# SEPA ENVIRONMENTAL CHECKLIST

# A. Background

1. Name of proposed project, if applicable:

Investigation and Remediation of Releases from Oily Water Sewer (OWS)

2. Name of applicant:

Shell Puget Sound Refinery (PSR)

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

Applicant/Contact: Gary Barklind Shell Puget Sound Refinery 8505 South Texas Road Anacortes, WA 98221 (360) 299-0180

4. Date checklist prepared.

February 2021

5. Agency requesting checklist:

Washington State Department of Ecology (Ecology)

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

The proposed project will start with the reissuance of the Dangerous Waste Management Permit in 2021. The permit references an Agreed Order that directs the investigation and remediation of releases from the refinery's oily water sewer. The term of the permit is 10 years.

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

There are no plans for future expansion of the oily water sewer related to this proposal.

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

A Potentially Liable Person determination was documented in a letter from Ecology to Shell PSR dated September 27, 2018. The PLP letter provides environmental information that serves as the basis for Ecology's issuance of the proposed Agreed Order.

The proposed Agreed Order requires Shell PSR to submit an Investigation and Response Plan for Ecology's review and approval within 6 months of permit issuance. If a release is discovered during the investigation of the oily water sewer, Shell PSR is

required to submit a work plan that describes the extent of soil and groundwater contamination related to the release and the remedial action that will be implemented to address the contamination. Shell PSR is also required to submit annual progress reports that summarize the findings of the oily water sewer investigation and any remedial actions taken to address releases.

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

No

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

Government approvals or permits that will be needed for the proposed project are the Agreed Order for Interim Action – Oily Water Sewer from the Washington State Department of Ecology. Other approvals and permits could also include a Grading Permit from Skagit County; an NPDES Construction Stormwater General Permit from Ecology; Critical Areas Review from Skagit County; Clean Water Act (CWA) Section 401 Water Quality Certification from Ecology; Hydraulic Project Approval (HPA) from Washington Department of Fish and Wildlife; Clean Water Act (CWA) Section 404 Nationwide and/or Individual Wetland Permit from U.S. Army Corps of Engineers.

11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Ecology and Shell PSR are entering into a proposed agreed order to implement a project to investigate and address any releases that may have occurred from the refinery's oily water sewer (OWS). The order requires that Shell PSR prepare a plan to evaluate the integrity of the OWS, identify any releases, fix the cause of the releases, and take interim remedial actions to clean up any soil or groundwater contamination that may have resulted from the releases.

The order only addresses releases from the OWS. The order specifies a number of presumptive interim actions that may be used to clean up the releases (Order Exhibits C and D), if any are found. There is no evidence of a current release from the OWS. The answers provided in this checklist are for a hypothetical release discovered as part of this project, which is addressed using the presumptive actions in the order. The answers are intended to provide information so that the lead agency (Ecology) can evaluate the potential environmental impacts and make a threshold determination under SEPA.

The OWS serves the process areas of the refinery. As such, any presumptive interim actions taken under this order are anticipated to be generally within the footprint of the current operations and product storage/handling areas of the refinery. In general, these are areas of intensive industrial land use.

Periods of active remediation required under the Order are anticipated to be infrequent and will only occur if a release from the OWS requiring action has been confirmed. If active remediation is necessary, it is anticipated to be of relatively short duration, typically from several days to a month.

If OWS integrity testing identifies a potential release, a program of investigation will be completed to confirm the release and define the nature and extent of contamination resulting from the release. Based on this information, a presumptive interim action will be selected by Shell PSR. In most cases, the presumptive interim action will involve excavation and treatment or off-site disposal of soils. If groundwater is impacted, then ongoing treatment and/or monitoring may be necessary.

If this project identifies releases where remedial actions beyond the presumptive interim

actions described in the Order are necessary, then a more detailed work plan for the proposed actions will be developed for Ecology's review and a new SEPA checklist will be completed.

## Location of the proposal.

The Facility is located on the southern portion March Point two miles east of Anacortes, Washington in Skagit County and consists of approximately 550 acres, is bounded on the north by North Texas Road, on the south by South Texas Road, on the west by the Fidalgo Bay, and on the east by Padilla Bay. The site address is 8505 South Texas Road, Anacortes, WA, 98248. A diagram of the Facility and the major oily water sewer trunk lines are included in Agreed Order Exhibit A and Exhibit B and are attached to this SEPA.

# **B.** Environmental Elements

### 1. EARTH

a. General description of the site:

(underlined and bold): Flat, rolling, hilly, steep slopes, mountainous, other

The general topography of the March Point peninsula is characterized by a north-south oriented ridge through the central portion of the site. The highest point of the site is located along the northern property boundary near the northwest corner of the fire water ponds. From this location, the ground surface slopes downward to the east at a gradient of about 200 feet per mile and downward to the west at about 440 feet per mile. The ground surface also slopes downward to the south at a gradient of about 100 feet per mile.

b. What is the steepest slope on the site (approximate percent slope)?

The original topography of the site has been modified since site development began in 1957. As a result of site grading, topographical benches have replaced the original smooth slopes and containment berms have been developed with slopes of up to 1.5:1.

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 agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The general type of soils found on the site include a discontinuous layer of artificial fill underlain by glacial deposits (including clayey silt, silty clay, clay, and clay-rich diamicton), underlain by fine to coarse sand with minor gravel.

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

There are no indications or history of unstable soil in the immediate vicinity of the site.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

The proposed project may result in the excavation and removal of soils contaminated with hazardous substances. Soils that are excavated will be designated and hauled to an off-site landfill permitted to accept the material or treated on-site. The excavated area will be back-filled with clean soils and then graded.

Since a specific release from the OWS has not been identified, it is not possible to estimate a specific volume of soil that may need to be removed and transported for treatment or disposal. However, for the purposes of this environmental review, it is anticipated that releases addressed using one of the presumptive interim actions in the Order will be less than 1000 cubic yards.

If a release from the OWS is discovered, a work plan will be submitted to Ecology that provides details of the extent of contamination and the proposed remedial action. These details will include the volume of affected soil and any filling, excavation, or grading proposed. The work plan will also identify the source of clean fill and where the excavated soils will be taken.

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

It is possible that soil erosion could occur during site disturbance activities and seasonal precipitation events.

g. About what percent of the site will be covered with impervious surfaces after project construction?

It is not expected that any portion of the site will be covered with impervious surfaces as a result of the proposed project.

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

Best Management Practices (BMPs) from Ecology's Stormwater Management Manual for Western Washington will be employed to reduce pollutant loss to stormwater. These BMPs may include erosion control fencing, placing plastic sheeting on stockpiled soils, and revegetating any exposed soils within 30 days.

# 2. AIR

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

During any soil excavation, removal, or grading activities, combustion emissions and dust will be temporarily emitted from earth moving equipment such as tractors, backhoes, and dump trucks and well drilling equipment. Emissions associated with site disturbance activities and well drilling will be infrequent and short-term. These activities are not expected to result in air quality impacts. No additional air emissions are expected as a result of completing the Order requirements.

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

There are no off-site sources of emissions or odor that are expected to affect the proposed project.

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

The following measures may be employed during site disturbance activities to reduce or control air emissions: wet exposed soils, cover stockpiled soils, and using vacuum street sweepers. All equipment will utilize standard manufacturer installed emissions control systems.

# 3. WATER

- a. Surface Water:
- 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.

Artificial water bodies on the site include collection ponds for the facility wastewater treatment plant located on the southwestern portion of the site, and the fire water ponds located at north end of the site.

Multiple wetlands are located on Shell PSR property outside of the of industrial areas. This includes wetlands in the northwest corner (west of "A" Street and north of 6<sup>th</sup> Street), as well as scattered wetlands in the undeveloped areas east and south of the refinery processing areas. The OWS does not cross any wetlands.

Fidalgo Bay is located west of the site. The nearest OWS trunk is approximately 600 feet away from Fidalgo Bay. Padilla Bay is located east of the site. The nearest OWS trunk is approximately 2,300 feet away from Padilla Bay.

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.

The proposed project is not expected to require any work over, in, or adjacent to the described 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 proposed project will not require fill or dredge activities in waters of the state.

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

The proposed project will not require surface water withdrawals or diversions.

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

The proposed project is not within a 100-year flood plain.

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 proposed project is not expected to result in the discharge of any waste materials to surface waters.

- b Ground Water
- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

If a release from the oily water sewer is discovered a work plan will be submitted to Ecology that provides details of the proposed remedial action which may include groundwater monitoring wells. A minor amount of water (typically < 1 gallon) would be withdrawn with each sample. Wells may be sampled on a recurring basis. Groundwater may also be withdrawn for treatment as part of a remedial action.

The proposed project is not expected to result in discharge to groundwater.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . .; agricultural; etc.). 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.

The proposed project will not involve discharges of waste material into ground water.

- 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.

The proposed project is not expected to increase the quantity of stormwater draining from the refinery site. Water runoff is managed in accordance with the Shell PSR National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit No. WA0002941. Water runoff from the majority of the site is directed to the Effluent Plant for treatment prior to being discharged to Fidalgo Bay. Clean stormwater runoff

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from remaining areas is directed to controlled stormwater outfalls which discharge to Fidalgo Bay and to Padilla Bay. Water discharged from the site is sampled and monitored per the NPDES permit.

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

The proposed project will be designed to capture and/or control all potential waste materials or spills to prevent such material from reaching ground or surface water.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

The proposed project is not expected to permanently alter or otherwise affect drainage patterns in the vicinity of the site.

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Should site disturbance activities occur during seasonal precipitation events, Best Management Practices from the Ecology's Stormwater Management Manual for Western Washington will be employed to reduce pollutant loss to stormwater.

#### 4. PLANTS

a.	Check the	types	of	vegetation	found	on	the	site:
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X	_deciduous tree: alder, maple, aspen, other
Χ	_evergreen tree: fir, cedar, pine, other
	_shrubs
X	_grass
	_pasture
	_crop or grain
	<u>o</u> rchards, vineyards or other permanent crops
	_wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
	_water plants: water lily, eelgrass, milfoil, other
	_other types of vegetation

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

The proposed project is not expected to remove or alter vegetation.

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

No special-status plant species are known to occur on or near the site.

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

Vegetation may be established for erosion control purposes in disturbed areas. The project is within an industrial refinery and no additional landscaping is planned.

e. List all noxious weeds and invasive species known to be on or near the site.

The site contains small amounts of the following noxious weeds: bull thistle (Cirsium vulgare), Canada thistle (Cirsium arvense), and poison hemlock (Conium maculatum).

### 5. ANIMALS

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

birds: hawk, heron, eagle, songbirds,

mammals: deer:

fish: salmon, trout, herring, shellfish (in Fidalgo Bay and Padilla Bay)

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

No threatened or endangered (T&E) species are located on the site. Habitat for T&E species does not occur on the site. The nearest special-status wildlife species location is an eagle nest, located west of the intersection of "A" Street and 9th Street. The nearest OWS trunk is approximately 2,400 feet away from the nest.

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

The Shell PSR site is located within the Pacific Flyway, which is a flight corridor for waterfowl and other avian fauna migration. The Pacific Flyway extends from Alaska south to Mexico and South America. The project will not affect use of the Pacific Flyway by migratory birds.

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

The proposed project does not include any measures to preserve or enhance wildlife.

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

No invasive animal species are known on the site, but European starlings (Sturnus vulgaris) are likely in the area.

### 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.

There will be no incremental, long-term energy demands from the proposed project. There will be short-term incremental demands for gasoline, diesel, and electricity. Electricity will be provided by the refinery's existing electrical power system. Gasoline and diesel will be used to power earth moving equipment and electricity will be used to

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power area lighting.

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

The proposed project will not affect the potential use of solar energy by adjacent properties.

c. 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 measures and procedures currently utilized at the refinery will be applied to all activities required by the proposed project.

### 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.

If an oily water sewer release has occurred, workers may be exposed to contaminated soil and/or groundwater. Soil and groundwater that have been impacted will be sampled to determine contaminant levels. Shell PSR utilizes extensive worker protection protocols including activity-specific hazard evaluations and requiring workers to wear the appropriate level of personal protective equipment (PPE) based upon the hazards identified for each activity. These hazards and mitigation strategies will be identified and managed through the job safety analysis developed specifically for the work to be performed. Contaminated soil and groundwater will be managed in accordance with appropriate health and safety standards.

1) Describe any known or possible contamination at the site from present or past uses.

A PLP letter from the Ecology dated September 27, 2018 provides information about the known contamination at the site from present or past uses. Based on site history and previous cleanup actions, releases or threatened releases of hazardous substances from the oily water sewer may include Total Petroleum Hydrocarbons - gasoline and diesel range (TPH-G and TPH-D); Benzene, Toluene, Ethylbenzene, and Xylene (BTEX); polycyclic aromatic hydrocarbons (PAHs), and metals.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

The proposed project will require the main trunk lines in the underground piping system of the oily water sewer to be inspected. Inspection procedures will be established in the Investigation and Response Plan which shall be submitted within six (6) months of the effective date of the proposed Agreed Order. Inspection and response procedures used will be affected by the nature of the liquids in the sewer (corrosive, toxic, and/or flammable), the continuous operation of the refinery and flow in the oily water sewer, the depth to the oily water sewer, the risk to personnel from sewer gases, the air emission control systems which are installed on the sewer, and refinery infrastructure which overlies the buried oily water sewer. There are aboveground pipelines containing

hydrocarbon material near the proposed project whose locations are well documented and controlled.

3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

The proposed project is not expected to produce, store, or use hazardous chemicals.

4) Describe special emergency services that might be required.

No special or new emergency services will be required. Trained refinery personnel can respond to emergencies onsite. Shell PSR will coordinate with local emergency responders as needed during the project.

5) Proposed measures to reduce or control environmental health hazards, if any:

The proposed project will require development and implementation of a health and safety plan to ensure worker protection.

### b. Noise

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

The proposed project is located within an active industrial area. Existing noise sources (vehicular, air, rail, and water traffic and surrounding operations) will not affect the project.

2) 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.

The proposed project may slightly increase ambient noise as employees and contractors operate vehicles and other equipment. This will be a short-term and intermittent impact. Vehicle and equipment operation will only occur between the hours of 8:00 am to 10:00 pm. The proposed project is within the active petroleum refinery.

3) Proposed measures to reduce or control noise impacts, if any:

Noise mitigation measures including, but not limited to, the following may be implemented as applicable:

- Compliance with applicable local and state regulatory provisions related to noise
- Incorporation of industry best management practices into construction plans and contractor specifications
- Use of standard manufacturer's equipment (e.g., mufflers on engines, intake silencers, engine enclosures)
- Turning off construction equipment when not in use

#### 8. LAND AND SHORELINE USE

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The current use of the site is an active industrial oil refinery (Shell PSR). The project area is completely encompassed by the Shell PSR refinery. The proposed project is not expected to affect the land uses of neighboring properties.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

The project site has not been used for agriculture or commercial forestry.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

The proposed project will not affect or be affected by surrounding agricultural or forest land operations.

c. Describe any structures on the site.

The proposed project is located within an operating petroleum refinery. Typical structures associated with a refinery are present on the site.

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

It is not anticipated that the proposed project will require the demolition of any structures.

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

Skagit County classifies this site as A-UD Anacortes UGA Urban Development District. The City of Anacortes classifies the site as HM Heavy Manufacturing

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

The PSR site is within Skagit County but within the Anacortes Urban Growth Area (UGA). Skagit County designates this site as A-UD Anacortes UGA Urban Development District. The City of Anacortes designates this site as HM Heavy Manufacturing.

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

Per the 2013 DRAFT Skagit County Shoreline Master Program some portions of the Shell PSR wastewater treatment plant are located on or near areas designated "high intensity" shoreline, and scattered wetlands in the undeveloped areas east and south of the refinery processing areas are located on or near areas designated "urban conservancy" wetlands. The OWS does not cross either of these areas.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify,

Wetlands are classified as critical areas by Skagit County. Wetlands on or near the site are discussed above in Section 3.a and Section 8.g. No other critical areas have been designated at the site.

i. Approximately how many people would reside or work on the completed project?

The proposed project will have no permanent effect on facility employment or area population.

j. Approximately how many people would the completed project displace?

None.

k. Proposed measures to avoid or reduce displacement impacts, if any:

Not applicable.

I. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The proposed project will have no impact on the existing land use as heavy manufacturing. The project is located within a petroleum refinery.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any

The proposed project will not impact agricultural and forest lands.

# 9. HOUSING

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

No housing units will be provided as part of the proposed project.

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

No housing units will be eliminated as part of the proposed project.

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

The proposed project will not impact local housing.

# 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?

No structures are proposed as part of the project.

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

No views will be obstructed as part of the proposed project.

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

The proposed project will not impact aesthetics.

# 11. LIGHT AND GLARE

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

The proposed project is not expected to produce light or glare.

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

The proposed project is not expected to produce light or glare.

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

There are no off-site sources of light or glare that are expected to affect the proposed project.

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

The proposed project is not expected to result in light or glare impacts.

## 12. RECREATION

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

There are no designated recreation areas in the immediate vicinity of the Shell PSR. The nearest recreation opportunity is informal biking recreation along March Point Road or informal boating recreation in Fidalgo Bay and Padilla Bay.

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

The proposed project will not affect recreational uses.

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

The proposed project will not impact recreational uses.

# 13. HISTORIC AND CULTURAL PRESERVATION

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

Segments of the oily water sewer will be evaluated for historically significant buildings,

structures, or sites if soil disturbing activities are required.

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

Segments of the oily water sewer will be evaluated for landmarks, features, or other evidence of Indian or historic use or occupation if soil disturbing activities are required.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Methods that will be used to assess the potential impacts to cultural and historic resources on or near the project site may include some or all of the following: consultation with tribes, literature review and records search of the Department of Archaeology and Historic Preservation's (DAHP) Washington Information System for Architectural and Archaeological Records Data (WISAARD), historic maps review, GIS data, and visual observations.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Pending a cultural resources assessment, plans to avoid identified resources will be prepared for the proposed project as needed.

# 14. TRANSPORTATION

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

The site is accessed from State Route (SR) 20 via Thompson Road, which becomes Bartholomew Road heading north. Private roads internal to the Shell PSR will provide direct access to the project site.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The site is not served by public transit. The site is within the fenced refinery and not accessible by the general public. The nearest transit stop is the Skagit Transit-operated March Point Park-and-Ride, which is approximately 1 mile from the project site.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

The proposed project will not require additional parking spaces or eliminate parking spaces.

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

The proposed project will not require any new roads or streets or improvements to the local transportation system.

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

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

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The proposed project will likely require <25 additional vehicle trips/day by employees and contractors to access the site. This will be a temporary impact.

g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

The proposed project will not affect movement of agriculture or forest products on roads or streets in the area.

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

The proposed project is not expected to impact transportation in the area.

## 15. Public Services

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

The proposed project is not expected to result in an increased need for public services.

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

The proposed project is not expected to impact public services.

# 16. <u>UTILITIES</u>

a. Utilities currently available at the site include:

Electricity, natural gas, water, steam, refuse service, telephone, wastewater treatment.

**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.

No new utilities are proposed for the project. The proposed project may use any combination of the above listed utilities, which will be provided by the refinery's existing infrastructure.

# 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:

Position and Agency/Organization Solid Waste Engr, Shell Puget Sound Refinery.

Data Submitted: 03/12/21

Date Submitted:

Name of signee \_\_\_