

Point Defiance Bypass Project

Point Defiance Shoreline Alternative Technical Memorandum

May 2011



Executive Summary

Purpose of the Technical Memorandum

The intent of a technical memorandum is to capture the reasons why an alternative should or should not be carried forward for analysis in a project's environmental documentation.

The purpose of this technical memorandum is to:

- Evaluate the Shoreline Alternative's practicality and feasibility from a technical, economic, and environmental standpoint under the Federal Railroad Administration's (FRA) National Environmental Policy Act (NEPA) regulations; and
- Determine whether the Shoreline Alternative will be carried forward for further evaluation in the Point Defiance Bypass Project (the project) Environmental Assessment.

WSDOT staff, which consists of a multi-discipline team assigned to the production of the project, has attempted to give as thorough of an analysis as required to achieve an impartial review. The projected or predicted impacts of this alternative have been measured against the baseline (the existing facility and surroundings, assuming the project is not built). This technical memorandum summarizes WSDOT's review.

Point Defiance Bypass: Purpose and Need

The purpose of the project is to provide more frequent and reliable high-speed intercity passenger rail service between Tacoma and Nisqually. The proposed work addresses a number of deficiencies in the existing rail alignment around Point Defiance. The project needs are to enhance rail service frequency, reliability, efficiency, and safety. The existing alignment, shared with rail traffic, is near capacity and is unable to accommodate additional high-speed intercity passenger rail service without substantial improvements. In addition, the existing alignment has physical and operational constraints adversely affecting both passenger and freight train scheduling and reliability.

Description of Project Alternative

The Shoreline Alternative would make improvements within the 26 mile-long existing route between Nisqually and Tacoma. See Appendix B for the route location.

The Shoreline Alternative consists of adding eight miles of new track and re-aligning 15 miles of existing track. The Shoreline Alternative adds a third track inland along the existing route between milepost 3.22 near Old Town Tacoma and milepost 10 near Titlow Park. The third track would also have a parallel access road. All the curves between Old Town Tacoma and south of Nisqually will be realigned to accommodate 79 mph passenger train speeds.

Conclusion

Although the Shoreline Alternative can meet the project purpose and need, it creates the following challenges and obstacles:

- Rail congestion would continue due to passenger and freight sharing the same right of way.
- Substantial amounts of right of way acquisitions from multiple owners and businesses would result in additional costs and schedule delays.
- Significant cost and schedule impacts from elimination or relocation of a boat moorage and pleasure boat-related business.
- Considerable added cost resulting from 1.7 million cubic yards of excavation including 100 acres of clearing and grubbing.
- Impact aesthetics along the shoreline due to more than six miles of retaining walls and the vast amount of excavation required.

The Shoreline Alternative proposes to fill in nearly three miles of shoreline, and would impact approximately 1.9 acres of wetlands. If these wetlands rated as a Category I (*i.e., highest-functioning wetlands*), mitigation costs could reach into the millions, and it would likely take a year or longer to acquire permits from multiple governmental jurisdictions.

The Shoreline Alternative is located within the Central Pierce County sole source aquifer, and the Pierce County critical aquifer recharge area. The recharge area is in close proximity to wellhead protection areas. If a project violates state or federal drinking water regulations, it cannot receive any federal funds.

The Shoreline Alternative impacts portions of the Nisqually National Wildlife Refuge along with several publicly owned parks, and prehistoric and historic archaeological sites/resources, some of which could be eligible for the National Register of Historic Places. These resources are protected under Section 4(f), 49 U.S.C. 303, of the Department of Transportation Act. Section 4(f) resources cannot be impacted if a feasible and prudent alternative exists that would avoid Section 4(f) resources.

Recommendation

Staff's recommendation is that the Shoreline Alternative be **eliminated** from further analysis.

WSDOT staff considers this alternative both impractical and unfeasible from a technical and economic standpoint, and will describe it as such in the project Environmental Assessment (EA). Because of the Shoreline Alternative's technical and environmental constraints and its high cost (\$1.42 billion to \$1.64 billion), WSDOT does not intend to study this alternative in detail within the project's EA, unless new information becomes available that would change these findings.

The Shoreline Alternative has more potentially significant impacts than the bypass alternative, while the bypass alternative has fewer potentially significant impacts, and better fulfills the project's purpose and need. Project characteristics evaluated under the *Engineering and Feasibility* and *Environmental Impacts* sections of this technical memorandum explain the reasons for recommending the elimination of this alternative.

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Introduction

Purpose of the Technical Memorandum

The intent of a technical memorandum is to capture the reasons why an alternative should or should not be carried forward for analysis in a project's environmental documentation.

The Federal Railroad Administration's (FRA) National Environmental Policy Act (NEPA) regulations state that the process of considering environmental impacts "should begin by identifying all reasonable alternatives to the proposed action, including 'no action' and including mitigation measures not incorporated into the design of the proposed action."

The Council on Environmental Quality describes "reasonable" alternatives as those that are practical or feasible from the technical or economic standpoint and use common sense rather than simply desirable from the standpoint of the applicant.¹

NEPA regulations go on to state "It is entirely proper that the number of alternatives being considered should decrease as the environmental consideration process proceeds and as analysis reveals that certain alternatives would in fact be unreasonable." For alternatives eliminated from further study, a project's environmental documentation must "briefly discuss the reasons for their having been eliminated"². Accordingly, this technical memorandum will be appended to the Point Defiance Bypass Project's Environmental Assessment (EA) and become a part of the permanent project record.

The purpose of this technical memorandum is to:

- Evaluate the Shoreline Alternative's practicality and feasibility from a technical, economic, and environmental standpoint under NEPA regulations
- Determine whether the Shoreline Alternative will be carried forward for further evaluation in the project EA

WSDOT staff, consisting of a multi-discipline team assigned to deliver this project, has attempted to provide the required level of analysis to achieve an impartial review. The projected or predicted impacts of this alternative have been measured against the baseline (the existing facility and surroundings, assuming the project is not built). The following information summarizes this review.

Point Defiance Bypass: Purpose and Need

The purpose of the project is to provide more frequent and reliable high-speed intercity passenger rail service between Tacoma and Nisqually. This project addresses the deficiencies in the existing rail alignment around Point Defiance. The project needs are

¹ Forty Most Asked Questions Concerning CEQ's NEPA Regulations

² Council on Environmental Quality Regulations, Sec 1502.14(a)

to enhance rail service frequency, reliability, efficiency and safety. The existing alignment, shared by freight and passenger rail traffic, is near capacity and is therefore unable to accommodate additional high-speed intercity passenger rail service without substantial improvements. In addition, the existing alignment has physical and operational constraints that adversely affect both passenger and freight train scheduling and reliability.

Specific elements of the project needs include:

- Enhanced frequency: Increase Amtrak *Cascades* round-trips from four to six by 2017 in order to meet projected service demands.
- Enhanced efficiency: Enhance the efficient movement of people by reducing the amount of time passenger and freight trains spend yielding to other freight movements.
- Improved reliability: Reduce or eliminate passenger rail service interruptions caused by natural factors (e.g., landslides) or operational limitations (e.g., drawbridge closures).
- Improved safety: Construct at-grade crossings with upgraded safety features including wayside horns, median barriers, advanced warning signals, and traffic signal improvements.

Description of Shoreline Alternative

The Shoreline Alternative would make improvements to the existing route between Nisqually and Tacoma. It consists of adding 8 miles of new track and re-aligning 15 miles of existing track. The Shoreline Alternative adds a third track inland along the existing route from Harbor (MP 3.22) to Titlow (MP 10.0). The third track will be located 25 feet center to center from the adjacent track and would have a 13-foot access road along side of it. All the curves between Harbor (MP 3.22) and south of Nisqually (MP 25.11) will be realigned to be 1 degree and 50 minute curves or broader to accommodate 79 mph passenger train speeds.

Figure 1 shows the location of both the Shoreline Alternative (shown in green) and the bypass route (shown in blue).

Included with the improvements would be clearing and grubbing, excavation, embankment, new track, new turnouts, bridge replacements, culvert extensions, retaining walls, a 1-mile-long tunnel, and other miscellaneous items.

The Shoreline Alternative would also involve right of way acquisition, residential relocations, commercial business impacts, and local road relocations.

Relationship between Bypass Route and Shoreline Alternative

In 2010, WSDOT evaluated the Shoreline Alternative because of comments from key stakeholders and municipalities within the project area.

The bypass route and Shoreline Alternative are similar in that they enhance frequency, improve reliability, and enhance efficiency. The alternatives differ in the location of the improvements. The bypass route is located inland in Pierce County, and extends roughly 20 miles from Freighthouse Square vicinity in Tacoma, through Lakewood and past DuPont to just east of I-5, where it connects with the BNSF main line (see Figure 1). Below is a summary of additional major differences between the two alternatives:

- 1) Currently, passenger trains are often delayed because they share tracks with freight trains. Even though the Shoreline Alternative proposes to add capacity, passenger trains will still share tracks with nearly all freight trains in the area. For the bypass route alternative, the traffic volume is light and consists almost exclusively of passenger trains. Unlike typical freight trains, passenger trains operate on detailed schedules that permit conflict-free on-time operation on single-track segments.
- 2) The bypass route reduces the rail distance between Seattle and Portland by 5.9 miles compared to the existing/Shoreline Alternative.
- 3) The Shoreline Alternative, including the proposed build out improvements will decrease travel time for passenger trains by 2-3 minutes and the bypass route will decrease it by approximately 6-10 minutes within this segment.
- 4) The Shoreline Alternative constructs a new third track for approximately seven miles. The bypass route upgrades an existing line for passenger train use.
- 5) The Shoreline Alternative will require the acquisition of a significant amount of right of way. Because the bypass route is in an existing track corridor, the right of way in general already exists.
- 6) The Shoreline Alternative extends along the shore of Puget Sound at the base of steep, heavily wooded hillsides, which are subject to mudslides, and fallen trees during the rain and windstorms that regularly occur from late fall through early spring. The bypass route is not generally subject to these problems since it is not located at the base of steep, heavily wooded hillsides.

Many different design variations could be analyzed. The substantial cumulative impacts of pioneering any new alignment through partially undisturbed lands and through heavily developed lands cannot be avoided. A new route adversely affects resources protected under Section 4(f) to a much greater magnitude than do other reasonable and prudent alternatives.

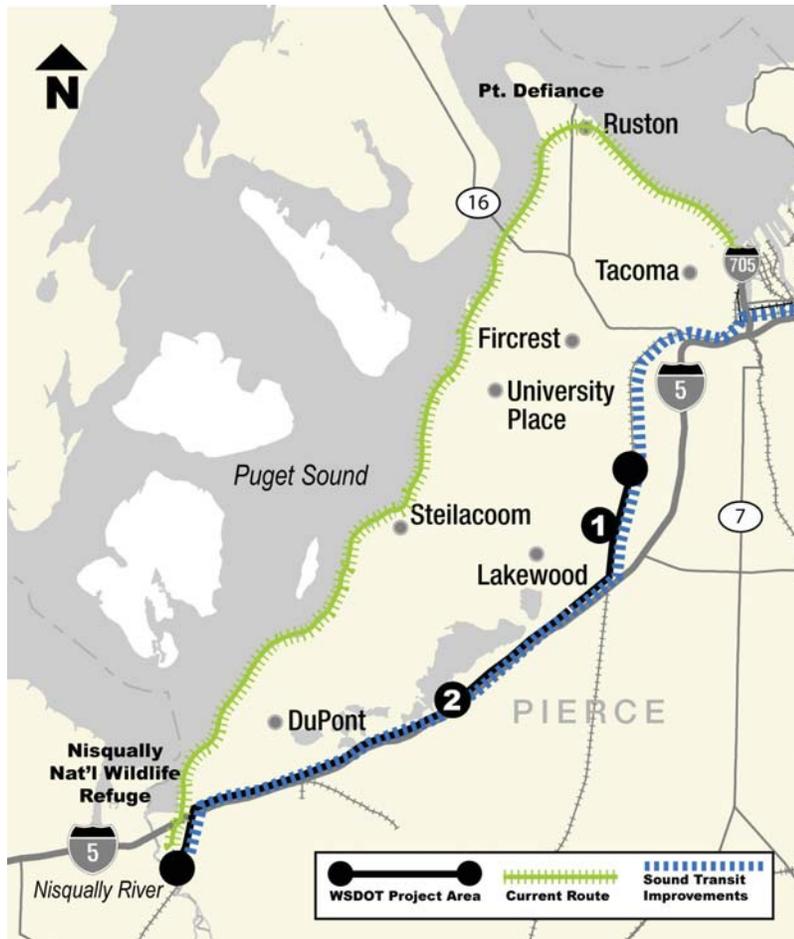


Figure 1

Engineering and Feasibility

The Shoreline Alternative concept was considered for the following reasons: 1) efficiency and 2) frequency.

Efficiency

With the construction of the third track and realignment of the curves associated with this alternative, the alignment would be able to accommodate 79 mph passenger train speeds. This would amount to a schedule reduction of 2-3 minutes within this segment.

Frequency

Construction of the third track and curve realignments will accommodate two additional daily Amtrak *Cascades* round-trips.

Geometrics

The proposed alignment of this alternative would follow the existing Point Defiance main line from Tacoma to Nisqually. This alternative would require removal of

approximately 1.7 million cubic yards of material and placing approximately 135,000 cubic yards of embankment. Excavation would require clearing and grubbing of approximately 100 acres. Because the existing cut slopes have localized instability issues, 2:1 slopes are used.

The required earthwork will increase the impacts to the project vicinity. An estimated 216 acres of land are displaced by the new footprint. The width of the footprint varies, and may be up to 420 feet across at the widest point.

Construction of the third track in Tacoma would require relocating Waterview Street from MP 3.22 to MP 5.07. This is due to the steep terrain between the existing two tracks and the street. Waterview St. provides access to multiple water view homes. An alternate access would need to be identified and evaluated.

Lemon Beach Road West (located to the south of Titlow Park from MP 10.61 to MP 11.09) requires relocation as well due to the curve realignment. This is due to the steep terrain in the area. An alternate access would need to be identified and evaluated.

Structures

This alternative would construct approximately 300 linear feet of bridge, 71.5 feet wide (three tracks) over Alderway St, N 40th St, and N 49th S. It will also construct approximately 800 linear feet of bridge, 46.5 feet wide (two tracks) over Chambers Cr. Waterway, a boat launch, 5th St. Waterway, and I-5(Northbound and Southbound).

One tunnel approximately 1 mile-long with a diameter of 39 feet would be required to the south of the existing Nelson Bennett Tunnel. The tunnel would be a two-track tunnel with walkways on each side. Boring a new tunnel of this size underneath a neighborhood presents many risks. Some of the potential structural risks include the suitability of the soil, the condition of the structures and buildings above the proposed tunnel alignment, acquiring the right of way needed, and cost.

This alternative would also require approximately 6.6 miles of retaining walls, ranging in height from 20-35 feet.

Right Of Way

This alternative would require right of way purchase of approximately 48 acres. This includes a 30 acre section of developed land costing approximately \$1,089,000 per acre. The required right of way includes the following types of purchases:

- Approximately 60 residential relocations including homes with Puget Sound views.
- A portion of Joint Base Lewis-McChord (JBLM).
- Chambers Creek Boat Owners Association. This would include the elimination of the moorage and pleasure boat-related business due to replacement of the bridge over the Chambers Creek Waterway. The moveable span would be eliminated with the bridge replacement to reduce delays to the trains.
- A portion of Chambers Bay Golf Club.

- Parcels owned by the City of Tacoma.
- City of Ruston – Ruston Playfield.
- A portion of the Nisqually National Wildlife Refuge
- Forest and parkland.

As part of the Shoreline Alternative right of way would be needed from select federal agencies including JBLM. Substantial time would be needed for compliance with applicable statutes and regulations specific to the agency before right of way would be granted. Depending on the agency, special documentation may be required and the right of way may be acquired as an easement rather than in fee (actually purchasing the land).

Beyond the areas identified as potentially affected by construction work, there may be other affected properties. Moving the railroad closer to homes or businesses could cause increased noise and vibration impacts. Steep slopes could cause instabilities in the slope as well. Geotechnical investigations would be needed to further analyze all of these effects.

Two areas that have the greatest potential impact to established neighborhoods are located just to the north and to the south of Steilacoom. One option to minimize this effect on the neighborhoods is to realign the rail alignment over the water. This would involve a structure (bridge) over Puget Sound that could be more than two miles long. There are many obstacles and issues involved with this option including but not limited to the following:

- Extensive and potentially lengthy permitting process including multiple permits from multiple jurisdictions.
- Extensive environmental impacts
- Extensive mitigation for environmental impacts
- Maritime impacts due to the presence of a ferry dock at Steilacoom
- Risks involved with the construction of a structure over the water
- Cost

These are just a few of the concerns involved with constructing a new structure over Puget Sound. The feasibility of this option is unknown, without further analysis. The risks involved with an undertaking of this kind are vast and could have a profound effect on the cost of this alternative.

Maintenance

The existing alignment extends along the Puget Sound shoreline at the base of steep, heavily wooded hillsides. Even with the required improvements, cut slopes and trees will still exist along the route. These hillsides are subject to mudslides and fallen trees during the rain and windstorms that regularly occur from late fall through early spring. Current required maintenance on the existing route will continue to some extent with the additional third track, even with the anticipated slope stability improvements.

Conclusion

The track improvements built as part of the Shoreline Alternative could result in a 2-3 minute schedule reduction within this segment, and would add capacity to the existing route.

However, this alternative also has major disadvantages. The cost of this alternative is extremely high (\$1.42 billion to \$1.64 billion) due to the vast amount of excavation needed on the steep slopes along the Puget Sound shoreline, as well as the construction of retaining walls, bridges, a tunnel, and other various items. The disadvantages also include significant federal, state, and private right of way purchases and continued maintenance concerns on the existing route. Without conducting a geotechnical investigation, it is impossible to determine whether this alternative is feasible due to the vast amount of ground disturbance associated with the earthwork, tunnel and potential new structure(s) over Puget Sound.

Environmental Impacts

This portion of the technical memorandum describes the Shoreline Alternative's likely impacts to the built and natural environment.

Resources

Air Quality

The Shoreline Alternative is within an area that must meet national air quality standards for ozone and carbon monoxide, and in proximity to an area that must meet standards for particulates.

During construction, dust particles would be released as a result of construction vehicles, equipment and wind erosion over exposed earth surfaces. Fugitive dust releases fine particles in the air, which is linked to respiratory problems, and generally constitutes the largest source of air quality concerns during construction. Most of the dust particles would settle out immediately adjacent to the construction areas while a small fraction would contribute to dust particle levels in the surrounding area. Air quality impacts caused by construction equipment emissions are short term and occur only when construction activities are taking place. Mitigation measures would be implemented to minimize construction emissions and impacts.

Hazardous Materials

Several hazardous material sites are located within 500 feet of the Shoreline Alternative. Additional studies would be necessary to avoid these sites or to determine

if any new sites exist. If any sites were located within an expanded right of way, WSDOT would likely be required to remediate the site(s).

Noise/Vibration

Noise: The Shoreline Alternative is approximately 25 miles long. Noise sensitive receptors within 500 feet of the route include the Nisqually National Wildlife Refuge, several publicly owned parks, schools, and homes. All receptor sites located along the proposed alignment would be subject to possible noise impacts.

Noise impacts could be reduced by initiating traffic management measures, acquiring land as buffer zones, realigning the rail route, insulating public use or nonprofit institutional structures (not residential or commercial buildings), or constructing noise barriers. Long-term noise impacts could negatively affect the Nisqually National Wildlife Refuge which would constitute a constructive use under Section 4(f) of the US Department of Transportation Act of 1966. The subsequent *Recreation/Section 4(f) and Section 6(f)* sub-section has additional information on how FRA is required to handle impacts to Section 4(f) resources.

Vibration: Because the Shoreline Alternative would travel through dense urban areas, a General Vibration Assessment would be required. If the general assessment determines that there are significant adverse vibration impacts, then a Detailed Vibration Assessment would be prepared.

Hydrology/Water Quality

The Shoreline Alternative will fill approximately 2.5 miles of Puget Sound shoreline and cross several unnamed waterbodies. One of these unnamed waterbodies is within ¼ mile of listed Washington State Department of Ecology 303(d) waterbodies (Balch and Cormorant Passages).

The Shoreline Alternative is within the Central Pierce County sole source aquifer,³ the Pierce County critical aquifer recharge area,⁴ and is in proximity to wellhead protection areas.⁵ WSDOT will need to work with the appropriate entities regarding appropriate protective and mitigation measures. Federal funds may not be expended unless a project is designed to avoid any violation of federal or state drinking water regulations.

It is unknown if the Shoreline Alternative would have a substantial impact on water quality or water resources at this time. Further study would be necessary to determine the extent of these impacts. The permitting process for approving shoreline fill is discussed in the following *Wetlands* sub-section.

³ Designated by the US Environmental Protection Agency

⁴ Designated by a city or county under the Growth Management Act

⁵ Group A systems (Washington State Department of Health) serving 15 or more residential connections, or 25 or more people per day for 60 days or more per year

Ecosystems

Fish, Wildlife, Vegetation

Approximately 48 acres (of which 30 acres are developed) would need to be acquired as right of way for the Shoreline Alternative, and approximately 100 acres would be cleared and grubbed. Some of this acreage is likely to be wildlife habitat, which would have a direct impact on wildlife.

Marbled murrelet has been documented within the corridor and is listed as a threatened species. Additionally, eight species of concern (bald eagle, osprey, pileated woodpecker, purple martin, reticulate sculpin, riffle sculpin, Vaux's swift, and western bluebird) have been documented within the corridor. Further study would be necessary to determine the impacts to fish, wildlife, and vegetation.

Endangered Species Act (ESA)

Unavoidable impacts to listed threatened species could occur if the Shoreline Alternative is constructed, and a Biological Assessment will be required to determine this alternative's impact on those species and their habitats. The timeframe for formal consultation under Section 7 of the ESA, for larger projects in the Puget Sound area, generally exceeds one year and may take up to two years to complete.

Mitigating for potential impacts to threatened or endangered species' habitat would require the creation or restoration of equivalent habitat near the project. The regulatory requirements and costs of such mitigation would depend on the final alternative alignment and the result of consultation with the regulatory agencies.

Wetlands and Shorelines

The preliminary design information available at the time of this analysis suggests that nine wetlands totaling approximately 1.9 acres may be impacted by the Shoreline Alternative. Further study would be necessary to determine the actual impacts to wetlands. Wetland impacts must be mitigated in accordance with federal, state, and local regulations.

Wetland impacts would be reduced to the greatest practicable extent by designing and implementing minimization and mitigation measures. However, for unavoidable impacts, the cost to mitigate is highly variable depending on the rating of the impacted wetlands (*Categories I-IV*), the type of mitigation implemented (*preservation, enhancement, and/or creation*), and the price of real estate. Construction costs and the

cost to subsequently monitor the mitigation site(s) (*up to 10 years or more*), are somewhat more stable and therefore can be predicted with a higher level of confidence.

Assuming all the wetlands identified during this analysis rated as a Category I (*i.e., highest-functioning wetlands*), the following two cost scenarios⁶ were developed:

1. The *lower cost* scenario, which would require a 3:1 creation/restoration ratio⁷ per Class I acre impacted and include a 150-foot buffer. Based on these requirements, a total of 5.7 acres would need to be constructed or restored at a cost of approximately \$1,464,000;^{8,9,10}
2. The *higher cost* scenario, which would require a 6:1 creation/restoration ratio⁷ per Class I acre impacted and include a 300-foot buffer. Based on these requirements, a total of 11.4 acres would need to be constructed or restored at a cost of approximately \$2,927,000.

These cost scenarios only address the cost of constructing the wetlands; they do not address the costs of locating and purchasing the real estate for these sites or their associated buffer areas.

These estimates would be refined only after accurately identifying wetland boundaries and assessing their functions and values. This would be accomplished by delineating and rating each wetland. It is also possible that additional wetlands could be discovered during the fieldwork, which would likely increase mitigation costs.

Approvals would be required from the following agencies:

- **US Army Corps of Engineers** – Section 404 of the Clean Water Act, which includes determining the Least Environmentally Damaging Practicable Alternative (LEDPA); Section 10 of the Rivers and Harbors Appropriation Act
- **WA State Department of Ecology** – Section 401 of the Clean Water Act; Coastal Zone Management Consistency Certification
- **WA State Department of Fish and Wildlife** – Hydraulic Project Approval
- **Local jurisdictions** – Shorelines; Floodplain Development; Critical Area Ordinances

Because of the many jurisdictions involved and the extent of shoreline impacts, acquiring the necessary approvals could take a year or longer.

⁶ Based on 2006 guidance, and input from Geoff Gray, SCR Biologist, on September 9, 2010.

⁷ The US Army Corps of Engineers determines creation/restoration ratios if a Section 404 Individual Permit is issued.

⁸ A total of \$256,784/acre. This total was inflated by 15% from the 2006 guidance of \$223,290/acre. The cost has been rounded to the nearest \$100,000 for the purposes of this analysis

⁹ This total does not include real estate acquisition costs

¹⁰ This cost does not include the area required for the buffer

Human Communities

Socioeconomic/Environmental Justice

The Shoreline Alternative could potentially impact approximately 60 private residences, private businesses, the Fort Lewis Military Reservation, and a municipal wastewater treatment plant. The 2009 poverty guideline for a family of four is \$22,050; within the study area, the median income is above the poverty guideline.

Average Median Income	Minority Population
\$44,482	27%

Further study is necessary in order to determine whether minority or low-income populations would be disproportionately affected.

Private residences and businesses would be displaced by the Shoreline Alternative. Any individuals or businesses that would be displaced as a result of implementing this alignment would be provided with relocation assistance under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (42 USC 4601).

Recreation/Section 4(f) and Section 6(f)¹¹

The Shoreline Alternative as currently designed would impact portions of the Nisqually National Wildlife Refuge and several publicly owned parks, which are Section 4(f) resources. Impacts could include increased noise levels, displacement and/or change in access.

Section 4(f), 49 U.S.C. 303, of the Department of Transportation Act states that the Federal Railroad Administration will not approve the use of land from a significant publicly owned park, recreation area, or wildlife and waterfowl refuge, or a prehistoric/historic site that is on or eligible for the National Register of Historic Places (NRHP), unless the determination is made that:

- 1) There is no feasible and prudent alternative to the use of land from the property;
and
- 2) The proposed action includes all possible planning to minimize harm to the property resulting from such use.

Supporting information demonstrates that there is a feasible and prudent alternative that would avoid these Section 4(f) resources. Because another alternative exists that does not impact Section 4(f) resources, the Shoreline Alternative should be considered and rejected.

¹¹ Property purchased with Land and Water Conservation Act funds

Historic/Cultural

Preliminary research indicates that the Shoreline Alternative would potentially impact 24 recorded prehistoric and historic archaeological sites/resources. Some of these sites/resources could be eligible for listing on the NRHP and could trigger a Section 4(f) analysis. Additionally, due to its age, the Washington Department of Archaeology and Historic Preservation may require that the rail line be evaluated as a historic property in order to determine its eligibility for the NRHP.

Section 4(f) of the Department of Transportation Act requires an analysis to show that there is no prudent and feasible alternative to using such a resource. If there is no prudent and feasible avoidance alternative, then WSDOT must demonstrate that the project includes all possible planning to minimize harm to the Section 4(f) resource. Historic/cultural sites and resources and their potential importance would require extensive study and consultation with agencies with jurisdiction and affected Indian tribes. This consultation could play a major role in developing or modifying this alternative. Excavations for data recovery and historic research would likely be needed for some of these sites/resources.

Section 106 of the National Historic Preservation Act would require any such impact to properties on or eligible for the NRHP to complete a 4(f) Evaluation. This process is discussed in the preceding *Recreation/Section 4(f) and Section 6(f)* sub-section.

Conclusion

Widening the existing BNSF rail corridor to include a third track would potentially impact the following:

- Section 4(f) resources such as the Nisqually National Wildlife Refuge and several publicly owned parks;
- Approximately 2.5 miles of Puget Sound shoreline;
- Wildlife habitat that supports threatened species;
- Approximately 60 private residences, private businesses, and a portion of Joint Base Lewis-McChord;
- Approximately 1.9 acres of wetlands;
- 24 cultural/historic resources;

See Appendix A for a summary of the environmental impacts.

Technical Memo Summary

The Shoreline Alternative meets the project purpose and need; however, there are many challenges and obstacles including the following:

- Rail congestion would continue due to passenger and freight sharing the same right of way.
- Substantial amounts of right of way acquisitions from multiple owners and businesses would result in additional costs and schedule delays.
- Significant cost and schedule impacts from elimination or relocation of a boat moorage and pleasure boat-related business.
- Considerable added cost resulting from 1.7 million cubic yards of excavation including 100 acres of clearing and grubbing.
- Impacts to aesthetics along the shoreline due to more than six miles of retaining walls and the vast amount of excavation required.

The Shoreline Alternative proposes to fill in nearly 2.5 miles of shoreline, and would impact approximately 1.9 acres of wetlands. If these wetlands rated as a Category I (*i.e.*, *highest-functioning wetlands*), mitigation costs could reach into the millions, and it would likely take a year or longer to acquire permits from multiple governmental jurisdictions.

The Shoreline Alternative is within the Central Pierce County sole source aquifer, the Pierce County critical aquifer recharge area, and is in proximity to wellhead protection areas. If a project violates state or federal drinking water regulations, it cannot receive any federal funds.

Staff Recommendation

Staff's recommendation is that the Shoreline Alternative be **eliminated from further consideration**.

WSDOT staff considers this alternative both impractical and unfeasible from a technical and economic standpoint, and will describe it as such in the project Environmental Assessment (EA). Because of the Shoreline Alternative's technical and environmental constraints and its high cost, WSDOT does not intend to study this alternative in detail within the project's EA, unless new information becomes available that would change these findings.

The Shoreline Alternative has more potentially significant impacts compared to the bypass alternative. The Point Defiance bypass alternative has fewer potentially significant impacts, and better fulfills the project's purpose and need. Project characteristics evaluated under the *Engineering and Feasibility* and *Environmental Impacts* sections of this technical memorandum explain the reasons for recommending the elimination of this alternative.

Appendix A – Comparison of Shoreline Alternative to Point Defiance Bypass Project

	Shoreline	Pt. Defiance Bypass ¹
Design		
Route Length between Freighthouse Square past DuPont to just east of I-5, where it connects with the BNSF main line	25.9 miles	20 miles
New/Reconstructed Track	8.0 miles/15 miles	2.5 miles/11.5 miles
Construction Cost ¹⁰	\$1.42B - \$1.64B	\$59.6M
Total ROW Required/ Residential ROW	48 acres/30 acres	1.3 acres/<1 acre
Potential Environmental Impacts		
Wetlands: Total Impacted ²	1.9 acres	0 acres
Wetlands: Mitigation Ratio ³ (3:1 ⁴ /6:1 ⁵)	5.7 acres/11.4 acres	N/A
Wetlands: Mitigation Cost ^{6,7} (3:1/6:1)	\$1.5M/\$2.9M	N/A
Socioeconomic/Environmental Justice: % Minority Population	27%	39%
Recreation/Section 4(f) ⁸ and 6(f): Resources Impacted	Yes	No
Historic/Cultural: Resources Impacted	24 sites	0 sites

Note: Since the information was the same for both alternatives, no information is being provided in this comparison table for Air Quality (*Attainment Area*), Hazardous Materials (*Sites Within 500 Feet*), Noise (*Sensitive Receptors*), Hydrology/Water Quality (*Proximity to Sensitive Surface or Ground Waterbodies*), or ESA (*Impacts to Threatened Species*). See the sub-section for more information.

¹ *Point Defiance Bypass Project Environmental Summary* (May 2008), and supporting discipline reports; the *Environmental Summary* analyzed only to S. 66th Street in Tacoma, which was the northern extent of the project at that time

² Assumes all the wetlands identified during this analysis rated as a Category I (*i.e., highest-functioning wetlands*)

³ The US Army Corps of Engineers determines creation/restoration ratios if a Section 404 Individual Permit is issued

⁴ The lower cost scenario, which would require a 3:1 creation/restoration ratio per Class I acre impacted and include a 150-foot buffer.

⁵ The higher cost scenario, which would require a 6:1 creation/restoration ratio per Class I acre impacted and include a 300-foot buffer

⁶ A total of \$256,784/acre based on 2006 guidance, and input from Geoff Gray, SCR Biologist, on September 9, 2010; this total was inflated by 15% from the 2006 guidance of \$223,290/acre and has been rounded to the nearest \$100,000 for the purposes of this analysis

⁷ This cost does not include real estate acquisition costs or the area required for the buffer

⁸ FRA will not approve the use of a Section 4(f) resource unless a determination is made that 1) there is no feasible and prudent alternative to the use of land from the property; and 2) the proposed action includes all possible planning to minimize harm to the property resulting from such use; supporting information demonstrates that there is a feasible and prudent alternative that would avoid these Section 4(f) resources

¹⁰ The Risk Self-Modeling Spreadsheet was used to perform risk-based estimating.

Appendix B – Route Location

