



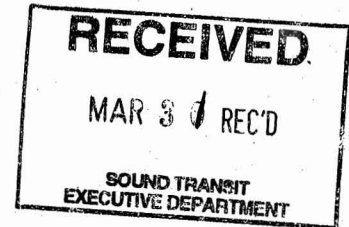
U.S. Department
of Transportation
**Federal Transit
Administration**

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March 26, 2009

Joni Earl
Executive Director
Sound Transit
401 South Jackson St.
Seattle, WA 98104-2826



Re: Tukwila Commuter Rail Station Project
Finding of No Significant Impact (FONSI)

Dear Ms. Earl:

The Federal Transit Administration (FTA) has completed its review of the NEPA Environmental Assessment (EA), January 2009, for the Tukwila Commuter Rail Station Project. Based on our review, FTA has issued a Finding of No Significant Impact (FONSI) for the project. A copy of the FONSI is enclosed.

The FONSI, EA, and all related supporting materials should be made available to the public, with notice of availability published in one or more newspapers of general circulation. Notice of the FONSI's availability should also be sent to the agencies on the EA circulation list. Please note that if a construction grant is approved for this project, the standard terms and conditions of the FTA grant contract will require the grantee to undertake all environmental mitigation measures identified in Appendix B of the FONSI.

Thank you for complying with the National Environmental Policy Act. Please contact John Witmer at (206) 220-7964 if you have any questions.

Sincerely,

R.F. Krochalis
Regional Administrator

Enclosure

CC: Steve Kennedy, ST
Paul Cornish, ST

Tukwila Commuter Rail Station Project

Finding of No Significant Impact (FONSI)

And Other Determinations of Environmental Compliance

March 2009

Issuing Agency

Federal Transit Administration

Prepared in compliance with the National Environmental Policy Act (NEPA) 42 USC §4321) and FTA Environmental Impact and Related Procedures (49 CFR §622) and related guidance; and Council on Environmental Quality (40 CFR parts 2500-1508) and related amendments and Executive Orders.



**Tukwila Commuter Rail Station Project
Tukwila, King County, Washington**

Finding of No Significant Impact

By the

U.S. Department of Transportation

Federal Transit Administration

The Federal Transit Administration (FTA) has determined, in accordance with 23 CFR §771.121, that the proposed project will have no significant adverse impacts on the environment.

This Finding of No Significant Impact (FONSI) is based on the Environmental Assessment (EA), issued in January 2009 and incorporated by reference, other documents and attachments as itemized in this FONSI and the findings herein. The EA and these other documents have been independently evaluated by the FTA and determined to accurately discuss the project purpose, need, environmental issues, impacts of the proposed project, and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required.



R. F. Krochalis
Regional Administrator, Federal Transit Administration

Date 3/27/09

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**FEDERAL TRANSIT ADMINISTRATION
REGION 10**

**FEDERAL TRANSIT ADMINISTRATION
WASHINGTON DIVISION**

**Finding of No Significant Impact
and Other Determinations of Environmental Compliance**

**Tukwila Commuter Rail Project
Sound Transit
Tukwila, King County, Washington**

Proposed Project

Sound Transit is proposing to replace a temporary Sounder commuter rail station in Tukwila, Washington with a permanent station known as the Tukwila Commuter Rail Station Project (the project). The project is located south of Interstate 405 (I-405) and east of State Route (SR) 181 (West Valley Highway), on undeveloped land extending from the east margin of the Burlington Northern Santa Fe (BNSF) right-of-way (ROW) to the west margin of the Union Pacific Railroad (UPRR) ROW. The north end of the proposed station platforms would be approximately 700 feet south of Longacres Way (a private road), and the south end of the site would be near the planned eastward extension of Strander Boulevard, as proposed by the City of Renton. The site fronts on Longacres Way, with approximately 500 linear feet of frontage including the BNSF and UPRR ROWs.

The project is part of *Sound Move*, Sound Transit's 10-year Regional Transit Plan, and was evaluated in a 1998 Environmental Assessment. The need for the January 2009 Environmental Assessment is the result of design changes made to better accommodate future rail and traffic needs of the area. Specifically, changes from the previous Environmental Assessment include accommodating the UPRR Realignment Project proposed by the City of Renton, reducing parking needs, and locating the station platforms approximately 700 feet further south. The proposed changes to the design of the permanent station were made in response to a better understanding of the expected use of this station, made possible by operating a temporary platform at the site for several years, as well as the completion of planning for the Strander Boulevard Extension and UPRR Realignment projects proposed by the City of Renton.

The proposed station would replace the temporary station, which includes minimal commuter amenities and is located adjacent to the north and east of the project site. Parking for up to 222 vehicles is provided at the temporary station. The existing Tukwila Commuter Rail Station was built as a temporary station in order to provide service to the

area while planning for a permanent station could proceed. The temporary station is nearing the end of its anticipated lifespan, and was not built to accommodate future ridership levels. As part of the Tacoma-to-Seattle Commuter Rail Project, a permanent station with new parking, bus, ticketing and other facilities will be built on the west side of the BNSF tracks, west and south of the temporary station. Construction of the Tukwila Commuter Rail Station is expected to begin in 2010 and be completed by 2011.

The proposed project includes the following components:

- **350-Space Parking Facility.** The parking area would be located west of the proposed station platforms at the south end of the site and north of the proposed Strander Boulevard extension. The parking facility would provide surface parking for up to 350 vehicles. An additional area is included in the site plan for another 40 parking spaces for potential Amtrak use. These parking spaces, while not a part of the Sound Transit project, could potentially be constructed at a future time if Amtrak desires to proceed with these improvements, and adequate funding is secured. The proposed parking lot for the 350 spaces would be approximately 700 feet long by 200 feet wide, and would connect to Longacres Way via the Western Access Road on the northwest side of the lot. The area for the potential future Amtrak parking spaces would be approximately 110 feet long by 40 feet wide. The existing parking lot, which has been leased from the Boeing Company, will remain but will not be part of the station parking.
- **Station Platforms.** The proposed platforms for the Tukwila Commuter Rail Station would be consistent with future plans for all Tacoma-to-Seattle Sounder stations, and sufficient to accommodate the projected needs of both Sounder and Amtrak. The current design includes two 16-foot platforms of up to 700 feet in length, located at the south end of the site on the east and west sides of the BNSF tracks. Platforms would be constructed to accommodate people with disabilities, similar to other Sounder stations, with “mini-high” platforms that are designed to ease access to passenger trains while still accommodating the need for freight trains to pass through the station unobstructed. The platforms of the existing temporary station would be removed after the permanent station is completed.
- **Transit and Non-vehicular Access.** Bus transit service would be accommodated by transit-only lanes, and a boarding and layover zone that would include a waiting shelter. Pedestrian amenities would include sidewalks leading to all parts of the station and parking lot, wheelchair-accessible ramps connecting between the platforms and ground-level facilities, and a pedestrian underpass connecting the parking lot and the station platforms. (The portion of the pedestrian way that passes under the UPRR tracks would be constructed as part of the UPRR Realignment Project.) Bicycles would use surface streets or sidewalks to arrive at the site along the same routes as vehicles, primarily from Longacres Way. In addition to the Western Access Road, there would be a 12-foot wide path for non-motorized vehicles and pedestrians connecting the station to Longacres Way. It is approximately 250 feet from the Interurban Trail (a multi-purpose path for non-motorized travel) to the proposed Western Access Road along Longacres Way, and an additional 150 feet to

the multipurpose path. The frontage on Longacres Way would also be improved with sidewalks and street trees per City of Tukwila requirements.

- Vehicular Access. Vehicle access to the station would be via the Western Access Road, which would connect to Longacres Way. Currently, access to the temporary Tukwila Commuter Rail Station is via Longacres Way. Vehicles pass under both the UPRR and BNSF tracks to arrive at the parking area, which is located east of the BNSF tracks. Under the proposed plan, Longacres ways would still pass under the railroad tracks, but most vehicles arriving at the site would likely arrive from the west and would not have to cross under any tracks to arrive at the station, since the UPRR tracks are anticipated to have been relocated by the start of station operation.
- Stormwater Treatment and Detention Facility. A stormwater treatment and detention facility is proposed to be located at the north end of the parking lot.
- Amenities. The project includes a broad plaza crossing the parking lot east to west at its midpoint. Other features and amenities would include ticket vending machines, bicycle lockers and racks, seating, informational and wayfinding signs, a guard station, and public art. Although Amtrak is not a sponsor of this project, the design evaluated in the January 2009 Environmental Assessment is intended to accommodate potential future Amtrak parking and facilities associated with the Tukwila Commuter Rail Station project. Anticipated elements for Amtrak's use of the site in the future, including long-term parking, lighting, shelter, and ticketing facilities, are evaluated in the January 2009 NEPA Environmental Assessment.
- Future Development. Potential future development at the site could include the potential additional 40 layover and/or overnight parking stalls for Amtrak customers, pedestrian connections to both the West Valley Highway and the Interurban Trail, and a street connection to the planned eastward extension of Strander Boulevard. These improvements are not a part of the proposed Sound Transit project. Because funding for these elements is uncertain, there is no schedule available at this time for their completion.

Project Development, Agency Coordination and Public Opportunity to Comment

A Technical Advisory Committee (TAC) was formed to facilitate a collaborative effort between stakeholders and Sound Transit during the *Preferred Alternatives Analysis and Project Sequencing* design phase. The TAC included representatives from City of Tukwila, City of Renton, King County Metro (Metro Transit), Washington State Department of Transportation (WSDOT), and Amtrak.

In addition to these key stakeholders, significant input to the process was received from BNSF, UPRR, Amtrak, and Boeing. Additional coordination meetings were held with the major utilities within the project site. An Executive Advisory Committee (EAC) was formed to advise Sound Transit, the TAC, participating agencies, and the design team. EAC members included Peter Hahn, the City of Renton; Jack Pace, the City of Tukwila;

and Vicki Youngs, Sound Transit. The EAC was merged with the TAC during the 30% design phase. The TAC/EAC process is described in detail in Section 5.5 of the EA.

In addition, Sound Transit has attended and presented information in Tukwila during several public meetings regarding improvements at the existing Tukwila Station, including the following:

- December 3, 2007 and December 10, 2007 - meetings with Tukwila City Council about the temporary station and updates on the permanent station.
- June 3, 2008 - meeting with Tukwila Art Commission regarding public art at the temporary station and a status report on the permanent station.

A public open house on the Tukwila Commuter Rail Station project and NEPA Environmental Assessment was held January 29, 2009.

Tribal involvement included mailing a "notice of undertaking" letter for the Tukwila Commuter Rail Station Project on September 3, 2008 to the following tribes: Confederated Tribe of the Colville Reservation, Duwamish Tribe, Muckleshoot Indian Tribe of the Muckleshoot, Puyallup Tribe of the Puyallup Reservation, Snoqualmie Tribe, and Confederated Tribes and Bands of the Yakama. The letter also included a request to tribes about their interest in further consultation. To date, the only response from tribes has been from Karen Walter of the Muckleshoot Indian Tribe Fisheries Division. FTA and Sound Transit sent Ms. Walter information in December 2008 on the project regarding biological/wetlands and water resources impacts and proposed mitigation. A copy of the NEPA EA was sent to each of these tribes to provide further opportunity to comment.

In addition, Sound Transit consulted with the Washington State Department of Archaeology and Historic Preservation on potential impacts to cultural and historic resources.

Section 5.3 in the EA further describes Agency and public coordination.

Comments on the EA

Sound Transit received three written comment e-mails and letters in response to the EA, including comments from the Muckleshoot Tribe, Puget Sound Energy, and a joint letter from the Cities of Tukwila and Renton.

Approximately 23 people attended the January 29, 2009 EA Public Open House. None of those attending provided written or formal oral comments on the EA. Several supportive statements were made informally, and several individuals asked clarifying questions about the plans and the design process that can be expected.

Responses were prepared to all written comments and are included as Appendix A of the FONSI. The project-related issues identified in the comments included the following topics:

- Impacts to wetlands and fish habitat
- Utility impacts and access for maintenance
- Parking demand and potential mitigation
- Construction traffic impacts on roads
- Off-site amenities (sidewalks, lighting, drainage, landscaping and roadway upgrades)
- Bike and pedestrian safety
- Compliance with noise regulations
- Safety and security
- Public restrooms
- Compatibility with planned and future land uses
- Hazardous materials
- Access to the site from the east (Renton)

Mitigation Measures to Minimize Harm

Appendix C describes the mitigation measures that are required of Sound Transit as conditions of this FONSI. These mitigation commitments are based on the potential mitigation measures identified in the EA and the mitigation measures required for compliance under the Endangered Species Act. FTA finds that with the accomplishment of these mitigation commitments, Sound Transit will have taken all reasonable, prudent, and feasible means to avoid or minimize significant impacts, if any, from the proposed action.

Determination and Findings

National Environmental Policy Act (NEPA) Finding

FTA served as the lead agency under NEPA for this project. Sound Transit prepared the EA in compliance with NEPA, 42 U.S.C Sections 4321 et. seq., and with FTA's regulations, 23 CFR Part 771. FTA has made an independent evaluation of the EA. The EA discusses the potential impacts of the project so that FTA can determine whether significant adverse impacts (CEQ §1508.27) are probable. If such a determination were made, an Environmental Impact Statement would need to be prepared.

Sound Transit has incorporated environmental considerations into its study of project alternatives and has conducted evaluations of the project's potential environmental impacts. The EA was issued in January 2009. The EA found that the project's construction and operation would cause no significant adverse environmental effects that would not be mitigated. This finding applies to all applicable environmental elements, including Land Use, Transportation, Social and Economic Impacts, Biological Resources, Water Quality and Hydrology, Vibration and Noise, Air Quality, Historic and

Archeological and Cultural Resources, Visual Quality and Aesthetics, Geology and Soils, Utilities and Public Services, Safety and Security, Energy, and Hazardous Materials.

After carefully considering the EA, its supporting documents, and the public comments and responses, **FTA finds under 23 CFR §771.121 that the development and operation of the proposed project, with the mitigation to which Sound Transit has committed to implement as part of the project, will have no significant adverse impacts on the environment.** The record provides sufficient evidence and analysis for determining that an environmental impact statement is not required.

Section 106 Compliance

Section 106 of the National Historic Preservation Act of 1966, as amended, requires the review of federally assisted projects for impacts to districts, sites, buildings, structures, and objects listed in, or eligible for inclusion in, the National Register of Historic Places. Federal agencies must coordinate with the State Historic Preservation Office (SHPO) and potentially affected tribes to make this determination. The Advisory Council on Historic Preservation has established procedures for the protection of historic and cultural properties in, or eligible for, the National Register (36 CFR Part 800).

No potentially significant resources were identified during field reconnaissance and no archaeological sites have been recorded within the project site area. No existing structures of historic significance would be affected by the project. Records at the Washington State Department of Archaeology and Historic Preservation (DAHP) were reviewed on July 31, 2008 to determine proximity of archaeological or cultural resources eligible for listing in the National Register of Historic Places (NRHP) within the project Area of Potential Effect (APE). No resources were identified.

As part of early coordination and Section 106 consultation with tribes, written contact was made with the Confederated Tribe of the Colville Reservation, Duwamish Tribe, Muckleshoot Indian Tribe, Puyallup Tribe of the Puyallup Reservation, Snoqualmie Tribe, and Confederated Tribes and Bands of the Yakama. None of the tribes expressed any concerns about cultural resources.

In addition to consultation with potentially affected tribes, FTA coordinated and consulted with the DAHP under Section 106 of the National Historic Preservation Act. In Washington State, DAHP serves as the SHPO. On November 25, 2008 a letter was sent to DAHP from FTA requesting concurrence with FTA's determination that no historic properties or cultural resources would be affected by the project. On December 10, 2008, FTA received a letter from DAHP concurring with the conclusion that the project would have no effect on historic or cultural resources listed in or eligible for listing in the National Register of Historic Places. DAHP agreed with measures proposed by Sound Transit to protect any potential undiscovered cultural resources by having a professional archaeologist on-site to monitor excavations, and preparation of an inadvertent discovery plan prior to construction.

Based on the cultural resources analysis included in the Environmental Assessment and coordination with tribes and DAHP, **FTA finds that the project will have no adverse effect on any identified or likely cultural or historic resources, and that the Section 106 consultation requirements for this project have been fulfilled.**

Section 4(f) Findings

Section 4(f) of the United States Department of Transportation (USDOT) Act of 1966, codified at 49 U.S.C. §303, declares a national policy that a special effort should be made to preserve the natural beauty of the countryside, public park and recreational lands, wildlife and waterfowl refuges, and historic sites. The Secretary of Transportation may not approve transportation projects that require the use of publicly owned land of a public park, recreation area, or wildlife or waterfowl refuge of national, state or local significance, or land of an historic site of national, state or local significance (as determined by the Federal, State or local officials having jurisdiction over the park, area, refuge or site) unless a determination is made that: (i) there is no feasible and prudent alternative to the use of the land; and (ii) the action includes all possible planning to minimize harm to the property resulting from such use (23 CFR §771.135).

The existence of potential Section 4(f) resources was evaluated as part of the EA. **FTA finds that the proposed project will not use or significantly impact any park, recreational, or other resources protected by Section 4(f) of the USDOT Act of 1966.**

Endangered Species Act Findings

The Endangered Species Act of 1973 (ESA), as amended, is intended to protect threatened and endangered species and the ecosystems on which they depend. The ESA requires a federal agency to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of any listed species or result in direct mortality or destruction or adverse modification of critical habitat of listed species. This requirement is fulfilled under Section 7 of the ESA by a review of the proposed actions and consultation with the appropriate agency responsible for the conservation of the affected species. If necessary, mitigation would be required to avoid jeopardizing listed species or their habitat.

Both the National Marine Fisheries Service (NMFS) and the US Fish and Wildlife Service (USFWS) provided listings of threatened and endangered species under their jurisdiction (see enclosed lists). The current listings from NMFS indicate the potential presence of the Puget Sound Evolutionary Significant Unit (ESU) of Chinook salmon (*Oncorhynchus tshawytscha*) and Puget Sound Distinct Population Segment (DPS) steelhead (*Oncorhynchus mykiss*) within the project area. Additionally, the USFWS lists Coastal/Puget Sound DPS bull trout (*Salvelinus confluentus*), marbled murrelet (*Brachyramphus marmoratus*), northern spotted owl (*Strix occidentalis caurina*), gray wolf (*Canis lupus*), grizzly bear (*Ursus horribilis*), Canada lynx (*Lynx canadensis*), marsh sandwort (*Arenaria paludicola*) and golden paintbrush (*Castilleja levisecta*) as having the potential to occur within King County, Washington. Critical habitat has been designated

for Puget Sound ESU Chinook salmon and Coastal/Puget Sound DPS bull trout within the mainstem of the Green River, which is located within the general project vicinity.

The potential presence of listed species within the project area was further evaluated by reviewing Washington Department of Fish and Wildlife (WDFW) Priority Habitats and Species (PHS) data, WDFW Wildlife Heritage data set, WDFW Stock Inventory Data, and the Washington Department of Natural Resources (WDNR) Natural Heritage Program rare plant species database.

There is one wetland that would be filled by this project, and it is of low quality and is not directly connected to any fish bearing streams. Best management practices will be in place for construction, permanent stormwater facilities will provide treatment of new pollution-generating impervious surfaces, no in-water work is proposed, and the nearest fish bearing stream is approximately ¼ mile from the project area. Therefore, **FTA has determined that the proposed action would have no effect on Puget Sound ESU Chinook salmon, Coastal/Puget Sound DPS bull trout or Puget Sound DPS steelhead. FTA has also determined that the proposed project will not destroy or adversely modify designated critical habitat for Puget Sound ESU Chinook salmon or Coastal/Puget Sound DPS bull trout.**

The project site does not include suitable habitat for the other listed species, therefore **FTA has determined that the proposed action would have no effect on those species.**

Magnuson-Stevens Act Finding

Under the Magnuson-Stevens Fishery Conservation and Management Act (MSA), federal agencies are required to consult with NMFS regarding any of their actions or proposed actions authorized, funded, or undertaken that may "adversely affect" Essential Fish Habitat (EFH) as designated by MSA (16 U.S.C. §1855 (b)(2)). The Pacific Fisheries Management Council has designated EFH for the Pacific Salmon Fishery, Pacific Coast Groundfish Fishery, and the Coastal Pelagic Fishery. To comply with the MSA, a no-effect letter was prepared by Sound Transit dated November 6, 2008 and submitted to FTA. FTA concurred with the determination of no-effect in a letter to Sound Transit dated November 24, 2008. Based on the information provided in the letter, **FTA has determined that the proposed actions of the project will have no adverse effect on EFH for Pacific salmon, Pacific coast groundfish, or Coastal Pelagics.**

Conformity with Air Quality Plans

Under the 1990 federal Clean Air Act Amendments (CAAA), no federal agency or department may support, license, permit, or approve any activity that does not conform to the state implementation plan (42 U.S.C. §7506(c)). Federal agencies are required to make a conformity determination under the transportation conformity regulations promulgated by EPA (40 CFR §§93.100 to 93.128). Conformity determinations are based on quantitative and qualitative assessments of a project's estimated motor vehicle emissions and possible violations of the NAAQS standards. For FTA, the federal funding agency for this project, to make a conformity determination, it must be

demonstrated that the project will not cause or contribute to any new violations of the NAAQS, increase the frequency or severity of any existing violations or delay the timely attainment of the NAAQS.

Federally-funded transportation projects in non-attainment and maintenance areas must be consistent with air quality goals and strategies, as described in the State Implementation Plan (SIP). The Proposed Action would be located within the Puget Sound carbon monoxide (CO) and ozone maintenance area. A transportation conformity determination for an individual project in this area consists of two components: the regional emissions analysis of CO and ozone and the project-level analysis of CO. The regional emissions analysis compares the emissions for all transportation projects in a region and is performed by the regional Metropolitan Planning Organization, in this case, the Puget Sound Regional Council (PSRC). A transportation project meets the first part of the conformity requirements if it is identified specifically in the current PSRC transportation plan and transportation improvement program (TIP), which have been analyzed for regional air quality impacts and been found by USDOT to conform.

The Tukwila Commuter Rail Station Project is included in both *Destination 2030*, the current metropolitan transportation plan for the Central Puget Sound region, and in the *2007-2010 Transportation Improvement Program*. The PSRC has modeled the total regional emissions for the plan and TIP, and determined that both the plan and TIP conform to the current SIP. USDOT has concurred in this determination. Because the Proposed Action is included in the current conforming transportation plan and TIP, it satisfies regional air quality conformity requirements.

A project-level analysis evaluates local CO concentrations at signalized intersections near the Proposed Action. Local CO concentrations related to the Tukwila Commuter Rail Station project were predicted using approved regulatory models and protocol. In the project's Opening Year (2012), the maximum calculated 1-hour CO concentration is 8.1 parts per million (ppm), which is far less than the 35 ppm NAAQS. The maximum calculated 8-hour CO concentration is 5.7 ppm, which is less than the 9 ppm NAAQS. By the Horizon Year (2030), maximum calculated 1-hour and 8-hour CO concentrations are 9.2 and 6.4 ppm, respectively, assuming non-optimized traffic delays. Again, these concentrations are far less than the 1-hour NAAQS of 35 ppm and the 8-hour NAAQS of 8 ppm. The proposed action would not increase the frequency or severity of any existing violations of the CO standard, nor would it create a new violation of the NAAQS for CO. Therefore, it meets project-level air quality conformity requirements.

At both the regional and project level, the proposed Tukwila Commuter Rail Station Project is found to conform to the purpose of the current SIP, and to all requirements of the Clean Air Act Amendments of 1990 and the State Clean Air Washington Act of 1991.

Farmland Findings

The project site may have suitable soils for farming but does not contain active farming. Although soils may be suitable, the site location between rail lines in an urban center

makes farming unlikely to be economical. **FTA finds that there would be no adverse impacts to agricultural lands caused by the project.** The project would be consistent with the Farmlands Protection Policy Act (FPPA) of 1981 (7 U.S.C. §§4201 - 4209) and other applicable state and federal farmlands protection policies, orders, and guidance.

Environmental Justice Findings

Executive Order 12898 provides that “each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.” The Department of Transportation’s (DOT) Order to Address Environmental Justice in Minority Populations and Low-Income Populations similarly requires agencies to explicitly consider human health and environmental effects related to transit projects that may have a disproportionately high and adverse effect on minority and low-income populations. It also requires them to implement procedures to provide “meaningful opportunities for public involvement” by members of these populations during project planning and development (DOT Order No. 5680.1). The DOT Order specifically provides for the consideration of mitigation and enhancement measures, as well as project benefits in making determinations regarding disproportionately high and adverse effects on minority and low-income populations.

The Environmental Assessment includes an environmental justice analysis in accordance with the Executive and the DOT’s Orders. The analysis determined that there are no concentrations of minority or low-income households located close enough to the project site to experience potential adverse environmental effects of either construction or operation of the proposed development. Project impacts are limited in scope and would be mitigated through the implementation of effective mitigation measures. Based on the analysis of environmental justice included in the Environmental Assessment, **FTA finds that the construction and operation of the Tukwila Commuter Rail Station Project would not result in disproportionately high and adverse effects on minority or low-income populations.** The broader community of Tukwila, which for King County has a higher than average representation of several ethnic and racial minorities as well as a lower than average median income level, should benefit from the permanent station and the access to commuter rail service, as it provides additional mobility and thus access to a wider range of employment and housing opportunities. These benefits further support the conclusion that no disproportionately high and adverse effects on minority or low-income populations would result from the project.

Floodplain Findings

Pursuant to Executive Order 1198 (Floodplain Management), Sound Transit assessed floodplains within the 100-year floodplains and floodways defined by the Federal Emergency Management Agency (FEMA). The Environmental Assessment found that the project is outside of the 100-year floodplain as defined in the City of Tukwila’s critical areas regulations, which are based on FEMA Flood Insurance Rate Maps (FIRM) currently in effect. However, based on draft Flood Insurance Rate Maps, the project area

is located within the 100-year floodplain of Springbrook Creek. If the draft FIRMs are correct, emergency vehicle traffic and excavation routes could be impacted by flooding, and the proposed pedestrian tunnel would be unsafe during a flood event. If the draft FIRMs are adopted as part of the regulatory compliance required for the project, compensatory floodplain storage would be required to mitigate for floodplain fill on the west portion of the site. Because the project area is in a developing urban setting and will be required to comply with local regulations regarding floodplains that protect against the loss of flood storage capacity, the additional impact of constructing the Tukwila Commuter Rail Station is not expected to have a significant impact on natural and beneficial floodplain values. **FTA finds that compliance with local regulations will ensure that no significant adverse impacts to 100-year floodplains or floodways would occur as a result of the proposed project.**

Wetlands Findings

The United States Department of Transportation seeks to assure the protection, preservation, and enhancement of the nation's wetlands to the fullest extent practicable during the planning, construction, and operation of transportation facilities and projects (DOT Order 5660.1A). This is consistent with Executive Order 11990, requiring that new construction located in wetlands be avoided unless there is no practicable alternative to the construction and that the proposed action include all practicable measures to minimize harm to wetlands that may result from such construction.

The U.S. Army Corps of Engineers (Corps) regulates discharges of dredged or fill materials into waters of the United States, including wetlands, under Section 404 of the Clean Water Act. In addition, the State Department of Ecology regulates activity that might result in a discharge of dredge or fill material into water or jurisdictional wetlands, under Section 401 of the Clean Water Act. The purpose of the Clean Water Act is to "restore and maintain the chemical, physical, and biological integrity of the Nation's waters." The Corps requires that wetland impacts be avoided or minimized to the extent practicable, and mitigation would likely be required for unavoidable wetland impacts.

One wetland (Wetland S) with a Category III rating will be affected by the Tukwila Commuter Rail Station Project. The wetland will be completely filled in order to expand the berm supporting the BNSF tracks and station platform. Mitigation for impacting the wetland will be provided as described in Section 4.4.4.1 of the Environmental Assessment. **FTA finds that, with the mitigation to which Sound Transit has committed, no significant adverse impacts to wetlands would occur as a result of the proposed project.**

Environmental Finding

Based on the Environmental Assessment and its associated supporting documents, the Federal Transit Administration finds pursuant to 23 CFR §771.121 that there are no significant adverse impacts on the environment associated with the development and operation of the proposed Sound Transit Tukwila Commuter Rail Station Project.

APPENDIX A

Written Comments and Responses

Tukwila Commuter Rail Station Project

March 2009

Index to Comment Letters

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The response to comments begins on page A-13.

Comment Letter No. 1

From: Karen Walter [mailto:KWalter@muckleshoot.nsn.us]
Sent: Friday, February 13, 2009 6:08 PM
To: Cornish, Paul
Cc: Kennedy, Steven; John Witmer
Subject: Tukwila Commuter Rail Station, NEPA Environmental Assessment

Mr. Cornish,

The Muckleshoot Indian Tribe Fisheries Division has reviewed the Environmental Assessment for the above referenced project. We have some comments for your review and consideration.

1. We would like to be notified by Sound Transit early and given a chance to comment on the proposed mitigation for the filling of Wetland S. This would include any proposal to purchase mitigation credits from the Springbrook Creek Wetland Mitigation Bank. 1

2. According to the consultant to the City of Renton for the Strander Boulevard project, this project has been modified via the Corps 404 and Ecology 401c permitting process and is likely no longer be having the same impacts as discussed in the Tukwila Commuter Station EA. If this is correct, then Sound Transit should get a copy of the approved 404 permit and provide updated information in an EA addendum. 2

3. We would also like to be notified if the project is required to complete compensatory floodplain storage. 3

4. The proposed use of low impact development measures is a good mitigation measure and should be implemented. 4

5. While the project is having no direct impacts to Springbrook Creek, its tributaries or the Green River, it is important to note that the salmon information discussed in the November 6, 2008 No Effects Letter regarding impacts to ESA listed species is incorrect. The letter indicates that chinook salmon are not known to occur in Springbrook Creek based on WDFW PHS and Salmonscape data). However, chinook salmon do occur in Springbrook Creek as documented in the Water Resource Inventory Area (WRIA) 9 Fish Distribution Map for this area. 5
<http://your.kingcounty.gov/dnrp/library/2000/kcr728/vol2/partV/FISHDIST/Chinook/CHINO OKdistroLOWER.pdf>. Sound Transit Biologists need to consult more than just the WDFW PHS database and Salmonscape information as these databases may not reflect local knowledge regarding salmonid species and their distribution that was gathered during the Watershed Limiting Factors Analyses as part of the Puget Sound salmon recovery plans. There are fish distribution maps available for both WRIAs 8 and 9 that are readily accessible on King County's website.

We appreciate the opportunity to comment on this proposal and look forward to continuing to work with Sound Transit as this project progresses through permitting. If you have any questions regarding these comments, please email me or call me at 253-876-3116.

Thank you very much,

Karen Walter
Watersheds and Land Use Team Leader
Muckleshoot Indian Tribe Fisheries Division
39015 172nd Ave SE

Auburn, WA 98092

Comment Letter No. 2



February 13, 2009

Paul Cornish
Project Manager
Sound Transit
401 S. Jackson Street
Seattle, WA. 98 104-2826

Dear Paul,

Staff from the Cities of Tukwila and Renton has reviewed the NEPA Environmental Assessment (EA) for the permanent Tukwila Commuter Rail Station. Our comments fall into two categories: 1) specific comments on EA issue areas, including land use, wetlands, and noise impacts and mitigation; and 2) A reminder of the outstanding issues that still need to be resolved by Sound Transit and the Cities, that when resolved] may necessitate additional environmental review. Our comments are as follows:

Specific Comments - City of Tukwila

1. Parking

- The Parking Determination by the City may require the EA to be amended. 1
- Table 4-4. Existing Parking Space Inventory & Utilization. The parking counts and utilization rates are outdated. More recent counts taken in June 2008 show that VanShare spaces are at almost a 100% utilization rate, and at certain times, the parking lot utilization rate is over 100%. 2
- Section 4.2.3.6 states that "Demand for parking at the Tukwila Station could exceed future parking lot capacity by 2030." A parking garage to accommodate an increase in parking capacity needs to be mentioned as one of the mitigation alternatives addressing parking overflow. 3

2. Transportation/Traffic Impacts

- Page 4-12. Commuter rail station traffic. This is accurate data from the study of 11 typical car/transit park and ride lots. However, this is a multi-modal commuter rail/intercity passenger rail/transit/car/bicycle/pedestrian/park and ride lot that 4

warrant a specific parking study to represent its unique character. The car/transit park and ride lot analysis is not adequate.

- Page 4-22. Section 4.2.2.1 Short Term Construction Impacts. Due to the deteriorated condition of Longacres Way, Tukwila will study the pavement mitigation necessary by requiring Sound Transit to perform structural evaluation of the roadway pavement before and after hauling the 44,000 cubic yards of excavation and fill soils, in order to measure the roadway pavement strength degradation. As a result, Tukwila will assess a pavement condition loss fee due to these construction truck roadway pavement impacts. If this is not adequately addressed by Sound Transit in the EA response, Tukwila will discuss with the development agreement process. 5
- Page 4-24. With-Project Conditions. The City of Tukwila standards require Sound Transit to construct continuous reconstructed pavement/curb/gutter/sidewalk/illumination all the way out to West Valley Highway, including filling in gaps where no sidewalks and street lighting/illumination exists due to the increased volume of pedestrians, bicycles, trucks and passenger vehicles. This is especially true due to large number of construction truck trips for excavation and fill, as well as potential for Strander access to not be available for years. While there are segments of existing curbs and sidewalks with street lights, the gaps must be completed. If the developer to the north of Longacres Way (Tukwila Townhomes) constructs their project after Sound Transit, Sound Transit shall lower the profile of Longacres Way in the common private road so as to allow Boeing access before, during and after construction of improvements on both sides. 6

3. Non-Motorized Facilities

- Page 4-39. Section 4.2.2.6. Nelson Place. The Interurban trail is a recreation trail that runs from Algona up to Fort Dent Park. This bicycle/running/walking trail does not replace the needs for sidewalks on Nelson Place. The City of Tukwila , will require public frontage improvements as part of mitigation. Required improvements include curb, gutter, sidewalk, roadway reconstruction, storm drainage, illumination and landscaping. 7
- The City of Tukwila's draft plan for the Southcenter area includes a nonmotorized trail connecting the heart of the urban center to the Commuter Rail Station via an extension of Baker Boulevard. Sound Transit should be a partner in this project with the City, since it is Sound Transit policy to provide pedestrian access within a quarter mile of the station. Also, the EA should address pedestrian circulation to and within the site, particularly from the existing Strander Blvd and areas south. This will be even more important if the UP railroad lines do not get relocated as part of Renton's Strander Blvd overpass project. 8

The EA does not address non-motorized access from the east side of the project, from Renton. Also, the EA does not mention Tukwila's requirement for Sound Transit to construct bicycle lanes on Longacres Way.

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- Page 4-56 & 57. Section 4.2.4 Mitigation Measures for Transportation Impacts. As previously stated, The 1998 EA for the Tacoma-to-Seattle Commuter rail stated, on page 3.3-13 "Mitigation measures would, however, be needed to improve the proposed park-and-ride lot access. Longacres Way is currently in poor condition and would need to be reconstructed and channelized to support project-related traffic. This access improvement would be pursued by Sound Transit in conjunction with other benefited property owners." Sound Transit should stand behind all previous commitments.

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4. Safety & Security

- Page 4-120. 4.12.1 Affected Environment. This section does not adequately characterize the remoteness of the proposed station and the car theft and break-ins currently occurring at the site.
- Page 4-121. Section 4.12.3 inadequately describes impacts on personal safety at the station. The EA states that the waiting areas will be visually accessible from adjacent streets and populated areas, and that the design will allow surveillance by patrol cars. However, the station and parking area are of considerable distance south of Longacres Way, and there is no visual access from adjacent streets and cars of the following areas: in the tunnels, between the railroad tracks, and on the east side of the BNSF track.
- There are no mitigation measures proposed to mitigate vehicular break-ins during the day, when the trains are not arriving or departing from the station. Also, there is no discussion of mitigation proposed to ensure the safety and security of Amtrak passengers arriving or departing. Included in the proposal is an Amtrak shelter. No mention is made of safety issues regarding this facility. Tukwila is concerned about who will be responsible for security of this facility and for the passengers that use it.
- One of the Tukwila's significant concerns is safety and the perception of safety in the tunnel beneath the BNSF railroad tracks. The EA does not address this issue. Tukwila would like to see more discussion of specific mitigation in the form of tunnel design, lighting, sounds, alarms, etc.

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5. Agreements with Cities

Page 1-13, Section 1.3.4. Omitted from this section is the agreement that Sound Transit entered into with the City of Tukwila and Renton - **The Joint HOV and Transit Action Plan between the Cities of Renton & Tukwila and Sound Transit**, dated April 26, 2005. Contained in this agreement are issues related to Sound Transit commitments to provide secondary access to the Station and improvements to

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Longacres Way. Another agreement is a September 5, 2002, Settlement Agreement between Sound Transit and the City of Renton.

6. Comfort Station

- Page 3-5. Table 3-2. See previous comment under "outstanding issues" related to public restrooms.

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7. Land Use

- Section 4.1.2 Impacts. Tukwila is in the process of reviewing, adopting, and implementing their plan for the Tukwila urban center. The plan calls for an intensification of the area surrounding the Tukwila Station with more urban forms of mixed use. While a commuter rail station does contribute to the planned uses in the area, the current station configuration does not fit in with the envisioned neighborhood's more urban and pedestrian oriented character. The EA does not acknowledge this significant change in future land use, and analyze the impacts of the project with this in mind, particularly related to the station's approach towards stormwater detention pond and surface parking. These are uses that are inconsistent with the community's mid to long term vision for the area.
- Section 4.3.1, 'Affected Environment. The EA inadequately characterizes the current development potential of the area immediately adjacent to the station. Current zoning permits residential uses at 65 units per acre within 1/4 mile of the station site. When the City of Tukwila's urban center plan is adopted (Fall 2009) warehouse and industrial uses will not be permitted in this area. Instead, only transit supportive mix of office, retail, and residential uses will be permitted.

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8. Biological Resources

- Section 4.4.2.1, Page 4-62, paragraph just beneath Table 4-9. It is stated that the hydrology of Wetland S is driven by precipitation. The EA should reflect that it is also likely driven by groundwater due to the shallow groundwater levels in certain areas of the site (per Section 4.10.1 where it states that "high groundwater and surface water occurring in places, as evidenced by the several wetland patches onsite....").
- Section 4.4.1, page 4-76, second paragraph from top. Off-site mitigation for buffer impacts to Wetland N would not be an acceptable mitigation approach.

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9. Water Quality & Hydrology

- No analysis is made of alternative stormwater detention facilities, including underground vaults. The EA lacks an analysis of using a significant portion of the site for a stormwater detention pond and the impact on the site's redevelopment potential.
- Section 4.5.3.3, page 4-86, last paragraph. The last sentence seems to be missing some words, and makes no sense.

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10. Hazardous Materials

- Section 4.14.2, page 4-125 third paragraph from top. Another potential source of contamination along the railroad right of ways is historic herbicide use. This should be mentioned in &EA. 23

11. Noise

- Section 4.6.3.1, page 4-89 end of second sentence, first paragraph revise to say "...is exempt from the noise limits of 8.22.040 but subject to the noise limits of 8.22.060-090 (TMC 8.22.100)." 24
- Section 4.6.3.1, page 4-89 end of third sentence, first paragraph revise to say "...is exempt from the limits of 8.22.040 but subject to the noise limits of 8.22.060-090 except when received with a Residential..." 25
- Section 4.6.3.1, page 4-89 final sentence, first paragraph is incorrect. Noise generated on private property is subject to 8.22.040 without distinction for private road versus private property. 26
- Section 4.6.6, first sentence, first paragraph incorrectly states that temporary construction noise is exempt. Construction noise received in commercial and Industrial Districts, although specifically exempt from being classified as a public disturbance noise, is not exempt from the noise limits applied to Commercial and Industrial Districts. For these districts, a noise variance would be required if construction sound levels are shown to exceed the allowable limits described in TMC 8.22.040. 27
- Section 4.6.6 discusses possible mitigation measures while recognizing that construction noise could negatively affect people at nearby businesses and facilities. Various mitigation techniques are explained but are not specifically being offered. 28

Other Outstanding Issues - City of Tukwila

1. Parking Determination.

We have not yet seen the parking demand study promised by Sound Transit during the 2008 Unclassified Use Permit process, justifying the amount of parking needed at final build out. We recommend that Sound Transit prepare a parking analysis now, prior to issuing a FONSI, to ensure that the EA sufficiently analyzes parking demand and that the final station design accommodates the necessary amount of parking. If the parking determination indicates a need for additional parking, this could have implications for stormwater detention requirements and the station site design. Additional analysis and mitigation may be required in the EA. A parking determination study, similar to the one prepared for the light rail station at 154th, must be approved prior to the Tukwila City Council issuing the Unclassified Use Permit for the permanent station. 29

2. Public Restrooms.

Tukwila Station is an area of public assembly serving commuter rail, Amtrak, and Metro bus riders. Given the remoteness of the site and the lack of public facilities close by, public restrooms should be included in the proposal and construction funded by Sound Transit. The Tukwila City Council will look to those provided at the 154th Street LINK station as a precedent. The City Council will address this issue as part of the Unclassified Use Permit if it is not addressed as part of the EA.

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3. Traffic Improvements.

As noted in our comments on the EA, off-site Traffic Improvements Longacres Way and Nelson Place must be brought up to current City of Tukwila Public Works standards due to the increased volume of pedestrians, bicycles, trucks and passenger vehicles. This is especially true due to large number of construction truck trips for excavation and fill, as well as potential for Strander access to not be available for years. While there are segments of existing curbs and sidewalks with street lights, the gaps must be completed. If not adequately addressed in the EA and through final design, these issues will be discussed with the Development Agreement process.

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4. Unclassified Use Permit.

As a reminder, the Tukwila City Council will be guided by the criteria in TMC Chapter 18.66.060 in their review of Sound Transit's request for a UUP for the permanent station. These criteria include undergrounding of facilities, compatibility with surrounding land uses and the comprehensive plan, and mitigation of all impacts. If not adequately addressed in the EA and through final engineering, these issues will be revisited by the Tukwila City Council as part of the UUP process.

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Specific EA Comments - City of Renton

Section 1.2.2, pg. 1-9, *Relationship to the Strander Boulevard Extension and Union Pacific Railroad Realignment Project*. The text in this section states that the "Tukwila Commuter Rail Station project is functionally independent of the UPRR relocation project and will proceed regardless of that project." In the EA document Sound Transit acknowledges that the Strander project would provide important east-west access, but implies that even without such a road, transportation needs are met. We want to remind Sound Transit that adequate east-west access was identified as being required in the original programmatic environmental work for the commuter rail plan as a whole. Furthermore, the 2002 Settlement Agreement with Renton also identified access from the east, from Renton. With recent new conditions being placed on the Strander project by UPRR, this important project is facing some very difficult obstacles and is in some jeopardy. We believe that access from the east (Renton) as well as adequate public road access from the west (Tukwila) needs to be adequately addressed, including contingencies for a possible change in the Strander project, or alternative east access options. The options that may need to be re-evaluated are an undercrossing of the two railroad tracks, or an at-grade access by providing new Renton streets which connect to Longacres Way (from the east as well as from the west), or other options. Sound Transit needs to participate in the process and, if necessary, make adjustments in either the Station design and/or schedule to accommodate access from Renton. We believe that

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constructing what appears to be the only commuter rail station in the region whose sole access is from a private road (virtually a long driveway) is not adequate.

Conclusion

We would like to acknowledge that Sound Transit has faced many on-going challenges during the Tukwila station area planning process, such as the uncertainty regarding the Strander Boulevard extension and the relocation of the Union Pacific right of way. We appreciate Sound Transit's continuing efforts in trying to overcome these challenges, and look forward to moving ahead together with the planning process.

Please don't hesitate to contact us, Lynn Miranda at 206.431.3670, or Peter Hahn at 425430 7242, if you have any questions on these issues.

Sincerely,



Jack Pace
Director
Dept. of Community Development
City of Tukwila



Gregg Zimmerman
Administrator
Public Works Dept.
City of Renton

CC: Peter Hahn, City of Renton
Bob Giberson, City of Tukwila
Nora Gierloff, City of Tukwila
Lynn Miranda, City of Tukwila

Comment Letter No. 3

From: Wingate, Angela [mailto:Angela.Wingate@pse.com]
Sent: Saturday, February 14, 2009 8:41 AM
To: Cornish, Paul
Cc: Hempstead, Susan B; Kelly, Julie A; Namura, David
Subject: Sound Transit Tukwila Commuter Rail Station NEPA Environmental Assessment (EA) - PSE's Comment Letter

February 14, 2009

Sent Via E-Mail to paul.cornish@soundtransit.org

Sound Transit
Attention: Paul Cornish, Project Manager
Sound Transit, Union Station
401 S Jackson St Seattle, WA 98104-2826

Dear Mr. Cornish,

Puget Sound Energy (PSE) appreciates the opportunity to provide the following comments to the Sound Transit Tukwila Commuter Rail Station NEPA Environmental Assessment (EA). PSE is Washington State's oldest and largest energy utility with a 6,000-square-mile service area stretching across 11 counties. PSE serves more than 1 million electric customers and 735,000 natural gas customers, primarily in western Washington.

PSE strives to maintain a positive, professional and productive relationship with all the customers we serve and the relationship we have with Sound Transit is extremely important to PSE. We view our partnership as critical to our ability in providing safe, reliable, efficient and cost-effective electric and natural gas services to our customers in and around the Puget Sound region.

As part of PSE's service obligation, we are required to maintain and reinforce our electric and natural gas systems as the need arises. New growth places increased demand for electric and natural gas services and the associated utility infrastructure. All of this requires PSE to be particularly responsive to all service needs. PSE must have the ability to access and maintain safe, immediate and reliable service to our customers.

We have reviewed your Tukwila Commuter Rail Station NEPA EA and respectfully request the following revisions to be taken into consideration:

- There are a number of areas where the EA document speaks to the placement of various station elements (including but not limited to: Station platforms, canopies, mini-high platforms, pedestrian amenities, broad plaza elements, future third track expansion, art, bike storage, comfort stations, ticket vending machines, landscaping, lighting, rail platforms and signage). It is important to recognize these elements must be sited in such a manner to maintain required safe distances from PSE's overhead and underground facilities. 1

- Figure 1-2 Aerial Photo of Project Site: This photo is missing PSE's east-west transmission line near the center of Sound Transit's property. Also, the noted "PSE Substation" should be listed as "PSE Cable Station". 2

- Chapter 3.2.1 Station Location: If the proposed platforms are located farther north this would help in avoiding a conflict with PSE's transmission line. 3
- Chapter 3.2.2 Parking Facilities: Construct the parking areas at such a grade that will allow for maintenance vehicle access into PSE's Nelson Cable Station and transmission lines. 4
- Chapter 4.11.2.1 Construction: The noted "PSE substation" should be listed as "PSE Cable Station". Protect PSE's Nelson Cable Station and transmission lines from disruptions in service and relocation. 5

APPENDIX A Alternatives Considered

- Do not install Layover or Ponds near PSE's Nelson Cable Station or transmission lines due to the need for PSE to maintain these facilities. 6
- Do not install TBD stalls on PSE Right-of-Way (ROW), due to the need for PSE to maintain overhead and underground facilities. 7
- Do not suggest the relocation of PSE's Nelson Cable Station, or any transmission lines due to PSE needing to be particularly responsive to all service needs. Due to the highly complex nature of these facilities, it is inappropriate to consider the relocation of a facility of this nature. In addition, PSE must have the ability to maintain safe, immediate and reliable access to these facilities in order to continue to provide uninterrupted service to our customers. 8

These requests are based upon PSE's safety concerns so as to avoid hazardous situations where the transmission lines could either fall or arch onto Station elements.

As you continue to develop the Tukwila Commuter Rail Station, we request you to carefully consider the complexities associated with PSE's need for access to our facilities and private property. Sound Transit should place a high priority on assisting PSE to provide continuity and uninterrupted service to our customers in western Washington, including your own agency, since PSE is providing electrical service for portions of your Link Light Rail system.

Thank you for the opportunity to comment. We look forward to working with your project team as you develop the Tukwila Commuter Rail Station. If you have any questions concerning these comments, please contact me at 425.462.3351 or angela.wingate@pse.com.

Thank you,
Angela Wingate
Municipal Liaison Manager

PUGET SOUND ENERGY
425.462.3351 tel
425.213.2315 cell
355 110th Ave NE EST-11W
Bellevue, WA 98004
www.PSE.com

Comment Letter No. 4



City of Tukwila

Department of Community Development

Jim Haggerton, Mayor

Jack Pace, Director

March 18, 2009

Paul Cornish, Project Manager
Sound Transit
401 S. Jackson Street
Seattle, WA 981094

Dear Paul,

I would like to clarify the City of Tukwila's comments in our February 13, 2009 review of the Tukwila Station NEPA Environmental Assessment.

Parking Determination

In our February 13, 2009 letter (page 5 comment 1 – Other Outstanding Issues) we recommended Sound Transit prepare a parking analysis now, prior to issuing the FONSI. Based on additional discussions with you, Sound Transit CEO Joni Earl, other Sound Transit staff and internal discussion, the City no longer recommends that an additional parking analysis be prepared prior to issuing the FONSI. The City is committed to working in partnership with Sound Transit as the current NEPA environmental process is completed and Final Design is initiated this summer.

Our two agencies will start to work together this spring on the parking determination and unclassified use permit approvals required by the City of Tukwila, and hold a pre-application meeting prior to the initiation of final design.

Sincerely,

A handwritten signature in black ink, appearing to read "Jack Pace".

Jack Pace

Community Development Director
City of Tukwila

RESPONSES TO WRITTEN COMMENTS

COMMENT LETTER #1 – Karen Walter, Muckleshoot Indian Tribe Fisheries Division

1. Thank you for your comments. Sound Transit will continue to provide notification to the Muckleshoot Tribe on the project as the design and mitigation program is developed and permits are obtained.
2. Sound Transit made use of the most recent documents provided by the City of Renton for this EA. Pursuant to an agreement between Sound Transit and the City of Renton in 2008, all wetlands on the Tukwila Commuter Rail Station site except Wetland S would be filled as part of the UPRR track relocation (if that project goes forward) and Renton will provide mitigation for the loss of those wetlands. Sound Transit has not been notified of any change in that commitment.
3. Sound Transit will continue to provide notification to the Muckleshoot Tribe on the project as the design and mitigation program is developed and permits are obtained.
4. Sound Transit has committed to implementation of LID measures as described.
5. Comment noted. To clarify, the WRIA map referred to in the comment letter shows that the tributary on the project site is not known to support Chinook salmon, while the mainstem of Springbrook Creek (labeled Black River on the WRIA map) shows “known” use as of 2000 when the map was published.

The findings and conclusions in the no effect letter are narrowly construed and are based on the conclusion that the action will result in no change to the environmental baseline as defined by NMFS and USFWS guidelines and the ability of the action to meet prescribed stormwater standards and regulatory thresholds. Specifically, there will be no in-water work in a waterbody connected to the stream and, this project will be designed to meet the requirements of the 2005 *King County Surface Water Manual*.

The "no effect" determinations were not based on the absence or preclusion of Chinook in the larger watershed. The information on distribution of Chinook salmon is provided as background to provide context and to indicate that the potentially affected drainages are not known to be of primary use by significant numbers of the larger affected ESU. The fact that the various databases disagree is evident of this fact. The no effect letter was included as documentation as it pertains to meeting ESA regulatory requirements. It is not intended to provide an extensive or even complete assessment of fish or fish use in the Springbrook Creek drainage or larger watershed.

COMMENT LETTER #2 – Jack Pace, Director, Tukwila Department of Community Development, and Gregg Zimmerman, Administrator, Renton Department of Public Works

1. Thank you for your comments. We note that Sound Transit met with representatives of the cities subsequent to this letter and that Tukwila subsequently provided a clarifying letter to Sound Transit regarding the parking analysis. That letter states that Tukwila is no longer recommending that additional parking analysis be done by Sound Transit prior to issuance of a FONSI, as stated in their 2/13/09 comment letter. This clarifying letter is included with the FONSI as Comment Letter # 4. Also see the response to Comment 29 below.
2. As the Cities are aware, parking enforcement at the site is limited, and many non-transit users, including City of Tukwila vehicles, are parked at the site both during and after times when transit service is provided. As such, observed parking utilization rates are not necessarily reflective of demand generated by the station. It is acknowledged that without stricter enforcement, this problem could be greater as the area develops further, especially because Tukwila has proposed, in its 2009 draft Tukwila Urban Center Plan, elimination of minimum parking requirements for all other development within 600 feet of the Tukwila Commuter Rail Station.

We are pleased with the amount of VanShare space being utilized as this mode of use for the station is supportive of our overall mission. Sound Transit will increase space available for VanShare if demand increases.

3. The voter-approved budget for the project does not support provision of a parking garage. Constructing additional parking would also encourage more use of single occupant vehicles to arrive at the site, and would appear to be contrary to the proposed City of Tukwila policy of eliminating minimum parking requirements for other uses in the station area.
4. A specific study of the current site trip generation was performed, and was compared with the rate developed from 11 other studies and published in the 2003 *ITE Trip Generation*. The reason for citing the park-and-ride studies was to corroborate the results of those studies with the observed ratio of trips to parking spaces. The strong correlation found in the other studies generally confirmed the correlation observed in the Tukwila Station site-specific study. As noted, the ratio of trips per parking space at the Tukwila Station was slightly higher than the ratio observed by the ITE. Sound Transit chose to use the rate ratio found in the site-specific study for the analysis in the EA because it is the more conservative number, i.e. it results in a higher estimate of impacts than the ITE rate would suggest.
5. Sound Transit acknowledges that construction traffic could damage the roadways used for hauling material to or from the site, although significant impacts are not anticipated. As is typical with all construction projects, if a construction vehicle

damages a roadway, the builder may be required to restore the roadway. Sound Transit will work with the City of Tukwila to document road conditions prior to construction and mitigate damage to public roads caused by construction traffic.

6. As noted in the City's comments on the draft EA "There is a continuous sidewalk on the south side of Longacres Way from W Valley Highway to the Sounder station." The comment did not provide a code citation for the requirement of off-site improvements such as sidewalks, lighting, and drainage on public streets. Sound Transit was not able to confirm this requirement, other than immediate public frontage, in the Tukwila Municipal Code. Sound Transit will meet all City requirements for roadway improvements for public and private roads.
7. See comment 6 above. The proposed station would likely generate a small portion of the non-motorized traffic on Nelson Place. Sound Transit does not view a minor addition of pedestrian traffic to Nelson Place as an impact that requires mitigation.
8. Pedestrian access to and within the site is discussed in the EA. The project has been designed to accommodate connections to the Baker Boulevard trail by creating a central plaza on that axis, but Sound Transit is not proposing building any connections.
9. Sound Transit is not proposing any new, dedicated, non-motorized access from east of the station but has made a financial commitment to developing an east west road, which can also accommodate non-motorized access.
10. Sound Transit is aware of and will complete its commitments regarding transportation mitigation for this project.
11. In the short term, the proposed station will remain somewhat isolated from surrounding development, although no more isolated than the temporary station on the east side of the tracks. Car thefts and break-ins are common in any large parking area, even at regional shopping malls. Sound Transit recognizes that because the existing lot is used extensively during non-transit service hours, the existing lot is vulnerable to these types of crimes. However, with the mitigation measures described in the EA, such as CCTV and security patrols, this is not expected to be a significant impact with the development of a larger station and parking area. In addition, with expected additional development in the vicinity that has been described in Tukwila's Urban Center Plan and in plans for the Boeing property to the east, the visibility of the site should improve over time.
12. See comment response #11 above. Although the project design is not complete, the design will be evaluated for such areas of low visibility and other security concerns. Where appropriate, the mitigation measures described in the EA will be provided to mitigate security concerns.

13. The mitigation measures described would provide greater surveillance than at the current site. If and when Amtrak proposes to build a shelter for its passengers, Amtrak will consider security issues in the design of that facility, and provide appropriate mitigation, which could include measures listed in the EA or other appropriate measures.
14. The design will be evaluated for areas of low visibility and the mitigation measures described in the EA will be provided to mitigate security concerns. Sound Transit employees (Station Agents) are on site assisting passengers when Sounder is operating.
15. Sound Transit acknowledges that the agreements referred to in the comment letter still have effect. The specific list in Section 1.3.4 was regarding specific environmental issues associated with previous environmental review. The reason that the 2008 agreement with Renton was listed was because it identified Renton's intentions with regard to wetlands on the site, which was directly relevant to the environmental assessment and a determination on whether the Tukwila Commuter Rail Station project would have significant impacts.
16. Sound Transit has made a policy decision that it will not provide restrooms at its commuter rail stations.
17. The EA does note in Section 4.1.1.2 that Tukwila has been preparing a plan for an urban center and that density in the area is expected to increase. In the Draft Urban Center Plan that has just been published in early 2009, both landscaped detention ponds and surface parking are described in the proposed development guidelines for the area and are therefore considered compatible with other planned uses.
18. The section referred to (4.3.1) does acknowledge the potential for a change in the nature of development in the area. However, that section focused on social and economic factors pertaining to environmental justice as it relates to the construction of the rail station. Please refer to the land use section for information pertaining to future land use. It is acknowledged that the proposed prohibition of warehouse and industrial uses in the area would be supportive of a shift to the types of uses described in section 4.1.1.2.
19. The statement in the EA about Wetland S is based on the wetland report prepared for the City of Renton and on field observation. The hydrology of Wetland S does not appear to be driven by a high water table.
20. Comment acknowledged. Wetland N is considered non-jurisdictional by the US Army Corps of Engineers and may be exempt under the City of Tukwila regulations, since it is a ditch created by the railroad for drainage purposes. If the UPRR tracks are not relocated, Sound Transit will work with the City of Tukwila to determine the appropriate mitigation, if any, for the reduction in buffer around this wetland.

21. The first comment listed under Water Quality and Hydrology is related to land use effects of the project. Sound Transit has worked with and will continue to work with the City of Tukwila to identify opportunities to develop the portion of its property that is not needed for the station. The site has also been designed so that, if appropriate, the detention facility could be replaced with an underground system to accommodate additional development at some future date. The proposed stormwater design is based a report prepared for the project by INCA Engineers in June 2008. The design team evaluated five storm water alternatives. Two of the five proposed included underground storm water storage facilities. The results of this analysis had been presented to City Tukwila staff on May 6, 2008.
22. Thank you pointing out this typographical error. The statement at the end of the bottom of page 4-86 was intended to read: “Vegetation planned for the perimeter of the stormwater detention pond will provide shade, which can also reduce surface water temperature in the pond.” Thank you for pointing out the error.
23. While use of herbicides has been common in the past along railroad tracks, the evidence on this site suggests that there has not been wide use of herbicides here for some time. It is not anticipated that there would be any persistent herbicide residues that could be a danger to workers or the general public during construction or operation of the Tukwila Commuter Rail Station.
24. The provisions of TMC 8.22.060-090 apply to motor vehicles. The following is the definition of Motor Vehicles at TMC 8.22.020.11: “Motor vehicle” means any vehicle that is self-propelled, used primarily for transporting persons or property upon public highways, and required to be licensed under RCW 46.16.010. (Aircraft, watercraft and vehicles used exclusively on stationary rails or tracks are not “motor vehicles” as that term is used herein.)”.
25. See response to item #24 above.
26. The sentence in the EA is correct, but may have been misunderstood. Noise from trains is not regulated by the noise ordinance. It is acknowledged that noise from vehicles operated on private property or private roads that is received within a Residential zone is regulated the same as any other sound source on private property.
27. Thank you for the clarification regarding when a noise variance would be required. The project will comply with local noise regulations and a variance will be sought if necessary.
28. Construction noise will be dependent largely on the contractor’s means and methods of constructing the project. The examples of mitigation are offered as possible approaches, but the contract specifications will require that the contractor ensure compliance with local noise regulations.

29. Outstanding issues- Parking Determination. Sound Transit recognizes that, as an unclassified use, a parking determination is required and will work with the City of Tukwila as part of the City permitting process. As noted in the EA, the parking required for the station was determined based on Sound Transit's analysis of future ridership developed for Sound Transit 2 planning purposes. That analysis is based on many interrelated factors that are expected to change over a long time period. Sound Transit believes that this is the best estimate available of future demand at this station. Sound Transit also recognizes that the outcome of the permit process could affect the project and require a modification to the EA.

Pursuant to our meeting with City staff after receiving the comment letter, we understand that the City of Tukwila has changed its position and no longer recommends that ST do additional parking analysis now, prior to issuance of a FONSI. The City of Tukwila sent a clarification letter to this effect included as Comment Letter #4. .

30. Sound Transit has made a policy decision that it will not provide restrooms at its commuter rail stations.
31. Off-site traffic improvements are not currently proposed, thus none are evaluated in the EA. Sound Transit recognizes that mitigation may be required in proportion to adverse impacts that have a demonstrated nexus to the station project. For temporary construction traffic impacts, Sound Transit will develop a traffic management plan that will be provided to the City for review and approval.
32. Sound Transit recognizes that an Unclassified Use Permit is required and is aware of the criteria for approval. In Sound Transit's perspective, none of the features of the Tukwila station is incompatible with existing or expected future uses in the station area. Indeed, it is our understanding that the reason Tukwila has wanted the station to be located in the urban center is because it would help attract the type of development that Tukwila would like to see in that area. As the Cities know, however there is a limited budget for the station that was approved by the region's voters. Sound Transit will continue to work with the City to maximize benefits to transit users and the cities of Renton and Tukwila that is possible with the available funds.
33. Sound Transit has made a financial commitment to an east-west connection between the station and Renton. In a recent meeting, Sound Transit reiterated its commitment to provide those funds for whatever solution proves most feasible. Sound Transit will continue to work with both the City of Renton and the City of Tukwila on the best method to provide access to the site in both the short and the long term.

COMMENT LETTER #3 – Angela Wingate, Puget Sound Energy (PSE)

1. Thank you for your comments. The station will be designed in accordance with overhead and underground rights held by PSE. No significant conflicts with PSE facilities are anticipated.
2. The aerial photo was not intended to be an exhaustive inventory of features in and around the site, but rather to provide landmarks. It is acknowledged that PSE has a transmission line parallel and adjacent to the Cedar River Pipeline No. 4 shown in the center of the site.
3. The platform location has been determined based on critical track geometry and cannot be moved further north without affecting the trestle at Longacres Way. Sound Transit does not anticipate that any platform features would conflict with the overhead transmission lines.
4. The parking will be designed so that access can be provided to the PSE Cable Station.
5. Thank you for the clarification on the proper label for the cable station. Labeling on the figures for the EA has not been changed, but future design drawings will include the proper labeling to help ensure clear communication between Sound Transit, its contractors, and PSE. The contract plans and specifications will also include requirements to protect utilities.
6. As noted in the introduction to Appendix A of the EA, Alternative 6 was chosen as the preferred alternative and a hybrid design was developed incorporating the best features of other alternatives with the basic concept of Alternative 6. The current design developed from this alternative does not include ponds near PSE facilities. The layover facilities, which are primarily roadway where buses can be parked between runs, are not expected to conflict with nearby utility facilities.
7. No parking is proposed on the PSE right-of-way. The design includes up to 40 additional parking stalls that could be constructed in the future to the south of the PSE transmission line easement. These would be designed to avoid conflicts with PSE operations and maintenance.
8. No relocation of the PSE cable station is anticipated for this project in the current design.

**COMMENT LETTER #4 –Jack Pace, Director, Tukwila Department of
Community Development,**

Thank you for your comment. Sound Transit looks forward to working with the City on this and other permitting requirements for the station.

APPENDIX B

Tukwila Commuter Rail Station

Mitigation Commitments

March 2009

Tukwila Commuter Rail Station Mitigation Commitments March 2009

Following the issuance of the Finding of No Significant Impact (FONSI) by the Federal Transit Administration, Sound Transit proposes to initiate final design of the project elements. The Environmental Assessment (EA) discusses a variety of potential mitigation measures; those to be implemented are described below. With the construction of the project, Sound Transit shall implement the following mitigation measures:

Land use. As discussed in Section 4.1.3 of the EA, the proposed action is not expected to have any adverse land use impacts. Therefore, mitigation measures are not necessary. Sound Transit commits to the following measure to ensure that the design fits appropriately into its surroundings:

- Coordinate planning and design of the station with the City of Tukwila, the City of Renton, and with owners of nearby businesses (e.g. the Boeing Longacres campus).

Transportation. Transportation mitigation measures are discussed in Section 4.2.4 of the EA. By year 2030, increases in background traffic and planned changes to the roadway network would result in degraded levels of service at study-area intersections. The project traffic would add some delay to these locations. However, optimization of traffic signals along the West Valley Highway corridor is expected to offset delay impacts of the proposed permanent commuter rail station traffic. Since the City is responsible for traffic signal operations on state highways, mitigation by Sound Transit is not proposed.

To address street network and parking impacts, Sound Transit will implement the following mitigation measures:

- Construct street frontage and vehicle access improvements to Longacres Way on the project site as part of the project.
- Construct pedestrian access improvements that would enhance the non-motorized environment in the site vicinity, including.
 - A 15-foot sidewalk with landscaped tree wells on the south half of Longacres Way along the frontage of the permanent station property.
 - A 12-foot wide path for non-motorized vehicles and pedestrians connecting the station to Longacres Way.
 - A pedestrian underpass connecting the parking lot and the station platforms. The portion of the pedestrian way that passes under the UPRR tracks would be constructed as part of the UPRR Realignment Project.

- Prepare an updated parking study if it is required by the City of Tukwila Parking Determination.
- Coordinate with other transit providers to improve transit options to the station to reduce the demand for parking.
- Coordinate with the City of Renton and City of Tukwila to implement on-street parking time restrictions, parking enforcement, or other measures to minimize impacts from overflow parking, if and when it occurs.
- Design the station to accommodate a future access to Strander Boulevard, a planned but as yet unfunded arterial overpass adjacent to the south side of the site. Sound Transit has committed \$4,208,000 to the Strander Boulevard Project for HOV lanes and transit queue by-pass lanes on Strander Boulevard.

Social and Economic Impacts: As discussed in Section 4.3.3 of the EA, the proposed action is not anticipated to have adverse social or economic impacts. Therefore, mitigation measures are not needed. However, Sound Transit has committed to the following to help ensure that potential social and economic impacts of construction and operation of the station are avoided or minimized:

- All project elements will be planned and designed in coordination with Tukwila, Renton, local residents, business owners, land owners, and other stakeholders.

Biological Resources: Biological resource mitigation measures are discussed in Section 4.4.4 of the EA.

To address wetland impacts, Sound Transit will implement the following mitigation measures:

- Mitigate for filling Wetland S and its buffer in accordance with applicable permits using one of the following options:
 - a. On-site or off-site wetland mitigation, or
 - b. Purchasing credits from an approved wetland mitigation bank.

Off-site mitigation in a wetland bank is preferred. If appropriate off-site mitigation is unavailable, then an on-site mitigation project may be necessary and will be provided.

- If the City of Renton's UPRR Realignment Project does not occur prior to the Tukwila Commuter Rail Station Project, Sound Transit will provide any required mitigation for impacts to the buffer of Wetland N in accordance with applicable permits. This could include wetland buffer enhancement on or near the project site, or off-site mitigation such as purchasing wetland bank credits.

- Incorporate stormwater detention ponds and rain gardens in the project design to maintain the flood flow alteration functions provided by wetlands in the project vicinity.

To address wildlife and fish impacts, Sound Transit will implement the following mitigation measures:

- Revegetate areas that are not paved or built upon, plant trees in the parking area, and plant the stormwater detention area with appropriate plants to enhance wildlife use as part of the landscape plan.
- Hydroseed the existing railroad embankment after the station platform is complete. as part of the landscape plan
- Use appropriate BMPs to control potential water quality and quantity issues during and after construction as described below under Water Quality and Hydrology.

Water Quality and Hydrology. Water quality and hydrology mitigation measures are discussed in Section 4.5.3 of the EA.

No direct impacts to the Green River or Springbrook Creek are expected as a result of this project. Impacts from stormwater runoff will be minimized with the following mitigation measures:

- Stormwater design will comply with the 2005 *King County Surface Water Design Manual* and the 2005 *King County Stormwater Pollution Prevention Manual* to minimize runoff, sediment, and erosion impacts. The project will comply with local permitting requirements for stormwater design prior to construction, which may include the implementation of measures such as covering stockpiled soils, using sediment traps and ponds, clearing areas just prior to construction, and replanting cleared areas as soon as possible.
- Implement a spill control and prevention plan for all construction areas of the site. The plan should include such measures as clean-up procedures in the event of small and large spills and training for personnel on the reduction and elimination of potential spill sources.
- Wherever possible, minimize on-site refueling areas and areas of fuel or chemical storage. Berm, or curb and line with impermeable materials all refueling areas where possible, and divert drainage away from these areas. Maintain facilities for proper collection and disposal of any waste products, such as used motor oil.
- Install permanent stormwater treatment facilities to treat runoff from one-hundred percent of the new pollution generating impervious surfaces. Storm drainage control will consist of onsite drainage (one pond to the north of the parking area) and low impact development (LID) measures.

- Plant vegetation along the perimeter of the drainage pond to provide shade cover for the stormwater detention pond.
- Detain stormwater in rain gardens along the western side of the parking area to slow the velocity of surface runoff and allow particles to settle out and nutrients to be filtered from runoff.

The project area is outside of the 100-year floodplain as defined in the City of Tukwila's critical areas regulations, which are based on the Federal Emergency Management Administration (FEMA) Flood Insurance Rate Maps (FIRM) currently in effect. However, based on draft Flood Insurance Rate Maps, the project area is located within the 100-year floodplain of Springbrook Creek. If the draft FIRMs are correct, emergency vehicle traffic and excavation routes could be impacted by flooding, and the pedestrian tunnel would be unsafe during a flood event. Minor fill would be necessary on the west portion of the site. If the draft FIRMs are adopted as part of the regulatory compliance required for the project, any floodplain fill will require compensatory floodplain storage. However, compensatory floodplain storage is not currently required. As such, only the following mitigation commitment is required to address floodplain impacts:

- Incorporate stormwater detention ponds and rain gardens in the project to maintain the flood flow alteration functions provided by wetlands in the project vicinity.

Noise. Noise mitigation measures are discussed in Section 4.6.6 of the EA. Because the proposed action is not anticipated to create noise impacts during the operation of the Tukwila Commuter Rail Station Project, no operational noise mitigation is warranted.

Construction noise could temporarily negatively affect people at nearby businesses and facilities. While some noise exemptions do apply to these temporary construction activities, some relatively simple and inexpensive practices could reduce the extent to which people are affected. Sound Transit commits to the following mitigation measures that address noise impacts during construction:

- Reduce construction noise with properly sized and maintained mufflers, engine intake silencers, engine enclosures, and by turning off idle equipment. Construction activities that could negatively affect people at nearby businesses and facilities will be confined to daytime hours when feasible. Specify in the construction contract that mufflers be in good working order and that engine enclosures be used on equipment when the engine is the dominant source of noise.
- Place stationary pumps, compressors, welding machines, and similar equipment in continuous operation as far away from sensitive receiving locations as possible. Where this is infeasible, place portable noise barriers around the equipment with the opening directed away from the sensitive receiving property, as appropriate.

- Obtain and comply with local noise variances that may be required under applicable local noise regulations, if any.

Air Quality. Air quality mitigation measures are discussed in Section 4.7.5 of the EA. Because the proposed Tukwila Commuter Rail Station Project would not result in any adverse air quality impacts in the study area, no operational impact mitigation measures related to impacts in the study area are warranted or proposed.

During construction, the construction contractor(s) will be required to comply with all relevant federal, state, and local air quality laws, and would be required to prepare a plan for minimizing dust and odors sufficiently to comply with PSCAA Regulation I, Sections 9.11 and 9.15.

Sound Transit commits to implement the following mitigation measures to reduce potential air quality impacts during construction of the project.

- Use only equipment and trucks that are maintained in optimal operational condition.
- Require all off-road equipment to be retrofit with emission reduction equipment (i.e., require participation in Puget Sound region Diesel Solutions by project sponsors and contractors).
- Implement construction curbs on hot days when region is at risk for exceeding the ozone NAAQS, and work at night instead.
- Implement restrictions on construction truck idling (e.g., limit idling to a maximum of 5 minutes).
- Locate construction equipment away from sensitive receptors such as fresh air intakes to buildings, air conditioners, and sensitive populations.
- Spray exposed soil with water or other suppressant to reduce emissions of PM10 and deposition of particulate matter.
- Pave or use gravel on staging areas and roads that would be exposed for long periods.
- Cover all trucks transporting materials, wet materials in trucks, or provide adequate freeboard (space from the top of the material to the top of the truck bed), to reduce PM10 emissions and deposition during transport.

- Provide wheel washers to remove particulate matter that would otherwise be carried off-site by vehicles to decrease deposition of particulate matter on area roadways.
- Remove particulate matter deposited on paved, public roads, sidewalks, and bicycle and pedestrian paths as a result of the project construction in order to reduce mud and dust; sweep and wash affected streets regularly as needed during construction to reduce emissions.
- Cover dirt, gravel, and debris piles as needed to reduce dust and wind blown debris.
- Route and schedule construction trucks to reduce delays to traffic during peak travel times to reduce air quality impacts caused by a reduction in traffic speeds.

Archaeological and Cultural Resources. Mitigation measures to reduce the potential for impacts to archaeological and cultural resources are discussed in Section 4.8.3 of the EA. No evidence of cultural resources was identified within the proposed station site.

Sound Transit will implement the following mitigation measures to protect resources if any are uncovered:

- Site excavation which extends below fill and into native soils will be monitored by a professional archaeologist.
- If archaeologically significant resources are encountered during proposed project construction, work shall be halted while DAHP is consulted to determine an appropriate course of action.
- Tribes with jurisdiction shall be notified in the event potentially significant Native American cultural resources are discovered during excavations.
- Sound Transit and FTA will prepare an Inadvertent Discovery Plan to be followed during station construction for excavations into potential native soils.

Geology and Soils. Mitigation measures to reduce geology and soil hazards are discussed in Section 4.10.3 of the EA. During a seismic event, alluvial soils underlying the site can lose cohesion and liquefy or settle. Structures built on these soils could be damaged as a result of these movements.

Sound Transit makes the following mitigation commitments to address potential liquefaction or settling impacts to station facilities:

- Implement proper subgrade preparation in embankments and paved areas, and adopt modern earthquake-resistant building methods and practices for station-related structures to help minimize the potential for damage to structures or pavement during seismic events.
- Establish emergency procedures that would detail specific responses to seismic events. The responses shall include evacuating station facilities and inspecting the facilities for earthquake damage. Emergency procedures shall be planned in coordination with local emergency service providers.

Utilities and Public Services. As discussed in Section 4.11.3 of the EA, careful coordination would help minimize impacts to utility and service providers during construction. Sound Transit makes the following commitment to mitigate impacts on public services and utilities.

- Coordinate with public services and utility providers through development of specific construction-related mitigation measures such as avoidance, scheduling of temporary disruptions, or replacement of facilities. Coordination shall be on-going throughout the construction process.

Safety and Security. Mitigation measures for safety and security concerns are discussed in Section 4.12.3 of the EA. Sound Transit commits to the following mitigation measures:

- Station design and orientation on the site will allow waiting areas to be visually accessible by police and security patrol cars from adjacent streets and populated areas.
- Station entrance locations will provide easy access from Longacres Way (with a potential future access way connection proposed at Strander Boulevard), allowing monitoring by other passengers and system personnel.
- Shelters will be well lit, well maintained, and patrolled by a transit security force to ensure passenger safety at waiting areas.
- Emergency telephones will be readily available for individuals to call for help if needed.
- Closed circuit television (CCTV) cameras and monitors will be used to monitor activity at the station.
- For on-board security, passengers will be informed and educated on personal safety practices when using transit.
- The proposed self-service fare system will provide added passenger security on commuter trains and buses. Self-service fare systems require transit personnel to be present on the vehicles. These individuals, by their presence, will help to deter

criminal behavior, and will have the means to respond or react to problem situations as they occur.

- The CCTV, security patrols, and train personnel described above will also help to watch for possible flooding problems in the pedestrian tunnel. Should flooding occur, train operators will be notified so that passengers would not be deboarded on the east platform and become stranded.
- Soils reports for bridges will be used to identify known earthquake faults in the area, geologic-seismic features of the area, potential for liquefaction, depth of bedrock and recommended design acceleration at the site.
- All structures will be designed and built according to the most current seismic design standards.
- Emergency procedures for responding to earthquakes shall be established. In the event of an earthquake, track work and bridges would need to be inspected thoroughly but rapidly, so service can resume as soon as it is safe to do so.
- Train operators shall be trained in emergency inspection procedures, including visual inspection of the line and checking the condition of the rails, signals and switches. The initial assessment would be followed by a detailed inspection process where track service crews are deployed along the corridor. The crews would conduct close inspections of each track section to detect changes in the alignment of the rail and ties, broken bolts, downed wires, and damage to retaining walls, embankments, bridges or other structures.
- Sound Transit shall follow Federal Railroad Administration (FRA) track safety standards and BNSF safety standards.
- Develop a safety plan for the proposed commuter rail station prior to the start of operations at the new station. This plan is to be developed in cooperation with Sound Transit Security staff and BNSF, and will involve coordination with all local police and fire departments to ensure that emergency access routes and procedures are understood by all parties. The safety plan will also include detailed plans for the evacuation of trains and station areas in the event of an emergency.

Hazardous Materials. As described in Section 4.14.4 of the EA, the commuter rail service will not transport hazardous materials, therefore, no mitigation measures for operation of the Tukwila Commuter Rail Station Project are proposed. In addition, exposure of the public to hazardous materials during construction is not expected to occur. Construction could pose a risk of small spills, however, from on-site machinery.

Sound Transit commits to the following measures to mitigate for the potential of encountering hazardous materials during construction:

- Prepare a site safety plan, and spill prevention and countermeasures plan. Ensure that personnel are trained to recognize potential hazards. If hazardous substances are encountered, they should be addressed in accordance with applicable regulations.
- Spill control plans and other site safety measures shall be implemented as part of the construction process.
- If any suspected contamination is encountered, use proper protective equipment (clothing, gloves, breathing equipment, etc.) and other measures consistent with federal and state standards to provide a safer working environment for construction workers.