

failure to include such information in the preliminary environmental impact statement is a major shortcoming. It would be inappropriate to issue such survey and analysis for the first time with the final EIS; they should be issued as a supplement to the preliminary EIS and the preliminary EIS comment period extended as necessary to permit thorough review by interested parties, including the City of Fife.

15. **Pg 3-17** The fourth full paragraph should be revised to indicate that offsite runoff was considered. The proposed stormwater management concept will mix SR 167 runoff with offsite runoff in the Surprise Lake Outlet and Hylebos Creek. While DOT is not obligated to clean the runoff entering the highway corridor, the condition of such runoff should be considered in evaluation of the efficiency of the stormwater treatment concept.
16. **Pg 3-18** The first paragraph should also mention the Fife Ditch, which is tributary to Hylebos Waterway.
17. **Pg 3-19** Second full paragraph should address the impact of the failure to dredge the Puyallup River. What mitigating measures might be necessary? Would any such measures impact SR 167?
18. **Pg 3-21** First full paragraph should be revised to indicate that Fife Ditch is tributary to Hylebos Waterway, not Hylebos Creek
19. **Pg 3-22** The first paragraph of the "Hylebos Waterway" section should be revised to indicate that the waterway receives runoff from "the surrounding industrial area". The tide flats were filled decades ago. The drainage area should be stated
20. **Pg 3-23** The first paragraph of the "Surprise Lake Drain" section should include a statement of the drainage area. The second sentence of the second paragraph of this section should be revised to read: "That portion of Surprise Lake Drain west of Freeman Road East has been maintained as an agricultural ditch." The Drain "resembles" a ditch because it has been maintained as such.
21. **Pg 3-24** The second full paragraph, second line, should be revised to read "Hylebos Waterway" rather than "Hylebos Creek".
22. **Pg 3-25** A new paragraph (or more) should be added to the bulleted list at the top of the page to describe flood control impacts. The proposed riparian restoration program would include a conscious decision to allow large woody debris to accumulate in the stream channels. The initial design should include a substantial increase in stream capacity, so that all anticipated loss of capacity, due to such debris accumulation, would not reduce capacity below that needed to carry storm flows to Commencement Bay without increased flooding of properties outside the

L04-055

L04-056

L04-057

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RESPONSE L04-056

The information provided in section 3.2 has been updated to reflect the fact that the entire section of the Surprise Lake Drain channel, from its confluence with the mainstem of Hylebos Creek to the crossing at Freeman Road will be restored to improve the quality and condition of the stream, provide flood control, and habitat benefits.

RESPONSE L04-057

Section 3.2.2 of the FEIS has been revised.

RESPONSE L04-058

Sediment buildup in the Puyallup River is discussed in section 3.2.2 of the FEIS.

RESPONSE L04-059

Section 3.2 of the FEIS has been revised.

RESPONSE L04-060

Section 3.2 of the FEIS has been revised.

RESPONSE L04-061

Section 3.2.2 – Surprise Lake Drain has been revised to indicate that it is an agricultural ditch.

RESPONSE L04-062

Fife Ditch drains into Hylebos Creek estuary which drains into Hylebos Waterway.

RESPONSE L04-063

The relocated stream channels will be longer than the existing channels and affected constriction points will be eliminated or modified.

SR 167 corridor. The flood impacts on the area north of 8th Street East should be addressed.

23. **Pg 3-31** The second full paragraph, 11th line, should be revised to reflect the correct name of Drainage District 23. There is no “Fife Drainage District”, as such.
24. **Pg 3-39** The areas discussed should include separate specific provision for the Hylebos Creek reach north of 8th Street East.
25. **Pg 3-40** The first paragraph, ninth line, should be revised to reflect new survey and hydraulic modeling, such that “Assuming” can be deleted and real data can be inserted.
26. **Pg 3-75 thru 3-79** The first line of Section 3.3.5 includes the statement that “There would be no net loss of wetland function or area as a result of this project.” In fact, there would be a substantial increase in wetland area as a result of the riparian restoration of the Surprise Lake Drain and of Hylebos Creek. The Surprise Lake Drain riparian restoration will convert a substantial area of active agricultural land, zoned for industrial and commercial development, into wetlands. While the Hylebos Creek riparian restoration east of I-5 is in an existing degraded wetland, most of the riparian restoration west of I-5 is in a developed area, in which the first step of the restoration effort will be the demolition of existing homes and businesses. The DOT should take credit for the wetlands created by these efforts.

The DOT should also address that portion of Hylebos Creek north of 8th Street East, where property acquisition and riparian restoration will be necessary to provide the flow capacity necessary to carry runoff from the project through many decades of future accumulation of large woody debris. Additional wetlands should also be created north of 8th Street East, and credit for such wetlands should be reflected in calculation of mitigation needs.

The riparian restoration wetlands are in the Surprise Lake Drain and Hylebos Creek watersheds, most impacted by SR 167 construction, so those new wetlands are more appropriate for mitigation of SR 167 construction impacts than the proposed mitigation area, which is in the Puyallup River watershed. Similarly, to the extent that wetlands in the Wapato Creek watershed must be impacted, they should be mitigated in the Wapato Creek watershed, and impacts in the Puyallup River watershed should be mitigated in the Puyallup River watershed.

Impacts in the Puyallup River watershed are outside the City of Fife, so any wetlands mitigation in the Puyallup River watershed should be outside the City of Fife.

L04-063

RESPONSE L04-064

Section 3.2 of the FEIS has been revised.

L04-064

RESPONSE L04-065

Hylebos Creek north of 8th Street East is described in section 3.2.2 under “Hylebos Basin.”

L04-065

RESPONSE L04-066

We have completed a comprehensive analysis of the project’s effects on hydrology, hydraulics and geomorphology to ensure that we address these impacts. The FEIS has been revised to include this information.

L04-066

RESPONSE L04-067

The Riparian Restoration Proposal (RRP) is proposed in the Hylebos Creek and Wapato Creek sub-watersheds as stormwater flow control management. Because this is intended for stormwater flow control, it can not be used as wetland mitigation also. The FEIS has been revised to clarify this site-specific stormwater flow control proposal and the additional benefits to existing degraded wetland areas. Please see section 3.2.3 of the FEIS.

The FEIS has been updated to include several potential wetland mitigation sites, some of which are within the City of Fife. No potential wetland mitigation sites have been identified north of 8th Street East. Please see section 3.3.7 of the FEIS for additional information. Please also see response to comment L04-047, above.

L04-067

RESPONSE L04-068

The maps (figures) have been revised in the FEIS.

RESPONSE L04-069

There are no air quality standards for construction, only operation of a project. We do not model construction emissions because they are such a relatively brief event within the scope of the operation of the project that their impacts will be negligible. We do outline steps that should be taken by the contractor to minimize emissions of construction equipment.

27. **DEIS S-17** It appears that the label for the Hylebos Creek sub-watershed is actually mislabeling the Wapato Creek as the Hylebos Creek. This is true for all maps with this labeling.

28. **DEIS S-20** Identify air quality standards that will be effected during construction.

29. **DEIS 1-12-14 Table 1.3-2**Noise (Sound Analysis) – The City of Fife needs to be consulted as well. WSDOT needs to commit landscaping and noise abatement to ALL residents in this area, not just tribal members. Visual – Landscaping measures should be consistent with Fife requirements in this area. Public Services and Utilities – The well impacts include the primary well that serves the City of Fife. Transportation - Degradation of roadbed life expectancy of roads needs to be calculated mitigated. The City of Fife should needs to be included in park and ride discussions. Ped. and Bike facilities – The SR 167 project needs to be consistent with Fife’s Parks and Rec. and Transportation Comprehensive plans.

30. **DEIS 2-5** If a frontage road is not required, is 8th Street East to remain open? He WSDOT response to the specific design criteria states “The mainline will cross over all roads”. This indicates none will have to be closed. As impacts of fills and bridges are still being studied as part of the Tier II EIS, they should be extended to eliminate the realignment of 20th St E around the I-5 interchange as portrayed. Will the added flood storage of the Hylebos Creek restoration be adequate for the amount of additional flood storage required?

31. **DEIS 2-37** Storm Water Treatment Proposal Plan – this storm water proposal must adhere to the City of Fife Storm Water Comprehensive Plan requirements. Any SR 167 drainage added to the storm water systems has to address the pump station upgrade requirements.

32. **DEIS 2-39** The City well appears to be included within a riparian restoration area.

33. **DEIS 2-41** This figure calls out “deep fill median infiltration”. Other earlier sections of the report identify the need for further geotechnical investigation of the roadway fill section regarding the possibility of liquefaction. The medial infiltration is not consistent with the earlier concerns.

34. **DEIS 3-53** The term “flood prone” is used based on aerial photos from 1990 and 1996 floods. Define the term “flood prone”.

L04-068

RESPONSE L04-070

We will continue coordinating with the City on issues that could affect the City throughout final design and construction. One noise abatement structure is proposed on Tribal land within the City of Fife.

L04-069

RESPONSE L04-071

L04-070

A portion of 8th Street East and 62nd Avenue East will be closed. Also, it is not possible to keep 20th Street East in its current alignment due to the complexity of the I-5 interchange. A detailed hydrologic analysis of Hylebos Creek was completed to further assess the Riparian Restoration proposal against stormwater control needs. The study results clearly demonstrate that the Riparian Restoration proposal meets or exceeds stormwater detention goals, including substantially reducing flood levels and inundation areas.

RESPONSE L04-072

L04-071

The stormwater treatment systems proposed either meet or exceed the City of Fife's Storm Water Comprehensive Plan requirements. The existing problems with the Fife Ditch pump station were described in the detailed hydrologic analysis done for the lower Hylebos (MGS et al. 2004).

RESPONSE L04-073

L04-072

The City well is on a parcel that is already fenced and located on high ground (out of the floodplain and erosion hazard zone). If access can be provided without jeopardizing the function of the riparian buffer in this area, then consideration will be given to exempting the well and associated buildings from the RRP. If this is not the case, other mitigation will be negotiated with the City of Fife.

RESPONSE L04-074

L04-073

Further testing of this treatment method is planned to both evaluate its use as a stormwater treatment practice and to address stability issues. If it is determined that deep fill infiltration is not feasible, more traditional stormwater control facilities (e.g., detention ponds) will be used.

L04-074

RESPONSE L04-075

L04-075

The term “flood prone” areas was used in the DEIS to make a distinction between the actual mapped floodplain as defined by FEMA and the more extensive area that has recently experienced flooding (i.e. the 1990 and 1996 flood events). However, the FEIS also relies on hydrologic analysis based on computer simulations to predict the 100 year floodplain under existing and future conditions for both Hylebos and Wapato Basins.

35. **DEIS 3-59** The City of Fife drainage systems rely on pump stations to release storm water. The pump stations need to be located and identified on the map.
36. **DEIS 3-61** The Sr167 wetland mitigation site needs to be removed as identified on the map. The site is part of an agreement with the Puyallup Indian Tribe, City of Fife and the Union Pacific Railroad. The Frank Albert Grade separation, the closing of the 54th Ave E at-grade railroad crossing and the construction of the "Frank Albert Connector Road" are all predicated on the need of the Union Pacific Railroad constructing roughly a two mile long side track in this area.
37. **DEIS 3-76** Define how the wetlands along the SR 167 route are degraded.
38. **DEIS 3-77** The ground water hydrology needs to be further investigated before the site should be chosen as the sole wetland mitigation location.
39. **DEIS 3-78** The WSDOT plan calls for the levee to be breached in three locations. The effect of this breach needs to be discussed in much more detail. The elevations of the flood waters, the property effected and to what extent? Detail the water elevation compared to the elevation of the railroad tracks.
40. **DEIS 3-161** A new multi-family development has been constructed just west of the 20th Street and 70th Avenue East intersection. The effect of noise on this development needs to be identified.
41. **DEIS 3-203** The utility impacts and mitigation shall adhere to the City of Fife codes, including the undergrounding of all relocated overhead utilities.
42. **DEIS 3-219** The Major Stormwater Lines figure needs to be updated to include major drainage areas, including ditches. Fife has few major drainage ditches that are piped, but are intergral to the City system and will be impacted by the project.

Recreation Comments

1. **Section 3-15** In general, I find a good deal of the narrative concerning the City of Fife to be out of date. Much of it refers to the plans associated with Fife's 1996 Comprehensive Plan, and it does not take into account the Parks, Recreation & Open Space Comprehensive Plan adopted in 2002. The trail planning in the earlier document was considerably revised and fine-tuned in the Parks Comp Plan. Consequently a number of the trails depicted on pages 3-310 and 3-311 are incorrect. The trails either do not exist as depicted, or they are not in fact proposed. The regional

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L04-084

RESPONSE L04-076

Pump stations are not shown on the FEIS figures. However, WSDOT will coordinate with the City on any impacts to utilities.

RESPONSE L04-077

The FEIS describes the several alternative wetland mitigation sites, including the Union Pacific Rail Road (UPRR) site, as presented in the SR 167 Conceptual Mitigation Plan, February 2005.

RESPONSE L04-078

The quality of wetlands along the SR 167 route are described by the Washington State Department of Ecology ratings and the wetland functional assessment found in the Wetland Discipline Report, WSDOT May 2005.

RESPONSE L04-079

WSDOT did not have permission from UPRR to monitor groundwater hydrology or delineate this potential mitigation site as identified in the SR 167 Conceptual Mitigation Plan. Any site or combination of sites proposed in the Final Mitigation Plan will include wetland delineations and characterizations of groundwater hydrology. Please see section 3.3.7 of the FEIS.

RESPONSE L04-080

These types of details will be developed in the Final Wetland Mitigation Plan, if a mitigation site with the potential to develop off-channel habitat for the Puyallup River is acquired.

RESPONSE L04-081

The area just west of the 20th Street and 70th Avenue East intersection was evaluated for a noise wall in the original report. A substantial portion of the noise reaching the receivers is from I-5 and SR 99 and local traffic along 70th and 20th Avenues.

RESPONSE L04-082

WSDOT will coordinate with the City on this issue during design and construction of the project.

RESPONSE L04-083

Figure 3.10-9, Major Stormwater Lines is revised in section 3.10 of the FEIS to include major drainage ditches.

trail system is not reflected accurately. For example, the North Levee Trail should be shown crossing the Milroy Bridge, then east to Puyallup, and not continuing east on Levee Road as depicted.

The primary concern with respect to impacted non-motorized transportation systems is relative to the Interurban Trail and the planned trails on 70th Avenue E. There is insufficient detail to understand how the project proposes to make these connections, however it is implied that it is WSDOT's intent to ensure that the linkages are made.

The proposed 20th Street E northern loop and roundabout design would significantly impact the proposed soccer complex that is under discussion at the North East corner of the 70th Avenue East and 20th Street East intersection the loop would take it through this property in such a way as to take nearly a third of the site. The City intends to see the loop eliminated. The project also proposes to meander a relocated Hylebos Creek through that same property. As proposed in the detail, this would clearly conflict with the use and layout of that site for soccer fields.

2. **DEIS 2.5-2** Why is the 10-foot bike path elevated? The elevation simply requires additional land and project footprint. The SR 167 cross section does not include HOV lanes. The section should be adequate enough and build to accommodate them in the future. The fill elevation for the mainline should be identified.
3. **DEIS 2-28** The terminus of the bike pat is not shown. It needs to match the Fife Parks and Rec. Plan.
4. **DEIS 3-239** The separated bike lane design, on a fill section, adds ROW to the total required for the project. If the final design minimizes the need for ROW, the bike lane design and location needs to be evaluated.
5. **DEIS 3-281** Some bike and pedestrian facilities have been planned, approved and constructed. This section needs to identify those already constructed and those planned for in the transportation and Parks and Rec Plans.
6. **DEIS 3-299** The pedestrian and bike facilities need to meet the requirements of the City of Fife Parks and Rec. and Transportation Comprehensive plans.
7. **DEIS 3-319** Secondary impacts and cumulative impacts to the City's transportation, water, sewer, storm water, and Park and Rec. facilities should be mitigated in accordance the corresponding comprehensive plans or elements adopted by the City.

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L04-090

RESPONSE L04-084

The figures in section 3.15 of the FEIS have been updated to reflect the correct information. Since the DEIS was published in February 2003 we have worked extensively with the City of Fife to coordinate design efforts in the project area near the proposed soccer complex. Through this coordination, we have found a solution that will work for both WSDOT and the City's soccer complex. The Interurban Trail will maintain a westerly connection to 70th Avenue East.

RESPONSE L04-085

The bike path is elevated because it was placed on top of the back swale of the stormwater ditch adjacent to the freeway. This design serves a dual purpose and limits the amount of total right-of-way required in this area. HOV lanes are not shown on the DEIS figure 2.5-2 because the project will not include HOV lanes between SR 509 and I-5.

RESPONSE L04-086

The SR 99 terminus is shown on sheet xx in Appendix A of the FEIS. It is in accordancw with the City of Fife Parks and Recreation Plan (date).

RESPONSE L04-087

Please also see response to L04-085.

RESPONSE L04-088

The FEIS has been revised to include updated information on bike and pedestrian facilities.

RESPONSE L04-089

Non-motorized facilities located on local arterials will meet or exceed local jurisdiction's design standards.

RESPONSE L04-090

There will be direct impacts to public services and utilities as part of the proposed project, indirect (secondary) and cumulative impacts are not anticipated.

Local Government Services

1. **DEIS S-11** Mentions “principally low-intensity land uses would be converted to transportation uses”. While these may be “low-intensity uses”, they are mostly zoned industrial which is a large part of Fife’s growth, allure, and tax base. Further identify “low-intensity” and include the importance of land use to Fife.
2. **DEIS S-12** Loss of farmland is mentioned. Explain that this “farmland” is zoned as industrial in nature and loss of land for industrial use has a large impact on Fife.
3. **DEIS S- 13** Purchasing of produce elsewhere has an economic impact on Fife. Further detail the impact to the economy, farm workers, and residents, not only the impact of purchasing produce elsewhere. Further discuss the impact of wells in the area. The project will impact the active City wells located on 62nd.
4. **DEIS S-213** The City’s Comprehensive Sewer Plan identifies the entire south eastern portion of the City impacted by this project (especially that portion of the City east of SR 167) as utilizing a gravity fed sanitary sewer system, tying into portions already constructed, including pump stations. Public Water facilities are planned to serve the entire City as well. The DEIS does not address this planned service. Further discussion needs to be added.
5. **Table 3.01** All of the Water Resources impacts and the WSDOT mitigation requirements shall meet all the requirements of the City of Fife Storm Water Comprehensive Plan. All of the Transportation impacts and the WSDOT mitigation requirements shall meet all the requirements of the City of Fife Transportation Comprehensive Plan. All of the Pedestrian and Bike impacts and the WSDOT mitigation requirements shall meet all the requirements of the City of Fife Parks and Rec. and Transportation Comprehensive Plans. All of the water and sewer impacts and the WSDOT utility mitigation requirements shall meet all the requirements of the City of Fife Water and Sewer Comprehensive Plans. The impacts of road reconstruction shall be constructed to City of Fife standards, including the requirement of relocating overhead utilities underground.

DEIS Comments
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RESPONSE L04-091

The FEIS summary and section 3.11 of the FEIS have been revised to show that agricultural land is expected to convert to commercial and industrial uses in accordance with local zoning.

RESPONSE L04-092

Sections 3.11 and 3.12 have been updated to explain that existing farmland has been re-zoned to industrial, commercial, and residential uses.

RESPONSE L04-093

The project will mitigate for any wells directly impacted by the project.

RESPONSE L04-094

The project will mitigate for any impacts to public water and sewer facilities.

RESPONSE L04-095

We will continue to coordinate with the City regarding any impacts to City-owned facilities throughout final design and construction.

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6. **DEIS 3-60** Identify the City of Fife water supply wells on the map.
7. **DEIS 3-200** A local church runs a food bank that needs to be included in the Social Institutions section.
8. **DEIS 3-201** The utility section incorrectly identifies the supply areas of Tacoma Power and Puget Sound Energy.
9. **DEIS 3-202** The water section needs to add the City of Fife as a water provider as well as identifying the Fife water service area. The City of Fife Water Comprehensive Plan needs to be referenced and adhered to with any planning of the water system. The City of Fife provides sewer service to part of the SR 167 project area. The entire Fife City limits are identified as the Fife sewer service area per the Sewer Comprehensive Plan. This needs to be referenced and adhered to. The construction of SR 167 bisects this service area. Provisions must be made by the SR 167 project to ensure the entire City can be served by the Fife sewer system, per the sewer plan.
10. **DEIS 3-200** A local church runs a food bank that needs to be included in the Social Institutions section.
11. **DEIS 3-201** The utility section incorrectly identifies the supply areas of Tacoma Power and Puget Sound Energy.
12. **DEIS 3-202** The water section needs to add the City of Fife as a water provider as well as identifying the Fife water service area. The City of Fife Water Comprehensive Plan needs to be referenced and adhered to with any planning of the water system. The City of Fife provides sewer service to part of the SR 167 project area. The entire Fife City limits are identified as the Fife sewer service area per the Sewer Comprehensive Plan. This needs to be referenced and adhered to. The construction of SR 167 bisects this service area. Provisions must be made by the SR 167 project to ensure the entire City can be served by the Fife sewer system, per the sewer plan.
13. **DEIS 3-204** The utility impacts and mitigation shall adhere to the City of Fife codes, including the undergrounding of all relocated overhead utilities.
14. **DEIS 3-206** SR 167 mainline - The Fife water system needs to be identified. The Fife/Tacoma intertie is located in the vicinity of the 54th interchange area. Any impacts to the Fife water system shall adhere to Fife standards and the Fife water plan. Both the Tacoma intertie and the Fife supply wells are in or near the SR 167 project limits. They are the only water sources for the City system and shall be protected as such. Any impact to these supply sources shall be completely under the permission and direction of the City of Fife.

L04-096

RESPONSE L04-096

L04-097

Group A and B public water supply wells and wellhead protection zones are shown on figure 3.2-5 in the FEIS.

L04-098

RESPONSE L04-097

Section 3.10.2 of the FEIS is revised to include the food bank.

RESPONSE L04-098

Section 3.10.2 of the FEIS is revised to clarify this information.

L04-099

RESPONSE L04-099

Section 3.10.2 of the FEIS is revised to include information about the Fife water service area.

RESPONSE L04-100

WSDOT will coordinate with the City regarding utility relocations during design and construction of the project.

RESPONSE L04-101

Section 3.10.2 of the FEIS is revised to include information about the Fife water system. WSDOT will coordinate with the city on this issue during design and construction of the project.

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L04-101