



RIDGEFIELD COMMUNITY DEVELOPMENT DEPARTMENT

REVISED

**SEPA THRESHOLD DETERMINATION: MDNS
RIDGEFIELD RAILROAD OVERPASS (RROP)/MAIN**

AVENUE INTERSECTION: SEPA PLZ-08-0033
301 N 3rd St. ♦ PO Box 608 ♦ Ridgefield, WA 98642
Ph: 360.887.3908 ♦ Fax: 360.887.2507 ♦ www.ci.ridgefield.wa.us

TAKE NOTICE:

The purpose of this revised MDNS is to amend the proposed mitigation measures in response to the comments received during the public comment period.

Proponent: The Port of Ridgefield submitted a SEPA checklist on June 4, 2008 for the purpose of constructing an overpass extension from Pioneer Street westward onto the Lake River waterfront and for making improvements to the intersection of Pioneer Street and Main Avenue. The SEPA Checklist was amended to include the South Main Avenue Intersection on July 30, 2010. The proposed project area is wholly within the corporate limits of the city of Ridgefield, WA (city).

Description of Proposal: The project is known as the “*RROP/Main Avenue Intersection*” project. The project construction schedule is dependent upon funding. The project received a Class II Categorical Exclusion under the NEPA on February 1, 2008 from the Washington State Department of Transportation. Project activities will include: Clearing & Grading, Bridge Construction, Roadway Grading, Paving, Delineating Roadway, Installation of Safety Appurtenances, Traffic Signalization, and Street Parking. South Main Avenue will be converted to a one-lane, one-way south with angled parking on the west side and a sidewalk bulb will be added to the southwest corner of the intersection.

Location: The project is located beginning at the western terminus of State Route 501 (MP 16.91) in downtown Ridgefield and on property owned by the Port of Ridgefield. It begins at the intersection of Main Avenue/Pioneer Street and goes westward over the BNSF mainline, northward along the western base of the railroad grade and terminates at Division Street. The project also extends from the intersection of Main Avenue/Pioneer Street along south Main Avenue approximately 200 feet. Section 24 T4N R1W Willamette Meridian, Ridgefield, WA.

Project Proponents & City Contact Persons:

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Lead Agency: The lead agency for this proposal has determined that the proposal does not have a probable significant adverse impact on the environment as a result of compliance with adopted City standards and particular mitigation measures. 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. Project information is available for review at City Hall during normal business hours.

The original Mitigated Determination of Non Significance (**MDNS**) was issued under WAC 197-11-340(2) on February 9, 2011. The public comment period closed on March 9, 2011. The lead agency considered the public comments and has revised the mitigation measures WR 3 and HM 2. The revised MDNS is being circulated to agencies with jurisdiction. [WAC 197-11-340(2)(f).] There is no additional public comment period for the revised MDNS.

APPEAL: An appeal of the city's SEPA Threshold Determination must be submitted to the Community Development Department within thirty (30) calendar days after the date issued. This appeal must be written and make specific factual objections to the city's threshold determination. Appeals shall be conducted in conformance with RDC 18.810.205 (Appeals) and any required fees pursuant to RDC 18.810.205.F shall be paid at time of appeal submittal.

Justin Clary, Ridgefield City Manager

Issued: February 9 2011
Revised: March 16, 2011

Existing environmental documents:

The following documents were prepared for, submitted to, and approved by the Washington Department of Transportation (WSDOT) and US Department of Transportation Federal Highway Administration (FHWA) under the National Environmental Policy Act (NEPA). Signatory approval was issued under NEPA by FHWA on March 24, 2008.

- Ash Creek Associates, Inc. 2007. Design Level Geotechnical Engineering Study. Ridgefield Rail Overpass Project. Ridgefield, Washington. Portland, Oregon.
- Ash Creek Associates, Inc. 2007. Letter report from Herbert F. Clough to Edward Blodgett, Jacobs, Inc. entitled "REVISED Hazardous Materials Review – Soil and Groundwater Contamination. Ridgefield Rail Overpass Project, Ridgefield, Washington" and dated August 22, 2007. Portland, Oregon.
- Heritage Research Associates, Inc. (HRA). 2007. Cultural Resources Assessment for the Ridgefield Rail Overpass Project, City of Ridgefield, Clark County, Washington. HRA Report No. 312 (Confidential Document: Not for Public Disclosure). Eugene, Oregon.
- Hopper Dennis Jellison, PLLC. 2007. Preliminary Traffic Study. Analysis of Alternatives Pioneer Street, Mill Street, and Division Street. Updated July 10, 2007. Vancouver, Washington.
- Hopper Dennis Jellison, PLLC. 2007. Type A Hydraulic Report. Ridgefield Rail Overpass Project in Ridgefield, Clark County, Washington. August 14, 2007. Vancouver, Washington.
- Hopper Dennis Jellison, PLLC. 2007. Utilities Technical Memorandum. Ridgefield Rail Crossing. Updated July 10, 2007. Vancouver, Washington.
- Jacobs, Inc. 2007. Air quality memorandum from Ed Blodgett dated August 10, 2007. Portland, Oregon.
- Jacobs, Inc. 2007. Energy memorandum from Ed Blodgett dated September 7, 2007. Portland, Oregon.
- Jacobs, Inc. 2007. Preliminary Type, Size and Location Report. September 2007. Portland, Oregon.
- Michael Minor and Associates. 2007. Traffic Noise Technical Study. Ridgefield Rail Overpass. Portland, Oregon.
- Normandeau Associates, Inc. Memorandum from Kent E. Snyder to Ed Blodgett, Jacobs, Inc., dated July 30, 2010.

- Normandeau Associates, Inc. 2007a. Biological Assessment for the Ridgefield Rail Overpass Project, Ridgefield, Washington. Vancouver, Washington.
- Normandeau Associates, Inc. 2007b. Socio-Economic and Environmental Justice Technical Memorandum. Ridgefield Rail Overpass Project, Ridgefield, Washington. Vancouver, Washington.
- Normandeau Associates, Inc. 2007c. Visual Quality Technical Memorandum. Ridgefield Rail Overpass Project, Ridgefield, Washington. Vancouver, Washington.
- Normandeau Associates, Inc. 2007d. Water Resources Report. Ridgefield Rail Overpass Project, Ridgefield, Washington. Vancouver, Washington.
- Normandeau Associates, Inc. 2008. Alternatives Analysis Technical Memorandum. Ridgefield Rail Overpass Project, Ridgefield, Washington. Vancouver, Washington.
- Normandeau Associates, Inc. 2008. Biology/Wetland Technical Memorandum. Ridgefield Rail Overpass Project, Ridgefield, Washington. Vancouver, Washington.
- Normandeau Associates, Inc. 2008. Land Use Technical Memorandum. Ridgefield Rail Overpass Project, Ridgefield, Washington. Vancouver, Washington.

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Public Comment

The City published the notice of the proposed MDNS , as required and conducted an Open House on February 7, 2011 for the Overlook Park during which time project representatives encouraged feedback from the public. The following persons or agencies responded in writing:

Edward Blodgett

Mr. Blodgett, a project representative working for Jacobs Engineering, filed a report after the conclusion of the Overlook Park Open House. His report comments are included within the response to Mr. Chenoweth below.

Todd Chenoweth.

Comment: Mr. Chenoweth attended the February 7th Open House and spoke with Edward Blodgett, Project Representative. Thereafter Mr. Chenoweth submitted a comment letter to the City in which he raised the following concerns:

- (1) Converting South Main Avenue into a one-south bound way street will inconvenience the neighborhood. Trucks, some as large as 53 feet, delivery goods to his store from South Main Avenue. Mr. Chenoweth is concerned that the one-way street will disrupt park activities and cause congestion on the street.
- (2) In general, Mr. Chenoweth would like to see parking better managed downtown. He suggests that a portion of his 12-foot sidewalk along South Main could be converted into angle parking.

Response: The turn movement Design Vehicle chosen for the project is a motor home with trailer, with a WB-40 and WB-50 wheel track. This is comparable to a larger truck and trailer. Therefore, delivery of goods from large truck and trailers should not present a congestion problem.

Mr. Blodgett Also considered the feasibility of converting a portion of the South Main Avenue right-of-way into angled parking. Assuming the right-of-way is 36 feet, the angled parking on the west side of Main Avenue will be 18 feet and the one-way travel lane will be 12 feet, Mr. Blodgett determined that only six feet remains for angled parking. Even with removal of a portion of the eastern sidewalk and using 45 degree rather than 60 degree angled parking there is insufficient width in the South Main Avenue right-of-way to accommodate angled parking.

Mary C. Bodine

Comment: Ms. Bodine owns the Ridgefield Living Center located immediately northwest of the intersection of Pioneer and Main Avenue. Ms. Bodine wrote that she is concerned that the bridge and intersection improvements will have “a negative impact on the most important aspect of my land, “the view”. She is concerned that the bridge height and declination will “completely obscure the only panoramic view of the marina and wildlife refuge ... in Ridgefield ” Ms. Bodine stated that she is concerned that the bridge will prevent future development on her land from accessing the view and that the proposal will devalue her land..

Response: As a component of the Railroad Overpass SEPA Checklist, Normandeu Associates prepared a “Visual Quality Technical Memorandum”. The memorandum applied the Visual Impact Assessment for Highway Project standards adopted by the Federal Highway Administration (FHWA) for Pioneer Street east of the railroad tracks. This stretch of roadway is classified as “urban”. The Normandeu study concluded that from the intersection of Pioneer and South main, the view westward has average vividness, a moderately low degree of intactness and unity and moderately low visual quality. The Normandeu study did not classify the view from Ms. Bodine’s private property.

The report provides a conceptual view of the overpass as seen from the intersection of Pioneer and South main (Page 20 & 20.) The report concludes that the new roadway will not significantly alter vividness, the man-made features will provide a more orderly unity of view, that there will be an increase of light and glare from traffic and street lights but that the visual quality will remain moderately low. The report did not consider impacts to visual quality from Ms. Bodine’s property.

The City of Ridgefield does not currently regulate views from public or private property. Zoning in this area will allow commercial buildings 35 feet tall and proposed amendments to the zoning district may increase the building height to 60 feet. While the roadway will pass directly between Ms. Bodine’s property and the western view, district regulations will allow buildings tall enough to overlook the roadway to capture views to the west. In addition, implementation of mitigation measure VQ 1 and VQ 2 will mitigate potential impacts to the quality of the view from the intersection of Pioneer and South Main and from Ms. Bodine’s property.

Washington Department of Ecology

The Department submitted a letter dated March 10, 2011 which include the following comments:

◦ Toxics Cleanup:

There is known contamination on-site and within one-half mile of the proposed overpass. The Ecology Facility Site ID Numbers are:

- 1019, Pacific Wood Treating
- 8100630, Park Laundry
- 22484, Knapp Estate Property
- 1062, RJ Frank Property
- 1105153, Schaffer property

Environmental contamination, if encountered, should be managed to ensure that it does not spread to other media or off-site. Discovery and cleanup should be documented and reported to the Ecology site manager pursuant to the Model Toxics Control Act 173-340-300.

Only clean soil may be used as fill.

Equipment must be on-hand to contain and cleanup a release of oil or fuel from heavy equipment operation.

◦ Water Quality

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-210A, Water Quality Standards for Surface Waters for the State of Washington, and is subject to enforcement action.

Erosion control measures must be in place prior to any clearing, grading, or construction. These measures must be effective to prevent stormwater runoff from carrying soil or other pollutants into surface water or storm drains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered pollutants.

Dispose of construction debris on land in such a manner that debris cannot enter water the of the state and storm drains draining to waters of the state, or cause water quality degradation of state waters.

After completion of this project, there is likelihood that stormwater runoff will contain increased levels of grease, oils, sediment, and other debris. Stormwater treatment devices should be installed so that any discharge will be appropriately treated to remove these substances.

During construction, contain and remove all release of oils, hydraulic fluids, fuels, other petroleum products, paints, solvents, and other deleterious materials in a manner that will prevent their discharge to waters and soils of the state. The cleanup of spills should take precedence over other work on site.

Identify and field mark clearing limits and/or any easements or required buffers prior to the start of any clearing, grading, or construction. Appropriate methods include staking and flagging or highly visible fencing.

All types of sediment control, such as sediment ponds or traps, should be constructed as a first step in grading and be made functional before and upslope disturbance takes place.

Design all temporary erosion control systems to contain the runoff from the developed two-year, 24-hour design storm without eroding.

Minimize the tracking of sediment by construction vehicles onto paved public roads. Shovel or sweep deposited sediment every day. Water clean roads only after the area has been shoveled or swept.

If required, apply for and NPDES permit at least 60-days prior to discharging stormwater. See: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/-Application>

Response:

The Ecology letter raises issues that can be addressed via application and enforcement of existing City of Ridgefield codes and standards and via mitigation measures WR 1, WR2 and WR 3 and HM 2.

Mitigation Measures

General

G1. Compliance with City regulations, plans and standards. Unless otherwise specified herein, at the time of construction and at all times thereafter, the developer shall comply with all approval requirements established in applicable plans, policies, regulations and standards adopted at the

time of this application, including but not limited to, the Ridgefield Urban Area Comprehensive Plan (RUACP), the Ridgefield Capital Facilities Plan (RCFP), the Ridgefield Development Code (RDC), the Ridgefield Engineering Standards for Public Works Construction (Engineering Standards), current water and sanitary sewer plans, and the Stormwater Management Manual for the Puget Sound Basin (Puget Sound Manual).

- G.2 If a conflict arises between mitigation measure G1 and other mitigation measures, the City shall apply the more restrictive interpretation.

Land Use

Normandeau Associates, Inc. prepared a Land Use Technical Memorandum, dated January 25, 2008. The memorandum identified the zoning within the project area as Waterfront Mixed Use (WMU) west of the railroad tracks and Downtown Mixed Use, east of Railroad Avenue. Parts of the project area are considered environmentally sensitive by the City and the WDFW. Access onto Pioneer Street west of Main Avenue will be limited. Eight or more private properties will be directly affected by the RROP, including properties abutting Pioneer Street and Main Avenue, and properties owned by the Port of Ridgefield, the Union Pacific Railroad and the Oregon-Washington Railroad, and McCuddy's Marina.

- LU 1. Development of the RROP shall be subject to applying for and obtaining city permits for grading, critical areas, variances, easement and access and other applicable permits.
- LU 2. The project proponent and/or contractor of the RROP shall implement the mitigation measures contained in the Normandeau Land Use Technical Memorandum including Construction Activities (Section 5.1) and Operation and Maintenance (Section 5.2).
- LU 3. The project proponent shall prepare a traffic management plan and a public information plan, as proposed by Normandeau mitigation measure 5.1, sub 3, and a Pioneer Street traffic management plan for review and approval by the City Public Works Department, prior to implementation of the traffic management and public information plans.
- LU 4. The proposed noise level variance is not granted by this MDNS. Granting a noise variance is a discretionary City act dependent upon a demonstration of compliance with then existing applicable city regulations.

Geotechnical

Ash Creek and Associates, Inc. prepared a Design Level Geotechnical Engineering Study for the RROP project dated September 13, 2007. The study identifies the presence of moisture sensitive near surface soils and shallow groundwater over much of the site. The Ash Creek report strongly recommends site grading and utility trenching be conducted during the dry weather conditions, generally late June through late September.

- G. 1. Future development of the RROP shall be conducted consistent with the Conclusions and recommendations contained in the Ash Creek report, Section 8.0 – Conclusions and Recommendations, Sub-sections 8.1 through 8.13. Dry weather site grading and utility trenching is the City's preferred alternative.

Water Resources

Normandeau Associates, Inc. prepared a Water Resources Report for the RROP project dated October 11, 2007. Only one water body, Lake River, a Type S stream, is within the project area. The project area east of and including the railroad berm is outside the 100-year floodplain; west of the railroad berm, approximately 500 feet of the project roadway lies within the 100-year floodplain. Section 5 of the Normandeau report identifies implementation of multiple measures to mitigate project impacts to water resources and quality.

- WR 1. Future development of the RROP shall be conducted consistent with the Mitigation measures proposed in the Normandeau Water Resources report for Stormwater Retrofit (Section 5.1), Erosion and Sedimentation (Section 5.1.2), Hazardous Materials (Sections 5.1.3), Construction Activities (Section 5.1.4), and Operation (Section 5.2).
- WR 2. Storm Water Control: A storm water control system shall be constructed in accordance with the city's Engineering Standards that incorporate the Stormwater Management Manual for the Puget Sound Basin. Prior to soil disturbance or site construction, the developer shall prepare final stormwater management plans for review and approval by the City Engineer. Prior to soil disturbance the developer shall apply for an NPDES stormwater discharge permit and Stormwater Pollution Prevention Plan (SWPPP), if required.
- WR 3. Erosion Control: Site grading and erosion control measures shall include an engineered erosion control plan and shall identify BMPs for erosion and sediment control as identified by the City of Ridgefield and the WA State Department of Ecology in the SEPA Comment letter dated March 10, 2011 prepared in response to this MDNS.

Biology and Wetlands

Normandeau Associates, Inc. prepared a Biology/Wetland Technical Memorandum, dated February 13, 2008. Two vegetation types are present in the project area: Upland grassland and upland scrub-shrub vegetation. No TES species were found during site investigation. Lake River is a Type S fish-bearing stream. Wetlands include a small (0.03 acre) man-made swale - Category IV wetland – that conveys stormwater to Lake River and wetland fringe – Category IV – along the OHWM of Lake River.

- BW 1. The project proponent or developer shall apply for City Critical Area permits and shall implement mitigation measures consistent with the City's Critical Area regulations.
- BW 2. Future development of the RROP shall be conducted consistent with the Mitigation measures proposed in the Normandeau Biology/Wetland Technical Memorandum for Erosion and Sedimentation, Hazardous Materials, and Construction Operations.

Hazardous Materials

Ash Creek and Associates, Inc. prepared a Hazardous Materials review letter, dated August 22, 2007 to identify potential soil and groundwater contamination that might impact construction of the RROP.

- HM 1. Future development of the RROP shall be conducted consistent with the Ash Creek Recommendation #1 and 3 pertaining to right of way acquisition and #5 pertaining to project bid packets.
- HM 2. There is known contamination on-site and within one-half mile of the proposed overpass. Environmental contamination, if encountered, should be managed to ensure that it does not spread to other media or off-site. Discovery and cleanup should be documented and reported to the Ecology site manager pursuant to the Model Toxics Control Act 173-340-300. Only clean soil may be used as fill. Equipment must be on-hand to contain and cleanup a release of oil or fuel from heavy equipment operation.

Traffic

Hopper Dennis Jellison P.LLC prepared a Preliminary Traffic Study dated June 15, 2006 and updated July 10, 2007. The RROP project will shift the traffic access point from the at-grade crossings at Mill and Division streets to the intersection of Pioneer Street and Main Avenue. The Preliminary Traffic Study for the project indicates that future build-out of the waterfront may generate 1,287 new adjusted PM peak hour trips, all of which would travel through the intersection of Pioneer and Main. (The volume of traffic

equates to one vehicle passing by City Hall every 2.8 seconds during the PM peak period.) The current transportation element of the Ridgefield Capital Facilities Plan (CFP) does not anticipate this volume of trips being generated by waterfront development.

- T 1. To ensure that vehicular and pedestrian safety concerns are adequately considered, future land use development that generates more vehicle trips than the amount anticipated in the adopted CFP and which proposes, to access the intersection of Pioneer Street and Main Avenue or the Pioneer Street corridor from Main Avenue to 9th Street shall be required to conduct or participate in, (if there are other parties also required to participate in the study at the time of development) a Pioneer Street traffic impact analysis and corridor safety analysis that includes, at a minimum, the corridor between the intersections of Pioneer Street and Main Avenue and Pioneer Street and 9th Avenue. The City shall specify the scope of the analysis at the time of future land use application.
- T 2. The project proponent, subject to City concurrence, shall implement the mitigation measures the City deems necessary to provide for public health safety and welfare and which implement the City's Comprehensive Plan polices pertaining to small town or Main Street character and pedestrian friendly development.
- T 3. If the project proponent desires to construct a road section that varies from the City of Ridgefield's adopted standards, the project proponent shall be required to apply for and satisfy the approval criteria for a design modification from city road standards.

Noise

Michael Minor & Associates prepared a Traffic Noise Technical Study for the RROP dated August 2007. Noise will be generated during construction and during use of the RROP. Future noise levels along Pioneer Street resulting from RROP traffic may reach 67-70 dBAL_{eq}, exceeding WSDOT criteria. An estimated 50 residences will experience traffic noise levels that exceed established traffic noise criteria. The primary noise impact will be felt by residents along Pioneer Street east of Main Avenue, Pioneer Street west of Main Avenue, Ridgefield Village View, boat houses nearest the RROP and, to a lesser extent along Railroad Avenue. (Page 15 & 16) The report concludes that, based upon WSDOT feasibility and/or reasonability criteria, noise barrier walls are not recommended for the floating home area, Railroad Avenue homes, and the Ridgefield Village View development. The significant noise impacts for these areas are reported as being 'unavoidable' and the report offers no noise reduction mitigation measures for operation of the RROP.

- N 1. Project Construction Mitigation. The contractor shall implement the construction mitigation measures described in Section 8.2 of the Michael Minor report. Granting a noise variance is a discretionary act on the part of the City.
- N 2. Prior to soil disturbance, the RROP proponent and developer shall contact all property owners and residents in the project area – from 9th Street to Main Avenue along Pioneer Street, Pioneer Street west of Main Avenue, Railroad Avenue and the floating home area to explain the unavoidable noise impacts the property owners or residents will experience when the RROP is completed.

Archaeology and Cultural Resources

The Washington Department of Archaeology and Historic Preservation, in a letter dated January 2, 2008, determined that there are no known historic properties affected by the proposed RROP project.

- A 1. Archaeological or cultural resources, if discovered during or after project development shall be reported to the state Office of Archaeology and Historic Preservation (OAHP) within 24 hours of discovery. The developer shall not undertake any soil disturbance or development activities within a 100 foot radius of any newly discovered resource until the developer, the primary

official, and the OAHF have concurred that work may resume as planned or subject to mitigation plan crafted for that newly discovered archaeological resource.

Housing & Socio-Economic & Environmental Justice

Normandeau Associates, Inc. prepared a Socio-Economic and Environmental Justice Technical Memorandum, dated October 11, 2007. The memorandum considers the construction and operational impacts of the RROP on the general quality of life in the central core of Ridgefield. The most significant impacts the RROP would have on quality of life would be Pioneer Street-Main Avenue intersection, Pioneer Street west of Main Avenue and McCuddy's Marina. Construction related impacts include traffic construction noise, traffic and pedestrian delays during construction, access to private property, equipment noise, vehicle and light illumination, and dust emissions. Long term significant adverse impacts relate to noise, light and glare generated by use of the RROP. There are no identified impacts relating to social justice.

- HSJ 1. During construction, the project proponent and developer shall implement the mitigation measures for construction, access, noise, light/glare and dust contained in sections 5.1 (Construction), 5.1.1 (Access), 5.1.2 Noise, 5.1.3 (Light/Glare) 5.1.4 (Dust) respectively of the Normandeau memorandum.
- HSJ 2. The project proponent shall incorporate landscaping, vegetation restoration and preservation of large tree (> 6" dBH) measures into the final design.
- HSJ 3. The project proponent shall compensate owners, as required by the Uniform Relocation Assistance and real Property Acquisition Policies Act of 1970 (as amended) and provided for in mitigation measure 5.2 of the Normandeau report.
- HSJ 4. Social considerations shall be mitigated consistent with Section 6.1 of the Normandeau memorandum and shall include implementation of a public information program, approved by the City regarding construction related activities and a Pioneer Street corridor safety analysis and mitigation plan for operation of the RROP, also subject to City review and approval.
- HSJ 5. The project proponent shall develop and implement, subject to City review and approval, the mitigation measures described in Section 6.2 of the Normandeau memorandum pertaining to economic considerations and effects of the RROP on local economic and property values both during construction and the operation of the RROP.

Visual Quality

Normandeau Associates, Inc. prepared a Visual Quality Technical Memorandum, dated November 20, 2007. The report provides a visual impact assessment consistent with FHWA guidelines. And the WSDOT Environmental Procedures Manual and Roadside Classification Plan. The purpose is to assess the visual landscape in the project area and to evaluate potential project related impacts to visual quality. Construction related impacts to visual quality will be temporary. The report concludes that the RROP, when completed, will result in permanent changes to the visual environment for Pioneer Street users and neighbors. The report concludes that the structure and roadway will not obscure any 'vivid' views of the 'larger landscape'. Secondary impact to visual quality may result from increase traffic in the downtown.

- VQ 1. During construction the project proponent shall implement the construction mitigation measures contained in Section 5.1 of the Normandeau memorandum pertaining to preservation of vegetation and minimizing clearing, use of hooded lights, and compliance with the WSDOT Standards Specifications for Road, Bridge, and Municipal Construction.
- VQ 2. During final design and construction the project proponent shall incorporate the operation and maintenance measures described in Section 5.2 of the Normandeau memorandum including, but not limited to: preservation and conservation of native plants and wildflowers, incorporating landscape components, vegetation restoration and large tree (6" dBH) preservation measures into

the final design, and design the RROP and approach walls using colors and textures which the city determines to be harmonious with the urban and natural setting in which they are placed.