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To: Gerald Henrikson Phone: 503-231-6927
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From: Jeff Graham Phone: 503-399-5749
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MESSAGE LEAD PLUS 2 PAGES
Gerald,
Here are my comments on the Cascade Locks Resort and Casino Project DEIS.
Jeff Graham

RECEIVED
MAY 15 2008
BUREAU OF INDIAN AFFAIRS
NORTHWEST REGIONAL OFFICE
OFFICE OF THE REGIONAL DIRECTOR

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Thank you.

Cascade Locks Casino, Resort and Interchange

Review Comment Worksheet

Cascade Locks Resort and Casino Project - Draft Environmental Impact Statement (Feb. 2008)

May 15, 2008

Comment No.	Name (Person making the comment)	Unit	Document	Page # Sheet #	Comment
1	Jeff Graham	FHWA	Cascade Locks DEIS	Summary, Page xxii, 3rd paragraph	Travel time from east of Cascade Locks are reported for the new roadways that would carry traffic with a new interchange compared with existing conditions. What are the travel times from West Cascade Locks to Forest Lane without the interchange?
2	Jeff Graham	FHWA	Cascade Locks DEIS	Summary, Page xxii, 4th paragraph	The FEIS will need to identify what measures will be implemented to minimize the effect of traffic generated by the resort and casino as it contributes to traffic congestion on WB I-84.
3	Jeff Graham	FHWA	Cascade Locks DEIS	Summary, Page xxii, 5th paragraph	The FEIS must indicate that BIA has received concurrence from SHPO in the Section 106 determination of "no adverse effect" to the Historic Columbia River Highway in order for FHWA to make a 4(f) de minimis finding.
4	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-9	Please revise the last sentence in the first paragraph under 2.2.2.4 to read "... of a fully directional interchange..."
5	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-9	FHWA supports the closure of the existing ramps of the Herman Creek and East Cascade Locks interchanges. FHWA cannot approve the proposed Interstate system access at Forest Lane without these ramp closures because leaving the existing ramps in place and adding new access would have an adverse impact on the safety and operation of I-84.
6	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-9	The second paragraph talks about the WB off ramp closure at the East Cascade Locks Interchange (ECLI). The DEIS should also discuss the restriction for the EB on ramp to trucks only. Will the EB ECLI on ramp and the Frontage Road be grade separated or an at grad intersection? This should be described as well.
7	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-9	The third policy point is paraphrased and doesn't include the need to consider adjacent interchanges in the analysis.
8	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-10	Please revise the first sentence in the first full paragraph to read, "A draft APDR has been prepared..."
9	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-10	When discussing and describing the operationally-acceptable alternative the second bullet only describes the closure of the WB off ramp at the East Cascade Locks Interchange (ECLI). Please describe the truck only restriction that will be imposed for the ECLI EB on ramp. Will the ECLI EB on ramp be at grade with the Frontage Road or will these two roadways be grade separated?
10	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-10	To the first sentence of the last full paragraph under Access Point Decision Report on page 2-10 please add, "in order to approve the Interstate access modification request."
11	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-11	In the second paragraph under Interchange Ramp Closures please describe the truck only restriction that will be imposed for the East Cascade Locks Interchange (ECLI) EB on ramp. Will the ECLI EB on ramp be at grade with the Frontage Road or will these two roadways be grade separated?
12	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-12	Under Local Roadway Improvements the first paragraph indicates that Forest Lane would be widened to include up to four vehicular traffic lanes. Doesn't this put the improvements outside the existing HCRH Programmatic Agreement and jeopardize the Section 106 "no adverse effect" determination and FHWA's ability to make a Section 4(f) de minimis determination?
13	Jeff Graham	FHWA	Cascade Locks DEIS	Figure 2-3	This figure shows the proposed Forest Lane Interchange but it is hard to read and needs more detail. Where are the lane configurations, intersection channelizations, proposed structures, or traffic signals? The FEIS will need to show the interchange layout that is proposed for construction in order to analyze the impacts and disclose mitigation.
14	Jeff Graham	FHWA	Cascade Locks DEIS	Figure 2-5	Please show the EB on ramp at East Cascade Locks Interchange restricted to truck use. Will the EB on ramp and the Frontage Road intersection be at grade or grade separated?
15	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-28	In the second to last paragraph on this page the FEIS will need to indicate that the Tribe and ODOT worked together to minimize traffic congestion generated by the resort and casino on WB I-84 and what those measures are.

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Comment No.	Name (Person making the comment)	Unit	Document	Page # Sheet #	Comment
16	Jeff Graham	FHWA	Cascade Locks DEIS	Pages 2-28/2-29	The FEIS will need to demonstrate that SHPO concurred in the BIA's Section 106 determination of "no adverse effect" in order for FHWA to make a 4(f) de minimis finding. Presumably BIA be consulting with SHPO on the determinations of eligibility and findings of effect in order to get to "no adverse effect."
17	Jeff Graham	FHWA	Cascade Locks DEIS	Page 2-41	Please show the EB on ramp at East Cascade Locks Interchange restricted to truck use. Will the EB on ramp and the Frontage Road intersection be at grade or grade separated?
18	Jeff Graham	FHWA	Cascade Locks DEIS	Page 3-8	Please describe what improvements could be allowed to the HCRH in order to have "no adverse effect" to the resource.
19	Jeff Graham	FHWA	Cascade Locks DEIS	Page 3-8/3-9	Implementing the proposed project will require amending the Cascade Locks TSP
20	Jeff Graham	FHWA	Cascade Locks DEIS	Page 3-26	Will the auxiliary lane have any impact to the Dry Creek wetland?
21	Jeff Graham	FHWA	Cascade Locks DEIS	Page 3-43/3-44	FHWA assumes that BIA be doing the Section 106 consultation determinations of eligibility and findings of effect.
22	Jeff Graham	FHWA	Cascade Locks DEIS	Page 4-9	In the first paragraph the DEIS talks about the closure of the WB ECLI off ramp. The DEIS should say that public use of the EB ECLI on ramp will be restricted and only commercial vehicles from the POE will be allowed to use the EB on ramp.
23	Jeff Graham	FHWA	Cascade Locks DEIS	Page 4-11	Shouldn't BIA be consulting with SHPO for Section 106 on the determinations of eligibility and findings of effect? This will be necessary in order to get to "no adverse effect" before FHWA can make a de minimis 4(f) finding.
24	Jeff Graham	FHWA	Cascade Locks DEIS	Page 4-28/29	Will the auxiliary lane have any impact to the Dry Creek wetland? How will stormwater runoff from the proposed interchange be treated? Table 2-1 on Page 2-34 says that > 72% of the 2-year 24-hour storm will be treated before discharge to Herman and Dry Creeks
25	Jeff Graham	FHWA	Cascade Locks DEIS	Page 4-128	Please check the v/c ratios in Table 4-19 against those in Table 19 and 20 in Appendix I.