

## Response

## Comment C-31 (Continued)

15. The clover leaf interchange provides for free flow movements of traffic. This was found to be desirable in limiting air pollution from automobiles. Other configurations of free flow interchanges require more land and are more costly.

16. To accommodate this movement the use of Center Road back to Farwell Road or turn around at the Camelot Subdivision would be require. A more direct solution is to construct an exit ramp to Farwell Road between the Interchange and the Park and Ride lot. This ramp would then serve both. This will be considered during the development of the limited access plans.

change. One wonders just how many commuters are apt to use this facility, given that there is no southbound access to or northbound exit from the freeway provided.

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6. The Newport Highway - Freeway Cloverleaf Interchange. My first reaction when I saw the proposal for a traditional cloverleaf interchange at the freeway - Newport Hwy. intercept (North Option) was one of incredulity. I happen to have a long-standing hatred of cloverleaves. This past summer I had occasion to drive through several such cloverleaves - at Kennewick and in the St. Paul, Minnesota area - and each experience was white-knuckle. To turn left, one must first quickly weave through entering traffic to get to the "leaf". The "leaf" will invariably be tight radius, slow speed. Then one is dumped out onto the second highway, where again it is necessary to weave quickly - in a few hundred feet - through exiting traffic in order to gain a travel lane on the second highway.

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In a recent conversation with Mr. Mike Brower of the Federal Highway Administration, I have learned that, while the cloverleaf design is still currently permitted on federally-assisted projects, the innate problems described above would have the cloverleaf application to new freeways discouraged. If traffic volumes are not high enough to merit the desirable multi-bridge solution employed, for example, where I-90 intersects I-405 east of Seattle, current thought would then apparently prefer the signalized diamond solution, with the signals being installed on the lower-speed entity (i.e., Newport Highway in this instance).

But aside from the inherent questions about the cloverleaf design on a modern freeway, the present proposed design borders on the absurd. Let us suppose that a vehicle is coming from downtown Spokane and wishes to travel to an event at Northwood Junior High (or Mead High School or the Wandermere Mall, etc.). How can this vehicle get there from the northbound freeway? Surely the driver would not expect to be forced to exit miles away from her destination at the Francis Ave. exit (or even the Market Street exit, if built). As currently planned, there is to be no northbound exit at Division, either, so travel miles beyond her destination to the Hatch Road exit would be totally out of reasonable expectation. No, our driver would most likely exit at the Newport Highway interchange to northbound Newport Highway. But now she is trapped! The off-ramp will deposit her in fast traffic speeding away from her destination! What should she do? Make a U-turn on Newport Highway? Absurd! Is there some other southbound route which will return her from northbound Newport Highway to the Farwell/Hastings Road thoroughfare? The answer is no, as currently planned her selection of the northbound freeway off-ramp is simply a mistake.

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Can Hastings/Farwell be accessed for northbound freeway traffic? Yes, if one is willing to play a stupid game: One must weave through traffic entering the freeway to the southbound Newport Highway cloverleaf. After negotiating the tight radius, one approaches southbound Newport Highway, but instead must immediately select the southbound freeway cloverleaf. After going around the second tight radius, one must then immediately select the northbound Newport Highway cloverleaf. Presumably one could then weave through traffic heading to the northbound freeway, dash across several northbound lanes on the Newport Highway in time to gain the left turn lane leading to westbound Farwell road. Three cloverleaves! Wow!

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17. The intersection of two limited access highway US 2 and the NSF are usually developed to a higher standard than those of non-limited access. A diamond interchange may be able to serve the traffic for a limited duration. This also will be considered during the development of the limited access plans.

18. This proposal has been presented to the various emergency service agencies for review and comment. No concerns have been raised over the lack of access to the NSF. The reduction in congestion on other streets brought by this facility improves overall response time.

The Fire District 9 station on Hastings Road was not on line at the time this report was prepared. The FEIS has been updated. Prior to this station being placed in service Fire District 9 was aware that access from this station to US 2 will be along Hastings/Farwell Road.

Incidentally, a similar analysis suggests that the STA busses are going to have similar fun servicing the Park and Ride lot shown on the page D-27 plan.

To me, this proposal is ridiculous. Let's abandon the cloverleaf in favor of the traditional diamond design. Not only would this save several proposed (expensive) bridge structures and some homes and businesses, but in its simplicity would also permit all needed traffic maneuvers. (I am assuming that the yet more desirable multi-bridge interchange will continue to be precluded because of the high costs.)

Is there a significant advantage to the cloverleaf as compared to the diamond interchange? I have been told that the weaving maneuvers at the bridge in the traditional cloverleaf will predictably produce a large number of side-swipe and fender-bender accidents, but generally not many serious injury accidents. (The traffic tie-ups attending such accidents are apparently not worth considering!) Conversely, the diamond design can produce serious-injury accidents when one vehicle runs a red light and collides at higher speed in a side-impact accident. Incidentally, when we remember that the negative response to my earlier advocacy for full interchanges at both Division and the Newport Highway was stated to be the "less than necessary distance" between entrance and exit ramps (one mile supposedly), one wonders how a cloverleaf, with at best a few hundred yards for similar maneuvers, can possibly be defended.

Presumably we must consider the Spokane drivers' penchant for running red lights, and thereby limit ourselves to the designing of freeway interchanges which are awkward or even bordering on the unworkable!

7. Emergency Vehicle Response. In my opinion, the emergency services treatment in the DEIS is done poorly. The discussion suffers because of errors in the text, but additionally seems to be unresponsive to the undeniable desirability of speedy response for fire, medical, and police vehicles.

The DEIS has incorporated significantly incorrect information about Fire District #9. For one thing, District 9 is not an all-volunteer operation. Crews man the stations at Hastings Rd. near the Mead High School (Fairwood), at Farwell near Market St. (Mead), and on Orchard (Peone) Prairie around the clock. The Hawthorne Rd. - Division St. installation mentioned in the DEIS is no longer used for emergencies. District 9 also has a number of volunteer stations strategically located within its 110 square miles of territory. Additionally, District 9 has entered into cooperative mutual aid agreements with the City of Spokane and all other rural fire districts within Spokane County. As a result of these agreements, men and equipment may be summoned to structure, forest, and range fires county-wide. Likewise, District 9 emergency medical teams may respond to accidents, injuries, and other emergencies over most of the county. These agreements are vital. One only needs to remember that over 100 homes were destroyed in a devastating group of fire storms in 1992.

Law enforcement throughout the unincorporated portions of Spokane County is assigned to the sheriff. The principal location for the sheriff's operations - including the garaging and dispatch of sheriff vehicles - is from the County Courthouse area just north of downtown Spokane.

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19. Chapter 1 of the DEIS, Purpose and Need for this Action, includes a multi-discipline needs statement that is the basis for this study.

It is not the intent of this study to propose that a single facility or plan would relieve all congestion in North Spokane County. The 1985 Transportation Plan Update published by Spokane Regional Council addressed needs for a new freeway and additional capacity improvements such as a Beltway/Bypass. To include proposals that address all regional transportation deficiencies is outside the scope of this study.

20. A majority of trips on the NSF begin and end within Spokane County. Chapter 1 contains a discussion of Transportation Demand and Capacity. Table 1-2 of the FEIS lists a comparison of PM peak trip types.

Additional data is available in the Traffic Analysis Summary and Results Discipline Report and the Transportation Discipline Report which are available for review by request.

This lengthy preamble is included here to emphasize the necessity for our law-enforcement and emergency response vehicles to have adequate access to - and egress from - the North Spokane Freeway. To me it is preposterous to contemplate a vital freeway where obvious access points are not available to such vehicles.

For example, suppose the South Option is constructed as now proposed. A major fire in the Bigelow Gulch area would see the first response from the station on Orchard (Peone) prairie near Argonne Rd., with subsequent response from the Mead and Fairwood (Hastings Rd.) stations. The Mead vehicles would travel south on Market, after about two miles passing under the inaccessible freeway. After two plus more miles on congested Market St., the vehicles would then travel east on Francis, travelling under the freeway once again, thence to the fire scene without any assistance or time saving because of the freeway.

Note that response from the headquarters Fairwood station would also suffer. In less than one-half mile responding vehicles would pass under the freeway, but with no southbound access available would be forced to travel east on busy Hastings/Farwell Rd. to the Newport Hwy., then after travelling south and west (!) obtain access to the freeway at the Newport Hwy. interchange, thence at high speed to the Francis off-ramp and the emergency scene.

Vehicles returning from this emergency would face a similar impossibility in exiting the freeway at the most logical (closest) point. Similarly, non-District 9 vehicles responding to a mutual aid call at, for example, the Mead High School would necessarily leave the freeway prematurely, thereupon to travel over miles of surface streets. In the North Option, such vehicles would not have direct access to Hastings/Farwell upon leaving the freeway at the Newport Highway interchange, and would either make a fast U-turn on the Newport Highway or would do the spectacular three cloverleaf loops as described above.

The conclusion is unescapable: the DEIS has not adequately addressed the necessary and/or desirable features for emergency-response vehicles in Spokane County.

8. The Missing Data Required for the Defense of the Proposed Project. The DEIS does a very poor job of defending the need for the project insofar as alleviating local problems. It is stated on p. 1-1 and was further emphasized by a DOT official at the September 25 hearing that the major incentive for Federal financial participation in the funding for the freeway is to facilitate the connection of I-90 and North-eastern Washington State and Southeastern British Columbia. If this is truly the case, one wonders if the project can be defended at all, given the tremendous financial cost and inevitable social and environmental impacts. After all, traffic from these distant areas could easily and desirably be diverted from U.S. 2 and U.S. 395 without ever encroaching on Spokane area highways. Southbound U.S. 2 traffic could be diverted at the Newport/Oldtown junction with Idaho 41. This Idaho highway could be brought up to class one standards all the way from Oldtown to I-90 at a fraction of the cost and impact of the North Spokane Freeway.

A similar proposal could be advanced for the improvement of Washington #231. Again, this rural highway forms a direct north-south route between Chewelah and U.S. 2 west of Airway Heights, and from there

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21. See Beltway/Bypass section of FEIS.

directly south to I-90. This sparsely-travelled route could be easily widened and otherwise improved without excessive costs and impacts.

Improvement of these two highways would also have the advantage of funneling long distance traffic away from the North Spokane area, where its presence would exacerbate the problems already being produced by Spokane County traffic (i.e., noise, carbon monoxide, etc.). Emphatically, I can see absolutely no rationale for the notion of bringing traffic from distant places through the urban areas. If these travellers wish to shop or spend the night in Spokane, they will be welcome. If, on the other hand, they are just passing through, we should be doing everything possible to keep them out. Again, I will assert that the only defense for the North Spokane Freeway project is the alleviation of congestion caused by suburban vehicles in northern Spokane County travelling to and from destinations in Spokane's urban core.

Surely traffic studies must have been done and impact predictions of future housing developments must have been completed, leading to conclusions concerning the origin and destination of vehicles which are expected to utilize the North Spokane Freeway. Because these data are not included in the DEIS, one cannot comment on their relationship to the current freeway proposal, as, for instance, whether the lack of full interchanges at Market and Division Sts. is congruent with the number of trips presumably originating in those vicinities and supposedly having access to and impact on the freeway.

Certainly if a compelling reason for the construction of this facility is to be the service of traffic originating more than fifty miles from the Spokane city center, then one would expect that a significant number of such daily trips would have been predicted. Without any data, I would be personally surprised if such trips would account for even 10% of the total. If such a low percentage would prove to be the case, then the defense of the freeway given in the DEIS fails utterly.

9. The Bypass. Significant citizen comment at the Sept. 25 hearing seemed to favor a circular high-speed route in the far suburbs of Spokane. Supposedly such a plan would obviate the necessity of a major freeway penetrating the north urban city in order to give access to the city core.

After studying the topographic maps of this area, I have personal doubts as to whether a circular 'beltline' could be built without encountering tremendous costs associated with difficult terrain, river crossings, and the avoidance of historic and registered natural areas. Further, it is unlikely that such a route would serve the needs of those numerous north Spokane residents who require access to their employment in the city core, and who thereby are even currently clogging the major north-south arterials. Nevertheless, because the DEIS has chosen to discuss other improbable options (e.g., the Maple-Ash corridor, etc.), it would appear that the failure to at least address the 'beltway' idea is yet another significant omission in the DEIS.

10. Associated Impacts. One additional arena which the DEIS has ignored deals with the inevitable impact of the freeway's construction on existing surface arterials. This effect will be even more pronounced locally if the number of available interchanges is minimized, thereby causing drivers to travel farther in order to gain access to

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22. The NSF will significantly change traffic flow east of Division Street and west of Argonne/Bruce Road. This change in traffic flow both increases and decreases traffic volumes on various City, County and State roadways. Reductions in traffic volume are found on north/south arterials within this area while increases are located on selected east west arterials. Arterials with interchanges such as SR 290 (Trent Avenue), Wellesley Avenue and Francis Avenue are most significantly impacted. Table 1.5 of the FEIS lists where existing capacity problems occur and are projected to occur in 2010 and 2020 under build and no build conditions. In a majority of locations the Volume to Capacity Ratio (V/C) is reduced with the build options indicating an improvement. Cost for mitigating direct impacts to these roads is included in the estimates for the alternative and will be constructed with the NSF as required.

23. Under Public and Agency Coordination in the Summary outside agency involvement is detailed. Both the City and County have had the opportunity to review and comment on the DEIS. Both agencies have

the freeway.

An additional question which is not well-addressed in the DEIS concerns rush hour traffic, particularly in regard to the adequacy of the surface streets to handle the traffic coming off of the freeway. Simply assuming that the traffic load will be transferred to I-90 begs the question: the problem then is simply transferred to the I-90 off-ramps and associated (inadequate?) feeder arterials.

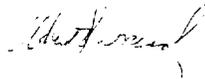
Numerous questions arise from this situation:

- What dollar cost will be involved in the widening, signaling, etc., of existing surface streets and arterials in order adequately to facilitate travel to and from the freeway?
- What will be required in the condemnation of homes and businesses in order to accommodate these arterial improvements?
- Will State and Federal funds be made available for this new construction, thereby alleviating the perennial strain on city and county road budgets?
- Can these needed improvements be accomplished at the time of the freeway's construction, or will the city and county be forced to band-aid the worst problems as funds trickle in over a many-year period?
- What procedures have been and will be put into effect to guarantee that city and county land and road planners have adequate input into the planning for the freeway and affected surface arterials? (Judging from the letters reproduced in the DEIS as well as comments from various officials, it would appear that city and county planners have been placed in the unfortunate position of having to react to previously-unseen DOT proposals, rather than being included in the planning leading up to those proposals.)

**Conclusion.** Other issues remain which I will not detail here. Such things as subsidiary parallel access roads, the updating of the data to reflect current conditions (e.g., the new HICO complex at the Nevada-Newport Hwy. intersection, the Wal-mart store recently proposed for a location just north of the Border Patrol building, and the extensive residential-commercial proposals for currently-vacant land north of Hastings Road), as well as the correction of obvious errors in the DEIS (e.g., the main titles on p. 2-59) will need to be addressed.

Given the problems and omissions discussed above, I would suggest that a revised draft environmental impact statement must be prepared. Surely this present draft is inadequate to use as a basis for the preparation of a final Environmental Impact Statement.

Most sincerely,



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submitted comment letters.  
24. All decisions are based on information in the FEIS. The public hearing/comment process on the DEIS is a step in development of the FEIS. The FEIS contains revisions and updates identified since the Hearing along with responses to comments by agencies and individuals.

