STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • PO Box 330316 • Shoreline, Washington 98133-9716 • (206) 594-0000
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STATE ENVIRONMENTAL POLICY ACT
Determination of NonSignificance

Date of Issuance: July 6, 2021

SEPA Lead Agency: Department of Ecology, Northwest Regional Office, Toxics Cleanup Program

Agency Contact: John Guenther, (360) 255-4381, jgue461@ecy.wa.gov

Description of Proposal:

The Proposed action is to conduct the cleanup of the GP West, Chlor-Alkali Remedial Action Unit, MTCA cleanup site located at 300 West Laurel Street in Bellingham, Washington. The property is currently owned by the Port of Bellingham. The contamination is from a Chlor-Alkali Plant that operated on the property between 1965 and 1999 and other historic industrial activity. The contamination has impacted upland soils, groundwater and sediment. The sediment contamination is being addressed separately as part of the Whatcom Waterway cleanup site.

The proposed cleanup action includes several remediation components that are anticipated to be assembled into four projects for contracting and construction given the varying technical requirements for each component. The anticipated remediation Projects are:

(A) Excavation and off-site disposal of mercury-contaminated soils from a former wastewater settling basin plus consolidation and capping of mercury-contaminated soils within a stormwater swale.

(B) Neutralizing high-pH groundwater south of the former chlorine plant area by placing selected treatment media in a series of trenches excavated below the water table.

(C) Within the former chlorine plant area, excavation and off-site disposal of petroleum-contaminated soils followed by removing/landfilling subsurface structural obstructions and then conducting *in situ* stabilization/solidification (ISS) of underlying mercury-contaminated soils by thoroughly mixing selected treatment media into the soils above and below the water table.

(D) Following completion of the first three projects, cap the ground surface in areas with residual contaminated soils using pavement or other means acceptable to Ecology.

There is no construction of additional structures, utilities, or infrastructure associated with this action. Future development activity may be subject to additional environmental review under the SEPA as required.

Location of Proposal:

The approximately 36-acre property is located at 300 Laurel Street in Bellingham, WA, on the south side of the Whatcom Waterway (Figure 1). The property is situated within portions of Sections 25 and 36, Township 38N, Range 02E and Section 30, Township 38N, Range 03E of the Willamette Meridian

Proponent Contact:

Brian Gouran, Port of Bellingham, 1801 Roeder Avenue, Bellingham, WA 98225, (360) 676-2500

The Department of Ecology has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c).

This determination is based on a review of a completed SEPA environmental checklist and other information on file with the lead agency. This information is available to the public upon request or on the cleanup site web page: https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=193

This DNS is issued under WAC 197-11-340(2) and the comment period will end on August 4, 2021.

SEPA Responsible Official:

Robert W. Warren
Section Manager
Northwest Regional Office
Toxics Cleanup Program
(425) 649-7054

Signature  Date June 15, 2021

There is no appeal process for this determination.

STATE ENVIRONMENTAL POLICY ACT (SEPA)
ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of proposed Project: Final Cleanup of Chlor-Alkali Remedial Action Unit, GP West Site

2. Name of applicant: Port of Bellingham Telephone: (360) 676-2500

   Name of Contact: Brian D. Gouran Telephone: Same as above.

3. Address: P.O. Box 1677
   Bellingham, WA
   98227-1677

4. Date checklist prepared: May 28, 2021

5. Agency requesting checklist: Department of Ecology

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

   Construction of the Project is anticipated to occur between 2023 and 2026. Project design is anticipated to start in late 2021.

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

   Future development within the site boundary may result in additional contaminated material removal and permitted disposal. These future development actions will be subject to additional regulatory reviews and permitting and may require Ecology approval.

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

   - Public Review Draft Cleanup Action Plan, prepared by Washington State Department of Ecology, May 27, 2021;
   - Final Feasibility Study, Chlor-Alkali Remedial Action Unit, prepared by Aspect Consulting, June 2018;
   - Final Remedial Investigation, GP West Site, prepared by Aspect Consulting, August 5, 2013;
   - Final Environmental Impact Statement - The Waterfront District Redevelopment Project (Formerly Known as New Whatcom), dated December 2012 (including all supplemental and addenda).

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 governmental approvals or permits that will be needed for your proposal, if known. Include Federal, State, City, County, and local districts or regional offices.

    The proposed action will be conducted under Agreed Order No. 6834 (as amended) between the Port of Bellingham and the Washington State Department of Ecology within the authority of the state Model Toxics Control Act (MTCA). The proposed action is exempt from the procedural requirements of state and local permits that would otherwise be required, per RCW 70A.105D.090. However, the proposed action is required to demonstrate substantive compliance with applicable state and local permits. These include: City of Bellingham clearing, grading, stormwater, and Shoreline Substantial Development permits.

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. (You may attach a page if this space is not adequate.)

    The Project site, located at 300 West Laurel Street in Bellingham, Washington, on the south side of the Whatcom Waterway (Figure 1). A Chlor-Alkali Plant, producing chlorine gas and sodium hydroxide (caustic) using a mercury cell technology, operated between 1965 and 1999. Contamination from historical industrial activities has impacted Site upland soils and groundwater with a variety of contaminants that are required to be addressed through MTCA.

    The proposed cleanup action includes several remediation components that are anticipated to be assembled into four projects for contracting and construction given the varying technical requirements for the various components. The anticipated remediation Projects are:

    (A) Excavation and off-site disposal of mercury-contaminated soils from a former wastewater settling basin plus consolidation and capping of mercury-contaminated soils within a stormwater swale.

    (B) Neutralizing high-pH groundwater south of the former chlorine plant area by placing selected treatment media in a series of trenches excavated below the water table.

    (C) Within the former chlorine plant area, excavation and off-site disposal of petroleum-contaminated soils followed by removing/landfilling subsurface structural obstructions and then conducting *in situ* stabilization/solidification (ISS) of underlying mercury-contaminated soils by thoroughly mixing selected treatment media into the soils above and below the water table.

(D) Following completion of the first three projects, cap the ground surface in areas with residual contaminated soils using pavement or other means acceptable to Ecology.

There is no construction of additional structures, utilities, or infrastructure associated with the Project.

12. Location of the Proposal:

The approximately 36-acre Chlor-Alkali Remedial Action Unit property is located within the City of Bellingham with a street address of 300 Laurel on the south side of the Whatcom Waterway (Figure 1). The property is situated within portions of Sections 25 and 36, Township 38N, Range 02E and Section 30, Township 38N, Range 03E of the Willamette Meridian.

B. ENVIRONMENTAL ELEMENTS

1. EARTH

a. General description of the site:

- ☒ Flat
- ☐ Rolling
- ☐ Hilly
- ☐ Steep Slopes
- ☐ Mountainous
- ☐ 0ther

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

<5%

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

The surface of the Project area consists primarily of pavement and gravel. Site soil generally consists of approximately 10-20 feet of silty sand and sandy silt mixed with miscellaneous debris. The fill material is underlain by 10-40 feet of native beach and inner-tidal deposits that consist of medium sand.

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

No.

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

The Project will include the excavation and off-site disposal of approximately 7,400 cubic yards of contaminated soil and debris (including material removed during construction of

in situ neutralization trenches), excavation and on-site consolidation of approximately 700 cubic yards of contaminated soil, and ISS of approximately 13,000 cubic yards of contaminated soil. Following removal of these materials, up to 7.4 acres of the property (including areas excavated and not) will be graded as needed and capped with pavement.

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

Due to the flat topography of the site and the stormwater management components associated with the Project design, erosion is not expected to result from the completed Project. Appropriate best management practices (BMPs) will be implemented to address the potential for erosion during construction activities.

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

The current site conditions consist of approximately 97% impervious surfaces. At the conclusion of the Project, all of the Project area will be impervious surface to meet Cleanup Action Plan requirements.

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

Contractors will be required to implement BMPs for erosion control during construction consistent with the Washington State Department of Ecology Stormwater Management Manual for Western Washington. These may include covering stockpiles, use of fabric filter fencing, straw bales, wattles, interceptor swales, and/or similar measures.

2. **AIR**

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

No long term emissions are associated with the project.

Short-term emissions to the air would result from diesel and gasoline automobile/equipment exhaust during construction. A minor amount of dust may be generated from soil handling activities depending on the seasonal conditions. However, the majority the excavations will occur at depth below the existing groundwater table which will reduce dust generation. The contractor will be prepared to implement dust suppression BMPs including, but not limited to covering and/or wetting any soil if necessary.

The excavation and removal of subsurface obstructions within the area of elemental mercury being treated by ISS may result in the temporary emission of volatile mercury in the immediate vicinity of the excavation. The emission of volatile mercury would be temporary and would be limited to the immediate vicinity of the ISS area.

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

No.

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

Standard construction equipment will be utilized. During site preparation, demolition and construction, contractors will take reasonable precautions to minimize dust emissions. Temporary stockpiles staged at the site will be covered and secured. Contractors will be required to cover loads during transport.

The area of soil containing (volatile) elemental mercury to be treated by ISS is currently paved, and the pavement will be removed to execute the treatment work. To limit mercury vapor emissions to air during the process of removing subsurface obstructions and then conducting ISS in that area, the work will be conducted to limit the area of contaminated soil that is exposed to the atmosphere at any one time. This can include conducting the ISS-related earthwork within a temporary tent-like enclosure and using temporary impermeable covers over untreated exposed soil that is not being actively worked. It is anticipated that a large-capacity blower will draw air from within the enclosure through treatment canister(s) filled with sulfur-impregnated activated carbon designed to remove mercury vapors. The enclosure would provide containment and facilitate capture and treatment of mercury vapors generated during the obstruction removal and ISS treatment processes. Other methods may be employed during construction depending on final design and contractor means/methods.

Throughout the obstruction removal and ISS treatment processes, air monitoring for mercury will be conducted within the breathing zone for the purpose of worker health and safety, and around the Project site perimeter to assess fugitive emissions. Corrective measures to suppress vapors will be taken if the air monitoring indicates exceedances of defined action levels.

3. **WATER**

a. Surface:

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

The Project location is adjacent to Whatcom Waterway and Bellingham Bay.

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

Yes. Excavation of an estimated 4,700 cubic yards of contaminated soil, and capping (pavement) of a limited area of contaminated soils, will be completed within 200 feet of the Whatcom Waterway (see Figure 2).

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.

No material will be placed in or removed from surface water or wetlands.

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

No.

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

No.

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.

No.

b. Ground:

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

No water will be discharged to groundwater. Groundwater will be extracted to allow for excavation of contaminated soil from the wastewater settling basin area and potentially from the chlorine plant area. It is estimated that up to 250,000 gallons of groundwater could be dewatered to complete the excavations. Any groundwater extracted will be pretreated on site to remove settleable solids and then discharged to the Port of Bellingham's Aerated Stabilization Basin (ASB) under an NPDES Waste Discharge Permit. The ASB is currently sealed with no discharge to Bellingham Bay.

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 houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

N/A

c. Water Runoff (including storm water):

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.

Storm water will be treated on site through various BMPs during construction and until the site is stabilized. All storm water will be collected and managed through existing facilities and routed to the Port of Bellingham's ASB under an NPDES Waste Discharge

Permit. The ASB is currently sealed with no discharge to Bellingham Bay. No additional volume is anticipated or re-routed by this Project. No water will be discharged to surface waters of the state.

A Temporary Erosion and Sediment Control (TESC) plan will be developed and implemented throughout construction to minimize potential impacts associated with sediment and erosion. Temporary construction BMPs will include both source-control BMPs and treatment BMPs.

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

No.

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

Potential construction-related stormwater runoff associated with the proposed Project during construction will be addressed through implementation of a TESC plan and associated BMPs.

4. **PLANTS**

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

- ☐ Deciduous tree: alder, maple, aspen, other:
- ☐ Evergreen tree: fir, cedar, pine, other:
- ☐ Shrubs
- ☐ Grass
- ☐ Pasture
- ☐ Crop or grain
- ☐ Wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other:
- ☐ Water plants: water lily, eelgrass, millfoil, other:
- ☐ Other types of vegetation: Blackberry

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

None.

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

None are known.

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

None.

5. **ANIMALS**

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

Birds:
☒ Hawk, ☒ Great Blue Heron,
☒ Eagle, ☒ Songbirds;
☒ Other: Ducks, Geese, Cormorant, Gulls, Terns

Mammals:
☒ Deer, ☐ Bear,
☐ Elk, ☐ Beaver;
☒ Other: Otter

Fish:
☐ Bass, ☒ Salmon,
☐ Trout, ☐ Herring,
☒ Shellfish; ☒ Other: Forage Fish

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

The Project will occur exclusively on the upland property above mean higher high water; however, federally listed or threatened species that could occur in Bellingham Bay, adjacent to the site, include Chinook salmon, marbled murrelet, steelhead, bull trout, and Southern Resident orca.

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

Yes. All lands within the Whatcom County lowlands are within the Pacific Migratory Flyway. Birds that inhabit the area vary seasonally due to migration.

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

The Project is being conducted as a remedial action to mitigate site contamination. The removal, treatment, and engineered containment of site contaminants to be achieved by the Project will prevent exposure and contribute to long-term environmental improvements.

6. **ENERGY AND NATURAL RESOURCES**

a. What kind 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.

No long-term energy needs required for completed Project; however, fossil fuels and electric power will be required for the construction Project.

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

No.

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:

There are no energy needs for this Project once cleanup construction is complete, therefore, none are proposed.

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.

During the cleanup Project there could be small-scale accidental spills or leakage of petroleum products from construction equipment. Handling of the contaminated soil and debris being excavated may result in short-term worker exposure to contaminants.

1) Describe special emergency services that might be required?

None are anticipated.

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

Standard handling procedures and BMPs will be in place and conducted in accordance with MTCA site requirements. Contractors will be required to develop and comply with site-specific Health and Safety Plan, including appropriate Hazardous Waste Operations and Emergency Response (HAZWOPER) training, as well as a Spill Prevention, Control, and Countermeasures Plan. Air monitoring for mercury vapors will be conducted within the Project area during construction activities involving disturbance of soils containing elemental mercury. Following completion of the Project, the site will pose no unacceptable risks to human health or the environment; however, site access will continue to be restricted until additional institutional controls are put in place to ensure public safety.

b. Noise

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

Existing noise 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 long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Typical construction noise from vehicles and equipment would be expected on a short-term basis during daytime hours. No long-term noise is anticipated from this Project.

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

Equipment will be appropriately sized for operations needed and running only when necessary, and during work hours prescribed in City of Bellingham ordinance.

8. **LAND AND SHORELINE USE**

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

The site and adjacent properties are vacant industrial properties. The BNSF Railway mainline bounds the eastern portion of the site. The Bellingham Shipping Terminal bounds the site to the south.

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

No.

c. Describe any structures on the site.

There are no structures within the Chlor-Alkali Remedial Action Unit where the Project will occur.

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

No.

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

The majority of the site is zoned Industrial Mixed-Use. A portion of the site at the intersection of Laurel Street and Cornwall Avenue is zoned Mixed-Use.

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

Industrial/Waterfront Mixed-Use.

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

Waterfront District Water-Oriented Uses, and Waterfront District Recreational Uses.

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

The Project area has been identified as a very high seismic hazard area. Although the Project only pertains to upland work, the adjacent marine shorelines are designated as environmentally sensitive areas under the City's Critical Areas Ordinance. The adjacent Whatcom Waterway is designated as critical habitat for Chinook salmon, bull trout, and orca. This area would be considered a designated Fish and Wildlife Habitat Conservation Area (BMC 16.55.470) and Critical Saltwater Habitat (BMC 22.08.040).

i. Approximately how many people would reside or work in the completed Project?

N/A

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

N/A

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

N/A

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

The Project will remove for off-site disposal, treat in place, or safely contain existing contaminated soil and groundwater at the site. The Project is consistent with the Port and City land use and, although there will be no changes to existing site uses as a direct result of the Project, the Project will facilitate the initial phases of infrastructure and redevelopment to occur on the anticipated timeframe.

9. **HOUSING**

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

N/A.

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

N/A.

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

N/A.

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 permanent structures are proposed as part of the Project.

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

None.

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

N/A.

11. **LIGHT AND GLARE**

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

None.

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

N/A.

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

None.

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

N/A.

12. **RECREATION**

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

Waypoint Park is located approximately 1,000 feet north of the Project site. Public access to the Project site is currently restricted due to historical contamination and public safety concerns, and no recreational opportunities are available at the site. The adjacent waters of Whatcom Waterway and Bellingham Bay are used by recreational boaters and small personal watercraft such as kayaks etc.

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

No.

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

The Project site currently does not support recreation. However, portions of the Project site are planned for completion as public access and park under the Waterfront District sub-area plan. The proposed Project will ultimately enhance public access to the site by completing cleanup within areas anticipated to include public access or parks. Details for public access and park components will be developed separately.

13. **HISTORIC AND CULTURAL PRESERVATION**

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

None of the structures currently located on the Project site are listed on the National Register of Historic Places (NRHP), the Washington Historic Register (WHR), or the Bellingham Local Landmark Registry (BLLR).

Although no archaeological resources have been recorded on the Site, it is located within an archaeologically sensitive area of former tidal flats near the mouth of Whatcom Creek and the bluffs to the south. The ancestors of the Lummi Nation inhabited and utilized the area, and appear to have established seasonal fishing encampments near the creek mouth. Appendix M to the Waterfront District FEIS presents the expected probabilities (high, medium, low) for the presence of Native American archaeological materials beneath the Site and surrounding areas. Based on the FEIS information, the probability is predominantly low to moderate within the entire Project site, and all areas where subsurface disturbance (excavation or ISS) is planned are low to moderate probability.

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

No landmarks or evidence of historic, archaeological, scientific, or cultural importance are known to exist on or immediately next to the Project site.

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

Prior to the construction project, an Inadvertent Discovery Plan will be developed detailing procedures and protocols for unanticipated discoveries of cultural resources and then will be implemented during subsurface construction activities.

The Project soil removal will occur in Fill Unit soils overlaying native tidal flat soils, within medium or low probability zones for archaeological artifacts. However, there is a possibility that buried cultural artifacts could be discovered at the top of the native soil horizon if an excavation extends to that depth. If apparent archaeological artifacts are encountered, the Port will be notified immediately. The Port will notify Ecology, DAHP, the Lummi Nation, and Nooksack Tribe, and will invite the parties to attend an on-Site inspection with a professional archaeologist contracted by the Port. The archaeologist will document the discovery in a report submitted to DAHP so that they may control access to information regarding potential sensitive-site locations, in accordance with Chapter 27.53 RCW; the report will be referenced, but not included, in reports for the cleanup work; and in the event of an inadvertent discovery of potential human remains, work will be immediately halted in the discovery area and the apparent remains will be covered and secured against further disturbance. The City of Bellingham Police Department and Whatcom County Medical Examiner would be immediately contacted, along with DAHP and authorized Tribal representatives. A treatment plan would be developed by a professional archaeologist in accordance with applicable state law.

14. **TRANSPORTATION**

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

The site is accessible by Cornwall Avenue.

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

No. The site is located within one mile of a public transit stop.

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

None.

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

No.

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

No.

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

Excavated soil will be transported from the Site to a permitted and licensed off-site disposal facility to be selected by the Project contractor. Based on the anticipated volume of soil to be removed it is expected that, during construction, up to 15 truck trips per day will be generated. In addition, construction workers would likely generate up to 15 trips per day and up to 10 peak hour trips.

Following completion of the Project, vehicular traffic is not anticipated to change as a result of the Project.

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

Truck traffic will be routed from Cornwall Avenue to the designated truck route along Roeder Avenue.

15. **PUBLIC SERVICES**

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

No.

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

N/A

16. **UTILITIES**

a. Check utilities currently available at the site:

- ☒ Electricity,
- ☒ Water,
- ☐ Telephone,
- ☐ Septic system,
- ☐ Natural gas,
- ☐ Refuse service,
- ☐ Sanitary sewer,
- ☐ Other:

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.

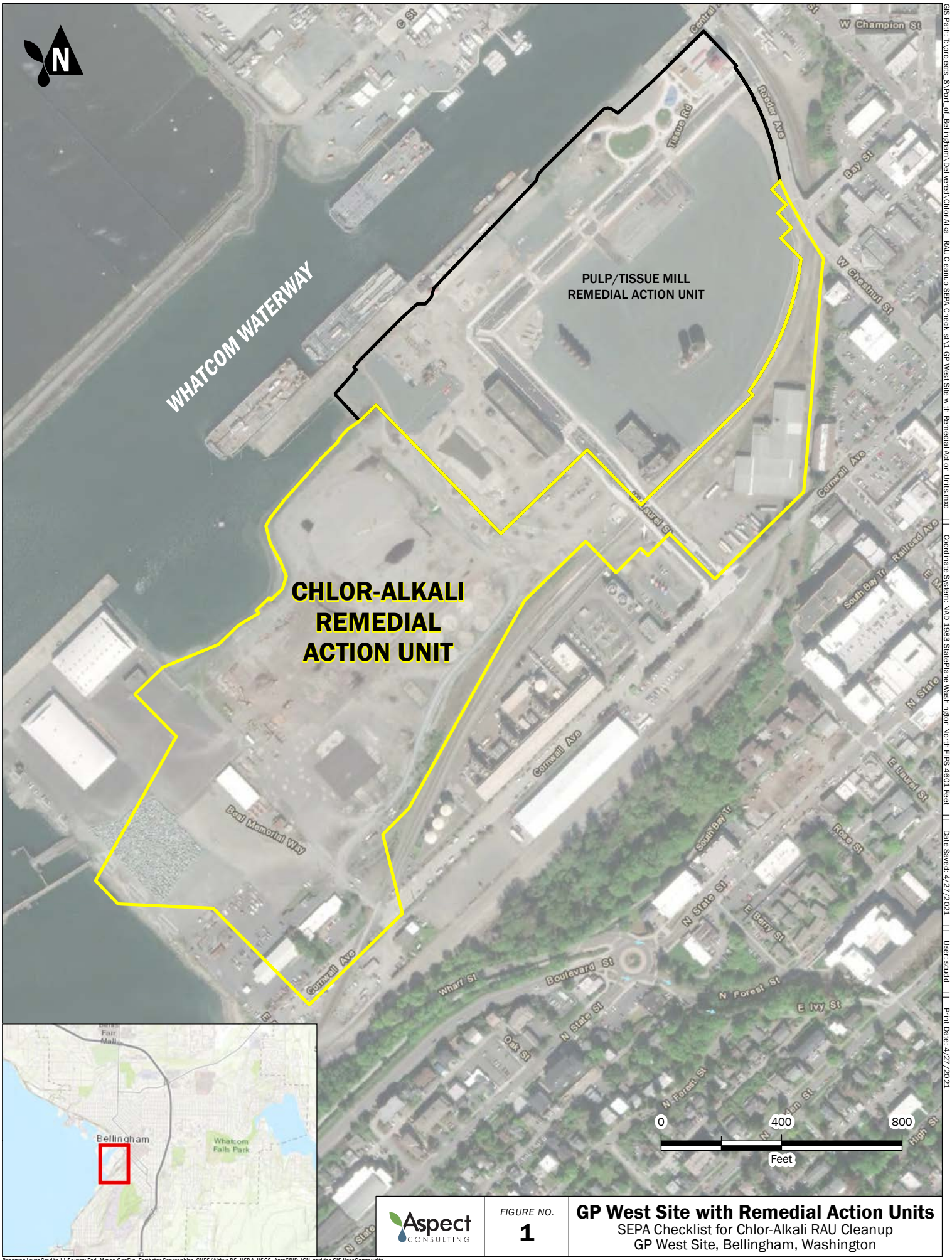
None.

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: _____

Date Submitted: 5/28/2021



Aspect CONSULTING

FIGURE NO. 1

GP West Site with Remedial Action Units
SEPA Checklist for Chlor-Alkali RAU Cleanup
GP West Site, Bellingham, Washington

Basemap Layer Credits | | Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Esri, HERE, Garmin, (c) OpenStreetMap contributors

GIS Path: T:\projects_8\Port_of_Bellingham\Delivered\Chlor-Alkali RAU Cleanup SEPA Checklist\1 GP West Site with Remedial Action Units.mxd || Coordinate System: NAD 1983 StatePlane Washington North FIPS 4601 Feet || Date Saved: 4/27/2021 || User: soudd || Print Date: 4/27/2021

Whatcom Waterway

Log Pond

Bellingham Bay

Wastewater Settling Basin

Chlor-Alkali RAU

Chemfix

Chlorine Plant Area

Million Gallon Tanks

BNSF Property

Stormwater Swale

Laurel St. Pipe Rack

Pulp/Tissue Mill RAU

BNSF Property

Lignin Warehouse B

Port Easement for BNSF Rail Line (approx.)

Tax Parcel Lines (Bellingham GIS)

Property Boundaries from ALTA Survey (David Evans and Associates, 2004)

Cleanup Construction Components

- Soil Removal/Offsite Disposal
- Soil Removal/Consolidation on Port-Owned Portion of Stormwater Swale (Prior to Capping)
- Removal of Obstructions and ISS of Soils
- Hard Cap to Limit Stormwater Infiltration and Soil Exposure and Erosion
- Trench for Neutralization of Groundwater with Elevated pH

MILL NORTH

TRUE NORTH

45

0 110 220 440 660 880 Feet

Components of Cleanup Construction Project

SEPA Checklist for Chlor-Alkali RAU Cleanup
GP West Site, Bellingham, Washington

Aspect CONSULTING

MAY-2021	BY: DAH / RAP	FIGURE NO. 2
PROJECT NO. 070188	REVISED BY: SCC	

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