Chapter 6 Other Considerations and Next Steps

This chapter identifies irreversible and irretrievable commitments of resources that would occur with the project and the relationship between the proposed project’s short-term effects and long-term benefits. Key project milestones are listed through proposed project completion in 2014, and ongoing and next steps in the environmental compliance, design, and construction process are described for the duration of the SR 520 Pontoon Construction Project.

What irreversible and irretrievable commitments of resources would the project involve?

Constructing a new casting basin and pontoons would result in irreversible effects on wetlands and mudflats and irreplaceable use of materials and energy. Wetlands and mudflats would be irreversibly excavated and filled under both build alternatives. Proposed excavation and fill activities would also have irreversible effects on wetlands, upland habitat, and vegetation and could displace terrestrial species. Although compensatory mitigation for wetland effects would be provided at an offsite location, the onsite adverse effects would be considered irreversible. Effects on aquatic species would be limited to individuals and would not constitute an irreversible effect on any entire population.

Both Grays Harbor build alternative sites are currently developed as log sorting yards. Redeveloping either Grays Harbor site to an operational casting basin facility would be an irreversible commitment. The construction materials and human effort required to construct the proposed new casting basin and pontoons would be irretrievable. Materials would include—but would not be limited to—aggregate used to make concrete; steel for piles, rebar, and pontoon forms; oil used to make asphalt; and wood for piles and forms. WSDOT does not anticipate any shortage of these materials resulting from the SR 520 Pontoon Construction Project.
What would be the relationship between the project’s short-term effects and long-term benefits?

To determine whether the proposed project’s long-term benefits warrant the short-term effects, this section compares short-term effects and uses of resources with the long-term benefits. For this assessment, ‘short-term’ refers to time required to build the casting basin facility and the pontoons needed for the proposed SR 520 Pontoon Construction Project and the potential use of the proposed casting basin facility to construct pontoons needed for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. Based on current schedules, WSDOT anticipates this short-term period to extend 5 years, from early 2011 through 2015. ‘Long-term’ refers to an indefinite period of time beyond the construction of both the new casting basin facility and the reasonably foreseeable need for SR 520 pontoons.

Constructing the proposed casting basin facility and pontoons would result in potential short-term effects, some of which are listed below:

- New jobs
- Decreased revenues at businesses that depend on unimpeded access
- Increased sales at nearby businesses, such as restaurants
- Noise
- Particulate air pollution
- Increased traffic congestion
- Increased power demand
- Trapped fish
- Water quality effects

All proposed short-term uses of and effects on natural resources would be in accordance with state and federal resource agencies’ permit conditions. Furthermore, these short-term effects and uses would not occur at the expense of long-term resource productivity or availability.

The long-term benefits of the project would justify any short-term adverse effects on and uses of resources that would occur during the proposed project. The primary long-term benefit of the proposed SR 520 Pontoon Construction Project is that WSDOT would build pontoons needed to replace the Evergreen Point Bridge in the event of catastrophic failure in less time than it would take without the project (5
years without the project versus 1.5 years with the project). If a catastrophic bridge failure occurred before the proposed SR 520, I-5 to Medina: Bridge Replacement and HOV Project, then having the pontoons and casting basin facility built would reduce the time required for the planned replacement of the Evergreen Point Bridge by approximately 3 years to 3.5 years.

As discussed in Chapter 1 of this Final EIS, the Evergreen Point Bridge is a critical component of the Puget Sound region’s transportation system, and the consequences of a catastrophic failure and subsequent 5-year closure would be severe. The proposed project would avoid approximately 3 to 3.5 years of the following effects:

- Impaired movement of goods and people and subsequent adverse effects on the local and regional economy
- Substantial increases in commute times, vehicle miles traveled, and fuel consumption
- Increased congestion and air quality effects on alternate routes

If the SR 520 Pontoon Construction Project does not occur, then constructing a new casting basin and pontoons would be carried out under two possible scenarios: (1) an emergency action in response to a catastrophic failure of the Evergreen Point Bridge or (2) the planned bridge replacement. The probable time constraints of building a casting basin and pontoons under an emergency action would reduce the opportunities for cost-savings and environmentally sensitive design, environmental stewardship, and avoidance and minimization of effects.

**What is the project schedule?**

Constructing the new facility in Grays Harbor would begin in spring of 2011, and pontoon construction activities at the new Grays Harbor casting basin facility could begin in summer 2011. All pontoons for this project are anticipated to be complete as soon as 2014. Listed below by year are the key milestones for 2009 and 2010 and the remaining anticipated milestones for the SR 520 Pontoon Construction Project:

- **2009:**
  - Quarter 1: Held comment period on the revised range of alternatives.
  - Quarter 2: Issued request for qualifications for the design-build contractor.
  - Quarter 3: Announced the Preferred Alternative; issued request for proposals for constructing new casting basin facility and pontoons.
Chapter 6 Other Considerations and Next Steps

- 2010:
  - Quarter 1: Awarded design-build contract. Approved design-build contractor to conduct preliminary engineering work.
  - Quarter 2: Issued Draft EIS, held public hearing, and began 45-day comment period.
  - Quarter 3: Completed 45-day comment period on Draft EIS.
  - Quarter 4: Issued Final EIS.

- 2011:
  - Quarter1: Issue ROD, and begin constructing new casting basin facility in Grays Harbor.
  - Quarters 2 through 4: Continue new casting basin facility construction at Grays Harbor; begin early pontoon construction activities (fabricating pontoon steel rebar and wood forms) at new casting basin facility at Grays Harbor

- 2012:
  - Quarter 1: Complete construction of new casting basin facility at Grays Harbor.
  - Quarters 2 through 4: Continue pontoon construction at Grays Harbor facility.

- 2013:
  - Quarters 1 through 4: Continue pontoon construction at Grays Harbor.

- 2014:
  - Quarters 1: Continue pontoon construction at Grays Harbor.
  - Quarter 2: Complete pontoon construction for catastrophic failure preparedness.

Are there unresolved issues, concerns, and/or controversy?

General Public Concerns

Overall, the proposed SR 520 Pontoon Construction Project has received strong support from the general public and the Grays Harbor community. Some concerns, however, have been raised:

- Traffic and access issues resulting from increased truck trips
- Noise related to pile-driving and other proposed construction activities
- Project effects on sport and commercial fishing in Grays Harbor
- Future site use

WSDOT will continue to work closely with the public through final project design and during casting basin and pontoon construction to
ensure that best management practices are used to minimize traffic and noise-related effects and effects on local fishing. WSDOT will also continue to communicate to interested parties and the general public about the fate of the proposed casting-basin facility after pontoons are built for this project.

As discussed in Chapter 1, WSDOT has identified two potential points when a decision about the future use of the casting basin facility could likely be made: (1) when the proposed SR 520 Pontoon Construction Project is completed, and (2) if and when 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.

Participating Agency and Tribal Issues

As described in Chapter 1, FHWA and WSDOT invited tribes, local jurisdictions, and federal, state, and local agencies with a potential interest in the project to serve as participating agencies throughout the environmental review process. Participating agencies were invited to comment on the purpose and need statement, the screening process used to evaluate new casting basin facility candidate sites, and the range of alternatives. Comments received from participating agencies were fully considered by FHWA and WSDOT before a final purpose and need statement was developed and before a final decision on which alternatives to advance for full Draft EIS evaluation was made. FHWA and WSDOT have continued to consult with participating agencies through the development of the Final EIS and will continue to do so through the issuance of the ROD. FHWA and WSDOT anticipate that the ROD will be issued 30 days after the Final EIS is published. Key issues and concerns raised by participating agencies throughout the NEPA process are summarized below.

Port of Grays Harbor IDD #1 Site

WSDOT worked closely with the participating agencies to ensure that all reasonable alternatives were identified and fully evaluated in the Draft EIS, consistent with environmental regulations. Early in the alternatives analysis process, there was substantial controversy among participating regulatory agencies about including the Port of Grays Harbor IDD #1 site in the range of alternatives because developing a casting basin facility on this site would directly affect over 25 acres of federally protected wetlands. Because other feasible sites were available that would be less environmentally damaging to develop, FHWA and WSDOT decided to eliminate the IDD #1 site from further consideration. The Port of Grays Harbor and the City of Hoquiam did not support the dismissal of IDD #1, but neither did they dispute the
FHWA and WSDOT decision; they continue to be strong partners supporting the environmental process and the project itself. This is no longer considered a controversial issue.

**Potential Pontoon Moorage**
Several resource agencies, the tribes, and local environmental and fishing groups have expressed concern about the effects of pontoon moorage on fish and aquatic resources in Grays Harbor. The moored pontoons could change how sediment is transported nearby, could shade the sea bottom beneath the pontoons, and could become colonized by marine fauna such as barnacles that commonly cause what is known as biofouling. As a result of biofouling, invasive species such as green crab could be transported to Lake Washington on the pontoons. In addition, moored pontoons could interfere with nearby fishing activities. In response to these concerns, WSDOT has completed studies to better determine potential pontoon moorage effects. The *Fish and Aquatic Resources* discussion of Section 3.1, Ecosystems, in this Final EIS describes the general findings of this work, and WSDOT will continue to work closely with the appropriate resource agencies and tribes on ways to mitigate any pontoon moorage effects.

**Launch Channel Dredging at the Aberdeen Log Yard Site**
Participating agencies and interested tribes have raised concerns about the dredging required to construct the launch channel in the relatively shallow nearshore at the Aberdeen Log Yard site. Concerns include the effects on benthic organisms, the release of contaminated sediments, altered sediment movement patterns, effects on Port of Gray Harbor’s Terminal 4 facility operations from sediment transport issues and maintenance dredging, and interruptions to local and tribal fishing. WSDOT conducted studies and analyses in response to these concerns, and findings of that work are presented in Section 3.1.

**Tribal Fishing and Fisheries Issues**
The Quinault Indian Nation is concerned about the project interrupting and potentially conflicting with tribal fishing in Grays Harbor as well as about the continued status of those stocks upon which the Nation’s fishers rely. WSDOT is working closely with the Quinault Indian Nation to maintain open and frequent communications about these issues and ensure that best management practices would be implemented to minimize project effects on tribal fishing and on fish populations in general. WSDOT has continued to coordinate with the Nation on issues such as mitigation development, fish handling, and best management practices. During the project, WSDOT would work with the Quinault Indian Nation to schedule and notify fishers of upcoming in-water activities, such as floating the pontoons out of the casting basin. FHWA, WSDOT, and the Quinault Indian Nation are developing a
Memorandum of Agreement to resolve issues with the Nation and to document commitments.

**Native American Fish Traps on the Anderson & Middleton Site**

An archaeological site containing a precontact Native American fish trap complex that was discovered on the Anderson & Middleton site is eligible for listing on the NRHP. Further consultation with FHWA, the DAHP, and the identified concerned tribes would be required to determine whether the fish traps warrant preservation in place. WSDOT would pursue this determination if the Anderson & Middleton Alternative were ultimately selected.

**What are the next steps for this project?**

WSDOT will continue preliminary engineering and preliminary design work for the proposed project. If a build alternative is selected, then final project design will begin after the ROD is signed. WSDOT will continue to work closely with participating agencies and tribes to avoid and minimize environmental effects. WSDOT might pursue additional environmental analysis, if warranted, to address design changes, mitigation planning, or concerns raised by interested parties.

Thirty days after the notice of availability for the Final EIS is published in the *Federal Register*, FHWA anticipates signing the ROD, which will explain the reasons for the project decision and summarize any mitigation measures to be incorporated into the project. After the ROD is signed, WSDOT will begin final design, obtain permits, and then begin construction. WSDOT will continue to coordinate with the public, participating agencies, and interested tribes throughout casting basin construction and operation.