transportation, and other environmental elements on all Sound Transit 3 projects.

Under the No-Build Alternative, impacts from the Sound Transit 3 projects listed above, including Federal Way Link Extension (FWLE), Tacoma Dome Link Extension (TDLE), West Seattle Link Extension (WSLE), and other reasonably foreseeable future actions by others would still occur. As the FWLE and TDLE projects are within the study areas for the OMF South project alternatives, there are impacts that may be similar to or that overlap with those of OMF South.

FWLE is under construction and is planned to open for service in 2025/2026. The impacts of FWLE have been addressed in the Federal Way Link Extension Final Environmental Impact Statement (Sound Transit 2016a). TDLE is currently undergoing environmental review under both NEPA and SEPA by FTA and Sound Transit. The Tacoma Dome Link Extension Draft Environmental Impact Statement is expected to be published in mid-2024, with service anticipated to begin in 2035.

The TDLE mainline tracks south of Federal Way Downtown Station would also serve as part of connecting mainline tracks to OMF South, depending on which OMF South build alternative is selected. In those instances, impacts from the mainline tracks would be primarily the same under both the No-Build and build alternatives, although the timing of those impacts would be different. TDLE impacts will be further detailed in the separate Tacoma Dome Link Extension Draft Environmental Impact Statement.

The No-Build Alternative assumes Sound Transit's light rail storage and maintenance facilities (including OMF North) would support a maximum light rail fleet size of about 352 LRVs, which is fewer than the approximately 460 LRVs needed to operate the system at the planned service levels of Sound Transit 3. As a result, light rail operations would be less efficient than they would otherwise be with OMF South, and Sound Transit would not be able to meet expected ridership demand. The No-Build Alternative would fail to meet the purpose and need

### Affordable and Target Schedules

Due to steeply rising real estate prices and other construction expenses, Sound Transit projects currently in early planning and design, including OMF South, are seeing cost estimate increases. To ensure that funding remains available to complete all voter-approved projects, the Sound Transit Board conducted a "realignment" process that established the following two schedules:

**Affordable Schedule:** a schedule that is affordable, using current financial projections and cost estimates to set the general order in which projects will advance. This "affordable" schedule established an approach to prioritize, fund, and manage program work over time (Resolution 2021-05).

**Target Schedule:** schedule for priority projects, as close to Sound Transit 3 Plan schedules as possible, reliant upon reductions in the affordability gap through cost savings and additional revenue.



## Executive Summary

of the project and could indirectly result in worse traffic congestion and greater vehicle emissions than would otherwise occur under the build alternatives.

### Build Alternatives

Build alternatives evaluated in this document include the South 336th Street Alternative (the Preferred Alternative), the South 344th Street Alternative, and the Midway Landfill Alternative. The basic design and function of the OMF South site would be the same for all alternatives. The primary differences between the three build alternatives include their geographic location and that the Preferred and South 344th Street alternatives include mainline connecting tracks and a test track.

Several separate operational functions are proposed for the OMF South site. These functions would be the same for all build alternatives. Each alternative would include a 2-story OMF building, a 1-story MOW building, a 1-story Link System-Wide Storage building, storage tracks, yard areas, and parking spaces (including accessible parking) for employees, visitors, and nonrevenue Sound Transit vehicles. The site would include space for receiving, testing, commissioning, storing, maintaining, and deploying a minimum of 144 LRVs in addition to housing administrative and operational functions, such as serving as a report base for operators. OMF South would include administration, workshop, and storage space

for MOW and Facilities staff and functions. There would be a training track that would include all the track installation configurations found in the Link system. Currently, storage is provided at existing OMF sites and at locations outside of these sites. OMF South's Link System-Wide Storage building is intended to centralize the receiving, distribution and storage needs and would minimize the need for storage in locations outside of currently owned properties.

The OMF South facility needs to connect to the Link light rail system via an operating mainline. The Preferred and South 344th Street alternatives are approximately 1 mile south of the FWLE terminus at the Federal Way Downtown Station and would require construction of mainline tracks to connect the OMF South facility to FWLE. The Midway Landfill Alternative is adjacent to the FWLE alignment and would connect directly to the mainline tracks.

After publication of the 2021 SEPA Draft EIS, Sound Transit updated design elements of the alternatives to reflect public comments on the SEPA Draft EIS, coordination with local jurisdictions, and operational needs. Design updates are described in Chapter 2, Alternatives Considered, of the Draft EIS.

#### Track Types

**Mainline Tracks:** Tracks that are used for LRVs or are the principal artery of a system to which other components (such as operation and maintenance facilities) are connected. Mainline tracks can be elevated (on a structure) or at-grade (on the ground surface).

**Tail Track:** A track at the end of the mainline that can be used for storing a train.

**Test Track:** A dedicated track to allow LRVs to be tested without using the mainline tracks.

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

**Training Track:** A short length of track located within the OMF site that includes all the track installation configurations found in the Link system.

*For the purposes of analysis, mainline tracks, tail tracks, and the test track are included with the mainline; lead tracks and the training track are included with the OMF site.*

***Design Updates to the Preferred and South 344th Street Alternatives***

The project designs for the Preferred Alternative and South 344th Street alternatives were advanced in response to comments received during the 2021 SEPA Draft EIS comment period and identification of additional operational needs, which include:

- Addition of a third track parallel to the mainline tracks to serve as a dedicated test track to test new and rehabilitated LRVs to ensure their safety, compliance with Sound Transit's requirements, and readiness to carry passengers. For the Midway Landfill Alternative, this testing would continue to be conducted on the mainline tracks.

The design of the Preferred Alternative has been updated to include the following:

- The main site entrance has been moved from State Route (SR) 99 to S 340th Street.
- 18th Place S has been extended to connect S 340th Street and S 336th Street as a replacement for the removal of 20th Avenue S. The extended street would include a bike/pedestrian trail to provide public amenities.
- 21st Avenue S has been extended to connect to S 344th Street.
- Frontage improvements (including road widening) have been added on the south side of S 336th Street to meet city requirements.
- The OMF South site has been expanded to the southwest to provide more space for buildings and yard area.
- The OMF South site and internal track configuration has been modified to a parallelogram to allow for a wider stream and wetland corridor on the east side of the OMF, between the site and Interstate 5 (I-5).
- Existing culverts that carry the West Fork Hylebos Creek Tributary under S 336th Street and the East Fork Hylebos Creek Tributary under S 344th Street are planned to be upgraded, removed, and/or relocated to meet state fish passage requirements.





## **Preferred Alternative**

The Preferred Alternative is located in Federal Way between S 336th Street and S 341st Place and between I-5 and SR 99. The Preferred Alternative represents the Board's preference based on information currently available. Identifying a Preferred Alternative assists the public in reviewing the environmental documents. The selection of the alternative to be built will be made by the Board after the Final EIS is issued.

### ***Mainline Tracks***

The Preferred Alternative would require approximately 1.5 miles of connecting mainline tracks from the southern terminus of FWLE (see Figure ES-3). After construction of TDLE, which is currently undergoing a separate environmental review, LRVs providing passenger service would operate on these mainline tracks.

There are two alignment options for this length of mainline tracks: the 40 mph Alignment and 55 mph Design Option, which differ near their connection to the FWLE terminus. The mainline tracks would be elevated, with north-bound and south-bound tracks. The tracks would extend south approximately 1,000 feet past the southeast corner of the OMF South site, at that point serving as tail tracks. Until the TDLE mainline tracks are extended to the south, these elevated tail tracks would be used to allow trains to access the Link system from the OMF South if the northern lead tracks were out of service.

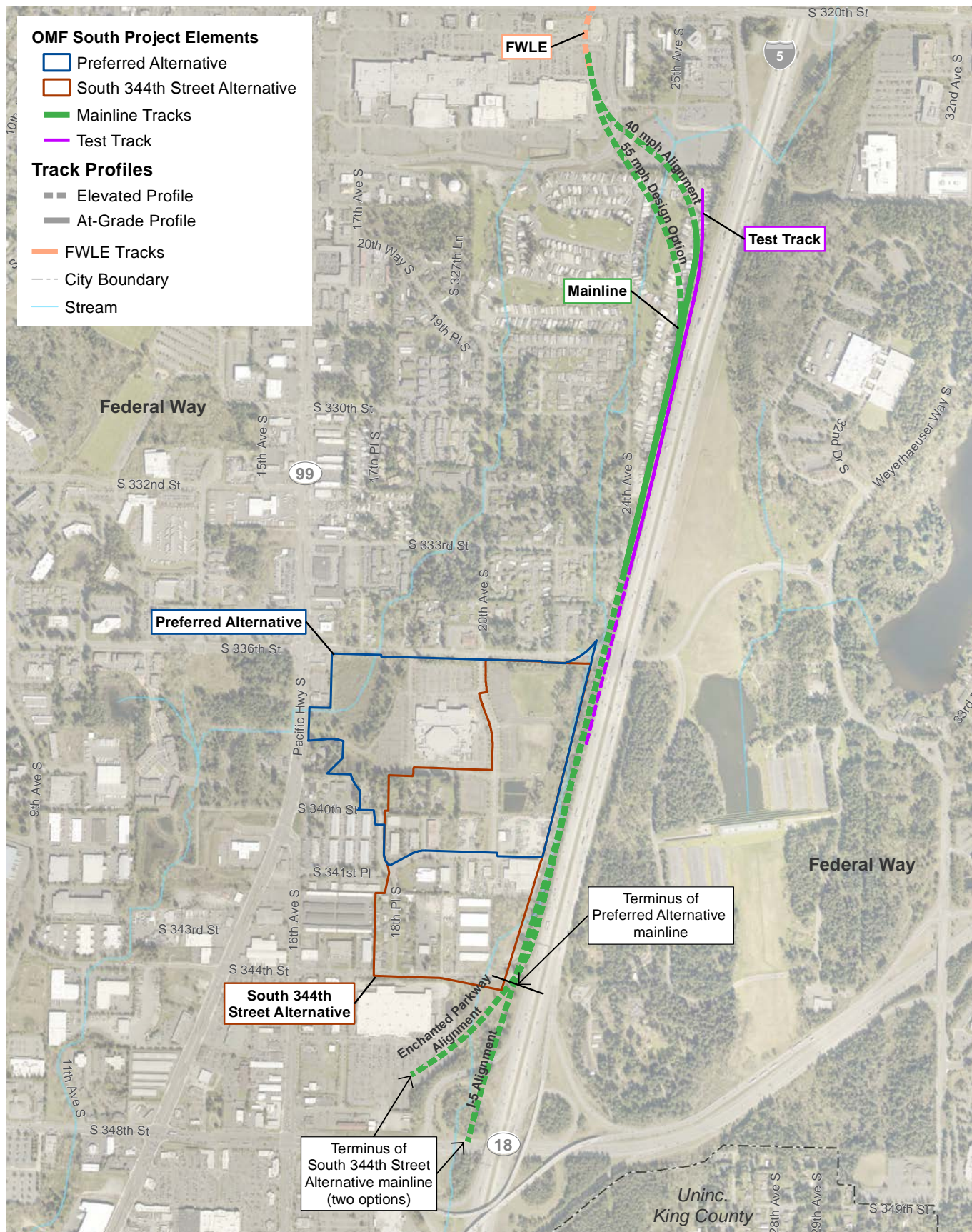
A test track would run parallel to the east side of the mainline tracks from S 324th Street to just south of S 336th Street – approximately 0.9 mile. The test track would be at the same elevation as the mainline tracks, with the exception of the north end of the track near S 324th Street, where the mainline tracks would be elevated, and the test track would be at grade.

### ***OMF South Site***

The Preferred Alternative site footprint is approximately 66 acres, which includes three primary buildings, storage tracks, a training track, yard areas, and approximately 480 parking spaces. The yard area would be approximately 6.7 acres. Figure ES-4 is an aerial view with a conceptual layout. The Preferred Alternative would also include extensions of 18th Place S and 21st Avenue S.

In addition to the mainline tracks, the site would also require lead tracks to access the rail system. Elevated lead tracks would leave the northeast corner of the site and be approximately 800 feet long. Similarly, a pair of elevated lead tracks approximately 1,000 feet long would leave the southeast corner of the site to access the mainline tail tracks.





### Figure ES-3: Mainline Track Options



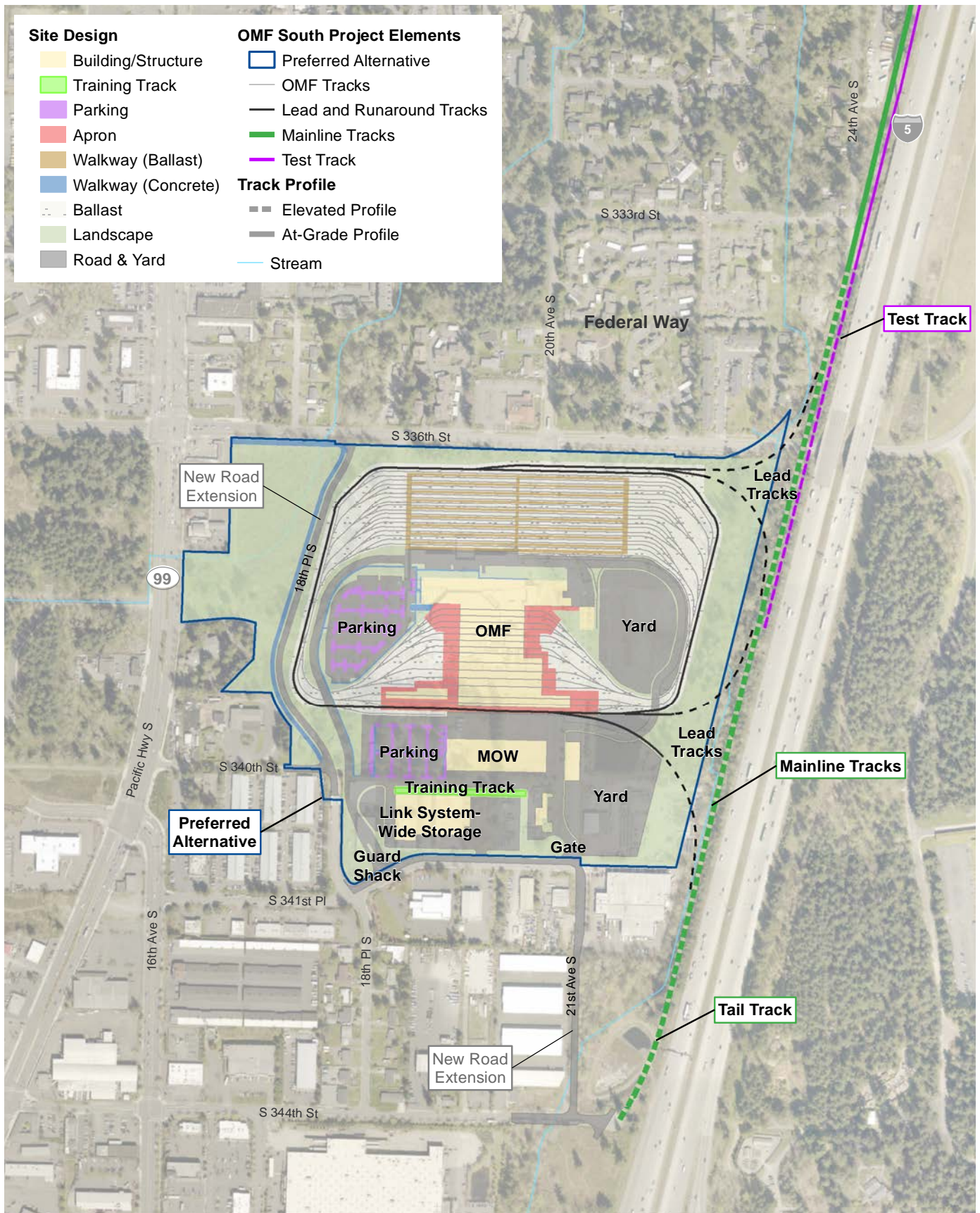


Figure ES-4: Conceptual Layout: Preferred Alternative

### **South 344th Street Alternative**

The South 344th Street Alternative is located in Federal Way between S 336th Street and S 344th Street and between I-5 and 18th Place S.

#### ***Mainline Tracks***

The South 344th Street Alternative would require approximately 1.8 miles of connecting mainline tracks from the southern terminus of the FWLE to the site (see Figure ES-3). As with the Preferred Alternative, these tracks would serve as future mainline tracks for TDLE and would follow the same alignment. The test track and mainline track alignment options are the same as described for the Preferred Alternative in the section above and shown in Figure ES-5.

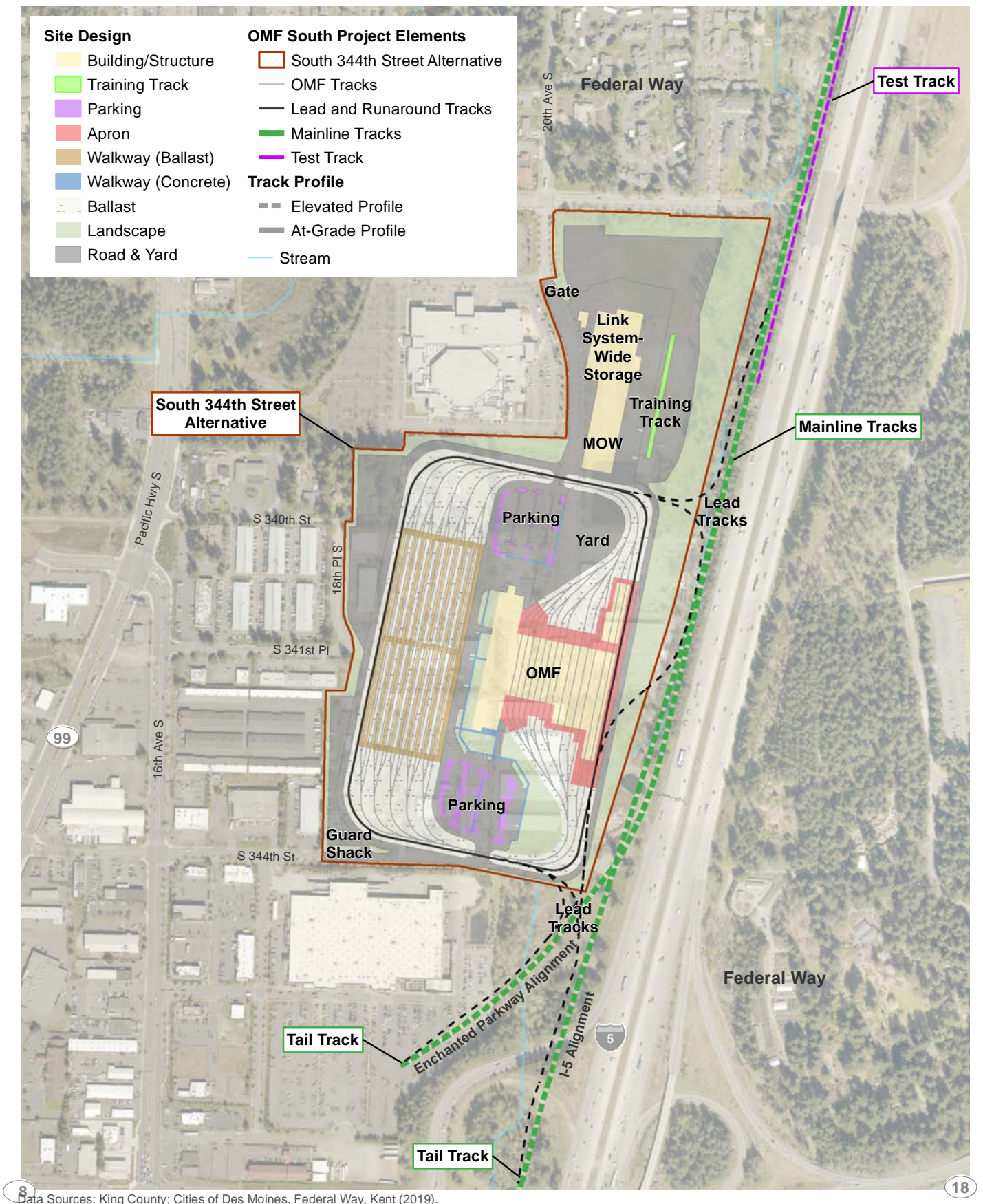
As with the Preferred Alternative, the mainline tracks would extend past the southeast corner of the OMF South site to serve as tail tracks. Until the TDLE mainline tracks are extended to the south, these tail tracks would be used to allow trains to access the Link system if the northern lead tracks are out of service. There are two options for the South 344th Street Alternative tail tracks that follow the design alternatives for TDLE: the Enchanted Parkway alignment and the I-5 alignment. Both options are completely elevated, with the Enchanted Parkway alignment extending approximately 1,100 feet south of the site and the I-5 alignment extending approximately 1,400 feet south of the site.

#### ***OMF South Site***

The South 344th Street Alternative site footprint is approximately 64 acres, which includes buildings, storage tracks, a training track, yard areas, and approximately 480 parking spaces. The yard area would be approximately 8.2 acres. Figure ES-5 is an aerial view with a conceptual layout.

In addition to the mainline connecting tracks, the site would also require lead tracks to access the rail system. The elevated lead tracks would leave the northeast corner of the site and be approximately 1,100 feet long. Similarly, a set of approximately 1,600 feet of elevated lead tracks would leave the southeast corner of the site to connect to the mainline tail tracks for the Enchanted Parkway alignment; approximately 1,300 feet of elevated lead tracks would be needed to connect the site to the mainline tail tracks for the I-5 alignment.





Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2019).

**Figure ES-5: Conceptual Layout: South 344th Street Alternative**

### **Midway Landfill Alternative**

The Midway Landfill Alternative is located in Kent between S 246th Street and S 252nd Street and between I-5 and SR 99.

#### ***Mainline***

Because the site would be located adjacent to FWLE, which is scheduled to open as an active light rail line in 2025/2026, there would be no need to build additional mainline tracks.

#### ***OMF South Site***

The site footprint of the Midway Landfill Alternative is approximately 68 acres, which includes buildings, storage tracks, a training track, yard areas, and approximately 480 parking spaces. The yard area encompasses approximately 8.3 acres. Figure ES-6 is an aerial view with a conceptual site layout.

The Midway Landfill Alternative would connect to the mainline tracks via a series of lead tracks between the Kent/Des Moines and South 272nd Street stations. An approximately 3,200 foot long lead track would run parallel to the FWLE mainline tracks, and five shorter (approximately 400 foot-long) lead tracks would connect it to the site. The lead track parallel to FWLE would be elevated for approximately 35 percent of its length; the shorter lead tracks would be primarily at grade.

#### ***Midway Landfill Alternative Subsurface Construction Design Options***

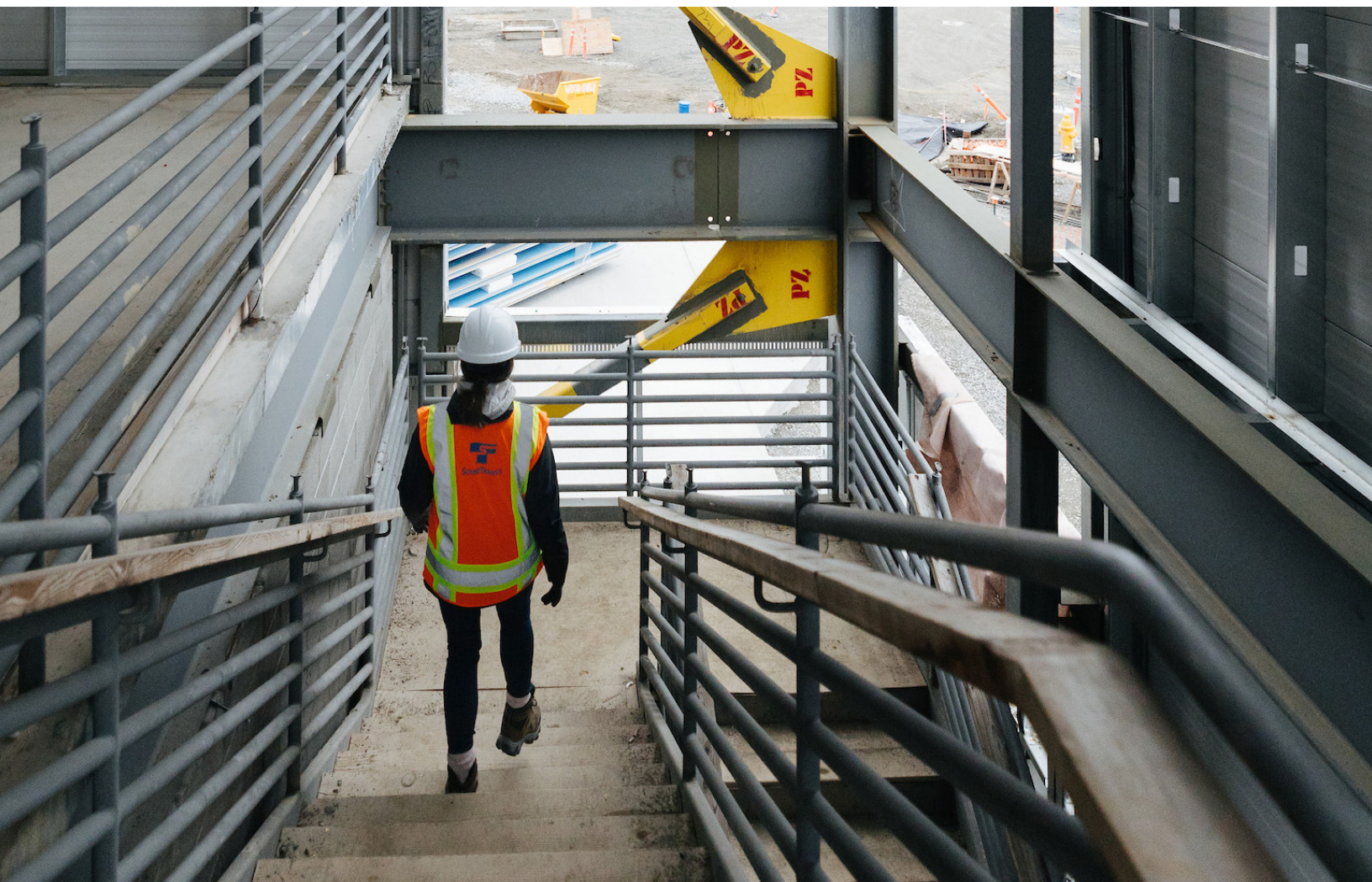
The Midway Landfill site is a publicly owned, mostly vacant site located along the FWLE. However, there are unique risks involved with building on a former landfill that is under active Superfund site monitoring and reporting requirements. A Superfund site is a location contaminated by hazardous waste that has been designated by the U.S. Environmental Protection Agency (EPA) for management and cleanup. In addition, waste in the landfill is settling at different rates across the site, which poses long-term operations and maintenance concerns. After a series of workshops and further analysis to address this settlement concern, Sound Transit developed three subsurface construction design options for building an OMF on the landfill: Platform, Hybrid, and Full Excavation.

Under the Platform subsurface construction design option, OMF South would be built on a 3.5-foot-thick concrete slab platform supported on approximately 700 concrete-filled drilled shafts. The drilled shafts would be 10 feet in diameter, distributed on a 35-foot by 70-foot grid under the buildings, track, and drainage vault area. Average shaft depths would range from 120 feet to 180 feet below finished grade. Due to the number of drilled shafts, the entire soil and geomembrane cap system that overlays the landfill would be removed then replaced after the shafts had been installed. The platform would then be constructed on top of the new cap, which would be designed to meet the regulatory requirements for the remedial controls to contain the landfill waste and hazardous emissions and to prevent precipitation from reaching the buried refuse where it could contaminate groundwater.

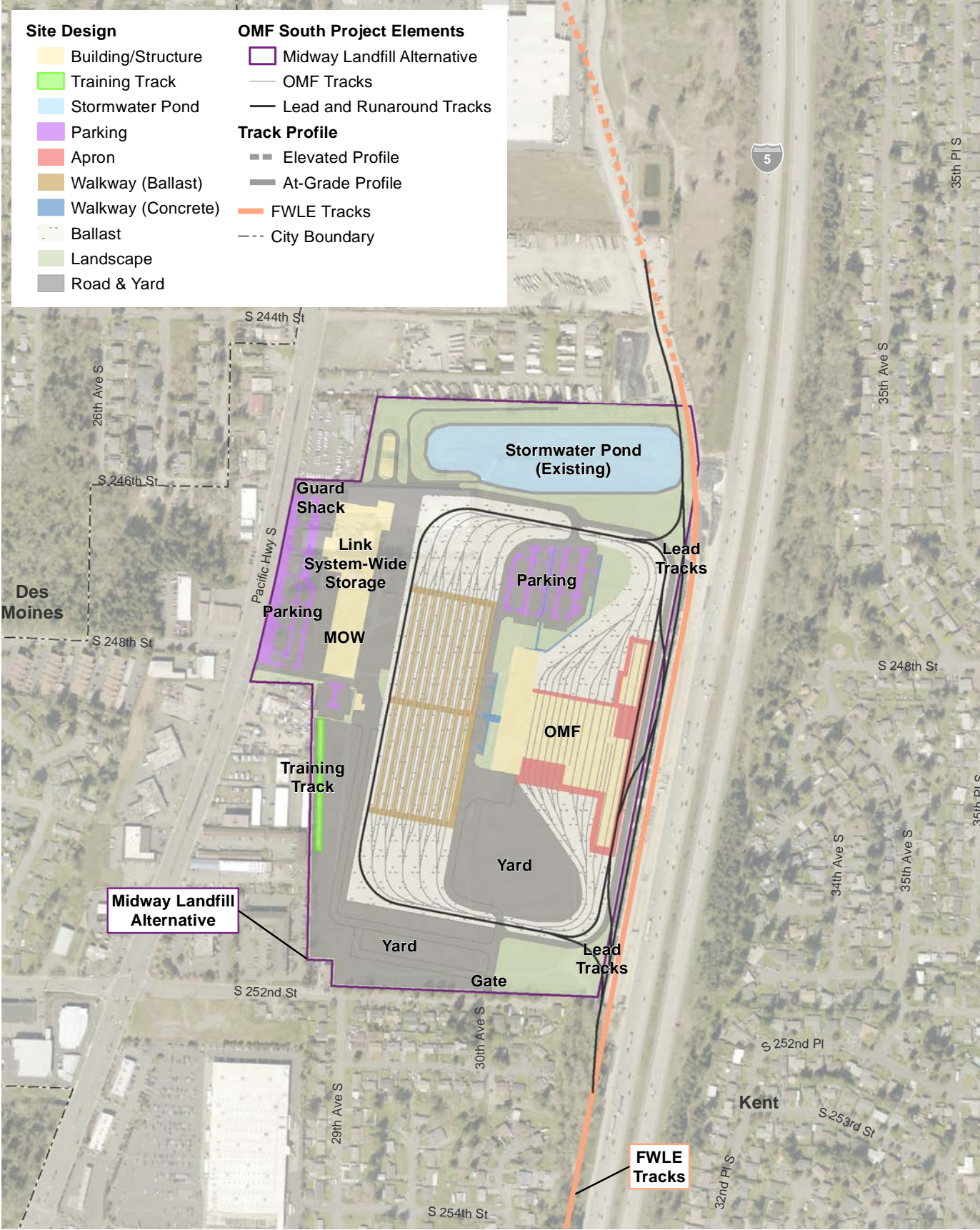


Under the Hybrid subsurface construction design option, the entire landfill cap system would also be removed and replaced. Approximately 4.3 million cubic yards of loose landfill material beneath the cap would be excavated, and the remaining fill would undergo a ground improvement process called deep dynamic compaction to prepare the site for construction. Excavated material would be screened to determine whether it was suitable for reuse. A 1-foot-thick concrete slab over a 3-foot-thick beam system would be built to support facilities sensitive to settlement, including tracks, parking, and roads. Approximately 110 concrete-filled drilled shafts would provide additional support where needed under buildings. Approximately 1.2 million cubic yards of suitable soil would need to be brought to the site.

The Full Excavation subsurface construction design option would completely excavate the landfill, screen excavated material for reuse, and backfill with soil that the OMF would be built on. The landfill cap system would also be removed and replaced to cover the reused landfill material. Excavation of the landfill would produce approximately 4.9 million cubic yards of loose material consisting of solid waste and soil, of which approximately 3 million cubic yards would be hauled off site. The hauled off material would be the equivalent of about 920 Olympic-sized swimming pools. Approximately 1.6 million cubic yards of suitable soil would be imported to the site.







### Figure ES-6: Conceptual Layout: Midway Landfill Alternative

## ***Construction Approach for the Build Alternatives***

Major construction activities would start with demolishing existing buildings, relocating utilities, and grading and excavating the site, which may include construction of retaining walls. The next phase of construction would include installing track work and electrical systems (overhead catenary system power lines, traction power substations [TPSS], etc.) and constructing the OMF South buildings.

Typical construction would occur on a 5- to 6-day workweek schedule, primarily during daytime hours. In some situations (such as when street detours are involved or when daytime construction periods need to be shortened to reduce impacts), additional shifts, all-week, nighttime, or 24-hour construction activities could be necessary.

## ***Comparative Cost Estimates***

The comparative cost estimate is presented in ranges in Table ES-1. Cost estimates at this early phase of project development (approximately 10 percent design) are for comparative purposes only using a “Unit Cost Library” assembly methodology for cost estimating and do not represent the project budget. Sound Transit has developed high-level conceptual cost estimates for all alternatives evaluated in the Draft EIS. Sound Transit establishes a project budget at approximately 60 percent design when a project is baselined prior to the start of construction.

The current level of project design includes uncertainties regarding the project scope, engineering data, mitigation requirements, schedule, and project delivery methods. Therefore, these conceptual estimates focus on the project elements that are defined consistently across alternatives, that capture the essential physical features of alternatives, and that help distinguish alternatives from one another.

A more detailed estimate, applying a “bottoms up” cost methodology will be developed. Early preliminary information from this methodology indicates cost growth attributable to the change in estimating methodology, inflation factors, market conditions, design development, and scoping changes. Capital projects across the Puget Sound region are experiencing the effects of inflationary factors including increases in the cost of materials and labor. Sound Transit anticipates that construction costs will continue to escalate over the course of project development and final design. Each project estimate throughout the various design phases will therefore need to be evaluated and adjusted specifically considering current market conditions. This market conditions adjustment is independent of escalation and will fluctuate with economics and the value of any given project considered by the marketplace.

Estimates for annual operating costs include long-term expenses to maintain the facility, as well as operating costs associated with trains deploying from and returning to the OMF each day. Additionally, annual mainline track maintenance expenses for the Preferred and South 344th Street alternatives would apply until TDLE is completed.

### ES.3 Comparison of Alternatives

Table ES-1 below summarizes key characteristics and long-term impacts (unless otherwise specified) that differentiate the build alternatives. There would be additional temporary impacts to these elements of the environment during construction that are not reflected in this table. Both long-term and construction impacts are discussed in detail in the Draft EIS.

**Table ES-1: Key Characteristics and Impacts of the Build Alternatives**

Key Characteristics and Impacts	Preferred Alternative <sup>1</sup>	South 344th Street Alternative <sup>1</sup>	Midway Landfill Alternative <sup>2</sup>
<b>Comparative Cost Estimate</b> (In 2023 dollars) <sup>3, 4</sup>			
Mainline <sup>5</sup>	\$356 M to \$449 M	\$528 M to \$695 M	N/A
OMF <sup>6</sup>	\$1.5 B to \$1.8 B	\$1.5 B to \$1.9 B	\$2.1 B to \$3.5 B
<b>Total</b>	<b>\$1.9 B to \$2.2 B</b>	<b>\$2.0 B to \$2.6 B</b>	<b>\$2.1 B to \$3.5 B</b>
<b>Annual Operating Cost Estimate</b> (In 2023 dollars) <sup>4</sup>			
Mainline <sup>5</sup>	\$1.2 M	\$1.5 M	N/A
OMF	\$12 M	\$12 M	\$13 M
<b>Total</b>	<b>\$13.2 M</b>	<b>\$13.5 M</b>	<b>\$13 M</b>
<b>Final Design/Construction Duration<sup>7</sup></b>			
<b>Complete Facility</b>	<b>4y 8m</b>	<b>4y 9m</b>	<b>7y 6m to 10y</b>
<b>Transportation</b>			
Maximum anticipated daily truck trips during construction			
Mainline <sup>5</sup>	120	120	N/A
OMF Site <sup>8</sup>	45	77	71 to 564
<b>Total</b>	<b>165</b>	<b>197</b>	<b>71 to 564</b>

Notes:

- <sup>1</sup> Ranges for the Preferred and South 344th Street alternatives reflect the two mainline alignment options (40 mph Alignment and 55 mph Design Option). For the purposes of analysis, the mainline also includes the test track and tail tracks.
- <sup>2</sup> Ranges for the Midway Landfill Alternative reflect the three subsurface construction design options (Platform, Hybrid, and Full Excavation).
- <sup>3</sup> Comparative cost estimates include property acquisition, relocation assistance, final design, and construction.
- <sup>4</sup> The unit costs used to develop the cost estimates are based on costs from 2023. They do not account for future increases due to inflation.
- <sup>5</sup> The mainline would be constructed regardless of the alternative selected to build. Under the Midway Landfill Alternative, it would be constructed later in time as part of the TDLE project.
- <sup>6</sup> There is potential increased cost risk due to the nature of the uncertain subsurface conditions at the landfill and the low level of design (10 percent) and subsurface exploration at this phase.
- <sup>7</sup> Construction duration totals reflect the overlap of some site preparation and facility construction activities and rounding of months.
- <sup>8</sup> Estimates represent a worst-case scenario during the site preparation phase and not a daily average of truck trips over the entire construction period.

**Table ES-1: Key Characteristics and Impacts of the Build Alternatives (continued)**

Key Characteristics and Impacts	Preferred Alternative <sup>1</sup>	South 344th Street Alternative <sup>1</sup>	Midway Landfill Alternative <sup>2</sup>
<b>Acquisitions, Displacements, and Relocations</b>			
Parcels affected			
Mainline <sup>5</sup>	7	13	N/A
OMF Site	30	51	47
<b>Total</b>	<b>37</b>	<b>64</b>	<b>47</b>
Business displacements			
Mainline <sup>5</sup>	0	0	N/A
OMF Site	6	11 <sup>9</sup>	4
<b>Total</b>	<b>6</b>	<b>11</b>	<b>4</b>
Residential displacements			
Mainline <sup>5</sup>	71 to 77	71 to 77	N/A
OMF Site	15	20	0
<b>Total</b>	<b>86 to 92</b>	<b>91 to 97</b>	<b>0</b>
<b>Land Use</b>			
Acres of land converted to transportation use			
Mainline <sup>5</sup>	36	40	N/A
OMF Site	67	57	71
<b>Total</b>	<b>103</b>	<b>97</b>	<b>71</b>
<b>Economics</b>			
Estimated number of employees displaced <sup>10</sup>			
Mainline <sup>5</sup>	0	0	N/A
OMF Site	126	207	43
<b>Total</b>	<b>126</b>	<b>207</b>	<b>43</b>
<b>Social Resources, Community Facilities, and Neighborhoods</b>			
Displaced social and community resources	1 church and associated daycare center, 1 school, 1 in-home daycare center	4 churches	None
<b>Visual and Aesthetics</b>			
Level of visual impact			
Mainline <sup>5</sup>	High	High	N/A
OMF Site	Medium	Medium	Medium

## Notes:

- 1 Ranges for the Preferred and South 344th Street alternatives reflect the two mainline alignment options (40 mph Alignment and 55 mph Design Option). For the purposes of analysis, the mainline also includes the test track and tail tracks.
- 2 Ranges for the Midway Landfill Alternative reflect the three subsurface construction design options (Platform, Hybrid, and Full Excavation).
- 5 The mainline would be constructed regardless of the alternative selected to build. Under the Midway Landfill Alternative, it would be constructed later in time as part of the TDLE project.
- 9 Includes GarageTown, comprised of approximately 60 owners.
- 10 The number of displaced employees is an estimation based on the business building size and the type of business activity and not on an actual survey of businesses.



**Table ES-1: Key Characteristics and Impacts of the Build Alternatives (continued)**

Key Characteristics and Impacts	Preferred Alternative <sup>1</sup>	South 344th Street Alternative <sup>1</sup>	Midway Landfill Alternative <sup>2</sup>
<b>Noise</b>			
Sensitive receptors affected by noise			
Mainline <sup>5</sup>	0 to 4	0 to 4	N/A
OMF Site	0	0	0
<b>Total</b>	<b>0 to 4</b>	<b>0 to 4</b>	<b>0</b>
<b>Ecosystem Resources</b>			
Linear feet of long-term stream impacts			
Mainline <sup>5</sup>	1,550 to 1,600	1,600 to 1,650	N/A
OMF Site	1,500	1,250	0
<b>Total</b>	<b>3,050 to 3,100</b>	<b>2,850 to 2,900</b>	<b>0</b>
Acres of impacts to mature native forest			
Mainline <sup>5</sup>	3	4	N/A
OMF Site	11	6	0
<b>Total</b>	<b>14</b>	<b>10</b>	<b>0</b>
Acres of long-term impacts to wetlands			
Mainline <sup>5</sup>	1.6	1.5	N/A
OMF Site	2.7	1.4	0
<b>Total</b>	<b>4.3</b>	<b>2.9</b>	<b>0</b>
<b>Geology and Soils</b>			
Export material (volume in cubic yards)	205,000	310,000	670,000 to 2,920,000
Import material (volume in cubic yards)	185,000	200,000	0 to 1,610,000
<b>Hazardous Materials</b>			
High risk for contaminated material	No	No	Yes

Notes:

<sup>1</sup> Ranges for the Preferred and South 344th Street alternatives reflect the two mainline alignment options (40 mph Alignment and 55 mph Design Option). For the purposes of analysis, the mainline also includes the test track and tail tracks.

<sup>2</sup> Ranges for the Midway Landfill Alternative reflect the three subsurface construction design options (Platform, Hybrid, and Full Excavation).

<sup>5</sup> The mainline would be constructed regardless of the alternative selected to build. Under the Midway Landfill Alternative, it would be constructed later in time as part of the TDLE project.

The OMF South build alternatives are anticipated to have similar impacts to many of the elements of the natural and built environment. However, there are some impacts and characteristics that distinguish the alternatives from each other.

Figure ES-7: Illustrated Metrics – Comparative Cost Estimates



### Annual Operating Cost Estimate\*

(Millions)




### Comparative Cost Estimate\*

(Billions)



\*Estimates are to be used for comparisons between alternatives only.  
The Preferred Alternative and South 344th Street estimates are for the sites only.

### Construction Duration and Traffic

The Midway Landfill Alternative would require extensive preparation work to address site contamination and soil stability. As a result, the overall construction period (not including final design) is anticipated to range from 6 years, 2 months to 8 years, 8 months, depending on the subsurface construction design option chosen, which is nearly double to more than double the time anticipated for either of the Preferred or South 344th Street alternatives.

The extensive site preparation work required for the Midway Landfill Alternative subsurface construction design options would expose the surrounding community to construction impacts over a longer period. It would result in much higher volumes of construction traffic for exporting and importing large quantities of fill material. The Hybrid and Full Excavation subsurface construction design options are estimated to require up to approximately 570 daily truck trips over their site preparation phase (estimated to be up to 4 years, 4 months for the Full Excavation subsurface design option and 5 years, 7 months for the Hybrid subsurface design option), as compared to 80 or fewer daily truck trips for the other OMF South site alternatives (not including construction

Figure ES-8: Illustrated Metrics – Construction Duration and Traffic



### Final Design / Construction Duration

(Years: y) (Months: m)




### Daily Truck Trips During Site Prep

(Maximum Trips)



associated with the mainline options). It is important to note, however, that these estimates represent a worst-case scenario during the site preparation phase and not a daily average of truck trips over the entire construction period. While I-5 and the arterials surrounding the Midway Landfill Alternative are anticipated to be able to 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.

Should OMF South be at the Midway Landfill Alternative site, it would need to connect to the FWLE mainline tracks between the landfill and I-5. Construction of FWLE is underway and scheduled to be complete for the start of service in 2025/2026 and will not preclude selection of the OMF South site at the Midway Landfill. If OMF South were to connect to the FWLE mainline tracks after they are operational, it could result in shutdowns of revenue service for periods of time during construction.

OMF South Opening Schedule

Table ES-2 shows the current planned opening dates for the three OMF South build alternatives. Compared to the Preferred and South 344th Street alternatives, the Midway Landfill Alternative would open years later. The additional LRV maintenance and storage capacity provided by OMF South needs to be available with sufficient time to accept delivery of and commission new LRVs for expansion projects like TDLE and WSLE and to store existing LRVs. Without the OMF South in place, TDLE and WSLE would operate at reduced service levels.

Following the OMF South opening, the facility would begin receiving new LRVs. Completing delivery, testing, and commissioning for all new LRVs is anticipated to take about 3 years. Minimum operating segments and opening year service levels for TDLE and WSLE may not require all the new vehicles. Project schedules will be refined as project development advances and are not final until projects are in final design.

Table ES-2: OMF South Final Design/Construction Durations and Planned Opening Dates

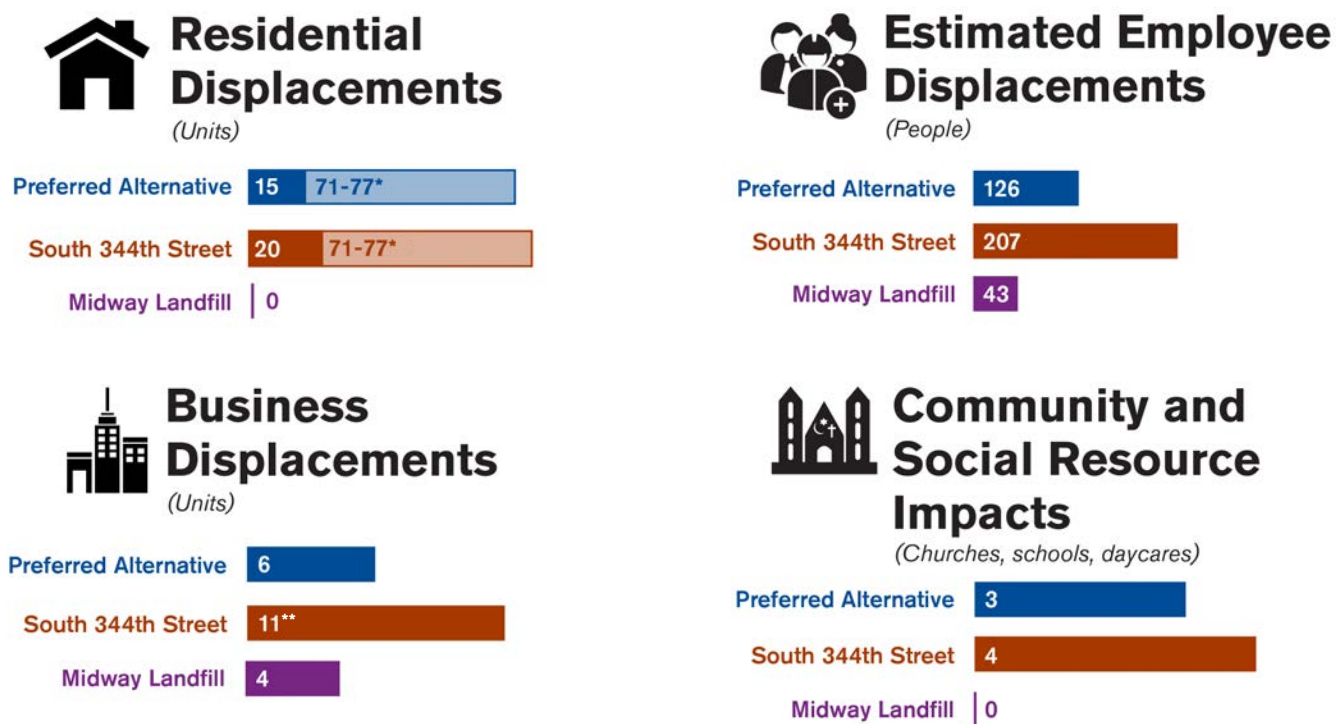
Characteristic	Preferred Alternative	South 344th Street Alternative	Midway Landfill Alternative
Final Design/Construction Duration	4 years, 8 months	4 years, 9 months	Platform: 7 years, 6 months Hybrid: 10 years Full excavation: 8 years, 5 months
OMF South Opening Date	2032	2032	Platform: 2035 Hybrid: 2037 Full excavation: 2036

Notes: Final Design/Construction Duration includes 6 months construction float.

## Acquisitions, Land Use, and Economics

The Preferred and South 344th Street alternatives would have the most displacements, particularly for residents and employees, as compared to the Midway Landfill Alternative, which is primarily undeveloped. Most of the residences displaced by the Preferred and South 344th Street alternatives are due to the mainline through the Belmor Park Golf & Country Club (Belmor). Relocating Belmor residences may be challenging due to the limited availability of mobile homes in the area. The Midway Landfill Alternative would not displace any residences. However, if the Midway Landfill Alternative were selected to be built, the residential displacements from mainline would still occur as a result of TDLE, subject to environmental review. Therefore, these displacements could ultimately occur regardless of which OMF South alternative is selected.

**Figure ES-9: Illustrated Metrics – Acquisitions, Land Use, and Economics**



Key **Site** **Mainline**

\*The mainline in Federal Way is planned to be constructed as part of TDLE and therefore would be built regardless of which OMF South alternative is selected.

\*\*Includes GarageTown, comprised of approximately 60 owners.

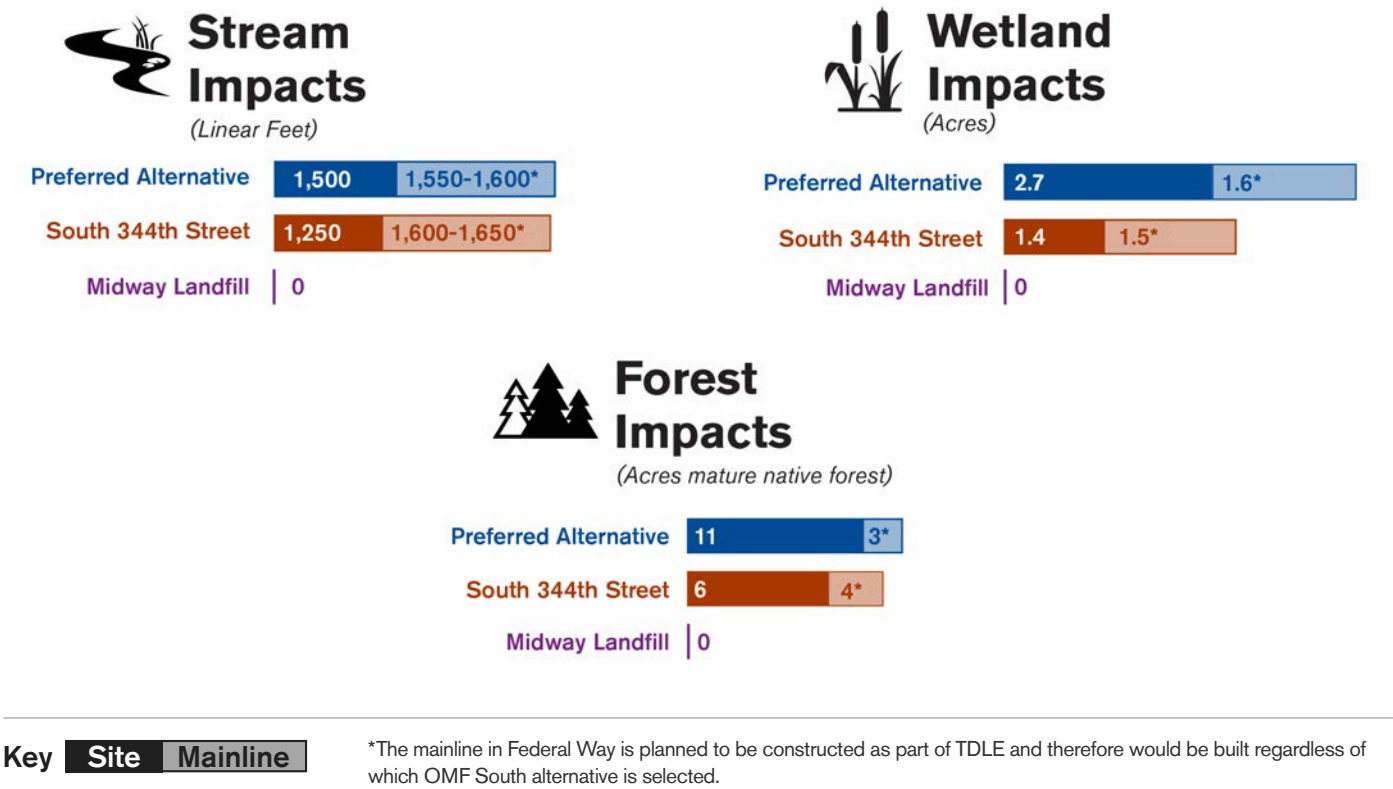
The Preferred Alternative would displace the Christian Faith Center, which includes a child-care center and the Pacific Christian Academy. The Christian Faith Center would be difficult to relocate because it consists of over 200,000 square feet of building space and numerous parking lots on an approximately 25-acre campus. The South 344th Street Alternative would displace the most businesses and employees, including the Ellenos Yogurt manufacturing facility and GarageTown, which includes approximately 60 owners. These properties would also be difficult to relocate due to their lot size, use, and specialized facility requirements. The South 344th Street Alternative would displace four religious facilities: Voice of Hope Church, Family Life Community Church, and Redwood Church of God and Tabernacle Temple of Praise, which share a building.



Ecosystem Resources

Both the Preferred and South 344th Street alternatives are situated near tributaries of Hylebos Creek, including associated forested riparian habitat and wetlands that provide a range of ecological functions. The Preferred Alternative would have the greatest impact to ecological resources, including streams, wetlands, and mature native forest. The Midway Landfill Alternative is in an area with few natural resources and therefore would have minimal impacts to ecosystem resources.

Figure ES-10: Illustrated Metrics – Ecosystem Resources



The Preferred and South 344th Street alternatives would relocate portions of East Fork Hylebos Creek Tributary, which would lead to permanent impacts to adjacent wetland and forested riparian habitat. Some of the riparian habitat along the East Fork Hylebos Creek Tributary is also considered mature forested habitat. The mainline tracks for the Preferred and South 344th Street alternatives would impact the same area of wetland, but the South 344th Street Alternative mainline tracks would impact more wetland buffer areas due to the greater length of the tail tracks. However, if the Midway Landfill Alternative were selected to be built, impacts to East Fork Hylebos Creek Tributary would still occur from the future construction of TDLE. Therefore, the impacts would occur regardless of which OMF South alternative is selected.

Salmonids are not currently known or expected to be present in reaches of East Fork Hylebos Tributary or West Fork Hylebos Tributary in the study area. However, these streams are designated as essential fish habitat for Pacific salmon because of their potential to support fish use.

## ***Hazardous Materials***

The Midway Landfill Alternative poses unique risks that are not of concern for the Preferred and South 344th Street alternatives. As a Superfund site, the Midway Landfill is covered by a protective cap and is under active monitoring and reporting to ensure that the cleanup measures continue to function as planned. These protective and monitoring systems would need to be replaced or upgraded to varying degrees depending on the subsurface construction design option chosen. Further, the landfill waste is decomposing and settling at different rates, which creates engineering challenges as well as concerns for safety during construction and long-term operation and maintenance. The continuation of the landfill monitoring systems and mitigation for potential risks posed by settlement and methane gas over the lifespan of the facility would add to additional operating complexities and costs.

In addition to ground settlement and human health risks, the Midway Landfill Alternative would require Washington State Department of Ecology (Ecology) and/or U.S. Environmental Protection Agency (EPA) approval to amend the existing Ecology Cleanup Action Plan and EPA ROD to confirm that the project would maintain the environmental cleanup and protection commitments currently in place for the landfill. This approval process could be lengthy and poses risk to the project schedule and cost. Further, acquisition of and construction within the Midway Landfill would cause Sound Transit to incur potential liability under state law (the Model Toxics Control Act [MTCA]) and federal law (the Comprehensive Environmental Response, Compensation, and Liability Act [CERCLA]).

## **ES.4 Other Environmental Considerations**

### ***Environmental Justice***

This Draft EIS includes an Environmental Justice Assessment, as required by Executive Order 12898 and Department of Transportation Order 5610.2(a), in Appendix E. This analysis follows guidance in FTA Circular C-4703.1 and addresses whether the OMF South alternatives would result in disproportionate and adverse effects to minority and/or low-income populations and summarizes the public outreach to minority and low-income populations within the project area. The analysis also discusses the potential benefits of the project to minority and/or low-income populations, as well as the specific outreach efforts made during project development to involve these populations.

The population in the OMF South study area has a higher percentage of low-income and minority persons than the Sound Transit service district and King County. Project impacts primarily concern displacement of housing and community facilities, including religious facilities and childcare centers. Other long-term and construction-related project impacts would be limited or avoided, minimized, or mitigated through the implementation of effective best management practices and mitigation measures.

Benefits to people served by the project, including minority and low-income residents, would include improving regional connectivity and mobility by supporting system-wide expansion of light rail as called for in Sound Transit 3 as well as job creation from construction and operation of the project. Although all populations would have access to these benefits to the same extent, the benefit would be greater for minority and low-income populations because these groups are more likely to use transit.

## Executive Summary

---

As part of its public engagement efforts during the OMF South scoping period and 2021 SEPA Draft EIS process, Sound Transit conducted a preliminary demographic analysis to identify low-income, minority, and limited-English-proficiency populations. Based on this analysis, Sound Transit used specific strategies to reach those communities during public outreach. 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.

After considering the project's potential effects, mitigation and avoidance measures and anticipated benefit to minority and low-income populations, FTA has made a preliminary determination that the OMF South would not result in disproportionate and adverse effects on minority and low-income populations.

### **Section 4(f)/Section 6(f) Resources**

Federal law protects historic properties and significant, publicly owned parks and recreation areas from being adversely affected by U.S. Department of Transportation projects. These resources are protected under federal laws commonly referred to as Section 4(f), Section 106, and Section 6(f). Cedar Grove Park and Town Square Park, both in Federal Way, are within the study area but would not incur impacts that would rise to the level of a Section 4(f) use. Five parks are within the Midway Landfill study area (Parkside Park, Parkside Wetlands, Salt Air Vista Park, Linda Heights Park, and West Hills Park). They also would not incur impacts that would rise to the level of a Section 4(f) use. The mainline for the Preferred and South 344th Street alternatives would require the relocation of Bonneville Power Administration (BPA) powerlines. BPA determined, and the State Historic Preservation Officer (SHPO) concurred, that raising the transmission lines to accommodate the OMF South project would have no adverse effect on historic properties under Section 106. Due to this, FTA has made a preliminary determination that the Preferred and South 344th Street alternatives would have a *de minimis* impact under Section 4(f). There are no Section 6(f) resources in OMF South study area and therefore no potential impacts.

## **ES.5 Cumulative Impacts**

Cumulative impacts are from past, present, and reasonably foreseeable future actions that could interact with the impacts of OMF South alternatives, regardless of the project proponent. As described above, there would be impacts associated with TDLE that would overlap with OMF South, particularly from the mainline tracks for the Preferred and South 344th Street alternatives. TDLE would introduce additional LRVs traveling at higher speeds, which would result in greater potential noise impacts. This could require additional mitigation in the form of longer noise barriers as well as mitigation for some vibration impacts, which could be constructed as part of the OMF South project. FWLE and TDLE, combined with OMF South, could have cumulative visual impacts due to additional elevated tracks, large structures, and clearing of trees and vegetation, particularly for the mainline track alignments adjacent to I-5. Lastly, these projects, coupled with OMF South, would contribute cumulatively to reductions in the amount and function of ecosystem resources in the study area. In addition, the Federal Way City Center Access Project and Washington State Department of Transportation (WSDOT) Triangle project are proposed adjacent to the Preferred and South 344th Street alternatives. Both projects are in the early design phase, and neither have guaranteed funding.



## ES.6 Avoidance, Minimization, and Mitigation

Sound Transit would comply with applicable federal, state, and local environmental regulations and would apply mitigation measures to reduce significant adverse impacts. The Draft EIS identifies potential measures to mitigate adverse impacts as well as avoidance and minimization measures that would be part of the project. The following summarizes select mitigation measures for impacts that the alternatives might not be able to minimize or avoid. These measures would be refined through final design and permitting.

### ***Acquisitions, Displacements, and Relocations***

Sound Transit would compensate and help relocate residents and businesses affected by property acquisitions, consistent with Sound Transit policy and applicable federal regulations.

### ***Visual and Aesthetic Resources***

Sound Transit would incorporate context-sensitive design measures that would be developed and refined during final design with input from the affected communities and cities. The design measures could include additional plantings and landscaping to minimize adverse visual impacts, along with retaining wall and building façade treatments. Sound Transit would refine the landscaping, aesthetic treatments, or other features to help screen views of the mainline tracks from residences as the project design is further developed and feedback from reviewing agencies and the public is received.

Sound Transit would consult with WSDOT staff to develop appropriate site-specific measures and mitigate impacts to Resource Conservation Areas adjacent to I-5 with replacement property or with other measures agreed to by WSDOT and FHWA, consistent with the WSDOT Roadside Policy Manual (WSDOT 2022).

### ***Noise***

Noise barriers would be necessary to mitigate noise impacts from train operation along the 55 mph Design Option for the mainline tracks for the Preferred and South 344th Street alternatives. The noise barriers would be along the elevated mainline tracks along a portion of Belmor. The exact location would depend on the mainline design option chosen.

Both mainline options for the Preferred and South 344th Street alternatives would require the removal of an existing berm and noise walls adjacent to I-5 that screen residences from traffic noise. Sound Transit would work with WSDOT to replace the function of the berm and noise walls.

### ***Ecosystem Resources***

Both the Preferred and South 344th Street alternatives would impact wetlands, streams, and their respective forested buffers. During final design and permitting, Sound Transit would first work to avoid and minimize impacts through design measures and best management practices. Where impacts are unavoidable, Sound Transit would mitigate them in accordance with applicable federal regulations, local critical area ordinances, and permit requirements.

After project construction, the temporarily impacted wetlands, streams and buffers would be restored and replanted onsite. Mitigation for permanent impacts could include use of an approved mitigation bank, such as

the Port of Tacoma Upper Clear Creek Mitigation Bank, or in-lieu fee programs, like the King County Mitigation Reserves Program. Impacts on wetland and streams could also be mitigated through offsite mitigation actions developed in collaboration with Tribal, federal, and state agencies and the city of Federal Way.

### **ES.7 Significant Unavoidable Adverse Impacts**

With the avoidance, minimization, and potential mitigation measures described in this Draft EIS, significant adverse impacts could be avoided for most elements of the environment.

The Preferred and South 344th Street alternatives would have varying degrees of impacts to mature forest and other native vegetation, which would result in a loss of habitat. The loss of mature forested habitat, including adjacent to the I-5 corridor, would result in longer-term ecological and visual impacts that may not be immediately mitigable by replacement vegetation or restoration actions.

### **ES.8 Public Involvement to Date and Additional Invitation to Comment**

Sound Transit has been engaging the public and agencies since the start of early scoping in 2018, conducted under SEPA. During that early scoping, Sound Transit held a 30-day comment period from April 2 to May 3, 2018, that included open houses and opportunities for the members of the public and agencies to provide input on the purpose and need of the OMF South and TDLE projects. In 2019, Sound Transit conducted formal public environmental scoping under SEPA. This included meetings with the public and agencies, public notices and advertisements, and a comment period from February 19 through April 1, 2019. During the development of the 2021 SEPA Draft EIS, Sound Transit continued community engagement activities through drop-in sessions and an online open house where attendees could learn more about the project. Additionally, Sound Transit has had continued coordination with agencies and local jurisdictions throughout the environmental review process.

The 2021 SEPA Draft EIS was available for an extended comment period of 45 days (March 5 to April 19, 2021) that included two online public meetings/hearings and other opportunities for the public and agencies to comment in writing. Appendix B, Public Involvement and Agency Coordination, has additional details including how Sound Transit has engaged low-income and minority populations.

As the design for the Preferred Alternative was advanced and modified in response to comments received during the 2021 SEPA Draft EIS comment period, FTA and Sound Transit determined the need for an EIS in compliance with NEPA to support federal funding and approvals. On July 19, 2023, FTA issued a notice of intent to prepare an EIS in the Federal Register and initiated a 30-day scoping period under NEPA. During the scoping period FTA invited comments on the project alternatives, information, and analyses relevant to the project. The publication of this Draft EIS provides another opportunity for public involvement and comment.

## ES.9 Areas of Controversy and Issues to be Resolved

The following are known areas of controversy and issues to be resolved. Others may be identified as the project advances.

### ***Preferred and South 344th Street Alternatives***

The reconfiguration of surface streets under the Preferred Alternative and the removal of street segments within the South 344th Street Alternative site may not comply with Federal Way development regulations concerning the size of blocks within the street network. If the Board were to select either the Preferred Alternative or South 344th Street Alternative, Sound Transit would work with Federal Way through the street vacation process to address the standards.

Both the Preferred and South 344th Street alternatives would impact ecosystem resources, specifically wetlands and streams. This could pose a risk to both the schedule and budget of these alternatives, given the potential complexity and extent of negotiations related to the environmental permitting process and development of a comprehensive mitigation approach acceptable to Tribal, federal, state, and local agencies.

### ***Midway Landfill Alternative***

Sound Transit has identified four risks that are unique to the site's prior use as a disposal facility and classification as a Superfund site: (1) ground settlement, (2) human health and safety, (3) legal, and (4) regulatory coordination. The first two risks are described in Appendix D, Midway Landfill Support Documents. Legal risk includes incurring potential liability under MTCA and CERCLA through purchase or lease of any portion of the landfill or through construction within the landfill. Regulatory risks include impacts to the project schedule due to the additional approvals needed before construction.

## ES.10 Next Steps

The following next steps are anticipated after the publication of the NEPA Draft/SEPA Supplemental Draft EIS:

- **Joint NEPA Draft/SEPA Supplemental Draft EIS Public Comment Period:** The Draft EIS will be available for Tribal, agency, and public comment for 45 days. In addition, public hearings will be held during this comment period to receive verbal testimony. Please see the Fact Sheet at the beginning of this document for details.
- **Joint NEPA/SEPA Final EIS:** FTA and Sound Transit will prepare and publish a Final EIS that will document and respond to substantive comments received on the 2021 SEPA Draft EIS and this NEPA Draft/SEPA Supplemental Draft EIS.
- **Project Decision:** After the Final EIS is published, the Board will consider the public comments received and the alternatives evaluated in the Final EIS and select the project alternative to be built.
- **Federal Approval:** FTA will issue a ROD that states FTA's decision on the project, identifies the alternatives considered, and lists mitigation commitments. The issuance of the ROD is required before federal funding or approvals.
- **Final Design and Construction:** This phase includes final facility design, permitting, property acquisitions and relocation, construction, and testing.
- **Open for Operations:** 2032 is the estimated date for opening the OMF South facility, based on Sound Transit's Resolution R2021-05.



Executive Summary

Figure ES-11 below shows the anticipated schedule for the environmental review, design, construction, and opening of OMF South.



Figure ES-11: Anticipated Project Milestones

# ***CONTACT US***



**Visit our webpage and sign up for project news [www.soundtransit.org/omfs](http://www.soundtransit.org/omfs)**

**Email [OMFSouth@soundtransit.org](mailto:OMFSouth@soundtransit.org)**

**Call 206-398-5453**

