SR 167 Master Plan
Planning and Environmental Linkages Study

# Attachment E, Appendix A. FHWA Coordination Points

**Final Study** 

**JUNE 2023** 









Prepared by:
Washington State Department of Transportation



# FHWA Coordination Point #1



Project: SR 167 Master Plan

Meeting Date: Time: 1-1:50 p.m. MS Teams

Subject: SR 167 Master Plan PEL – WSDOT/FHWA Coordination

### SR 167 Master Plan PEL - WSDOT/FHWA Coordination

- 1. Introductions and Meeting Purpose (All Facilitated by Robin 5 min)
  - Desired outcome: Provide introduction of SR 167 Master Plan PEL and receive feedback on PEL scope and process
- 2. SR 167 Master Plan Overview (Robin/Jeff 20 min)
  - Existing conditions
  - Study timeline
  - Planned study activities and scope
- 3. PEL Process and Coordination (Facilitated by Robin/Alex 20 min)
  - FHWA perspective on PEL candidacy (five-year timeline)
  - Necessary components of PEL scope
    - i. Development of purpose and need
    - ii. Major disciplines to cover: Transportation, environmental justice/equity, land use, noise, air quality and greenhouse gases, climate vulnerability, water resources, ecosystems, fish passage, historic and cultural resources
    - iii. Community and partner outreach, resource agency engagement
  - Roles and responsibilities, preferences for FHWA coordination
- **4. Wrap-up** (Robin 5 min)



Meeting Date: October 12, 2021 Time: 1:00 PM to 1:50 PM

Location: MS Teams

Subject: SR 167 Master Plan PEL – WSDOT/FHWA Coordination

# WSDOT SR 167 MP PEL WSDOT/FHWA Coordination Meeting Notes

**Attendees:** Robin Mayhew, Jeff Storrar, Alex Henry, Anne Broache, Laura Lloyd, Cameron Kukes, John Maas, Lucy Temple, Wendy Taylor, Margret Kucharski, Loreana Marciante, Chris Breiland, Sharon Love, Lindsey Handel, Mathew Kunic.

### **Introductions and Meeting Purpose**

Robin provided the group with an overview of the desired meeting outcome, noting that the goal is to provide an introduction of the SR 167 Master Plan PEL and receive feedback on the PEL scope and process to ensure it will meet federal guidance.

#### SR 167 Master Plan Overview

Robin gave an overview of the SR 167 Master Plan update. The study goals include analyzing existing and future conditions, incorporating information from the public and stakeholders, applying WSDOT's Practical Solutions Approach, and identifying near/medium/long-term multimodal transportation needs and strategies.

Robin discussed the development of the study area. The draft study area is based on Streetlight origin and destination data for 50th and 80th percentile trips, along with demographics analysis results. The team looked for concentrations of populations including but not limited to minority, low-income, and limited English proficiency when developing the study area, and equity will be a major focus during the project.

Robin also provided an overview of the project schedule and scope of work:

- Phase 1: The consultant team received notice to proceed in August for a first phase of work, which includes study planning and listening sessions with local cities and community-based organizations. This first phase will continue through mid-November. The team also plans to begin meeting with technical and policy advisory committees in November 2021, which will help the team to refine the study area, provide a vision and mission for the corridor, and finalize the community engagement plan.
- Phase 2: The second phase will include developing existing and future conditions data, developing/screening strategies, developing and evaluating multimodal scenarios, and producing the final report. Part of the scope of work will include evaluating future revenue opportunities. The SR 167 Master Plan currently needs to be completed in 2023, but depending on Legislative funding priorities, that timing may change.



Sharon asked whether engagement will happen with resource agencies, and suggested coordinating early as there may be datasets that agencies have that would help with the PEL. Robin asked if Sharon had suggested approaches for resource agency coordination, and Sharon said this coordination could take various forms depending on what WSDOT hopes to achieve during this PEL process. Sharon noted that the level of engagement with resource agencies will depend on how much PEL work WSDOT is prepared to potentially revisit during the NEPA process.

#### **PEL Process and Coordination**

Robin said she expects the process will result in a range of strategies and scenarios within a broad study area, so the scenarios may be broken into separate NEPA processes in the future. She noted that the team does not expect to arrive at a final or preferred scenario at the end of the PEL process.

Alex walked through several topics related to the PEL process for this project, including the five-year timeline, topics to be studied, and FHWA's preferences for coordination. Sharon provided overall feedback on the PEL Process:

- **DOT Guidance:** DOT is waiting for final PEL guidance from FHWA headquarters. Sharon requested that WSDOT seek review from FHWA, including headquarters (Lana Lau), on whether the PEL is meeting all requirements as the project is refined.
- Level of Detail: The PEL process can be used to support higher levels of NEPA (EA, EIS) analysis. The level of information provided in PEL will depend on what will be taken into NEPA without revisit detailed analysis, and what will be used as background for future NEPA processes. PEL can be used to support an EA instead of an EIS for many projects due to the level of information collected and documented in the PEL process.
- **Engagement:** PEL supports engagement when public and community input can be used most effectively in the planning process, before NEPA.
- **Terminology:** There is not a rule for using NEPA language in PEL, but it is beneficial to use NEPA terminology if the information will be carried over into NEPA. For example, using "purpose and need" and "logical termini" is recommended. WSDOT Environmental Manual Chapter 200 provides more guidance on this topic.
- Necessary Components of PEL Scope: The group did not object to the list of disciplines
  provided in the agenda. John and Sharon suggested including information about floodplains,
  wetlands, and stormwater. Sharon noted that not all topics typically covered in NEPA need to
  be included, but the PEL process is a good opportunity to identify which topics are most relevant
  and critical in the study area.
- Roles and responsibilities, preferences for FHWA coordination: Sharon requested
  including FHWA throughout the PEL process. Lindsey said Sharon can act as the point of
  contact and determine whether Lindsey or Matt should also attend meetings. Robin suggested
  inviting FHWA to participate in Technical Advisory Committee meetings. Sharon said that she
  would review agendas and decide who would be most appropriate to attend.

#### **Next steps and Wrap up**

- Meetings will be happening in Mid-November for advisory committees.
- Project team will be starting Phase 2, which includes the bulk of the analysis and scenario development, after the November meetings.
- Lucy is looking up PEL guidance regarding use of NEPA terminology and will provide information to the team.

# **FHWA Coordination Point #2**



Meeting Date: Monday, January 10, 2022

Time: 9:30am - 10:30am

Location: MS Teams

Subject: SR 167 Master Plan PEL – WSDOT/FHWA Coordination

# SR 167 Master Plan PEL - WSDOT/FHWA Coordination

#### 1. Introductions

#### 2. PEL Statutes/ Authorities

 Desired outcome: Receive concurrence on applicable statutes/authorities for the SR 167 Master Plan

## 3. Purpose and Need

 Desired outcome: Review draft Purpose and Need and discuss initial feedback. WSDOT will be requesting FHWA's concurrence on the document prior to finalizing

### 4. Evaluation Criteria and Next Steps

 Desired outcome: Provide overview of evaluation criteria to be considered and look ahead to upcoming study tasks and coordination points

#### 5. Wrap-up



Meeting Date: January 10, 2022 Time: 9:30 AM to 10:30 AM

Location: MS Teams

Subject: SR 167 Master Plan PEL – WSDOT/FHWA Coordination – Purpose and Need

# WSDOT SR 167 MP PEL WSDOT/FHWA Coordination Purpose and Need Meeting Notes

**Attendees:** Robin Mayhew, Alex Henry, Laura Lloyd, Lucy Temple, Loreana Marciante, Sharon Love, Lindsey Handel, April Delchamps, Diana Giraldo, Margaret Kucharski

### **Introductions and Meeting Purpose**

Alex provided the group with an overview of the desired meeting outcome, noting that the goal is to provide an overview of the PEL Statutes and Authorities receive feedback on the PEL Draft Purpose and Need to ensure it will meet federal guidance.

#### SR 167 Master Plan Statutes and Authorities

Alex gave an overview of the SR 167 Master Plan Statutes and Authorities. These included 23 USC 168, 23 CFR 450, 23 USC 139. Sharon agreed with the authorities and noted that there is a lot of overlap between the various regulations.

#### **PEL Draft Purpose and Need**

The FHWA team will have two (2) weeks to provide detailed feedback on the full purpose and need document. Laura presented the goal for this presentation which included engaging FHWA early in the purpose and need process to get feedback. This will increase the relevance of the PEL Study findings during future NEPA processes and inform the PEL Questionnaire. Laura noted that this purpose and need is intended to be general enough to cover the entire corridor and that project-level purpose and need statements would be developed during future NEPA processes and would correlate and explain the relationship to this more general purpose and need.

Sharon agreed with the approach of developing a corridor-wide purpose and need that could be used to inform future NEPA purpose and need statements at the individual project level. Sharon stated that this approach is preferred over attempting to establish a purpose and need intended to be brought forward word for word into an induvial project.

Laura presented the draft purpose (goal) statements and need statements.

Sharon inquired how the listed goals address single occupancy vehicle (SOV) travel, as this is something that is likely to be important to stakeholders. After discussion, it was agreed that Goal 5 addresses SOV trips in a way that is consistent with WSDOT's practical solution



framework. Sharon also commented that the emphasis on freight trips makes sense, as these trips are unlikely to shift to other modes.

Sharon asked about climate vulnerability and potential for flooding along the corridor. Laura confirmed that there are potentially vulnerable floodplains that will be considered and will be included in the environmental documentation. Laura noted that the WSDOT climate vulnerability GIS layer was being utilized to identify climate vulnerability for the SR 167 facility.

#### **Draft Evaluation Criteria Overview**

Laura presented the draft evaluation criteria, which is developed based off of the purpose and need statements.

### **Project Look Ahead Timeline**

Laura presented the general project timeline. The 3rd FHWA coordination point would happen in sometime in June 2022 and would be scheduled to discuss screening of alternatives. The 4th FHWA coordination point would happen sometime in October 2022 and would discuss the final PEL.

Sharon agreed that the purposed coordination points make sense and requested that she continue to be included in TAC and PAC meetings to stay informed in-between these coordination meetings.

### **Next steps and Wrap up**

Sharon recommended including language in the purpose and need introduction to explain how the purpose and need would be used to inform future project level NEPA purpose and need statements.

Sharon also committed to providing FHWA comments in two weeks. She will try to review and provide any major comments prior to the document going out to the TAC on January 12, 2022.

Sharon will continue to coordinate with WSDOT staff as additional PEL training becomes available.

Robin and April will reach out to Sharon to receive feedback on the Planning Study/PEL process graphic that they are working on.

# **FHWA Coordination Point #3**



Meeting Date: Wednesday, July 27, 2022

Time: 9:30am - 10:30am

Location: MS Teams

Subject: SR 167 Master Plan PEL – WSDOT/FHWA Coordination

# SR 167 Master Plan PEL - WSDOT/FHWA Coordination #3

1. Introductions

- 2. Recap of Master Plan schedule, vision, and goals
- 3. Review of Existing and Future Conditions Process
- 4. Project and Scenario Development and Refinement Processes
- 5. Engagement Overview and Lookahead
- 6. Wrap-up



Meeting Date: July 27, 2022

Time: 9:00 AM to 10:00 AM

Location: MS Teams

Subject: SR 167 Master Plan PEL – WSDOT/FHWA Coordination – Projects and Scenarios

# WSDOT SR 167 MP PEL WSDOT/FHWA Coordination #3 Projects and Scenarios - Meeting Notes

**Attendees:** April Delchamps, Alex Henry, Lucy Temple, Laura Lloyd, Daniel Dye, Sharon Love, Liana Liu

### **Introductions and Meeting Purpose**

Alex provided the group with an overview of the desired meeting outcome, noting that the goal is to ensure FHWA has an opportunity to provide input during project and scenario development, refinement, evaluation, and the final recommendation of projects to be evaluated in future NEPA documentation.

### Review of Schedule, Vision, Goals (Purpose Statements)

Alex gave an overview of the SR 167 Master Plan schedule, noting that we are in Phase 4 of the schedule. Alex presented the study vision as well as the study goals. The study goals are the purpose statements, which are used as criteria in refining projects and scenarios.

### **Existing Conditions Review**

Alex provided an update on the environmental baseline chapter of the Existing and Future Conditions Report. The chapter includes NEPA resources, and documents the existing conditions as well as next steps recommended during NEPA. The chapter was sent out to resource agencies for their feedback on the environmental baseline and any topics that needed further study. The team received comments from Ecology relating to fish passage, habitat, and hazardous materials.

#### **Developing and Screening Strategies**

Daniel presented the overall process for developing projects and strategies into five scenarios. Screening #1 involved identifying projects within the study area that could affect mobility on the SR 167 facility. Screening #2 included rating projects against the identified goals or purpose statements. Daniel described that each of the five scenarios has a unique theme, but all scenarios include multimodal and multiagency projects that focus on multiple goals of the master plan.

#### **Five Scenarios and Web Tool**

Daniel presented each of the five scenarios in more detail, describing the themes and examples of projects included in each scenario.



Laura presented a web application tool that is being used by the project team and technical committee members to view the projects within each of the scenarios. The tool includes filters for scenario name, mode type, project location, and rating from Screening #2. Laura noted that the tool can be and will be built upon and expanded in the future for screening three scenarios to a final recommendation. Liana and Sharon requested the link to the web tool so that they could utilize it. The project team will provide the link to the web tool. <a href="https://arcg.is/0qarm8">https://arcg.is/0qarm8</a>

Daniel described the methods and process for refining the five scenarios into three scenarios, noting that the best projects from any of the five scenarios could move into one of the three refined scenarios. The three refined scenarios will have new themes. The methods for moving from five to three scenarios include working closely with partners and soliciting feedback from committees; conducting detailed evaluations on equity, accessibility, traffic operations, modal gaps, environmental constraints, and cost; and community engagement.

## **Equity Priority Areas**

Laura presented the equity priority areas, noting that equity was included as a goal or purpose statement for the study. The equity priority areas represent areas with the highest concentrations of vulnerable populations. These areas will be used in analyzing scenarios to maximize benefits and minimize impacts to vulnerable populations. Laura noted that this layer will be used in analysis of the three refined scenarios.

#### Three Scenarios and Final Recommendation

Daniel presented the process for moving from three scenarios to a final recommendation, noting that the process is similar to the process used to move from five scenarios to three. The team will take a much deeper dive into analysis and soliciting feedback for this final scenario refinement. The process will include a detailed look at potential environmental impacts including equity and environmental justice. The process will also involve soliciting partner and community feedback through meetings, workshops, and an online open house.

Sharon stated that knowing the expected level of environmental documentation (CE/EA/EIS) will be important for the final recommendation of projects. Laura noted that the project team is including 'expected level of environmental document' as an assumption within the methods for environmental analysis. Sharon agreed with the approach of including this in the environmental analysis of three scenarios.

### **Engagement Lookahead**

Laura presented a summary of ongoing engagement including community engagement events and partner engagement events. The team noted that the online open house is open until July 29, 2022. Co-Creation workshops will be starting in August.

#### **Project Look Ahead Timeline**

Laura presented the general project timeline for FHWA coordination points. The 4th FHWA coordination point is anticipated sometime late fall 2022 or winter 2023, and would be scheduled to discuss the final recommendation and its adequacy to be carried into future NEPA processes, it would also include getting FHWA feedback on changes or additional information needed for the final report.



### **Next Steps and Wrap Up**

Sharon asked for clarification on how the project team would like to receive concurrence. It was agreed that the project team would request concurrence via email.

Lucy requested to be included on the TAC distribution list. April and Alex will ensure she is included.

April explained that there is ongoing work with Secretary Millar to establish planning context with the PAC. April asked if FHWA could provide context to federal funding, and Sharon provided a link with details on the bipartisan infrastructure law and offered to coordinate with other FHWA staff to answer specific funding context questions.

The FHWA team will have two (2) weeks to provide feedback/concurrence via email on the following.

- Methodologies and documentation for projects being carried forward into scenario refinement or projects no longer being considered
- Evaluation criteria and performance measures used for analyzing and refining projects and scenarios
- Overall decision-making process

# **FHWA Coordination Point #4**



Project: SR 167 Master Plan Planning and Environmental Linkages (PEL) Study

Meeting Date: Monday, June 5, 2023

Time: 11:00 a.m. to 12:00 p.m. PST

Location: MS Teams

Subject: SR 167 Master Plan PEL Study – WSDOT/FHWA Coordination Meeting #4

# SR 167 Master Plan PEL Study - WSDOT/FHWA Coordination Meeting #4

#### 1. Introductions

#### 2. SR 167 PEL Study Process and Engagement

• Desired outcome: Provide a summary of the overall work done and timeline for this PEL Study as well as engagement for the study.

# 3. Review of FHWA Coordination Meetings #1 - #3

• Desired outcome: Provide a summary of the FHWA coordination meetings held to date (Meetings #1 - #3).

#### 4. Updates to Final PEL Study

• Desired Outcome: Provide a summary of the updates made to the Final Study since FHWA's review.

#### 5. Discussion & Wrap-up

 Designed Outcome: WSDOT will be requesting FHWA's concurrence and signature on the Final Study.



Meeting Date: June 05, 2023

Time: 11:00 AM to 10:30 AM

Location: MS Teams

Subject: SR 167 Master Plan PEL – WSDOT/FHWA Coordination #4 – Final PEL Study

# WSDOT SR 167 MP PEL WSDOT/FHWA Coordination Meeting #4 – Final PEL Study

Attendees: April Delchamps, Laura Lloyd, Lucy Temple, Chris Breiland, Sharon Love, Mathew Pahs

# **Introductions and Meeting Purpose**

April provided the group with an overview of the desired meeting outcome, noting that the goal is to provide a summary of FHWA coordination points #1 through #3 and updates to the final study; and that WSDOT will request FHWA concurrence and signature following the meeting.

### SR 167 Master Plan PEL Study Process and Engagement

Desired outcome: Provide a summary of the overall work done and timeline for this PEL Study as well as engagement for the study.

April gave an overview of the SR 167 Master Plan PEL Study process using a graphic of the schedule with milestones where the project team held FHWA coordination points, committee meetings, resource agency coordination, and open houses. April also provided an overview of engagement for the study, noting that we have published materials in 7 languages, and that we reached over 1,000 community members at summer 2022 outreach events.

### Review of FHWA Coordination Points #1 through #3

Desired outcome: Provide a summary of the FHWA coordination meetings held to date (Meetings #1 - #3).

Laura presented a summary of FHWA coordination points #1 through #3, noting that the project team received concurrence from FHWA at each coordination point. Laura presented slides that showed FHWA feedback received during each coordination meeting along with a summary of how the study team incorporated this feedback.

### **Updates to Final PEL Study**

Desired Outcome: Provide a summary of the updates made to the Final Study since FHWA's review.

Laura and Chris presented a summary of the changes made to the Final Study and attachments to address FHWA comments and to incorporate feedback from the advisory committees.



Laura presented the small changes made to need statements for the project. The edits were to format the statements as traditional NEPA need statements. Sharon and Mathew agreed that the edits address comments and Sharon noted that the edits will also help set up future NEPA reviews.

Laura also summarized that the spelling of Bonney Lake has been fixed on maps globally throughout the report.

Laura summarized the edits made to the executive summary related to environmental resources including cultural resources, fish passage barriers, and environmental justice. Sharon and Mathew agreed that the changes made to the report for these resources looked good and that there were no additional edits needed. Sharon also noted that the change to cultural resources will support considering any potentially eligible properties whether they are listed or not on the NRHP.

Chris provided an overview of the edits made to the near-, mid-, and long-term timing for Final Study Recommendations. Chris noted that for the statewide low-income tolling program strategy the study team did not change the timing from near/mid to mid/long because the statewide low income tolling program could be implemented for other projects related to tolling beyond SR 167. Mathew and Sharon stated that they agree with this approach.

Chris also summarized that we created a chart to show the near-, mid-, and long-term timeframes for projects in a table, noting that since we don't have funding identified yet, we have several projects that show as both near- and mid- or mid- and long-term. Mathew noted that having a color coding along with 'yes' or 'no' could be helpful to the reader as long as this complies with 508 accessibility rules.

Chris reviewed a comment related to adding more information related to truck parking for Attachment B, noting that the study team added a new section to Attachment B to summarize the truck parking conditions, prior WSDOT studies completed, unmet truck parking demand, and funding. Chris also noted that truck parking has been added to the continued collaboration section of Chapter 6, Next Steps within the Final Study. Mathew noted that he agreed with the study team's approach for this comment, and that anything around the Port of Tacoma is very important in terms of truck parking.

Chris provided an overview of additional topics related to committee member feedback that the study team has identified for continued collaboration and coordination. Chris noted that the Equity Advisory Committee had concerns about the electric vehicle charging mandate. Chris also reviewed the land use coordination topic and provided context that the feedback we have heard has focused on the need for affordable housing. Sharon shared that there are funding opportunities for electric vehicle infrastructure and that the study team could consider adding a sentence to the report about this. Sharon provided the following link for the study team: <a href="https://www.fhwa.dot.gov/bipartisan-infrastructure-law/grant\_programs.cfm">https://www.fhwa.dot.gov/bipartisan-infrastructure-law/grant\_programs.cfm</a>. Mathew and Sharon agreed that the additions to this section look good.

Laura reviewed a comment related to removing special characters from public comments so that the formatting is a little cleaner. Sharon remarked that if the study team does not make edits based on this comment, it is okay. Laura noted that the team will check with the editor to see if we can do some cleanup.



Lastly, Laura reviewed wording changes to the HEAL Act overview within Chapter 5, stating that the changes were to help clarify differences between the HEAL Act and federal requirements for EJ. Sharon agreed with this approach and asked the team to add a statement that individual projects will comply with applicable regulations in place at the time of project review, regardless of state vs federal requirements.

### **Next steps and Wrap up**

Designed Outcome: WSDOT will be requesting FHWA's concurrence and signature on the Final Study.

April summarized that we have received a few agency support letters and are in process with a number of agencies to get letters. April noted that we will get the signatures from Brian Nielsen, Julie Meredith, and Ralph Rizzo.

Lucy suggested that the study team format a support/wrap-up letter for FHWA to review, update and sign. Lucy recommended that the letter include information on what lead to FHWA's decision on concurrence. The study team will provide a template letter for FHWA to revise and sign. The study team is requesting that this letter be signed and returned by June 16, 2023.

# FHWA Concurrence #1 - #3

### Laura Lloyd

From: Temple, Lucy <TempleL@wsdot.wa.gov>
Sent: Friday, December 9, 2022 4:32 PM

To: Laura Lloyd

**Subject:** FW: Documentation of FHWA Concurrence for SR 167 Master Plan PEL **Attachments:** SR167\_MasterPlan\_FHWAPEL\_PurposeNeed\_January2022.pptx; 10\_FHWA\_3

\_ProjectsScenarios\_Concurrence.pdf; 3\_FHWA\_1\_Introduction\_MeetingNotes.pdf; 6\_FHWA\_2 \_PurposeNeed\_Concurrence.pdf; SR167\_MasterPlan\_FHWAPEL\_ProjectsScenarios\_July2022.pptx

### Lucy Temple | she/her

WSDOT NEPA/SEPA/PEL Specialist Phone 360.705.7408 | Hours: M-F 8:00-4:30

From: Love, Sharon (FHWA) <sharon.love@dot.gov>

**Sent:** Friday, December 9, 2022 2:41 PM **To:** Temple, Lucy <TempleL@wsdot.wa.gov>

Subject: Documentation of FHWA Concurrence for SR 167 Master Plan PEL

Hi Lucy -

Thanks for bringing to my attention that I had not properly documents FHWA's concurrence on the following steps in the SR 167 PEL Study. I have been participating in the Technical Advisory Meetings and have appreciated the briefings you've held for our FHWA staff along the way. For the record, this e-mail will serve to document our concurrence on the following points in this process to date.

#### **Concurrence Point 1**

FHWA was briefed on the reasons for the PEL Study and the desired outcome and agreed verbally in meetings with the WSDOT team.

#### **Concurrence Point 2**

FHWA Concurred with the attached Purpose and Need for this PEL study via e-mail from Sharon Love to Alex Henry on January 31, 2022. The e-mail didn't explicitly say we concurred, but that was my intent.

#### **Concurrence Point 3**

FHWA Concurred with the following (as presented in the attached PowerPoint presentation) via e-mail from Sharon Love to Laura Lloyd on October 18, 2022

- Methodologies and documentation for projects being carried forward into scenario refinement or projects no longer being considered
- Evaluation criteria and performance measures used for analyzing and refining projects and scenarios
- Overall decision-making process

Thanks again, and let me know if you need anything else.

- Sharon

# Sharon P. Love, P.E. (she/her)

Environmental Program Manager FHWA Washington Division 711 S. Capitol Way Ste. 501 Olympia WA 98501 Office: 360.753.9558 Mobile: 202.961.9188

sharon.love@dot.gov

# Refer to Attachment F for FHWA Concurrence #4



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