

The project's lead agencies (Pierce County, WSDOT, and FHWA) received public and agency letters and oral testimony on three documents that have been distributed for public review. The documents are the DEIS (1998), Additional Studies (1999), and SDEIS (2002). In total, 221 letters or testimonies have been received, containing 925 separate comments. Public comments were received from individuals, community groups, businesses, private organizations, and federal, state, and local agencies. Public meetings were held in the project vicinity shortly following publication of the DEIS and SDEIS. Court reporters were available at the meetings to accept oral testimony, and forms were provided for written comments.

Volume 3 of this FEIS includes copies of all letters, comment forms, and oral testimony received on the three documents distributed for public comment. Each comment letter, form, or transcript has been numbered, as has each specific comment. Volume 3 includes responses to each comment. Many comments addressed similar topics or issues. These have been summarized in this chapter of the FEIS, and a general response has been provided.

## **6.1. Project Alternatives and EIS Process**

**Comment:** The purpose and need statement of the document is restricted to making the physical link between Spanaway and Lakewood. The priority should be on regional transportation and an analysis of whether the highway meets the goals of the County's Comprehensive Plan goals.

**Response:** The purpose and need statement comply with the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 CFR 1502.13) and FHWA's Environmental Impact and Related Procedures (23 CFR 771), and was developed in accordance with FHWA guidance (FHWA Technical Advisory T6640.8A and FHWA memo dated September 18, 1990). The DEIS and FEIS provide sufficient information for the decision at hand, including the purpose and need for improvements; reasonable alternatives; affected environment; direct, indirect, and cumulative impacts; and mitigation measures. The EIS includes evaluations of how the project works from a regional transportation perspective and its consistency with Pierce County's Comprehensive Plan.

**Comment:** A range of alternatives is required by NEPA. None is offered for the section of the Cross-Base Highway project between Pacific Avenue and Lake Mondress.

**Response:** NEPA and corresponding regulations by the CEQ and FHWA require consideration of reasonable alternatives that could satisfy the underlying need for and purpose of a proposed project and actions. The range of alternatives evaluated during the planning process for the Cross-Base Highway project included a suite of elements such as improvements to other roadways and a variety of transportation demand management (TDM) and transportation system management (TSM) strategies that attempt to address the need for the project and avoid construction of a new roadway in the project area. A variety of Build Alternatives were developed

that address both the purpose of the project and the need for the action by construction of a new roadway.

In the broadest sense, corridor alignments were considered as far north as SR 512 and as far south as the Nisqually River in Thurston County. However, due to the existence of Fort Lewis and McChord AFB in this entire area, the corridor where a new Cross-Base Highway project could be implemented without causing substantial impacts narrows to an area between the two military installations. Commanders from both Fort Lewis and McChord AFB have made it clear since the mid-1980s that a new Cross-Base Highway project corridor in this area was possible, but only if the alignment was as close as possible to the existing boundary between the two military installations. Where corridor alignments would interfere with current military activities or substantially constrain future use, Fort Lewis and McChord AFB have stated easements would not be granted.

In addition to military constraints, there are other reasons for such a narrow project corridor. This corridor location minimizes impacts to important natural environment areas such as Spanaway Marsh. The project's eastern terminus at SR 7 in the vicinity of 176th Street S creates the opportunity for Pierce County to ultimately complete a long-distance improved east-west travel corridor between I-5 and Orting in Pierce County through a series of independent improvements consistent with the County's overall Transportation Plan. A corridor-level SEPA EIS has been completed on extending 176th Street E between SR 161 and SR 162 in Orting. Because of military and natural environment constraints, the eastern terminus of the new Cross-Base Highway project could only occur in the vicinity of 176th Street S at the intersection with SR 7.

**Comment:** Please study alternatives to constructing a major new highway. Improvements to existing routes should be considered.

**Response:** This document is a combined EIS/MIS that considers a reasonable range of alternatives, as required by NEPA, following processes established by the Intermodal Surface Transportation Efficiency Act (ISTEA) and the Transportation Equity Act for the 21st Century (TEA-21). The MIS portion of the document considers a wide range of actions and screens them to arrive at a set of reasonable and feasible alternatives for detailed examination in the EIS portion of the document. The presence of McChord Air Force Base and Fort Lewis limit the range of reasonable and feasible build alternatives.

The MIS analysis includes a TDM/TSM Alternative that is compared to Build Alternatives at a corridor level. The TDM/TSM Alternative includes additional improvements to existing roadways and expanded programs to reduce transportation demand. The TDM/TSM Alternative was analyzed for its ability to meet the purpose and need for improvements and feasibility, including potential impacts. The TDM/TSM Alternative was considered but rejected because it has such substantial impediments to implementation that it is not a reasonable alternative (see the response to letter F3, comment 20 and Section 2.3.1 of the FEIS). According to the CEQ, "Reasonable alternatives include those that are practical or feasible from the technical and economic standpoint, using common sense, rather than simply desirable from the standpoint of the applicant" (Forty Most Asked Questions Concerning CEQ NEPA Regulations, Number 2a).

The implementation difficulties of high occupancy vehicles (HOV) facilities on SR 7 and Canyon Road E, commuter rail service on the Tacoma Rail Line, and widening of Spanaway Loop Road would significantly affect the viability of the TDM/TSM Alternative. Furthermore, the TDM/TSM Alternative assumes that the goals for the Commute Trip Reduction Act (CTR) would be achieved for all employers, not just those with more than 100 employees. This is an unrealistic assumption because achieving this CTR goal for all employees would be difficult even with a substantial unplanned investment in transit infrastructure.

Programmatic elements of the TDM/TSM Alternative, such as mandated parking charges for single occupancy vehicles (SOVs) and extending the Commute Trip Reduction Act to all employers, would require legislative action and are not under consideration at the state or local level of government. Without these strategies, the TDM/TSM Alternative performs no better than the No Build Alternative and does not meet the purpose and need of the project. Even if these TDM/TSM strategies were feasible, the TDM/TSM Alternative would not improve connectivity or movement of freight and goods.

FHWA supports TDM/TSM strategies, but implementation on a regional basis is a local decision. Without these facility improvements in place, the estimated congestion reduction benefits of the TDM/TSM Alternative would be substantially lower due to the lack of transit infrastructure. Further, the TDM/TSM Alternative does not provide the sufficient improvement to fulfill the underlying purpose and need for the project including congestion reduction, connectivity between urban and employment centers, improvements in freight and goods movement, and public transit access between mid-Pierce County and I-5. Hence, it was rejected for more reasons than just system linkage.

**Comment:** Because the project has been delayed and new information has been developed, a revised DEIS should be issued to give the public and agencies the opportunity to comment on the project.

**Response:** After the FEIS is published, comments will be accepted for 45 days, the same period provided for the DEIS. During this time, public meetings will also be held to present the project and give additional opportunities for comment. The record of decision (ROD) will respond to comments received on the FEIS.

## 6.2. Project Design

**Comment:** No facilities are provided for safe movement of bicycles, even though the route is designated as part of the County's Non-motorized Transportation Plan.

**Response:** Bicyclists would be able to use the shoulders of the new roadway, although security concerns by Fort Lewis and McChord AFB preclude a separate or signed bicycle route. The shoulders are designed to established guidelines for safe bicycle travel. This will improve regional non-motorized travel, as stated in the purpose of the project.

**Comment:** There is no pedestrian access from Tillicum to and from American Lake Gardens.

**Response:** The Thorne Lane interchange area at I-5 has been revised to improve bicycle and pedestrian access and includes non-motorized facilities on the new interchange structure connecting American Lake Gardens with Tillicum. See Section 2.4.2.2 in the FEIS.

### 6.3. Community Impacts

**Comment:** A thorough analysis of how the proposed project will affect the rate and distribution of growth in the region is both warranted and necessary, to fully understand the effects of the project.

**Response:** The Pierce County Comprehensive Plan, which established the Employment and Manufacturing Centers in unincorporated Pierce County, including Frederickson, was developed in compliance with the Washington State Growth Management Act (GMA) and approved for consistency by Puget Sound Regional Council (PSRC). The Cross-Base Highway project responds to the need for a highway based on the Comprehensive Plan. The highway would not result in additional development beyond what is projected for planned growth. Therefore, although the project could affect the rate of growth consistent with the Pierce County Comprehensive Plan, the overall type and intensity of development would not be directly affected. Refer to the revised secondary/cumulative impacts section of the FEIS, Section 4.20.

**Comment:** Regardless of the alignment through American Lake Gardens, the highway will disproportionately impact this minority and low income community. There appears to have been no effort to perform outreach and ensure public participation commensurate with this condition.

**Response:** The Environmental Justice section was updated with 2000 Census Bureau Data, and the data confirms that the block groups along the Cross-Base corridor have higher percentages of low-income populations than the Pierce County average. Additional public outreach targeting Environmental Justice populations and people affected by the project was conducted from March to June 2003, and more details on public participation and comment are provided in Section 4.11.1.1 of the FEIS than were provided in the DEIS. The FEIS includes updated analyses on air quality, noise, and visual resources. These analyses are considered and summarized in the Environmental Justice section.

**Comment:** The highway, as proposed, will cut the Woodbrook Hunt Club off from our hunt territory. The equestrian community will be blocked from using riding areas used for over four decades.

**Response:** Fort Lewis' existing policy on access for recreational activities, including equestrian use or "riding to the hounds," will not be changed by the new roadway. This policy requires prior permission and entry through an established gate. There are many examples of equestrian businesses operating successfully without direct access to parks or other open space. The highway will be a barrier to continued direct access by equestrians. As well, if Fort Lewis enforced its stated policy or installed security fencing in this area, equestrian access would also be cut off.

**Comment:** The new highway will increase noise levels and impact nearby residents and other activities.

**Response:** Noise levels will increase near the new highway, and mitigation will be provided in those areas deemed reasonable to reduce noise to acceptable levels (see section 4.8). In American Lake Gardens under the preferred alternative (South A), noise barriers will be provided on both sides of the roadway so activities at Woodbrook Middle School, the ball field, and along Murray Road SW won't be affected. Along the southern boundary of American Lake Gardens, noise barriers will also be provided to reduce impacts to residents and equestrian businesses. In the Spanaway area, noise barriers will be provided along most of 176th Street east of SR 7, however noise barriers to reduce impacts to residences along 169th Street S are not proposed because they do not meet WSDOT reasonableness criteria for cost and benefit.

## 6.4. Natural Environment Impacts

**Comment:** This project will result in negative impacts to one of Washington's rarest and most endangered native ecosystems, the Puget Trough prairie landscape.

**Response:** The proposed Cross-Base Highway project will affect a variety of vegetation cover types (see Section 4.6 of the FEIS). None of the areas affected by the project are quality prairie habitat; most of the grasslands are non-native. The alignment was purposely placed to avoid wetlands. The Douglas-fir forest habitat is all second-growth; most is in even-aged stands with little structural diversity and is considered to be invasive to oak woodland and prairie habitats. The grassland habitats with some native prairie species intersected by the proposed alignment occur at two locations. The first is a mowed field with few native plants west of Lake Mondress that is also heavily used as a practice arena by equestrian enthusiasts. The second location is southeast of Lake Mondress, where the alignment skirts the northern edge of a prairie habitat mostly invaded by Scot's broom. The intersection point is at a disturbed railway junction. Both locations support remnant patches of degraded prairie habitat. The remaining areas are disturbed fields dominated by weedy Scot's broom. In summary, the project does not affect grasslands or prairie of the type referred to in this comment.

The roadway would pass within 1,500 feet of wetlands supporting water howellia. However, it would not have any significant effect on these areas because all surface water runoff will be directed to infiltration basins and the relatively small amount of water that would be redirected would have only a very localized effect. The nearest infiltration basin to a wetland is over 4,000 feet from the nearest wetland with water howellia, and professional hydrologists have already determined that the project will not affect the hydrology at wetlands associated with water howellia.

A variety of mitigation measures are proposed for this project, most notably acquisition and management of a large site near Roy, Washington. See the response to the common comments on wildlife mitigation below.

**Comment:** North-south movement for medium and large size mammals that use these habitats, such as black bear, bobcat, deer, and coyote, would be prevented.

**Response:** North-south movements of larger wildlife species are already prevented by fences (cyclone) occurring around the perimeter of McChord AFB. The highway will further prevent these movements.

**Comment:** The highway would bisect the documented habitat of the western gray squirrel.

**Response:** The regional western gray squirrel habitat assessment (Section 4.6.3.3 of the FEIS) indicates that less than 5 percent of the forested and Oak cover on the two military bases would be north of the new roadway. Consequently, it is inaccurate to state that the proposed highway would bisect the squirrel's habitat.

**Comment:** Mitigation for impacts to wildlife and habitat, especially to western gray squirrels, is insufficient.

**Response:** Mitigation for wildlife and habitat impacts from the proposed highway have been refined since the DEIS. These are described in detail in Section 4.6.4 of the FEIS and the Roy Mitigation Site Management Plan (Attachment F to Appendix K). Overall, the mitigation approach will minimize direct impacts in the project area to the extent possible as well as providing additional offsite habitat. This plan is based on the off-site mitigation approach and goals developed through discussions with Pierce County, WSDOT, WDFW, DNR, and FWS. The mitigation focuses on the state threatened western gray squirrel and Oregon white oak woodland. In addition, the proposed mitigation has the potential to benefit native prairie and wetland habitats and species that have historically been associated with Oregon white oak habitats in Western Washington.

Mitigation through acquisition and management of oak habitat is the preferred goal. Initial screening of potential mitigation sites was conducted using GIS data, as well as published reports, and site investigations. This initial screening resulted in the decision to focus on a relatively large area of potentially suitable habitat in the vicinity of Roy. The approximate size of the mitigation area is 345 acres, of which approximately 100 acres are wetland area and approximately 45 acres include oak habitat.