

4 CUMULATIVE EFFECTS ANALYSIS

This chapter considers the cumulative effects of OMF South and other past, present, and reasonably foreseeable future actions, regardless of what agency or party undertakes such other actions. A cumulative effects assessment can reveal unintended consequences that might not be apparent when a proposed action is evaluated in isolation. (Note: while NEPA uses the term “effects,” SEPA uses “impacts.” For the purposes of this discussion, the words have the same meaning.)

Cumulative effects are defined as “the effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative effects can result from individually minor but collectively significant actions taking place over a period of time” (40 Code of Federal Regulations 1508.1(g)(3)). Public agencies must analyze cumulative impacts to fully understand how a proposed action and its alternatives interact with past actions, present-day activities, and actions that are planned and reasonably certain to occur in the future. Studying the proposed project in conjunction with other actions can reveal unintended impacts that may not be clear when the proposed project is analyzed by itself.

Sound Transit has considered its planned projects and gathered information from agencies and the public to identify impacts of past and present developments and reasonably foreseeable future actions that could interact with the impacts of OMF South alternatives, including:

- Adopted transportation plans, land use plans, and neighborhood plans from King County, Federal Way, and Kent.
- Lists of known major public and private land use proposals in King County, Federal Way, and Kent.
- Information provided by WSDOT and King County Metro on planned transportation projects and developments.
- PSRC data on population and employment growth projections, travel forecasts, and land use projections.
- Information provided by other organizations and the public on planned private projects, community values, and concerns.

This information was used to identify past and ongoing development trends, characterize reasonably foreseeable future actions, and identify and evaluate expected cumulative impacts to which OMF South could contribute.

4.1 Temporal and Geographic Boundaries of the Cumulative Effects Analysis

Consistent with regulatory guidance for cumulative impact analyses, the development actions that were considered included those that are past, present, and reasonably foreseeable.

- Past actions include non-native settlements dating back to the 1800s through developments up to the present.
- Present actions are those projects just completed or under construction by local, state, or federal agencies.

- Reasonably foreseeable future actions are those that have obtained some local, state, or federal government approval and thus could be under construction at any time between the present and 2042 (OMF South's design year).

The study area for this cumulative impact analysis is generally a combination of the study areas defined in Chapter 3 for the various environmental resources and construction impacts or a broader area for certain elements of the environment, as described below:

- Avian species and other migratory animals or animals with large foraging areas are studied at the wildlife corridor level.
- Fish habitats are considered at the watershed level for impacts on stream quality.
- Transportation, air quality, energy, and, to some degree, economics are studied at the Puget Sound regional level, including Pierce, King, Snohomish, and Kitsap counties.
- GHGs are studied at the Puget Sound regional level, while it is acknowledged that the effects are felt globally.
- Socioeconomic resources that may experience a range of cumulative impacts from new infrastructure projects, such as land use, economics, neighborhoods, public services, visual resources, and parks, were generally analyzed within 0.25 to 1 mile of the project alternatives.

4.2 Past and Present Actions

Ongoing impacts from past actions have shaped the project vicinity since the mid-19th century. The area between Seattle and Tacoma has become increasingly urban, with suburban population growth spreading to surrounding areas, including Federal Way and Kent in the OMF South study areas. Development that has occurred next to I-5 and SR 99 has been predominantly commercial and residential, with some industrial, office, mixed-use, and agricultural uses as well.

Past and present regional and local planning efforts have emphasized an integrated, long-range growth-management, economic, and transportation strategy based on a vision of high-density, urbanized centers linked by a high-quality, multimodal transportation system that includes light rail. The environmental effects of past and ongoing actions are considered in relation to the natural and built environments.

4.2.1 Natural Environment

Much of the OMF South study area is now urbanized but originally contained forest land, wetland, streams, and riparian environments. The topography was substantially modified through urban development as well as through the construction of I-5 and SR 99, where hills were cut or regraded and valleys and lowlands filled to create the highways.

Urbanization has resulted in hydrologic changes, such as decreased baseflow and aquifer recharge during summer months and increased seasonal flow fluctuations and flooding during periods of heavy rain, as compared with predevelopment conditions. The development has also affected water quality by introducing runoff contamination from pollution-generating surfaces and by increasing water temperatures due to the removal of vegetation that previously provided shade along stream banks.

Past actions affecting the natural environment included timber harvesting, natural resource extraction, farming, ranching, and residential development. The wetlands present in the OMF South study area represent fragments of larger historical wetland systems, and some are more recently formed wetlands that have developed because of transportation, land use, and surface water drainage improvements that have altered the landscape. The Hylebos Creek basin contains the largest wetlands in the study area.

Due to the heavily developed nature of the OMF South study area, most of the vegetation present reflects landscaping practices for urban and suburban areas, with remnant tree canopy retained for shade or aesthetics. However, mature forest is within the study area along the riparian corridor of the Hylebos Creek tributaries to the west of I-5.

4.2.2 Built Environment

In the six decades since the completion of I-5 in Washington, industrial and commercial development has grown steadily in the study area. Employment encompasses a variety of industries and business sectors, including retail, food service, and light industrial. The land uses adjacent to the SR 99 and I-5 corridors are primarily commercial and residential, with some industrial, office, mixed-use, and limited amounts of open space.

4.3 Reasonably Foreseeable Future Actions

Reasonably foreseeable future actions are future projects that would produce environmental impacts that could add to or interact with the impacts associated with OMF South alternatives and other past and present actions. Reasonably foreseeable future actions are not speculative and are considered regardless of the agency, organization, or person serving as their proponent (CEQ 1997). They must be likely to occur in the reasonably foreseeable future by virtue of being funded, approved, or under consideration for regulatory permitting; being the subject of an environmental review process under NEPA or SEPA; or being part of an officially adopted planning document or publicly available development plan.

Changes to transportation infrastructure are one of the biggest influences on transportation conditions and other environmental topics, such as noise and air quality. Past, present, and reasonably foreseeable future actions are listed in Table 4.3-1 and shown on Figures 4.3-1 and 4.3-2.

Table 4.3-1 Past, Present, and Reasonably Foreseeable Future Actions

Map ID	Proponent	Actions and Projects in the Vicinity	Project Description	Planned Completion Date
1	WSDOT	SR 509 Completion Project (Part of the Puget Sound Gateway Program)	A new four-lane expressway between S 188th Street and I-5/ S 272nd Street and SR 509, also includes new I-5 ramps, improvements to I-5 interchanges in south King County and constructs new bridges. (WSDOT 2023a). These improvements are part of the Puget Sound Gateway Program, which combines this project with the SR 167 Completion Project in Pierce County to complete critical missing links in the state’s highway and freight network.	2029
2	Sound Transit	Federal Way Link Extension (FWLE)	Extends Sound Transit’s Link Light Rail from the Angle Lake Station in Sea-Tac south to the Federal Way Downtown Station. This includes three stations in Kent/Des Moines near Highline College, S 272nd Street, and the Federal Way Downtown Station. A total of 3,200 parking spaces will be added along the route. (Sound Transit 2023a)	2026

Table 4.3-1 Past, Present, and Reasonably Foreseeable Future Actions (continued)

Map ID	Proponent	Actions and Projects in the Vicinity	Project Description	Planned Completion Date
3	Private	Pape – Kenworth Development	Two buildings that will include areas for truck maintenance, showroom, office, and warehouse space (City of Federal Way 2020a).	TBD
4	Sound Transit	Tacoma Dome Link Extension (TDLE)	Extends Sound Transit’s Link light rail from the Federal Way Downtown Station to the Tacoma Dome Transit Station. Will also include new light rail stations in South Federal Way, Fife, and additional Tacoma locations. (Sound Transit 2023b)	2035
5	Federal Way	Federal Way City Center Access Project	Intended to ease congestion in Federal Way’s City Center through a number of projects which will improve access to I-5 and local street projects. This will include but not be limited to road widening and additional roundabouts, HOV lanes, and overcrossings in the City Center area. (City of Federal Way 2022)	Construction currently unfunded.
6	Private	FUSION Family Center Project	An Econo Lodge hotel in the Federal Way area was converted to a 29-room emergency shelter for families experiencing homelessness. (FUSION Federal Way 2023)	Completed December 2020
7	Private	Creekside Commons Townhomes	Approximately 10 acres will be converted to 94 townhome units. (City of Federal Way 2019a)	TBD
8	Private	Woodbridge Corporate Park (Weyerhaeuser Campus) Redevelopment	The former Weyerhaeuser Campus will be restored to a fully operational corporate park, with a focus on learning, workforce training, and economic development. Historic and natural features will be preserved during restoration. Once complete, an estimated 3,100 jobs will be created.(Industrial Realty Group 2022; Nieto 2022)	2025
9	Federal Way	Asphalt Overlay Project – S 336th Street – 10th Place S to 18th Avenue S	Various streets in Federal Way are being repaved within the 2022 Asphalt Overlay Project, including S 336th Street – 10th Place S to 18th Avenue S. Sidewalks will be improved to meet ADA requirements. (City of Federal Way 2021)	2023
10	Federal Way	Widen S 336th Street between SR 99 (Pacific Highway S) and 20th Avenue S	S 336th Street will be widened to five lanes, and second left-turn lanes will be added for eastbound and westbound SR 99. In addition, sidewalks will be added on the north side of S 336th Street. (City of Federal Way 2023)	TBD
11	Federal Way	Asphalt Overlay Project – 16th Avenue S – SR 99 to SR 18	Various streets in Federal Way are being repaved within the 2022 Asphalt Overlay Project, including 16th Avenue S – SR 99 to SR 18. In addition to repaving these streets, sidewalks will be improved in accordance with the ADA, including improvements to wheelchair ramps. (City of Federal Way 2021)	TBD
12	Federal Way	16th Avenue S: S 344th Street – S 348th Street Auxiliary Lane	A third southbound through-lane will be added at the intersection of S 348th Street and 16th Avenue S. (City of Federal Way 2020b)	2026
13	WSDOT	SR 161 – Milton Road S Vicinity to SR 18 – Paving and ADA Compliance	SR 161 was resurfaced in both directions, and ADA ramps were replaced. (WSDOT 2022)	Completed 2022
14	Federal Way	SR 99 HOV Lane Widening, S 340th Street to S 359th Street	SR 99 was widened from a five-lane section to a six-lane section, with two general-purpose lanes, and one HOV lane added in each direction. A landscaped median was added, with left-turn lanes and U-turn accessibility at intersections. (City of Federal Way 2019b)	Completed 2018
15	WSDOT	I-5/SR 16/SR 18 Triangle Interchange Vicinity Improvements	A new southbound exit will be added to S 356th Street, the existing exit for SR 18 will be replaced, and the intersection at SR 161 will be realigned with Milton Road South/20th Avenue South. (WSDOT 2023b)	Project suspended in 2023; no resumption date scheduled.

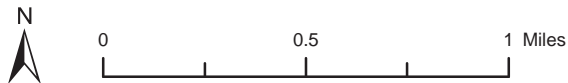
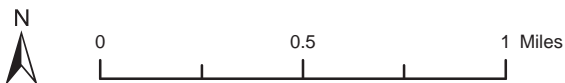


FIGURE 4.3-1
Past, Present, and Reasonably
Forseeable Future Actions



FIGURE 4.3-2
Past, Present, and Reasonably
Forseeable Future Actions



The four reasonably foreseeable future projects that would have the greatest potential for cumulative impacts with OMF South are Sound Transit's TDLE, WSDOT's SR 509 Completion Project and I-5/SR 16/SR 18 Triangle Interchange Vicinity Improvements, and the Federal Way City Center Access Project.

TDLE would extend light rail service nearly 10 miles via mostly elevated tracks between Federal Way and Tacoma. The project includes four new light rail stations in areas near south Federal Way, Fife, Portland Avenue, and the Tacoma Dome. The stations would provide connections to other transit services in the region, such as Sounder, Tacoma Link, Sound Transit Express, King County Metro, Pierce Transit, Intercity Transit, and Amtrak. Additional information is available at Sound Transit's web page focused on system expansion: <https://www.soundtransit.org/system-expansion>.

As described in Section 2.4, Project Alternatives, TDLE would be constructed and open after OMF South. Impacts associated with constructing the mainline tracks connecting the FWLE terminus to the OMF South for the Preferred or South 344th Street alternatives are addressed in the discussion of the build alternatives in Chapter 3 of this Final EIS. TDLE impacts beyond those associated with the mainline tracks are addressed in this cumulative impacts analysis chapter and will be further detailed in the separate TDLE Draft EIS, expected to be published in mid-2024. If the Midway Landfill Alternative were selected to be built, impacts associated with the mainline tracks of the Preferred and South 344th Street alternative could still occur, but later in time as part of the proposed TDLE construction and operations.

Federal Way's City Center Access Project is intended to ease traffic congestion caused by sustained growth. In November 2019, the Federal Way City Council approved moving forward on designing a modified interchange with an overcrossing at S 324th Street and extended I-5 access ramps serving S 320th Street and S 324th Street. The City Center Access Project overlaps with the northern portion of the mainline for the OMF South Preferred and South 344th Street alternatives near S 324th Street. The project is currently in preliminary design and is undergoing environmental review under NEPA; however, the project is not currently fully funded and construction dates are not known.

WSDOT's SR 509 Completion Project is part of the Puget Sound Gateway Program, which also includes the SR 167 Completion Project in Pierce County. Together, these projects help complete critical freight corridors in the Puget Sound region. The SR 509 Completion Project will build a new four-lane expressway between I-5 and SR 509's current terminus near SeaTac Airport. The project will also build new freeway ramps, improves existing freeway interchanges, and builds new bridges. Construction began in 2020 and is expected to be completed in 2028.

WSDOT's Triangle Interchange Vicinity Improvements would add a new southbound exit to South 356th Street, rebuild the existing exit to SR 18, and realign the SR 161 intersection with Milton Road South/20th Avenue S. The project was suspended in 2023, with no date for resumption scheduled.

4.4 Analysis of Cumulative Effects

Adverse and/or beneficial cumulative impacts could occur over an extended period during project operation, when impacts of OMF South would add to or interact with long-term impacts of other past actions, present actions, and reasonably foreseeable future actions. Adverse cumulative impacts could occur over the short-term during construction when activities necessary to build OMF South would accumulate with impacts from other projects under construction at the same time. The following sections discuss expected cumulative impacts of project construction and operations on elements of the environment. The direct and indirect

long-term and construction impacts of the project that could contribute to future cumulative impacts are discussed in Chapter 3.

Operation of OMF South would facilitate operation of regional light rail and contribute to a shift of some vehicle trips to light rail transit, thereby reducing demand on traffic and bus transit movement (Sound Transit 2016a). This in turn would contribute to a reduction in impacts on air quality, noise levels, water quality, and energy consumption compared with future conditions projected under the No-Build Alternative, as described in the corresponding sections below. Therefore, a contribution of OMF South would be to reduce the adverse cumulative impacts on these resources to levels below what they would be without the project.

4.4.1 Transportation

The transportation access analysis presented in Section 3.2 reflects conditions with assumed growth between existing conditions and the design year (2042). The traffic growth assumptions also reflect changes in traffic volumes that are projected in the traffic forecasts prepared for FWLE and TDLE. As a result, the traffic analyses reflect the cumulative impacts of these Link light rail extensions as well as other planned and foreseen developments and associated increases in traffic within the study areas.

FWLE is under construction and is forecasted to begin service in 2026. Design and construction for OMF South is planned from 2024 to 2037, depending on the alternative. Should OMF South be located at the Midway Landfill Alternative, the FWLE construction period may overlap the planned construction period for OMF South; however, this is unlikely as the section of FWLE adjacent to the landfill should be completed before OMF South construction is scheduled to begin. There is also the potential that the construction period for OMF South would overlap with TDLE, if the Midway Landfill Alternative is selected to be built.

Federal Way's City Center Access project would construct a new I-5 interchange at S 324th Street and improvements to the existing I-5/S 320th Street interchange. Project design continues with a planned construction start as soon as 2027. However, construction is currently unfunded. In conjunction with the City Center Access project, WSDOT is proposing to make fish passage improvements that would remove a portion of parking spaces in the Federal Way/S 320th Street Park & Ride. This work could overlap with OMF South construction. This potential impact to parking availability may be in addition to the 50 parking spaces that would be removed as part of the OMF South Preferred and South 344th Street alternatives. Because the project does not have construction funding and has not yet completed environmental review, the change in traffic patterns due to the City Center Access project were not reflected in the 2042 traffic analyses for OMF South.

In addition to the parking spaces removed by OMF South, further loss of parking spaces at The Commons at Federal Way shopping mall (from FWLE) and Walmart (from TDLE) are not expected to affect access to those properties due to the amount of remaining parking within and adjacent to those properties. Any future development in those areas would need to comply with Federal Way parking requirements.

4.4.2 Acquisitions, Displacements, and Relocations

Several other public projects planned in the vicinity of the OMF South alternatives could acquire property, most notably TDLE would acquire properties to the south of the Preferred or South 344th Street alternatives. In addition, there could also be other smaller public or private projects in the project vicinity that would acquire new properties and displace existing uses.

As part of the City Center Access project in Federal Way, transportation improvements and stream culvert work would displace Belmor residents in the vicinity of the OMF South mainline tracks for the Preferred and South 344th Street alternatives. Some of these mobile home displacements may overlap with OMF South displacements, or there may be additional displacements. Because the City Center Access project does not currently have construction funding, it is likely that OMF South would begin the acquisition and relocation process before Federal Way begins project construction. Therefore, the two projects would not have overlapping construction impacts, but may have adverse long-term cumulative impacts within Belmor, depending on the OMF South mainline track option and the final design for the City Center Access project.

There are no anticipated projects from other public agencies or private development that are anticipated to contribute to adverse impacts within the Midway Landfill Alternative study area.

4.4.3 Land Use

OMF South, in conjunction with other land use actions by local governments and other property owners, could result in cumulative impacts to land uses in the vicinity of the project alternatives. The cumulative impacts of these land use actions are contemplated in the analysis in Section 3.4, Land Use, as it includes a review of anticipated changes based on local and regional plans to accommodate future population and employment growth forecasts.

The purpose of OMF South is to support the expansion of the Link light rail system under Sound Transit 3. Cumulatively, the Sound Transit light rail projects and planned development projects could help achieve goals that encourage and support high-density, mixed-use, transit-oriented development. Although there are reasonably foreseeable future land developments in the study area that would increase density without light rail, the Sound Transit 3 projects supported by OMF South, such as TDLE, would support a greater density of development than would likely occur without light rail, particularly near planned light rail stations in Federal Way. Land use changes are expected to be greatest near stations due to increased transit accessibility and pedestrian activities, which are generally attractive to businesses and residents. Any necessary changes to development regulations to allow higher density and more intense land use would be within the discretion of local governments.

All three build alternatives would displace commercial or light industrial uses to different degrees, which could add to the demand for commercial or industrial land in the region as displaced businesses would have to relocate to other areas that could accommodate their use. However, this concern would be addressed through periodic updates to regional and local comprehensive plans, which include regionally coordinated land capacity analyses. Through these updates, cities and counties must adopt future land use maps to ensure they have the land capacity available to accommodate future population and employment growth.

There are several reasonably foreseeable projects occurring within or near the study area of the Preferred and South 344th Street alternatives, including FWLE, TDLE, Federal Way's City Center Access Project, and WSDOT's SR 509 Completion Project, all of which would convert existing land uses to transportation land uses (Sound Transit 2016b; WSDOT 2003; FHWA/WSDOT 2018). The cumulative land use impacts of these projects would be to reduce traffic congestion and support the expansion of the light rail and high-capacity transit system consistent with the Washington State's Growth Management Act, PSRC's Vision 2050, and local comprehensive plans.

There are no current or future development projects within 0.5 mile of the Midway Landfill Alternative that are anticipated to affect adjacent land uses aside from FWLE.

4.4.4 Economics

The analysis in Section 3.5, Economics, used PSRC data to account for future regional and local activity changes in regional population, employment, and housing. County assessor's data and subarea plans were used to examine existing and future land uses in the local area.

When combined with other foreseeable projects, the OMF South project is anticipated to have a small impact on the regional economy. There are potential additional impacts associated with OMF South when considered with FWLE and TDLE. It is possible that multiple construction projects taking place at the same time may exacerbate the economic effects described in Section 3.5 (including changes related to the potential displacement of employees and businesses), which may result in greater impacts. Sound Transit would minimize this through coordination of construction activities to limit potential disruption, such as through the development of transportation management plans. Construction of TDLE and the WSDOT SR 509 Completion Project could potentially occur at the same time as OMF South but are not currently expected to have substantial adverse impacts on the region when considered in the context of OMF South. Additionally, the combined job-creation impacts would be positive.

In Federal Way, the Woodbridge Corporate Park (Weyerhaeuser Campus) Redevelopment project started construction of two industrial buildings in 2022; once redevelopment is completed the campus is estimated to generate 3,100 new jobs (Industrial Realty Group 2022). Table 4.3-1 lists other reasonably foreseeable projects in Federal Way, some of which do not have an established schedule for completion. Without knowledge of when these projects will be completed or what their business impacts will be, this assessment cannot determine the potential cumulative economic impact in the context of the OMF South project.

Some of the potential cumulative effects from multiple projects may be offset by applying the same mitigation measures identified in Section 3.5, Economics, including coordination with businesses and districts during construction, signage to help patrons find businesses, and other measures.

4.4.5 Environmental Justice, Social Resources, Community Facilities, and Neighborhoods

Actions that occurred in the past, such as the development of the roadway and transit network within the study area, as well as implementation of prior land use plans, have resulted in the development patterns that shape the neighborhoods in the study areas. As a result of OMF South and other reasonably foreseeable future transportation projects, commercial and residential development projects, and land use changes, these neighborhoods could experience benefits. For example, the South Federal Way alternatives being evaluated for TDLE include a new light rail station within the study areas for the Preferred and South 344th Street alternatives. The neighborhoods surrounding a new light rail station would likely experience the greatest changes, including added transportation infrastructure and associated development. Additional benefits could include residential infill, growth in employment base, and greater support of local businesses.

Future private development, particularly around station areas, could increase property values and taxes and may affect the availability of affordable housing opportunities or affordable

properties for small businesses. Affordable housing goals and policies of local jurisdictions and Sound Transit could encourage affordable housing options.

If OMF South were constructed at similar times as other large infrastructure projects, such as TDLE, residents and businesses could experience increased short-term construction impacts due to cumulative increases in congestion, noise, access limitations, and construction durations. Mitigation measures identified in Section 3.6, Environmental Justice, Social Resources, Community Facilities, and Neighborhoods would be implemented to reduce cumulative construction impacts on neighborhoods or community facilities.

4.4.6 Visual and Aesthetic Resources

Construction of I-5 in the 1960s, along with the associated commercial and residential development, was a major change to the visual environment in the project corridor. The freeway and corresponding development along SR 99 in recent decades also changed other more natural or rural landscapes. The addition of OMF South between SR 99 and I-5, along with several other planned road widenings and interchange improvements, would further increase the visual prominence of the transportation infrastructure.

If constructed at the same time as other reasonably foreseeable future actions, viewers could experience more visual impacts during construction. Cumulative visual impacts in the area could occur with increased private development near station areas associated with FWLE and TDLE. In addition, FWLE and TDLE, combined with OMF South, could have cumulative impacts due to additional elevated track and large structures. There would also be a cumulatively substantial clearing of trees and vegetation, particularly on the track alignments adjacent to I-5. Although most cumulative impacts would occur in previously developed areas or adjacent to other existing large infrastructure, thus making the cumulative nature of these impacts minimal, OMF South and other reasonably foreseeable projects could increase the overall impacts on the surrounding visual environment.

4.4.7 Air Quality and Greenhouse Gas Emissions

The operational air emissions from the build alternatives are inherently cumulative. The analysis found in Section 3.8, Air Quality and Greenhouse Gas Emissions, finds that the build alternatives would not result in an exceedance of the National Ambient Air Quality Standards or the Washington Ambient Air Quality Standards. While there is a potential for construction schedules to overlap with other projects in the area, the temporary nature of air quality construction impacts and the use of standard construction BMPs makes it unlikely that air quality standards would be exceeded. Therefore, the proposed project, combined with past, present, and reasonably foreseeable future actions, would not contribute to a cumulative adverse impact on air quality or GHG emissions. Additionally, because OMF South is necessary for the efficient operation of the Sound Transit 3 light rail system expansion, its construction and operation would support a cumulative regional reduction in vehicle miles traveled that would result in a cumulative decrease in regional auto-related emissions that contribute to GHGs (Sound Transit 2016a).

4.4.8 Noise and Vibration

Cumulative impacts for the OMF South project would be associated with TDLE and Federal Way's proposed City Center Access Project for the Preferred and South 344th Street

alternatives. There would be no cumulative noise impacts associated with the Midway Landfill Alternative.

If TDLE is constructed, approximately 144 LRVs would be needed and stored at OMF South. With the additional vehicles, there would be additional operations within the facility, including additional LRV movements into and out of the facility in the morning and evening, respectively. Additionally, for the Preferred and South 344th Street alternatives, the LRVs leaving and entering would be split between the northern and southern tracks leading to the mainline tracks. The additional LRVs from TDLE operating from within the OMF South alternative sites would increase some noise levels, but they would not be loud enough to cause FTA noise impacts or WAC exceedances (see Appendix G2, Noise and Vibration Technical Report).

The mainline tracks connecting the Preferred and South 344th Street alternatives would become the operational track for TDLE, with higher speeds and additional LRV operations throughout the day. As a result, the operation of TDLE on the mainline tracks is anticipated to cause additional noise impacts to residences near the mainline tracks in Belmor from the 40 mph Alignment and 55 mph Design Option. Impacts would occur where the mainline curves south of S 324th Street and near the mainline north of S 336th Street. The larger number of trains that would be in revenue service along the mainline with TDLE would have a greater impact than the number of trains moving to and from the OMF site with the OMF South project only. There would be no cumulative noise impacts from TDLE for the Midway Landfill Alternative because the mainline tracks adjacent to the site would already be built as part of FWLE and operating as revenue-generating tracks.

There would be no vibration impacts associated with OMF South. With the inclusion of the TDLE project, there would be an increase in vibration levels due to the higher speed of the trains, but no cumulative vibration impacts are anticipated. With the Midway Landfill Alternative, there would be no cumulative vibration impacts from the FWLE project.

Further details regarding TDLE noise and vibration impacts and mitigation will be included in the Tacoma Dome Link Extension Draft Environmental Impact Statement, which is expected to be published in mid-2024. The Draft EIS will include recommended mitigation measures, such as noise barriers, for any noise impacts on sensitive receptors near the mainline tracks needed for operations of TDLE. To improve efficiency and eliminate the impacts of two construction activities in the same location, the OMF South project is anticipated to construct noise mitigation required for TDLE if the Preferred Alternative or South 344th Street Alternative is selected as the project to be built.

The City Center Access Project together with OMF South and TDLE could result in some cumulative noise impacts to a small number of receptors south of S 324th Street without mitigation. The City Center Access Project proposes to extend S 324th Street across I-5 to the east, which may increase motor vehicle traffic noise that would require mitigation.

4.4.9 Ecosystem Resources

Past actions and urban development have changed the ecological landscape in the study area and vicinity, and ongoing and reasonably foreseeable future actions could contribute to additional cumulative impacts. To address the effects of past development, restoration programs and projects (e.g., aquatic and terrestrial habitat improvement projects as well as culvert replacement projects to eliminate barriers to fish passage) are being planned and implemented throughout the region. The potential for any of the build alternatives to result in adverse cumulative impacts would be related to the direct impacts of that alternative. In other

words, a build alternative with a greater extent and/or intensity of adverse impacts on ecosystem resources would have a greater risk of adverse cumulative impacts.

Sound Transit’s FWLE project is currently in construction. The mitigation report for FWLE identified impacts on 0.9 acre of wetlands, 4.5 acres of wetland buffer, and 0.2 acre of riparian forest buffers. In addition, the Federal Way Link Extension Final Environmental Impact Statement identified impacts on 35 acres of forested habitat (Sound Transit 2016b). That Final EIS also analyzed impacts associated with the relocation of approximately 1,000 linear feet of stream channel. These impacts will be mitigated through the permitting process with regulatory agencies and local jurisdictions. The project was designed to allow WSDOT to implement fish passage improvements on Bingaman Creek in the future, if necessary (FTA 2017). In addition, by complying with WSDOT and local jurisdictional rules concerning tree replacement, FWLE is expected to increase the amount of vegetated area over the long term.

Table 4.4-1 lists other reasonably foreseeable future projects that could affect ecosystem resources in the study area.

Most of these projects are on developed or partially developed parcels. Nevertheless, possible short-term and long-term impacts of these projects include loss or degradation of vegetation, wildlife habitat, streams, wetlands, and associated buffer areas. Between OMF South, FWLE, and TDLE, there would be substantial clearing of trees and vegetation with adverse cumulative effects on forested habitat, particularly on the alignment routes adjacent to I-5.

Coupled with the impacts of the past, present, and future projects described above, the impacts of the build alternatives could contribute cumulatively to reductions in the area and function of ecosystem resources in the study area. Sound Transit commits to meeting or exceeding requirements for mitigation and compensating for project impacts to ecosystem resources during design and permitting. The potential for future projects to adversely affect ecosystem resources in the study area would be limited by meeting regulatory requirements under federal, state, and local regulations. These reviews and permitting processes would ensure the implementation of measures to avoid or minimize both short-term and long-term impacts on ecosystem resources as well as compensatory mitigation for unavoidable impacts on wetlands, streams, and their buffers. It may take several years for the forested vegetation communities or decades for mature forested communities to return to their preconstruction habitat function.

Table 4.4-1 Ecosystem Resource Impacts from Reasonably Foreseeable Future Projects in the Study Area

Project	OMF South Alternatives Potentially Affected	Potential Ecosystem Impacts
Sound Transit TDLE	Preferred South 344th Street	TDLE is proposed along the west side of I-5 and would impact East Fork Hylebos Tributary, associated wetlands, and riparian buffers.
Federal Way City Center Access Project	Preferred South 344th Street	The project design includes the replacement of three state-owned culverts where East Fork Hylebos Tributary crosses I-5 (WDFW Site ID numbers 995300, 995299, and 992364), plus a privately owned culvert at Winged Foot Way (WDFW Site ID number 420614) that is directly connected to culvert 992364.
The Creekside Commons Townhome Development	Preferred	Proposed on about 10 acres of forested land north of the Preferred Alternative, clearing and site development will reduce the width of the forested buffer on West Fork Hylebos Tributary in that area.
WSDOT I-5/SR 161/SR 18 Triangle	Preferred South 344th Street	Vegetation clearing and ground-disturbing work for this project could affect East Fork Hylebos Tributary south of the OMF

Table 4.4-1 Ecosystem Resource Impacts from Reasonably Foreseeable Future Projects in the Study Area (continued)

Project	OMF South Alternatives Potentially Affected	Potential Ecosystem Impacts
Interchange Vicinity Improvements (project suspended with no resumption date set)		South alternatives in Federal Way. WSDOT plans to replace an approximately 370-foot-long culvert with approximately 560 linear feet of open channel, removing an existing, partial barrier to fish passage and increasing the amount of functioning aquatic and riparian habitat available in the stream system. This project would also remove several other partial or complete barriers to fish passage on this stream downstream of the study area
WSDOT SR 509 Completion Project (part of the Puget Sound Gateway Program)	Midway Landfill	The only proposed project element near the site is an auxiliary lane on southbound I-5. Construction of an auxiliary lane in that area would be unlikely to adversely affect ecosystem resources at or near the Midway Landfill Alternative. WSDOT will be expanding the wetland and stream habitat complex as part of the Program's Riparian Restoration Plan. 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. The proposed site is in Fife, adjacent to I-5 in the area known locally as the Fife curve.

4.4.10 Water Resources

Development throughout the Puget Sound region has substantially altered the hydrology of drainage basins, including substantial changes in water quality and flow in the Hylebos Creek basin. Population growth and the accompanying substantial urbanization and associated increase in pollution-generating impervious surfaces have increased runoff volumes and contaminant loading to surface water bodies and have decreased groundwater infiltration and recharge, which plays a critical role in dry-season baseflow contributions.

The proposed project would be required to manage runoff in compliance with federal, state, and local regulations, which would avoid and minimize impacts on surface and groundwater. The mitigation would include providing flow control and water quality treatment for runoff from some existing impervious and pollution-generating surfaces that may either be currently uncontrolled or not manage to current standards. Updating infrastructure to comply with current regulations can prevent further harm to water resources and could lead to gradual improvements to water quality over time. Advances in flow control methods aim to simulate predevelopment conditions but are typically not able to completely reproduce them.

Over time, other regional new development and redevelopment are expected to bring many existing impervious and pollution-generating surfaces up to current standards of flow control and water quality treatment for stormwater runoff. Improvements in stormwater runoff control and water quality would occur over time, with or without this project, meaning the changes could be expected to be smaller and more gradual. This retrofit through redevelopment would avoid additional impacts to water resources in the area and could result in modest improvements in the hydrology and water quality of the streams within the OMF South study area.

Additionally, the expanded Link light rail system, which the OMF South project would support, would slow the increase in vehicle miles traveled as population in the area increases. This slowing of the increased vehicle use would mean slower increase in polluted runoff and future impacts to water quality.

4.4.11 Geology and Soils

OMF South would be entirely within a highly urbanized area. In general, surface geology and soil conditions have already been substantially altered, particularly for the Midway Landfill Alternative. The proposed earthwork for the Preferred and South 344th Street alternatives would have little or no meaningful impact on existing, long-term geologic, hydrogeologic, or soil conditions in the study area. Similarly, even though the Midway Landfill Alternative could result in a substantial amount of earthwork, depending on the subsurface construction design option, it is not expected to contribute to substantial cumulative impacts when added to potential impacts for other reasonably foreseeable actions expected within the study area.

4.4.12 Hazardous Materials

Similar to other projects in the vicinity, Sound Transit would adhere to applicable regulations regarding the handling and treatment of contaminated materials during construction and long-term operation of the projects. While construction and operation of OMF South at the Midway Landfill Alternative site would have the potential to result in the release of hazardous materials or contamination of air or groundwater, plans for the mitigation, handling, and disposal of contaminated media and hazardous construction debris would be developed in conjunction with the appropriate regulatory agencies. As a result, the proposed project is not anticipated to have an adverse effect and could have a net beneficial impact on the environment. Similarly, all other related projects' development would require the remediation of any contaminated sites encountered in compliance with state and federal environmental regulations, consequently improving overall environmental quality. Therefore, there would be no cumulative impacts of the related projects when combined with the proposed projects, on hazardous materials in the build alternative sites.

4.4.13 Public Services

The OMF South project would not increase demand for public services; however, planned growth in population, employment, and general urban activity in the study area would affect public service demand, including emergency and public safety services. The FWLE and TDLE projects, supported by OMF South, would support a greater density of development, particularly near planned light rail stations which are generally attractive to businesses and residents. The FWLE Kent/Des Moines Station is within the Midway Landfill Alternative study area, and a new light rail station proposed in South Federal Way for TDLE is within the study area for the Preferred and South 344th Street alternatives. Therefore, the cumulative impacts associated with increased development could lead to additional demand for public services, such as emergency services, within the OMF South study area. These incremental increases are anticipated to be minor.

4.4.14 Utilities, Energy, and Electromagnetic Fields

Utilities

Development near the project would be consistent with what is allowed in the adopted land use plans and current local development regulations. Therefore, the cumulative impacts on utilities would be negligible and in accordance with planned growth.

Energy

The proposed OMF South project would result in net increases in electricity and natural gas consumption and demand under all build alternatives. It is anticipated that PSE would have

sufficient capacity and energy resources to accommodate any increase in energy consumption. When considered together with the reasonably foreseeable future projects, as well as ongoing local, regional, and statewide efforts to increase energy efficiency and conservation, the proposed OMF South project would not contribute to a cumulative adverse energy impact. Additionally, the expanded Link light rail system, which the OMF South project would support, would lead to a regional reduction in vehicle miles traveled, which would lead to a reduction in the use of oil, gasoline, and diesel fuels (Sound Transit 2016a).

Electromagnetic Fields

The FWLE Final EIS notes that there are no potentially EMF-sensitive receptors close to the FWLE alignment (Sound Transit 2016b). Similarly, there are also no potentially EMF-sensitive receptors close to the proposed TDLE alignment or OMF South alternatives. No areas were identified where EMFs would combine with past, present, or future actions to result in human health effects or effects on facilities with EMF-sensitive equipment. Therefore, no EMF cumulative impacts would result from the proposed project.

4.4.15 Historic and Archaeological Resources

OMF South is not expected to result in significant impacts to cultural resources. All build alternatives have the potential to affect unidentified archaeological resources within the study area, but the only known historic properties are the Tacoma-Covington No. 2, 3, and 4 and Tacoma-Raver No. 1 transmission lines, which OMF South would not adversely effect. The project has an Inadvertent Discovery Plan to address the potential discovery of archaeological resources during construction. Appendix G4, Historic and Archaeological Resources Technical Report includes the plan.

The reasonably foreseeable future actions in the project vicinity, including the Link system expansion projects that OMF South would support, may have direct impacts on historic or archaeological resources in the study areas. The settings surrounding these resources have been altered by past and present redevelopment and general changes in uses surrounding them. If OMF South encounters unidentified archaeological resources during construction, it could contribute to a cumulative impact on historic and archaeological resources.

4.4.16 Parks and Recreational Resources

No major changes to parks or recreational resources by OMF South or other reasonably foreseeable future projects or actions are anticipated. Population and employment growth are expected to occur under both the No-Build and the build alternatives and would likely increase the use of parks and recreational facilities throughout the project area.

5 COMMENT SUMMARY

See Appendix L for full comments and responses to both the 2021 SEPA Draft EIS and the 2023 NEPA Draft/SEPA Supplemental Draft EIS.

5.1 Overview of the 2021 Draft Environmental Impact Statement Comment Period

Sound Transit published the OMF South SEPA Draft Environmental Impact Statement on March 5, 2021. The comment period 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. 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.

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. Table 5.1-1 summarizes the type of commenters who provided feedback.

Table 5.1-1 Comments Received by Commenter Type

Commenter Type	Number
Federal Agency	0
Tribe	1
State Agency	2
Regional and Local Agency of Jurisdiction	6
Elected Officials	1
Businesses and Community Groups	12
Individual	250
Total	272

5.1.1 Comments from Tribes, Agencies, and Jurisdictions

The Puyallup Tribe of Indians, along with several state, regional, and local agencies, provided comments as summarized below.

5.1.1.1 The Puyallup Tribe of Indians

The Puyallup Tribe of Indians Fisheries Department stated that they prefer that OMF South be placed at the Midway Landfill. The Tribe's comments primarily concerned impacts to ecosystems (streams, riparian buffers, and downstream fish habitat) as well as water resources (water quality and groundwater recharge). The Puyallup Tribe of Indians Fisheries Department

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, which would be affected by the project.

The Puyallup Tribe of Indians Fisheries Department 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 Fisheries Department asked that the description of the distribution of Chinook salmon be revised to reflect tribal fisheries data in the Final Environmental Impact Statement.

5.1.1.2 State Agencies

Washington State Department of Ecology

Ecology's comments on the 2021 SEPA Draft EIS focused on the Midway Landfill Alternative, and most comments were on the Midway Landfill Support Documents, Appendices D1 through D4. Generally, Ecology asked 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 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 along I-5. For example, they noted that Resource Conservation Area 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 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 Board will consider the potential impacts of the OMF South project to these populations in their decision-making process.

5.1.1.3 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 EIS and to include transit in the construction transportation management plan. Their letter suggested specific traffic study revisions to clarify how 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 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 South 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 of the 2021 SEPA Draft EIS. 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 the sites in Federal Way.

The letter questioned the inclusion of cost estimate information in the 2021 SEPA Draft EIS 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 2021 SEPA Draft EIS. The letter began with several questions and comments about cost and schedule and stated that estimated project costs and construction schedules are not required to be considered under SEPA. The city suggested that only environmental impacts should be considered in a SEPA EIS.

The letter requested that several corrections and clarifications 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 2021 SEPA Draft EIS 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 2021 SEPA Draft EIS 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 re-developable 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 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 2021 SEPA Draft EIS 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 2021 SEPA Draft EIS 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 over 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 2021 SEPA Draft EIS, 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 2021 SEPA Draft EIS'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 2021 SEPA Draft EIS compared to what was experienced during FWLE construction, as SPU implied 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 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.

5.1.1.4 Elected Officials

Representative Jesse Johnson

At the time of publication of the 2021 SEPA Draft EIS, Jesse Johnson was the 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.

5.1.2 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

Christian Faith Center

Christian Faith Center submitted a comment letter stating that they would prefer that the Christian Faith Center property was not part of any alternative. The letter explains that the 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 relocated and start a multiyear redevelopment process. Under the South 344th Street Alternative, the church would also need to be relocated 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.

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.

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 become a 24/7 operation. 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.

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 Causseaux, expressing concerns similar to those from Ellenos Yogurt. The letter includes comments on the 2021 SEPA Draft EIS 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".

GarageTown Condominium Association

Brad Thorson, the president of the GarageTown Federal Way Condominium Association, submitted two emails with comments on the 2021 SEPA Draft EIS. 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.

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.

Federal Way Custom Jewelers

The owner of Federal Way Custom Jewelers supports 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.

Northwest Equipment Sales and Rentals

The owner of Northwest Equipment Sales and Rentals expressed concern over the potential displacement of his property at 2011 S 341st Place 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.

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.

1910 and 1934 South 344th Street

Greg and Donna Olson shared concerns about 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.

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 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.

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 2021 SEPA Draft EIS 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 2021 SEPA Draft EIS.

Protect Federal Way also believes that many small businesses will close rather than relocate and associated jobs will be lost. They state the South 344th Street Alternative has the most painful and highest cost to their community and ask that it be removed from consideration.

5.1.3 General Public Comments

During the OMF South SEPA Draft EIS comment period, Sound Transit received 250 communications from the general public. 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.

5.1.3.1 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 preferences both for and against multiple site alternatives; each preference statement was tallied individually.

Approximately 30 people suggested alternative sites other than those evaluated in the 2021 SEPA Draft EIS. 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 2021 SEPA Draft EIS build alternatives.

South 336th Street Alternative

Approximately 80 people expressed opinions 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.

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.

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 fewest 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.

5.2 Overview of the 2023 NEPA Draft/SEPA Supplemental Draft Environmental Impact Statement

The 2023 NEPA Draft/SEPA Supplemental Draft Environmental Impact Statement was published on September 22, 2023. There was a 45-day comment period, during which Tribes, agencies, and members of the public were invited to comment. The comment period ended November 6, 2023.

An online open house was live for the duration of the comment period (September 22 to November 6, 2023). The public could visit the website to review what had changed since the 2021 SEPA Draft EIS, review a summary of the findings of the 2023 NEPA Draft/SEPA Supplemental Draft EIS and supporting materials, and submit comments via an online comment form.

Sound Transit hosted one online public meeting and one in-person public meeting to provide general information about the Draft EIS and offer attendees the opportunity to provide public comment. The online public meeting was held on Zoom on Thursday, October 19, from

11:30 a.m. to 1:30 p.m., with more than 20 people attending. The in-person meeting was held at the Federal Way Performance Arts & Events Center on Tuesday, October 24, from 5:30 to 7:30 p.m., with approximately 25 attendees.

Table 5.2-1 summarizes the type of commenters who provided feedback.

Table 5.2-1 Communications Received by Commenter Type

Commenter Type	Number
Tribe	1
Federal Agency	2
State Agency	1
Local Jurisdiction	1
Business or Community Group	1
Individual	52
Total	58

5.2.1 Comments from Tribes, Agencies, and Jurisdictions

Sound Transit received five communications from the following Tribes, federal and state agencies, and local jurisdictions:

- Suquamish Indian Tribe of the Port Madison Reservation (Suquamish Tribe)
- EPA
- FHWA
- WSDOT
- City of Federal Way

5.2.1.1 Tribes

Suquamish Tribe

The Suquamish Tribe confirmed receipt of the 2023 NEPA Draft/SEPA Supplemental Draft EIS and stated that they had no comments or concerns regarding cultural resources based on the analysis in the Historical and Archaeological Resources Technical Report (Appendix G4) and its associated attachments.

5.2.1.2 Federal and State Agencies

Environmental Protection Agency

EPA's comments focused on environmental justice. EPA believes OMF South has "the potential to disproportionately impact communities with environmental justice concerns, including tribal, minority, and low-income communities."

EPA asks that the Final EIS further evaluate and identify communities with environmental justice concerns and suggests specific tools for that evaluation, including EPA's EJScreen and the Washington State Department of Health Environmental Health Disparities Map.

EPA believes the Final EIS should include a more complete description of efforts to meaningfully engage with communities with environmental justice concerns and describe how those engagement efforts were used to develop the proposed project. EPA also asks for more information in the Air Quality analysis to address potential impacts on environmental justice communities.

EPA also suggested that Final EIS include more information on surface water quality and a discussion of the recent EPA-approved Water Quality Standards. The letter also asks for information regarding permitting.

EPA suggested coordinating with other agencies on specific topics, including the EPA Region 10 Superfund Program regarding the Midway Landfill Alternative and USFWS, NMFS, and WDFW regarding potential impacts to biological resources. EPA also recommends the Final EIS describes Tribal coordination and how issues have been addressed.

EPA recommends the Final EIS include more detail on monitoring construction of the project and the development of an adaptive management plan so that any necessary adjustments can be made to meet environmental objectives.

Finally, EPA asks that the Final EIS include an analysis of the social cost of greenhouse gas emissions.

Federal Highway Administration

FHWA's comments focused on the language accessibility of public outreach and impacts concerning ecosystem and water resources; environmental justice; noise; acquisitions, displacements, and relocations; and transportation.

FHWA asked that the discussion on 6PPD-quinone be expanded to include more recent research on salmonid mortality. There were also comments asking for clarification in the Water Resources analysis concerning pollutant-generating impervious surfaces.

FHWA suggested specifying that there would be fewer noise impacts from the mainline because property acquisitions would increase the distance between sensitive receptors and the track would make the noise analysis more understandable to the reader.

Several comments were made on the Acquisitions, Displacements, and Relocation analysis, mostly relating to definition of terms.

Washington State Department of Transportation

WSDOT provided comments on stormwater, ecosystem resources, community impacts, and hazardous materials. WSDOT asked Sound Transit and FTA to inventory WSDOT-owned and managed facilities that could be affected by the project to ensure adequate mitigation is provided. WSDOT recommended that fish passage barriers be identified with Washington Department of Fish and Wildlife identification numbers and ownership and provided a link to WSDOT's current 2030 fish passage delivery plans. Additionally, WSDOT asks how the 2019 Memorandum of Understanding between Sound Transit and Ecology concerning stormwater runoff from mainline tracks will apply to OMF South.

5.2.1.3 Local Jurisdictions

City of Federal Way

Federal Way provided comments on the 2023 NEPA Draft/SEPA Supplemental Draft EIS and resubmitted comments made on the 2021 SEPA Draft EIS, incorporating them by reference. Federal Way supports the selection of the Midway Landfill Alternative.

The city provided comments on impacts related to transportation; social resources, community facilities, and neighborhoods; economics; land use; visual and aesthetic resources; noise and vibration; ecosystems resources; and cumulative effects. Their comments focused mainly on transportation and land use. Under transportation, Federal Way believes that the analysis does not adequately analyze the Preferred and South 344th Street alternatives because not all proposed driveways and intersections were included in the analysis and some incorrect driveways were included. Federal Way notes that the city controls all intersections in the study area for the alternatives, including those along state routes, so the analysis should list volume/capacity ratios for all intersections. The city also expressed concern over the safety impacts of the project, noting that the South 344th Street Alternative does not include designs to replace the current bicycle and pedestrian path, which is present at the site.

Federal Way believes there is insufficient information to be able to make an informed decision regarding changes to existing land uses and vacating streets and that supplemental trip generation analysis and volume figures should be provided. Federal Way also asks about replacement parking due to impacts to the Federal Way/S 320th Street Park & Ride.

Federal Way had a number of comments concerning Appendix H2, Land Use Technical Appendix, disagreeing with some of the conclusions regarding zoning and comprehensive plan consistency.

5.2.2 Comments from Businesses and Community Groups

Sound Transit received one communication from a potentially affected business and community group, the GarageTown Condominium Association. The GarageTown Condominium Association continues to support development of the Midway Landfill for the OMF South and strongly opposes the South 344th Street Alternative.

The association commented on the proposed extension of 21st Avenue S with the Preferred Alternative. They are concerned that it would intrude onto the southeast corner of the GarageTown property, reducing the width of GarageTown's eastern driveway and an emergency secondary access for fire equipment. The association also states that retaining the cul-de-sac at the eastern end of S 344th Street is unnecessary and undesirable, as it is a known site for illicit activity.

The GarageTown Condominium Association is strongly opposed to replacing the culvert under S 344th Street with a fish passable structure due to concern of potential damage to buildings if the existing culvert is excavated. They suggest rerouting the stream instead.

5.2.3 General Public Comments

During the OMF South Draft EIS comment period, Sound Transit received 52 communications (letters, emails, oral comments at public hearings, online comment form) from the general public.

Within the 52 communications there were approximately 139 individual comments, which are summarized in the following subsections. General or project-wide comment topics are described first, followed by comments about specific OMF South alternatives.

5.2.3.1 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. Six individuals submitted a comment letter that expresses opposition to the Federal Way alternatives and asks Sound Transit to reconsider other sites, particularly in Fife. The letter cites ecosystem concerns, and land use and zoning issues as reasons why the Federal Way sites should not be chosen.

5.2.3.2 Preferred Alternative

Of the 37 commenters who expressed support for a particular site, 10 supported the Preferred Alternative (one supported both the Preferred or South 344th Street alternative), citing the alternative's proximity to SR 99 and the belief that the current uses on the site could be relocated in the area. Of the 22 commenters that expressed opposition to a particular site, 17 opposed the selection of the Preferred Alternative (nine expressed opposition to both the Preferred and South 344th Street alternatives). Most of these commenters feel that Federal Way has been disproportionately affected by Sound Transit projects.

5.2.3.3 South 344th Street Alternative

Of the 37 commenters who expressed support for a particular site, two supported the South 344th Street Alternative (one supported either the Preferred or South 344th Street alternative) because of its proximity to I-5. Of the 22 commenters who expressed opposition to a particular site, 11 opposed the selection of the South 344th Street Alternative, citing impacts to businesses and employment (nine expressed opposition to both the Preferred and South 344th Street alternatives).

5.2.3.4 Midway Landfill Alternative

Of the 37 commenters who expressed support for a particular site, 22 supported the Midway Landfill Alternative. Supporters cited the relative lack of impacts to businesses and natural resources. Of the 22 commenters who expressed opposition to a particular site, three opposed the selection of the Midway Landfill Alternative: one with no reason cited, the others expressing concern over construction at a Superfund site and the uncertainties around cost and schedule.

5.3 Responses to Common Comments

Sound Transit reviewed all comments submitted during both comment periods. Appendix L, Draft EIS Comments and Responses includes responses to each of the comments received during the comment periods. Many of the comments expressed similar themes, such as support for a particular alternative or concern about a specific issue. Table 5.3-1 provides responses to the most common comments. These responses are also referenced in Appendix L, using the common comment number found in the first column of the table.

Table 5.3-1 Responses to Common Comments

Number	Common Comment	Response
1	<p>Sound Transit underestimated the impacts associated with business and employee displacements. The EIS should report an accurate number of employee displacements, or the total number of jobs gained or lost. Specifically, neither Ellenos Yogurt nor GarageTown could be easily relocated, and the impacts to those properties are not characterized adequately. GarageTown comprises multiple owners.</p>	<p>The number of displaced employees is based on the business building size (taken from King County Department of Assessment data) and the type of business activity using square-foot-per-employee factors from the U.S. Department of Energy and the Institute for Transportation Engineers. While not an actual survey of businesses, it allows an equal comparison between alternatives without having to access confidential or proprietary business information.</p> <p>The Final EIS does not calculate a net job gain or loss because relocation decisions are determined by individual business owners. Some displaced businesses may choose to relocate, while others may choose to permanently close when their property is purchased. As described in Section 3.3., Acquisitions, Displacements, and Relocations, Sound Transit provides relocation assistance to displaced businesses and, on past projects, has successfully helped many businesses that chose to relocate within the project area. To estimate the number of GarageTown owners, Sound Transit used GarageTown's website to count the number of displaced units.</p> <p>The Final EIS acknowledges that both Ellenos Yogurt and GarageTown are unique facilities that would be challenging to relocate. This is described in Section 3.3, Acquisitions, Displacements, and Relocations.</p>
2	<p>There would be too many residential displacements with either of the alternatives in Federal Way. Many of these displacements would affect lower income and/or elderly residents. Relocation of residents of Belmor Mobile Home Park is of particular concern.</p>	<p>The Preferred Alternative would displace up to 97 residences, mostly concentrated in the Belmor residential area. Section 3.3, Acquisitions, Displacements, and Relocations, describes the relocation benefits for displaced residents (both owners and tenants); it also provides specific information about relocation of mobile homes. Displacements from all alternatives would occur in areas with concentrations of minority and low-income populations. Appendix E, Environmental Justice Assessment, discusses how displacements would affect low-income and minority populations and how Sound Transit would provide advisory services to help find comparable housing for these residents.</p> <p>For properties that require relocation, Sound Transit's policies and procedures comply with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (as amended) and Washington State's relocation and property acquisitions requirements. In some cases, Sound Transit provides advisory services to property owners above the minimum requirements of federal and state law. Sound Transit would compensate affected property owners in accordance with Sound Transit's Real Estate Property Acquisition and Relocation Policy, Procedures, and Guidelines (Sound Transit 2017). Benefits would depend on the level of impact, available relocation options, and other factors.</p> <p>Sound Transit would offer relocation assistance that includes compensation and supporting services that consider the needs of those being relocated to help reduce inconveniences or hardships. Sound Transit would also satisfy federal and state requirements for residential relocation, which define a "comparable replacement dwelling" as having the following attributes:</p> <ul style="list-style-type: none"> • Decent, safe, and sanitary. • Adequate in size to accommodate the occupants. • Within the financial means of the displaced person. • Functionally equivalent.

Table 5.3-1 Response to Common Comments (continued)

Number	Common Comment	Response
		<ul style="list-style-type: none"> • In an area not subject to unreasonable adverse environmental conditions. • In a location generally not less desirable than the location of the displaced person's dwelling with respect to public utilities, facilities, services, and the displaced person's place of employment. <p>To meet these requirements, Sound Transit may identify relocation properties that are in better condition and of higher value than the properties being acquired. If so, tenants may be eligible for a down payment or rent supplement.</p>
3	Hylebos Creek and associated wetlands are important and need to be protected.	<p>Section 3.10, Ecosystem Resources, of the Final EIS discusses the project's anticipated impacts (and proposed mitigation) to two tributaries to Hylebos Creek and associated wetlands. In addition, the Final EIS recognizes that the project would impact existing vegetation, including mature forested buffer areas. Impacts to the two tributaries to Hylebos Creek and wetlands have been avoided and minimized where possible during conceptual design. After publication of the 2021 SEPA Draft EIS, Sound Transit modified the design of the Preferred Alternative to reduce impacts to streams and wetlands. Further avoidance and minimization of wetland impacts would occur during future design and permitting of the project. Native vegetation would be restored in wetlands and buffers temporarily affected by construction.</p> <p>Sound Transit has committed to achieving no net loss of wetland function and area on a project-wide basis. As part of the Section 404 and Section 401 permitting process under the Clean Water Act, Sound Transit would work with Tribes and resource agencies to develop a mitigation approach. As part of this approach, Sound Transit would develop plans for compensatory mitigation for the effects of the project on wetlands, streams, and regulatory buffers on a watershed basis. Potential mitigation areas downstream of the preferred alternative would enhance and restore wetlands and streams that contribute to the overall health of salmonids in the West Fork Hylebos Creek drainage. To the extent possible, off-site compensatory mitigation sites would be identified and would compensate for lost values in kind.</p>
4	<p>Comments limited to expressing a preference or objection to one or more alternatives, including preferences or objections supported by non-substantive comments or analysis already provided in the EIS. In particular, many commenters expressed a preference for the Midway Landfill Alternative based on the following reasons:</p> <ul style="list-style-type: none"> • Large, mostly vacant site • Relatively few natural environment impacts • Relatively few business displacements • No residential displacements 	<p>Sound Transit reviewed all comments submitted during the 2021 SEPA Draft EIS and 2023 NEPA Draft/SEPA Supplemental Draft EIS comment periods. NEPA and SEPA require Sound Transit to respond to substantive comments related to the content of the Draft EIS, but not to questions or comments limited to public policy decisions (e.g., general statements of support or opposition). Before identifying the Preferred Alternative, the Sound Transit Board received a comment summary report that included a copy of all comments submitted on the 2021 SEPA Draft EIS in November 2021. Appendix L of the Final EIS includes copies of the comments and responses to substantive comments made on both the 2021 SEPA Draft EIS and the 2023 NEPA Draft/SEPA Supplemental Draft EIS.</p> <p>The Midway Landfill Alternative was initially identified for study largely due to attributes that many commenters found appealing. While the Board did not identify the Midway Landfill Alternative as the Preferred Alternative for evaluation in the Final EIS, it is being carried forward as an alternative for consideration. After considering the Draft EIS comments, analysis in the Final EIS, and other factors, the Sound Transit Board will select the project to be built.</p>

Table 5.3-1 Response to Common Comments (continued)

Number	Common Comment	Response
	<ul style="list-style-type: none"> • Brownfield redevelopment potential <p>Commenters opposed the South 344th Street Alternative based on the following reasons:</p> <ul style="list-style-type: none"> • Greatest number of business and employee displacements • Impacts to GarageTown and Ellenos Yogurt • Ecosystem impacts • Residential displacements due to the mainline alignment <p>Reasons commenters gave for opposing the Preferred Alternative included:</p> <ul style="list-style-type: none"> • Ecosystem impacts • Displacement of Christian Faith Center • Residential displacements due to the mainline alignment 	
5	<p>Sound Transit should identify sources of federal funding for the project. Specifically, there are funds related to Superfund site redevelopment that could lower the costs of developing the Midway Landfill Alternative.</p>	<p>Sound Transit executed a grant agreement with the FTA in December 2023 for \$4.9M in 5307 funds for OMF South. Sound Transit will continue pursuing applicable federal funding sources to help fund the project including, but not limited to FTA's Capital Investments Grants programs (e.g., Expedited Project Delivery, Full Funding Grant Agreement), a U.S. DOT Build America Bureau Transportation Infrastructure Finance and Innovation Agreement (TIFIA) loan, and other federal sources such as EPA programs (e.g., Brownfields and Climate Pollution Reduction).</p>