

Response

Comment B-3

B-3 Logan Neighborhood

1. The added height to the vertical concrete barrier would cost approximately \$88,000 with a non measurable difference in dBA reduction. Table 4-14 on page 4-29 of the draft EIS shows mitigation to a 64 dBA level for both 12 and 14 foot wall heights. This added cost to the mitigation is not justified without added benefit to adjacent residents.

2. Research on special barrier types is being conducted at this time. The results of the research will be used in final design of the project. (Results will be contained in the research report: Special Noise Barrier Applications Phase III). A copy of this report will be provided for review by request.

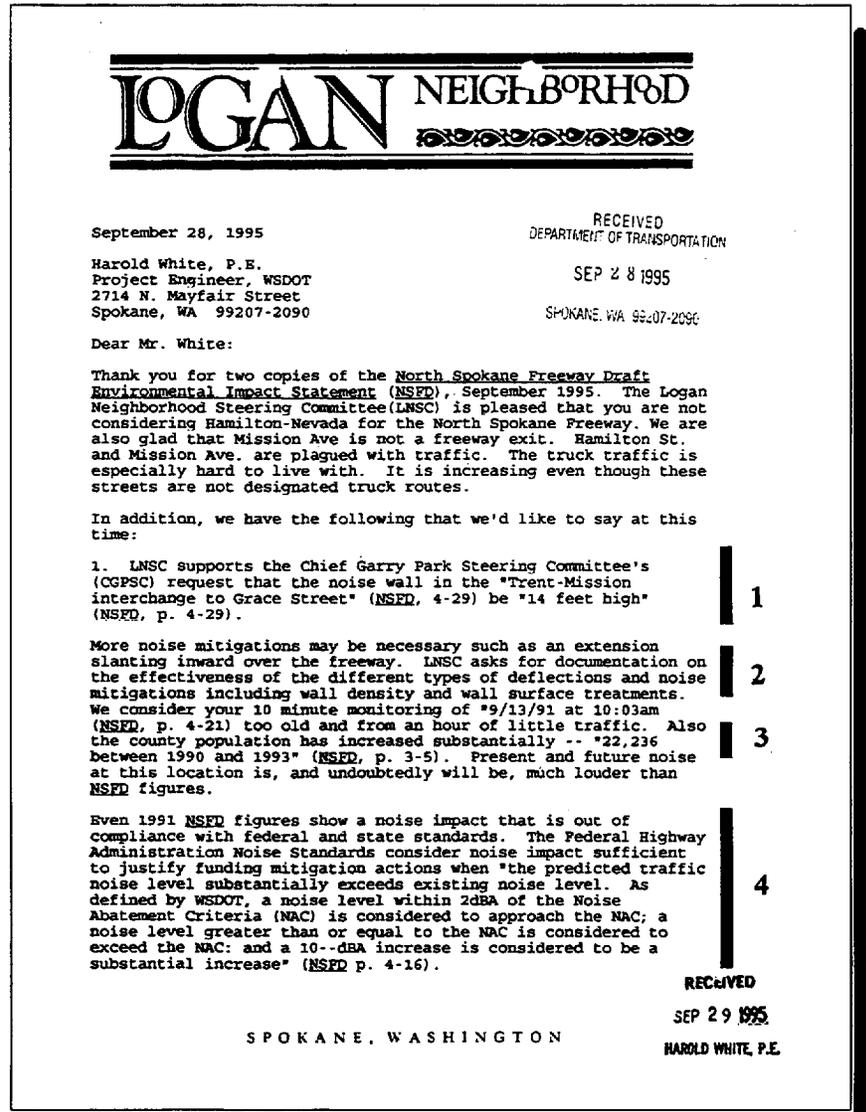
3. Noise measurements are taken to quantify existing noise conditions. Traffic is counted when the measurement is made in order to be able to validate the noise model. The noise measurement is only a snap shot in time of the condition at that particular date. The predictions of the existing condition are based on traffic levels at peak hour for the area which produces the worst case scenario.

4. The receptor locations in Table 4-9 to which you may be referring are numbers 2,3,10,15,31,32,34 and 35. Mitigation is considered for areas which approach or exceed

the noise abatement criteria or when noise levels substantially exceed the existing levels in comparison to the design year under the build alternatives.(DEIS p. 4-27)

5. It is recognized that urban recreation trails will cross or parallel transportation facilities which have high traffic volumes and thus high noise levels. The noise levels predicted are for

peak hour traffic volumes and so at off peak times the noise levels near the freeway will be lower. The people walking the trail will also notice a drop off of noise levels with every doubling of distance from the highway. Mitigation is proposed in the Spokane River area and this should reduce the impacts to the trails. (DEIS p. 4-30 Table 4-16)



LOGAN NEIGHBORHOOD

September 28, 1995

Harold White, P.E.
Project Engineer, WSDOT
2714 N. Mayfair Street
Spokane, WA 99207-2090

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DEPARTMENT OF TRANSPORTATION

SEP 28 1995

SPOKANE, WA 99207-2090

Dear Mr. White:

Thank you for two copies of the North Spokane Freeway Draft Environmental Impact Statement (NSFD), September 1995. The Logan Neighborhood Steering Committee (LNSC) is pleased that you are not considering Hamilton-Nevada for the North Spokane Freeway. We are also glad that Mission Ave is not a freeway exit. Hamilton St. and Mission Ave. are plagued with traffic. The truck traffic is especially hard to live with. It is increasing even though these streets are not designated truck routes.

In addition, we have the following that we'd like to say at this time:

- 1. LNSC supports the Chief Garry Park Steering Committee's (CGPSC) request that the noise wall in the "Trent-Mission interchange to Grace Street" (NSFD, 4-29) be "14 feet high" (NSFD, p. 4-29).

More noise mitigations may be necessary such as an extension slanting inward over the freeway. LNSC asks for documentation on the effectiveness of the different types of deflections and noise mitigations including wall density and wall surface treatments. We consider your 10 minute monitoring of "9/13/91 at 10:03am (NSFD, p. 4-21) too old and from an hour of little traffic. Also the county population has increased substantially -- "22,236 between 1990 and 1993" (NSFD, p. 3-5). Present and future noise at this location is, and undoubtedly will be, much louder than NSFD figures.

Even 1991 NSFD figures show a noise impact that is out of compliance with federal and state standards. The Federal Highway Administration Noise Standards consider noise impact sufficient to justify funding mitigation actions when "the predicted traffic noise level substantially exceeds existing noise level. As defined by WSDOT, a noise level within 2dBA of the Noise Abatement Criteria (NAC) is considered to approach the NAC; a noise level greater than or equal to the NAC is considered to exceed the NAC; and a 10--dBA increase is considered to be a substantial increase" (NSFD p. 4-16).

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HAROLD WHITE, P.E.

Response

Comment B-3 (Continued)

6. Noise levels are predicted to be 69 dBA at 60 meters (200 feet) from the centerline of the freeway. The parking areas are not impacted because they are not considered frequent outside human use area and other noise from parking vehicles will contribute to high noise levels. No frequent outside human use areas have been identified outside the school buildings within 120 to 150 meter (400 to 500 feet) from the centerline of the freeway that are not shielded by buildings on campus. Exterior noise levels are predicted to be 65 to 66 dBA outside of the school buildings in the design year, thus if windows and doors are closed on the freeway side, the contribution to interior noise levels would only be 40 to 41 dBA. (DEIS p. 4-14 & p. 4-15; CFR 772.11(a, b)) The worst case condition with windows and doors open would be a 55 to 56 dBA noise level contribution to the interior of the buildings from the freeway.

7. A detailed description of the barriers is contained in the discipline report entitled "North Spokane Freeway Noise Discipline Report, June 1994. A copy will be made available upon request from the WSDOT eastern region. The final barrier design and location will be dependent on final project design and public involvement findings.

8. The shielding from the roadway surface and jersey barriers at the edges of elevated structures does reduce noise levels for receivers underneath and immediately benefit.

9. A Roadside Master Plan will be developed to provide guidance to

LOGAN NEIGHBORHOOD

Federal and state standards direct that the noise should be 67 dBA for recreation areas, residences, and schools (NSED p. 4-16). When two people walk on nearby Centennial Trail, Tuffy's Trail, or on the Greene St. Bridge, conversation is impossible. The roar of traffic is too loud. The dBA are certainly higher than 70, an amount of noise that makes "telephone use difficult" (NSED p. 4-14).

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It is outrageously wrong to say that "Because of the shielding provided by the buildings, no outside or interior impacts are predicted for the Spokane Community College campus" (NSED p. 4-23). Will the students and staff have to wear ear plugs?

6

Noise mitigation wall lengths of 3,200 feet on the west and 2,200 feet on the east (NSED p. S-xv) seem inadequate. The length between Trent-Mission to Grace Ave. is at least 6,500 feet (NSED p. S-x). What segments are to be walled? How close are the walls to the freeway shoulders?

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Extraordinary means must be going to have to be taken to mitigate noise both at ground level and high levels. Obviously, "road-way surface and a standard jersey barrier" will not block noise from elevated segments (NSED, p. 4-17).

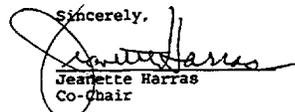
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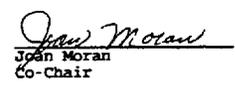
2. LNSC further supports CGPSC's request that the massive concrete structures be enhanced with landscaping. However, make sure long range maintenance plans are in place before choosing materials. The LNSC has had much heartache and anger over trees planted by WSDOT along Nevada and Ruby Streets being left to die.

9

3. LNSC supports CGPSC'S request that parking be made available for the two river trails and for SCC which will lose parking. Also please make plans to facilitate daily commuting between SCC, SIRT1 and GU for students that don't depend on private cars.

10

Sincerely,

 Jeanette Harras
 Co-Chair


 Joan Moran
 Co-Chair

c: Sherril Pierson, Chief Garry Park Steering Committee Secretary

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SPOKANE, WASHINGTON

adjacent to the over pass. However, receivers which have a clear line of sight to the traffic passing overhead receive little

the design process. Native trees, shrubs, and grasses are proposed, to visually soften the structural elements. Some non-native shade trees and/or shrubs may be interspersed among the native plantings to provide continuity and cohesiveness with vegetation found with the parks and residential neighborhoods bordering the proposed alignment. The plan will

address long term maintenance of the landscaping. The public and local agencies will be involved in

10. Parking issues will be coordinated with the Spokane Parks and Recreation Department and the Spokane Community College for their respective facilities. Spokane Transit Authority will be contacted as to the campus commute needs when the construction of the freeway reaches this area. The development of Park and Ride Lots or an inter-campus bus system could be developed.

Response

Comment B-4

B-4 Alt Trans, Washington Coalition for Transportation Alternatives

1. It is acknowledged that current projected revenues are insufficient to fund this project through completion. Additional revenues will be required. The Washington State Legislature will make the decision on any revenue increases.

2. The time-scale could be shortened if sufficient funding is made available.

3. Correction noted.

4. The intent of Table 2-10 was to compare the intersection volume-to-capacity-ratios. Refer to page 2-27 for an explanation of traffic analyses methodology.



Inland Northwest Chapter

S. 2028 Adams
Spokane, WA 99203-1238
October 9, 1995

Harold White, P. E.
Project Engineer, WSDOT
2714 N. Mayfair Street
Spokane, WA 99207-2090

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OCT 9 1995
HAROLD WHITE, P.E.

Dear Mr. White,

This letter is to provide comments on the Draft Environmental Impact Statement "North Spokane Freeway" (NSF), FHWA-WA-EIS-95-4-D dated September 1995. Our organization appreciates the opportunity to submit the comments contained herein.

ALT-TRANS is a 501(c)3 organization which advocates and promotes alternative transportation modes which are economically, socially, and environmentally viable. Although our primary emphasis is on the reduction in the use of single occupancy vehicles, we also have concerns on the movement of freight.

Our specific comments, not necessarily in order of importance, are as follows:

1. The estimated cost, page S-ix, of \$2 billion -- independent of questions of benefits -- is not consistent with reality. To explain, the Nov. 1994 Regional Transportation Plan lists \$2.88 billion as total potential expenditures for the next 20 years. Is it realistic to spend \$2 billion on the NSF and only \$880 million on all other transportation needs during the next 20 years? 1
2. On page S-vi is the statement, "The immediate need is for relief. . . The NSF is designed to accomplish this." The estimated time for earliest completion by the year 2020 means that the problems being addressed would not have a full solution for a quarter of a century. Considering the current traffic problems and the predicted growth in population and in transportation needs, the NSF time scale is not viable. 2
3. On page 2-13, the length of the LRT, listed as about 8 miles, should be about 18 miles. 3
4. On page 2-28, Table 2-10 there are numbers in the sections "TSM Alternative" and "Mass Transit & TSM Combined" which are not consistent. I totaled the numbers in the New Intersection Volume columns for TSM Alternative and Mass Transit & TSM Combined and got, respectively, 167,697 and 166,573 for the totals of the 34 intersections. The total difference of 1,124, due to the 4

MEMBERS INCLUDE: Aldai Corp. • Atmosphere Alliance • Alliance of Southworth Commuters • Cascade Bicycle Club • Clallam Transit • Coalition of Washington Communities • Community Transit • Energy Outreach Center • Global Telemailco • Greenhouse Action • Greenpeace • Institute for Transportation and the Environment • KlappanTransit • League of Women Voters • The Mountaineers • Northwest Bicycle Foundation • Palouse-Clearwater Environmental Institute • Peninsula Neighborhood Assoc. • Port Townsend Bike Advisory Committee • Puget Sound Council of Senior Citizens • Puget Sound Light Rail Transit Society • Seattle Electric Vehicle Assn. • Sierra Club • Cascade Chapter, Upper Columbia River Group • Sound Resource Management Group • Surface Transportation Policy Project • Urban Ecology • Seattle • Walla Walla 2020 • WA Assn of Railroad Passengers • Washington Citizens for Recycling • Washington Environmental Council • WA State Dept. of Transportation • TRIP Division • WA State Energy Office • WA State Rideshare Organization • WA State Transit Assn. • WA Trucking Assn. • WEnPAC • Zero Population Growth

Response

Comment B-4 (Continued)

5. Correction noted.
6. See Beltway/Bypass section of FEIS.
7. Considerations of current and projected transportation network needs were used for the alternatives described in the DEIS. Provisions for evaluating Transportation System Management (TSM) and Transportation Demand Management (TDM) included but were not limited to signal coordination, HOV lanes ride-sharing, increased public transportation and so on. Refer to Chapter 2, Alternatives Considered, pages 2-1 to 2-28 and Alternatives Considered But Rejected, pages 2-29 to 2-35.
8. It is not within the scope of this environmental impact statement to evaluate the impacts the construction of a freeway would have on global warming.

contribution of Mass Transit, was the result of improvements at only 5 of the 34 intersections. Therefore, using the data in Table 2-10, Mass Transit made no difference in 29 intersections. Yet, in comparing the Intersection Volumes for the Projected 2020 No-Build and the Mass Transit Alternative sections, 34 intersections out of 34 had improvements due to Mass Transit. My totals for the Intersection Volumes for the Projected 2020 No-Build and the Mass Transit Alternative sections are, respectively, 178,782 and 170,329 with the difference being 8,453. Mass Transit is logically more effective when used without TSM than when used with TSM, but by a factor of 7.5? The combination of "no improvements at 29 intersections" due to Mass Transit and the above mentioned factor of 7.5 in the intersection volumes destroys credibility in the numbers in Table 2-10. (Totals shown for each column in Table 2-10 would allow citizens to better understand and hence to better evaluate the information presented.)

4

5. Table 2-1 has what appears to be a wrong position of the numbers 261, 417, and 348. Perhaps they should be one row up and two columns to the right.

5

6. A Beltway has been and is still proposed instead of the NSF. In fact, a major issue raised at a well-attended October 1992 public meeting was the option of a Beltway/Loop Arterial. The Alternative of a Beltway was not discussed in the Draft EIS. Without objectively dealing with a Beltway Alternative, this Draft EIS is not credible.

6

7. Based on my experiences as a systems analyst, the Draft EIS's treatment of alternatives to the Build options lacks objectivity. Examples abound of systems analysts proving what was wanted to be proven. It is believed that objective analysis results will not be obtained without competent proponents conducting and reporting their results without any bias on the results desired being included with or in their task statement. (On the SRTC MIS for the Valley corridor, the contractor will utilize 3 or 4 different teams to work on the different transportation alternatives such as roadways, TSM, light rail, etc. in order to have a fair treatment of each alternative.)

7

8. In view of the 20 years projected for construction, the Final EIS should deal with issues in the time frame at least until NSF completion, i.e., year 2020. Global Warming is increasingly recognized by many scientists, foreign and domestic, as being quite well understood and is now a likely cause of the warming of the global atmosphere. Twenty-five percent of the primary Global Warming gas, carbon dioxide, produced in the world is generated in the US, and motor vehicles are responsible for about 60% of the US-generated carbon dioxide. Any forward-looking EIS on transportation by motor vehicles should recognize and, as a minimum, discuss the potential impact of significant issues such as Global Warming.

8

It is requested that this letter and appropriate responses be published in the Final EIS.

Sincerely,

Julian Powers

Julian Powers
Chapter Coordinator

Response

B-5 Spokane Area Good Roads Association (Dale Stedman)

1. The NSF study is funded through completion of the FEIS. No funding is provided beyond this environmental stage.

2. Alternate staging plans for the build alternative are being investigated. Additional environmental studies may be required if design or construction staging is revised.

Comment B-5

North Spokane Freeway Environmental Impact Study Comment Sheet

Please use this form to express any comments that you have concerning this project.

Name: SPOKANE AREA GOOD ROADS ASSOCIATION Date October 14, 1995
Attens: Dale F. Stedman, Secretary
Address: 107 W. 29th, Spokane, WA 99203-1710
Telephone: (509) 838-1994 (Fax- 509-458-0506)

Comments:

Either of the proposed routes for the North Spokane Freeway will serve Spokane citizens well with neither having any highly negative impacts.

We would encourage the Department to move ahead promptly with all required hearings and meetings in order that some immediate progress can be made should revenue be found for right of way purchase or necessary design work to satisfy the Federal requirements of the Environmental Impact issues. **1**

Spokane's North Spokane traffic movement is growing more difficult each day, a problem that has existed to one degree or other for more than 40 years, and if some progress on the proposed Freeway is not possible in a relatively short period of time, we would urge immediate studies as to possible alternatives to the proposed North Spokane Freeway, perhaps even a less costly facility in the same projected corridors. **2**

We, the Good Roads Association, will work with the Department of Transportation in any way you might suggest, to move this very critical issue forward.

Further, we appreciate the dedicated service of the DOT staff and commend them for the North Spokane Freeway work done and the work yet to be done.

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OCT 16 1995

HAROLD WHITE

Better Mobility Through Spokane

Response

Comment B-6

B-6 Ramm Associates

1. Comments noted.
2. Background information used in the development of the DEIS included potential impacts to this and all affected property based on current Zoning. As the Zoning is not being revised by the feasibility study and formal master plan, no additional impacts have occurred. Only after the site plan is approved and development commenced, would the additional on site impacts occur.

October 20, 1995

Harold White, P.E., Project Engineer
Washington State Department of Transportation
2714 North Mayfair Street
Spokane, Washington 99207-2090

RE: North Spokane Freeway
Draft Environmental Impact Statement (DEIS)

Dear Mr. White:

The enclosed comments are submitted on behalf of our client, Burlington Northern Railroad (BNR), regarding the alternative routes proposed for the North Spokane Freeway.

In 1994 Ramm Associates, Inc. completed an extensive feasibility study and formal master plan for development of an industrial park on BNR property in Hillyard. The 240 acre project site included all the industrial zoned BNR-owned property lying north of Wellesley Avenue, south of Lincoln Road, east of Market Street, and west of Freya Street. The Market/Green Alternative route proposed in the DEIS encompasses the majority of BNR's property. Construction of a freeway along this route would substantially impact the development potential of BNR's property and eliminate the opportunity for development of a mixed use industrial park as currently planned.

BNR is moving forward with development plans for the industrial park. Ramm Associates, Inc. is currently under contract with BNR for preparation of a preliminary binding site plan for the northern (north of Francis Avenue) portion of their site. Other approvals regarding utilities and public services to serve the site are currently in process, including annexation into the City of Spokane sewer service area, annexation into North Spokane Irrigation District's water service area, and potential annexation into Fire District No. 6. Assuming all these approvals are acquired, BNR plans to proceed with a final binding site plan for this property in 1996. BNR also plans to proceed next year with a request for preliminary binding site plan approval from the City of Spokane for their property south of Francis Avenue.

The feasibility study and master plan completed for the project site detailed its potential for development as a food processing/warehouse/distribution center geared toward rail-served tenants. As stated on page 1-2 of the North Spokane Freeway DEIS, "The current intermodal demand between rail and truck transportation has a strong expansion potential." In addition, development of a rail-based industrial park

LAND PLANNING AND DEVELOPMENT SERVICES

Suite 217, Lilac Flag Building • 104 South Freya Street
Spokane, Washington 99202 • 509/534-8086 • FAX 509/534-8159

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OCT 23 1995
SPOKANE, WA 99207-2090

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Response

Comment B-6 (Continued)

3. Comment noted. The preferred option is listed in the "Preferred Alternative" section of Chapter 2 in the FEIS.

Mr. Harold White
October 20, 1995
Page -2-

on BNR property would impact the surrounding area by providing increased employment opportunities, increased demand for housing and commercial services, and motivation for redevelopment of Hillyard's commercial and residential areas. 2

On behalf of BNR we request that the Market/Green Alternative route for the North Spokane Freeway not be selected as the preferred alternative. This request is substantiated by: (1) the development potential of BNR's property along the Market/Green Alternate route, (2) the fact that BNR is currently proceeding with formal approval requests for development of an industrial park, including environmental cleanup of suspected hazardous waste contaminated sites, (3) the overwhelming positive impact development of an industrial park would have on Hillyard and the surrounding area, and (4) the availability of an alternative route (Havana Alternative). 3

Thank you for this opportunity to comment on the DEIS for the North Spokane Freeway. Please contact us if you have any questions regarding the above or would like further information regarding BNR's plans for development of their property.

Sincerely,

RAMM ASSOCIATES, INC.



Patricia S. Idlof
Associate/Senior Planner

PSI:kdl

c. Steve Kuzma - Burlington Northern Railroad

Response

Comment B-7

B-7 Burlington Northern Railroad

1. Comment noted

2. The proposed Market/Greene alternative will conflict with the proposed BNR development plans. At this stage of the development, it is unknown to what extent impacts could be expected on the marketability and value of this property.



BURLINGTON NORTHERN RAILROAD

Burlington Northern RR
2100 FIC, 999 Third Ave.
Seattle, WA 98104
(206) 467-3490
Fax (206) 467-3443

October 20, 1995

Mr. Harold White
Project Engineer
Washington State Dept. of Transportation
2714 North Mayfair Street
Spokane, WA 99207-2090

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DEPARTMENT OF TRANSPORTATION

OCT 23 1995

SPOKANE, WA 99207-2090

Dear Mr. White:

Refer to your 9/11/95 letter regarding project FHWA-WA-EIS 95-4-D concerning the Draft EIS for the North Spokane Freeway.

Burlington Northern owns approx. 240 acres in Hillyard along the proposed Market / Green Alternative route discussed in the North Spokane Freeway DEIS. BN has made substantial progress toward development of its property as a rail served industrial park and construction of a freeway along this proposed route would eliminate the development potential of this property.

Ramm Associates, Inc. has completed an extensive feasibility study that included planning, engineering, marketing and financial analyses. The study developed implementation strategies and detailed a full master plan for the industrial park. BN is proceeding with the recommendations outlined in the study by requesting approval of a preliminary binding site plan for the northern portion in 1995 and the southern portion in 1996. Various hazardous waste remediation projects have been completed in preparation for future development of the site.

Along with the financial impacts, the possibility of a freeway through BN's property will severely impact future marketing plans for the industrial park. As long as the Market / Green Alternative remains a viable alternative, BN cannot successfully market the industrial park as proposed. The Railroad believes the proposed industrial park would have some very positive impacts on the surrounding community by providing increased employment opportunities as well as stimulating growth of the housing market and supporting businesses.

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Response

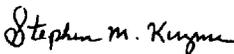
Comment B-7 (Continued)

3. Comment noted. The preferred option is listed at the end of Chapter 2 in the FEIS.

BN requests the North Spokane Freeway be constructed east of the proposed industrial park along the Havana Alternative route. The Market / Green alternative severely impacts BN's present / future development efforts and further eliminates the positive benefits of a high quality industrial park in the Hillyard community. 1

If there are any questions, please contact me at the above address. Thank you for your continued cooperation.

Sincerely,



Stephen M. Kuzma
Manager - Industrial Development

File: Hillyard - Spokane, WA

Response

Comment B-8

B-8 Hart Enterprises

1. The offer to purchase property from you in the Thor/Freya interchange area was predicated on the proposed improvements as detailed in the Environmental Impact Statement, I-90 - Four Lakes to Idaho State Line. The offer was not accepted and was therefore rescinded. It is expected that this study will supersede I-90; 'Four Lakes to Idaho State Line' study of improvements on I-90 between the Hamilton Street Interchange and Sprague Avenue Interchange. This project will need this property prior to construction of the interchange. Even if this project is not built, improvements to I-90, including adding lanes, and capacity improvements at the Thor/Freya Interchange will be required. Additional study and public input will be required prior to any other plans being implemented.

2. See Beltway/Bypass section of FEIS.

20768 VAN BARNHUIS
5661 9 2 107
MONTAGNE ROAD PROJECT
DRAFT EIS

**Hart Enterprises**
W. 1828 Riverside
Spokane, Wa. 99201
(509) 747-3859

October 24, 1995

Mr. Harold White, P.E.
WSDOT Project Engineer
2714 N. Mayfair Street
Spokane, Wa. 99207-2090

RE: Draft EIS NORTH SPOKANE FREEWAY

Dear Mr. White:

We attended the September 28, 1995 meeting held by WSDOT and received a copy of the draft EIS for the NORTH SPOKANE FREEWAY.

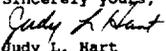
As requested by this EIS document, the following comments are submitted:

The Hart family owns 3.44 acres bounded by Third Avenue to the north, Thor Street to the east, Fourth Avenue to the south, and Ray Street to the west. Over the years, the Hart family has discussed this piece of property as it relates to the freeway system with WSDOT. In fact, WSDOT tendered an offer to buy our property and then rescinded that offer September 29, 1993. 1

The options included in the EIS report had as the number one option NO BUILD, which we concur with. The freeway systems proposed in the EIS, in our opinion, are too costly for the benefit. A better option would be a beltway around the city. In addition, we were informed that there is no funding to implement any options contained in the EIS except NO BUILD. 2

At this time, we are proceeding to build a much needed and wanted grocery store on our property which will directly benefit the neighborhood.

If further information is needed, please contact the undersigned and we will be happy to discuss our project in relationship to your proposed project.

Sincerely yours,

Budy L. Hart

WSDOT.EIS
cc: Leonard Cash, P.E. WSDOT
Mr. Charles Dotson, Planning Director
Mr. Todd Whipple, Inland Pacific Engineering

Certified P 433 222 928

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HAROLD WHITE, P.E.