



## RESOLUTION NO. 39981

1 BY REQUEST OF MAYOR WOODARDS

2 A RESOLUTION relating to transportation; approving the execution of a negotiated  
3 Partnership Agreement with Sound Transit for the purpose of enhancing  
4 coordination on the planning, design, and construction of the Tacoma Dome  
Link Extension Project.

5 WHEREAS the Sound Transit 3 ("ST3") high-capacity transit system  
6 expansion, approved by voters in November 2016, includes a variety of projects to  
7 be implemented over the next 25 years, and  
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9 WHEREAS connecting the South Sound area and the second largest city in  
10 the region to the Puget Sound light rail spine is critical to our success and the  
11 region's long-term success, and

12 WHEREAS Tacoma is committed to implementing the principles of the state  
13 Growth Management Act and the regional growth and transportation strategies  
14 (Vision 2040, Transportation 2030, and their updates), of which a key component  
15 is ensuring that we link infrastructure investments and growth in a way that  
16 reduces our dependence on single-occupancy vehicles and growing commutes,  
17 and  
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19 WHEREAS these high-capacity connections are absolutely key to providing  
20 the full menu of transportation alternatives necessary to meeting the needs of our  
21 growing population in a more sustainable, flexible and resilient way, and  
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23 WHEREAS it is critical to recognize that these types of substantial  
24 investments are fifty plus year decisions on investments that are made only once  
25 every few generations, and  
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1 WHEREAS the decision making process must be strategic, thoughtful, and  
2 collaborative, with the entire community and particularly with the Puyallup Tribe,  
3 one of our most significant community partners, and

4 WHEREAS, we must understand that these types of projects have the  
5 power to create, shift and catalyze growth in communities and to create value and  
6 opportunity for some, but the past also shows us that such projects, if done without  
7 sufficient consideration, can divide communities, exacerbate equity issues, and  
8 reduce value and opportunity for others, and

9 WHEREAS, the City is fully committed to getting this done on schedule, if  
10 not sooner, and within available resources, but we are even more committed to  
11 getting it right, and

12 WHEREAS Tacoma is supportive of the intent of identifying a preferred  
13 alternative early in the process as a mechanism to facilitate a streamlined  
14 environmental review and design process, but recognizes that this type of early  
15 decision-making is going to necessitate that the process is grounded in equitable  
16 community engagement and is designed to get broad consensus and buy-in, at the  
17 legislative, administrative, and public levels, and

18 WHEREAS all parties must recognize that this is part of a regional system  
19 that also has local impacts, it is critical to ensure that the process reflects a  
20 balance of regional perspectives and local perspectives, and the process must be  
21 very clear about what decisions are being made at what points in the process, and  
22 what the criteria are that are used to make such decisions, and  
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1 WHEREAS, the decision making process must ensure the validity and  
2 strength of the resulting decisions by making them only after significant analysis of  
3 the various alternatives and the potential benefits, costs and tradeoffs, and

4 WHEREAS Tacoma is committed to a project design and station locations  
5 that directly promote ridership and efficient service while also catalyzing transit-  
6 oriented development and supporting multi-modal access and connectivity,  
7 economic opportunity, housing affordability, social equity, healthy communities,  
8 environmental sustainability, and the preservation and support of unique cultural  
9 and community character, and

10 WHEREAS the Alternatives Analysis shall be comprehensive enough to  
11 examine all viable alternatives to facilitate the best long-term decision, and shall  
12 include the specific elements enumerated in this Resolution, and

13 WHEREAS the Alternatives Analysis shall include an examination of  
14 consistency with regional transportation and land use plans and the City's adopted  
15 policies and plans, including the One Tacoma Plan, the Transportation Master  
16 Plan, and the South Downtown Subarea Plan, and

17 WHEREAS the Alternatives Analysis shall include early consideration of key  
18 environmental, economic and operational impacts and issues, and

19 WHEREAS the Alternatives Analysis shall include options that effectively  
20 connect Tacoma's Eastside and its current and future residents, employment, and  
21 destinations  
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23 WHEREAS the Alternatives Analysis shall include examination of how this  
24 project will integrate, interact and support the other transportation systems and  
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1 modes in the station areas, particularly near the Tacoma Dome Station, which is  
2 the most concentrated multi-modal hub in the region with Tacoma LINK, Sounder  
3 Commuter Rail, Pierce Transit, Intercity Transit, Greyhound, Amtrak and planned  
4 Bus Rapid Transit service, and

5 WHEREAS the Alternatives Analysis shall include recognition that this is not  
6 the endpoint of this system, and project design needs to reflect and facilitate future  
7 expansions to the City's other growth centers, as well as potential improved  
8 connections to the Downtown Core and potential connections to other communities  
9 in the South Sound, and

10  
11 WHEREAS implementing the ST3 plan consistent with the scope, budget,  
12 and schedule approved by the voters will require coordination and collaboration by  
13 Sound Transit and its federal, state, and local partners, and

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15 WHEREAS Sound Transit is beginning the initial planning phases for the  
16 STE Project, and the City will play a key role as one of the primary partners for this  
17 multi-jurisdictional transit project, and

18  
19 WHEREAS the ST3 plan includes the Tacoma Dome Link Extension  
20 ("TDLE") Project, which includes two key elements: (1) the Central Link light rail  
21 expansion from Federal Way to the Tacoma Dome area; and (2) a Light Rail  
22 Operations and Maintenance Facility along the Federal Way-to-Tacoma corridor,  
23 and

24  
25 WHEREAS, in order to facilitate a smooth planning, design, and  
26 construction process, Sound Transit is pursuing Partnership Agreements with each



of the jurisdictions along the route, and moving the Alternatives Analysis phase to  
1 earlier in the process, and

2 WHEREAS these changes will allow for more and earlier community and  
3 inter-jurisdictional engagement, with the intent of ensuring that solid, supported  
4 decisions can be made progressively through the process and then sustained as  
5 the design and development process continues forward, and  
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7 WHEREAS providing early direction on City/local priorities and issues is one  
8 way the City can support the shared goal of moving the project forward efficiently  
9 and ensuring that it results in a regional transit project that appropriately balances  
10 and best meets both regional and local goals, and  
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12 WHEREAS this issue was presented to the Planning Commission at its  
13 meeting of February 21, 2018; to the Infrastructure, Planning and Sustainability  
14 Committee at its meeting of February 28, 2018; and to the City Council at its Study  
15 Session of March 20, 2018, with input from those discussions incorporated herein,  
16 particularly as it relates to the stated City/local goals and interests, and  
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18 WHEREAS this formalized partnership expresses the City's general  
19 commitment to the TDLE Project, as well as a commitment to work cooperatively  
20 with Sound Transit and the other jurisdictions on planning, design and construction  
21 of the project; and will provide early direction and input on high-level City/local  
22 goals and interests that should be considered as part of the upcoming planning  
23 process, and  
24

25 WHEREAS, while it would be outlined in detail through a future, separate  
26 agreement, the proposed Partnership Agreement incorporates a commitment from



Sound Transit to reimburse the City for staff costs associated with future services that support the TDLE Project; Now Therefore,

BE IT RESOLVED BY THE COUNCIL OF THE CITY OF TACOMA:

1. That the Recitals of this Resolution are hereby adopted as the Council's legislative findings regarding the Alternatives Analysis.

2. That the proper officers of the City are hereby authorized to execute the Partnership Agreement with Sound Transit for the purpose of enhancing coordination on the planning, design, and construction of the Tacoma Dome Link Extension Project, said document to be substantially in the form of the agreement on file in the office of the City Clerk.

Adopted APR 10 2018

W Woodard  
Mayor

Attest:

Dennis Berum  
City Clerk

Approved as to form:  
[Signature]  
Deputy City Attorney

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## RESOLUTION NO. 40303

1 BY REQUEST OF MAYOR WOODARDS, DEPUTY MAYOR McCARTHY, AND  
2 COUNCIL MEMBERS HUNTER AND THOMS

3 A RESOLUTION authorizing the use of up to \$75,000, budgeted from the  
4 1065 Street Fund, to establish a broad-based advisory group to make  
5 recommendations on the various projects impacting regional and local  
6 public transportation facilities in Transit Oriented Development areas; and  
7 directing the City Manager to negotiate and execute an agreement with a  
8 consultant, outlining the scope of work and deliverables for said funding.

9 WHEREAS recent investments in traffic infrastructure within the City has  
10 created Transit Oriented Development (“TOD”) opportunities in neighborhoods  
11 and business districts, and

12 WHEREAS residents and business owners near these TOD areas are  
13 concerned that they are not being adequately consulted about how the  
14 investments will integrate into the City, and seek a clearer role, and

15 WHEREAS it is envisioned that a Transit Oriented Development Advisory  
16 Group (“TODAG”) would provide the broader experience necessary to review  
17 major projects, and the residents and business owners near these TOD areas  
18 desire to shift their representation to the TODAG for the review of three major  
19 projects: the Sound Transit Central Link extension, the Pierce Transit Bus Rapid  
20 Transit (BRT) service, and the City’s pending Puyallup Avenue design project,  
21 and

22 WHEREAS proposals by the TODAG will be forwarded to and reviewed by  
the City’s Transportation Commission, for concurrence with adopted  
transportation and land use plans and policies, and



1 WHEREAS, if the TODAG is established, it is anticipated that the group will  
2 require consultant services to manage meetings and provide expertise, as  
3 necessary, and

4 WHEREAS consultant tasks are dependent on the Central Link and BRT  
5 project schedules, and there is a need for expediency in the creation of the  
6 TODAG to meet these timelines in order to allow for citizen engagement to occur in  
7 tandem with project planning efforts, and

8 WHEREAS this proposal assumes a 24-30 month schedule, with an  
9 anticipated cost of \$125,000 to \$180,000, of which \$75,000 would be for the first  
10 phase of the proposal, and

11 WHEREAS the proposed funding is anticipated to cover costs for a one-  
12 year period, and the City Council and City staff will seek out investments from  
13 partner agencies and seek to identify other funding sources to fund the entire  
14 timeline of this project, and

15 WHEREAS City staff will negotiate and execute an agreement for consultant  
16 services, outlining the terms and deliverables for the City's contribution; Now,  
17 Therefore,

18 **BE IT RESOLVED BY THE COUNCIL OF THE CITY OF TACOMA:**

19 Section 1. That the use of up to \$75,000, budgeted from the 1065 Street  
20 Fund, for the purpose of establishing a broad-based advisory group to make  
21 recommendations on the various projects impacting regional and local public  
22 transportation facilities in the Transit Oriented Development areas, is hereby  
approved.



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Section 2. That the City Manager is hereby directed to negotiate and

execute an agreement with a consultant for the purposes hereinabove  
enumerated, outlining the scope of work and deliverables for said funding.

Adopted \_\_\_\_\_

\_\_\_\_\_  
Mayor

Attest:

\_\_\_\_\_  
City Clerk

Approved as to form:

\_\_\_\_\_  
Deputy City Attorney





April 17, 2019

Elma Borbe  
Sound Transit  
401 S. Jackson Street  
Seattle, WA 98104

RE: Tacoma Dome Link Extension Scoping Comments

Dear Ms. Borbe:

Thank you for the opportunity to share our thoughts in regards to the scoping for the Tacoma Dome Link Extension (TDLE) project.

The City of Tacoma's Planning Commission has been actively involved in the TDLE process. We have a Commissioner designated to the Stakeholder Group, another Commissioner involved in the Interagency Group (not representing the Commission, but the Puyallup Tribal Administration), Commission liaisons (i.e., City of Tacoma staff) involved in the Interagency Group, and other Commissioners participating in the project as interested citizens. We also appreciate the fact that Sound Transit updated the Planning Commission and the Transportation Commission about the project during a joint session of the two Commissions on March 20, 2019.

We understand that the TDLE project is at a critical juncture, wherein the Sound Transit Board will make decisions in July 2019 on preferred station locations and alignments and any alternatives to move forward into the Environmental Impact Statement (EIS) phase. Recognizing this significance, it is important for the Planning Commission to identify which station locations and alignments we would want to see studied further and any environmental or design considerations that should be specifically addressed in the EIS.

We would like to offer the following thoughts for your consideration. These thoughts were formulated based on the deliberations of the Planning Commission, conducted in coordination with the Transportation Commission.

**East Tacoma Station Area:**

- 1. Preferred Alternatives** – Our preferred station locations and alignments for the East Tacoma Station Area to move into the EIS process are "ET3A/3B – East 26<sup>th</sup> Street", which are the alternatives with more potential as indicated in the preliminary conclusion that Sound Transit has been able to reach through Level 1 and Level 2 analyses and community outreach. A lot of the discussion about the East Tacoma Station relates to the desire to effectively serve neighborhoods of Tacoma's east side and specifically the Lower Portland Avenue Mixed-Use Center. To that end, route alignments and station locations were offered south of I-5 for consideration. However, there appeared to be numerous obstacles to these locations, and the Stakeholder Group suggested eliminating these options from consideration. For the remaining potential station locations, there are challenges to siting and designing a station north of I-5 so that it is readily and easily accessible.

- 2. Connection to Lower Portland and McKinley Hill** – Sound Transit should strengthen the pedestrian, bike and transit connections from the station area to the Lower Portland Avenue Mixed-Use Center, particularly on Portland Avenue, East R Street, and Bay Street. We acknowledge that there is strong community desire for a pedestrian bridge over I-5 at East R/Bay Streets. In addition, East L Street should be identified as an important potential access route for people using the station traveling to/from the McKinley Hill area. Sound Transit should consider ET3 station design options that might bridge Portland Avenue with access portals on each side of the street, which could facilitate better linkages to potential development areas on both sides of Portland Avenue and added accessibility for those traveling from McKinley Hill.
- 3. Parking** – The lack of parking at the East Tacoma station area will significantly impact the ridership of the TDLE. We acknowledge, value and support Sound Transit's and the City's efforts in promoting the use of public transportation and enhancing the intermodal connections. However, as much as we would like to believe that the need for parking will soon be a thing of the past, the market is not moving that way very quickly. The need for parking in the area will remain for many years to come. The parking issue should be carefully assessed in the EIS and properly mitigated.
- 4. Street Network** – The existing street network and traffic patterns make this area difficult and ill-suited to locating and accessing a station. Sound Transit should work closely with the City of Tacoma on larger street network/grid improvements and reconfiguration to better serve station access and address traffic flow issues in the area.
- 5. Station Design** – Station design is an opportunity to create a new identity for this area with station architecture that makes a proud statement. We implore Sound Transit to honor this aspiration and fully engage the community in the station design.
- 6. Vision and Zoning** – The current zoning and land-use patterns are not ideal for the type of development generally desired immediately adjacent to a station location. If a station is to be sited here, a larger community conversation should consider how to re-envision and re-invest in this area. The station could be the impetus to redesign some of the streets and intersections to better serve traffic flow, station access, and create a more pedestrian-friendly development area. The Planning Commission and the community as a whole should reconsider the vision and zoning for this area based on the impact and potential benefits of the station location. Particularly, rezoning might be considered for the area north of I-5 between East R/Bay Streets and East L Street up to the existing freight tracks. We encourage Sound Transit to participate in and contribute to the discussion.
- 7. Future Connection to East Side** – From east side stakeholders, the importance of multimodal connections and how transit might integrate with a station was a recurring comment. Worthy of consideration would be how a future expansion of the Tacoma Link (streetcar) or a Bus Rapid Transit (BRT) line serving the Tacoma east side might integrate with such improvements.

**Tacoma Dome Station Area and Future System Expansion:**

- 8. Cut-and-Cover Consideration** – There are many important considerations to the siting of the TDLE facility in the Tacoma Dome Station Area, however, one of the first key questions is "What type of station is appropriate for this neighborhood?"

To the question, the elevated station and alignment alternatives as currently presented should be a non-starter. An elevated solution may be technically feasible and probably cost advantageous,

however, we have concern for both the visual and development impacts on the current and future neighborhood. The Dome District cannot accommodate additional at-grade crossings in an area already congested with vehicular, rail, and streetcar traffic. There are route alignments and station locations among the presented alternatives that because of topography are likely more viable for below-grade stations.

We believe a below-grade, cut-and-cover station and track facility is more appropriate to the urban fabric, urban design, the sense of place, the intermodal connectivity, and the level of residential and commercial development envisioned for the Dome District. We strongly recommend that the cut-and-cover alternative be further studied in the EIS process. The cut-and-cover consideration fulfills and reinforces many policies and provisions articulated in various elements of the *One Tacoma Plan*, the City of Tacoma's Comprehensive Plan, as exemplified below:

- The cut-and-cover facility can be reasonably construed as a type of "utility" as referred to in this policy: "Whenever feasible, ensure that utilities in designated centers, business districts, and priority pedestrian areas are undergrounded." (Policy PFS-7.15, Public Facilities and Services Element, p. 9-18)
- In the same way, the cut-and-cover can be considered an action to "prioritize undergrounding of utilities in designated centers" that would "reduce and minimize visual clutter related to utility infrastructure." (Policies DD-6.6 and DD-6.5 respectively, Design and Development Element, p. 3-18)
- The cut-and-cover concept is intended to "design for people" and "encourage a creative approach to density." ("Overall Urban Design Goals", Downtown Element, p. DT-45)
- The cut-and-cover facility would "infuse the City's built environment with creative expression and design that encourages expressions of creativity and results in vibrant public spaces where people want to be." (Goal DD-14, Design and Development Element, p. 3-27)
- The cut-and-cover facility supports this policy: "Centers must remain compact enough to increase densities, facilitate economical and efficient provision of utilities, public facilities and services, and support more walking, bicycling, and transit use." (Policy DD-5.17, Design and Development Element, p. 3-15)
- The cut-and-cover facility would help achieve this policy: "Encourage transit stations in centers to provide high density concentrations of housing and commercial uses that maximize the ability of residents to live close to both high-quality transit and commercial services." (Policy UF-9.4, Urban Form Element, p. 2-47)
- The cut-and-cover facility presents a great opportunity to be "located and designed to complement the aesthetics, social interactions and urban design of the community." ("Designed and Located for Community Values", Public Facilities and Services Element, p. 9-17)
- The cut-and-cover facility avoids the concern that "as the downtown grows, poor siting of bulky or tall buildings can adversely impact the environmental quality of surrounding public realm through the loss of sky view and shadowing." ("Livability Criteria to Guide Building and Public Realm Design", Downtown Element, p. DT-23)

- The cut-and-cover consideration implements this policy: "In collaboration with Pierce Transit and Sound Transit design transit stops and inter-modal connections integrated with the public realm, providing gathering spaces and an improved end-to-end transit experience." (Policy 2.3G.A, Downtown Element, p. DT-34)

We have heard conversations during Stakeholder Group meetings and community open houses that suggest cut-and-cover a potentially viable option. We urge Sound Transit to pursue this in the next phase; if not, there will not be the same level of analysis done on both elevated options and below-grade options for the Sound Transit Board to make an informed final decision.

- 9. Over-the-Sounder Consideration** – The Over-the-Sounder concept has also been brought up as a potentially viable option for the TDLE alignment in the Tacoma Dome Station area. With this option, an elevated track facility would be constructed along and above the existing Sounder Commuter tracks and an elevated station adjacent to Freighthouse Square. Similar to the cut-and-cover option, the Over-the-Sounder option would result in less impact to the urban fabric, streetscape, and development potential for the area than would elevated alternatives running above existing street corridors. The elevated station would provide the same intermodal connectivity as the existing commuter rail station to the E. 25th Street and Puyallup Avenue area, while allowing more effective connections to the uphill area near E. 26th Street and Tacoma Dome. We encourage Sound Transit to think outside the box and include the Over-the-Sounder option in the EIS evaluation process.
- 10. Future Expansion** – Another key factor in the consideration for the siting of the TDLE facility in the Tacoma Dome Station Area is the future potential expansion of the system into the Tacoma Mall Regional Growth Center area and beyond. We appreciate the fact that the study for such expansion has been funded in the ST3 package and Sound Transit has already factored the future expansion in all alternatives as currently presented. However, how an alignment would cross I-705, one of the determining factors for alignment selection, does not seem to have been explicitly articulated in the Level 2 evaluation. We recommend that this issue be specifically addressed in the EIS. Furthermore, we would like to draw your attention to the Brewery District. As anticipated in the *One Tacoma Plan* (Urban Form Element, p. 2-21), the Brewery District is situated between the UWT/Museum District and the Dome District, and has the potential to serve as an important connector between them while it continues to develop into a higher intensity transit-oriented neighborhood in its own right. In recognition of the City's desire to better serve downtown as a residential and employment center, we suggest that Sound Transit consider incorporating a South Downtown/Brewery District Station (perhaps near Tacoma Avenue and S. 27th Street) in the future expansion of the line. This could require a segment of tunnel as part of the alignment which seems more feasible if a below-grade station is the solution for the Tacoma Dome Station Area.
- 11. Preferred Alternatives** – If the cut-and-cover option is moved forward for EIS evaluation, the station location alternatives would be identified and determined, depending on the alignment of tracks and tunnels, the surface access points, underground utilities, water table, topography, and many other factors. We would suggest that "TD4 – East 26th Street In-street" may be a viable, competitive alternative, based on grade changes and due to its centralized location from the surrounding transportation facilities, tourist attractions, and residential and commercial development. If the elevated type of facility is to be moved forward, our preferred alternative is "TD2 – 25th Street West", which is identified as one of the alternatives with more potential. We acknowledge that "TD3 – 25th Street East" is also identified as an alternative with more potential. We do not

necessarily object to that notion, nor would we rule out the possibility of the final station location (if this alignment is selected) being somewhere between TD2 and TD3. We would submit that TD3 may not allow as full an opportunity as TD2 for transit-oriented development near the station area and seamless connections between other modes.

**12. Parking** – The existing parking garages at the Tacoma Dome station area have been well utilized and operating at capacity on a regular basis. The anticipated lack of sufficient parking in the area will significantly impact the ridership of the TDLE. We acknowledge, value and support Sound Transit's and the City's efforts in promoting the use of public transportation and enhancing the intermodal connections, especially in the Tacoma Dome Station area, which is one of the principal multimodal transportation hubs of the region. We are also fully aware and supportive of the vision for the Dome District area which is to continue to grow and develop into a true urban environment. However, as much as we would like to believe that the need for parking will soon be a thing of the past, the market is not moving that way very quickly. The need for parking in the area will remain for many years to come. The parking issue should be carefully assessed in the EIS and property mitigated.

**13. Station Design** – Station design is an opportunity to create a new identity for this area with station architecture (elevated option) or station entrance plaza (below-grade option) that makes a proud statement and reinforces the fact that this is the most urban station location in the South Corridor. We implore Sound Transit to honor this aspiration and fully engage the community in the station design.

**14. Additional Factors** – In addition to the aforementioned suggestions, we would offer the following factors for Sound Transit's consideration for the evaluation and selection of station locations and alignments:

- All potential station locations in the Dome District are in very close proximity to one another. The primary considerations from an advantages and disadvantages standpoint should be how the station would integrate with transfer to other modes and what impact an alignment and station location would have on the character of this area and development potential.
- To achieve the Dome District's vision as a dense urban neighborhood, it is critical that the TDLE project be integrated in a way that facilitates a tight-knit collection of residential, commercial, and institutional uses that maximize the use of private property. Therefore, preference should be given to station locations and alignments that utilize rights-of-way (ROWs) and minimize impact to parcels and their potential development.
- Visual impacts of elevated station and track alignment on the Dome District should be sensibly addressed. This includes the visual impacts of the tail-segment of the track facility reserved for the train switch-back operation and future expansion of the line.
- The Dome District street network is already congested and complicated with frequent signaled intersections, shallow blocks, and track crossings for the streetcar and rail. A grade separated solution should be considered.
- Consideration for the siting of the station and how it relates to transit connections and points of access are critical. This includes a better understanding and analysis of routes of

travel to the district from Downtown and from South Tacoma via South Tacoma Way/26th Street or from McKinley Hill via D Street.

The Tacoma Dome Link Extension is a 50+ year investment. We applaud Sound Transit for striving to fully engage the community and collaborate with jurisdictions and agencies in the development of this important transportation project. Tacoma, as the largest growth center of the South Puget Sound, is a destination served by TDLE, not just a terminal on the line. While we appreciate Sound Transit's conduct of business in a pragmatic and fiscally responsible manner, we encourage Sound Transit to envision big, look long-term, think outside the box, and stay flexible.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen Wamback". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stephen Wamback, Chair  
Tacoma Planning Commission

- c. Mayor Victoria Woodards and Members of the Tacoma City Council
  - Elizabeth Pauli, Tacoma City Manager
  - Co-Chairs Jane Moore and Gerrit Nyland and Members of the Tacoma Transportation Commission
  - Brian Boudet, Planning Manager, Tacoma Planning and Development Services Department
  - Lisa O'Hanlon, Tacoma Government Relations Office
- Pierce County Representatives on the Sound Transit Board of Directors:
  - Bruce Dammeier, Pierce County Executive
  - Kent Keel, University Place Mayor
  - Kim Roscoe, Fife Mayor
  - Victoria Woodards, Tacoma Mayor



City of Tacoma  
Transportation Commission

April 24, 2019

Ryan Mello, Chair  
Infrastructure, Planning, and Sustainability Council Committee  
747 Market Street, Suite 1000  
Tacoma, WA 98402

Re: Sound Transit Tacoma Dome Link Extension

Dear Chair Mello,

Formed in 2013, the City of Tacoma Transportation Commission leads community efforts to ensure the transportation system investments in the City of Tacoma prioritize safety, efficiency and effectiveness. This letter identifies Tacoma Dome Link Extension station location preferences, and the rationale behind those choices.

In 2016, the Transportation Commission urged the City Council and then Mayor Strickland to fight for Tacoma Dome Link Extension completion by 2028. While the plan is for 2030, this Commission continues to prize timely completion, which requires focusing on only the most desirable locations. Therefore, the Transportation Commission recommends advancing just two elevated station locations at the East Tacoma Station and two elevated station locations at the Tacoma Dome Station for analysis in the next stage. The following recommendations prioritize safe and speedy pedestrian access to destinations and other modes of transit.

**City of Tacoma Transportation Commission Recommendation 1**

- Move forward East Tacoma Stations ET3A and ET3B for further analysis, with neither being prioritized as our top priority.

**City of Tacoma Transportation Commission Recommendation 2**

- Move forward Tacoma Dome Station TD2 as our top priority and Tacoma Dome Station TD3 as a secondary priority for further analysis.

For Recommendation 1, the Transportation Commission prefers the East Tacoma Stations ET3A and ET3B. These stations provide the best pedestrian connection to residential development in East Tacoma and to the Puyallup Tribe of Indians casino, a major employment and regional destination. With changing zoning to the west and north of the ET3A and ET3B station positions, this location also promotes future development. In addition to recommending these locations, the Transportation Commission highly recommends:

- A grade separated pedestrian route to the station from both the east and west side of Portland Avenue.

- An enhanced pedestrian and bicycle route to the south, either over I-5 or along existing routes under I-5 with improvements for both safety and the perception of safety.
- Design a pedestrian and bicycle route to the north to connect with the future Tacoma to Puyallup connection.

The other East Tacoma options fail to adequately connect to the East Tacoma neighbors, the primary target of this station location.

For the station location choices in Recommendation 2, the Transportation Commission prioritizes safe and efficient pedestrian movement between the Link, fixed route service, the new Bus Rapid Transit, the Tacoma Link, parking, the Sounder, Sound Transit Express buses, taxis and ride shares. While other stations may appear advantageous, they provide challenges that would cause riders to navigate multiple grade connections (more than one elevator or escalator needed), vehicular conflicts, and longer distances.

Furthermore, TD2 provides the least impact to current and future development. Other stations may require right of way acquisition that would demolish current structures or prevent development in an area designed for density. TD2 also appears to best provide for the potential future Link extension toward the Tacoma Mall area, a continuing Transportation Commission priority.

In designing TD2, the Transportation Commission highly recommends the routes between the Light Rail Platform to the platforms of other modes of transit include:

- No more than one elevator ride.
- No pedestrian/vehicular conflicts.
- A covered route.

Additionally, the Commission recognizes the historic importance of this area in relation to the Puyallup Tribe of Indians. This project should take the utmost care to work in consultation with the Puyallup Tribe of Indians to provide the least amount of disruption to the members of the Tribe, their historical lands, their reservation, and the lands they own.

Overall, the East Tacoma Station options ET3A and ET3B combined with the Tacoma Dome Station option TD2 provide the best connection to local and regional destinations, allow pedestrians the most efficient and safest routes, and will minimize issues that may prevent on-time and on-budget completion. For these reason we urge Sound Transit to choose these stations for additional analysis in the Environmental Impact Statement.

Sincerely,



Dr. Jane Moore  
Co-Chair  
Transportation Commission



Gerrit Nyland  
Co-Chair  
Transportation Commission

cc: Mayor Victoria Woodards  
Tacoma City Councilmembers  
Tacoma City Manager  
Steve Wamback, Planning Commission Chair  
Claire Chase, Sound Transit



**Tacoma** City of Tacoma  
Office of Sustainability

April 25, 2019

Sound Transit  
Elma Borbe  
401 S. Jackson Street  
Seattle, WA 98104

Dear Elma,

Thank you for the opportunity to comment during the Tacoma Dome Link Extension (TDLE) Environmental Impact Statement scoping period.

The Sustainable Tacoma Commission is appointed by Tacoma City Council, and is tasked with ensuring the City's commitment to the locally adopted Environmental Action Plan. Critical to that plan is a goal to reduce greenhouse gas emissions by 40% from 1990 levels by 2020 and by 80% from 1990 levels by 2050.

The STC believes that TDLE light rail alignments and station locations should be evaluated for:

1. Potential impact to the climate via greenhouse gas emissions from operations and passenger access, and
2. Potential impacts due to climate change on built infrastructure for light rail.

While Sound Transit has committed to operate Link light rail from renewable energy sources, the mode split of how passengers will access regional light rail stations is an externality that should be addressed when evaluating station placement and design alternatives. Per-passenger carbon impact of station access should also be measured in the 2030 timeframe. The STC strongly believes that all cost-effective measures should be taken to enable seamless integration between high capacity transit modes (Bus Rapid Transit, Link Light Rail, and Tacoma Link), local bus, and non-motorized modes such as biking and walking. This arrangement will reduce air pollution and congestion, maximize ridership, enable convenient transfers between modes, and make the most use of these public investments.

To that end we encourage further study of the TD2 and TD4 East In-Street stations at Tacoma Dome Station and the ET3A/B stations in East Tacoma to support either a 25th Street or 26th Street terminus option at Tacoma Dome.

Given the proximity to Commencement Bay and the Puyallup River, the STC believes that Sound Transit should consider the results of the Washington Climate Impacts Group study regarding regional sea level rise (Source: <http://www.wacoastalnetwork.com/wcrp-documents.html>). We request that Sound Transit take this information into account to ensure that project infrastructure can be constructed without geological or hydrological complications, enabling a 2030 delivery date for light rail service, and to secure a reasonable cost of keeping the light rail system in a good state of repair.

We look forward to seeing the results of Sound Transit's Level 3 Analysis in the coming months and for additional opportunities to comment on the EIS process.

Respectfully,



Lexi Brewer, Co-Chair, Sustainable Tacoma Commission  
Chris Karnes, Co-Chair, Sustainable Tacoma Commission

CC: Mayor Victoria Woodards  
Tacoma City Council Members  
Elizabeth Pauli, City Manager  
Michael P. Slevin III, Director, Environmental Services Department  
James Parvey, Division Manager, Office of Environmental Policy and Sustainability  
Kristin Lynett, Office of Environmental Policy and Sustainability, Sustainable Tacoma Commission  
Alisa O'Hanlon, Government Relations Department  
Jennifer Kammerzell, Public Works Department, Tacoma Transportation Commission  
Lihuang Wung, Planning & Development Services Department, Tacoma Planning Commission  
Lexi Brewer, Co-Chair, Sustainable Tacoma Commission  
Chris Karnes, Co-Chair, Sustainable Tacoma Commission  
Sagar Ramachandra, Sound Transit



City of Tacoma  
City Manager

May 1, 2019

Elma Borbe  
Sound Transit  
401 South Jackson Street  
Seattle, WA 98104

RE: Tacoma Dome Link Extension – Scoping Comments

Dear Ms. Borbe:

Development of the Tacoma Dome Link Extension (TDLE) is a landmark investment for Tacoma and for the Puget Sound region. Communities in the South Sound have been waiting for completion of the LINK “Central Spine” since before ST2. This project will finally connect that spine to the second largest city in the Puget Sound and with the comprehensive web of transportation options that weave the South Sound together and with destinations far beyond.

In recognition of the importance and the City of Tacoma’s role in the successful delivery of the project, we offer the following comments for your consideration during the project’s Environmental Impact Statement (EIS) process.

The City Council is expected to take legislative action in late May or early June 2019 to forward its comments and recommendations to the Elected Leadership Group and the Sound Transit Board. In anticipation and support of the policy-level action of the City Council, which will include specific recommendations on station options that should move forward, our comments are mainly focused on technical issues that should be studied in the EIS process, representing the concerns and suggestions of City staff, as well as community, commission and Council input. In addition, we are also highlighting some of the City’s core values we believe are essential to shaping the TDLE project in a manner that will maximize its potential for connecting our region. Comments are numbered for easy reference and not listed in any particular order of importance.

#### **A. Core Values**

- 1. Destination City** – Tacoma is the second largest city in the Puget Sound Region. It is recognized as a Metropolitan City in the Puget Sound Regional Council’s Vision 2040 regional growth strategy, which is the top-tier of its regional designations and an area responsible for absorbing a major share of the population and employment growth of the region. The Dome District is within the City’s Downtown Regional Growth Center, which is designated both locally and regionally as a focus for growth and a major destination within the region. For example, the Tacoma Dome is the largest indoor venue in the state of Washington. In 2017, eight of the top 25 North American tours and five of the top 25 worldwide tours played the Dome. The draw of the Tacoma Dome is just one example, but it alone demonstrates Tacoma’s unique status along the TDLE corridor. As a destination for the region, the state and, in fact, world, we would miss the mark if we did not develop the TDLE in a way that supports the visitor or commuter in feeling that they have arrived at a “place”, versus simply passing

through. We would like to work with Sound Transit in consciously exploring, designing and incorporating elements that achieve this sense of destination and place.

- 2. Equity** – The Equity and Empowerment Framework, adopted by the City Council in 2014, makes equity a consistent guiding principle across City services and policies. Equitable service delivery to residents and visitors is a chief goal of the framework. Equity is also one of the core values identified in *Tacoma 2025*, the City’s Ten-Year Citywide Strategic Plan and Vision adopted by the City Council in 2015. The City supports equitable access to transit and improved access to job centers, consumer amenities and public services. We are aware that Sound Transit is also committed to equity in its service delivery – including maximizing transportation affordability and targeting investment in underserved communities to improve access. We are not only committed, but obligated, to use an equity lens in the development of the TDLE to ensure that its benefits are available to and reach a diversity of populations in our community.
- 3. Economic Development** – The City of Tacoma is recognized and expected to serve as a Regional Growth Center for the healthy and sustainable growth of the Puget Sound. In responding to the many challenges and opportunities associated with such growth, the City and the community have consciously made “Economic Vibrancy and Employment” one of our strategic focus areas, as specifically called out in *Tacoma 2025*. We value the light rail extension as a complement and catalyst for economic development. We support Sound Transit’s consideration of economic development as a critical factor and ensuring station locations and the connections between those locations support and promote the economic vitality of our region and City.
- 4. Connections** – The vision of Tacoma’s Transportation Master Plan (TMP), an element of the *One Tacoma* Comprehensive Plan, is a sustainable community with many residents, businesses and visitors who have various transportation needs and priorities. The City is strategic in how it plans its transportation system with an emphasis on carrying the people and goods that foster Tacoma’s culture, character, and competitiveness. The transportation system offers multimodal travel options that provide safe access for all users and neighborhoods, encourage healthy living and protect the environment. The TDLE will, without doubt, become a major connection in this vision and, as such, must be consistent with the TMP and the *One Tacoma Plan*.
- 5. Urban Fabric** – Transit is recognized today as more than transportation. We look to major cities across our nation for examples of how transit has contributed to and is an integral component of communities that are a tight weave of housing, jobs, entertainment, recreation, services and other qualities of life. We envision the TDLE as a major contributor to that fabric in our community, particularly in the Tacoma Dome Station area where transit-oriented development is occurring at an unprecedented pace. We have a vision for the Dome District as a Transit-Oriented Development hub and a growing, regional Entertainment District (*Tacoma 2025, One Tacoma Plan, South Downtown Subarea Plan*). It is important that the Dome District be viewed as a dense, mixed-use urban area with destination entertainment venues and a high potential for housing development rather than solely as a transit corridor/hub. As indicated previously, the City continues to have concerns about the aesthetic, noise, development and economic impacts associated with a fully elevated corridor, particularly as it travels into Tacoma’s Downtown – in this area in particular, these types of significant infrastructure investments must fit within the already well-established urban

fabric as this is not a place that can be redesigned around the infrastructure. In that vein, the “cut-and-cover” and the “over-the-Sounder” alternatives to the elevated stations and alignments as currently presented that were brought up by participants at Sound Transit’s community workshops, by City staff, and by the Mayor, represent design alternatives that could contribute to the urban fabric of our community and are worthy of further examination. If there are other design alternatives that similarly balance the needs for efficient, convenient transit service while supporting dense, transit-oriented development in a developed urban environment, they should also be explored. Sound Transit must underscore the importance of this factor – integration with and strengthening the existing and planned high-density urban environment – to frame the development of the TDLE.

6. **Multi-Jurisdictional Partnership** – “Partnerships” is also one of the core values and guiding principles identified in *Tacoma 2025*. We are committed to the continuous collaboration with Sound Transit and other jurisdictions and agencies involved in and affected by the TDLE project. In particular, the City applauds Sound Transit’s efforts to date and encourages continued close coordination with the Puyallup Tribe of Indians, one of our most significant partners. Additionally, the City of Tacoma, the Port of Tacoma, and the Puyallup Tribe have entered into a multi-jurisdictional partnership, along with the City of Fife and Pierce County, to develop a subarea plan for the Tideflats area. This plan will refine the land use and transportation assumptions for the areas surrounding the Tacoma Dome, East Tacoma and Fife Stations. We encourage Sound Transit to work closely with the City to account for this planning effort in the development of the TDLE project.

## **B. Technical Issues**

Through the upcoming environmental review and project design phase, the following specific issues deserve in-depth analysis and special consideration:

### **1. Safety**

- a. Transportation safety should be included as an evaluation criterion for all alternatives. The impact of any at-grade crossings, in particular, should be considered. The draft EIS should also describe the improvements which will be made to the roadway network to enhance safety.
- b. Analyze the potential for this infrastructure facility to create new opportunities for blight and undesirable or criminal activities, and potential Crime Prevention Through Environmental Design (CPTED) options and/or other mitigations that could reduce this potential.

### **2. Equitable Access**

- a. Analyze the impacts on equitable access to job centers, consumer amenities and public services.
- b. Access to and from the new stations must be convenient and safe for all residents, employees and visitors. Both of Tacoma’s station locations will require significant analysis and consideration for access, including the proposed East Tacoma Station as it is separated from many of the surrounding destinations by existing infrastructure barriers (Interstate 5, Sounder corridor, etc.)

### 3. Development Potential

- a. The process must include evaluation of factors relative to how this transit investment can be developed in a manner that is most supportive of economic development, and particularly transit-oriented development, to include maximizing future development potential, avoiding the creation of remnant parcels, and avoiding impacts which may reduce practical or permissible future development due to building offsets, maintenance and constructability concerns, fire and life safety, or related issues.
- b. Analyze route, station locations, and design alternatives to identify options that maximize the potential for dense urban, mixed-use and entertainment developments and minimize the loss of property otherwise available for development, particularly in the Dome District.
- c. Ensure that the station design is integrated into a land use and transportation environment which is significantly denser than the current environment, particularly in the East Tacoma Station area.
- d. The environmental review process must include an examination of consistency with regional transportation and land use plans and the City's adopted policies and plans, including the *One Tacoma* Comprehensive Plan and some of its elements that are most relevant to the projects, such as the Transportation Master Plan and the South Downtown Subarea Plan.

### 4. Visual, Noise and Urban Design Impacts

- a. Analyze potential visual and urban design impacts, including impacts associated with shading, effects on trees and vegetation, the use and quality of urban public space, obstructing views (especially water views) from planned and future development, the potential for obscured store-fronts and increased signage costs, more difficult access, the potential to physically and psychologically "divide" these neighborhoods, and the potential to limit roadway operations and streetscape design flexibility over time.
- b. Analyze the possible noise and air pollution and evaluate design options and/or mitigations to eliminate or reduce such impacts.

### 5. Archaeological and Cultural Elements

- a. This corridor passes through areas in close proximity to known culturally significant areas, archaeological sites and designated historic structures, as well as areas that are considered to have a high probability of containing archaeological sites. The environmental review should include an in depth analysis of known elements, potential discoveries and impacts.

### 6. Street Networks

- a. For the East Tacoma Station, the community noted significant opportunity to reconfigure the existing City street network to enhance the safety and efficiency of access to the project. The City anticipates that some of these reconfigurations may be necessary to adequately provide access to the East Tacoma Station, and that some preliminary design may be required to adequately evaluate the strategies for providing traffic circulation to and from the station.
- b. In the East Tacoma Station area, analyze the impacts to traffic flow on the Portland Avenue corridor, including the impact on freight transportation.

- c. The Transportation Master Plan designates Portland Avenue as a corridor which is important to many modes of transportation, including high-capacity transit and bicycling. Please ensure that the environmental analysis addresses how the alternatives will support the goals in the City's *One Tacoma* Comprehensive Planning documents. The analysis should address how the designs will integrate with the planned modal priorities along Portland Avenue, including how the proposed station will facilitate connections to future high-capacity transit service and how the station location and design will facilitate connections to the surrounding community via active modes of transportation.
- d. The community workshops identified a need to make enhancements in the vicinity of the East Tacoma Station to address the current lack of active transportation facilities. A representative example is the need to improve connections from the proposed station locations to the community which will be most served by the new station, which is on the opposite side of Interstate 5, and the idea that a new pedestrian bridge from the station area to the casino area could address some of this need. The environmental analysis should discuss how the station will integrate with active transportation facilities on Puyallup Avenue, Bay Street, Portland Avenue, L Street, and a potential new bridge over Interstate 5.
- e. We encourage Sound Transit to adopt a design timeline which accounts for the active participation in the upcoming planning exercises associated with the Tideflats Subarea Plan to re-configure the transportation network and re-imagine land uses around the East Tacoma Station. There may also be significant opportunities for partnership between the City, Port of Tacoma, Sound Transit, Puyallup Tribe and others to work together to re-envision this particular area so that it best capitalizes on this significant investment while meeting the needs of so many different stakeholders.

## **7. Multimodal Connections**

- a. Evaluation of the alternatives, and the location and design of the stations, should place paramount importance on the connections to other modes. Stations should explicitly accommodate, at a minimum, the following transportation choices: transportation network companies, taxis, charter buses, and other for hire vehicles; pedestrians; bicyclists; dockless bike and scooter share; vanpool and carshare; private shuttles; and local and regional bus transit.
- b. Evaluate traffic circulation to and from the station, including both the surface network serving the station and the loading and parking areas at the station. Management of each trip type—parking, bus, shuttle, taxi, transportation network company, and private curbside service, for instance—should be included in the analysis, including the expected strategies for storing and segregating those trips within the station area. The evaluation should also discuss how the station design will accommodate future flexibility in design to accommodate shifting demand for different modes.
- c. Evaluate the potential impacts of the new station and improvements on the planned modal priorities in the Transportation Master Plan, which shows the key networks for each mode.
- d. The transportation and access evaluation will need to account for large events because of the significant, regional entertainment venues located in these stations areas, including the Tacoma Dome and the new Puyallup Tribal Casino.

## 8. Pedestrian and Bicycle Connections

- a. The analysis should include the degree to which pedestrian access to the new service, and the pedestrian cross-connections to existing services such as Sounder and Tacoma LINK, are separated from other modes. The safety of each connection should be assessed in the environmental documents. For the Tacoma Dome Station, the analysis should consider the extent to which off-street connections can be made directly to other modes of transportation around the area. Safe connections which do not rely solely on the existing connections within the right-of-way will reduce interactions with at-grade rail crossings, intersections, and other potential conflicts.
- b. The City's *One Tacoma* Comprehensive Plan establishes a modal hierarchy which places pedestrians at the highest priority. Pedestrians are assumed to be a priority on every street. The City also views strong pedestrian access as essential to the long-term success of the TDLE. The ease and convenience of active transportation connections should be included as part of the environmental analysis, including whether or not the pedestrian routes are protected from the elements, grade changes, walkway and bikeway widths, bicycle accommodations at stations, running slopes, and the directness and distance of routes.
- c. During the community workshops, several stakeholders mentioned the concept of modifying station locations so that pedestrian access points can be provided on opposite sides of busy streets. This concept would reduce the number of at-grade pedestrian crossings, and should be a design alternative evaluated in the environmental analysis.
- d. Analyze the station locations for best pedestrian connections to job centers and consumer amenities such as shops and entertainment venues, as well as most convenient linkages between transit for tourists and travelers.
- e. Necessary positive outcomes of any transit project must include enhanced personal safety, strong pedestrian and bicycle connections to the rest of downtown and urban amenities such as on street parking in front of shops, walkability and placemaking.

## 9. Parking

- a. Consider parking impacts along the entire transit system (Tacoma LINK, Pierce Transit). The current concept for the East Tacoma Station does not include any associated parking. While the Tacoma Dome Station has the potential to have some of the best multimodal connections in the region, the East Tacoma Station area is not expected to have the same opportunities. The environmental analysis should discuss how people will travel to and from the East Tacoma Station. If parking is provided, the analysis should discuss how the parking will be managed (e.g., by using congestion pricing and/or providing competitive pricing for vanpools) to help maximize ridership and help the City achieve its mobility, safety, and mode split goals.

## 10. Construction and Operation Impacts

- a. The impacts of the operation and construction of the alternatives should be included, including impacts to existing businesses and impacts to existing transportation; particularly transit services operating at Tacoma Dome Station.

- b. Construction of this system will necessitate modifications to existing utility, transportation and other infrastructure. These impacts need to be fully assessed during the environmental review process to ensure the project can be implemented in a way that ensures the continued operation and integration of these other critical facilities.

#### **11. Future Extension**

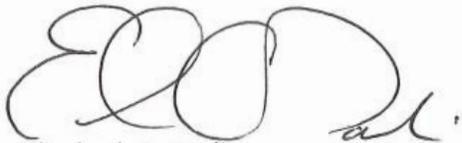
- a. The City's Transportation Master Plan envisions the future extension of Central LINK to the Tacoma Mall Area. This future extension is also incorporated into Sound Transit's long-range plan, and funding for study of this extension was included in the ST3 package. The draft EIS should address the future feasibility of this extension, at least as it relates to station location and design alternatives.

#### **12. Project Delivery**

- a. Recognizing the increasing transportation demand of the region, we encourage Sound Transit to explore alternatives which would allow advanced delivery of the project. The evaluation should assess how different alternatives may encourage or discourage the timely completion of the project, including impacts to the feasibility of funding, permitting, or constructability.

Thank you for the opportunity to comment. The City of Tacoma looks forward to our continued partnership on this very exciting project. We believe these types of high-capacity connections are absolutely key to providing the full menu of transportation alternatives necessary to meeting the needs of the region and our growing population in a more sustainable and resilient way. We are committed to continuing to work closely with Sound Transit through the environmental review and project design process to ensure the successful and timely delivery of the TDLE project.

Sincerely,

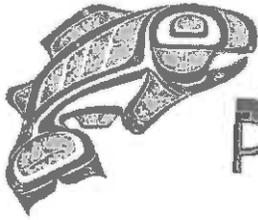


Elizabeth A. Pauli

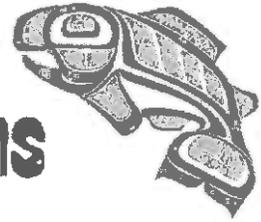
City Manager

- c: Mayor Victoria Woodards and Members of the Tacoma City Council  
Jackie Flowers, Director, Tacoma Public Utilities  
Peter Huffman, Director, Tacoma Planning & Development Services Department  
Kurtis D. Kingsolver, P.E., Director, Tacoma Public Works Department  
Jeff Robinson, Director, Tacoma Community & Economic Development Department  
Brian Boudet, Planning Division Manager, Planning & Development Services Department  
Alisa O'Hanlon, Tacoma Government Relations Office





# Puyallup Tribe of Indians



May 1<sup>st</sup>, 2019

Honorable John Marchione  
Sound Transit Board Chair  
401 South Jackson Street  
Seattle, WA 98104

Dear Chair Marchione,

The Puyallup Tribe of Indians would like to offer its esteemed gratitude to Mayor Woodards, Executive Dammeier, and Sound Transit CEO Rogoff for participating in our recent government to government consultation last February over the Tacoma Dome Link Extension Project. We recognize the importance of continuing to engage in meaningful dialogue to ensure the project addresses concerns of the Puyallup Tribe and that project delivery meets expectations.

Our comments submitted today are for the Scoping Period Analysis and characterize the Tribe's positions on several of the station locations, crossings, and alignment configurations filtered out of the Level 2 Analysis. The Tribe will continue to work with you and your staff to identify a preferred alignment that works congruous with our developments on the Puyallup Reservation.

## South Federal Way Station Alignment

There are two primary alignments toward the City of Fife from the South Federal Way Station. One alignment along I-5 and the other along SR 99. We believe an SR 99 alignment would pose a multitude of tribal trust property impacts to our members. We believe that there are fewer impacts to tribal property along I-5 and thus prefer this alternative. While there are potential cultural resource impacts along this corridor near the St. George property, we believe these impacts can be properly addressed by working with our Historic Preservation Department. By working together, we believe these impacts can be minimized or outright avoided. It is the Tribe's understanding that both alignments are likely to be studied as part of the EIS and welcome the opportunity to provide input and data in identifying challenges with both alignments.

Additionally, the Tribe looks forward to studying the interchange between the SR 167 project and the Tacoma Dome Link Extension where both projects bifurcate Hylebos Creek. It is vital this area is properly studied since all prospective alignments thread in the same location. It is important for Sound Transit and WSDOT to work collaboratively with the Tribe to ensure that efforts to enhance the Hylebos are not conflicted by the two projects.

### **Fife Station & Alignment**

The City of Fife and the Tribe have been actively collaborating on a station location. The Tribe supports Fife-3A and Fife 3-B in order to capture potential riders going to and from existing Tribal enterprises in this area and to recognize the City of Fife's plans to catalyze the area as part of their City Center Plan. We believe Fife-4 may impose traffic circulation issues along SR 99 and Fife-1 is too far away to maximize ridership of existing and potential development in the area.

Regarding alignment out of the station locations, the Tribe supports the continued study of alignments along the south side of SR 99 and along the North I-5 right of way. We are opposed to a north SR 99 alignment between 46<sup>th</sup> Ave E to Alexander Ave as this path would significantly impact Tribal facilities, businesses, residences, and trust lands. Additionally, we recognize both a SR 99 and I-5 alignment will impact the Puyallup Tribe Integrative Medicine Building property and Sound Transit will likely need an easement from the Tribe.

### **Puyallup River Crossing**

Tribal Council is pleased that Sound Transit is exploring multiple options to span the Puyallup River, including the option of a clear span. The Puyallup River is a significant historical, cultural, and economic resource to the Puyallup Tribe. If an in-river piling option were to be pursued, strong mitigation measures to prevent impacts to the Tribal Fishery must be explored and part of the EIS process. We look forward to studying the differences between the impacts associated with the varying options of spanning the river. Additionally, we are pleased that the pre-scoping process has eliminated alignments that would impact the Tribe's Ceremonial Grounds on the western bank of the river.

### **East Tacoma Station & Alignment**

Regarding the East Tacoma Station locations, the Tribe is supportive of ET-3 and ET-4 as preferred alternatives, with ET-6 being an important alternative to study in the EIS. ET-1 and ET-2 are not supportive of ridership and connectivity to East Tacoma. ET-5 would have individual member trust land impacts. In any station design the Tribe is concerned with traffic circulation in and out of this station. Consideration of existing road conditions and street realignment should be an essential part of this station's study to maximize ridership and reduce congestion on Portland Avenue.

Additionally, we are interested in future consideration for Sound Transit parking facilities for the station in this area. The Tribe will have to carefully evaluate usage of the Tribe's parking facilities in conjunction with these stations so that system demand is not impacting Tribal enterprises.

**Tacoma Dome Station**

In this station area the Tribe prefers alternatives TD-2 and TD-3 for continued study. We believe these stations are the strongest suited for supporting ridership and connecting riders to other transit connections.

In our review of the remaining stations, TD-4 East Off-Street is the most impactful to our off-reservation trust lands and this station should be removed from further study. We also find TD-4 East In-Street to be undesirable in its current location. However, we believe the station warrants further study in a nearby location that doesn't directly impact the frontage of the Tribe's property. TD-4 West & TD-1 we believe are poor location choices due to congestion impacts on East D Street and connecting other transit options.

Finally, there has been some recent discussion of the possibility of undergrounding a station within the Tacoma Dome station location area. The Puyallup Tribe is deeply concerned with tunneling in the Tacoma Dome station because of the high probability of cultural and human remains in the area. As the high ground near the original mouth of the Puyallup River, the Tribe knows this area to be a large traditional village site. In 2015, as part of the Tacoma Trestle Project, Sound Transit unearthed a cultural finding within this area. We continue to work with Sound Transit in mitigating the impacts of cultural and historic resources of the Tacoma Trestle project to this day. An above ground station will have challenges mitigating for cultural and historic resources. An underground station would expose the project to potential catastrophic risks that could end up being immitigable and prevent the completion of the project. If this proposal continues forward in the EIS, the Tribe will actively work with Sound Transit's Cultural Resource Consultant to properly characterize the impact of a below grade station.

We thank Sound Transit for this opportunity to provide comment for the Scoping Period Analysis. The Puyallup Tribe is excited at the opportunities regional light rail will provide to our membership. We look forward to continuing to work with you and your staff on making sure this project is successful.

Sincerely,



**Bill Sterud, Chairman  
Puyallup Tribal Council**

