

## Response

## Comment B-14

B-14 Kaiser Aluminum

**KAISER**  
ALUMINUM

MEAD WORKS

December 19, 1991

Michael J. Pea, Jr.  
Washington State  
Department of Transportation  
N. 2714 Mayfair Street  
Spokane, WA 99207-2090

RE: PROPOSED NORTH/SOUTH FREEWAY

Mike:

Thank you for your courtesy in contacting Kaiser Mead and taking your time to explain to us the process by which a route will be selected for a North/South Freeway. Our initial reaction is one of support for such a freeway, but "not in our backyard."

As a responsible member of the local business community, Kaiser Mead appreciates the importance of selecting a freeway route which minimizes disruption in the lives of people who now live in its proposed path. Mindful of this basic objective, we submit Kaiser Mead's following recommendations for routing a North/South Freeway:

1. Our first preference is for a route which skirts the outer fringes of Kaiser Aluminum's property on the east, with the cross over to Route U.S. 395 at Farwell Road.
2. Our second preference is for a route between Kaiser Aluminum's North and South Plants.

Both of these routes, of course, require careful consideration of screening for visual effect, environmental impacts, locating entrances and exits between and to our facilities, and providing railroad access to Kaiser Aluminum's plants and suitable rights of way for our utilities.

We thank you for inviting Kaiser Mead's participation in the route selection process, and look forward to working with you on this important project for Spokane County.

Sincerely,



Kenneth R. Johnson  
Business Unit Manager - Mead

East 2111 Hawthorne Road, Mead, WA 99021 Phone: 509-466-3300

## Response

## Comment B-14

### B-14 Kaiser Aluminum

1. Measurements of existing noise levels were included in the noise model and used to project noise levels both direct and reflected. Prior to placing any noise wall in this vicinity additional modeling will be done to ensure proper performance of the wall. With or without construction of the Stoneman I/C the distance between the freeway and the Kaiser plant proper is considerable. "Two sources producing equal dBA ratings at a given location will produce a composite noise level 3 dBA greater than either sound alone. When two sources differ by 10 dBA, the composite noise level will be only 0.4 dBA greater than the louder source alone." (Noise Discipline Report for this EIS) Considering these factors, noise violations resulting from operation of the freeway are not anticipated.

2. Locating a freeway in the buffer zone would be consistent with the land use designation for this site. Further to the north and east the land use becomes urban. In the buffer zone, the freeway would prevent encroachment of residential development. The freeway would not alter the buffering distance from plant facilities to residential development.

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**KAISER**  
ALUMINUM

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MEAD WORKS

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DEPARTMENT OF TRANSPORTATION

October 20, 1995

Harold L. White  
Project Engineer  
Washington State Department of Transportation  
N. 2714 Mayfair Street  
Spokane, WA 99207-2090

Dear Harold:

Thank you once again for the courtesy of including Kaiser Aluminum in the planning process for the North Spokane Freeway. We have reviewed the Draft Environmental Impact Statement that you sent to us and have the following comments based on that review.

1. Page S-100v: Notes that for the North Connection Option, a sound barrier would be constructed on the E. Side of the freeway to deflect noise from the Mead Royal Trailer park.

One should be aware that the Kaiser plant makes significant amounts of noise. This noise is within allowable limits for the zoning now in place on and off the plant site. However the construction of a reflecting barrier could potentially redirect this noise, coupled with the added noise from the freeway and cause violations of the noise standard, (or complaints), from areas that are not now affected.

1

2. Page 3-5 refers to "large tracts of vacant industrial land are to the west, buffering the Kaiser Mead plant (see Figure 3-4).

This land is vacant but not unused. The buffer referred to is essential for the continued goodwill between an industrial manufacturing facility and the increasing encroachment of residential development.

2

3. Page 3-7 "Industrial land uses also contribute noise to the project area."

See comments 1 and 2.

4. Page S-i re: Description of the Proposed Action states the following specific objective: "Conform to State Implementation Plan (SIP) for CO and PM10

Page 4-2 re SIP a project "... cannot increase the frequency or severity of any existing violation of the standards."

Page 4-3 The CALINE3 model was used for air quality analysis and "a background concentration of 3 parts per million (ppm) for one hour concentration of CO was used as a reasonable and conservative estimate. (This is 30% of the State standard of 9ppm).

3

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HAROLD WHITE, P.E. East 2111 Hawthorne Road, Mead, WA 99021 Phone: 509-466-3300

## Response

## Comment B-14 (Continued)

3. A background concentration of 3 ppm is correct if you are modeling a suburban area. Higher concentrations are used for the CBD. The ISCST2 model is used for modeling point sources (like Kaiser's stack) and is inappropriate for modeling line sources like roadways. The 9 ppm (8 hour) standard will have to be met regardless of the source. Additional modeling will be required to determine the exact affects of the CO emissions from Kaiser and the freeway.

4. Correction made to p 4-72.

5. Correction made to figure 4-51.

6. Correction made to figure 4-51.

7. These comments were responded to in a letter dated January 8, 1993 from Harold L. White. A copy follows Kaiser's letters.

**KAISER**  
ALUMINUM

MEAD WORKS

Kaiser modeling done for the Washington Department of Ecology has shown that the ISCST2 model is necessary to model industrial sources such as Kaiser. CO modeling using this model, shows the highest concentrations of CO occur at the Northeast corner of the Kaiser Mead plant. While these are lower than the State standards, both the 1 hour and the 8 hour modeled concentrations are higher than the 30% used as the "reasonable and conservative estate" for existing concentrations. Kaiser believes that the North option could push existing CO concentrations above State standards in violation of the SIP.

3

5. Page 4-72 "The third Superfund site is the spent anode landfill on Kaiser Aluminum ...

This is not a "Spent Anode" landfill, it is a Spent Potliner landfill.

4

6. Page 4-140 "There are indications of a cemetery north of the R.A. Hanson Plant, near the BFA power line corridor. Figure 4-51 page 4-227, 4-228 notes block 87 on the map as the R.A. Hanson plant.

This is the Kaiser Aluminum Coke Calciner, also referred to as the Kaiser South Plant. R.A. Hanson owns the southernmost building of this site.

5

7. Figure 4-51, Pages 4-227, 4-228 Shows the Cyanide plume extending South into the main body of the Kaiser Mead plant.

The plume actually starts near the Northwest corner of the Mead plant proper.

6

8. Page 5-3 "After further review of the design, WSDOT adjusted the alignment to the north and east of the plant, which increases the distance and is in line with Kaiser's first recommendation, identified in their letter of December 19, 1991 (see page 5-24).

7

Kaiser has commented subsequent to this letter, (copies enclosed), and noted that the North option even when realigned, is not desirable. (See comments 1,2,3, and 4). Kaiser believes that the South option will be much less likely to impact the neighborhood with noise and CO impacts for the reasons noted above.

Aside from the fact that Kaiser Aluminum stakes an extremely high value on the current land use (as a buffer zone from the rapidly encroaching community as Spokane grows north) as pointed out in comment 2 above, we would like to point out the following:

8

Plans are under way for use of several parcels of the land north of the plant that conflict with the proposed north option. We are not at liberty to disclose the details of these plans at the present time.

2

East 2111 Hawthorne Road, Mead, WA 99021 Phone: 509-466-3300

## Response

## Comment B-14 (Continued)

8. Comments noted.

<p><b>KAISER</b> ALUMINUM</p> <p>MEAD WORKS</p> <p>Furthermore, when you consider that there is not a budget for the NSF project it seems that it would be prudent to adopt the most cost effective alternative for this project. On page 2-52 you reference the fact that the North option includes 4 miles of freeway whereas the South option is only 3 miles long (2-54). This equates to a minimum \$32 million savings by using the South option (p. S-i).</p> <p>For these reasons Kaiser Aluminum feels that the South option is the only route that is acceptable for use in the NSF project.</p> <p>Sincerely,</p>  <p>Kenneth R. Johnson Comptroller Kaiser Aluminum Mead Works</p> <p style="text-align: right;">1</p> <hr/> <p style="text-align: center;">East: 2111 Hawthorne Road, Mead, WA 99021 Phone: 509-466-3300</p>	<b>8</b>
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**Washington State  
Department of Transportation**  
Duane Berentson  
Secretary of Transportation

District 6  
2712 North Maylar Street  
Spokane, WA 99207-2090  
(509) 456-3000  
Fax: (509) 456-3089

January 8, 1993

Kenneth R. Johnson  
Business Manager  
Kaiser Aluminum, Mead Works  
East 2111 Hawthorne Road  
Mead, WA 99021

Dear Mr. Johnson:

I would like to take this opportunity to update your organization on the status of the North Spokane Freeway (NSF) Project.

Since our last meeting and subsequent receipt of your letter dated November 3, 1992 we have done some re-design of the roadway alignment in the vicinity of your Mead facilities. The attached map shows the latest design and one we are proposing to use to initiate the environmental studies.

The most obvious change is the shifting of the roadway alignment, of the north option, to a location further northeast on the Kaiser property. According to your latest letter this is more desirable because it allows for a greater buffer between your plant and the proposed freeway.

In response to the other concerns you outlined we offer the following preliminary responses:

**1. Additional access to industrial zoned property.**

This statement is somewhat vague in that we are not sure of what properties you are referring to. Access is an area of constant concern with any roadway project. The environmental level of study does not get to the detail necessary to cover every access point along a route. The study addresses general circulation issues by working with county and city planners in accommodating existing and future arterial plans. Later design and right-of-way plan development would address, in detail, access issues regarding property development.

Kenneth R. Johnson  
Kaiser Aluminum, Mead Works  
January 8, 1993  
Page 2

**2. Additional on-off ramps in the Market/Magnesium Road area.**

One of the key transportation aspects of this project is to provide good regional traffic movement. Regional traffic consists of traffic moving to and from Spokane to other areas. It also includes traffic that passes through Spokane to and from North Eastern Washington and other regions including Canada. It has been our intent to provide enough access to move these longer trips off the local street system and on to the freeway. This will reduce the volume of traffic on the local streets thereby reducing congestion.

The issue of local access to the NSF is a gray area and must be addressed by looking at the need. Studies to date show a need for a freeway. If interchanges are placed too close together, making very easy access on and off for local traffic, much of the function of the freeway would be lost. It is important to serve local traffic but not to the point of where the freeway begins acting as a local street. Adding a large number of short trips increases volume thus making the freeway prematurely congested. On the other hand, if interchanges are too far apart, the facility may not provide the needed service it should. We are striving for a balance between the two.

During the evaluation of interchange locations between Francis Avenue and SR 395, many of the east-west streets, as well as Market Street, were considered. Stoneman Road was chosen for an interchange location because it ties in with Spokane County's Arterial Road Plan for the "beltway route." Market Street and the NSF will be connected via the proposed "beltway route." To provide another interchange in the same area would be redundant. Traffic projections indicate that in the 2020 design year this plan would move traffic adequately. The Stoneman interchange connection works only on the north option. The south option would not connect to the "beltway" due to its proximity to SR 2 and SR 395. If the "beltway route" is not developed an interchange at Market Street or another arterial in this vicinity would be considered.

**3. Easy access to Hawthorne Road, Nevada, and SR 2.**

Based on our above justification, we feel that the access is adequate to all these roads. Even though direct access is not provided, travel by existing roads would be better than building a very costly, complicated (therefore confusing) interchange. This is especially true on the south option in and around where it crosses SR 2 and SR 395. If the Transportation Expertise

Kenneth R. Johnson  
Kaiser Aluminum, Mead Works  
January 8, 1993  
Page 3

Study finds that there is a need for additional access we will re-address the issue.

4. Screening for visual effects.

Of the two options, the south makes screening the easiest. This is because the preliminary vertical alignment allows for more cut sections and place more of the roadway below or at the same level as the existing ground. By moving the north option to the east it forces construction higher on the east hill. This equates to more of a view of the area and can mean more difficulty in screening particularly if more bridge is required.

5. Suitable right-of-way for your utilities.

This issue will be handled in later design and right-of-way plan preparation. At this time we are not aware of anything that would cause a problem in this area.

6. & 7. Access between Kaiser's north and south plants including rail access.

Our intentions are to maintain all existing access between Kaiser's facilities. This includes rail.

We hope that our latest design revision and the above responses to your other concerns meet with your organization's approval. If you have any further questions regarding the North Spokane Freeway Environmental Impact Statement, please feel free to call Rick Jordan or myself at 456-3004.

Sincerely,



HAROLD L. WHITE, P.E.  
Project Engineer

HLW:rdj  
RDJ  
Enclosure

cc: S. L. Chatterton, Asst. Dist. Admin. for Development  
Project File

**Response**

**Comment C-1**

C-1 Mike Brewer

1. Current plans, including the "TIP," by Spokane Regional Transportation Council incorporate the construction of the South Valley Arterial. At the time any changes may be proposed, impacts will be reassessed.

2. See Beltway/Bypass section of FEIS.

**North Spokane Freeway Environmental Impact Study  
Comment Sheet**

**Better Mobility Through Spokane**

Please use this form to express any comments that you have concerning this project. *8/17*

Name: Mike Brewer Date: 9/19/95

Address: 5022 N. Stone

Telephone: 509-483-2383

**Comments:**

*Page 5-v  
So Valley Arterial - Doubt this is realistic.  
Poor land usage. Should be used for  
future light rail transit to E Valley or  
even maybe onto Idaho*

1

*Page 5-v1  
No Metro Arterial Road Plan -  
The Beltway/Loop arterial in this proposal  
would be better served if it ran further  
North - Sunnival East to Morse + 395 +  
then around or maybe into University or  
further out - This is long term in the future*

2

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HAROLD WHITE, P.E.

**Response**

**Comment C-1 (Continued)**

- 3. Comments noted.
- 4. Correction to text noted.
- 5. Corrections to Table 1-6 noted.

**North Spokane Freeway Environmental Impact Study  
Comment Sheet**

**Better Mobility Through Spokane**

Please use this form to express any comments that you have concerning this project. 247

Name: Mike Brewer Date: 9/19/95

Address: 5222 N Stone

Telephone: 509 483-2383

**Comments:**

Page I-4 Economic Development - 3  
 Good Page - Industry + Housing + all -  
 Very Positive

Page I-12 4  
 5th line from top - ✓  
 "exposure into Consideration"

Page I-13 5  
 Division + Lincoln Road Suggest we  
 add to this. → 4th line from top in  
 listings - Table 1-6

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 HAROLD WHITE, P.E.

**Response**

6. Lincoln Street. corrected to read Lincoln Road.

7. See response 1.

**Comment C-1 (Continued)**

**North Spokane Freeway Environmental Impact Study  
Comment Sheet**

**Better Mobility Through Spokane**

Please use this form to express any comments that you have concerning this project. 3 of 7

Name: Mike Bremer Date: 9/19/95

Address: 5022 N Stone

Telephone: 509-483-2383

**Comments:**

Page 2-18  
Line 10 from top - Lincoln Street should read  
Lincoln Road.

Same page - middle  
Northern Connection plans - 1st sentence also  
uses Lincoln Street - should be Lincoln Road

Same page - bottom  
option B - 1st sentence  
Lincoln Street should be Lincoln Road

Page 2-19  
Middle of page - line "The Spokane line interchange  
connects the proposed Sawtooth Valley Arterial System"  
Does w/ comment on my page 1 of this group -  
Is this a true realistic?

6

7

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