



# APPENDIX D

## Scoping Comments from Tribes and Agencies

## **Appendix D. Scoping Comments from Tribes and Agencies**

Scoping comment letters were received from one tribal government, one federal agency, four state agencies, and eight regional or local agencies. Letters are included in this appendix in the following order:

### **Tribes**

- Puyallup Tribe of Indians

### **Federal Agencies**

- U.S. Environmental Protection Agency

### **State Agencies**

- Washington State Department of Archaeology and Historic Preservation
- Washington State Department of Ecology
- Washington State Department of Natural Resources
- Washington State Department of Transportation

### **Regional and Local Agencies**

- Port of Tacoma and Northwest Seaport Alliance
- Puget Sound Regional Council
- King County, Metro Transit Division
- Pierce Transit
- City of Federal Way, Directors of Public Works and Community Development
- City of Fife, City Council and Mayor
- City of Fife, Directors of Public Works and Community Development
- City of Tacoma, City Manager



# Puyallup Tribe of Indians



May 1<sup>st</sup>, 2019

Honorable John Marchione  
Sound Transit Board Chair  
401 South Jackson Street  
Seattle, WA 98104

Dear Chair Marchione,

The Puyallup Tribe of Indians would like to offer its esteemed gratitude to Mayor Woodards, Executive Dammeier, and Sound Transit CEO Rogoff for participating in our recent government to government consultation last February over the Tacoma Dome Link Extension Project. We recognize the importance of continuing to engage in meaningful dialogue to ensure the project addresses concerns of the Puyallup Tribe and that project delivery meets expectations.

Our comments submitted today are for the Scoping Period Analysis and characterize the Tribe's positions on several of the station locations, crossings, and alignment configurations filtered out of the Level 2 Analysis. The Tribe will continue to work with you and your staff to identify a preferred alignment that works congruous with our developments on the Puyallup Reservation.

## **South Federal Way Station Alignment**

There are two primary alignments toward the City of Fife from the South Federal Way Station. One alignment along I-5 and the other along SR 99. We believe an SR 99 alignment would pose a multitude of tribal trust property impacts to our members. We believe that there are fewer impacts to tribal property along I-5 and thus prefer this alternative. While there are potential cultural resource impacts along this corridor near the St. George property, we believe these impacts can be properly addressed by working with our Historic Preservation Department. By working together, we believe these impacts can be minimized or outright avoided. It is the Tribe's understanding that both alignments are likely to be studied as part of the EIS and welcome the opportunity to provide input and data in identifying challenges with both alignments.

Additionally, the Tribe looks forward to studying the interchange between the SR 167 project and the Tacoma Dome Link Extension where both projects bifurcate Hylebos Creek. It is vital this area is properly studied since all prospective alignments thread in the same location. It is important for Sound Transit and WSDOT to work collaboratively with the Tribe to ensure that efforts to enhance the Hylebos are not conflicted by the two projects.

### **Fife Station & Alignment**

The City of Fife and the Tribe have been actively collaborating on a station location. The Tribe supports Fife-3A and Fife-3B in order to capture potential riders going to and from existing Tribal enterprises in this area and to recognize the City of Fife's plans to catalyze the area as part of their City Center Plan. We believe Fife-4 may impose traffic circulation issues along SR 99 and Fife-1 is too far away to maximize ridership of existing and potential development in the area.

Regarding alignment out of the station locations, the Tribe supports the continued study of alignments along the south side of SR 99 and along the North I-5 right of way. We are opposed to a north SR 99 alignment between 46<sup>th</sup> Ave E to Alexander Ave as this path would significantly impact Tribal facilities, businesses, residences, and trust lands. Additionally, we recognize both a SR 99 and I-5 alignment will impact the Puyallup Tribe Integrative Medicine Building property and Sound Transit will likely need an easement from the Tribe.

### **Puyallup River Crossing**

Tribal Council is pleased that Sound Transit is exploring multiple options to span the Puyallup River, including the option of a clear span. The Puyallup River is a significant historical, cultural, and economic resource to the Puyallup Tribe. If an in-river piling option were to be pursued, strong mitigation measures to prevent impacts to the Tribal Fishery must be explored and part of the EIS process. We look forward to studying the differences between the impacts associated with the varying options of spanning the river. Additionally, we are pleased that the pre-scoping process has eliminated alignments that would impact the Tribe's Ceremonial Grounds on the western bank of the river.

### **East Tacoma Station & Alignment**

Regarding the East Tacoma Station locations, the Tribe is supportive of ET-3a/ET-3b with ET-6 being an important alternative to study in the EIS. ET-1 and ET-2 are not supportive of ridership and connectivity to East Tacoma. ET-5 would have individual member trust land impacts. In any station design the Tribe is concerned with traffic circulation in and out of this station. Consideration of existing road conditions and street realignment should be an essential part of this station's study to maximize ridership and reduce congestion on Portland Avenue.

Additionally, we are interested in future consideration for Sound Transit parking facilities for the station in this area. The Tribe will have to carefully evaluate usage of the Tribe's parking facilities in conjunction with these stations so that system demand is not impacting Tribal enterprises.

**Tacoma Dome Station**

In this station area the Tribe prefers alternatives TD-2 and TD-3 for continued study. We believe these stations are the strongest suited for supporting ridership and connecting riders to other transit connections.

In our review of the remaining stations, TD-4 East Off-Street is the most impactful to our off-reservation trust lands and this station should be removed from further study. We also find TD-4 East In-Street to be undesirable in its current location. However, we believe the station warrants further study in a nearby location that doesn't directly impact the frontage of the Tribe's property. TD-4 West & TD-1 we believe are poor location choices due to congestion impacts on East D Street and connecting other transit options.

Finally, there has been some recent discussion of the possibility of undergrounding a station within the Tacoma Dome station location area. The Puyallup Tribe is deeply concerned with tunneling in the Tacoma Dome station because of the high probability of cultural and human remains in the area. As the high ground near the original mouth of the Puyallup River, the Tribe knows this area to be a large traditional village site. In 2015, as part of the Tacoma Trestle Project, Sound Transit unearthed a cultural finding within this area. We continue to work with Sound Transit in mitigating the impacts of cultural and historic resources of the Tacoma Trestle project to this day. An above ground station will have challenges mitigating for cultural and historic resources. An underground station would expose the project to potential catastrophic risks that could end up being immitigable and prevent the completion of the project. If this proposal continues forward in the EIS, the Tribe will actively work with Sound Transit's Cultural Resource Consultant to properly characterize the impact of a below grade station.

We thank Sound Transit for this opportunity to provide comment for the Scoping Period Analysis. The Puyallup Tribe is excited at the opportunities regional light rail will provide to our membership. We look forward to continuing to work with you and your staff on making sure this project is successful.

Sincerely,



Bill Sterud, Chairman  
Puyallup Tribal Council



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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Seattle, WA 98101-3123

APR 30 2019

REGIONAL  
ADMINISTRATOR'S  
DIVISION

Mr. Mark Assam  
Federal Transit Administration, Region 10  
915 Second Avenue, Suite 3142  
Seattle, Washington 98174

Ms. Elma Borbe, Senior Environmental Planner  
Sound Transit  
401 S. Jackson Street  
Seattle, Washington 98104-2826

Dear Mr. Assam and Ms. Borbe:

The U.S. Environmental Protection Agency has reviewed the Federal Transit Administration's March 26, 2019 Notice of Intent initiating the scoping process for the FTA and Sound Transit Tacoma Dome Link Extension (TDLE), a light rail transit extension project (EPA Region 10 project number 18-0020-FTA). The EPA comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR S. 1500-1508) and Section 309 of the Clean Air Act.

The Tacoma Dome Link Extension is part of the voter-approved regional transit system plan, Sound Transit 3. The project purpose is to expand the Link light rail system from the Federal Way Transit Center in Federal Way, King County, to the Tacoma Dome Station in Tacoma, Pierce County, Washington; to make appropriate community investments to improve mobility; and to increase capacity and connectivity for regional connections. The project corridor is approximately 10 miles long, with four proposed stations (South Federal Way, Fife, East Tacoma, and Tacoma Dome) and two park-and-ride facilities (South Federal Way and Fife). The project would also cross Reservation lands of the Puyallup Tribe of Indians, and all alternatives would cross the Puyallup River on a new bridge to the north of I-5. The build alternatives being evaluated follow the I-5 corridor, the SR 99 corridor, or a combination of the two corridors. Build alternatives would also include access features such as transit-related roadway, bicycle, and pedestrian improvements around station areas.

FTA and Sound Transit identify the following subjects<sup>1</sup> as likely areas of investigation for possible adverse effects:

- Transportation, including navigable waterways, regional travel, transit, local travel (traffic, access and circulation, safety, bicycling, walking, and parking), and freight movement;
- Land use and consistency with applicable plans;
- Property acquisitions and displacements;
- Social and economic impacts;
- Park and recreation resources;
- Historic, cultural, and archaeological resources – including Section 106 of the National Historic Preservation Act and Tribal resources and ownership;
- Environmental justice;

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<sup>1</sup> These subjects were identified either in the Federal Register NOI or on the project website.



- Environmental justice;
- Electromagnetic fields;
- Public services and utilities – including the Bonneville Power Administration;
- Geology and soils;
- Hazardous materials;
- Water resources – including floodplains and crossing the Puyallup River;
- Visual resources and aesthetic qualities;
- Air quality – including greenhouse gas emissions;
- Noise and vibration;
- Energy use;
- Safety and security;
- Community impacts -- facilities and neighborhoods;
- Ecosystems, including threatened and endangered species and potential marine mammals;
- Section 4(f) and Section 6(f) resources;
- Short-term construction impacts and long-term operations;
- Indirect and cumulative impacts – including climate change and environmental sustainability, as well as the effects of other projects such as the Operations and Maintenance Facility South; and
- Proposed measures to avoid, minimize, or mitigate significant adverse impacts.

We agree that these issues should be addressed in the NEPA analysis. For your consideration, we offer the enclosed detailed scoping comments to provide more information regarding the above topics, and we recommend a few additional subjects for evaluation. We also include information to assist interagency coordination with respect to contaminated sites that may occur within the project area and that could potentially be affected by the proposed light rail project. In addition to these scoping comments, for reference, we also enclose our letter of May 2, 2018, which responds to the request from FTA and Sound Transit for Early Scoping comments on the Tacoma Dome Link Extension. Our Early Scoping letter provides additional recommendations regarding vulnerable and disadvantaged populations, consultation with affected tribes, and subjects for analysis in the EIS.

We appreciate the opportunity to offer comment at the scoping stage for the Tacoma Dome Link Extension. If you have questions or need further assistance, please contact me at (206) 553-2966 or at [somers.elaine@epa.gov](mailto:somers.elaine@epa.gov).

Sincerely,



Elaine L. Somers  
Environmental Review and Sediment Management Unit

Enclosures

U.S. EPA detailed scoping comments for the Tacoma Dome Link Extension  
U.S. EPA Early Scoping letter for Tacoma Dome Link Extension, May 2, 2018  
Commencement Bay Nearshore/Tideflats CERCLA site location and map

**U.S. Environmental Protection Agency  
Detailed Scoping Comments for the  
Tacoma Dome Link Extension**

**Range of alternatives**

We recommend that the EIS include a reasonable range of alternatives that meet the stated purpose and need, goals and objectives, and that respond to issues identified during the scoping process. The alternatives analysis would then compare alternatives with respect to how well they respond to the stated purpose and need, goals and objectives, and scoping issues. The Council on Environmental Quality (CEQ) recommends that all reasonable alternatives be considered, even if some of them could be outside the capability of the applicant or the jurisdiction of the agency preparing the EIS. Consistent with the purpose of the NEPA,<sup>2</sup> the EPA encourages selection of alternatives that protect, restore, and enhance the environment. We support lead agencies' efforts to identify and select alternatives that maximize environmental benefits and that avoid and minimize impacts and mitigate any remaining unavoidable environmental impacts.

**Scope of effects analysis**

The NEPA calls for analysis of effects in a broad sense, addressing important issues that arise during scoping. Impacts from a project may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect would be beneficial. There can be situations when adverse impacts occur even though regulations are met. For example, several air toxics are not regulated but are known to create a health risk. The environmental analysis would need to evaluate and disclose the impacts from all emissions regardless of whether there is a regulation that manages those emissions. Therefore, it is important to consider impacts that may not be managed through existing regulations. "Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment" is but one of ten factors that should be considered in evaluating severity of impact (See 40 CFR 1508.27(b) for more information).

**Hazardous materials, contaminated sites**

Commencement Bay Superfund site: As proposed on the project website, it appears the Tacoma Dome Link Extension alternatives do not overlap with the defined area of the Commencement Bay Nearshore/Tideflats Superfund site or its associated problem areas (please reference the enclosed Commencement Bay Nearshore/Tideflats Superfund site map, area definition and associated problem areas where active remediation has occurred). However, the question of overlap with sites that have undergone active remediation or overlap with habitat mitigation sites associated with active remediation should be specifically assessed and addressed in the EIS. Should there be overlap with cleanup areas, existing sediment remediation activities should be identified and protected, especially any caps placed to isolate contamination in-situ. In addition, construction BMPs to protect water and sediment quality and associated resources, should be identified for any alternatives. Questions related to the Commencement Bay Superfund site should be directed to EPA Region 10 Remedial Project Manager, Kristine Koch, at Koch.kristine@epa.gov or (206) 553-6705.

Tacoma Tarpits Superfund site: Based on the project website map, the northern most Tacoma Dome Link Extension route alternative that parallels Puyallup Avenue is located close to the former Tacoma Tarpits Superfund site. The alignment alternative appears to be just south of the site's southern border.

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<sup>2</sup> 40 CFR 1500.1



We recommend that a definitive determination be made regarding any potential impacts to the site. It does not appear from the website map that other current or historic CERCLA sites would be affected by the Tacoma Dome Link Extension route alternatives.

For questions regarding CERCLA Superfund sites between Seattle and Tacoma near Sound Transit routes, contact Shawn Blocker, Unit 3 Superfund Manager: (206) 553-4166 or blocker.shawn@epa.gov.

For questions regarding Washington State Model Toxics Control Act sites, please contact Rebecca Lawson at the Washington State Department of Ecology: 360-407-6241 or Rebecca.lawson@ecy.wa.gov.

### **Aquatic resources**

The NEPA analysis should address all potentially affected aquatic resources, including surface water and ground water, water quality and quantity, hydrology, and sensitive aquatic areas, such as wetlands, streams, floodplains, shorelines, riparian areas, ground water recharge areas, hyporheic zones, drinking water sources and supplies.

We recommend that the NEPA document describe aquatic habitats in terms of habitat type, plant and animal species, functional values, and integrity. Evaluate impacts in terms of the aerial (acreage) or linear extent to be impacted and by the functions they perform. The effects assessment should address changes in the extent of impervious surface, stormwater runoff (including any leaching of chemical substances from the guideway rails/elevated structure or light rail trains into waterbodies), treatment and management, including use of Low Impact Development strategies, effects to waters listed as impaired under Clean Water Act Section 303(d), and compliance with other Clean Water Act requirements and implementing regulations, such as those for Total Maximum Daily Loads, and anti-degradation. For construction activities that would disturb more than one acre of land (40 CFR 122.26(b)), a National Pollutant Discharge Elimination System stormwater discharge permit is required.

Project proponents should plan, design, construct and maintain the project to avoid or have minimal long-term water quality and aquatic resources impacts. For any impacts that cannot be avoided through siting and design, the NEPA document should include protection measures and describe the types, location, and estimated effectiveness of best management practices applied to minimize and mitigate impacts to aquatic resources.

The proposed activities may require a Clean Water Act Section 404 permit from the Army Corps of Engineers. For wetlands and other special aquatic sites, the Section 404(b)(1) Guidelines, found at 40 CFR 230, establish a presumption that upland alternatives are available for non-water dependent activities. The 404(b)(1) Guidelines require that impacts to aquatic resources be (1) avoided, (2) minimized, and (3) mitigated, in that sequence. The NEPA document should discuss in detail how planning efforts (and alternative selection) conform to Section 404(b)(1) Guidelines sequencing and criteria. In other words, the project proponent must show that they have avoided impacts to wetlands and other special aquatic sites to the maximum extent practicable. The NEPA document should discuss alternatives that would avoid wetlands and aquatic resource impacts from fill placement, water impoundment, construction, and other activities before proceeding to minimization and other mitigation measures.

We recommend that the project plan and design avoid and minimize encroachment upon, or disturbance to, natural stream hydrology, stream migration zones, stream banks and channels, riparian areas,

wetlands, and floodplains. It is important to maintain and preserve natural stream geomorphology and hydrology and restore and preserve the natural and beneficial effects of riparian areas and floodplains.

For Clean Water Act Section 303(d) listed water bodies in the project area, the NEPA document should also disclose information regarding Total Maximum Daily Loads, the water bodies to which they apply, and pollutants of concern. The proposed project should not further degrade 303(d) listed waters and should be consistent with Total Maximum Daily Loads to restore beneficial use support for impaired waters. If additional pollutant loading is predicted to occur to a 303(d) listed stream due to the proposed project, the project should include measures to control existing sources of pollution to offset pollutant additions, such as from road or station construction, so that no deterioration of water quality occurs.

#### **Air toxics, construction emissions mitigation**

The EIS should disclose whether air toxics emissions would result from project construction and operations, discuss the cancer and non-cancer health effects associated with air toxics and diesel particulate matter, and identify sensitive receptor populations and individuals who are likely to be exposed to these emissions.

Air toxics and diesel emissions, which are emitted from mobile sources, construction vehicles and equipment, are known or suspected to cause cancer or other serious health effects, such as respiratory, neurological, reproductive, and developmental effects. The proposed project should include measures to substantially reduce emissions of and exposure to these air pollutants for construction workers and nearby residents and businesses. We recommend including and committing to implement a full suite of construction mitigation measures, such as those from the Clean Construction USA Web site at <https://www.epa.gov/cleandiesel/construction-and-agriculture#construction>. Measures such as diesel engine retrofit technology in off-road equipment would greatly help to reduce air toxics and diesel particulate emissions. Such technology may include diesel oxidation catalyst/diesel particulate filters, engine upgrades, engine replacements, newer model year equipment, use of biodiesel, or combinations of these strategies.

In addition, we encourage use of the highest-tiered equipment available during project construction (the higher the tier, the lower the emissions). Use of Tier 4 equipment (or Tier 3 where Tier 4 equipment is not available) coupled with an anti-idling program, can help to reduce combustion emissions during construction. For more information about air toxics, please contact Karl Pepple, EPA Air Program, at (206) 553-1778.

As the project moves forward, we recommend that FTA and Sound Transit hold community meetings to address the concerns of all affected neighborhoods regarding emissions and other project construction, operation and maintenance impacts, and that their concerns be addressed in the NEPA analysis.

#### **Recommendations for route selection and project design**

Protect and enhance natural areas and corridors. Although it is densely urbanized, the project area may include various parks, green spaces, greenbelt corridors, and habitat restoration projects. These are important open space and recreational features that provide ecological benefits and contribute to human health and wellbeing. We recommend that such features be identified, that FTA and Sound Transit avoid and minimize impacts to them, and that they be enhanced and connected wherever practicable. We also suggest contacting and coordinating with the Puyallup Tribe, local interest groups,<sup>3</sup> and neighborhoods, as there may be opportunities to protect, restore, or enhance the continuity of corridors and other upland

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<sup>3</sup> For example, the Pierce County Biodiversity Alliance, Tahoma Audubon, Friends of the Hylebos, and more.

and aquatic areas. Information regarding existing corridors, gaps that could be restored, and how the Build Alternative options would potentially affect those areas, would be helpful to inform the analysis of routing options, project design, and mitigation opportunities.

Maximize the use of existing infrastructure. We recommend maximizing the use of existing transportation corridors and rights-of-way to the extent practicable, retrofitting them as needed to make them serviceable and more environmentally functional, and minimizing the creation of new corridors that may infringe upon remaining open space. Where property acquisition and project design could potentially create new open space to improve community cohesion, livability, and aesthetics, we encourage that this be done in collaboration with community members.

Consider redevelopment. Transportation can help to make cities vibrant and attractive. Where it may be necessary to create new corridors, we recommend first consider redevelopment of underused urban areas, such as, oversized paved areas/parking lots and vacant properties, and make it a priority to use brownfield sites. The clean-up and re-use of contaminated sites would maximize the environmental and community benefits of the project, while preventing loss of community assets.

Apply context sensitive design.<sup>4</sup> We recommend incorporating structural design, materials, and artwork in station areas and access corridors that are in harmony with the community and preserve the environmental, scenic, aesthetic, historic, and natural resource values of the area. We also recommend optimizing facility safety and communications for both the user and the community, including vulnerable members (elderly, disabled, children, and those of limited English proficiency).

Apply zero or low impact development (ZID/LID). We recommend avoiding and minimizing creation of new pollution generating impervious surface. Use pervious pavement and other LID techniques for managing storm water and avoid building over ground water recharge areas. Consider de-paving areas as compensatory mitigation for any new impervious surface needed for the project to achieve no net increase in pollution generating impervious surface.

Apply green building and management practices. We recommend following the federal “green” requirements and opportunities that may apply to design, operation, and maintenance of project-related facilities and equipment, such as light rail stations and maintenance buildings. The green requirements pertain to high performance buildings, energy efficiency, and use of renewable energy, water conservation, waste diversion, stormwater runoff, and LEED certification.

- E.O. 13423, Strengthening Federal Environmental, Energy, and Transportation Management, Section 2(f); Section 2(b); Section 9(g)-(h); Section 2(c) (2007)
- E.O. 13514, Federal Leadership in Environmental, Energy, and Economic Performance (2009)
- Energy Independence and Security Act of 2007, 42 U.S.C. Section 17061 *et seq*; Section 17094; US EPA, Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act, 2009  
<https://www.epa.gov/nps/urban-runoff-low-impact-development>
- National Energy Conservation Policy Act, 42 U.S.C. Section 8253(a)(1); Section 8253(f)(1); Section 8253(f)(3)(A); Section 2(d)(i); Section 2(e)(ii) (2009)
- Energy Conservation and Production Act, 42 U.S.C. Section 6834(a)(3)(D); Section 6834(a)(3)(A) (2009)

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<sup>4</sup> <http://www.wsdot.wa.gov/Design/Policy/CSDesign.htm>

- US Green Building Council: Leadership in Energy and Environmental Design for Existing Buildings, <http://www.usgbc.org>
- US Green Building Council: LEED Public Policies, <https://public-policies.usgbc.org/>

### **Community impact assessment**

We recommend conducting community impact assessments for communities or neighborhoods that would potentially be most affected by the proposed project. These usually include communities adjacent to or bisected by a proposed project, although an analysis of the direct, secondary, and cumulative effects of proposed alternatives may reveal additional affected populations/communities. Impacts from construction, increased number and frequency of trains, safety issues, traffic delay from at-grade crossings, and other issues that may arise, need to be addressed.

The indirect and cumulative effects that would result from growth and development that may be stimulated by the proposed project should be analyzed. For example, the proposed project may stimulate transit-oriented development, commercial and residential mixed-use areas, amenities that improve walkability/livability of the area, and so on. The project could also stimulate development that has the potential to encroach upon or otherwise impact sensitive habitat areas, important community resources, or displace vulnerable or disadvantaged populations. Whether they are positive or negative, we recommend that the EIS analyze and disclose the potential environmental, social, and economic effects.

A key benefit of the indirect and cumulative effects analysis is that it may reveal outcomes that should be avoided, minimized, or otherwise mitigated. As mitigation for project stimulated effects, we encourage the project proponents to work collaboratively with local land use planning entities and affected residents to ensure that the land resource is used wisely and that environmental protections are incorporated prior to stimulating new growth. Guidance and resource materials for community impact assessment can be found at <https://www.fhwa.dot.gov/livability/cia/index.cfm>.

### **Environmental justice/vulnerable populations**

In compliance with Executive Order 12898 on Environmental Justice, actions should be taken to conduct public outreach and participation that ensures the public and Native American tribes understand the possible impacts to their communities and trust resources. Minority and low-income communities and tribes should be effectively informed, heard, and responded to regarding the project impacts and issues affecting their communities and natural and cultural resources. The scope of outreach, impacts analysis, and mitigation should also include other vulnerable populations, such as the elderly, the disabled, and children (see comments below regarding Executive Order 13045 on Children's Health and Safety). The information gathered from the public participation process and how this information is factored into decision-making should also be disclosed in the EIS. We recommend using EJSCREEN,<sup>5</sup> the EPA's environmental justice mapping and screening tool, as it combines environmental and demographic indicators that would provide additional data and analysis for the specific geographic areas affected by the proposed project.

Fish consumption from recreational fisheries may occur within the project area and is a potential environmental justice issue. Because low income and minority populations reside in the project area, it is important to be aware of any existing adverse impacts to this community and any project-related activities that could potentially exacerbate impacts.

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<sup>5</sup> <https://www.epa.gov/ejscreen/what-ejscreen>



## **Children's Health and Safety**

Executive Order 13045 on Children's Health and Safety directs that each federal agency make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children, and ensure that its policies, programs, activities, and standards address these risks. Analysis and disclosure of these potential effects under NEPA is necessary because some physiological and behavioral traits of children render them more susceptible and vulnerable than adults to health and safety risks.

Based on current EPA policy and guidance,<sup>6</sup> an analysis of impacts to children should be included in a NEPA analysis if there is a possibility of disproportionate impact on children related to the proposed action. EPA views childhood as a sequence of lifestages, from conception through fetal development, infancy, and adolescence. Therefore, exposures to children at each life stage as well as pregnant and nursing women, are relevant and should be considered when addressing health and safety risks for children.

## **Tribal consultation**

Tribal treaty resources that may be affected by the proposed project include, but are not necessarily limited to, the Usual and Accustomed fishing areas of the Muckleshoot Tribe and the Puyallup Tribe. We recommend that the EIS identify and discuss any effects to tribal treaty resources, including natural resources, historical, archaeological, or traditional cultural places of importance to affected Native American Tribes. If the proposed project would potentially have effects on tribal treaty resources, development of the EIS should be conducted in consultation with all affected tribal governments, consistent with Executive Order 13175, *Consultation and Coordination with Indian Tribal Governments*.<sup>7</sup>

## **Cumulative and indirect impacts**

The project evaluation should consider the effects of the proposed project when added to other past, present and reasonably foreseeable future projects within and outside the project area. Cumulative impacts can result from individually minor, but collectively significant actions taking place over time.

EPA has issued guidance on how we are to provide comments on the assessment of cumulative impacts in *Consideration of Cumulative Impacts in EPA Review of NEPA Documents*, which can be found on the EPA web site at: <http://www.epa.gov/compliance/resources/nepa.html>. This guidance includes five key areas of focus when assessing cumulative effects:

- Identify resources, if any, that are being cumulatively affected;
- Determine the appropriate geographic (within natural ecological boundaries) area and the time period over which the effects have occurred and would occur;
- Look at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern;
- Describe a benchmark or baseline; and
- Include scientifically defensible threshold levels.

Indirect effects are those that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, road systems and access, population

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<sup>6</sup> <https://www.epa.gov/children/epas-policy-evaluating-risk-children>

<sup>7</sup> <https://www.energy.gov/nepa/downloads/eo-13175-consultation-and-coordination-indian-tribal-governments-2000>

density or growth rate, and related effects on air and water and other natural systems, including ecosystems (40 CFR Part 1508.8).

### **Invasive species**

Ground disturbing activities create opportunity for establishment of non-native invasive species. In compliance with NEPA and with the Executive Order 13112, analysis and disclosure of these actions and their effects, as well as any mitigation to prevent or control such outbreaks should be included. We recommend that disturbed areas be revegetated using native species and ongoing maintenance (wholly or primarily non-chemical means) to prevent establishment of invasive species in areas disturbed by project activities.

### **Climate Adaptation**

The EPA recommends that the EIS include a discussion of reasonably foreseeable effects that changes in the climate may have on the proposed project and the project area, including its long-term infrastructure. This could help inform the development of measures to improve the resilience of the proposed project. If projected changes could notably exacerbate the environmental impacts of the project, the EPA recommends these impacts also be considered as part of the NEPA analysis.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
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OFFICE OF  
ENVIRONMENTAL REVIEW  
AND ASSESSMENT

May 2, 2018

Mr. Steve Kennedy, Senior Environmental Planner  
Sound Transit  
401 South Jackson Street  
Seattle, Washington 98104-2826

Dear Mr. Kennedy:

The U.S. Environmental Protection Agency has reviewed the Sound Transit Early Scoping Information Report for the Tacoma Dome Link Extension and Operations and Maintenance Facility South (EPA Region 10 Project Number 18-0020-FTA). The EPA comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Sections 1500-1508) and Section 309 of the Clean Air Act.

The Tacoma Dome Link Extension representative project is approximately 9.7 miles in length and would extend from the Federal Way Transit Center to the Tacoma Dome Station. The proposed project includes two parking garages (at south Federal Way and Fife), a rail-only fixed span bridge over the Puyallup River, a south corridor Operations and Maintenance facility, and stations in south Federal Way, Fife, east Tacoma, and the Tacoma Dome.

We appreciate the helpful online open-house information provided by Sound Transit. We offer the following comments based on the information available at this early stage of project development.

**Purpose and Need, Goals and Objectives**

We support the project purpose and need. We especially encourage special emphasis be placed upon serving and improving the quality of life for the high concentrations of low income, minority, vulnerable, disadvantaged, and transit-dependent populations within the project area. We recommend that Sound Transit adopt a goal, with supporting objectives, for improving public health and human well-being in communities that are already experiencing a disproportionate level of social, environmental, health, and economic impacts. A well-located and designed project that minimizes negative impacts from project construction, operations, and maintenance, and integrates multi-modal transport, particularly non-motorized modes, with uplifting design features, access to open spaces, and diverse natural vegetated areas could contribute to community placemaking and improved public health.<sup>1</sup>

We also recommend children's health and safety be a prominent consideration. While public transportation via light rail should produce net benefits to communities served, it is important to be attentive to its location, construction, and operational impacts to ensure that the most disadvantaged and vulnerable populations are not disproportionately and cumulatively affected by project impacts. For example, using the EPA EJSCREEN GIS tool to assist with an analysis of the representative alignment, we find there are many schools nearby that are currently experiencing impacts from Interstate 5 and

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<sup>1</sup> <http://www.placemakers.com/2018/04/03/healthiest-neighborhoods-both-walkable-and-green/>

other roadways. We would expect additional air pollution, noise, safety, and other impacts to schools and the surrounding communities from the Tacoma Dome Link Extension project construction activities, as well as the impacts from system operations and maintenance. Of particular concern are the air quality impacts from construction diesel emissions, other particulate matter, noise impacts to learning and residential environments, and the need for safe routes to schools. We also recommend project communications be in the appropriate languages for affected populations and issued through culturally appropriate means.

### **Range of Alternatives**

We support the measures and considerations for developing alternatives, which are listed in the Early Scoping Information Report. In addition to the representative alignment, we recommend the range of alternatives include one or more routes along SR 99. An SR 99 route could support existing communities in terms of access, walkability, and transit oriented development. We also recommend the Operations and Maintenance Facility South location alternatives be within existing commercial/industrial/paved areas. Consider, too, whether there are brownfield sites that could be re-developed for this beneficial use.

### ***Recommendations:***

- Strive to incorporate both equity and health, including children's health and safety, considerations in evaluating project alternatives, design, and construction/operations/maintenance impacts;
- To improve equity, health, community and economic vitality, clean up and re-use any contaminated sites that may occur within proposed alignments;
- Identify and incorporate the needs of Limited English Proficiency (LEP) residents in project alternatives, design, construction, operations, and maintenance. For example, there is a substantial Korean LEP population in Tacoma. When the Portland light rail service began, LEP was found to be a contributing factor in an alarming number of deaths due to train strikes. Consider using faith-based means (churches) for access, communication, and outreach to these populations. Learn and incorporate varied ways to effectively communicate operational and safety factors for LEP and disabled persons;
- In response to the limited environmental screening presented in the Early Scoping Information Report, we support alternatives that both serve Environmental Justice/disadvantaged and underserved neighborhoods, and that would avoid negative impacts to habitat corridors, existing open/green spaces, and sensitive natural areas. More information is needed to determine the potential positive and negative effects of alignments that would pass through historic districts, parks, tribal lands, or other important social, cultural sites;
- Provide efficient, convenient connections with other public transportation routes and modes, including non-motorized travel, to lessen dependency on private automobiles, increase accessibility for underserved populations, reduce greenhouse gases and other air pollution. We have found that it is important to monitor current connections, such as between commuter rail and light rail, to evaluate the ease of making these connections;
- Examine the travel time and effort, particularly for the disabled, that are necessary to make these connections, and whether frequency of service is adequate to achieve transport that is both time and cost effective. Use monitoring results to inform planning and alternatives for the Tacoma Dome Link Extension;



- Continue to seek and evaluate ways that the Tacoma Dome Link Extension could leverage additional benefits to and from other current housing, commercial, and transportation investments; and,
- Ensure effective government to government consultation and coordination with affected Indian tribes, in accordance with Executive Order 13175. Incorporate provisions to ensure protection of tribal treaty rights and resources.

A general list of other environmental, transportation, and community impacts and benefits that we recommend be considered in developing alternatives and discussed in the NEPA analysis include, but are not necessarily limited to:

- Aquatic resources – effects to watersheds, hydrology, runoff; water quality and quantity for surface water, ground water, private or public drinking water supplies; effects to rivers, streams, wetlands, shorelines, riparian areas, lakes, ponds, estuaries, floodplains, marine waters; effects to waters listed as impaired under Clean Water Act Section 303(d); Clean Water Act anti-degradation provisions;
- Endangered, threatened, candidate, sensitive federal or state species and habitats; local areas of high biological diversity;
- Indirect and cumulative effects – to human health and/or environmental/natural resources of concern;
- Open space – greenways, parks, resource lands, wildlife areas, other valued public and/or open spaces;
- Ecological connectivity – need to provide for and/or effects upon existing habitat areas and corridors;
- Changes in climate – discuss impacts both on the project and from the project related to greenhouse gas emissions and adaptation; and,
- Air quality – transportation related emissions of criteria air pollutants and mobile source air toxics; construction-related emissions.

We would be happy to provide more detailed information regarding any of the above subjects. If at any time you have questions, would like to discuss these comments, or need information please contact me at (206) 553-2966, or by email at [somers.elaine@epa.gov](mailto:somers.elaine@epa.gov). Thank you for the opportunity to contribute to the early scoping phase of the Tacoma Dome Link Extension project.

Sincerely,



Elaine L. Somers  
Environmental Review and Sediment Management Unit

## 2. SITE LOCATION AND DESCRIPTION

### 2.1 SITE LOCATION

The CB/NT Superfund site is located in Tacoma, Washington at the southern end of the main basin of Puget Sound (Figure 1). The site encompasses an active commercial seaport and includes 10-12 square miles of shallow water, shoreline, and adjacent land, most of which is highly developed and industrialized. The upland boundaries of the site are defined according to the contours of localized drainage basins that flow into the marine waters. The marine boundary of the site is limited to the shoreline, intertidal areas, bottom sediments, and water of depths less than 60 feet below mean lower low water. The nearshore portion of the site is defined as the area along the Ruston shoreline from the mouth of City Waterway to Pt. Defiance. The tideflats portion of the site includes the Hylebos, Blair, Sitcum, Milwaukee, St. Paul, Middle, Wheeler-Osgood, and City waterways; the Puyallup River upstream to the Interstate-5 bridge; and the adjacent land areas. Because the landward boundary of the CB/NT site is defined by drainage pathways rather than political boundaries, the precise landward extent of the site may be adjusted as new information regarding surface water and groundwater flow patterns is developed.

### 2.2 CURRENT LAND USE

The CB/NT site is located within the city of Tacoma, which has a population of 162,100. The land, water, and shoreline within the study area are owned by various parties, including the state of Washington, the Port of Tacoma, the city of Tacoma, Pierce County, the Puyallup Tribe of Indians, and numerous private entities. Much of the publicly owned land is leased to private enterprises. Within the site boundaries, land use is chiefly industrial and commercial.

The Port of Tacoma owns approximately 35-40 percent of the 2,700 acres that make up the port and industrial areas within the CB/NT site. The port operates many cargo handling and storage facilities along the waterways and leases other properties to large and small industrial, manufacturing, and commercial tenants. Many of the remaining properties within the port and industrial area were under port ownership at one time, but have since been sold. Major private landowners include lumber, chemical, and petroleum companies. Property along the Hylebos Waterway is owned almost exclusively by private companies, and there are several privately-owned parcels along the Blair Waterway. Other privately owned parcels are found predominantly at the landward end of the port and industrial area.

A large portion of the tideland and offshore areas of the CB/NT site is either owned outright by the state or is designated as state-owned harbor areas. The Port of Tacoma owns tidelands and bottom sediments in several areas including the head of Hylebos Waterway, the head of Blair Waterway, and Milwaukee and Sitcum waterways. The St. Paul and Wheeler-Osgood waterways are privately owned. Private ownership of shorelines and intertidal areas in many portions of the site generally corresponds with ownership of the adjacent upland property parcels.

The Puyallup Tribe of Indians has asserted title to land in the Tacoma tideflats area, including former Puyallup River bottomland and filled tidelands adjacent to the Puyallup Reservation. Negotiations among the Puyallup Tribe of Indians, the federal government, the state of Washington, the Port of Tacoma, and other affected parties were completed during the summer of 1988 to resolve various land ownership issues. The settlement agreement was approved on 27 August 1988 by tribal members and by federal, state, and local governments. On 21 June 1989, the Puyallup Tribe of Indians Settlement Act of 1989 was signed into law by the President, incorporating the August 1988 settlement agreement and technical documents. Efforts are underway to implement the terms of the agreement, which adds to the tribe's land base and provides for substantial restoration and enhancement of fisheries resources. Several large parcels of property within the

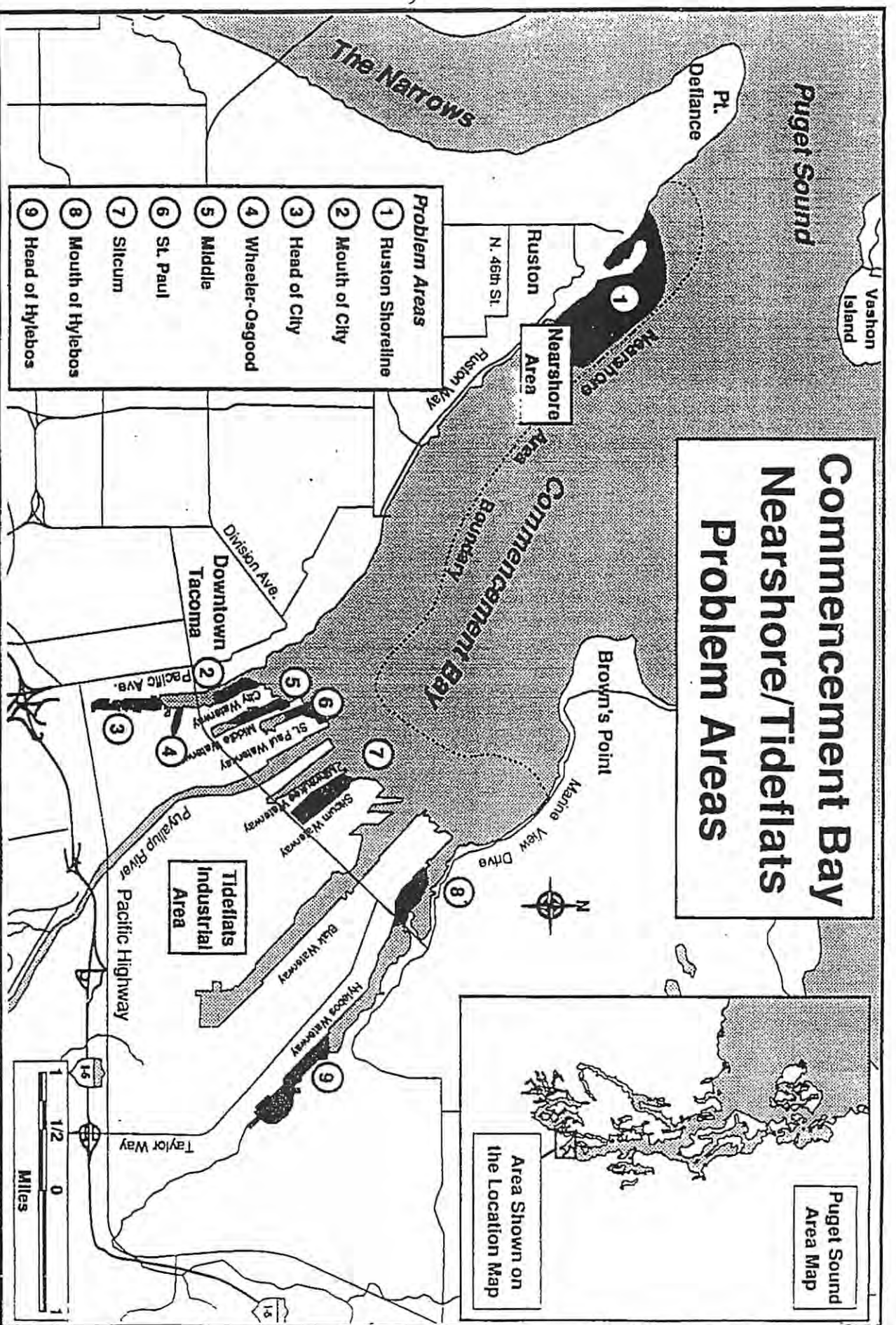


Figure 1. Commencement Bay Nearshore/Tideflats study area



**From:** Sterner, Matthew (DAHP) <[Matthew.Sterner@DAHP.WA.GOV](mailto:Matthew.Sterner@DAHP.WA.GOV)>

**Sent:** Tuesday, May 7, 2019 12:10:20 PM

**To:** Borbe, Elma

**Cc:** Borth, Holly (DAHP)

**Subject:** Comments Requested on Tacoma Dome Link Extension Project: EIS Scoping, due May 1, 2019

Good Afternoon Elma,

And thank you so much for your patience . . . it's been a very busy time here at the DAHP!!

If it's alright, I'm going to synthesize Holly and my comments in this email, rather than creating a formal letter. If you would like a formal letter on DAHP letterhead, let me know and I can transfer the information and resubmit.

Archaeologically: There really are no super "hot button" issues when it comes to the archaeology. The areas that would be identified as "high probability areas" would be the Hylebos Creek drainage and the Puyallup River Crossing areas. Other than that, there aren't any archaeological districts or large known sites associated with any of the proposed alignments. Be aware however, that if the track is elevated, there will be a concern for deeply buried sites once you extend down into the Tacoma area and our expectation will be that trestle locations will have to be deeply investigated. So a program of geotech boring is presumed.

From a built environment perspective, I am attaching Holly's comments for you:

I just have one general comment:

Due to the history of the Old Pacific Highway/Pacific Highway E, DAHP believes several historic properties (primarily commercial and residential buildings) will be identified along the alternatives that cover that road alignment; at this time, none appear in WISAARD, but a few are known informally among DAHP staff and the potential for more is high. The project poses potential indirect effects to the setting of these potential properties, at the very least. These effects may be avoided or minimized depending upon how the project would be incorporated into the existing transportation network; they may also be avoided or minimized by selecting the alternative that does not extend along Pacific Highway.

So Elma, do let me know if you'd like this information in a different format. Otherwise, thanks for your patience and let me know if you have any questions.

Cheers.

Matthew Sterner | Transportation Archaeologist  
360.586.3082 (o) | [matthew.sterner@dahp.wa.gov](mailto:matthew.sterner@dahp.wa.gov)

Department of Archaeology & Historic Preservation | [www.dahp.wa.gov](http://www.dahp.wa.gov)  
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PO Box 48343 | Olympia WA 98504-8343





STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 1, 2019

Elma Borbe, Senior Environmental Planner  
Environmental Affairs and Sustainability  
Sound Transit  
401 South Jackson Street  
Seattle, WA 98104

**Re: Sound Transit Tacoma Dome Link Extension (TDLE) Project  
Ecology SEPA #201901691**

Dear Elma Borbe:

Thank you for the opportunity to comment on the Determination of Significance and Scoping Notice (DS/Scoping) for the TDLE Project as proposed by Sound Transit (Central Puget Sound Regional Transit Authority) located from Federal Way to the Tacoma Dome, in King County and Pierce County.

The Department of Ecology (Ecology) has reviewed the information provided by Sound Transit and Ecology's previous comments submitted May 3, 2018 on the early scoping notice, still apply to the project described (see enclosure). After further review, Ecology has the following additional comment(s):

**AIR QUALITY PROGRAM, CLIMATE POLICY SECTION:  
Gail Sandlin (360) 407-6860**

Request for Comments on Scope of EIS. The lead agency identified areas for discussion in the EIS. This did not include "construction" and "operation" phase greenhouse gas emissions nor did it include a discussion of climate adaptation concerns such as risk of severe weather events, flooding, landside risks etc.

The "Level 2 Alternatives Evaluation Report" only briefly mentions on page ES-5 and 1-7, reduction of VMT as a strategy to mitigate greenhouse gas emissions. While this is true, the Scope of the EIS should address the greenhouse gas emissions of the project itself, including management of climate resilience strategies.

**WATER QUALITY/WATERSHED RESOURCES UNIT:  
Chris Montague-Breakwell, Unit Supervisor (360) 407-6364**

The following comments from Ecology's Water Quality Program and are in reference to the construction activities for the proposed TDLE Project:

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Construction Stormwater General Permit:

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
  - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
  - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
  - b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted.

You may apply online or obtain an application from Ecology's website at:

<http://www.ecy.wa.gov/programs/wq/stormwater/construction/> - **Application**. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

Elma Borbe, Senior Environmental Planner

May 1, 2019

Page 3

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(MLD:201901691)

Enclosure

cc: Gail Sandlin, AQP/GHG  
Chris Montague-Breakwell, WQ  
Eva Barber, TSP/TSP



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DEPARTMENT OF ECOLOGY

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May 3, 2018

Steve Kennedy, Senior Environmental Planner  
Sound Transit  
401 South Jackson Street  
Seattle, WA 98104-2826

Dear Mr. Kennedy:

Thank you for the opportunity to comment on the early scoping for the Tacoma Dome Link Extension and Operations and Maintenance Facility South Project located from Federal Way to Tacoma Dome in King County and Pierce County. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**AIR QUALITY/GREENHOUSE GASES: Gail Sandlin (360) 407-6800**

Construction and operation GHG emissions should be estimated. Plus considerations of climate adaptation issues such as severe weather events for flooding or landslide risks.

**TOXICS CLEANUP: Eva Barber (360) 407-7094**

Portions of this proposed project are located in an area that may have been contaminated with heavy metals due to the air emissions originating from the old Asarco smelter in north Tacoma (visit Ecology's Tacoma Smelter Plume map search tool: <https://fortress.wa.gov/ecy/smeltersearch/>).

Soil contamination from the former Asarco smelter poses a risk to human health and the environment. Children are at especially high risk from direct exposure to contaminated soil. Construction workers, landscapers, gardeners, and others who work in the soils are also at risk.

Ecology recommends that the lead agency include the following as conditions of approval, prior to the issuance of any site development permits or the initiation of grading, filling, or clearing:

- Sample the soil and analyze for arsenic and lead following the [2012 Tacoma Smelter Plume Guidance](#). The soil sampling results shall be sent to Ecology for review. If the

project includes open space areas, contact the Technical Assistance Coordinator, Eva Barber, for assistance in soil sampling methodology within the open space area.

- If lead or arsenic are found at concentrations above the Model Toxics Control Act (MTCA) cleanup levels (Chapter 173-340 WAC); the owners, potential buyers, construction workers, and others shall be notified of their occurrence. The MTCA cleanup level for arsenic is 20 parts per million (ppm) and lead is 250 ppm.
- If lead, arsenic and/or other contaminants are found at concentrations above MTCA cleanup levels, the applicant shall:
  - 1) Develop soil remediation plan and enter into the Voluntary Cleanup Program with Ecology. For more information on the Voluntary Cleanup Program, visit Ecology's website at: <http://www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm>.
  - 2) Obtain an opinion letter from Ecology stating that the proposed soil remediation plan will likely result in no further action under MTCA. The applicant shall provide to the local land use permitting agency the opinion letter from Ecology.
  - 3) Prior to finalizing site development permits, provide to the local land use permitting agency "No Further Action" determination from Ecology indicating that the remediation plans were successfully implemented under MTCA.
- If soils are found to be contaminated with arsenic, lead, or other contaminants, extra precautions shall be taken to avoid escaping dust, soil erosion, and water pollution during grading and site construction. Site design shall include protective measures to isolate or remove contaminated soils from public spaces, yards, and children's play areas. Contaminated soils generated during site construction shall be managed and disposed of in accordance with state and local regulations, including the Solid Waste Handling Standards regulation (Chapter 173-350 WAC). For information about soil disposal contact the local health department in the jurisdiction where soils will be placed.

The link below provides a fact sheet that explains more how the arsenic and lead clean-up levels were set and why Ecology sees that they are protective for human health:

<https://fortress.wa.gov/ecy/publications/SummaryPages/1109095.html>.

For assistance and information about Tacoma Smelter Plume and soils contamination, the applicant shall contact, Eva Barber with the Toxics Cleanup Program at (360) 407-7094 or via email at [Eva.Barber@ecy.wa.gov](mailto:Eva.Barber@ecy.wa.gov).

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.



Steve Kennedy, Senior Environmental Planner  
May 3, 2018  
Page 3

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(MLD:201801574)

cc: Gail Sandlin, AQ/GHG  
Eva Barber, TCP



HILARY S. FRANZ  
COMMISSIONER OF PUBLIC LANDS

DEPARTMENT OF  
NATURAL RESOURCES

SOUTH PUGET SOUND REGION

950 FARMAN AVENUE N  
ENUMCLAW, WA 98022-9282

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April 23, 2019

Mr. Perry Weinberg  
Sound Transit, Deputy Executive Director  
Office of Environmental Affairs and Sustainability  
401 S. Jackson Street  
Seattle WA 98104-2826

Subject: Comment on the Future Tacoma Dome Link Extension and Link Light Rail (East Link Extension, Redmond-Seattle-Mariner) per EIS Scoping

Mr. Weinberg:

Thank you for the opportunity for DNR to provide comments on the expansion of the Sound Transit Link Light Rail Transit Service from the Federal Way Transit Center to Tacoma Dome Station Area. At this time, the proposal does not impact aquatic lands owned by the State of Washington and managed by DNR, therefore no authorization is required for your proposed activity.

However based upon Exhibit 2 (see attached) within document entitled "*Tacoma Dome Link Extension*" dated April 2019; it does appear that the Future East Link Light Rail (Redmond-Seattle-Mariner) will be located on and/or over **bedlands, harbor areas, and shorelands of Lake Washington and Mercer Slough**, owned by the State of Washington and managed by DNR. You must obtain authorization from DNR prior to building structures in the water and air space above state-owned aquatic lands or to harvest seaweed, shellfish, sand, or other resources for commercial use. The DNR will need additional information in the form of a JARPA (Joint Aquatic Resources Permit Application), and possibly a site visit in order to identify measures necessary to avoid environmental impacts.

The Department of Natural Resources is steward of Washington's aquatic lands and their resources. Aquatic lands are managed for current and future citizens of the state to sustain long-term ecosystem and economic vitality, and to ensure access to the aquatic lands and the benefits derived from them. Washington DNR's management authority derives from the State's Constitution (Articles XV, XVII, XXVII), Revised Code (RCW 79.02 and 79.105) and Administrative Code (WAC 332-30). As proprietary manager of state-owned aquatic lands, DNR has been directed to manage the lands "...for the benefit of the public" in a manner that provides "...a balance of public benefits for all citizens of the state" that includes"

Mr. Perry Weinberg  
Sound Transit, Deputy Executive Director  
Office of Environmental Affairs and Sustainability  
April 23, 2019  
Page 2 of 2

- Encouraging direct public use and access
- Fostering water-dependent uses
- Ensuring environmental protection, and
- Utilizing renewable resources.

In addition, generating revenue in a manner consistent with subsections 1) through 4) of this section is a public benefit (RCW 79.105.030).

To ensure sustainable management of state-owned aquatic lands, DNR has established environmental protection goals. These goals seek to ensure uses of state-owned land do not result in: shading that harms aquatic vegetation and fish migration; compaction, disruption, or impeding the natural movement of sediments; underwater noise that can disrupt important aquatic species when they are most vulnerable; or, release harmful contamination and waste. DNR is committed to working with applicants, in coordination with permitting agencies, to find ways to avoid impacts to aquatic habitats and species on state-owned aquatic land.

If you have not already submitted an application (JARPA) to authorize state-owned aquatic lands, please contact me Sherri Gallant, Easement Manager at (206) 455-1014 or [sherri.gallant@dnr.wa.gov](mailto:sherri.gallant@dnr.wa.gov). I will provide you with an application and discuss the authorization process before you apply for permits. I am also available to meet with regulatory agencies to discuss the proposal in an effort to meet mutual goals while avoiding unnecessary expense or delays in the review of project proposals. Please do not hesitate to call should you need additional information, or to arrange a meeting.

The DNR reserves the right to comment on future amendments and revisions to this proposal.

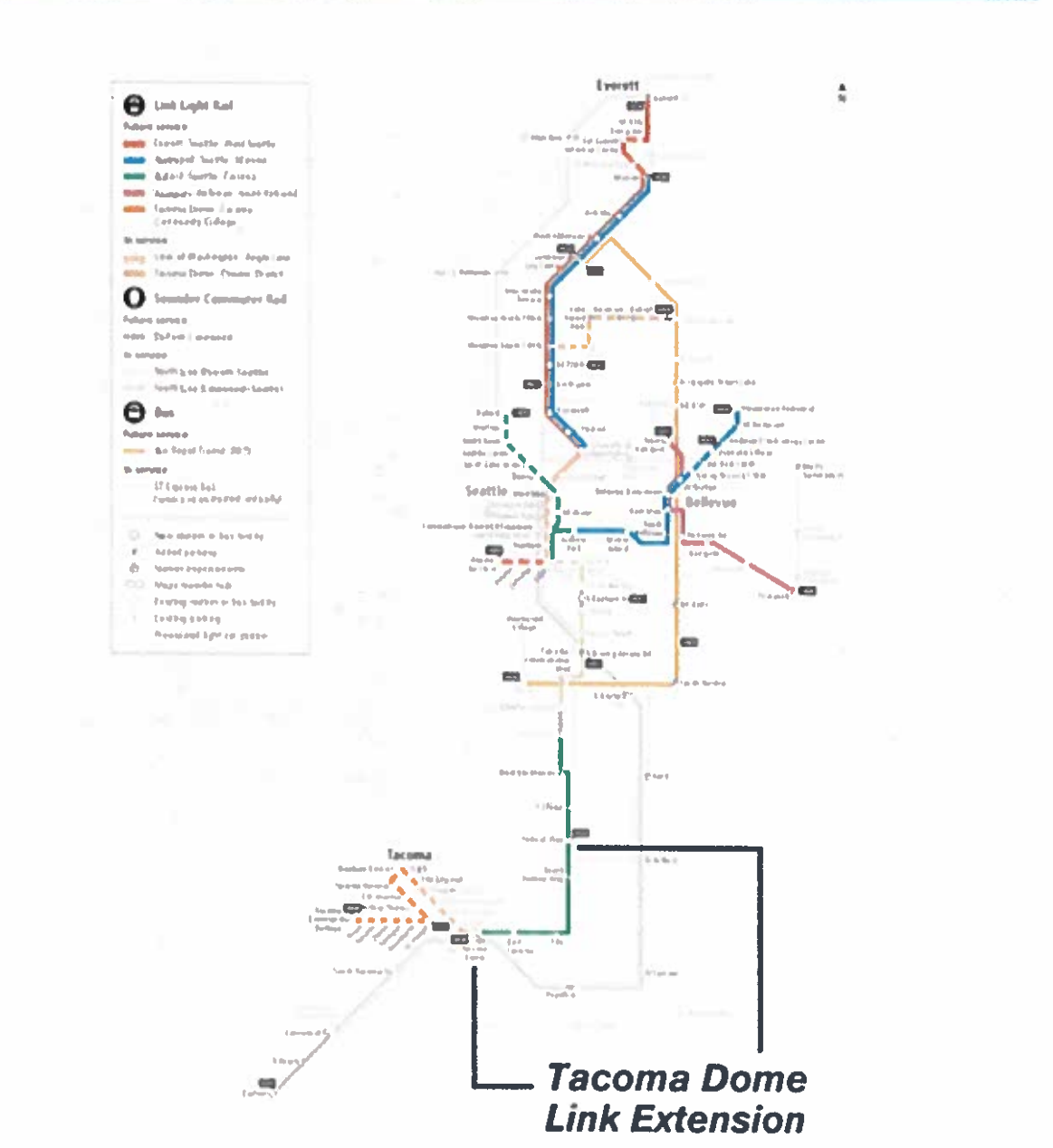
Sincerely,



Sherri Gallant  
Department of Natural Resources (DNR), Easement Manager  
Aquatics Shoreline District  
950 Farman Avenue North  
Enumclaw, WA 98022-9282

Enclosures

c: District file  
Aquatic Resource File



**Exhibit 2 Regional System Map**

May 1, 2019

Sound Transit, Tacoma Dome Link Extension Project  
c/o Elma Borbe, Senior Environmental Planner  
401 S Jackson St., Seattle, WA 98104

**RE: Tacoma Dome Link Extension (TDLE) EIS Scoping Comments**

The Washington State Department of Transportation (WSDOT) is pleased to provide comments for the Tacoma Dome Link Extension (TDLE) project Scoping Information Report. The project aligns with WSDOT's vision of providing a sustainable and integrated multimodal transportation system, including working with local transit agencies to provide transportation choices. WSDOT's strategic goals include optimizing transportation system capacity through the better interconnectivity of all transportation modes and managing system assets and multimodal investments on corridors to enhance economic vitality.

**General Comments:**

The TDLE project presents an exciting opportunity for Sound Transit to collaborate with the Puyallup Tribe of Indians, cities and counties, other transit agencies as well as federal agencies to build a seamless, integrated transit system. An integrated transit system supports regional centers designated by the Puget Sound Regional Council (PSRC) and the projected growth in population and employment throughout the region. The TDLE project supports these goals by providing reliable connections and increased transportation options between communities in Pierce County and South King County as well as connecting to the wider Central Puget Sound region.

WSDOT fully supports the Purpose and Need Statement and encourages the TDLE project to continue working with local jurisdictions to develop safe and direct active transportation (e.g. walking, bicycling, etc.) access to future light rail stations and to encourage Transit Oriented Development (TOD) in station areas. Station area planning and design should be context sensitive and not "one size fits all". Working with partnering agencies and the community to develop practical solutions increases the likelihood of a successful project.

It is probable that the comments we make now are applicable for the current situation and maybe even as far in the future as the next several decades, but we should be forward thinking enough to plan for the light rail stations & alignment to be functional in 75 years when much of the area will most likely be substantially redeveloped.

**WSDOT Coordination:**

WSDOT will continue to coordinate with the TDLE project. The TDLE project team has provided first drafts of the Light Rail and I-5 Compatibility Report and the Puyallup River Crossing Feasibility Report. The Compatibility Report is based on the project "Representative Alignment" and describes how the light rail alignment can be integrated with the existing freeway as well as any potential future expansion of I-5. The Compatibility Report also identifies where the light rail alignment cannot be accommodated within the I-5 right of way. Projects including the I-5/SR 161/SR 18 Triangle project and the SR 167 Completion Project are also included in the report.



WSDOT also looks forward to continuing collaboration with the TDLE project team on the SR 167 Completion Project, the I-5 Southbound High Occupancy Vehicle (HOV) Project and the I-5/SR 161/SR 18 Triangle Project.

As the TDLE project team refines the alignment options that will be analyzed in the Environmental Impact Statement (EIS) process, WSDOT looks forward to continued collaboration and the production of an updated Compatibility Report.

Other areas of coordination that WSDOT expects to be addressed in the EIS include:

- Existing noise walls within WSDOT right of way
- Resource Conservation Areas
- Federal court injunction fish passage sites – checking for sites not yet listed in injunction, preliminary hydraulics report to show TDLE will not preclude WSDOT (or make more expensive) from fixing blockages in future

### **Potential EIS Alternatives**

#### **South Federal Way Station Area:**

The SF 8 and SF 9 station options are adjacent to I-5 and have lower potential property impacts; however, because of their location, these sites have a limited watershed and TOD potential compared to the sites that are further west away from I-5. The SF 2 west, SF 4C and SF 4D options all have greater TOD potential as well as better multimodal access.

#### **Fife Station Area:**

The Fife station options all support the city's proposals to redevelop its city center around the future light rail station and therefore would have minimal impact on the I-5 right of way. WSDOT encourages the project team to work with the city to ensure that good pedestrian access to the station. Extensive soil analysis is required to verify conditions for the light rail alignment and if redevelopment were feasible as previous experience has shown that there are poor soil conditions in the area and potential climate change impacts to low-lying areas.

As the alignment heads west toward the Puyallup River, there is no room in the right of way of I-5 or SR 99 (depending on alignment) to accommodate the light rail guideway so acquisition of private property will be necessary. WSDOT encourages the project team to coordinate closely with the Puyallup Tribe in this area.

#### **East Tacoma Station Area:**

All of the station options are north of I-5, on the opposite side to the low-income East Tacoma neighborhood and the Emerald Queen casino currently under construction. The project team should continue working with WSDOT's I-5 Southbound HOV Project and the City of Tacoma to address the current poor pedestrian environment (with poor lighting and narrow sidewalks) along Portland Avenue under I-5, which forms a significant barrier for people who would want to walk or bicycle to the station.

The station options that are closer to I-5 (ET 3A, ET 3B, and ET 5) all have a shorter distance to destinations on the south side of I-5.

#### **Tacoma Dome Station Area:**

The Tacoma Dome potential station locations are all outside of I-5 or any other state right of way, therefore WSDOT has no comments on possible right of way impacts. WSDOT encourages the TDLE project to optimize the transfer opportunities between Tacoma Dome Link Extension Light Rail, Tacoma Link Light Rail, Pierce Transit buses, Sounder commuter rail and Amtrak at the Tacoma Dome station. Transfers between the different transit modes at this station should be safe, direct and easy to understand for all users. The TD 2 alternative is the best for addressing the multimodal access and transfer opportunities at this location.

**Topics to be addressed in the EIS**

Under the list of environmental elements that will be studied in the EIS, we assume that the Ecosystems topic will include Endangered Species Act (ESA) species, the Migratory Bird Treaty Act and the Golden Eagle Protection Act. Please clarify whether the Water Resources topic cover wetlands and jurisdictional ditches that will be impacted in the WSDOT right of way.

Thanks again for the opportunity to comment. WSDOT looks forward to continuing interaction with The TDLE project going forward.

Sincerely,



Celeste Gilman, WSDOT Regional Transit Coordination Division (RTCD) Deputy Director  
[GilmanC@WSDOT.WA.GOV](mailto:GilmanC@WSDOT.WA.GOV) (206) 464-1219

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April 30, 2018

Ms. Elma Borbe  
Tacoma Dome Link Extension  
Sound Transit  
401 S. Jackson Street Seattle, WA 98104

VIA EMAIL: [TDLEScoping@soundtransit.org](mailto:TDLEScoping@soundtransit.org)

**Re: Tacoma Dome Link Extension EIS Scoping Comments**

Dear Ms. Borbe,

On behalf the Port of Tacoma (Port) and Northwest Seaport Alliance (NWSA), thank you for the opportunity to provide scoping comments for the NEPA/SEPA environmental review.

In 1918, the Port of Tacoma was authorized by the citizens of Pierce County to serve as a public port authority, charged with serving as an economic engine for Pierce County. In 2015, the ports of Seattle and Tacoma formed a marine cargo operating partnership, the NWSA. Today, the Alliance is the fourth-largest container gateway in North America.

The Port and Alliance operate and maintain maritime and industrial facilities to fulfill their mission of generating economic growth. They protect, and grow, the 58,400 of family-wage jobs and \$12.4 billion in economic impact that depend on these facilities. The Port and NWSA are essential public facilities of statewide significance, serving as critical export and import gateways for agricultural producers and manufacturers across Washington. They cannot be replicated elsewhere and serve a crucial role in the economies of Pierce County and the state.

We fully support high capacity transit as a means to reduce congestion along the I-5 corridor. An integrated, multimodal transportation system is essential to maintaining Puget Sound's economic competitiveness and quality of life. This includes making sure that the future TDLE line avoids negative effects on, and allows for future improvements to, truck and rail access to the Port of Tacoma Manufacturing Industrial Center.

Our interests are encapsulated in a single objective for the Tacoma Dome Link Extension project:

- Improve regional transportation for personal mobility, while protecting maritime and industrial land uses and freight mobility.

This affects the station locations in Fife and East Tacoma, and the river crossing.

We appreciate Sound Transit's broad stakeholder engagement in the development of alternatives for the Tacoma Dome Link Extension, and the direct engagement with our staff, who look forward to continuing exchange and cooperation.

The accompanying document, prepared by our staff, outlines the areas where a thorough review of proposed alignments is necessary to determine potential negative impacts on the public benefit the Port and the NWSA are charged with providing.

Sincerely,



Jonn Waire  
Chief Executive Officer  
Northwest Seaport Alliance



Stephen P. Metruck  
Executive Director  
Port of Seattle

Cc: Sound Transit CEO Peter Rogoff  
Port of Seattle Commission  
Port of Tacoma Commission  
NWSA Managing Members

## **ATTACHMENT A**

Thank you for the opportunity to provide these scoping comments, and for our inclusion in the EIS process as participating agency. We have been involved throughout the ST3 Sound Transit planning process since the 2016 ST3 Long Range Plan Update. We support Sound Transit's investment in the regional transit system, and appreciate the potential for improved personal mobility to Port facilities. However, we remain concerned about the potential for unintended negative effects on freight traffic at the Fife and East Tacoma stations, and potentially, the river crossing. The Port and NWSA are encouraged by the project's potential to protect maritime and industrial land uses and freight mobility by improving the efficiency of the people transportation system in Tacoma, Fife, and the region. Potential benefits include: (1) avoiding negative effects on critical freight transportation routes, (2) providing improved personal mobility access to port cargo facilities, and (3) anticipated improvements in the vehicle flows on truck freight routes supporting our facilities, and freight mobility in region in general.

Our comments parallel those in our SEPA Early Scoping letter from 3/5/18, as well as comments from our Level 2 Alternatives Development letter to members of the Elected Leadership Group from 10/10/18. We request that the DEIS comprehensively analyze the issues raised in this, as well as these previous letters. It should identify potential effects, along with opportunities to modify the project plans to avoid or minimize negative effects on freight mobility. Our comments cover the following items listed in the Scoping Information Report:

1. Purpose & Need
2. Potential Alternative Alignments – issues, concerns, areas of agreement, options  
Comments relative to all three alternatives
  - 2.1 Fife Station
  - 2.2 Puyallup River Crossing
  - 2.3 East Tacoma Station
3. Elements of the Environment

### **1. PURPOSE & NEED**

We generally support the Purpose and Need statement. We expect that in the EIS document, Sound Transit will recognize the Port's mission, and communicate how it can deliver and operate the light rail extension in a manner that is compatible with existing public purposes for which the Port and the NWSA are responsible.

Under state legislation, Pierce County citizens voted in 1918 to create the public Port of Tacoma – a special purpose municipal corporation, to ensure that facilities in the Tacoma harbor were managed for the benefit of all citizens. Our mission is to create good jobs across the state by advancing trade and commerce, promoting manufacturing and maritime growth, and stimulating economic development. The GMA recognized the importance of our facilities by designating them as essential public facilities.

The critical economic role of the facilities comprising the NSWA was reinforced by the 2009 inclusion of the requirement for a Container Port Element, RCW 36.70A.085, for the Cities of Seattle and



Tacoma. This amendment to the GMA showed legislative support for the continued economic development generated by Washington's major ports by declaring that:

"It is the intent of the legislature to ensure that local land use decisions are made in consideration of the long-term and widespread economic contribution of our international container ports and related industrial lands and transportation systems, and to ensure that container ports continue to function effectively alongside vibrant city waterfronts."<sup>1</sup>

Tacoma's Container Port Element was finalized by the City of Tacoma in 2014. See in particular Goal CP-6, which calls for the protection and preservation of infrastructure and services needed for the efficient movement of goods between the Port and the regional transportation system, and Policy CP-1.6, which calls for protecting land near the Port with zoning compatible with port-related activities.

As these GMA elements illustrate, to be successful in our mission, it is critical for other jurisdictions and government agencies like Sound Transit to recognize the complicated nature of our operations, and to collaborate closely when major projects could impact our assets. As the project includes stations on or near freeway access routes for one of the region's largest and most productive industrial zones (Manufacturing/Industrial Centers [MICs]). Therefore, it is Sound Transit's interest to ensure that no harm will come to facilities and operations essential to delivery of the Port's and NWSA's mission.

Pursuant to the authority and mission referenced above, the Port of Tacoma has engaged in extensive local planning efforts to develop the Port's Strategic Plan to articulate how the Port will deliver its mission. The Plan lays out a vision that is built on existing strengths, including proximity to the Pacific Rim and Alaska, naturally deep waterways, a superior intermodal rail network, existing terminal infrastructure and adjacent undeveloped land for expansion.

Similarly, the NWSA operates under a Strategic Business Plan outlining how we'll address the competitive challenges to grow cargo volumes, create jobs and improve financial performance.

As the Link extension passes the Port of Tacoma MIC, planning, design and construction must respect the vitality and economic contributions of the maritime and industrial economic sectors. The transportation system in our region must move both passengers and freight efficiently and safely. As the Puget Sound region invests in improving passenger mobility through Link extensions, we must not impede existing industrial capacity and capability and should not foreclose future industrial facilities and operations. In this context, it is essential to note that:

- Port and NWSA facilities cannot be moved or replicated elsewhere, due to their very nature.
- Existing freight mobility (across all modes: road, rail, marine) must be maintained, and the project designed to not pre-empt future improvements to freight infrastructure.
- MIC employment densities are lower than those in other regionally- and locally-designated Centers, and do not support traditional transit-oriented-development densities.
- Traditional transit-oriented development (TOD) approaches, which typically include housing, are not appropriate in close proximity to a MIC since new residential development would be exposed to noise, fumes, air and light pollution.

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<sup>1</sup> RCW 36.70A.85, (Findings—Intent—2009 c 514.)

Several Purpose bullets reference adopted regional and local plans and consistency with local land use plans and policies, and under those references it is important to acknowledge the unique policies and zoning intended to protect and grow industrial and maritime centers.

The current Purpose includes eight bullet points, which are all important. In keeping with our comments above, we propose amending the eighth bullet, and adding a ninth:

- “Preserve and promote a healthy environment and economy by minimizing adverse effects on the natural, built, and social environments through complementary design and sustainable practices.”
- Recognize other critical public institutions and purposes by partnering effectively to plan, deliver, and operate the project in a manner that is compatible with existing and planned economic development uses within the Port of Tacoma Manufacturing Industrial Center, and the freight infrastructure that supports them.

These additions to the Purpose statement would help ensure that the potential freight mobility and land use effects of the East Tacoma Station, which is located in an industrial area alongside a major freight corridor are adequately addressed in the final station location and design.

## **2. Potential Alternative Alternatives**

The Port and the Alliance support the extension of a truly regional high capacity transit system to the Tacoma Dome. We appreciate the planning efforts to date, including the time ST staff committed to listening to, and addressing our issues and concerns. Based on our assessment of the materials provided to date, here are our immediate concerns for the EIS related to the two station areas, and the crossing of the Puyallup River, that were also the focus of past comments:

### **2.1 Fife Station**

We appreciate prior analytical work that led to the elimination of station locations that could have had significant effects on traffic circulation at the 54<sup>th</sup> St/I-5 Interchange. However, we remain concerned that traffic related to the remaining station locations (1, 3 and 4) still has the potential to affect overall traffic congestion and freight mobility in the area. The EIS should evaluate freight effects at a corridor, not just a single intersection level, and include other relevant intersections in the analysis.

### **2.2 Puyallup River Crossing**

The location of the East Tacoma Station determines the location of the Puyallup River Crossing. The EIS should evaluate the potential impact of the different crossing locations on both existing and future freight rail infrastructure.

### **2.3 East Tacoma Station**

Criterion L2.6 calls for: Consistency with civic and community planning and land use, evaluating elements such as “local and tribal development goals, current and planned development, current and anticipated zoning, and/or comprehensive plans.” The evaluation of the remaining locations for the East Tacoma Station correctly states: “This station is located in an industrial-zoned area, which is inconsistent with transit-oriented development.” For station locations 1, 2 and 5, it further notes that: “the location ... creates a dependency on the connection along Portland Avenue, which is highly congested and has high truck volumes. The

Port of Tacoma has economic development plans to preserve truck access and mobility along Portland Avenue, which is inconsistent with the siting of a station here.”

The EIS must assess the effect of the remaining station locations on freight mobility in the corridor, and the potential for increased pressure for development that is not compatible with heavy industrial land uses on the north side of Puyallup Avenue. PSRC’s 2015 Industrial Lands Study states: In some subareas (industrial lands), capacity appears adequate, but demand is strong enough to merit management strategies. These include the ... Tacoma-Puyallup subareas.<sup>2</sup> The Level 2 analysis also notes that all remaining alternatives have freight impacts, with Alternatives 1, 2 and 6 performing worse than 3 and 5. The EIS must address both issues and carry out more detailed analysis to more thoroughly determine the effects of the remaining alternatives.

### 3. Elements of the Environment

In the environmental review, we ask that Sound Transit address issues that arise in any of the following categories.

**Transportation:** Analyze and evaluate the effects of station location and design for the Fife and East Tacoma stations on freight and worker transportation access to port properties and facilities. In evaluating the crossing of the Puyallup River, please include potential impacts on freight rail transportation, including rail yards. This study must be a comprehensive traffic analysis, including travel time and other quantitative measures, and access to and from port facilities.

**Land Use:** Analysis and evaluation must include the effects of potential changes to zoning and land use that are incompatible with existing heavy industrial uses in the proximity of the East Tacoma Station. Our goal is to avoid incompatibilities with industrial development that could arise from siting stations in or near industrial land, as they could result in pressure for high density non-industrial uses, or any type of residential use at the boundary of the MIC.

We note that there have been past cases of stations opened at the edge of, or in industrial areas that were initially intended to serve the nearby industrial employment, but once established, they lead to perennial requests for rezoning to residential uses. The SODO Link Light Rail station is one example.

**Economy:** The Port of Tacoma is an economic development authority, and the NWSA provides critical economic support to the region and the state. The project must not interfere with our ability to accomplish our public sector mission. The EIS should evaluate the cost of increased congestion due to construction activities in the public right of way.

**Public Services, Safety and Security:** The Level 2 analysis indicates that the Fife and East Tacoma Stations will increase congestion on two of the three most critical corridors serving the Port of Tacoma MIC. Lack of reliable access and egress routes is already one of the most pressing issues for freight and people in the Tideflats, as well as for emergency service providers. It will be critical to identify the potential effects on an already unreliable system.

**Cumulative Impacts:** Please evaluate all elements of the environment for cumulative impacts from direct and indirect development, over time. The Port of Tacoma and the NWSA make long-term

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<sup>2</sup> Puget Sound Regional Council, Industrial Lands Study, Executive Summary, p. E-10, March 2015.

investments for public purpose and will provide to you our planned capital improvement projects from our long-range planning documents.

## **Conclusion**

The Port and NWSA are pleased with the ongoing collaboration with Sound Transit and other key agencies and stakeholders to consider the regional transit improvement alternatives that uphold the importance of the Port's economic development mission, and its ability to continue producing family wage jobs and improve the quality of life in the region. We will continue to be staunch advocates to support an integrated and robust transportation system that is essential to maintaining Puget Sound's economic competitiveness and sustainability.



## Puget Sound Regional Council

1011 WESTERN AVENUE, SUITE 500 \\\ SEATTLE, WA 98104-1035 \\\ [psrc.org](http://psrc.org) \\\ 206-464-7090

April 30, 2019

Elma Borbe  
Senior Environmental Planner  
Sound Transit  
401 South Jackson Street  
Seattle, WA 98104

**Subject: Tacoma Dome Link Extension Scoping Information Report**

Dear Ms. Borbe,

The Puget Sound Regional Council appreciates the opportunity to comment on the Tacoma Dome Link Extension *Scoping Information Report* document. Implementation of high capacity transit to support growing communities and provide options for regional mobility is fundamental to the success of VISION 2040, the region's integrated long-range strategy for growth management, transportation and economic development. The Regional Transportation Plan, the region's metropolitan transportation plan, includes extension of high capacity transit in this corridor as a vital component of enhancing mobility and providing travel choice in the region. Accordingly, PSRC has an ongoing interest in high capacity transit system planning for the extension of light rail from Federal Way to Tacoma and has been designated as a Participating Agency in this project.

The region's future transportation system will support and help implement VISION 2040, which identifies the long-range Regional Growth Strategy for sustainably accommodating population and employment growth in the central Puget Sound region. A central element of the region's vision is to focus growth in centers and near transit. PSRC is currently updating the region's long-range plan to extend to the year 2050. As part of this plan update, the Regional Growth Strategy is undergoing environmental review. The three alternatives analyzed in the Draft Supplemental EIS continue the guidance set forth in VISION 2040 to focus growth in centers and in transit station areas, and in some instances focus the majority of growth in proximity to high capacity transit. VISION 2050 is anticipated to be adopted in 2020. We encourage Sound



Transit to review both the adopted plan and the emerging VISION 2050 update to ensure continued consistency with regional planning efforts and the Link system expansion.

We commend Sound Transit for their work on the Tacoma Dome Link Extension to date and specifically the scoping effort. In particular, we appreciate being included in the Interagency Working Group discussions associated with this project. The topics included in the Scoping Information Report span the many growth management, transportation, and economic development arenas for which PSRC oversees long-range regional planning. The Scoping Information Report has therefore been reviewed by transportation and growth management department staff.

#### Comments on Scoping Information Report

##### Draft Purpose and Need

The Draft Purpose and Need Statement references VISION 2040 in two places, but only references the 2018 Regional Transportation Plan (RTP) in one. The Tacoma Dome Link Extension project is specifically called out in the 2018 Regional Transportation Plan in the regional capacity project list (project #5685). The RTP should be mentioned in conjunction with VISION 2040 given the role of the RTP in identifying specific long-range transportation investments in the central Puget Sound region.

##### Including Displacement Risk in the EIS

We commend Sound Transit for including displacement risk and potential impacts to different populations and communities as part of the alternatives analysis for the Tacoma Dome Link Extension. Many transit communities are home to existing low- and moderate-income households at potential risk of displacement due to increased market strength and gentrification that may accompany transit system development. We encourage Sound Transit to continue to analyze displacement risk and include mitigation measures in the EIS to ensure all people can continue to live in and have access to thriving transit communities. Additionally, PSRC recently developed a regional displacement risk analysis that may provide additional information and data for future study in the EIS.

##### Including TOD Potential in the EIS

We greatly appreciate Sound Transit's inclusion of TOD potential as part of the alternatives analysis. However, we noted that TOD potential is not specifically called out in the list of "Topics to Be Addressed in the EIS." We recommend explicitly calling out TOD as a topic for further review to ensure this important aspect of high capacity transit planning continues to be featured in planning work.

Promotion of TOD, characterized by compact, walkable, mixed-use development, is key to implementing the objectives of VISION 2040, the 2018 Regional Transportation Plan, and the Growing Transit Communities Strategy that point the way toward a more sustainable, healthy, and equitable region. Not only does TOD pay significant dividends over the long term in expanded ridership, but incorporating TOD in the environmental review is an important step toward Sound Transit aligning its high capacity transit investments with current and future land use and creating a transit system that supports community building. We encourage Sound Transit to continue to include robust TOD analysis as a component of the TDLE EIS, such as parcel level analysis and market readiness studies, similar to the work completed as part of the Federal Way Link Extension.

Finally, a note on TOD potential and travel time: PSRC recognizes the importance of comparing alignment and station alternatives in terms of the resulting light rail travel time. However, there is another dimension of travel time—door-to-door travel time for transit patrons—that would enrich the discussion on TOD potential in the EIS. Residents and workers traveling to and from locations within walking distance of light rail stations in the corridor are likely to experience shorter door-to-door travel times than are travelers to and from more distant locations that require travel by automobile and particularly feeder bus transit. This is a benefit of TOD that should be made clearer and incorporated into the TOD analysis in the EIS.

The Tacoma Dome Link Extension is an important long-range investment for our region and we appreciate the opportunity to comment and participate. If you have any questions regarding our comments, please contact me at (206) 464-6360 or [EHarris@psrc.org](mailto:EHarris@psrc.org).

Sincerely,



Erika Harris  
SEPA Responsible Official  
Puget Sound Regional Council

CC: Gil Cerise, Principal Planner  
Laura Benjamin, Senior Planner



**General Manager's Office**  
201 S. Jackson Street  
KSC-TR-0415  
Seattle, WA 98104-3856

April 26, 2019

Elma Borbe  
Senior Environmental Planner  
Central Puget Sound Regional Transit Authority (Sound Transit)  
401 S. Jackson Street  
Seattle, WA 98104-2826

Dear Ms. Borbe:

King County Metro Transit Department (Metro) is pleased to accept Sound Transit's invitation to become a Participating Agency in the environmental review process for the Tacoma Dome Link Extension (TDLE) project (Cooperating Agency Designation, Enclosure 1). This letter responds to Sound Transit's Request for Comments on Scope of the Environmental Impact Statement (EIS) for the TDLE project and identifies staff responsibilities for the EIS process.

Metro's top three issues and needs concerning the project include:

1. Maintaining reliable and efficient service will be essential to providing mobility throughout this area of the county, especially to priority populations.
2. Station locations in the vicinity of I-5 and the associated alternative alignments will likely result in Metro having greater difficulties in trying to maintain reliable and efficient service and optimize rail/bus transfers than station locations further to the west.
3. Metro's preferred South Federal Way station location is in the vicinity of the Metro-owned South Federal Way Park & Ride. The SF 4 alternative is located in proximity to this park and ride, which is a currently under-utilized facility and provides opportunities for adequate project parking capacity (over 500 parking spaces) and/or transit oriented development. Further, this site offers the best conditions for reliable connections to transit for our shared customers and greater opportunity for mixed-use development and transit partnerships.

## **Sound Transit/King County Metro Coordination**

As you know, Sound Transit and Metro have coordinated formally and informally on the development of at least 13 ongoing Sound Transit capital projects over the last several years. In May 2018, Sound Transit and Metro executed the *System Expansion Transit Integration Agreement* (Agreement), which commits the two agencies to delivering investments that achieve the vision of an integrated regional transit network that provides an easy and seamless customer experience. As part of this collaboration, the *Framework for Transit Integration in Capital Project Development* (Framework) was developed to formalize a capital project development process in order to ensure an integrated regional transit network. A direct benefit from this collaboration for TDLE was the inclusion of Metro's 2040 network in the development of the alternatives alignments and transportation analysis.

The Agreement and Framework outline Metro's expected contribution to the EIS process, including scoping and development of alternatives. For reference, Metro's contributions to early scoping and the proposed methodology of the transportation analysis are summarized below and feed into our comments on the current EIS scope and alternatives.

### **Comments on Early Scoping, May 2018**

Metro responded to Sound Transit's early scoping efforts and the purpose and need for TDLE (Bill Bryant to Steve Kennedy, May 7, 2018, Enclosure 2). Key issues raised include:

- In the joint 2014 Transit Integration Report, "Getting there together," Sound Transit and Metro envisioned urban transit facilities that feature reduced travel time, a seamless system, and better customer experience.
- Station locations in the vicinity of I-5 and big box retail limits effective bus/rail integration, discourages non-motorized access, and hinders future development. The South Federal Way station location should maximize opportunities for multimodal access including efficient bus/rail transfers, transit oriented development and good urban design.
- Sound Transit should consider the Metro owned South Federal Way Park & Ride when developing station concepts. This underutilized park and ride, which currently provides 515 parking spaces, could be used for LRT parking and/or as a transit oriented development site.

### **Level 1 and Level 2 Evaluation Criteria, August 2018 to February 2019**

In August and again in February, Metro's transportation planning team reviewed and commented on the evaluation criteria for the alternative station location analysis in the evaluation review period. Metro participated in the Interagency Group and provided written feedback during this evaluation phase. To adequately assess the potential impacts on Metro

operations and facilities, comments focused on station locations and service impacts, potential for transit oriented development, and multimodal access and integration.

During this evaluation period, Metro consistently noted that of the nine station location alternatives identified, the stations further west are more preferable for integrating with the anticipated service routes in Metro Connects. SF 4 station locations are the most preferable for Metro's ability to provide service and as a potential for transit oriented development.

Metro identified potential impacts from Alternatives SF 2, SF 3, SF 8 and SF 9 on Metro service and the local transportation network in the South Federal Way area that call for a more thorough analysis in the EIS. Our observations of expected impacts are as follows:

- The proposed project will make permanent changes to the transportation system that would affect the speed and reliability of bus services requiring robust analysis of impacts and adequate mitigation commitments.
- Direct access from SR-99 is critical to fast and reliable bus service to the South Federal Way Station. Having bus access on 16th Ave S would significantly slow buses down. Bus access to the transit center on S 352nd St would introduce an additional left turn, which would be an extremely inefficient use of bus service hours. Access to the transit center directly from SR-99 would result in the highest quality transfer experience. Access on S 348th St would introduce some delay but would be acceptable.
- The Level 2 Evaluation identifies SF 8 and SF 9 as lower ridership potential than SF 4 (highest potential) and SF 2 and SF 3 as moderate ridership potential.

The following recommendation for the scope of the EIS responds to the issues raised above and should be included in the environmental analysis for the TDLE EIS:

- Consider station locations furthest west (preferably SF 4 locations) for improved Metro access that provide for efficient connections and seamless transfers for transit customers.

## **Alternatives**

In review of the preferred alternative station locations, Metro planning staff considered the EIS Scoping Information Report, which identifies the Draft Purpose and Need statement and contains several objective statements including:

- Encourage equitable and sustainable urban growth in station areas through support of transit oriented development and multimodal integration in a manner that is consistent

with local land use plans and policies, including Sound Transit's Transit Oriented Development and Sustainability policies.

- Encourage convenient and safe non-motorized access to stations such as bicycle and pedestrian connections consistent with Sound Transit's System Access Policy. As elaborated by King County Department of Natural Resources and Parks, establishing these strategic connections are critical in providing equitable access to region-wide mass transit and maximizing overall ridership at each station. Engage project stakeholders early to begin the process of programming the non-motorized access funds included in this project to ensure that any identified access improvement projects are completed by the TDLE revenue service date.

The station locations identified as alternatives with "more potential" (SF2 West Enchanted/352<sup>nd</sup>, SF 8 I-5/356<sup>th</sup> and SF 9 I-5/Jet) are the least supportive of these objectives.

Based on the station locations presented as alternatives with more potential, Metro would prefer SF 2 West (West Enchanted/352<sup>nd</sup>). However, Metro would most prefer any of the SF 4 alternatives over the three alternatives identified in the Level 2 evaluation. The alternatives SF 8 and SF 9 would have the greatest impact to efficient Metro service, offer the least potential for transit oriented development, and rank the lowest in terms of multimodal connections. The SF 4 options, because of the proposed location of the SF 4 station, are much better able to meet regional mobility needs and have the greatest potential for ridership expansion at the South Federal Way station.

### **Metro Staff Responsibilities**

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

Lori Burchett, AICP  
Transportation Planner III  
King County Metro Transit  
King Street Center  
201 S. Jackson St, KSC-TR-0413  
Seattle, WA 98104-3856  
206-263-3086  
[lori.burchett@kingcounty.gov](mailto:lori.burchett@kingcounty.gov)

John Greene, PMP  
Senior Transit Environmental Planner  
King County Metro Transit  
King Street Center  
201 S. Jackson St, KSC-TR-0435  
Seattle, WA 98104-3856  
206-263-0506  
[jgreene@kingcounty.gov](mailto:jgreene@kingcounty.gov)

Thank you for this opportunity to comment on the alternatives and scope of the EIS. The TDLE has the potential to provide a significant benefit to the regional network and Metro



will continue to work with Sound Transit in our role as a Participating Agency. We believe that implementing the recommendations above will disclose important information needed to develop a balanced Preferred Alternative and to assist the public and decision-makers in selecting the best option.

We look forward to continuing our collaboration to achieve the best project for our shared customers across the region.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rob Gannon', is written over the typed name.

Rob Gannon  
General Manager  
King County Metro Transit Department

Enclosure 1. Tacoma Dome Link Extension Project Cooperating Agency Designation

Enclosure 2. Metro Early Scoping Response Letter, May 7, 2018



## King County

Department of Transportation  
Metro Transit Division  
Service Development  
201 South Jackson Street  
KSC-TR-0426  
Seattle, WA 98104-3856

May 7, 2018

Tacoma Dome Link Extension  
(c/o Steve Kennedy, Senior Environmental Planner)  
Sound Transit  
401 S Jackson Street  
Seattle, WA 98104-2826

Dear Mr. Kennedy:

Thank you for the opportunity to submit comments on the Tacoma Dome Link Extension's purpose and need. In our joint 2014 Transit Integration Report, "Getting there together," King County Metro and Sound Transit envisioned urban transit facilities that would feature reduced travel time, a seamless system, and better customer experience. In order to reach these goals, Sound Transit should consider the following features for the South Federal Way Station.

**Multimodal Station Access** – The representative station location is shown adjacent to I-5 and big-box retail. This location limits effective bus/rail integration, discourages non-motorized access, and hinders future development. While considering cost and engineering challenges, the ultimate station location chosen for South Federal Way should maximize opportunities for multimodal access including efficient bus/rail transfers (Metro and Pierce Transit), transit oriented development, and good urban design.

**South Federal Way Park & Ride** – Sound Transit should consider this Metro owned asset when developing station concepts for the Level 1 conceptual evaluation. This underutilized park & ride could be used in the future for LRT parking or as a transit oriented development site.

King County Metro excited to collaborate with Sound Transit to significantly expand transit access to passengers throughout the Puget Sound Region. Please contact Steve Crosley at 206-477-5794, [scrosley@kingcounty.gov](mailto:scrosley@kingcounty.gov) for questions of further discussion related to the Tacoma Dome Link Extension project.

Sincerely,

Bill Bryant  
Managing Director  
Service Development



April 26, 2019

Elma Borbe  
Sound Transit  
401 S Jackson Street  
Seattle, WA 98104

Subject: Tacoma Dome Link Extension Scoping

Dear Ms. Borbe:

Pierce Transit received your March 29, 2019 letter inviting Pierce Transit to participate in the Sound Transit (ST) Tacoma Dome Link Extension (TDLE) Project Environmental Review Process and to provide comment by May 1, 2019. We appreciate you reaching out to Pierce Transit for this opportunity to comment. Pierce Transit has a long-standing relationship with Sound Transit and looks forward to continued coordination between agencies as we move forward with the extension of light rail into Pierce County.

Pierce Transit has participated in the TDLE Inter-Agency Group (IAG) meetings and other related project activities to date and has also reviewed various project documents and other materials. Based on our current knowledge about this project, Pierce Transit offers the following comments for your and ST's consideration.

Pierce Transit requests that sufficient layover space is incorporated into the final design of each station regardless of the site selected. Sufficient layover space is vital in the support of Pierce Transit and other transit agencies' buses for safe and efficient operations. Additionally, PT strongly suggests that ST consider the propensity for Transit Oriented Development (TOD) as one of the primary factors when deciding on the final location for each station. TOD leads to the reduction of vehicle dependency and associated congestion and the development of more localized communities centered around stations.

In addition to these comments that are relevant to all stations, below are PT's station-specific comments.

Tacoma Dome Station Location:

From the perspective of optimal transit integration using existing facilities, our rank of Tacoma Dome station location alternatives is (from highest to lowest):



1. TD 2: 25<sup>th</sup> Street West
2. TD 3: 25<sup>th</sup> Street East (provided there was an infill or relocation of streetcar platform to facilitate transfers)
3. TD 1: Puyallup Avenue
4. TD 4 West: E 26<sup>th</sup> Street to E 27<sup>th</sup> Street, TD 4 East: E 26<sup>th</sup> Street
  - Serving both TD 4 locations would require substantial mid-route deviations on four (4) Pierce Transit routes, and possibly create a need for a new layover facility for routes terminating there.

#### East Tacoma Station Locations:

As current ST plans do not include adding a parking structure to the East Tacoma Station location area, Pierce Transit would like ST to put significant effort into designing safe and efficient non-SOV accessibility to the station area. Station access via Pierce Transit buses, pedestrians, bicyclists, and other non-motorized users needs to be carefully planned and designed to maximize ridership opportunities.

From the perspective of optimal transit integration by **minimizing** fixed route deviation and maximizing non-motorized access, our rank of East Tacoma station location alternatives is (from highest to lowest):

1. ET 3A: E 26<sup>th</sup> Street to E 25<sup>th</sup> Street, ET 3B: 26<sup>th</sup> Street East
2. ET 5: E 27<sup>th</sup> Street
3. ET 2: E 25<sup>th</sup> Street
4. ET 1: Puyallup Avenue, ET 6: 26<sup>th</sup> Street West

#### Fife Station Locations:

From the perspective of optimal transit integration by **minimizing** fixed route deviation and maximizing non-motorized access, our rank of Fife station location alternatives is (from highest to lowest):

1. Fife 4A: South of 15<sup>th</sup> Street E, Fife 4B: South of 15<sup>th</sup> Street E
2. Fife 3A: North of 15<sup>th</sup> Street E, Fife 3B: North of 15<sup>th</sup> Street E
3. Fife 1: 12<sup>th</sup> Street E

#### South Federal Way Station Locations:

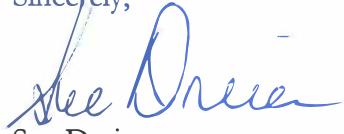
From the perspective of optimal transit integration by **minimizing** fixed route deviation and maximizing non-motorized access, our rank of South Federal Way station location alternatives is (from highest to lowest):

1. SF 4: 99 North
2. SF 2 East/West: Enchanted/S 353<sup>rd</sup> Street, SF 3: Enchanted/S 356<sup>th</sup> Street
3. SF 8: I-5/S 356<sup>th</sup> Street, SF 9: I-5/Jet Chevrolet



Pierce Transit appreciates the opportunity to comment on the TDLE project and look forward to working together with Sound Transit as a participating agency in the environmental review process.

Sincerely,



Sue Dreier  
Chief Executive Officer

cc: Ryan Wheaton, Executive Director Planning and Community Development  
Tina Lee, Planning Manager  
Max Henkle, Senior Planner  
Jason Kennedy, Planner Analyst  
Alexander Mather, Government and Community Relations Officer



April 30, 2019

Mr. Curvie Hawkins  
Ms. Elma Borbe  
Sound Transit  
401 S Jackson Street  
Seattle, WA 98104

***Re: Tacoma Dome Link Extension Project EIS Scoping Comments***

Dear Mr. Hawkins and Ms. Borbe:

Thank you for the opportunity to comment on the scoping effort for the Tacoma Dome Link Extension (TDLE) Project. The Mayor and City Council have not provided formal comment at this time. The comments below are of a technical nature and are intended to reflect the opportunities and constraints of the alternative alignments and station locations.

**General Comments**

1. Streets in the vicinity of any of the station alternative locations tend to be heavily impacted by traffic congestion created by daily commuters, retail shoppers, diversion from Interstate 5 congestion and destinations like Wild Waves. Mitigation may be necessary to address the impacts of a new station and any location. Specific areas of concern include:
  - S 348<sup>th</sup> St between 1<sup>st</sup> Ave S and Interstate 5
  - S 352<sup>nd</sup> St between Pacific Highway S and the proposed 18<sup>th</sup> Ave S
  - S 356<sup>th</sup> St between 1<sup>st</sup> Ave S and SR 161
  - Pacific Highway S between S 336<sup>th</sup> St and S 356<sup>th</sup> St
  - SR 161 between SR 18 and Milton Road S
2. New roadway connections may be necessary to help divert traffic from congested arterials and improve non-motorized access to the station, such as 18<sup>th</sup> Ave S between S 352<sup>nd</sup> St and S 356<sup>th</sup> St, and connection 9<sup>th</sup> Ave S to S 352<sup>nd</sup> St between Pacific Highway S and S 348<sup>th</sup> St. Widening of the existing corridor could be required, such as S 356<sup>th</sup> St between 1<sup>st</sup> Ave S and Pacific Highway S, or SR 161 between S 352<sup>nd</sup> St and Milton Rd S.
3. Similarly, pedestrian and bicycle access may be limited by incomplete networks to serve the station locations. Particular gaps include S 356<sup>th</sup> St between 1<sup>st</sup> Ave S and Pacific Highway S and a planned multi-use path connecting 9<sup>th</sup> Ave S and S 352<sup>nd</sup> St between S 348<sup>th</sup> St and Pacific Highway S. This would also improve non-motorized access between the proposed station and the existing South Federal Way Park and Ride Lot.



4. All of the proposed station locations could involve access points to the street system that would be difficult to accommodate full access to bus transit due to access management standards and queuing at intersections. The access could involve routing busses on S 352<sup>nd</sup> St or other roadways, the pavement for which was not designed to accommodate transit vehicles. As such, the structural impacts of bus routing to serve the station on existing pavement structures should be evaluated.
5. Existing and planned bus transit service to the station locations is relatively minimal. However, the proximity of the station to SR 18 and SR 161 is likely to attract trips from southeast King County and northeast Pierce County as well as northeast Tacoma, areas which have minimal to no bus transit service. The resulting mode split for trips to and from the station is likely to be heavily oriented towards single occupant vehicles and increase parking demand. Currently, there are no City streets with on-street parking within a quarter of a mile in any of the station sites that could absorb overflow for parking and surrounding retail parking lots may be illegally used instead. Mode split assumptions and parking demand needs to be carefully evaluated to consider this issue.
6. WSDOT plans to construct the next phase of the I-5 / SR 18 / SR 161 Triangle project in the 2025-27 biennium. This includes the addition of a southbound off-ramp from I-5 to SR 161 and S 356<sup>th</sup> Street. The project would also replace the traffic signals at the SR 161 / 16<sup>th</sup> Avenue S / S 356<sup>th</sup> Street intersection with a two-lane roundabout. The additional traffic generated by the station may necessitate increasing the size of the roundabout to three lanes. Close coordination with WSDOT and the City will be necessary to avoid reconstructing newly-constructed facilities.
7. Any of the station alignments need to continue close coordination with the City regarding the City Center Access project and S 324<sup>th</sup> St extension. Sound Transit has been a partner to-date in the planning effort and the selected TDLE alignment and South Federal Way Station must not preclude the City Center Access or S 324<sup>th</sup> St Extension projects.
8. As part of the Federal Way Link Extension project, substantial input was gathered resulting in the Interstate 5 alignment for that project. Within City limits, the City wants to ensure that previous, current and planned City capital and outside agency capital projects are not adversely impacted by the proposed TDLE track alignment and station.
9. The owners of the Belmor Mobile Home Park have had multiple discussions with the City regarding significant redevelopment at the Mobile Home Park and submitted a comprehensive plan amendment for consideration in 2019. The TLDE Project team will need to coordinate closely with the proposed development.
10. The Federal Way Police Department expects an increase in emergency calls, traffic collisions and traffic related delays to respond to incidents. The impact to police operations will be a major consideration in the EIS process and a joint security substation between Federal Way Police and Sound Transit Security may be warranted in the vicinity of the South Federal Way Station.
11. The EIS scope needs to include a financial analysis of the business and property tax revenue impacts associated with property acquisitions for each alternative. Property impacts and resulting reduction of local tax revenue are important to the City Council and Mayor as they impact the City's general fund and level of service delivery to citizens.

Interstate 5 to Enchanted Parkway Alignment: Station SF 2 West

1. Station SF 2 West has less impact to existing businesses and infrastructure improvements of the than station SF 2 East and has one less larger roadway barrier for patrons west of Enchanted Parkway to access the station.
2. The proposed SF 2 station location on the north side of the recently completed S 352<sup>nd</sup> St improvements has many benefits including multi-modal station access, reduced congestion approaching the station compared to access off Pacific Highway S, S 348<sup>th</sup> St or Enchanted Parkway South, and high transit oriented development potential.
3. The EIS scope needs to include evaluation of soil contamination and potential remediation measures from industrial activity at this location and adjacent sites.
4. Enchanted Parkway is a Principal Arterial within the City and approved Link Light Rail construction related street closures will be limited.
5. The EIS scope will need to evaluate wetland and stream impacts to the East Fork of Hylebos Creek, part of the City's primary salmon watershed. Any mitigation required must be completed within City limits in the Hylebos Watershed.

Interstate 5 to Enchanted Parkway Alignment: Station SF 2 East

1. Business and property impacts at SF 2 East are greater than SF 2 West.
2. Note that Costco has permit applications in with the City for fueling station upgrades.
3. Non-motorized patron access from west of the SF 2 East location requires crossing both Pacific Highway S and Enchanted Parkway South, likely reducing the distance of the station walkshed. The EIS scope will need to evaluate wetland and stream impacts to the East Fork of Hylebos Creek, part of the City's primary salmon watershed. Any mitigation required must be completed within City limits in the Hylebos Watershed.

Interstate 5 to Enchanted Parkway Alignment: Station SF 3

1. Station SF 3 is essentially a west facing station alternative iteration of Station SF 8 or SF 9, however the track guideway alignment to access Station SF 3 has more impact to businesses and is likely more expensive.

Pacific Highway S Alignments: Station SF 4 (Options A, B, C, and D)

1. The Pacific Highway S alignment shown north of Station SF 4 remains unpopular with City staff and elected officials. The City spent several million dollars over the better part of ten years improving Pacific Highway S with HOV lanes, landscaped medians, signal and driveway improvements. Further right-of-way acquisition required by the TDLE project in this alignment could turn many of the remaining business frontages into remnant parcels that cannot be developed.
2. The Pacific Highway S alignment shown south of Station SF 4 on the west side of Pacific Highway S has substantial critical areas impact to several parcels, including parcels owned by the City and acquired with King County Conservation Futures Funding. The EIS scope will need to evaluate wetland and stream impacts to the West Fork of Hylebos Creek, part of the City's primary salmon watershed. Any mitigation required must be completed within City limits in the Hylebos Watershed.

3. Station SF 4 is within a six-month, one-year and five-year critical aquifer recharge area and the EIS scope needs to include wellhead monitoring and mitigation. The alignment is also within the six-month and one-year wellhead capture zone and foreseeable environmental impacts must be evaluated in the EIS scope.
4. Station SF 4 is closer to residential, office and medical land uses west of Pacific Highway S and served better by existing bus services. However, it is bisected by S 348<sup>th</sup> St and the intersection of Pacific Highway S and S 348<sup>th</sup> St will be congested and difficult to serve by bus.

Interstate 5 Alignment – Stations 8 and 9

1. The EIS scope for a station at SF 8 or SF 9 must evaluate the need for a pedestrian bridge over Interstate 5.
2. The transit oriented development potential of a station at SF 8 or SF 9 is lower than that of SF 2 West or SF 4.
3. The next phase of the I-5 / SR 18 / SR 161 Triangle project that includes the addition of a southbound off-ramp from I-5 to SR 161 and S 356<sup>th</sup> Street and replaces the traffic signals at the SR 161 / 16<sup>th</sup> Avenue S / S 356<sup>th</sup> Street intersection with a two-lane roundabout. Station alternative SF 8 and SF 9 straddle this WSDOT project.

Sincerely,



EJ Walsh, P.E.  
Public Works Director



Brian Davis  
Community Development Director

cc: Jim Ferrell, Mayor  
City Council  
Tony Doucette, City Staff Liaison  
Dayfile



April 23, 2019  
Sound Transit Board  
C/o Board Administrator  
401 South Jackson St.  
Seattle, WA 98104-2826

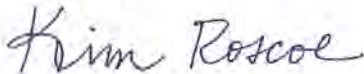
Honorable Sound Transit Board members,

Thank you for this opportunity to provide “scoping comments” on the Tacoma Dome Link Extension project that will complete the light rail spine through the City of Fife and extend to the Tacoma Dome. The City of Fife remains fully committed to working together with the Transit Board to provide our full support and assistance in the design alternatives process and construction phases that follow. We offer the following “scoping comments” for your consideration to further strengthen and enhance partnership opportunities as we continue to move forward with site design alternatives and construction. **The Fife City Council:**

1. **Strongly favors the Fife 3b as the preferred alternative** and Fife 3a as an alternative. Fife 1 could be an alternative only if one is required. The city has significant concerns with Fife 4 due to increased congestion impacts along Pacific Highway which includes freight disruption.
2. **Strongly favors the Pacific Hwy as the preferred alignment** (between the Fife Station extending west to Port of Tacoma Road) and I-5 as the study alternative. The Pacific Highway alignment will provide an opportunity for adding a station in the distant future, east/west bike/pedestrian enhancement connecting to other trails and increased redevelopment opportunity to include housing and expanded ridership.
3. **Strongly encourages that a separate detailed financial analysis of property impacts be conducted for the area extending between 54<sup>th</sup> Ave E (on the East) and Port of Tacoma Road (on the West).** This will provide a more accurate baseline comparison concerning the alignment through Fife.
4. **Directed the Fife Community Development Director and Public Works Director to submit a separate and more detailed scoping letter** on behalf of the City of Fife that is consistent with these Council scoping comments.

Thank you again for the opportunity to provide our scoping comments on the work that has been completed. The City of Fife remains committed to making TDLE a success for all of our citizens, businesses and transit riders.

Sincerely,

A handwritten signature in black ink that reads "Kim Roscoe". The signature is written in a cursive, flowing style.

**Kim Roscoe**  
**Mayor**

cc: Bill Sterud, Chairman Puyallup Tribal Council, 3009 E. Portland Ave., Tacoma, WA 98404  
Bruce Dammeier, Pierce County Executive, 930 Tacoma Ave. S. Room 737, Tacoma, WA 98402  
Victoria Woodards, Mayor of Tacoma, 747 Market St., 12<sup>th</sup> Floor, Tacoma, WA 98402  
Jon Wolfe, Chief Executive Officer, Northwest Seaport Alliance  
Andrew Strobel, Director of Planning and Land Use, Puyallup Tribe of Indians  
Dean Moberg, Federal Hwy. Admin, Washington Division  
Roger Millar, Acting Director WSDOT, POB 47370, Olympia, WA 98504-7370  
Elma Borbe Sound Transit Senior Environmental Planner





April 30, 2019  
Sound Transit Board  
C/o Board Administrator.  
401 South Jackson St.  
Seattle, WA 98104-2826

Honorable Sound Transit Board members,

Thank you for this opportunity to provide “scoping comments” on the Tacoma Dome Link Extension project. The intent of this “Scoping Comment letter” is to add detailed comments in addition and support of the Fife City Council scoping comment letter dated April 23, 2019.

- 1. Fife strongly favors the Fife 3b as the preferred alternative.** Station Fife 3 is the most consistent with adopted Comprehensive Plan policies for the city center and planned transportation infrastructure. As Sound Transit refines the design and evaluates the impacts:
  - A.** The station must be shifted westerly to span the new north/south street;
  - B.** Rail should maintain an east-west alignment east of 54<sup>th</sup> Ave E to preserve the city center gridded street pattern;
  - C.** Rail should start to curve south west of the existing commercial area on the west side of 54<sup>th</sup> – the Poodle Dog Plaza – in order that that area can support the city center’
  - D.** Parking structure must be operational at the time of station opening since it is the only new parking available for the southerly three new stations.
  - E.** Include a parking demand analysis to ensure the garage is properly sized for the long term. The study should be well integrated with the traffic impact analysis and address how operational pricing and enforcement impact projected residential and commercial uses.
  - F.** Analyze improving alternative modes of travel (pedestrian, bicycle, bus transit, drop-off) and identify Bike/pedestrian connection to riders south of I-5;
  - G.** Must follow best practices for low-impact development
  - H.** Fife 1 should be eliminated from further review unless needed as an alternative. It is less consistent with the Comprehensive Plan for City Center and transportation infrastructure plans.
  - I.** Fife 4 should be eliminated from further review since it is the least consistent with the Comprehensive Plan; significantly impacts existing affordable housing to the east; and, increases existing congestion impacts along Pacific Highway which further worsens freight disruption.



**Rail extension from Fife/Milton City limits to Station location**

- J. Direct a qualified professional archaeologist, approved by the Puyallup Tribe of Indians, to prepare a cultural resource assessment in consultation with the Puyallup Tribe of Indians, for all off-site construction lay-down areas and on-site improvement areas
- K. Provide "Critical Areas" analysis for streams, wetlands, aquifer recharge, frequently flooded area, seismic hazard areas fish and wildlife habitat pursuant to Title 17 of the Fife Municipal Code.
- L. Consider the impact and timing of the ST-3 rail location and improvements in relation to the Hylebos Creek and WSDOT's SR-167 "Riparian Restoration Program."
- M. The transportation study above should also identify any short term construction impact
- N. Identify locations for stormwater treatment
- O. Identify construction staging sites
- P. Identify street improvements necessary for station access;
- Q. Avoid impacts to the constructability of planned frontage road, parallel to and southwest of the new Gateway freeway, between SR 99 and 8<sup>th</sup> Street E.
- R. Prepare a view shed analysis to identify any impacts on residences north of Pac Hwy at the curve and the weave through SR-167.

**2. Fife strongly favors the Pacific Hwy as the preferred rail alignment** between the Fife-3 station extending west to Port of Tacoma Road. The Pacific Highway alignment:

- A. Preserves the opportunity for adding a station in the distant future (ST-5?)
- B. Allows an east/west bike/pedestrian facility connecting to other regional trails;
- C. Increases redevelopment opportunity to include housing and expanded ridership post rail construction;
- D. Should transition over to I-5 at the Port of Tacoma Interchange (POTI) area to further lessen commercial property impacts between POTR and the Puyallup River;
- E. Should cantilever partially over the Pac Hwy ROW to the maximum extent possible to further lessen "property takes" during construction and long term operations;
- F. The I-5 alignment alternative is not preferable for the following reasons:
  - i. Whether elevated or at grade, it further exacerbates appearance of "walling off" the north half of Fife. "Walling-off" is a significant equity/justice issue for Fife;
    - + At grade rail has negative visual impacts with security fencing and possibly sound attenuation features
    - + Elevated rail, intermittent concreted structures and combined with security fencing and sound attenuation features impact property views;
  - ii. Impairs potential future I-5 widening when needed, which is already at capacity in PM peak (such as additional lanes);
  - iii. Increased conflicts with Fife planned I-5 improvements for replacement on/off ramps west of 54<sup>th</sup> Ave E;
  - iv. Increased conflicts with planned Frank Albert bridge span over I-5;

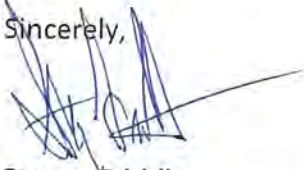
- v. Fife owns property along the I-5 corridor zoned Public Use/Open Space slated for park development;
- vi. Significant impact on "view properties" from abutting existing commercial and medical facilities;
- vii. View and emission impacts to existing Chateau Rainier affordable housing complex owned by Pierce County;
- viii. Larger property tax and sales tax revenues reduction impact on City of Fife;
- ix. Larger "property takes" for construction and operations (since a portion of PacHwy alignment can be designed to overhang onto Pac Highway ROW.
- x. The I-5 alignment will need to be at a "third level" to cross over the highway bridges which cross over I-5, while the SR 99 alignment could be roughly the same elevation as the highway bridges. The extra height would substantially increase the visual impact.

**3. Conduct separate detailed property impact analysis on properties and business for the area extending between 54<sup>th</sup> Ave E (on the East) and Port of Tacoma Road (on the West).** Impacts to Fife's business are of significant concern and importance to Fife. Detailed analysis is necessary to identify specific property impacts to each property owners/business in this segment. The current/preliminary property impact analysis examines the entire 4-mile Fife segment (out of the total 9.7-miles) extending from the King/Pierce County Line to the middle of the Puyallup River and the 3B is characterized as totaling \$100M more than 3A. We feel that this distorts the true comparison/decision when comparing the two alignments. To assist decision makers, this 4-mile segment should be divided into smaller segments. Specifically, we request a more detailed baseline comparison concerning the two alignments (3A and 3B) for the area between 54<sup>th</sup> Ave E to Port of Tacoma Rd only:

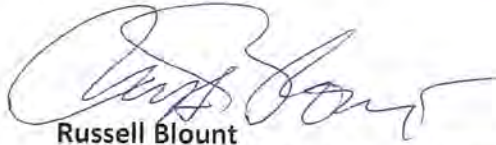
- A. An apples-to-apples analysis should include the current matrix indicators and be expanded to include # of businesses (owners & tenants) impacted during construction and long term operations; value of land removed from property tax rolls, projection of sales tax loss, and identify the area returned for redevelopment post construction;
- B. The PacHwy alignment impact should be narrowed to reflect a smaller construction and operations foot-print resulting from of extending over a portion of the existing ROW and the Fife-A alignment should consider future I-5 compatibility;
- C. Identify emission impacts on residential and commercial uses (noise, light, glare, security lighting, concussive or vibration, during construction and long term operations and maintenance;
- D. Clarify whether the electric power causes any disruption interference;
- E. Provide photographic view analysis of structures and security features on each of the impacted I-5 frontage properties (3A) to include view of the property looking north from I-5 and from the properties looking south toward Mt. Rainier. (ex.: Salish Cancer Center/PC Housing/other commercial properties).
- F. Provide photographic view analysis north from I-5 of 3B structures.

Thank you again for the opportunity to provide our scoping comments on the work that has been completed. The City of Fife remains fully committed to working together with Sound Transit to provide our full support and assistance in the DEIS/FEIS process and construction phases that follow. The City of Fife remains committed to making TDLE a success for all of our citizens, businesses and transit riders.

Sincerely,



**Steven Friddle**  
Director of Community Development



**Russell Blount**  
Deputy City Manager/ Public Works Director

cc: Bill Sterud, Chairman Puyallup Tribal Council, 3009 E. Portland Ave., Tacoma, WA 98404  
Bruce Dammeier, Pierce County Executive, 930 Tacoma Ave. S. Room 737, Tacoma, WA 98402  
Victoria Woodards, Mayor of Tacoma, 747 Market St., 12<sup>th</sup> Floor, Tacoma, WA 98402  
Jon Wolfe, Chief Executive Officer, Northwest Seaport Alliance  
Andrew Strobel, Director of Planning and Land Use, Puyallup Tribe of Indians  
Dean Moberg, Federal Hwy. Admin, Washington Division  
Roger Millar, Acting Director WSDOT, POB 47370, Olympia, WA 98504-7370  
Elma Borbe Sound Transit Senior Environmental Planner





City of Tacoma  
City Manager

May 1, 2019

Elma Borbe  
Sound Transit  
401 South Jackson Street  
Seattle, WA 98104

RE: Tacoma Dome Link Extension – Scoping Comments

Dear Ms. Borbe:

Development of the Tacoma Dome Link Extension (TDLE) is a landmark investment for Tacoma and for the Puget Sound region. Communities in the South Sound have been waiting for completion of the LINK “Central Spine” since before ST2. This project will finally connect that spine to the second largest city in the Puget Sound and with the comprehensive web of transportation options that weave the South Sound together and with destinations far beyond.

In recognition of the importance and the City of Tacoma’s role in the successful delivery of the project, we offer the following comments for your consideration during the project’s Environmental Impact Statement (EIS) process.

The City Council is expected to take legislative action in late May or early June 2019 to forward its comments and recommendations to the Elected Leadership Group and the Sound Transit Board. In anticipation and support of the policy-level action of the City Council, which will include specific recommendations on station options that should move forward, our comments are mainly focused on technical issues that should be studied in the EIS process, representing the concerns and suggestions of City staff, as well as community, commission and Council input. In addition, we are also highlighting some of the City’s core values we believe are essential to shaping the TDLE project in a manner that will maximize its potential for connecting our region. Comments are numbered for easy reference and not listed in any particular order of importance.

#### **A. Core Values**

- 1. Destination City** – Tacoma is the second largest city in the Puget Sound Region. It is recognized as a Metropolitan City in the Puget Sound Regional Council’s Vision 2040 regional growth strategy, which is the top-tier of its regional designations and an area responsible for absorbing a major share of the population and employment growth of the region. The Dome District is within the City’s Downtown Regional Growth Center, which is designated both locally and regionally as a focus for growth and a major destination within the region. For example, the Tacoma Dome is the largest indoor venue in the state of Washington. In 2017, eight of the top 25 North American tours and five of the top 25 worldwide tours played the Dome. The draw of the Tacoma Dome is just one example, but it alone demonstrates Tacoma’s unique status along the TDLE corridor. As a destination for the region, the state and, in fact, world, we would miss the mark if we did not develop the TDLE in a way that supports the visitor or commuter in feeling that they have arrived at a “place”, versus simply passing

through. We would like to work with Sound Transit in consciously exploring, designing and incorporating elements that achieve this sense of destination and place.

2. **Equity** – The Equity and Empowerment Framework, adopted by the City Council in 2014, makes equity a consistent guiding principle across City services and policies. Equitable service delivery to residents and visitors is a chief goal of the framework. Equity is also one of the core values identified in *Tacoma 2025*, the City’s Ten-Year Citywide Strategic Plan and Vision adopted by the City Council in 2015. The City supports equitable access to transit and improved access to job centers, consumer amenities and public services. We are aware that Sound Transit is also committed to equity in its service delivery – including maximizing transportation affordability and targeting investment in underserved communities to improve access. We are not only committed, but obligated, to use an equity lens in the development of the TDLE to ensure that its benefits are available to and reach a diversity of populations in our community.
3. **Economic Development** – The City of Tacoma is recognized and expected to serve as a Regional Growth Center for the healthy and sustainable growth of the Puget Sound. In responding to the many challenges and opportunities associated with such growth, the City and the community have consciously made “Economic Vibrancy and Employment” one of our strategic focus areas, as specifically called out in *Tacoma 2025*. We value the light rail extension as a complement and catalyst for economic development. We support Sound Transit’s consideration of economic development as a critical factor and ensuring station locations and the connections between those locations support and promote the economic vitality of our region and City.
4. **Connections** – The vision of Tacoma’s Transportation Master Plan (TMP), an element of the *One Tacoma* Comprehensive Plan, is a sustainable community with many residents, businesses and visitors who have various transportation needs and priorities. The City is strategic in how it plans its transportation system with an emphasis on carrying the people and goods that foster Tacoma’s culture, character, and competitiveness. The transportation system offers multimodal travel options that provide safe access for all users and neighborhoods, encourage healthy living and protect the environment. The TDLE will, without doubt, become a major connection in this vision and, as such, must be consistent with the TMP and the *One Tacoma Plan*.
5. **Urban Fabric** – Transit is recognized today as more than transportation. We look to major cities across our nation for examples of how transit has contributed to and is an integral component of communities that are a tight weave of housing, jobs, entertainment, recreation, services and other qualities of life. We envision the TDLE as a major contributor to that fabric in our community, particularly in the Tacoma Dome Station area where transit-oriented development is occurring at an unprecedented pace. We have a vision for the Dome District as a Transit-Oriented Development hub and a growing, regional Entertainment District (*Tacoma 2025, One Tacoma Plan, South Downtown Subarea Plan*). It is important that the Dome District be viewed as a dense, mixed-use urban area with destination entertainment venues and a high potential for housing development rather than solely as a transit corridor/hub. As indicated previously, the City continues to have concerns about the aesthetic, noise, development and economic impacts associated with a fully elevated corridor, particularly as it travels into Tacoma’s Downtown – in this area in particular, these types of significant infrastructure investments must fit within the already well-established urban



fabric as this is not a place that can be redesigned around the infrastructure. In that vein, the “cut-and-cover” and the “over-the-Sounder” alternatives to the elevated stations and alignments as currently presented that were brought up by participants at Sound Transit’s community workshops, by City staff, and by the Mayor, represent design alternatives that could contribute to the urban fabric of our community and are worthy of further examination. If there are other design alternatives that similarly balance the needs for efficient, convenient transit service while supporting dense, transit-oriented development in a developed urban environment, they should also be explored. Sound Transit must underscore the importance of this factor – integration with and strengthening the existing and planned high-density urban environment – to frame the development of the TDLE.

6. **Multi-Jurisdictional Partnership** – “Partnerships” is also one of the core values and guiding principles identified in *Tacoma 2025*. We are committed to the continuous collaboration with Sound Transit and other jurisdictions and agencies involved in and affected by the TDLE project. In particular, the City applauds Sound Transit’s efforts to date and encourages continued close coordination with the Puyallup Tribe of Indians, one of our most significant partners. Additionally, the City of Tacoma, the Port of Tacoma, and the Puyallup Tribe have entered into a multi-jurisdictional partnership, along with the City of Fife and Pierce County, to develop a subarea plan for the Tideflats area. This plan will refine the land use and transportation assumptions for the areas surrounding the Tacoma Dome, East Tacoma and Fife Stations. We encourage Sound Transit to work closely with the City to account for this planning effort in the development of the TDLE project.

## **B. Technical Issues**

Through the upcoming environmental review and project design phase, the following specific issues deserve in-depth analysis and special consideration:

### **1. Safety**

- a. Transportation safety should be included as an evaluation criterion for all alternatives. The impact of any at-grade crossings, in particular, should be considered. The draft EIS should also describe the improvements which will be made to the roadway network to enhance safety.
- b. Analyze the potential for this infrastructure facility to create new opportunities for blight and undesirable or criminal activities, and potential Crime Prevention Through Environmental Design (CPTED) options and/or other mitigations that could reduce this potential.

### **2. Equitable Access**

- a. Analyze the impacts on equitable access to job centers, consumer amenities and public services.
- b. Access to and from the new stations must be convenient and safe for all residents, employees and visitors. Both of Tacoma’s station locations will require significant analysis and consideration for access, including the proposed East Tacoma Station as it is separated from many of the surrounding destinations by existing infrastructure barriers (Interstate 5, Sounder corridor, etc.)



### **3. Development Potential**

- a. The process must include evaluation of factors relative to how this transit investment can be developed in a manner that is most supportive of economic development, and particularly transit-oriented development, to include maximizing future development potential, avoiding the creation of remnant parcels, and avoiding impacts which may reduce practical or permissible future development due to building offsets, maintenance and constructability concerns, fire and life safety, or related issues.
- b. Analyze route, station locations, and design alternatives to identify options that maximize the potential for dense urban, mixed-use and entertainment developments and minimize the loss of property otherwise available for development, particularly in the Dome District.
- c. Ensure that the station design is integrated into a land use and transportation environment which is significantly denser than the current environment, particularly in the East Tacoma Station area.
- d. The environmental review process must include an examination of consistency with regional transportation and land use plans and the City's adopted policies and plans, including the *One Tacoma* Comprehensive Plan and some of its elements that are most relevant to the projects, such as the Transportation Master Plan and the South Downtown Subarea Plan.

### **4. Visual, Noise and Urban Design Impacts**

- a. Analyze potential visual and urban design impacts, including impacts associated with shading, effects on trees and vegetation, the use and quality of urban public space, obstructing views (especially water views) from planned and future development, the potential for obscured store-fronts and increased signage costs, more difficult access, the potential to physically and psychologically "divide" these neighborhoods, and the potential to limit roadway operations and streetscape design flexibility over time.
- b. Analyze the possible noise and air pollution and evaluate design options and/or mitigations to eliminate or reduce such impacts.

### **5. Archaeological and Cultural Elements**

- a. This corridor passes through areas in close proximity to known culturally significant areas, archaeological sites and designated historic structures, as well as areas that are considered to have a high probability of containing archaeological sites. The environmental review should include an in depth analysis of known elements, potential discoveries and impacts.

### **6. Street Networks**

- a. For the East Tacoma Station, the community noted significant opportunity to reconfigure the existing City street network to enhance the safety and efficiency of access to the project. The City anticipates that some of these reconfigurations may be necessary to adequately provide access to the East Tacoma Station, and that some preliminary design may be required to adequately evaluate the strategies for providing traffic circulation to and from the station.
- b. In the East Tacoma Station area, analyze the impacts to traffic flow on the Portland Avenue corridor, including the impact on freight transportation.

- c. The Transportation Master Plan designates Portland Avenue as a corridor which is important to many modes of transportation, including high-capacity transit and bicycling. Please ensure that the environmental analysis addresses how the alternatives will support the goals in the City's *One Tacoma* Comprehensive Planning documents. The analysis should address how the designs will integrate with the planned modal priorities along Portland Avenue, including how the proposed station will facilitate connections to future high-capacity transit service and how the station location and design will facilitate connections to the surrounding community via active modes of transportation.
- d. The community workshops identified a need to make enhancements in the vicinity of the East Tacoma Station to address the current lack of active transportation facilities. A representative example is the need to improve connections from the proposed station locations to the community which will be most served by the new station, which is on the opposite side of Interstate 5, and the idea that a new pedestrian bridge from the station area to the casino area could address some of this need. The environmental analysis should discuss how the station will integrate with active transportation facilities on Puyallup Avenue, Bay Street, Portland Avenue, L Street, and a potential new bridge over Interstate 5.
- e. We encourage Sound Transit to adopt a design timeline which accounts for the active participation in the upcoming planning exercises associated with the Tideflats Subarea Plan to re-configure the transportation network and re-imagine land uses around the East Tacoma Station. There may also be significant opportunities for partnership between the City, Port of Tacoma, Sound Transit, Puyallup Tribe and others to work together to re-envision this particular area so that it best capitalizes on this significant investment while meeting the needs of so many different stakeholders.

## 7. Multimodal Connections

- a. Evaluation of the alternatives, and the location and design of the stations, should place paramount importance on the connections to other modes. Stations should explicitly accommodate, at a minimum, the following transportation choices: transportation network companies, taxis, charter buses, and other for hire vehicles; pedestrians; bicyclists; dockless bike and scooter share; vanpool and carshare; private shuttles; and local and regional bus transit.
- b. Evaluate traffic circulation to and from the station, including both the surface network serving the station and the loading and parking areas at the station. Management of each trip type—parking, bus, shuttle, taxi, transportation network company, and private curbside service, for instance—should be included in the analysis, including the expected strategies for storing and segregating those trips within the station area. The evaluation should also discuss how the station design will accommodate future flexibility in design to accommodate shifting demand for different modes.
- c. Evaluate the potential impacts of the new station and improvements on the planned modal priorities in the Transportation Master Plan, which shows the key networks for each mode.
- d. The transportation and access evaluation will need to account for large events because of the significant, regional entertainment venues located in these stations areas, including the Tacoma Dome and the new Puyallup Tribal Casino.

## 8. Pedestrian and Bicycle Connections

- a. The analysis should include the degree to which pedestrian access to the new service, and the pedestrian cross-connections to existing services such as Sounder and Tacoma LINK, are separated from other modes. The safety of each connection should be assessed in the environmental documents. For the Tacoma Dome Station, the analysis should consider the extent to which off-street connections can be made directly to other modes of transportation around the area. Safe connections which do not rely solely on the existing connections within the right-of-way will reduce interactions with at-grade rail crossings, intersections, and other potential conflicts.
- b. The City's *One Tacoma* Comprehensive Plan establishes a modal hierarchy which places pedestrians at the highest priority. Pedestrians are assumed to be a priority on every street. The City also views strong pedestrian access as essential to the long-term success of the TDLE. The ease and convenience of active transportation connections should be included as part of the environmental analysis, including whether or not the pedestrian routes are protected from the elements, grade changes, walkway and bikeway widths, bicycle accommodations at stations, running slopes, and the directness and distance of routes.
- c. During the community workshops, several stakeholders mentioned the concept of modifying station locations so that pedestrian access points can be provided on opposite sides of busy streets. This concept would reduce the number of at-grade pedestrian crossings, and should be a design alternative evaluated in the environmental analysis.
- d. Analyze the station locations for best pedestrian connections to job centers and consumer amenities such as shops and entertainment venues, as well as most convenient linkages between transit for tourists and travelers.
- e. Necessary positive outcomes of any transit project must include enhanced personal safety, strong pedestrian and bicycle connections to the rest of downtown and urban amenities such as on street parking in front of shops, walkability and placemaking.

## 9. Parking

- a. Consider parking impacts along the entire transit system (Tacoma LINK, Pierce Transit). The current concept for the East Tacoma Station does not include any associated parking. While the Tacoma Dome Station has the potential to have some of the best multimodal connections in the region, the East Tacoma Station area is not expected to have the same opportunities. The environmental analysis should discuss how people will travel to and from the East Tacoma Station. If parking is provided, the analysis should discuss how the parking will be managed (e.g., by using congestion pricing and/or providing competitive pricing for vanpools) to help maximize ridership and help the City achieve its mobility, safety, and mode split goals.

## 10. Construction and Operation Impacts

- a. The impacts of the operation and construction of the alternatives should be included, including impacts to existing businesses and impacts to existing transportation; particularly transit services operating at Tacoma Dome Station.

- b. Construction of this system will necessitate modifications to existing utility, transportation and other infrastructure. These impacts need to be fully assessed during the environmental review process to ensure the project can be implemented in a way that ensures the continued operation and integration of these other critical facilities.

#### 11. Future Extension

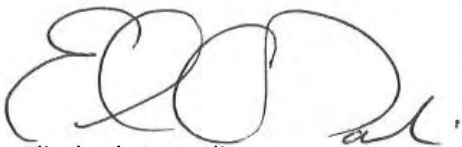
- a. The City's Transportation Master Plan envisions the future extension of Central LINK to the Tacoma Mall Area. This future extension is also incorporated into Sound Transit's long-range plan, and funding for study of this extension was included in the ST3 package. The draft EIS should address the future feasibility of this extension, at least as it relates to station location and design alternatives.

#### 12. Project Delivery

- a. Recognizing the increasing transportation demand of the region, we encourage Sound Transit to explore alternatives which would allow advanced delivery of the project. The evaluation should assess how different alternatives may encourage or discourage the timely completion of the project, including impacts to the feasibility of funding, permitting, or constructability.

Thank you for the opportunity to comment. The City of Tacoma looks forward to our continued partnership on this very exciting project. We believe these types of high-capacity connections are absolutely key to providing the full menu of transportation alternatives necessary to meeting the needs of the region and our growing population in a more sustainable and resilient way. We are committed to continuing to work closely with Sound Transit through the environmental review and project design process to ensure the successful and timely delivery of the TDLE project.

Sincerely,



Elizabeth A. Pauli  
City Manager

- c: Mayor Victoria Woodards and Members of the Tacoma City Council  
Jackie Flowers, Director, Tacoma Public Utilities  
Peter Huffman, Director, Tacoma Planning & Development Services Department  
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