Scoping Summary Report

May 2019
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Table of Contents

1 INTRODUCTION ......................................................................................................................... 1
  1.1 Purpose of this Report ........................................................................................... 1
  1.2 Tacoma Dome Link Extension .............................................................................. 1

2 THE SCOPING PROCESS......................................................................................................... 4
  2.1 Purpose of Scoping ............................................................................................... 4
  2.2 Opportunities to Comment .................................................................................... 4
  2.3 Summary of Participation ...................................................................................... 5

3 SCOPING MEETINGS AND OUTREACH ................................................................................. 6
  3.1 Tribe, Agency, and Jurisdiction Scoping Meeting .................................................. 6
     3.1.1 Notification ................................................................................................. 6
  3.2 Community Open Houses and Listening Session ................................................. 8
     3.2.1 Open House Notification ............................................................................ 8
     3.2.2 Open House and Listening Session Format .............................................. 9
  3.3 Outreach to Minority, Low-Income, and Limited-English-Proficiency Populations .............................................................................................................. 10
  3.4 Online Open House ............................................................................................. 11

4 SUMMARY OF COMMENTS ................................................................................................... 12
  4.1 Summary of Comments from Tribes and Agencies ............................................. 12
     4.1.1 Tribes ....................................................................................................... 13
     4.1.2 Federal Agencies ..................................................................................... 14
     4.1.3 State Agencies ......................................................................................... 15
     4.1.4 Regional and Local Agencies .................................................................. 17
  4.2 Summary of Public Comments ............................................................................ 24
     4.2.1 General or Project-wide Comments ......................................................... 24
     4.2.2 South Federal Way .................................................................................. 28
     4.2.3 Fife ........................................................................................................... 30
     4.2.4 East Tacoma ............................................................................................ 31
     4.2.5 Tacoma Dome .......................................................................................... 33

5 NEXT STEPS ............................................................................................................................. 39
    Project Timeline and Process .................................................................................... 39

6 SUPPORTING DOCUMENTATION AND REFERENCES ..................................................... 40
Exhibits

Exhibit 1  Project Area Map and Potential Alternatives Considered During EIS Scoping .....2
Exhibit 2  Regional System Map .....................................................................................3
Exhibit 3  Online Open House Screen ..........................................................................11
Exhibit 4  Potential Alternatives being Considered in South Federal Way ..................36
Exhibit 5  Potential Alternatives being Considered in Fife .............................................37
Exhibit 6  Potential Alternatives being Considered in East Tacoma and Tacoma..........38
Exhibit 7  Project Timeline............................................................................................39

Tables

Table 1  Online and Print Display Advertisements .......................................................9

Appendices

Appendix A  Federal Register Notice of Intent and SEPA Register Notice
Appendix B  Scoping Information Report
Appendix C  Meeting Advertisements
Appendix D  Scoping Comments from Tribes and Agencies
Appendix E  Scoping Comments from Businesses, Commissions, and Community Groups
Appendix F  Public Scoping Comments
Appendix G  East Tacoma Listening Session Summary
Appendix H  Questionnaire Results

Appendices are available on Sound Transit’s website at: soundtransit.org/tdle.
# Acronyms and Abbreviations

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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<tbody>
<tr>
<td>ADA</td>
<td>Americans with Disabilities Act</td>
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<tr>
<td>Board</td>
<td>Sound Transit Board</td>
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<tr>
<td>BRT</td>
<td>bus rapid transit</td>
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<tr>
<td>COT</td>
<td>Community of Interest</td>
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<tr>
<td>DAHP</td>
<td>Washington State Department of Archaeology and Historic Preservation</td>
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<td>DNR</td>
<td>Washington State Department of Natural Resources</td>
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<tr>
<td>Ecology</td>
<td>Washington State Department of Ecology</td>
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<td>EIS</td>
<td>environmental impact statement</td>
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<td>EPA</td>
<td>U.S. Environmental Protection Agency</td>
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<td>FTA</td>
<td>Federal Transit Administration</td>
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<tr>
<td>FWPD</td>
<td>Federal Way Police Department</td>
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<td>HCT</td>
<td>high-capacity transit</td>
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<td>I-5</td>
<td>Interstate 5</td>
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<tr>
<td>Metro</td>
<td>King County Metro Transit</td>
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<td>NEPA</td>
<td>National Environmental Policy Act</td>
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<tr>
<td>NWSA</td>
<td>Northwest Seaport Alliance</td>
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<td>Port</td>
<td>Port of Tacoma</td>
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<tr>
<td>PSRC</td>
<td>Puget Sound Regional Council</td>
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<td>ROD</td>
<td>Record of Decision</td>
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<tr>
<td>SEPA</td>
<td>State Environmental Policy Act</td>
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<tr>
<td>Sound Transit</td>
<td>Central Puget Sound Regional Transit Authority</td>
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<td>SR</td>
<td>State Route</td>
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<td>ST3</td>
<td>Sound Transit 3</td>
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<tr>
<td>TDLE</td>
<td>Tacoma Dome Link Extension</td>
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<tr>
<td>TOD</td>
<td>transit oriented development</td>
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<tr>
<td>Tribe</td>
<td>Puyallup Tribe of Indians</td>
</tr>
<tr>
<td>WISAARD</td>
<td>Washington Information System for Architectural and Archaeological Records Data</td>
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<td>WSDOT</td>
<td>Washington State Department of Transportation</td>
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1 INTRODUCTION

1.1 Purpose of this Report

Sound Transit conducted scoping for the Tacoma Dome Link Extension from April 1 through May 1, 2019. This report describes the scoping process and summarizes the comments received from agencies, tribes, and the public. **Appendices A through H** provide supplementary information on the scoping process, public outreach, and the comments received.

1.2 Tacoma Dome Link Extension

The Central Puget Sound Regional Transit Authority (Sound Transit) and the Federal Transit Administration (FTA) are conducting scoping activities for an environmental impact statement (EIS) they will prepare for the Tacoma Dome Link Extension (TDLE) project. This project is part of the Sound Transit 3 (ST3) Plan approved by voters in 2016. The project would extend the regional light rail system nearly 10 miles, from the Federal Way Transit Center Station in the city of Federal Way, King County, to the Tacoma Dome Station area in the city of Tacoma, Pierce County. It includes four new stations and a bridge crossing the Puyallup River. **Exhibit 1** shows the location of the TDLE project and potential alternatives being considered during scoping as Sound Transit works to identify which alternatives to evaluate in the Draft EIS. TDLE is a regional capacity project listed as part of The Regional Transportation Plan—2018 (PSRC 2018) prepared by the Puget Sound Regional Council (PSRC) and Sound Transit’s Regional Transit Long-Range Plan Update adopted on December 18, 2014 (Sound Transit 2014a). **Exhibit 2** shows Sound Transit’s regional transit system, including TDLE and other projects that are part of the system expansion.

The TDLE project would be primarily elevated with stations at South Federal Way, Fife, East Tacoma, and Tacoma Dome, and park-and-ride facilities planned in South Federal Way and Fife. The Tacoma Dome Station would serve as a multimodal transit hub, with transfer options to and from Sounder service, Amtrak, Tacoma Link, and Pierce Transit and Sound Transit buses.
Exhibit 1  Project Area Map and Potential Alternatives Considered During EIS Scoping
2 THE SCOPING PROCESS

2.1 Purpose of Scoping

Scoping provides an opportunity for the public to learn about and provide comments on the project as it begins, including the Purpose and Need statement, potential alternatives, and environmental resources to evaluate in the EIS. Scoping supports the project’s overall planning, public involvement, and state and federal environmental approach.

The FTA and Sound Transit have concluded that the project has the potential to result in significant environmental effects and an EIS is needed, as required by the National Environmental Policy Act (NEPA) and Washington’s State Environmental Policy Act (SEPA). Various alternatives to develop light rail in the corridor are being considered for evaluation in the EIS. The light rail alternatives are based on the potential alternatives identified through an alternatives evaluation process that includes input from agencies, tribes, and the public. A scoping notice for the EIS has been published in the Federal Register and the SEPA register (Appendix A).

2.2 Opportunities to Comment

The comment period for scoping was from April 1 through May 1, 2019. During this time, several meetings helped to inform and obtain input from agencies, tribes, and the public.

Three community open houses (public meetings) were conducted (see Section 3.2).

During the scoping process, people were able to provide comments in the following ways:

- Online: tdlink.participate.online
- Email: TDLEscoping@soundtransit.org
- Mail: Sound Transit, TDLE project
c/o Elma Borbe, Senior Environmental Planner
401 S. Jackson Street, Seattle, WA 98104
- Phone (via voicemail): 206-903-7118
- Open Houses: Written comment forms and computer terminals with online commenting input. A court reporter was also present at the open houses to transcribe spoken comments.
- Listening Session in East Tacoma: Written comment forms

In addition to the public meetings, a scoping meeting was held for tribes, agencies, and jurisdictions on the afternoon of April 16, 2019 in Fife. Agency participants were able to learn about the project, ask questions, and provide informal comments in advance of providing their formal scoping comment letters.

Scoping information was summarized in the Scoping Information Report prior to the start of the comment period (Appendix B).
2.3 Summary of Participation

Participation during the scoping period included:

**Tribal, agency, and jurisdiction participation**

- Fifteen representatives attended the Agency Scoping Meeting on the afternoon of April 16, 2019.
- The Puyallup Tribe of Indians (Tribe) and members of several local government agencies attended the Agency Scoping Meeting and community open houses.
- The Tribe and 13 agencies submitted comment letters.

**Public participation**

- More than 200 people attended three community open houses in Federal Way, Fife, and Tacoma and a listening session in East Tacoma.
- Over 3,100 people participated in an online open house.
- Over 650 communications were received. These included narrative feedback and evaluative/quantitative feedback for level of interest in a given alternative.
- Ads on Sound Transit’s Facebook page reached over 34,500 social media users. More than 140 social media user engagements, likes, and retweets were observed on Sound Transit’s Twitter page.
- Several posts were included on Sound Transit’s Facebook page (31,164 subscribers) and Twitter (84,800 followers).
- Posters were placed in 151 different locations throughout the project area between Kent and Tacoma.
- More than 67,460 postcards were mailed to homes, apartments, and businesses in Federal Way, Fife, Milton, and Tacoma.
- One news release and three update notices were emailed to 6,200 email list subscribers.
- Display advertisements (Appendix C) were placed in 13 local online and print publications, as well as promoted posts on Facebook to zip codes in the project area.
- Four briefings were provided to stakeholders in the project area (Downtown On the Go, Tacoma Area Commission on Disabilities, Dome District Tacoma, EL1 Tacoma).
- Field visits/door-to-door outreach reached over 120 businesses, property owners, and residents.
3 SCOPING MEETINGS AND OUTREACH

The scoping period included an agency meeting, three open houses, and a listening session.

As part of the broader community engagement efforts, Sound Transit has also been conducting briefings for city councils and organizations, and regular meetings with the Stakeholder Group, Elected Leadership Group, and Interagency Group.

3.1 Tribe, Agency, and Jurisdiction Scoping Meeting

3.1.1 Notification

An agency scoping meeting to present project information and receive comments was held on April 16, 2019 from 2:00 to 4:00 p.m. at the Fife Community Center, 2111 54th Avenue E, Fife. Sound Transit sent notices for the meeting by email to representatives of the following tribes, agencies, and jurisdictions. Those that attended the meeting are shown with an asterisk.

Tribes

- Puyallup Tribe of Indians*
- Confederated Tribes and Bands of the Yakama Nation
- Muckleshoot Indian Tribe
- Nisqually Indian Tribe

Federal Agencies

- Advisory Council on Historic Preservation
- Bonneville Power Administration
- Federal Aviation Administration, Northwest Mountain Region
- Federal Emergency Management Agency, Region 10
- Federal Highway Administration, Washington State Division*
- Federal Motor Carrier Safety Administration
- Federal Railroad Administration
- Federal Transit Administration, Region 10
- Maritime Administration, Pacific Northwest Gateway Office
- National Oceanic and Atmospheric Administration Fisheries, West Coast Region
- U.S. Army Corps of Engineers
- U.S. Bureau of Indian Affairs, Northwest Region
- U.S. Coast Guard, District 13
- U.S. Department of Homeland Security, Transportation Security Administration
- U.S. Department of Housing and Urban Development, Region 10
- U.S. Department of the Interior, Office of Environmental Policy and Compliance, Pacific Northwest Region
- U.S. Fish and Wildlife Service, Washington Fish and Wildlife Office
- U.S. Environmental Protection Agency, Region 10*
- U.S. Department of the Interior, Office of Environmental Policy and Compliance, Pacific Northwest Region
State Agencies

- Washington State Department of Archaeology and Historic Preservation*
- Washington State Department of Natural Resources
- Washington State Department of Ecology
- Washington Department of Fish and Wildlife*
- Washington State Department of Transportation*
- Washington State Recreation and Conservation Office

Regional and Local Agencies

- City of Federal Way*
- City of Fife*
- City of Kent
- City of Milton
- City of Tacoma*
- City of Auburn
- City of University Place
- King County Department of Development and Environmental Services
- King County Metro Transit
- King County Council
- King County Department of Natural Resources and Parks
- Northwest Seaport Alliance*
- Pierce County
- Pierce Transit*
- Port of Tacoma
- Puget Sound Clean Air Agency
- Puget Sound Regional Council
3.2 Community Open Houses and Listening Session

Sound Transit hosted three community open houses (public meetings) and one targeted listening session to inform and obtain input from the public. More than 200 people attended these events:

- **Open house at Fife Community Center**  
  April 16, 2019, 6:00–8:00 p.m.  
  2111 54th Avenue E, Fife, WA 98424

- **Open house at Greater Tacoma Convention Center**  
  April 17, 2019, 6:00–8:00 p.m.  
  1500 Commerce Street, Tacoma, WA 98402

- **Open house at Federal Way Performing Arts and Event Center**  
  April 23, 2019, 6:00–8:00 p.m.  
  31510 Pete von Reichbauer Way S, Federal Way, WA 98003

- **Listening session at Eastside Community Center**  
  May 2, 2019, 6:30–8:30 p.m.  
  1721 E 56th Street, Tacoma, WA 98404

The listening session was an additional event added to the scoping and outreach program to provide further opportunities for members of the East Tacoma community. The event, which had translators available, allowed community members to discuss their views on the neighborhood that will be served by the new East Tacoma Station, and to provide comments on the Level 2 alternatives. See Appendix G, East Tacoma Listening Session Summary.

All public meetings were held at locations accessible to persons with disabilities. Alternative formats and translation services were available by contacting:

- Alternative formats: 1-800-201-4900
- Translation services: 1-800-823-9230
- Persons who are deaf or hearing-impaired: TTY Relay 711
- Email: accessibility@soundtransit.org

3.2.1 Open House Notification

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

- Postcards to over 67,460 households and businesses, including both owners and renters
- Online and print advertisements in 13 publications (listed in Table 1)
- Posters at 151 locations in the corridor
- One news release and three email update notices
- Social media posts
- Project website
### Table 1
**Online and Print Display Advertisements**

<table>
<thead>
<tr>
<th>Publication</th>
<th>Format and Run Dates</th>
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<tbody>
<tr>
<td>El Siete Dias (translated)</td>
<td>Print: April 1–30</td>
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<tr>
<td></td>
<td>Online: April 1–30</td>
</tr>
<tr>
<td>Federal Way Mirror</td>
<td>Print: April 12 and 19</td>
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<tr>
<td></td>
<td>Online: April 1–May1</td>
</tr>
<tr>
<td>International Examiner</td>
<td>Print: April 10–23</td>
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<tr>
<td></td>
<td>Online: April 5–26</td>
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<tr>
<td>Korea Daily (translated)</td>
<td>Print: April 16 and 20</td>
</tr>
<tr>
<td>Korean Times Seattle (translated)</td>
<td>Print: April 12 and 19</td>
</tr>
<tr>
<td>Northwest Military</td>
<td>Online: April 1–30</td>
</tr>
<tr>
<td>Northwest Vietnamese News (translated)</td>
<td>Print: April 5, 12, 19</td>
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<td></td>
<td>Online: April 5–26</td>
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<tr>
<td>The Seattle Times</td>
<td>Print: April 14 and 21</td>
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<tr>
<td></td>
<td>Online: April 3–24</td>
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<tr>
<td>South Sound Biz</td>
<td>Online: April 1, 3, 4, 8, 10, 11, 15, 17, 18, 19, 22, 23</td>
</tr>
<tr>
<td>Tacoma News Tribune</td>
<td>Print: April 15 and 22</td>
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<td></td>
<td>Online: April 5–26</td>
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<tr>
<td>Tacoma Weekly</td>
<td>Print: April 14 and 21</td>
</tr>
<tr>
<td></td>
<td>Online: April 12–26</td>
</tr>
<tr>
<td>Tu Decides (translated)</td>
<td>Online: April 12 and 19</td>
</tr>
<tr>
<td>Weekly Volcano</td>
<td>Print: April 4–17</td>
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#### 3.2.2 Open House and Listening Session Format

The open houses presented the project Purpose and Need statement, the latest route and station options, and process/timeline. The listening session in East Tacoma presented the project background and primarily presented information about the East Tacoma and Tacoma Dome station areas. A summary of the East Tacoma listening session is provided in **Appendix G, East Tacoma Listening Session Summary**.

Laptops were set up at the venues for attendees to review the online open house materials and submit comments. Sound Transit project staff were available to answer questions. A court reporter was present to transcribe attendees' verbal comments.
3.3 Outreach to Minority, Low-Income, and Limited-English-Proficiency Populations

Sound Transit’s community engagement procedures, Executive Order 12898, U.S. Department of Transportation Order 5610.2(a), and Federal Transit Administration Circular C 4703.1 require Sound Transit to provide meaningful opportunities for minority, low-income, and limited-English-proficiency groups to engage in the planning process. Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, or national origin. These directives make environmental justice a part of the decision-making process by identifying and addressing disproportionately high and adverse human health and environmental effects of Sound Transit’s programs, policies, and activities on minority and low-income populations. Sound Transit conducted a preliminary demographic analysis to identify minority, low-income, and limited English proficiency populations. Based on this analysis, Sound Transit used the following strategies to engage these populations during scoping:

- Provided translated text on posters in Spanish, Vietnamese, and Korean
- Provided translated meeting handouts in Spanish, Korean, Vietnamese, Khmer, and Russian
- Publicized events online and in print with language-specific media publications
- Provided tactile interpreters at the Tacoma open house and Spanish, Cambodian, and Vietnamese interpreters at the East Tacoma listening session
- Provided translated text on the online open house web pages, as well as the embedded Google Translate tool that can translate text into over 100 languages
- Conducted a listening session in East Tacoma to more directly engage people at a community center in an area with a high proportion of people of color, people who are economically disadvantaged, and people who speak languages other than English

As the project moves forward, Sound Transit will conduct additional interviews with community leaders, jurisdictions, and social service providers to seek input and identify additional ways to reach low-income, minority, and limited-English-proficiency populations.
3.4 Online Open House

An online open house was available at tdlink.participate.online during the scoping period to inform the public about the project and provide an opportunity to give feedback. All content presented at the open house was posted on the online open house (Exhibit 3). A video embedded on the home page explained the route and station refinement process, offering English audio as well as English subtitles for hearing-impaired users. The subtitles were translated to multiple languages including Khmer, Korean, Russian, Spanish, and Vietnamese.

Between April 1 and May 1, 2019, over 3,100 unique visitors accessed the online open house over 3,900 times in total. Visitors were given the opportunity to comment on the project’s Purpose and Need statement, topics to study in the environmental review phase for the Draft EIS, and respond to a questionnaire on the latest route and station options.

Users could offer generalized comments about the project or indicate specific routes and stations they wanted to comment on.
4  SUMMARY OF COMMENTS

This section summarizes the comments Sound Transit received during scoping. Appendix D, Scoping Comments from Tribes and Agencies, includes the full letters received from each entity. Correspondence from businesses, commissions, and community groups is included in Appendix E. Appendix F, Public Scoping Comments, includes all of the other public emails, letters, comment forms, online notes, and information received.

Sound Transit asked for input on the:

- Draft Purpose and Need
- Route and station options (alternatives) to consider in the Draft EIS
- Topics to study in the Draft EIS

Sound Transit received a total of 654 communications during the scoping period, 519 of which were received through the online open house. Sound Transit received 135 communications through other comment opportunities, including 28 emails, 2 voicemail messages, 39 mailed letters, 60 written comment forms, and 6 statements recorded with a court reporter. One of the letters included a petition signed by nearly 500 people.

Exhibits 4 through 6 show the alternatives considered during scoping and are included at the end of this chapter for reference.

4.1  Summary of Comments from Tribes and Agencies

Scoping comment letters were received from one tribal government and 13 agencies. In addition, the U.S. Bureau of Reclamation responded that they had no comments. The following tribes and agencies submitted comments during the scoping period:

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, Mayor
- City of Fife, Directors of Public Works and Community Development
- City of Tacoma

The comment themes are summarized by entity in Sections 4.1.1 through 4.1.4.

4.1.1 Tribes

Puyallup Tribe of Indians

The Tribe submitted comments describing their position on several station locations, crossings, and alignment configurations.

South Federal Way

- State Route (SR) 99 alignment: An SR 99 alignment would pose a multitude of property impacts to tribal trust members.
- Interstate 5 (I-5) alignment: The Tribe prefers this alignment because there are fewer impacts to tribal property along I-5. While potential cultural resource impacts exist near the St. George property, the impacts can be properly addressed (minimized or avoided) through consultation with the Tribe’s Historic Preservation Department.
- SR 167 project: It is important for Sound Transit and the Washington State Department of Transportation (WSDOT) to work collaboratively with the Tribe to ensure that efforts to enhance Hylebos Creek are not conflicted by the two projects.

Fife

- The Tribe recognizes the City of Fife’s plans and supports the Fife 3A and 3B station locations in order to capture potential riders traveling to Tribal enterprises.
- West of the station, the Tribe supports continued study for alignments along the south side of SR 99 and along the north side of the I-5 right-of-way. The Tribe recognizes Sound Transit will likely need an easement on the Integrative Medicine Building property.
- The Tribe is opposed to an alignment along the north side of SR 99 between 46th Avenue E and Alexander Avenue, as this path would significantly impact Tribal facilities, businesses, residences, and trust lands.
Puyallup River Crossing

- The Tribal Council is pleased that multiple options to span the Puyallup River, including a clear span, are being explored. If any in-water piling options are pursued, strong mitigation measures to prevent impacts to the Tribal Fishery must be explored as part of the EIS process.
- The Tribe is pleased that the pre-scoping process eliminated alignments that would impact the Tribe’s Ceremonial Grounds.

East Tacoma

- The Tribe supports the ET 3A and ET 3B station locations as part of the preferred alternative, with ET 6 being an important station location to study in the EIS.
- ET 1 and ET 2 are not supportive of ridership and connectivity, and ET 5 would impact individual member trust lands.
- The Tribe is interested in future consideration for Sound Transit parking facilities for the East Tacoma station area.

Tacoma

- The Tribe prefers alternatives TD 2 and TD 3 for continued study.
- The TD 4 East Off-Street alternative should be removed from further study.
- The TD 4 East In-Street alternative is undesirable but warrants further study in a nearby location that does not impact the frontage of Tribe property.
- The TD 4 West and TD 1 alternatives are poor location choices due to congestion impacts on East D Street and the distance in connecting to other transit options.
- The Tribe is deeply concerned with the possibility of tunneling in the Tacoma Dome station area because of the high probability of cultural and human remains in the area. An underground station would expose the project to potential catastrophic risks that could end up being immitigable and prevent completion of the project.

4.1.2 Federal Agencies

U.S. Environmental Protection Agency

The U.S. Environmental Protection Agency (EPA) listed the subjects (as identified in the Federal Register and on the project website) that are likely areas of investigation for possible adverse effects and should be addressed in a NEPA analysis.

EPA recommends that the EIS include a reasonable range of alternatives that meet the stated purpose and need, meet the goals and objectives, and respond to issues identified during the scoping process. EPA stated that situations can arise in which adverse impacts occur despite regulations being met and provided an example of this regarding air toxics.
Additionally, EPA pointed out that the alternatives do not currently appear to overlap with Superfund sites; however, the question of overlap with hazardous materials sites that have undergone active remediation or overlap with habitat mitigation sites associated with active remediation should be assessed and addressed in the EIS.

EPA also provided specific recommendations for the aquatic resource analysis and guidance associated with the Clean Water Act, and further stated that the EIS should disclose whether air toxics emissions would result from the project construction or operations, discuss health effects associated with air toxics and diesel particulate matter, and identify sensitive receptors.

EPA’s recommendations for the route selection and project design include:

- Protect and enhance natural areas and corridors
- Maximize the use of existing infrastructure
- Consider redevelopment
- Apply context sensitive design
- Apply zero- or low-impact development
- Apply green building and management practices

EPA further recommends conducting community impact assessments for the communities and neighborhoods that would potentially be most affected by the proposed project.

For environmental justice, EPA recommends that outreach include tribes, minority and low-income communities, and other vulnerable populations, as well as the use of EJSCREEN. An analysis of impacts to children’s health and safety should be included. Information gathered from the public participation process should be factored into decision-making and disclosed in the EIS.

Finally, EPA stated that the project evaluation should consider cumulative and indirect impacts and provided information about their guidance for consideration of cumulative impacts. EPA also mentioned tribal consultation, invasive species, and climate adaption.

4.1.3 State Agencies

Washington State Department of Archaeology and Historic Preservation

The Washington State Department of Archaeology and Historic Preservation (DAHP) provided the following comments:

- Archaeological Resources: DAHP did not identify major concerns but anticipated the Hylebos Creek drainage and the Puyallup River crossing areas would be “high probability areas” for containing archaeological resources. DAHP expects that if the track is elevated in the Tacoma area, locations where deep foundations are needed will need to be investigated. A geotechnical boring program is presumed.

- Historic Resources: DAHP believes several historic properties will be identified along the Old Pacific Highway/Pacific Highway E that are not currently in the Washington
Information System for Architectural and Archaeological Records Data (WISAARD). Effects may be avoided or minimized through the way the project would be incorporated into the existing transportation network, or by selecting an alternative that does not extend along Pacific Highway.

**Washington State Department of Ecology**

The Washington State Department of Ecology (Ecology) provided the following comments:

- **Air Quality and Climate Change**: The EIS should address the greenhouse gas emissions of the project itself, including management of climate resilience strategies.

- **Water Quality**: 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 storm drains that lead to waters of the state.

- **Ecology also provided details about construction activities that require a Construction Stormwater General Permit.**

**Washington State Department of Natural Resources**

The Washington State Department of Natural Resources (DNR) stated that at this time, the proposal does not impact aquatic lands owned by the state of Washington and managed by DNR; therefore, no approval from DNR is required for the proposed activity.

**Washington State Department of Transportation**

WSDOT fully supports the Purpose and Need statement and encouraged the TDLE project to continue working with local jurisdictions to develop safe and direct active transportation (e.g., walking and bicycling) access to future light rail stations and to encourage transit oriented development (TOD) in station areas.

As the TDLE project team refines the alignment options that will be analyzed in the 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**

WSDOT made the following statements about specific alignment and station options:

- **South Federal Way**: SF 8 and SF 9 have lower potential property impacts but limited walkshed and TOD potential. Sites SF 2 West, SF 4C and SF 4D all have greater TOD potential as well as better multimodal access.

- **Fife**: All station options support the City of Fife’s proposed redevelopment. WSDOT encourages Sound Transit to work with the City to ensure suitable pedestrian access.
Sound Transit will be required to perform soil analysis to verify conditions for the project and redevelopment, and address potential climate change impacts to low-lying areas. As the project heads west of the station to the Puyallup River, no I-5 or SR 99 right-of-way is available to accommodate the light rail guideway; therefore, private or tribal property will be needed.

- **East Tacoma**: Sound Transit should continue to work with WSDOT and the City of Tacoma to address the current poor pedestrian environment along Portland Avenue under I-5. The station options that are closer to I-5 (ET 3A, ET 3B, and ET 5) have a shorter distance to destinations on the south side of I-5.

- **Tacoma Dome**: 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 transfer opportunities. TD 2 is the best site for addressing the multimodal access and transfer opportunities at this location.

### 4.1.4 Regional and Local Agencies

**Port of Tacoma and Northwest Seaport Alliance**

The Port of Tacoma (Port) and Northwest Seaport Alliance (NWSA) stated that they generally support the Purpose and Need statement. They proposed amending one of the statement’s bullets and adding a new bullet to recognize the uses within the Port of Tacoma Manufacturing/Industrial Center and freight infrastructure.

The Port and NWSA provided several comments on the potential alternatives, including:

- **Fife Station**: The agencies remain concerned that traffic related to the station locations (Fife 1, 3 and 4) has the potential to affect overall traffic congestion and freight mobility in the area. The EIS should evaluate freight effects along a corridor, not just a single intersection level, and include other relevant intersections in the analysis.

- **Puyallup River Crossing**: The EIS should evaluate the potential impact of the different crossing locations on both existing and future freight rail infrastructure.

- **East Tacoma Station**: The EIS must assess freight impacts and 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.

The Port and NWSA also provided comments on the elements of the environment and topics to analyze in the EIS. Comments on these elements (transportation, land use, economy, public services, safety and security, and cumulative impacts), relate to the Port and NWSA’s objective and their support for an integrated and robust transportation system that maintains Puget Sound's economic competitiveness and sustainability.
Puget Sound Regional Council

PSRC asked for the 2018 Regional Transportation Plan to be mentioned in the Purpose and Need statement. The letter also encouraged 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. PSRC’s regional displacement risk analysis may provide additional information and data for future study in the EIS.

PSRC also recommended that TOD be explicitly called out as a topic to be addressed in the EIS and suggested that Sound Transit continue to include robust TOD analysis as a component of the EIS, similar to the work completed for the Federal Way Link Extension. As part of the TOD analysis, PSRC also suggested that the subject of door-to-door travel time would enrich the discussion of TOD potential in the EIS.

King County Metro Transit

King County Metro Transit (Metro) stated that their top three issues and needs concerning the project are as follows:

- Maintaining reliable and efficient service will be essential to providing mobility throughout this area of the county, especially to priority populations.

- If stations are located in the vicinity of I-5 and the associated alternative alignments, it will likely be more difficult for Metro to maintain reliable and efficient service and optimize rail/bus transfers than if stations are located further to the west.

- Metro’s preferred South Federal Way station location is in the vicinity of the Metro-owned South Federal Way Park-and-Ride. The SF 4 alternative is located in proximity to this park-and-ride, which is currently underutilized and provides opportunities for adequate project parking capacity (over 500 parking spaces) and/or TOD. Further, this site offers the best conditions for reliable connections to transit for Metro’s shared customers, as well as greater opportunity for mixed-use development and transit partnerships.

During the scoping period, Metro planning staff considered the EIS Scoping Information Report, which identifies the draft Purpose and Need statement and contains several objective statements, in their review of the station locations. Based on the station locations presented as alternatives with greater potential, Metro would prefer SF 2 West (West Enchanted/352nd). 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 TOD, and rank the lowest in terms of multimodal connections. The SF 4 options, because of the proposed location of the SF 4 station, are better able to meet regional mobility needs and have the greatest potential for ridership expansion at the South Federal Way station.

Pierce Transit

Pierce Transit made comments relevant to all stations. Specifically, they requested incorporating layover space in station design and highlighted the importance of TOD in decision-making for station locations. They also commented specifically on each station area,
ranking alternatives in order of preference according to transit integration and maximization of nonmotorized access.

- South Federal Way – SF 4; SF 2 East/West and SF 3; SF 8 and SF 9
- Fife – Fife 4A/B; Fife 3A/B; Fife 1
- East Tacoma – ET 3A/B; ET 5; ET 2; ET 1 and ET 6
- Tacoma Dome – TD 2; TD 3; TD 1; TD 4 East/West

Pierce Transit also recommended that Sound Transit focus on safe and efficient nonmotorized access to the East Tacoma station to maximize ridership because current plans do not include a parking structure.

**City of Federal Way (Public Works Director and Community Development Director)**

The City of Federal Way Public Works and Community Development directors provided technical comments on the alternatives in the South Federal Way station area. The City directors made several general comments that applied to all alternatives in the station area, which were primarily transportation-related, and also made comments specific to each alternative.

They wrote that increased traffic congestion in the immediate vicinity of the proposed station may require roadway improvements or new roadway connections, including areas of concern along S 348th Street, S 352nd Street, S 356th Street, Pacific Highway S, and SR 161. Additionally, nonmotorized access improvements may be required to address gaps in the pedestrian and bicycle network surrounding the proposed station, which would improve access to the existing South Federal Way Park-and-Ride.

The directors wrote that all station alternatives may have challenges with bus transit services, including street network access points and queuing accommodation. They recommended evaluating structural impacts to existing pavement if transit were to be rerouted on roadways that were not designed for transit vehicles. The comments also suggested that the proposed station’s proximity to SR 18 and SR 161 will likely generate trips from southeast King County, northeast Pierce County, and northeast Tacoma, all of which have minimal transit services. Therefore, they conclude that most trips will take place via single occupant vehicles, which will increase the likelihood of illegal parking in surrounding retail parking lots due to minimal on-street parking within a quarter-mile of all station locations.

The City directors asked Sound Transit to coordinate with the City and other relevant agencies regarding potential impacts to City transportation projects, including the City Center Access project, the S 324th Street Extension project, the I-5/SR 18/SR 161 Triangle project (taking place from 2025 to 2027), and other current and planned projects within City limits.

Additional comments included the following:

- The directors mentioned extensive coordination between the City and Belmor Mobile Home Park regarding recent redevelopment and a submitted comprehensive plan
amendment. They asked that Sound Transit coordinate with the mobile home park regarding the project’s potential impacts to future development.

- The directors noted that the Federal Way Police Department (FWPD) expects an increase in emergency calls as a result of the project, and that impacts to police operations should be evaluated in the EIS. They also suggested that Sound Transit consider a joint security substation in the vicinity of the South Federal Way station.

- The directors requested a financial analysis of property acquisition associated with each alternative and the resulting impacts to business and property tax revenue.

Comments specific to the South Federal Way alternatives included the following:

- **SF 2 West and SF 2 East:**
  - When comparing the two SF 2 alternatives, SF 2 West would have fewer impacts to existing businesses and infrastructure improvements, fewer barriers to nonmotorized access from the west of Enchanted Parkway, and more benefits associated with a location north of S 352nd Street, including multimodal station access, reduced traffic congestion, and high TOD potential.
  - The directors requested that the EIS include evaluation of wetland and stream impacts to the East Fork of Hylebos Creek for both SF 2 West and SF 2 East, and noted that any mitigation must be completed within City limits in the Hylebos watershed.

- **SF 3:**
  - Comments noted that SF 3 would be similar to alternatives SF 8 and SF 9, although impacts to businesses would be greater and costs would be higher.

- **SF 4A through SF 4D:**
  - The Pacific Highway alignment north of the proposed SF 4 station is unpopular with City staff and elected officials due to completed roadway improvements along the highway that cost a considerable amount of time and money. Also, this alignment would require additional right-of-way acquisition, which would fragment parcels and curtail business development along the highway.
  - The Pacific Highway alignment south of the proposed SF 4 station would result in substantial impacts to critical areas. The directors requested that the EIS include evaluation of wetland and stream impacts to the West Fork of Hylebos Creek resulting from this alignment, and noted that any mitigation must be completed within City limits in the Hylebos watershed.
  - The SF 4 station would be located closer to residential, office, and medical land uses along Pacific Highway S, and this area is better served by buses only, without the added congestion at the S 348th Street intersection that would result from the addition of the station. Additionally, the SF 4 station is within a critical aquifer recharge area and a wellhead capture zone. The EIS should include a
discussion of wellhead monitoring, mitigation, and other foreseeable environmental impacts.

- SF 8 and SF 9:
  - The directors asked that the EIS evaluate the need for a pedestrian bridge over I-5 and noted that the TOD potential for SF 8 and SF 9 is lower than that of stations SF 2 West and SF 4. They also noted that SF 8 and SF 9 would straddle parts of the I-5/SR 18/SR 161 Triangle project at S 356th Street, including the I-5 southbound off-ramp and a two-lane roundabout.

City of Fife (Mayor and City Council)
The City of Fife strongly favors Fife 3B as the preferred alternative and Pacific Highway as the preferred alignment. For the EIS, the City requested a detailed financial analysis of property impacts for the area extending between 54th Avenue E and Port of Tacoma Road. Additionally, the City directed the Fife Community Development Director and Public Works Director to submit a separate and more detailed scoping letter.

City of Fife (Public Works Director and Community Development Director)
As directed by the City Council, the directors of Public Works and Community Development submitted detailed comments for the Fife station area and light rail alignment.

Station area:
- The City of Fife favors Fife 3B as the preferred alternative because it is the most consistent with the comprehensive plan and transportation infrastructure plans, whereas Fife 1 and Fife 4 are less consistent with these plans.
- The directors requested several design modifications such as shifting the station west to span the new street, maintaining an east-west alignment east of 54th Street, and curving the alignment southwest of the commercial center where the Poodle Dog restaurant is located.
- Additional requests included a parking demand analysis, improvements to alternate modes of travel, identification of nonmotorized connections, and use of low-impact development best management practices.

Alignment:
- Between the Fife/Milton city limits and the Fife station:
  - The directors requested an archaeological analysis of cultural resources in consultation with the Tribe, an analysis of critical areas pursuant to Fife Municipal Code Title 17, and a viewshed analysis for residences in proximity to Pacific Highway and SR 167.
  - They also requested that Sound Transit identify locations for stormwater treatment, construction staging sites, station access street improvements, and short-term construction impacts, and asked that the alignment avoid impacts to a planned frontage road along the new Gateway freeway.
Between the Fife station and the Puyallup River:
   - The City favors the Pacific Highway alignment because it preserves the opportunity for an additional station, allows for more nonmotorized connections, and increases redevelopment potential post-construction. The alignment should then transition from Pacific Highway to I-5 at the Port of Tacoma interchange to avoid impacts to commercial properties.
   - The City also stated that the I-5 alignment is not preferable because of visual impacts, environmental justice concerns, impacts as a result of property acquisition, and conflicts with potential and planned improvements to I-5.

The City directors requested an additional property impact analysis for the area between 54th Avenue E and Port of Tacoma Road. The directors would prefer that the 4-mile segment in Fife be split into smaller sections, specifically to more accurately compare alternatives Fife 3A and Fife 3B. According to the directors, the analysis should include the original evaluation matrix in addition to short- and long-term construction impacts to businesses, impacts to property and sales taxes, and impacts to emissions, viewsheds, and utilities.

City of Tacoma

The City Council expects to take legislative action in late May or early June 2019 to provide recommendations on station options and comments on what should be studied in the EIS process. In its letter, the City of Tacoma stated a set of core values that it had defined for the TDLE project to maximize its potential to connect Tacoma to the Puget Sound region and meet other goals of the City. These core values include:

- Destination City – Tacoma is the second-largest city in the Puget Sound region and is responsible for absorbing a major share of the population and employment growth in the region. The TDLE project should develop a sense of “place” in Tacoma.
- Equity – The City supports equitable access to transit and improved access to job centers, consumer amenities, and public services, and wants to ensure that the TDLE project benefits the diverse populations in the community.
- Economic Development – The City is a Regional Growth Center and values light rail as a catalyst for economic development throughout the region.
- Connections – The TDLE project must be consistent with the Tacoma Master Plan and the One Tacoma comprehensive plan, which aim to offer multimodal travel options that provide safe access to users, encourage healthy living, and protect the environment.
- Urban Fabric – Transit is more than transportation; it integrates housing, jobs, entertainment, recreation, services, and other aspects of life. The TDLE project must balance the needs for efficient, convenient transit while supporting dense TOD in an already developed urban area. The City requested that “cut-and-cover tunnel” and “over the Sounder” alternatives be considered for their ability to support the urban fabric of the Tacoma Dome District.
- Multi-Jurisdictional Partnership – The City is committed to collaboration with Sound Transit and other jurisdictions and agencies involved in the TDLE project, including the
Puyallup Tribe. Additionally, the City encourages continued coordination between Sound Transit and the multi-jurisdictional partnership that is creating a subarea plan for the Tideflats area.

The City provided comments about the project’s environmental review and design, asking for more in-depth analysis in several areas:

- **Safety** – The City requested that transportation safety be included as an evaluation criterion. It also requested that the Draft EIS describe roadway improvements to enhance safety and analyze the potential for increased crime.

- **Equitable Access** – The City requested more in-depth analysis of impacts to equitable station access for all residents, employees, and visitors, including East Tacoma, which is surrounded by infrastructure barriers.

- **Development Potential** – The City requested evaluation of factors that ensure the project maximizes economic development, especially TOD, and avoids impacts to future development, including maintenance and safety concerns. They also wrote that the environmental review process must include examination of regional transportation and land use policies and plans.

- **Visual, Noise, and Urban Design** – The City requested analysis of visual and urban design impacts (including for planned development), the use and quality of open space, the potential to divide neighborhoods and limit roadway operations, and impacts associated with noise and air pollution.

- **Archaeological and Cultural Elements** – The City requested an in-depth analysis of known and potential cultural, archaeological, and historical elements.

- **Street Networks** – The City noted several opportunities to reconfigure the street network surrounding the East Tacoma station to enhance safety and access to the station. The City also requested an analysis of traffic flow on Portland Avenue, including impacts to freight and nonmotorized transportation, and an evaluation of connection methods between the East Tacoma station and the community south of I-5.

- **Multimodal Connections** – The City highlighted the importance of multimodal connections during alternatives evaluation and requested an analysis of traffic circulation in the station areas that discusses both existing and future transportation needs.

- **Pedestrian and Bicycle Connections** – The City highlighted the importance of pedestrian access in its planning documents and requested more detailed analysis of pedestrian access and safety for existing and future transportation modes surrounding TDLE stations.

- **Parking** – The City requested that parking impacts be considered along the entire TDLE corridor, including management of parking at stations without new parking garages.

- **The City provided additional comments regarding construction and operation impacts, including impacts to existing transit services at the Tacoma Dome Station. The City also**
commented on future extensions and project delivery, and asked for the EIS to address potential impacts to existing infrastructure.

Three City of Tacoma commissions submitted scoping comments: the Planning Commission, the Sustainable Tacoma Commission, and the Transportation Commission. Statements from these letters are summarized in Section 4.2.4 East Tacoma and Section 4.2.5 Tacoma Dome, under impacted businesses and community groups.

4.2 Summary of Public Comments

During the scoping period, 289 communications were submitted by organizations, businesses, and members of the general public. Of these communications, 40 were submitted by potentially impacted businesses and approximately 15 were submitted by organizations or community groups, including a church with a petition signed by nearly 500 people. Multiple comments were made within many of these communications.

The full set of public communications received during scoping are included in Appendix E, Scoping Comments from Businesses, Commissions, and Community Groups, and Appendix F, Public Scoping Comments.

Questionnaire

Comment forms, available online and as hard copies at the open houses, included a questionnaire for people to mark their interest in route and station alternatives. Sound Transit received 387 responses from online and hard copy comment forms. Appendix H contains the detailed questionnaire results.

4.2.1 General or Project-wide Comments

The most common general themes contained in the public comments were the following:

General Project Comments

These comments were mostly related to project design, budget and funding, community outreach, project schedule, and the overall screening process.

- Project design – About 60 comments were related to design, including design modifications to the alternative alignments and stations, potential I-5 overcrossings, and potential site-specific design modifications.
- Budget/funding – About 30 comments were related to TDLE and general ST3 funding, including taxes, car tabs, and a desire to keep the TDLE within budget.
- Community outreach – About 35 comments were related to community outreach, focusing on a desire to see members of the impacted communities represented in outreach efforts and partnerships with government agencies and community groups involved in completion of the project.
- Project schedule – About 15 comments mentioned the TDLE project schedule, indicating a desire for the project to be completed on schedule.
• Screening process and environmental concerns: About 70 comments indicated thoughts about the project’s screening process and related environmental issues that should be studied in more detail in the EIS. The topics included impacts to and benefits for environmental justice populations, impacts to businesses, transportation impacts (multimodal connections, general/freight traffic impacts, and station access), TOD and redevelopment opportunities, and impacts to environmentally critical areas.

Additionally, some comments were made regarding other station areas that indicated design modifications or new alternative ideas that would potentially locate the TDLE alignment entirely within or directly adjacent to the I-5 right-of-way.

**Purpose and Need Statement**

About 10 comments on the EIS Purpose and Need statement were received from agencies, community groups, and the general public. Comments received from agencies included (also summarized in Section 4.1):

• EPA recommended the EIS include a reasonable range of alternatives that meets the stated Purpose and Need.
• WSDOT commented that they fully support the Purpose and Need statement.
• The Port of Tacoma/NWSA suggested revising draft Purpose and Need statement to include manufacturing and freight infrastructure.
• PSRC asked that the 2018 Regional Transportation Plan be mentioned in the Purpose and Need statement.

Transportation Choices Coalition suggested incorporating health and safety into the Purpose and Need statement. Other comments from the public included encouraging more specific wording on sustainability, environmental justice, and economic impacts.

**Alternative Preferences**

About 200 comment statements were in support of a specific alignment or station alternative, spread throughout the four station areas. Approximately 125 comments were opposed to a specific alignment or station alternative. The preferences are described by segment in Sections 4.2.2 through 4.2.5.

**Other Alternatives**

About 55 comment statements proposed new alternatives and station configurations, which largely centered on the Tacoma Dome station area. About 35 of these comments suggested an underground Tacoma Dome alignment and station, with 15 comments specifically asking for more study of a cut-and-cover tunnel alternative. About 5 comments mentioned a potential alignment and station over the existing Sounder tracks.

**Transportation and Parking Impacts**

About 70 comments mentioned traffic concerns, primarily related to the project’s potential impacts on congested roadways in commercial areas. Approximately 15 comment statements specifically mentioned impacts on freight transportation within Fife and Tacoma, highlighting the importance of connections between the Port of Tacoma and transportation corridors.
80 comments highlighted concerns about parking, primarily related to whether the parking garage capacity at stations is sufficient to meet demand at stations, as well as alignment impacts on private parking lots. About 15 comments mentioned alignment impacts to private driveways or alleyways.

**Multimodal Connections**

Approximately 140 comment statements expressed a desire for excellent multimodal connections and transfer opportunities at station locations, highlighting connections to other transit services, station access for nonmotorized modes, specific ADA access and universal design considerations, micro-transit connections, and vehicular drop-off areas. About 105 comments specifically mentioned pedestrian station access.

**Transit Oriented Development**

Approximately 105 comment statements mentioned TOD or redevelopment opportunities, often as an indication of support for a particular station or alignment. About 15 comments on TOD potential within the Tacoma Dome station area expressed concern about the compatibility of an elevated structure with existing, planned, and future developments.

**Future Extensions**

Approximately 35 comment statements mentioned future extensions, highlighting specific extensions beyond the Tacoma Dome station such as to the Tacoma Mall. Additional comments noted the ability of the TDLE to connect to future extensions of other transit service, such as the extension of the Tacoma Link to the East Tacoma station area.

**General Environmental Concerns**

Approximately 35 comment statements expressed concern for environmentally critical areas. The areas of most concern were Hylebos Creek and its associated wetlands, the Puyallup River, and the tideflats of Tacoma and Fife. About 25 comments highlighted concern about potential negative construction impacts, while 20 comments mentioned impacts to fish and wildlife habitats. Additional comments related to other environmental impacts including noise/vibration, parks/open space, and energy use/utilities.

About 10 comment statements mentioned potential impacts to the light rail infrastructure due to future climate change.

**Economic Impacts and Property Acquisition**

Approximately 140 comment statements indicated a concern about property acquisition and associated effects on businesses and residences. About 50 comments specifically expressed concerns about the project’s impacts on the local economy, primarily relating to lost tax revenue and lost jobs stemming from business displacement. Additionally, some potentially impacted businesses submitted comments concerning financial hardships that might occur if they were relocated. Approximately 95 commenters concerned about property acquisitions specifically mentioned the South Federal Way and Fife station areas.
Environmental Justice

About 40 comment statements expressed concern about potential project impacts to and benefits for environmental justice populations. Comments highlighted specific concerns about the potential for residential displacement among historically disadvantaged populations and potential displacement of minority-owned businesses. Comments also noted the potential for impacts to tribal land and water resources, as well as a desire for community members to be represented on project teams in future public outreach efforts.

Community Advocacy Groups

Four community advocacy groups submitted related letters: the Transportation Choices Coalition, Downtown On the Go, the Puyallup Watershed Initiative Active Transportation Community of Interest, and Futurewise.

The Transportation Choices Coalition is a statewide nonprofit organization that advocates for affordable, reliable, accessible, and sustainable transit. Their letter provided comments regarding station access and mobility, future transit goals, displacements, and environmental justice.

- Station Access – The letter suggested incorporating health and safety into the Purpose and Need statement and recommended more detailed analysis on station visibility, quantity and quality of light rail crossings, transit transfers and level of service, multimodal integration of nonmotorized facilities, and access mitigation during project construction.

- Future-Oriented System – The letter emphasized future light rail expansion, bus and station integration, station capacity and accessibility, and land use planning, as these topics relate to population growth and increased ridership. The letter also stressed consideration of future technology advancements and climate resilience.

- Displacements – The letter expressed concerns about disproportionate displacements of certain demographics and potential long-term economic and cultural impacts such as gentrification. It recommended that Sound Transit formulate a plan to communicate with and justly compensate hard-to-reach populations including renters, non-English speakers, and undocumented persons.

- Environmental Justice – The letter recommended a more robust analysis of environmental justice impacts by disaggregating data by race and income for all EIS disciplines, considering cumulative impacts on historically marginalized populations, using a racial equity toolkit to prioritize mitigation for these populations, and shifting demographic language in the EIS.

Downtown On the Go expressed preference for alternatives ET 3A and ET 3B in East Tacoma and alternatives TD 2 and TD 3 at Tacoma Dome. Their letter highlighted the importance of integrating the station into the existing transit system and expanding multimodal transportation options, especially pedestrian and bike connections. They recommended that the project be integrated with current and future transportation projects including the Tacoma to Puyallup Trail...
Connection, the Pierce Transit Bus Rapid Transit (BRT) project, and the City of Tacoma’s Puyallup Avenue Multimodal Redesign.

The Puyallup Watershed Initiative, Active Transportation Community of Interest (COI) is a community coalition whose goal is to promote safe, healthy, and affordable active transportation options for all. The COI provided comments regarding the safety of Link riders who walk, bike, and take transit to and from the stations. The COI noted that there are current barriers to safely using these modes of transportation and would like Sound Transit to invest in infrastructure improvements for safety and accessibility, especially for residents of Tacoma’s Eastside neighborhood. The COI supports the Transportation Choices Coalition and their statements made about equity, displacement, and environmental justice, and hopes that these elements are included in the EIS and throughout project implementation.

Futurewise is a statewide nonprofit organization that advocates for sustainable and equitable housing, transportation, and environmental policies, and whose goal is to prevent urban sprawl. The organization echoed comments made by Downtown On the Go, the Puyallup Watershed Initiative, and the Transportation Choices Coalition including safety, access, and equity priorities. They requested more emphasis on equity in the planning process to mitigate displacement impacts, promote affordable housing near the stations, and increase transit connections to historically marginalized populations, including residents of East Tacoma.

4.2.2 South Federal Way

Route and Station Location

Over 110 comment statements were received that related to one or more specific South Federal Way station area alternatives. SF 3, SF 4B, and SF 4C received the highest number of mentions (about 35 each), with SF 2 East receiving the least (about 25). Of the comments indicating either support for or opposition to a specific alternative, SF 8, SF 9, and SF 2 West received at least 50 percent support. There was not a large difference in the number of comments supporting or opposing the alternatives in this section.

About 165 comments discussed the South Federal Way station area overall, with about 50 comments mentioning concerns about property acquisitions, about 30 mentioning traffic congestion, about 25 discussing alignment effects on TOD opportunities, and 15 mentioning alignment impacts to environmentally critical areas. Approximately 30 of the alignment-related comments in South Federal Way were made by potentially affected businesses.

Over 15 comments mentioned a preference for new alternative alignments or modifications to Level 2 alternatives in the South Federal Way station area, the majority of which focused on an alignment within the I-5 right-of-way.

Transportation

About 40 comment statements relating to the South Federal Way station area mentioned concerns about traffic and congestion impacts, focusing on existing roadway congestion along S 348th Street and Enchanted Parkway S and potential traffic impacts stemming from the TDLE. About 25 comments mentioned multimodal connections to potential station locations, highlighting concerns about nonmotorized user safety and a lack of existing safe sidewalks and
bicycle facilities, connections to existing and future transit service, and potential new crossings over I-5.

Over 25 comment statements mentioned parking and were largely focused on ensuring that future parking garage capacity at station locations can meet demand. Some of these comment statements also suggested using the existing South Federal Way Park-and-Ride operated by Metro. Additional comment statements indicated concerns about driveway and alleyway access in the South Federal Way station area.

Economic Benefits and Impacts
Approximately 25 commenters expressed interest in the potential economic, community, and TOD growth that could occur around stations. Other commenters were concerned about construction effects to access and the viability of businesses, as well as the displacement of existing business and jobs. Specific comments from businesses are described below.

Businesses and Community Groups
Several potentially impacted businesses and commercial property representatives in the South Federal Way station area submitted comments during the scoping period. Several communications were received from Ellenos Yogurt expressing opposition to alignment alternatives that would displace their business and they also had concerns regarding emergency vehicle access, truck traffic, and impacts to Hylebos Creek and its wetlands. McDonald’s Real Estate Company and the business owner of the franchise restaurant in Federal Way (who also owns the potentially impacted McDonald’s in Fife) expressed preference for alternatives SF 3, SF 8, and SF 9 because they would result in fewer impacts to the business, which is owned by a person of color, has employees of color, and offers entry-level jobs to people in the community. They also noted that potential impacts to the drive-through would constitute a full-take of the property.

Target provided comments regarding temporary and permanent impacts to its store and the Commons at Federal Way shopping center including visibility, parking, safety, and construction schedule, and expressed preference for alternatives that follow I-5 from the Federal Way Transit Center to the South Federal Way station. The property owners of the Commons at Federal Way also expressed preference for alternatives that follow I-5 to the South Federal Way station, which would minimize property impacts to the shopping center and its commercial tenants. Comments from the Commons also suggested design modifications to prioritize business operations and avoid impacts to traffic flow, parking, utility infrastructure, and potential future development.

The property owners of Belmor Park and Golf Course expressed preference for alternatives that would cross directly through the property towards the I-5 alignment, and requested a station to be added in the area. The letter noted their request to the City of Federal Way for a rezone of the property to allow for expanded mixed-use development and increased urban density for buildings up to 60 stories, which could be supported by the extension of light rail. The letter included illustrations of potential configurations for residential and commercial development, green spaces, multimodal transportation integration, and assumed location of the Link station directly on site.
Environmental Concerns

About 15 comment statements mentioned concerns about environmentally critical areas, the majority of which focused on potential impacts to Hylebos Creek and its associated wetlands. Approximately 5 comments discussed potential visual impacts stemming from the project, specifically mentioning impacted residential views and visual obstruction incurred by businesses.

4.2.3 Fife

Route and Station Locations

About 65 comment statements related to one or more specific Fife station area alternatives. This total included two letters related to the Korean Catholic Church in Fife with an attached petition signed by nearly 500 people expressing concerns for all of the Fife station placements and alignments that would be near the church.

Of the 65 comment statements, Fife 1 received the highest number of mentions (30), with Fife 4B receiving the least (about 25), but many of these were split between support and opposition. Of the comments indicating either support for or opposition to a specific alternative, only Fife 3A had more comments supporting than opposing.

Over 105 comments discussed the Fife station area overall, with about 45 comments mentioning concerns about property acquisitions, about 15 comments discussing potential economic impacts stemming from business displacements, and about 10 comments discussing alignment effects on TOD opportunities. Approximately 25 of the alignment-related comments in Fife were made by potentially affected businesses, and about 15 were made by agencies.

Approximately 5 comments mentioned a preference for new alternative alignments or modifications to Level 2 alternatives in the Fife station area, the majority of which focused on alignments within or adjacent to I-5 or SR 99 rights-of-way.

Transportation

About 15 comments relating to the Fife station area mentioned concerns about traffic and congestion impacts, focusing on existing roadway congestion along SR 99 and 54th Avenue E. Approximately 10 comment statements discussed potential benefits and impacts to the Port of Tacoma, with over 5 statements expressing specific concerns about potential delays to freight traffic traveling between the Port and I-5. About 10 comments focused on multimodal connections to the station, noting potential improvements to nonmotorized facilities around potential station locations and within the Fife City Center.

Over 10 comment statements mentioned parking, largely focusing on the potential to increase parking garage capacity at station locations and parking impacts to private businesses that could occur through alignment and station placement.

Economic Benefits and Impacts

Approximately 10 commenters expressed interest in the potential economic, community, and TOD growth that could occur around stations. Other commenters were concerned about
construction effects to the accessibility and viability of businesses, as well as the displacement of existing business and jobs. Specific comments from businesses are described below.

**Churches, Businesses, and Community Groups**

Several potentially impacted businesses and commercial property owners in the Fife station area submitted comments during the scoping period. Most of these comments expressed opposition to alternatives that would impact their businesses. The property owners for Fife Business Center, Pacific Willows Center, and PICK-QUICK Drive In preferred alternatives Fife 3A and Fife 4A because they would impact fewer businesses along Pacific Highway through Fife. Additional comments included support for the draft Purpose and Need statement, concerns regarding impacts to parking and storefront visibility, and further analysis of land acquisition costs.

Several employees of Les Schwab Tire Center submitted written comments together that expressed preference for alternatives along the south side of 15th Street (Fife 3A and Fife 4A) and opposition for those along 12th Street (Fife 1) because of impacts to businesses and traffic flow near 54th Avenue E. The McDonald’s Real Estate Company and the business owner also expressed preference for alternatives more aligned with I-5 because they would have fewer impacts to the business, which is owned by a person of color (the same individual who owns the South Federal Way restaurant). They noted the potential impacts to over 100 employees, the adverse effects of changes to parking or the drive-through, and the negative effects of a possible change in location. Poulsbo RV of Fife provided comments regarding temporary and permanent impacts to the business resulting from any of the Fife alternatives, including impacts due to loss of visibility, and suggested the potential for a property swap with the City of Fife.

St. Paul Chong Hasang Parish and the Archdiocese of Seattle are opposed to all Fife alternatives, with letters identifying direct and indirect impacts to the church and its parishioners. The Parish expressed concern for impacts related to loss of property as well as noise, safety, and traffic that could disrupt the practice of faith and activities on the church property. Additionally, the Parish is concerned about impacts to clergy housing and diminished property value. Four hundred ninety-four parishioners signed the letter submitted by the St. Paul Chong Hasang Parish.

**Environmental Concerns**

Approximately 10 comment statements discussed environmentally critical areas within the Fife station area. Comments centered on concern about constructing light rail through Fife due to geologic hazards including the potential for soil liquefaction, tsunamis, and lahars. Other comments discussed general soil quality concerns and climate change impacts to low-lying areas.

**4.2.4 East Tacoma**

**Route and Station Location**

Over 35 comment statements were related to one or more specific East Tacoma station area alternatives. ET 3A received the highest number of mentions (over 20), with ET 1 receiving the least (about 10). Of the comments indicating either support for or opposition to a specific alternative, only ET 3A and ET 3B received at least 50 percent support.
About 100 comments discussed the East Tacoma station area overall, focusing on property acquisitions and the potential to affect tribal land and displace businesses, traffic circulation impacts within the station area and concerns about vehicular station access, the ability of a station location to foster TOD and redevelopment, and potential negative effects on environmentally critical areas.

About 5 commenters suggested this station was not needed because it would be close to the Tacoma Dome Station, or that this area would be better served by a future extension of Tacoma Link.

Transportation

About 35 comment statements mentioned multimodal station access considerations within the East Tacoma station area, largely centered on the need to improve transit service and pedestrian and bicycle connections around potential station locations and to improve connections across I-5 to the residential neighborhoods of East Tacoma. Commenters noted that the current transportation network within the station area is not conducive to nonmotorized users. Over 5 comments specifically mentioned the potential for a pedestrian bridge across I-5 and about 5 comments noted that an above-grade crossing of Portland Avenue can be incorporated into station designs. Comments also highlighted the need for Americans with Disabilities Act (ADA) access improvements within the station area.

About 15 comments focused on parking within East Tacoma, highlighting concerns about the lack of a planned parking facility at the East Tacoma station and associated impacts on parking supply and demand in the vicinity. As with the Fife station area, 5 comments expressed concerns about potential impacts to Port of Tacoma freight traffic.

Economic Benefits and Impacts

Over 15 commenters expressed interest in the potential economic, community, and TOD development growth that could occur around East Tacoma station alternatives. Approximately 5 comment statements noted potential economic impacts stemming from the TDLE, including impacts to the Port of Tacoma and related businesses, and impacts to the Puyallup River as an economic resource for the Tribe.

Commissions, Businesses, and Community Groups

Several groups including City Council-appointed commissions, nonprofit organizations, and advocacy groups submitted comments about the East Tacoma station area.

The City of Tacoma Transportation Commission provided comments regarding safe and efficient pedestrian access to and from the East Tacoma station and expressed preference for either ET 3A and ET 3B. The Transportation Commission also recommended additional nonmotorized access improvements to the station, including a potential route to cross I-5.

The City of Tacoma Planning Commission provided comments expressing their preferred station and alignment alternatives moving into the EIS. The Planning Commission expressed preference for alternatives ET 3A and ET 3B, but is concerned about station accessibility from neighborhoods south of I-5, including Lower Portland Avenue Mixed-Use Center and McKinley
Hill. The Planning Commission also provided comments regarding station parking and traffic, architectural design, surrounding zoning, and expanded multimodal connections.

The Sustainable Tacoma Commission recommended prioritizing station integration of high-capacity transit (HCT) and nonmotorized modes and evaluating the project’s greenhouse gas emissions and potential impacts to the climate, as well as potential impacts to the light rail infrastructure due to future climate change. The Sustainable Tacoma Commission encouraged further study of alternatives ET 3A and ET 3B in the East Tacoma station area.

Environmental Concerns

Approximately 5 comment statements discussed environmentally critical areas within East Tacoma, primarily focusing on concern for geologic hazards including the potential for soil liquefaction, tsunamis, and lahars.

4.2.5 Tacoma Dome

Route and Station Location

About 80 comment statements related to one or more specific Tacoma Dome alternatives. TD 2 received the highest number of comments (about 45), with TD 4 West 27th Street receiving the least (about 20). Of the comments stating an opinion, over 30 expressed support for TD 2 and about 25 supported TD 3.

About 185 comments discussed the Tacoma Dome station area overall, with about 35 comments mentioning alignment effects on TOD opportunities, about 30 mentioning concerns about property acquisitions, and about 20 mentioning potential visual impacts. Several comments also mentioned the importance of being in close proximity to the Sounder Station, Tacoma Link, Amtrak, and Pierce Transit bus service to create a multimodal hub.

About 70 comments mentioned a preference for new alternatives or modifications to Level 2 alternatives in the Tacoma Dome station area, with the majority focusing on the addition of below-grade options. Approximately 35 comment statements mentioned an underground alternative in the Tacoma Dome station area, of which about 15 comments specifically mentioned a cut-and-cover alternative and about 5 mentioned including an alternative that would be constructed over the existing Sounder right-of-way. Several comments also discussed the possibility of an alignment located directly adjacent to the existing Sounder right-of-way.

Transportation

About 85 comment statements mentioned multimodal station access considerations within the Tacoma Dome station area, with the majority focusing on the desire to integrate TDLE with existing transit service within the station area, including Amtrak, Greyhound, Sounder, Tacoma Link, ST Express buses, Pierce Transit buses, and Intercity Transit buses. Commenters mentioned the hope that transfers between services would be easy to navigate, especially for those with limited mobility or those arriving to the station through nonmotorized means. Over 35 comments specifically mentioned pedestrians, highlighting the potential to create direct connections between the station and existing transit services, the Tacoma Dome, Freighthouse Square, and neighborhoods south of I-5.
About 30 comment statements mentioned parking, focusing on existing parking garage capacity, garage capacity increases, and potential parking impacts on the station area overall.

**Economic Benefits and Impacts**

Some public commenters expressed that there is potential for economic and community development in the Tacoma Dome area. Approximately 35 commenters stated that the alternative decisions made in this phase could expand or limit potential future opportunities and TOD. The multimodal connections to serve downtown Tacoma as an employment center and urban neighborhood are important for access to jobs. Other commenters noted concern for potential business displacements and economic impacts during construction.

**Commissions, Businesses, and Community Groups**

Tacoma City Council-appointed commissions, nonprofit organizations, and advocacy groups submitted comments regarding the Tacoma Dome station area.

The City of Tacoma Transportation Commission provided comments regarding safe and efficient pedestrian access to and from the Tacoma Dome station and expressed preference for TD 2 as its top choice and TD 3 as its second choice. The Transportation Commission also suggested design modifications to pedestrian routes such as limiting multiple-grade connections and vehicular conflicts and providing covered routes.

The City of Tacoma Planning Commission expressed concerns regarding the elevated station and above-grade alignment alternatives in the Tacoma Dome station area because of visual, development, and traffic impacts within the Dome District. They described a below-grade, cut-and-cover station and alignment as more appropriate for the area and strongly recommended a tunnel alternative be studied in the EIS. In addition, the Planning Commission identified the TD 4 alignment and station as a candidate for a cut-and-cover alternative. They also described an “over Sounder tracks” alternative for an elevated alignment and station. Further, they identified TD 2 for an elevated station, and they also suggested the possibility of a station between the TD 2 and TD 3 alternatives. The Planning Commission recommended consideration of future expansion, such as to the Tacoma Mall, when siting the TDLE facility.

Other comments discussed station parking and architectural design, multimodal connections, property acquisition, and visual impacts.

The Sustainable Tacoma Commission recommended prioritizing station integration of HCT and nonmotorized modes and evaluating the project’s greenhouse gas emissions and potential impacts to the climate, as well as potential impacts to the light rail infrastructure due to future climate change. The Sustainable Tacoma Commission encouraged further study of alternatives TD 2 and TD 4 East In-Street in the Tacoma Dome station area.

The Dome Business District provided comments regarding the Tacoma Dome station design and expressed their opposition to an elevated station and track because it would displace residents and businesses in new mixed-use buildings. In order to be more consistent with current and future TOD planning efforts, they suggested that Sound Transit study underground, below-grade, or cut-and-cover station designs in the EIS, including an underground version of each station, or an elevated track over the existing Sounder/Amtrak tracks. The Dome Business
District also expressed concern regarding visual impacts and pedestrian safety, and requested further analysis of traffic impacts and future transportation expansion in the EIS.

The New Tacoma Neighborhood Council expressed concerns regarding the elevated tracks and station options in the Dome District and recommended adding an underground option for alternatives TD 2, TD 3, and TD 4 East In-Street for analysis in the EIS. The letter also listed several impacts due to elevated tracks that should be further studied in the EIS, including lower property values, business displacements, creation of unbuildable lots, loss of urban street vitality, and potential for increased crime.

Historic Tacoma expressed opposition to the elevated alternatives in the Tacoma Dome station area because of impacts to TOD in the Dome District. Historic Tacoma also recommended an underground station to encourage development and prevent demolition of usable buildings or historic structures.

The Foss Waterway Development Authority expressed opposition to the elevated station and alignment alternatives in the Dome District because of the detrimental impacts they would have to the neighborhood, including businesses and residents. To support future development in this area, the Foss Waterway Development Authority recommended evaluating an underground alternative in the EIS.

Environmental Concerns

A few comments related to the natural and built environment were received regarding the Tacoma Dome area. These comments related primarily to visual concerns of an elevated structure and station. Other built environment concerns included potential impacts to historic structures and air quality. The Sustainable Tacoma Commission recommended prioritizing station integration of HCT and nonmotorized modes and evaluating the project’s greenhouse gas emissions and potential impacts to the climate, as well as potential impacts to the light rail infrastructure due to future climate change.
Exhibit 4  Potential Alternatives being Considered in South Federal Way
Exhibit 5  Potential Alternatives being Considered in Fife
Exhibit 6   Potential Alternatives being Considered in East Tacoma and Tacoma
5 NEXT STEPS

The FTA and Sound Transit are using the information received during scoping, as well other planning information developed to date, to determine the range of alternatives to study in an EIS beginning in summer 2019. The Sound Transit Board (Board) may identify a Preferred Alternative at that time. The Board meetings allow public comment on items on the agenda, and Sound Transit provides meeting agendas and related materials prior to each Board meeting. This would include any staff reports, presentations, or motions involving the TDLE project.

Project Timeline and Process

Once the Board identifies the alternatives to be evaluated, the next steps in the process include:

- **Preparing and issuing a Draft EIS** – Work on the Draft EIS is anticipated to start in summer 2019. Sound Transit will evaluate the Preferred Alternative and other alternatives in the Draft EIS. The FTA and Sound Transit will publish the Draft EIS with a public review and comment period of at least 45 days, including public meetings and a public hearing.

- **Preparing a Final EIS** – The FTA and Sound Transit will consider comments and the Draft EIS findings. The Board will confirm or modify the Preferred Alternative following the evaluation of public comments on the Draft EIS and develop a Final EIS. The Final EIS will update the environmental information for the Preferred Alternative and other alternatives; respond to public, agency, and tribal comments on the Draft EIS; and further define measures to avoid, minimize, or mitigate potential project impacts.

- **Obtaining environmental approvals and commencing final design, construction, and operation** – After the Final EIS is published, the Board will select the project to be built. The FTA will then issue a federal Record of Decision (ROD) that describes the environmental findings and mitigation commitments. Following these actions, the project will advance into final design, permitting, construction, and operation.

Exhibit 7 shows the general project timeline.
6 SUPPORTING DOCUMENTATION AND REFERENCES


soundtransit.org/tdlink

tdlink@soundtransit.org
206-903-7118