G PUBLIC COMMENTS AND RESPONSES

COMMENT 1

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

I understand residential streets along Nyanza will not be impacted by the work to build the Gravelly Lake - Thorne Connector. I hope this will be the case, and that Nyanza will not be used as a through road for construction vehicles. I would appreciate getting updates on the project, particularly should Nyanza become involved. Thank you for the opportunity to share my thoughts.

Kate van Gelder

WSDOT Response – Comment 1

We have no reason to expect that Nyanza Road SW will be used in any substantial way by construction equipment associated with construction of the Gravelly-Thorne Connector.

We recommend periodic checks of the WSDOT project web site for updates on the project status. Currently, property needs to be purchased before construction of the Gravelly-Thorne Connector can proceed. The current intent is that construction of the Gravelly-Thorne Connector will occur between 2021 and 2025.

COMMENT 2

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

MAKE SHURE THE SOUND TRANSIT ROW IS KEPT INTACT FOR FUTURE DOUBLE TRACK EVEN THOUGH ITS OUT OF THE SCOPE OF THE PROJECT MAKE PROVISION FOR FUTURE HOV LANES IN WIDTH OF BRIDGES AND ACCESS RAMPS IN LAKEWOOD AT LAKEWOOD STATION.
MAKE SHURE THAT NEW FACILITIES IN TILLICOM WONT INTERFERE WITH THE ABILITY TO ADD A SOUNDER STATION THERE.

WSDOT Response – Comment 2

The only element of the proposed I-5 corridor improvements that would use a portion of the Sound Transit right of way is the Gravelly-Thorne Connector, which will require the use of 25 feet within the 100 foot wide Sound Transit right of way. The remaining 75 feet of right of way will support two railroad tracks in the future.

The fourth lane added by this project to each direction of I-5 is designed to be opened as a General Purpose (GP) lane and will be able to be converted to an HOV lane at such time as HOV lanes are extended from Tacoma to Thorne Lane.

The proposed reconfiguration of the I-5, Berkeley St. interchange will not preclude Sound Transit's construction of a Sounder station in Tillicum. Sound Transit's concept plan for this station takes the Berkeley interchange reconfiguration into account.

COMMENT 3

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

RL_ALBRIGHT@yahoo.com rL_albright@yahoo.com

Would like full size images of section 4 graphics / Boards section 8 emailed to me.

WSDOT Response – Comment 3

E-mailed with link to displays on 12/2/16.

COMMENT 4

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Nov 7, 2016

Please share your comments regarding the Environmental Assessment below:

Might be helpful to talk to local folks about the environment as it was - Looks like a lot of good work has been done.
Thanks for saving as many trees as you can.
Please plant native plants especially prairie plants are needed.
Thanks for bicycle paths / lanes / ways or what ever they are called now.
Keep far away from the logistic area.
Very nice people here -
Thanks.
Rochelle (Rocky) Giddings

WSDOT Response – Comment 4

According to WSDOT's policies and best practices, the I-5 JLBM Vicinity Congestion Relief Project will minimize removal of native vegetation to the greatest extent possible. Consistent with the WSDOT Roadside Policy Manual (WSDOT, 2015b), temporarily disturbed areas will be restored with native vegetation to an equivalent or better condition.

COMMENT 5

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

I live in the area & am mostly ~~[illegible]~~ concerned and affected by noise pollution.

I hope the new pavement & noisewalls are effective.

I heartily endorse taller & longer noisewalls.

WSDOT Response – Comment 5

As detailed in the Environmental Assessment and supporting Noise Discipline Report (May 2016), the I-5 JBLM Vicinity Congestion Relief Project will provide substantive benefit to the public concerning noise reduction in some areas within the project corridor. Noise wall analysis resulted in four noise walls proposed as part of the Build Alternative. The walls are expected to mitigate sound levels at 42 of the receptors (noise measurement locations) expected to be impacted.

COMMENT 6

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

Pierce Transit appreciates the strong collaboration we have had throughout this process and looks forward to working w/ WSDOT to ensure HOV lanes are incorporated into the final design of this corridor connecting finally to the HOV work near the Tacoma Dome HOV expansion project.

WSDOT Response – Comment 6

Pierce Transit is a key partner for these improvements. We look forward to continued close coordination as the improvements are further developed and implemented.

COMMENT 7

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

Phase 2 Construction Design Request

TOMMY DARNELL COMMANDER VFW 2329 in TILLICUM. WE ARE IN POSSESSION OF THE OLD MONUMENT AT THE EXIT 122. WE WOULD LIKE TO BE INVOLVED WITH REDOING IT IT IN THE TURN ABOUT CLOSEST TO MADIGAN WHEN THE TIME COMES.

TOMMY DARNELL 253-241-1939 cell

TOMMYd133@COMCAST.NET

WSDOT Response – Comment 7

We have extended an invitation to you to be part of the advisory group on architectural and aesthetic treatments along the project corridor.

COMMENT 8

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

(1) Glad to see Blvd of Remembrance oak trees are retained.

(2) Not certain I agree that impacts to Union Ave businesses will only occur during lane closures. Seem there will be impact as new interchanges do not directly provide traffic to Union Avenue and a portion of Union will be obscured by a sound wall.

WSDOT Response – Comment 8

There are 66 oak trees remaining from the original (1928-1930) Road of Remembrance between Nisqually and Ponders. Twelve of those oak trees are located between the Thorne Lane and Berkeley Street interchanges.

Those twelve trees are at risk based on the proposed reconfiguration of these interchanges. The northern six trees are at greater risk. Of the six northernmost trees, the northernmost four are in direct conflict with the proposed improvements, including a noise wall.

The proposed reconfigurations of the I-5 interchanges at Thorne Lane and Berkeley Street are expected to provide a much more efficient flow of traffic than existing interchanges. Part of this results from the intent to have the interchanges grade separated over the railroad track. We expect this to be increasingly meaningful once high-speed Amtrak train service starts on this rail line in late 2017. To provide the grade separation over the railroad track, the interchange must be elevated almost 30 feet above the existing interchange, resulting in the connections to roads in Tillicum being a few hundred feet west of Union Ave. While this is somewhat more circuitous than the existing roadways to access Union Ave., we believe improved traffic flow will compensate for the slightly increased distance. Customers of businesses on Union Ave. will be motivated by travel time more than by distance.

The proposed noise wall along the southbound on-ramp from the N. Thorne Lane interchange will shield residential properties only and will end prior to the commercial properties on Union Ave.

COMMENT 9

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

Your non-motorized & local connections look good.

They look much more economical compared to preliminary designs.

WSDOT Response – Comment 9

As an agency, we seek to include active transportation and community connection elements in our projects. Opportunities to support both of these were identified early and then further developed on this project.

COMMENT 10

Washington State Department of Transportation

Comment Sheet

I-5 JBLM Vicinity Congestion Relief Project

NEPA EA Open House and Public Hearing

November 7, 2016

Please share your comments regarding the Environmental Assessment below:

The traffic along Thorne Lane in and out of Camp Murray at 7-8:30 am., 11:30 - 12:30 P.M + 4-6 P.M is very heavy. It sometimes takes 15-20 min. to get from my driveway to the signal at I5/Thorne I live at [redacted].

WSDOT Response – Comment 10

The proposed design should relieve the delays you describe. The proposed reconfiguration of the I-5 interchange at Thorne Lane does not include any traffic signals. The proposed roundabouts are expected to provide a more efficient flow of traffic from North Thorne Lane to I-5 and between Tillicum and Woodbrook.

The reconfiguration of the I-5 interchange at Berkeley Street will also improve traffic flow to/from Camp Murray and relieve some of the demand currently focused on North Thorne Lane.

COMMENT 11

From: Cheryl Burlingame [redacted]
Subject: JBLM/I-5 Talking Points
Date: Nov 7, 2016, 2:48:21 PM
To: Ron Lucas [redacted]
Cc: Paul Loveless [redacted] Mark Burlingame
[redacted]

1. Steilacoom DuPont Rd. presently serves as the primary by-pass road whenever congestion occurs on northbound I-5 toward JBLM.
2. Motorists whose destination is JBLM north, Lakewood, University Place (or even S. Tacoma) simply get off the freeway, travel through Steilacoom and on to their destination. By doing so, it only adds about 10 minutes to their trip vs. staying on freeway when traffic is good---motorists are well aware of this alternative.
3. The impact is felt primarily at the intersection of Steilacoom/DuPont Rd. (Union Ave. in Town), where motorists attempting to avoid congestion intersect at the intersection of Union Ave./Martin St./Rainier St.---our residents know whenever traffic is bad on I-5 simply by noting the increased traffic at this location.
4. During the p.m. peak period, this can result in cars backing up on Rainer St. at the stop sign (westbound) well over 4 blocks, resulting in a Level of Service F condition and forcing motorists to dart out into traffic between small gaps in an attempt to gain access. Similarly, LOS conditions also decline at the intersection of Main St./Rainier St. (four way stop) in the center of Town.

---Now imagine this condition lasting consistently for four years, every day. Given the timelines for construction (overpasses and lane construction) outlined in the EA for this project, it is obvious even under the best of conditions, congestion will be consistent and motorists whose destinations are the locations cited will make this the standard way to get around the construction for up to 4 years, resulting in a significant adverse impact.

We recognize this upcoming impact and request the assistance of FHWA and WSDOT to help mitigate this anticipated condition now, before it impacts our residents on a daily basis.
1. We have conducted a traffic study (at our own expense) to look at alternatives to moving traffic through this intersection safely.
2. Based on this study and the engineer's recommendations, the Town Council has recommended adding a roundabout at this location.
3. While we do not have the construction funds secured, we have completed a conceptual design (at our own expense) and stand ready to complete the engineering design within 6 months of securing the construction funds.
4. The conceptual design reveals we have sufficient right of way (or can obtain any additional needed right-of-way from Town owned property). This makes the project

WSDOT Response – Comment 11

We understand the concern that residents of Steilacoom have with existing traffic congestion on Union Avenue, particularly at the intersection with Martin/Rainier Street. This location is impacted not only by local traffic, but also by traffic destined for the ferry terminal and, periodically, by drivers that choose to use local streets instead of I-5.

One of the regional challenges as traffic demand exceeds the capacity of the overall transportation system is the shifting of traffic patterns between local and county roads, state highways and interstate highways. Study of traffic demand on I-5 through JBLM identified that a key element of that demand is drivers making local (short distance) trips on the interstate highway. When I-5 becomes congested, some drivers making short trips shift to using local and county roads. As described in your letter, this is an existing condition in Steilacoom.

During construction of the project, we intend to keep the existing number of lanes on I-5 open to traffic between 5:00 a.m. and 8:00 p.m. on weekdays. We intend to apply standard restrictions on temporary lane closure timing to allow construction activities. Temporary lane closures will be permitted between 8:00 p.m. and 5:00 a.m. We do not expect any detours routing traffic from I-5 onto local streets. The exception to this is at the

COMMENT 11 (CONTINUED)

feasible to construct quickly.

We request the EA for this project recognize this previously overlooked impact and include the construction of a roundabout at this location, funded through a partnership by/between the Town of Steilacoom and FHWA/WSDOT. While we recognize the long-range benefits of the completion of the
JBLM/I-5 Corridor Project and support the completion of those improvements, we must recognize the impacts this project will have on the Town of Steilacoom throughout the 4 year construction period.

Hope this is helpful. We will follow up with a letter to this effect before comment deadline of 11/22/16
Thanks Mayor!
Mark

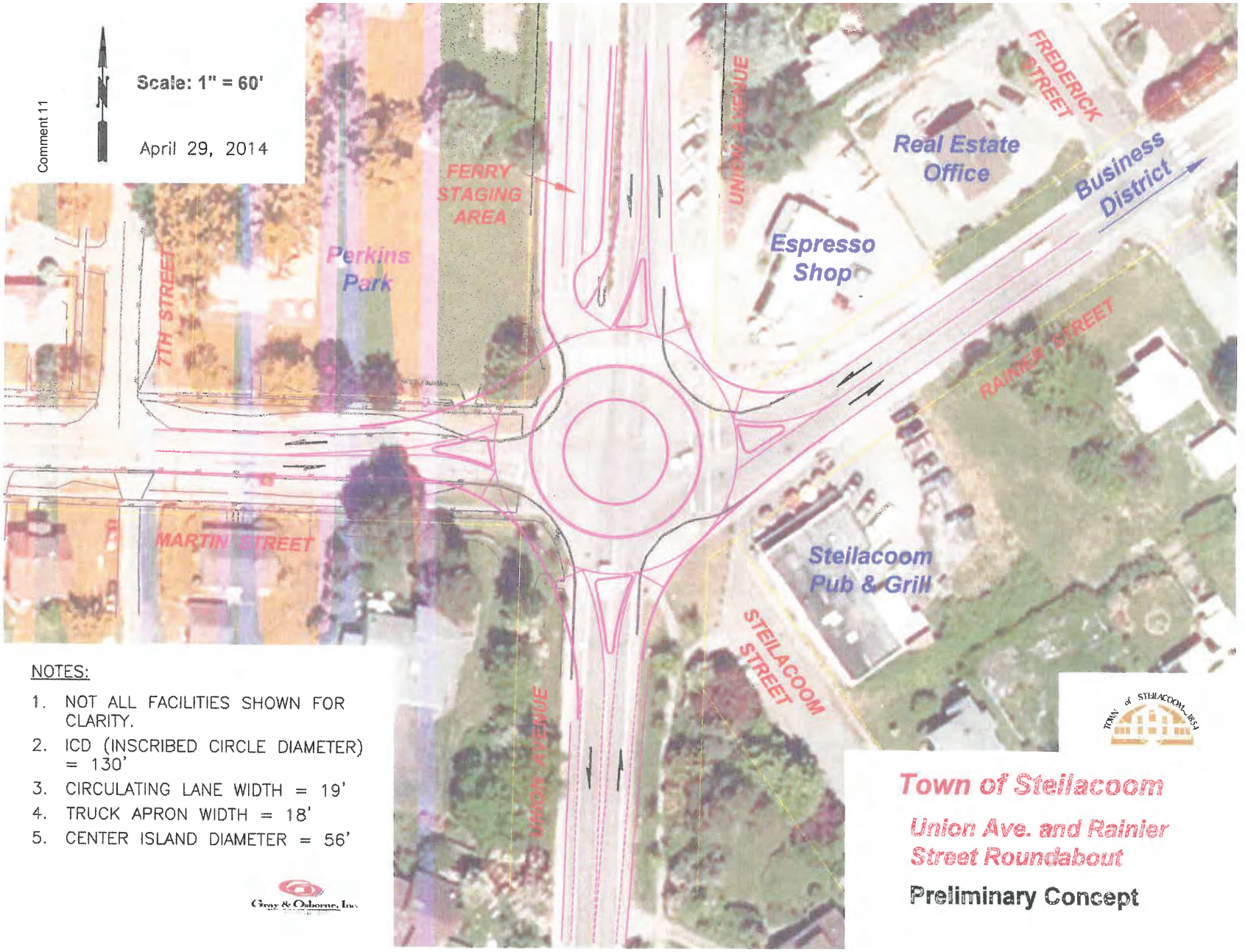
WSDOT Response – Comment 11

Thorne Lane (Exit 123) and Berkeley Street (Exit 122) interchanges where temporary closures of ramps are necessary that will affect traffic patterns on local roads in Tillicum.

Maintaining traffic flow on I-5 during construction will be a high priority of the project. We have no reason to expect that any direct action of the I-5 improvement project through JBLM will detour traffic onto local streets in Steilacoom. Improving roads and intersections in Steilacoom is outside the scope of the I-5, JBLM Vicinity Congestion Relief Project.

As part of the I-5 widening project, a Transportation Management Plan (TMP) will be implemented. The TMP will address mobility and safety through the construction zone. Stakeholders have been invited to participate in the development of the TMP. During the Design-Build construct, the TMP will guide public information strategies as well as opportunities for stakeholder involvement in traffic management as the project evolves.

COMMENT 11 (CONTINUED)



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COMMENT 12

From: [redacted]
Sent: Tuesday, November 15, 2016 5:21 AM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/15/2016 5:20:58 AM

======My Contact information======
Name: Helen Greenwell
E-mail: [redacted]
Phone:
Street Address:
City:
State: WA
Zip Code:

===== My Question/Comment/Complaint =====

This is a total waste of taxpayers money, you could definitely be putting our money to better use. None of this is needed, please see my notes below.

The proposed build alternative at Thorne Lane is a waste of taxpayer dollars. The Thorne Lane interchange is not a place of congestion and the cost of this part of the project is incredibly misaligned!

On page 209, section 4.15 of the Environmental Assessment states that the Lakewood-Woodbrook neighborhood, ". . . most of land is vacant or under-utilized." Why are you spending $495 million to create a giant roundabout and off-ramp to an area that is "vacant?" Clearly, this is a political handout to the legislative group that supported the Cross-base Highway and WSDOT is proposing to misuse taxpayer dollars to line the pockets of the politicians.

Your own report states that the improvements from the entire JBLM Congestion Relief project, once completed, will only accommodate 49% of peak PM hour demand on I-5 by 2040 (section 4.3 of EA). Why would we spend $495 million dollars on supposed congestion-relief for I-5 that won't support even 50% of expected traffic by 2040? Further proof that the proposed build alternative is NOT supporting congestion relief, but instead aligning money to political pockets.

Finally, on table 4.2.1 of the EA, this report found that the build alternative, "would enhance safety, particularly for low income residence of . . . Woodbrook." Creating the Thorne Lane proposed interchange will only increase the traffic along 150th Street and continue to cause risk to low-income residence of Woodbrook who travel by foot along that roadway. There is no obvious benefit of "safety" to those residents! Only increased risk to them as they travel to and from local areas such as Woodbrook Middle School, Mr. Lee's FoodMart and bus stops. Increasing the access to the freeway at higher speeds means only more speeding, semi-trucks and increased traffic along 150th Street SW to Perimeter Road thus further endangering the local residents. Clearly your report is biased and wrong – visit the Woodbrook neighborhood during rush-hour on a Friday night and see how dangerous you will make this low-income neighborhood.

WSDOT Response – Comment 12

The primary reason for rebuilding the Thorne Lane interchange is so that I-5 can be widened to add one lane each direction. Significant traffic congestion on I-5 in the area of the Thorne Lane interchange during peak traffic periods has become commonplace and is having a direct detrimental impact of the mobility of people and goods along this strategic north-south highway. The existing bridge over I-5 at the Thorne Lane interchange– built in 1954 – will not allow any additional lanes on I-5. We have received many public comments complaining about traffic congestion and delays on Thorne Lane at the interchange with I-5.

Several alternatives for configurations of the Thorne Lane interchange were evaluated. Considering the upcoming high speed Amtrak train service that will use the railroad corridor next to I-5, re-building the interchange to cross over top of the railroad track was determined to be appropriate. Having the intersections of the I-5 ramps with Thorne Lane/Murray Road configured as roundabouts is expected to provide for a safe and efficient flow of traffic well into the future.

The funding allocation of $495 million is for improvement of eight miles of the I-5 corridor, not just the one interchange at Thorne Lane. The estimated cost of the Thorne Lane interchange

WSDOT Response – Comment 12 (continued)

is only about 15% of the budgeted improvements along the I-5 corridor through JBLM.

The proposed reconfiguration of the I-5 interchange at Thorne Lane has independent utility from the previously proposed SR 704, Cross Base Highway. Independent utility means the project provides benefit even if no additional transportation improvements are made in the area.

In 2020, the proposed improvements are forecast to allow 97.9% of the traffic demand during the 3 hour weekday p.m. period to pass through the corridor. Without the proposed improvements only 90.5% of the peak period demand would pass through. A 7.4% increase in throughput (97.9 – 90.5) equates to thousands of vehicles that would be unable to pass through the corridor during the peak traffic periods.

We agree that by 2040, the proposed Build Alternative is not sufficient to support the forecast peak period traffic. However, it is still expected to be much better than what the No Build (existing) facility would support. During the 3 hour peak traffic period forecast for 2040, the proposed Build Alternative would allow 80% of the traffic demand to pass through the corridor. The No-Build alternative would allow only 71.6% of the traffic demand to pass through the corridor. Again, that difference is thousands of vehicles during the AM and PM peak traffic periods every weekday.

COMMENT 13

From: [redacted]
Sent: Friday, November 18, 2016 2:23 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/18/2016 2:22:34 PM

======My Contact information======
Name: Jacqueline Fritz
E-mail: [redacted]
Phone:
Street Address: [redacted]
City: Sumner
State: WA
Zip Code: 98390

===== My Question/Comment/Complaint =====

It has taken way too long for the congestion on I-5 around JBLM to be addressed. The proposed plan is a step in the right direction but has a glaring inconsistency at the proposed Thorne Lane interchange. That elaborate interchange is overkill given the number of people who use that exit and will not reduce congestion on I-5 significantly. The proposed Thorne Lane interchange does not support the purpose of the JBLM Congestion Relief Project and is a huge waste of tax payer money. The design of that interchange should be scaled back to match the number of residents that use that exit. The funding should be redirected to improvements at interchanges south of the base which will have a much greater pay back in reducing the congestion on I-5.

WSDOT Response – Comment 13

The primary reason for proposing rebuilding the Thorne Lane interchange is so that I-5 can be widened to add one lane each direction. Significant traffic congestion on I-5 in the area of the Thorne Lane interchange during peak traffic periods has become commonplace and is having a direct detrimental impact of the mobility of people and goods along this strategic north-south highway. The existing N. Thorne Lane bridge over I-5 – built in 1954 – will not allow any additional lanes on I-5.

Reconfiguration of the Thorne Interchange is consistent with the stated project Purpose of improving local road and mainline system efficiency and mobility.

Several alternatives for configurations of the Thorne Lane interchange were evaluated. Considering the upcoming high speed Amtrak train service that will use the Sound Transit railroad corridor next to I-5, re-building the interchange to cross over top of the railroad track was determined to be appropriate. Having the intersections of the I-5 ramps with Thorne Lane/Murray Road configured as roundabouts will provide for a safe and efficient flow of traffic well into the future.

The proposed reconfiguration of the Thorne Lane interchange includes facilities for pedestrians and bicyclists that do not currently exist. These facilities will enhance safety. Roundabout intersections have been shown to be much safer than intersections with traffic signals or stop signs.

The I-5 interchange at Thorne Lane serves Woodbrook, Tillicum, JBLM's Logistics Gate and Camp Murray. The proposed configuration of the I-5 interchange at N. Thorne Lane is designed to support traffic demand through 2040 and beyond.

COMMENT 14

From: [redacted]
Sent: Tuesday, November 15, 2016 5:49 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/15/2016 5:49:05 PM

======My Contact information======
Name: Tami Masters
E-mail: [redacted]
Phone: [redacted]
Street Address: [redacted]
City: Lakewood WA
State: WA
Zip Code: 98439

===== My Question/Comment/Complaint =====

This plan does not take into consideration large volume of trucks and trailers entering the freeway. Lakewood plans on an industrial park in this location.Military vehicles entering these round abouts is ludicrous. They (the round abouts) are not designed for large vehicle traffic. Also the area has a lot of foot traffic and the plan for people to get from one side of the freeway to the other is ridiculous. This project is over priced unnecessary and disruptive to our community. I would not support this plan as it stands. If you are interested in putting together a reasonable design, I might consider approving it. Please heed my warning. Before you make a huge mistake. I as a taxpayer DO NOT Approve this design. Thank you for your time, Tami Masters.

WSDOT Response – Comment 14

The study and plan do account for trucks and trailers. The highway lanes, ramps, intersections and roundabouts are designed to handle a semi-truck cab with a 53-foot long trailer (referred to as a "WB-67"), which is the largest truck allowed on highways without a special permit. The design of the highway lanes, ramps, roundabouts will also handle "lowboy" trucks that are used to carry large equipment including military vehicles.

Regarding pedestrian access, the overall plan establishes a continuous nonmotorized route, in addition to providing pedestrian and bicycle facilities access across I-5 at the Thorne Lane and Berkeley Street Interchanges. The final design of pedestrian routes across the interchanges is not complete, and may revise the pedestrian routes shown to date. What is certain is that a safe route for both pedestrians and cyclists will be provided at both Thorne Lane and Berkeley Street.

COMMENT 15

From: [redacted]
Sent: Wednesday, November 16, 2016 12:01 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/16/2016 12:01:05 PM

======My Contact information======
Name: Marjory Swalley
E-mail: [redacted]
Phone:
Street Address:
City:
State: WA
Zip Code:

===== My Question/Comment/Complaint =====

Our tax dollars can be spent in more productive ways.

WSDOT Response – Comment 15

We appreciate your perspective and opinion. Congestion relief in the JBLM corridor has been made a high priority by local and state elected officials.

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COMMENT 16

From: [redacted]
Sent: Monday, November 14, 2016 9:02 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/14/2016 9:01:34 PM

======My Contact information======
Name: Emily
E-mail: [redacted]
Phone:
Street Address:
City:
State: WA
Zip Code:

===== My Question/Comment/Complaint =====

The cross base highway is a waste of our taxpayer money. On Washington state environmental assessment, on page 209, it states that this land is is vacant. Why are we spending $495 million dollars to build a road to a vacant area? This project will only help a minority of JBLM people. By 2040 it will only help 49% of military based conjestion. It is a disgrace to spend 495 million dollars to not even fix half the problem. This is just another way to unneseccarily spend taxpayer money. Finally, on table 4.2.1 of the EA, it proves that traffic will just increase around 150th street. This increase in traffic will jeprodise the safety of children at woodbrook middle school, the inhabitants of this low income neighborhood, and all the people driving this low lit and high crime area at night.

WSDOT Response – Comment 16

The I-5, JBLM Vicinity Congestion Relief project is not proposing to build the Cross Base (SR 704) Highway. It is proposing to improve the I-5 corridor through JBLM to improve mobility for people and freight. The SR 704 Cross Base Highway proposal is not part of the I-5 congestion relief program of improvements. The lack of foreseeable funding, the fact that the Cross Base Highway is not in a fiscally constrained improvement plan, the lack of actionable NEPA Record of Decision (ROD), and the fact that the NEPA ROD is stayed in Western Washington's Western District U.S. District Court all make the Cross Base Highway not a reasonably foreseeable project (see page 234).

I-5 is the primary north-south highway on the west coast of the U.S. and in the JBLM area currently carries over 120,000 vehicles each day. Over the next 20 years, the daily traffic demand on I-5 in this area is forecast to increase to above 190,000 vehicles each day.

The $495 million allocated by the state legislature for improvements by this project is for eight miles of the I-5 corridor, from DuPont to Lakewood. This is certainly not a "road to a vacant area." This strategic corridor is used by well over 150,000 people every day. While the people travelling to and from JBLM each working day are only a portion of the people using the I-5 corridor, they

WSDOT Response – Comment 16 (continued)

are certainly an extremely important element of our region and national defense.

During weekday peak traffic periods, about half of the traffic on I-5 through JBLM is regional traffic that does not enter or exit I-5 in the JBLM area. Peak period traffic congestion in this area is a much bigger issue than "JBLM traffic." In 2020, the proposed improvements are forecast to allow 97.9% of the traffic demand during the 3 hour weekday p.m. period to pass through the corridor. Without the proposed improvements only 90.5% of the peak period demand would pass through. During the 3 hour peak traffic period, almost 22,000 vehicles are expected to travel through the corridor – each direction. A 7.4% increase in throughput (97.9 – 90.5) equates to thousands of vehicles during the AM and PM peak traffic periods every weekday.

We agree that by 2040, the proposed Build Alternative is not sufficient to support the forecast peak period traffic. However, it is still expected to be much better than what the No Build (existing) facility would support. During the 3 hour peak traffic period forecast for 2040, the proposed Build Alternative would allow 80% of the traffic demand to pass through the corridor. The No-Build alternative would allow only 71.6% of the traffic demand to pass through the corridor. Again, that difference is thousands of vehicles during the 3 hour peak traffic period.

The proposed reconfiguration of the Thorne Lane interchange includes facilities for pedestrians and bicyclists that do not currently exist. These facilities will enhance safety. Roundabout intersections have been shown to be much safer than intersections with traffic signals or stop signs. The proposed design for the interchanges will not encourage higher speeds. On the contrary, roundabouts are built to keep speeds low. Roundabouts do provide a more efficient flow of traffic, but not at high speeds.

COMMENT 17

From: [redacted]
Sent: Tuesday, October 25, 2016 5:04 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 10/25/2016 5:04:03 PM

======My Contact information======
Name: Lee Chambers
E-mail: [redacted]
Phone: [redacted]
Street Address: [redacted]
City: Olympia
State: WA
Zip Code:

===== My Question/Comment/Complaint =====

Your description suggests a round about beside Gerties Restaurant in Lakewood. Really? I'd bet the Gerties' parking lot will take a critical hit, if a roundabout is built at that intersection.

That restaurant has been a favorite stopping-place for my family for many years. It's a "family-style restaurant", not a fast -food chain joint. We hate them, by the way. But I digress. What's in this project to ensure that Gerties is still accessible from the freeway and has adequate parking? Or are you building where Gerties once was?

WSDOT Response – Comment 17

The proposed re-configuration of the I-5/Berkeley Street interchange will not require use of any property currently used by Gertie's restaurant, including the parking area. Access to Union Avenue and Gertie's Restaurant will be improved with the re-configuration.

COMMENT 18

From: [redacted]
Sent: Monday, October 24, 2016 6:54 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 10/24/2016 6:53:36 PM

======My Contact information======
Name: Jeremiah Brittain
E-mail: [redacted]
Phone: [redacted]
Street Address: [redacted]
City: Olympia
State: WA
Zip Code:

===== My Question/Comment/Complaint =====

If possible, I think it would be a good idea to put a 6-8 foot asphault strip along the interstate for use as a bike lane. That would also require an extension off one side of the Nisqually River bridge as a pedestrian lane. I commute daily from Olympia to JBLM and would definitely ride my bike 2-3 times per week if a safe route was available. Thanks.

WSDOT Response – Comment 18

A 3.7 mile long 12-foot wide bicycle and pedestrian path is proposed between Berkeley St. and Steilacoom-DuPont Rd.

The Nisqually River bridge is well south of the project limit. Bicycle and pedestrian connectivity south of this project would be the subject of future improvements to I-5.

COMMENT 19

From: [redacted]
Sent: Thursday, November 03, 2016 10:00 AM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/3/2016 10:00:16 AM

======My Contact information======
Name: Andrew
E-mail: [redacted]
Phone: [redacted]
Street Address: [redacted]
City: Kenmore
State: WA
Zip Code:

===== My Question/Comment/Complaint =====

For improving congestion along the JBLM corridor, please avoid from adding lanes - I am a transportation engineer and expanding freeways worsens the problem everywhere, this is why I am so surprised WSDOT's solution to everything is more lanes.

The solution is alternatives. The Portland-Seattle corridor needs local and express high-speed intercity rail. Road congestion will always exist on I-5 even if it's 50 lanes wide. Widening I-5 is like trying to put out a widespread fire with a garden hose.

Solution: High-speed rail

WSDOT Response – Comment 19

There are many causes of congestion on this portion of I-5, from weekday single-occupant-vehicle commuters to miles-long weekend backups of vehicles filled with families. This project does not provide a final solution to congestion in the area.

High speed rail, as you suggest, is a part of the solution. The Point Defiance Bypass Project is making improvements to increase high speed rail service between Seattle and Portland. This project is currently under construction. The I-5, JBLM Vicinity Congestion Relief Project evaluated numerous alternatives utilizing various combinations of added lanes, restricted lanes, JBLM gate access points, and multimodal options including the PSRC Vision 2040 transit improvements proposed for the corridor (which includes extension of Sounder rail service to DuPont). A key criterion in evaluating all multimodal and local street options was the effectiveness on reducing traffic congestion along I-5. Analysis found that even with a doubling of existing express bus service in the corridor, there would be insufficient congestion relief on I-5 to eliminate the need for highway widening. The preferred build option best addresses as many highway-addressable deficiencies and goals as possible.

COMMENT 20

From: [redacted]
Sent: Monday, November 14, 2016 8:54 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/14/2016 8:54:22 PM

======My Contact information======
Name: Emily
E-mail: [redacted]
Phone:
Street Address:
City:
State: WA
Zip Code:

===== My Question/Comment/Complaint =====

This project is taking away our beautiful land. Acres of forest are going to be demolished. Washington is loosing all its beauty by demolishing the natural lmf for another concrete highway. There has to be another way, a better planned and less encompassing way to help traffic. Washington doesn't need to loose another woodland area that is relished by many citizens

WSDOT Response – Comment 20

We looked extensively at congestion relief solutions for the corridor as described in Chapter 3.3 of the EA. Ultimately, the most promising alternative to relieve congestion was selected as the Build Alternative.

The Project will minimize removal of native vegetation to the greatest extent possible. Consistent with the *WSDOT Roadside Policy Manual* (WSDOT 2015), temporarily disturbed areas will be restored with native vegetation to an equivalent or better condition. Concerning oak community impacts, we have added some detail to our findings during the public comment period. Please see Comment 34L and Comment 36.

COMMENT 21

From: [redacted]
Sent: Tuesday, October 25, 2016 4:18 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 10/25/2016 4:17:47 PM

======My Contact information======
Name: Anita weaklev
E-mail: [redacted]
Phone:
Street Address: [redacted]
City: Lakewood
State: WA
Zip Code: 98498

===== My Question/Comment/Complaint =====

I have a home and my taxes went up for this project. I have been driving over the tracks entering Tillicum for over two years now. I have had to repair the front end of car axial for $160 due to that improvement-road coming up. When is that spot going to be corrected?

WSDOT Response – Comment 21

Property taxes are not used to fund the proposed I-5, JBLM Vicinity Congestion Relief project. The source of project funding is tax on gasoline purchases.

A project (Point Defiance Bypass) is currently under construction to upgrade the railroad track next to I-5 so that high speed Amtrak trains can start using this line in 2017. This work includes improving the road crossings of the railroad track at both Thorne Lane and Berkeley Street. This is a separate project from the I-5, JBLM Vicinity – Congestion Relief.

The proposed reconfiguration of the interchanges at Thorne Lane and Berkeley Street will elevate the roadways over the top of the railroad tracks on bridges. Once these reconfigured interchanges are complete vehicles on North Thorne Lane and Berkeley Street will not directly drive over the railroad tracks.

COMMENT 22

From: [redacted]
Sent: Monday, November 14, 2016 9:51 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/14/2016 9:50:39 PM

======My Contact information======
Name: RJ WEST
E-mail: [redacted]
Phone:

===== My Question/Comment/Complaint =====

Your own report states that the improvements from the entire JBLM Congestion Relief project, once completed, will only accommodate 49% of peak PM hour demand on I-5 by 2040 (section 4.3 of EA). Why would we spend $495 million dollars on supposed congestion-relief for I-5 that won't support even 50% of expected traffic by 2040? Further proof that the proposed build alternative is NOT supporting congestion relief, but instead aligning money to political pockets.

Finally, on table 4.2.1 of the EA, this report found that the build alternative, "would enhance safety, particularly for low income residence of . . . Woodbrook." Creating the Thorne Lane proposed interchange will only increase the traffic along 150th Street and continue to cause risk to low-income residence of Woodbrook who travel by foot along that roadway. There is no obvious benefit of "safety" to those residents! Only increased risk to them as they travel to and from local areas such as Woodbrook Middle School, Mr. Lee's FoodMart and bus stops. Increasing the access to the freeway at higher speeds means only more speeding, semi-trucks and increased traffic along 150th Street SW to Perimeter Road thus further endangering the local residents. Clearly your report is biased and wrong – visit the Woodbrook neighborhood during rush-hour on a Friday night and see how dangerous you will make this low-income neighborhood.

WSDOT Response – Comment 22

In 2020, the proposed improvements are forecast to allow 97.9% of the traffic demand during the p.m. peak period to pass through the corridor. Without the proposed improvements only 90.5% of the peak period demand would pass through. This difference equates to thousands of vehicles that would be unable to pass through the corridor during the peak traffic periods.

The Build Alternative is focused on meeting forecast traffic demand in the near term. We agree that by 2040, the proposed Build Alternative is not sufficient to support the forecast peak period traffic. However, it is still expected to be much better than what the No Build (existing) facility would support.

The primary reason for rebuilding the Thorne Lane interchange is so that I-5 can be widened to add one lane each direction. Significant traffic congestion on I-5 in the area of the Thorne Lane interchange during peak traffic periods has become commonplace and is having a direct detrimental impact of the mobility of people and goods along this strategic north-south highway. The existing Thorne Lane bridge over I-5 – built in 1954 – will not allow any additional lanes on I-5. We have also received many public comments complaining about traffic congestion and delays on Thorne Lane at the interchange with I-5.

The funding allocation of $495 million is for improvement of eight miles of the I-5 corridor, not just the one interchange at Thorne Lane. The estimated cost of the N. Thorne Lane interchange is only about 15% of the total improvements along the I-5 corridor through JBLM.

The proposed reconfiguration of the Thorne Lane interchange includes facilities for pedestrians and bicyclists that do not currently exist. These facilities will enhance safety. Roundabout intersections have been shown to be much safer than intersections with traffic signals or stop signs. The proposed design for the interchanges will not encourage higher speeds. On the contrary, roundabouts are built to keep speeds low. Roundabouts do increase the flow of traffic, but not at high speeds.

COMMENT 23

November 22, 2016

Washington Department of Transportation
Olympic Region
Attn: John Wynands
Assistant Region Administrator for Project Development
P.O. Box 47440
Olympia, WA 98504-7440
wyanandj@wsdot.wa.gov

Re: Comments on I-5 JBLM Vicinity Congestion Relief Project: Environmental Assessment, October 2016

Dear Mr. Wynands:

The Woodbrook Hunt Club, along with Conservation Northwest, the Tahoma Audubon Society, and the American Lake Garden Equestrian Alliance are in a lawsuit against the United States Department of Transportation over its 2010 Environmental Impact Statement for the proposed Joint Base Lewis-McChord Cross-Base Highway (SR 704). *See Woodbrook Hunt Club, et al. v. U.S. Department of the Interior, et al.*, Case No. 3:10-cv-05527-BHS (W.D. Wash. July 28, 2010) (herein, "Cross-Base Highway Lawsuit"). The Washington Department of Transportation is a defendant in that lawsuit. Three segments of the Crossbase Highway, SR 704, are included in the lawsuit, the Thorne Lane interchange, the Gravelley-Thorne Connector Road and the six-mile stretch of four lane highway through Joint-Base Lewis-McChord. The first segment of the Crossbase Highway, Spanaway Loop Road was completed in 2009.

a. The JBLM Congestion Relief Transportation Package has received funding and includes two of the three segments in the litigation, the Thorne Lane Interchange and the Gravelley-Thorne Connector Road. When the Stay Agreement was under discussion, we were told by WSDOT that the Gravelley-Thorne Connector Road had independent utility, as the Environmental Justice neighborhood of Tillicum was landlocked, and in the case of a train derailment, emergency vehicles would not be able to get into Tillicum, lives were at stake. The reason this road is in the lawsuit is that it was specified by Federal Highways as a requirement if the Crossbase Highway were built to help mitigate local traffic.

The design now for the Thorne Lane and the Berkeley Interchanges, which bookend Tillicum, is to go over the railroad tracks, so the independent utility is gone. The new Thorne Lane interchange for JBLM congestion relief is being built in exactly the location where it was originally designed to connect to the Crossbase Highway. We understand that in order to allow traffic to continue to move during the construction of the interchange, that the interchange must be moved. But the current design in the exact location will make it very easy to construct the Crossbase Highway in the future, that last 6-mile highway will basically just be a plug'n'play road between the already constructed Spanway Loop Road at one end, and the re-built Thorne Lane interchange at the other end.

b. We believe there is no justification to build the very expensive, one-mile Gravelley-Connector Road, it would be one of ten lanes and one bike/ped lane in a one-mile stretch of road between Thorne Lane and Gravelley Lake Drive. The Environmental Justice neighborhood of Tillicum would be better served by the bicycle/pedestrian lane and more bus service at peak times. In addition, the Gravelley-Thorne Connector Road and the auxillary road on the other side of I-5 appear to be non-freeway lanes and exceed the WSDOT Practical Design policy to build projects for the least costs rather than adding elements that are needed for system wide improvements.

WSDOT Response – Comment 23

a. The JBLM project meets a stand-alone need to address chronic peak period traffic congestion and improve mobility through the I-5 corridor. It does not facilitate the Cross Base Highway concept and as a result, does not violate the 2010 Motion for Stay.

b. The Gravelly-Thorne Connector road was one of many alternative local road improvements considered to relieve congestion on I-5. It provides significant southbound capacity for afternoon peak hour traffic travelling from Lakewood to the Tillicum and Woodbrook neighborhoods. The Gravelly-Thorne Connector road also provides a direct local road connection for emergency responders responding to Tillicum and Woodbrook from Lakewood. Additionally, the Gravelly-Thorne Connector has long been supported by the City of Lakewood as evidenced by its incorporation in the City Transportation Improvement Plan. The Gravelly-Thorne Connector road provides a specific purpose to relieve congestion on I-5 and has independent utility from the Cross Base Highway project.

c. While the JBLM Unity Bridge will undoubtedly provide some level of relief for short trips on Interstate 5 that have an origin and destination on base, it does not provide

COMMENT 23 (CONTINUED)

C. JBLM has also constructed the Unity Bridge that links Ft. Lewis to McChord. A year ago if military personnel or civilians working on JBLM needed or wanted to go from Ft. Lewis to McChord, they were required to go out onto I-5 and re-enter at a different gate. The completion of this bridge has taken thousands of trips off I-5, and while the Gravelley-Thorne Connector Road would be nice for local residents to go from Throne Lane or Tillicum to the Lakewood Mall, we cannot see any justification for the huge amount of taxpayer's money that would go toward that one-mile, one-way road. Taking the Gravelley-Thorne Connector Road out of the JBLM plan would go a long way in our discussion of the Stay Agreement staying stayed, which we hope to have with the interested parties of the lawsuit soon.

Very truly yours.

Melody Fleckenstein, MFH Woodbrook Hunt Club

Debra Flynn, President Woodbrook Hunt Club

WSDOT Response – Comment 23

needed connectivity between Lakewood and the Tillicum and Woodbrook neighborhoods the planned Gravelly-Thorne Connector will provide.

COMMENT 24

From: [redacted]
Sent: Monday, November 21, 2016 7:20 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/21/2016 7:19:52 PM

======My Contact information======
Name: kirk kirkland at Tahoma Audubon Society
E-mail: [redacted]
Phone: [redacted]
Street Address: [redacted]
City: University Place
State: WA
Zip Code: 98466

===== My Question/Comment/Complaint =====

Date: November 21, 2016

Regarding: I5—JBLM Congestion Relief Project – Environmental Assessment

To. John Wynands
Olympic Region
5720 Capitol Boulevard
Tumwater, WA

From: Tahoma Audubon Society & Kirk Kirland

Mr. Wynands.

a. Tahoma Audubon Society (TAS) has concerns about the widening Interstate 5 to 11 lanes between Thorne Lane and the Gravely Lake Exit. This proposal is in conflict with WSDOT's Practical Design Policy and is in conflict with a 2010 Stay Agreement regarding SR 704 -- also known as the Cross Base Highway.

TAS and WSDOT are a party to the Stay Agreement. The mission of TAS is to connect people to nature. Our 1400 members live within Pierce County and actively use wetlands and prairies for birding and wildlife studies which are located along the proposed boundaries of the Cross Base Highway. The designer routed the proposed the four lane highway to a quite spring known as Audubon Springs.

The Pierce County's Biodiversity Network Assessment describes these wetlands, prairies and oak savannah on the military bases as "the most biological and ecologically rich areas remaining in the lowland mature forests of the county". These habitats support 20 state or federally listed species, 24 Priority Habitat and Species and 10 at-risk species among a dozen other plants and animals that add to the diversity along the boundaries of the proposed highway.

The SR704 Cross Base Highway is not programmed for funding now nor in 2035. Nor is the Cross Base described in the EA for the JBLM Section of Interstate 5. It appears that the extra lanes added between Thorne lane and Gravely lake are the second section of Cross Base Highway which is a violation of the Stay Agreement of 2010. This proposed expansion of I-5 calls for 8 freeway lanes needed to resolve congestion then adds 3 extra lanes only from Thorne Lane and Gravely Lake Exit.

WSDOT Response – Comment 24

a. The JBLM project meets a stand-alone need to address chronic peak period traffic congestion and improve mobility through the I-5 corridor. It does not facilitate the Cross Base Highway concept and as a result, does not violate the 2010 Motion for Stay.

b. The Build Alternative will provide for dedicated pedestrian and bicycle facilities from the Gravelly Lake Drive interchange to the Thorne Lane interchange, and from the Berkeley Street interchange to existing pedestrian facilities in DuPont. Further consideration of pedestrian facilities in the South Study Area are not currently planned but could be identified as specific design and environmental analysis occurs for the South Study Area.

c. The Gravelly-Thorne Connector road was one of many alternative local road improvements considered to relieve congestion on I-5. It provides significant southbound capacity for afternoon peak hour traffic travelling from Lakewood to the Tillicum and Woodbrook neighborhoods. The Gravelly-Thorne Connector road also provides a direct local road connection for emergency responders responding to Tillicum and Woodbrook from Lakewood. Additionally, the Gravelly-Thorne Connector has long been supported by the City

COMMENT 24 (CONTINUED)

One lane of the three lanes is for bicycle and pedestrian access which is badly needed as there is no other access to Tillicum from Lakewood without walking or cycling on the freeway. On numerous occasions I have encountered pedestrians walking along the shoulder as I bicycle on this section of freeway often. These soldiers had no other access to American Lake Gardens or Tillicum without a 12 mile walk circumnavigating McChord Field or 3 mile hike to North Gate of Fort Lewis.

b. We recommend that this bike path be extended from Gravely Lake -- along the freeway to Mounts Road. This completes an alternative transportation link for cyclist and pedestrians who use this heavily traveled freeway when commuting between Lakewood to Olympia. There is no bicycle alternative to the freeway between Lakewood and Mounts Road without cycling on the freeway.

c. TAS and Conservation Northwest are opposed to the 2 additional non-freeway lanes which the EA designates as emergency lanes for use by less then 70 cars daily. In 2004 the Federal Highway Authority called for building additional lanes on Interstate 5 as a requirement to mitigate for the increased highway traffic resulting from the completion of the Cross Base Highway. Such construction is contrary to the Stay Agreement of 2010. This would second section built for the Cross Base Highway without an EA.

In addition these 2 non-freeway lanes exceeds the WSDOT Practical Design policy to build projects for the least costs rather then adding elements that are needed for system wide improvements. Although the Puget Sound Regional Council includes the Cross Base Highway in Vision 2040, the highway is listed as "unprogramed" with a target date of 2035. To comply with conditions in the Stay Agreement the EA should make it clear that WSDOT is not building a second section of the Cross Base Highway.

In 2004 FHWA completed NEPA with a decisions to construct a six mile long highway from SR 7 to Interstate 5. In 2009 Spanaway loop to SR 7 section of the highway was completed. To show good faith with the Stay agreement, we suggest you remove signs indicating Spanaway loop section is a portion of the Cross Base Highway. We request you make the following changes to the EA for JBLM:

d. o Remove references to SR 704 -- Cross Base Highway from WSDOTS scope of work and the list of projects available for funding.

e. o Edit the statement in the Cumulative Effects section of the Environmental Assessment for JBLM to clarify that "SR 704 requires additional environmental analysis to update the conditions and policies in the 2004 FHWA and NEPA documents for the project.

f. o Add information to the EA about the 2010 lawsuit challenging the ROD EIS and ESA review for SR704 and mention the Stay Agreement which was agreed to by all parities and which remains in place today.

Thank you for this opportunity to comment on the Environmental Assessment for this project. We support the additional freeway lanes and expansion of the bike path. The improvement of the overpasses are important for the planned economic development in American Lake Gardens and for the increase in employment at Fort Lewis. We look forward to working with the staff to resolve the unresolved issues for the Cross Base Highway which are outlined in the Stay Agreement of 2010.

Sincerely,

Kirk Kirkland

[redacted]

Copy of comment sent by mail Nov 21, 2016

WSDOT Response – Comment 24

of Lakewood as evidenced by its incorporation in the City Transportation Improvement Plan. The Gravelly-Thorne Connector road provides a specific purpose to relieve congestion on I-5 and has independent utility from the Cross Base Highway project.

d. WSDOT cannot unilaterally dismiss the Cross Base Highway project. As a regionally significant transportation project, its future will be controlled as directed by the Washington State Legislature.

e. Section 4.18.4 has been revised to reflect additional environmental analysis would be required for the Cross Base Highway project.

f. A detailed description of the Cross Base Highway project and its history is neither necessary nor appropriate for this Interstate 5 JBLM Vicinity Congestion Relief proposal.

COMMENT 25

Conservation Northwest
Keeping the Northwest Wild
1829 10th Ave W, Suite B
Seattle WA 98119
206.675.9747
www.conservationnw.org

November 16, 2016

Olympic Region
5720 Capitol Boulevard
Tumwater, WA

Dear John Wynands,

We are writing to submit comments on the I-5 - JBLM Vicinity Congestion Relief Project - Environmental Assessment. Our organization's mission is to protect, connect, and restore wildlife and their habitats from the Washington Coast to the BC Rockies. While I-5 lies within our mission area, our staff utilize the I-5 corridor to conduct our work, and we have programs aimed at working with your agency to increase the permeability of our state's highways in strategic locations for fish and wildlife - we typically would not comment and engage on a project within such a highly developed existing footprint with the focused purpose to "address existing and expected future deficiencies along I-5" to "Relieve congestion on I-5 within the vicinity of JBLM, Improve local and mainline system efficiency, Enhance mobility, Improve safety and operations, Increase transit and Transportation Demand Management (TDM) opportunities." But, components of your proposed Build Alternative include components of another proposed project that we strongly oppose and have standing litigation against that is currently under a Stay Agreement – SR 704 also known as the Cross Base Highway.

These components are the Thorne Lane Interchange and the Connector Road. In previous written comments to the Puget Sound Regional Council and meetings with your agency, we have stated that inclusion of these components in the final JBLM Vicinity Congestion Relief Project's Build Alternative would not trigger our lawsuit if they went through full environmental analysis and were shown to have value as stand-alone projects to improving the north-south flow of traffic on I-5 as well as being fully separated from SR-704 (Cross Base Highway). This Environmental Assessment (EA) does present these two components as independent projects to address north-south I-5 traffic flow improvements (and we will leave it to local experts and traffic analysts to comment on the merit of this presentation for solving I-5 traffic problems), but the EA and other WSDOT communications do not adequately separate these actions from the SR-704 project completely.

The EA states under cumulative effects that "The SR 704 Cross Base Highway Project is not considered among the reasonably foreseeable future projects because it is not included in a financially constrained plan. In 2004, FHWA completed NEPA and recorded a decision on the Cross Base Highway project to construct a six-mile-long limited access highway from I-5 to SR 7. In 2009, one project element was completed, the Spanaway Loop Road to SR 7. In 2014, SR 704 Cross Base Highway, I-5 to Spanaway Loop Rd, was listed as "Unprogrammed" with a completion date of 2035 by the Puget Sound Regional Council (Vision 2040)." (emphasis added). We appreciate and fully support the recognition that SR-704 is unfunded and is not an

COMMENT 25 (CONTINUED)

anticipated cumulative effect, but a stronger statement is necessary than the above to warrant no analysis in this EA.

Additionally the WSDOT project webpage for SR-704 Cross Base Highway was updated this month and states that "The SR 704 Cross-base Highway is divided into five independent projects. Construction on Project 1, Spanaway Loop Rd to SR 7, began in July 2008. The four remaining projects are suspended awaiting funding."

Under a cumulative impacts analysis your agency must disclose impacts for any reasonably foreseeable actions including those for which there are existing decisions, funding, formal proposals, or which are highly probable, based on known opportunities or trends. You cannot limit reasonably foreseeable future actions to those that are approved or funded. On the other hand, you are not required to speculate about future actions that are merely possible in nature but not probable based on information available to you. The direct effects in the effects analysis of the EA for other values such as transportation forecast out to 2040, which sets a temporal range of effects at least that far out for this analysis. Therefore your recognition of PSRC's Vision 2040 aims to construct SR704 Cross Base Highway by 2035, keeps this action within the temporal range of effects to be analyzed and therefore you need to demonstrate why although it has a signed decision and is within external plans it is reasonably foreseeable. This need to be clear on why SR704 Cross Base Highway is not a priority for the agency or a shovel ready project that meets existing transportation needs for our state to allow the I-5 JBLM Improvements to move forward without additional analysis tied to this controversial project with large effects, is an opportunity.

The statement in the EA and other WSDOT communications need to be expanded upon to display that SR-704 Cross Base Highway is not probable beyond just a lack of existing funding in hand for construction.

a. To that end we suggest the I-5 - JBLM Vicinity Congestion Relief Project - Environmental Assessment edit the statement in cumulative effects as follows: "The SR 704 Cross Base Highway Project is not considered among the reasonably foreseeable future projects because it is not a priority transportation project for this WSDOT region, additional environmental analysis would need to be conducted due to significant changed conditions and policies since the original NEPA, and it is not included in a financially constrained plan. In 2004, FHWA completed NEPA and recorded a decision on the Cross Base Highway project to construct a six-mile-long limited access highway from I-5 to SR 7. In 2009, one project element was completed, the Spanaway Loop Road to SR 7. In 2010, a lawsuit was filed by multiple parties challenging the ROD, EIS and ESA review for SR704 Cross Base Highway and a Stay Agreement was agreed to be all parties the same year that remains in place today. In 2014, SR 704 Cross Base Highway, I-5 to Spanaway Loop Rd, was listed as "Unprogrammed" with a completion date of 2035 by the Puget Sound Regional Council (Vision 2040). The overlapping components of this proposal with SR704 Cross Base Highway have independent utility to address the stated purpose and need laid out in this document, and are not intepretted by our agency as implementation of SR704 Cross Base Highway."

b. Outside the scope of this EA, we strongly suggest that you remove SR704 Cross Base Highway from your list of projects available for funding and recognize the Phase 1 implementation of this project as a stand-alone project with the independent value you state online that it "drastically improving safety and mobility" (including removal of the SR704 Cross Base Highway Signs).

WSDOT Response – Comment 25

a. The JBLM project meets a stand-alone need to address chronic peak period traffic congestion and improve mobility through the I-5 corridor. It does not facilitate the Cross Base Highway concept and as a result, does not violate the 2010 Motion for Stay.

b. WSDOT cannot unilaterally dismiss the Cross Base Highway project. As a regionally significant transportation project, its future will be controlled as directed by the Washington State Legislature. Section 4.18.4 (page 234) has been revised to reflect additional environmental analysis would be required for the Cross Base Highway.

COMMENT 25 (CONTINUED)

Some reasons why the SR704 Cross Base Highway should be removed from WSDOT's scope of work and projects available for funding include:

- Only 3% of our state's oak woodland prairies remain, and the Cross-Base Highway would destroy 162 acres and fragment 1,600 acres of habitat;
- In July 2013 Agriculture Secretary Tom Vilsack, Interior Secretary Sally Jewell and Defense Acting Deputy Under Secretary for Installations and Environment John Conger announced a federal, local and private collaboration that will preserve agricultural lands, assist with military readiness and restore and protect wildlife habitat through a National Sentinel Landscape Designation that includes investment of over $12 million to protect base, preserve environment recognizing "*Once covering 150,000 acres, only three percent of the original native prairie habitat remains due to development. Several of the at-risk species in this area include Taylor's checkerspot butterfly, the streaked horned lark, and the Mazama pocket gopher. A rare native plant, the golden Indian paintbrush, is already listed as "threatened" under the Endangered Species Act."* The Cross Base would contradict this new land designation, more information at http://www.usda.gov/wps/portal/usda/usdamediafb?contentid=2013/07/0142.xml&printable=true
- Pierce County's Biodiversity Network Assessment describes the wetlands, prairie, and oak savannah on the military bases as "the most biologically and ecologically rich areas remaining in the lower elevations of Pierce County." The County predicts that these diverse habitats support 20 state or federally listed species, 24 Priority Habitat and Species, and 10 at-risk species, and dozens of other plants and animals. https://www.piercecountywa.org/xml/services/home/property/pals/pdf/biodiversityreport.pdf
- In contradiction to the climate change goals adopted by our state and your agency as part of the Governors Climate Action Team, SR704 Cross Base Highway would increase miles traveled by individual drivers. In the words of the environmental impact statement for the project, "Overall, people would travel a little farther to use the new Cross-Base Highway project to avoid other congested highways and arterials; this would increase miles driven" (Cross-Base Highway FEIS, p. 4-201)." Also the Cross Base Highway's environmental assessment did not consider its contribution to greenhouse gasses into account, which would need to be analyzed now.

Although we appreciate SR704 Cross Base Highway is not programmed for funding and assumed as a reasonably foreseeable action, expanded language is needed to display that assumption clearly in this EA. We welcome continued dialogue outside the scope of this EA to find ways to keep Washington moving in the Pierce County region with projects that solve today's traffic problems, protect our state's valued and rare biodiversity, and contribute to our climate change goals which includes removing outdated past plans for SR704 Cross Base Highway.

Sincerely,

Jen Watkins
206.904.7914, jwatkins@conservationnw.org

COMMENT 26

Nisqually Indian Tribe
4820 She-Nah-Num Dr. S.E.
Olympia, WA 98513
(360) 456-5221

October 24, 2016

Jeff Sawyer
WSDOT
PO Box 47440
Olympia, WA 98504-7440

Dear Mr. Sawyer,

The Nisqually Indian Tribe thanks you for the opportunity to comment on:

Re: Interstate 5 JBLM Vicinity Congestion Relief EA

The Nisqually Indian Tribe has reviewed the report you provided for the above-named project. The Nisqually Indian Tribe has no further information or concerns at this time. Please keep me informed if there are any Inadvertent Discoveries of Archaeological Resources/Human Burials. Please continue to keep us informed of the progress of this project.

Sincerely,

Jackie Wall
THPO
Nisqually Indian Tribe
(360)456-5221 Ext. 2180
wall.jackie@nisqually-nsn.gov

WSDOT Response – Comment 26

The Nisqually Tribe is a key partner for this project. The project occurs within areas of tribal interest and ongoing coordination through cultural resource consultation is important. WSDOT looks forward to continued close coordination as the improvements are further developed and implemented.

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COMMENT 27

I-5 JBLM VICINITY CONGESTION RELIEF
PROJECT UPDATE AND PUBLIC HEARING

November 7, 2016

Lakewood, Washington

DIXIE CATTELL & ASSOCIATES
COURT REPORTERS & VIDEOCONFERENCING
(360) 352-2506

BE IT REMEMBERED that on Monday, November 7, 2016, at 4:00 p.m., at 4500 Steilacoom Blvd. SW, Lakewood, Washington, before REBECCA S. LINDAUER, Certified Court Reporter, the following proceedings were had, to wit:

27 MR. RON LUCAS: I would like to have my typed statement entered in the record.

"1. Steilacoom-DuPont Road presently serves as the primary bypass road whenever congestion occurs on northbound I-5 toward JBLM.

"2. Motorists whose destination is JBLM North, Lakewood, University Place, or even South Tacoma, simply get off the freeway, travel through Steilacoom, and on to their destination. By doing so, it only adds about 10 minutes to their trip versus staying on the freeway when traffic is good. Motorists are well aware of this alternative.

"3. The impact is felt primarily at the intersection of Steilacoom/DuPont Road, Union Avenue in town, where motorists attempting to avoid congestion intersect at the intersection of Union Avenue/Martin Street/Rainier Street. Our residents know whenever traffic is bad on I-5 simply by noting the increased traffic at this location.

"4. During the p.m. peak period, this can result in cars backing up on Rainier Street at the stop sign westbound well over four blocks, resulting in a Level of Service F

COMMENT 27 (CONTINUED)

condition and forcing motorists to dart out into traffic between small gaps in an attempt to gain access. Similarly, LOS conditions also decline at the intersection of Main Street/Rainier, four-way stop, in the center of town.

"Now, imagine this condition lasting consistently for four years, every day. Given the timelines for construction, overpasses and lane construction, outlined in the EA for this project, it is obvious, even under the best of conditions, congestion will be consistent and motorists whose destinations are in the locations cited will make this the standard way to get around the construction for up to four years, resulting in a significant adverse impact.

"We recognize this upcoming impact and request the assistance of FHWA and WSDOT to help mitigate this anticipated condition now before it impacts our residents on a daily basis.

"1. We have conducted a traffic study, at our own expense, to look at alternatives to moving traffic through this intersection safely.

"2. Based on this study and the engineer's recommendations, the town council has recommended adding a roundabout at this location.

"3. While we do not have the construction funds secured, we have completed a conceptual design, at our own expense, and stand ready to complete the engineering design

within six months of securing the construction funds.

"4. The conceptual design reveals we have sufficient right of way or can obtain any additional needed right-of-way from town-owned property. This makes the project feasible to construct quickly.

"We request the EA for this project recognize this previously overlooked impact and include the construction of a roundabout at this location, funded through a partnership by/between the town of Steilacoom and FHWA/WSDOT. While we recognize the long-range benefits of the completion of the JBLM/I-5 Corridor Project and support the completion of those improvements, we must recognize the impacts this project will have on the town of Steilacoom throughout the four-year construction period.

"Hope this is helpful. We will follow up with a letter to this effect before the comment deadline of 11/22/16.

"Thanks Mayor! Mark."

MS. DEBRA FLYNN: I use this every day. I get off -- I get on the freeway in the morning. I go south and I have no traffic. It's all going north, so I feel like this road is going the wrong way. It really should be going north, not south. And I don't want to see the long-term impact, which loss of trees, architecture sound walls. That's about it. Those are the things -- I don't think it would be useful for me, and I use it every day. I go down

WSDOT Response – Comment 27

We understand the concern that residents of Steilacoom have with existing traffic congestion on Union Avenue, particularly at the intersection with Martin/Rainier Street. This location is impacted not only by local traffic, but also by traffic destined for the ferry terminal and, periodically, by drivers that choose to use local streets instead of I-5.

One of the regional challenges as traffic demand exceeds the capacity of the overall transportation system is the shifting of traffic patterns between local and county roads, state highways and interstate highways. Study of traffic demand on I-5 through JBLM identified that a key element of that demand is drivers making local (short distance) trips on the interstate highway. When I-5 becomes congested, some drivers making short trips shift to using local and county roads. As described in your letter, this is an existing condition in Steilacoom.

During construction of the project, we intend to keep the existing number of lanes on I-5 open to traffic between 5:00 a.m. and 8:00 p.m. on weekdays. We intend to apply standard restrictions on when lanes can be temporarily closed to allow construction activities. Temporary lane closures will be permitted between 8:00 p.m. and 5:00 a.m. We do not expect any detours routing traffic from I-5 onto local streets. The exception to this is at the Thorne Lane (Exit 123) and Berkeley Street (Exit 122) interchanges where temporary closures of ramps are necessary that will affect traffic patterns on local roads in Tillicum.

Maintaining traffic flow on I-5 during construction will be a high priority of the project. We have no reason to expect that any direct action of the I-5 improvement project through JBLM will detour traffic onto local streets in Steilacoom. Improving roads and intersections in Steilacoom is outside the scope of the I-5, JBLM Vicinity Congestion Relief Project.

As part of the I-5 widening project, a Transportation Management Plan (TMP) will be implemented. The TMP will address mobility and safety through the construction zone. Stakeholders have been invited to participate in the development of the TMP. During the Design-Build construct, the TMP will guide public information strategies as well as opportunities for stakeholder involvement in traffic management as the project evolves.

COMMENT 28

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to Berkeley. I go from Gravelly to Berkeley and from Berkeley to Gravelly home. So it's right in my path.

MR. NORMAN JAY COOK: Leaving Gravelly Lake exit going south on I-5, need the right lane -- right lane exits back towards Gravelly Lake, right near North Thorne Lane and it congestions up. The people, they want to get over just before you get to Thorne Lane.

The traffic lights in Tillicum are set for the morning going into Log Center and Madigan, and you can't get out in the afternoon. There would be nothing coming and no -- it won't change. You sit and sit and sit.

MR. STEVE COLEMAN: I live on North Thorne Lane, and this is very close to the 123 proposed interchange. One of the concerns right now is that there's a bunch of property that you're going to be buying to build this interchange, and it's currently infested with homeless people and all their garbage. It's filthy. Nobody can do anything about it. And I'm concerned that once WSDOT buys the property, will they be cleaning this up and making sure that these illegal people are not allowed to live there.

And I talked to one of the people about the wetland impact, and they said that the new ramp that goes up over the railroad tracks cannot be built with -- by piling up dirt because of the wetland, so it will be up on stilts, making it very much like The Jungle, if you're aware of that

WSDOT Response – Comment 28

The predicted southbound vehicle volume on the Gravelly-Thorne Connector during the morning peak hours is, indeed, relatively low. However, the predicted demand for a southbound connection increases significantly in the afternoon peak hours. In addition, providing the proposed southbound connection offers a direct path for emergency responders into Tillicum regardless of the congestion situation on the mainline.

The proposed Build Alternative provides an extra (or, "auxiliary") mainline lane for northbound vehicles in this area to address the problem noted.

COMMENT 29

I-5 JBLM OPEN HOUSE
, 11/07/2016

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Dixie Cattell & Associates * (360) 352-2506
Court Reporters & Videoconferencing
Page 5

WSDOT Response – Comment 29

Southbound I-5 in the project area currently loses its outside lane at the Thorne Lane interchange, resulting in heavy congestion as vehicles merging left into the remaining three lanes are joined by additional southbound traffic getting on the freeway from Thorne Lane southward. The proposed project will add through lane capacity in the southbound direction all the way to Center Drive, which will improve near-term traffic operations north of Main Gate.

Additionally, the project will improve existing traffic operations at the I-5/Thorne Lane interchange with the addition of a roundabout. Replacement of the existing signal with roundabouts at Thorne Lane will allow traffic to keep moving instead of waiting at red lights.

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COMMENT 30

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in Seattle, where the freeway's above the ground and it's a magnet for homeless people to live because it's a great roof that keeps them dry year-round. I'm really very concerned that would be the case here. You're building a great house for all of these multiple homeless people.

And the second issue is with the water outfall that comes from the other side of the freeway, from the McChord side. The water -- this is rain runoff that goes under the freeway and then on the west side it goes through a ditch up to where my house is, [redacted]. From there, it goes into a culvert. And the mouth of that culvert is -- gets blocked sometimes causing flooding. I would just like to be -- for them to be aware that flooding is possible and that it should be addressed as they're in the design stage. That's it.

MS. DONNA FELDMAN RABISA: I just said this. Maybe I should be writing it down. Richard Rabisa was -- worked with Mike Harold to rename the Berkeley Street Bridge Freedom Bridge, so the sign was changed and everything. It says Freedom Bridge and it's my request, and I know it's his hope, that when the new interchange comes at Berkeley Street, that it -- somewhere that new bridge retains the name Freedom Bridge because it has -- just means a lot because of the military base there. Just wanted to keep it alive so it doesn't go away because it's -- yeah.

WSDOT Response – Comment 30

A) We appreciate your comment and concern about current and potential homeless encampments in the vicinity of the proposed Thorne Lane Interchange. Homeless encampments on public property has become a priority issue in Washington State. Preventing encampments from forming under newly constructed bridges is a priority for WSDOT. Minimizing the opportunity for homeless encampments will be addressed as the design is developed further.

B) A downstream analysis to check that project improvements do not increase flows downstream to this culvert will be conducted as part of the final design of the project. The culvert will likely remain in place because the roadway improvements will be minor in the vicinity of the culvert. The culvert is owned and maintained by the City of Lakewood and the property owner should contact the city should maintenance be needed.

COMMENT 31

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C E R T I F I C A T E

I, REBECCA S. LINDAUER, a Certified Court Reporter in and for the State of Washington, residing at Lacey, do hereby certify:

That the foregoing statements were taken before me and completed on the 7th day of November, 2016, and thereafter transcribed by me by means of computer-aided transcription; that the statements are a full, true, and complete transcript of the testimony of said witnesses;

That I am not a relative, employee, attorney, or counsel of any party to this action or relative or employee of any such attorney or counsel, and I am not financially interested in the said action or the outcome thereof;

That I am herewith securely sealing the statements promptly mailing the same to MR. JEFF SAWYER.

IN WITNESS HEREOF, I have hereunto set my hand this 10th day of November, 2016.

Rebecca S. Lindauer, CSR#2402
Certified Court Reporter, in and for the State of Washington, residing at Lacey.

WSDOT Response – Comment 31

The Berkeley Street Bridge was designated the Freedom Bridge in 2006 by the Transportation Commission through Resolution 679. The new replacement bridge to be constructed will retain the designation and signing of "Freedom Bridge" in accordance with Transportation Commission Policy and Procedures.

COMMENT 32

From: [redacted]
Sent: Tuesday, November 22, 2016 8:02 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/22/2016 8:02:27 PM

======My Contact information======
Name: Tyler Sorrell
E-mail: [redacted]
Phone:
Street Address:
City: Bonney Lake
State: WA
Zip Code: 98391

===== My Question/Comment/Complaint =====

This comment pertains specifically to section 4.7 (water resources). My first thought before even reading it was stormwater runoff and the inevitable increase associated with creating more impervious surfaces. This was addressed in section 4.7.4 in which the plan calls for the construction of new stormwater treatment areas. I think it's great that the plan will create enough treatment areas to mitigate nearly double the acreage of impervious surface that the expansion project is going to add. This built in redundancy is good ecologically and should help ease concerns of others like myself.

It's also good to see that groundwater quality has received due consideration for protection. I agree with the proposed sealing of wells within the footprint of the build alternative to prevent pollutants from leaching into the groundwater. What I did not see addressed was how the project would specifically manage for the special consideration areas that were briefly mentioned in section 4.7.2. It was stated that these areas would require special attention to keep levels of TCE and other halogenated organics in check but how this would be achieved was not discussed. Project managers may want to look into how to best manage and monitor these areas before starting construction.

WSDOT Response – Comment 32

The JBLM Logistics Center Pump & Treat (P & T) System, operated to control and treat the TCE plume, is expected to continue operation during construction of the I-5 JBLM Vicinity Congestion Relief Project. The operational features of the P & T System will not be encroached upon by construction or finished features related to the project. Infiltration galleries associated with the system are near the Project boundary. Based on the design completed for the NEPA phase, the proposed Project does not appear to affect the existing P&T System. However, as stated in the I-5 JBLM Vicinity Congestion Relief Project Groundwater Technical Memorandum dated June 7, 2016, if Project-related construction intercepts the groundwater table in this area or encroaches on the existing P&T System, a more thorough hydrogeologic assessment may be required. Special attention should be given to ensure that the P & T System continues to operate properly. No additional methods for managing the TCE plume are planned at this time. Additional information can be found in the I-5 JBLM Vicinity Congestion Relief Project Groundwater Technical Memorandum.

COMMENT 33

From: Julie Rodwell [redacted]
Sent: Friday, November 04, 2016 12:42 PM
To: Elliott, Bill
Subject: Looking for more info re JBLM project

I am a retired transportation policy manager and analyst with 44+ years of experience.

Re the materials for Monday's EIS meeting. Having trouble finding the analysis relating to "Institute flex time on JBLM".

Given that the base will begin to shrink again as the wars wrap up, it seems that this major option has been dismissed without discussion. Instead we are looking at half a billion dollars of capital construction that will be likely still be in progress well after the need has shrunk. Boeing in Everett, Renton and Seattle has been using staggered work hours for decades (15 minute intervals) and was the originator of Metro Seattle's vanpool program (the largest in the nation).

USDOT was the architect of the TSM approach in the 1970s and surely USDOT today would support this option. It is not acceptable to dismiss it with no discussion!

If I am missing something, please provide the link to the analysis report of the TSM options.

Julie F. Rodwell
360-491-6354

WSDOT Response – Comment 33

The institution of flex-time for JBLM employees was considered during the original evaluation of multimodal alternatives conducted in 2014. It was acknowledged at that time that this measure is not under the control of state or local governments. JBLM currently operates an extensive Commute Trip Reduction program, and expansion of this program has been encouraged where feasible. JBLM's civilian employees currently have opportunities for flex-time.

COMMENT 34

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ENVIRONMENTAL REVIEW
AND ASSESSMENT

November 28, 2016

Mr. Dean Moberg, PE
Federal Highway Administration
711 South Capitol Way, Suite 501
Olympia, Washington 98501

Mr. Jeff Sawyer
Washington Department of Transportation
Olympic Region
P.O. Box 47440
Olympia, WA 98504-7440

Dear Mr. Moberg and Mr. Sawyer:

The U.S. Environmental Protection Agency has reviewed the I-5 JBLM Vicinity Congestion Relief Project Environmental Assessment. (EPA Region 10 Project Number 15-0036-FHW). We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We appreciate the opportunity to review and comment on the proposed action.

The full project area is in southern Pierce County along the west boundary of the main portion of Joint Base Lewis McChord. It spans the length of JBLM from DuPont north to the Gravelly Lake Drive interchange north of the Tillicum and Woodbrook communities. Altogether it would widen 8 miles of Interstate 5, expand and rebuild 5 interchanges, construct a Gravelly-Thorne Connector Road, and establish a bike-pedestrian path west of and adjacent to I-5 along portions of the project corridor. Because decisions by JBLM affecting the southern portion of the study area are expected to be determined in early 2017, FHWA and WSDOT have divided the study area into northern and southern portions in order to proceed with the north segment. The North Study Area is located between Gravelly Lake Drive (exit 124) and Center Drive (Exit 118). The South Study Area is between Steilacoom-DuPont Road (Exit 119) and Mounts Road (Exit 116). The EA evaluates the No Action Alternative and one Build Alternative.

The proposed action in the North Study Area is to construct an additional northbound and southbound travel lane on I-5 between Thorne Lane and Steilacoom-DuPont Road. New auxiliary lanes would be constructed northbound between Berkeley Street and Thorne Lane interchanges and between Thorne Lane and Gravelly Lake Drive interchanges. Both the Thorne Lane and Berkeley Street (Exit 122) interchanges would be rebuilt to accommodate the additional I-5 lanes, however, the Thorne Lane Interchange would be relocated southward, and both Thorne Lane and Berkeley interchanges would be substantially enlarged and reconfigured. A new local road connecting Gravelly Lake Drive and Thorne Lane, and a shared use pedestrian-bike path along I-5 would also be constructed. Acquisition of additional right-of-way would be necessary to complete the proposed project.

COMMENT 34 (CONTINUED)

We agree with the purpose and need of the project, to reduce traffic congestion and improve person and freight mobility on and near I-5 in this area. However, we have a number of concerns regarding the EA. In our scoping letter of June 22, 2015,[1] we identified a range of issues applicable to this project and noted their potential for significance. If this Environmental Assessment process results in a conclusion that the proposed project may cause significant environmental impacts, then either an environmental impact statement must be prepared or commitments to mitigate impacts must be included in a finding of no significant impact (FONSI).[2]

a. Segmentation

Because the project has been divided into north and south segments, and information on the south segment is limited, it is not possible to fully analyze the entire suite and significance of potential impacts, nor to ascertain best alternatives for the corridor as a whole. We agree with the public's observation[3] that an optimal corridor strategy would "…take a holistic look at making the system operate more efficiently, including more than just the addition of lanes to improve overall reliability and capacity in the corridor." Additionally, the traffic analysis does not include all applicable Sound Transit improvements that are reasonably foreseeable.

Recommendation: Revise the NEPA document to articulate combined impacts of the entire corridor project and the significance of those combined impacts. Incorporate the applicable Sound Transit 2 and ST3 projects as well as other reasonably foreseeable transit and other local improvements in the 2020 and 2040 analyses for the full corridor.

b. Alternatives

The EA analyzes only one Build Alternative. While modeled projections of travel time are inconsistent in the EA (Transportation Section vs. Chapter 5), they generally agree that the proposed action provides modest northbound travel time improvement, and little or no southbound travel time benefit.[4] We believe analyses of an expanded range of reasonable alternatives would provide a better opportunity to compare options for reducing congestion and diversifying the transportation system.

We note that the Build Alternative includes two elements that are also portions of the proposed and partially built Cross Base Highway: the Thorne Lane Interchange and the Gravelly-Thorne Connector. The EA does not acknowledge this. The EA states:

> The SR 704 Cross Base Highway Project is not considered among the reasonably foreseeable future projects because it is not included in a financially constrained plan. In 2004, FHWA completed NEPA and recorded a decision on the Cross Base Highway project to construct a six-mile-long limited access highway from I-5 to SR 7. In 2009, one project element was completed, the Spanaway Loop Road to SR 7. In 2014, SR 704 Cross Base Highway, I-5 to Spanaway Loop

[1] June 22, 2015
[2] January 14, 2011 CEQ Memo, *Appropriate Use of Mitigation and Monitoring and Clarifying the Appropriate Use of Mitigated Findings of No Significant Impact*
[3] EA p. 374
[4] One outcome predicts approximately 13 minutes time savings northbound and about 4 minutes southbound. PSRC modeling (p. 241) for 2020 shows that southbound PM peak period speeds are below 40 mph (LOS F) with either the No Build or Build Alternative. 2040 PM peak period speeds southbound are below 15 mph with either the No Build or Build Alternative.

WSDOT Response – Comment 34

a. Segmentation

The process of both tiering and phasing projects does not mean the project has been segmented for environmental review. Rather, as noted in Chapter 1, NEPA review is being conducted with a tiered approach. Due to the complexity of managing congestion relief improvements for this lengthy corridor FHWA and WSDOT have determined a tiered approach to environmental review under NEPA is appropriate. This tiered approach ensures both project specific and corridor level issues that are ripe for evaluation and consideration are addressed at each tier. Tier 1, or corridor level analysis, has been conducted for the entire corridor and is presented in this Environmental Assessment (EA). Tier 1 analysis included multi modal analysis and local street options during the planning phase as noted in Chapter 3.3.

Tier 2, or project specific analysis, has been completed for the North Study Area (NSA) and is presented in this EA, with Tier 2 analysis for the South Study Area to be conducted in the future as project specific details are developed. The NSA is the first of two construction phases, but this does not equate with a segmented project where the "other project" may not be built. FHWA and WSDOT have determined the build proposal for

COMMENT 34 (CONTINUED)

Rd, was listed as "Unprogrammed" with a completion date of 2035 by the Puget Sound Regional Council (Vision 2040).[5]

While the full project is listed as "Unprogrammed" and is presently unfunded, that status could change. The project appears to be reasonably foreseeable given the recorded decision under NEPA, the completion of one element, the proposed completion of two more elements, a projected completion date, and an active WSDOT Cross Base Highway project web site. The Thorne Lane Interchange is the designed western terminus of the Cross Base Highway and, in order to connect with the South A alternative chosen for that project, would need to be enlarged, redesigned, and moved southward. The siting and design for the interchange described in the I-5 JBLM EA would achieve these objectives. The Gravelly-Thorne Connector road, which was the subject of a Supplemental EIS for the Cross Base Highway in 2002, is a requirement for building the Cross Base Highway. It was required by FHWA due to the additional traffic and congestion effects on I-5 that would result from the Cross Base Highway. The Thorne Lane interchange and the Gravelly-Thorne Connector are designed according to the same specifications needed for the Cross Base Highway, both are requirements of the project, and the WSDOT website for Cross Base Highway indicates that "The SR 704 Cross-base Highway is divided into five independent projects. Construction of Project 1, Spanaway Loop Rd to SR 7, began in July 2008. The four remaining projects are suspended awaiting funding."

The EPA and other resource agencies expressed serious concerns about potential impacts of the proposed Cross Base Highway and the adequacy of the NEPA analysis of the project, including a lack of alternatives, and the lack of viable and adequate mitigation for impacts to threatened species and rare habitats on JBLM lands. The NEPA Environmental Impact Statement for the Cross Base Highway is now outdated. A Supplemental EIS for the full project would be needed prior to constructing any additional segments of the project.

c. Gravelly-Thorne Connector. Of the 181 Travel Demand Modeling (TDM)/multimodal concepts, only the Gravelly-Thorne Connector and bike/ped path are advanced in the EA. Based on modelled outcomes for 2020, the Gravelly-Thorne Connector shows no substantial benefit.[6] Traffic using this new one-lane southbound road ranges from 25 vehicles (AM peak hour) to 75 vehicles (PM peak). In 2040, projected traffic is 40 vehicles (AM peak) and 240 vehicles (PM peak). The EA offers no explanation for the increase in 2040 PM peak usage. The EA traffic analysis should explain the reason for this increase in projected use, particularly when the I-5 project assumes design only for I-5 and local traffic. In addition to its low level of effectiveness for relieving I-5 congestion, the one-lane southbound-only Gravelly-Thorne Connector construction and operation could cause increased environmental, health and safety impacts to the Tillicum neighborhood. Increased air pollution, noise, construction traffic, and new cut-through traffic on current dead-end residential streets would create new and increased health and safety hazards for vulnerable residents and add to the cumulative stressors these residents currently experience.

Recommendations:

- Include in the NEPA document acknowledgement that the Thorne Lane Interchange and the Gravelly-Thorne Connector are also elements of the proposed Cross Base Highway.
- Include the Cross Base Highway on the list of reasonably foreseeable future projects.

[5] EA p. 230
[6] EA p. 78

WSDOT Response – Comment 34

the North Study Area does not predispose design alternatives for the South Study Area. The South Study Area's (SSA) environmental impacts can only be fully assessed as project level design details are developed, although cumulative impacts as known from the SSA have been evaluated in the NEPA document.

b. Alternatives

As noted in Chapter 3, FHWA and WSDOT considered numerous alternatives in defining the proposal. An expanded range of congestion relief options including modal analysis and local road network components were included in the Planning phase. Extensive community outreach and engineering analysis defined a wide range of alternative approaches. The range of alternatives considered for congestion relief in the project corridor, including TDM, multimodal, and local roads, and the screening criteria used to evaluate the options are discussed fully in the following documents:

- January 2014 I-5 JBLM Congestion Relief Study – Corridor Feasibility Study
- August 2014 I-5 JBLM Congestion Relief Study Phase 2A – Alternative Analysis Development and Screening of Multimodal Options
- March 2015 I-5 JBLM Congestion Relief Study, Phase 2 – Multimodal Alternatives Analysis

COMMENT 34 (CONTINUED)

- Provide a range of reasonable alternatives for the I-5 mainline and the TDM/Multimodal/local roads components. Include a listing of the concepts/potential alternatives for the TDM/Multimodal/local roadways solutions.
- Select and analyze a range of reasonable TDM/multimodal/local roads alternatives in the NEPA document that would contribute to JBLM congestion relief and improve livability for disadvantaged communities in the project area.
- Disclose the screening criteria used to evaluate the proposals. Compare and contrast the alternatives with respect to the screening criteria and the social, economic, and environmental consequences.
- Consider safer, less impactful alternatives for enhancing community connectivity and livability.[7]

d. TDM/Multimodal components. We support inclusion of the bicycle/pedestrian path to provide a non-motorized travel alternative. In light of the high disproportionate adverse environmental justice impacts of the proposed project, the path would have potential benefits to all users, particularly residents that do not own a car, school children, elderly, and potentially the disabled. However, no bike/ped facility would be provided in the Tillicum neighborhood, which is most impacted by the proposed project. Residents would have to use local streets affected by increased project-induced traffic, to access the path north or south.

Recommendations: Rather than relying upon local streets, construct a dedicated bike/ped path within the Tillicum neighborhood that is continuous with new proposed segments north and south to mitigate safety and health hazards to children, elderly, the disabled, and other Tillicum residents. Locate the bike/ped path at sufficient distance from the I-5 right-of-way and traffic to substantially reduce near-roadway exposure to vehicular emissions. We recommend that the bike/ped path be constructed whether or not a Gravelly-Thorne Connector Road is built.

e. Environmental Justice

The EA needs to provide additional analysis and disclosure of the current stressors and baseline health conditions of the affected, vulnerable and disadvantaged populations surrounding the project area. In that context, the projects' direct, indirect, and cumulative impacts should be analyzed, disclosed and mitigated. For example, the location of numerous schools in the I-5 corridor and the large numbers of low income and minority children in the area suggest potentially high asthma rates and the projected years of heavy construction close to schools and residences add to current and future operational impacts. We are particularly concerned about the conclusion in the EA (p. 236) that "operations of the Build Alternative would not contribute to adverse cumulative impacts and no mitigation would be necessary."

The EA should include additional information about displacement. For example, to adequately assess impacts on community members displaced by the project, it would be helpful to have information more specific than the number of households impacted. This would include the total number of people displaced, including children, ages and other demographic information such as race, income level, language and length of time living at that address. Residential displacement entails other types of displacement such as potential loss or changes of family health care, employment, and social

[7] For the I-90 and SR 520 bridge projects, park-like 'lids' were constructed over the freeway to retain and enhance community connectivity, aesthetics, and open space.

WSDOT Response – Comment 34

Through detailed engineering and traffic analyses disclosed in the above documents, FHWA and WSDOT concluded the most reasonable congestion relief solution would be to add to add an additional managed lane to the existing facility.

While the proposed program of improvements includes reconstruction of the existing Thorne Lane interchange and construction of new Gravelly Lake Boulevard to Thorne off system capacity, these elements have independent utility to serve the project purpose of providing congestion relief on Interstate 5. Thorne Lane interchange reconstruction is necessary to accommodate the proposed added lane width on Interstate 5. Reconfiguring the interchange in accordance with current design standards and to provide necessary grade separation from the adjacent rail line results in some similar features to the Cross Base Highway interchange proposal. Gravelly-Thorne connector improvements are proposed to reduce mainline traffic demand generated by short trips, an identified congestion relief strategy for Interstate 5 noted in Chapter 4.

The SR 704 Cross Base Highway proposal is not part of the Interstate 5 congestion relief program of improvements. It is not reasonably foreseeable for the several reasons EPA notes. The lack of foreseeable funding in any reasonable horizon, the fact Cross Base Highway is not within a fiscally

COMMENT 34 (CONTINUED)

services. While those relationships, jobs and services would likely be replaced in resettlement locations, they do represent tangible and intangible losses important to understand in assessing the project's social and cultural impacts.

The EA needs to include justification for defining the impact area as .5 miles on either side of I-5. It is reasonable to expect that construction of a project this size on a thoroughfare such as I-5 would have impacts beyond .5 miles on either side. Though the proposed work is sited at and proximate to the interstate itself, the potential impact zone should be extended to provide a more comprehensive view of potential impacts. For example, an analysis using EJSCREEN[8] with a 1-mile buffer on either side of I-5 in the project area, shows that there are approximately 17 schools within the project area. This differs substantially from the .5-mile assessment in the EA.[9] This suggests that there may be impacts on children, low income, and minority populations that are not accounted for in the EA. Another example is the anticipated redirection of traffic into the community at points during the construction. It is unclear whether such redirection would be exclusively within the .5 buffer of expected impacts.

Recommendation: For purposes of analysis, extend the project corridor to 1 mile on either side of the impact areas and characterize all applicable direct, indirect, and cumulative impacts to populations within the expanded analysis area. Include in the analysis the additional information discussed above.

f. Air.

We are concerned that the proposed project would potentially increase vehicular air pollution exposure levels for vulnerable populations. Using the Thorne Lane, Gravelly Lake, and Berkeley Avenue ramps as worst case scenarios, the EA air quality analysis shows that carbon monoxide concentrations would be worse with the 2020 Build Alternative than with the 2020 No Build Alternative at both Berkeley Avenue and Thorne Lane. At Thorne Lane, the 2020 Build Alternative would be worse than existing CO levels. Similarly, the Mobile Source Air Toxics emissions would be higher for the Build than for the No Build Alternative due to an expected increase in Vehicle Miles of Travel (VMT).[10] Vulnerable and disadvantaged communities may experience heightened exposure and inhalation levels from project construction as well as operation, which may lead to cumulative health effects from air pollution and other stressors.

Recommendations:

- Identify sensitive receptor locations and populations and evaluate near roadway pollutant levels. Include the proposed bike/ped path, schools, medical facilities, child and senior care centers, outdoor recreation areas, and affected business and residential areas.
- Include project-related air pollution (criteria pollutants and MSATs) in the cumulative health and safety effects analysis for affected low income, minority, senior, disabled, and children populations.

g. Public Engagement.

The EA needs to provide additional information to describe the extent and effectiveness of public engagement. It would be helpful to know the numbers of people attending the information sessions held and some of the demographic characteristics (e.g., race, gender, age classification) of those who attended. The EA states that most people were able to speak English, but it should disclose whether

[8] https://www.epa.gov/ejscreen
[9] EA p. 197
[10] EA p. 87

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constrained transportation improvement plan, the lack of an actionable NEPA Record of Decision (ROD), and the fact that the NEPA ROD is stayed in Washington's Western District U.S. District Court, all make the Cross Base Highway not a reasonably foreseeable project. If the Cross Base Highway does go forward in the future, it would require a new NEPA document.

The program of improvements associated with the Interstate 5 JBLM Congestion Relief proposal are fully independent from the Cross Base Highway proposal, which has for all intents and pusposes been eliminated. Accordingly, any outstanding environmental concerns related to the Cross Base Highway are not relevant for discussion and have no bearing upon the Interstate 5 congestion relief proposal.

c. Gravelly-Thorne Connector (GTC)

The Gravelly-Thorne Connector (GTC) serves an important health and safety function, is a priority of the City of Lakewood, and provides local short trip relief to I-5. The GTC will provide local street access to the landlocked Tillicum neighborhood (currently access is only available via the freeway), offer bicycle and pedestrian facilities to connect the area to the City of Lakewood, and provide an alternative route for emergency response vehicles otherwise totally dependent on I-5 for access to

COMMENT 34 (CONTINUED)

there were any requests for translation. The public outreach section should also convey whether or not community members were part of the outreach effort, whether agency outreach staff were diverse, and whether the communities provided feedback on the effectiveness of the outreach. We appreciate that the EA provided some indication of community reactions to the proposed project, such as their concern regarding cut-through traffic. The environmental justice section should convey more detail about how the community expressed support or opposition to other aspects of the project. We are aware that there were notable objections to the Thorne-Gravelly Connector Road at the September 2015 Open House. The EA should include a discussion of the issues that were raised, how they have been addressed, and whether or not they have been resolved. Additionally, if evaluation forms were distributed and collected at the conclusion of public meetings, we recommend this information be provided in the NEPA document or on the project website with an appropriate link.

Recommendation: Provide the information and mitigation discussed above in the NEPA analysis and decision document.

h. Noise. We are concerned that the Build Alternative would increase the current number of locations exceeding the FHWA Noise Abatement criteria (66 dBA) from 132 to 140. The EA states that only 42 sites would be mitigated with noise walls, leaving 98 sites impacted. We believe that noise mitigation, such as noise walls, insulation, or other remedies are justified to reduce the high disproportionate adverse impacts to project area residents.

Recommendation: Provide noise walls or other noise reduction mitigation for all affected locations to reduce the cumulative stressors to health and quality of life experienced by project area neighborhoods.

i. **Air quality**
While the EA states that the project area meets the criteria pollutant values for a project of air quality concern[11] it does not address what the elevated pollutant levels would mean with respect to human exposure and health effects. The analysis does not identify sensitive receptor locations and populations that would be exposed to emissions from project construction and operation, nor does it evaluate near roadway effects from vehicular emissions. For example, bike/ped travelers using the proposed bike/ped path along I-5 and the interchanges and overpasses may be exposed to elevated levels of air pollutants throughout the corridor.

Recommendations:

- Locate and design the proposed bike/ped trail to minimize near roadway exposure and health effects from vehicular air pollution.
- Disclose all construction mitigation measures for controlling air pollutants. Use water, rather than oils or chemicals, to control dust. Expand the construction mitigation measures to include all possible means to avoid and minimize air toxics and diesel emissions and exposures to workers, residents, businesses, and travelers. For additional information regarding construction mitigation measures, contact Karl Pepple in our Air Office at 206-553-1778.

[11] EA p. 85: greater than 125,000 annual average daily traffic and 8% or more of such AADT is diesel truck traffic, i.e., 10,000 diesel trucks.

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Tillicum during a major incident or emergency on I-5. Establishment of non I-5 routes into Tillicum is a priority for the City of Lakewood. Land Use goal LU-52 of the Lakewood Comprehensive Plan states "improve the quality of life for residents in Tillicum" and land use goal 52.4 states "seek a method of providing alternate connection between Tillicum and the northern part of the City besides I-5." These adopted goals reflect the community's priority on establishing better connections to the Tillicum neighborhood that are accomplished via the GTC.

Traffic volumes on the GTC are forecast to be low because travel model output on any given roadway is largely based on assumed speeds. The model interprets the 35 mph assumed speed on GTC as less desirable than the 60 mph on I-5, so little traffic is shown using the GTC. However, it should be noted that many drivers do not make routing decisions solely on the basis of speed. Depending on the location of each trip origin and/or destination, a driver may find it more desirable to use the GTC in lieu of I-5. This could result in actual volumes greater than the model predicted. This could be particularly true on days when congestion is heavier than the norm. The increase in forecasted PM peak hour traffic between 2020 and 2040 is largely related to increasing congestion on I-5 and the length of the

COMMENT 34 (CONTINUED)

j. Greenhouse Gas Emissions and Climate Change

The EA does not analyze the GHGs that would result from the proposed action's direct, indirect, and cumulative effects or discuss the extent to which the project would contribute to the State's GHG reduction goals. There are actions listed in the EA[12] that WSDOT could take to reduce GHGs (e.g., expanding transit, and increasing vegetation density over pre-project conditions to sequester carbon). However, the project has not adopted these actions.

Recommendations:

- Analyze the GHGs that would result from the proposed project for the full corridor in accordance with the August 1, 2016 Final CEQ Guidance on Consideration of GHGs and the Effects of Climate Change in NEPA Reviews.[13] Ensure that the analysis includes the direct, indirect, and cumulative effects from local and regional travel and land use change that would be facilitated, induced, and/or accelerated by adding capacity to I-5. This analysis should include the effects of all reasonably foreseeable projects.[14] Disclose how these transportation-related GHGs affect the State's ability to achieve its GHG reduction goals.
- Work with current transit providers to provide additional service in the project corridor. One additional bus trip during peak travel periods could easily surpass the number of cars removed from I-5 by the proposed Gravelly-Thorne Connector road.
- Roadside vegetation restoration plans should increase cover and density over pre-project conditions. Removal of trees and other vegetation from affected communities should be mitigated by replanting in acceptable locations.

k. Geology, Soils, Groundwater, and Hazardous Materials

Environmental cleanup activities under Superfund in the area include treatment of groundwater. A plume of contaminated groundwater underlies the Tillicum community and JBLM in areas that would also be the location of project construction.[15] The EA states that project area locations of seismic-related instability include the Thorne Lane interchange area and the vicinity of Murray Creek (p. 110). The soils and geology in these areas are described as:

- Having soft or weak foundation soils that could lead to global instability;
- Liquefiable soils;
- Subject to long-term settlement following placement of new fill.

The Murray Creek vicinity is also a potential erosion hazard area. The EA offers no alternative locations for the Thorne Lane interchange. Given the potential hazards, it would be prudent to examine alternatives for the location and design of this interchange.

Recommendations:

- Prior to issuing a NEPA decision document, consult with appropriate JBLM Public Works staff and, as needed, with EPA hydrogeology and Superfund staff regarding project area Superfund sites, contaminated groundwater aquifers, construction and groundwater protection plans to ensure the integrity of site remedies and to prevent further contamination of groundwater, wells,

[12] EA p. 89
[13] https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance
[14] Consider vicinities of Bonney Lake, Orting, and unincorporated areas of Pierce County.
[15] EA Figure 4.7-2, page 121)

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traffic queue that is expected to back up from the southbound Center Drive lane drop.

It is not anticipated that the GTC would generally increase traffic volumes through the Tillicum neighborhood. Rather, it is expected that drivers on the future GTC are already destined to the neighborhood.

d. TDM/Multimodal Components

There are existing bicycle and pedestrian facilities available to the public in Tillicum. Due to the secure military facility and the Sound Transit railroad right-of-way, there is no pedestrian facility within other portions of the I-5 corridor through JBLM, and bicyclists must use the shoulder on I-5. Building a dedicated shared use path in Tillicum would require the purchase of residential and/or commercial properties. All the alternatives evaluated for the GTC include a bicycle/pedestrian path.

e. Environmental Justice

The EA discloses the potential for disproportionate impacts to environmental justice populations, see page 206. WSDOT has fully committed to work with the community and individuals adversely affected. WSDOT will mitigate direct impacts through the relocation process. The detailed interviews that accompany that process will

COMMENT 34 (CONTINUED)

surface water, soils, and human exposure.[16] Disclose in the NEPA document the potential for spreading contaminants to groundwater or other media, the potential risks to resources (e.g., drinking water supplies, air quality, soils, vegetation, wildlife, and human health), particularly for the communities and species that overlie and/or are in close proximity to the areas of contamination, and the mitigation measures that would be necessary to ensure that project construction, operations, and maintenance maintain the integrity of site remedies.

- Explore and evaluate alternative locations, alignments, and design for the Thorne Lane interchange in the NEPA document.

l. Wetlands, native oak vegetation

We are concerned about potential impacts of the project to wetlands. As stated in our scoping comments, due to their rarity in the landscape, these aquatic resources are of high value for dependent species and ecosystem function. The current placement of the Thorne Lane interchange would have permanent fill and shading impacts to Wetland 1, a Category 2 wetland, and to Wetland 2, a Category 3 wetland. Stream 1 would also be impacted. The EA does not include a 404(b)(1) analysis of alternatives that would reveal the least environmentally damaging practicable alternative. Additionally, other than stating the wetland category ratings and the acreage of direct impacts to wetlands and wetland buffers, the EA does not describe the affected aquatic habitats with respect to their plant and animal species, functional values, and integrity. For the cumulative effects analysis, the EA states that "Wetlands in the study area have been substantially affected by past and present land use actions. Taken together, these effects have resulted in significant wetland loss in the resource study area."[17] The EA needs additional information to provide a meaningful cumulative effects assessment of the past, current, and reasonably foreseeable impacts to aquatic resources.

Recommendation: In a revised NEPA analysis:

- Describe the affected environment and analyze cumulative effects from wetland/aquatic resources losses in the project landscape that provides the information described above.
- Include a range of alternatives and 404(b)(1) analysis that identifies the least environmentally damaging practicable alternative and demonstrates the manner and extent to which aquatic resource impacts and their associated effects on dependent aquatic and terrestrial species are or could be avoided, minimized and, if necessary, effectively compensated to ensure continued function within this geographic setting.

m. Native oak vegetation. We are concerned that the proposed North segment of the I-5 JBLM project would disturb 10.93 acres of oak community, convert 5.62 acres to pavement, and 2.03 acres to roadside grass or other vegetation. It would also have temporary disturbance to 3.27 acres of oak community. As stated in the EA, "oak trees and stands of oak trees provide an important source of food, cover, nest sites, and arboreal movement routes for more than 200 species of vertebrate wildlife, including species listed by the State of Washington as threatened, such as the western gray squirrel or designated for protection under the MBTA, such as the rufous hummingbird. …approximately 7 percent of the landscape contains native oak vegetation communities with a significant component of native oak in either remnant naturalized forest or urban forest." [18] The species list contains many species that are dependent upon and likely to be associated with areas projected for disturbance or conversion.[19]

[16] At EPA, contact Christopher Cora, EPA remedial Project Manager for JBLM, at 206-553-1478.
[17] EA p. 233
[18] EA, page 139
[19] EA, pages 140-142

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not occur until the project is approved to move forward.

In response to EPA's request for additional information, while not needed for the determination, WSDOT estimates a total of 58 people may be displaced. In order to estimate the number of people that would be directly affected by the displacement of 17 housing units, average household size information was collected from US Census American Community Survey. The latest US Census estimates for the Block Group containing the affected area (south end of Tillicum) is 3.19 persons per occupied housing unit. However, since the average for renter-occupied housing is higher than for owner-occupied, and most of the displacements are renter-occupied, we used that figure, which is 3.40 persons per unit. WSDOT estimates that the project's displacement of 17 housing units will involve about 58 people.

In response to the specific mention of asthma (which did not come up in public or agency scoping), the project is not likely to adversely impact air quality conditions compared to No Action. More detail is provided in the response to comment 34f. Regarding construction emissions, #34f also provides the requested additional detail on mitigation strategies to avoid and minimize construction-related emissions.

COMMENT 34 (CONTINUED)

The EA does not include analysis or disclosure of the direct, indirect and cumulative impacts to these high value habitats that would result from the combined north and south project corridor segments. There is also no discussion of mitigation for these impacts.

Recommendations:

- Analyze and disclose full project corridor direct, indirect, and cumulative impacts to habitats, including oak vegetation, oak woodlands, oak savannah, and prairie. Propose mitigation and disclose the likelihood of commitment, implementation and effectiveness of proposed mitigation.

We appreciate the opportunity to convey EPA's comments on the I-5 JBLM Congestion Relief Project. If you have questions or would like to discuss our comments, please contact me at 206-553-1601 or at littleton.christine@epa.gov, or contact Elaine Somers of my staff at 206-553-2966 or at somers.elaine@epa.gov.

Sincerely,

Christine B. Littleton

Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit

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The EA examines the potential for indirect and cumulative impacts. WSDOT followed the 2008 WSDOT/EPA/FHWA joint guidance as described on page 228. WSDOT examined the operational impact findings from each discipline and concluded that operation of the Build Alternative does not contribute to a cumulative effect.

WSDOT determined the appropriate impact area using the methodology set, and agreed to, during scoping for this project. WSDOT is a very active user of EJSCREEN, and we are aware that it was updated recently to have a default 1 mile buffer. However, that default does not mean that it has been adopted as the standard. FHWA's guidance still uses the ½ mile buffer. By using the ½ mile buffer, the project team was able to adequately assess the impacts from the proposal, in compliance with current national standards. Geographic constraints (closed borders of the military base and the area lakes), as well as the planned construction sequencing to keep I-5 open during construction, minimize the potential for redirection.

f. Air

Regarding the potential for increased exposure, WSDOT/FHWA's analysis indicates air quality would stay about the same for CO and MSAT emissions under both the Build Alternative and No Action.

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CO concentrations for both the Build and No Build alternatives are well below the National Ambient Air Quality Standards. This project is in an area that meets the National Ambient Air Quality Standards and the project would not cause or contribute to a violation of the standards. In addition, MSAT and vehicular PM emissions will decrease between now and the project's design year with improved vehicle technology. Overall, these changes should result in improved health outcomes for the people in the project area.

In 2020, at the Thorne interchange, the Build Alternative 1-hour CO levels are expected to increase slightly over existing conditions, from 4.1 to 4.2 parts per million (ppm). The levels remain well below the standard of 9 ppm. The increase in estimated CO levels is the result of the receptor being closer to the new roadway than the existing roadway (10 feet instead of 20 feet), as well as increased traffic volumes traveling through the intersection. The CO levels in 2040 are expected to decrease to 3.6 ppm. This information has been added to Section 4.4.4.

The Thorne intersection would be moved south of the existing location. The new site would be near, but not immediately adjacent to, the existing ramp. Moving traffic closer to the receptor would lead to higher concentrations at this site. At the same time, CO concentrations would be expected to decrease near the existing interchange.

Under 2040 Build Alternative, WSDOT estimated that increased VMT would cause MSAT emissions to be about 10% higher than the 2040 No Build (see page 88). For context, improvements in vehicle technology are going to reduce the MSAT emissions under both Build and No Build. In 2040, MSAT emissions under the Build Alternative would be about 65% below existing conditions.

EPA's concern about vulnerable populations' exposure to construction emissions is noted. Additional information about construction air quality and mitigation measures have been added to the EA in Section 4.4.7.

Sensitive receptors within the project study area include three schools (Woodbrook Middle School, Evergreen Elementary School, and Tillicum Elementary School), the Madigan Army Medical Center on JBLM, the Sea Mar Tillicum Medical Clinic, the Tillicum-Woodbrook Community Center, and the bike/ped trail. These have been noted in Section 4.4.2 of the EA.

WSDOT followed conformity requirements for selecting intersections for CO hot-spot analysis and receiver placement at these locations. These intersections are the locations most likely to have the highest CO concentrations because traffic is close to where people may spend time. It can be reasonably assumed that as one gets farther away from these intersections, air quality effects from the project will decrease and other sources will dominate the pollutant concentrations at the microscale.

To streamline project air quality analysis, WSDOT uses a screening tool, WASIST (WA State Intersection Screening Tool), to conservatively estimate CO emissions at intersections, ensuring compliance with conformity regulations. This tool is only intended to be used for intersections. Modeling for other receptors is typically

WSDOT Response – Comment 34 (continued)

not done for transportation projects, is time-consuming and expensive, and would confirm that the air quality in the project area meets all current air quality standards.

g. Public Engagement

The EA describes public engagement conducted during the planning process as well as during the preparation of the EA in Appendix F. The EA is supported by planning studies conducted between 2013 and 2015. These studies included extensive public engagement which was documented in the reports identified in Section 3.3 of the EA (including the Phase 1 study which documents development of an I-5 corridor strategy, the Phase 2A study which documents the development and screening of multimodal improvement options, and the Phase 2B study which summarizes the development and evaluation of a shortlist of the most effective multimodal improvement packages). The Phase 2A report, in particular, presents substantive detail about public engagement in the identification and screening of improvement options, particularly at the June 2014 open house, and notes how stakeholder input was used in crafting final alternatives. Where records were kept, the number of participants at public meetings was identified. No record was made of demographic diversity.

Regarding the September 2015 Open House in Tillicum, a variety of opinions were voiced regarding the Gravelly Thorne Connector. The opinions expressed included concern regarding impacts to four single-family homes at the proposed intersection of the proposed Gravelly Thorne Connector to Gravelly Lake Drive. Other attendees expressed interest in having the Gravelly Thorne Connector constructed first, (prior to I-5 construction), support for the Gravelly Thorne Connector having northbound and southbound vehicle travel lanes, and general support for the Gravelly Thorne Connector so that there is a local road connection between Lakewood and the Tillicum neighborhood. As a result of the community input received at this meeting and other subsequent meetings, the design of the intersection of the Gravelly Thorne Connector and Gravelly Lake Drive was revised to avoid impacts to the four single-family homes. The project team also explored options for constructing two vehicle travel lanes and bike/pedestrian facilities on the Gravelly Thorne Connector, but limited right-of-way availability resulted in the proposal to construct a southbound lane only.

WSDOT conducted tailored outreach to ensure quality two-way communication with the affected communities and neighborhoods. The project team is implementing WSDOT's inclusive engagement techniques, and is fully committed to continued engagement throughout the delivery of transportation improvements in the project area.

Written comment forms were made available at each public meeting. Evaluation forms were not distributed at the meetings. Appendix F of the EA has been revised to add clarity regarding how the issues and themes that emerged from public outreach efforts were resolved.

h. Noise

Following FHWA regulations and WSDOT policy, WSDOT evaluated 12 noise walls, some with multiple configurations,

WSDOT Response – Comment 34 (continued)

throughout the I-5 JBLM North Study Area and found that only four noise walls met the FHWA feasibility and reasonableness criteria. In the 2040 Build Alternative, the total number of modeled receivers exceeding the FHWA Noise Abatement Criteria (66 dBA) is 140, these receivers represent 172 single- and multi-family residents and 43 non-residential locations. The proposed noise walls provide noise abatement for 147 of the 172 impacted residents. The remaining 25 residents exceeding 66 dBA do not qualify for a noise wall, due to their distance from the highway and lack of sufficient density. WSDOT evaluated two additional walls that are feasible and reasonable and is continuing to work with JBLM staff to evaluate the possibility of constructing these noise walls on JBLM property to provide noise abatement for additional residents. Any other forms of noise abatement would still need to meet the feasibility and reasonableness criteria.

Traffic noise is not considered to be a contributing factor to the disproportionally high and adverse impact on low-income populations and minority populations discussed in Section 4.14 of the EA. That impact determination relates to displacements, not an increase in traffic noise. Adherence to FHWA traffic noise regulations and WSDOT policy has resulted in a project where full and fair participation in noise issues from all has been encouraged, where adverse impacts have been avoided, or will be minimized and/or mitigated, and where minority and low-income populations have been treated fairly. In response to EPA's comment received during the public review period, additional detail about the noise environment in Tillicum has been included in Section 4.5.4.

i. Air Quality

In making the determination that the Build Alternative is not a "project of air quality concern," the interagency consultation partners were confident that the project will not cause or contribute to a violation of particulate matter air quality standards in the area. Because the project was determined to not be a project of air quality concern, no hot-spot analysis was done.

With on-going improvements in vehicle technology, particulate matter emissions in the project area are expected to decrease over time. For both the Build and No Build Alternatives, these decreases will be most notable in more congested and highly traveled areas. Overall, technology improvements are expected to improve the health for all populations and will likely have the greatest impact on the most vulnerable populations, such as young children and the elderly.

It is expected that users of the bike/ped path or overpasses will experience pollutant concentrations that are similar to or less than the levels at the intersections, which are modeled as the worst case locations. The distance between the bike/ped trail and the roadway varies along the corridor, in general about 120 to 130 feet from the roadway. Consideration has been given to providing separation between the trail and I-5 mainline where feasible but the constraint of the secure military facilities limited location options for the facility.

As requested, construction mitigation measures to address air pollutants have been added to Section 4.4.7 of the EA. WSDOT allows the use of dust

WSDOT Response – Comment 34 (continued)

palliatives on our projects; it is up to the contractor to choose the product that is most appropriate for the situation. Any palliatives used will comply with state standards outlined in Washington State Department of Ecology's "Methods for Dust Control," revised July 2016.

j. Greenhouse Gas Emissions and Climate Change

The EA includes a qualitative evaluation of greenhouse gas emissions resulting from the proposed action, as is recommended by WSDOT's internal guidance. This EA was substantially completed before the CEQ Guidance was finalized. In the guidance, CEQ states, "Agencies should exercise judgement when considering to apply this guidance to the extent practicable to an on-going NEPA process… Agencies should consider applying this guidance to projects in the EIS or EA preparation stage if this would inform the consideration of differences between alternatives or address comments raised through the public comment with sufficient scientific basis that suggest the environmental analysis would be incomplete without application of the guidance, and the additional time and resources needed would be proportionate to the value of the information included."

This project is not expected to affect the state's progress towards the GHG reduction goals. Because of the network characteristic of the transportation system, changes to one segment of road has little effect on the state's overall ability to meet GHG reduction goals. WSDOT is working to reduce transportation related GHG emissions. Additional information about WSDOT actions to reduce emissions can be found in WSDOT's Sustainable Transportation Action Plan, available at: http://www.wsdot.wa.gov/NR/rdonlyres/D757E036-06DA-4805-85FF-025ACDDA8545/0/20160908SusTranActionPlan20152017.pdf.

The EA examines the potential for indirect and cumulative impacts. WSDOT followed the 2008 WSDOT/EPA/FHWA joint guidance as described on page 228. WSDOT did not find that the improvements associated with the Build Alternative would result in land use changes (see page 214).

Regarding transit providers, during the alternatives development process, WSDOT worked closely with key stakeholders including Sound Transit, Pierce Transit, and Intercity Transit regarding existing and future planned transit service on the corridor. The study evaluated numerous alternatives utilizing various combinations of added lanes, restricted lanes, JBLM gate access points and multimodal options including the PSRC Vision 2040 transit improvements proposed for the corridor. A key criterion in evaluating all multimodal and local street options was the effectiveness on reducing traffic congestion along I-5. Analysis found that even with a doubling of existing express bus service in the corridor, there would be insufficient congestion relief on I-5 to eliminate the need for highway widening. Additionally, the Gravelly Thorne Connector is intended to provide an alternative route for local trips between Tillicum and Lakewood and to enhance public welfare and safety through removing Tillicum's sole access reliance on I-5. While the transit providers are actively engaged in enhancing transit service between Olympia and Seattle, ultimately,

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transit funding and route planning is outside the control of WSDOT.

The Build Alternative will restore temporarily disturbed areas to an equivalent or better condition over time consistent with the Roadside Policy Manual. Impacts to wetlands and wetland buffers will be mitigated as described in Section 4.8 of the Environmental Assessment.

k. Geology, Soils, Groundwater and Hazardous Materials

Geology & Soils

The request to explore and evaluate alternative locations and alignments for the Thorne Lane and Berkeley Street interchanges is not warranted. The underlying native soil at the Thorne Lane and Berkeley Street interchanges is Vashon Glacial Drift. In general, this material is a medium dense to dense soil that can resist global instability and is not susceptible to liquefaction or long-term settlement. Soft fine-grained sediments, peat, and loose sand deposits may be present above the Vashon Glacial Drift at the Thorne Lane interchange. Loose sand deposits may also be present in the vicinity of Murray Creek. This soil may be susceptible to global instability, liquefaction, and long-term settlement. Based on geotechnical experience in the vicinity, and historical review of the geologic information at the interchanges, we anticipate the soft fine-grained sediments, peat, and loose sand deposits to be surficial and shallow in depth. If encountered, the soft-grained sediments, peat, and loose sand deposits will be overexcavated to mitigate the risk of instability, liquefaction, and long-term settlement. Structure footings will be founded on the medium dense to dense Vashon Glacial Drift. Engineered, compacted structural fill will be used to backfill overexcavated locations for at-grade roadways and above-grade embankments.

In the vicinity of Murray Creek, on the east side of I-5 and south of the Berkeley Street Interchange, Pierce County has mapped 0.35 acres as a possible erosion hazard. This mapped area encompasses I-5, the northbound off-ramp to Berkeley Street, and a section of the earth embankment between the two pavements. The existing roadways and earth embankment are engineered, and no history of erosion was encountered during our windshield survey or historical document reviews. Similarly, the Build Alternative roadways and earth embankment will be engineered to mitigate for the risk of erosion.

Groundwater & Hazardous Materials

The potential for spreading contaminants to groundwater along the project alignment are expected to be minimal, or improved, when compared to the existing conditions along the project corridor. During construction and operation, the following documents will be utilized to prevent or minimize the potential for groundwater contamination: Best Management Practices (BMPs); Spill Prevention, Containment, and Countermeasures (SPCC) Plan; Stormwater Pollution Prevention Plan (SWPPP); WSDOT Highway Runoff Manual (WSDOT, 2014).

The I-5 JBLM Vicinity Congestion Relief Project Groundwater Technical Memorandum dated June 7, 2016 addresses the increased impervious surface created by the project and

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associated increased runoff. A Spill Prevention, Containment, and Countermeasures (SPCC) Plan will be developed before construction activities in accordance with WSDOT Standard Specifications Section 1-07.15. The SPCC Plan aims to eliminate spills and provides a procedure to deal with spills if they occur. This, in addition to the use of the WSDOT Highway Runoff Manual and any other applicable BMPs will provide the same, or improved, treatment of surface water runoff prior to any potential interaction with water supply sources or their associated aquifers and some reduction in susceptibility/risk. Additional information can be found in the I-5 JBLM Vicinity Congestion Relief Project Groundwater Technical Memorandum.

l. Wetlands

The EA discloses the potential impacts to wetlands. Notable early wetland avoidance measures included design modifications to the mainline and northbound Berkeley Interchange off-ramp near Murray Creek to avoid Wetland 5. Additionally, the bike/pedestrian path bridge span over Murray Creek is proposed to be long enough to avoid the creek-associated wetland (Wetland 5). Also, the Thorne Lane Interchange in the vicinity of Wetland 1 and 2 is proposed to be elevated on bridge piers to avoid and minimize wetland impacts to the greatest extent possible. Detailed wetland information such as descriptions of "…the affected aquatic habitats with respect to their plant and animal species, functional values, and integrity" is included in the project Wetland and Stream Delineation Report (October 2015) and Wetland Conceptual Mitigation Memo (April 2016). As stated in the avoidance and minimization portion of the EA (4.8.6), "…wetland impacts that could not be avoided or minimized would be offset through compensatory mitigation. Impacts to wetland functions that could not be avoided would be replaced." Regulatory requirements which include such elements as mitigation ratios designed to guard against loss of wetland acreage and function will ensure the 0.06 acres of expected permanent wetland impact will be offset or result in a net benefit to wetlands rather than a loss. Expected use of Pierce County's In Lieu Fee Program should result in wetland mitigation being appropriately located where the greatest environmental benefit can be attained. The detailed information provided in the Wetland Conceptual Mitigation Memo (April 2016) concerning expected impacts to wetland functions from the 0.40 acre of bridge shading will also be evaluated by regulatory authorities for appropriate mitigation in a later project stage. EPA's comments on cumulative effects have been noted (see response to comment Environmental Justice (34e)).

A 404(b)1 analysis is triggered under the existing Corps regulations for projects requiring permit approval under a Section 404 Individual Permit. An Individual Permit would not be triggered for this project.

m. Natural Oak Vegetation

The comments from U.S Environmental Protection Agency (comment 34), U.S. Fish and Wildlife Service (comment 36), and U.S. Army Corps of Engineers (comment 38) express concern about the 10.93 acres of "oak community" reported in the Environmental Assessment (EA) and the

WSDOT Response – Comment 34 (continued)

Fish, Wildlife, and Vegetation Discipline Report (DR) as impacted by the project. It is important to understand the origin of that classification to understand its implication. During development of the DR, road-side field observation and aerial photograph review were used to approximately delineate and map land cover types at a landscape scale into nine categories. To provide some additional characterization of the remnant/naturalized forest category, which provides the highest ecological value to fish and wildlife, field notes were used to further subdivide it into conifer-dominated, oak community, and riparian/wetland. These divisions were not intended to equate to any regulatory agency's definitions of priority habitat, oak savannah, or other terms, and further are not intended to indicate habitat quality, maturity, or species compositions.

Much of the disturbance to oaks or oak stands would be confined to narrow strips of vegetation paralleling I-5 that are largely separated from other habitat areas by fencing, paved or dirt roads, or other development. The suitability of any oaks in these areas to provide important wildlife habitat is limited by traffic and other urban noise, presence of invasive or non-native understory vegetation, and lack of connectivity to other habitat areas. Aerial photo analysis and field examination suggests that approximately 40 to 50 percent of the area identified in the EA and DR as the 10.93 acres of impacted "oak community" are part of a pure or nearly pure oak stand larger than an acre. Further, these areas are divided into three patches that are isolated by roads, residential and urban developments. The other impacted "oak community" acres are mostly single trees along the I-5 right-of-way or trees located in dense stands of Douglas fir.

Washington native oaks (*Quercus garryana*) do not have special status under federal government regulation, including the Endangered Species Act. None of the federally listed species evaluated in the EA, the DR, and the Biological Assessment have both the potential to be in the project area and a dependence on oaks or oak communities. The western gray squirrel (*Sciurus griseus*) is the only state-listed species with a dependence on oak that had potential be in the study area and was thus evaluated in the DR and EA. The assessment in the DR and EA concludes, based on agency experts and data, that the gray squirrel is not documented in the study area, and is unlikely to be found near development, and more specifically unlikely within 200 to 300 yards of I-5. More information can be found in the DR and its addendum.

At this stage of project design and assessment, the DR and EA mitigation measures include requiring the design to minimize native vegetation removal, particularly trees, and to restore temporarily disturbed areas to an equal or better condition consistent with WSDOT's Roadside Policy Manual. Considering the inclusion of priority oak habitat in the critical areas regulations of Pierce County and the City of Lakewood, and the JBLM best practice of planting six native oaks for each disturbed oak, project-specific review and permitting of the final design by stakeholder agencies is expected to include a detailed assessment of oaks that will be impacted by the project, and a final determination of mitigation needed, if any.

COMMENT 35

Office of Administration

Mayor Ron Lucas

November 22, 2016

Mr. Dean Moberg PE
FHWA Area Engineer
711 S. Capitol Way, Suite 501
Olympia, WA 98501

RE: I-5 JBLM Vicinity Congestion Relief Project Environmental Assessment
Identified Impacts and Request for Mitigation

Dear Mr. Moberg:

Thank you for providing the Town of Steilacoom with copies of the document referenced above for our review. As an identified stakeholder in this project, we appreciate the invitation to participate throughout the EA process. We applaud the efforts made by FHWA, WSDOT and SCJ Alliance to create a process that is both inclusive and collaborative in nature and we support completion of this project intended to relieve current congestion in this important corridor.

As identified in the study, the Town of Steilacoom serves many users of this corridor. The Town is home to many active and retired military personnel who both frequent JBLM as well as travel throughout this section of I-5. Additionally, our Town arterials provide a conduit for the movement of traffic from the Steilacoom/DuPont Interchange (Exit 119) and Lewis North into the City of Lakewood, University Place, Tacoma and beyond. As JBLM has grown to become the largest military base on the West Coast, we have worked hard to accommodate this growth and integrate the effects into our community and transportation network. The study correctly points out that about half of the total traffic occurring in this corridor enters and exits I-5 from surrounding areas (p. 48, Factors Affecting Existing Traffic Conditions), and Steilacoom certainly experiences the impacts of this transportation attribute on our local street network.

Whenever serious accidents occur, heavy vehicle use is present or other adverse conditions exist on I-5, the resulting traffic impacts are felt immediately in Steilacoom as motorists attempt to avoid the congestion by using Town arterials to bypass the problem areas and reach their destinations. In fact, computer trip advisor applications even direct commuters through Steilacoom at these times. Whenever this occurs, traffic on side streets that intersect with Union Avenue (Steilacoom/DuPont Rd. within Steilacoom) stack up quickly, resulting in LOS F conditions on several collectors in Town.

1030 Roe Street, Steilacoom, WA 98388-4010 Phone (253) 581-1912 Fax (253) 582-0651

WSDOT Response – Comment 35

We understand the concern that residents of Steilacoom have with existing traffic congestion on Union Avenue, particularly at the intersection with Martin/Rainier Street. This location is impacted not only by local traffic, but also by traffic destined for the ferry terminal and, periodically, by drivers that choose to use local streets instead of I-5.

One of the regional challenges as traffic demand exceeds the capacity of the overall transportation system is the shifting of traffic patterns between local and county roads, state highways and interstate highways. Study of traffic demand on I-5 through JBLM identified that a key element of that demand is drivers making local (short distance) trips on the interstate highway. When I-5 becomes congested, some drivers making short trips shift to using local and county roads. As described in your letter, this is an existing condition in Steilacoom.

During construction of the project, we intend to keep the existing number of lanes on I-5 open to traffic between 5:00 a.m. and 8:00 p.m. on weekdays. We intend to apply standard restrictions on when lanes can be temporarily closed to allow construction activities. Temporary lane closures will be permitted between 8:00 p.m. and 5:00 a.m. We do not expect any detours routing traffic from I-5 onto local streets. The exception to this is at the

COMMENT 35 (CONTINUED)

This correspondence is intended to identify these significant long-range impacts to the Town of Steilacoom that do not appear to be adequately mitigated in the Study. Chapter 4 of the Study identifies many of the current conditions that exist (or will exist) as a product of this project. The Build Alternative Effects listed at Table 4.2-1 identify transportation mitigation designed to provide access to immediately adjacent neighborhoods and military installations during construction by closing one interchange at a time during completion of this project. With an anticipated 4-year project timeframe listed for the north phase, we can expect traffic conditions to deteriorate throughout that timeframe and for commuters to seek alternative routes similar to what they currently do when there are adverse driving conditions. As identified at Figure 4.3-5 of the Study, existing traffic without construction on I-5 already results with congestion occurring at Exit 119 and continuing north throughout the study area to Gravelly Lake Drive. These conditions will deteriorate significantly during the construction of this project, resulting in a significant increase in vehicular (bypass) traffic traveling on Town arterials. Construction vehicles and equipment will use Town arterials to transport necessary project materials. Motorists who are attempting to access JBLM will use Town arterials to avoid the construction and gain access to the Base. Motorists attempting to reach the communities listed above will access their communities via Town streets rather than attempting to stay on I-5. While some of these identified impacts may be addressed through the Traffic Management Plan identified in Section 4.3.5, this plan is insufficient to address the overall impacts throughout construction.

The largest impacted arterial streets in Steilacoom are Rainier St. and Union Ave. In particular, the intersection of Union Avenue at Rainier St./Martin St. and the Pierce County Ferry Loading Lanes are impacted, even without the impending project. During current peak hour conditions, Rainier St. (the primary conduit from Lakewood to Lewis N.) stacks vehicles for approximately 4+ blocks while a continual flow of traffic comes into Town from I-5/JBLM. As motorists become impatient with a lack of adequate gaps, they attempt to enter the roadway between vehicles, resulting in significant traffic hazards to both motorists and pedestrians. We anticipate this congestion will become a near constant situation once this project commences.

As a result of these described conditions, Town staff has identified the need to install enhanced traffic control at this location in the form of a proposed roundabout. The roundabout would keep traffic flowing and potentially mitigate the direct impacts of the JBLM/I-5 Project. If the JBLM/I-5 Project proceeds without this needed mitigation, significant adverse impacts to our community will occur. Town staff attempted to secure funding for this project through the Puget Sound Regional Council's 2014 project selection process. Even though we were unsuccessful, we continue to pursue completion of this project.

This project is extremely important to the Town of Steilacoom. Preliminary traffic engineering has been completed and a conceptual design has been created using local funding. Design engineering could commence using Town resources if the necessary construction funding for this project was identified.

WSDOT Response – Comment 35

Thorne Lane (Exit 123) and Berkeley Street (Exit 122) interchanges where temporary closures of ramps are necessary that will affect traffic patterns on local roads in Tillicum.

Maintaining traffic flow on I-5 during construction will be a high priority of the project. We have no reason to expect that any direct action of the I-5 improvement project through JBLM will detour traffic onto local streets in Steilacoom. Improving roads and intersections in Steilacoom is outside the scope of the I-5, JBLM Vicinity Congestion Relief Project.

As part of the I-5 widening project, a Transportation Management Plan (TMP) will be implemented. The TMP will address mobility and safety through the construction zone. Stakeholders have been invited to participate in the development of the TMP. During the Design-Build construct, the TMP will guide public information strategies as well as opportunities for stakeholder involvement in traffic management as the project evolves.

COMMENT 35 (CONTINUED)

The resulting roundabout would provide the necessary mitigation for the impacts associated with the additional traffic that will occur throughout the project timeframe. We respectfully request construction funding for this project as mitigation for the JBLM/I-5 Corridor Project impacts on Steilacoom as well as other surrounding communities. Staff is available as needed to discuss this project in greater detail and provide the additional information in this regard.

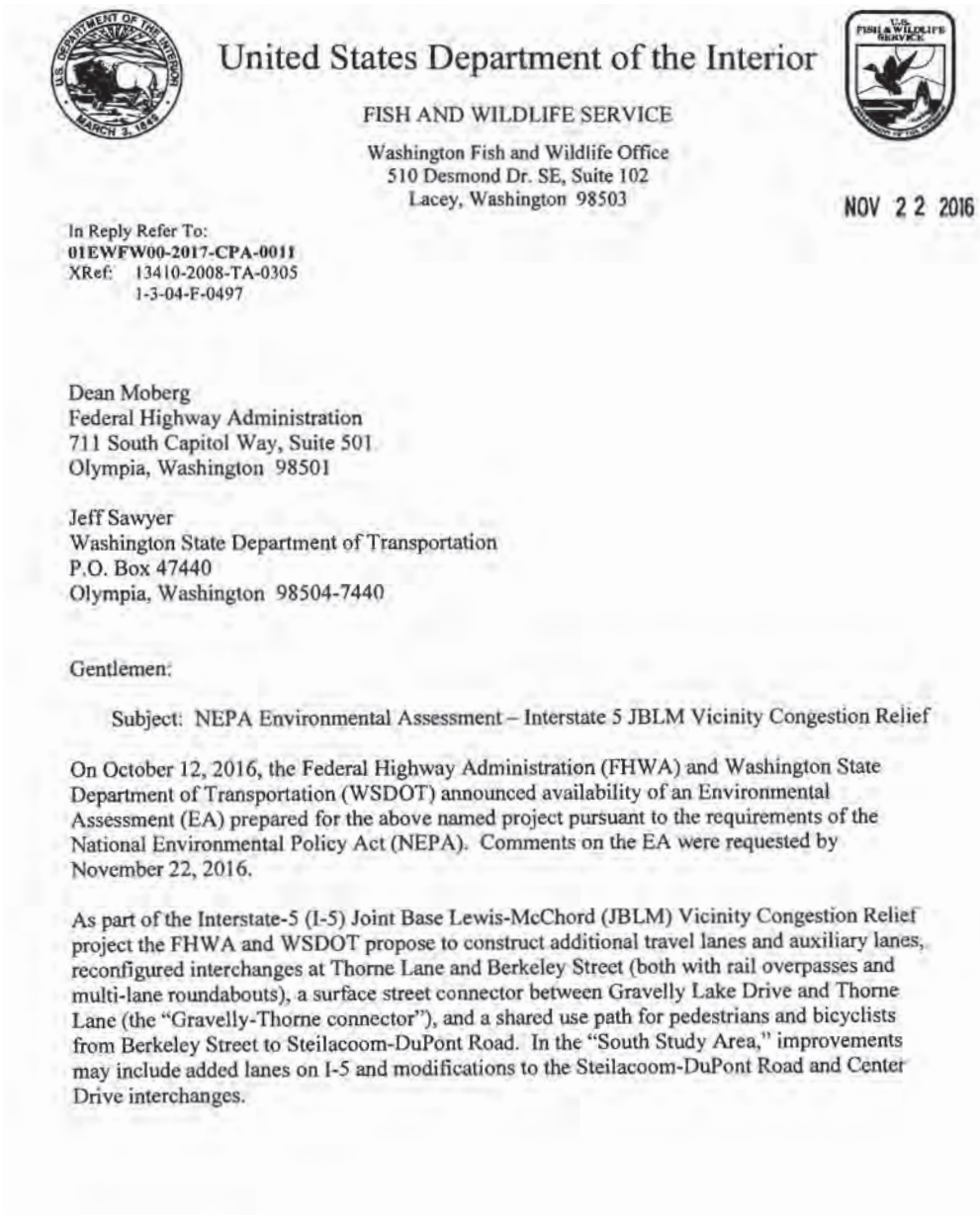
Thank you for your consideration.

Sincerely,

Ron Lucas
Mayor

C: Jeff Sawyer, Environmental & Hydraulic Manager, WSDOT
Paul Loveless, Town Administrator

COMMENT 36



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington Fish and Wildlife Office
510 Desmond Dr. SE, Suite 102
Lacey, Washington 98503

NOV 22 2016

In Reply Refer To:
01EWFW00-2017-CPA-0011
XRef: 13410-2008-TA-0305
1-3-04-F-0497

Dean Moberg
Federal Highway Administration
711 South Capitol Way, Suite 501
Olympia, Washington 98501

Jeff Sawyer
Washington State Department of Transportation
P.O. Box 47440
Olympia, Washington 98504-7440

Gentlemen:

Subject: NEPA Environmental Assessment – Interstate 5 JBLM Vicinity Congestion Relief

On October 12, 2016, the Federal Highway Administration (FHWA) and Washington State Department of Transportation (WSDOT) announced availability of an Environmental Assessment (EA) prepared for the above named project pursuant to the requirements of the National Environmental Policy Act (NEPA). Comments on the EA were requested by November 22, 2016.

As part of the Interstate-5 (I-5) Joint Base Lewis-McChord (JBLM) Vicinity Congestion Relief project the FHWA and WSDOT propose to construct additional travel lanes and auxiliary lanes, reconfigured interchanges at Thorne Lane and Berkeley Street (both with rail overpasses and multi-lane roundabouts), a surface street connector between Gravelly Lake Drive and Thorne Lane (the "Gravelly-Thorne connector"), and a shared use path for pedestrians and bicyclists from Berkeley Street to Steilacoom-DuPont Road. In the "South Study Area," improvements may include added lanes on I-5 and modifications to the Steilacoom-DuPont Road and Center Drive interchanges.

WSDOT Response – Comment 36

While the proposed program of improvements includes reconstruction of the existing Thorne Lane interchange and construction of new Gravelly Lake Boulevard to Thorne off system capacity, these elements have independent utility to serve the project purpose of providing congestion relief on I-5. Thorne Lane interchange reconstruction is necessary to accommodate the proposed added lane width on I-5. Reconfiguring the interchange in accordance with current design standards and provide necessary grade separation results in some similar features to the Cross Base Highway interchange proposal. Gravelly-Thorne connector improvements are proposed to reduce mainline traffic demand generated by short trips, an identified congestion relief strategy for I-5 noted in Chapter 4.

The SR 704 Cross Base Highway proposal is not part of the I-5 congestion relief program of improvements. It is not reasonably foreseeable, due in part to the lack of foreseeable funding in any reasonable planning horizon, the fact Cross Base Highway is not within a fiscally constrained transportation improvement plan, and the lack of an actionable NEPA Record of Decision. With respect to NEPA review alone, FHWA and WSDOT expect to conduct additional preliminary design and environment review, conduct public involvement, prepare additional NEPA

COMMENT 36 (CONTINUED)

According to the FHWA and WSDOT, the project would reduce traffic congestion and improve mobility along I-5 in the vicinity of JBLM while maintaining access for the communities and military installations neighboring the freeway. The current proposal is designed to achieve the following objectives: 1) relieve congestion on I-5 in the vicinity of JBLM; 2) improve local and mainline system efficiency; 3) enhance mobility; 4) improve safety and operations; and, 5) increase transit and demand Management opportunities.

Thank you for the opportunity to review and provide comments for the EA.

Relationship to Cross-Base Highway

During the course of our review, our office was contacted by staff from the U.S. Environmental Protection Agency, Region X (EPA). The EPA expressed concern regarding a possible relationship between the I-5 JBLM Vicinity Congestion Relief project and the State Route (SR) 704 Cross-Base Highway project.

According to the WSDOT (<http://www.wsdot.wa.gov/Projects/SR704/CrossBase/default.htm>; accessed November 18, 2016), the Cross-Base Highway is divided into five independent projects. Project 1, Spanaway Loop Road to SR 7, was completed during 2009. The four remaining projects are suspended for lack of funding.

However, uncertainty remains regarding the following:

- By rebuilding the Thorne Lane interchange, and by constructing the Gravelly-Thorne connector, the FHWA and WSDOT may be advancing portions of the Cross-Base Highway despite a history of significant concerns by both State and federal regulators.
- By advancing portions of the Cross-Base Highway now, the FHWA and WSDOT may be effectively streamlining delivery of remaining portions of the Cross-Base Highway despite significant concerns by both State and federal regulators.

We request that the FHWA and WSDOT provide a more complete explanation of the relationship between the I-5 JBLM Vicinity Congestion Relief project and the Cross-Base Highway project.

The U.S. Fish and Wildlife Service (Service) and EPA both took active roles during NEPA planning for the Cross-Base Highway project. Both agencies voiced a "non-concurrence" position during NEPA planning. Please be advised, several additional species and critical habitats have been recently listed under the Endangered Species Act and are known to occur on JBLM. The FHWA and WSDOT must consult with the Service under the Endangered Species Act before any portion of the I-5 JBLM Vicinity Congestion Relief project advances to permitting, right-of-way acquisition, or construction. Please be advised, because of recent changes to species status, reinitiation of consultation on the Cross-Base Highway project may be warranted.

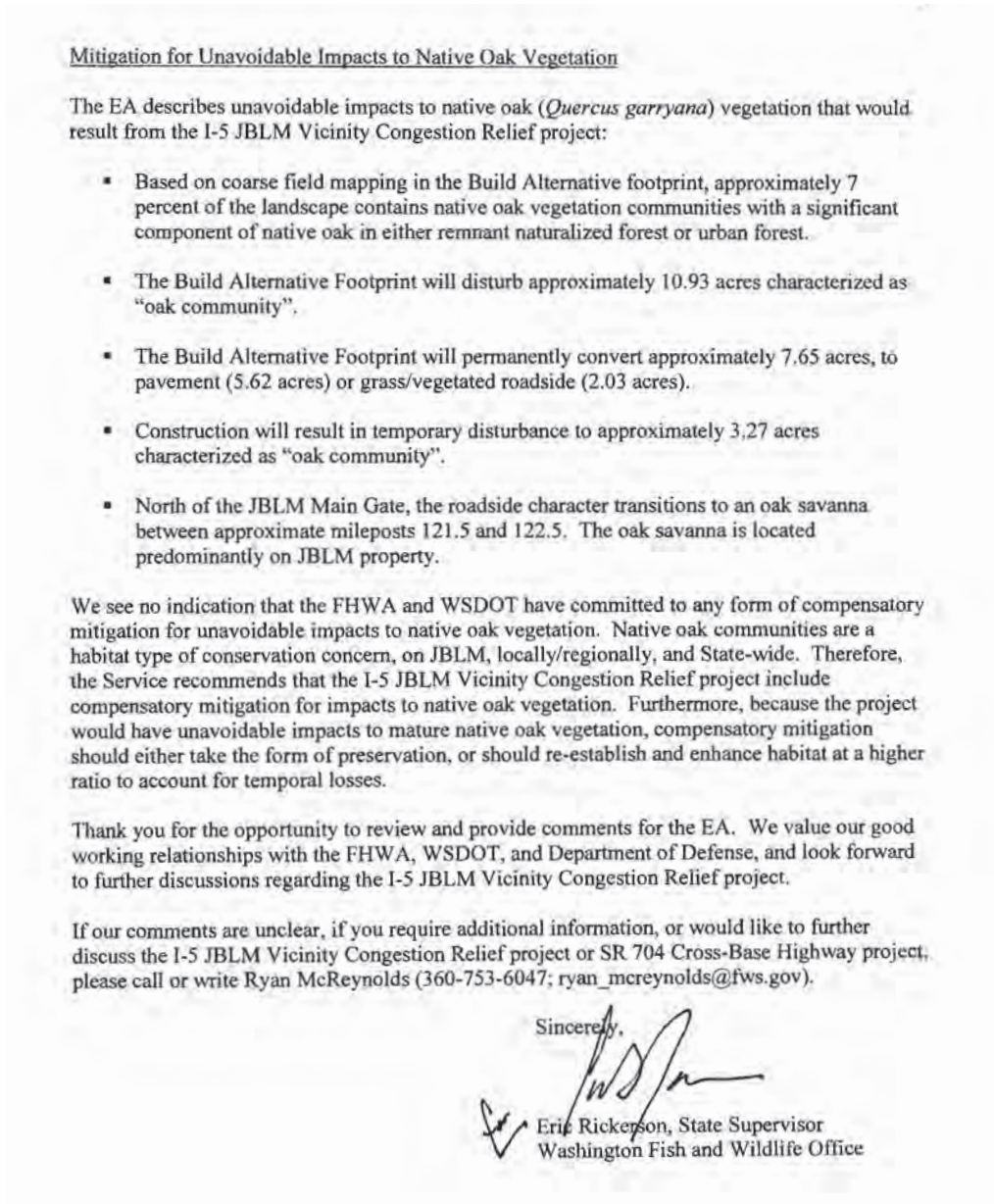
WSDOT Response – Comment 36

documentation for public review and issue a new NEPA decision.

The program of improvements associated with the I-5 JBLM Congestion Relief proposal are fully independent from the Cross Base Highway proposal. Any outstanding environmental concerns related to the Cross Base Highway are not ripe for discussion and have no bearing upon the I-5 congestion relief proposal.

The comments from U.S Environmental Protection Agency (comment 34), U.S. Fish and Wildlife Service (comment 36), and U.S. Army Corps of Engineers (comment 38) express concern about the 10.93 acres of "oak community" reported in the Environmental Assessment (EA) and the Fish, Wildlife, and Vegetation Discipline Report (DR) as impacted by the project. It is important to understand the origin of that classification to understand its implication. During development of the DR, roadside field observation and aerial photograph review were used to approximately delineate and map land cover types at a landscape scale into nine categories. To provide some additional characterization of the remnant/naturalized forest category, which provides the highest ecological value to fish and wildlife, field notes were used to further subdivide it into conifer-dominated, oak community, and riparian/

COMMENT 36 (CONTINUED)



Mitigation for Unavoidable Impacts to Native Oak Vegetation

The EA describes unavoidable impacts to native oak (*Quercus garryana*) vegetation that would result from the I-5 JBLM Vicinity Congestion Relief project:

- Based on coarse field mapping in the Build Alternative footprint, approximately 7 percent of the landscape contains native oak vegetation communities with a significant component of native oak in either remnant naturalized forest or urban forest.
- The Build Alternative Footprint will disturb approximately 10.93 acres characterized as "oak community".
- The Build Alternative Footprint will permanently convert approximately 7.65 acres, to pavement (5.62 acres) or grass/vegetated roadside (2.03 acres).
- Construction will result in temporary disturbance to approximately 3.27 acres characterized as "oak community".
- North of the JBLM Main Gate, the roadside character transitions to an oak savanna between approximate mileposts 121.5 and 122.5. The oak savanna is located predominantly on JBLM property.

We see no indication that the FHWA and WSDOT have committed to any form of compensatory mitigation for unavoidable impacts to native oak vegetation. Native oak communities are a habitat type of conservation concern, on JBLM, locally/regionally, and State-wide. Therefore, the Service recommends that the I-5 JBLM Vicinity Congestion Relief project include compensatory mitigation for impacts to native oak vegetation. Furthermore, because the project would have unavoidable impacts to mature native oak vegetation, compensatory mitigation should either take the form of preservation, or should re-establish and enhance habitat at a higher ratio to account for temporal losses.

Thank you for the opportunity to review and provide comments for the EA. We value our good working relationships with the FHWA, WSDOT, and Department of Defense, and look forward to further discussions regarding the I-5 JBLM Vicinity Congestion Relief project.

If our comments are unclear, if you require additional information, or would like to further discuss the I-5 JBLM Vicinity Congestion Relief project or SR 704 Cross-Base Highway project, please call or write Ryan McReynolds (360-753-6047; ryan_mcreynolds@fws.gov).

Sincerely,

Eric Rickerson, State Supervisor
Washington Fish and Wildlife Office

WSDOT Response – Comment 36

wetland. These divisions were not intended to equate to any regulatory agency's definitions of priority habitat, oak savannah, or other terms, and further are not intended to indicate habitat quality, maturity, or species compositions.

Much of the disturbance to oaks or oak stands would be confined to narrow strips of vegetation paralleling I-5 that are largely separated from other habitat areas by fencing, paved or dirt roads, or other development. The suitability of any oaks in these areas to provide important wildlife habitat is limited by traffic and other urban noise, presence of invasive or non-native understory vegetation, and lack of connectivity to other habitat areas. Aerial photo analysis and field examination suggests that approximately 40 to 50 percent of the area identified in the EA and DR as the 10.93 acres of impacted "oak community" are part of a pure or nearly pure oak stand larger than an acre. Further, these areas are divided into three patches that are isolated by roads, residential and urban developments. The other impacted "oak community" acres are mostly single trees along the I-5 right-of-way or trees located in dense stands of Douglas fir.

Washington native oaks (*Quercus garryana*) do not have special status under federal government regulation, including the Endangered Species

WSDOT Response – Comment 36 (continued)

Act. None of the federally listed species evaluated in the EA, the DR, and the Biological Assessment have both the potential to be in the project area and a dependence on oaks or oak communities. The western gray squirrel (*Sciurus griseus*) is the only state-listed species with a dependence on oak that had potential be in the study area and was thus evaluated in the DR and EA. The assessment in the DR and EA concludes, based on agency experts and data, that the gray squirrel is not documented in the study area, and is unlikely to be found near development, and more specifically unlikely within 200 to 300 yards of I-5. More information can be found in the DR and its addendum.

At this stage of project design and assessment, the DR and EA mitigation measures include requiring the design to minimize native vegetation removal, particularly trees, and to restore temporarily disturbed areas to an equal or better condition consistent with WSDOT's Roadside Policy Manual. Considering the inclusion of priority oak habitat in the critical areas regulations of Pierce County and the City of Lakewood, and the JBLM best practice of planting six native oaks for each disturbed oak, project-specific review and permitting of the final design by stakeholder agencies is expected to include a detailed assessment of oaks that will be impacted by the project, and a final determination of mitigation needed, if any.

COMMENT 37

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

November 22, 2016

Jeff Sawyer, Region Environmental & Hydraulic Manager
WA State Department of Transportation
Olympic Region
PO Box 47440
Olympia, WA 98504-7440

Dear Mr. Sawyer:

Thank you for the opportunity to comment on the NEPA/EA for the JBLM Vicinity Congestion Relief Project located in Pierce County. The Department of Ecology (Ecology) reviewed the information provided and has the following comment(s):

WATER RESOURCES: Vicki Cline (360) 407-0278

The proponent is responsible for inspecting the site to determine the location of all existing wells. Any unused wells must be properly decommissioned and decommission reports submitted to Ecology as described in WAC 173-160-381. This includes resource protection wells and any dewatering wells installed during the construction phase of the project.

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM:16-5681)

cc: Vicki Cline, WR

WSDOT Response – Comment 37

Comment noted.

COMMENT 38

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-3755

REPLY TO ATTENTION OF

November 22, 2016

Regulatory Branch

Mr. Jeff Sawyer
Washington State Department of Transportation
Post Office Box 47440
Olympia, Washington 98504-7440

Reference: WA State Dept. of Transportation (JBLM EA Review)

Dear Mr. Sawyer:

We received the "I-5 JBLM Vicinity Congestion Relief Project" Environmental Assessment (EA) dated October 2016. The Washington State Department of Transportation (WSDOT) is proposing to add lanes and make improvements on I-5 and local streets in the Joint Base Lewis-McChord (JBLM) vicinity. The project is located I-5 between Gravelly Lake Drive and Mounts Road between the Cities of Lakewood and DuPont, in Pierce County, Washington.

We have reviewed the EA. The document is well written and clearly presents the project purpose, need and alternatives. We have the following clarifying comments on impacts and mitigation that we can discuss with you as you are preparing the final project impact totals and mitigation plan:

1. Throughout the document, there is reference to temporary impacts to wetlands. On page 4.8 WSDOT is defining temporary impacts to include excavation. Please note the U.S. Army Corps of Engineers (Corps) considers excavation, permanently altering the elevation, in wetlands to be a permanent impact unless the post-project contours match the pre-construction contours. The Corps also considers vegetation that is removed by mechanized land clearing to be a permanent impact. Please provide additional information on what the impacts will be to these wetland areas so the Corps can confirm if they are considered temporary per our regulations.
2. For the indirect impacts to 0.40 acre of wetland and 0.89 acre of buffer due to shading from the interchange and pedestrian paths, the Corps may require mitigation to off-set the change in functions or functional loss from these impacts. Please provide additional information to the Corps on the impact areas (vegetation loss, functions impacted) for our review and we will determine if mitigation is necessary.

WSDOT Response – Comment 38

1. We have deleted the language in 4.8 of the Environmental Assessment "...or excavation associated with construction of support structures located within the wetland." Temporary wetland impacts are presently estimated to be relatively low (0.15 ac). The requested temporary impact details will be provided when project design is further developed Section 404 permitting is initiated.

2. We acknowledge that the Corps may request mitigation to off-set the change in functions or functional loss from the 0.40 indirect impacts from shading. Detailed information about vegetation loss and expected impacts to wetland function is included in the project Wetland Conceptual Mitigation Report (April 2016) rather than in the more succinct wetland EA section. We agree this information is needed by the Corps to evaluate possible mitigation measures and intend to further refine it after the project design is further developed and Section 404 permitting is initiated.

3. We acknowledge the Corps is requesting more information about project impacts to wetland buffers to evaluate possible mitigation for additional indirect impacts to wetland functions. We intend to further define the nature and quantities of these impacts when the project

COMMENT 38 (CONTINUED)

3. For the permanent impacts to 1.1 acres and temporary impacts to 0.55 acre of wetland buffer, the Corps may consider these to be an additional indirect impact to wetlands that may require mitigation. Please provide information on what vegetation will be removed from the buffers, and if the functions at the wetland will be impacted by the buffer loss.
4. We support the WSDOT strategy to modify the pedestrian trail to avoid and minimize tree removal.
5. In general the Corps supports mitigation proposing to use In-Lieu Fee (ILF) Programs. We will review your mitigation proposal to determine if purchasing credits from the ILF Program is adequate and appropriate mitigation to offset the proposed wetland impacts associated with the project.

As stated in the EA, a Department of the Army (DA) permit is required for the project work. Since a DA permit is necessary for this work, do not commence construction on the project before a permit has been issued. If you have any questions, please contact me at (360) 407-6912 or at sandra.l.manning@usace.army.mil.

Sincerely,

Sandra Manning

Sandra Manning, Project Manager
Regulatory Branch

WSDOT Response – Comment 38

design is further developed and Section 404 permitting is initiated.

COMMENT 39

From: [redacted]
Sent: Sunday, November 20, 2016 8:45 PM
To: Sawyer, Jeff
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 11/20/2016 8:45:17 PM

======My Contact information======
Name: Amy Supple
E-mail: [redacted]
Phone:
Street Address:
City:
State: WA
Zip Code:

===== My Question/Comment/Complaint =====

The proposed build alternative at Thorne Lane is a waste of taxpayer dollars. The Thorne Lane interchange is not a place of congestion and the cost of this part of the project is incredibly misaligned. This part of the project is incredibly expensive with very little actual benefit.

WSDOT Response – Comment 39

The primary reason for proposing rebuilding the Thorne Lane interchange is so that I-5 can be widened to add one lane each direction. Significant traffic congestion on I-5 in the area of the Thorne Lane interchange during peak traffic periods has become commonplace and is having a direct detrimental impact of the mobility of people and goods along this strategic north-south highway. The existing Thorne Lane bridge over I-5 – built in 1954 – will not allow any additional lanes on I-5.

The I-5 interchange at Thorne Lane serves Woodbrook, Tillicum, JBLM's Logistics Gate and Camp Murray. The proposed configuration of the I-5 interchange at Thorne Lane is designed to support traffic demand through 2040 and beyond.

COMMENT 40

From [redacted]
Sent: Saturday, December 03, 2016 12:12 PM
To: Elliott, Bill
Subject: I-5 - JBLM Vicinity Congestion Relief Project EA Comments

The following is the contents of a form submitted on 12/3/2016 12:12:36 PM

======My Contact information======
Name: Anirban Basu
E-mail: [redacted]
Phone:
Street Address:
City:
State: WA
Zip Code: 98005

===== My Question/Comment/Complaint =====

The congestion on I-5 between Portland and Seattle has exploded even in the last few years. It is not surprising giving the tremendous growth both cities have been enjoying. My family and I drive back and forth on I-5 almost once every month to visit family. We certainly would be considered HoV travellers. However, I do not believe that adding HoV lanes will solve the problem of congestion. On parts of I-5 where HoV lanes are there, it's still congested, probably because there are many HOV travellers on the road. I think the DoT should consider building expresss lanes though main urban areas like Tacoma, JBLM area, Olympia and Kelso to allow through traffic and separate them from local traffic in these regions that is growing. These express lanes can also serve in the future for autonomous vehicles. Thank you.

WSDOT Response – Comment 40

A recommended future improvement outside the scope of this project is for the designation of express lanes as you describe. Express lanes would be for regional traffic not entering or exiting the highway through congested/urban areas. The outer lanes would be for those making shorter length trips and needing to enter or exit the highway within the urban area.