



## MEMORANDUM

**To:** SR 520 Program Files

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

**Date:** April 9, 2014

**Copies To:** Dawn Yankauskas, WSDOT SR 520 I-5 to Medina: Bridge Replacement and HOV Project Engineer;  
Dave Edwards, WSDOT SR 520 West Approach Bridge North Project Engineer;  
Margaret Kucharski, WSDOT SR 520 Environmental Lead;  
Rona Spelleccacy, SR 520 Environmental Planner

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**Subject: SR 520, I-5 to Medina: Bridge Replacement and HOV Project –  
West Approach Bridge North – Design Refinement at Foster Island**

The purpose of this memorandum is to document National Environmental Policy Act (NEPA), State Environmental Policy Act (SEPA), Endangered Species Act (ESA), and Section 106 and 4(f) compliance for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project associated with a West Approach Bridge North (WABN) design refinement at Foster Island.

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

WSDOT has made a refinement to the WABN design at Foster Island, which is needed to remedy safety concerns related to maintaining Automated Traffic Management (ATM) equipment. Up to 30 linear feet of 18 inch-wide trenching to a depth of 2.5 feet is proposed within right-of-way south of existing SR 520 to install the ATM equipment. This change would

allow for the new equipment to be housed in the existing ATM cabinet, which is safely located behind guardrail on Foster Island.

The proposed change is located within the existing Area of Potential Effects (APE). Archaeological investigations have been previously conducted in this area, and the area was determined to have been disturbed by the initial construction of SR 520 in the early 1960s. Because of identified sensitivities related to the Foster Island Traditional Cultural Property, WSDOT proposes to have a qualified archaeologist monitor the proposed trenching activity.

### **Consistency with Environmental Documentation**

FHWA and WSDOT evaluated the proposed changes to the WABN phase and potential changes to environmental effects as described in the Final EIS. FHWA and WSDOT concluded that no additional adverse effects beyond those described in the Final EIS and ROD would result from the changed conditions.

WSDOT has determined, on behalf of FHWA, that the proposed change would not cause an additional adverse effect to historic properties. Per the project's programmatic agreement commitments including the *Foster Island Treatment Plan*, WSDOT, on behalf of FHWA, consulted with the State Historic Preservation Officer (SHPO) and consulting parties on the proposed change. The parties agreed that proposed change described above would not result in additional adverse effects to historic properties. Concurrence was received from SHPO on March 18, 2014 (see attachment).

A WSDOT Cultural Resources Specialist has determined that no additional analysis or consultation is necessary for Section 106 compliance or Section 4(f) compliance related to historic properties as a result of the proposed change.

A WSDOT biologist has reviewed the proposed change and determined no additional analysis is necessary for Endangered Species Act compliance.

The project remains compliant with current federal, state, local, and departmental regulations and directives with regard to NEPA/SEPA processes, Section 106, 4(f) and 6(f), and the Endangered Species Act. No additional environmental review is required.

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

Region / Mode Official

AMK MITANG

Date

4/9/14

FHWA Official

Anthony Sauer

Date

4/9/14

**Attachment**

Section 106 Correspondence



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

March 18, 2014

RECEIVED

MAR 21 2014

AWV Facilities Team

Mr. Steve Archer  
Cultural Resource Specialist  
SR 520 Bridge Replacement Project  
999 Third Ave., Suite 2424  
Seattle, WA 98104

In future correspondence please refer to:

Log: 121602-08-FHWA

Property: SR 520 Corridor Trans-Lake Washington, Bridge Replacement and HOV

Re: ATM Trenching on Foster Island, Continued No Adverse Effect Concurrence

Dear Mr. Archer:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) and providing information on the proposed trenching in support of Automated Traffic Maintenance (ATM) hardware on Foster Island. The project information has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800.

- Please ensure, as stated in your correspondence, that all ground-disturbing activities are monitored by a professional archaeologist.

I concur that the proposed ATM installation project will have no adverse effect on any National Register of Historic Places eligible or listed resources. If additional information on the project becomes available, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

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





**Washington State  
Department of Transportation**

**Lynn Peterson**  
Secretary of Transportation

**SR 520 Bridge Replacement and HOV Program**  
999 3rd Avenue, Suite 900, MS: NB82-99  
Seattle, WA 98104

Phone: 206-770-3500 / Fax: 206-770-3569  
TTY: 1-800-833-6388  
[www.wsdot.wa.gov](http://www.wsdot.wa.gov)

March 7, 2014

LTR - 2497

Allyson Brooks, Ph.D.  
State Historic Preservation Officer  
Director, Department of Archaeology and Historic Preservation  
1063 S. Capitol Way, Suite 106  
Olympia, WA 98504-8343  
MS-48343

RE: SR 520, I-5 to Medina Bridge Replacement Project and HOV Project: Additional Updated Limits of Construction for the West Approach Bridge North Construction Phase

LOG #: 121602-08-FHWA

Dear Dr. Brooks,

Pursuant to the *Programmatic Agreement Implementing Section 106 of the National Historic Preservation Act for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project (PA)*, the Washington State Department of Transportation (WSDOT), on behalf of the Federal Highway Administration (FHWA), is continuing consultation on this project.

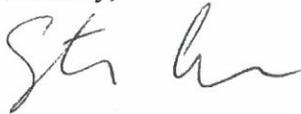
Following our last correspondence, the final design of the West Approach Bridge North (WABN) construction phase of the above-referenced project has resulted in one additional change within the existing Area of Potential Effects (APE) on Foster Island. WSDOT has determined, on behalf of FHWA, that this additional refinement will not cause an additional adverse effect to historic properties. Per the project's programmatic agreement commitments including the *Foster Island Treatment Plan*, we are consulting on the additional design refinement. This information is also being shared and comment is requested from the Federally recognized tribes consulting on this project.

The change is needed to remedy safety concerns related to maintaining Automated Traffic Maintenance (ATM) equipment. The equipment would be housed in the existing ATM cabinet, which is safely located behind guardrail on Foster Island. To install this equipment, up to 30 linear feet of 18 inch-wide trenching to a depth of 2.5 feet is proposed within right-of-way south of existing SR 520. This area has previously been archaeologically evaluated and determined to have been disturbed by the initial construction of SR 520 in the early 1960s. Because of identified sensitivities related to the Foster Island Traditional Cultural Property, WSDOT proposes to have a qualified archaeological monitor observe this trenching activity.

We respectfully request any comments you may have on the above modification and your concurrence with the determination that the change results in *no additional adverse effect* to historic properties by no later than **April 7, 2014**.

If you have any questions or concerns, please contact me at (206) 805-2895, e-mail [archers@wsdot.wa.gov](mailto:archers@wsdot.wa.gov), or Allison Hanson, Environmental Director for Mega Projects at (206) 805-2880, e-mail [hansona@wsdot.wa.gov](mailto:hansona@wsdot.wa.gov).

Sincerely,

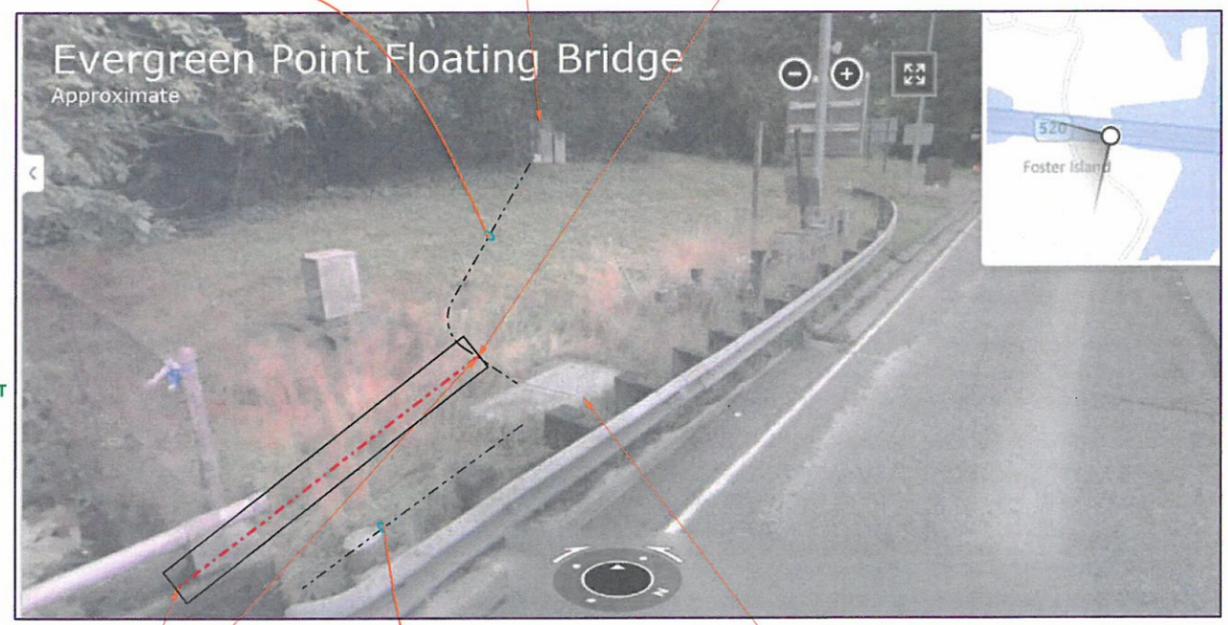
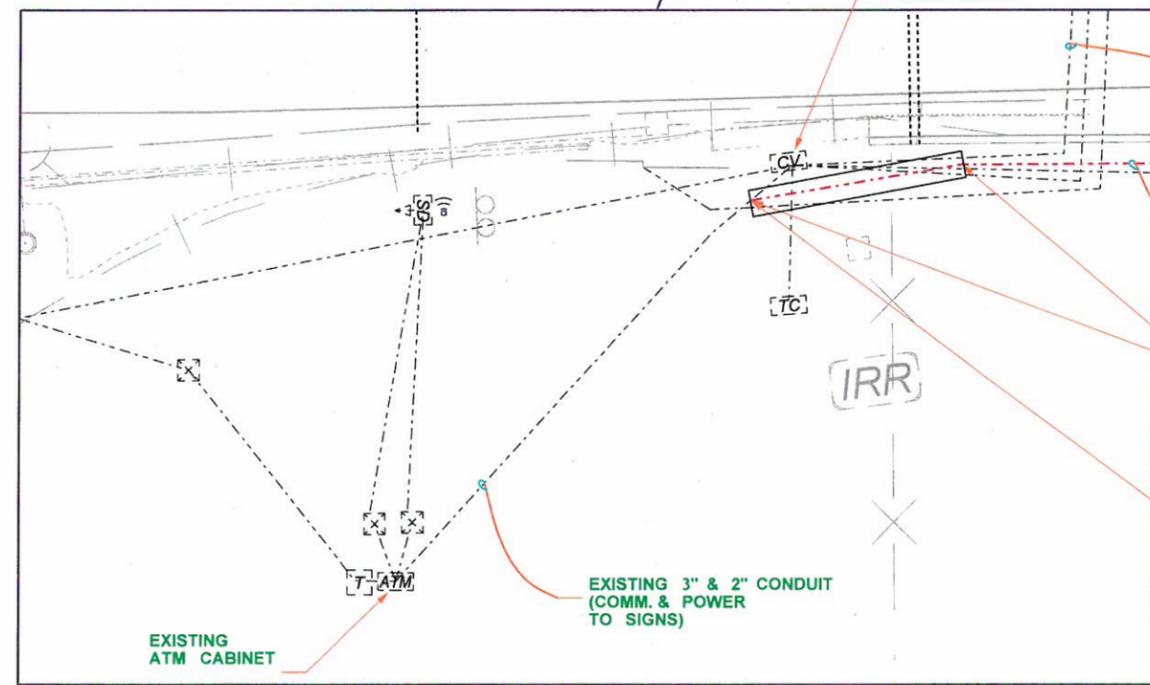
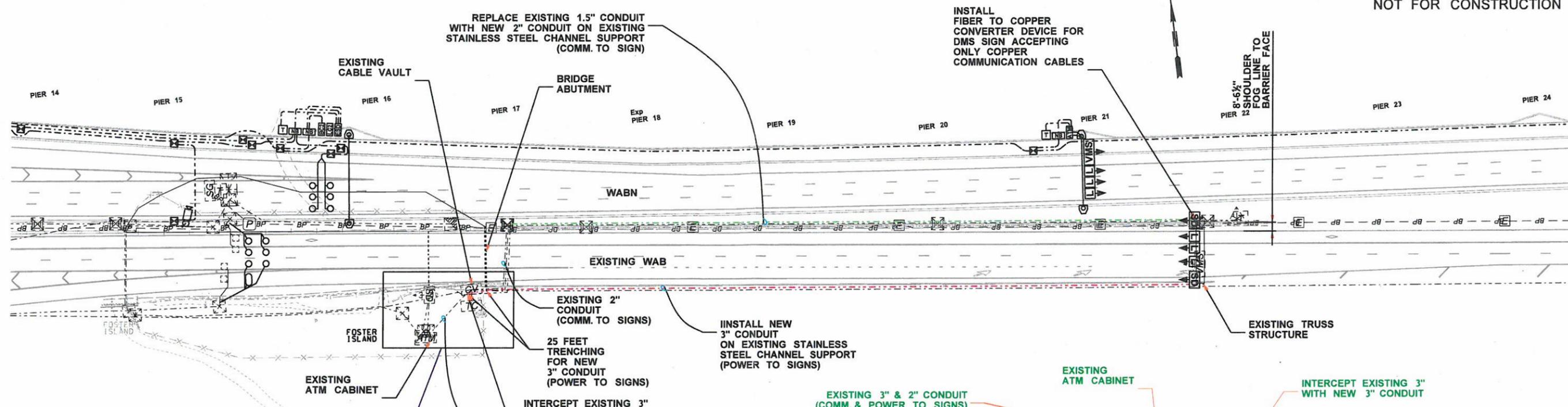
A handwritten signature in black ink, appearing to read "Steve Archer". The signature is fluid and cursive, with the first name "Steve" being more prominent than the last name "Archer".

Steve Archer  
WSDOT Cultural Resources Specialist

Attachments

Cc: Matthew Sterner, DAHP  
Anthony Sarhan, FHWA  
Allison Hanson, WSDOT  
Scott Williams, WSDOT

**PRELIMINARY**  
NOT FOR CONSTRUCTION



FILE NAME C:\Users\ChITA\Desktop\proof workfolder\PE2344_WABN_DE_TS_FOSTER.dgn		REGION NO. 10		STATE WASH		FED.AID PROJ.NO.		SR 520		MONTLAKE TO EVERGREEN PT. BRIDGE		PLAN REF. NO. TSD##	
TIME 4:17:23 PM		JOB NUMBER 13A012		CONTRACT NO.		LOCATION NO.		Department of Transportation		WEST APPROACH BRIDGE NORTH		SHEET	
DATE 2/24/2014		DATE		DATE		DATE		Washington State		ITS FOSTER ISLAND TRENCHING		OF	
PLOTTED BY chita		DATE		DATE		DATE		Department of Transportation		ITS FOSTER ISLAND TRENCHING		SHEETS	
DESIGNED BY T. CHI		REVISION		DATE		BY		Department of Transportation		ITS FOSTER ISLAND TRENCHING		SHEETS	
ENTERED BY T. CHI		REVISION		DATE		BY		Department of Transportation		ITS FOSTER ISLAND TRENCHING		SHEETS	
CHECKED BY D. SIMS		REVISION		DATE		BY		Department of Transportation		ITS FOSTER ISLAND TRENCHING		SHEETS	
PROJ. ENGR. D. EDWARDS		REVISION		DATE		BY		Department of Transportation		ITS FOSTER ISLAND TRENCHING		SHEETS	
REGIONAL ADM. J. MEREDITH		REVISION		DATE		BY		Department of Transportation		ITS FOSTER ISLAND TRENCHING		SHEETS	