refer to Guidance for Major Capacity Investments for a more detailed explanation of these distinctions. The SR 167, Puyallup to SR 509 project is included in Destination 2030 as a Conditionally Approved project, to allow land acquisition expenditures qualifying for “early acquisition,” as identified by Federal Highway Administration regulations in 23 CFR 710.501. Conditionally Approved projects must still satisfactorily address approved project criteria before being designated as Approved in Destination 2030.

**Process.** Destination 2030 includes a policy that enables the Executive Board to authorize a change in status of regionally significant projects from Candidate to Approved. Listed below is a summary of the requirements identified in the “Guidance for Major Capacity Investments” for moving a project from Candidate to Approved status.

1. Regional Council staff review and determine consistency of the project’s final preferred alternative with Destination 2030 policies.

2. Sponsor provides documentation for completed benefit cost analysis.

3. Environmental documentation is completed and submitted with sufficient detail as to the final nature, character, components or design of the given project or program to determine regional policy consistency.

4. Sponsor satisfactorily addresses any other planning requirements, which might have been specified by the Regional Council’s Executive Board for a given project.

5. Sponsor submits financial plan demonstrating project feasibility by showing how the entire corridor project or its individual project components are to be funded.

6. The project’s final preferred alternative is reviewed for consistency with the current Plan air quality conformity analysis, a new air quality Plan conformity may be required.

When a Candidate project meets the above requirements, the project sponsor(s) may request the Regional Council to change the project and associated supporting projects to Approved status.

In conclusion, the Regional Council would like to again thank the study team for their commitment to this project. If you have questions about our comments, please call me at (206) 464-7134 or Eli Cooper, Director of Transportation Planning at (206) 464-7122 or Kevin Murphy, Program Manager at (206) 464-6411.

Sincerely,

[Signature]

Norman Abbott
Environmental Officer

**RESPONSE L07-015**

Thank you for the updated information. We will include these steps in our process as the project moves forward.
April 14, 2003

Jeff Sawyer
Olympic Region Environmental Manager
Washington State Department of Transportation
5720 Capitol Blvd.
Tumwater, WA 98501
Fax: 360.357.2739

RE: FHWA-WA-EIS-2007-02-D
SR 167, Puyallup to SR 509
Draft EIS/Tier II

Dear Mr. Sawyer,

Thank you for the opportunity to review the above-noted EIS. Pierce Transit’s comments are included in the following paragraphs. These comments range from suggestions for simple grammatical changes to serious discussion of the scope of this EIS as it relates to transit facilities.

We would like to reiterate our ability and willingness to cooperate on this project as has been shown by our commitment to researching sites for potential park and rides and attending Pierce’s Committee meetings. We do note, however, that the SR 167 Park and Ride Study (completed by Pierce Transit and Sound Transit in June 2003) was submitted for your review and addition to the EIS has not been fully incorporated.

Page 1-17, in the first paragraph under the Stakeholder Interviews section, Pierce Transit is listed as “Pierce County Transit.” It should say simply Pierce Transit, as Pierce Transit (the PTBA) is not tied to Pierce County (the governmental organization).

Transit is specifically addressed beginning on page 3-279. Within this section, a number of Pierce Transit routes are listed as traversing this corridor. With the most recent service changes, this list has become outdated. For your information, Routes 400 and 405 are no longer in service. (This addressed the 2nd and 4th bullet.) The fifth bullet lists Route 500A as travelling between downtown Tacoma and Federal Way; however, there is no longer a Route called 500A. That service has been picked up under a new route, Route 501.

As regards the discussion of Park and Ride Lots (beginning on page 3-280).

There is a commitment to set aside land for park and ride lots listed in Table 1.3-2, Commitments and Mitigations. The EIS does not, however, include a specific environmental analysis of the proposed park and ride sites. The SR 167 Park and Ride Study includes detail that could easily be integrated into the EIS. This addition would create only a minor addition to the overall project cost. In our viewpoint, WSDOT is a multi-modal agency. You have here been a very strong supporter of park and ride development including several that we operate in cooperation with WSDOT. Generally, there is an ongoing deficit in available park and ride spaces, and the SR 167 Park and Ride Study identifies a significant demand well into the future. So, in our opinion, the integration of proposed park and ride lots listed in our study fits in well with this project. Omitting the full environmental analysis work for the proposed park and ride makes very little sense.

If full environmental analysis of the park and ride lots is left out of this EIS, a completely separate environmental process will have to be performed. The separate environmental analysis would be done at significant additional public expense. Further, if full analysis of the park and ride lots is not included, this would force you to take out the emphasis of the park and ride lots as part of the improvement of this corridor and will, we believe, remove them as mitigation measures included in the current version of the EIS.

Both NEPA and SEPA require environmental documents to look at the “big picture” of projects, including all their elements, rather than fragmenting them. Leaving full analysis of the recommended park and ride lots out of the EIS produces fragmentation.

Thank you for allowing us the opportunity to review this document. We hope that the above-noted concerns will be addressed.

Sincerely,

Kevin Desmond
Vice President of Operations and Development
C: Terrence Flaxton, Sound Transit

RESPONSE L08-001

The FEIS has been updated to include two park-and-rides, one at the Valley Avenue interchange and one at the SR 161 interchange, based on Pierce Transit’s July 2002 Park-and-Ride study.

RESPONSE L08-002

The FEIS is revised to include the correct name for Pierce Transit.

RESPONSE L08-003

The FEIS is revised to list the correct transit routes.

RESPONSE L08-004

The FEIS has been updated to include two park-and-rides, one at the Valley Avenue interchange and one at the SR 161 interchange, based on Pierce Transit’s July 2002 Park-and-Ride study.
RESPONSE L09-001

PSRC's traffic forecast was included in the traffic report for this project. PSRC's traffic modeling included traffic impacts from the proposed Canyon road project, as well as Port of Tacoma growth. For more detail please see the 2001, SR 167 Extension Final Traffic Report for Tier II EIS. Design details of the Canyon Road project are not currently available.

RESPONSE L09-002

For these types of roadways, intersections in the project area are the most critical locations to address. The intersections govern the level of service analysis.

RESPONSE L09-003

The FEIS Transportation section 3.14 utilized the 1996, Tacoma Tide Flats Circulation Study, which included circulation information for the Port of Tacoma and Fredrickson areas.

RESPONSE L09-004

Table 3.14-4 has been updated to include No Build travel times.

RESPONSE L09-005

The title of figure 3.14-1 is changed to “Regional Highway System.”
6. On Figure 3.14-6, it would be useful to show a traffic volume on the SR167 Extension between Valley Ave. and SR161.

7. The title of Figure 3.15-2 should be changed since many of the facilities shown do not exist today.

8. The following comments are related to bicycle and pedestrian travel through the proposed SR 167 Corridor:

A. Page 8-21 (Last Paragraph). The EIS explains that “bike and pedestrian users...would likely experience difficulties” at the 54th Avenue Interchange and other interchanges. The EIS also states, “Nonmotorized vehicles would be restricted on SR 167 from the 54th Avenue East interchange to 20th Street East. A separate multi use trail would be provided between 54th Avenue and SR 99.” It is agreed that the highway and interchanges will provide a nonmotorized facility only for experienced bicyclists confident in their ability to negotiate across high speed motor vehicle merge and exit ramps. A separate multi use trail that travels along a longer segment of the highway would provide a nonmotorized facility available to a much larger segment of the population. At a minimum, the separate multi use trail should be examined along the entire length between 54th Avenue East and 20th Street East where nonmotorized vehicles will be restricted.

B. Figure 3.15-1 is unclear displaying how nonmotorized users get to the East-West Road (SR 509) from the path that ends at 54th Avenue. Also, how nonmotorized users travel from the end of the path at SR 99 back to SR 167 Northbound. One potential means by which to address these concerns is to break Figure 3.15-1 into several diagrams showing the proposed nonmotorized route and facilities in detail.

C. Page 3-305 (Sixth Paragraph). The EIS describes a “new and improved 70th Avenue East overpass would allow users of the Interurban Trailhead to cross I-5 as before.” Will the “new and improved” overpass be improved with nonmotorized facilities? Providing a separate trail facility on the new 70th Avenue overpass would be the ideal method to connect the Interurban Trail to Tacoma. From Figure 2.5-3 it is not clear how a nonmotorized user connects from the Interurban Trail to the road system or how an Interurban Trail user crosses I-5 to get to the north and the path at SR 99? Based on the EIS, it seems that a southbound user of the Interurban Trail will have to go onto 20th Street East, travel through two, two-lane roundabouts, and cross I-5 on 70th Avenue to SR-99, and then travel on the shoulder of SR-99 for a short distance to reach the new Separate Trail. Perhaps an easier nonmotorized connection should be provided that avoids this new barrier to the Interurban Trail.

RESPONSE L09-006

Figure 3.14-6 is updated to include the traffic volume between Valley Avenue and SR 161.

RESPONSE L09-007

Figure 3.15-2 is updated to show the most current information.

RESPONSE L09-008

Section 3.15.6 Mitigating Measures (Pedestrian and Bike Facilities) of the FEIS describes the various measures that would be added to the project that would improve “Connectivity” for non-motorized travel. Impacts to existing bike connections are described in the FEIS. Mitigation will be determined prior to construction of the project.

RESPONSE L09-009

The locations of existing and proposed bike/pedestrian trails are shown on figure 3.15-2 in the FEIS.

RESPONSE L09-010

The new roadway cross section on the 70th Avenue Overpass includes sidewalks and a bike lane.
E. Figure 3.15-3 “Proposed Pedestrian and Bike Facilities by Local Jurisdictions” is also incorrect. Pierce County is unable to find a local proposed plan recommendation for the Hylebos Creek Trail or the Wapato Creek Trail. The Puyallup River Trail (North Levee Trail) is proposed to run on the north side of the Puyallup River west of 66th Ave E. The trail is proposed to run on the south side of the Puyallup River east of 66th Ave E. A portion of the Puyallup River Trail exists within the City Limits of Puyallup and should be shown on Figure 3.15-2.

F. The Interurban Trail shown on Figure 3.15-3 is a major regional facility owned by the City of Milton and is currently used by the public. More improvements are planned for the future including paving and connection to the existing paved Interurban Trail that travels to Renton from Pacific. This Interurban Trail at 70th Avenue should be shown as an existing trail in Figure 3.15-2.

G. Page 3-302 (Second Paragraph). The EIS discusses potential connections to the Puyallup Recreation Center. One sentence reads, “Historically, the Center has experienced very minimal levels of seasonal pedestrian and bicycle related traffic.” It should be noted that to reach the Puyallup Recreation Center from the City of Puyallup one must walk or ride a bike through the SR 161/SR 167 Interchange. There is currently no attractive route to get to the recreation center by bicycle or foot. The SR 167 corridor project could facilitate travel for providing good nonmotorized access to the recreation center from the City of Puyallup.

H. Page 3-305 (Third Paragraph). The EIS describes a developer planned overcrossing of the mainline between the Valley Ave Interchange and the Puyallup Recreation Center. It would be helpful to see this proposal on Figure 3.15-1 and more information provided on the possibilities for nonmotorized mainline access from this proposed overcrossing or access from North Levee Road.

I. Page 3-306. It is difficult to tell which Valley Avenue Interchange might be the best configuration for bicyclists. However, it seems that the Valley Avenue Realignment Option (Figure 2.5-13) may have an advantage over the other two options by not including a two-way exit and merge intersection on a local road. This may make negotiating the local road easier for the recreational or commuting bicyclist as well as pedestrians.
The Urban Option at the SR 161 interchange is the environmentally preferred option with the least amount of impact to adjacent properties. This option includes a crossing between Valley Avenue and North Levee Road. This crossing may provide a better route for bicyclists to travel to the Puyallup Recreation Center.

We appreciate the opportunity to comment on the Draft EIS for the SR 167 Extension Project. We hope the comments are of some value to the continuing review process for this important highway project. If you have any questions regarding these comments, please feel to contact Jesse Harashima, Transportation Planning Supervisor, at (253) 798-2760. Thank you.

Sincerely,

GARY N. PREDOEHLE, P.E.
Program Development Manager

GNP-ITHE

Cc: Thomas G. Ballard, P.E., County Engineer
Patrick D. Baughman, P.E., Consultant Eng./Environmental Supervisor
Shawn Phelps, Transportation Planner
Robert H. Vogel, Transportation Planner
Mike Mariano, P.E.
Jesse Harashima, Transportation Planning Supervisor
We will coordinate with the County regarding impacts to County owned utilities during final design.

Table 1-4 in the FEIS is a list of environmental permits and approvals. Construction permits have not been listed in this table. WSDOT will work with the County during design and construction of the project on the relocation of County utilities.

WSDOT will coordinate with the County during final design on coordination of relocating the interceptors in question.

WSDOT will coordinate with the County on this issue during design and construction of the project.
interceptor in this area is approximately 8 to 7 feet deep and carries
approximately one million gallons per day of raw sewage. The line currently is a
gravity line and, depending on the depth of the creek, gravity service may be
impacted. In addition, Pierce County Public Works and Utilities, Environmental
Services Division, has requested that the WSDOT remove the excess fill material
placed over the interceptor last year. That excess fill material could severely
impact the interceptor as it was not designed to handle the additional dead load
and the Sewer Utility would like the material moved as soon as possible.
Page 3-21B. There are some discrepancies in the mapping at and north of the
Interstate Highway No. 5 intersection. We are providing assessor’s maps
identifying the size and approximate locations of Pierce County’s sanitary sewer
system within the limits of the subject project.

This concludes our specific comments on the subject document. Pierce County
Public Works and Utilities, Sewer Utility, is supportive of the proposed project
and is more than willing to work with the WSDOT to minimize impacts to the
operation and maintenance of our existing sanitary sewer facilities.

Should you have any questions or require further information, you may contact
me at your earliest convenience. My direct telephone number is 253-798-4144.

Sincerely,

ROBIN R. ORDONEZ, P.E.
Supervisor of Engineering

Endorsements

cc:  Dan Mathis, Division Administrator
    711 South Capitol Way, Suite 501
    Olympia, WA 98501
    Neal J. Campbell, Project Engineer
    Washington State Department of Transportation
    P.O. Box 47447, Olympia, WA 98504-78446
    Steve Saxton, Area Engineer
    Federal Highway Administration
    711 South Capitol Way, Suite 501
    Olympia, WA 98501
    Brian Stacy, P.E., Wastewater Utility Manager
    Pete Philley, Pierce County Deputy Prosecuting Attorney
    Bill Murphy, Wastewater Utility Collections System Manager

RESPONSE L10-005

Figure 3.10-8 is updated to show locations of Pierce County’s sanitary sewer
system in the project area.

From: Harold Smalt[mailto:HSmalt@co.pierce.wa.us]
Sent: Monday, March 10, 2003 9:14 AM
To: campbem@wsdot.wa.gov
Subject: SR 167 Extension

Thanks for the updated mailing on the SR 167 extention. I’ll be sure to review the documents
available at our Planning and Land Services Division.

Just a reminder that Pierce County Water Programs owns significant tracts of land along the
Hybleos in the vicinity of the proposed interchange with I-5 and I would appreciate being kept
current on any plans that may impact this property. I’m assuming that there will be wetland
and habitat mitigation needs for a project of this size and I realize our sites may be the best
location to do that mitigation work. Let me know if you are thinking along those lines.

Thanks.

Harold P. Smalt, P.E., Capital Improvement Program Manager
Pierce County Water Programs
9860 - 64th Street West
University Place, WA 98467
(253) 798-6202 Fax (253) 798-7709
hsma1t@co.pierce.wa.us
http://www.piercecountywa.org
03/13/03

RESPONSE L11-001

WSDOT will continue to work collaboratively with Pierce County Water
Programs.