

**Leudinghaus Road Bridge Replacement Project
Environmental Assessment (EA) Revision Sheet**

**U.S. Department of Homeland Security
Federal Emergency Management Agency, Region X**

January 2014

FEMA-1734-DR-WA (Public Assistance)

Summary

The U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) released the Draft Environmental Assessment (EA) for the Leudinghaus Road Bridge Replacement Project on December 9, 2013 for public comment. Copies of the Public Notice, with instructions on how to access the Draft EA, were sent directly to those agencies, Tribes, and stakeholders that participated in scoping, as well as others with a potential interest in the project. The Public Notice announcing the availability of the EA to the general public for comment was published in two local newspapers (*the East County Journal* and *the Chronicle*), and the Draft EA was available for viewing at the Vernetta Smith Chehalis Timberland Library and the Lewis County Clerk's office. The Public Notice and Draft EA were posted to both the FEMA and Lewis County websites. FEMA received comments from seven individuals and has responded to these comments in this Revision Sheet.

Based on the comments received on the Draft EA, no specific text changes need to be incorporated into the EA analysis. FEMA has prepared this Revision Sheet to present the comments received on the Draft EA and respond to those comments. Combined, this Revision Sheet and the Draft EA constitute the Final EA, which will not be reprinted.

Public Comments and FEMA's Responses

This section presents comments received on the Draft EA and FEMA's responses to those comments. Comments were received via letter and email. The official public comment period was from December 9, 2013 to January 17, 2014.

FEMA received comments from a total of seven sources. Table 1 lists the comments received, and is followed by summaries of each comment and FEMA's response. For privacy issues, the names, addresses, email addresses, and phone numbers of comments received from the general public are not listed or shown in the comment summaries. However, the majority of the comments are reproduced in full for the project record.

Table 1. Public Comments on the Draft EA

Comment Number	Commentor Type	Commentor Source and Name	Comment Format (Date)
1	Agency	Washington State Department of Ecology, Sonia Mendoza and Deborah Cornett	Letter (January 15, 2014)
2	Agency	Washington State Department of Archaeology and Historic Preservation, Matthew Sterner	Letter (December 31, 2013)
3	Agency	FEMA, Office of Chief Counsel, Federal Insurance and Mitigation Law Division, Deborah Greenside	Email (January 17, 2014)
4	Tribe	Nisqually Indian Tribe, Jackie Wall	Letter (December 3, 2013)
5	General Public	General Public (Project Neighbor)	Email (December 8, 2013)
6	General Public	General Public (Project Neighbor)	Email (January 3, 2014)
7	General Public	General Public (Project Neighbor)	Email (January 10, 2014)

Comment 1, Washington State Department of Ecology

Thank you for the opportunity to comment on the draft environmental assessment for the Leudinghaus Road Bridge Replacement project. The Department of Ecology (Ecology) reviewed the information provided and has the following comment(s):

SEPA REVIEWER: Sonia Mendoza; WATER QUALITY CONTACT: Deborah Cornett (360) 407-7269

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 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action. Proper disposal of construction debris must be on land in such a manner that debris cannot enter water of the state and stormdrains draining to waters of the state or cause water quality degradation of state waters. Ecology’s comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action. If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology, Southwest Regional Office

FEMA’s Response to Comment 1:

The EA addresses erosion and sediment control, the control of potential pollutants, and the disposal of construction debris associated with demolition and construction activities in Section 3.3, *Alternative 1 (Proposed Action)*; in Section 3.3.1 (under *Staging and Demolition, Bridge Construction, and Stormwater Facility Construction*); and in Section 3.3.2, *Impact Avoidance and Minimization Measures*. These issues are also addressed for specific resources in Chapter 4, *Affected Environment and Potential Impacts*, in Section 4.1, *Physical Resources*, Section 4.2, *Water Resources*, and Section 4.3, *Biological Resources*. Additionally, as described in Chapter 6, *Permitting, Project Conditions, and Mitigation Measures*, of the EA, Lewis County is required to obtain and comply with all required local, state and federal permits, approvals, and requirements. Failure to obtain all appropriate permits and approvals may jeopardize FEMA funding.

Comment 2, Washington State Department of Archaeology and Historic Preservation

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP) and providing an electronic link to the draft environmental assessment (EA) for this project. The EA 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. My review is based upon documentation contained in your communication.

I have no comment on the draft EA. The document accurately represents the successful completion of the Section 106 review for the project. Thank you for the opportunity to review and comment. Sincerely,
Matthew Sterner, M.A.

FEMA's Response to Comment 2:

Thank you for your comment and acknowledged receipt/review of the EA analysis. No further response is necessary.

Comment 3, Federal Emergency Management Agency (Legal)

From: Greenside, Deborah

I have reviewed the DEA, Appendices and FONSI for the Leudinghaus Road Bridge Replacement Project (FEMA-1734-DR-WA), and concur with your finding of no significant impact. This was a very comprehensive EA with detailed analyses! I had some minor comments as indicated by "yellow bubbles" on attachment. See pp. 4-17, 4-28, and 4-69-70:

Page 4-17: Should Appendix C, Important Farmland Analysis, be signed by the NRCS?

Page 4-28: Does "AECOM" get spelled out or is that the full name? You might want to say "the preparer," so one knows who AECOM is prior to end of document.

Page 4-69: Regarding potential noise impacts associated with Alternatives 1 and 2, would anything be done to limit noise? Perhaps as in only performing construction between 9 and 5 p.m.?

Page 4-70: In what way does the construction and operation of the Chandler Road Bridge project have the potential to contribute to cumulative impacts?

FEMA's Response to Comment 3:

FEMA's response to each of these comments/issues is presented below.

- **Important Farmland Analysis** – The signatory for the NRCS Farmland Conversion Impact Rating form contained in Appendix C is the Federal Lead Agency, in this case, FEMA. This form is included as an appendix in the EA for informational purposes relevant to the analysis of the alternatives in regard to potential impacts on important farmland. A signed copy of the form will be kept by FEMA as part of the Administrative Record for the project.
- **AECOM** – AECOM is a FEMA contractor/consultant who assisted with the preparation of the EA. Individuals with AECOM who worked on the EA are listed in Chapter 8.0, *List of Preparers*, page 8-1. These individuals work in AECOM's Seattle office. AECOM is the full name of the company and is not an acronym.
- **Noise Impacts** –As noted in the Draft EA Section 4.5.4, *Noise*, page 4-60, construction would comply with Lewis County noise regulations. Lewis County Code 17.145.050 specifies that no

development shall exceed the maximum environmental noise levels established by Chapter 173-60 (Maximum Environmental Noise Levels) of the Washington Administrative Code (WAC). Noise from temporary construction sites is exempt from the provisions of WAC Chapter 173-60, except where it relates to noise impacts between the hours of 10:00 p.m. and 7:00 a.m.

- **Cumulative Impacts** – Potential cumulative impacts from the construction and operation of the Chandler Road Bridge rebuilt approximately 3.5 miles upstream of the proposed Leudinghaus Road Bridge and re-opened in December are described in detail in the *Final Environmental Assessment for the Chandler Road (Dryad) Bridge Replacement Project* (FEMA 2010), which is incorporated here by reference.

Comment 4, Nisqually Indian Tribe

RE: Section 106 Consultation FEMA 1734 DR WA Public Assistance Grant Program Dryad (Leudinghaus) Bridge Replacement, Lewis County

I have received the Archaeological monitoring plan and the Inadvertent Discovery Plan for the above named project. I am pleased that these protections have been put into place. The Nisqually Indian Tribe wishes to be contacted in the event there are findings. Thank you, Jackie Wall, THPO

FEMA's Response to Comment 4:

Thank you for your comment and acknowledged receipt/review of the monitoring plan. As described in the Draft EA (page 4-53), "In the event that cultural resources are identified during project-related activities, work would be halted in the immediate vicinity of the find, a professional archaeologist would evaluate the significance of the resource, and protocols established in the unanticipated discovery plan would be followed." No revisions to the EA analysis are necessary.

Comment 5, General Public (Project Neighbor)

Living on Leudinghaus Rd., and using the Chandler Bridge has been an inconvenience and my husband and I have always been in favor of the replacement of the, what we call the Meskill bridge. Now we have an even bigger reason for the replacement of the bridge. Last week I suffered a heart attack on a very cold and icy night. It took the ambulance 45 minutes to make what should have been a 30 minute trip. Twenty minutes of that time was having to take the Chandler Bridge route. For me that was a very long time! Add to that the trip to the ER, a very long time! Luckily for me, the EMT's in our local area are super people, as were the ambulance personnel. Do we believe our bridge is needed? Yes! Is one or more neighbor and friends going to be adversely effected, without a doubt, but the welfare of our community should come first. Would I happily give up my home, no...but I would also understand that my refusal to could very well mean the death of a friend, not a very good exchange, my home or a persons life. We sincerely hope that the bridge replacement is funded and will begin soon!

FEMA's Response to Comment 5:

Thank you for your comment and acknowledged receipt/review of the EA analysis and support for the Proposed Action. As noted in the EA, the original bridge provided a critical socioeconomic link for residents living in this rural community area, as well as faster access for residents, workers, emergency service providers, and others living, working, or serving the project area. Lewis County needs to re-establish this critical socioeconomic link, as well as a safe and secure ingress/egress route for the Meskill

area residents living in the Chehalis River floodplain. One of the key objectives of the project is to minimize the distance and time required for emergency service providers to travel between SR 6 and the Meskill area north of the Chehalis River (page 2-1). Based on the comment, no changes have been made to the EA analysis.

Comment 6, General Public (Project Neighbor)

Thank you for the opportunity to provide comment on the proposed bridge replacement. As residents who lives between the two proposed sites, we appreciate the consideration. We are very thankful to have this project moving forward after losing the previous bridge 6+ years ago. We are in full support of replacement. Of utmost importance is the improved response time in emergencies (medical, fire, police and disaster). We feel the proposed Alternative 1 is the best choice for the following reasons:

The involved property owners are in agreement compared to the other proposal

-Easier approach from Hwy 6 as compared to the old site (hairpin turn onto River Rd) and no blind spot with the curve

-Easier to identify turn off (from Hwy 6 versus from Hwy 6 and then from River Rd)

-Personally, less traffic for us (compared to when we had only the Bailey Bridge in place before the Chandler Bridge replacement)

Thank you for your time and consideration.

FEMA's Response to Comment 6:

Thank you for your comment and acknowledged receipt/review of the EA analysis and support for the Proposed Action. Please see FEMA's Response to Comment 5 regarding emergency service vehicle response time and access.

Comment 7, General Public (Project Neighbor)

I live at ... Hatchery Road in Lewis County, across the Chehalis River from Leudinghaus Road, where the bridge replacement is going to take place. There are only a small handful of us living on farms along Hatchery Road, but our bridge over Hope Creek is profoundly undersized and outdated. It was my understanding that updating Hatchery Road's Hope Creek bridge was going to be a part of this project. From what I have read in the documents on the FEMA website, this no longer seems to be the case. I am gravely concerned about how the Leudinghaus project will change the hydrology of my location. Adding so much fill material, clearing stabilizing trees from the banks and changing the downstream flow of the river to create the new bridge could have dire consequences for those of us with no route of escape other than the little bridge over Hope Creek. An access road was installed on Hatchery Road in preparation for this project; is our road to be used and impacted in the building of the Leudinghaus Bridge and then left with no improvements for safety? I do hope that there will be further consideration regarding the impacts the Leudinghaus Bridge project will have on those of us living on Hatchery Road. I look forward to hearing from you...

FEMA's Response to Comment 7:

As described in Section 3.1, *Alternatives Considered but not Carried Forward*, and in Section 5.1, *Public Involvement*, a set of seven preliminary alternatives (Preliminary Alternatives A-G) for this project were developed by Lewis County in 2010. The conceptual sketch for Preliminary Alternative E that was

presented by Lewis County at the August 24, 2010 public meeting (and is on file with the County) depicted a bridge over the Chehalis River from Hatchery Road to Leudinghaus Road that would have involved reconfiguring the Hatchery Road intersection with SR 6 and installing a culvert on Hope Creek. However, updating the Hatchery Road bridge over Hope Creek has never been one of the goals or objectives of this FEMA-funded project. Due to the potentially substantial impacts on Hope Creek associated with Preliminary Alternative E, the concept was refined by Lewis County, and the bridge and approach roads shifted east to avoid the creek. The new bridge location east of Hope Creek became the Preferred Alternative evaluated in this EA. Effects on hydrology and flooding at and upstream of the proposed bridge site are described in detail in Section 4.2, *Water Resources*. As described, the proposed bridge would be a clear span bridge across the Chehalis River, and the Hydrologic and Hydraulic Evaluation conducted for the proposed bridge indicates that there would be a 0.3-foot drop in the maximum water surface elevation at the proposed bridge site during a 100-year flood event. This is a result of both the removal of the old Leudinghaus Bridge and the much higher capacity to handle flood flows.