

City Council. Though Fife acknowledges the cost required to maintain 20th Street East in the alignment that was in the City's Comprehensive Plan, a change to that alignment could not be implemented without a change to the City's Plan. In fact, the Fife City Council updated its Comprehensive Plan to reflect the DOT's proposal, as a proposal, but would still prefer that 20th Street be maintained in its current alignment. Fife's updated Comprehensive Plan also requires elevation of SR 167 at 26th and 28th Streets, for extension of these arterials between 70th Avenue East and Freeman Road.

8. **Pg 1-20** Third item in the table should reflect Fife's preference for maintenance of 20th Street East in its current alignment and for elevation of SR 167 over Fife's designated 26th and 28th Street East corridors.
9. **Pg 2-3** The description of the Value Engineering process for the SR 167 / I-5 interchange should include acknowledgment of the fact that the realignment of 20th Street East requires formal action by the Fife City Council and that Fife staff members had no authority to approve such realignment, at the time of the VE meetings.
10. **Pg 2-4** Second row of the "General Criteria" column should indicate that reconstruction of local streets will conform not only to the design standards but also the Comprehensive Plan of the local jurisdiction.
11. **Pg 2-6** Third and/or fourth lines of Table 2.3-2, continued, "Specific Design Criteria" should indicate that the 20th Street alignment and 26th and 28th Streets will all be as shown in the City of Fife Comprehensive Plan
12. **Pg 2-12** Third paragraph of "Mainline Description", first line, should read "southeasterly" rather than "southwesterly".
13. **Pg 2-13** Last paragraph should include mention of grade separation structures to carry SR 167 over 26th and 28th Streets East
14. **Pg 3-274** Sixth paragraph should be revised to reflect the fact that most principal arterials in the vicinity of SR 167 are operated by the City of Fife rather than Pierce County. Pacific Highway East and 70th Avenue East should be included in the list of Principle arterials. The last paragraph on the page should be revised by removal of 70th Avenue East from the list of minor arterials, and the addition of North Levee Road East.
15. **DEIS Page S-2/3** Regional mobility and multimodal transport are identified as needs of the project. The Puget Sound regional transportation system includes both light and heavy rail facilities. This is not mentioned or discussed in this report.

L04-007

L04-008

L04-009

L04-010

L04-011

L04-012

L04-013

L04-014

L04-015

RESPONSE L04-008

Due to the complexity of the I-5 interchange, it is not possible to maintain 20th Street East in its current alignment. WSDOT analyzed using a grade separation to carry SR 167 across 26th Street East and 28th Street East, and found that it is not feasible due to the elevation profile constraints from nearby I-5 interchange. Providing a grade separation at this location may be possible by substantially layering 26th/28th to provide sufficient vertical clearance of SR 167 in this location. WSDOT will continue to coordinate the design in this area with the City of Fife.

RESPONSE L04-009

Please see response to comment numbers L04-007 and L04-008, above.

RESPONSE L04-010

Reconstruction of local streets and roads will meet the design standards of the controlling jurisdiction. WSDOT will work with the City during the final design and construction of the project.

RESPONSE L04-011

Please see response to comment numbers L04-007 and L04-008, above.

RESPONSE L04-012

The FEIS is revised to correct this information.

RESPONSE L04-013

Please see response to comment number L04-008, above.

RESPONSE L04-014

The FEIS is revised to reflect this information.

RESPONSE L04-015

Sound Transit's Regional Express bus service and commuter rail service is discussed in the Transit section section 3.14.2 of the FEIS.

16. **DEIS Page S-3 Figure 3** depicts the realignment of 20th and 70th, including a pair of roundabouts. 20th St E is a Pierce Transit (501) bus route. 70th is a designated truck route in Fife. What are the impacts to these routes as a result of the realignment?

L04-016

RESPONSE L04-016

The realignment of 20th Street East adds minimal travel time. The roundabouts will be designed to handle large trucks and busses. There will be less delay time for vehicles entering and exiting the roundabouts as compared to a traditional signalized intersection.

17. **DEIS Page S-9** Ensure Figure 8 is current with City of Fife projects.

L04-017

RESPONSE L04-017

The Summary has been revised to follow a 'reader-friendly' format, and no longer includes figure 8. Section 3.11 of the FEIS was updated to include current development in the City of Fife.

18. **DEIS S-21** Identify those developments that are already permitted (as well as un-and under developed parcels) by the City for displacements, disruptions and relocations. Transportation mitigation measures need to include the actual/anticipated impacts on the infrastructure itself. The added construction and detour traffic will add much higher than anticipated traffic loads to the roads. The reduction in pavement life needs to be calculated and mitigated by WSDOT as part of this project. The pedestrian and bike facilities need to be consistent with the approved Parks and Rec. Plan of the City.

L04-018

RESPONSE L04-018

Because the SR 167 freeway from SR 161 to SR 509 is a new route, detours onto city streets will be minimized. WSDOT will work with the City during final design to identify appropriate mitigation due to detours affecting the city streets. Pedestrian and bike facilities are updated in the section 3.15 of the FEIS.

19. **DEIS –1-1** Regional mobility in this region includes rail facilities. No mention of that here.

L04-019

RESPONSE L04-019

Improving Regional Mobility is mentioned in the Purpose and Need statement in chapter 1. FEIS section 3.14.2 contains more information on Rail Facilities.

20. **DEIS 1-20** 20th St E and 70th Ave E are bus and truck routes respectively. The VE recommendations, and WSDOT acceptance of them, need to recognize this. Consult Fife on the over Pacific Highway portion still being investigated.

L04-020

RESPONSE L04-020

WSDOT will continue to coordinate with the City of Fife throughout final design of the project.

21. **DEIS 2-4** Degradation of City streets needs to be addressed, not just reconstruction. Regional mobility includes rail lines. They are not discussed in this report.

L04-021

RESPONSE L04-021

Section 3.14 in the FEIS has been revised to include information on rail lines. Please also see response to comment L04-018 regarding street degradation.

22. **DEIS 2-6** Since bridge impacts are still being studied as part of this DEIS, the I-5 interchange structure should be reconfigured to allow 20th St E to continue along its current alignment. The realignment depicted in the plans includes two roundabouts. With the current development along 70th Street East of the industrial nature, 70th Street East will still have a large percentage of truck traffic. The roundabouts, if constructed, will need to be of a design to accommodate the anticipated truck volumes. This would indicate a large design diameter of the roundabout, which, in turn, would require a great deal more property than indicated on the plans. If this is the case, the I-5 structure should be lengthened to allow 20th Street East to retain its existing alignment and the appropriate traffic signal designed and constructed.

L04-022

RESPONSE L04-022

The roundabouts will be designed to accommodate truck and bus traffic. Please also see response to comments L04-007.

23. **DEIS 2-12** The I-5 interchange had only one design option considered. Another option, should the construction be phased, should include interim ramps to city streets at I-5.

L04-023

24. **DEIS 2-13** The purpose and need portion of the DEIS identified that the Port of Tacoma will have twice as much truck traffic (300,000 to 600,000) by the year 2014. Is the rationale for having only single lanes across I-5, for SR 167, consistent with the earlier statement? Note the design year here is 2030. Identify 20th and 70th as bus and truck routes, respectively. Ensure the project is consistent with City bike and Pedestrian plans.

L04-024

25. **DEIS 2-22** The I-5 interchange structure should be lengthened to accommodate the existing alignment of 20th Street East. The intersection has truck, and public and school bus traffic. In addition, the twin roundabouts severely impact both the NB 70th Avenue East and the EB 20th Street East traffic movements.

L04-025

26. **DEIS 2-36** This roadway section doesn't provide for future HOV expansion.

L04-026

27. **DEIS 2-37** The effects of increased traffic due to the construction traffic and the detoured traffic have a detrimental effect on Fife roads. This reduction in roadway life needs to be mitigated.

L04-027

28. **DEIS 3-273** The roadway system bounding the project area needs to be updated to include the I-5/54th Ave E interchange.

L04-028

29. **DEIS 3-274** Update the existing surface streets section to include discussion and identification of principal arterials and minor arterials as defined in the Transportation Comprehensive Plan. These include Pacific Highway East (maintained by the City), 70th St E, and Valley Ave.

L04-029

30. **DEIS 3-275** Some of the 2000 LOS as identified in table 3.14-1 do not correspond to the adopted City of Fife transportation Comprehensive Plan. The figure needs to be updated.

L04-030

31. **DEIS 3-279** Pierce Transit route 501 serves Fife and needs to be added to the report.

L04-031

32. **DEIS 3-282** The traffic projects section needs to reference the approved City of Fife Transportation Comprehensive Plan. The Fife Plan also contains "build" and a "no build" alternatives for the construction of SR 167 and its impacts on the City street system in general. Required

L04-032

RESPONSE L04-023

The I-5 interchange will include freeway to freeway connections only. Access to I-5 from local streets are provided at the 54th Street interchange and the Port of Tacoma Road interchange.

RESPONSE L04-024

The traffic forecast for year 2030 for through movement on SR 167 over I-5 shows that a single lane bridge would handle the demand approximately 1100 vehicles per hour (vph). This was discussed in the Value Engineering (VE) study and it was concluded that a single lane bridge will substantially reduce costs. 20th Street East and 70th Avenue East have been identified as truck routes in the FEIS. The FEIS is updated and is consistent with the City's bicycle and pedestrian plans.

RESPONSE L04-025

The roundabouts will be designed to accommodate truck and bus traffic. Due to the complexity of the I-5 interchange, it is not possible to maintain 20th Street East in its current configuration. Please also see response to comment L04-008.

RESPONSE L04-026

This figure shows the SR 161 bridges crossing the Puyallup River. HOV facilities are not planned for SR 161.

RESPONSE L04-027

Please see response to comment L04-018.

RESPONSE L04-028

The roadway system bounding the project area along I-5 is the I-5/SR 18 interchange to the north, and the I-5/Port of Tacoma interchange to the southwest. The I-5/54th Avenue interchange is contained within this boundary.

RESPONSE L04-029

The "Existing Surface Streets" subsection in section 3.14.2 of the FEIS includes discussion and identification of principal arterials and minor arterials. The FEIS is updated to describe 70th Avenue East as a principal arterial.

RESPONSE L04-030

A discussion of Canyon Road and SR 18 truck climbing is included in the Transportation section 3.14 of the FEIS. The DEIS was distributed in February 2003 and the City of Fife Transportation Plan (December 2002) was not available at the time this section was written. The City's LOS were generated from data obtained in 1999, 2000, 2001 and 2002 (Transp. Plan page 7). The DEIS used 2000 as the base year. The 2000 data was not revised to keep the existing condition at year consistent throughout the EIS document. The FEIS still uses year 2000 as the existing condition.

project lists are considerably different in the “no build” alternative. These need to be referenced in the DEIS.

33. **DEIS 3-285** An interim capacity change, based on a phased construction of the northern portion of SR 167, should include ramps to surface streets at the I-5 interchange. The planned improvements to Valley Ave are four lanes, not 5-lanes as stated. 70th Ave E will be reconstructed from the existing 2-lanes to 5-lanes.
34. **DEIS 3-286** The SR 167 structure at the I-5 interchange should be extended to allow 20th St E to remain in its current alignment. The two planned roundabouts will be required to be designed for truck, public transit, and school bus operations. This design will require a large amount of ROW for construction. The alignment of 20th St E should be allowed to remain the same with reconstruction of the 20th and 70th intersection to Fife standards and planned construction.
35. **DEIS 3-287** Impacts to railroad include the wetland mitigation area. This area is a planned UPRR sidetrack to facilitate improved operations and efficiencies for the union Pacific Railroad. The purpose and need of the project is to provide for regional mobility as well as to serve multimodal local and port freight movement. The proposed wetland mitigation area severely limits the port freight movement objective of the SR 167 purpose. The possible required improvements for bikes and pedestrians should adhere to the Parks and Rec. and Transportation Plans.
36. **DEIS 3-288** WSDOT and the contractor should directly notify the City of Fife of all freeway and local road closures. Detour and construction traffic will effect local street pavement life and should be mitigated by the project.
37. **DEIS 3-289** Table 3.14-5 lists the two roundabouts as mitigation for the 20th and 70th intersection. The mitigation should be changed to extending the structure to allow for the existing alignment of 20th St E. City streets utilized for construction haul routes and for construction detours will experience a decline in actual pavement life, versus design pavement life. This reduction needs to be mitigated by WSDOT and the SR 167 project.
38. **DEIS 3-292** The section of 70th Ave E crossing I-5 is currently a 2-lane section with a 25 MPH posted speed limit. 20th Street East does not include any sections with a posted 20 MPH speed limit as shown on figure 3.14-2. 54th Ave E is not a 2-lane section north of I-5. Identify the Port of Tacoma lanes and speed limit within the City limits.

L04-032

RESPONSE L04-031

The FEIS section 3.14.2 is updated to include Pierce Transit route 501.

L04-033

RESPONSE L04-032

Section 3.14.3 has been revised to include information from the 2002 City of Fife Transportation Plan.

L04-034

RESPONSE L04-033

The I-5 interchange will provide freeway to freeway connections only. Local access to I-5 is provided at the 54th Avenue East Interchange and at the Port of Tacoma Road Interchange. The FEIS "Capacity Changes" in section 3.14.3 of the FEIS is updated to include the correct planned improvements to Valley Avenue and 70th Avenue East, based on this comment.

L04-035

RESPONSE L04-034

The roundabouts will be designed to handle large trucks and busses. Due to the complexity of the I-5 interchange, it is not possible to maintain 20th Street East in its current alignment.

L04-036

RESPONSE L04-035

We have updated the Conceptual Mitigation Plan to include several possible wetland mitigation sites. The UPRR site is identified as one of several wetland mitigation sites. WSDOT will coordinate with the City to develop safe accommodations for users of the City’s bicycle and pedestrian facilities impacted by construction.

L04-037

RESPONSE L04-036

WSDOT will work with the City to identify detour routes and road closures during final design and construction.

L04-038

RESPONSE L04-037

WSDOT will work with the City to resolve any issues regarding detours during final design and construction. Please also see response to L04-034.

RESPONSE L04-038

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

39. **DEIS 3-294** The LOS at the 70th and Valley Ave intersection does not match the City of Fife Transportation Comprehensive Plan. This needs to be corrected.

L04-039

RESPONSE L04-039

Please see response to comment number L04-030.

40. **DEIS 3- 297** The realignment of 20th Street East needs to be changed to reflect the extension of the structure to accommodate the existing 20th Street E alignment.

L04-040

RESPONSE L04-040

Due to the complexity of the I-5 interchange, it is not possible to maintain 20th Street East in its current alignment.

41. **DEIS 3-301** The City of Fife has an adopted Transportation Comprehensive Plan. That Plan needs to be referenced, discussed, and adhered to with the SR 167 construction. Certain elements of the Plan are assumed to be completed by the SR 167 EIS. Other elements of the plans, including future transportation links and projects need to be identified and constructed or mitigated by the SR 167 project. The water, sewer, and storm water comprehensive plans identify the service areas, capital projects, and required system extensions and improvements. The SR 167 should design and construct improvements and extensions as planned and required by these comprehensive plans or provide full mitigation for them.

L04-041

RESPONSE L04-041

The design phase will continue to utilize the most current information provided by the jurisdictions.

RESPONSE L04-042

Flooding at the proposed I-5 Interchange will be addressed through the relocations of Hylebos Creek and Surprise Lake Drain and the associated riparian areas. This information is detailed in section 3.2.5 of the FEIS.

Stormwater and Environment Comments

1. The Tier II DEIS for SR167 takes a different approach for the analysis of storm drainage impacts and mitigation measures than the Tier I DEIS did. The Tier II DEIS analysis of storm drainage impacts lacks the traditional details provided by a hydrologic model, where new flows are estimated and their impacts on the existing drainage system are evaluated. There is no mention of the impact of additional flood water on the existing severe flooding problems, particularly in Hylebos Creek at the proposed I-5 interchange.

L04-042

RESPONSE L04-043

The project has conducted additional analyses including hydrologic modeling of the Hylebos sub-basin (MGS et al. 2004). This comprehensive analysis of the project's effects on hydrology, channel hydraulics, and geomorphology was completed to assure that we address the impacts of our project on the watershed. This assessment has included use of hydrologic simulation models and continuous runoff data to assess existing and future conditions, both with and without the project. The analysis shows that the RRP will improve flooding conditions in the I-5 interchange area. Water resources and wetlands impacts were analyzed per sub-basin, and sections 3.2 and 3.3 of the FEIS were updated to include this information.

2. The Tier II DEIS proposes to use riparian restoration (a wooded landscape and buffer treatment) along the creeks, especially Hylebos Creek, as the chief mitigation measure for all flood storage and peak runoff impacts created by the project. The document is silent on the current impacts that I-5 has on the various watersheds in the Fife area, particularly Hylebos Creek. The existing freeway system has contributed significantly to the existing water quality and quantity problems in the lower Hylebos basin. Additional runoff can only make the existing situation worse.

L04-043

RESPONSE L04-044

A hydrologic simulation modeling of Hylebos Creek was recently completed to support preparation of the FEIS. This study addressed flooding, erosion, stream bank stability and other issues to insure the RRP will be effective for stormwater flow control as well as meet ecological stream functions. The relocated streams will be larger than the existing channels, and affected constriction points will be eliminated.

3. If the riparian restoration process is to successfully mitigate flow volumes, the stream channel must be enlarged to pass the new peak flows

L04-044

to Commencement Bay. Otherwise, more flooding of private property will occur, along with other related erosion, sedimentation, scour, etc. impacts. Public and private bridges over Hylebos Creek and an existing culvert are the primary constrictions along the channel. If these structures are widened to increase flow capacity, the water surface profile during floods will be greatly improved.

4. The loss of flood storage by filling in FEMA flood plains and frequently flooded areas is noted, but the mitigation is vague. No future water surface profiles or flood elevations are provided. It is stated on page 3-31 that the DOE will require a hydrologic model to be developed to show that the riparian restoration mitigates for added impervious area. Restoration alone may not be adequate for the Fife area. Technical justification will be needed to show compliance with the new DOE standards. Without some working knowledge of how much the riparian restoration will improve flooding conditions, it is not possible to evaluate the proposal in a logical method.
5. The DEIS also ignores the existing Drainage District 21 and 23 boundaries, the districts' authority, and their responsibility in maintaining the various drainage ditches for the past 66+ years. The proposed relocation of streams and ditches inside the drainage district boundaries should also involve drainage district approval, since the districts represent the property owners who are taxed for storm drainage maintenance.
6. Proposed riparian restoration areas assume land acquisition for the purpose of containing floods. The goal is to contain all the flooding in the areas to be acquired for habitat restoration over the long term. Exhibits 2.5-20 and 3.2-2 do not show matching flood prone areas and habitat restoration areas. Without lowering the water surface profile resulting from the project, even more land might be needed in the flooded areas. The only way to make sure the buffer areas near the streams can contain the flood waters is to have a working knowledge of both the flood elevations and the land contours, which will allow volume calculations in the buffer zones. The DEIS is too vague and lacks any analysis to verify that the proposed land acquisition is enough.

Land acquisition for riparian restoration, buffers, and wildlife corridors takes valuable property off the local tax roles and reduces the tax base for services and support.

Waiting to have their property condemned for WSDOT flood plain acquisition does not help farmers and other property owners with their current problems. It also keeps the value of their property down, since it can be used only as a flood plain or riparian buffer.

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L04-046

L04-047

RESPONSE L04-045

Floodplain impacts, including indirect and cumulative impacts, have been clarified in section 3.2 of the FEIS. Embankments and structures will be designed, to the extent practicable, to pass maximum flood flows without substantial change to that experienced today. If necessary, additional flood storage will be provided. A final mitigation plan addressing floodplain mitigation measures will be developed prior to construction. Please also see response to comment L04-043.

RESPONSE L04-046

Drainage district (#21 and 23) boundaries are included in the figure 3.10-9 and drainage district activities are included in section 3.10 of the FEIS. WSDOT will continue to keep the drainage districts informed of plans associated with stream relocations and coordinate with them during final design of the project.

RESPONSE L04-047

A comprehensive analysis of the project's effects on hydrology, channel hydraulics, and geomorphology was completed to assure that we address the impact of this project on the watershed as part of the Riparian Restoration Proposal (RRP). The study compares the impacts and benefits between the RRP and conventional detention ponds. The modeling results show that this alternative stormwater flow control strategy will meet or exceed Ecology's and WSDOT's design standards. Flood profiles and land contours were used in this analysis to calculate storage volumes. In collaboration with stakeholders, the Riparian Restoration Proposal (RRP) has been further described in sections 3.2, 3.3, 3.4, and 3.17 of the FEIS. Future design of the RRP will be coordinated with the City through the RRP Technical Advisory Group.

7. The proposed riparian restoration on Hylebos Creek ends near 8th Street, but the creek channel continues another 5,800 feet downstream to its mouth near Marine View Drive. There is no mention of downstream channel improvements, flow restrictions or existing structures that need to be modified or removed to assist in the conveyance of stormwater or to improve water quality.
8. The FEMA flood maps are incorrect for the Fife Ditch area and are completely omitted in the area bounded by 20th Street, 70th Avenue, and I-5. Although the FEMA maps are incomplete, Fife has aerial and ground photos from the 1990 and 1996 major storm events that accurately depict these flooded areas. These should be incorporated in any storm drainage planning. The City of Fife eventually intends to modernize the FEMA flood maps inside the city limits, when funding is available.
9. The ultimate construction of SR167 with mitigation would benefit the remaining property in Fife. However, long delays between planning, right-of-way acquisition, and full project construction would exacerbate the current drainage and flooding problems in Fife that already affect properties near the SR167 corridor.
10. The City adopted a city-wide Comprehensive Stormwater Management Plan in 2002. The report has valuable information regarding storm drainage issues and proposed capital improvements. The DEIS should refer to the document, when applicable, as part of the overall drainage analysis and mitigation plan.
11. The City has nearly finished a consultant study showing flood plain elevations from the 1990 and 1996 storm events, based on aerial photographs and ground shots. The study including setting benchmark control in Fife and establishing water surface elevations in frequently flooded areas in the Wapato Creek, Hylebos Creek, and Fife Ditch conveyance systems. This is valuable information for studying the water surface profiles of flooded areas in Fife and for estimating compensatory storage volumes.
12. **Pg S-11** First paragraph, seventh line, description of the corridor area omits the proposed wetlands mitigation area. This omission significantly understates the impact of the project on the City of Fife.
13. **Pg 1-27** Second “un-bulleted” paragraph should include a description of the process to be followed in resolution of the conflict with USFWS, USEPA, and WDFW, if the formal conflict resolution process is not to be followed.
14. **Pg 3-17** The first full paragraph should be revised to reflect data obtained from a completed stream survey and hydraulic modeling effort. The

L04-048

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RESPONSE L04-048

Hylebos Creek is contained within its banks at the 100-year flood downstream of 8th Street East. Although the 4th Street pedestrian bridge represents an obstruction, flood waters will back up into the Milgard Nature Area, which was designed for periodic inundation. Please see section 3.2.2 of the FEIS.

RESPONSE L04-049

Section 3.2 of the FEIS is revised to reflect more recent and accurate flood maps.

RESPONSE L04-050

The hydrology, drainage and floodplain improvements proposed as mitigation for the SR 167 Extension project will be implemented as soon as possible to minimize water resource impacts in the project area.

RESPONSE L04-051

This Comprehensive Plan was used extensively in development of the recently completed hydrologic analysis for Hylebos Creek. Portions of the hydrologic model used in development of the Comprehensive Plan were directly incorporated into the new model for Hylebos Creek. References to this work are included in section 3.2 of the FEIS.

RESPONSE L04-052

This Comprehensive Plan was used extensively in development of the hydrologic analysis for Hylebos Creek. Portions of the hydrologic model used in development of the Comprehensive Plan were directly incorporated into the new model for Hylebos Creek, see section 3.2.

RESPONSE L04-053

The FEIS has been revised to ensure that all proposed wetland mitigation sites are referenced. Please see section 3.3.7 of the FEIS.

RESPONSE L04-054

WSDOT will follow the formal conflict resolution process.

RESPONSE L04-055

This information has been included in section 3.2 of the FEIS.