

SR 509/Taylor Blvd Interchange

With the new traffic patterns for the Hylebos peninsula as discussed above, we request that WSDOT reconfigure the intersection at Taylor and SR 509 into a grade separated overpass as part of the SR 167/SR 509 project. The potential reduction in scope of the Alexander interchange would provide the opportunity for the Taylor/SR 509 interchange to be re-evaluated.

Grade Separated Rail Access across SR 509

There currently exists an "at grade" rail crossing of SR 509 just west of Alexander Avenue. A grade separated rail corridor for access to the Ceeco property is not considered in this DEIS. The proposed rail trackage will cross near the proposed siting of the southbound ramp SR 509 to SR 167 and will need to cross under the elevated SR167 near Alexander Avenue. The ramp design will need to consider the rail right-of-way and the elevated SR167 roadway needs to consider the railroad required 'envelope' dimensions. As this project moves from the EIS towards design, the Port will want to remain involved in the design of the area of the SR 167 connection to SR 509 with regards to potential encroachment on rail trackage in this immediate area. We have provided a proposed rail configuration plan as part of this response for your review.

SR 509 (old East/West Road) between Alexander Avenue and Taylor Blvd.

The existing dredge disposal site located south of SR 509 between Alexander and Taylor is primarily accessed from the SR 509 South Frontage Road. It appears this access corridor will remain with the relocation of the South Frontage Road closer to the North Frontage Road, and with SR167 crossing this area as an elevated roadway. The Port needs to maintain access to this area. This area is also being considered for potential development that would require rail access. Thus the previous comment concerning rail access applies directly to this comment as well.

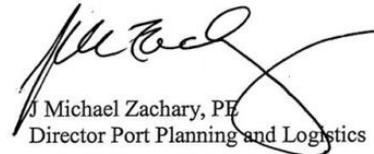
Traffic Data

In general we are also concerned that the traffic data developed during the study does not accurately reflect the current traffic patterns after the opening of the Port of Tacoma Road rail grade separation overpass. Nor does it take into account the new traffic patterns anticipated as discussed earlier in our comments. Thus we recommend that WSDOT carefully review new traffic data as part of your ongoing design. This summer, the Port of Tacoma and the City of Tacoma will be conducting an extensive Tidelands Traffic Circulation Study. We would be very willing to share the data from this study with you as part of the effort to construct SR 167.

We again thank you for this opportunity and we look forward to our continuing relationship on this project.

Sincerely,

PORT OF TACOMA



Michael Zachary, PE
Director Port Planning and Logistics

cc: Russ Blount, City of Fife
Steve Worthington, City of Fife
Craig Sively, City of Tacoma
Mike Adams, Port of Tacoma
Sarah Armstrong, Port of Tacoma
Dick Gilmur, Port of Tacoma
Jeannie Beckett, Port of Tacoma
Allison Smith, Port of Tacoma
Fred Thompson, Consultant

L06-003

L06-004

L06-005

L06-006

RESPONSE L06-003

WSDOT is coordinating with the Port on the Port's Expansion plans. The Taylor Road/SR 509 intersection is outside the scope of this EIS. The crossing at Alexander Avenue is still required, regardless of vacation of Alexander Avenue north of SR 509 in 2004.

RESPONSE L06-004

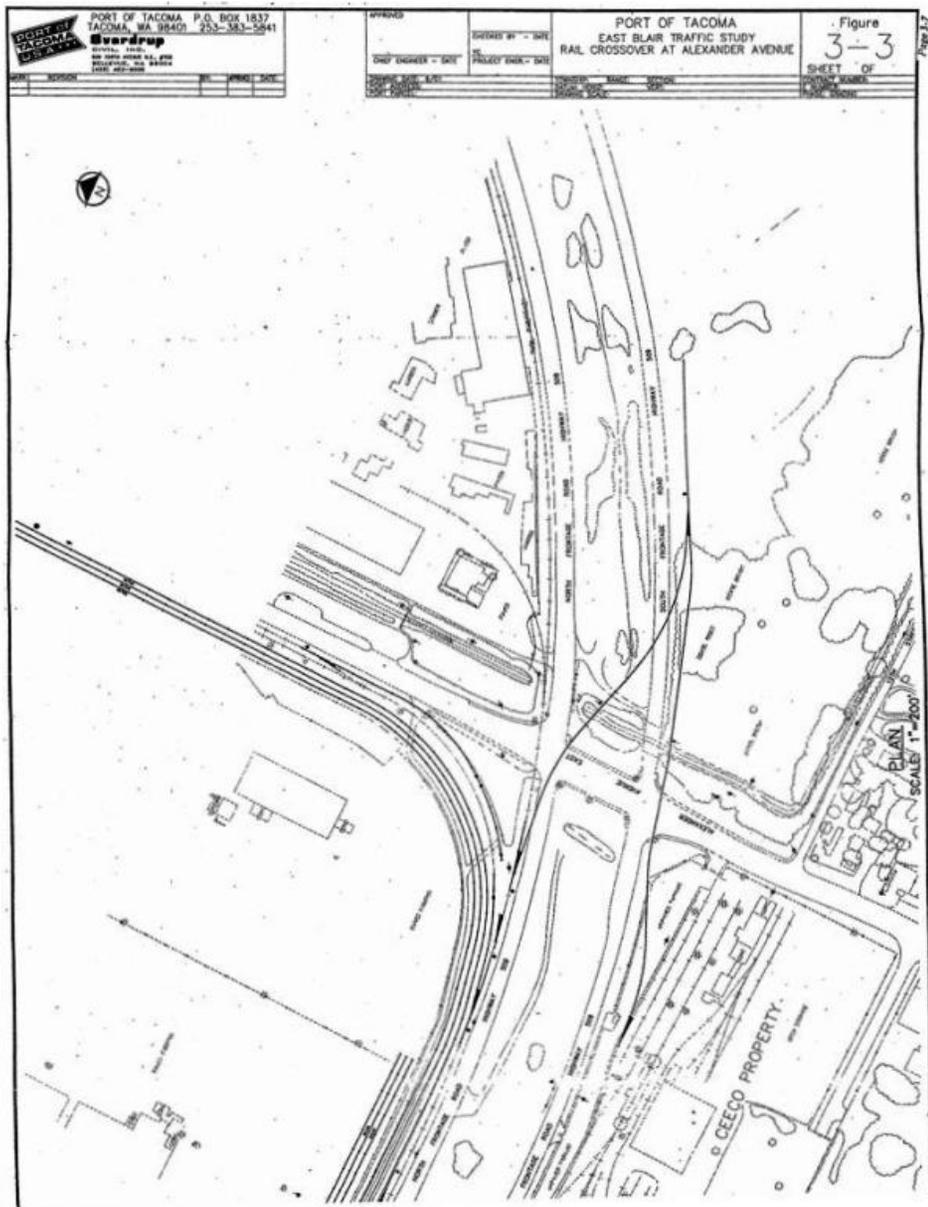
WSDOT and the Port has been working together to develop a rail crossing into the CEECO property. Please also see the "Rail Operations" section in section 3.14 of the FEIS.

RESPONSE L06-005

WSDOT and the Port have been working together to develop roadway plans that consider the current Port Expansion plans, including rail improvements.

RESPONSE L06-006

The Tidelands Traffic Circulation Study has been reviewed as part of revising the FEIS.



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 FEB 17 2004
 TUMWATER DESIGN



February 11, 2004

Steven D. Fuchs P. E.
 Project Engineer
 Washington State Dept. of Transportation
 6639 Capitol Boulevard SW, Suite 302
 Tumwater, WA 98501-5592

RE: SR 167 Puyallup to SR 509
 Tier II DEIS Review

Dear Mr. Fuchs:

This is a revision to the April 28, 2003 letter to Mr. Neil Campbell. We have reviewed the options on the SR 167/54th Avenue East interchange and came to the conclusion that we prefer the Clover Leaf Option instead of the Half Diamond Option.

L06-007

If you have any questions, you can contact me at 253.428.8639.

Sincerely,


 J. Michael Zachary
 Director, Port Planning and Logistics

P.O. Box 1837 • Tacoma, Washington 98401-1837 • Telephone: (253) 383-5841

RESPONSE L06-007

The Loop Option for the 54th Avenue interchange is the environmentally preferred option with the least impact to adjacent properties.

April 14, 2003

Mr. Jeff Sawyer
Regional Environmental and Hydraulic Manager
Post Office Box 47446
Olympia, Washington 98504-78446

RE: SR 167, Puyallup to SR 509 – Tier II Draft Environmental Impact Statement

Dear Mr. Sawyer:

The Puget Sound Regional Council appreciates the opportunity to comment on the Draft Tier II Environmental Impact Statement (DEIS) for SR 167, Puyallup to SR 509 project. The Regional Council has participated in the development and framing of this project for several years and through several environmental and planning steps including the Major Investment Study and the Tier I EIS.

The SR 167, Puyallup to SR 509 project is included as a candidate project in the adopted regional transportation plan, *Destination 2030*. *Destination 2030* is the transportation element of the regional growth, transportation, and economic strategy - VISION 2020. Key elements included in this project such as closing missing links in the regional transportation system, taking steps to complete the HOV system, and making improvements to the nonmotorized network are vital to the successful implementation of *Destination 2030*.

Our response is divided into two parts. First, we offer comments on the DEIS, and second, we provide separate guidance on how the final proposal relates to adopted regional approval and federal funding processes.

Comments on Draft Environmental Impact Statement

Statement of Need. It is stated that this project is needed to improve regional mobility, reduce congestion, improve safety, and maintain or improve air quality. The FEIS should clarify and briefly summarize in one place how the design level decisions addressed in this Tier II phase address and advance these objectives consistent with the corridor level outcome of Tier I.

Relationship and Compatibility with Other Projects and Plans. The FEIS should more specifically report on the relationship and compatibility between the preferred SR 167 design-level improvements and other separate but related projects and plans. For example, the FEIS should include text to: demonstrate flexibility to likely outcomes from newly proposed corridor planning on the rest of SR 167; note that the priority project for the I-405 corridor is the SR 167/I-405 interchange; and explain the potential for an indirect connection to Canyon Road,

RESPONSE L07-001

Purpose and Need were developed in coordination with the Signatory Agency Committee representatives during Concurrence Point 1. Please see section 1.1 of the FEIS.

RESPONSE L07-002

It was decided early on in the EIS process to do a Traffic Analysis of the highway system, not the local roadway system. During final design, a more detailed traffic analysis will be performed for each interchange and the local system.

L07-001

L07-002

whether this project supports the managed lanes concept, and how this project might reduce the need for westbound truck climbing lanes proposed for SR 18.

Cost and Phasing. Estimated cost ranges for the construction of the alternatives should be included in the FEIS along with an anticipated construction schedule.

HOV Lanes. The region's adopted transportation plan *Destination 2030* places high priority on completing missing freeway links and key components of the regional HOV system, both of which are part of the SR 167 project. The HOV lanes associated with this project are planned for, but appear not to be scheduled for construction until a later phase of the project. The FEIS should be clear about what HOV elements are included in the opening year (2015) and what elements are to be completed in later phases and when those later phases are expected to be complete. For example, will the HOV to HOV connections at SR 167 and I-5 be constructed at the same time this interchange is constructed or is this part of a future phase? Also, a discussion of the analysis/reasons for the HOV related decisions should be clearly articulated in the document. While the SR 167 Tier II EIS Traffic Report includes a statement of the HOV lanes not being warranted until 2030, it doesn't elaborate on that statement or explain what warrants were considered.

Air Quality Conformity

The FHWA has indicated that the final preferred alternative, as ultimately constituted with any potential refinements that might arise after your complete review of all comments on the DEIS, must be included in the current conforming long-range transportation plan. Therefore, any improvements that differ from the current general Candidate project description in *Destination 2030* will have to be identified and submitted to the Regional Council for inclusion in the regional air quality conformity analysis and a project description change made to Appendix 9 of *Destination 2030* prior to issuance of the FEIS. The Regional Council's Executive Board is authorized to make such revisions upon concluding that the preferred alternative is consistent with adopted regional policies and that the regional plan, as modified, meets regional air quality conformity requirements.

It is unclear from the project description in the DEIS when the HOV lanes from I-5 to SR 161 will be completed. The project as included in *Destination 2030* has the western portion of the freeway from I-5 to SR 509 built by 2010, and the eastern portion from I-5 to SR 161 – including the HOV lanes - completed by 2020. If the final preferred alternative has different completion dates for either of these sections, a revised project description will need to be submitted for inclusion in the Plan and a new air quality conformity finding will need to be made.

The discussion regarding regional conformity and the Build, No Build scenarios should state only that the project is included in a conforming plan and TIP; the statement that the No Build scenario is not included in a conforming plan and TIP should be removed. As indicated in the paragraph above, however, the details regarding the Build alternative should be verified to ensure that the project as described is indeed included in the conforming plan and TIP.

Nonmotorized. A number of significant regional nonmotorized trails, including the Interurban Trail, Hylebos Creek Trail, Wapato Creek Trail, and Puyallup River Levee Trail, traverse this corridor and should be supported with improved non-motorized connections. The proposal to

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RESPONSE L07-003

Estimated costs and construction timing are described in the FEIS.

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RESPONSE L07-004

The DEIS did not contain a phased construction schedule for this project. HOV lanes are not proposed between SR 509 and I-5. HOV lanes are included in the project between I-5 and the existing freeway terminus of SR 167 in Puyallup. The FEIS has been updated to include more information.

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RESPONSE L07-005

Section 3.5.4 of the FEIS includes a discussion of the Conformity Analysis for the Build alternative. This discussion concludes that the SR 167 Extension project meets the regional conformity requirements.

RESPONSE L07-006

The SR 167 Extension project is a \$2-billion project that will be constructed in stages as funding becomes available. Prior to beginning construction on the final stage (HOV portion of the project) .application for a separate Air Quality Conformity Finding will be submitted to PSRC for approval.

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RESPONSE L07-007

The sentence concerning the No Build Alternative has been removed. Thank you for your comment.

L07-006

RESPONSE L07-008

Section 3.15.6 Mitigating Measures (Pedestrian and Bike Facilities) of the FEIS describes the various measures that would be added to the project that would improve "Connectivity" for non-motorized travel. Impacts to existing bike connections are described in the FEIS. Mitigation will be determined prior to construction of the project.

L07-007

L07-008

elevate the new SR-167 facility provides an opportunity to go beyond mitigating adverse impacts and is an opportunity to establish better non-motorized connections that support future travel patterns.

The non-motorized section lacks sufficient information to determine the details of how existing connections across the proposed SR-167 would be affected by each alternative and how connections would be improved or mitigated. In particular, *Figure 3.15-1 Proposed Non-Motorized Connectivity*, is referenced throughout the non-motorized section but provides little information that illustrates what is described in the text. What does “bike connectivity” in the legend mean? This Figure and /or others should support references to text regarding crossings of the proposed SR-167 facility. The DEIS states “At each segment or intersection, specific mitigations are recommended to accommodate non-motorized travel”. Please describe these measures in detail for each segment or intersection.

In general, there are numerous references throughout the non-motorized section that appear to minimize the character of existing and potential future levels of bicycle and walk activity in this corridor. References such as “Pedestrian users would not likely use this facility given density projections and locations to existing generators.” are not supported. Also, when mitigation measures are discussed they are regularly qualified with references that cast doubt on their actual need. References such as “often would include...”, “where feasible...”, and “as traffic volumes warrant...” should be further defined.

TDM/TSM. The DEIS currently treats TDM and TSM as mitigation. Language in the FEIS should be added to fully include these activities as components of the proposed long-range solution. This discussion is related to the future provision of HOV lanes, which are part of the project package.

Irreversible and Irrecoverable Impacts. The irreversible and irretrievable impacts section of the DEIS is too brief and simply stated. The FEIS would benefit from a more thorough accounting of the elements of the environment documented in other sections of the document that would be lost in the trade-off for realizing the benefits of the project.

Data. The DEIS states that economic data from the 2000 Census was not available for the discipline report. These data are available and should be included in the FEIS. The Land Use and Socio-Economic section of the DEIS contains references to a number of geographies (FAZs, TAZs, and block groups) and it would be helpful to include maps of these various geographies. Please note that the DEIS omits before and after traffic figures for I-5 North of the proposed I-5/167 interchange (see figure 3.14-6).

Regional Planning Comments Not Directly Related to the DEIS

Candidate/Approved process. The following information addresses the steps to be taken to advance the SR 167 project from a Candidate project to an Approved project in *Destination 2030*.

Background. In May 2001, the Puget Sound Regional Council adopted a new regional transportation plan – *Destination 2030*. This plan included guidance for capacity investments that categorized all regionally significant improvements as either Candidate or Approved (please

RESPONSE L07-009

The project corridor is a limited access facility, and although the facility will allow non-motorized users, with noted exceptions, it is common that high speed, high volume limited access highways coupled with the presents of commercial and industrial sites do not present demands consistent with further accommodations beyond normal accessibility.

L07-008

RESPONSE L07-010

Section 3.14 of the FEIS is updated to include more information.

RESPONSE L07-011

Section 3.19 Irreversible and Irrecoverable Commitment of Resources is intended to be a brief summary discussion.. A more thorough evaluation is contained in the impacts and mitigation measures sections for each environmental topic.

L07-009

L07-010

RESPONSE L07-012

Section 3.11 of the FEIS has been updated to reflect the 2000 Census data.

L07-011

RESPONSE L07-013

The figures (maps) have been modified to depict the geographic areas (FAZs, TAZs and block groups) and incorporate changes based on the 2000 Census.

L07-012

L07-013

L07-014

RESPONSE L07-014

Figure 3.14-6a has been updated to include traffic forecast volumes of I-5 north of the proposed I-5/SR 167 interchange.

L07-015