

## Attachment E

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Comments and Responses to November 2007 Revised Environmental Assessment

# Attachment E: Comments and Responses to November 2007 Revised Environmental Assessment

The Revised Environmental Assessment was issued on November 8, 2007, for public review and comment, with written comments accepted between November 8, 2007 and January 11, 2008. Public comment was provided on the Revised EA during the November 14, 2007 public open house, during the November 27, 2007 public hearing, and as written comments received during the 64-day comment period.

Comment letters, comment forms, the public hearing transcript, and e-mails were compiled and organized using a indexing and organization protocol established by the U.S. Forest Service for environmental impact documents. The steps included:

- sort form letters, e-mails, other letters, and open house comment forms;
- create identifier number for letters, e-mails, public hearing transcript, and open house comment forms on PDF file;
- create mailing list/index to letters within Access database;
- create list of codes for comments ;
- print working copies of letters;
- identify and code comments in letters on working copies;
- mark PDF versions with comment codes and comment numbers;
- enter comment numbers and codes into an Access database; and
- prepare comment and response tables and respond to comments.

Table E-1 presents a list of the categories of comments (topics), the topic codes, and the number of comments received by category.

**Table E-1. Comment Topics and Codes and Number of Comments**

<b>Topic</b>	<b>Code(s)*</b>	<b>Number of Comments</b>
Purpose and Need, Range of Alternatives, Alternative Modifications, Funding	03.0, 04.0, 05.1, 05.2	24
Public Involvement	03.5	62
NEPA Process	05.5	36
General	05.0, 1.3	46
Geology and Soils, Erosion	15.0, 15.1	3
Groundwater Resources and Quality	20.0, 20.1	28
Floodplains	25.0	1

Topic	Code(s)*	Number of Comments
Wetlands	30.0	6
Streams	35.0	18
Vegetation and Wildlife, Fish and Wildlife Conservation Areas, White-tailed deer, other wildlife	40.0, 40.1, 40.2, 40.5	50
Land Use and Displacement, Schools, Rural Residential, Agriculture, Just Compensation, Right-of-Way Acquisition, Environmental Justice	45.0, 45.1, 45.2, 45.4, 45.6, 45.8, 45.9	52
Environmental Justice	50.0	1
Transportation, Traffic, Safety	55.0, 55.1, 55.2	157
Air Quality	60.0	10
Noise	65.0	31
Visual Resources	70.0	4
Section 4(f), Cultural, Historic	85.0, 90.0, 90.1	13
Hazardous Materials	80.0	1
Cumulative Impacts, Precedent Setting	05.3, 05.4	5
Construction Impacts, Vegetation Maintenance	55.3, 40.7	7
Other (Non-substantive)	01.0, 01.1	18
Total		573

\* Code(s) refer to the topic entry numbers designated during compilation of letters and comments in the Access database.

## Comment Letters and Responses

A total of 573 comments were received from 100 comment letters, open-house forms, e-mails and public testimony. The comments received were extracted from the comment letters, forms, e-mails, and public hearing transcript and presented as separate tables in Attachment E (Table E-2 written comments received) and Attachment F (Table F-1 comments from public hearing testimony).

Table E-2 presents the comments received from the comment letters, forms and e-mails. The table includes a code number by topic (see table E-1 above for list of topics and corresponding codes numbers), an assigned comment number, the comment extracted from the letter, followed by the response to the comment. Please note that, on occasion, bracketed words are presented in the comments (e.g., Letter 10, Comments 1 and 2). These bracketed words have been included to provide clarification of phrases or sentences. The comment letters have not been provided in the paper version of this FONSI because of the large number received. However, the letters are on the CD version and also available in PDF format on the Spokane County website at <http://www.spokanecounty.org/engineer/>

**Table E-2. Responses to Written Public Comments on the Bigelow Gulch Road/Forker Road Urban Connector Revised Environmental Assessment**

Topic Code	Letter Number	Comment Number	Comment	Response
03.5	1	1	The Channel 2 News this morning indicated that the County Engineers and Road Department would have a discussion of the proposed Bigelow Gulch modification. Is this an accurate description of this evening, and did this inaccurate information get to their news department via inaccurate communications with the County?	There was a communication problem with a news release the day before the public hearing that was corrected in a news release later the morning of the hearing. The information on the web site, 4' x 8' signs on the project and the newspaper advertisement were correct. The County Engineer and the Assistant County Engineer were available in a room separate from the public hearing to discuss any questions people may have had regarding the project.
01.0	1	2	I think some of my comments regarding the earlier Assessment may not have been addressed, but I will research this issue further to make certain.	Comment noted.
03.5	1	3	First let me mention that the time from initial availability of the revised Environmental Assessment document to the time for public testimony is extremely short. There was only 12 days from the open house until today's public testimony which allowed little time even to read the documents let alone review any referenced supporting data. Two of these days, offices were closed for the County because of Thanksgiving and four were Saturdays and Sundays, leaving only six days to ask for and receive information. The Project manager from Jones & Stokes and Associates informed me that the Department of Highways recommends that Environmental Assessments be a maximum of 15 to 50 pages. This document is probably nearer 800 to 1,000 pages with many documents and studies referenced but not included. This document is about twenty times larger than the maximum recommended size of an Environmental Assessment and still at least 10 times larger even if you do not include the Appendix. The Federal Department of Highways recommends a	The comment period was extended to January 11, 2008, a 64-day review period.  The size (number of pages) for Environmental Assessments is a guideline. EAs vary in size and complexity based on the level of environmental analysis necessary for each specific project.

Topic Code	Letter Number	Comment Number	Comment	Response
			minimum of 30 days of comment for their 15 to 50 page document. And extension of the comment period would be in the public interest and in the spirit of assuring informed public response and input to allow appropriate time for adequate and thorough review of these documents by all concerned. I would suggest at least an additional 75 days and another public testimony period near the end of such an extension.	
01.1	1	4	I want to go on record that I have requested information from the Assessment's author and from the County regarding information referenced in these documents but have not yet received it. I do not think at this time the delay is anything other than the logistics and time flow because of the holidays, but the time is getting short and in fairness for a thorough and reasoned response more time will be needed for review of this document and any supporting data that should be available for review regarding this Assessment.	Comment noted. Following several traded voice messages, a telephone conference call with Mr. Burnett was achieved on December 14, 2007 with the Jones & Stokes' project manager and noise specialist. Mr. Burnett has also met with Spokane County engineers.
65.0	1	5	A couple of other issues that I would like to mention briefly are first the Noise issue. From my reading of the documents, the baseline used for the noise modeling study does not include any existing trees, berms or other barriers which should be accounted for in evaluating any additional noise impact or mitigation requirements. There is almost absolutely no or perhaps only one instance of noise mitigation proposed. I have spoken with the Assessment's author who is in the process of getting me in contact with their Noise specialist to answer some of my questions, but he has been out of the office recently and we are trying to connect. The approach is the Assessment seems to be to put the Noise issues off until later, then trust us or sue us. Jake brakes or compression brakes were not addressed and should be prohibited. I note that the Airport has recommendations about noise above 65 db	Comments noted. The noise modeling results represent a "worst case" analysis and projection of future decibel levels. The "worst case" assumes a straight "line-of-sight" from the noise source (traffic) to the receptor (e.g., residence) with no obstructions such as terrain, trees, or other barriers that would otherwise reduce the decibel levels.  See response to comment 1-4 above.  The issue of Jake brakes was addressed in Appendix 3, Table 3-3, pages 163 and 164 of the Revised EA.  Mitigation for loss of roadside vegetation has been addressed in section 4.12.7 (page 4.12-23) of the Revised EA, and presented in Attachment D (Mitigation Commitments) of the FONSI.

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			<p>as reported in today's newspaper. Many instances above this level will occur along the new proposal.</p> <p>There seems to be no funding or an overall philosophy to address this issue or the issue of roadside vegetation that potentially will be removed and how the county will address and fund issues of mitigating visual degradation.</p>	
20.0	1	6	<p>[Another] issue is wells and water. This Assessment addresses some items ignored in the earlier version but the issue of water wells that may be damaged is not completely addressed. If public water is substituted for private wells, will the cost of the water from another provider be the same as that for operating one's own well?</p>	<p>The cost of public water as well as operation of wells are dependent on the amount of use and varies with each user. The quality of the public water is known to be better than the well waters in this area. Rate information can be derived by contacting Kathleen Small, General Manager of the Pasadena Park Irrigation District 17 at 509/926-5535.</p>
05.1	1	7	<p>[Another] issue I would like to address briefly is the design and safety issues. One design possibility that was not addressed was a two-lane configuration with center turn lane at a 35 mph speed limit. This might be a better fit long term when in fifteen to twenty years or more this area may be Urban. Building a road larger than the size of Trent Avenue across the Prairie seems excessive. It is argued that safety is a justification for these changes. I would suggest that a 35 mph limit would increase safety immensely. This consideration should be evaluated now again for safety issues. I also request any documentation that the County or Roads Department have where they have requested greater traffic speed enforcement along Bigelow Gulch. I note that multiple times per month that traffic emphasis is set up at the 35 mph zone at the bottom of Argonne hill.</p>	<p>A three-lane roadway would not solve the Level of Service problem and is intended for Urban type roadways. Please see section 3.2 of the Revised EA for the engineering analysis of the number of lanes. A 35 mph speed limit (rural areas) would be unrealistically slow to the majority of drivers, would be unenforceable and not proven to be safer. To our knowledge documentation does not exist on requests for enforcement. Increased enforcement presence in the Bigelow Gulch and Argonne corridors is present due to both areas being identified as high enforcement areas by the Spokane County Sheriff's Office. There has been no request for greater traffic or speed enforcement made by the Spokane County Engineer's Office.</p>
55.1	1	8	<p>I note that the additional traffic this project probably will generate has not been addressed as it is sure to affect the town of Millwood and Spokane Valley at Sullivan Road, both of which are seemingly at maximum</p>	<p>Sullivan Road is addressed in the Revised EA, see page 4.9-23. As shown Figures 4.9-2 and 4.9-3 of the Revised EA, the traffic volumes on Argonne south of Bigelow Gulch would be lower with the proposed</p>

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			capacity.	Connector than under No-action.
01.3	2	1	Your design of the Bigelow-Forker intersection looks good. It appears the needs of people from the north have been considered.	Thank you for your comment.
01.3	3	1	Looks like most of previous concerns have been examined and accounted for in this plan.	Thank you for your comment.
65.0	4	1	Noise Level increase = Adverse Health Problems.	Thank you for your comment. Please see section 4.11 of the Revised EA regarding the noise analysis.
04.0	4	2	Has an overpass in front of the middle school been considered?	We assume that when you mention the "front of the middle school" you are referring to the East Valley Middle School which fronts on Progress Road. If the proposed project is to be constructed, there would not be a need for a (pedestrian?) overpass over Progress Road since Progress Road in that location would be a dead end street. If you are referring to a pedestrian overpass on Sullivan Road (which is on the back side of the middle school), mitigation now includes an option of a pedestrian tunnel or a pedestrian bridge (see page 5-20 item 3).
55.2	4	3	As it looks now: Is it unreal to think that maybe a rape and or murder may occur if a tunnel allowed [?]	Thank you for your comment. The project now includes an option for either a pedestrian tunnel or a pedestrian bridge.
55.2	4	4	East of Francis that connects to Bigelow Gulch Road will still not improve the drivers' safety.	Comment noted. Francis Avenue is within the City of Spokane and not part of this project. Please see response to comment 27- 23 and 27-24 in Table F-1 regarding improvements within the City of Spokane.
55.2	4	5	Will the Sullivan bridge that crosses the [railroad tracks] and Trent able to withstand the added stress and traffic?	Please refer to page 4.9-23 of the revised EA for this analysis.

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55.0	5	1	Where the existing South Bend Forker intersects with the 5-lane the west turning we need an accelerating lane. Slow down lane off of the north bound 5-lane to access north Forker so as to not slow the right lane of the 5-lane. I hope we can fund the South Forker underpass.	Thank you for your comment. Design of the intersection is not complete. Deceleration and acceleration lanes will be evaluated during design.
02.0	5	2	A completely different matter: The Farwell road west of Forker what is the process to establish a seasonal road? The hill is steep. There is a spring that floods and then freezes on the roadway (nearly 16 inches of built up ice in 2006-2007 winter. The hill is in the shade all day.  People that live above (Everetts) travel west and avoid the hill (Dexters) live below the hill and travel east in slippery season.  What about an unmaintained road? Primitive road? Private road?	This comment is not related to this project and it has been forwarded to the Spokane County Road Department for a response to the sender.
70.0	5	3	Maintain rural aesthetics we like the narrow road and the trees.	Thank you for your comment.
01.3	6	1	This is needed so much. In the winter I hate going down Forker: too narrow. Need 4 lanes on Forker and Bigelow. Good plan. Hope all goes through soon.	Thank you for your comment.
01.1	7	1	Please include in the mail packages any future meetings or mailer.	Thank you for your comment. Your name has been added to the distribution list.
55.0	8	1	It would be nice to have "slip lanes" where Bigelow meets Forker so cars going northwest Bigelow and turning north Forker could pull off just before the intersection. Cars coming South Forker and turning right (to go west northwest Bigelow) could have a lane to accelerate before merging with Bigelow traffic.	See response to comment 5-1 above

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01.3	9	1	Your entire proposal is great; a lot of care has been taken to satisfy the above. I'm very impressed! Let's build this highway. Great job you guys!	Thank you for your comment.
45.0	10	1	[The Urban Connector Alignment]: [Destruction] of rural landscapes, in opposition to state's (2000-2001) prevention of urban sprawl.	Thank you for your comment. Land use is discussed in section 4.7 and in Cumulative Impacts (section 4.17) of the Revised EA. Zoning of lands that the Bigelow Gulch Road/Forker Road Urban Connector passes through are outside of urbanized areas and remain rural in nature (See Figure 4.7-1.) Land use and zoning may change in the future, however such changes will be driven by the Spokane County and city comprehensive planning processes following State-mandated planning processes, which have a public involvement requirement.
40.5	10	2	[The Urban Connector Alignment is a] danger to wildlife (a natural preserve – Palmer Rd).	Thank you for your comment. Vegetation and Wildlife are discussed in section 4.6 of the Revised EA.
01.3	10	3	[The Urban Connector Alignment increases] traffic, noise, safety issues.	Thank you for your comment. Traffic and safety are discussed in section 4.9 of the Revised EA. Noise is discussed in section 4.11.
05.3	10	4	[The Urban Connector Alignment is a] precursor to land development.	Thank you for your comment. See response to comment 10-1 above.
40.5	11	1	If [the] 208 swale actually holds water it may really be a wildlife draw requiring a passage under [the] highway. There are lots of deer. Many moose [and] an elk herd.	208 swales will be designed to infiltrate into soil to minimize standing water. Surface water (streams, wetlands) currently exists at several locations near the proposed swales and detention ponds. As mentioned on page 4.6-13, Spokane County will evaluate the feasibility and benefits of installing a wildlife undercrossing.

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55.0	11	2	Also please consider a merge on and off at Forker.	We assume that you are referring to a Bigelow Gulch Rd. and Forker Rd. merger. The merge addressed as the "Forker Road Interchange" on page 2-15.
40.0	12	1	The retention pond at the Forker/Bigelow intersection will be a wildlife magnet as the only surface water -- elk, moose and deer will be crossing Forker and/or Bigelow to get to it.	See response to comment 11-1 above.
55.2	12	2	Move it [retention pond at the Forker and Bigelow intersection] or give them [wildlife] a passage or [the] hazard to drivers will increase.	See previous response to similar comment 11-1.
55.0	12	3	Forker needs deceleration to turn north. Look at Highway 2 and Brooks Road as good examples. Also, need [the] chance to merge turning west from Forker. Consider ski traffic.	See response to comment 5-1 above
55.0	13	1	Concern about Forker and Bigelow intersection. Needs a better merge for southbound (from Forker), not a yield sign. What about using a roundabout solution?	See response to 5-1 above. A roundabout is not recommended at locations with more than a 4% grade. Forker is 6% so therefore a roundabout is not conducive to this application.
55.2	13	2	Short merge in winter is dangerous in slick conditions. Speed limit 45 is too high.	See response to 5-1 above. The speed limit is taken into consideration when designing acceleration and deceleration lanes.
04.0	14	1	I recommend the road go east on Stoneman Rd then drop down Harvard Rd to freeway I-90. To connect onto Sullivan is causing a transportation bottleneck with traffic to and from East Valley High School and the industrial park.	Section 2.2 Purpose and Need, of the EA, outlines the project purpose. Regional transportation linkage is one stated purpose, linkage to I-90 is provided by the North Spokane Corridor. Sullivan Road impacts are discussed on page 4.9-23 of the Revised EA.

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65.0	14	2	Noise will increase in the residential areas around the schools, and a federal study has shown increased noise from airports causes severe health effects of people leaving near them.	Comments noted. Noise modeling was conducted at the schools as part of the Revised EA. The results of the analysis are presented in Appendix 6 Revised Noise Discipline Report.
05.0	14	3	The same [severe health effects] would occur from increased traffic, plus air pollution in our area.	Comments noted. Air quality is addressed in Section 4.10 of the Revised EA.
55.2	15	1	I was commissioned a State Trooper in 1967 and retired in 1993. From May of 1968 until June of 1973 my assignment included patrolling state highways in Spokane County and county roads as well. In particular I was assigned the Valley Detachment as a trooper which included Forker and Bigelow Gulch. From 1983 until 1985 I was the WSP Valley Detachment Sergeant. During these years I investigated far too many traffic collisions on Forker and Bigelow Gulch. From 1985 until 1991 I was a detective sergeant responsible for the investigation of felony accidents for a seven county area including Spokane County. Again, I investigated or directed the investigation of collisions in the area in question. On one occasion I responded to a head-on injury accident just south of Bigelow on Forker. When I parked my patrol on the ice the super of the road caused the car to slide to the ditch. I had to crawl on hands and knees to treat the injured who were unconscious, one of whom was a close friend. These roads are such that my wife and I have lived in fear that one of our four children would be injured on these roads because of the 1) traffic violations occurring everyday 2) because of road design and condition.	Thank you for your comments.  Right-of-way acquisition and completion of design will occur upon completion of the EA process followed by construction. Construction is anticipated to commence in 2008.
			Although I retired from the WSP [Washington State Patrol] in 1993 I still drive this road everyday to work and observe the following violations all too frequently; failure to stop at stop signs, failure to yield the right of way (especially at Forker and Bigelow), following too	

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			close, speeding, driving over the centerline, speed too fast for conditions, DUI, reckless driving, negligent driving, driving while under the influence of drugs, etc. It's not that the violations I see or have taken action about in the past are uncommon. Indeed, it's that they are so common on these particular roads. Your report speaks to the higher rate of collisions and fatalities per million miles which is no surprise to me. What is a surprise, however, is that it's taken so long for the county to find the support, will, or where-with-all, to reach this stage. My question is when will we see construction begin?	
03.0	15	2	The road: Anyone who has studied the proposed connector recognizes the problems which, occupied with poor driving, exacerbate the problems drivers face – gradient, poor sight distances, sharp curves, narrow lanes, almost or in some places no shoulders. Add all this to increased volume; drivers pressed for time, commercial traffic, and law enforcement responsibilities that take them away from effective patrols since there are other priorities that take precedence. This is a combination for disaster for too many, many of whom are innocent. We need this project to begin now.	Thank you for your comments.
55.3	16	1	Proper erosion and sediment control practices must be used on the construction site and adjacent areas to prevent upland sediments from entering surface water. Local stormwater ordinances will provide specific requirements. Also refer to the Stormwater Management Manual for Eastern Washington ( <a href="http://www.ecy.wa.gov/programs/wq/stormwater/eastern_manual/manual.html">http://www.ecy.wa.gov/programs/wq/stormwater/eastern_manual/manual.html</a> ). All ground disturbed by construction activities must be stabilized. When appropriate, use native vegetation typical of the site.	Comment noted. Please see sections 4.1 and 4.5 of this Revised EA regarding stormwater pollution prevention.

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20.1	16	2	Any operation which would generate a waste discharge or have the potential to impact the quality of state waters, must receive specific prior authorization from the Department of Ecology as provided under Chapter 90.48 RCW, Chapter 173-216 WAC, Chapter 173-220 WAC, Chapter 173-200 WAC and Chapter 173-201A WAC.	Comment noted. The County will submit permit applications (including a request for a short-term water quality modification) during the design phase.
15.1	16	3	A Stormwater Pollution Prevention Plan for the project site may be required and should be developed by a qualified person(s). Erosion and sediment control measures in the plan must be implemented prior to any clearing, grading, or construction. These control measures must be effective to prevent soil from being carried into surface water by stormwater runoff. Sand, silt, and soil can damage aquatic habitat and are considered pollutants. The plan must be upgraded as necessary during the construction period.	Comment noted. A Stormwater Pollution Prevention Plan will be prepared during the design phase of the project and prior to construction.
80.0	16	4	Proper disposal of construction debris must be in such a manner that debris cannot enter the natural stormwater drainage system or cause water quality degradation of surface waters. Dumpsters and refuse collection containers shall be durable, corrosion resistant, nonabsorbent, non-leaking, and have close-fitting covers. If spillage or leakage does occur, the waste shall be picked up immediately and returned to the container and the area properly cleaned.	Comment noted. These requirements will be set forth in the project specifications to be fulfilled by the construction contractor.
55.3	16	5	The operator of a construction site that disturbs one acre or more of total and area, and which has or will have the discharge of stormwater to a surface water or to a storm sewer, must apply for coverage under Department of Ecology's Baseline General Permit for Stormwater Discharges Associated with Construction Activities.	Comments noted. A construction NPDES permit application will be submitted during the design phase of the project

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			<p>Owners of site where less than one acre of total land area will be disturbed must also apply if the construction activity is part of a larger plan of development or sale in which more than one acre will eventually be disturbed. Discharge of stormwater from such sites without a permit is illegal and subject to enforcement action by the Department of Ecology.</p> <p>Application should be made at least 60 days prior to commencement of construction activities. A permit application and related documents are available online at:  <a href="http://www.ecy.wa.gov/programs/wq/stormwater/construction">http://www.ecy.wa.gov/programs/wq/stormwater/construction</a>; or by contacting the Water Quality program, Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600; (360) 407-6401.</p>	
05.0	16	6	State Environmental Policy Act (SEPA) Ecology's comments are based upon the information provided with the SEPA checklist. As such, they do not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.	Thank you for your comments.
04.0	17	1	In the short time available to read and understand the EA we [The Prairie Protection Association] see it ensures the North-South freeway [North Spokane Corridor] will never be completed along the planned route.	The two projects are independent. This project does not replace the North Spokane Corridor (NSC). Please see response to comments 96-2 and 96-3.
45.2	17	2	In the short time available to read and understand the EA we [The Prairie Protection Association] see it destroys the Orchard Prairie Community.	Thank you for your comments. The impacts to the Orchard Prairie Community were identified in section 4.16 of the Revised EA.

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45.2	17	3	In the short time available to read and understand the EA we [The Prairie Protection Association] see it dismisses the concerns of local property owners.	Thank you for your comments. The concerns expressed by the public regarding the January 2006 EA, were addressed in the response to written comments and to the public hearing comments. The responses to the comments are presented in Appendix 3 the November 2008 Revised EA. Additionally, Spokane County will be negotiating with property owners during the design phase.
40.5	17	4	In the short time available to read and understand the EA we [The Prairie Protection Association] see it kills off the elk herd and other wildlife.	Thank you for your comment. Impacts to Vegetation and Wildlife are discussed in section 4.6 of the Revised EA.
45.0	17	5	In the short time available to read and understand the EA we [The Prairie Protection Association] see it delivers urban sprawl.	Thank you for your comment. Land use is discussed in section 4.7 and in Cumulative Impacts (section 4.17) of the Revised EA. See response to comment 10-1 above.
04.0	17	6	In the short time available to read and understand the EA we [The Prairie Protection Association] see it thwarts the urban connector plan and defies the WSDOT plan.	Thank you for your comments. See responses to letter 96.
45.1	17	7	In the short time available to read and understand the EA we [The Prairie Protection Association] see it endangers the children of Orchard Prairie School.	Thank you for your comment. Please see sections 4.7 and 4.16 of the Revised EA. The connector is being relocated away from the Orchard Prairie School when compared to the existing alignment of Bigelow Gulch Road. The connector provides improved shoulders and improved visibility. Buses will pick students up on both sides of the corridor, removing the need for them to cross the busy travel lanes of the facility. These and other factors should improve safety for school children.
01.3	17	8	In the short time available to read and understand the EA we [The Prairie Protection Association] see it wastes federal, state and county money.	Thank you for your comments.

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03.5	17	9	In the short time available to read and understand the EA we [The Prairie Protection Association] see it uses outdated and inaccurate traffic studies.	Thank you for your comments. See responses to comments in Letter 88, comments 11 through 19 regarding the traffic analysis.
01.3	17	10	In the short time available to read and understand the EA we [The Prairie Protection Association] see it turns a long-needed safety improvement into a massive highway project.	Thank you for your comments. Chapters 2 and 3 of the Revised EA explain the need for the project as proposed.
03.5	17	11	In the short time available to read and understand the EA we [The Prairie Protection Association] see it continues disingenuous public input process.	Comment noted.
90.0	18	1	My primary concerns are with the Addendum Cultural Resources Survey Report, meant to be an addendum to our 2001 report (Axton et al. 2001). The J&S report does not include a map showing where pedestrian visual survey took place, so the area surveyed remains unclear. Upon reading the narrative, it becomes apparent that pedestrian visual survey took place at only three locations along the project corridor. Our 2001 report recommended that such survey be conducted along the entire route. This has apparently not been done, leaving significant areas un-surveyed, including a large gap near the center of the project where roadway will be constructed cross-country. In the gully of Forker Road, it appears that cut and fill lines extend beyond a number of irrigation and water impoundment features that were not surveyed or recorded. Also, an abandoned poured concrete building on present Progress Road appears to be partially within the project APE, but was not recorded as well. The same thing applies to the stone pillars at E. 12426 Bigelow Guich Road. DAHP survey guidelines require that 100 percent of the project APE be surveyed. Also, no shovel testing was conducted, as recommended in the 2001 AHS report. Ground surface visibility within the APE was reported to	<p>Thank you for your comments. We apologize for not making clearer in the Revised EA that Appendix 5 was an addendum to the 2004-2005 study completed by Jones &amp; Stokes and previously presented as Appendix E in the January 2006 Environmental Assessment. We did not reprint that report in the Revised EA since it had previously been included in the EA process and instead was noted by reference. We have sent you a copy of the 2004-2005 study.</p> <p>Appendix 5 of the Revised EA, that you reviewed and commented on in your November 15, 2007 letter, was prepared to address changes in the proposed project that occurred since publication of the 2004-2005 report. These changes included the addition of a new interchange at Bigelow Road and Forker Road and modification to a portion of the near Palmer Road and along Forker Road.</p> <p>Regarding the misspelling of the AHS author Susan Axton in the addendum, we do apologize for that error. The error was an unfortunate carryover from the misspelling that originally occurred in our 2004-2005 report. This error will be addressed in the</p>

Topic Code	Letter Number	Comment Number	Response
		<p>be “excellent” throughout. A recent drive-through of the project area indicates that this could not have been the case at any time of the year. Survey reports need to fully justify when shovel testing is not called for, or when portions of the APE are not surveyed at all. The 2001 AHS report was only a preliminary review and background document. Our recommendations for cultural resources survey, reflecting guidelines and expectations of project review authorities, including WSDOT and DAHP, were not followed. The resulting survey methodology employed may not be favorably reviewed.</p>	<p>Errata/Additional Information section of the FONSI to the Revised Environmental Assessment.</p> <p>As mentioned above, the Appendix 5 cultural resources addendum was an addendum to 2004-2005 cultural resources assessment. A description of the survey methods is presented in that report. The entire proposed project was surveyed either in 2004 or 2007. Pedestrian surveys were conducted in 2004 by professional archaeologists along the entire proposed alignment. In the spring of 2007, archaeologists also conducted pedestrian surveys at the new interchange at Bigelow Road and Forker Road, near Palmer Road and along Forker Road previously mentioned.</p> <p>Irrigation and water impoundment features located on Forker Road were surveyed and photographed as part of the 2004-2005 cultural resources study. Two other in-channel features along Forker Road were also identified and were associated with Wetlands 5 and 12. None of these features appeared to be greater than 50 years in age. The concrete foundation near Progress Road was surveyed and photographed and is located outside of the proposed road right-of-way.</p> <p>The stone pillars are associated with the George H. Collin House (see enclosed Cultural Resource Assessment) which was included as part of the 2004 survey and inventory. The house is eligible for listing in the National Register. In earlier discussions, the homeowners of 12426 E. Bigelow Road requested of Spokane County that the pillars be moved back from the roadway right-of-way as part of mitigation.</p> <p>As previously mentioned, the survey was a pedestrian reconnaissance survey and not an intensive subsurface survey. Even though it was a reconnaissance level survey, a limited number of shovel probes were</p>

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				<p>excavated in areas where there was a perceived higher probability for unknown buried archaeological resources in realignment of the roadway in areas north of Progress Road and east of Forker Road and near the Bigelow/Forker Road intersection. These probes failed to identify any archaeological material.</p> <p>Based on conditions during the 2004 and 2007 surveys, the ground visibility was categorized as excellent. Surveys were conducted during late fall/early spring when vegetation was minimal.</p> <p>Both the 20004-2005 and 2007 survey reports have been approved by WSDOT and DAHP.</p>
03.5	19	1	<p>Thank you for the opportunity to testify. While I applaud the department's efforts to make this a more open process that has been the case in the past, I must respectfully point out, as I did in a letter to the County Commissioners, that 30 days simply isn't enough time to make a meaningful response to the document that was presented to the public.</p> <p>It is the job of the County Engineering Department to absorb and understand this document. Citizens play catch up.</p> <p>It is written in engineering-eze and other specialized languages that I don't speak. And for these and other obvious reasons, like normal daily life's pushes and pulls and career pressures that interfere with my ability to decipher this document, I ask that we be given much more time to study, reflect, and react to the Environmental Assessment.</p>	<p>Thank you for your comments. Please see response to comment 1-3 regarding the extension of the comment period.</p>
04.4	19	2	<p>This highway directs traffic to two critical bottlenecks.</p> <p>There has been no attempt to discuss the ramifications</p>	<p>As shown in the traffic analysis portion of the EA, traffic is projected to be reduced on Argonne south of Bigelow Gulch due to the improved service the urban connector</p>

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			the highway will have on the Millwood Township. This tiny cottage-style town hasn't any room for expansion. And no one has even talked to them about how this super highway might affect them. Clearly more cars using this road will be backed up from the 6-10 trains per day that stop traffic at Argonne and Euclid. The Millwood spokesman I visited said Argonne is at capacity now.	will provide. Traffic is projected to reduce through the community of Millwood.
05.2	19	3	There is an assumption that there will be funding for a bridge expansion at Trent and Sullivan in the city of Spokane Valley. Their engineer is not convinced that the widening will happen, as no funding is on the horizon. And it drops critical mass of cars to a very inadequate merger.	See responses to comments 10-1 and 17-7 above.
45.1	19	4	I have concerns of the more parochial and individual nature. I am concerned for the life of our tiny Orchard Prairie School, for which I have just been elected a board member. This corridor would be the death-knell. Highways draw development. I fear both urban sprawl and commercial development, neither of which the school can withstand.	Thank you for your comments. See response to comment 10-1 above.
65.0	19	5	Your project will render my childhood home uninhabitable. It is already unpleasant to be outside because of the noise. The expansion will bring the noise level to a dangerous range.	Comments noted. The noise level at the identified house is projected to increase by 1 dBA. As stated in the noise analysis, this level of increase is normally not discernible to the human ear. It is highly unlikely that an increase in noise will be detected at the subject residence. In addition, the county will work with impacted home owners on noise issues during the design phase of the project.

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45.2	19	6	Even though your Jones and Stokes didn't find it [childhood home] of historical significance, it is the oldest home on the prairie, and has historical and monetary significance to my family and me.	Comments noted. Please see Appendix E Cultural Resource Assessment (January 2006 EA) regarding the historic properties evaluation.
03.5	19	7	This [letter] is just a cursory response to the EA. I request more time for a more formal answer to the County's insistence on the inappropriate scale of the necessary improvement of Bigelow Gulch Road.	Comment noted. Please see response to comment 1-3 regarding the extension of the comment period.
20.0	20	1	The piece of property that my family is concerned about is just west of the "historical" Paulson property and on the south side of Bigelow gulch road. The address is 7810 E. Bigelow Gulch Road. Our mother Mrs. Ruth Montanye is currently residing at that property. She is 86 years old. Our parents made their initial purchase of property at that site in 1963. My late father built all of the buildings on the property. The house my mom lives in sits on one acre and her water for household use and irrigation comes from a well.  Groundwater:  I have looked at all the material that came with the packet our mother was sent in order to try to determine exactly how far south the road will come in to what is currently our mom's property. I really can't figure out exactly how wide the road will be at our mom's property. Instead of me trying to figure it out, I will simply tell you what exists now so you can understand our concern. The approximate distance from the current road's centerline to the only water on the property is 68 feet. My parents have established water rights on that well and have had since the 1980's.	Comments noted. Spokane County will determine the exact location of the right-of-way during the project design phase. Groundwater impacts are presented in section 4.2 of the Revised EA. The exact location of your well will also be determined during design. Please see Attachment D (Mitigation Commitments) for the measures to be taken regarding groundwater and wells.
45.0	20	2	The one acre piece that the house [located at 7810 E. Bigelow Gulch Road] sits on is one that falls off sharply	Comment noted.

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45.8	20	3	<p>to the south right behind the house. The house sets on really the only reasonable spot on the acre. The house has an open face basement on the south end. It can't be moved back. It's as far back as it can go unless one were to add a lot of earth behind it.</p> <p>Air Quality, Noise, Visual Quality:</p> <p>The house [located at 7810 E. Bigelow Gulch Road] sits back of the current road center line about 116 feet. Depending on how much wider the road is made at that location, it could have [a] large impact on air quality 4 lanes versus 2 and noise from the anticipated increase in traffic flow and of course visual quality of the property. Depending on the proposed increase in road width, the value of the home could be destroyed.</p>	<p>Comment noted. The impacts of air quality and noise are presented in sections 4.10 and 4.11 of the Revised EA. An additional analysis of fine particulates is presented in a technical memorandum in Attachment A of this FONSI. Spokane County will be negotiating with property owners during the design phase.</p>
80.0	20	4	<p>As we all know, more and more hazardous material is being hauled on our roads. With the anticipated increase in traffic flows, it is only logical that there will be an increase in hazardous material going ever closer to our mom's house. Then there is the runoff from the road into the groundwater and probably the well.</p>	<p>Improved safety via adding lanes, improving sight lines, separating directional traffic, and adding shoulders will reduce the potential for and severity of accidents along this facility. The projected reduction in number and severity of accidents in turn will reduce the likelihood that any hauling vehicle will be involved in an accident, and will reduce the potential for an accident involving a hazardous material hauler and a subsequent spill of that material.</p>
55.0	20	5	<p>We have concerns about getting on and off the new road from our property, particularly turning in while going west or turning out to go west.</p>	<p>Comment noted. During the design phase, Spokane County will work with you regarding specific access and egress considerations to and from your property.</p>
45.2	20	6	<p>We are fully aware that we are not going to stop this ball from rolling. We just don't want it to roll over us. Like many people, this place was and is my parents' biggest, most precious material investment. Depending on what your plan is when you get to 7810 E. Bigelow Gulch Road, this home or really my parents' dream can either</p>	<p>Thank you for your comments.</p>

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01.3	21	1	<p>The James W. Weston and Helen M. Weston Living Trust, through its attorneys, Elizabeth A. Mosey of Winston &amp; Cashatt, submits this memorandum in opposition to the Proposed Action set forth in the Revised Environmental Assessment issued November 8, 2007.</p> <p>The Trust [Weston Living Trust] objects to the shifting of the right-of-way to avoid the Paulson Farmstead.</p> <p>Spokane County's Bigelow Gulch Road/Forker Road Urban Connector Project (Project) will impact the Trust [Weston Living Trust] Property by taking frontage for right-of-way (ROW) use. The Project Description set forth in the Revised Environmental Assessment (Revised EA) provides that:</p> <p>A 0.14-mile section of the right-of-way from west of Jensen Road to just east of Argonne Road would be reduced in width from 120 to 80 feet and shifted slightly south to avoid the historic Karl Paulson Farmstead on Bigelow Gulch Road...</p> <p>This proposal causes the Trust to bear an inequitable burden as all of the additional ROW will be taken from it and the centerline moved closer to the Trust Property.</p>	<p>Comments noted.</p>
45.9	21	2	<p>The Karl Paulson Farmstead (Farmstead) is not listed on the National Register of Historic Properties, and no application for listing it has been made. The Farmstead is merely eligible for listing. The Cultural Resource Assessment done in conjunction with the January 2006 Environmental Assessment (original EA) contemplated using .48 acres of Farmstead for Project ROW. It was</p>	<p>Thank you for your comments. As was mentioned in Chapter 5 of the Revised EA (Section 4(f) Evaluation), the decision made to first avoid, where possible, any "use" of historic properties deemed eligible as a historic property based on the cultural survey conducted for the project. The selection of the proposed alignment provides that avoidance while</p>

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			<p>determined by the Officer of Archaeology and Historic Preservation (now Department of Archaeology and Historic Preservation-DAHP) that this use would have "no adverse effect" on the Farmstead. Nevertheless, the County proposed to avoid the [Karl Paulson] Farmstead by narrowing the ROW and shifting the centerline to the south. The County maintains this proposal in the Revised EA.</p> <p>The avoidance of the Farmstead is neither required nor necessary to preserve the historic nature of the property. However, shifting the ROW will directly and negatively impact the Trust's [the Weston Living Trust] property, and require the Trust to bear and unequal portion of the ROW burden.</p>	<p>achieving the purpose and need of the project, and fulfilling the requirements of Section 4(f). See response to comment 21-11.</p>
45.9	21	5	<p>Section 4(f) of the Department of Transportation Act of 1966 (4(f)) does not require the County to avoid using the [Karl Paulson] Farmstead property for the ROW. 49 U.S.C. 303 (2007). Since the original EA was completed, Section 4(f), 49 U.S.C. [section] 303, has been amended to include an exception to the avoidance requirement where there is only a de minimis impact to a historic property. 49 U.S.C. [section] 303(d). Therefore, the 0.14-mile section of the right-of-way from west of Jensen Road to just east of Argonne Road should be split equally between the Farmstead and the properties located to the south of it.</p>	<p>See response to comment 21-4 above. A de minimus finding provides an opportunity for the DOT to justify minor impacts to a 4(f) eligible site in order to allow construction of a transportation facility. Such a finding is discretionary and the agency retains the option of completely avoiding the 4(f) eligible property. There is no requirement that a de minimus finding be made to balance impacts between a 4(f) eligible site and any other non-eligible site. In this case, balancing the right of way need would serve only to harm the 4(f) - eligible property while providing no significant benefit to the non-eligible property. If the decision had been to impact the 4(f) eligible property by balancing the right of way takes, then both properties would have been expected to provide a 40' width. In that case, the corridor width would have remained at 120' through the immediate area of the two properties rather than being reduced to 80' with an alignment correction and accompanying speed reduction.</p>

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85.0	21	6	<p>Amendment to Section 4(f) allows use of Farmstead property for the Project ROW.</p> <p>In August 2005, 4(f) was substantively amended to allow use of historic properties for transportation purposes where there will only be a de minimis impact. 49 U.S.C. [section] 303(d). This amendment created an exception to the requirement that historic sites not be used unless there is no prudent and feasible alternative. 49 U.S.C. [section] 303(c). The statute provides</p> <p>(d) De minimis impacts</p> <p>(1) Requirements -</p> <p>(A) Requirements for historic sites. The requirements of this section shall be considered to be satisfied with respect to an area described in paragraph (2) if the Secretary determines, in accordance with this subsection, that a transportation program or project will have a de minimis impact on the area.</p> <p>(2) Historic site. With respect to historic sites, the Secretary may make a finding of de minimis impact only if -</p> <p>(A) the Secretary has determined, in accordance with the consultation process required under section 106 of the National Historic Preservation Act (16 U.S.C. 407f) that -</p> <p>(i) the transportation program or project will have no adverse effect on the historic site; or</p> <p>(ii) there will be no historic properties affected by the transportation program or project;</p> <p>(B) the finding of the Secretary has received written concurrence from the applicable State historic</p>	See response to comment 21-4 above.

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			preservation officer...; and	
			(C) the finding of the Secretary has been developed in consultation with parties consulting as part of the process referred to in subparagraph (A).	
			49 U.S.C. [section] 303 (d).	
			This amendment was necessary to address situations where "minor [section] 4(f) properties are protected at great expense, with little lasting benefit to the community or environment." David E. Kunz, Section 4(f): Analyzing Differing Interpretations and Examining Proposals for Reform, 31 J Legis.275, 308 (2005) (herein "Kunz"). For instance, in Kentucky, the old 4(f) required the state to avoid a historic farm house that was eligible but not listed on the historic register. The owner of the historic farm house also owned a house on the other side of the roadway that was not historic. In order to avoid the historic farm house, the state chose an alignment that resulted in a taking of the other house. With money paid for the taking, the owner demolished the historic farm house and moved the other house onto the historic property. Kunz, pgs. 308-309, citing Hearing on EXPDITE Act, H.R. 5455, stmt. Of John Horsley, Exec. Dir. Am. Assoc. of State Highway and Transp. Officials (October, 2007).	
45.9	21	7	Despite the fact that the [Karl Paulson] Farmstead meets the criteria for historical property status, the owners of the property have not sought to have the property formally listed. Furthermore, there is no requirement that the owners ever seek to have the property listed, or maintain its historic characteristics. Rather, the owners of the Farmstead and the other property owners located to the north of the 80 foot ROW will be given the substantial benefit of not having any additional property taken for ROW and the roadway will	As required by 4(f) requirements, avoidance of the property was based on the eligibility for listing not on a formal listing. All properties required for the project will be acquired by Spokane County based on the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended. The Act establishes a uniform policy for the fair and equitable treatment of individuals and businesses displaced as a direct result of programs or projects under taken by a federal agency or

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			be shifted away from their properties. Meanwhile, the Trust Property [the Weston Living Trust] and other properties located to the south of the 80 foot ROW will be forced to bear the entire burden of the additional ROW and will have the roadway closer to their properties. This result is inequitable and unnecessary.	with federal financial assistance.
45.1	21	8	The purpose of the Project [the Urban Connector Alignment] is to "improve safety, accommodate more traffic, and allow freight to move through the area more easily," presumably well into the future. Revised EA, p 1-1. Accordingly, the Project will also impact the future development of the area. It is also foreseeable that the property located along the Project route will become more valuable for development, both residential and commercial. This increase in value is likely to cause owners, including the owners of the [Karl Paulson] Farmstead, to divide and sell their property.	Comment noted. As mentioned in the Revised EA, the proposed project would not include any changes to the comprehensive plan land use designations and zoning. Changes to the underlying comprehensive plan land use designation and zoning would require amendments to the Comprehensive Plan and the County Zoning Code, which is not part of this proposal. Any future amendments to the Comprehensive Plan must be consistent with County or city policies and the requirements of RCW 36.70 and RCW 36.70A.
90.1	21	9	Any sale of [Karl Paulson] Farmstead Property would diminish if not completely eliminate the historic value of the Farmstead.	Comment noted.
45.9	21	10	The [Karl Paulson] Farmstead would retain the benefit of the shifted ROW while the public benefit is eliminated and the Trust [the Weston Living Trust] Property remains inequitably burdened by the ROW. Consequently, the County should not avoid the Farmstead since doing so is inequitable and not required, and does not achieve any significant or permanent public benefit.	Comment noted.
85.0	21	11	The County should request that the DOT make a finding of de minimis impacts with regard to the [Karl Paulson] Farmstead. The DAHP [Department of Archaeology and Historic Preservation] has already concluded that the [Urban Connector Alignment] Project will have "no	See response to comment 21-5 above.

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			<p>adverse effect" on the Farmstead as required by 4(f). 49 U.S.C. [section] 303(d)(2)(B). Further, this finding was relied up by Jones &amp; Stokes in its Cultural Resource Assessment, and by the County in the original EA satisfying subsection 49 U.S.C. [section] 303(d)(2)(C). Additionally, the County stated, in regard to "Alternative 1" set forth in the original EA, that "Even though the use of historic property would occur, the [[DAHPP]] has determined that there would be no adverse effect on the eligible historic properties." Environmental Assessment, [section] 5.3.3 (January 2006).</p> <p>The record so far supports a finding of de minimis impacts, all that is missing is DOT approval. Once a de minimis finding has been made, the County is free to split the ROW equally between all effected properties relieving the [Weston Living Trust] Trust of the inequitable burden. This would also allow the County to maintain the location of the centerline of the roadway, avoiding the cost associated with shifting the Project alignment.</p>	
45.9	21	12	<p>The FHWA [Federal Highway Administration] encourages project sponsors "to examine projects currently in the environmental process to see if any would benefit from application of the de minimis impact criteria". Diane Mobley, FHWA Materials-Section 4(f) Statute, ALI-ABA Course of Study, 159, 174 (April, 2007). Examination of the [Urban Connector Alignment] Project as it related to the [Karl Paulson] Farmstead would reveal that using a portion of the property for ROW will not have a negative impact on its historical value. Moreover, using the Farmstead for ROW will ensure that similarly situation properties are equally burdened by the Project.</p>	Commented noted.

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45.9	21	13	The circumstances here are precisely those that the de minimis exception was aimed to address. Therefore, the Trust [Weston Living Trust] requests that the County obtain a finding of de minimis impact so that the Trust Property is not unnecessarily forced to bear a disproportional burden of the addition of ROW for the project.	Thank you for your comments.
20.0	23	1	Within three days of the trench being dug across Bigelow Gulch Rd near Old Argonne Rd., my well went dry. I contacted the county about the problem and dealt with Mr. Chad Coles. At first they sent out an inspector and he talked with me and agreed to have the contractor Westway Construction bring me water. Then a few days later the county told Westway to stop the water delivery. When I asked Mr. Coles what was going on, he informed me that the county did not believe they caused my water problems. He said the county would have a geologist look at my situation and decide if they were at fault. When this man came to my house he wouldn't even touch the sample jars of dirty water that had come out of my faucets. He only looked inside my pump house, from a distance. He never even went down into my front yard to look into my shallow well. He just stood in the driveway and looked around. Approximately one month later I was told that "the construction didn't cause my problems and that the construction wouldn't have affected any of the wells in my direction because the water naturally flowed in the other direction down Bigelow Gulch." We were also informed that the position of our well wasn't low enough to have been affected. I believe that logic to be incorrect anyways as water flows uphill, around, and through obstacles all the time. He must have been measuring from my storage tank in my pump house, which is up on a hill, not my well down in my front yard, which would be	Spokane County has responded to this complaint that is related to the construction of the Argonne Road/Bigelow Gulch intersection project that was completed in 2005. A geotechnical consultant was hired to investigate the complaint. There was no evidence that the problem with the well was related to this construction project. A conversation with the water purveyor in this area revealed that they too had the same complain lodged against them and that their investigation revealed that the past owners of that property related that they had problems with that well many years ago prior to any construction by either the water district or Spokane County.

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			inaccurate information anyway.	
			<p>This house has had the same water source for over 80 years and it just happened to dry up within three days of this project starting. I have lived here since 1991 and I have never experienced anything like this before. I was also told that we should wait until the winter and see if the water came back. Of course since it is a shallow well, when it rains more and there is snow on the ground the amount of water increases. It has now been over 2 years and it has never returned to the way it was. My family and I have had to deal with hauling water for 10 months out of each year since the construction began, and have had to ration and be very conservative on showers, dish and laundry washing and have not even been able to water our lawn!</p>	
			<p>I have been away for most of the last two years working on the Hurricane Katrina Project, and have not had time to pursue this further until now. I have done a little investigating on my own and have found out that my neighbor's well that it about two hundred and fifty yards further south of mine was also affected. While they did not lose all of their water they did experience dirty water to the point of having to change filters much more frequently and they even had to replace an almost new pressure tank.</p>	
			<p>I talked to another neighbor and he knew the name of the project manager for Westway. I contacted Mr. Giddings and asked him if he would explain to me what he had encountered during the project. He had some very interesting information. He said that when they were digging through the middle of the road they hit a still functioning cistern full of water that had several pipes coming out of it, going in several directions, on north and a couple south. He said that there was so much water coming out that he had to stop work on the</p>	

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			<p>project and called over a county inspector to see what had happened. He said they stopped work and had to issue a "change order" for the project and use clay instead of sand to surround the culvert. He said that if they didn't do that, there was so much water it would wash away the sand around the culvert and the road would sink down. Keep in mind that I was told that my well probably just ran dry, yet at this very same time the county has to stop and change the project because of all the water coming through there!</p>	
			<p>A couple days later the neighbor on the north side of the road, Mr. Russ Aley, came down and was complaining about the dirty water and that he didn't have much water coming through. I have since contacted Mr. Aley who has confirmed the story and also shared with me the problems he went through to get his water source replaced.</p>	
			<p>When I explained to Mr. Giddings what I was told about the water flowing naturally down Bigelow Gulch, not across and down Old Argonne Rd., he disagreed and said that the water did not indeed flow south down through the little valley there. He also told me about one day when there was a little rain, that he had to fill the water truck five times, sucking up the water there just to be able to continue working. He said very clearly that the construction there did disrupt a functioning water system that fed multiple sources and that the construction did disrupt and alter the natural flow of the surface water.</p>	
			<p>I know without a doubt that this construction affected my water source and that the Spokane County Inspectors knew much more than they told me.</p>	
			<p>The November 2007- Revised Environmental Assessment w/Appendices under section 4.2-</p>	

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			<p>Groundwater makes my case pretty clear. According to your own experts "GeoEngineers", the cut area that poses the greatest risk of affecting ground water supply is area 7; the part that I say affected my water. Table 4.2-1 only shows a proposed cut depth of fourteen feet. According to Mr. Giddings, the depth was more like twenty-five feet deep.</p>	
			<p>On page thirteen of this document under the heading "Water Wells" it states – As previously mentioned, construction (cuts and blasting) of the proposed action could potentially affect water quality and quantity in private water wells adjacent to the roadway. To address and mitigate for this potential impact, Spokane County will:</p>	
			<ul style="list-style-type: none"> <li>- identify and locate in the field, any well and/or spring located within 1,000 feet of the roadway alignment;</li> </ul>	
			<ul style="list-style-type: none"> <li>- evaluate the water supply source hydrogeology to estimate source vulnerability where recommended by the geotechnical engineer for the project or as requested by applicable property owners;</li> </ul>	
			<ul style="list-style-type: none"> <li>- establish pre-construction baseline groundwater quality and quantity at the subject water wells, including capacity testing and flow measurements of spring sources provided that owner consent can be obtained;</li> </ul>	
			<ul style="list-style-type: none"> <li>- conduct post-construction, groundwater quality and quantity measurements of the wells and springs and compare with baseline testing results; and</li> </ul>	
			<ul style="list-style-type: none"> <li>- provide an alternate source of water (e.g., new well or extension of water supply from nearest irrigation district) for wells impacted by the project.</li> </ul>	
			<p>If Spokane Count had followed their own protocol before starting the project my family would not have had to</p>	

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45.8	23	2	<p>endure over 2 years of unnecessary hardship.</p> <p>I am determined to get what I had before, "water", nothing more and nothing less. I am going to do whatever it takes to be heard on this issue [dry well] and to get it resolved. I trust you will do what is right for an honest, tax paying, Spokane County property owner. I have contacted my state representative Lynn Schindler to show her this information and to get her advice on how to proceed in resolving this issue, such as contacting county commissioners, media, etc. I can be reached at 928-7209 or cell number 999-0080 and would appreciate a prompt response.</p>	<p>Comment noted. Please see response to 23-1 above.</p>
20.0	24	1	<p>This letter is to voice my concerns about the effects on my well from the construction that was done on Bigelow near Old Argonne Rd. Typically I would replace one or two filters in my system for a while summer, and during the construction period on Bigelow Gulch near Old Argonne Rd, I replaced at least one filter every week. I also had to replace a pressure tank that was only 3 years old. The reason I was given that the tank failed was the abrasion of the sand had wore a hole in the bladder.</p> <p>These problems were not typical before the construction began. I have lived at this location and been servicing this week for 11 years. At the time this was occurring, I did speak to a couple of workers in regard to the water issue and I was assured it could not possibly be linked to the work being done at that time. Due to some recent new information, I now question that assurance.</p>	<p>Comment noted. Please see response to 23-1 above.</p>
20.0	25	1	<p>I was the person responsible for installing the pipe on the Argonne/Bigelow intersection project, approximately three years ago. During that project, there was an excavation, just west of the intersection of Old Argonne and Bigelow, for a 42" culvert. As the crew dig across</p>	<p>Comment noted. Please see response to 23-1 above.</p>

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			<p>Bigelow they discovered an old structure. It was a foundation wall 8'-10' long, and they also found another structure-it was a cistern, or a well. I discussed these structures with the county inspectors, and came to the conclusion, most likely, and old wind mill and well. These structures really had no impact on the culvert we were trying to install, but water started coming out of the well, and was running through the completed section of culvert. County inspectors instructed me to build a dirt plug (a mound of clay-like materials to prevent water from washing out the bedding sand) and proceed.</p> <p>Days later, after backfill I heard complaints from the house on top of the hill to the north. The land owner told me his water had gone muddy and was undrinkable. He also asked when he would be hooked-up to the new Pasadena water line. I was also aware that it had damaged water quality and quantity, to another house on Old Argonne. The county had Westway bring several loads of water to this residence to try to fix the problem. By now I realized that the well under the street had supplied water to both houses. Later, when the water line was completed, the household to the north was hooked-up to public water and the pump house to the north of the intersection was abandoned. The household to the south was never hooked-up, or even investigated further. It would be my suggestion that before any more roadway be build, that the existing water line, to this house, if any be found and hooked to the main line. These issues need to be resolved quickly, as the Knight household has been packing water for around three years now, and Bigelow Gulch project continues. The two can be resolved more effectively now; if the confusion continues it may cost much more to fix.</p>	
45.0	26	1	I would like to make sure that the construction of this horrendous highway does not change the land usage of the existing lands around it. My fear is that like when	Thank you for your comments. Please refer to sections 4.7 and 4.17 of the Revised EA regarding impacts to land use, and specifically changes in land use and

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			Argonne Pines, Evergreen and Sullivan roads were "improved", the areas became business and industrial.	zoning. See response to comment 10-1 above.
45.2	26	2	If the county of Spokane keeps allowing construction projects, building developments and the like in the name of "progress", we will not have the beauty and natural appeal of our area. If I wanted to live in a "concrete jungle", I would move to Seattle! A good example of how we are ruining the integrity of our area is demonstrated by looking north on Argonne Road from [the] Mullen and Montgomery intersection. One side of Argonne is housing development on the left and to the right is a beautiful wooded forest. Please think about this project before you allow more rich developers to ruin our beautiful area. Our community is rural! Our school district is rural! The loss of this feeling would be an abomination.	Comments noted. See response to comment 10-1 above.
03.0	26	3	I think that having a four-lane highway coming right through the school property is terrible and that this project is unnecessary and a waste of our tax dollars to appease a few people who want to get home faster! Once this [Urban Connector Alignment] is built there is no turning back, nor can the land be turned back.	Comments noted.
55.0	26	4	The changes in the noise of trucks and increased traffic in the area is also a factor. Why not decrease the speed on Bigelow Gulch so that safety wouldn't be such a factor. A traffic light near the middle school would also be a safety factor.	Comments noted. See response to comment 1-7 regarding speed limit. As mentioned in the Revised EA, the proposed alignment would reduce the current traffic volume in front of the middle school on Progress Road.
45.2	26	5	We don't want to be "citized" here!	Thank you for your comment.
55.1	28	1	The EA relies on the Trent/Sullivan Bridging the Valley project to address queuing problems at the ramp intersections. As there is currently no funding for this project, the City is concerned this interchange will	The impacts of the proposed project to Sullivan and Trent are addressed in the revised EA on page 4.9-23. The intersection would remain at an acceptable LOS with both the No Action and proposed action. The

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			become a bottleneck.	queuing concern is improved with the Bridging the Valley project which is a Regional (two state) stand alone project that has FHWA approval of a documented categorical exclusion and is currently pursuing the remainder of project funding from Washington and Idaho States and the Federal Railroad Administration.
55.1	28	2	The November 2007 MTP version of the Regional Travel Demand Model shows a large volume of eastbound Bigelow traffic heading east on Wellesley, south on Flora, then turning east again on Trent. The EA should include an analysis of the impacts to the intersection of Trent/Flora. Signalization or other improvements may be warranted.	The EA correctly utilized the SRTC Interim Regional Travel Model. The interim model was developed to provide a 20-year analysis period, thus a 10-year forecast was not possible. The recently available 2007 MTP version of the regional model was still being refined when the EA was published and was not available as an analysis tool. The intersection of Trent/Flora did not show any adverse impacts from the traffic volumes when evaluating the results of the interim model.
55.1	28	3	The 2015 MTP model includes the Bigelow Gulch project, and the 2030 model includes both Bigelow Gulch and the full NSC. In the 2015 model the NSC is only completed to Francis, and as a result the volumes on Bigelow and Forker are higher in 2015 than in 2030. The forecast model used by Spokane County for the EA assumed completion of the full NSC. Since Bigelow Gulch would likely be completed before the NSC, we request an analysis of impacts to Spokane Valley's Sullivan Road intersections with the NSC completed to Francis only.	Use of the interim model was the correct choice given that the SRTC was developing a model for use into the future and that model did not become available until after the publication of the subject EA. The interim model did not allow for the development of the mid time period analysis requested. To reopen the traffic analysis using the newly adopted MTP model, which includes significant changes in land use in the east county area to produce a 2015 analysis would be an unrealistic burden to this complete evaluation.
55.1	28	4	The analysis of the I-90/Sullivan interchange needs to be updated. The Spokane county Traffic Engineer's most recent analysis was not incorporated into the November 2007 document. The Sullivan Road river bridge widening is programmed to start in 2010, not 2007 as stated in the EA.	The I-90/Sullivan interchange is addressed in the Revised EA, using the interim model. The results of that model show that the planned City improvement will result in an acceptable level of service per adopted City standards, see page 4.9-23. The Sullivan Road River bridge widening has been reprogrammed by the City of Spokane Valley to start in 2010 (See 2008-2013 TIP, City of Spokane Valley). The construction schedule of

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				<p>this bridge corresponds well with the revised construction schedule of the Bigelow Gulch/Forker Road Urban Connector Project due to the delays which occurred in the EA analysis. The revised project construction schedule is addressed in the Revised EA, see page ES-3.</p>
55.1	28	5	<p>The increased traffic on Sullivan Road as a result of the Bigelow Gulch project creates an unfair burden on Spokane Valley and future developers to mitigate existing failing intersections. Not only do the existing traffic volumes have to be accommodated in any mitigation effort but the increased volume from the Bigelow Gulch Project must also be accommodated. Spokane County needs to mitigate traffic impacts due to the Bigelow Gulch Project, specifically at the intersections of Trent/Sullivan and Indiana/Sullivan.</p>	<p>There are no vehicle trip generators along the urban connector route. The current and future growth of vehicle trips is predominantly generated within the City of Spokane Valley. This is reflected by the 2030 projected commercial and industrial density along Sullivan Road in the Spokane County Metropolitan Transportation Plan (MTP).</p>
01.3	29	1	<p>I am submitting my opposition to the revised Bigelow Gulch Road Forker Road Urban Connector. My opposition is for reasons of safety and environmental concerns.</p>	<p>Comment noted.</p>
55.2	29	2	<p>I am a resident of Orchard Prairie and travel Bigelow Gulch every day and am very aware of the safety issues it poses now. I am not opposed to making this roadway safe for auto travel but am very much against the urban connector concept making this into a four lane high speed highway to cater to heavy freight transportation. I have been a proponent of doing what it takes to make the Gulch into a safe two-lane road with turning lanes and "official" bicycle pedestrian lanes. Similar roads have been made in this county and city. Some examples would be Mirabeau Park, McDonald Rd as it exits and heads south off of I-90 and the recently completed South East Blvd in the city of Spokane.</p>	<p>The Speed limit will remain the same as it is today, 45 mph. Freight mobility is discussed in EA section 2.2 "Purpose and Need". In the Urban sections of the connector, sidewalks and bike lanes will be provided, the rural sections will have 8 foot paved shoulders to accommodate bicycles. The similar roads you mentioned (Mirabeau Park, McDonald Road, and South East Blvd) are Urban roadways with different functionality and characteristics than the proposed Connector.</p>

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05.0	29	3	I feel this revision only serves to waste federal, state and county money to lay more asphalt for a mode of transportation that may not be supported in the very near future. Is anyone in the engineering office aware of the shortage of fossil fuels?	Comments noted. The proposed project would shorten the driving time and distance for travelers between the eastern side of the City of Spokane and the City of Spokane Valley. Please note the shorter travel distances referred to Table 2-1 (page 2-6) of the Revised EA.
55.2	29	4	How is a four-lane highway safer than what we have now? This new revision will only serve to encourage increased speeds making it that more dangerous for drivers and pedestrians.	Traffic Safety is discussed in Sections 2.2 and 4.9 of the EA. Regarding pedestrians, the existing roadway have little or no shoulders, the connector has 8' shoulders in the rural sections and bike lanes and sidewalks in the urban sections.
45.0	29	5	Not only does this destroy a rural community and dismiss the concerns of long term land owners in its path, it will also be a contributor to urban sprawl.	Comments noted. Please see response to comment 10-1.
03.5	29	6	I am asking the county for an extension on the revised E.A. to give more time to review the document.	Comment noted. Please see response to comment 1-3.
01.3	30	1	I believe this is necessary for logistical purposes. I believe that although it may cause people to be inconvenienced temporarily, it will be a benefit in the end.	Thank you for your comments.
55.2	31	1	Hewes Marine Company in Colville, WA has been making boats for 60 years. We use the Bigelow Gulch corridor on a frequent basis to move freight to and from our planet. The construction project will increase the safety of those using this route.	Thank you for your comments.
05.0	31	2	It will also enhance our competitiveness so we can continue to provide over 100 manufacturing jobs to our economically stressed region.	Thank you for your comments.
55.2	32	1	This needs to happen for the safety of human lives, too many accidents occur to too dangerous road conditions.	Thank you for your comments.

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55.2	33	1	Bigelow Gulch is an important corridor for our community. To not take steps to make this a safer route would be irresponsible. Please act on this development ASAP.	Thank you for your comments.
01.3	34	1	Please continue to push this project through to completion. I am certain there is resistance with improvement, as there always is to any public and/or private improvement. The impacts are minimal compared to the improvements proposed.	Thank you for your comments.
55.2	34	2	Remember the needs of the many outweigh the needs of the few. Safety of the motoring public would certainly be a number one priority, as this development would greatly reduce the risk of accidents.	Thank you for your comments.
55.2	35	1	This road is a driving hazard year round. Accidents abound each year in Bigelow Gulch. It needs to be redone.	Thank you for your comments.
01.3	36	1	The Bigelow Gulch project has my full support. We cannot allow the project to be delayed any further.	Thank you for your comments.
01.3	37	1	We need this project to continue as soon as possible. I understand the people who live in the area want to preserve what they have, but unfortunately an ever-increasing population requires this.	Thank you for your comments.
05.0	37	2	Congestion and safety make this project a must.	Thank you for your comments.
55.2	38	1	To improve our ability to move safely about and through Spokane with less constraint on the public.	Thank you for your comments.
55.2	39	1	I am just voicing concern about the Bigelow Gulch road in N Spokane, the need to straighten it. I used to work	Thank you for your comments.

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05.2	39	2	on one of the corners for Living Water, that was a very dangerous place to try to get in and out of, I have seen a lot of accidents on this stretch of road.	
			I want my tax dollars going for some good, this is a project I support, I am willing to vote for higher taxes to pay for it.	Thank you for your comments.
55.2	40	1	This project (Bigelow Gulch) needs to proceed post haste. Public safety continues to be in jeopardy as this road is heavily used, under patrolled, with too many dangerous curves.	Thank you for your comments.
55.1	40	2	Traffic efficiency is being impeded, as well as there is no easy way from the Northside of Spokane to the Valley.	Thank you for your comments.
55.2	41	1	This project is a serious need for the community. Environmentalist concerns, although they should be considered as to minimize the impact in a responsible fashion, should not be used as the sacred alter for which to inhibit the natural growth of our community and the safety of those living there. Proceed already with the project!	Thank you for your comments.
55.0	42	1	Here at URM stores we have hundreds of inbound and outbound tractor trailer rigs that travel numerous additional miles into town to catch I-90 east bound rather than to use the gulch road. Not only do we then create more congestion in town but we add significant tire while burning additional diesel on each and every route.	Thank you for your comments.
55.2	42	2	We also have many employees who travel that route and we are constantly concerned for their safety. From a conservation standpoint, no different than the north south corridor, this stretch needs to be fixed.	Thank you for your comments.

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55.2	43	1	We need the Bigelow Gulch project started for safety issues. I have traveled that road for 23 years for work and have seen a number of fatal accidents. The traffic has just continued to grow over the years. The slope on the road on icy days is dangerous because you just slide off the road or into oncoming traffic. Please do what needs to be done, this project is long overdue! Thanks.	Thank you for your comments.
05.0	44	1	Please follow through on the improvements to the Bigelow Gulch road to protect our safety and to improve traffic flow from N Spokane to the Valley.	Thank you for your comments.
01.0	45	1	Thank you for giving me the opportunity to express my concerns on Bigelow Gulch Road. I would also like to take the opportunity to tell you and your staff what a great job you did on the engineering and construction of the corner of Argonne and Bigelow and the Argonne corridor. This area is so much safer for the general public since your construction that I just can't tell you how much a positive change this has been. I am the owner of the southwest corner and I had to give up property to the county to complete their design. Something I was happy to do to improve the corner and make it safer for the general public.	Thank you for your comments.
55.2	45	2	Bigelow Gulch Road is a road with serious issues. It is very high volume traffic and it seems like every day the emergency crew respond to some issue created by the road. This road was never designed to carry this horrendous load with the great numbers of semi trucks and larger vehicles. It is windy, it has poor shoulders for problem traffic and emergence crews, it has poor visibility, and because some of it is up and in the sun and other parts are deep in a dark canyon, it is more susceptible to temperature changes in a short distance. I believe the poor design and placement of the road are responsible in at least part for the seven deaths that	Thank you for your comments.

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			<p>have occurred in the last twelve years, at least one of which I witnessed. I called the county engineers and asked for the number of accidents in the last twelve years and they gave me a figure of 546. This is a terrible number and one that should get everyone's attention. About a year ago I decided to go to the Prairie Protection Association and sat in the back of the room to hear their thoughts on Bigelow Gulch road improvement. I couldn't believe my ears when I heard one man bring up the ideas of planting endangered fish in the creek, trying to find an endanger plant to challenge the process and even talking about planting Indian remains. He may have thought he was clever or funny but I take the deaths of people very seriously. I have found these same opponents at every meeting that I have had to develop my nursery and in my opinion they are not above doing or saying anything that will serve their purpose to stop any project regardless of its merits. With the average death rate of a state highway at 0.59 million miles traveled to Bigelow Gulch's rate of 2.16, this is over three times the normal death rate. It would in my opinion be very difficult for an intelligent person to make an argument in defense of leaving this death trap the way it is.</p>	
55.0	46	1	<p>I am in support of the revision of the Bigelow Gulch road. I travel this road several times a day during the week. It is one of the most treacherous roads I travel in Spokane. Blind corners, no shoulders or turn lanes, overgrown trees hanging over the road. I have broken down this stretch of road and had no place to get off the road. Bigelow Gulch needs to be revised.</p>	<p>Thank you for your comments.</p>
55.0	47	1	<p>Bigelow Gulch is way overdue for upgrades and improvements. For years many of us have reluctantly traveled to the Northside using this passage due to the narrow roads, too many vehicles and numerous blind spots.</p>	<p>Thank you for your comments.</p>

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55.1	47	2	My son in law travels to work at URM using this passage and says it is only getting worse as more and more homes are built in the area which is increasing traffic. Homeowners on the passage need to understand that there is more at stake than just widening the road – our lives (and theirs) should take precedence over one’s desires to stop progress.	Thank you for your comments.
55.2	47	3	Over the last few years, building has boomed in the area and the probability of accidents and deaths due to the increased volume of traffic has increased drastically. If homeowners in the area want to try and control anything, they should stop selling off their land a few acres at a time to developers to build hundreds of homes on. This will never happen, but by widening and improving visibility in the passage, hopefully there will be fewer traffic mishaps, less congestion, injuries and deaths. Just because a few of the “concerned” residents have not been hurt or a loved one seriously injured or worse, doesn’t even mean that it won’t eventually happen.	Thank you for your comments.
05.0	48	1	They need to look past their own selfish reasons for stopping the improvements. We all live in Spokane County by choice and most of us want to see safety improvements for all of our roads and highways and we should not be allowed to pick and choose which areas will be improved based on resident preferences – safety comes first in all areas.	Thank you for your comments.
05.0	48	1	We commend FHWA, WSDOT, and Spokane County for preparing and issuing this revised EA. There are several changes/improvements documented since the January 2006 EA, which include, but are not limited to, design changes that in some cases decrease the levels of environmental impact, such as to aquatic habitats, and measures to partially mitigate for impacts to wildlife	Thank you for your comments.

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03.0	48	2	<p>habitats. We appreciate the augmented environmental analysis and the additional efforts to mitigate impacts. However, EPA believes that potentially substantial impacts from the construction and operation of the proposed project could be addressed through additional analysis and mitigation commitments. We offer the following comments in that light.</p> <p>Purpose and Need. As discussed on page ES-3, the purpose is "to increase capacity, improve the transportation system linkage, improve roadway safety, and to accommodate existing and future freight linkages." We recommend that the EA also provide a Need statement and background information that describes the safety issues, freight needs and projections, linkage and capacity deficiencies. While this information is provided in the Transportation Chapter, it should also be summarized at the beginning of the EA and in the Executive Summary.</p>	<p>The Purpose and Need statement is presented in section 2.2 of the Revised EA. Each element of the purpose and need is described in subsections to section 2.2.</p>
35.0	48	3	<p>Streams. The EA discloses that 1,123 linear feet of Bigelow Gulch Creek, 2,699 linear feet of Forker Creek, and two tributaries would need to be realigned. The EA does not provide an explanation as to why these realignments are necessary. We recommend that the EA include the analysis and justification for realigning the streams, and that the options for avoiding and minimizing these impacts be disclosed.</p>	<p>The existing Bigelow Gulch Road and Forker Road parallel existing streams at the east and west ends of the proposed alignment. One of the goals of the roadway improvement project is to utilize as much of the existing roadway as possible, thereby limiting, to the extent possible, impacts to undeveloped lands. The impact to streams would occur where the stream channels occur parallel to the existing roadway and/or areas confined by steep terrain. As mentioned in section 2.3.3 of the 2007 Revised EA, the proposed action was modified to reduce impacts to stream channels and wetlands. The lower Forker Road portion of the proposed roadway alignment was realigned to avoid 1,877 linear feet of streams and 0.37-acre of wetland impact (see page 2-17) by shifting the alignment east. In addition to reducing the length of channels to be realigned, impacts to stream channel-associated wetlands were minimized through use of retaining walls in the vicinity of East Weile Avenue at old</p>

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60.0	48	4	<p>Mobile Source Air Toxics (MSATs). We appreciate the general discussion of MSATs in the EA. However, because this route would be serving nearby freight traffic, as well as higher volumes of non-freight vehicles, it is important to provide thorough analysis to characterize potential human health risks from the proposed project.</p> <p>On page 4.10-9 of the EA, it is stated that "Some recent studies have reported that proximity to roadways is related to adverse health outcomes, particularly respiratory problems." Yet, these studies are then dismissed, and no effort is made to identify sensitive receptors in the project area and the potential for elevated health risks to these receptors. Consequently, we recommend:</p>	<p>Bigelow Gulch Road. The footprint of the proposed roadway was reduced through the use of retaining walls and by realigning the proposed intersection at old Bigelow Gulch Road. Given the proximity of the stream channels to the proposed roadway, it was not possible to avoid impacts and realignments.</p> <p>First, it is important to note that FHWA does not expect emissions to increase over present levels at any location, and in fact MSAT emissions are expected to steadily decline in the future. The average daily traffic volumes will increase in the future under both the No Action and Proposed Action, but the expected reduction in per-vehicle MSAT emissions is expected to outweigh the increase in traffic volume. Figure 4.10-1 of the EA illustrates the nationwide forecasts of expected traffic volume increases vs. the expected future decline in nationwide MSAT emissions. We expect the nationwide trends shown in Figure 4.10-1 to represent the general trend in Spokane County. Figure 4.10-1 predicts a future increase of 64% in nationwide vehicle traffic, but per-vehicle MSAT improvements will result in major reductions in nationwide MSAT emissions (for example, nationwide emissions of carcinogenic diesel particulate matter are expected to decrease by 87% , after national average VMT growth rates are taken into account. As listed in Table 4.9-7 of the EA, future traffic along Bigelow Gulch Road is forecast to increase by 131% to 231% compared to existing volumes. Even with those forecast future traffic volume increases, EPA's per-vehicle MSAT improvements are certain to provide an overall decrease in MSAT emissions at all locations along Bigelow Gulch Road.</p> <p>Second, it must be noted that future traffic volumes along Bigelow Gulch Road will not be especially high, and the forecast percentage of trucks using the road will be only slightly higher than average. Future traffic</p>

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				<p>volumes associated with this project (up to 19,000 vehicles per day on some segments) are well below the levels of concern identified in EPA's particulate matter hotspot guidance (125,000 vehicles per day) or FHWA's MSAT guidance (140,000 vehicles per day). The truck percentage of 9-10% in the project corridor. (page 4.9-2) is only slightly higher than the national default of 8.3% assumed in the EPA and FHWA guidance. For the EA analyses, the percentage of trucks using Bigelow Gulch Road is not expected to change in the future. The number of daily truck trips will increase due to the future increase in overall traffic volume, but the future truck volume is very unlikely to exceed the 10,000 truck per day threshold provided as an example in the EPA guidance for new highway projects of concern for particulate matter.</p> <p>Based on these findings, it is likely that MSAT emissions along Bigelow Gulch Road will decrease steadily in the future, in which case human health risks will also steadily decrease.</p>
60.0	48	5	<p>Identification of sensitive receptors. Based on discussion elsewhere in the EA, it appears that at least the East Valley Middle School and East Valley High School and associated recreation fields would be sensitive receptor locations. Any others, such as senior centers, day care facilities, hospitals, etc., should be identified.</p>	<p>Section 4.11 gives a detailed description of all sensitive receptors within 500 feet of the proposed future roadway alignment. The sensitive receptors are as follows:</p> <ul style="list-style-type: none"> <li>• 82 single-family dwellings within 500 feet, of which only 10 dwellings would be within 100 feet of the revised alignment.</li> <li>• 2 churches, neither within 200 feet.</li> <li>• One fire station.</li> <li>• East Valley Middle School. The classrooms would be 1,000 feet from the road. Some of the baseball diamonds could be within 300 feet of the new alignment.</li> <li>• East Valley High School. Most of the classrooms are</li> </ul>

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60.0	48	6	-Disclosure of all locations at which emissions would increase near sensitive receptors because of project construction, intersections, increased traffic, including increased diesel traffic, increased loads on engines (higher speeds, climbs, etc.).	<p>more than 500 feet from the road, but one portable classroom is within 150 feet. One of the baseball diamonds could be within 300 feet of the new alignment, and the football stadium would be 500 feet away.</p> <p>Emissions would increase near all sensitive receptors temporarily during the construction period. However, the air quality impacts during construction would be temporary and localized. Because the project is expected to be constructed in six separate phases, the duration of construction at any given location is expected to be limited. The highest emissions would likely occur during site excavation and grading, when the largest pieces of diesel-powered equipment would be used. It is unlikely that this construction activity would be done for more than a few days near any given location. Other construction activities (e.g. underground utility installation) might take place for longer durations at some locations, but they would use smaller equipment with less intensive earthwork and correspondingly lower emissions.</p> <p>During operation, the highest concentrations of emissions would be expected at intersections (because of the combination of travelling and idling vehicles) and grades (because of the increased engine load required to negotiate the grade). Conditions under the proposed project would be improved relative to No Action at both types of locations. Tables 4.9-8 and 4.9-9 of the Revised EA document the improvement in intersection level of service; vehicle delay declines at all locations under the proposed action, with one exception (the intersection of East Bigelow Gulch Road and North Argonne Road, where average vehicle delay increases by one second). Outside of the project corridor, the Sullivan Road analysis notes that intersection level of service would improve, decline, or remain the same, depending on location (see pages 4.9-21 through -23 for</p>

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60.0	48	7	-An assessment or accounting of all the factors that could influence the degree of adverse impact on the population because of the activities listed above (e.g., distances to human activity centers and sensitive receptor locations, particularly parks, schools, hospitals, etc; amount, duration, and location of emissions from construction, diesel, and other vehicles).	<p>specific details). The project is expected to reduce the frequency and severity of traffic accidents, which besides providing a direct public health benefit (reductions in injuries and fatalities) will also reduce vehicle delay and idling associated with accident response. With respect to grade, vertical grades of up to 10% are present on East Bigelow Gulch Road between Havana Street and North Argonne Road, and on North Forker Road between Progress Road and East Bigelow Gulch Road. The design grade under the proposed action is no more than 6%, which would tend to reduce emissions at these locations relative to No Action.</p> <p>As noted above, the trend for MSAT emissions is downward, and the project is expected to be generally beneficial in reducing delay and roadway grade compared to No Action. Because of widening and realignment of the roadway, in some locations traffic will be moved somewhat closer to a few dwellings. In most cases, the change in the setback distance involved is less than 5 meters (due to the additional travel lane and median). The vast majority of homes are at least 100 feet from the existing road, so reducing the setback by 5 meters would not result in a meaningful increase in ambient pollutant concentrations. The increases in air pollutant concentrations caused by such a minor roadway widening were not evaluated in the EA, but it is reasonable to assume that ambient concentrations will be lower than state and federal ambient standards.</p> <p>There are a limited number of locations where a new section of alignment would shift the entire roadway closer to existing homes. These cases were illustrated in the Revised EA in the Noise section (see Houses 8 through 18 in Figure 4.11-1, Sheet 1 of 5). The closest dwelling in that group would be more than 130 feet from the new roadway, so it is unlikely any of those homes</p>

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60.0	48	8	<p>-Inclusion of construction mitigation measures.</p> <p>We appreciate the inclusion of construction mitigation measures to reduce engine idling and fugitive dust. We recommend reviewing the two enclosed lists of construction mitigation measures and adding several more measures to lessen toxic air emissions, which would improve conditions for construction workers as well as for the public at large. For more information about air toxics, please contact Wayne Elson of our Air Program at 206/553-1463.</p>	<p>would be substantially impacted by emissions from the shifted roadway.</p> <p>The recommended construction mitigation measures appear to be for southern California projects, in a part of the country that is grasping for emission reductions in densely populated areas to address severe air quality problems. While the County acknowledges the value of pollution prevention projects in all parts of the United States, we believe the benefits obtained from enacting some of the suggested construction mitigation measures would provide little benefit for the widely-dispersed rural residences near Bigelow Gulch Road, and the restrictions imposed by the suggested mitigation measures could substantially increase the cost to construct the project.</p> <p>The County acknowledges that windblown fugitive dust is a valid concern with any major construction project in an arid region, especially in those segments of the project within 100 feet of dwellings. Therefore, the County will enhance the fugitive dust-related mitigation measure that was originally included in the EA, by adding the following mitigation measure: Fugitive Dust Control</p> <ul style="list-style-type: none"> <li>Spokane County will require the construction contractor to prepare a Fugitive Dust Control Plan, including appropriate Best Management Practice measures described in the document "Guide to Handling Fugitive Dust from Construction Projects" prepared by the Associated General Contractors of Washington. The Dust Control Plan will be submitted to the County for review and approval before construction begins.</li> <li>The County will conduct appropriate inspections to confirm the measures specified by the Dust Control Plan are being implemented.</li> </ul> <p>The County believes the use of after-market emission</p>

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40.0	48	9	<p>Wildlife. The EA states (p. 4.6-10) that wildlife roadkill (including white-tailed deer, moose, smaller mammals, and potentially elk) currently occurs on Bigelow Gulch Road and on Forker Road and that it is likely to increase with increasing traffic volumes. We agree, and would add that wildlife-vehicular collisions will also increase due to higher vehicular speeds, and the substantially widened roadway -- from the current width of approximately 28' to 70' in rural areas, and to 112' in urban areas). Incorporating effective means to prevent wildlife-vehicular collisions is as important to human safety as it is to wildlife conservation. The cost of wildlife crossings is well justified when you consider the average total costs of each wildlife vehicular collision:</p>	<p>control devices to reduce emissions of NOx, VOC and diesel particulate matter from construction equipment tailpipes is not justified for this project. Spokane County is an attainment area for ozone, so there would little benefit from installing after-market control devices on diesel equipment to reduce emissions of ozone precursors (NOx and VOC). As described previously in these responses, the construction activities that use the largest pieces of diesel equipment (e.g., excavation and grading) will take place for only a few days at a time near any given location along the alignment. For that reason the construction activity is unlikely to cause any substantial air quality impacts related to long-term exposure to localized diesel particulate emissions. Therefore, the suggested diesel emission control devices suggested by EPA's comments would provide relatively little benefit. Furthermore, it is uncertain whether construction equipment fitted such devices are readily available in Spokane County. If the County's bid specifications required all contractors to use equipment fitted with such emission controls, it could limit the number of firms that would be able to respond, and could result in substantially higher construction bids.</p>
			<p>Mention is made in the comment letter that the wildlife road kill will increase due to higher vehicular speed. The speed limit for the project will be 45 mph. The proposed wider roadway and wider clear zone on each side of the roadway would improve the field of view for drivers along this section of roadway. The wider field of view would allow drivers greater time to react to wildlife visible in the roadway or within the clear zone. We agreed that wildlife crossings are the most effective means of preventing wildlife-vehicular collisions, but only where there are established migration routes or movement corridors. Despite the proximity of winter concentration areas of deer in the project area, no known migration corridors cross the project area (see page 4.6-12 of the</p>	

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			<p>\$7,890 for deer; \$17,100 for elk; and \$28,100 for moose (Huijser 2006). Installation of warning signs is appropriate, but use of signs alone has little or no impact on wildlife mortality rates, habitat connectivity, or human safety. Signs alone are not recommended as a mitigation measure for habitat fragmentation or for preventing wildlife-vehicular collisions. (Ruediger, 2007).</p>	<p>Revised EA for discussion) and records indicate that deer collisions are low when compared with WSDOT deer kill data.</p>
40.0	48	10	<p>EPA believes that safe wildlife crossing structures, such as underpasses, would provide the most effective way to establish connectivity and to avoid wildlife-vehicle collisions. Also the Spokane County Planning Policy (T.5.5.) states "Ensure that the transportation systems in the rural areas and resource lands are consistent with their rural/resource character. Improvements should emphasize operations, safety (emphasis added), and maintenance." In this case as in other projects within rural or semi-rural areas that bisect wildlife habitat, we recommend including wildlife crossing structures as part of project design. We appreciate that Spokane County will evaluate the feasibility and benefits of installing a wildlife undercrossing at the Bigelow Gulch Creek culvert crossing at Palmer Road. However, we recommend that this be a study of the placement and design of the wildlife crossing(s) – not limited to a study of the feasibility and benefits. We would appreciate being kept informed on this matter and would be happy to provide research to the project proponents that demonstrates the effectiveness and benefits of wildlife crossing structures.</p>	<p>Historical vehicle-related mortality data for Bigelow Gulch indicate that, while deer collisions do occur, the numbers are relatively low when compared with statewide data, and as mentioned above, no known migration corridors cross the project area. As mentioned in the Revised EA, Spokane County will study the feasibility and benefits of constructing an underpass. The study will also evaluate factors such as location and the type (design) of the underpass.</p>
40.0	48	11	<p>We appreciate that the project proponents included mitigation for wildlife habitat losses. We are concerned; however, that the project would impact 109.4 acres of habitat, and mitigation would consist of 14.4 acres. We recommend that there be efforts to provide additional mitigation to achieve a near 1:1 mitigation ratio for</p>	<p>Thank you for your comments. The mitigation measures defined in the Revised EA were based on obligations under applicable Federal (e.g., ESA), State (e.g., WAC 232-12, Hydraulic Project Approval) and local (e.g., Spokane County Critical Areas Regulations) regulations and policy guidance, interagency agreements, and</p>

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			impacts to habitat, which still would fall short of what would be prescribed by Washington Department of Fish and Wildlife (WDFW) habitat mitigation policy. This further mitigation is important to help mitigate the indirect effect of the project on land development and habitat loss as well as the direct effects.	technical guidance as defined in WSDOT Environmental Procedures Manual (M31-11.01 Part 436). The WDFW mitigation policy (POL-M5002) and mitigation ratio you mentioned is not a part of the WSDOT guidance and applies internally to WDFW procedures. In addition to the environmental commitments for wildlife and vegetation presented in Revised EA and in Attachment D of this FONSI, Spokane County will comply with all conditions (including any additional mitigation measures) set forth in all permits required by WDFW for construction of the project, such as Hydraulic Project Approval, and Section 404 by the Corps of Engineers. WDFW procedures and policies will apply to permits issued by WDFW.
05.4	48	12	Indirect and cumulative effects. An important aspect of indirect and cumulative effects analysis is evaluation of reasonably foreseeable changes in traffic patterns and related growth. While land use changes are the direct result of local planning decisions, there may be indirect impacts associated with transportation projects that affect the rate and pattern of development. A reasonable expectation for this urban connector project is that there will be changes in travel times, which will likely affect trip frequency and length, resulting in overall traffic increases in some areas and decreases in others, yet this type of analysis was not done in this EA.	The expectation that the project will result in a change in travel times and trip frequency and length is already included in the traffic modeling for future conditions (2025). Future traffic volumes were developed based upon the SRTC Interim Regional Travel Demand Model (VISSUM Model). Land uses and zoning may change in the future, however such changes will be driven by the Spokane County and city comprehensive planning process following the State-mandated planning process. Section 4.17.6 of the Revised EA included an analysis of cumulative impacts on land use. Based on current land use and zoning plans, future development will be limited along the Bigelow Gulch corridor. Spokane County has designated this area as a rural residential zone and development is constrained by the County's policies and land use designations. The cumulative effect on land use patterns is likely to be minor unless the County changes land use designations to allow for more urban development in the area.

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05.4	48	13	Concerning land use change, the EA states that although the County can change the zoning, and considers zoning changes on an annual basis, there are no current plans to do so (page 4.7-13). While this is an accurate description of its current state, there are tools available to evaluate likely future scenarios. Some examples are analysis of travel and traffic changes in combination with a Delphi process using a panel of experts to project where the pressures would likely be greatest to effect land use change, or an evaluation of current plans along with trends in zoning and land use changes over the past 10 to 20 years that could be used to determine the likelihood of zoning changes in the future. We recommend that the EA include an analysis of traffic pattern changes and related growth. Such an analysis may also be useful to other efforts, such as the County-wide planning processes and compliance with the County-wide Planning Policies.	Comment noted. While Spokane County has an economic base that includes significant industrial and urban components, it is also a county that takes pride in the agrarian history and cultural aspects of that history that set the path for how it developed as a county. The desire to retain linkages to that past is demonstrated in the zoning of the properties through which the urban connector passes; see Figure 4.7-1 of the Revised EA. There is no known driving force seeking to change the character of this area that would be a precursor to growth. The planning process leads to zoning decisions. Those processes, and those decisions, indicate that the area in study is forecast to remain rural in nature. It is beyond the scope of an EA to undertake the work effort, and the significant expense, associated with a Delphi analysis to examine theoretically possible land use decisions. The results of such studies are debatable and the results are likely to be significantly different from what will actually take place. Should such an analysis be undertaken, it would be more appropriate in a region wide planning study than in an EA. The standard of practice in an EA is to use the existing planning documents and land use for the area in question and age that plan through the life of the design period.
90.0	48	14	Tribal consultation. The Cultural Resources Appendix discusses the ethnohistory of the Spokane and Coeur d'Alene Tribes in the project area. However, we have not noted any documentation of tribal consultation. We recommend the EA include information describing the Government-to-government consultation with Indian tribes, in accordance with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments, and the President's executive memorandum of September 22, 2004.	Tribal consultation was conducted between WSDOT and the Tribes as part of the Section 106 process for this project. The consultation letters are presented in Appendix E, Cultural Resources Assessment of the January 2006 EA and in Appendix 5, Addendum Cultural Resources Assessment of the November 2007 Revised EA.

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40.7	48	15	Invasive Species. Ground disturbing activities create opportunity for establishment of non-native invasive species. In compliance with NEPA and with the Executive Order 13112, analysis and disclosure of these actions and their effects, as well as any mitigation to prevent or control such outbreaks should be included. We recommend that disturbed areas be revegetated using native species and that there be ongoing maintenance (wholly or primarily non-chemical means) to prevent establishment of invasives in areas disturbed by project activities.	Additional Mitigation Commitments have been added to address invasive species. These mitigation commitments have included the preparation of an invasive species control plan and coordination with the Spokane Noxious Weed Board.
55.2	49	1	I want to take this opportunity to express to you my concerns regarding the safety of those traveling on Bigelow Gulch Road. I work at the nursery on the southwest corner of the intersection of Argonne and Bigelow Gulch Road. Over the years I have witnessed accidents, excessive speed, aggressive drivers, road rage and violence. It is an extremely high volume traffic area and the speed of the large transport vehicles mixed with the average size cars, SUV's and light trucks as well as motorcycles makes travel on Bigelow very dangerous. It has narrow shoulders and poor visibility and makes it impossible for anyone to be safe, including emergency first responders who are frequently called to the area. If a vehicle has broken down there is no safe place to get off the roadway. According to the County records, there have been 546 accidents over the last twelve years on Bigelow Gulch Road several of which have resulted in deaths. That in itself ought to bring the widening on the road to the forefront of the project completion list. Please consider improving this death trap and make it safer for all who travel on Bigelow Gulch Road.	Thank you for your comments.
55.0	50	1	I believe the repairs and upgrades to Bigelow Gulch are long overdue and need to proceed as soon as possible. I drive this road to work every day and have for the past	Thank you for your comments.

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55.1	51	1	<p>13 years and have seen the increase in traffic and deterioration of the road surface over the course of that time. Please consider this in your decisions. Thank you.</p> <p>Please go ahead with the Bigelow Gulch project. Spokane needs more and improved flow in its East – West traffic. Failure to do so will only prolong our traffic problems.</p>	<p>Thank you for your comments.</p>
55.0	52	1	<p>Spokane is in desperate need of a highway that connects the northside with the valley. Bigelow Gulch is the perfect road for this.</p>	<p>Thank you for your comments.</p>
55.2	52	2	<p>At this time Bigelow Gulch is a hazard for citizens and for freight companies because of the curves that are on it. I think that widening and straightening it out would make this road much more safer and would lessen the amount of accidents that occur on this road. This project would also make it easier for the freight and other Transportation companies to get to the north side.</p>	<p>Thank you for your comments.</p>
55.0	52	3	<p>This project I think would decrease the amount of truck traffic on Market street. This would also lessen the amount of stress that is placed on the in town streets.</p>	<p>Thank you for your comments.</p>
55.2	53	1	<p>For many years I lived on MacMahan Road off of Forker Road. My view was to the southwest towards Bigelow Gulch. My wife and I saw so many red lights from ambulances and at the time Lifebird coming to the numerous accidents on Bigelow Gulch Road, especially during the winter months. The ups and downs of the road were especially hazardous during the long winter months.</p> <p>I drove that road twice a day and had so many near collisions; I quit using that road and started using Pleasant Prairie Road. The accidents that I witnessed were always severe. I can remember one of the former sheriffs lived on Pleasant Prairie Road, and always commented about the numerous major accidents on</p>	<p>Thank you for your comments.</p>

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			Bigelow Gulch.	
55.1	53	2	With truck traffic coming off of Forker Road, it tremendously compounded the problem with the fast car traffic. Two lanes are needed to alleviate the tragic accidents and as the traffic multiplies in to the future	Thank you for your comments.
55.2	54	1	For the safe of safe driving and a more efficient commute, we need this project to proceed quickly. Do not let a few disrupt the good of the many.	Thank you for your comments.
60.0	54	2	This is an opportunity to save gas thereby saving the environment.	Thank you for your comments.
55.1	55	1	I am all for scenic, pastoral drives through the countryside. But, like it or not, this area is rapidly changing from rural to suburban. This project is long overdue. With increased pressure on I-90 and Trent, Bigelow Gulch is a vital link from the Spokane Valley to Spokane's north side. Traffic volume in this corridor is only going to increase; ignoring the inevitable is only going to make travel more dangerous, in human terms, through this corridor.	Thank you for your comments.
55.2	55	2	With current line of sight issues, driving at night is always treacherous. Winter driving is a roll-of-the-dice day or night. The public will best be served by spending the money now and fixing this problem before more lives are lost and more families are torn apart. Let's save lives!	Thank you for your comments.
55.2	56	1	It is imperative that the safety improvements in this corridor go forward. The lack of shoulders and the condition of the surface make this road hazardous.	Thank you for your comments.
55.2	57	1	Please move forward on the Bigelow Gulch project. The road is much too dangerous as is. I drive this road five days a week to work. Thank you for your consideration.	Thank you for your comments.

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55.0	58	1	This improvement will allow freight haulers and commuters a safer and quicker route of travel from the valley to the north side (NSC).	Thank you for your comments.
05.0	59	1	I am in support of the Bigelow Gulch Construction Project. This is a vital link of transportation between Northeast Spokane and The City of Spokane Valley. Not only is this a means of viable economics, but it will improve safety for all those that travel this road regularly as well.	Thank you for your comments.
55.0	60	1	Ease of distribution methods.	Thank you for your comments.
01.3	61	1	I support the Bigelow Gulch project in Spokane, WA.	Thank you for your comments.
55.2	62	1	The appeal process and comment period has gone on long enough. The safety of the commuter is the main reason for changing or updating or constructing roads. There is no more dangerous road than Bigelow except possibly 395. Enough is enough. It is time to reconstruct Bigelow and make it safe for those who travel on that death trap!	Thank you for your comments.
55.1	63	1	RE: Bigelow Gulch Construction Project. I believe that this project needs to continue so that it will relieve some of the current traffic congestion and to prevent future traffic bottlenecks on Argonne Road.	Thank you for your comments.
55.0	64	1	I am in support of making the necessary adjustments to Bigelow Gulch. This road is dangerous and narrow. Accidents are regular and traffic is continually getting worse.	Thank you for your comments.
55.2	65	1	You need to fix Bigelow Gulch. It is dangerous at best right now and is only getting worse. In the years we have spent just putting a band-aid on it we could have paid for the entire road to be rebuilt.	Thank you for your comments.

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55.2	66	1	I refuse to travel on this road in the winter because of the dangerous curves and icy conditions. In the summer people drive too fast for the curves and makes it extremely dangerous. I think twice before I go on Bigelow Gulch. I was so pleased when I heard they were going to straighten this road. I would use the road a lot more.	Thank you for your comments.
40.0	67	1	Whatever your plans are, would affect the wildlife, please just leave Bigelow alone.	Thank you for your comments.
01.3	68	1	I think the proposed Bigelow Gulch improvement would be a great benefit to the Spokane area residents traveling E. and W. on the NW side of Spokane area.	Thank you for your comments.
55.2	68	2	I have lived in the Spokane area for over 50 years. The last 12 years I have lived on the North side and worked in the Valley. Until this year when my job location changed made Bigelow Gulch the only reasonable way to go, I have avoided using this road for several reasons. Because the existing road has many curves and is tree lined, it is a dangerous road to travel.	Thank you for your comments.
55.1	68	3	In the winter, the trees don't allow sunlight to help melt the ice and the icy curves cause many accidents.	Thank you for your comments.
55.1	68	3	Toward Spokane, where the road goes from 4 lanes to 2, there are always people trying to get ahead of as many people as possible before the road is reduced to 2 lanes. I have had a number of people pass me after the road reduces. There are no shoulders on this section of road; so one driver used the ditch to pass me. I typically drive the speed limit unless conditions require going slower, but the nature of this road itself helps create a hazardous situation.	Thank you for your comments.

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55.0	68	4	A new 4 lane road from the existing one on Francis to the top of the hill on Bigelow Gulch would significantly reduce the number of accidents and help improve traffic flow on a road that is the only route East and West north of Upriver Drive.	Thank you for your comments.
55.2	69	1	This letter is in regards to the realignment and widening improvements that are proposed for Bigelow Gulch Road. I am very much in favor of this work and hope that for the safety of those of us who use this road that this work is not cancelled!  As you are aware, the lack of sun exposure to this windy section of road creates an environment that is icy, dark and slick much of the winter season. These shaded low-lying areas create a dangerous environment even for careful drivers. The combination of tight and blind corners with a narrow roadway makes for a hazardous driving condition any time of the year!  As a county resident and user of this stretch of country road, I ask that you please consider this request to move forward with these planned improvements to this stretch of dangerous road.	Thank you for your comments.
35.0	70	1	There are many springs on the hill and the flat area where the road is going.	Thank you for your comment. Groundwater was addressed in section 4.2 of the Revised EA. Environmental commitments to address groundwater are presented in Attachment D of the FONSI.
40.5	70	2	The government planned to have turkeys planted here and if the road goes there many will be killed.	As indicated in section 4.6 of the Revised EA, wildlife habitat will be reduced as a result of the project. This reduction of habitat could also include non-native (artificially stocked) turkeys which have been expanding their range and density into more urbanized areas of Spokane County (WDFW 2005). Turkeys often avoid or abandon habitat adjacent to frequently and heavily used

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				roads (WDFW 2005).  Washington Department of Fish and Wildlife. 2005. Washington State Management Plan for wild turkey, November 2005 – June 2010. Olympia Washington. <a href="http://wdfw.wa.gov/wlm/game/water/turkey/management/2005-2010turkey.pdf">http://wdfw.wa.gov/wlm/game/water/turkey/management/2005-2010turkey.pdf</a>
60.0	70	3	The students will be breathing much more gas and diesel fuel.	Please see Attachment A (Additional Information) regarding air quality (particulate matter and Mobile Source Air Toxics), and response to letter 48 comments 48-4 through 48-8.
40.0	70	4	Many trees will have to be removed and create a slide situation for the road and houses below.	Please see section 4.1 Geology and Soils regarding construction on slopes, and Environmental Commitments to address geology and soils presented in Attachment D of the FONSI.
65.0	71	1	From our home on Jacobs, we can already hear motorcycles and trucks from the freeway over a mile away, not to mention the trains. Now we will have the trucks ½ mile away.	Thank you for your comments regarding noise.
55.2	71	2	There is also a school bus stop at Jacobs; some children would have to cross 5 lanes to get to the stop. What about people who ride to work? Will a safe bike and sidewalk be created?	School Bus routes are required to serve each side of the roadway on all roadways with 3 or more lanes (see RCW 28A.160.115). Therefore, children will not have to cross the road to access the bus stop. The urban sections will have sidewalk and bike lanes. Rural areas will be provided an 8-foot shoulder.  Please see response to comment 29-4 regarding bicycling. Sidewalks will be provided along the 0.8-mile length of the proposed roadway at the eastern end of the project (i.e., Sullivan Road).
55.2	72	1	Bigelow Gulch is a dangerous road that is falling apart. It needs to be changed in order to ensure the safety of the people who have to travel it every day.	Thank you for your comments.

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55.2	73	1	This road needs to be fixed. There have been many accidents on this road. We have had several employees roll their vehicle over during the winter months.	Thank you for your comments.
55.1	73	2	We are limited on our options for getting trucks out of town. We use this road a lot. We do divert our trucks during some of the winter months due to the danger. This causes other surface streets in Spokane to handle the additional traffic.	Thank you for your comments.
01.3	73	3	Please move forward and get this project completed!	Thank you for your comments.
55.0	74	1	The Bigelow Gulch Road is in urgent need for expansion/improvements to handle the existing and future traffic for reasons of safety, environmental (transporting hazmat materials) and economical vitality.	Thank you for your comments.
55.2	74	2	This road is the main corridor between the Spokane Valley and North Spokane. Moreover, when the completion of Hwy 395 and Hwy 2 juncture drops onto Francis, which route do you think the eastbound traffic will take? Automobiles and trucks will take the Bigelow Gulch route whether it is in the current unsafe condition or whether the Spokane County makes the planned improvements. Our company and employees use Bigelow Gulch daily.	Thank you for your comments.
55.0	74	3	Please implement the design to widen the road to five lanes and straighten the dangerous curves for the safety of our families, friends, and employees. This route needs to remain at 45 mph with limited stoplight intersections to allow steady flow of traffic.	Thank you for your comments.
55.2	75	1	With all the deadly accidents on this road and it being a major route between the Northside and the Valley I feel it is of major importance to complete this project.	Thank you for your comments.

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55.2	76	1	This area has been a safety hazard for too many years. There should be no question about fixing this road and the sooner the better! The number one priority and concern should be for the human lives that travel this route in foul weather.	Thank you for your comments.
55.0	77	1	This project would greatly improve the safety and efficiency of the commute between north Spokane and Spokane Valley. As funding is already approved...please proceed ASAP!	Thank you for your comments.
55.2	78	1	Bigelow gulch is a hazardous road due to insignificant light and potholes, which is a potential for disaster. You need to see and if you can't see then you don't know what you're looking at.	Thank you for your comments.
45.0	79	1	By changing from 2 lanes to 4 lanes and eliminating my access to [illegible] which I've used for 25yrs. (Documented).	Based on our meeting with you in early January 2008, it is our understanding that you are in the process of obtaining legal access across the parcel in question. Once legal access and an Approach Permit are obtained, Spokane County will provide an access to the roadway.
55.2	79	2	You have made it unsafe for me to access my property.	See response to comment 79-1 above
55.2	80	1	At the present time we do not allow our trucks to use Bigelow Gulch is the winter time because of the unsafe conditions.	Thank you for your comments.
55.1	80	2	They have to use Market Street which causes more congestion and takes longer to get to our valley and Idaho/Montana locations.	Thank you for your comments.
55.2	81	1	Bigelow Gulch needs to be changed. The number of accidents and the potential of a fatal crash on the existing road is a real problem. Not taking charge and correcting this problem is irresponsible.	Thank you for your comments.

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55.2	82	1	As one of the main links from the North side of Spokane to the Spokane Valley this project needs to proceed forward for a safer corridor for both truck and personal traffic. Bigelow Gulch has always been a safety concern for traffic especially during winter months and needs fixing.	Thank you for your comments.
55.1	83	1	I am writing this letter in support of the Bigelow Gulch Road Improvement. Currently on Bigelow Gulch there is a heavy volume of traffic that uses this road and the traffic will only get heavier as more homes are built off Wellesley, Argonne and other surrounding areas. Over the last few years I have noticed the traffic getting heavier not lighter.	Thank you for your comments.
55.2	83	2	Making the road safer for this large volume of traffic should be a priority. The road is a very winding, 2 lanes road that gets very icy in the winter which makes it hazardous. Traffic also bottlenecks when a vehicle attempts to make a turn that crosses lanes. Making the road safer for this large volume of traffic should be a priority. Argonne is a very congested road during rush hour and with the improvement of Bigelow more vehicles would bypass Argonne and take Bigelow out to the valley. It is also very difficult for emergency vehicles to get through traffic. I realize that some of the local residents do not want this project to go through, but traffic volume will not decrease so at the least the roads should be safe for them to drive on. This should not be ignored and hope that the problem will go away instead the improvement should be carried out for those who use Bigelow Gulch for their daily commute.	Thank you for your comments.
01.1	84	1	I sent the original version of this letter to MS Wheatley-Billeter with Attn: Mr. Hemmings as listed in your notice extension of the comment period for the Bigelow Gulch road. I have been informed that is not the person who needs this letter and that person is you. If this is	Your letter was sent to the correct location

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01.1	84	2	<p>I am writing as the Vice Chair of the Hillyard Neighborhood Council (HNC). We are identified by the City of Spokane with the responsibility for neighborhood planning efforts in the Hillyard Community. Though other relationships locally, we also work closely with the City neighborhoods of Bemiss, Whitman and Minnehaha, (and the County neighborhood of Morgan Acres) all of which are affected by traffic delivered by Francis Avenue, the primary arterial at the west end of the Bigelow Gulch project.</p>	Thank you for your comment.
55.2	84	3	<p>(1) From a safety perspective, we are glad to see that Bigelow Gulch road will be upgraded to four lanes, as this will reduce the large number of accidents that now occur there. County statistics displayed at the recent Open House dramatically displayed this need.</p>	Thank you for your comment.
55.1	84	4	<p>(2) We note with relief that the new roadway is not intended to be a truck route; we understand that, due to the light construction of the road bed, the roadway will be unsuitable for heavy vehicular traffic. However, we believe planning for the route ignores at least two likely conditions that will seriously impact the livability and health and safety environments of our neighborhoods:</p> <p>(a) The propensity of traffic to seek the fastest and least congested route between two points, thus encouraging new vehicular traffic to traverse NE Spokane City and adjacent County neighborhoods, and</p> <p>(b) The likely worsening of intense traffic conditions, which already degrade public safety and health and</p>	<p>See Section 2.2 of the Revised EA, Purpose and Need, Freight is one stated purpose and therefore the roadway will be designed to carry heavy vehicular traffic. The project will not encourage new vehicular neighborhood traffic but connect at already designated arterials. Freight connectivity and use has been a stated element of the purpose and need for this facility since the conception of the project. Accommodation of existing and future freight needs appears in the purpose and need statement in the January 2006 EA.</p> <p>One of the main reasons for high service level arterials is to provide a service level dependable enough to eliminate the use of neighborhood streets as perceived time savers. This facility should reduce the use of neighborhood streets by traffic not destined for those neighborhoods and incidentally improve the safety and</p>

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55.0	84	5	To a minor degree, East-West traffic between East Valley and Northwest County destinations are already funneled by Bigelow Gulch road. Planned improvements create a more-favored route between these locations, the equivalent of a "NE bypass"-a means for autos to avoid congested downtown I-90 exits in favor of a less-developed, -congested, -time-consuming route.	Comment noted.
55.1	84	6	(4) NE Spokane arterials already carry heavy daily worker-commuter traffic between North City and County residential areas and work and business places in the Central, Southern and Eastern districts. As an east-west route that avoids downtown congestion, Bigelow Gulch Road will funnel much of this traffic directly to and from the Francis Avenue-Market Street corridor.	Comment noted. Francis and Market Avenues are arterials, their purpose is to carry traffic into and through the city core. This new facility will allow longer trips, from urban center to urban center or to other areas of the community, to access the NSC, I-90, and the remainder of the arterial network more efficiently. The improved efficiency is expected to reduce the use of neighborhood streets for arterial type trips as there will be no time saving incentive to do so.
55.1	84	7	West-bound traffic will selectively prefer Bigelow Gulch via Sullivan and Argonne, over I-90 and downtown congestion. The intersections at Francis-Market/Haven; Francis-Crestline; Francis-Perry; and Francis-Division will be hit first by this increase; ancillary impacts will be among homes, schools and neighborhood institutions on the lesser residential streets.	Francis Avenue is an arterial that is designated to carry arterial traffic volumes to facilities such as the Connector. There should be no ancillary impacts to residential streets due to the Connector project. The Connector does not change the origins or the destinations of the trips, but rather provides a choice along the arterial system to more effectively achieve each trip. Given the opportunity to conduct a trip on a high service level arterial system, most if not all drivers will spend as large a portion of the trip as possible on that arterial system rather than on neighborhood streets. Note, that there are on-going discussions regarding the extension of SR291 to Division and to the North/South Freeway.

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55.1	84	8	North County and City eastbound traffic also will seek to avoid downtown congestion, further loading Francis Avenue into Bigelow Gulch Road, but also further impacting east-west arterials (Wellesley, Garland/Empire) in the City as unintended—or at least un-discussed—consequences. Increased northbound traffic on Market and Crestline (among others) will also be a result.	The transportation model developed for this project includes all major roadways in the County and takes into account the systemwide shifts in traffic expected to occur as a result of the project. Model volumes did not indicate that increases in traffic would occur to the extent that operational problems would result on nearby roadways.
55.1	84	9	A possible miscalculation in the present plan may involve heavier commercial trucks. Without appropriate (freeway) alternatives, large volumes of heavy north-south commercial truck traffic already crowd these streets (Division, Crestline, and Market). For the same reasons that private citizens seek less congestion, commercial vehicles seeking time- and fuel-saving routes will be drawn to Bigelow Gulch Road (despite its planned light-duty construction). We are already concerned with the heavy north-south truck traffic on Market-Haven, Freya, Crestline and Division Streets. Some of this may be mitigated by the re-routing of some heavy traffic on the new route eastbound.	The proposed Connector Project will not be of “light-duty construction” it is to be constructed to accommodate freight travel. The Connector is actually expected to lessen impacts to the streets indicated in the comment. A review of the comments on this EA will show that freight haulers have indicated a need for the project and are on record as directing their carriers to not use the existing Bigelow Gulch corridor due to the safety issues associated with it at present. The Connector will provide an improved, safer, and more timely traveled facility that should attract those diverted trips to the connector route from the routes they are now using to bypass Bigelow Gulch.
55.1	84	10	To the extent new westbound traffic will come to the area, we are concerned about further erosion of the safety and livability of our neighborhoods. Specifically, these impacts include:  -Physical dangers to pedestrians and other vehicular traffic by adding additional traffic to roads and streets not designed for this load;  -Similar dangers on no-little-used residential streets, as they become alternate routes for motorists attempting to avoid arterial congestion;  -Health dangers of exhaust and pollutants from the traffic increases that will surround and infiltrate the residential and commercial areas;	See 84-4, 84-7, 84-8 & 84-9 above. The Connector Project should also improve quality of life elements such as those mentioned in this comment by reducing the use of neighborhood streets. Traffic should be attracted to the connector, improving conditions for bicyclists, pedestrians and residents by reducing conflicts with non-neighborhood users. This should also result in a reduction in exposure to non-neighborhood vehicle noise, exhaust, and other health dangers.

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03.5	84	11	<p>-Livability degradation caused by increased traffic, related dirt and grime, and noise pollution.</p> <p>It is one thing to plan well for the upgrade and maintenance of an existing thoroughfare to benefit those directly adjacent to its route. It's another thing to look at and plan for the impacts on those living at either end. As one neighborhood directly impacted by the future, successful upgrade of Bigelow Gulch Road, we wish to be included in the future discussions regarding this important project.</p>	<p>Thank you for your comments. Spokane County will include all affected neighborhoods, including yours, in future discussions during design and construction of this project.</p>
01.3	85	1	<p>As a way of introduction, our company Crown West Realty, LLC owns and operates the Spokane Business and Industrial Park. This is the largest industrial park from the Pacific Ocean to the Minneapolis/Saint Paul area. With over five million square feet of buildings and in excess of 5,000 employees, safe and reliable transportation corridors are very important to us and our tenants. We therefore were very pleased when the Bigelow Gulch and Forker Road improvement plans were announced.</p>	<p>Thank you for your comments</p>
55.0	85	2	<p>As it currently exists, Bigelow Gulch Road is a northside corridor with serious issues, both for ease of transportation and for life safety. I have commuted on this road in excess of twelve years and have seen a dramatic increase in traffic. This corridor was never designed to carry the current traffic count, much less the great numbers of semi trucks and larger vehicles that are utilizing it. It has come to my attention that the "Prairie Protection Association" is opposed to improvement of this corridor for ludicrous and self-serving reasons.</p>	<p>Comments noted.</p>
55.1	85	3	<p>I love the outdoors and am an avid hunter and outdoorsman; but I also recognize the need for improvement of transportation corridors. As the road is</p>	<p>Comments noted.</p>

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05.2	86	1	<p>overused now and traffic use continues to grow, non-action is not an option. Even if the corridor isn't improved, traffic will increase, as will the accidents and deaths associated with its use. Therefore, I urge you to continue with your improvements and bring the plan to fruition.</p> <p>There is no budget included in the revised EA whereas a \$23 million budget was published in the 2006 document. Figures posted at the Public Open House on November 14, 2007 were different from in the 2006 EA.</p>	<p>Thank you for your comments. We apologize that the project cost was not presented in the front chapters of the Revised EA. It was presented in Chapter 5 (page 5-13) as \$52.6 million and in response to comment 163-18 in Appendix 3, Table 3-3 Response to Public Hearing comments. This cost estimate is more current and most accurate than the cost estimate provided in the 2006 EA.</p>
55.0	86	2	<p>I question the reference in section 2.5 regarding the 4 to 10 million tons of freight carried by trucks annually on the Bigelow/Forker Corridor. Are there actual data to support the true number of tons? I am asking this question as the number of containers going by rail through the Spokane area has increased over the last three years which may have impacted the truck freight carriers. The traffic flow studies also that the volume count in 2007 is the same as 1994 (4.9-2,-3). These figures indicate they also are what is projected for 2025 (12,000) if no changes are made to the current infrastructure (2.3). Are these figures accurate?</p>	<p>Please see response to comment 88-17</p>
45.0	86	3	<p>If one of the policies as stated in section 2.5 is to ..."support the creation and preservation of communities and neighborhoods while providing safe and efficient movement of people and goods", why is this super wide roadway proposed that is to temporarily handle the future traffic from the first phase of the North Spokane Corridor? (ES-2) Once the road is built through the Orchard Prairie Community, forever dividing it, how will the neighborhood ever return to its original rural setting once the North Spokane Corridor is open?</p>	<p>Comment noted. As stated in the Revised EA, the proposed roadway is based on year 2025 traffic volumes and with the assumption that the North Spokane Corridor will have been completed to I-90 by that year. The need for the road is based on traffic projections following completion of the North Spokane Corridor to Francis and completion to I-90. The question of dividing the community was presented in section 4.16.5 of the Revised EA. Also, please see responses to comments for letter 96 regarding the North Spokane Corridor.</p>

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03.5	86	4	The current appendices, which include the transcript of the comments taken at the public testimony on March 22, 2006, do not include the comments of the County Engineer, Ross Kelley, which were interjected into the hearing is to be accepted as all inclusive, it would appear that Mr. Kelley's comments should have been noted. A representative of Jones and Stokes who prepared the EA document commented at the Open House in November 2007 that the engineer's comments had been deleted.	Comment noted. As mentioned in Appendix 3, Table 3-3 presents excerpts of the hearing. The official transcript is available for review on the Spokane County website or from the Spokane County Public Works' office. The comments given by the public during the hearing and the official Spokane County responses are presented Table 3-3 of Appendix 3. The written responses to that testimony were presented in Table 3-3 in lieu of comments provided by Ross Kelley.  Related to transportation projects in the State of Washington, Public Meetings allow for presentation, dissemination, and gathering of information, including two-way interaction, question asking and answering, and even debate. Public Hearings are to gather information from the public on a proposal; there may be information presented, and exchange of opinion or information at some location within the venue, but when the information is gathered for the record that information is recorded either on tape, by court recorder, or both, and are generally no responses except for possible clarification of an item by the agency conducting the information gathering. Both meeting types, as well as other methods, are used when conducting an effective public involvement program. The purpose of Public Hearing is to "hear what the public has to say."
55.2	86	5	The Bigelow Gulch/Forker corridor can be made safer with wider shoulders, a center turn lane, and a lowered speed limit to 35 mph. Currently the roadway receives minimal upkeep and patrolling, both of which would improve the safety of the roadway.	Comment noted. Please see response to comment 1-7 above.

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03.5	86	6	Procedurally there has been a lack of opportunity for public input on this project since it was first proposed in the early 1990s. The first general knowledge of the magnitude of the proposal was in February 2006. Prior to that the only community meeting regarding the Bigelow/Forker connector was in 2000. In February 2006 the community was given 45 days to respond to a several hundred page EA. Several extensions of the comment period were granted which still did not allow sufficient time for materials to be requested and received through the public documents law so citizens could make informed comments.	Comments noted. Please see section 1.3 of the Revised EA and page 3 of the FONSI regarding the public involvement conducted for the January 2006 EA and the November 2007 Revised EA. The comment period granted for the January 2006 EA exceeded comment periods for NEPA EAs and 4(f) Evaluations (45 days) or NEPA EISs (45 days).
05.0	86	7	Finally, since this project was proposed and developed during the latter part of the 20th Century and is now nearing the critical stage of being implemented in the 21st Century, a number of factors have gained momentum and need to be considered; namely, global warming issues, price of oil, changes in how freight is transported, moves to look at mass transit rather than relying on the single occupant gasoline powered vehicle, and probably the most critical issue of completion of the North/South Corridor to I-90 and the Bigelow/Forker project being a distracter. These all need to be thought about as the irrevocable damage of a major highway threatening rural neighborhoods is about to begin.	Comments noted. Please see response to Comment 88-18 and response to comment letter 96 regarding the North/South Corridor.
05.0	87	1	Every time this project is discussed, it grows in size and purpose. In 2006 there were five benefits listed:  -Improved safety for vehicles, pedestrian, and bicycle users in the corridor. -Reduced number of head-on collisions; -Improved travel times and reduced congestion during peak hours; -Improved air quality from reduced numbers of idling	Thank you for your comments. Freight linkage is a designated project purpose (please see section 2.2.1 Purpose and Need of the Revised EA and the section regarding Freight Transport. Freight connectivity and use has been a stated element of the purpose and need for this facility since the conception for the project. Freight is considered and appears in the purpose and need statement in the January 2006 EA.

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			<p>vehicles at intersections; and</p> <p>-Increased capacity to temporarily handle the future traffic from the first phase of the North Spokane Corridor.</p> <p>When the thing reappeared in 2007, two new benefits were added:</p> <p>-Reduced pollutant loading from the roadway as a result of stormwater treatment and detention; and</p> <p>-Improved freight mobility.</p> <p>Why was the latter added? Could there be road-building money in "freight mobility?"</p>	
03.0	87	2	<p>On page 86 of the Appendices for the Revised EA, I suggest in a letter to Bill Hemmings that he and his team "know that you're building a partial alternative to the North-South Freeway under the guise of a county road safety improvement." They respond to this comment by saying:</p> <p>"The project does not provide an alternative to the North Spokane Corridor (NSC) rather Bigelow Gulch Road does connect through Francis Ave to a major interchange on the NSC."</p>	<p>Thank you for your comments. The Bigelow Gulch Urban Connector is not intended to remove the need for the NSC. All traffic modeling done includes the NSC, which will carry significant amounts of traffic. The NSC and the Connector project will ultimately serve different purposes for different trip types. Please see responses to Letter 96 and comments in Letter 100 regarding the North Spokane Corridor.</p>
03.0	87	3	<p>How does this square with the published "project benefit," of "increased capacity to temporarily handle the future traffic from the first phase of the North Spokane Corridor."</p> <p>What is the truth about the purpose of this project?</p> <p>Is this a safety improvement to a county road, or a de-facto completion of the North South Corridor? What does "temporarily handle the future traffic" actually mean? How long is "temporarily"? How much traffic?</p>	<p>The Connector is a safety and capacity improvement to an existing County Road. For the period of time after the completion of the Connector and prior to the completion of the NSC, there may be use of excess capacity on the Connector between I-90 and the partially completed NSC. That does not change the purpose of the Connector to something other than a link between urban centers.</p>
55.1	87	4	<p>Have there been any honest studies to determine the amount of traffic the half built state highway will dump</p>	<p>The need for the Connector will continue to exist after the completion of the NSC. The two facilities provide</p>

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05.5	87	5	<p>unto this county road? And when “temporarily” ends, what happens to the temporary highway? Is it rolled up and the countryside restored?</p> <p>This project was originally conceived in the 20th century as a safety improvement. Oil was \$30 a barrel, no one took global warming seriously, and Ross Kelly believed that he could sneak his grand scheme through in small pieces.</p> <p>We’re now well into the 21st century, and if this county road is going to be the South end of the North-South Corridor, even temporarily, it’s impacts should be studied with a full and honest EIS.</p>	<p>separate and distinct functions. Long distance trips heading to I-90 will use the NSC, trips between the urban centers at each end of the Connector will use that facility.</p> <p>Thank you for your comments. Please see responses to Letter 96 and section 1.4 of the Revised EA regarding NEPA EA and EIS.</p>
05.2	87	6	<p>Apparently there’s a clock running on certain aspects of the funding and the engineers of Spokane County feel the need to ram this through before the time runs out. Is that a legitimate reason to push this ill-considered project thru fast-track approval?</p>	<p>Comments noted. As mentioned previously in comment 86-6, this project has been in planning for over 10 years and is not being fast-tracked.</p>
05.5	87	7	<p>“Many words, nothing said.” – Ancient Chinese Proverb  Both the 2007 Revised EA, and its 2006 predecessor, are bloated and self-contradictory documents that try to be comprehensive substitutes for a full EIS.  The WSDOT Project Development Office provided the following, in July 1988.  “Environmental Assessment Outline”  Preface  This outline is provided for the guidance of preparers and reviewers of Environmental Assessments (EAs): It is intended to ensure that EAs are complete and in compliance with National Environmental Policy Act (NEPA) regulations 40 CFR 1500 to 1508, and Federal Highway Administration (FHWA) regulations and guidelines set forth at 23 CFR 771, and in Technical Advisory T 6640.8A.</p>	<p>Comments noted. As stated in previous responses to comments, the need for a full EIS will be determined by FHWA following review of the Revised EA. The EA was prepared following the U. S. Department of Transportation Federal Highway Administrations Technical Advisory (T 6640.8A October 30, 1987) <a href="http://www.fhwa.dot.gov/legregs/directives/techadvts/t664008a.htm">http://www.fhwa.dot.gov/legregs/directives/techadvts/t664008a.htm</a></p> <p>As mentioned, the page length is a guideline. EAs vary considerably in length depending on the complexity of the project and the environmental elements evaluated.</p>

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			<p>An environmental assessment must be prepared for all actions involving Federal funds and/or approvals which do not qualify as a categorical exclusion and do not clearly require an environmental impact statement (EIS). The purpose of an EA is twofold. First, an EA should resolve any uncertainty as to whether an EIS is needed. Should the need for an EIS become evident at any time during the EA process, one should be started. The second purpose of an EA is to provide sufficient information to serve as the record for all environmental approvals and consultation required by law.</p> <p>If an EIS is not required, the EA is made available to resource agencies and the public for a 30-day review and comment period. Following public availability period, an erratum is written, or the EA is revised, or a supplemental EA is prepared, as appropriate, to (1) describe changes to the proposed action of mitigation resulting from comments received on the EA or at the public hearing, if one is held; (2) include any necessary findings, agreements, or determinations (e.g., wetlands, Section 106, etc.); and (3) include a copy of pertinent comments received on the EA and the agency's responses to the comments. This supplemental EA is then submitted to FHWA along with a copy of the public hearing transcript (if one is held), and a request for a finding of no significant impact (FONSI). IF FHW A concurs with the finding, the EA process is completed with a determination that the action will have no significant impact to the environment (the FONSI), issued by FHWA.</p> <p>This EA outline is designed to be a guide. It should not be viewed as an inflexible format for every EA. Although the regulations do not set page limits, the Council on Environmental Quality recommends that the length of EAs usually be less than 15 pages. To minimize volume, an EA should use good quality maps and exhibits. Background data and technical reports should</p>	

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			be incorporated by references and summarized to support concise discussions of the alternatives and their impacts.”	
			Both the 2006 and the 2007 Revised EA stand in bold contrast to the guidelines above. They’re not 15 pages. They’re more like 15 pounds. The guidelines state: “The purpose of an EA is twofold. First, an EA should resolve any uncertainty as to whether an EIS is needed. Should the need for an EIS become evident at any time during the EA process, one should be started.” Why did the Spokane County Engineers completely ignore this? Why did they create this preposterously huge EA instead of starting an EIS? It’s clear that by avoiding a full EIS, the County Engineers believe they can sneak this project through without honest analysis.	
45.0	87	8	-The project is outside the urban growth boundary -It is out of keeping with the Growth management Act	Comment noted. Please see sections 4.7 and 4.16 of the Revised EA regarding land use and the Urban Growth Boundary. The inclusion of the Connector in the long range transportation plan for the County and the results of the related transportation models validate the need for the facility.
55.1	87	9	-The EA recognized plan of funneling traffic from the NA Corridor to I-90 is an inappropriate use of a county road	Please see responses to letter 96 regarding the North/South Corridor. Also see response to comment 87-3 above.
03.5	87	10	-The EA’s appendix illegally expunged former Engineer Ross Kelley’s comments given during public testimony	Please see responses to comment 86-4 above.
03.5	87	11	-It ignores and is dismissive of thoughtful comment. It is structured to accent its own correctness, using itself as proof, and neutralizes and adverse comment as being irrelevant.	Comment noted.

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55.1	87	12	The traffic data is insufficient, outdated and contradictory	See responses to comments to Letter 88 regarding traffic data.
55.2	87	13	-It manipulates the safety concerns that justify the road improvement to implement freight mobility which is the job of a state highway.	Please see response to comment 87-1. Freight is carried on all levels of roads, from farm to market roads to Interstate Highways. Local Agency (city and county) roads and streets provide a vital element in the effective movement of freight. That is the distribution of freight movement from the high capacity long distance type state and inter-state facilities to the areas where the freight is either to be shipped from manufacture or production or delivered to for distribution and consumption. The need to consider local agency streets and roads in the freight movement network is essential because they are essential to the movement of freight.
05.5	87	14	-A temporary traffic substitute for the NS Corridor deserves a full EIS	Please see responses to letter 96 regarding the North/South Corridor and comment 87-7 above.
05.2	87	15	-It diverts funds and stagnates for the NS Corridor deserves a full EIS	Comment noted. Please see comments from letter 100 and all the responses to comment letter 96.
05.0	87	16	-There is no budget in the document	Please see response to comment 86-1 regarding project cost.
45.0	87	17	-It is an inappropriate drop off from 395 asking neighborhoods to shoulder the burden	Comment noted. Please see response to comment letter 96 regarding the North/South Corridor
60.0	87	18	-It pays no attention to the concern for global warming or high fuel costs. All road projects should be aiming at a neutral carbon footprint.	Comment noted. As proposed, this project will reduce travel distance, travel time, and delay time; which should contribute to consuming less fuel and producing fewer greenhouse gases.
03.5	87	19	-The EA calls for support and preservation of communities, and then dismisses all concern offered by comment	Comment noted. Due to public input and comment, the review period was extended for both the first and second versions of the EA. The second version of the EA considers many issues raised by the community through their comments on the first publication of the EA. Throughout the document, and the public involvement

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03.5	87	20	On April 28, 2006, I submitted the following letter. It appears, edited, in the Appendixes Revised EA as letter #153. I wish to resubmit it now, because it's still the truth and I hope to at least have the issues raised actually addressed.	process, the County has offered to work with the community in the design and construction of the facility. This would seem to demonstrate the public involvement process.  All comment letters received for the EA are posted on the Spokane County website at: <a href="http://www.spokanecounty.org/engineer/BigelowGulch_RevisedEA/PublicComments/Bigelow_March_2006_Comment_Letters_tagged.pdf">http://www.spokanecounty.org/engineer/BigelowGulch_RevisedEA/PublicComments/Bigelow_March_2006_Comment_Letters_tagged.pdf</a>
03.5	87	21	The above referenced enclosures, written and video, were not published in the Revised EA. They were neither referenced nor rebutted, they were ignored. No explanation or apology was offered. The flawed public process they document was in no way addressed. Neither the written nor video evidence can be found online at the County's website. It's as if I never offered this testimony.	DVDs of the February 2006 meetings and the video are available at the Spokane County Public Works office. As previously mentioned, Appendix 3 of the Revised EA includes coded excerpts of the comment letters with responses, with the letters posted on the Spokane County website as mentioned above in response to comment 87-20.
03.5	87	22	The only response I received was the published response, "Comment noted. Please see section 1.2 regarding public input."	Please see response to letter 87 comment 21 above.
03.5	87	23	Following the illegal and disastrous "open houses" of February 15 and 16, 2006, there was public outrage. An investigation by Spokesman-Review reporter Jim Camden revealed the illegal process of these "open houses." (Please read the attached article by Camden, the Editorial by the Spokesman-Review, the Letters-to-the-Editor, and Op-Ed piece by Don Hamilton published by the Spokesman-Review.)	Proper public meetings were held, and proper public comment opportunity was provided to gather public input from the community related to this proposed project. The newspaper articles mentioned by the commenter are available in the pdf of all comment letters received for the November 2007 Revised EA. Please refer to letter 87 of that pdf. Those letters can be found at: <a href="http://www.spokanecounty.org/engineer/bigelowgulchforakerconnector.asp">http://www.spokanecounty.org/engineer/bigelowgulchforakerconnector.asp</a>

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03.5	87	24	<p>As a result of this public outcry Ross Kelley and Company decided to stage a "public hearing" on March 22, 2006. here Mr. Kelley's contempt for the citizens of our community was elevated to a new and staggering level.</p> <p>At the meeting on February 16, 2006, my questions were ignored and members of Ross Kelley's team repeatedly insulted me. (Please see the attached video "Two Party Consent"). That evening armed Spokane County Deputies threatened me. Uniformed officers who seemed to be serving as Ross Kelley's personal political security detail. This intimidation had a chilling effect on my wish to participate any more of his meetings. I was legitimately afraid to attend the "hearing" on March 22, 2006.</p> <p>I'm told by some who did attend, that as people came forward to make their witness, Mr. Kelley intimidated them by actually attacking and rebutting their testimony as they were offering it.</p> <p>In the Appendices for the Revised EA of 2007, there are pages of testimony offered by citizens on March 22. But all of Ross Kelley's words of rebuttal and intimidation are edited out.</p> <p>Please see the attached copy of the unedited transcript found on the County's website. Please read Ross Kelley's improper and intimidating comments.</p>	<p>Comment noted. Please see response to comment 86-4.</p>
03.5	87	25	<p>And now comes the 2007 public input process. At least Ross Kelley has moved into the private sector, and there are no armed men misquoting the law at the open houses, but the County Engineers are clearly still in a big hurry to ram this thing through before anyone knows what's happening. Any they're ignoring the law again.</p>	<p>Comments noted. There is no indication that any laws have been ignored in the development of this project or the environmental process and documents related to it.</p>
03.5	87	26	<p>On page 1-14 of the 2007 Revised EA it clearly states that an EA should feature a "normal 45-day review period."</p>	<p>Comment noted. The 45-day comment period was set for the 2006 EA because of the required agency review of the 4(f) Evaluation. A 30-day review period for the</p>

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			So they publish a notice of a 30-day review period beginning November 8, 2007 and ending December 8, 2007. Just in time for Thanksgiving. Some of my neighbors said they just couldn't read or respond in a meaningful manner. They just gave up.	Revised EA was set since the 4(f) Evaluation had previously been completed for the 2006 EA. The 30-day review period was subsequently extended to 64 days to January 11, 2008.
03.5	87	27	<p>In January of 2006 the citizens of Orchard Prairie were confronted with a proposal to expand Bigelow Gulch Road into a super-highway. The project was to be built through the center of our community. We were given 30 days to comment.</p> <p>He directed the Department of Roads and Engineering to extend the thirty-day comment period. With the extra weeks he provided, we were able to understand the proposal and make an informed response. Many of our neighbors were able to participate in the process. We raised issues serious enough to motivate considerable reexamination of the County's proposal.</p> <p>For the last year, we have made repeated and continued requests for updates on the project, but the first hard information we've gotten from the County came approximately 10 days ago.</p> <p>The project has suddenly returned and we've just received a new, significantly larger document than the original 2006 EA and are given thirty days to comment.</p> <p>With just day's notice, the County advertised and held an "open house" and now, only 12 days after that, we're asked to off serious, thoughtful testimony at a formal hearing.</p> <p>A preliminary scan of this vast new document scan of this vast new document reveals many areas of serious concern. This project, as it seems to be advancing, threatens the very existence of our community.</p> <p>We will be harmed unless the comment period is extended. The November 26th hearing should be</p>	<p>Thank you for your comments. The comment period was extended to 64-days. The Connector project has not "suddenly returned" it has been a recognized need and planned transportation improvement for many years.</p> <p>The County has been conducting continuous on-going engineering and environmental work toward the development of this project for over a decade; note the first accident data investigated contains information from 1994. Please consider that during this second EA review period alone there are 62 comments directly supporting the need for the construction of this improvement as demonstration of the support for the Connector.</p>

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			<p>postponed or, failing that, at least one more hearing should be scheduled at a later date, giving us time to analyze this huge document and solicit analysis from our neighbors and experts in the related fields.</p> <p>Please keep in mind that private citizens have jobs, families and other obligations that make it difficult to suddenly devote the amount of time it will take to understand this document.</p> <p>The present rushed schedule, especially in the midst of the holiday season, is burdensome.</p> <p>We respectfully request that again you exercise your prerogative and increase the comment period by at least 120 days to give our neighbors a realistic opportunity to understand and respond to the latest version of this massive, multi-million dollar highway project.</p>	
03.5	87	28	<p>This has been a great hardship to try to understand and react to this bloated and flawed EA. With Thanksgiving, Christmas, and the end of the year wrap up of my business, it's been real burden. How many man-hours were spent over how long a period and at what financial cost to prepare this massive document and under financed citizens are the only real watchdogs of the process. It's unfair.</p> <p>There never was a published 45-day review period. There was a published extension, but that doesn't replace an appropriately advertised correct comment period. This is not a harmless error. As I said, some of my neighbors just gave up trying.</p>	<p>See response to comment 87-26 above.</p>
03.5	87	29	<p>An "open house" was held on November 14, 2007. There were signs at that meeting prepared by the Spokane County Engineering Department that were not published in the Revised EA and were unavailable on line. A few days ago I was allowed to photograph these signs. (Please see attached copies.)</p>	<p>Thank you for your comments. The comment period was extended to 64 days to allow additional review time and submittal of comments.</p>

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03.5	87	30	<p>One of those signs ask, "What is the Purpose of the Open House?" It answers, "Opportunity for the Public to Review the Proposed Project" and "Opportunity to Discuss the Revised EA with County Public Works and the Consultant" and "Opportunity to Provide Comments on the Revised EA."</p> <p>This meeting was 3 hours long. There was no way anyone could have read and understand the Revised EA in the 6 days between when it was first made available and the night of the Open House. Three hours is a preposterously small amount of time to the public discussion of such a massive project.</p>	Please see response to comment 86-4 regarding public hearing procedure.
05.2	87	31	<p>The citizens of Orchard Prairie were promised a "Town Hall Meeting" on November 26. Instead, there were no signs and maps at this meeting. Questions were not publicly asked and answered, but rather an official and a court reporter were at one end of a big room taking verbal comment. It was very disappointing.</p>	Please see response to comment 86-1 regarding the cost of the project.
05.0	87	32	<p>At neither of the meetings, and nowhere in the Revised EA, can I find a realistic estimate of the cost of this project. Different people have guessed anywhere from \$23 million to \$100 million. The original EA says \$23 million. Does that still stand?</p> <p>What is that actual estimated cost?</p> <p>What money is being budgeted for sound and visual mitigation?</p> <p>This flawed process has not served the public interest.</p>	Please see response to comment letter 96 and comments in letter 100 regarding the North/South Corridor. Also see the response to comment 87-2 above.

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			4. If built as planned in the next few years, the Bigelow Gulch Alternative Freeway will preempt the need to complete the long discussed and highly studied North Spokane Corridor.	
05.5	87	33	An honest discussion of this project would include a map like this that shows how things are actually evolving. You owe our community the honest discussion that only a full EIS can offer.	Thank you for your comments.
45.1	87	34	The Community of Orchard Prairie is almost 130 years old. We boast the oldest continuously operating school district in the State of Washington. This project threatens to cut our community in two and thereby destroy it.	Comments noted. See responses to comments 17-2 and 17-3 above.
05.5	87	35	The only chance there is to save our community will be if a full EIS is ordered. We deserve it. If this monstrous thing gets built, we will also deserve appropriate and complete mitigation.	Comments noted. See responses to comments 17-2, 17-3 and 87-7 above.
03.5	87	36	Please include all previously submitted materials, documents, and comments from the 2006 process in this process.	Please see response to comments 87-20 through 87-23 above.
55.0	88	1	The data related to traffic volumes and accidents used to justify conclusions in the EA and many of the supporting documents are inaccurate, incomplete, applied improperly, and address issues in a skewed manner in order to justify this project.	This comment will be addressed per each topic mentioned below.
55.2	88	2	The Accident Data includes information from a period beginning fourteen years ago. There have been several significant upgrades during that period and the analysis should follow WSDOT guidelines, which call for a recent three-year period for analysis of collision data.	The data included in the Revised EA are from the beginning of the EA process, and some data were added/updated during preparation of the Revised EA. The collision data was updated with the number of collisions summarized for all years from 1994 to 2006. Accident data extending back to 1994 is included because that is the time frame when the need for this connector facility was first considered. The inclusion of

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55.1	88	3	The EA also neglects to accurately analyze the origins and destinations of traffic using this corridor.	<p>that data is not in order to sway a decision, but to demonstrate thorough use of available information.</p> <p>The purpose of an EA is to evaluate the potential environmental impacts of an improvement in order to determine if those impacts reach the threshold of being significant. The purpose of planning documents is to assess the need for transportation facilities and examine such things as origin, destination and volume of traffic.</p> <p>The origins and destinations for projected traffic volumes are part of the regional transportation model developed by the Spokane Regional Transportation Council (SRTC); SRTC commissioned the "Spokane and Kootenai County Regional Travel Survey" (2005) to determine the Origins and destination used in the regional model. Origins and destinations were also discussed in the "Connecting our community – A regional study of Urban Connectors", The connector study states for Trips served/Travel pattern; Primary south-to-east and vice versa, Serves primary industrial and freight movements between North Spokane County/Canada and the Interstate 90 system, provides more direct connection between the population and employment growth center in the East Valley and North Spokane.</p>
55.2	88	4	On page two of the Executive Summary it is asserted that "The Bigelow Gulch Road/Forker Road is (sic) a history of high collision rates, substandard roadway conditions and a declining vehicle capacity." The collision rate has dropped in the past few years and with the addition of six foot shoulders and other measures to improve its current and historic substandard conditions the safety could be substantially improved, without destroying this scenic Rural Minor Arterial and creating a restricted access Four or Five Lane Highway.	<p>With the exception of 1994 and 1995, collisions have ranged from 31 to 47 per year with no clear indication of overall decline. For example, in 2000 there were 31 collisions, but the next 4 years collision totals were in the 40's. Also, footnote 2 in Table 4.9-4 indicate collision data through October 2006, a review of November and December 2006 collisions indicate a total of 45 collisions for 2006.</p>

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55.1	88	5	The Executive Summary also states it (has) "a declining vehicle capacity," which is not explained or supported in the Revised EA and is most likely untrue.	Thank you for your comment. This statement was erroneous and has been revised and presented in Attachment A of the FONSI to read: "The Bigelow Gulch Road/Forker Road has a history of high collision rates, substandard roadway conditions, and increasing vehicle demand."
55.1	88	6	In Chapter 2: Project Description and Chapter 3: Alternatives in the EA, the report "Connecting our Community – A Regional Study of Urban Connectors (1998) (page 29)" was referred to as part of the justification for this proposal. This document states, referring to the Bigelow Gulch and Forker Roads that, "More than 16,000 travel these roads daily, making these once rural roads busy with urban commuter traffic." This same document also says that the traffic volume will be 25,000 to 30,000 per day in 2010 and 2020, after completion of the North Spokane Corridor Project.	The existing traffic volumes used in the analysis are the most current. The volumes stated in the Connector Study were the existing volumes at the time the study was completed. The traffic volumes shown in the 1998 document demonstrated the need for the project from a planning perspective. Further refinement of the factors considered, which is appropriate when moving from a planning function to an analysis and design function, does revise the volumes from the 1998 document to the current projections. The change demonstrates that there was due and fair consideration of the development within the area served by the facility and a refinement of what is known about the area as it is considered in the model. The lower numbers continue to demonstrate a clear need for the improvement.
55.1	88	7	The most recent traffic counts in 2007 indicate a total Average Daily Traffic (ADT) Volume of 12,580 East of Argonne on Bigelow Gulch and only 7,238 East of Argonne on Bigelow Gulch. The traffic projections in Section B of the Appendix of the 2006 EA which is included by reference in the 2007 Revised EA, project total volumes to be about 14,000 West of Argonne and about 12,500 East of Argonne. Both of these projected ADT Volumes for the year 2025 are significantly below the traffic volumes quoted as the EXISTING traffic volumes in the 1998 analysis.	The Kaiser labor strike was a possible cause of declined traffic volumes shown on Bigelow Gulch. Traffic Volumes from 1997 were not used in the analysis and were put in for historical informational purposes. The 2002 and 2003 traffic volumes on Bigelow Gulch east of I-90, which was not referred to in the Section B

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			<p>Appendix. This spike was treated as normal traffic and the drop to back to normal traffic patterns (a decrease of more than 3,000 vehicle per day) was attributed to the Kaiser Labor strike, in which case a majority of all Kaiser Employees would have been using this corridor which is not a rational or objective conclusion. This shows a skewed, biased and selective interpretation of data, which should [be] fully explained. The traffic analysis East of Argonne on Bigelow Gulch in Appendix B uses a spike in the data from 2002 and 2003 caused by the two year re-construction project of the Argonne Bridge over the Spokane River in Millwood and or the construction of the BNRR underpass an Argonne and Trent, as the beginning point for the Interim 2025 VISSM projections. The VISSM projection for 2007, is 7238. These studies and projections are flawed and should be done again making sure WSDOT Engineers fully acknowledge and justify their input data, assumptions and conclusions. This is another example of the need for a full Environmental Impact Statement and also an example of the need for additional time for the public and other independent agencies to review the EA for other significant errors or incorrect presentation and interpretation of data. (See Attachment)</p>	<p>Argonne were not used in the analysis, an ADT of approximately 7,500 Vehicles/Day was used in the analysis of existing level of service. The existing ADT of 7,500 VPD average daily traffic coincides well with an actual 24-hour count that was done on 10/31/2007.</p>
55.1	88	8	<p>The most recent ADT Volume on Bigelow Gulch East of Argonne is 12,850, which is 112 vehicles per day less than the ADT Volume of 12,962 of the 1994 count, which was at least 13 years ago. The most recent traffic data for Bigelow Gulch East of Argonne shows an ADT Volume of 7,238, which, is 1,269 less than the ADT Volume of 1994. Since there has been a reduction in traffic from 13 years ago, this raises the question of the validity of the data used to justify the assumption of huge traffic growth projections which were used to justify application for funds to convert the rural road into a five lane restricted access highway, the construction of which would greatly impact the community. Once</p>	<p>Sometimes it is appropriate to look at historical trends in traffic, but for long range projections it is more appropriate to analyze traffic that results from projected land use during the planning period, which is what was done for this project. The forecast traffic volumes used in the analysis were developed by the SRTC with collaborative review by WSDOT, City of Spokane, City of Spokane Valley and Spokane County and reflect traffic expected to result from the planned future land use in the region.</p>

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55.1	88	9	<p>again such a huge undertaking as building a divided four-lane highway that has significant community disruption and concern should have a full EIS.</p> <p>The traffic volume figures in the previous paragraphs and referred to as ADT Volumes are actually figures taken from Spokane County Traffic counts on a Tuesday, Wednesday or Thursday, which were chosen because of their normally higher volumes to monitor peak volumes for days and peak hours. (See attached Traffic Study Reports for Bigelow Gulch and Argonne East and Bigelow Gulch and Argonne West).</p>	<p>It is standard practice to use Tuesday through Thursday counts, weekend traffic does not represent normal traffic, and there is higher variations in volumes on Mondays (typically lower) and Fridays (typically higher).</p>
55.1	88	10	<p>Table 9.4-1 in the Revised EA Historical Annual Average Daily Traffic indicates that the AADT has declined between 1994 and 2005 from 12,326 to 11,806 between Havana and Argonne Road and has declined from 8,499 to 6,901 also from the same 1994 to 2005 period.</p> <p>The AADT (Average Annual Daily Traffic) Volume is referred to in some instances in Section 4.9 of the Revised EA. These AADT figures should be lower than the ADT figures because this average should include weekends and lower seasonal traffic periods. No explanation of how these AADT figures were extrapolated from the existing data was included.</p>	<p>The data presented in Table 9.4-1 are based on 24-hour traffic counts taken on typical weekdays – it is more accurately described as Average Daily Traffic (ADT), based upon the American Association of State Highway and Transportation Officials (AASHTO) definition of counts that are taken over more than one day, but not over every day of a year. Correction to the more accurate term of ADT has been made. As the commenter noted, ADT is typically more conservative than AADT because the averages do not include lower weekend volumes. Please note, the traffic volumes in Table 9.4-1 are presented to show general historic trends. Analysis and design completed for this project are based on peak volumes projected for typical weekdays.</p>
55.2	88	11	<p>The traffic accident data goes back to 1994. According to WSDOT guidelines collision data should include the three most current years. There have been significant changes to the roadway since 1994 and accident data for a three-year period ending sometime in the calendar year of 2007 should have been available to present an accurate picture of the current collision data. In 1994 and 1995 there were 59 and 64 collisions respectively. This is 12 (26%) and 17 (36%) more collisions than the</p>	<p>The collision data included back to 1994 and 1995 are included as are all years from 1994 to 2006 for an historical perspective of the collisions on the corridor. These data are included because the evaluation for this facility began in the mid 1990s. The EA was first published with a 10-year history to provide a better picture of traffic safety. It should be noted, that the three most current years of data is to set a minimum amount of time for consideration, and should not be considered</p>

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55.2	88	12	<p>next highest year of 47 collisions. Also there were fatal accidents in both 1994 and 1995. Are the higher collision rates and fatal accidents of 1994 and 1995 a factor in choosing to extend the data collection period back more than thirteen years?</p> <p>Also it would have been instructive and very valuable to judging ways to improve safety if other types of collision information could have been presented such as contributing factors such as: Ice, snow, other weather factors, drunk driving or extreme excessive speeds.</p>	<p>restrictive if more data is available.</p> <p>The connector project will improve the roadway to straighten curves, provide recovery of run-off road vehicles, add shoulders, open the roadway to allow sunshine to reach road surface, all which may reduce weather related collisions. Traffic safety and law enforcement officials will emphasize reducing collisions due to drunk drivers and excessive speed, and will be implemented throughout the State of Washington through education/media and law enforcement efforts.</p>
55.0	88	13	<p>In Section 4.9 of the Revised EA it is stated that Bigelow Gulch is a 6.5 mile Rural Minor Arterial with 1 to 3 foot paved shoulders and a posted speed limit of 45 mph. Actually traveling from west to east, beginning a few hundred feet east of Havana, there is a speed posted of 35 mph, which increases to 40 mph and does not increase to 45 mph until about two miles later. It remains at 45 mph for about one mile then is posted at 35 mph for the Fire Station before Jensen Road and continues for about one mile through the Argonne intersection to Old Argonne Road. There it increases again to 45 mph again for about two and a half miles until it approaches Forker Road where the speed limit is 35 mph until it reaches Progress. This is truly a Rural Minor Arterial with only about half of its length posted with a speed limit of 45 mph.</p>	<p>Bigelow Gulch is posted 45 mph from Havana to Jensen (2.89 mi.), 35 from Jensen to just east of Argonne (0.59 mi.), posted 45 to Forker (3.15 mi.) then posted 35 on Forker/Progress (1.69 mi.). Totals 45 = 6.04 mi., 35 = 2.28. Therefore two-thirds are posted 45 mph.</p>
55.1	88	14	<p>The Highway Capacity Manual (HCM) discusses quality of service of which level of service (LOS) is one measure. There is also the related Measure of Effectiveness. The HCM uses different measures to calculate LOS for different road types and posted</p>	<p>The HCM LOS criteria use average travel speed and percent time-spent following as performance measures. Both of these criteria were used in the Bigelow Gulch analysis. The existing segments of the Connector posted 35 were not analyzed. See Attachment B-1 in</p>

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			<p>speeds. It is not clear that proper form of analysis has been applied to the current roadway system. It appears that the methodology being used is that for a rural highway with a speed of 50 to 60 mph rather than that for a Rural Minor Arterial with a speed of 35 to 45 mph.</p>	<p>Appendix B of the 2006 EA. The HCM methodology is for roadways with speeds of 45 to 65, and no separate analysis is prepared for lower speeds. The speed limit for the corridor is 45 mph. Therefore the correct methodology was used in the Connector analysis.</p>
55.0	88	15	<p>One proposal that has not been analyzed in improving Bigelow Gulch by adding six-foot shoulders and providing center turn lanes and possible passing/climbing lanes where appropriate, with a speed limit of 35 or 40 mph. This could be accomplished largely within the current right of way, provide adequate safety improvements, allow for adequate law enforcement efforts and retain the rural character of the road and community. It is noted that portions of Upriver Drive currently have ADT volumes in excess of 1,500 per day. This possibility should be fully considered in an EIS assuming the completion of the North Spokane Corridor Project.</p>	<p>A three-lane roadway would not provide a Level of Service that meets accepted County standards. A three-lane section is more appropriate for use on urban roadways with speed limits at or below 35 mph. A 35 mph speed limit over the entire corridor would not meet driver expectations. This would result in a significant percentage of drivers exceeding the posted speed limit. While a significant percentage of drivers would exceed the posted speed, some drivers would obey the posted speed. This situation would result in a high potential for accidents when faster drivers seek to pass slower drivers. In a worst case scenario, the center turn lane could have serious head-on collision accidents. While it seems that a lower posted speed should be safer, this is not necessarily the case. An un-warranted reduction in posted speed is not proven to be safer, which is a common misconception. Reducing speed limits will not directly decrease the number of crashes and increase safety (ITE). Upriver Drive is an Urban arterial and therefore has different functionality and characteristics than the Bigelow Gulch Connector.</p>
55.1	88	16	<p>Reviewing the only traffic speed data available for Bigelow Gulch available from information collected in 2005 it is noted that at two locations (the first at Bigelow east of Havana and the second at Bigelow at Lehman) that traffic in both directions have an average speed that exceeds the posted speed of 45 mph at all hours of the day including peak traffic hours. These traffic studies show that about 60% of all traffic is traveling above the posted limit even in peak hours and that less than 10% is traveling 40 mph or less. Common sense says that</p>	<p>See Section 2.2 of the EA, Purpose and Need. The purpose and need of the project outlines the multiple reasons the project is warranted, not just congestion and delay. There is not an existing element of "extreme congestion or delay" on the corridor at present, and the EA does not make that assertion. There is a situation of congestion that will develop over the design period of the facility if left as is. There are also a significant number of trips that would use the corridor, and benefit from travel distance and time savings, if it is improved that at</p>

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			there is not extreme congestion or delay in the traffic stream and that it is questionable to spend \$60 to \$100 million to fix a problem that may not exist or perhaps exists only peripherally during only one or two hours per week. (See March 2005 Traffic Studies attached.)	present use other less efficient routes.												
55.1	88	17	Section 4.9.2 of the Revised EA under Freight Movement says that Bigelow Gulch carries between 4 and 10 million tons of freight annually based on year 2000 and 2004 vehicle counts. The county offered only one study that segregated traffic by vehicle type, which, was conducted in 2005. What was the method and studies used to determine the actual freight on roadway? If a person is between 4 and 10 feet tall do you build a house with 10-foot doorways or would it not be more prudent to get better information before proceeding? This lack of anything approaching precise data about current freight volumes being available while the proponents are asserting the need to develop a new restricted access Bigelow Gulch Highway in great party for freight mobility is distressing and should not be tolerated by the FHWA nor the WSDOT and is further evidence of the need for a full Environmental Impact System.	The total truck tonnage estimation done by Spokane County for their Freight and Goods Transportation System (FGTS) are done in the following manner. A multiple day vehicle classification study is conducted with a tube counter that classifies vehicles according to the Federal Highway Administrations (FHWA) scheme F (an algorithm created by Maine DOT in the mid 1980's). Total vehicle volume and the breakdown of trucks are then entered into an Excel spreadsheet, created by the County Road Administration Board (CRAB) that used truck weights created by the Washington State Department of Transportation (WSDOT) Transportation Data Office (TDO) based on previous studies. These total tonnage figures are then converted to an annual gross tonnage figure to determine the overall classification of the road. The FGTS truck routes are divided up into classifications as follows:												
				<table border="1"> <thead> <tr> <th>Classification</th> <th>Description - Gross Tons (GT)</th> </tr> </thead> <tbody> <tr> <td>T - 1</td> <td>Over 10 million GT/Yr</td> </tr> <tr> <td>T - 2</td> <td>4 to 10 million GT/Yr</td> </tr> <tr> <td>T - 3</td> <td>300,000 to 4 million GT/Yr</td> </tr> <tr> <td>T - 4</td> <td>100,000 to 300,000 GT/Yr</td> </tr> <tr> <td>T - 5</td> <td>Seasonal - &gt;20,000 GT/2 mo</td> </tr> </tbody> </table>	Classification	Description - Gross Tons (GT)	T - 1	Over 10 million GT/Yr	T - 2	4 to 10 million GT/Yr	T - 3	300,000 to 4 million GT/Yr	T - 4	100,000 to 300,000 GT/Yr	T - 5	Seasonal - >20,000 GT/2 mo
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55.1	88	18	Table 4.9-3 Corridor Travel Time Comparison compares the time and distance between the two terminals of the route with other more circuitous routes. Therefore the analysis is already determined and frivolous. It is not	The Corridor travel time comparison Table 4.9-3 list the existing comparison and is explain in the Freight movement paragraph which is in section 4.9.2, "What are the existing transportation conditions along the												

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			<p>even stated whether this analysis is for the existing configuration or is analyzing the new Bigelow Gulch Highway. It also should analyze any time and distance studies with the North Spokane Corridor complete. A more useful and appropriate analysis would be to compare the initiating points and final destination points for the current users of the route. For example the beginning point should not be Freya and Francis since probably at least 90% of the traffic passing Freya and Francis also pass through Market and Francis or beyond. At the other end of the route likely only a small percentage of the traffic terminates at Sullivan Road and SR290, with the vast majority passing through to Sullivan and I-90 and beyond. At any rate, a proper study including the completed North Spokane Corridor and also including a thorough analysis of origins and destinations of traffic using the road should be completed and included in an EIS to accurately assess the users and their needs.</p>	<p>existing alignment.” This is a comparison for Freight, connecting two industrial and wholesale distribution facilities at each end of the corridor, with the starting point and ending points being a common point for comparing the travel times and the destination beyond the start/end point would be equal. This is an existing comparison; a study of the NSC would not be appropriate due to it not being completed.</p>
55.1	88	19	<p>At the very least the priority of this project should be fully reevaluated in conjunction with accurate traffic studies and projections. And the question of State and Federal Funds being dedicated to this project rather than the North Spokane Corridor should be viewed more strategically. If these studies use elevated volumes in anticipation of the North Spokane Corridor ending at Francis, that assumption should be evaluated for its accuracy and its propriety. A real analysis of whether the Bigelow Gulch Highway will carry naturally increasing traffic, or will draw more traffic because of its existence has not been adequately addressed.</p>	<p>Responses to previous comments in letter 88 address the adequacy of the data used in the analysis. The funds used for the Connector and the NSC are different pools of money. Elevated traffic volumes were not used in the analysis. The issue of increasing traffic was analyzed by the approved regional forecast transportation model. The Connector project will serve to provide a local connector to allow efficient movement from one urban center to other centers. These are not interstate trips, they are inter-urban trips. This facility will fulfill that purpose and not result in trips artificially being forced to use the Interstate network due to the lack of other options. When local trips clog the Interstate network, the local and the national economy is impacted.</p>
03.5	88	20	<p>Reading the Revised Environmental Assessment for Bigelow Gulch Road/Forker Road Urban Connector is difficult. It is a pompous, self-aggrandizing document,</p>	<p>Comments noted. The construction of the Argonne intersection was completed in 2005 as a safety project to correct deficiencies at the intersection. The</p>

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			<p>structured to accent its own correctness. It attempts to neutralize adverse comment as being irrelevant by quoting and referencing itself without any resolution. This irrational approach is in keeping with the way the public has been treated in this process from the very beginning. Public comment has been, at best stage-managed, and at worst treated with open hostility and attempted suppression. Many, many citizens whose lives will be deeply affected by this project have been treated as an inconvenience. Information has been routinely withheld. Landowners are told, "we'll work with you," and expected to simply believe. A central portion of the roadway, the intersection of Argonne and Bigelow Gulch was undertaken without a single opportunity for public comment. Presented as an intersection improvement, the five lane under the radar subversion was obviously done to make the highway a fait au complit.</p>	<p>environmental review for that project through the Spokane County SEPA process.</p>
45.0	88	21	<p>The EA references the goal of preservation of communities and neighborhoods, (section 2.5) yet this project, which is outside of the Spokane County Urban Growth Boundary, will divide the historic Community of Orchard Prairie. And since the Department of Engineering and Roads has nothing to do with county planning, it is a vacant promise that the 'improved highway' will not promote growth along its route. If roadways did not promote growth, then the westward expansion would never have happened. This project is out of keeping with the Growth Management Act because it builds a highway without regard for current and future impacts. Every comment documented in the appendices concerning community preservation and concern for urban sprawl is dismissed by a recitation of the applicable National Environmental Policy, Washington DOT code or County Code, as if these somehow grant protection by their existence. This is no plan of implementation of these protections or</p>	<p>Comments noted. The issue of consistency with Growth Management and the Urban Growth Boundary was been addressed in sections 4.7 (Land Use and Displacement), 4.16 (Social and Economic Elements) and 4.17 (Cumulative Impacts).</p>

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45.1	88	22	<p>guarantee by the agencies that they will be brought to bear.</p> <p>A child will no longer be legally able to walk to school on Bigelow Gulch Road. How will that be mitigated?</p>	<p>Pedestrians will be able to use the shoulders of the new facility whereas the current facility has standard shoulder width for use by pedestrians. The new facility will provide wide shoulders, improved sight lines and a much safer setting.</p>
55.2	88	23	<p>At its inception, the plans to improve Bigelow Gulch Road were based on concerns for safety. Over the many years as discussions continued and grandiose plans emerged, the roadway was neglected. Many preventable accidents causing injury and death have occurred due to the negligence of Spokane County. Because the shoulders of the roadway are narrow and eroded, law enforcement found it impossible to patrol. Even though citizens who live along the road asked for improvement of the shoulders, and a lower speed limit to mitigate for deficiencies in the engineering and condition of Bigelow Gulch Road, none of the suggestions were ever tried. Motorists continued to be injured and die.</p>	<p>The suggestions offered in the comment were considered in the development of this project. They were considered and found to not sufficiently improve the corridor to meet the purpose and need for the project nor the level of service required based upon the planning process that led to the recognition of need for the project.</p>
45.0	88	24	<p>Now The County has manipulated this tragic situation into a plan for a highway that will alter the Community of Orchard Prairie and the character of Spokane County forever.</p>	<p>Comments noted. Please see response to comment 88-</p>
55.1	88	25	<p>The Environmental Assessment references the movement of traffic coming from the North Spokane Corridor (NSC) as a "Project Benefit." When this new roadway does that, it will weaken and for some time kill the need for the completion of the Corridor. This is an inappropriate use of public funds, in that it diverts the intent of planning by providing this supposed temporary redirecting of traffic. If and when the NSC is completed, will Bigelow Gulch Highway be rolled up? It also defies the WSDOT plan to use Parksmith/Stoneman to diffuse</p>	<p>See response to comment 14-1 regarding Stoneman. Also please refer to responses to comment letter 96 regarding the North/South Corridor and comments 87-2 and 87-4 above.</p>

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05.2	88	26	<p>The funding for this roadway is a complicated manipulation. It uses the need for freight mobility to secure funds to build. That is the very thing for which the NSC is being built. What an intricate circular argument this plan is: The EA's traffic studies are provably inaccurate; it projects traffic volumes which are wildly overblown, and makes no allowance for the relief of volume that the NSC would bring. Instead, it assumes that the NSC will bring more traffic. It is clear that sending trucks through this route defies and negates planning for a necessary highway (The North Spokane Corridor). It is obvious that building Bigelow Gulch to the higher standard than is necessary is circular logic and textbook "wag the dog" exploitation.</p>	<p>Please see response to comment 88-1 through 88-19 regarding traffic data and truck traffic, and responses to comment letter 96 regarding the North Spokane Corridor. Funding of transportation projects is becoming more complex, there is a need for inter-urban freight corridors just as there is for interstate corridors. As stated in previous responses, the need for this corridor will remain after completion of the NSC. It provides a different purpose for a different type of trip, interurban versus interstate. The traffic projections indicate that the Connector is clearly needed in addition to the NSC to provide for future regional demand.</p>
65.0	88	27	<p>The EA recognizes and then dismisses the need for noise mitigation. Again alleging that "we'll work with you" should be good enough to mollify effected landowners. Many residences such as the house at 7611 E. Bigelow Gulch Road (the oldest remaining homestead) will have noise levels exceeding WSDOT standards, with no prescribed mitigation. That the value of such a property will not be affected is naive. Yet the only prescribed remedy is "we'll work with you." It is probable that Spokane County may have to justify "we'll work with you" in court appearances.</p>	<p>Comments noted. The allowance for noise mitigation following WSDOT protocol has been explained in Appendix 6 (Revised Noise Discipline Report) as well as in section 4.11 (Noise) of the Revised EA. Spokane County has committed to addressing noise on a parcel-by-parcel basis as part of project design.</p>
05.4	88	28	<p>A truly enlightened government tries to plan for the future. This county clearly does not see global warming or climate change as an issue for concern. If it did, there would be planning for trip reduction mitigations. Nor does it recognize and address the reality of fossil fuel price and availability. This county should be more concerned with quality of life issues such as open</p>	<p>Comments noted. The proposed project is to address an existing need for an improved roadway as well as future anticipated needs based on the tools currently available to predict those needs. Future transportation programs will most certainly include an integrated plan to address climate change and reduced fossil fuels. The direction of these programs in Spokane County will require a series</p>

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			spaces and carbon neutral planning. A truly future-wise government would be proactive in preserving valuable farmland in anticipation of bio fuels development and new trends in local food production. Instead, this county encourages traffic volumes to grow, concentrates it in inappropriate area, and promotes urban sprawl and the loss of farmland. An enlightened government protects its citizens. Instead this county forces this shortsighted, tunnel vision project onto citizens in spite of the impending harm of pollution, community destruction and urban sprawl.	of incremental steps by the county, state, and federal governments. As proposed, this project will reduce travel distance, travel time, and delay time; which should contribute to consuming less fuel and producing fewer greenhouse gases.
03.5	89	1	The purpose of this letter is to directly request that you take measures to extend the Public Comment period for the Environmental Assessment (EA) for the proposed Bigelow Gulch Road project to allow adequate and reasonable time for review and informed response by the Public to these documents in conformity to the requirements, goals and philosophy of the Washington State Department of Transportation (WSDOT) and Federal Highways Administration (FHA).	An extension of the comment period from 30 days to 64 days was granted by the Spokane County Commissioners.
05.2	89	2	I understand that the size and cost of this project will make it the largest Road project in terms of financial expenditure ever undertaken by the County. The most recent Estimate of about \$55 million using 2006 construction cost parameters, will probably exceed expenditures for the Appleway-Sprague couplet project.	See response to comment 86-1 regarding project cost.
05.5	89	3	At first glance it seems an Environmental Impact Statement would have been a prudent approach to addressing environmental and other issues rather than attempting to address them through an Environmental Assessment.	Please see section 1.4 of the Revised EA regarding NEPA EA and EIS.
03.5	89	4	We, the public have been given only thirty days to respond to the new documents in the Revised Environmental Assessment, which comprise two tomes of about 400 to 500 pages each. The original	Please refer to response to comment 89-1

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03.5	89	5	<p>Assessment of 2006 and Appendices comprising an additional 800 to 1000 pages are also included by references. The WSDOT Guidelines recommend that an Environmental Assessment be a Maximum of only 15 pages. (See excerpt from WSDOT Procedures Manual – Environmental Assessment Outline which is attached and highlighted). These documents, which are 50 to 100 times greater than the 30 days currently allowed for an adequate review and considered responses. (Note three of those days were County holidays and ten were Saturdays and Sundays)</p>	<p>Comment noted. Please see response to comment 87-26 regarding the review period.</p>
			<p>When I asked the staff at the Open House, why there was not a longer comment period I was told that they believed that the WSDOT had mandated a limit of 30 days. I asked the same question of Mr. Ives of Stokes and Jones and he thought that the comment period was determined at the local level. I have requested confirmation of the rational or any communications to the Public Works Department by the WSDOT or others for the justification and documentation relating to or supporting the abbreviated comment period, but have received none.</p> <p>The requirements for public comment periods according to the WSDOT Procedures Manual for an Environmental Assessment with a Section 4(f) evaluation, which this one does have, requires a Minimum of 45 days for public review and comment. (See WSDOT Environmental Procedures Manual page 411-11 (b) Public Review and Comment attached and highlighted). Some people might think this is an effort to limit public response and input to the process but I think and hope it was an oversight by people in the Public Works Department wishing to complete the process as quickly and with as little difficulty as possible.</p>	

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03.5	89	6	I have requested information referenced in the EA from County Staff and the Consultants but there have been delays due to the Holidays, Staff family illnesses, consultants from Stokes and Jones & Stokes on other assignments and my own busy schedule. There just has not enough time for the supporting data requested to be provided and reviewed.	Comments noted. Please see response to comment 1-3.
03.5	89	7	In the Public hearing I requested an extension for the comment period. I also heard many others who requested an extended comment period noting the lack or adequate time for response considering such great amount of new information during the busy Holiday season. I would again suggest that the comment period be formally reopened and allowed to continue until at least February 15 to allow adequate review and response by the public to the great amount of new information in these very large documents.  At a minimum a full new 45-day public comment period should be announced to make the process be in conformity to the requirements for the State, WSDOT, and FHWA.	Please refer to response to comment 89-1
55.1	90	1	There was a time when I was opposed to a 4-lane road, but over the last couple of years I have changed my mind. I live and farm land along Bigelow Gulch and move farm machinery on Bigelow Gulch, from Forker Road to the east to Mount St. Michael to the West. Most of time when I move machinery on Bigelow Gulch Traffic backs up for 1/2 mile or more. As the road is now there is nowhere along the road that I can get over and few places for cars to pass. A four lane road would allow traffic to pass from behind keeping traffic moving.	Thank you for your comments.
55.2	90	2	Also the road needs to be four lanes for the safety of the public who travel the road, a two lane road is and would not be adequate. The intersection of Forker and Bigelow Gulch is dangerous with numerous accidents there	Thank you for your comments.

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01.3	90	3	<p>In closing after having traveled on and moved machinery on the new portion of Bigelow Gulch at Argonne Road. I am very much in favor of the new Urban Connector as proposed.</p>	Thank you for your comments.
55.2	91	1	Bigelow Gulch needs to be changed. The number of accidents and the potential of a fatal crash on the existing road is a real problem. Not taking charge and correcting this problem is irresponsible.	Thank you for your comments.
55.1	92	1	When traversing to points East or returning, Bigelow Gulch is often, even in its current condition the fastest (therefore most efficient) route. While not necessarily designed for heavy commercial traffic, much of the traffic currently is commercial. With the upgrade we believe this will have a positive impact on the business community by making this route safer and giving it more capacity.	Comments noted.
55.0	92	2	Market Street currently has more North – South tractor/trailer traffic than any other sector of Spokane primarily because of the huge distribution centers located in East Hillyard. These distribution centers include food, petroleum, and manufactured goods. Market Street is a good example of what can happen with heavy truck traffic on arterials. Over the last seven years much of Market/Green/Freya corridor has been rebuilt. Much of it is slated for improvement in the not too distant future. The sections yet to be done are in poor condition especially this winter season.	Comments noted.
01.3	92	3	As a businesses association we are very excited with the prospects of the improved infrastructure. Good infrastructure equals expedited competitive business. We also realize we are only one of the communities that	Thank you for your comments. Spokane County will coordinate with the Greater Hillyard Business Association as requested.

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			will be impacted by this project. We would like to be included in the future discussions regarding this important project and look forward to its successful completion.	
65.0	93	1	"No" Jake Brakes "Noise"	Thank you for your comments. The issue of Jake brakes was addressed in Appendix 3, Table 3-3, pages 163 and 164 of the Revised EA.
55.0	93	2	Speed limit	Please see response to comment 1-7 regarding speed limit.
60.0	93	3	Air pollution	Please see response to comment 70-3 regarding air quality.
65.0	93	4	"Need Noise Berm"	Thank you for your comments. Please see Attachment D of the FONSI regarding mitigation measures for noise. Spokane County will work with property owners regarding screening.
45.0	93	5	We would like to talk to someone about the sale of our land.	Comment noted. Please contact Bill Hemmings Spokane County Public Works regarding sale of property.
03.5	94	1	The Morgan Acres Neighborhood would like to be added as a party of record concerning the Bigelow Gulch Project. This project ends just inside our neighborhood boundary. As per our subarea plan we would like to be involved with this road project and any other county project that impacts or takes place inside our boundary.	Thank you for your comments. Spokane County will coordinate with the Greater Morgan Acres Neighborhood Association as requested.
85.0	95	1	I have reason to believe that the Public Notice process for the EA and Section 4(f) Evaluation was flawed and does not conform to all the applicable statutes. Therefore I request that a copy of a notarized statement of other certification be provided that states that the notification for the document availability and comment period for the EA and Section 4(f) Evaluation were published in accordance with all applicable State and	The notarized statements announcing the notice of availability of the Revised EA have been posted on the Spokane County website at: <a href="http://www.spokanecounty.org/engineer/bigelowgulchforconnector.asp">http://www.spokanecounty.org/engineer/bigelowgulchforconnector.asp</a> Public involvement for a NEPA EA is optional, as is the requirement for a public hearing. The Revised EA

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			<p>Federal Laws and Regulations.</p> <p>Federal and State Environmental Regulations and guidelines encourage and require Lead Agencies to make diligent efforts to involve the public in NEPA processes. The WSDOT Environmental Procedures Manual strongly recommends a public involvement plan and provides a Sample plan in Exhibit 410-1 of the Environmental Procedures Manual. The Local Lead Agency did not make any such plan and WSDOT and the FHWA should have been responsible to assist and require the local agency to form such a plan for such a large project that may still require an Environmental Impact Statement. As a result the public has been provided late access to huge documents with new information to read, assimilate and try to give meaningful comments on in an unreasonably short time. This is contrary to the Public Involvement requirements of NEPA.</p>	<p>included an open house and public hearing as well as large distribution of the revised EA in paper copy or CD for public review. Spokane County exceeded the minimum requirements for public involvement and conducted the process consistent with FHWA guidance and 23 CFR 711.111.</p> <p>Please note, that the WSDOT Environmental Procedures Manual is a statement of how WSDOT chooses to conduct business. That manual does not obligate local agencies to conduct their business in the same manner. Local agencies are required to comply with 23 CFR Part 771 relating to environmental impacts.</p>
03.5	95	2	<p>There should be a clear and easily understood presentation to all property who may be required to give up property for Right of Way, including amount expected to be taken, notification of individual legal rights including information procedures for reimbursed appraisal and legal expenses. There has been very little attention paid to these issues, which certainly would have been emphasized with an early public involvement process. There has been significant Right of Way acquisition for this project already. I understood that for FHWA reimbursement that the Environmental documents had to have been approved completely before acquisition began. I am concerned that not all the acquisitions satisfy the Federal Right of Way acquisition procedures and policies.</p>	<p>Comment noted. Spokane County will provide that information to property owners in the right-of-way during the early stages of project design. Acquisitions to be reimbursed by FHWA must not proceed prior to approvals however Spokane County can make non-reimbursable acquisitions prior to the NEPA process but must follow the procedures of the Uniform Relocation Assistance and Real Property Acquisition Policies Act.</p>
05.2	95	3	<p>I have asked for the listing of the Right-of-Way already obtained but it was not available immediately so I may make further comments when it becomes available.</p>	<p>Request noted. Spokane County will provide the requesting party with a listing of the right-of-way</p>

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			<p>Concerns still exist about the costs of such a large highway project. The EA of 2006 indicates a project cost of \$23 million and the Revised EA is silent on the Cost issue, so is the \$23 million figure still in use since it has not been changed in the Revised EA? I recognize that at points in the appendix, in response to questions asked in 2006 in figures of \$40 million and \$53 million are referenced, but this is not the proper place or format to present this data. In consulting with the Public Works Office an estimate of about \$55 million is proposed using 2006 cost parameters. In this budget here is no budget for any mitigation expenses. For an effective analysis of a project and its alternatives certainly a complete and current cost estimate should be included in the Environmental Assessment and a reasonable and appropriate figure should be included for each element of mitigation if there is really an intent to properly mitigate the negative impacts of this project. It should be noted that in the 3a project the Argonne Road Bigelow Gulch intersection that the Estimate was \$2.5 million and the actual cost to date is about \$4.175 million for a 67% expense above original budget. If similar budget increases occur for the remainder of the project which they very likely will, especially if mitigation costs included and material and other cost figures are updated to current year parameters this project will likely exceed \$100 or \$120 million. Accurate budget estimates should be included and evaluated in the EA and analysis of the project and alternatives.</p>	<p>acquisitions. Please see response to comment 86-1 regarding project cost.</p>
05.5	95	4	<p>I wish to include by reference my letter presented in comment to the 2006 EA concerning the 3A portion of the project as well as the SEPA document to which it refers, and will provide a hard copy for an attachment at a later time. I feel my comments and the issues raised were not properly addressed. I want to again stress the point that this is an example of a minimalist approach to</p>	<p>Comment noted. Please see response to comment 88-20 regarding the Argonne Intersection project. That project was completed under the Spokane County SEPA process.</p>

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65.0	95	5	<p>I would also like to include my letter regarding noise analysis from the 2006 EA by reference. The new EA makes no firm commitment to address any noise issues. This is unacceptable since it will greatly degrade the environment and have large impacts of the use and value of significant portions of property in the area. There may be additional areas that cannot be developed because of building code noise limits by or practically because of noise issues. The financial and nuisance mitigation commitment is nonexistent in this document and should be fairly addressed.</p>	<p>Please see response to comment 88-27 regarding noise mitigation.</p>
05.0	95	6	<p>There is no coherent policy or philosophy for aesthetic and vegetation mitigation measures. A policy and corridor wide plan should be developed with the final corridor wide plan and philosophy coming largely from the directly affected residents. Once again this is an example of poor planning and the lack of an early public involvement plan.</p>	<p>Please see mitigation commitments for Visual Quality presented in section 4.12 of the Revised EA.</p>
03.5	95	7	<p>I also note that only the 2007 EA and Appendix were available at the North Argonne Library. The 2006 EA and its Appendix should also have been available since it is included by reference and is an integral part of this document. Therefore the full EA and Section 4(f) Evaluations were now available to the public as required by NEPA regulations.</p>	<p>Comment noted. The 2006 EA was available at the Spokane County Public Works' office and on the website at: <a href="http://www.spokanecounty.org/engineer/bigelowgulchforakerconnector.asp">http://www.spokanecounty.org/engineer/bigelowgulchforakerconnector.asp</a></p>

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03.5	95	8	I have many other comments I would like to make regarding this document but have not had time to fully study these huge documents or obtain the many referenced documents and studies I would need to accurately make constructive comments or criticisms.	Thank You for your comments.
03.5	96	1	<p>Dear Senator Morton: For years, the Engineers of Spokane County have been talking about “improving” Bigelow Gulch Road. There has been a well document history of badly handled public meetings held by an engineering department that sees it’s job to be to facilitate maximum traffic flows and minimize the honest concerns of people in the path of their projects.</p> <p>In January of 2006 the citizens of Orchard Prairie were confronted with a proposal to expand Bigelow Gulch Road into five-lane highway. The project was to be built through the center of our community. A lot of testimony was offered challenging many specific aspects of their Environmental Assessment (EA) for the expansion. A compelling case was made at that time that a project so vast, and with so many environmental issues, should be studied with a full Environmental Impact Study (EIS).</p> <p>For the last year, we have made repeated and continued requests for updates on the project, but the first hard information we’ve gotten from the County came in mid November.</p> <p>Just in time for the Holidays, the project has suddenly returned. We’ve just received a new, significantly larger document than the original 2006 EA and have been given until January 11th to offer serious, thoughtful testimony.</p> <p>A preliminary scan of this vast new document reveals many areas of serious concern. This project, as it seems to be advancing, threatens the very existence of our community.</p> <p>We believe now more than ever that a full EIS is</p>	<p>Public meetings, and other opportunities for public input, have been conducted related to this project. Many changes have been made to the project due to that public involvement. Effective and reasonable communication has occurred between the County and the citizens of the County. The vast majority of interactions between project representatives seeking public input and citizens providing input have been civil, cordial and productive. The proposed project represents the implementation of that productive public involvement process.</p> <p>The comment implies that the project development process was not open to public involvement. That is not the case. Large transportation improvements go through phases, input is gathered, changes and development occurs based upon that input, and more input is sought upon those changes. Then the development cycle continues. That is the case with this improvement.</p> <p>Timing of seeking public input is always something that can cause difficulty, there are Holidays, school vacations, various sports seasons, etc. The requirement is to provide for an adequate amount of public involvement. This project has more than met that requirement. Review periods were extended for both the initial and second issue of the EA document. The project changes between the two publications resulted in an improved project with fewer impacts. That should be considered an effective public involvement effort.</p> <p>An EIS is required when the impacts resulting from a project are deemed significant to some element of the</p>

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55.3	96	2	The massive construction on the Northern part of the North Spokane Corridor will dead-end at Francis in just a couple of years.	physical or human environment. That test, as demonstrated in the published EA, has not been met. The appropriate level of environmental evaluation has been done and the published EA document demonstrates that to be the case.
05.2	96	3	There is a lack of political will and funding to complete the project from Francis to I-90.	As stated in other responses, this project will not reduce the need for or will to complete the North-South Corridor from Francis to I-90.
55.0	96	4	The Bigelow Gulch Road “improvement” as planned will become the alternative route from 395 to I-90. If built as planned in the next few years, the Bigelow Gulch Alternative Freeway will preempt the need to complete the long discussed and highly studied North Spokane Corridor.	Please see the response to 96-2, and comment letter 100. Please see the response to 96-2, and comment letter 100.
55.2	97	1	It has recently come to my attention that Spokane County is seriously considering not completing improvements to Bigelow Gulch Road, despite having funds available for those improvements. As a frequent traveler along that corridor, it comes as a shock to me that the County wouldn't take advantage of any and all opportunities to complete needed improvements in that corridor. As I am sure you're aware, the traffic on that road has increased significantly over the past two decades and virtually no improvements have been made. The roadbed is often deteriorating, the shoulders are too narrow, sight lines are hazardous, etc... These conditions have led to more and more accidents in the area and without the changes, the accident rate is sure to increase further.	Thank you for your comments.
55.0	97	2	The excellent work your staff did in improving Bigelow/Argonne interchange was a vast improvement and you are to be commended for the effort. I am in	Thank you for your comments.

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			disbelief that this would be the magnitude of the changes however. The east/west approaches to that intersection must be improved, and the sooner the better.	
01.3	97	3	Please mark me down as a concerned citizen who strongly believes that the entire corridor, from Francis to Forker, needs to be fully improved to meet the existing and expected demand from continued growth in that area.	Comments noted.
55.2	98	1	Please finish the work started on widening and paving Bigelow Gulch Rd. It is one of the busiest and dangerous roads in the county. Enough lives have been lost there!	Comments noted.
85.0	99	1	It appears that there is no prudent and feasible alternative to the "use" of Section 4(f)- protected resources. It would be helpful to have better maps in Chapter 5: Section 4(f) Evaluation with aerial photography covering the full length of each alignment, showing existing right-of-way, existing pavement, proposed right-of-way acquisition and proposed pavement; and other physical extensions/installations. An example would be the maps in Chapter 2: Project Description, which are helpful for general purposes and could be tailored for Section 4(f) purposes.	Thank you for your comments. FHWA has also concluded that there is no prudent and feasible alternative to the "use". Also, thank you for your comments regarding the maps for the 4(f) evaluation. We apologize for the diminished quality of the maps of 4(f) use (i.e., middle school). Please see the Final 4(f) Evaluation in Attachment G, which includes revised maps. Spokane County will provide detailed maps to FHWA as part of the design phase.
45.1	99	2	The focus of the project under Section 4(f) should be mitigation. The Department supports the replacement of the East Valley Middle School sports field and encourages the Washington Department of Transportation and Spokane County Public Works to continue to work with the officials with jurisdiction to identify and implement appropriate mitigation.	Comments noted. Spokane County is committed to working with the school district on the mitigation measures defined in Chapter 5 of the revised EA and presented as environmental commitments in Attachment D of the FONSI.
90.1	99	3	Regarding appropriate mitigation for historic properties, the Department defers to the State Historic Preservation Office.	Comment noted.

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05.0	99	4	It does not appear that there are any sites protected by Section 6(f) of the Land and Water Conservation Fund (LWCF) Act or Section 1010 of the Urban Park and Recreation Recovery (UPARR) Act that will be impacted by the project, although available maps were a little vague. The Department encourages consultation with the Washington Recreation and Conservation Office (RCO) to ensure that there are no conversion issues with either Section 6(f) or other resources protected by state grant programs. Please contact Ms. Kaleen Cottingham, Director, Washington RCO, Post Office Box 40917, Olympia, Washington, 98504.	Correct, there are no Section 6(f) lands as part of the project. See page 15 of the FONSI for a statement regarding section 6(f) lands. Thank you for your comments.
05.5	100	1	Your letter voices concerns about Spokane County publishing an Environmental Assessment (EA) as opposed to an Environmental Impact Statement (EIS). While the County is the lead agency on this project, it is important to note that WSDOT and the Federal Highways Administration (FHWA) were involved in the decision regarding the proper level of environmental documentation. It has been determined that the significance of environmental effects as they relate to the Bigelow Gulch Project required an EA level of documentation at this stage of the process.	Note: The following comments presented here as Letter No. 100, are taken from the body of a letter written by WSDOT Regional Administrator Jerry Lenzi, in response to the Letter No. 96 above. It is included to present the WSDOT position on construction of the North Spokane Corridor project.
03.5	100	2	As this is a Spokane County project, I am not in a position to comment on the public involvement efforts they have taken or their responses to public interaction on the project. I am aware that my Local Programs office coordinated with the Headquarters Local Programs Environmental Engineer, FHWA Area Engineer, Spokane County and their Consultant to sponsor more public meetings regarding the original 2006 Environmental Assessment and Section 4(f) Evaluation than is typically required, and doubled the length of the comment period at the request of the Prairie Protection Association.	Thank you for your comments.

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55.0	100	3	<p>As a result of the extent of public comment received during review of the original 2006 EA for this project, Federal Highways directed that a new document, a "Revised EA", should be written to address the voiced concerns. The numerous issues received from the 2006 EA review promoted responses documented in the 2007 Revised Environmental Assessment and Section 4(f) Evaluation and Appendices, which received concurrence from FHWA's Legal staff relative to sufficiency. The Revised EA process involved additional public meetings, and again doubled the length of the FHWA recommended 30 day comment period at the request of the Prairie Protection Association to allow the opportunity for additional public input.</p>	Thank you for your comments.
			<p>Your point 1 states that the construction of the NSC will stop at Francis Avenue if the Bigelow Gulch project is completed. While it is true that the construction efforts for the NSC as currently funded will build an operating facility from the Francis Avenue and Freya Street to the Wandermere vicinity, it is incorrect to assume or imply that the NSC is planned to conclude at Francis/Freya Interchange. This current construction is funded by the Nickel gas tax and through that funding a drivable segment of the NSC, which will begin in the vicinity of Francis/Freya Interchange in the south and extend to the vicinity of Wandermere on the north, will be opened to traffic. This will occur in phases beginning in 2009 and will be completely open in 2011.</p>	

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			<p>Concurrent with this effort, there are approximately \$152 million dollars of funding from the Transportation Partnership Account (TPA) and other sources. Through this funding WSDOT is actively pursuing design, right of way, and minor construction efforts for the NSC south of Francis Avenue. This includes actively purchasing needed right of way along the I-90 corridor, where the NSC and I-90 will connect. To date there is approximately \$530 million dollars either already invested or dedicated to be spent on the NSC project from both the Nickel and TPA funds. For this reason we do not concur with your point 1. While there is a considerable amount of work to be done and future funding to be secured, WSDOT is very actively pursuing efforts on the NSC both north and south of the Francis Avenue area. In response to your question number 3, I am not aware of any discussions or plans from any governmental agency that would support or confirm your concern that Bigelow Gulch would be considered as US 395 connecting with I-90.</p>	
55.0	100	4	<p>In regards to point 2, while the politicians will speak for themselves, from my perspective there is significant and growing political will and support for completion of the NSC project at the state, local and federal levels. The Governor has included the NSC as one of her top transportation projects in the State, stating that some of the key transportation investments include continuing progress on the Spokane North/South Corridor, among others. While it is true that the Governor indicated that there should be some local funding participation in funding the NSC, she has made that same overall statement for all transportation "mega" projects across the State.</p> <p>Major transportation issues facing the State include the difficulty in financing highway improvements of statewide significance. A variety of different</p>	<p>Thank you for your comments.</p>

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			<p>governments are involved in planning and providing transportation improvements. The federal government, state, counties, cities, and special purpose districts are all involved in financing transportation improvements for the citizens of Washington State. In the 2005 Legislative session, legislation was enacted that could lead to coordinating the planning for and provision of transportation facilities on a regional basis. This legislation significantly expanded the purpose and nature of transportation benefit districts. The Governor's comment regarding the need for local funding is supported by this recent legislative action which enables local governments to generate local revenue to contribute to solving local transportation problems.</p> <p>Based on the desire for multiple transportation improvements and the associated financing required, the Governor is simply pointing out that various regions of the State will also have to provide an additional contribution beyond gas tax. The alternative is we do not invest, the transportation system declines in its capability to support the increased traffic which negatively affects the movement of people and freight, and the corresponding lessening of our economic vitality.</p>	
55.0	100	5		Thank you for your comments.
			<p>Points 3 and 4 in your letter indicate that Bigelow Gulch will become the alternative route from US 395 to I-90 and as such will preempt the need to complete the NSC. It is clear through the transportation system modeling that a Bigelow Gulch facility will not replace the NSC. In fact these two facilities are different in their purpose and need and both are needed improvements for the future mobility requirements of the regional transportation system. The NSC has undergone a long and extensive planning process. The journey to establishing a FEIS involved significant analysis of the</p>	

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			no-build alternative along with various additional alternatives. The analysis was accomplished utilizing the approved regional transportation model. In response to your question number 2, I believe that the regional transportation system benefits from both the Bigelow Gulch project and the NSC along with the many other system improvements included in the adopted Metropolitan Transportation Plan are necessary for the future mobility and economic health of the overall region.	
01.0	100	6	Thank you again for contacting me and providing me with a copy of the correspondence you intend to send to area legislators. As you indicated a broad distribution of your letter I wanted WSDOT's views to be documented. I appreciate your interest in the regional transportation system and your participation in the public process regarding proposed improvements.	Thank you for your comments.