

SR 520 Pontoon Construction Project

Appendix T Draft Environmental Impact Statement Comments and Responses Report



SR 520 Pontoon Construction Project Final Environmental Impact Statement

Draft EIS Comments and Responses Report

Prepared for

Federal Highway Administration
Washington State Department of Transportation

Consultant Team

HDR Engineering, Inc.
Parametrix, Inc.
CH2M HILL
Parsons Brinckerhoff
ICF Jones & Stokes
Michael Minor and Associates
Cherry Creek Environmental
J. Irwin Writing/Editing

November 2010



Draft EIS Comments and Responses Report

Introduction

This appendix presents all comments received during the State Route (SR) 520 Pontoon Construction Project Draft Environmental Impact Statement (EIS) public comment period and the response to each comment. The comment period began May 28, 2010 and ended July 12, 2010. During the comment period, the Federal Highway Administration (FHWA) and Washington State Department of Transportation (WSDOT) received 32 comment submittals. Comments were submitted via email, the project Website online comment form, mail, and verbally and written at the Draft EIS public hearing.

Each comment submittal is presented in its entirety in the order shown in the following index. The comment submittal is on the left side of the page, and each individual comment (a comment on a specific topic) has been delineated separately and assigned a comment number. The response to each individual comment, as indicated by the corresponding comment number, is on the right side of the page.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

July 12, 2010

Mr. Randolph L. Everett, Seattle Major Projects Oversight Manager
Federal Highway Administration
711 S. Capitol Way, Suite 501
Olympia, Washington 98501

Margaret Kucharski
WSDOT Environmental Lead
SR 520 Pontoon Construction Project
600 Stewart Street, Suite 520
Seattle, WA 98101

Re: EPA Region 10 (EPA) comments on the Washington Department of Transportation
(WSDOT) SR 520 Pontoon Construction Project (Project) Draft Environmental Impact
Statement (DEIS). Region 10 Project Number: 08-007-DOT

Dear Mr. Everett and Ms. Kucharski:

This review was conducted in accordance with our responsibilities under the National
Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

F-001-001 We understand that the Evergreen Point Bridge is a critical component of the Puget
Sound region's transportation infrastructure and that the SR 520 Pontoon Construction Project is
needed to shorten the time required to replace the bridge. EPA has been an active member of the
Pontoon Construction Project Agency Coordination Team (PCPACT) and we appreciate
WSDOT's responsiveness to our concerns as well as concerns by other agencies and tribes. We
are pleased by the level and degree of avoidance of impacts to aquatic resources demonstrated by
WSDOT. EPA is also a Dredged Material Management Program (DMMP) agency and we
appreciate WSDOT's substantial efforts to engage the DMMP agencies. We look forward to
continuing these collaborations.

F-001-002 Under our policies and procedures, we evaluate the environmental impact of the proposed
action and the adequacy of the impact statement. Based on our review of the DEIS, we have
assigned a rating of EC-2 (Environmental Concerns, Insufficient Information). In our detailed
comments we describe our concerns with the DEIS's conclusion that project effects would be
temporary. We also describe our concern about potential disagreement between the cities and
the State of Washington on "Shorelines of Statewide Significance" as well as concerns about
greenhouse gas emissions. Our related recommendations on cumulative effects, land use, and
climate change, address these concerns.



F-001-001

Thank you. WSDOT and FHWA look forward to further collaborations
with EPA.

F-001-002

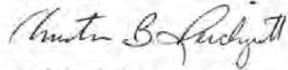
We believe that we have addressed the EPA's concerns regarding the
following issues: project effects being temporary, "Shorelines of
Statewide Significance," and greenhouse gas emissions. Please see our
responses to your detailed comments related to these issues for
reference to specific text revision in the Final EIS.

F-001-003

Our detailed comments also list mitigation measures which we believe WSDOT should consider committing to in the ROD in order to fully protect the environment. This list is not intended to represent our full perspective on the mitigation measures which will be required through the Clean Water Act Section 404 permitting process – either for wetlands mitigation or for sediment management.

Thank you for the opportunity to review and comment on this important project. If you have questions, please contact Erik Peterson of my staff at (206) 553-6382 or peterson.erik@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosures:

EPA Region 10 Detailed Comments on the WSDOT SR 520 Pontoon Construction Project DEIS
EPA Rating System for Draft Environmental Impact Statements

F-001-003

WSDOT will consider these mitigation measures. Please see WSDOT's response to the EPA's detailed list of mitigation measures located on page 4 of the EPA comment letter.

EPA REGION 10 DETAILED COMMENTS ON THE WSDOT SR 520 PONTOON CONSTRUCTION PROJECT DEIS

F-001-004 Cumulative Effects

Overall, we commend WSDOT for adequately considering cumulative effects. We especially support your discussions on how cumulative effects could be mitigated. For example, we agree that cumulative effects on fish and aquatic resources could likely be minimized through an effective "region wide cooperative interagency approach or public-private partnership" focused on substantially improving fish habitat conditions and water quality in Grays Harbor and its tributaries.

F-001-005

We are concerned, however, that defining impacts from the construction and operation of the casting facility as temporary may be insufficient and underestimate the potential significance of those impacts. First, we believe defining the Project's impacts as temporary is insufficient because continued operation of the casting facility beyond 2013 appears to be reasonably foreseeable. The secondary purpose of the Project supports this assertion. "A secondary purpose of the SR 520 Pontoon Construction Project is to ensure access to the proposed facility if it were needed to build pontoons for unforeseen WSDOT floating bridge repairs or replacements." (DEIS, 1-2) Also, the regional rareness of the proposed facility suggests that demand for construction of additional (potentially non-WSDOT) floating bridge pontoons may develop. Second, defining impacts as temporary may result in an underestimation of their potential significance. Operation of the facility beyond 2013 would contradict the DEIS's conclusion that, "Any effects related to project construction and operation would be temporary and would be eliminated when the project was finished in 2013," (DEIS, Appendix G, p. 21) Numerous similar conclusions are disclosed throughout the DEIS.

F-001-006

We recommend that the Final EIS include additional information on how the Project's effects would be temporary.

F-001-007

Land Use

We understand that both proposed sites are located within industrial zones. In addition to identifying industrial zones, the cities' comprehensive plans and critical areas ordinances, "...guide future community development so that cumulative effects on natural resources, including wildlife, can be considered (City of Hoquiam 2008a, 2009a; City of Aberdeen 2001, 2008)." (DEIS, p. 3.1-61) Because the cities' comprehensive plans and Shoreline Master Programs affect how natural resources are considered, we are concerned that the Cities and the State of Washington appear to disagree on whether the proposed build alternatives are located on "Shorelines of Statewide Significance" (DEIS, p. 3.12-6).

We recommend that the Final EIS clarify what appears to be a disagreement between the State and the cities. Please consider discussing implications for the Project's final suite of mitigation measures that could stem from identifying, or not identifying, the proposed project sites as "Shorelines of Statewide Significance".



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F-001-004

Thank you.

F-001-005

In Chapter 2, Project Alternatives, under "*How would WSDOT maintain the casting basin after pontoons for this project are built?*", the FEIS makes clear that WSDOT would maintain the facility in regulatory compliance for the duration of WSDOT's ownership, and that the facility could be used for future pontoon construction after the proposed action ends. Other potential uses of the facility are unknown at this time, so discussion of them would be speculative. The availability of the casting basin would create the precondition for impacts from future use of the facility by other projects. However, direct and indirect effects, and therefore cumulative effects, of building pontoons for the SR 520 Pontoon Construction Project would stop for most resources when the project ends.

In a few cases, however, the permanent physical presence and long-term maintenance of the facility would produce contributions to cumulative effects that would continue beyond the end of the project, and the FEIS discloses these lasting contributions. For example, Section 3.1, Ecosystems, states that the direct loss of wetlands to facility construction would be permanent, and that dewatering for facility maintenance after the project ends could adversely affect wetland hydrology on neighboring sites over the long term. These considerations are being addressed by WSDOT, the cooperating agencies, and tribes in planning compensatory wetlands mitigation, also discussed in Section 3.1.

Additionally, in Chapter 3 of the FEIS under the heading "*How did WSDOT identify other past, current, and reasonably foreseeable actions?*", we discuss the reasonably foreseeable projects considered in our cumulative effects analysis and their potential contribution to

F-001-008 Climate Change

Washington State's Departments of Ecology and Transportation are involved in substantial efforts to reduce greenhouse gas emissions (E.g., Washington Executive Order 09-05). We agree that WSDOT is, in many ways, "...leading the development of effective, measurable, and balanced reduction strategies." (DEIS, p. 3.6-9) We are unsure how the preferred alternative's estimated emissions of 238,000 MT CO₂e to the atmosphere is consistent with an overall greenhouse gas reduction strategy.

We recommend that the Final EIS include additional information on how the Project fits into the broader context of Washington's relevant climate change strategies.

F-001-009 Mitigation Measures

We believe that, in order to fully protect the environment, WSDOT should implement a maximum suite of mitigation measures. The DEIS discloses many required and potential mitigation measures for direct, indirect and cumulative effects on resources. We appreciate your differentiation between those mitigation measures that WSDOT "would" implement and those that WSDOT "could" implement. We understand that many of the measures that the DEIS lists as potential measures will be, and are being, finalized through various permitting processes. Overall, we believe that in order to achieve many of the DEIS's predicted net benefits (E.g., "...a gradual increase in surface water quality." DEIS, p. 3.4-14), WSDOT will have to commit to a suite of mitigation measures that will achieve the desired outcome.

F-001-010 Below, we list potential mitigation measures which we especially support and recommend WSDOT consider committing to in the Record of Decision.

- Commit to a full suite of air quality construction mitigation measures to avoid and minimize construction-related emissions to the extent possible.
 - See the Clean Construction USA website at <http://www.epa.gov/otaq/diesel/construction/> for many examples of construction mitigation measures, case studies, and examples of institutional arrangements for implementing this mitigation.
- Implement measures to minimize the loss or transport of contaminated sediment or debris from the dredging footprint and minimize leachate from generating and/or running off of dredged material to Grays Harbor during transport or handling of dredged sediments.
- Commit to working with boat operators to develop plans which would minimize propeller wash toward nearshore emergent wetlands.
- Utilize findings from the SR 520 Test Pile Project and the Vashon Ferry Terminal Test Pile Project to minimize impacts to fish and marine mammals from pile driving.
- Design and implement a fish-handling system at the casting basin to minimize or eliminate fish stranding or entrapment within the facility
- Remove derelict creosote-treated piles, to the greatest extent possible.
- Include the following measures in a temporary erosion and sediment control plan.
 - Install quarry spalls
 - Require regular sweeping and washing of adjacent roadways
 - Require silt fences downslope of all exposed soil
 - Construct quarry, spall-lined temporary ditches, with periodic straw bales or other sediment catchment dams



cumulative effects. Under the heading, "Proposed SR 520, I-5 to Medina: Bridge Replacement and HOV Project," we state, " This Final FEIS does not include the SR 520, I-5 to Medina: Bridge Replacement and HOV Project in its cumulative effects discussion because the bridge replacement project is physically distant from the Pontoon Construction site. WSDOT analysts assessed potential cumulative impacts from transporting the pontoons from both Grays Harbor sites and the CTC option. For all elements of the environments, the cumulative impacts from pontoon transport would be negligible."

Also, please be aware that the FEIS contains the current environmental conclusions. For this project, the discipline reports are static documents that will not be updated. In addition to the FEIS presenting the latest analysis, changes in environmental effects since publication of the Draft EIS are presented in Appendix U, Summary of Effects Technical Memorandum.

F-001-006

WSDOT considers most contributions of the SR 520 Pontoon Construction Project to cumulative effects to begin in 2011 and to end in 2014, occurring during the project construction and operation timeline discussed in FEIS Chapter 1, Introduction to the Project. However, the presence of the casting basin facility would permanently affect the project footprint, and ongoing facility maintenance, including site dewatering, could indirectly affect the hydrology of nearby wetlands over the long term, as discussed in Section 3.1, Ecosystems. As further discussed in Chapter 1 and in Chapter 2, Project Alternatives, the casting basin facility could be used by other reasonably foreseeable future actions after the Pontoon Construction Project ends. Uses of the casting basin facility, other than the potential use by the SR 520, I-5 to Medina: Bridge Replacement Project, are unknown, so discussion of them would be speculative. WSDOT evaluated the effects of reasonably foreseeable future actions in the cumulative effects analysis, as outlined

F-001-010

- Require temporary covers over soil stockpiles and exposed soil
- Construct temporary sedimentation ponds to remove solids prone to settling before discharge
- Place limits on the area exposed to runoff at any given time.
- Use construction practices that encourage efficient energy use, such as avoiding double-handling excavated soil, limiting idling equipment, and locating staging areas near work sites.
- Purchase construction materials from local suppliers to limit transportation fuel consumption.
- Requiring contractors to cover loads and to spray exposed soils with water or other suppressant to reduce dust and windblown debris
- Minimize visual effects on historic and cultural resources, public parks, and open spaces by preserving character-defining landscaping and vegetation and by designing new structures or landscapes to complement or harmonize with the existing historical or cultural buildings or landscapes.
- Continue to use the project Website, mail newsletters with information on the project, and provide contact numbers where residents could voice their concerns about the project
- Providing project materials in other languages as needed
- Providing notice to the public about increased congestion in their neighborhood caused by project construction and operation activities

F-001-011

We also recommend that the Final EIS summarize the status - as of the issuance of the Final EIS - of the whole suite of mitigation measures in one section or appendix. Please continue to differentiate between those measures that WSDOT is still considering and those that have already been committed to.

in Chapter 3 "How did WSDOT identify other past, current, and reasonably foreseeable actions?" section.

F-001-007

"Shorelines of statewide significance" is a planning designation that obligates local jurisdiction to give extra consideration to the types of land uses permitted in those designated areas. State of Washington has designated all shorelines on its western boundary as "shorelines of statewide significance," but it is up to the local shoreline master programs to ensure that these shorelines are given proper consideration during local land use planning and development. Neither project site is located on a city-designated shoreline of statewide significance because neither site meets the criteria listed for shoreline of statewide significance designation outlined in the City of Aberdeen's and the City of Hoquiam's shoreline master programs.

Section 3.12, Land Use, has been expanded to provide a more detailed discussion of the Grays Harbor Estuary Management Plan and the role of the permitting process in resolving discrepancies between the State of Washington and local jurisdictions (see Grays Harbor Estuary Management Plan under heading *What are the planned future land uses and zoning in the study area?*). The Grays Harbor Estuary Management Plan provides jurisdictional and regional linkage between the State of Washington Shoreline Management Act and the Shoreline Master Programs of the Cities of Hoquiam and Aberdeen. Where inconsistencies exist between the State of Washington and local jurisdictions, they are resolved in practice through permits issued by these agencies, including stipulations for mitigation measures.

F-001-008

The project is consistent with the Puget Sound Regional Council's regional plan, and WSDOT is participating in the state's efforts to develop GHG reduction strategies. WSDOT does not have a specific strategy to tie all of this together at this time, and has provided what it

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment, February, 1987.

can in the EIS given that the state does not currently have the information at the level EPA seeks.

The completed SR 520 Pontoon Construction Project will not result in a long-term change in Washington state's emissions and it will not increase capacity or change travel patterns. Emissions associated with casting basin construction and operation will be temporary. The agency continues to work with its partners to reduce transportation sector emissions. The existing SR 520 bridge is part of the regional transportation network and is included in the regional transportation plan. WSDOT estimated the emissions related to construction of the pontoons in this analysis because the agency feels that disclosure is an important aspect of NEPA and SEPA. The project supports key part of the region's transportation infrastructure. If the SR 520 bridge were to fail, this project enables WSDOT to be prepared with pontoons to replace the floating section of the SR 520 bridge in a timely manner. If the SR 520 bridge does not fail, WSDOT would store the pontoons until they are needed for the planned replacement of the SR 520 bridge.

F-001-009

As the EPA states in its comment, mitigation measures will and are being finalized through various permitting processes. Chapter 5 of the FEIS includes a discussion of mitigation commitments, as well as other mitigation activities that may be implemented, depending upon selection of an alternative, final design, and permit conditions. Because this is a design-build project, some permit conditions will not be known until the contractor's decisions about certain construction methods are known. Final design will not occur until after the publication of the FEIS. Many of the net benefits described in the EIS, such as the water quality example provided in EPA's comment, are based on WSDOT's commitment to comply with anticipated permit conditions (based on preliminary regulatory agency input and past experience).

F-001-010

The list of potential mitigation measures supported and recommended in the comment will be carefully reviewed and considered by WSDOT. Because this is a design-build project, the contractor is able to determine the specific mitigation measures utilized to comply with the applicable environmental laws, regulations, and permit conditions for this project. Therefore, WSDOT is not able to commit to all of the EPA's specific mitigation requests outlined in this comment at this time. Mitigation measures that WSDOT can commit to now are presented in Chapter 5, Mitigation, in the FEIS.

F-001-011

The FEIS has a mitigation measures chapter, Chapter 5, as recommended in this comment. In this chapter, WSDOT differentiates between the mitigation measures still under consideration and those that are commitments. Because this project is a design-build project, WSDOT will not be able to commit to some mitigation measures until the design-builder has a final design (and knows how they are going to comply with permit conditions or which best management practices will be used, for instance), which will be after the publication of the FEIS.

F-002-001

Thank you for your comment. WSDOT looks forward to continued coordination with the US Army Corps of Engineers.

-----Original Message-----

From: Kennedy, Jack NWS [mailto:Jack.Kennedy@usace.army.mil]

Sent: Friday, July 16, 2010 12:37 PM

To: Kucharski, Margaret

Cc: Mcandrew, Rebecca E NWS

Subject: SR 520 Pontoon Casting Basin Draft EIS

F-002-001

The Seattle District has no comments to forward on the Draft Environmental Impact Statement for the Washington State Department of Transportation's SR 520 Pontoon Casting Basin. The parts of the document we might incorporate by reference into a future permit decision document appear sufficient for the Corps' needs as we presently see them.

Jack Kennedy
Transportation Liaison Team
Seattle District, COE, Regulatory Branch
(206) 764-6905



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Environmental Services
Mottman

STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

June 24, 2010

Mr. Scott Williams
Cultural Resources Program Manager
Washington State Department of Transportation
P. O. Box 47332
Olympia, WA 98504

In future correspondence please refer to:
Log: 122107-37-FHWA
Property: SR 520, Pontoon Construction Project
Re: Receipt of DEIS

Dear Mr. Williams:

S-001-001 Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) and providing a copy of the Draft Environmental Impact Statement (DEIS). The DEIS has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

The DEIS incorrectly states that two archaeological sites exist at the Anderson & Middleton property. As we have corresponded with you previously, only one archaeological site with multiple components should be recorded at that location.

Thank you for the opportunity to review and comment.

Sincerely,

Matthew Sterner, M.A.
Transportation Archaeologist
(360) 586-3082
matthew.sterner@dahp.wa.gov



S-001-001

As correctly noted in your letter, one archaeological site has been recorded at the Anderson & Middleton Alternative. Please see the cultural resources section of this Final EIS for further discussion.

From: THOMAS, ZOANNE (DNR) [mailto:ZOANNE.THOMAS@dnr.wa.gov]
Sent: Friday, July 09, 2010 1:17 PM
To: SR 520 Pontoon Construction Project DEIS Comments
Subject: General Comments from Department of Natural Resources

Hello,

The Department of Natural Resources would like to offer the following comments on the SR520 Pontoon Project:

S-002-001

State Owned Aquatic Lands

All alternatives will utilize State-owned aquatic lands (SOAL) and must be authorized by DNR. The proposed launch channel and moorage have the potential to negatively impact critical habitat including threatened and endangered salmon spawning and rearing habitat. DNR has concerns that the proposed activities may result in the removal of excessive amounts of riparian vegetation and habitat near the shoreline, thereby increasing the potential for erosion, sedimentation and turbidity in the aquatic environment. DNR also has concerns about the long term effects of Pontoon Moorage in Grays Harbor. DNR Aquatics Program will continue to work directly with WSDOT to ensure proper use and proper authorizations on State Owned Aquatic Lands.

DNR may propose habitat stewardship measures to help reduce the environmental impacts of activities that occur in the aquatic environment including:

- Shade
- Compaction and disruption of the sediments
- The disruption of littoral movement (the natural movement of sediments)
- Underwater noise that can disrupt important species when they are most vulnerable
- The release of contamination and waste
- Anchorage type and placement for long term moorage

S-002-002

WSDOT will need to continue to coordinate with DNR to ensure any pre-construction, construction, post-construction activities, and ongoing maintenance, complies with any relevant standards for covered fish, wildlife, and aquatic vegetation located in the proposed project area.

Sincerely,

Zoanne Thomas
Rivers District Manager - Policy and Administration
Aquatic Resources Division
Washington State Department of Natural Resources (DNR)
Phone: 360-767-7005
zoanne.thomas@dnr.wa.gov
www.dnr.wa.gov

S-002-001

WSDOT has, and will continue to work directly with the DNR with respect to these issues. WSDOT anticipates that the resolution of many of these issues will be in the form of minimization measures, such as fish handling procedures, protecting shoreline vegetation, and implementing temporary erosion sedimentation control and best management practices (BMPs) during launch channel construction. It should be noted that no critical habitat for threatened or endangered salmonids will be affected by the project, because none are listed in Grays Harbor. However, impacts on salmon habitat may occur even with minimization and BMPs. Mitigation for impacts to aquatic habitat will occur at the Grass Creek mitigation site.

WSDOT will continue to work directly with DNR Aquatic Lands with respect to securing proper authorizations to moor the pontoons in Grays Harbor. Specific permitting detail is not typically discussed in the NEPA document. WSDOT acknowledges the concern and is committed to continuing to work cooperatively with DNR to resolve these concerns.

S-002-002

WSDOT has and will continue to coordinate with DNR to develop permit conditions to ensure that project construction, operation, and long-term casting basin and moorage maintenance activities, will protect resources managed by the DNR.



State of Washington
Department of Fish and Wildlife

Mailing Address: 600 Capital Way N., Olympia, WA 98501. TDD (360) 902-2207
Main Office Location: 48 Devonshire Rd., Montesano, WA 98563

July 13, 2010

SR 520 Bridge Replacement and HOV Program
Washington State Department of Transportation
600 Stewart Street, Suite 520
Seattle, WA 98101

Dear sir or madam,

Below are the official comments on the Draft Environmental Impact Statement for the Pontoon construction project located in Grays Harbor County.

S-003-001

3.1 Ecosystem

3.1-5 CTC Facility

It should be noted that the CTC Facility does contain pickweed, rock weed, salt grasses and other marine vegetation.

S-003-002

3.1-12 Mitigation

Grass Creek has been selected as the preferred mitigation site. Why was it not included in this section?

S-003-003

3.1-16 What regulatory programs protect fish and aquatic resources?

WDFW's mission statement should be changed to include all fish and shellfish life (see below).

The state Legislature gave the Department of Fish and Wildlife the responsibility of preserving, protecting, and perpetuating **all** fish and shellfish resources of the state. The "Hydraulic Code" ([Chapter 77.55 RCW](#)) requires that any person, organization, or government agency wishing to conduct any construction activity that will use, divert, obstruct, or change the bed or flow of state waters must do so under the terms of a permit (called the Hydraulic Project Approval-HPA) issued by the Washington State Department of Fish and Wildlife. State waters include all marine waters and fresh waters of the state, except those watercourses that are entirely artificial, such as irrigation ditches, canals and storm water run-off devices. WDFW's jurisdiction is not OHW or MHHW.

S-003-004

3.1-18 CTC Facility

S-003-001

Comment noted. Added the following sentence to the referenced text in the FEIS in Chapter 3.1, Ecosystems: "There is little native vegetation, though pickweed, rock weed, salt grasses, and other marine vegetation do exist, but there is no natural shoreline."

S-003-002

At the time of Draft EIS publication, WSDOT had expressed a preference for Grass Creek as a potential mitigation site. However, the agency was still investigating the suitability of Grass Creek and whether it had the capacity to accommodate mitigation sufficient to mitigate adverse effects of either build alternative and was discussing this with regulatory agencies.

Related to this, mitigation cannot be fully described until an alternative is selected, as reflected in the Record of Decision. The Draft EIS discusses possible mitigation measures for offsetting potential adverse project effects. A conceptual mitigation plan has been developed for the Preferred Alternative and is subject to regulatory agency review and approval. It is described in the Final EIS in Chapter 3.1, Ecosystems, and in Chapter 5, Mitigation. Its potential effects will be discussed in the appropriate section of that document.

S-003-003

The text has been changed to add this language to the FEIS.

S-003-004

The text has been changed to include a mention of forage fish within Commencement Bay.

S-003-004	There are forage fish in the general area surrounding the CTC Facility.
S-003-005	Exhibit 3.1-3 Channel A and B have had fish use in the past.
S-003-006	3.1-22 Aberdeen Log Yard Alternative: Channel A has fish use. It does not matter to WDFW if they are salmonids or not. WDFW protects all fish life. Channel B has also had fish use.
S-003-007	3.1-22 CFC Facility As previously stated, there is pickweed, rockweed, salt grass and other marine vegetation present.
S-003-008	3.1-22 and 23 Grays Harbor Build Alternative: Just because “forage fish spawning is not known to occur at either build alternative site” doesn’t mean they are not or have not used the area. Herring, for example, are known to spawn on piles and debris throughout Grays Harbor.
S-003-009	The WSDOT summer 2009 characterization is qualitative, not semiquantitative.
S-003-010	3.1-27 through 29 How did WSDOT evaluate direct effects on fish and aquatic resources? What about fish being killed or injured by being trapped, handled and relocated in the pontoon building basin?
S-003-011	What about effects from armoring the launch channel?
S-003-012	Installation of piles and dolphins permanently eliminate bed habitat and will need to be included in the mitigation plan.
S-003-013	There will likely be short and long term impacts to nearshore salmonids migration routes from armoring the launch channel, placing piles and dolphins, short term pontoon storage and handling.
S-003-014	3.1-31 How would pontoon-building operations directly affect fish and aquatic resources? Work windows: Operating (opening of the gate) should only occur during the work window to reduce the potential to kill or injure juvenile salmonids.
S-003-015	3.1-34 How would pontoon moorage directly affect fish and aquatic resources? If pontoons are being built for emergency replacement, wouldn’t it be better to store the pontoons closer to the current bridge site? What happens if the bridge fails and the pontoons cannot be transported to Lake Washington?

S-003-005

We have changed the text in this section, adding a sentence that acknowledges the possibility that there may be fish access to Channels A and B, and cited your letter as the source of this revision.

S-003-006

A sentence has been added to the text to note that WDFW has documented fish use at both Channel A and Channel B.

S-003-007

The text has been slightly modified to clarify that there is little native vegetation and, because the site is existing and fully built out, and it is not a natural shoreline. The FEIS text was revised in Chapter 3.1, Ecosystems, under the heading *What are the existing wetlands in the study area?* to acknowledge the presence of pickweed, rockweed, salt grass, and other marine vegetation.

S-003-008

The text has been modified to include the information regarding herring spawning throughout Grays Harbor.

S-003-009

The text has been changed to characterize the studies as qualitative, rather than semi-quantitative.

S-003-010

Fish-handling procedures within the casting basin have been added to the list, and the sentence has been modified slightly to make sure that it addresses effects to fish, aquatic resources, and their habitats.

S-003-016 | Will the area be monitored to determine what, if any, effect storage will have on bed scour and deposition patterns in Grays Harbor?

S-003-017 | 3.1-39 through 40 Avoidance and mitigation.

Has mitigation for temporal and permanent loss of habitat from anchoring systems been included in the mitigation plans?

S-003-018 | Your conclusion that no mitigation is needed for work at the existing CTC Facility does not include loss of fish life and injuries caused by operation the graving dock.

S-003-019 | BMP's should include not opening the gates during the fish window. This would avoid and minimize impacts to juvenile salmonids.

S-003-020 | Why was the Grass Creek mitigation site not included in the DEIS?

S-003-021 | 3.1-44 Wildlife

The following comments are from Jane Jenkerson, WDFW Wildlife Biologist. She should be consulted for further information. Her contact info is (360) 902-2497.

Ch. 3 Ecosystems, under Wildlife, pg. 47, there is a chart that shows federally-listed t & e species, and under marbled murrelet, a statement essentially says that there is no nesting habitat within 5 miles of the proposed project(s). **This is not correct for the Aberdeen Sorting Yard; there are 2 occupied (nesting) sites within 5 miles (actually within 3 miles) of the site, south of it.** Craig Hansen was interested only in the Aberdeen Sorting Yard. I did not look at the other proposed site, which is on Anderson & Middleton property, so didn't check its proximity to known occupied sites. Murrelet information for the below mentioned TRS' and surrounding area.

T17R09W S17 – no detections

T17R09W S2 – Presence

T17R09W S28 and S32 – Occupancy

T17R10W S11 – no detections

T17R10W S6 – Presence

S-003-022 | Chapter 5

No mention of invasive species in biofouling section.

If you have any questions, please call me at (360) 249-1224.

Sincerely,



Bill Reche
Area Habitat Biologist

S-003-011

This has been added to the bullet that calls out effects resulting from launch channel construction. The revised text reads: "Constructing the launch channel, including armoring."

S-003-012

All launch channel construction impacts, including loss of bed habitat due to piles and dolphins, is being accounted for in the proposed mitigation plan for the project.

S-003-013

WSDOT consulted extensive literature on salmonid migration in the nearshore environment. Please see the *Conceptual Aquatic and Wetland Resources Mitigation Plan for Grass Creek* for full citations and references.

Based on this discussion, WSDOT anticipates there may be minor long-term impacts to nearshore salmonid migration routes from the launch channel, placing piles, dolphins, or pontoon moorage. This text was added to the discussion in 3.1, Fish and Aquatic Resources, under the heading *How would construction of the casting basin directly affect fish and aquatic resources?* The mitigation proposed in the *Conceptual Aquatic and Wetland Resources Mitigation Report for Grass Creek* addresses all impacts (short- and long-term) anticipated to result from project construction.

S-003-014

The pontoon gates are anticipated to be opened a maximum of six times during the life of the project. Casting basin gate operations and pontoon launches will occur both during and outside the in-water work windows. WSDOT has coordinated this approach with WDFW, US Fish and Wildlife, the NMFS, and the Quinault Indian Nation. The design of the casting basin has been modified to minimize

entrapment or harm to juvenile salmonids and other fish. The project schedule is such that pontoons must be floated out upon completion. However, best management practices would be in place to avoid and minimize potential harm to juvenile salmonids and other fish.

S-003-015

Having the pontoons closer to Lake Washington at the time of a catastrophic bridge failure would not substantially reduce the amount of time needed to reopen the bridge. If the bridge should fail, repair work in addition to pontoon replacement would be required. For example, one or both transition spans carrying traffic from the column supported portion of the roadway to the floating bridge would likely need to be repaired or replaced. The anchoring system would also likely need repair or replacement. Much of this work could proceed while the pontoons are being towed from Grays Harbor to Lake Washington.

S-003-016

Based on background research and professional opinions of technical experts, WSDOT does not anticipate any effects on bed scour and deposition patterns in Grays Harbor as a result of pontoon moorage. Although some localized effect may result in the immediate vicinity of the moored pontoons, this effect is not expected to be substantial and is anticipated to be temporary in nature. Grays Harbor is very large in relation to the area that would be occupied by moored pontoons and its sediment dynamics are complex. Monitoring the bed scour and deposition patterns in Grays Harbor would require substantial resources. WSDOT does not believe that such monitoring is warranted or would represent a prudent use of taxpayer funds given the project's limited potential to cause detectable effects on the system.

S-003-017

Yes. These issues are discussed more fully in the *Conceptual Mitigation Plan for Grass Creek*.

S-003-018

The text reads: "Because the facility [CTC] is already in place and WSDOT anticipates no effects on fish and aquatic resources outside of the normal, already-permitted operation of the existing facility, WSDOT does not anticipate that any mitigation would be required, other than fish handling protocols." The presumption is that because the CTC Facility is already permitted and operating, and because WSDOT is not changing use of the facility, no additional mitigation would be required. WSDOT would be willing to upgrade the existing fish handling facilities to standard operating procedures currently approved by the regulatory agencies, if WSDOT were to use the CTC Facility.

Considering this willingness to upgrade, WSDOT respectfully disagrees with the comment. If the CTC Facility is used by WSDOT or its contractor, WSDOT would ensure that fish mortality issues, if they exist at the CTC Facility, would be minimized to the greatest degree possible by adopting the most recently approved standard operating procedures with respect to fish handling.

S-003-019

The design and construction of the casting basin facility, in combination with the newly revised fish handling protocols at the facility, are intended to avoid and minimize injury or mortality of all fish, including juvenile salmonids that may become entrapped in the casting basin during gate openings. The project schedule is such that during an emergency response (in the event that the current SR 520 bridge fails) gate openings would be scheduled as soon as possible, following pontoon construction. It may not be possible to avoid opening the gates during all fish windows. That is why the fish handling protocols have been redesigned - to avoid and minimize injury or mortality to fish to the

greatest extent possible, while still accomplishing the project purpose, which is to provide pontoons to replace the existing SR 520 bridge should catastrophic failure occur.

S-003-020

The Grass Creek site had not been finalized as the preferred site for mitigation when most of the Draft EIS was written. The Final EIS includes a summary overview of the Grass Creek site.

S-003-021

This chart has been corrected.

S-003-022

The potential for invasive species to colonize the biofouling community has been added to the text as a result of your comment. This section is now found in Chapter 6 of the Final EIS.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

July 11, 2010

Margaret Kucharski
SR 520 Project Office
600 Stewart Street, Suite 520
Seattle, WA 98101

RE: Ecology Comments on SR-520 Pontoon Construction Project DEIS

Dear Ms. Kucharski: *Margaret!*

S-004-001 The Department of Ecology (Ecology) is pleased to submit comments on the Draft Environmental Impact Statement (DEIS) for the Washington State Department of Transportation (WSDOT) SR-520 Bridge Pontoon Construction Project. As you know, Ecology has contributed suggestions and provided guidance to WSDOT on Shoreline Management Act issues, wetland impacts and mitigation, and other land use regulations related to the proposal since its earliest stages in 2006.

We would like to acknowledge that WSDOT and the project team have been exceptionally thorough and responsive throughout the Pontoon Construction Project Agency Coordination Team (PC-PACT) interagency coordination process. They have conducted detailed site and impact analyses, providing very useful and timely information - especially in response to regulatory agency requests. They have effectively addressed our many and varied concerns regarding wetland and mudflat impacts, mitigation site selection, pontoon moorage effects, and other ecosystem issues.

S-004-002 We appreciate that the DEIS acknowledges the upcoming preparation of a formal mitigation plan. In the aforementioned spirit of early coordination, WSDOT has provided early drafts of that plan to Ecology and an opportunity to comment on it. We are continuing to work with WSDOT toward a final mitigation approach for wetland and mudflat impacts that is consistent with our agency guidance and best available science.

While Ecology's primary focus and participation related to wetlands, shorelines, and water quality, other important issues relating to Environmental Justice and Social Issues are within Ecology's purview. We have included several comments on those sections in the DEIS.

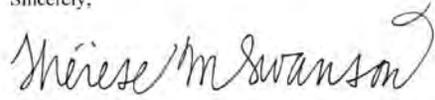
S-004-001
Thank you.

S-004-002
Thank you.

Margaret Kucharski
July 11, 2010
Page 2 of 2

S-004-002 In closing, Ecology commends the WSDOT staff and project team for a job well done! Please do not hesitate to contact me at 360.407-6789 or tswa461@ecy.wa.gov should you have any questions or concerns. You can also contact the staff person associated with particular comments – their phone numbers are in the comment sections.

Sincerely,



Therese M. Swanson
Ecology Major Transportation Project Coordinator

Enclosure

ecc: Sally Toteff, Ecology SWRO Director
Megan White, WSDOT Environmental Services Manager
Brenden McFarland, Ecology ERTS Manager
Perry Lund, Ecology SWRO
Rick Mraz, Ecology SWRO
Scott Morrison, Ecology SWRO
Dom Reale, Ecology SWRO
Millie Piazza, Ecology HQ
Bobb Nolan, Ecology MAP Team

Proposed Stormwater Treatment Facilities for Grays Harbor Build Alternatives

(Scott Morrison, ECY SWRO 360-407-6292)

- S-004-003 1. WSDOT selected each treatment facility based on space constraints and discharge location for each Grays Harbor build alternative. WSDOT engineers prepared preliminary designs of stormwater treatment facilities to estimate the maximum volumes and sizing of stormwater treatment facilities to meet the *Highway Runoff Manual* requirements for each build alternative (Exhibit 3.4-2). **Please note that the design storm for the Sand and Gravel General Permit is the 10 year – 24 hour event.**
- S-004-004 2. The DEIS states that the completed pontoons would be stored at an open-water location within Grays Harbor (see Exhibit 2-10 in Chapter 2), and that WSDOT does not expect pontoon moorage to cause substantial effects on the marine-water resources of Grays Harbor. The moorage location would be in well circulated open waters that would not likely experience any noticeable change in water quality due to the presence of moored pontoons. **Please provide the basis for this conclusion.**

Social Impacts & Environmental Justice Comments

(Millie Piazza, ECY EJ Coordinator 360-407-6771)

- S-004-005 **Chapter 3.13 Social Elements**
 - 1. p. 3.13-1: DEIS methods include a study area of “one-quarter-mile radius” around the proposed project site, and the area adjacent to the proposed truck haul routes. A ¼ mile radius is a significantly smaller study area than what is generally used in environmental justice analyses (i.e., ½ to 5 mile radii). The DEIS study design using a ¼ mile radius raises questions about the determination of “no impact.” To strengthen the validity of the DEIS conclusions, the justification for this research design should be included in the DEIS.
- S-004-006 2. p. 3.13-3: Regarding the ¼ mile radius study area: Providing text on the distances to the nearest residential areas and social landmarks could provide helpful context in understanding this study area.
- S-004-007 3. p. 3.13-3: The high percentage (29%) of Hispanic students at A.J. West Elementary school in Aberdeen indicates a possible environmental justice concern. The DEIS should provide the proximity of the school to the proposed construction site and any project construction and operation impacts on the school.
- S-004-008 4. pp. 3.13-16; 3.13-18: As Ecology previously has commented on the Pontoon Construction Project Discipline Reports, statements regarding possible benefits from jobs associated with a project are often false promises made in mitigation proposals. Low-income, minority, LEP, and EJ community residents often do not benefit from potential or promised project jobs. This report would be strengthened by specifics regarding employment opportunities, including specific measures that will be taken to train and hire

S-004-003

WSDOT will treat process water according to the requirements of the Sand and Gravel Permit.

S-004-004

WSDOT analyzed estuarine processes, such as wind, wave, sediment, and tidal exchange at the moorage site and modelled the effects of pontoon moorage on these processes. The FEIS contains a discussion of this work in Chapter 3.1, Ecosystems, under the heading "*How would pontoon moorage direct affect fish and aquatic resources?*".

S-004-005

The Social Elements study area was expanded to a radius of 0.5 mile around each of the Grays Harbor Build Alternatives and now incorporates the truck haul routes, as shown in Exhibits 3.13-1, 3.13-3, and 3.13-4. New reviews of U.S. Census block data were conducted within the study areas, and the results revised accordingly. No changes to the conclusions resulted from the study area expansion.

S-004-006

To ensure inclusion of the nearer residential areas and social landmarks, the study areas were expanded to a radius of 0.5 mile around the Grays Harbor Build Alternatives. Truck haul routes were also incorporated. Exhibit 3.13-1 shows the locations of social landmarks. Residential areas within the study area boundaries and along the truck haul routes are shown in Exhibits 3.13-3 and 3.13-4.

S-004-007

The referenced text, which is on page 3.13-10 in the Draft EIS, has been revised to include the statement that the A.J. West Elementary School is approximately 0.5 mile from the nearest edge of the Aberdeen Log Yard Alternative. Potential effects of the project on this school would be

S-004-008

local low-income, minority, or LEP persons, and to contract with minority or women-owned businesses.

S-004-009

5. p. 3.13-19: The DEIS states that the build sites in Grays Harbor “*would not result in indirect effects on minority, low-income, or other populations...*” and that increased employment may “*result in project workers' spending on nonessential items, such as dinner out or renovations to the house, which would result in more patronage at local businesses. The tax revenue from the facility owner and increased spending on taxable goods could also result in new funds for community improvement projects and services. With new job opportunities, people could move to the area to fill the positions, which could result in higher demand for housing choices. As with the potential direct effects, these indirect effects would be temporary.*”

The DEIS does not provide research to support these hypotheses about positive indirect effects. Contrary to the DEIS, environmental justice literature suggests that often the local community does not benefit from the job opportunities alluded to in project proposals because these communities often lack the training or skill sets needed. Thus, typically, an influx of labor from outside the community fills the positions which, in turn, results in a higher demand for local housing that drives up the demand and cost of rental housing. As indicated in the social impact assessment in this DEIS, the community surrounding the Grays Harbor sites have a significant percentage of renters and low-income persons. This vulnerable community may then be priced out of the housing market and potentially displaced from their community - thus exacerbating social injustice.

S-004-010

6. p. 3.13-21: The DEIS states that “*the SR 520 Pontoon Construction Project's contribution to cumulative effects on social resources would be beneficial, so mitigation to prevent negative cumulative effects is not discussed.*” The DEIS lacks sufficient evidence to support the conclusion of no negative cumulative effects, nor is there sufficient evidence to conclude beneficial effects. The validity of this conclusion is particularly challenged by the small study area (¼ mile radius). Further, demographic analyses of the proposed sites in Grays Harbor indicate significant low-income, LEP, and elderly residents living in proximity to truck haul routes. Potential impacts on the health and well-being of these communities from construction, operation, and increased truck traffic include lower air quality, noise pollution, visual and aesthetic impacts, and economic impacts from potentially declining property values.

Attachment 4 - Glossary

S-004-011

1. p. A4-5: This DEIS would be strengthened through “plain talk” editing as required by WA Executive Order 05-03. The use of simple and clear language is particularly relevant for environmental justice work. Specifically, the DEIS should simplify text such as: “*In making determinations regarding disproportionately high and adverse impacts on minority and low-income populations, mitigation and enhancements measures that would be taken and all offsetting benefits to the affected minority and low-income populations*”

related to haul route use by trucks traveling to and from the project site. These effects are disclosed in the FEIS in Chapter 3.13, Social Elements and Chapter 3.14, Transportation.

S-004-008

Kiewit-General is responsible for hiring all direct jobs, as well as securing vendors and sub-contractors. The project includes 50,000 hours of training. Fifteen percent of the total work hours of the contract must go toward apprenticeship requirements. State and federal prevailing wage requirements are also part of this contract. Kiewit-General has a Community Workforce Agreement in place with the local labor unions. They will work with unions to provide a skilled, local and diverse workforce for the project, along with training opportunities.

To ensure that minority-owned firms have an opportunity to be a part of the contracting community that builds the project, a Disadvantaged Business Enterprise (DBE) goal has been established at 6 percent (approximately \$22 million) of the total proposal price for the project.

Pontoon Construction Project Employment Goals:

- 6% DBE (federal requirement)
- 50,000 hours of training (federal requirement)
- 15% apprenticeship (state requirement)

A summary of these specifics has been added to the Social Elements section of the Final EIS to support the conclusion that environmental justice populations could benefit from the job opportunities the project would bring.

S-004-009

WSDOT's analysis is based on the prediction of a general stimulative effect on the local economy from construction and operation of a casting

S-004-011 | *may be taken into account, as well as the design, comparative impacts, and the relevant number of similar existing system elements in nonminority and non-low-income areas.* "

S-004-012 | 2. p. A4-6: The DEIS definition of Environmental Justice is limited to "human health and/or environmental effects" and should also include economic or social impacts. Ecology suggests using the US Department of Transportation and the Washington State Department of Transportation definition of Environmental Justice that includes "*human health and environmental effects, including social and economic effects.*"

S-004-013 | **Social Elements Technical Memorandum**

1. pp. 1, 30: The DEIS states that "*...the project would benefit the Grays Harbor County area by providing a new source of employment.*" As addressed in previous comments, low-income, minority, LEP, and EJ community residents often do not benefit from potential or promised project jobs.

S-004-014 | 2. pp. 7, 11: The DEIS methods include "*a one-quarter-mile radius around the site.*" As addressed in previous comments, a ¼ mile radius is a significantly smaller study area than what is generally used in environmental justice analyses (i.e., ½ to 5 mile radii) and potentially compromises the validity of the DEIS conclusions.

S-004-015 | 3. pp. 30, 32 The findings in the DEIS do not support the conclusion that "*construction would affect all populations equally.*" and that the "*project construction would not have any effects on minority and low-income populations that would be appreciably more severe or greater in magnitude than those experienced by non-minority and higher-income populations.*"

Low-income persons and communities with environmental justice concerns have additional vulnerabilities, socio-economic disparities, and living conditions that are the basis of disparate impacts from public projects. "Minority and low-income populations" may be more severely burdened by impacts because these residents may have fewer resources to mitigate the impacts of construction related effects. For example, closing windows to reduce air or noise pollution may be an undesirable and potentially dangerous option in homes without air conditioning during hot summer months, particularly for elderly persons. Low-income residents may not have access to options such as temporary relocation, alternate driving routes, home air filters, white noise machines, or access to additional health care for addressing sleep disturbances or stress from noise or respiratory impacts from reduced air quality.

S-004-016 | **Toxics Cleanup Program**
(Mr. Dom Reale 360-407-6266)

If contamination is currently known or observed during construction, sampling of the potentially contaminated media must be conducted. If contamination of soil or groundwater is readily visible, or is revealed by sampling, the Department of Ecology must be notified. Contact the Environmental Report Tracking System Coordinator at the Southwest Regional Office at (360)

basin facility at either build alternative site, as discussed in Final EIS Section 3.8, Economics. While it is possible to surmise that an unknown proportion of employment positions provided by the project would be filled by workers from outside the Grays Harbor area, and that some of these workers could displace an unknown number of low-income renters, WSDOT's analysis indicates that the project would have a net beneficial effect on the local economy and that neither of the Grays Harbor Build Alternatives would have a disproportionate adverse effect on low-income or minority populations.

S-004-010

In response to the Department of Ecology's comments relating to environmental justice, WSDOT expanded the study areas for low-income and minority populations, shown in Final EIS Exhibits 3.13-3 and 3.13-4, respectively, to a 0.5-mile distance from each Grays Harbor alternative site and from the proposed haul routes, and examined census data and other information relating to the expanded study areas.

Examination of demographic data from within the expanded study areas did not lead to a change in the conclusions presented in the Draft EIS. Also, haul route related effects would affect all populations in the area, including low-income, LEP, and elderly populations. On Draft EIS pages 3.13-19 and 3.13-20, WSDOT discusses mitigation measures to reduce direct adverse effects of the project on social elements, including low-income and minority populations. These mitigation measures are also included in the Final EIS.

With regard to cumulative effects on social elements, WSDOT discloses on Draft EIS page 3.13-21 of the Draft EIS that the probable effects of other present and reasonably foreseeable future actions in the Grays Harbor region, in combination with the proposed action, would be positive because they would help to reverse the trend of regional job losses. Because this is a beneficial cumulative effect, WSDOT is not

S-004-016 | 407-6300. For assistance and information about subsequent cleanup and to identify the type of testing that will be required contact Dom Reale.

S-004-017 | 401/402 Issues

- S-004-018 | 1. At p.2-10, it is noted that the NPDES Sand and Gravel permit is issued by Ecology, and the same is true for the NPDES Construction Stormwater permit – yet that is not noted in the paragraph above.
- S-004-019 | 2. The temporary construction dewatering system would be installed “before any excavation activities begin”, and this activity will likely be covered under the Section 401 Water Quality Certification.
- S-004-020 | 3. Is there a difference between the temporary and operational dewatering systems as far as where the water will be discharged; i.e. the temporary system will discharge into Grays Harbor, while the operational system would be discharged “into the harbor or an approved offsite facility.” (P.2-11) Also, at p. 2-33, under Wastewater Treatment, it states that the water will go either to Grays Harbor or to the “local wastewater treatment plant.”
- S-004-020 | 4. At p.2-30: WSDOT anticipates that routine monitoring and maintenance would be required to ensure that these systems continue to function properly...” **The 401 likely will cover this.**

Miscellaneous

- S-004-021 | 1. It will enhance the FEIS to include an updated schedule, especially one that includes steps such as filing permit applications and securing permits. (See p. 5-6)
- S-004-022 | 2. While the information is in various sections in the DEIS, an upfront, clear statement about the project’s purpose should be included– i.e. to build 33 pontoons to prepare for an emergency – and another acknowledging the high likelihood that once the 33 pontoons are built the site will continue to be used to build the additional pontoons needed for the SR-520 Bridge Replacement project.

The DEIS does note that the project it evaluates **does not** include the construction of additional pontoons needed beyond replacing the existing bridge’s current capacity and that the site “**could be used** for constructing the additional pontoons”. However, it is somewhat puzzling why the DEIS repeatedly stresses the point - that this project is SOLELY to build “emergency” pontoons – and leaves to speculation whether WSDOT will use the site to build additional pontoons. The Pontoon project is part of the larger SR-520 Bridge Replacement & HOV project, and that project’s purpose is to replace the bridge, regardless of a catastrophe – so why not be clear about the expected outcome. It can be argued that the majority of the public believes that the pontoon project is to build pontoons for the floating bridge, period. The somewhat conflicting statements in the DEIS may create confusion.

Further, the project timeline for the SR-520 Bridge Replacement project will overlap that of the Pontoon project, thus making it unlikely that there would be a gap in construction. Therefore, the possibility that WSDOT will use the Grays Harbor site for additional pontoons is not as speculative or uncertain as the DEIS explains.

required to discuss potential mitigation. (Please see "Guidance on Preparing Cumulative Impact Analyses," WSDOT, February 2008, Step 8, Assess the Need for Mitigation.)

WSDOT's mitigation of direct and indirect effects minimizes the contribution of its projects to cumulative effects, but WSDOT cannot mitigate contributions to cumulative effects by others beyond its jurisdiction.

S-004-011

The Draft EIS has been written and edited with a focus on reader-friendly "plain talk." We agree the particular quote noted in the comment is definitely not plain talk, but it is a direct quote; therefore, we could not edit. Since the quote is providing more information than is required to define the glossary term, the quote has been deleted.

S-004-012

The Final EIS glossary has been revised to include references to "economic and social effects," as suggested by this comment.

S-004-013

Comment noted. Please see the responses to the previous comments on this topic.

S-004-014

As shown in Exhibits 3.13-1, 3.13-3, and 3.13-4 of the Final EIS, the Social Elements study area has been expanded to a radius of 0.5 mile around each of the Grays Harbor Build Alternatives and to incorporate the truck haul routes. The text in Section 3.13 has been revised to present the expanded study area and the results of updated analysis.

- S-004-023 | 3. Under *Long-Term Maintenance*, the first sentence implies that all project pontoons will be towed out of the basin for storage, yet the language above this section states that the last eight will be stored in the basin until needed. **Please clarify.**
- S-004-024 | 4. At pp.2-15 and 2-33 re: *Cofferdams* - the discussion at p.2-15- might best be at p.2-33 to avoid confusion. The earlier description goes into some detail about the BMP, only to later read that the DB Contractor is unlikely to use them.
- S-004-025 | 5. Chapter 5 – "*Preferred Alternative*" – the note that the Aberdeen Log Yard site is the preferred alternative should appear at the beginning of the document. While waiting until the last chapter may appear "objective," i.e. the analysis of the previous chapters seems more balanced; delaying the "conclusion" could create confusion for the reader. (It is noted that the preferred alternative is mentioned in the FACT sheet at the front of the document but the comment here suggests announcing it early in the *Introduction* as well.)
- S-004-026 | 6. At p.5-23: it would benefit WSDOT to elucidate the point that it has ensured objectivity when evaluating the two site alternatives. The statement is made, and one example is given: the Design-Builder is not held to the ALY site, but it makes sense to provide more examples of this objective evaluation. (In 5. above, the comment speculates as to the reason why the preferred alternative is not mentioned until later.)
- S-004-027 | 7. At pp.5-4 to 5-5, is "effects" another term for "costs," as in do the "proposed project's long-term benefits warrant the short-term effects" and "tradeoffs between short-term effects and uses of resources and the long-term benefits?" **Definitions are needed for "short-term effects" and "long-term benefits."**
- S-004-031 | • Some short-term effects (costs?) are "new jobs and increased sales" and they are listed along with negative impacts from the project. It is unclear what is being measured and compared to long-term benefits. The word "tradeoffs" implies that a comparison is needed between the costs of the short-term effects vs. the benefits that the project provides in the long-term.
- S-004-028 | • P. 5-5 states that short-term includes the time it would take to build the additional pontoons needed for the I-5 to Medina project and the long-term is the time beyond the foreseeable need for the site for the SR-520 pontoons. Yet, if short-term includes building the pontoons, then the phrase later on: "The primary long-term benefit...is that WSDOT would build pontoons..." should be rephrased for clarity and consistency. The project's long-term benefit is that all pontoons will be built for the bridge in less time than they would without the project.
- S-004-029 | 8. At p.5-7, the statement is made that without this project, construction of new pontoons would be carried out under an emergency action..." However, the DEIS should recognize that if there is no emergency, pontoons still will be needed for replacing the SR-520 Bridge under the preferred alternative (A+) - the difference is that none would be built on an "expedited" schedule.

S-004-015

The Social Elements analysis discloses and describes the effects of project construction and operation on the basis of available factual information. It does not speculate with regard to potential behavioral responses or the abilities of population groups to respond to the project in various ways.

S-004-016

Comment noted. WSDOT will coordinate with the Department of Ecology throughout the construction and operation of the proposed casting basin facility and comply with all hazardous materials sampling, testing, handling, and disposal requirements.

S-004-017

Thank you for your comment. This has been corrected in the corresponding section of this Final EIS.

S-004-018

Comment noted. As stated on DEIS page 2-10, "WSDOT would install a construction dewatering system before any excavation activities begin." WSDOT acknowledges that this activity would likely be covered under the Section 401 Water Quality Certification.

S-004-019

The construction dewatering and the operation dewatering systems can go to the same locations or different depending on how the site development activities progress. Both can be infiltrated onsite and/or discharged to the harbor.

There is a difference between the groundwater dewatering system and the operational process water treatment system. The operational process water can be handled in several ways. The process water can

S-004-030

9. Another point is that the actual time needed to build the pontoons – emergency or otherwise – is the same amount of time. The time reduction comes in because the pontoon building can start earlier, but the pontoons won't be built any faster. Again, the bridge replacement project will need pontoons, regardless of an emergency, thus it is certain that they would be built somewhere, taking the same amount of time to build (assuming a similar configuration to the casting basin for the current project). Building the additional pontoons needed for the SR-520 Bridge Replacement project (i.e. beyond the initial 33) needs to be more fully acknowledged in this DEIS, rather than a speculative statement here and there. The benefits of this “expedited” Pontoon Construction Project cannot be fully described and compared without describing the “additional pontoon project” in more detail.

Ecology strongly suggests that this entire section be reworked to provide credibility, clarity, and consistency.

be handled by the design-builder independently on site and discharged into the launch channel or processed in batches and sent to the wastewater treatment plant. Each discharge will depend on available capacity, treatment needs, cost of treatment, etc. The Aberdeen Log Yard Alternative has the treatment plant right next door with an available capacity (barring a storm event) and has indicated a willingness to accept some of the process water.

S-004-020

Thank you. We have revised the referenced text to note that the Section 401 Permit would likely cover monitoring and maintenance of the pontoon casting basin stormwater dewatering systems.

S-004-021

The Final EIS includes an updated schedule that includes securing permits.

S-004-022

The project's purpose and need is stated very early in Chapter 1 of the Draft EIS and Final EIS. The signing agency for this EIS, the Federal Highway Administration, approved the purpose and need statement as written.

At this time, it is still unknown where the balance of pontoons needed for the planned SR 520, I-5 to Medina: Bridge Replacement and HOV Project would be built. Several sites are now under consideration and many factors are being analyzed, including potential environmental impacts at those sites. Selection of that site is a separate action from this project.

The possibility of building pontoons for the planned bridge replacement is mentioned several places throughout the Final EIS, where appropriate,

to comply with NEPA disclosure requirements.

Because the timeline for the planned bridge replacement would overlap with the SR 520 Pontoon Construction Project, WSDOT would likely need to build pontoons at another location.

S-004-023

All pontoons will be towed out of the casting basin and moored in the identified pontoon moorage area in Grays Harbor until needed.

References to storing the pontoons in the basin have been removed from the Final EIS.

S-004-024

Cofferdams will not be used on this project. Reference to the use of cofferdams has been removed from the Final EIS.

S-004-025

WSDOT introduces the preferred alternative much earlier in this Final EIS, while maintaining an objective analysis and comparison of all three alternatives considered.

S-004-026

Per SAFETEA-LU (23 CFR 636), the design-builder has not been involved in nor biased the NEPA process, and effects associated all alternatives were analyzed equally in the FEIS. Text was added to this section to clarify this.

Specifically, the section entitled "Did all the alternatives receive the same level of analysis?" has moved up to Chapter 2. As noted in the Final EIS text in this section, SAFETEA-LU does allow the preferred alternative to be developed to a higher level of detail than the other alternatives being considered, although another alternative could be selected at the end of

the NEPA process.

As far as examples of objective evaluation of all alternatives, every section in chapter 3 breaks down the analysis of effects by alternative and gives them equal weight. If effects would be the same, the effects analysis for the build alternatives is condensed under a "Grays Harbor Build Alternatives" subheading.

As noted in the response for the prior Ecology comment #5, the Final EIS discusses the selection of the Aberdeen Log Yard Alternative as the preferred alternative much earlier in the document now, in Chapter 2, Project Alternatives.

S-004-027

Sidebar definitions of short-term effects and long-term benefits have been added to Chapter 6, Other Considerations and Next Steps, under the question, *What would be the relationship between the project's short-term effects and long-term benefits?*.

S-004-028

The sentence referenced in the comment has been revised to more succinctly and directly state that the primary long-term project benefit is that WSDOT could replace the Evergreen Point Bridge in less time than it would take without the SR 520 Pontoon Construction Project.

S-004-029

The text in question has been revised to clarify that there are two possible scenarios for constructing pontoons without the SR 520 Pontoon Construction Project: (1) as an emergency action if there were a catastrophic failure of the bridge and (2) as a non-emergency action for the planned bridge replacement.

S-004-030

Yes, it would take the same amount of time to build pontoons, regardless of whether they are built as part of the SR 520 Bridge Replacement and HOV Program's Pontoon Construction Project, an emergency action related to catastrophic bridge failure (which assumes that no pontoons are built under the proposed action), or as part of the program's I-5 to Medina: Bridge Replacement and HOV Project. The FEIS language does not state that pontoons would be built faster, just completed and available sooner. Having enough pontoons (33) to replace the existing capacity of the bridge available at an earlier date is advantageous in the event of catastrophic bridge failure to expeditiously reestablish mobility across the lake.

The Sr 520, I-5 to Medina: Bridge Replacement and HOV Project is evaluating alternatives that would require the construction of additional pontoons, beyond those required to replace the existing capacity of the bridge. The FEIS acknowledges that it is possible that the additional SR 520, I-5 to Medina: Bridge Replacement and HOV Project pontoons may be built at the Grays Harbor casting facility, but it is not known at this time with any certainty where those pontoons will be built.

WSDOT respectfully disagrees with the statement that "the benefits of this 'expedited' Pontoon Construction Project cannot be fully described and compared without describing the 'additional pontoon project' in more detail." The benefits of the SR 520 Pontoon Construction Project are clearly stated: pontoons would be available to rebuild the bridge in its current configuration should the bridge be subject to catastrophic failure. This benefit is completely separate from the need to build pontoons to build a new bridge in a different configuration.

S-004-031

We have provided definitions of short-term effects and long-term benefits in sidebars on this page to clarify readers' understanding of

these terms. Short-term effects can be both beneficial, such as a temporary (short-term) increase in jobs, or negative, such as a temporary increase in noise from project construction activities.

We have also revised the text in question to eliminate reference to "tradeoffs." As now noted in the text, this section compares short-term effects to the long-term benefits of the project.

**CITY OF HOQUIAM DEIS COMMENTS
WSDOT SR 520 POTOON CONSTRUCTION PROJECT
JULY 12, 2010**

The following comments are submitted to WSDOT by the City of Hoquiam acting as a Participating Agency in the SR 520 Project environmental review process. No comment form was provided for the DEIS therefore comments made by the City will reference page number using the DEIS dated May 6, 2010 as distributed to the City.

- L-001-001** | Page 1-12 – Is the 2nd paragraph intended to reference the Aberdeen Site or both of the Grays Harbor sites?
- L-001-002** | Page 1-12 – In the last section the first bullet references traffic and access; access to what?
- L-001-003** | Page 1-13 – At the top of the page a bullet should be added to potential project effects on environmental elements.
- L-001-004** | Page 1-13 – Under Participating Agencies and Tribal concerns fourth bullet item; can the portion of the A&M site containing fish traps be avoided if the A&M site were to be used?
- L-001-005** | Page 1-14 – Last sentence in first paragraph; not certain what "controlled archaeological excavations (data recovery) means or how it is accomplished.
- L-001-006** | Page 2-2 – In the third paragraph it is noted that some potential future uses of the Grays Harbor site will be evaluated in a different project EIS process. Don't all known possible uses of the subject site(s) need to be evaluated in this EIS to look at cumulative environmental effects? See cumulative effects definition on page 3-3 of this DEIS.
- L-001-007** | Page 2-4 – Under Aberdeen Log Yard alternative it notes that the Aberdeen site is "near" the mouth of the Chehalis River and sites Exhibit 2-1; Exhibit 2-1 does not show the location of the mouth of the Chehalis River it is substantially east of the location depicted. Either the map or the reference thereto should be amended to properly depict the transition area between the river mouth and the Harbor.
- L-001-008** | Page 2-5 – In the 2nd paragraph it states that after WSDOT internal review of the selected design-builder project approach it was determined by WSDOT that the design-builder approach would not "generate greater or different environmental effects" than the features of the WSDOT preliminary design therefore in WSDOT's opinion their "preliminary design – accommodates for all potential effects that could occur with the design-builders concept." Shouldn't that be an

L-001-001

The referenced paragraph is intended to refer to either build alternative site. The text has been revised to clarify this purpose.

L-001-002

By access, we are referring to access to trip destinations, which could include roadways, driveways, sidewalks, or other paths typically used to reach a particular destination.

L-001-003

This section has been revised and is now contained in Chapter 7, Public Input on the Draft EIS. The focus in the Final EIS is on the specific comments received on the Draft EIS by the general public, agencies, and tribes.

L-001-004

The fish trap components discovered on the Anderson & Middleton Alternative are generally long linear features consisting mostly of several parallel rows of stakes scattered across a large area. The property was investigated systematically by excavating trenches laid out in a grid pattern. Once fish trap features were identified in one trench, the adjacent trenches were not excavated to the same depth so as not to cause damage to any remaining buried portion of the feature. In short, the full extent of the fish trap features was not delineated, but it is likely that such features are present at other locations and may extend across the site. Given the size of the proposed casting basin and the depth of excavation that would be required to construct it, there would be a high probability of encountering further fish trap features on other parts of the property. The project could not be redesigned to avoid any potential fish traps on the property.

- L-001-008 | independent evaluation by the participating and resource agencies? Shouldn't the EIS be evaluating the actual proposed project to be built no matter the concept differences?
- L-001-009 | Page 2-6 – Exhibit 2-3 the square footage numbers for water treatment area and access roads should be checked and verified.
- L-001-010 | Page 2-8 – Are the differences of the municipal codes defined anywhere in the DEIS, if not they should be.
- L-001-011 | Page 2-8 – In the forth paragraph it states that the state harbor line will have to be relocated for either Grays Harbor project site. What is the process, timeline and likely outcome of such a proposal? Since it has been determined to be a requirement for either site has the formal process been started to change the harbor line; and if not why not? If it is to be relocated has WSDOT determined where it should be relocated to? If the request for relocation is not approved what is the alternative?
- L-001-012 | Page 2-8 – Under support facilities it is noted that WSDOT assumes that a batch plant will be located "onsite"; however WSDOT may ultimately decide to use an offsite concrete provider. Does the project traffic analysis account for the offsite option? In the event an offsite provider is used the traffic analysis must address both the additional traffic from the provider site to the project site as well as the traffic associated with raw materials delivery of the raw products from the suppliers to the provider's site for this project.
- L-001-013 | Page 2-16 – Exhibit 2-10 – Are the quantities of materials being excavated at each site properly reflected in the estimated project truck trips? Where will excavated material go?
- L-001-014 | Page 2-33 – The section defining "Laydown Areas" suggests that compacted gravel surfaces for roads and laydown area do not constitute impervious surface. That would appear to be an incorrect assumption as stormwater management standards classify compacted gravel surfaces as impervious for purposes of calculating runoff.
- L-001-015 | Page 2-33 – The section defining "Wastewater Treatment" suggests that some process water maybe treated and discharged to Grays Harbor. Won't all process water need to.

receive full treatment in an approved treatment plant (City wastewater system) prior to discharge?
- L-001-016 | Page 2-34 – Under "Next Steps" it is indicated that the design-builder project approach will not be evaluated until the FEIS is prepared. Since the design-

L-001-005

Controlled archaeological excavations in this context refers to excavating with the goal of recovering any information that buried features or artifacts could provide related to past human activity in the area. This type of excavation could be accomplished in a variety of ways with trained archaeologists directing the work.

L-001-006

Should one of the build alternatives be selected, there would be many options for the future use of the casting basin and support facilities, including potential future use by WSDOT for other projects. A decision on the fate of the property beyond the SR 520 Pontoon Construction Project will be made at a later time. WSDOT has identified two potential points in time when it is reasonable to assume that a decision about the future use of the casting basin facility could be made: (1) at the completion of the SR 520 Pontoon Construction Project, and (2) if the decision is made to use the facility to build pontoons for the proposed SR 520, I-5 to Medina: Bridge Replacement and HOV Project, at the end of pontoon construction for that project. Please see Chapter 1 of the FEIS under the heading *What would happen to the pontoon construction facility when the project is completed?* for more information on this topic.

The availability of the casting basin would create the precondition for impacts from future use of the facility by other projects, including the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. In Chapter 3 of the FEIS under the heading *How did WSDOT identify other past, current, and reasonably foreseeable actions?*, we discuss the reasonably foreseeable projects considered in our cumulative effects analysis and their potential contribution to cumulative effects. The SR 520, I-5 to Medina: Bridge Replacement and HOV Project is among these projects because its potential use of the casting basin facility is foreseeable.

- L-001-016** | builder project approach has been known shouldn't it be fully evaluated in this DEIS? This could be a major change to the Wastewater Treatment facility.
- L-001-017** | Page 3-5 – Exhibit 3-1 – The Exhibit should reflect modifications and potential reuse of the City of Hoquiam's Wastewater treatment lagoon located near Port Terminal 3 in West Hoquiam. Approximately 20 acres of the lagoon will be emptied of sludge and backfilled (currently under contract) for reuse as a potential industrial site.
- L-001-018** | Page 3-5 – Exhibit 3-1 – Item 4 of the Exhibit "Waterfront Development Rezone" notes "unknown". The Exhibit should reflect that the City of Hoquiam is currently finalizing a new Zoning Code for the City that establishes a new "Waterfront Overlay District" (HMC 10.04.032) that defines specific allowed and prohibited land uses within that District. The new City Code is scheduled to be adopted in August of 2010.
- L-001-019** | Page 3.1-19 – Under "Federal- or State-Listed or Protected Aquatics Species or Habitat" it is acknowledged that both alternative Grays Harbor sites are within the green sturgeon-designated critical habitat, however no distinction is provided relative to the comparative impacts of the sites. Based on analysis elsewhere in the DEIS it would appear, and should be highlighted, that the Aberdeen site has far more potential impact on the aquatic species in the area due to the length of the launch channel and excavation related thereto.
- L-001-020** | Pages 3.1-22 - In the Anderson Middleton description does the approximate 2,700 linear feet of marine shoreline include that westerly portion of the site that will remain undeveloped? It would appear that a more fair and accurate description would be to identify that portion of marine shoreline affected by each of the sites development.
- L-001-021** | Page 3.1-27 - The first sentence of the page references "approximately 30% of the historic Grays Harbor Estuary has been lost (NRC 1996)." Our recollection of discussions during a PCPACT meeting was that Ecology representatives placed the percentage of loss at up to approximately 80%. The percentage of loss should be verified for the FEIS.
- L-001-022** | Page 3.1-27 - In the section describing WSDOT activities associated with evaluating direct affects on fish and aquatic resources; particularly as it relates to pontoon moorage in Grays Harbor; did WSDOT consult with oyster growers and/or DNR regarding long-term concerns of the migration of Whitcomb Flats in the general area of proposed site?
- L-001-023** | Page 3.1-38 Exhibit 3.1-4 certainly provides persuasive argument to support the Anderson Middleton site as the preferred project alternative.

L-001-007

The sentence has been revised to remove reference to the mouth of the river. The referenced text is meant to give a general description of the area in which the Aberdeen Log Yard Alternative is located.

L-001-008

It is the responsibility of WSDOT and FHWA, the two lead agencies, to evaluate the project and to describe its potential effects. Because of this responsibility, WSDOT did not seek an independent evaluation of the designer's concept from participating and resource agencies. However, WSDOT did work with technical experts from multiple agencies, the consulting team, and internal staff to perform the analysis of how the contractor's design approach compared to WSDOT's preliminary design. In addition, below is some background to this process and the relationship between co-lead agencies.

The National Environmental Policy Act requires federal agencies to evaluate their projects and anticipate effects on the environment to inform decision makers of the project's potential effects and to disclose those potential effects to the public. Frequently, as in this case, a state transportation agency may act as a co-lead agency with the FHWA and prepare an EIS for joint federal and state funded transportation projects. Section 6002 of the Safe, Accountable, Flexible, Efficient, Transportation Equity Act, A Legacy for Users provides for coordination with other agencies to ensure their participation in the scoping process, offer them an opportunity to provide early input on the project purpose and need statement, range of alternatives to be evaluated, and methodologies for evaluating the project. It is always the lead/co-lead agency's responsibility to evaluate the project and describe its potential effects.

Yes, the EIS evaluates what is actually being proposed to be built. The Draft EIS presents WSDOT's preliminary design and the designer's concept, and it also summarizes for the reader that the two designs

L-001-024	Page 2.1-42 – In the section “How could cumulative effects on fish and aquatic resources be mitigated” the term “derelict fishing gear” and related methods of removal should be better defined.
L-001-025	Page 3.1-51 - Under the “Anderson Middleton Alternative” the western portion of the site is described as 19 acres of “the best wildlife habitat on the site” but does not specify whether or not it is within the proposed project development area or not. This section as well as previous sections in the DEIS leave the reader with the impression that the 19 acres is within the proposed area of development. In describing the Anderson Middleton site throughout the document should be consistent with the site description for the Anderson Middleton site on page 3.1-53 wherein it is clearly defined that the westerly 40 acres area will remain vegetated and undisturbed land.
L-001-026	Page 3.1-53 – See comment above for page 3.1-51.
L-001-027	Page 3.1-58 – the narrative for “How would the build alternatives compare in their effects on wildlife” as well as the Exhibit 3.1-7 on page 3.1-59 and the statement on page 3.1-60 “In addition, site design at the Anderson Middleton site would allow WSDOT to <u>avoid</u> (emphasis added) the most highly functioning wildlife habitats at the site”; <u>all certainly provides persuasive argument to support the Anderson Middleton site as the preferred alternative.</u>
L-001-028	Page 3.10-4 – In the side bar “ What are the applicable noise regulations?” the reference to the City of Hoquiam limits of construction hours as it would relate to this project is in error and should be removed as was noted in the review of the discipline reports relating to noise some months ago. The referenced code in the side bar, <u>Chapter 3A.30.0108(1)(d)(i) of the HMC</u> , simply <u>does not apply to the subject site</u>
L-001-029	Page 3.10-6 – “Under how would construction of the casting basin directly affect noise levels?” The reference to City of Hoquiam limits on construction hours needs to be removed; see comment above for page 3.10-4 regarding the Hoquiam Municipal Code. No noise variance from the City will be required for WSDOT on the subject project.
L-001-030	Page 3.11-3 – Where it states that the Washington State Patrol (WSP) enforces traffic laws in unincorporated Grays Harbor County it should note that WSP <u>and the Grays Harbor County Sheriff</u> enforce traffic laws in unincorporated Grays Harbor County.
L-001-031	Page 3.11 – 6 – Exhibit 3.11-4 notes under the Anderson Middleton site that “a lengthy haul route through town might provide a greater opportunity for accidents.” This statement appears to assume that all source materials for the project, construction and operation, will come by truck from east of Aberdeen. Has it been determined that all materials coming to the site will come by truck

would not have greater or different environmental effects. The environmental analysis applies to both designs. WSDOT determined that it was important to disclose in the Draft EIS both the agency’s preliminary design and the designer’s preliminary concept because they were developed at the same time that the Draft EIS was being written. In the Final EIS, one preferred alternative design is presented and analyzed. The Final EIS preferred alternative reflects how design details continued to evolve.

L-001-009

These numbers have been checked and revised based on refinements to the project design concept since the Draft EIS was released.

L-001-010

Differences in codes and regulations are discussed in each section in Chapter 3, The Environment, as they relate to each element of the environment and apply to either build alternative.

L-001-011

WSDOT has continued to coordinate with the Washington Department of Natural Resources (DNR). DNR has stated in more recent conversations that it will not be necessary for WSDOT to request a change to the harbor line to accommodate the construction of the launch channel. This discussion has been removed from the Final EIS.

L-001-012

The traffic analysis assumes that a batch plant will be located onsite, and an onsite batch plant is in the contractor's design. However, it is expected that use of an offsite batch plant would result in similar traffic effects because with either scenario aggregate to make concrete or concrete itself would be trucked to the project site, and WSDOT expects that the number of truck trips would be similar. If an offsite batch plant

- L-001-031** | versus rail or barge? Have all the material sources for the project, construction and operation, been determined? If so those issues should be defined and disclosed within this DEIS.
- L-001-032** | Page 3.12-4 Under Comprehensive Plans and Zoning Ordinances it should be noted as described in comments for Page 3-5 the City of Hoquiam is in the process of adopting a new Zoning Code for the City that establishes a new Waterfront Development District that includes the Anderson Middleton site. The proposed project that is the subject of this DEIS is a permitted use within the Development District.
- L-001-033** | Page 3.12-6 Even though specific comments were made for the Land Use Discipline Report several months ago this DEIS continues to ignore the existence of the Grays Harbor Estuary Management Plan (GHEMP). GHEMP is a multi jurisdictional plan that covers the entire Grays Harbor Estuary including all associated shorelands in Aberdeen and Hoquiam as well as the proposed pontoon moorage site as regulated by Grays Harbor County. The provisions of GHEMP as adopted are relevant and applicable to project sites and the moorage site in Grays Harbor. Grays Harbor and the cities of Aberdeen and Hoquiam have adopted GHEMP in addition to their individual Shorelines Master Programs as well as their recently adopted individual Critical Areas Codes. The Shoreline Master Programs section of the DEIS must include and analyze potential project impacts relating to GHEMP and the individually adopted Critical Areas Codes to represent a proper and complete analysis.
- L-001-034** | Page 3.12-10 – In the third paragraph of text WSDOT acknowledges the fact that acquisition of the Aberdeen log yard site is within the Port of Grays Harbor's Master Plan and that the Port desires the site to expand their shoreline development and economic development operations. The City of Hoquiam fully supports the Port's proposed expansion to the Aberdeen Log Yard site and recognizes the use of the property to be strategic and critical to the Port's abilities to efficiently expand. The City assumes that the Port identified the site as being strategic to future operations and the City is unaware of any other similar properties that would be available to the Port for that purpose. If the Aberdeen Log Yard becomes the Pontoon Project site it will cause the loss of potential economic development to the Port in the future.
- L-001-035** | Page 3.31-15 - Under the Aberdeen Log Yard Alternative the statement that "At this site, however, most noise sensitive properties are somewhat shielded from the site by existing commercial and industrial structures. As a result....." This does not seem logical, cumulative noise levels in the area of the site will be greater than existing conditions.
- L-001-036** | Page 3.13-17 – Exhibit 3.13-5 As it relates to the Aberdeen Log Yard Site should be amended for casting basin construction to recognize that the construction

were used it could cause greater traffic effects if it was located farther away from the site than where WSDOT anticipates getting the aggregate for use in the onsite batch plant.

L-001-013

Yes. However, since publication of the Draft EIS, excavation quantity and truck trip estimates have been revised to reflect design updates for both build alternatives. The Final EIS presents these revised estimates. The contractor proposes to stockpile much of the excavated material onsite. The final decision regarding the destination(s) of the rest of excavated material will be made after publication of the Final EIS. A map of potential disposal sites in the area is included in the Final EIS Section 3.2, Geology and Soils.

L-001-014

This section has been removed and incorporated into the description of alternatives earlier in Chapter 2. The phrase that implies compacted gravel surfaces are not impervious has been deleted.

L-001-015

Yes, all process water will be treated in compliance with existing regulatory requirements, specifically the NPDES Sand and Gravel Permit, before being discharged. Please see the Final EIS, Chapter 2, under the heading "Stormwater and Water Treatment" for this discussion.

L-001-016

The design-build approach was known conceptually when the Draft EIS was in final preparation. The release of the Draft EIS was postponed so that the design-build approach could be assessed and described in the document. As described in Chapter 2 of the Draft EIS, the design-build approach is simply a variation or refinement of the design on which the

- L-001-036** | truck traffic will pass through several blocks of residential (sensitive receptors) area before entering the Port area.
- L-001-037** | Page 3.14 – 1- Under "Transportation" for a general comment please refer to comments made for page 3.11 – 6 in this document regarding projected modes of transport for the Grays Harbor build alternatives.
- L-001-038** | Page 3.14 - 4 – Under the Anderson Middleton Alternative in the last paragraph where are the bicycling opportunities on roads around the airport and on the SR 109 spur connecting to US101? How do these opportunities differ from roads around the Aberdeen Log Yard site?
- L-001-039** | Page 3.14-6 – Under Grays Harbor Build Alternatives the statement in the second paragraph regarding the additional truck trips (19,200) for the Aberdeen site versus the Hoquiam certainly seem to support the Anderson Middleton site as the preferred alternative.
- L-001-040** | Page 3.14-9 – Under Haul Route Distance the second paragraph notes several haul road distances for each Grays Harbor build alternative. Have alternative disposal sites been identified? Have material sources been identified? If so shouldn't those locations be disclosed in the DEIS? There are predictions that some soil is contaminated at either build alternative site; has transportation, remediation and disposal been given consideration in the number of estimated truck trips required?
- L-001-041** | Page 3.14-9 – Under "How would construction of the casting basin directly affect transportation" – The analysis does not appear to address potential conflicts with railroad mainline and spur line crossings on the haul routes. The rail system is currently fairly stressed due to at grade crossings and the need for rail car storage along portions of the haul routes; this problem is only expected to worsen in the future with projected rail demand for the area.
- L-001-042** | Page 3.14 -13 – Under the Anderson Middleton site description at least one of the materials disposal sites (the City sewer lagoon being reclaimed for reuse near Port Terminal 3) has not been identified but is a short distance west of the Anderson Middleton site with the haul route traversing industrial property between the sites. Use of this disposal site could reduce overall mileage and time impacts for the Anderson Middleton site.
- L-001-043** | Page 3.14-17 - Under "What mitigation measures does WSDOT propose to reduce direct effects on transportation?" In the third paragraph it notes that roads used for haul routes "could" be assessed... It would seem that a more formal proposal and plan should be developed. The DEIS should commit WSDOT to develop and implement specific road use plans with each affected jurisdiction prior to the commencement of the haul once final decisions have been made regarding haul routes and modes of transport (i.e. road, train barge).

effects analysis was based. It is a natural progression of a project for design to be known conceptually when the Draft EIS is being composed and refined in parallel with the environmental review process, with updates to project elements and potential project effects described in the Final EIS. The design-build approach described the same type of pontoon construction facility as evaluated in the Draft EIS, with variations to some elements that are not anticipated to result in substantial impacts that were not previously described or substantial impacts that are substantially greater in magnitude. The potential project effects described in this Final EIS account for all design refinements made to both build alternatives. WSDOT will continue to advance design on the preferred alternative as allowed under SAFETEA-LU but no final design will occur before an alternative is selected and a Record of Decision is signed.

L-001-017

The Wastewater Treatment Plant project has been added to the exhibit.

L-001-018

The exhibit has been updated to include the City of Hoquiam's "Waterfront Overlay District" zoning effort.

L-001-019

WSDOT's research indicates that the difference in green sturgeon effects between the two sites is insubstantial. The FEIS includes a discussion of this conclusion in Chapter 3.1, Ecosystems, under the heading *How would construction of the casting basin directly affect fish and aquatic resources?*

- L-001-044 | Page 3.15 -5 – Under “Viewshed” the description continues to ignore the Aberdeen Highlands and Bel Aire areas of Aberdeen even. The hill areas of Aberdeen have the same or very similar views of the Grays Harbor Estuary as does the Beacon Hill area of Hoquiam. The Aberdeen Log Yard site is much more visible from the hill areas in Aberdeen as apposed to Beacon Hill. This information should be added to the description for viewshed.
- L-001-045 | Page 3.2-6 – Exhibit 3.2-6 Certainly seems to support the selection of the Anderson Middleton site as the preferred project alternative.
- L-001-046 | Page 3.2-16 – Exhibit 3.2-8 Certainly seems to support the selection of the Anderson Middleton site as the preferred project alternative.
- L-001-047 | Page 3.3-12 – Under Aberdeen Log Yard Alternative it is noted that a least a portion of the dredged material will require upland disposal. Is the cost difference and transportation impacts of upland disposal been analyzed in the DEIS? If not, why not?
- L-001-048 | Page 3.7-14 -The Anderson and Middleton Site has additional unused area. It is not clear why the fish trap complex cannot be avoided on this site.
- L-001-049 | Page 3.8-9 - Exhibit 3.8-4 Does not discuss the potential economic impact of material produced in the region being used by the project. Further the exhibit notes that traffic impacts may be less at the Aberdeen site, however this statement is not reconciled with the fact that transportation and materials quantities exhibits in this document show a significantly higher quantity of materials to and from the Aberdeen site will be required.
- L-001-050 | Page 5-2 - The potential for ground settlement at the Aberdeen Log Yard could have impact on the Aberdeen Wastewater Treatment Plant. This is not mentioned except in abstract terms.
- L-001-051 | Page 5-7 - The noise from pile-driving as it relates to Fish and Wildlife or humans?

L-001-020

We agree that it would be helpful to include the length of the affected shoreline in the discussion. It has been added to the FEIS text. Thank you for your comment.

L-001-021

WSDOT contacted Ecology staff to determine whether they could provide a citation for the 80% estuarine loss statistic. Ecology did not recall making this statement at PCPACT meeting, but did recall discussing another study, which compares estuarine habitat loss between 1853 and 1955 (Borde et al, 2003, Habitat Change in Coastal Estuaries over Time, as published in Estuaries, Vol 26, No. 24). This study states that the greatest habitat loss between these two time periods was “the decrease in flats” (by 22%, as cited in the report). Ecology’s point for discussion was that it is very difficult to determine what is defined as “estuary” based on available literature.

After the follow up conversation with Ecology, WSDOT’s chose to retain the citation used in the DEIS for estimated estuarine loss for the Final EIS.

L-001-022

WSDOT held two public meetings in fall 2009 with commercial and recreational fishermen, including oyster growers, regarding the project, and pontoon moorage specifically. The issue of shoaling at Whitcomb Flats did not come up in these meetings. However, WSDOT had extensive discussions with DNR regarding the potential effects on sediment transport from moored pontoons, and on Whitcomb Flats, specifically. In response to these concerns, WSDOT engaged a coastal engineer to model the effects of the pontoon moorage on sediment transport specifically. The results of this study showed transient effects (1- to 3-foot sand waves on the bottom of the Harbor floor) that could extend a short distance from the moored pontoons. These sand waves

would disappear with pontoon removal. A copy of the report, entitled "Final Estuarine Process, Environmental Support, Technical Memorandum," WSDOT November 2009, is available on request.

L-001-023

WSDOT respectfully disagrees. While we do agree that there is more dredging for launch channel construction at the Preferred Alternative than at the Anderson & Middleton Alternative, as shown in Exhibit 3.1-4 of the Draft EIS, that is just one factor, and one area of impact analysis. If one compares wetland impacts, for example, construction at the Anderson & Middleton Alternative site would result in nearly four times the impact to palustrine wetlands than construction at the Preferred Alternative. The sites cannot be viewed in isolation by element of the environment, rather it is the sum total, including cost, and a variety of other factors, all detailed in the Draft EIS, which result in WSDOT's identifying the Aberdeen Log Yard Alternative as the Preferred Alternative. This discussion is re-iterated in Chapter 2 of the Final EIS.

L-001-024

Derelict fishing gear is commonly understood to be unused or abandoned fishing gear, including lines, nets, and crab pots. These items can accumulate on the sea floor, and entrain active fishing gear. They can also be a hazard to divers and recreational users of the Harbor. In addition, they create a potential entrapment hazard for marine birds and mammals. This explanation has been added to the FEIS in Chapter 5 under the heading *How could cumulative effects on fish and aquatic resources be mitigated?*. The FEIS will acknowledge that derelict fishing gear is a problem, and it could be specifically targeted for cleanup or removal in a more coordinated way than existing efforts.

L-001-025

This text has been modified to clarify that the western portion of the site would not be directly affected by construction of the casting basin.

L-001-026

The discussion on page 3.1-53 is in direct response to the question: "How would construction of the casting basin directly affect wildlife and their habitat?" In this context, it is not appropriate to call out the area that is not directly affected, though we did clarify this earlier in the text, per your suggestion.

L-001-027

WSDOT respectfully disagrees. Avoiding impact to existing wildlife habitat is possible at the Anderson & Middleton Alternative because the site, in total, is quite large. However, construction of the casting basin at the Anderson & Middleton Alternative would result in 4.8 acres of palustrine wetland fill, versus 1.04 acres of palustrine wetland fill at the Preferred Alternative. WSDOT does not analyze impacts to elements of the environment in isolation, so therefore disagrees with the conclusion that the Anderson & Middleton Alternative would result in less environmental impact than the Preferred Alternative. Other factors, as presented in the Draft and Final EIS, support the choice of the Aberdeen Log Yard Alternative as the Preferred Alternative.

L-001-028

This reference has been removed from the Final EIS in response to this comment, which states that Chapter 3A.30.0108(1)(d)(i) of the Hoquiam Municipal Code does not apply to the Anderson & Middleton Alternative.

L-001-029

This reference has been removed from the Final EIS.

L-001-030

The text referred to in this comment was revised to note that both the Washington State Patrol and the Grays Harbor County Sheriff's Department enforce traffic laws in unincorporated parts of Grays Harbor County. In addition, Exhibit 3.11-3 was revised to include the Grays Harbor County Sheriff's Department as a public service provider.

L-001-031

As noted in the Transportation and Geology and Soils sections of the Draft EIS, WSDOT's preliminary survey for local material and disposal sites indicates that most of these sites are located east of both build alternative sites (see Exhibit 3.2-7). Consequently, WSDOT assumes for the purpose of the environmental evaluation that most of the truck trips will originate from the east. WSDOT has analyzed trucking as the mode of transport for this project because this assumption best captures the worst-case transportation impact on the surrounding communities. Final decisions about which specific material and disposal sites will be used for this project will be made after the Final EIS is published.

L-001-032

The referenced text has been revised to note the City of Hoquiam's new Waterfront Development District, which includes the Anderson & Middleton Alternative, and that the proposed project action is a permitted use within it.

L-001-033

As requested, the referenced text has been expanded to include discussion of the Grays Harbor Estuary Management Plan, which provides jurisdictional and regional linkage between the State of Washington Shoreline Management Act and the Shoreline Master Programs of the Cities of Hoquiam and Aberdeen. Please see Chapter 3.12, Land Use, in the Final EIS for discussion of the Grays Harbor

Estuary Management Plan and a discussion about this project's consistency with it.

L-001-034

Comment noted. Because WSDOT considers the referenced Draft EIS text to accurately describe the Port of Grays Harbor Master Plan recommendations, the text remains unchanged in the Final EIS.

L-001-035

While it is likely that overall noise levels in the immediate area of the Aberdeen Log Yard Alternative would increase during pontoon-building operations, WSDOT's analysis indicates that the attenuation distance of noise-sensitive residential properties from the Aberdeen Log Yard Alternative and the shielding provided by existing commercial structures would result in noise levels at the noise-sensitive residences that meet State of Washington noise control standards.

L-001-036

WSDOT performed traffic noise projections for both sites equally, and projections for both sites recognize that there would be truck hauling near residential properties. No changes in the analysis are required.

L-001-037

It has not been determined that all source materials for the project will be transported by truck. The traffic analysis assumes all materials would be transported by truck to allow the greatest potential truck traffic volume to be analyzed and those potential effects described. The Draft EIS states that some materials may arrive by rail or barge.

L-001-038

Bicycling opportunities on roads around the airport and on the SR 109 spur connecting to US 101 consist of roadway shoulders. Bicycling

routes around the Aberdeen Log Yard Alternative would be similar and would consist of roadway shoulders.

L-001-039

The comment about the Aberdeen Log Yard alternative having a greater estimated number of truck trips is noted. However, the decision to select the Aberdeen Log Yard as the preferred alternative is based on factors other than the number of truck trips. Specifically, the key factors in determining the preferred alternative were project costs and risks and cultural resources. Please see Chapter 2, Project Alternatives, in the Final EIS for more discussion on why Aberdeen Log Yard has been identified as the preferred alternative for this project.

L-001-040

No preferred alternative disposal sites have been chosen at this time, in order to leave the decision open to contractor choice. A map of possible sites being considered at this time can be found as Exhibit 3.2-7 in Section 3.2 of the Draft EIS, Geology and Soils. The city lagoon located west of the Anderson & Middleton Alternative was considered for treatment of excavated materials for both sites. See Exhibit 3.2-8 in Section 3.2, Geology and Soils, and Exhibit 3.3-3 in Section 3.3, Hazardous Materials, regarding potential long-term contaminants.

L-001-041

WSDOT has coordinated with the Puget Sound & Pacific Railroad, who operates track in Grays Harbor in the area of the build alternatives, during the preliminary design process. Since the design is still in the preliminary stage, no specific plan has yet been completed for interactions between truck and train traffic. However, coordination between the parties has resulted in a general agreement to assign a WSDOT/contractor representative to meet early each day with railroad personnel during the project to discuss anticipated traffic for the day,

challenges that may arise because of that traffic, and potential measures to address those challenges.

L-001-042

The City sewer lagoon is referenced under “Haul Route Distance”. Traffic analysis for the Anderson & Middleton and Aberdeen Log Yard Alternatives was conducted for scenarios both with and without use of the Hoquiam wastewater treatment plant lagoon. The potential transportation effects of using the wastewater treatment lagoon are captured in the ranges described in the FEIS.

L-001-043

Transportation mitigation measures that WSDOT is able to commit to at the time of the publication of the FEIS are located in Chapter 5, Mitigation, in the Transportation section. WSDOT will implement a traffic control plan, which is standard procedure, and comply with any commitments made with the local jurisdiction for the use of their streets.

L-001-044

The Final EIS has been revised to state that the Grays Harbor viewshed includes partial views from Beacon Hill, Scammel Hill, Aberdeen Highlands, Hospital Hill, Bel Aire, and the US 101-Hoquiam River Bridge.

L-001-045

Yes, the amount of dredged material is greater for the Aberdeen Log Yard Alternative. However, the quantity of dredged material expected for each alternative was not a key factor in determining the preferred alternative. The key factors in determining the preferred alternative were project costs and risks and cultural resources. Please see Chapter 2, Project Alternatives, in the Final EIS for more discussion on why Aberdeen Log Yard has been identified as the preferred alternative for this project.

L-001-046

After design refinements conducted between the publication of the Draft EIS and the Final EIS, the two build alternatives are quite similar in the estimated excavated materials quantities. The notable difference is in the dredged materials quantities, where the Aberdeen Log Yard Alternative would have a greater quantity of dredged materials. As noted in the response to comment L-001-045, geology and soils effects were not a key factor in determining the preferred alternative for this project. Rather, the key factors in determining the preferred alternative were project costs and risks and cultural resources. Please see Chapter 2, Project Alternatives, in the Final EIS for more discussion on why Aberdeen Log Yard has been identified as the preferred alternative for this project.

L-001-047

Since publication of the Draft EIS, WSDOT has learned that the dredged materials at the Aberdeen Log Yard Alternative would be suitable for open-water disposal. The text in Section 3.3, Hazardous Materials, of the Final EIS has been updated to include discussion of the analysis that lead to this conclusion and the conclusion.

L-001-048

The fish trap components discovered on the Anderson & Middleton Alternative are generally long linear features consisting mostly of several parallel rows of stakes scattered across a large area. The property was investigated systematically by excavating trenches laid out in a grid pattern. Once fish trap features were identified in one trench, the adjacent trenches were not excavated to the same depth, so as not to cause damage to any remaining buried portion of the feature. In short, the full extent of the fish trap features was not delineated, but it is likely that such features are present at other locations on the Anderson & Middleton Alternative and may extend across the site. Given the size of the proposed casting basin and the depth of excavation that would be required to construct it, there would be a high probability of encountering

further fish trap features on other parts of the property. The project could not be redesigned to avoid any fish traps potentially present on the property.

L-001-049

The discussion of casting basin construction effects in Exhibit 3.8-4 has been revised to state that local businesses could supply construction materials, increasing sales and revenues for those business. WSDOT has developed a smaller design for the casting basin than was presented in the Draft EIS, resulting in fewer truck trips for the Grays Harbor Build Alternatives. Consequently, truck trip estimates have been revised down throughout the document.

L-001-050

With design refinements since the Draft EIS was issued, the groundwater removed through dewatering would be reinfiltated into the ground in biofiltration swales along the site perimeter near the Aberdeen Wastewater Treatment Plant. This design feature is presented in the FEIS, Chapter 2, under the heading *What is Aberdeen Log Yard Alternative (Preferred Alternative)?*, in the Dewatering subsection. This reinfiltration of groundwater along the perimeter would mitigate for ground settlement that could otherwise occur and potentially affect the treatment plant.

L-001-051

The bullet does not specify because it is referring generally to potential noise effects on any receptors, which could be fish and wildlife, as well as humans near the site when the facility is being built and operated.



Grays Harbor County
Planning and Building Division

100 West Broadway Avenue, Suite 31
Montesano, WA 98563-3614

Phone: (360) 249-5579
Fax: (360) 249-3203

July 12, 2010

Margaret Kucharski
WSDOT Environmental Lead
Pontoon Construction Project
600 Stewart Street, Suite 520
Seattle, WA 98101

Subject: Draft Environmental Impact Statement Comments

Dear Ms. Kucharski,

L-002-001 The Grays Harbor County Planning and Building Division reviewed the Draft *Environmental Impact Statement (EIS)* for the proposed *State Route 520 Pontoon Construction Project* and have the following comments:

1. The subsequent pontoon moorage facility will require a *Conditional Shoreline Substantial Development Permit (CSSDP)* from Grays Harbor County.
2. The proposed Grass Creek mitigation project will require a *CSSDP* from Grays Harbor County.
3. The EIS should contain a section addressing emergency preparedness strategies for catastrophic failure to the moorage cables and anchors, and the potential for pontoon to drift inside or outside of the moorage area.

L-002-002

If you have any questions please feel free to contact this office at (360) 249-5579 or email me at rharriman@co.grays-harbor.wa.us.

We are looking forward to working with you on your projects.

Best regards,

Ryan Harriman
Land Use Planner/Shoreline Administrator
Grays Harbor County
Planning and Building Division

cc: Brian Shea, Director, Grays Harbor County Planning and Building Division

www.co.grays-harbor.wa.us

L-002-001

Should one of the Grays Harbor Build Alternatives be selected, WSDOT looks forward to continued coordination with Grays Harbor County regarding permitting.

L-002-002

The pontoon moorage system will be robustly designed to limit the risk of moorage system failure. As mentioned in Chapter 2 of the FEIS, Pontoon Towing and Moorage, WSDOT will prepare an appropriate monitoring plan for pontoons at moorage and an emergency response plan to address any unlikely potential system failure. This monitoring plan would be prepared sometime before the pontoons are ready for moorage.



July 14, 2010

Quinault Indian Nation

PO BOX 188 • TAHOLA, WASHINGTON 98587 • TELEPHONE (360) 978-8111

Margaret Kucharski, Environmental Lead
SR 520 Pontoon Construction Project
Washington State Department of Transportation
600 Stewart Street, Suite 520
Seattle, WA 98101

RE: Comments on the Washington Dept. of Transportation DRAFT EIS for the SR 520 Pontoon Construction Project

Dear Margaret:

T-001-001 The Quinault Indian Nation (Nation) offers these comments to provide technical and clarifying input to the Draft EIS, though existing comments provided previously for the Preliminary Draft EIS and the Conceptual Mitigation Plan also apply, even if not addressed or repeated in these comments. We very much appreciate you accepting these after the comment deadline.

The Nation has reserved federally-guaranteed treaty fishing rights to take fish at its usual and accustomed fishing grounds, which includes Grays Harbor and its watershed. United States v. Washington, 384 F. Supp. 312, 374 (W.D. Wash. 1974, aff'd, 520 F.2d 676 (9th Cir. 1975). Additionally, the court in this case (commonly known as the Boldt decision) confirmed that Indian tribes and the state of Washington are co-managers of fisheries resources. Treaties are the highest law of the land and create a special fiduciary duty upon all agencies of the United States to protect treaty rights, including fishing rights. Parravano v. Babbitt, 70 F.3d 539, 546 (1995); Seminole Nation v. United States, 316 U.S. 286, 297 (1942). The Nation has defined legal rights and interests that will be affected by the proposed SR 520 Pontoon Construction Project and provides these comments accordingly and in light of the corresponding federal obligation to protect our treaty fishing rights.

The Draft EIS has improperly narrowly construed the Nation's interest or concerns to only be in regards to the physical access to fishing areas by its fishers. However, at least as important to the Nation is the continued status of those stocks upon which the Nation's fishers rely, which necessarily includes the habitat for those stocks. The Nation has identified such concerns in attempting to attain windows to avoid juvenile fish encounters in construction and operations of the casting basin, in mitigation of downstream effects of launch channel excavation, in evaluating any potential upriver surface mining impacts on adjacent surface waters, and in seeking appropriate and effective mitigation, etc.

SR 520 Pontoon Construction Project DEIS Comments of Quinault Indian Nation

T-001-001

WSDOT acknowledges the Nation's concerns about continued status of fishing stocks and habitat. The following text has been added to the tribal fishing discussion in the Ecosystems section to acknowledge these concerns: In addition to managing these fisheries, the Quinault Indian Nation has expressed an equally strong concern for habitat protection, restoration, and management. The continued existence of the fishery stocks, upon which the Nation's fishers rely, is dependent both on fishery stock management and on habitat protection and restoration. Similar language has been added to Chapter 6 of the FEIS. WSDOT is identifying measures to avoid, minimize, and mitigate effects to habitat and fisheries through the environmental review process. Please see the response regarding mitigation. In addition, the following text, which is included in the Final EIS, describes potential measures for avoidance and minimization of impacts to fish and aquatic resources:

Avoiding effects, to the greatest extent practical, is an essential part of WSDOT's early project planning. WSDOT would apply best management practices to help minimize direct effects on fish from casting basin facility construction and operation. WSDOT would handle and treat all stormwater runoff in accordance with state water quality requirements using WSDOT's Highway Runoff Manual (WSDOT 2008a), and use features such as sediment ponds and wet ponds (constructed basins that have a permanent pool of water throughout the year) for stormwater retention to prevent water quality degradation.

Depending on final design, WSDOT would likely implement some or all of the following best management practices at either build alternative site: Perform in-water work only during published work windows, as directed by the appropriate agencies, to minimize the likelihood that fish are present during the in-water construction activities; Implement measures to minimize the loss of sediment or debris from the dredging footprint; Design and implement a fish-handling system at the casting basin to minimize or eliminate fish stranding or entrapment within the

Issues the Nation will further address here are: 1) indirect and cumulative effects; 2) foreseeable actions; 3) the concept of excess mitigation as opposed to the concept of environmentally preferable mitigation; 4) use of the ecology bucket for inter-tidal and sub-tidal excavation and use of cofferdams; 5) juvenile and adult fish windows during construction and operations and effects of shortening of the pontoon launch windows to 4.5 months; 6) on-site storage of dredge materials; 7) corrections to catches of Green and White Sturgeon attributed to Nation fishers as well as run and spawn timing information about spring/summer Chinook and winter Steelhead; 8) completion of title searches for final casting basin and potential mitigation sites; and 9) the Nation's viewpoint about inclusion of harvest impacts in assessment of fishery stock status (chapter 3, page 35).

- T-001-002**) As previously proposed to WSDOT, the Nation views the cumulative displacement of habitat surface and water column functions to be just as important as the limited function proposed to be mitigated. WSDOT must address the cubic amount of substrate displacing habitat function as a cumulative effect on the environment.
- T-001-003**) A) Under the National Environmental Policy Act, an EIS must include analysis of the direct and indirect effects of the proposed action and all reasonable alternatives, including "no action;" identification of impacts; discussion of the environmental effects of the alternatives; and identification of appropriate mitigation measures and discussion of means to mitigate adverse environmental impacts(40 CFR §1502.14 and §1502.16). We do not believe the Draft EIS meets these requirements. The proposed project includes all foreseeable components of the pontoon construction, to further include a) the potential affect of surface mines from which materials will be provided that lie within the Grays Harbor and Chehalis Basin to affect the adjacent water bodies, their water quality, fish habitat and fish stocks, and b) the comparison of affects of the selection among compensatory mitigation sites to affect aquatic productivity, water quality, fish habitat and fish stocks
- T-001-004**) B) WSDOT has included a section described in Appendix S regarding the assessment of indirect and cumulative affects of all other foreseeable actions and projects(40 CFR § 1508.8 and CFR §1508.7). We believe the guidance described in Appendix S page 9 specifies all of the projects being planned by the WSDOT, USACE and other entities in the Upper Chehalis Basin Watershed under the Chehalis Basin Flood Control Program that has been authorized by Congress for impacts on water bodies, their water quality, fish habitat and fish stocks, and should include the affects of potential growth/development patterns that would be expected as a result of that project. We also believe that if WSDOT finally proposes to claim excess mitigation for a mitigation project, those future transportation projects toward which it indicates the mitigation will be directed, have to be included in the cumulative assessment.
- T-001-005**) The WSDOT has not yet finalized an actual plan for the proposed mitigation site. Therefore, the proposed mitigation cannot be fully discussed as required by NEPA (40 CFR §1502.16). Given only a preliminary understanding of the proposed concept, the Nation questions the appropriateness of the site over other sites given that the criteria for selection was that it was environmentally preferable because of claimed habitat gains over

facility; Implement best management practices, such as using bubble curtains, for sound attenuation during in-water pile-driving, thus minimizing underwater noise levels that could injure fish; Develop a spill prevention, control, and countermeasures plan and maintain the necessary materials for containing accidental spills onsite before and during construction; Prepare and implement a temporary erosion and sediment control plan to minimize and control pollution and erosion from stormwater.

WSDOT proposes locating the pontoon moorage in deep water away from the shoreline where the pontoons would have minimal effects on tidal exchange, currents, or substrate distribution in Grays Harbor, all of which might affect fish. (Exhibit 2-7 in Chapter 2, Project Alternatives, shows the proposed moorage locations). To ensure that no invasive aquatic species, such as green crab, would be transported out of Grays Harbor on the pontoons, WSDOT would monitor the pontoons for aquatic species growth and clean the pontoons, as needed, before they leave the harbor. For pontoon moorage, WSDOT has also selected the least environmentally damaging anchor system available, which would have the least disturbance on harbor sediments and add the least amount of underwater structure. (Please see the response about surface mining.)

T-001-002

Impacts to aquatic habitat at the pontoon construction and moorage sites (as well as aquatic habitat improvements at Grass Creek) were characterized using both changes in elevation (depth profile) and area. WSDOT considered these impacts as direct effects, defined as effects caused by a direct result of the project activities.

Please see Table 4.2 of the Conceptual Mitigation Plan, shared with the Quinault Indian Nation staff in May 2010. These metrics are commonly used by WDFW to describe changes in aquatic habitat that can impact aquatic species. This impact characterization approach is consistent with existing regulatory processes, including Corps dredging permits. The

T-001-005 | a major area of the site. This became a significant issue after the preferred site was identified when WSDOT then indicated it would seek excess credit to offset the impacts of other transportation projects to occur later. At this point the Nation has not been provided any information to indicate that the preferred project will provide compensation (including displacement) comparable to excavation of the launch channel over any other site. But, if excess mitigation credit was to be claimed—that excess credit should not be applied as a positive attribute to the selection or assessment of the Pontoon Project impacts. In the Nation's view, regulatory agencies have not had the time to formulate a rational policy on who should select and prioritize between mitigation and restoration sites, or to rationally apply any concept of excess or advanced mitigation. We question allowing private and public development entities total control over selection among potential restoration sites that could ultimately affect the status of public resources.

T-001-006 | The use of containment fences or sheet pile seems to be arbitrarily limited in WSDOT's mitigation statements to only be considered in currently dry areas of the casting basin project. The Nation believes that even with an ecology clam bucket WSDOT needs to commit to considering isolation of portions of the launch channel that lie beyond the OHWM. Debris such as piles or other materials that would be encountered with a clam bucket should be expected to interfere with the effectiveness of a clam bucket to hold all sediment. The Nation recommends that containment in the wetted areas be considered in conjunction with considering the potential impacts of initiating such containment efforts in comparison to allowing sedimentation.

T-001-007 | Given the specific movements of juvenile and adult salmonids past the project area over a year long period there are very limited windows of opportunity to avoid encountering vulnerable juvenile and adult fish. Providing a launch window every 4.5 months instead of 6 months could add significantly greater difficulty to finding benign fish launch windows as well as maintaining them for more than one cycle in an intense construction period. Consultation among the permitting agencies, WSDOT, the Nation and the contractor need to occur to assure strict adherence to minimize impacts to the fisheries and fish resources.

T-001-008 | The Nation prefers that dredge material that is not chemically benign and structurally relevant to future use in Grays Harbor not be stored for a significant period at the casting basin site. If any dredge material is determined to be desired for the stock piling and use be assessed among the agencies and the Nation at some time after such a use was determined to be desired by the contractor and WSDOT.

T-001-009 | The Nation has complete records of sturgeon caught in its fisheries. The harvest numbers in the report are inaccurate and appear just the opposite between white and green sturgeon of what actually occurred. The Nation requests that WSDOT consult with Quinault Fisheries staff to obtain the correct catch records for sturgeon within Grays Harbor. Similar concerns occur in the characterizations of run and spawn timing for spring/summer Chinook and winter Steelhead in the Chehalis River.

T-001-010 | The Nation recommends title searches to confirm when the preferred sites inter-tidal and sub-tidal lands would have initially been conveyed to the state or another entity, and as to

manner in which impacts were characterized includes consideration of the volume removed, the area affected and the elevation/water depth change in the affected area. The dredge channel results in deepening of habitat. WSDOT has characterized this deepening in exhibits 3-7 and 3-8 of the Ecosystems Discipline Report.

T-001-003

WSDOT is committed to compliance with environmental laws. Between the Draft and the Final EIS, WSDOT has refined the mitigation plan and prepared additional information to address the Nation's concerns to the extent possible at this stage of the project. For example, the Final EIS acknowledges that the Grass Creek has been selected as the proposed mitigation site. In permitting stages, WSDOT will work with regulatory agencies and the Nation to further coordinate on project mitigation issues.

Surface mines (quarry and pit sites) are permitted and managed by the Washington Department of Natural Resources (WDNR) under the Surface Mining Act (RCW 78.44 and WAC 332-18). All surface mines must undergo a permitting process that includes avoidance and minimization to reduce impacts to natural resources (including, but not limited to, water quality, wetlands, fish and wildlife, air quality, etc.). Surface mines must undergo State Environmental Policy Act review, and acquire applicable local, state, and federal permits. A comprehensive list of surface mine regulations can be found at: http://www.dnr.wa.gov/Publications/ger_ofr2003_mining_regulations.pdf.

WSDOT does not prepare a separate analysis of existing permitted commercial surface mines, but does require that the contractor comply with applicable laws and regulations.

WSDOT has been coordinating with regulatory agencies as well as the Quinault Indian Nation staff on mitigation planning through the Pontoon Construction Project Agency Coordination Team (PCPACT) since 2008.

T-001-010 | what subsequent transactions occurred. From the description in Appendix E, page 22 it appears inter-tidal and sub-tidal lands existed on at least the southern end of the Aberdeen Log Yard as late as 1947 through 1971. Thus, the Nation believes that unresolved ownership issues could arise bringing into question the original authorization to fill in those aquatic lands. If proper official authorization were not verified, the Nation would propose that mitigation be provided for the original resource condition as though those conditions should have continued to exist today.

T-001-011 | The discussion about impacts that includes identifying overharvest as a contributing factor to the fish resource condition is beyond the scope of this EIS. The concept of "Overharvest" has multiple uses or interpretations to it that do not necessarily denote overall harvest rates or harvest in a particular limited area as a negative factor in the status of that resource. The Nation is not aware of assessments provided by other management agencies to indicate local fisheries have caused any GH origin stocks to be depressed to chronically low levels. Page 3.1-26, in the section "What has led to the condition of fish and aquatic resources in the study area?" lists overharvesting as a factor to the fish condition. It is not clear if this is accurate for the local area or if this is a broad statement related to fish stocks in general. Regional and Grays Harbor fisheries management mitigates potential harvest impacts year in and year out by adjusting the fisheries toward meeting a goal of maximum sustainable harvestable numbers of fish in each managed wild run. Each season's fishery plan institutes catch, schedule and gear restrictions in order to provide natural escapements of fish that can achieve harvestable returns or incrementally improve the returns of their offspring so long as other factors such as habitat perform as expected. Monitoring of the returns of the offspring occurs directly to adapt the restrictive measures from season to season. This type of adaptive management does not occur in the habitat world. Habitat impacts tend to be long-lasting and compounded as development increases with little direct monitoring of results on the fish populations or the capability to actually counteract unexpected outcomes from projects or their mitigation.

Thank you for your consideration of these comments. If you have any questions, please address them to Dave Bingaman, Director of the Nation's Division of Natural Resources, at 360/276-8211 ext. 374 or dbingaman@quinault.org.

Sincerely,



Fawn R. Sharp, President
Quinault Indian Nation

cc:
WSDOT email: sr520pontoon_deis@wsdot.wa.gov
David Bingaman
Mark Mobbs

Although not identified in the DEIS, the Grass Creek site was selected as the proposed wetland mitigation site after a rigorous evaluation process, involving input from the PCPACT, field reconnaissance, and ecological evaluation of many sites within Grays Harbor. WSDOT determined that Grass Creek would provide the most value to the State while satisfying the regulatory requirements for mitigation of project impacts. The approach to habitat restoration at Grass Creek (dike removal) is a proven restoration strategy with a high likelihood of success in restoring ecological functions for both wetlands and aquatic habitat. The habitat restoration available at Grass Creek aligns well with the estuary restoration priorities identified in the Grays Harbor Estuary Management Plan (GHEMP). Cumulative displacement of estuarine habitat includes both displacement by fill and displacement by diking to exclude salt water from near shore areas. The restoration of saltwater inundation at the Grass Creek site to its historic condition aligns with the landscape priority to restore estuarine habitat where it has been displaced by fill or dike construction.

A brief summary of the site selection process, including anticipated functional lift, will be added to the Final EIS, as follows:

Wetland Mitigation

Unavoidable direct effects on wetlands that would occur as a result of constructing either of the build alternatives would require compensatory mitigation to offset the permanent loss of existing wetland functions. The goal of compensatory mitigation is to achieve no net loss of wetland functions and values. WSDOT would follow federal, state, and local requirements for wetland mitigation to determine appropriate compensatory mitigation for project effects.

As part of project design, WSDOT has avoided and minimized effects on wetlands and wetland buffers to the greatest extent practicable. WSDOT, working in collaboration with regulatory agencies, the Quinault Indian Nation through the PCPACT process selected the Grass Creek

mitigation site (see Exhibit 3-1 in chapter 3) as the location where anticipated compensatory mitigation would be constructed if one of the build alternatives is selected. As part of the mitigation site selection criteria, WSDOT has also undertaken analyses to ensure that the selected mitigation site would avoid exposure to toxic materials or effects on culturally significant resources to the greatest degree practicable.

The Grass Creek mitigation site is bounded on the east by Grass Creek, a freshwater system tributary to Grays Harbor. The site is currently diked off from Grass Creek to prevent overland flow at the site. The dike also prevents saltwater from intruding on the site from Grays Harbor. The intent of the wetland mitigation is to re-establish a range of estuarine wetland habitats along an increasing elevation gradient, from mudflat to upper intertidal salt marsh, and restoring natural tidal influence on the site.

Specific actions would include restoring a portion of estuarine wetland in an area that is currently an upland dike. In addition, proposed activities include removing long sections of the dike, filling drainage ditches, and revegetating the formerly grazed pasture with appropriate estuarine and palustrine native plant species. A portion of the site would also be rehabilitated to improve wetland buffer functions to the site.

Fish and Aquatic Resource Mitigation

In addition to wetland mitigation, the proposed project would mitigate for effects on fish and aquatic resources and their habitat by rehabilitating a portion of the shoreline of the Grass Creek estuary and rehabilitating existing tidal channels at Grass Creek to provide transitional habitat for outmigrating salmonid smolts and to support typical estuarine salt marsh flora and fauna.

Aquatic resources mitigation provided at the site would be in addition to

the wetland mitigation described above, and include removing portions of the dike along the eastern boundary to restore/enhance natural hydrology/tidal exchange in five existing tidal channels. WSDOT would use material excavated from the dike to fill an existing man-made ditch located around the inner perimeter of the existing dike. This would restore/enhance natural hydrology/tidal exchange and floodplain connectivity in the existing tidal channels and create backwater channels (also called blind sloughs). The Conceptual Mitigation Plan (WSDOT 2010) also calls for creation of open mudflat habitat at the outlet of a blind tidal channel at the Grass Creek mitigation site.

In addition to creating mudflat, WSDOT would rehabilitate portions of the existing degraded mudflat tidal channels by removing a non-functioning tide gate to help restore natural hydrology/tidal exchange in an existing tidal channel. Habitat complexity within and adjacent to the enhanced tidal channels would be created by installing habitat structures (e.g., large woody debris) and vegetation enhancement to increase organic material and nutrient input.

WSDOT would monitor the proposed mitigation site for 10 years. Monitoring, contingency, and site management plans would be provided and used to adaptively manage the mitigation site.

WSDOT is committed to use of the Grass Creek site to meet regulatory mitigation requirements, but is working with the Nation regarding mitigation opportunities for Chehalis fish stocks.

T-001-004

WSDOT has added the planned and funded components of the Chehalis River Basin Flood Resources Program to graphics and tables in Chapter 3 which refer to reasonably foreseeable actions. Two projects are currently funded and underway: the Twin Cities Flood Damage Reduction Project, authorized by Congress in the Water Resource

Development Act of 2007, and the Chehalis River Basin wide General Investigation, funded and cooperatively managed by the Army Corps of Engineers and participating agencies, which is developing ecosystem restoration and flood risk management plans. However, the analysis for the Pontoon Construction Project will not address the direct effects of potential growth/development patterns from the Corps projects, because those are not effects directly resulting from the Pontoon Construction Project.

No WSDOT projects were identified in Grays Harbor because they did not meet WSDOT, FHWA, and EPA guidance criteria, as described in the Indirect and Cumulative Effects Methods Memorandum. Thus, they could not be included in the cumulative effects discussion.

The Grass Creek site has the potential to provide a substantial amount of mitigation acreage beyond what is needed for the Pontoon Construction Project. WSDOT will rehabilitate the whole mitigation site rather than a portion, because the site is largely one hydrologic unit. WSDOT estimates that the Grass Creek site will generate about 46 acres of rehabilitated wetlands in excess of the mitigation needed for this project. There are no identified transportation projects that could use excess acreage at the Grass Creek mitigation site. WSDOT will coordinate with the Nation on any potential future uses of excess acreage at the Grass Creek site.

In the Final EIS, WSDOT will consider the proposed mitigation tied to this project proposal as well as other means of mitigating cumulative effects on resources.

T-001-005

WSDOT has been coordinating with regulatory agencies as well as the Quinault Indian Nation staff on mitigation planning through the Pontoon Construction Project Agency Coordination Team (PCPACT). PCPACT

has been discussing impacts to ecosystems and proposed mitigation since late 2008. The Grass Creek site was selected as the proposed wetland mitigation site after a rigorous evaluation process, involving input from the PCPACT, field reconnaissance, and ecological evaluation of many sites within Grays Harbor. In addition, local land use and regulations pertaining to the candidate sites were considered during the screening process. As the project applicant, WSDOT selected the Grass Creek site with the support of PCPACT and determined that the Grass Creek site would provide the most value to the State while fully mitigating for regulated project impacts. A brief summary of the site selection process, including anticipated functional lift, has been added to the Ecosystems section. The U.S. Army Corps of Engineers and the Department of Ecology issued draft guidance on excess mitigation for review in summer 2010, and WSDOT expects the agencies to issue final guidance soon. The Grass Creek site selection process meets the draft guidance criteria.

WSDOT is not proposing the use of excess mitigation for private use. WSDOT will include language in the mitigation plan that WSDOT will coordinate with the Nation on any potential future uses of excess acreage at the site.

T-001-006

All in-water work will be performed in accordance with the 401 and 404 Ecology and U.S Army Corps of Engineers permits and the Water Quality Monitoring Plan (WQMP) to confirm that dredging activities meet the required permit and plan conditions relative to turbidity at specified distances from dredging operations, the points of compliance. The WQMP will include dredging BMPs and dewatering BMPs to minimize water quality impacts, and will require compliance with state water quality standards. Water quality monitoring will be conducted during dredging and barge dewatering to ensure compliance with water quality criteria at the point of compliance, in accordance with the WQMP. The WQMP will also include BMPs to be implemented for barge dewatering,

including the filter material, frequency of changing the filter material, and filling of the barge with dredged material.

Experience has shown that with the currents present in the Chehalis River, the use of a silt curtain during dredging operations would not be implementable and would potentially have adverse effects on the dredging procedures relative to water quality. If water quality monitoring indicates exceedences of the water quality standards at the compliance boundary (i.e. turbidity), then corrective actions would be implemented, such as confirming that environmental buckets are functioning properly, and/or ceasing work until turbidity exceedances are no longer occurring will be implemented and further identified in the WQMP.

T-001-007

WSDOT recognizes the Nation's concern for juvenile and adult salmonids moving past the project area throughout the year. To avoid and minimize for potential adverse effects to salmonids and their habitat, WSDOT narrowed the width and depth of the launch channel and redesigned the fish-handling system within the casting basin. WSDOT designed and would implement a fish-handling system at the casting basin to minimize or eliminate fish stranding or entrapment during pontoon tow-out. Fish-handling protocols will provide a procedure for collecting, removing, and releasing fish trapped in the basin. Pump intakes will be screened and velocities will be kept at no more than 0.4 ft./s across the screen. By including these measures to avoid and minimize impacts to fish resources, WSDOT believes sufficient measures to protect fish will be employed regardless of the launch interval.

A brief description of the fish handling system has been included in the FEIS as follows:

Since the Draft EIS was issued, WSDOT has revised the effects analysis for the shoreline, fish, and aquatic resource habitat to reflect the modified launch channel design. Because the launch channel would be smaller than was discussed in the Draft EIS, effects on fish and aquatic

resources would be less than originally anticipated. WSDOT has also designed a new method for safely removing any fish that become entrapped in the casting basin when the basin is flooded to float out pontoons. This section has also been updated to reflect comments from the public, reviewing agencies, and the Quinault Indian Nation. WSDOT would also design the casting basin to allow any fish that do become stranded as the gates are closed to be safely removed. WSDOT would monitor the casting basin during draining operations. Any fish collected in the casting basin would be herded gradually, in a controlled manner, to a fish collection box, and released into Grays Harbor using protocols consistent with NOAA Fisheries, USFWS, and WDFW requirements (WSDOT 2009a). WSDOT will include the Quinault Indian Nation staff in coordination with other agencies on the fish-handling plan, and will develop communication protocols with the Nation to notify them about in-water work (such as gate openings) to avoid impacts to fishing.

T-001-008

In accordance with the U.S. Army Corps of Engineers Dredged Material Management Program (DMMP) procedures, additional sediment testing has been conducted at the Aberdeen Log Yard site, within the proposed launch channel location. The recent analysis suggests that all dredged sediments will be suitable for open water disposal. No dredged sediments are proposed for upland storage onsite. WSDOT provided the Final Dredge Material Management Program Sediment Characterization Report to the Quinault Indian Nation staff on September 10, 2010.

T-001-009

Thank you for the correction. WSDOT coordinated with Quinault Indian Nation Fisheries staff to update catch records for sturgeon in the Ecosystems section as follows:

In 2008 the Quinault Tribal member yearly harvest of white sturgeon in Grays Harbor was 3,111 fish. In 2009 the Quinault Tribal member yearly

harvest of white sturgeon in Grays Harbor was 1,107 fish. (Jim Jorgensen, personal communication). Data for green sturgeon catches by the Quinault Tribal fishery in Grays Harbor are available for 1997 (186 fish); 1998 (59 fish); and 1999 (54 fish). After 2007 retention of green sturgeon were prohibited along the entire coast (Jorgensen, personal communication).

T-001-010

WSDOT performed title searches on the Aberdeen Log Yard site, specifically when inter-tidal and sub-tidal lands would have initially been conveyed to the state or another entity and subsequent transactions. No unresolved ownership or authorization issues were found. An update on this information was provided to the Quinault Indian Nation staff at a meeting on July 22nd, 2010.

T-001-011

Text has been edited in the Ecosystems section of the FEIS to clarify that references to over-harvesting were general statements about the historic condition in Grays Harbor, and not in reference to the Quinault Indian Nation's fisheries management:

In general, fisheries and aquatic resources and their habitat within the study area have been substantially degraded by past actions beginning in the 1850s through the present. Fisheries and aquatic resources will continue to be affected by future development actions and ongoing trends. These actions and trends include filling, diking, and dredging projects; alteration of ecosystem processes; deforestation; loss of riparian habitat; instream habitat loss and fragmentation; competition and predation by invasive species; historic overharvesting of fisheries that has affected the status of many stocks along the Pacific coast; increased impervious surface and water pollution; and changes in groundwater, stormwater, and surface water flow (Smith and Wenger 2001; Williams et al. 1975).

T-002-001

From: Margaret Henry [mailto:mhenry@squaxin.us]
Sent: Monday, June 07, 2010 9:53 AM
To: SR 520 Pontoon Construction Project DEIS Comments
Cc: Rhonda Foster; Larry Ross; mhenry@squaxin.nsn.us
Subject: SR 520 Pontoon Construction Up-Date

Thank you for sending the information about the above listed project for our review and comment. This project is not located in our traditional territory; therefore, we have no interest in it. We recommend that further consultation be conducted with the Quinault Tribe to acquire their concerns on places of cultural importance to their people. The Squaxin Island Tribe requires no further consultation on the proposed project.

Traditionally,

Margaret Henry for
Rhonda Foster, Director
Cultural Resources Dept.
Squaxin Island Tribe
360-432-3836

T-002-001

Thank you for your comment. The Squaxin Island Tribe will be removed from future mailings regarding this project. WSDOT is consulting with other local tribes, including the Quinault Indian Nation, on this project.

Comments on the Draft Environmental Impact Statement SR 520 Pontoon Construction Project

By
Frank K. Johnson, P.E.
Chairman/CEO
MegaMold™ Technology Company LLC
Boston, Massachusetts

B-001-001

Alternate Means and Methods of Pontoon Design & Construction
Before moving ahead with this project, the designers and planners should review their basic assumptions regarding construction work schedules and reinforced concrete pontoon design in light of alternative construction technologies not considered in the DEIS and operational benefits of fully encased, monolithically constructed composite concrete and steel pontoon structures.

Monolithically cast composite concrete and steel pontoons dramatically reduce the construction cycle from six months or more to less than a week per pontoon. The number of pontoons that can be cast during a one month period is a function of concrete production and delivery capabilities, not formwork, placement of reinforcement steel, curing time or availability of dry work sites.

Pontoons can be cast in the wet, obviating the need for casting basins.

The concrete of monolithically cast pontoons structures is joint-free and fully encased within a watertight shell, providing double protection against leakage.

The structural steel grillage embedded within the cast concrete produces a far more rigid box structure than concrete reinforced with steel rods.

The cost of constructing monolithic composite concrete and steel pontoons is 20% to 30% less relative to the cost of constructing reinforced concrete pontoon structures using conventional forming and casting practices.

B-001-001

WSDOT has been building floating bridges using concrete pontoons since 1940 and currently maintains a fleet of 4 floating bridges, including the SR 520 Bridge, of similar design. WSDOT has learned a great deal about building concrete pontoons in the process. As floating elements, the pontoons must be water tight. The tolerance for concrete cracks is very small in pontoon construction. Similarly, geometric tolerances are very tight in pontoon construction because, different from stand-alone structures, the pontoons must be tied together in such a way that creates a system for distributing structural forces across the entire bridge. That is, the pontoons must be built to their precise design specifications so that they will match up perfectly when connected together to form a bridge. The pontoons are also relatively complex structures requiring many openings and attachment points. WSDOT has achieved great success in constructing floating bridge pontoons using tested and proven methods for addressing these concerns by constructing pontoons in a casting basin for all of its floating bridges.

While WSDOT has considered the applicability of other construction technologies for building pontoons as discussed in Chapter 2 of this EIS, the critical nature and high cost of producing the pontoons for the SR 520 Bridge make the use of an unproven technology very risky. The use of a floating monolithic form would introduce a number of technical challenges that would put the project at undue risk. Thermal control during curing of concrete pours of the size required by the one week construction timeframes mentioned would make it very difficult to control concrete cracking. Floating forms of the size required to cast a pontoon would not likely be rigid enough to ensure that the required geometric tolerances can be met. Controlling ballast while installing interior forms, equipment, and reinforcing steel, and when pouring concrete would be extremely difficult, particularly when accounting for weather in the Pacific Northwest. Also, the monolithic form would have to accommodate the multiple openings in the pontoons for access hatches, post tensioning

Hidden Costs

The Pontoon Construction Project described in the DEIS calls for constructing a giant casting basin for the sole purpose of forming and casting 33 reinforced concrete pontoon structures. The casting basin would be sized to construct up to eight pontoons at the same time. Once the pontoons have been constructed and towed to their moorings, the state will continue to own and maintain the casting basin even though it has no further use for the facility.

Future maintenance and/or demolition costs of this facility, as well as its construction costs should be considered in calculating the cost of constructing pontoons as proposed in the DEIS and comparing the unit cost of constructing and delivering pontoons using alternate means.

The rationale for the project rests on the time required to mobilize resources and construct replacement pontoons in case the existing Evergreen Point Bridge suffers catastrophic storm damage before it is replaced. Engineers estimate it would take five years of more to replace a damaged bridge without this project. With the 33 pontoons standing by, repair/replacement time would be only 1.5 years.

The proposed Pontoon Construction Project work schedule extends for a period of over four years; 2.25 years to complete construction of the casting basin, and two more years to construct the 33 pontoons. The cost of mooring the pontoons until they are needed, and towing them to the work site from their moorings is not considered in calculating the cost of producing the pontoons. It should be to give an accurate accounting of the cost producing pontoons according to the DEIS plan.

Land Based Design and Construction of Concrete Marine Structures

The DEIS proposes to use conventional land based construction practices to produce marine or floating concrete structures. When concrete work takes place in water, temporary cofferdams are constructed to create a watertight enclosure. Water in the enclosure is pumped out to create a dry work site before concrete work begins.

The work site must be dry in order to allow workers to build and erect the temporary metal or plywood sheathed formwork and install reinforcing steel. Casting typically takes place in stages. The base slab, or keel slab in the case of pontoon construction, is formed, reinforced and cast first. Once the base slab concrete has set up, exterior and interior walls are formed, reinforced and cast incrementally, usually in forty-foot increments. After the wall concrete is cured sufficiently, the

cables, anchor galleries, railing, and other attachment points. Working directly on the water would also present logistical challenges to bringing in equipment, materials and workers.

Resolving these issues and risks would potentially add significant cost and duration to the SR 520 Pontoon Construction Project. Building pontoons in a casting basin would allow WSDOT to use proven construction methods on a stable surface in a centralized work area with ample access to necessary resources and reduce risks of project delay or cost increases.

B-001-001

forms are removed and the roof slab forms and support shoring elements are installed, followed by installation of reinforcement steel. Finally concrete the roof concrete is cast and cured.

There are many cold joints in the resulting structure; where the walls rest on the base slab, at the end of each increment of wall, and where the roof slab rests on the walls. These are all potential leakage sites. Cracks in the concrete are another source of leakage. Corrosion of concrete occurs over time when it is exposed directly to water, requiring ongoing maintenance.

The DEIS states the reasons for selecting the proposed means and methods for constructing pontoons in casting basins include the state's engineers familiarity with the process from previous experience; the process facilitates cost control,(not cost reduction); and minimizes the risk of delays. Does the proposed plan sacrifice economy and efficiency for familiarity? Did the state engineers conduct a world-wide or country-wide research into alternative means and methods of designing and constructing concrete pontoons? Is the proposed work schedule too lengthy in view of the vulnerability of the existing floating bridge?

Economic Alternatives That Accelerate Construction Should be Considered

Using conventional concrete construction practices and designs to build pontoon structures is labor intensive, time consuming and very costly. One economically and environmentally attractive alternative that should be explored more thoroughly is monolithic composite concrete and steel pontoon structures.

Using new construction technology and monolithic concrete and steel design, the delivery time for 33 pontoons can be reduced from four or more years to less than three months. This negates the rationale for constructing a casting basin, saving the state money and eliminating all the associated impacts to the environment.

Frank K. Johnson, P.E.
Boston, MA

From: jroneil3@comcast.net [mailto:jroneil3@comcast.net]
Sent: Tuesday, June 01, 2010 11:05 PM
To: SR 520 Pontoon Construction Project DEIS Comments
Subject: Re: Pontoon Design Drawings

I will get written notes together as well.

John O'Neil
1620 East McGraw Street
Seattle, WA 98112
T 206.323.9772
C 206.552.1007
jroneil3@comcast.net
<http://www.linkedin.com/pub/john-o-neil/14/321/24b>

----- Original Message -----

From: "SR 520 Pontoon Construction Project DEIS Comments"
<SR520Pontoons_DEIS@WSDOT.WA.GOV>
To: jroneil3@comcast.net
Sent: Tuesday, June 1, 2010 5:15:34 PM
Subject: RE: Pontoon Design Drawings

Dear John,

Thank you for submitting your comments on the SR 520, Pontoon Construction Project Draft Environmental Impact Statement (DEIS).

Your comments will become part of the official public record and will be published, with responses, in the Final Environmental Impact Statement. Please check the [SR 520 Pontoon Project Web page](#) for additional project information and to stay informed about the environmental review process.

Sincerely,

Margaret Kucharski
Environmental Lead
SR 520 Pontoon Construction Project
<http://www.wsdot.wa.gov/Projects/SR520/Pontoons/DEIS.htm>

From: jroneil3@comcast.net [mailto:jroneil3@comcast.net]
Sent: Friday, May 28, 2010 5:32 PM
To: SR 520 Pontoon Construction Project DEIS Comments
Subject: Pontoon Design Drawings

I-001-001 |

Have the pontoons been designed?

John O'Neil
1620 East McGraw Street
Seattle, WA 98112
T 206.323.9772
C 206.552.1007
jroneil3@comcast.net
<http://www.linkedin.com/pub/john-o-neil/14/321/24b>

I-001-001

Yes, the pontoons have already been designed. WSDOT needed to have a design for the pontoons in order to develop the preliminary casting basin design. The design-builder has chosen to build the pontoons using WSDOT's design for them.

From: CRush@thedailyworld.com [mailto:CRush@thedailyworld.com]
Sent: Thursday, May 27, 2010 1:48 PM
To: SR 520 Pontoon Construction Project DEIS Comments; SR 520 Pontoon Construction Project
Cc: MSpezia@thedailyworld.com; BBearden@thedailyworld.com
Subject: SR 520 Public Hearing, June 24 in Aberdeen

Margaret Kucharski
WSDOT Environmental Lead
600 Stewart St. Suite 520
Seattle, WA 98101

Ms. Kucharski,

I received the mailed notice of Public Hearing and Open House for SR 520 on June 24 at Aberdeen High School.

As the date of the event draws closer, I would also advise an advertising campaign in The Daily World newspaper to remind local residents of this important meeting.

Depending upon the scope of the audience that the state wishes to reach with this message, advertising can be placed in our daily publication to reach a potential reading audience of more than 25,000. We also own and operate several weekly affiliate publications which would potentially expand that audience three-fold in Grays Harbor and northern Pacific counties.

In addition to ROP advertising, we also offer targeted delivery of stand-alone inserts within our wide array of products so that you can direct your message to a specific zip code/area.

Please let myself or Advertising Director Mike Spezia know how we can help spread the word of this important event in Grays Harbor.

Sincerely,

Chris Rush
Publisher/Editor
The Daily World
(360)537-3945

I-002-001

WSDOT used multiple methods to inform the public about opportunities to view and comment on the document, including legal notices and advertising in The Daily World.

I-002-001

I-003-001

-----Original Message-----

From: Liam M Stacey [mailto:liams@u.washington.edu]
Sent: Thursday, June 03, 2010 9:40 AM
To: SR 520 Pontoon Construction Project DEIS Comments
Cc: opinion@seattletimes.com; KUOW - FM
Subject: Comments Option A, of the SR520 bridge... almost yes

Option A (with not sub-options) is by far the best design. However, it could be improved upon:

1. North-South traffic on Montlake Blvd. is clogged substantially NOT by the bascule bridge... North bound traffic is slowed by the traffic signal north of the bridge. (It is even slower with the new signal configuration for dump trucks). South bound traffic is slowed by the back up getting on to East bound SR520.

The north bound problem will be partly solved by the Husky stadium pedestrian overpass which will eliminate the need for north bound traffic to ever stop!

The South bound problem could be solved by adding an extra lane (beginning at the NOAA property) leading to an extra SR520 East bound onramp lane. This onramp lane could be tight since it would only be used when traffic is slow!

Thus we have removed the impediments to N-S and S-N traffic across Montlake cul, thereby eliminating the immediate need for a second bascule bridge.

This scenario saved megabucks, wins friends among the Montlake neighborhood, and reduces the CO2 foot print of the project.

This scenario also leaves open the option to add a second bascule bridge if traffic is intolerable. Given that the N-S light rail will be operational not long after the bridge is done, and the future price of gas, we might predict that N-S traffic may diminish over the next 50 years, thus deflating the will for more lane capacity.

2. The Arboretum access ramp option would impose 3 classes of harms, yet do not increase the capacity of the bridge.

First, the cost of these ramps is roughly \$100,000 - \$200,000 per ramp user. (roughly \$250,000,000/ 2000 drivers/day)

Second, as cited in the EIS, the traffic due to these ramps will reduce the number of pedestrians and cyclists, thereby increasing car traffic.

Third: a high volume of traffic through the arboretum and across Madison Ave would strongly reduce the efficiency of a proposed shuttle from Madison/Leschi to the SR520/Montlake transit stops. Thus these ramps would further increase car use.

Therefore we may create a shuttle stop at the Montlake/SR520 lid, so that transit users have an efficient way to get to Madison/Leschi/Madrona. With this we eliminate strong demand for arboretum access ramps, and reduce car trips, speeding the flow for more necessary bridge use.

Liam M Stacey
206 543 5767
liams@u.washington.edu

I-003-001

Thank you for your comment. However, Option A is not an alternative considered in the SR 520 Pontoon Construction Project FEIS. Comments about Option A should be directed to the SR 520, I-5 to Medina: Bridge Replacement and HOV Project at <http://www.wsdot.wa.gov/Projects/SR520Bridge/library.htm>.

I-004-001

I can't figure it out -
why would you hold this meeting
80 miles away from the bridge?
What are you thinking? Oh, maybe
because your dept has delayed this
project many times and increased the
cost by 23,000% to accommodate special
interest groups?

The function of the bridge is to move
traffic. Period. But now because
of the traffic increase expected on front
road as a result of the toll to pay for
your excesses, I will be sitting in many
traffic jams. Where is your environmental
impact statement and mitigation for that?

Charlie Hamrick ASQCQE
Chemical Engineer

11/00

I-004-001

The SR 520 Pontoon Construction Project's Draft EIS public hearing and open house was held in Aberdeen, Washington because the project's build alternatives are both located in Grays Harbor County. The actions associated with constructing a casting basin facility and building pontoons would impact the Aberdeen and Hoquiam communities. For this reason, it was appropriate to hold the public hearing in Aberdeen.

The purpose of this project, the SR 520 Pontoon Construction Project, is to expedite the construction of pontoons needed to replace the existing traffic capacity of the Evergreen Point Bridge if a catastrophic failure occurs, and to store the pontoons until they are needed. Traffic-related effects associated with building pontoons can be found in Section 3.14, Transportation, of the Final EIS. However, traffic-related effects associated with the construction and operation of a new Evergreen Point Bridge are discussed in the SR 520, I-5 to Medina: Bridge Replacement and HOV Project Supplemental Draft EIS, which was published January 2010 and is available for review on its project Website:

<http://www.wsdot.wa.gov/Projects/SR520Bridge/library.htm>.

From: eperrotti@netzero.net [mailto:eperrotti@netzero.net]
Sent: Monday, June 07, 2010 11:49 AM
To: SR 520 Pontoon Construction Project DEIS Comments
Subject: My Final Comments On The Draft EIS

Making Waves Only Over Turns The Ship

I-005-001

In the almost three decades that I have resided here, as a person who owns his own home and having a daughter attend the local schools after the loss of her mom, here are a few tidbits.

The Harbor is indeed a good place to live and raise children. The public schools here are quite good and after my child attended AHS and graduated in 2004, she went on to graduate NYU in 2008 with honors.

She then went to Spain to teach and now lives in Austin, Texas and she works there now as an ESL public school teacher in Math and Science.

But we do have challenges. The jobs here are scarce. They hire from outside the County and there are reasons for this. Perhaps one is that we do not have the skill base here, or perhaps those that have not lived here, will not make waves.

I have read the draft EIS for the pontoons. The project will create jobs and is a direct and indirect investment here. The project draft shows that the scheme uses power and that will help our PUD. The project has diagrams and it appears that it uses trucks. That helps as they have to use folks that have a CDL and we do that here at the GHC.

Now we have a new person at the GHCH and a new person at the EDC. We have a very good Port Director here and we have the RETC at Satsop and that ED there is quite good at what he does. The PDA ED is very able and very good at what she does.

So we have a team. We have a great crew at the local WorkSource GH office. My hope is that we all see this now. That if we are in the boat together and we are sitting next to one another, that we are pulling together. Meaning that you pull forward and I pull forward, not you push and I pull, as all of that does is to make us go around in circles.

There are risks though. One is litigation risk. We saw this at the County, where after we passed the County Growth Plan, some decided that the best way forward was litigation. Surely the pontoons face this, the mitigation is the no build alternative (please read that draft EIS). But that is the worst case, as the site is

I-005-001

Yes, it is expected that the proposed project, if either build alternative is selected, would create some jobs, use power from local sources, and require trucking.

WSDOT, in consultation with the Washington State Attorney General's Office, designs and constructs its project within the mandate of all applicable federal, state, and local laws and regulations. Please see Chapter 5 of the FEIS, Mitigation, for a discussion of mitigation for potential project effects.

Should one of the build alternatives be selected, there would be many options for the future use of the casting basin and support facilities, including potential future use by WSDOT for other projects. WSDOT has identified two potential points in time when it is reasonable to assume that a decision about the future use of the casting basin facility could be made: (1) at the completion of the SR 520 Pontoon Construction Project, and (2) if the decision is made to use the facility to build pontoons for the proposed I-5 to Medina: Bridge Replacement and HOV Project, at the end of pontoon construction for that project. Please see Chapter 1 of the FEIS under the heading "What would happen to the pontoon construction facility when the project is completed?" for more information on this topic.

I-005-001

one that minimizes the risk to the eco system here and is not operational for all that long. It has a short time for the build and then a short life for the fabrication.

Then it can be set aside. Meaning that it can stay idle, not have a carbon or other footprint, as it would have then served its intended purpose. Sure some say why not then use it as a ship repair dry dock, but there are other uses. For example why not look at eco uses for that graving dock, after it has served the purpose of the fabrication site. Now the preferred alternative (Aberdeen) has a favorable cost and void of low surface ancient artifacts. The no build only produces two, while we make eight at a time, so we do minimize that aspect.

Respectfully submitted,

Edward D Perrotti (505 North B Street, Aberdeen WA 98520)
BS, Engineering, Rensselaer Polytechnic Institute, Troy, NY
MS, Engineering, Rensselaer Polytechnic Institute, Troy, NY
MIT/HBS, Advanced Technologies Engineering Management

DRAFT EIS PUBLIC COMMENTS

My name is Edward D Perrotti. I live at 505 North B Street in Aberdeen, WA. My brief bio is attached, along with a summary section.

I hereby offer you the following comment set.

I-006-001

1. *Local Labor. They are very skilled and can tear apart a diesel engine and put it back together in no time. Please hire here as they are so good with working with their hands. Please look to that labor base here.*

I-006-002

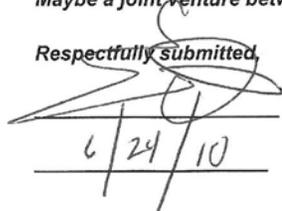
2. *Please set up a council to study what to do with this facility here after the SR 520 is completed. Perhaps it could have a multiple use versus a single use, in 2015, or after it has served the current purpose.*
3. *The facility may indeed serve as a basin or dock for carbon fiber composites in Grays Harbor. It could well serve to build the next generation materials (versus steel and aluminum) in a host of transportation systems. For example, build the next generation of WA State Ferries here, at this site in 2015, using carbon fiber composite technologies.*

Attached is a document that the WS DOT could use for this purpose. Please submit it to the US DOE and the US DOT for consideration.

Indeed we saw the SGL Group locate in Moses Lake, WA. This site could be ideal for the construction of marine vessels using advanced technologies.

Maybe a joint venture between Kiewit and the SGL group.

Respectfully submitted,



Edward D Perrotti

6/24/10
Date

I-006-001

WSDOT's contractor will consider the local labor base when assembling the workforce for the SR 520 Pontoon Construction Project.

I-006-002

Should one of the build alternatives be selected, there would be many options for the future use of the casting basin and support facilities, including potential future use by WSDOT for other projects. WSDOT has identified two potential points in time when it is reasonable to assume that a decision about the future use of the casting basin facility could be made: (1) at the completion of the SR 520 Pontoon Construction Project, and (2) if the decision is made to use the facility to build pontoons for the proposed I-5 to Medina: Bridge Replacement and HOV Project, at the end of pontoon construction for that project. Please see Chapter 1 of the FEIS under the heading "What would happen to the pontoon construction facility when the project is completed?" for more information on this topic.

The document included with your comment that you would like us to receive is part of your formal comment on the DEIS and is part of the public record. It is available to all agencies for their consideration as Appendix T to the FEIS, which is located on the project's website at <http://www.wsdot.wa.gov/Projects/SR520/Pontoons/default.htm>.

A Citizen's Perspective – The City Of Aberdeen

The Pros

The Downtown Corridor Begins When You Enter The City And That Part of Town Is Quite Busy

The work by John Yonich and his syndicate has produced the DNR theatre and of course more is needed

The new sidewalks add to a clean and safe environment and new ones going in will enhance the so called "Main Street"

The block that is one with the vacant buildings could be improved, by removing those structure that do not have structural integrity due to the Nisqually damage

*Those older buildings that are not unoccupied and safe, could well lend themselves to a new kind of space on that block.
Loft space.*

The model for that is what Jack Thompson did here, with a garage in back, enter through the alley way and have parking on the first floor, enclosed.

Then on the next floor above, two lofts, divide the space in half and make that a living space for people who like lofts – artists, musicians, etc.

The DNR then being that hub for those folks, to perhaps showcase works, in this main downtown corridor, where we have the blight.

The Cons

We did take a hit here, with the mill closures and have lost jobs, but more so, we lost the payrolls, the income here.

That can be offset somewhat, not completely by a new downtown with loft space.

Now we know that this was done in NYC, and they used the Tribeca art theaters to renew that downtown and today you see it on these web sites, like www.visitnyc.org.

We survived a lot here. That Morck, the Harbor Landing, the Think of Me Hill, but we can recover with a new jobs base.

I would think that this community can do this, but it does take heavy lifting and we have to avoid the pitfalls of the mining towns like Butte, MT.

The state has the EDC Commission and that web site and the City could benefit by looking at industrial sites and asking what could be located there.

It is not an easy task as it takes capital and a lot of it. I would say try to get clean industry here and I will attach a proposal that I did that could well be located in Aberdeen, WA.

A Proposal To The US Energy Department For A New Composite Fabrication
Plant To Be Located In Grays Harbor County.

Summary of Proposal

The facility will employ 50 to 250 workers in a county that has lost at least that many due to the closure of mills.

Funding would be in tranches. An initial \$500,000 for an office, hiring a staff, audit and legal firm, as well as new UW graduates and would be headed up by Edward David Perrotti (Duns # as awarded on July 10, 2009).

More about Ed below.

The materials would be composite, made of carbon, to be used instead of steel and aluminum in the marine as well as other industries (an example is high speed rail, ferries and trailers). At least 200 million tons of CO2 would be avoided annually (globally) as the process to make graphite sheets is less energy intensive by a factor of at least ten times.

Proposal Phases

Creation of a company under the RCW of the State of WA. Hiring of office staff under the direction of Edward David Perrotti. Additional application of \$5 million in federal grants for the site selection, engineering of the plant and hiring of the administrative team and mill supervisors.

We would hire young engineers from a variety of engineering schools to use CAD, CAM and CIM to optimize systems, methods and processes to find the best path to scale.

Finally an application for \$50 million to build and operate the facility during an initial two year start up period. This would be a demo plant to exhibit the technology base. What I call advanced technologies engineering management.

Carbon Process

Coal would be shipped in covered hopper cars by rail. The plant would pulverize the feedstock into fine powder. Plant output shipped by rail, truck and or vessel.

The powder would be used to make the composite materials. Large vats would serve

to turn the dust into dough like strands (in a closed and contained set of units, without hazard). The steps then include extrusion, and other processes, similar to the manufacture of veneer (strips and other thin layers), resin based layering and curing.

Here are a few links.

<http://www.google.com/search?hl=en&source=hp&q=carbon+fiber+composites&aq=f&og=&aqi=q4q-m2>

http://www.google.com/cse?cx=001967960132951597331:04hcho0_drk&cof=FORID:0&q=carbon+fiber+composites

www.visitraysharbor.com

Final forms include sheet and molded product. Stronger than tungsten and so much lighter (c.f. www.google.com with the search string The Rocky Mountain Institute and then carbon composite fabrication).

These engineered materials will be used in the next generation buses, motor homes, RV's, pleasure boats, yachts, rail cars, trailers (12 wheel and up), ferries and barges. Eventually to be used for other marine vessels.

Founder & CEO

Edward David Perrotti has a BS and MS in Engineering from RPI, Troy NY. His career has spanned five decades as a corporate executive and innovator. He has a set of white papers online that can be viewed, along with his CV, by using www.google.com and the search string Edward D Perrotti, no quotes.

Having worked for firms such as Texaco (in Alternative Energy) and Chase Bank (Venture Finance). His daughter, Dana, graduated AHS Class of 2004. Mr. Perrotti will work for \$1 a year and the firm would be non profit (perhaps an LLC) and employee owned.

Conclusion

He would only serve a five year term. Local audit and legal firms would be used. Worker hiring, job creation, would include training of labor (on the job). Mr. Perrotti would hire local firms for all functions, not outsourcing, unless under the directions of local prime contractor firms, such as Rognlins, or QBI.

Contracts would be done on a best bid basis by the WA State Labor Council would sit on the board (along with local retirees). Mr. Perrotti has lived in Aberdeen, WA for the past two decades and is a local retiree, having worked since 12.

He is willing to direct this effort, as the "Harbor" needs jobs and the mill workers here, that lost jobs

are the best fit for the fabrication of composite structures.

Very sincerely yours,

Edward David Perrotti
505 North B Street
Aberdeen, WA

eperrotti@netzero.com

PS Emails preferred over phone calls. Submitted as a competitive bid grant (a standalone NEWCO venture, a non profit LLC.

The name will be "The Grays Harbor Composite Technologies Company". Hereby copyrighted this day, July 11, 2009.

The trademark is GH EcoTech.

July 11, 2009

Edward David Perrotti

eperrotti@netzero.com

Education:

Rensselaer Polytechnic Institute
BS, Aeronautical Engineering 1969
MS, Management Science 1972

MIT & Harvard Business School
AMP, Executive Management Program 1974

Experience:

Philadelphia Electric Company 1969
Corporate Finance Dept.

Responsible for the development of new capital market financings for electric and gas utilities as well as energy capital equipment. Arranged debt and equity corporate offerings and created several original lease financing structures for use in power generating plant projects.

Industrial National Bank 1973
Vice President, Capital Equipment Finance

Pioneered the use of leverage lease financings in the utility and transportation industries. Lease financing structures for domestic and international carriers for DC10's, L1011's, 727's and 747's. Privately placed debt and equity offerings. Created innovative aircraft lease financing structures that employed joint venture partnerships with GE, GATX and the Bank of Tokyo. Expert in modeling equipment residual values and tax oriented lease optimization techniques.

Chase Manhattan Bank 1977
Vice President - Capital Markets Group

International capital equipment finance. Created the initial off balance sheet corporate financing arrangements for use in the international oil business. Developed the LTL structure as a means to facilitate the joint venture partnership financing of capital equipment sales. Developed multi-currency and cross border leverage lease financings for German capital equipment into offshore markets. Privately placed leverage lease equity and debt securities.

Texaco Inc 1981
Director - International Project/Marine Finance

Responsible for negotiating and documenting all lease financings of VLCC marine vessels, refineries and production facilities. Financings included the Cool Water gasification plant, the LOOP offshore facility, the Highlander project, the Pembroke refinery and cogeneration investments in the US. In addition, arranged lease agreements in the US, Europe and the Pacific (Caltex) with a variety of commercial and investment banks.

Promoted to President, Texaco Marine Financial Services with responsibility for global fleet financial management.

Deutsche Bank Capital Corp. 1987
Vice President, International Leasing Group

The structuring of multi-currency cross border tax oriented lease financings for capital equipment exported to the US. Work included the development of programs for Airbus, Daimler, Bombardier and Porsche. Devised a joint venture/partnership subsidiary for use by Messerschmitt in the financing of commercial helicopter sales in the US.

Other:

Instructor - US Naval War College, Newport, RI 1975

Partner - Expert Health Systems, C/S Technologies 1991

Instructor - The Naugatuck Valley Community Technical College, Waterbury, CT 1992

Co Founder & Advisor - Risk Analytics, LLC (Technology Planning Associates) 1994

Instructor – The Grays Harbor College, Aberdeen WA, 1997

Founder & Trustee, The Streams & Ponds Foundation, 2005

Founder & CEO – Energy Analytics & Systems Planning LLC, 2006

Author & Mentor:

Global Capital Markets – Global Investment Principles Under Conditions of Uncertainty

Capital Cross Border Equipment & Plant Financing – Taking The Asset Off The Books, But Not Out Of The Portfolio

Streams & Ponds – The Complete Guide To Sustained Wealth Creation & Retention

The WJ Clinton Centers for Education Excellence

The Washington State Finance Authority – The Guide to State Owned Investment Banks

The Manzo Marino Avellino Violante Perrotti Guide To World Famous Northern Italian Cuisine

Stochastic Monte Carlo Non Single Point Estimation Simulation To Determine Probabilistic Election Results

Single parent father of a gifted daughter, a 4.000 student at NYU and winner of the prestigious Leopold Schepp award and member of the President's club. Phi Beta Kappa and a candidate for a Fulbright in her senior year, 2007 to 2008. Summa Cum Laude grad in 2008.

Semi Finalist in the non defunct Virgin Earth Challenge \$25 million competition.

<http://www.nwcouncil.org/library/2008/2008-13comments/Perrotti.pdf>

www.nwcouncil.org/fw/budget/2007/draftrec/comments/risk.pdf

www.nwcouncil.org/library/2004/2004-2/perrotti.pdf

http://www.nwppc.org/energy/powerplan/6/view_comment.asp?id=765

<http://www.linkedin.com/pub/edward-david-perrotti/20/380/7aab>

broad material base. SGL Group's carbon-based materials combine several unique properties such as electrical and thermal conductivity, heat and corrosion resistance as well as high mechanical strength combined with low weight. Due to the paradigm shift in the use of materials as a result of the worldwide shortage of energy and raw materials, there is a growing demand for SGL Group's high-performance materials and products from an increasing number of industries. Carbon and graphite products are used whenever other materials such as steel, aluminum, copper, plastics, wood etc. fail due to their limited properties. Products from SGL Group are used predominantly in the steel, aluminum, automotive, chemical and glass/ceramics industries. However, manufacturers in the semiconductor, battery, solar/wind energy, environmental protection, aerospace and defense industries as well as in the nuclear energy industry also figure among the Company's customers.

With 43 production sites in Europe (23), North America (12) and Asia (8) as well as a service network covering more than 100 countries, SGL Group is a company with a global presence. In 2009, the Company's workforce of around 6,000 generated sales of €1.2 billion. The Company's head office is located in Wiesbaden/Germany. The North American headquarters are located in Charlotte/North Carolina.

The BMW Group

With its three brands – BMW, MINI and Rolls-Royce – the BMW Group is one of the world's most successful premium manufacturers of cars and motorcycles. It operates internationally with 24 production sites in 13 countries and a global sales network with representation in more than 140 countries. During the financial year 2009, the BMW Group sold approximately 1.29 million cars and more than 87,000 motorcycles worldwide. The profit before tax for 2009 was euro 413 million, revenues totalled euro 50.68 billion. At 31 December 2009, the BMW Group had a workforce of approximately 96,000 employees. Long-term thinking and responsible action have long been the foundation of the BMW Group's success. Striving for ecological and social sustainability along the entire value-added chain, taking full responsibility for our products and giving an unequivocal commitment to preserving resources are prime objectives firmly embedded in our corporate strategies. For these reasons, the BMW Group has been sector leader in the Dow Jones Sustainability Indices for the last five years.

Important note:

This press release contains statements on future developments that are based on currently available information and that involve risks and uncertainties that could lead to actual results deviating from these forward-looking statements. The statements on future developments are not to be understood as guarantees. The future developments and events are dependent on a number of factors; they include various risks and unanticipated circumstances and are based on assumptions that may not be correct. These risks and uncertainties include, for example, unforeseeable changes in political, economic and business conditions, particularly in the area of electric steel production, the competitive situation, interest rate and currency developments, technological developments and other risks and unanticipated circumstances. We see other risks in price developments, unexpected developments relating to acquired and consolidated companies and in the ongoing cost optimization programs. It is not

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6/24/2010



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04-06-2010

SGL Group and BMW Group: New Carbon Fiber Plant to be Built in Moses Lake, WA

- US\$ 100 million investment for the initial phase of production
- 80 new jobs to be created in Moses Lake for the initial phase
- Green energy source is the critical decision factor

Seattle, April 6, 2010. SGL Group and BMW Group jointly announced today at an event in Seattle that their joint venture, SGL Automotive Carbon Fibers LLC, will build a state-of-the-art carbon fiber manufacturing plant in Moses Lake, WA. During the initial phase, US\$ 100 million will be invested and 80 local jobs will be created.

The new facility is an important element of both companies' strategy to commercialize viable manufacturing of ultra light weight carbon fiber reinforced plastics (CFRP) for use in future vehicle concepts. The fibers manufactured at Moses Lake will be used exclusively for BMW Group's upcoming Megacity Vehicle. In February of this year, BMW Group announced that this new vehicle for urban mobility – set to be launched before 2015 under a BMW sub-brand – will be assembled in Leipzig, Germany. Now, a key piece of the Megacity Vehicle has a base in the USA.

In line with BMW and SGL's leading roles in sustainable business operations, the decision to build the carbon fiber plant in Moses Lake was based primarily on the availability of renewable clean hydropower and competitive energy costs in the state of Washington. Favorable infrastructure conditions, existing utilities, a skilled labor force and ease of working with the local government were also contributing factors in selecting Moses Lake as the location.

"This new plant in Moses Lake is a milestone in the use of carbon fibers for large scale production in the automotive industry," said Robert Koehler, CEO SGL Group, "it will be the world's most cost efficient carbon fiber plant using state-of-the-art technologies.

This significant investment further underlines our commitment to the U.S., where we already operate carbon fiber and composite materials plants. The manufacture of carbon fibers is a core business for SGL Group and together with our partner BMW Group, we will ensure that carbon fibers play a revolutionary role in lightweight automotive construction."

"We consider carbon fiber a cutting-edge material. Our joint efforts will make sustainable mobility possible in urban environments. Acting sustainably is part of our corporate strategy. Our focus includes the whole value chain. Therefore, the energy

Information Tray

Please enter search word

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6/24/2010

demand for producing carbon fiber will come from environmentally friendly hydropower," said Friedrich Eichner, Member of the Board of Management, Finance, BMW AG. "Lightweight construction is a core aspect for sustainable mobility improving both fuel consumption and CO₂ emissions, two key elements of our EfficientDynamics strategy. With using CFRP components in our Megacity Vehicle, we take sustainable mobility a step further. By combining the know-how of SGL Group and our expertise in manufacturing CFRP components, we will be able to produce carbon fiber enhanced components in large volumes at competitive costs for the first time. This is particularly relevant for electric-powered vehicles such as the Megacity Vehicle".

The production of CFRP involves several work stages. The raw material needed to manufacture carbon fibers, a polyacrylonitrile (PAN) based precursor, will be produced by a joint venture between SGL Group and the Japanese company Mitsubishi Rayon (MRC) in Otake, Japan. In the next step, the facility in Moses Lake will convert the polyacrylic fibers into the actual carbon fibers. These fibers are then processed into light weight carbon fiber fabrics at a second joint venture site in Wackersdorf, Germany. The CFRP parts and components will then be made from these fabrics at the BMW Group Plant Landshut, Germany. The assembly of the Megacity Vehicle will take place at the BMW Group plant in Leipzig, Germany where currently a range of BMW 1 Series and the BMW X1 are being built.

SGL Group and BMW Group have cooperated for many years in the area of carbon fiber composites and have combined their core competencies to industrialize the automotive use of carbon fibers in a joint venture founded in October 2009.

SGL Group contributes its know-how in high performance materials and its experience with carbon fiber based materials. As the only European carbon fiber and composite materials manufacturer, the company covers the entire value chain. BMW Group contributes its know-how in light weight automotive design and manufacturing and draws on its many years of experience with carbon fiber reinforced components for the BMW M brand and its race cars.

The joint venture operates through two companies, one based in the USA (SGL Automotive Carbon Fibers LLC) and the other in Germany (SGL Automotive Fibers GmbH & Co KG). SGL Group holds 51% of the shares and the BMW Group 49%.

Sustainability and Recycling

Along the entire supply chain, ecological, social and economic aspects will be aligned. For this reason, the manufacture as well as processing of the carbon fibers and carbon fiber composites will be achieved with careful consideration to environmental resources. The Moses Lake production site will use hydropower as its eco-friendly energy source and processes are being developed to recycle carbon fibers and downstream composite materials.

About SGL Group – The Carbon Company

SGL Group is one of the world's leading manufacturers of carbon-based products. It has a comprehensive portfolio ranging from carbon and graphite products to carbon fibers and composites. SGL Group's core competencies are its expertise in high-



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Oct. 6, 2009 | Technology | Campus

UW's newly named 'Lamborghini Lab' brings composite parts to sports-car arena

Hannah Hickey hickeyh@u.washington.edu

A partnership between the University of Washington and the Italian sports-car company Automobili Lamborghini has been formalized, and the presidents of both organizations today attended the naming ceremony of the UW's Automobili Lamborghini Advanced Composite Structures Laboratory.

The UW is the first university in the country to collaborate with Lamborghini. The company has committed to provide substantial funding for lab equipment and support for UW undergraduate and graduate students.

"This partnership is a win-win situation," said Matthew O'Donnell, dean of the UW's College of Engineering. "It further establishes the Pacific Northwest as a leader in composites research, it funds equipment for a UW engineering lab and it provides students with valuable research experience that's directly tied to real-world applications."

The UW and Lamborghini have worked closely during the past two years. The UW lab has hosted Lamborghini engineers for month-long periods; UW faculty have traveled to Italy to conduct small classes on the fundamentals of composites design and certification; and the university has sent engineering graduate students for internships at Lamborghini's Bologna headquarters.

"Lamborghini remains committed to investing in its future, and advancing carbon fiber composite technologies is the key to achieving many of our goals," said Lamborghini president Stephan Winkelmann, who attended the ceremony. "The UW and its collaborations have enabled Automobili Lamborghini to proceed with confidence in the development of innovative, composite-intensive structures."

Composite materials are made up of distinct parts -- plywood, fiberglass and polyester are all composite materials. High-end industries are beginning to use materials such as carbon fiber combined with epoxy, itself a composite material, to build stronger and lighter components.

"Composites are no longer the future, they are the present of structural materials for anything that's high-performance, whether it's aerospace or golf clubs or sports cars," said lab director Paolo Feraboli, a UW assistant professor of aeronautics and astronautics.



enlarge

Automobili Lamborghini

Lamborghini's Murcielago LP 670-4 SuperVeloce, shown here, incorporates carbon composites in its floor, transmission tunnel and outer sills, for a total of roughly one third composite materials by weight. Event photos will be available Wednesday.

<http://uwnews.org/article.asp?articleID=52479>

6/24/2010

"Monolithic materials like aluminum just won't cut it anymore."

Feraboli, a native of Italy, earned his undergraduate degree in Bologna and worked at Lamborghini on composite materials in 2001 and 2002. He continued a relationship with Lamborghini while establishing the UW's Advanced Composite Structures Laboratory in 2007.

The lab's equipment includes a lightning-strike generator for simulated lightning strikes up to 100,000 amps; a drop tower for inflicting damage from foreign objects; a pneumatic crash sled capable of crushing full-size vehicle prototypes; and a high-speed video camera that can take 82,000 frames per second. Research focuses on short-term, industry-driven testing of new materials in scenarios such as bird strike, lightning strike or, in this case, crashes.

Lamborghini uses carbon fiber, a strong, lightweight composite material, in its new cars. The Murcielago LP 670-4 SuperVeloce incorporates carbon composites in its floor, transmission tunnel and outer skin, for a total of roughly one third composite materials by weight. Lamborghini says it plans to increase power-to-weight ratios of its cars by using composites to decrease the vehicles' overall mass, which also lowers carbon dioxide emissions.

For more than a decade UW aeronautics engineers have worked closely with the Boeing Co. to develop and test composite parts for the 787 Dreamliner. Testing for Lamborghini means exploring different questions, as well as having the flexibility to develop prototype parts in a shorter turnaround time, Feraboli noted.

Today's events at the UW, sponsored by Lamborghini, included speeches, test drives of Lamborghini cars and lab tours.

"Partnerships between the UW and industry leaders like Lamborghini give our students the advantage of working on real-world problems," said UW President Mark Emmert. "We are excited that UW researchers and Lamborghini engineers will be collaborating to bring innovative materials to the automobile industry."

###

For more information, contact Feraboli at 206-543-2170 or feraboli@aa.washington.edu.

RELATED CONTENT FROM UWNEWS.ORG

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Oct. 5, 2009

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6/24/2010

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6/24/2010

Draft EIS Public Hearing and Open House Comment Form – June 24, 2010

Please use this form to share your comments on the content provided in the Draft Environmental Impact Statement document. WSDOT will consider and respond to all comments received between May 28 and July 12, 2010. Thank you for your comments.

You can provide comments through one of the following methods:

- **Complete this form** and place it in one of the comment boxes during the meeting. Please write clearly.
- **Mail** our comments to Margaret Kucharski, Environmental Lead, SR 520 Pontoon Construction Project, 600 Stewart Street, Suite 520, Seattle, WA 98101.
- **E-mail** your comments to SR520Pontoons DEIS@wsdot.wa.gov.
- **Visit the Web page** at <http://www.wsdot.wa.gov/Projects/SR520/Pontoons/>

Name Jason Lake E-mail jlake@psd.wa.gov
Address 70'D St
City Hogiam State WA Zip 98550

These comments will become part of the public record for the SR 520 Pontoon Construction Project Draft Environmental Impact Statement. Personal information is voluntary and will become part of the public record if provided. The Washington State Department of Transportation is a public agency and is subject to the State of Washington's Public Records Act (RCW 42.56). Therefore, meeting comments may be made available to anyone requesting them for non-commercial purposes.

Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

I-007-001

This is a much need project for the economy of Grays Harbor County. I fully support the project, believe that Aberdeen Log yard is the right site, and can't wait for the process to start.

I-007-001

Thank you for your comment.

Draft EIS Public Hearing and Open House Comment Form – June 24, 2010

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- **Mail** our comments to Margaret Kucharski, Environmental Lead, SR 520 Pontoon Construction Project, 600 Stewart Street, Suite 520, Seattle, WA 98101.
- **E-mail** your comments to SR520Pontoons_DEIS@wsdot.wa.gov.
- **Visit the Web page** at <http://www.wsdot.wa.gov/Projects/SR520/Pontoons/>

Aberdeen City Council

Name Alicia Phelps E-mail _____
Address 1100 Foregate
City Aberdeen State WA Zip 98520

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Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

I-008-001

The only thing is I am glad you are still looking to do this project in Grays Harbor.

I-008-001

Thank you for your comment.

Draft EIS Public Hearing and Open House Comment Form – June 24, 2010

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- **E-mail** your comments to SR520Pontoons_DEIS@wsdot.wa.gov.
- **Visit the Web page** at <http://www.wsdot.wa.gov/Projects/SR520/Pontoons/>

Name Tom Quigg E-mail _____
Address 101 South Broadway
City Aberdeen State WA Zip 98520

These comments will become part of the public record for the SR 520 Pontoon Construction Project Draft Environmental Impact Statement. Personal information is voluntary and will become part of the public record if provided. The Washington State Department of Transportation is a public agency and is subject to the State of Washington's Public Records Act (RCW 42 56). Therefore, meeting comments may be made available to anyone requesting them for non-commercial purposes

Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

I-009-001

I see nothing in the report that would
cause me to withhold support of the
project.

I-009-001

Thank you for your comment.

Draft EIS Public Hearing and Open House Comment Form – June 24, 2010

Please use this form to share your comments on the content provided in the Draft Environmental Impact Statement document. WSDOT will consider and respond to all comments received between May 28 and July 12, 2010. Thank you for your comments.

You can provide comments through one of the following methods:

- **Complete this form** and place it in one of the comment boxes during the meeting. Please write clearly.
- **Mail** our comments to Margaret Kucharski, Environmental Lead, SR 520 Pontoon Construction Project, 600 Stewart Street, Suite 520, Seattle, WA 98101.
- **E-mail** your comments to SR520Pontoons_DEIS@wsdot.wa.gov.
- **Visit the Web page** at <http://www.wsdot.wa.gov/Projects/SR520/Pontoons/>

Name Fred Rapp E-mail Fred@reachone.com
Address Box 270
City ELMA State WA Zip 98501

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Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

I-010-001

It seems silly to go through this huge project and only use it for 520. Kingsley Hall, an engineer on I-5 many years ago - says the best solution to the mess in Seattle would be a floating bridge on Elliott Bay from Alkiway Island

I-010-001

Thank you for your interest in the project and your comment. Should one of the build alternatives be selected, there would be many options for the future use of the casting basin and support facilities, including potential future use by WSDOT for other projects. A decision on the fate of the property beyond the Pontoon Construction Project will be made at a later time. WSDOT has identified two potential points in time when it is reasonable to assume that a decision about the future use of the casting basin facility could be made: (1) at the completion of the SR 520 Pontoon Construction Project, and (2) if the decision is made to use the facility to build pontoons for the proposed I-5 to Medina: Bridge Replacement and HOV Project, at the end of pontoon construction for that project. Please see Chapter 1 of the FEIS under the heading "What would happen to the pontoon construction facility when the project is completed?" for more information on this topic.

At this time, WSDOT is not considering a project to build a floating bridge across Elliott Bay.

Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement? (continued from Page 1)

I-010-001

*To the green area area -
It would divert a lot of the impact
of traffic in the downtown corridor!*

I-011-001

1 MR. BROSMAN: I seem to have become a de facto
2 spokesman for the handicapped locally because I've made
3 a few points in filing ADA complaints with local
4 entities.

5 For that reason, I keep hearing things from
6 these people that the rest of us don't think about.
7 There appear to be many, many obstacles to the use of
8 the sidewalks locally by these people.

9 One lady tells me that coming from Myrtle
10 Street, the dividing point between Hoquiam and Aberdeen,
11 she has seven different places where she must go in the
12 street on a state highway because the state, WSDOT, has
13 not seen fit to put in curb cutouts at the appropriate
14 locations, and I know right now, there are some of those
15 curb cutout projects going on right now.

16 However, it appears that the project is not
17 complete and will not cover all areas to give a clear
18 line of traffic for a wheelchair user from, say, the
19 edge of Hoquiam all the way to Aberdeen City Hall. The
20 City of Aberdeen claims that they have no interest in
21 this because this is a state problem.

22 I don't care whether it's a state problem or an
23 Aberdeen problem. I will probably have to file a
24 federal action against you people about the time that
25 you're getting ready to do this project if you can't

6

Capitol Pacific Reporting, Inc. (800) 407-0148

I-011-001

Thank you for your comment. This project is not affecting sidewalks or curbs. Therefore, no sidewalk improvements, including curb cuts are proposed.

1 take care of this before you start putting all those
2 additional trucks on the road.

3 You're going to have to contend with a Federal
4 Department of Justice complaint for the ADA infraction
5 that has been long-standing. ADA, if you look our your
6 calendar watch, you can look at it and you say, "Well,
7 gee. We're 20 years late."

8 It was 20 years ago this month that ADA was
9 passed. I'd like for you to go in the intersection of
10 Alder and Wishkah and take a look and see how many times
11 that surface has been resurfaced by the State or the
12 City, somebody, and even though you have done the
13 repairs, you still haven't put the curb cutouts.

14 Take a look at the route that you're suggesting,
15 and think about what's in store for you if you can't fix
16 it. Thank you.

I-012-001

1 As you get up, will you just state your name so
2 that the court reporter --
3 MS. MOORE: I'll go write it down on your form.
4 MR. BERMAN: Oh, it's okay. You can just --
5 MS. MOORE: Do you know how to spell my name?
6 MR. BERMAN: Oh, yeah. All right. Janis Moore,
7 M-o-o-r-e.
8 MS. MOORE: Yeah. Make sure you get that
9 J-a-n-i-s in there.
10 MR. BERMAN: Okay.
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I-012-001

Should one of the build alternatives be selected, there would be many options for the future use of the casting basin and support facilities, including potential future use by WSDOT for other projects. WSDOT has identified two potential points in time when it is reasonable to assume that a decision about the future use of the casting basin facility could be made: (1) at the completion of the SR 520 Pontoon Construction Project, and (2) if the decision is made to use the facility to build pontoons for the proposed SR 520, I-5 to Medina: Bridge Replacement and HOV Project, at the end of pontoon construction for that project. Please see Chapter 1 of the FEIS under the heading "*What would happen to the pontoon construction facility when the project is completed?*" for more information on this topic.

1 MS. MOORE: I didn't really come planning to say
2 anything. I live in McCleary, and I have been familiar
3 with WSDOT work since about 1993.

4 And as an agency of the state, when so many
5 people have agencies to criticize, I find WSDOT have an
6 outrageous amount of responsibility and the tasks that
7 they have to do and the planning and everything. And,
8 of course, the more I drive through the parking lot that
9 I call I-5, all the things going on during the summer
10 construction is quite challenging.

11 I was impressed with the material downstairs. I
12 am hoping that it's all going to be on the web site for
13 people who were not able to come tonight, but one of the
14 things that I noticed was talking about what to do with
15 the facility after the pontoons are built, when you pick
16 up your tepees and you head back into the sunset again.

17 I think it's an important thing for Grays Harbor
18 County, for continuity, and I notice that one of the
19 options that you have on that is what can you do, you
20 know, when you take it away, take your project away,
21 what are you going to leave behind?

22 And, hopefully, I'm just putting in a very
23 strong vote for something, some emphasis on that.
24 Because as Fred said, The Harbor is always in need of
25 jobs and places for people to work. And the more you

I-012-001

1 can do to keep a facility open once you've done all the
2 things that I'm sure you're going to have to do for the
3 pontoon project, like electrical and plumbing and all
4 that, it's going to be retrofitted and in wonderful
5 shape to do some other kind of an industry, so I'd like
6 to put a strong vote for a solid future with that
7 project. Thank you.

I-013-001

1 MR. RAPP: Right. Well, I wanted to commend
2 you. In the research and analysis that you've done
3 here, it looks like from the traffic map that we see
4 there, that it would be the least amount of disruption
5 to the traffic, to the Aberdeen site.

6 We certainly appreciate the fact that you're
7 planning on building these pontoons here and that The
8 Harbor nearly always needs more jobs. I think we run
9 one of the highest unemployment rates of any place in
10 the state.

11 And the Port has been doing well. They have
12 brought in many new businesses in the port, but, of
13 course, that's created more traffic. They're having to
14 deal a little bit with the railroad around the shopping
15 area on the east end of town because the trains are
16 running so -- currently I live in Elma. And the trains
17 make it almost impossible to get across town sometimes,
18 but we really do appreciate all the traffic. But we
19 thank you for the research and analysis that you're
20 doing. I think that your plan will go together, and the
21 disruption from the traffic will be as minimal as it can
22 be. I appreciate that.

23 MR. BERMAN: Thank you. So those are all the
24 people we have signed up. Can I coax anybody else to
25 spend a few minutes?

8

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I-013-001

Thank you for your comment.

I-014-001

1 MR. RAPP: You know, we have the Hood Canal
2 Bridge that's just been worked on. Well, we have I-90,
3 which has some floating sections in it, besides 520.
4 And the, as she mentioned, the highway is kind of a
5 parking lot, particularly Mondays and Fridays. I'd just
6 as soon stay at home those days.

7 But I'm just wondering if it isn't possible that
8 we could continue to make pontoons here to replace,
9 like, the I-90 bridge and, perhaps, another bridge.

I-014-002

10 There's an engineer that worked on I-5 in
11 Seattle when we were first putting it through Seattle
12 who has proposed a floating bridge in Elliott Bay, which
13 would be made of pontoons, also. And so it seems like
14 putting all the expense and time and effort and research
15 into this pontoon construction, it would be an
16 intelligent idea to try to relieve the traffic in the --
17 I don't know what you'd call it -- but the shape of
18 Seattle is such that you're never going to have good
19 flow of traffic without relieving some of it somewhere,
20 and perhaps the floating bridge in Elliott Bay would be
21 a good suggestion.

22 MR. BERMAN: Would anyone else, anyone that came
23 in late, like to sign up and take some time to speak
24 your mind in front of your peers and to Randy and Julie?

25 All right. Nobody. Anyone else? Well --

12

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I-014-001

Should one of the build alternatives be selected, there would be many options for the future fate of the casting basin and support facilities, including potential future use by WSDOT for other projects. It is possible that pontoons for other floating bridges could be built in the casting basin; however, WSDOT does not currently have any plans to construct pontoons for any other floating bridges.

I-014-002

Currently, WSDOT has three floating bridges in its fleet - the SR 520 Evergreen Point Bridge, the I-90 Lacey V. Murrow Memorial Bridge, and the SR 104 Hood Canal Bridge. WSDOT does not have any plans to place a floating bridge across Elliott Bay. It is possible that the casting facility in Grays Harbor would be available to build pontoons to repair the existing bridges.

From: SR520users@aol.com [mailto:SR520users@aol.com]
Sent: Monday, July 12, 2010 8:26 PM
To: SR 520 Pontoon Construction Project DEIS Comments
Subject: Comments on inadequacies of DEIS for State Route 520 pontoons

Sir or Madam:

I-015-001

The above-identified DEIS is legally and otherwise inadequate due to complete failures to identify ways and to analyze means by which all current alternatives have omitted essential considerations, entirely, as to the Washington State Department of Transportation's major-and-continuing misuses of 18th Amendment funds to finance engineering costs and other substantial expenses, up to and including this date, in order thereby to advance WSDOT's intentional violations of the Washington State Constitution's Article II, Section 40, in its said unconstitutional furtherances of significant monetary benefits for planned **nonhighway** facilities of and for planned **nonhighway** uses by the Central Puget Sound Regional Transit Authority (*i.e.* as WSDOT's former co-lead agency for its State Route 520 replacement programs) so as thus to facilitate that junior taxing district in its plans for future exploitation of the SR 520 corridor through WSDOT's unconstitutional misappropriations of millions of dollars in constitutionally restricted state funds (*i.e.* for light-rail services).

Additionally, these manipulations by WSDOT, as lead agency herein, and by Sound Transit, as its previous co-lead agency herein, implicate an ongoing conspiracy between said state agency and said junior taxing district in order to violate the Washington State Constitution both intentionally and also willfully by siphoning off millions of dollars of constitutionally restricted state funds, *i.e.* for unlawful purposes, through misfeasance in public office at common law by and among their respective public officers previously and presently.

Respectfully submitted.

Will Knedlik, Chairman
SR 520 Users Alliance

I-015-001

WSDOT, in consultation with the Washington State Office of the Attorney General, designs and constructs its projects within the mandate of all applicable federal, state, and local laws and regulations.



SR 520 Bridge Replacement and HOV Program

Pontoon Construction Project



SR 520 Pontoon Construction Project Draft EIS Comment Form

Please use this form to share your comments on the content provided in the Draft Environmental Impact Statement document. WSDOT will consider and respond to all comments received between May 28 and July 12, 2010. Thank you for your comments.

You can provide comments using one of the following methods:

- Complete this form.
- Mail your comments to Margaret Kucharski, Environmental Lead, SR 520 Pontoon Construction Project, 600 Stewart Street, Suite 520, Seattle, WA 98101.
- E-mail your comments to SR520Pontoons_DEIS@wsdot.wa.gov.
- Speak to a court reporter at public hearing and open house scheduled for 5 – 7 p.m., June 24, 2010 at Aberdeen High School, 410 North G St., Aberdeen WA, 98520.

1. Name	Curt Nelson	CommentDate:	5/28/2010 23:42
2. E-mail	drnelson1@verizon.net	Comment Source:	Online
3. Address:	16250 NE 80th St		
4. City:	Redmond		
5. State:	WA		
* 6. Zip Code:	98052		

7. Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

I-016-001

It looks like you are proceeding by the book, let's get this bridge built!

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I-016-001

Thank you for your comment. Please keep in mind that this project is not the SR 520 I-5 to Medina: Bridge Replacement and HOV Project, which would replace the Evergreen Point Bridge. Rather, this project would build enough pontoons to replace the Evergreen Point Bridge in its current configuration should a catastrophic failure occur.



SR 520 Pontoon Construction Project Draft EIS Comment Form

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- Speak to a court reporter at public hearing and open house scheduled for 5 – 7 p.m., June 24, 2010 at Aberdeen High School, 410 North G St., Aberdeen WA, 98520.

1. Name: Edward D Perrotti
2. E-mail: eperrotti@netzero.com
3. Address: 505 North B Street
4. City: Aberdeen
5. State: WA
* 6. Zip Code: 98520
CommentDate: 6/7/2010 18:52
Comment Source: Online

7. Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

My Final Comments On The Draft EIS.

I-017-001

Making Waves Only Over Turns The Ship In the almost three decades that I have resided here, as a person who owns his own home and having a daughter attend the local schools after the loss of her mom, here are a few tidbits.

The Harbor is indeed a good place to live and raise children. The public schools here are quite good and after my child attended AHS and graduated in 2004, she went on to graduate NYU in 2008 with honors. She then went to Spain to teach and now lives in Austin, Texas and she works there now as an ESL public school teacher in Math and Science.

But we do have challenges. The jobs here are scarce. They hire from outside the County and there are reasons for this. Perhaps one is that we do not have the skill base here, or perhaps those that have not lived here, will not make waves.

I have read the draft EIS for the pontoons. The project will create jobs and is a direct and indirect investment here. The project draft shows that the scheme uses power and that will help our PUD. The project has diagrams and it appears that it uses trucks. That helps as they have to use folks that have a CDL and we do that here at the GHC.

Now we have a new person at the GHCH and a new person at the EDC. We have a very good Port Director here and we have the RETC at Satsop and that ED there is quite good at what he does. The PDA ED is very able and very good at what she does.

So we have a team. We have a great crew at the local WorkSource GH office. My hope is that we all see this now. That if we are in the boat together and we are sitting next to one another, that we are

I-017-001

Thank you for your comments. Yes, it is expected that the project, if either build alternative is selected, would create some jobs, use power from local sources, and require trucking.

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- E-mail your comments to SR520Pontoons_DEIS@wsdot.wa.gov.
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1. Name Edward D Perrotti CommentDate: 6/7/2010 18:52
 2. E-mail eperrotti@netzero.com Comment Source: Online

I-017-001 | pulling together. Meaning that you pull forward and I pull forward, not you push and I pull, as all of that does is to make us go around in circles.

I-017-002 | There are risks though. One is litigation risk. We saw this at the County, where after we passed the County Growth Plan, some decided that the best way forward was litigation. Surely the pontoons face this, the mitigation is the no build alternative (please read that draft EIS). But that is the worst case, as the site is one that minimizes the risk to the eco system here and is not operational for all that long. It has a short time for the build and then a short life for the fabrication.

I-017-003 | Then it can be set aside. Meaning that it can stay idle, not have a carbon or other footprint, as it would have then served its intended purpose. Sure some say why not then use it as a ship repair dry dock, but there are other uses. For example why not look at eco uses for that graving dock, after it has served the purpose of the fabrication site. Now the preferred alternative (Aberdeen) has a favorable cost and void of low surface ancient artifacts. The no build only produces two, while we make eight at a time, so we do minimize that aspect.

Respectfully submitted,
 Edward D Perrotti (505 North B Street, Aberdeen WA 98520)
 BS, Engineering, Rensselaer Polytechnic Institute, Troy, NY MS, Engineering, Rensselaer Polytechnic Institute, Troy, NY MIT/HBS, Advanced Technologies Engineering Management

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I-017-002

WSDOT, in consultation with the Washington State Attorney General's Office, designs and constructs its project within the mandate of all applicable federal, state, and local laws and regulations. Please see Chapter 5 of the FEIS, Mitigation, for a discussion of mitigation for potential project effects.

I-017-003

Should one of the build alternatives be selected, there would be many options for the future use of the casting basin and support facilities, including potential future use by WSDOT for other projects. A decision on the fate of the property beyond the SR 520 Pontoon Construction Project will be made at a later time. WSDOT has identified two potential points in time when it is reasonable to assume that a decision about the future use of the casting basin facility could be made: (1) at the completion of the SR 520 Pontoon Construction Project, and (2) if the decision is made to use the facility to build pontoons for the proposed SR 520, I-5 to Medina: Bridge Replacement and HOV Project, at the end of pontoon construction for that project. Please see Chapter 1 of the FEIS under the heading *What would happen to the pontoon construction facility when the project is completed?* for more information on this topic.



SR 520 Pontoon Construction Project Draft EIS Comment Form

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- E-mail your comments to SR520Pontoons_DEIS@wsdot.wa.gov.
- Speak to a court reporter at public hearing and open house scheduled for 5 – 7 p.m., June 24, 2010 at Aberdeen High School, 410 North G St., Aberdeen WA, 98520.

1. Name: Edward David Perrotti
 2. E-mail: eperrotti@netzero.com
 3. Address: 505 North B Street
 4. City: Aberdeen
 5. State: WA
 * 6. Zip Code: 98520
 CommentDate: 6/4/2010 22:41
 Comment Source: Online

7. Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

I-018-001

Thank you for the opportunity to comment.

The only thing I feel that is noteworthy is the risk of litigation. Now we had this happen to the County, where the County Growth Management Plan was taken into court by the tribes and the environmental groups. The law under which you have to prepare the EIS is quite certain and does not require you to evaluate the risk of the preferred alternative and second being taken into court after you have reached the point of decision and then have the permits.

At that time the lawyers for the groups that would wish to block this here would then file. This happened here after the County Commission voted and the plan was law. Now it is tied up in court.

The risk of this is somewhat mitigated by the no build case, where you use the CTC site in Tacoma.

At this time I feel the project should be at the Aberdeen site basis the costs and the lack of tribal artifacts at this location. The work done to mitigate the environmental risks is quite good and all should read the document at your web site. It is very thorough and adequate. The information is necessary and sufficient given the provisions of the National Environmental Act.

I hope that this is not litigated and my interest is to say, perhaps the tribes and environmental groups would comment favorably at the upcoming AHS meeting on June 24. If they have issues that are contentious please ask them to voice that set of concerns.

Perhaps rather than litigate after you have all of the permits in hand after your decision and my understanding is that Aberdeen is the best of the three, that these parties could be given something, quid pro quo, in return. This was not in the study and it is not required, but there may be a risk of litigation after the point of decision, after the permits are in hand.

I-018-001

WSDOT has coordinated with regulatory agencies and tribal nations, and has considered comments from the general public in designing the project and identifying potential mitigation measures.

During the 45-day comment period for the Draft EIS, there were multiple ways for people to provide comments. WSDOT launched a public outreach campaign during the comment period, advertising the release of the document and encouraging the public to comment on the Draft EIS. At the environmental hearing on June 24, 2010 at Aberdeen High School, the public could comment in any of the following methods:

- Complete a written comment form.
- Speak to a court reporter individually.
- Provide public testimony recorded by a court reporter.

WSDOT encouraged all hearing attendees to provide comments on the project and the Draft EIS. In total, WSDOT received 32 unique comment submittals on the Draft EIS.

These public, agency, and tribal coordination efforts are meant to bring to the foreground potentially contentious issues early in the environmental process, thereby avoiding litigation later on. However, beyond these coordination measures, WSDOT is unable to control whether litigation occurs or not.

WSDOT, in consultation with the Washington State Attorney General's Office, designs and constructs its project within the mandate of all applicable federal, state, and local laws and regulations. Please see Chapter 5 of the FEIS, Mitigation, for a discussion of mitigation for potential project effects.

SR 520 Pontoon Construction Project Draft EIS Comment Form

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1. Name: Edward D Perrotti
 2. E-mail: eperrotti@netzero.com
 3. Address: 505 North B Street
 4. City: Aberdeen
 5. State: WA
 * 6. Zip Code: 98520

CommentDate: 6/1/2010 21:26
 Comment Source: Online

7. Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

- I-019-001** | How did you arrive at the indirect job count?
 - I-019-002** | Could you please break ou the indirect job count by job category?
 - I-019-003** | How will the decision to pick the preferred alternative benefit all here, please provide a brief statement as to the qualitative benefits to the tribes, the locals and the state, for example the cost is less at the Aberdeen site (prefered)?
- Thank you.

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I-019-001

The indirect jobs estimates were prepared using an estimation factor developed by the Washington State Office of Financial Management's Input-Output Model. The project's estimated direct employment numbers were multiplied by the indirect job estimation factor to produce the indirect job estimates presented in the DEIS.

I-019-002

WSDOT cannot provide a break-out of indirect job estimates by job category because the model used to estimate indirect employment does not include factors for specific industries. For this reason, indirect employment estimates are presented as one number.

I-019-003

Chapter 2, Project Alternatives, in the Final EIS has a heading called *Why was Aberdeen Log Yard selected as the Preferred Alternative?*. Please see this section's discussion of the key factors that support the preferred alternative selection.



SR 520 Pontoon Construction Project Draft EIS Comment Form

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- E-mail your comments to SR520Pontoons_DEIS@wsdot.wa.gov.
- Speak to a court reporter at public hearing and open house scheduled for 5 – 7 p.m., June 24, 2010 at Aberdeen High School, 410 North G St., Aberdeen WA, 98520.

1. Name: Anthony Wiegering
2. E-mail: wiegering@gmail.com
3. Address: 10037 13th Ave NW
4. City: Seattle
5. State: WA
6. Zip Code: 98177-5213

CommentDate: 5/28/2010 20:38
Comment Source: Online

7. Do you have any comments on the SR 520 Pontoon Construction Project Draft Environmental Impact Statement?

I-020-001

I agree that this bridge needs to be changed! I have one huge complains about the documents that you have on your website to describe the changes. No page, nowhere in any of the docs talks at all about the bike path stuff. Every document about this project should show pictures of what the road sections will look like under whatever plan that is going to be build to make the plan that way. It is totally not fair at all to those of us who are most interested in this project by the path that it will be making for bikes. If there is not a path for bikes that is great enough for all of us, then this whole project and the money that will be spent is nothing more than a waste of time and money! I would consider it a crime to the public if there are not good enough bike paths on the new bridge!

You should have more information about what the bike path would do and how that will change the way for people to get there to work!

These comments will become part of the public record for the SR 520 Pontoon Construction Project Environmental Impact Statement. Personal information is voluntary and will become part of the public record if provided. The Washington State Department of Transportation is a public agency and is subject to the State of Washington's Public Records Act (RCW 42.56). Therefore, comments may be made available to anyone requesting them for non-commercial purposes.

I-020-001

Thank you for your comment. The SR 520 Pontoon Construction Project involves building 33 pontoons to replace the SR 520 Evergreen Point Bridge in its current configuration if the bridge were to fail. The SR 520 Pontoon Construction Project does not involve any design elements of the proposed new Evergreen Point Bridge.

The proposed design for the SR 520 bridge can be seen at <http://www.wsdot.wa.gov/Projects/SR520Bridge/brhpdesign.htm>. The design includes a 14-foot wide bicycle/pedestrian path across Lake Washington.

General questions and comments related to bridge design or bridge alternatives should be directed to the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. You may send comments through the project website

at: <http://www.wsdot.wa.gov/Projects/SR520Bridge/ContactUs.htm>

I-021-001

Gentlemen,

What a fine job you did with the sessions here at the GHC and the AHS were both informative and quite directive.

Please note that my interest was to give you that white paper and my hope is that you could share that with Paula Hammond and Cristine Gregoire.

I looked at that facility and asked what could it be used for in 2015 and beyond and basis what we see at the UW and what we see in Moses Lake, the SGL Group facility, perhaps your agency could go to the US DOE and the US DOT and seek funding for that special purpose.

The UW and SGL Group links.

<http://uwnews.org/article.asp?articleID=52479>

<http://uwnews.org/article.asp?articleID=52479>

The special purpose being using coal, not burning it, but to use it to make carbon fiber composite forms for the next generation of marine vessels, right here in Grays Harbor in the post pontoon era, circa 2015 and beyond.

http://www.google.com/search?hl=en&source=hp&q=carbon+fiber+composite+technologies&aq=f&aql=&aql=&oq=&gs_rfai=CZBEoc20mTNu4KJG2zQShl7C7CgAAAKoEBU_QWOcU

http://www.amazon.com/s/ref=nb_sb_noss?url=search-alias%3Dus-stripbooks-tree&field-keywords=carbon+fiber+composite+technologies

Indeed the US Navy and the US Coast Guard are both now testing designs where the use carbon fiber composites, both extruded, molded and panels to build out very stealthy hulls.

<http://www.defense.gov/>

Please take the ball and run with it and please take ownership as at 65 now, it is up to you younger engineers to make it so.

The spill in the Gulf will change all and we will use coal to make these frames and not burn coal. We will have these technologies in solar and wind and also CNG trucks and EV's.

I-021-001

Thank you for your suggestions about long-term plans for the pontoon construction facility in Grays Harbor. We value your input and will share them with WSDOT management for consideration as we move forward with design and planning. When the facility is no longer needed to build SR 520 bridge pontoons, WSDOT will determine its future use. Any future uses of the facility, including decommissioning, will require a new and separate environmental and permitting process with public input. WSDOT has identified two potential points in time when it is reasonable to assume that a decision about the future use of the casting basin facility could be made: (1) at the completion of the SR 520 Pontoon Construction Project, and (2) if the decision is made to use the facility to build pontoons for the proposed SR 520, I-5 to Medina: Bridge Replacement and HOV Project, at the end of pontoon construction for that project. Please see Chapter 1 of the FEIS under the heading *What would happen to the pontoon construction facility when the project is completed?* for more information on this topic.

I-021-001

http://www.google.com/search?hl=en&source=hp&q=compressed+natural+gas+as+a+truck+fuel&aq=f&aqi=&aql=&oq=&gs_rfai=C5_a1Bm8mTMrbD5aWMfmhxPkJAAA_AggQFT9AGfzQ

http://www.google.com/search?hl=en&q=electric+passenger+vehicles&aq=f&aqi=g1&aql=&oq=&gs_rfai=

<http://www.google.com/search?q=the+rocky+mountain+institute>

http://www.google.com/search?hl=en&q=the+national+energy+technology+laboratory&aq=0&aqi=g1&aql=&oq=the+national+energy+technology&gs_rfai=

http://www.google.com/search?hl=en&q=the+national+energy+renewable+laboratory&aq=f&aqi=&aql=&oq=&gs_rfai=

WE MUST MOVE OFF OIL.

Thank you all you did here, for us "good people".

Sir Edward David Manzo Marino Avellino Violante Perrotti

<http://www.linkedin.com/pub/edward-david-perrotti/20/380/7aa>

Cousin Dan played football and cousin Nancy Pelosi went into politics.