ALLENTOWN TRUCK REROUTE PROJECT



STATE ENVIRONMENTAL POLICY ACT

ENVIRONMENTAL IMPACT STATEMENT

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City Of Tukwila

FIS Environmental Impact Statement
project Allentown Truck Reroute Project
SEPA State Environmental Policy Act

1.0 Introduction

1.1 How to Use this Report

The City of Tukwila (City) is the lead agency overseeing the preparation of an Environmental Impact Statement (EIS) under the State Environmental Policy Act (SEPA) for the proposed Allentown Truck Reroute Project. An EIS provides an impartial discussion of probable adverse environmental impacts, reasonable alternatives, and mitigation measures that would avoid or minimize adverse impacts.

The purpose of scoping is to identify the issues and potential alternatives to be analyzed in the EIS. The purpose of this scoping report is to summarize comments the City received from individuals, tribal governments, organizations, and agencies during the Scoping Period for the Allentown Truck Reroute Project EIS. This report distills all received comments into equally considered issues of concern.

The City will use all comments from the Scoping Period to help determine the issues and extent of the analysis to be included in the EIS, as well as options for reasonable routing alternatives and mitigation measures that could be considered. The City will review comments as it develops the Draft EIS.

All comments received in the Scoping Period are available in their original form, as well as in table format, in Appendix A.

1.2 Purpose of Project

The purpose and need for this project is to develop an alternative route to the BNSF Intermodal Facility in Allentown to improve livability and safety in Allentown without compromising the operations of the intermodal facility.

1.3 Purpose of Scoping Period

The first step in the development of an EIS is called "scoping." During the Scoping Period, agencies, tribal governments, local communities, organizations, and the public are invited to provide issues of concern they feel should be analyzed and considered in the EIS by submitting public comments. Specifically, the Scoping Period is intended to collect input on the following topics:

- 1. Ideas and opinions on alternative truck routes
- 2. Potentially impacted resources and extent of analysis for those resources
- 3. Potential measures to avoid, minimize, or mitigate impacts of the proposed project

2.0 Scoping Period

2.1 Structure

In response to community feedback from previous engagement efforts, the City proposed and pursued a two-phase Scoping Period, as shown in the graphic below.

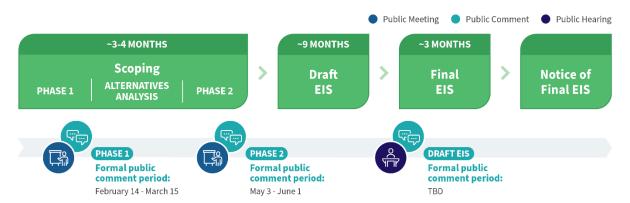


Figure 1: Allentown EIS Process Graphic

Phase 1 had a formal public comment period of 30 days. From February 14 through March 15, 2023, the City collected comments on potential truck route alternatives, community resources, and environmental impact potential.

- The City published multiple notifications of Phase 1 before and during the formal public comment period. These notifications are expanded upon in Section 2.2 and available in full in Appendix B.
- The City hosted an in-person community meeting on February 28, 2023, at the Tukwila Community Center from 5:30pm to 7pm PST. The community meeting was scheduled in partnership with the Allentown Advocates, a neighborhood engagement group, to align with their regularly scheduled meetings for maximum participation.
- The community meeting consisted of a presentation from project staff, informational display boards, small discussions facilitated by project staff, and opportunities for community members to ask questions and engage with the project team. Factsheets and paper comment forms were available for participants, and facilitators emphasized the SEPA requirement for all comments to be written and submitted. All community meeting materials are available in Appendix C.
- After the community meeting, per the request of attendees, additional paper comment forms were made available, and a poster describing the purpose of scoping, the comment period, and how to comment on the project was hung at the Tukwila Community Center. The poster is available in Appendix C.

Between Phase 1 and Phase 2, the City and their consultants conducted an Alternatives Analysis. Project staff read all received Phase 1 comments and developed five proposed alternative truck routes based on feasibility, previous studies, and community feedback. Once the proposed alternative truck routes were

finalized, project staff began creating public-friendly maps and informational materials in preparation for Phase 2.

Phase 2 also had a formal public comment period of 30 days. From May 3 through June 1, 2023, the City collected feedback on five proposed routing alternatives and additional topics to be studied in the EIS.

- Similar to Phase 1, the City published multiple notifications of Phase 2 before and during the formal public comment period. These notifications are expanded upon in Section 2.2 and available in full in Appendix B.
- The City hosted another in-person community meeting on May 23, 2023, at the Tukwila Community Center from 5:30pm to 7pm PST. Again, the community meeting was scheduled in partnership with the Allentown Advocates, a neighborhood engagement group, to align with their regularly scheduled meetings for maximum participation.
- The community meeting consisted of a presentation from project staff that briefly explained each alternative, display boards of route maps, small discussions facilitated by project staff, and opportunities for community members to ask questions and engage with the project team.
 Factsheets and paper comment forms were available for participants, and facilitators emphasized the SEPA requirement for all comments to be written and submitted. All community meeting materials are available in Appendix C.
- Based on feedback from Phase 1, the project team made factsheets and paper comment forms available and hung a project poster with details about the Phase 2 community meeting at the Tukwila Community Center when the formal public comment period began. After the community meeting was completed, the poster was replaced with a similar project poster without community meeting logistics to avoid confusion.

2.2 Public Notifications of Scoping

The City notified interested parties, state and local agencies, local tribal governments, and the public of the scoping comment period and ways to provide formal comments using a variety of communication tools. Notifications are provided in Appendix A and included:

Phase 1

Formal Public Comment Period – February 14 through March 15, 2023

- Mailed postcard
- Seattle Times Legal Notice (February 14)
- The Hazelnut:
 - Online version January 2023 and February 2023
 - Print version January/February 2023 Volume 43, Number 1
- Allentown Mailing List Newsletter (February 15 and March 21)
- Social Media schedule and boosting details available in Appendix B:
 - Facebook event (February 17)
 - Twitter post (February 22)
 - Facebook post (March 9)
 - Twitter post (March 10)

- Tukwila Community Center Poster:
 - Available to view from February 29 through March 15
- Project Website:
 - Updated Project Status, EIS Process, Frequently Asked Questions, and Document Library and Helpful Links sections
 - Added Phase 1 online comment form

Phase 2

Formal Public Comment Period – May 3 through June 1, 2023

- Mailed postcard
- Seattle Times Legal Notice (May 3)
- The Hazelnut:
 - Online version April 2023
 - Print version N/A (publishing schedule did not align with Scoping Period and community meeting dates)
- Allentown Mailing List Newsletter (May 3 and June 23)
- Social Media schedule and boosting details available in Appendix B:
 - Facebook event (May 5)
 - Twitter post (May 11)
 - Twitter post (May 24)
 - Facebook post (May 26)
- Tukwila Community Center Poster:
 - Event notification version available to view from May 3 to May 23
 - Non-event notification version available to view from May 24 to June 1
- Project Website:
 - Updated Project Status, EIS Process, Frequently Asked Questions, and Document Library and Helpful Links sections
 - Added Routing Alternatives map section
 - Added Phase 2 online comment form

2.3 Opportunities to Provide Comment

During the Scoping Period, the public was invited to submit comments during two separate comment phases in the ways detailed below:

- Online comment forms, one per phase, were posted and available on the project website.
- Paper comment forms, one per phase, were available to complete at the in-person comment meetings, as well as at the Tukwila Community Center.
- Email comments were collected at AllentownTruckReRoute@TukwilaWA.gov.
- Direct mail comments were required to be postmarked by the final day of the formal public comment period for each phase (i.e., March 15 and June 1). Comments were to be sent to the following address:

Mark Hafs

6300 Southcenter Blvd., Suite 200 Tukwila, WA 98188

2.4 Comments Received

The City invited comments through a variety of methods. Table 1 and Table 2 provide counts for the number of comments received during Phase 1 and Phase 2, respectively, as well as the methods by which comments were submitted. All comments received are available in Appendix A.

Table 1: Tally of Phase 1 Comments Received during Scoping

Source	Number
Emails and direct mail	13
Paper comment forms	9
Online comment forms	34
Total	56

Table 2: Tally of Phase 2 Comments Received during Scoping

Source	Number
Emails and direct mail	7
Paper comment forms	8
Online comment forms	35
Total	50

2.5 Comment Analysis Process

The Phase 1, 30-day, formal public comment period began on February 14 and closed on March 15. During this time, a total of 56 Phase 1 comments were received through the various methods described in Table 1.

The Phase 2, 30-day, formal public comment period began on May 3 and closed on June 1. During this time, a total of 50 Phase 2 comments were received through the various methods described in Table 2.

All submissions were reviewed and analyzed during the preparation of this report. Phase 1 and Phase 2 comments, both in their original form and as a table, are available in Appendix A.

2.5.1 Processing Communications

The full text of all comment submissions was entered into a single database for analysis. Analysts recorded the name and contact information (if provided) of each commenter, the source of the submission (e.g., email, mail), and the date received. Once the commenters' names and submissions were entered into the database, analysts read each submission to identify and code unique comments. Many submissions contained multiple comments. Comments were defined as unique concepts or ideas within a submission. Each unique comment was assigned one or more issues of concern.

Each unique submission was reviewed at least twice—once by the primary coding analyst, and again by a second analyst for quality assurance and control and/or during the preparation of this scoping summary. This process allowed for resolution of discrepancies or inconsistencies.

2.5.2 Analysis Methodology

To create this report, analysts queried the database to generate lists of comments organized by issues of concern. Comments within each issue of concern were then summarized to capture the unique issues and concerns expressed by commenters.

For the purpose of this summary, every comment has value, whether it is stated only once or multiple times. Scoping is designed to help identify issues that should be addressed and analyzed in the EIS and is not intended to function as a "voting" process.

Table 3 details how Phase 1 comments were organized by issues of concern. The City did not provide proposed alternatives during this phase; rather, comments cite areas that should be studied in the EIS.

Table 4 notes positive and negative sentiments regarding the City's proposed route alternatives from Phase 2 comments as accurately as the comment analysis team could infer. For reference, Figure 2 is a map of all five proposed alternatives. Additional maps are available in Appendix C.

Table 3: Phase 1 Comments Sorted by Issue of Concern

Issue of Concern	Number of Comments
Air Quality/Greenhouse Gases	13
Alternatives	30
Cultural Sites/Resources	1
Health and Safety	19
N/A (unrelated to the project)	4
Noise	11
Plants and Animals	16
Public Services/Utilities	3
Social Elements	4
Traffic	6

Table 4: Phase 2 Comments Sorted by Positive and Negative Responses to Proposed Alternatives

Alternative	Positive Responses	Negative Responses
Alternative 1	16	3
Alternative 2	27	1
Alternative 3	4	6
Alternative 4	0	10
Alternative 5	1	9

Note: Positive/negative responses were counted if explicitly written in comment submissions. Some comments cited multiple positive/negative responses for various alternatives.

9

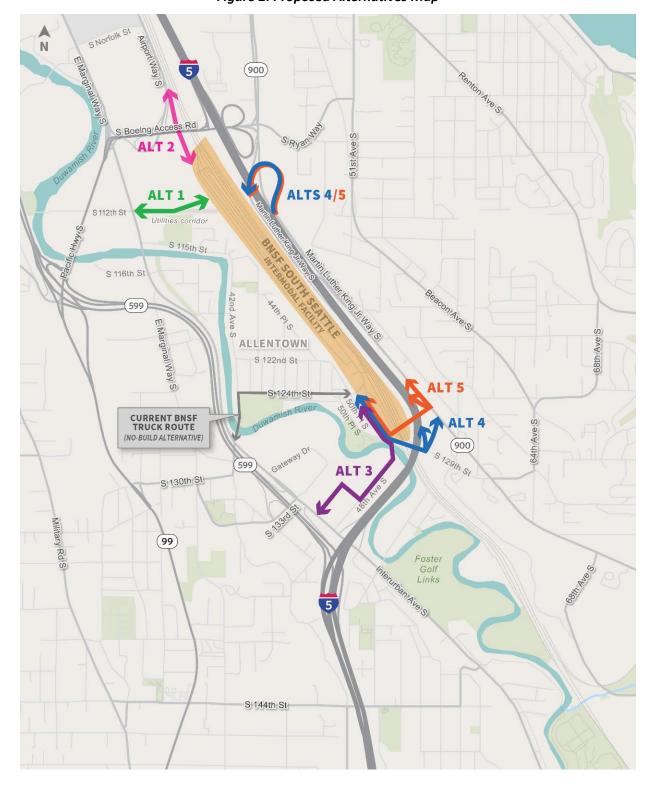


Figure 2: Proposed Alternatives Map

3.0 Public Comments Summarized by Issues of Concern

3.1 Air Quality/Greenhouse Gases

In both phases, commenters cited air quality as a serious concern due to the amount of exhaust and high levels of CO₂ produced by trucks.

Commenters noted that the current route and any alternate routes that do not completely avoid the Allentown neighborhood could negatively impact air quality.

Many commenters noted concerns that children in the neighborhood have been and may continue to be exposed to poor air quality due to neighborhood truck routes.

3.2 Alternatives

3.2.1 Phase 1

Commenters noted several preferences for proposed route alternatives, including:

- Avoid neighborhood areas to improve traffic, pedestrian/family safety, and air quality.
- Avoid routes near/along the river to improve environmental impacts.
- North or south entrances are preferred, especially via the following streets:
 - Airport Way
 - o 112 Street
 - o 48th Avenue
 - o Airport Access Road
 - Seattle City Light transmission corridor
 - o 64th Avenue to S 129th Street to 50th Place S
 - o S 124th Street
- Use underdeveloped/old roads currently for trucks.
- Support for a proposed truck route with direct access to I-5.
- Develop a route for trucks that separates them from private vehicles and school buses.

The Duwamish Tribe provided comment which favors an alternative that, "is farthest from a known archaeological site, that does not adversely impact the environment of the Duwamish River and does not cross near our current sacred sites which include, but not limited to, the Duwamish Hill Preserve, Chinook Winds and North Winds Weir."

3.2.2 Phase 2

Commenters provided the following feedback on the five proposed route alternatives:

- Alternatives 1 and 2 most effectively remove trucks from Allentown.
- Alternative 2 is the most affordable and least impactful to residents.

- Alternatives 3, 4, and 5 would not completely remove trucks from Allentown.
- Alternatives 3, 4, and 5 are too complicated.
- Alternatives 4 and 5 would be too expensive because they require new infrastructure.
- Alternatives 4 and 5 would negatively affect houses on 51st Avenue.

Commenters also expressed concerns that BNSF Railway would refuse to consider Alternatives 1 and 2 because they require restructuring the facility.

Tenants of the Empire View Mobile Homes expressed concern with trucks using S 129th St. The street is on a hill and swerving could endanger property and residents. Commenters were especially concerned with truck drivers on the hill during heavy rain, snow, and icy conditions.

BNSF Railway provided a comment that expressed their preference for Alternative 3. Their comment also stated that Alternatives 1 and 2 are not feasible due to the required restructuring of the yard and requested additional information on Alternatives 4 and 5.

3.3 Cultural Sites/Resources

Phase 1 and 2 commenters expressed concern that the current route, and potential route alternatives, could negatively affect resources like the Duwamish Hill Preserve, the Duwamish River, wetlands, trails, and the Chinook Winds mitigation project.

One commenter specified that the Allentown community has actively worked to support the Duwamish Hill Preserve.

A comment from the Duwamish Tribe expressed the following:

- "...an archaeological survey is highly advised with a very high risk of encountering cultural resources."
- "We would also request that any bore logs and/or a geotechnical report associated with the
 project is made available to us to help narrow down future comments. This is in an area the
 Duwamish Tribe considers culturally significant and has a high probability to have unknown
 archaeological deposits, especially if excavation cuts below fill."

3.4 Health and Safety

Comments from both scoping phases expressed concerns related to the health and safety of residents. Multiple comments specifically cited 6PPD (N-(1,3-dimethylbutyl)-N'-phenyl-p-phenylenediamine) chemicals from truck tires and PAH (polycyclic aromatic hydrocarbon) chemicals as a threat to neighborhood health.

Commenters shared personal experiences of poor breathing and headaches due to constant truck fumes in the neighborhood.

Tenants of the Empire View Mobile Homes and other commenters noted safety concerns for neighborhood children, elderly, and other pedestrians due to the consistent presence of large trucks.

3.5 Noise

Commenters noted rumbling, reverse beeps, and general truck noise as an issue with the current truck route and potential routes that pass through the neighborhood.

Comments expressed difficulty sleeping as a direct consequence of truck noise.

3.6 Plants and Animals

Comments expressed concerns related to the wildlife in the area, specifically Coho Salmon and other fish, birds, seals, otters, beavers, ducks, geese, rabbits, eagles, and raccoons.

Comments noted the possible upheaval of trees for possible route alternatives as having a negative effect on the environment.

A comment from the Duwamish Tribe expressed, "While our focus is on preserving our cultural resources, we also support and recommend the removal of invasive species and noxious weeds and replace any proposed landscaping with only native vegetation to increase habitat for native fish, wildlife, avian life and pollinators."

3.7 Public Services/Utilities

Multiple comments noted poor road conditions and excessive wear and tear to infrastructure due to consistent truck driving on residential roads.

3.8 Social Elements

Several commenters mentioned that cost played a large role in decision-making. Comments noted that the potential cost of proposed alternative routes requiring new infrastructure, like an additional bridge, was a negative factor.

Commenters emphasized the diversity of the neighborhood and stated that thorough engagement is needed to communicate with everyone effected by the current, and potentially new, truck route.

3.9 Traffic

Comments expressed frustration with the current use of roads by large trucks, which block traffic in the neighborhood due to size and possible breakdowns.

In Phase 2, commenters expressed concern that some alternatives may be confusing for truck and residential drivers alike, which could create more traffic.

A commenter suggested a thorough analysis of traffic impacts. Comment noted that travel time and reliability are important criteria for truck freight performance.



APPENDIX A

RECEIVED COMMENTS

Personal information such as names, email addresses, and phone numbers have been omitted for privacy reasons

PHASE 1

February 14, 2023 - March 15, 2023

Number	Submission Date	Submission Type	Scoping Comment (Alternative Suggestions and EIS Issues of Concern)	EIS Process Feedback (Opt.)	Neighborhood (Opt.)	PDF Available
1	1/31/2023	Email	I understand that Mark Hass will be handling the EIS study. It is very important that Baker Commodities is included when evaluating where bridge would be placed. Potential bridge placement on 48th Ave S is our biggest concern on how it would affect or accommodate our equipment coming in and out of our plant 24 hours a day.			Yes
2	2/15/2023	Online	Pedestrian safety and traffic problems in our neighborhoods indicate to me that the Airport Way South or South 112 Street alternatives should be chosen. Allentown is a residential neighborhood which should receive an investment in infrastructure to cut back on the impacts from the freight transfer yard. Further, my neighborhood (West Hill) has been severely impacted from freight truck traffic to/from M.L. King Jr. Way South along S 129 Street. Road and sidewalk / walkway damage resulting from trucks driving over surfaces not designed for the weights. And safety risks (steep hill and limited sight distances among others) would not allow truck traffic on this scale would it be built today. There have been accidents / injuries on S 129 Street involving trucks. Large Trucks should not be allowed on South 129 Street west of M.L. King Jr. Way South. Air / noise pollution from these trucks only add to the same from Interstate 5. These neighborhoods are long overdue for some respect from BNSF and our local/state/federal representatives.		West Hill	
3	2/16/2023	Online	I am only one person sending this comment in for all of us residents at 5711 S. 129th St., Seattle, WA 98178Empire View Mobile Home Park. We attended Councilman Girmay Zahilay's September Zoom Town Hall meeting and expressed the same concerns as several others. The truck noise and vibrations have disturbed us day and night. This is especially annoying at night when we are sleeping, and have had our sleep disrupted, continuously, even when we use earplugs. This really is a health issue from that standpoint as well as from the pollution spewed into the air. In addition, the trucks have torn up the road, making driving up and down 129th St. like driving on a washboard, very rutted and damaged. We expressed these concerns before, as well as to BNSF. It almost seems like this will continue unless someone in authority, such as your Tukwila group, or another entity, is able to make them	We wonder how soon the Re-Routing can be accomplished, and what alternatives there might be for the trucks in the interim period. We also wonder what "clout" your group has along with other	Unincorporated King County just across the I-5 overpass from Allentown	

			change their ways. For a period of time, the truck noise seemed to have subsided, but that was not permanent. The trucks have still been roaring by on 129th St. Thank you very much for your concern on behalf of us here at 5711 S. 129th St.	government entities who represent us. We realize BNSF is about money, but there should be reasonable consideration for the community's health and well- being.		
4	2/18/2023	Online	There is a chemical in tires that is suppose to make them wear less and more rubbery. These huge particles from truck tires get left behind. These chemicals are extremely toxic to salmon. I expect the EIS to research for potential impacts. (there are 18 huge tires on trucks)		Allentown	
5	2/18/2023	Online	Allentown bridge should be open for both lanes north and south to private vehicles and school bus only. BNSF should open another route specific only for trucks such as the railroad ave to Interurban.		Allentown	
6	2/19/2023	Online	Semi truck weight is too much on 42nd Ave S. I live on this road, & do not want the road, collapsing due to that extra, heavy weight. Also, the extra noise & exhaust, from those semi trucks."		Allentown/ Duwamish	
7	2/20/2023	Online	Truck traffic should be directed into the yard from the north end where there are commercial businesses and direct access to Interstate 5. There is an old road on the west side of the BNSF property that use to be utilized for this purpose. It lacks basic common sense to go through the residential neighborhood on the south end of the BNSF rail yard.		Allentown	
8	2/21/2023	Online	Truck traffic should not ever be routed through neighborhoods directly in front of Community Centers or schools. Duh. Safety, pollution, runoff, etc truck traffic should be routed from north end of transfer facility since a bridge south to 48th Ave South freeway exits is not a city priority.			
9	2/21/2023	Online	Over 43% of people living in Allentown were born in another country. These people have been taken advantage of because their voices are not heard.		Allentown	

10	2/21/2023	Online	Please be aware that at various times during the day, traffic, including intermodal truck traffic, backs up on Southeast bound 129th Street as it approaches Martin Luther King Jr Way South. These traffic back ups affect the ability of residents at Empire View Mobile Home Park at 5711 S. 129th St. and Vue Mobile Home Park at 12929 Martin Luther King Jr Way South to enter and leave their homes. This may be a matter of adjusting traffic light timing. I am the property manager of both of these properties.		Skyway	
11	2/21/2023	Online	Please explore how the trucks are polluting the Duwamish River, a critical salmon habitat. Explore how the trucks impact the banks of the Duwamish River. Explore how the trucks impact restoration sites along the Duwamish River. Explore how PAH chemicals come off of truck tires. Explore the impact of large trucks on nearby children and pedestrians. Explore the impact of noise pollution in a local population. Explore the impact of having large trucks surround a community center which basically cuts the community center off from the neighborhood. Explore the undue buden put on marginalized communities by having large trucks in their neighborhood. Please find a re-route that takes the trucks out of Allentown.	What is the expected time frame?	Riverton	
12	2/22/2023	Online	Explore PaH chemicals going into the river, a critical salmon habitat. Truck traffic hinders walking in the neighborhood, which disproportionately impacts minorities. Please look into that. Large trucks circling the community center make it unsafe. Please look into that.			
13	2/22/2023	Online	Over the 40 years the neighborhood has been trying to reroute the truck traffic that travels through a residential neighborhood and 50 feet from a community center there have been multiple studies. The last one in 2015 stated that 48th Ave S was the best alternative. This road has truck related businesses such as a motel with semi truck spaces for parking, a truck parts store, diesel fueling, Penske truck rentals, and a drilling equipment supplier to name a few. The City gave many contradicting explanations why they didn't move forward because they told the community at the time that they were going to move forward. One of the explanations was that the 42nd Ave street bridge was deemed extremely unsafe and the city focus was turned to that. Nothing was done about that issue until five years later when they were forced to. They attempted to do something		Allentown	

			under the radar to the community and with a lack of transparency. Fear of litigation was a reason given as well. This is a whole other story of lack of transparency.	
14	2/22/2023	Online	The major issues, in my opinion, are air quality or lack thereof, noise pollution, and vibrations all due to ever increasing truck traffic in the neighborhood. There are many mornings when the smell of diesel fumes is overwhelming, the noise, especially when windows are open, is disturbing, and the vibrations have caused many cracks in my walls and ceilings. I know that there is non-used entry/exit on the north end of the truck yard which needs to be developed to get the trucks out of the neighborhood. Thank you	Allentown
15	2/23/2023	Online	6PPD, which is used to keep tires from breaking down too quickly, acts with the ozone in the environment and transforms into multiple chemicals, including 6PPD-quinone, which is responsible for killing salmon. BNSF is not currently required to test for 6PPD in its stormwater Many other chemicals related to tire wear have been found to be toxic to humans and wildlife Air pollution from tire wear particles can be 2,000 times worse than what comes out of a car's exhaust During their lifetimes truck tires produce 8 x more particles because of their size Tires wear quicker on local roads than they do on freeways and highways. Expect these items to be researched for potential impact of truck traffic within 50 feet of residential neighborhood and community center.	Allentown
16	2/24/2023	Online	PAHs have been previously shown to be associated with adverse health effects resulting from both short-term and long-term exposure. In addition to dermal exposure, a potential PAH exposure pathway is via inhalation where PM size, the concentration of PM with bound PAHs, and the relationship between PM active surface area and bound PAHs determine the potential for adverse health effects (Polidori et al., 2008). Previous research has suggested that potential long-term exposure to PAHs include disease manifestation such as an increased risk of skin,	Allentown

17	2/26/2023	Online	lung, bladder, and gastrointestinal cancer (Boffetta et al., 1997; Armstrong et al., 2004; Olsson et al., 2010; Diggs et al., 2011). I expect the EIS to research the potential impacts to this residential community. Why is BNSF not required to test for 6PPD in their storm water? Certainly if they were to move their operations whomever they sold to would be required to adhere to todays standards and permitting and not those of late 1960's. !! What BNSF is getting away with is unacceptable. Look at what is happening currently in East Palestine, Ohio! Another		Allentown	
18	2/26/2023	Online	rail company not adhering to regulations. 6PPD, which is used to keep tires from breaking down too quickly, acts with the ozone in the environment and transforms into multiple chemicals, including 6PPD-quinone, which is responsible for killing salmon. BNSF is not currently required to test for 6PPD in its stormwater Many other chemicals related to tire wear have been found to be toxic to humans and wildlife Air pollution from tire wear particles can be 2,000 times worse than what comes out of a car's exhaust During their lifetimes truck tires produce 8 x more particles because of their size Tires wear quicker on local roads than they do on freeways and highways. Thank you Neighbors!!		Allentown	
19	2/27/2023	Online	Why haven't the concrete barricades been removed on 56th ave so and railroad street, the placement looks like special treatment for certain city residents. Especially after the new bridge over the river was built, everyone else can drive around except those few in that neighborhood?		Riverton	
20	2/27/2023	Online	The issue is that BNSF has corporate power and influence over the city and the residents are a nuisance to them. Reroute the entrance to Airport way! Done. BNSF has stated that this is too cost prohibitive for them but is perfectly fine with the city/state/feds paying to build them a new bridge. Protect our neighborhood and the Duwamish river that we live on. Get the trucks out of Allentown/Duwamish! The repeated accidents due to the railroads looking out for their shareholders and not the safety of the communities that they travel	My concern is that regardless of what the EIS determines and all the input from the residents that the BNSF will get exactly	Allentown/ Duwamish/ Quarry	

			through should be enough of a reason to relocate the entire Intermodal yard. But this is about the trucks and the time has come for BNSF to utilize their own property and leave the residential area alone.	what they want. The people who live in this neighborhood would be much better off without all the trucks. The city knows it, BNSF know it and they are going to do nothing but placate us with this EIS.		
21	2/28/2023	In-person Comment Form	Translated into other languages. Allentown is mostly comprised of minorities that do not speak English.			Yes
22	2/28/2023	In-person Comment Form	Residents breathe in truck and diesel fumes constantly. This includes burning rubber, burning breaks, idle fumes and general exhaust. At times my lungs sting and I can't breathe from the strong fumes. Fresh air and having windows open should not be a luxury. North entry avoids residential neighborhoods!		Allentown	Yes
23	2/28/2023	In-person Comment Form	Consider impacts on Chinook winds restoration Consider health impacts - fuel, tires leave chemicals in the river River is major salmon habitat. Trucks are on 115th by the river Consider socio-economic impacts Can Burlington Northern relocate?			Yes
24	2/28/2023	In-person Comment Form	Can I-5 have its own exit Consider Chinook winds restoration - PAH Chemicals from tires! Trucks are using 115 a lot, why? Consider health impacts! 115 is a ROUTE.			Yes
25	2/28/2023	In-person Comment Form	The Airport Way entrance is the only feasible option that avoids trucks driving by homes and parks. This will improve the quality of life for the entire neighborhood and reduce the environmental impacts to our homes and natural resources. It is imperative that the trucks not drive by our community center and parks		Allentown	Yes

26	2/28/2023	In-person Comment Form	The Airport Way option is the only feasible, realistic, practical option. No bridge is involved, no residential neighborhood is impacted, it is all industrial, flat ground and truck assessable. There is already a maintenance road there that could be developed easily	Allentown	Yes
27	2/28/2023	In-person Comment Form	Why are trucks using 42nd Ave S?		Yes
28	2/28/2023	Letter	Over 35 years ago, the Burlington Northern Rail redirected truck traffic to our residential neighborhood supposedly on a temporary basis. We have been trying to reroute the truck traffic every since. The last traffic count in 2018 cited 3000 trucks a day going through our neighborhood 50 feet from a community center where there are ball fields, a water park, picnic area, playgrounds and residential homes. Whether the count is 3000 or 30 it is still too many trucks going through a residential neighborhood. The community now has 40% of the people who live here born in another country. They have been and are being taken advantage of because their voices can not be heard. 6PPD which is used to keep tires from breaking down too quickly acts with the ozone in the environment and transforms into multiple chemicals, including 6PPD-quinonem which is responsible for killing salmon. I expect this to be researched for potential impacts to the community wildlife and river. Many other chemicals related to tire wear have been found to be toxic to humans and wildlife. Air Pollution from tire wear particles can be 2,000 times worse than what comes out of a car's exhaust. I expect this to be researched for potential impacts to the community, wildlife, and Duwamish River. During their lifetimes, truck tires produce 8x more particles because of their size. Tires wear quicker on residential roads than they do on freeways and highways. I expect this to be researched for potential impact.	Allentown	Yes

The Duwamish River runs through Allentown. I expect the EIS to research the potential impacts of tire particles from exhaust being left behind which are extremely toxic to salmon.

I expect the EIS to research the PAH chemicals in truck exhaust that fall onto streets, roofs, storm sewers and directly into the Duwamish River. They have been found to be in diesel emissions at truck stops and terminals They have been observed in soils and truck stops. PAH's major contributors to carcinogenic properties in diesel exhaust. Can be transported by air water and the soles of shoes. Some can readily evaporate into the air from soil or surface waters. Most do not dissolve easily in water. They stick to solid particles and settle to the bottoms of rivers and lakes. The PAH levels can be much higher in plants and animals than the soil or water in which they live. PAH chemicals have been previously shown to be associated with adverse health effects resulting from both short term and long term exposure. In addition to skin exposure, a potential exposure is via inhalation. Research has suggested that potential long term exposure, a potential exposure is via inhalation. Research has suggested that potential long term exposure to PAH's include disease such as increased risk of skin, lung, bladder, and gastrointestinal canter. (Armstrong et. al., 2004; Olson et al., 2010; Diggs et al., 2011 Boffetta et al., 1997) The more research I do the scarier to gets!!! How is all this air and water pollution being documented and analyzed?

Why is BNSF not required to test for 6PPD in their storm water? Certainly if they were to move their operations whomever they sold to would be required to adhere to today's standards and permitting and not those of late 1960's!! What BNSF is getting with is unacceptable.

The noise is intolerable with the constant truck traffic. They are always ignoring the no truck signs on 115th that turns into 42nd Ave S heading south and consequently the truck weight can damage the river banks and the water main that runs along that route.

Both of our important infrastructures are severely damaged due to truck traffic. (the 42nd Ave. s. Bridge and the freeway overpass on 129th going up to Skyway)

The last study in 2015 found the 48th Ave. S. off of Interurban Ave. S. option the best alternative. The entire street is commercial and dedicated to truck activity. It has two diesel fueling businesses, a motel that has 18 parking spots dedicated to semi trucks, two freight yards, a truck rental business, truck sales dealer, and a ditch witch business on this street. This street ends at the river. A bridge at this location would connect the south end of the yard. A bridge at this location would be approximately one hundred feet shorter across the river than the span across the river on 42nd Ave. Street bridge.

The north end of the BNSF yard is commercial as well. There is an old road on the west end of the BNSF property and a gate at very north end of their property off of Airport Way S. This option is very close to Interstate 5 as well.

It is important to for the EIS to have a full understanding of the decades long issue with these trucks we have had to deal with in our neighborhood. You should know how many studies we have gone through already and what that research determined was the best alternate routes. Tour the area more than once to fully understand the issue.

This issue affects the quality of life of an entire residential neighborhood. Our health, our children's health, our safety, the killing of salmon (thirty years ago the river was full of fisherman actually catching multitude of salmon here in Allentown) damage to river water, air quality, and chemical that run off into the storm sewers and soil.

I would be happy with the trucks being rerouted at either than the north end of the yard in the commercial area close to the freeway or on 48th Ave. S in another commercial area close to the freeway as long as the trucks are out of our residential neighborhood. Enough is enough!!!"

29	3/1/2023	Online	The neighborhood right next to the Tukwila Community Center should not be disturbed by massive trailers passing through the main roads. Causing traffic and going through tight spaces and getting stuck. Ruining the roads quicker and breaking our bridges. The bridge next to the community center should be for the residents or passing cars only not heavy duty vehicles. Now residents face the consequences of rerouting just to get home! Reroute the trucks out of the neighborhood!	When will the city actually begin to fix the bridge next to the Tukwila community center for two way traffic?	Allentown	
30	3/1/2023	Online	I live in Allentown next to the Duwamish Hill Preserve. I would like to see trucks re-routed out of our river side neighborhood, to a route along Airport Way or otherwise away from any rivers and family residences. The pollution, noise, and increased traffic from the trucks negatively impacts my quality of life as a resident, and negatively impact the river and environment here. 6PPD, which is used to keep tires from breaking down too quickly, acts with the ozone in the environment and transforms into multiple chemicals, including 6PPD-quinone, which is responsible for killing salmon. BNSF is not currently required to test for 6PPD in its stormwater Many other chemicals related to tire wear have been found to be toxic to humans and wildlife Air pollution from tire wear particles can be 2,000 times worse than what comes out of a car's exhaust During their lifetimes truck tires produce 8 x more particles because of their size Tires wear quicker on local roads than they do on freeways and highways.		Allentown	
31	3/6/2023	Online	As I drive on Boeing Access Road, there are two road ways in & out, of BNRailyards that the semi trucks, should use to access & depart the, BN rail yards instead of them, driving on 42nd Ave S.			
32	3/6/2023	Online	This is my opinion on the reroute. I feel that the best route would be a ramp up to Airport Access Road and or I-5. If you have to put it on the road where Harley and Denny's used to be I think it would disrupt the hotel and other businesses with traffic unless you build a completely separate road and ramps to I-5. I've lived in Tukwila since 1978; the trucks shouldn't be going through neighborhoods and they should get an easier route to access the freeways.			

33	3/6/2023	Online	BNSF has at least two dozen catch basins. They are required to treat the water and filter it but there is no testing for chemicals. The catch basins can only take so much. During extreme weather when the catch basins are overwhelmed do chemicals go directly into the Duwamish River and endanger salmon and wildlife? I expect the EIS to research and analyze this issue.		Allentown	
34	3/7/2023	Online	What do I love about my community? Its diversity, the people are wonderful neighbors, the Duwamish river flowing through, the wildlife of salmon, seals, ottors, raccoons and eagles, how I-5 and I 405 are merely 2-5 minutes away, how any store or business is mere minutes away, my healthcare is mere minutes away, police and fire come when called and are excellent professionals, (when living in Tacoma police were not guaranteed to come when needed) and the community center.		Allentown	
35	3/8/2023	Online	I have lived in Allentown for over 30 years. I always called us the ""forgotten neighborhood"" and until the sewers went in (we were all septic tanks) we were. Now there are \$800,000 houses next to trailerslol. We are growing and the truck traffic has grown as well. The rail yard has increased its business along with all that. The traffic count in 2018 said that over 10,000 vehicles a day come through Allentown and a third of that are trucks. That would be 3000!! That makes one every 30 seconds 24 hours a day. The railroad disputes that number, they say it is only about 800 coming in. Well 800 in and 800 out is 1600 and that is one every 60 seconds or so Still too many in a residential neighborhood. I have seen all the studies and seen all the different routes they have proposed and there is really only one feasible, practical, economical option Airport Way entrance could be developed in a matter of months without the need to build a bridge. It is away from any rivers, residential neighborhoods, small businesses and the route in would be entirely in industrial areas. A no brainer.	I do have concerns that the BNSF has so much influence over the decision that they will just shoot down anything that has them rearranging their yard in any way. It seems that we put in all kinds of effort in on our side of the property line but they are not willing to meet us half way to make changes.	Allentown	
36	3/9/2023	In-person Comment Form	Acknowledge entire neighborhood is truck route What warrants a study Community impact River impact Lack of sidewalk - combined w truck traffic	J		Yes

			*Norfolk	
37	3/9/2023	In-person Comment Form	Trucks broke the (Allentown) bridge – should be required to pay to replace it! This damage has caused public to detour a residential St. – more dangerous (no shoulder, blind turns, drug dealing). Unfair to public. BNSF railroads should be heavily repurified (sp?)	Yes
38	3/9/2023	Email	Dear Mark Hafs, Thank you for the opportunity to comment on the Allentown Truck Reroute for the BNSF Intermodal Facility. Our Tribe has been on the Duwamish, Black, Cedar and Green Rivers since at least the Vashon Stade of the Fraser glaciation thousands of years ago. We have also been present around Lake Washington and Lake Sammamish as well as tributary streams in and around King County, Washington. Our culture and practices fostered trade and relationships between tribes in the immediate vicinity as well as in other regions of the state. Our presence helped the European Americans establish themselves in and around West Seattle, the city of Seattle and the ensuing suburbs in the central Puget Sound region. Within a decade or less of welcoming the settlers, the Duwamish were marginalized and relationships between the Duwamish and other tribes inhabited, used for resources and sacred sites, were occupied by the settlers, and stripped of their natural resources. The careful land management by the Tribe was discarded and traditional food and natural resources began to dwindle for the Duwamish and other tribes. By 1920 engineering projects around Seattle permanently changed the landscape for the Duwamish and other tribes. The straightening of the Duwamish River eliminated the estuary and marshlands used by the Duwamish River eliminated the estuary and marshlands used by the Duwamish and other fish and wildlife. The Duwamish River is a salt wedge river that gradually becomes fresh water some distance up the river. This is a place where salmon can acclimatize to fresh water when they return to their spawning grounds. Without the estuary and the natural meandering of the Duwamish River, this severely reduced fish and wildlife and starved out our people. The straightening of the river also allowed for industrial transport and pollution of the water. To further allow transport for larger marine traffic, the river was	Yes

dredged. The dredged sediments and the sediments from the regraded areas of Seattle created Harbor Island, a shipping container location for transport. The dredged materials were also used to fill in the estuary, covering our waterways and lookouts, and created what is now known as SODO (south of downtown). The creation of the Ballard Locks allowed for the Montlake Cut, which had been a seasonal canoe passage between Lake Washington and Lake Union by our people. These projects lowered Lake Washington which subsequently dried up the Black River to a now riparian forest. The Black River is the birthplace of the Duwamish and its chief, Chief Seattle. The Black River was home to abundant salmon and was the outlet for Lake Washington and drained into the Green/Duwamish Waterway – and at times, the Black River reversed flow during high tides and flooding.

Within a short span of time, our land, people, and resources were devastated. To preserve our ancestors' memories and our way of life, the cultural preservation department is vital to our tribe and its link to the past. The knowledge of our ancestors has been lost due to the occupation and the transformation of our waterways. To continue our existence, we need to maintain and relearn what we have lost for our children. The awareness and culture of the Duwamish is not just vital to our children, but to those who now live on our occupied land. Our ways and traditions stewarded the land, conserved resources, and respected life.

Our ancestors left behind tools of their lives that are now buried within sediments a few feet underground in and around Seattle and along our river, the Duwamish. After reviewing the draft cultural resources assessment for the BNSF Intermodal facility provided by the City of Tukwila, the Duwamish Tribe would favor an alternative access route that is farthest from a known archaeological site, that does not adversely impact the environment of the Duwamish River and does not cross near our current sacred sites which include, but not limited to, the Duwamish Hill Preserve, Chinook Winds and North Winds Weir.

			For all the alternatives currently listed in the BNSF draft cultural assessment from 2016, the DAAP WISAARD predictive model indicates that an archaeological survey is highly advised with a very high risk of encountering cultural resources. The Duwamish Tribe would recommend an archaeological review performed for this project if there will be any development that involves ground breaking or excavation below current fill. We would also request that any bore logs and/or a geotechnical report associated with the project is made available to us to help narrow down future comments. This is in an area the Duwamish Tribe considers culturally significant and has a high probability to have unknown archaeological deposits, especially if excavation cuts below fill. We also request that if any archaeological work or monitoring is performed, we would like notification. Cultural and archaeological resources are non-renewable and are best discovered prior to ground disturbance. The Tribe would also like the opportunity to be present if or when an archaeologist is on site in the event that an artifact or cultural resource is encountered. While our focus is on preserving our cultural resources, we also support and recommend the removal of invasive species and noxious weeds and replace any proposed landscaping with only native vegetation to increase habitat for native fish, wildlife, avian life and pollinators. Thank you			
39	3/10/2023	Online	There are three options to access the north end of the BNSF rail yard. Through their old gate off of Airport Way, directly off of Boeing Access road and off the corner of Boeing Access Road and E.M.W. S. This commercial side of the yard is definitely a preferred alternative. A plus a bridge wouldn't have to be built. Studies should be done on the soils, noise, air quality, ground water, vibrations, river and wildlife. (wildlife in Allentown include salmon, geese, eagles, raccoons, seals, and otters that live by the Duwamish river.)		Allentown	
40	3/10/2023	Online	There is no reason for BNSF truck traffic to continue going through the Allentown neighborhood. There are more suitable sites both north and south of the neighborhood that would make better	How will you be more inclusive of non-English	Allentown	

			entrances. The neighborhood has grown rapidly in recent years with new families, and the truck traffic - with the additional issue of the 42nd Ave bridge currently down to one lane - cannot continue at the same rate. Yes, there are restrictions on speed and weight, but that does not mean that the trucks are following these laws, and there aren't police resources available to be able to monitor them on a daily basis. Trucks are still using 115th and 42nd ave along the river even though there are multiple signs saying NO TRUCKS. The intersection of 42nd Ave and 124th is heavily used, with residential traffic, truck traffic, school bus stops, community center access, etc. Having trucks speed up and down 124th is not ideal for the community. Additionally, heavy truck traffic causes additional air pollution and extensive wear and tear on roads, all of which impact residents' health. I feel that the BNSF truck entrance can be moved, but it all comes down to politics and money, and not what is good for the residents of Tukwila.	speakers in this process? Even the announcement that interpreters can be requested was in English.		
41	3/10/2023	Online	Are quiet and slow neighborhood is home to many different birds, ducks, geese, and rabbits I've even seen a otter cross the road. The trucks have no regard for them I have seen many dead on their route out of allentown. The river here is a safe haven for these animals. The train company really should just build their own Road I mean come on they've got more money than Jesus right?		Allentown	
42	3/11/2023	Email	Hello, I am submitting comment for the Scoping period, Allentown Truck Reroute Project. I am glad to see that maybe, finally, at the end of this process, Tukwila will have been able to fulfill the 30 plus year promise of moving a steady stream of trucks out of a residential neighborhood and also provide better access to the intermodal yard for freight movement. I have attached a PowerPoint as part of my comment. Submitted to the City a year ago, most of it continues to be valid. In addition, I'm disappointed the city has lacked imagination on this whole project; from not repurposing the old bridge (even for			Yes*

			pedestrians), to simply picking the proposed boring replacement bridge out of a catalog. *PowerPoint presentation available in PDF			
43	3/12/2023	Online	Reroute commercial trucks to an alternate route. Residential streets have become to dangerous the increase of commercial trucks and the city has a perfect opportunity to reroute the traffic now. Especially since the bridge is being rebuilt allows both residents and truckers to acclimate to new routes and signage.	Please listen to the residents valid concerns	McMicken	
44	3/12/2023	Online	Constant truck traffic negatively affects the health of the Duwamish River and all of it inhabitants, fish, birds, seals, otters, beavers, etc. Exhaust emissions, tire emissions, noise emissions etc, all affect the environment. Allentown is residential neighborhood, not a freeway thoroughfare. Our roads and bridges not equipped to handle the impact of all these heavily weighted vehicles at all times. Please reroute all trucks asap	Heavily concerned with the impact of the Duwamish River during any rerouting process. Please respect the river and surrounding wetlands	Allentown	
45	3/13/2023	Email	Dear Mr. Hafs, On behalf of The Northwest Seaport Alliance (NWSA), we welcome the opportunity to provide scoping comments on the Allentown Truck Reroute Project. The Northwest Seaport Alliance is a port development authority governed by the ports of Seattle and Tacoma. The NWSA unifies management of the ports' marine cargo facilities and businesses to strengthen the Puget Sound gateway and attract more marine cargo and jobs to the region. In 2017, facilities managed by the NWSA supported 58,400 jobs and \$5.8 billion in economic impact. The BNSF's South Seattle Intermodal Yard has long been an important facility in its rail network, supporting the movement of domestic cargo. This includes import cargo arriving at the Port's and NWSA's container facilities destined for the Midwest and East Coast. That cargo first moves to transload facilities in the region, where it is transferred from ocean-going 40' to domestic 53' containers before it is trucked to the South Seattle Intermodal Yard. This provides Washington exporters with empty 40' ocean-going containers that can be used to move agricultural and other products made in			Yes

			Washington through NWSA facilities. The railyard benefits the entire state. The NWSA appreciates that the City of Tukwila has provided a home for this important facility for many years. We encourage the movement of cargo by rail over long distances because it is more sustainable than the movement of cargo by truck: Freight trains can carry a ton of cargo for almost 500 miles with just a single gallon of diesel. At the same, we understand that the proximity of the railyard to the Allentown neighborhood poses safety, environmental and health risks, raising equity considerations. For these reasons, the NWSA would like to congratulate Tukwila on the restart of the effort to find a better route for trucks serving the BNSF's railyard. In reviewing prior alternatives assessment materials, we noticed that these efforts did not yet include an assessment of traffic impacts. We would like to encourage you to include a thorough analysis of the traffic impacts of the potential new routes both on trucks serving the rail yard, and on trucks that may be impacted by these routes, in the transportation element of the EIS. Travel time and reliability are important criteria for truck freight performance, with related impacts on air quality and noise. We look forward to the results of the scoping process and the Draft EIS. Please do not hesitate to contact me at XXX or XXX with any questions or comments.		
46	3/14/2023	Online	6PPD chemicals from truck tires are killing Coho Salmon. Please research this as the Duwamish River runs directly adjacent to Allentown.	Allentown	
47	3/14/2023	Online	Please move Truck traffic from our neighborhood. Issues are polution, public / kids safety as S. 124th is where Community Center is and preschool. There are South and North alternatives that do not go through any neighborhood but commercial properties. Thank you.	Allentown	
48	3/15/2023	Online	My name is Bryce Weaver and I live off 44th Ave S and S 118th St in the Allentown neighborhood. I have lived in this neighborhood since June of 2018. I am a registered nurse, have a background in community health, and am currently working with people with sleep disorders. I can't ignore my responsibility to advocate for and protect my family, neighbors, and community from the dangers of having semi-trucks routed through our neighborhood.	Allentown	

Last time I checked, the Duwamish river and surrounding area is listed as a "Critical Area" with signage to support this. The signs say "Protection of this area is in your care." I am extremely environmentally conscious and have witnessed the positive changes in the type and amount of wildlife that also call this community their home.

My concerns regarding the environmental impact of semi-trucks using our neighborhood to get to and from the freeways include increased risk to pedestrians and car accidents, physical, noise and air pollution, increased waste runoff into the river, degradation of the riverbanks and arterial roads that line the river, increased traffic, and more.

I strongly support the commonly held preference of not allowing semi-trucks to use the surface streets and arterials of the Allentown neighborhood. I think that BNSF needs to have access to their facilities for the semi-trucks serving their rail yard that does not include the use of surface streets and arterials in the Allentown neighborhood. These trucks should not be allowed to use S. 124th St as it passes between the homes of Allentown's residents and the community center, they should not be allowed to pass through the Allentown neighborhood, and they should not be allowed to use the 42nd Avenue S bridge, S. 115th Street, or 42nd Avenue S. I do not think that the S. 129th Street Bridge is a viable long term solution for accessing Martin Luther King Jr. Way, as it has a strict weight limit, steep grade, and a history of events that have likely weakened it's structure.

BNSF needs a direct connection to Boeing Access Road or I-5, period.

Allentown is a neighborhood where families live, and children play. We walk and ride our bikes. We enjoy this small pocket of the river valley that is Allentown, and I like to think that many of us are caretakers of the Duwamish River Valley. I strongly believe that this neighborhood is no place for semi-trucks. I am so tired from the nonstop noise from BNSF and the trucking industry. We need the City of Tukwila to help protect our community.

49	3/15/2023	Online	Allentown is positioned along the Duwamish river, our nation's largest superfund site. This river was the center of multiple indigenous native communities and has remained poisoned by literal war profiteering during WWII. Allentown is textbook example of Environmental Racism that requires Environmental Justice to remediate. We've seen how powerful railroads which lobbied for laxer safety standards and workers benefits while executive receive record bonuses. Meanwhile Norfolk Southern has had at least 4 (5?) accidents since the catastrophic crash in East Palestine. Any EIS should weigh our neighborhood's proximity to a railroad company who had record profits during the pandemic and who've refused for decades to spend any resources to reroute their heavy truck traffic through the neighborhood—those trucks' emissions and the threat that degrading commercial tires present to the native salmon population that relies on the Duwamish. The trucks and railroad's hostility to mitigating their impact is just the latest ways in which the health of a working class community with a high BIPOC populations' health subsidizes the profits of big industry in the present. We have two bridges in this neighborhood in critical need of repair/replacement that receive heavy commercial traffic. The damage to the 44th St. bridge is a direct result of negligence on the part of that commercial traffic impacting our neighborhood everyday. If either bridge is further damaged, the neighborhood becomes cut off from the rest of the city as well as neighboring cities directly impacting every person in this neighborhood's ability to work, access grocery stores, and would further exacerbate the impact of the already heavy truck traffic.	Allentown
50	3/15/2023	Online	There is a proposal that cuts through ""behind"" (to the East) of the Duwamish Hill Preserve. The Allentown community already fought long and hard to save the Preserve from industrialization. Let's not risk undoing all of that hard work. Possibly more importantly, my understanding is that there are wetlands back there.	Allentown 44 th Ave
51	3/15/2023	Online	I support the alternative that has BNSF receiving directly off of Airport Way.	Allentown 44 th Ave S

			It is the only 100% already industrialized space and poses the least long term environmental impact. No trucks driving over waterways, specifically.	
52	3/15/2023	Online	I support the alternative that has BNSF receiving directly off of Airport Way. The placement would provide the opportunity for the project costs to be divided among stakeholders since the area of this proposed alternative would include multiple jurisdictions - City of Seattle, City of Tukwila, King County, State of WA, Federal? & private (BNSF/Warren Buffet).	Allentown 44th Ave S
53	3/15/2023	Online	I was late to the start of this party but in my opinion this study should have originally been called Minimization and Mitigation of Overall Impacts of BNSF Intermodal to the residents of Tukwila's Allentown Neighborhood. The negative truck influence along the existing ingress/egress route on S. 124th St maybe at the top of the list of priorities but it is just part of the many negative impacts related to this incompatible adjacent land use that should never have been allowed to evolve to this magnitude in this location. More on this below. On the truck re-route I think the most feasible options in terms of an expedited time frame and reasonable costs are #1. Going out the north end of the yard under the Boeing Access Rd Bridge to a reconfigured and lighted intersection at Airport Way S. or #2. Going out the northwest end of the yard at the Seattle City Light Transmission Corridor that aligns with S. 112th St. I've heard comments that this is not a good option because there are existing utilities there. Almost all significant road improvement projects include wet and dry utility installation or modifications as needed. I wouldn't think this should be a deal breaker. The other 2 or three reroute options would require a new bridge which is probably cost prohibitive and could take a decade or more to achieve which combined is probably a deal breaker. More from above and issues that need to be addressed whether the truck traffic is routed north through the yard or not: Just as the residents along S 124th St and users of the Community Center	

and tire residue laden runoff, ground tremors and noise pollution at all hours of the day/night, so do the residents of the 60 to 70 dwelling units immediately adjacent to or within the influence zone of the entire property boundary with BNSF. Railroad design studies indicate that truck, and moreover, rail tremors can be equal to a 2.2 earthquake and these occur multiple times a day in Allentown. The cracks in my interior plaster are proof of the long-term impacts that surely many other home owners have experienced.

The noise pollution from the engines of the top loaders rev'n up and dropping containers or the three different ear piercing back up safety beepers going off from different vehicles at 3:30 a.m. all at once is ridiculous. The equipment drivers can be heard playing tootsie horn greetings back and forth in the middle of the night. Completely careless and seemingly unaware that folks are trying to sleep. The safety beepers are only required to be loud enough to create an alert over the ambient noise level in the vicinity during a quiet night! Similar to the muffled and much more palatable Fed-X or Amazon delivery truck beepers that back up on our residential streets with kids on bikes, pedestrians, people in wheelchairs etc.

The area lights in the yard glare directly into the neighbor's properties and residential bedrooms / living spaces. Given the size and proximity of this facility to so many homes it would be considerate if these lights were lower and equipped with 45 degree cut off shields to minimize the nuisance as suggested in typical Dark Sky Ordinances.

I have suggested the truck re-route options that I prefer but in considering the options the consultant team needs to weigh the existing impacts that the above items have on this community. BNSF needs to be held to becoming a better neighbor. No where else in this entire region does a train yard of this scope exist immediately next to a residential community. They are all shrouded in other industrial or commercial land uses. Light rail corridors that just pass by many neighborhoods have a noise attenuating wall or fence along the interface. This should be a minimal expectation and prudent best management practice to consider for this unfortunate disruptive industrial condition that has been allowed to occur next to this

			neighborhood. This area was a residential community that existed here well before this monstrosity of an industrial operation was allowed to develop next to us and the residents deserve reasonable peace and quiet and safety just the same as every other neighborhood in Tukwila.		
54	3/15/2023	Email	To Whom It May Concern: I support any re-routing proposal which will remove heavy truck traffic to and from the BN from the Allentown neighborhood streets without just rerouting the same traffic through another residential area where it would cause the same problems or shaken hopes, cracked walls and foundations, noise pollution, exhaust fumes, etc The rerouted traffic should also avoid any sensitive environmental areas such as river banks and wetlands except for the immediate vicinity of any new bridge which may need to be constructed. The location for a truck bridge which makes the most sense to me		Yes
			would be one across the Duwamish River connecting the rail yard to 48th Place S. and to Interurban Avenue. Alternatively, the north entrance from Airport Way S. just north of the Boeing Access Road Bridge seem to be another logical choice.		
			The Duwamish Allentown neighborhood is both thriving because of its excellent location and relatively affordable housing, but it is also struggling because of the ongoing fight against overdevelopment and heavy truck traffic issues.		
			Please take these concerns and preferences into consideration when making the final rerouting decision.		
55	3/15/2023	Email and Letter	Re: Comments on the Scope of the Environmental Impact Statement for the Allentown Truck Reroute Project (the "Project") Dear Mr. Hafs: This firm represents Strander Family, LLC I and Strander Family, LLC II (the "Strander Companies"), owners of six properties leased to four commercial tenants along 48th Avenue South, in matters related to		Yes*

behalf to submit comments on the scope of review under the State Environmental Policy Act (SEPA) being carried out by the City of Tukwila (the "City") for the Project.

The current iteration of the Project is not the City's first time considering a potential alternative location for a primary vehicular access route to the Burlington Northern Santa Fe ("BNSF") Intermodal Facility, which currently runs along 42nd Avenue South (over the existing 42nd Avenue South Bridge) and South 124th Street (the "Current Route"). Most recently, the Project was studied in 2015-2016, though the effort was ultimately tabled. See BNSF Access Study Project Update, August 10, 2015; City of Tukwila Endangered Species Act Screening Checklist (December 6, 2016) ("2016 Checklist"). Two decades prior, in the late 1990s, the City similarly studied and considered alternatives for new access to the BNSF Intermodal Facility. See City of Tukwila Transportation Committee Agenda, March 10, 1998. One alternative considered was a route along 48th Avenue South (the "48th Ave. S. Alternative"). As the Strander Companies detailed then, the 48th Ave S. Alternative was (and is) costly compared to alternatives; would significantly disrupt existing businesses; and would severely and negatively impact traffic flow to and from I-5. In response to these concerns and others, the 48th Ave. S. Alternative was removed from the City's considerations. See Tukwila City Council Meeting Minutes, September 25, 2000. While the same concerns that caused the City to abandon the 48th Ave. S. Alternative remain—

and more have arisen since—the City has signaled its openness to reconsidering that route as a potential alternative for the Project.

The Strander Companies would be significantly affected by and are opposed to the 48th Ave. S. Alternative. We and our client understand and share the City's interest in creating a harmonious solution that balances safe and efficient commercial truck traffic and the peace and safety of Allentown residents. As the City reiterates in its scoping notice, "[t]he purpose and need for this project is to develop an alternative route to the BNSF Intermodal Facility in Allentown to improve livability and safety in Allentown, without compromising the operations of the intermodal facility." We do not

believe that goal is served by the 48th Ave. S. Alternative, which will have significant and disproportionate impacts on the natural and built environment well beyond those caused by other viable alternatives.

While the 48th Ave. S. Alternative has been part of the Project discussion for decades, we encourage the City to take a fresh look at the environmental context and exercise its due discretion in considering only those alternatives that are reasonable today. See Solid Waste Alt. Proponents v. Okanogan County, 66 Wn. App. 439, 446 (1992) [hereinafter "SWAP"] (The [City] is not required to explore every conceivable alternative."); WASH. ADMIN. CODE1 [hereinafter "WAC"] 197-11-440 (clarifying that, under SEPA's mandate to explore "reasonable alternatives," "[t]he word 'reasonable' is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative") (emphasis added). As our courts have made clear, community displeasure alone cannot be the basis for selection of alternatives. See Maranatha Mining, Inc. v. Pierce County., 59 Wn. App. 795, 804, cited in SWAP, supra. Rather, the City's

selection of alternatives—and ultimately, of the Project site—should be driven by current data regarding the wide variety of appropriately considered environmental impacts, not by adherence to an outdated list of potential sites that was developed more than two decades ago.

Accordingly, we urge the City to decline to include the 48th Ave. S. Alternative in its Environmental Impact Study (EIS) and to focus on more viable alternatives, including the Current Route.2 For the reasons outlined below, the 48th Ave. S Alternative should be excluded from the City's ongoing SEPA review of the Project.

I. SCOPING

The Determination of Significance/Scoping Notice for the Project, issued by the City on February 14, 2023, states that an EIS will be prepared for the Project. Given its scale and geographic context, we agree that the Project is likely to have significant impacts on various aspects of the built and natural environment, which will be heightened or decreased depending on the alternative chosen.

We encourage the City to take a hard look at the breadth of these impacts in choosing alternatives and evaluating the Project. Because "scoping is intended to identify and narrow the EIS to the significant issues[,]"3 we particularly urge analysis of the following:

A. Duwamish River Water and Habitat Impacts.

The presence of the Duwamish River in the Project area should factor heavily into the City's evaluation of the Project alternatives and their relative impacts. Any proposal that involves construction of a new bridge across the Duwamish River—rather than a non-river route or use of an existing bridge—is likely to significantly and negatively impact the river. Construction and the placement of permanent support structures will impact the river banks. Road runoff from cars and trucks crossing the new bridge will impact water quality, in turn affecting the plants and animals therein, including endangered salmonoid species. The increased traffic over a previously undisturbed section of the river will ultimately impact fish migration. Any such impacts to fish habitat and access may also constitute a violation of tribal treaty rights.

B. Traffic.

The 2015 BNSF Access Study SEPA Checklist suggested the Project in its then-current iteration would cause no significant traffic impacts because there would be no net change in the number of vehicle trips that would occur in light of a reroute of existing traffic. However, there will be significant impacts to the flow of traffic throughout the Project area depending on the alternative chosen, impacts that we encourage the City to fully evaluate. The impact of the addition of a significant amount of truck traffic to existing traffic along the alternative routes must be considered, including the impacts to businesses and residences along those routes.

C. Current Route Updates Since Previous Study.

Since the City's previous studies of the Project in the late 1990s and 2015-2017, the City has recently and independently approved replacement of the 42nd Ave. S. Bridge, which is part of the Current Route. Therefore, many of the assumptions of environmental and economic impacts identified in previous studies must be

reevaluated, in light of the separate 42nd Ave. S. Bridge replacement already underway. For example, the 2017 Alternative Screening assumes replacement of the 42nd Ave. S. Bridge would be a required component of the Current Route. Because the replacement of the 42nd Ave. S. Bridge and related traffic improvements already are occurring independently, any associated environmental impacts should not be included in an assessment of the environmental impact of the Current Route alternative under this EIS.

D. Loss of Commercial Lands.

Several of the alternatives identified in previous study, including the 48th Ave. S. Alternative, would cause significant loss of important industrial and commercial lands in the City. The proposed conversion of commercial and industrial lands ought to be thoroughly analyzed in the EIS because such losses will affect the long-term economic prospects of the City and its residents. Relatedly, the Strander Companies urge the City to realistically and accurately analyze the costs associated with acquiring private property necessary for each of the alternatives, including appropriate compensation that may be required in the taking of any private land for the Project.4

E. Alternatives Analysis

An EIS must focus on a project's "probable significant adverse impacts and <u>reasonable alternatives</u>[.]" WAC 197-11-408(1) (emphasis added). A "reasonable alternative" is "an action that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." WAC 197-11-786 (emphasis added). As has been the case for the nearly three decades during which the City has considered some iteration of the Project, the 48th Ave. S. Alternative is not a reasonable alternative given its significant environmental impacts, as described below. Accordingly, the Strander Companies encourage the City not to include the 48th Ave. S. Alternative in the EIS, and instead focus on reasonable

alternatives that do not involve such significant construction, costs, environmental impacts, and private property takings.

II. THE 48TH AVE. S. ALTERNATIVE IS NOTE A REASONABLE ALTERNATIVE.

A. Air Quality.

The 48th Ave. S. Alternative would involve the construction of a new bridge spanning the Duwamish River, located only approximately 350 feet north of the existing I-5 bridge. So much car and truck traffic concentrated in such a small area, especially one crossing a river, is likely to lead to significant air (and water) pollution concentrations. Those cumulative effects would be avoided through adoption of any of the other alternatives already under consideration, or new alternatives that don't involve additional construction so close to the interstate.

B. Water Quality.

As explained in Section I(A) of this Comment, the construction of a new bridge will significantly impact the water quality of the Duwamish River by causing runoff from the new roadway and other water impacts. These water quality impacts are significantly greater for the alternatives that require construction of a new bridge over the Duwamish River than for the Current Route and alternatives that do not require construction of new river crossings. Moreover, like air pollution, the water quality effects of placing two highly trafficked bridges only 350 feet apart must be considered.

C. Animals, Specifically Endangered Species.

Relatedly, the inevitable and detrimental impacts to the Duwamish River that the 48th Ave. S. Alternative would cause would directly impact the fish species therein. The 2017 BNSF Intermodal Facility Access Study identified the presence of Chinook salmon, steelhead trout, and bull trout in the Duwamish River, all of which are identified as "threatened" under the Endangered Species Act. David Evans and Associates, BNSF Study, April 17, 2017. Building a new bridge across the River would unnecessarily harm these threatened species. In particular, as explained by the Muckleshoot Tribe in 2000, any alternative that involves construction of a new bridge over the Duwamish River will have problematic direct and indirect impacts upon Chinook salmon's spawning and migration routes. Letter from Tribal Attorney K. Allston to K. Adams Pratt, dated April 14, 2000

("Muckleshoot 2000 Letter") (attached). Since that time, the fragility and health of our native salmon populations has only become more dire. Road runoff from chemicals in tires (specifically, 6PPD-quinone) are directly responsible for the death of coho salmon in the area.5 Construction of a new bridge would increase turbidity in the River and unnecessarily increase shade over the River, further harming habitat. 2016 Checklist at 5.

In addition, a new bridge would increase public access over the River, which may impede or delay upstream Chinook salmon migration, increasing the level of stress experienced by the salmon and increasing pre-spawn mortality. Muckleshoot 2000 Letter at 2. Finally, not only would a new bridge harm the fish directly, but it would violate the Muckleshoot Tribe's federally protected treaty rights to access its usual and accustomed fishing areas and right to take fish from these areas. Id. at 3. The proposed 48th Ave. S. bridge is the location of such

historic treaty fishing, and impairment of these treaty fishing rights is unlawful. Id.

D. Shoreline, Recreation, and Land Use

The Duwamish River is a shoreline of statewide significance, within the City of Tukwila's Shoreline Overlay District. See Tukwila Shoreline Master Program at 2 (Mar. 2, 2020). Therefore, selecting any alternative involving construction of a new bridge across the Duwamish River, including the 48th Ave. S. Alternative, would significantly and unnecessarily impact a portion of shoreline land. In addition, construction of the bridge would require significant land disturbing activities in Critical Areas regulated under Tukwila Municipal Code 18.45.030.

Relatedly, the 48th Ave. S. Alternative would interfere with the existing Green River Trail, one of the longest continuous regional trails in the Puget Sound region. The Green River Trail runs along the western portion of the Duwamish River and would be interrupted or need significant modification to accommodate a new bridge along 48th Ave. S. Construction of a 48th Ave S. bridge would also require removal of the several public parking stalls located on the west side of

the river, which are used for access to the Green River Trail. These unnecessary modifications to the Green River Trail would appear to conflict with the City's Comprehensive Plan Parks, Recreation and Open Space goals. See Tukwila Comprehensive Plan, Policy 6.1.5 ("Increase physical and scenic connectivity with the Green/Duwamish River."); Policy 6.2.1 (encouraging "[p]reservation of and public access to community landmarks that help make up the City's identity, including the river and historic sites").

The 48th Ave. S. Alternative would also require the acquisition of a significant portion of fully developed private property. While 48th Ave. S. spans a relatively short distance, it is home to numerous businesses including several gas stations, a hotel, a construction equipment supplier, and a truck rental company. We understand that the 48th Ave. S. Alternative would involve the widening of the road, so as to physically impact the existing businesses. The cost of doing so—

including providing appropriate compensation for any such takings—will be significant, especially in comparison to the other proposed alternatives with fewer existing improvements at risk.

E. Historic and Cultural Preservation

As discussed in the attached Muckleshoot 2000 Letter, the development of a new bridge at 48th Ave. S. over the Duwamish River would directly and illegally violate the Muckleshoot Tribe's federally protected treaty fishing rights. See United States v. Washington, 694 F.2d 1374, 1381 n.15 ("The State's obligation to take reasonable steps to preserve and enhance the fishery applies to the grant of State permits as well as to the State's own projects."); Muckleshoot Indian Tribe v. Hall, 696 F. Supp. 1504, 1510 (W.D.WA 1988) ("The right to take fish at all usual and accustomed fishing places may not be abrogated without specific and express Congressional authority.").6 The City is required to consider the legality of the Project in reviewing the significance of its impacts under SEPA. See, e.g., WAC 197-11-330(3)(e)(iii). Given the potential for the invasion of the Tribe's treaty rights, the 48th Ave. S. Alternative cannot be considered a "reasonable alternative" for the Project.

F. Traffic and Arterial System Impacts

For all options except the Current Route, the traffic impacts would be significant and must be a central consideration. The 48th Ave. S. Alternative would be particularly problematic. Trucks traveling south along I-5 to the BNSF Intermodal Facility would exit I-5 at exit 156 on a short offramp, turn right onto Interurban Avenue S. then almost immediately right again onto 48th Ave. S. This will predictably create a traffic backup not only for trucks and other vehicles turning onto 48th Ave. S. but also for any cars getting off at exit 156 and attempting to travel elsewhere along Interurban S.

Moreover, unlike each of the other identified alternatives, 48th Ave. S. is not a designated arterial.7 Accordingly, routing trucks along 48th Ave. S. would either violate or require revision to the Tukwila Municipal Code's functional arterial system.

G. Impacts to the Built Environment

The 48th Ave. S. Alternative would have significant impacts on existing businesses and infrastructure in the area, which previous SEPA review of the Project has underestimated and downplayed. For example, the 2016 SEPA Checklist concedes that "[g]uests at the Days Inn could

experience intermittently higher noise levels" from the truck traffic. 2016 Checklist at 14. Such noise impacts would be detrimental to the Days Inn's business, as increased truck traffic noise outside a hotel would inevitably and significantly decrease demand of the hotel. In addition, the 48th Ave. S. Alternative, unlike the other alternatives, would require the City's acquisition of at least 25,000 square feet of private property, the cost of which was not adequately addressed in prior study, and has only increased in the time since last considered.

III. CONCLUSION

We appreciate the City's serious consideration of the potential environmental impacts of the Project as it completes scoping and selects appropriate alternatives for study. As is evident from past study and the concerns and impacts discussed herein and in other comments, the Project will result in significant adverse environmental impacts to many elements and sub-elements of the natural and built

			environments. We have laid out several of the impacts we understand to be of most concern at this early juncture but trust the City will conduct a full and appropriate analysis of all elements, taking into account changes in conditions since previous studies of the Project were conducted. In so doing, we believe it will be clear that the 48 th Ave. S. Alternative is unreasonable, disproportionately harmful to the environment, and should not be included in the Project EIS. Thank you for your consideration of these comments. *Additional attachments available in PDF			
56	3/16/2023	Online	As long time Allentown resident I've always believed 48th is the best alternative route for trucks, anyone who's actually been on that street is foolish not to agree. Almost all truck related businesses on that street, including truck shipping depot. Please see the two previous studies that also indicated 48th was the best option. I live at 4023 S. 114th St., on the hill directly above the North end of the BNSF intermodal yard. Thus I'm NOT in support of the Airport Way alternative, because it will impact my home and my neighbors homes with added noise, pollution, and all the negative aspects of truck traffic moving near our homes 24/7.	In my opinion the worst case scenario is the EIS determines the existing truck route (brand new 42nd bridge) is the most feasible solution. Second worst case is the EIS determines the preferred route should be 48th (for example), but then the City doesn't have the will, intention, or money to make it a reality. Thus essentially sticking with the old route (new bridge), also meaning the whole EIS	Allentown (Heights)	

process was kind of a waste of
time and money unfortunately.

ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



SCOPING PHASE

COMMENT FORM

The formal EIS scoping comment period is February 14th through March 15th, 2023

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Other ways to provide a formal comment:



Submit a comment on our project website



Email your comment to AllentownTruckReRoute@TukwilaWA.gov



Mail your comment to Mark Hafs 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188



Mailer comments must be postmarked by March 15, 2023

SHARE TOUR INPUT	JOIN OUR MAILING LIST?	YES	□ NO
NAME	EMAIL		

COMMENTS

Share your input on what issues and alternatives we should analyze in the EIS. *Example: There is a 100-year-old tree at the intersection of X and Y that should not be disturbed during the rerouting process.*

Transported into other languages.
Allentown is mostly comprised of minorities that do not speak english

Do you have questions or concerns regarding the Environmental Impact Statement (EIS) process?

What neighborhood do you live in? (Optional)





ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



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SHARE YOUR INPUT

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NO

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COMMENTS

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Example: There is a 100-year-old tree at the intersection of X and Y that should not be disturbed during the rerouting process.

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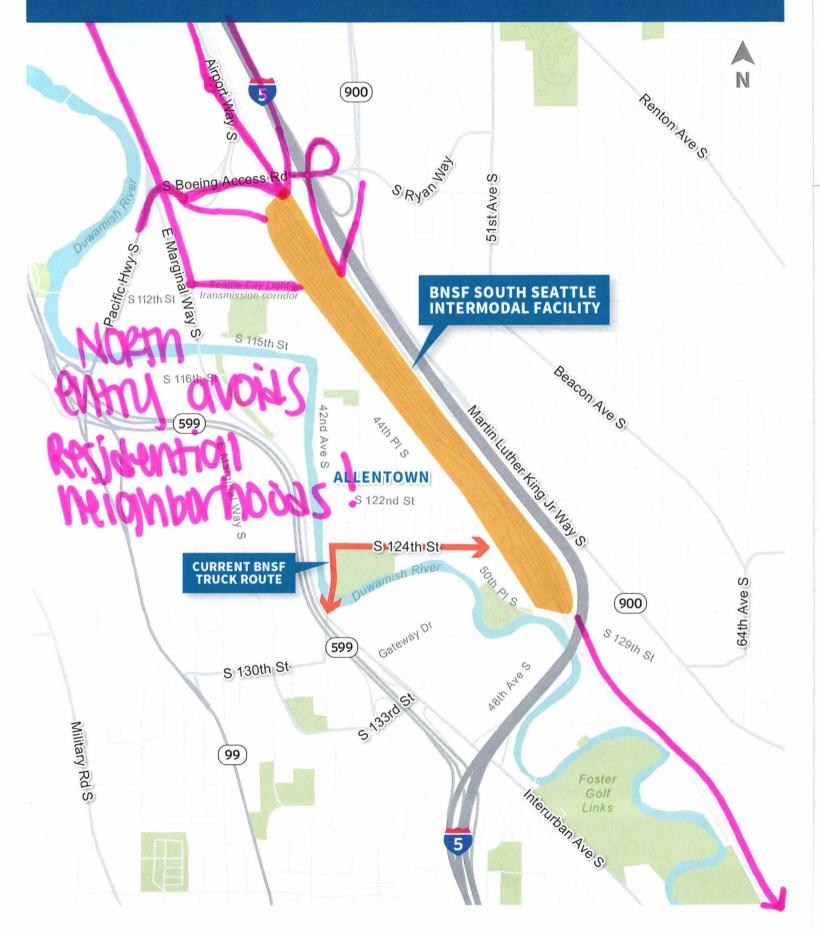
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Do you have questions or concerns regarding the Environmental Impact Statement (EIS) process?

What neighborhood do you live in? (Optional)

Allentown





ALLENTOWN TRUCK REROUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



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SHARE YOUR INPUT	JOIN OUR MAILING LIST? YES NO
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What neighborhood do you live in? (Optional)

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ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



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SHARE YOUR INPUT

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EMAIL

COMMENTS

Share your input on what issues and alternatives we should analyze in the EIS. Example: There is a 100-year-old tree at the intersection of X and Y that should not be disturbed during the rerouting process.

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THIS WILL IMPROVE THE QUALITY OF LIFE FOR THE ENTIRE
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THE TRUCKS NOT DRIVE BY OUR COMMUNITY LENTER AND PARES

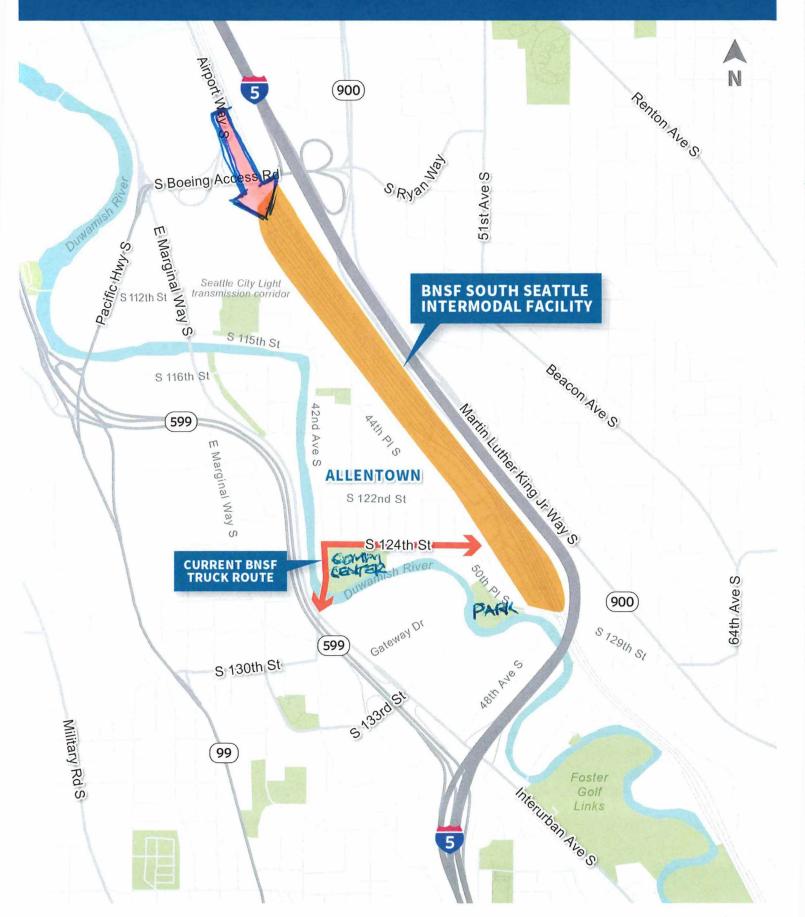
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ENVIRONMENTAL REVIEW PROCESS



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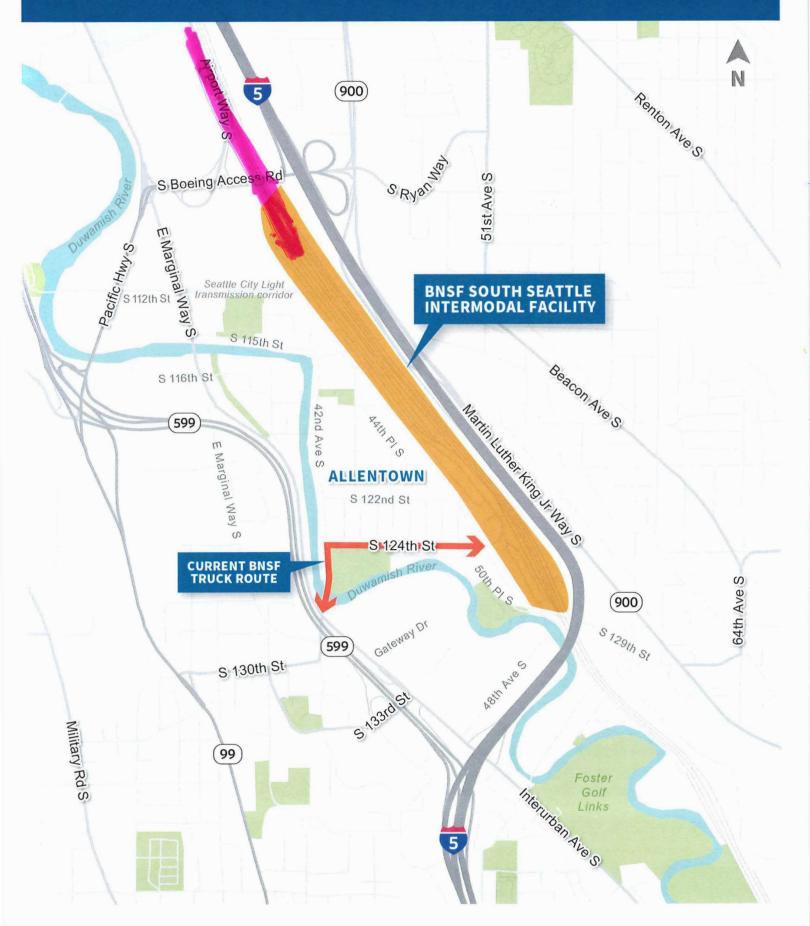
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Do you have questions or concerns regarding the Environmental Impact Statement (EIS) process?

What neighborhood do you live in? (Optional)

Allentown





ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



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YES

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COMMENTS

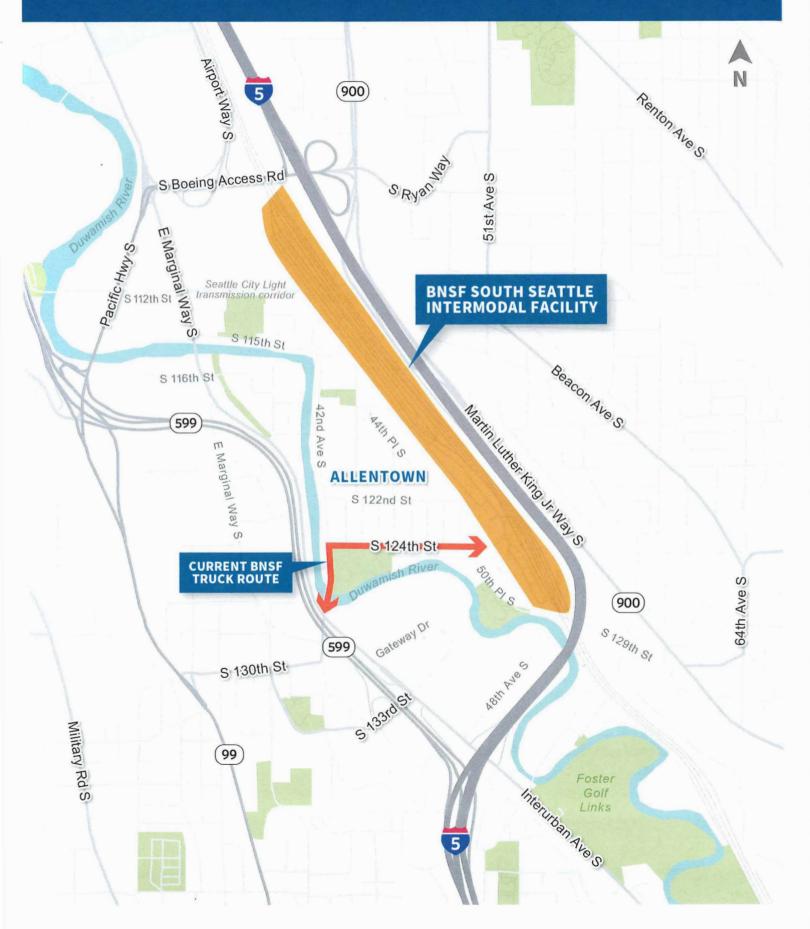
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Why are trucks using, 42nd ave S?

Do you have questions or concerns regarding the Environmental Impact Statement (EIS) process?

What neighborhood do you live in? (Optional)





ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



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What neighborhood do you live in? (Optional)

JOIN OUR MAILING LIST? ☐ YES ☐ NO





ALLENTOWN TRUCK REROUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



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DUWAMISH TRIBE

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03/09/2023 City of Tukwila Allentown Truck Reroute BNSF Intermodal Facility

Dear Mark Hafs,

Thank you for the opportunity to comment on the Allentown Truck Reroute for the BNSF Intermodal Facility.

Our Tribe has been on the Duwamish, Black, Cedar and Green Rivers since at least the Vashon Stade of the Fraser glaciation thousands of years ago. We have also been present around Lake Washington and Lake Sammamish as well as tributary streams in and around King County, Washington. Our culture and practices fostered trade and relationships between tribes in the immediate vicinity as well as in other regions of the state. Our presence helped the European Americans establish themselves in and around West Seattle, the city of Seattle and the ensuing suburbs in the central Puget Sound region. Within a decade or less of welcoming the settlers, the Duwamish were marginalized and relationships between the Duwamish and the European Americans became deadly. Places that the Duwamish and other tribes inhabited, used for resources and sacred sites, were occupied by the settlers, and stripped of their natural resources. The careful land management by the Tribe was discarded and traditional food and natural resources began to dwindle for the Duwamish and other tribes.

By 1920 engineering projects around Seattle permanently changed the landscape for the Duwamish and other tribes. The straightening of the Duwamish River eliminated the estuary and marshlands used by the Duwamish and other fish and wildlife. The Duwamish River is a salt wedge river that gradually becomes fresh water some distance up the river. This is a place where salmon can acclimatize to fresh water when they return to their spawning grounds. Without the estuary and the natural meandering of the Duwamish River, this severely reduced fish and wildlife and starved out our people. The straightening of the river also allowed for industrial transport and pollution of the water. To further allow transport for larger marine traffic, the river was dredged. The dredged sediments and the sediments from the regraded areas of Seattle created Harbor Island, a shipping container location for transport. The dredged materials were also used to fill in the estuary, covering our waterways and lookouts, and created what is now known as SODO (south of downtown). The creation of the Ballard Locks allowed for the Montlake Cut, which had been a seasonal canoe passage between Lake Washington and Lake Union by our people. These projects lowered Lake Washington which subsequently dried up the Black River to a now riparian forest. The Black River is the birthplace of the Duwamish and its chief, Chief Seattle. The Black River was home to abundant salmon and was the outlet for Lake Washington and drained into the Green/Duwamish Waterway – and at times, the Black River reversed flow during high tides and flooding.

Within a short span of time, our land, people, and resources were devastated. To preserve our ancestors' memories and our way of life, the cultural preservation department is vital to our tribe and its link to the past. The knowledge of our ancestors has been lost due to the occupation and the transformation of our waterways. To continue our existence, we need to maintain and relearn what we



DUWAMISH TRIBE

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have lost for our children. The awareness and culture of the Duwamish is not just vital to our children, but to those who now live on our occupied land. Our ways and traditions stewarded the land, conserved resources, and respected life.

Our ancestors left behind tools of their lives that are now buried within sediments a few feet underground in and around Seattle and along our river, the Duwamish. After reviewing the draft cultural resources assessment for the BNSF Intermodal facility provided by the City of Tukwila, the Duwamish Tribe would favor an alternative access route that is farthest from a known archaeological site, that does not adversely impact the environment of the Duwamish River and does not cross near our current sacred sites which include, but not limited to, the Duwamish Hill Preserve, Chinook Winds and North Winds Weir.

For all the alternatives currently listed in the BNSF draft cultural assessment from 2016, the DAAP WISAARD predictive model indicates that an archaeological survey is highly advised with a very high risk of encountering cultural resources. The Duwamish Tribe would recommend an archaeological review performed for this project if there will be any development that involves ground breaking or excavation below current fill. We would also request that any bore logs and/or a geotechnical report associated with the project is made available to us to help narrow down future comments. This is in an area the Duwamish Tribe considers culturally significant and has a high probability to have unknown archaeological deposits, especially if excavation cuts below fill.

We also request that if any archaeological work or monitoring is performed, we would like notification. Cultural and archaeological resources are non-renewable and are best discovered prior to ground disturbance. The Tribe would also like the opportunity to be present if or when an archaeologist is on site in the event that an artifact or cultural resource is encountered.

While our focus is on preserving our cultural resources, we also support and recommend the removal of invasive species and noxious weeds and replace any proposed landscaping with only native vegetation to increase habitat for native fish, wildlife, avian life and pollinators.

Thank you,

Cultural Preservation

Mark Gad





March 13, 2023

via email: AllentownTruckReRoute@TukwilaWA.gov

Allentown Truck Reroute Project

City of Tukwila

Re: Scoping comments for the EIS for the Allentown Truck Reroute Project

Dear Mr. Hafs,

On behalf of The Northwest Seaport Alliance (NWSA), we welcome the opportunity to provide scoping comments on the Allentown Truck Reroute Project.

The Northwest Seaport Alliance is a port development authority governed by the ports of Seattle and Tacoma. The NWSA unifies management of the ports' marine cargo facilities and businesses to strengthen the Puget Sound gateway and attract more marine cargo and jobs to the region. In 2017, facilities managed by the NWSA supported 58,400 jobs and \$5.8 billion in economic impact. The BNSF's South Seattle Intermodal Yard has long been an important facility in its rail network, supporting the movement of domestic cargo. This includes import cargo arriving at the Port's and NWSA's container facilities destined for the Midwest and East Coast. That cargo first moves to transload facilities in the region, where it is transferred from ocean-going 40' to domestic 53' containers before it is trucked to the South Seattle Intermodal Yard. This provides Washington exporters with empty 40' ocean-going containers that can be used to move agricultural and other products made in Washington through NWSA facilities. The railyard benefits the entire state.

The NWSA appreciates that the City of Tukwila has provided a home for this important facility for many years. We encourage the movement of cargo by rail over long distances because it is more sustainable than the movement of cargo by truck: Freight trains can carry a ton of cargo for almost 500 miles with just a single gallon of diesel. At the same, we understand that the proximity of the railyard to the Allentown neighborhood poses safety, environmental and health risks, raising equity considerations.

For these reasons, the NWSA would like to congratulate Tukwila on the restart of the effort to find a better route for trucks serving the BNSF's railyard. In reviewing prior alternatives assessment materials, we noticed that these efforts did not yet include an assessment of traffic impacts. We would like to encourage you to include a thorough analysis of the traffic impacts of the potential new routes both on trucks serving the rail yard, and on trucks that may be impacted by these routes, in the transportation element of the EIS. Travel time and reliability are important criteria for truck freight performance, with related impacts on air quality and noise.

We look forward to the results of the scoping process and the Draft EIS. Please do not hesitate to contact me at cwolf@nwseaportalliance.com or 253-888-4414 with any questions or comments.

Sincerely,

Christine Wolf, Senior Transportation Planner



Suite 3300 920 Fifth Avenue Seattle, WA 98104-1610

Clayton P. Graham 206-757-8052 tel 206-757-7052 fax

claytongraham@dwt.com

March 15, 2023

Mark Hafs 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188 AllentownTruckReRoute@TukwilaWA.gov

Via U.S. Mail and Email

Re: Comments on the Scope of the Environmental Impact Statement for the Allentown Truck Reroute Project (the "**Project**")

Dear Mr. Hafs:

This firm represents Strander Family, LLC I and Strander Family, LLC II (the "Strander Companies"), owners of six properties leased to four commercial tenants along 48th Avenue South, in matters related to the above-referenced Project. We write on the Strander Companies' behalf to submit comments on the scope of review under the State Environmental Policy Act (SEPA) being carried out by the City of Tukwila (the "City") for the Project.

The current iteration of the Project is not the City's first time considering a potential alternative location for a primary vehicular access route to the Burlington Northern Santa Fe ("BNSF") Intermodal Facility, which currently runs along 42nd Avenue South (over the existing 42nd Avenue South Bridge) and South 124th Street (the "Current Route"). Most recently, the Project was studied in 2015-2016, though the effort was ultimately tabled. See BNSF Access Study Project Update, August 10, 2015; City of Tukwila Endangered Species Act Screening Checklist (December 6, 2016) ("2016 Checklist"). Two decades prior, in the late 1990s, the City similarly studied and considered alternatives for new access to the BNSF Intermodal Facility. See City of Tukwila Transportation Committee Agenda, March 10, 1998. One alternative considered was a route along 48th Avenue South (the "48th Ave. S. Alternative"). As the Strander Companies detailed then, the 48th Ave S. Alternative was (and is) costly compared to alternatives; would significantly disrupt existing businesses; and would severely and negatively impact traffic flow to and from I-5. In response to these concerns and others, the 48th Ave. S. Alternative was removed from the City's considerations. See Tukwila City Council Meeting Minutes, September 25, 2000. While the same concerns that caused the City to abandon the 48th Ave. S. Alternative remain and more have arisen since—the City has signaled its openness to reconsidering that route as a potential alternative for the Project.

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The Strander Companies would be significantly affected by and are opposed to the 48th Ave. S. Alternative. We and our client understand and share the City's interest in creating a harmonious solution that balances safe and efficient commercial truck traffic and the peace and safety of Allentown residents. As the City reiterates in its scoping notice, "[t]he purpose and need for this project is to develop an alternative route to the BNSF Intermodal Facility in Allentown to improve livability and safety in Allentown, without compromising the operations of the intermodal facility." We do not believe that goal is served by the 48th Ave. S. Alternative, which will have significant and disproportionate impacts on the natural and built environment well beyond those caused by other viable alternatives.

While the 48th Ave. S. Alternative has been part of the Project discussion for decades, we encourage the City to take a fresh look at the environmental context and exercise its due discretion in considering only those alternatives <u>that are reasonable today</u>. See Solid Waste Alt. Proponents v. Okanogan County, 66 Wn. App. 439, 446 (1992) [hereinafter "SWAP"] (The [City] is not required to explore every conceivable alternative."); WASH. ADMIN. CODE¹ [hereinafter "WAC"] 197-11-440 (clarifying that, under SEPA's mandate to explore "reasonable alternatives," "[t]he word 'reasonable' is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative") (emphasis added). As our courts have made clear, community displeasure alone cannot be the basis for selection of alternatives. See Maranatha Mining, Inc. v. Pierce County., 59 Wn. App. 795, 804, cited in SWAP, supra. Rather, the City's selection of alternatives—and ultimately, of the Project site—should be driven by current data regarding the wide variety of appropriately considered environmental impacts, not by adherence to an outdated list of potential sites that was developed more than two decades ago.

Accordingly, we urge the City to decline to include the 48th Ave. S. Alternative in its Environmental Impact Study (**EIS**) and to focus on more viable alternatives, including the Current Route.² For the reasons outlined below, the 48th Ave. S Alternative should be excluded from the City's ongoing SEPA review of the Project.

I. SCOPING

The Determination of Significance/Scoping Notice for the Project, issued by the City on February 14, 2023, states that an EIS will be prepared for the Project. Given its scale and geographic context, we agree that the Project is likely to have significant impacts on various aspects of the built and natural environment, which will be heightened or decreased depending on the alternative chosen. We encourage the City to take a hard look at the breadth of these impacts in choosing alternatives

¹ The chapter of the Tukwila Municipal Code that contains the City's SEPA regulations requires that "[t]he SEPA rules contained in WAC Chapter 197-11 must be used in conjunction with this chapter." TUKWILA MUNI. CODE Sec. 21.04.010(B).

² See WAC 197-11-440(5)(b)(ii) ("The 'no-action' alternative shall be evaluated and compared to other alternatives.")

and evaluating the Project. Because "scoping is intended to identify and narrow the EIS to the significant issues[,]" we particularly urge analysis of the following:

A. Duwamish River Water and Habitat Impacts.

The presence of the Duwamish River in the Project area should factor heavily into the City's evaluation of the Project alternatives and their relative impacts. Any proposal that involves construction of a <u>new</u> bridge across the Duwamish River—rather than a non-river route or use of an existing bridge—is likely to significantly and negatively impact the river. Construction and the placement of permanent support structures will impact the river banks. Road runoff from cars and trucks crossing the new bridge will impact water quality, in turn affecting the plants and animals therein, including endangered salmonoid species. The increased traffic over a previously undisturbed section of the river will ultimately impact fish migration. Any such impacts to fish habitat and access may also constitute a violation of tribal treaty rights.

B. Traffic.

The 2015 BNSF Access Study SEPA Checklist suggested the Project in its then-current iteration would cause no significant traffic impacts because there would be no net change in the number of vehicle trips that would occur in light of a reroute of existing traffic. However, there *will* be significant impacts to the flow of traffic throughout the Project area depending on the alternative chosen, impacts that we encourage the City to fully evaluate. The impact of the addition of a significant amount of truck traffic to existing traffic along the alternative routes must be considered, including the impacts to businesses and residences along those routes.

C. Current Route Updates Since Previous Study.

Since the City's previous studies of the Project in the late 1990s and 2015-2017, the City has recently and independently approved replacement of the 42nd Ave. S. Bridge, which is part of the Current Route. Therefore, many of the assumptions of environmental and economic impacts identified in previous studies must be reevaluated, in light of the separate 42nd Ave. S. Bridge replacement *already underway*. For example, the 2017 Alternative Screening assumes replacement of the 42nd Ave. S. Bridge would be a required component of the Current Route. Because the replacement of the 42nd Ave. S. Bridge and related traffic improvements already are occurring independently, any associated environmental impacts should not be included in an assessment of the environmental impact of the Current Route alternative under this EIS.

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³ WAC 197-11-793.

D. Loss of Commercial Lands.

Several of the alternatives identified in previous study, including the 48th Ave. S. Alternative, would cause significant loss of important industrial and commercial lands in the City. The proposed conversion of commercial and industrial lands ought to be thoroughly analyzed in the EIS because such losses will affect the long-term economic prospects of the City and its residents. Relatedly, the Strander Companies urge the City to realistically and accurately analyze the costs associated with acquiring private property necessary for each of the alternatives, including appropriate compensation that may be required in the taking of any private land for the Project.⁴

E. Alternatives Analysis.

An EIS must focus on a project's "probable significant adverse impacts and <u>reasonable alternatives</u>[.]" WAC 197-11-408(1) (emphasis added). A "reasonable alternative" is "an action that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." WAC 197-11-786 (emphasis added). As has been the case for the nearly three decades during which the City has considered some iteration of the Project, the 48th Ave. S. Alternative is not a reasonable alternative given its significant environmental impacts, as described below. Accordingly, the Strander Companies encourage the City not to include the 48th Ave. S. Alternative in the EIS, and instead focus on reasonable alternatives that do not involve such significant construction, costs, environmental impacts, and private property takings.

II. THE 48TH AVE. S. ALTERNATIVE IS NOT A REASONABLE ALTERNATIVE.

A. Air Quality.

The 48th Ave. S. Alternative would involve the construction of a new bridge spanning the Duwamish River, located only approximately 350 feet north of the existing I-5 bridge. So much car and truck traffic concentrated in such a small area, especially one crossing a river, is likely to lead to significant air (and water) pollution concentrations. Those cumulative effects would be avoided through adoption of *any of the other alternatives already under consideration, or new alternatives* that don't involve additional construction so close to the interstate.

B. Water Quality.

As explained in Section I(A) of this Comment, the construction of a new bridge will significantly impact the water quality of the Duwamish River by causing runoff from the new roadway and

⁴ See Kucera v. State Dep't of Transp., 140 Wn.2d 200, 224 (2000) (en banc) ("[SEPA] does not require that those evaluating a proposed action consider environmental factors alone. Rather, the essential factors balanced frequently are the substantiality and likelihood of environmental cost and economic cost.").

other water impacts. These water quality impacts are significantly greater for the alternatives that require construction of a new bridge over the Duwamish River than for the Current Route and alternatives that do not require construction of new river crossings. Moreover, like air pollution, the water quality effects of placing two highly trafficked bridges only 350 feet apart must be considered.

C. Animals, Specifically Endangered Species.

Relatedly, the inevitable and detrimental impacts to the Duwamish River that the 48th Ave. S. Alternative would cause would directly impact the fish species therein. The 2017 BNSF Intermodal Facility Access Study identified the presence of Chinook salmon, steelhead trout, and bull trout in the Duwamish River, all of which are identified as "threatened" under the Endangered Species Act. David Evans and Associates, BNSF Study, April 17, 2017. Building a new bridge across the River would unnecessarily harm these threatened species. In particular, as explained by the Muckleshoot Tribe in 2000, any alternative that involves construction of a new bridge over the Duwamish River will have problematic direct and indirect impacts upon Chinook salmon's spawning and migration routes. Letter from Tribal Attorney K. Allston to K. Adams Pratt, dated April 14, 2000 ("Muckleshoot 2000 Letter") (attached). Since that time, the fragility and health of our native salmon populations has only become more dire. Road runoff from chemicals in tires (specifically, 6PPD-quinone) are directly responsible for the death of coho salmon in the area. Construction of a new bridge would increase turbidity in the River and unnecessarily increase shade over the River, further harming habitat. 2016 Checklist at 5.

In addition, a new bridge would increase public access over the River, which may impede or delay upstream Chinook salmon migration, increasing the level of stress experienced by the salmon and increasing pre-spawn mortality. Muckleshoot 2000 Letter at 2.

Finally, not only would a new bridge harm the fish directly, but it would violate the Muckleshoot Tribe's federally protected treaty rights to access its usual and accustomed fishing areas and right to take fish from these areas. *Id.* at 3. The proposed 48th Ave. S. bridge is the location of such historic treaty fishing, and impairment of these treaty fishing rights is unlawful. *Id.*

D. Shoreline, Recreation, and Land Use

The Duwamish River is a shoreline of statewide significance, within the City of Tukwila's Shoreline Overlay District. *See* Tukwila Shoreline Master Program at 2 (Mar. 2, 2020). Therefore, selecting any alternative involving construction of a new bridge across the Duwamish River, including the 48th Ave. S. Alternative, would significantly and unnecessarily impact a portion of

⁵ See Z. Tian et al., <u>A Ubiquitous Tire Rubber–Derived Chemical Induces Acute Mortality in Coho Salmon</u>, 371 SCI. 185 (2020).

City of Tukwila – Allentown Truck Reroute Project March 15, 2023 Page 6

shoreline land. In addition, construction of the bridge would require significant land disturbing activities in Critical Areas regulated under Tukwila Municipal Code 18.45.030.

Relatedly, the 48th Ave. S. Alternative would interfere with the existing Green River Trail, one of the longest continuous regional trails in the Puget Sound region. The Green River Trail runs along the western portion of the Duwamish River and would be interrupted or need significant modification to accommodate a new bridge along 48th Ave. S. Construction of a 48th Ave S. bridge would also require removal of the several public parking stalls located on the west side of the river, which are used for access to the Green River Trail. These unnecessary modifications to the Green River Trail would appear to conflict with the City's Comprehensive Plan Parks, Recreation and Open Space goals. *See* Tukwila Comprehensive Plan, Policy 6.1.5 ("Increase physical and scenic connectivity with the Green/Duwamish River."); Policy 6.2.1 (encouraging "[p]reservation of and public access to community landmarks that help make up the City's identity, including the river and historic sites").

The 48th Ave. S. Alternative would also require the acquisition of a significant portion of fully developed private property. While 48th Ave. S. spans a relatively short distance, it is home to numerous businesses including several gas stations, a hotel, a construction equipment supplier, and a truck rental company. We understand that the 48th Ave. S. Alternative would involve the widening of the road, so as to physically impact the existing businesses. The cost of doing so—including providing appropriate compensation for any such takings—will be significant, especially in comparison to the other proposed alternatives with fewer existing improvements at risk.

E. Historic and Cultural Preservation

As discussed in the attached Muckleshoot 2000 Letter, the development of a new bridge at 48th Ave. S. over the Duwamish River would directly and illegally violate the Muckleshoot Tribe's federally protected treaty fishing rights. *See United States v. Washington*, 694 F.2d 1374, 1381 n.15 ("The State's obligation to take reasonable steps to preserve and enhance the fishery applies to the grant of State permits as well as to the State's own projects."); *Muckleshoot Indian Tribe v. Hall*, 696 F. Supp. 1504, 1510 (W.D.WA 1988) ("The right to take fish at all usual and accustomed fishing places may not be abrogated without specific and express Congressional authority."). The City is required to consider the legality of the Project in reviewing the significance of its impacts under SEPA. *See, e.g.*, WAC 197-11-330(3)(e)(iii). Given the potential for the invasion of the

⁶ The Muckleshoot Tribe has federally protected rights to access its usual and accustomed fishing areas under the Treaty of Point Elliott. 12 Stat. 927 (1855); *United States v. Washington*, 384 F. Supp. 312, 365-66 (W.D.WA 1974). Article 5 of the Treaty of Point Elliott secures the Muckleshoot Tribe's "right of taking fish at usual and accustomed fishing grounds and stations." "Because the right of each treaty tribe to take anadromous fish arises from a treaty with the United States, that right is reserved and protected under the supreme law of the land, does not depend on state law, is distinct from rights or privileges held by others, and may not be qualified by any action of the state." *United States v. Washington*, 384 F. Supp. 312, 402 (W.D.WA 1974).

City of Tukwila – Allentown Truck Reroute Project March 15, 2023 Page 7

Tribe's treaty rights, the 48th Ave. S. Alternative cannot be considered a "reasonable alternative" for the Project.

F. Traffic and Arterial System Impacts

For all options except the Current Route, the traffic impacts would be significant and must be a central consideration. The 48th Ave. S. Alternative would be particularly problematic. Trucks traveling south along I-5 to the BNSF Intermodal Facility would exit I-5 at exit 156 on a short off-ramp, turn right onto Interurban Avenue S. then almost immediately right again onto 48th Ave. S. This will predictably create a traffic backup not only for trucks and other vehicles turning onto 48th Ave. S. but also for any cars getting off at exit 156 and attempting to travel elsewhere along Interurban S.

Moreover, <u>unlike each of the other identified alternatives</u>, 48th Ave. S. is not a designated arterial.⁷ Accordingly, routing trucks along 48th Ave. S. would either violate or require revision to the Tukwila Municipal Code's functional arterial system.

G. Impacts to the Built Environment

The 48th Ave. S. Alternative would have significant impacts on existing businesses and infrastructure in the area, which previous SEPA review of the Project has underestimated and downplayed. For example, the 2016 SEPA Checklist concedes that "[g]uests at the Days Inn could experience intermittently higher noise levels" from the truck traffic. 2016 Checklist at 14. Such noise impacts would be detrimental to the Days Inn's business, as increased truck traffic noise outside a hotel would inevitably and significantly decrease demand of the hotel. In addition, the 48th Ave. S. Alternative, unlike the other alternatives, would require the City's acquisition of at least 25,000 square feet of private property, the cost of which was not adequately addressed in prior study, and has only increased in the time since last considered.

III. CONCLUSION

We appreciate the City's serious consideration of the potential environmental impacts of the Project as it completes scoping and selects appropriate alternatives for study. As is evident from past study and the concerns and impacts discussed herein and in other comments, the Project will result in significant adverse environmental impacts to many elements and sub-elements of the natural and built environments. We have laid out several of the impacts we understand to be of most concern at this early juncture but trust the City will conduct a full and appropriate analysis of all elements, taking into account changes in conditions since previous studies of the Project

⁷ See TMC 9.18.030(4) (designating 42nd Ave. S. as a "collector arterial"); TMC 9.18.030(2) (designating S. 112th Street as a "collector arterial"); TMC 9.18.020(B)(1) (designating Airport Way South as a "minor arterial"); TMC 9.18.040(6) (designating Gateway Drive as a "conceptual arterial").

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were conducted. In so doing, we believe it will be clear that the 48th Ave. S. Alternative is unreasonable, disproportionately harmful to the environment, and should not be included in the Project EIS.

Thank you for your consideration of these comments.

Very truly yours,

Davis Wright Tremaine LLP

Clayton P. Graham

cc: Louise Strander

Megan Raymond



ATTORNEYS

Curran Mendoza P.S.

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Kent, Washington 98035-0140

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Facsimile (253) 852-2030 * (253) 859-8037

August 25, 1998

HAND DELIVERED

Transportation Committee City of Tukwila Tukwila, Washington 98188

Re:

48th Ave. SE project

Dear Committee Members:

Our firm represents Ms. Louise Strander and her family regarding the City's relocation of Burlington Northern (BN) truck traffic onto 48th Avenue Southeast (48th). It appears you have received and are acting upon seriously flawed information, and you are missing important information, all of which is leading you towards incorrectly adopting 48th as supposedly the best alternative for alleviating the BN truck noise from the Allentown area.

The purpose of this letter is to point out the flaws in the information you are using, and address information you are apparently not considering, in the hopes that you will reconsider which is the best alternative. We want to show you that 48th is not the best, nor even the logical choice for handling the BN truck issue. Ms. Strander wants to avoid having to officially challenge the City on this matter, and this letter is submitted in a good faith effort to handle these matters without resort to other measures.

You, or rather the City's studies have stated that the following reasons support 48th as the appropriate choice among the alternatives considered so far:

- 48th is the cheapest solution or alternative;
- 2. it is the least disruptive to businesses;
- 3. it does not require large or expensive property acquisition;
- 4. it is closest to a major freeway; and
- it is best for BN.

There are serious flaws with the information and analysis leading to the above reasons. Please consider the following information, which shows the above reasons are incorrect.

A Professional Service Corporation combining Curran, Kleweno & Johnson, P.S. and Cromwell, Mendoza & Belut, P.S.

1. 48th is not the cheapest overall solution/alternative:

The figures given to the Committee in the studies show that the East Marginal Way alternative would cost \$8,987,691.00, the Gateway alternative would cost \$6,785,981.00, and the 48th alternative would cost \$2,838,608.00. The problem is that these figures do not accurately compare because of the "apples and oranges" approach used in arriving at those figures.

The East Marginal Way alternative is greatly inflated because it includes an estimated \$3,380,000.00 that BN has stated it will need to alter its facility. This "cost" is omitted as a factor in the 48th alternative, even though alterations will still be needed for BN if the 48th alternative is used. The omission seems intentional, in light of the size of the figure for BN's alterations and the obvious need for such alterations regardless of which alternative is used. The point is that the bottom line figures in the Harding Lawson study (the "study") have been artificially inflated, resulting in misleading and incorrect information because you are dealing with figures based on different (sometimes omitted) factors.

Another category of costs within the study which is flawed regards the costs of traffic impact for the three (3) alternatives. The most severe traffic impact out of all the alternatives occurs at 48th and Interurban Avenue. The City's study indicates: "Excessive queues and long delays would occur ... for westbound traffic on 48th at the approach to Interurban Avenue. These queues would also interfere with driveway access for the adjacent mini mart/filling stations." "The increased traffic volumes ... on 48th as alternative access for the Hub Center would also increase traffic frictions and delays at the other driveways on those streets." "The increased traffic turning volumes at the South 129th Street/South 130th Place intersection under the 48th alternative will increase traffic delay and hazard at that severely skewed intersection, even with some improvement in the intersection geometry."

In addressing severity of these traffic impacts, the study considered potential mitigating roadway and traffic control measures such as providing additional lanes on 48th, a second left-turn lane for movement from Southbound Interurban Avenue onto Eastbound 48th, and a revision in the southbound I-5 off-ramp channelization lane designations. It is clear from the study that some and most likely all of these mitigation measures will have to be implemented to address the severe traffic impact of the 48th alternative. However, no money for such mitigation is figured into the costs presented to you for the 48th alternative. Showing even further the unbalanced way in which factors were applied

for the alternatives, \$100,000.00 was added for a traffic signal to the costs for the East Marginal Way alternative. Because nothing is shown for traffic mitigation costs for the 48th alternative, the figures for 48th are grossly underreported.

Yet another area where the cost figures used by the study are critically flawed is found in the amount of condemnation costs for the 48th alternative. The study estimates these costs as \$7,600.00. This is grossly underestimated. Consider the condemnation and inverse condemnation costs of taking property along the south side of 48th. This will be tremendously expensive for the City. The study apparently considers only a per square foot cost of the real property that would be taken by the City. The study does admit that the 48th alternative will impact the BP station and access to the Penske yard, but utterly fails to consider the costs of the impact in the bottom line figures. Even worse, and more expensive, the study fails to recognize and consider the very severe impact and large costs to Hertz, Denny's, and the Silver Cloud Motel. Washington case law is clear that in this situation, the City, as the condemning authority, will bear the costs of mitigating impact, not the owner or users of the property. Those costs will be extremely large because of the devastating impact such condemnation will have on those business and properties.

Please note that you apparently take into consideration all costs to BN, and even make that a key factor in choosing a sight, but you are not giving any consideration to the very great costs the City will incur to the owner/businesses on the south side of 48th.

2. Disruption to Businesses:

The traffic impact of the 48th alternative on the BP station will be devastating to that business. It will likely result in closure of that business. Condemnation on the south side of 48th will render the Penske truck bays virtually unusable. The City's condemnation costs will include relocation on that site and construction of new truck bays, as well as reconfiguration of the Penske operation to accommodate the forced relocation. The same is true for Hertz' facilities and operations. The Hertz building/facilities are located very close to the existing right of way. The large equipment that must be maneuvered through that facility will no longer be able to do so if any condemnation occurs by the City. Accordingly, there will be relocation, reconstruction and reconfiguration costs payable to Hertz, along with condemnation value to pay to the owner of that property.

Note that costs of building demolition were included in the figures for both the Gateway

and East Marginal Way alternative, but completely omitted from the 48th alternative.

The information, factors and figures omitted in the study regarding the 48th alternative begin to look peculiar. How could the study miss so many obvious issues and costs, especially when they are considered in the other alternatives for other matters?

Note Denny's very close location to the existing right of way. The costs of mitigating noise and access impacts will have to be borne by the City. The impact of noise will most adversely effect the Silver Cloud Motel. Consider the obvious incompatibility of the motel use with the truck traffic which has peak hours during 1:00 a.m to 3:00 a.m. Yet not even minimum noise abatement costs are considered in the study. The noise impact on the Silver Cloud Motel will be ruinous. Not only that, the entrance and the fire lane there will be completely eliminated from condemnation along the south side side of 48th.

3. Property acquisition and impactexpenses will be very high:

It is obvious that the \$7,600.00 included in the study for condemnation costs is woefully inadequate. That figure overlooks very large impact costs the City will have to bear with both the landusers and owner along the south side of 48th. That figure will not even begin to cover the City's litigation expenses which will arise during the condemnation process.

These impact costs regarding the businesses and owner of the property involved on 48th are <u>not</u> included in the bottom line figures for the 48th alternative. Any attempt to mitigate these costs by a suggested crossover road from Gateway will do nothing to decrease these business/property impacts and costs.

The conclusion that the 48th alternative is the least disruptive to business and does not require large property acquisitions is incorrect. It is one of the most business disruptive of all the alternatives. Although the land to condemn along 48th may be small in amount, the costs, which will include mitigation measures, reconstruction and reconfiguration of business facilities, will be the highest for the City.

4. 48th being closest to I-5 is not a benefit:

The belief that the 48th alternative is a good one because it is close to the freeway is fundementally flawed. The study itself points out that precursory traffic impact studies show that 48th is actually too close to I-5, which causes severe traffic impact.

5. Best for BN?

You have publicly acknowledged that the East Marginal Way alternative is the cheapest for the citizens of Tukwila, yet it was decided to not pursue that alternative. Instead, the City is apparently willing to spend millions of dollars so that BN does not have to do so.

Our experts confirm, after reviewing the study, and examining the site and surroundings, that the City will end up spending perhaps millions more that has been publicly admitted by the City or shown in the study.

Aside from the costs of pursuing the 48th alternative for the benefit of BN, Washington law prohibits condemnation for a private purpose. Washington courts are very clear that a condemning authority will not get past the first step of a condemnation action, which requires a showing of public use and necessity, if the true purpose behind the condemnation is private rather than public.

Based on the above information, which shows the three alternatives do not use the same factors or considerations for arriving at the figures shown, the reasons of the City for choosing the 48th alternative are not supported by the real facts or figures, unless the City is simply choosing it because that is what is wanted by BN.

Failure to comply with SEPA requirements:

The City has taken "action" and has clearly chosen 48th as its choice of the alternatives. However, no SEPA review has been submitted or started. Compliance with SEPA review procedures is past due, yet the environmental impacts remain to be addressed by the City.

Lack of notices:

Our client is very disturbed by the nature, timing and lack of notice of any committee meetings or hearings on this matter. It appears that public hearings on this project have been carefully selected for favorable target groups so that only biased information is being received by you. Our client is going to be severely impacted by the City's choice of 48th, yet she has not been notified of hearings on this subject. She found out about one (1) information session only by chance.

Conclusion/request:

Given the flaws in the information and lack of complete information provided to you, we respectfully request that you revisit and reconsider the decision to pursue the 48th alternative. You should demand, receive, and use complete facts and figures information before committing to spend millions of dollars pursuing the 48th design. It is fair and appropriate to expect this from you. After all, Ms. Strander is a long-time citizen of Tukwila, and City decisions which will prove very harmful to citizens should be carefully and fully scrutinized before being implemented.

Please understand that any condemnation or inverse concdemnation actions by the City on the south side of 48th will be vigorously contested on every possible legal basis. Ms. Strander has no choice. Such condemnations will ruin some of the businesses there and seriously harm the others.

Nothing herein may be construed as a waiver, limitation or release of any legal remedies, claims or rights, and all rights and remedies, at law and in equity, are expressly reserved.

Thank you for your time and consideration. We request a formal response at earliest convenience.

Sincerely,

CC:

CURRAN MENDOZA, P.S.

Grogery 1: Groniman

Ms. Louise M. Strander



MUCKLESHOOT INDIAN TRIBE

OFFICE OF THE TRIBAL ATTORNEY

39015 - 172ND Avenue S.E. • Auburn, Washington 98092-9763 Phone: (253) 939-3311 • FAX: (253) 931-8570



APR 1 7 2003 AM PM 718191011111211213141516

April 14, 2000

1

Kim Adams Pratt Curran Mendoza P.S. 555 West Smith Street P.O. Box 140 Kent, WA 98035- 0140

BY FACSIMILE AND U.S. MAIL

Dear Ms. Pratt:

The Muckleshoot Tribe understands that you represent property owners in the City of Tukwila in regard to the City's desire to reroute Burlington Northern Sante Fe ("BNSF") truck traffic. The Muckleshoot Indian Tribe's Fisheries Department ("MITFD") has reviewed the City of Tukwila's proposals to improve road access for trucks utilizing the BNSF railyard located in Tukwila next to the Duwamish River. Three of the proposals involve the construction of a new bridge over the Duwamish River just downstream of the I-5 crossing of the Duwamish River. The Gateway options involve bridge construction over an area known as Codiga Farm. The 48th Avenue alternative would occur several hundred yards upstream. Bridge construction at either site will have direct and indirect impacts upon chinook salmon, the impacts varying with the alternative selected. Therefore, alternatives that do not require the construction of a bridge are available and the bridge alternatives should be excluded from further consideration.

Environmental Background

The area is tidally influenced and some mud and sandflats are located within the river channel. The salt water wedge extends through and upstream of the site during the low flow season at low tide. During high tide, the salt wedge can reach the project area after May, a time period when juvenile chinook are known to be rearing in the Duwamish Estuary. Juvenile chinook migrate downstream until they reach the leading edge of the saltwater wedge. Upon reaching the saltwater wedge, the juvenile chinook began acclimation to salt water. As the upstream extent of the saltwater wedge moves with the tides and freshwater inflows, juvenile chinook move with the wedge, but as they acclimate to saltwater exhibit a net downstream movement. Thus, the project location is located at the upper edge of where juvenile chinook begin adapting to saltwater. Adult chinook also pass through this area to reach the upstream spawning grounds.

(Strander, Zitnik, briffinh & Morrow)

Kim Adams Pratt April 14, 2000 Page 2

Project Impacts

Gateway Drive and Gateway Drive (B)

Direct Impacts

The alternative involves construction a new bridge which will cross the Duwamish River and Codiga Farms. The narrative description states that the bridge span is designed to keep the abutments out of the river during flooding events, but that the center pier will be submerged at flood stage and will cause a minor backwater effect. However, the flood event mentioned is not described. Thus, I am unsure if it is a 1 year flood event or a hundred year flood event. The smaller the flood event, the greater the potential physical impact to juvenile salmon rearing habitat by physical displacement of sandflat, mudflat, or riparian area. Additionally, the river is intertidal in this reach. The bridge will shade the intertidal area and depending upon the extent of shading may reduce the primary production in the shaded area. Juvenile chinook feed upon organisms dependent upon primary productivity. Thus, it is possible this project may result in a minor reduction of food production for chinook. Given that there has been a 98% loss in the intertidal wetlands contributing to this food chain, further reductions could pose a problem.

The proposed new bridge will include paths for pedestrians and bicyclists. This will increase public access over this part of the River. The River is expected to be warm during the upstream migration of adult chinook, temperatures exceeding preferred limits, and indeed, the NMFS Properly Functioning Conditions ("PFC"). Based upon MITFD observations of upstream coho migration in the Sammamish River, it is possible that people standing on the bridge to observe the upstream migration of adult chinook may impede or delay the upstream chinook migration. Delays of upstream migration in stream reaches with elevated temperatures will increase the level of stress upon chinook and increase pre-spawn mortality.

Indirect Impacts

The two Gateway alternatives will pass over an area known as Codiga Farm. This site is under consideration for use as a major restoration project in the Duwamish Estuary. The bridge spans will pass over this site. Thus, the bridge will shade the planted riparian and intertidal vegetation. Additionally, the presence of a bridge will preclude the planting of trees under the bridge due to maintenance and safety concerns.

48th Ave

Direct Impacts

The same direct impacts as previous described are likely to occur, though some will be less in magnitude for the following reasons:

Kim Adams Pratt April 14, 2000 Page 3

- (1) the site appears to be several hundred yards upstream and thus the influence of salt water during the chinook juvenile outmigration period is less;
- (2) the river channel is narrower and thus shading impacts cover a less area.

Treaty Fishing Rights

The Tribe has federally-protected rights to access to its usual and accustomed fishing areas, as well as a right to take fish from these areas. <u>U.S. v. Washington</u>, 384 F. Supp. 312 (W.D. Wash. 1974); <u>U.S. v. State of Oregon</u>, 718 F.2d 299, 303-4 (9th Cir. 1983). Treaty fishing occurs at the site at which the bridges are proposed and would be impacted by bridge construction. Impairment of access to treaty fishing rights is unlawful and constitutes an unacceptable consequence of the proposed project. Protection of the Tribe's reserved treaty rights is paramount. Case law reinforces this position and obligates federal agencies to protect treaty fishing rights by denying permits for projects that impact a tribe's right to access. <u>See</u>, <u>Muckleshoot Indian Tribe v. Hall</u>, 698 F. Supp. 1504 (W.D. Wash. 1988); <u>Northwest Sea Farms</u>, <u>Inc. v. United States Army Corps of Engineers</u>, WL 387756 (W.D. Wash. 1996). Accordingly, the Tribe would oppose any applications for federal permits required for this proposed project.

The Tribe has successfully opposed projects in the past that impact its treaty fishing rights. The Tribe urges the Task Force to consider other alternatives than construction of a bridge over the Green River in order to avoid formal opposition by the Tribe in the future. Please contact me if you have any questions or need further information.

Karen Allston

Tribal Attorney

Allentown Resident Public Comments for EIS

February 28, 2023

Over 35 years ago, the Burlington Northern Rail redirected truck traffic to our residential neighborhood supposedly on a temporary basis. We have been trying to reroute the truck traffic every since.

The last traffic count in 2018 cited 3000 trucks a day going through our neighborhood 50 feet from a community center where there are ball fields, a water park, picnic area, playgrounds and residential homes. Whether the count is 3000 or 300 it is still too many trucks going through a residential neighborhood.

This community now has over 40% of the people who live here born in another country. They have been and are being taken advantage of because their voices can not be heard.

6PPD which is used to keep **tires** from breaking down too quickly acts with the ozone in the environment and transforms into multiple chemicals, including 6PPD-quinonem which is responsible for killing salmon. I expect this to be researched for potential impacts to the community, wildlife and river.

Many other chemicals related to tire wear have been found to be toxic to humans and wildlife. Air Pollution from tire wear particles can be **2,000 times worse** than what comes out of a car's exhaust. I expect this to be researched for potential impacts to the community, wildlife and the Duwamish River.

During their lifetimes, **truck tires** produce 8 x more particles because of their size. **Tires** wear quicker on local residential roads than they do on freeways and highways. I expect this to be researched for potential impact.

The Duwamish River runs through Allentown. I expect the EIS to research the potential impacts of tire particles from **exhaust** being left behind which are **extremely toxic to salmon**.

I expect the EIS to research the PAH chemicals in truck **exhaust** that fall onto streets, roofs, storm sewers and directly into the Duwamish River. They have been found to be in diesel emissions at truck stops and terminals. They have been observed in soils a truck stops. PAH's major contributors to carcinogenic properties in diesel exhaust. Can be transported by air water and the soles of shoes. Some can readily evaporate into the air from soil or surface waters. Most do not dissolve easily in water. They stick to solid particles and settle to the bottoms of rivers and lakes. The PAH levels can be much higher in plants and animals than of soil or water in which they live. PAH chemicals have been previously shown to be associated with adverse health effects resulting from both short term and long term exposure. In addition to skin exposure, a potential exposure is via inhalation. Research has suggested that potential long term exposure to PAH's include disease such as **increased risk of skin**, **lung**, **bladder and gastrointestinal cancer**. (Armstrong et al., 2004; Olson et al., 2010; Diggs et al., 2011 Boffetta et al., 1997) The more research I do the scarier it gets!!! How is all this air and water pollution being documented and analyzed?

Why is BNSF not required to test for 6PPD in their storm water? Certainly if they were to move their operations whomever they sold to would be required to adhere to today's standards and permitting and not those of late 1960's.!! What BNSF is getting away with is unacceptable.

The noise is intolerable with the constant truck traffic. They are always ignoring the no truck signs on 115th that turns into 42nd Ave. S heading south and consequently the truck weight can damage the river banks and the water main that runs along that route.

Both of our important infrastructures are severely damaged due to truck traffic. (the 42nd Ave. S. Bridge and the freeway overpass on 129th going up to Skyway)

The last study in 2015 found the 48th Ave. S. off of Interurban Ave. S. option the best alternative. The entire street is commercial and dedicated to truck activity. It has two diesel fueling businesses, a motel that has 18 parking spots dedicated to semi trucks, two freight yards, a truck rental business, truck sales dealer, and a ditch witch business on this street. This street ends at the river. A bridge at this location would connect the south end of the yard. A bridge at this location would be approximately one hundred feet shorter across the river than the span across the river on the 42nd Ave. Street bridge.

The north end of the BNSF yard is commercial as well. There is an old road on the west end of the BNSF property and a gate at very north end of their property off of Airport Way S. This option is very close to Interstate 5 as well.

It is important to for the EIS to have a full understanding of the decades long issue with these trucks we have had to deal with in our neighborhood. You should know how many studies we have gone through already and what that research determined was the best alternate routes. Tour the area more than once to fully understand the issue.

This issue affects the quality of life of an entire residential neighborhood. Our health, our children's health, our safety, the killing of salmon, (thirty years ago the river was full of fisherman actually catching multitudes of salmon here in Allentown) damage to river water, air quality, and chemicals that run off into the storm sewers and soil.

I would be happy with the trucks being rerouted at either the north end of the yard in the commercial area close to the freeway **or** on 48th Ave. S in another commercial area close to the freeway **as long as the trucks are out of our residential neighborhood. Enough is enough!!!**

Sent: Sunday, February 19, 2023 12:23 PM
To: AllentownTruckReRoute@tukwilawa.gov

Subject: Semi trucks

Categories: Allentown

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

As I drive on Boeing Access Road, there are two road ways in &out, of BNRailyards that the semi trucks, should use to access & depart the, BN rail yards instead of them, driving on 42nd Ave S. Robert Boling resident

Sent from my iPhone

Sent: Monday, February 20, 2023 2:10 PM **To:** AllentownTruckReRoute@tukwilawa.gov

Subject: Truck reroute

Categories: Allentown

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

This is my opinion on the reroute. I feel that the best route would be a ramp up to Airport Access Road and or I-5. If you have to put it on the road where Harley and Denny's used to be I think it would disrupt the hotel and other businesses with traffic unless you build a completely separate road and ramps to I-5. I've lived in Tukwila since 1978; the trucks shouldn't be going through neighborhoods and they should get an easier route to access the freeways.

Thanks

Sent from my iPhone

Sent: Tuesday, January 31, 2023 9:27 AM **To:** AllentownTruckReRoute@TukwilaWA.gov

Subject: EIS Scoping

Categories: Allentown

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I understand that Mark Hass will be handing the EIS study. It is very important that Baker Commodities is included when evaluating where bridge would be placed. Potential bridge placement on 48th Ave S is our biggest concern on how it would affect or accommodate our equipment coming in and out of our plant 24 hours a day

Division General Manager



Baker Commodities, Inc.

Recycling for Life®

Baker Commodities Inc.
Seattle Division
PO Box 58368
Seattle, WA 98138
206 243 7387
1 800 562 5058
<a href="http://www.bakercommodities.com

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To: <u>allentowntruckreroute@tukwilawa.qov</u>

Subject: Allentown Truck ReRoute Project

Date: Wednesday, March 15, 2023 5:19:40 PM

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To Whom It May Concern:

I support any re-routing proposal which will remove heavy truck traffic to and from the BN from the Allentown neighborhood streets without just rerouting the same traffic through another residential area where it would cause the same problems or shaken hopes, cracked walls and foundations, noise pollution, exhaust fumes, etc..

The rerouted traffic should also avoid any sensitive environmental areas such as river banks and wetlands except for the immediate vicinity of any new bridge which may need to be constructed.

The location for a truck bridge which makes the most sense to me would be one across the Duwamish River connecting the rail yard to 48th Place S. and to Interurban Avenue. Alternatively, the north entrance from Airport Way S. just north of the Boeing Access Road Bridge seem to be another logical choice.

The Duwamish Allentown neighborhood is both thriving because of its excellent location and relatively affordable housing, but it is also struggling because of the ongoing fight against overdevelopment and heavy truck traffic issues.

Please take these concerns and preferences into consideration when making the final rerouting decision.

Thank you.

Respectfully,

Sent: Saturday, March 11, 2023 8:54 AM **To:** allentowntruckreroute@tukwilawa.gov

Subject: EIS Scoping Comment

Attachments: Bridge powerpoint show 04.07.21 sml.ppsx

Categories: Allentown

CAUTION: [EXTERNAL] This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I am submitting comment for the Scoping period, Allentown Truck Reroute Project.

I am glad to see that maybe, finally, at the end of this process, Tukwila will have been able to fulfill the 30 plus year promise of moving a steady stream of trucks out of a residential neighborhood and also provide better access to the intermodal yard for freight movement.

I have attached a PowerPoint as part of my comment. Submitted to the City a year ago, most of it continues to be valid.

In addition, I'm disappointed the city has lacked imagination on this whole project; from not repurposing the old bridge (even for pedestrians), to simply picking the proposed boring replacement bridge out of a catalog.

Sincerely,

30 years later... The Allentown bridge SNAFU



Overview:

- •BNSF truck traffic was to be only "temporary" on the 42nd Ave. bridge.
- •30 years later, trucks still rumble through the Allentown neighborhood, spewing diesel exhaust; creating noise, health and safety hazards for residents.
- •Tukwila does NOT seem to maintain the 42nd bridge to modern standards. It can not handle the continuous weight of the trucks in its current condition
- •An "alternative" truck bridge had been proposed by the City at 48th S. in 2016
- •The City seems to have forgotten about the need for a new truck bridge on 48th S. and is planning on a new bridge on 42nd to handle even more trucks:

Design opportunities

BNSF requests that the new bridge be designed to handle current and future load capacity as well as incorporate the ability to support double-trailer trucks. Baker Commodities also advocates that the bridge be designed with large trailer trucks in mind. The Tukwila Community Center viewed the design of the new 42nd Ave S Bridge as an opportunity to create better cohesion between the community center, the bridge, and the Green River Trail in an effort create a welcoming gateway to the Allentown neighborhood.

"

42nd Ave. steel truss bridge.

An important link for the community but **neglected** by the City of Tukwila.



42nd Ave. steel truss bridge.

An important link for the community but **neglected** by the City of Tukwila.

WSDOT bridge criteria:



Home » Bridge » Our bridges around the state » Bridges & structures condition ratings

Menu

Border bridges

Condition ratings

Inspecting

Preserving

Movable bridges on state routes

Bridges & structures condition ratings

The safety of bridge structures in Washington state is ensured through a meticulous <u>inspection system</u>. All public bridge owners, such as Washington State Department of Transportation, counties and cities, follow the same bridge inspection procedures. The condition rating of all bridge decks, superstructures and substructures and other elements based on these inspections.

USDOT's Federal Highway Administration (FHWA) requires all public bridge owners (state, city, and county) to inspect and their bridges and report information including bridge condition ratings as part of their requirements in the National Bridge Inventory Standards (NBIS).

- All states must perform periodic inspections of bridges greater than 20 feet in span on at least a biennial basis.
- Data collection was standardized and must be reported to FHWA.
- Qualifications for inspection personnel were defined.
- Training programs were developed and implemented.
- The Bridge Replacement Program (BRP) was established to provide funding for bridge replacement on the system.

King County bridge criteria:

VII. BRIDGE PRESERVATION

The intent of a bridge preservation program is to perform cost-effective projects to extend the useful life of the bridge. The bridge preservation program includes the following work categories:

- Load Upgrades
- Bridge Re-decks
- Bridge Painting
- Scour/hydraulic Projects
- Bridge Seismic Retrofits
- Bridge Maintenance Repairs

King County DLS Road Services Division 2019 Annual Bridge Report

Bridge Washing

Bridge washing is an annual program to pressure wash steel truss bridges and other vulnerable structures. The intent of the program is to extend the life of the paint and the steel and to remove dirt and debris which would obscure inspection of the bridge. Most of the steel bridges are fracture critical and a clean surface will allow a quality inspection of the fracture critical elements. The following bridges were pressure washed by County forces in 2019: Green River Gorge Bridge No. 3032, Raging River Bridge No. 1008E, Mt. Si Bridge No. 2550A, and Stossel Bridge No. 1023A.



https://kingcounty.gov/de pts/local-

services/roads/bridges.asp x#reports

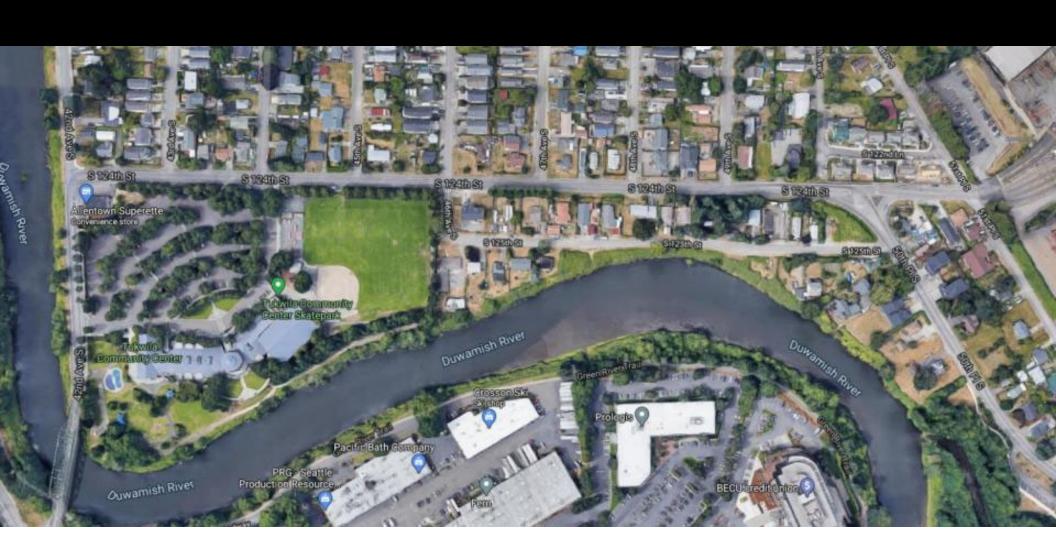
Mt. Si Bridge No. 2550A during bridge washing process.

42nd Ave. steel truss bridge.

An important link for the community but **neglected** by the City of Tukwila.

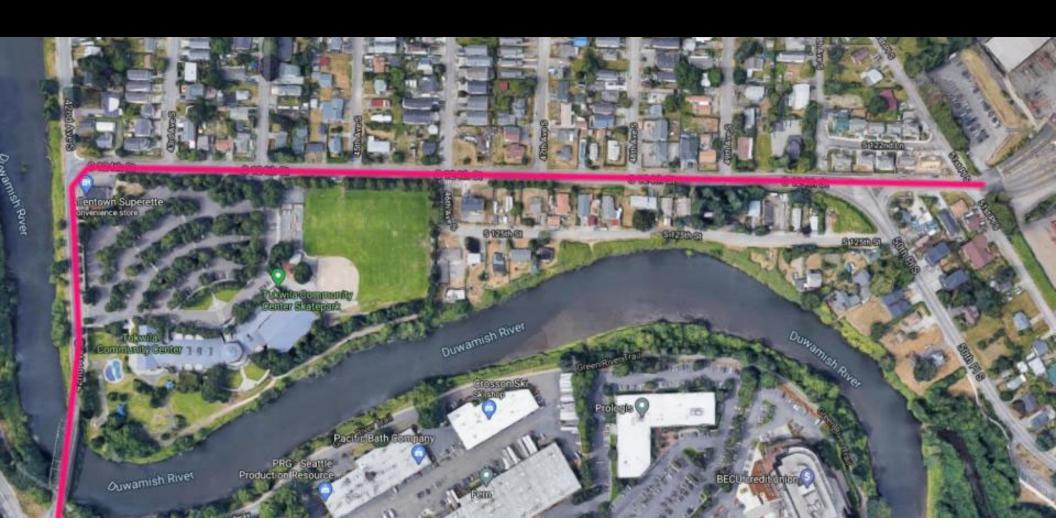


Allentown Neighborhood

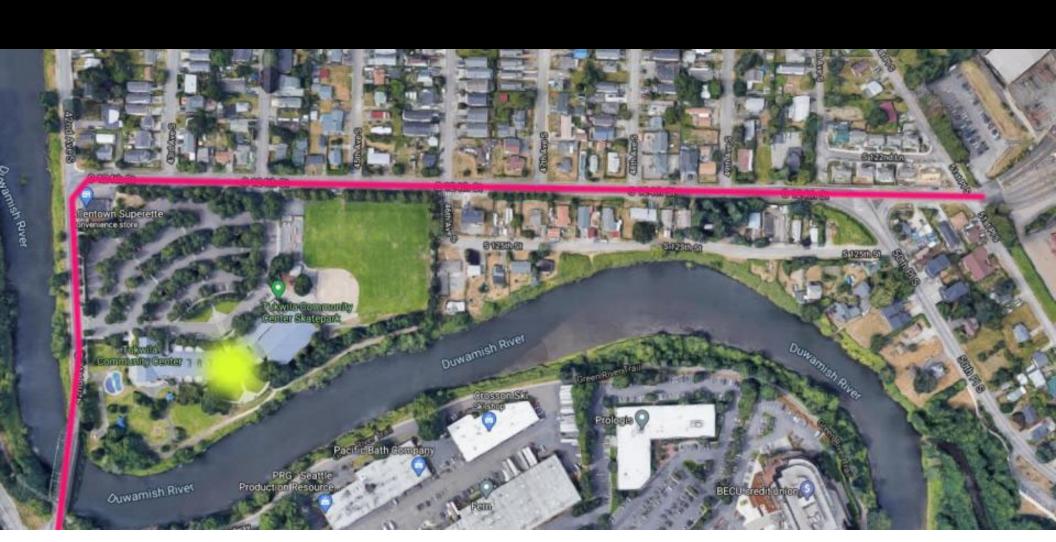


Allentown Neighborhood

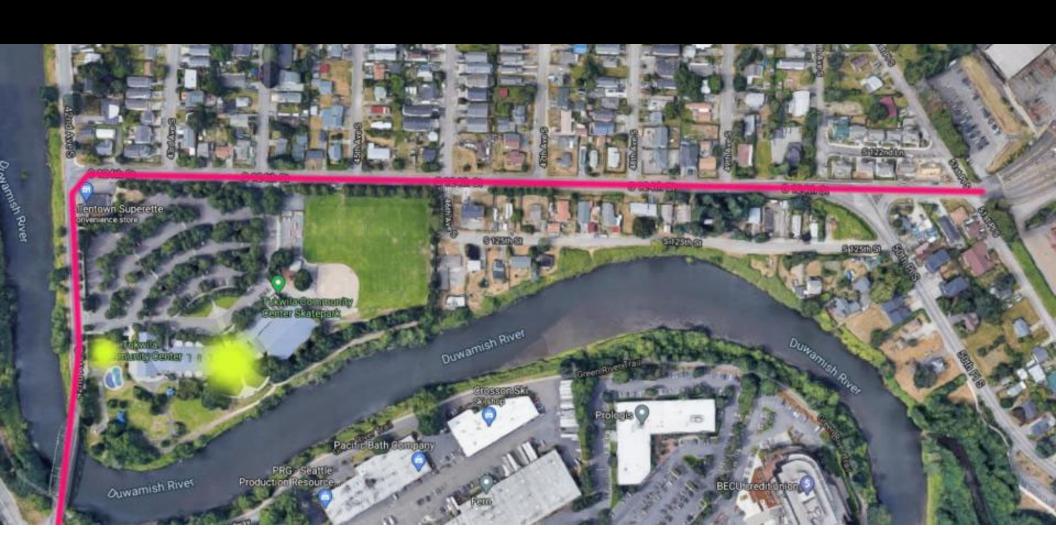
Current Truck Route



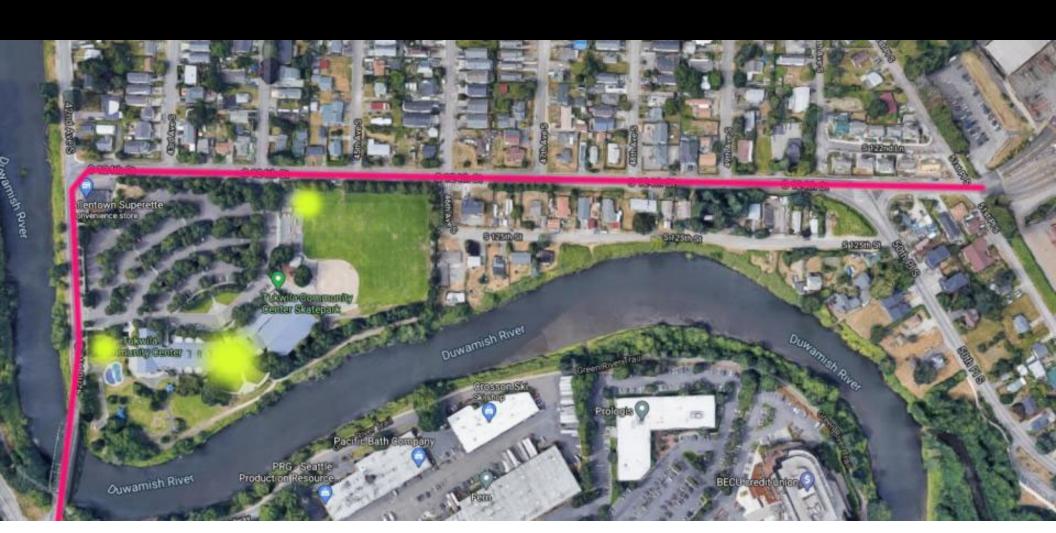
•Tukwila Community Center



- •Tukwila Community Center
- Children's Splash Park

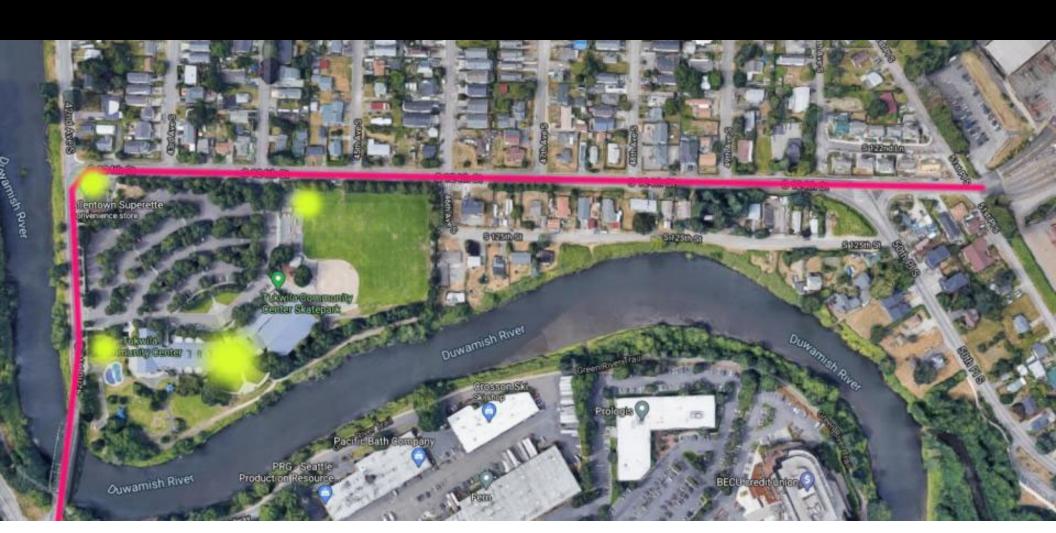


- •Tukwila Community Center
- •Children's Splash Park
- •Skate park and Playfield



- •Tukwila Community Center
- •Allentown Superette

- •Children's Splash Park
- •Skate park and Playfield

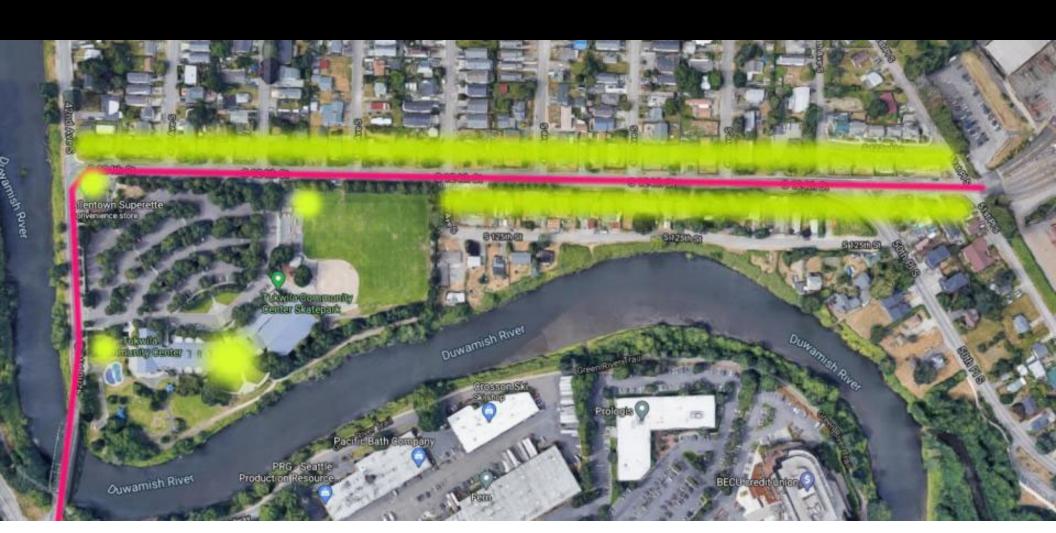


- •Tukwila Community Center
- Allentown Superette

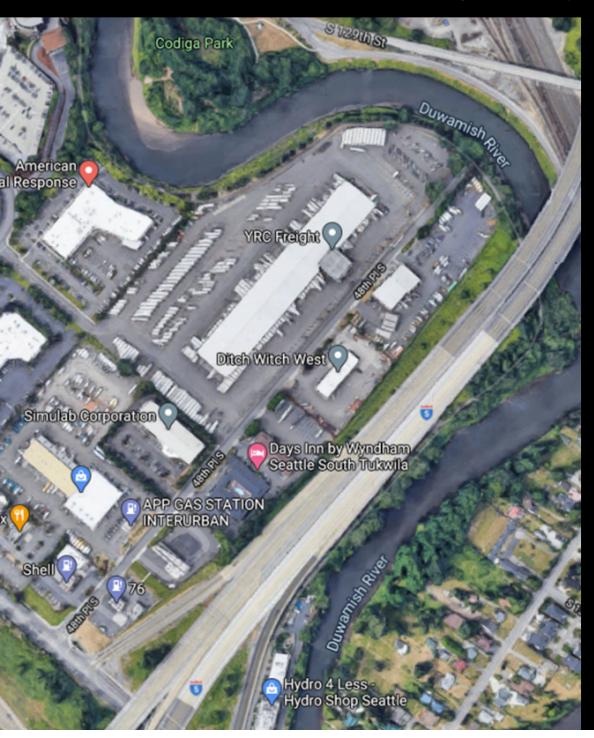
•Children's Splash Park

•Over 45 homes and yards front truck route

•Skate park and Playfield

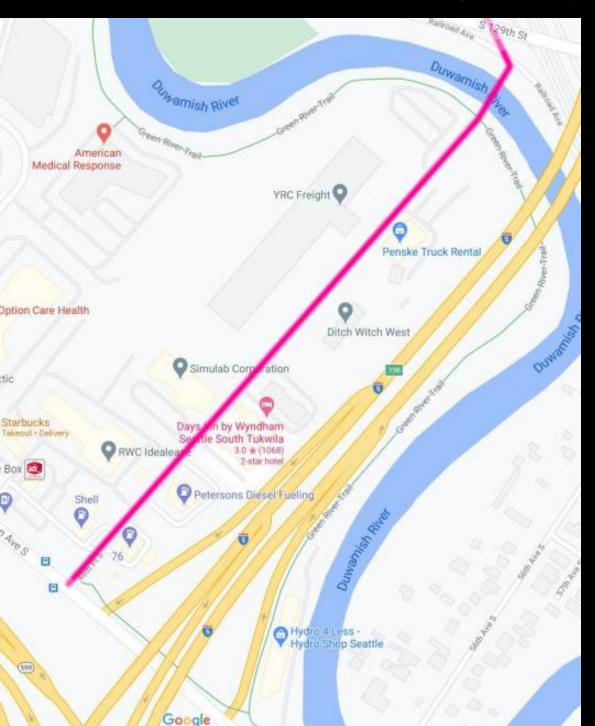


48th Place S: All about Trucking, Transportation and Travel



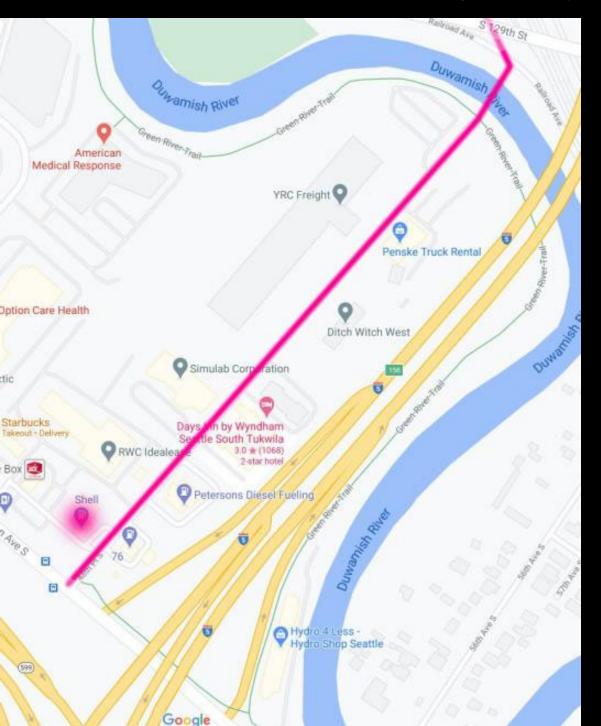
Alternate Route

48th Place S: All about Trucking, Transportation and Travel



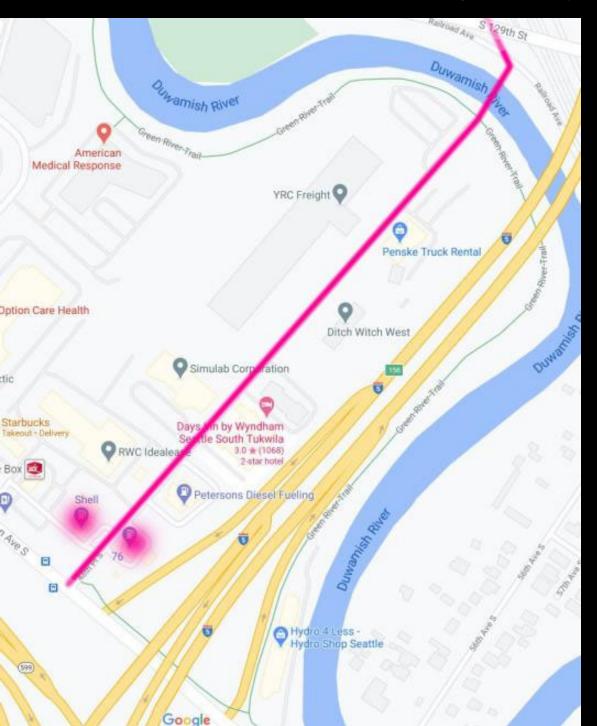
Alternate Route

48th Place S: All about Trucking, Transportation and Travel

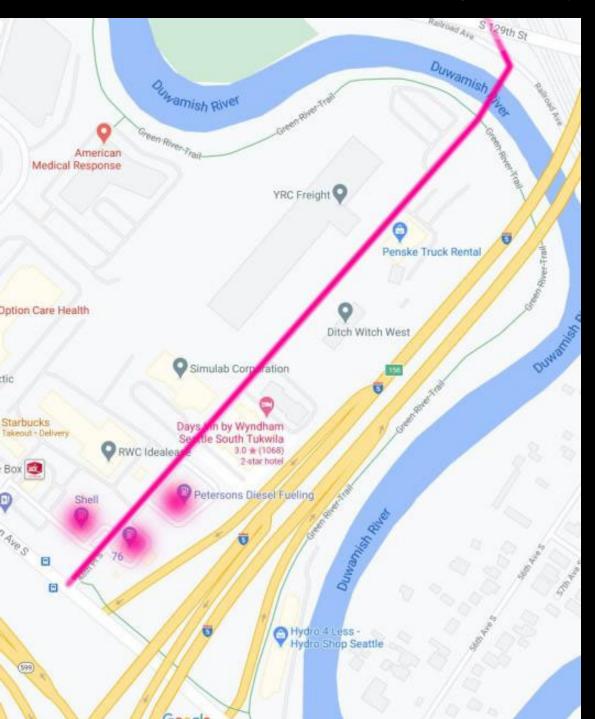


•Shell Fuel Station

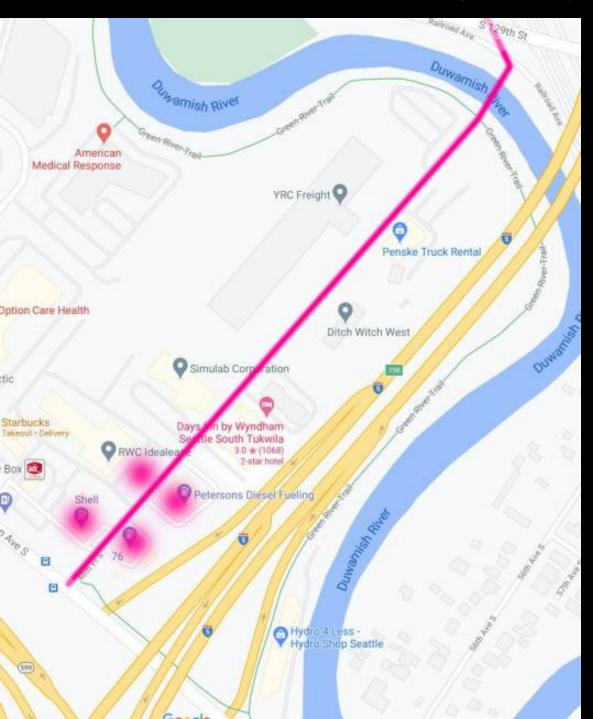
48th Place S: All about Trucking, Transportation and Travel



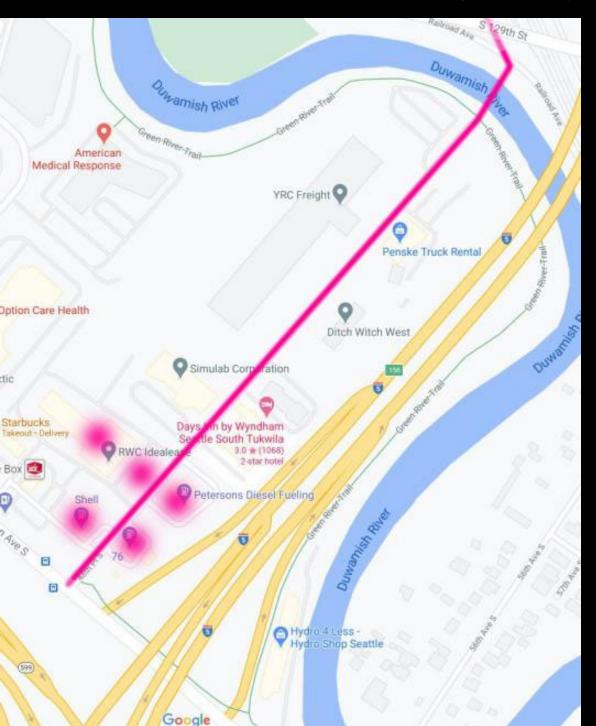
- Shell Fuel Station
- •76 Fuel Station



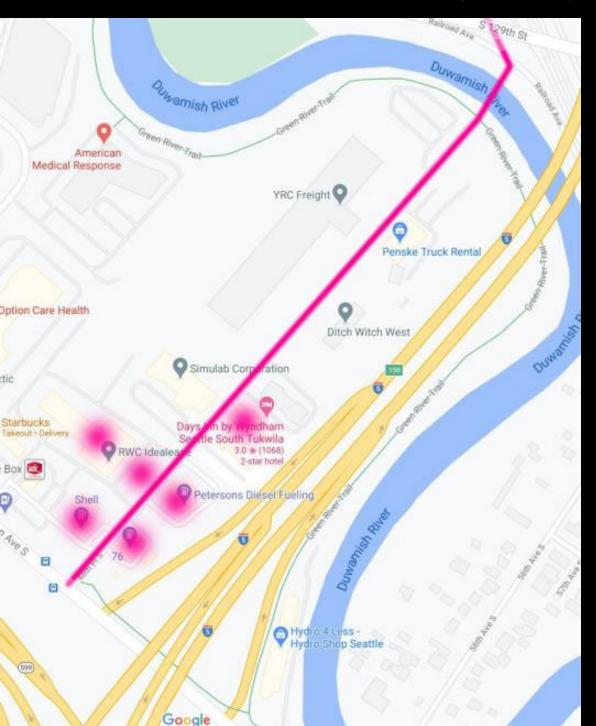
- Shell Fuel Station
- •76 Fuel Station
- Petersons Diesel Station



- Shell Fuel Station
- •76 Fuel Station
- Petersons Diesel Station
- •APP Diesel Station



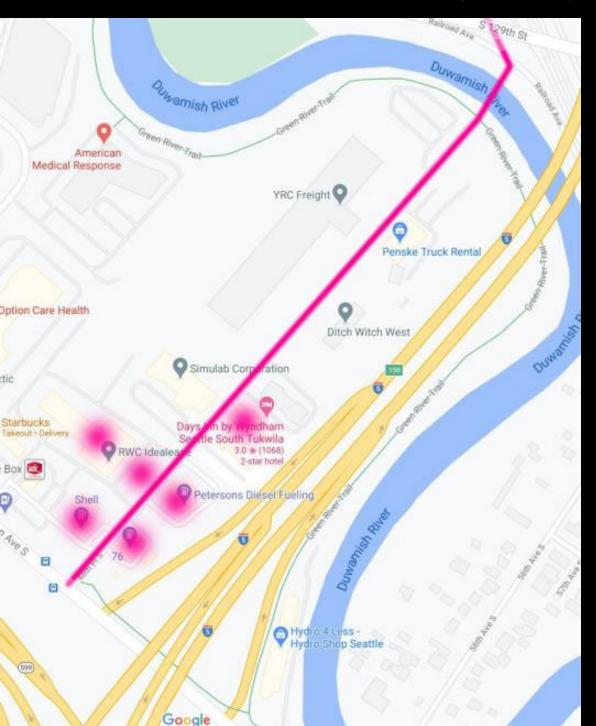
- Shell Fuel Station
- •76 Fuel Station
- Petersons Diesel Station
- •APP Diesel Station
- •RWC Truck Dealership



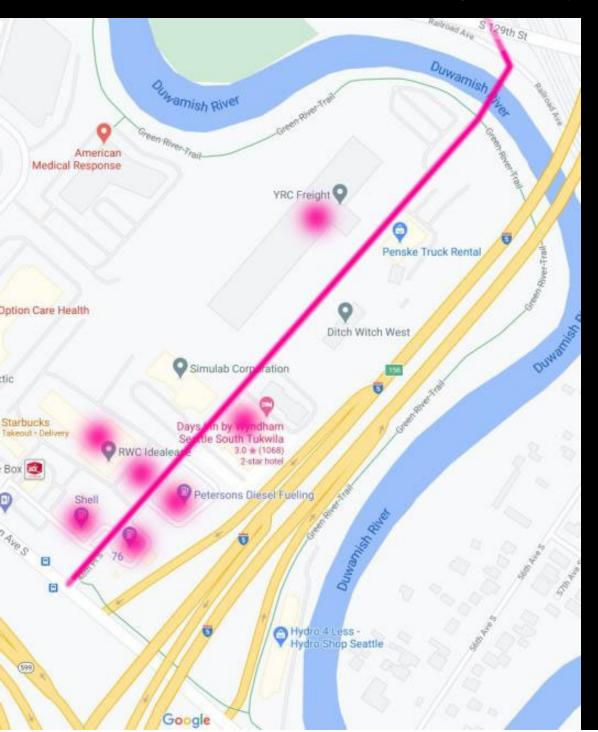
- Shell Fuel Station
- •76 Fuel Station
- Petersons Diesel Station
- •APP Diesel Station
- •RWC Truck Dealership
- Days Inn (18 semi parking spots)



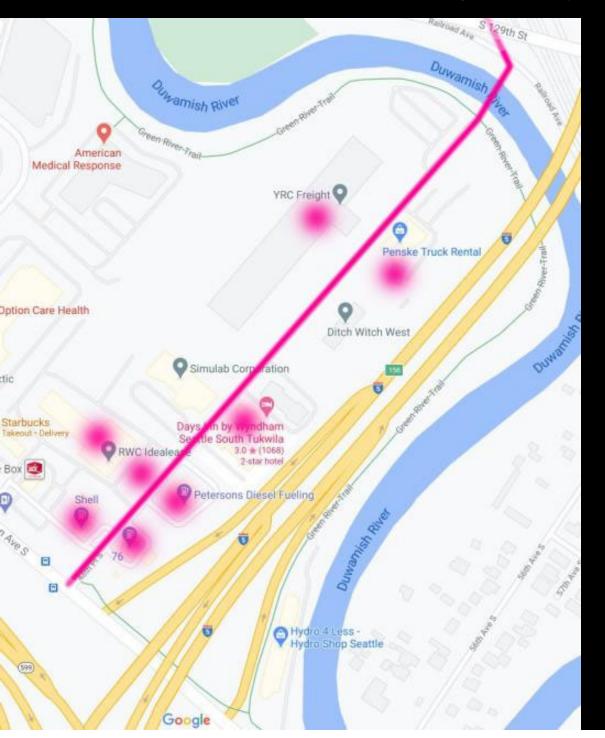
- •Shell Fuel Station
- •76 Fuel Station
- Petersons Diesel Station
- •APP Diesel Station
- •RWC Truck Dealership
- Days Inn (18 semi parking spots)



- Shell Fuel Station
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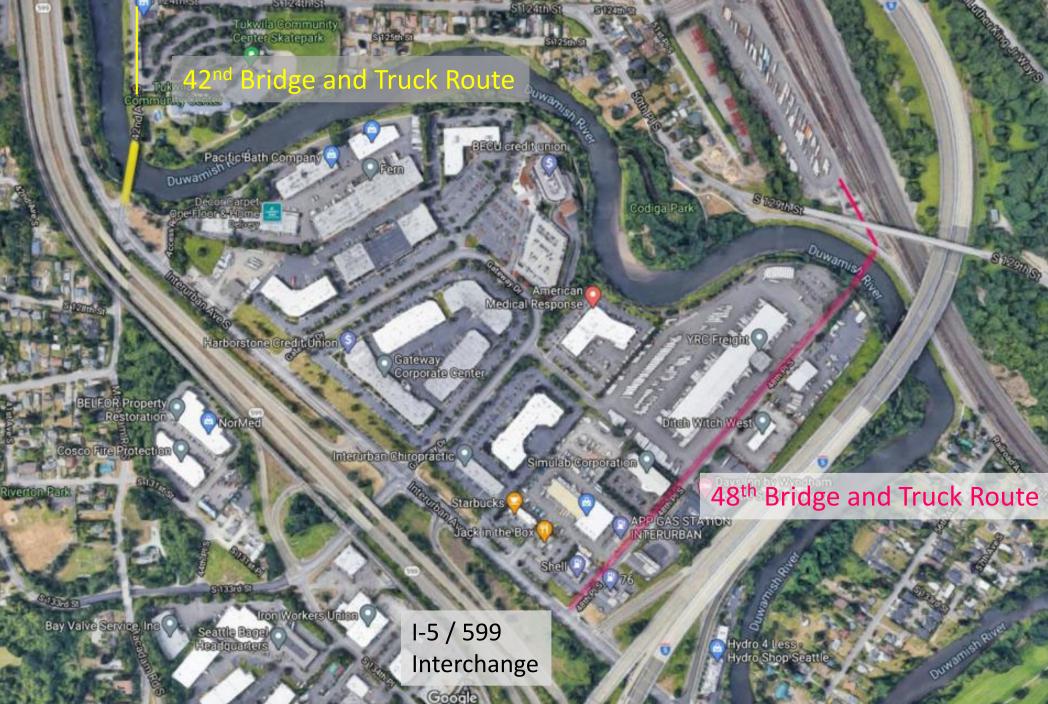


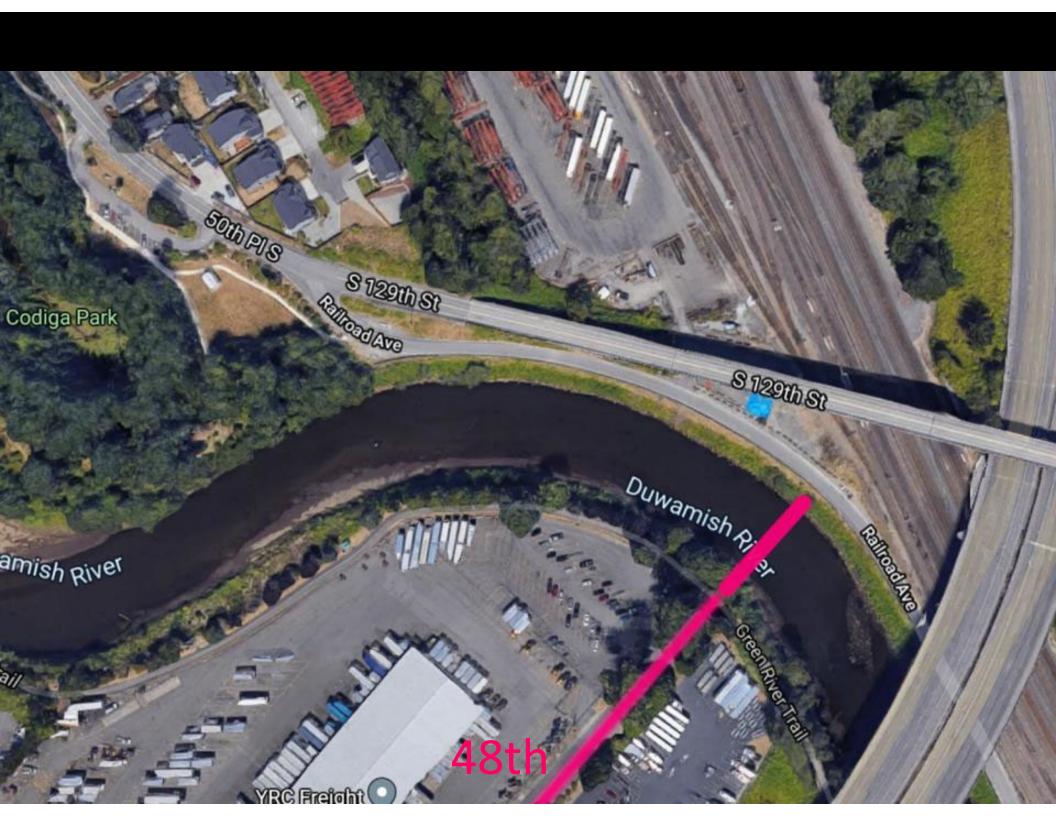
- •Shell Fuel Station
- •76 Fuel Station
- Petersons Diesel Station
- •APP Diesel Station
- •RWC Truck Dealership
- Days Inn (18 semi parking spots)
- YRC Freight Depot

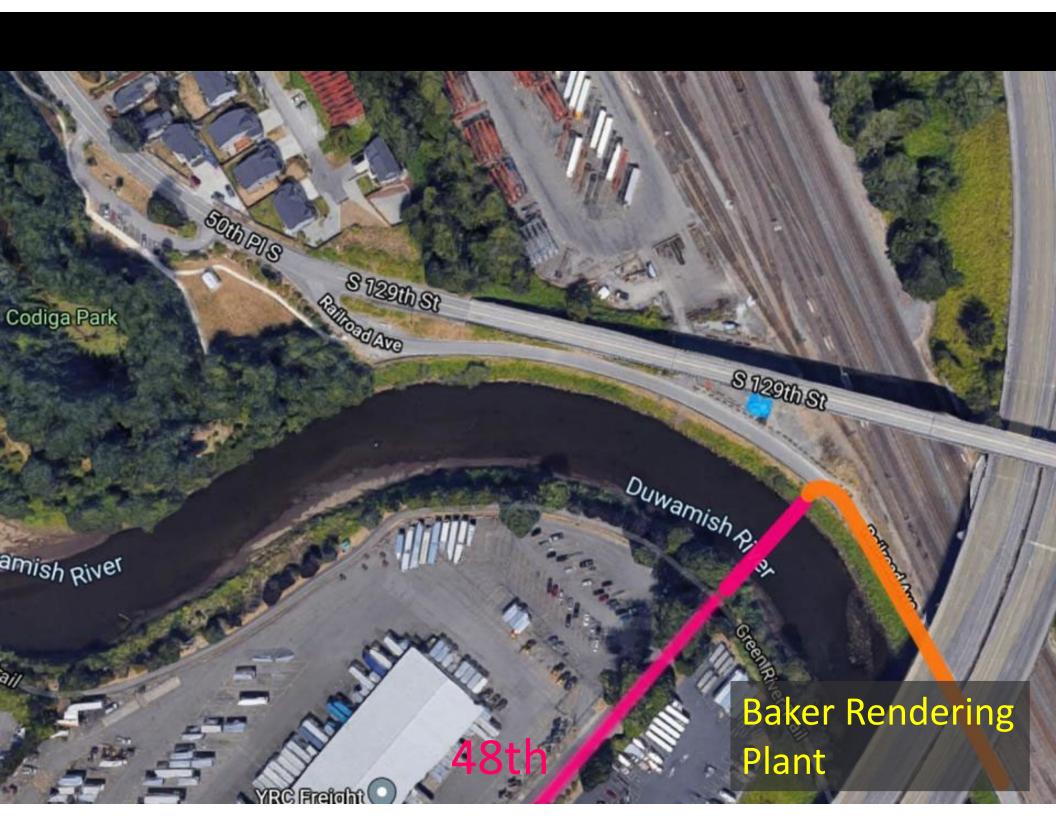


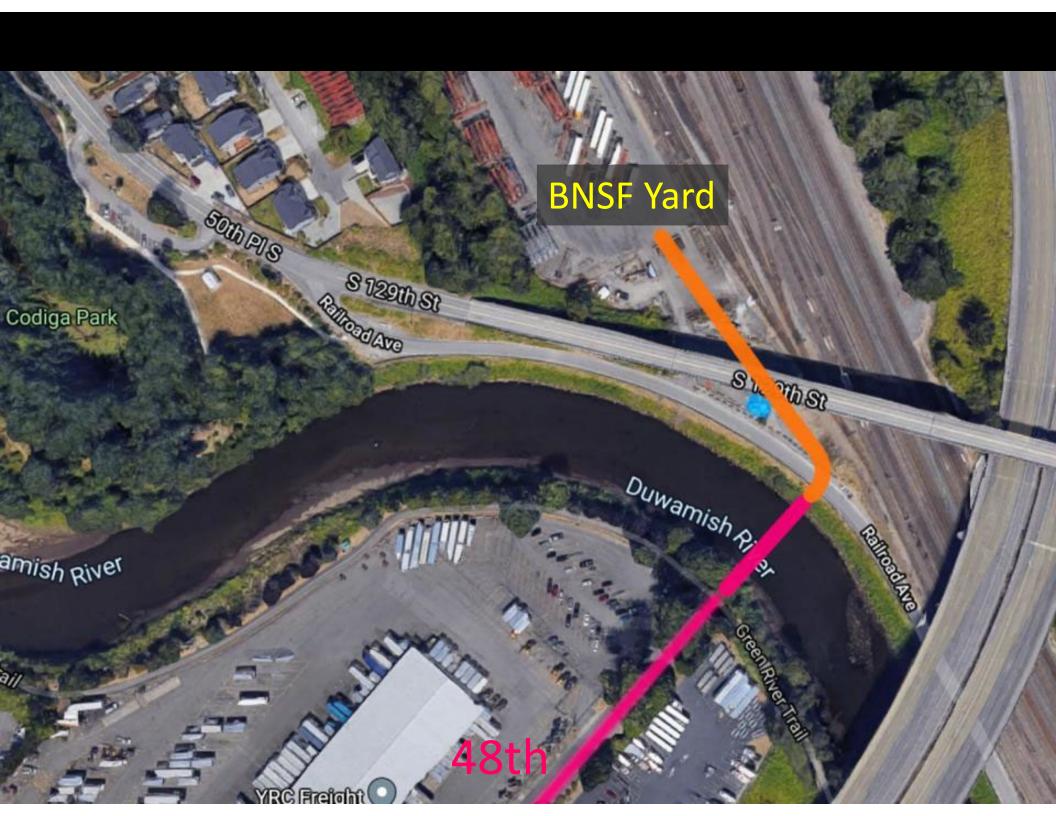
- •Shell Fuel Station
- •76 Fuel Station
- Petersons Diesel Station
- •APP Diesel Station
- •RWC Truck Dealership
- Days Inn (18 semi parking spots)
- YRC Freight Depot
- Penske Truck Rental

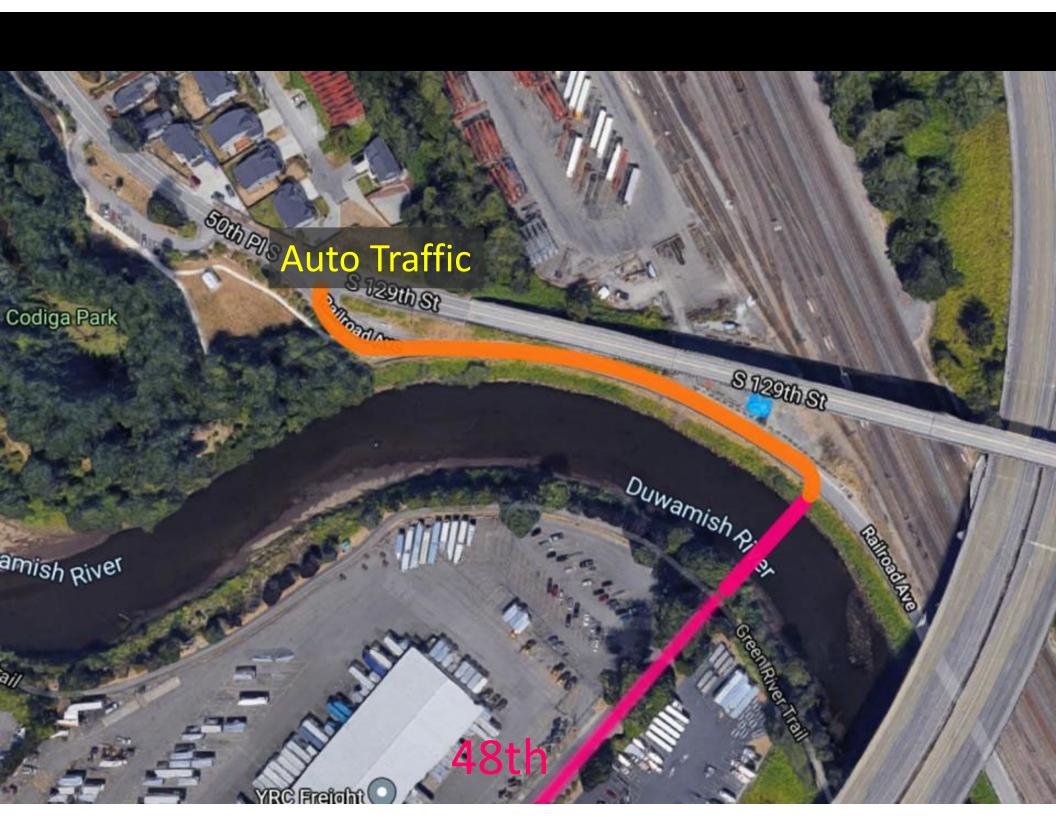
Aerial Comparison Tukwila Gommunity Center Skatepark idge and Truck Route BECU credit union













42nd bridge crossing is aprox. 280'

- •Shallow river depth = greater width.
- •Obtuse angle to align with road.
- •Temp. bridge would wipe out Children's Splash Park.



42nd bridge crossing is aprox. 280'

- •Shallow river depth = greater width.
- •Obtuse angle to align with road.
- •Temp. bridge would wipe out Children's Splash Park.

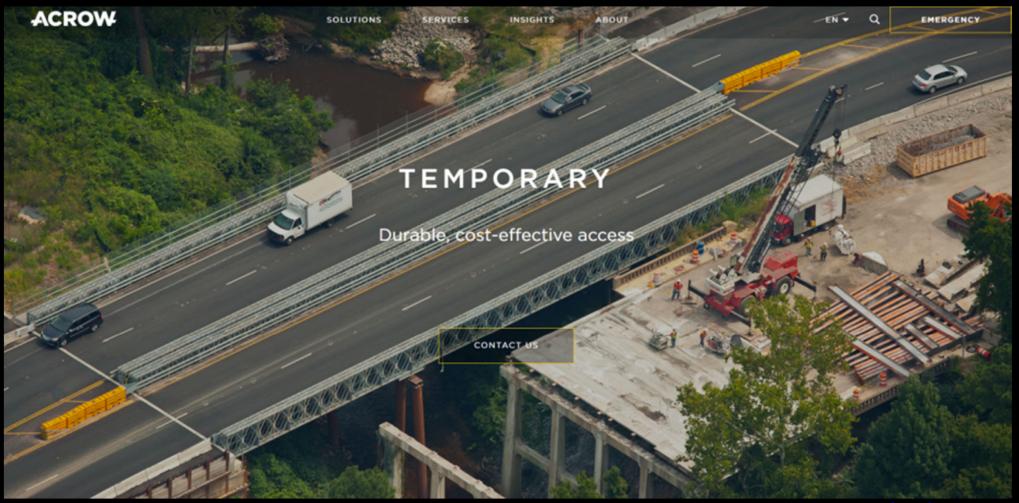
48th bridge crossing is aprox. 190'

- •Much narrower river width.
- •Shorter bridge, less cost.

Plenty of room for temp. bridge



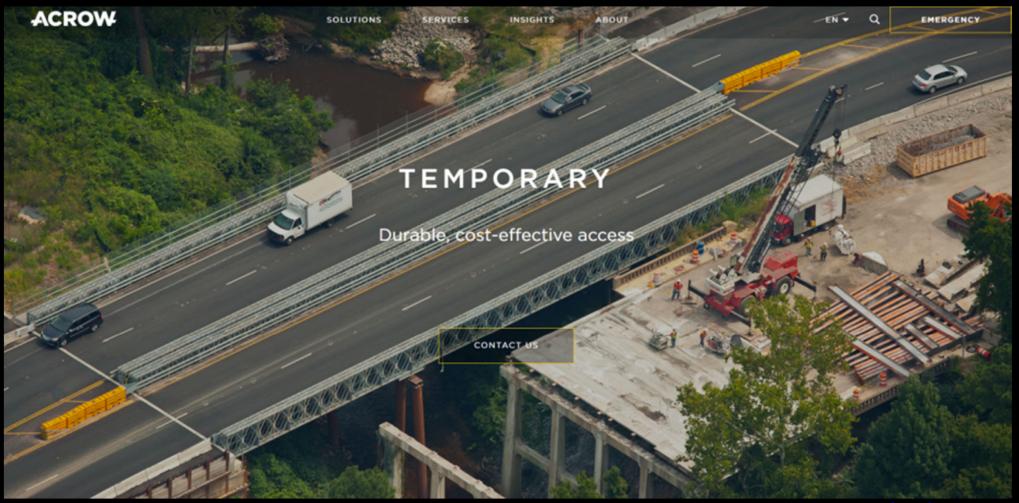
Putting a temporary bridge in at 48th should be the first step.



acrow.com temporary-bridges

Putting a temporary bridge in at 48th should be the first step.

Declaring this an emergency will allow time for the permanent bridge SEPA process.



acrow.com temporary-bridges

Putting a temporary bridge in at 48th should be the first step.

Declaring this an emergency will allow time for the permanent bridge SEPA process.

form within 10 days of commencing the action, and the proponent must later file an EIR after the emergency action is taken. Id. § 11.13(2).

By comparison, the Washington State Environmental Policy Act (SEPA) does not include any relevant statutory or regulatory provisions that would exempt emergency actions. However, the Washington Department of Ecology guidance on SEPA provides that a lead agency can grant an emergency exemption if an action meets two conditions. First, the action must be "needed to avoid an imminent threat to public health or safety," and second, there must not be "adequate time to complete SEPA procedures."

Similarly, after major disasters, states issue many waivers. For example, after Hurricane Katrina in 2005, the

https://www.arnoldporter.com/emergency-environmental-laws-

A Way Forward:

- Put the temporary bridge in place <u>immediately</u> at 48th.
 Get trucks off 42nd bridge and out of the neighborhood.
- •Concurrently design a new, permanent 48th bridge and apply for SEPA, construction funds, etc.
- •Concurrently repair, reinforce, existing 42nd bridge. Without truck traffic, a few more years of life might be available. Then design and install a replacement.
- •Auto traffic can also use 48th bridge during any 42nd bridge work.

Further Reading:

acrow.com temporary-bridges

https://wsdot.wa.gov/bridge/our-bridges/bridges-structurescondition-ratings

<u>https://kingcounty.gov/depts/local-services/roads/bridges.aspx#reports</u>

https://en.wikipedia.org/wiki/National Bridge Inventory

PHASE 2

May 3, 2023 – June 1, 2023

Number	Submission Date	Submission Type	Scoping Comment (Routing Alternatives and EIS Issues of Concern)	EIS Process Feedback (Opt.)	Neighborhood (Opt.)	PDF Available
1	5/3/2023	Online	I have read the information on what each alternative entails. I believe the least impactful would be Alt 2 Many of the alts involve construction of a new bridge. We already are facing the replacement of the 42nd Street Bridge with all the dust, noise, disruption and inconvenience that will cause. I believe it would be profoundly deleterious to the quality of life in Allentown to subject		Allentown 42 nd Ave S	
			the citizens here to another major construction project (ie another bridge build)			
2	5/3/2023	Online	I believe alternative #2 is the ONLY viable re route. It is the easiest to accomplish in the shortest amount of time. It would not need excessive funding from the public to benefit BNSF. It is the financial burden of BNSF to re route their trucks causing the environmental damage to our neighborhood.		Allentown/ Duwamish	
3	5/4/2023	Online	I believe that the Alternative route 2 would be the best proposed idea. This route doesn't include any new bridges across the Duwamish river and the route is long. The route also doesn't cross by any homes which would reduce the chance of negatively impacting the residents of Tukwila from the noise and air pollutants that the trucks produce. However, the route is a little near to the Duwamish river, which may have the possibility of polluting that side of the river		Foster High School	
			Some issues you should analyze would be how close it is to the river. The river could be negatively impacted by the air pollutants or waste.			
4	5/4/2023	Online	I think the best routing alternative is the one that will cost the least amount of money to construct, the one that has the least environmental impact to the Duwamish river and the least amount of truck traffic through the neighborhood of Allentown.		Foster High School	
			The Duwamish river is already so polluted. Any construction near the river will make it even worse. Roads would have to be widened, which can lead to cutting down trees and other plants. Construction close to the neighborhood, would cause even more of a disturbance.			

5	5/4/2023	Online	I think number 2 its a good route because there is not houses and thats good becuase they dont impact people with the air pollution from the trucks. I think the smoke of the trucks can afect the air for the people who work closely from there or actually can afect the animlas too and they can also affect the businesses that are around	Foster High School
6	5/4/2023	Online	I believe route 3 is the best decision for re-routing the trucks because they're creating a new bridge, a new noise cancellation wall so people wont hear the trucks pass by and its the most convenient for trucks enter and exiting. With this rerouting this will save many people's live because of the health hazards these passing trucks come with. We should analyze the area of the duwamish river and find out whether it is busy or not at the moment. The population of this area, the amount of houses, businesses beside this location, and also how the new bridge will effect the Duwamish river.	Foster High School
7	5/4/2023	Online	I think that the best route is Alternative 3 because it has a New noise wall that can help prevent the sound of trucks passing by. I like this idea because with the current route residents/homeowners can hear the loud noise of trucks passing by their houses. With the alternative 3 route issues that they can have is how the new bridge can have problems.	
8	5/4/2023	Online	Route number 2 seems a lot more safe to me beause it would cause less damage to allentown community. There arent any houses near route 2. we wouldnt be polluting areas in allentown. this route would cause less damge to our nature resores then compare to the other routes. Will the road be built it will distroy our natural resource? How will the river be impacted by this route option?	Foster High School
9	5/4/2023	Online	Alt.1 & 2 are direct routes, to & from the rail yard, These are the best alternatives! Alt.routes 1& 2 are the best, routes to & from the, rail yard!	Allentown

10	5/4/2023	Online	i feel that route 3 is better because its next to a truck stop and gas station so the trucks have easier access and its also not a longer route compared to route 4 and 5. how this route would affect the new bridge being built and how it will affect the duwamish river.			
11	5/4/2023	Online	Routing 1 and 2 is preferred (on north side of the terminal) because trucks will no longer go through our neighborhoodthe noise and vibrations have caused much disruption on many levels to us here at Empire View Mobile Home Park5711 S. 129th St., Seattle, WA 98178 Thank you for considering our well-being! Impact on the people, air, animals and birds!		Unincorporated King County near Allentown	
12	5/6/2023	Online	Regarding Trucking on S. 129th St. and Re-Route Project I have submitted several comments before about this issue. I do not know how this can be allowed to happen, and continue. Besides impacting my health, which my doctor has been concerned about, the noise and vibrations have interfered with my sleep and rest, day and night. Then those horrible CO2 emissions! Major impacts on me and others here—and trees and birds! The truck tires cause damage to the road and residual damage to the environment. My car is being trashed with the hideous ruts all over the roadway—tires, alignment, etc. Please make these awful trucks stop their rumbling on 129th Sreet! Route should be north of the yard#1 and #2. Thank you for consideration of the very real issues around the impacts of these trucks. CO2 emissions and impact of truck tiresalso what the volume of trucks has done to the I-5 overpassis this sustainable?	How soon will this truck traffic be re-routed? It really isn't sustainable with the status quo. Thank you. I think I might be on the email list, but please add me if I'm not.	Unincorporated King County near Allentown	

13	5/10/2023	Online	In general, truck traffic should not be allowed in the residential neighborhoods. Many environmental and human impacts. Common sense, please. I am really concerned about the the road get to my home. It is always truck and a lot of truck. They are big and sometimes drive really fast! Not just that! The bridge next to the Tukwila community center is closed one way and it is really inconvenient for me to go back home! It is take way longer! And take more expenses! I am hoping that the Tukwila city can fix it so that we can be more convenient to get home and safer!		
14	5/10/2023	Letter	 We are the tenants of the Empire View Mobile Homes located near S. 129th St. We are writing this letter to request you to re-route the trucks away from S. 129th St and other residential neighborhoods. Several of us have made concerns regarding the trucks using this route. Please see details below: S. 129th St is currently on a hill. We have been concerned as truck drivers have been driving really fast down this hill. We are afraid that one day they may swerve into the houses. Even during rainy days or snow, these trucks are still going downhill fast. There are local children in this neighborhood. Trucks driving down this hill may not see children and or not be able to break as fast due to the steep slope. We are worried about the amount of trucks driving past this street posing a direct threat to human health and the environment. This causes parents not wanting their children to play in the front yard or elders going on their walks. Residents are not able to be well rested due to the noise and vibrations caused by the numerous trucks rumbling up and down the street. Pavements and crosswalks are ruined by the trucks causing multiple pot holes on this street. Uneven pavements pose a fall risk to the residents. Everytime a truck drives on this hill, it makes the homes in the neighborhood vibrate very similarly to a small earthquake. 	Empire View Mobile Homes	Yes

			We hope that you take our concerns regarding this matter seriously and re-route the trucks away from S. 129 th St and away from residential neighborhoods. Thank you for your consideration, we will be glad to answer any questions you have. Sincerely, Tenants of the Empire View Mobile Home Park.			
15	5/22/2023	Online	I am leaning toward the north end options. No costly bridges required and the logic of the truck traffic being in a commercial area next to the freeway. I have a lot of questions about the alternatives.	I feel the comment period was not organized properly. The community only has 8 days to comment after they have the opportunity at the community meeting to ask questions.	Allentown	
16	5/23/2023	In-person Comment Form	Alt 3 Bridge to 48 th 1. Will there be a traffic light on Interurban? 2. Costly 3. Impacts to rile (sp?) 4. BNSF like it best 5. Need to partner w/ Muckleshoot & US Coast Guard 6. Some elevation engineering issues 7. Build an underpass 8. Like 9. Much prefer to the current route			Yes
17	5/23/2023	In-person Comment Form	EIS Considerations: 1. 6 PPDs/tire dust 2. Air quality – how will it change? 3. Sound Levels – how will it change? 4. Light pollution – how will it change? 5. Water quality – how will it change? 6. Water table (sp?) – how will it be impacted? 7. Residential/neighborhood safety			Yes

			 8. Death rates – how will it change? Mortality rates 9. Rates of heart disease, infant mortality, incomplete pregnancies, etc. 10. Environmental justice 11. Cultural impacts 	
18	5/23/2023	In-person Comment Form	Alt 5 – Build New 1. Cost of creating a whole new structure 2. Like the idea of dedicated lane for truck. 3. This makes more sense than 4 will let trucks go North & South 4. Good that it uses the "lay down" yard. 5. Good there will be a sound wall 6. How impact to neighborhood 7. Better than Alt 4	Yes
19	5/23/2023	In-person Comment Form	Alt 4 – Codiga Bridge (129 th) 1. How will trucks make the sharp turn? 2. Existing bridge needs to be enhanced – 3 rd lane + strengthen 3. Will use "lay down yard" – good! 4. Will be close to 1 home 5. Need a noise wall (barrier) 6. Would need to coordinate this w/ Skyway (unincorporated) 7. No good route to I-5 South (create an on ramp!)	Yes
20	5/23/2023	In-person Comment Form	Alt 1 Comments: 1. Will there be a stoplight on E. Marginal Way for truck ingress/egress 2. Can there be a sound wall to protect Duwamish Preserve from truck noise? 3. How will you manage all the things that BNSF placed there blocking this route 4. Good: No new ramps, no new bridges 5. Are there any protected wetlands on this route?	Yes
21	5/23/2023	In-person Comment Form	Alternative 2 1. Easiest route 2. Least impact 3. Low cost 4. Trucks always in industrialized zones (not in residential streets) 5. Safety concerns? 6. Security concerns?	Yes

			7. Not near the river8. Noise reduction in neighborhoods9. Pollution reduction in neighborhoodBEST OPTION		
22	5/23/2023	In-person Comment Form	Alternative 4 & 5 I am against as it would be across the street from my home on 51 st . There is a new home that would be in the front of the road that is planned. I do not want to look at a wall across from my home. Alternative 2 is the best route. There are evergreen trees there now and they would stay if Alternative 2. Evergreen trees would not be cut down if Alternative 2 Noise, fuel smell, house rattling, dust	Allentown	Yes
23	5/23/2023	In-person Comment Form	Prefer Alt 2 — Reduces noise and safety impacts in our neighborhood. Alt 2 also appears to be the easiest and least expensive option. Noise and safety are #1 concern	Allentown	Yes
24	5/24/2023	Letter	It was noted by Baker Commodities that there are some changes to the previous reroute of truck traffic through Allentown. Also a comment in last night's meeting about removing all trucks from access to 124 th and the 42 nd Ave Bridge. Our concern is that you are not taking into consideration the Baker Commodities truck fleet in your conversations when looking at or developing new truck routes. Baker does not run the same type of equipment as what is going into or out of the B&N facility. Our truck and trailer configurations are much longer at 68 feet. Alternative Routes #1, #2 look to be the best option for removal of B&N traffic but does nothing for Baker traffic. Same goes for option #5 but putting in another bridge coming off MLK does not look feasible due to grade and winter weather issues. Same goes for option #4. The 129 th bridge is bad enough when we have snow or freezing weather which opens up 42 nd Ave bridge and 124 th as alternatives during snow or freezing weather.		Yes

	Alternate route #3 our concern is design and how it would accommodate current businesses along this route and enable our equipment to use this access. Baker Commodities currently remains neutral but we have concerns that the City is not considering Baker equipment when discussing alternative routes			
25 5/24/2023 Online	Options 1 and 2 are financially logical due to not needing a new bridge. The area is located close to the freeways, is a commercial area not residential and FLAT. Large and steep hills are not logical for trucks. These options are farthest from the river as well for environmental issues. Airport Way directly to the north end of the railyard seems so logical and cheaper. Option 3 is costly for a new bridge. Have you looked at using the existing commercial Gateway Drive instead of a new road 100 feet from that. Again, hate ugly noise walls. Environmental issues because too close to river. Tribal will have to happen. Option 4 is on a steep hill which is not desirable for trucks. The cost would be very high with new ramp to I-5, noise walls are ugly, trucks will sneak through on 124th rather than go down or up a steep hill, still close to river, noise, air pollution. We would have the same problems. Option 5 Again so expensive with new ramp and new bridge. Not logical. Trucks would still sneak through on 124th to avoid a steep hill. Hate ugly noise walls. Double trucks are 68 feet long. How are they going to make turn at bottom. Trees and new homes affected. Noise and air pollution a concern as well. Too close to river. Funding through infrastructure bill. What is BNSF use of the north gate ? (It is unlocked at times) Anything close to the river will have to go through tribal.	Suggestions for future: use satellite maps for group discussions.	Allentown	

			BNSF revenue was up 11.9 % to 25.2 billion last year reflecting 18.9 % increase in average revenue per car. I think they can afford a few million to rearrange a small yeard			
26	5/25/2023	Online	million to rearrange a small yard. Support option 2 first (airport way) The north option is more cost effective, the furthest from the river, in a commercial area and close to the freeway. No new bridges or ramps required. 6PPD should be researched and the impacts to the environment and salmon Impacts of other chemicals related to tire wear which are harmful to humans and wildlife That tires wear quicker on local roads than on freeways Truck exhaust impacts to air, environment wildlife, salmon and humans Twelve eagles were spotted near the rail yard in Allentown a couple of weeks ago Long term exposure to PPH's and the different diseases such as risks of skin cancer, lung, bladder and gastrointestinal cancers. Chemicals that run off into storm sewers and soil.		Allentown	
27	5/26/2023	Online	Noise Impacts Based upon concurrent projects along transportation corridors, shared concerns with neighborhood traffic impacts, Alt.2 shows much promise; improvements/investment needed along the BNSF corridor/yard is no excuse for inaction. Routing Alternatives (and BNSF improvements) should seek to offset the ongoing issue of idling/camping freight traffic and streamlined loading processes. The Reconnect South Park project is underway, and concurrently performing an existing conditions analysis, with EIS coming in Fall 2023. We highly encourage the Allentown EIS team to connect with	Will the EIS team work with the Reconnect South Park consultant team? connect@reconn ectsouthpark.org	South Park	

			the RSP project group to identify opportunities between the two interconnected projects. We share a similar timeline, and SR-99 freight traffic rerouting alternatives have regional impact/opportunity.		
28	5/26/2023	Email	 Introduction The South Seattle Hub (SSH) in the Allentown neighborhood of Tukwila, WA is an important economic link to the Puget Sound Region. It serves as an inland port, providing domestic intermodal transloading between truck and rail. The ability for trucks to access the facility both safely and efficiently is essential for consumers and industry throughout the region. BNSF recognizes the City of Tukwila is developing an Environmental Impact Statement (EIS) process to vet the alternatives to the 42nd Ave S bridge replacement. As a key stakeholder in the proposed project that contemplates potential reroutes to the truck traffic patterns relative to the South Seattle BNSF Intermodal Facility, BNSF Railway provides the following comments on the preliminary alternatives that are being considered. Alternative 1 Alternative 1 is not feasible. Trucking entrance/exit functions are handled at the southern end of the facility. The north end exists currently as the most congested part of the facility. Shifting traffic to the north would mix incoming and outgoing trucks with live transloading operations, creating both safety concerns and traffic congestion in and around the facility. Inbound/outbound truck traffic from the north would interfere with the car department and mechanical maintenance shop at the north end of the facility. Significant modifications to the existing facility would be required as part of Alternative 1 to prevent gridlock in the facility and surrounding area. Additional concerns integrating truck traffic with an existing utility corridor due to powerline clearances, weight restrictions, etc. The alternative would require multiple left turns coming from I-5. 		Yes

 2. Alternative 2 Alternative 2 is not feasible. Trucking entrance/exit functions are handled at the southern end of the facility. The north end exists currently as the most congested part of the facility. Shifting traffic to the north would mix incoming and outgoing trucks with live transloading operations, creating both safety concerns and traffic congestion in and around the facility. Inbound/outbound truck traffic from the north would interfere with the car department and mechanical maintenance shop at the north end of the facility. Significant modifications to the existing facility would be required as part of Alternative 2 to prevent gridlock in the facility and surrounding area. Trains are built on the northern ladder tracks of the facility and the proposed Alternative 2 parallel road would route trucks in conflict with on-the-ground switchmen and mechanical forces in an active rail corridor 	Phase 2: Commen	t Table	
 A parallel access road would put constraints on facility infrastructure Significant truck traffic backup predicted with this option due to anticipated challenges with bi-directional traffic along the proposed route in and out of the facility Potential impacts to Sound Transit Link Light Rail bridge as well as the S. Boeing Access Rd Overpass to accommodate this option. Alternative 3 Alternative 3 is BNSF's preferred alternative. Alternative 3 would have the least impact on current trucking and transload operations at the facility. Maintains existing and consistent access to on and off ramp highway infrastructure while reducing truck impacts on the local road network and Allentown residents. Creates simplified opportunities to reconfigure the south end portion of the facility as part of the city's project scope with minimal changes to existing operations. 		Alternative 2 is not feasible. Trucking entrance/exit functions are handled at the southern end of the facility. The north end exists currently as the most congested part of the facility. Shifting traffic to the north would mix incoming and outgoing trucks with live transloading operations, creating both safety concerns and traffic congestion in and around the facility. Inbound/outbound truck traffic from the north would interfere with the car department and mechanical maintenance shop at the north end of the facility. Significant modifications to the existing facility would be required as part of Alternative 2 to prevent gridlock in the facility and surrounding area. Trains are built on the northern ladder tracks of the facility and the proposed Alternative 2 parallel road would route trucks in conflict with on-the-ground switchmen and mechanical forces in an active rail corridor A parallel access road would put constraints on facility infrastructure Significant truck traffic backup predicted with this option due to anticipated challenges with bi-directional traffic along the proposed route in and out of the facility Potential impacts to Sound Transit Link Light Rail bridge as well as the S. Boeing Access Rd Overpass to accommodate this option. Alternative 3 is BNSF's preferred alternative. Alternative 3 would have the least impact on current trucking and transload operations at the facility. Maintains existing and consistent access to on and off ramp highway infrastructure while reducing truck impacts on the local road network and Allentown residents. Creates simplified opportunities to reconfigure the south end portion of the facility as part of the city's project scope with	

- Avoids residential neighborhoods in Allentown to the west and residences off of S 129th St to the east.
- Prevents conflicts with both facility operations and rail traffic presented with other alternatives. This alternative does not provide the same level of conflict to existing operations as other alternatives do.
- Avoids building new structures over BNSF right-of-way which would put constraints on facility operations and infrastructure.
- 4. Alternative 4 & 5

Alternative 4 & 5 requires more information.

- Alternative 4 & 5 is not feasible as an option as preliminarily presented.
- Additional questions and design considerations need to be addressed prior to determining the full viability of the alternative.
 - What will the roadway geometry and verticle profile on the proposed structure in Alternative 5 be that would allow trucking operations in all weather conditions?
 - Does the alternative propose to shift truck traffic from one residential area to another?
 - If either alignment requires the construction of a new bridge over BNSF right-of-way, what will the impacts of this structure be during and after construction?
 - Any new structure must clear span the right-of-way to avoid facility operations and infrastructure constraints.
- III. Additional Design Considerations

BNSF's key areas of concern can be summarized as follows:

- A. What are the impacts to existing operations at the Hub facility? Safe and efficient ingress and egress of trucking operations is most important to the selected alternative. BNSF's ability to serve the Puget Sound Region is directly linked with the fluidity of trucks accessing the facility.
- B. Where trucks go when they enter or exit the facility matters. The facility is wholly designed and flows around the existing south end gate location. Changing the location of the entry

			gate, especially on proposed Alternatives 1 and 2 which move the gate to the north end of the facility, would require substantial changes to the internal layout and operations of the Hub facility in order to maintain fluidity and avoid network congestion. C. Alternative 4 & 5 appear to move trucks from one neighborhood to another, creating new conflict points for neighboring communities both during construction of the alternatives, and as a permanent condition. IV. Conclusion Maintaining fluid truck access to the nations rail network is of critical importance to BNSF, the region, our service partners, and our customers. We appreciate the careful consideration of the comments above and look forward to the continuing discussion on alternatives for the area. BNSF Railway is a key stakeholder in the decision and is a willing partner in the ongoing process to determine a viable solution that is mutually beneficial for BNSF's operations, the City of Tukwila, and Allentown residents.		
29	5/27/2023	Online	YES to alternatives #1 and #2. NO to alternative #3,#4 and #5	Allentown	
30	5/27/2023	Online	Airport Way option is the most cost effective and logical solution. It is also the farthest option from the Duwamish River. Noise walls serve a purpose but are usually ugly in neighborhoods. What is BNSF's currant use of gate on Airport Way? The grade of the hill is severe for options 4 and 5 I expect the EIS to research the PAH chemicals in truck exhaust that fall onto streets, roofs, storm sewers and directly into the Duwamish river. The health effects to humans and the river and the wildlife including salmon that live there. I expect noise, human health and safety, air pollution, environmental justice, salmon, tribal and traffic impacts all studied.	Allentown	

31	5/29/2023	Online	Why isn't 51 pl so on the map? It would show how close the roads you are planing to the residents homes. The plan is to get the trucks off of both 124th and 50th pl so so let's do that without building bridges and ramps. Alternative 1 is the best choice. How close to homes plans 3,4 and 5 will be. Noise, pollution, bright lights and a wall. Bridges would disturb the environment.	51st pl so should be showing on your Alternate map plan as our homes will be greatly affected. People living on 51st pl so and 50th pl so should have had better communication preferably in person as we are the ones with the most impact.	Allentown	
32	5/30/2023	Online	I attended the community meetings for both phase one and two and was surprised at the lack of BNSF public participation in this project - including the emergency work to the 42 AVE S bridge work that was necessary because of activity directly related to BNSF. Hopefully some teamwork between our officials (city, county, state and federal) can work together to bring BNSF to the table. That said, I strongly prefer alternatives 1 and 2 because in my view they do the most to reduce the adverse impacts to communities both in Tukwila and West hill (where I live). We have endured the noise, pollution and traffic safety impacts related to the BNSF multi modal facility for decades and these alternatives address the baseline issues - including the acute level of truck traffic that has resulted following the 42 AVE S bridge closure. Our neighborhoods have deserved better and these alternatives go the farthest in improving conditions where we live. Alternatives 3,4 and 5 all had issues described at the May 23 community meeting that appeared to question their viability. Additionally, alternatives 4 and 5 appeared to favor local government spending for infrastructure in order to reduce or eliminate any investment from BNSF. Let alone not explaining whether the construction of new over freeway overpasses is even possible		West Hill	

			considering the grade differences (The hill to access SR 900 from BNSF). The baseline impacts to neighborhoods should be studied in fine detail in order to know what any alternative does to mitigate the noise, pollution and traffic safety issues - We should see improvements over the no-build alternative that we presumably may have been stuck with had the 42 AVE S bridge not been damaged. Other government agencies and utilities will need to be involved with alternatives 1 and 2. I hope they will be more cooperative than BNSF has been. I would hope that electrification of the truck fleet moving freight in and out of BNSF is addressed - Are there federal or state programs that may be helpful? Even electrification of the locomotives used in the BNSF yard here would be a great improvement.		
33	5/30/2023	Online	Any data discussing the above items should be a part of the EIS. I'm concerned with safety of the residents of Allentown and the noise and pollution of semi's being routed through a residential area. I believe Alternative #1 is the best solution with the residents of Allentown in mind. Which also routes the trucks to utilize the areas existing infrastructure, was the lowest cost and time commitment to build. Routing BNSF trucks through residential areas. Safest truck route to commuters and pedestrians. Noise pollution caused by trucks to residents living in the area.	Allentown	
34	5/30/2023	Online	I support ALT 5. It provides new I-5 ramps for north and south, which are very much needed. And from what it looks like, ALT 5 won't impact S 129th street traffic. The community really needs ALT 5, the current I-5 ramps are awful. Please consider adding a new bridge crossing the Duwamish by the	Skyway	

			Tukwila Community Center. That bridge has been worn down by all			
			the trucks.			
35	5/30/2023	Online	Alot of truck noise to route 50pl 51 st And some of them drive fast too not safe for people Turn around We can move all of them to route 1 -2 Reduce the noise !!!!	50 PI		
36	5/30/2023	Online	Alt 1 and 2 do not go through any residential area. They also do not require new bridges or Screen wall. The map is not accurate enough for 3,4,5 . I live on 51st PL and the route is not clearly Identified. The rail yard does not comply with noise. They make noise throughout the night. Now you want to run trucks right on 51st. The noise and vibrations can be intolerable. Alt 1 and 2 looks to be cheaper. Alt 3 new road way new bridge new noise wall and through residential area. Alt 4 Widened road, new ramp, new noise wall new connection to 900 and through residential area. Alt 5New ramp, new noise wall, new bridge new ramp and through residential area. Al 1 and 2 is minimal construction. Only a new check in for BNSF. Alt 3, 4, and 5 are also closer to the river. Construction will need extra precautions taken to protect our waterway. increasing the cost to the project. Unfortunately accidents do happen. To Protect waterway Alt 3, 4, and 5 should be eliminated I really think you should consider the residents. The extra traffic, noise and possible accidents. The cost and longevity of each alternative should also be considered. In these times we need to look for the cheapest and best alternatives. Alt 1 and 2 are clearly the better choices. If 3, 4, and are considered these maps should be reprinted more accurately so the neighborhood could make a better choice.		Allentown	
37	5/30/2023	Online	I definitely like the idea of alt #1 and alt #2 route because this will help the traffic in the community as well as be less disturbing during the night time. A speed limit for trucks because at night they drive down the street so fast over the speed limit, it shakes my whole house.		Allentown	Wa a
38	5/30/2023	Email	Hello,			Yes

			 Dodge Construction Network wants to ensure we have the most complete and accurate information regarding "Allentown Truck Reroute Project " that is bidding on "06/01/2023". DCN is requesting the following information Planholders list/bidders list or mandatory prebid list Confirm that the bid date and time listed above are unchanged Any addenda that have been released, please attach them to this response Construction cost estimate or a construction cost range for the project Please send the information via email to XXX or via fax to XXX. Thank you for your time and assistance. 			
39	5/31/2023	Online	As home owner on 50th Place South, this street so noisy and the house was shaking and to dirty, I want reroute the truck route to other large street to keep my house and our community will not damage in future.		Tukwila Park	
40	5/31/2023	Online	The route alternative is really good idea. We've been hoping so long time to change the routine. This is residential area kids walk around elderly need to walk around without noise and traffic Should not be track Route. Too much noise always bouncing it's not quiet or safe for walking for resident kids.		12517 51st PI close to BNSF	
41	5/31/2023	Online	Not impressed with option numbers 4 and 5. The costs are outlandish and the same problems would occur that we have now. The hill is a detriment, new ramps and bridges are so expensive, using the south entrance of the yard the trucks would still sneak through the residential neighborhood avoiding the hill, and the options are close to the river. Option 3 - seems like it would be more logical to use one of the gateway drive roads than building a new one 100 feet from it. Do you really listen to scoping comments from the beginning? Options 2 then 1 are the most logical, cost effective and furthest from the river.	Use satellite maps for group discussions.	Allentown	

			River, salmon, eagles, otters, air pollutions, storm water drainage, truck exhaust toxins, traffic impacts, trees, noise, tribal, tire wear chemicals, PAH carcinogenic chemicals, 6PPD issues, and human toxins related to excessive 3000 trucks a day going through a residential area. (Whether it was 3000 or 300 trucks it would be too many in a residential neighborhood.)		
42	5/31/2023	Email	My home on 51st Pl So, which does not show on the Alternative proposal, rattles and you can feel and hear the kaplunks every time a truck drives over the filled potholes that are making indentations in the road. This is coming from 50th Pl So. If either proposal 3, 4 or 5 is selected the rattling, noise and kaplunks would be worse as they would be right across the street. A wall would not stop that. The home that is on the same side as the BNSF would be greatly affected, how would you protect them? The turn off of 129th overpass would be too sharp. The trucks are bigger and longer than they were years ago. If any one of 3, 4 or 5 are chosen, Tukwila or BNSF should buy out the homes on 50th Pl So and 51st Pl So and also the homes on 124th between 50th Pl So and 51st Pl So and any others that would be affected. Please choose Alternative 1 or 2.	51st PI S	Yes
43	5/31/2023	Online	I personally believe that the only feasible, common sense one is Alternative #2, going in off of Airport Way into the north end of BNSF. It is the one with the least obstacles by far. There is already an existing road going into the rail, all roads leading to it are through industrial areas, no bridge needs to be built. The BNSF saying it is too spendy to rearrange the yard is just an excuse to not do anything. The \$\$ you would spend on any of the other options could easily pay for them to move a few things around. There is no brick and mortar buildings in the way, it is all things that can be driven to a new location or picked up with a back hoe. Don't be fooled into thinking it	Allentown	

			is a huge hardship for the BNSF, they just don't want to be bothered to be good neighbors. #1 Is utility corridor needing the right of way from City of Seattle and I doubt they will give it. Plus it comes out onto East Marginal Way at a place without much room #3 has way too many obstacle involving right of ways, too much traffic there on Interurban already plus having to build a bridge over the Duwamish and landing on a small bank on the other side. There is also the push back from business owners who have lawyers waiting to litigate that option. It takes soooo many years to get a bridge built. Not a viable option. Too spendy also. #4 & 5 seem a bit silly to me. Looks like they are stretching reality just to keep the entrance into the BNSF in the same location. No way is anyone spending the money involved in rebuilding the existing overpass, widening it over Interstate 5blah blah blah. Those alternatives seem a bit crazy to me. Plus the trucks are still in the neighborhood, just entering from a different direction but having the ability to leave out the way they are now. 1) impacts on surrounding area that trucks travel through I have no personal ideas on what to analyse. The trucks need to be out of a residential neighborhood. There are other alternatives. Period.		
44	5/31/2023	Email and Letter	Re: Comments on the Second Phase of the Scope of the Environmental Impact Statement for the Allentown Truck Reroute Project (the "Project") Dear Mr. Hafs: This firm represents Strander Family, LLC I and Strander Family, LLC II (the "Strander Companies"), owners of six properties leased to four commercial tenants along 48th Avenue South, in matters related to the above-referenced Project. We write on the Strander Companies' behalf to submit comments on the second phase of the scope of review under the State Environmental Policy Act ("SEPA") being carried out by the City of Tukwila (the "City") for the Project. As		Yes*

outlined in the Strander Companies' prior comments on the Project on March 15, 2023 and August 25, 1998, incorporated and resubmitted in full as part of this comment letter, the City's proposed Alternative 3, which would reroute Burlington Northern Santa Fe ("BNSF") along 48th Avenue South, would cause significant and disproportionate impacts to the environment, local businesses, and the community.

As was discussed at the City's May 23, 2023 Community Meeting, proposed Alternative 3 is the only alternative currently being considered that would require an entirely new bridge over the Duwamish River.1 Even without taking into account the financial and engineering considerations of such an undertaking, the construction of a new bridge will negatively impact the riparian habitat. Runoff and vibration from cars and trucks crossing the new bridge will also significantly impact water quality and the vitality of the Duwamish ecosystem including, among other key species, endangered salmonoid species and nearby osprey and eagles that rely on fish migration for food. While these impacts on their own warrant the City removing proposed Alternative 3 from consideration, when considered cumulative with the impacts from the existing I-5 bridge located approximately 350 feet south, proposed Alternative 3 and its impacts to the Duwamish River and surrounding ecosystem are untenable. As explained by the Muckleshoot Tribe in 2000, any alternative that involves construction of a new bridge over the Duwamish River will have problematic direct and indirect impacts on salmon spawning and migration routes and would violate the Muckleshoot Tribe's federally protected treaty fishing rights. See Letter from Tribal Attorney K. Allston dated April 14, 2000.

Proposed Alternative 3 is also the only current alternative that would require a significant government taking of local family-owned private property, the very community that the City represents. Again, even without taking into account the financial considerations of such an undertaking, which are likely substantial given the commercial and industrial businesses along 48th Ave. S., the loss of commercial and industrial operations will affect the long-term economic prospects of the City and its residents.2 In addition, construction of a 48th Ave. S.

			Bridge conflicts with the community's existing Green River Trail that runs along the western portion of the Duwamish River and the City's goal of increasing public and community connectivity to the Green/Duwamish River. See Tukwila Comprehensive Plan, Policy 6.1.5. Nor is proposed Alternative 3 viable when considering the traffic impacts to 48th Ave. S., the surrounding arterial system and the safety of drivers and City residents. 48th Ave. S. is not a designated arterial and proposed Alternative 3's reroute and repeated right turns would predictably create a traffic back up for BNSF trucks and other vehicles on 48th Ave. S. These traffic impacts would be compounded with the new traffic signal(s) that would be required on Interurban Ave. S. Such traffic would also have numerous additional impacts to the built environment and access to nearby businesses, including associated noise with increased truck traffic. While this letter and the Strander Companies' prior comment letters, incorporated fully herein, have highlighted several of the adverse impacts to the natural and built environments, we trust that the City will complete a full analysis of all elements. Doing so will reveal that proposed Alternative 3 or any alternative that considers 48th Ave. S. for the reroute would unreasonably and disproportionately harm the environment and should not be considered. *Additional attachments available in PDF	
45	6/1/2023	Online	I am a strong proponent of Route #2. Cleanest design, least amount of disruption, no bridges to build, no trees to be cut, no nature to be displaced. Most efficient and cost effective for the truckers (especially for independents).	Allentown - 44th Ave S.
46	6/1/2023	Online	Route #1 concerns me for the potential of disturbing the Duwamish Hill Preserve, wildlife and wetlands. The community already fought to save the preserve, let's not endanger that hard fought victory for nature protections.	Allentown - 44th Ave S.
47	6/1/2023	Online	I do not like the proposed alternative Routes 3, 4 & 5. They are complicated and will be INCREDIBLY disruptive for the neighborhood and its residents. The opposite of the intended goal! Extended	Allentown - 44th Ave S.

			periods of construction - building bridges, sound walls, cutting down long established trees, imminent domain issues, etc. Groundwater considerations.		
48	6/1/2023	Online	Project 2 will not affect the residential area and environment and is also less expensive compared to other projects .So I like Alternative 2.	Allentown	
49	6/1/2023	Email	Two immediate impressions from looking at the five proposed alternatives are: 1) There are significant logistical, access, and permitting barriers for all of them - and that I hope are not going to be used as an excuse to continue to do nothing about getting the truck traffic out of this residential neighborhood. Effort is going to be needed for a long-overdue solution and everyone knows this isn't going to be easy. 2) Proposed Alternatives #1 & #2 have the least number of barriers (on paper), but these include the need for BNSF to change configurations on their property and they have been non-participants, even when asked, to this point, as well as the potential for the Sound Transit BAR (Boeing Access Road) station construction interfering with the proposed routes. The North entrance proposed alternatives do the best job of removing the truck traffic from the neighborhood - which is the neighborhood's ultimate goal. In prior studies the north end options have been the most expensive, and concerns about interference with the utilities corridor and wetlands in these areas, as well as the need for easements from public entities and private property owners have been cited as barriers, but it appears that this time these would be less expensive than the other proposed alternatives because they do not include building a bridge and doing major road re-configurations. I would like to see the costs associated with each of these options as well as proposed timelines because of permitting, easement, etc. issues that would need to be addressed with each one. I would like to know what, if any, impact the Sound Transit BAR station construction will have on the north access		Yes

			options.		
			If Alt. #1 includes getting rid of the Seattle Police Dept. firing range, that would be a wonderful and welcome benefit to both the Allentown and Duwamish neighborhoods. It is almost impossible to enjoy visiting and walking around the Duwamish Hill Preserve without hearing gunfire. I hear it at all hours of the day from my home in Allentown. I have to warn everyone I take there that yes, you are hearing gunshots, and no, we are not the targets. This long standing public private partnership has created and preserved an important space that is sacred to the Duwamish and Coast Salish peoples and has been designed to be an outdoor classroom for students to learn about local history and biology. It is unnerving and stressful for teachers/parents to take students into this space and deal with the sound of gunfire while trying to conduct lessons.		
50	6/1/2023	Online	Thank you for the opportunity to comment. I like options 1 or 2. The other options are too complicated and would	Allentown	
50	6/1/2023	Online	be too costly and take to much time to achieve with additional ramps and bridges etc. With options 1 or two there could probably be just a new entry/ exit control gate house and maybe scales relocated as needed at the north end with the remainder of the offices and maintenance facilities staying as is. There will undoubtedly be more internal truck traffic which will add to the already significant truck, top loader and train noise within the yard that impacts all of the 60 +/- homes, at all hours, within the influence zone along the BNSF boundary with Allentown. The truck and train noise, back up beepers, train tremors and light pollution should all be looked at in terms of ways to minimize the impact to the immediately adjacent homes. Lower the lights and add cut off shields, convert all yard equipment to electric, change out all on site back up safety beepers to the minimum required decibel levels similar to the newer low level beepers on local neighborhood delivery vans, get a grant to build a concrete noise abatement wall along the boundary similar to what is standard practice where the light rail runs adjacent to neighborhoods. Better yet, find a completely new location for this entire facility which should	Allentown	

have never been allowed to evolve this level in this location. Convert	
the area into a community open space amenity with active and	
passive recreation, wetlands and trails!	

ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



SCOPING PHASE 2

COMMENT FORM

The formal EIS scoping comment period is May 3rd through June 1st, 2023

The existing route, in addition to five proposed route alternatives, will be studied in the EIS to determine potential impacts on the built and natural environment. Tell us your thoughts on the alternatives and other topics that should be studied.

All comments must be written and submitted within the formal scoping comment period.

Other ways to provide a formal comment:



Submit a comment on our project website



Email your comment to AllentownTruckReRoute@TukwilaWA.gov



Mail your comment to Mark Hafs 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188



Mailer comments must be postmarked by June 1, 2023

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- NC

NAME

COMMENTS

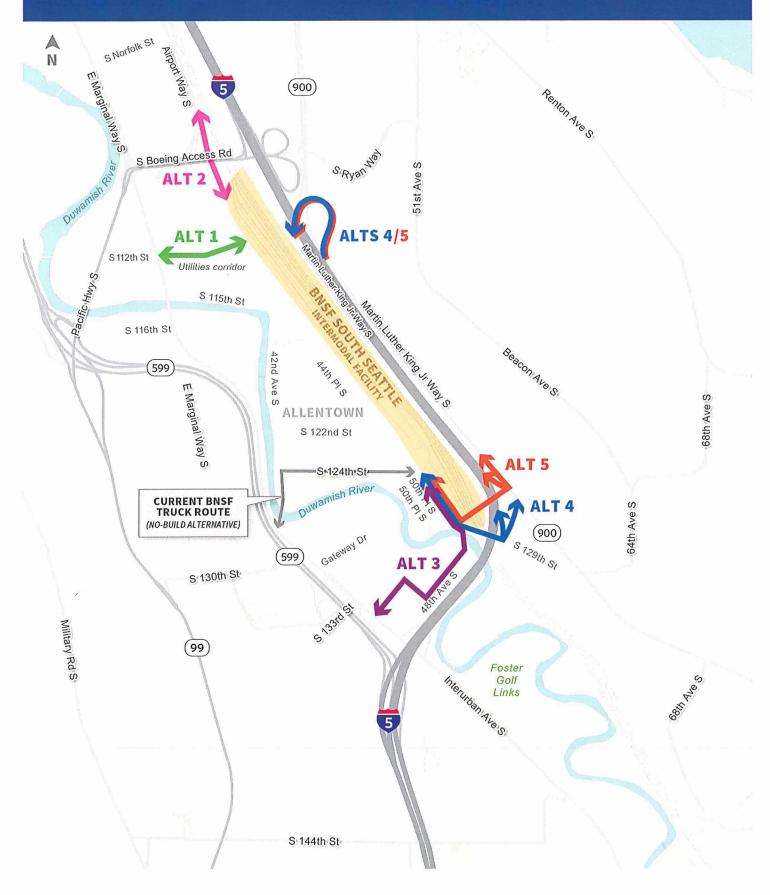
Share your input on what issues we should analyze in the EIS. Example: There is a 100-year-old tree at the intersection of X and Y that should not be disturbed during the rerouting process.

Do you have questions or concerns regarding the Environmental Impact Statement (EIS) process?

What neighborhood do you live in? (Optional)

Please reference the five proposed truck alternatives and current route in the following map when providing written comments.





ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



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SHARE YOUR INPUT

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YES

NO

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COMMENTS

Share feedback about the routing alternatives.
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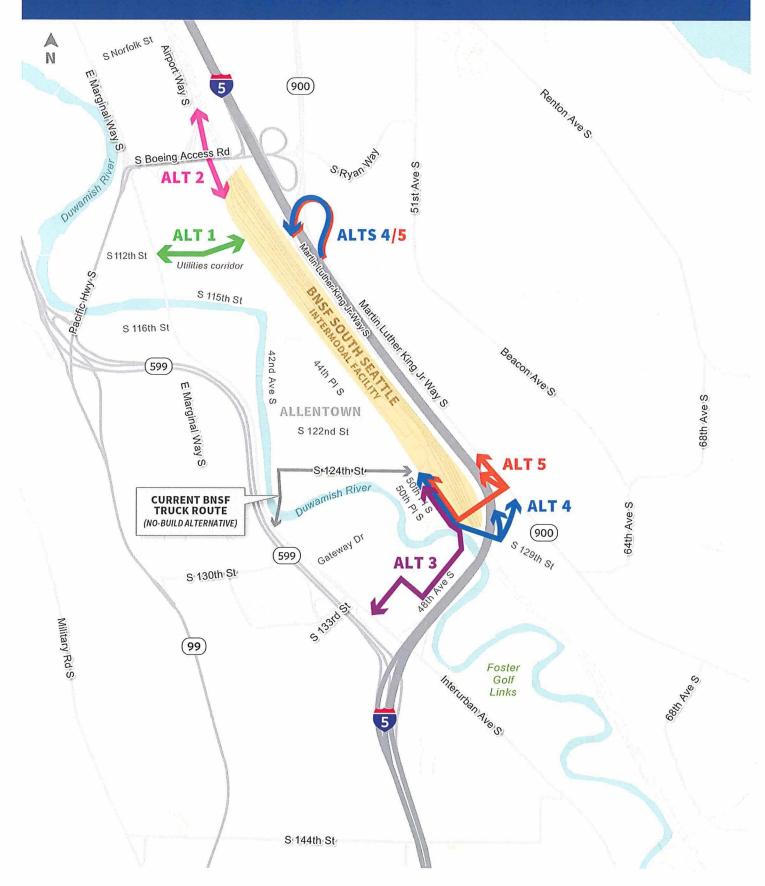
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SHARE YOUR INPUT

NAME

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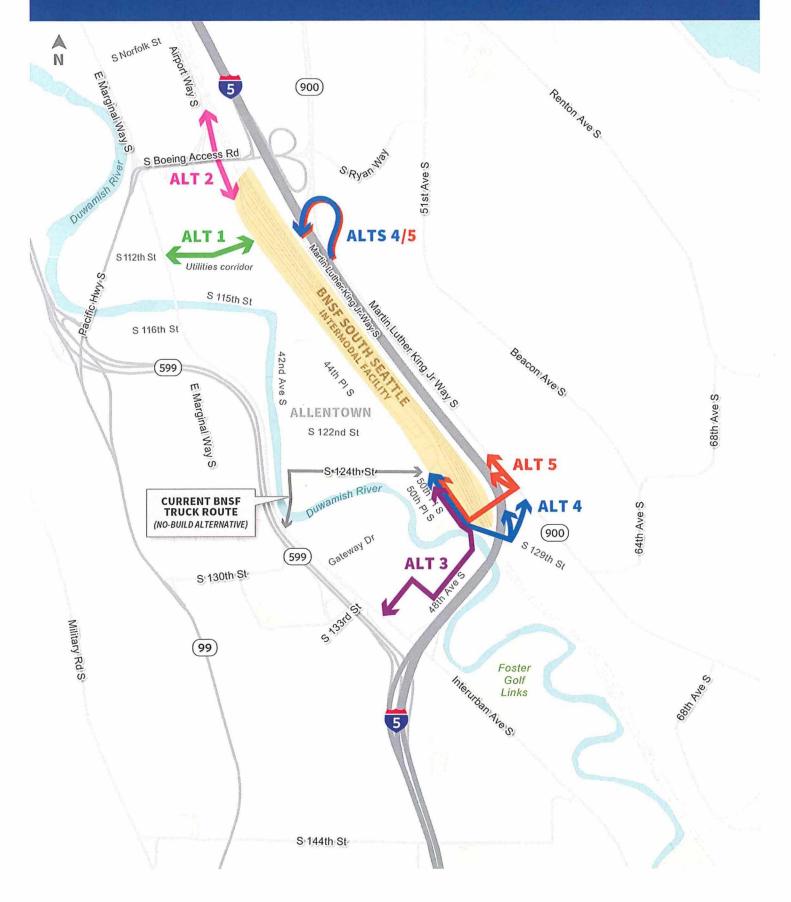
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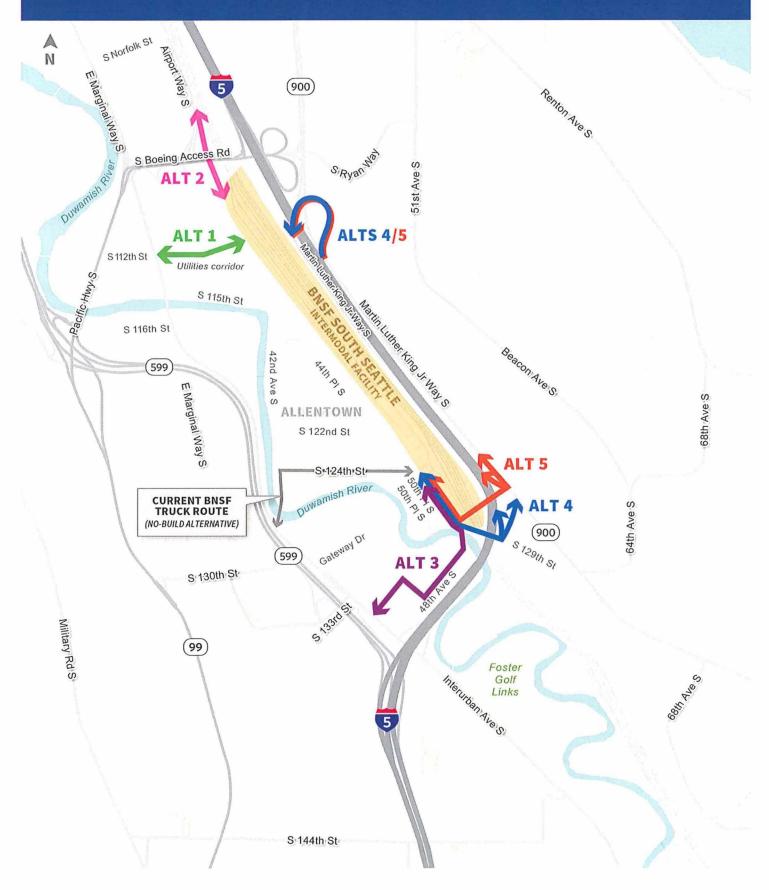
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SHARE YOUR INPUT

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Please reference the five proposed truck alternatives and current route in the following map when providing written comments.





ALLENTOWN TRUCK REROUTE PROJECT **ENVIRONMENTAL REVIEW PROCESS**



SCOPING PHASE 2

OMMENT FORM

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All comments must be written and

submitted within the formal scoping

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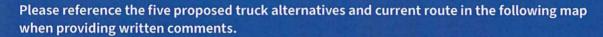
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5 Are there any protected wetlands on
this rente!

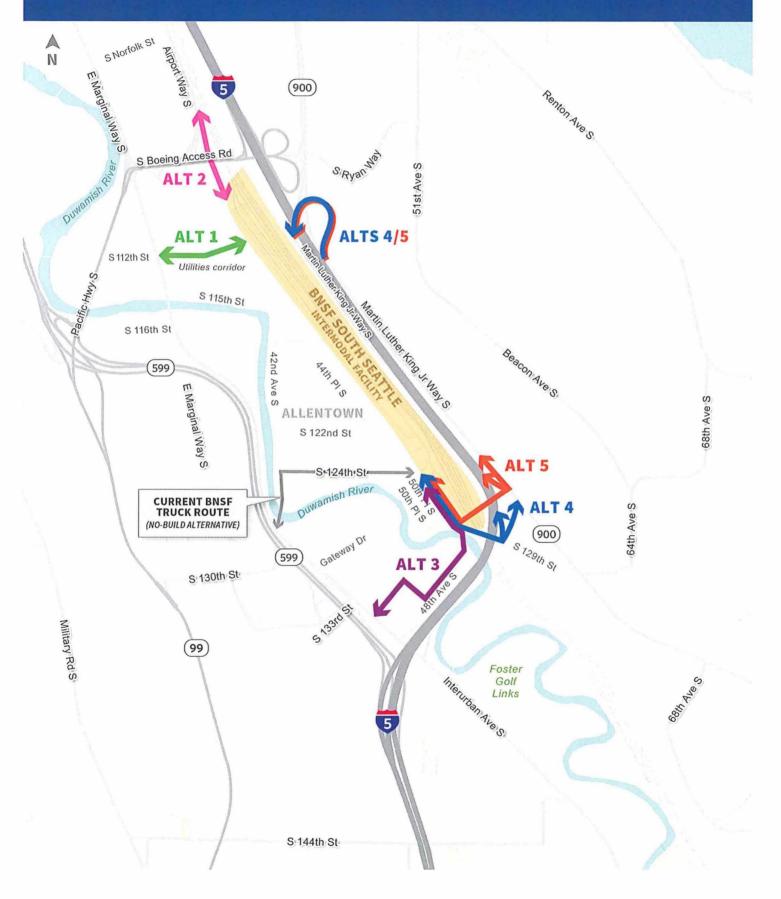
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should not be disturbed during the rerouting process.

Do you have questions or concerns regarding the Environmental Impact Statement (EIS) process?

What neighborhood do you live in? (Optional)







ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



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JOIN OUR MAILING LIST? **▼YES** □ NO



Mail your comment to Mark Hafs 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188



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SHARE YOUR INPUT

EMAIL	

COMMENTS

NAME

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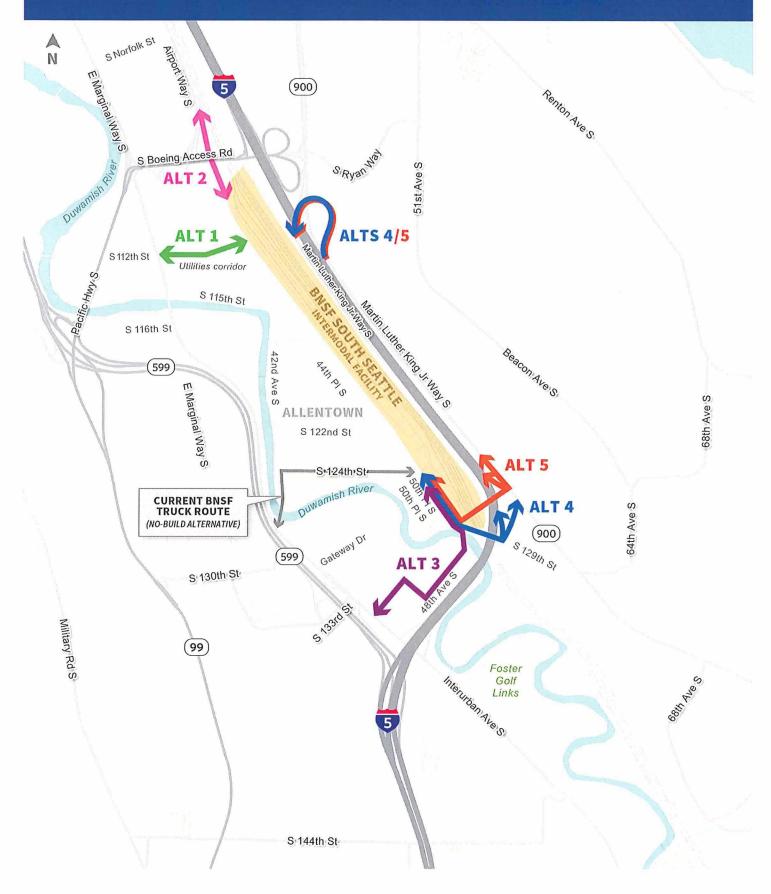
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What neighborhood do you live in? (Optional)

Please reference the five proposed truck alternatives and current route in the following map when providing written comments.





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COMMENTS

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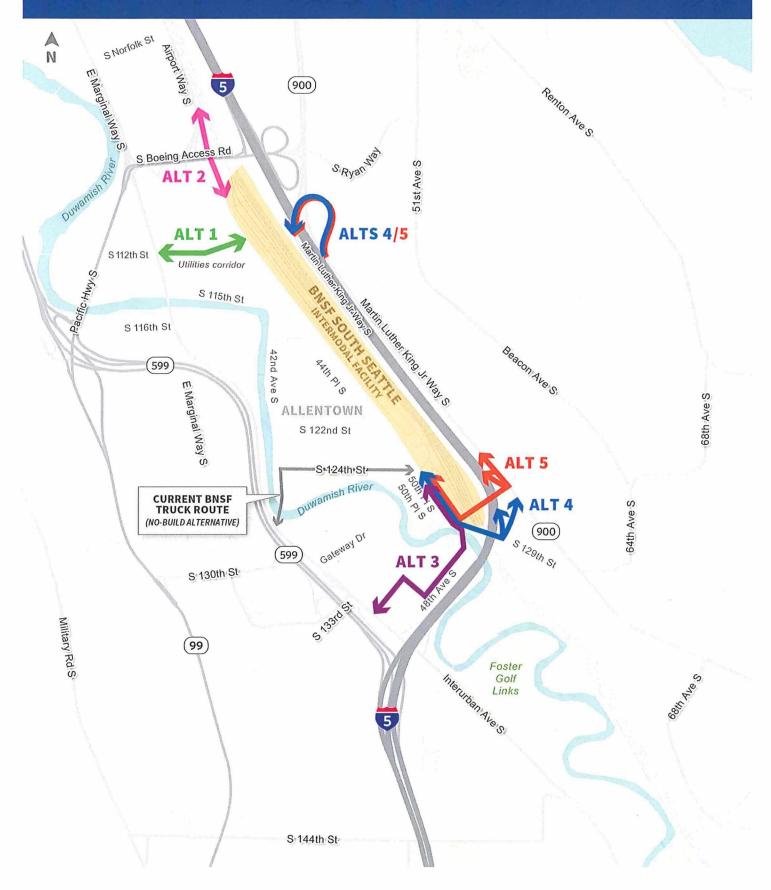
Authory Quest

What neighborhood do you live in? (Optional)

Turn over to view the Proposed Alternatives map

Please reference the five proposed truck alternatives and current route in the following map when providing written comments.





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SHARE YOUR INPUT

NAME	EMAIL	

COMMENTS

Share feedback about the routing alternatives. Example: I'm concerned with the potential cost of Alternative X because of Y.

PREFER ALT 2 -

REDUCES NOISE AND SAFEY

IMPACTS IN OUR

NEIGHBORHOOD. ALT Z ALS

APPEARS TO BE THE CASIEST

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Share your input on what issues we should analyze in the EIS. Example: There is a 100-year-old tree at the intersection of X and Y that should not be disturbed during the rerouting process.

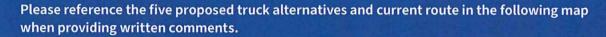
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NOISE AND SATETY ARE #1

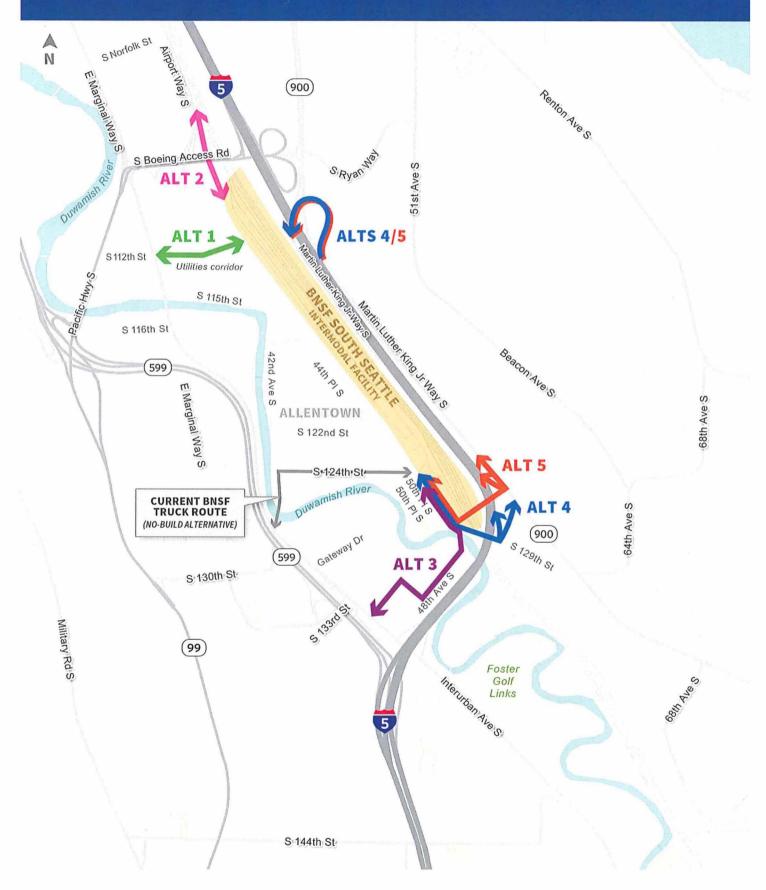
Do you have questions or concerns regarding the Environmental Impact Statement (EIS) process?

What neighborhood do you live in? (Optional)

ALLGNITOWN







Dear Mark Hafs

Attn:
City of Tukwila
6300 Southcenter Blvd. Ste. 200
Tukwila, WA 98188

We are the tenants of the Empire View Mobile Homes located near S. 129th St. We are writing this letter to request you to re-route the trucks away from S. 129th St and other residential neighborhoods. Several of us have made concerns regarding the trucks using this route. Please see details below:

- S. 129th St is currently on a hill. We have been concerned as truck drivers have been driving really fast down this hill. We are afraid that one day they may swerve into the houses. Even during rainy days or snow, these trucks are still going downhill fast.
- There are local children in this neighborhood. Trucks driving down this hill
 may not see children and or not be able to break as fast due to the steep
 slope.
- We are worried about the amount of trucks driving past this street posing a
 direct threat to human health and the environment. This causes parents not
 wanting their children to play in the front yard or elders going on their walks.
- Residents are not able to be well rested due to the noise and vibrations caused by the numerous trucks rumbling up and down the street.
- Pavements and crosswalks are ruined by the trucks causing multiple pot holes on this street. Uneven pavements pose a fall risk to the residents.
- Everytime a truck drives on this hill, it makes the homes in the neighborhood vibrate very similarly to a small earthquake.

We hope that you take our concerns regarding this matter seriously and re-route the trucks away from S. 129th St and away from residential neighborhoods. Thank you for your consideration, we will be glad to answer any questions you have.

Sincerely.

Tenants of the Empire View Mobile Home Park.



05/24/2023

To whom It May Concern

It was noted by Baker Commodities that there are some changes to the previous reroute of truck traffic through Allentown. Also a comment in last night's meeting about removing all trucks from access to 124th and the 42nd Ave Bridge. Our concern is that you are not taking into consideration the Baker Commodities truck fleet in your conversations when looking at or developing new truck routes. Baker does not run the same type of equipment as what is going into or out of the B&N facility. Our truck and trailer configurations are much longer at 68 feet.

Alternative Routes #1, #2 look to be the best option for removal of B&N traffic but does nothing for Baker traffic. Same goes for option #5 but putting in another bridge coming off MLK does not look feasible due to grade and winter weather issues. Same goes for option #4. The 129th bridge is bad enough when we have snow or freezing weather which opens up 42nd Ave bridge and 124th as alternatives during snow or freezing weather.

Alternate route #3 our concern is design and how it would accommodate current businesses along this route and enable our equipment to use this access.

Baker Commodities currently remains neutral but we have concerns that the City is not considering Baker equipment when discussing alternative routes

Division General Manager

Baker Commodities Inc.
Seattle Division

PO Box 58368

Seattle, WA 98138



DATE: MAY 26th, 2023

SUBJECT: TUKWILA, WA: ALLENTOWN TRUCK REROUTE EIS ALTERNATIVES

I. Introduction

The South Seattle Hub (SSH) in the Allentown neighborhood of Tukwila, WA is an important economic link to the Puget Sound Region. It serves as an inland port, providing domestic intermodal transloading between truck and rail. The ability for trucks to access the facility both safely and efficiently is essential for consumers and industry throughout the region. BNSF recognizes the City of Tukwila is developing an Environmental Impact Statement (EIS) process to vet the alternatives to the 42nd Ave S bridge replacement. As a key stakeholder in the proposed project that contemplates potential reroutes to the truck traffic patterns relative to the South Seattle BNSF Intermodal Facility, BNSF Railway provides the following comments on the preliminary alternatives that are being considered.

II. Alternatives

1. Alternative 1



Alternative 1 is not feasible.

- Trucking entrance/exit functions are handled at the southern end of the facility.
- The north end exists currently as the most congested part of the facility.
- Shifting traffic to the north would mix incoming and outgoing trucks with live transloading operations, creating both safety concerns and traffic congestion in and around the facility.
- Inbound/outbound truck traffic from the north would interfere with the car department and mechanical maintenance shop at the north end of the facility.
- Significant modifications to the existing facility would be required as part of Alternative 1 to prevent gridlock in the facility and surrounding area.
- Additional concerns integrating truck traffic with an existing utility corridor due



to powerline clearances, weight restrictions, etc.

The alternative would require multiple left turns for trucks coming from I-5.

2. Alternative 2

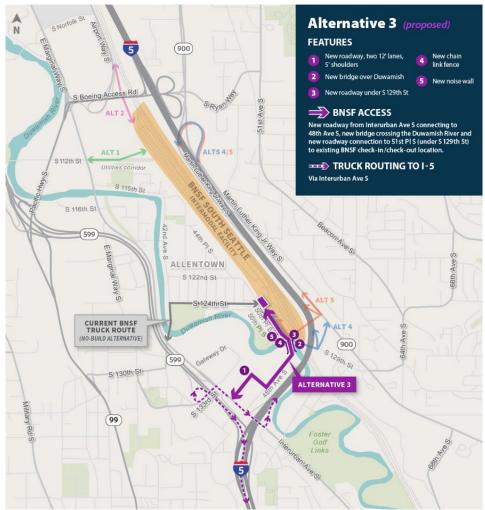


Alternative 2 is not feasible.

- Trucking entrance/exit functions are handled at the southern end of the facility.
- The north end exists currently as the most congested part of the facility.
- Shifting traffic to the north would mix incoming and outgoing trucks with live transloading operations, creating both safety concerns and traffic congestion in and around the facility.
- Inbound/outbound truck traffic from the north would interfere with the car department and mechanical maintenance shop at the north end of the facility.
- Significant modifications to the existing facility would be required as part of Alternative 2 to prevent gridlock in the facility and surrounding area.
- Trains are built on the northern ladder tracks of the facility and the proposed Alternative 2 parallel road would route trucks in conflict with on-the-ground switchmen and mechanical forces in an active rail corridor
- A parallel access road would put constraints on facility infrastructure
- Significant truck traffic backup predicted with this option due to anticipated challenges with bi-directional traffic along the proposed route in and out of the facility
- Potential impacts to Sound Transit Link Light Rail bridge as well as the S. Boeing Access Rd Overpass to accommodate this option.



3. Alternative 3



Alternative 3 is BNSF's preferred alternative.

- Alternative 3 would have the least impact on current trucking and transload operations at the facility.
- Maintains existing and consistent access to on and off ramp highway infrastructure while reducing truck impacts on the local road network and Allentown residents.
- Creates simplified opportunities to reconfigure the south end portion of the facilility as part of the city's project scope with minimal changes to existing operations.
- Avoids residential neighborhoods in Allentown to the west and residences off of S 129th St to the east.
- Prevents conflicts with both facility operations and rail traffic presented with other alternatives. This alternative does not provide the same level of conflict to existing operations as other alternatives do.

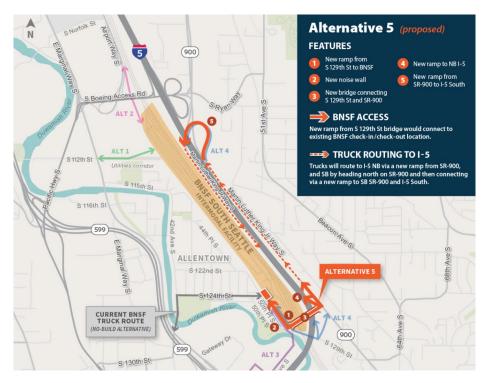


 Avoids building new structures over BNSF right-of-way which would put constraints on facility operations and infrastructure.

4. Alternative 4 & 5







Alternative 4 & 5 requires more information.

- Alternative 4 & 5 is not feasible as an option as preliminarily presented.
- Additional questions and design considerations need to be addressed prior to determining the full viability of the alternative.
 - What will the roadway geometry and verticle profile on the proposed structure in Alternative 5 be that would allow trucking operations in all weather conditions?
 - Does the alternative propose to shift truck traffic from one residential area to another?
 - If either alignment requires the construction of a new bridge over BNSF right-of-way, what will the impacts of this structure be during and after construction?
 - Any new structure must clear span the right-of-way to avoid facility operations and infrastructure constraints.

III. ADDITIONAL DESIGN CONSIDERATIONS

BNSF's key areas of concern can be summarized as follows:

- A. What are the impacts to existing operations at the Hub facility? Safe and efficient ingress and egress of trucking operations is most important to the selected alternative. BNSF's ability to serve the Puget Sound Region is directly linked with the fluidity of trucks accessing the facility.
- B. Where trucks go when they enter or exit the facility matters. The facility is wholly designed and flows around the existing south end gate location. Changing the location of the entry gate, especially on proposed Alternatives 1



- and 2 which move the gate to the north end of the facility, would require substantial changes to the internal layout and operations of the Hub facility in order to maintain fluidity and avoid network congestion.
- C. Alternative 4 & 5 appear to move trucks from one neighborhood to another, creating new conflict points for neighboring communities both during construction of the alternatives, and as a permanent condition.

IV. CONCLUSION

Maintaining fluid truck access to the nations rail network is of critical importance to BNSF, the region, our service partners, and our customers. We appreciate the careful consideration of the comments above and look forward to the continuing discussion on alternatives for the area. BNSF Railway is a key stakeholder in the decision and is a willing partner in the ongoing process to determine a viable solution that is mutually beneficial for BNSF's operations, the City of Tukwila, and Allentown residents.



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May 31, 2023

Via U.S. Mail and Email

Mark Hafs 6300 Southcenter Blvd., Suite 200 Tukwila, WA 98188

Re: Comments on the Second Phase of the Scope of the Environmental Impact Statement for the Allentown Truck Reroute Project (the "**Project**")

Dear Mr. Hafs:

This firm represents Strander Family, LLC I and Strander Family, LLC II (the "Strander Companies"), owners of six properties leased to four commercial tenants along 48th Avenue South, in matters related to the above-referenced Project. We write on the Strander Companies' behalf to submit comments on the second phase of the scope of review under the State Environmental Policy Act ("SEPA") being carried out by the City of Tukwila (the "City") for the Project. As outlined in the Strander Companies' prior comments on the Project on March 15, 2023 and August 25, 1998, incorporated and resubmitted in full as part of this comment letter, the City's proposed Alternative 3, which would reroute Burlington Northern Santa Fe ("BNSF") along 48th Avenue South, would cause significant and disproportionate impacts to the environment, local businesses, and the community.

As was discussed at the City's May 23, 2023 Community Meeting, proposed Alternative 3 is the only alternative currently being considered that would require an entirely new bridge over the Duwamish River. Even without taking into account the financial and engineering considerations of such an undertaking, the construction of a new bridge will negatively impact the riparian habitat. Runoff and vibration from cars and trucks crossing the new bridge will also significantly impact water quality and the vitality of the Duwamish

¹ While the "No Action" Alternative also technically requires replacement of the existing 42nd Ave. S. Bridge, that replacement is already funded and underway *regardless of the City's decision with respect to the Project*. As a result, the impacts associated with replacing the 42nd Ave. S. Bridge are not Project-specific and cannot be compared to proposed Alternative 3, which would require an entirely new bridge where one had not previously existed. Nevertheless, the Project and the viability of proposed Alternative 3 should be informed by the City's experience in replacing the 42nd Ave. S. Bridge and all of the logistical hurdles required to build a bridge across the Duwamish River, including the cost and construction delays experienced by the City to date.

Mr. Mark Hafs – City of Tukwila May 31, 2023 Page 2

ecosystem including, among other key species, endangered salmonoid species and nearby osprey and eagles that rely on fish migration for food. While these impacts on their own warrant the City removing proposed Alternative 3 from consideration, when considered cumulative with the impacts from the existing I-5 bridge located approximately 350 feet south, proposed Alternative 3 and its impacts to the Duwamish River and surrounding ecosystem are untenable. As explained by the Muckleshoot Tribe in 2000, any alternative that involves construction of a new bridge over the Duwamish River will have problematic direct and indirect impacts on salmon spawning and migration routes and would violate the Muckleshoot Tribe's federally protected treaty fishing rights. *See* Letter from Tribal Attorney K. Allston dated April 14, 2000.

Proposed Alternative 3 is also the only current alternative that would require a significant government taking of local family-owned private property, the very community that the City represents. Again, even without taking into account the financial considerations of such an undertaking, which are likely substantial given the commercial and industrial businesses along 48th Ave. S., the loss of commercial and industrial operations will affect the long-term economic prospects of the City and its residents.² In addition, construction of a 48th Ave. S. Bridge conflicts with the community's existing Green River Trail that runs along the western portion of the Duwamish River and the City's goal of increasing public and community connectivity to the Green/Duwamish River. *See* Tukwila Comprehensive Plan, Policy 6.1.5.

Nor is proposed Alternative 3 viable when considering the traffic impacts to 48th Ave. S., the surrounding arterial system and the safety of drivers and City residents. 48th Ave. S. is not a designated arterial and proposed Alternative 3's reroute and repeated right turns would predictably create a traffic back up for BNSF trucks and other vehicles on 48th Ave. S. These traffic impacts would be compounded with the new traffic signal(s) that would be required on Interurban Ave. S. Such traffic would also have numerous additional impacts to the built environment and access to nearby businesses, including associated noise with increased truck traffic.

While this letter and the Strander Companies' prior comment letters, incorporated fully herein, have highlighted several of the adverse impacts to the natural and built environments, we trust that the City will complete a full analysis of all elements. Doing so will reveal that proposed Alternative 3 or any alternative that considers 48th Ave. S. for the reroute would unreasonably and disproportionately harm the environment and should not be considered.

² While the City apparently has not confirmed the location of the portion of the "new" road that would cut North from 48th Ave. S. through existing commercial and industrial businesses, the City would also apparently need to widen the existing portion of 48th Ave. S. that is included in proposed Alternative 3. A current analysis of the funding needed to take all of the private properties necessary for proposed Alternative 3 should be performed as it is likely that such an analysis will reveal that proposed Alternative 3 is cost prohibitive.

Mr. Mark Hafs – City of Tukwila May 31, 2023 Page 3

Very truly yours,

Davis Wright Tremaine LLP

Clayton P. Graham

cc: Louise Strander

Enclosures:

March 15, 2023 Letter – Comments on the Scope of the Environmental Impact Statement for the Allentown Truck Reroute Project;

August 25, 1998 Letter to City of Tukwila Transportation Committee re: 48th Ave. SE Project;

April 14, 2000 Letter from the Muckleshoot Indian Tribe Office of the Tribal Attorney.



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March 15, 2023

Mark Hafs 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188 AllentownTruckReRoute@TukwilaWA.gov

Via U.S. Mail and Email

Re: Comments on the Scope of the Environmental Impact Statement for the Allentown Truck Reroute Project (the "**Project**")

Dear Mr. Hafs:

This firm represents Strander Family, LLC I and Strander Family, LLC II (the "Strander Companies"), owners of six properties leased to four commercial tenants along 48th Avenue South, in matters related to the above-referenced Project. We write on the Strander Companies' behalf to submit comments on the scope of review under the State Environmental Policy Act (SEPA) being carried out by the City of Tukwila (the "City") for the Project.

The current iteration of the Project is not the City's first time considering a potential alternative location for a primary vehicular access route to the Burlington Northern Santa Fe ("BNSF") Intermodal Facility, which currently runs along 42nd Avenue South (over the existing 42nd Avenue South Bridge) and South 124th Street (the "Current Route"). Most recently, the Project was studied in 2015-2016, though the effort was ultimately tabled. See BNSF Access Study Project Update, August 10, 2015; City of Tukwila Endangered Species Act Screening Checklist (December 6, 2016) ("2016 Checklist"). Two decades prior, in the late 1990s, the City similarly studied and considered alternatives for new access to the BNSF Intermodal Facility. See City of Tukwila Transportation Committee Agenda, March 10, 1998. One alternative considered was a route along 48th Avenue South (the "48th Ave. S. Alternative"). As the Strander Companies detailed then, the 48th Ave S. Alternative was (and is) costly compared to alternatives; would significantly disrupt existing businesses; and would severely and negatively impact traffic flow to and from I-5. In response to these concerns and others, the 48th Ave. S. Alternative was removed from the City's considerations. See Tukwila City Council Meeting Minutes, September 25, 2000. While the same concerns that caused the City to abandon the 48th Ave. S. Alternative remain and more have arisen since—the City has signaled its openness to reconsidering that route as a potential alternative for the Project.

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The Strander Companies would be significantly affected by and are opposed to the 48th Ave. S. Alternative. We and our client understand and share the City's interest in creating a harmonious solution that balances safe and efficient commercial truck traffic and the peace and safety of Allentown residents. As the City reiterates in its scoping notice, "[t]he purpose and need for this project is to develop an alternative route to the BNSF Intermodal Facility in Allentown to improve livability and safety in Allentown, without compromising the operations of the intermodal facility." We do not believe that goal is served by the 48th Ave. S. Alternative, which will have significant and disproportionate impacts on the natural and built environment well beyond those caused by other viable alternatives.

While the 48th Ave. S. Alternative has been part of the Project discussion for decades, we encourage the City to take a fresh look at the environmental context and exercise its due discretion in considering only those alternatives <u>that are reasonable today</u>. See Solid Waste Alt. Proponents v. Okanogan County, 66 Wn. App. 439, 446 (1992) [hereinafter "SWAP"] (The [City] is not required to explore every conceivable alternative."); WASH. ADMIN. CODE¹ [hereinafter "WAC"] 197-11-440 (clarifying that, under SEPA's mandate to explore "reasonable alternatives," "[t]he word 'reasonable' is intended to limit the number and range of alternatives, as well as the amount of detailed analysis for each alternative") (emphasis added). As our courts have made clear, community displeasure alone cannot be the basis for selection of alternatives. See Maranatha Mining, Inc. v. Pierce County., 59 Wn. App. 795, 804, cited in SWAP, supra. Rather, the City's selection of alternatives—and ultimately, of the Project site—should be driven by current data regarding the wide variety of appropriately considered environmental impacts, not by adherence to an outdated list of potential sites that was developed more than two decades ago.

Accordingly, we urge the City to decline to include the 48th Ave. S. Alternative in its Environmental Impact Study (**EIS**) and to focus on more viable alternatives, including the Current Route.² For the reasons outlined below, the 48th Ave. S Alternative should be excluded from the City's ongoing SEPA review of the Project.

I. SCOPING

The Determination of Significance/Scoping Notice for the Project, issued by the City on February 14, 2023, states that an EIS will be prepared for the Project. Given its scale and geographic context, we agree that the Project is likely to have significant impacts on various aspects of the built and natural environment, which will be heightened or decreased depending on the alternative chosen. We encourage the City to take a hard look at the breadth of these impacts in choosing alternatives

¹ The chapter of the Tukwila Municipal Code that contains the City's SEPA regulations requires that "[t]he SEPA rules contained in WAC Chapter 197-11 must be used in conjunction with this chapter." TUKWILA MUNI. CODE Sec. 21.04.010(B).

² See WAC 197-11-440(5)(b)(ii) ("The 'no-action' alternative shall be evaluated and compared to other alternatives.")

and evaluating the Project. Because "scoping is intended to identify and narrow the EIS to the significant issues[,]" we particularly urge analysis of the following:

A. Duwamish River Water and Habitat Impacts.

The presence of the Duwamish River in the Project area should factor heavily into the City's evaluation of the Project alternatives and their relative impacts. Any proposal that involves construction of a <u>new</u> bridge across the Duwamish River—rather than a non-river route or use of an existing bridge—is likely to significantly and negatively impact the river. Construction and the placement of permanent support structures will impact the river banks. Road runoff from cars and trucks crossing the new bridge will impact water quality, in turn affecting the plants and animals therein, including endangered salmonoid species. The increased traffic over a previously undisturbed section of the river will ultimately impact fish migration. Any such impacts to fish habitat and access may also constitute a violation of tribal treaty rights.

B. Traffic.

The 2015 BNSF Access Study SEPA Checklist suggested the Project in its then-current iteration would cause no significant traffic impacts because there would be no net change in the number of vehicle trips that would occur in light of a reroute of existing traffic. However, there *will* be significant impacts to the flow of traffic throughout the Project area depending on the alternative chosen, impacts that we encourage the City to fully evaluate. The impact of the addition of a significant amount of truck traffic to existing traffic along the alternative routes must be considered, including the impacts to businesses and residences along those routes.

C. Current Route Updates Since Previous Study.

Since the City's previous studies of the Project in the late 1990s and 2015-2017, the City has recently and independently approved replacement of the 42nd Ave. S. Bridge, which is part of the Current Route. Therefore, many of the assumptions of environmental and economic impacts identified in previous studies must be reevaluated, in light of the separate 42nd Ave. S. Bridge replacement *already underway*. For example, the 2017 Alternative Screening assumes replacement of the 42nd Ave. S. Bridge would be a required component of the Current Route. Because the replacement of the 42nd Ave. S. Bridge and related traffic improvements already are occurring independently, any associated environmental impacts should not be included in an assessment of the environmental impact of the Current Route alternative under this EIS.

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³ WAC 197-11-793.

D. Loss of Commercial Lands.

Several of the alternatives identified in previous study, including the 48th Ave. S. Alternative, would cause significant loss of important industrial and commercial lands in the City. The proposed conversion of commercial and industrial lands ought to be thoroughly analyzed in the EIS because such losses will affect the long-term economic prospects of the City and its residents. Relatedly, the Strander Companies urge the City to realistically and accurately analyze the costs associated with acquiring private property necessary for each of the alternatives, including appropriate compensation that may be required in the taking of any private land for the Project.⁴

E. Alternatives Analysis.

An EIS must focus on a project's "probable significant adverse impacts and <u>reasonable alternatives</u>[.]" WAC 197-11-408(1) (emphasis added). A "reasonable alternative" is "an action that could feasibly attain or approximate a proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation." WAC 197-11-786 (emphasis added). As has been the case for the nearly three decades during which the City has considered some iteration of the Project, the 48th Ave. S. Alternative is not a reasonable alternative given its significant environmental impacts, as described below. Accordingly, the Strander Companies encourage the City not to include the 48th Ave. S. Alternative in the EIS, and instead focus on reasonable alternatives that do not involve such significant construction, costs, environmental impacts, and private property takings.

II. THE 48TH AVE. S. ALTERNATIVE IS NOT A REASONABLE ALTERNATIVE.

A. Air Quality.

The 48th Ave. S. Alternative would involve the construction of a new bridge spanning the Duwamish River, located only approximately 350 feet north of the existing I-5 bridge. So much car and truck traffic concentrated in such a small area, especially one crossing a river, is likely to lead to significant air (and water) pollution concentrations. Those cumulative effects would be avoided through adoption of *any of the other alternatives already under consideration, or new alternatives* that don't involve additional construction so close to the interstate.

B. Water Quality.

As explained in Section I(A) of this Comment, the construction of a new bridge will significantly impact the water quality of the Duwamish River by causing runoff from the new roadway and

⁴ See Kucera v. State Dep't of Transp., 140 Wn.2d 200, 224 (2000) (en banc) ("[SEPA] does not require that those evaluating a proposed action consider environmental factors alone. Rather, the essential factors balanced frequently are the substantiality and likelihood of environmental cost and economic cost.").

other water impacts. These water quality impacts are significantly greater for the alternatives that require construction of a new bridge over the Duwamish River than for the Current Route and alternatives that do not require construction of new river crossings. Moreover, like air pollution, the water quality effects of placing two highly trafficked bridges only 350 feet apart must be considered.

C. Animals, Specifically Endangered Species.

Relatedly, the inevitable and detrimental impacts to the Duwamish River that the 48th Ave. S. Alternative would cause would directly impact the fish species therein. The 2017 BNSF Intermodal Facility Access Study identified the presence of Chinook salmon, steelhead trout, and bull trout in the Duwamish River, all of which are identified as "threatened" under the Endangered Species Act. David Evans and Associates, BNSF Study, April 17, 2017. Building a new bridge across the River would unnecessarily harm these threatened species. In particular, as explained by the Muckleshoot Tribe in 2000, any alternative that involves construction of a new bridge over the Duwamish River will have problematic direct and indirect impacts upon Chinook salmon's spawning and migration routes. Letter from Tribal Attorney K. Allston to K. Adams Pratt, dated April 14, 2000 ("Muckleshoot 2000 Letter") (attached). Since that time, the fragility and health of our native salmon populations has only become more dire. Road runoff from chemicals in tires (specifically, 6PPD-quinone) are directly responsible for the death of coho salmon in the area. Construction of a new bridge would increase turbidity in the River and unnecessarily increase shade over the River, further harming habitat. 2016 Checklist at 5.

In addition, a new bridge would increase public access over the River, which may impede or delay upstream Chinook salmon migration, increasing the level of stress experienced by the salmon and increasing pre-spawn mortality. Muckleshoot 2000 Letter at 2.

Finally, not only would a new bridge harm the fish directly, but it would violate the Muckleshoot Tribe's federally protected treaty rights to access its usual and accustomed fishing areas and right to take fish from these areas. *Id.* at 3. The proposed 48th Ave. S. bridge is the location of such historic treaty fishing, and impairment of these treaty fishing rights is unlawful. *Id.*

D. Shoreline, Recreation, and Land Use

The Duwamish River is a shoreline of statewide significance, within the City of Tukwila's Shoreline Overlay District. *See* Tukwila Shoreline Master Program at 2 (Mar. 2, 2020). Therefore, selecting any alternative involving construction of a new bridge across the Duwamish River, including the 48th Ave. S. Alternative, would significantly and unnecessarily impact a portion of

⁵ See Z. Tian et al., <u>A Ubiquitous Tire Rubber–Derived Chemical Induces Acute Mortality in Coho Salmon</u>, 371 SCI. 185 (2020).

shoreline land. In addition, construction of the bridge would require significant land disturbing activities in Critical Areas regulated under Tukwila Municipal Code 18.45.030.

Relatedly, the 48th Ave. S. Alternative would interfere with the existing Green River Trail, one of the longest continuous regional trails in the Puget Sound region. The Green River Trail runs along the western portion of the Duwamish River and would be interrupted or need significant modification to accommodate a new bridge along 48th Ave. S. Construction of a 48th Ave S. bridge would also require removal of the several public parking stalls located on the west side of the river, which are used for access to the Green River Trail. These unnecessary modifications to the Green River Trail would appear to conflict with the City's Comprehensive Plan Parks, Recreation and Open Space goals. *See* Tukwila Comprehensive Plan, Policy 6.1.5 ("Increase physical and scenic connectivity with the Green/Duwamish River."); Policy 6.2.1 (encouraging "[p]reservation of and public access to community landmarks that help make up the City's identity, including the river and historic sites").

The 48th Ave. S. Alternative would also require the acquisition of a significant portion of fully developed private property. While 48th Ave. S. spans a relatively short distance, it is home to numerous businesses including several gas stations, a hotel, a construction equipment supplier, and a truck rental company. We understand that the 48th Ave. S. Alternative would involve the widening of the road, so as to physically impact the existing businesses. The cost of doing so—including providing appropriate compensation for any such takings—will be significant, especially in comparison to the other proposed alternatives with fewer existing improvements at risk.

E. Historic and Cultural Preservation

As discussed in the attached Muckleshoot 2000 Letter, the development of a new bridge at 48th Ave. S. over the Duwamish River would directly and illegally violate the Muckleshoot Tribe's federally protected treaty fishing rights. *See United States v. Washington*, 694 F.2d 1374, 1381 n.15 ("The State's obligation to take reasonable steps to preserve and enhance the fishery applies to the grant of State permits as well as to the State's own projects."); *Muckleshoot Indian Tribe v. Hall*, 696 F. Supp. 1504, 1510 (W.D.WA 1988) ("The right to take fish at all usual and accustomed fishing places may not be abrogated without specific and express Congressional authority."). The City is required to consider the legality of the Project in reviewing the significance of its impacts under SEPA. *See, e.g.*, WAC 197-11-330(3)(e)(iii). Given the potential for the invasion of the

⁶ The Muckleshoot Tribe has federally protected rights to access its usual and accustomed fishing areas under the Treaty of Point Elliott. 12 Stat. 927 (1855); *United States v. Washington*, 384 F. Supp. 312, 365-66 (W.D.WA 1974). Article 5 of the Treaty of Point Elliott secures the Muckleshoot Tribe's "right of taking fish at usual and accustomed fishing grounds and stations." "Because the right of each treaty tribe to take anadromous fish arises from a treaty with the United States, that right is reserved and protected under the supreme law of the land, does not depend on state law, is distinct from rights or privileges held by others, and may not be qualified by any action of the state." *United States v. Washington*, 384 F. Supp. 312, 402 (W.D.WA 1974).

Tribe's treaty rights, the 48th Ave. S. Alternative cannot be considered a "reasonable alternative" for the Project.

F. Traffic and Arterial System Impacts

For all options except the Current Route, the traffic impacts would be significant and must be a central consideration. The 48th Ave. S. Alternative would be particularly problematic. Trucks traveling south along I-5 to the BNSF Intermodal Facility would exit I-5 at exit 156 on a short off-ramp, turn right onto Interurban Avenue S. then almost immediately right again onto 48th Ave. S. This will predictably create a traffic backup not only for trucks and other vehicles turning onto 48th Ave. S. but also for any cars getting off at exit 156 and attempting to travel elsewhere along Interurban S.

Moreover, <u>unlike each of the other identified alternatives</u>, 48th Ave. S. is not a designated arterial.⁷ Accordingly, routing trucks along 48th Ave. S. would either violate or require revision to the Tukwila Municipal Code's functional arterial system.

G. Impacts to the Built Environment

The 48th Ave. S. Alternative would have significant impacts on existing businesses and infrastructure in the area, which previous SEPA review of the Project has underestimated and downplayed. For example, the 2016 SEPA Checklist concedes that "[g]uests at the Days Inn could experience intermittently higher noise levels" from the truck traffic. 2016 Checklist at 14. Such noise impacts would be detrimental to the Days Inn's business, as increased truck traffic noise outside a hotel would inevitably and significantly decrease demand of the hotel. In addition, the 48th Ave. S. Alternative, unlike the other alternatives, would require the City's acquisition of at least 25,000 square feet of private property, the cost of which was not adequately addressed in prior study, and has only increased in the time since last considered.

III. CONCLUSION

We appreciate the City's serious consideration of the potential environmental impacts of the Project as it completes scoping and selects appropriate alternatives for study. As is evident from past study and the concerns and impacts discussed herein and in other comments, the Project will result in significant adverse environmental impacts to many elements and sub-elements of the natural and built environments. We have laid out several of the impacts we understand to be of most concern at this early juncture but trust the City will conduct a full and appropriate analysis of all elements, taking into account changes in conditions since previous studies of the Project

⁷ See TMC 9.18.030(4) (designating 42nd Ave. S. as a "collector arterial"); TMC 9.18.030(2) (designating S. 112th Street as a "collector arterial"); TMC 9.18.020(B)(1) (designating Airport Way South as a "minor arterial"); TMC 9.18.040(6) (designating Gateway Drive as a "conceptual arterial").

were conducted. In so doing, we believe it will be clear that the 48th Ave. S. Alternative is unreasonable, disproportionately harmful to the environment, and should not be included in the Project EIS.

Thank you for your consideration of these comments.

Very truly yours,

Davis Wright Tremaine LLP

Clayton P. Graham

cc: Louise Strander

Megan Raymond



ATTORNEYS

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August 25, 1998

HAND DELIVERED

Transportation Committee City of Tukwila Tukwila, Washington 98188

Re: 4

48th Ave. SE project

Dear Committee Members:

Our firm represents Ms. Louise Strander and her family regarding the City's relocation of Burlington Northern (BN) truck traffic onto 48th Avenue Southeast (48th). It appears you have received and are acting upon seriously flawed information, and you are missing important information, all of which is leading you towards incorrectly adopting 48th as supposedly the best alternative for alleviating the BN truck noise from the Allentown area.

The purpose of this letter is to point out the flaws in the information you are using, and address information you are apparently not considering, in the hopes that you will reconsider which is the best alternative. We want to show you that 48th is not the best, nor even the logical choice for handling the BN truck issue. Ms. Strander wants to avoid having to officially challenge the City on this matter, and this letter is submitted in a good faith effort to handle these matters without resort to other measures.

You, or rather the City's studies have stated that the following reasons support 48th as the appropriate choice among the alternatives considered so far:

- 48th is the cheapest solution or alternative;
- 2. it is the least disruptive to businesses;
- 3. it does not require large or expensive property acquisition;
- it is closest to a major freeway; and
- 5. it is best for BN.

There are serious flaws with the information and analysis leading to the above reasons. Please consider the following information, which shows the above reasons are incorrect.

A Professional Service Corporation combining Curran, Kleweno & Johnson, P.S. and Cromwell, Mendoza & Selut. P.S.

1. 48th is not the cheapest overall solution/alternative:

The figures given to the Committee in the studies show that the East Marginal Way alternative would cost \$8,987,691.00, the Gateway alternative would cost \$6,785,981.00, and the 48th alternative would cost \$2,838,608.00. The problem is that these figures do not accurately compare because of the "apples and oranges" approach used in arriving at those figures.

The East Marginal Way alternative is greatly inflated because it includes an estimated \$3,380,000.00 that BN has stated it will need to alter its facility. This "cost" is omitted as a factor in the 48th alternative, even though alterations will still be needed for BN if the 48th alternative is used. The omission seems intentional, in light of the size of the figure for BN's alterations and the obvious need for such alterations regardless of which alternative is used. The point is that the bottom line figures in the Harding Lawson study (the "study") have been artificially inflated, resulting in misleading and incorrect information because you are dealing with figures based on different (sometimes omitted) factors.

Another category of costs within the study which is flawed regards the costs of traffic impact for the three (3) alternatives. The most severe traffic impact out of all the alternatives occurs at 48th and Interurban Avenue. The City's study indicates: "Excessive queues and long delays would occur ... for westbound traffic on 48th at the approach to Interurban Avenue. These queues would also interfere with driveway access for the adjacent mini mart/filling stations." "The increased traffic volumes ... on 48th as alternative access for the Hub Center would also increase traffic frictions and delays at the other driveways on those streets." "The increased traffic turning volumes at the South 129th Street/South 130th Place intersection under the 48th alternative will increase traffic delay and hazard at that severely skewed intersection, even with some improvement in the intersection geometry."

In addressing severity of these traffic impacts, the study considered potential mitigating roadway and traffic control measures such as providing additional lanes on 48th, a second left-turn lane for movement from Southbound Interurban Avenue onto Eastbound 48th, and a revision in the southbound I-5 off-ramp channelization lane designations. It is clear from the study that some and most likely all of these mitigation measures will have to be implemented to address the severe traffic impact of the 48th alternative. However, no money for such mitigation is figured into the costs presented to you for the 48th alternative. Showing even further the unbalanced way in which factors were applied

for the alternatives, \$100,000.00 was added for a traffic signal to the costs for the East Marginal Way alternative. Because nothing is shown for traffic mitigation costs for the 48th alternative, the figures for 48th are grossly underreported.

Yet another area where the cost figures used by the study are critically flawed is found in the amount of condemnation costs for the 48th alternative. The study estimates these costs as \$7,600.00. This is grossly underestimated. Consider the condemnation and inverse condemnation costs of taking property along the south side of 48th. This will be tremendously expensive for the City. The study apparently considers only a per square foot cost of the real property that would be taken by the City. The study does admit that the 48th alternative will impact the BP station and access to the Penske yard, but utterly fails to consider the costs of the impact in the bottom line figures. Even worse, and more expensive, the study fails to recognize and consider the very severe impact and large costs to Hertz, Denny's, and the Silver Cloud Motel. Washington case law is clear that in this situation, the City, as the condemning authority, will bear the costs of mitigating impact, not the owner or users of the property. Those costs will be extremely large because of the devastating impact such condemnation will have on those business and properties.

Please note that you apparently take into consideration all costs to BN, and even make that a key factor in choosing a sight, but you are not giving any consideration to the very great costs the City will incur to the owner/businesses on the south side of 48th.

2. Disruption to Businesses:

The traffic impact of the 48th alternative on the BP station will be devastating to that business. It will likely result in closure of that business. Condemnation on the south side of 48th will render the Penske truck bays virtually unusable. The City's condemnation costs will include relocation on that site and construction of new truck bays, as well as reconfiguration of the Penske operation to accommodate the forced relocation. The same is true for Hertz' facilities and operations. The Hertz building/facilities are located very close to the existing right of way. The large equipment that must be maneuvered through that facility will no longer be able to do so if any condemnation occurs by the City. Accordingly, there will be relocation, reconstruction and reconfiguration costs payable to Hertz, along with condemnation value to pay to the owner of that property.

Note that costs of building demolition were included in the figures for both the Gateway

and East Marginal Way alternative, but completely omitted from the 48th alternative.

The information, factors and figures omitted in the study regarding the 48th alternative begin to look peculiar. How could the study miss so many obvious issues and costs, especially when they are considered in the other alternatives for other matters?

Note Denny's very close location to the existing right of way. The costs of mitigating noise and access impacts will have to be borne by the City. The impact of noise will most adversely effect the Silver Cloud Motel. Consider the obvious incompatibility of the motel use with the truck traffic which has peak hours during 1:00 a.m to 3:00 a.m. Yet not even minimum noise abatement costs are considered in the study. The noise impact on the Silver Cloud Motel will be ruinous. Not only that, the entrance and the fire lane there will be completely eliminated from condemnation along the south side side of 48th.

3. Property acquisition and impactexpenses will be very high:

It is obvious that the \$7,600.00 included in the study for condemnation costs is woefully inadequate. That figure overlooks very large impact costs the City will have to bear with both the landusers and owner along the south side of 48th. That figure will not even begin to cover the City's litigation expenses which will arise during the condemnation process.

These impact costs regarding the businesses and owner of the property involved on 48th are <u>not</u> included in the bottom line figures for the 48th alternative. Any attempt to mitigate these costs by a suggested crossover road from Gateway will do nothing to decrease these business/property impacts and costs.

The conclusion that the 48th alternative is the least disruptive to business and does not require large property acquisitions is incorrect. It is one of the most business disruptive of all the alternatives. Although the land to condemn along 48th may be small in amount, the costs, which will include mitigation measures, reconstruction and reconfiguration of business facilities, will be the highest for the City.

4. 48th being closest to I-5 is not a benefit:

The belief that the 48th alternative is a good one because it is close to the freeway is fundementally flawed. The study itself points out that precursory traffic impact studies show that 48th is actually too close to I-5, which causes severe traffic impact.

5. Best for BN?

You have publicly acknowledged that the East Marginal Way alternative is the cheapest for the citizens of Tukwila, yet it was decided to not pursue that alternative. Instead, the City is apparently willing to spend millions of dollars so that BN does not have to do so.

Our experts confirm, after reviewing the study, and examining the site and surroundings, that the City will end up spending perhaps millions more that has been publicly admitted by the City or shown in the study.

Aside from the costs of pursuing the 48th alternative for the benefit of BN, Washington law prohibits condemnation for a private purpose. Washington courts are very clear that a condemning authority will not get past the first step of a condemnation action, which requires a showing of public use and necessity, if the true purpose behind the condemnation is private rather than public.

Based on the above information, which shows the three alternatives do not use the same factors or considerations for arriving at the figures shown, the reasons of the City for choosing the 48th alternative are not supported by the real facts or figures, unless the City is simply choosing it because that is what is wanted by BN.

Failure to comply with SEPA requirements:

The City has taken "action" and has clearly chosen 48th as its choice of the alternatives. However, no SEPA review has been submitted or started. Compliance with SEPA review procedures is past due, yet the environmental impacts remain to be addressed by the City.

Lack of notices:

Our client is very disturbed by the nature, timing and lack of notice of any committee meetings or hearings on this matter. It appears that public hearings on this project have been carefully selected for favorable target groups so that only biased information is being received by you. Our client is going to be severely impacted by the City's choice of 48th, yet she has not been notified of hearings on this subject. She found out about one (1) information session only by chance.

Conclusion/request:

Given the flaws in the information and lack of complete information provided to you, we respectfully request that you revisit and reconsider the decision to pursue the 48th alternative. You should demand, receive, and use complete facts and figures information before committing to spend millions of dollars pursuing the 48th design. It is fair and appropriate to expect this from you. After all, Ms. Strander is a long-time citizen of Tukwila, and City decisions which will prove very harmful to citizens should be carefully and fully scrutinized before being implemented.

Please understand that any condemnation or inverse concdemnation actions by the City on the south side of 48th will be vigorously contested on every possible legal basis. Ms. Strander has no choice. Such condemnations will ruin some of the businesses there and seriously harm the others.

Nothing herein may be construed as a waiver, limitation or release of any legal remedies, claims or rights, and all rights and remedies, at law and in equity, are expressly reserved.

Thank you for your time and consideration. We request a formal response at earliest convenience.

Sincerely,

CC:

CURRAN MENDOZA, P.S.

Grogery 1: Groniman

Ms. Louise M. Strander



MUCKLESHOOT INDIAN TRIBE

OFFICE OF THE TRIBAL ATTORNEY

39015 - 172ND Avenue S.E. • Auburn, Washington 98092-9763 Phone: (253) 939-3311 • FAX: (253) 931-8570



APR 1 7 2003 AM PM 718191011111211213141516

April 14, 2000

1

Kim Adams Pratt Curran Mendoza P.S. 555 West Smith Street P.O. Box 140 Kent, WA 98035- 0140

BY FACSIMILE AND U.S. MAIL

Dear Ms. Pratt:

The Muckleshoot Tribe understands that you represent property owners in the City of Tukwila in regard to the City's desire to reroute Burlington Northern Sante Fe ("BNSF") truck traffic. The Muckleshoot Indian Tribe's Fisheries Department ("MITFD") has reviewed the City of Tukwila's proposals to improve road access for trucks utilizing the BNSF railyard located in Tukwila next to the Duwamish River. Three of the proposals involve the construction of a new bridge over the Duwamish River just downstream of the I-5 crossing of the Duwamish River. The Gateway options involve bridge construction over an area known as Codiga Farm. The 48th Avenue alternative would occur several hundred yards upstream. Bridge construction at either site will have direct and indirect impacts upon chinook salmon, the impacts varying with the alternative selected. Therefore, alternatives that do not require the construction of a bridge are available and the bridge alternatives should be excluded from further consideration.

Environmental Background

The area is tidally influenced and some mud and sandflats are located within the river channel. The salt water wedge extends through and upstream of the site during the low flow season at low tide. During high tide, the salt wedge can reach the project area after May, a time period when juvenile chinook are known to be rearing in the Duwamish Estuary. Juvenile chinook migrate downstream until they reach the leading edge of the saltwater wedge. Upon reaching the saltwater wedge, the juvenile chinook began acclimation to salt water. As the upstream extent of the saltwater wedge moves with the tides and freshwater inflows, juvenile chinook move with the wedge, but as they acclimate to saltwater exhibit a net downstream movement. Thus, the project location is located at the upper edge of where juvenile chinook begin adapting to saltwater. Adult chinook also pass through this area to reach the upstream spawning grounds.

(Strander, Zitnik, briffinh & Morrow)

Kim Adams Pratt April 14, 2000 Page 2

Project Impacts

Gateway Drive and Gateway Drive (B)

Direct Impacts

The alternative involves construction a new bridge which will cross the Duwamish River and Codiga Farms. The narrative description states that the bridge span is designed to keep the abutments out of the river during flooding events, but that the center pier will be submerged at flood stage and will cause a minor backwater effect. However, the flood event mentioned is not described. Thus, I am unsure if it is a 1 year flood event or a hundred year flood event. The smaller the flood event, the greater the potential physical impact to juvenile salmon rearing habitat by physical displacement of sandflat, mudflat, or riparian area. Additionally, the river is intertidal in this reach. The bridge will shade the intertidal area and depending upon the extent of shading may reduce the primary production in the shaded area. Juvenile chinook feed upon organisms dependent upon primary productivity. Thus, it is possible this project may result in a minor reduction of food production for chinook. Given that there has been a 98% loss in the intertidal wetlands contributing to this food chain, further reductions could pose a problem.

The proposed new bridge will include paths for pedestrians and bicyclists. This will increase public access over this part of the River. The River is expected to be warm during the upstream migration of adult chinook, temperatures exceeding preferred limits, and indeed, the NMFS Properly Functioning Conditions ("PFC"). Based upon MITFD observations of upstream coho migration in the Sammamish River, it is possible that people standing on the bridge to observe the upstream migration of adult chinook may impede or delay the upstream chinook migration. Delays of upstream migration in stream reaches with elevated temperatures will increase the level of stress upon chinook and increase pre-spawn mortality.

Indirect Impacts

The two Gateway alternatives will pass over an area known as Codiga Farm. This site is under consideration for use as a major restoration project in the Duwamish Estuary. The bridge spans will pass over this site. Thus, the bridge will shade the planted riparian and intertidal vegetation. Additionally, the presence of a bridge will preclude the planting of trees under the bridge due to maintenance and safety concerns.

48th Ave

Direct Impacts

The same direct impacts as previous described are likely to occur, though some will be less in magnitude for the following reasons:

Kim Adams Pratt April 14, 2000 Page 3

- (1) the site appears to be several hundred yards upstream and thus the influence of salt water during the chinook juvenile outmigration period is less;
- (2) the river channel is narrower and thus shading impacts cover a less area.

Treaty Fishing Rights

The Tribe has federally-protected rights to access to its usual and accustomed fishing areas, as well as a right to take fish from these areas. <u>U.S. v. Washington</u>, 384 F. Supp. 312 (W.D. Wash. 1974); <u>U.S. v. State of Oregon</u>, 718 F.2d 299, 303-4 (9th Cir. 1983). Treaty fishing occurs at the site at which the bridges are proposed and would be impacted by bridge construction. Impairment of access to treaty fishing rights is unlawful and constitutes an unacceptable consequence of the proposed project. Protection of the Tribe's reserved treaty rights is paramount. Case law reinforces this position and obligates federal agencies to protect treaty fishing rights by denying permits for projects that impact a tribe's right to access. <u>See</u>, <u>Muckleshoot Indian Tribe v. Hall</u>, 698 F. Supp. 1504 (W.D. Wash. 1988); <u>Northwest Sea Farms</u>, <u>Inc. v. United States Army Corps of Engineers</u>, WL 387756 (W.D. Wash. 1996). Accordingly, the Tribe would oppose any applications for federal permits required for this proposed project.

The Tribe has successfully opposed projects in the past that impact its treaty fishing rights. The Tribe urges the Task Force to consider other alternatives than construction of a bridge over the Green River in order to avoid formal opposition by the Tribe in the future. Please contact me if you have any questions or need further information.

Karen Allston

Tribal Attorney

From: Project Data <projectdata@construction.com>

Sent: Tuesday, May 30, 2023 1:41 PM

To: Allentown Truck Reroute <AllentownTruckReroute@TukwilaWA.gov> **Subject:** Request For Planholders for Allentown Truck Reroute Project

Hello,

Dodge Construction Network wants to ensure we have the most complete and accurate information regarding "Allentown Truck Reroute Project" that is bidding on "06/01/2023".

DCN is requesting the following information

- •Planholders list/bidders list or mandatory prebid list
- Confirm that the bid date and time listed above are unchanged
- •Any addenda that have been released, please attach them to this response
- •Construction cost estimate or a construction cost range for the project

Please send the information via email to projectdata@construction.com or via fax to 800-768-5594. Thank you for your time and assistance.

Bid Research Team

- +1 800 393 6343 T
- +1 800 768 5594 F

projectdata@construction.com E

construction.com















Dodge Number: 202300179876

Reporter ID: DEOP99

Dodge Construction Network is dedicated to delivering the most complete and accurate information on projects, people, firms, and products across the commercial construction industry. For more information, you can visit our website, www.construction.com

From:

Date: May 31, 2023 at 11:01:16 AM PDT

To: Kate Kruller < Kate. Kruller@tukwilawa.gov >

Subject: Allentown Truck Reroute

My home on 51st PI So, which does not show on the Alternative proposal, rattles and you can feel and hear the kaplunks every time a truck drives over the filled potholes that are making indentations in the road. This is coming from 50th PI So.

If either proposal 3, 4 or 5 is selected the rattling, noise and kaplunks would be worse as they would be right across the street. A wall would not stop that .

The home that is on the same side as the BNSF would be greatly affected, how would you protect them? The turn off of 129th overpass would be too sharp.

The trucks are bigger and longer than they were years ago.

If any one of 3, 4 or 5 are chosen, Tukwila or BNSF should buy out the homes on 50th Pl So and 51st Pl So and also the homes on 124th between 50th Pl So and 51st Pl So and any others that would be affected.

Please choose Alternative 1 or 2.

From:

Date: Thu, Jun 1, 2023 at 12:14 PM Subject: EIS Scoping Comments

To: <AllentownTruckReRoute@tukwilawa.gov>

Cc:

Two immediate impressions from looking at the five proposed alternatives are:

- 1) There are significant logistical, access, and permitting barriers for all of them and that I hope are not going to be used as an excuse to continue to do nothing about getting the truck traffic out of this residential neighborhood. Effort is going to be needed for a long-overdue solution and everyone knows this isn't going to be easy.
- 2) Proposed Alternatives #1 & #2 have the least number of barriers (on paper), but these include the need for BNSF to change configurations on their property and they have been non-participants, even when asked, to this point, as well as the potential for the Sound Transit BAR (Boeing Access Road) station construction interfering with the proposed routes.

The North entrance proposed alternatives do the best job of removing the truck traffic from the neighborhood - which is the neighborhood's ultimate goal.

In prior studies the north end options have been the most expensive, and concerns about interference with the utilities corridor and wetlands in these areas, as well as the need for easements from public entities and private property owners have been cited as barriers, but it appears that this time these would be less expensive than the other proposed alternatives because they do not include building a bridge and doing major road re-configurations. I would like to see the costs associated with each of these options as well as proposed timelines because of permitting, easement, etc. issues that would need to be addressed with each one.

I would like to know what, if any, impact the Sound Transit BAR station construction will have on the north access options.

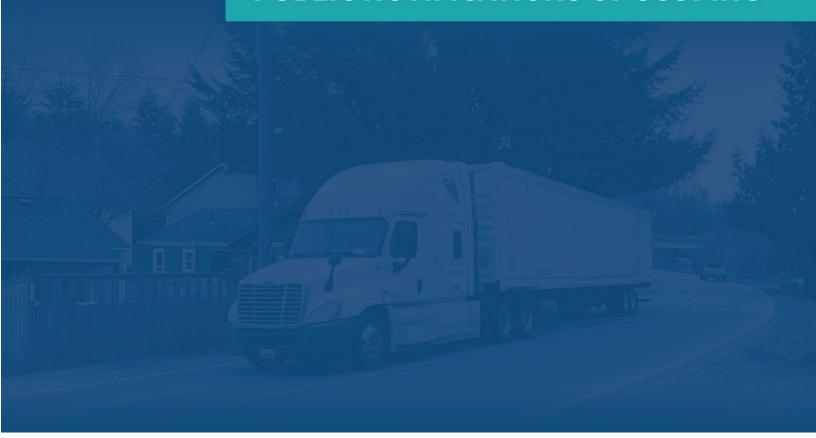
If Alt. #1 includes getting rid of the Seattle Police Dept. firing range, that would be a wonderful and welcome benefit to both the Allentown and Duwamish neighborhoods. It is almost impossible to enjoy visiting and walking around the Duwamish Hill Preserve without hearing gunfire. I hear it at all hours of the day from my home in Allentown. I have to warn everyone I take there that yes, you are hearing gunshots, and no, we are not the targets. This long standing public-private partnership has created and preserved an important space that is sacred to the Duwamish and Coast Salish peoples and has been designed to be an outdoor classroom for students to learn about local history and biology. It is unnerving and stressful for teachers/parents to take students into this space and deal with the sound of gunfire while trying to conduct lessons.

Thank you for the opportunity to comment.



APPENDIX B

PUBLIC NOTIFICATIONS OF SCOPING



PHASE 1

February 14, 2023 - March 15, 2023

Mailed Postcard



ENVIRONMENTAL REVIEW PROCESS

The City of Tukwila is preparing an Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown.

An EIS is a process to evaluate potential effects that a proposal may have on the built and natural environment. The first step in the EIS is called scoping. Scoping is where we ask you to share your input on what issues and alternatives should be analyzed in the EIS.

You know your community best, and we need your help to better understand your neighborhood and the surrounding environment.

Please take a moment to learn about the EIS and share your input during this scoping period!



Scan QR code to

The formal EIS scoping comment period is February 14th through March 15th. Here are ways you can provide input:



Leave a scoping comment via the project website or email

Tell us about resources you'd like to protect and valuable sites in your community.

Share your input by entering a comment on our project website using the QR code below or send us an email.

EMAIL: AllentownTruckReRoute@TukwilaWA.gov

Attend our community meeting on February 28th

WHERE: Tukwila Community Center

WHEN: February 28th, 2023

 $5:30-7~\mathrm{p.m.}-A$ brief presentation will start at $5:45~\mathrm{p.m.},$ followed by optional small group discussions.

Learn more about the project, provide formal scoping comments,

Join us for a community meeting!

Learn more about the project, provide formal scoping comments, and stay informed on next steps. To request an interpreter, please send an email to the address below by February 20th.

OUESTIONS?

Please contact Mark Hafs

EMAIL: AllentownTruckReRoute@TukwilaWA.gov



The formal EIS scoping comment period is February 14th through March 15th.

La ciudad de Tukwila está considerando alternativas para desviar el tráfico de camiones BNSF existente en Allentown. Para obtener más información, visite nuestro sitio web y participe en una reunión comunitaria el 28 de febrero de 5:30 a 7 p.m. Los servicios de traducción e interpretación están disponibles bajo petición. Envíe un correo electrónico AllentownTruckReRoute@TukwilaWA.gov antes del 20 de febrero.

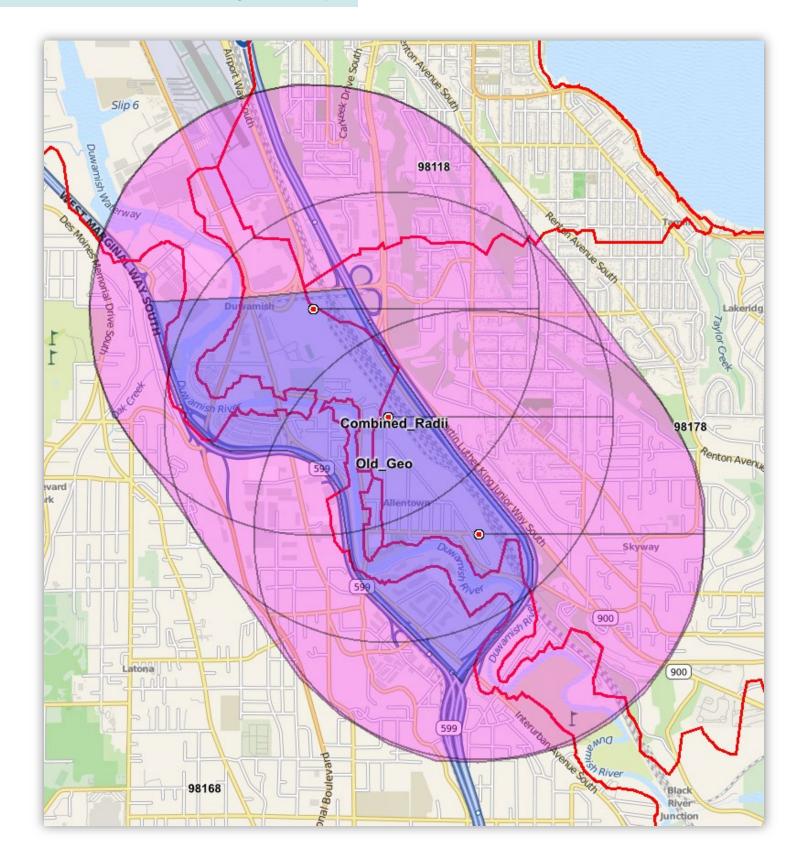
Thành phố Tukwila đang xem xét các giải pháp thay thế để định tuyến lại số lượng xe tải BNSF hiện tại ở Allentown. Đế tìm hiểu thêm, hãy truy cập trang web của chúng tôi và tham gia cuộc hợp cộng đồng vào ngày 28 tháng 2 từ 5:30 - 7 giờ chiều. Dịch vụ biến dịch và phiên địch được cung cấp theo yêu cầu. Email AllentownTruckReRoute@TukwilaWA.gov trước ngày 20 tháng 2.

City of Tukwila waxay diyaarinaysaa Bayaanka Saamaynta Deegaanka (EIS) si loo qiimeeyo beddelka ah ee lagu hagayo taraafikada baabuurta BNSF ee Allentown. Si aad wax badan ka barato, booqo websaydkayaga oo ka soo qayb gal shirka bulshada Febraayo 28 ka 5:30 - 7 p.m. Adeegyada fasiraada iyo tarjumaada ayaa diyaar ah marka la codsado. limayl u soo dir AllentownTruckReRoute@TukwilaWA.gov ugu dambayn Febraayo 20.



6200 Southcenter Boulevard Tukwila, WA 98188

Mailed Postcard: Delivery Area Map



Seattle Times Legal Notice (February 14, 2023)

04 Sports | Tibe Smittle Climes | Tuesday, February 14, 2023 |

Carlos Corres (4) sisnd in a dejlenutive injliekt shift this year.



BASEBALI

Players will work on adjusting to pitch clock, infield-shift limit

PALM IBIACH, Flu.

PALM IEMACL, Fiz.—Jeff McKell inhish he will adapt quickly so hashball's hig differ modely, an and-shift. The playing a normal second fusion flow instead of inshort right field. Pro been playing second base my whole life on inhodder be no hard on adapt on," the New York Men All-Scar infidition on the control of the control of the control of the control of the new York Men All-Scar infidition and his country. finider and big-league bar ring champion said. Spring training opens d week in Florida and Arizo

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This has been an eight-ar offers for us, "MLE com-teioner Eth Manfred said last week, thinking back to when the first experiments were formulated. Those we or, more action, more

addiction."

Spring ruining started a month late last year became of the lockout, and many players strambled for dislate as camps opened. This off-team has proceeded more normally and some of the

Cactus League report dates

Pitchen, catchen and position players in Arizona:								
	180	PVC	POS.					
Arizona	Scottnebale	Wednesday	Monday					
Chicago Cubs	Mena	Wednesday	Monday					
Chicago White Sox	Phoenix	Wednesday	Monday					
Cincinnati	Goodynur	Wednesday	Monday					
Cleveland	Goodynur	Friday	Turnday					
Colorado	Scottschole	Wednesday	Monday					
Caman City	Surprise	Wednesday	Monday					
LA Angels	Tempe	Wednesday	Monday					
LA Dodgen	Phoenix	Thursday	Monday					
Milwaybre	Phoenix	Thursday	Turnday					
Daktand	Mena	Wednesday	Monday					
San Diego	Peorts	Thursday	Turnday					
San Franchico	Scottsdale	Thursday	Turnday					
Souttle	Peorts	Wednesday	Monday					
Texas	Surprise	Wednesday	Monday					

focus will be on man with new horner. Jamb de Grant (Total), Justin Verlander (New York Men), Thu Turnor (Philadelphia) and Xandor Boggerts (San Diego). Some grams also have new

thrown as John McGraw and Connic or and Hilly

Marrin. Ravebally rime leanen spanned a consury and a half in a sport

commy and a half in a sport obsessed with its supial crased history of flamasi-clid plomover. "In baseball, therein no clock," "Refrand Generalong wrose in "Take Me Out," this Tony Award winning play. "What could be more generous data to give everyone all those opportunities and the

Tirm out, all those dead minuses became an annoy-ance to many people in an age of decreased amendon spars and increased enter-

nine-inning game orne from 2 hours, 30 minu the mid-1950s to 2:46 in 1989 and 3:10 in 2021 before dropping to 2:04 last year after the introduction of the Pitch Com electronic device to signal pitches.

with cook, in threat about Tumps lay manager lawin Cash said. "Speed the game up. They get too long. It we've playing the Bod Sox or playing the Tanken, they said they box-boar ball-

games."

Use of a slightly stricted clock in the minors (14/19 as Class AAA and 14/18 as

Lawre level) can the average game dime from 2:00 in 2021 to 2:26 har year. "My guedi in in April you're-going to probably use some incidence. I'm inevitable," Cleveland manager Terry Francisca said, "Flimes are sody's going to get a ball." With the fibe in shifts and

higher wicetry piethes, th burning average-dropped from 260 in 2006 to 240 last year, in lower last year, its lower since th record low of . 239 in 1968. Defendes shifts on built in play recaled 70,853 law

McNell, a lefty barrer, in likely to benefit from infield-en rise altimod back to

on rigatitated back to where they were before the Australia fire.

When they do shift me, I just his against the shift. And when they don't shift me, I just his, 'joined and.' When they do give me a giant hole morewhere, then I'm going ... no get the ball strongh their and my m get my single.

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eram to finish. Granced, most rearm have a microsoful extrect each season that one can highlight and thus etag-gerate half some ability— bur 61-33 so end the segson

Insignificant.
One of the reasons they improved inhocasse they acquired ace pitcher Luis Castilio, the revo-time All-Star who helped guide the Marinets to victories in his first three games after joining them at the made deadline— then stored an expension that

ar least 2027.
Another was the middenson makes launch of follow starting plether Richile Ray.
That mame might leave a binne rame in some fast' mouths given that it was Ray who gate up the Game 1 walked home ram to Aurea almost visities. Profess Richile Richile Ray with the Ray who gate up the Game 1 walked home ram to Aurea almost Visitian Richile Richile. slagger Yordan Alvarez in the divisional round. But for embled the 2021 Cy ung Award winner than artic covered to much. Seame covered on much.
Robbie had a rough September and October. Nobody
will dispute that. But he has
enough of a track record to
Indicate he can rediscover

condust to influence. Censor fielder Julio Foodinguese, who wen the American League Hookie of the Food ramberson, is projected by Tangrapha.com on have the fourth-bent WAT in househall. League Cilbert, meanwhile, just pound a 13-6 record in his second-season (firm in which the carried meanwhile which he second-season (firm in which he seared more due.

which he maned more than 24 games), and fellow maner George Kithy looks to grow after finishing state in the AL.

HCP voiding.
Yee, the hophomore stump is a real thing — but no are second-year mayor. And when you to take electricing mentioned above and throw mentioned above and three in the addition of singger Tectoral Hertunder. In the outfield—there's astrong case to be made that Seattle

2022. The there is the question of

Why the Mariners will be worse

Health, health, health. There is no major-league seam that can go durough the season without injury trou-ble (the Mariners Misch Haniger played jun 57 games late year, for examp but Seante was relatively blessed in 2022 — and ex-

States, who passed a WAR of 1.9 km season. Thark one year after possing a -0.7 WAR with the Reds, and two years after possing. was me siech, and two yet after posting an 0.6 WAR. Which would are the M's likely to got near

layoffs.
Spring is in the air for M's uninight now. Hope is, ros. he lamer is very much justiced.

each started 32 games, with Kirby starting 25. Chris Res-on, who was fleated out of the rocation upon Carello's arriv al, marred 22 games, and Carello marred 11.

w, married 22 gamen, and Candilo married 11. To get that more of consti-uency out of your marring pinthing is jule stay of military loss. And to expect such optimal health again is far-feethed.

Blady to got text season? Plan, MLI by a league of adaptation. Pirchen adjust. History adjust. As much antic ipation as the Marinets. ingovers might be general based on last season, it's

in 2023.

Self, if I'm a Mariners fan, I'm lappy with what I've got. The soam might not be a World Series favories, bur i'rs one that could cause a world of hart for opponence in the

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CITY OF TUKWILA DETERMINATION OF SIGNIFICANCE (DS) AND REQUEST FOR COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT (EIS) Project Name: Allentown Truck Reroute Project

Proponent: City of Tukwila Lead Agency: City of Tukwila Project Location: Allentown, City of

Description of the Proposal: BNSF Railway owns the South Seattle Intermodal Facility on the east side of the Allentown neighborhood in the City of Tukwila. The intermodal facility transfers containers from trucks to railroad cars and vice versa. Incoming trucks accessing the Intermodal facility currently access it from the S. 129th St. Bridge to S. 50th Place. Outgoing trucks leaving the facility can use either the S. 129th Street Bridge or take S 124th Street to the 42nd Ave S. Bridge. After the planned replacement of the 42nd Ave. S Bridge, truck traffic will also be able to access the intermodal facility by traveling east on the bridge, and reaching the facility via S 124th Street. In order to improve livebility and safety in Allentown without compromising the operations of the yard, the City is evaluating new potential truck access routes to the intermodal facility.

Environmental Determination: The City of Tukwila, as the SEPA lead agency, has determined this proposal may have significant adverse environmental impacts on the environment. An EIS is required under RCW 43.21C.030(2)(c) and will be prepared.

Elements of the Environment: WAC 197-11 establishes that an EIS shall pro-vide a level of detail commensurate with the importance of the impact. The City has preliminarily identified the following elements of the environment for analysis in the EIS:

• Geology/Soils • Water Resources

• Public Services and Utilities

• Plants and Animals

• Land and Shareline Use

- Land and Shoreline Use
 Cultural Resources
 Recreation Environmental Justice
 Health and Safety Noise
 Transportation and Traffic
 Visual Resources and Aesthetics

- Air Quality

Alternatives: The City is seeking input from the public and stakeholders to help quide development and selection of potential alternative truck routes that could improve livability and safety in Allentown without compromising the could improve livability and safety in Allentown without compromising the operations of the intermedal yard. Comments on potential alternative routes will be accepted throughout the 30-day scoping period, after which a final determination will be made on which alternatives to analyze in the EIS. As required per WAC 197-11, the EIS will consider a No Action Alternative

Scoping: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS within the 30-day comment period beginning on February 14, 2023, and closing on March 15, 2023. All comments are welcome, but comments in the following areas are particularly valuable:

• Ideas for alternative routes

• Resources in and near Allentown that might be affected by alternative routes

• Measures to avoid, minimize, or mitigate effects of the action

All comments are due by 5:00 p.m., March 15, 2023, and may be submitted:

Online at: https://www.tukwilawa.gov/departments/public-works/construction-projects-and-transportation-impacts/allentown-truck-reroute-project/
Via e-mail to:
AllentownTruckReroute@
TukwilaWA any

AllentownTruckReroute®
TukwilaWA.gov
• In writing to: Mark Hafs,
City of Tukwila
6300 Southcenter Blvd. Suite 200
Tukwila, Washer Blvd. Suite 200
Tukwila, Washer Blvd. Scoping Meeting on 2/28/2023, 5:30 pm
Tukwila Community Center
12424 4240 Ave S
Tukwila, WA 98168

The EIS Public Scoping meeting will provide an opportunity to learn more about the proposal and provide input on the environmental review process.

Date: February 14, 2023 SEPA Responsible Official: Mark Hafs

The Hazelnut - online version

(Jan 2023 and Feb 2023 editions)

City of Tukwila E-Hazelnut Newsletter - January 2023



Quick Links

- City of Tukwila
 Website
- <u>City Employment</u> Opportunities
- Experience Tukwila
- TukTV
- COVID-19 Information

Tukwila Elected Officials

Mayor: Allan Ekberg

City Council:
Cynthia Delostrinos Johnson
(Council President)
Kathy Hougardy
De'Sean Quinn
Kate Kruller
Thomas McLeod
Mohamed Abdi
Tosh Sharp





Get Involved in the Allentown Truck Reroute Project



Community input is needed as the City prepares an Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown. You know your community best, and we need your help to better understand your neighborhood and the surrounding environment!

An EIS is a process to evaluate potential effects that a proposed project may have on the built and natural environment. The first step in the EIS is called scoping. Scoping is where we ask you to share your input on what issues and what alternatives should be analyzed.

The formal EIS scoping comment period will be from February 14th through March 15th. During this time, please send us a comment via email at AllentownTruckReRoute@TukwilaWA.gov.

We invite you to an Open House on Tuesday, February 28th from 5:30 to 7pm at the Tukwila Community Center (12424 42nd Ave S, Tukwila, WA 98168) to learn more about EIS and provide comment. More information about the project can be found on the City website.

City of Tukwila E-Hazelnut Newsletter - February 2023



Quick Links

- <u>City of Tukwila</u>

 Wabsita
- <u>City Employment</u> <u>Opportunities</u>
- Experience Tukwila
- <u>TukTV</u> • <u>COVID-19</u>

Tukwila Elected Officials

Mayor: Allan Ekberg

City Council: Cynthia Delostrinos Johnson (Council President) Kathy Hougardy De'Sean Quinn Kate Kruller Thomas McLeod Mohamed Abdi Tosh Sharp



Provide your comments on the Allentown Truck Reroute Project Environmental Impact Statement



Community input is needed as the City prepares an Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown.

An EIS is a process to evaluate potential effects that a proposed project may have on the built and natural environment. The first step in the EIS is called scoping. Scoping is where we ask you to share your input on what issues and alternatives should be analyzed.

The formal EIS scoping comment period is from February 14th through March 15th.

Formal comments can be provided by:

- Attending our community meeting tomorrow, February 28th from 5:30 to 7pm at the Tukwila Community Center (12424 42nd Ave S, Tukwila, WA 98168)
- Submitting an online comment on the project website
- Emailing a comment to AllentownTruckReRoute@TukwilaWA.gov
- Mailing a comment to Mark Hafs 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188 (Formal comments must be postmarked by March 15)

You know your community best, and we need your help to better understand your neighborhood and the surrounding environment!

The Hazelnut - print version

(January/February 2023 Volume 43, Number 1)

Get Involved in the Allentown Truck Reroute Project

Community input is needed as the City prepares an Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown.

An EIS is a process to evaluate potential effects that a proposed project may have on the built and natural environment. The first step in the EIS is called scoping. Scoping is where we ask you to share your input on what issues and what alternatives should be considered.



The formal EIS scoping comment period will be from February 14 through March 15.

During this time, please leave a comment on our website using the QR code at left or email us at AllentownTruckReRoute@TukwilaWA.gov.

You are also invited to an Open House to learn more about EIS and to provide your comments.

OPEN HOUSE

Allentown Truck Reroute Project EIS

DATE: Tuesday, February 28

TIME: 5:30 to 7:00pm

LOCATION: Tukwila Community Center

12424 - 42nd Avenue South

You know your community best, and we need your help to better understand your neighborhood and the surrounding environment!

Council Corner

2023 is predicted to be a year of HOPE, which inspired this message.

First, I find HOPE in being back together, in person, in

Happy Lunar New Year, the Year of the Rabbit! In Chinese culture, the rabbit is a symbol of longevity, peace and prosperity, and

community. Being present with each other and in the public is an important part of being a Councilmember. I invite all of you to attend our meetings this year, Mondays at City Hall or online

by Cynthia Delostrinos-Johnson, 2023 Council President



Allentown Mailing List E-Newsletter

(February 15 and March 21)



February 15, 2023

Hello community members,

Thank you for staying engaged with the <u>Allentown Truck Reroute Project</u>. The City of Tukwila is preparing an Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown.

An EIS is a process to evaluate potential effects that a proposal may have on the built and natural environment. The first step in the EIS is called scoping. Scoping is where we ask you to share your input on what issues and alternatives should be analyzed in the EIS. The formal EIS scoping comment period is February 14th through March 15th.

You know your community best, and we need your help to better understand your neighborhood and the surrounding environment.

Here's how to provide a scoping comment:

 Attend our Community Meeting on February 28th and provide your written comment in person

Where: Tukwila Community Center (12424 42nd Ave 5, Tukwila, WA 98168) When: February 28th, 2023 from 5:30pm – 7pm

To request an interpreter, email <u>AllentownTruckReRoute@TukwilaWA.qov</u> by February 20th.

A brief presentation will start at 5:45 pm, followed by optional small group discussions. Learn more about the project, provide formal scoping comments, and stay informed on next step.

- Submit an online comment form on our project website
- Email your comment to AllentownTruckReRoute@TukwilaWA.gov
- Mail your comment (must be postmarked by March 15, 2023) to Mark Hafs: 6300
 Southcenter Blvd, Suite 200 Tukwila, WA 98188

La ciudad de Tukwila está considerando alternativas para desviar el tráfico de camiones BNSF existente en Allentown. Para obtener más información, visite nuestro sitio web y participe en una reunión comunitaria el 28 de febrero de 5:30 a 7 p.m. Los servicios de traducción e interpretación están disponibles bajo petición. Envíe un correo electrónico AllentownTruckReRoute@TukwilaWA.gov antes del 20 de febrero.

Thành phố Tukwila đang xem xét các giải pháp thay thể để định tuyến lại số lượng xe tải BNSF hiện tại ở Allentown. Để tìm hiểu thêm, hãy truy cập trang web của chúng tôi và tham gia cuộc họp cộng đồng vào ngày 28 tháng 2 từ 5:30 - 7 giờ chiều. Dịch vụ biên dịch và phiên dịch được cung cấp theo yêu cầu. Email

AllentownTruckReRoute@TukwilaWA.gov trước ngày 20 tháng 2.

City of Tukwila waxay diyaarinaysaa Bayaanka Saamaynta Deegaanka (EIS) si loo qiimeeyo beddelka ah ee lagu hagayo taraafikada baabuurta BNSF ee Allentown. Si aad wax badan ka barato, booqo websaydkayaga oo ka soo qayb gal shirka bulshada Febraayo 28 ka 5:30 - 7 p.m. Adeegyada fasiraada iyo tarjumaada ayaa diyaar ah marka la codsado. Iimayl u soo dir AllentownTruckReRoute@TukwilaWA.qov ugu dambayn Febraayo 20.

Learn more about this project on our <u>website</u>. We look forward to seeing you on February 28th and reviewing your scoping comments!



March 21, 2023

Community members,

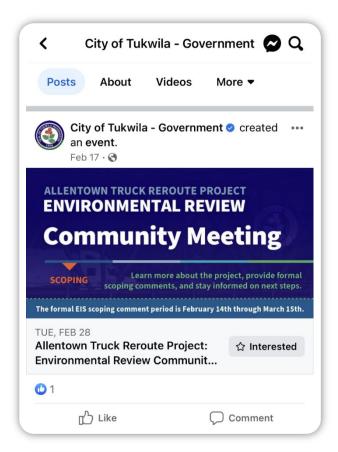
Thank you to those who participated in the first phase of scoping for the <u>Allentown</u>
<u>Truck Reroute Project</u> Environmental Impact Statement (EIS)! We appreciate everyone taking a moment to share their input on potential truck reroute alternatives and topics to study in the EIS.

Your input from the first phase of scoping (February 14th to March 15th, 2023) will help us know which topics to study in the EIS, and provide insight into potential alternative routes for BNSF truck traffic in Allentown.

We plan to proceed with the second phase of scoping in May. At that time, we will hold a public open house at which we will present a suite of potential truck route alternatives. After considering your feedback during a 30-day comment period, we will select the three alternatives that will be evaluated in the EIS. To learn more about the EIS process and the project, please visit our website.

More information about the second phase of scoping will be shared once we have a confirmed start date.

Social Media: Event & Posts









Social Media: Boosting Schedule & Budget

Facebook Event Boost

Target Area

BNSF facility (12200 51st PL S, Seattle, WA 98178) as geographic marker,
4-mile radius

Wednesday, February 22nd through Tuesday, February 28th

\$100

Facebook Post Boost

Target Area	BNSF facility (12200 51st PL S, Seattle, WA 98178) as geographic marker,
	4-mile radius
Runtime	Thursday, March 9 th through Wednesday, March 15 th
Budget	\$100

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
2/12	2/13	2/14 Scoping Starts	2/15 Create FB event	2/16	2/17	2/18
2/19	2/20 Twitter post	2/21	2/22 FB event	2/23	2/24	2/25
	#1		boost			
2/26	2/27	2/28 Comm Mtg	3/1	3/2	3/3	3/4
3/5	3/6 Twitter post	3/7	3/8	3/9 FB post boost	3/10	3/11
3/12	3/13	3/14	3/15 Scoping Ends	3/16	3/17	3/18

Tukwila Community Center Poster

ALLENTOWN TRUCK REROUTE PROJECT

ENVIRONMENTAL REVIEW PROCESS



The City of Tukwila is preparing an Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown. You know your community best, and we need your help to better understand your neighborhood and the surrounding environment.

Scoping is where we ask you to share your input on what issues and alternatives should be analyzed in the EIS. Per State Environmental Protection Act (SEPA) guidelines, all formal comments must be written and submitted within the formal scoping comment period.

Formal phase 1 scoping period:



February 14, 2023 through March 15, 2023

Leave an online comment and learn more about the project by scanning the OR code!



WAYS TO PROVIDE A FORMAL COMMENT:



Submit an online comment form on our project website.



Email your comment to AllentownTruckReRoute@TukwilaWA.gov.



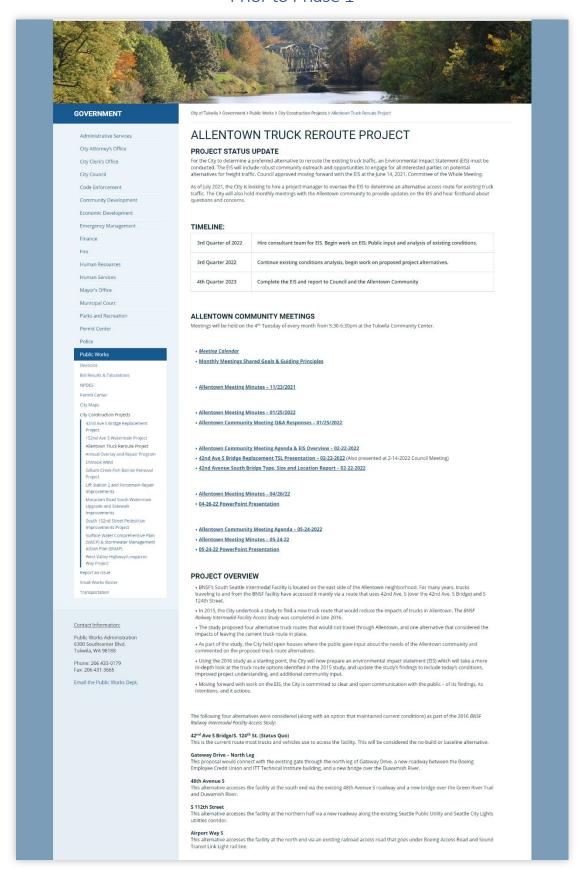
Mail your comment to Mark Hafs 6300 Southcenter Blvd. Suite 200, Tukwila, WA 98188

Mailer comments must be postmarked by March 15, 2023



Allentown Project Webpage

Prior to Phase 1



Prior to Phase 1 (cont.)



JOIN THE PROJECT MAILING LIST



FREQUENTLY ASKED QUESTIONS

Does the City of Tukwila have a preferred alternative access option to reroute freight traffic?

The City has no preferred option for alternative access to BMSPS facility. An EIS must be conducted for the City to determine a preferred alternative to reroute the existing truck 44ffic. The EIS will include robust community outreach and opportunities to engage for all interested parties on potential alternatives for freight traffic.

Does replacing the 42nd Ave 5 Bridge impact community efforts to reroute freight traffic from 5 124th St?

No. The work to replace the 42nd Ave 5 Bridge is a public safety project and has zero effect on the larger community effort to reroute freight traffic off of 5 124th St. The City of Tukwila is committed to collaborating with the Allentown community regard freight traffic through the neighborhood and that collaboration is an entirely separate effort from the 42nd Ave 5 Bridge replacement. Further, the City Council has directed staff to engage in an Environmental Impact Statement (EIS) process - a necessary step to determine a preferred alternative- to further evaluate alternatives for freight traffic on this route. The EIS process will have significant opportunities for community input.

How is the Environmental Impact Statement (EIS) being funded? City funds will cover the cost of the EIS.

The US Congress is considering spending trillions of dollars on infrastructure - has the City of Tukwila applied for those funds to reroute freight traffic?

runds to reroute freignt traffic?

The City has not applied for infrastructure funding to reroute traffic. The City must complete the EIS process in order to determine a preferred alternative and then begin design work before any such project would be a candidate for funding.

What is the role of BNSF in this process?
We anticipate that BNSF will be an engaged stakeholder in this process, and we are including them when we share informat where appropriate, including invalations to public meetings. As with the larger Allentown community, BNSF is an important stakeholder going forward regarding any conversations about rerouting freight traffic.

How can residents be involved in this process?

The City will continue to hold regular meetings with the Allentown community, and residents are encouraged to attend for updates and to ask questions, voice concerns, and suggest future actions. The truck reroute EIS process also includes opportunities for public comments, both at the project start and as part of review of the draft EIS. The City website will be updated to show upcoming public meetings and other opportunities give input.

Have you thought about developing a citizen task force about this issue?
The City has been working with the Allentown Advocates and will continue to work with them throughout the duration of these projects.

DOCUMENTS FROM 2016 SEPA CHECKLIST

- Open House Summary March 29, 2016
- BNSF Access Study Project Update August 10, 2015
- BNSF Access Study Project Fact Sheet July 2015

- Attachment B Geotech Report
- Attachment C Hazmat Alt Analysis
- Appendix B Environmental Database Research Reports
- Attachment D Cultural Resources Assessment
- Attachment E NW Maps Sensitive Areas

OTHER PAST STUDIES

Previous studies examined four alternative access routes in addition to a "no-action alternative" (maintaining the existing route). The following documents outline the previous studies' results and proces

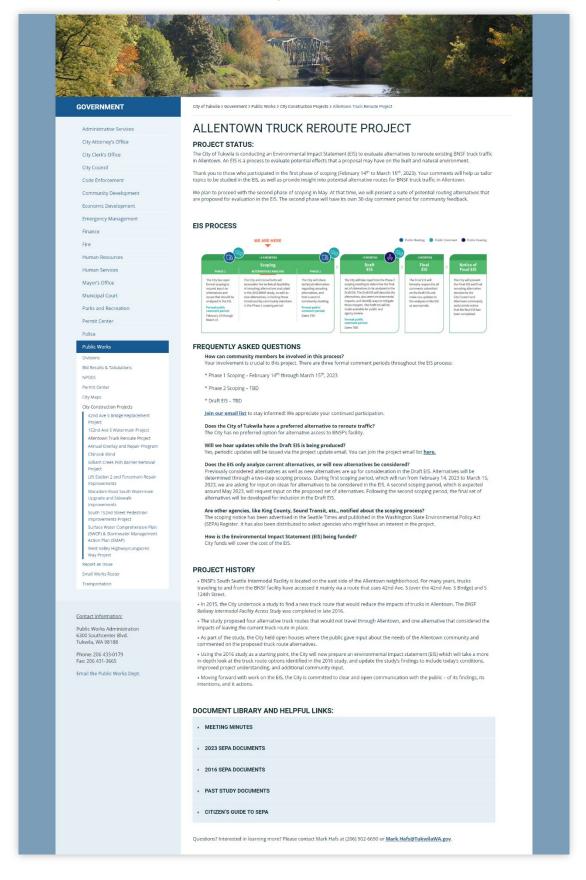
- March 10, 1998 HLA Study Report Presentation to Transportation Committee (File BNSF HLA 3.10.98)
- September 25, 2000 Council Presentation Packet (File 9.25, 2000)

GENERAL REFERENCE

- · Citizen's Guide to NEPA
- Guía para el Ciudadano sobre NEPA

Questions? Interested in learning more? Please contact Mark Hafs at 206-431-3685 or Mark.Hafs@TukwilaWA.gov

During Phase 1



PHASE 2

May 3, 2023 – June 1, 2023

Mailed Postcard

ALLENTOWN TRUCK REROUTE PROJECT

ENVIRONMENTAL REVIEW PROCESS



Thank you for participating in the City of Tukwila's

first phase of scoping for the Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown! We appreciate your insights and look forward to your continued participation in the second phase of scoping.

We are excited to share the truck reroute alternatives that will be studied in the EIS. There will be a formal 30-day comment period from May 3rd through June 1st, where you're invited to provide feedback on the proposed alternatives.

To learn about the alternative routes and provide comments, visit our project page.

Scan QR code to learn more and leave a comment!



The formal

comment period

for the second phase of scoping

is May 3rd

through June 1st. Scan QR code to learn more and

Attend our community meeting on May 23rd, 5:30 - 7 p.m.

WHERE: Tukwila Community Center 12424 42nd Ave S, Tukwila, WA 98168



WHEN: May 23rd, 2023 at 5:30 - 7 p.m.

Learn more about the alternatives, provide formal comments, ask the project team questions, and

WE ARE HERE

SCOPING PHASE 2

MAY 3 - JUNE 1

The City will share the truck reroute alternatives being considered in the EIS and gathering feedback.

COMPLETE

SCOPING PHASE 1

FEB. 14 - MAR. 15

The City requested community input on rerouting alternatives, as well as, topics that should be studied in the EIS.

Join us for our next community meeting!

After reviewing your comments from the first phase of scoping, the City is ready to share the truck reroute alternatives that will be studied in the Environmental Impact Statement. Join us for a community meeting on May 23rd to learn more about the alternatives, ask the project team questions, and provide comments. To request an interpreter please send an email to the address below by May 15th.

QUESTIONS?

Please contact Mark Hafs

EMAIL: AllentownTruckReRoute@TukwilaWA.gov

Nos complace compartir las alternativas de una nueva ruta para el tráfico de camiones que no afectará las calles de Allentown. Lo invitamos a conocer y comentar las alternativas de desvío de camiones del 3 de mayo al 1 de junio. Sus aportes nos ayudarán a elegir las alternativas que se evaluarán en la Declaración de Impacto Ambiental (Environmental Impact Statement, EIS). Gracias por participar en la primera fase del estudio del alcance. Sus comentarios nos han permitido limitar las opciones alternativas y a comprender mejor las necesidades de la comunidad.

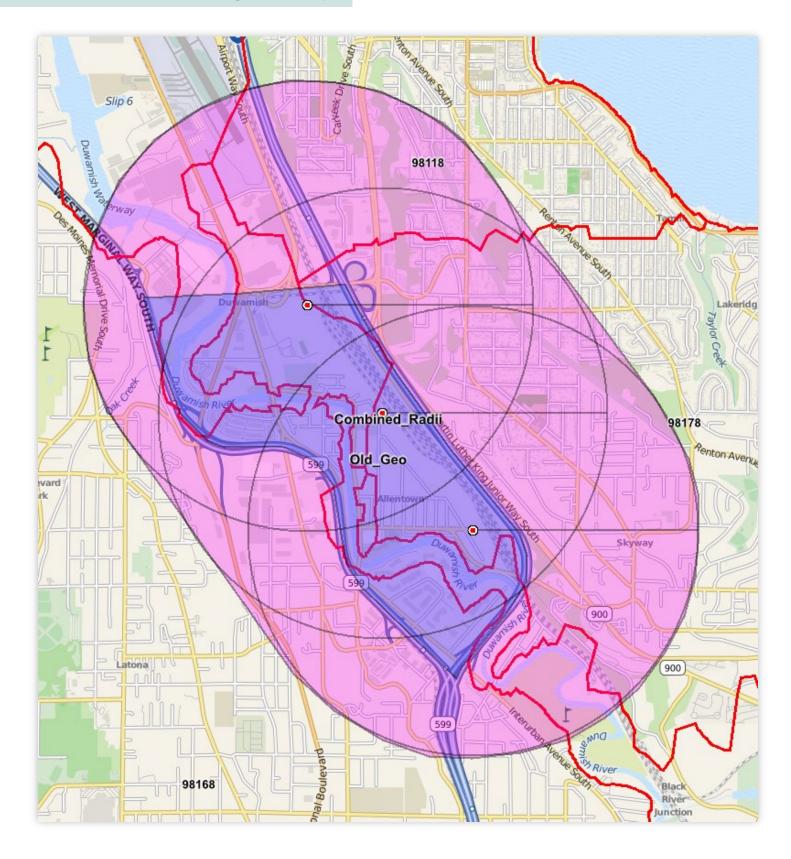
Chúng tôi rất vinh dự được chia sẻ những biện pháp thay thế mới nhằm giải tỏa phương tiện mà không sử dụng đến những con phố tại Allentown! Bạn được mời tới dự khán và để lại nhận xét vẻ các biện pháp thay thể nhằm giải tỏa phương tiện từ ngày 3 tháng 5 cho đến hết ngày 1 tháng 6. Thông tin đầu vào từ phia bạn sẽ giữp chúng tôi lựa chọn xem biện pháp thay thể nào sẽ được nghiên cứu trong Tuyển bố về Anh hướng Môi trường (Crwironmental Impact Statement, EIS). Cảm ơn bạn đã tham gia vào giai đoạn định hình đầu tiện. Phán hỗi của bạn giữp chúng tôi thu hẹp các lựa chọn về biện pháp thay thể và hiểu rõ hơn về nhu cầu của cộng đồng.

Waxaa farxad noo ah in aanu idinla wadaagno jid kale oo noqonaya jidka cusub ee gaadiidka waawayn ay doonaan aan isticmaalaynin jidadka Allentown! Waxaa lagugu soo casuumay in aad eegto oo aad ka dhiibato fikirkaaga jidka gaadiidka waawayn ee kale laga bilaabo Maay 3deeda ilaa Juun 1 deeda. Waxa aad naga caawin doontaa doorashada jidka kale ee lagu samayn doono daraasada Bayaanka Saamaynta Deegaanka (EIS). Waad ku mahadsan tahay ka qayb galkaaga wajiga kowaad ee baaxada. Fikirkaagu waxa uu naga caawin doonaa in aanu soo koobno ikhtiyaarada oo aanu si dhaanta u fahanto baahiyaha bulshada.



6200 Southcenter Boulevard Tukwila, WA 98188

Mailed Postcard: Delivery Area Map



Seattle Times Legal Notice

(May 3, 2023)

A6 News | The Scattle Times | WEDNESDAY, MAY 3, 2023

PUBLIC NOTICES

Public Notices

Public Notices CON of Lake Proper Park PVBLIC MOTICE MATTER OF POBLICE THURSHAP, MAY 11, 1910 - Pris Pus. Presented Code Amendments reserving Beliefer Wells

CITY OF MEMORATE ENOUGH OF DESCRIPTION OF DESCRIPTI

Public Hearing: April 15, 2022 before the Hearing Examiner

American Per Mich. 31.11.00. (solicitation of the decision in sections of the decision in sections with the period of the decision in sections with the period of the decision of the decision. Factors in SCA 10.101.01, afterwise the present of the period of the decision of the period of the decision of

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Public Notices

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Protect Name: City of Covingino Siz-Tear Transportation Improvement Pro-gram (YIP) 5804-5815

NOTICE OF PERMIT APPLICATIONS

Public Notices

COMMENT PROCEDURES DL2 will lines of decision on this semicifies before as this semicifies before the comment of the comment o

Application Named Tile Numbers: Kantowed Heights - Horsewater Variance, 5,073-444

Estating Decuments Indian Variance Application and Design Variance Name

KIRKLAND & BLANC LP Affects of Labora Party Affect Christopher L. Hartman Bill Labiation Ave Bear Yerk, New York 19822 Tel: 1213 486-478 Part 1973 486-478

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Request for Proposal

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Connect

with the Northwest's largest newspaper readership.

Request for Proposal

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CITY OF TUKWILA CITY OF TUKWILA Second Notice* REQUEST FOR FURTHER COMMENTS ON SCOPE OF ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR A PREVIOUSLY ISSUED DETERMINATION OF SIGNIFICANCE (DS) Project Name: Allentown Truck Reroute Project

*The City of Tukwila issued a Determination of Significance (DS) and Scoping Notice for the Allentown Truck Reroute EIS Project on February 14, 2023. The notice was focused on public comment regarding Tukwila's plan to identify alternative routes for the heavy freight truck traffic that uses surface streets in Tukwila's Allentown Neighborhood to access BNSF's South Seattle Intermodal Facility. This second scoping notice is being issued to invite the public, tribal governments, agencies, and other stakeholders to provide input on a suite of proposed alternatives for the project and/or provide additional or updated comments on the scope of the EIS.

Lead Agency: City of Tukwila

Project Location: Allentown, City of Tukwila

Description of the Proposal: BNSF Railway owns the South Seattle Intermodal Facility on the east side of the Allentown neighborhood in the City of Tukwila. The intermodal facility transfers containers from trucks to railroad cars and vice versa. Incoming trucks occessing the intermodal facility currently access if from the S. 129th St. Bridge to S. 50th Place. Outgoing trucks leaving the facility can use either the S. 129th Street Bridge or take S 124th Street to the 42nd Ave S. Bridge. After the planned replacement of the 42nd Ave. S Bridge, truck traffic will also be able to access the intermodal facility by traveling east on the bridge, and reaching the facility via S 124th Street. In order to improve livability and safety in Allentown without compromising the operations of the yard, the City is evaluating new potential truck access routes to the intermodal facility.

Environmental Determination: The City of Tukwila, as the SEPA lead agency, has determined this proposal may have significant adverse environmental impacts on the environment. An EIS is required under RCW EIS is required under RC 43.21C.030(2)(c) and will be prepared.

Elements of the Environment: WAC 197-11 establishes that an EIS shall pro-vide a level of detail commensural with the importance of the impact. The City has preliminarily identified the fol-lowing elements of the environment for analysis in the EIS:

- Geology/Soils Water Resources
 Public Services and Utilities
 Plants and Animals
 Land and Shoreline Use
 Cultural Resources
 Recreation Environmental Justice
 Health and Safety Noise
 Transportation and Traffic
 Visual Resources
 Air Quality

Alternatives: The City is seeking input from the public and stakeholders on potential alternative truck routes that could improve livability and safety in Allentown without compromising the operations of the intermodal yard. The City is considering the following alternatives:

Alternative 1: New route from the north end of the intermedal Yard along S. 112th Street between the intermedal yard and Marsinal Way S.
 Alternative 2: New roadway from the north end of the intermedal Yard, under S. Boeing Access Road to a new signalized intersection at Airport Way S.

S.

Alternative 3: New route from the south end of the Intermodal Yard to 51st Place S to a new bridge over the Duwamish River to 48th Place South to a newly constructed road to Gateway Drive to Interurban Ave S.

Alternative 4: New route from the south and of the Intermodal Yard to a

The Hazelnut - online version

(April 2023 edition)

Stay engaged in the Allentown Truck Reroute Project



Thank you to everyone that participated in the City of Tukwila's first phase of scoping for the Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown!

We've reviewed your comments from the first phase and are ready to share feasible rerouting alternatives. There will be a formal 30-day comment period from May 3 through June 1 to collect feedback on the alternatives.

Here's how to learn more and provide comments:

Attend our Community Meeting on May 23

Where: Tukwila Community Center When: May 23, 2023 from 5:30pm - 7pm

To request an interpreter, please email <u>AllentownTruckReRoute@TukwilaWA.gov</u> by May 15.

- · Submit an online comment form on our project website
- Email your comment to <u>AllentownTruckReRoute@TukwilaWA.gov</u>
- Mail your comment (must be postmarked by June 1, 2023) to Mark Hafs:

6300 Southcenter Blvd. Suite 200

Tukwila W∆ 98188

Allentown Mailing List E-Newsletter (May 3 and June 23)



May 3, 2023

Hello community members,

Thank you to those who participated in the City of Tukwila's first phase of scoping for the Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown!

We are now kicking off the second phase of scoping by sharing the truck route alternatives that will be studied in the EIS. You can find maps of each of the alternatives on the **project website**. The formal 30-day comment period is **May 3 through June 1, 2023.** Please share your feedback on the potential alternatives, as well as other final input you may have as we prepare to develop the EIS.

The City will also be hosting a **community meeting on May 23** for you to learn more about the alternatives, ask the project team questions, and provide comments.

Ways to stay engaged:

 Attend our Community Meeting on May 23 and provide your written comment in person.

Where: Tukwila Community Center (12424 42nd Ave 5, Tukwila, WA 98168) When: May 23, 2023 from 5:30pm – 7pm

To request an interpreter, please email

AllentownTruckReRoute@TukwilaWA.gov by May 15.

- . Submit an online comment form on our project website
- Email your comment to AllentownTruckReRoute@TukwilaWA.gov
- . Mail your comment to Mark Hafs:

6300 Southcenter Blvd. Suite 200

Tukwila, WA 98188

Mailed comments must be postmarked by June 1, 2023

Nos complace compartir las alternativas de una nueva ruta para el tráfico de camiones que no afectará las calles de Allentown. Lo invitamos a conocer y comentar las alternativas de desvío de camiones del 3 de mayo al 1 de junio. Sus aportes nos ayudarán a elegir las alternativas que se evaluarán en la Declaración de Impacto Ambiental (Environmental Impact Statement, EIS). Gracias por participar en la primera fase del estudio del alcance. Sus comentarios nos han permitido limitar las opciones alternativas y a comprender mejor las necesidades de la comunidad.

Chúng tôi rất vinh dự được chia sẻ những biện pháp thay thế mới nhằm giải tòa phương tiện mà không sử dụng đến những con phổ tại Allentown! Bạn được mời tới dự khán và để lại nhận xét về các biện pháp thay thế nhằm giải tòa phương tiện từ ngày 3 tháng 5 cho đến hết ngày 1 tháng 6. Thông tin đầu vào từ phía bạn sẽ giúp chúng tôi lựa chọn xem biện pháp thay thế nào sẽ được nghiên cứu trong Tuyên bở về Ảnh hướng Môi trường (Environmental Impact Statement, EIS). Cám ơn bạn đã tham gia vào giai đoạn định hình đầu tiên. Phân hồi của bạn giúp chúng tôi thu hẹp các lựa chọn về biện pháp thay thế và hiểu rở hơn về nhu cầu của cộng đồng.

Waxaa farxad noo ah in aanu idinla wadaagno jid kale oo noqonaya jidka cusub ee gaadiidka waawayn ay doonaan aan isticmaalaynin jidadka Allentown! Waxaa lagugu soo casuumay in aad eegto oo aad ka dhiibato fikirkaaga jidka gaadiidka waawayn ee kale laga bilaabo Maay 3deeda ilaa Juun 1deeda. Waxa aad naga caawin doontaa doorashada jidka kale ee lagu samayn doono daraasada Bayaanka Saamaynta Deegaanka (EIS). Waad ku mahadsan tahay ka qayb galkaaga wajiga kowaad ee baaxada. Fikirkaagu waxa uu naga caawin doonaa in aanu soo koobno ikhtiyaarada oo aanu si dhaanta u fahanto baahiyaha bulshada.

Learn more about the project and view the route alternatives on our <u>website</u>. See you on May 23!



June 23, 2023

Greetings Allentown Community,

We hope this e-mail finds all of you well. We'll be taking a break from our regular inperson community meetings for the month of June, and resume meeting on July 25th. Thanks to everyone who attended our May 23rd Truck Reroute EIS open house, and to all of you who took time to submit comments on the truck reroute alternatives. We'll be returning to our typical presentation format on the 25th, including taking meeting minutes for your review. In the meantime, we wanted to update you on progress we've made on City projects in Allentown. We'll discuss these items in more detail at our July meeting, and please feel free to give us your feedback any time before then.

42nd Ave S Bridge Replacement Update.

The project designer, TranTech Engineering, has submitted 60% complete construction documents for the replacement bridge to the City. Recently implemented changes to permitting requirements of state and federal agencies is expected to delay project milestones, with construction now estimated to begin in 2025, not in 2024 as previously estimated, and completion of construction estimated to be in 2027. Please refer to the following link to access to the informational memo prepared for the City Council and the flowing link to the City Council presentation at the May 22, 2023 Committee of the Whole meeting, The presentation starts at time stamp 1:35:33. For more information, contact Adam Cox at adam.cox@tukwilawa.gov.

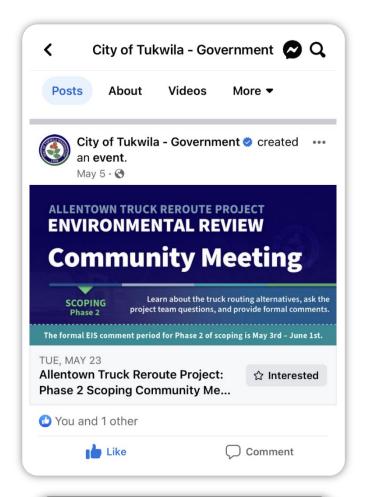
S 119th St /42nd Ave S Raised Crosswalk

The raised crosswalk at S 119th St and 42nd Ave S was incorporated into this year's overlay program after the City was awarded funding for the project from the State Transportation Improvement Board. The project will construct a raised crosswalk, install flashing beacon lights to alert motorists that pedestrians are crossing, and ensure ADA access between the street and the S 119th St pedestrian bridge. To maintain through-access on 42nd Ave S, one lane will remain open throughout construction. The window for construction of the crosswalk will begin on July 10, 2023, and the contractor will have 60 days to complete the work. We'll let you know as soon as we have a specific timeline for construction. For more information, contact Cyndy Knighton at cyndy.knighton@tukwilawa.gov.

Allentown Truck Reroute EIS

We have collected and evaluated comments submitted by the public and stakeholders during phase 2 of the scoping process, and are using that input to help select the reroute alternatives that will go forward for in-depth study as part of the EIS. In addition to considering public comment, the project planners and engineers will also assess the feasibility of the five alternatives presented at our May 23rd community meeting. Criteria for feasibility will include whether alternatives can be engineered and constructed, what impacts they could have on Allentown's environment and quality of life, whether alternatives could get required permits from regulatory agencies, and how likely the alternatives would be to get the state and federal funding we will need for planning, design, and construction. Based on the feasibility analysis, and input we received during the public comment period, the project team will choose three of the five alternatives for further study. We'll discuss the three selected alternatives at our July 25th meeting, and the reasons for choosing them, along with the next steps for work on the EIS. For more information, contact Mark Hafs at mark.hafs@tukwilawa.gov, and also check the Truck Reroute EIS project website, which will be updated as the project team makes progress.

Social Media: Event & Posts









Social Media: Boosting Schedule and Budget

Facebook Event Boost

Target Area BNSF facility (12200 51st PL S, Seattle, WA 98178) as geographic marker,

4-mile radius

Runtime May 16 through May 22

Budget \$100

Facebook Post Boost

Target Area BNSF facility (12200 51st PL S, Seattle, WA 98178) as geographic marker,

4-mile radius

Runtime May 26 through May 31

Budget \$100

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
4/30	5/1	5/2	5/3 Scoping Starts	5/4 Create FB event	5/5	5/6
5/7	5/8 Twitter post #1	5/9	5/10	5/11	5/12	5/13
5/14	5/15	5/16 Boost FB event	5/17	5/18	5/19	5/20
5/21	5/22	5/23 Comm Mtg	5/24 Twitter post #2	5/25	5/26 Boost FB post	5/27
5/28	5/29	5/30	5/31	6/1 Scoping Ends	6/2	6/3

Tukwila Community Center Poster

Pre-Community Meeting

ALLENTOWN TRUCK REPOUTE PROJECT

ENVIRONMENTAL REVIEW PROCESS



Thank you for participating in the City of Tukwila's first phase

of scoping for the Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown!

We've reviewed your comments from the first phase of scoping and are excited to share the truck reroute alternatives that will be studied in the EIS.

There will be a formal 30-day comment period from May 3rd through June 1st, where you're invited to provide feedback on the proposed alternatives.

SAVE THE DATE



Join us for a community meeting on Tuesday, May 23rd

from 5:30–7pm at the Tukwila Community Center

For translation services, please email AllentownTruckReRoute@ TukwilaWA.gov by May 15th.

Ways to provide a formal scoping comment:



Submit an online comment form on our project website.



Email your comment to AllentownTruckReRoute@TukwilaWA.gov.



Mail your comment to Mark Hafs 6300 Southcenter Blvd. Suite 200, Tukwila, WA 98188

> Mailer comments must be postmarked by June 1, 2023

Formal phase 2 scoping period:

May 3, 2023 through June 1, 2023

Learn more about the project and leave an online comment by scanning the QR code!





Post-Community Meeting

ALLENTOWN TRUCK REROUTE PROJECT

ENVIRONMENTAL REVIEW PROCESS



We are excited to share the truck route alternatives that will

be studied in the Environmental Impact Statement (EIS) to address existing BNSF truck traffic in Allentown!

Community members are invited to **view** the routing alternatives and comment on them from May 3rd through June 1st.

Thank you for participating in the first phase of scoping. Your feedback helped us narrow down alternative options and better understand the needs of the community.

Formal phase 2 scoping period:

May 3, 2023 through June 1, 2023

Learn more about the project and leave an online comment by scanning the QR code!







Submit an online comment form on our project website.





Email your comment to AllentownTruckReRoute@TukwilaWA.gov.

Ways to provide a formal scoping comment:



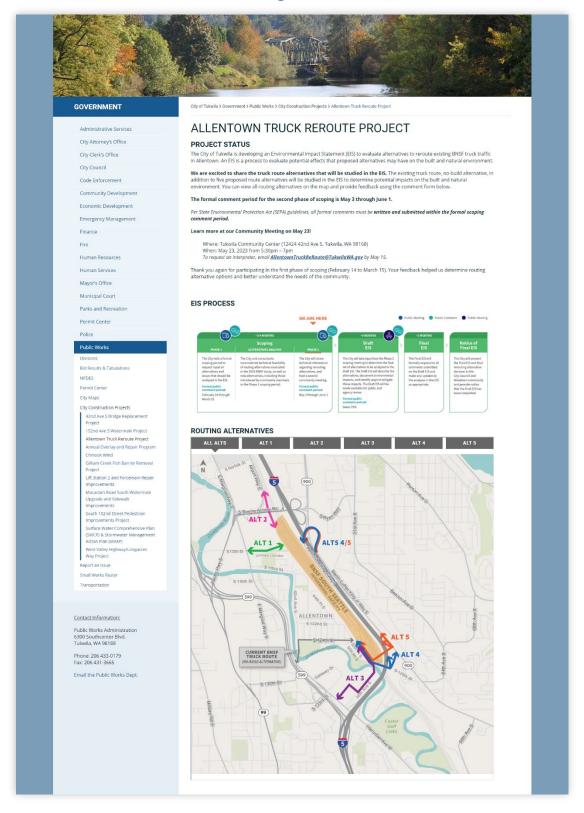
Mail your comment to Mark Hafs 6300 Southcenter Blvd. Suite 200, Tukwila, WA 98188

> Mailer comments must be postmarked by June 1, 2023



Allentown Project Webpage

During Phase 2



During Phase 2 (cont.)

WRITE A COMMENT FREQUENTLY ASKED QUESTIONS How can community members be involved in this process? Your involvement is crucial to this project. There are three formal comment periods throughout the EIS process: · Phase 1 Scoping: February 14, 2023 - March 15, 2023 (complete) Phase 2 Scoping: May 3, 2023 – June 1, 2023 Draft EIS: TBD Join our email list to stay informed! We appreciate your continued participation. Does the City of Tukwila have a preferred alternative to reroute traffic? The City has no preferred option for alternative access to BNSFs facility. Will we hear updates while the Draft EIS is being produced? Yes, periodic updates will be issued via the project update email. You can join the project email list here. Does the EIS only analyze current alternatives, or will new alternatives be considered? The EIS will study five alternatives, as well as the existing route (status quo, no-build option). These five alternatives were determined through a two-step scoping process. In the first scoping period (February 14th, 2023 to March 15th, 2023) we asked for community input on ideas for alternatives to be considered in the EIS. The second scoping period (kdys 3th, 2023 to June 11s, 2023) requests input on the proposed alternatives developed based on that input, previously studied alternatives and new options developed by the project team. Are other agencies, like King County, Sound Transit, etc., notified about the scoping process? Legal notices, for both the first and second phases of scoping, have been published in the Seattle Times and the Washington State Environmental Policy Act (SEPA) Register. It has also been distributed to select agencies and businesses who might have an interest in the project. How is the Environmental Impact Statement (EIS) being funded? City funds will cover the cost of the EIS. PROJECT HISTORY • BNSFs South Seattle Intermodal Facility is located on the east side of the Allentown neighborhood. For many years, trucks traveling to and from the BNSF facility have accessed it mainly via a route that uses 42nd Ave. 5 (over the 42nd Ave. 5 Bridge) and 5 124th Street. • In 2015, the City undertook a study to find a new truck route that would reduce the impacts of trucks in Allentown. The BNSF Railway Intermodal Facility Access Study was completed in late 2016. • The study proposed four alternative truck routes that would not travel through Allentown, and one alternative that considered the impacts of leaving the current truck route in place. As part of the study, the City held open houses where the public gave input about the needs of the Allentown community and commented on the proposed truck route alternatives. Using the 2016 study as a starting point, the City will now prepare an environmental impact statement (EIS) which will take a more in-depth look at the truck route options identified in the 2016 study, and update the studys findings to include today's conditions, improved project understanding, and additional community input. Moving forward with work on the EIS, the City is committed to clear and open communication with the public – of its findings, its intentions, and it actions. DOCUMENT LIBRARY AND HELPFUL LINKS MEETING MINUTES > 2023 SEPA DOCUMENTS > 2016 SEPA DOCUMENTS ► CITIZEN'S GUIDE TO SEPA Questions? Interested in learning more? Please contact Mark Hafs at (206) 902-6690 or Mark.Hafs@TukwilaWA.gov.



APPENDIX C

COMMUNITY MEETING MATERIALS



PHASE 1

Community Meeting – February 28, 2023

Presentation



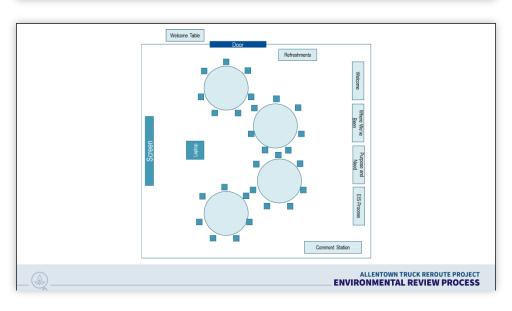


Welcome and Introductions

CITY OF TUKWILA • Mark Hafs, EIS Project Manager CITY OF TUKWILA (FACILITATORS) • Josh Hartley, Dept PW Director • Brittany Robinson, Analyst HDR • Adam Teepe, EIS Project Manager • Dennis Sandstrom, Public Involvement Manager • Cami Shigaya, Public Involvement Coordinator • Hernann Ambion, Public Involvement Coordinator

2 Room Tour

ALLENTOWN TRUCK REROUTE PROJECT
ENVIRONMENTAL REVIEW PROCESS



Project Overview

Informing Steps



- BNSF's South Seattle Intermodal Facility is located on the east side of the Allentown neighborhood. For many years, trucks traveling to and from the BNSF facility have accessed it mainly via a route that uses 42nd Ave. S (over the 42nd Ave. S Bridge) and S 124th Street.
- In 2015, the City undertook a study to find a new truck route that would reduce the impacts of trucks in Allentown. The BNSF Railway Intermodal Facility Access Study was completed in late 2016.
- The study proposed four alternative truck routes that would not travel through Allentown, and one alternative that considered the impacts of leaving the current truck route in place



ALLENTOWN TRUCK REROUTE PROJECT
ENVIRONMENTAL REVIEW PROCESS

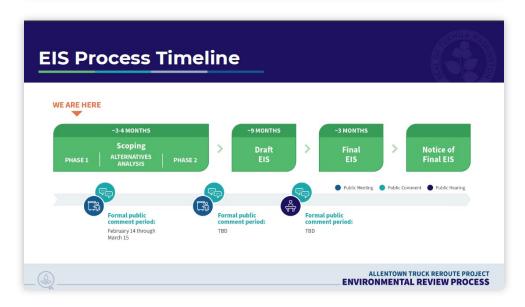


- As part of the study, the City held open houses where the public gave input about the needs of the Allentown community and commented on the proposed truck route alternatives.
- Using the 2016 study as a starting point, the City is now preparing an Environmental Impact Statement (EIS) which will take a more in-depth look at the truck route options and update the study's findings to include today's conditions, improved project understanding, and additional community input.

ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS







Share your input



- Formal comment period ends March 15th
- Scoping input:
 - · Rerouting alternatives to consider
 - · Topics to study in the EIS
- Multiple ways to provide your comment:
 - Submit an online comment on our project website (QR code to the website is in the handout and on the Welcome board)
 - **Email** your comment to AllentownTruckReRoute@TukwilaWA.gov
 - Mail your comment to Mark Hafs (postmarked by March 15) 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188



ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS

5 Small Group Discussions

Discussion Points



- What alternatives should the City consider?
 - Why a particular alternative?
 - Pros/cons
- What topics should we study as we analyze alternatives?
 - Physical environment (climate, geology, soil type and distribution, groundwater characteristics, air quality, noise levels)
 - Biological environment (location and distribution of flora and fauna wildlife characteristics)
 - Socio-economic and health conditions (demography, culture, heritage sites, social and health status of the people and their environment)

All formal scoping comments must be written. The formal comment period ends March 15th.



ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



Informational Boards (24"x36")





PURPOSE AND NEED

The purpose and need for this project is to develop an alternative route to the BNSF Intermodal Facility in Allentown to improve livability and safety in Allentown, without compromising the operations of the intermodal facility.

TOPICS CURRENTLY BEING CONSIDERED

- PHYSICAL ENVIRONMENT

 Climate, geology, soil type and distribution, groundwater characteristics, air quality, and noise levels
- **BIOLOGICAL ENVIRONMENT**Location and distribution of flora and fauna wildlife characteristics
- SOCIO-ECONOMIC AND HEALTH CONDITIONS

 Demography, culture, heritage sites, social and health status of the people and their environment

WHAT MAKES A GOOD COMMENT?

Throughout the EIS process, there will be periods during which the public is invited to submit comments.

- → All comments must be written, and must be legible.
- → Be specific about issues and locations.
- → All comments must be submitted during formal comment periods.



ALLENTOWN TRUCK REROUTE PROJECT ENVIRONMENTAL REVIEW PROCESS

WHERE WE'VE BEEN

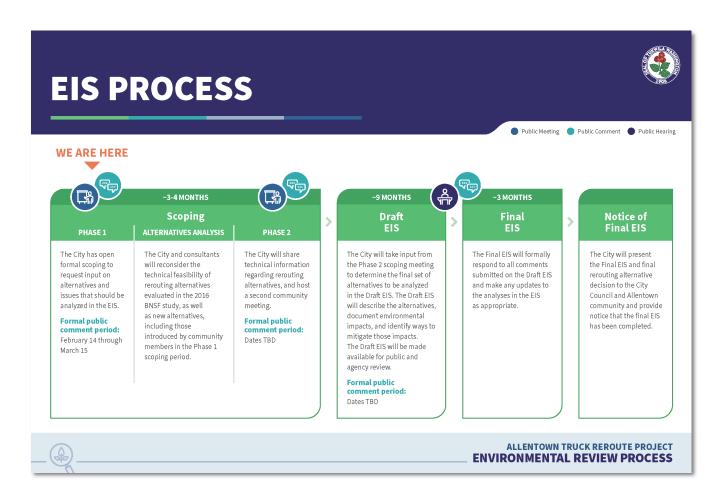


INFORMING STEPS

- BNSF's South Seattle Intermodal Facility is located on the east side of the Allentown neighborhood. For many years, trucks traveling to and from the BNSF facility have accessed it mainly via a route that uses 42nd Ave. S (over the 42nd Ave. S Bridge) and S 124th Street.
- 2 In 2015, the City undertook a study to find a new truck route that would reduce the impacts of trucks in Allentown. The BNSF Railway Intermodal Facility Access Study was completed in late 2016.
- 3 The study proposed four alternative truck routes that would not travel through Allentown, and one alternative that considered the impacts of leaving the current truck route in place.
- As part of the study, the City held open houses where the public gave input about the needs of the Allentown community and commented on the proposed truck route alternatives.
- Using the 2016 study as a starting point, the City will now prepare an environmental impact statement (EIS) which will take a more in-depth look at the truck route options identified in the 2016 study, and update the study's findings to include today's conditions, improved project understanding, and additional community input.
- 6 Moving forward with work on the EIS, the City is committed to clear and open communication with the public of its findings, its intentions, and it actions.



ALLENTOWN TRUCK REROUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



FREQUENTLY ASKED QUESTIONS:

Leave a scoping comment! The formal EIS scoping comment period is **February 14, 2023** to March 15, 2023.

During this time, we invite you to share your input on what issues and alternatives we should analyze in the EIS. There are multiple ways to provide a comment:

In-person – Submit your comment in-person during today's community meeting.

Submit an online comment form on our project website.

Email your comment to AllentownTruckReRoute@TukwilaWA.gov.

Mail your comment to Mark Hafs

6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188 Mailed comments must be postmarked by March 15, 2023

Can I submit more than one scoping comment?

Yes, submit your scoping comments between February 14, 2023 and March 15, 2023.

Does the City of Tukwila have a preferred alternative to reroute traffic?

The City has no preferred option for alternative access to BNSF's facility.

Will we hear updates while the Draft EIS is being produced?

Yes, periodic updates will be issued via the project update email. You can join the project email list on our website. Scan the QR code on the front cover.

Does the EIS only analyze current alternatives, or will new alternatives be considered?

Previously considered alternatives as well as Previously considered alternatives as well as new alternatives are up for consideration in the Draft EIS. Alternatives will be determined through a two-step scoping process. During the first scoping period, which will occur from February 14, 2023 to March 15, 2023, we are asking for input on ideas for alternatives to be considered in the EIS. A second scoping period, which is repreted around May 2073. De considered in the LIS. A second scoping period, which is expected around May 2023, will request input on the proposed set of alternatives. Following the second scoping period, the final set of alternatives will be developed for inclusion in the Draft EIS.

Are other agencies, like King County, Sound Transit, etc., notified about the

The scoping notice has been advertised in the Seattle Times and published in the Washington State Environmental Policy Act (SEPA) Register. It has also been distributed to select agencies who might have an interest in the project

How is the Environmental Impact Statement (EIS) being funded?

City funds will cover the cost of the EIS.

ALLENTOWN TRUCK REROUTE PROJECT **ENVIRONMENTAL REVIEW PROCESS**



OVERVIEW

The City of Tukwila is preparing an Environmental Impact Statement (EIS) to evaluate alternatives to reroute existing BNSF truck traffic in Allentown

An EIS is a process to evaluate potential effects that a proposal may have on the built and natural environment. The first step in the EIS is called scoping. Scoping is where we ask you to share your input on what issues and alternatives should be analyzed in the EIS. Per State Environmental Protection Act (SEPA) guidelines, all formal comments must be written and submitted within the formal scoping comment period.



The formal EIS scoping comment period is February 14th through March 15th. Here are ways you can provide input:

COMMENT OPTIONS



In-person – Submit your comment in-person during today's community meeting.



Submit an online comment form on our project website.



Email your comment to AllentownTruckReRoute@TukwilaWA.gov.



Mail your comment to Mark Hafs 6300 Southcenter Blvd. Suite 200, Tukwila, WA 98188 Mailer comments must be post rked by March 15, 2023

Scan QR code to learn more and leave a



PURPOSE AND NEED

develop an alternative route to the BNSF Intermodal Facility in Allentown to improve livability and safety in Allentown, without compromising the operations of the intermodal facility.

PROJECT HISTORY

- BNSF's South Seattle Intermodal Facility is located on the east side of the Allento neighborhood. For many years, trucks traveling to and from the BNSF facility have accessed it mainly via a route that uses 42nd Ave. S (over the 42nd Ave. S Bridge) and S 124th Street.
- In 2015, the City undertook a study to find a new truck route that would reduce the impacts of trucks in Allentown. The BNSF Railway Intermodal Facility Access Study was completed in late 2016.
- The study proposed four alternative truck routes that would not travel through Allentown, and one alternative that considered the impacts of leaving the current truck route in place
- As part of the study, the City held open houses where the public gave input about the needs of the Allentown community and commented on the proposed truck route alternatives.
- Using the 2016 study as a starting point, the City will now prepare an environmental impact statement (EIS) which will take impact statement (EIS) which will take a more in-depth look at the truck route options identified in the 2016 study, and update the study's findings to include today's conditions, improved project understanding, and additional community input.
- Moving forward with work on the EIS, the City is committed to clear and oper communication with the public – of its findings, its intentions, and it actions.

EIS PROCESS

The City has open

formal scoping to request input on alternatives and issues that should be analyzed in the EIS.

Formal public

February 14 through March 15



-3-4 MONTHS

The City and consultants will reconsider the technical feasibility of rerouting alternatives evaluated in the 2016 BNSF study, as well as new alternatives, including those introduced by community members in the Phase 1 scoping period.

The City will share technical information

regarding rerouting alternatives, and host a second community meeting.

(民)

Dates TBD

(Å

The City will take input from the Phase 2 The City will take input from the Phase 2 scoping meeting to determine the final set of alternatives to be analyzed in the praft EIS. The Draft EIS will describe the alternatives, document environmental impacts, and identify ways to mitigate those impacts. The Draft EIS will be made available for public and agency review. agency review.

Dates TBD

Public Meeting Public Comment Public Hearing

The Final EIS will formally respond to all comments submitted on the Draft EIS and make any updates to the analyses in the EIS as appropriate.

The City will present the Final EIS and final the Final EIS and fina rerouting alternative decision to the City Council and Allentown communit and provide notice that the final EIS has been completed.

STUDY AREA



TOPICS CURRENTLY BEING CONSIDERED

PHYSICAL ENVIRONMENT

Climate, geology, soil type and distribution, groundwater characteristics, air quality, and noise levels

BIOLOGICAL ENVIRONMENT Location and distribution of flora and fauna, wildlife characteristics

SOCIO-ECONOMIC AND HEALTH CONDITIONS

Demography, culture, heritage sites, social and health status of the people and their environment

WHAT MAKES A GOOD EIS COMMENT?

- Tell us about resources you'd like to protect and valuable sites in your community
- Be specific about issues and locations
- Write legibly
- All EIS comments must be written

All formal comments received during the formal comment period will be documented. The formal EIS scoping comment period is February 14, 2023 to March 15, 2023.

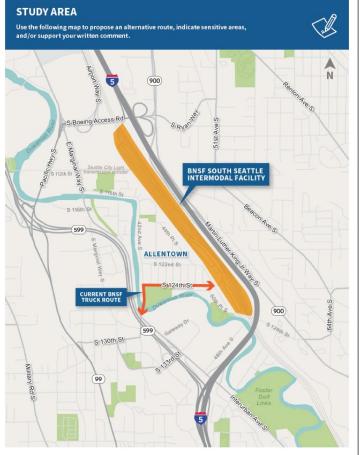
Share your input on what issues and alternatives should be analyzed in the EIS by March 15th



Paper Comment Form



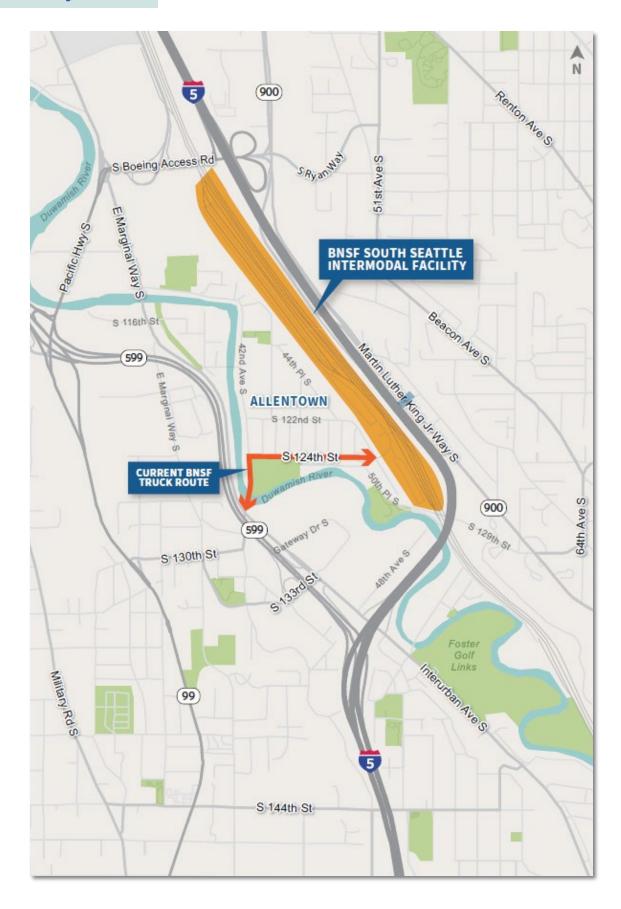
Turn over to draw route suggestions on the map



Comment Form

	stal Impact Statement (EIS) Scoping Comment Form			
Formal scoping period: February 14, 2023 through March 15, 2023 Scoping is where we ask you to share your input on what issues and alternatives should be analyzed in the EIS. Per State Environmental Protection Act (SEPA) guidelines, all formal comments must be written and submitted within the formal scoping comment period.				
Ways to pro	vide a formal comment:			
Attendin personal Subm Email Mail y 6300	d our Community Meeting on February 28th and provide your written comment to formail us by February 20th to request an interpreter) it an online comment form on our project website your comment to AllentownTruckReRoute@TukwilaWA.gov our comment (must be postmarked by March 15, 2023) to Mark Hafs: Southcenter Blvd. Suite 200 a, WA 98188			
Name				
First Name	Last Name			
	00-year-old tree at the intersection of X and Y that should not be disturbed during the rerouting			
process.				
Join our er Yes No				
Join our er Yes No I'm aire	nail list! ody signed up se provide your email			
Join our er Yes No I'm alre	nail list! ody signed up se provide your email			
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Join our er Yes No I'm alre	nail list! dy signed up se provide your email			

Roll plot: Project Area



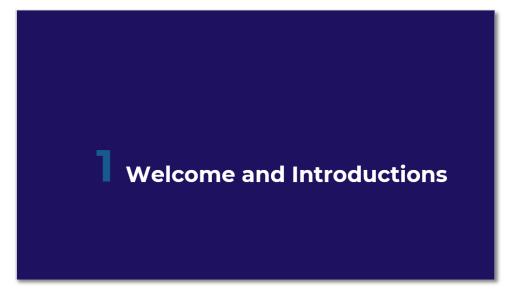
PHASE 2

Community Meeting – May 23, 2023

Presentation

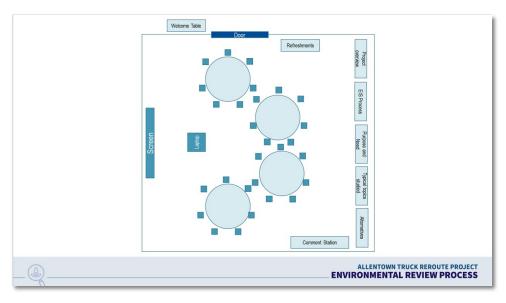












Project Overview

Past studies



- · BNSF's South Seattle Intermodal Facility is located on the east side of the Allentown neighborhood. For many years, trucks traveling to and from the BNSF facility have accessed it mainly via a route that uses 42nd Ave. S (over the 42nd Ave. S Bridge) and S 124th Street.
- In 2015, the City undertook a study to find a new truck route that would reduce the impacts of trucks in Allentown. The BNSF Railway Intermodal Facility Access Study was completed in late 2016.
- The study proposed four alternative truck routes that would not travel through Allentown, and one alternative that considered the impacts of leaving the current truck route in place



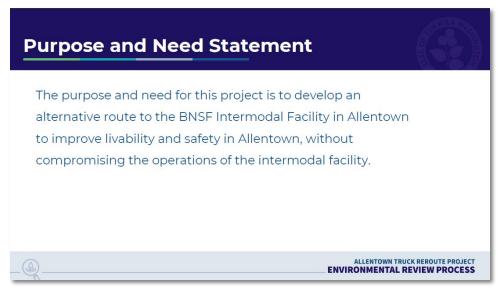
ALLENTOWN TRUCK REPOUTE PROJECT
ENVIRONMENTAL REVIEW PROCESS



- As part of the study, the City held open houses where the public gave input about the needs of the Allentown community and commented on the proposed truck route alternatives.
- Using the 2016 study as a starting point, the City is now preparing an Environmental Impact Statement (EIS) which will take a more in-depth look at the truck route options and update the study's findings to include today's conditions, improved project understanding, and additional community input.

ALLENTOWN TRUCK REPOUTE PROJECT
ENVIRONMENTAL REVIEW PROCESS







What we heard during Phase 1



- Topics
 - Impact on water and habitat of the Duwamish River
 - Noise impacts
 - Air quality/Greenhouse Gas impacts
 - Coordination with other agencies and infrastructure projects
- Alternatives
 - Interest in alternatives that enter the north part of the BNSF facility
 - Interest in an alternative that uses the SCL/PSE right-of-way
 - Interest in alternatives that enter the south part of the BNSF facility



ALLENTOWN TRUCK REPOUTE PROJECT
ENVIRONMENTAL REVIEW PROCESS

Share your input



- Formal comment period ends June 1st
- · Scoping input:
 - Feedback on alternatives that will be studied
 - Topics to study in the EIS
- Multiple ways to provide your comment:
 - **Submit an online** comment on our project website (QR code to the website is in the handout and on the Welcome board)
 - Email your comment to AllentownTruckReRoute@TukwilaWA.gov
 - Mail your comment to Mark Hafs (postmarked by June 1) 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188



ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS

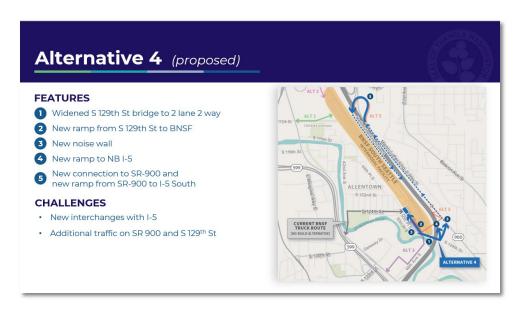


FEATURES 1 Seattle Public Utilities and Seattle City Light utilities corridor 2 New check-in/check-out location for BNSF Intermodal Facility Utilizes new roadway, alignment designed to avoid conflict with above ground and surface utilities CHALLENGES 1 Utility Corridor – 3 transmission lines and large diameter water line. 2 Right-of-way acquisition/easement for new road





· Reconfiguration of BNSF Intermodal Facility





How Alternatives will be Analyzed in the EIS

- · Alternatives are concepts; none have gone through full design yet
 - Enough design done to study their general potential impacts
- 5 alternatives and the no-action alternative
 - Alternatives reflect feedback from Phase 1 scoping
 - No preferred alternative at this time
 - Each alternative studied equally in EIS
 - Identify potential impacts on each topic
 - · Compared to each other
 - Formal comment period once Draft EIS released



ALLENTOWN TRUCK REPOUTE PROJECT
ENVIRONMENTAL REVIEW PROCESS

5 Small Group Discussions

• 4 topics, rotating leads • Alternatives 1 & 2 (Hernann) • Alternatives 3 (Dennis) • Alternatives 4 & 5 (Adam C.) • Topics to study in the EIS (Adam T.) • What topics should we study as we analyze alternatives? • Physical environment (climate, geology, soil type and distribution, groundwater characteristics, air quality, noise levels) • Biological environment (location and distribution of flora and fauna wildlife characteristics) • Socio-economic and health conditions (demography, culture, heritage sites, social and health status of the people and their environment) All formal scoping comments must be written. The formal comment period ends June 1st.



Informational Boards (24"x36")



PROJECT CONTACT

Mark Hafs

AllentownTruckReRoute@TukwilaWA.gov





PURPOSE AND NEED



The purpose and need for this project is to develop an alternative route to the BNSF Intermodal Facility in Allentown to improve livability and safety in Allentown, without compromising the operations of the intermodal facility.

TOPICS CURRENTLY BEING CONSIDERED

- PHYSICAL ENVIRONMENT
 Climate, geology, soil type and distribution, groundwater characteristics, air quality, and noise levels
- BIOLOGICAL ENVIRONMENT

 Location and distribution of flora and fauna wildlife characteristics
- SOCIO-ECONOMIC AND HEALTH CONDITIONS

 Demography, culture, heritage sites, social and health status of the people and their environment

WHAT MAKES A GOOD COMMENT?

Throughout the EIS process, there will be periods during which the public is invited to submit comments.

- → All comments must be written, and must be legible.
- → Be specific about issues and locations.
- → All comments must be submitted during formal comment periods.



ALLENTOWN TRUCK REROUTE PROJECT ENVIRONMENTAL REVIEW PROCESS

WHERE WE'VE BEEN

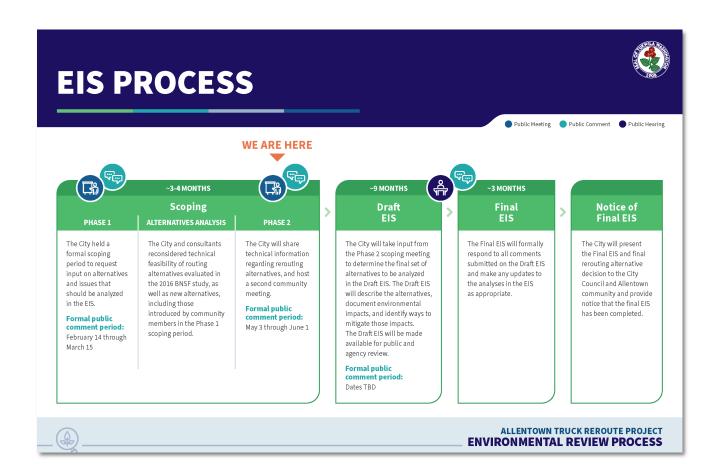


INFORMING STEPS

- BNSF's South Seattle Intermodal Facility is located on the east side of the Allentown neighborhood. For many years, trucks traveling to and from the BNSF facility have accessed it mainly via a route that uses 42nd Ave. S (over the 42nd Ave. S Bridge) and S 124th Street.
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- 4 As part of the study, the City held open houses where the public gave input about the needs of the Allentown community and commented on the proposed truck route alternatives.
- Using the 2016 study as a starting point, the City will now prepare an environmental impact statement (EIS) which will take a more in-depth look at the truck route options identified in the 2016 study, and update the study's findings to include today's conditions, improved project understanding, and additional community input.
- 6 Moving forward with work on the EIS, the City is committed to clear and open communication with the public of its findings, its intentions, and it actions.



ALLENTOWN TRUCK REROUTE PROJECT ENVIRONMENTAL REVIEW PROCESS



SUMMARY OF SCOPING PHASE 1



Formal Comment Period: February 14 through March 15

Community Meeting held on Tuesday, February 28

Total Comments Received: 55

TOPICS TO STUDY IN THE EIS

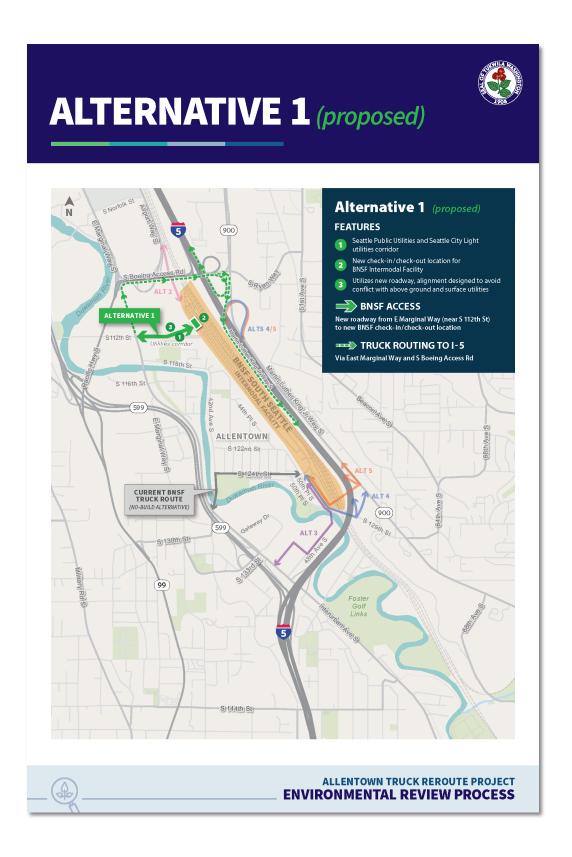
- Impact on water and habitat of the Duwamish River
- Noise impacts
- Air quality and greenhouse gas impacts
- Coordination with other agencies and infrastructure projects

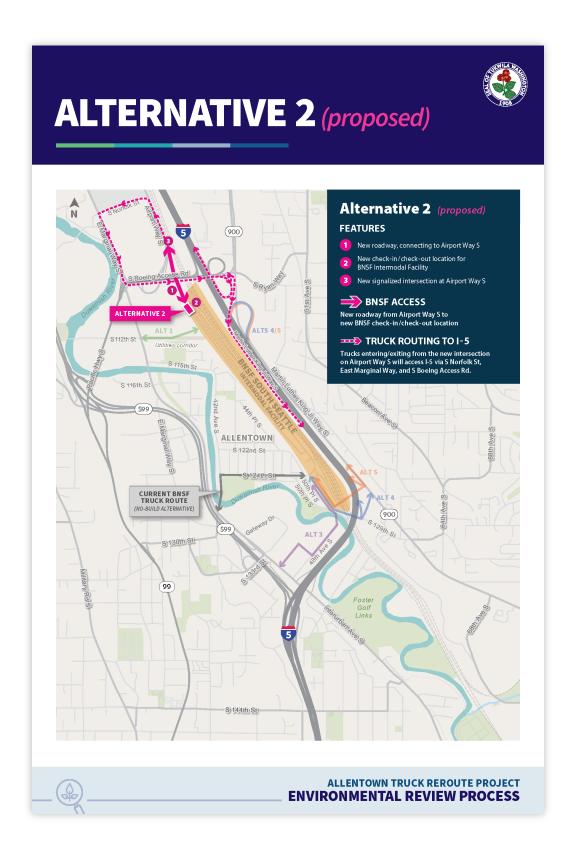
PREFERENCES FOR POTENTIAL ALTERNATIVES

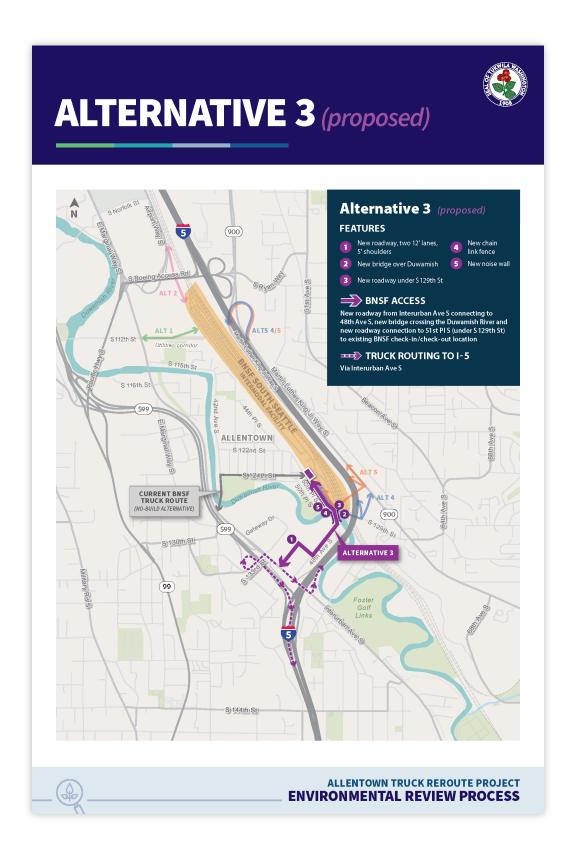
- Support for trucks to enter the northern end of the BNSF facility
- Support for routes that use the Seattle City Light/Puget Sound Energy right-of-way
- Support for trucks to enter the southern end of the BNSF facility

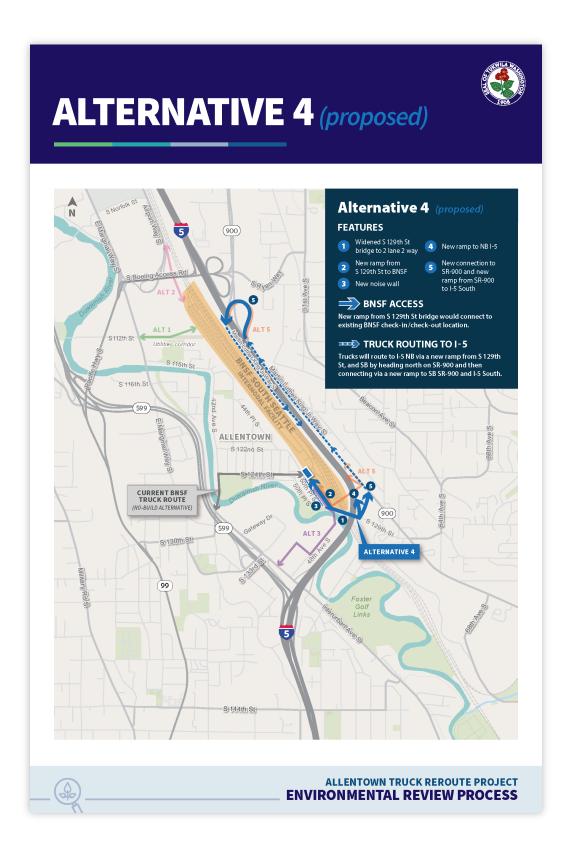


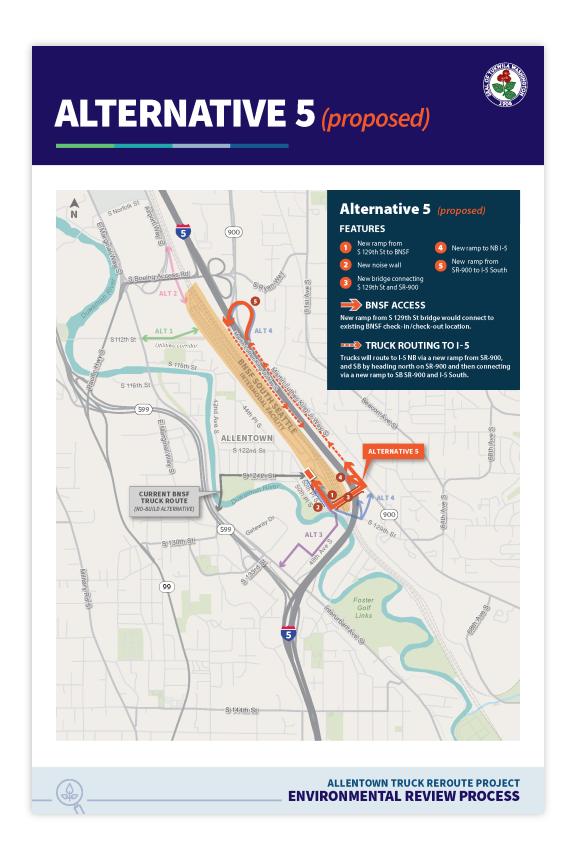
ALLENTOWN TRUCK REPOUTE PROJECT ENVIRONMENTAL REVIEW PROCESS













TOPICS CURRENTLY BEING CONSIDERED

- PHYSICAL
 ENVIRONMENT
 Climate, geology, soil type
 - Climate, geology, soil type and distribution, groundwater characteristics, air quality, and noise levels
- BIOLOGICAL
 ENVIRONMENT
 Location and distribution of flora
 and fauna, wildlife characteristics
- SOCIO-ECONOMIC AND HEALTH CONDITIONS
 Demography, culture, heritage sites, social and health status of the people and their environment

FREQUENTLY ASKED OUESTIONS

Can I submit more than one scoping comment?

Yes, submit your Phase 2 scoping comments between May 3, 2023 and June 1, 2023.

Does the City of Tukwila have a preferred alternative to reroute traffic?

The City has no preferred option for alternative access to BNSF's facility.

Will we hear updates while the Draft EIS is being produced?

Yes, periodic updates will be issued via the project update email. You can join the project email list on our website. Scan the QR code on the front cover.



OVERVIEW

The existing truck route in addition to five proposed route alternatives will be studied in the EIS to determine potential impacts on the built and natural environment. Tell us your thoughts on the alternatives and other topics that should be studied. Per state Environmental Protection Act (SEPA) guidelines, all formal comments must be written and submitted within the formal scoping comment period.



The formal EIS scoping comment period is May 3rd through June 1st

COMMENT OPTIONS









Scan QR code to learn more and leave a comment!



PURPOSE & NEED

Final EIS

The Final EIS will formally

respond to all comments submitted on the Draft EIS

and make any updates to the analyses in the EIS as appropriate.

The purpose and need for this project is to develop an alternative route to the BNSF Intermodal Facility in Allentown to improve livability and safety in Allentown, without compromising the operations of the intermodal facility.

WHAT MAKES A GOOD EIS COMMENT?

- Tell us about resources you would like to protect and valuable sites in your community
- Be specific about issues and locations
- Write legibly

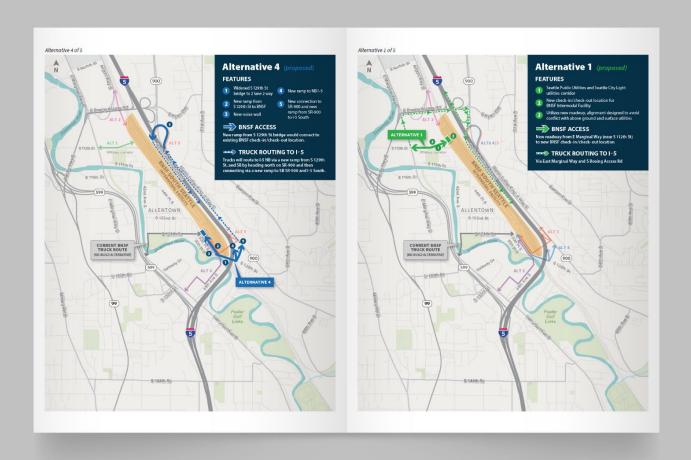
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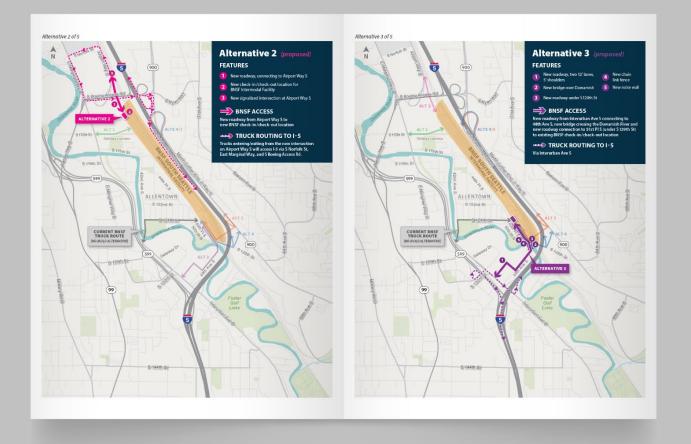
All EIS comments must be written

All formal comments received during the formal comment period will be documented. The formal EIS scoping comment period is May 3, 2023 to June 1, 2023.

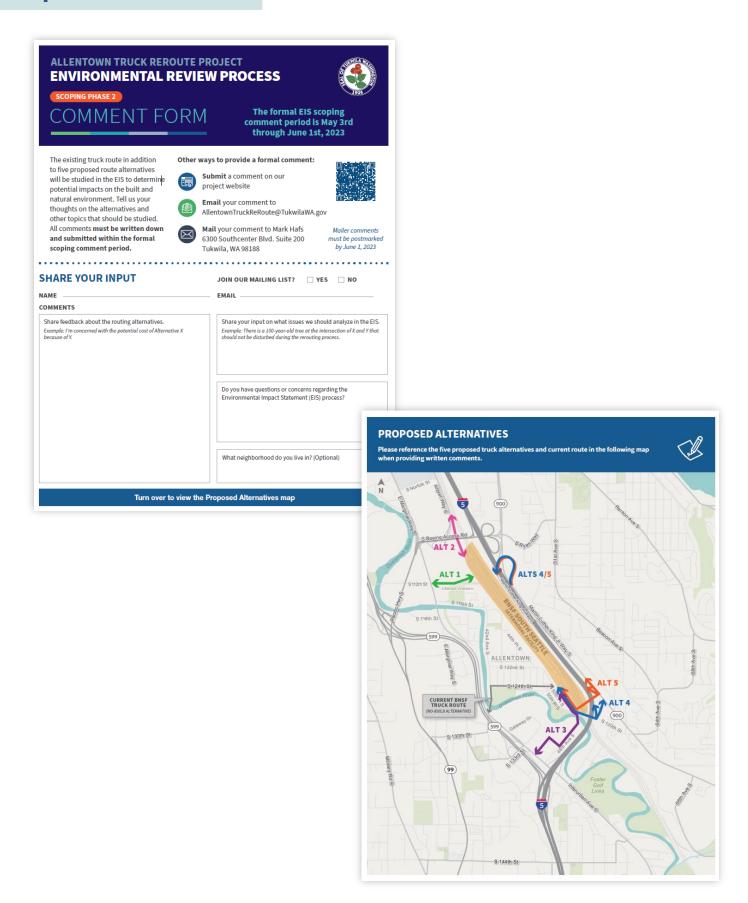








Paper Comment Form



Online Comment Form

Allentown Truck Reroute Project Environmental Impact Statement (EIS) Phase 2 Scoping Comment Form	
Phase 2 formal scoping period: May 3, 2023 through June 1, 2023 We are excited to share the truck route alternatives that will be studied in the EIS. Provide your feedback on the route alternatives by leaving a comment below. Per State Environmental Protection Act (SEPA) guidelines, all formal comments must be	
written and submitted within the formal scoping comment period.	
Ways to provide a formal comment: Attend our Community Meeting on May 23rd and provide your written comment in person. Tukwila Community Center (12424 42nd Ave S, Tukwila, WA 98168) May 23rd, 2023 from 5:30pm – 7pm To request an interpreter, email the address below by May 15th. Submit an online comment form on our project website. Email your comment to AllentownTruckReRoute@TukwilaWA.gov Mail your comment to Mark Hafs: 6300 Southcenter Blvd. Suite 200 Tukwila, WA 98188 Mailed comments must be postmarked by June 1, 2023	
Name First Name Last Name	
Share feedback about the routing alternatives *	Join our email list! Yes No I'm already signed up
Ex. I'm concerned with the potential cost of Alternative X because of Y. I like the idea of having the entry/exit point at "this" location, so I like Alternatives X and Y the best.	If yes, please provide your email
Share your input on what issues we should analyze in the EIS	Do you have questions or concerns regarding the EIS process? (Optional)
Ex. There is a 100-year-old tree at the intersection of X and Y that should not be distrubed during the rerouting process.	
	What neighborhood do you live in? (Optional)
	Submit

Roll plots: Proposed Alternatives

