



## MEMORANDUM

**To:** SR 520 Program Files

**From:** Anthony Sarhan, FHWA Major Projects Oversight Manager;  
Allison Hanson, WSDOT ESO Mega Projects Environmental Director

**Date:** August 20, 2013

**Copies To:** Dave Becher, WSDOT SR 520 Floating Bridge & Landings Engineering Manager;  
Chris Brown, WSDOT SR 520 Floating Bridge & Landings Assistant Project Engineer;  
Margaret Kucharski, WSDOT SR 520 Environmental Lead;  
Rona Spelleccacy, SR 520 Environmental Planner

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**Subject:** SR 520, I-5 to Medina: Bridge Replacement and HOV Project –  
Pontoon Outfitting and Moorage at Port of Tacoma Terminal 7

The purpose of this memorandum is to document National Environmental Policy Act (NEPA), State Environmental Policy Act (SEPA), Endangered Species Act (ESA), and Section 106 and 4(f) compliance for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project associated with the use of the Port of Tacoma, Terminal 7 for pontoon outfitting and moorage activities.

Environmental documentation for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project includes the Final Environmental Impact Statement (June 2011) and supporting discipline reports, the Record of Decision (August 2011), SEPA Addenda (October and November 2011) NEPA Environmental Reevaluations (December 2011, January 2012, July 2012, October 2012, February 2013, and February 2013), and other memoranda. As the project proceeds with final design and construction, proposed modifications to design and delivery methods have been compared to findings in the Final Environmental Impact Statement (Final EIS), Record of Decision (ROD), and other existing reports and documentation.

The Final EIS states that as many as 23 pontoons would be outfitted with bridge and roadway structures at available port locations in Puget Sound. Outfitting was defined as the process by which the columns and elevated roadway of the bridge would be built directly on the surface of the pontoon. Outfitting activities were assumed to be consistent with typical operations at the port facilities, and could take up to 4 months.

In addition to outfitting, the Final EIS states that pontoons could be moored at these port locations until needed for construction of the floating bridge. Existing environmental documents stipulate that temporary storage of the pontoons be consistent with typical port facility operations, and no physical improvements be made to these port facilities. Temporary storage sites would be at existing commercial shipping or mooring facilities regularly used by barges or large vessels.

Consistent with these assumptions, WSDOT is proposing to outfit and temporarily moor pontoons at an existing facility within Puget Sound. Following pontoon casting at Grays Harbor or the Concrete Technology Corporation (CTC), outfitting activities and temporary moorage could occur at Terminal 7.

The Terminal 7 facility is an existing concrete/wood wharf owned by the Port of Tacoma. It is located at 2207 East 11<sup>th</sup> Street, Tacoma, WA, and is serviced by the Sitcum Waterway. Use of this site would be consistent with the above mentioned statements included in the Final EIS, and would support timely completion of floating bridge construction.

Pontoons would be towed to Terminal 7, where outfitting would begin as early as August 2013 and potentially last through 2015. Completed pontoons could be moored at Terminal 7 until space at the Lake Washington staging areas became available. Additionally, this moorage space could be used if pontoons are fabricated at a faster rate than can be cycled through the Lake Washington staging areas or incorporated into the final bridge configuration. Therefore, Terminal 7 could be used for outfitting activities or moorage of up to 30 pontoons. Outfitting and mooring a larger number of pontoons than were originally assumed in the Final EIS (23 pontoons) would not result in new significant impacts, since these activities are consistent with the existing use of the Terminal 7 facility.

#### **Port of Tacoma, Terminal 7**



Pontoon outfitting at Terminal 7 would occur directly on the top surface and interior of pontoons, using mobile equipment located on the wharf. Once outfitted, the pontoons would be moored until needed as part of the floating bridge construction sequence on Lake Washington, whereupon the pontoon would be towed to the Lake Washington staging areas or placed into the final bridge alignment. To support pontoon outfitting activities at Terminal 7, barge moorage, equipment storage, laydown areas, and parking would occur onsite.

Towing the pontoons to and from Terminal 7 would require up to two tugboats, a process similar to moving a barge or other large vessel. This type of activity regularly occurs within Sitcum Waterway and throughout Puget Sound as part of standard operations. Pontoon transport would follow existing shipping lanes and is consistent with the Final EIS.

No dredging is needed to support pontoon moorage at Terminal 7. The pontoon outfitting activities do not require in-water work and no physical improvements would be made to the existing facility. All concrete contact water associated with outfitting activities would be collected, contained, and pumped to temporary holding tanks on the wharf. The collected water would be disposed of at an offsite licensed facility, or discharged to a sanitary sewer with appropriate waste discharge permits. Appropriate best management practices would be implemented to ensure that no material, debris or concrete contact water would be released to the open water. A WSDOT Biologist has determined that use of Terminal 7 is consistent with the analysis included in the ESA consultations and no additional analysis is necessary for Endangered Species Act compliance.

Outfitting activities, moorage, and associated equipment staging would not require ground disturbing activities, and would not affect adjacent historic resources. A WSDOT Cultural Resources Specialist has determined that no additional analysis or consultation is necessary for Section 106 compliance or Section 4(f) compliance related to historic properties.

Though the Terminal 7 facility is located within the treaty fishing area of the Puyallup Tribe, the Tribe has indicated that additional coordination would not be necessary for the proposed activities at Port of Tacoma.

As documented above, the project remains compliant with current federal, state, local, and departmental regulations and directives with regard to NEPA/SEPA processes, Section 106 and 4(f), and the Endangered Species Act. No additional environmental review is required.

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We have reviewed and agree with the contents of this memorandum.

Region / Mode Official

AM SMITH

Date

8/20/13

FHWA Official

Anthony Larkin

Date

8/20/13