



Operations and Maintenance Facility South

Scoping Summary Report

May 2019

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Appendices are available on Sound Transit’s website at: soundtransit.org/omfs.

Acronyms and Abbreviations

DEIS	draft environmental impact statement
Ecology	Washington State Department of Ecology
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
FEIS	final environmental impact statement
FWLE	Federal Way Link Extension
I-5	Interstate 5
OMF	operations and maintenance facility
OMF South	Operations and Maintenance Facility South
NPDES	National Pollutant Discharge Elimination System
SEPA	State Environmental Policy Act
Sound Transit	Central Puget Sound Regional Transit Authority
SPU	Seattle Public Utilities
SR	State Route
ST2	Sound Transit 2
ST3	Sound Transit 3
TDLE	Tacoma Dome Link Extension
TOD	transit oriented development
WAC	Washington Administrative Code
WSDOT	Washington State Department of Transportation

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1 INTRODUCTION

1.1 Purpose of this Report

The Central Puget Sound Regional Transit Authority (Sound Transit) requested public comments as part of environmental scoping for the Operations and Maintenance Facility South (OMF South) project. The comment period was from February 19 through April 1, 2019. Scoping was conducted under the Washington State Environmental Policy Act (SEPA), per Washington Administrative Code (WAC) 197-11-410. Sound Transit is the lead agency under SEPA.

The scoping process helps Sound Transit identify and consider potential alternatives and effects on the environment to be studied in the environmental impact statement (EIS). The build alternatives being considered for the OMF South include sites in Kent, Federal Way, and an unincorporated area in King County. **Figure 1-1** shows the project area and the general location of the potential site alternatives. This report describes the scoping process and summarizes the comments received from agencies, tribes, and the public. **Appendices A through F** provide supplementary information on the project, the scoping process, public outreach, and the comments received.

1.2 Background

Sound Transit was created to build a regional mass transit system connecting the urban centers of King, Pierce, and Snohomish counties. In 1996, voters approved Sound Move, the first phase of investment in the mass transit system, which includes regional express buses, commuter rail, and light rail (Sound Transit 1996). Sound Transit began operating the first phase of the Link light rail system with the line from downtown Seattle south to SeaTac in 2009.

When voters approved the Sound Transit 2 (ST2) Plan in 2008, the second phase of investment in the region's mass transit system began (Sound Transit 2008). The plan added regional express bus and commuter rail service while building 36 additional miles of light rail to form a 55-mile regional system. The ST2 Plan extends light rail south to Federal Way, east to Redmond, and north to Lynnwood.

Voters approved the third phase of investment, the Sound Transit 3 (ST3) Plan, in 2016 (Sound Transit 2016). In addition to bus, bus rapid transit, and commuter rail service expansion, the ST3 Plan adds 62 new miles of light rail for a regional system reaching 116 miles. ST3 extends light rail from Federal Way to Tacoma, as well as to Everett, South Kirkland, Issaquah, downtown Redmond, and the Seattle neighborhoods of West Seattle and Ballard. **Figure 1-2** shows the regional transit system map.

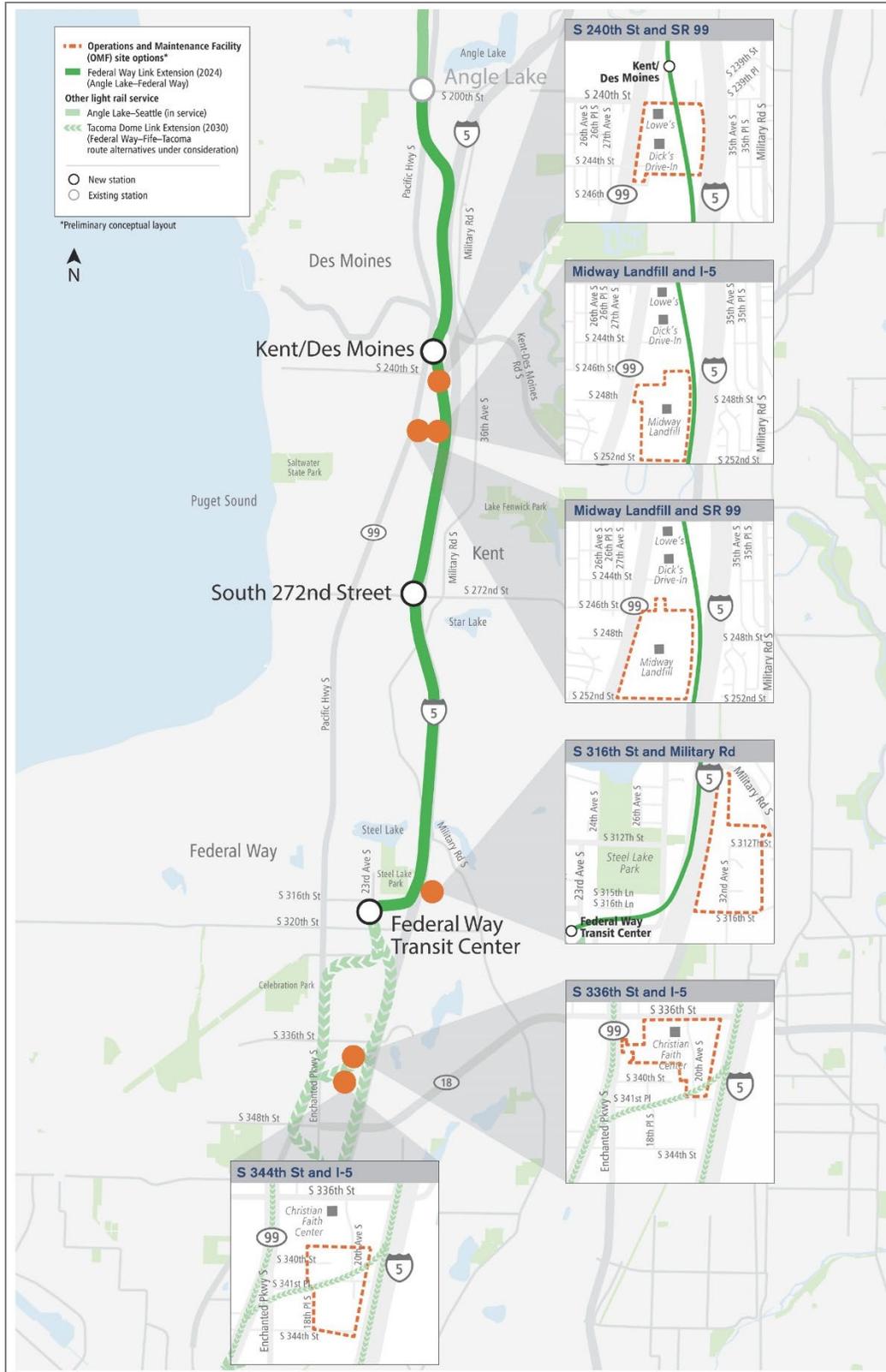


Figure 1-1 OMF South Project Area and Potential Alternatives



Figure 1-2 Sound Transit Regional System Map

1.3 Project Description for OMF South

To expand its light rail system as called for in ST3, Sound Transit needs additional facilities to store, maintain, and deploy a larger fleet of light rail vehicles. Sound Transit has an existing operations and maintenance facility (OMF) at South Forest Street in Seattle and is building a second facility in Bellevue. Two additional OMFs, one in the North Corridor and one in the South Corridor, are needed as the system-wide fleet expands to more than 400 total light rail vehicles. These vehicles are needed to serve the 62-mile expansion of light rail and the future growth in ridership system-wide.

The site for the proposed OMF South needs to have the capacity to store and maintain potentially over 140 light rail vehicles. The OMF would contain light rail storage tracks as well as buildings, parking, storage areas, internal roads, landscaping, fencing, setbacks, stormwater facilities, electric transmission lines, and other utilities. The OMF also includes a 5-acre area for maintenance and yard storage, which includes vehicles, equipment, and a 30,000-square-foot building. The OMF requires tracks connecting to the light rail line that will be operating by 2026, which in southern King County is the Federal Way Link Extension (FWLE). The length and location of these connecting tracks varies by alternative. The preliminary layout for the proposed OMF South results in about 40 to 50 acres when the OMF facilities, 5-acre storage area, and lead tracks are taken into account.

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 draft Purpose and Need statement, potential alternatives, and environmental resources to evaluate in the EIS. Scoping supports the project's overall planning, public involvement, and environmental regulatory processes.

The OMF South project initially underwent early scoping under SEPA along with the Tacoma Dome Link Extension (TDLE) project in spring 2018. As they move forward, the two separate projects are each conducting scoping as part of their independent EIS processes.

Sound Transit has concluded that the OMF South project has the potential to result in significant environmental effects and an EIS is needed, as required by SEPA. Various alternatives to develop an OMF in the South Corridor are being considered for evaluation in the EIS. The OMF South 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 SEPA register.

2.2 Opportunities to Comment

The comment period for scoping was from February 19 through April 1, 2019. During this time, several open public meetings helped to inform and obtain input from agencies, tribes, and the public.

Two community open houses (public meetings) were conducted (see Section 3.2), and an online open house was available for the duration of the comment period (see Section 3.4).

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

- Online Comment Form: OMFSouth.participate.online
- Email: OMFSouthScoping@soundtransit.org
- Phone Message: (206) 398-5453
- Mail: Sound Transit, OMF South Project
c/o Hussein Rehmat, Environmental Planner
401 S Jackson Street, Seattle, WA 98104
- Public Scoping Meetings: Written comment forms were available to fill out, and computers were available to access the online comment form. A court reporter was also available to record spoken statements.

2.3 Summary of Participation

During the scoping period:

Tribal, agency, and jurisdiction participation

- Approximately 20 representatives attended the Agency Scoping Meeting the afternoon of March 12, 2019.

- The Puyallup Tribe of Indians, Muckleshoot Indian Tribe, and members of several local government agencies attended community open houses.
- The Puyallup Tribe of Indians, the Muckleshoot Indian Tribe, and nine cities and other agencies submitted comment letters.

Public participation

- More than 370 people attended the two community open houses in Federal Way and Kent.
- Over 3,400 people participated in the online open house.
- Over 1,400 written communications were received with approximately 2,500 comment statements.
- More than 950 social media user clicks and engagements were recorded on Sound Transit's Facebook and Twitter pages.
- Posters were placed in over 300 different locations throughout the project area between Kent and Tacoma.
- More than 74,500 mailers were sent to homes, apartments, and businesses in Kent, Des Moines, Federal Way, Fife, Milton, and Tacoma.
- One news release and three update notices were sent to approximately 6,200 email list subscribers.
- Display advertisements and online community calendar postings (**Appendix C**) were placed in 10 local online and print publications, and promoted posts were placed on Facebook for zip codes in the project area.
- Several posts were included on Sound Transit's Facebook page (30,047 subscribers) and Twitter account (81,500 followers).
- Nine presentations/briefings were provided to cities and community organizations in the project area.
- Door-to-door outreach was conducted during four field visits, reaching over 20 businesses to alert potential large parcel owners, business operators, and/or tenants to the opportunity for public involvement and to promote awareness of the project.



3 SCOPING MEETINGS AND OUTREACH

Public scoping notices and information about the project were published before scoping started, using a variety of media and other public information tools. This includes direct mailings, advertisements, and notices on the project website and Sound Transit's social media platforms, as well as email updates to the project's GovDelivery list serve. Additionally, emails were sent to stakeholders representing social service agencies and community groups to allow information to be shared to their networks. Posters were distributed to local businesses and community organizations along the project corridor.

A scoping notice for the EIS was published in the SEPA register (see **Appendix A**, SEPA Register Notice). Links to the notice were also on the project's website.

3.1 Tribe, Agency, and Jurisdiction Scoping Meeting

3.1.1 Notification

A scoping meeting to present project information and receive comments was held on March 12, 2019 from 1:00 to 2:30 p.m. at the Federal Way Performing Arts and Event Center, 31510 Pete Von Reichbauer Way South. Sound Transit sent notices for the meeting by email to representatives of the following tribes, agencies, and jurisdictions. Those that attended the scoping 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

- Federal Aviation Administration, Northwest Mountain Region
- Federal Highway Administration, Washington State Division
- Federal Transit Administration, Region 10
- U.S. Bureau of Indian Affairs, Northwest Region*
- U.S. Environmental Protection Agency (EPA), Region 10

State Agencies

- Washington State Department of Archaeology and Historic Preservation*
- Washington State Department of Natural Resources
- Washington State Department of Ecology (Ecology)
- Washington Department of Fish and Wildlife*
- Washington State Department of Transportation (WSDOT)*

Regional and Local Agencies

- City of Des Moines*
- City of Federal Way*
- City of Fife
- City of Kent*
- City of Milton
- City of Tacoma
- King County Metro Transit
- Pierce County
- Pierce Transit
- Port of Tacoma
- Puget Sound Clean Air Agency
- Puget Sound Regional Council
- Seattle Public Utilities
- South King Fire and Rescue

Other Entities Having Jurisdiction

The following other entities with jurisdiction in the South Corridor were invited to participate in early scoping:

- Bonneville Power Administration
- Highline Water District*
- Lakehaven Sewer and Water District*

3.1.2 Scoping Meeting

An overview presentation was provided for project context and to describe the SEPA process. The project team then answered questions from the agencies and jurisdictions. Materials showing the draft Purpose and Need statement, potential OMF South site options (including maps and technical details), and information about the process and timeline were displayed during the meeting.

3.2 Community Open Houses

The comment period for scoping was held from February 19 through April 1, 2019, with two community open houses (public meetings) to help inform and obtain input from the community:

- **Federal Way Performing Arts and Event Center**
March 12, 2019, 6:00–8:00 p.m.
31510 Pete von Reichbauer Way S, Federal Way, WA 98003
- **Highline College**
March 20, 2019, 6:00–8:00 p.m.
2400 S 240th St, Des Moines, WA 98198

More than 370 people attended these meetings.

3.2.1 Open House Notification

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

- Mailers to over 74,500 households and businesses, including both owners and renters
- Online and print advertisements in 10 publications (listed in **Table 3-1**)
- Posters at 301 locations in the corridor
- One news release and three email update notices
- Social media posts
- Project website

Table 3-1 Online and Print Display Advertisements

Publication	Format and Run Dates
Federal Way Mirror	Print: March 8 and 15 Online: February 20–April 1
Kent Reporter	Print: March 8 and 15 Online: February 20–April 1
Korea Daily	Print: March 11 and 18
Seattle Times	Print: March 10 and 17 Online: February 20–March 21
Tacoma News Tribune	Print: March 11 and 18 Online: March 1–22
iLoveKent	Online: February 20–March 21
Waterland Blog	Online: February 20–March 21
B-Town Blog	Online: February 20–March 21
Tu Decides	Online: March 8 and 15
Westside Seattle	Online: February 20–April 1

3.2.2 Open House Format

The open houses presented display materials showing the draft Purpose and Need statement, potential OMF South site options (including maps and technical details), and information about the process and timeline. An overview presentation was provided for project context.

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 and a court reporter was available to record spoken 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 low-income, minority, 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 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 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

As the project moves forward, Sound Transit will continue to engage community leaders, jurisdictions, and social service providers to seek input, assess outreach methods, and identify additional ways to reach low-income, minority, and limited-English-proficiency populations.

3.4 Online Open House

An online open house was available at <https://omfsouth.participate.online/> during the scoping period to inform the public about the project and provide an opportunity to receive feedback using social media tools. All materials presented at the open house were posted on the online open house (**Figure 3-1**). A video embedded within the online open house demonstrated the site selection process, offering audio accessibility of content for English language learners, as well as English and in-language subtitles for hearing-impaired users.

Between February 19 and April 1, 2019, over 3,400 visitors accessed the online open house. Visitors were given the opportunity to comment on the project's draft Purpose and Need statement, potential benefits and impacts, and alternative site locations using the embedded electronic comment forms.

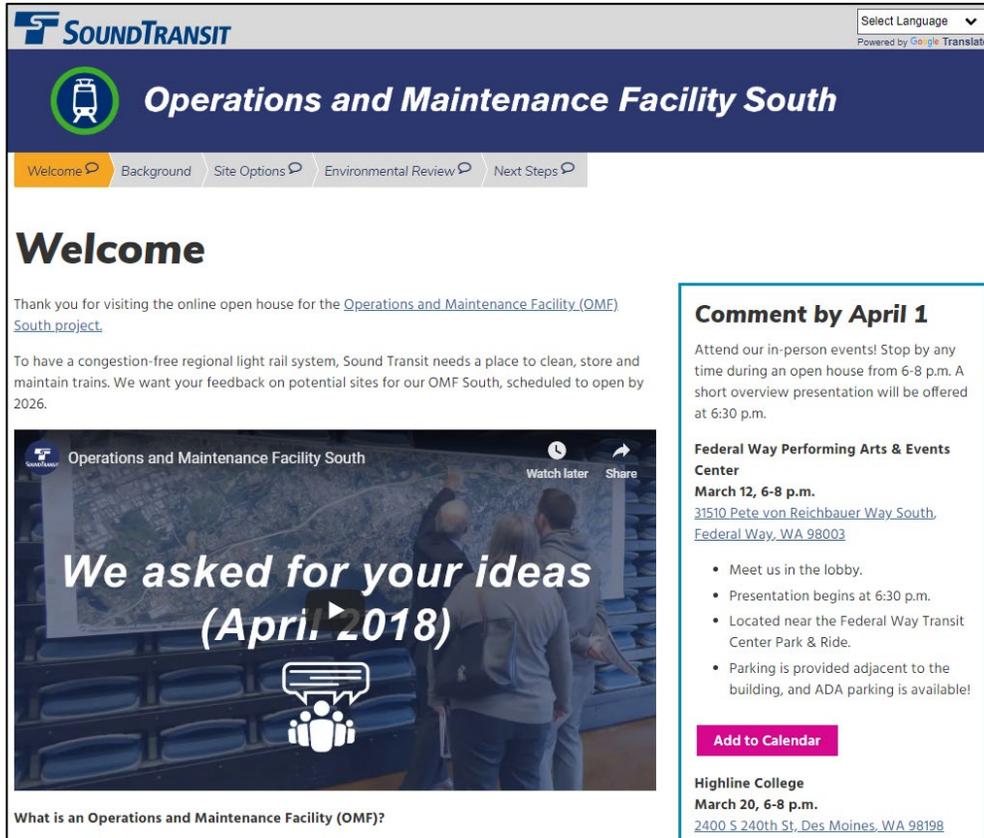


Figure 3-1 Online Open House Screen

Users could offer generalized comments about the project or indicate the specific site(s) they wanted to comment on. They then could offer comments or suggest a new site idea or alternative.

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4 COMMENT SUMMARY

This section summarizes the comments Sound Transit received during scoping. **Appendix D**, Scoping Comments from Tribes, Agencies, and Elected Officials, includes the full letters received from each entity. **Appendix E**, Public Scoping Comments, includes the public emails, letters, comment forms, online notes, and information received during the scoping period.

Appendix F, Comments Received Prior to Scoping Period, includes all comments received between late January and early February 2019, before the official start of the scoping period on February 19, 2019. These comments are summarized in Section 4.3.

Sound Transit asked for comments on:

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

Sound Transit received 728 emails, 476 online open house communications, 179 in-person communications, 47 voicemail messages, and 20 letters. Within these 1,450 communications, approximately 2,500 comment statements were made.



4.1 Summary of Comments from Tribes, Agencies, and Elected Officials

Twelve scoping comment letters were received from two tribal governments (Puyallup Tribe of Indians and Muckleshoot Indian Tribe), three cities (Des Moines, Federal Way, and Kent), four agencies (WSDOT, King County Metro, Federal Way School District, Seattle Public Utilities), and one local elected official (King County Councilmember Dave Upthegrove).

No federal agencies made formal scoping comments.

4.1.1 Tribes

Puyallup Tribe of Indians

The Puyallup Tribe comments noted that all the sites being considered are within the ancestral lands of the Puyallup people, and that the Tribe's Historic Preservation Office looked forward to the Consultation process.

Muckleshoot Indian Tribe

The Muckleshoot Tribe wrote that many streams in the project area are currently piped and asked that the EIS consider them. The Tribe asked that Sound Transit avoid stream impacts, do nothing that would preclude the ability to restore fish passage to habitats upstream, and avoid any actions that could complicate future culvert replacement projects.

The Tribe requested two copies of the Draft EIS (DEIS)—one for the Fishery Division and one for the Tribal chair.

4.1.2 State Agencies

Washington State Department of Transportation

WSDOT wrote to express support for the OMF South project as a part of the regional light rail system, stating that the project aligns with the agency's vision of providing a sustainable and multimodal transportation system.

WSDOT stated that the agency will work with Sound Transit to find the best solution, but noted that sites on the east side of Interstate 5 (I-5) would require bridge construction and they prefer not to add crossings over the interstate. If the crossings are necessary, WSDOT asked that Sound Transit identify a bridge type and construction methods that would minimize impacts to traffic control and future maintenance.

4.1.3 Regional and Local Agencies

City of Des Moines

The City of Des Moines requested that the DEIS evaluate:

- The consistency of the alternative sites with Sound Transit's transit oriented development (TOD) policies.
- The consistency of the alternative sites with both Des Moines' and Kent's Comprehensive Plans and zoning.
- The impact on Highline College's City-approved Comprehensive Long-Range Development Plan and campus operations.
- The impacts on future commercial and mixed-use redevelopment of the State Route (SR) 99 corridor south of Kent Des Moines Road.
- The property and sales tax base impacts on municipal services.
- The impacts on "neighborhood convenience" of retail businesses along the corridor.
- The cumulative impacts on the level of service of the SR 99/Kent Des Moines Road intersection and SR 99 performance with SR 509 improvements, light rail station operations, and OMF South operations.

The City also suggested adding the Weyerhaeuser site back into the analysis, stating that the reasons for its elimination during the Alternatives Analysis process were not clear.

City of Federal Way (Office of the City Council)

The Office of the City Council stated a preference for the OMF South to be located at the Midway Landfill. Noting that it would potentially be more expensive to develop, the City Council believes this site would have overall fewer impacts on the community.

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 advanced for study in the OMF South Alternatives Evaluation Technical Memorandum (Sound Transit 2019a), specifically for the following sites: S 316th St and Military Rd, S 336th St and I-5, and S 344th St and I-5.

They wrote that the S 316th St and Military Rd site is within the City's Potential Annexation Area. Potential issues associated with the site include necessary roadway improvements and a planned regional multi-use trail. The City directors also recommend that Sound Transit verify the location of the Olympic pipeline.

Issues with the S 336th St and I-5 site and the S 344th St and I-5 site include the need to preserve emergency access along 20th Avenue S and mitigate impacts to adjacent residential properties. The City directors questioned whether these sites can be adequately evaluated considering they would access the light rail system via the proposed TDLE project, which is in the same stage of planning and environmental review. They noted that the Christian Faith Center has a Development Agreement with the City, and asked for the EIS to study the project's impacts on community services provided by the center.

Additional comments included the following:

- The City directors questioned the methodology and ratings for the economic, streets/roads, and wetlands and streams criteria in the OMF South Alternatives Evaluation Technical Memorandum (Sound Transit 2019a).
- The directors advised Sound Transit about upcoming changes to the National Pollutant Discharge Elimination System (NPDES) Stormwater Permit and anticipated implications they will have on light rail permitting efforts.
- The directors asked Sound Transit to coordinate with the City of Federal Way Police Department and asked how emergency calls at the facility would be handled, noting that the police department is already understaffed.

City of Kent (March 7, 2019)

The City of Kent requested that the S 240th St and SR 99 site (referred to as the Dick's Drive-In site) be removed from consideration. Specifically, the City expressed that this site violates the Sound Transit Board's TOD policies by:

- Not providing a separate criterion to address TOD issues in the alternative site evaluation.
- Discouraging residential, commercial, and employment growth near a high-capacity transit station.

- Discouraging ridership and encouraging automobile-based transportation.
- Disregarding local, regional, and state growth plans, policies, and strategies by ignoring the Midway Subarea Plan developed by Kent and Des Moines.
- Fostering inequality by limiting social and economic opportunity for current and future residents.
- Displacing existing businesses within the TOD area, including Dick's Drive In and Lowe's, which the City identified as being of high economic importance.

The letter stated that Kent welcomes the construction of the OMF South facility within its limits if one of the Midway Landfill alternatives is chosen. The City contended that the cost estimates used in the OMF South Alternatives Evaluation Technical Memorandum (Sound Transit 2019a) may have been inflated to make the Midway Landfill sites seem less desirable.

City of Kent (March 29, 2019)

The City of Kent provided a second comment letter providing more information on its request for Sound Transit to remove the S 240th St and SR 99 site from further consideration. The letter also expanded on the reasons for its preference for the Midway Landfill and I-5 site.

The City recommended adding another bullet point to the Purpose and Need statement to acknowledge the need to support and implement the policies and goals of its regional and local partners.

The City questioned in detail the ratings of alternatives in the OMF South Alternatives Evaluation Technical Memorandum (Sound Transit 2019a). The City listed several criteria that it believes were incorrectly applied, and identified other criteria that were not considered but should have been. As an example, the City believes that the scoring for the S 240th St and SR 99 site was subjective and did not consider the potential for TOD. An example of a criterion that was not used but should have been is how the sites meet the goals of adopted local land use plans.

The City's letter also discussed technical issues involving the Midway Landfill. The City stated it has been researching site conditions as well as examples from other projects that are being constructed on former landfill sites. The City stated that the Midway Landfill and I-5 site is viable and should continue to be evaluated in the DEIS.

The City closed its letter with an extensive analysis of applicable local and regional plans and policies, concluding that the S 240th St and SR 99 site does not meet the stated goals and policies of these plans. The list of plans cited by the City includes:

- Puget Sound Regional Council, Vision 2040
- Puget Sound Regional Council, Transportation 2040
- The Regional Transportation Plan (2018)
- Sound Transit 3: The Regional Transit System Plan

- Midway Subarea Plan – City of Kent
- Growing Transit Communities
- Sound Transit TOD Strategic Plan
- Sound Transit TOD Policy Update – Staff Report to Resolution R2018-10
- Sound Transit Equitable TOD Policy Resolution R2018-10

The City also analyzed past studies and communications that it believes support the contention that the S 240th St and SR 99 site is not suitable for the OMF South. These documents include:

- Sound Transit Federal Way Link Extension Transit Oriented Development Study Addendum
- Term Sheet between City of Kent and Sound Transit Regarding FWLE Kent/Des Moines and Star Lake (S 272nd) stations
- FWLE DEIS Comment Letter from City of Kent to Sound Transit

Federal Way Public Schools

The Federal Way school district asked that Sound Transit build the OMF South on one of the Midway Landfill sites to lessen community impacts, including those to residents, businesses, and faith-based organizations. The District noted that its students draw from a diverse community with 60 percent qualifying for a free or reduced fee lunch and 20 percent who are learning English as a second language. The District asked Sound Transit to consider the impacts to these families in its analysis.

King County Metro

King County Metro recommended that Sound Transit include a discussion in the DEIS of the coordination between the OMF South and the FWLE projects. King County Metro also suggested that the DEIS evaluate the impacts of both projects, along with other projects in the area, and include a discussion of cumulative impacts. Specifically, King County Metro suggested a discussion of the ability of affected jurisdictions to review, permit, and conduct construction inspections.

Seattle Public Utilities

Seattle Public Utilities (SPU) encouraged Sound Transit to continue to consider the Midway Landfill as a potential site. SPU indicated the site could likely be redeveloped and restored to productive use without compromising the remediation or worker safety. The letter had attachments with supporting information including EPA's 2007 Landfill Reuse Report, EPA's Record of Decision for the Midway Landfill, and the 2015 EPA 5-Year Review of the Midway Landfill.

SPU offered other information regarding the landfill, noting the west edge of the landfill has a relatively shallow layer of waste and could be less prone to settlement, which could make it a good location for the maintenance structure. SPU stated that it is working with EPA, WSDOT, and Sound Transit on a project expanding I-5 into the right-of-way shoulder next to the Midway Landfill. This project will involve removing refuse under the shoulder. The agencies should coordinate efforts.

SPU cited WAC 173-350 Solid Waste Handling Standards, which the letter said would allow any municipal solid waste removed from the Midway Landfill to be disposed of as municipal solid waste at another disposal site. SPU noted that as the closed landfill has aged, the rates of settlement have slowed. SPU offered to share studies with Sound Transit, including work underway for the development of new facilities on the South Park landfill, which is at the 60 percent design level.

The utility offered to work with Sound Transit to further evaluate the engineering feasibility of the site. SPU suggested an intensive workshop (Facilitated Technical Design Charette) with participants including technical staff from Sound Transit, Ecology, EPA, the City of Kent, and SPU to develop solutions to the site challenges.

4.1.4 Elected Officials

King County Metropolitan Councilmember Dave Upthegrove (District 5)

Councilmember Upthegrove requested that the S 240th St and SR 99 site be removed from consideration. He believes that development of the site as an OMF would preclude a “rare opportunity” to improve the economy and quality of life in the area through TOD. He noted that the mobile home park on the site provides affordable housing for thirty families, and wrote that affordable housing is becoming increasingly difficult to find in the area. He also argued that keeping the site under consideration through the EIS process would delay development opportunities by introducing uncertainty. Finally, he stated that his constituents do not want the facility at that site.

4.2 Summary of Public Comments

Over 1,438 communications were submitted by the general public during the OMF South scoping period, including 10 communications submitted by potentially impacted businesses and three communications submitted by community groups and business associations.

Approximately 2,400 comment statements were made within the 1,438 public communications. The following subsections summarize these comments. General or project-wide comment topics are shown first, followed by comments about specific OMF South alternatives. The full set of public comments received during scoping is in **Appendix E**, Public Scoping Comments.

Additional comments that were received prior to the formal scoping period are summarized in Section 4.3 and can be found in **Appendix F**, Comments Received Prior to Scoping Period.

4.2.1 General or Project-wide Comments

The most common general themes in the public comments were:

Site Opinions

About 1,180 commenters expressed a preference for a specific site. A majority of the comments concerned the S 240th St and SR 99 site (Dick's Drive-In). Many of those commenters preferred one, both, or either of the Midway Landfill sites and asked Sound Transit to remove the S 240th St and SR 99 site from further consideration.

Property Acquisition

About 385 comments were related to potential property acquisition and displacements, with about 235 comments concerning the displacement of existing businesses, and about 155 comments on residential displacements. There were several comments related to the Midway Landfill. Some commenters were also concerned about potentially relocated property owners and their compensation.

Economic Impacts

About 185 comments mentioned employment, business, or economic-related impacts. Several comments expressed concern about business and job displacements, the relative cost of OMF site alternatives, and impacts to planned economic growth in the South Sound. About 40 comments were concerned with potential impacts to low-income populations and displacement of affordable housing, including the Midway Mobile Home Park. Additionally, some potentially impacted businesses submitted comments concerning financial hardships that might occur if they were relocated.

Neighborhood and Community Impacts

About 360 comments were related to neighborhood and community impacts such as zoning consistency, TOD, and overall impacts to neighborhood character. Several commenters were concerned that business displacements and the addition of an industrial facility would negatively impact the community, which has experienced increased growth and commercial development in preparation for the light rail extension. Nearly 90 comments mentioned TOD, most in reference to the half-mile walkshed surrounding the future Kent/Des Moines Station.

General Project Support and Concerns

Several comments were related to project design, budget and funding, the draft Purpose and Need statement, and community outreach. In general, most commenters supported the project as a necessary component of light rail expansion into South King County.

- Project design – About 45 comments were related to design, including concerns about crossing I-5, size considerations for future expansion, and potential site-specific design modifications.
- Budget/funding – About 25 comments were related to ST3 funding, including taxes and car tabs.

- Purpose and Need statement – About 20 comments were related to the EIS Purpose and Need statement. Some commenters mentioned that the Purpose and Need statement should be rewritten to encompass impacts to existing structures and financial burdens placed on local jurisdictions.
- Community outreach – About 50 comments were related to community outreach. Many commenters expressed appreciation for Sound Transit’s community outreach, including through the use of digital platforms such as the online open house. Some commenters mentioned the need for Sound Transit to respect public opinion when choosing a site and to interact with South King County residents more.

General Environmental Concerns

Almost 80 comments expressed concern for wetland and water resources, environmentally critical areas, and hazardous materials (including the complications associated with building on a Superfund site). Several commenters mentioned wetlands, especially those associated with Hylebos Creek, and the need to protect them from industrial contamination. An additional 19 comments were related to other environmental impacts including visual aesthetics, noise/vibration, parks/open space, energy use/utilities, and archaeology.

Transportation Impacts

Over 50 comments mentioned transportation impacts, including traffic and site access. Commenters were concerned about increased traffic during project construction for each of the OMF South alternatives. Several commenters specifically mentioned traffic concerns on SR 99 and how it would impact businesses and other establishments such as Highline College.

Other Alternatives

About 40 comments suggested alternatives other than those listed as part of scoping. Some of these suggestions are OMF South locations that were previously screened out and some are new potential locations.

Comments on OMF South site locations that were previously screened out included:

- Weyerhaeuser – About 10 comments suggested the Weyerhaeuser property as a site location or questioned why it was removed from the screening process before scoping. The OMF South Alternatives Evaluation Technical Memorandum (Sound Transit 2019a) contains additional information about alternatives that were screened out prior to scoping.
- South of Federal Way – Six comments suggested potential sites on vacant land at the Fife curve or within Fife and Tacoma industrial areas, citing the need for a maintenance facility that can be used by the southerly expansion of light rail. The OMF South Alternatives Evaluation Technical Memorandum (Sound Transit 2019a) contains more information about alternatives that were screened out prior to scoping.

New OMF South site suggestions included:

- Kent/Des Moines area – Commenters suggested the closed landfill east of I-5 on Kent Des Moines Road, the area along I-5 in Des Moines where the Silverwood Park Apartments are currently located, and land towards the Kent Valley.
- Vacant land along Pacific Highway – Commenters suggested specific locations including a large wetland complex between I-5/SR 99 and S 260th St/S 272nd St in Kent, a vacant parcel on SR 99 across from Fred Meyer in Kent, and another wetland area between Todd Beamer High School and SR 99 in Federal Way.
- Additional suggestions included the Commons at Federal Way, the BNSF Auburn Yard, an area south of SeaTac near the Angle Lake light rail station, and nonspecific vacant or government-owned properties in South King County.

Additionally, 10 commenters suggested design modifications to existing site alternatives, including the S 240th St and SR 99 site, the Midway Landfill sites, and the S 316th and Military Rd site, which are discussed in the following sections specific to each alternative.

Geographic Location of Commenters

About 10 percent of commenters mentioned where they live, and the majority were from areas surrounding the OMF South alternatives. Locations mentioned by commenters and the approximate count of each include: Kent (35), Des Moines (35), Federal Way (30), Auburn (10), and South King County (40). Comments were also received from residents of Bellevue, Burien, Clyde Hill, Kirkland, Maple Valley, Redmond, Renton, Sammamish, Seattle, Star Lake, Sumner, Tacoma, Whidbey Island, and Yakima, as well as Kitsap County, Pierce County, and Thurston County.

Comments Not Related to OMF South

About 45 comments were not clearly related to the OMF South project, commenting instead on station locations and parking, light rail routes, and ridership. Some commenters referred to the OMF South project as a light rail station, transit center, or temporary staging area.

4.2.2 S 240th St and SR 99

About 950 comments were related to the S 240th St and SR 99 site. Of those stating an opinion, 25 supported the site and 865 opposed the site. Major themes for comments in support of this site were related to cost-effectiveness and fewer impacts to wetlands and other environmentally critical areas. Major themes for comments opposed to this site were related to property acquisition and relocation, and neighborhood impacts. Potentially impacted businesses, including City Pacific Land Co. and Gresham Transfer, Inc., as well as representatives for entities such as Dick's Drive-In, Lowe's, Midway Mobile Home Park, and Gaurdian Capital Management submitted comments expressing opposition to the S 240th St and SR 99 alternative.

A majority of comments for this alternative concerned potential business displacements in the Midway Shopping Center, including Dick's Drive-In, Lowe's, Starbucks, and Domino's.

- About 730 comments mentioned Dick's Drive-In. Several commenters questioned why Sound Transit did not warn Dick's Drive-In while it was being permitted and built that they were considering the site as an OMF South alternative.
- About 355 comments mentioned the Lowe's home improvement store. Many commenters mentioned that Lowe's is the only home improvement store in the area and displacing it would require residents to travel farther to a different store.
- About 155 additional comments concerned the Midway Shopping Center, including Starbucks and Domino's.

Three community groups and business associations, including the Kent Downtown Partnership, the Washington Retail Association, and the West Hill Cambridge Neighborhood Council submitted comments that expressed concerns related to business and job displacements in the Midway Shopping Center area. Two of the three groups also expressed support for the Midway Landfill alternatives.

Several comments regarding the displacement of Dick's Drive-In also mentioned recent neighborhood improvements in the Midway area resulting from the planned Kent/Des Moines light rail station. Commenters mentioned that the area surrounding this alternative is zoned for pedestrian-friendly TOD and that an industrial facility would not fit the City of Kent's vision for the area. Additionally, some commenters were specifically concerned about increased traffic on SR 99 as a result of this alternative. Commenters were concerned about impacts to nearby small businesses and affordable housing, including the Midway Mobile Home Park, and how their removal would affect low-income populations. About 150 comments concerned impacts to Highline College and its students, and about 20 comments involved the displacement of the mobile home park.

Six comments suggested design modifications to the S 240th St and SR 99 alternative. Most commenters were interested in a site plan that would still use the eastern portion of the alternative but would avoid businesses in the Midway Shopping Center, specifically Dick's Drive-In and Lowe's.

4.2.3 Midway Landfill Sites (I-5 and SR 99)

About 690 comments concerned the Midway Landfill site, including comments regarding either the Midway Landfill and I-5 site or the Midway Landfill and SR 99 site, and comments that did not distinguish between the two different alternatives. Of those stating an opinion, approximately 615 commenters supported the alternatives at the Midway Landfill and 45 commenters opposed using the landfill for the project.

The most common themes for the Midway Landfill sites were related to property acquisitions and the impacts of remediating a Superfund site. Major themes for comments in support of the landfill were related to the lower number of residential and business displacements, the use of undeveloped land, and the responsibility of the government to clean up an otherwise unusable site. Major themes for comments opposed to the landfill sites were related to the potential dangers of releasing hazardous materials and the higher costs associated with developing on a landfill.

Several commenters had questions about the current status of the landfill sites and requested more information regarding cleanup processes and cost estimates. Many commenters who supported using the general Midway Landfill site mentioned that it would be worth the higher cost to build a maintenance facility on undevelopable land. Some commenters suggested that Sound Transit should investigate alternate funding sources for developing on a Superfund site, including federal funds from EPA, local funds in addition to taxes levied by ST3, and potential third-party funding sources. There were also some design modification comments that suggested excavating the landfill material and moving it off site, and then constructing the OMF South on top of the site.

Midway Landfill and I-5

About 115 comments were specific to the Midway Landfill and I-5 alternative. Of those stating an opinion, 110 supported the site and 5 opposed the site. Commenters who preferred this alternative over the Midway Landfill and SR 99 option mentioned that it would cause less traffic disruption, be less of a visual/noise nuisance, and disrupt fewer potential TOD areas along SR 99.

Midway Landfill and SR 99

About 70 comments were specific to the Midway Landfill and SR 99 alternative. Of those stating an opinion, 55 supported the site and 10 opposed the site. Most commenters who preferred this alternative over the Midway Landfill and I-5 option did not indicate specific benefits. Two potentially impacted businesses, U.S. Towing and AAA Contractors, Inc., wrote comments to express their opposition to the site because of potential economic impacts associated with displacement. Additional comments from the businesses included concerns of increased traffic along Pacific Highway and testing requirements on the landfill.

4.2.4 S 316th St and Military Rd

About 145 comments related to the S 316th St and Military Rd alternative. Of those stating an opinion, 50 supported the site and 60 opposed the site. Major themes for comments in support of this site included fewer business displacements and distance from potential TOD. Major themes for comments opposed to this site included residential displacements, impacts to waterbodies and critical areas, and construction costs.

Many commenters were concerned about residential displacements and neighborhood impacts. Comments mentioned zoning inconsistencies and noise concerns in a residential area, in addition to displacement of low-income or minority populations. About 25 comments were also concerned with impacts to wetlands, waterbodies, and environmentally critical areas. Comments mentioned the importance of Lake Dolloff, Mill Creek, and Mullen Slough for surface water management and wildlife habitat, including for endangered salmonids.

Several commenters were concerned about construction impacts and costs associated with tracks needing to cross over I-5. Additionally, one comment suggested modifying the site design to accommodate the planned roadway improvements at I-5 and S 312th Street.

4.2.5 S 336th St and I-5

About 145 comments concerned the S 336th St and I-5 alternative. Of those stating an opinion, 85 supported the site and 50 opposed the site. Common themes for comments in support of this site included fewer residential and business displacements and relatively low cost. Some commenters mentioned that the location appears easily accessible to the future TDLE project. Major themes for comments opposed to this site included neighborhood impacts, relocation of the Christian Faith Center church and school, and distance of the site from the FWLE. Some commenters were also concerned with increased traffic along SR 99 resulting from this alternative.

4.2.6 S 344th St and I-5

About 190 comments concerned the S 344th St and I-5 alternative. Of those stating an opinion, 45 supported the site and 105 opposed the site. Major themes for comments in support of this site included its relatively low cost and ease of access. Major themes for comments opposed to this site included noise and traffic impacts, site topography, and residential and business displacements.

Three impacted businesses, including Garage Town, Northwest Equipment, and Ellenos Yogurt submitted comment letters to express their opposition to this site. About 65 commenters were concerned about the displacement of Garage Town, which houses over 60 individually rented or owned storage condominiums for cars, RVs, boats, and private workshops. Commenters stated concerns regarding the property impact and economic activity totals shown in evaluations and public materials, believing that they did not accurately reflect all parties, including individual property owners or businesses, that would be affected by displacements. They also questioned the site's transportation and access ratings in Sound Transit materials.

Additionally, about 15 comments expressed concerns with impacts to environmentally critical areas in proximity to the S 344th St and I-5 alternative. Many commenters were concerned about Hylebos Creek, including its associated wetlands and vegetated areas. Some commenters also mentioned concerns about site topography and steep slopes.

4.3 Summary of Comments Received Prior to Scoping

There were 2,161 email comments received between late January and early February 2019 prior to the start of the scoping period. Major themes for pre-scoping comments included opposition to the S 240th St and SR 99 site, support for the general Midway Landfill site, and concerns about business displacements and community impacts. These emails contained about 1,975 comments mentioning Dick's Drive-In, 265 comments mentioning Lowe's, and 80 comments mentioning the Midway Shopping Center.

The full set of public comments received prior to scoping is in **Appendix F**, Comments Received Prior to Scoping Period.

5 NEXT STEPS

Sound Transit will use the information received during scoping, as well as information developed to identify the alternatives to be studied in the EIS, to develop next steps and inform the Sound Transit Board in their decision-making for the project. Sound Transit will continue to work with the community and the Elected Leadership Group, Stakeholder Group, Interagency Group, and Sound Transit Board of Directors throughout the project. As the project moves forward, Sound Transit will conduct 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.

An overview of the alternatives development process is shown in **Figure 5-1**.

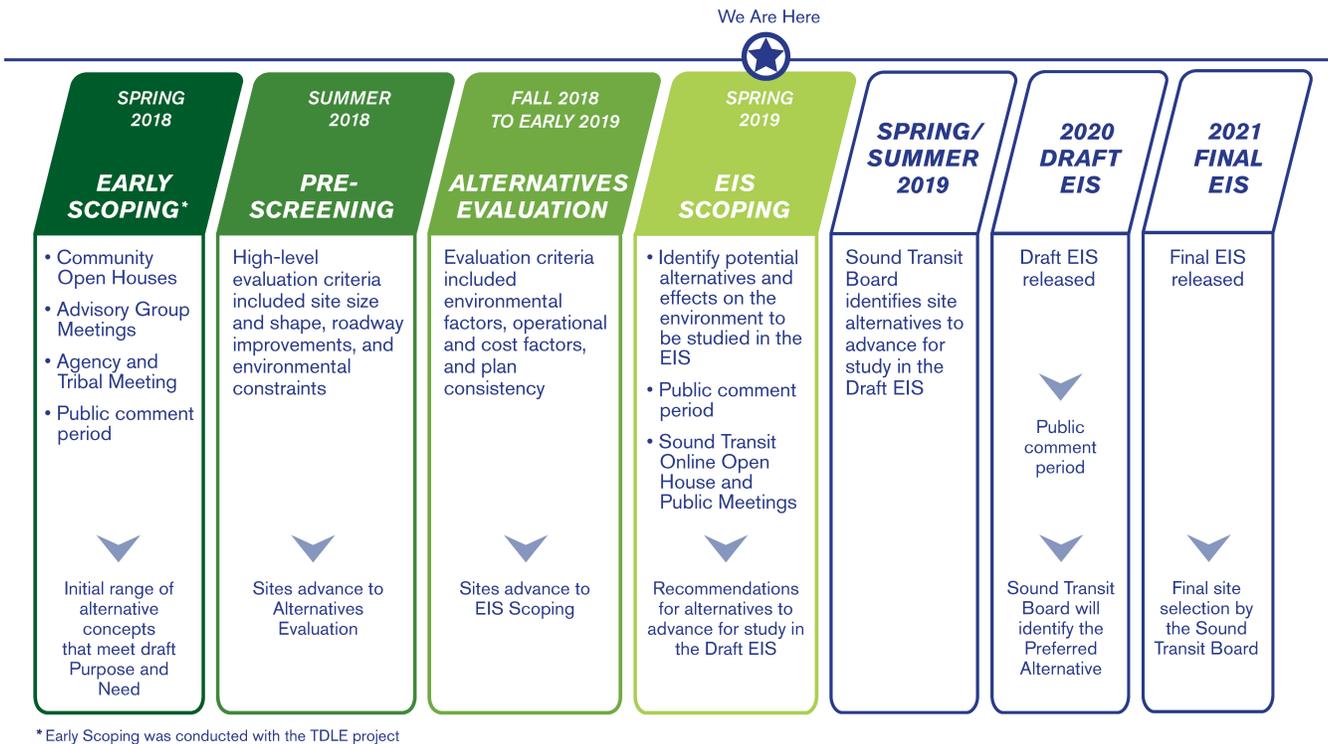


Figure 5-1 Alternatives Development Process

Once the EIS alternatives are identified by the Sound Transit Board, Sound Transit will analyze the environmental impacts and benefits of the project in a SEPA DEIS. Publication of the DEIS is anticipated in 2020 and will be followed by a formal public, agency, and tribal comment period. A Final EIS (FEIS), which includes responses to public, agency, and tribal comments, is anticipated to be published in 2021. After publication of the FEIS, the Sound Transit Board will select the project to be built. Final design, construction, and testing of the facility will take place from 2021 to 2026. Operation of the OMF South is expected to begin in 2026. An overview of the project timeline is shown in **Figure 5-2**.



Figure 5-2 Project Timeline

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SUPPORTING DOCUMENTATION

Sound Transit. 1996. Sound Move—The Ten-Year Regional Transit System Plan. Adopted May 31, 1996.

Sound Transit. 2008. Sound Transit 2: A Mass Transit Guide—The Regional Transit System Plan for Central Puget Sound. July 2008.

Sound Transit. 2016. Sound Transit 3: The Regional Transit System Plan for Central Puget Sound. June 2016.

Sound Transit. 2018. Early Scoping Summary Report. June 2018.

Sound Transit. 2019a. OMF South Alternatives Evaluation Technical Memorandum. February 2019.

Sound Transit. 2019b. OMF South Scoping Information Report. February 2019.

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