



Operations and Maintenance Facility South

Draft Environmental Impact
Statement Comment
Summary Report

November 2021

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Acronyms and Abbreviations

Belmor	Belmor Park Golf & Country Club
Board	Sound Transit Board of Directors
CFR	Code of Federal Regulations
Ecology	Washington State Department of Ecology
EIS	Environmental Impact Statement
EJ	environmental justice
FWLE	Federal Way Link Extension
LOS	level of service
LRV	light rail vehicle
Metro	King County Metro
NPDES	National Pollutant Discharge Elimination System
OMF	operations and maintenance facility
OMF South	Operations and Maintenance Facility South
RCA	Resource Conservation Area
SEPA	State Environmental Policy Act
Sound Transit	Central Puget Sound Regional Transit Authority
Sound Transit 3	Sound Transit 3: The Regional Transit System Plan for Central Puget Sound
SPU	Seattle Public Utilities
SR	State Route
TDLE	Tacoma Dome Link Extension
WSDOT	Washington State Department of Transportation

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1 INTRODUCTION

The Central Puget Sound Regional Transit Authority (Sound Transit) is proposing to build an operations and maintenance facility (OMF) in the South Corridor to support Sound Transit's Link light rail system expansion. This expansion and the related increase in the light rail vehicle (LRV) fleet and daily operations is identified in Sound Transit 3: The Regional Transit System Plan for Central Puget Sound (Sound Transit 3). Under Sound Transit 3, the light rail system in central Puget Sound would grow to 116 miles with over 80 stations. Light rail would expand north to Everett, south to Federal Way and Tacoma, east to Redmond, south Kirkland, and Issaquah, and west to West Seattle and Ballard, as shown in Figure 1-1. To support the system expansion, new operation and maintenance facilities are needed in the North and South Corridors in addition to the existing OMF Central and recently constructed OMF East.

1.1 Purpose of this Report

Sound Transit published the Operations and Maintenance Facility South (OMF South) State Environmental Policy Act (SEPA) Draft Environmental Impact Statement on March 5, 2021, and requested public comments during an extended 45-day comment period that lasted through April 19, 2021. The Draft Environmental Impact Statement evaluated the potential impacts of OMF South to the natural and built environment at three alternative locations, shown in Figure 1-2. The alternatives are the Midway Landfill Alternative, South 336th Street Alternative, and South 344th Street Alternative.

This report describes the Draft Environmental Impact Statement comment period process and summarizes the comments received from agencies, tribes, and the public. Appendix A contains the comment letters and communications from tribes, agencies, and elected officials. Appendix B contains comment letters and communications from businesses and community groups. Appendix C contains comment letters, communications, and transcripts of the public comments.



Figure 1-1 Link System Future Expansion and OMF Site Locations

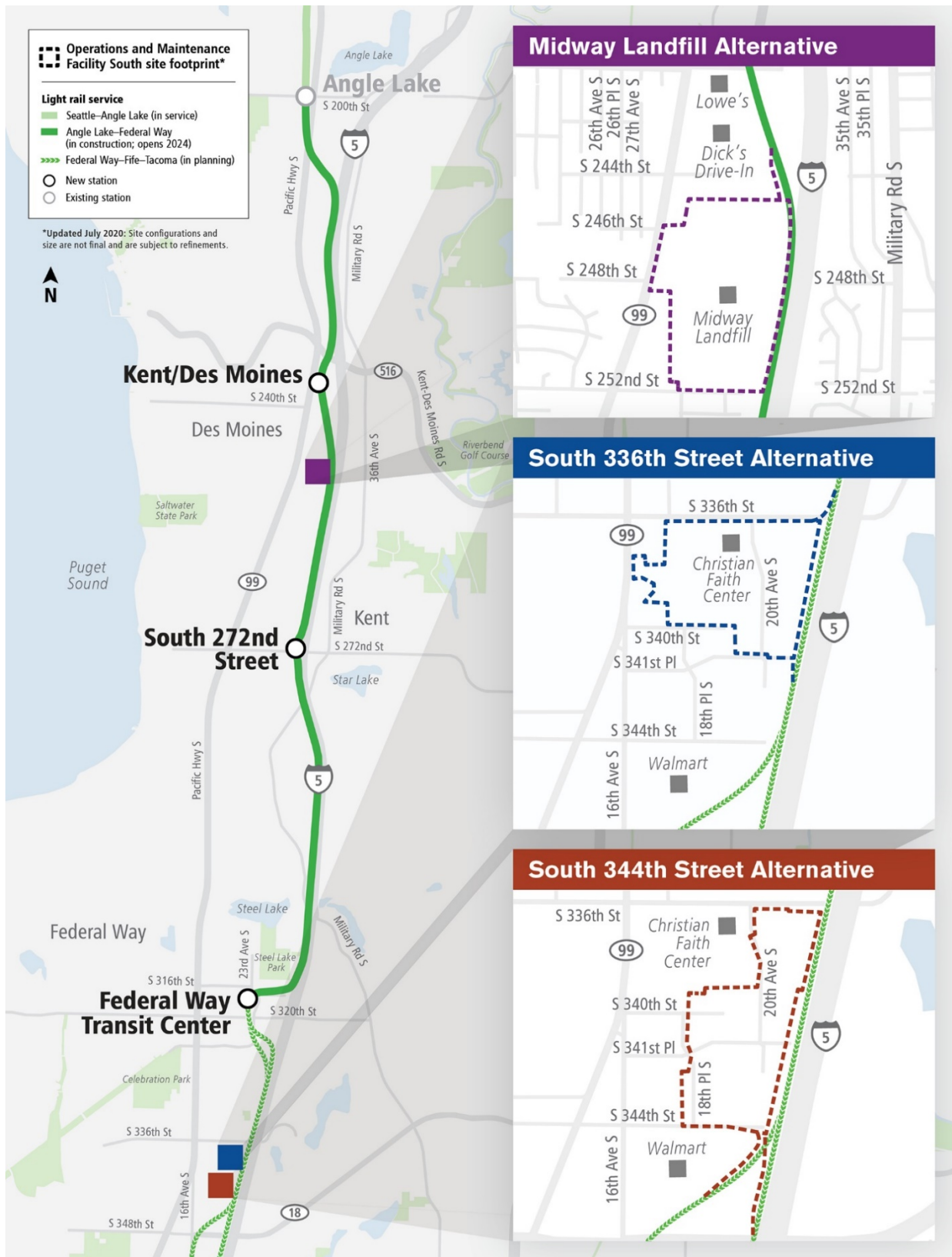


Figure 1-2 OMF South Alternatives

2 COMMENT PERIOD OUTREACH

2.1 Comment Opportunities

The comment period for the SEPA Draft Environmental Impact Statement was from March 5 to April 19, 2021. Sound Transit extended the required 30-day comment period by an additional 15 days to give reviewers more time to consider the document. SEPA rules (WAC 197-11-455) allow an extension of 15 days upon request, but Sound Transit proactively extended the comment period. Opportunity to comment was provided by online comment form, email, phone, U.S. mail, and verbally during online public hearings. Due to COVID-19 restrictions, the two public hearing events were held virtually during the 45-day comment period.

The following commenting methods were available:

- Online: OMFSouth.participate.online
- Email: OMFSouthDEIS@soundtransit.org
EmailTheBoard@soundtransit.org¹
- Phone: (206) 257-2135
- Mail: OMF South Project, c/o Hussein Rehmat
Sound Transit
401 S Jackson Street
Seattle, WA 98104
- Verbally: Virtual Public Meetings/Hearings

2.2 Outreach During the Draft Environmental Impact Statement Comment Period

Sound Transit used several methods to engage agencies and the public during the Draft Environmental Impact Statement comment period. The methods included briefings with the potentially affected cities, two online informational meetings, and an online open house, which was available for the duration of the comment period.

2.2.1 City, Agency, and Stakeholder Meetings

During the comment period, Sound Transit met with representatives from the cities of Kent and Federal Way; local business and community groups; potentially impacted residents and community members; and Sound Transit partner agencies to share information about the Draft Environmental Impact Statement, review the analysis, and answer questions. Table 2-1 lists the participants and date of each stakeholder meeting held during the comment period. Table 2-2

¹ Note: The Draft Environmental Impact Statement did not list this Board email address as a means to submit comments. However, after several people used it, the decision was made to include the submittals as part of the public comments.

lists briefings, listening sessions, and meetings with potentially impacted property owners, community groups, and other organizations in the project area.

Table 2-1 City, Agency, and Stakeholder Meetings during the Comment Period

Group	Meeting Date
Cities	
Mayor of Kent	March 9, 2021
Kent City Staff	March 11, 2021
Kent City Council	March 9, 11, and 16, 2021
Kent Chamber of Commerce	April 1, 2021
City of Kent Monthly Meeting	April 12, 2021
Mayor of Federal Way	March 8, 2021
Federal Way City Staff	March 11, 2021
Federal Way Chamber of Commerce Government Affairs Committee	March 11, 2021
Federal Way City Council	March 9, 10, 11, and 16, 2021
Federal Way Chamber of Commerce	March 17, 2021
City of Federal Way Planning Commission	March 17, 2021
Des Moines City Council	March 18, 2021
City of Federal Way Monthly Meeting	April 15, 2021
Agencies and partners	
Elected leaders in the project area	March 5, 2021
Washington State Department of Ecology, Seattle Public Utilities, Environmental Protection Agency	March 10, 2021
System Expansion Committee	March 11, 2021
Interagency Group	March 16 and April 20, 2021
Citizen Oversight Panel	March 17, 2021

Table 2-2 Briefings, Property Owner Meetings, and Listening Sessions

Group	Meeting Date
Belmor Park Leadership	March 8, 2021
Federal Way Black Collective	March 11, 2021
Pacific Christian Academy	March 31, 2021
Christian Faith Center	March 31, 2021
Residential Property Owner Briefing	March 30, 2021
Commercial Property Owner Briefing	March 31, 2021
Belmor Park Residents	April 5, 2021
GarageTown	April 7 and 12, 2021
Multi-Service Center	April 15, 2021

2.2.2 Online Informational Meetings

Sound Transit held two online informational meetings/public hearings using Zoom:

- Wednesday, March 24, 2021, 5:30 p.m. – 7:30 p.m.
- Tuesday, March 30, 2021, 11:00 a.m. – 1:00 p.m.

The meetings/public hearings were held a week apart on different days of the week and at different times of day to accommodate varying stakeholders' ability to attend and participate.

The meetings began with an informational presentation followed by a question-and-answer forum with Sound Transit staff and technical experts. The remainder of the meeting was reserved for a public hearing where participants could provide verbal comments. A court reporter recorded spoken statements made during the virtual comment hearing. Meeting attendees also had access to an electronic comment form and could submit comments electronically at any point during the meeting.

The online informational meetings were structured with a focus on equity and accessibility for attendees. The meetings were held on Zoom and utilized standard accessibility features, including screen-reader capabilities. Live-caption subtitles (in English) were provided by a third-party during both Zoom meetings. Translation assistance was available in Spanish, Russian, and Korean for the March 24 meeting and in Spanish and Russian for the March 30 meeting. Languages available for translation were based on the demographic data of the study area. Sound Transit staff communicated language and accessibility features at the beginning and throughout the meetings to ensure attendees understood how to fully participate.

During the public comment portion of each hearing, historically underrepresented and underserved populations were invited to comment first, followed by people with disabilities or those who may have needed additional time or assistance.

2.2.3 Online Open House

An online open house was available at <https://omfsouth.participate.online/> for the duration of the comment period to inform the public about the project and provide an opportunity to receive feedback using social media tools.

Between March 5 and April 19, 2021, over 2,400 visitors accessed the online open house. Visitors were given the opportunity to comment on the OMF South Draft Environmental Impact Statement's findings using an embedded electronic comment form. Approximately 95 people submitted comments via the online open house.

2.2.4 Outreach to Minority, Low-Income, and Limited-English-Proficiency Populations

Sound Transit made particular effort to provide information to and communicate with minority and low-income populations, and those with limited proficiency in English. These efforts included the following:

Materials:

- The online open house was fully translated in English, Spanish, Korean, and Russian, which were identified as key languages in the project area. The website was also screen-reader accessible.
- The narrated presentation that provided an overview of the project and site alternatives included Spanish, Korean, and Russian subtitles.
- The project mailer that announced the publication of the Draft Environmental Impact Statement included information in English, Spanish, Korean, and Russian. Sound Transit collaborated with stakeholder organizations to review the mailer content translations to ensure clarity.
- A toolkit with draft email, newsletter, and social media content was distributed to cities and other community partners to share through their communication channels. The toolkit was translated into Spanish.
- A Draft Environmental Impact Statement handout summarizing key findings was available in print and online. The handout was fully translated in English, Spanish, Korean, and Russian. The online version was also screen-reader accessible.

Publications:

- Advertisements promoting the Draft Environmental Impact Statement comment period were placed in Tu Decides, the International Examiner, El Siete Dias, Korean Times Seattle, and Russian Town Seattle. Geo-targeted Facebook advertisements in English, Russian, and Spanish also ran through the duration of the comment period.

Events and briefings:

- Simultaneous interpretation in Spanish and Russian were available for both virtual public hearings, with Korean also available for the first meeting. Captions in English were available in addition to screen-reader accessibility for both meetings.
- During the public comment portion of each hearing, historically underrepresented and underserved populations were invited to comment first, followed by people with disabilities or those who may need additional time or assistance.
- Briefings were offered to social service organizations and community groups in the project area.

Property owner meetings:

In early January 2021, Sound Transit mailed letters to all potentially affected property owners. The letter included a link to an online scheduling tool where property owners could sign up for a residential or commercial property owner briefing with the project team. The meetings included information about the OMF South project, the environmental review process, and the property acquisition and relocation processes. The Sound Transit project team also followed up with property owners by phone.

2.3 Summary of Public Participation and Outreach

During the extended comment period:

- Legal notices were published in the Seattle Times, Tacoma News Tribune, and Daily Journal of Commerce and provided information about the availability of the Draft Environmental Impact Statement and public hearings on March 3, March 10, and March 17, 2021.
- More than 120 people attended the two virtual public hearings held via Zoom on March 24 and 30, 2021.
- More than 2,400 people participated in the online open house, which was available in English, Korean, Spanish, and Russian. The Spanish site received approximately 14 percent of total visits, the Russian site received approximately 3 percent of total visits, and the Korean site received approximately 2 percent of total visits. In-language site participation correlated with demographic data in the project area: approximately 18 percent of the population speaks Spanish; approximately 4 percent of the population speaks Russian; and approximately 3 percent of the population speaks Korean.
- Several posts were published on Sound Transit's Facebook page (33,433 subscribers) and Twitter account (88,700 followers).
- More than 14,000 social media user clicks and engagements were recorded on Sound Transit's Facebook and Twitter pages.
- Almost 9,000 mailers were sent to homes, apartments, and businesses in Kent and Federal Way within 0.5 mile of site alternatives. The mailer included translations in Korean, Russian, and Spanish.
- One news release and three update notices were sent to an email list with approximately 7,000 subscribers.
- Display advertisements and online community calendar postings were placed in seven local online and print publications, and promoted posts were placed on Facebook for zip codes in the project area, recording more than 1,000 clicks and engagements.
- Seven virtual presentations/briefings were provided to potentially impacted property owners, community groups, and other organizations in the project area, as listed in Table 2-2.

3 COMMENT SUMMARY

Sound Transit received, in total, over 270 communications during the OMF South Draft Environmental Impact Statement comment period. A communication is defined as either a letter, email, voice mail, transcribed oral comment, or electronic comment form, and there are often multiple individual comments within each communication. A majority of these communications were from the general public (250 communications), and the remainder were from government sources, such as tribes, agencies, jurisdictions, and elected officials, and from affected businesses and community groups. Communications are summarized below according to their sources.

3.1 Summary of Comments from Tribes, Agencies, Jurisdictions, and Elected Officials

Sound Transit received 10 communications from the following tribal, state, county, and local agencies and jurisdictions and elected officials. No federal agencies submitted comments.

- Puyallup Tribe of Indians
- Washington State Department of Ecology (Ecology)
- Washington State Department of Transportation (WSDOT)
- King County Metro Transit Department (Metro)
- City of Des Moines
- City of Kent
- City of Federal Way
- Federal Way Public Works Department
- Seattle Public Utilities (SPU)
- Representative Jesse Johnson, 30th Legislative District

3.1.1 Tribes

Puyallup Tribe of Indians

The Puyallup Tribe of Indians prefers that OMF South be placed at the Midway Landfill. The Tribe's comments primarily concerned potential impacts to ecosystems (streams and downstream fish habitat) as well as water resources. The Puyallup Tribe of Indians noted the significant effort and resources of the Tribe, the Natural Resource Damage Trustees, the City of Tacoma, the Port of Tacoma, and WSDOT that have been applied towards property acquisition, habitat restoration, cleanup, and stream enhancement throughout the Hylebos Creek watershed over the past two decades as well as future planned improvements to Hylebos Creek downstream of Federal Way.

The Puyallup Tribe of Indians also highlighted the importance of the protection and treatment of stormwater at OMF sites and the potential downstream effects to Hylebos Creek. The Puyallup Tribe of Indians is opposed to any proposal that would place more of the creek or its tributaries

in pipes or culverts. The Tribe is also opposed to any proposal that would reduce water treatment opportunities or recharge of the creek.

Tribal data shows that Chinook salmon have been documented as far north as S 356th Street in Federal Way. The Puyallup Tribe of Indians asked that the description of the distribution of Chinook salmon be revised to reflect tribal fisheries data in the Final Environmental Impact Statement.

3.1.2 State Agencies

Washington State Department of Ecology

Ecology's comments on the OMF South Draft Environmental Impact Statement all concerned the Midway Landfill Alternative, and most comments were on the Midway Landfill Support Documents, Appendices D1 through D4. Generally, Ecology asks questions about the assumptions that were made for the amount and suitability of fill material for reuse, cost estimates associated with excavation scenarios, and the allowed acreage of exposed landfill. They asked how the assumptions and analysis might be different based on what Sound Transit has learned from working within the Midway Landfill on the Federal Way Link Extension (FWLE), including reuse percentages, hazards of landfill materials, and observed schedule risk.

Washington State Department of Transportation

The comments from WSDOT were primarily related to potential impacts to visual and aesthetic resources, the planned mitigation for impacts to roadside vegetation, and the two Resource Conservation Areas (RCAs) along I-5. For example, they noted that RCA mitigation requirements — the primary of which is avoidance — are different from vegetation replacement requirements and the two should be treated differently. In addition, they asked that the impact to high-sensitivity viewers, such as tourists, sightseers, and people driving for pleasure, be included in the analysis.

WSDOT noted that the Midway Landfill Alternative figures show the potential limits of construction to the edge of I-5. They stated that it is not likely that Sound Transit would be allowed to use or cross through that area during WSDOT's construction of the State Route (SR) 509 completion project, anticipated to occur between 2024 and 2028.

Last, WSDOT stated that upcoming state legislation (the new HEAL Act) will require consideration of impacts to environmental justice and vulnerable populations. WSDOT asked how the Sound Transit Board of Directors (the Board) will consider the potential impacts of the OMF South project to these populations in their decision-making process.

3.1.3 Regional and Local Agencies and Jurisdictions

King County Metro

King County Metro is primarily concerned with impacts to transit for each of the OMF South alternatives, particularly the proposed use of SR 99 as a haul route during site construction. They noted that construction of OMF South at the Midway Landfill Alternative would likely have the greatest impact to their operations.

Metro asked Sound Transit to include transit-specific mitigation in the Final Environmental Impact Statement and to include transit in the construction transportation management plan.

Their letter suggested specific traffic study revisions to clarify how level of service (LOS) is measured and defined at intersections under two-way stop control. Metro also asked to clarify truck traffic impacts at S 272nd Street, Kent-Des Moines Road, and the SR 99 northbound HOV lane during construction for the Midway Landfill Alternative, along with the potential traffic impacts of the proposed mitigation measures for the S 246th Street/SR 99 intersection.

City of Des Moines

The city of Des Moines supports light rail expansion as long as it does not adversely affect the surrounding neighborhoods, including Highline College, the Kent-Des Moines station area, and the business district along SR 99, or livability for current residents, workers, and shoppers. Des Moines supports the Midway Landfill Alternative because its use avoids the impacts associated with the two Federal Way alternatives.

As for specific comments, Des Moines suggested an LOS analysis for construction traffic and for additional intersections, called for a more detailed evaluation of potential mitigation for construction haul routes, and asked whether new PM peak hour trips would be added. In addition, Des Moines asked to be included as a reviewing agency for the Drainage Site Plan, Technical Information Report, and the Stormwater Pollution Prevention Plan and as an affected agency for compliance review of the National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Requirements.

If the Midway Landfill Alternative is identified by the Board as the preferred alternative, Des Moines states that Sound Transit will need to more fully develop or acknowledge impacts associated with the construction timeline; impacts on community and businesses from the number and duration of truck trips; and risks to human health from potential release of contamination. The city also asks Sound Transit to acknowledge that unknown risks from working in a Superfund site could affect construction schedule and costs.

City of Kent

The city of Kent does not object to the placement of OMF South within its city limits as long as it is placed at the Midway Landfill. The city asked for clarification on the project's Purpose and Need, how OMF South fits with FWLE, and why the OMF South annual operating cost estimates would be higher for the Midway Landfill Alternative than for the South 336th and 344th Street alternatives.

Concerning the transportation analysis, the city of Kent had several comments on LOS thresholds and mitigation and construction-related traffic impacts. Kent updated its Transportation Master Plan in March 2021 and asked that LOS standards and the list of anticipated projects in Kent be revised to reflect the new plan. Kent asked that Sound Transit consult with WSDOT regarding direct access to I-5 to minimize truck trips during construction if the Midway Landfill Alternative is selected by the Board, particularly for the Full Excavation and Hybrid subsurface design options. Additionally, Kent stated that a parking study will be required if the Midway Landfill Alternative is chosen to be built. The city also had several comments concerning impacts to land use and economics, such as asking for more detail on the businesses displaced, noting that the facility would be allowed under a conditional use permit, and asking for identification of the actual number of displaced employees.

As a general comment, Kent asked why OMF South is larger than OMF Central and OMF East. The letter also noted that the sizes of the build alternatives have grown since early discussions with Sound Transit and asked for an explanation.

Kent included several comments about the Midway Landfill Support Documents in Appendix D. These comments concern assumptions about the design and construction of OMF South at the landfill, such as the excavation work window, areas of open excavation allowed, and the diameter and spacing of drilled shafts. These comments generally ask how these assumptions were made and whether these assumptions could change or be revised to decrease construction cost and duration.

Further, Kent asked for a complete list of assumptions made for the analysis of each alternative. Last, the letter closed with a list of potential funding resources for building OMF South at the Midway Landfill.

City of Federal Way (Mayor and City Council)

The letter, signed by Federal Way's mayor and all seven of its councilmembers, stated support for the Midway Landfill Alternative and opposition to any alternative site in Federal Way.

The letter questioned the inclusion of cost information in the Draft Environmental Impact Statement along with assumptions concerning the city of Federal Way's approval for vacating public roads and modification of development standards to permit OMF South. The letter also questioned whether there are adequate mitigation opportunities for the identified impacts.

City of Federal Way (Public Works and Community Development Directors)

In a separate letter, the city of Federal Way provided technical comments and input on the Draft Environmental Impact Statement. The letter began with a number of questions and comments about cost and schedule and voiced that estimated project costs and construction schedules are not required to be considered under the SEPA. The city suggested that only environmental impacts should be considered in a SEPA Environmental Impact Statement.

The letter listed several corrections and clarifications to be made to the Transportation Technical Report. The city noted that Sound Transit will be required to mitigate all vacated public roadways by incorporating roadways of identical functionality in a manner that complies with the city's block perimeter requirements and comprehensive plan. Federal Way disagrees with the Draft Environmental Impact Statement's data showing that vacating 20th Avenue S would have very little impact to response times for emergency service vehicles. The city asked that a north-south replacement route be provided.

Federal Way had several comments concerning economic and fiscal impacts related to employee and business displacement in addition to taxable valuations. The city hired an outside consultant (FCS Group) to review the economic analysis and attached their report to the letter. Generally, the city does not believe that the Draft Environmental Impact Statement analysis considered the opportunity cost difference between the three site alternatives, stating that the Midway Landfill Alternative would have a relatively low opportunity cost in terms of redevelopable lands as compared to the site alternatives in Federal Way.

The city's comments about land use impacts concerned the compatibility of OMF South with the surrounding uses and with comprehensive plan policies. The city noted that the project design is not advanced enough to determine whether adequate room exists for appropriate compatibility between land uses. Similarly, related to cumulative impacts, the city noted that Tacoma Dome Link Extension (TDLE) and OMF South (should a Federal Way site be chosen) will convert land in the only light industrial zone in Federal Way, which could lead to sprawl or development of previously undeveloped land. The city stated that the Draft Environmental Impact Statement

should have included a comprehensive analysis of the cumulative impacts of this land conversion.

Federal Way stated that mitigation described in the ecosystems and water resources sections of the Draft Environmental Impact Statement is written in a broad manner and needs to include more specifics to evaluate the feasibility of the South 336th and South 344th Street alternatives. This concern was noted particularly with regard to mitigation and compliance with city regulations. The city also included comments on the noise and visual analyses. Regarding the visual analysis, the city stated that visual impacts to the historic Weyerhaeuser campus were not adequately addressed. The city also asked about assumptions in Appendix G2, Noise and Vibration Technical Report, concerning verification of project noise levels and audible signals at light rail crossings.

Seattle Public Utilities

SPU provided specific comments on the Draft Environmental Impact Statement, focusing on the Midway Landfill Alternative. SPU notes concerns over the depth and type of fill and the potential for settlement and offers suggestions to mitigating these concerns. SPU disagrees with the Draft Environmental Impact Statement's assumption that the construction of OMF South at the Midway Landfill would lead to the greatest conversion of pervious surface to impervious surface, noting that the current landfill cap is designed to be impervious, and therefore there would be little to no conversion.

SPU asked how various assumptions or risks identified in the Draft Environmental Impact Statement compare to what is being experienced during FWLE construction, as SPU implies that the assumptions for OMF South are too conservative. These include managing the landfill gas collection system, construction work windows, landfill material reuse, haul truck size, tolerances for settlement, and mitigation of hazardous materials removal. For example, SPU points to the fact that during FWLE construction, excavation within the landfill was not restricted to 22 weeks and that screened waste was transported in 48-foot containers as instead of 20-foot containers.

SPU asked how Sound Transit developed estimates for real estate and relocation costs because they believe the estimate for the Midway Landfill Alternative is high. They also noted that there would likely be less chance of delays and costs associated with appeals or lawsuits for the Midway Landfill Alternative and asked whether Sound Transit should include that as a consideration.

3.1.4 Elected Officials

Representative Jesse Johnson

Jesse Johnson is a Washington State Representative for the 30th Legislative District, which includes the cities of Des Moines and Federal Way. In his comment, Representative Johnson requested that OMF South not be considered in Federal Way, based on input from his constituents.

3.2 Summary of Comments from Businesses and Community Groups

Sound Transit received 12 communications from the following potentially affected businesses and community groups:

- Christian Faith Center
- Pacific Christian Academy
- Ellenos Yogurt
- Schindler Family Limited Partnership
- GarageTown
- Red Canoe Credit Union
- Federal Way Custom Jewelers
- Northwest Equipment and Sales
- Race King, LLC
- 1910 and 1934 South 344th Street
- Federal Way Chamber of Commerce
- Protect Federal Way

3.2.1 Christian Faith Center

Christian Faith Center submitted a comment letter written by their attorney, which states that they would prefer that the Christian Faith Center property was not part of any alternative. The letter explains that Christian Faith Center entered into a Development Agreement with the city of Federal Way related to property development, which contains commitments related to stormwater management, site access, mitigation and recreational areas. The agreement — the Concomitant and Development Agreement and Development Plan — is attached to the comment letter.

The letter also states that since Sound Transit identified the site as a potential alternative, campus development has been “stuck” in place and time. The Christian Faith Center has stopped planning and implementing projects, and their members have been anxious about the future of their church. Under the South 336th Street Alternative, Christian Faith Center would be forced to relocate and start a multiyear redevelopment process. Under the South 344th Street Alternative, the church would be unable to operate because the smaller site would leave them without the physical space necessary to meet the requirements of the Development Agreement with the city of Federal Way.

3.2.2 Pacific Christian Academy

Pacific Christian Academy notes that it is the largest Christian school in the Federal Way area and has a very diverse student body. The school has looked for options for a new site and has been unable to find an available site in the area. Pacific Christian Academy acknowledges Sound Transit’s outreach efforts and meetings with their Board of Trustees. They hope to have Sound Transit’s assistance in finding a new location, should their site be chosen for OMF South.

3.2.3 Ellenos Yogurt

The co-founders and current CEO of Ellenos Yogurt submitted a comment letter. They state that relocating their yogurt manufacturing facility would be catastrophic to their business. Ellenos Yogurt plans to start national distribution over the next 3 to 5 years and anticipates becoming a 24/7 operation by the end of 2022. The nature of the product is such that it has a short shelf life and cannot be stockpiled while the facility is moved.

Also, they state that a new facility will take a minimum of a year to build and test to ensure it meets product safety and quality parameters, and it would have to be fully functioning before they could close their current location. Ellenos Yogurt believes it would cost tens of millions of dollars to duplicate their existing facility and that the opportunity costs to their business would be virtually incalculable. The letter states that relocation costs alone are estimated to be over \$25 million, which does not account for tens of millions of dollars of additional opportunity costs. They ask Sound Transit to choose a different alternative.

3.2.4 Schindler Family Limited Partnership

Stephen Causseaux, the managing partner for the Schindler Family Limited Partnership that owns the Ellenos Building, sent a letter under the letterhead of his law firm, McCarthy and Causseux, expressed similar concerns as those from Ellenos Yogurt. The letter includes comments on the Draft Environmental Impact Statement concerning the value of and number of properties to be acquired, the nonexempt status of the Christian Faith Center, and impacts to WSDOT's Resource Conservation Areas. Similar to comments from the Ellenos co-founders and CEO, the letter cites concern over Ellenos Yogurt's need to have a second, fully functioning operation prior to relocation, the costs of relocation, and the lost opportunity costs. The letter states that selecting the South 344th Street Alternative would "put an end to Ellenos Yogurt".

3.2.5 GarageTown Condominium Association

Brad Thorson, the president of the GarageTown Federal Way Condominium Association, submitted two emails with comments on the Draft Environmental Impact Statement. In his first email, Mr. Thorson notes that the document should treat all 67 of the GarageTown tenants as individual property owners rather than GarageTown being treated as one business and that the parcel count should treat each GarageTown unit as separate parcels. Mr. Thorson states that he does not believe that GarageTown could be relocated in King County with the amount of money they would likely receive from Sound Transit and that their "community would be destroyed" as a result. Other comments concerned such things as the difficulty and cost of relocating Ellenos Yogurt, the number of churches impacted by the South 344th Street Alternative, and the fact that roadway improvements would be needed. He also asked that differences in impacts between sites be made clearer.

In his second email, Mr. Thorson again suggests that GarageTown owners be counted as individual commercial or residential owners so as not to distort the number of individuals impacted. He mentions the fact that the South 336th Street and South 344th Street alternatives would require excess mainline track if TDLE is not constructed and asks whether Sound Transit has sought out any federal or state grant funds to assist with construction of the Midway Landfill Alternative. Mr. Thorson also mentions that the Christian Faith Center may want to sell to Sound Transit.

Several comment letters were sent by owners of GarageTown units and were similar to the first email from Mr. Thorson. They are included in Section 3.3 Summary of Public Comments below.

3.2.6 Red Canoe Credit Union

The Red Canoe Credit Union submitted comments on behalf of their branch at S 336th Street and Pacific Highway South. They are concerned that construction of the South 336th Street Alternative may make it difficult for people to access the bank due to construction vehicle traffic and that access to their site would be closed due to roadway or sidewalk construction. They request that construction truck traffic access the freeway from S 336th Street and Weyerhaeuser Way S rather than using SR 99 and that both lanes of S 336th Street never be closed at the same time. The Credit Union supports the Midway Landfill as the best location for OMF South because it has the least impact on community and businesses and repurposes the landfill.

3.2.7 Federal Way Custom Jewelers

The owner of Federal Way Custom Jewelers commented through the online open house in support of the Midway Landfill Alternative. He expressed concern over the potential loss of clients if either the Christian Faith Center or Ellenos and other businesses are displaced. His comments note that the south Sound region has high levels of low-wage workers, people of color, and commuters who could rely on transit, yet they are getting light rail after other areas to the north and east.

3.2.8 Northwest Equipment Sales and Rentals

The owner of Northwest Equipment Sales and Rentals commented through the online open house, expressing concern over the potential displacement of his property at 2011 S 341st PI in Federal Way. He stated that there currently is no available property zoned M2 or M3 and therefore the South 344th Street Alternative could have a devastating effect on his business.

3.2.9 Race King LLC

Scott Halverson submitted a comment letter as the owner of the Race King LLC commercial property along Pacific Highway S (SR 99), within the footprint of the Midway Landfill Alternative. His concern is that further condemnation or easements would render his property unusable for the two businesses he currently runs. Mr. Halverson is willing to sell his property to Sound Transit as long as he could find a suitable replacement.

3.2.10 1910 and 1934 South 344th Street

Greg and Donna Olson submitted a comment letter concerning their commercial properties within the South 344th Street Alternative footprint. Along with listing information about the properties and their surroundings, they express concern about legal costs due to terminating their current lease agreement, recouping the money spent making capital improvements, and the difficulty of finding comparable properties elsewhere that could provide the same income. They invite Sound Transit to contact them for further discussion as needed.

3.2.11 Greater Federal Way Chamber of Commerce

The Greater Federal Way Chamber of Commerce is focused on economic diversity in Federal Way, including the maximum retention of commercial enterprises and what would be most favorable to new and existing economic opportunities. In their comment letter, the Chamber stated that transportation infrastructure is a priority to meet the demands of a growing business community in the South Puget Sound region and that OMF South is a critical component for the southern expansion of light rail. They ask that the Sound Transit Board note the guiding principles important to the Chamber in the evaluation of the three sites: creation of permanent,

sustainable living wage jobs; minimum business displacement for existing jobs; enhanced opportunities for transit-adjacent development; impact of economic multipliers in the community; environmental issues, including health concerns and the stewardship of resources such as wetlands and trails; and cost of strategic growth for transportation infrastructure.

3.2.12 Protect Federal Way

Protect Federal Way is a federally registered, nonconnected Political Action Committee opposed to the selection of the South 344th Street Alternative. Their comment letter restates some of the conclusions of the Draft Environmental Impact Statement and then states some additional concerns regarding the alternative. Protect Federal Way believes that relocation costs will be increased for businesses at the South 344th Street Alternative due to their industrial nature and states that comparable properties are not available in the area. They note that the site includes the last industrial zone in Federal Way, and they believe the selection of the site will “evict all industrial businesses from Federal Way, permanently.” Protect Federal Way believes that the real estate costs associated with the properties necessary for business relocation should be included in the Environmental Impact Statement.

Protect Federal Way also believes that many small businesses will close rather than relocate and associated jobs will be lost. They state the alternative has the most painful and highest cost to their community and ask that it be removed from consideration.

3.3 Summary of Public Comments

During the OMF South Draft Environmental Impact Statement comment period, Sound Transit received approximately 250 communications from the general public. The following subsections describe the nature of their comments. General or project-wide comment topics are described first, followed by comments about specific OMF South alternatives.

3.3.1 General or Project-Wide Comments

The most common general themes in the public comments, outside of statements for or against a particular alternative, concerned impacts to the community or neighborhood due to displacements of residents, businesses, and employees as well as impacts to natural resources such as streams, wetlands, and habitat. Figure 3-1 below shows the number of comments that mentioned these topics.

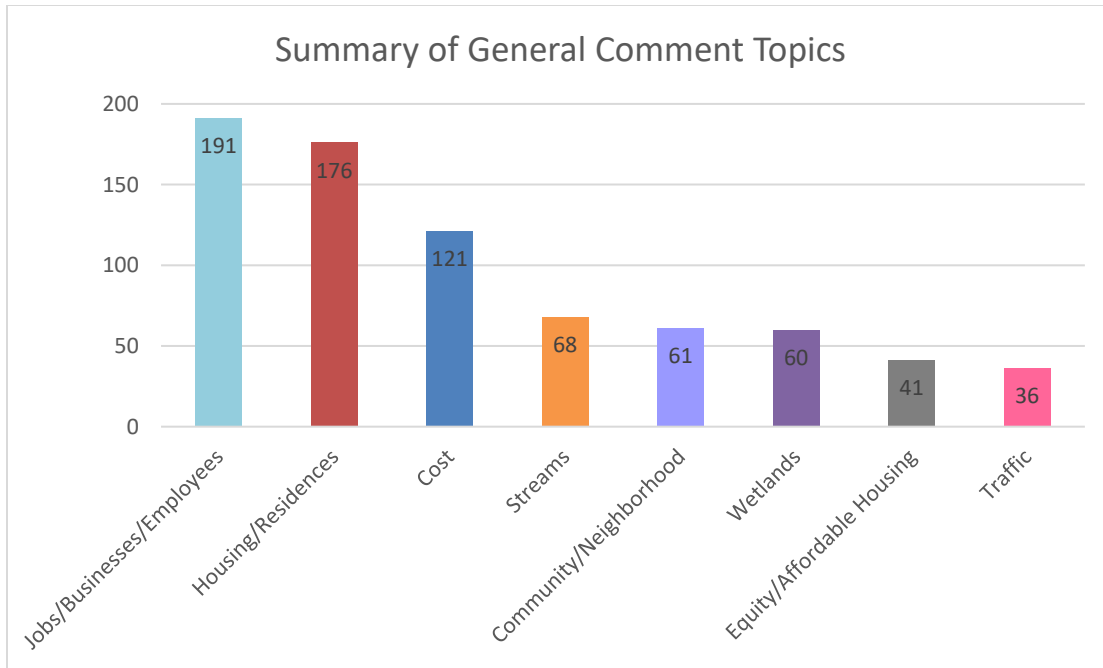


Figure 3-1 Summary of General Comment Topics

3.3.2 Alternative Preference

Most of the communications from the public expressed a preference for or against a specific alternative site. In general, most comments supported the Midway Landfill Alternative and/or opposed the South 344th Street Alternative.

Of the approximately 250 public commenters, about 210 people expressed support for a particular site: 160 people for the Midway Landfill Alternative, 40 people for the South 336th Street Alternative, and 10 people for the South 344th Street Alternative. At the same time, approximately 160 people expressed opposition for a particular site: 10 people against the Midway Landfill Alternative, 40 people against the South 336th Street Alternative, and 110 people against the South 344th Street Alternative. Many people expressed both preferences for and against multiple site alternatives; each preference statement was tallied individually. Figure 3-2 below shows a summary of site preference in support of and in opposition to each alternative.

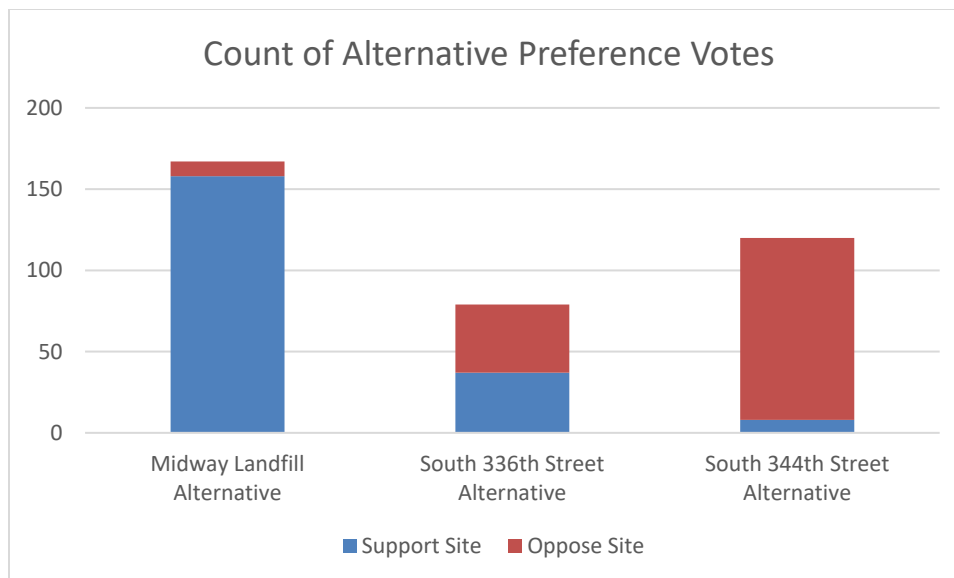


Figure 3-2 Summary of Alternative Preference

Approximately 30 people suggested alternative sites other than those evaluated in the Draft Environmental Impact Statement. Some of the suggestions, including the former Weyerhaeuser property and the Puyallup-Kits Corner Landfill, were for OMF South locations that were previously analyzed during the alternatives evaluation and not advanced for further consideration.

The reasons for the alternative preferences are described in the sections below, specific to each of the Draft Environmental Impact Statement build alternatives.

3.3.3 Midway Landfill Alternative

Approximately 170 people expressed an opinion regarding the Midway Landfill Alternative, and of those, about 95 percent supported the site. Some people specifically mentioned a preference for the Full Excavation or Platform subsurface construction design options. No commenter expressed a preference for the Hybrid subsurface construction design option.

The reasons most often given for support of the Midway Landfill Alternative were that it would have the least impacts to the natural and built environment and that it would provide an opportunity to clean up and improve an otherwise contaminated, vacant site. Of those who provided reasons for supporting the Midway Landfill Alternative, many cited the greater impact that the South 336th Street and South 344th Street alternatives would have to businesses, jobs, residents, and/or the natural environment.

People recognized that the Midway Landfill Alternative would be more expensive and take longer to construct, but many felt it was worth the extra cost and time. Several people suggested that Sound Transit investigate additional funding opportunities via the state and/or federal government for converting the Midway Landfill to a usable OMF site.

Reasons given in opposition to the Midway Landfill Alternative include the larger cost, longer construction time frame (and therefore greater construction impacts), and concerns over potential hazardous materials pollution.

3.3.4 South 336th Street Alternative

Approximately 80 people expressed an opinion regarding the South 336th Street Alternative. The preferences were split, with 47 percent of people supporting the site and 53 percent of people opposing the site.

Approximately 60 people mentioned the Christian Faith Center church and school. Some expressed concerns about impacting the Christian Faith Center because it is a place of worship for many, includes a school and daycare, and contributes to the community. Others mentioned the development agreement that Federal Way made with the Christian Faith Center and questioned how that agreement would apply to OMF South. Finally, others felt the South 336th Street Alternative made sense as compared to the Midway Landfill and South 344th Street alternatives, mentioning that the Christian Faith Center may be looking to sell its property.

The reasons given in support of the South 336th Street Alternative were generally that it struck a balance by having fewer impacts to residents, employees, and businesses than the South 344th Street Alternative and would be less costly, faster, and less risky than the Midway Landfill Alternative.

Opposition to the South 336th Street Alternative centered on impacts to residents, employees, and businesses — including organizations like the Christian Faith Center and, to a lesser extent, the impacts to the natural environment, such as wetlands and streams. Many commenters expressed concerns over the loss of affordable, single family residences and the impacts to their neighborhood or community due to the property acquisition and displacements that OMF South would require.

3.3.5 South 344th Street Alternative

Approximately 120 people expressed an opinion regarding the South 344th Street Alternative, and of those, about 93 percent opposed the site.

Public opposition to the South 344th Street Alternative centers on potential impacts to the natural and built environment. Of those who provided reasons for opposing the South 344th Street Alternative, the majority cited the greater impact that it would have to residents, businesses, and jobs (the most of any of the three alternatives). Similar to comments over the South 336th Street Alternative, many comments expressed concerns over the loss of affordable, single-family residences and the impacts to their neighborhood or community due to the property acquisition and displacements that OMF South would require. Others cited impacts to the natural environment, including streams and habitat.

Of those who expressed an opinion about the South 344th Street Alternative, approximately half mentioned concerns over the displacement of GarageTown and Ellenos Yogurt. The comments stressed that there are over 60 individual property owners of GarageTown, many of whom operate businesses out of their respective units, and it would be very difficult if not impossible to relocate the entire facility. In addition to concerns about job loss, the comments pertaining to Ellenos Yogurt emphasized the fact that the current manufacturing facility could not simply be relocated into a new facility; rather, it could take over 2 years to build up a new facility in which to transfer operations before closing the current one.

Approximately eight people supported the South 344th Street Alternative. Reasons for supporting the site included improvements to the neighborhood, the location of the site in relation to the Link system, and because the South 344th Street Alternative has a lower cost and shorter construction schedule compared to the other build alternatives.

4 NEXT STEPS

- **Board Identifies Preferred Alternative:** The Draft Environmental Impact Statement comment period closed on April 19, 2021. The Board is expected to identify a preferred alternative in late 2021, after public, agency, and tribal comments have been reviewed and considered.
- **Final Environmental Impact Statement:** Sound Transit will prepare a SEPA Final Environmental Impact Statement that analyzes the Preferred Alternative along with the other alternatives evaluated in the Draft Environmental Impact Statement. The Final Environmental Impact Statement will include and respond to substantive comments received on the Draft Environmental Impact Statement. Substantive comments include those which provide input on considerations and analyses within the Draft Environmental Impact Statement. Non-substantive comments, such as alternatives preferences and comments not related to the project, will be included in an appendix to the Final Environmental Impact Statement but will not receive individual responses.
- **Project Decision and Approval:** After the Final Environmental Impact Statement is published, which is anticipated in late 2022 or early 2023, the Board will select the project alternative to be built.

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APPENDIX A

Comments from Tribes, Agencies, and Elected Officials

COMMENTS FROM TRIBES, AGENCIES, AND ELECTED OFFICIALS

Tribes

- Puyallup Tribe of Indians

State Agencies

- Washington State Department of Ecology
- Washington State Department of Transportation

Regional and Local Agencies and Jurisdictions

- King County Metro
- City of Des Moines
- City of Kent
- City of Federal Way (Mayor and City Council)
- City of Federal Way (Public Works and Community Development Directors)
- Seattle Public Utilities

Elected Officials

- Representative Jesse Johnson

OMF South Draft Environmental Statement (EIS)

Sound Transit Review Board

The Puyallup Tribe Fisheries Department offers the following comments concerning the proposed Operations and Maintenance Facility South site alternatives. The South 336th St. and South 344th St alternatives would each require that significant portions of Hylebos Creek be tight lined to varying degrees. While each of the Alternatives identified likely has its merits, we wish to remind Sound Transit that the Puyallup Tribe, the Natural Resource Damage Trustees, the City of Tacoma and the Port of Tacoma as well as WSDOT have collectively spent tens of millions of dollar on property acquisition, habitat restoration, contaminants cleanup and stream enhancement projects throughout the Hylebos Creek watershed over the past 20 years.

In addition, WSDOT will be expanding the wetland and stream habitat complex as part of the Riparian Restoration Plan for the SR 167/SR 509 interchange known as the Gateway project. This entails enhancing over 153 acres of wetland, riparian and forested habitat forming a critical link to previously established mitigation sites located downstream of the two Federal Way OMF proposed alternative sites.

Fundamental to the success of these efforts is the protection and treatment of stormwater which originates throughout the Hylebos Creek basin including several of the sites submitted for consideration to host the OMF South complex. Placing any more of Hylebos Creek into a pipe/culvert runs counter to years of planning and restoration work that has already been achieved. Pipelines and underground drainage conveyances offer no means of water treatment or groundwater recharge whatsoever and are therefore viewed as incompatible with fish recovery.

Summer base flow conditions within Hylebos Creek are a limiting factor for salmonid production. Many reaches of Hylebos Creek that were formerly wetted year around are now ephemeral. Reduced flow conditions are more susceptible to thermal inputs and rapid heating which places additional stress on fish populations. Any further loss of water treatment opportunities and recharge are not an acceptable option for the tribe.

3.1.1.3 Appendix G3 - Distribution of Fish

Chinook salmon have been documented upstream of the Montessori School to 356th St on the West Fork. This fact is continuously ignored and the tribe's data is not referenced anywhere in the DEIS.

3.10.1.1 Aquatic Species and Habitat

While it is true, fish are not present in any of the proposed alternative sites, water quality and quantity impacts can and will affect downstream fish populations. Pink, coho, chinook, steelhead and cutthroat occupy Hylebos Creek downstream of the project impact area.

The Midway Land fill site remains the Tribes preferred alternative as it has the least impacts to forests, no stream impacts and no wetland impacts.

Thank you for your consideration of these comments!

Sincerely,

Russ Ladley, Director
Puyallup Tribal Fisheries

These comments were sent to Hussein Rehmat at (206) 689-4828 or email Hussein.Rehmat@soundtransit.org, OMFSouth@soundtransit.org on April 19, 2021.

**Operations and Maintenance Facility South, Sound Transit
MARCH 2021 DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
Review Comments**

Organization:	WASHINGTON STATE DEPARTMENT OF ECOLOGY, TOXICS CLEANUP PROGRAM, NORTHWEST REGIONAL OFFICE
Date:	MARCH 5 - APRIL 19, 2021


ID	Section	Page	Paragraph/Table/Figure	Line	Comment	Column	Commenter's Name
1	Executive Summary, 3.13, Appendix D3 Section 2.6.2.3	ES-14, ES-24, 3.13-11, App D3 p. 30			What is the differential excavation volume of "full excavation of the entire landfill" compared to "full landfill excavation needed to develop the OMF"? Was an alternative considered for full excavation and replacement with clean fill? Replacement with clean fill would realize the full benefit of landfill excavation. Returning potentially impacted soil to the landfill excavator may result in placing contaminant source material back on the property. What would the differential construction and operating costs be for reused fill and clean fill? Appendix D3 Section 2.6.2.3 states "Environmental regulators may require any exhumed refuse to be disposed of at a permitted facility meeting current standards without the option to reuse on site." Would the decision on this requirement affect the OMF South location selection? Therefore, would a determination on soil reuse need to be made prior to site selection?	ECY	Mark Adams/Tanner Bushnell/Alan Noell
2	Executive Summary, Section 3.10.2.2, Section 3.11.2.2, App G3, Sect 4.1.2.1	ES-19, 3.10-13, 3.11-12, G3-73	Table ES-1		The Midway Landfill was completed with an impermeable 50-mil geomembrane cover. The overlying soil cap (12-inch sand, 12-inch topsoil) has limited storage potential for reducing peak drainage, so development of the OMF would have limited increase of impervious surfaces.	ECY	Alan Noell/ECY
3	3.11	3.11-12, 13	4-5		Is the platform description here current? Based on current design would all three Midway designs have similar access limitations to landfill management?	ECY	Tanner Bushnell
4	Appendix D1		34		A concern was expressed with mobilizing contamination though deep dynamic compaction. Areas of the landfill potentially containing liquid waste are a concern with regards to deep dynamic compaction.	ECY	Tanner Bushnell
5	Appendix D.2, Appendix D.3	p. 13 (pdf p 66), pp. 21-23 (pdf pp 126-128)	Section 2.1 (2/14/2020), Figures 2-1 to 2-3 (9/2020)		FWLE assumed 70% of screened landfill material would be reused (Interim Midway Landfill Preparation Memorandum, Draft 2, 2/14/2020). What was the actual reuse percentage? Was all material screened through 2-inch trommel reused? Was (Will) all 4-inch screen landfill material also (be) fed through a 2-inch trommel screen? What is the geotechnical criteria for reuse (e.g., percent organic matter). In the 2/14/2020 section, 50% reuse is assumed, but in the 9/2020 document, 40% reuse is assumed. What reuse percentage was assumed in the cost estimates? Was a sensitivity analysis performed? How significant of a driver is reuse percentage to the OMF costs?	ECY	Alan Noell/ECY
6	Appendix D.2	pp. 15 to 17 (pdf pp. 68-7)	Section 2.3		"The FWLE project has been allowed to reuse refuse material onsite; however, the quality of that material is better understood and the scale of that work is significantly smaller than that proposed for OMF South." How is the FWLE and OMF project landfill material expected to be different? Would older waste contain less daily cover? Did the FWLE contain more soil because it's located along the edge of the landfill and the vertical and horizontal limits of the landfill were variable? How much dangerous waste was disposed during FWLE? Is all OMF waste assumed to be Subtitle D waste? Would older waste potentially contain more hazardous waste? Would older waste be more compacted, moist, and dense?	ECY	Alan Noell/ECY
7	Appendix D.3	p. 3 (pdf p 108)	Section 1.3		The 9/2020 Conceptual Landfill Site Reuse Plan refers to 9 acres of refuse on WSDOT property in the ROW. Was this waste removed as part of the FWLE project, or is this waste outside of the FWLE that will be conveyed to SPU?	ECY	Alan Noell/ECY
8	Appendix D.3	p. 10 (pdf p 115)	Section 2.2		"If EPA approves the project under Superfund, the development process for Midway Landfill may be exempt from.....NEPA." Also the project may be subject to NEPA by FHWA if airspace crosses WSDOT land. Would an additional NEPA or SEPA EIS be required once the OMF South location is selected?	ECY	Alan Noell/ECY

**Operations and Maintenance Facility South, Sound Transit
MARCH 2021 DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)
Review Comments**

Organization:	WASHINGTON STATE DEPARTMENT OF ECOLOGY, TOXICS CLEANUP PROGRAM, NORTHWEST REGIONAL OFFICE
Date:	MARCH 5 - APRIL 19, 2021

ID	Section	Page	Paragraph/Table/Figure	Line	Comment	Column	Commenter's Name
9	Appendix D.3	p. 10 (pdf p 115)	Section 2.2		"the existing ROD may not need to be reopened, if during the course of OMF South construction, the integrity of the existing, in-place remedies are maintained." ST and SPU would need to negotiate new legal agreements with Ecology. The existing legal agreements would need to be amended to allow construction and to maintain environmental controls after construction. Work plans would need to be developed to maintain environmental controls during construction.	ECY	Alan Noell/ECY
10	Appendix D.3	p. 11 (pdf p. 116)	Section 2.2		The document states the Seattle-King County Department of Public Health will need to be provided the opportunity to review requested operational changes at the site. Public Health - Seattle and King County (PHSKC) does not permit the Midway Landfill. PHSKC informed Ecology on 3/15/2005 that they would no longer perform periodic inspections of the CERCLA site due to changes in program funding in King County Board of Health Code, Title 10, effective 12/21/2003. Ecology has primacy, and intends to coordinate with other regulatory agencies for future changes to the landfill.	ECY	Alan Noell/ECY
11	Appendix D.3	p. 24 (pdf p. 129)	Section 2.6.2		How do the predicted and actual observed densities and reuse percentages vary for the FWLE project at Midway. If these are carried forward to the OMF facility, how would they impact the costs?	ECY	Alan Noell/ECY
12	Appendix D.3	p 47 (pdf p. 152)	Section 3.4		How do risks to schedule in the September 2020 compare with FWLE project experience?	ECY	Alan Noell/ECY
13	Appendix D.4	pp. 13-15 (pdf pp. 174-176)	Sections 2.3.1 and 2.3.2		The site geology and hydrogeology sections reference the 2000 ROD and 2015 Five-Year Review, and provide no maps and cross-sections for interpretations. The ROD and Five-Year Review don't provide this detail. The document also includes a minor reference to the 1988 Remedial Investigation prepared by Parametrix. Please reference subsequent geology and hydrogeology interpretations for the site (July 2020 Parametrix report).	ECY	Alan Noell/ECY
14	Appendix D3, 2.6.1	22-23	Figure 2-2 and 2-3		Do the figures of the Hybrid and Full Excavation options depict reuse soil volumes accounting for the volume of mix-in soil (assuming the reused soil will require added soil to improve quality)?	ECY	Tanner Bushnell
15	Appendix D3, 2.6.2.2	28-29	Drilled Shaft and Slab Installation		This paragraph suggests for Hybrid 2, full excavation of soil beneath the building would remove the need for drilled shafts to support the building. Was the cost of Hybrid 2 with this arrangement calculated?	ECY	Tanner Bushnell
16	Appendix D3, 2.6.2.3	29			The acreage of exposed landfill for excavation purposes may be determined based on performance. Without an example project with similar infiltration restrictions, it would be difficult for Ecology to specify an acceptable uncapped landfill area.	ECY	Tanner Bushnell
17	HHRA Addendum	9			Ambient temperature typo.	ECY	Tanner Bushnell

WSDOT ENVIRONMENTAL DOCUMENT REVIEW COMMENT & RESPONSE FORM WITH INSTRUCTIONS

				FOR INTERNAL USE ONLY	Task Order #	
<insert name of project>				QA Reviewer: _____	Date: _____	_____
Title of Document		Type of Document		Version of Document		Date Released for Review
OMF South DEIS		Draft EIS				03/05/2021
Name and Affiliation of Document Author & Contact Information		<insert name of author>		<enter phone number>		
		<insert name of secondary contact>		<enter email address>		
Name and Initials of Reviewer(s) & Agency Represented		Jim Laughlin – JL, Ashley Carle = AC, Lindsey Jungbluth = JL, John Kleinkopf = JHK, Thomas A. Collins, P.E. (TAC) - WSDOT				
Date of Request		March 8,2021		COMMENTS DUE BY	<end of review cycle>	
				<input type="checkbox"/> Pass		<input type="checkbox"/> Resubmit

No.	Chapter	Resource Section	Page*	Line No.	Exhibit No.	Priority **	Reviewer Comment	Reviewer Initials	Author Response	Status Code***	Responder Initials	QC Back-check	QA Check
1	3	Water Quality	3	22	n/a	1	<insert your comment that relates to critical issues that require immediate attention>	xxx	<insert how the issue was resolved>				
-	-	Noise and Vibration	-	-	-	-	No Comments	JL					
1	ES	Visual & Aesthetic	21			2	ST also needs to address impacts to existing vegetation outside RCAs and restore according to the WSDOT Roadside Policy Manual.	JHK					
2	ES	Ecosystem	27			2	ST should evaluate impact to fish passage projects upstream of this project to ensure that this project doesn't negatively impact the restoration of access to spawning habitat upstream.	JHK					
3	1 and 2					4	It appears that parts 1 and 2 are repeated throughout this document	JHK					
4	3	Visual and Aesthetic	3.7-2 and 3.7-3	5	Table 3.7-1	3	Throughout section 3.7 there is no mention of the high awareness and high sensitivity viewer group that are persons driving for pleasure or tourists visiting an area to enjoy scenic features. They are instead just referred to as "I-5 and SR 99 Drivers", with no differentiation. This higher sensitivity viewer group needs to be considered in the EIS.	JHK					
5	3	Visual and Aesthetic	3.7-16		Figure 3.7-10	3	Description of figure in following paragraph omits high-sensitivity viewers such as tourists and sight-seers.	JHK					

Use Codes:

* Page No. or "G" for general comment about the section/chapter

** An explanation of the priority levels follows:

- 1 Critical issues requiring discussion/resolution
- 2 Substantive comment (including issues pertaining to Agency policy or precedent setting conclusions)
- 3 Factual or substantive issue (regarding legal principles or regulatory error that should be corrected prior to publication)
- 4 Editorial comment (suggestions to improve readability of the document/report or typographical error)

Page 1 of 3

*** Status Codes: A = Incorporated; B = Alternate Revision Proposed; C = Evaluated/Not Incorporated; D = Response to Question

WSDOT ENVIRONMENTAL DOCUMENT REVIEW COMMENT & RESPONSE FORM WITH INSTRUCTIONS

No.	Chapter	Resource Section	Page*	Line No.	Exhibit No.	Priority **	Reviewer Comment	Reviewer Initials	Author Response	Status Code***	Responder Initials	QC Back-check	QA Check
6	3	Visual and Aesthetic	3.7-17		Figure 3.7-11	3	Description of figure in following paragraph omits high-sensitivity viewers such as tourists and sight-seers.	JHK					
7	3	Visual and Aesthetic	3.7-17	17		3	Please address the impact to high-sensitivity viewers such as tourists and sight-seers.	JHK					
8	3	Visual and Aesthetic	3.7-23	14		4	The phrase ", or other features to help screen views..." should be spelled out more specifically or examples of what "other features" could be.	JHK					
9	3	Visual and Aesthetic	3.7-23	17 – 25		2	This paragraph is implying that RCA mitigation requirements are synonymous with vegetation replacement requirements per the WSDOT Roadside Policy Manual. They are not the same thing. Impact to RCAs cannot be mitigated in the same way as roadside vegetation is. The primary mitigation method for RCAs is avoidance of that impact. Restoration of roadside vegetation should be addressed separately from RCAs.	JHK					
10	3	Visual and Aesthetic	G			4	It seems that section 3.73 should have more description of the mitigation measures that are described in the visualizations. One thing that muddles the assessment of the long-term impact analysis is the assumption that the visualizations' shown mitigation measures will be pursued. I think it makes more sense to show the before impact, the impact visualization and then in the Potential Mitigation measures show the impact visualization with the mitigation measures.	JHK					
11	3	Visual and Aesthetic	3.7				The mitigation measures should be spelled out in more detail to align with the visualizations. The public will view this and think this is exactly how it will look. If the visualizations are just approximate, this needs to be spelled out in the document.	LJ					
12	ES	Executive Summary	iii	n/a	n/a	3	Add Land Acquisition per FWLE Land Exchange Agreement, by WSDOT	TAC					
13	Multiple	All	G	n/a	n/a	3	Multiple figures in document show Midway Landfill Alternative "Potential Construction Limits" to edge of I-5 lanes. The WSDOT SR 509 Completion Project will likely be constructing work in the area between 2024 and 2028, so it is not likely that WSDOT will allow Sound Transit temporary use of the area from I-5 to the WSDOT Compatibility Line that exists on the east side of the FWLE guideway.	TAC					
14	3.7	Visual and Aesthetic Resources	14	n/a	n/a	3	Figure 3.7-7 shows an aerial guideway at the Midway Landfill. Sound Transit is constructing a retained fill, at-grade guideway now, not an aerial guideway through the majority of the Midway Landfill.	TAC					

Use Codes:

* Page No. or "G" for general comment about the section/chapter

** An explanation of the priority levels follows:

- 1 Critical issues requiring discussion/resolution
- 2 Substantive comment (including issues pertaining to Agency policy or precedent setting conclusions)
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- 4 Editorial comment (suggestions to improve readability of the document/report or typographical error)

Page 2 of 3

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General Manager's Office

201 S. Jackson Street
KSC-TR-0415
Seattle, WA 98104-3856

4/19/2021

Hussein Rehmat
OMF South Project
Sound Transit
401 S. Jackson St. Seattle, WA 98104

(by electronic mail: OMFSouthDEIS@soundtransit.org.)

Re: King County Metro Transit's comments on the Sound Transit Operations and Maintenance Facility South Draft Environmental Impact Statement

Dear Mr. Rehmet:

Thank you for the opportunity to review and comment on the Sound Transit (ST) Operations and Maintenance Facility South (OMF-S) Draft Environmental Impact Statement (DEIS).

King County Metro (Metro) would like to thank Sound Transit for their continued leadership on providing regional transit service. As population growth and traffic congestion have continued to increase in the Puget Sound region, we recognize the need for transportation improvements that increase mobility options and support transit throughout the Puget Sound region.

Metro is primarily concerned with impacts to transit in the vicinity of the OMF-S project, regardless of alternative. All alternatives analyzed in the DEIS are near or adjacent to SR 99. Any use of SR 99 as a haul route during construction has the potential to impact Metro's operations along that corridor. The magnitude of work required for the Midway Landfill site alternative would likely have the greatest impact on Metro's operations.

Metro has the following comments on the ST OMF-S DEIS: Include transit specifically in the mitigation section under transportation and include transit in the construction transportation management plan.

The report should clarify how LOS is measured/defined for intersections under two-way stop control (TWSC). Since this is defined differently from signalized intersection LOS, the actual NB/SB thru traffic impacts at 246th should be noted in the DEIS to help fully understand why the Midway site alternative causes the delay/LOS at 246th to degrade.

Hussein Rehmat
Page 2

The report should clarify potential construction truck traffic impacts at 272nd, Kent Des-Moines Rd, and the northbound HOV lane, as well as potential impacts of a truck acceleration/deceleration lane and/or any long-term mitigation at 246th (signalization, u-turns at 252nd, etc.) to the northbound HOV lane (pg. 3.2-42).

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

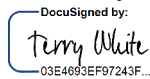
Lori Burchett
Transportation Planner
King County Metro Transit
King Street Center
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Thank you for this opportunity to comment on the DEIS. The OMF-S will provide significant benefit to the regional transportation network and Metro will continue to work with Sound Transit in our role as a Consulted Agency. We believe that implementing the recommendations above will disclose important information needed to develop a balanced Preferred Alternative and to assist the public and decision-makers in selecting the best option.

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

Sincerely,

DocuSigned by:

03E4693EF97243F...

Terry White, General Manager
King County Metro Transit Department

cc: Lori Burchett, Transportation Planner, Metro Transit
John Greene, Environmental Planner, Metro Transit



City of Des Moines

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April 15, 2021

OMF South, c/o Hussein Rehmat
Sound Transit
401 S Jackson Street
Seattle WA 98104

Subject: DEIS Comments for the Operations and Maintenance Facility South Project

Dear Mr. Rehmat:

The City of Des Moines is pleased to provide our comments on the Draft Environmental Impact Statement (DEIS) for the Sound Transit Operations and Maintenance Facility South (OMFS) Project.

The City of Des Moines is committed to working with Sound Transit and the cities of Kent and Federal Way to ensure the OMFS supports Federal Way Link Extension and the expansion of light rail to Tacoma, balances local and regional interests, does not adversely affect Highline College or the neighborhoods in the South Des Moines/Midway area, does not compromise developing a vibrant KDM station area and business district along SR-99, minimizes impacts on existing businesses and residents, supports municipal services through maintenance and growth of sales and property taxes, and maintains the living, working and shopping convenience and livability of our respective Midway neighborhoods. Although estimated costs are highest for the Midway Landfill alternative, the City supports the productive reuse of the Midway Landfill site and that its use avoids impacts associated with the two Federal Way alternatives.

In summary, the comments on the DEIS for the OMFS at the Midway Landfill are as follows:

Transportation

- The traffic study to be developed should include LOS analysis during construction/hauling activities and post construction of the OMF for the following intersections along SR-99: Kent-Des Moines Road (KDM), College Way/S 236th, S 240th, S 260th and S 272nd.
- LOS analysis would identify any potential mitigation required at Des Moines intersections or affecting City of Des Moines streets.

The Waterland City

Mr. Hussein Rehmat

Page Two

April 15, 2021

- Haul routes will need to be reviewed for potential mitigation and restoration.
- The traffic study should identify if any new PM peak hour trips are added to the Des Moines Street system.

Ecosystem and Water Resources

- If the Midway Landfill site is selected, include the City of Des Moines in the review of the Drainage Site Plan, Technical Information Report, and SWPPP.
- The City of Des Moines should also be identified as an affected agency for compliance review of the NPDES Stormwater Discharge Requirements.
- Reevaluate impacts from increased impervious surface to streams and stream buffers. The City does not understand the "0" for Stream and Stream Buffer impacts (pp. ES-18 and ES-27) for the Midway site given the amount of impervious surface being added.

Construction Impacts

The following impacts will need to be more fully developed or identified in the FEIS for the Midway site if it is selected as the preferred alternative:

- Construction timeline.
- Community/business impacts due to the estimated 570 truck trips/day over 4.5-5.5 year site preparation period.
- Potential human health risks to both construction workers, employees and community from potential release of contaminated air, soil or water.
- Unknown risks associated with the landfill/superfund site that could add additional time, and construction and O & M costs.

We look forward to our continued collaboration with Sound Transit. Please feel free to contact me or City staff if you have questions about our comments.

Sincerely,



Susan Cezar LEG, Chief Strategic Officer
SEPA Official

The Waterland City



ECONOMIC & COMMUNITY DEVELOPMENT

Kurt Hanson, Director

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April 15, 2021

OMF South, c/o Hussein Rehmat
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Sound Transit Light Rail Operations and Maintenance Facility – South Draft Environmental Impact Statement Comments

Dear Mr. Rehmat:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Sound Transit (ST) Light Rail Operations and Maintenance Facility – South (OMF-S) and applicable appendices.

As previously stated by the City of Kent, the City of Kent does not object to the OMF-S facility being located within the city provided the OMF-S is constructed on the Midway Landfill site. The city provides the comments below on the three alternatives being analyzed in the DEIS.

Figure ES-8 – Illustrated Metrics: Preliminary Capital and Operating Costs Estimates - Why the increased annual cost annual operation at the Midway Landfill compared to the other two sites? A 10% increase in costs at the Midway Landfill site should be explained. This has not been identified in the DEIS and the public should be provided an opportunity to comment the increased maintenance cost.

Sec. 1.1 – Purpose of the Project - The purpose and need should identify which ST expansion projects requires the construction of the OMF-S facility. Is the OMF-S facility needed for the Federal Way Link Extension (FWLE) project? A portion of the FWLE project is funded with ST3 funds.

Sec. 2.6 – Funding and Conceptual Cost Estimates - The DEIS identifies conceptual cost estimates that that vary greatly between the Midway Landfill site and the other sites being considered. A detailed breakdown of the assumed costs associated with each alternative should be included in the DEIS to fully understand the alternatives being considered.

Sec. 2.7.2 – Next Steps and Schedule: Benefits and Disadvantages of Delaying Project Implementation - The FWLE project was extended as a part of ST3. Would the delay of the OMF-S impact the level of service anticipated once the FWLE project was completed?

Sec 3.2.1.2 – Transportation: Impact Thresholds– The City of Kent does not agree with the mitigation threshold of +10 seconds. Mitigation may be required based on a lower delay threshold.

Sec 3.2.1.2 – Transportation: Impact Thresholds– The second paragraph needs to be clarified. Is the mitigation threshold LOS E for SR 99 and LOS F for the other streets that are not HSS or state highways?

Sec 3.2.1.2 – Transportation: Impact Thresholds– The City of Kent’s current (2021) Transportation Master Plan LOS for SR 99 is LOS D or better.

Sec 3.2.1.4 – Transportation: Transit – Metro Route 166 was eliminated in September 2020. Portions of the route are now served by Route 165.

Sec 3.2.2.1 – Transportation: Environmental Impacts - Kent’s future transportation projects have changed with the adoption of the new Transportation Master Plan located at <https://www.kentwa.gov/city-hall/public-works/transportation-and-streets/transportation-planning>. Please review and revise as necessary.

Sec. 3.2.2.1 – Transportation: Environmental Impacts - Due to the impacts of construction on local streets, if the Midway Landfill site is selected for the OMF-S, South 259th Street will require a full width overlay.

Sec. 3.2.2.1. – Transportation: Environmental Impacts, Non-Motorized Network - The updated Transportation Master Plan (TMP), adopted in March 2021, details bicycle and pedestrian standards for Kent’s transportation network. Below bicycle and pedestrian standards for the roadways in the Midway Landfill Study Area. For the more details on these standards, please see chapter 5 of the TMP located at <https://www.kentwa.gov/home/showpublisheddocument?id=16632>.

- SR 99 – S 240th St to 1st driveway south of 244th St
 - Bicycle – LOS 1
 - Pedestrian – Downtown/TOD Standard
- SR 99 – 1st driveway south of 244th St to S 259th St
 - Bicycle – LOS 1
 - Pedestrian – Areas of High Pedestrian Activity
- S 259th St – SR 99 to West Hill Mobile Manor Driveway
 - Bicycle – LOS 1
 - Pedestrian – Areas of High Pedestrian Activity
- S 259th St – West Hill Mobile Manor Driveway to east study limits
 - Bicycle – LOS 1
 - Pedestrian – Other Arterials
- S 240th St – All in study area
 - Bicycle – LOS 2
 - Pedestrian - Downtown/TOD Standard
- S 252nd St from SR 99 to 29th Ave S; 29th Ave S from S 252nd St to S 259th St; S 244th from SR 99 to just west of I-5; and new facility just west of I-5 between S 240th and S 244th St
 - Bicycle – LOS 2

Sec 3.2.2.2 – Transportation: Environmental Impacts, “Intersections” #2 (SR 99/S 244th St), #3 (SR 99/Midway Mobile Home Park), and #4 (S 246th St) are commercial driveways on the east side of SR 99 and do not need to be analyzed as intersections unless there is a direct impact on a public right-of-way intersection on the west side.

Sec 3.2.2.2. – Transportation: Environmental, Long Term Impacts - The location of the gates will need to be designed so expected queues do not extend into the public right of way assuming the likely usage and an additional safety factor.

Sec 3.2.2.2 - Transportation: Environmental, Long Term Impacts, Parking: Kent City Code 15.15.310 requires the following: *In order to provide adequate off-street parking, the lead agency for an HCT facility shall be required to provide a parking study, prepared as part of an EIS or separately, for each station, demonstrating that the parking demand will be satisfied.* This standard would apply to the OMF-S facility. Please indicate when this requirement would be fulfilled.

Sec. 3.2.2.3 – Transportation: Construction Impacts – Given the peak number of construction vehicles per day for the Midway Landfill alternatives, particularly the hybrid and full excavation alternatives, consultation with the Washington State Department of Transportation should be completed to consider options to access directly to I-5 similar to access during the landfill waste removal during the construction of the FWLE. Just north of the existing stormwater pond on the Midway Landfill, Structure B of the FWLE project has enough vertical separation to allow trucks to pass underneath and access I-5.

Figure 3.2-8 – Existing Annual Average Daily Traffic Along Truck Routes: Midway Landfill Alternative - This figure identifies the proposed haul route for the Midway Landfill Alternative. Considerable truck traffic is proposed. If a Midway Landfill option is chosen, will be required to complete a 2-inch minimum overlay on all haul routes within Kent's jurisdiction. In addition, a direct I-5 connection should be considered, particularly for the hybrid and full excavation options. Structure B within the FWLE project, just north of the Midway Landfill will be elevated enough to allow for a future road, therefore an alternative to access I-5 can be evaluated.

Sec. 3.3.2.3 – Construction Impacts – Temporary Construction Easements (TCEs) should be identified in the DEIS on a map. How will these TCEs impact traffic volumes and access to city streets. These need to be considered in the analysis.

Sec. 3.4.1.1 – Land Use: Affected Environment, Midway Landfill Alternative - The Midway Landfill would eliminate some commercial businesses along Pacific Highway South which are also shown on Figure 3.4-1. These commercial businesses should be discussed and specifically identified section 3.4.1.1.

Sec. 3.4.2 – Land Use: Consistency with Regional and Local Comprehensive Plans and Zoning - This type of facility is anticipated in KCC 15.04.060, allowed via a conditional use permit (CUP), and so would not be a fundamentally inconsistent land use. Any design-specific impacts would need to be mitigated as part of the CUP approval.

Sec. 3.4.3.3 – Land Use: Construction Impacts – The DEIS estimates a Midway Landfill alternative would take up to 8 years to complete. What is the degree of uncertainty in these estimates? How would the construction duration impact residents to the south, adjacent to S. 259th Street?

Table 3.5-5 – Economics: Property Acquisition Impacts on Businesses and Employees - This table identifies the four (4) businesses that would be displaced, with ten (10) total businesses affected. Please provide a complete list of the business names impacted for the Midway Landfill Site options.

Table 3.5-5 – Economics: Property Acquisition Impacts on Businesses and Employees - For this table Note 3 states employee displacements are based on building size and business type. The

number of businesses where employees could be displaced are not that great the actual number can be identified. Numbers on the table appear to be absolute and not necessarily representative of the actual number of displacements.

Sec. 3.6.2.3 – Social Resources, Community Facilities, and Neighborhoods: Construction Impacts - The Midway Landfill Alternative might also impact the residential properties along the southern edge of the Midway Landfill. Provide a description of how these properties would be impacted, particularly since options at the Midway Landfill could take up to eight years for construction.

Table 4.5-1 – Past, Present, and Reasonably Foreseeable Future Actions and Figure 4.5-1 – Past, Present, and Reasonably Foreseeable Future Actions - Both the WSDOT SR509 (Map ID #1) and ST FWLE (Map ID#2) are long linear projects. As depicted on Figure 4.5-1. These projects should be clearly illustrated on the map.

GENERAL COMMENT - OMF-S appears to be larger than the Forrest Street OMF and the OMF-E. The alternatives in the DEIS appear to have expanded since earlier discussions with ST. Has the size of the OMF-S expanded and if so, please provide an explanation of why the expansion has occurred? If there is expansion, how much of the expansion is intended for the expansion of light rail north of Seattle?

GENERAL COMMENT – Many assumptions were made with each of the alternatives. A complete list of assumptions for each site alternative should be provided for the public and decision makers to review and understand during the comment period.

Appendix C - OMF-S DEIS Conceptual Design Drawings

Midway Landfill Option 2 – Hybrid (Sheet 5) vs. Midway Landfill Option 3 Total excavation. Why include deep dynamic compaction in Option 2 sheet 5? Based on the cross section for the hybrid option, why add deep dynamic compaction when the full excavation option does call out 3-foot over excavation from the 1966 topography? Otherwise these are similar from an excavation perspective. Can the deep dynamic compaction be eliminated for a cost savings and/or a reduced construction time?

As required by Kent City Code section 15.15.020, the design requirements of KCC 15.15 shall apply to this site. An analysis of the site requirements from this section should be included.

Appendix D2 Interim Midway Landfill Preparation Memorandum

Sec. 2.1 - Earthwork Process, page 14, Line 16 states the active excavation and hauling are assumed to be 12-hour shifts but may be 16-hours with two shifts. Is the construction duration for these alternatives based on a 12-hour shifts or 16-hour shifts? Both should be represented in the DEIS. Would 16-hour shifts decrease construction costs? Also, what would the reduction in the construction duration be with 16-hour shifts?

Sec. 2.1 - Earthwork Process, page 14, Line 20 states excavation is assumed to be permitted only between May 1 and September 30. This is a significant assumption. This would have significant impact on construction duration and the cost of construction. Which agency makes this final determination and how can this be resolved prior to the decision making by the Sound Transit Board?

Sec. 2.2 - Drilled Shaft and Slab Installation, Page 14 line 36 states that drilled shafts are assumed to be 10-feet in diameter. These are quite large shafts and potentially very

expensive. This is a significant assumption. Are these the largest shafts that would be required? What is the difference in cost and construction duration if the columns were a smaller diameter? What information is needed to determine if smaller diameter shafts could be used and what are the cost savings? How can this be determined to refine potential construction costs prior to decision making by the Sound Transit Board?

Sec. 2.5 - Construction Phasing and Material Reuse, page 18, line 27 assumes a 5-acre open refuse area that will be limiting for space demands. How was the 5-acre open refuse area assumed and who makes that final determination? This might be able to be larger. Which agency makes this final determination and how can this be resolved prior to the decision making by the Sound Transit Board? If this can be larger, is there a potential reduction in cost and construction duration for Midway Landfill alternatives?

Sec. 4.0 - Schedule, Page 33, Line 22, second schedule consideration states there may be an advantage to separating out. A description of the advantage should be included in the analysis.

Appendix D3 Conceptual Landfill Refuse Plan

Sec. 2.6.1 – Why is deep dynamic compaction proposed for the hybrid option but not the full excavation option when material will be removed and reused? See Figures 2 and 3.

Sec. 2.6.2.2 - Drilled Shaft and Slab Installation, Page 26, Line 8 states that the grid spacing for the drilled shafts changed from the 100-ft by 100-ft spacing due to land landfill optimization process. Line 2 identifies a 35-foot by 70-foot grid. What information led to this change and what is the impact to construction cost and duration?

Sec. 2.6.2.3 – Environment Considerations During Construction, Page 30, Line 22 discusses re-use of screened soils from the landfill. How and when will this information be determined? This could have an impact on the cost and duration of construction.

Sec. 2.6.3.1 – Truck Haul Routes – Are construction haul routes described in the documents for waste removal or all construction vehicles? Specifically, if the Midway Landfill site is selected, and concrete trucks are locally sourced, what is the route for the concrete trucks? City streets included in the haul routes for concrete trucks should receive an overlay at the conclusion of the project.

Sec. 2.6.3.2 – Level of Service – If the Midway Landfill site is selected, and concrete trucks are locally sourced, how will the quantity of the concrete trucks impact traffic patterns? Does the data in Table 2-5 include concrete trucks?

Appendix D4 Midway Landfill Human Health Risk Assessment

GENERAL QUESTION - For Contaminants of Interest, are there any potential mitigation measures that can be implemented during construction to mitigate any potential human health risks for all options at the Midway Landfill site?

Appendix G1 - OMF-S DEIS – Transportation Technical Report

Sec. 4.1.1.1 – Please updates with Kent’s current Transportation Master Plan.

Sec 4.1.x – “Intersections” #2 (SR 99/S 244th St), #3 (SR 99/Midway Mobile Home Park), and #4 (S 246th St) are commercial driveways on the east side of SR 99 and do not need to be analyzed as intersections unless there is a direct impact on a public right-of-way intersection on the west side.

Sec 4.2.1.x – The location of the gates will need to be designed so expected queues do not extend into the public right of way assuming the likely usage and an additional safety factor.

Sec 4.2.1.5 – Why would parking be lost on S 252nd St.? The project would be required to construct standard frontage improvements which may include width for on-street parking.

Sec 4.2.2.1 – Converting the median to a southbound left-turn in the 24600 block will require WSDOT approval (RCW 46.61.020 (13)). Kent will require mitigation for the lost landscaping in the median.

Sec 4.6.1 – With this much truck traffic, S 272nd St. will need post-construction restoration.

Potential Funding Resources

The March 2021 *Center for Creative Land Recycling* newsletter included some articles that may be a resource for funding or resources that could be used should the Midway Landfill site be selected. The website for the *Center For Creative Land Recycling* can be found at <https://www.cclr.org/>. Also, the articles in the March 2021 Newsletter are listed below:

- 1) Vision to Action: Engaging Communities for Better Redevelopment - <https://www.cclr.org/sites/default/files/V2A%20Fact%20Sheet%20%2B%20Case%20Studies%20%283%29.pdf>
- 2) Real Estate Technical Assistance Opportunity - https://www.cclr.org/cre-technical-assistance?mc_cid=01cd720724&mc_eid=b4c1148da3
- 3) Targeted Brownfields Assessment Request in Region 10 (EPA) - https://www.epa.gov/brownfields/targeted-brownfields-assessment-requests-region-10?mc_cid=01cd720724&mc_eid=b4c1148da3
- 4) Power Up Your Program:
Using the Brownfields Community Capacity Assessment Tool Webinar - https://www.ksutab.org/education/webinars/details?id=452&mc_cid=01cd720724&mc_eid=b4c1148da3

Thank you again for the opportunity to comment on Draft Environmental Impact Statement for the proposed Operation and Maintenance Facility-South.

Sincerely,



Kurt Hanson
Economic and Community Development Director

c: Dana Ralph, Mayor
Derek Matheson, Chief Administrative Officer
Chad Bieren, P.E., Public Works Director
Matt Gilbert, Economic and Community Development Manager
Kelly Peterson, City of Kent Liaison to Sound Transit – FWLE



OFFICE OF THE MAYOR
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www.cityoffederalway.com
Jim Ferrell, Mayor

April 6, 2021

Sound Transit Board
401 S Jackson Street
Seattle, Washington 98104

Re: Operations and Maintenance Facility – South Draft Environmental Impact Statement

Dear Sound Transit Board Members,

The City of Federal Way's Mayor and Councilmembers have reviewed the findings of the Draft Environmental Impact Statement (DEIS) of the potential sites for the Operations and Maintenance Facility South (OMF-South), conducted a Council Study Session with Sound Transit staff, have heard from our community, and have reviewed technical comments prepared by City staff. Our review has affirmed our belief that the Midway Landfill needs to be identified as the preferred alternative and ultimately be the site selected for this facility and the two Federal Way sites should be removed from further review.

We recognize that Sound Transit is building new transit infrastructure to support sustainable growth in our region. In doing so, Sound Transit should not make a decision that will have a lasting negative impact. Environmental review by way of NEPA and SEPA was implemented at the Federal and State levels to evaluate the impacts of government decisions in order to prevent them from causing unnecessary impacts to communities like those that the OMF-South will have in Federal Way. The 336th Street site will remove a church, a school, and a daycare that serve our community as well as residences and other businesses. The 344th Site will remove multiple churches, 20 residences, and a dozen businesses, including the Garage Town community that the DEIS presents as a single business but is in fact made up of over 60 unique owners and Ellenos Real Greek Yogurt, who recently invested millions of dollars in improvements to their regional and growing business. The Midway Landfill will displace significantly fewer businesses and employees, no residents, and no civic institutions.

The DEIS presents a clear preferred alternative when the impacts are considered and it is the Midway Landfill. In accordance with NEPA and SEPA, cost is not an Environmental Impact, however the prepared DEIS clearly shows that Sound Transit has elected to include costs within the decision matrix. In considering the overall impacts and a robust environmental review process, cost cannot be a factor in your decision, the impacts to the Federal Way sites are significant and will be far too detrimental to our community.

The DEIS inaccurately assumes that the City of Federal Way will approve vacating public roads, that City staff will modify our Development Standards to permit this development that would not be approved of other public or private developers, or that adequate mitigation to these items could be found. We strongly object to Sound Transit's finding of regulatory certainty on behalf of the Federal Way sites by unilaterally

assuming City approval. Additionally, Sound Transit does not have adequate authority to commit the City of Federal Way to a future legislative act in vacation of opened and utilized public right-of-way.

The City and Sound Transit have a shared interest in the success of the light rail system and have enjoyed a successful partnership on the Federal Way Link Extension to date. We have seen and heard from Sound Transit a willingness to look to the future and make the decisions that are in the best interest for the future of this region. In this spirit, we ask that the Sound Transit Board remove the two Federal Way locations and select the Midway Landfill as the preferred alternative and site of the new OMF-South.

City staff will provide additional technical comments under separate cover.

Sincerely,


FEDERAL WAY MAYOR AND CITY COUNCIL



Jim Ferrell, Mayor



Susan Honda, Council President



Lydia Assefa-Dawson, Councilmember



Gregory Baruso, Councilmember



Hoang V. Tran, Councilmember



Leandra Craft, Councilmember



Martin A. Moore, Councilmember



Linda Kochmar, Councilmember

CC: Peter Rogoff, CEO, Sound Transit
EJ Walsh, P.E., Public Works Director
Brian Davis, Community Development Director
Ryan Medlen, Sound Transit Liaison



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Jim Ferrell, Mayor

April 19, 2021

By Email

Mr. Curvie Hawkins
Mr. Hussein Rehmat
Sound Transit
401 S Jackson Street
Seattle, WA 98104
OMFSouthDEIS@soundtransit.org

RE: Operations and Maintenance Facility – South DEIS City of Federal Way Technical Review Comments

Dear Mr. Hawkins and Mr. Rehmat,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the Operations and Maintenance Facility South (OMF South). As you are aware, two of three sites that Sound Transit is considering are within the City of Federal Way. We have appreciated the collaborative nature of the relationship Sound Transit staff looks to have with the City.

The City has taken an official position on the OMF South in a previously provided letter signed by the Mayor and full City Council dated April 6, 2021. This second letter focuses on technical comments and input to help the EIS be finalized and published as the most accurate document possible.

City staff understands that this project is not intending to use Federal funds and therefore not subject to NEPA at this time and that the DEIS is issued as result of Sound Transit issuing a Determination of Significance under SEPA. In light of this and pursuant to WAC 197-11-550, many of our comments can be regarded as requests for clarifying or additional information.

However, items with greater significance are clearly identified as a request for alternative methodology or specific mitigation measures that will be necessary to allow the City to permit the project in the event that one of the locations within Federal Way is ultimately identified.

Construction Cost and Schedule

The DEIS prominently presents cost and construction schedule information in the executive summary, body of the DEIS, and in presentations to the public on the same level as displacements, ecological impacts, and other environmental impacts. Cost to the developer is not a factor of consideration in SEPA reviews or an applicable environmental element in the WAC that has to be considered. The DEIS does not clearly identify the basis for consideration of construction costs so City staff is unable to provide comment beyond that it is not an environmental impact and should not be considered in the EIS. By putting forth these three alternatives in the DEIS, Sound Transit has identified them as reasonable alternatives and should consider them against their environmental impacts alone.

If Sound Transit determines inclusion of costs is appropriate and should remain part of the EIS, then the discussion must be comprehensive for all three alternatives. High-level construction cost information was included for the Midway Landfill, but not for the other alternatives. Comparable evaluation of the relocation, property acquisition, and environmental mitigation would be necessary to understand how cost factors into the analysis being performed in the EIS. If such an analysis is not complete, then it should be noted why no further study is required and the actual costs should be removed and discussed at a summarized, conceptual level only. Other questions left unanswered with regards to cost include:

- Is Sound Transit limiting their ability to seek Federal assistance by building the mainline as part of a project not subject to NEPA?
- Why is the additional maintenance cost for the Midway site not addressed?
- What is the estimated cost of the mainline construction? Alteration to the BPA Power Lines?
- Why does the Midway Landfill Site consider additional costs for settlement even on the option to completely remove the waste from the site?
- The operating cost difference is not addressed in the DEIS, what is the reason for this difference?

As with the discussion on costs, schedule is not a typical environmental element. With no basis for inclusion provided, all discussion about construction schedule should be removed from the DEIS or considered comprehensively for all three site alternatives. As discussed under the City's comments on transportation impacts, both Federal Way alternatives require improved public

rights-of-way to be vacated. The vacation process is expected to take 18-24 months and is a Council legislative action. This will add significantly to the timeline.

The following are additional comments relating to cost and schedule:

Page 2-24

- Work hour variance approvals will be required for the construction schedule presented to be allowed in Federal Way.

Page 2-29

- Section 2.6 just covers cost estimates. Where is a discussion on funding in this section?

Page 2-31

- Do these dates consider Sound Transit's realignment effort?
- Based on outlined schedule, 2024 is not a realistic start of construction with required ROW vacations.
- Table 2.7-1 does not present a feasible schedule including the Right of Way vacation process for FW. Sound Transit needs to review that and incorporate into schedule. Right-of-way vacation would need to start approximately early Summer of 2021 for the proposed schedule to be accomplished.
- The requirements, mitigation and processes for Right of Way vacation are not identified or included within the DEIS.

Transportation Impacts

Both site alternatives in Federal Way, 336th St. and 344th St., remove improved public rights-of-way and a north-south road connection. 341st Pl., 344th St., and 20th Ave. S., are all identified in the Federal Way Comprehensive Plan as minor collectors (refer to Map III-3). Additionally, they are each a bicycle route identified in Map III-16. The DEIS indicates the shared markings are an unfunded project when the project is currently out to bid. Additionally, the trip distribution model presented does not redistribute trips from the roads proposed for vacation.

We have appended to this letter an attachment that includes a number of comments and corrections to the Technical Appendix G1. These appended comments are meant to aid in improving the technical report to better inform the analysis of the EIS. The mitigation requested in the body of this letter takes precedence in our ability to permit the project.

The following comments relate to Section 3.2 of the DEIS:

Page 3.2-5

- Level of Service is not the basis for defining impacts associated with right-of-way vacations. Refer to FWRC Chapter 4.20.

Page 3.2-7

- While Section 3.2.1.4 may be correct that the Midway Landfill is primarily served by routes on Hwy 99, the Federal Way sites include Pierce Transit routes split between 336th St., Hwy 99, and 16th Ave S. King County only has a commuter route on Hwy 99.

Page 3.2-11

- Regarding Section 3.2.1.6, the City is in the process of updating on-street parking restrictions in the area and the rule will be in effect this summer.
- Regarding Section 3.2.1.7, the number of collisions is only one part of the safety measures the City uses and is meaningless by itself. For intersections, the City uses collision rate (collisions per million entering vehicles); societal cost; and severity rate (societal cost per million entering vehicles). The DEIS should use these measurements as they are more useful to determining whether mitigation is needed and will ultimately be required as part of Concurrency permitting of the sites.

Page 3.2-14

- Verify that Pierce Transit will continue their service long-term. They have stated they intend to truncate their lines at the South Federal Way Station when TDLE opens.
- Installation of shared lane markings for bicycles is currently out to bid.

Page 3.2-15

- Why not use a travel demand model for more realistic trip assignment, especially when roadway closures would redistribute trips?

Page 3.2-23, Table 3.2-8

- Standard v/c is 1.0 at unsignalized intersections in Federal Way.
- V/c needs to be reported for all intersections in Federal Way.

Page 3.2-39

- The City can provide actual traffic counts upon request and Table 3.2-17 as well as other sections of the report can be updated to provide more accurate information. AADT is not typically presented as a range.

Page 3.2-41

- All signage is required to be reflective regardless, so providing it is not a mitigation measure.

Page 3.2-42

- Section 3.2.3 is incorrect for the Federal Way sites as the facility has long-term planning and operational impacts by not providing a road network consistent with City Development Standards and removing existing roads incorporated into the Comprehensive Plan.

Alternative Methodology - Transportation

The trip distribution modeling needs to address the redistribution of existing trips based on the proposed conditions. Further analysis and appropriate mitigation is required as part of any request for a right of way vacation under Federal Way code.

Mitigation - Transportation

No mitigation for the loss of the roads or alternate travel routes is identified nor do the conceptual designs meet Federal Way Development Standards for vehicular block perimeter. The City of Federal Way requires the project mitigate all public roadways being vacated by incorporating roadways of identical functionality for vehicles, pedestrians, and bicycles in a manner that complies with the City's block perimeter requirements and Comprehensive Plan.

Public Safety

The DEIS correctly states that the City of Federal Way has expressed concerns over the potential effects on response times from either the 336th St. or 344th St. alternatives. 20th Ave. functions as a bypass road for Pacific Highway and 16th Ave. that provides an alternative north-south route for officers who may be responding from anywhere in the City. Section 3.14 states that "it is not possible to accurately determine how the road closure would affect their response time." While then concluding that "the closure [of 20th Avenue] would likely have very little impact on their response time to the area".

We disagree that this impact to response times is insignificant. Given that this issue was identified prior to publication of the DEIS and no mitigation is provided, there must be an analysis to justify the findings in the EIS.

Mitigation – Public Safety

Incorporate a replacement north-south connection parallel to 16th Ave and Pacific Highway for emergency vehicle response. This mitigation overlaps with the requested mitigation for the impacts to the City road network.

Economic and Fiscal Impacts

The following comments relate to Section 3.5:

- Sound Transit should provide actual counts for employee displacements rather than estimates.
- Property taxes as a snapshot in time should be easily calculable as they are published every tax year by the King County Assessor's Office.
- The DEIS does not consider the opportunity cost difference between the three sites. As a landfill and Superfund site, the Midway site will likely have a low opportunity cost. City staff contracted with the FCS Group to assess the opportunity cost of the Federal Way's sites. The findings include that the 344th St. and 336th St. sites have 31.4 and 21 acres of vacant or redevelopable land respectively based on King County buildable lands guidance. As the OMF-South will represent a permanent change of land use to public/institutional, the diminished capacity for population and employment growth for the region that change in use represents needs to be considered.

Page 3.5-8, Table 3.5-5

- The City had the FCS Group review potential employment. Their review found general concurrence with the baseline for the estimated employees directly displaced, but found the impact of those jobs lost would cause a significant number of additional jobs to be lost in the area. In total, the OMF-South will result in \$30 - \$50 million in lost economic output depending on what site is chosen.
- We understand the information presented to be based on the conceptual 10% OMF-South plans. However, the DEIS needs to acknowledge that any change to the design that expands the footprint will not be inconsequential. Environmental mitigation, additional transportation improvements, and stormwater management are all risks to the footprint expanding. The immediate area surrounding either Federal Way site alternative supports over 300 additional jobs.

Page 3.5-9

- Reference to fiscal impacts as small is a matter of opinion. The DEIS language should be neutral.

- Clarify whether the proportion of assessed valuation is based on assessed valuation or taxable valuation. As all land and buildings typically have an assessed valuation even if they are tax exempt, such as government buildings or developments receiving special tax exemptions. Taxable valuation is more relevant to assessing economic and fiscal impacts.

Alternative Methodology – Economics

- Provide an accurate count for the purposes of employment displacement.
- Consider indirect and induced job loss, as well as economic output loss.
- Address the level of risk and the potential consequences to the OMF-South footprint expanding as design progresses. Further plan development beyond 10% may be required to provide this information and an accurate comparison with the three sites.
- Evaluate and assess the impact to growth capacity and the economic opportunity costs for the three alternative sites. The City has evaluated the 344th St. and 336th St. sites and found the potential impacts to tax revenue to be even greater than estimated impacts based on current development. Industrial vacancy rate in the City is approximately 0.5% and the lost employment opportunities represent a 50% to 100% increase in direct employment effects.

Land Use Impacts

The following comments relate to Section 3.4:

Page 3.4-20

An essential public facility (EPF) is allowed in all zones consistent with State Law and pursuant to FWRC 19.105.020. The design has not progressed to a point for specific mitigation to be discussed, but at a minimum land use compatibility measures consistent with Federal Way Revised Code is required. The project is also expected to comply with community design guidelines under FWRC 19.115.

The following comments are from City staff review of Appendix F, Technical Report on Land Use:

Page F2-10

- Table F2-4 is incomplete without acknowledging that the OMF-South is considered an EPF and will be reviewed under FWRC 19.105.020.

Page F2-13

- The information presented in Appendix C is not sufficient to justify the finding that the response to LUP14 is accurate or feasible.
- With regards to the comment on LUP23, how is a finding that alternative facilities could be developed consistent with the lack of provision of alternative facilities in the conceptual designs presented in Appendix C? One of the alternatives stretches from I-5 to 16th Ave. which eliminates the possibility for an alternative facility.

Page F2-14

- Comprehensive Plan policies need to be considered in totality. The proposal does not seem consistent with LUP35 or LUP38.
- With regards to the finding on LUP47, the Neighborhood Business (BN) zone is not proximal to the light rail system.
- With regards to the finding of LUP59, this sentence doesn't make sense as this policy states that the City development code will have a process for reviewing EPFs as per State law. The policy is not for de facto EPF approval nor is approval of an EPF implementation of this policy.

Additional Information – Land Use

Describe the proposal in enough detail to affirm that adequate room exists for appropriate compatibility between land uses. Deference to complying with code is identified, but a specific landscape buffer and planting schematic is not. The EIS needs to verify that adequate room exists on the site for this buffering after considering construction of lead tracks, security needs, and guideway clear zone requirements. The conceptual plans are not detailed enough for us to concur that mitigation is feasible.

Mitigation – Land Use

EPFs are required to provide mitigation based on the level of impact which will be reviewed as the project develops and information is refined. However, it is noted that FWRC 19.125 requires a 25-foot Type 1 landscaping buffer between industrial uses and residential zoning districts. That provides a baseline as to the level of screening that will be expected for at least a portion of the 336th St. and 344th St. alternatives. The impact of the guideway clear zone on the ability to meet the planting performance standards must be considered.

Environmental and Water Resources

The DEIS notes that Sound Transit will develop plans to mitigate “the effects of the project on wetlands, streams, and regulatory buffers on a watershed basis.” The work is noted as being

planned to be done in accordance with Federal, State, and local requirements as well as through consultation with tribal biologists. Similarly, water resources are noted as providing of mitigation through compliance with applicable stormwater permitting requirements. Such a broad statement for purposes of mitigation is hard to refute and we encourage Sound Transit to thoroughly evaluate the feasibility of the path forward for the Federal Way sites.

The following comments apply to Section 3.10:

- Has the potential need for large, woody debris as part of the stream restoration been evaluated? This could add to any potential flooding complications.
- Loss of fish habitat and associated identifiable mitigation is not included.

Page 3.10-6

- This section notes that the West Fork Hylebos Creek Tributary is subject to flooding issues while also noting the plan is to regrade the area constricting the wetland and possibly the stream bed. There doesn't appear to have been adequate hydraulics analysis to assess the feasibility of this work as presented in Appendix C.
- It is not clear how City Code will be met as part of regrading and realigning a stream channel.

Page 3.10-11

- The S 344th St. site indicates there is a 60-foot culvert in the current designs to accommodate an emergency access road. Under FWRC 19.145 it will be very challenging to meet the requirements to build a new culvert for a stream. Alternative site designs must be provided to show there is no other option and convenience is not a justification. The design needs to be updated to remove the culvert.

The following comments applies to Appendix G3 and is from pages G3-8 and G3-9:

- The Executive Proposed Basin Plan Hylebos Creek and Lower Puget Sound (King County 1991) should be a data source considered.

The following comment applies to Section 3.11 and is from page 3.11-14:

- Shouldn't the relocation of the existing WSDOT stormwater facility be part of the environmental analysis? No location is identified and it is a result of the proposed project.

Noise and Visual Impacts

The assessment of visual impacts by the Federal Way site alternatives, which both impact 336th at I-5, did not adequately address the presence of the historic Weyerhaeuser Campus immediately east. 336th St. and 344th St. site visual impacts need to be considered from former Weyerhaeuser property along 336th; this would likely change its level of visual impact from medium to medium-high or high;

The following comments pertain to Appendix G2:

- What is the source for the projected project noise level? How will this be verified against project completion?

Page G2-11

- What about bells from the light rail vehicles or other signals at crossings or upon exiting onto the tracks? This is not directly addressed.

Cumulative Impacts

The Commercial Enterprise (CE) zone is the only light industrial zone in the City of Federal Way and land will be converted for both the OMF-South (should a Federal Way location be selected) and the Tacoma Dome Link Extension. The cumulative impacts section discusses the impacts of light rail in the context of typical mixed-use, transit-oriented development which is not consistent with the current City industrial zoning. TDLE will be building stations in industrially zoned and/or developed lands in Fife and Tacoma (east station). Industrial land is at a premium in the region and if it is challenging for businesses displaced by transit facilities to relocate, it may push them further out to find suitable locations (as previously noted, the vacancy rate is as low as 0.5%). This related action could lead to sprawl or greenfield development and the DEIS should contemplate cumulative impacts of this land conversion comprehensively. The DEIS needs to consider the cumulative impacts of all known Sound Transit projects on industrial land supply based on current zoning.

Section 2.4.1 notes the OMF South and OMF North will have greater capacities than OMF East and OMF Central. What is the impact of other link extensions? This implies OMF North and South will produce greater externalities. Total capacity of the 4 OMFs is 496 LRVs. As OMF South is being built before OMF North, any reduction in footprint as a result of planned capacity exceeding project capacity will fall on OMF South. Section 4.5 should include a table of the link extensions coming online, such as Lynnwood and East, along with OMF capacities to better highlight the need and impacts of regional light rail extensions within Sound Transit 3.



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Jim Ferrell, Mayor

Please reach out to either of us or Ryan Medlen if you have any questions regarding the comments in this letter.

Sincerely,

EJ Walsh, P.E.
Public Works Director

Brian Davis
Community Development Director

cc: Jim Ferrell, Mayor
Ryan Medlen, Sound Transit Liaison

Attachment: Supplemental Appendix G1 comments
Sound Transit OMF Site Opportunity Cost Impact Assessment



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Jim Ferrell, Mayor

Attachment

Supplemental Appendix G1 comments

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Appendix-G1-transportation-tech-report.pdf Markup Summary

10 (1)

divay Landfill Alternative, South 336th Street
spectively (Figures G1-1-2 through G1-1-4).

Page Index: 10

Add description of existing land uses at each site

Add description of existing
land uses at each site

21 (1)



Page Index: 21

Label 21st Ave S on all figures

22 (1)

Minor Collector	2
Principal Arterial	6
Local Street	2
Minor Collector	2
Local Street	2
Interstate/Freeway	11

5 Lanes

Page Index: 22

5 Lanes

41 (1)

was, there are several designated freight
ite

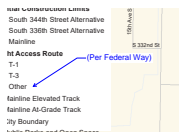
l route
ace: T3 route
ace: T6 route

gnalized truck/freight route by the cities c
als also designated 16th Avenue S as a

Page Index: 41

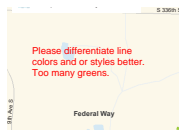
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43 (2)



Page Index: 43

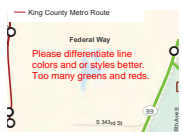
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Page Index: 43

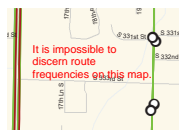
Please differentiate line colors and or styles better.
Too many greens.

46 (2)



Page Index: 46

Please differentiate line colors and or styles better.
Too many greens and reds.



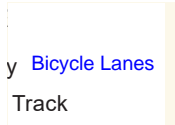
Page Index: 46

It is impossible to discern route frequencies on this
map.

49 (2)

- Mainline
- Bicycle Facility Type**
- Shared Roadway
- Mainline Elevated Track
- Mainline At-Grade Track

Page Index: 49



Page Index: 49

Bicycle Lanes

54 (3)

Table 9-1.3-10: Existing Conditions of Intersections from 2008 Street and South 336th Street and South 344th Street Area Intersections. The table lists various intersection types and their characteristics.

Page Index: 54

Is this the correct intersection? Should this be 16th Ave S?



Page Index: 54

Collision rates should be provided per City of Federal Way TIA guidelines to identify potential inadequacies, defined as:

- A collision rate of more than 1 collision per million entering vehicles at an intersections
- A collision rate of more than 10 collisions per million vehicle miles on a roadway segment

Page Index: 54

It's both - the west leg is S 340th PI

It's both - the west leg is S 340th PI

South 336th Street and South 344th Street Area Intersections

58 (1)

Table showing intersection data with red annotations. The text 'It's both - the west leg is S 340th PI' is written in red.

Page Index: 58

Collision rates should be provided per City of Federal Way TIA guidelines to identify potential inadequacies, defined as:

- A collision rate of more than 1 collision per million entering vehicles at an intersections

59 (1)

...and also two involving buses, which are also on the intersections. The three collisions were rear-end, and only one of the bus collisions resulted in minor injuries.

...with 336th Street and South 344th Street Alternative HOV Lane, representing 30 percent of all roadways in the area.

Index 01: Transportation Technical Report

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HOV, not BAT

63 (1)

...at #2 (SR 595 336th Street) would experience a decrease in delay during the 2042 PM peak hour and would no longer be the intersection with the highest delay.

...over the intersections that are proposed to operate below the existing conditions.

Please provide context for why PM peak hour delay at Intersection #2 decreases from existing to 2042 no-build conditions (changes in PHFs, signal timings, etc?)

Page Index: 63

Please provide context for why PM peak hour delay at Intersection #2 decreases from existing to 2042 no-build conditions (changes in PHFs, signal timings, etc?)

65 (1)

Table showing SB volumes with a red annotation 'SB volumes incorrect' pointing to a specific cell.

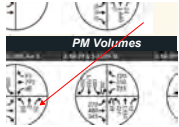
Page Index: 65

SB volumes incorrect



Page Index: 89

This figure should include trip distribution percentages on the map, or separate trip distribution figures should be provided.

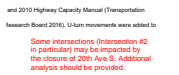


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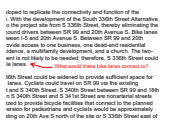
Page Index: 90

20th Ave S of 336th Street will be closed as part of this project. Existing trips entering and exiting need to be removed and rerouted in order to adequately analyze the impacts of the roadway closure.



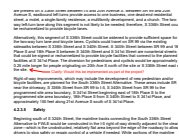
Page Index: 93

Some intersections (Intersection #2 in particular) may be impacted by the closure of 20th Ave S. Additional analysis should be provided.



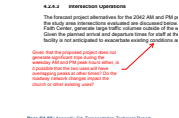
Page Index: 95

What would these bike lanes connect to?



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Clarify: Would this be implemented as part of the project?



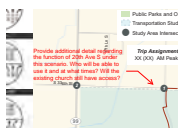
Page Index: 96

Given that the proposed project does not generate significant trips during the weekday AM and PM peak hours either, is it possible that the two uses will have overlapping peaks at other times? Do the roadway network changes impact the church or other existing uses?



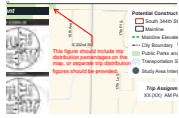
Page Index: 96

For trips removed from intersection #6: volumes should either be: (1) rerouted to other intersections in the network, or (2) if to be removed completely, trips should be removed at other intersections as well and justification should be provided as to why those trips will be removed from the network.



Page Index: 97

Provide additional detail regarding the function of 20th Ave S under this scenario. Who will be able to use it and at what times? Will the existing church still have access?



Page Index: 97

This figure should include trip distribution percentages on the map, or separate trip distribution figures should be provided.

98 (4)



Page Index: 98

For trips removed from intersection #6: volumes should either be: (1) rerouted to other intersections in the network, or (2) if to be removed completely, trips should be removed at other intersections as well and justification should be provided as to why those trips will be removed from the network.

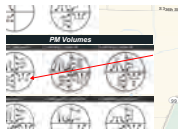
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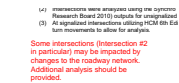
Page Index: 98

20th Ave S of 336th Street will be limited in access as part of the project. Existing trips entering and exiting need to be removed and rerouted in order to adequately analyze the impacts of the roadway closure.

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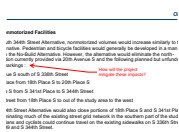
99 (1)



Page Index: 99

Some intersections (Intersection #2 in particular) may be impacted by changes to the roadway network. Additional analysis should be provided.

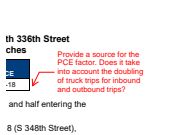
103 (1)



Page Index: 103

How will the project mitigate these impacts?

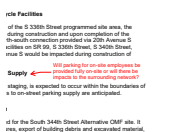
114 (1)



Page Index: 114

Provide a source for the PCE factor. Does it take into account the doubling of truck trips for inbound and outbound trips?

118 (1)



Page Index: 118

Will parking for on-site employees be provided fully on-site or will there be impacts to the surrounding network?

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Jim Ferrell, Mayor

Attachment

Sound Transit OMF Site Opportunity Cost Impact Assessment

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To: E.J. Walsh and Ryan Medlen
City of Federal Way

Date: April 19, 2021

From: Gordon Wilson
Todd Chase
Tim Wood
FCS GROUP



RE Sound Transit OMF Site Opportunity Cost Impact Assessment DRAFT

INTRODUCTION

As Sound Transit expands its light rail network throughout the region, it has identified the need for a new regional Operations and Maintenance Facility (OMF) to store and maintain its growing fleet of vehicles. The agency has determined that an OMF should be located to the south of Sea-Tac International Airport. Sound Transit has pared down an initial list of candidate sites to three, including one on a landfill site in Kent and two potential sites in Federal Way.

The City of Federal Way contracted with FCS GROUP to analyze the potential economic impacts of the two Federal Way sites. A previous Memorandum by FCS dated April 13 describes the potential short-term economic impact of the OMF based on the most current assumptions that have been made available by Sound Transit as of April 1, 2021.

Because much of the property being considered by Sound Transit is classified as vacant or underutilized land, this Memorandum evaluates the opportunity cost to local and state governments if this land is utilized by the OMF. When vacant and underutilized land is not developed by private (or not-for-profit) entities at its highest and best use it will not produce governmental tax revenues, jobs or housing. This in-turn represents a potential opportunity cost associated with foregone future tax revenues, jobs and housing within local and state government agencies.

SITE DESCRIPTIONS

For the purposes of this analysis, FCS evaluated the two Federal Way sites. The two sites are adjacent to one another located between Pacific Highway and Interstate 5 in the Kitts Corner area of the City (see the site map in **Exhibits 1 & 2**). There is a 27.37-acre area which is a part of both sites consisting of warehouses, residential and industrial properties and housing.

The two sites are as follows:

- **344th Street Site:** is a 59.64-acre site south of the CFC site. Existing uses are primarily industrial and commercial, with some single family residential, spread across 52 separate parcels with a southern boundary along South 344th Street. The site includes the 27.37-acre area that is shared (included) with the CFC site mentioned below. The vacant and redevelopable land within this site (31.43 net acres) is identified by zone classification in **Exhibit 3**.
- **Christian Faith Center (CFC) Site:** is a 59.98-acre northernmost site which is primarily owned by the Christian Faith Center, including a large church, school and community facility. The CFC owns 80% of the site, the remainder includes the 27.37-acre shared area mentioned above. This

site will be referred to as the CFC site in this study. The vacant and redevelopable land within this site (21.06 net acres) is identified by zone classification in **Exhibit 3**.

Exhibit 1: Vacant and Redevelopable Site Map by Tax Lot (344th Site)

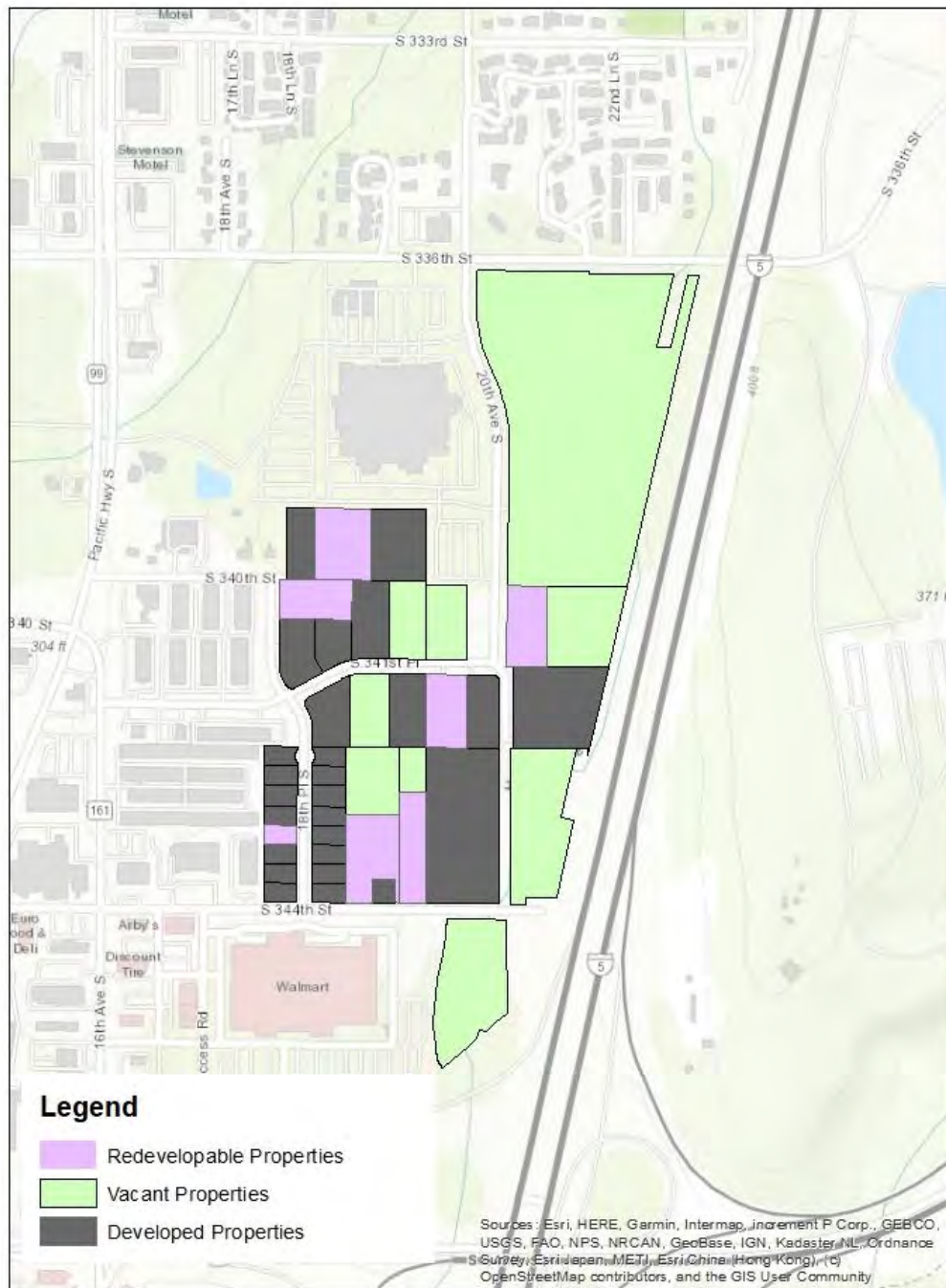
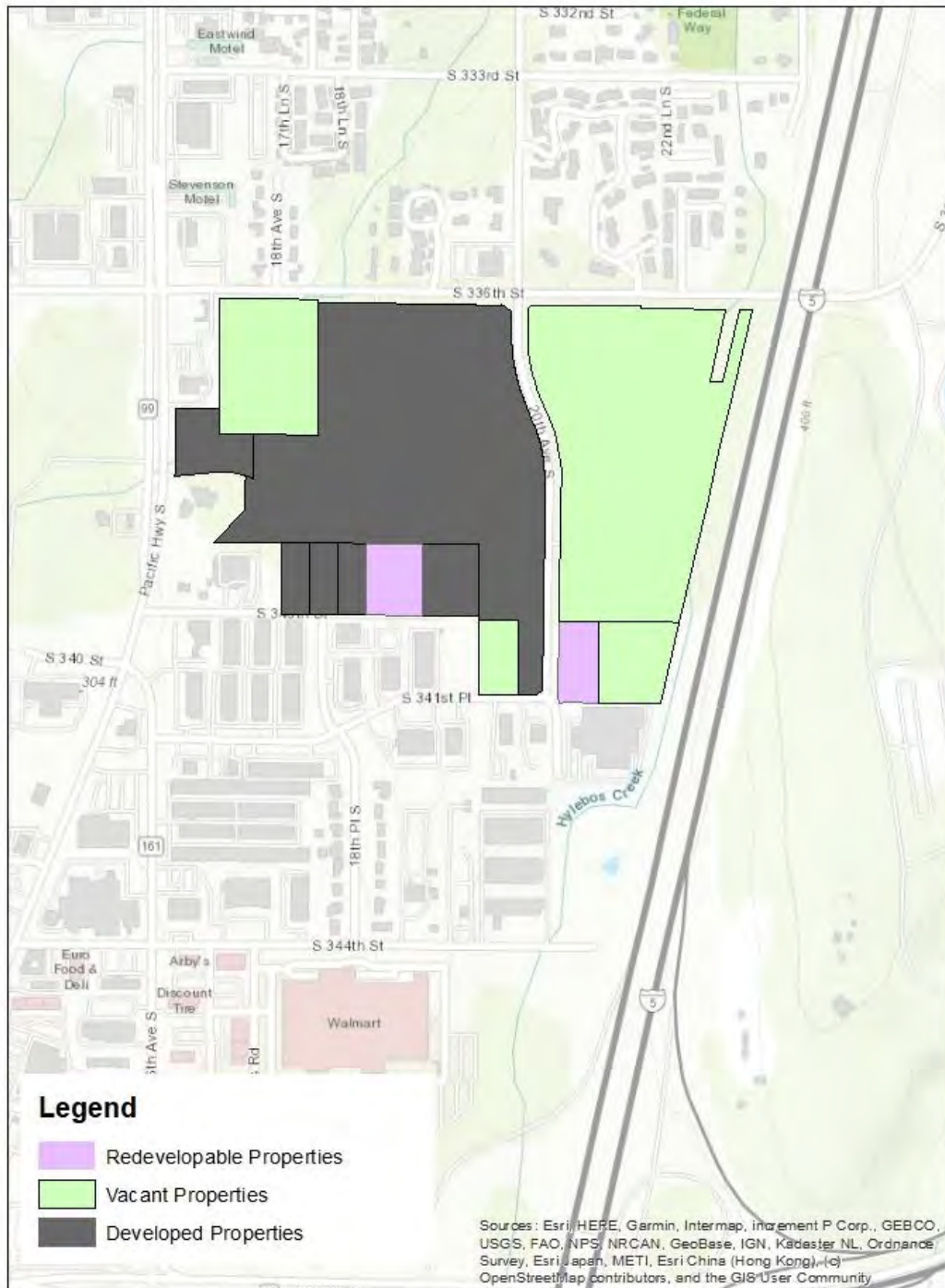


Exhibit 2: Vacant and Redevelopable Site Map by Tax Lot (CFC Site)



The tax lots shown in **Exhibits 1 and 2** were evaluated using current King County Assessor data and local planning data to determine their current zoning, gross land area and current value of land and improvements. Land that is potentially constrained by “critical areas” such as wetlands and drainage areas has also been considered in the calculation of net vacant land area.

Land within the OMF sites have been classified by current land use zoning designation and grouped into three categories:

- **Developed:** defined to include tax lots with an improvement value greater than land value based on King County Assessor data;
- **Vacant:** includes tax lots that are classified by the King County Assessor as vacant;
- **Redevelopable:** includes underutilized tax lots where the land value is equal or greater than the improvement value per the King County Assessor records.

This analysis focuses exclusively on the vacant and redevelopable tax lots. The calculation of gross and net land area and building area (SF) for the OMF Sites is summarized in **Exhibit 3**.

As indicated below, this buildable land analysis has identified a total of 31.43 acres of vacant and redevelopable land within the 344th Site, including 24.23 vacant acres and 7.20 redevelopable areas. The majority of this vacant and redevelopable land (15.75 acres) is planned for higher density multifamily housing with an underlying zone classification of RM3600. The 344th Site also includes 15.68 acres of vacant and redevelopable Commercial Enterprise (CE) and Business Commercial (BC) land area.

The CFC Site includes 21.06 acres of vacant and redevelopable land area, including 18.49 acres of vacant land and 2.57 acres of redevelopable land. All of the vacant and redevelopable multifamily land is shared between the two sites. Please refer to **Appendix A** for a more detailed summary of the vacant and redevelopable land base and the underlying land use zoning allowances.

Exhibit 3: Summary of Vacant and Redevelopable Land Area

Vacant & Redev. Land Area (acres)*	344th Parcels	CFC Parcels	Shared Parcels
RM 3600 Zones			
Vacant	14.32	14.32	14.32
Redevelopable	1.43	1.43	1.43
CE/BC Zones			
Vacant	9.91	4.17	3.08
Redevelopable	5.77	1.14	1.14
Total			
Vacant	24.23	18.49	17.40
Redevelopable	7.20	2.57	2.57
Total	31.43	21.06	19.97

* Excludes land classified as critical lands and developed lands.

Redevelopment land is defined as having land value equal or greater than existing improvement value.

KEY ASSUMPTIONS

To assess the potential impact of utilizing vacant land for the OMF in lieu of private development, FCS evaluated opportunity costs in terms of housing, population, employment, and foregone tax revenues. Key metrics include:

- **Property Tax Revenue:** Taxable property values for each OMF siting scenario were based on current records provided by the King County Assessor’s office. It is assumed that the OMF would be tax-exempt public property. The opportunity cost analysis assumes that vacant and underutilized land is developed as taxable private property by year 10 (2031). Current property

tax millage rates were applied to the taxable value in each area to calculate the potential loss of property tax revenue. It should be noted that for analysis purposes, current property ownership status (private vs. non-profit) is not considered to be a constraint regarding a site's future development potential or taxable status. Hence, this analysis assumes that a non-profit, such as the CFC, will eventually opt to sell some of its land to a private developer, who then develops the property for its zoned use.

- **Local Retail Sales Tax:** Retail sales reports from ESRI Business Analyst Online and Dunn & Bradstreet were used to identify taxable sales within the potential OMF sites. Annualized retail sales figures were multiplied by the City's current local sales tax rate (1%) to determine sales tax revenue once vacant and redevelopable land is developed by year 10 (2031).
- **State Shared Revenues:** This group of revenues is distributed by the State to cities based on population. In this analysis, the revenue estimates are the per-capita distribution multiplied by the number of people residing in each site. The Washington Municipal Research and Service Center (MRSC) provides per-capita distribution estimates for each type of State shared revenue. The opportunity cost analysis assumes that vacant and redevelopable multifamily zoned tax lots are fully developed by year 10 (2031) based on their underlying zoning and development standards. Following are the types of State shared revenues and the MRSC estimated distribution per capita:
 - Liquor Excise Tax: \$5.66 per resident.
 - Liquor Control Board Profits: \$7.90 per resident.
 - Motor Vehicle Fuel Tax (base): \$20.07 per resident.
 - Motor Vehicle Fuel Tax (increase): \$1.17 per resident.
 - Multi-Modal Transportation Tax: \$1.34 per resident.
 - Criminal Justice Distribution: \$1.17 per resident.
- **Housing and Population:** The opportunity cost analysis assumes that the vacant and underutilized multifamily zoned tax lots are fully developed by year 10 (2031) at allowed densities under current RM3600 zoning. For analysis purposes, it is assumed that this land is developed by a for-profit developer and allowances have been made for potential housing displacement. The analysis conservatively assumes that the vacant land which is partially impacted by critical lands does not transfer development density to unconstrained portions of their sites. Please refer to **Appendix B** for a summary of key development assumptions. Since there are few comparable multifamily developments in the OMF analysis area, FCS conducted a residual land value analysis to determine the scale and value of a large apartment development on a portion of the vacant land zoned for housing (see **Appendix C**).
- **Employment:** The opportunity cost analysis assumes that the vacant and underutilized CE/BC zoned tax lots are fully developed by year 10 (2031). It is assumed that this land is developed by a for-profit developer, and allowances have been made for potential business/job displacement as older buildings are replaced with new ones. Please refer to **Appendix B** for a summary of key assumptions.

ECONOMIC OVERVIEW

The Puget Sound Region is currently one of the fastest growing metropolitan areas in the United States. Significant population and employment growth has been occurring for decades and shows no sign of moderation.

Population

The City of Federal Way recorded a record-high population of 98,340 in 2020 (April 1 estimate by the Washington State Office of Financial Management (OFM) (**Exhibit 4**).

Long-range population forecasts prepared by OFM are not available on the city level but do anticipate King County will continue its rapid growth with nearly half a million new residents added to the County between now and 2040 (see **Exhibit 5**). If Federal Way's 4.4% share of King County's population growth holds constant, the City would be on tap for accommodating over 20,000 additional people by year 2040.

Exhibit 4: Population Trends (2010-2020)

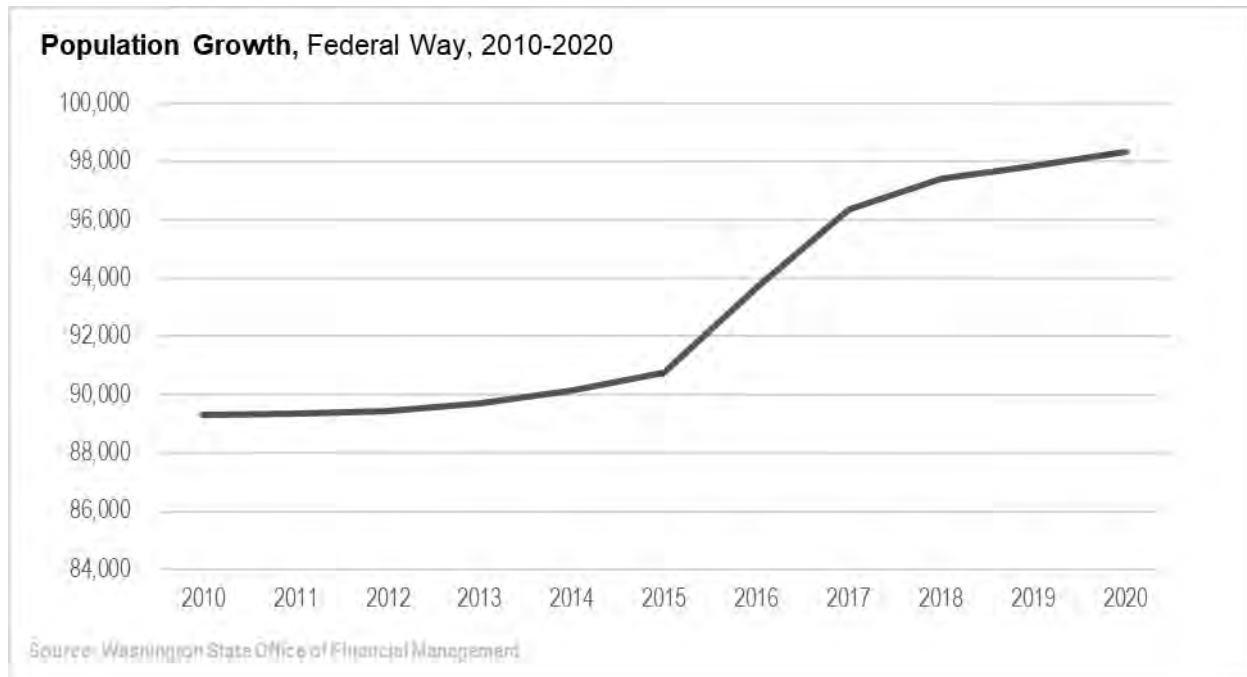
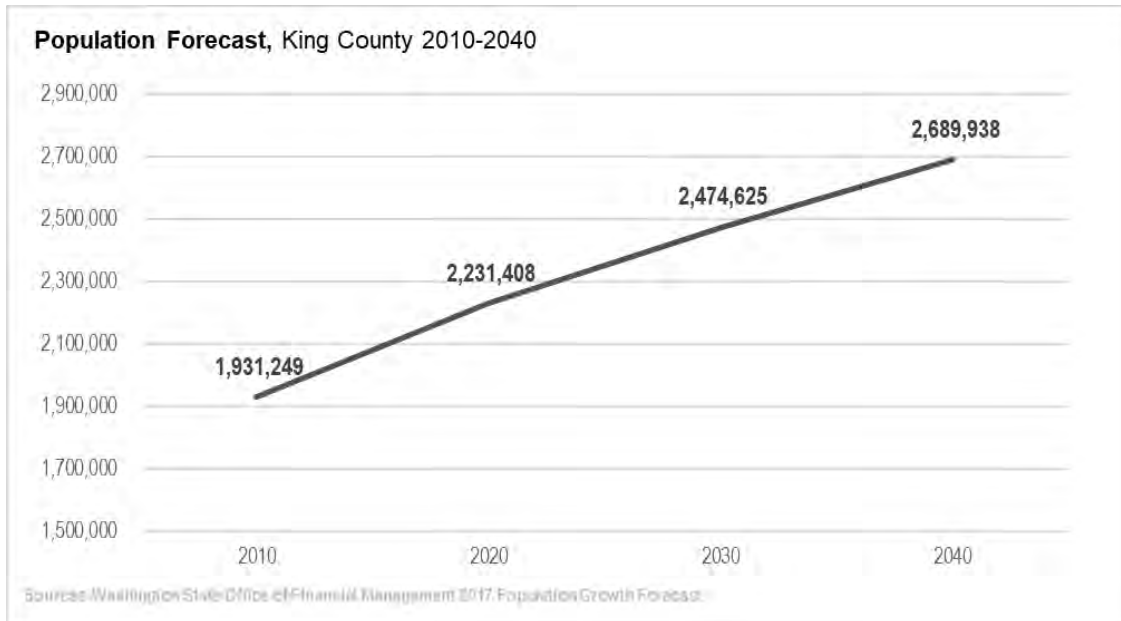


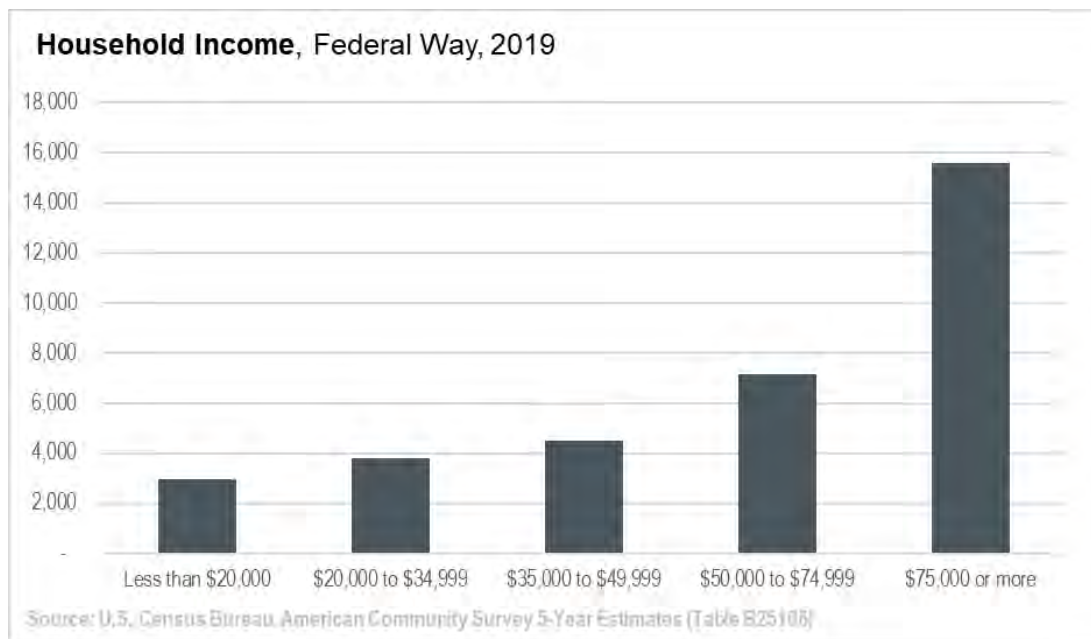
Exhibit 5: King County Population Projection (2010-2040)



Socio-economic Characteristics

As with many cities in the Puget Sound Region, income levels are relatively high in Federal Way compared with the rest of the state of Washington. As indicated in **Exhibit 6**, nearly half of the City's residents had household incomes above \$75,000.

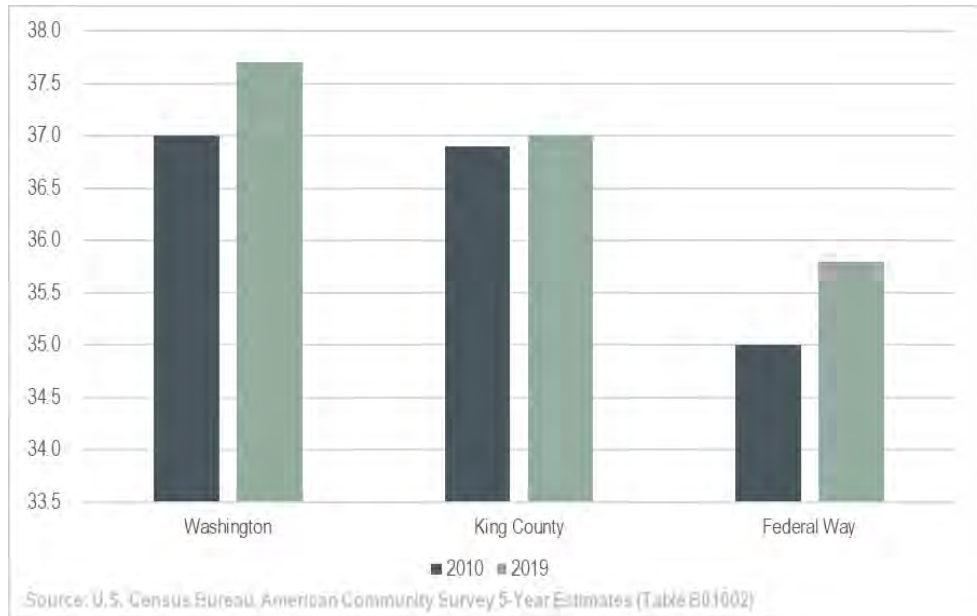
Exhibit 6: Households by Income Level, 2015-2019



In comparison with the state and county averages, Federal Way has a higher share of younger residents. The median age in Federal Way (35.8) is below the King county and statewide average

(Exhibit 7). Younger families tend to require new housing arrangements as they age, start families and have children.

Exhibit 7: Median Age, Washington, King County, Federal Way, 2010, 2019

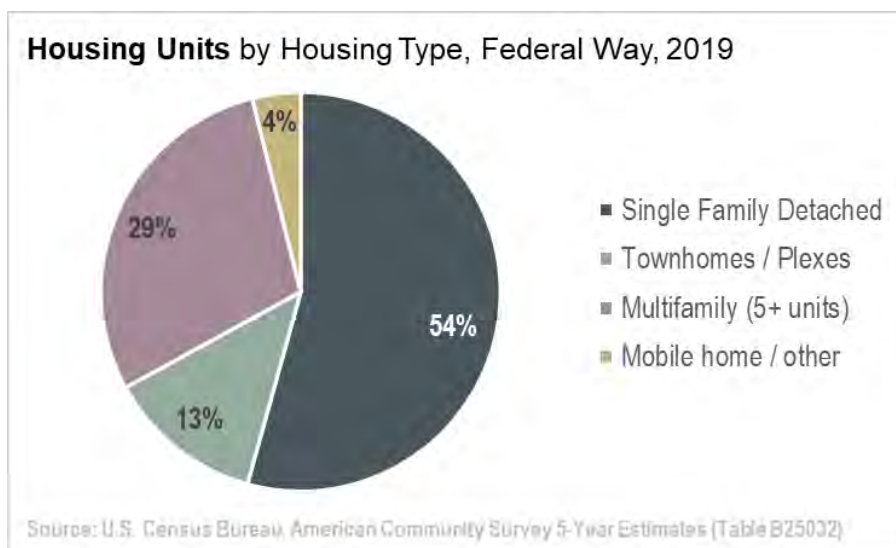


EXISTING HOUSING INVENTORY AND TENANCY

Local housing inventory and tenancy patterns shed light on housing conditions and demand preferences. In 2019, there were 34,755 housing units in the City of Federal Way.

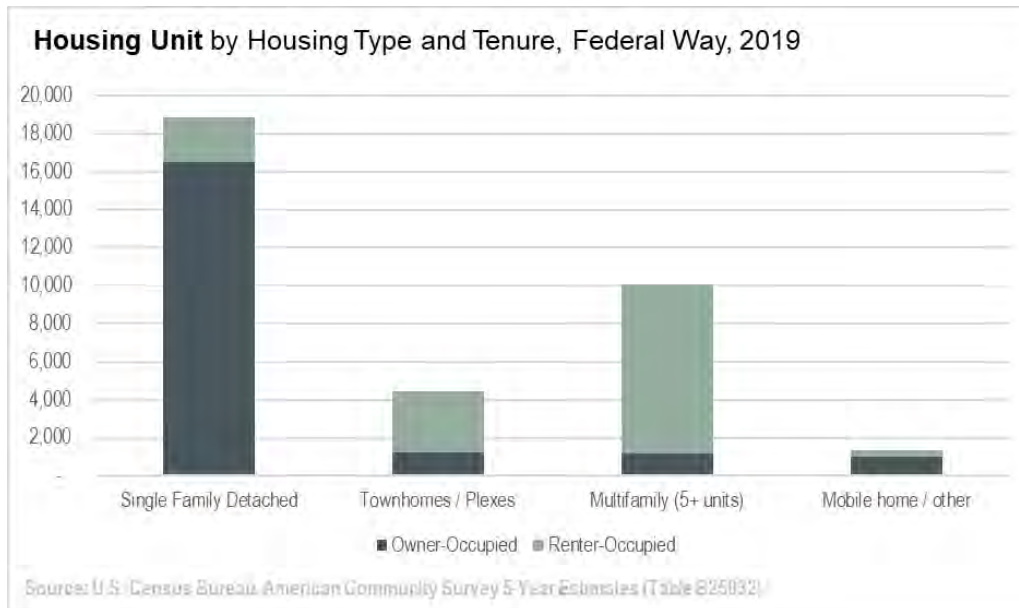
Like most communities, single-family detached housing is the most prevalent housing type with 54% of the housing stock. The remaining housing inventory in Federal Way includes multi-family (29%), townhomes and duplexes (13%), and mobile homes (4%), as shown in **Exhibit 8**.

Exhibit 8: Existing Housing Mix and Tenancy, 2015-2019, City of Federal Way



Owner-occupied housing accounts for 57% of the housing inventory while renter-occupied units account for 43% of the inventory. As would be expected, most homeowners reside in single-family detached units or manufactured homes. Most renters also reside in by single family attached and multifamily units, as indicated in **Exhibit 9**.

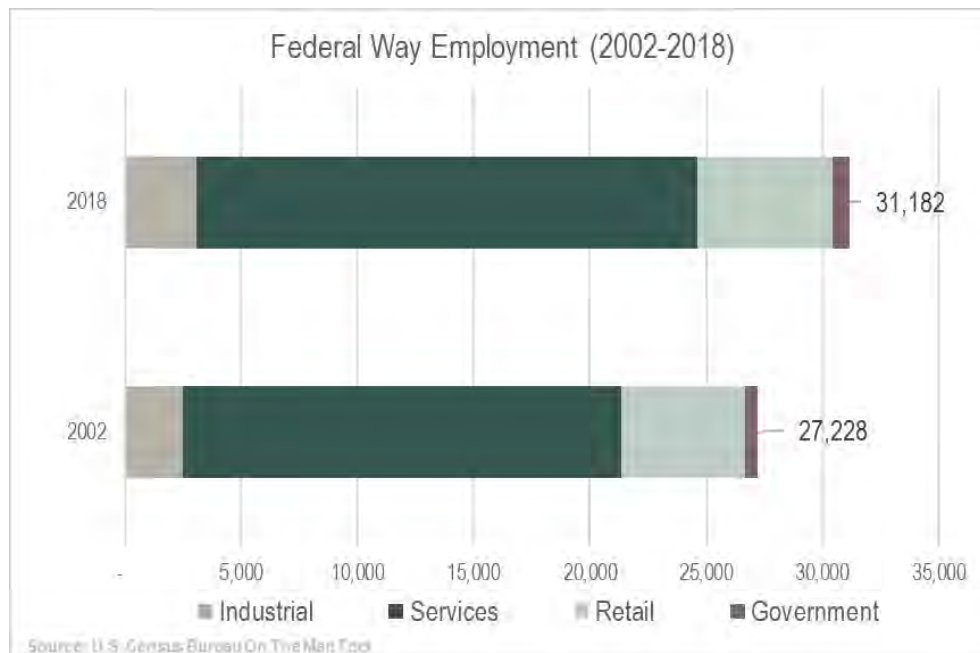
Exhibit 9: Existing Housing Tenancy, 2015-2019, City of Federal Way



EMPLOYMENT

Between 2002 and 2018, employment levels in Federal Way climbed by nearly 4,000 jobs, with most growth occurring in the industrial and services sectors (**Exhibit 10**).

Exhibit 10: Federal Way Employment (2002-2018)



REAL ESTATE MARKET OVERVIEW

The greater Puget Sound real estate market is beginning to bounce back from the Covid-19 pandemic. Key market indicators are described below based on published residential and commercial real estate broker reports for the 1st Quarter 2021.

Industrial Real Estate

- Industry professionals expect 2021 to be a record breaking year for the industrial real estate market in the Puget Sound.
- Vacancy is stable region-wide at 5% and year-over-year lease rates are beginning to increase.
- Absorption has begun to outpace project completions, indicating a tightening market overall.
- The Federal Way market is particularly tight with an overall industrial vacancy rate of 0.5%.
- Average total asking rent in Federal Way is 17% higher than the regional average.

Office Real Estate

- Industry professionals caution that until the vast majority of the workforce is immunized against Covid-19, it is unlikely that the office market will return to pre-pandemic conditions for years. Vacancy rates continue to increase in the region, rising to 7.7% in Q4 2020.
- Within the South King County submarket, office vacancy is at the highest levels observed in the region (14.1%).
- New development activity is still high and 72% of the new office developments in the region are pre-committed.
- Alaska Airlines HQ expansion project is presently under construction and will be a highlight of the regional office market.

Retail Real Estate

- Industry professionals highlight the “twin threats” to retail from both Covid-19 and increases in e-commerce.
- Vacancy rates began to decrease in Q4 of 2020, settling at a rate of 3.18%.
- While growth in retail lease rates was modest, there was a slight year-over-year increase.
- Industry experts expect a slight “snap back” with vacancy increasing about 0.8% in the first half of 2021 before stabilizing later in the year.

Multifamily Housing

- Multifamily real estate is taking longer to bounce back from the dip observed in 2020 with overall vacancy rates in the region up from 5.7% in Q1 of 2020 to 7.6% in Q1 of 2021.
- Institutional investments in multifamily developments is up significantly year-over-year.
- Year-over-year multifamily construction activity in the Region is up to 3,411 units in Q1 2021 compared with 3,006 units in Q1 2020.

- Average monthly rents in the Region during Q1 2021 range from \$1,297 (studio), \$1,503 (1 bedroom), \$1,797 (2 bedroom) and \$2,126 (3 bedroom).
- While the short-term market impacts of the Covid-19 pandemic is still being felt, the long-term economic growth trend for the Puget Sound Region, King County and Federal Way is very positive.

OPPORTUNITY COST METHODOLOGY

This opportunity cost analysis generally follows the methodology applied in the previous OMF economic impact analysis by FCS. The steps taken include:

Step 1. Identify and quantify vacant and underutilized tax lots and land area by land use zone (based on Assessor data).

Step 2. Estimate and deduct critical lands from gross land area (based on King County Critical Lands maps layer).

Step 3. Identify existing buildings, jobs and housing units on vacant and underutilized tax lots (based on Assessor data).

Step 4. Review applicable current zoning and development standards regarding allowable building density, height, parking requirements, setbacks, etc.

Step 5. Analyze County Assessor data to compare appraised value of land and building improvements of developed properties to vacant and underutilized properties. Apply findings to the vacant and redevelopable land inventory to estimate potential increases in assessed value and taxable construction materials for new development in the CE/BE zones.

Step 6. Analyze existing employment and sales data for existing enterprises within the CE/BC zones and apply vacancy and job density assumptions to the vacant and redevelopable land area to estimate potential net changes in employment and taxable sales.

Step 7. Conduct Residual Land Value analysis for the multifamily sites to determine the allowable use of those sites if fully developed. This analysis (provided in **Appendix C**) is considered common practice when analyzing housing and mixed-use development potential. The findings are used to estimate: land and improvement values; housing units; population; and related factors.

Step 8. Apply current tax rates to values derived from steps 1-7 to determine fiscal impacts on local and state governments if vacant and redevelopment sites are not utilized for their planned use. The analysis assumes development buildout occurs by year 10 (2031). A 30-year cash flow analysis has been conducted assuming that property tax rates increase by 1.0% annually and other taxes increase by 0.05% annually.

Foregone Population-based Shared Tax Revenue

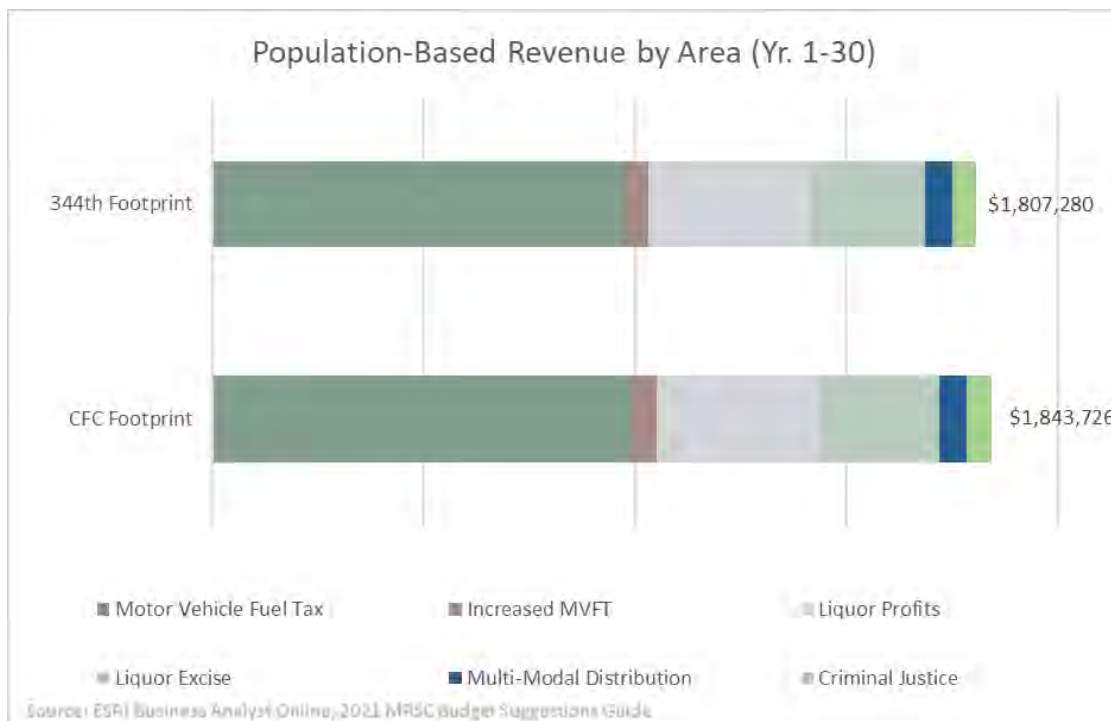
Exhibit 11 shows the potential amount of population added by new development on the vacant and redevelopable land area is expected to add 1,786 new residents in the 344th site and 1,826 residents in the CFC site.

Exhibit 11: Potential Foregone Population Increase (Years 1-30)



Population is used to determine the impact of foregone state shared revenues, which are distributed based on population. The cumulative forecast of foregone population-based shared tax revenue over the next 30 years is shown in Exhibit 12.

Exhibit 12: Cumulative Population-Based Foregone Revenues by Site (Years 1-30)



Foregone Property Tax Revenue

Development of the OMF would preclude the full buildout of the two sites, which means the City of Federal Way and other government entities would not realize property tax revenues from new development. Estimated taxable property value at buildout is shown in **Exhibit 13**. Potential foregone property tax revenue is slightly higher for the 344th footprint because there is more vacant and redevelopable land in that area.

Exhibit 13: Foregone Taxable Property Values



Taxable property value drives property tax revenues. Figures shown above are used in conjunction with property mil rates shown in **Exhibit 14** to determine overall property tax impacts for each site.

Exhibit 14: Property Tax Rates by District (2021)

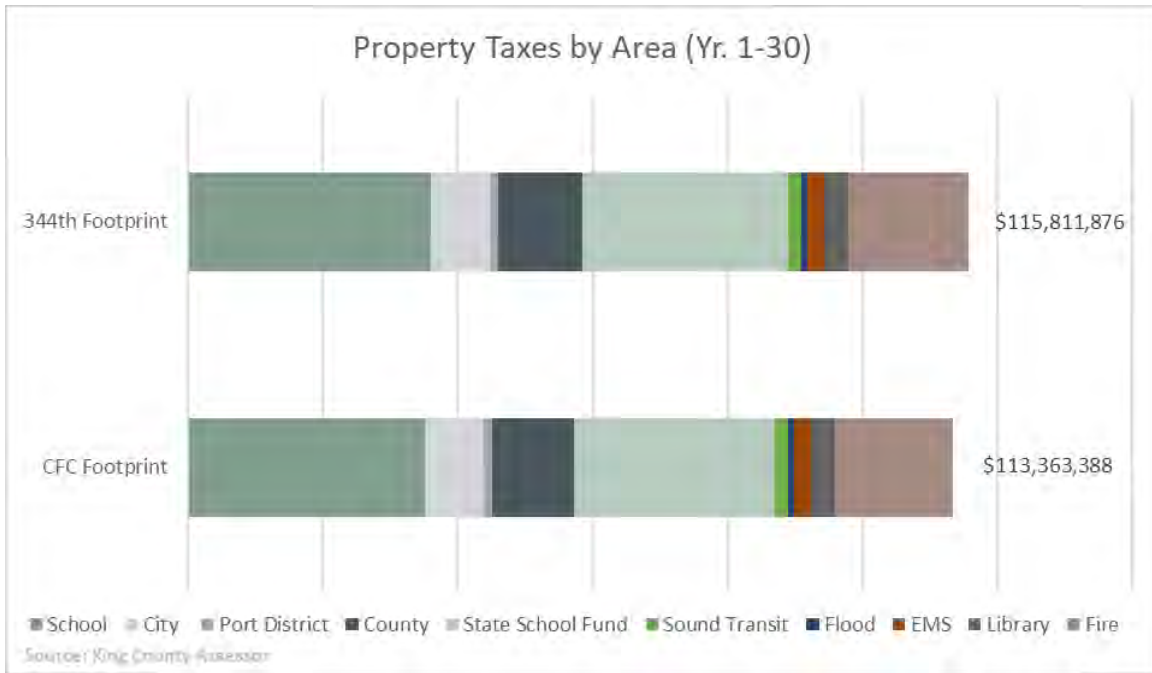
Mil Rates (Federal Way 2021)	
School	\$3.63
City	\$0.90
Port District	\$0.12
County	\$1.25
State School Fund	\$3.09
Sound Transit	\$0.20
Flood	\$0.09
EMS	\$0.26
Library	\$0.36
Fire	\$1.80

[Source: King County Mil Rates for Parcel #390380-0040](#)

Exhibit 15 shows the amount of foregone property tax revenue to all taxing jurisdictions, including the school district, the State School Fund, City, County, South King Fire and Rescue, and other local governments. The cumulative amount of foregone 30-year property tax revenue to all taxing districts with the 344th Site (\$115,811,876) is just slightly larger than the CFC Site (\$113,363,388). The

amount of cumulative 30-year property tax revenue for the City is also higher with the 344th Site (\$8.9 million) than with the CFC Site (\$8.7 million).

Exhibit 15: Foregone Property Tax Revenues by Area (Years 1-30)

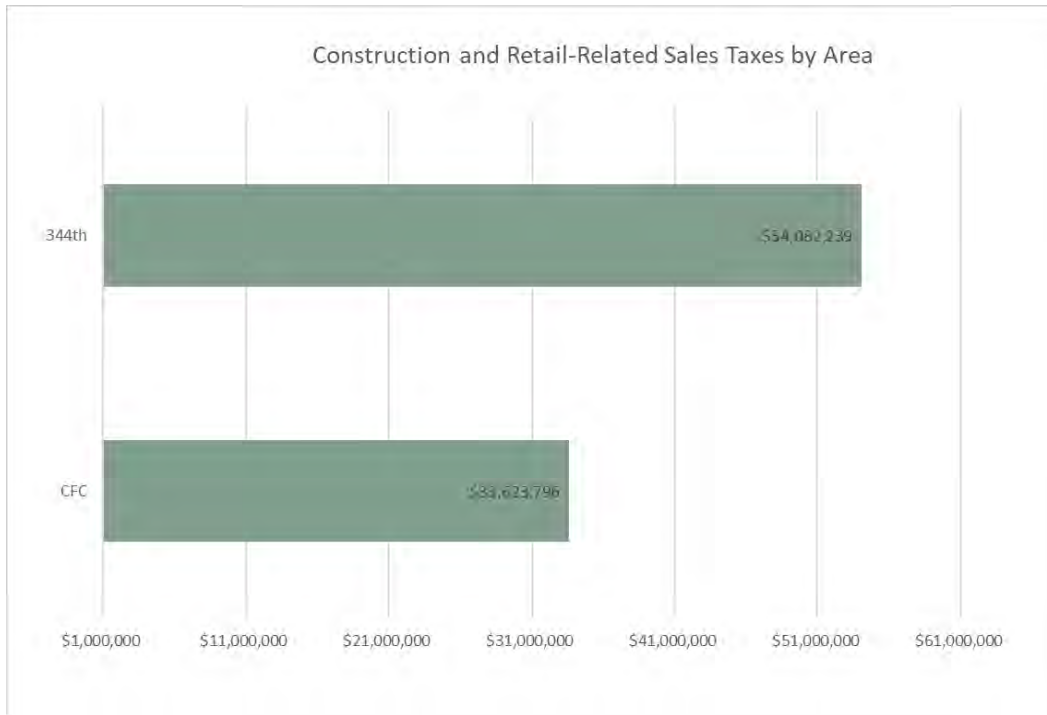


Foregone Sales Tax Revenue

When new development occurs, the City assesses a sales tax on construction materials that are delivered to a site. Based on the value of foregone private construction, the 344th Site is expected to result in \$535 million in foregone taxable sales; while the CFC site is expected to cause about \$333 million in foregone taxable construction value.

Applying current (2020) retail sales tax rates, the amount of foregone state and local sales tax revenues have been projected for both sites (**Exhibit 16**). The cumulative amount of foregone state, county and City sales taxes from OTF development are projected to range from \$54 million with the 344th Site to nearly \$34 million in the CFC Site.

Exhibit 16: Cumulative Foregone Sales Tax Revenues (Years 1-30)



Summary of Opportunity Costs

The long-term opportunity cost of foregone tax revenues for the City of Federal Way are summarized in **Exhibits 17 and 18**. The combination of foregone property tax revenue, sales tax revenue and state-shared tax revenue is forecasted to range from \$13.4 million with the CFC Site to \$15.3 million with the 344th Site.

Exhibit 17: Cumulative Foregone Revenues, City of Federal Way, Years 1-30



Exhibit 18: Cumulative Foregone Revenues, City of Federal Way, Years 1-30

	344th Footprint	CFC Footprint
State Shared Revenue		
Motor Vehicle Fuel Tax	\$974,000	\$991,787
Multi-Modal Distribution	\$64,768	\$66,218
Increased MVFT	\$56,551	\$57,817
Liquor Profits	\$381,840	\$390,389
Liquor Excise	\$273,571	\$279,697
Criminal Justice Distribution	\$56,551	\$57,817
Subtotal State Shared Revenue	\$1,807,280	\$1,843,726
Property Tax Revenue		
School	\$35,941,101	\$35,181,237
City	\$8,935,357	\$8,746,446
Port District	\$1,186,352	\$1,161,270
County	\$12,343,447	\$12,082,482
State School Fund	\$30,571,829	\$29,925,481
Sound Transit	\$1,951,086	\$1,909,836
Flood	\$881,943	\$863,297
EMS	\$2,623,260	\$2,567,799
Library	\$3,537,376	\$3,462,589
Fire	\$17,840,125	\$17,462,950
Subtotal Property Tax Revenue	\$115,811,876	\$113,363,388
Sales Tax Revenue		
Federal Way Sales Tax Revenue	\$4,551,476	\$2,829,725
State & County Sales Tax Revenue	\$49,530,763	\$30,794,070
Subtotal Sales Tax Revenue	\$54,082,239	\$33,623,796
Subtotal Federal Way Revenue	\$15,294,113	\$13,419,897
Subtotal Other Government Revenue	\$156,407,282	\$135,411,012
Total Revenue	\$171,701,395	\$148,830,910

Summary of Housing and Employment Impacts

The housing and population-related opportunity costs would be the same for both site options. As indicated in **Exhibit 19**, it is conservatively estimated that the vacant and redevelopable RM3600 zoned land can accommodate 1,216 new dwelling units and 1,844 people once developed. It is estimated that there would be a variation in the amount of housing and population displaced between the site options.

After accounting for potentially displaced population, the net opportunity cost of the OTF is forecasted to range from 1,158 housing units (1,786 people) with the 344th Site and 1,198 dwelling units (1,826 people) with the CFC Site (**Exhibit 19**).

Exhibit 19: Opportunity Cost of Foregone Housing and Population Growth

Net New Population If Vacant and Redevelopment Land is Developed Under Current Zoning

	344th Parcels	CFC Parcels	Shared Parcels
New Dwellings Added*	1,216	1,216	1,216
Less Vacancy Allowance	4%	4%	4%
Avg. People per Dwelling Unit*	1.58	1.58	1.58
People in New Development	1,844	1,844	1,844
Less Persons Displaced	(58)	(18)	-
Net New People Added	1,786	1,826	1,844
Net New Housing Units Added	1,158	1,198	1,216

* based on multifamily housing residual land value analysis in Appendix.

The opportunity cost of foregone job growth varies by Site. As shown in **Exhibit 20**, using the current mix of employment types, the amount of foregone private-sector job growth is expected to range from 90 jobs with the CFC Site to 188 jobs with the 344th Site.

Exhibit 20: Permanent Employment Impact Analysis

Employment Analysis without OMF	344th Site	CFC Site	Shared Parcels
Existing Employment (2021)	156	218	35
Potential Light Industrial Jobs Added	115	49	36
Potential Commercial Jobs Added	110	46	34
Less Jobs Displaced	(38)	(5)	(5)
Net New Jobs Added without OMF	188	90	66
Total Existing and Potential Jobs without OMF	344	308	101
Employment Analysis with OMF			
Existing Direct Employment (2021)	156	218	35
Potential OMF Jobs On Site	476	476	n/a
Less Existing and Potential Jobs Displaced	(344)	(308)	(101)
Total Existing and Potential Jobs with OMF	288	386	n/a
Difference in Jobs with and without OMF	55	(77)	

Excludes potential employment on multifamily-zoned land.

According to the Sound Transit Draft Environmental Impact Statement (DEIS), the OMF will generate about 476 relatively high wage direct jobs on site. After accounting for potentially displaced jobs, the OMF would likely result in a net increase in jobs with the 344th Site (55 jobs), and a decrease in jobs with the CFC Site (-77 jobs).

SUMMARY OF FINDINGS

This Memorandum evaluates the opportunity cost to local and state governments if vacant and underutilized land is developed for the OMF. When vacant and underutilized land is not developed by private (or not-for-profit) entities at its highest and best use it will not produce governmental tax revenues, jobs or housing. This in-turn represents a long-term opportunity cost associated with foregone future tax revenues, jobs and housing.

The buildable land analysis identified 31.43 acres of vacant and redevelopable land within the 344th Site, including 24.23 vacant acres and 7.20 acres of redevelopable land area. The majority of this

vacant and redevelopable land (15.75 acres) is planned for higher density multifamily housing with an underlying zone classification of RM3600. The 344th Site also includes 15.68 acres of vacant and redevelopable Commercial Enterprise (CE) and Business Commercial (BC) land area.

The CFC Site includes 21.06 acres of vacant/redevelopable land area, with 18.49 acres of vacant land and 2.57 acres of redevelopable land. All of the vacant multifamily land is shared between the two sites.

The opportunity cost analysis assumes that vacant and redevelopable multifamily-zoned tax lots are fully developed by year 10 (2031) based on their underlying zoning and development standards. For analysis purposes, it is assumed that this land is developed by a for-profit developer and allowances have been made for potential housing and employment displacement. The analysis also conservatively assumes that the vacant land impacted by critical lands is not able to transfer development density to unconstrained portions of their sites.

While the short-term economic impacts of the Covid-19 pandemic are still being felt, the long-term economic growth for the Puget Sound Region, King County and City of Federal Way is very positive. If Federal Way's 4.4% share of King County's population growth holds constant, the City would be on tap for accommodating over 20,000 additional people (7,500+ housing units) by year 2040.

After accounting for potentially displaced population, the net opportunity cost of the OTF is forecasted to range from 1,158 housing units (1,786 people) with the 344th Site and 1,198 dwelling units (1,826 people) with the CFC Site.

After accounting for potentially displaced jobs, the OMF would likely result in a net increase in jobs with the 344th Site (55 jobs), and a decrease in jobs with the CFC Site (-77 jobs).

With development of the OTF, the combination of foregone property tax revenue, foregone sales tax revenue and foregone state-shared tax revenue to the City of Federal Way over the next 30 years is forecasted to range from \$13.4 million with the CFC Site to \$15.3 million with the 344th Site.

In summary, the overall opportunity cost attributed to the OTF facility varies marginally depending upon the site that is chosen. While direct employment within the study area could be higher with the OTF, the level of foregone tax revenues and reduction in housing development potential in the area is significant.

Appendix A: Detailed Developable Land Analysis

344th

		<1.0 acre		1 to 5		5+		Total	
		Taxlots	Area	Taxlots	Area	Taxlots	Area	Taxlots	Area
RM3600	Vacant	-	-	-	-	1.00	19.09	1.00	19.09
	Redevelopable	-	-	1.00	1.50	-	-	1.00	1.50
	Existing Building SF	-	-	-	3,200	-	-	-	3,200
	Net Redevelopable	-	-	-	1.43	-	-	-	1.43
	Less Constraints	-	-	-	-	1.00	4.77	1.00	4.77
	Net Developable	-	-	1.00	1.43	1.00	14.32	2.00	15.74
CE	Vacant	1.00	0.45	7.00	12.57	-	-	8.00	13.02
	Redevelopable	1.00	0.24	5.00	6.13	-	-	6.00	6.37
	Existing Building SF	-	3,200	-	23,100	-	-	-	26,300
	Net Redevelopable	-	0.17	-	5.60	-	-	-	5.77
	Less Constraints	-	-	3.00	3.11	-	-	3.00	3.11
	Net Developable	2.00	0.62	12.00	15.06	-	-	14.00	15.68

CFC

		<1.0 acre		1 to 5		5+		Total	
		Taxlots	Area	Taxlots	Area	Taxlots	Area	Taxlots	Area
RM3600	Vacant	-	-	-	-	2.00	24.10	2.00	24.10
	Redevelopable	-	-	1.00	1.50	-	-	1.00	1.50
	Existing Building SF	-	-	-	3,200	-	-	-	3,200
	Net Redevelopable	-	-	-	1.43	-	-	-	1.43
	Less Constraints	-	-	-	-	2.00	9.78	2.00	9.78
	Net Developable	-	-	1.00	1.43	2.00	14.32	3.00	15.74
CE	Vacant	-	-	2.00	3.30	-	-	2.00	3.30
	Redevelopable	-	-	1.00	1.22	-	-	1.00	1.22
	Existing Building SF	-	-	-	3,200	-	-	-	3,200
	Net Redevelopable	-	-	-	1.14	-	-	-	1.14
	Less Constraints	-	-	1.00	0.22	-	-	1.00	0.22
	Net Developable	-	-	3.00	4.23	-	-	3.00	4.23
BC	Vacant	-	-	1.00	1.55	-	-	1.00	1.55
	Redevelopable	-	-	-	-	-	-	-	-
	Existing Building SF	-	-	-	-	-	-	-	-
	Net Redevelopable	-	-	-	-	-	-	-	-
	Less Constraints	-	-	1.00	0.46	-	-	1.00	0.46
	Net Developable	-	-	1.00	1.08	-	-	1.00	1.08

Shared

		<0.5		1 to 5		5+		Total	
		Taxlots	Area	Taxlots	Area	Taxlots	Area	Taxlots	Area
RM3600	Vacant	-	-	-	-	1.00	19.09	1.00	19.09
	Redevelopable	-	-	1.00	1.50	-	-	1.00	1.50
	Existing Building SF	-	-	-	3,200	-	-	-	3,200
	Net Redevelopable	-	-	-	1.43	-	-	-	1.43
	Less Constraints	-	-	-	-	1.00	4.77	1.00	4.77
	Net Developable	-	-	1.00	1.43	1.00	14.32	2.00	15.74
CE	Vacant	-	-	2.00	3.30	-	-	2.00	3.30
	Redevelopable	-	-	1.00	1.22	-	-	1.00	1.22
	Existing Building SF	-	-	-	3,200	-	-	-	3,200
	Net Redevelopable	-	-	-	1.14	-	-	-	1.14
	Less Constraints	-	-	1.00	0.22	-	-	1.00	0.22
	Net Developable	-	-	3.00	4.23	-	-	3.00	4.23

Source: King County Assessor and FCS.

Appendix B: Opportunity Cost Assumptions

Opportunity Cost Analysis Assumptions

Summary of Current Employment and Sales in OMF Analysis Area CE Zones

General Use	Employment	Mix	Sales per Job
Light Industrial	183	59%	\$ 156,361
Office/Commercial	125	41%	\$ 202,192
Total/Avg.	308	100%	\$ 174,961

Source: ESRI Business Locator; compiled by FCS GROUP.

Existing Assessed Value of Improvements per SF of Land Area, OMF Analysis Area

	CE/BC Zones
Developed	\$21.83
Redevelopable	\$13.78
Difference when Redevelopable Land is Developed	\$8.05

Vacant & Redev. Land Area (acres)*	344th Parcels	CFC Parcels	Shared Parcels
RM 3600 Zones			
Vacant	14.32	14.32	14.32
Redevelopable	1.43	1.43	1.43
CE/BC Zones			
Vacant	9.91	4.17	3.08
Redevelopable	5.77	1.14	1.14
Total			
Vacant	24.23	18.49	17.40
Redevelopable	7.20	2.57	2.57
Total	31.43	21.06	19.97

* Excludes land classified as critical lands and developed lands.

Redevelopment land is defined as having land value equal or greater than existing improvement value.

Existing Building Area	344th Parcels	CFC Parcels	Shared Parcels
RM3600 Zones	3,200	3,200	3,200
CE/BC Zones	26,300	3,200	3,200
Avg. SF per Job	619	619	619
Vacancy Allowance	10%	10%	10%
Current Employment	38	5	5

Excludes land classified as critical lands and developed lands.

Potential Net New Assessed Value of Vacant and Redevelopment Land Under Current Zoning

Net New Assessed Value	344th Parcels	CFC Parcels	Shared Parcels
RM3600 Zones (on vacant and redev. Land)*	\$323,517,549	\$323,517,549	\$323,517,549
CE/BC Zones			
on Vacant land	\$9,423,566	\$3,965,315	\$2,928,818
on Redevelopable land	\$2,023,297	\$399,750	\$399,750
Total Net New AV	\$334,964,411	\$327,882,614	\$326,846,116

Excludes land classified as critical lands and developed lands.

* based on multifamily housing residual land value analysis in Appendix.

Potential Net New Taxable Construction Materials

	344th Parcels	CFC Parcels	Shared Parcels
Total Construction Value (AV)	\$334,964,411	\$327,882,614	\$326,846,116
Materials Share of Total Value	45%	45%	45%
Taxable Value of Construction	\$150,733,985	\$147,547,176	\$147,080,752

Potential Net New Taxable Sales from Commercial Development (Annual)

	344th Parcels	CFC Parcels	Shared Parcels
Commercial Jobs Added	76	37	27
Sales Per Job	\$202,192	\$202,192	\$202,192
Taxable Value of Net New Annual Sales	\$15,389,349	\$7,414,468	\$5,376,570

Development & Employment Assumptions for CE/BC Zoned Land

	344th Parcels	CFC Parcels	Shared Parcels
Floor Area Ratio	0.35	0.35	0.35
Light Industrial Mix	59%	59%	59%
Commercial Mix	41%	41%	41%
Bldg. SF per Light Ind. Job	700	700	700
Bldg. SF per Com. Job	500	500	500
Vacancy Allowance	10%	10%	10%
Occupied Light Industrial SF	80,793	33,997	25,110
Occupied Commercial SF	55,186	23,222	17,152
Light Industrial Jobs Added	115	49	36
Commercial Jobs Added	110	46	34
Less Jobs Displaced	(38)	(5)	(5)
Net New Jobs Added	188	90	66

Excludes land classified as critical lands and developed lands.

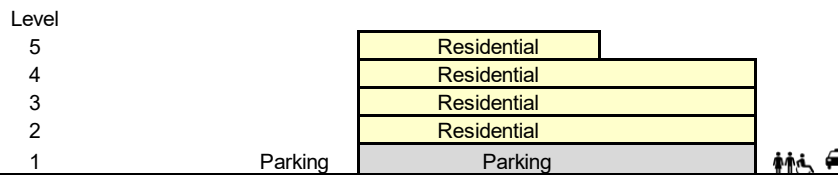
Net New Population If Vacant and Redevelopment Land is Developed Under Current Zoning

	344th Parcels	CFC Parcels	Shared Parcels
New Dwellings Added*	1,216	1,216	1,216
Less Vacancy Allowance	4%	4%	4%
Avg. People per Dwelling Unit*	1.58	1.58	1.58
People in New Development	1,844	1,844	1,844
Less Persons Displaced	(58)	(18)	-
Net New People Added	1,786	1,826	1,844
Net New Housing Units Added	1,158	1,198	1,216

* based on multifamily housing residual land value analysis in Appendix.

Appendix C: Residual Land Value Analysis

3.5-Levels, Wood Frame Apartments over Parking (100% market rate)



Particulars					
Site Area	15.74	acres	685,634	SF	net of critical lands
Dwellings Total			1,216		
Population increase			2,092		
Commercial SF			-		
Parking Ratio			1.58	per dwelling	
Surface Parking Stalls			842		
Structured Parking			1,117	in podium	
Total Stalls			1,959		
Dwellings per acre			77		
Construction Cost			\$359.5	million	
Cost per Dwelling Unit*			\$313,325	excludes land cost	
Assessed Value Creation			\$323.5	million	
Potential annual increase in City property tax rev.			\$292,010	for Gen. Fund	
<i>Target Annual Return on Developer Equity</i>			6%		
<i>Internal Rate of Return</i>			23%		
<i>Residual Land Value per SF of Land</i>			\$21.64		
<i>Residual Land Value per dwelling unit</i>			\$12,199		
<i>Overall Feasibility</i>			Excellent		

Apartment Development Pro forma Analysis					
Zone: RM3600					
3.5-Levels, Wood Frame Apartments over Parking (100% market rate)					
Unit Cost and Revenue Input Assumptions					
Particulars	Variable	Unit			Notes
Density & Land Use					
Site Size (gross area)	685,634	SF		15.74	Acres
Building Coverage	57%				per code
Building footprint	390,800	SF			
Parking Area (uncovered)	43%	294,823	SF	842	surface stalls
Building Levels (above grade)	3.5	levels			
Parking Levels (below building)	1.0	levels			
Parking Area (below building)	390,800	levels		1117	stalls below building
Residential Building area (above ground)	1,367,800			1959	total stalls
Residential floor area (net sqft)	1,094,240				
Residential floor area (gross sqft)	1,367,800		1,172,400		check sum
Average dwelling unit size (market rate units)	900	net SF			allowance
Average dwelling unit size (affordable units)	900	net SF			allowance
Market Rate Dwellings (studio units)	550	net SF			allowance
Market Rate Dwellings (1 bedroom)	936	net SF			allowance
Market Rate Dwellings (2 bedroom)	1,100	net SF			allowance
Net-to-Gross building area factor	1.20				Allowance
Residential dwellings	1,216	dwellings	Parking stalls per Unit		Use Goal Seek, D62 = D29 to get # of Units
Dwellings (studio units)	20%	dwellings	1.25		per code
Dwellings (1 bedroom)	55%	dwellings	1.5		per code
Dwellings (2 bedroom)	25%	dwellings	2.0		per code
	100%		1.58	avg	
Affordable dwelling units (share)	0%	dwellings			Assume 80% of AMI qualifies
Affordable dwellings	-				Assume 80% of AMI qualifies
Dwellings per Acre	77				
Above Ground FAR (excl. parking)	2.0				
Parking program					
Parking spaces per dwelling unit	1.58	per dwelling			
Parking spaces total (on site)	1,915	spaces			per code
Parking spaces: above ground, surface	842				
Parking spaces: above ground, in structure	1,117				
	1,959				
Parking area per space	350	SF			Allowance
Parking area total	670,400	SF			
Parking area: above ground	-				
Parking area: below ground	-				
Development Program Summary					
Residential floor area (gross)	1,367,800	SF			
Retail floor area	-	SF			
Other floor area	-	SF			
Parking area: above ground	390,800			0.6	
Total floor area: above ground	1,759,000				
Parking area: below ground	-				
FAR above grade, excluding parking	2.0				
FAR above grade, including parking	2.6				

Apartment Development Pro forma Analysis

Zone: RM3600

3.5-Levels, Wood Frame Apartments over Parking (100% market rate)

Unit Cost and Revenue Input Assumptions

Particulars	Variable	Unit		Notes
Construction costs				
Site Preparation/Access/Utilities	\$3.50	per SF of land	\$2,399,720	
Type I Construction	n/a			
Type V Construction	\$170	per GSF building	\$232,526,000	
Above Grade Parking	\$100	per GSF parking	\$39,080,000	
Surface Parking & Open Space	\$4,000	per stall	\$3,369,403	
Tenant Improvements & Bldg. Systems	\$30	per NSF building	\$32,827,200	
Subtotal			\$310,202,324	
Estimated Impact Fees & Charges	\$15,000	per dwelling	\$18,241,387	
Soft Costs (design, engineering, other fees, etc.)	10.0%	of subtotal	\$31,020,232	
Total Construction Cost			\$359,463,943	\$204 cost per total sf of building & parking area
				\$295,589 cost per dwelling unit (excludes land)
Ratio of Materials Cost to Construction Cost	0.45		\$161,758,774	value of materials delivered to site
Local Sales Excise tax				
Project Income Assumptions				
Lease-up period	12	months		
Market rate rent premium assumed	0%			
Market-rate units under 900 sqft	\$2.25	per SF/month		allowamce
Market-rate units over 900 sqft	\$2.10	per SF/month		allowamce
Commercial Rents per sqft		per SF/year		Loopnet.com
Parking Revenue per space	\$0	per stall/month		allowamce
Revenue escalation rate	2.8%	per year		
Cap Rate	5.0%			Apartmentvaluation.com
Project Operating Costs				
Assessed Value (AV) to Market Value Ratio	90%			
Property Tax Rate, Total Levies	\$11.70	per \$1000 AV		
Est. annual property tax. Total Levies	\$3,784,767	per year		
Property Tax Rate, Federal Way Levy	\$0.90	per \$1000 AV		
Est. annual property tax. City Levies	\$292,010			
Non-pass through Operating Cost (% of gross revenue)				
Vacancy & credit loss	4.0%			
Property taxes	13.0%			
Insurance	0.2%			
Maintenance	2.1%			
Reserves for replacement	2.0%			
Management & other expenses	10.0%			
Total Annual Operating & Vacancy Costs	31.3%			
Expense escalation rate	2.8%	per year		
Debt Service				
Loan-to-Value Ratio (excl. land)	60%			
Debt Coverage Ratio	1.25			
Interest Rate	4.0%			
Years of Construction	1.0			interest only payment during construction
Amortization (years)	20			
Loan origination fee	1.0%			
Transaction cost during sale or refinance in yr 12	5.0%			
Equity Assumptions				
Targeted Return on Equity & Overhead	6.0%			

¹ derived from RSMMeans, low-range cost for Seattle area; excludes land cost and financing, and extra-ordinary site work.

² assumes blended average of city rates and fees.

³ includes design, permitting, fees

⁴ assumes 1 year construction period with payment on interest only.

⁵ assumes market-based rents.

15-Apr-21

3.5-Levels, Wood Frame Apartments over Parking (100% market rate)

Apartment Prototype

1216 Apartments

PRELIMINARY DRAFT FOR LONG RANGE PLANNING ONLY

Residual Land Value Analysis

	2020	2020	2020	2020	2020	2020	2020	2020	2020	2020	2020	2020	2020	2020	2020	2020
	Year -1	Year 0	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14
DEVELOPMENT PROGRAM ASSUMPTIONS																
Market Rate Dwellings (studio units)	land & permitting	construction	243	243	243	243	243	243	243	243	243	243	243	243	243	243
Market Rate Dwellings (1 bedroom)			669	669	669	669	669	669	669	669	669	669	669	669	669	669
Market Rate Dwellings (2 bedroom)			304	304	304	304	304	304	304	304	304	304	304	304	304	304
Parking stalls (leasable)			1,117	1,117	1,117	1,117	1,117	1,117	1,117	1,117	1,117	1,117	1,117	1,117	1,117	1,117
Occupancy %		0%	50%	80%	96%	96%	96%	96%	96%	96%	96%	96%	96%	96%	96%	96%
INCOME																
Avg. Monthly Rental Income: Market Rate Units			\$2,025	\$2,081	\$2,140	\$2,199	\$2,261	\$2,324	\$2,389	\$2,456	\$2,525	\$2,596	\$2,668	\$2,743		
Gross Annual Rental Income			\$14,772,240	\$24,297,380	\$29,973,248	\$30,812,499	\$31,675,249	\$32,562,156	\$33,473,897	\$34,411,166	\$35,374,678	\$36,365,169	\$37,383,394	\$38,430,129		
Less Vacancy & Credit Loss Allowance			(\$590,890)	(\$971,895)	(\$1,198,930)	(\$1,232,500)	(\$1,267,010)	(\$1,302,496)	(\$1,338,956)	(\$1,376,447)	(\$1,414,987)	(\$1,454,607)	(\$1,495,336)	(\$1,537,205)		
Less Misc. Operating Expenses			(\$3,864,418)	(\$6,356,195)	(\$7,841,002)	(\$8,060,550)	(\$8,286,245)	(\$8,518,260)	(\$8,756,771)	(\$9,001,961)	(\$9,254,016)	(\$9,513,128)	(\$9,779,496)	(\$10,053,322)		
NET OPERATING INCOME (before debt service and replacement reserves)		\$0	\$10,316,932	\$16,969,290	\$20,933,317	\$21,519,450	\$22,121,994	\$22,741,410	\$23,378,169	\$24,032,758	\$24,705,675	\$25,397,434	\$26,108,563	\$26,839,602		
less Debt Service*																
less Advance Developer Cash Equity																
CASH FLOW AVAILABLE (after debt & equity)																
Sale or Refinance in Year 10																\$509,952,000
NET PROFIT (before depreciation & taxes)																

Supportable Debt (Construction-Permanent Loan)	
Supportable Annual Payment (@125% coverage)	\$20,933,317
Supportable Debt @4.0% interest, 20-year term	\$284,491,000

Supportable Equity (for-profit developer)	
Targeted Return on Investment & Overhead	6.0%
Net present value of net profit (equity)	\$230,747,000

Residual Land Value Analysis	For-Profit Developer
Supportable Debt	\$284,491,000
Supportable Equity	\$230,747,000
Less Debt Principal in Yr. 12	(\$140,938,876)
Subtotal Debt + Equity - Primary Loan Amt.	\$374,299,124
Construction Cost	(\$359,463,943)
Residual Land Value	\$14,835,181
Residual Land Value per Dwelling Unit	\$12,199
Residual Land Value per Acre	\$942,515
Residual Land Value per SqFt of Land Area	\$22
Ratio of Land Value to Improvement Cost	0.04
Avg. Density (dwellings per acre)	77
Site Size (acres)	15.7
Site Size (sqft)	685,634

SUMMARY of Revenue Assumptions	
Year 12 Sale or Refinance Fees/Costs	5.0%
Cap Rate	5.0%
Year 12 Sale or Refinance Value	\$509,952,000
Annual Rent Rate escalation	2.8%
Annual Op. Expense Rate escalation	2.8%

Assessed Value & City Property Tax Created	
Project Improvement Value	\$359,463,943
Project Land Value	\$14,835,181
Project Total Value	\$374,299,124
Assessed Value to Market Value Ratio	90%
Estimated Assessed Value	\$336,869,211
Property Tax Rate per \$1,000 AV	\$11.70
Net New AV Created	\$323,517,549
Annual Value of Tax Payments	\$3,785,000
Annual Net New City Tax Revenue	\$292,010

Source: FCS GROUP, based on assumptions stated in Appendix.

Appendix D: Detailed 30-Year Fiscal Impact Analysis

344th Site

	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
State Shared Revenue															
Motor Vehicle Fuel Tax	\$17,927	\$18,016	\$18,107	\$18,197	\$18,288	\$18,379	\$18,471	\$18,564	\$18,657	\$18,750	\$37,687	\$37,876	\$38,065	\$38,255	\$38,447
Multi-Modal Distribution	\$1,197	\$1,203	\$1,209	\$1,215	\$1,221	\$1,227	\$1,233	\$1,239	\$1,246	\$1,252	\$2,504	\$2,516	\$2,529	\$2,541	\$2,554
Increased MVFT	\$1,045	\$1,050	\$1,056	\$1,061	\$1,066	\$1,071	\$1,077	\$1,082	\$1,088	\$1,093	\$2,186	\$2,197	\$2,208	\$2,219	\$2,230
Liquor Profits	\$7,056	\$7,092	\$7,127	\$7,163	\$7,199	\$7,235	\$7,271	\$7,307	\$7,344	\$7,380	\$14,761	\$14,835	\$14,909	\$14,983	\$15,058
Liquor Excise	\$5,056	\$5,081	\$5,106	\$5,132	\$5,157	\$5,183	\$5,209	\$5,235	\$5,261	\$5,288	\$10,575	\$10,628	\$10,681	\$10,735	\$10,788
Criminal Justice Distribution	\$1,045	\$1,050	\$1,056	\$1,061	\$1,066	\$1,071	\$1,077	\$1,082	\$1,088	\$1,093	\$2,186	\$2,197	\$2,208	\$2,219	\$2,230
Subtotal State Shared Revenue	\$33,326	\$33,492	\$33,660	\$33,828	\$33,997	\$34,167	\$34,338	\$34,510	\$34,682	\$34,856	\$69,899	\$70,249	\$70,600	\$70,953	\$71,308
Property Tax Revenue															
School	\$608,063	\$614,143	\$620,285	\$626,487	\$632,752	\$639,080	\$645,471	\$651,925	\$658,445	\$665,029	\$1,343,359	\$1,356,792	\$1,370,360	\$1,384,064	\$1,397,904
City	\$151,171	\$152,683	\$154,210	\$155,752	\$157,309	\$158,882	\$160,471	\$162,076	\$163,697	\$165,334	\$333,974	\$337,314	\$340,687	\$344,094	\$347,535
Port District	\$20,071	\$20,272	\$20,474	\$20,679	\$20,886	\$21,095	\$21,306	\$21,519	\$21,734	\$21,951	\$44,342	\$44,785	\$45,233	\$45,685	\$46,142
County	\$208,830	\$210,919	\$213,028	\$215,158	\$217,310	\$219,483	\$221,677	\$223,894	\$226,133	\$228,395	\$461,357	\$465,971	\$470,630	\$475,337	\$480,090
State School Fund	\$517,224	\$522,396	\$527,620	\$532,896	\$538,225	\$543,607	\$549,043	\$554,534	\$560,079	\$565,680	\$1,142,673	\$1,154,100	\$1,165,641	\$1,177,297	\$1,189,070
Sound Transit	\$33,009	\$33,339	\$33,673	\$34,009	\$34,349	\$34,693	\$35,040	\$35,390	\$35,744	\$36,102	\$72,925	\$73,654	\$74,391	\$75,135	\$75,886
Flood	\$14,921	\$15,070	\$15,221	\$15,373	\$15,527	\$15,682	\$15,839	\$15,997	\$16,157	\$16,319	\$32,964	\$33,294	\$33,627	\$33,963	\$34,303
EMS	\$44,381	\$44,825	\$45,273	\$45,726	\$46,183	\$46,645	\$47,111	\$47,583	\$48,058	\$48,539	\$98,049	\$99,029	\$100,019	\$101,020	\$102,030
Library	\$59,846	\$60,445	\$61,049	\$61,660	\$62,276	\$62,899	\$63,528	\$64,163	\$64,805	\$65,453	\$132,215	\$133,538	\$134,873	\$136,222	\$137,584
Fire	\$301,825	\$304,843	\$307,891	\$310,970	\$314,080	\$317,221	\$320,393	\$323,597	\$326,833	\$330,101	\$666,804	\$673,473	\$680,207	\$687,009	\$693,879
Subtotal Property Tax Revenue	\$1,959,341	\$1,978,934	\$1,998,724	\$2,018,711	\$2,038,898	\$2,059,287	\$2,079,880	\$2,100,679	\$2,121,685	\$2,142,902	\$4,328,662	\$4,371,949	\$4,415,669	\$4,459,825	\$4,504,424
Sales Tax Revenue															
Federal Way Sales Tax Revenue	\$193,529	\$193,529	\$193,529	\$193,529	\$193,529	\$193,529	\$193,529	\$193,529	\$193,529	\$193,529	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809
State & County Sales Tax Revenue	\$2,106,047	\$2,106,047	\$2,106,047	\$2,106,047	\$2,106,047	\$2,106,047	\$2,106,047	\$2,106,047	\$2,106,047	\$2,106,047	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515
Subtotal Sales Tax Revenue	\$2,299,575	\$2,299,575	\$2,299,575	\$2,299,575	\$2,299,575	\$2,299,575	\$2,299,575	\$2,299,575	\$2,299,575	\$2,299,575	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324
Subtotal Federal Way Revenue	\$378,026	\$379,704	\$381,398	\$383,109	\$384,835	\$386,578	\$388,338	\$390,114	\$391,908	\$393,718	\$534,683	\$538,372	\$542,096	\$545,856	\$549,652
Subtotal Other Government Revenue	\$3,914,216	\$3,932,298	\$3,950,561	\$3,969,006	\$3,987,635	\$4,006,451	\$4,025,455	\$4,044,649	\$4,064,035	\$4,083,615	\$5,418,203	\$5,458,150	\$5,498,497	\$5,539,246	\$5,580,404
Total Revenue	\$4,292,242	\$4,312,002	\$4,331,959	\$4,352,114	\$4,372,471	\$4,393,030	\$4,413,793	\$4,434,764	\$4,455,943	\$4,477,333	\$5,952,886	\$5,996,522	\$6,040,593	\$6,085,102	\$6,130,055

344th Site

	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	Total
State Shared Revenue																
Motor Vehicle Fuel Tax	\$38,639	\$38,832	\$39,026	\$39,221	\$39,417	\$39,615	\$39,813	\$40,012	\$40,212	\$40,413	\$40,615	\$40,818	\$41,022	\$41,227	\$41,433	\$974,000
Multi-Modal Distribution	\$2,567	\$2,580	\$2,593	\$2,606	\$2,619	\$2,632	\$2,645	\$2,658	\$2,671	\$2,685	\$2,698	\$2,712	\$2,725	\$2,739	\$2,753	\$64,768
Increased MVFT	\$2,241	\$2,252	\$2,264	\$2,275	\$2,286	\$2,298	\$2,309	\$2,321	\$2,333	\$2,344	\$2,356	\$2,368	\$2,380	\$2,391	\$2,403	\$56,551
Liquor Profits	\$15,133	\$15,209	\$15,285	\$15,362	\$15,438	\$15,516	\$15,593	\$15,671	\$15,749	\$15,828	\$15,907	\$15,987	\$16,067	\$16,147	\$16,228	\$381,840
Liquor Excise	\$10,842	\$10,897	\$10,951	\$11,006	\$11,061	\$11,116	\$11,172	\$11,228	\$11,284	\$11,340	\$11,397	\$11,454	\$11,511	\$11,569	\$11,627	\$273,571
Criminal Justice Distribution	\$2,241	\$2,252	\$2,264	\$2,275	\$2,286	\$2,298	\$2,309	\$2,321	\$2,333	\$2,344	\$2,356	\$2,368	\$2,380	\$2,391	\$2,403	\$56,551
Subtotal State Shared Revenue	\$71,664	\$72,023	\$72,383	\$72,745	\$73,108	\$73,474	\$73,841	\$74,210	\$74,581	\$74,954	\$75,329	\$75,706	\$76,084	\$76,465	\$76,847	\$1,807,280
Property Tax Revenue																
School	\$1,411,884	\$1,426,002	\$1,440,262	\$1,454,665	\$1,469,212	\$1,483,904	\$1,498,743	\$1,513,730	\$1,528,868	\$1,544,156	\$1,559,598	\$1,575,194	\$1,590,946	\$1,606,855	\$1,622,924	\$35,941,101
City	\$351,010	\$354,520	\$358,065	\$361,646	\$365,262	\$368,915	\$372,604	\$376,330	\$380,093	\$383,894	\$387,733	\$391,611	\$395,527	\$399,482	\$403,477	\$8,935,357
Port District	\$46,604	\$47,070	\$47,541	\$48,016	\$48,496	\$48,981	\$49,471	\$49,966	\$50,465	\$50,970	\$51,480	\$51,994	\$52,514	\$53,039	\$53,570	\$1,186,352
County	\$484,891	\$489,740	\$494,637	\$499,583	\$504,579	\$509,625	\$514,721	\$519,869	\$525,067	\$530,318	\$535,621	\$540,977	\$546,387	\$551,851	\$557,369	\$12,343,447
State School Fund	\$1,200,961	\$1,212,971	\$1,225,100	\$1,237,351	\$1,249,725	\$1,262,222	\$1,274,844	\$1,287,593	\$1,300,469	\$1,313,473	\$1,326,608	\$1,339,874	\$1,353,273	\$1,366,806	\$1,380,474	\$30,571,829
Sound Transit	\$76,645	\$77,411	\$78,186	\$78,967	\$79,757	\$80,555	\$81,360	\$82,174	\$82,996	\$83,826	\$84,664	\$85,510	\$86,366	\$87,229	\$88,101	\$1,951,086
Flood	\$34,646	\$34,992	\$35,342	\$35,695	\$36,052	\$36,413	\$36,777	\$37,145	\$37,516	\$37,891	\$38,270	\$38,653	\$39,040	\$39,430	\$39,824	\$881,943
EMS	\$103,050	\$104,081	\$105,121	\$106,173	\$107,234	\$108,307	\$109,390	\$110,484	\$111,589	\$112,704	\$113,832	\$114,970	\$116,120	\$117,281	\$118,454	\$2,623,260
Library	\$138,960	\$140,349	\$141,753	\$143,170	\$144,602	\$146,048	\$147,508	\$148,984	\$150,473	\$151,978	\$153,498	\$155,033	\$156,583	\$158,149	\$159,731	\$3,537,376
Fire	\$700,818	\$707,826	\$714,905	\$722,054	\$729,274	\$736,567	\$743,933	\$751,372	\$758,886	\$766,475	\$774,139	\$781,881	\$789,700	\$797,597	\$805,572	\$17,840,125
Subtotal Property Tax Revenue	\$4,549,468	\$4,594,962	\$4,640,912	\$4,687,321	\$4,734,194	\$4,781,536	\$4,829,352	\$4,877,645	\$4,926,422	\$4,975,686	\$5,025,443	\$5,075,697	\$5,126,454	\$5,177,719	\$5,229,496	\$115,811,876
Sales Tax Revenue																
Federal Way Sales Tax Revenue	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$130,809	\$4,551,476
State & County Sales Tax Revenue	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$1,423,515	\$49,530,763
Subtotal Sales Tax Revenue	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$1,554,324	\$54,082,239
Subtotal Federal Way Revenue	\$553,484	\$557,352	\$561,257	\$565,200	\$569,180	\$573,198	\$577,255	\$581,350	\$585,484	\$589,658	\$593,872	\$598,126	\$602,421	\$606,756	\$611,133	\$15,294,113
Subtotal Other Government Revenue	\$5,621,973	\$5,663,957	\$5,706,362	\$5,749,190	\$5,792,447	\$5,836,136	\$5,880,262	\$5,924,830	\$5,969,843	\$6,015,306	\$6,061,224	\$6,107,601	\$6,154,442	\$6,201,751	\$6,249,534	\$156,407,282
Total Revenue	\$6,175,456	\$6,221,309	\$6,267,619	\$6,314,390	\$6,361,627	\$6,409,334	\$6,457,517	\$6,506,180	\$6,555,327	\$6,604,964	\$6,655,096	\$6,705,727	\$6,756,863	\$6,808,508	\$6,860,667	\$171,701,395

CFC Site	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
State Shared Revenue															
Motor Vehicle Fuel Tax	\$18,328	\$18,420	\$18,512	\$18,605	\$18,698	\$18,791	\$18,885	\$18,979	\$19,074	\$19,170	\$38,339	\$38,531	\$38,724	\$38,917	\$39,112
Multi-Modal Distribution	\$1,224	\$1,230	\$1,236	\$1,242	\$1,248	\$1,255	\$1,261	\$1,267	\$1,274	\$1,280	\$2,560	\$2,573	\$2,585	\$2,598	\$2,611
Increased MVFT	\$1,068	\$1,074	\$1,079	\$1,085	\$1,090	\$1,095	\$1,101	\$1,106	\$1,112	\$1,118	\$2,235	\$2,246	\$2,257	\$2,269	\$2,280
Liquor Profits	\$7,214	\$7,250	\$7,287	\$7,323	\$7,360	\$7,397	\$7,434	\$7,471	\$7,508	\$7,546	\$15,091	\$15,167	\$15,243	\$15,319	\$15,395
Liquor Excise	\$5,169	\$5,195	\$5,221	\$5,247	\$5,273	\$5,299	\$5,326	\$5,352	\$5,379	\$5,406	\$10,812	\$10,866	\$10,921	\$10,975	\$11,030
Criminal Justice Distribution	\$1,068	\$1,074	\$1,079	\$1,085	\$1,090	\$1,095	\$1,101	\$1,106	\$1,112	\$1,118	\$2,235	\$2,246	\$2,257	\$2,269	\$2,280
Subtotal State Shared Revenue	\$34,072	\$34,242	\$34,414	\$34,586	\$34,759	\$34,932	\$35,107	\$35,283	\$35,459	\$35,636	\$71,273	\$71,629	\$71,987	\$72,347	\$72,709
Property Tax Revenue															
School	\$595,207	\$601,159	\$607,171	\$613,242	\$619,375	\$625,568	\$631,824	\$638,142	\$644,524	\$650,969	\$1,314,958	\$1,328,107	\$1,341,388	\$1,354,802	\$1,368,350
City	\$147,975	\$149,455	\$150,949	\$152,459	\$153,983	\$155,523	\$157,079	\$158,649	\$160,236	\$161,838	\$326,913	\$330,182	\$333,484	\$336,819	\$340,187
Port District	\$19,647	\$19,843	\$20,042	\$20,242	\$20,444	\$20,649	\$20,855	\$21,064	\$21,275	\$21,487	\$43,404	\$43,838	\$44,277	\$44,720	\$45,167
County	\$204,415	\$206,459	\$208,524	\$210,609	\$212,715	\$214,842	\$216,991	\$219,161	\$221,352	\$223,566	\$451,603	\$456,119	\$460,680	\$465,287	\$469,940
State School Fund	\$506,288	\$511,351	\$516,465	\$521,630	\$526,846	\$532,114	\$537,435	\$542,810	\$548,238	\$553,720	\$1,118,515	\$1,129,700	\$1,140,997	\$1,152,407	\$1,163,931
Sound Transit	\$32,311	\$32,634	\$32,961	\$33,290	\$33,623	\$33,959	\$34,299	\$34,642	\$34,988	\$35,338	\$71,383	\$72,097	\$72,818	\$73,546	\$74,282
Flood	\$14,606	\$14,752	\$14,899	\$15,048	\$15,199	\$15,351	\$15,504	\$15,659	\$15,816	\$15,974	\$32,267	\$32,590	\$32,916	\$33,245	\$33,577
EMS	\$43,443	\$43,877	\$44,316	\$44,759	\$45,207	\$45,659	\$46,115	\$46,577	\$47,042	\$47,513	\$95,976	\$96,936	\$97,905	\$98,884	\$99,873
Library	\$58,581	\$59,167	\$59,759	\$60,356	\$60,960	\$61,569	\$62,185	\$62,807	\$63,435	\$64,069	\$129,420	\$130,714	\$132,021	\$133,342	\$134,675
Fire	\$295,444	\$298,398	\$301,382	\$304,396	\$307,440	\$310,514	\$313,619	\$316,755	\$319,923	\$323,122	\$652,707	\$659,234	\$665,826	\$672,485	\$679,209
Subtotal Property Tax Revenue	\$1,917,917	\$1,937,096	\$1,956,467	\$1,976,031	\$1,995,792	\$2,015,750	\$2,035,907	\$2,056,266	\$2,076,829	\$2,097,597	\$4,237,146	\$4,279,518	\$4,322,313	\$4,365,536	\$4,409,191
Sales Tax Revenue															
Federal Way Sales Tax Revenue	\$156,927	\$156,927	\$156,927	\$156,927	\$156,927	\$156,927	\$156,927	\$156,927	\$156,927	\$156,927	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023
State & County Sales Tax Revenue	\$1,707,731	\$1,707,731	\$1,707,731	\$1,707,731	\$1,707,731	\$1,707,731	\$1,707,731	\$1,707,731	\$1,707,731	\$1,707,731	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838
Subtotal Sales Tax Revenue	\$1,864,657	\$1,864,657	\$1,864,657	\$1,864,657	\$1,864,657	\$1,864,657	\$1,864,657	\$1,864,657	\$1,864,657	\$1,864,657	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861
Subtotal Federal Way Revenue	\$338,974	\$340,624	\$342,290	\$343,971	\$345,669	\$347,382	\$349,112	\$350,858	\$352,621	\$354,401	\$461,209	\$464,834	\$468,494	\$472,189	\$475,919
Subtotal Other Government Revenue	\$3,477,672	\$3,495,371	\$3,513,248	\$3,531,303	\$3,549,539	\$3,567,957	\$3,586,559	\$3,605,347	\$3,624,324	\$3,643,489	\$4,596,071	\$4,635,174	\$4,674,667	\$4,714,555	\$4,754,842
Total Revenue	\$3,816,646	\$3,835,995	\$3,855,537	\$3,875,274	\$3,895,207	\$3,915,339	\$3,935,671	\$3,956,206	\$3,976,945	\$3,997,890	\$5,057,280	\$5,100,008	\$5,143,161	\$5,186,744	\$5,230,761

CFC Site	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	Total
State Shared Revenue																
Motor Vehicle Fuel Tax	\$39,307	\$39,504	\$39,702	\$39,900	\$40,100	\$40,300	\$40,502	\$40,704	\$40,908	\$41,112	\$41,318	\$41,524	\$41,732	\$41,941	\$42,150	\$991,787
Multi-Modal Distribution	\$2,624	\$2,638	\$2,651	\$2,664	\$2,677	\$2,691	\$2,704	\$2,718	\$2,731	\$2,745	\$2,759	\$2,772	\$2,786	\$2,800	\$2,814	\$66,218
Increased MVFT	\$2,291	\$2,303	\$2,314	\$2,326	\$2,338	\$2,349	\$2,361	\$2,373	\$2,385	\$2,397	\$2,409	\$2,421	\$2,433	\$2,445	\$2,457	\$57,817
Liquor Profits	\$15,472	\$15,550	\$15,627	\$15,706	\$15,784	\$15,863	\$15,942	\$16,022	\$16,102	\$16,183	\$16,264	\$16,345	\$16,427	\$16,509	\$16,591	\$390,389
Liquor Excise	\$11,085	\$11,141	\$11,196	\$11,252	\$11,309	\$11,365	\$11,422	\$11,479	\$11,536	\$11,594	\$11,652	\$11,710	\$11,769	\$11,828	\$11,887	\$279,697
Criminal Justice Distribution	\$2,291	\$2,303	\$2,314	\$2,326	\$2,338	\$2,349	\$2,361	\$2,373	\$2,385	\$2,397	\$2,409	\$2,421	\$2,433	\$2,445	\$2,457	\$57,817
Subtotal State Shared Revenue	\$73,072	\$73,438	\$73,805	\$74,174	\$74,545	\$74,917	\$75,292	\$75,669	\$76,047	\$76,427	\$76,809	\$77,193	\$77,579	\$77,967	\$78,357	\$1,843,726
Property Tax Revenue																
School	\$1,382,034	\$1,395,854	\$1,409,812	\$1,423,911	\$1,438,150	\$1,452,531	\$1,467,056	\$1,481,727	\$1,496,544	\$1,511,510	\$1,526,625	\$1,541,891	\$1,557,310	\$1,572,883	\$1,588,612	\$35,181,237
City	\$343,589	\$347,025	\$350,495	\$354,000	\$357,540	\$361,115	\$364,727	\$368,374	\$372,058	\$375,778	\$379,536	\$383,331	\$387,165	\$391,036	\$394,947	\$8,746,446
Port District	\$45,618	\$46,075	\$46,535	\$47,001	\$47,471	\$47,945	\$48,425	\$48,909	\$49,398	\$49,892	\$50,391	\$50,895	\$51,404	\$51,918	\$52,437	\$1,161,270
County	\$474,639	\$479,386	\$484,180	\$489,021	\$493,912	\$498,851	\$503,839	\$508,878	\$513,966	\$519,106	\$524,297	\$529,540	\$534,835	\$540,184	\$545,586	\$12,082,482
State School Fund	\$1,175,570	\$1,187,326	\$1,199,199	\$1,211,191	\$1,223,303	\$1,235,536	\$1,247,892	\$1,260,371	\$1,272,974	\$1,285,704	\$1,298,561	\$1,311,547	\$1,324,662	\$1,337,909	\$1,351,288	\$29,925,481
Sound Transit	\$75,025	\$75,775	\$76,533	\$77,298	\$78,071	\$78,852	\$79,640	\$80,437	\$81,241	\$82,053	\$82,874	\$83,703	\$84,540	\$85,385	\$86,239	\$1,909,836
Flood	\$33,913	\$34,252	\$34,595	\$34,941	\$35,290	\$35,643	\$35,999	\$36,359	\$36,723	\$37,090	\$37,461	\$37,836	\$38,214	\$38,596	\$38,982	\$863,297
EMS	\$100,872	\$101,880	\$102,899	\$103,928	\$104,967	\$106,017	\$107,077	\$108,148	\$109,229	\$110,322	\$111,425	\$112,539	\$113,665	\$114,801	\$115,949	\$2,567,799
Library	\$136,022	\$137,382	\$138,756	\$140,143	\$141,545	\$142,960	\$144,390	\$145,834	\$147,292	\$148,765	\$150,253	\$151,755	\$153,273	\$154,805	\$156,354	\$3,462,589
Fire	\$686,002	\$692,862	\$699,790	\$706,788	\$713,856	\$720,995	\$728,204	\$735,487	\$742,841	\$750,270	\$757,773	\$765,350	\$773,004	\$780,734	\$788,541	\$17,462,950
Subtotal Property Tax Revenue	\$4,453,283	\$4,497,816	\$4,542,794	\$4,588,222	\$4,634,104	\$4,680,445	\$4,727,250	\$4,774,522	\$4,822,268	\$4,870,490	\$4,919,195	\$4,968,387	\$5,018,071	\$5,068,252	\$5,118,934	\$113,363,388
Sales Tax Revenue																
Federal Way Sales Tax Revenue	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$63,023	\$2,829,725
State & County Sales Tax Revenue	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$685,838	\$30,794,070
Subtotal Sales Tax Revenue	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$748,861	\$33,623,796
Subtotal Federal Way Revenue	\$479,684	\$483,485	\$487,323	\$491,197	\$495,108	\$499,056	\$503,042	\$507,065	\$511,127	\$515,228	\$519,368	\$523,548	\$527,767	\$532,026	\$536,327	\$13,419,897
Subtotal Other Government Revenue	\$4,795,533	\$4,836,629	\$4,878,137	\$4,920,060	\$4,962,403	\$5,005,168	\$5,048,362	\$5,091,987	\$5,136,048	\$5,180,550	\$5,225,497	\$5,270,894	\$5,316,745	\$5,363,054	\$5,409,826	\$135,411,012
Total Revenue	\$5,275,217	\$5,320,115	\$5,365,460	\$5,411,257	\$5,457,510	\$5,504,224	\$5,551,403	\$5,599,052	\$5,647,176	\$5,695,779	\$5,744,866	\$5,794,442	\$5,844,511	\$5,895,080	\$5,946,152	\$148,830,910

Shared Area	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
State Shared Revenue															
Motor Vehicle Fuel Tax	\$18,509	\$18,601	\$18,694	\$18,788	\$18,882	\$18,976	\$19,071	\$19,166	\$19,262	\$19,359	\$38,717	\$38,911	\$39,105	\$39,301	\$39,497
Multi-Modal Distribution	\$1,236	\$1,242	\$1,248	\$1,254	\$1,261	\$1,267	\$1,273	\$1,280	\$1,286	\$1,293	\$2,585	\$2,598	\$2,611	\$2,624	\$2,637
Increased MVFT	\$1,079	\$1,084	\$1,090	\$1,095	\$1,101	\$1,106	\$1,112	\$1,117	\$1,123	\$1,129	\$2,257	\$2,268	\$2,280	\$2,291	\$2,303
Liquor Profits	\$7,285	\$7,322	\$7,359	\$7,395	\$7,432	\$7,469	\$7,507	\$7,544	\$7,582	\$7,620	\$15,240	\$15,316	\$15,393	\$15,470	\$15,547
Liquor Excise	\$5,220	\$5,246	\$5,272	\$5,298	\$5,325	\$5,352	\$5,378	\$5,405	\$5,432	\$5,459	\$10,919	\$10,973	\$11,028	\$11,083	\$11,139
Criminal Justice Distribution	\$1,079	\$1,084	\$1,090	\$1,095	\$1,101	\$1,106	\$1,112	\$1,117	\$1,123	\$1,129	\$2,257	\$2,268	\$2,280	\$2,291	\$2,303
Subtotal State Shared Revenue	\$34,408	\$34,580	\$34,753	\$34,927	\$35,101	\$35,277	\$35,453	\$35,630	\$35,808	\$35,988	\$71,975	\$72,335	\$72,697	\$73,060	\$73,425
Property Tax Revenue															
School	\$593,325	\$599,259	\$605,251	\$611,304	\$617,417	\$623,591	\$629,827	\$636,125	\$642,486	\$648,911	\$1,310,801	\$1,323,909	\$1,337,148	\$1,350,519	\$1,364,024
City	\$147,507	\$148,982	\$150,472	\$151,977	\$153,497	\$155,032	\$156,582	\$158,148	\$159,729	\$161,327	\$325,880	\$329,138	\$332,430	\$335,754	\$339,112
Port District	\$19,585	\$19,780	\$19,978	\$20,178	\$20,380	\$20,584	\$20,789	\$20,997	\$21,207	\$21,419	\$43,267	\$43,700	\$44,137	\$44,578	\$45,024
County	\$203,769	\$205,807	\$207,865	\$209,943	\$212,043	\$214,163	\$216,305	\$218,468	\$220,653	\$222,859	\$450,175	\$454,677	\$459,224	\$463,816	\$468,454
State School Fund	\$504,688	\$509,735	\$514,832	\$519,981	\$525,180	\$530,432	\$535,736	\$541,094	\$546,505	\$551,970	\$1,114,979	\$1,126,129	\$1,137,390	\$1,148,764	\$1,160,252
Sound Transit	\$32,209	\$32,531	\$32,856	\$33,185	\$33,517	\$33,852	\$34,191	\$34,532	\$34,878	\$35,227	\$71,158	\$71,869	\$72,588	\$73,314	\$74,047
Flood	\$14,559	\$14,705	\$14,852	\$15,001	\$15,151	\$15,302	\$15,455	\$15,610	\$15,766	\$15,923	\$32,165	\$32,487	\$32,812	\$33,140	\$33,471
EMS	\$43,305	\$43,739	\$44,176	\$44,618	\$45,064	\$45,514	\$45,970	\$46,429	\$46,894	\$47,363	\$95,672	\$96,629	\$97,595	\$98,571	\$99,557
Library	\$58,396	\$58,980	\$59,570	\$60,165	\$60,767	\$61,375	\$61,988	\$62,608	\$63,234	\$63,867	\$129,011	\$130,301	\$131,604	\$132,920	\$134,249
Fire	\$294,510	\$297,455	\$300,429	\$303,434	\$306,468	\$309,533	\$312,628	\$315,754	\$318,912	\$322,101	\$650,644	\$657,150	\$663,722	\$670,359	\$677,062
Subtotal Property Tax Revenue	\$1,911,854	\$1,930,972	\$1,950,282	\$1,969,785	\$1,989,483	\$2,009,377	\$2,029,471	\$2,049,766	\$2,070,264	\$2,090,966	\$4,223,752	\$4,265,989	\$4,308,649	\$4,351,736	\$4,395,253
Sales Tax Revenue															
Federal Way Sales Tax Revenue	\$147,869	\$147,869	\$147,869	\$147,869	\$147,869	\$147,869	\$147,869	\$147,869	\$147,869	\$147,869	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701
State & County Sales Tax Revenue	\$1,703,416	\$1,703,416	\$1,703,416	\$1,703,416	\$1,703,416	\$1,703,416	\$1,703,416	\$1,703,416	\$1,703,416	\$1,703,416	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333
Subtotal Sales Tax Revenue	\$1,851,285	\$1,851,285	\$1,851,285	\$1,851,285	\$1,851,285	\$1,851,285	\$1,851,285	\$1,851,285	\$1,851,285	\$1,851,285	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034
Subtotal Federal Way Revenue	\$329,784	\$331,431	\$333,094	\$334,772	\$336,467	\$338,177	\$339,904	\$341,647	\$343,407	\$345,183	\$443,555	\$447,174	\$450,827	\$454,515	\$458,238
Subtotal Other Government Revenue	\$3,467,762	\$3,485,406	\$3,503,226	\$3,521,224	\$3,539,402	\$3,557,762	\$3,576,305	\$3,595,034	\$3,613,950	\$3,633,056	\$4,395,205	\$4,434,184	\$4,473,552	\$4,513,314	\$4,553,474
Total Revenue	\$3,797,547	\$3,816,837	\$3,836,320	\$3,855,996	\$3,875,869	\$3,895,939	\$3,916,209	\$3,936,681	\$3,957,357	\$3,978,239	\$4,838,760	\$4,881,358	\$4,924,379	\$4,967,829	\$5,011,712

Shared Area	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	Total
State Shared Revenue																
Motor Vehicle Fuel Tax	\$39,695	\$39,893	\$40,093	\$40,293	\$40,495	\$40,697	\$40,901	\$41,105	\$41,311	\$41,517	\$41,725	\$41,933	\$42,143	\$42,354	\$42,566	\$1,001,561
Multi-Modal Distribution	\$2,650	\$2,664	\$2,677	\$2,690	\$2,704	\$2,717	\$2,731	\$2,744	\$2,758	\$2,772	\$2,786	\$2,800	\$2,814	\$2,828	\$2,842	\$66,871
Increased MVFT	\$2,314	\$2,326	\$2,337	\$2,349	\$2,361	\$2,372	\$2,384	\$2,396	\$2,408	\$2,420	\$2,432	\$2,445	\$2,457	\$2,469	\$2,481	\$58,387
Liquor Profits	\$15,625	\$15,703	\$15,781	\$15,860	\$15,940	\$16,019	\$16,099	\$16,180	\$16,261	\$16,342	\$16,424	\$16,506	\$16,588	\$16,671	\$16,755	\$394,237
Liquor Excise	\$11,194	\$11,250	\$11,307	\$11,363	\$11,420	\$11,477	\$11,535	\$11,592	\$11,650	\$11,708	\$11,767	\$11,826	\$11,885	\$11,944	\$12,004	\$282,453
Criminal Justice Distribution	\$2,314	\$2,326	\$2,337	\$2,349	\$2,361	\$2,372	\$2,384	\$2,396	\$2,408	\$2,420	\$2,432	\$2,445	\$2,457	\$2,469	\$2,481	\$58,387
Subtotal State Shared Revenue	\$73,792	\$74,161	\$74,532	\$74,905	\$75,279	\$75,656	\$76,034	\$76,414	\$76,796	\$77,180	\$77,566	\$77,954	\$78,344	\$78,736	\$79,129	\$1,861,896
Property Tax Revenue																
School	\$1,377,665	\$1,391,441	\$1,405,356	\$1,419,409	\$1,433,603	\$1,447,939	\$1,462,419	\$1,477,043	\$1,491,813	\$1,506,732	\$1,521,799	\$1,537,017	\$1,552,387	\$1,567,911	\$1,583,590	\$35,070,022
City	\$342,503	\$345,928	\$349,387	\$352,881	\$356,410	\$359,974	\$363,574	\$367,209	\$370,881	\$374,590	\$378,336	\$382,119	\$385,941	\$389,800	\$393,698	\$8,718,797
Port District	\$45,474	\$45,929	\$46,388	\$46,852	\$47,321	\$47,794	\$48,272	\$48,755	\$49,242	\$49,735	\$50,232	\$50,734	\$51,242	\$51,754	\$52,272	\$1,157,599
County	\$473,139	\$477,870	\$482,649	\$487,475	\$492,350	\$497,274	\$502,246	\$507,269	\$512,342	\$517,465	\$522,640	\$527,866	\$533,145	\$538,476	\$543,861	\$12,044,287
State School Fund	\$1,171,854	\$1,183,573	\$1,195,408	\$1,207,363	\$1,219,436	\$1,231,631	\$1,243,947	\$1,256,386	\$1,268,950	\$1,281,640	\$1,294,456	\$1,307,401	\$1,320,475	\$1,333,679	\$1,347,016	\$29,830,881
Sound Transit	\$74,787	\$75,535	\$76,291	\$77,054	\$77,824	\$78,602	\$79,388	\$80,182	\$80,984	\$81,794	\$82,612	\$83,438	\$84,272	\$85,115	\$85,966	\$1,903,799
Flood	\$33,806	\$34,144	\$34,485	\$34,830	\$35,179	\$35,530	\$35,886	\$36,245	\$36,607	\$36,973	\$37,343	\$37,716	\$38,093	\$38,474	\$38,859	\$860,568
EMS	\$100,553	\$101,558	\$102,574	\$103,599	\$104,635	\$105,682	\$106,739	\$107,806	\$108,884	\$109,973	\$111,073	\$112,183	\$113,305	\$114,438	\$115,583	\$2,559,681
Library	\$135,592	\$136,948	\$138,317	\$139,700	\$141,097	\$142,508	\$143,933	\$145,373	\$146,826	\$148,295	\$149,778	\$151,275	\$152,788	\$154,316	\$155,859	\$3,451,643
Fire	\$683,833	\$690,671	\$697,578	\$704,554	\$711,599	\$718,715	\$725,903	\$733,162	\$740,493	\$747,898	\$755,377	\$762,931	\$770,560	\$778,266	\$786,048	\$17,407,747
Subtotal Property Tax Revenue	\$4,439,206	\$4,483,598	\$4,528,434	\$4,573,718	\$4,619,455	\$4,665,650	\$4,712,306	\$4,759,429	\$4,807,023	\$4,855,094	\$4,903,645	\$4,952,681	\$5,002,208	\$5,052,230	\$5,102,752	\$113,005,026
Sales Tax Revenue																
Federal Way Sales Tax Revenue	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$45,701	\$2,392,707
State & County Sales Tax Revenue	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$497,333	\$26,980,815
Subtotal Sales Tax Revenue	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$543,034	\$29,373,522
Subtotal Federal Way Revenue	\$461,996	\$465,790	\$469,620	\$473,487	\$477,390	\$481,331	\$485,309	\$489,324	\$493,379	\$497,471	\$501,603	\$505,774	\$509,985	\$514,236	\$518,528	\$12,973,401
Subtotal Other Government Revenue	\$4,594,035	\$4,635,002	\$4,676,379	\$4,718,170	\$4,760,378	\$4,803,008	\$4,846,065	\$4,889,553	\$4,933,475	\$4,977,836	\$5,022,641	\$5,067,894	\$5,113,600	\$5,159,763	\$5,206,387	\$131,267,043
Total Revenue	\$5,056,032	\$5,100,793	\$5,145,999	\$5,191,656	\$5,237,768	\$5,284,339	\$5,331,374	\$5,378,877	\$5,426,853	\$5,475,308	\$5,524,244	\$5,573,669	\$5,623,585	\$5,673,999	\$5,724,915	\$144,240,444

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**Operations and Maintenance Facility South
Draft EIS
Conceptual Design Review Comments**

Organization: Seattle Public Utilities

Date: March 25, 2021

ID	Draft Version	Section/Dwg No.	Page/Sheet No.	Line/Exhibit No.	Comment	Organization / Firm	Commenter's Name
1	Draft	03/10/21 Presentation		N/A	Per ST presentation, ST's Preferred Alternative will not define a Midway option. In selecting a preferred alternative, what will ST assume for the cost and impact at Midway? Will the Midway alternative utilized for preferred alternative selection therefore assume max cost and impact or average cost and impact of the options?	SPU	SPU Team
2	Draft	DEIS	General	N/A	Ground settlement appears to be a primary driver in the selection of Midway Landfill foundation and site preparation alternatives evaluated. All three of the selected alternatives heavily favor mitigating settlement through upfront capital improvements in lieu of mitigation through operation and maintenance. The Preliminary Geotechnical Engineering Services Report (GeoEngineers, May 6, 2019) indicates that abrupt differential settlement over the landfill is unlikely in its current condition. Additionally, actual landfill settlement observed since then has been lower than what was predicted. Site preparation for the Forest Street OMF tracks consisted of mixing 3 to 4 feet of surficial soil with cement, while ongoing settlement of the tracks is managed via hand tamping of the tracks every 3-12 months. The approach to managing track settlement through maintenance has not resulted in impacts to the overhead contact system according to Paul Denison of Sound Transit during the August 13, 2019 Midway Landfill Site Settlement Workshop. Given the high cost of proposed site prep/foundation alternatives at the Midway Landfill, would it be more economical to construct a geosynthetic reinforced subgrade beneath the tracks/parking areas and manage ongoing settlement through maintenance similar to what is done at the Forest Street OMF?	SPU	SPU Team
3	Draft	DEIS	General	N/A	There will be a considerable and varying depth of fill (up to 80 feet or more in some areas) necessary for Options 2 and 3, the full excavation/replace and hybrid options. Recycled soil screened from the landfill will be variable in composition and moisture content, making compaction control difficult to achieve when constructing this embankment. This would be true even if the material was blended with better quality imported soil as was done along I-5. Even under ideal fill and compaction conditions, it is reasonable to expect embankment fills to settle by about ¼ to ½% of their thickness (for an 80-foot thick embankment, this would be about 2 to 5 inches). Fine-grained soil placed at sub-optimum moisture content would probably result in settlement at a higher percentage (perhaps ½ to 1% or even more) of the embankment thickness. Considering that much of the soil within the landfill is fine-grained, this settlement would likely occur for a long period of time after construction, with total settlements approaching a foot and differential settlement on the order of several inches. Given the tight settlement tolerances desired by ST, I suggest investigating self-compression of the fill for Options 2 and 3, and its impact on the performance of these options.	SPU	SPU Team
4	Draft	DEIS	General	N/A	There would likely be no delay or cost due to appeals or lawsuits at Midway, should that be included as a consideration?	SPU	SPU Team
5	Draft	DEIS	General	N/A	Are local traffic impacts generated by the 470 employees considered in the DEIS?	SPU	SPU Team
6	Draft	DEIS	General	N/A	The landfill cap is designed to significantly reduce surface water infiltration if not prevent it. Multiple locations in the EIS text and appendices state that the cap reduces infiltration, but it is designed to prevent it. The description in Page 3.11-12 is the most accurate. Descriptions that say 'low-infiltration cap' should be revised to 'impervious cap'.	SPU	SPU Team
7	Draft	DEIS	2-29	N/A	Costs for real estate and relocation for the Midway alternative seem high. What do they include? What has been assumed regarding purchase and sale of the landfill property from SPU?	SPU	SPU Team

Operations and Maintenance Facility South

Draft EIS

Conceptual Design Review Comments

Organization: Seattle Public Utilities

Date: March 25, 2021

ID	Draft Version	Section/Dwg No.	Page/Sheet No.	Line/Exhibit No.	Comment	Organization / Firm	Committer's Name
8	Draft	DEIS	2-29	N/A	Why is the annual Operating Est at Midway so much higher than the other alts? If this is for landfill gas system, how does it compare to current landfill O&M costs? Why is the annual operating cost estimate the same for all Midway Landfill options?	SPU	SPU Team
9	Draft	DEIS	3.10-13	N/A	Statement: "Compared with other alternatives, the Midway Landfill Alternative would convert more pervious land cover to impervious" - this is misleading due to the existing landfill cap. The entire Midway Landfill site is currently impervious, due to the existing landfill cap. The grass surface would reduce peak flow, but all runoff ends up in the existing stormwater pond. It may be unlikely-significant additional detention would be required in OMFS design.	SPU	SPU Team
10	Draft	DEIS	3.11-11-12	N/A	Midway landfill cap should be treated as existing impervious. 3.11-12 describes that a conservative assumption has been used that the surface is all grass and will have highest amount of conversion to impervious - the section also acknowledges the landfill cap. The assumption of grass and conversion to impervious is inappropriate.	SPU	SPU Team
11	Draft	DEIS	3.11-13	N/A	A slab and beam system in the Hybrid design option wouldn't partially impede long-term monitoring as long as monitoring wells are left accessible or replaced. Also the portion of the statement about improving local groundwater quality and the cover system by bringing it up to current protection standards is not accurate. The cover system is functioning and protective per current standards already. Potential improvement of groundwater quality is not related to improving the cover system. Potential improvement of groundwater quality may be related to refuse excavation of the hybrid and full excavation options.	SPU	SPU Team
12	Draft	DEIS	3.11-13	N/A	The drilled shafts and platform would be designed to prevent downward migration of groundwater and access for landfill gas system O&M. These considerations should not be put forward as risks. Also there is a statement that the project would bring the landfill cap system up to current protection standards. The existing landfill cap meets current protection standards.	SPU	SPU Team
13	Draft	DEIS	3.11-15	N/A	It should be noted that the waste excavation required for the hybrid and full removal alternatives is essentially equivalent. The text makes it sound like there is significantly less excavation for the hybrid.	SPU	SPU Team
14	Draft	DEIS	3.13-10	N/A	Would be appropriate to include discussion of how hazardous materials construction impacts were successfully mitigated at the FWLE here.	SPU	SPU Team
15	Draft	DEIS	3.13-9	N/A	This section talks about risk of potential uncontrolled release of methane gas from the landfill - as designed this will not occur - acknowledgement of the required and planned gas collection system should be added here. The risk of uncontrolled gas release should be different for the different Midway landfill options. Risk of uncontrolled gas release would be eliminated by the full excavation option.	SPU	SPU Team
16	Draft	DEIS	3.16-5	N/A	The text states "no archaeological resources were identified within the Midway Landfill Alternative area of impact", but then the landfill is identified as an archaeological resource on Table 3.16-1. Why?	SPU	SPU Team
17	Draft	DEIS	3-11-15	N/A	The construction impacts related to hazardous material can be mitigated. Transporting materials would be done under strict requirements and columns would be installed in a way to avoid contaminant mobilization.	SPU	SPU Team
18	Draft	DEIS	3-13-10	N/A	Same comment with respect to impacts from drilled shafts - risks can and should be mitigated.	SPU	SPU Team
19	Draft	DEIS	3-13-9	N/A	Vapor intrusion can be mitigated through sound engineering practices.	SPU	SPU Team
20	Draft	DEIS	Fig 3.11-3	N/A	This figure should have a special and different symbol for landfill cap - not a hydrologic soil group	SPU	SPU Team
21	Draft	DEIS App D4	General	N/A	Has the experience with waste removal during the FWLE been taken into consideration for this Human Health Risk Assessment? For example, the environmental professional has been collecting air monitoring data during the waste excavation-these data may be useful in risk assessment.	SPU	SPU Team

**Operations and Maintenance Facility South
Draft EIS
Conceptual Design Review Comments**

Organization: Seattle Public Utilities

Date: March 25, 2021

ID	Draft Version	Section/Dwg No.	Page/Sheet No.	Line/Exhibit No.	Comment	Organization / Firm	Commenter's Name
22	Draft	DEIS App D4	General	N/A	The vapor pathway described in the assessment does not exist if mitigation is competently designed, constructed and maintained. The risk to workers for collisions and contact with energized electrical components is more significant than the vapor exposure pathway. The waste removal options 2 and 3 further reduce risks by removing much of the source material.	SPU	SPU Team
23	Draft	DEIS App D2	14 paragraph 6	N/A	The 22 week construction window does not reflect the work process for the FWLE waste removal. This window can be expanded.	SPU	SPU Team
24	Draft	DEIS App D2	2.1-13	N/A	Why did the assumption that material screening will result in 50% of the landfill material for reuse change from the assumption used for the FWLE that 70% of the material would be reused? The FWLE portion of the landfill towards the east has the deepest refuse. The existing refuse gets shallower towards the west.	SPU	SPU Team
25	Draft	DEIS App D2	2.1-14	N/A	The EIS assumes that all volume in the landfill is refuse for their excavation calculations and that the clean cover material quantity is unknown. Clean cover soils over the landfill cap ranges from 2 to 4 feet and landfill overburden ranges from 4-14 feet above the refuse. These are significant enough quantities to be incorporated into the analysis.	SPU	SPU Team
26	Draft	DEIS App D2	2.6.1	N/A	Screened Waste from the FWLE project was shipped in open top 48 foot containers which is much more efficient.	SPU	SPU Team
27	Draft	DEIS App D2	2.7	N/A	The assumptions on density, etc. should reflect the FWLE experience instead of raw estimates.	SPU	SPU Team
28	Draft	DEIS App D2	5.0-45	N/A	Statement 3: "Costs to adjust OMF South design to address compatibility with the FWLE or modify FWLE." This statement should be modified now that OMF South options and FWLE are now compatible.	SPU	SPU Team
29	Draft	DEIS App D2	6.0	N/A	This OMFS/FWLE compatibility section appears to be outdated per comment above.	SPU	SPU Team
30	Draft	DEIS App D2	General	N/A	The assumptions regarding allowable open area 5 acre limit have no basis and lead to inefficiency in the project.	SPU	SPU Team
31	Draft	DEIS App D2	General	N/A	Trucking via 20 foot containers is unlikely and inefficient. For the FWLE project, screened out refuse was transported in 48 foot open top containers.	SPU	SPU Team
32	Draft	DEIS App D2	pg. 25 line 16	N/A	The 22 week construction window does not reflect the work process for the FWLE waste removal. This window can be expanded.	SPU	SPU Team
33	Draft	DEIS App D2	Section 7	N/A	The tolerances for settlement are not realistic. At face value they indicate that there would be no track leveling maintenance required for the first 50 years of facility operation. Many other facility elements will require replacement/renewal in that time frame - why is track leveling different.	SPU	SPU Team
34	Draft	DEIS App D2	Table 2.3	N/A	Truck trips should reflect the actual material data generated from the FWLE work completed to date.	SPU	SPU Team
35	Draft	DEIS App D3	2.6.2.1	N/A	The text states "The recommendations also concluded that a typical soil column at the Midway landfill could be composed of between 50-70 percent waste, which would correspond to between 30 and 50 percent soil that could be considered for reuse." These percentages should be compared to what was achieved for the FWLE track project.	SPU	SPU Team
36	Draft	DEIS App D3	Section 3.2	N/A	For both excavation options, future methane generation will be negligible and will likely only require a passive vent system to prevent gas migration. Additionally, O&M costs for these options would be much less than for the option in which waste remains in place.	SPU	SPU Team
37	Draft	DEIS App D4	2.1-10	N/A	The existing landfill cap has a geomembrane liner and is designed to prevent surface water infiltration (impermeable) rather than reducing infiltration as stated in this Site Setting section.	SPU	SPU Team

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From: Johnson, Rep. Jesse <Jesse.Johnson@leg.wa.gov>

Sent: Tuesday, March 9, 2021 10:46 AM

To: OMF South <OMFsouth@soundtransit.org>

Subject: Public Comment

Good morning,

When will the public comment on this project be held? After hearing from constituents in my district, I ask that this project not be considered in Federal Way. Thank you!

Best,

Jesse E. Johnson

State Representative | 30th Legislative District 369 John L O'Brien Building | Olympia, WA 98504 | 206-333-2989

Pronouns: He/Him/His

Jesse.Johnson@leg.wa.gov

Proudly serving: Algonia, Auburn, Des Moines, Federal Way, Milton, Pacific & Unincorporated King County

Sign up for email updates here: <https://housedemocrats.wa.gov/johnson/>

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APPENDIX B

Comments from Businesses and Community Groups

COMMENTS FROM BUSINESSES AND COMMUNITY GROUPS

Businesses:

- Jameson Pepple Cantu PLLC, on behalf of the Christian Faith Center
- Pacific Christian Academy
- Ellenos Yogurt
- McCarthy & Causseaux Law Offices, on behalf of the Schindler Family Limited Partnership (Ellenos Yogurt building owners)
- Brad Thorson, GarageTown Federal Way Condominium Association President
- Red Canoe Credit Union
- Federal Way Custom Jewelers
- Northwest Equipment Sales and Rentals
- Race King LLC
- 1910 and 1934 South 344th Street

Community Groups:

- Federal Way Chamber of Commerce
- Protect Federal Way



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Seattle, Washington 98104
206.292.1994
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April 19, 2021

VIA EMAIL & U.S. MAIL

Email: OMFSouth@soundtransit.org

Mail: Hussein Rehmat
OMF South Project
Sound Transit
401 S. Jackson Street
Seattle WA, 98104

Re: Sound Transit OMF South Project: Draft Environmental Impact Statement (DEIS) –
Comments From Christian Faith Center (CFC)

Dear Mr. Rehmat:

On behalf of our client Christian Faith Center (CFC), we submit these comments for review in the EIS process. As you know, the CFC Campus is identified in two of the three alternatives for the South OMF Project. The South 336th Street Alternative would take all of the CFC Campus. The South 344th Street Alternative would take approximately half of the CFC Campus. Our primary comments on the DEIS at this time are:

1. CFC would prefer to not be any alternative for the OMF South Project. Any comments below are for the sole purpose of informing Sound Transit of the consequences and impacts to CFC from the two alternatives noted above and are not an express or implied consent to any selection of CFC as the preferred site for the OMF South Project.
2. The DEIS has not adequately understood and analyzed the CFC Campus, which has led to a flawed analysis of, in particular, the South 344th Street Alternative. More on this comment follows below.

Background.

CFC's story begins in 1980 with the formation of CFC to pursue its mission of spreading the word of Jesus. CFC had a vision of a future campus for its ministry with a place of convening for worship, a school, a day care facility, a college, and associated facilities. That vision became reality in the early 2000's with the acquisition of its campus property and associated land use approvals, specifically the Concomitant & Development Agreement & Development Plan (City of Federal Way, Ordinance 04-461, July 20, 2004). A copy of this 107 document is attached hereto and shall be referred to as the Campus Approval.¹

As is evident from the Campus Approval, the CFC Campus would develop in Phases, but the necessary development infrastructure for the entire site would be integrated and planned up front. By way of example only and not meant to be exhaustive, some of the important elements include:

- Planned recreational areas. Campus Approval at Section 9.1.5.4
- Extensive traffic mitigation, including multiple points of ingress and egress. Campus Approval at Section 9.4.
- Surface mitigation/storm water detention facilities. Campus Approval at Section 9.6.
- Wetland Mitigation. Campus Approval at Section 9.7.

Impacts to CFC.

Ever since CFC's Campus has been identified as a potential site for the OMF South Project, CFC has essentially been "stuck" in place and time. CFC has halted the planning and implementation of additional projects. CFC cannot grow and expand its ministry. This is true for both the South 336th Street Alternative and the South 344th Street Alternative.

CFC's selection as a site for the South OMF facility has created uncertainty and anxiety for tis members. Is their spiritual "home" going to be taken from them? Where will they go?

If the South 336th Street Alternative becomes the final site, then CFC will be forced to lose its Campus as a whole under eminent domain or the treat of eminent domain and find a new campus location and start a new multi-year development process anew. This is no easy task.

If the South 344th Street Alternative becomes the final site, CFC's situation becomes even worse. The DEIS simply and incorrectly assumes that the current site could be severed or bifurcated and somehow CFC could continue to operate on the remainder parcel.

¹ A copy of the enclosure is available at <https://docs.cityoffederalway.com/WebLink/DocView.aspx?id=192244&page=1&dbid=0&repo=CityofFederalWay>

Because the Campus Approval is an integrated plan for the entire CFC Property, taking a significant portion for the South 344th Street Alternative disrupts the entire plan and creates a situation where CFC would be in violation of its approvals. Again, by way of example only and not to be exhaustive, taking the eastern portion of the CFC Campus for the South 344th Street Alternative Project means:

- The remainder parcel no longer has a required storm water facility for its surface water management.
- CFC's required access points no longer exist, because the DEIS assumes, incorrectly, that CFC uses only one access point. It is required to have multiple.
- CFC's required recreational areas disappear.

Beyond, the physical, land use, and environmental impacts are fiscal impacts. CFC has long term financing for its current Campus. Taking a significant portion of the property would impair the lender's collateral. Its loan would be called. With the remainder of the property now a non-conforming and non-compliant property, no lender would extend credit. The City of Federal Way could commence code enforcement action requiring CFC to come into compliance with storm water, access, and recreational facilities requirements, which CFC could not meet.

CFC respectfully requests that Sound Transit carefully review the 107 page Campus Approval document to refine its analysis of impacts associated with the South 344th Street Alternative.

Thank you for considering these comments. CFC reserves the right to provide supplemental comments (whether within or external to the EIS process) as appropriate.

Very truly yours,

JAMESON PEPPLER CANTU PLLC



By: Brian Lawler
Of Counsel

Enclosure

cc: P. Rogoff, CEO, Sound Transit (By mail)
S. Ramachandra, OMF South Project Staff (By email only
sagar.ramachandra@soundtransit.org)
James Ferrell, Mayor, City of Federal Way (By email only
Jim.Ferrell@cityoffederalway.com)

ORDINANCE NO. 04-461

AN ORDINANCE OF THE CITY COUNCIL OF THE CITY OF FEDERAL WAY, WASHINGTON, RELATING TO LAND USE, ADOPTING AMENDMENTS TO THE CITY'S GROWTH MANAGEMENT ACT COMPREHENSIVE PLAN AND ADOPTING AMENDMENTS TO THE CITY'S ZONING MAP, CHANGING THE COMPREHENSIVE PLAN DESIGNATION AND ZONING FOR 49.97 ACRES LOCATED SOUTH OF S. 336TH STREET BETWEEN PACIFIC HIGHWAY SOUTH AND INTERSTATE 5 FROM BUSINESS PARK (BP) TO MULTIFAMILY RESIDENTIAL 3600 (RM 3600), AND ADOPTING AN ASSOCIATED CONCOMITANT AND DEVELOPMENT AGREEMENT AND DEVELOPMENT PLAN.

WHEREAS, the Growth Management Act of 1990, as amended, (Chapter 36.70A RCW or "GMA") requires the City of Federal Way to adopt a comprehensive plan which includes a land use element (including a land use map), housing element, capital facilities plan element, utilities element, and transportation element (including transportation system map[s]); and

WHEREAS, the GMA also requires the City of Federal Way to adopt development regulations implementing its comprehensive plan; and

WHEREAS, the Federal Way City Council adopted its comprehensive plan with land use map (the "Plan") on November 21, 1995, and adopted development regulations and a zoning map implementing the Plan on July 2, 1996; and subsequently amended the comprehensive plan, land use map, and zoning map on December 23, 1998, September 14, 2000, and November 1, 2001; and March 27, 2003; and

WHEREAS, under RCW 36.70A.130, by December, 2004, all jurisdictions within Washington State must take action to review and, if needed, revise its comprehensive plan and development regulations to ensure that they comply with the GMA; and

WHEREAS, the City may consider Plan and development regulation amendments pursuant to Article IX, Chapter 22 of the *Federal Way City Code* (FWCC); and

WHEREAS, under RCW 36.70A.130, the Plan and development regulations are subject to continuing review and evaluation, but the Plan may be amended no more than one time per year; and

WHEREAS, the Council shall be considering three separate actions to amend the Plan, all of which will be acted upon simultaneously in order to comply with RCW 36.70A.130; and

WHEREAS, these actions include adoption of a Potential Annexation Area (PAA) Subarea Plan, which will replace Chapter 8, Potential Annexation Areas of the Federal Way Comprehensive Plan and address certain comprehensive plan text changes pertaining to the Community Business (BC) comprehensive plan designation and zoning; and

WHEREAS, these actions include deletion of the planned extension of Weyerhaeuser Way South, north of South 320th Street, shown on Map III-27B from the Comprehensive Plan and deletion of this project from Table III-19 (Regional CIP Project List); and

WHEREAS, these actions include a change in comprehensive plan designation and zoning from Business Park (BP) to Multifamily Residential 3600 (RM 3600) through adoption of an associated concomitant and development agreement and development plan for 49.97 acres located south of S. 336th Street between Pacific Highway South and Interstate 5, referred to herein as the Christian Faith Center Property; and

WHEREAS, in 2000, the City of Federal Way accepted requests for amendments to the text and maps of the comprehensive plan and applications for site-specific changes to the Plan's land use map and the City's zoning map, and considered amendments to the text and maps of the comprehensive plan and to the Plan's land use map and the City's zoning map, including a request to change the Christian Faith Center Property from Business Park (BP) to Multifamily Residential 3600 (RM 3600); and

WHEREAS, on July 4, 2001, the City SEPA Responsible Official issued a Determination of Nonsignificance on the proposed Plan and zoning map amendment; and

WHEREAS, Pursuant to FWCC Section 22-1660, development agreements associated with a comprehensive plan designation and related zoning change may be used at the City Council's discretion, where

the project is larger in scope and has potentially larger impacts than normal, or where the City Council may desire to place certain restrictions on the proposal; and

WHEREAS, A Concomitant Agreement and Development Agreement has been prepared for the proposed project on the Christian Faith Center Property (the "Project") in order to fully address and mitigate all identified impacts associated with the project, and the Concomitant Agreement allows for a rezone of the property but limits the allowable use of the property to a church, a school, and accessory uses, and the Agreement is accompanied by a Development Plan (*Exhibit B* to the Agreement) as required by FWCC Section 22-1669, and prepared in accordance with FWCC Section 22-1664; and

WHEREAS, Pursuant to the State Environmental Policy Act (SEPA), the City issued Draft and Final Environmental Impact Statements (EIS) for the Project on November 18, 2003, and March 3, 2004, and EIS Addenda on April 16, 2004 and May 21, 2004, and four public meetings were conducted during the environmental review process for the proposed Project which included an EIS Scoping Meeting on August 27, 2002, Neighborhood Traffic Meeting on May 8, 2003, Draft Environmental Impact Statement (DEIS) hearing on December 12, 2003, and City Council EIS briefing on March 15, 2004; and

WHEREAS, the proposed Plan and zoning map changes address all of the goals and requirements set forth in the GMA; and

WHEREAS, the proposed Concomitant and Development Agreement and Development Plan address all of the goals and requirements set forth in the FWCC; and

WHEREAS, the City of Federal Way, through its staff, Planning Commission, City Council committees, and full City Council has received, discussed, and considered the testimony, written comments, and material from the public, as follows:

1. The City's Planning Commission considered the request for amendment to the comprehensive plan at public hearings held on July 18, 2001, August 15, 2001, and September 19, 2001, following which it forwarded a recommendation to the City Council; and

2. The Land Use and Transportation Committee of the Federal Way City Council considered the proposed site-specific changes to the Plan's land use map and the City's zoning map on October 1, 2001 at which time it requested a development agreement and development plan be prepared for the Project; and

3. The full City Council considered the proposed change to the Plan's land use map and the City's zoning map and the associated Concomitant and Development Agreement and Development Plan on May 24, 2004, and June 15, 2004; and

WHEREAS, the City Council desires to adopt the changes to the Plan's land use map and City's zoning map and associated Concomitant and Development Agreement and Development Plan;

NOW, THEREFORE, the City Council of the City of Federal Way, Washington, does hereby ordain as follows:

Section 1. Findings and Conclusions.

A. The proposed amendment to the comprehensive plan land use map, as set forth in Exhibit A hereto, reflects new or updated information developed since the initial adoption of the comprehensive plan. It bears a substantial relationship to public health, safety, and welfare; is in the best interest of the residents of the City; and is consistent with the requirements of RCW 36.70A, the King County Countywide Planning Policies, and the unamended portion of the Plan. The amendment, as mitigated, is compatible with adjacent land uses and surrounding neighborhoods and will not negatively affect open space, streams, lakes or wetlands, or the physical environment in general. It will allow for growth and development consistent with the Plan's overall vision and with the Plan's land use element household and job projections, and/or will allow reasonable use of property subject to constraints necessary to protect environmentally sensitive areas. It therefore bears a substantial relationship to public health, safety, and welfare; is in the best interest of the residents of the City; and is consistent with the requirements of RCW 36.70A, the King County Countywide Planning Policies, and the unamended portion of the Plan.

B. The proposed amendment to the Zoning Map, set forth in Exhibit B, attached hereto, adopted pursuant to the concomitant agreement, is consistent with the applicable provisions of the comprehensive plan and the comprehensive plan land use map proposed to be amended in Section 2 below, bears a substantial relation to public health, safety, and welfare, and is in the best interest of the residents of the City.

C. The Concomitant and Development Agreement and Development Plan, as set forth in Exhibit C, attached hereto, is consistent with RCW 36.70B, RCW 43.21C, and FWCC Chapter 22, Article XXI.

D. Additional Findings and Conclusions are attached as Exhibit D and incorporated herein by this reference as if set forth in full.

Section 2. Comprehensive Plan Amendments Adoption. The 1995 City of Federal Way comprehensive plan, as thereafter amended in 1998, 2000, 2001, and 2003, including its land use element map, copies of which are on file with the Office of the City Clerk, hereby are and shall be amended as set forth in Exhibit A attached hereto and is hereby incorporated by this reference as if set forth in full.

Section 3. Zoning Map Amendments Adoption. The 1996 City of Federal Way Official Zoning Map, as thereafter amended in 1998, 2000, 2001, and 2003 is hereby amended as set forth in Exhibit B, pursuant to the Concomitant and Development Agreement, and is hereby incorporated by this reference as if set forth in full.

Section 4. Concomitant and Development Agreement and Development Plan Adoption. The Concomitant and Development Agreement and Development Plan, attached as Exhibit C, is hereby adopted and incorporated herein by this reference as if set forth in full.

Section 5. Amendment Authority. The adoption of Plan amendments is pursuant to the authority granted by Chapters 36.70A and 35A.63 RCW, and pursuant to FWCC Section 22-541. The adoption of the Concomitant and Development Agreement and Development Plan is pursuant to the authority granted by Chapter 36.70B RCW and pursuant to FWCC Chapter 22, Article XXI.

Section 6. Severability. The provisions of this ordinance are declared separate and severable. The invalidity of any clause, sentence, paragraph, subdivision, section, or portion of this ordinance, or the invalidity of the application thereof to any person or circumstance, shall not affect the validity of the remainder of the ordinance, or the validity of its application to other persons or circumstances.

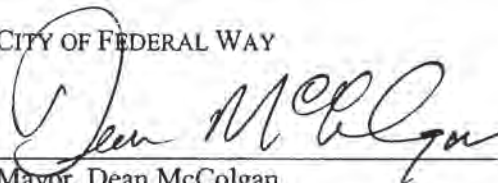
Section 7. Savings Clause. The 1995 City of Federal Way Comprehensive Plan, and 1996 Zoning Map, as thereafter amended in 1998, 2000, 2001, and 2003 shall remain in full force and effect until the amendments thereto become operative upon the effective date of this ordinance.

Section 8. Ratification. Any act consistent with the authority and prior to the effective date of this ordinance is hereby ratified and affirmed.

Section 9. Effective Date. This ordinance shall take effect and be in force five (5) days from and after its passage, approval, and publication, as provided by law.


PASSED by the City Council of the City of Federal Way this 20th day of July, 2004.

CITY OF FEDERAL WAY



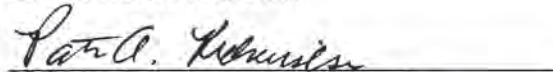
Mayor, Dean McColgan

ATTEST



City Clerk, N. Christine Green, CMC

APPROVED AS TO FORM:



City Attorney, Patricia A. Richardson

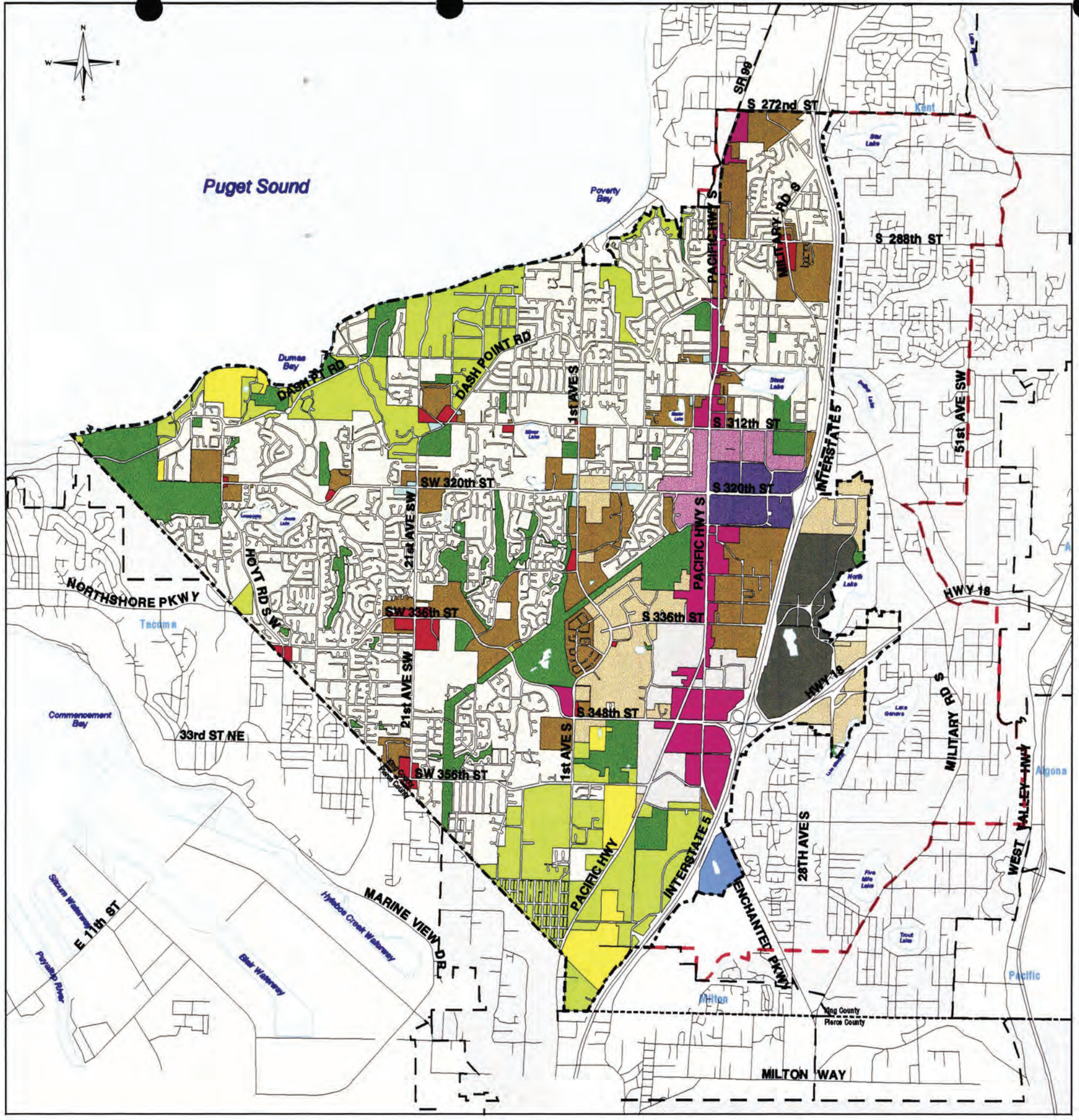
FILED WITH THE CITY CLERK: 06/28/04
PASSED BY THE CITY COUNCIL: 07/20/04
PUBLISHED: 07/24/04
EFFECTIVE DATE: 07/29/04
ORDINANCE NO: 04-461

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COMPREHENSIVE PLAN DESIGNATIONS



- Federal Way City Limits
- Potential Annexation Area
- City Center Core
- City Center Frame
- Corporate Park
- Office Park
- Professional Office
- Commercial/Recreation
- Business Park
- Neighborhood Business
- Community Business
- Parks and Open Space
- Multi-Family
- Single Family-High Density
- Single Family-Medium Density
- Single Family-Low Density

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EXHIBIT C

CONCOMITANT AND DEVELOPMENT AGREEMENT AND DEVELOPMENT PLAN

**CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT**

**BETWEEN THE CITY OF FEDERAL WAY AND THE CHRISTIAN FAITH CENTER FOR
DEVELOPMENT OF CHURCH AND PRIVATE SCHOOL**

JULY 20, 2004

The City of Federal Way ("City") and the Christian Faith Center ("CFC"), a Washington nonprofit corporation, collectively referred to herein as "the Parties", enter into the following concomitant agreement and development agreement ("Agreement") regarding the rezoning of certain property and the scope of permissible development, use, and mitigation of environmental impacts associated with the campus development of a church and private school ("Project"), through construction of the buildings and related improvements on the CFC property.

The agreement is both a concomitant agreement and a development agreement. The concomitant agreement allows for a rezone of certain property subject to development standards and conditions governing the use of the property. The development agreement provides the developer with certainty regarding the local regulations and mitigation requirements that will govern development for a specified project. The concomitant agreement is a condition to and limitation upon the rezone of the property, if adopted by the City Council. That is, if the site is rezoned subject to concomitant agreement, its use and development is restricted both by the regulations applicable to the new zoning classification and the provisions of the concomitant agreement, and where development standards in the agreement are more restrictive, they govern property development. The development of the property is conditioned and limited by both the development agreement and concomitant agreement, and they have been combined into one document.

1. **Location.** CFC is the owner of certain real property situated in Federal Way, Washington, located south of South 336th Street between SR-99 and Interstate 5 (the "Property"). The Property is more particularly described on Exhibit A attached hereto and incorporated herein by this reference.
2. **Project Description.** The Project consists of development of a 218,500 square foot building for church sanctuary/school auditorium/administrative services a 101,526 square foot private school building, and associated parking and recreational and athletic fields as depicted on the Development Plan, attached hereto as Exhibit B and incorporated herein by this reference (the "Plan" or "Development Plan").
3. **Concomitant Agreement.** If the Property is rezoned from Business Park (BP) to RM 3600 by the Federal Way City Council, CFC and the City agree that the Property may be developed only in accordance with the standards and mitigation set forth in the Agreement. The Property shall be developed as described in the Agreement, and as depicted in the Development Plan. The allowable use of the property shall be limited to that described in the Agreement. All development standards, including mitigation, identified in the Agreement shall apply to Property development. No development on the Property shall be inconsistent with the Agreement or City Code. The Property is subject to the Agreement, and shall be developed only in accordance with the development standards identified within the Agreement, including the Development Plan (except for minor modifications permitted by Section 10 of the Agreement), unless and until the Agreement is amended or rescinded, as authorized by the City.

4. Development Agreement. The Agreement is authorized by RCW 36.70B.170 through .210 and FWCC 22-1660 through 22-1680. It addresses Project development standards, which are defined in the statute to include, for example, impact fees, mitigation, design standards, phasing issues, review procedures, vesting issues, and any other appropriate development requirements.¹ The Agreement provides the City and CFC with certainty as to the type of Project that will be built, the type of mitigation that will be provided, and the development regulations to which the Project will vest.

The Project is consistent with current local regulatory requirements.² As authorized by state statute,³ the Agreement identifies mitigation under City codes and the State Environmental Policy Act (Chapter 43.21C RCW, "SEPA") required for the project.

5. Vesting. City development regulations, as found in the Federal Way City Code (FWCC) or otherwise legislatively adopted⁴, and the mitigation measures adopted herein shall govern the Project for a period of five years, dating from execution of the Agreement. Any amendments or additions made to City development regulations during the five year period shall not apply to or affect the development, except as otherwise provided, or if other county, state or federal laws preempt the City's authority to vest regulations. The City reserves the authority to impose new or different officially adopted regulations to the extent required by a serious threat to the public health and safety.⁵ After the five-year period, amendments or additions made by the City to these development regulations and the mitigation measures adopted herein shall apply to any subsequent or further development of the Property. Otherwise, the Property and the uses thereof that are developed consistent with this Agreement shall be deemed legal, nonconforming uses. Provisions of the Agreement, including specifically identified development standards and mitigation measures, do not terminate after the five-year period and continue to restrict development of the Property unless and until amended by the City.

6. Project Mitigation Under SEPA. The Project has been subject to detailed environmental review. A Final Environmental Impact Statement ("FEIS") was issued on March 3, 2004 and addenda were issued April 16, 2004 and May 21, 2004. Mitigation of significant adverse environmental impacts imposed under SEPA, through the City's SEPA regulations, is incorporated into the Agreement.

7. Development of CFC Property.

7.1 Permitted Uses. CFC covenants and agrees that it will limit any use of the Property to the church and school uses, as depicted in the Development Plan, attached as Exhibit B. Both the church and school are classified as principal uses for application of FWCC Sections 22-671 and 22-674. Accessory uses shall be limited to those approved as a part of this Agreement and shown on the attached Plan or List of Permitted Accessory Uses, attached as Exhibit C, or any accessory use determined by the Director of Community Development Services to be allowed, or analogous to an allowed accessory use, in the RM 3600 zone.

7.2 Relationship Between City Development Regulations and Development Standards Identified in Agreement. Development Regulations include all provisions of the Federal Way City Code (FWCC), including without limitation FWCC Chapters 18 through 22. The Development Regulations for the Property include those applicable to the RM 3600 zone and as

¹ RCW 36.70B.170(3).

² RCW 36.70B.170(1).

³ RCW 36.70B.170(3)(c).

⁴ Legal requirements include legislatively adopted standards governing development, such as zoning, building and development regulations, impact fees, SEPA regulations and substantive SEPA policies, and other laws, ordinances or policies.

⁵ See RCW 36.70B.170(4).

set forth in the Agreement. The Agreement establishes site specific development standards, including mitigation. Property development shall be consistent with both development regulations and the development standards identified in the Agreement. Where the development standards in the Agreement are more restrictive, they shall govern development of the Property, as specified herein.

7.3 Construction Phasing. Project construction shall be limited to two phases. Phase One shall comprise construction of the building for the church sanctuary, auditorium, meeting rooms and administrative offices, and the first 81,323 square feet of the school building, together with all on-site and off-site improvements required by this Agreement and by the conditions of any related permit approval. Phase Two shall comprise construction of a future second-story 20,203 square foot addition to the school building. Each phase, with the exception of improvements completely within the interior of a building, must be substantially completed within twenty-four (24) months of issuance of the building permit for that phase, except for delays beyond the control of CFC and approved by the Director of Community Development Services which approval shall not be unreasonably withheld. Project construction shall be completed within five years of the execution of this Agreement, except for delays beyond the control of CFC and approved by the Director of Community Development Services which approval shall not be unreasonably withheld.

8. **Settlement Agreement.** The Parties shall be bound by the Settlement Agreement between the City of Federal Way and Federal Way Industrial Park, Inc., dated February 5, 1996, attached hereto as Exhibit D and incorporated herein by this reference. The Settlement Agreement provides certain development standards and other provisions applicable to use and development of the Property, which are consistent with the terms of this Agreement. The terms of this Agreement shall control over any inconsistent terms in the Settlement Agreement.

9. **Development Standards, Including Mitigation.** The Project shall be consistent with all specified development standards. CFC shall construct, install or implement, as part of Project Construction, all mitigation required by the Agreement. The City Council has reviewed the EIS and the record. Mitigation has been developed based on these documents.

9.1 Project Design and Site Configuration.

9.1.1 Building Setback. All site improvements shall be setback from South 336th Street a minimum of 50 feet. The property bordering South 336th Street shall be deemed the front yard for purposes of this Agreement. Remaining rear and side setbacks for the church building shall be 30 feet from any property line or right-of-way. Remaining side and rear setbacks for the school building, ball fields, and any playground equipment shall be 50 feet from any property line or right-of-way.

9.1.2 Building Height. The maximum allowed height of single-story elements of the church building is 35 feet above average building elevation (ABE), with up to three additional feet allowed for articulated cornices; the maximum allowed height for second-story elements containing offices, classrooms, library and similar uses is 40 feet above ABE. The maximum height of the school building is 40 feet above ABE with up to three additional feet allowed for articulated cornices. The maximum allowed height for the church sanctuary/school auditorium portion of the building and the gymnasium is 55 feet above ABE.

9.1.3 Landscaping. CFC shall provide an approved landscape plan, prior to issuance of the Phase One building permit, incorporating the following features. The landscape plan shall be prepared by a landscape architect in consultation with a habitat biologist, whose recommendations shall be incorporated into the plan.

9.1.3.1 Perimeter Landscaping. CFC shall provide a combination of existing and new native landscaping to accomplish Type III landscaping along all property lines and public rights-of-way and access easements. Along South 336th Street, landscaping shall be 50 feet in width consisting of 25 feet of a combination of Existing Native and Type III landscaping and 25 feet of Type IV landscaping. Along all other property lines associated with that portion of the Property containing the church, landscaping shall be 15 feet in width consisting of 10 feet of a combination of Existing Native and Type III landscaping and 5 feet of Type IV landscaping. Wetlands and wetland buffers which are vegetated in accordance with a City approved wetland mitigation plan and landscape plan and which are in excess of fifty (50) feet between the development and the property line shall be deemed to have satisfied the landscaping requirements of that property line.

9.1.3.2 Detention Pond Landscaping. Landscaping around detention ponds shall comply with the approved landscape plan and include at a minimum provision for dense bank cover and trees larger than the minimum required by FWCC to provide shade and reduce water temperature. For purposes of this Agreement, the term "larger" means deciduous trees larger than 3 inch caliper and evergreen trees taller than eight feet.

9.1.3.3 Habitat Retention. CFC shall provide a fifty (50) foot wide wildlife corridor from the west wetland to the east wetland with small animal culvert crossings under proposed roads and water ponding areas along the wildlife corridor, at a spacing of approximately 200 feet, to provide drinking areas for small animals.

9.1.4 Parking.

9.1.4.1 Setback. Parking shall be permitted within the required side and rear yards, but not within 10 feet of any property line associated with the school or within 15 feet of any property line associated with the church or within any required buffer.

9.1.4.2 Number of Stalls. CFC shall provide a minimum of 1,406 parking stalls and a maximum of 1,540 parking stalls.

9.1.4.3 Parking Dimensions. Maximum parking lot and stall dimensional requirements shall be equivalent to corresponding minimum FWCC requirements except as modified by the attached Exhibit E.

9.1.4.4 Overflow Parking/Special Events. Overflow parking shall be permitted only pursuant to a parking plan approved by the Director of Public Works. CFC

shall develop and submit a plan for approval by the Director of Public Works prior to special events to manage overflow parking through an arrangement with an appropriate transit provider or local hosts for shared use of additional off-site parking spaces and shuttle transportation connecting the overflow parking areas and the site during special events or in the event of recurring overflow parking conditions. CFC shall be responsible for all costs associated with traffic control including, but not limited to, flaggers, police officers, signs, and shuttle transportation.

9.1.5 Size Limitation.

9.1.5.1 School. The school structure shall be limited to 101,526 square feet, including 81,323 square feet in Phase One and 20,203 square feet in Phase Two, as depicted in the attached Conceptual Floor Plan, Exhibit F. The day care shall be located in the main church/sanctuary/administration building and shall be limited to 33,000 square feet. Based on these maximum square footages, total enrollment of the school and daycare shall be limited to a maximum of 900 full-time students.

9.1.5.2 Sanctuary. Sanctuary occupancy shall conform to all applicable local, state and federal laws and regulations and shall not exceed 4,500 occupants.

9.1.5.3 College. The Dominion College shall be considered an accessory use to the church and as such shall primarily serve CFC students and staff and members of the CFC congregation. The Dominion College shall be limited to 23,000 square feet as depicted in the attached Conceptual Floor Plan, Exhibit F. Based on this square footage, enrollment shall be limited to a maximum of 225 students.

9.1.5.4 Recreation Areas. Exterior recreation and play areas shall be provided in a minimum amount of 27,026 square feet in the school yard, a minimum 100,000 square feet in the recreation/sports field, and 4,613 square feet in the church day care area. Such minimum areas shall be permanently maintained as recreation and play areas.

9.2 Operational Limitations. CFC operations shall be consistent with the schedule and restrictions listed below. Changes in the below schedule, which was provided by the applicant, shall be reviewed under FWCC 22-1680 to ensure that the project remains consistent with the review completed under SEPA and the FWCC. Minor modifications may be approved by the Director of Community Development Services, as specified in FWCC 22-1680.

9.2.1 Church Service Hours. Church services shall be limited to one weekday evening service (typically on Wednesdays) which shall not begin before 6:30 p.m. and Sunday church services shall be separated by at least one and one-half hours between services.

9.2.2 Dominion College Hours. Dominion College classes shall not be held on weekends or between the hours of noon and 6:30 p.m. weekdays.

9.2.3 Bible Study Hours. Bible Study classes shall be held only weekdays before noon.

9.2.4 School Hours. School classes shall be completed no later than 3:30 p.m. daily.

9.2.5 Holiday Services/Special Events. Holiday services and special events shall be scheduled consistent with the approved Traffic Management Plan (TMP) required by 9.4.12 and consistent with 9.1.4.4.

9.3 Construction Mitigation.

9.3.1 Erosion Sediment Control. CFC shall designate and provide an onsite Erosion Sediment Control (ESC) Supervisor approved by the Director of Public Works, who possesses a Construction Site Erosion and Sediment Control Certification by the Washington State Department of Transportation (WSDOT). This ESC Supervisor shall be available for the duration of the project. The qualifications and responsibilities of the ESC Supervisor are outlined in the 1998 King County Surface Water Design Manual (KCSWDM) and City of Federal Way Addendum. The Director of Public Works may further limit clearing and grading activities on the site based on recommendations from the ESC Supervisor and requirements of the KCSWDM.

9.3.2 Stormwater Pollution Prevention Plan. A construction Stormwater Pollution Prevention Plan (SWPPP) shall be provided by CFC and reviewed and approved by the Director of Public Works prior to issuance of any construction permits or authorizations. Construction phasing shall be included in this plan. CFC has proposed several BMP's which shall be captured in the SWPP plan including, but not limited to, confining refueling and equipment maintenance to a hard-surface staging area with spill containment features and a spill clean-up kit, and pipe slope drains used to convey storm water over steep slopes.

9.3.3 Clearing and Grading. Clearing and grading shall be allowed only pursuant to a phased construction plan approved by the Director of Public Works. Clearing and grading shall occur only between May 1 and September 30 unless otherwise approved by the Director of Public Works.

9.4 Traffic Mitigation. CFC shall perform, as part of Project construction and prior to issuance of certificate of occupancy unless otherwise noted, the following traffic mitigation as required and approved by the Director of Public Works.

9.4.1 CFC shall reconstruct 18th Avenue South from the existing berm to S 344th Street to a modified street section, consisting of 24 foot wide street with vertical curb and gutter, 5-foot sidewalks, and two additional street lights mounted on existing power poles, consistent with the attached Exhibit G-1. Traffic calming elements shall be installed, including 2 speed humps, 1 crosswalk, bulb outs at the intersection of 18th Avenue South and S 341st Street and 18th Avenue South and S 344th Street to narrow the throat width of 18th Avenue South to 20 feet, and street signage shall be installed to address no through truck traffic, children playing, speed humps, crosswalk and speed limit.

9.4.2 CFC shall improve S 344th Street from 16th Avenue S to 18th Avenue S consistent with the attached Exhibit G-2. Construction shall consist of Type R Street. The north side shall consist of a 40 foot wide street with curb and gutters, 4 foot planter strip with

street trees, 6 foot sidewalk, and street lights. The improvements shall be tied into the existing improvements to the west end of S 344th Street to the east side of the intersection of S 344th Street and 16th Avenue S. On the south side, only curb and gutter shall be required. CFC shall construct improvements within existing right-of-way.

9.4.3 CFC shall improve S 344th Street through the intersection of 16th Avenue S and shall signalize the intersection of S 344th/16th Ave S consistent with the attached Exhibit G-3. CFC shall construct improvements within existing right-of-way.

9.4.4 CFC shall construct street improvements consistent with the attached Exhibit G-4 to signalize the intersection of SR 99 and S 344th Street and provide a westbound-to-southbound left-turn lane within existing right-of-way. If delays beyond the control of CFC and the City prevent the completion of these improvements by the time of issuance of certificate of occupancy, CFC may obtain a certificate of occupancy subject to the Public Works Director requiring temporary traffic control measures for up to one hour following the end of each Sunday service until such time that the traffic signal is operational.

9.4.5 CFC shall perform a sight distance study, propose a conceptual intersection plan for the intersection of 20th Avenue S at S 341st Street to be approved by the Director of Public Works, and construct improvements as determined by the Director of Public Works.

9.4.6 CFC shall construct street improvements along S 336th Street consistent with the attached Exhibits G-5 and G-6. The improvements shall be consistent with Type M street between SR 99 and 20th Avenue S, consisting of an 18-foot half-street with curbs and gutter, 6-foot planter strip with street trees, 8-foot sidewalk, street lights, underground utilities, and 3-foot utility strip. Improvements will be consistent with Type K street between 20th Avenue S and I-5, consisting of a 22-foot half-street with curb and gutter, 6-foot planter strip with street trees, 8 foot sidewalk, street lights, underground utilities, and 3-foot utility strip. A continuous two-way left-turn lane shall be provided between SR 99 and Forest Lane Town Homes frontage. Curbs and gutter, planter strip, and sidewalk shall also be provided on the north side between South Garden Court condominiums and Forest Lane Town Homes to tie into the existing improvements. An eastbound right-turn lane shall be provided on S 336th Street at 20th Avenue S, consisting of a 100-foot storage length and 50-foot taper length. These improvements may be modified by the Director of Public Works to minimize impacts to wetlands or minimize right-of-way acquisition.

9.4.7 CFC shall improve 20th Avenue S for a distance of 225 feet (175 feet of storage and 50 foot taper) to the North of the intersection of S 336th Street and signalize the intersection consistent with the attached Exhibit G-7.

9.4.8 CFC shall construct an eastbound right turn lane from S. 336th Street to 20th Avenue S.

9.4.9 CFC shall construct traffic calming elements on 20th Avenue S from S 336th Street to S 330th Street, including traffic circles at S 330th Street and S 332nd Street and an island diverter at S 336th Street to prevent northbound and southbound through movements, and construct a sidewalk on the east side of 20th Avenue S from S 336th

Street to tie in to the existing sidewalk, consistent with the attached Exhibits G-7 and G-8. CFC shall construct improvements within existing right-of-way.

9.4.10 CFC shall provide two transit shelters, shelter footings, litter receptacle pads, landing pads and benches, one located on 20th Avenue S in the existing location north of S 336th Street and one located on S 336th Street as determined by City staff with input from King County Metro and Pierce Transit.

9.4.11 Upon a one time request of the Director of Public Works, CFC shall develop and implement Sunday peak hour timing plans, based on turning movement counts for signal timing plans collected by CFC for the intersections of 20th Avenue S and S 336th Street, SR 99 and S 324th Street, SR 99 and S 330th Street, SR 99 and S 336th Street, SR 99 and S 340th Street, 16th Avenue S and S 344th Street, and SR 161 and S 348th Street.

9.4.12 CFC shall implement a Traffic Management Plan (TMP) for the Project as approved by the Director of Public Works.

9.4.13 CFC shall pay to the City Three Hundred Fifty Thousand and No/100 Dollars (\$350,000.00) to expand the City's existing project at the intersection of S 348th Street and SR 161 to provide for the construction of a second northbound right-turn lane with 550 feet of storage. Payment shall be made one year after receipt of the Certificate of Occupancy for Phase One of the Project or upon award of the bid to construct the turn lane whichever shall occur first.

9.4.14 CFC shall pay to King County its pro rata share contribution to the King County Transportation Improvement Plan (TIP) project at South 320th Street and Military Road in the amount of Six Hundred Forty-Seven and No/100 Dollars (\$647.00).

Except as provided above, CFC shall use its best efforts to acquire any and all right-of-way necessary to complete the improvements described in this Agreement. If, through no fault of CFC, CFC is unable to acquire right-of-way necessary to complete the improvements described, the City and CFC agree to meet and confer on possible alternatives. The Director of Public Works may modify the required improvements as necessary provided impacts are mitigated.

9.5 Payment of Pro Rata Share. CFC shall pay, prior to issuance of the certificate of occupancy for Phase One of its construction as defined in this Agreement, its pro rata share contribution to impacted City Transportation Improvement Plan (TIP) projects, identified and calculated below:

- S 348th Street: 9th Ave S – SR 99: \$60,500
- S 356th St: 1st Ave S – SR 99: \$50,200
- S 348th St @ 1st Ave S: \$13,100
- S 336th St @ 1st Way S: \$3000
- 12th Ave SW / SW 344th St Extension: SW Campus Dr – 21st Ave SW: \$38,700
- 1st Ave S: S 320th St – S 330th St: \$7600
- 21st Ave SW Extension: SW 356th St – 22nd Ave SW: \$2800
- SR 18 @ SR 161: \$24,800
- S 336th St @ 9th Ave S: \$1100

- o S 320th St @ I-5: \$34,100

Total \$235,900

9.6 Surface Water Mitigation. The following storm water mitigation, as required and approved by the Director of Public Works, shall be designed by CFC prior to issuance of construction permits or authorizations and constructed by CFC prior to issuance of certificate of occupancy.

9.6.1 CFC shall design and construct the east basin storm water detention pond to meet Level 2 flow control standards.

9.6.2 Consistent with the Process IV Hearing Examiner Decision, CFC shall design and construct all runoff from the Sanctuary roof for the 2 year storm event to be collected and dispersed through percolation trenches to maintain wetland hydrology in the westerly wetland.

9.6.3 CFC shall design and construct all surface water treatment facilities from the East and West 1 subcatchments to include the use of Stormwater Management® filter vault systems which meet or exceed Resource Stream Protection standards.

9.6.4 CFC shall design and construct storm water discharge facilities entering into wetlands or buffers as percolation or infiltration trenches and discharges to wetland buffers in a dispersed manner consistent with the Process IV Hearing Examiner Decision and as approved by the Director of Public Works.

9.6.5 CFC shall provide, prior to issuance of Building Permit, an Integrated Pest Management Plan as described in the Ecology Stormwater Manual (Ecology 2001). This source control BMP shall outline control of fertilizer and pesticide application, soil erosion, and site debris, and include the use of pesticides/herbicides only as a last resort.

9.7 Wetland Mitigation. CFC shall comply with all conditions contained in the Process IV Hearing Examiner Decision dated April 23, 2004 and attached hereto as Exhibit H.

10. **Other Project Review Processes and Minor Modifications.**

10.1 Other Project Review Processes. The Project will be subject to building permit review and other applicable review processes. The final design of the buildings and other improvements, precise location of building footprints, location of utilities, determination of access points, and other design issues will be determined during that process and must be consistent with the Agreement.

10.2 Modifications. Minor modifications to the Plan may be approved by the Director of Community Development Services and processed in accordance with FWCC 22-1680. Factors to be considered by the Director of Community Development Services when determining if a modification to the Plan is minor include but are not limited to the following.:

- a. Activity changes (excluding change of use of the principal use or expansion of accessory uses as specified herein) or increases in square footage of gross floor area as defined by

- FWCC section 22-1 that do not result in significant additional or modified trip generation or distribution.
- b. Changes in the location or number of access points that do not impact traffic safety or modify trip distribution.
 - c. Requests for modification of landscaping pursuant to FWCC 22-1570.
 - d. Removal of significant trees in conjunction with other actions deemed minor.
 - e. Addition of fewer than twenty parking stalls outside of areas containing "significant trees" as defined by FWCC.
 - f. Exterior changes that do not significantly add to or alter approved architectural design.
 - g. Actions that do not result in impacts to the environment pursuant to the State Environmental Policy Act requiring issuance of a mitigated threshold determination of nonsignificance.
 - h. Actions that do not require review by the hearing examiner.

A modification is not minor if the Director of Community Development Services determines that there will be substantial changes in the impacts on the neighborhood or the city as a result of the change. Modifications that are not minor modifications are major modifications and shall require City Council approval pursuant to FWCC 22-1680.

11. Waiver and Mutual Release of Claims of Invalidity. The City and CFC acknowledge and represent that the terms of this Agreement have been jointly negotiated and that each party enters into this Agreement voluntarily. Further, CFC and the City agree that this Agreement is authorized under law and each party waives any claim that the Agreement is invalid or illegal. The agreements and representations in this Section are material to this Agreement and are being relied upon by both parties.

12. General Provisions.

12.1 Binding on Successors.

12.1.1 The Agreement shall bind and inure to the benefit of the Parties and their successors in interest, and may be assigned to any successor in interest to the Project property.

12.1.2 This Agreement is intended to protect the value of, and facilitate the use and development of, the Property and to protect the public health, safety, and welfare of the City. Therefore, the covenants set forth herein shall be construed to and do touch and concern the Property and the benefits and burdens inuring to CFC and to the City from this Agreement shall run with the land and shall be binding upon CFC, its heirs, successors, and assigns, and upon the City.

12.2 **Governing Law.** This Agreement shall be governed by and interpreted in accordance with the laws of the State of Washington. Venue for any action to enforce the terms of this Agreement shall be in King County Superior Court.

12.3 **Severability.** The provisions of this Agreement are separate and severable. The invalidity of any clause, sentence, paragraph, subdivision, section, or portion or the invalidity of the application thereof to any person or circumstance, shall not affect the validity of the remainder of this Agreement, or the validity of its application to other persons or circumstances.

12.4 Authority. The City and CFC each represents and warrants to the other that it has the respective power and authority, and is duly authorized, to execute and deliver this Agreement and that the persons signing on its behalf are duly authorized to do so. CFC further represents and warrants that it is the fee owner of the Property, that it has authority to agree to the covenants and provisions contained herein, and that there are no other persons, entities, or parties with any fee interest in the Property.

12.5 Amendment. This Agreement may be modified only by written instrument authorized by the City Council and duly executed by the City Manager and CFC, and their successors and assigns consistent with FWCC 22-1679; provided, however, notwithstanding the provisions of this Agreement to the contrary, the City of Federal Way may, without the agreement of CFC, adopt and impose upon the Property restrictions and development regulations different than those set forth herein, if required by a serious threat to public health and safety. Moreover, as provided in Section 5 of the Agreement, five years after the date of the execution of the Agreement, the City may elect, without the agreement of CFC, to apply development regulations in effect at that time to any development within the scope of the Agreement that has not been completed at that time.

12.6 Exhibits. All exhibits attached hereto are incorporated herein by this reference as if fully set forth herein.

12.7 Headings. The headings in this Agreement are inserted for reference only and shall not be construed to expand, limit or otherwise modify the terms and conditions of this Agreement.

12.8 Integration; Scope of Agreement. This Agreement and its exhibits represent the entire agreement of the Parties with respect to the subject matter hereof. There are no other agreements, oral or written, except as expressly set forth herein. This Agreement does not set forth all conditions applicable to the Project to the extent that additional conditions may be imposed as part of any permit issued by the City, as required by the Federal Way City Code as determined by the discretion of the Directors of the Departments of Community Development Services and/or Public Works.

12.9 Enforcement. Subject to the notice and cure provisions of this section, in the event either party fails to satisfy any of its obligations under this Agreement, the other party shall have the right to enforce this Agreement by an action at law for damages or in equity for specific performance. The Parties acknowledge that damages are not an adequate remedy for breach by either party. In addition to the remedies set forth herein, in the event of a breach of this Agreement by CFC, the City may enforce this Agreement under the enforcement provisions of the Federal Way City Code in effect at the time of the breach and/or it may terminate this Agreement and take action to amend the Comprehensive Plan and zoning designation of the Property. No party shall be in default under this Agreement unless it has failed to perform its duties or obligations under this Agreement for a period of thirty (30) days after written notice of default from the other party. A notice of default shall specify the nature of the alleged default and the manner in which the default may be cured. If the nature of the default is such that it cannot be reasonably cured within thirty (30) days, then a party shall not be deemed in default if the party commences a cure within thirty (30) days and, thereafter, diligently pursues completion of the cure.

12.10 Attorneys Fees. In any action brought to enforce this Agreement or for damages resulting from a breach thereof, the prevailing party as determined by the court, shall be entitled to recover its reasonable attorneys' fees.

12.11 Police Power. Nothing in this Agreement shall be construed to diminish, restrict or limit the police powers of the City granted by the Washington State Constitution or by general law. This Agreement is an exercise of the City's police powers, the authority granted under RCW 36.70B.170-.210, and other laws.

12.12 Recording; Assignment. The Agreement shall be recorded with the Real Property Records Division of the King County Records and Elections Department.

12.13 No Third Parties. The Agreement is made and entered into for the benefit of the parties hereto and their successors and assigns. No other person or entity is an intended third party beneficiary. No other person or entity shall have any right of action under this Agreement.

IN WITNESS WHEREOF the parties have hereunto placed their hand and seals on the day and year indicated.

CITY OF FEDERAL WAY,
a Washington municipal corporation

CHRISTIAN FAITH CENTER,
a Washington nonprofit corporation

BY: _____
David H. Moseley, City Manager

BY: _____
Casey Treat, President

Date: _____

Date: _____

ATTEST: This ____ day of _____, 2004.

N. Christine Green, CMC
Federal Way City Clerk

Approved as to Form
for City of Federal Way:

Approved as to Form
for Christian Faith Center:

City Attorney, Patricia A. Richardson

Brian Lawler
Lawler Burroughs & Baker, PC

STATE OF WASHINGTON)
)ss.
COUNTY OF KING)

On this day, personally appeared before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, Casey Treat to me known to be the President of CHRISTIAN FAITH CENTER, a Washington non-profit corporation, the corporation that executed the within and foregoing instrument, and acknowledged said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he/she is authorized to execute said instrument on behalf of said corporation.

Given under my hand and official seal this ____ day of _____, 2004.

(notary signature)

(typed/printed name of notary)
Notary Public in and for the State
of Washington.
My commission expires: _____

EXHIBIT A
TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT
LEGAL DESCRIPTIONS OF PROPERTY

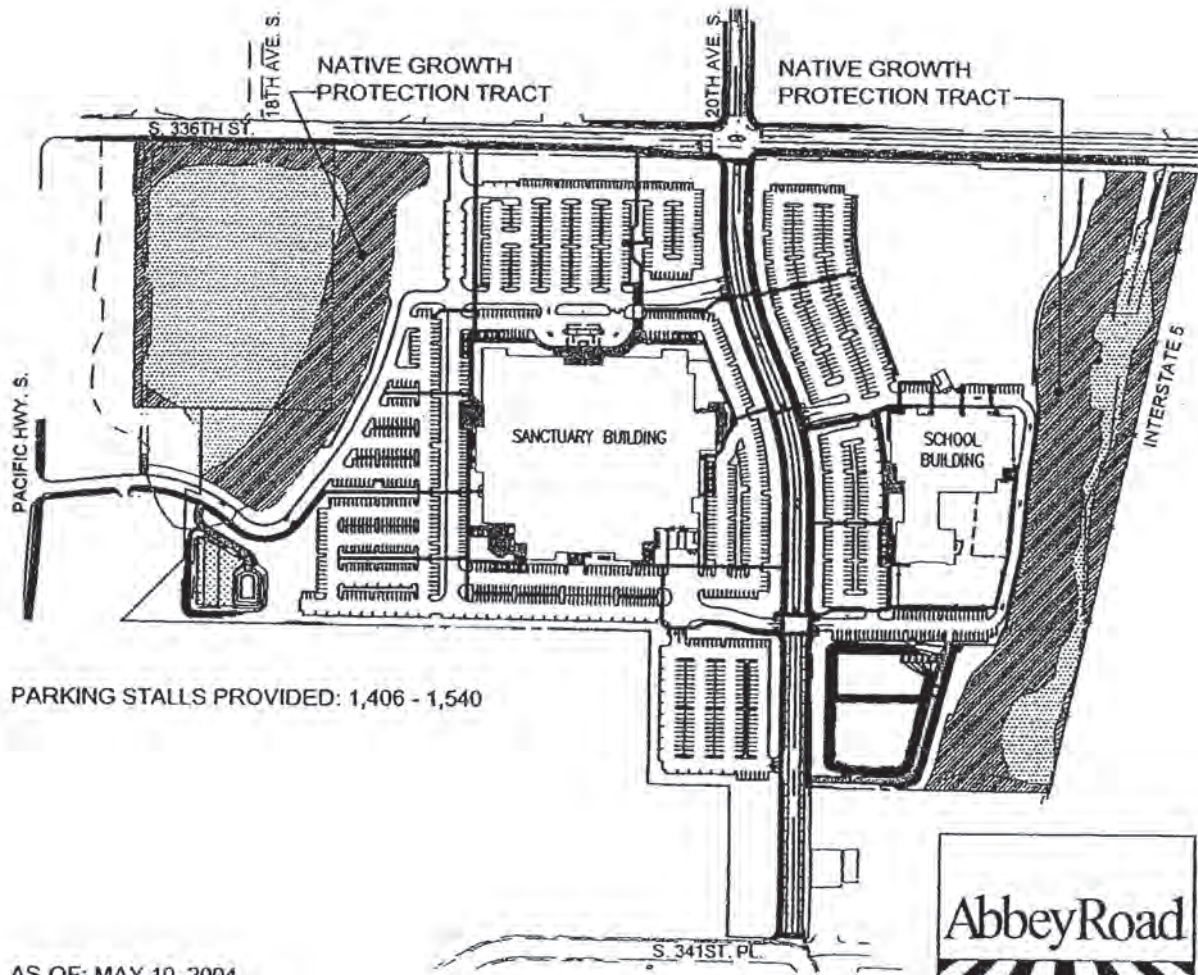
PER CHICAGO TITLE CO. ORDER #553764

PARCELS 1-6,8-9,11,12-13 & TAX LOT #59 IN THE NORTH 1/2 OF THE NW 1/4 OF SEC. 21,
T21N, R4E, W.M., KING COUNTY, WASHINGTON

TAX LOT #59
PER STATUTORY WARRANTY DEED
REC. #9706091592

THE NORTHEAST QUARTER OF THE WEST HALF OF THE NORTHWEST QUARTER OF
THE SOUTHEAST QUARTER OF THE NORTHWEST QUARTER OF SECTION 21,
TOWNSHIP 21 NORTH, RANGE 4 EAST, WILLAMETTE MERIDIAN, IN KING COUNTY,
WASHINGTON; EXCEPT THE SOUTH 30 FEET THEREOF CONVEYED TO KING COUNTY
FOR SOUTH 341 ST. PLACE BY INSTRUMENT RECORDED UNDER NUMBER 8410170757,
SAID INSTRUMENT BEING A RE-RECORD OF INSTRUMENT RECORDED UNDER
RECORDING NUMBER 8111020670.

EXHIBIT B
TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT
CHRISTIAN FAITH CENTER
DEVELOPMENT PLAN



AS OF: MAY 10, 2004

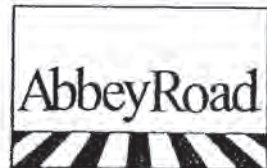


EXHIBIT C

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

LIST OF PERMITTED ACCESSORY USES

Christian Faith Center - Chart of Uses

SANCTUARY FIRST FLOOR		SF
Sanctuary/School Auditorium (Includes Stage) 4,500 Seats		42,586.43
Multi-purpose rooms		8,817.94
Bookstore with Café		3,702.16
Youth Church (Multi-purpose rooms/chapel)		14,095.82
Children's Church (Chapels, classrooms)		15,489.99
Daycare	33,054	17,563.60
Music Area - Choir Room (Room behind stage)		1,772.37
Other Areas (Storage facilities, mechanical rooms, computer/phone room, TV/audio department, baptismal, kitchen, distribution center, hallways, facilities offices, wedding chapel, meeting room, bathrooms, etc.)		60,292.97
Dominion College (Classrooms, offices)		2,581.72
	1st Floor Sub-total	166,903.00
SANCTUARY 2nd FLOOR		SF
Dominion College (Future multi-purpose rooms, classrooms, library and staff offices)		21,062.82
Administrative Offices		18,288.96
Other Areas (Storage facilities, Hallways, Bathrooms, etc.)		12,245.22
	2nd Floor Sub-total	51,597.00
	Grand Total	218,500.00
CHRISTIAN FAITH SCHOOL		SF
Christian Faith School (Private School) 900 Students		101,526.00
	Sub-total	101,526.00
	Total	101,526.00

EXHIBIT D

**TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT**

SETTLEMENT AGREEMENT

SETTLEMENT AGREEMENT

THIS AGREEMENT ("Agreement") made this 5th day of February, 1996, by and between the CITY OF FEDERAL WAY, a municipal corporation, hereinafter referred to as "CITY", and FEDERAL WAY INDUSTRIAL PARK, INC., a Washington corporation, hereinafter referred to as "FWIP".

WHEREAS, CITY commenced a Petition for Condemnation in the King County Superior Court under cause #95-2-19577-6; and

WHEREAS, the parties hereto have reached an agreement settling all claims in that condemnation action;

NOW, THEREFORE, THE PARTIES AGREE AS FOLLOWS:

1. The CITY OF FEDERAL WAY shall be granted an irrevocable, exclusive and permanent easement in the form attached hereto as Exhibit "I" and incorporated herein by this reference ("Easement") granting to the City the free and uninterrupted use over, across and through certain real property ("Property") located in Federal Way, King County, Washington and legally described in Exhibit "A" to the Easement. The City's rights shall be exercised upon that portion of the Property legally described in Exhibit "B" to the Easement ("Easement Area.")

2. In consideration of the grant of the Easement by FWIP to the CITY and upon execution of this Agreement and satisfaction of the contingencies set forth in Paragraph 17, the CITY shall pay to FWIP the sum of Five Thousand and no/100 Dollars (\$5,000.00) simultaneously with the recording of the Easement.

COPY OF

5.007
Exhibit "II", attached hereto, and by this reference fully incorporated ("Wetland Buffer Area"). The Wetland Buffer Area shall be applicable to all future developments on the Property.

5. FWIP shall be allowed by the CITY to handle storm water retention/detention for any project on the Property, by constructing, in compliance with then-applicable codes (which as of this date are found in the King County Surface Water Design Manual) and at its expense, such conveyance systems as are reasonably necessary to provide for direct gravity flow drainage of storm water from the Property, to the storm water facility which the CITY is constructing on the Easement Area, so as to eliminate the need for storm water retention/detention on those portions of the Property which naturally drain to the Easement Area. FWIP'S right to allow such drainage shall be limited to waters which currently naturally drain to the Easement Area and shall be limited to the initial development of the Property and shall not be extended to any redevelopment of the Property. "Initial development" shall mean the initial development of each phase of all of the Property.

6. The CITY agrees that the Easement Area may, at the option of FWIP, be included in any calculation of open space required for the development of the Property. The Easement Area may, at the option of FWIP, also be included in computing maximum lot coverage for development of the Property. Nothing herein shall relieve FWIP from complying with the City's landscape or other requirements for development.

7. The CITY shall pay all costs related to obtaining approval for and developing the Easement Area, as a storm water

request shall be reasonable in comparison to other similar proposals, such that the request is not used to circumvent the spirit of this provision.

11. CITY staff will support a proposal through lot line elimination to combine lot 2 and lot 3 of the short plat recorded under King County Auditor #8110300869 so as to be considered as one lot for development purposes.

12. CITY staff will support an application by FWIP to extend the parking lot improvements on lot 4 of the short plat recorded under King County Auditor #8110300869 into the Wetland Buffer Area up to the western toe of the slope of the berm forming the western boundary of the retention/detention facility, provided, that appropriate mitigation, determined pursuant to City codes, such as planting on the edge of the berm, is provided by FWIP. To the extent that the City staff requests mitigation for the loss of Wetland Buffer, said request shall be reasonable in comparison to other similar proposals, such that the request is not used to circumvent the spirit of this provision.

13. CITY staff will support a variance, pursuant to City codes, from the required lot size for lot 4 of the short plat recorded under King County Auditor #8110300869 to allow development of building improvements on said lot due to the limitations on the ability to combine lot 4 with other lots of the short plat.

14. CITY staff will support parking lot improvements in the portion of the Wetland Buffer Area south of the roadway of lot 2 of the short plat recorded under Auditor #8110300869 with appropriate mitigation costs, pursuant to City codes, to be provided by FWIP.

17. The obligations under this Agreement are conditioned upon and subject to final approval of this Agreement by the City Council of Federal Way.

18. This Agreement shall constitute the entire agreement between these parties. Any prior understanding or representation of any kind preceding the date of this Agreement shall not be binding on either party except to the extent incorporated in this document.

19. It is agreed that this Agreement will be governed by, construed and enforced in accordance with the Laws of the State of Washington.

20. Any modification of this Agreement or additional obligation assumed by either party in connection with this Agreement shall be binding only if evidenced by a writing signed by each party or an authorized representative of each party.

21. This Agreement may be executed in any number of counterparts, each of which shall be deemed to be an original, but all of which together shall constitute but one and the same instrument.

22. Except as otherwise expressly set forth in this Agreement, the rights and obligations of the parties shall be binding upon and inure to the benefit of their respective successors in interest and assigns.

23. In the event either of the parties defaults on the performance of any terms of this Agreement or either party places the enforcement of this Agreement in the hands of an attorney, or files a lawsuit, each party shall pay all its own attorney's fees,

INC., a Washington corporation, who executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he was authorized to execute the said instrument and that the seal affixed is the corporate seal of said corporation.

Witness my hand and official seal hereto affixed the day and year first above written.



Eileen Robinson

NOTARY PUBLIC in and for the State of Washington, residing at Federal Way. My appointment expires on 1-29-98.

STATE OF WASHINGTON)
 KING) ss.
COUNTY OF PIERCE)

On this 23rd day of February, 1996, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Kenneth E. Nyberg to me known to be the City Manager, respectively of the CITY OF FEDERAL WAY, a municipal corporation, who executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he was authorized to execute the said instrument and that the seal affixed is the corporate seal of said corporation.

Witness my hand and official seal hereto affixed the day and year first above written.



Eileen Robinson

NOTARY PUBLIC in and for the State of Washington, residing at Federal Way. My appointment expires on 1-29-98.

STATE OF WASHINGTON)
 KING) ss.
COUNTY OF PIERCE)

On this 8 day of FEBRUARY, 1996, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Helmut Wallenfels, to me known to be the Senior Legal Counsel of WEYERHAEUSER COMPANY, a Washington corporation, who executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he was authorized to execute the

FILED FOR RECORD AT REQUEST OF:

THIS SPACE RESERVED FOR
RECORDER'S USE:

Federal Way Industrial Park
(Applicant's Name)

MAIL TO:
CITY OF FEDERAL WAY
33530 1st Way South
FEDERAL WAY, WA 98003
ATTN: Londi K. Lindell

PERMANENT/EXCLUSIVE EASEMENT

For and in consideration of One Dollar (\$1.00) and other valuable consideration, the receipt of which is hereby acknowledged, Federal Way Industrial Park ("FWIP"), a Washington corporation ("Grantor"), grants, conveys and warrants to the CITY OF FEDERAL WAY, a Washington municipal corporation ("Grantee") for the purposes hereinafter set forth a perpetual, exclusive and permanent easement under, across and over certain real property (the "Property") located in Federal Way, Washington, legally described as follows:

Legal Description of Property attached hereto as Exhibit "A" and incorporated herein by this reference.

Except as may be otherwise set forth herein, Grantee's rights shall be exercised upon that portion of the Property ("Easement") legally described as follows:

Legal Description of Easement attached hereto as Exhibit "B" and incorporated herein by this reference.

1. **Purpose.** Grantee and its agents, designees and/or assigns shall have the perpetual, exclusive and permanent right, without prior notice to Grantor, at such times as deemed necessary by Grantee, to enter upon the Property to inspect, design, construct, reconstruct, operate, maintain, repair, replace, remove, grade, excavate, and enlarge all surface water facilities including, but not limited to, underground facilities and/or systems upon and/or under the Easement, together with all appurtenances thereto, including without limitation, outlet structures, control structures, pipes, catchbasins, manholes, retention and detention facilities, ponds, biofiltration swales, water quality treatment facilities, vaults and ditches ("Facilities"). Following the initial construction of the Facilities, Grantee may from time to time construct such additional facilities or improvements as it may require. Grantee shall have the right to flood the Easement. In addition to the foregoing, Grantee shall have the right to engage in any and all activities as if Grantee owned fee title to the Easement.
2. **Access.** If reasonable access to the Easement is not otherwise available, Grantee shall have the right of access to the Easement over and across the Property to enable Grantee to exercise its rights hereunder.
3. **Obstructions; Landscaping.** Grantee may remove any and all vegetation, trees, or other obstructions within the Easement, and may level and grade the Easement.
4. **Grantor's Use of Easement.** Except as hereafter provided, this Easement shall be exclusive to Grantee; provided, however, Grantor reserves the right to use the Easement in order to comply with City code requirements for open space, greenbelt or maximum lot coverage; provided, however, that such right does not include complying with the City's landscape code or other code requirements. Grantor may install, at its expense and in compliance with all applicable laws, such facilities as are reasonably necessary to provide for direct discharge of storm water from the Property to the Easement after obtaining all necessary permits. Grantor's right to use the Easement for purposes of calculating open space, green belts or maximum lot coverage shall not entitle Grantor to enter upon or disturb the Easement for any reason. Except as necessary to provide drainage facilities from the Property to the Easement, Grantor shall not perform digging, tunnelling or other form of construction activity on the Property, which would disturb the compaction or unearth the Facilities on the Easement, or endanger the lateral support to the Facilities. Grantor shall not blast within fifteen (15) feet of the Easement. Provided further as to the area described as "The East 175.5 feet of the North 30 feet of tract X of King County Short Plat No. 281074 and the South 30 feet of the Easement area of Lot 3 of the Plat," this Easement shall be non-exclusive and Grantor or its successors or assigns may construct a road and connect to existing utilities in said area, if done in compliance with applicable codes.

5. Indemnification. Grantor agrees to waive any and all claims relating to any damage to the Easement, including those resulting from surface water flooding and further to indemnify and hold Grantee, its elected officials, officers, employees, agents, and volunteers harmless from any and all claims, demands, losses, actions and liabilities (including costs and all attorney fees) to or by any and all persons or entities, including, without limitation, their respective agents, licensees, or representatives, arising from, resulting from, or connected with Grantor or Grantor's agents', employees', or invitees' negligent actions.

6. Successors and Assigns. The rights and obligations of the parties shall inure to the benefit of and be binding upon their respective successors in interest, heirs and assigns; provided, however, that Grantor's right to discharge storm water to the Easement shall be limited to waters which currently naturally drain to the Easement and shall only apply to the initial development of the Property and not to any redevelopment of the Property. All such redevelopment will be required to comply with all applicable laws and codes. "Initial development" shall mean the initial development of each phase of all of the Property.

7. No Encumbrances. Grantor shall maintain the Easement free of all encumbrances and defects and is prohibited from recording or taking any action which results in the recording of any lien, encumbrance or other defect against the Easement.

DATED THIS _____ day of _____, 1996.

GRANTOR

GRANTEE

FEDERAL WAY INDUSTRIAL PARK

CITY OF FEDERAL WAY

By: _____

By: _____
Kenneth E. Nyberg

Its: _____

Its: City Manager

MEYERHAEUSER COMPANY

APPROVED AS TO FORM:

By: _____

Its: Helmut Wallenfels
Senior Legal Counsel

Londi K. Lindell, City Attorney

STATE OF WASHINGTON)
) ss.
COUNTY OF _____)

On this _____ day of _____, 1996, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared _____ to me known to be the _____ of FEDERAL WAY INDUSTRIAL PARK, INC., the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he/she was authorized to execute said instrument and that the seal affixed, if any, is the corporate seal of said corporation.

WITNESS my hand and official seal hereto affixed the day and year first above written.

(typed/printed name of notary)
Notary Public in and for the State of Washington.
My commission expires: _____

STATE OF WASHINGTON)
) ss.
COUNTY OF _____)

On this _____ day of _____, 1996, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Kenneth E. Nyberg, to me known to be the City Manager of the City of Federal Way, a Washington municipal corporation, the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he was authorized to execute said instrument.

WITNESS my hand and official seal hereto affixed the day and year first above written.

(typed/printed name of notary)
Notary Public in and for the State of Washington.
My commission expires: _____

STATE OF WASHINGTON)
) ss.
COUNTY OF _____)

On this _____ day of _____, 1996, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared Helmut Wallenfels, to me known to be the Senior Legal Counsel of MEYERHAEUSER COMPANY, the corporation that executed the foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he was authorized to execute said instrument and that the seal affixed, if any, is the corporate seal of said corporation.

WITNESS my hand and official seal hereto affixed the day and year first above written.

(typed/printed name of notary)
Notary Public in and for the State of Washington.
My commission expires: _____

EXHIBIT "A" TO
PERMANENT/EXCLUSIVE EASEMENT

PARCEL A:

Lot 3, King County Short Plat No. 281074, according to short plat recorded under King County Recording Number 8110300869, being a portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington.

PARCEL B:

Lot 4 of King County Short Plat No. 281074 according to short plat recorded under King County Recording Number 8110300869, being a portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington.

PARCEL C:

That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:

Commencing at the northwest corner of said northwest quarter of the northwest quarter;
thence south $89^{\circ}13'33''$ east along the north line of said northwest quarter of the northwest quarter a distance of 261.26 feet;
thence south $00^{\circ}14'39''$ west a distance of 30.00 feet to the south right of way margin of South 336th Street and the TRUE POINT OF BEGINNING;
thence continuing south $00^{\circ}14'39''$ west a distance of 546.02 feet;
thence south $89^{\circ}13'33''$ east a distance of 399.45 feet;
thence north $00^{\circ}14'39''$ east a distance of 546.02 feet to the said south right of way margin of South 336th Street;
thence north $89^{\circ}13'33''$ west along said south right of way margin a distance of 399.44 feet to the TRUE POINT OF BEGINNING.

PARCEL D:

That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:
Commencing at the northwest corner of said northwest quarter of the northwest quarter;
thence south $89^{\circ}13'33''$ seconds east along the north line of said northwest quarter of the northwest quarter a distance of 813.80 feet;
thence south $00^{\circ}14'58''$ west a distance of 30.00 feet to the south right of way margin of South 336th Street and the TRUE POINT OF BEGINNING;
thence continuing south $00^{\circ}14'58''$ west a distance of 670.67 feet;
thence north $89^{\circ}16'45''$ west a distance of 153.10 feet;
thence north $00^{\circ}14'39''$ east a distance of 670.81 feet to the said south right of way margin of South 336th Street;
thence south $89^{\circ}13'33''$ east along said south right of way margin a distance of 153.10 feet to the TRUE POINT OF BEGINNING;
EXCEPT that portion deeded to King County for South 336th Street under Recording Number 8609030322.

**LEGAL DESCRIPTIC
PROPOSED EASEMENT ACQUISITIONS ON
STRANICK-JOHNSON PARCEL NO. 212104-9084**

That part of Lot 3, King County Short Plat No. 281074, according to short plat recorded under King County Recording Number 8110300869, being a portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington.

Being described as follows:

Beginning at the northwest corner of said Lot 3 and the TRUE POINT OF BEGINNING;

thence south $88^{\circ}15'52''$ east a distance of 162.06 feet;

thence south $23^{\circ}35'30''$ west a distance of 231.61 feet to a point on a non-tangent curve having a radius of 300.00 feet;

thence along said curve to the right 32.63 feet through a central angle of $06^{\circ}13'56''$;

thence north $59^{\circ}09'15''$ west a distance of 27.40 feet to the beginning of a curve having a radius of 300.00 feet;

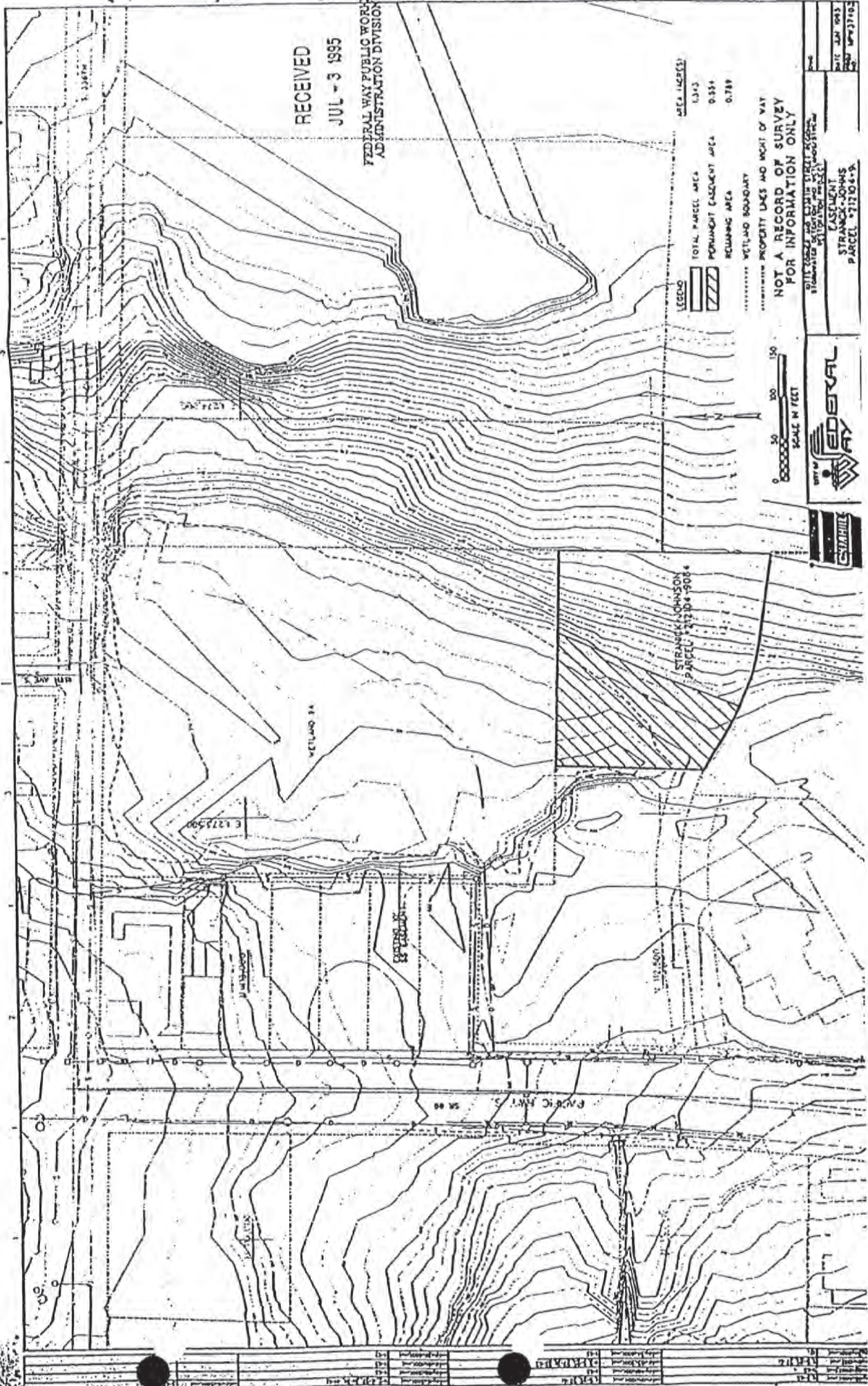
thence along said curve to the left 25.27 feet through a central angle of $04^{\circ}49'33''$;

thence north $01^{\circ}44'08''$ east a distance of 175.99 feet to the TRUE POINT OF BEGINNING.

**EXHIBIT "B" TO
PERMANENT/EXCLUSIVE EASEMENT**

EXHIBIT "B" TO
PERMANENT/EXCLUSIVE EASEMENT

Pg. 2 of 8



STABILE
 FEDERAL CITY

CASTLETON
 STRANCK JOHNSON
 PARCEL 272 BA 1504

DATE: JUL 03 1995
 TIME: 10:15 AM
 DRAWN: [Signature]

**LEGAL DESCRIPTION
PROPOSED EASEMENT ACQUISITIONS ON
STRANICK-JOHNSON PARCEL NO. 212104-9026**

That part of Lot 4 of King County Short Plat No. 281074 according to short plat recorded under King County Recording Number 8110300869, being a portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington.

Being described as follows:

The North 30 feet of said Lot 4

Also

The East 140 feet of said Lot 4

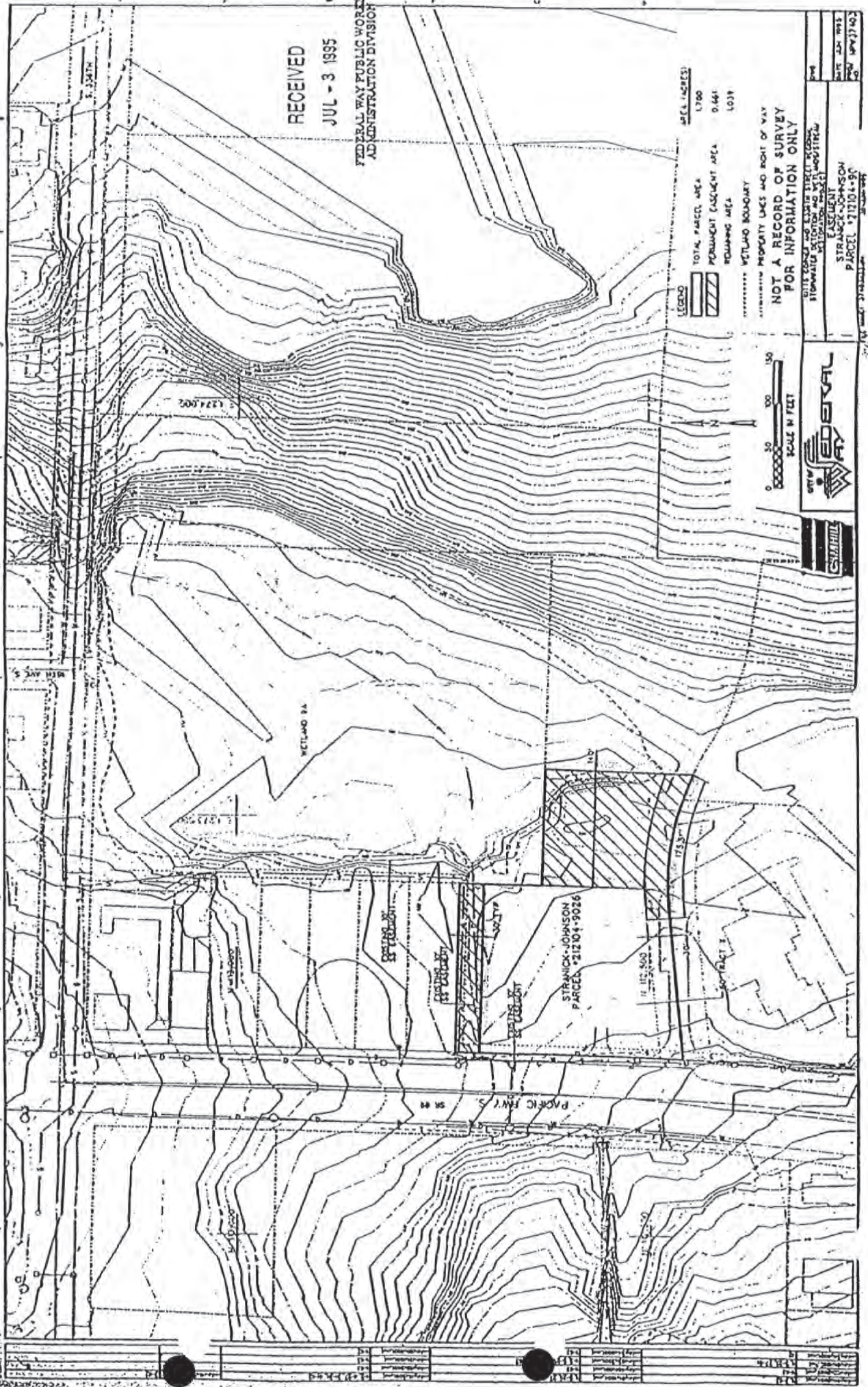
Also

The East 175.50 feet of the North 30 feet of Tract X of said short plat No. 281074.

**EXHIBIT "B" TO
PERMANENT/EXCLUSIVE EASEMENT**

EXHIBIT "B" TO
PERMANENT/EXCLUSIVE EASEMENT

Pg. 4 of 8



**LEGAL DESCRIPTION
PROPOSED EASEMENT ACQUISITIONS ON
STRANICK-JOHNSON PARCEL NO. 212104-9067**

That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:

Commencing at the northwest corner of said northwest quarter of the northwest quarter;
thence south $89^{\circ} 13'33''$ east along the north line of said northwest quarter of the northwest quarter a distance of 813.80 feet;
thence south $00^{\circ} 14'58''$ west a distance of 30.00 feet to the south right of way margin of South 336th Street;
thence north $89^{\circ} 13'33''$ west along said south right of way margin a distance of 100.82 feet and the TRUE POINT OF BEGINNING;
thence south $00^{\circ} 14'58''$ west a distance of 181.30 feet;
thence south $22^{\circ} 37'48''$ west a distance of 137.29 feet;
thence north $00^{\circ} 14'58''$ east to the south right of way margin a distance of 308.73 feet;
thence south $89^{\circ} 13'33''$ east along said south right of way margin a distance of 52.29 feet to the TRUE POINT OF BEGINNING.;
EXCEPT that portion deeded to King County for South 336th Street under Recording Number 8609030322.

Being a portion of the following described property:

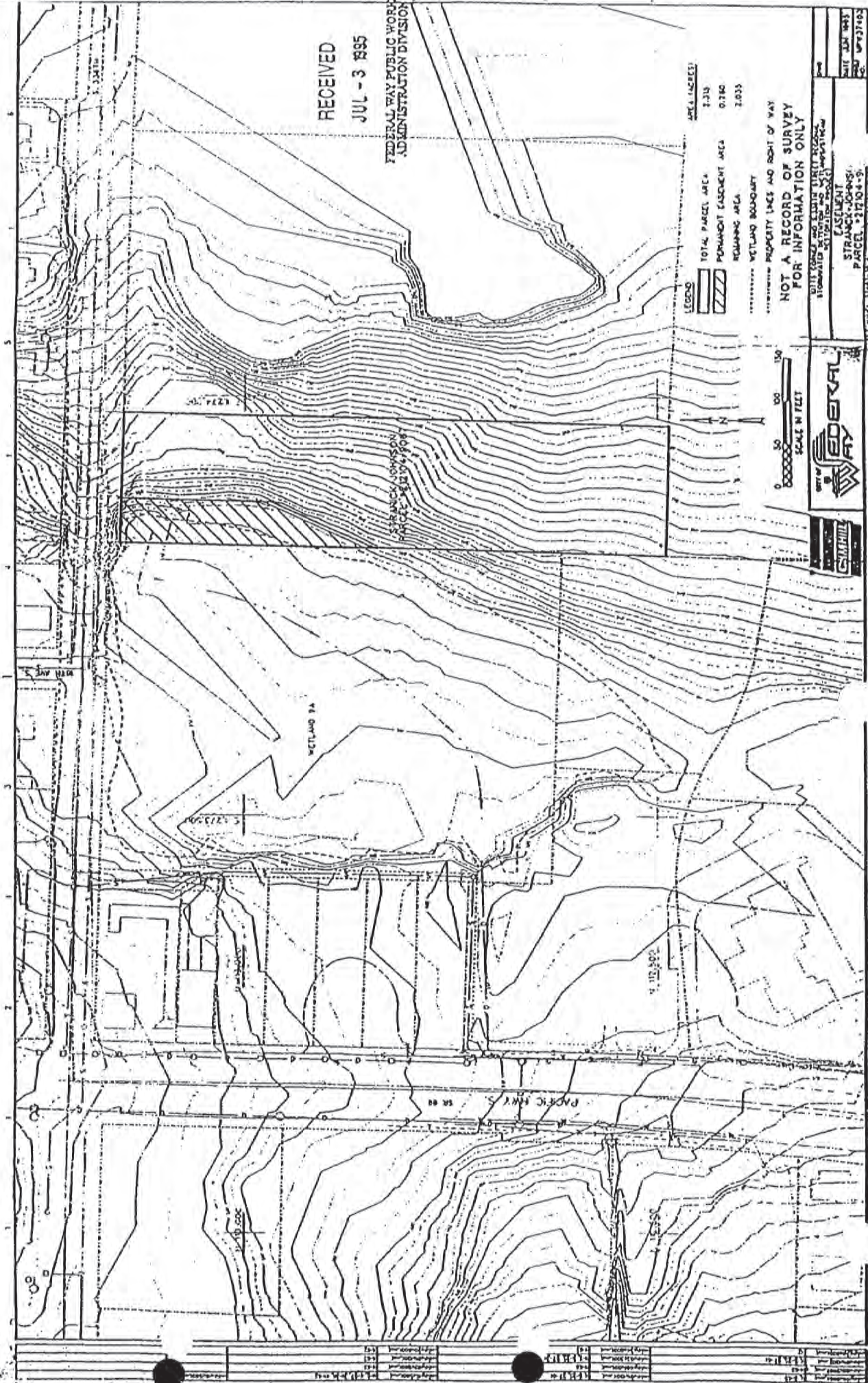
That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:

Commencing at the northwest corner of said northwest quarter of the northwest quarter;
thence south $89^{\circ} 13'33''$ east along the north line of said northwest quarter of the northwest quarter a distance of 813.80 feet;
thence south $00^{\circ} 14'58''$ west a distance of 30.00 feet to the south right of way margin of South 336th Street and the TRUE POINT OF BEGINNING;
thence continuing south $00^{\circ} 14'58''$ west a distance of 670.67 feet;
thence north $89^{\circ} 16'45''$ west a distance of 153.10 feet;
thence north $00^{\circ} 14'39''$ east a distance of 670.81 feet to the said south right of way margin of South 336th Street;
thence south $89^{\circ} 13'33''$ east along said south right of way margin a distance of 153.10 feet to the TRUE POINT OF BEGINNING;
EXCEPT that portion deeded to King County for South 336th Street under Recording Number 8609030322.

EXHIBIT "B" TO
PERMANENT/EXCLUSIVE EASEMENT

EXHIBIT "B" TO
PERMANENT/EXCLUSIVE EASEMENT

Pg. 6 of 8



STRANCK, JOHNS
PARCEL # 21104-5

**LEGAL DESCRIPTION
PROPOSED EASEMENT ACQUISITIONS ON
STRANICK-JOHNSON PARCEL NO. 212104-9069**

That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:

Commencing at the northwest corner of said northwest quarter of the northwest quarter;
thence south $89^{\circ} 13'33''$ east along the north line of said northwest quarter of the northwest quarter a distance of 261.26 feet;
thence south $00^{\circ} 14'39''$ west a distance of 30.00 feet to the south right of way margin of South 336th Street and the TRUE POINT OF BEGINNING;
thence continuing south $00^{\circ} 14'39''$ west a distance of 546.02 feet;
thence south $89^{\circ} 13'33''$ east a distance of 302.06 feet;
thence north $22^{\circ} 37'48''$ east a distance of 255.66;
thence north $00^{\circ} 14'39''$ east a distance of 308.73 feet to the said south right of way margin of South 336th Street;
thence north $89^{\circ} 13'33''$ west along said south right of way margin a distance of 399.44 feet to the TRUE POINT OF BEGINNING.

Being a portion of the following described property:

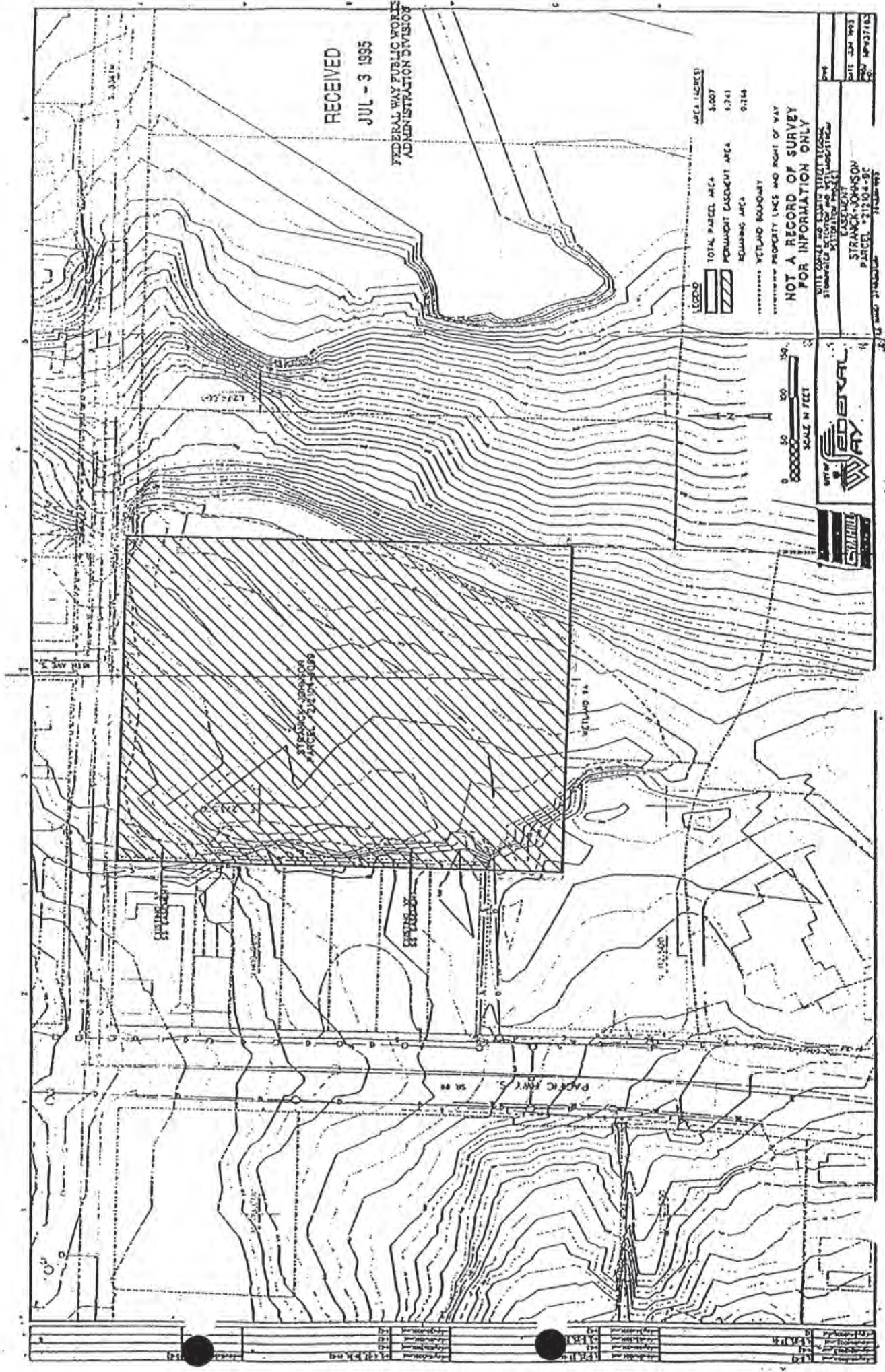
That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:

Commencing at the northwest corner of said northwest quarter of the northwest quarter;
thence south $89^{\circ} 13'33''$ east along the north line of said northwest quarter of the northwest quarter a distance of 261.26 feet;
thence south $00^{\circ} 14'39''$ west a distance of 30.00 feet to the south right of way margin of South 336th Street and the TRUE POINT OF BEGINNING;
thence continuing south $00^{\circ} 14'39''$ west a distance of 546.02 feet;
thence south $89^{\circ} 13'33''$ east a distance of 399.45 feet;
thence north $00^{\circ} 14'39''$ east a distance of 546.02 feet to the said south right of way margin of South 336th Street;
thence north $89^{\circ} 13'33''$ west along said south right of way margin a distance of 399.44 feet to the TRUE POINT OF BEGINNING.

EXHIBIT "B" TO
PERMANENT/EXCLUSIVE EASEMENT

EXHIBIT "B" TO
PERMANENT/EXCLUSIVE EASEMENT

Pg. 8 of 8



RECEIVED
JUL - 3 1995

FEDERAL WAY PUBLIC WORKS
ADMINISTRATION DIVISION

LEGEND

Symbol	Area (Acres)
[Hatched Box]	TOTAL PARCEL AREA 5.007
[Hatched Box]	PERMANENT EASEMENT AREA 6.241
[Hatched Box]	REMAINING AREA 9.248

..... PRIORITY LINES AND RIGHT OF WAY
NOT A RECORD OF SURVEY
FOR INFORMATION ONLY

UNIT COVERED BY THIS INSTRUMENT
BROWNSVILLE, TEXAS
EASEMENT
STRANCK JOHNSON
PARCEL #212104-9C
DATE JUN 1993
BY MPA37163

SCALE IN FEET
0 50 100 150

STARRILL
ED STAY

EXHIBIT "II" TO
SETTLEMENT AGREEMENT

LEGAL DESCRIPTION
WETLAND AND SETBACK
STRANICK-JOHNSON PARCEL NO. 212104-9084

That part of Lot 3, King County Short Plat No. 281074, according to short plat recorded under King County Recording Number 8110300869, being a portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington.

Being described as follows:

Beginning at the northeast corner of said Lot 3 and the TRUE POINT OF BEGINNING;
thence south 32°41'52" west a distance of 78.31 feet;
thence south 37°15'37" west a distance of 39.29 feet;
thence south 40°11'22" west a distance of 50.40 feet;
thence south 49°02'32" west a distance of 84.35 feet;
thence south 67°33'51" west a distance of 26.93 feet;
thence south 45°20'35" west a distance of 9.06 feet to the south line of said Lot 3 and a point on a non-tangent curve from which the radius point bears north 25°22'36" east;
thence along said south line through a 300 foot radius curve to the right, with a central angle of 05°28'06", an arc length of 28.63 feet;
thence north 59°09'19" west a distance of 27.40 feet;
thence along a 300 foot radius curve to the left, with a central angle of 04°49'33", an arc length of 25.27 feet to the west line of said Lot 3;
thence along said west line, north 01°44'08" east a distance of 175.99 feet to the north line of said Lot 3;
thence along said north line, south 88°15'52" east a distance of 259.45 feet to the TRUE POINT OF BEGINNING.
Containing an area of 0.864 acres.



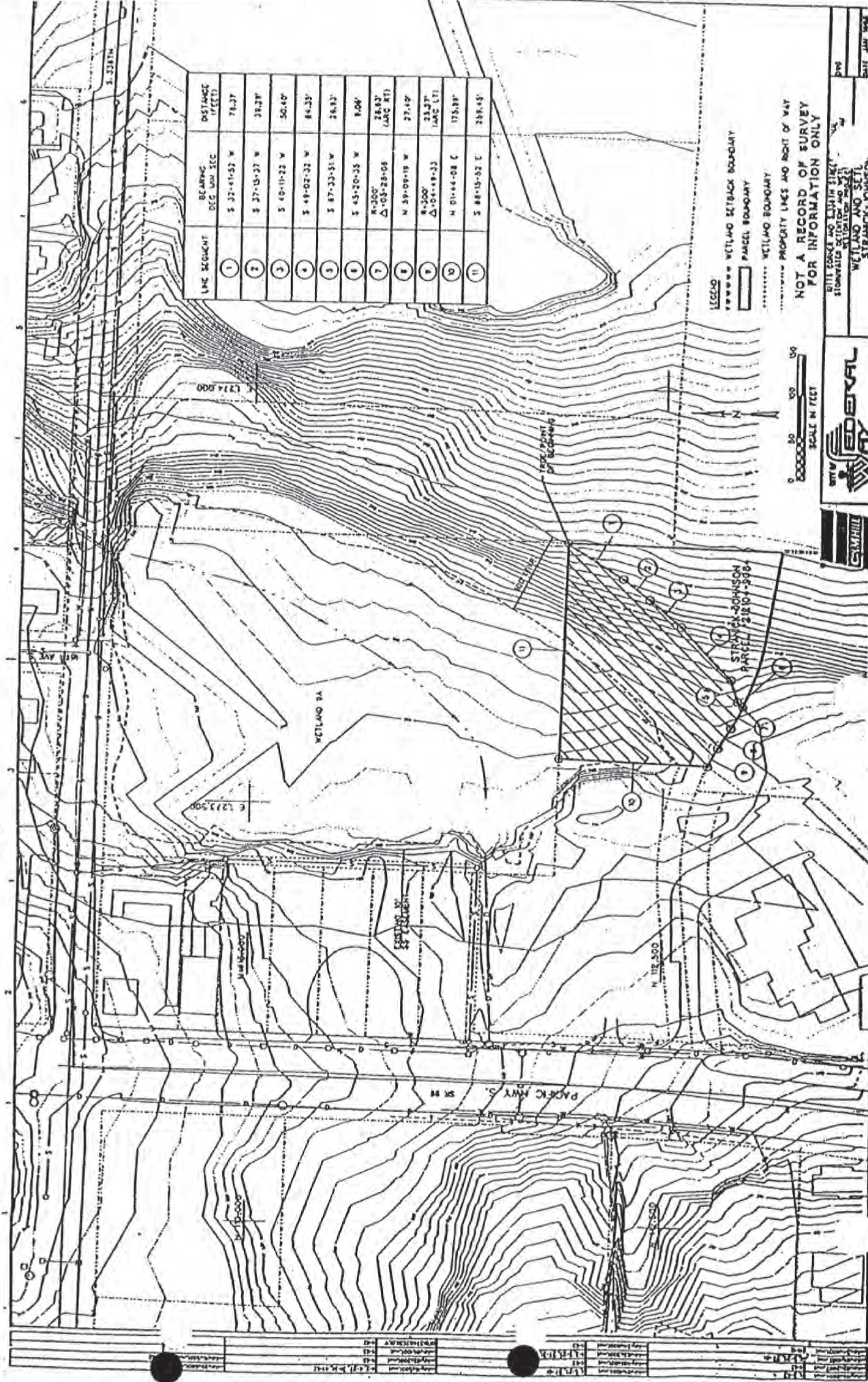
fwld9084.wp5

Pg. 1 of 9

EXHIBIT "II" TO
SETTLEMENT AGREEMENT

EXHIBIT "II" TO
SETTLEMENT AGREEMENT

Pg. 2 of 9



DATE: JAN 2004
 SHEET: 2 OF 9
 PROJECT: STRANZA-JOHNSON PARCEL 2810-288
 SURVEYOR: STRANZA-JOHNSON SURVEYING & CONSULTING, INC.
 1111 E. 11TH STREET, SUITE 100, DENVER, CO 80202
 PHONE: (303) 733-1111
 FAX: (303) 733-1112
 WWW: WWW.SJSURV.COM

STRANZA-JOHNSON
 SURVEYING & CONSULTING, INC.

**LEGAL DESCRIPTION
WETLAND AND SETBACK
STRANICK-JOHNSON PARCEL NO. 212104-9026**

That part of Lot 4 of King County Short Plat No. 281074 according to short plat recorded under King County Recording Number 8110300869, being a portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington.

Being described as follows:

Commencing at the northwest corner of said Lot 4;
thence along the north line of said Lot 4, south $88^{\circ}15'53''$ east a distance of 116.96 feet to the TRUE POINT OF BEGINNING;
thence along the north line of said Lot 4, south $88^{\circ}15'53''$ east a distance of 82.96 feet;
thence along the east line of said Lot 4, south $01^{\circ}12'17''$ west a distance of 100.00 feet;
thence along the north line of said Lot 4, south $88^{\circ}15'53''$ east a distance of 140.00 feet;
thence along the east line of said Lot 4, south $01^{\circ}44'08''$ west a distance of 175.99 feet to the south line of said Lot 4 and a point on a non-tangent curve from which the radius point bears south $26^{\circ}01'09''$ west;
thence along said south line through a 300 foot radius curve to the left, with a central angle of $21^{\circ}00'20''$, an arc length of 109.98 feet to a point on a non-tangent curve from which the radius point bears north $70^{\circ}49'35''$ east;
thence through a 100 foot radius curve to the right, with a central angle of $38^{\circ}16'07''$, an arc length of 66.79 feet;
thence north $45^{\circ}55'34''$ west a distance of 40.72 feet to a point on a non-tangent curve from which the radius point bears north $07^{\circ}40'45''$ east;
thence through a 100 foot radius curve to the right, with a central angle of $88^{\circ}34'17''$, an arc length of 154.59 feet;
thence north $06^{\circ}05'23''$ east a distance of 49.78 feet to the TRUE POINT OF BEGINNING.
Containing an area of 0.716 acres.

fwld9026.wp5

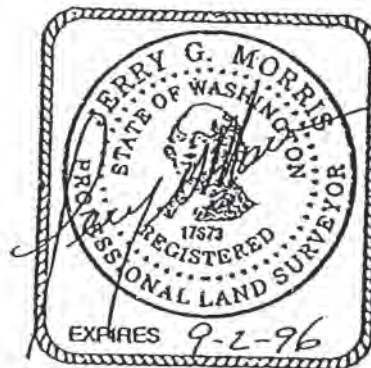
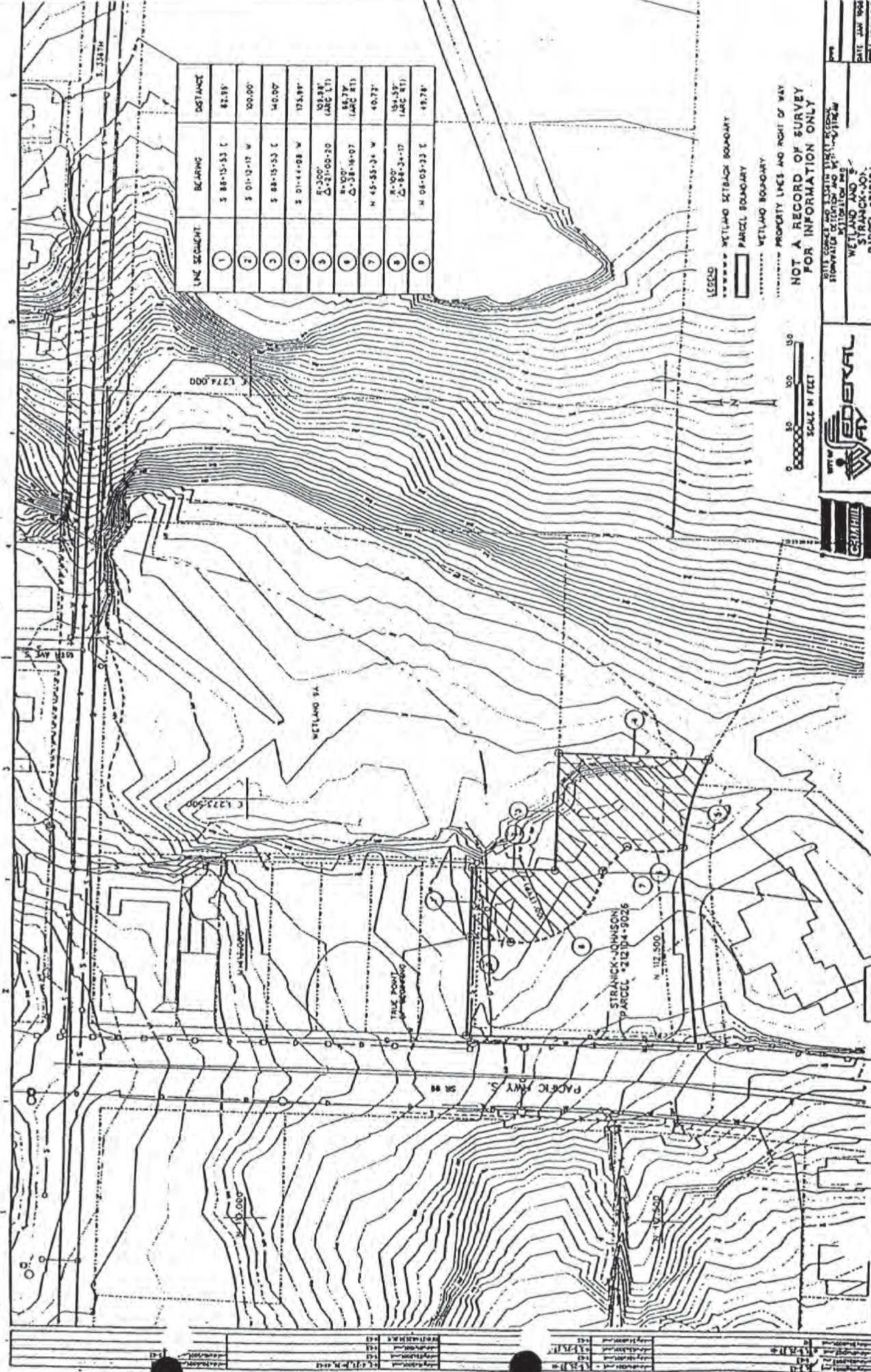


EXHIBIT "II" TO
SETTLEMENT AGREEMENT

EXHIBIT "II" TO
SETTLEMENT AGREEMENT

Pg. 4 of 9



LINE SEGMENT	BEARING	DISTANCE
1	S 88°15'53" E	82.85'
2	S 01°13'17" W	100.00'
3	S 88°15'53" E	140.00'
4	S 01°44'08" W	175.89'
5	S 2°00'00" W Δ 21°00'10" (ARC L1)	103.88'
6	S 0°00'00" W Δ 38°16'07" (ARC R1)	86.79'
7	N 45°55'34" W	40.72'
8	S 0°00'00" W Δ 88°30'17" (ARC R1)	154.53'
9	N 06°03'33" E	49.78'

LEGEND
 - - - - - WETLAND SETBACK BOUNDARY
 _____ PARCEL BOUNDARY
 - - - - - WETLAND BOUNDARY
 - - - - - PROPERTY LINES AND RIGHT OF WAY

SCALE IN FEET
 0 50 100 150

NOT A RECORD OF SURVEY
 FOR INFORMATION ONLY

THIS SURVEY WAS MADE IN PART BY
 STANLEY A. STRANCK AND
 WETLAND AND SETBACK
 SURVEYING, INC.
 1000 S. 10TH ST.
 SUITE 100
 MILWAUKEE, WI 53214
 DATE: JAN 2014



**LEGAL DESCRIPTION
WETLAND AND SETBACK
STRANICK-JOHNSON PARCEL NO. 212104-9067**

That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:

Commencing at the northwest corner of said northwest quarter of the northwest quarter; thence south 89°13'33" east along the north line of said northwest quarter of the northwest quarter a distance of 813.80 feet;
thence south 00°14'58" west a distance of 30.00 feet to the south right of way margin of South 336th Street;
thence north 89°13'33" west along said south right of way margin a distance of 27.58 feet to the TRUE POINT OF BEGINNING;
thence south 12°03'08" east a distance of 40.46 feet
thence south 07°31'30" west a distance of 41.08 feet
thence south 04°45'10" west a distance of 57.84 feet
thence south 10°37'22" west a distance of 52.16 feet
thence south 16°21'59" west a distance of 56.28 feet
thence south 10°58'46" west a distance of 43.83 feet
thence south 23°54'07" west a distance of 14.53 feet
thence south 07°11'32" west a distance of 38.28 feet
thence south 21°58'46" west a distance of 37.77 feet
thence south 08°31'59" west a distance of 41.88 feet
thence south 24°20'39" west a distance of 91.29 feet
thence south 31°04'46" west a distance of 32.34 feet
thence south 19°31'25" west a distance of 20.75 feet
thence north 00°14'39" east a distance of 546.07 feet to the south right of way margin of South 336th Street;
thence south 89°13'33" east along said south right of way margin a distance of 125.52 feet to the TRUE POINT OF BEGINNING;
EXCEPT that portion deeded to King County for South 336th Street under Recording Number 8609030322.
Containing an area of 1.053 acres.

Being a portion of the following described property:

That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:

Commencing at the northwest corner of said northwest quarter of the northwest quarter; thence south 89°13'33" east along the north line of said northwest quarter of the northwest quarter a distance of 813.80 feet;

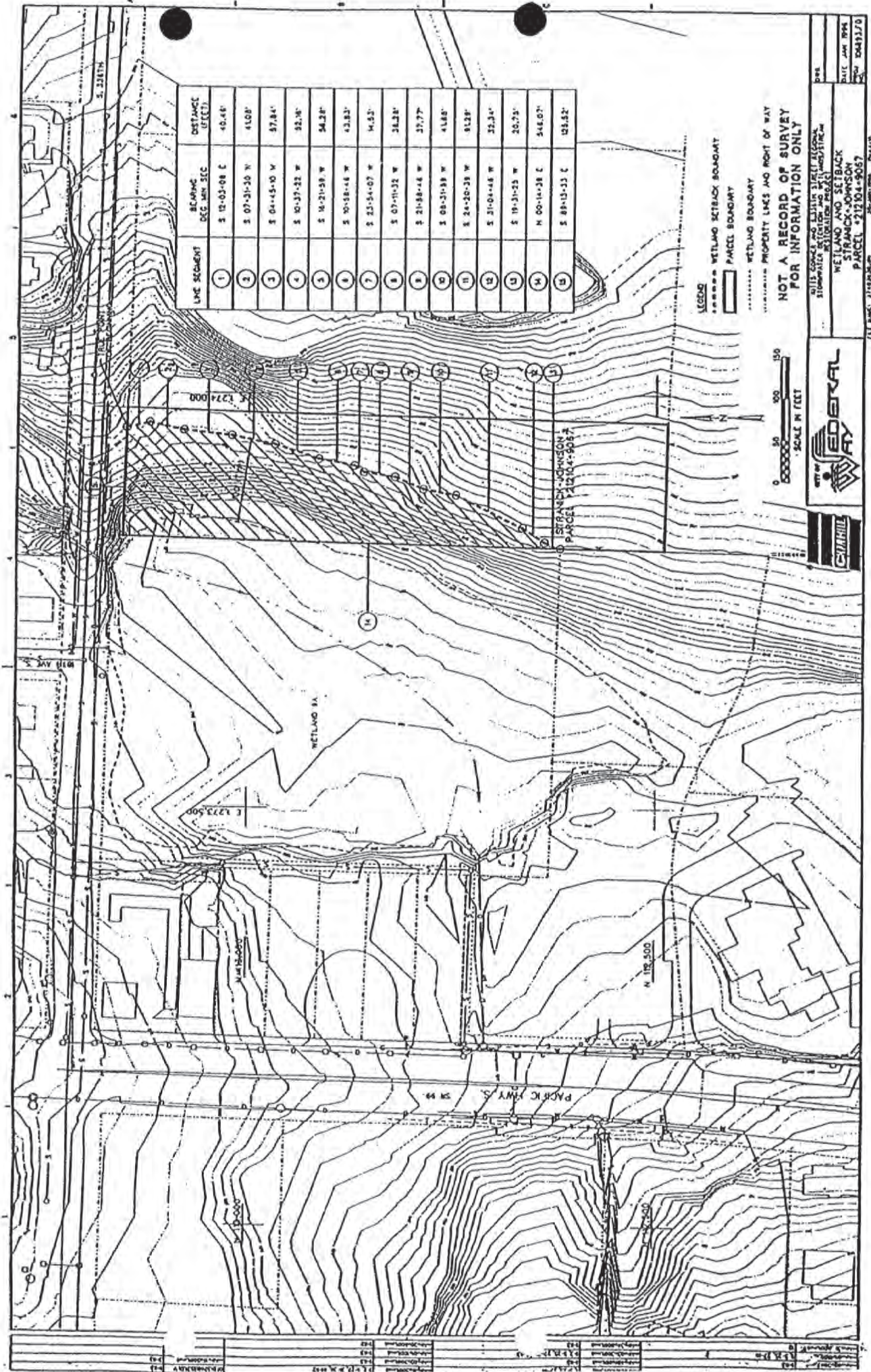
**EXHIBIT "II" TO
SETTLEMENT AGREEMENT**

thence south 00°14'58" west a distance of 30.00 feet to the south right of way margin of South 336th Street and the TRUE POINT OF BEGINNING;
thence continuing south 00°14'58" west a distance of 670.67 feet;
thence north 89°16'45" west a distance of 153.10 feet;
thence north 00°14'39" east a distance of 670.81 feet to the said south right of way margin of South 336th Street;
thence south 89°13'33" east along said south right of way margin a distance of 153.10 feet to the TRUE POINT OF BEGINNING;
EXCEPT that portion deeded to King County for South 336th Street under Recording Number 8609030322.
Containing an area of 2.313 acres.



EXHIBIT "II" TO
SETTLEMENT AGREEMENT

Pg. 7 of 9



**LEGAL DESCRIPTION
WETLAND AND SETBACK
STRANICK-JOHNSON PARCEL NO. 212104-9069**

That portion of the northwest quarter of the northwest quarter of Section 21, Township 21 North, Range 4 East, W.M., in King County, Washington, described as follows:

Commencing at the northwest corner of said northwest quarter of the northwest quarter, thence south $89^{\circ}13'33''$ east along the north line of said northwest quarter of the northwest quarter a distance of 261.26 feet;
thence south $00^{\circ}14'39''$ west a distance of 30.00 feet to the south right of way margin of South 336th Street and the TRUE POINT OF BEGINNING;
thence continuing south $00^{\circ}14'39''$ west a distance of 546.02 feet;
thence south $89^{\circ}13'33''$ east a distance of 399.45 feet;
thence north $00^{\circ}14'39''$ east a distance of 546.02 feet to the said south right of way margin of South 336th Street;
thence north $89^{\circ}13'33''$ west along said south right of way margin a distance of 399.44 feet to the TRUE POINT OF BEGINNING.
Containing an area of 5.007 acres.



fwld9069.wp5

Pg. 8 of 9

EXHIBIT "II" TO
SETTLEMENT AGREEMENT
1

EXHIBIT "II" TO
SETTLEMENT AGREEMENT

Pg. 9 of 9

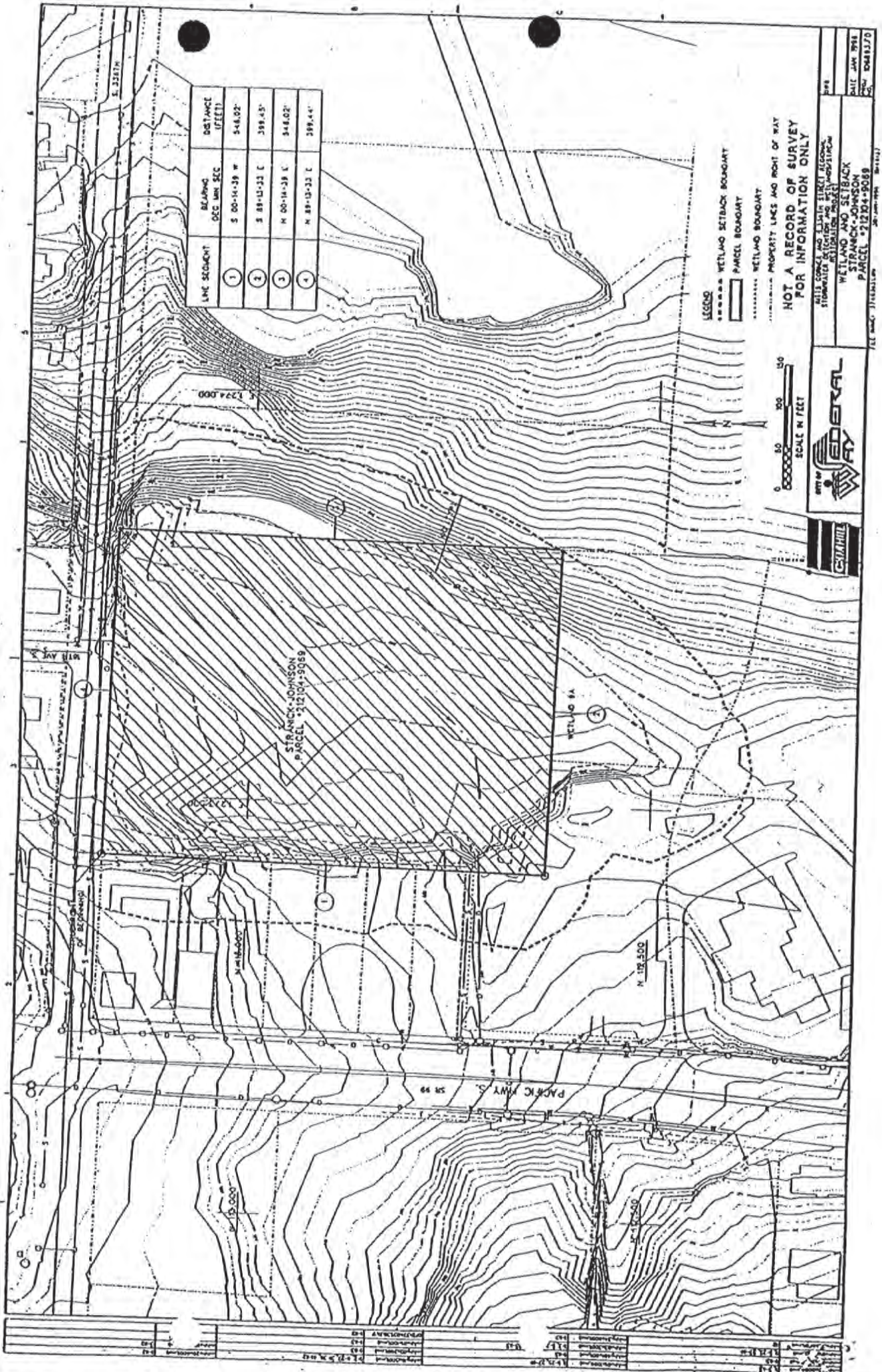


EXHIBIT E

**TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT**

JUNE 12, 2003 PARKING LETTER



CITY HALL
33530 1st Way South
PO Box 9718

(253) 661-4000
Federal Way, WA 98063-9718

June 12, 2003

Gil Hulsmann
Abbey Road Group, LLC
PO Box 207
Puyallup, WA 98371

FILE COPY

RE: *Christian Faith Center (City File No. 02-102271-UP)*
Your request dated 5/8/03 concerning drive aisle width and vehicle overhang

Dear Mr. Hulsmann:

City staff have reviewed the above referenced request with the following responses.

Drive aisle width

The Director of Community Development Services will allow the requested 24-foot drive aisle width in place of the city's typical width of 25 feet, but only at locations where the adjacent stall dimensions are 9 feet by 18 feet, irrespective of overhangs. Drive aisles serving compact-sized stalls or reduced-length stalls resulting from overhang allowances must have a 25-foot width. Per city standards, up to 25% of the total stalls on the site may be designated as compact, with a stall dimension of 8 feet by 15 feet (served by a 25 foot drive aisle).

The City will allow the requested 24-foot drive aisles, as described above, on a "demonstration" basis and in the interest of reducing pervious surface and increasing landscaping along with other low impact development techniques the City has recommended and the applicant is considering for the project. It should also be noted that this decision is consistent with the three example codes you submitted, where a 24-foot drive aisle is permitted when adjacent stall dimensions are 9 feet by 18 feet or greater. It is also consistent with parking standards contained in the 1990 handbook of the American Association of State Highways and Transportation Officials (AASHTO).

Vehicle overhang

The requested vehicle overhang into landscaping is already permitted by code and requires no modification. However, per code, wherever a parking stall will be reduced in length by vehicle overhang into landscaping, the required width of the landscaping must be maintained. In addition, any overhang into a sidewalk area must maintain a 5-foot unobstructed sidewalk width. Therefore, the width of landscape areas and sidewalks shall be increased accordingly where necessary to meet this standard. For example, a 2-foot overhang into a required 10-foot landscape strip would require the landscape strip to be increased to a width of 12 feet. Likewise, a 2-foot overhang into a 5-foot sidewalk would require the sidewalk to be increased to a width of 7 feet. Full-sized stalls against required landscaping or a sidewalk must incorporate wheel stops to prevent overhang.

Please let me know if you have any further questions or concerns on these topics.

Sincerely,

Lori Michaelson, AICP
Senior Planner

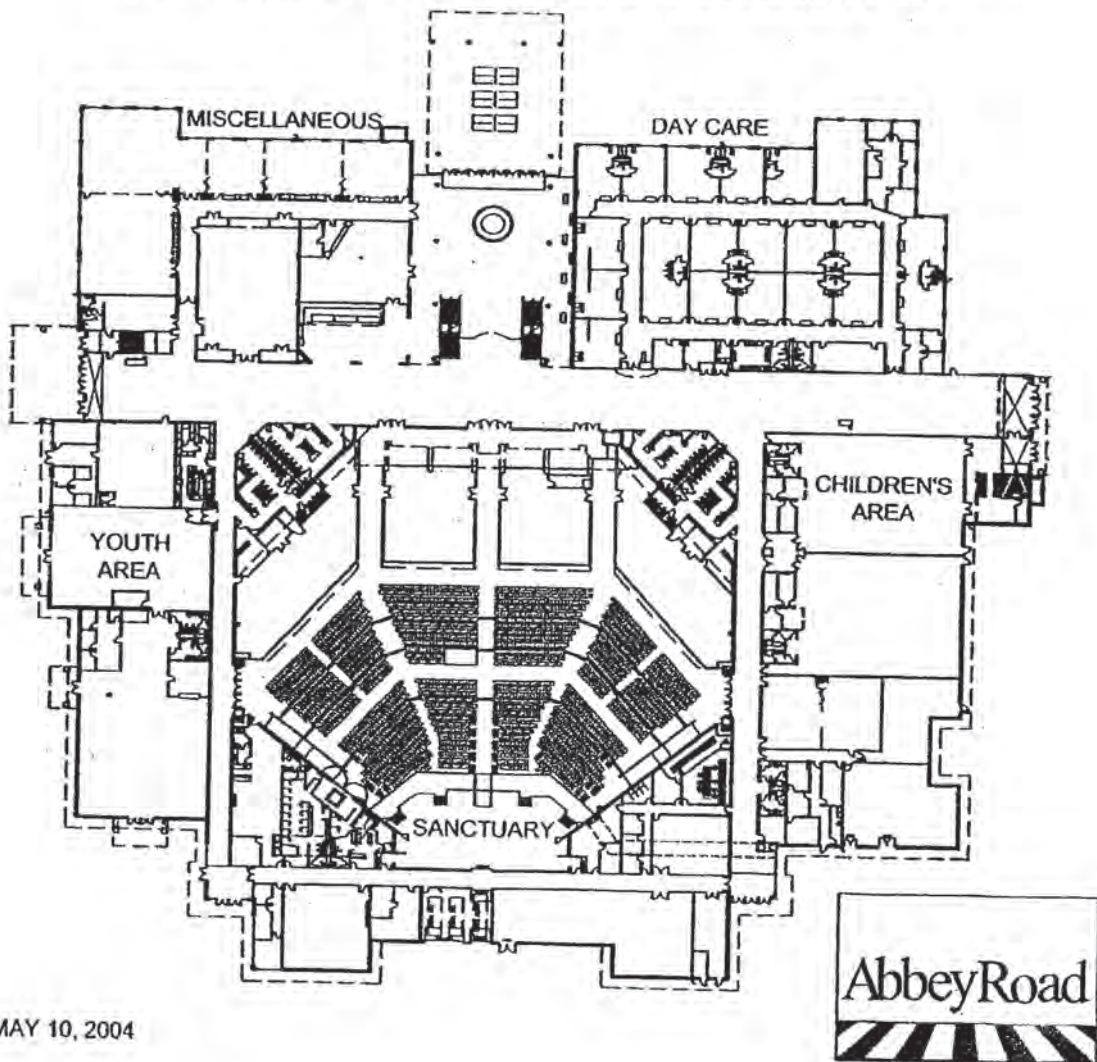
C
Kathy McClung, Director of Community Development Services
Cary Roe, Director of Public Works
Ken Miller, Deputy Director of Public Works
Greg Fewins, Deputy Director of Community Development Services
Jim Ferling, Development Services Manager

EXHIBIT F
TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT
CONCEPTUAL FLOOR PLAN

EXHIBIT F-1

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

CONCEPTUAL SANCTUARY BUILDING FIRST FLOOR PLAN

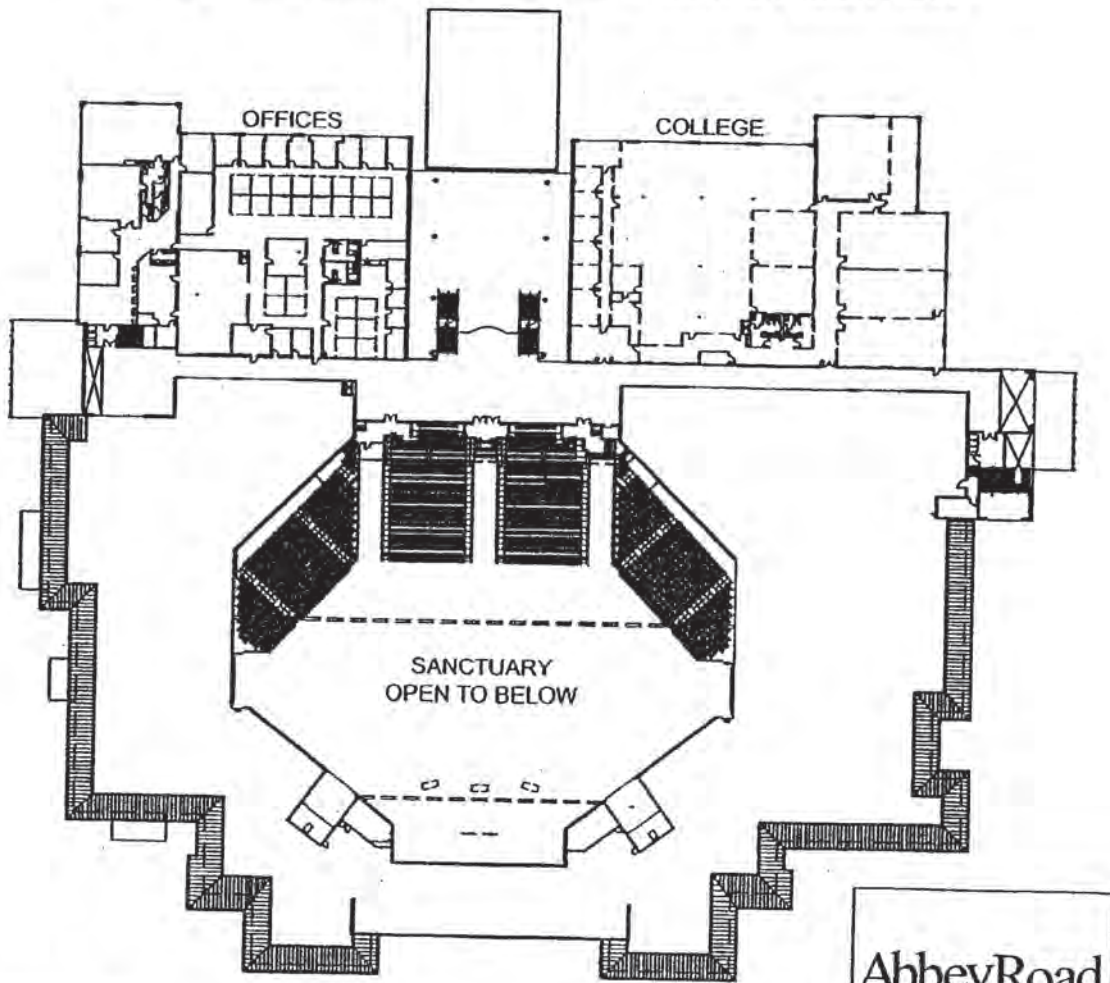


AS OF: MAY 10, 2004

EXHIBIT F-2

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

CONCEPTUAL SANCTUARY BUILDING SECOND FLOOR PLAN



AS OF: MAY 10, 2004

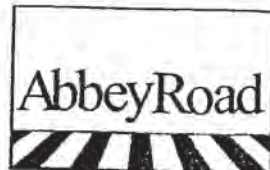
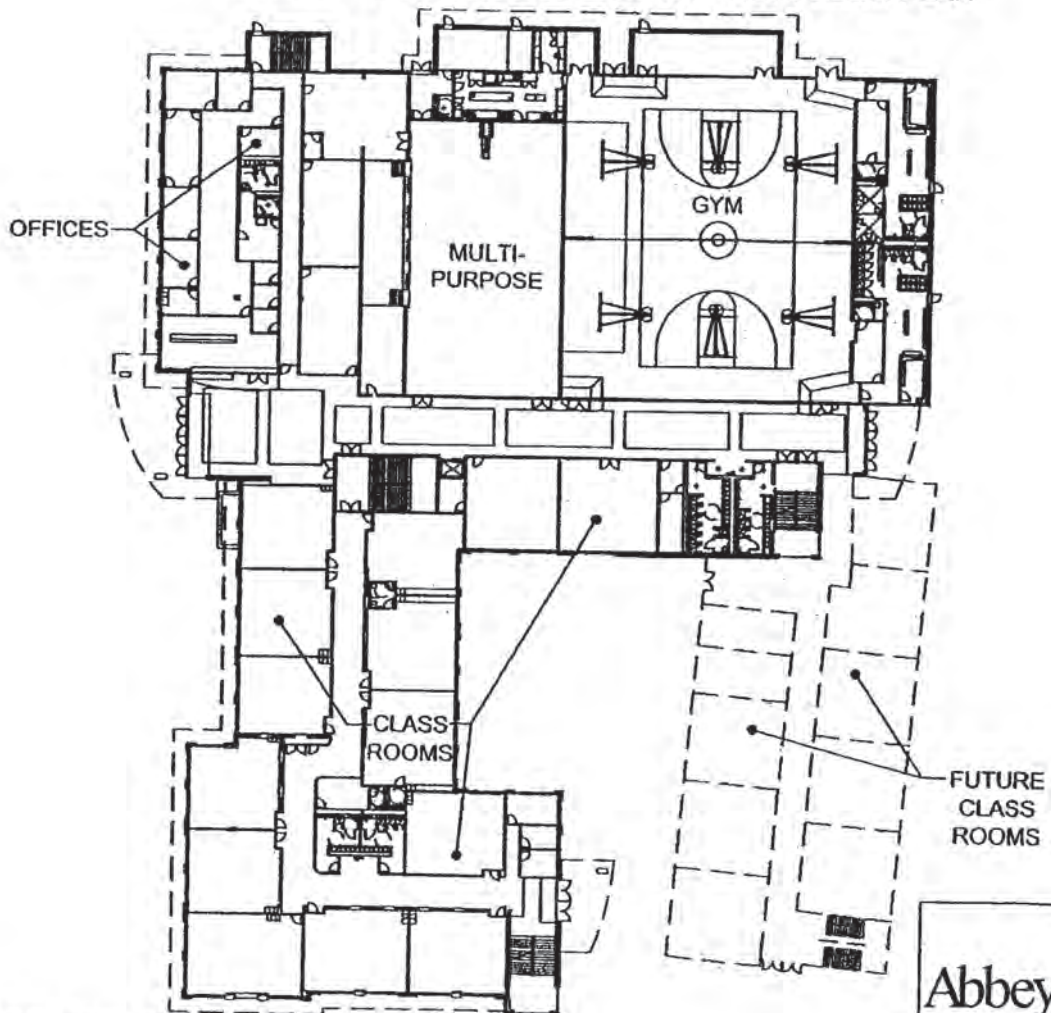


EXHIBIT F-3

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

CONCEPTUAL SCHOOL BUILDING FIRST FLOOR PLAN



AS OF: MAY 10, 2004

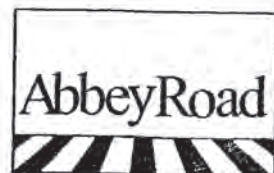
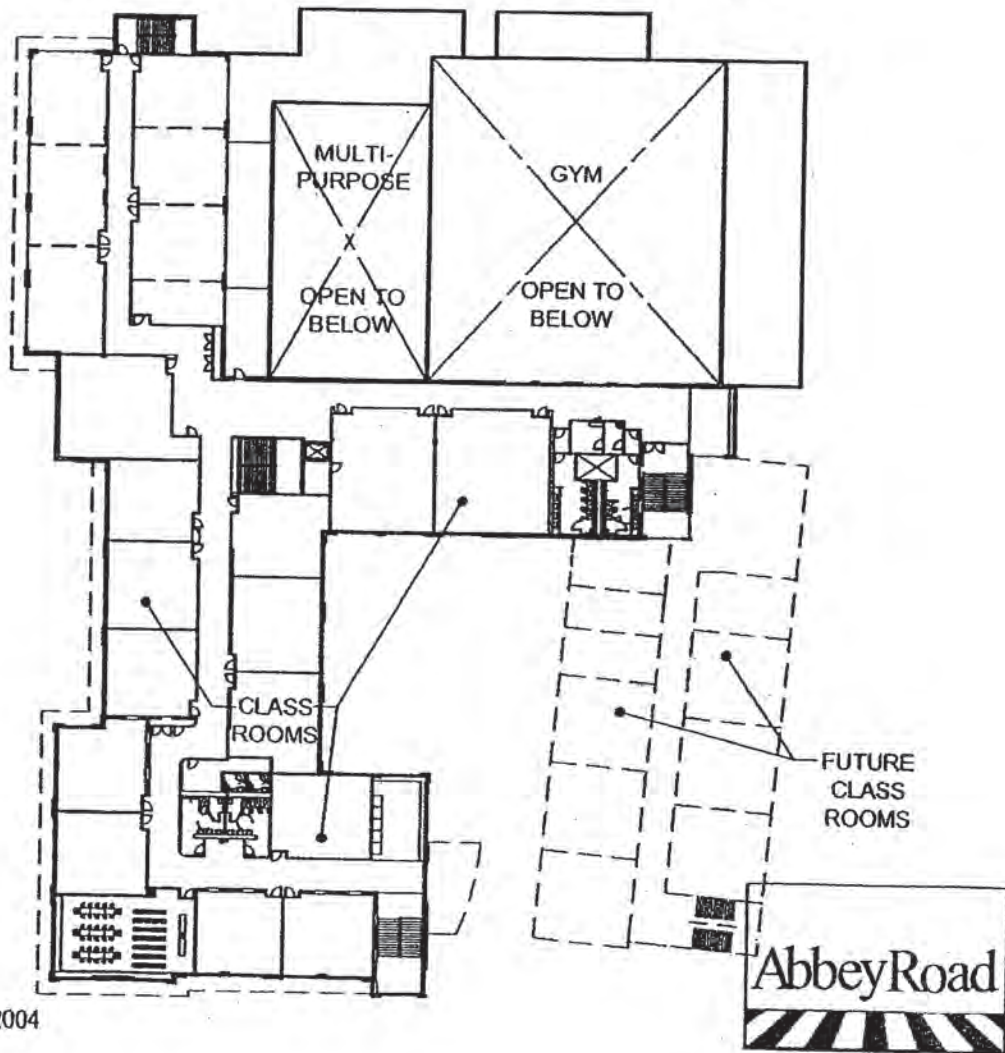


EXHIBIT F-4

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

CONCEPTUAL SCHOOL BUILDING FIRST FLOOR PLAN



AS OF: MAY 10, 2004

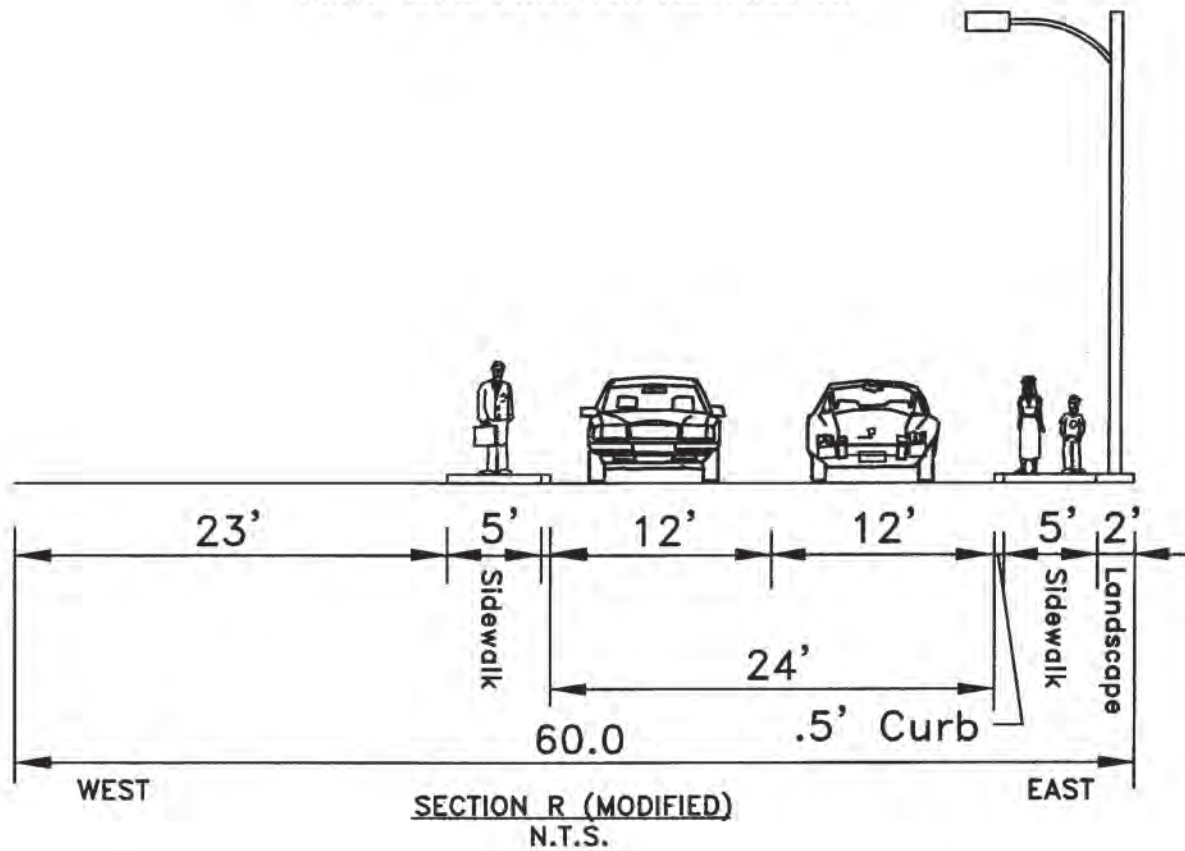
EXHIBIT G

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

SECTION 9.4 TRAFFIC PLANS

- G-1 18th Ave S
- G-2 S 344th from 16th to 18th
- G-3 34th/16th
- G-4 SR 99/S 344th
- G-5 336th from Hwy 99 to 20th
- G-6 336th from 20th to I-5
- G-7 20th Ave/336th
- G-8 20th Avenue S traffic calming

EXHIBIT G-1
 TO CONCOMITANT AGREEMENT
 AND
 DEVELOPMENT AGREEMENT
 18TH PLACE SOUTH IMPROVEMENTS



NOTE:
 UTILITIES WILL REMAIN ABOVE GROUND.

AS OF: July 8, 2004

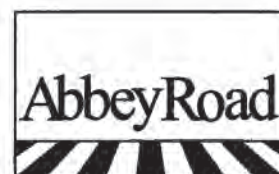
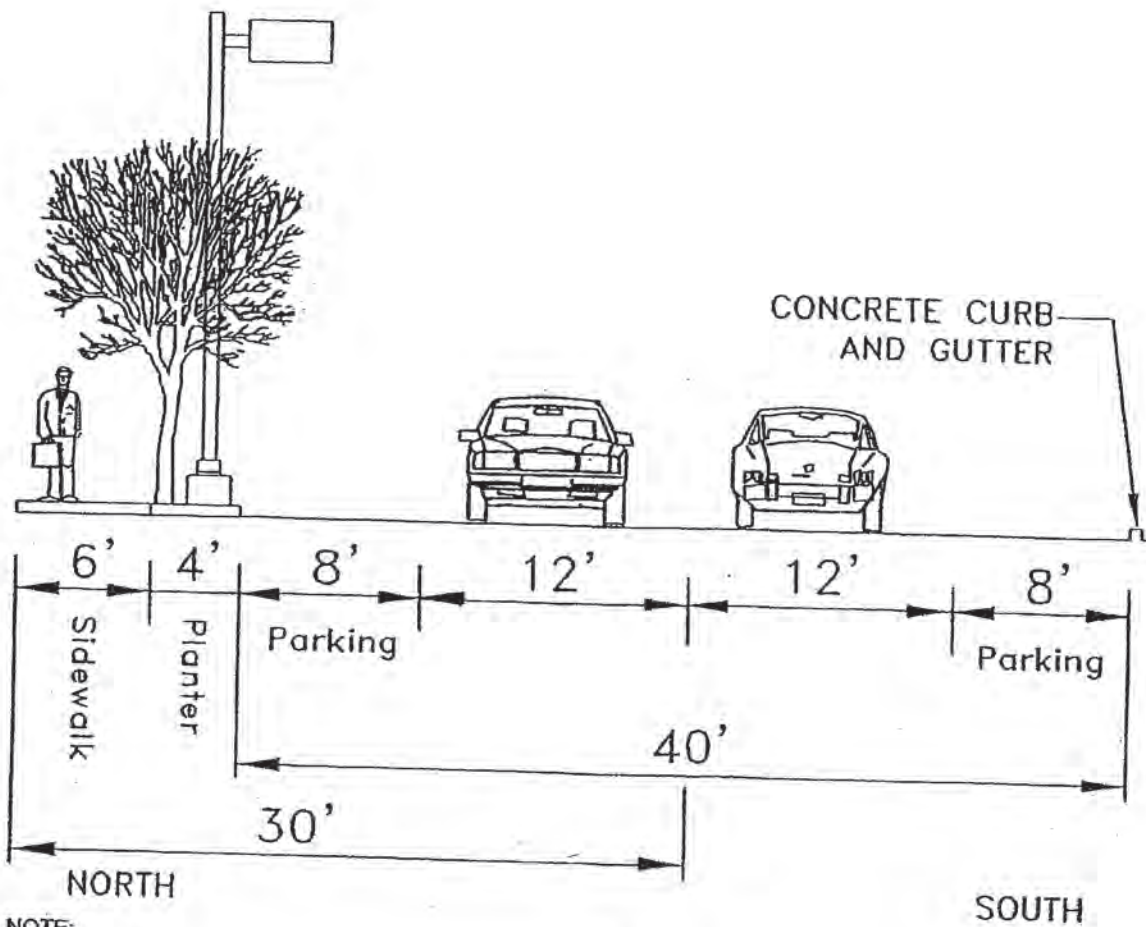


EXHIBIT G-2

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

SOUTH 344TH STREET IMPROVEMENTS
16TH AVENUE SOUTH TO 18TH PLACE SOUTH



NOTE:
NORTH IMPROVEMENTS TIE INTO EXISTING IMPROVEMENTS
EAST OF 16TH AVE. S. AND S. 344TH ST. INTERSECTION.
UTILITIES TO REMAIN ABOVE GROUND.

AS OF: MAY 10, 2004

SECTION R
N.T.S.

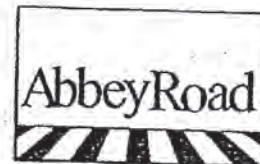
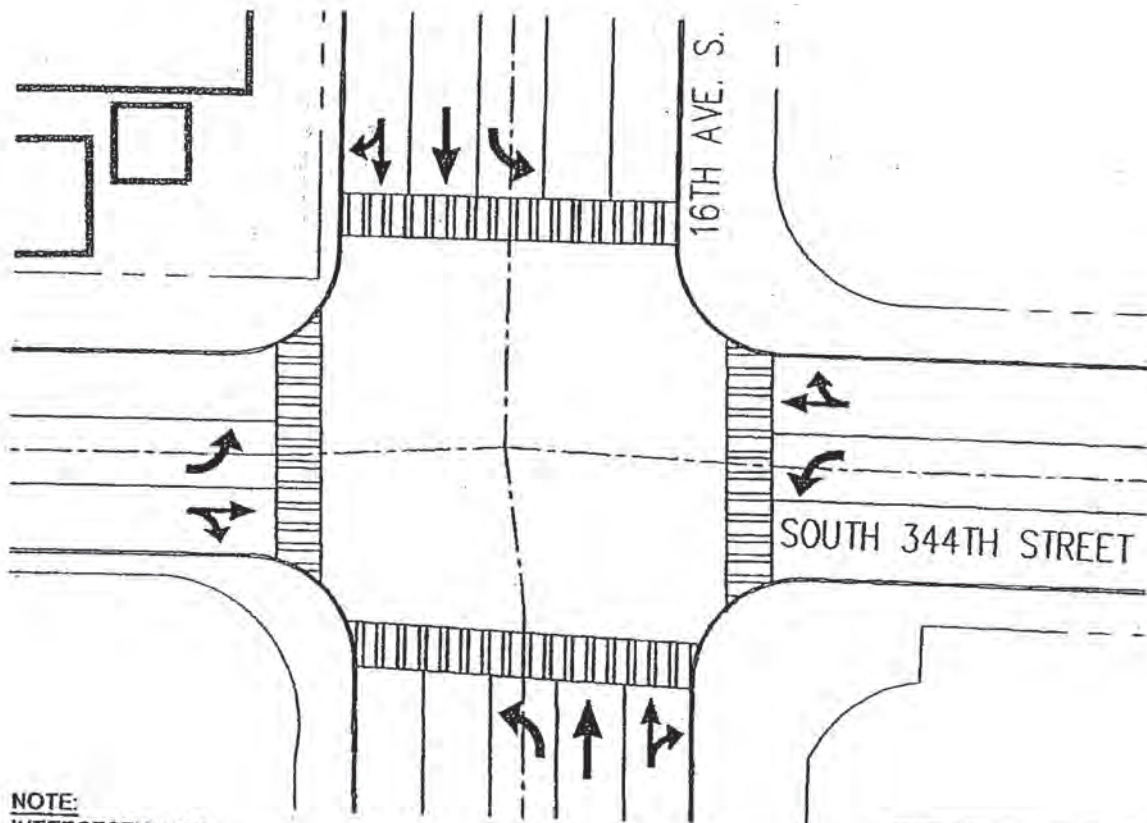


EXHIBIT G-3

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

16TH AVENUE SOUTH AND
SOUTH 344TH STREET INTERSECTION



NOTE:
INTERSECTION TO
BE SIGNALIZED

AS OF: MAY 10, 2004

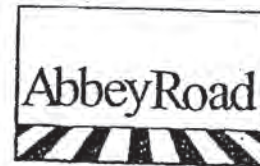
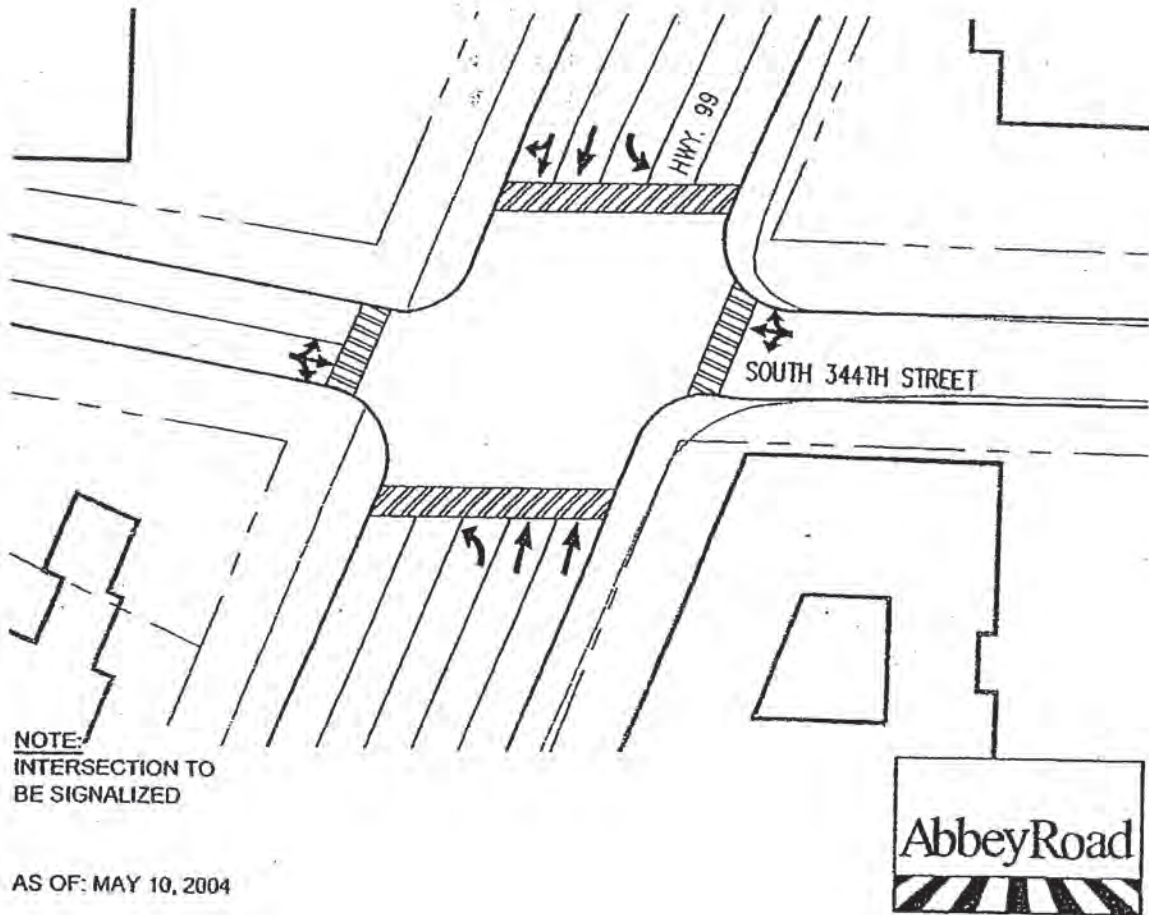


EXHIBIT G-4

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

SOUTH 344TH STREET AND
HWY. 99 INTERSECTION

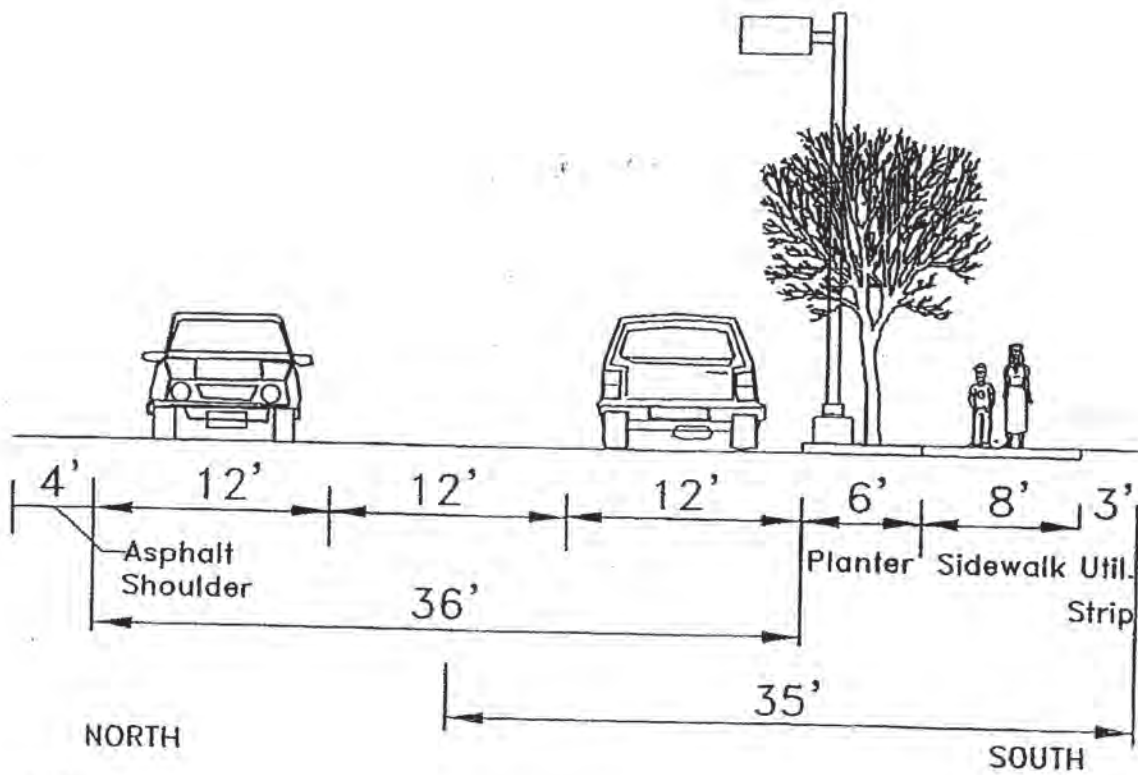


AS OF: MAY 10, 2004

EXHIBIT G-5

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

SOUTH 336TH STREET IMPROVEMENTS
HWY. 99 TO 20TH AVENUE SOUTH



NOTE:
PLANTER AND UTILITY STRIP MAYBE MODIFIED AT WEST
HYLEBOS CULVERT CROSSING(S) TO PROTECT WETLAND
AND WETLAND BUFFER.

SECTION M
N.T.S.

AS OF: MAY 10, 2004

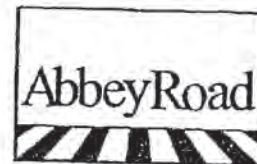
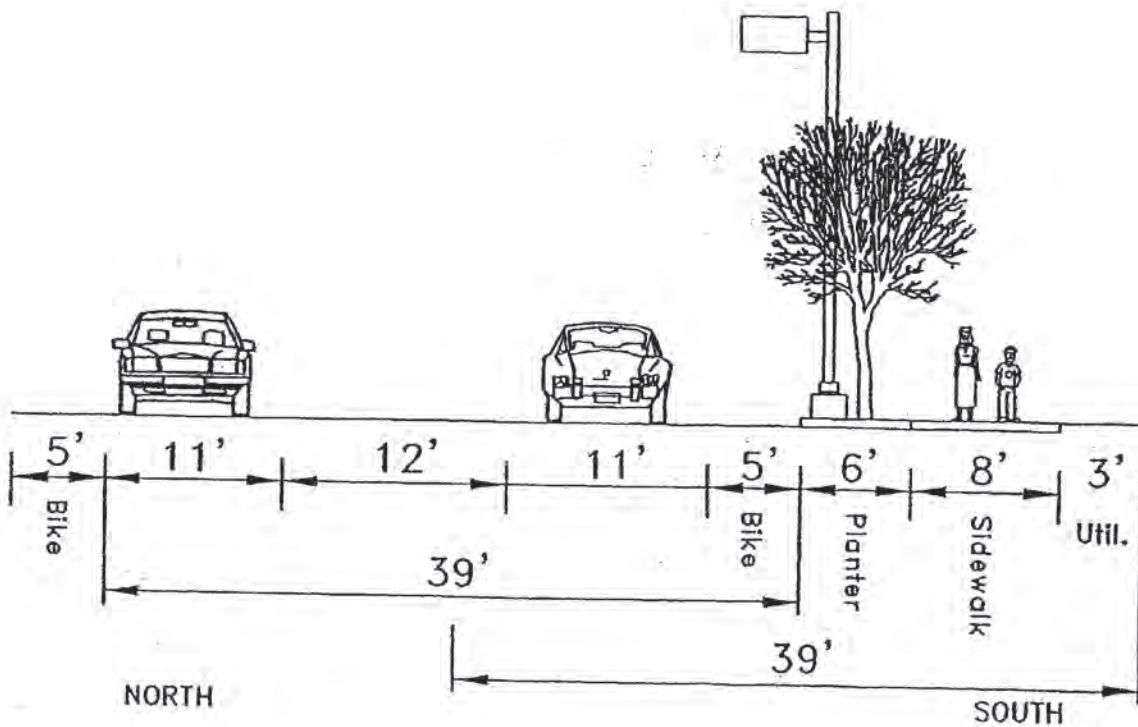


EXHIBIT G-6

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

SOUTH 336TH STREET IMPROVEMENTS
20TH AVENUE SOUTH INTERSTATE-5



NOTE:
PLANTER, SIDEWALK, STREET TREES AND UTILITIES STRIP STOPS
50' WEST OF EAST HYLEBOS BRANCH CULVERT(S) TO
PROTECT WETLAND AND WETLAND BUFFER. SECTION K

AS OF: MAY 10, 2004

N.T.S.

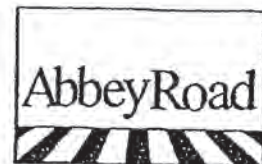


EXHIBIT G-7

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

20TH AVENUE SOUTH AND
SOUTH 336TH STREET INTERSECTION

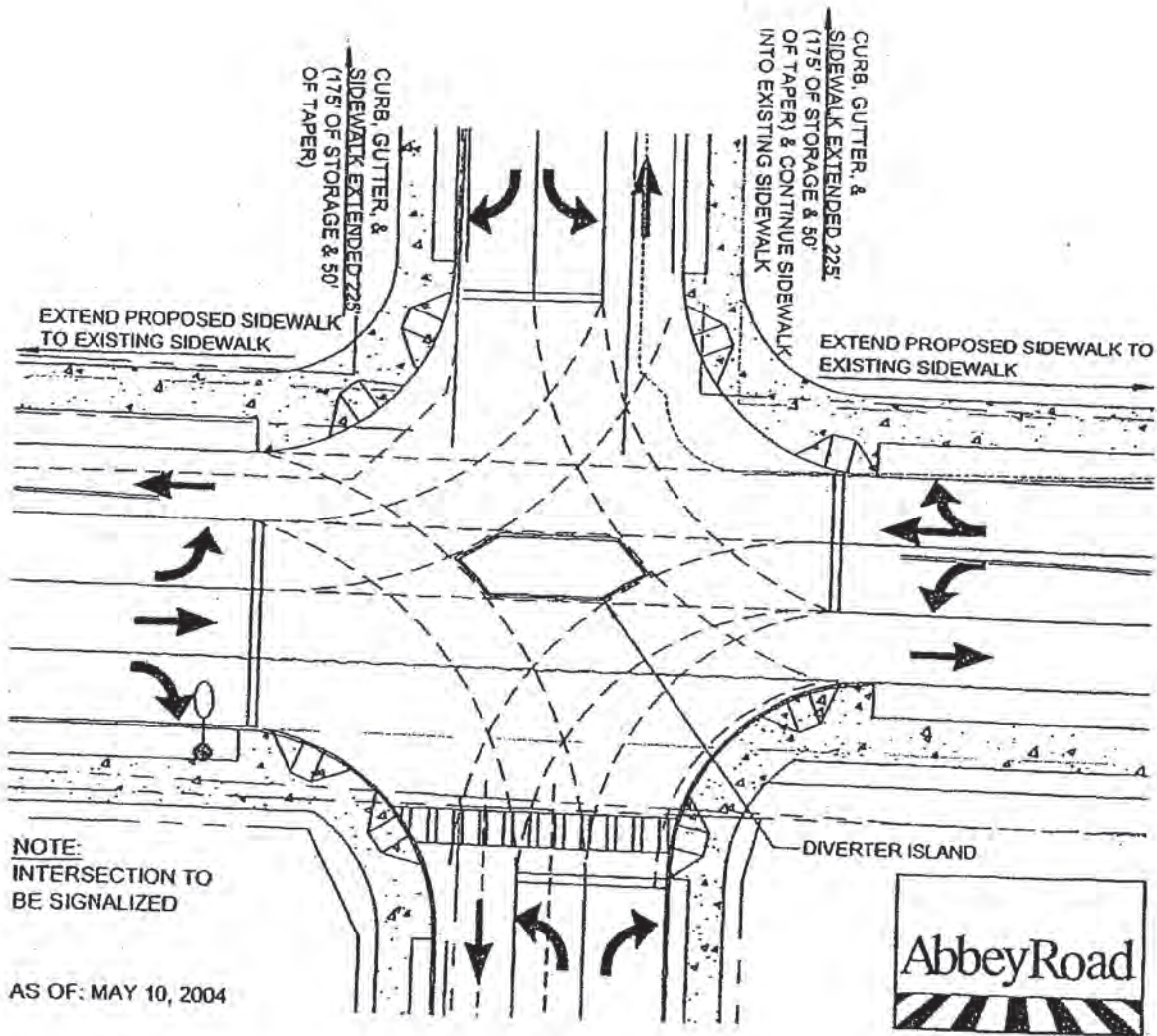


EXHIBIT G-8

TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT

TRAFFIC CALMING PLANTER
ISLAND DETAIL

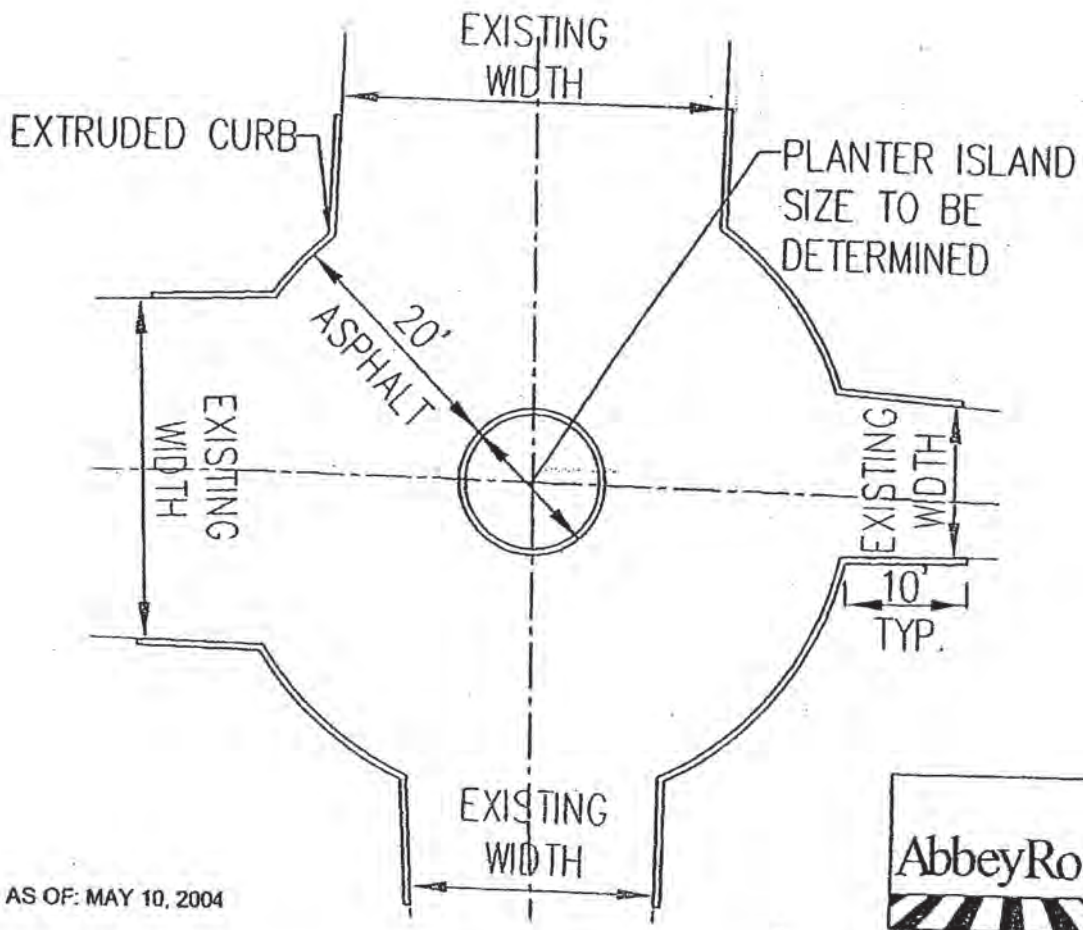


EXHIBIT H

**TO CONCOMITANT AGREEMENT
AND
DEVELOPMENT AGREEMENT**

PROCESS IV HEARING EXAMINER DECISION

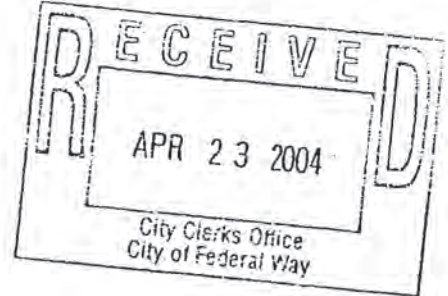


CITY HALL
33530 1st Way South
PO Box 9718

(253) 661-4000
Federal Way, WA 98063-9718

April 23, 2004

Gil Hulsmann
Abbey Road Group, LLC
PO Box 207
Puyallup, WA 98372



RE: PROCESS IV REQUEST ENVIRONMENTALLY SENSITIVE AREA INTRUSIONS
CHRISTIAN FAITH CENTER, FWHE# 04-03, FW# 02-1-2271-00-UP

Dear Appellant:

Enclosed please find the Report and Decision of the City of Federal Way Hearing Examiner relating to the above-entitled case.

Very truly yours,


STEPHEN K. CAUSSEAU, JR.
HEARING EXAMINER

SKC/klb

cc: All parties of record
City of Federal Way

*C: Smith - CD
Kauk - JW*



CITY OF FEDERAL WAY

OFFICE OF THE HEARING EXAMINER

IN THE MATTER OF:

PROCESS IV REQUEST ENVIRONMENTALLY SENSITIVE AREA INTRUSIONS

CHRISTIAN FAITH CENTER.

) FWHE# 04-03
) FW# 02-1-2271-00-UP
)
)
)

I. SUMMARY OF APPLICATION

The applicant is requesting to: 1) fill a "Category III" wetland and its buffer; 2) mitigate for the filled wetland and buffer by creating wetland and additional buffer area in and adjacent to a "Category II" wetland on the site; 3) displace a portion of a wetland/stream buffer to accommodate an access road; and 4) intrude into wetland buffers for street improvements, including pavement widening, retaining wall, and extending storm pipes and stream culverts.

II. PROCEDURAL INFORMATION

Hearing Date: April 20, 2004
Decision Date: April 23, 2004

At the hearing the following presented testimony and evidence:

- 1. Lori Michaelson, Senior Planner, City of Federal Way
2. Gil Hulsman, 923 Shaw Road, Suite A, Puyallup, WA 98372
3. Garet Monger, 518 N. 59th, Seattle, WA 98103
4. Marie Adair, 28811 - 19th Ave. S., Federal Way, WA 98003

At the hearing the following exhibits were admitted as part of the official record of these proceedings:

- 1. Staff Report with all attachments
1-E. Addendum to Environmental Impact Statement (1E) (4/16/04)
1-F. Letters from Public (Beginning w/Derek Dexheimen) (1F) (4/16/04)

2. Power Point Presentation (Hard Copy) – Process IV Public Hearing
3. Christian Faith Centers – Wetland Areas Chart
4. Statement from Virginia Marquart
5. Marie Adair Statement

III. FINDINGS

1. The Hearing Examiner has heard testimony, admitted documentary evidence into the record, and taken this matter under advisement.
2. The Community Development Staff Report sets forth general findings, applicable policies and provisions in this matter and is hereby marked as Exhibit "1" and incorporated in its entirety by this reference.
3. All appropriate notices were delivered in accordance with the requirements of the Federal Way City Code (FWCC).
4. The applicant has a possessory ownership interest in a generally rectangular, 46.58-acre parcel of unimproved, mostly forested property located east of Pacific Highway South and west of Interstate 5 between South 336th Street and South 341st Place within the City of Federal Way. The applicant has submitted requests for approval of a comprehensive plan amendment, zone reclassification, development agreement, and development plan which, if approved, would allow development of the site into a 218,500 square-foot church, 104,480 square-foot private school, and associated parking, playfields, and landscaping. The decision to approve or deny the above requests is within the jurisdiction of the Federal Way City Council which will hold a public hearing prior to making such determination.
5. To construct the project as proposed, the applicant must also obtain Process IV approval to allow the applicant to fill a wetland and intrude into wetland/stream buffers. Specifically, the applicant requests authority to fill a Category III wetland and its buffer; create additional wetlands and buffers in and adjacent to an on-site Category II wetland; displace a portion of a wetland/stream buffer to accommodate an access road; and potentially intrude into wetland buffers to make street improvements which could include pavement widening, a retaining wall, and the extension of storm pipes and stream culverts.
6. A north/south trending ridge divides the parcel into two drainage subbasins within the Hylebos Creek Basin. A tributary to the west branch of Hylebos Creek flows

from north to south across the west side of the property, and a tributary to the east branch of Hylebos Creek flows across the east side of the parcel from north to south. The Federal Way City Code (FWCC) defines both tributaries as major streams.

7. Three wetlands exist on the site. Wetland "A" measures approximately 4.5 acres, 14,000 square feet of which are located on the site. Wetland "A" is associated with the Hylebos tributary and also serves as an operating, regional storm drainage detention facility known as "Kitts Corner Pond", designed and maintained by the City. Pursuant to a 1996 Settlement Agreement between the City and a previous property owner, the applicant will discharge stormwater runoff from the western portion of the site into the Kitts Corner Pond (Wetland "A"). However, the primary wetland hydrology is provided by the tributary which flows into Wetland "A" through an 18-inch diameter storm pipe and a pair of 42-inch diameter stream culverts beneath South 336th Street.
8. Pursuant to the Settlement Agreement, the City has provided a permanent buffer width of 100 feet around Wetland "A" with the exception of the northern portion of the boundary adjacent to South 336th Street which ranges in width from approximately 40 feet to 50 feet. The proposed site plan shows an access extending east into the site from Pacific Highway South through the southern portion of the wetland buffer as anticipated by the Settlement Agreement which requires City staff to support such an extension. However, the agreement requires Process IV review and hearing examiner approval. Thus, development of the project will not impact Wetland "A", but will impact the buffer along the south portion of the wetland and could impact a portion of the buffer along the north portion of the wetland.
9. As previously found, a Hylebos Creek tributary flows into the wetland from beneath South 336th Street, exits the site through an adjustable gate spillway in the southwest corner of the pond, and then flows into a storm pipe which passes beneath Pacific Highway South. The tributary has no defined stream channel within Wetland "A" and dries up during the late summer.
10. Wetland "C" consists of a 3,762 square-foot Category III Palustrine scrub-shrub wetland located near the center of the parcel at the proposed location of the school auditorium/sanctuary building. The applicant proposes to fill both the wetland and its required 25-foot wide buffer. Wetland "C" has no hydrological connection to any other water body as its hydrology is provided by a high ground water table. The

wetland has low habitat value due to its size, lack of plant diversity, isolation, and lack of open water during the summer months.

11. Wetland "B", located along the eastern property line, consists of a linear, riparian wetland that is associated with and straddles the eastern Hylebos Creek tributary. The wetland meets the definition of a Category II Palustrine Forested wetland which requires a 100-foot wide buffer. The Hylebos tributary provides hydrology for the wetland as it flows into said wetland through two culverts beneath South 336th Street. Sewer line construction previously disturbed the wetland and buffer. The site plan shows the wetland surrounded by a 100-foot wide buffer with the exception of the north portion adjacent to South 336th Street.
12. To build the project as proposed and make a reasonable use of the property, the applicant must fill Wetland "C" and its buffer. To mitigate therefor, the applicant proposes to intrude into Wetland "B", its buffer, and the tributary buffer to create 5,200 square feet of Category II wetland which will include grading. The applicant must also displace 16,305 square feet of Wetland "A" buffer to facilitate construction of the access road from Pacific Highway South. To mitigate for the displacement, the applicant proposes to create 20,083 square feet of wetland buffer along the eastern border of the existing buffer. The applicant may need to displace an unknown amount of buffers for both Wetlands "A" and "B" adjacent to South 336th Street. The exact area of displacement (if any) will not be known until the City Council makes its determination regarding approval of the project and road improvements. Maximum displacement will include 11,690 square feet of Wetland "A" buffer and 6,794 square feet of Wetland "B" buffer. To mitigate, the applicant will add 21,480 square feet of wetland buffer to the northeast buffer of Wetland "A" and 17,165 square feet of buffer along the western buffer of Wetland "B" (See Exhibit 3).
13. Section 22-1358 FWCC sets forth the criteria an applicant must meet prior to constructing improvements and making land surface modifications within regulated wetlands. Section 22-1359 FWCC sets forth criteria for constructing improvements and land surface modifications within regulated wetland buffers. The first five criteria set forth in each section are identical, but modifications within wetlands have four additional criteria. As previously found, the applicant must fill Wetland "C" and its buffer. Prior to obtaining approval to do so, the applicant must establish that the request satisfies all criteria set forth in Sections 22-1358(d) and 22-1359(f) FWCC. Findings on each criteria are hereby made as follows:

- A. Filling the wetland will not adversely affect water quality. The wetland has no hydrologic connection with other wetlands or stream corridors. A code-required final erosion and sedimentation control plan will address adverse water quality impacts related to grading and filling activities. The created wetland and buffer along the eastern tributary will provide much greater functions relating to water quality, hydrology, and wildlife habitat than currently provided by Wetland "C".
- B. Filling the wetland and buffer will not adversely affect the quality of wildlife habitat. Wetland "C" has low habitat value due to its small size, hydrologic isolation, lack of plant diversity, and lack of open water during the summer. The compensatory mitigation areas along Wetland "B" will provide habitat values equal to or greater than retention of Wetland "C". No endangered or protected animals inhabit the site.
- C. Filling the wetland and buffer will not adversely affect drainage or storm water retention capabilities. The applicant will excavate the mitigation area to ensure a volume of surface water detention and retention equal to Wetland "C".
- D. Filling will not lead to unstable earth conditions or create erosion hazards. Wetland "C" is not located near any geologically hazardous areas, and an erosion and sedimentation control plan which the City must approve will address erosion from filling and grading.
- E. Filling the wetland will not be materially detrimental to any other property in the area nor to the City as a whole. As previously found, the applicant will create 5,200 square feet of wetland as compared to the 3,762 square feet filled.
- F. As previously found, the filling of Wetland "C" will result in no net loss of wetland area, function, or value.
- G. The project is in the best interest of the public health, safety, or welfare. As previously found, creating additional wetland and buffer within the valuable stream/wetland area along the east property line results in greater resource protection and will allow more efficient use of land.
- H. The applicant has demonstrated sufficient scientific expertise and

supervisory capability to carry out the project. The applicant's wetland biologist is a recognized expert with over 10 years experience in designing wetland mitigation plans.

- I. The applicant is committed to monitoring the project and making corrections if the project fails to meet projected goals. The applicant has provided a mitigation and monitoring plan for a five-year period and has also designed the storm drainage system to allow further discharge into the wetlands to restore hydrology if such is necessary.
 - J. The City has approved the applicant's conceptual mitigation plan, and the replacement and enhancement wetland and buffer ratios satisfy the criteria set forth in Section 22-1358(e)(3) FWCC.
15. Prior to obtaining approval to intrude into Wetland "B" and its buffer and the Stream "B" buffer to provide compensatory wetland and buffer for filling Wetland "C" and its buffer, the applicant must also establish that the request satisfies the criteria set forth in Sections 22-1358 and 22-1359 FWCC. Findings on each criteria are hereby made as follows:
- A. Intrusion to create additional wetlands will not adversely affect water quality. The created wetland area will have a greater diversity of wetland plants than Wetland "C", and such plants will provide water quality by removing nutrients and toxins by filtration and uptake in plant tissue. Mitigation and monitoring will ensure no adverse impacts to water quality.
 - B. The intrusion will not adversely affect the existing quality of the wetland's or buffer's wildlife habitat. Habitat potential in the mitigation area of Wetland "B" is greater than the wetland and buffer of Wetland "C". The enhanced native scrub-shrub plant community and native forest habitat will increase the vegetation and plant diversity thereby improving near stream habitat opportunities.
 - C. The intrusion will not adversely affect drainage or stormwater retention capabilities. The applicant has designed the created wetland to replicate the stormwater retention capacity of Wetland "C". The applicant will excavate the toe of an existing slope and create a volume of surface water detention and retention comparable to or greater than the filled wetland. Creek flood waters, as well as stormwater runoff, will provide a source of hydrology to the

new wetland. Project stormwater is infiltrated into the ground will move down slope through the wetland buffer into the created wetland.

- D. The intrusion will not lead to unstable earth conditions nor create erosion hazards. The creation area consists of a relatively level flood plain adjacent to the Hylebos tributary. Excavation depth will range from one to three feet, and water velocities, even during winter flooding periods, are relatively slow. The dredging will create no steep slopes or other topography subject to erosion. Extensive revegetation will bind the soil and control erosion.
 - E. The intrusion will not be materially detrimental to any other property in the area nor to the City as a whole. The project will not affect off-site properties or public or private open space areas.
 - F. As previously found, the intrusion will result in no net loss of wetland area, function, or value. The applicant is creating more wetland than it is filling in accordance with the requirements of the FWCC. The applicant is also establishing substantially more wetland buffer than destroyed.
 - G. The project is in the best interest of the public health, safety, or welfare. As previously found, trading a small, isolated wetland for an expanded, connected, wetland system results in greater resource protection and more efficient use of land.
 - H. As previously found, the applicant has demonstrated sufficient scientific expertise and supervisory capability to fulfill the project.
16. Prior to eliminating a portion of Wetland "A"'s south buffer to allow construction of the access road from Pacific Highway South, the applicant must establish that the request satisfies the criteria set forth in Section 22-1359(f) FWCC, addressing wetland buffers, and Section 22-1312(c) FWCC, addressing intrusion into setbacks for streams. Said Sections set forth the same criteria, but Section 22-1312 FWCC has one additional criteria. Findings on each criteria are hereby made as follows:
- A. Locating the access road within the Wetland "A" buffer will not adversely affect water quality. As previously found, Wetland "A", located mostly west and northwest of the site, is known as the "Kitts Corner Pond" and provides a regional storm drainage facility. The applicant's conceptual storm drainage plan (Exhibit L) shows surface water collected from the proposed access

road and directed into a storm water treatment system to the south of said road. The water then discharges into Wetland "A" following cleansing.

- B. Construction of the road in the buffer will not adversely affect the existing quality of the wetland's or buffer's wildlife habitat. The buffers on the west and south sides of Wetland "A" are presently in poor condition and consist of earthen berms, gravel roadways, and sparse vegetation. However, the eastern buffer consists of forest and is therefore in good condition. The applicant proposes to remove 16,305 square feet of a previously disturbed buffer area and replace it with property adjacent to the high quality, forested buffer on the east side of the wetland. The access road is proposed within an existing access easement and was recognized in the Settlement Agreement.
- C. Construction of the road will not adversely affect drainage or stormwater retention capabilities. Construction in accordance with a final storm drainage grading and erosion control plan will assure no adverse impacts to the drainage or stormwater retention capabilities of the buffer.
- D. Construction will not lead to unstable earth conditions nor create erosion hazards. The road area contains no geologically hazardous areas, and construction in accordance with approved plans will ensure that no unstable earth conditions or erosion hazards develop.
- E. Construction will not be materially detrimental to any other property in the area of the subject property nor to the City as a whole, including loss of open space. Replacement of a disturbed buffer with forested property will benefit the City and properties in the area. The additional buffer will preserve and protect sensitive areas from future land modifications and encroachments by people and animals.
- F. Section 22-1312(c)(6) requires the applicant to show that the intrusion is necessary for reasonable development of the subject property. The road will provide access to the site in accordance with an existing easement recognized by the Settlement Agreement. To build the project, the applicant must have an access onto Pacific Highway South. Therefore, the applicant cannot proceed with reasonable development without the road.

17. As previously found, depending on the City Council's requirements for street

improvements on South 336th Street, the applicant may need to intrude into those portions of the buffers of both Wetlands "A" and "B" located within the right-of-way of said road. If the City Council requires full street improvements within the wetland buffer areas, the applicant will need to disturb 11,690 square feet of Wetland "A" buffer and 6,794 square feet of Wetland "B" buffer. The applicant proposes to create 21,480 square feet of buffer for Wetland "A" and 17,165 square feet of buffer for Wetland "B". Thus, the applicant will replace 18,484 square feet of low quality wetland buffer with 38,645 square feet of high quality buffer. Prior to intruding into said wetland buffers to make street improvements, the applicant must establish that the requests satisfies the criteria set forth in Sections 22-1312 and 22-1359 FWCC.

The request satisfies said criteria as the applicant must construct improvements to include pavement widening, retaining walls, and extension of storm drainage pipes.

The existing location and configuration of South 336th Street plus the required street improvements dictate the street and storm drainage system design for the overall project. All improvements will occur within the right-of-way, and the retaining walls will limit buffer displacement. Both buffers along South 336th Street have been previously disturbed by construction of existing street and drainage improvements but have revegetated over time. As previously noted, a sewer line was constructed within Wetland "B". The wetland buffers within the right-of-way provide no significant habitat value, but must be invaded to provide access to the site. The applicant has also demonstrated that the stream cannot cross beneath South 336th Street in an open condition, and extending the culvert by three feet will have little, discernable effect on stream function or habitat. The existing culvert meets the 100-year storm design standard as will the extensions. The culvert design does not preclude fish passage, although fish do not inhabit either tributary, and are not located immediately down stream.

18. In summary, Wetland "A" will not be disturbed, but will have its buffer area expanded from the present 192,327 square feet to a possible 205,895 square feet, and will also have 3,598 square feet of wetland enhancement. Wetland "C" will be filled and eliminated. Wetland "B" will increase in size by 5,200 square feet and will have its buffer area increased from the present 193,085 square feet to 220,089 square feet.

Overall, wetland size will increase from the present 242,971 square feet to 244,410 square feet. Wetland buffers will increase from the present 393,838 square feet to 425,985 square feet (Exhibit 3). Therefore, development of the site as proposed will result in no net loss in wetlands and/or wetland buffers.

19. Prior to obtaining Process IV review approval, the applicant must establish that the request satisfies the criteria set forth in Section 22-445(c) FWCC. Findings on each

criteria are hereby made as follows:

- A. All requests are consistent with the Federal Way Comprehensive Plan. Applicable goals and policies set forth in the Plan include Policy CA4 which approves a tradeoff of small, isolated wetlands in exchange for a larger, connected wetland system which can achieve greater resource protection and reduce isolation and fragmentation of habitat. The applicant proposes a development which eliminates a "small, isolated wetland" in exchange for increasing the size of a more valuable, larger, connected wetland system. Policy NEG7 of the Comprehensive Plan encourages the protection and enhancement of the functions and values of the City's wetlands, and the applicant's mitigation plans do so. As previously found, the project meets the City's objective of no overall net loss of wetland functions or values in accordance with Policy NEP43. The mitigation site complies with Policy NEP50 as it contributes to an existing wetland system and increases buffers for existing wetlands.
 - B. The project is consistent with all applicable provisions and laws of the FWCC assuming compliance with conditions of approval and City Council approval for the overall development.
 - C. The project is consistent with the public health, safety, and welfare.
 - D. The City Council will determine whether the streets and utilities in the area are adequate to serve the anticipated demand from the proposal. The wetland mitigation does not generate demand on streets and utilities. Approval of the Process IV request will authorize street frontage improvements within the South 336th Street right-of-way and construction of an access road from Pacific Highway South.
 - E. The City Council will determine whether the proposed accesses to the parcel are at their optimal location and configuration. Again, the Process IV approval authorizes street improvements and construction as set forth above.
20. The City included a number of comment letters which raised generalized objections regarding the filling of wetlands and intrusion into wetland buffers. However, none of the letters offered expert testimony contradicting the applicant's expert studies and the City's review thereof. The Washington Court of Appeals addressed such

comments in Maranantha Mining v. Pierce County, 59 Wash.App. 795 (1990);

The only opposing evidence was generalized complaints from displeased citizens. Community displeasure cannot be the basis of a permit denial. 59 Wash.App. 795, at 804.

IV. CONCLUSIONS

From the foregoing findings the Hearing Examiner makes the following conclusions:

1. The Hearing Examiner has jurisdiction to consider and decide the issues presented by this request.
2. The applicant has established that the request to fill a Category III wetland and buffer, mitigate for such activities by providing additional wetlands and buffers, displacing a wetland/stream buffer to accommodate an access road, and intrude into wetland buffers to construct street improvements is consistent with applicable criteria set forth in Sections 22-1358, 22-1359, and 22-1312 FWCC. The project also complies with applicable goals and policies of the Federal Way Comprehensive Plan.
3. The project satisfies all criteria set forth in Section 22-445(c) FWCC for Process IV approval. Therefore, Process IV approval should be granted subject to the following conditions:
 1. As required by the Director of Community Development Services, prior to occupancy of any buildings on the site, the applicant shall set aside the wetlands and buffers approved by this decision as Native Growth Protection Tracts (NGPT's). The boundaries of the areas shall be surveyed and shall reflect the expanded buffers shown in a final approved Mitigation and Monitoring Plan, prepared in accordance with Condition #7 below; and shall be in addition to the buffer area for the east side of Wetland "A" as delineated the 1996 Settlement Agreement between the City of Federal Way and the Federal Way Industrial Park. The applicant shall submit the draft documents for the City's review and authorization and the documents shall be recorded as directed by the City.
 2. As required by the Directors of Community Development Services Department and Public Works Department, prior to issuance of any

construction permits, the applicant shall field-flag all identified wetland buffer boundaries in accordance with a final approved Mitigation Plan, prepared in accordance with Condition #7 below; and consistent with the recorded Native Growth Protection Tracts as required by Condition #1 above; and the buffer boundaries shall be reflected on all applicable construction drawings and permits.

3. As required by the Director of Community Development Services, prior to issuance of a building permit, the applicant shall submit for the City's review and approve a plan to provide signage on the site, identifying environmentally sensitive areas and prohibiting human and pet access into such areas. The plan shall include the number, location, and design details, including text, for the proposed signs.
4. Any use of the recreational field adjacent to Wetland "B" for competitive athletic games, such as baseball or soccer, as may be approved by the Director of Community Development Services, must provide fencing adjacent to the sports field along the west Wetland "B" buffer boundary, delineated pursuant to Condition #1 above. Prior to initiation of any such activities, the applicant shall establish the fencing pursuant to the City's review and approval of a fencing plan and design details as provided by the applicant, and such fencing shall be designed to allow for the passage of small animals.
5. As required by the Director of Community Development Services pursuant to FWCC § 22-1358(1)(g) and § 22-1358(3)(4), prior to issuance of construction permits related to any work approved with this application, the applicant shall: (a) provide a cost estimate that covers the complete costs for plant materials, installation, and maintenance, including contingencies, pursuant to the final approved Mitigation Plan; (b) provide a performance and maintenance bond to the City in the amount of 120 percent of the cost estimate; and (c) pay for the services of a qualified professional selected and retained by the City to review monitoring reports, conduct inspections, and make recommendations to the City during monitoring period. Following successful installation of the wetland mitigation work pursuant to the final approved Plan and initial inspection, the performance portion of the bond shall be released and the five-year maintenance portion of the bond shall apply during the five years of monitoring.

6. As required by the Director of Public Works, grading and clearing activities in the Wetland "B" mitigation area (excluding installation of planting and an irrigation system) shall be prohibited between October 1st and April 30th.
7. Prior to issuance of any construction permits, the applicant shall submit a final Mitigation and Monitoring Plan, for the City's review and approval, that addresses all outstanding requirements as identified in the April 8, 2004, memorandum from Sheldon and Associates, Inc.
8. The Process IV approval does not take effect unless or until the City Council approves the Comprehensive Plan Amendment, Rezone, Development Agreement, and Development Plan, as separately requested by the applicant.

DECISION:

The request for Process IV approval to allow the filling of Wetland "C", the mitigation for the filled wetland and buffer by the creation of wetland and additional buffer area in an and adjacent to Wetland "B"; the displacement of a portion of a wetland/stream buffer to accommodate an access road; and the intrusion into wetland buffers for street improvements is hereby granted subject to the conditions contained in the conclusions above.

DATED THIS 23rd DAY OF April, 2004.


STEPHEN K. CAUSSEAU, JR.
Hearing Examiner

TRANSMITTED THIS 23rd DAY OF April, 2004, to the following:

APPLICANT/AGENT: Gil Hulsmann
Abbey Road Group, LLC
PO Box 207
Puyallup, WA 98372

OWNER(S): Christian Faith Center
PO Box 9860
Seattle, WA 98198

Bob Loomis
2101 S. 324th St., SP 205B
Federal Way, WA 98003

Carl Jones
Belmor Park
2101 S 324th St., SP333
Federal Way, WA 98003

R.D. Pearson
2101 S. 324th St., #303
Federal Way, WA 98003

Jack Tylare
2101 S. 324th St., #10
Federal Way, WA 98003

Barry Turnbull
33355 20 S.
Federal Way, WA 98003

Shirley Fulbraa
33357 20 S.
Federal Way, WA 98003

Phyllis L. Bowman
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Federal Way, WA 98003

Marie Adair
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Juliet Sykes
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Dr. Patricia Mail
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Virginia Marquart
29009 22nd Ave. S.
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Federal Way, WA 98003

Joann Piquette

Ted W. Wilson

302 S. 295th Pl.
Federal Way, WA 98003

Margaret Nelson
32904 4th Ave. SW
Federal Way, WA 98023

City of Federal Way
c/o Chris Green
P.O. Box 9718
Federal Way, WA 98063-9718

824 S. Marine Hills Way
Federal Way, WA 98003

John Kanto
1824 S. 344th St.
Federal Way, WA 98003

PROCESS IV

Rights to Appeal

Decisions of the hearing Examiner may be appealed by any person who is to receive a copy of that decision under FWCC Section 22-443.

The appeal, in the form of a letter of appeal, must be delivered to the Department of Community Development Services within fourteen (14) calendar days after the issuance of the Hearing Examiner's decision. The letter of appeal must contain:

2. A statement identifying the decision being appealed, along with a copy of the decision;
3. A statement of the alleged errors in the Hearing Examiner's decision, including specific factual finds and conclusions of the Hearing Examiner disputed by the person filing the appeal; and
4. The appellant's name, address, telephone number and fax number, and any other information to facilitate communications with the appellant.

The person filing the appeal shall include, with the letter of appeal, the fee established by the City of the costs of preparing a written transcript of the hearing (or in the

alternative, the appellant may prepare the transcript at his or her sole costs from tapes of the hearing provided by the City). The appeal will not be accepted unless it is accompanied by the required fee and cost (or agreement of the appellant to prepare the transcript).

Appeals from the decision of the Hearing Examiner will be heard by The City Council. The decision of City Council is the final decision of the City.

The action of the City in granting or denying an application under this article may be reviewed pursuant to RCW 36.70C in the King County Superior Court. The Land Use Petition must be filed within twenty-one (21) calendar days after the final land use decision of the City.

EXHIBIT D

STATEMENT OF FACTS AND CONCLUSIONS

1. The applicant has a possessory ownership interest in a generally rectangular parcel of unimproved property located east of Pacific Highway South and west of Interstate 5 (I-5) between South 336th Street and South 341st Place within the City of Federal Way.
2. The subject site currently has a comprehensive plan and zoning designation of Business Park (BP) and the land is presently vacant. Existing zoning and land uses of the surrounding properties in the vicinity include single and multiple family to the north; a mix of residential, commercial, and industrial to the south; commercial to the west, and Interstate 5 and commercial to the east.
3. The applicant has submitted requests for approval of a comprehensive plan amendment and rezone, with an associated development agreement and development plan to allow development of the site into a 218,500 square-foot church, 101,526 square-foot private school, and associated parking, playfields, and accessory uses.
4. The requested Comprehensive Plan Amendment and Rezone is subject to a City Council decision pursuant to *Federal Way City Code* (FWCC) Chapter 22, Article IX, "Process VI Review;" and the requested Development Agreement and Development Plan is subject to City Council decision pursuant to FWCC Chapter 22, Article IX, "Process VI Review," and FWCC Chapter 22, Article XXI, "Development Agreements." The decision to approve or deny the requests is within the jurisdiction of the Federal Way City Council.
5. The City Council held a Public Hearing May 24, 2004 and June 15, 2004, took testimony, admitted evidence into the record, and considered the matter fully.
6. All appropriate procedures were followed in accordance with the requirements of the FWCC and applicable law.
7. All appropriate notices were delivered in accordance with the requirements of the FWCC and applicable law.
8. The Hearing Examiner reviewed and conditionally approved the environmentally sensitive areas requests associated with the application on April 23, 2004. The Hearing Examiner Decision sets forth general findings, applicable policies and provisions in the matter and is hereby incorporated in its entirety, without limitation, by this reference.
9. Pursuant to the State Environmental Policy Act (SEPA), the City issued a Notice of Adoption of Existing Environmental Documents and Issuance of a Determination of Nonsignificance, on the proposed Comprehensive Plan Amendment and Rezone of the site from Business Park (BP) to Multifamily Residential 3600 (RM-3600) on July 4, 2001. The City issued Draft and Final Environmental Impact Statements (EIS) for the development application on November 18, 2003, and March 3, 2004, and EIS Addenda on April 16, 2004 and May 21, 2004. Four public meetings were conducted during the environmental review process for the proposed project. These included an EIS Scoping Meeting on August 27, 2002; Neighborhood Traffic Meeting on May 8, 2003; Draft

Environmental Impact Statement (DEIS) hearing on December 12, 2003; and City Council EIS briefing on March 15, 2004. The Threshold Determination, EIS and addenda, and all environmental documents for the project, are hereby incorporated in their entirety, without limitation, by this reference.

10. The Staff Report sets forth general findings, applicable policies and provisions in the matter and is hereby incorporated in its entirety, without limitation, by this reference.
11. Pursuant to FWCC Section 22-1660, "Purpose," development agreements associated with a comprehensive plan designation and related zoning change may be used at the City Council's discretion, where the project is larger in scope and has potentially larger impacts than normal, or where the City Council may desire to place certain restrictions on the proposal. The intent of a development agreement is not to waive requirements normally associated with a proposed use. A "Concomitant Agreement and Development Agreement", herein called "The Agreement" or "The Development Agreement," has been prepared for the project in order to fully address and mitigate identified impacts associated with the project. The Concomitant Agreement allows for a rezone of the property subject to conditions governing the use of the property. Under the Concomitant Agreement, the allowable use of the property shall be limited to a church, a school, and accessory uses. Pursuant to FWCC Section 22-1662, "Content," the Agreement sets forth the development standards and other provisions that apply to and govern and vest the development, use, and mitigation of the development of the real property for the duration specified in the Agreement, consistent with the applicable City of Federal Way development regulations. The Agreement is accompanied by a Development Plan (*Exhibit B* to the Agreement) as required by FWCC Section 22-1669, and has been prepared in accordance with FWCC Section 22-1664, "Preparation of Development Agreement."
12. Mitigation measures established in the Agreement are based on the FWCC and adopted regulations, policies and procedures; *Federal Way Comprehensive Plan (FWCP)*; the EIS prepared for the project, including the key development and operational assumptions underlying the EIS analysis; and the City's police power authority.
13. Mitigation measures established in the Agreement are proportional to direct, identified impacts of the development and are supported by substantial evidence.
14. The proposed principal uses of the site as a church and school, are allowed uses in the proposed Multifamily Residential (RM) zoning districts, pursuant to FWCC Sections 22-671 and 22-674, subject to all applicable development regulations and standards. Use and development of the site consistent with the FWCC and the Development Agreement will help ensure compatibility of the use with surrounding areas.
15. The project will provide a "front yard" setback from South 336th Street of a minimum 50 feet; with "side" and "rear" yards of 30 feet for the church building; and 50 feet for the school building, ball fields and any playground equipment. This provides an additional 20 feet more of front yard setback from South 336th Street for the church building than would be required by FWCC Sections 22-671 and 22-674, which allows additional landscape screening against South 336th Street and residential zoning districts to the north of the site. In addition, pursuant to code-required parking setbacks and design guidelines, a 15-foot parking lot setback along church portion with landscape buffer will be provided along the south property line adjacent to the residential uses to the south.

16. Consistent with FWCC Sections 22-671 and 22-674, the maximum allowed height of single-story elements of the church building is 35 feet above average building elevation (ABE), with up to three additional feet allowed for articulated cornices, and the maximum second-story height for offices, classrooms, library, and similar uses is 40 feet above ABE. The maximum height of the school building is 40 feet above ABE, with up to three additional feet allowed for articulated cornices. The maximum height of the sanctuary portion of the church, and the gymnasium portion of the school auditorium, is 55 feet ABE.
17. Pursuant to FWCC Section 22-1669, "Development Plan," and FWCC Section 22-395, "Director's Decision", the site and architectural design elements of the project were approved in a March 20, 2004, Director's Design Decision, based on the analysis and findings contained in *Exhibit A* to the decision. Development of the site in accordance with the design decision and other conditions of project approval and required mitigation will ensure incorporation of good design principles and compatibility with surrounding areas. The design decision sets forth general findings, applicable policies, and provisions, and is hereby incorporated in its entirety, without limitation, by this reference.
18. The applicant's preliminary clearing, grading, erosion control, significant tree survey, landscape, and surface water drainage plans have been reviewed and accepted under applicable City of Federal Way adopted codes, policies, and regulations, including FWCC Chapter 21, "Surface Water Management"; FWCC Chapter 22, Article XVII, "Landscaping"; and the *King County Surface Water Design Manual (KCSWDM)* and the City's amendments to the KCSWDM, subject to review of final construction plans prepared in accordance with all applicable codes and development standards; the EIS; Process IV conditions of approval; and mitigation required under the Development Agreement.
19. Surface water detention and water quality treatment facilities will be provided for both the west and east drainage sub-basins on the site, in accordance with all applicable design and development regulations.
20. The Development Agreement establishes a number of mitigation measures that meet or exceed code requirements. This includes the oversight of a Construction Site Erosion and Sediment Control (ESC) Supervisor; a Stormwater Pollution Prevention Plan; a phased construction plan; and seasonal construction limits. Surface water mitigation in the Agreement includes design and construction of the east side stormwater detention pond to meet Level 2 flow control standards; collection and dispersment of roof runoff from the sanctuary roof to adjacent wetland buffer areas; design and construction of surface water treatment facilities for the East and West 1 sub-catchments to include the use of Stormwater Management filter vault systems, with compost medium, that meets or exceeds Resource Stream Protection Standards; and provision of an Integrated Pest Management Plan as described in the *Department of Ecology Stormwater Manual (2001)*, in order to control the use of fertilizers and pesticides. The Agreement also provides for denser vegetated bank cover and larger trees around surface water detention water quality treatment ponds than would otherwise be required by code. Additional vegetated cover will contribute to water quality by decreasing the temperature of surface water runoff from impervious surfaces and standing water in drainage facilities. This will help mitigate stormwater drainage impacts from the development.
21. Perimeter landscape buffers, as specified in the Development Agreement, meet or exceed the applicable standards in FWCC Section 22-1566, "Multifamily Residential, RM." This includes 50 feet of landscaping along South 336th Street; 20 feet along other public rights-of-way and access easements; 15 feet along other property lines associated with the church; and 10 feet along other

property lines associated with the school. These provisions are consistent with the FWCC, and also provide 20 feet of additional landscaping along South 336th Street than required by code. A 50 foot vegetated landscape buffer along South 336th Street will preserve additional native trees and shrubs and preserve a cross-site vegetated corridor linking to on-site wetland and stream buffers and riparian areas along the East Branch Hylebos Creek. In addition to retaining native vegetation and providing habitat opportunity, this corridor will provide water quality functions such as rainwater interception and filtering.

22. The clearing, grading, surface water, and landscaping mitigation provided in the Development Agreement is consistent with goals and policies contained in the FWCP Natural Environment Chapter, including NEG1, NEG2, NEG3, NEG10, NEP1, NEP2, NEP7, NEP 10, NEP18, NEP21, NEP63, and NEP64.
23. Pursuant to FWCC Sections 22-1671, 22-1674, and 22-1378, the required amount of parking for churches and schools is determined on a case-by-case basis, pursuant to a parking demand analysis. Based on the City's review of the applicant's Traffic Management Plan (TMP), the Development Agreement specifies a minimum of 1,406 parking stalls and a maximum of 1,540 stalls on the site to serve anticipated parking demand for ordinary operation of the site. The Agreement also requires the applicant to prepare and submit an overflow parking plan for review and approval to the Public Works Director prior to special events to manage overflow parking using resources such as transit, shuttle service, and traffic control such as flaggers and police officers. The Agreement establishes the parking setbacks from property lines, consistent with FWCC Sections 22-671 and 22-674.
24. Lakehaven Utility District has provided Certificates of Water and Sewer Availability for the property, and will provide these services pursuant to developer extension agreements between the applicant and District. Fire and emergency medical services will be provided by the Federal Way Fire Department. A City-operated regional storm drainage detention pond located in the northwest portion of the site has been determined to have adequate capacity to accommodate site drainage from the westerly sub-basin on the property.
25. Staff has reviewed and analyzed transportation related matters. The Staff Report sets forth general findings, applicable policies, and provisions related to the matter, and is hereby incorporated in its entirety, without limitation, by this reference.
26. The project site has frontage on the existing rights-of-way of South 336th Street, SR 99 (Pacific Highway South), South 341st Place, and the planned extension of 20th Avenue South, as shown in FWCP Map III-5. Pursuant to FWCC Section 22-1474(a), frontage improvements are required for these roadways.
27. South 336th Street is classified as a minor arterial, as shown in FWCP Map III-5. FWCP Map III-6 classifies South 336th Street as a Type K street. FWCP Map III-19 was revised to relocate the segment of a bicycle route on South 336th Street between 13th Place South and 20th Avenue South to South 330th Street. Therefore, a Type K street is no longer applicable to South 336th Street west of 20th Avenue South; a Type M street is now the appropriate standard. Existing improvements on the frontage consist of 36 to 54 feet of pavement with intermittent curb, gutter, and sidewalk on the north side only. Existing right-of-way width varies from 60 to 100 feet. The applicant will dedicate five feet of right-of-way on the west 400 feet of frontage only and construct the required half-street improvements on the entire frontage. Modifications approved by the Director of Public Works may be made pursuant to FWCC Section 22-1477, in order to minimize impacts to wetlands and wetland buffers.

28. SR 99 (Pacific Highway South) is classified as a principal arterial, as shown in FWCP Map III-5. FWCP Map III-6 classifies SR 99 as a Type A street. SR 99 is currently under construction to provide full standard improvements, and all necessary right-of-way has been acquired.
29. Twentieth Avenue South is classified as a minor collector, as shown in FWCP Map III-5. FWCP Map III-6 classifies 20th Avenue South as a Type R street. As a new street through the site, the applicant will dedicate all 66 feet of right-of-way and construct full street improvements.
30. South 341st Place is classified as a minor collector, as shown in FWCP Map III-5. FWCP Map III-6 classifies South 341st Place as a Type R street. Existing improvements consist of a 36-foot street with curbs and gutters, and five-foot sidewalks in a 60-foot right-of-way. The applicant will dedicate an additional three feet of right-of-way. Pursuant to FWCC Section 22-1477, the requirement for street frontage improvements on South 341st Place are waived because the improvements are already in place.
31. Pursuant to FWCC Section 22-1474(b), the City may require up to 300 square feet of right-of-way dedication per average daily trip generated. According to the EIS, average daily trip generation would exceed 2688 trips, thus allowing the City to require at a minimum 806,486 square feet of right-of-way dedication. Approximately 108,290 square feet of right-of-way dedication would be required to meet full standards. Thus, the right-of-way requirements are proportionate with the level of impact.
32. Pursuant to FWCC Section 22-1542, two-lane driveways shall be 30 feet wide, and three-lane driveways shall be 40 feet wide, unless design vehicles (the largest vehicle that would reasonably be expected to use the driveway, and therefore the one to which the driveway will be designed) require larger widths. The EIS analyzed all driveways as two-lane except for the northerly of the four driveways onto 20th Avenue South, and the driveway onto South 336th Street, which were assumed to be three-lane driveways.
33. Pursuant to FWCC Section 22-1543(a), South 336th Street has an access classification of four, which allows access points with spacing of 150 feet measured centerline-to-centerline. FWCC Section 22-1543(c) limits access to one per 330 feet of frontage. South 336th Street has approximately 2150 feet of frontage, thus six access points could be allowed. The site plan for the project shows one access approximately 572 feet west of 20th Avenue South. A single-family residential driveway is located opposite this proposed driveway, the driveway to the Ridgecrest Motel is located approximately 100 feet to the west, and a driveway to a multi-family residential complex is located 230 feet to the east. The spacing standard does not apply to single-family residential uses. If the driveway were to be relocated to the east, it would worsen the intersection sight distance for traffic turning left from the driveway onto westbound South 336th Street. If the driveway were relocated to the west, it would infringe upon wetland buffer. The Ridgecrest Motel consists of eight units. Based on ITE *Trip Generation*, 6th edition, the motel is estimated to generate four trips the morning, evening, and Saturday peak hours, and three trips during the Sunday peak hour; therefore, although this access does not meet spacing standards, it has a low probability of creating a significant safety issue. City staff will monitor.
34. Pursuant to FWCC Section 22-1543(a), SR 99 has an access classification of one, which, due to its status as a state highway, must meet the Washington State Department of Transportation (WSDOT) standard of 250 feet. Left-turn in access would best be allowed at a spacing of 330 feet, and full access is permitted only at signalized intersections. However, FWCC Section 22-1543(c) limits

- access to one per 330 feet of frontage. The site has approximately 534 feet of frontage; therefore, only one access point would be permitted. The project proposes to provide a right-in/right-out access 749 feet south of South 336th Street, which would be shared with Pacifica Plaza. This location has no other access within 250 feet. Therefore, this access meets driveway spacing standards.
35. Pursuant to FWCC Section 22-1543(b), the access spacing standard for 20th Avenue South would be 150 feet. Each of the proposed driveways meets this standard. However, FWCC Section 22-1543(c) limits access to one per 330 feet of frontage. Twentieth Avenue South has 1662 feet of frontage, thus five access points could be allowed, whereas four are proposed. Therefore, this standard is met.
 36. Pursuant to FWCC Section 22-1543(b), the access spacing standard for South 341st Place would be 150 feet. FWCC Section 22-1543(c) limits access to one per 330 feet of frontage. No access points are proposed onto South 341st Place. However, the creation of the intersection of 20th Avenue South and South 341st Place creates access spacing issues with an existing driveway at the intersection of 21st Avenue South and South 341st Place. As part of engineering plan review, the applicant will provide plans that provide adequate intersection sight distance, geometrics, and traffic control measures that provide for safe and efficient operation of the intersection consistent with FWCC and adopted standards.
 37. Pursuant to TIA Guidelines item VI.D.4.a, the City uses *Highway Research Record 211* to determine when left-turn lanes are warranted at unsignalized intersections. A left-turn lane is warranted when certain thresholds involving travel speeds, left-turn volumes, through volumes in the same direction as the subject left-turn, and opposing traffic volumes are exceeded.
 38. Based on the volumes in the traffic analysis for the EIS, this warrant is met at the driveway on westbound South 336th Street during the morning, afternoon, and evening peak hours. Therefore, the applicant will provide a westbound left-turn lane at the site access on South 336th Street.
 39. Based on the volumes in the traffic analysis for the EIS, left-turn lane warrants are met at the north driveway on northbound 20th Avenue South during the morning, and Sunday between service peaks; at the north central driveway on southbound 20th Avenue South during the morning, afternoon, Sunday between service, and Sunday after service peaks; at the south central driveway on northbound 20th Avenue South during the morning, and Sunday between service peaks; at the south central driveway on southbound 20th Avenue South during the Sunday between service peak; at the south driveway on southbound 20th Avenue South during the Sunday between service and after service peaks; and at the south driveway on northbound 20th Avenue South during the Sunday between service peak. Since left-turn lanes are warranted at each driveway, the applicant will stripe 20th Avenue South to provide a two-way left-turn lane throughout the site.
 40. The proposed schedule of activities contained in the Traffic Management Plan (TMP), required pursuant to FWCC Section 22-671, was analyzed in the environmental review. Pursuant to FWCP Policies TP5, TP45, and TP62, the following restrictions on the scheduling of activities will be placed on the development in order to reduce traffic impacts: school classes will be completed by 3:30 pm; Sunday services will be separated by at least 90 minutes; evening services will be scheduled to start no earlier than 6:30 pm; Dominion College will have no classes scheduled between noon and 6:30 pm; and special events will be reviewed on a case-by-case basis pursuant to the TMP and should be scheduled to not add trips during peak hours of other uses, or conversely, other uses should be canceled to accommodate the special events. Should a modification of this

schedule of activities, which was submitted for review in the EIS, be required, the Agreement specifies the applicable code process to use.

41. The intersection of SR 99 at South 312th Street would fail the adopted Level of Service (LOS) standards in 2007 with or without Christian Faith Center (CFC). This intersection was originally included in the study area based on a 10 evening peak hour trip threshold in the City's *Guidelines for the Preparation of Transportation Impact Analyses*. As a result of the initial analysis, CFC modified their proposed hours of operation to reduce evening peak hour trip generation. As a result, the project now impacts this intersection by eight evening peak hour trips, less than the 10-trip threshold. Therefore, no mitigation is required at this intersection.
42. Pursuant to the methodology analyzed in the EIS, the intersection of South 320th Street and 23rd Avenue South fails the adopted LOS standard during the evening peak hour in 2007, with or without the project, and fails as a result of the project during the Sunday peak. Staff considered other methodologies for determining failure of the adopted LOS standard without violating the adopted policy. In practice, City staff has administered the policy as outlined in the TIA guidelines as the worst of two tests. Table 2 defines a volume/capacity ratio test as X_c (as defined in the *Highway Capacity Manual*) must be less than 1.000. However, item V.B. in the TIA Guidelines specifies that no movement shall have a volume/capacity ratio greater than 1.000. It is this latter standard upon which the EIS identified the LOS failure. Using X_c , the volume /capacity ratio is 0.91 during the 2007 evening peak hour and 0.94 during the Sunday peak hour. Given that using X_c is consistent with FWCP Policy TP16, and the high cost to mitigate relative to the impact, no mitigation will be required at this intersection.
43. The intersection of South 336th Street at 1st Way South would fail the LOS standards during the evening peak hour in 2007 with or without the project. The proposed mitigation would provide a protected right turn overlap phase for westbound traffic during the southbound left-turn phase. This is a minor revision to the signal design and will be incorporated into the capital project at this location, which is scheduled to be in design in 2004. No mitigation will be required at this intersection beyond pro-rata share contributions described in the Agreement.
44. The intersection of 16th Avenue South at South 341st Place would fail the LOS standard during all peak hours analyzed as a result of the project. The project would add 426 trips during the morning peak hour, 344 trips during the afternoon peak hour, 99 trips during the evening peak hour, and 820 trips during the Sunday peak hour. Because of its proximity to the signalized intersection of 16th Avenue South and SR 99, it is impractical to signalize this intersection to resolve the LOS failure.
45. The EIS considered three alternatives to resolve the LOS failure at 16th Avenue South and South 341st Place. One assumes that the capacity restriction will resolve itself by drivers rerouting to avoid making the left-turn from westbound South 341st Place to southbound 16th Avenue South, by rerouting to South 336th Street and SR 99 when leaving the site, called the "Capacity Constrained Distribution" in the EIS. The second is to provide a connection between South 341st Place and South 344th Street, and use planned signalized intersections on South 344th Street at 16th Avenue South and SR 99 to access these roadways. The third alternative considered is to prohibit westbound left-turns from South 341st Place to southbound 16th Avenue South and accommodate U-turns by constructing a roundabout at the intersection of SR 99 and 16th Avenue South. Based on staff analysis, alternatives one and three are not recommended.
46. The "Capacity Constrained Distribution" assumes that due to significant delays encountered when attempting to make a westbound left-turn from S 341st Place to 16th Avenue S, drivers would

become frustrated and learn to use alternate routes. The EIS analysis assumed that most of these trips would leave the site to the north onto S 336th Street, and most would head west on S 336th Street to SR 99 and turn left to 16th Avenue S or continue straight on SR 99. Although no capacity improvements appear warranted as a result of this assignment, staff has significant concerns about the safety of the 16th Avenue S / S 341st Place intersection under this scenario. It has been the City's experience that unsignalized intersections operating near capacity have a higher than average collision rate. This is due primarily to increased driver frustration, leading to drivers choosing gaps in opposing traffic that are inadequate to complete the maneuver safely. Therefore, this alternative is not recommended.

47. The roundabout alternative would provide adequate levels of service. In order to accommodate planned traffic volumes, it would have a 3-lane roundabout with an inscribed diameter of 200 feet. As SR 99 is a state highway, any intersection modifications would have to be approved by WSDOT. To date, WSDOT has not approved any three-lane roundabouts on the state highway system, and its historical reluctance to approve 2-lane roundabouts casts doubt as to whether this would be a viable alternative at this time. In addition, a roundabout would need right-of-way on both sides of SR 99, impacting developed properties on the east side of SR 99. Therefore, this alternative is not recommended.
48. Providing a connection between South 341st Place and South 344th Street reroutes traffic around the intersection of 16th Avenue South and South 341st Place, and takes advantage of a project planned by the City to construct traffic signals on South 344th Street at 16th Avenue South and at SR 99.
49. Potential locations to provide this connection between South 341st Place and South 344th Street are 21st Avenue South and 18th Avenue South. Due to the presence of wetlands, three different alignments for 21st Avenue South were considered in the EIS. An alignment along the existing right-of-way would impact wetlands and result in two stream crossings; an alignment to the east would cross the wetland at its narrowest width, but would still impact wetlands and result in two stream crossings; and an alignment to the west would avoid impacting the stream and wetlands, but would require right-of-way acquisition from the truck parking lot.
50. Eighteenth Avenue South has continuous right-of-way, but is not a through street due to an existing temporary berm. Eighteenth Avenue South provides a preferred alternative to 21st Avenue South due to the wetlands in the vicinity of the proposed 21st Avenue South alignments and the transitional nature of the residential neighborhood on 18th Avenue South. Pursuant to FWCC Section 22-1477, the required right-of-way width may be modified by the Director of Public Works to avoid right-of-way acquisition and lessen the impact to the neighborhood, and utility undergrounding will not be required. Therefore, the applicant will construct 18th Avenue South as a modified street section between the southern extent of the street improvements in Kits Corner Business Park and South 344th Street.
51. The rerouting of trips using this connection on 18th Avenue South would add 417 trips to the east leg of South 344th Street east of 16th Avenue South, and 128 trips between 16th Avenue South and SR 99 during the Sunday after service peak hour. Both of these intersections are currently unsignalized. The addition of these trips would create LOS failure and safety issues associated with unsignalized intersections operating over capacity. Staff has determined that these intersections would not operate safely if the project's trips impacted these intersections prior to the completion of the Transportation Improvement Plan (TIP) project scheduled for 2008 that would add left-turn lanes on South 344th Street and signalize both intersections. Therefore, the applicant will construct traffic signals at these intersections.

52. Staff analysis has determined that the project's trips meet warrants for left-turn lanes in the westbound direction at both the intersections of SR99 and 16th Avenue S and S 344th Street and 16th Avenue S. Eastbound left-turn lanes may also be needed to line up lanes across the intersections within allowable tapers, depending on the intersection geometrics; this will be determined through engineering plan review of these intersections. Although the EIS identifies impacts related to right-of-way acquisition in order to provide full-standard improvements, it is not necessary to provide full street improvements to mitigate the safety and LOS deficiencies at these intersections. The applicant will be required to develop a design that mitigates the safety and LOS impacts while minimizing right-of-way acquisition. The applicant will provide signalization and westbound left-turn lanes necessary to assure the safe operation of these intersections in the interim. Signal interconnect will also be provided between the two signalized intersections. The need for eastbound and westbound left-turn lanes will be determined during engineering plan review. The requirement for any of the left-turn lanes on South 344th Street may be waived by the Public Works Director if it is determined that to do so would require right-of-way acquisition.
53. The intersection of 16th Avenue South/Enchanted Parkway South (SR 161) at South 348th Street (SR 18) fails the adopted LOS standard during the school afternoon peak and the Sunday peak with or without the project. The project would add 150 trips during the school afternoon peak hour and 328 trips during the Sunday peak hour. The EIS identifies the construction of a second northbound right-turn lane as a mitigation measure that would correct the LOS deficiency during the school afternoon peak by improving the LOS from F to D, and reducing the LOS deficiency significantly during the Sunday peak hour by reducing the volume/capacity ratio from 1.24 to 1.04. This mitigation measure is in addition to the project in the adopted 2004-2009 TIP, which would add a third westbound left-turn lane and eastbound and westbound right-turn lanes. Based on the traffic analysis for the EIS, in order to function without being blocked by queues in the through lanes, the right-turn lanes would need to provide 550 feet of storage. Therefore, the applicant will pay \$350,000 to expand the scope of the City's existing project to add the construction of a second right-turn lane with 550 feet of storage.
54. WSDOT is proposing to construct a major revision to the I-5/SR 18 interchange, which would include access between SR 161 and I-5 to and from the north. This would provide an alternative route that would reduce traffic volumes through the intersection of SR 18 and SR 161. Therefore, it is unknown at this time what intersection configuration will be needed over the longer term at SR 18 and SR 161. Consequently, the addition of through lanes northbound that would be needed to meet the LOS standard in 2007 may not be needed after 2012.
55. The intersection at 20th Avenue South at the south central site access fails the adopted LOS standard during the Sunday after service peak as a result of the project. It is impacted by 1047 Sunday peak hour trips. The EIS addressed four options for addressing the LOS failure: provision of a two-way left-turn lane on 20th Avenue South, construction of a roundabout, signalization, and flagging the driveway during peak hours. Provision of a two-way left-turn lane is recommended to accommodate turning movement volumes, but does not fully mitigate the LOS deficiency. Left-turn volumes from 20th Avenue South into the driveways are high enough that the two-way left-turn lane would not be available for use as a refuge area for vehicles turning left from driveways onto 20th Avenue South. Flagger control during the project's peaks would safely manage traffic only when it is needed. CFC has proposed this option in the TMP. Given the low volumes of through traffic on 20th Avenue South during the project's peak hours of trip generation on Sundays, and the relative lack of impacts by the use of flagger control compared to the other alternatives, flagger control is the recommended mitigation for this location. The applicant will provide flagger control of this

driveway during Sunday peak hours, subject to conditions of the Right-of-Way Activity Permit to be issued by the Department of Public Works.

56. The EIS suggests as a mitigation measure to minimize the intrusion of project-generated traffic into residential neighborhoods to the north of the site an education program to influence route choices by notices, announcements, and new member orientation used to educate drivers. Pursuant to FWCP Policy TP5, the applicant will provide an ongoing education program to minimize traffic intrusion into adjacent residential neighborhoods.
57. The EIS discusses a broad range of traffic calming tools that might be used to discourage through traffic from using 20th Avenue South north of the site, and to maintain reasonable speeds for a residential neighborhood for those that do choose to use 20th Avenue South. Based on the analysis of the alternatives by staff, a through movement diverter is recommended and will be placed at the intersection of 20th Avenue South and South 336th Street, and is intended to prohibit through movements on 20th Avenue South across South 336th Street. All other movements at the intersection would be permitted. The design will accommodate transit turning movements and full access for emergency vehicles, making it possible that smaller vehicles could still drive around the diverter.
58. Despite the diverter, some project-generated traffic may still be expected to use 20th Avenue South to the north of the site. Therefore, there is still some need to discourage the use of 20th Avenue South through traffic calming north of the site, even with the through movement diverter. Traffic circles have been found by many agencies to significantly reduce intersection collisions and slightly reduce midblock vehicle speeds. In order to be effective at reducing speeds and encourage yielding behavior, deflection of the driver's path upon entry to the traffic circle is required. At a three-legged intersection such as at South 332nd Street, additional pavement widening may be required to provide for adequate deflection and provide positive guidance to the driver. In no case should additional right-of-way be required. Pursuant to FWCP Policy TP5, the applicant will place the through movement diverter at the intersection at South 336th Street, and yield-controlled traffic circles at South 330th Street and South 332nd Street to reduce intersection collisions and midblock vehicle speeds.
59. Neighborhood Traffic Meetings were held June 3, 2004 and June 25, 2004 with the residents on 18th Avenue South to determine the best solution for improving 18th Avenue South. Based on the discussions at the meetings, the residential segment of 18th Avenue South will be improved to a modified street section, consisting of 24 foot wide street with vertical curb and gutter, 5-foot sidewalks and 2 additional street lights mounted on existing power poles. Traffic calming elements will be installed, including two speed humps, 1 crosswalk, bulb outs at the intersection of 18th Avenue S and S 341st Street and 18th Avenue S and S 344th Street to narrow the throat width of 18th Avenue S to 20 feet, and street signage to address no through truck traffic, children playing, speed humps, crosswalk and speed limit will be installed.
60. The EIS discusses the potential advantage of extending the code-required frontage improvements on the south side of South 336th Street to provide pedestrian access to transit and the sidewalk network on SR 99. The intersection of SR 99 and South 336th Street is served by Metro Route 182 and Pierce Transit Routes 402 and 500. The City's project on SR 99 will provide transit amenities at the bus stops at this intersection. These improvements could be provided at little additional expense and would connect to one of the best-served transit corridors in the City. Therefore, pursuant to FWCP Policies TP62, TP65, and TP77, the applicant shall provide sidewalk on the south side of South 336th Street to be extended from the west property line of the site to SR 99.

61. The EIS discusses the provision of transit amenities such as shelters, benches, bus landing pads, etc. as a potential mitigation measure. The site is served by Pierce Transit Route 501 at a bus stop located on the south side of South 336th Street east of 20th Avenue South, and a bus stop located on the east side of 20th Avenue South north of South 336th Street. Sidewalks will be provided to the bus zone by code-required frontage improvements on South 336th Street. Pursuant to FWCP Policies TP62, TP65, and TP77, the applicant will provide a transit shelter (if requested by King County Metro or Pierce Transit), shelter footing, litter receptacle pad, bus landing pad, and bench, designed to King County Metro standards, located by City staff in consultation with King County Metro and Pierce Transit staff on the north side of South 336th Street east of 20th Avenue South, and on the east side of 20th Avenue South north of South 336th Street. In addition, the sidewalk will be extended on the east side of 20th Avenue South from the intersection of South 336th Street to this latter bus zone. This will help mitigate increased vehicle trips from the project.
62. The EIS addresses pro-rata share mitigation for impacts to capital projects listed on the City's TIP based on the specific project generated trips. The calculation of pro-rata contributions is described in the TIA Guidelines item VI.D. In general, the pro-rata contribution is the number of evening peak project-generated trips divided by the total evening peak hour traffic with the project multiplied by the estimated cost of the TIP project. Pursuant to FWCC Section 22-1475 and FWCP Policy TP62, the applicant shall either construct the impacted TIP projects or pay \$235,900 as a pro-rata mitigation payment for impacts to projects in the 2004-2009 TIP, as identified in the Agreement.
63. The project impacts a capital project in unincorporated King County at the intersection of South 320th Street and Military Road S. Therefore, the applicant will pay King County \$647 as a pro-rata share mitigation payment for impacts to the County project.
64. The development proposal includes signalization of the intersection of 20th Avenue South and South 336th Street. This intersection meets *Manual on Uniform Traffic Control Devices* (MUTCD) warrants for signalization under existing conditions; thus the proposal is consistent with FWCC Section 22-1476. The MUTCD also recommends that traffic signals within one-half mile of each other be able to be coordinated. This intersection is one-quarter mile east of the signalized intersection of SR 99 and South 336th Street. FWCP Map III-3 shows that these facilities were planned to have signal communications available between them. Pursuant to FWCP Policy TP39, the applicant will provide signal interconnect on South 336th Street between SR 99 and 20th Avenue South.
65. Based on the traffic analysis in the EIS, left-turn lanes on South 336th Street are warranted during all weekday peak hours analyzed eastbound, and during all peak hours analyzed westbound. In order to provide the left-turn lanes, the existing westbound shoulder could be restriped as a through lane. However, this would eliminate the safe walking route for school children to reach a school bus stop on 20th Avenue South from South Garden Court and Green Crest Villas condominiums. Therefore, the applicant will provide continuous sidewalk improvements on the north side of South 336th Street between South Garden Court and Green Crest Villas to provide a safe walking route to the bus stop.
66. The TIA guidelines adopt the use of an article, *Guidelines for Right-Turn Treatments at Signalized Intersections*, for determining the need for right-turn lanes at signalized intersections. Based on the traffic analysis in the EIS, right-turn lanes are warranted on all legs of the intersection of 20th Avenue South and South 336th Street. In conjunction with the through movement diverter, no through lanes on 20th Avenue South would be required. Thus, no additional widening would be

necessary on the south leg of the intersection. On the north leg of the intersection, the right-turn lane would have to have a vehicle storage length of 175 feet to function effectively. A right-turn lane on the west leg of the intersection would require additional right-of-way dedication from the project, and would have to provide 100 feet of storage to function effectively. Per WSDOT Design Manual Figure 910-14, right-turn lanes would also require 50-foot tapers. The applicant shall construct improvements to the intersection of 20th Avenue South at South 336th Street that provide signalization; signal interconnect on South 336th Street between SR 99 and 20th Avenue South; left-turn lanes on all legs of the intersection and an eastbound right turn lane with 100 feet of storage; a southbound right-turn lane that provides 175 feet of storage; the diverter island that would prohibit through movements on 20th Avenue South. These improvements mitigate the project impacts by providing adequate levels of service at the intersection, while discouraging project-generated traffic from impacting residential neighborhoods north of the site.

67. Based on the traffic analysis in the EIS, under the worst case queuing, the westbound left-turn lane at the intersection of SR 99 and South 336th Street would need a storage length of 450 feet. The existing storage available is 100 feet. The increase in storage length, combined with associated tapers per WSDOT Standard Plan H-3, would overlap the taper necessary to accommodate the left-turn lane at the site driveway onto South 336th Street. Therefore, pursuant to FWCC Section 22-1475, the applicant will provide a continuous left-turn lane between SR 99 and 20th Avenue South.
68. New traffic signals are proposed at the intersections of 20th Avenue South at South 336th Street, 16th Avenue South at South 344th Street, and SR 99 at South 344th Street. In addition, the project would significantly alter travel patterns before and after Sunday services. New signal coordination timing plans would need to be developed to accommodate safe and efficient travel in the project vicinity. Pursuant to FWCP Policy TP39, the applicant will develop timing plans for Sunday peak hours of the development at SR 99 at South 324th Street, SR 99 at South 330th Street, SR 99 at South 336th Street, 20th Avenue South at South 336th Street, 16th Avenue South at SR 99, 16th Avenue South at South 344th Street, and SR 161 at SR 18.
69. Transportation mitigation provided in the Development Agreement is consistent with goals and policies contained in the FWCP Transportation Chapter, including TP5, TP10, TP14, TP16, TP20, TP21, TP23, TP30, TP38, TP39, TP45, TP47, TP62, TP65, and TP77.
70. FWCC Section 22-1671 sets out factors to be considered for a development agreement. The City may consider, but is not limited to, the following factors when considering a development agreement: 1) compatibility with and impact on adjacent land uses and surrounding neighborhoods; 2) adequacy of and impact on community facilities including utilities, roads, public transportation, parks, recreation, and schools; 3) potential benefits of the proposal to the community; and 4) effect upon other aspects of the comprehensive plan.
71. Development of the site in accordance with all adopted City codes, policies, regulations, conditions of approval, and mitigation contained in the Development Agreement, will address project-related impacts and ensure compatibility with adjacent land uses and surrounding neighborhoods. Transportation impacts to surrounding neighborhoods will be addressed by code-required street frontage improvements and mitigation established in the development agreement, including additional street and sidewalk connections; a new street through the site; traffic calming measures such as traffic circles and island diverters; signalization; transit shelter improvements; signal timing plans; traffic management plan; and operational parameters governing use of the site. Conditions of the Hearing Examiner's Process IV decision will ensure that project-related impacts to on site wetlands, streams, and buffers are addressed. Mitigation in the Development Agreement pertaining

to clearing, grading, and landscaping, will further address construction and development-related impacts. The Director's Design Decision also ensures quality design standards and project aesthetics for compatibility with surrounding neighborhoods. Additionally, the use of the property as a church and school is more compatible with the surrounding neighborhoods than the types of uses allowed under BP zoning. Therefore, development of the site in accordance with all adopted City codes, policies, regulations, and conditions of approval, and mitigation contained in the Development Agreement is compatible with, and will not adversely impact, adjacent land uses and surrounding neighborhoods.

72. Development of the site in accordance with all City codes, policies, and regulations and conditions of approval and mitigation contained in the Development Agreement will ensure adequacy of, and address impacts to, community facilities including roads, public transportation, parks, recreation, and schools. Potential transportation-related impacts to adjacent street and the City transportation system were considered in the EIS. Mitigation for these impacts included in the Development Agreement, pursuant to City Code and the EIS, includes system improvements such as construction and dedication of 20th Avenue South through the site, connecting and improving 18th Avenue South, frontage improvements, signaling of intersections, and traffic calming measures and transit improvements. Driveway and street access to the site was reviewed and determined to be at the optimal location and configuration, subject to the City's adopted design standards and street plans. The recreational needs of the school and day care students will be met on site by the code-required outdoor play areas, and the play field. The minimum amount of outdoor play area included in the Development Agreement meets and exceeds the requirements of the City of Federal Way and the State Superintendent of Public Instruction. In addition, users of the site may utilize City parks in the area. Any such use is expected to be small. The proposed development contains a private school.
73. The proposed church and school are expected to generate employment opportunities and potential economic and social benefits. Based on information provided by CFC, it would employ 120 employees. CFC hosts several major conferences each year, including the Vision Conference attracting 2,500 – 3,000 visitors each March, and a women's conference attracting approximately 2,000 visitors each November. CFC also participates in foreign exchange programs and estimates approximately fifteen to twenty percent of its students are from foreign countries. Employees, members of the congregation, and others who come for services, meetings, and school, may also patronize local merchants and service providers such as retail, restaurants, hotels, and entertainment. Therefore, more economic benefit would be anticipated than is currently generated by the existing vacant site. Additionally, CFC proposes several commercial activities on the site, including latte stands and bookstores, which are expected to generate revenue. As proposed and as required, the project will construct needed right-of-way improvements on and off site, including a new fully-improved City street through the site; street frontage improvements including curbs, gutter, sidewalk, street trees, street lights, and a bike lane; and other street improvements identified in the Development Agreement. Such improvements will promote safe and effective vehicle and pedestrian circulation on the site and in the immediate vicinity. In addition, the project will convert a large, vacant site that has historically been unused to a development that meets all City code requirements for landscaping, lighting, pedestrian amenities, site surveillance, and architectural design principles. CFC will provide educational opportunities through a school and college. It will provide recreation fields and a venue for special events within the City. Conditions contained in the Development Agreement will ensure mitigation of adverse impacts to on-site environmentally sensitive areas resulting from the development. Also, religious organizations typically operate or participate in various local social service-related programs such as food and clothing banks, Youth programs, and counseling, from which the community may benefit. Therefore, development of the site in accordance with all City codes, policies, regulations, and conditions of approval and

mitigation contained in the Development Agreement will provide potential benefits to the community.

74. Development of the site in accordance with all City codes, policies, and regulations and conditions of approval and mitigation contained in the Development Agreement will have no negative impact upon any other aspects of the comprehensive plan. The vision of the FWCP is to provide a supply of land for such uses as services, employment, parks, open space, and housing to meet future demand. If developed as proposed, the Project will provide land for services, employment, and recreational areas. The BP zone is that zone intended for industrial uses including manufacturing and warehousing. The July 2000 Market Analysis concluded that there would be a low demand for BP-zoned land. Therefore, the reduction in BP zoned land, resulting from changing the designation of this site from Business Park to Multiple Family will not affect the vision of the comprehensive plan.
75. FWCC Sections 22-529 (incorporating 22-448(c) by reference) and 22-530 set forth the factors that may be considered for a site-specific comprehensive plan amendment and associated rezone, and the criteria for such amendments. The City may consider, but is not limited to, the following factors when considering a proposed amendment to the comprehensive plan: the effect upon the physical environment; the effect on open space, streams, and lakes; the compatibility with and impact on adjacent land uses and surrounding neighborhoods; the adequacy of and impact on community facilities including utilities, roads, public transportation, parks, recreation, and schools; the benefit to the neighborhood, City, and region; the quantity and location of land planned for the proposed land use type and density and the demand for such land; the current and projected population density in the area; and the effect upon other aspects of the comprehensive plan. In order to encourage efficient and desired development and redevelopment of existing land designated and zoned for various types of commercial uses, when considering proposals for comprehensive plan amendments and rezones from one commercial designation to another, the City will consider development trends in commercially zones areas, market demand for various types of commercial land, and amount of vacant commercial land. For site-specific comprehensive plan amendments, the provisions of FWCC Section 22-488(c) shall also apply.
76. FWCC Section 22-488 established the following rezone criteria that must be considered. The proposed rezone is in the best interest of the residents of the City; and the proposed rezone is appropriate because either: 1) conditions in the immediate vicinity of the subject property have so significantly changed since the property was given its present zoning and that, under those changed conditions, a rezone is within the public interest; or 2) the rezone will correct a zone classification or zone boundary that was inappropriate when established; it is consistent with the comprehensive plan; it is consistent with all applicable provisions of the chapter, including those adopted by reference from the comprehensive plan; and it is consistent with the public health, safety, and welfare; and the proposed project complies with this chapter in all respects; and the site plan of the proposed project is designed to minimize all adverse impacts on the developed properties in the immediate vicinity of the subject property; and the site plan is designed to minimize impacts upon the public services and utilities; and the rezone has merit and value for the community as a whole.
77. The requested comprehensive plan amendment and rezone, from BP to RM 3600, would not in itself affect the physical environment if approved. It would result in changes to the comprehensive plan map and zoning map. Pursuant to the proposed Development Agreement, development of the site would be limited to two buildings with associated parking and recreational and athletic fields. One building would consist of a church sanctuary, school auditorium, and approved accessory uses, and the other building would be used as a private school. An evaluation of potential impacts to the

physical environment as a result of the development of the site as proposed was conducted in an EIS. If the property is developed in accordance with all applicable adopted City codes, policies, regulations, and mitigation contained in the proposed Development Agreement, impacts to the physical environment will be mitigated.

78. The site contains environmentally sensitive areas, as studied in the EIS, including regulated wetlands and streams and their buffers. The Hearing Examiner has approved certain intrusions into these areas, subject to City Council decisions on the comprehensive plan amendment, rezone, development agreement and development plan, in order to construct the project as proposed. Activities approved by the Examiner include filling a Category III wetland and its buffer, and related mitigation including a created wetland and additional buffer area in and adjacent to a Category II wetland on the site. Additional intrusions into wetland and stream buffer were approved in order to accommodate an access road and construct required right-of-way and related improvements including pavement widening, retaining walls, and extending storm pipes and stream culverts. Construction of the site in accordance with all conditions of the Hearing Examiner's decision will result in no net loss of wetlands and wetland buffers and stream buffers. In addition, pursuant to the Hearing Examiner's conditions of approval, all on site wetlands, streams, and their required buffers will be set aside and recorded as Native Growth Protection Easements or Tracts and permanently protected from any future land modifications or intrusions. In addition, the Development Agreement establishes mitigation pertaining to surface water drainage detention and water quality treatment that meets and exceeds code requirements. No lakes are present on the site. If the property is developed in accordance with all applicable adopted City codes, policies, regulations, and mitigation contained in the Hearing Examiner Decision and proposed Development Agreement, impacts on open space, streams and lakes will be mitigated.
79. The request for a change in comprehensive plan designation and zoning from BP to RM 3600 zoning (one unit per 3,600 square feet) is accompanied by a proposed Concomitant Agreement and Development Agreement, which contains a variety of mitigation measures related to site use and operation, transportation, parking, landscaping, and surface water drainage, designed to ensure compatibility with adjacent land uses and surrounding neighborhoods. In addition, rezoning the site from industrial to multifamily with a church and school development would be more compatible with residentially-zoned properties in the area than uses that may develop under the current industrial zoning, such as a warehousing facility with associated truck traffic. If the property is developed in accordance with all applicable adopted City codes, policies, regulations, and mitigation contained in the proposed Development Agreement, the development will be compatible with adjacent land uses and surrounding neighborhoods, and impacts on adjacent land uses and surrounding neighborhoods will be mitigated.
80. Development of the site as proposed, in accordance with all applicable codes, policies, regulations, conditions of approval, and mitigation measures contained in the Development Agreement, will ensure the adequacy of, and mitigate impacts on, roads, public transportation, parks, recreation, and schools.
81. The July 2000 Market Analysis concluded that there would be only an 11 to 13 percent demand for BP-zoned land in the 2000 to 2020 period. Therefore, it is possible that this land would not develop for BP uses in the near future. Conversion of the vacant site from vacant property, which is unlikely to develop in the near future, to a developed site as proposed, in accordance with all applicable codes, policies, regulations, conditions of approval, and mitigation measures contained in the Development Agreement, will be a benefit to the neighborhood, City, and region.

82. Due to the size of its existing congregation, school, and accessory uses such as administrative offices, Dominion College, day care, and future projections for growth, the CFC would like to locate on an approximate 50-acre parcel. Based on a survey of the King County Assessor's records conducted by City staff, there are only two vacant parcels in the City that are 25 acres or more in size. One of these is the parcel under discussion and the other one is the subject of Kits Corner request, located south of South 336th Street and west of Pacific Highway. The July 2000 Market Analysis concluded that there would be only an 11 to 13 percent demand for BP-zoned land in the 2000 to 2020 period. Therefore, it is possible that this land would not develop for BP uses in the near future and a comprehensive plan change and rezone to multiple family zoning and development of the site as proposed, in accordance with all applicable codes, policies, regulations, conditions of approval, and mitigation measures contained in the Development Agreement, will provide the quantity and location of land necessary for the proposed land use, density, and demand for such use.
83. If this site were developed today as warehousing under the existing BP zoning, it would generate approximately 268 employees. Based on information provided by the CFC, if the request for a multiple family designation was granted, and the facility was constructed as proposed, it would employ 120 employees. If the comprehensive plan and rezone is approved pursuant to the proposed Concomitant Agreement and Development Agreement, the use of the site is limited to the proposed church and school and permitted accessory uses, and it will not generate housing units. Rezoning of this site to allow development as a church and school will not impact the City's ability to meet required housing targets mandated under the Growth Management Act (GMA). Therefore, the proposal will not impact current and projected population density in the area.
84. There will not be any adverse impacts upon any other aspect of the comprehensive plan as a result of the proposed change from industrial zoning to multifamily zoning, pursuant to an approved Concomitant Agreement and Development Agreement. The vision of the comprehensive plan is to provide a supply of land for such uses as services, employment, parking, open space, and housing, to meet future demand. The BP zone is that zone intended for industrial uses, including manufacturing and warehousing. One of the reasons that the July 2000 Market Analysis was prepared was to determine whether the City has a 20-year supply of adequately zoned land to meet future demand. The Market Analysis concluded that there would be a low (11-13 percent) demand for BP-zoned land within the 20-year horizon. Therefore, changing the designation of this site from BP to multiple family will not affect the vision of the comprehensive plan of providing an adequate supply of land to meet future demand.
85. As described Findings 77 through 84 above, the requested comprehensive plan amendment and rezone as mitigated does not adversely impact the physical or natural environment; surrounding properties; the adequacy of community facilities; population; or the comprehensive plan; including the supply of and demand for BP-zoned property in the City. Therefore, the rezone is in the best interests of the residents of the City.
86. The City of Federal Way incorporated in February 1990. At that time, the parcels proposed for development by CFC had a mix of multi-family zoning on the west and light manufacturing zoning on the east. Upon incorporation, the City of Federal Way zoned the parcels Manufacturing Park (MP). This was changed to Business Park (BP) in 1995. Properties to the north across South 336th Street have developed as multi-family in recent years. However, very little BP zoned land has developed in this area. Additionally, the July 2000 Market Study found that there would be only an 11 to 13 percent demand for BP-zoned land in the 2000 to 2020 period. As a result, rezoning this property is appropriate and in the public interest, to allow its development rather than remaining

vacant, while at the same time maintaining an adequate supply of industrial zoned property to meet the anticipated demand.

87. The criterion that the rezone will correct a zone classification or zone boundary that was inappropriate when established is not applicable.
88. The requested rezone from BP to RM-3600 does not conflict with the vision of the comprehensive plan to accommodate industrial uses, such as warehousing and manufacturing, in BP zones located on both sides of SR-99 in the vicinity south of South 336th Street, with other BP nodes located around South 272nd Street and South 348th Street. As noted in Finding 84 above, the requested comprehensive plan change and rezone will not decrease the City's supply of BP-zoned property commensurate with the anticipated demand. Rezoning and development of the site pursuant to all applicable adopted City codes, policies, regulations, conditions of approval, and mitigation contained in the proposed Development Agreement, will ensure consistency with the comprehensive plan.
89. If the request is granted, use and development of the site must comply with all applicable provisions of this "chapter" (FWCC) and all applicable adopted regulations; Process IV conditions of approval; mitigation; and the FWCP. Furthermore, a comprehensive plan amendment from BP to multiple family and associated rezone is required for the property to be developed as a church and school. Therefore, the requested rezone, if approved and developed pursuant to all applicable adopted City codes, policies, regulations, conditions of approval, and mitigation contained in the proposed Development Agreement, will be consistent with the comprehensive plan and the "chapter".
90. The requested comprehensive plan amendment and rezone has been analyzed and determined to be consistent with the FWCC and adopted regulations; and the FWCP, and is therefore consistent with the public health, safety, and welfare.
91. Based on Findings 86 through 90, the criteria in FWCC Section 22-488(c)(1)a-e) are met.
92. The proposed development has been reviewed pursuant to all applicable provisions of this chapter (FWCC), and as proposed and as conditioned, it complies with this chapter in all respects.
93. The use of a Concomitant Agreement and Development Agreement enables the City to limit the use of the site to a church, school, and approved accessory uses. As described in Findings 77 through 84, the Development Agreement has been crafted to minimize adverse impacts on the developed properties in the immediate vicinity. Examples include, but are not limited to, requiring a larger buffer along South 336th Street, limiting the enrollment of the school and Dominion College, and restricting the scheduling of activities, such as requiring school classes to be completed by 3:30 p.m. and not scheduling special events that add trips during peak hours of other uses. The site plan of the proposed project is designed to minimize all adverse impacts on the developed properties in the immediate vicinity of the subject property.
94. All public services and utilities are available and adequate to serve the proposed development. Lakehaven Utility District has provided Certificates of Water and Sewer Availability for the site, and will provide these services pursuant to developer extension agreements between the applicant and District. Fire and emergency medical services will be provided by the Federal Way Fire Department. A City-operated regional storm drainage detention pond located in the northwest portion of the site has been determined to have sufficient capacity to accommodate surface water

drainage from the westerly sub-basin of the proposed development. The applicant will provide storm drainage detention facilities for the easterly sub-basin on the site in accordance with the FWCC and Development Agreement. Surface water drainage mitigation contained in the Development Agreement provides a higher standard of water quality treatment for both the East and West Sub-basins on the site, and a higher standard of detention on the East Sub-basin, than would otherwise be required by code. The site plan is designed to minimize impacts upon public services and utilities.

95. Rezoning of this site from BP to multiple family has merit and value for the community as a whole because it will allow development of a site that has not yet been developed and may not develop under the current zoning based on the City's Market Analysis, it supports Growth Management Act goals and policies for urban development, and for the reasons stated in Finding 73.
96. The proposed comprehensive plan amendment has been analyzed and determined to be consistent with the FWCC and FWCP, and therefore bears a substantial relationship to public health, safety, or welfare.
97. The requested comprehensive plan amendment, rezone, and development of the site as a church and school pursuant to the proposed Development Agreement, is expected to generate some benefits to the community, including employment opportunities, development of a previously undeveloped site, potential economic benefit to local shopping areas, restaurants, and hotels; and provision of social services such as food and clothing banks, and youth programs, and counseling programs, as discussed in Finding 73. Therefore, the proposed amendment is in the best interest of the residents of the City.
98. RCW Chapter 36.70A, the *Growth Management Act*, requires the City of Federal Way to adopt and implement a comprehensive plan and to amend it in a timely manner, but no more than once a year, except under certain circumstances. The City is responding to this mandate by updating the comprehensive plan. FWCP Page IV-7 (Economic Development), recognizes that there has been no substantive BP development since the City's incorporation, which suggests the influence of market forces outside of the City limits, where cheaper land and established industrial parks act as a draw for prospective park development. Therefore, the change in comprehensive plan designation and zoning of this site from BP to multiple family will not reduce the supply of BP-zoned property below what is necessary, and will enable development consistent with the economic development vision in the plan. The proposal is consistent with FWCP Economic Development Policies EDP11, EDP22, and EDP23, related to bringing in new jobs to the community, developing cultural and recreational opportunities, and encouraging the development of new multi-purpose facilities in order to increase the number of visitors to Federal Way and resultant visitor spending. The proposed amendment is, therefore, consistent with the requirements of RCW 36.70A and with the portion of the City's adopted plan not affected by the amendment.
99. As addressed in the staff report, the proposed comprehensive plan amendment and rezone have been reviewed and determined to be consistent with all applicable decisional criteria contained in the FWCC, and with the applicable goals and policies contained in the FWCP.
100. As addressed in the staff report, the Development Agreement and Development Plan have been reviewed and determined to be consistent with all applicable decisional criteria contained in the FWCC, and with the applicable goals and policies contained in the FWCP.

K:\CFC\Documents\Findings – Exhibit D to Adoption Ordinance

9.2.4 School Hours. School classes shall be completed no later than 3:30 p.m. daily.

9.2.5 Holiday Services/Special Events. Holiday services and special events shall be scheduled consistent with the approved Traffic Management Plan (TMP) required by 9.4.12 and consistent with 9.1.4.4.

9.3 Construction Mitigation.

9.3.1 Erosion Sediment Control. CFC shall designate and provide an onsite Erosion Sediment Control (ESC) Supervisor approved by the Director of Public Works, who possesses a Construction Site Erosion and Sediment Control Certification by the Washington State Department of Transportation (WSDOT). This ESC Supervisor shall be available for the duration of the project. The qualifications and responsibilities of the ESC Supervisor are outlined in the 1998 King County Surface Water Design Manual (KCSWDM) and City of Federal Way Addendum. The Director of Public Works may further limit clearing and grading activities on the site based on recommendations from the ESC Supervisor and requirements of the KCSWDM.

9.3.2 Stormwater Pollution Prevention Plan. A construction Stormwater Pollution Prevention Plan (SWPPP) shall be provided by CFC and reviewed and approved by the Director of Public Works prior to issuance of any construction permits or authorizations. Construction phasing shall be included in this plan. CFC has proposed several BMP's which shall be captured in the SWPP plan including, but not limited to, confining refueling and equipment maintenance to a hard-surface staging area with spill containment features and a spill clean-up kit, and pipe slope drains used to convey storm water over steep slopes.

9.3.3 Clearing and Grading. Clearing and grading shall be allowed only pursuant to a phased construction plan approved by the Director of Public Works. Clearing and grading shall occur only between May 1 and September 30 unless otherwise approved by the Director of Public Works.

9.4 Traffic Mitigation. CFC shall perform, as part of Project construction and prior to issuance of certificate of occupancy unless otherwise noted, the following traffic mitigation as required and approved by the Director of Public Works.

9.4.1 CFC shall reconstruct 18th Avenue South from the existing berm to S 344th Street to a Type R street modified street section, consisting of 40-24 foot wide street with vertical curbs, and gutters, 4-foot planter strips with street trees, 65-foot sidewalks, and two additional street lights mounted on existing power poles, and traffic-calming elements, in a 60-foot right-of-way, consistent with the attached Exhibit G-1. Traffic calming elements shall be installed, including 2 speed humps, 1 crosswalk, bulb outs at the intersection of 18th Avenue South and S 341st Street and 18th Avenue South and S 344th Street to narrow the throat width of 18th Avenue South to 20 feet, and street signage shall be installed to address no through truck traffic, children playing, speed humps, crosswalk and speed limit.

9.4.2 CFC shall improve S 344th Street from 16th Avenue S to 18th Avenue S consistent with the attached Exhibit G-2. Construction shall consist of Type R Street. The north

become frustrated and learn to use alternate routes. The EIS analysis assumed that most of these trips would leave the site to the north onto S 336th Street, and most would head west on S 336th Street to SR 99 and turn left to 16th Avenue S or continue straight on SR 99. Although no capacity improvements appear warranted as a result of this assignment, staff has significant concerns about the safety of the 16th Avenue S / S 341st Place intersection under this scenario. It has been the City's experience that unsignalized intersections operating near capacity have a higher than average collision rate. This is due primarily to increased driver frustration, leading to drivers choosing gaps in opposing traffic that are inadequate to complete the maneuver safely. Therefore, this alternative is not recommended.

47. The roundabout alternative would provide adequate levels of service. In order to accommodate planned traffic volumes, it would have a 3-lane roundabout with an inscribed diameter of 200 feet. As SR 99 is a state highway, any intersection modifications would have to be approved by WSDOT. To date, WSDOT has not approved any three-lane roundabouts on the state highway system, and its historical reluctance to approve 2-lane roundabouts casts doubt as to whether this would be a viable alternative at this time. In addition, a roundabout would need right-of-way on both sides of SR 99, impacting developed properties on the east side of SR 99. Therefore, this alternative is not recommended.
48. Providing a connection between South 341st Place and South 344th Street reroutes traffic around the intersection of 16th Avenue South and South 341st Place, and takes advantage of a project planned by the City to construct traffic signals on South 344th Street at 16th Avenue South and at SR 99.
49. Potential locations to provide this connection between South 341st Place and South 344th Street are 21st Avenue South and 18th Avenue South. Due to the presence of wetlands, three different alignments for 21st Avenue South were considered in the EIS. An alignment along the existing right-of-way would impact wetlands and result in two stream crossings; an alignment to the east would cross the wetland at its narrowest width, but would still impact wetlands and result in two stream crossings; and an alignment to the west would avoid impacting the stream and wetlands, but would require right-of-way acquisition from the truck parking lot.
50. Eighteenth Avenue South has continuous right-of-way, but is not a through street due to an existing temporary berm. Eighteenth Avenue South provides a preferred alternative to 21st Avenue South due to the wetlands in the vicinity of the proposed 21st Avenue South alignments and the transitional nature of the residential neighborhood on 18th Avenue South. ~~Pursuant to the FWCC, the applicant will construct 18th Avenue South as a Type R street between the southern extent of the street improvements in Kits Corner Business Park and South 344th Street. Pursuant to FWCC Section 22-1477, the required right-of-way width may be modified by the Director of Public Works to avoid right-of-way acquisition and lessen the impact to the neighborhood, and utility undergrounding will not be required. Therefore, the applicant will construct 18th Avenue South as a modified street section between the southern extent of the street improvements in Kits Corner Business Park and South 344th Street.~~
51. The rerouting of trips using this connection on 18th Avenue South would add 417 trips to the east leg of South 344th Street east of 16th Avenue South, and 128 trips between 16th Avenue South and SR 99 during the Sunday after service peak hour. Both of these intersections are currently unsignalized. The addition of these trips would create LOS failure and safety issues associated with unsignalized intersections operating over capacity. Staff has determined that these intersections would not operate safely if the project's trips impacted these intersections prior to the completion of the Transportation Improvement Plan (TIP) project scheduled for 2008 that would add left-turn

lack of impacts by the use of flagger control compared to the other alternatives, flagger control is the recommended mitigation for this location. The applicant will provide flagger control of this driveway during Sunday peak hours, subject to conditions of the Right-of-Way Activity Permit to be issued by the Department of Public Works.

56. The EIS suggests as a mitigation measure to minimize the intrusion of project-generated traffic into residential neighborhoods to the north of the site an education program to influence route choices by notices, announcements, and new member orientation used to educate drivers. Pursuant to FWCP Policy TP5, the applicant will provide an ongoing education program to minimize traffic intrusion into adjacent residential neighborhoods.
57. The EIS discusses a broad range of traffic calming tools that might be used to discourage through traffic from using 20th Avenue South north of the site, and to maintain reasonable speeds for a residential neighborhood for those that do choose to use 20th Avenue South. Based on the analysis of the alternatives by staff, a through movement diverter is recommended and will be placed at the intersection of 20th Avenue South and South 336th Street, and is intended to prohibit through movements on 20th Avenue South across South 336th Street. All other movements at the intersection would be permitted. The design will accommodate transit turning movements and full access for emergency vehicles, making it possible that smaller vehicles could still drive around the diverter.
58. Despite the diverter, some project-generated traffic may still be expected to use 20th Avenue South to the north of the site. Therefore, there is still some need to discourage the use of 20th Avenue South through traffic calming north of the site, even with the through movement diverter. Traffic circles have been found by many agencies to significantly reduce intersection collisions and slightly reduce midblock vehicle speeds. In order to be effective at reducing speeds and encourage yielding behavior, deflection of the driver's path upon entry to the traffic circle is required. At a three-legged intersection such as at South 332nd Street, additional pavement widening may be required to provide for adequate deflection and provide positive guidance to the driver. In no case should additional right-of-way be required. Pursuant to FWCP Policy TP5, the applicant will place the through movement diverter at the intersection at South 336th Street, and yield-controlled traffic circles at South 330th Street and South 332nd Street to reduce intersection collisions and midblock vehicle speeds.
59. Neighborhood Traffic Meetings were held June 3, 2004 and June 25, 2004 with the residents on 18th Avenue South to determine the best solution for improving 18th Avenue South. Based on the discussions at the meetings, the residential segment of 18th Avenue South will be improved to a Type R modified street section, consisting of 24 foot wide street with vertical curb and gutter, 5-foot sidewalks and 2 additional street lights mounted on existing power poles. Traffic calming elements will be installed, including two speed humps, 1 crosswalk, bulb outs at the intersection of 18th Avenue S and S 341st Street and 18th Avenue S and S 344th Street to narrow the throat width of 18th Avenue S to 20 feet, and street signage to address no through truck traffic, children playing, speed humps, crosswalk and speed limit will be installed. The applicant has proposed that the existing bulb in the right of way where the existing cul de sac bulb is located be used as a location for a median island to create a chicane effect, and staff proposes that curb returns on 18th Avenue South be bulbed out into the intersections at South 341st Place and South 344th Street to reduce the potential for trucks to use 18th Avenue South through the residential neighborhood. Staff also recommends signage be placed to prohibit trucks on 18th Avenue South between South 341st Place and South 344th Street and two speed humps be installed. A Neighborhood Traffic Meeting was held June 3, 2004, and Staff will work with the residents on 18th Avenue South to determine the best solution for improving 18th Avenue South.

EQUIPPING THE NEXT GENERATION

33645 20TH AVE S. FEDERAL WAY, WA 98003
253.943.2500 MAIN OFFICE

PACIFICCHRISTIANACADEMY.COM



April 15, 2021

Dear Sound Transit Board:

We recognize that the Sound Transit Board is engaged in an important analysis of sites for a new maintenance facility. Pacific Christian Academy has been a tenant of Christian Faith church for the last 12 years as a separate entity, but prior to 2009 the school was part of the ministry for 23 years. We would like to express our hope that, when final decisions are made, there will be a home for the students who see PCA as their second family. We desire to keep the vision alive not only for our current students, but all the alumni, students, and families who have invested in the school over the last 35 years.

Pacific Christian Academy has been a contributing member of the Seattle/Federal Way community for decades. In that time, the school has demonstrated excellence in preparing young men and women to take their place as productive, contributing members of society. Strong moral values are the hallmark of a Pacific Christian education. Our value for service is lived out as our students volunteer at several critical organizations in our area. We believe we are a good community partner; our students enjoy volunteering in various outreach programs such as helping the elderly, cleaning parks, helping provide food for the hungry, serving in food banks, and partnering with other organizations who are making a positive change in the community.

The Federal Way Mirror noted, after looking at the EIS report, "Being the largest EE-12 Christian school in the Federal Way area, Pacific Christian has a very diverse K-12 student population." Our school provides an education to a widely diverse student population, thus serving the demographics of the families in Federal Way.

We understand the need for a maintenance facility for Sound Transit. We also believe there must be a place for PCA to continue its mission of equipping students to be socially relevant leaders. Time has been invested in looking for a new facility, should Christian Faith be the chosen site. That search has not produced an available site that would allow us to provide an educational experience equivalent to what our students are currently receiving. Our hope and request is that in 2023, Sound Transit will assist Pacific Christian Academy in finding a new home, should the Christian Faith site be chosen. Indeed, we are grateful for the willingness of Sound Transit staff to meet on more than one occasion with our Board of Trustees to discuss progress on the project. We feel confident that Sound Transit understands our desire to remain a viable educational option for the families of Federal Way.

Thank you for your time, effort, and your concern for Pacific Christian Academy. We look forward to hearing from you in the near future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Debbie Schindler', is written over a light blue background.

Debbie Schindler
Head of School

Affiliations





March 26, 2021

Sound Transit Board
401 S. Jackson St.
Seattle, WA 98104

Dear Board Member,

We are writing to you regarding the Sound Transit Authority's (STA) draft Environmental Impact Statement for the Operations and Maintenance Facility South posted on March 5, 2021. Although we found the report to be fairly thorough, it failed to capture the \$10's of millions in direct costs that would be incurred as a result of relocating the Ellenos manufacturing facility which is part of site 10A, also known as the South 344th Street site. In addition, the statement fails to account for the profound opportunity costs to be incurred by Ellenos and the impact on its future as a result if forced to relocate.

When asked by local media his reaction to the possibility of our site being selected, Ellenos Co-Founder and yogurt aficionado, Con Apostolopoulos' immediate reaction was that it would be catastrophic. As a lifelong yogurt manufacturer, Mr. Apostolopoulos knows all too well the sensitive nature of yogurt manufacturing. After an extensive assessment by the Ellenos Management Team his conclusion was reinforced. The economic and strategic ramifications, both immediate and long-term, to our company and its 130+ employees would be crippling and puts into question our ability to survive this dramatic disruption to the business. It will unravel years of strategic investment and development of which the Federal Way manufacturing facility has been central to and will continue to be well into the future.

Relocation of a yogurt manufacturing facility is an extremely complex and disruptive process. Any such effort would significantly undermine our ability to compete in this highly competitive category. This is further exacerbated by the fact such turmoil comes at an immensely critical juncture in our business as we are preparing for notable national distribution over the next 3-5 years. At the core of this challenge is the fact we produce a product with an extremely short shelf life. As such, we must be able to produce product a minimum of 5-days a week in order to meet demand and keep shelves stocked. Based on current growth trajectory we anticipate this will expand to a 24/7 operation by the end 2022. Any disruption to our supply chain will quickly erode the goodwill we have worked hard to foster through the years and result in an immediate retraction of our sales and associated momentum.

It is vitally important that the Sound Transit Authority understands that yogurt manufacturing does not permit the luxury of stockpiling inventory to accommodate the move from one location to another. Product must be consistently produced nearly every day of the week due to its limited shelf life. This becomes increasingly more critical as we achieve geographic expansion where time (due to transportation time to the east coast) becomes increasingly tight. Equally important, it will take a minimum of a year to ensure that a new facility will efficiently and effectively produce product that meet product safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter

unexpected setbacks, which pragmatically speaking, is not likely to be the case. In addition, Ellenos is not presently staffed to address the extensive effort this presents, and we are not in a financial position to do so.

The enormity of relocation should be quite evident based on the overview provided above but does not capture the opportunity costs our organization will also incur as a result. In fact, the opportunity costs are virtually incalculable because they have to factor in not only past but future opportunities lost as a result of the tremendous setback this will create. Our entire 10-year plan is built around having a well-established and operating manufacturing facility so that our focus could be on executing sales, marketing and innovation plans vital to a successful national expansion. We are still in the throes of seeking to reach that critical milestone. Relocating our manufacturing facility will place us a minimum of 3-years behind schedule and result in untold additional costs as we seek to regain our position in the uber-premium yogurt space.

In addition to opportunity costs there is the work around planning, construction, and implementation of a new manufacturing facility. To be very clear, in order to survive we will need to have a fully functioning manufacturing facility before we commence shutting down the current location. We have invested millions of dollars in equipment in order to meet current and future demand. The equipment will need to be replaced in full in order to have a fully functioning facility before we shut down the current location. This includes meeting strict Federal, State and Local permitting requirements. The net result is tens of millions of dollars will be required to duplicate our current operation. There will be very little recovered in terms of selling of the current facility's equipment and no recovery of the significant investment in the infrastructure that was required to design our plant to produce our world class product.

In conclusion, the Environmental Impact Statement, although comprehensive, fails to capture the full impact that selection of site 10A would have on Ellenos. The costs of relocation alone are estimated to be well above \$25MM and does not account for the \$10's of millions in opportunity costs we will incur. These additional facts combined with the EIS for OMF South clearly indicates site 10a is a poor choice relative to the other options put forth. It is hard to fathom how the Sound Transit Authority could choose site 10A given its impact on a PacNW icon (Ellenos), especially considering the additional costs not captured in the EI Statement. This compounded by the fact that not only will Ellenos suffer the grave consequences of such a choice, but so too will the nearly 100 property owners, businesses, family dwellings and churches located within the boundaries of site 10A. We therefore request the STA choose an alternative to the 344th street location when making your final decision.

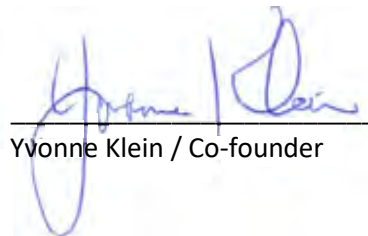
Respectfully submitted,



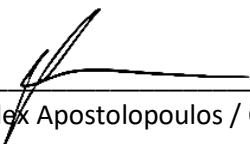
Con Apostolopoulos / Co-Founder



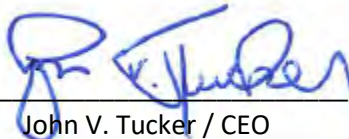
Bob Klein / Co-Founder



Yvonne Klein / Co-founder



Alex Apostolopoulos / Co-Founder



John V. Tucker / CEO

April , 2021

902 South 10th Street
Tacoma, WA 98405

p: 253 272 2206
f: 253 272 6439

Sound Transit Board
401 South Jackson Street
Seattle, WA 98104

**RE: Comments on the Draft Environmental Impact
Statement for the OMF South Facility**

Dear Board Members:

THE SOUTH 344TH STREET ALTERNATIVE WOULD IMPACT THE MOST SOCIAL RESOURCES AND WOULD HAVE THE GREATEST NUMBER OF BUSINESS AND RESIDENTIAL DISPLACEMENTS AS COMPARED WITH THE OTHER BUILD ALTERNATIVES.

(Section 3.6.2.2, page 3.6-9 of the Draft Environmental Impact Statement)
(DEIS)

Nowhere in the Executive Summary does the above conclusion appear. Yet it is totally accurate as shown in a comparison of the 344th Street site with either the Midway Land Fill Alternative or the South 336th Street Alternative for the following reasons:

- A. Table 3.5-5 of the DEIS shows a total of 26 businesses affected at the 336th Street site as compared with 60 businesses at the 344th site. The 336th site will displace three businesses while the 344th Street site will displace 15. Estimated employee displacements are 94 for 336th and 248 for 344th.
- B. Table 3.5-6 DEIS shows the total taxable value of properties that must be acquired at 336th equals 50.8 million, while the taxable value of properties that must be acquired at 344th is almost twice as much at 99.5 million. 336th requires acquisition of 36 parcels and 344th requires acquisition of 64 parcels. Furthermore, said Table does not reflect that the 25 acre, Christian Faith Center, located on the 336th site, is not on the tax roles.
- C. Section 3.4.3.2 DEIS shows that the OMF facility at the 336th site would convert 25 acres of public institution property not currently on the tax roles and 27 acres of vacant land. Therefore, 52 of the 97 acres proposed for acquisition are either not on the tax roles or remain vacant. The DEIS does not fully consider this fact and how it compares with the 344th site.

- D. The Executive Summary reflects that the environmental impacts to critical areas are approximately the same at the 336th and 344th sites. However, the Executive Summary does not reflect that selection of the 344th site will require conversion of the State Department of Transportation's Reserve Conservation Area that the State acquired under the Highway Beautification Act in 1965. While the DEIS recognizes that fact, it contains no discussion of the impacts of the conversion or the difficulty/cost in obtaining approval therefor.
- E. The DEIS assumes that Sound Transit can find a suitable location for the Ellenos Yogurt business if it selects the 344th Alternative. The DEIS also assumes that, similar to an office/warehouse business, Ellenos can simply build-up its inventory prior to the move, and then use its inventory during the time necessary to move and acquire new equipment. Such is impossible. Yogurt has a very limited shelf life and Ellenos must constantly remain in operation to protect its product, its shelf space in retail outlets, and its position in an extremely competitive market. Thus, Ellenos cannot disassemble its equipment at its present location, move it to a new site, and secure proper permits. As forth in the Ellenos letter of March 26, 2021.

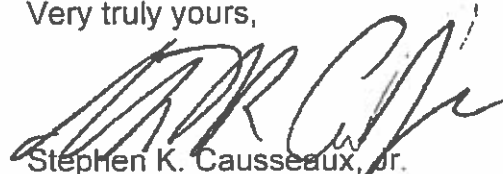
"Equally important, it will take a minimum of a year to ensure that a new facility will efficiently and effectively produce product that meet product safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps require represent 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

Ellenos would need to abandon its equipment at its present location and purchase new equipment for its new location. Such is cost prohibitive.

- F. Ellenos estimates relocation costs alone at above 25 million. Such cost does not account for ten of millions in business opportunity losses it will incur. Ellenos anticipates expanding to a 24/7 operation and hiring many new employees by the end of 2022. Selecting the 344th Street site will put an end to Ellenos yogurt.

Thank you for your consideration of the above matters.

Very truly yours,



Stephen K. Causseaux, Jr.
Managing Partner for Schindler Family Limited
Partnership, Owners of the Ellenos Building

From: Brad Thorson <bradthorson22@gmail.com>
Sent: Monday, April 12, 2021 6:01 PM
To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>
Cc: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Public Comments on Sound Transit OMF South

Thank you for reading my public comments on the OMF South Draft EIS

Public comments to Sound Transit Draft EIS

- The Draft EIS did not specifically include GT owners as residential or business. All 58 Garage Town owners should be included as property owners. All GT owners will be displaced if the S 344th site is selected.
- Ask how evaluation criteria is weighted. If all criteria are weighted equally, then Midway landfill should be the preferred site.
- The South 344th Site generates the most Economic activity, real estate tax and other taxes, compared to the other two sites. The landfill Site and The Christian Faith Center are not on the tax rolls.
- Table 3.3-2 in the DEIS, should be changed to include an accurate parcel count, all GT condo parcels should be included. The S 336th Street site has 19 tax parcels; The S 344th Street site has 109 tax parcels.
- If the South 344th Street is chosen 248 people will lose their jobs, 94 jobs will be lost if the 336th Street site is chosen.
- The Draft EIS did not mention that The Christian Faith Center may want to sell the property. Sound Transit needs to be in conversation with The Christian Faith Center to confirm their desire to sell the property.
- The S 344th Street site is close to the South Federal Way Station and therefore should be considered for Transit oriented development and not considered for the OMF South.
- No mention of possible EPA or other Federal or State Grants to lower cost of the Landfill site.
- Many of the sections of the Draft EIS included numbers and language that included information about the Main Line Extension which made it difficult to look at differences between the S 336th Street site and the S 344th Street sites.
- The Draft EIS did not clearly say that there will be significantly fewer truck trips and less site work on the S 336th Street site. The site work on the S 336th Street site has the lowest impact of all three sites.
- The Full Excavation option for the Midway Landfill site, is not much more costly than the other sites and has fewer negative impacts. This site is favored by most Cities and individuals, and should be selected as the preferred OMF Site.
- GT cannot be rebuilt in King County at a reasonable cost received from Sound Transit. There is no existing property in King County like GT. Community would be destroyed.

- It would be extremely difficult and cost prohibitive to relocate the Ellenos Yogurt facility and maintain delivery to customers. If the South 344th Street site is chosen Ellenos Yogurt would go out of business.
- The Executive Summary of the DEIS reflects that the environmental impacts of the 336th Site and the S 344th sites are about the same. It does not reflect that the selection of the 344th Site would require the conversion of the Washington DOT Reserve Conservation Area and retention pond adjacent to I-5 being relocated to an additional parcel to the south of 344th street, which is not included in many of the site maps for The 344th site.
- If The Sound Transit Board decides not construct Tacoma Dome Link Extension, selection of the S 336th and S 344th sites would require excess mainline track to be constructed.
- The Draft EIS states, on page 3.6-9: “ The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared with the other build alternatives.” This statement of fact was not in the DEIS Executive Summary, and it should be included.
- There are 3 churches located within the S 344th Street site. Is it better to disrupt three churches or 1 church?
- Existing street improvements to the S 344th Street site, not adequate to serve the OMF. Significant improvements to S 344th and S 342nd streets would have to be made. This issue was not addressed in the DEIS

Thank you,

Brad Thorson, President
GarageTown Federal Way
Condominium Association
(206) 947-9416 Mobile
garagetownfederalway.com

From: Brad Thorson <bradthorson22@gmail.com>
Sent: Monday, April 19, 2021 10:31 AM
To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>
Subject: Public comments OMF South

Public comments for Sound Transit, OMF South

1. The Draft EIS does not classify Garage Town Owners as commercial owners or residential owners and these individuals are not included in the count of property owners or parcels, even though occupants of a 4 plex were counted, as documented in Table ES-1 in the Draft EIS. This inaccurate count distorts the true number of individuals impacted in the data for the South 344th Street site contained in the Executive Summary. How do these inaccuracies get corrected and shared with Sound Transit Board members? See Table ES-1 on page ES-17 of the Executive Summary. The table only shows 20 Residential and 11 Business Displacements for the South 344th Street Site. Garage Town has 67 separate individual Condominium parcels and owners. Also see Table 3.5-5 in the Draft EIS.
2. The South 336th Street and The South 344th Street sites require Mainline track for the TDLE to be constructed. What happens if through the Budget review process, Sound Transit decides not to construct the TDLE? The cost of the two southern options for the OMF becomes much more expensive, which might make the Landfill site a better choice. This issue was not discussed in the Draft EIS. See Figure E2.3-2 in the Draft EIS.
3. Is Sound Transit in conversation with the Federal Government or the State of Washington to see if grant money can be made available to help Sound Transit fund the development of the Landfill Site?

Other Comments:

The sizes, in acres, of the three sites is different in Draft EIS Table 3.4-2 and EIS Executive Summary. The South 344th Street site is listed as 59.3 acres in the table and 65 acres in the Executive Summary. Depending on the size one uses for comparison purposes, the South 344th Street site may be too small.

The Draft EIS did not mention that the Christian Faith Center may want to sell to Sound Transit. How do Board Members become aware of this possibility?

No mention of Federal Grants from the EPA or other government agencies to assist with redevelopment costs associated with the landfill. Does the State of Washington support the Landfill Site

Brad Thorson
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Edmonds, WA 98020
(206) 947-9416 Mobile
garagetownfederalway.com

Online Open House Comment 66

Hello, My name is Rod Snyder and I am the VP of Sales and Branch Operations for Red Canoe Credit Union. I am leaving the following comments as to express our hopes and concerns about how the proposed OMF South project site selection might impact our business operations. We have a credit union branch located at 33616 Pacific HWY S in Federal Way. This branch has vehicle access from Pac HWY northbound and from both directions on 336th. The South 336th Street location brings up most of my concerns, especially during the construction phase. The Draft EIS indicated there could be as many as 75 truck trips per day. With this volume of truck traffic on 336th and Pac HWY our members might find it difficult to access their branch and conduct their banking. I am also concerned about road and sidewalk construction on 336th that would temporarily close our vehicle access from our 336th entrance. Here is my question and request for this project, if 336th is selected. Will construction truck traffic travel to the job site using the east side of 336th/Weyerhaeuser Way to access the freeway? This makes much more sense since this area is nearly void of any homes or businesses that would be impacted by the high volume of truck traffic. Having trucks travel up and down HWY 99 to access 336th is a huge congestion problem for an all ready busy intersection. If 336th is selected, my business and so many more would request that the project expect truck traffic to use the east entrance of 336th East and Weyerhaeuser Way to access the job site. Also, if there will be road closure on 336th I request that there never be both directions closed at any given time. My business only has 2 access points, northbound Pac HWY and 336th. If you close 336th you will eliminate a primary access point for my members to conduct business. After reviewing the Draft EIS and the potential negative effects for each site alternative, I support the Midway Landfill as the best location. Although cost is the highest, it will have the least impact on community and businesses as well as repurposing an otherwise dead piece of property in our community. Please consider my request as this project progresses. I would like a response. Thank you.
Rod Snyder

Online Open House Comment 87

Hello there- I run Federal Way Custom Jewelers- the oldest retailer in Federal Way. I have seen the changes and impacts of transit and am excited for light rail. That said, I have been very disappointed by some of the decisions, or lackthereof, by Sound Transit when it comes to OMF South. The obvious best choice for OMF South is the Midway Landfill site. This is unused space, that no one but the taxpayer could afford to make usable. Furthermore, the other options would have major impacts on local businesses and organizations and negatively impact our local economy. If the megachurch leaves, I lose clients on weekends. If Ellenos and the other businesses in the corporate park are forced to relocate, then those employees and high paying jobs go with them, and those are my clients too. Sound Transit is worried about cost- the Federal government is funding most of this project. I am sure there is more grant money available to clean up the environmental issues at midway. The south sound has repeatedly been taken advantage of- we have the most low wage workers, people of color, and commuters who could use the transit, yet we are getting light rail last, AFTER the north end and east side. So, do the right thing for the south sound this time, and make up for past transgressions. It will help get my future votes and support in favor of Sound Transit. I implore Sound Transit: spend the extra money, use the wasted space, clean up our local environment, and place the OMF south on the midway landfill.

Online Open House Comment 83

My business and livelihood is on the line . Northwest Equipment Sales and Rentals is positioned on the I5 corridor and Hwy 18. We employ approx 10 people . The location we purchased in 2003 was strategically situated for logistics since we haul heavy rental equipment up and down the I5 corridor. There is currently no property available that is zoned M2 or M3. This will have a devastating affect on our Business located at 2011 So 341st place in Federal Way . Please choose an alternate site like Christian Faith Center or the Midway landfill

From: Scott Halverson <scottssepticsevice@live.com>
Sent: Thursday, April 15, 2021 11:04 PM
To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>
Subject: Scott Halverson/ 24443 Pacific Highway S

Dear Sound Transit,

Thank you for taking time to speak with myself and my consultant, David Peterson, about the potential use acquisition/condemnation of my property located at 24443 Pacific highway S, Kent Wa 98032. I am the owner of this property (Race King LLC) and i currently run 2 businesses out of this location: My septic is my primary use of the property where i park my trucks and run my business as well as my racing business which is more of a hobby.

This property is slated to be part of the Midway Landfill alternative for the Operations and Maintenance Facility for the Light Rail System. My property has already been impacted in the past due to street widening and improvements along Pacific Highway. If my property were to be impacted any further by partial condemnation or easement, then it would essentially be unusable for my businesses, and market value of the property would be severely negatively impacted by any future owner. Having said that, I would be open to selling my property to Sound Transit as long as i could find a replacement property that would fit my business needs.

If Sound Transit does pick the Midway Alternative, then i look forward to further discussions about my property that would be a win-win for both parties.

Sincerely,
Scott Halverson
253-261-3453

From: greg olson <golson6@comcast.net>

Sent: Saturday, March 6, 2021 6:52 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Cc: golson6@comcast.net; 'Donna Olson' <donnaolson@comcast.net>; seabjorn@comcast.net

Subject: ST South Maintenance Facility - 344th Street option

Original communication comments, March 13, 2019 with updates to selected paragraphs for current conditions.

Site investigation committee,

Site Issues and background as they relate to 1910 South 344th Street and 1934 South 344th Street parcels, included in Option 344th Street:

- Donna and Greg Olson purchased, rezoned and developed the parcels in 1988/89. We installed water mains and sanitary sewer from locations on 344th Street near Garagetown allowing easy connection to future development on the specific surrounding properties. Our property is 2.93 useable acres.
- Donna and Greg Olson's trucking company, Evergone, Inc., operated its 100+ employee long haul postal contracting operation from the site from 1989 through 6/30/2008, our retirement.
- Donna and Greg Olson continue to own the parcels and have leased them to unrelated third parties since 7/1/2008. Each tenant since then has employed between 50-200 employees.
- The current tenant is Potelco, Inc, a wholly owned subsidiary of Quanta Services, an \$8 billion in annual sales firm that concentrates in power and energy transmission and repair across the USA.
- Potelco has a lease right to utilize our property until 7/31/2028. The "capitalized value of the lease payments", which is a primary determinant of property value in real estate, likely far exceeds your estimate of property value. Also, since our previous communication date with the site committee on March 13, 2019, both Potelco and us as landlords have made some significant capital expenditures to improve the property which would need to be calculated in a valuation.
- We would likely be at risk for significant legal costs should we be forced to terminate the current lease. Additionally, should Potelco attempt to terminate the lease due to uncertainty about remaining at our site we would also incur substantial legal costs and loss of our primary source of income, a significant factor in our financial position.
- Potelco utilizes this site as their primary south sound terminal for repair and construction activities. We were told our location provided them with strategic advantages in performing their contractual services to PSE.
- Donna and Greg Olson have been approached by numerous interested buyers since ownership and currently have an "offer to buy" awaiting our decision to accept should we choose to accept the current purchase offer. This buyer has verbally increased his offer by 12% since first made in writing and communicated to the site committee on March 13, 2019.
- As recent as mid-February 2021, it was communicated to Greg by two brokers from different firms that they had clients that would be interested in leasing our property, if available. It was stated that the characteristics of our property are becoming very scarce in the south sound. This is consistent with Greg's discovery during diligent review, since 2007, of the south sound properties with similar characteristics to ours, Greg has learned that the number of available parcels is dwindling, which has made our parcel considerably more desirable to possible tenants seeking such property characteristics: substantially all paved, fully fenced and secured, zoning compliant, approved and installed storm sewer system, proper installation of an oil/water separator utility, well maintained structure with excellent access to major freeways. It would be extremely difficult for us to locate and purchase a comparable property to what we have owned since 1988 and that provided the current rental income we receive.

- Additionally, we have been contacted in the last seven years by a developer for construction of a major hotel and a developer looking for a location for a mid to high level luxury condominium project. We enjoy one of the nicer views of Mt Rainier available in the Federal Way area. In our opinion a hotel or residential condo development would be a better future use for our property and consistent with the available retail businesses nearby.
- The companies which have utilized our property since 1989 have been a significant contributor to the economy of the City of Federal Way and the south sound.

Specific property characteristics:

- Our elevation is likely 40+ feet higher than Garagetown to the east; standing on our property it's easy to see over the roof of the Garagetown units. Btw, Garagetown units are ~60 individually owned units, not a "single owner" rental.
- Approximately 8-10' under the surface on our property we have struck extremely hard "glacial till soil" when installing our 12,000 gallon underground fuel tank (which remains on the site) and the Phase III test holes we have required of each prior tenant at the end of their lease term.
- The property is substantially paved with good quality asphalt, a fully operational and approved underground storm sewer system with associated catch basins. The property is fully fenced, contains a two story 6,400 sq ft, very well maintained office and shop structure. The fuel island and shop facility is connected to a maintained oil/water separator system before discharging into the sanitary sewer. All site systems and utilities were constructed under King Co, BALD guidelines as one of the final 17 developments in process when Federal Way became a city.

Surrounding properties:

- To the west of our property are located numerous single family homes, most of which are well maintained and of the lower price range for which are affordable for the current residents. It is very likely these residents would have a very difficult time securing alternate affordable housing. We believe these residences remain on septic however could be connected to sewer on 18th.
- To our north is the prior Trinity Broadcasting station tower, currently occupied by a religious organization/church. Also, to the north is the Insurepass/Intellipass office building which I believe is leased to various users.
- To our east is a location owned and utilized by Gene's Towing and the Garagetown complex with ~60 individual residential accessory property owners. It is my opinion these owners would find it very difficult to secure alternate facilities to what they currently own and in a similar proximity to their residences.
- To the south is the Walmart superstore and numerous retail and service businesses, locating a transit repair facility so close to those business seems to me to be an inconsistent use of our property and conflict with the goals of the City of Federal Way based upon our past discussions with city officials.

In conclusion I can be reached by email, phone or in person to discuss any of these, or additional issues as needed in the selection process.

Thank you,

Greg Olson
253-677-8961

Donna Olson
253-677-8962



DT: April 19, 2021

TO: Sound Transit Board

FR: Greater Federal Way Chamber of Commerce

Public Comment: Operations and Maintenance Facility South

The Greater Federal Way Chamber of Commerce continues to identify transportation infrastructure as a priority, recognizing the necessary investment of mass transit/light rail to meet the growing demands of a growing business community in the South Puget Sound region.

As an economic development focused organization, the Chamber recognizes Sound Transit's investment in the Federal Way area with the current construction of light rail stations at 320th Street and Highline College. As the strategic plan for light rail reaches further to the south, the proposed Operations and Maintenance Facility (OMF) South, becomes a critical component for expansion of the system.

The business leaders at that Chamber have reviewed the 24 proposed OMF South sites and ask the Sound Transit Board to note the guiding principles important to the Chamber of Commerce in their evaluation of the final three sites, as follows:

- Creation of permanent, sustainable living wage jobs;
- Minimum business displacement for existing jobs;
- Enhanced opportunities for transit-adjacent development;
- Impact of economic multipliers in the community;
- Environmental issues, including health concerns and the stewardship of resources such as wetlands and trails;
- Cost of strategic growth for transportation infrastructure.

The Chamber remains focused on the diversification of the economic base of Federal Way, including the maximum retention of commercial enterprises which provide the City with its tax base and within a range of industries from light manufacturing to minority-owned businesses.

In sum, the Greater Federal Way Chamber of Commerce encourages Sound Transit to determine the OMF South site based on what is most favorable to new and existing economic opportunities in our area.

Submitted on behalf of the business community at the Federal Way Chamber,

Rebecca Martin, CCE
President and CEO

WE IMPLORE YOU TO

PROTECT FEDERAL WAY

April 18, 2021

pac@protectfederalway.org
Protect Federal Way

Dear Sound Transit Board & EIS Team:

Thank you for your diligent work to study the three OMF South locations in greater detail in this Draft EIS. We the citizens of Federal Way, Kent, Auburn, and nearby south Sound communities appreciate the focus being placed on the impact from OMF South site decisions on our neighborhoods and people.

As we have seen in your Draft EIS, choosing the **South 344th Street** site would negatively impact the community in the following ways:

- The largest negative economic impacts on citizens and government
- The largest negative street and zoning impacts
- The largest negative wetland and stream impacts
- The largest negative property and relocation costs for Sound Transit
- The **greatest number of residential evictions at 79**
- The **greatest number of business evictions**, at 12 (and **we believe this is incorrectly low**, as that does not include small businesses in rented spaces and in unmarked spaces such as GarageTown. We consider this **25+ business evictions**).
- Three local churches (and we believe the **impact of relocating the FCC-licensed broadcast tower** for Trinity Broadcasting KTBW-TV **has not been considered** in the Draft EIS)
- The **greatest number of jobs lost at 248**.

In addition to these serious impacts to homes, jobs, and lives in our community, we also think the **Draft EIS does not address these additional concerns** about the South 344th Street site:

- The **increased relocation costs** for business owners and tenants of industrial buildings in the South 344th Street site. Dismantling and transporting industrial equipment such as the Ellenos Yogurt plant, vehicle lifts in auto shops and at

Garage Town, the KTBW-TV broadcast tower, and numerous others represent significant additional relocation costs that, while not part of the Draft EIS scope, should be considered as incremental additional costs of selecting this site.

- **Comparable properties for relocation** of businesses have not been priced. There are not viable properties in the Federal Way community or indeed anywhere within 20+ miles of the South 344th Street site to relocate many of these businesses. As this is the last industrial zone in Federal Way, choosing this site **immediately evicts all industrial businesses from Federal Way, permanently**. Obtaining license to relocation the KTBW-TV broadcast tower will be much more complex and costly than simply finding a new plot of land. Obtaining properties comparable to the GarageTown complex will be significantly more expensive (we estimate 2x-3x) than the current tax value of those properties. The true cost of choosing the South 344th Street site will be borne later, by the Sound Transit relocation committee, but **it is misleading not to include an estimate of that cost** when evaluating and selecting a site.
- The **true business costs of relocation**. Many small businesses asked by Sound Transit to relocate will simply fold and the jobs they represent will evaporate as the toll of relocation will overburden them. For example, the Ellenos Yogurt operation would need to build a duplicate facility in another location and shift all their manufacturing capacity before the existing facility could be dismantled, meaning the several multi-million-dollar investments made in their current property would need to be repeated. Businesses like Ellenos would be **faced with huge capital expenses not covered by Sound Transit that have no long-term gain to their business**. Every business targeted by relocation would be forced to make the same difficult decisions, and many will fold under the extreme burden.

Sound Transit has provided many opportunities for citizens to speak on this issue and share concerns and views with the Sound Transit Board and the Sound Transit teams. As citizens, we have shared with Sound Transit our view that choosing the South 344th Street site represents too great a cost to Federal Way to be considered viable.

- **465 citizens have signed paper and online petitions** that have been submitted to Sound Transit
- More than 45 individual citizens have sent specific comments into the Draft EIS process.

- Citizens have attended Sound Transit presentations and Sound Transit Board meetings to share these concerns.
- Citizens have also attended Federal Way City Council meetings to share concerns with Federal Way council members and ask for help.

For yourselves on the Sound Transit Board and Sound Transit planning teams, if there was any doubt which of the three remaining OMF South sites had the highest costs for citizens, businesses, and the community, these voices should have made it quite clear: **the South 344th Street Site is the most painful and costly choice for everyone.** On behalf of all of us, please preserve homes, jobs, businesses, and the future of Federal Way by removing this site from further consideration.

Thank you for your empathetic and logical decision.

Brian Nash

Chair, Protect Federal Way

A Federally-registered nonconnected Political Action Committee, EIN 84-3663586

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APPENDIX C

Public Comments

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Sound Transit Projects - Communications (247 Total)



Date Received

from 3/1/2021

Communication ID: 471146 - Hi there!

Communication (3/5/2021)

Hi there!

From: Diana Noble-Gulliford <dnoblegulliford@gmail.com>

Sent: Friday, March 5, 2021 1:22 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Hi There!

I'm so glad that this is finally out.

Please send me a link or send me via email the actual draft EIS, not the executive summary.

Thanks,

Diana

Owner(s):

Contact ID	Name	Type	Phones	Email
1023388	Diane Noble-Gulliford	Individual		dnoblegulliford@gmail.com

Communication ID: 471147 - OMFS DEIS comments

Communication (3/5/2021)

OMFS DEIS comments

From: Eric <ericcallahan98@gmail.com>

Sent: Friday, March 5, 2021 1:27 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMFS DEIS comments

The Midway landfill is the best possible location for OMFS. The OMF, an industrial operations and maintenance facility benefiting the public would be the best possible use for this vacant, superfund designated public land. Who better to utilize and manage and steward the risks than an tax funded agency!? The minimal impact at midway landfill to the cities, businesses, residents, and environmental concerns compared to the other 2 alternatives justifies the increased cost of construction. Provided sound transit is better stewards of taxpayer dollars than their history demonstrates... there is no reason to negatively impact more people, up end more jobs, homes, lives, tax base, multiple roads and a church. All while having greater environmental impacts in disturbing riparian zones. Tax payers are already being bled dry, despite our votes for cheaper taxes, you argued eyeman duped us. Ironic since you duped us all into voting for the absurdly expensive program you consistently fail at keeping in budget... Pot...kettle... but, since you've managed to maintain the outrageous taxes on us despite our votes... The least you could do is eminent domain as few businesses and peoples homes as possible through this process. The skilled trade and support staff jobs being created by OMFS do not replace the jobs you will otherwise take from people. Your appraisal value offers are garbage compared to an actual fair market value people could make if they sold their homes or businesses fairly without threat of being eminent domained. Not to mention demolishing pillars of the local community. (Churches)

All options considered, all costs and benefits weighed, midway land fill needs to be selected as the best possible location for the OMFS. It is lowest overall impact and is the only option not requiring additional aerial main line extensions just to be put into service.

Owner(s):

Contact ID	Name	Type	Phones	Email
875487	Eric Callahan	Individual		Ericcallahan98@gmail.com - callah16@seattleu.edu

Communication ID: 471148 - Why not the huge empty treeless property

Communication (3/9/2021)

Why not the huge empty treeless property

From: John Thompson <harleydog.jt@gmail.com>

Sent: Tuesday, March 9, 2021 2:57 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject:

Why not the huge empty and treeless
Property by I 5 and north
Of the empty Whehauser property
Sorry about the spellin

Owner(s):

Contact ID	Name	Type	Phones	Email
1023795	John Thompson	Individual		harleydog.jt@gmail.com

Communication ID: 471149 - Proposed Sound Transit Maintenance Facility (Kent and/or Federal Way).

Communication (3/9/2021)

Proposed Sound Transit Maintenance Facility (Kent and/or Federal Way)

From: Scott Candler <candlerconsulting@comcast.net>

Sent: Tuesday, March 9, 2021 4:04 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Proposed Sound Transit Maintenance Facility (Kent and/or Federal Way)

This project is looking for comments prior to April 19th.
Has a design team been selected for this project and if so, who are the lucky folks?
Scott Candler, P.E.
Candler Consulting
10 Creekwood Lane SW
Lakewood, WA 98499
Phone: 253-581-2198
Fax: 253-588-4230

Owner(s):

Contact ID	Name	Type	Phones	Email
1023796	Scott Candler	Individual	+1 (253) 581-2198	candlerconsulting@comcast.net

Communication ID: 471150 - Our recommended alternative choice

Communication (3/9/2021)

Our recommended alternative choice

From: Michele Mendia-Gonzalez <michelleg_76@hotmail.com>

Sent: Tuesday, March 9, 2021 7:11 PM

To: Email The Board <EmailTheBoard@soundtransit.org>; OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Our recommended alternative choice

Greetings,
Thank you for the mailings asking for our feedback. We recommend to build the OMF South Train yard in the old landfill site.
Thank you!
Michele and Brian Mendia
253-329-0975

Owner(s):

Contact ID	Name	Type	Phones	Email
963075	Brian Mendia	Individual		brianmendia@yahoo.com
1023797	Michele Mendia-Gonzalez	Individual		michelleg_76@hotmail.com

Communication ID: 471151 - Midway landfill option

Communication (3/13/2021)

Midway landfill option

From: Dale Menchhofer <dalemench@comcast.net>

Sent: Saturday, March 13, 2021 11:45 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Midway landfill option

The Midway Landfill option costs more than the other two options, and that is sufficient reason to be opposed to it. I want transit money to be spent on transit benefits, and any benefits of the Midway Landfill site do not benefit transit. With the budget so strained by the pandemic, we cannot afford to spend money unnecessarily. Although the other two options do require expending money to construct track further south, that has a transit benefit.

Owner(s):

Contact ID	Name	Type	Phones	Email
866680	Dale Menchhofer	Individual	+1 (206) 547-4736 +1 (206) 697-3282	dalemench@comcast.net

Communication ID: 471153 - Concerning the OMF South & S 344th St Federal Way

Communication (3/5/2021)

Concerning the OMF South & S 344th St Federal Way

From: KDub <kingfisherinwa@gmail.com>

Sent: Friday, March 5, 2021 10:11 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Job impacts and tax base shifts are critically important to property owners and the City of Federal Way. Given the relatively small number of property owners (<100) in all three alternative sites, why was a potentially inaccurate estimating approach based on square footage of buildings used to estimate number of jobs impacted? Would not a simple and direct survey of the property owners yield higher quality data for counting actual on-premise employees? I respectfully submit that for the cost of postage stamps an unnecessary and critical ambiguity in the Draft EIS can be remedied.

With construction costs essentially the same for the two Federal Way alternatives, please don't rely on unnecessarily imprecise estimates for jobs impacted— especially when the actual job impact can be readily determined.

I also respectfully submit that treating GarageTown as a single entity in Draft EIS summary tables detracts from the fair and accurate comparison these tables are intended to provide. Please eliminate the use of footnotes in the Draft EIS that tend to bury the relative weight and interests of 60 distinct GarageTown property owners. Those 60 discrete property owners should be shown directly in the summary tables. Everyone of those owners uses their property for a residential garage or a business location. In assessing the magnitude of impacts to properties, the inclusion of GarageTown as a single property in the Draft EIS is inaccurate and misleading. Unfortunately both of these two deficiencies in the Draft EIS work to underrepresent the true burden to S 344th site property owners and the community. Given the Draft EIS suggests the relocation options for Garage Town owners are extremely limited I encourage the Board to request a more complete comparison of all property ownership and actual job impacts across all three alternative sites. Thank you. Teresa Wagner

Owner(s):

Contact ID	Name	Type	Phones	Email
1023800	Teresa Wagner	Individual		kingfisherinwa@gmail.com - tdubinwa@gmail.com

Communication ID: 471154 - Concerning the OMF South & S 344th St Federal Way

Communication (3/5/2021)

Concerning the OMF South & S 344th St Federal Way

From: Kurt Wagner <kdubinwa@me.com>

Sent: Friday, March 5, 2021 10:12 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Job impacts and tax base shifts are critically important to property owners and the City of Federal Way. Given the relatively small number of property owners (<100) in all three alternative sites, why was a potentially inaccurate estimating approach based on square footage of buildings used to estimate number of jobs impacted? Would not a simple and direct survey of the property owners yield higher quality data for counting actual on-premise employees? I respectfully submit that for the cost of postage stamps an unnecessary and critical ambiguity in the Draft EIS can be remedied.

With construction costs essentially the same for the two Federal Way alternatives, please don't rely on unnecessarily imprecise estimates for jobs impacted— especially when the actual job impact can be readily determined.

I also respectfully submit that treating GarageTown as a single entity in Draft EIS summary tables detracts from the fair and accurate comparison these tables are intended to provide. Please eliminate the use of footnotes in the Draft EIS that tend to bury the relative weight and interests of 60 distinct GarageTown property owners. Those 60 discrete property owners should be shown directly in the summary tables. Everyone of those owners uses their property for a residential garage or a business location. In assessing the magnitude of impacts to properties, the inclusion of GarageTown as a single property in the Draft EIS is inaccurate and misleading. Unfortunately both of these two deficiencies in the Draft EIS work to underrepresent the true burden to S 344th site property owners and the community. Given the Draft EIS suggests the relocation options for Garage Town owners are extremely limited I encourage the Board to request a more complete comparison of all property ownership and actual job impacts across all three alternative sites. Thank you. Cole Wagner

Owner(s):

Contact ID	Name	Type	Phones	Email
1023801	Cole Wagner	Individual		kdubinwa@me.com

Communication ID: 471155 - Concerning the OMF South & S 344th St Federal Way

Communication (3/5/2021)

Concerning the OMF South & S 344th St Federal Way

From: Kurt Wagner <kdubinwa@gmail.com>

Sent: Friday, March 5, 2021 10:11 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Job impacts and tax base shifts are critically important to property owners and the City of Federal Way. Given the relatively small number of property owners (<100) in all three alternative sites, why was a potentially inaccurate estimating approach based on square footage of buildings used to estimate number of jobs impacted? Would not a simple and direct survey of the property owners yield higher quality data for counting actual on-premise employees? I respectfully submit that for the cost of postage stamps an unnecessary and critical ambiguity in the Draft EIS can be remedied.

With construction costs essentially the same for the two Federal Way alternatives, please don't rely on unnecessarily imprecise estimates for jobs impacted— especially when the actual job impact can be readily determined.

I also respectfully submit that treating GarageTown as a single entity in Draft EIS summary tables detracts from the fair and accurate comparison these tables are intended to provide. Please eliminate the use of footnotes in the Draft EIS that tend to bury the relative weight and interests of 60 distinct GarageTown property owners. Those 60 discrete property owners should be shown directly in the summary tables. Everyone of those owners uses their property for a residential garage or a business location. In assessing the magnitude of impacts to properties, the inclusion of GarageTown as a single property in the Draft EIS is inaccurate and misleading. Unfortunately both of these two deficiencies in the Draft EIS work to underrepresent the true burden to S 344th site property owners and the community. Given the Draft EIS suggests the relocation options for Garage Town owners are extremely limited I encourage the Board to request a more complete comparison of all property ownership and actual job impacts across all three alternative sites.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1023802	Kurt Wagner	Individual		kdubinwa@me.com

Communication ID: 471157 - OMF South Site

Communication (3/9/2021)

OMF South Site

From: Tony Tony Tony <tonylinc@yahoo.com>

Sent: Tuesday, March 9, 2021 2:50 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: OMF South Site

To Whom it May Concern,
The Midway Landfill site is the ONLY one that makes sense.
Please do not use any other site!!!
The other two choices destroy jobs, homes, and make no sense.
Please, use the Midway Landfill site.
This will be the best choice for all of us.
Thank you,
Concerned Citizen/Taxpayer

Owner(s):

Contact ID	Name	Type	Phones	Email
1023804	Tony.	Individual		tonylinc@yahoo.com

Communication ID: 471159 - Concerning the OMF South & S 344th St Federal Way

Communication (3/8/2021)

Concerning the OMF South & S 344th St Federal Way

From: P K <kobzarpeter@hotmail.com>

Sent: Monday, March 8, 2021 9:24 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1023805	Peter Kobzar	Individual		kobzarpeter@hotmail.com

Communication ID: 471164 - Placement of repair/storage facility

Communication (3/8/2021)

Placement of repair/storage facility

From: steven Lander <dcimal2@hotmail.com>

Sent: Monday, March 8, 2021 8:58 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Placement of repair/storage south facility

Regarding the placement of the south repair/storage facility:

Please place it at the Mldway landfill site.

There is currently work being done near there now and you should be able to start coordination with it. If you do not use it, then the site will sit empty and unused. It's the most logical place. Further the mis-placement and degradation of the other areas you propose are a detriment to the area.

Thank you,

S

The poor decisions in your past, and you supposedly being deceived are not forgotten

Owner(s):

Contact ID	Name	Type	Phones	Email
1023811	Steven Lander	Individual		dcimal2@hotmail.com

Communication ID: 471166 - Concerning the OMF South & S 344th St Federal Way

Communication (3/8/2021)

Concerning the OMF South & S 344th St Federal Way

From: Ian Nagy <nolansdaddy82@gmail.com>

Sent: Monday, March 8, 2021 3:28 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thus being said, sound transit is a waste of tax payers money.

Thank you.

Respectfully,

Ian Nagy

Owner(s):

Contact ID	Name	Type	Phones	Email
1023813	Ian Nagy	Individual		nolansdaddy82@gmail.com

Communication ID: 471167 - Concerning the OMF South & S 344th St Federal Way

Communication (3/6/2021)

Concerning the OMF South & S 344th St Federal Way

From: hughes.allen@gmail.com <hughes.allen@gmail.com>

Sent: Saturday, March 6, 2021 6:52 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Allen Hughes

Sent from my iPhone

Owner(s):

Contact ID	Name	Type	Phones	Email
879203	Allen Hughes	Individual		hughes.allen@gmail.com

Communication ID: 471169 - (1) Concerning the OMF South & S 344th St Federal Way

Communication (3/5/2021)

(1) Concerning the OMF South & S 344th St Federal Way

From: Peter Broda <md11skipper@me.com>

Sent: Friday, March 5, 2021 9:12 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Peter Broda

Garage Town A7

Sent from my iPad

Owner(s):

Contact ID	Name	Type	Phones	Email
1023814	Peter Broda	Individual		md11skipper@me.com

Communication ID: 471171 - Concerning the OMF South & S 344th St Federal Way

Communication (3/5/2021)

Concerning the OMF South & S 344th St Federal Way

From: Lisa Kittilsby <lisak@gravelpits.com>

Sent: Friday, March 5, 2021 6:30 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Lisa Kittilsby

Owner(s):

Contact ID	Name	Type	Phones	Email
1023029	Lisa Kittilsby	Individual		lisak@gravelpits.com

Communication ID: 471172 - Concerning the OMF South & S 344th St Federal Way

Communication (3/5/2021)

Concerning the OMF South & S 344th St Federal Way

From: Brian Nash <schuss@me.com>

Sent: Friday, March 5, 2021 5:36 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood. These jobs and homes and the work of these entrepreneurs MUST be worth something to us, right?

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.
- Brian Nash

Owner(s):

Contact ID	Name	Type	Phones	Email
940421	Brian Nash	Individual		pac@protectfederalway.org

Communication ID: 471304 - Choice of location

Communication (3/16/2021)

Choice of location

From: LINDA SIMS <lindagsims@comcast.net>

Sent: Tuesday, March 16, 2021 11:21 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: choice of location

I am a big supporter of public transportation and of Sound Transit's efforts to provide this service to the Puget Sound Area. I live in Federal Way, WA, and I am excited to see the changes in progress.

I have received information about the upcoming choices of location for the South train yard, and I am writing to submit my opinion on this. Of the three choices outlined in the information from Protect Federal Way, I would strongly choose the Midway Landfill location. The other two choices (S. 344th St. and S. 336th St.) are very close to my home and other homes which would be impacted by the noise. Facilities like this should not be near to homes, schools, offices, green spaces, streams and lakes, due to noise and industrial pollution. I would hope that the clearing of homes, business and churches would render those choices off limits. I urge you to choose the Midway Landfill location for these reasons.

Thank you kindly,
Linda Sims

Owner(s):

Contact ID	Name	Type	Phones	Email
1024126	Linda Sims	Individual		lindagsims@comcast.net

Communication ID: 471305 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/10/2021)

Concerning the OMF South & S 344th St Federal Way

From: Michelle Biga <michelle.bigga@fosswaterwayseaport.org>
Sent: Wednesday, March 10, 2021 4:26 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1024127	Michelle Biga	Individual		michelle.bigga@fosswaterwayseaport.com

Communication ID: 471306 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/11/2021)

Concerning the OMF South & S 344th St Federal Way

From: Diana Haines <dianahaines47@gmail.com>
Sent: Thursday, March 11, 2021 3:46 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

It should be the old dumpsite. Best pick for environment and the life of Federal Way

Owner(s):

Contact ID	Name	Type	Phones	Email
1024128	Diana Haines	Individual		dianahaines47@gmail.com

Communication ID: 471307 - Concerning the OMF South & S 344th St Federal Way

Communication (3/11/2021)

Concerning the OMF South & S 344th St Federal Way

From: Sue Walker <suewalker2@msn.com>
Sent: Thursday, March 11, 2021 3:57 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Sue Walker
Federal Way

Owner(s):

Contact ID	Name	Type	Phones	Email
1024129	Sue Walker	Individual		suewalker2@msn.com

Communication ID: 471308 - Concerning the OMF South & S 344th St Federal Way

Communication (3/15/2021)

Concerning the OMF South & S 344th St Federal Way

From: Rod Smith <rod.smith@restoration1.com>
Sent: Monday, March 15, 2021 5:29 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1024130	Rod Smith	Individual		rod.smith@restoration1.com

Communication ID: 471309 - Concerning the OMF South & S 344th St Federal Way

Communication (3/15/2021)

Concerning the OMF South & S 344th St Federal Way

From: Brendan Garcila <brendangarcila@gmail.com>
Sent: Monday, March 15, 2021 5:38 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Sent from my iPhone

Owner(s):

Contact ID	Name	Type	Phones	Email
1024131	Brendan Garcila	Individual		brendangarcila@gmail.com

Communication ID: 471311 - Concerning the OMF South & S 344th St Federal Way

Communication (3/15/2021)

Concerning the OMF South & S 344th St Federal Way

From: Helen Pelton <>walking99@comcast.net>
Sent: Monday, March 15, 2021 7:00 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Sent from my iPhone

Owner(s):

Contact ID	Name	Type	Phones	Email
1024132	Helen Pelton	Individual		walking99@comcast.net

Communication ID: 471312 - Concerning the OMF South & S 344th St Federal Way

Communication (3/15/2021)

Concerning the OMF South & S 344th St Federal Way

From: Kevin Wilson <kdwilson148@gmail.com>
Sent: Monday, March 15, 2021 7:51 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Kevin Wilson
Federal Way
Full Time Public Transit Commuter

Owner(s):

Contact ID	Name	Type	Phones	Email
1024133	Kevin Wilson	Individual		kdwilson148@gmail.com

Communication ID: 471313 - Concerning the OMF South & S 344th St Federal Way

Communication (3/16/2021)

Concerning the OMF South & S 344th St Federal Way

From: Brad Lewis <bradlewis2013@icloud.com>
Sent: Tuesday, March 16, 2021 10:45 AM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Sent from my iPhone

Owner(s):

Contact ID	Name	Type	Phones	Email
1024134	Brad Lewis	Individual		bradlewis2013@gmail.com

Communication ID: 471314 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/16/2021)

Concerning the OMF South & S 344th St Federal Way

From: Monica Guthrie <bguthrie60@icloud.com>
Sent: Tuesday, March 16, 2021 1:46 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
963181	Monica Guthrie	Individual		meguthrie43@gmail.com

Communication ID: 471315 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/15/2021)

Concerning the OMF South & S 344th St Federal Way

From: Brendan Garcila <59761@p12fwps.org>
Sent: Monday, March 15, 2021 5:39 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1024131	Brendan Garcila	Individual		brendangarcila@gmail.com

Communication ID: 471611 - Midway Landfill

Communication (3/17/2021)

Midway Landfill

From: Derick Cardenas <derickcardenas71@gmail.com>

Sent: Wednesday, March 17, 2021 11:20 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: RE:Midway Landfill

Dear Sound Transit Board,
Many of us would like to see a light rail go to Federal Way. However, land is very scarce in this area. Wouldn't it make a lot more sense to use an old landfill instead of destroying churches, neighborhoods, and small businesses?
Please use some common sense. And please do not speak to me of costs and funding. Your arguments would just sound hypocritical.
Most Sincerely,
Frederick Daniel Cardenas

Owner(s):

Contact ID	Name	Type	Phones	Email
1024764	Frederick Cardenas	Individual		derickcardenas71@gmail.com

Communication ID: 471613 - OMF South Train

Communication (3/17/2021)

OMF South Train

From: Jutta <josionek@yahoo.com>

Sent: Wednesday, March 17, 2021 7:09 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: OMF South Train

Hello,
Please do not build a OMF South Train in my backyard. I live in Federal Way. Please use the Midway Landfill instead. We already have a lot changing due to the light rail being brought to Federal in 2022. Please follow the option that does not destroy houses or jobs(i.e. 334th nor 336th). Instead use Midway Landfill option.
Thank you,
-J. Josionek

Owner(s):

Contact ID	Name	Type	Phones	Email
1024765	Jutta Josionek	Individual		josionek@yahoo.com

Communication ID: 471614 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/18/2021)

Concerning the OMF South & S 344th St Federal Way

From: Kay Stinson <kayandgrace@yahoo.com>

Sent: Thursday, March 18, 2021 5:05 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board, I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood. Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community. Thank you.
Susan Kay Chung
Resident of Federal Way since 2005
253-332-7805

Owner(s):

Contact ID	Name	Type	Phones	Email
1024767	Susan Chung	Individual		kayandgrace@yahoo.com

Communication ID: 471615 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/18/2021)

Concerning the OMF South & S 344th St Federal Way

From: Camile Wilson <camilew@gmail.com>

Sent: Thursday, March 18, 2021 7:29 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,
I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood. Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community. Thank you.
Camile J Wilson

Owner(s):

Contact ID	Name	Type	Phones	Email
1024768	Camile Wilson	Individual		camilew@gmail.com

Communication ID: 471616 - Concerning the OMF South & S 344th St Federal Way

Communication (3/18/2021)

Concerning the OMF South & S 344th St Federal Way

From: Kurt Wagner <kdubinwa@gmail.com>

Sent: Thursday, March 18, 2021 4:10 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

Dick's Drive Inn was previously eliminated from consideration as an alternative site due to public perception and negative impacts. Please now eliminate the S. 344th for the same exact same reasons. Of the three alternatives It is the highest negative impacts to property owners, City of Federal Way and local employees who will lose their jobs.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Kurt Wagner

Documents: thumbnail_image006.jpg

Owner(s):

Contact ID	Name	Type	Phones	Email
1023802	Kurt Wagner	Individual		kdubinwa@me.com

Communication ID: 471617 - Concerning the OMF South & S 344th St Federal Way

Communication (3/18/2021)

Concerning the OMF South & S 344th St Federal Way

From: ctowle <ctowle@mindspring.com>

Sent: Thursday, March 18, 2021 4:25 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Carolyn Towle

Owner(s):

Contact ID	Name	Type	Phones	Email
1024769	Carolyn Towle	Individual		ctowle@mindspring.com

Communication ID: 471618 - Light rail maintenance yard

Communication (3/18/2021)

Light rail maintenance yard

From: Cole Wagner <colelc150@gmail.com>

Sent: Thursday, March 18, 2021 5:01 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Light rain maintenance yard

Members of the Sound Transit Board,

Dick's Drive Inn was previously eliminated from consideration as an alternative site due to public perception and negative impacts. Please now eliminate the S. 344th for the same exact same reasons. Of the three alternatives It is the highest negative impacts to property owners, City of Federal Way and local employees who will lose their jobs.

The negative impacts for each alternative site as documented by your own Draft EIS Statement are summarized here.

As you can see S 344th site has the most negative impacts by a very large margin. Please eliminate the S. 344th from further consideration. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1023801	Cole Wagner	Individual		kdubinwa@me.com

Communication ID: 471619 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/19/2021)

Concerning the OMF South & S 344th St Federal Way

From: Maria Hug <mariahug@comcast.net>

Sent: Friday, March 19, 2021 6:21 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Maria Russell

Sent from my iPhone

Owner(s):

Contact ID	Name	Type	Phones	Email
950849	<u>Maria Russell</u>	Individual	+1 (360) 402-4171 (Cell) +1 (877) 333-4799 (Work) +1 (360) 252-8829 (Fax)	<u>Maria@wabenjerry.com</u> - <u>catering@wabenjerry.com</u>

Communication ID: 471620 - Concerning the OMF South & S 344th St Federal Way

Communication (3/19/2021)

Concerning the OMF South & S 344th St Federal Way

From: Steve Wilson <jamesislandfish@gmail.com>

Sent: Friday, March 19, 2021 6:54 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,
I wish to register my objection as a citizen to including the S 344th St site in Federal Way as a consideration for your OMF South facility. Selecting this site would eliminate over 250 jobs from the community, evict several small churches, level a neighborhood of affordable homes, and erase the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the landfill site instead of this one. I looking forward to light rail service in Federal Way and trust you to make the right decision for our community.

Thank you.

Sent from Mail for Windows 10

Owner(s):

Contact ID	Name	Type	Phones	Email
1024771	Steve Wilson	Individual		jamesislandfish@gmail.com

Communication ID: 471621 - OMF South

Communication (3/19/2021)

OMF South

From: falcon635@comcast.net <falcon635@comcast.net>

Sent: Friday, March 19, 2021 10:56 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: OMF South

I say go with the 336th site.

Owner(s):

Contact ID	Name	Type	Phones	Email
1024772		Individual		falcon635@comcast.net

Communication ID: 471622 - Light rail maintenance yard

Communication (3/19/2021)

Light rail maintenance yard

From: Teresa Wagner <tdubinwa@gmail.com>

Sent: Friday, March 19, 2021 5:13 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Light Rail maintenance Yard

Members of the Sound Transit Board,

Dick's Drive Inn was previously eliminated from consideration as an alternative site due to public perception and negative impacts. Please now eliminate the S. 344th for the same exact same reasons. Of the three alternatives It is the highest negative impacts to property owners, City of Federal Way and local employees who will lose their jobs.

The negative impacts for each alternative site as documented by your own Draft EIS Statement are summarized here.

As you can see S 344th site has the most negative impacts by a very large margin. Please eliminate the S. 344th from further consideration. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
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1023800	Teresa Wagner	Individual		kingfisherinwa@gmail.com - tdubinwa@gmail.com
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Communication ID: 471623 - Please eliminate S 344th from consideration

Communication (3/20/2021)

Please eliminate S 344th from consideration

From: Ruth Erickson <ericksonruth@hotmail.com>

Sent: Saturday, March 20, 2021 2:42 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Please eliminate S 344th from consideration

Members of the Sound Transit Board,

Dick's Drive Inn was previously eliminated from consideration as an alternative site due to public perception and negative impacts. Please now eliminate the S. 344th for the exact same reasons. Of the three alternatives It is the highest negative impacts to property owners, City of Federal Way and local employees who will lose their jobs.

The negative impacts for each alternative site as documented by your own Draft EIS Statement are summarized here.

As you can see S 344th site has the most negative impacts by a very large margin. Please eliminate the S. 344th from further consideration. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Ruth Erickson

Owner(s):

Contact ID	Name	Type	Phones	Email
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1024774	Ruth Erickson	Individual		ericksonruth@hotmail.com
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Communication ID: 471624 - light rail maintenance yard location

Communication (3/20/2021)

light rail maintenance yard location

From: Shawn Erickson <shawngerickson@msn.com>

Sent: Saturday, March 20, 2021 2:49 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: light rail maintenance yard location

Members of the Sound Transit Board,

Dick's Drive Inn was previously eliminated from consideration as an alternative site due to public perception and negative impacts. Please now eliminate the S. 344th for the same exact same reasons. Of the three alternatives It is the highest negative impacts to property owners, City of Federal Way and local employees who will lose their jobs.

The negative impacts for each alternative site as documented by your own Draft EIS Statement are summarized here.

As you can see S 344th site has the most negative impacts by a very large margin. Please eliminate the S. 344th from further consideration. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.
Shawn G. Erickson

Owner(s):

Contact ID	Name	Type	Phones	Email
1024775	Shawn Erickson	Individual		shawngerickson@gmail.com

Communication ID: 471625 - Concerning the OMF South & S 344th St Federal Way

Communication (3/21/2021)

Concerning the OMF South & S 344th St Federal Way

From: Jerry Carr <jerry.carr@gmail.com>

Sent: Sunday, March 21, 2021 8:10 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
886919	Jerry A Carr	Individual		jerry.carr@gmail.com - jerry.carr@outlook.com

Communication ID: 471626 - Midway landfill

Communication (3/22/2021)

Midway landfill

From: CenturyLink Customer <jsharlock@q.com>

Sent: Monday, March 22, 2021 12:10 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Midway landfill

Dear Board members of the Sound Transit
When it comes to picking a site for the maintenance center i would consider the Midway landfill
I know the cost would be greater, but the transit maintenance center would be considered an
industrial
site with a rail yard and maintenance buildings. This site would fit in with current business that
currently surround
that area. It is a site that would displaced less current established businesses.
The longer we wait on doing something with this landfill property the more expensive it will be.
Thank You
Jack & Julie Sharlock

Owner(s):

Contact ID	Name	Type	Phones	Email
1024777	Jack Sharlock	Individual		jsharlock@q.com
1024778	Julie Sharlock	Individual		

Communication ID: 471628 - South 344th Site

Communication (3/23/2021)

South 344th Site

From: Doug Wagner <douglasjwagner@hotmail.com>

Sent: Tuesday, March 23, 2021 7:59 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: South 344th Site

Members of the Sound Transit Board,

Dick's Drive Inn was previously eliminated from consideration as an alternative site due to public perception and negative impacts. Please now eliminate the S. 344th for the same exact same reasons. Of the three alternatives It is the highest negative impacts to property owners, City of Federal Way and local employees who will lose their jobs.

The negative impacts for each alternative site as documented by your own Draft EIS Statement are summarized here. [attached]

Sincerely,
Doug Wagner
425-864-7280

Documents: thumbnail_image006.jpg
thumbnail_image001.png

Owner(s):

Contact ID	Name	Type	Phones	Email
1024779	Doug Wagner	Individual		douglasjwagner@hotmail.com

Communication ID: 471629 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/23/2021)

Concerning the OMF South & S 344th St Federal Way

From: Darren McDonald <darren.g.mcdonald@gmail.com>

Sent: Tuesday, March 23, 2021 11:39 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Turning the Midway Landfill into a useful piece of land again would be a win for everyone involved.

Thank you.

Darren McDonald

Owner(s):

Contact ID	Name	Type	Phones	Email
1024780	Darren McDonald	Individual		darren.g.mcdonald@gmail.com

Communication ID: 471733 - (1) OMF South public comment

Communication (3/24/2021)

(1) OMF South public comment

From: Ken Broyles <aog9354@yahoo.com>
Sent: Wednesday, March 24, 2021 8:23 AM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: OMF South

I have walked around site 10A talking to businesses & home owners. Some of the businesses have been there for many years & are family owned. A lot of the homes within site 10A have been there for many years. It's also this is the only industrial site the Federal Way has. Elleno's has a huge business within site 10A that has put millions of dollars into it with improvements. They have many employees working there making the worlds best yogurt. I'm an owner within site 10A that Sound Transit is considering for the OMF facility. I'm one of the owners at GarageTown which is an extension of my home. GarageTown is not just another storage facility. I have spent a lot of time & money with improvements in my garage over the years. It is and has been a place where my Grandkids have learned to work on projects and old cars that I own. They always love to come to Grandpa's garage & learn how to work on projects. Sense schools have no classes to teach them wood working, metal shop & automobile mechanics like they had when I grew up. This is teaching them and getting them ready for life after high school or college. There are 67 garages within GarageTown with 57 owners. Within GarageTown there are some businesses that have employees. If Tacoma can make the Asarco site on the waterfront in to a beautiful and functional place, why can't Sound Transit do the same with the Midway landfill site. Building the OMF site at the Midway landfill would have the least amount of heartbreak for all the citizens in Federal Way. Thank you for your time, Ken Broyles

Owner(s):

Contact ID	Name	Type	Phones	Email
890500	Ken Broyles	Individual	253-312-5603	aog9354@yahoo.com

Communication ID: 471734 - (1) Concerning the OMF South & S 344th St Federal Way

Communication (3/24/2021)

(1) Concerning the OMF South & S 344th St Federal Way

From: Peter Broda <md11skipper@yahoo.com>
Sent: Wednesday, March 24, 2021 8:58 AM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

CAUTION: This email originated from a contact outside Sound Transit. Remember, do not click any links or open any attachments unless you recognize the sender and know the content is safe. Report any suspicious email by clicking the "fish" button in Outlook. Thank you! ST Information Security

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Peter Broda

Sent from my iPhone

Owner(s):

Contact ID	Name	Type	Phones	Email
1023814	Peter Broda	Individual		md11skipper@me.com

Communication ID: 471789 - (2) Concerning the OMF South & S 344th St Federal Way

Communication (3/16/2021)

(2) Concerning the OMF South & S 344th St Federal Way

Subject Re: Concerning the OMF South & S 344th St Federal Way
From Rod Smith
To Email The Board
Sent Tuesday, March 16, 2021 2:49 PM

I'm not voting for S 344. I did not find where I could pick a location. I would have voted for Midway Landfill
Rod Smith

Owner(s):

Contact ID	Name	Type	Phones	Email
1024130	Rod Smith	Individual		rod.smith@restoration1.com

Communication ID: 471791 - Public comment on OMF South train yard

Communication (3/21/2021)

Public comment on OMF South train yard

Subject OMF South train yard
From CenturyLink Customer
To Email The Board
Sent Sunday, March 21, 2021 10:53 AM

Hello,
WHY would you choose to displace small businesses, destroy 14 homes (when there are not enough affordable home right now), and take away jobs from people who need them?
Can you think beyond profit and ease of your jobs?
Put the train yard on the landfill site where no one lives and no businesses are operating!!
Vickie Price
Federal Way

Owner(s):

Contact ID	Name	Type	Phones	Email
1025163	Vicky Price	Individual		vprice@q.com

Communication ID: 471796 - Public comment concerning the OMF South & S 344th St Federal Way

Communication (3/23/2021)

Public comment concerning the OMF South & S 344th St Federal Way

Subject: Concerning the OMF South & S 344th St Federal Way
From: Vince, Tamara
To: Email The Board
Sent: Tuesday, March 23, 2021 6:36 PM

Members of the Sound Transit Board,
I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.
Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.
Use the Midway landfill space!!
Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025161	Vince Tamara	Individual		tamara.vince@united.com

Communication ID: 471844 - Site for Maintenance Facility.

Communication (3/24/2021)

Site for Maintenance Facility

From: Lois Kutscha <loiskutscha@gmail.com>
Sent: Wednesday, March 24, 2021 8:43 PM
To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>
Subject: Site for Maintenance Facility

We prefer the Midway site for the Maintenance Facility. The area is already a commercial area compared to the Federal Way sites. Thank you for asking for public input.

Norm and Lois Kutscha
normkutscha@gmail.com
loiskutscha@gmail.com

Owner(s):

Contact ID	Name	Type	Phones	Email
1025196	Lois Kutscha	Individual		loiskutshca@gmail.com
1025197	Norm Kutscha	Individual		

Communication ID: 471980 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/28/2021)

Concerning the OMF South & S 344th St Federal Way

From: Dean Fulcer <dfulcer@gmail.com>
Sent: Sunday, March 28, 2021 11:57 AM
To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025322	Dean Fulcer	Individual		dfulcer@gmail.com

Communication ID: 471981 - Concerning the OMF South & S 344th St Federal Way.

Communication (3/28/2021)

Concerning the OMF South & S 344th St Federal Way

From: Danielle Fulcer <Daniellefulcer@comcast.net>

Sent: Sunday, March 28, 2021 11:54 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025323	Danielle Fulcer	Individual		Daniellefulcer@comcast.net

Communication ID: 471982 - Belmore Park

Communication (3/30/2021)

Belmore Park

From: JAMES HENNESSEY <JAMESPH69@msn.com>

Sent: Sunday, March 28, 2021 12:16 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Belmore Park

Good afternoon, my name is James Hennessey, my wife and I are residents in Belmor Park, Federal Way. Myself and all the residents of Belmore are very concerned that you will be displacing hundreds of Senior Citizens that are on fixed income. Many of us purchased brand new homes within the past 4 years, without the Park EVER disclosing that it was a strong possibility that Sound Transit would be coming through the park. Reviewing the map of the potential routes from Federal Way to Tacoma, Sound Transit could go around the park without impacting the residents and avoid relocating us. YES, you might have to slow down a bit and lose 2-3 seconds of time, i don't think that's going to impact riders. My question is this, has your office taken into consideration that the residents of Belmor are senior citizens on a fixed income. Where are we going to move to that's affordable? And what about myself and others that just purchased a brand-new home that still has a mortgage? I'm sure there's been a lot of discussion with the owners, The Hynes Group in regards to Sound Transits intentions and plans, unfortunately, the residents of Belmor have had very limited communication from them, in fact we haven't had any updates or communication with them or Management since 2019. On behalf of the residents of Belmor Park, please reconsider coming through our park and find an alternate that wilol not displace us senior citizens.

Thank you,

James & Kathi Hennessey

Owner(s):

Contact ID	Name	Type	Phones	Email
899652	James Hennessey	Individual		JAMESPH69@msn.com
1025324	Kathi Hennessey	Individual		

Communication ID: 471983 - OMF South Draft EIS

Communication (3/28/2021)

OMF South Draft EIS

From: Edward Miller <mill425@comcast.net>

Sent: Sunday, March 28, 2021 2:46 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Draft EIS

Of the proposed alternatives set forth in the Draft EIS, it is clear that the best alternative is:

Midway Landfill - Full Excavation

It has the least negative impact to homes, businesses, jobs, wetlands, and streams. It also has significant benefits in returning a currently unused site from a community liability into a useful asset.

Construction costs and duration can be accommodated in the overall plan, particularly in light of project realignment currently under consideration. The Midway Landfill site has no risk of increasing real estate prices, and the construction timeframe can be mitigated by both an early start and adjusting the completion date to align with a delayed requirement for service on the southern line extensions.

I strongly encourage you to choose the Midway Landfill - Full Excavation alternative as the Preferred Alternative.

Sincerely,
Edward C. Miller
Federal Way property owner

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1023384</u>	<u>Edward Miller</u>	Individual		<u>mill425@comcast.net</u>

Communication ID: 471984 - OMF South Draft EIS

Communication (3/28/2021)

OMF South Draft EIS

From: Edward Miller <mill425@comcast.net>

Sent: Sunday, March 28, 2021 3:02 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Draft EIS

Of the proposed alternatives set forth in the Draft EIS, it is clear that the WORST alternative is:

South 344th Street

It has the strongest negative impact to homes, businesses, and jobs. Of particular concern is the elimination of a large number of residences and businesses that would be destroyed, including the loss of the Ellenos Yogurt manufacturing facility that is located within the boundary of this alternative.

The other proposed alternatives are clearly better choices. I strongly encourage you to recommend AGAINST choosing the South 344th Street alternative as the Preferred Alternative.

Sincerely,
Edward C. Miller

Owner(s):

Contact ID	Name	Type	Phones	Email
1023384	Edward Miller	Individual		mill425@comcast.net

Communication ID: 472033 - OMF South Best Option (comments)

Communication (3/26/2021)

OMF South Best Option (comments)

From: pugnetti@aol.com <pugnetti@aol.com>
Sent: Friday, March 26, 2021 11:55 PM
To: OMF South <OMFsouth@soundtransit.org>
Subject: OMF South Best Option (Comments)

Please make sure all addresses get a copy of the attached comments file Thank you very much.

To: Sound Transit Board:
Kent Keel
Dow Constantine
Paul Roberts
Nancy Backus
David Baker
Claudia Balducci
Bruce Dammeir
Jenny A Durkan
Debora Juzrez
Joe McDermott
Robert Millar
Kim Roscoe
Nicola Smith
Dave Somers
Dave Upthegrove
Peter Van Reichbauer Hussian Rehmat
Victoria Woodards
Subject: OMF South Best Option

Hello,

Let me identify myself. I am Patricia Pugnetti. I was born and raised in Tacoma. After my marriage in 1973, my husband and I moved to the Federal Way area. Therefore, I call myself a native of the area. I can remember when there was discussion of what to do with the Midway landfill area after it closed. It was known that the landfill would not be available for any type of normal usage for a period of time because of gas venting and such.

To consider already developed sites containing business, churches, residences, and natural habitat for the OMF site is a counterproductive use of King County land. Public input in prior rounds of comments overwhelmingly supported using the Midway landfill site as the Prime Spot for this OMF facility. At this point that should be loud and clear to Sound Transit.

EPA's Tmline.

Milestone	Date(s)
Initial Assessment Completed	01/01/1983
Proposed to the National Priorities List	10/15/1984
Finalized on the National Priorities List	06/10/1986
Remedial Investigation Started	03/28/1985
Final Remedy Selected	09/06/2000
Remedial Action Started	Not Yet Achieved
Construction Completed	09/21/2000
Deleted from National Priorities List	Not Yet Achieved
Most Recent Five-Year Review	08/28/2020

Now, the time is at hand and the EPA's timeline shows that remediation on the Midway site is completed (see above) and the next step is to remove it from the national priorities list just in time to be used for the OMF project.

Regarding Midway site:

Public preferers using this site. Building at this location is done with consent of the governed.

Business (jobs), churches, residences and natural habitat are not impacted.

Does not remove land availability from commercial/private use in an ever more densely populated South King County. Therefore, is a better long-term stewardship of our finite land.

Places OMF immediately next to tracks already under construction. Supports maintenance despite possible realignment and funding issues delaying expansion beyond Federal Way. Earlier start date possible.

Creates more south end jobs by not displacing those currently situated on Alternative Federal Way locations.

Cost delta between Midway and other projects is dwarfed compared to TDLE, Ballard, Everett, and Kirkland-Issaquah links costs.

Regarding South 344th Street site:

Business (jobs), churches, residences, natural habitat are impacted.
Ellenos Yogurt factory has approximately 150 employees, multi-millions of dollars in equipment and special licensing. Is the only industrial business in Federal Way.
Garage Town a community of 67 individually owned units (same as owning a condominium unit).
Has modern substantial buildings including a clubhouse. They are used as extensions of households and to support businesses. Only facility of its kind in King County.
Supports a broadcasting tower. Radio towers have certain land-configuration needs which must be addressed and special licensing.
This site is a hill with businesses and residences on all sides. Is not near level like other two sites.
Loss of existing family homes.
Loss of tax revenue for City of Federal Way and King County.
The City of Federal Way has written to Sound Transit of their complete disapproval of any further acquisition of properties in their city. Loss of a portion of downtown retail acreage for rail station is plenty. Another municipality (Kent) would like to accommodate the OMF. Neither of the two Federal Way alternatives should be considered for use.
Loss of approximately 250 jobs. (EIS needs to be updated to reflect the true facts on job losses.)
Open your eyes Sound Transit, the best land choice for the OMF is the Midway Landfill area. You are going to have a lot of unhappy voters out there if you choose otherwise.

Patricia Pugnetti
29022 50th Place South
Auburn, WA 98001
(253) 941-5793

Documents: OMFS letter.docx

Owner(s):

Contact ID	Name	Type	Phones	Email
921662	Patricia Pugnetti	Individual		pugnetti@aol.com

Communication ID: 472034 - (2) Noise impacts at the OMF South

Communication (3/30/2021)

(2) Noise impacts at the OMF South

From: Greg Greenstreet <gdgreenstreet@gmail.com>
Sent: Tuesday, March 30, 2021 1:44 PM
To: OMF South <OMFsouth@soundtransit.org>
Cc: Ramachandra, Sagar <sagar.ramachandra@soundtransit.org>
Subject: Re: Noise impacts at the OMF South

Hello Sidney,

Thank you for the thorough response. I believe the Midway Landfill would be the best location for the O&M facility based on this clarification information. The area there with the college, light rail station, new business establishments and additional multiuse 5-story buildings is a terrific foundation of a small land use planned village. The O&M facility is the smart way to deal with the landfill for now and the future. There are very few opportunities to correct a past mistake correctly.

Best regards,
Greg

Owner(s):

Contact ID	Name	Type	Phones	Email
921798	Greg Greenstreet	Individual		gdgreenstreet@gmail.com

Communication ID: 472035 - Concerning the OMF South & S 344th St Federal Way

Communication (3/24/2021)

Concerning the OMF South & S 344th St Federal Way

From: kimberawilson <kimberawilson@gmail.com>
Sent: Wednesday, March 24, 2021 11:33 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.
Kimberly Wilson

Federal Way

Owner(s):

Contact ID	Name	Type	Phones	Email
1025369	Kimberly Wilson	Individual		kimberawilson@gmail.com

Communication ID: 472036 - Concerning the OMF South & S 344th St Federal Way

Communication (3/25/2021)

Concerning the OMF South & S 344th St Federal Way

From: M J <mgjuignon@gmail.com>
Sent: Thursday, March 25, 2021 9:45 AM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Michael Juguilon
Homeowner @34220 18TH PL S

Owner(s):

Contact ID	Name	Type	Phones	Email
881674	Michael Juguilon	Individual		mgjuignon@gmail.com

Communication ID: 472037 - OMF South

Communication (3/25/2021)

OMF South

From: seabjorn@comcast.net <seabjorn@comcast.net>
Sent: Thursday, March 25, 2021 10:21 AM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: OMF South

Dear Board Members,
We have read the EIS for the OMF South and urge you to eliminate the So. 344th site from the list of potential sites. Per your data, and an easy drive around the neighborhood, the So. 344th site is a very valuable addition to the Federal Way community as it contains a large number and variety of affordable housing units and is home to more than 200 jobs. As everyone is aware, after this exceptionally difficult year, housing and jobs are the top priority for any community. And affordable housing in the Puget Sound area is becoming increasingly difficult to obtain. Protecting jobs which add to the community, protecting affordable housing, and maintaining a tax base for the city are all factors which make choosing a different site for the OMF a straightforward choice.
Thank you for considering this input, and, please direct your focus to one of the other two sites. Federal Way and its citizens need this neighborhood intact for housing and jobs.
Bjorne and Christine Hansen
Tacoma, Washington
seabjorn@comcast.net

Owner(s):

Contact ID	Name	Type	Phones	Email
881810	Bjorn Hansen	Individual	253-691-6519	seabjorn@comcast.net

Communication ID: 472223 - (1) OMF South DEIS public comment - South train yard

Communication (3/31/2021)

(1) OMF South DEIS public comment - South train yard

From: darlapom99 <darlapom99@aol.com>
Sent: Wednesday, March 31, 2021 1:15 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: South train yard

To whom it may concern,
I believe the Midway landfill is the best place to put the South train yard. It just makes sense.
Thank you for your time,
Darla Magnuson

Owner(s):

Contact ID	Name	Type	Phones	Email
1025493	Darla Magnuson	Individual		darlapom99@aol.com

Communication ID: 472224 - (1) OMF South DEIS public comment - OMF South Train Yard

Communication (3/31/2021)

(1) OMF South DEIS public comment - OMF South Train Yard

From: Mary Van Horn <maryfranv@yahoo.com>
Sent: Wednesday, March 31, 2021 8:49 PM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: OMF South Train Yard

Please choose the Midway Landfill site for the OMF South Train Yard. Please respect and protect Federal Way residents, businesses and places of worship.

Thank you in advance for making a sensible decision to locate the OMF South Train Yard on the Midway Landfill site.

Mary Van Horn

Federal Way Resident

Owner(s):

Contact ID	Name	Type	Phones	Email
1025496	Mary_Von_Horn	Individual		maryfranv@yahoo.com

Communication ID: 472225 - (1) S 344th removal from consideration

Communication (4/1/2021)

(1) S 344th removal from consideration

From: TONY Palagyi <excatcher9@gmail.com>
Sent: Thursday, April 1, 2021 3:43 AM
To: Email The Board <EmailTheBoard@soundtransit.org>
Subject: S 344th removal from consideration

Members of the Sound Transit Board,

Dick's Drive Inn was previously eliminated from consideration as an alternative site due to public perception and negative impacts. Please now eliminate the S. 344th for the same exact same reasons. Of the three alternatives It is the highest negative impacts to property owners, City of Federal Way and local employees who will lose their jobs.

The negative impacts for each alternative site as documented by your own Draft EIS Statement are summarized here.

<536917c4-d318-490c-9c51-25f6ffe9340c.jpeg>

As you can see S 344th site has the most negative impacts by a very large margin. Please eliminate the S. 344th from further consideration. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025499	Tony_Palagyi	Individual		excatcher9@gmail.com

Communication ID: 472286 - OMF South DEIS OOH Comment 1

Communication (3/5/2021)

OMF South DEIS OOH Comment 1

1. The landfill location is preferred.
2. Do not ask taxpayers for more money.
3. Meet all transit commitments.
4. Meet all deadlines.
5. Collect fares and enforce payment.

Communication ID: 472287 - OMF South DEIS OOH Comment 2

Communication (3/5/2021)

OMF South DEIS OOH Comment 2

Environmental impacts, cost, and timeline are most important to me. Since Midway would be so much more expensive and take longer to build, and because building on a landfill has SO MUCH uncertainty (meaning increased cost), I'm inclined to support choosing one of the Federal Way options. Ideally, much of the construction cost savings would be used for substantial environmental mitigation, such as nearby wetland restoration projects and tree planting. However, I'll admit I don't have much information about the residential and business displacement. From an equity standpoint, I'd be curious who would be displaced and if this displacement would be perpetuating any historic harm against low-income communities or communities of color. Thanks for this informative online open house - I appreciate the use of clear graphics to demonstrate relative quantitative impacts.

Communication ID: 472288 - OMF South DEIS OOH Comment 3

Communication (3/5/2021)

OMF South DEIS OOH Comment 3

The report has a lot of good information. However, I believe the Christian Faith Center site should be removed from the 3 selections. This is a house of worship for many as well as a school. Including the 3rd site that also affects Christian Faith Center areas and surrounding business and residences I don't believe is ideal. The noise at these areas would not benefit the community. While the Kent site offers a better surrounding area, the environmental requirements to prepare this site would be costly. However, considering the neighborhoods for the other 2 sites and the disruptions to those area, I believe the Kent site is still the best option.

Communication ID: 472289 - OMF South DEIS OOH Comment 4

Communication (3/5/2021)

OMF South DEIS OOH Comment 4

I firmly believe this is your best available option. Your impact on the community will be substantial in other areas. The landfill makes the most sense even if it costs extra in engineering. It's land that's already vacant and next to I5. Put the tax payers money to good use and don't wipe out churches and established companies. I have spoken to several members of the community and the other sites have streams and wetlands. Local tribal council needs these areas respected. We only get on earth and our environmental impact is very important. What happens when you sell that same land at the landfill 10 years later to developers. The community will feel cheated.

Communication ID: 472290 - OMF South DEIS OOH Comment 5

Communication (3/5/2021)

OMF South DEIS OOH Comment 5

Leave the Christian Faith Center alone. Build somewhere else. p.s. stop asking b.s. questions about sexual identity/race. That stuff is inappropriate and should be illegal!

Owner(s):

Contact ID	Name	Type	Phones	Email
1025385	Ray Stewart	Individual		rbs4658@yahoo.com

Communication ID: 472291 - OMF South DEIS OOH Comment 6

Communication (3/5/2021)

OMF South DEIS OOH Comment 6

Even with the higher costs for construction and operation it screams Landfill Site is the only option. Less disruption to Everything and the only negatives that you listed is related to MONEY & TIME. Construction traffic is not a issue.

Owner(s):

Contact ID	Name	Type	Phones	Email
890002	AARON BOYD	Individual		aaronboyd@comcast.net

Communication ID: 472292 - OMF South DEIS OOH Comment 7

Communication (3/5/2021)

OMF South DEIS OOH Comment 7

Please choose the Midway site. This is exactly the kind of thing that public funds should be used for, turning a site that has no commercial attraction/potential into a productive part of a community.

Communication ID: 472293 - OMF South DEIS OOH Comment 91

Communication (3/5/2021)

OMF South DEIS OOH Comment 91

336th seems like the clear winner here with the least amount of business and residential impact. The landfill seems too expensive to build on with public funds given the less expensive options. It's nice that it's already empty, but that's all it has going for it.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025386	Scott O'Dell	Individual		thescot@gmail.com

Communication ID: 472294 - OMF South DEIS OOH Comment 8

Communication (3/5/2021)

OMF South DEIS OOH Comment 8

I support the Midway landfill site. Despite higher costs, the impact in the long run on the environment, businesses, residents, and neighborhood in general will be worth the extra cost. The land is currently not being used - don't tear down existing structures/homes and ruin wetlands when we have the opportunity to make something good out of land previous generations wrecked. There is also the issue of equity: if we are considering doing tunnels and such for other portions of the rail system where wealthier people live, we should give lower-income folks (those of us in Kent & Federal Way) the same respect. Because you are not rich doesn't mean you don't care about aesthetics or trashing of natural landscape. We don't want our neighborhoods ruined any more than the home owners in Ballard or West Seattle. It's a matter of equity for people in the South End.

Owner(s):

Contact ID	Name	Type	Phones	Email
880437	Krista Scott	Individual		kristadeescott@hotmail.com

Communication ID: 472295 - OMF South DEIS OOH Comment 9

Communication (3/5/2021)

OMF South DEIS OOH Comment 9

I would prefer the midday option because of the minimal impact to both the environment and business

Owner(s):

Contact ID	Name	Type	Phones	Email
1025387	Kimberly Oconnor	Individual		Curlydoo67@yahoo.com

Communication ID: 472296 - OMF South DEIS OOH Comment 10

Communication (3/6/2021)

OMF South DEIS OOH Comment 10

The Midway landfill site is the obvious choice. What better way to use a property that cannot be used for anything else, while minimizing negative impact to people. I think alternative materials and options for the landfill site development should also be explored to lower the development cost of that site.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025388	Bob Strong	Individual		b.strong@comcast.net

Communication ID: 472298 - OMF South DEIS OOH Comment 12

Communication (3/7/2021)

OMF South DEIS OOH Comment 12

I propose that the Midway Landfill location will be the home of the OMFS. I know it will be more costly, but to clean up a contaminated waste site and build a facility to benefit the whole of King county is the right thing to do. Additionally, I don't want us to be displaced. I'm a homeowner at the South 344th Street Alternative. If I knew that this location was on the list of future sites for the OMFS, I won't had purchased it in 2018. Now though, we love our neighborhood of mixed businesses and residences. Please do the right thing. Pick the Midway Landfill site. Let's clean it up then build the OMFS facility. Thank you!

Owner(s):

Contact ID	Name	Type	Phones	Email
1025389	Mike Juguilon	Individual		mjjuguilon@gmail.com

Communication ID: 472299 - OMF South DEIS OOH Comment 13

Communication (3/7/2021)

OMF South DEIS OOH Comment 13

Clearly the Midway landfill is the obvious choice.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025390	Dane Bergman	Individual		danebergman@hotmail.com

Communication ID: 472300 - OMF South DEIS OOH Comment 15

Communication (3/8/2021)

OMF South DEIS OOH Comment 15

I live in federal way, close to one of the preferred sites. I'd rather have this construction built in Kent.

Communication ID: 472301 - OMF South DEIS OOH Comment 14

Communication (3/8/2021)

OMF South DEIS OOH Comment 14

South 336th seems like the best option to be less expensive and impact the least amount of homes and businesses. There are many older homes in the 344th option that could cost financial impacts and displacement to those who live there.

Communication ID: 472302 - OMF South DEIS OOH Comment 92

Communication (3/8/2021)

OMF South DEIS OOH Comment 92

After reviewing the EIS for all three locations I feel that the Midway Landfill location is still the best alternative. It disrupts the community less. As a Superfund site it's use and impact on the greater environment has already been closely monitored and mitigated for. I wholeheartedly endorse the use of the Midway location.

Owner(s):

Contact ID	Name	Type	Phones	Email
889689	Tad Doviak	Individual		taddoviak@gmail.com

Communication ID: 472303 - OMF South DEIS OOH Comment 23

Communication (3/9/2021)

OMF South DEIS OOH Comment 23

Go back to the location in Kent where Loews & Dickson are, both can be relocated (to the midway landfill)

Owner(s):

Contact ID	Name	Type	Phones	Email
1025391	Doran Luce	Individual		doran.luce@gmail.com

Communication ID: 472304 - OMF South DEIS OOH Comment 22

Communication (3/9/2021)

OMF South DEIS OOH Comment 22

Use undeveloped site in Midway as it well overdue for usage. Clean up the mess that was left years ago.

Communication ID: 472305 - OMF South DEIS OOH Comment 21

Communication (3/9/2021)

OMF South DEIS OOH Comment 21

The Land Fill site seems the less onerous of the two considered, but why is this limited to two prospective sites. Have you even looked at the Weyerhaeuser property? This rail project will be around for many years, why rush it? Get more information, consider a few more options and let's do this right!

Owner(s):

Contact ID	Name	Type	Phones	Email
1025392	Michael Sprague	Individual		fuzzy2k9000@yahoo.com

Communication ID: 472306 - OMF South DEIS OOH Comment 20

Communication (3/9/2021)

OMF South DEIS OOH Comment 20

Sound Transit, The obvious choice here is to place the transfer station on the landfill. It seems ignorant to even study the sites in federal way due to the obvious environmental and business impacts. I understand the budget difficulties due to every project costing significantly more then expected, but please consider all factors when determining where to place this operations center. The money wasted by studying this is a waste to the tax payer. Thank you for your time

Owner(s):

Contact ID	Name	Type	Phones	Email
1025393	Tony Gringle	Individual		tgringle@yahoo.com

Communication ID: 472307 - OMF South DEIS OOH Comment 19

Communication (3/9/2021)

OMF South DEIS OOH Comment 19

Your information is good; lengthy as it should be and not everyone will spend the time to review it because of that length. Simply put by your own words below MIDWAY is the only choice. This site would create the fewest residential, business and employee displacements of the three site alternatives. It would result in no impacts to community and social resources, wetland or streams and create the fewest forest impacts. Your agency is huge drawing on taxpayers dollars. I reviewed salaries alone from the FOIA obtained in 2018 and it shows 1066 employees. 10 pages into the 43 pages total (253 names) I was still seeing 6 figure salaries. 20 earned over \$200,000.00 per year. Do not use "expense for Midway" as an excuse. Do not use "time of construction" as an excuse. Your delivery to date has been late. I pay for it but will never see the "good" if any come from it. I will attend the public meetings and ensure that you hear MIDWAY!

Owner(s):

Contact ID	Name	Type	Phones	Email
1025394	Robert Wheeler	Individual		pavlichwheeler@msn.com

Communication ID: 472308 - OMF South DEIS OOH Comment 18

Communication (3/9/2021)

OMF South DEIS OOH Comment 18

While I see the Midway Landfill is the longest and most expensive location of the 3 proposed sites, the impact to forests (and animals living there), streams, and businesses at the other sites, is a huge concern. As I live just below the Midway site, next to the College, and use this particular stretch of highway for travel to and from shopping and errands, I am not thrilled about the impact on traffic that a longer preparation time could have. Also, placing columns of concrete seems like there would be noise, and vibration, which after only a small period of time, would become quite annoying. When all is said and done, what will be the noise impact if any, and will shift changes bring in extra traffic and congestion, and if so, will Sound Transit be a partner in road upkeep, and noise and traffic mitigation?

Owner(s):

Contact ID	Name	Type	Phones	Email
1025395	Maire Dhu Lemley	Individual		mdlemley53@gmail.com

Communication ID: 472309 - OMF South DEIS OOH Comment 17

Communication (3/9/2021)

OMF South DEIS OOH Comment 17

We would prefer the Midway Landfill site for the OMF South Site. It would have the least impact on traffic in the area. It would also have the least harm to small businesses and homes in the area.

Communication ID: 472310 - OMF South DEIS OOH Comment 16

Communication (3/9/2021)

OMF South DEIS OOH Comment 16

I think a platformed option over the Midway Landfill is the best option for the community in the long run. I also think that citing the OMF within walking distance of the station, as Midway does, could help allow OMF employees to take Link to work.

Communication ID: 472311 - OMF South DEIS OOH Comment 30

Communication (3/10/2021)

OMF South DEIS OOH Comment 30

How much noise would be heard by the train from 320th to 330th St? Would Sound Transit buy property on 330th? How would you keep the homeless population down at the light rail stations and loitering??? This light rail system could make the Federal Way homeless issues worse? How can Sound Transit keep it under control?

Owner(s):

Contact ID	Name	Type	Phones	Email
1025396	Cheryl Lyons	Individual		cherylmlyons@gmail.com

Communication ID: 472312 - OMF South DEIS OOH Comment 29

Communication (3/10/2021)

OMF South DEIS OOH Comment 29

The OMF is needed for West Seattle or Tacoma extensions. It is not needed for the Federal Way extension. The logical place for a large industrial yard such as this is in an area that is industrial in nature. As this OMF is not needed until much later phases, the options on the table should be tossed and new options reevaluated. The most appropriate place for this yard is likely in the industrial area of the Tacoma / Fife tideflats. I would also look at this with the lens of Equity. The areas that are being selected currently are home to our low income and BIPOC populations. Why are we placing massive industrial infrastructure with 24x7 light and noise pollution where our poor and BIPOC neighbors live?

Communication ID: 472313 - OMF South DEIS OOH Comment 28

Communication (3/10/2021)

OMF South DEIS OOH Comment 28

DO not destroy the homes schools etc in the s 344th st or 336th st sites!!!!!! NO need to with midway as the least destructive plan!! You have no \$ for this or even running the system at all this entire entity is planned for a non existent user base so you loose \$ ever year STOP MAKING BAD CHOICES this hurts everyone!!!!!!!!!!!!!!

Communication ID: 472314 - OMF South DEIS OOH Comment 27

Communication (3/10/2021)

OMF South DEIS OOH Comment 27

While it may not be the cheapest option or easiest to build on, I urge ST to choose the Midway site for the South OMF. It has the least impact to people, the environment (both natural and built), and the economy. It also doesn't require the removal of housing, which our region is already in desperate need of. The Midway site also gives us a chance to "recycle" this vacant eyesore into something useful and beneficial for the community.

Communication ID: 472315 - OMF South DEIS OOH Comment 26

Communication (3/10/2021)

OMF South DEIS OOH Comment 26

Please put this at the Christian Faith Center. This will be less disruptive and safer than the landfill. Please do NOT use the landfill... unsafe now AND IN FUTURE. THANK YOU

Communication ID: 472316 - OMF South DEIS OOH Comment 25

Communication (3/10/2021)

OMF South DEIS OOH Comment 25

The Midway site is preferable because of the lack of residences and businesses needed to be removed. The additional cost for constructing this site should be itemized separately and funding pursued from congress and/ or the state. It is a smart re-purposing of otherwise useless land in the midst of a dense urban area.

Owner(s):

Contact ID	Name	Type	Phones	Email
921585	Dennis Higgins	Individual		dennis_higgins@hotmail.com

Communication ID: 472317 - OMF South DEIS OOH Comment 24

Communication (3/10/2021)

OMF South DEIS OOH Comment 24

Landfill option all the way! I know it's the most expensive option but think about the positive impacts of utilizing an underutilized, blighted space. Also trying to build into established properties, especially from marginalized communities, could stir up the locals who depend on them.

Communication ID: 472318 - OMF South DEIS OOH Comment 34

Communication (3/11/2021)

OMF South DEIS OOH Comment 34

Either alternative is preferable to the Midway Landfill. The costs associated with the landfill site are simply indefensible.

Communication ID: 472319 - OMF South DEIS OOH Comment 33

Communication (3/11/2021)

OMF South DEIS OOH Comment 33

The south transit system is terrible system and is not useful, compare to the metro system in Washington DC, New York. The south transit is a new system, but is not accessible, very slow and cost too much. it should be stop and investing in some else better than this system.

Communication ID: 472320 - OMF South DEIS OOH Comment 32

Communication (3/11/2021)

OMF South DEIS OOH Comment 32

The Midway landfill alternative while more costly upfront and more challenging due to the superfund site status seems to be the best long term decision. It puts a piece of property to a better use than simply being a capped landfill while it offers fewer impacts to residents in the Federal Way area that would be displaced by either of those options, allows business and tax base to remain rather than be lost in Federal Way, and does not impact the streams in the Federal Way area.

Communication ID: 472321 - OMF South DEIS OOH Comment 31

Communication (3/11/2021)

OMF South DEIS OOH Comment 31

The Midway Landfill is the best option. There are only two negatives for location that will require detailed planning and impact considerations: 1. Superfund site and all of the environmental mitigations that come with it. 2. Traffic and pedestrian impacts. Being next to 516 & I-5 interchange and a college already causes problems with large volumes. Adding the transit stop and OMF will cause an exponential volume increase and will require a major overhaul the traffic pattern/plan for a mile in all directions.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025398	Danyel Lyons	Individual		dqlyons77@gmail.com

Communication ID: 472322 - OMF South DEIS OOH Comment 35

Communication (3/14/2021)

OMF South DEIS OOH Comment 35

Midway landfill makes the most sense. You won't displace any businesses, churches, or homeowners. It's a blank slate, and making use of something that has sat for the last 50 years.

Communication ID: 472323 - OMF South DEIS OOH Comment 36

Communication (3/15/2021)

OMF South DEIS OOH Comment 36

I prefer the Midway site with the excavation plan. It has by far the fewest residential, business and environmental impacts which minimizes potential cost and litigation due to land acquisition, community impact and natural environment mitigation strategies. It also doesn't require the build of additional track beyond Federal Way at this time saving project cost in the near term.

Owner(s):

Contact ID	Name	Type	Phones	Email
776019	Jason Little	Individual	206-954-9879 206-954-9879 (Home)	bigjasonlittle@yahoo.com

Communication ID: 472324 - OMF South DEIS OOH Comment 38

Communication (3/16/2021)

OMF South DEIS OOH Comment 38

Prefer Midway Landfill site as it allows site to go back to productive use and not impact jobs at others.

Owner(s):

Contact ID	Name	Type	Phones	Email
875551	Richard Tackett	Individual		Tackett22224@gmail.com

Communication ID: 472325 - OMF South DEIS OOH Comment 37

Communication (3/16/2021)

OMF South DEIS OOH Comment 37

Please consider the negative impact to our community if you build the maintenance facility in Federal Way. The initial investment to clean up and re-purpose the Midway Landfill location is well worth the time and money. It will take useless land and recycle it into a valuable asset. Also, the Midway Landfill location will not negatively affect any residential areas. Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025399	Lydia Long	Individual		lydia_long@hotmail.com

Communication ID: 472326 - OMF South DEIS OOH Comment 41

Communication (3/18/2021)

OMF South DEIS OOH Comment 41

After looking at all three choices and evaluating the potential impacts to the ecosystem, businesses, the residence, the community as well as the costs, and current land utilization. The midway landfill is the best choice. Yes, it will cost more but we will be repurposing the landfill in a positive manner and turning something that has been an eye sore into an integral part of our community. While minimizing all of the impacts above else where. The investment is worth the additional cost.

Communication ID: 472327 - OMF South DEIS OOH Comment 40

Communication (3/18/2021)

OMF South DEIS OOH Comment 40

Midway landfill is the best geographical location: already empty land that requires no buyout, already on the mainline that is getting built right now, and in a worst case scenario where the Tacoma extension has to be put on indefinite pause due to Covid-related funding impacts, it requires no extra mainline to be built beyond the Federal Way extension. However, the impact of it being a landfill, and all the problems that come with building on a superfund site, are even more enormous than I imagined. From a pure budgetary standpoint, either of the other two sites should be used, simply because Covid has caused ST3 funding to evaporate to such a degree that resource are spread too thin to do anything but the cheapest option. Unfortunately for the accountants, I am an idealist. With Sound Transit being a public organization rather than a private one, I think it should have the duty to look beyond the monetary cost/benefit analysis of a project and instead focus on how much of an improvement said project can bring to an area. Of the three sites, I think developing the Midway site provides the greatest improvement to the surrounding community. Yes, it will cost billions of dollars more, but it will reduce (or possibly even eliminate, if I understand the full excavation proposal correctly) the impact of a superfund site that is smack dab in the middle of a growing urban area, directly adjacent to three major transportation arterials (99, I-5, and eventually the Link Mainline). Kent and Des Moines were quite eager to push the landfill onto Sound Transit when the initial OMF rumor pointed to a shopping center, and perhaps those cities can put some money where their mouth is and assist with the cost, along with Seattle who would no longer be responsible for monitoring and cleanup. This literal neighborhood cleanup could be a group effort to do good. The other two sites involve eminent domain of land that can be used for other purposes, and in fact currently is. Using Midway offers the region the opportunity to transform useless, dangerous land into something useful. I think that is a long term benefit to the area that is worth the added cost, and it's only with Sound Transit's governmental backing and large funding that I foresee this site ever being transformed to something usable in my lifetime.

Owner(s):

Contact ID	Name	Type	Phones	Email
962983	Kyle Kooy	Individual		kyle.kooy@gmail.com

Communication ID: 472328 - OMF South DEIS OOH Comment 39

Communication (3/18/2021)

OMF South DEIS OOH Comment 39

I am totally against this entire project and don't want it anywhere.

Communication ID: 472329 - OMF South DEIS OOH Comment 43

Communication (3/19/2021)

OMF South DEIS OOH Comment 43

I think the additional expense to put the site at the Midway landfill is worth it. The other 2 options uproot businesses in Federal Way.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025400	Jeannie VanVleet	Individual		Dvanjvan@msn.com

Communication ID: 472330 - OMF South DEIS OOH Comment 42

Communication (3/19/2021)

OMF South DEIS OOH Comment 42

I support the location at the S. 336th Street site as the first choice. Alternatively, the Midway landfill site.

Communication ID: 472331 - OMF South DEIS OOH Comment 45

Communication (3/20/2021)

OMF South DEIS OOH Comment 45

Although the projected cost and length of time are higher for the Midway facility, I believe this would be the best choice. The other two displace workers and residents. There is a high number under represented residents and employees in this area and that needs to be acknowledged and considered strongly. What will happen to those displaced? Is there truly fair compensation that all of the residents and employees have a say in? Or is there any compensation? And that is a cost factor. Then there are the protected lands that could really screw up the ecosystem. Not just what is built upon but also the other side of I-5. Yes. There is noise but then you are increasing noise and air pollution. There has already been a large growth of urban development in Federal Way, so I hear from long term residents. I would hate for Federal Way to lose more of its natural beauty as well. Then the construction and constant ongoing work at the Federal Way sites 336th & 344th would continue to disrupt the ecosystem around the facility, not to mention disrupt traffic and make it harder for travelers and commuters getting to and from Auburn. Also, why does the midway location cost more annually? I understand construction but not the ongoing cost. There is less track to the facility. Because it is further from the FW transit center? It would be closer to the Kent stations wouldn't it? Even so, I would rather have the extra cost to protect the community and the environment. Also, it seems excavation would be a safer option but I am not an engineer. But I do worry about employees working over a toxic ground. I would think with heat and other environmental changes the toxins could rise to the surface. Plus, wouldn't that be better if there is still shifting ground? Again I am not an engineer.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025401	Laura Arnold	Individual		Etherialaura@yahoo.com

Communication ID: 472332 - OMF South DEIS OOH Comment 44

Communication (3/20/2021)

OMF South DEIS OOH Comment 44

I strongly oppose either of the two sites located in Federal Way. Bringing such a site to the downtown area would destroy it. Who would want to come anymore. I certainly would not. It would uproot business, cost jobs and destroy homes. The level of traffic, during and after construction, caused by the site would have a horrible effect on traffic in the area. Property values nearby would plummet. It is past time that we stop putting money before people. The Midway Landfill may be more expensive financially, but it would destroy fewer lives and businesses and would leave Federal Way as city still worth living in. Putting this site in Federal Way would only drive people and businesses away.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025402	Barbara Sperling	Individual		bsperling@comcast.net

Communication ID: 472333 - OMF South DEIS OOH Comment 48

Communication (3/22/2021)

OMF South DEIS OOH Comment 48

Based on the information provided, I believe the most prudent option for the new OMF site is the Midway Landfill. It has the least impact on both the environment and people.

Communication ID: 472334 - OMF South DEIS OOH Comment 47

Communication (3/22/2021)

OMF South DEIS OOH Comment 47

I prefer midway landfill site because this option will have less environmental impact even though it takes more time to build and costs more. I need to prepare the future in long term. The landfill site is less congested as well at this point.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025403	SE JONG KIM	Individual		ksj1219@gmail.com

Communication ID: 472335 - OMF South DEIS OOH Comment 46

Communication (3/22/2021)

OMF South DEIS OOH Comment 46

Big waste of taxpayer money, only to be built to increase the empires of the politicians, and the power they have, and the government. This does nothing for anyone else

Owner(s):

Contact ID	Name	Type	Phones	Email
1025404	David Lind	Individual		Davidandsuelind@comcast.net

Communication ID: 472336 - OMF South DEIS OOH Comment 50

Communication (3/23/2021)

OMF South DEIS OOH Comment 50

Based on cost alone I say either of the 2 federal way OMF are better with the S 344 st as best. Id be for either of the 2 Federal way ones as it would be better spaced for the whole south link system.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025405	Thomas Smiley	Individual		Tomskibum@gmail.com

Communication ID: 472337 - OMF South DEIS OOH Comment 49

Communication (3/23/2021)

OMF South DEIS OOH Comment 49

I prefer the Midway option to both the Federal Way EIS options. Although Midway will be more expensive and will cause more disruption during construction, it has less environmental impact and will not require the removal and replacement of any existing commercial and residential property. I believe these are the most important longer term issues. Please pick Midway! This is land that is not required for any alternative use and will otherwise not contribute to any environmental or economic solutions. Yes, more expensive, but please think longer term. The draft EIS shows this is the best choice.

Owner(s):

Contact ID	Name	Type	Phones	Email
875553	Christopher Ensor	Individual		CVENSOR@COMCAST.NET

Communication ID: 472338 - OMF South DEIS OOH Comment 54

Communication (3/24/2021)

OMF South DEIS OOH Comment 54

midway landfill its vacant and will not hurt local stores and homes

Communication ID: 472339 - OMF South DEIS OOH Comment 53

Communication (3/24/2021)

OMF South DEIS OOH Comment 53

S 336th St because of its ideal, and I don't want ppl to have to pay for extra charges for moving into a new storage facility because of our economy and folks that are broke

Owner(s):

Contact ID	Name	Type	Phones	Email
875576	Daryl Wendt	Individual		darylwendt18@gmail.com

Communication ID: 472340 - OMF South DEIS OOH Comment 52

Communication (3/24/2021)

OMF South DEIS OOH Comment 52

Having read the Draft EIS for the Sound Transit OMF South project I respectfully submit my preferred alternative recommendation is the South 336th Street Alternative. My recommendation is based on total cost of the project and the construction duration both of which appear lowest in this alternative. In my view the Midway Landfill site alternative should be removed from any further consideration. The higher cost and construction make it unattractive as a taxpayer. The site leaves open too many open questions related to cost and design which will obviously equate to a higher overall project cost. I believe the remediation costs alone would seriously delay, or worse cancel, the project for too long a time period. And the liability for the site is just too high a risk. I understand the concerns expressed by the city of Federal Way related to the South 336th Street and the South 344th Street Alternatives, but in my view those can be more easily mitigated than what the Midway Landfill site might expose in terms of costs and mitigation. So finally I submit the South 336th Street Alternative should be the alternative selected for the Final EIS for the South OMF project. Thank you for allowing my recommendation to be submitted.

Owner(s):

Contact ID	Name	Type	Phones	Email
882512	Ruth Strawser	Individual		granbyco53@msn.com

Communication ID: 472341 - OMF South DEIS OOH Comment 51

Communication (3/24/2021)

OMF South DEIS OOH Comment 51

344th sounds best to me

Owner(s):

Contact ID	Name	Type	Phones	Email
1025406	Dave Hackman	Individual		hackmanfamily@comcast.net

Communication ID: 472435 - OMF South virtual Draft EIS hearing verbal comment 1

Communication (3/24/2021)

OMF South virtual Draft EIS hearing verbal comment 1

Hello, my name is Greg, and my question is on noise mitigation and how much contribution we believe the light rail yard will contribute to the environment where we have multiple trains and sharp tracks as the train's coming in and out.

Do the wheels squeal? Are they unloading or disconnecting heavy equipment? I don't know. I worked in a facility down by Martin Luther King Way, the south end of Boeing Field.

There's kind of an S curve that the lightrail goes through. The train actually squeals. I know that Sound Transit works on it quite often trying to mitigate the noise, but I was wondering if that single train is similar to what we have.

It looks like about six tracks or a dozen tracks in the yard. What has the noise mitigation been or expectation?

I did print the draft and looked through it, and it looks like a very thorough job from what I can see. Both of them are good.

I guess my personal opinion would be the Midway Landfill would be the more logical site because it's been a problem, eyesore, what to do with the past landfill, what to do with it.

A plan of this scale would probably solve that, but the biggest concern I have is that there's a community college up there and a lightrail station.

In the future there's going to be a village area, and it'll probably be apartment housing. It's a good place for the city to develop around.

This might be the right thing, but if you have something that's going to create a lot of noise contributing to the school and everything else where people live there, maybe it's not a good idea.

Owner(s):

Contact ID	Name	Type	Phones	Email
921798	Greg Greenstreet	Individual		gdgreenstreet@gmail.com

Communication ID: 472437 - OMF South virtual Draft EIS hearing verbal comment 2

Communication (3/24/2021)

OMF South virtual Draft EIS hearing verbal comment 2

Hello, I'm Tim, and I want to put in my vote for the Midway Landfill lot off of what was said previously here.

I think it is a place that is going to have the least effect on people because if we use the other two sites that are in Federal Way, there's going to be an effect on housing and there's going to be an effect on businesses.

Of course, housing is a huge issue, and for us to take away either one of the sites is going to remove a bunch of residential housing. We're going to be removing some businesses, especially in the 344th site. The least amount of personal effect or human effect is going to be with the Midway Landfill.

I understand the engineering issues with it. When it comes from an engineering standpoint, using either one, any one of the three different resolutions for the Midway Landfill, none of them sound really wonderful.

I get it, but we're not going to have also an environmental effect that hasn't already been done decades ago.

We're not going to have to deal with either of the streams like we're dealing with in the 344th or 336th Street site, and so this is why I'm voting for the Midway Landfill because of the least amount of personal and also environmental effects. Thank you.

Communication ID: 472438 - OMF South virtual Draft EIS hearing verbal comment 3

Communication (3/24/2021)

OMF South virtual Draft EIS hearing verbal comment 3

This is Suzanne, and thank you so much. Having fought for the warehouse campus for the last five years, having been on it since I was six years old, having lived in this city for the last 55 years, have you guys taken into consideration your 75 truck trips plus the additional roughly 800 that the IRG businesses' warehouses will also be impacting on our area?

320th, Highway 18 are both at maximum failure and have been for many, many years. We don't seem to be getting any relief there, and I'm concerned that we in the south end are just not going to be able to function.

We are not going to be able to manipulate our city. Our traffic manager tells us the next 10 years in the City of Federal Way will be an absolute nightmare as he drops his head and shakes it.

I'm a little nervous, and he was just talking about our 320th with the Sound Transit facility going in over there, so I'm very concerned as a resident over here in the south end.

How we are going to function unless you have taken into consideration the other developments' plans in this area and the limited road availability that we have at this point?

We don't seem to have many places to go, so that's just one of my questions. I'll be talking to Paul

I'm sure in the future about all sorts of great environmental stuff, so thank you so much you guys.

I really appreciate this, and I think this is a nice way to get things done, so thank you very much.

May I just say go Midway Landfill?

Owner(s):

Contact ID	Name	Type	Phones	Email
783396	Suzanne Vargo	Individual	253-835-3499 (Home)	zanyban@hotmail.com

Communication ID: 472440 - OMF South virtual Draft EIS hearing verbal comment 4

Communication (3/24/2021)

OMF South virtual Draft EIS hearing verbal comment 4

Hi, there. It's Margaret. The name Mott MacDonald is the name of the company that I work for, so it just signed me in that way, so apologies for that.

I am a resident of Federal Way and actually an engineer, so I follow all this stuff and appreciate the opportunity here to make a few statements.

Contrary to the prior speakers, I do not support the use of the Midway Landfill. I have some knowledge about what the problems are that are being experienced by the Federal Way construction link extension construction right now, and the expense it's causing.

I believe that Sound Transit should not own the fact that the Midway Landfill is contaminated and the extra cost of hundreds of millions of dollars to mitigate the contamination that is at that site.

There are many projects that are vying for a limited amount of money at this point. We've talked about the realignment.

There's many other communities who need similar lightrail extensions without any sort of contributions from the City of Seattle, who owns that site or others who have responsibility for that site. I don't think we should be selecting that site. I think there are two other sites that are equally viable.

I do understand the motivation behind getting that site covered and into a more useful condition, but not to the expense of other projects and maybe even the significant delay in this project with the additional costs and the time that it would take to earn the revenue to be able to address it, so thank you.

Communication ID: 472441 - OMF South virtual Draft EIS hearing verbal comment 5

Communication (3/24/2021)

OMF South virtual Draft EIS hearing verbal comment 5

I just wanted to thank you for the opportunity to let people speak with you tonight. I wish this was in person, but it is what it is.

I also wanted to be on record that the city council voted to support the OMF South at the Midway Landfill. The city council has sent two letters to the Sound Transit board in support of that decision. Members of the council have gone to board meetings to speak with Sound Transit in person when that was possible.

If this was to be built in Federal Way, we would lose housing. We would lose childcare, and we all know that with the pandemic, childcare has become a very real issue in which women, especially women have not been able to go to work because of lack of childcare.

We would lose businesses, and we have two businesses that we know may not be able to be replaced because it would be too difficult to find something that would be suitable for them to be rebuilt.

It would take away some money from our taxes here in Federal Way which support many, many things, and once again as a private citizen, I do support the Midway Landfill. I think it is the best site, and truly the only site that this should even be considered. Thank you very much.

Owner(s):

Contact ID	Name	Type	Phones	Email
890331	Susan Honda	Individual	253-293-8885 (Home)	susan.honda@cityoffederalway.com

Communication ID: 472442 - OMF South virtual Draft EIS hearing verbal comment 6

Communication (3/24/2021)

OMF South virtual Draft EIS hearing verbal comment 6

Thank you just for the opportunity here. I want to also share my opinion. I think that the Midway would make the most sense. I do appreciate some of the comments that it is a landfill. It would probably cost a lot to fix and to mediate.

At the same time that will have to be dealt with either way in the future, and I think that if you have a suitable site for such an operation as this, it would be great to take advantage of that to mediate at this time and to make things work.

I think it's also harder for the residents in the Federal Way site to have to deal with all these changes because now we are impacting homeowners and families who have to move out.

I personally have family there who are already retired, and it's very, very hard for them to be able to deal with this.

In addition, it is much easier I think to have the overall area pitch in in terms of taxes and any kind of costs that may be incurred versus having to impact and have all of this pressure weighed upon the shoulders of just a few families and a few businesses in that smaller area there. I thank you for the opportunity to share my opinion.

Communication ID: 472443 - OMF South virtual Draft EIS hearing verbal comment 7

Communication (3/24/2021)

OMF South virtual Draft EIS hearing verbal comment 7

First time to use this Zoom system, so bear with me. Regarding the Midway Landfill, I'm also for that. My whole family's for that.

When I look at the projects that Sound Transit has in work, the extension to West Seattle, Issaquah and these other sites or locations, the costs on your documentation are way more than the Midway Landfill.

If the Midway Landfill does end up costing more than the Federal Way sites, you need to put it in perspective, but it's far below what you're spending on other projects.

You need to step back, look at big pictures. It's not like it's just ominous over all the other constructions.

By building at Midway Landfill, you add jobs to the south end, and you do not take the jobs away from the location in Federal Way. One of your features is, yes, we bring in jobs, but going to Federal Way, yes, you delete jobs.

You replace some of those with your facility, so overall benefit to the south end to add a large increase in jobs instead of subtracting some to add yours. Thank you.

Communication ID: 472444 - OMF South virtual Draft EIS hearing verbal comment 8

Communication (3/30/2021)

OMF South virtual Draft EIS hearing verbal comment 8

One of the things I'm rather concerned about is the people that are affected by the EIS, especially the 346th area estimates do not seem to be a good way to share in how many jobs will be affected. They grossly undercount some of the parcels that are there. They put a little asterisk by it and say 11, but that area has branched down.

There's 67 separate parcels in that property, and they're owned by different people and to lump them into one is really unconscionable.

The other thing I would say as far as the jobs, it says 470 new jobs. It really doesn't count all the jobs that are being lost, and that's why it's important to get an actual count done.

If they could include how many jobs are being lost, that benefits greatly the decrease for the number of jobs, and the tax base that is lost choosing either 336th or 348th is significant to the City of Federal Way.

I would just strongly encourage people, despite the problems, to use the Federal Way landfill for the OMF South.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>880475</u>	<u>Arnold Dewalt</u>	Individual	253-850-7352 253-740-9666	<u>arnolddewalt@comcast.net</u>

Communication ID: 472445 - OMF South virtual Draft EIS hearing verbal comment 9

Communication (3/30/2021)

OMF South virtual Draft EIS hearing verbal comment 9

I appreciate the opportunity to make a couple of comments. I noticed the concern about the additional cost for the Midway Landfill site.

However, there should be additional resources available because of the fact this is a Superfund site. There is something called Brownfield money that may be called something else now, but in the past has been used to address similar kinds of conditions of property that is virtually unusable for any purpose without improvements and dealing with the damage that has been done to that property through the landfill.

I believe that using the Midway Landfill site would actually have a double benefit in providing a very good location in terms of its accessibility and its lack of causing business displacement or social displacement or other kinds of environmental concerns and problems, whereas both of the Federal Way locations have been found to result in social concerns and displacements, residential displacements, business displacements, employee reductions and environmental concerns in terms of the wetlands in terms of the forest and in terms of the streams with the network that's very present throughout that area, so indeed my strong recommendation would be the Midway Landfill site. Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
783384	Jeanne Burbidge	Individual		jeanneburbidge@comcast.net

Communication ID: 472446 - OMF South virtual Draft EIS hearing verbal comment 10

Communication (3/30/2021)

OMF South virtual Draft EIS hearing verbal comment 10

Thanks for this opportunity. I would just like to kind of say I think the Midway Landfill site probably does have a few things going for it without disrupting other folks and businesses. That's first and foremost.

I also wanted to comment or ask a question as to whether or not a waste conversion facility may have been thought about for this site, which may help clean up the site, create some economic opportunities possibly for Sound Transit, there being some definite benefits to the Kent and Federal Way areas and have the opportunity to create real sustainability, so I'm just wondering if that had been considered at all.

Communication ID: 472537 - Concerning the OMF South & S 344th St Federal Way.

Communication (4/1/2021)

Concerning the OMF South & S 344th St Federal Way

From: Cynthia <cynthiayvonne@comcast.net>

Sent: Thursday, April 1, 2021 3:18 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Cc: cynthiayvonne@comcast.net <cynthiayvonne@comcast.net>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

I believe the Midway Landfill would be the most appropriate site for a train yard. The site is already being used to build the infrastructure for the trains. It makes sense to continue to build up that site for the train yard and to not displace established neighborhoods, communities, homes and businesses.

Thank you.

Cynthia Phillips

33020 10th Ave SW Unit V101

Federal Way, Wa 98023

Owner(s):

Contact ID	Name	Type	Phones	Email
1025682	Cynthia Phillips	Individual		cynthiayvonne@comcast.net

Communication ID: 472538 - Sound transit OMF

Communication (4/5/2021)

Sound transit OMF

From: Cindy Broyles <boxercrazy@yahoo.com>

Sent: Monday, April 5, 2021 1:32:10 PM

To: OMF South Scoping <OMFsouthscoping@soundtransit.org>

Subject: Sound transit OMF

We have lived within 3 to 4 miles of site 10A for over 45 years in our home. I have made many friends that live within that site 10A and have visited some of the businesses too. There are a lot of people that have lived there for most of their lives and are elderly. These elderly people have no where else to go at this time in their lives and can not afford to move and start all over. There are also a lot of low income people that can't just pick up and move. All these people have found stability that they have never had before. It isn't right to take that away. There are also 3 churches within site 10A.

It is the only industrial site in Federal Way. You say you are going to add lots of jobs but you are taking jobs away from people that have been working at these companies earning job security and seniority and may not be hired some where else.

Elleno's has put millions of dollars into its facility to make the world's best yogurt factory. Other businesses have worked hard running their businesses to offer what this area needs. Please don't take the homes away from my friends. Also please don't make our business owners and employees lose their jobs so they can't support their families.

Please do not consider site10A & choose one of the other 2 sites.

Thank you
Cindy Broyles

Owner(s):

Contact ID	Name	Type	Phones	Email
879732	Cindy Broyles	Individual		boxercrazy@yahoo.com

Communication ID: 472726 - Protect federalway

Communication (4/5/2021)

Protect federalway

From: deborah mcgarry <celticemeraldivy@gmail.com>

Sent: Monday, April 5, 2021 3:02 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Protect federalway

Please do not take away my Church. I attend Christian Faith Center in Federal Way. Why would you take away a church who contributes to the community, instead of a land fill. The land fill would be better, making something ugly into something useful!! Please use the landfill!??????

Sincerely
Debi McGarry
Citizen of Federal Way

Owner(s):

Contact ID	Name	Type	Phones	Email
1025832	Deborah McGarry,	Individual		elticemeraldivy@gmail.com

Communication ID: 472727 - Public comment on Light Rail South Maintenance Facility - Midway Landfill

Communication (4/8/2021)

Public comment on Light Rail South Maintenance Facility - Midway Landfill

From: Sheryl DeTray <sheryl.detray@gmail.com>

Sent: Thursday, April 8, 2021 1:11 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Public comment on Light Rail South Maintenance Facility - Midway Landfill

I am a resident of Federal Way and greatly concerned about the two alternatives for the LR South Operations and Maintenance Facility proposed for Federal Way. Both options will negatively impact the fragile Hylebos Creek and wetlands ecosystem. Negative environmental impacts affect the local acreage and all the way down the watershed to where it drains directly into the Puget Sound. Both Federal Way locations also displace numerous residential, business and worship centers. The Christian Life Center is a large facility and would be difficult to relocate.

The Midway Landfill alternative is the best choice because it is already publicly owned and mostly vacant. As a Superfund site, I know it will be more expensive and take longer to prepare the site, but it is an excellent use of such property. Additionally, no mainline track needs to be built or maintained.

Federal Way is looking forward to having Light Rail coming to our city, but we do not want the negative environmental and social costs that are proposed.

Please choose the Midway Landfill alternative for the South Operations and Maintenance facility.

Thank you,
Sheryl DeTray
30225 18th Ave SW, Federal Way, WA 98023

Owner(s):

Contact ID	Name	Type	Phones	Email
1025834	Sheryl DeTray,	Individual		sheryl.detray@gmail.com

Communication ID: 472732 - OMF South DEIS OOH Comment 62

Communication (4/9/2021)

OMF South DEIS OOH Comment 62

After reading your three proposals I believe that the best solution and best choice for them would be the midway site because there's less people affected and less businesses affected. Thank you

Owner(s):

Contact ID	Name	Type	Phones	Email
1025839	Terri Tollie	Individual		pineconehut@yahoo.com

Communication ID: 472735 - OMF South DEIS OOH Comment 61

Communication (4/9/2021)

OMF South DEIS OOH Comment 61

The 336th street site should be the selected site. The Midway Landfill site has the highest cost, highest probability of significant cost overruns due to unknowns regarding the landfill and the longest construction time. The 344th site displaces more businesses and employees along with more residential displacements. The impact to streams and wetlands is similar for the 336th and 344th sites. The 336th site has less of an impact on businesses and residents than the other options for approximately the same amount of money as the 344th site are the reasons for choosing the 336th site as the preferred site.

Owner(s):

Contact ID	Name	Type	Phones	Email
890557	Becky Tougher	Individual	253-941-3172	tougherb@gmail.com

Communication ID: 472737 - OMF South DEIS OOH Comment 60

Communication (4/9/2021)

OMF South DEIS OOH Comment 60

It appears that the midway site will have the least amount of disruption on peoples dwellings, businesses, the environment (Hylebos drainage system), and traffic flow in the city of Federal Way which also increases the carbon emissions. This is where I believe it should be built.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025840	Arthur McIrvin	Individual		artmcirvin@hotmail.com

Communication ID: 472738 - OMF South DEIS OOH Comment 59

Communication (4/9/2021)

OMF South DEIS OOH Comment 59

The human impact of placing the OMF in Federal Way will be devastating beyond any differences in cost to mitigate use of the Midway landfill site. As an engineer I seriously question the cost estimates as well as the potential to get federal super site funding. It could actually cost our taxpayers less in the long run. I would strongly recommend discussions with our Congressional delegation and even President Biden to include the Midway site in the Infrastructure Bill. Thank you

Owner(s):

Contact ID	Name	Type	Phones	Email
889760	Bruce Honda	Individual	253-279-0273	Hondabg@hotmail.com

Communication ID: 472739 - OMF South DEIS OOH Comment 58

Communication (4/9/2021)

OMF South DEIS OOH Comment 58

I believe that the Midway site is the best alternative, despite additional costs and time to construct. This landfill site is contaminated and a blight to S. King Co. The construction of an OMF site would bring the property up to its highest and best use without impacting the lives of King Co residents. Perhaps additional federal money could be accessed for this site.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025841	Susan Johnson	Individual		susanbjohnson998@gmail.com

Communication ID: 472740 - OMF South DEIS OOH Comment 57

Communication (4/9/2021)

OMF South DEIS OOH Comment 57

The Midway Landfill Alternative should be advanced as the preferred alternative site. The impact on the neighborhood and community members is much more favorable than removing neighbors from their homes at the other alternative sites.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025842	Denali Pavlich-Wheeler	Individual		d.pav@msn.com

Communication ID: 472741 - OMF South DEIS OOH Comment 56

Communication (4/9/2021)

OMF South DEIS OOH Comment 56

I propose taking the Church property. I will explain my thoughts and how I got to that decision: Of the three sites I favor the Landfill site but I'm concerned about the vast cost differential this site will require. San Diego has a runway on landfill so we know it can be done. I'm not sure post-pandemic our region can afford the extra cost. The industrial business loss to the City of Federal Way would be a huge impact - far beyond the dollars quoted. Those jobs will be lost, a number of the families probably would leave the city for jobs elsewhere. I'm not willing to take that chance. We need all the home-grown businesses we have. We are trying to end our legacy of being a just a bedroom community for other bigger cities like Seattle and Tacoma. That leaves the Church property. Christian Faith Center has moved a number of times in its existence. It can move again without harm to the church community. They will be compensated for the infrastructure and they are free to reinvest in other property. The true "church" is its people, its community of believers, not the building. Please, I urge you to take the Church property so as to do the least harm to our City.

Owner(s):

Contact ID	Name	Type	Phones	Email
880532	AnnMichelle Hart	Individual		ann.hart.law@gmail.com

Communication ID: 472818 - Comment on the Maintenance Sight Selection

Communication (4/9/2021)

Comment on the Maintenance Sight Selection

From: Bobl Dockstader <redsquirrel01@hotmail.com>

Sent: Friday, April 9, 2021 12:39 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Comment on Maintenance Sight Selection

I believe that the only responsible option for Sound Transit's south maintenance facility is the Midway landfill sight. It minimizes commercial and residential disruption. Further, I understand that US Government funds are available for remediation of the site.

The Midway site is truly the responsible choice.

Robert A Dockstader
1907 Parkview Drive NE
Tacoma WA 98422

[Present and future light rail user]

Owner(s):

Contact ID	Name	Type	Phones	Email
1025896	Robert Dockstader	Individual		redsquirrel10@hotmail.com

Communication ID: 472819 - South OMF Site

Communication (4/9/2021)

South OMF Site

From: Michael Brugato <mbrugato@gmail.com>

Sent: Friday, April 9, 2021 1:45 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Cc: Ferrell, Jim <Jim.Ferrell@cityoffederalway.com>; council@cityoffederalway.com <council@cityoffederalway.com>

Subject: South OMF Site

Sound Transit is currently considering potential alternatives for the location of the new South Operations and Maintenance Facility (OMF). The focus seems to be narrowing on two of them: South 336th Street and South 344th Street. This, to me, appears a willful disregard to local area communities when a much more logical alternative exists: use of the Kent Midway Landfill site.

The 336th & 344th Street alternatives are detrimental to the local community with regard to housing and business displacement. The resulting disruption serves to negate much of the positive impact the OMF would have on providing more jobs to the area. Additionally, an OMF in the 336th or 344th Street sites would have a detrimental impact on Hylebos Creek. Building the OMF on the Midway Landfill site would eliminate displacement of residents and businesses further enhancing the OMF's benefits to local communities. Use of the landfill site returns a formerly polluted location to productive use instead of doing environmental harm to another area.

The Kent Midway Landfill Superfund Site has been deemed "Site Ready for Reuse and Redevelopment" since 2007. One of the goals of Superfund Cleanup is to return a site to productive use. What better use for this particular site? The eastern perimeter of the site is already being developed for the widening of I-5 and the Federal Way Link Light Rail Extension Project. To use the site to further support our region's transportation infrastructure by choosing it as the South OMF site is a logical next step.

Developing the Midway Landfill Superfund site will be more expensive in the short term, but the long term benefits brought about by added OMF jobs without disruption to local communities and their ecosystems is more than worth that cost.

Investing in the South OMF at the Kent Midway Landfill site now is not only the right thing to do, it is a social, economic and ecological imperative.

Owner(s):

Contact ID	Name	Type	Phones	Email
1025897	Michael Brugato	Individual		mbrugato@gmail.com

Communication ID: 472820 - South King County OMF Site - Kent Midway Landfill

Communication (4/9/2021)

South King County OMF Site - Kent Midway Landfill

From: Karen Brugato <karenbrugato@gmail.com>

Sent: Friday, April 9, 2021 4:21 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Cc: Shinbo Sandy <sandyshinbo@comcast.net>

Subject: South King County OMF Site - Kent Midway Landfill

April 09, 2021

Dear Sound Transit,

Please consider using the Midway Landfill for your maintenance base. Reclaiming the land would benefit our entire area and show that you are indeed interested in the environment. The other two locations suggested would have a tragic impact on our little community and could possibly cause damage to the Hylebos Wetlands we have ferociously protected and cared for while developing the Federal Way community.

Please think of our children, our community, and our future. Choose the Midway Landfill.

Thank you,

Sandy Shinbo

27827 38th Place S.

Auburn, WA 98001

(Federal Way School District)

Owner(s):

Contact ID	Name	Type	Phones	Email
1025898	Sandy Shinbo	Individual		sandyshinbo@comcast.net

Communication ID: 472853 - 344th Site

Communication (4/12/2021)

344th Site

From: Ken Broyles <aog9354@yahoo.com>

Sent: Monday, April 12, 2021 3:14 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: 344th Site

Why is GarageTown on site 10A listed as one property when we have 57 owners that pay taxes on 67 garages? It seems very unfair with the numbers on the Draft EIS process. These garages are an extension to our homes. There are businesses operating within Garage Town also.

Best Regards, Kenneth Broyles

Owner(s):

Contact ID	Name	Type	Phones	Email
890500	Ken Broyles	Individual	253-312-5603	aog9354@yahoo.com

Communication ID: 472854 - OMF South Train Yard belongs at the Kent Landfill

Communication (4/12/2021)

OMF South Train Yard belongs at the Kent Landfill

From: Edward Etheridge <tedethjr@hotmail.com>

Sent: Monday, April 12, 2021 3:10 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>; Email The Board <EmailTheBoard@soundtransit.org>

Subject: OMF South Train Yard belongs at the Kent Landfill

To whom it may concern:

The Sound Transit railyard belongs at the Kent Midway Landfill.

A mature Superfund landfill next to a busy freeway & major arterial (Pacific Highway South) will have no better opportunity for it to be repurposed in the foreseeable future.

Too contaminated for housing. Too close to the freeway for ball fields. Too small for a golf course (and too noisy). And course the poorly designed cap – shaped to save the PRPs money while limiting future use (which they have no interest in).

Putting the railyard at another location would repeat the eco-imperialism that brought forth this Superfund site to begin with – another example of Seattle (then city of Seattle, now Sound Transit) trying to export their problems to other cities while retaining the benefits for themselves.

The additional costs beyond what Sound Transit wants to pay should be the responsibility of the PRP (city of Seattle), the EPA, the Washington State Department of Ecology and the Washington State Department of Transportation who during the Superfund process helped create an unmanageable landfill cap to begin with.

Thanks,

Ted Etheridge

Owner(s):

Contact ID	Name	Type	Phones	Email
1025922	Edward Etheridge	Individual		tedethjr@hotmail.com

Communication ID: 472869 - Comments on the Sound Transit Maintenance Facility Selection

Communication (4/12/2021)

Comments on the Sound Transit Maintenance Facility Selection

From: Peter B. <md11skipper@yahoo.com>

Sent: Monday, April 12, 2021 6:52 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: My comments about the soundtransit maintenance facility selection

To whom it may concern

- The Draft EIS did not specifically include GT owners as residential or business. All 58 Garage Town owners should be included as property owners. All GT owners will be displaced if the S 344th site is selected.
- How was the evaluation criteria weighed. If all criteria are weighted equally, then Midway landfill should be the preferred site.
- The South 344th Site generates the most Economic activity, real estate tax and other taxes, compared to the other two sites. The landfill Site and The Christian Faith Center are not on the tax rolls.
- Table 3.3-2 in the DEIS, should be changed to include an accurate parcel count, all GT condo parcels should be included. The S 336th Street site has 19 tax parcels; The S 344th Street site has 109 tax parcels.
- If the South 344th Street is chosen 248 people will lose their jobs, 94 jobs will be lost if the 336th Street site is chosen.
- The Draft EIS did not mention that The Christian Faith Center may want to sell the property. Sound Transit needs to be in conversation with The Christian Faith Center to confirm their desire to sell the property.
- The S 344th Street site is close to the South Federal Way Station and therefore should be considered for Transit oriented development and not considered for the OMF South.
- No mention of possible EPA or other Federal or State Grants to lower cost of the Landfill site.
- Many of the sections of the Draft EIS included numbers and language that included information about the Main Line Extension which made it difficult to look at differences between the S 336th Street site and the S 344th Street sites.
- The Draft EIS did not clearly say that there will be significantly fewer truck trips and less site work on the S 336th Street site. The site work on the S 336th Street site has the lowest impact of all three sites.
- The Full Excavation option for the Midway Landfill site, is not much more costly than the other sites and has fewer negative impacts. This site is favored by most Cities and individuals, and should be selected as the preferred OMF Site.
- GT cannot be rebuilt in King County at a reasonable cost received from Sound Transit. and there is no existing property in King County like GT. Community would be destroyed.
- It would be extremely difficult and cost prohibitive to relocate the Ellenos Yogurt facility and maintain delivery to customers. If the South 344th Street site is chosen Ellenos Yogurt would go out of business.
- The Executive Summary of the DEIS reflects that the environmental impacts of the 336th Site and the S 344th sites are about the same. It does not reflect that the selection of the 344th Site would require the conversion of the Washington DOT Reserve Conservation Area and retention pond adjacent to I-5 being relocated to an additional parcel to the south of 344th street, which is not included in many of the site maps for The 344th site.
- If The Sound Transit Board decides not to construct Tacoma Dome Link Extension, selection of the S 336th and S 344th sites would require excess mainline track to be constructed.
- The Draft EIS states, on page 3.6-9: " The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared with the other build alternatives." This statement of fact was not in the DEIS Executive Summary, and it should be included.
- There are 3 churches located within the S 344th Street site. Is it better to disrupt three churches or 1 church?
- Existing street improvements to the S 344th Street site, not adequate to serve the OMF. Significant improvements to S 344th and S 342nd streets would have to be made. This issue was not addressed in the DEIS

Thank you,

Peter Broda
Garage Town owner unit A7

Owner(s):

Contact ID	Name	Type	Phones	Email
1023814	Peter Broda	Individual		md11skipper@me.com

Communication ID: 472870 - Public comments to Sound Transit Draft against the Garage Town site

Communication (4/13/2021)

Public comments to Sound Transit Draft against the Garage Town site

From: Jerry Carr <jerry.carr@gmail.com>

Sent: Tuesday, April 13, 2021 7:05 AM

To: Email The Board <EmailTheBoard@soundtransit.org>; OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Public comments to Sound Transit Draft Against the Garage Town site

I would like to add my voice to the public comments against the Garage Town site for the following reasons.

·The Draft EIS did not specifically include GT owners as residential or business. All 58 Garage Town owners should be included as property owners. All GT owners will be displaced if the S 344thsite is selected.

* Ask how evaluation criteria is weighted. If all criteria are weighted equally, then Midway landfill should be the preferred site.

·The South 344thSite generates the most Economic activity, real estate tax and other taxes, compared to the other two sites. The landfill Site and The Christian Faith Center are not on the tax rolls.

·Table 3.3-2 in the DEIS, should be changed to include an accurate parcel count, all GT condo parcels should be included. The S 336thStreet site has 19 tax parcels; The S 344thStreet site has 109 tax parcels.

·If the South 344thStreet is chosen 248 people will lose their jobs, 94 jobs will be lost if the 336thStreet site is chosen.

*The Draft EIS did not mention that The Christian Faith Center may want to sell the property. Sound Transit needs to be in conversation with The Christian Faith Center to confirm their desire to sell the property.

·The S 344thStreet site is close to the South Federal Way Station and therefore should be considered for Transit oriented development and not considered for the OMF South.

*No mention of possible EPA or other Federal or State Grants to lower cost of the Landfill site.

·Many of the sections of the Draft EIS included numbers and language that included information about the Main Line Extension which made it difficult to look at differences between the S 336thStreet site and the S 344thStreet sites.

·The Draft EIS did not clearly say that there will be significantly fewer truck trips and less site work on the S 336thStreet site. The site work on the S 336thStreet site has the lowest impact of all three sites.

*The Full Excavation option for the Midway Landfill site, is not much more costly than the other sites and has fewer negative impacts. This site is favored by most Cities and individuals, and should be selected as the preferred OMF Site.

*GT cannot be rebuilt in King County at a reasonable cost received from Sound Transit. and there is no existing property in King County like GT. Community would be destroyed.

·It would be extremely difficult and cost prohibitive to relocate the Ellenos Yogurt facility and maintain delivery to customers. If the South 344thStreet site is chosen Ellenos Yogurt would go out of business.

·The Executive Summary of the DEIS reflects that the environmental impacts of the 336thSite and the S 344thsites are about the same. It does not reflect that the selection of the 344thSite would require the conversion of the Washington DOT Reserve Conservation Area and retention pond adjacent to I-5 being relocated to an additional parcel to the south of 344thstreet, which is not included in many of the site maps for The 344thsite.

·If The Sound Transit Board decides not construct Tacoma Dome Link Extension, selection of the S 336thand S 344thsites would require excess mainline track to be constructed.

·The Draft EIS states, on page 3.6-9: " The South 344thStreet alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared with the other build alternatives." This statement of fact was not in the DEIS Executive Summary, and it should be included.

·There are 3 churches located within the S 344thStreet site. Is it better to disrupt three churches or 1 church?

·Existing street improvements to the S 344thStreet site, not adequate to serve the OMF.

Significant improvements to S 344thand S 342ndstreets would have to be made. This issue was not addressed in the DEIS

--

_Regards, Jerry A. Carr _

_Owner of B-21 _Garage Town

COO J.H. Carr and Sons

_Capt. Braniff Airlines, Alaska Airlines, Cascade Airways, USN _

Owner(s):

Contact ID	Name	Type	Phones	Email
886919	Jerry A Carr	Individual		jerry.carr@gmail.com - jerry.carr@outlook.com

Communication ID: 472933 - Sound Transit Location

Communication (4/13/2021)

Sound Transit Location

From: tONI Findt <Findttlc@hotmail.com>

Sent: Tuesday, April 13, 2021 9:36 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Location

We believe that the Midway Landfill is the best location for this project. Give the unused property a purpose. Accessing super fund dollars for cleanup will lower costs.

The Midway Landfill needs to be cleaned . If not now for this project, later for some other and at a higher cost.

Midway Landfill location dose not disrupt our places of worship, jobs and green spaces we value so much !

Respectfully

Bruce and Toni Findt of Federal Way WA

Owner(s):

Contact ID	Name	Type	Phones	Email
1025972	Bruce Findt	Individual		Findttlc@hotmail.com
1025973	Toni Findt	Individual		Findttlc@hotmail.com

Communication ID: 472934 - Concerning the OMF South & S 344th St Federal Way.

Communication (4/13/2021)

Concerning the OMF South & S 344th St Federal Way

From: Scott Carson <scott.carson46@yahoo.com>

Sent: Tuesday, April 13, 2021 10:00 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,
I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.
Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.
Thank you.

Owner(s):

Contact ID	Name	Type	Phones	Email
880543	Scott Carson	Individual	253-839-4274 206-450-2233	scott.carson46@yahoo.com

Communication ID: 472935 - Errors in the OMF South Draft EIS

Communication (4/13/2021)

Errors in the OMF South Draft EIS

From: Edward Miller <mill425@comcast.net>

Sent: Tuesday, April 13, 2021 10:16 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Errors in the OMF South Draft EIS

The Draft EIS does not correctly count the number of property owners and businesses that would be impacted by building the OMFS on the South 344th site.

The Garage Town facility at 2010 S 344th Street is a condominium consisting of 67 individually-owned tax parcels. The Draft EIS does not classify Garage Town owners as commercial owners or residential owners and these individuals are not included in the count of property owners or parcels (even though occupants of a 4 plex were so counted). See Table ES-1 on page ES-17 of the Executive Summary. The table only shows 20 Residential and 11 Business Displacements for the entire South 344th Street Site. Garage Town alone has 67 separate individual Condominium parcels and owners. Also see Table 3.5-5 in the Draft EIS.

This inaccurate count distorts the true number of individuals impacted in the data for the South 344th Street site contained in the Executive Summary. These inaccuracies must be corrected before the final EIS is completed so that the true scope of the impact on the Federal Way community is known before the "preferred alternative" is selected.

In addition, there is no indication in the Draft EIS that there is NO other facility like Garage Town in the Puget Sound area. Relocation of those property owners is not feasible because there is NO equivalent facility for them to move into. Multiple businesses, landlords, and private owners would be eliminated from the community as a result. This adverse impact on the community should be clearly stated in the final EIS so that this undesirable outcome can be properly taken into account as the final siting decision is made.

Thank you for your attention in this matter.

Sincerely,

Edward C. Miller

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1023384</u>	<u>Edward Miller</u>	Individual		<u>mill425@comcast.net</u>

Communication ID: 472936 - New Sound Transit Site

Communication (4/13/2021)

New Sound Transit Site

From: Yvonne Fors <yvonnef@ashtoncorp.com>

Sent: Tuesday, April 13, 2021 2:43 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: New Sound Transit Site

I am writing to ask that you take the Garage Town Site (S 344thsite) off of your list of potential locations.

There are several reasons for this request as a life time resident in the Puget Sound area I have had to look at the Midway landfill and it would only make sense to use a location as the next Transit Site.

Not only is Garage Town a very new development, but it is a location that affects 58 households whether for business or personal use and would create a hardship for all owners to find a new location especially as construction costs have skyrocketed and property values have continued to go up.

From an economic reason Garage Town is the only site that provides real estate and other taxes (S 344thstreet has 109 tax parcels) compare to the landfill site and Christian Faith Center site that has exemptions.

Christian Faith Center has shown interest in selling their site and would make it a win win for both buyer and seller.

It does not make sense for Sound Transit to pick a location where people will be losing their jobs and businesses (S 344thSite) compared to two other locations (landfill and Christian Faith Center) that would not affect businesses and employment.

For these reasons, I believe it is very clear that the S 344thsite should no longer be a consideration for the new Sound Transit Location.

Yvonne Fors
1201 Monster Road SW
Suite 350
Renton, WA 98057
206-575-8436 (fax) 206-575-8510

Owner(s):

Contact ID	Name	Type	Phones	Email
1025974	Yvonne Fors	Individual	+1 (206) 575-8436	yvonnef@ashtoncorp.com

Communication ID: 473469 - Save Federal Way Jobs and Home

Communication (4/14/2021)

Save Federal Way Jobs and Home

From: Ron Anderson <rjander@yahoo.com>

Sent: Wednesday, April 14, 2021 8:20 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Save Federal Way Jobs and Homes

The Draft EIS does not correctly count the number of property owners and businesses that would be impacted by building the OMFS on the South 344th site.

The Garage Town facility at 2010 S 344th Street is a condominium consisting of 67 individually-owned tax parcels. The Draft EIS does not classify Garage Town owners as commercial owners or residential owners and these individuals are not included in the count of property owners or parcels (even though occupants of a 4 plex were so counted). See Table ES-1 on page ES-17 of the Executive Summary. The table only shows 20 Residential and 11 Business Displacements for the entire South 344th Street Site. Garage Town alone has 67 separate individual Condominium parcels and owners. Also see Table 3.5-5 in the Draft EIS.

This inaccurate count distorts the true number of individuals impacted in the data for the South 344th Street site contained in the Executive Summary. These inaccuracies must be corrected before the final EIS is completed so that the true scope of the impact on the Federal Way community is known before the "preferred alternative" is selected.

In addition, there is no indication in the Draft EIS that there is NO other facility like Garage Town in the Puget Sound area. Relocation of those property owners is not feasible because there is NO equivalent facility for them to move into. Multiple businesses, landlords, and private owners would be eliminated from the community as a result. This adverse impact on the community should be clearly stated in the final EIS so that this undesirable outcome can be properly taken into account as the final siting decision is made.

Thank you for your attention in this matter.

Sincerely,

Ron Anderson
Garage Town Federal Way Owner

Owner(s):

Contact ID	Name	Type	Phones	Email
943728	Ron Anderson	Individual		

Communication ID: 473470 - Public comment on OMF South DEIS

Communication (4/15/2021)

Public comment on OMF South DEIS

From: phaighx2@aol.com <phaighx2@aol.com>

Sent: Thursday, April 15, 2021 9:49 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Public comment

April 19, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue. Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
- 3)The Midway Landfill site has minimal business displacement.
- 4)The Midway Landfill site impacts zero residences.
- 5)The Midway Landfill site does not impact streams.
- 6)The Midway Landfill site does not impact wetlands.
- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway

Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 334th St. should be eliminated from consideration.

Sincerely,
P.L.Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
883068	Patty Haigh	Individual	253-848-3709	phaighx2@aol.com

Communication ID: 473471 - Public comment on OMF South DEIS

Communication (4/16/2021)

Public comment on OMF South DEIS

From: joesvan1@aol.com <joesvan1@aol.com>

Sent: Thursday, April 15, 2021 9:52 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Public Comment

April 15, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives." Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

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Sincerely,
Patrick Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
883072	Patrick Haigh	Individual		joesvan1@aol.com

Communication ID: 473472 - Public comment on OMF South DEIS

Communication (4/15/2021)

Public comment on OMF South DEIS

From: crazynancy3388@aol.com <crazynancy3388@aol.com>

Sent: Thursday, April 15, 2021 9:58 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Public comment

April 15,2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility.

However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

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Sincerely,
Nancy Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>883071</u>	<u>Nancy Haigh</u>	Individual		<u>crazynancy3388@aol.com</u>

Communication ID: 473473 - Public comment on OMF South DEIS

Communication (4/15/2021)

Public comment on OMF South DEIS

From: M Haigh <mlhaigh15@aol.com>

Sent: Thursday, April 15, 2021 10:43 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Comment on OMF South

April 19,2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility.

However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

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The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

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- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

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Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 334th St. should be eliminated from consideration.

Sincerely,
M.Louise Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026086</u>	<u>M. Louise Haigh</u>	Individual		<u>mlhaigh15@aol.com</u>

Communication ID: 473475 - OMF South DEIS Public Comment

Communication (4/15/2021)

OMF South DEIS Public Comment

April 15, 2021

To Whom It May Concern:

The S 344th site should not be chosen for the train yard. The following reasons explain why:

- The Draft EIS did not specifically include Garage Town owners as residential or business. All 58 Garage Town owners should be included as property owners. All GT owners will be displaced if the S 344th site is selected.
- How was the evaluation criteria is weighted? If all criteria are weighted equally, then Midway landfill should be the preferred site.
- The South 344th Site generates the most economic activity, real estate tax and other taxes, compared to the other two sites. The landfill site and The Christian Faith Center are not on the tax rolls.
- Table 3.3-2 in the DEIS, should be changed to include an accurate parcel count, all Garage Town condo parcels should be included. The S 336th Street site has 19 tax parcels; The S 344th Street site has 109 tax parcels.
- If the South 344th Street is chosen 248 people will lose their jobs, 94 jobs will be lost if the 336th Street site is chosen.
- The Draft EIS did not mention that The Christian Faith Center may want to sell the property. Sound Transit needs to be in conversation with The Christian Faith Center to confirm their desire to sell the property.
- The S 344th Street site is close to the South Federal Way Station and therefore should be considered for Transit oriented development and not considered for the OMF South.
- No mention of possible EPA or other Federal or State Grants to lower cost of the Landfill site.
- Many of the sections of the Draft EIS included numbers and language that included information about the Main Line Extension which made it difficult to look at differences between the S 336th Street site and the S 344th Street sites.
- The Draft EIS did not clearly say that there will be significantly fewer truck trips and less site work on the S 336th Street site. The site work on the S 336th Street site has the lowest impact of all three sites.
- The Full Excavation option for the Midway Landfill site, is not much more costly than the other sites and has fewer negative impacts. This site is favored by most Cities and individuals and should be selected as the preferred OMF Site.
- Garage Town cannot be rebuilt in King County at a reasonable cost received from Sound Transit. There is no existing property in King County like Garage Town. Community would be destroyed.
- It would be extremely difficult and cost prohibitive to relocate the Ellenos Yogurt facility and maintain delivery to customers. If the South 344th Street site is chosen Ellenos Yogurt would go out of business.
- The Executive Summary of the DEIS reflects that the environmental impacts of the 336th Site and the S 344th sites are about the same. It does not reflect that the selection of the 344th Site would require the conversion of the Washington DOT Reserve Conservation Area and retention pond adjacent to I-5 being relocated to an additional parcel to the south of 344th street, which is not included in many of the site maps for the 344th site.
- If The Sound Transit Board decides not construct Tacoma Dome Link Extension, selection of the S 336th and S 344th sites would require excess mainline track to be constructed.
- The Draft EIS states, on page 3.6-9: "The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared with the other build alternatives." This statement of fact was not in the DEIS Executive Summary, and it should be included.
- There are 3 churches located within the S 344th Street site. Is it better to disrupt three churches or 1 church?
- Existing street improvements to the S 344th Street site, not adequate to serve the OMF. Significant improvements to S 344th and S 342nd streets would have to be made. This issue was not addressed in the DEIS

Please do not choose the S 344th Street site. It is the wrong choice.

Tim and Lisa Kittilsby

206-999-8494

lisak@gravelpits.com

timk@gravelpits.com

Documents: Document1.docx

Owner(s):

Contact ID	Name	Type	Phones	Email
1023029	Lisa Kittilsby	Individual		lisak@gravelpits.com

Communication ID: 473486 - Sound Transit Operations and Maintenance Facility

Communication (4/16/2021)

Sound Transit Operations and Maintenance Facility

From: Paul Griggs <paul.griggs@yahoo.com>

Sent: Monday, April 12, 2021 6:23 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Sound Transit South Operations and Maintenance Facility

Hello,

As a long time property owners at Garage Town, we would like to point out critical conditions that must be addressed in the consideration of the site selection for the Sound Transit South Operations and Maintenance Facility.

- The Draft EIS did not specifically include GT owners as residential or business. All 58 Garage Town owners should be included as property owners. All GT owners will be displaced if the S 344th site is selected.
 - Ask how evaluation criteria is weighted. If all criteria are weighted equally, then Midway landfill should be the preferred site.
 - The South 344th Site generates the most Economic activity, real estate tax and other taxes, compared to the other two sites. The landfill Site and The Christian Faith Center are not on the tax rolls.
 - Table 3.3-2 in the DEIS, should be changed to include an accurate parcel count, all GT condo parcels should be included. The S 336th Street site has 19 tax parcels; The S 344th Street site has 109 tax parcels.
 - If the South 344th Street is chosen 248 people will lose their jobs, 94 jobs will be lost if the 336th Street site is chosen.
 - The Draft EIS did not mention that The Christian Faith Center may want to sell the property. Sound Transit needs to be in conversation with The Christian Faith Center to confirm their desire to sell the property.
 - The S 344th Street site is close to the South Federal Way Station and therefore should be considered for Transit oriented development and not considered for the OMF South.
 - No mention of possible EPA or other Federal or State Grants to lower cost of the Landfill site.
 - Many of the sections of the Draft EIS included numbers and language that included information about the Main Line Extension which made it difficult to look at differences between the S 336th Street site and the S 344th Street sites.
 - The Draft EIS did not clearly say that there will be significantly fewer truck trips and less site work on the S 336th Street site. The site work on the S 336th Street site has the lowest impact of all three sites.
 - The Full Excavation option for the Midway Landfill site, is not much more costly than the other sites and has fewer negative impacts. This site is favored by most Cities and individuals, and should be selected as the preferred OMF Site.
 - GT cannot be rebuilt in King County at a reasonable cost received from Sound Transit. and there is no existing property in King County like GT. Community would be destroyed.
 - It would be extremely difficult and cost prohibitive to relocate the Ellenos Yogurt facility and maintain delivery to customers. If the South 344th Street site is chosen Ellenos Yogurt would go out of business.
 - The Executive Summary of the DEIS reflects that the environmental impacts of the 336th Site and the S 344th sites are about the same. It does not reflect that the selection of the 344th Site would require the conversion of the Washington DOT Reserve Conservation Area and retention pond adjacent to I-5 being relocated to an additional parcel to the south of 344th street, which is not included in many of the site maps for The 344th site.
 - If The Sound Transit Board decides not construct Tacoma Dome Link Extension, selection of the S 336th and S 344th sites would require excess mainline track to be constructed.
 - The Draft EIS states, on page 3.6-9: " The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared with the other build alternatives." This statement of fact was not in the DEIS Executive Summary, and it should be included.
 - There are 3 churches located within the S 344th Street site. Is it better to disrupt three churches or 1 church?
 - Existing street improvements to the S 344th Street site, not adequate to serve the OMF. Significant improvements to S 344th and S 342nd streets would have to be made. This issue was not addressed in the DEIS
- Thank you for your attention.
- We are confident that after thoughtful analysis and consideration, it will be determined that the South 344th Street alternative is the least viable site for the Sound Transit South Operations and Maintenance Facility.
- Sincerely,
Paul and Teena Griggs

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>886954</u>	<u>Paul B Griggs</u>	Individual		<u>paul.griggs@yahoo.com</u>
<u>1026097</u>	<u>Tina Griggs</u>	Individual		

Communication ID: 473487 - Environmental Impact Statement Comments

Communication (4/13/2021)

Environmental Impact Statement Comments

From: Scott Carson <scott.carson46@yahoo.com>**Sent:** Tuesday, April 13, 2021 10:25 AM**To:** Email The Board <EmailTheBoard@soundtransit.org>**Subject:** Environmental Impact Statement Comments

Good morning,

As a potentially affected property owner of the OMF South project I would like to offer a couple of comments/concerns relative to the recently released draft environmental impact statement. I will begin my comments by saying I believe the correct decision would be the Midway site. I fully recognize the potential issues associated with this site but also believe not all avenues associated with mitigation (such as state and/or federal support) have been investigated.

As a property owner affected by the 344thsite, I am dismayed that we do not get included as affected property owners because we are "not residents". The 55 + owners of individual condominium garages in the GarageTown complex have, in fact, invested hundreds of thousands of dollars in their units and yet do not get represented as "affected". We pay property taxes on those units, we maintain them and conduct daily activities, in many cases, at those units. Those interests and investments are not addressed in the draft statements and that is grossly unfair to the affected owners.

The second concern I have as a resident of the Federal Way community is the very adverse impact the 344thsite would have on the community. The draft document addresses the number of new jobs and the volume of activity the OMF would create. It does not address the very restricted access to the 344thsite and the adverse impact to businesses in the area. The 334thsite is the only one of the three sites that does not have direct access from Hwy 99. The access routes to the 344thsite is via three two lane avenues. If the plan is to improve access, those costs should be included in the cost of developing the site and not added as an afterthought.

As has been stated in a number of public comments that I have made over the last two years or so, the impact to our community is not being adequately addressed. Neighborhoods are being directly affected by property condemnation, noise pollution, environmental challenges, and loss of small businesses which are the heart and sole of our community.

The Board has an opportunity to do the right thing for the long term benefit of the region by choosing to mitigate the Midway site and turn a community eyesore into productive real estate. Thank you for taking the time to understand the Communities concerns and the concerns of the property owners that support this community.

Scott Carson

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>880543</u>	<u>Scott Carson</u>	Individual	253-839-4274 206-450-2233	<u>scott.carson46@yahoo.com</u>

Communication ID: 473489 - OMF South

Communication (4/13/2021)

OMF South

From: Ron Anderson <rjander@yahoo.com>

Sent: Wednesday, April 14, 2021 8:24 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: OMF South

Board members,

The Draft EIS does not correctly count the number of property owners and businesses that would be impacted by building the OMFS on the South 344th site.

The Garage Town facility at 2010 S 344th Street is a condominium consisting of 67 individually-owned tax parcels. The Draft EIS does not classify Garage Town owners as commercial owners or residential owners and these individuals are not included in the count of property owners or parcels (even though occupants of a 4 plex were so counted). See Table ES-1 on page ES-17 of the Executive Summary. The table only shows 20 Residential and 11 Business Displacements for the entire South 344th Street Site. Garage Town alone has 67 separate individual Condominium parcels and owners. Also see Table 3.5-5 in the Draft EIS.

This inaccurate count distorts the true number of individuals impacted in the data for the South 344th Street site contained in the Executive Summary. These inaccuracies must be corrected before the final EIS is completed so that the true scope of the impact on the Federal Way community is known before the "preferred alternative" is selected.

In addition, there is no indication in the Draft EIS that there is NO other facility like Garage Town in the Puget Sound area. Relocation of those property owners is not feasible because there is NO equivalent facility for them to move into. Multiple businesses, landlords, and private owners would be eliminated from the community as a result. This adverse impact on the community should be clearly stated in the final EIS so that this undesirable outcome can be properly taken into account as the final siting decision is made.

Thank you for your attention in this matter.

Sincerely,

Ron Anderson
Garage Town Federal Way Owner

Owner(s):

Contact ID	Name	Type	Phones	Email
943728	Ron Anderson	Individual		

Communication ID: 473494 - O & M South

Communication (4/15/2021)

O & M South

From: Suzanne Vargo <zanyban@hotmail.com>

Sent: Thursday, April 15, 2021 4:27 PM

To: OMF South <OMFsouth@soundtransit.org>; Susan Honda <Susan.Honda@cityoffederalway.com>; linda.kochmar@cityoffederslway.com <linda.kochmar@cityoffederslway.com>

Subject: O & M South

I am looking to have a representative speak to me about alternative sites and environmental impacts.

Please return a phone call to 206-304-1485.

Is Sound Transit SERIOUS about finding another OMF site other than the 2 in Federal Way?

What is the appeal process and fees for Sound Transit?

Will the link line be elevated as it travels south bound I-5 @ S. 336th St.?

When will the rezoning process begin? This is zoned as multifamily currently.

Is Sound Transit aware of the Concomitant Agreement that runs with the Christian Faith Center Property? Citizens have fought against thoughtless development, and upheld the CA. What enables Sound Transit to think they are above this document that runs into purtuity.?

The proposed 2 sites in FW lie within Major Streams. The Hylebos is listed as Class A waters under State water quality standards.

The western portion of the first site lies within a Resource Stream Protection Area. This area was significantly altered to accommodate the Church in 2007. Should we allow further destruction to these wetlands, and tributaries, when they have already sustained the maximum mitigations?

Is Sound Transit considering the cumulative impacts of not only an OMF, but the link line, as well as the development planned for the Weyerhaeuser Campus. Supreme Court ruled the City and IRG (owners of Campus) will utilize the Hylebos Watershed Plan and that all development be seen through cumulative eyes and the impacts to environment. The CFC property runs with a Concomitant Agreement. This document runs forever. How will Sound Transit go about opening up this agreement? The OMF is a part of that cumulative response. This area CAN NOT take any more pressure. I-5 and your link line will already cause significant problems, adding the 24/7 OMF site in this area will undoubtedly spell the end of the East Branch. How can ST justify this?

While this property lies just outside of the aquifer recharge area, the Milton Redondo resources are fed by groundwater runoff from Northlake (head waters) Weyerhaeuser Campus and Christian FC. there is a well head capture zone on what I believe is DOT property, (next to Ellenos Yogurt. Also this business is our largest employer in Federal Way. They have spent over 5 million dollars in upgrading their facility. We should not be forcing this business or any others out of their property.

Do we think it is a conflict of interest for Parametrix to do the survey work when they are the same company that did the work for the Christian Faith Center?

Two other sites were chosen in 2017 Fife and S. 352nd St. What happened to these sites? They are both landfills. If the Midway dump is being dangled to the citizens (and let's be honest here, Midway is NEVER going to happen.) Sound Transit needs 3 options and putting a non-viable site in front of the people when it is NOT an option is less than transparent. So, if we would entertain the Midway landfill in all the time and \$\$ it would take to create, why can't we clean up The Kits Corner Puyallup landfill or the Fife landfill and place your facility in either spot. King County should clean this up as it is toxic to the land and residents. Heck you could easily buy the LLOYDs landfill, not technically a landfill, but yes, it is) clean that up, and have great access for trains coming off of I-5. The property recently sold and 2 million sq. ft of warehouses will occupy the site. I think your impervious impact would be less. Another option.

In this climate when Sound Transit is deficient in funds, these spots would be far less expensive and costly to the environment. The Kits Corner/Puyallup landfill is very doable. Public records request show emails from Sound Transit individuals all saying that for 20 million they can make anything flat, the census is that ST can do whatever they choose. Don't tell the public theses are possibilities, and that ST is open to new sites if that is not the case. According to one of your representatives, I was told that there will be NO other options to entertain. Your website and zoom meeting, all said this is NOT a done deal, and you will look at any viable site. Knowing the history to this property is key. I know what has been done in the past, anymore development, especially of this size, would forever eliminate, the Hylebos East Branch. This simply stated, CAN NOT HAPPEN.

I know another option can be had. I am forwarding these emails to Federal Way Council persons so we are all aware of other possibilities for the South OMF site.

I would enjoy a knowledgeable representative to reach out some urgency. With the public

comment ending on the 19th, I know you will want to do your due diligence and provide the public with information requested.

Thank you for your time.

Suzanne
206-304-1485

Owner(s):

Contact ID	Name	Type	Phones	Email
783396	Suzanne Vargo	Individual	253-835-3499 (Home)	zanyban@hotmail.com

Communication ID: 473522 - OMF South DEIS Phone Comment

Communication (4/16/2021)

OMF South DEIS Phone Comment

"My name is Ben Gearford and my address is 3589 Boston Avenue Tacoma Washington 98418 and I think that you should choose the farthest South 344th Street location for an OMF South because it gets-us closest to Tacoma that's the most important it's got the least impact on wetlands and environment compared to the other two because I don't know if we wanna be digging up the dump and trucking it down the freeway for 6 1/2 years when we could be over and done with that and have a functioning OMF for a lot cheaper I don't know less urban place. I guess that's it. Thanks."

Owner(s):

Contact ID	Name	Type	Phones	Email
878586	Ben Gearheard	Individual		bgearheard@hotmail.com

Communication ID: 473534 - (1) OMF South DEIS comment

Communication (4/16/2021)

(1) OMF South DEIS comment

From: Barry Warner <barrywarner1@gmail.com>
Sent: Friday, April 16, 2021 12:53 PM
To: OMF South Scoping <OMFsouthscoping@soundtransit.org>
Subject: comment

For certain your staff has a difficult task in presenting an unbiased picture of the choices to the board. So what I say I say only to be certain that my view of the matter is clear.

1 In the executive summary it is said that GT (Garage Town Association) has 50 owners, which sounds to me like a large partnership, which it is not. GT's owners have title to individual units, and they pay the tax thereon. Yet, they are not counted as businesses or as residents in the EIC enumeration.

2 GT is a unique entity in Western Washington. The EIC acknowledges that resettling us will be difficult. I suspect that it will be nigh impossible..

3 The EIC also acknowledges that it will be difficult for Ellenos yogurt to survive relocation. While the pandemic continues to be a threat I would hope that Sound Transit would wish to minimize collateral damage.

4 Every jurisdiction needs its tax money. Of the three sites under review, only one pays significant taxes. Let it be.

5 Like every other public transportation system in the World, Sound Transit is suffering a lack of riders and revenue at this moment. What looks at first glance to be a weakness of the site in Kent: that it will take several more years to complete, may offer the chance to save money now..

Owner(s):

Contact ID	Name	Type	Phones	Email
884582	Barry Warner	Individual	253-254-4978	barrywarner1@gmail.com

Communication ID: 473620 - (1) Opposing Federal Way Operations and Maintenance Facility site

Communication (4/19/2021)

(1) Opposing Federal Way Operations and Maintenance Facility site

From: Bob Zimmerman <bobzim007@gmail.com>
Sent: Sunday, April 18, 2021 1:25 PM
To: OMF South <OMFsouth@soundtransit.org>
Subject: Opposing Federal Way Operations and Maintenance Facility site

I am writing to you in opposition to the Operations and Maintenance Facility (OMF) being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre- existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive. The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy Equipment Zoning would certainly not be compatible for the protected Hylebos Creek as it lies within a Resource Protection area within the 20th Ave. S. site.

Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Sincerely,

Bob Zimmerman

Owner(s):

Contact ID	Name	Type	Phones	Email
1026421	Bob Zimmerman	Individual		bobzim007@gmail.com

Communication ID: 473625 - (1) OMF South DEIS comments

Communication (4/18/2021)

(1) OMF South DEIS comments

April 18, 2021

To: Sound Transit Board:

Subject: OMF South Best Option

To consider already developed sites containing business, churches, residences, and natural habitat for the OMF site is a counterproductive use of King County land. Public input in prior rounds of comments overwhelmingly supported using the Midway landfill site as the Prime Spot for this OMF facility. We The People - Tax Payers - Voters have made it clear to those we elected that Midway is our choice for OMF location. At this point that should be loud and clear to Sound Transit.

Regarding Midway site:

- Public prefers using this site. Building at this location is done with consent of the electorate.
- Business (jobs), churches, residences and natural habitat are not impacted.
- Does not remove land availability from commercial/private use in an ever more densely populated South King County. Therefore, is a better long-term stewardship of our finite land.
- Places OMF immediately next to tracks already under construction. Supports fleet maintenance despite possible realignment and funding issues delaying expansion beyond Federal Way. Earlier start date possible.
- Creates more south end jobs by not displacing those currently situated on Alternative Federal Way locations.
- Cost delta between Midway and other projects is dwarfed compared to TDLE, Ballard, Everett, and Kirkland-Issaquah links costs.
- Given lower revenues and higher costs focus on completing projects where dirt is currently being moved. Midway has equipment on site and freeway access. Build OMF there. It will support south end operations until such time it is financially feasible to expand south of Federal Way station.

Regarding South 344thStreet site:

- Business (jobs), churches, residences, natural habitat are impacted.
- Ellenos Yogurt factory has approximately 150 employees, multi-millions of dollars in equipment and special licensing. Is the only industrial business in Federal Way.
- Garage Town a community of 67 individually owned units (same as owning a condominium unit). Has modern substantial buildings including a clubhouse. They are used as extensions of households and to support businesses. Hence involves not just owners, units involve families/relatives and business owners/employees. Draft EIS does not classify Garage Town owners as commercial owners or residential owners. Only facility of its kind in western Washington.
- Supports a broadcasting tower. Radio towers have certain land-configuration needs which must be addressed and special licensing.
- This site is a hill with businesses and residences on all sides. Is not near level like other two sites.
- Loss of existing family homes.
- Loss of tax revenue for City of Federal Way and King County.
- The City of Federal Way has conveyed to Sound Transit disapproval of any further acquisition of properties in their city. Loss of a portion of downtown retail acreage for rail station is plenty. Another municipality (Kent) would like to accommodate the OMF. Neither of the two Federal Way alternatives should be considered for use.
- Loss of approximately 250 jobs. EIS needs to be updated to reflect the true facts on job losses.

Regarding both Federal Way sites:

- Intersections supporting Interstate 5 access via South 320th and South 348th are very busy. Federal Way Police report that 348th & 16th Ave intersection is among busiest in the state. Increased traffic from construction will exacerbate this situation.
- Those with connections to these sites are wearied from two years of OMF anxiety/suspense. Announcing selection of Midway site sooner rather than another year out will better serve these citizen's plans and nerves.

In closing:

Listen to the people's choice Sound Transit, the best land choice for the OMF is the Midway Landfill area. Will be a lot of unhappy voters out there if you choose otherwise.

Bill Pugnetti

Auburn and Federal Way, WA

Documents: OMFS comments.docx

Owner(s):

Contact ID	Name	Type	Phones	Email
879312	Bill Pugnetti	Individual	253-941-5793	pugnetti@aol.com

Communication ID: 473639 - OMF South Draft EIS Flawed Data

Communication (4/17/2021)

OMF South Draft EIS Flawed Data

From: Peter Barbin <peterbarbin@me.com>

Sent: Saturday, April 17, 2021 11:01 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Draft EIS Flawed Data

Hello Sound Transit,

Of the 3 OMF South locations, only one will have a negative impact on residential homes, businesses, living wage jobs, and tax revenues.

I ask that the S. 344th St / Site 10A not be selected.

From the beginning of the scoping process, data has been flawed as recognized on the record by Dave Upthegrove, Claudia Balducci, Joe Mcdermott, Dow Constantine, Bruce Dammeier, Nancy Backus, and Peter Von Reichbauer.

Here are some errors found in the Draft EIS Document...there may be more:

The Draft EIS does not correctly count the number of property owners and businesses that would be impacted by building the OMF S on the South 344th St. / Site 10A.

The Garage Town facility at 2010 S 344th Street is a condominium consisting of 67 individually-owned tax parcels. The Draft EIS does not classify Garage Town owners as commercial owners or residential owners and these individuals are not included in the count of property owners or parcels (even though occupants of a 4 plex were so counted). See Table ES-1 on page ES-17 of the Executive Summary. The table only shows 20 Residential and 11 Business Displacements for the entire South 344th Street Site. Garage Town alone has 67 separate individual Condominium parcels and owners. Also see Table 3.5-5 in the Draft EIS.

This inaccurate count distorts the true number of individuals impacted in the data for the South 344th Street site contained in the Executive Summary. These inaccuracies must be corrected before the final EIS is completed so that the true scope of the impact on the Federal Way community is known before the "preferred alternative" is selected.

In addition, there is no indication in the Draft EIS that there is NO other facility like Garage Town in the Puget Sound area. Relocation of those property owners is not feasible because there is NO equivalent facility for them to move into. Multiple businesses, landlords, and private owners would be eliminated from the community as a result. This adverse impact on the community should be clearly stated in the final EIS so that this undesirable outcome can be properly taken into account as the final siting decision is made.

These are the same inaccuracies communicated to the board when Dave Upthegrove, Claudia Balducci, Joe Mcdermott, Dow Constantine, Bruce Dammeier, Nancy Backus, and Peter Von Reichbauer were present for public comment. This is very disappointing.

There is a role for government and it is to raise us to a better place without negatively impacting the lives and jobs in our community.

I ask that you not select the South 344th St. / 10A Site because the data you are receiving is flawed, and the impact to our homeowners, businesses, and working wage jobs would be significant.

Sincerely,

Peter Barbin
pbarbin@gmail.com
(206) 853-7154

Owner(s):

Contact ID	Name	Type	Phones	Email
884573	Peter Barbin	Individual	206-853-7154	pbarbin@gmail.com

Communication ID: 473640 - OMF South Location in South King County

Communication (4/19/2021)

OMF South Location in South King County

From: Karen Brugato <karenbrugato@gmail.com>

Sent: Sunday, April 18, 2021 11:39 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Cc: Federal Way City Council <COUNCIL@cityoffederalway.com>; Ferrell, Jim <Jim.Ferrell@cityoffederalway.com>

Subject: OMF Location in South King County.

Dear Mr. Hussein Rehmat;

Sound Transit is currently considering potential alternatives for the location of the new South Operations and Maintenance Facility (OMF). The focus seems to be narrowing on two locations in Federal Way. This, to me, appears a willful disregard to local area communities when a much more logical alternative exists: use of the Kent Midway Landfill site.

The Federal Way locations are detrimental to the local community with regard to housing and business displacement. The resulting disruption serves to negate much of the positive impact the OMF would have on providing more jobs to the area. Additionally, an OMF at the Federal Way sites would have a detrimental impact on Hylebos Creek. Building the OMF on the Midway Landfill site would eliminate displacement of residents and businesses further enhancing the OMF's benefits to local communities. Use of the landfill site returns a formerly polluted location to productive use instead of doing environmental harm to another area.

The Kent Midway Landfill Superfund Site has been deemed "Site Ready for Reuse and Redevelopment" since 2007. One of the goals of Superfund Cleanup is to return a site to productive use. What better use for this particular site? The eastern perimeter of the site is already being developed for the widening of I-5 and the Federal Way Link Light Rail Extension Project. To use the site to further support our region's transportation infrastructure by choosing it as the South OMF site is a logical next step.

Developing the Midway Landfill Superfund site will be more expensive in the short term, but the long term benefits brought about by added OMF jobs without disruption to local communities and their ecosystems is more than worth that cost. To not explore the federal grants with the present administration is short-sighted in the extreme.

Investing in the South OMF at the Kent Midway Landfill site now is not only the right thing to do, it is a social, economic and ecological imperative.

Owner(s):

Contact ID	Name	Type	Phones	Email
890550	Karen Brugato	Individual	+1 (253) 661-0286	karenbrugato@gmail.com

Communication ID: 473641 - OMF South Scoping

Communication (4/18/2021)

OMF South Scoping

From: cla427@juno.com <cla427@juno.com>

Sent: Sunday, April 18, 2021 12:15 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre- existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive. The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy Equipment Zoning would certainly not be compatible for the protected Hylebos Creek as it lies within a Resource Protection area within the 20th Ave. S. site.

Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macro-benthic invertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Think of the residents and businesses, and not yourselves.

Thank you for your time and thoughtful consideration.

Charae Ashcraft

Federal Way resident of 50years

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026438</u>	<u>Charae Ashcraft</u>	Individual		<u>cla427@juno.com</u>

Communication ID: 473642 - OMF South Draft Environmental Impact Statement Comments

Communication (4/18/2021)

OMF South Draft Environmental Impact Statement Comments

From: Malcolm Klug <malcolm.klug@gmail.com>

Sent: Sunday, April 18, 2021 2:13 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Draft Environmental Impact Statement comments

Hello,

I am an owner of one of the units in the Garagetown (GT) complex which is part of the South 344th Street site being evaluated for the OMF South facility. My comments concerning the DEIS document and Executive Summary follow:

- 1) The DEIS did not include the 58 owners at GT as residential or business property owners. All 58 owners should be included as property owners. All 58 owners will be displaced if the S 344th site is chosen.
- 2) Table 3.3-2 in the DEIS should be changed to include an accurate count of the tax parcels. The S 336th site contains 19 tax parcels. The S 344th site contains 109 tax parcels. Each GT unit is a separate tax parcel.
- 3) The Midway landfill site is not on any tax rolls and its use would not negatively impact tax revenue for any of the surrounding communities.
- 4) The DEIS states, on Page 3.6-9: "The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared with the other build alternatives." This statement of fact was not in the Executive Summary and should be included.
- 5) Using the Midway landfill site would displace the fewest number of businesses, churches and individuals. It also would have the lowest economic impact on the surrounding communities. If the S 336th site is chosen, 94 jobs will be lost. If the S 344th site is chosen, 248 jobs will be lost. These are the reasons I strongly urge and support the use of the Midway landfill site for OMF South.

Sincerely,

Malcolm L. Klug
1130 W Lake Sammamish Parkway NE
Bellevue, WA 98008

Owner(s):

Contact ID	Name	Type	Phones	Email
884527	Malcolm Klug	Individual		malcolm.klug@gmail.com

Communication (4/18/2021)

From: Trina Ballard Southern <trinasouthern@g

From: Trina Ballard Southern <trinasouthern@gmail.com>

Sent: Sunday, April 18, 2021 2:42 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

April 18, 2021

RE: OMF South Scoping

I am writing to you in opposition of an OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. South.

The current zoning at the Christian Faith Center (CFC) is multi-family. Zoning for the OMF at the 20th Ave. South site would require Heavy Industrial Equipment (HEI). Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection Area. The proposed site at 16th Ave. South is zoned as Business Park, also not HIE. Residential neighborhoods which pre-exist before the Business Park zoning in the area have persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over five million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit are extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit, find another location for your OMF.

Both of the mentioned sites have portions of the Hylebos Waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A Waters under State Water Quality Standards.

During the construction of the church in 2004, 35,936 sq.ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food, and water. The Resource Protection Area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed was taken 20 years ago. This land needs to remain as is.

The headwaters for the East Branch of the Hylebos are received via North Lake, less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrates must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990s is a roadmap for thoughtful development around the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mind-boggling in regard to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took four years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way will not allow your facility to be built here. The once-beautiful forest with its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quality in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one we support, although the cost and time may make this a nonviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping from Boeing and the Asarco. Site #1 is an environmental nightmare because this land was never created to serve or function as a landfill, nor was this dumping site closed properly. The petroleum pipeline that runs parallel with I-5 also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win-win for the environment, residents, and Sound Transit?

If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is Sound Transit who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last five years striving to protect and preserve the

former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th Street offers residents a way to reach our city establishments. The Supreme Court recently ruled that the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan, as well as view any developments through cumulative eyes in regard to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and we citizens should be heard and respected as our concerns are valid.

Sound Transit told citizens in print as well as at Zoom meetings that this was not a "done deal." One of your representatives (along with FW council members) has stated that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards. I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. I am confident a better solution for your facility can and will be found. It must not be within the city limits.

Thank you for your time and thoughtful consideration.

Sincerely,

Trina Ballard Southern

Note: Sent 2 emails to DEIS and Email the Board

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026441</u>	<u>Trina Ballard Southern</u>	Individual		<u>trinasouthern@gmail.com</u>

**Communication ID: 473644 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/19/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Dschinjr <dschinjr@aol.com>

Sent: Sunday, April 18, 2021 2:44 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South

April 19,2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
- 3)The Midway Landfill site has minimal business displacement.
- 4)The Midway Landfill site impacts zero residences.
- 5)The Midway Landfill site does not impact streams.
- 6)The Midway Landfill site does not impact wetlands.
- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff

to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,

David Schindler, Jr.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026442</u>	<u>David Schindler, Jr</u>	Individual		<u>schinjr@aol.com</u>

Communication (4/18/2021)

From: Mark Southern <marksouthern@gmail.com>

Sent: Sunday, April 18, 2021 2:49 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Cc: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

April 18, 2021

RE: OMF South Scoping

I am writing to you in opposition of an OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. South.

The current zoning at the Christian Faith Center (CFC) is multi-family. Zoning for the OMF at the 20th Ave. South site would require Heavy Industrial Equipment (HIE). Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection Area. The proposed site at 16th Ave. South is zoned as Business Park, also not HIE. Residential neighborhoods which pre-exist before the Business Park zoning in the area have persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over five million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit are extensive. The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit, find another location for your OMF.

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During the construction of the church in 2004, 35,936 sq.ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food, and water. The Resource Protection Area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed was taken 20 years ago. This land needs to remain as is.

The headwaters for the East Branch of the Hylebos are received via North Lake, less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macro-benthic invertebrates must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990s is a roadmap for thoughtful development around the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mind-boggling in regard to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took four years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way will not allow your facility to be built here. The once-beautiful forest with its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quality in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one we support, although the cost and time may make this a nonviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping from Boeing and the Asarco. Site #1 is an environmental nightmare because this land was never created to serve or function as a landfill, nor was this dumping site closed properly. The petroleum pipeline that runs parallel with I-5 also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win-win for the environment, residents, and Sound Transit?

If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is Sound Transit who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

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We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and we citizens should be heard and respected as our concerns are valid.

Sound Transit told citizens in print as well as at Zoom meetings that this was not a "done deal." One of your representatives (along with FW council members) has stated that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards. I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. I am confident a better solution for your facility can and will be found. It must not be within the city limits.

Thank you for your time and thoughtful consideration.

Sincerely,
Mark Southern

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026443</u>	<u>Mark Southern</u>	Individual		<u>markgsouthern@gmail.com</u>

**Communication ID: 473646 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Stella Schindler <stellasmusic@hotmail.com>

Sent: Sunday, April 18, 2021 3:27 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

April 18, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility.

However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

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Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

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"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
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- 4)The Midway Landfill site impacts zero residences.
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- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
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- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,

Stella M. Schindler

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026444</u>	<u>Stella Schindler</u>	Individual		<u>stellasmusic@hotmail.com</u>

Communication ID: 473647 - OMF South Scoping

Communication (4/19/2021)

OMF South Scoping

From: Stephanie Magat <stephaniegouldman@gmail.com>

Sent: Sunday, April 18, 2021 3:37 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

April 18, 2021

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre- existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

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Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to

work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Stephanie C Magat

Owner(s):

Contact ID	Name	Type	Phones	Email
1026445	Stephanie Magat	Individual		stephaniegouldman@gmail.com

**Communication ID: 473649 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Bryan Schindler <schindlerb@mhinc.com>

Sent: Sunday, April 18, 2021 3:59 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit

April 18, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
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When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
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I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff

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Sincerely,

Bryan Schindler | Analytics

Email schindlerb@mhin.com

MHIN is consolidating with IHIE through 2020.

846 N. Senate Ave, Ste. 300 | Indianapolis, IN | 46202

220 W. Colfax Ave, Ste. 300 | South Bend, IN | 46601

Owner(s):

Contact ID	Name	Type	Phones	Email
1026447	Bryan Schindler	Individual		schindlerb@mhin.com - schindler@rogo-bi.com

**Communication ID: 473651 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Bryan Schindler <schindler@rogo-bi.com>

Sent: Sunday, April 18, 2021 4:02 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit

April 18, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

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Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

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Sincerely,

Ella Schindler

schindler@rogo-bi.com

Owner(s):

Contact ID	Name	Type	Phones	Email
1026448	Ella Schindler	Individual		schindler@rogo-bi.com

**Communication ID: 473658 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/19/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Amber Schindler <amber@alumni.nd.edu>

Sent: Sunday, April 18, 2021 4:23 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

April 18, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility.

However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

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Sincerely,

Amber Schindler

Communication ID: 473660 - OMF South Scoping

Communication (4/18/2021)

OMF South Scoping

From: marianne lochner <arbor156@gmail.com>

Sent: Sunday, April 18, 2021 5:59 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF south scoping

To Sound Transit:

Email: OMFSouthDEIS@soundtransit.org

Or call 206-257-2135

April 18, 2021.

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

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The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive. The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

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During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

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Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

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I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Marianne Moore

Owner(s):

Contact ID	Name	Type	Phones	Email
879886	Marianne Moore	Individual		arbor156@gmail.com

**Communication ID: 473661 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Trish Peterson <trishpeterson@msn.com>

Sent: Sunday, April 18, 2021 6:10 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South

April 19, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336thStreet site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344thStreet alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344thStreet site would have the greatest impact to the local tax revenue. Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344thsite would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location forEllenos can be found if the S. 344thalternative is selected. However, as noted in the letter fromEllenos Yogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
- 3)The Midway Landfill site has minimal business displacement.
- 4)The Midway Landfill site impacts zero residences.
- 5)The Midway Landfill site does not impact streams.
- 6)The Midway Landfill site does not impact wetlands.
- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South344thStreet and South 336thStreet Alternatives, there is no question the344thsite should NOT be selected.

- 1)The344th Street site would have the most residential displacements
- 2)The344th Street site would displace five times as many businesses.
- 3)The344thStreet site would displace well over twice as many employees, and that does not include the proposed expansion atEllenos Yogurt in 2022.
- 4)The344thStreet site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff

to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344thSt. should be eliminated from consideration.

Sincerely,

Trish Peterson

Trish Peterson

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>884538</u>	<u>Patricia Peterson</u>	Individual		<u>trishpeterson@msn.com</u>

Communication ID: 473662 - Sound Transit Operations and Maintenance Facility South

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South

From: Mike Haigh <mikehaigh3@gmail.com>

Sent: Sunday, April 18, 2021 7:07 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Fwd: FW: Sound Transit Operations and Maintenance Facility South

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue. Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
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- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Thanks,
Mike Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>881728</u>	<u>Mike Haigh</u>	Individual		<u>mhaigh@wexfordcp.com</u>

Communication ID: 473663 - OMF South Scoping

Communication (4/18/2021)

OMF South Scoping

From: David Jorgensen <jorgensen_david@hotmail.com>

Sent: Sunday, April 18, 2021 7:08 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

Sound Transit,

I am writing to you in opposition of an OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. South.

The current zoning at the Christian Faith Center (CFC) is multi-family. Zoning for the OMF at the 20th Ave. South site would require Heavy Industrial Equipment (HEI). Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection Area. The proposed site at 16th Ave. South is zoned as Business Park, also not HIE. Residential neighborhoods which pre-exist before the Business Park zoning in the area have persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over five million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit are extensive. The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

Both of the mentioned sites have portions of the Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A Waters under State Water Quality Standards.

During the construction of the church in 2004, 35,936 sq.ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food, and water. The Resource Protection Area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed was taken 20 years ago. This land needs to remain as is.

The headwaters for the East Branch of the Hylebos are received via North Lake, less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrates must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990s is a roadmap for thoughtful development around the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mind-boggling in regard to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took four years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way will not allow your facility to be built here. The once-beautiful forest with its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quality in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one we support, although the cost and time may make this a nonviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping from Boeing and the Asarco. Site #1 is an environmental nightmare because this land was never created to serve or function as a landfill, nor was this dumping site closed properly. The petroleum pipeline that runs parallel with I-5 also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win-win for the environment, residents, and Sound Transit?

If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is Sound Transit who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last five years striving to protect and preserve the

former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th Street offers residents a way to reach our city establishments. The Supreme Court recently ruled that the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan, as well as view any developments through cumulative eyes in regard to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and we citizens should be heard and respected as our concerns are valid.

Sound Transit told citizens in print as well as at Zoom meetings that this was not a "done deal." One of your representatives (along with FW council members) has stated that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards. I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. I am confident a better solution for your facility can and will be found. It must not be within the city limits.

Thank you for your time and thoughtful consideration.

Sincerely,

David Jorgensen, Federal Way Resident

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026459</u>	<u>David Jorgenson</u>	Individual		<u>jorgenson_david@hotmail.com</u>

Communication ID: 473664 - OMF South Scoping

Communication (4/18/2021)

OMF South Scoping

From: Rachel R-U <routtutrer.r@gmail.com>

Sent: Sunday, April 18, 2021 7:22 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Cc: Ferrell, Jim <Jim.Ferrell@cityoffederalway.com>

Subject: OMF South Scoping

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre- existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy Equipment Zoning would certainly not be compatible for the protected Hylebos Creek as it lies within a Resource Protection area within the 20th Ave. S. site.

Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the

Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Rachel Routt-Utrera, RN

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026461</u>	<u>Rachel Routt-Utrera</u>	Individual		<u>routtutrera.r@gmail.com</u>

**Communication ID: 473665 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Megan Haigh <mlhaigh21@gmail.com>

Sent: Sunday, April 18, 2021 7:35 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South

April 18, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
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- 4)The Midway Landfill site impacts zero residences.
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- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff

to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,

Megan Gamache

Owner(s):

Contact ID	Name	Type	Phones	Email
881812	<u>Megan Gamache</u>	Individual		<u>mlhaigh21@gmail.com</u>

Communication ID: 473666 - OMF South Scoping

Communication (4/18/2021)

OMF South Scoping

From: Anne Sallaska <alsallaska@gmail.com>

Sent: Sunday, April 18, 2021 7:59 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: RE: OMF South Scoping

I am writing to you in opposition of an OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. South.

The current zoning at the Christian Faith Center (CFC) is multi-family. Zoning for the OMF at the 20th Ave. South site would require Heavy Industrial Equipment (HIE). Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection Area. The proposed site at 16th Ave. South is zoned as Business Park, also not HIE. Residential neighborhoods which pre-exist before the Business Park zoning in the area have persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over five million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit are extensive. The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

Both of the mentioned sites have portions of the Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A Waters under State Water Quality Standards.

During the construction of the church in 2004, 35,936 sq.ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food, and water. The Resource Protection Area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed was taken 20 years ago. This land needs to remain as is.

The headwaters for the East Branch of the Hylebos are received via North Lake, less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrates must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990s is a roadmap for thoughtful development around the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mind-boggling in regard to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took four years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way will not allow your facility to be built here. The once-beautiful forest with its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quality in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one we support, although the cost and time may make this a nonviable option. In that instance, could you please revisit your #1 ([S. 352nd St.](#)) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping from Boeing and the Asarco. Site #1 is an environmental nightmare because this land was never created to serve or function as a landfill, nor was this dumping site closed properly. The petroleum pipeline that runs parallel with I-5 also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win-win for the environment, residents, and Sound Transit?

If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is Sound Transit who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

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and 320th St. at maximum failure today, the S. 336th Street offers residents a way to reach our city establishments. The Supreme Court recently ruled that the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan, as well as view any developments through cumulative eyes in regard to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and we citizens should be heard and respected as our concerns are valid.

Sound Transit told citizens in print as well as at Zoom meetings that this was not a "done deal."

One of your representatives (along with FW council members) has stated that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations.

Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. I am confident a better solution for your facility can and will be found. It must not be within the city limits.

Thank you for your time and thoughtful consideration.

Anne Sallaska

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026462</u>	<u>Anne Sallaska</u>	Individual		<u>alsallaska@gmail.com</u>

Communication ID: 473668 - OMF South Scoping

Communication (4/18/2021)

OMF South Scoping

From: Avery Clark <averyclarknyc@gmail.com>

Sent: Sunday, April 18, 2021 8:05 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Re: OMF south scoping

I am writing to you in opposition of an OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. South.

The current zoning at the Christian Faith Center (CFC) is multi-family. Zoning for the OMF at the 20th Ave. South site would require Heavy Industrial Equipment (HIE). Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection Area. The proposed site at 16th Ave. South is zoned as Business Park, also not HIE. Residential neighborhoods which pre-exist before the Business Park zoning in the area have persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over five million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit are extensive. The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

Both of the mentioned sites have portions of the Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A Waters under State Water Quality Standards.

During the construction of the church in 2004, 35,936 sq.ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food, and water. The Resource Protection Area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed was taken 20 years ago. This land needs to remain as is.

The headwaters for the East Branch of the Hylebos are received via North Lake, less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrates must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990s is a roadmap for thoughtful development around the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mind-boggling in regard to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took four years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way will not allow your facility to be built here. The once-beautiful forest with its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quality in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one we support, although the cost and time may make this a nonviable option. In that instance, could you please revisit your #1 ([S. 352nd St.](#)) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping from Boeing and the Asarco. Site #1 is an environmental nightmare because this land was never created to serve or function as a landfill, nor was this dumping site closed properly. The petroleum pipeline that runs parallel with I-5 also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win-win for the environment, residents, and Sound Transit?

If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is Sound Transit who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last five years striving to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18

and 320th St. at maximum failure today, the S. 336th Street offers residents a way to reach our city establishments. The Supreme Court recently ruled that the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan, as well as view any developments through cumulative eyes in regard to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and we citizens should be heard and respected as our concerns are valid.

Sound Transit told citizens in print as well as at Zoom meetings that this was not a "done deal."

One of your representatives (along with FW council members) has stated that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations.

Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. I am confident a better solution for your facility can and will be found. It must not be within the city limits.

Thank you for your time and thoughtful consideration.

Daniel

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026463</u>	<u>Daniel</u>	Individual		<u>averyclarknyc@gmail.com</u>

Communication ID: 473669 - Sound Transit Operations and Maintenance Facility South - Environmental Impact Statement Comments

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South - Environmental Impact Statement Comments

From: Molly Haigh <mhaigh24@gmail.com>

Sent: Sunday, April 18, 2021 8:34 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South - Environmental Impact Statement Comments

April 18, 2021

OMF South, c/o Hussein Rehmat
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue. Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
- 3)The Midway Landfill site has minimal business displacement.
- 4)The Midway Landfill site impacts zero residences.
- 5)The Midway Landfill site does not impact streams.
- 6)The Midway Landfill site does not impact wetlands.
- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a

jurisdiction that is already paying into the Sound Transit taxing district.
I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,
Mary Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026464</u>	<u>Mary Haigh</u>	Individual		<u>mhaigh24@gmail.com</u>

**Communication ID: 473670 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Molly Haigh <molly@helloworldsociety.com>

Sent: Sunday, April 18, 2021 8:36 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South - Environmental Impact Statement Comments

April 18, 2021

OMF South, c/o Hussein Rehmat
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue. Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

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The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

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- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

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jurisdiction that is already paying into the Sound Transit taxing district.
 I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,
 Molly Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
884586	Molly Haigh	Individual		mhaigh24@gmail.com - molly@hellobitesociety.com

Communication ID: 473671 - Sound Transit Operations and Maintenance Facility South

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South

From: James Haigh <jhaigh@southbank.legal>

Sent: Sunday, April 18, 2021 9:12 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South

Mr. Rehmat:

I understand that letters expressing opinions regarding the Sound Transit Operations and Maintenance Facility - South should be directed to you.
 Having taken a look at DEIS comments on the topic, I hope that the Sound Transit Board chooses the Midway Landfill site for the new facility. It would be a great use of public resources to put to good public use a landfill site that is mostly vacant property. This use of property would be the best from an environmental perspective, since it puts to productive use, and cleans up, a historical environmental problem. The DEIS comments note that no wetlands or water sources would be adversely effected. Also, this site is best for people: it would preserve the most jobs, businesses, and residences.
 The worst possible location is the South 344thStreet site. I urge you not to select that site. Doing so would negatively affect the greatest number of businesses (and therefore employees), and residences (and therefore families) of Federal Way. It would also have the greatest negative effect on the tax base of Federal Way, resulting in increased costs for other residents of Federal Way. I hope Sound Transit takes seriously its responsibility to be a good neighbor and to limit as much as possible the harm cause to people and the environment by the selection of the new OMF site. I'm confident that if Sound Transit does focus on that responsibility, it will select the mostly-empty Landfill site and avoid the South 344thStreet site.
 Thank you,
 James Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
1026465	James Haigh	Individual		jhaigh@southbank.legal

**Communication ID: 473677 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Joe Haigh <joe3300@yahoo.com>

Sent: Sunday, April 18, 2021 10:00 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

April 19, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility.

If the Midway Landfill site is not chosen, the South 336thStreet site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344thStreet alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

The South 344thStreet site would also have the greatest impact to the local tax revenue. Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

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"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

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I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344thSt. should be eliminated from consideration.

Sincerely,
Joe Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026470</u>	<u>Joe Haigh</u>	Individual		<u>joe3300@yahoo.com</u>

Communication ID: 473679 - OMF South DEIS Comments

Communication (4/18/2021)

OMF South DEIS Comments

From: Debbie Caddell <laserladydeb@gmail.com>

Sent: Sunday, April 18, 2021 10:03 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF

RE: OMF South Scoping

I am writing to you in opposition of an OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. South.

The current zoning at the Christian Faith Center (CFC) is multi-family. Zoning for the OMF at the 20th Ave. South site would require Heavy Industrial Equipment (HEI). Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection Area. The proposed site at 16th Ave. South is zoned as Business Park, also not HIE. Residential neighborhoods which pre-exist before the Business Park zoning in the area have persisted as a single-family residential area for more than two decades.

Sound Transit please find another location for your OMF.

Both of the mentioned sites have portions of the Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A Waters under State Water Quality Standards.

The headwaters for the East Branch of the Hylebos are received via North Lake, less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrates must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990s is a roadmap for thoughtful development around the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mind-boggling in regard to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took four years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way will not allow your facility to be built here. The once-beautiful forest with its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quality in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one we support, although the cost and time may make this a nonviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is Sound Transit who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

The citizens of Federal Way have spent the last five years striving to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th Street offers residents a way to reach our city establishments. The Supreme Court recently ruled that the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan, as well as view any developments through cumulative eyes in regard to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already beingaccommodatingfor the link line and transfer stations being built along 320th. How much morewill FederalWay have to endure?

Sound Transit told citizens in print as well as at Zoom meetings that this was not a "done deal."

One of your representatives (along with FW council members) has stated that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards. I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. I am confident a better solution for your facility can and will be found. It must not be within the city limits.

Thank you for your time and thoughtful consideration.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026473</u>	<u>Debbie Caddell</u>	Individual		<u>laserladydeb@gmail.com</u>

Communication ID: 473681 - OMF South Scoping

Communication (4/18/2021)

OMF South Scoping

From: Martin Loft <martinbloft@gmail.com>

Sent: Sunday, April 18, 2021 10:03 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

To Sound Transit:

April 18, 2021

RE: OMF South Scoping

I am writing to you in opposition of an OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. South.

The current zoning at the Christian Faith Center (CFC) is multi-family. Zoning for the OMF at the 20th Ave. South site would require Heavy Industrial Equipment (HEI). Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection Area. The proposed site at 16th Ave. South is zoned as Business Park, also not HIE. Residential neighborhoods which pre-exist before the Business Park zoning in the area have persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over five million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit are extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

Both of the mentioned sites have portions of the Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A Waters under State Water Quality Standards.

During the construction of the church in 2004, 35,936 sq.ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food, and water. The Resource Protection Area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed was taken 20 years ago. This land needs to remain as is.

The headwaters for the East Branch of the Hylebos are received via North Lake, less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macrobenthic invertebrates must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990s is a roadmap for thoughtful development around the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mind-boggling in regard to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took four years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way will not allow your facility to be built here. The once-beautiful forest with its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quality in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one we support, although the cost and time may make this a nonviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping from Boeing and the Asarco. Site #1 is an environmental nightmare because this land was never created to serve or function as a landfill, nor was this dumping site closed properly. The petroleum pipeline that runs parallel with I-5 also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win-win for the environment, residents, and Sound Transit?

If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is Sound Transit who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last five years striving to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th Street offers residents a way to reach our city establishments. The Supreme Court recently ruled that the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan, as well as view any developments through cumulative eyes in regard to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and we citizens should be heard and respected as our concerns are valid.

Sound Transit told citizens in print as well as at Zoom meetings that this was not a "done deal." One of your representatives (along with FW council members) has stated that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards. I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. I am confident a better solution for your facility can and will be found. It must not be within the city limits.

Thank you for your time and thoughtful consideration.

I am in support of the preceding letter.

Martin Loft
2210 Thea Ct
Milton, WA. 98354

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026474</u>	<u>Martin Loft</u>	Individual		<u>martinbloft@gmail.com</u>

**Communication ID: 473682 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/18/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Philip Gamache <gamache.philip@gmail.com>

Sent: Sunday, April 18, 2021 10:46 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: RE: Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

April 18, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility.

However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
- 3)The Midway Landfill site has minimal business displacement.
- 4)The Midway Landfill site impacts zero residences.
- 5)The Midway Landfill site does not impact streams.
- 6)The Midway Landfill site does not impact wetlands.
- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St, should be eliminated from consideration.

Sincerely,

Phil Gamache

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026475</u>	<u>Phil Gamache</u>	Individual		<u>gamache.philip@gmail.com</u>

Communication ID: 473684 - OMF South Scoping

Communication (4/19/2021)

OMF South Scoping

To Sound Transit

April 18, 2021.

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre- existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy Equipment Zoning would certainly not be compatible for the protected Hylebos Creek as it lies within a Resource Protection area within the 20th Ave. S. site.

Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macro-benthic invertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to

finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed. Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city

establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound

Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Lifetime resident of Federal Way

Suzanne Vargo

Documents: OMF sound transit letter 4 19 2021 (1).docx

Owner(s):

Contact ID	Name	Type	Phones	Email
783396	Suzanne Vargo	Individual	253-835-3499 (Home)	zanyban@hotmail.com

Communication ID: 473685 - Sound Transit Maintenance Facility South

Communication (4/19/2021)

Sound Transit Maintenance Facility South

From: gia haigh <giaandjamey@gmail.com>

Sent: Monday, April 19, 2021 5:48 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Maintenance Facility South

Dear Mr. Rehmat:

I write in support of the Sound Transit Board selecting the Midway Landfill site for its new maintenance facility. That site would be a great use of vacant property, would not harm the environment other than a small number of trees, would not cause anyone to lose their homes, would not cause anyone to lose their jobs, and would not cause Federal Way and other governments to lose needed tax revenue.

The second best option is the South 336th Street site because an old church facility can more easily be replaced than other facilities and Federal Way tax revenue, jobs and residences would not be adversely effected.

The worst option is the South 344th Street site, which would displace the greatest number of jobs, businesses, and residences, thereby significantly adversely affecting the tax base and people of Federal Way.

I hope the Sound Transit Board makes the right decision for people and for the environment and selects the Midway Landfill site, and avoids the South 344th St. site that would be by far the worst outcome for the businesses, employees, and residents of Federal Way.

Regards,
Gia Haigh

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026476</u>	<u>Gia Haigh</u>	Individual		<u>giaandjamey@gmail.com</u>

**Communication ID: 473715 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/19/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Jeanne Schindler <jschindler06@gmail.com>

Sent: Monday, April 19, 2021 6:15 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: RE: Sound Transit Operations and Maintenance Facility South

April 19, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
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- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff

to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,

Jeanne Schindler, PhD

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026531</u>	<u>Jeanne Schindler</u>	Individual		<u>jschindler06@gmail.com</u>

Communication ID: 473716 - OMF South Scoping Letter

Communication (4/19/2021)

OMF South Scoping Letter

To Sound Transit

April 18, 2021.

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods **pre-existing** the Business Park zoning in the area and has persisted as a single-family residential area for more than **two decades**.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy Equipment Zoning would certainly not be compatible for the protected Hylebos Creek as it lies within a Resource Protection area within the 20th Ave. S. site.

Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, **35,936 sq. ft. of wetlands** were displaced/filled in order to create the largest church campus in the state. This area is a part of the **International Flight Pathway**. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

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Sound Transit please find another location for your OMF.

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Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city

establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

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I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Lifetime resident of Federal Way
Suzanne Vargo

Documents: OMF sound transit letter 4 19 2021 (2).docx

Owner(s):

Contact ID	Name	Type	Phones	Email
1026532	Dave Lesinski	Individual		jeepdave03@yahoo.com

Communication ID: 473718 - OMF Sound Transit Letter

Communication (4/19/2021)

OMF Sound Transit Letter

To Sound Transit

April 18, 2021.

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

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Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, **35,936 sq. ft. of wetlands** were displaced/filled in order to create the largest church campus in the state. This area is a part of the **International Flight Pathway**. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed. Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city

establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision **HAS** been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Lifetime resident of Federal Way
Suzanne Vargo

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026534</u>	<u>Kerry Lesinski</u>	Individual		<u>shamrockkerry1@yahoo.com</u>

Communication ID: 473721 - OMF South Draft EIS Email Comment

Communication (4/19/2021)

OMF South Draft EIS Email Comment

From: Kristen Y <kyost77@gmail.com>

Sent: Monday, April 19, 2021 7:43 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area. The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre- existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive. The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

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Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

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Both of these options are landfills that received toxic dumping from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a landfill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

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I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Warmly,

Kristen Yost
Federal Way Resident

Owner(s):

Contact ID	Name	Type	Phones	Email
1026536	Kristen Yost	Individual		kyost77@gmail.com

Communication ID: 473722 - Sound Transit to stop the OMF in Federal Way.

Communication (4/19/2021)

Sound Transit to stop the OMF in Federal Way

From: Loraine Rogers <lorainelrogersasid@gmail.com>

Sent: Monday, April 19, 2021 9:20 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit to stop the OMF in Federal Way

To Sound Transit:

Email: OMFSouthDEIS@soundtransit.org

Or call 206-257-2135

April 18, 2021.

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

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Sound Transit please find another location for your OMF.

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Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is

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Thank you for your time and thoughtful consideration.

Lorraine L Rogers

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026539</u>	<u>Lorraine Rogers</u>	Individual		<u>lorainelrogersasid@gmail.com</u>

Communication ID: 473724 - OMF South Draft EIS Comment

Communication (4/19/2021)

OMF South Draft EIS Comment

From: Karen Langridge <dbltrbl6363@hotmail.com>

Sent: Monday, April 19, 2021 9:40 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

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I am confident a better solution for your facility can and will be found. It will not be within the Federal Way city limits.

Thank you for your time and thoughtful consideration.

Sent from my Samsung Galaxy smartphone

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>878587</u>	<u>Karen Langridge</u>	Individual		<u>dbltrbl6363@hotmail.com</u>

Communication ID: 473725 - OMF South Draft EIS Email Comment

Communication (4/19/2021)

OMF South Draft EIS Email Comment

From: mrmaint@gmail.com <mrmaint@gmail.com>

Sent: Monday, April 19, 2021 9:50 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: comment

I watched you omfsouth presentation on the internet and had a few comments.

1. Why are you parking so many trains. They should be on the tracks moving people or being serviced. 24 hour service for all areas will encourage the best use of the vehicles and will allow businesses to best use their facilities by having round the clock use of their capital expenditures as well. Daytime only train service leaves people stranded, limits a significant section of the population from using the transit system and necessitates the huge expenditure of storing trains while not running. Calculate the size of service facilities needed to keep the trains all running, spend the money there and provide 24/7 service at a lower cost.
2. If you provided 24/7 service, the daytime load would lessen and you would not need to have as many trains running.
3. Building on the landfill is expensive because of two factors: foundation support and hazardous soil removal. You can eliminate both of those costs by building the parking and support facilities under the rail lines on the floor of the landfill and have the facilities be underground where they will be more energy efficient and then the soil does not need to leave the site. Proper ventilation needs to be in the buildings anyways and then the surface could also have a solar power plant that returns value and resources to the community around the train yard without the noise and ugliness of a train yard being seen. Sincerely,
Alex Bruski

Owner(s):

Contact ID	Name	Type	Phones	Email
1026543	Alex Bruski	Individual		mrmaint@gmail.com

**Communication ID: 473726 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/19/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

April 19,2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
- 3)The Midway Landfill site has minimal business displacement.
- 4)The Midway Landfill site impacts zero residences.
- 5)The Midway Landfill site does not impact streams.
- 6)The Midway Landfill site does not impact wetlands.
- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,

David L. Schindler

Documents: building .docx

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026544</u>	<u>David Schindler</u>	Individual		<u>dlschindle@gmail.com</u>

**Communication ID: 473727 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/19/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: John Haigh <jhaigh@benedictine.edu>

Sent: Monday, April 19, 2021 10:24 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South--Environmental Impact Statement Comments

April 19, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

Upon review of the Draft EIS documents for the Operations and Maintenance Facility-South, I strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility— with the next preferred alternate site being that at South 336thStreet. Here's why:

Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344thStreet alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344thStreet site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative.

Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344thsite would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344thalternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021, the devil is in the details and Ellenos might not in fact survive a move given the living nature of its product:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1) The Midway Landfill site is mostly vacant property.
- 2) The Midway Landfill site has the fewest displacements of employees.
- 3) The Midway Landfill site has minimal business displacement.
- 4) The Midway Landfill site impacts zero residences.
- 5) The Midway Landfill site does not impact streams.
- 6) The Midway Landfill site does not impact wetlands.
- 7) The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8) And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344thStreet and South 336thStreet Alternatives, there is no question the 344thsite should NOT be selected.

- A) The 344th Street site would have the most residential displacements
- B) The 344th Street site would displace five times as many businesses.
- C) The 344thStreet site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- D) The 344thStreet site would have a significantly larger impact on the local tax revenue in a

jurisdiction that is already paying into the Sound Transit taxing district.
I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. I strongly urge the STB to eliminate the South 344thSt. site from consideration.

Sincerely,

John P. Haigh, AIA | NCARB

Assistant Professor of Architecture

Bishop Fink Hall 414 | Benedictine College

1020 North 2nd Street | Atchison, Kansas 66002 | www.benedictine.edu

jhaigh@benedictine.edu | 913.360.7972

Owner(s):

Contact ID	Name	Type	Phones	Email
1026545	John Haigh	Individual		jhaigh@benedictine.edu

**Communication ID: 473730 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/19/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: JP Haigh <3haigh@protonmail.com>

Sent: Monday, April 19, 2021 10:28 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South_Environmental Impact Statement Comments

April 19, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

Upon review of the Draft EIS documents for the Operations and Maintenance Facility-South, I strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility—with the next preferred alternate site being that at South 336thStreet. Here's why:

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"The South 344thStreet alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344thStreet site would have the greatest impact to the local tax revenue. Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

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- D) The 344thStreet site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. In the interest of the community and environment please eliminate the South 344thSt. site from consideration.

Sincerely,

Maggie Haigh

Sent withProtonMailSecure Email.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026549</u>	<u>Maggie Haigh</u>	Individual		<u>3haigh@protonmail.com</u>

Communication ID: 473734 - OMF South Draft EIS Email Comment

Communication (4/19/2021)

OMF South Draft EIS Email Comment

From: Dave Lesinski <jeeperdave03@yahoo.com>

Sent: Monday, April 19, 2021 10:32 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

?

To Sound Transit

April 18, 2021.

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre-existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy Equipment Zoning would certainly not be compatible for the protected Hylebos Creek as it lies within a Resource Protection area within the 20th Ave. S. site.

Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is apart of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S.

352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Lifetime resident of Federal Way

Suzanne Vargo

Dave Lesinski

jeepdave03@yahoo.com

Owner(s):

Contact ID	Name	Type	Phones	Email
1026532	Dave Lesinski	Individual		jeepdave03@yahoo.com

Communication ID: 473735 - OMF South Draft EIS Email Comment

Communication (4/19/2021)

OMF South Draft EIS Email Comment

From: Tina Sumner <tinas5801@yahoo.com>

Sent: Monday, April 19, 2021 10:46 AM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF

EMERGENCY RESPONSE NEEDED:

To Sound Transit:
Email: OMFSouthDEIS@soundtransit.org
Or call 206-257-2135

April 18, 2021.

RE: OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

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The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre- existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

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The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

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Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

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Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line

now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed.

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Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major disruption to our city.

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I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026553</u>	<u>Tina Sumner</u>	Individual		<u>tinas5901@yahoo.com</u>

Communication (4/19/2021)

OMF Plea

From: KAREN SMITH <lkikm@comcast.net>

Sent: Monday, April 19, 2021 12:58 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF Plea

To Sound Transit:

April 18, 2021

RE: OMF South Scoping

I am writing to you in opposition of an OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. South.

The current zoning at the Christian Faith Center (CFC) is multi-family. Zoning for the OMF at the 20th Ave. South site would require Heavy Industrial Equipment (HEI). Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection Area. The proposed site at 16th Ave. South is zoned as Business Park, also not HIE. Residential neighborhoods which pre-exist before the Business Park zoning in the area have persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over five million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

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The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

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During the construction of the church in 2004, 35,936 sq.ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food, and water. The Resource Protection Area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed was taken 20 years ago. This land needs to remain as is.

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Couldn't this be a win-win for the environment, residents, and Sound Transit?

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Thank you for your time and thoughtful consideration.

Sincerely,
Karen Smith

Owner(s):

Contact ID	Name	Type	Phones	Email
1026554	Karen Smith	Individual		lkikm@comcast.net

**Communication ID: 473811 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/19/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Lynne Pearson <runmomof4@gmail.com>

Sent: Monday, April 19, 2021 3:53 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations

April 19, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
- 3)The Midway Landfill site has minimal business displacement.
- 4)The Midway Landfill site impacts zero residences.
- 5)The Midway Landfill site does not impact streams.
- 6)The Midway Landfill site does not impact wetlands.
- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff

to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,
Lynne Pearson

Owner(s):

Contact ID	Name	Type	Phones	Email
884539	Lynne Pearson	Individual		runmomof4@gmail.com

**Communication ID: 473812 - Sound Transit Operations and Maintenance Facility South
Environmental Impact Statement Comments**

Communication (4/19/2021)

Sound Transit Operations and Maintenance Facility South Environmental Impact Statement Comments

From: Adrian Pearson <apearson33@gmail.com>

Sent: Monday, April 19, 2021 3:54 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Sound Transit Operations and Maintenance Facility South

April 19, 2021

OMF South, c/o Hussein Rehmat

Sound Transit

401 S. Jackson Street

Seattle, WA 98104

RE: Sound Transit Operations and Maintenance Facility South

Environmental Impact Statement Comments

Mr. Rehmat:

I have reviewed the Draft EIS documents for the Operations and Maintenance Facility - South and strongly encourage the Sound Transit Board to select the Midway Landfill site for the new facility. However, if the Midway Landfill site is not chosen, the South 336th Street site is the next best option. Section 3.6.2.2 of the DEIS on page 3.6-9 states:

"The South 344th Street alternative would impact the most social resources and would have the greatest number of business and residential displacements as compared to the build alternatives."

Additionally, the South 344th Street site would have the greatest impact to the local tax revenue.

Property owners are already paying taxes to Sound Transit and any loss of revenue further impacts the residents in the City of Federal Way.

The DEIS makes many assumptions. The DEIS should include a table of assumptions for each of the sites and all alternatives made by Sound Transit staff and consultants. This would help the public and the Sound Transit Board understand how the alternatives were analyzed in the draft DEIS and identify potential cost savings vs. the significantly large estimates in the DEIS. For example, the DEIS assumes waste removal from the Midway Landfill could only occur from May through September creating an extremely long construction duration leading to increased costs. Identify all assumptions for each alternative

The DEIS also estimated employee displacements based on assumptions for each alternative. Employee displacement numbers shown in the DEIS are based on square footage of floor space, not actual numbers. In fact, the S. 344th site would displace Ellenos Yogurt, and not only their current employees, but additional jobs that are anticipated when Ellenos expands to a 24-hour operation by the end of 2022. This should be included in the analysis. The assumptions in the DEIS do not take this into consideration. The DEIS states a suitable location for Ellenos can be found if the S. 344th alternative is selected. However, as noted in the letter from EllenosYogurt dated March 26, 2021:

"Equally important, it would take a minimum of a year to ensure a new facility will efficiently and effectively produce product that meet safety and quality parameters essential to remaining competitive and financially stable. The myriad of steps required represent a 2+ year process when an organization has the excess staffing to operate two facilities and assumes the project does not encounter unexpected setbacks, which pragmatically speaking, is not likely to be the case."

The Sound Transit Board has an opportunity to select a site that makes the most sense for the region. The Midway Landfill site offers the following benefits:

- 1)The Midway Landfill site is mostly vacant property.
- 2)The Midway Landfill site has the fewest displacements of employees.
- 3)The Midway Landfill site has minimal business displacement.
- 4)The Midway Landfill site impacts zero residences.
- 5)The Midway Landfill site does not impact streams.
- 6)The Midway Landfill site does not impact wetlands.
- 7)The Midway Landfill site has the lowest impact on forest resources. The forest impacts identified on the Midway Landfill site should not be considered forest.
- 8)And very significantly, the Midway Landfill has the least impacts on local tax revenue to the local community.

When comparing the South 344th Street and South 336th Street Alternatives, there is no question the 344th site should NOT be selected.

- 1)The 344th Street site would have the most residential displacements
- 2)The 344th Street site would displace five times as many businesses.
- 3)The 344th Street site would displace well over twice as many employees, and that does not include the proposed expansion at Ellenos Yogurt in 2022.
- 4)The 344th Street site would have a significantly larger impact on the local tax revenue in a jurisdiction that is already paying into the Sound Transit taxing district.

I encourage the Sound Transit Board to be bold and make the right decision. Challenge your staff

to eliminate the assumptions in the Draft EIS, to identify the real cost of the OMF-S on the Midway Landfill site. Local and regional plans are required to look at long term benefits and impacts in the planning process. The OMF-S is a facility that will likely be functional for over a century and will have long term impacts. Certainly, the least impactful location to any community is Midway Landfill and that is best for the region. Of the two sites located within the City of Federal Way, the South 344th St. should be eliminated from consideration.

Sincerely,

Adrian Pearson

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1026607</u>	<u>Adrian Pearson</u>	Individual		<u>apearson33@gmail.com</u>

Communication ID: 473814 - OMF South DEIS Email Comment

Communication (4/19/2021)

OMF South DEIS Email Comment

From: milana m <milana111@hotmail.com>

Sent: Monday, April 19, 2021 4:15 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Re: OMF South Scoping

I am writing to you in opposition of the south sound OMF being built along/at 20th Ave S. or 16th Ave S. in Federal Way. Out of the three options available both of these options would create significant environmental, residential, business related impacts for our community. The current zoning at the Christain Faith Center is multi family. Zoning for the OMF would be Heavy Industrial Equipment. Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area. Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards. Residential neighborhoods pre-existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades. This also does not account for the residential areas near the proposed locations that would experience elevated levels of environmental pollution.

Ellenos Yogurt is the large employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support. d

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way. Sound Transit please find another location for your OMF.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Macroinvertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. While the costs and time frame for construction are both higher than the Federal Way options, we (the smaller and greater community) are the reason the landfill is a landfill. Why not take the opportunity to invest in our environment and in our communities and give the landfill land a new purpose instead of passing the buck and significantly impacting yet another community. Or could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Ararco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed.

Couldn't this be a win win for the environment, residents and Sound transit?

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members have shared bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards. I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Milana Michalek

Owner(s):

Contact ID	Name	Type	Phones	Email
1026609	Milana Michalek	Individual		milana111@hotmail.com

Communication ID: 473818 - Errors and Omissions in the OMF South Draft Environmental Impact Statement (DEIS)

Communication (4/19/2021)

Errors and Omissions in the OMF South Draft Environmental Impact Statement (DEIS)

From: Arnold DeWalt <arnolddewalt@comcast.net>

Sent: Monday, April 19, 2021 4:46 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: Errors and Omissions in OMF South Draft Environmental Impact Statement (DEIS)

To all who are evaluating the OMF DEIS,

The Draft EIS is a good effort but does not accurately nor fully reflect the impacts of the selection of an OMF South site.

There is much to be considered and how it will affect the community where the OMF is eventually located. The Draft EIS appears to have some flaws and omissions in the DEIS and how it is evaluated.

PEOPLE AFFECTED

The 344th site relies on estimates of the employees in the various businesses and largely discounts the owners of Garage Town condominium (They are included only as a footnote on page 17 in the EIS). It appears that the Sixty-Seven, 67, parcels in GT aren't really significant because they are not live-in residences nor full blown business fronts ... in short **the owners of 67 parcels** that comprise Garage Town really **don't count** for anything in the EIS.

344th site:

At the very least 276 lives affected including GT owners

By far the largest number of people and jobs affected than any other site.

336th site:

The fewest number of people affected at this site.

Midway Landfill:

Slightly more people than the 336th site

JOBS and REVENUE

The OMF will have a significant effect on the jobs and revenue supported by the sites under consideration.

344th site:

How many jobs will be eliminated by the OMF if this site is chosen Many more than the estimate in the EIS, especially if you count the people working for the businesses in Garage Town and surrounding areas. Sound Transit making a guess of how many jobs are affected is not a good way, when the demographics aren't a simple matter of assigning "x" jobs to this business and a "y" to that business and so on. What about the jobs that will be lost to outside companies that come in to support all the business and GT units.

GT is a concentration of taxable properties Together with the other properties this site generates twice the revenue of the 336th site and over three times the revenue of the Midway Landfill site.

336th site:

A large portion of this site generates little revenue for the for King County and Federal Way. Less than half of the 344th site.

Midway Landfill

This site generate one-sixth of the revenue of the 344th site.

Although I am not a "resident" or operate a store front at this site I do pay approximately \$3,000 every year to King County and Federal Way in property tax. I also concentrate a lot of my shopping in Federal Way because I often go to Garage Town to work on various projects. Multiply this by the the Garage Town owners and other businesses and by not choosing the Midway Landfill you will be denying a significant source of increasing revenue to King County, Federal Way and local businesses each and every year.

COSTS

In the long run the Midway Landfill is probably the cheapest alternative when you consider that the other two options take away hundreds of jobs and valuable tax base from the community forever, while the Midway Landfill takes away the least and adds the most in terms of jobs and mitigates the most environmental impact if done correctly. I don't feel enough emphasis has been given in the EIS to these costs to the community.

The long term benefits to choosing the landfill are enormous in terms of minimal environmental impact (not messing with forests and streams that would be best left alone). Using the Midway Landfill would help fix an existing environmental problem without creating new environmental concerns and ecological costs to the Federal Way Community.

ESTHETICS & ENVIRONMENT

Using either the 336th or 334th site would add an eye-sore to the Federal Way community, light pollution and noise pollution to the community. Federal Way has precious few undisturbed habitats ... why disturb more ecological niches more by not using the Midway landfill. These Environmental problems can be avoided by choosing the Federal Way Landfill.

SUMMARY

While the DEIS appears to be impartial in its evaluation criteria, it seems that several important data and concerns have been downplayed or omitted in it. There are far more people than indicated in the DEIS that would have to be relocated were the 344th site be chosen, yet there is NO place to relocate to!

There is NO WHERE in King County to relocate a facility like Garage Town. Garage Town is a unique facility, with no peer in King County or any other surrounding county. Likewise Elenos Yogurt was specifically located where it is now because of the environment of the surrounding area, not just the property where it is located.

It's obvious the OMF Team has done its best to create a fair and balanced evaluation of the three sites being considered for the OMF. However, I believe they have inadvertently overlooked some of the unique circumstances involved with the various properties, property owners and "resident" population. Just because people don't operate a business or live on their property, doesn't mean people aren't significantly affected by the decisions to be made about and have a vested the OMF South location.

Since the Midway Landfill is a "Superfund" site, it would appear that some funds might be available to help clean it up decreasing the estimated costs to Sound Transit significantly.

This e-mail is an attempt to bring some of these concerns and considerations to be included and properly weighed in the final EIS

Sincerely,

Arnold DeWalt

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>880475</u>	<u>Arnold Dewalt</u>	Individual	253-850-7352 253-740-9666	<u>arnolddewalt@comcast.net</u>

Communication ID: 473820 - OMF Facility

Communication (4/19/2021)

OMF Facility

From: Paula Baerenwald <logoped22@yahoo.com>

Sent: Monday, April 19, 2021 10:46 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF facility

Hello,

My name is Paula Baerenwald. I am a 23-year resident of Federal Way. I am strongly opposed to the OMF facility being built anywhere but the Superfund site. Building the OMF on any of the other proposed sites would be extremely disruptive to businesses that have decided to call Federal Way home. Cities in South West King County have the lowest socioeconomic status in King County. In order to lift South West King County up, and create economic diversity, we need to boost economic development not destroy it. Destroying businesses for the OMF will cause them to leave South West King County and will be counter-productive to our goal of economic improvements. Destroying businesses in South West King County will disproportionately impact the lowest-wage earners, earners who live and work in Federal Way, many of whom are people of color. To mitigate the economic impact to the lowest wage earners, Sound Transit needs to find a site with the least economic impact on the community.

While I have heard that the Superfund site would be more expensive to build on, it will have the least impact on existing Federal Way businesses and therefore on Federal Way's economic base. The Superfund site is the most useful for the OMF and construction on Superfund sites for the greater good of a community is not a novel concept. One of the most successful Superfund Repurposing projects has been the Ruston Waterfront project in Tacoma as an example. Repurposing one of the Midway Landfills, which are capped Superfund sites, is not new in WA state as there are many such projects where community improvements have been built upon capped sites. In this link below, you will be able to read about a variety of successful uses for Superfund Sites across the nation and you can read specifically about capped sites. <https://www.epa.gov/superfund-redevelopment-initiative/superfund-site-use-spotlights>

Building on the Midway Landfill site is the most desirable and makes the most sense so not to have a disproportionate impact on the Federal Way community, the part of South West King County that needs the most economic development to lift up South West King County's lowest income earners. It was reported that you anticipate that there may be problems with development of the Midway Landfill that may delay your opening in 2026. For this reason, I urged you to begin working on taking care of the EPA issues early on in this process. About 2-3 years ago. If you did not, then there I believe that this midway landfill was not really a choice. In fact it was presented as a false choice, a decoy. There is precedent for developments of these capped Superfund sites. You can do it. Preserve the businesses of South West King County. Preserve the potential for improved economic development. Develop the Superfund site for the greater good of our struggling community. If you can not, I urge you instead to re-consider your previous options #1 and #4 that you presented in 2017. Show South West King County, its businesses, its employees and residents that they are an important part of the future of the Puget Sound with your thoughtful action on this request.

Regards,
Paula Baerenwald

Sent from Yahoo Mail for iPhone

Owner(s):

Contact ID	Name	Type	Phones	Email
884563	Paula Baerenwald	Individual		logoped22@yahoo.com

Communication ID: 473822 - OMF South DEIS Email Comment

Communication (4/18/2021)

OMF South DEIS Email Comment

From: baloo@hollawayhome.com <baloo@hollawayhome.com>

Sent: Sunday, April 18, 2021 7:32 PM

To: OMFSouthDEIS <OMFSouthDEIS@soundtransit.org>

Subject: OMF South Scoping

OMF South Scoping

I am writing to you in opposition of a OMF being built along/at 20th Ave. S. Federal Way or 16th Ave. S.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy equipment zoning is not tolerated so close to the protected Hylebos Creek as it lies within a Resource Protection area.

The proposed site at 16th Ave. S. is zoned Business Park, also not HIE. Residential neighborhoods pre- existing the Business Park zoning in the area and has persisted as a single-family residential area for more than two decades.

Ellenos Yogurt is the largest employer in the city of Federal Way. The OMF would displace this business. This company has spent over 5 million dollars upgrading their facility in the last few years. They and the other surrounding businesses should not have to vacate, especially in today's climate, where small businesses are struggling to survive. We are proud of this local business and they have our full support.

The collective impacts to businesses/residents in Federal Way from Sound Transit is extensive.

The presence of your facilities/stations/lines/link should not be wherever one happens to be in Federal Way.

Sound Transit please find another location for your OMF.

The current zoning at the Christian Faith Center (CFC) is multi family. Zoning for the OMF at the 20th Ave. S. site would require Heavy Industrial Equipment. (HEI) Heavy Equipment Zoning would certainly not be compatible for the protected Hylebos Creek as it lies within a Resource Protection area within the 20th Ave. S. site.

Both of the mentioned sites have portions Hylebos waterway within them. Federal Way has inventoried and classified these creeks as MAJOR STREAMS. The Hylebos is listed as Class A waters under State Water quality standards.

During the construction of the church in 2004, 35,936 sq. ft. of wetlands were displaced/filled in order to create the largest church campus in the state. This area is a part of the International Flight Pathway. Over 150 migratory birds depend on the Hylebos and the surroundings for rest, food and water. The Resource Protection area would be eliminated/buried if the link line is not elevated, as it is in direct line of the Hylebos. This land cannot tolerate any more abuses or alterations. The allotted percentage for this space to be developed, was taken 20 years ago. This land needs to remain as is.

The head waters for the East Branch of the Hylebos are received via North Lake less than 1/8 of a mile from this proposed site. These waters are paramount for downstream juvenile salmon recovery. Microbenthic invertebrate must travel freely along trees, rocks and water. Culverting the Hylebos at this critical junction goes against the entire purpose of the Executive Proposed Hylebos and Lower Puget Sound Watershed Plan. This document created in the 1990's is a roadmap for thoughtful development to the Hylebos. Allowing not only the link line, but the extra line of track to reach OMF, on top of an OMF, at either site in Federal Way is utterly mindboggling in regards to environmental impacts. The residents of Federal Way remember the planning process for the church, vividly! It took 4 years to finally settle on a compromise and protections for the waterway. The citizens of Federal Way are not going to allow your facility to be built here. The once beautiful forest and its inhabitants was taken from us once. Any further manipulations to the property will destroy what is left of the wetland connectivity and water quantity in the East Branch of the Hylebos.

Sound Transit please find another location for your OMF.

The Midway Landfill is the most obvious choice and one I support. Although the cost and time may make this an unviable option. In that instance, could you please revisit your #1 (S. 352nd St.) & #4 (Fife) site options that WERE discussed 2017?

Both of these options are landfills that received toxic dumping's from Boeing and Asarco. Site #1 is an environmental nightmare because this land was never created to serve or function as a land fill, nor was this dumping site closed properly. The Petroleum pipeline that runs parallel with I-5, also runs through a portion of this land. This line was installed with NO protective barriers. The line now serves as a conduit for leachates, and aids their distribution into our aquifer/ Hylebos watershed. Couldn't this be a win win for the environment, residents and Sound transit?

Minimal costs in comparison with the Midway landfill. If Sound Transit is willing to tackle the Midway landfill, surely other landfill sites could be another viable option. It is up to Sound Transit to work with the public. It is ST who needs to find other solutions. Sound Transit MUST do its due diligence and exhaust all possibilities. The citizens of Federal Way will not accept another major

disruption to our city.

Sound Transit please find another site for your OMF.

The citizens of Federal Way have spent the last 5 years fighting to protect and preserve the former Weyerhaeuser Campus that lies just East of these proposed sites. We have fought against the unprecedented traffic impacts that will result if the Campus is fully built out. With Highway 18 and 320th St. at maximum failure today, the S. 336th St. offers residents a way to reach our city establishments. Supreme Court recently ruled the City of Federal Way and IRG WILL adhere to the Executive Proposed Hylebos Watershed Plan as well as view any developments through cumulative eyes in regards to environmental impacts. The church site demands this total lens as it is a part of the original Weyerhaeuser Campus/Forest. Our city is already being accommodating for the link line and transfer stations being built along 320th. How much more will Federal Way have to endure?

We will not allow Sound Transit to hold us hostage for the next 10 years. You must work with the citizens of Federal Way. Mayor Strong council leaves our Council members and citizens very little voice in how our city functions. Sound Transit is NOT the city of Federal Way and the citizens should be heard and respected as our concerns are valid.

I respectfully submit these comments and expect fully to be engaged with the community and Sound Transit going forward. You told citizens in print as well as at Zoom meeting, that this was not a done deal. One of your representatives along with FW council members told me directly and bluntly that the decision HAS been made to put the OMF at either FW sites. This certainly shows a serious conflict of interest and one that needs to be made transparent to all going forward. Sound Transit is said to be misleading and confuses the public. For instance: staging public meetings and telling the public their input is needed and valued, only to find out events are for trivial items like art installations. Sound Transit then takes public input on Art and transfers that into dialogue and discussion on the important items like an OMF. Transparency is vital and should be upheld to the highest standards.

I am confident a better solution for your facility can and will be found. It will not be within the city limits.

Thank you for your time and thoughtful consideration.

Respectfully,

Dana Hollaway

Federal Way WA 98023

Owner(s):

Contact ID	Name	Type	Phones	Email
890613	Dana Hollaway	Individual	206-714-6437 (Cell)	baloo@hollawayhome.com

Communication ID: 473888 - OMF South EIS Draft

Communication (4/17/2021)

OMF South EIS Draft

From: Ken Broyles <aog9354@yahoo.com>

Sent: Saturday, April 17, 2021 10:47 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: OMF South EIS Draft

I looked over the Draft EIS & it does not correctly count the number of property owners and businesses that would be impacted by building the OMFS on the South 344th site. I not sure why because Sound Transit send out fliers to all of the 67 owners & businesses within GarageTown. Even at the 1st meeting I went to back in 2019 Sound Transit said on the 344th site there were only 35 residents & businesses that would be effected if the OMF was built on site. When an owner at GarageTown got up to speak for the 3 minutes and said I'm not sure where you came up with that 35 number because we have 67 units that pay taxes ever year on their owned property at GarageTown.

I just want the EIS daft to be fair and accurate. Hopefully this mistake can be fixed in the draft before it is put up to a vote by the board members of Sound Transit.

I have looked all over to try & find a similar facility in Western Washington to buy & move if my garage to if Sound Transit decided to build the OMF on the 344th site. I have not been able to find anything similar.

Best Regards, Kenneth Broyles

Owner(s):

Contact ID	Name	Type	Phones	Email
890500	Ken Broyles	Individual	253-312-5603	aog9354@yahoo.com

Communication ID: 473890 - Concerning the OMF South & S 344th St Federal Way

Communication (4/19/2021)

Concerning the OMF South & S 344th St Federal Way

From: Molly Haigh <mollyhaigh@icloud.com>

Sent: Monday, April 19, 2021 10:56 AM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: Concerning the OMF South & S 344th St Federal Way

Members of the Sound Transit Board,

I have read the Draft EIS Statement for your OMF South facility. Based on your research, selecting the S 344th Street site would eliminate over 248 jobs from the community, evict 3 churches, level more than 67 affordable homes, and erase 12 small businesses and the last industrial blue-collar jobs in Federal Way. Our community cannot afford to lose this neighborhood.

Please consider the other sites instead of this one. This is an easy choice, backed up by your data, that I expect you to make to benefit our community.

Thank you.

Molly

Owner(s):

Contact ID	Name	Type	Phones	Email
884586	Molly Haigh	Individual		mhaigh24@gmail.com - molly@hellobitesociety.com

Communication ID: 473891 - OMF SITE

Communication (4/19/2021)

OMF SITE

From: Tylerrb14 <tylerrb14@gmail.com>

Sent: Monday, April 19, 2021 7:09 PM

To: Email The Board <EmailTheBoard@soundtransit.org>

Subject: OMF SITE

Board Members,

I just would like to let you know you need to choose another site for your OMF and leave the 344th site alone. My brother and I have spend a lot of time at my Grandpa's garage learning how to use tools and work on projects. My Grandpa told me that when he was growing up there were classes in school to teach woodworking, metal shop, welding automotive classes. He has taught us so much and we love going there to learn. Also there are a lot of new friends and neighbors that we have met over the years at the 344th site. So please consider one of the other 2 sites for the OMF and leave my Grandpa's garage alone. We have a lot more to learn because schools don't offer classes like this anymore.

Thank you, Tyler Broyles

Owner(s):

Contact ID	Name	Type	Phones	Email
879731	Tyler Broyles	Individual		tylerrb14@gmail.com

Communication (4/19/2021)

OMF South Draft EIS Letter

19 April 2019

To all who are evaluating the OMF DEIS,

The Draft EIS is a good effort but does not accurately nor fully reflect the impacts of the selection of an OMF South site. There is much to be considered and how it will affect the community where the OMF is eventually located. The Draft EIS appears to have some flaws and omissions in the DEIS and how it is evaluated.

PEOPLE AFFECTED

The 344th site relies on estimates of the employees in the various businesses and largely discounts the owners of Garage Town condominium (They are included only as a footnote on page 17 in the EIS). It appears that the Sixty-Seven, 67, parcels in GT aren't really significant because they are not five-in residences nor full blown business fronts ... in short the **owners of 67 parcels** that comprise Garage Town really **don't count** for anything in the EIS.

344th site:

At the very least 276 lives affected including GT owners
By far the largest number of people and jobs affected than any other site.

336th site:

The fewest number of people affected at this site.

Midway Landfill: . Slightly more people than the 336th site

JOBS and REVENUE

The OMF will have a significant effect on the jobs and revenue supported by the sites under consideration.

344th site:

How many jobs will be eliminated by the OMF if this site is chosen Many more than the estimate in the EIS, especially if you count the people working for the businesses in Garage Town and surrounding areas. Sound Transit making a guess of how many jobs are affected is not a good way, when the demographics aren't a simple matter of assigning "x" jobs to this business and a "y" to that business and so on. What about the jobs that will be lost to outside companies that come in to support all the business and GT units.

GT is a concentration of taxable properties. Together with the other properties this site generates twice the revenue of the 3 36th site and over three times the revenue of the Midway Landfill site.

336th site:

A large portion of this site generates little revenue for the for King County and Federal Way.
Less than half of the 344th site.

Midway Landfill

This site generates one-sixth of the revenue of the 344th site.

Although I am not a "resident" (one who lives on their property) or operate a store front at this site I do pay approximately \$5,000 every year to King County and Federal Way in property tax. I also concentrate a lot of my shopping in Federal Way because I often go to Garage Town to work on various projects. Multiply this by the other Garage Town owners and other businesses and by not choosing the Midway Landfill you will be denying a significant source of increasing revenue to King County, Federal Way and local businesses each and every year.

In the long run the Midway Landfill is probably the cheapest alternative when you consider that the other two options take away hundreds of jobs and valuable tax base from the community forever, while the

Midway Landfill takes away the least and adds the most in terms of jobs and mitigates the most environmental impact if done correctly. I don't feel enough emphasis has been given in the EIS to these costs to the community.

The long term benefits to choosing the landfill are enormous in terms of minimal environmental impact (not messing with forests and streams that would be best left alone). Using the Midway Landfill would help fix an existing environmental problem without creating new environmental concerns and ecological costs to the Federal Way Community.

ESTHETICS & ENVIRONMENT

Using either the 336th or 334th site would add an eye-sore to the Federal Way community, light pollution and noise pollution to the community. Federal Way has precious few undisturbed habitats

... why disturb more ecological niches more by not using the Midway landfill. These Environmental problems can be avoided by choosing the Federal Way l.,andfill.

SUMMARY

While the DEIS appears to be impartial in its evaluation criteria, it seems that several important data and concerns have been downplayed or omitted in it. There are far more people than indicated in the DEIS that would have to be relocated were the 344th site be chosen, yet there is NO place to relocate to!

These is NO WHERE in King County to relocate a facility like Garage Town. Garage Town is a unique facility, with no peer in King County or any other surrounding county. Likewise, Elenos Yogurt was specifically located where it is now because of the environment of the surrounding area, not just the property where it is located.

It's obvious the OMF Team has done its best to create a fair and balanced evaluation of the three sites being considered for the OMF. However, I believe they have inadvertently overlooked some of the unique circumstances involved with the various properties, property owners and "resident" population. Just because people don't operate a business or live on their property, doesn't mean people aren't significantly affected by the decisions to be made about and have a vested interest in the OMF South location.

Since the Midway Landfill is a "Superfund" site, it would appear that some funds might be available to help clean it up decreasing the estimated costs to Sound Transit significantly.

Sincerely, Arnold DeWalt

Arnold DeWalt
26821 Carnaby Way
Kent, Washington 98032

OMF South, c/o Hussein Rehmat

Sound Transit
401 S Jackson Street
Seattle, WA 98104

Documents: 20210421 DeWalt_Rehmat_OMF South Certified Mail.pdf

Owner(s):

Contact ID	Name	Type	Phones	Email
880475	Arnold Dewalt	Individual	253-850-7352 253-740-9666	arnolddewalt@comcast.net

Communication ID: 474296 - OMF South DEIS OOH Comment 55

Communication (4/9/2021)
OMF South DEIS OOH Comment 55

We strongly support the Midway landfill alternative!!

Owner(s):

Contact ID	Name	Type	Phones	Email
1028413	Deidre Daly	Individual		Realdeals2@aol.com

Communication ID: 474297 - OMF South DEIS OOH Comment 63

Communication (4/10/2021)

OMF South DEIS OOH Comment 63

I think the best site is Midway Landfill. It would have the least impact on adjacent communities. Added cost to cleanup the landfill are appropriate for this type of project.

Communication ID: 474298 - OMF South DEIS OOH Comment 65

Communication (4/11/2021)

OMF South DEIS OOH Comment 65

I strongly oppose both Federal Way sites in favor of the Midway Landfill Full Excavation alternative. The full excavation appears to be the least expensive of the options at the landfill. The only reason provided in the draft EIS not to build on the Midway Landfill is the higher cost. With the increasing economic division across the county, Federal Way cannot afford to lose jobs, homes, community connections, and funding from property tax revenue. It is time that King County invest in the south end of the county. The impacts to our wetlands and streams are an important and lasting environmental impact as well. The cost to our community long term of putting the OMF South in Federal Way could be far greater than the immediate expense consideration. If the funds are not immediately available, I would hope that there could be Federal Grand funding for the superfund site or other sources of funding that are unique to this site. Building the OMF site in Federal Way is not an equitable option and the Midway site is a win-win for all communities and worth the investment for our communities.

Owner(s):

Contact ID	Name	Type	Phones	Email
925714	Anna Patrick	Individual		thepatrickfour@gmail.com

Communication ID: 474299 - OMF South DEIS OOH Comment 64

Communication (4/11/2021)

OMF South DEIS OOH Comment 64

My first question needs to be - why do you need so many maintenance facilities? How many over paid union screwdrivers do we need to pay for? How many businesses and residences have to be bought (with my tax dollars)? Build these facilities in the least dense areas. Only an engineer comes up with crazy ideas like this. The train goes each direction, you only need 4 trains, there could be a couple ready for a breakdown, but there is no reason for a fleet of trains doing nothing. I am uncertain when this project will pay off, as it is unlikely to get used as you think. It's going to become a day/night trip for the homeless. Extend the line now, and build in Fife. Right now, it's all about how to waste the tax dollars. How about finishing one project before moving to another - just look at the airport -- what a mess.

Owner(s):

Contact ID	Name	Type	Phones	Email
1028414	Charae Ashcraft	Individual		taurusinfw2@gmail.com

Communication ID: 474300 - OMF South DEIS OOH Comment 67

Communication (4/13/2021)

OMF South DEIS OOH Comment 67

The Christian Faith Center is the worse site of all. It is too close to the west side of North Lake which had Herons, Eagles and Osprey fishing on the lake. Just yesterday (4/13/21) I was able to watch a heron fishing from several points along the lake on the unpopulated west side. The eagles fly to the west with their catches to feed their young and immature chicks. The Midway property is the best as there are no huge trees to shelter eagles and osprey nests. Midway is closer to a non-residential area and easier to reach than the North Lake property. Runoff and noise will impact these birds and drive them away. Please think of our environment while making your plans. Thank you

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1028415</u>	<u>Carol Qually</u>	Individual		<u>lcqually@msn.com</u>

Communication ID: 474302 - OMF South DEIS OOH Comment 69

Communication (4/14/2021)

OMF South DEIS OOH Comment 69

I think the Midway Land fill is the best sight with less disruption to personal and business in the other locations.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1028417</u>	<u>James Kostohris</u>	Individual		<u>jimmyk69@msn.com</u>

Communication ID: 474303 - OMF South DEIS OOH Comment 68

Communication (4/14/2021)

OMF South DEIS OOH Comment 68

The Draft EIS does not correctly count the number of property owners and businesses that would be impacted by building the OMFS on the South 344th site. The Garage Town facility at 2010 S 344th Street is a condominium consisting of 67 individually-owned tax parcels. The Draft EIS does not classify Garage Town owners as commercial owners or residential owners and these individuals are not included in the count of property owners or parcels (even though occupants of a 4 plex were so counted). See Table ES-1 on page ES-17 of the Executive Summary. The table only shows 20 Residential and 11 Business Displacements for the entire South 344th Street Site. Garage Town alone has 67 separate individual Condominium parcels and owners. Also see Table 3.5-5 in the Draft EIS. This inaccurate count distorts the true number of individuals impacted in the data for the South 344th Street site contained in the Executive Summary. These inaccuracies must be corrected before the final EIS is completed so that the true scope of the impact on the Federal Way community is known before the "preferred alternative" is selected. In addition, there is no indication in the Draft EIS that there is NO other facility like Garage Town in the Puget Sound area. Relocation of those property owners is not feasible because there is NO equivalent facility for them to move into. Multiple businesses, landlords, and private owners would be eliminated from the community as a result. This adverse impact on the community should be clearly stated in the final EIS so that this undesirable outcome can be properly taken into account as the final siting decision is made. Thank you for your attention in this matter. Sincerely, Ron Anderson Garage Town Federal Way Owner

Owner(s):

Contact ID	Name	Type	Phones	Email
1028418	Ron Anderson	Individual		rjander@yahoo.com

Communication ID: 474304 - OMF South DEIS OOH Comment 95

Communication (4/15/2021)

OMF South DEIS OOH Comment 95

Please buy us out. This neighborhood isn't that great. We don't have kids playing at each other's houses and riding bikes and whatnot. We're not a super friendly street. Plus, the proximity to Walmart means we have a lot of random people walking by, good and bad. We've also had a lot of vehicle break ins. Anyway, I know the public seems to have a concern for the forested space between the buildings and I5, and there's really not much there. Its mostly blackberry brambles taking over some trees. There isn't much wildlife back there. The only concern is the amount of wildlife around the retention pond by the mega church, but I'm sure they'll be able to find a new home in Weyerhaeuser. Also, there are often homeless people living back there, so, its not like anyone can enjoy it anyway. I think the saddest loss would be Ellenos Yogurt. For some reason they're saying they won't be able to start over, but with the right amount, I'm sure they could. I just hope they don't give up. But its not like they have a storefront, so they don't really involve the community. The company just exists in an old sports equipment building and then you see their yogurt in stores. Actually, most of the businesses in that area don't involve the public with a storefront. So its not like it'll be a big blow to the community.

Owner(s):

Contact ID	Name	Type	Phones	Email
940061	Kimberly Conner	Individual	253-397-7651	kima71887@gmail.com

Communication ID: 474305 - OMF South DEIS OOH Comment 94

Communication (4/15/2021)

OMF South DEIS OOH Comment 94

I like the mid-way site. It is more open grown. Better location and transportation is easy to get to. It would be an excellent site.

Owner(s):

Contact ID	Name	Type	Phones	Email
1028419	S. Sheridan	Individual		ssheridan@comcast.net

Communication ID: 474306 - OMF South DEIS OOH Comment 93

Communication (4/15/2021)

OMF South DEIS OOH Comment 93

our Family have been Federal Way residents since 1994. Home prices had started to escalate out or reach in Seattle so we purchased in FW. We DO NOT SUPPORT & WOULD NOT WELCOME the displacement of Christian Faith Center's FW Campus to accommodate the proposed site in Federal Way

Owner(s):

Contact ID	Name	Type	Phones	Email
1028420	Cynthia Jones	Individual		cgoins43@msn.com

Communication ID: 474307 - OMF South DEIS OOH Comment 90

Communication (4/15/2021)

OMF South DEIS OOH Comment 90

The Midway Landfill is the best overall option. Even with the additional cost for site environmental mitigation. Both Federal Way sites will disrupt/remove local important local businesses and community organizations which are integral to that community's growth. If either FW site is chosen, the traffic impact to the main SW Federal Way arterials/roadways would be enormous. It is already incredibly difficult to get around that area with all the new truck traffic from Port of Tacoma as well as the enormous strain that would be placed on the Enchanted Parkway from SW 348th southward. I would like to add that the continued targeting of Federal Way as the depository for all things "industrial" and "dirty" is not doing our community any good. We are struggling to build/rebuild a positive identity and being continually targeted as King County's dumping ground is not acceptable. There are many long time citizens of Federal Way who have worked too long and too hard to try and keep Federal Way a nice place to live and raise a family. Placing the maintenance facility in Federal Way will put a coffin in the city's ability to work on growing as a family-centric community, as opposed to being a dumping site. Please choose the Midway Landfill site. It makes the best, overall sense.

Owner(s):

Contact ID	Name	Type	Phones	Email
1028421	Shannan StClair	Individual		shannan.st.clair@gmail.com

Communication ID: 474308 - OMF South DEIS OOH Comment 89

Communication (4/15/2021)

OMF South DEIS OOH Comment 89

I'm writing to encourage the selection of the landfill site for the OMF rather than locating it in Federal Way. The disruption of families and businesses in Federal Way are too great especially considering the landfill location availability.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>834695</u>	<u>Julie Aulava</u>	Individual		<u>jmaulava@gmail.com</u>

Communication ID: 474309 - OMF South DEIS OOH Comment 88

Communication (4/15/2021)

OMF South DEIS OOH Comment 88

I believe that the midway landfill should be selected as the preferred alternative. By developing the landfill it would be less impactful to the community and the environment. It would cause fewer displacements to organizations, businesses and homes that may be impacted due to light rail construction.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>889182</u>	<u>Katie Lee</u>	Individual	253-298-5429	<u>kathryn1@harsch.com</u>

Communication ID: 474311 - OMF South DEIS OOH Comment 86

Communication (4/15/2021)

OMF South DEIS OOH Comment 86

I am a resident and manager of a business in Federal Way. I bought my home 21 years ago based on the vision of Light Rail in Federal Way. It was not perceived that it would take a quarter of a century for it to happen. My business is located off S. 336th Street so I am well aware of the conditions on both sites. As a transportation professional, since day 1 I have believed that the Midway Landfill alternative should be the preferred alternative, regardless of costs and schedule to construct. The most important aspect of this site is that it allows the reclamation of the landfill site through a costly but public infrastructure investment. As a superfund site, the federal and state government would allow this site to remain as wasted property and a risk to future opportunities. In addition the environmental impacts are minimal when compared to the southern sites. In particular, the disruption to the man-made and natural environment are clearly less as are the socioeconomic impacts. It is recognized that Sound Transits position is to charge ahead without obstacles at this phase of the project. The track record I have observed is one that often lacks in true mitigation, such as traffic access and impacts not controlled by federal or state agencies, at the cost to the local communities. That mitigation is far simpler and more easily identifiable for the landfill site. A lock in of this decision is forever in the project development process. Please do not be short sighted.

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>875374</u>	<u>Glenn Chouinard</u>	Individual		<u>grchouinard@msn.com</u>

Communication ID: 474312 - OMF South DEIS OOH Comment 85

Communication (4/15/2021)

OMF South DEIS OOH Comment 85

Factoring in cost, years to build and displacements, it is my opinion the 336th site would be the best choice.

Owner(s):

Contact ID	Name	Type	Phones	Email
889693	Marlys Dupleich	Individual		tacopaya@comcast.net

Communication ID: 474313 - OMF South DEIS OOH Comment 84

Communication (4/15/2021)

OMF South DEIS OOH Comment 84

I think the 344th location would be best for all of the impact listed.

Communication ID: 474315 - OMF South DEIS OOH Comment 82

Communication (4/15/2021)

OMF South DEIS OOH Comment 82

Use midway landfill area it's the best for this . Other areas are already congested and would be made much worse !!!

Owner(s):

Contact ID	Name	Type	Phones	Email
1028425	Lisa Gardiner	Individual		landjgardiner@comcast.net

Communication ID: 474316 - OMF South DEIS OOH Comment 81

Communication (4/15/2021)

OMF South DEIS OOH Comment 81

None of these options make any financial sense. Renegotiate if necessary restrictions on SODO BASE and expand or double deck. Postpone South base until line gets to Fife or Tacoma where more reasonable sites and construction costs should be available.

Owner(s):

Contact ID	Name	Type	Phones	Email
1028426	Al Levine	Individual		Al.levine@live.com

Communication ID: 474317 - OMF South DEIS OOH Comment 80

Communication (4/15/2021)

OMF South DEIS OOH Comment 80

I would like to express my concerns about location the OMF south at either of the Federal Way sites. The Kent Landfill site seems better suited for the OMF site with simplified access to existing tracks, cleaner access to Hwy 99 and I-5 for staff, and less impact to surrounding residential property and businesses. The Federal Way site may be "cheaper" to build and have a lower projected operating cost but has more negative impacts to surrounding wet-lands and residential property.

Owner(s):

Contact ID	Name	Type	Phones	Email
835799	Steven Dent	Individual		sdent1961@gmail.com

Communication ID: 474318 - OMF South DEIS OOH Comment 79

Communication (4/15/2021)

OMF South DEIS OOH Comment 79

I strongly believe that the Midway Landfill is the best option.

Owner(s):

Contact ID	Name	Type	Phones	Email
1028427	Leonard Barrett	Individual		lensign@rainierconnect.com

Communication ID: 474319 - OMF South DEIS OOH Comment 78

Communication (4/15/2021)

OMF South DEIS OOH Comment 78

Loss of city revenue as land goes off the tax rolls dollars generated at both FW sites. Elimination of some of the only vacant lots for industry. In concert with the proposed ARG development directly east of these sites with semi truck traffic of 900 plus per day not counting for hundreds of workers on the ARG site and the hundreds of transit workers will stop function of the Highway 18 and Weyerhaeuser Way interchange making that area to be very unsafe and totally backed up .

Communication ID: 474320 - OMF South DEIS OOH Comment 77

Communication (4/15/2021)

OMF South DEIS OOH Comment 77

Please use the Midway landfill for the OMF site. This is a great opportunity to make this area usable for an important public resource with the least amount of impact on businesses in the area. This would be great PR for South Transit

Communication ID: 474321 - OMF South DEIS OOH Comment 76

Communication (4/15/2021)

OMF South DEIS OOH Comment 76

I believe the 336th st. site would be the best place for the OMF. It has the least impact on the residential population, businesses and environmental issues. It's also one of the least expensive to build and maintain. There are too many variables and issues to consider at the Midway Landfill site. Although it doesn't impact businesses or residents it would be too costly and lengthy to build.

Owner(s):

Contact ID	Name	Type	Phones	Email
879863	Greg Luke	Individual		gregoryluke@comcast.net

Communication ID: 474322 - OMF South DEIS OOH Comment 75

Communication (4/15/2021)

OMF South DEIS OOH Comment 75

I get the uneasy feeling that Sound Transit has made their decision not to use the Midway site. The old landfill site does pose some construction challenges they wants to avoid. The maintenance facility in South Seattle was built over tide flats that were filled in. The tracks and buildings appear to be doing OK in that area. I fell the Midway site would put to use a large vacant land area and not displace any residents or businesses.

Owner(s):

Contact ID	Name	Type	Phones	Email
890394	Clark Ressler	Individual		cressler9@comcast.net

Communication ID: 474323 - OMF South DEIS OOH Comment 74

Communication (4/15/2021)

OMF South DEIS OOH Comment 74

I. Believe the landfill option is too expensive and will delay the process. I think the church option is not desirable because of the 2 streams that will need to be rerouted. I think the 3rd option is best. The Elenos Yogurt plant and other businesses can find other places to relocate their business within Federal Way. There are lots of empty buildings available. Same with the residents. With the help of Sound Transit's relocation team, the residents will find other places to call home. This is not a desirable place to live because of the crime. My choice is the 3rd option. Thanks for listening.

Communication ID: 474324 - OMF South DEIS OOH Comment 73

Communication (4/15/2021)

OMF South DEIS OOH Comment 73

344th is the best bet

Owner(s):

Contact ID	Name	Type	Phones	Email
1028428	Michael Andrews	Individual		mandrews927@comcast.net

Communication ID: 474325 - OMF South DEIS OOH Comment 72

Communication (4/15/2021)

OMF South DEIS OOH Comment 72

I think you should locate the new maintenance facility at the Midway Landfill. It's the only site that doesn't require existing businesses to relocate. Even though there may be some site cleanup required from the landfill it has to be more cost effective and less disruptive than the other two options. Plus, what else would the old landfill site ever be used for if not the maintenance facility. It is adjacent to I-5 for easy freeway access. I think the landfill site is a no brainer.

Owner(s):

Contact ID	Name	Type	Phones	Email
1028429	Greg Moak	Individual		Greg.moak@gmail.com

Communication ID: 474326 - OMF South DEIS OOH Comment 71

Communication (4/15/2021)

OMF South DEIS OOH Comment 71

I think midway landfill is best. This is not very good economic use of properties in Federal Way.

Communication ID: 474327 - OMF South DEIS OOH Comment 70

Communication (4/15/2021)

OMF South DEIS OOH Comment 70

I'm an owner of Unit B22 at Garage Town, which will be impacted if the South 344th Street is chosen. Three comments: 1. Having visited both the Seattle and Bellevue Maintenance Facilities, they are built on 'billiard table' flat land. This makes the Midway Landfill site the most suitable location, as it uninhabited and flat and immediately adjacent to the light rail tracks already under construction to Federal Way. All these criteria make Midway the most obvious choice, especially if there is any delay in the further extension to Tacoma. 2. Given the South 344th site impacts the highest number of properties, businesses and jobs, I found it difficult to believe that the cost of developing this site was the same as that at South 336th, especially given the physical geography of this site is even to the untrained eye more difficult to navigate/excavate, plus the large number of properties to purchase alone) must make this option significantly more expensive. 3. Throughout the EIS, there is no mention of the weighting given to each of the different assessed study criteria, i.e. what are the most important criteria that the Board will consider. I would request, in the interests of transparency, that these weightings be shared publicly, so we can understand how the final decision will be calculated and arrived at. Midway is the way to go. I trust the Board will make its decision in this direction. Best for the community at large. Many thanks for your consideration, Dave Kingstone, Kenmore, WA (04/15/2021)

Owner(s):

Contact ID	Name	Type	Phones	Email
<u>1028430</u>	<u>DAVID KINGSTONE</u>	Individual		<u>davekingstone@comcast.net</u>

Communication ID: 474908 - OMF South Location in South King County

Communication (4/19/2021)

OMF South Location in South King County

April 19, 2021

Mr. Hussein Rehmat
Sound Transit
401 S. Jackson Street
Seattle, WA 98104

RE: OMF location in South King County

Dear Mr. Hussein Rehmat;

Sound Transit is currently considering three (3) potential alternatives for the location of the new South Operations and Maintenance Facility (OMF). Two locations are in Federal Way and one location is the Kent Midway Landfill site. The focus is narrowing on two locations in Federal Way. This, to me, is a willful disregard to local area communities when a much more logical alternative exists: use of the Kent Midway Landfill site.

The Federal Way locations are detrimental to the local community with regard to housing, business and institution displacement. The resulting disruption serves to negate any positive impact the OMF would have on providing more jobs to the area. Additionally, an OMF at the Federal Way sites would have a detrimental impact to the Hylebos Creek. Building the OMF on the Kent Midway Landfill site would eliminate displacement of residents, businesses and institutions further enhancing the OMF's benefits to local communities. Use of the Kent Midway Landfill site returns a formerly polluted location to productive use instead of doing environmental harm to another area.

The Kent Midway Landfill Superfund Site has been deemed "Site Ready for Reuse and Redevelopment" since 2007. One of the goals of Superfund Cleanup is to return a site to productive use. What better use for this particular site? The eastern perimeter of this site is already being developed for track to be laid for the Federal Way Link Light Rail Extension Project. To use the site to further support our region's transportation infrastructure by choosing it as the South OMF site is a logical next step.

Developing the Kent Midway Landfill Superfund site will be more expensive in the short term, but the long term benefits brought about by added OMF jobs without disruption to local communities and their ecosystems is more than worth that cost. To date, you have not indicated any exploration of federal assistance. With the present administration's goal toward reclaiming land, this is myopic in the extreme.

Investing in the South OMF at the Kent Midway Landfill site now is not only the right thing to do, it is a social, economic and ecological imperative.

Sincerely,

Karen Brugato
Vice-Chairperson
Federal Way Arts Commission
1007 SW 350th Place
Federal Way, WA 98023-8114

CC:

Senator Patty Murray
154 Russell Senate Office Building
Washington DC 20510

Senator Maria Cantwell
511 Hart Senate Office Building
Washington DC 20510

Governor Jay Inslee Office of the Governor POBox40002

Jesse Johnson
JLOB 369
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Olympia, WA
98504-0600

Olympia, WA 98504-0002 Federal Way City Council
33325 8th Ave., South

Claire Wilson
PO Box 40430

Federal Way, WA 98003

Olympia, WA 98504-0430 Mayor Jim Ferrell
33325 8th Ave., South
Federal Way, WA 98003

Owner(s):

Contact ID	Name	Type	Phones	Email
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