



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

OMF South: Title VI  
Facility Equity Analysis

**November 2021**

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## Acronyms and Abbreviations

ACS	U.S. Census Bureau American Communities Survey
Belmor	Belmor Park Golf & Country Club
CFR	Code of Federal Regulations
DOT	U.S. Department of Transportation
EIS	Environmental Impact Statement
FTA	Federal Transit Administration
FWLE	Federal Way Link Extension
I-5	Interstate 5
LOS	level of service
LRV	light rail vehicles
MOW	maintenance of way
NEPA	National Environmental Policy Act
OMF	operations and maintenance facility
OMF South	Operations and Maintenance Facility South
SEPA	State Environmental Policy Act
Sound Transit 3	Sound Transit 3: The Regional Transit System Plan for Central Puget Sound
SR	State Route
ST3	Sound Transit 3
TDLE	Tacoma Dome Link Extension
U.S.C.	United States Code

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# 1 INTRODUCTION

This report has been prepared to evaluate the facility location options for an operations and maintenance facility (OMF) in the South Corridor of Sound Transit's Service District in context of Title VI of the Civil Rights Act. The purpose of the document is to determine whether any of the facility location options would result in a disparate impact to populations based on race, color, or national origin.

Title VI of the Civil Rights Act of 1964 (42 U.S. Code 2000d) protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance. In 1970, the U.S. Department of Transportation (DOT) established Title VI regulations in 49 Code of Federal Register (CFR) Part 21, entitled Non-Discrimination in Federally-Assisted Programs of the Department of Transportation.

As a DOT operating administration, the Federal Transit Administration (FTA) provides financial assistance to develop new transit systems and improve, maintain, and operate existing systems and is responsible for ensuring that recipients follow federal statutory and administrative requirements.

In 2012, FTA issued Circular 4702.1B, which provides recipients of FTA financial assistance with guidance and instructions necessary to carry out DOT's Title VI regulations, regardless of whether federal funding is being provided for the facility.

Additionally, in 2013, Sound Transit adopted Resolution No. R2013-18, which established policies for conducting equity analyses of Major Service Changes impacting minority and low-income populations. Resolution no. R2013-18 provides the basis for the definition of disparate impacts in this analysis.

## 1.1 Background

### 1.1.1 Sound Transit Mission

As stated in the 2020 Five-Year Agency Strategic Plan (Sound Transit 2020), Sound Transit's mission statement is:

Connecting more people to more places to make life better and create equitable opportunities for all.

### 1.1.2 Sound Transit System Planning

Sound Transit's system planning has served to develop the transit improvements throughout the three-county Sound Transit District. Sound Transit is currently implementing the plans of Sound Transit 3: The Regional Transit System Plan for Central Puget Sound (Sound Transit 3). Sound Transit 3 builds on the programs of Sound Move and Sound Transit 2 and seeks to expand the regional light rail system north to Everett; south to Federal Way and Tacoma; east to downtown Redmond, south Kirkland, and Issaquah; and west to Ballard and West Seattle, totaling 116 miles with over 80 stations. Please see Figure 1-1 for a map of Sound Transit's planned future expansion.

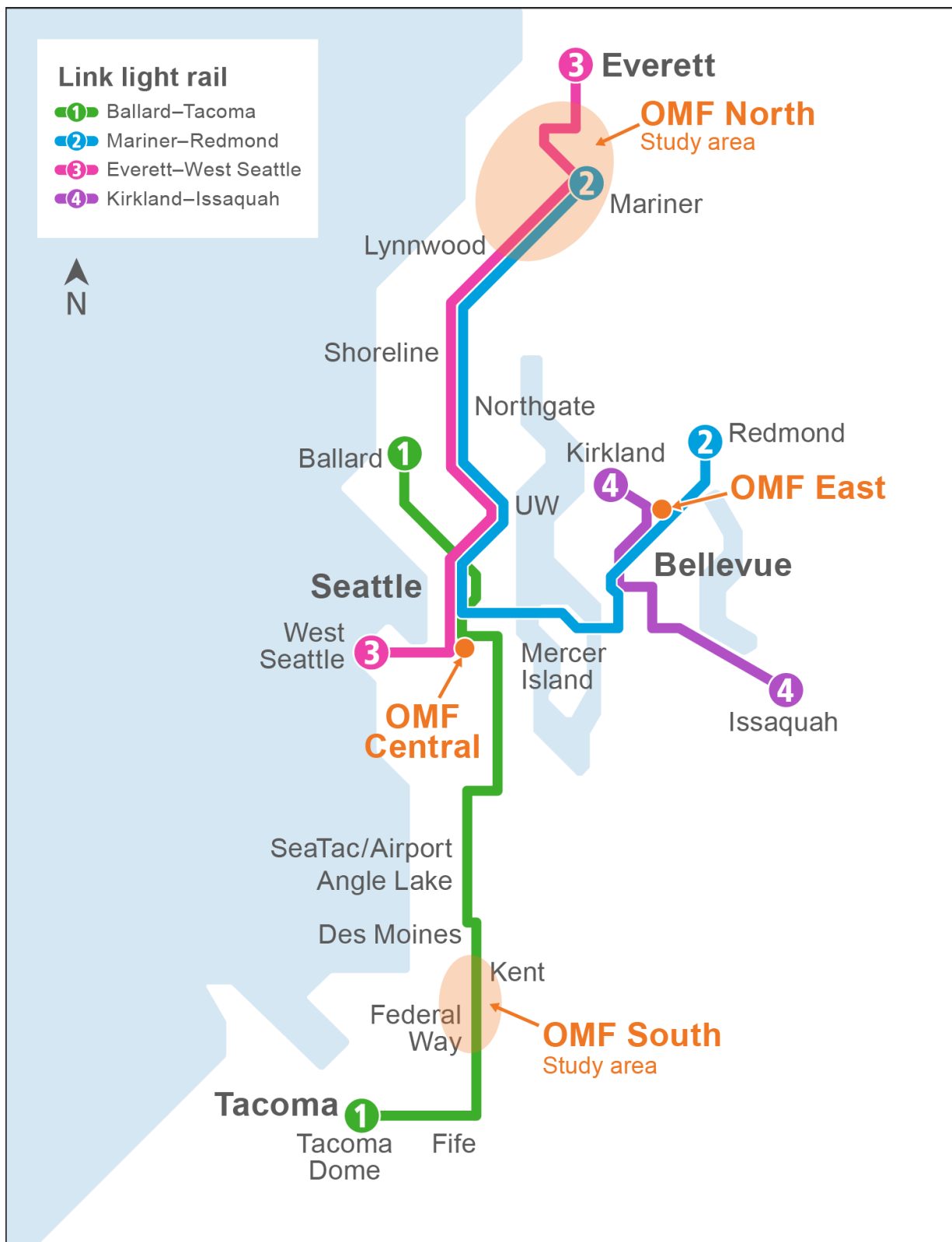


Figure 1-1 Link System Future Expansion and OMF Site Locations



As shown in Figure 1-1, the Sound Transit light rail system will serve four corridors: north, central, south, and east. Improvements and notes about existing or planned maintenance facilities in each of the corridors are outlined below.

- **North Corridor:** Sound Transit 3 extends light rail north from the Lynnwood Transit Center to downtown Everett via the Southwest Everett Industrial Center. The line includes six stations serving the areas of West Alderwood Mall, Ash Way, Mariner, Southwest Everett Industrial Center, SR 526 near Evergreen Way, and the area at the existing Everett Station. Additional parking will be provided at Mariner and Everett stations. A light rail operations and maintenance facility will be located in the North Corridor, with similar programming functions to OMF South. The facility will maintain and store a portion of the light rail fleet for the future Everett to Alaska Junction and Mariner Way to Downtown Redmond services.
- **Central Corridor:** Sound Transit 3 adds two light rail extensions in Seattle. The first extends light rail from downtown Seattle to West Seattle with stations serving the sports stadiums, SODO, Delridge, Avalon, and Alaska Junction. In addition, light rail extends to Ballard with a new subway through downtown Seattle and South Lake Union, with stations serving International District/Chinatown, Midtown, Westlake, Denny, South Lake Union, Seattle Center, Smith Cove, Interbay, and Ballard. Three infill stations will be added serving Northeast 130th Street, South Graham Street, and South Boeing Access Road near I-5, with parking provided at the South Boeing Access Road station. Connections to the existing Forest Street operations and maintenance facility will be built to service vehicles operating in this corridor. OMF Central will maintain and store a portion of the light rail fleet for multiple lines.
- **East Corridor:** Sound Transit 3 extends light rail on the Eastside, connecting Redmond, Bellevue, south Kirkland, and Issaquah to each other and to the rest of the regional system. Eastside investments include two stations serving southeast Redmond and downtown Redmond along with a new light rail line from south Kirkland to Issaquah via Bellevue. Four stations are included on the latter light rail extension serving south Kirkland, the Richards Road area, Eastgate near Bellevue College and central Issaquah. Additional parking will be provided at the southeast Redmond, south Kirkland, and central Issaquah stations. Maintenance needs in the east corridor will be served by OMF East, which was recently completed to maintain and store a portion of the light rail fleet for the Mariner Way to Downtown Redmond and South Kirkland to Issaquah services.
- **South Corridor:** Sound Transit 3 extends light rail south from Kent/Des Moines to Federal Way, with stations serving South 272nd and the Federal Way Transit Center. From there, light rail will continue south to Pierce County, with stations in south Federal Way, Fife, and Tacoma, where it will provide a multimodal connection to the existing Tacoma Link, the Sounder commuter rail, the Sound Transit Express Bus, and Amtrak. Parking will be added at the South 272nd, Federal Way Transit Center, South Federal Way, and Fife stations. Sound Transit 3 also includes an expansion of Tacoma Link to Tacoma Community College, with six stations. OMF South (the proposed project) would be built in the South Corridor to maintain and store a portion of the future light rail fleet for the West Seattle/Ballard to Tacoma Dome service, as well as to receive, test, commission, store, maintain, and deploy new light rail vehicles (LRVs) and materials for maintenance of the guideway for the entire system.

### 1.1.3 OMF South Purpose and Need

The purpose of OMF South is to construct an operations and maintenance facility in the South Corridor to support Sound Transit's Link light rail system expansion as identified in Sound Transit 3. As described above, Sound Transit 3 identified the need for two new OMFs, one in

the North Corridor and a second in the South Corridor, to fully serve existing and future light rail expansions at desired service frequency levels. As the Link light rail system continues to expand, these new facilities would supplement operations at the existing OMF Central and OMF East. All four facilities are needed to implement and operate at desired service levels outlined in the full Sound Transit 3 plan.

OMF South would do the following:

- Provide a facility with the capacity to receive, test, commission, store, maintain, and deploy vehicles to support the intended level of service for the system-wide light rail system expansion.
- Support efficient and reliable light rail service that minimizes system operating costs.
- Support and connect efficiently to the regional system and be technically and financially feasible to build, operate, and maintain, consistent with the Sound Transit 3 Plan and Sound Transit's Regional Transit Long-Range Plan.
- Preserve and promote a healthy and sustainable environment by minimizing adverse impacts to people and the natural and built environments.

The project is needed because:

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

The OMF South project is necessary to support the addition of about 144 LRVs as part of the Sound Transit 3 system expansion, even if construction of light rail extensions throughout the system is phased or delayed. It would provide facilities for vehicle storage, inspections, maintenance, repair, interior vehicle cleaning, and exterior vehicle washing. Additionally, the facility would receive, test, and commission new LRVs for the entire light rail system. If the facility were not to be constructed, Link light rail would operate at reduced transit service levels and would be unable to meet the full operational capacity of the Link system.

OMF South would also be used to accommodate administrative and operational functions, such as serving as a report base for LRV operators. Included is a Maintenance of Way (MOW) building for maintenance and storage of spare parts for tracks, vehicle propulsion equipment, train signals, and other infrastructure in addition to storage facilities for the entire Link system. Other facility elements would include employee and visitor parking, operations staff offices, maintenance staff offices, dispatcher work stations, an employee report room, and areas with lockers, showers, and restrooms for both operators and maintenance personnel.

## 1.2 Regulatory Setting

Chapter III of FTA's Circular 4702.1B describes requirements that all FTA recipients must follow to ensure that their programs, policies, and activities comply with DOT's Title VI regulations. Sound Transit has determined that the selection of a light rail OMF falls under the provisions in

Chapter III-13 of FTA Circular 4702.1B. The following requirements are listed under Determination of Site or Location of Facilities:

13. DETERMINATION OF SITE OR LOCATION OF FACILITIES. Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Therefore, Sound Transit is required to conduct a Title VI equity analysis to ensure the location is selected without regard to race, color, or national origin. Per the guidance in the FTA Circular, this analysis must do the following:

- Compare impacts of various siting alternatives.
- Determine whether cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area.
- Include outreach to persons potentially impacted by the siting of the facility.
- Occur before the selection of the preferred site. If any disparate impacts or disproportionate burdens are identified through the analysis, the least discriminatory alternative must be implemented.

### 1.3 Definitions and Methodology

In the FTA circular “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” (FTA C 4702.1B), FTA defines a disparate impact as a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient’s or implementing agency’s policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effects on the basis of race, color, or national origin. In Resolution No. R2013-18<sup>1</sup>, Sound Transit defines a disparate impact as one that “occurs when the minority percentage of the population adversely affected by a major service change is greater than the average minority percentage of the population of Sound Transit’s service area.”

Building on the definition of disparate impacts in the FTA circular and Resolution No. R2013-18, Sound Transit has defined disparate impacts for the purposes of this facility equity analysis. A

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<sup>1</sup> Resolution No. R2018-18 addresses Sound Transit’s disparate impact policy for fare changes. Because FTA requires an agency to have a consistent definition of disparate impact for all applications, and Sound Transit has not adopted a specific definition of disparate impact for this analysis, the definition from R2013-18 is used as the basis for this analysis.

disparate impact occurs when the minority percentage of the population adversely affected by a facility location is greater than the average minority percentage of the population of Sound Transit's service area. A facility location creates an adverse effect when both direct costs, such as residential and business displacements, and indirect costs, such as construction impacts and public health risks, are greater than the benefits to the surrounding community associated with the proposed facility location. The measurement of the costs and benefits of the facility location alternatives may include quantitative data and qualitative inputs from potentially impacted communities.

The site alternative equity analysis is based on the findings of two "tests," per the FTA Circular (FTA C 4702.1B). Each site is analyzed using the following two-step process:

1. The population within the vicinity of each build alternative is analyzed and compared to the Sound Transit District as a whole to identify whether higher than average minority populations are present.
2. Potential disproportionate direct and indirect impacts (or costs) to minority populations are described, with the consideration of mitigation and offsetting benefits.

Based on the findings of these two steps, a conclusion is made about the potential for disparate impacts at each site. If possible to differentiate, the magnitude of potential disparate impacts are compared between the alternative sites.

## 1.4 Nexus of This Equity Analysis and EIS

Sound Transit is complying with the requirements for environmental review concurrent with the development of this Equity Analysis. In 2018, Sound Transit initiated preparation of an Environmental Impact Statement (EIS) by publishing a Determination of Significance and Scoping notice under the Washington State Environmental Policy Act (SEPA) and published a Draft EIS in March 2021. Both of these documents may be found on Sound Transit's Operations and Maintenance Facility South website at <https://www.soundtransit.org/system-expansion/operations-maintenance-facility-south/documents>.

The Draft EIS analyzes and documents the sites' potential impacts to the natural and built environment and proposes ways to mitigate unavoidable impacts. The EIS and associated public and agency engagement process will inform Sound Transit's decision about which site alternative should be selected and built. The public had the opportunity to review and make formal comment on the Draft EIS in spring 2021. A preferred alternative has not yet been identified.

The EIS process, findings, and public outreach efforts are key elements of this analysis and described in more detail throughout the remainder of this document.

## 2 PROJECT DESCRIPTION AND ALTERNATIVES

### 2.1 Project Context

As described in Section 1.1, Background, Sound Transit requires four OMFs to support its expansion plans across the region. Sound Transit currently services the existing light rail fleet at OMF Central on South Forest Street in Seattle and has recently completed OMF East in Bellevue. To support the service expansion objective under Sound Transit 3, Sound Transit is currently planning to add another OMF north of Seattle and an additional OMF south of Seattle.

As described in the OMF South Alternatives Evaluation Technical Memorandum (Sound Transit 2019a) and summarized below, Sound Transit went through an extensive alternative site selection process for siting an OMF within the South Corridor in a location that meets the project's Purpose and Need. For the purposes of this Facility Equity Analysis, it is important to note that the potential for impacting minority populations is greater in the South Corridor than within other corridors of the Sound Transit district since minority populations tend to be higher in the South Corridor compared to the Sound Transit district as a whole. Figure 2-1 shows the percent of minority population by census tract within Sound Transit's service district that are above and below the district average of 39 percent. As can be seen, there is generally a greater percentage of minority population within the southern end of the district.

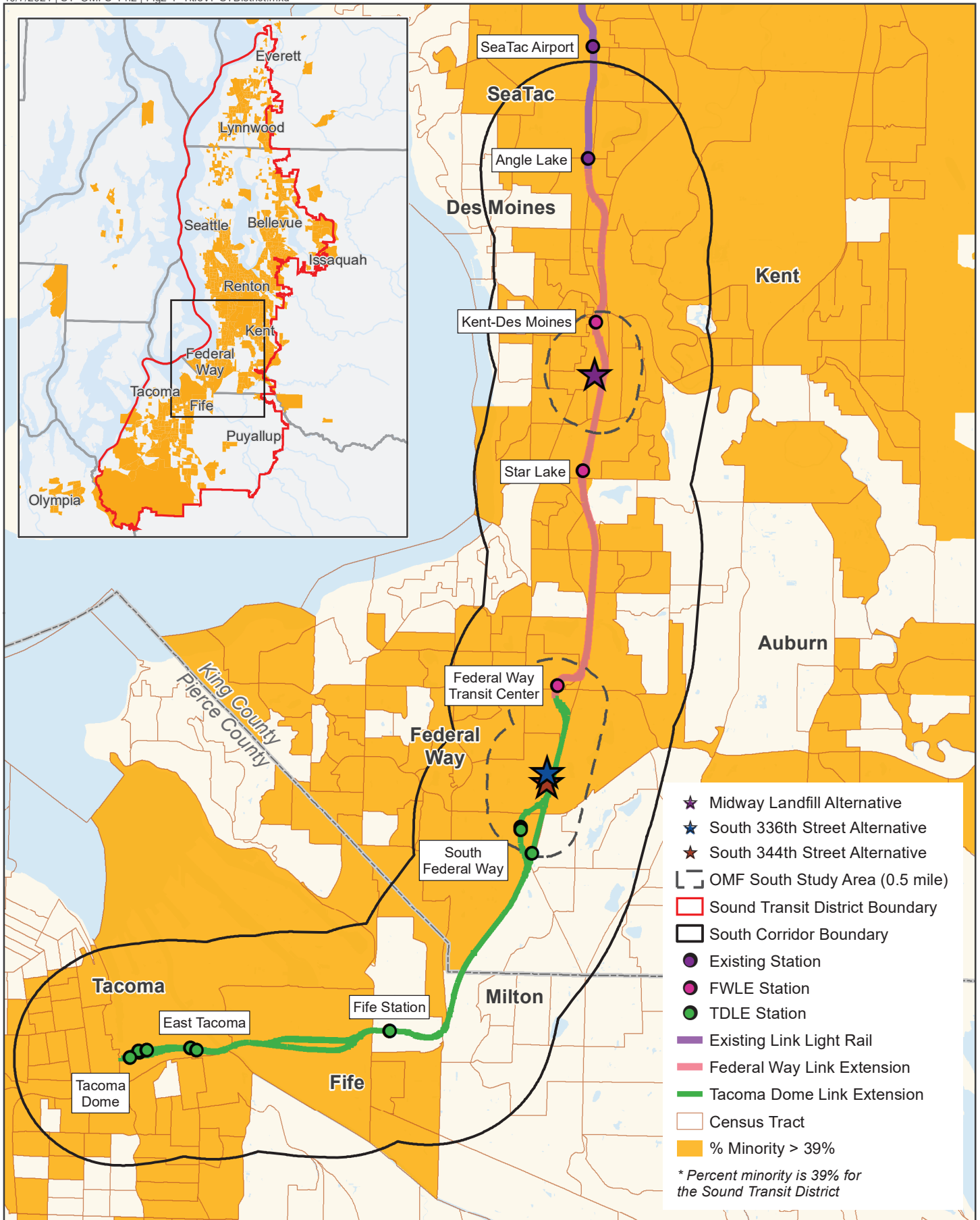
### 2.2 Alternative Sites Selection Process

Beginning in early 2018, Sound Transit conducted early scoping followed by alternative development, including site identification, prescreening, and alternatives evaluation. In early 2019, several alternatives were presented to the public during SEPA scoping, and in May 2019, the Sound Transit Board identified three project alternatives for evaluation in the Draft EIS. A preferred alternative has not yet been identified.

#### 2.2.1 Early Scoping

In March 2018, Sound Transit published the Tacoma Dome Link Extension and Operations and Maintenance Facility South Early Scoping Information Report (Sound Transit 2018a). Early scoping was intended to initiate the public conversation before the start of environmental studies and was conducted for both projects concurrently. The public comment period for early scoping was from April 2 to May 3, 2018, during which Sound Transit asked for public, tribe, and agency comments on the project's Purpose and Need statement; the Tacoma Dome Link Extension (TDLE) "representative project alignment" and other alternative alignments; and alternative locations for an OMF in the South Corridor.

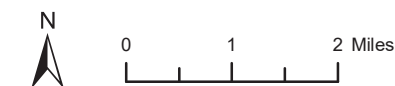
In June 2018, Sound Transit published the Tacoma Dome Link Extension and Operations and Maintenance Facility South Early Scoping Summary Report (Sound Transit 2018b). Sound Transit received approximately 50 comments regarding the potential OMF South location, including suggestions for sites in Kent, Federal Way, Milton, Fife, and Tacoma.



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

**FIGURE 2-1**  
Average Minority Population  
Sound Transit District

OMF South



## 2.2.2 Site Identification and Screening

After early scoping, Sound Transit initiated the alternative development process, evaluating a total of 24 sites. These sites were identified through a series of internal workshops with Sound Transit staff and the consultant team and by the public during early scoping.

The prescreening evaluation used the following three criteria, based on the OMF South Purpose and Need statement, to evaluate the 24 sites identified during early scoping:

1. **Meets minimum size and shape.** This criterion evaluated each site's ability to store and maintain at least 144 LRVs and accommodate a 5-acre storage site.
2. **Roadway improvements.** This criterion considered whether selection of the site would preclude funded roadway improvements.
3. **Regulatory constraints.** This criterion evaluated the potential for severe impacts to known cultural resources, wetlands, and other sensitive areas.

The evaluation criteria were applied to each site using a pass or fail method. If a site failed one criterion, it was not advanced to the next stage in the alternative development process. As a result, six sites were eliminated and two configuration options were added for each Midway Landfill site, for a total of 20 potential sites.

## 2.2.3 Alternatives Evaluation

The alternatives evaluation used a total of 21 criteria to evaluate the 20 sites that moved forward from prescreening (Table 2-1). Criteria were not weighted, but evaluated on a scale from higher to lower performing. Factors included environmental considerations, such as impacts to built and natural resources, as well as operational and cost factors to ensure that the OMF South would be located in a sufficiently sized and accessible location. Relevant to this equity analysis, the neighborhood/community criterion evaluated impacts to major neighborhood/community cohesion and whether impacts would potentially disproportionately affect low-income and minority populations.

As a result of the alternatives evaluation, Sound Transit identified six sites to carry forward to the SEPA EIS scoping process, eliminating 14. The nine southernmost sites, including all of those located in Pierce County, were eliminated because they were not close enough to an operating light rail mainline. Sound Transit also found that potential sites located farther than 1.5 miles south of the Federal Way Link Extension (FWLE) terminus in Federal Way would not be able to efficiently connect to an operating light rail mainline when the OMF South opens, thereby not meeting the project Purpose and Need. Another five sites were eliminated because they performed poorly in other criteria. The complete results of the alternatives evaluation are summarized in the OMF South Alternatives Evaluation Technical Memorandum (Sound Transit 2019a).

**Table 2-1 Evaluation Criteria and Measures**

<b>Criteria</b>	<b>Measures</b>
<b>Environmental Factors</b>	
Current and Proposed Zoning	Suitability of current and proposed zoning/land use for use as an OMF.
Economic	Site located on properties with major economic activity generators.
Property Impacts	Estimated level of property impacts (residential, commercial).
Streets/Roads	Auto and truck access to the site from existing highway/arterial system.
Neighborhood/ Community	Impacts to major neighborhood/community cohesion and whether impacts will be equitably distributed.
Topography	Amount of grading required to accommodate facility.
Wetlands and Streams	Disruption to wetland and stream resources or priority habitat areas on or adjacent to the site.
Floodplains and Critical Areas	Impacts to floodplains or other critical areas.
Parks, Trails, and Open Space	Impacts to parks, trails, or open space.
Historic/Archaeological	Impacts to historic, archaeological resources on or adjacent to the site.
Hazardous Materials/ Brownfields	Potential to impact sites with hazardous materials.
Noise	Potential for impacts to noise-sensitive properties.
<b>Operational and Cost Factors</b>	
Size/Configuration	A minimum site size of 33 acres able to store and maintain approximately 144 vehicles, plus an additional 5-acre storage area that includes a 30,000-square-foot building on or adjacent to the site.
Maintenance Window	Impact on the nightly maintenance window of 1 a.m. to 5 a.m.
LRV Site Access	LRV access to the site related to the complexity of the connection and the distance from the FWLE or TDLE representative alignment.
Schedule Risk (other than LRV access)	Will the facility be able to receive and commission LRVs per ST3 Operations Analysis?
Operability	When the facility (OMF South) opens, will the site be connected to an activated line to allow vehicles to move around the system?
Operating Estimates	Order of magnitude operating estimates.
Capital Estimates	Order of magnitude preliminary capital estimates for the site footprint, 5-acre storage site, and lead track.
Property Value	Assessed value plus escalation factors for each property affected by the project footprint of the facility.
<b>Plan Consistency</b>	
Sound Transit Regional Transit Long-Range/ST3 Plan	Consistent with the Sound Transit Regional Transit Long-Range Plan and ST3 Plan.



## 2.2.4 SEPA Scoping

Sound Transit published the scoping notice for the EIS in the SEPA Register on February 19, 2019. The purpose of scoping is to narrow the focus of the EIS to significant environmental issues, to eliminate insignificant impacts from detailed study, and to identify alternatives to be analyzed in the EIS. Sound Transit also asked for comments regarding the project's Purpose and Need statement.

Sound Transit considered the following six sites during the SEPA scoping process:

1. S 240th Street and State Route (SR) 99
2. Midway Landfill and Interstate 5 (I-5)
3. Midway Landfill and SR 99
4. S 316th Street and Military Road
5. S 336th Street and I-5
6. S 344th Street and I-5

During the public comment period (February 19 to April 1, 2019), Sound Transit accepted comments from agencies, tribes, and the public and conducted two public scoping meetings, an agency scoping meeting, and an online open house.

In May 2019, the Sound Transit Board identified three site alternatives to carry forward for further evaluation: Midway Landfill and I-5, S 336th Street and I-5, and S 344th Street and I-5. These alternatives were renamed Midway Landfill Alternative, South 336th Street Alternative, and South 344th Street Alternative, respectively. The Board's decision was based on the project's Purpose and Need; OMF South site requirements and screening criteria; and input from agencies, tribes, and the public during the scoping period. The remaining three sites — S 240th Street and SR 99, Midway Landfill and SR 99, and S 316th Street and Military Road — were not carried forward.

## 2.2.5 Draft Environmental Impact Statement

Sound Transit published the OMF South Draft EIS on March 5, 2021. The Draft EIS analyzed the No-Build Alternative and three build alternatives, as mentioned above: Midway Landfill Alternative, South 336th Street Alternative, and South 344th Street Alternative.

### 2.2.5.1 No-Build Alternative

The No-Build Alternative represents the transportation system and environment as they would exist without the proposed project and provides a benchmark against which the project alternatives can be compared.

The No-Build Alternative assumes the other Link light rail system improvements listed in Sound Transit 3 would be built, including extensions from downtown Seattle to West Seattle and Ballard; Lynnwood to Everett; Redmond Technology Center to downtown Redmond; south Kirkland to Issaquah; Kent/Des Moines to Federal Way Transit Center; and Federal Way Transit Center to Tacoma Dome. The No-Build Alternative also assumes that the new North Corridor OMF would be constructed. Under Sound Transit's System Expansion Plan, each of these projects would be constructed and operating by 2044.

### 2.2.5.2 Build Alternatives

The three build alternatives are shown in Figure 2-2. The Midway Landfill Alternative is located adjacent to FWLE and would connect by lead tracks directly to the FWLE mainline. The South 336th Street and South 344th Street alternatives would require the construction of between approximately 1.4 and 1.8 miles of mainline tracks from the FWLE terminus. The mainline through Federal Way is planned to be constructed as a part of TDLE, and therefore would be built regardless of which OMF South alternative is selected. However, the impacts from the mainline would occur earlier in time if either the South 336th Street or South 344th Street alternative were built prior to TDLE, so the impacts of the mainline are included in the OMF South Draft EIS and in this document.

#### Midway Landfill Alternative

The Midway Landfill Alternative is located in Kent between S 246th Street and S 252nd Street and between I-5 and SR 99. Because the site would be located adjacent to FWLE, which is scheduled to open as an active light rail line in 2024, there would be no need to build additional mainline.

The programmed site area (development footprint) of the Midway Landfill Alternative is approximately 68 acres, which includes the 2-story OMF building, the 1-story MOW building, the 1-story Link System-Wide Storage building, storage tracks, training tracks, parking, and yard areas. There would be approximately 450 parking spaces, including spaces for employees, visitors, accessible parking, and nonrevenue Sound Transit vehicles. The yard area encompasses approximately 8.5 acres.

#### South 336th Street Alternative

The South 336th Street Alternative is located in Federal Way between S 336th Street and S 341st Place and between I-5 and SR 99, and it would require the construction of approximately 1.4 miles of mainline tracks from the FWLE terminus at the Federal Way Transit Center to the site. There are two alternative alignments for this length of mainline: the TDLE Preferred Alternative, designed for 40 mph, and the TDLE Design Option, designed for 55 mph. Both mainline alignments would be elevated, with north-bound and south-bound tracks. The mainline would extend south approximately 600 feet past the southeast corner of the site to serve as tail tracks to allow trains to access the Link system if the northeast lead tracks were out of service.

The South 336th Street Alternative site footprint is approximately 59 acres, which includes the OMF building, the MOW building, the Link System-Wide Storage building, storage tracks, parking, training tracks, and yard areas. There would be approximately 435 parking spaces, including spaces for employees, visitors, accessible parking, and nonrevenue Sound Transit vehicles. The yard area would be approximately 7.2 acres.



Figure 2-2 OMF South Alternatives

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

The South 344th Street Alternative is located in Federal Way between S 336th Street and S 344th Street and between I-5 and 18th Place S, and it would require the construction of approximately 1.8 miles of mainline tracks from the FWLE terminus at the Federal Way Transit Center to the site. As with the South 336th Street Alternative, there are two alternative alignments for the elevated mainline track leaving the Federal Way Transit Center: the TDLE Preferred Alternative and TDLE Design Option.

The mainline would extend past the southeast corner of the site to serve as tail tracks to access the Link system if the northeast lead tracks are out of service. There are two options for the South 344th Street Alternative tail tracks that follow the design alternatives for TDLE: the Enchanted Parkway alignment that would extend approximately 1,500 feet south of the site and the I-5 alignment that would extend approximately 1,800 feet south of the site. Both tail track options would be elevated their entire length.

The South 344th Street Alternative site footprint is approximately 65 acres, which includes the OMF building, the MOW building, the Link System-Wide Storage building, storage tracks, training tracks, parking, and yard areas. There would be approximately 435 parking spaces, including spaces for employees, visitors, people with disabilities, and spaces for nonrevenue Sound Transit vehicles. The yard area would be approximately 11.2 acres.

## 3 SITE ALTERNATIVE EQUITY ANALYSIS

### 3.1 Demographics

This section describes the demographics in the Sound Transit District, the South Corridor, and by build alternative. The purpose of these comparisons is to understand how the distribution and concentration of minority populations could be affected by each alternative and how they compare to the demographics of the Sound Transit District as a whole.

Demographic information provided is from the U.S. Census Bureau American Communities Survey (ACS) 2014–2018 5-Year estimates. For each Build Alternative, demographic characteristics for minority populations is based on a 0.5-mile buffer around each alternative. A summary of the proportion of minority populations for each alternative, the South Corridor, and the Sound Transit District are shown in Table 3-1.

**Table 3-1 Demographic Characteristics**

	Midway Landfill Alternative	South 336th Street Alternative	South 344th Street Alternative	South Corridor <sup>3</sup>	Sound Transit District
Total Population <sup>1</sup>	9,567	7,973	9,336	188,276	3,158,800
Minority Population <sup>2</sup> (%)	65%	61%	57%	53%	39%

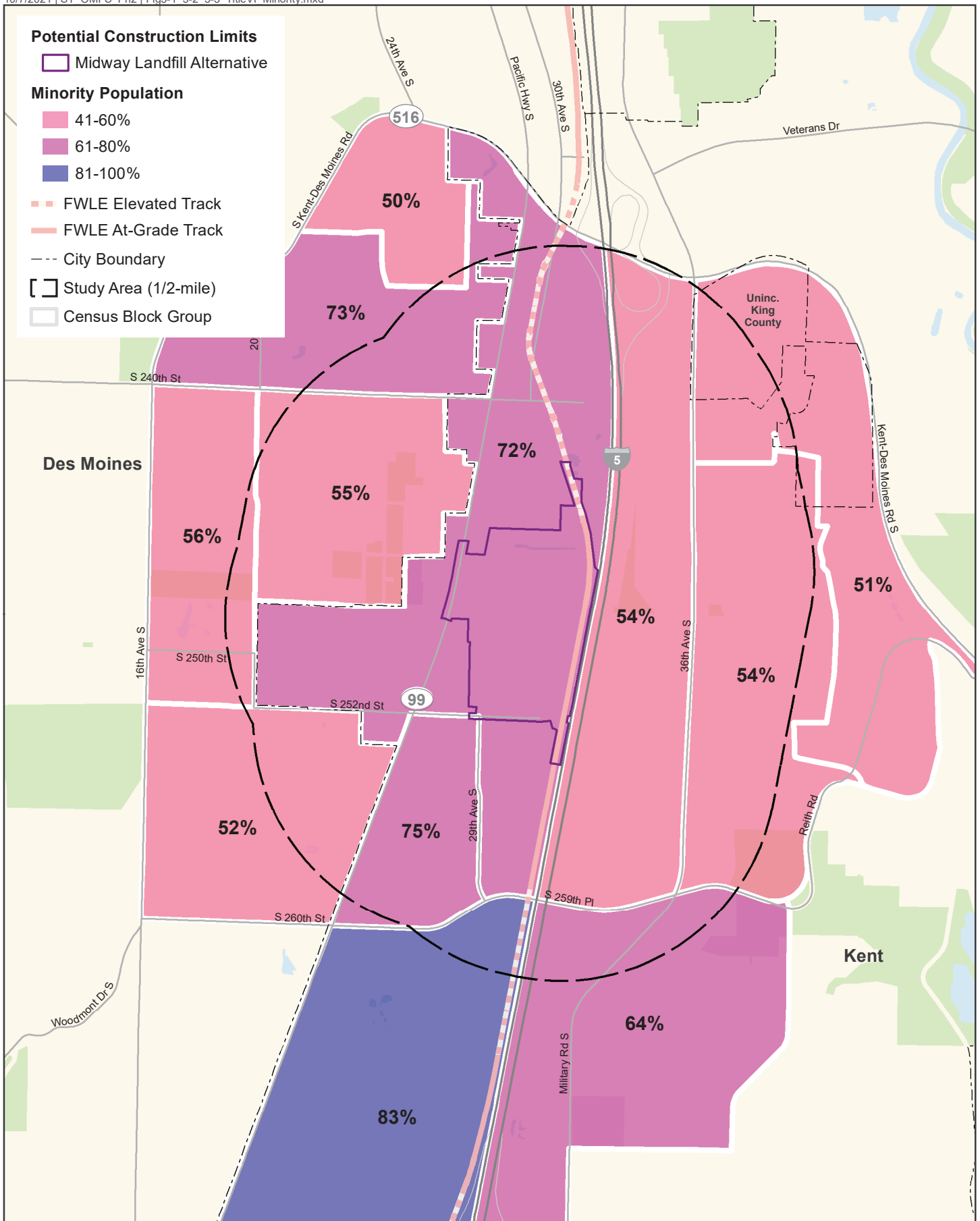
Source: U.S. Census Bureau, American Community Survey (ACS) 2014–2018 5-Year Estimates

Notes:

- (1) Data represents the latest U.S. Census 5-year estimates based on 2014–2018 survey data. Survey data are not available at the census-block level; the data represent an estimate of minority persons in block groups within 0.5 mile of each project alternative, which was the study area used in the OMF South Draft EIS.
- (2) Minority is defined as all but Non-Hispanic White Alone.
- (3) For the purposes of this analysis, the South Corridor is defined as a 1.5-mile buffer area around the Link light rail alignment from the terminus of Central Link at Angle Lake to the terminus of the Tacoma Dome Link Extension at the Tacoma Dome. This is consistent with the area along the planned southern light rail alignment that was considered for possible location of OMF South.

#### 3.1.1 Midway Landfill Alternative

The Midway Landfill Alternative in Kent includes the highest proportion of minority residents as compared with the two alternatives located in Federal Way. The study area for the Midway Landfill Alternative represents approximately 9,600 residents. Of these residents, approximately 65 percent are reported as minorities, compared to the 39 percent for the Sound Transit District as a whole and 53 percent in the South Corridor. Figure 3-1 depicts the proportion of minority population, by block group, for the Midway Landfill Alternative.



Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2019); U.S. Census Bureau ACS (2019).

**FIGURE 3-1**  
Minority Population Distribution  
Midway Landfill Alternative



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### 3.1.2 South 336th Street Alternative

The study area for the South 336th Street Alternative in Federal Way is comprised of a minority population of 7,973 persons, accounting for 61 percent of the population, which is higher than the 39 percent minority population for the Sound Transit District as a whole and the 53 percent minority population for the South Corridor. Figure 3-2 depicts the proportion of minority population, by block group, for the South 336th Street Alternative.

### 3.1.3 South 344th Street Alternative

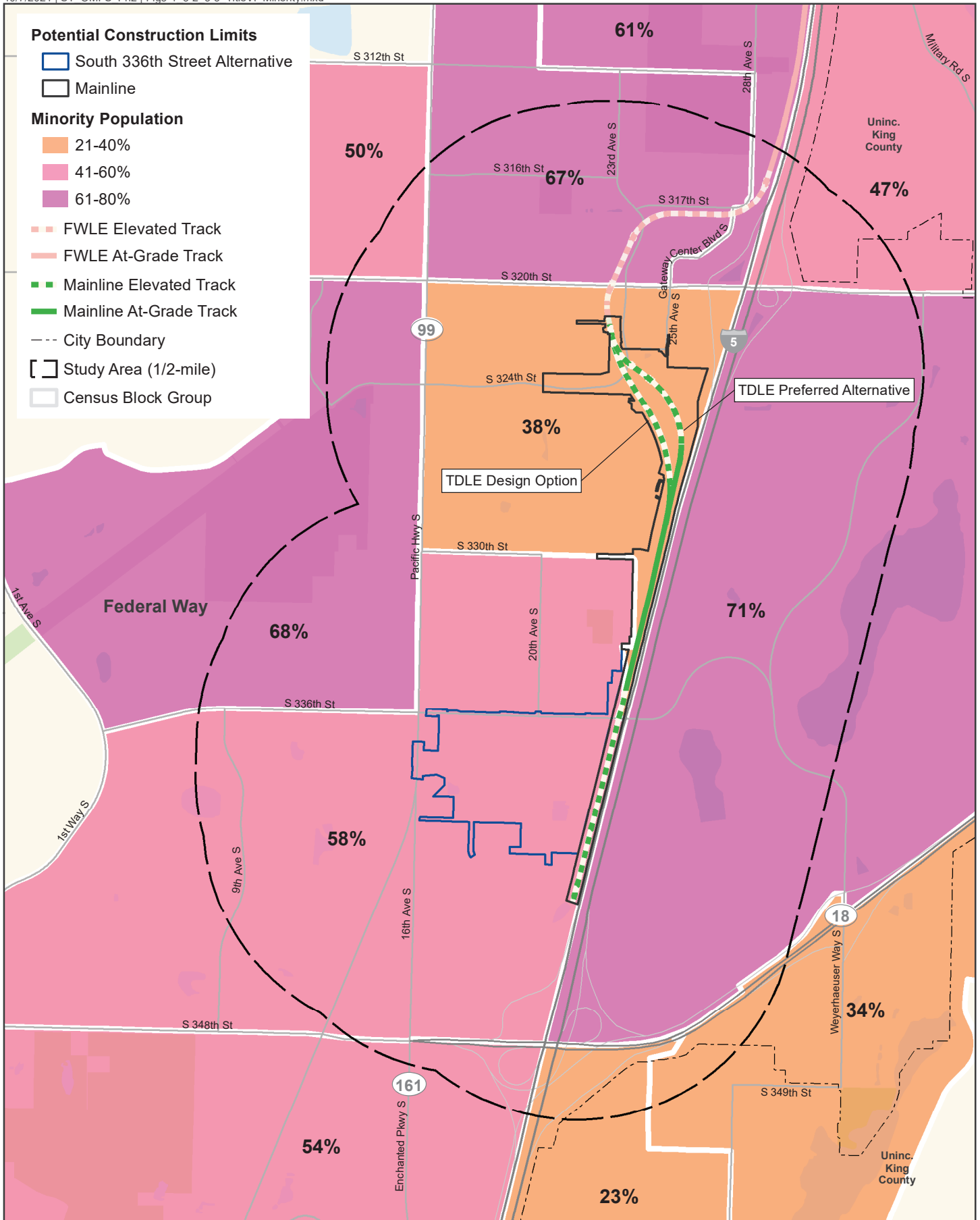
The study area for the South 344th Street Alternative in Federal Way includes the lowest proportion of minority residents as compared with the other two alternatives: 9,336 persons, or 57 percent. As with the other build alternatives, this proportion is larger than the 39 percent minority population for the Sound Transit District as a whole and the 53 percent minority population for the South Corridor. Figure 3-3 depicts the proportion of minority population, by block group, for the South 344th Street Alternative.

### 3.1.4 Demographic Conclusions

All build alternatives are located within areas that have proportions of minority populations (ranging from 57 to 65 percent minority) that are substantively higher than the proportion of minority populations present in the Sound Transit District as a whole (39 percent minority). The absolute percentage difference ranges from 18 to 26 percentage points higher for the build alternatives compared to the Sound Transit District.

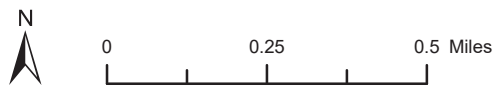
As noted in Section 1.3, the definition of a disparate impact is one that “occurs when the minority percentage of the population adversely affected by a facility location is greater than the average minority percentage of the population of Sound Transit’s service area.” Thus, each of the alternative locations has the potential to cause a disparate impact because all three sites meet the threshold requirement of having a minority population above the Sound Transit district average.

Because all alternative locations have minority populations above the Sound Transit district average, all three sites will be evaluated under “test two” set out in Section 1.3. The following sections consider whether the balance between impacts (or burdens) and benefits from construction and operation of the OMF South facility would result in overall adverse effects to the affected population.

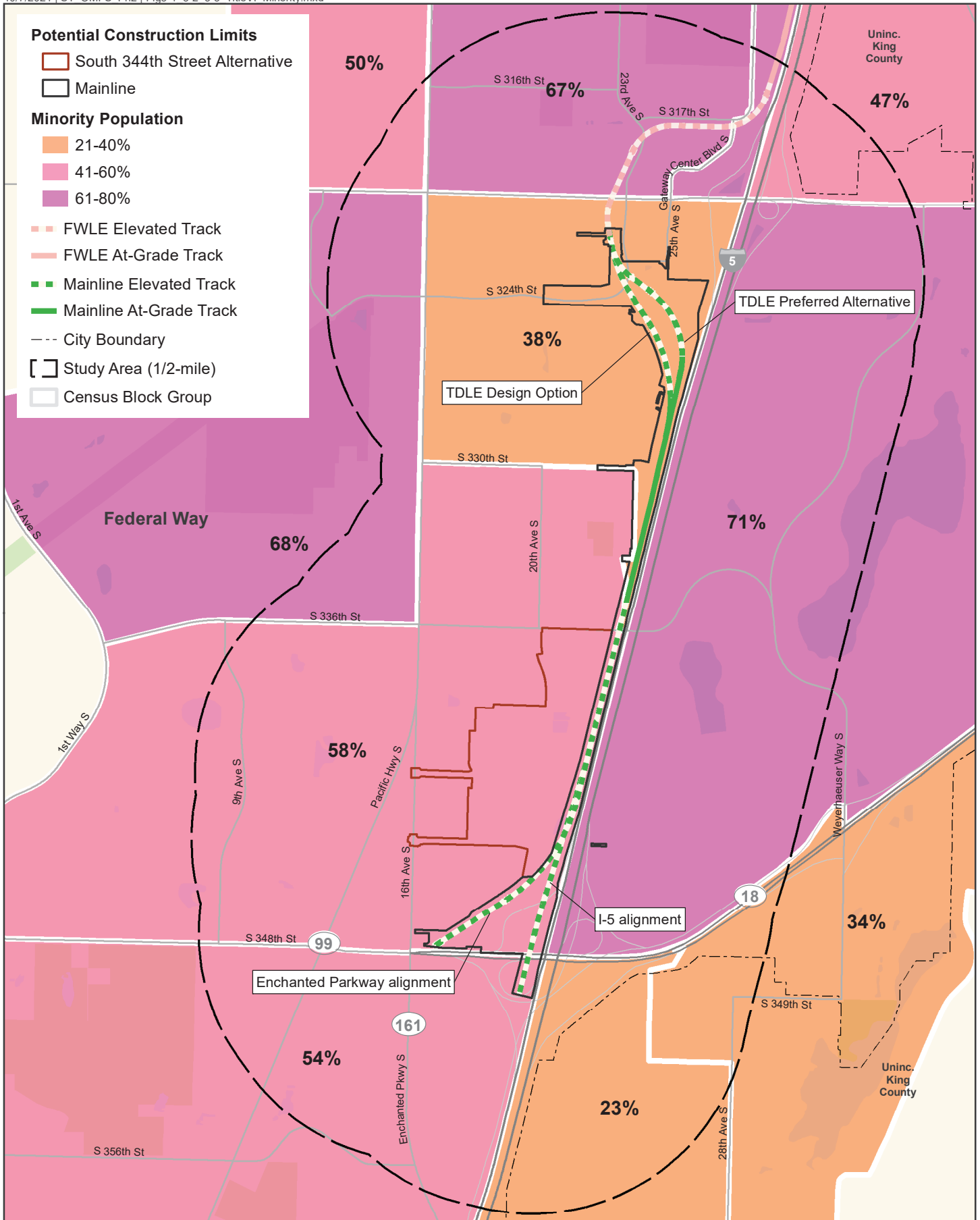


Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2019); U.S. Census Bureau ACS (2019).

**FIGURE 3-2**  
 Minority Population Distribution  
 South 336th Street Alternative

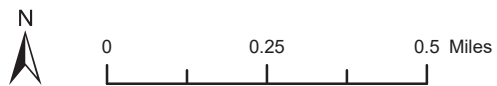






Data Sources: King County; Cities of Des Moines, Federal Way, Kent (2019); U.S. Census Bureau ACS (2019).

**FIGURE 3-3**  
 Minority Population Distribution  
 South 344th Street Alternative



## 3.2 Summary of Impacts and Benefits

To analyze impacts, potential direct, indirect, and cumulative impacts from the OMF South Draft EIS were reviewed. This section provides a summary of impacts and benefits from the build alternatives. The impacts and benefits are further discussed in Section 3.3, the Disparate Impacts Analysis.

### 3.2.1 Project Impacts

The OMF South Draft EIS disclosed detailed potential impacts associated with each of the build alternatives compared to the impacts associated with the No-Build Alternative. A summary of potential impacts for each build alternative is presented in Table 3-2. This summary includes both potential direct and indirect impacts as well as cumulative impacts, and it focuses on impacts that differ between alternatives and have potential to affect minority populations disproportionately before mitigation and consideration of offsetting benefits.

Project actions that are unlikely to have impacts on minority populations or that are similar between all alternatives are not included in this table. Table 3-2 also depicts the comparative intensity of each impact (before mitigation and consideration of offsetting benefits) between alternatives, using a color scale, as shown below. Dark blue indicates an alternative with more impacts compared to other alternatives, light blue indicates moderate impacts, and white indicates less impacts compared to other alternatives.

The impacts listed for the South 336th Street Alternative and the South 344th Street Alternative include those associated with building the mainline connection south from the existing terminus of FWLE. The current construction schedules would have construction of OMF South beginning in 2024, with operations beginning as early as 2029. This schedule precedes the TDLE construction schedule, which is currently anticipated to begin in 2026, with light rail service beginning as early as 2032. Thus, impacts associated with the extension of the mainline tracks would occur approximately 2 years earlier if either the South 336th Street or South 344th Street alternative is selected for the OMF South location; however, it is important to note that TDLE construction activity would continue until at least 2030.

Also provided for reference are the population size and proportion of minority populations in the vicinity of each project site, in the South Corridor, and for the Sound Transit District.

**Table 3-2 Equity Impact Comparison For Alternative Sites**

<b>Table Key</b>	Less Impacts	Moderate Impacts	More Impacts
------------------	--------------	------------------	--------------

Impact Type	Midway Landfill	South 336th Street	South 344th Street
<p><i>Sound Transit District: Population: 3,158,800 Minority Population: 39%</i></p> <p><i>South Corridor: Population: 188,276 Minority Population: 53%</i></p>	<p>Total Population 9,567</p> <p>Minority Population: 65%</p>	<p>Total Population: 7,973</p> <p>Minority Population: 61%</p>	<p>Total Population: 9,336</p> <p>Minority Population: 57%</p>
<p>Transportation Impacts</p>	<p><b>More Impacts</b></p> <p>All the build alternatives would require demolition activities and earthwork that would generate truck trips during the construction effort; however, the Midway Landfill Alternative could require up to 564 round trip truck trips per day during site preparation, which could last over 5.5 years (note that yearly duration does not include activities during the months of October through April).</p> <p>The substantial number of daily truck trips over several years necessary for the subsurface construction design options (particularly the Hybrid and Full Excavation options) could exacerbate existing congestion in some locations, as well as noise and visual impacts, and could be perceived by the community as a negative impact.</p> <p>Operational impacts include level of service (LOS) reduction at the S 246th Street/SR 99 intersection, which would require mitigation.</p>	<p><b>Less Impacts</b></p> <p>All the build alternatives would require demolition activities and earthwork that would generate truck trips during the construction effort. However, fewer than 80 truck trips per day are expected during construction.</p>	<p><b>Less Impacts</b></p> <p>All the build alternatives would require demolition activities and earthwork that would generate truck trips during the construction effort. However, fewer than 80 truck trips per day are expected during construction.</p>

**Table 3-2 Equity Impact Comparison For Alternative Sites (continued)**

Impact Type	Midway Landfill	South 336th Street	South 344th Street
<p>Parcels affected, business and employee displacements, residential displacements</p>	<p><b>Less Impacts</b></p> <p>42 parcels</p> <p>4 displaced businesses</p> <p>43 employee displacements</p> <p>0 displaced residences</p>	<p><b>Moderate Impacts</b></p> <p><b>With TDLE Preferred Alternative</b></p> <p>36 parcels</p> <p>2 displaced businesses</p> <p>94 employee displacements</p> <p>61 displaced residences (including 47 residences at Belmor due to mainline tracks<sup>1</sup>)</p> <p><b>With TDLE Design Option</b></p> <p>36 parcels</p> <p>2 displaced businesses</p> <p>1 displaced church</p> <p>94 employee displacements</p> <p>73 displaced residences (including 59 residences at Belmor due to mainline tracks<sup>1</sup>)</p>	<p><b>More Impacts</b></p> <p><b>With TDLE Preferred Alternative</b></p> <p>65 parcels</p> <p>12 displaced businesses</p> <p>248 employee displacements (including 1 displaced business due to mainline tracks<sup>1</sup>)</p> <p>67 displaced residences (including 47 residences at Belmor due to mainline tracks<sup>1</sup>)</p> <p><b>With TDLE Design Option</b></p> <p>65 parcels</p> <p>12 displaced businesses (including 1 displaced business due to mainline tracks<sup>1</sup>)</p> <p>3 displaced churches</p> <p>248 employee displacements</p> <p>79 displaced residences (including 59 residences at Belmor due to mainline tracks<sup>1</sup>)</p>
<p>Community and social resource impacts</p>	<p><b>Less Impacts</b></p> <p>There would be no long-term impacts to social resources or community facilities within the Midway Landfill Alternative study area.</p>	<p><b>Moderate Impacts</b></p> <p>The South 336th Street Alternative would displace residential units within Belmor, disrupting social cohesion, and would result in negative impacts to social resources, including displacing the Christian Faith Center and the Pacific Christian Academy. In addition, community resources in proximity to the alternative would experience indirect impacts to visual resources, and indirect impacts from noise and vibration.</p>	<p><b>More Impacts</b></p> <p>The South 344th Street Alternative would have the same impacts as the South 336th Street Alternative on Belmor and would result in displacement of the CrossLife Community Church, Family Life Community Church, and Voice of Hope Church. In addition, community resources in proximity to the alternative would experience indirect impacts to visual resources, and indirect impacts from noise and vibration.</p>

**Table 3-2 Equity Impact Comparison For Alternative Sites (continued)**

Impact Type	Midway Landfill	South 336th Street	South 344th Street
Hazardous materials	<p><b>More Impacts</b></p> <p>Construction impacts of the Midway Landfill Alternative would include the removal of the protective landfill cap and could include the potential release of contaminated air, soil, and groundwater due to its characterization as a high-risk hazardous materials site. Trucks hauling contaminated material from the site to disposal facilities could introduce additional risk of exposure to hazardous materials. These risks are in addition to those incurred via standard construction impacts present at all sites.</p>	<p><b>Less Impacts</b></p> <p>No differentiating impacts for this alternative.</p>	<p><b>Less Impacts</b></p> <p>No differentiating impacts for this alternative.</p>
Cumulative impacts from other similar facilities nearby (includes storage, maintenance, operations, etc.)	<p><b>Moderate Impacts</b></p> <p>There are no other facilities in proximity that are similar size and operational configuration of the OMF South; however, the following smaller facilities are in proximity and may potentially contribute to overall cumulative impacts due to increases in traffic congestion and noise:</p> <ul style="list-style-type: none"> <li>• NW Vehicle Storage</li> <li>• Ryder Truck Rentals</li> <li>• Pacific Fleet &amp; Lease Sales</li> <li>• Kent Supreme Self Storage</li> <li>• TEC Equipment</li> <li>• Kent Armory (Washington Army National Guard)</li> <li>• Public Storage</li> <li>• Allison Marine Service</li> <li>• Alpha Lion Trucking</li> </ul>	<p><b>Moderate Impacts</b></p> <p>There are no other facilities in proximity that are similar size and operational configuration of the OMF South; however, the following smaller facilities are in proximity and may potentially contribute to overall cumulative impacts due to increases in traffic congestion, noise, and changes to roadway network and access:</p> <ul style="list-style-type: none"> <li>• Public Storage</li> <li>• Storage Star</li> <li>• Spectrum Business Park (includes multiple auto repair shops)</li> <li>• Valmet Service Center</li> <li>• Olympic Moving &amp; Storage</li> <li>• USPS Distribution Center</li> </ul>	<p><b>Moderate Impacts</b></p> <p>There are no other facilities in proximity that are similar size and operational configuration of the OMF South; however, the following smaller facilities are in proximity and may potentially contribute to overall cumulative impacts due to increases in traffic congestion, noise, and changes to roadway network and access:</p> <ul style="list-style-type: none"> <li>• Public Storage</li> <li>• Storage Star</li> <li>• Spectrum Business Park (includes multiple auto repair shops)</li> <li>• Valmet Service Center</li> <li>• Olympic Moving &amp; Storage</li> <li>• USPS Distribution Center</li> </ul>

Notes:

(1) The displacements associated with the mainline are included in this table because a track connection would be required to reach the South 336th Street and South 344th Street alternatives from the terminus of FWLE at the Federal Way Transit Center. The mainline through Federal Way is planned to be constructed as a part of TDLE and therefore would be built regardless of which OMF South alternative is selected. These impacts are also disclosed in the TDLE Draft EIS.

### 3.2.2 Project Benefits

In addition to impacts described above, project benefits are expected to accrue as a result of OMF South and would be similar in nature for all build alternative sites. OMF South would support the system-wide expansion of light rail as called for in Sound Transit 3, including expansion into the South Corridor from Federal Way to Tacoma. This would, in turn, improve regional connectivity and mobility and provide a reliable means of transportation. While all populations within Sound Transit's service area would realize these benefits, they could accrue to a higher degree for minority residents as a primary means of transportation given the higher percentage of minority population within Sound Transit's South Corridor.

The community around the Midway Landfill site would realize the benefits from improved light rail service sooner than the community around the southern sites, and regardless of whether OMF South is constructed; this is because they are already in proximity to a future FWLE light rail station, with an anticipated opening date in 2024. If the Midway Landfill Alternative were selected, the cleanup of the Midway Landfill site to meet regulatory standards for development would be an improvement to existing conditions in the area in the long term because it would remove buried, but stable, contaminated materials and replace the vacant, closed landfill site with a new use and employment opportunities.

The communities around the South 336th Street and South 344th Street alternatives would benefit from the future TDLE, with an anticipated opening date of 2032. However, the expansion of Link light rail at planned service levels in the South Corridor is reliant on the completion of OMF South.

Additional benefits to all populations, including minority populations, would accrue through the addition of between approximately 5,100 and 6,800 job years<sup>2</sup> to construct OMF South and approximately 480 jobs to operate the facility. Further, increased purchases and sales generated by construction within the community, and purchases of food and goods by construction workers and OMF South employees, would benefit local businesses.

### 3.2.3 Summary of Project Burdens and Benefits

Table 3-3 summarizes the project burdens and benefits for each of the three OMF South Alternatives, with a focus on the impacts that are differentiators between the alternatives.

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<sup>2</sup> A job year is defined as full-time employment for one person over the course of a year (assuming 2,080 hours of employment per year).

**Table 3-3 Summary of Project Burdens and Benefits**

	Midway Landfill Alternative	South 336th Street Alternative	South 344th Street Alternative
Summary of Impacts	<p>Short term:</p> <ul style="list-style-type: none"> <li>Substantial truck traffic during construction, exacerbating congestion during peak travel times</li> <li>Potential exposure to hazardous materials during removal and transport of fill materials</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>Displacement of 4 businesses and estimated 43 employees</li> <li>LOS impact at S 246th Street/SR 99 intersection</li> </ul>	<p>Long term:</p> <ul style="list-style-type: none"> <li>OMF site displacement of 14 residences; mainline displacement of up to 59 residences<sup>1</sup></li> <li>OMF site displacement of 2 businesses and estimated 94 employees</li> <li>Displacement of 1 church and associated school and daycare center</li> </ul>	<p>Long term:</p> <ul style="list-style-type: none"> <li>OMF site displacement of 20 residences; mainline displacement of up to 59 residences<sup>1</sup></li> <li>OMF site displacement of 11 businesses and estimated 217 employees; mainline displacement of 1 business and estimated 31 employees<sup>1</sup></li> <li>Displacement of 3 churches</li> </ul>
Impacts after Mitigation	<ul style="list-style-type: none"> <li>Measures to manage construction traffic could reduce congestions but extend construction duration</li> <li>Risk of hazardous material exposure would be reduced</li> <li>Business displacements will be mitigated through relocation assistance</li> <li>S 246th/SR 99 intersection can be reconfigured to avoid LOS impacts</li> </ul>	<ul style="list-style-type: none"> <li>Residential and business displacements will be mitigated through relocation assistance</li> </ul>	<ul style="list-style-type: none"> <li>Residential and business displacements will be mitigated through relocation assistance</li> </ul>
Summary of Benefits	<p>Short term:</p> <ul style="list-style-type: none"> <li>Economic activity generated through construction activities and workers</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>Improved transit service and access to employment opportunities throughout Link system</li> <li>Landfill site remediated</li> <li>Anticipated to result in approximately 476 jobs at the OMF site</li> <li>Economic activity generated by OMF South employees</li> </ul>	<p>Short term:</p> <ul style="list-style-type: none"> <li>Economic activity generated through construction activities and workers</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>Improved transit service and access to employment opportunities throughout Link system</li> <li>Anticipated to result in approximately 476 jobs at the OMF site</li> <li>Economic activity generated by OMF South employees</li> </ul>	<p>Short term:</p> <ul style="list-style-type: none"> <li>Economic activity generated through construction activities and workers</li> </ul> <p>Long term:</p> <ul style="list-style-type: none"> <li>Improved transit service and access to employment opportunities throughout Link system</li> <li>Anticipated to result in approximately 476 jobs at the OMF site</li> <li>Economic activity generated by OMF South employees</li> </ul>

Notes:

(1) The mainline is the principal track that connects stations and OMFs. The mainline in Federal Way is planned to be constructed as a part of TDLE and, therefore, would be built regardless of which OMF South alternative is selected.

## 3.3 Disparate Impacts Analysis

### 3.3.1 Midway Landfill Alternative

As summarized in Table 3-2, the Midway Landfill Alternative has potential for more direct and indirect costs due to construction, particularly related to construction duration, transportation, and hazardous materials concerns, compared to the South 336th Street and South 344th Street alternatives. This alternative has fewer potential impacts from displacements and relocations and impacts to community and ecological resources compared to the South 336th Street and South 344th Street alternatives (see Figure 3-4). These costs are balanced by the benefits to the system as a whole; any of the OMF alternatives would facilitate planned service levels, providing overall benefits to transit users. Section 3.2.2 discusses the benefits to transit that OMF South provides.

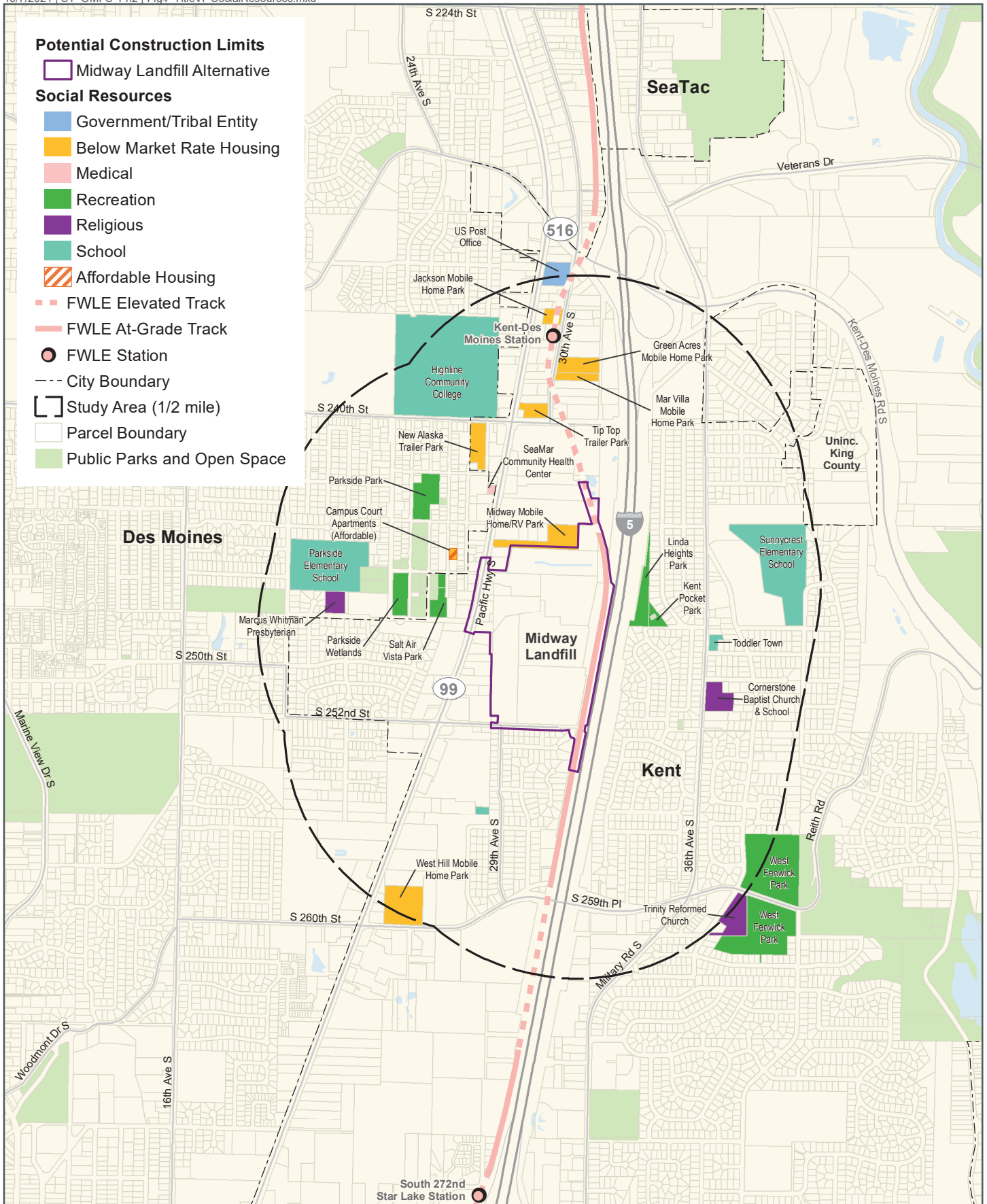
While there would be a high volume of truck trips for a longer period of time associated with the construction of the Midway Landfill Alternative, the truck haul routes would be along major arterials and highways, such as SR 99 and I-5, and not on local streets and, for the most part, would represent a low percentage of overall traffic, with some exceptions on freeway on/off ramps. Transportation impacts would be temporary, seasonal, and best management practices are proposed to mitigate associated air quality and noise impacts. Possible mitigation for truck traffic impacts could include short acceleration and deceleration lanes to accommodate inbound trucks, limiting truck activity during the peak traffic hours (which could extend the construction duration), or providing a direct connection to the I-5 corridor from the construction site (which would require approval by the Washington State Department of Transportation and the Federal Highway Administration). As the arterials and highways surrounding the Midway Landfill are used as regional transportation facilities, any remaining transportation impacts after mitigation would impact all populations as a whole, and would not disproportionately impact minority populations.

Depending on the construction design option chosen, there would be varying amounts of hazardous materials removed from the Midway Landfill. However, as described above, construction would require the removal of the protective landfill cap and modification of the landfill's methane gas monitoring and extraction systems. To account for potential impacts due to hazardous materials concerns, the landfill cap would be replaced over any remaining portions of the landfill to prevent surface water and stormwater infiltration, and the landfill gas and extraction systems would be replaced or upgraded as needed. After construction, no adverse effects related to hazardous materials are anticipated.

There is moderate potential for cumulative impacts due to the location of smaller, yet similar, facilities in proximity to the proposed site as a result of increased traffic congestion and noise, such as public storage and truck rental facilities. (see Table 3-2 and Figure 3-5). The potential for cumulative impacts is similar at all sites and based on the smaller size of these other facilities, it is likely these impacts would be minimal.

The Midway Landfill Alternative would not result in disparate impacts as defined in Section 1.3, Definitions and Methodology. There is a higher percentage of minority population in the vicinity of the site than in the Sound Transit Service District as a whole, and there would be localized impacts. However, there would be mitigation for impacts, as summarized above, and overall, the improvement in transit service in the South Corridor would compensate for the impacts and result in benefits for the community as a whole.





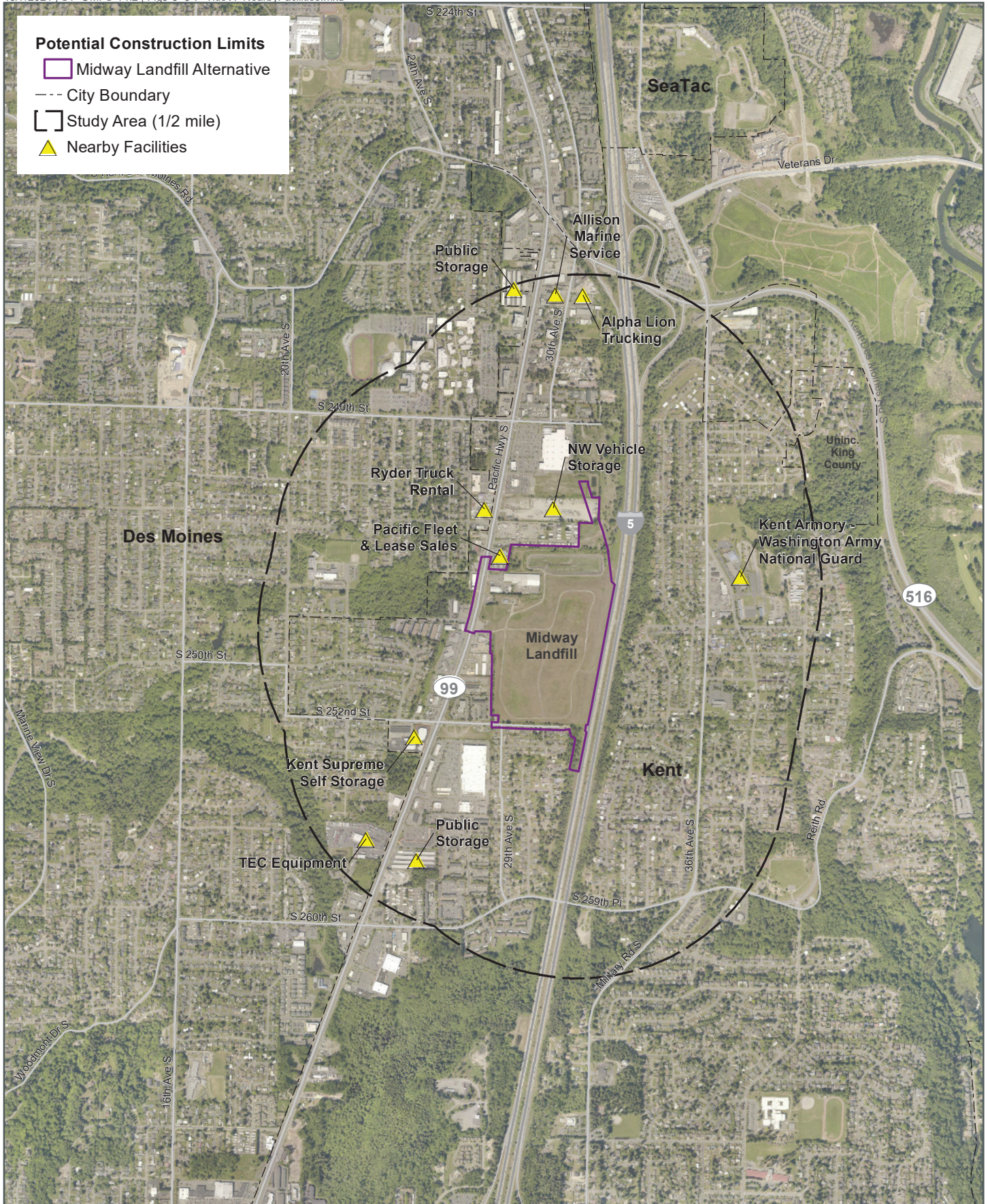
Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2019).

**FIGURE 3-4**  
Businesses, Residences, and Public Services  
Midway Landfill Alternative

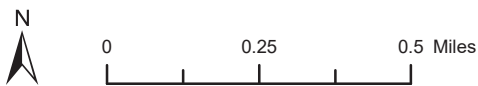
OMF South



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Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2019).



**FIGURE 3-5**  
**Location of Nearby Facilities**  
**Midway Landfill Alternative**  
*OMF South*

### 3.3.2 South 336th Street Alternative

The South 336th Street Alternative has potential impacts due to displacements and relocations and impacts to social and community resources (see Figure 3-6). These impacts rank as “moderate” compared to Midway Landfill Alternative and South 344th Street Alternative. The South 336th Street Alternative has fewer impacts for transportation and hazardous materials compared to the Midway Landfill Alternative. These costs are balanced by the benefits to the system as a whole; any of the OMF alternatives would facilitate planned service levels, providing overall benefits to transit users. Section 3.2.2 discusses the benefits to transit that OMF South provides.

To mitigate for the potential impacts due to displacements and relocations, residents and businesses displaced by the project would receive compensation and relocation assistance in accordance with federal and state relocation requirements as well as Sound Transit’s Real Property Acquisition and Relocation Policy, Procedures, and Guidelines (Sound Transit 2017) as described in detail in the Draft EIS. There are opportunities for relocation of residents and businesses in the project vicinity, including relocation opportunities for those residents of impacted mobile home parks and social resource facilities. For residential relocations, Sound Transit would work with those affected to try to keep them in the same general area, if desired. This includes identifying replacement housing that considers such factors as proximity to commercial and community facilities, schools (if applicable), an individual’s place of employment, and accessibility to transit.

In general, properties acquired are in areas where minority populations reside, work, and congregate. Individuals from these populations are likely to be affected; however, negative impacts are likely to be the same as for the general population in the affected neighborhoods.

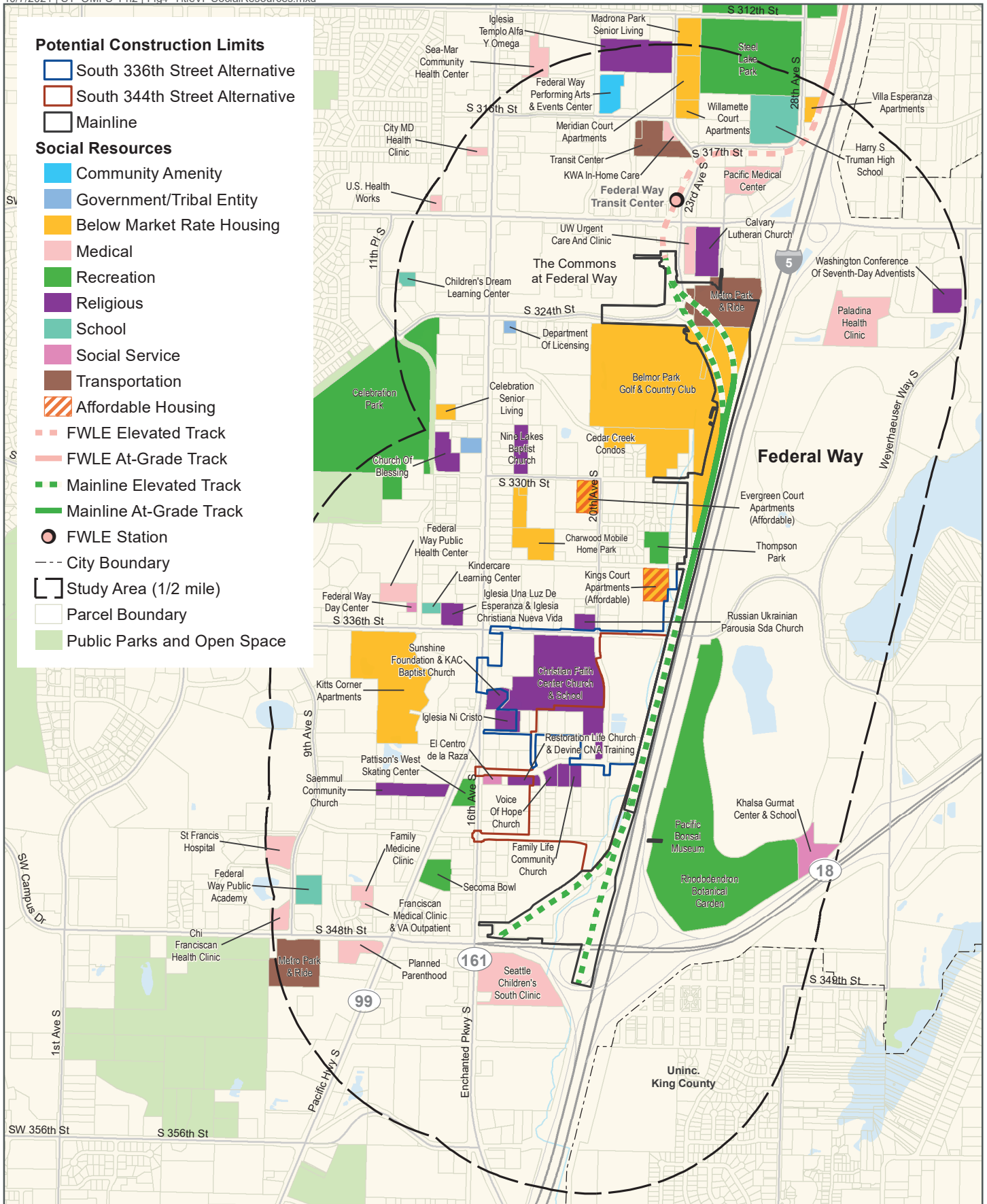
Similar to Midway Landfill Alternative, there is moderate potential for cumulative impacts due to the location of similar facilities in proximity to the proposed site as a result of increased congestion, noise, and access limitations (see Figure 3-7). The potential for cumulative impacts is similar at all sites and based on the smaller size of these other facilities, it is likely these impacts would be minimal.

The South 336th Street Alternative would not result in disparate impacts as defined in Section 1.3, Definitions and Methodology. There is a higher percentage of minority population in the vicinity of the site than in the Sound Transit Service District as a whole, and there would be localized negative impacts. However, there would be mitigation for negative impacts, as summarized above, and overall, the improvement in transit service in the South Corridor would compensate for the negative impacts and result in benefits for the community as a whole.

### 3.3.3 South 344th Street Alternative

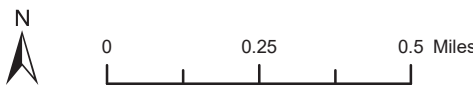
Similar to the South 336th Street Alternative, the South 344th Street Alternative has potential impacts due to displacements and relocations and impacts to social and community resources (see Figure 3-6). However, due to the greater number of resources affected, including business, residences, and social/community resources, these impacts rank as “higher” compared to the Midway Landfill Alternative and South 336th Street Alternative. These costs are balanced by the benefits to the system as a whole; any of the OMF alternatives would facilitate planned service levels, providing overall benefits to transit users. Section 3.2.2 discusses the benefits to transit that OMF South provides.

Mitigation for these potential impacts would be the same as described for the South 336th Street Alternative.

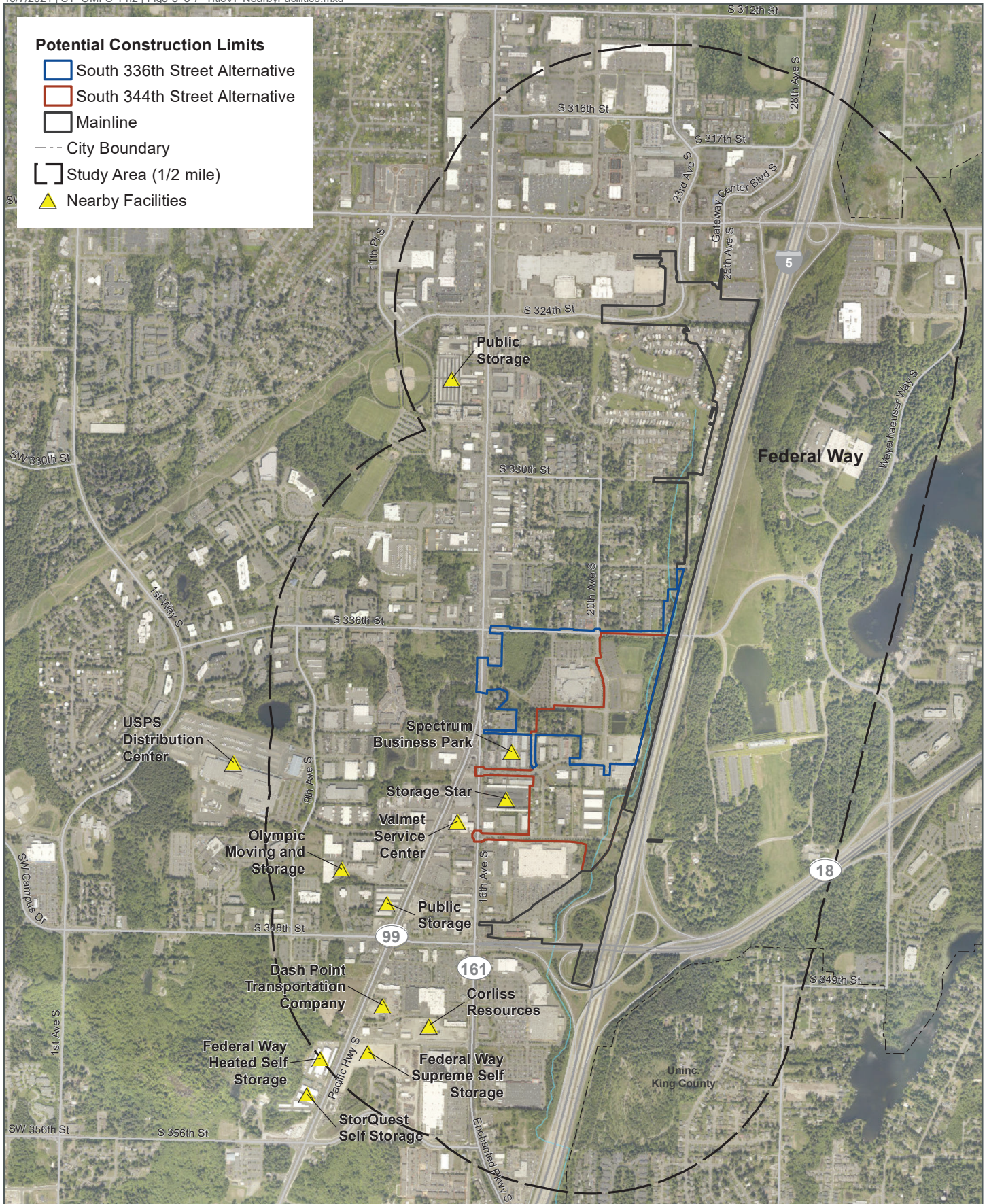


Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2019).

**FIGURE 3-6**  
 Businesses, Residences, and Public Services  
 South 336th Street and South 344th Street Alternatives



OMF South



Data Sources: King and Pierce County, Cities of Federal Way, Fife, Milton, Tacoma (2019).

**FIGURE 3-7**  
 Location of Nearby Facilities  
 South 336th Street and South 344th Street Alternatives

OMF South



Similar to the other sites, there is moderate potential for cumulative impacts due to the location of similar facilities in proximity to the proposed site as a result of increased congestion, noise, and access limitations (see Figure 3-7). The potential for cumulative impacts is similar at all sites and based on the smaller size of these other facilities, it is likely these impacts would be minimal.

The South 344th Street Alternative would not result in disparate impacts as defined in Section 1.3, Definitions and Methodology. There is a higher percentage of minority population in the vicinity of the site than in the Sound Transit Service District as a whole, and there would be localized negative impacts. However, there would be mitigation for negative impacts, as summarized above, and overall, the improvement in transit service in the South Corridor would compensate for the negative impacts and result in benefits for the community as a whole.

### **3.3.4 No-Build Alternative**

Under the No-Build Alternative, no impacts from construction and operation of OMF South would occur; however, benefits to minority populations in the surrounding community would be limited. The OMF South facility provides maintenance facilities required to support the full-service levels of FWLE and Sound Transit 3. Under the No-Build Alternative, there would be no disparate impacts; however, the full operational capacity of the Link system would not be realized, and it would therefore provide limited benefits to minority populations due to reduced transit service levels.

## 4 OUTREACH

This section summarizes public outreach conducted throughout project development. More information can be found in the Draft EIS and the Draft EIS Public Engagement Summary prepared for the OMF South Project (Sound Transit 2021).

### 4.1 General Outreach

Public outreach was performed from the early scoping stages through the Draft EIS for this project. This section provides a high-level overview of each phase of effort (early scoping, SEPA scoping, Draft EIS development, and Draft EIS public comment period) and also describes targeted outreach effort. Public outreach featured a variety of notification methods and forums for providing feedback. Additional detail of public outreach efforts is described in the OMF South Draft EIS Appendix B, Public Involvement and Agency Coordination.

In early 2018, Sound Transit conducted early scoping concurrently with the TDLE project. The early scoping notice was published in the Washington State Department of Ecology SEPA Register on March 28, 2018, and the comment period occurred from April 2 to May 3, 2018. Sound Transit asked members of the public to comment on the route (alignment), stations, potential alternatives, benefits, and impacts for TDLE; the potential location, benefits, and impacts for an OMF in the South Corridor (South King and Pierce counties); and the purpose and need for the project. Most of the comments that Sound Transit received were related to TDLE and not OMF South.

Sound Transit initiated the formal SEPA scoping process by splitting the OMF South environmental review from the TDLE process. Sound Transit published the Determination of Significance/Scoping Notice in the SEPA Register on February 19, 2019. The comment period for scoping was from February 19 to April 1, 2019. During scoping, Sound Transit asked for comments on the proposed range of alternatives, the purpose and need for the project, the environmental effects and benefits to be analyzed, the probable significant adverse impacts, mitigation measures, and license or other approvals that may be required. Generally, public, agency, and tribal comments focused on potential business displacements and other economic impacts, impacts to future transit-oriented development opportunities in Kent, and potential impacts to Hylebos Creek and its associated wetlands in Federal Way.

During the Draft EIS development phase, in November and December 2019, Sound Transit held a series of public drop-in sessions in Kent and Federal Way to provide the public opportunities to learn more about both TDLE and OMF South. There was also an online open house available from November 13 through December 6, 2019. The site provided a project update on the three sites to be studied in environmental review and laid out the timeline for the project as well as the next opportunity for the public to provide comments and feedback. These were primarily opportunities for information sharing. Commenters primarily had questions about Sound Transit's property acquisition process and timeline and how the recent passage of I-976 could affect the project. Commenters who expressed a site preference generally encouraged Sound Transit to choose the Midway Landfill Alternative.

The extended 45-day public comment period for the OMF South Draft EIS was from March 5 to April 19, 2021. Two online hearings were held for the public during this period, on March 24 and March 30. Translation assistance was available in Spanish, Korean, and Russian for the March 24 meeting and in Spanish and Russian for the March 30 meeting. 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. The majority of comments had to do with site preference, and generally encouraged Sound Transit to choose the Midway Landfill Alternative due to the displacement of residents, businesses, and employees with the South 336th Street and South 344th Street alternatives.

## 4.2 Targeted Outreach

Sound Transit is committed to equitable engagement and inclusive outreach towards community groups, organizations, residents, businesses, and underrepresented populations who do not typically participate in traditional in-person and online open houses or engagement opportunities. The project team conducted targeted outreach to low-income, minority, and limited-English-proficiency populations to build long-term relationships and provide meaningful and accessible opportunities to engage in the project planning, design, and environmental review processes. The project team reached out to community organizations and social service providers, when possible, to learn more about individual community needs and events to attend.

Sound Transit conducted a preliminary demographic analysis to identify low-income, minority, and limited-English-proficiency populations in the project area. Based on this analysis, Sound Transit provided project literature in Spanish, Korean, Vietnamese, Khmer, and Russian.

Sound Transit engages with social service providers, community leaders and organizations, and other representatives through targeted outreach efforts. Through these efforts, the project team can share project information, build relationships with the community, and understand how low-income and minority populations may experience adverse impacts or benefits from the project. Sound Transit is using several types of targeted outreach, including:

- **Briefings:** Sound Transit met with representatives of individual communities or organizations to provide a project update, answer questions, and learn more about individual circumstances and better ways to engage with community. Attention and care were taken to meet people in locations where they may be more comfortable to engage with government agencies. This has included presence with in-language lunch groups (Korean, Spanish, and Cambodian) and collaboration with groups for translation services. Briefings were adapted to meet the needs of specific audiences, including presentation content.
- **Open houses:** Sound Transit chose locations and times that were accessible for the audiences within the project corridor. At open houses, project outreach staff set up tables of materials and resources, answered questions, and participated in facilitated conversations. At TDLE-focused open houses, project staff often presented a brief overview of the project to provide background. Availability for translation, American Sign Language interpretation, and tactile interpretation was advertised by Sound Transit and used by individuals who requested these services. Meetings for the Draft EIS were offered in a virtual format due to COVID-19 restrictions on meeting in person.
- **Fair or festival booths:** Project staff attended fairs, festivals, and community/cultural celebrations in the project area (Kent and Federal Way) to distribute project information and answer questions from the general public. Outreach staff hosted a Sound Transit booth with project-specific materials and general South Puget Sound materials. Booths were open to the public and provided basic information, as well as a chance to discuss specific questions in detail.



- **Tabling and drop-in sessions:** Project outreach provided project information and updates and answered questions at community spaces, including transit centers, University of Washington Tacoma, grocery stores, and community centers to reach a wider audience. These tabling sessions were held at multiple days and times (weekdays/weekends, daytime, and evening) to meet varying schedules of community members. Events were open to the public and provided basic information as well as a chance to discuss specific questions in detail.
- **Stakeholder interviews:** The project team conducted a series of interviews with social service organizations and community advocacy groups in the project area to understand their preferred methods of engagement, establish relationships, and introduce them to the OMF South project.
- **Property owner meetings:** Project staff met with property owners along the project corridor to discuss specific questions and concerns; some with language interpretation.
- **Outreach toolkits:** The project team distributed outreach toolkits to social service organizations along the project corridor to encourage sharing of information by trusted leaders with their audiences during outreach periods and to generate additional feedback. The toolkits included project emails, posters, factsheets, Facebook posts, and tweets for organizations to post and share.
- **Door-to-door outreach:** Project staff distributed posters and fliers to share project information, advertise upcoming events, and solicit project feedback. This often included outreach to small businesses and property owners in the project areas, particularly those likely to be affected by future alignments or stations.

Through these efforts, Sound Transit has been able to engage with various audiences and involve people representative of the project corridor. There have been consistent demographics represented in open houses and comment periods. The targeted outreach efforts and engagement dedicated towards historically underrepresented groups and underserved populations through the strategies outlined above has been vital to build connections and gather project related feedback from these communities. Meetings and outreach conducted since March 2020 have been held virtually due to the ongoing restrictions related to the COVID-19 pandemic. Sound Transit anticipates that outreach efforts will continue virtually through the pandemic.

## 5 CONCLUSION

As presented in Section 1.3, Definitions and Methodology, a disparate impact occurs when the minority percentage of the population adversely affected by a facility location is greater than the average minority percentage of the population of Sound Transit's service area. A facility location creates an adverse effect when both direct costs, such as residential and business displacements, and indirect costs, such as construction impacts and public health risks, are greater than the benefits to the surrounding community associated with the proposed facility location. The measurement of the costs and benefits of the facility location alternatives may include quantitative data and qualitative inputs from potentially impacted communities.

The site alternative equity analysis is based on the findings of two “tests,” per the FTA Circular (FTA C 4702.1B). Each site is analyzed using the following two-step process:

1. The population within the vicinity of each build alternative is analyzed and compared to the Sound Transit District as a whole to identify whether higher than average minority populations are present.
2. Potential disproportionate direct and indirect impacts to minority populations are described, with the consideration of mitigation and offsetting benefits.

Based on the application of these tests, OMF South would not result in disparate impacts to the communities around the Midway Landfill, South 336th Street, or South 344th Street alternatives. Within the vicinity of each of the OMF South alternatives, there is a higher percentage of minority population than in the Sound Transit Service District as a whole, and construction of OMF South at any of the alternative sites would result in localized temporary and long-term impacts. However, there would be mitigation for the impacts as summarized in Section 3.3, Disparate Impacts Analysis, and the benefits to the surrounding communities from improved transit service in the South Corridor as a whole would compensate for and outweigh the negative impacts caused by OMF South.

Despite the localized impacts that would accrue to individuals, there is substantial legitimate justification for the development of this project specifically within the South Corridor, given the stated need to develop an OMF to facilitate not only the expansion of light rail through the South Corridor but the full operational capacity of the Link system. If this capacity were not developed, Link transit service would operate at substantially reduced service levels, and would, therefore, provide limited benefits to the South Corridor and, to some extent, throughout the system as a whole.

As stated in Sound Transit Resolution No. 2013-18:

The Sound Transit Board may approve the change unaltered and Sound Transit may proceed to implement the change “if there is a substantial legitimate justification for the change(s) and Sound Transit can demonstrate that there were no alternatives that would have less of an impact on minority or low income populations and would still accomplish Sound Transit’s legitimate program goals.”

This justification provides the Sound Transit Board with support for proceeding with any of the OMF South project alternatives. The Title VI Facility Equity Analysis concludes that the project alternatives would provide community benefits, that none of the alternatives would result in disparate impacts, and that alternative locations were selected without regard to race, color, or national origin.

## 6 REFERENCES

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