

DETERMINATION OF NON-SIGNIFICANCE

Description of Proposal: **SR 105/Graveyard Spit - Dynamic Revetment and Dune Restoration**

The Washington State Department of Transportation (WSDOT), in coordination with the Washington State Department of Ecology and US Army Corps of Engineers, is developing the SR 105/Graveyard Spit - Dynamic Revetment and Dune Restoration Project to construct an innovative nature-based dune and cobble berm to restore and protect Graveyard Spit along the northern entrance to Willapa Bay and Pacific Ocean. The proposed project is located on State Route (SR) 105 between milepost 19.50 to 20.10 near North Cove and Tokeland in Pacific County, Washington, Sections 3 and 4 of Township 14 North, Range 11 West.

The design intent of this project is to raise the existing Graveyard Spit dune in elevation to prevent further landward migration by constructing a wave absorbing dynamic revetment, which simulates a natural cobble beach. The project footprint will require up to 13 acres of land disturbing activities, including 10 acres of upland dune restoration and 0.40 acres of wetland and tidal marsh restoration. The benefits of this project include reducing the potential for flooding and storm damages to SR 105 roadway and the Shoalwater Bay Indian Reservation, while also protecting the existing tidal marsh and critical habitat from further shoreline retreat.

Construction will take an estimated 160 working days to complete, and is anticipated to begin in Summer 2024, subject to funding availability. The traveling public may experience intermittent delays due to construction traffic and temporary SR 105 single lane closures during this time. Construction will include both day and night work. Construction will be performed within WSDOT right of way and Shoalwater Bay Indian Reservation. Project Web Page: <https://wacoastalnetwork.com/local-projects/wecan/projects/graveyard-spit-project/>

Proponent: **WSDOT**

Location of proposal, including street address, if any: **The proposed project is located on SR 105 between milepost 19.50 to 20.10 near North Cove and Tokeland in Pacific County, Washington, Sections 3 and 4 of Township 14 North, Range 11 West.**

Lead Agency: **WSDOT**

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request. This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below.

Comments must be submitted by: **August 1, 2022**

Responsible Official: **Angie Haffie** Address: **11018 NE 51st Circle, Vancouver, WA 98682**
Position/title: **WSDOT Southwest Region Environmental Manager** Phone: **(360) 946-7823**

Date: 6/23/22

Signature: _____

Angie Haffie

WAC 197-11-960 Environmental checklist.

ENVIRONMENTAL CHECKLIST

Purpose of checklist:

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

A. BACKGROUND

1. Name of proposed project, if applicable: SR 105/Graveyard Spit - Dynamic Revetment and Dune Restoration

2. Name of applicant: Washington State Department of Transportation (WSDOT), Southwest Region

3. Address and phone number of applicant and contact person:

Angie Haffie, WSDOT Southwest Region Environmental Manager
11018 NE 51st Circle
Vancouver, WA 98682
Phone Number: (360)946-7823

4. Date checklist prepared: June 22, 2022

5. Agency requesting checklist: WSDOT

6. Proposed timing or schedule (including phasing, if applicable):

Planning, preliminary design and continued public involvement began in fall 2019 with conceptual design, environmental review and permitting throughout 2022/2023. NEPA is anticipated to be complete by June 2023, project advertisement by January 2024 and construction to begin in Summer 2024, pending construction funding.

Construction will take an estimated 160 working days to complete and is anticipated to begin Summer 2024; however, work is dependent on future funding for the construction phase. The traveling public may experience intermittent delays due to construction traffic and temporary SR 105 single lane closures during this time. Construction will include both day and night work.

WSDOT will continue to coordinate with all stakeholders throughout the design and construction, including coordination with Willapa Erosion Control Alliance Now (WECAN). As part of the public outreach efforts, Washington State Department of Ecology (Ecology) has developed the following project webpage:

<https://wacoastalnetwork.com/local-projects/wecan/projects/graveyard-spit-project/>

7. Do you have any plans for future additions, expansion, or further activity? Will they be related to or connected with this proposal? If yes, explain.

This project will tie into adjacent projects along SR 105 and the Pacific Ocean shoreline as an integrated system. On-going WSDOT maintenance will continue throughout the SR 105 corridor.

8. List any environmental information you know about that has been prepared. Is there any information that will be prepared, or is directly related to this proposal?

The following documentation has been prepared for this project:

- Biological Assessment (BA)
- Cultural Resources Survey and Report
- Shoreline Exemption per RCW 90.58.356(2)(d) and (3) – Notifications were sent on April 26, 2022
- Joint Aquatic Resources Permit Application (JARPA)
- Preliminary Hydraulic Design Report
- Coastal Engineering Analysis
- Dune and Wetland Restoration Monitoring Protocols

The following documentation will be finalized prior to construction:

- Final Hydraulic Design Report
- Geotechnical Report
- Water Quality Monitoring Protection Plan (WQMPP), if required by Ecology
- Hazardous Waste and Asbestos Good Faith Investigation (GFI)
- Critical Areas and Wetland Memorandum

9. Do you know whether applications are pending for governmental approvals of other proposals? Will they directly affect the property covered by your proposal? If yes, explain.

There are no known WSDOT affiliated pending applications and/or governmental approvals for other proposals within this project's vicinity at this time. However, WSDOT will continue ongoing efforts to secure future construction funding for this project to continue moving forward with implementation.

WSDOT is developing a capital improvement project on SR 105 between MP 19.90 and 20.40 to address the immediate need for roadway slope protection within the project vicinity. The proposed project will place 6" rounded cobble dynamic revetment materials adjacent to the areas with the most recent erosion and threat to SR 105. The proposed project is anticipated to begin in Summer 2023 and up to 60 working days.

10. List any government approvals or permits that will be needed for your proposal, if known.

WSDOT will obtain the following permits and approvals prior to construction:

- SEPA WSDOT Lead Agency: Determination of Non-Significance (DNS) and Checklist
- National Environmental Policy Act (NEPA): U.S. Army Corps of Engineers (USACE) as federal lead
- Endangered Species Act (ESA)
 - National Oceanic and Atmospheric Administration (NOAA) National Marine Fisheries Service (NMFS) - Informal Consultation
 - United States Fish and Wildlife Service (USFWS) - Formal Consultation and Biological Opinion
- Section 106 of the National Historic Preservation Act & Tribal Coordination
 - Washington State Historic Preservation Officer (SHPO) Department of Archaeology and Historic Preservation (DAHP) Concurrence
- USACE – Section 404 Nationwide Permit (NWP) 27 & Section 10 Permit
- Ecology – Section 401 Water Quality Certification
- Ecology – Coastal Zone Management Act (CZMA) Consistency Determination
- Environmental Protection Agency (EPA) – CWA Section 401 Certification
- Pacific County – Development Permit and Flood Plain Review
- Shoalwater Bay Indian Tribe Reservation – Agreement
- Washington Department of Natural Resources (DNR) – Aquatic Use Authorization/Approval
- Washington State Parks and Recreation – Conservation District, potential Right of Entry
- Washington State Department of Fish and Wildlife (WDFW) – Hydraulic Project Approval (HPA)
- Ecology – Section 402 National Pollution Discharge Elimination System (NPDES) Construction Stormwater General Permit (CSWGP)

11. Give a brief, complete description of your proposal. Include the proposed uses and size of the project/site.

WSDOT, in coordination with the Ecology and USACE, is developing the SR 105/Graveyard Spit - Dynamic Revetment and Dune Restoration Project (Project) to construct an innovative nature-based dune and cobble berm to restore and protect Graveyard Spit along the northern entrance to Willapa Bay and the Pacific Ocean. The proposed project is located on State Route (SR) 105 between milepost 19.50 to 20.10 near North Cove and Tokeland in Pacific County, Washington, Sections 3 and 4 of Township 14 North, Range 11 West.

The design intent of this project is to raise the existing Graveyard Spit dune in elevation to prevent further landward migration by constructing a wave absorbing dynamic revetment, which simulates a natural cobble beach. The project footprint will require up to 13 acres of land disturbing activities, including 10 acres of upland dune restoration and 0.40 acres of wetland and tidal marsh restoration. The benefits of this project include reducing the potential for flooding and storm damages to SR 105 roadway and the Shoalwater Bay Indian Reservation, while also protecting the existing tidal marsh and critical habitat from further shoreline retreat. This project has been designed to tie into adjacent projects along SR 105, Willapa Bay and Pacific Ocean shoreline as an integrated system.

Total size of the project site is 567,720 sq. ft.

Construction Access: An unimproved 12-foot-wide access road will be constructed along the dynamic revetment area adjacent to the roadway. The access road would remain following construction. Gravel and rock will likely be placed with dump trucks and spread with a bulldozer or excavator. It will be necessary to remove the guardrail to access the Project area.

Project Timing: Construction will take an estimated 160 working days to complete. All work below the HTL and OHWM will occur during the approved USACE marine in-water work window (IWWW) between June 16th and February 28th. Work activities will mostly be conducted during the daytime hours; however, occasional nighttime work may be necessary to accomplish work during low tide events.

Traffic Control: The traveling public may experience intermittent delays due to construction traffic and temporary SR 105 single lane closures during this time. Traffic control may consist of signage, traffic cones, barrels, and candles, as well as automated traffic signals for one-way traffic. A portable message board, warning lights, temporary traffic signals, or temporary portable illumination may also be used. Flaggers will be used intermittently as needed. The Project will follow a traffic control plan specific to daily activities.

Staging: Staging locations for the Project will be selected by the Contractor but may include areas such as the adjacent WSDOT-owned property or parcels near the project area, and areas within the right-of-way (ROW) adjacent to the project area. Existing paved and gravel areas located on WSDOT Parcel 14110442019 will be made available for use as a vehicle staging area during construction.

12. Location of the proposal.

The proposed Project is located on State Route (SR) 105 between milepost 19.50 to 20.10 near North Cove and Tokeland in Pacific County, Washington, Township 14 North, Range 11 West, Sections 3 and 4 (**Figure 1**). The Project site is located within the 6th Field Hydraulic Unit Code 171001060600 Willapa Bay & 171001060203 Cedar River-Frontal Willapa Bay, within the WRIA 24 – Willapa.

South Access: Head northwest from City of Raymond on US101 N toward Monohon Landing Rd, turn left onto SR105 N/Park Ave. Continue approximately 20.00 miles.

North Access: From US12 southbound, head west on E Wishkah Blvd toward S Newell St. Turn left onto S H St. Continue onto US101 S. Continue straight onto SR105 S for 18.4 miles and turn left to stay on SR105 S. Continue approximately 10 miles till MP 20.20.

Figure 1. Project Vicinity Map.



B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other.
 The Project area is generally flat with steep slopes transitioning to the roadway.

b. What is the steepest slope on the site (approximate percent slope)?
 The steepest slopes are up to 65% near the existing SR 105 roadway embankment. Existing revetments that will be repaired at approximately 1-1.5 slope.

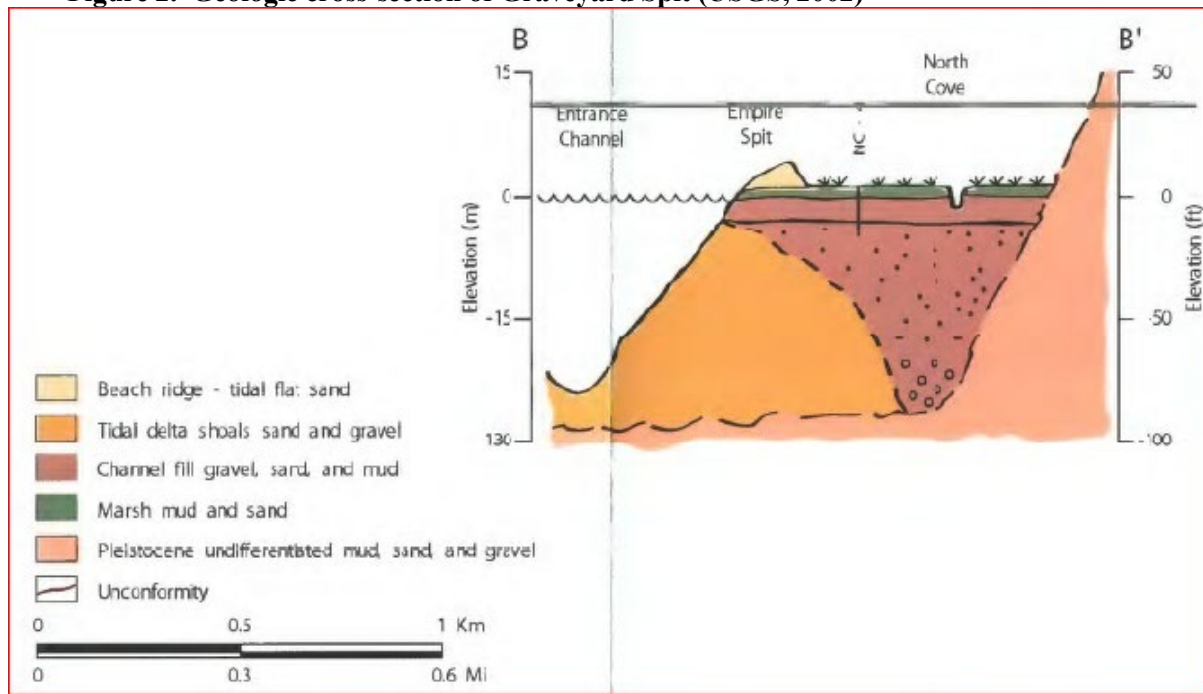
c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.
 According to soil mapping developed by the Natural Resources Conservation Service (NRCS), general soil types present on the site include Fluvaquents and Ocosta silty clay loam (**Table 1**). A cross-section developed by the USGS in the Graveyard Spit area shows that the area is underlain at depth by Pleistocene littoral sediments, with coarser channel fill overlying that (**Figure 2**). Above the channel fill is mud, peat, and sand.

Table 1. NRCS Soil classifications for the SR 105 Graveyard Spit Project.

Grays Harbor County Area, Pacific and Wahkiakum Counties, Washington (WA627)			
Grays Harbor County Area, Pacific and Wahkiakum Counties, Washington (WA627)			
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
39	Fluvaquents, tidal	55.0	80.5%
104	Ocosta silty clay loam	4.1	5.9%
169	Water	9.3	13.6%
Totals for Area of Interest		68.4	100.0%



Figure 2. Geologic cross-section of Graveyard Spit (USGS, 2002)

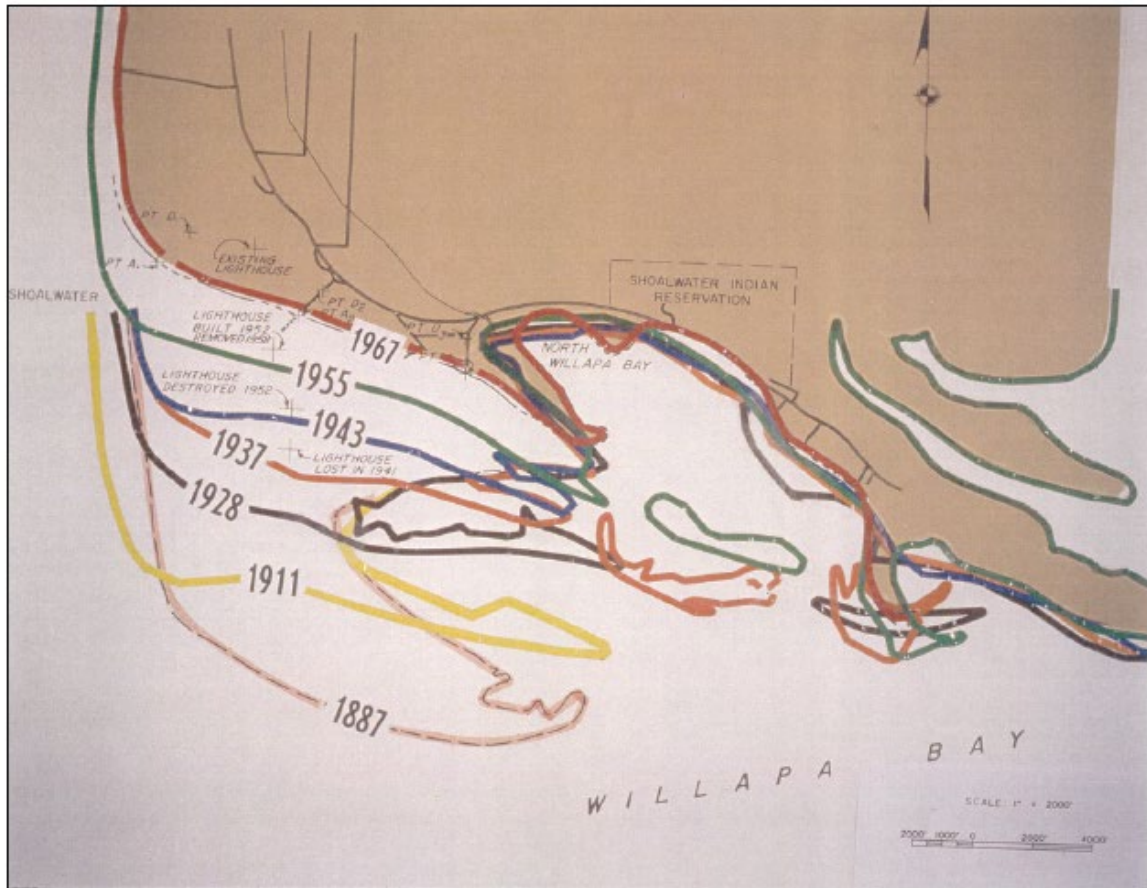


d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Beach erosion at Cape Shoalwater has been a chronic problem since the turn of the 20th century. By 1971, shoreline erosion had destroyed 3,000 acres of public and private lands including over 30 homes, businesses, a grange hall, a public schoolhouse, a US Coast Guard Station, and twice forced the relocation of the Coast Guard Lighthouse. SR 105 was relocated landward twice by 1978 and continues to be regularly reinforced with additional shoreline armoring (Reference: <https://www.co.pacific.wa.us/ordres/2020-2040-CompPlan-FINAL.pdf>, page 48).

The Project area is historically known to be variable with the movement in soils. Through hydraulic analysis and design, it has been estimated that this area of Tidal Marsh has been eroding at a rate of approximately 75 feet a year within recent history. Prior to the late 1800s the channel was located to the south and wrapped around the tip of Cape Shoalwater (**Figure 3**).

Figure 3. Historical erosion of Cape Shoalwater and northward migration of the entrance channel.



e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.

The Project footprint will require up to 13 acres of land disturbing activities, including 4 acres of upland dune restoration on the back side of the structure and 6 acres of dune restoration between the structure and wetland/tidal marsh restoration areas. An additional 9 acres of existing dune area will be protected behind the revetment structure that will be available for future restoration by others.

In total, the project will include approximately 234,000 CY of fill material including native fill, to be excavated and used on-site. Excess and/or non-suitable excavated native material will be placed at an approved off-site location per WSDOT standard specification 2-03.3(7)C Contractor-Provided Disposal Site.

Imported materials will include approximately 85,000 CY of 6-inch minus rounded cobble and 120,000 CY of 8-inch minus angular rock throughout the dynamic revetment structure. Up to 4,700 CY of 2 to 3-man rock will be used to transition from the existing roadway embankment adjacent to SR 105. All fill materials will be selected from WSDOT approved sources of the Contractors' choosing.

Suitable excavated material will be used on-site to re-build the back side of the dune as a part of the dynamic revetment structure. Excavation will likely be completed with an excavator, drill rig, crane and/or backhoe. Material excavated is anticipated to be a combination of existing fill and suitable native material.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

Yes, erosion may occur due to construction activities, including excavation and fill. Work below the OHWM and High Tide Line (HTL) will be planned to occur at low tide to reduce the risk of water quality impacts. However, the sandy soils being impacted are generally large grained and are not anticipated to cause higher turbidity about background to the Willapa Bay and Pacific Ocean water quality levels.

The Contractor will implement Best Management Practice (BMP) measures throughout construction and modify the Project specific BMPs to ensure all work is within state water quality standards and follow the project's Ecology Section 401 Water Quality Certification requirements throughout the project. The Contractor will be required to also have a WSDOT approved Temporary Erosion & Sedimentation Control (TESC) Plan and Spill Prevention, Control, and Countermeasure (SPCC) Plan, and coverage under Ecology's Section 402 NPDES CSWGP prior to the start of work.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The resulting pollution generating impervious surface on SR 105 will be the same as pre-project. The Project has been delineated as one Threshold Discharge Area (TDA) and discharges to the Willapa Bay and Pacific Ocean.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

Erosion control measures will be detailed in the Contractors TESC Plan, employed according to the current *WSDOT Highway Runoff Manual* and any in accordance with all applicable permit requirements. All applicable BMPs will be implemented during construction to reduce or control erosion, or other impacts to the earth and surface waters.

2. Air

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, and industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

Possible air pollution or nuisance odor may be generated due to construction activities such as dust and hydrocarbon emissions. The Project must comply with federal, state, and local regulations. Air quality will return to preconstruction conditions after construction is completed.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

No, the Project will not be affected by off-site sources of emissions or odors.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

Air Quality control measures may include the following:

- Haul distances will be minimized when possible.
- Cover loads of materials, wet materials in trucks as needed, and provide adequate freeboard on the trucks (space from the top of the material to the top of the truck).
- Remove particulate matter deposited on roadways (vacuum sweeper, hand sweeping, watering, etc.)
- Cover dirt, gravel, and debris piles as needed.
- Require emission-control devices on gasoline and diesel-powered construction equipment.
- Use well-maintained equipment to reduce emissions.

3. Water

a. Surface:

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

The Project is adjacent to the entrance of the Willapa Bay and is heavily influenced by the Pacific Ocean tide cycles. Project impacts have been calculated using the NOAA Tides & Currents Datums for 9440910 for Toke Point, Washington in Datum: NAVD88 (Table 2).

Field reviews were completed in winter of 2021 to delineate and survey wetland resources within the project area. A WSDOT Wetland Specialist has delineated Wetland A, a Category I depressional wetland system, located within the project Area of Potential Effect (APE) to the northeast. Wetland A is adjacent to a SR105 cross culvert which intercepts the culvert water outflow before it is discharged to the adjacent tidally influenced marsh system. The Tidal Marsh continuing east of the Wetland A boundary, following SR105 and southeast following the existing dune over wash area. The Tidal Marsh then discharges into an existing estuary channel outside of our project APE and continues into the mouth of the Willapa Bay and entrance to the Pacific Ocean.

Table 2: NOAA Tides & Currents Datums for 9440910, Toke Point WA.

Elevations on NAVD88		
Station: 9440910, Toke Point, WA		T.M.: 120
Status: Accepted (Apr 17 2003)		Epoch: 1983-2001
Units: Feet		Datum: NAVD88
Control Station:		
Datum	Value	Description
MHHW	8.10	Mean Higher-High Water
MHW	7.36	Mean High Water
MTL	3.96	Mean Tide Level
MSL	3.96	Mean Sea Level
DTL	3.64	Mean Diurnal Tide Level
MLW	0.55	Mean Low Water
MLLW	-0.82	Mean Lower-Low Water
NAVD88	0.00	North American Vertical Datum of 1988
STND	-5.34	Station Datum
GT	8.92	Great Diurnal Range
MN	6.81	Mean Range of Tide
DHQ	0.74	Mean Diurnal High Water Inequality
DLQ	1.37	Mean Diurnal Low Water Inequality
HWI	8.78	Greenwich High Water Interval (in hours)
LWI	2.54	Greenwich Low Water Interval (in hours)
Max Tide	13.59	Highest Observed Tide
Max Tide Date & Time	11/14/1981 13:30	Highest Observed Tide Date & Time
Min Tide	-4.63	Lowest Observed Tide
Min Tide Date & Time	12/19/1983 19:06	Lowest Observed Tide Date & Time
HAT	10.64	Highest Astronomical Tide
HAT Date & Time	12/23/2003 20:12	HAT Date and Time
LAT	-3.85	Lowest Astronomical Tide
LAT Date & Time	07/03/2004 15:42	LAT Date and Time

2. **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

Yes, the Project will impact below the HTL and OHWM of the Willapa Bay. There will be a net increase in aquatic resource functions and services as a result of this project. Therefore, no compensatory mitigation will be required for this project per NWP 27 Aquatic Habitat Restoration, Enhancement, and Establishment Activities.

Once the construction is funded, WSDOT will conduct new survey and drone footage to document the actual wetland and Willapa Bay jurisdictional lines prior to Construction. The Project design will be updated accordingly to avoid and minimize impacts to surface waters.

3. **Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

The Project has been designed to avoid and minimize adverse impacts to the aquatic environment and will result in a net gain of habitat. All permanent and temporary excavation and fill within the Willapa Bay will be permitted prior to the start of construction.

This project proposes to build on to the existing SR 105 revetment structures, by installing a transition section from 4-man, 3-man rock to 6 in. minus cobble incorporating engineered large woody material (LWM) structures. HTL has been calculated at the Highest Astronomical Tide (HAT) for 2022 which is 10.64 ft. elevation at Datum: NAVD88. The proposed project impacts are shown in **Table 3** below.

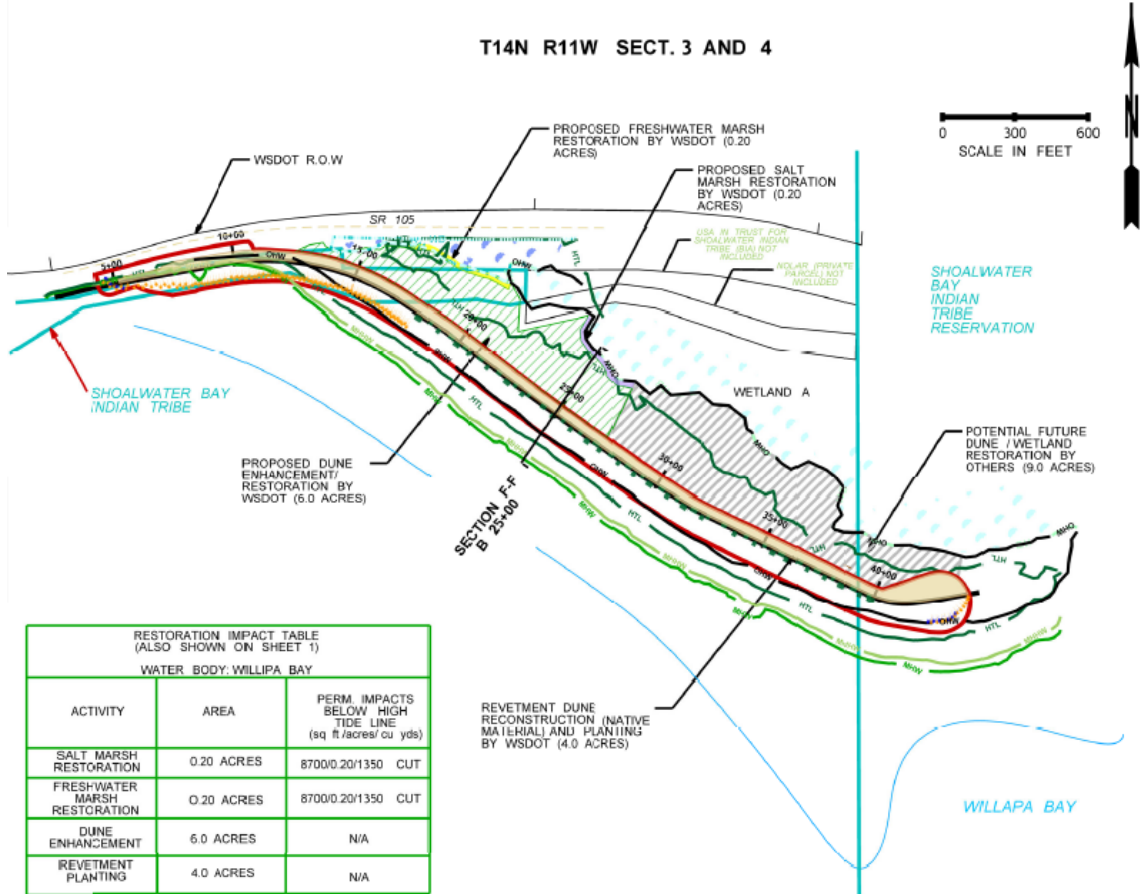
Table 3: Critical Areas Impact Table for Graveyard Spit project.

PROJECT IMPACT TABLE				
WATER BODY: WILLIPA BAY				
ACTIVITY	PERM. IMPACTS BELOW HIGH TIDE LINE (sq ft /acres/ cu yds)	PERM. IMPACTS BELOW ORDINARY HIGH WATER MARK (sq ft /acres/cu yds)	PERM. IMPACTS BELOW MEAN HIGH WATER (sq ft /acres/cu yds)	PERM. IMPACTS BELOW MEAN HIGHER HIGH WATER (sq ft/acres/cu yds)
CUT	5,466/0.13/1,080	37,040/0.85/7,300	67/0.00/14	600/0.01/120
FILL	78,430/1.80/35,765	111,770/2.60/50,965	49,120/1.10/22,400	59,100/1.4/27,000

A total of 188 pieces of LWM will be incorporated into the dynamic revetment structure. Including 135 each - 30' long, 2' diameter at breast height (DBH) with rootwads to be installed at or below the HTL to help dissipate wave energy at the northern and southern project termini. 53 each - varies 15'-30' long, 18"-24" DBH will be installed at the dune crest to mimic naturally occurring driftwood material.

No temporary or permanent fill or dredging is anticipated within the adjacent identified Wetland A or Tidal Marsh boundaries. The total area for Wetland A is approximately 2 acres and the Project proposes approximately 0.20 acres of wetland restoration adjacent to the wetland boundary. The total area for Tidal Marsh is approximately 63 acres and the Project proposes approximately 0.20 acres of restoration adjacent to the salt marsh boundary (**Figure 4**).

Figure 4. Proposed and Future Salt and Freshwater Marsh Restoration Areas.



Wetland buffer impacts will be regulated and restored per WSDOT policies consistent with WSDOT Roadside Policy requirements, and all applicable environmental permits as described in the project’s Wetland Delineation and Critical Areas Memorandum.

All appropriate BMPs will be implemented to minimize impacts during construction per the JARPA Drawings, detailed plan sheets, contract standard specification and specials and Erosion control measures will be detailed in the Contractors approved TESC Plan. WSDOT will delineate sensitive areas and minimized impacts by detailing the placement of High Visibility Fencing (HVF) on the plan sheets.

- All work below the HTL and OHWM will occur during the approved USACE, ESA and WDFW marine IWWW between June 16th and February 28th.
- All work below the HTL and OHWM will occur at low tide.
- Dewatering is not anticipated to be required during construction. However, if high groundwater is encountered, the Contractor may be required to pump excess water out of the work zone upland for turbidity settlement and infiltration if the proposed work may cause an exceedance in state water quality standards.
- All equipment that operates below HTL, OHWM and MHHW mark will use biodegradable oils in hydraulic lines per WSDOT Standard Specifications 8-01.3(1)C5 and 8-01.3(1)C6.
- Fill material will be placed according to design. Clean excavated native material may be re-used on-site as native borrow and non-suitable material will be disposed of off-site at a WSDOT approved up-land disposal site.

- All equipment operating will be checked daily for leaks and inspected to ensure that it is clean and free of external petroleum-based products.
- Equipment fueling and maintenance within 200 feet of surface waters will be contained as approved by WSDOT and detailed in the Contractor's SPCC Plan.
- All disturbed areas will be restored using WSDOT Roadside Policy requirements and all applicable environmental permits.

4. Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

The project does not require surface water withdrawals or diversions. Previous WSDOT projects have documented no water quality issues with the similar excavation and fill activities adjacent to the proposed project area.

5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Yes, the proposed project is located within the Federal Emergency Management Agency (FEMA) designated 100-year floodplain of the Willapa Bay. Concurrence from Ecology and Pacific County in November 2021 determined that a local floodplain review will be required for this project due to its proximity to the Pacific Ocean. WSDOT confirmed with Pacific County in April 2022 that a Development Permit Application will be required for flood plain review and concurrence.

Furthermore, Ecology confirmed that the project area is within a coastal VE Zone and there is no floodway, so the project does not need to show 'no-rise' regarding impact to mapped FEMA flood elevations/flows. A Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) should not be necessary.

6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

The project does not involve any discharges of waste material to surface waters. All BMPs will be implemented to prevent accidental discharges of waste materials outside of the permitted project footprint.

All unsuitable excavated material and other construction waste will be collected, removed off-site, and disposed of properly according to the waste material. There is no anticipated discharge of waste materials to surface waters. The Contractor is required to implement all applicable BMPs to prevent impacts to sensitive areas, including waters of the state.

b. Ground:

1. Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

This project will not include discharged to ground water nor will ground water be withdrawn. However, the Willapa Bay is tidally influenced, and water levels fluctuate significantly throughout the Graveyard Spit. During key trench excavation, the project will experience high water tables and may encounter ground water. The work area is anticipated to be inundated by tidal action, therefore the short duration of temporarily increased turbidity from work activities will likely not be a significant impact to water quality.

Groundwater will be isolated to the excavated areas and allowed to infiltrate and is anticipated to be inundated by tidal action daily. The Contractor will follow the above outlined turbidity testing procedures during in-water work to ensure strict adherence to state water quality standards.

2. **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any. Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

There is no anticipated waste material that will be discharged to groundwater. No waste disposal systems are proposed or will be affected. The Contractor will follow the Ecology Section 402 NPDES CSWGP requirements throughout construction.

c. Water runoff (including stormwater):

1. **Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

Stormwater runoff may occur, both during and post construction. Appropriate BMPs will be implemented during construction to collect and/or treat water prior to discharge from the project site.

Excavation will correspond with the low tide cycle to limit and avoid in-water work, and overall construction will be limited or postponed during local storm events. Key trench excavation and placement of fill will proceed in sections to minimize exposure of the work area to the tides. The Contractor will use adaptive management to address any water quality concerns during construction including, but not limited to stopping work to allow turbid water within the key trench to settle, and/or pumping water up-land through wattles, check dams, or other appropriate BMPs per WSDOT Standard Specification 8-01.3(1)D Dispersion/Infiltration.

2. **Could waste materials enter ground or surface waters? If so, generally describe.**

In the event of an accidental spill on the project, it is possible that waste materials could enter ground waters. All known and reasonable technologies (AKART) will be followed to minimize this possibility. The Contractor is required to provide a SPCC Plan, which must be approved by WSDOT prior to beginning construction. Following the SPCC will minimize the risk and impacts of an accidental spill and outline procedures in the case of a spill.

Equipment operating below the HTL and OHWM will use only biodegradable oils in hydraulic lines per WSDOT Standard Specifications 8-01.3(1)C5 and 8-01.3(1)C6.

<https://www.wsdot.wa.gov/publications/manuals/fulltext/M41-10/SS.pdf>

3. **Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:**

Prior to beginning construction work, the project limits will be marked and appropriate BMPs installed to protect and minimize impacts to sensitive areas. BMPs must include high-visibility fence/silt fence to delineate sensitive areas and as directed in the project's TESC Plan and per WSDOT Standard Specifications:

<https://www.wsdot.wa.gov/publications/manuals/fulltext/M41-10/SS.pdf>.

Erosion and sediment control measures include, but may not be limited to:

- Appropriate BMPs will be implemented to reduce water impacts per local, state, and federal law.
- Clearing and grubbing will be minimized to only those areas needed for immediate construction.
- Water quality testing and visual observations will be recorded in the project's site logbook throughout construction and in accordance with the Ecology Section 402 NPDES CSWGP.

- Stormwater runoff will be collected and treated in accordance with all federal, state, and local requirements prior to release to surface or groundwaters.
- Temporarily disturbed pervious areas will be fully restored with native woody and herbaceous vegetation.
- WSDOT will document Environmental Compliance Assurance Procedures (ECAP) in the case of reoccurrence of the noncompliance and/or regulatory actions taken on this project.

Equipment operating below the HTL and OHWM will use only biodegradable oils in hydraulic lines. Equipment will be checked daily for leaks and inspected to ensure that it is clean and free of external petroleum-based products. Equipment within 50 feet of waters of the state are required to have secondary containment. Equipment staging, fueling, maintenance and material storage will occur at least 200 feet from the waters of the state and all sensitive areas.

4. Plants

a. **Check or circle types of vegetation found on the site:**

Deciduous tree: Alder, maple, and alder

Evergreen tree: Fir, cedar, spruce

Shrubs: Salmon berry, elderberry

Grass: Dune and roadside grasses

Wet soil plants: Tufted hairgrass, Baltic Rush, Pacific Silverweed, Lingbye's Sedge

Water plants: Cattail, water parsley, Reed canarygrass, Small-fruited Bulrush, Swamp Beggarsticks

Pasture, crop, or grain

b. **What kind and amount of vegetation will be removed or altered?**

Existing native dune grasses and shrubs may be encountered within the upland project area along the length of Graveyard Spit. Existing wetland vegetation may be found to the east adjacent to the project and will not be impacted. Specific site restoration and re-planting will be detailed in the Wetland Delineation and Critical Areas Memorandum.

Existing mixed deciduous and evergreen forest is located across from SR 105, within the project vicinity. Existing paved and gravel areas located on WSDOT Parcel 14110442019 will be used for vehicle staging area during construction. No trees or understory shrubs are anticipated to be impacted as a result from staging activities.

The woody vegetation adjacent to the SR 105 roadway headed south that will be impacted includes alder and spruce trees, with an understory of salmonberry, elderberry, and twinberry. Although the project will directly remove this vegetation, the ongoing shoreline erosion would eventually result in the removal of this vegetation in the absence of this project (likely within the next few years based on the recent rapid advancement of the shoreline erosion). Some of the existing trees are damaged due to increased saltwater exposure.

c. **List threatened or endangered species known to be on or near the site.**

According to USFWS GIS data, there are no known threatened or endangered plant species or critical habitat in the project area. This portion of Willapa Bay does not support eelgrass beds. WSDOT, in early consultation with USFWS, determined the project would have no effect on endangered or threatened plant species due to lack of suitable habitat within the project area. No known threatened or endangered plant species have been documented on or near the project site.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site.

The constructed dune area and areas of existing sand overwash used for construction staging will be restored according to the plan illustrated in **Figure 4, Section 3**. Restoration planting would occur during the first available dormant season (between October and March) and following soil enhancement work within the identified restoration areas. Soil enhancement includes compost tilled into existing sandy soil and select areas of bark mulch and the placement of large weathered woody material salvaged during construction. The Constructed Dune behind the dynamic revetment will be stabilized using the native American Dune Grass, *Elymus mollis*. Dune Enhancement areas identified in **Figure 4** will be planted to mimic native dune communities in northern the Willapa Bay area. The southern portion of this area will be planted with significant open sand patches (20%) to provide nesting habitat for certain shoreline bird species, with the remainder of area planted as a mixed dune community; 60% American Dune grass and associated native perennial species, and 20% native woody species including Pacific Wax Myrtle and Hookers Willow. The northern area closer to SR-105 will be planted to create a more closed canopy plant community with 40% will be planted in large patches of Sitka Spruce, Shore Pine, Evergreen Huckleberry, Salal, Salmonberry, Hookers Willow, and Pacific Wax Myrtle. The remaining 60% of the area between the patches of woody species will be planted with American Dune grass and associated native perennial species including Coastal Strawberry, Beach Pea, and Shoreline lupine. Most roadside areas currently exist as rock revetment, but disturbed vegetated areas will be restored using native and naturalized woody and herbaceous vegetation to meet the intent of the WSDOT Roadside Policy requirements and all applicable environmental permits to restore roadside and environmental function and blend the project corridor into the adjacent community.

The site would be monitored for a minimum of 10 years to meet established WSDOT performance standards including survival, cover, and the presence of non-native weed species. WSDOT would conduct seasonal weed control and replanting activities and annual scientific monitoring throughout that period.

5. Animals

a. Circle any birds and animals which have been observed or known to be on or near the site:

Birds: hawk, heron, eagle, songbirds, other: Snowy Plover and Streaked Horned Lark

Mammals: deer, bear, elk, beaver, other: coyote, rabbit, squirrel, marine mammals

Fish: bass, salmon, trout, herring, shellfish, other: species found in the Pacific Ocean

b. List any threatened or endangered species known to be on or near the site.

The USACE is the lead federal agency responsible for compliance under the ESA. WSDOT has undergone early coordination under ESA with the United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) on November 21, 2019. WSDOT has prepared a Biological Assessment in anticipation for informal NMFS consultation and formal USFWS consultation.

Species present on or near the site and their corresponding critical habitat determined to likely be adversely affected includes western snowy plover (*Charadrius nivosus nivosus*) and streaked horned lark (*Eremophila alpestris strigata*). The project is not likely to adversely affect marbled murrelet (*Brachyramphus marmoratus*), Lower Columbia River Chinook (*Oncorhynchus tshawytscha*), Lower Columbia River steelhead (*O. mykiss*), Lower Columbia River coho (*O. kisutch*), Columbia River chum (*O. keta*) and designated critical habitat for these species. The project will have no effect on all other ESA listed species.

c. Is the site part of a migration route? If so, explain

Yes, the site is part of the Pacific Flyway migration route. The Willapa Bay shoreline is a migratory route for shorebirds, especially during spring migration. Similarly, the Bay's shallower waters provide pupping grounds for harbor seals. Eulachon migratory corridors are present in the project area.

d. Proposed measures to preserve or enhance wildlife, if any:

The project will implement all reasonable and prudent measures outlined in the USFWS Biological Opinion to minimize adverse impacts to ESA listed Species. Because in-water work will be minimized to the greatest extent possible, fish exclusion and handling are not anticipated.

Snowy Plover and Streaked Horned Lark Protection Plan

WSDOT will be implement a Snowy Plover and Streaked Horned Lark Protection Plan prior to the start of construction and throughout the duration of the contract when species may be present. The Protection Plan will outline protocols and contingency plans in the event nesting plovers or larks and/or non-fledged chicks are present on the project site during construction.

Avoidance and Preservation Measures will include:

- All project work will comply with the terms and conditions of a Hydraulic Permit Approval issued by WDFW for the work.
- All work will occur during the approved IWWW for saltwater (June 16th to February 15th). In-water work will be performed during low tide and minimized to the extent feasible.
- All equipment that operates below OHWM will follow WSDOT Standard Specification 8-01.3(1)C6 Environmentally Acceptable Hydraulic Fluid.
- A SPCC Plan will be implemented to minimize the risk of petroleum products, hydraulic fluid, pH modifying material, sediment, or other toxic or deleterious materials entering receiving waters.
- Fill material will be placed according to design and not randomly dumped.
- Equipment operating below OHWM will be checked daily for leaks and inspected to ensure that it is clean and free of external petroleum-based products.
- Stationary equipment, such as generators, within 50 feet of waters of the state will be diapered or otherwise contained as approved by WSDOT.
- An equipment staging area will be selected by the contractor. Existing paved and gravel areas located on WSDOT Parcel 14110442019 will be available for vehicle staging area during construction.
- Equipment fueling and maintenance will occur at least 200 feet from sensitive areas.
- Water quality will be protected (i.e., silt fences, sandbags and wattles); and
- Only native vegetation will be use throughout the on-site restoration.

e. List any invasive animal species known to be on or near the site.

No invasive animal species were observed on or near the project site.

6. Energy and natural resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Above ground utilities exist within the project's APE. The Contractor is anticipated to import electricity, gasoline and diesel during construction.

a. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

It is highly unlikely that the project will affect the potential use of solar energy by adjacent properties. No solar panels currently exist, and standard residential solar panel installs typically place those panels on existing structures.

b. What kinds of energy conservation features are included in the plans of this proposal?

List other proposed measures to reduce or control energy impacts, if any:

Energy conservation features for this project include minimizing haul distances when possible, adopting a no-idle policy, and the regular maintenance of machinery.

7. Environmental health

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.

There are no known environmental health hazards within the project limits. WSDOT will conduct an Asbestos Good Faith Investigation and Survey Report for this project prior to the construction phase to be included within the contract. Spills, fire, and/or explosions are always a risk whenever the project requires the transport, use and temporary storage of heavy equipment using petrochemical products. The Contractor is required to have an SPCC Plan in place to address spills during construction. WSDOT does not anticipate discovery of any hazardous waste during construction, however, in the event any waste is discovered, the appropriate cleanup and removal methods outlined in the SPCC Plan will be followed.

b. Describe special emergency services that might be required.

WSDOT's Incident Response and local emergency responders will be called in the event of an emergency. Washington State Patrol and the Department of Ecology will be notified in the event of an accidental spill.

c. Proposed measures to reduce or control environmental health hazards, if any:

The contractor will be required to develop and implement a SPCC plan and dispose of any project waste at an approved and permitted disposal site. Any unanticipated HazMat discovery will be handled in accordance with the Department of Ecology hazardous material abatement procedures.

8. Noise

a. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

The primary noise source throughout the study area is from vehicles traveling SR 105 north and southbound as well as traffic on local roads. Temporary noise from construction, including construction traffic, and material movement around staging areas may temporarily produce elevated noise during the project construction.

b. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Heavy equipment and trucks and movement of project materials will generate noise during active construction, daylight hours on weekdays and some weekends. Some nighttime construction may be necessary while working during low tide. Noise levels will return to ambient levels outside construction periods and at the end of construction.

The Project will not add capacity to the existing SR 105 infrastructure; therefore, the project will not have long-term noise impacts. In addition, there will be temporary noise level increases due to construction activities, which will occur during both day and nighttime hours. Noise will be generated by construction equipment including trucks, forklifts, asphalt grinding machines, dozers, excavators, backhoes, loaders, and generators, which can reach levels from 73 dBA to 93 dBA at 50 feet. Construction will comply with federal, state, and local noise regulations.

c. List proposed measures to reduce or control noise impacts, if any:

Construction will comply with federal, state, and local noise regulations. All trucks and equipment on the project will be required to have adequate mufflers as installed by the manufacturer. The Contractor will employ noise BMPs as part of our construction contract to reduce/control noise impacts. Temporary noise during construction will be reduced through measures such as the use of ambient sensitive backup warning devices on construction vehicles, avoiding excessive tailgate banging, turning off construction equipment during prolonged periods of non-use, and providing a WSDOT complaint number.

9. Land and shoreline use

a. What is the current use of the site and adjacent properties?

SR 105 is a main transportation corridor to and along the Pacific Coast. In the project area, adjacent property is primarily Willapa Bay beach and forested areas. Further to the east and west, land use along SR 105 includes rural residential, open space, commercial land use, agricultural areas for cranberries, shellfish flats, pastures for cattle/dairy cows, and undeveloped forested areas, some harvested for commercially timber.

b. Has the site been used for agriculture? If so, describe.

No agricultural land or forest land of long-term commercial significance will be converted to other uses as a result of the proposed project.

c. Describe any structures on the site.

Utilities, SR 105 roadway embankment, paved roadway, existing revetments and guardrails are located in the project area. There are no other structures located within the Graveyard Spit project area.

d. Will any structures be demolished? If so, what?

No structures will be demolished because of this project. Existing guardrail adjacent to the southbound lane of SR 105 may be required to be dismantled and re-installed during construction.

e. What is the current zoning classification of the site?

The SR 105 WSDOT right of way is not a zoned parcel, as it is a transportation corridor. Other parcels in the area are Rural and aquatic lands (**Figure 5**). Washington State Parks and Recreation has jurisdiction between Mean High Water and Mean Low Water under Seashore Conservation for areas not located on Reservation lands.

Zoning/Land Use per Pacific County Ordinance No. 184/184B/184C: <https://www.co.pacific.wa.us/>

f. What is the current comprehensive plan designation of the site?

The SR 105 WSDOT right of way is not included in the comprehensive plan designation, as it is a transportation corridor. More information can be found in the Pacific County Comprehensive Plan: <https://www.co.pacific.wa.us/ordres/2020-2040-CompPlan-FINAL.pdf>

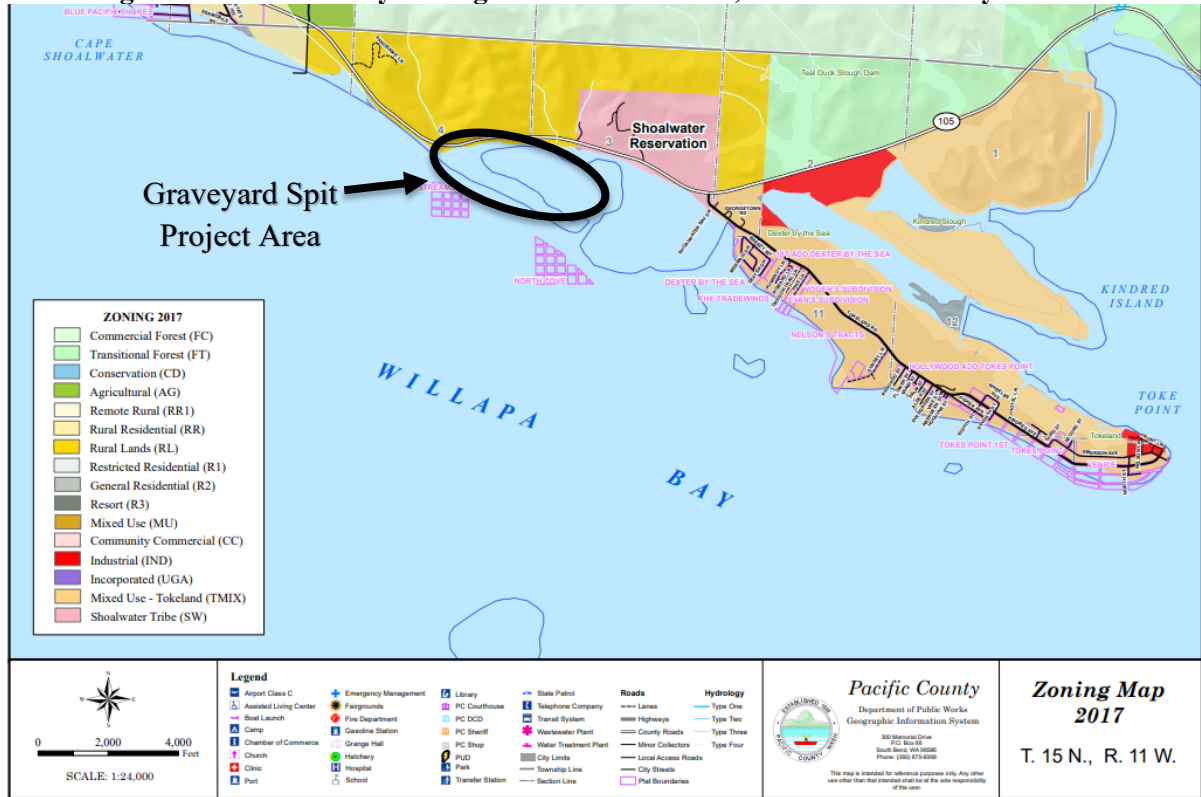
g. If applicable, what is the current shoreline master program designation of the site?

The project is within the Pacific Ocean and Willapa Bay are considered designated shoreline of statewide significance and designated Conservancy Shoreline. More information can be found in the Pacific County Shoreline Master Program - Pacific County Ordinance No. 183: <https://www.co.pacific.wa.us/>.

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.

Yes, the project is adjacent to the Willapa Bay and associated floodplain.

Figure 5. Pacific County Zoning Districts 2019 Atlas, North Cove Vicinity.



- i. **Approximately how many people would reside or work in the completed project?**
There are currently no persons living within the project area and no change is anticipated as a result of this project.
 - j. **Approximately how many people would the completed project displace?**
The project will not displace any people.
 - k. **Proposed measures to avoid or reduce displacement impacts, if any:**
This project will not include displacement impacts.
 - l. **Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:**
The project is compatible with Pacific County land use regulations and shoreline management plan to halt erosion at the Graveyard Spit. The purpose of the project is to restore the historical dune and protect the existing shoreline critical areas. If not for this project, the shoreline will continue to retreat and threaten the SR 105 infrastructure causing increased frequency of emergency events. This project fits under shoreline exemption for WSDOT projects per RCW 90.58.356(2)(d) for imminent threat of service to the SR 105 roadway.
- 9. Housing**
- a. **Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**
New housing units are not included in this proposal.

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

No housing units will be eliminated.

- c. Proposed measures to reduce or control housing impacts, if any:**

No measures to reduce or control housing impacts are proposed.

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

The tallest proposed structures may be a camera pole that will be approximately 20 feet tall located at the SR 105 roadway. WSDOT will install and maintain a camera throughout the winter for surveillance of the SR 105 roadway and Graveyard Spit Dynamic Revetment structure.

- b. What views in the immediate vicinity would be altered or obstructed?**

The view from SR 105 and the northern portion of the Shoalwater Bay Indian Tribal Reservation looking to the west over the Pacific Ocean may be obstructed by the +20 ft. tall dynamic revetment structure.

- c. Proposed measures to reduce or control aesthetic impacts, if any:**

The Project Office has coordinated with the WSDOT Regional Landscape Architect to minimize the visual impacts due to vegetation removal. Roadside restoration will be accomplished using native plants, which, when established, will reduce soil erosion and will out-compete many weeds and undesirable plants that would otherwise be mowed or sprayed. All disturbed areas will be restored with native vegetation as directed in the Critical Areas and Wetland Memorandum. Once the final plantings are complete, the Contractor and/or WSDOT will be responsible for plant establishment period of 10 years.

11. Light and glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?**

The project may produce temporary glare from vehicle windshields and reflections off metal machinery during construction. However, most construction activities will take place during the day.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?**

Temporary lighting and glare during nighttime construction will be limited to the SR 105 right of way, staging areas and within the project footprint on Graveyard Spit. Lighting and glare will be minimized to the maximum extent possible and should not result in safety hazards to the traveling public.

- c. What existing off-site sources of light or glare may affect your proposal?**

There are no existing on-site or off-site sources of light that may affect the proposal.

- d. Proposed measures to reduce or control light and glare impacts, if any:**

Appropriate measures to reduce temporary light glare impacts will be incorporated into the project design.

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?**

Recreational use is limited due to limited access within the project area. Observed activities at the graveyard spit include recreational fishing, birding, and running/walking. There is currently no vehicle access to the Graveyard Spit and limited access for WSDOT maintenance personnel to access behind the guardrail within the SR 105 right of way. Several existing unimproved gravel

shoulder areas are located on the waterward side of the southbound lane. Recreational vehicles may currently use these areas during the day to park and access the Pacific Ocean coastline by foot.

b. Would the proposed project displace any existing recreational uses? If so, describe.

All access will be restricted throughout construction. There is currently no vehicle access to Graveyard Spit and this project does not propose to change vehicle access to the area post-construction. General recreational use of the marine waters or Graveyard Spit will not change.

Although the Graveyard Spit has had no recorded nests in recent years, it is anticipated that post construction conditions will promote additional area that is suitable breeding and nesting habitat for ESA listed species including the Snowy Plover and Streaked Horned Lark. WSDOT and Ecology have coordinated efforts with the Shoalwater Bay Indian Tribe, USFWS and WDFW to develop the Projects Snowy Plover and Streaked Horned Lark Protection Plan to be used during construction. The BA and environmental documentation will also include long-term mitigation measures to limit public access to the area during times of the year when ESA listed species may be present. Additional signing may be required if Snowy Plover nesting sites are found during post-construction surveys. Standardize plover nesting area signage have been developed across agencies and the Shoalwater Bay Indian Tribe for uniformity of message (**Figure 6**).

Figure 6: Example Snowy Plover Nesting Area Signage (Agency and Tribal identification varies).



c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

Several existing unimproved gravel shoulder areas are located on the waterward side of the southbound lane of SR 105. Vehicles may currently use these areas during day to park and walk to the Pacific Ocean coastline by foot. WSDOT has “No Trespassing” and “No Overnight Parking” signs posted along this section of SR 105, adjacent to the project. The project is anticipated to include signage adjacent to the SR 105 for both detailed project information and posted restricted access areas related to ESA listed species and restoration areas.

13. Historic and Cultural Preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation register known to be on or next to the site? If so, generally describe.

There are no places or objects listed on, or proposed for, national, state, or local preservation register known to be on or next to the site.

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

Due to the dynamic erosive nature of the project area, it has been determined that there are likely no historic or archaeological resources located on Graveyard Spit or to be impacted during construction. A portion of the project footprint is within the Shoalwater Bay Indian Tribe reservation and parcel lands. The Shoalwater Bay Indian Tribe have identified culturally important sites adjacent to the project area. WSDOT Archeologists, in coordination with the Shoalwater Bay Indian Tribal Archeologists, conducted fieldwork for the Cultural Resource Survey on May 27, 2021, which confirmed that no sensitive areas will be impacted because of this project.

c. Proposed measures to reduce or control impacts, if any:

WSDOT initiated Section 106 and tribal consultation on October 15, 2020. WSDOT finalized the project's Short Report No. 21 – 03 on September 24, 2021 and distributed the Report to the consulting Tribes on October 24, 2021. Based on the results of this survey, WSDOT recommends that no historic properties will be affected by the project.

The Shoalwater Bay Indian Tribe will be invited to the pre-construction meeting with the Contractor where the preliminary project schedule will be discussed. Based on the cultural resource survey and consultation with Tribes on the project, construction monitoring is not anticipated.

An Unanticipated Discovery Plan (UDP) will be prepared by WSDOT with relevant contact information to utilize in the event that an inadvertent discovery is made during project construction. If cultural resources are discovered during construction excavation, all construction activity in the immediate area will stop to allow a qualified archaeologist to accurately access the context and integrity of the find. Washington State statutes RCW 7.44.055, 68.60.055, and 68.50.645 require any individual discovering human remains to report them to the coroner and local law enforcement officials.

14. Transportation

a. Identify public streets and highways serving the site and describe proposed access to the existing street system. Show on site plans, if any.

The current SR 105 is a vital route used for local traffic to travel from city of Tokeland and the Shoalwater Bay Tribal Reservation to the south to Grayland and North Cove located to the north of the project. State Route 105 will remain open to traffic during construction. Intermittent lane closures of SR 105 may occur with the movement of construction vehicles.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

No, the project area is not currently served by public transit.

c. How many parking spaces would the completed project have? How many would the project eliminate?

This project will not add or eliminate parking spaces.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

The proposed project will not add capacity to the existing SR 105 or the local road system.

e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

The project will not include water, rail, or air transportation.

- f. **How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.**

No increase in vehicular trips per day will occur because of this project.

- g. **Proposed measures to reduce or control transportation impacts, if any:**

A traffic control plan will be developed and included in the contract. During construction, there will be intermittent delays and single lane closures on SR 105. To reduce transportation impacts during construction, equipment will be staged within the project vicinity and advance warning of any closures will be provided to the traveling public.

15. Public services

- a. **Could the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe.**

The completed project will not result in an increased need for public services.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

The project will maintain all required safety standards on the project to reduce the risk of accidents. Coordination with emergency services will minimize delays in response time during construction. WSDOT frequently utilizes press releases, project websites and other social media to help communicate about project construction.

16. Utilities

- a. **Circle utilities currently available at the site:** electricity and telephone.

- b. **Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.**

This project does not propose new or changes to existing utilities.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: Angie Haffie
Angie Haffie, WSDOT Southwest Region Environmental Manager

Date: June 23, 2022