



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

OMF South: Title VI  
Facility Equity Analysis:  
Addendum

**April 2024**

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## Acronyms and Abbreviations

ACS	U.S. Census Bureau American Communities Survey
Belmor	Belmor Mobile Home Park
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
FEA	Facility Equity Analysis
FTA	Federal Transit Administration
I-5	Interstate 5
LOS	level of service
LRV	light rail vehicle
NEPA	National Environmental Policy Act
OMF	operations and maintenance facility
OMF South	Operations and Maintenance Facility South
SEPA	State Environmental Policy Act
SR	State Route

# 1 INTRODUCTION

This report has been prepared as an addendum to the Facility Equity Analysis (FEA), which was issued in November 2021 for an operations and maintenance facility in the South Corridor (OMF South) of the Sound Transit service district. The purpose of the document is to determine whether any of the revisions to the OMF South project alternatives since 2021 would result in a disparate impact to populations based on race, color, or national origin.

A facility location creates an adverse effect when both direct costs, such as residential and business displacements, and indirect costs, such as construction impacts and public health risks, are greater than the benefits to the surrounding community associated with each proposed alternative facility location. The measurement of the costs and benefits of the facility location alternatives may include quantitative data and qualitative inputs from potentially impacted communities. A disparate impact occurs when the minority percentage of the population adversely affected by a facility location exceeds the percentage of the minority population of the Sound Transit service district by at least 5 percent.

This addendum was prepared in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S. Code 2000d), FTA Circular 4702.1B, and Sound Transit Resolution No. R2022-19.<sup>1</sup> The purpose of the document is to determine whether any of the facility location options would result in a disparate impact to populations based on race, color, or national origin. For this analysis, census data for minority population is used to represent race, color, or national origin.

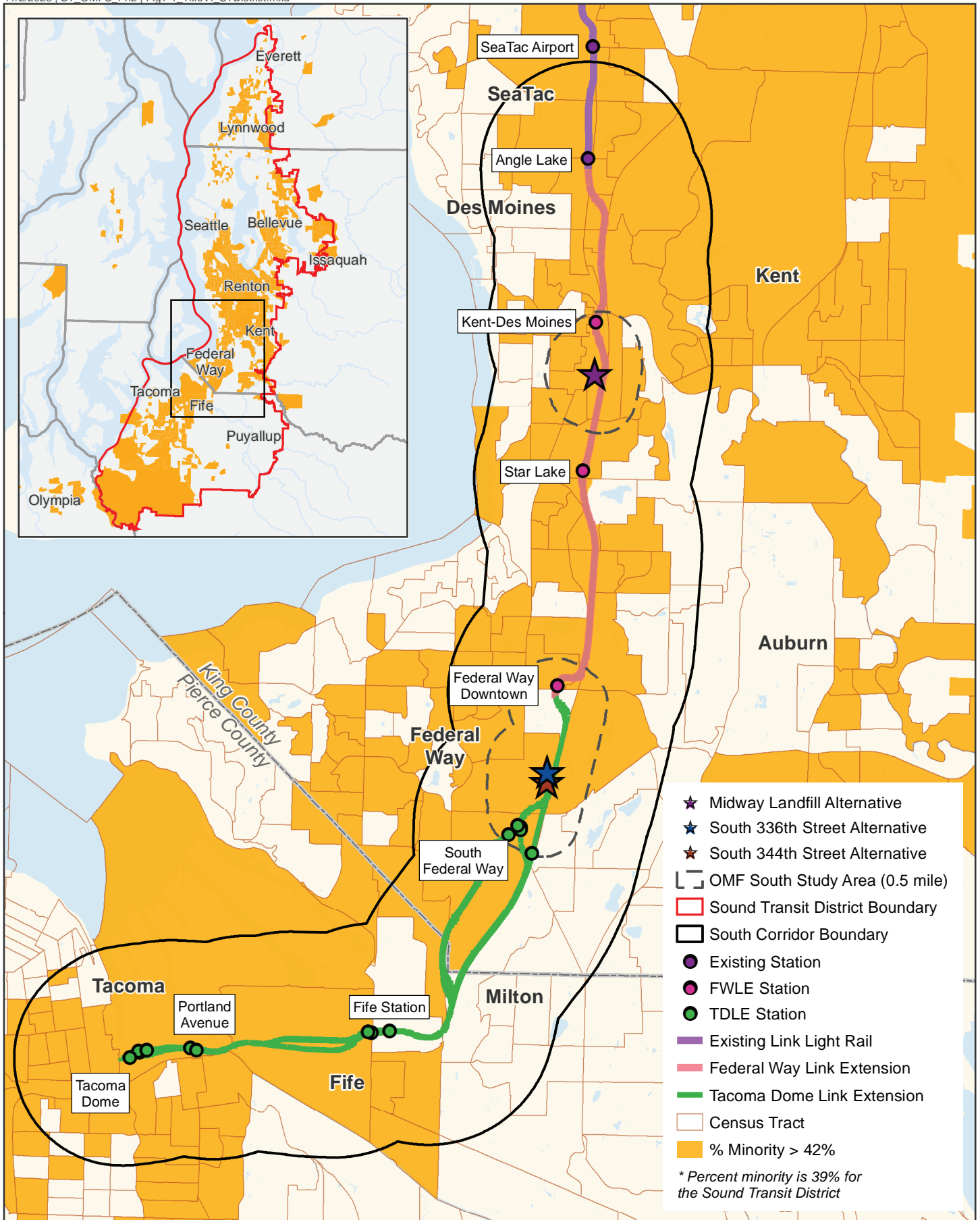
## 1.1 Background: Summary of FEA Findings

The November 2021 FEA includes background on the OMF South project, including descriptions of Sound Transit's mission, the project's purpose and need, the regulatory setting and methods of the FEA analysis, a description of the project alternatives, and a summary of outreach conducted during project development. OMF South is needed to support Sound Transit's Link light rail system expansion as identified in Sound Transit 3: The Regional Transit System Plan for Central Puget Sound. The FEA and this addendum are provided at <https://www.soundtransit.org/system-expansion/operations-maintenance-facility-south/documents>.

The FEA concluded that OMF South would not result in disparate impacts to the communities around any of its three build alternatives, known as the Midway Landfill Alternative, the South 336th Street Alternative (since identified as the Preferred Alternative), and the South 344th Street Alternative. Within the vicinity of each OMF South alternative there is a higher percentage of minority population than in the Sound Transit service district. Figure 1-1 shows the percent of minority population by census tract in the Sound Transit service district that are above and below the district average of 42 percent. Construction of OMF South at any of the alternative sites would result in localized temporary and long-term impacts. However, there would be mitigation for the impacts, and the benefits to the surrounding communities from improved transit service in the South Corridor and the overall Sound Transit system would compensate for and outweigh the negative impacts caused by OMF South.

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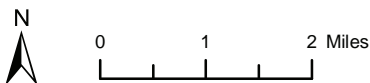
<sup>1</sup> In 2013, Sound Transit established policies for conducting equity analyses of Major Service Changes and Fare Changes impacting minority or low-income populations (R2013-18 and R2013-19). The 2021 FEA was prepared under those policies. In 2022, Sound Transit drafted a new policy R2022-19, that consolidated, updated, and replaced R2013-18 and R2013-19. This addendum has been prepared using R2022-19.



- ★ Midway Landfill Alternative
  - ★ South 336th Street Alternative
  - ★ South 344th Street Alternative
  - ◻ OMF South Study Area (0.5 mile)
  - ◻ Sound Transit District Boundary
  - ◻ South Corridor Boundary
  - Existing Station
  - FWLE Station
  - TDLE Station
  - Existing Link Light Rail
  - Federal Way Link Extension
  - Tacoma Dome Link Extension
  - ◻ Census Tract
  - % Minority > 42%
- \* Percent minority is 39% for the Sound Transit District*

Data Sources: King County; Cities of Kent, Des Moines, and Federal Way (2023); PSRC; U.S. Census Bureau (2020).

**FIGURE 1-1**  
Average Minority Population  
Sound Transit South Corridor



## 1.2 Purpose of the FEA Addendum

Several key changes have occurred since the publication of the 2021 State Environmental Policy Act (SEPA) Draft Environmental Impact Statement (EIS) and the FEA. This addendum addresses those changes:

- After considering the 2021 SEPA Draft EIS, the FEA, and the comments received, the Sound Transit Board of Directors identified the South 336th Street Alternative as the Preferred Alternative for further evaluation in the SEPA Final EIS (Motion M2021-81, December 2021).
- The design for the Preferred Alternative was advanced and modified in response to comments received during the 2021 SEPA Draft EIS comment period and additional engineering information and permitting requirements.
- A test track and maintenance road were added to the Preferred and South 344th Street alternatives to meet additional operational needs.
- The Federal Transit Administration (FTA) and Sound Transit determined the need for an EIS under the National Environmental Policy Act (NEPA) to support federal funding and approvals. Sound Transit published a NEPA Draft/SEPA Supplemental Draft EIS (herein the 2023 Draft EIS) on the proposed OMF South project in September 2023. Sound Transit is the project proponent and the SEPA lead agency. FTA is the NEPA lead agency.

FTA published a Notice of Intent to prepare a NEPA EIS in July 2023. Sound Transit and FTA published the 2023 Draft EIS in September 2023. These documents may be found on Sound Transit's Operations and Maintenance Facility South website at: <https://www.soundtransit.org/system-expansion/operations-maintenance-facility-south/documents>.

The key choice for the project involves the location of a light rail OMF in the South Corridor. The 2023 Draft EIS analyzes and documents the alternative sites' potential impacts to the natural and built environment and proposes ways to mitigate unavoidable impacts. The public had the opportunity to review and make formal comment on the 2023 Draft EIS during the 45-day public comment period.

FTA and Sound Transit will publish a Final EIS, which will respond to substantive comments on the 2021 SEPA Draft EIS and on the 2023 Draft EIS. The Final EIS will include an evaluation of impacts and proposed mitigation for the Preferred Alternative and other alternatives. After completion of the Final EIS, the Sound Transit Board will select the project to be built. FTA will issue a Record of Decision, which will state FTA's decision on the project and list Sound Transit's mitigation commitments to reduce or avoid impacts.

## 2 PROJECT DESCRIPTION AND ALTERNATIVES

### 2.1 Project Description

Build alternatives evaluated in this addendum include the South 336th Street Alternative (the Preferred Alternative), the South 344th Street Alternative, and the Midway Landfill Alternative. The basic design and function of the OMF South site would be the same for all alternatives. The Preferred and South 344th Street alternatives continue to have two possible alignments for their mainline connection to the FWLE terminus, the 40 mph Alignment and 55 mph Design Option. The three build alternatives are shown in Figure 2-1. There has been no change to the No-Build Alternative or the Midway Landfill Alternative.

### 2.2 Description of Project Design Changes

Sound Transit published the OMF South FEA on November 10, 2021. The FEA analyzed the No-Build Alternative and three site alternatives.

Since publication of the 2021 FEA and the December 2021 Board action identifying the South 336th Street Alternative as the Preferred Alternative, Sound Transit has advanced the design, which has resulted in design updates. Project designs were advanced in response to comments received during the 2021 SEPA Draft EIS comment period, identification of additional operational needs, including the accommodation of a test track for new and rehabilitated light rail vehicles (LRVs), and coordination with the city of Federal Way. The number of anticipated OMF South employees for all three site alternatives has been updated to approximately 610 from approximately 480. The remainder of this section describes the changes specific to each alternative. More detail can be found in the 2023 Draft EIS.

#### 2.2.1 Preferred Alternative

Since publication of the 2021 FEA, the project design for the Preferred Alternative was advanced with several modifications. One modification to meet operational needs includes the addition of a third track parallel to the mainline tracks to serve as a dedicated test track to test new and rehabilitated LRVs to ensure their safety, compliance with Sound Transit's requirements, and readiness to carry passengers. This change was also applied to the South 344th Street Alternative, described below.

The test track would run east of and parallel to the mainline tracks from S 324th Street to just south of S 336th Street. This widens the permanent footprint of the mainline tracks from what was analyzed in the 2021 FEA by approximately 15 feet where the tracks are parallel and slightly wider at the ends of the test track. There would also be an access road that would parallel the mainline track and test track alignment through Belmor Mobile Home Park (Belmor), along with a test track facility building separate from the OMF South site. This 1,000-square-foot building would include a breakroom and facilities for employees working at the test track.

In addition to the test track, Sound Transit revised the site configuration for the Preferred Alternative to meet Federal Way requirements and local design standards and to address other developmental and operational needs.



The design of the Preferred Alternative has been updated to include the following:

- The main site entrance has been moved from State Route (SR) 99 to S 340th Street.
- 18th Place S has been extended to connect S 340th Street and S 336th Street as a replacement for the removal of 20th Avenue S. The extended street would include a bike/pedestrian trail to provide public amenities.
- 21st Avenue S has been extended to connect to S 344th Street.
- Frontage improvements (including road widening) have been added on the south side of S 336th Street to meet city requirements.
- The OMF South site has been expanded to the southwest to provide more space for buildings and yard area.
- The OMF South site and internal track configuration has been modified to a parallelogram to allow for a wider stream and wetland corridor on the east side of the OMF, between the site and Interstate 5 (I-5).
- Existing culverts that carry the West Fork Hylebos Creek Tributary under S 336th Street and the East Fork Hylebos Creek Tributary under S 344th Street are planned to be replaced.

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

The project design for the South 344th Street Alternatives was also advanced since the 2021 FEA, with the addition of a third track parallel to the mainline tracks to serve as a dedicated test track. The test track would be used to test new and rehabilitated LRVs to ensure their safety, compliance with Sound Transit's requirements, and readiness to carry passengers, and is the same as described above in Section 2.2.1, Preferred Alternative.

### **2.2.3 Midway Landfill Alternative**

The design for the Midway Landfill Alternative site was not modified from what was analyzed in the 2021 FEA. A test track adjacent to the Midway Landfill alternative would not be feasible because of the varying grades of the existing mainline tracks. Due to this, this analysis assumes LRV testing would continue on the mainline tracks with the Midway Landfill alternative.

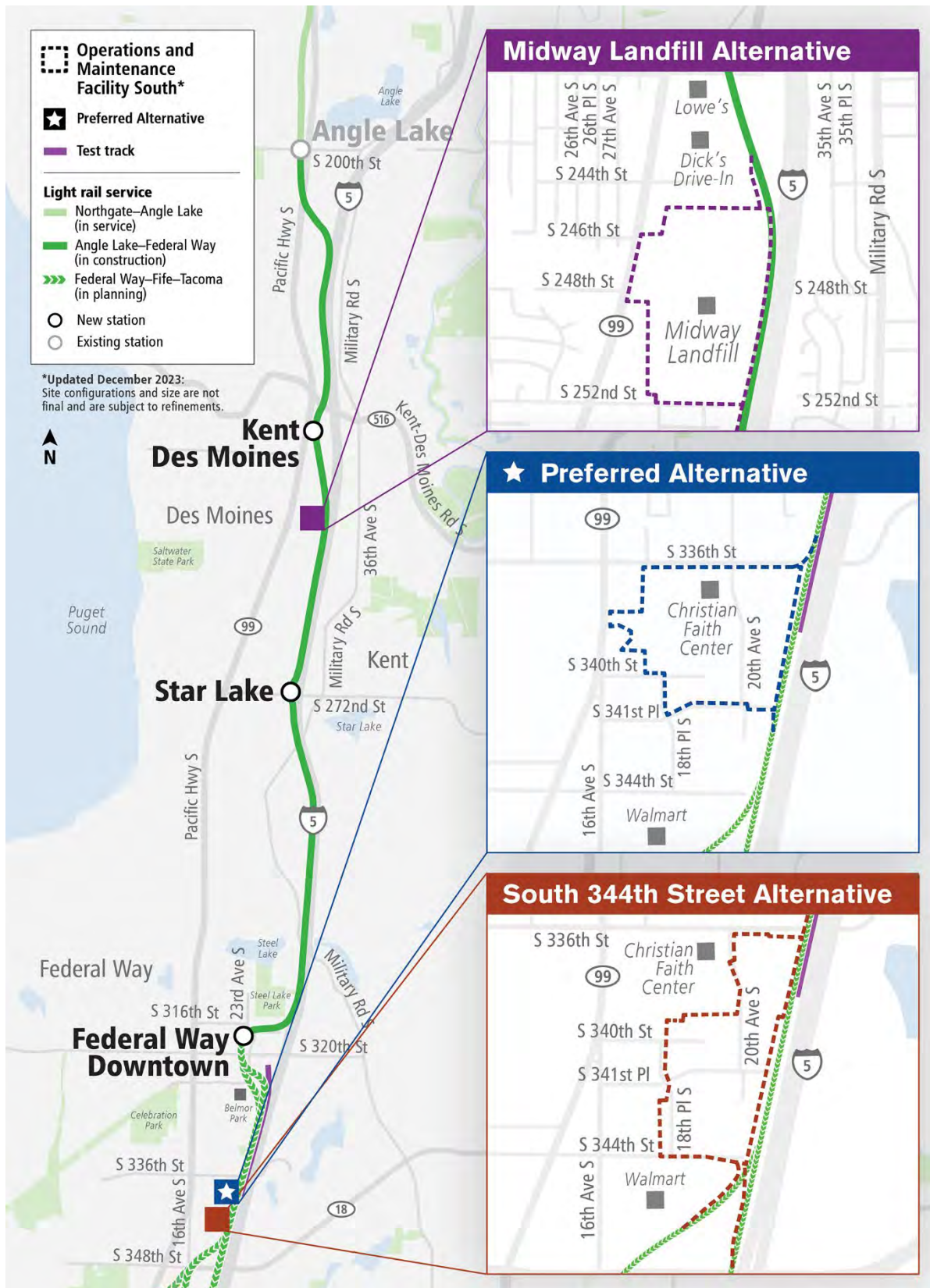


Figure 2-1 OMF South Alternatives

### 3 SITE ALTERNATIVE EQUITY ANALYSIS

#### 3.1 Demographics

This section describes the demographics in the Sound Transit service district, the South Corridor, and by site alternative. The purpose of these comparisons is to understand how the distribution and concentration of minority populations could be affected by each alternative and how they compare to the demographics of the Sound Transit service district. Consistent with the 2021 FEA, a disparate impact occurs when the percentage of the minority population adversely affected by a maintenance facility location exceeds the percentage of the minority population of the Sound Transit service district.

Table 3-1 provides an updated summary of demographics in the study areas and compares the population characteristics to those of the South Corridor and the Sound Transit service district. For the purposes of this analysis, the South Corridor is defined as a 1.5-mile buffer area around the Link light rail alignment from the terminus of the Central Link at Angle Lake to the terminus of the Tacoma Dome Link Extension at the Tacoma Dome. This is consistent with the area along the planned southern light rail alignment that was considered for possible location at OMF South. The Sound Transit service district comprises 53 cities in King, Pierce, and Snohomish counties and includes a population of approximately 3.2 million people. Figures 3-1, 3-2, and 3-3 show the minority populations in the vicinity of each of the study areas.

The South Corridor has a higher proportion of minority residents when compared to the entire Sound Transit service district, and all three site alternative study areas have higher proportions of minority persons than both the South Corridor and Sound Transit service district. The Midway Landfill Alternative study area has the highest percentage of minority persons of the three study areas, at 68 percent. The 2021 FEA used census data from 2014 to 2018 and showed lower populations and proportions of minority populations across all geographies.

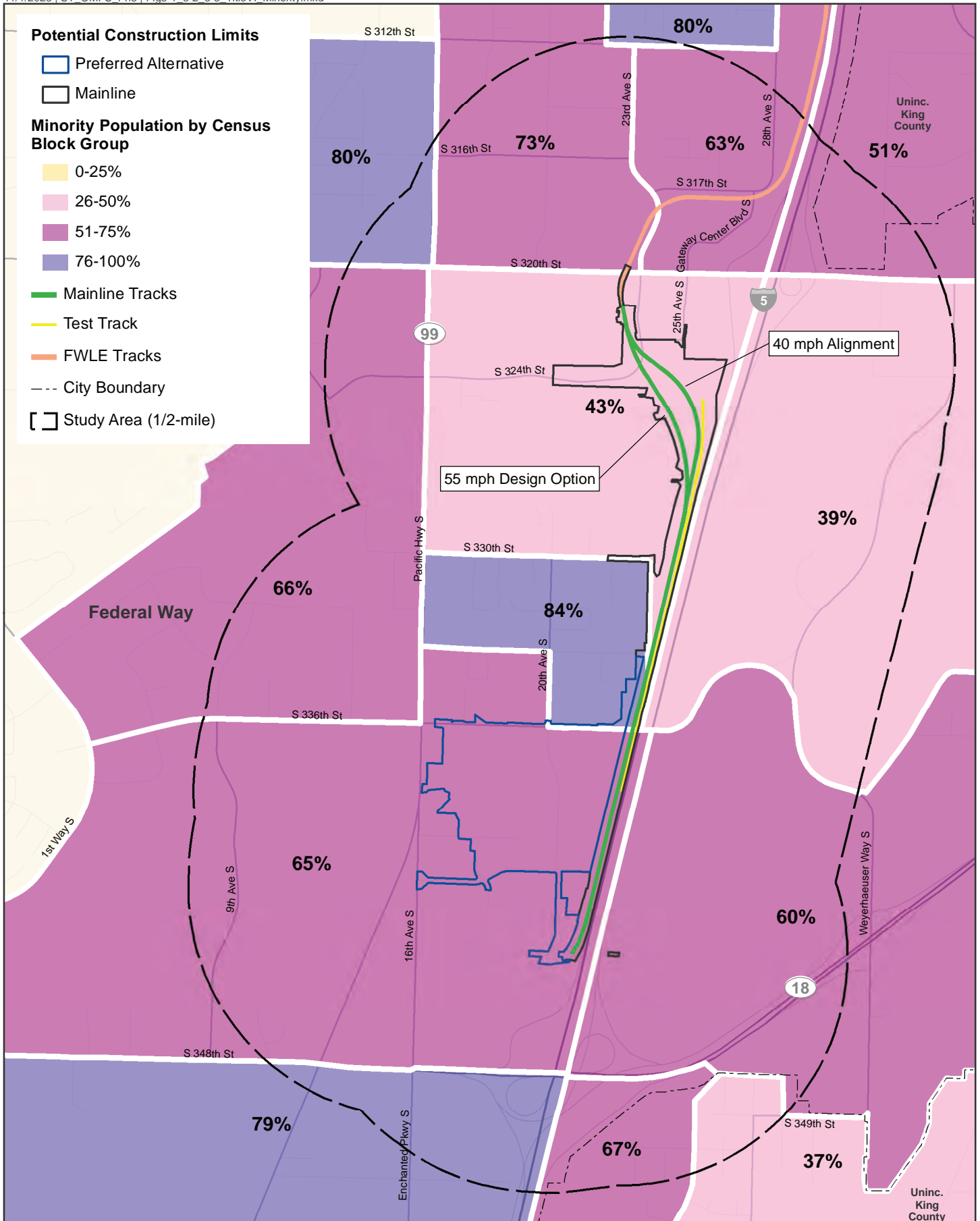
**Table 3-1 Demographic Characteristics**

	Preferred Alternative (South 336th Street)	South 344th Street Alternative	Midway Landfill Alternative	South Corridor	Sound Transit Service District
Total population	8,542	9,482	10,712	189,967	3,189,953
Minority population <sup>1,2</sup>	66%	66%	68%	54%	42%
Population reported in 2021 FEA	7,973	9,336	9,567	188,276	3,158,800
Minority population reported in 2021 FEA	61%	57%	65%	53%	39%

Source: U.S. Census Bureau, American Community Survey (ACS) 2016–2020 5-Year Estimates (Addendum data); U.S. Census Bureau, American Community Survey (ACS) 2014–2018 5-Year Estimates (2021 FEA data)

Notes:

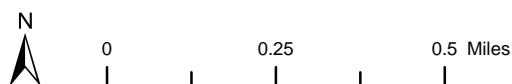
- (1) Minority is defined as all race/ethnicity groups except for “Non-Hispanic White Alone.”
- (2) Percentages represent estimates based on survey data. Survey data are not available at the census-block level; the data represents an estimate of minority and low-income persons in block groups within 0.5 mile of each build alternative.

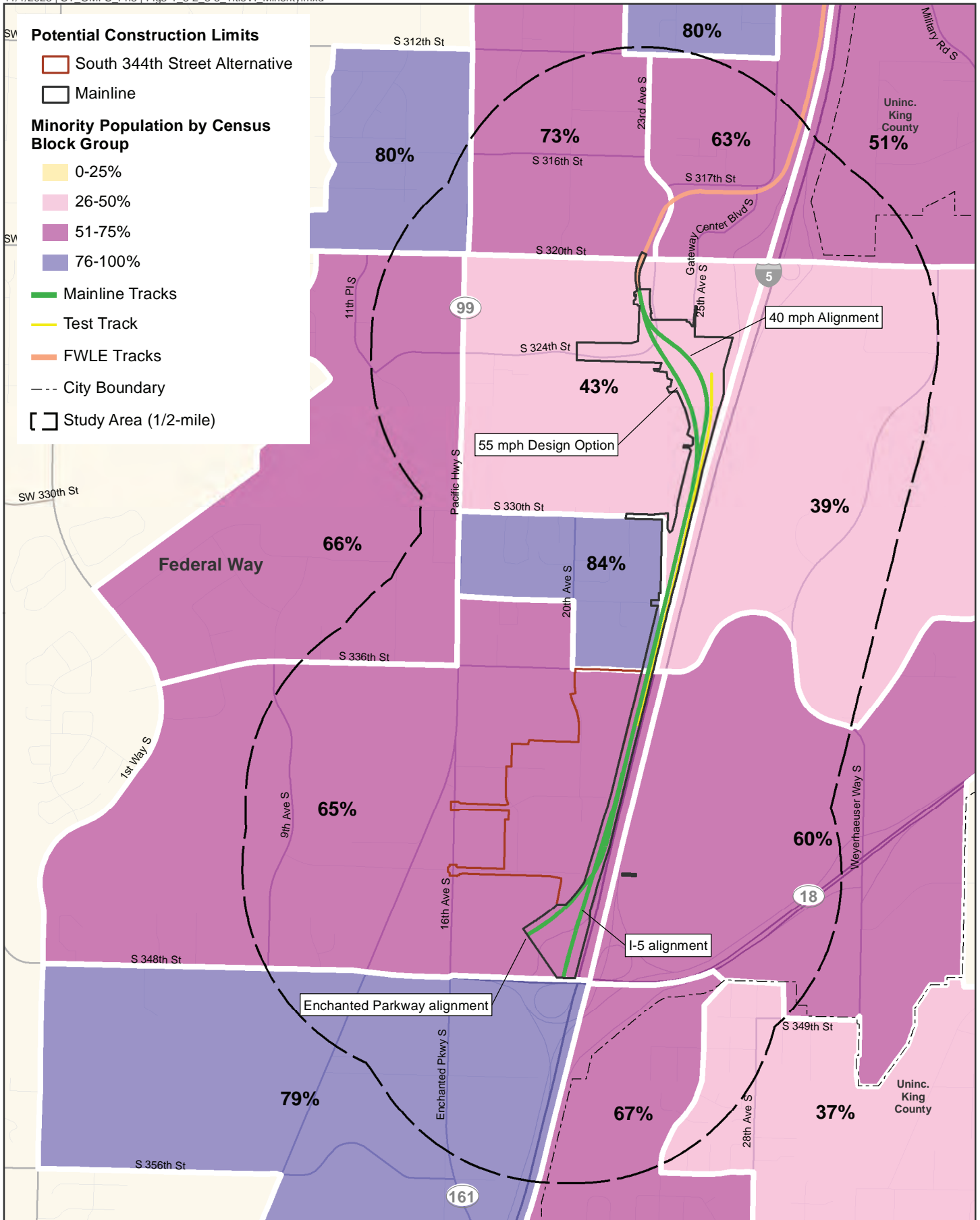


Data Sources: King County; Cities of Kent, Des Moines, and Federal Way (2023); U.S. Census Bureau (2020).

**FIGURE 3-1**  
Minority Populations  
Preferred Alternative

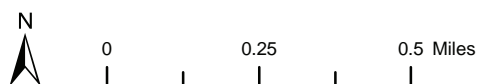
OMF South

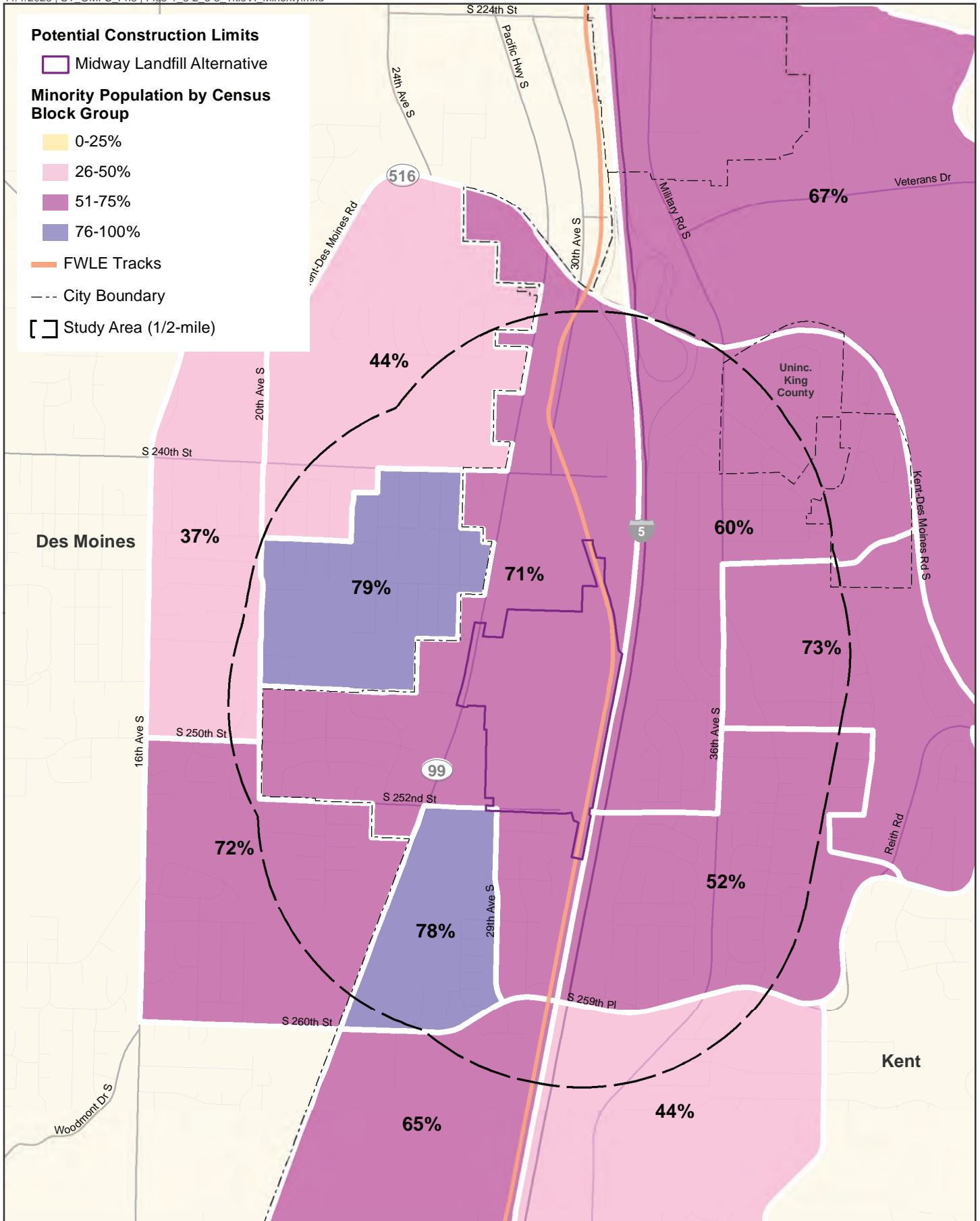




Data Sources: King County; Cities of Kent, Des Moines, and Federal Way (2023); U.S. Census Bureau (2020).

**FIGURE 3-2**  
 Minority Populations  
 South 344th Street Alternative





Data Sources: King County; Cities of Kent, Des Moines, and Federal Way (2023); U.S. Census Bureau (2020).

**FIGURE 3-3**  
Minority Populations  
Midway Landfill Alternative

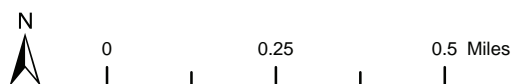


Figure 3-1 depicts the proportion of minority population, by block group, for the Preferred Alternative. Figure 3-2 depicts the proportion of minority population, by block group, for the South 344th Street Alternative. Figure 3-3 depicts the proportion of minority population, by block group, for the Midway Landfill Alternative.

All build alternatives are located within areas that have proportions of minority populations (ranging from 66 to 68 percent minority) that are higher than the proportion of minority populations present in the Sound Transit service district (42 percent minority). The minority population in the Sound Transit service district and in the different build alternative study areas increased since the initial FEA was published. The 2021 FEA used 2014–2018 census data that showed the Sound Transit service district was 39 percent minority, and the build alternative sites were 57 to 65 percent minority.

As described above, the definition of a disparate impact is one that “occurs when the minority percentage of the population adversely affected by a facility location is greater than the average minority percentage of the population of the Sound Transit service district.” Thus, each of the alternative locations has the potential to cause a disparate impact because the minority population of all three sites is greater than the minority percentage of the population of the Sound Transit service district average.

Because all alternative locations have minority populations greater than the Sound Transit service district average, the benefits and burdens from construction and operation of the OMF South Facility for all three sites have been reevaluated to determine adverse effects based on their changes from the original FEA.

### 3.2 Project Impacts and Changes from 2021 FEA

The OMF South 2023 Draft EIS disclosed detailed potential impacts associated with each of the build alternatives compared to the impacts associated with the No-Build Alternative. This section provides a summary of impacts and benefits from the build alternatives and highlights how they differ from those presented in the 2021 FEA.

Similar to the original FEA, the 2023 Draft EIS was reviewed to analyze and highlight the potential direct, indirect, and cumulative impacts from the OMF South Build Alternatives.

Table 3-2 summarizes the project burdens and benefits (potential direct, indirect, and cumulative impacts) for each of the three OMF South alternatives and identifies those impacts that are different from those evaluated in the 2021 FEA. The table focuses on impacts that differ between alternatives and have potential to affect minority populations disproportionately before mitigation and consideration of offsetting benefits. Project actions unlikely to impact minority populations or that are similar between all alternatives are not included in the table.

Changes in project impacts include additional right-of-way acquisition and displacements associated with the addition of a test track to the Preferred and South 344th Street Alternatives and changes to the site design for the Preferred Alternative (see Section 2.2 for a more detailed discussion of project design changes for each alternative). Project benefits include an increase in the number of anticipated jobs that OMF South will bring. The impacts and benefits are further discussed in Section 3.3, Disparate Impacts Analysis.

**Table 3-2 Summary of Project Burdens and Benefits Different from 2021 FEA**

Impacts	Preferred Alternative (South 336th Street) (2021)	Preferred Alternative (2023)	South 344th Street Alternative (2021)	South 344th Street Alternative (2023)	Midway Landfill Alternative (2021)	Midway Landfill Alternative (2023)
Transportation	Fewer than 80 truck trips per day during construction; no long-term impacts.	No change	Fewer than 80 truck trips per day during construction; no long-term impacts.	No change	Up to 564 round trip truck trips per day during construction, which could exacerbate congestion during peak travel times; operational impacts identified for S 246th Street/SR 99 intersection.	No change to construction impacts; operational changes identified for S 246th/SR 99 intersection are not considered impacts by City of Kent as it is a driveway intersection.
Parcels Affected	36	37	65	64	42	47
Business/Employee Displacements	2 businesses 94 employees	12 businesses 127 employees	12 businesses 248 employees	21 businesses 212 employees	4 businesses 43 employees	4 businesses 42 employees
Residential Displacements	61 – 73, depending on mainline alignment	86 – 92, depending on mainline alignment	67 – 79, depending on mainline alignment	91 – 97, depending on mainline alignment	0	No change
Noise (number of sensitive receptors impacted)	3 – 4, depending on mainline alignment	0 – 4, depending on mainline alignment; 1 attributable to traffic noise	3 – 4, depending on mainline alignment	0 – 4, depending on mainline alignment; 1 attributable to traffic noise	0	No change
Community and Social Resources	1 church and associated school and daycare center	1 church and associated school and daycare center; 1 in-home daycare center	3 churches	4 churches (2 churches share the same building)	0	No change
Hazardous Materials	No differentiating impacts	No change	No differentiating impacts	No change	Potential exposure to hazardous materials during removal and transport of fill materials.	No change



**Table 3-2 Summary of Project Burdens and Benefits Different from 2021 FEA (continued)**

Impacts	Preferred Alternative (South 336th Street) (2021)	Preferred Alternative (2023)	South 344th Street Alternative (2021)	South 344th Street Alternative (2023)	Midway Landfill Alternative (2021)	Midway Landfill Alternative (2023)
Cumulative Impacts	There are no facilities of similar size and operation in proximity to OMF South; however, smaller facilities may contribute to cumulative impacts for traffic congestion and noise (see Figure 3-5).	No change	There are no facilities of similar size and operation in proximity to OMF South; however, smaller facilities may contribute to cumulative impacts for traffic congestion and noise (see Figure 3-5).	No change	There are no facilities of similar size and operation in proximity to OMF South; however, smaller facilities may contribute to cumulative impacts for traffic congestion and noise (see Figure 3-7).	No change
Impacts after Mitigation	Residential and business displacements would be mitigated through relocation assistance. Noise from mainline track operations would be below FTA impact thresholds with noise walls.	No change	Residential and business displacements would be mitigated through relocation assistance. Noise from mainline track operations would be below FTA impact thresholds with noise walls.	No change	Impacts from hazardous material excavation and transport would be reduced through best management practices. Construction traffic impacts could be managed but could result in extended construction duration. Business displacements would be mitigated through relocation assistance.	No change

**Table 3-2 Summary of Project Burdens and Benefits Different from 2021 FEA (continued)**

Impacts	Preferred Alternative (South 336th Street) (2021)	Preferred Alternative (2023)	South 344th Street Alternative (2021)	South 344th Street Alternative (2023)	Midway Landfill Alternative (2021)	Midway Landfill Alternative (2023)
Summary of Benefits	<p>Economic activity generated through construction activities and workers.</p> <p>Improved transit service and access to employment opportunities throughout Link system.</p> <p>Anticipated to result in approximately 480 jobs.</p> <p>Economic activity generated by OMF South employees.</p>	<p>Anticipated to result in approximately 610 jobs.</p>	<p>Economic activity generated through construction activities and workers.</p> <p>Improved transit service and access to employment opportunities throughout Link system.</p> <p>Anticipated to result in approximately 480 jobs.</p> <p>Economic activity generated by OMF South employees.</p>	<p>Anticipated to result in approximately 610 jobs.</p>	<p>Economic activity generated through construction activities and workers.</p> <p>Improved transit service and access to employment opportunities throughout Link system.</p> <p>Landfill site remediated.</p> <p>Anticipated to result in approximately 480 jobs.</p> <p>Economic activity generated by OMF South employees.</p>	<p>Anticipated to result in approximately 610 jobs.</p>

### 3.3 Disparate Impacts Analysis

The changes in the project design explained in Section 2.2, Description of Project Design Changes, do not change the conclusions drawn in the 2021 FEA. After considering the project's potential effects, mitigation, and avoidance measures and anticipated benefits to minority populations, OMF South would not result in disparate impacts to the communities around the Preferred, South 344th Street, or Midway Landfill alternatives.

Within the vicinity of each of the OMF South alternatives, there is a higher percentage of minority population than in the Sound Transit service district, and construction of OMF South at any of the alternative sites would result in localized temporary and long-term impacts. However, there would be mitigation for the impacts, and the benefits to the surrounding communities from improved transit service within the South Corridor would compensate for and outweigh the negative impacts caused by OMF South.

The analysis for each site based on the changes in project impacts, benefits, and mitigation from the 2021 FEA is presented below.

#### 3.3.1 Preferred Alternative

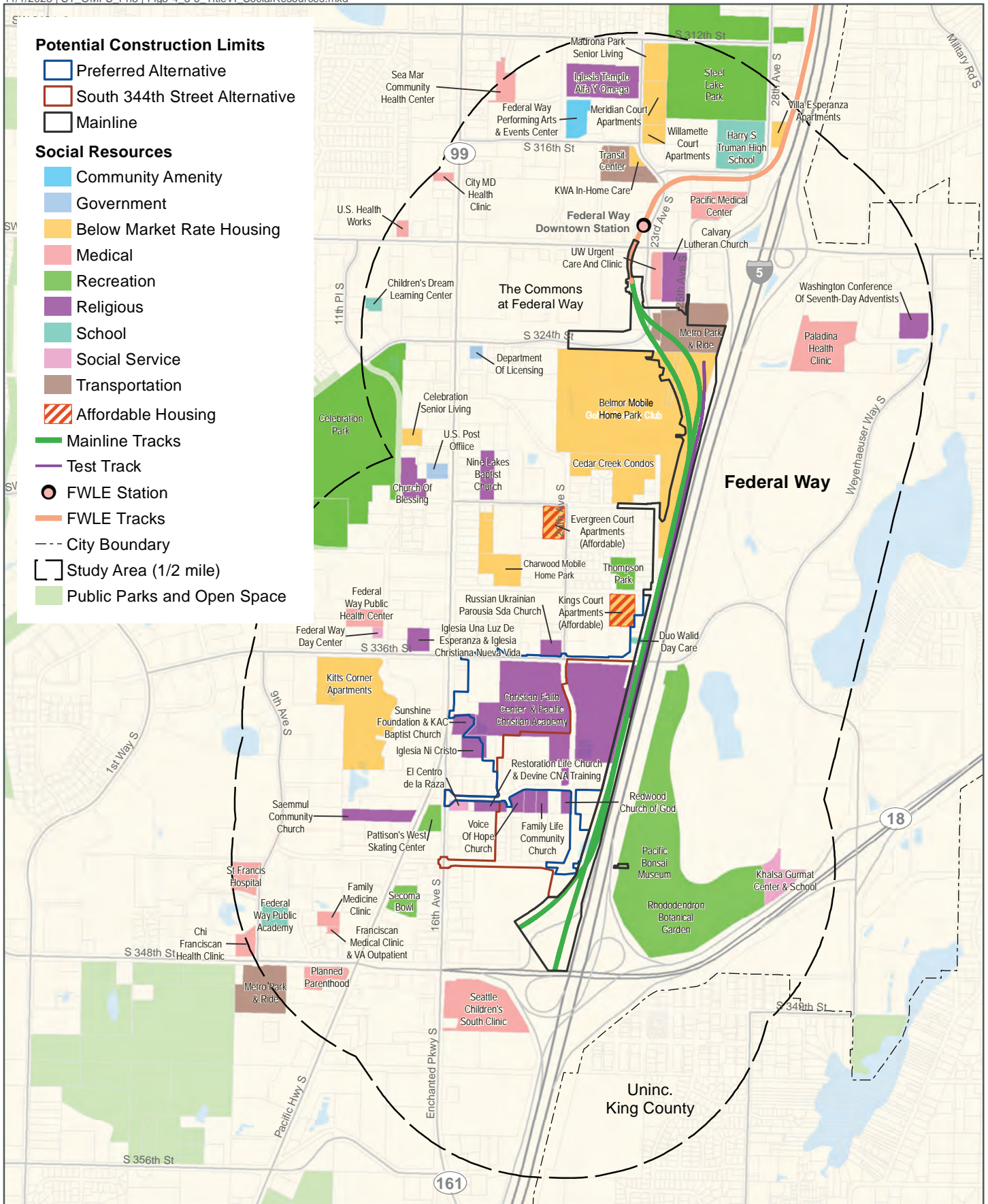
The Preferred Alternative has more residential and business displacements, including impacts to social and community resources, than described in the 2021 FEA (see Table 3-2 and Figure 3-4). To mitigate for the potential impacts due to displacements and relocations, as described in the 2021 FEA, residents and businesses displaced by the project would receive compensation and relocation assistance in accordance with federal and state relocation requirements as well as Sound Transit's Real Property Acquisition and Relocation Policy, Procedures, and Guidelines (Sound Transit 2017).

The Preferred Alternative would result in noise impacts for up to four residents due to operations of the light rail vehicles along the 55 mph Design Option for the mainline. These impacts would be mitigated through the construction of a noise wall, which would eliminate any noise impacts to those residents. There would be no noise impacts along the mainline anticipated for the 40 mph Alignment. In addition, there would be noise impacts for about one to three residences due to modifications of the existing noise wall and berm adjacent to I-5 for construction of the mainline.

Sound Transit would provide traffic noise mitigation measures where traffic noise levels are predicted to be above the 2042 No-Build levels due to the removal of the existing WSDOT berm and noise wall. Mitigation would be designed to maintain 2042 No-Build levels and could include replacement of noise walls and berms. Sound Transit would conduct additional noise analysis during final design in coordination with WSDOT to confirm whether noise mitigation is needed.

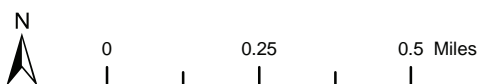
All other impacts would be the same as described in the 2021 FEA. Figure 3-4 and Figure 3-5 have been updated to reflect the new project footprint and current social and community resource services within the Preferred and South 344th Street alternative study areas and facilities near the sites, respectively.

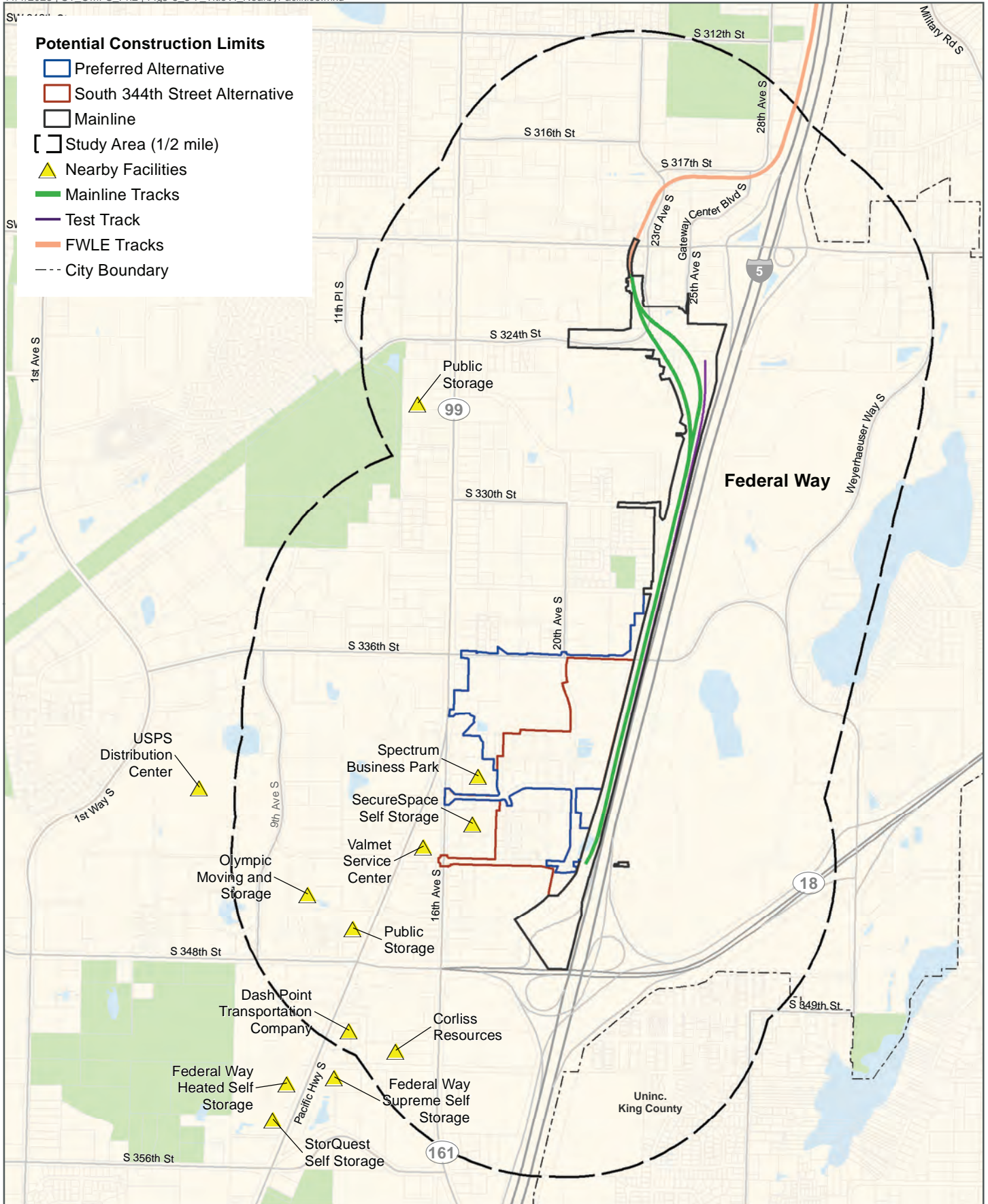
An updated benefit of the project is that it would now create approximately 610 high-skilled, living-wage jobs in south King County. The previous analysis estimated that approximately 480 jobs would be created.



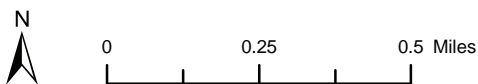
Data Sources: King County; Cities of Kent, Des Moines, and Federal Way (2023).

**FIGURE 3-4**  
**Social Resources**  
**Preferred and South 344th Street Alternatives**  
 OMF South





Data Sources: King County; Cities of Kent, Des Moines, and Federal Way (2023).



**FIGURE 3-5**  
 Location of Nearby Facilities  
 Preferred and South 344th Street Alternatives  
 OMF South

After consideration of the updated impacts, the Preferred Alternative would still not result in disparate impacts. There is a higher percentage of minority population in the vicinity of the site than in the Sound Transit service district, and there would be localized negative impacts. However, there would be mitigation for negative impacts, as summarized above, and overall, the improvement in transit service in the South Corridor would compensate for the negative impacts and result in benefits for the community as a whole.

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

Similar to the Preferred Alternative, the South 344th Street Alternative has more residential displacements, including to an additional social and community resource, than described in the 2021 FEA (see Table 3-2 and Figure 3-4). Mitigation for the residents and businesses displaced by the project would be the same as described for the Preferred Alternative.

The South 344th Street Alternative would also result in noise impacts for up to four residences due to operations of the light rail vehicles along the 55 mph Design Option for the mainline. These impacts would be mitigated through the construction of a noise wall, which would eliminate any noise impacts to those residents. There would be no noise impacts along the mainline anticipated for the 40 mph Alignment. In addition, there would be noise impacts for about one to three residences due to modifications of the existing noise wall and berm adjacent to I-5 for construction of the mainline.

Sound Transit would provide traffic noise mitigation measures where traffic noise levels are predicted to be above the 2042 No-Build levels due to the removal of the existing WSDOT berm and noise wall. Mitigation would be designed to maintain 2042 No-Build levels and could include replacement of noise walls and berms. Sound Transit would conduct additional noise analysis during final design in coordination with WSDOT to confirm whether noise mitigation is needed.

All other impacts would be the same as described in the 2021 FEA. Figure 3-4 and Figure 3-5 have been updated to reflect the new project footprint and current social and community resource services within the Preferred and South 344th Street study areas and facilities near the sites, respectively.

An updated benefit of the project is that it would now create approximately 610 high-skilled, living wage jobs in south King County. The previous analysis estimated that approximately 480 jobs would be created.

After consideration of the updated impacts, the South 344th Street Alternative would not result in disparate impacts. There is a higher percentage of minority population in the vicinity of the site than in the Sound Transit service district, and there would be localized negative impacts. However, there would be mitigation for negative impacts, as summarized above, and overall, the improvement in transit service in the South Corridor would compensate for the negative impacts and result in benefits for the community as a whole.

### **3.3.3 Midway Landfill Alternative**

As summarized in Table 3-2, the impacts of the Midway Landfill Alternative are the same as described in the 2021 FEA, although the number of potentially affected parcels has risen due to nearby property parcels that have been subdivided through Sound Transit's Federal Way Link Extension project (there would still be no residential displacements, and the number of business

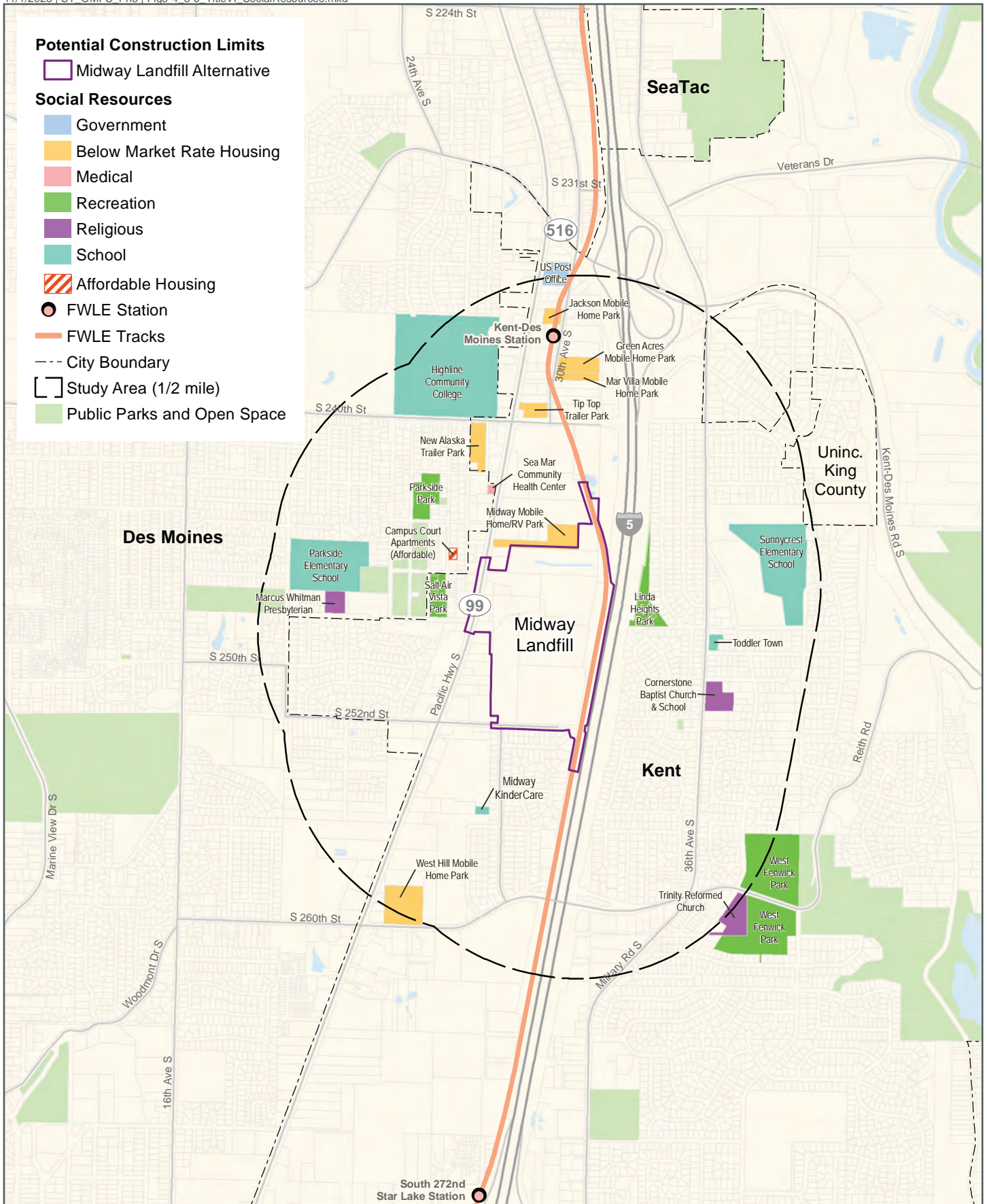
displacements would remain the same). Figure 3-6 has been checked and confirmed to still accurately reflect the current social and community resource services within the Midway Landfill Alternative Study Area, and Figure 3-7 has been checked and confirmed to reflect the current facilities near the site which are similar in nature to a maintenance facility (such as trucking companies and storage facilities). The social resources highlighted in Figure 3-6 include schools, parks, below-market-rate housing, medical clinics, and religious facilities, among others.

An updated benefit of the project is that it would now create approximately 610 high-skilled, living-wage jobs in south King County. The previous analysis estimated that approximately 480 jobs would be created.

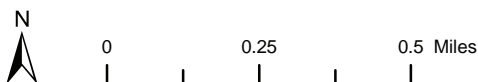
The Midway Landfill Alternative would not result in disparate impacts. There is a higher percentage of minority population in the vicinity of the site than in the Sound Transit service district, and there would be localized impacts. However, there would be mitigation for impacts, as summarized above,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

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

Impacts and benefits of the No-Build Alternative are the same as described in the 2021 FEA.



Data Sources: King County; Cities of Kent, Des Moines, and Federal Way (2023).

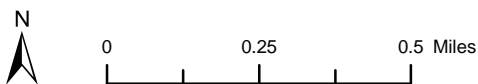


**FIGURE 3-6**  
**Social Resources**  
**Midway Landfill Alternative**  
*OMF South*





Data Sources: King County; Cities of Kent, Des Moines, and Federal Way (2023).



**FIGURE 3-7**  
**Location of Nearby Facilities**  
**Midway Landfill Alternative**  
*OMF South*

## 4 OUTREACH

This addendum describes outreach conducted after publication of the FEA in November 2021, including as part of the 2023 Draft EIS.

### 4.1 General Outreach After Publication of SEPA Draft EIS

Since the publication of the 2021 SEPA Draft EIS and identification of the Preferred Alternative, Sound Transit has held regular meetings with Federal Way, distributed updates to the project email list, and briefed other interested parties, including residential and commercial property owners and representatives from the Pacific Christian Academy, Belmor, and GarageTown.

Sound Transit is committed to equitable engagement and inclusive outreach towards community groups, organizations, residents, businesses, and underrepresented populations who do not typically participate in traditional in-person and online open houses or engagement opportunities. The project team has conducted targeted outreach to low-income, minority, and limited-English-proficiency populations to build long-term relationships and provide meaningful and accessible opportunities to engage in the project planning, design, and environmental review processes. Examples of targeted outreach since the 2021 SEPA Draft EIS include:

- A property-owner briefing with Spanish interpretation for a property owner who runs a daycare out of her residential home (February 2022).
- A resident briefing (March 2022) and two drop-in sessions (August 2023) for Belmor residents; the second drop-in included Korean interpretation per a resident request.
- A briefing with the Tacoma Urban League (May 2022).
- Other activities during the 2023 Draft EIS comment period (see next section).
- A briefing with the Korean-American Calvary Baptist Church (January 2024).

### 4.2 2023 NEPA Draft/SEPA Supplemental Draft Environmental Impact Statement Scoping

FTA and Sound Transit published a Notice of Intent in the Federal Register on July 19, 2023. The notice initiated a 30-day comment period where agencies, Tribes, and members of the public were invited to comment on the proposed scope of the EIS, particularly on changes made to the proposal since the 2021 SEPA Draft EIS. No comments were received from the public. The U.S. Environmental Protection Agency (EPA) requested that FTA make EPA a cooperating agency for the NEPA EIS.

### 4.3 2023 NEPA Draft / SEPA Supplemental Draft EIS Outreach Summary

The NEPA Draft/SEPA Supplemental Draft EIS 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. Sound Transit engaged in a broad public outreach process, including an online open house, virtual and in-person public hearings, and briefings for the potentially affected cities and other interested parties.

An online open house was available for the duration of the comment period to inform the public about the project and provide an opportunity to receive feedback using social media tools. The online open house was fully translated in English, Spanish, Korean, and Russian, which were identified as key languages in the project area. The website was also screen-reader accessible.

Between September 22 and November 6, 2023, over 1,300 visitors accessed the online open house. Visitors were given the opportunity to comment on the 2023 Draft EIS's findings using an embedded electronic comment form. A total of 23 people submitted comments via the online open house out of 58 total comments received on the Draft EIS.

During the comment period, online and in-person informational public hearings were held to share project information and obtain input from the community. A court reporter recorded spoken statements made during the public hearings. The hearings were:

- Online: Thursday, October 19, 11:30 a.m. to 1:30 p.m. (the event could be accessed through a Zoom link provided on the online open house)
- In person: Tuesday, October 24, 5:30 to 7:30 p.m. at the Federal Way Performing Arts Center

Both hearings utilized standard accessibility features. The online hearing featured live captioning (in English) and was screen-reader accessible. Sound Transit offered simultaneous interpretation in American Sign Language, Spanish, Korean, and Russian at the online and in-person hearings. The in-person hearing also included translated materials in Spanish, Korean, and Russian. Sound Transit staff communicated the language and accessibility features throughout the public hearings to ensure attendees understood how to fully participate. Languages available for interpretation were based on the demographic data of the study area.

Public engagement for the comment period also included:

- A mailer to 5,200 homes, apartments, and businesses within a half-mile of the OMF South alternative sites advertising the comment period, details of how to comment (online, email, letter, voicemail, or public meeting), the online open house, and the public hearings. The mailer included translations in Spanish, Korean, and Russian.
- Print display ads and online ad campaigns in six publications. Ad placements included English, Spanish, Korean, and Russian publications to reach audiences in the project area and region. Online ads were geo-targeted, when possible, to focus on audiences in Kent and Federal Way.
- Distribution of posters to eight community gathering spaces (such as libraries and community centers) and other areas where the public is likely to congregate in Kent and Federal Way. The poster included translations in Spanish, Korean, and Russian.
- Legal notices, a news release, and three update notices to an email list with approximately 4,800 subscribers. Email updates on the OMF South project are provided in English. At the bottom of every email are translated links to the translation services webpage where readers can request information in their language.
- Posts on Sound Transit's Facebook page, reaching 224 people.
- Distribution of outreach toolkits with information about the comment period and how to participate to the Multi-Service Center, Federal Way Black Collective, City of Federal Way, and Federal Way Chamber of Commerce so that they could help share information to local audiences.
- Briefings with the cities of Kent and Federal Way, the OMF South Interagency Group, GarageTown, and Belmor residents (which drew 59 attendees).

## 5 CONCLUSION

This FEA Addendum evaluates the changes to each of the build alternatives and summarizes the impacts, benefits, and mitigation associated with each option. Based on this analysis, which is prepared under Board Resolution R2022-19, the conclusion from the 2021 FEA is unchanged and is presented below.

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

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

1. The population and impacts within the vicinity of each build alternative are analyzed and compared to the Sound Transit service district to determine whether the location of alternatives could result in a disparate impact.
2. Potential disproportionate direct and indirect impacts to minority populations are described, with the consideration of mitigation and offsetting benefits. If disparate impacts are found, then a project may only proceed in a given location if there is a substantial legitimate justification for locating the project there and the location is the least discriminatory alternative.

OMF South would not result in disparate impacts to the communities around the Preferred, South 344th Street, or Midway Landfill alternatives. This conclusion is consistent with the findings of the 2021 FEA. Within the vicinity of each of the OMF South alternatives, there is a higher percentage of minority population than in the Sound Transit service district, and construction of OMF South at any of the alternative sites would result in localized temporary and long-term impacts. However, there would be mitigation for the impacts as summarized in Section 3.3, Disparate Impacts Analysis, and the benefits to the surrounding communities from improved transit service in the South Corridor, as well as throughout the entire system, would compensate for and outweigh the negative impacts caused by OMF South.

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

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

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