

Response

Comment A-1

A-1. Department of the Army
Comments

1. Comment noted.



DEPARTMENT OF THE ARMY
SEATTLE DISTRICT CORPS OF ENGINEERS
EASTERN WASHINGTON REGULATORY OFFICE
POST OFFICE BOX 273
CHATTAROY, WASHINGTON 99003
October 10, 1995

REPLY TO
ATTENTION OF

Regulatory Branch

Mr. J. C. Lenzi
Washington State Department of Transportation
2714 North Mayfair Street
Spokane, Washington 99207-2090

Reference: North Spokane Freeway
Draft Environmental Impact Statement

Dear Mr. Lenzi:

This is in regards to the Draft Environmental Impact Statement (DEIS) dated September 1995 for the North Spokane Freeway in Spokane County, Washington. Section 404 of the Clean Water Act (33 U.S.C. 1344) requires the issuance of a Department of the Army permit prior to excavation from or the discharge of dredged or fill material into waters of the United States, including wetlands.

From the information provided in the DEIS, it appears that the Market/Green and Havana alternatives are the only alternatives that have the potential for requiring a Department of the Army permit. This would be associated with the crossings of the Spokane River and adjacent wetlands. The final design of the project will be required prior to our decision as to the level of permitting required: nationwide permit or standard permit.

If you have any questions regarding our comments or requirements for permit applications, please contact me at the above address or by phone at (509) 238-4570.

Sincerely,

Tim R. Erkel
Biologist, Eastern Washington Office

Response

Comment A-2

A-2 City of Spokane Planning and Engineering Services Comments

1. At this time, PM-10 and ozone are only modeled at the regional level. Inclusion of the project in the Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP) ensures that it is included in the regional model for these pollutants. Both the MTP and TIP conform with the State Implementation Plan for achieving the air quality standards for ozone and PM-10.

2. The sound wall mitigation results in building walls that satisfied criteria for a reasonable (7dBA) reduction in noise and at a reasonable cost. WSDOT is committed to constructing those walls and also those walls found to be feasible at an excellent cost. A commitment is made by WSDOT to meet with neighborhood representatives and city and county planners during design and right of way acquisition phases to discuss impacts and possible mitigative effort beyond that required by noise abatement criteria.

3. The project will comply with Best Management Practices (BMP's). See pages 4-52 to 4-97 of the FEIS.

4. Washington State Office of Financial Management (OFM) population projections

OCT 12 1995

Mr. Harold L. White, P.E.
Washington State Department of Transportation
2714 North Mayfair Street
Spokane, WA 99207-2090

PLANNING AND ENGINEERING SERVICES
606 W. SPokane FALLS BLVD.
Spokane, WASHINGTON 99201-3334
(509) 625-4220
DESIGN SERVICES DIVISION
FAX (509) 625-4220

OCT 18 1995
SPOKANE, WA 99207

The City of Spokane submits the following comments regarding the Draft Environmental Impact Statement for the North Spokane Freeway, NSF.

Both the Mayor and the City Plan Commission adopted resolutions supporting the Market/Greene corridor as a preferred choice in 1991. The Hillyard and Chief Gary Park Neighborhoods, as well as the City's Comprehensive Plan, also support the choice. Since 1991 no substantive changes in the plans have caused a change to the preference in the Market/Greene corridor.

Following are comments of a more technical and specific nature submitted for the purpose of justifying the position and clarifying the Draft EIS document.

1. Pg. 4-1 - AIR QUALITY - STUDIES & COORDINATION
Ecology uses a model to demonstrate compliance for PM-10. This model can also be used to estimate impacts of PM-10 using VMT and the constant PM-10 generated per VMT at a given speed.
The ozone measured at the Greenacres monitoring site is .09, the standard is .12. Will the additional vehicles increase this or cause a violation? This should be addressed. 1
2. Pg. 4-28 - IMPACT REMAINING AFTER PROPOSED MITIGATION
The remaining 40-80 noise impacts remaining after mitigation seem high. Additional efforts should be performed so that further reduction could take place, especially within residential neighborhoods. 2
3. Pg 4-85 - MITIGATION
The NSF is located over Spokane's sole source aquifer. Stormwater discharges must utilize BMPs ie. swales, oil/water separators etc. prior to discharging to the river or ground. 3
4. Pg. 4-134-Table 4-28 - POPULATION COMPARISON OF IMPACTED CENSUS TRACTS
Growth should cite the source and/or methods used to derive the 4

provided the base aggregate data from which allocations to specific Census Tracts were made. Spokane Regional Transportation Council population, housing, and employment data for existing conditions and projections to 2010 and 2020 were used to evaluate growth patterns.

Response

Comment A-2 (Continued)

5. This statement is based on the Service Discipline Report. Concluding from that report, building the NSF will not substantially affect access to schools, religious institutions, medical services, transit, and emergency services. The subsection on Circuitry of Access points out the most common issue to be additional travel time required by rerouting to alternate streets to reach areas where a non-arterial street may be closed.

6. The model analyzed specific receptor sites listed in table 4-2, p 4-4 of the FEIS. The receptor CO concentrations for each site are listed in table 4-5, p 4-9 and 4-5a, p 4-10 of the FEIS. Air Quality Impacts below the National Ambient Air Quality Standards are not required to be mitigated. Only impacts higher than the national standards will be addressed.

7. Comment noted.

8. The transportation discipline report states that impacts in volume for traffic oriented to US 2 and US 395 is not expected to vary significantly between options. The level of service on US 2 and at the Division "Y" would be lower with the south options than the north option due to the number and spacing of signalized intersections. The north option will make US 395 more attractive for trips from the NSF to destinations north of the Division "Y."

Mr. Harold L. White	Page 2	October 1995	
populations for 2000 and 2020. Spokane City/County GMA documents may be excellent references.			4
5. Pg. 4-144 - <u>2ND SENTENCE UNDER COMMUNITY COHESION</u>			
"Streets that are closed should not isolate areas, . . ." If this is the case there needs to be an expansion to help document this position. Citation of references may be useful support.			5
6. Pg. 4-147- <u>COMMON TO ALL ALTERNATIVES AND RECREATIONAL PROPERTIES</u>			
The model shows minor increases of CO. Should expand by identifying locations of these increases. A discussion of impacts should also take place to further define the statement that "the 4(f) resources will not be substantially impaired." reviewing Chapter 6 in Volume 2, identifies physical constraints and required mitigation but does not detail the air impacts.			6
7. The South Option will impact the traffic signal operations on Newport Highway and Hawthorne Road, on Nevada Street and Hawthorne Road more than the North Option.			7
8. Both options will impact turning patterns at the Division "Y." Southbound traffic from SR 395 to north Division will travel the freeway to the SR 2 interchange and then use the Newport Highway rather than exiting and using Division north of the "Y." The impacts of the changes in volumes and turning patterns on the Division "Y" should be analyzed. The North Option should reduce this diversion.			8
9. Prefer the North Option because of the impacts listed in 7 and 8 above.			9
10. The State Route System after this improvement is unclear. Will Francis between Division and the North Spokane Freeway be designated a State Route? Will Division and Newport Highway between the North Spokane Freeway and SR 90 be removed from the State Route System? The answer to this question will have a large impact to the City of Spokane's maintenance responsibilities.			10
11. Prefer the Market/Greene Alternate because of its proximity to the City's arterial network. The proposed interchange with Trent Avenue on the Market/Greene Alternate will make Trent an attractive access route to the Central Business District and the Riverpoint Higher Education campus as opposed to using SR 90.			11

9. Comment noted.

this time.

10. Revisions to State Highway route designations are defined in RCW 47.04, Classification of Highways and RCW 47.17 State Highway Routes. No determination can be made at

11. Comment noted.

Response

Comment A-2 (Continued)

12. Additional lanes would be added between Market Street and the NSF with a new grade separation of the BNRR line and Wellesley Avenue. Minor improvements may be required between the NSF and Freya Street.

13. This type of revision will be accommodated during the development of limited access plans.

14. The intersection of Freya Street with Trent Avenue will require modifications for signalization and channelization. No other improvements are planned.

15. Capacity improvements to Thor/Freya require the closure of the slip ramps at Altamont Street as stated in the EIS, Four Lakes to Idaho State Line. Traffic bound for I-90 on Altamont and Freya will be required to use a more circuitous route affecting segments of city arterials. Rerouting of traffic from the closure of Altamont Ramps will increase local traffic on 5th Avenue from Liberty Park to Freya. Loss of access to I-90 from Freya Street will reduce traffic volumes on Freya as compared to the no-build alternative.

The city of Spokane Arterial Street Plan (Revised February 1988) lists Altamont as a Minor Arterial and Freya as a Neighborhood collector Arterial.

Mr. Harold L. White

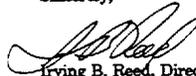
Page 3

October 1995

12. Please define the improvements on Wellesley Avenue between Market Street and Freya Street required by this project. 12
13. The City's Arterial Street Plan proposes developing the Broadway-Springfield arterial between Freya Street and Trent Avenue. The design of the Market/Greene Alternative makes the southbound off-ramp/on-ramp the logical terminus of this future arterial. The design of the Market/Greene mainline should provide a design envelope underneath the structure to allow construction of this arterial including provision for a bridge over the railroad mainline. 13
14. Please define the improvements on Freya Street between Trent Avenue and Freya Street required by this project. 14
15. The proposal will not provide access from either Altamont Street or from Freya Street to either the SR 90 mainline or the CD roadway system. The lack of direct access will make these facilities function more like neighborhood collectors. Traffic volume on Thor-Ray will be increased. Please identify the traffic impacts on this corridor. 15
16. Second and Third Avenues currently fill a collector role to the adjacent neighborhoods. The elimination of these roadways will require Sprague Avenue and Fifth Avenue to fulfill this distribution role. Please identify the impacts of this change. 16

The City appreciates the opportunity to comment on such a significant project.

Sincerely,


Irving B. Reed, Director
Planning & Engineering Services

IBR:jlf

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It is not expected that these arterial designations would change as a result of this project.

16. The traffic currently using Second and Third Avenue will be split between the C/D and Fifth and Sprague Avenue. The traffic model used is unable to differentiate traffic splits on parallel roadways located with spacing this close together. The number of trips generated by

the neighborhood will drop with the removal of housing for highway construction, unless the area is renovated to higher housing densities.

Response

Comment A-3

A-3 Department of Ecology Comments

1. The north option has been selected as the preferred alternative. Comment noted.

2. Comment noted.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

October 25, 1995

Mr. Gene Fong
Division Administrator
Federal Highway Administration
711 South Capitol Way, Suite 501
Olympia WA 98501

Dear Mr. Fong:

Thank you for the opportunity to comment on the draft environmental impact statement for the North Spokane Freeway, which includes options to provide a four- to eight-lane fully controlled access highway between I-90 on the south terminus and US-2/US-395 on the north terminus in Spokane County. We reviewed the draft EIS and have the following comments.

1. Regarding the North Market Street (Superfund) Site: As provided in previous comments on the proposed routes, the northern and easternmost route of the "North Option" will have the least impact on the remedial designs under development for ground water cleanup, and is preferred from a cleanup standpoint.
2. Per the requirements of the merger agreement, Ecology has no objection with the purpose and need as stated in the project. If a 401 water quality certification is needed, please contact Ms. Sandi Manning at (360) 407-6912 to apply.

If you have any questions on comment 1, please call Mr. John Roland with our Toxics Cleanup Program at (509) 625-5182. For questions on comment 2, please call Ms. Sandi Manning with our Central Programs at (360) 407-6912.

Sincerely,

Elizabeth J. Phinney
Environmental Review

EJP:
95-6782

cc: Jerry C. Lenzi, WA Dept of Transportation
Sandi Manning, Central Programs
John Roland, ERO

RECEIVED
OCT 31 1995
HAROLD WHITE, P.E.

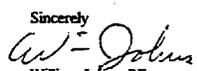
Response

Comment A-4

A-4 Spokane County Division of Engineering and Roads Comments

1 The 1990 Washington State Legislature funded this study through the completion of the Environmental Impact Statement. The WSDOT is subject to follow the direction of the Legislature and as required will complete this study. The Legislature has the approving authority for any future state funding of this project or other transportation projects by WSDOT.

This study is consistent with current regional planning to meet specific transportation and growth needs. Additional study is required to address all regional transportation and growth related needs. As expected, other improvements will be developed to address additional transportation deficiencies. Competition for funding these improvements is and will remain high..

 S P O K A N E COUNTY	RECEIVED DEPARTMENT OF TRANSPORTATION OCT 30 1995 NOV 14 1995
DIVISION OF ENGINEERING AND ROADS William A. Johns, P.E., Acting County Engineer	A DIVISION OF THE PUBLIC WORKS DEPARTMENT Dennis M. Scott, P.E., Director
<p>Washington State Department of Transportation C/O Harold L. White, PE 2714 North Mayfair Street Spokane, Washington 99207-2090</p> <p style="text-align: center;">RE: NORTH SPOKANE FREEWAY DEIS October 27, 1995</p> <p>Dear Mr White,</p> <p>I would like to first of all say that I believe this to be a well done document from a professional and technical basis. We now have an accurate document from which can be made sound decisions. My basic comment is that this facility has become so expensive both in impacts and in cost which then makes it unbuildable. The problem with continuing to believe that it can be built is that it overwhelms alternate strategies. The dream of constructing this facility has been with us since 1946 and perhaps in the 50s or 60s it could have been built. The problem is it is 1995 and the Chance for actual construction has passed.</p> <p>My overall recommendation is to drop the North Spokane Freeway from further consideration and eliminate it from all plans. This approach will allow the thinking and planning necessary to develop projects and strategies that can go forward to solve the problems documented in the DEIS.</p> <p style="text-align: center;">Sincerely  William Johns, PE Acting Spokane County Engineer</p> <p style="font-size: x-small; text-align: center;">1226 W. Broadway Ave. • Spokane, WA 99260-0170 • (509) 456-3600 FAX: (509) 324-3476 TDD: (509) 324-3146</p>	

Response

Comment A-5

A-5 United States
Department of the Interior
Comments

1. Comment noted.

2. Impacts caused by the improvement planned for Interstate 90 are listed separately as they are common to both alternatives. The selection of a build alternative will cause direct impact to "Your Place Park" as discussed in the Final Section 4(f) Evaluation. Wild Horse Playground/J.J. Hill Park are in the study area. No detrimental impacts were identified and the Final Section 4(f) Evaluation has been updated to include documentation.

3. No detrimental impacts were identified for the sites listed and the Final Section 4(f) Evaluation has been updated to include documentation.

4. Additional coordination has taken place with the Spokane Parks and Recreation Department. Their comment letter is included with the FEIS. Chapter 6 has been revised.



ER-95/684

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240



NOV 22 1995

Mr. Gene Fong
Division Administrator
Federal Highway Administration
711 South Capitol Way, Suite 501
Olympia, Washington 98501

Dear Mr. Fong:

This is in response to the request for the Department of the Interior's comments on the Draft Environmental/Section 4(f) Evaluation for Improvements to the North Spokane Freeway (Between I-90 and US 2/US-395), Spokane County, Washington.

We concur that there is no feasible and prudent alternative to the use of some Section 4(f) resources for the proposed freeway project. However, we do not believe that all possible planning has been done to minimize harm to Section 4(f) resources.

Alternatives

We are in sympathy with the concerns voiced by the Spokane Parks and Recreation Department about the adverse impacts of the proposed Havana Alternative on parks and recreation resources, particularly the Minnehaha Park and the Esmeralda Golf Course. We also note that the Mayor of Spokane, in his letter of July 6, 1991, to the Washington Department of Transportation, strongly encouraged that serious consideration be given to the Market/Greene (MG) Corridor in recognition of the City's Comprehensive Plan.

We believe a carefully modified MG Alternative will have lesser impacts on park and recreation resources. The Section 4(f) Evaluation incorrectly states that the MG Alternative will have no impacts to Section 4(f) properties. This alternative will have impacts on "Your Place Park" through the construction of the I-90 Collector Distributor which appears to be a necessary part of all MG Alternatives, and the Wild Horse Playground/J.J. Hill Park. Additionally, we note that the Study of Route Alternatives (Appendix C, page C-15) indicates that the MG Alternative will impact the Continental and Tuffy's Trails, 17.3 acres of school recreational area, Harnos Park (10.3 acres), Hillyard Swimming Pool, and two proposed parks comprised of one proposed museum and a proposed open space area under the Hillyard Neighborhood Plan. These impacts should be addressed in the Final Section 4(f) Evaluation.

Mitigation Measures

We do not believe that all possible planning has been done to minimize harm to park and recreation resources, in compliance with the second proviso of Section 4(f). Measures to mitigate impacts to all the above Section 4(f) resources should be addressed in the Final Section 4(f) Evaluation. They should also be coordinated with and approved by the Spokane Parks and Recreation Department, and evidence to that effect should be documented in the Final Section 4(f) Evaluation.

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2
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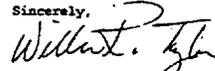
Summary Comments

2

The Department of the Interior has no objection to Section 4(f) approval of this project by the Department of Transportation, providing a modified MG Alternative with least impacts to Section 4(f) resources is selected as the Preferred Alternative, and all mitigation measures to Section 4(f) resources are coordinated with and approved by the Spokane Parks and Recreation Department.

We appreciate the opportunity to provide these comments.

Sincerely,



Willie R. Taylor
Office of Environmental
Policy and Compliance

cc: Mr. Jerry C. Lensi, P.E.
Region Administrator
Department of Transportation
Eastern Region
2714 North Mayfair Street
Spokane, Washington 99207-2090

Ms. Judy Quinlivan
Co-Director
Spokane Parks and Recreation Department
City Hall, 7th Floor
808 West Spokane Falls Boulevard
Spokane, Washington 99201-3317

Response

A-6 United States
Environmental Protection
Agency

1. Comments noted.
2. The number of affected housing units does not directly indicate a conflict with Executive Order 12898. Both the Havana and Market/Green Alternative pass through the same neighborhoods. The Havana route would displace approximately 213 to 230 housing units and the Market/Green route displaces approximately 180 to 200 housing units. Additional information on the effects of this project as related to Executive Order 12898 have been included in the FEIS.

Comment A-6

	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10 1200 Sixth Avenue Seattle, Washington 98101	JAN 22 1996 HAROLD WHITE, P.E.
Reply To Attn Of: WD-126	JAN 16 1996	RECEIVED DEPARTMENT OF TRANSPORTATION JAN 22 1996 SPOKANE, WA 99207
Harold White P.E. Project Engineer Washington State Department of Transportation 2714 N. Mayfair Street Spokane, Washington 99207-2090		
Dear Mr. White:		
The Environmental Protection Agency (EPA) has reviewed the North Spokane Freeway Draft Environmental Impact Statement (EIS). Our review was conducted under the National Environmental Policy Act and Section 309 of the Clean Air Act, which directs EPA to review and comment on all federal EISs.		
Following our review, EPA has found no significant statutory or jurisdictional issues of concern from its perspective. Therefore, we are rating this draft EIS LO (Lack of Objections). An explanation of the EPA rating system is enclosed for your reference. This rating will be published in the <u>Federal Register</u> .		
EPA prefers the Havana alternative to the Market/Green alternative because Havana option seems to pass through less residential areas. It is, therefore, less likely to be in conflict with Environmental Justice Executive Order 12898, which requires lead federal agencies to carefully assess impacts to minority populations and low-income populations.		
We have communicated with the Spokane County Aquifer Protection Office on the issue of Sole Source Aquifer impacts and we will soon be issuing a statement regarding Section 1424(e) of the Safe Drinking Water Act.		
Given that this project is proposed for a highly urbanized area, we feel that its additional risk to nearby surface water		

Response

Comment A-6 (Continued)

bodies is minimal.

Thank you for the opportunity to review this draft EIS. If you have any questions regarding our review, please contact me at (206) 553-1984.

Sincerely,


John Bregar
Office of Ecosystems and Communities