

7 | Environmental Commitments



Chapter 7 discusses the environmental commitments by resource that would be used to avoid or minimize adverse effects that may result from constructing, operating, or maintaining the Build Alternative. For some resources, additional conservation measures are proposed to avoid affecting resources. In the case where effects cannot be avoided, mitigation measures are proposed. Measures are proposed separately for temporary effects that can occur during construction and those long-term, permanent effects. The mitigation measures are intended to be consistent with the requirements of the anticipated permits listed in the *Fact Sheet*; Washington State Department of Transportation will also comply with any additional permit requirements.

The Federal Highway Administration and Washington State Department of Transportation would have joint responsibility for adhering to the environmental commitments described in this chapter. Washington State Department of Transportation would implement the commitments, and some of the commitments would become special provisions in the contract with the contractor selected to construct the project.

Surface water, floodplains, and groundwater

Conservation measures for temporary effects

- A temporary erosion and sediment control plan shall be prepared prior to the start of construction and adhered to throughout the process. All reasonable measures shall be used to assure that construction activity will be in compliance with local and state standards.



KEY POINT

Potential mitigation measures are discussed for the temporary effects and the long-term effects of the Build Alternative only.

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**DEFINITION****WHAT IS NTU?**

Nephelometric Turbidity Units, measured with a turbidimeter, shows how light is scattered by suspended material in water. NTU is an indicator of water clarity.

- During project construction, all erosion and stormwater control measures will aim to either meet or exceed the current *Washington State Department of Transportation Highway Runoff Manual* requirements.
- Stormwater discharges from the project site meeting the National Pollutant Discharge Elimination System General Construction Stormwater permit benchmark from 0–25 NTU are presumed to be in compliance with the state surface water quality standards (Chapter 173-201 of the Washington Administrative Code). Construction monitoring will follow the *2008 Washington State Department of Transportation Highway Runoff Manual* requirements.
- In addition to a temporary erosion and sediment control plan, the project will include a spill prevention control and countermeasures plan. These plans will guide actions to control spills and associated pollutants throughout the project work areas. Spill prevention control and countermeasures plan components will include but are not limited to staging, storage, maintenance, refueling areas and waste sites. It will be the responsibility of the project sponsor and its contractors to structure their operations in a manner that reduces the risk of spills or the accidental exposure of fuels or hazardous materials to waterways or wetlands and provide for the prompt and effective cleanup of spills. The spill prevention control and countermeasures plan will help to avoid and mitigate when necessary for potential contaminant spills that could affect groundwater as there are public and private water wells in the study area.
- Spill control best management practices, including the spill prevention control and countermeasures plan, proper storage, and containment facilities shall be used during construction to minimize the effects of a spill. Contractors are required to prepare and implement the spill prevention, control, and countermeasures plan in accordance to Washington State Department of Transportation Standard Specification 1-07.15(1). Specific spill control best management practices can be found in Volume 2 of the Washington State Department of Ecology *Stormwater Runoff Manual for Western Washington*.

Conservation measures for long-term effects

- Stormwater treatment and flow attenuation would be a part of the project. The proposed locations of water quality and quantity BMPs for highway runoff as well as stormwater management requirements are described in the *Preliminary Hydrology Analysis Report* for the project.
- All stormwater facilities require routine inspection and maintenance and would be designed to facilitate these functions. Maintenance will be based on regular inspections as deemed necessary and by the level

of funding provided by the Washington state legislature. Maintenance practices will follow Washington State Department of Transportation standards for protecting roads and the environment including the BMPs established in Section 5-5 of the current *Washington State Department of Transportation Highway Runoff Manual*.

- To comply with Federal Emergency Management Agency and Clark County's floodway criteria, the culvert replacements and extensions must not cause an increase in the 100-year floodway elevations, relative to the existing condition.

Mitigation measures for long-term effects

- Wetland mitigation will likely involve a combination of wetland re-establishment, creation, rehabilitation, and/or enhancement. The Wetland Delineation Report presents the Washington State Department of Ecology baseline replacement ratios for wetland mitigation, and the acreage of mitigation that will likely be required under each scenario. Buffers will be applied to all wetland mitigation areas in accordance with state and federal guidelines, as published in *Wetlands in Washington State – Volume 2: Guidance for Protecting and Managing Wetlands*.
- When possible, trees removed from the riparian areas could be salvaged and used for woody debris placement within environmental mitigation sites
- Disturbed riparian areas will be seeded to improve water quality and planted with woody species to provide long-term bank stabilization and in-stream shading.
- Because there are no existing stormwater treatment facilities, the project would retrofit approximately six acres of additional existing impervious surfaces for enhanced water quality treatment.
- Restoration activities will include restoration of in-stream habitat, stream channel reconstruction to restore natural channel morphology, reestablishment of floodplain connectivity, and restoration of riparian plant communities.

Biological resources

- Comply with and implement the terms and conditions for protection of biological resources as specified in the Biological Opinion issued by the National Oceanic and Atmospheric Administration – National Marine Fisheries Service.

Mitigation for temporary effects

Temporary erosion sediment control, spill control, and water quality

- Implement a site-specific temporary erosion sediment control plan to minimize erosion and sedimentation.
- Implement a site-specific spill prevention, control and counter-measures plan to minimize spills and ensure all harmful materials are properly stored, contained, and disposed.
- Comply fully with state water quality standards.
- Materials will be clean, covered where appropriate, and placed in a manner to prevent erosion.
- Treat any sediment-laden wastewater (in an upland area) produced by the project prior to discharge.
- Ensure that equipment operating below the ordinary high water mark use only vegetable based oils in hydraulic lines.
- Equipment, such as generators, within 50 feet of the ordinary high water mark will be diapered or provided another type of containment as approved by Washington State Department of Transportation.
- Protect all inlets and catchments from fresh concrete, tackifier, paving or paint striping, as necessary, in case inclement weather unexpectedly occurs.
- Avoid conducting paving or stripe painting operations during rainy weather.
- Fresh concrete and/or concrete by-products shall be prevented from entering surface waters during construction. Any water having direct contact with uncured concrete shall be contained and treated or removed from the site (as appropriate) to prevent discharge to surface waters and/or wetlands.
- Establish concrete chute cleanout areas to properly contain wet concrete and wash water outside of environmentally sensitive areas.
- Inspect equipment daily for leaks and proper function. Ensure that equipment is clean and free of external petroleum-based products.
- To the extent practicable, fuel and maintain equipment at least 150 feet from wetlands marked for preservation and from the ordinary high water mark of streams or as approved by a Washington State Department of Transportation biologist.
- Any waste resulting from the project shall become the responsibility of the contractor and will be disposed at a properly permitted site of their choosing.

Temporary access

- Locate staging areas beyond the ordinary high water mark and outside of environmentally sensitive areas.
- Staging and temporary access areas will occur on existing roadways whenever possible.

Footprint minimization

- Install high visibility fencing around preservation areas before construction to avoid unintended effects to vegetation, wetlands, historic or archaeological resource sites, riparian zones, or other sensitive areas.
- Limit vegetation removal and retain large trees to the extent practicable. Protect root zones of the trees that will be retained.

Revegetation

- Restore vegetation and roadside/environmental function to areas of permanent and temporary disturbance in accordance with Washington State Department of Transportation *Roadside Classification Plan*.

In-water work

- Comply fully with the terms and conditions of the hydraulic project approval issued for the project by the Washington State Department of Fish and Wildlife.
- Comply with the terms and conditions of the biological opinion issued by the National Oceanic and Atmospheric Administration – National Marine Fisheries Service and the US Fish and Wildlife Service.
- Any temporary dewatering of the in-water work zones shall be preceded by work area isolation and fish removal/relocation (as necessary). Fish handling shall be conducted by a trained and qualified biologist.
- Dewater identified in-water work areas and relocate fish outside of the study area before in-water work begins. The National Oceanic and Atmospheric Administration – National Marine Fisheries Service and Washington State Department of Fish and Wildlife will be notified in case of accidental fish kills.
- Conduct in-water work during the appropriate in-water work window for each watershed, as determined by the Washington State Department of Fish and Wildlife:
 - East Fork Lewis River watershed: July 16 – September 30
 - Salmon Creek watershed: July 16 – September 30
 - Gee Creek watershed: July 16 – September 30

- The project will, to the extent practicable, complete all necessary bank protection prior to releasing water back into the in-water work zone.
- Reintroduction of water to the in-water work zone shall be done gradually and in stages so as to minimize the mobilization of sediments.

Mitigation for long-term effects

Vegetation and wildlife resources

- Planting trees of size comparable to the mature trees proposed for removal in riparian zones is not practicable. Revegetate and restore disturbed areas, including clear and grub slopes, areas within or adjacent to riparian zones, and wetlands with dense native vegetation as appropriate. Native woody and herbaceous vegetation would be used to restore and enhance functions (including wildlife habitat) lost to construction in the study area.

Fish resources

- When possible, use trees removed from the riparian areas to enhance habitat at Mill Creek North, Sunset Oaks, and other environmental mitigation areas. Disturbed riparian areas would be seeded and planted with a preference for woody vegetation to provide in-stream shading and prevent sediment loading to streams.
- Re-establish riparian vegetation in currently developed areas:
 - South of SR 502 and on the west side of NE 72nd Avenue, a tattoo business would be demolished and the land adjacent to Mill Creek (less than 0.1 acre) would be planted with riparian plant species and restored to riparian habitat.
 - On the southeast side of SR 502 at Dollars Corner, a realty business would be demolished and the land adjacent to Mill Creek (approximately 0.2 acres) would be planted with riparian plant species and restored to riparian habitat.
- At the Sunset Oaks wetland mitigation site, restore Curtin Creek to a more natural, functioning stream. The Curtin Creek channel would be reconstructed to provide gradual winding across the site with the new channel ranging between 3,000 and 5,000 linear feet and would be approximately three feet deep and 10 feet wide. In-stream work would occur within the designated in-water work window.
- Improve habitat at the Mill Creek North mitigation site. A section of the creek would be reconstructed to restore natural channel morphology, re-establish floodplain connectivity, and restore native riparian plant communities. In-stream work would occur in the designated in-water work window.

Wetlands

Mitigation for temporary effects

- Implement compensatory mitigation for unavoidable effects to wetlands in accordance with the Clark County Code 40.450, Section 404 of the Clean Water Act, Governor's Executive Order 90-04, Washington State Department of Ecology, US Army Corps of Engineers and US Environmental Protection Agency Wetland Mitigation in Washington State - Part 1: Agency Policies and Guidance, and Washington State Department of Transportation Directive 31-12.
- Conduct all construction activities in or near waterways and wetlands in accordance with Washington State Department of Transportation Standard Specifications in order to minimize erosion and sedimentation. Best management practices will be used and could include temporary and permanent erosion control methods comprised of silt fences, retention basins, detention ponds, interceptor ditches, seeding, riprap of exposed embankments, erosion mats, mulching, and a number of other measures.
- When designing stormwater treatment facilities, maintain the existing drainage courses to the full extent practicable.
- Use standard erosion control techniques during construction.
- Leave as much native vegetation as possible in the right of way as a buffer for wildlife habitat and to maintain habitat connectivity.
- Minimize clearing of trees. Unavoidable clearing should be mitigated by planting suitable native trees along nonforested sections of stream banks within or near the study area.
- Restore native vegetation where possible in the right of way to provide buffers for sensitive areas and to enhance habitat connectivity.

Conservation measures for long-term effects

- Bridge piers and/or retaining walls should be placed as far upslope as possible from the wetland and/or stream channel to minimize effects.
- Replace highway ditches with new flat-bottom ditches adjacent to the widened highway.
- To the extent possible, avoid effects to wetlands with the greatest structural and species diversity.

Mitigation for long-term effects

- Implement a comprehensive watershed/landscape based mitigation plan for wetland, wetland buffer, and aquatic resources affected by

the project. Wetland mitigation sites would be constructed within the affected watersheds to replace and enhance hydrologic, water quality, and wildlife functions affected as part of project development and following all applicable federal, state, and local mitigation requirements.

- Adopt a soils and landscape-based approach to selecting potential wetland mitigation sites within the Gee Creek, East Fork Lewis River, and Salmon Creek watersheds to provide maximum watershed and ecological benefits. Data obtained from the Soil Survey of Clark County will be used to research a suite of soil characteristics including; hydrologic soil groupings, infiltration rate, hydraulic conductivity (Ksat), estimated depth to seasonal high water tables, suitability for agricultural ponds, shallow slopes, soil texture, woodland suitability, and forestland productivity.
- Create multiple mitigation sites within the Gee Creek, East Fork Lewis River, and Salmon Creek watersheds. The selection of all mitigation sites will follow current watershed approach requirements as defined by Washington State Department of Ecology and the US Army Corps of Engineers in order to maximize overall environmental and aquatic function in the affected watersheds. The Sunset Oaks and Mill Creek North mitigation sites have been identified as locations for compensatory wetland mitigation and fish habitat restoration for the project. Planting of woody vegetation species would be part of the mitigation. If additional mitigation sites are identified, each would be analyzed and receive necessary environmental clearance.
- Develop detailed goals, performance criteria, and contingency plans for all mitigation sites as part of the final wetland mitigation plan consistent with local, state, and federal wetland permits and requirements.
- Apply rigorous monitoring methods, integrated plant establishment techniques, and principles of adaptive management during the 10 year establishment phase of the mitigation sites to assure compliance with documented performance criteria. If monitored performance criteria are not met, the contingency plan would be implemented to correct any potential problems.

Geology and soils

Mitigation for temporary effects

- Effects related to soil erosion would be minimized through best management practices during construction. The construction contractor would be required to prepare and implement a temporary

erosion and sedimentation control plan prior to construction. The plan would include measures to reduce erosion of exposed soils, excavated material, and fill material. The contractor would also be required to implement dust control during construction.

- Effects related to high groundwater and wet weather working conditions would be minimized through the inclusion of special provisions for construction delays for weather, excavation in wet soil conditions, dewatering when excavating, erosion control, and drainage.

Mitigation for long-term effects

Long-term effects such as subsidence and liquefaction will be adequately addressed if the Washington State Department of Transportation *Geotechnical Design Manual* is followed and a proper geotechnical investigation is performed. Poor subgrade materials can also be addressed by following the *Geotechnical Design Manual*. Sections of the *Geotechnical Design Manual* that address these effects include, but are not limited to, Section 5.9.2 – Peat/Organic Soils, 6.5.2 – Liquefaction, 9.2.4 – Embankment Settlement Assessment, 9.3 – Stability Mitigation, 9.4 – Settlement Mitigation, 11 – Ground Improvement, 16 – Geosynthetic Design, and 17.4 – Culverts. Additionally, by following the applicable Washington State Department of Transportation maintenance procedures for the new facility, long-term effects from operation and maintenance of the facility would be minimized.

Land use, relocations, farmlands and public lands

Mitigation for temporary effects

- Provide notice of upcoming traffic effects to property and business owners in the study area on a weekly basis.
- Provide residents, tenants, and property owners in the study area with advance notice of potential access or utility disruptions as a result of construction activities.

Mitigation for long-term effects

- Comply with all permit conditions of approval and/or mitigation measures.
- Conduct all right of way acquisitions and residential and commercial relocations in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as well as the Washington State Relocation Assistance – Real Property Acquisition Policy. All affected property owners will be compensated,



DEFINITION

WHAT IS SUBSIDENCE?

Subsidence is the sinking or downward movement of the ground surface.



DEFINITION

WHAT IS LIQUEFACTION?

Liquefaction is a process in which water-saturated soil temporarily loses its strength and acts as a fluid. Liquefaction in fill soils can be triggered by earthquakes

**DEFINITION****WHAT IS PRIME FARMLAND?**

Prime farmland is highly productive cropland as designated by the US Department of Agriculture's Natural Resources Conservation Service.

**KEY POINT**

Washington State Department of Transportation offers language interpretation services by calling (360) 759-1310 or 1 (866) 279-0730. It is necessary to speak at least limited English so that your request can be responded to appropriately.

at fair market value, for property rights acquired and relocation assistance will be provided. The Uniform Act provides protection and assistance for people affected by the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects. This law was enacted by Congress to ensure that people whose real property is acquired, or who move as a direct result of projects receiving federal funds, are treated fairly and equitably and receive assistance in moving from the property they occupy.

- Follow the substantive requirements of the applicable federal, state, and local land use statutes, including zoning and critical area regulations, to protect land uses, resource lands, and critical areas.
- Minimize the conversion of prime farmland to non-agricultural uses.

Social, environmental justice, utilities, and economic resources

Mitigation for temporary effects

- Plan construction activities to allow reasonable access to all private properties at all times during the construction period.
- Notify community residents, business owners, property owners, and tenants of planned construction activities, planned temporary road closures and detours, expected congestion and delays, changes in commonly used travel routes, and the schedule for these activities. Notification methods could include press releases, newsletters, mailers, meetings, variable message signs in the project corridor, or fliers. Notification should be given in foreign languages commonly spoken in the community (e.g. Spanish and Russian).
- Plan temporary roadway closures to minimize effects on community gatherings, special celebrations, or other similar events or activities.
- Inform Clark County, City of Battle Ground, public transit agencies, school districts, and other relevant local government agencies as well as community businesses of planned construction activities, temporary road closures and detours, and the schedule for these activities.
- Provide advance notice if utilities would be disrupted, and schedule major utility shut-offs during low use times of the day.
- Develop methods by which residents and business owners can convey their concerns about construction activities and the effectiveness of mitigation measures during the construction period (e.g. advertise a project phone number, address, and email).
- Conduct public information campaigns to encourage patronage of businesses remaining in the project corridor during the construction period.

Mitigation for long-term effects

- Implement provisions as required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, as well as the Washington State Relocation Assistance – Real Property Acquisition Policy, for all properties purchased for needed right of way. Compensate, at fair market value, all affected property owners for property rights acquired and provide relocation assistance.
- Provide housing of last resort if needed. The available housing in the vicinity is expected to provide suitable relocation housing for displaced residents. But sufficient numbers of comparable replacement housing may not be available.
- Compensate property owners affected by new access control along SR 502 through Washington State Department of Transportation access control hearing procedures.

Historic and archaeological resources

Mitigation for temporary effects

- Develop and implement an inadvertent discovery plan. If unidentified archaeological resources or human remains are encountered during construction, work should immediately cease in the vicinity of the discovery to avoid further damages to the resource. Washington State Department of Transportation, Federal Highway Administration, Washington State Department of Archaeology and Historic Preservation Office, and affected Native American tribes should be notified so the significance of the discovery can be evaluated and the appropriate course of action implemented.

Mitigation for long-term effects

- Implement and comply with the mitigation stipulations contained in the memorandum of agreement signed by the Federal Highway Administration, the US Army Corps of Engineers, the Washington State Historic Preservation Officer, Washington State Department of Transportation, and the Chinook Tribe, and Cowlitz Indian Tribe (see Appendix C, *Memorandum of Agreement for Historic and Archaeological Resources*).

Visual quality

Mitigation for temporary effects

- To the extent practicable, shield construction lighting and/or focus it on work areas to minimize spillover of artificial light into adjacent areas.



DEFINITION

WHAT IS THE UNIFORM RELOCATION ASSISTANCE AND REAL PROPERTY ACQUISITION POLICIES ACT?

The Uniform Relocation Assistance and Real Property Acquisition Policies Act requires that comparable decent, safe, and sanitary replacement housing within a person's financial means be made available before that person may be displaced. When such housing cannot be provided by using replacement housing payments, the Act provides for "housing of last resort." This housing may involve the use of replacement housing payments that exceed the Act's maximum amounts. Housing of last resort may also involve the use of other methods of providing comparable decent, safe, and sanitary housing within a person's financial means (Washington State Department of Transportation, 2005).

- To the extent practicable, limit traffic stoppage and lane closures to off peak travel hours.

Mitigation for long-term effects

- To the extent practicable, contour leftover material within the study area in a way that blends the material with the surrounding landscape.
- Use luminaires (lighting units) and sign structures that are consistent with the I-5/SR 502 interchange.
- Implement the Washington State Department of Transportation *Roadside Classification Plan* policies pertinent to permanent vegetation restoration to blend disturbed areas with the surrounding landscape, reduce negative visual effects to surrounding properties, and to restore environmental function.

Noise

Abatement for temporary effects

- Limit noisier construction activities, such as pile-driving and jack-hammering, to between 7 a.m. and 10 p.m. to reduce construction noise levels during sensitive nighttime hours.
- Equip and maintain construction equipment engines with adequate mufflers to reduce their noise by five to 10 decibels (US Environmental Protection Agency, 1971).
- Turn off construction equipment during prolonged periods of nonuse to eliminate noise.
- Locate stationary equipment such as compressors or generators away from noise-sensitive receptors to decrease noise.

Abatement for long-term effects

Analysis of traffic noise levels for the build alternative concluded that 61 residences and three churches would exceed the Federal Highway Administration Noise Abatement Criteria as described in the Washington State Department of Transportation *Traffic Noise Analysis and Abatement Policy and Procedures*. Abatement of long term noise effects was thoroughly analyzed at each of the affected sites. The following is a list of typical traffic noise abatement measures that Washington State Department of Transportation considers.

- Implementing traffic management measures
- Acquiring land as buffer zones of for constructing noise barriers or berms.
- Realigning the roadway

- Sound insulation of public use or nonprofit institutional structures
- Constructing noise barriers or berms

None of these measures were found to be feasible or reasonable, as they did not meet criteria stated in the Washington State Department of Transportation *Traffic Noise Analysis and Abatement Policy and Procedures*.

Hazardous materials

Mitigation for temporary effects

- Conduct initial site assessments of all properties where a full or partial acquisition is planned to accurately assess the potential for existing environmental contaminants on each property, including any soils, groundwater, sediments, surface water, and vapors present.
- Arrange with utilities to remove and relocate transformers as necessary along the corridor.
- Conduct pre-demolition asbestos and lead surveys for all structures to be demolished. If necessary, proceed with removal and disposal in accordance with regulations.
- Evaluate structures to be demolished for the presence of hazardous materials. Conduct site assessments as necessary to evaluate soil and groundwater conditions in the vicinity of the hazardous materials. Remove and dispose of hazardous materials, and remediate contaminated soil and groundwater in accordance with applicable regulations.
- Evaluate soil conditions in the vicinity of identified hazardous materials sites during construction excavation and grading. In the event hazardous materials are encountered, soil and groundwater shall be characterized to determine appropriate handling and disposal requirements in accordance with applicable regulations. In the event an abandoned underground storage tank is encountered, the underground storage tank and associated contamination will be addressed in accordance to the regulations.
- Remediate as necessary in accordance with applicable regulations.
- Comply with applicable federal, state, and local regulations that govern the storage, use, transportation, and disposal of petroleum products and other toxic materials, including asbestos, lead, and PCBs.

Mitigation for long-term effects

- During highway operation after construction, traffic accidents and hazardous materials spills are managed in accordance with the Washington State Department of Transportation *Southwest Region Emergency Response Plan*. Washington State Department of Transportation maintenance employees coordinate with the

Washington State Patrol who is responsible for implementing safety measures at the site and coordinating with the Department of Ecology for the cleanup of hazardous materials.

Air quality

Mitigation for temporary effects

- Set up construction areas, staging areas, and material transfer sites in a manner that reduces standing wait times for equipment, engine idling, and the need to block the movement of other activities on the site. These strategies could reduce fuel consumption by reducing wait times and ensuring that construction equipment operates efficiently.
- Spray soils exposed during construction to vehicle traffic with water or other dust palliatives.
- Remove particulate matter deposited on paved public roads to reduce mud and resultant windblown dust on area roadways.
- Maintain as many traffic lanes as possible during peak travel times to reduce air quality effects caused by increased congestion.
- Place quarry spill aprons where trucks enter public roads to reduce the amount of mud tracked out.
- Use the Best Management Practice (BMP) of planting vegetative cover on graded areas that would be left vacant for more than one season to reduce windblown particulates in the area.



DEFINITION

WHAT ARE DUST PALLIATIVES?

Dust palliatives are chemicals or compounds applied to road surfaces to reduce dust created by traffic, including emissions of particulate matter (size 10) and deposition of particulate matter.

Mitigation for long-term effects

Because the mobile source air toxic emissions are not expected to increase, effects on the climate changing greenhouse gases are expected to be minimal, no exceedances of the National Ambient Air Quality Standards are anticipated, and no significant adverse air quality effects are expected from the project. Therefore, no mitigation measures would be required.

Energy

Mitigation for temporary effects

- Implement traffic management plans that minimize delay and vehicle idling.

Mitigation for long-term effects

Since the project would have no effect on long-term energy consumption, there would be no adverse effects, and therefore, no mitigation is necessary.