STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

Southwest Region Office

PO Box 47775 • Olympia, Washington 98504-7775 • 360-407-6300

STATE ENVIRONMENTAL POLICY ACT

DETERMINATION OF NONSIGNIFICANCE

Date of Issuance: June 26, 2023

Lead agency: Department of Ecology, Toxics Cleanup Program, Southwest Region

Agency Contact: Andrew Smith, Cleanup Project Manager, andrew.smith@ecy.wa.gov; 360-485-3987

Permit Number: Work is to be performed under the authority of a Model Toxics Control Act Agreed Order No. DE 19602

Description of proposal:

The proposed project is implementation of the Cleanup Action Plan for the Cadet and former Swan portions of the Site. Prior cleanup actions by the port and others have eliminated nearly all contamination, with a small area remaining on the Swan portion and very limited areas of dispersed low-level groundwater contamination in the Site.

More than 20 years of groundwater data and detailed groundwater modelling have demonstrated no impact to the Columbia River associated with the Cadet and Swan portions of the Site. The Cleanup Action Plan details the final cleanup action for Cadet and Swan. The plan includes the following primary actions:

- Establishing institutional controls and potential site development considerations for the former Swan portion
- Development of operations and cleanup contingency plans
- Groundwater pump and treatment system shutdown
- Groundwater monitoring to confirm monitored natural attenuation
- Groundwater pump and treatment system dismantling

Location of proposal: The work will be employed between 2001 and 2501 West Fourth Plain Boulevard and at 2500 West Fourth Plain Boulevard, Vancouver, WA.

Applicant/Proponent: Port of Vancouver

Project Representative: Patty Boyden, Director of Environmental Services
E-MAIL: pboyden@portvanusa.com
PHONE: 360-992-1103
ADDRESS: 3103 NW River Rd, Vancouver WA 98660-1027

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). We have reviewed the attached Environmental Checklist, as well as the Supplemental Remedial Investigation/Feasibility Study and public review draft Cleanup Action Plan. These documents are available at:

Vancouver Community Library, 901 C Street., Vancouver, WA 98660

Ecology Lacey Office (by appointment), 300 Desmond Drive SE, Lacey, WA 98503

This determination is based on the following findings and conclusions:

- The project will reduce concentrations of volatile organic compounds in the soil and groundwater.
- A Groundwater Monitoring Plan, an Operation Plan and a Cleanup Contingency Plan will be prepared and approved by Ecology to provide a framework for monitoring groundwater conditions and contingencies following shutdown of the pump and treatment system.
- The Port will prepare and record an environmental covenant documenting conditions and restrictions where the site intersects Port controlled properties.
- The Port will perform monitored natural attenuation groundwater monitoring in accordance with the Groundwater Monitoring Plan.
- The Ecology cleanup project manager will provide oversight during project activities.

The comment period for this DNS corresponds with the comment period for the Remedial Investigation Report, Feasibility Study, Public Review Draft Cleanup Action Plan and associated Agreed Order. The comment period begins on July 13, 2023 and ends on August 11, 2023.

Responsible official:

Rebecca S. Lawson, P.E., LHG
Section Manager
Toxics Cleanup Program
Southwest Region
Department of Ecology
P.O. Box 47775
Olympia, WA 98504-7600
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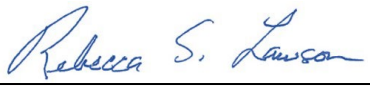
Signature 

Date 06/27/2023

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background [HELP]

1. **Name of proposed project, if applicable:**
   Cadet & Swan Cleanup Action Plan Implementation

2. **Name of applicant:**
   Port of Vancouver

3. **Address and phone number of applicant and contact person:**
   Patty Boyden
   Port of Vancouver
   3103 NW River Road
   Vancouver, WA 98660-1027
   Phone: 360-992-1103
   Fax: 360-735-1565
   Email: pboyden@portvanusa.com

4. **Date checklist prepared**: September 26, 2022

5. **Agency requesting checklist:**
   Washington Department of Ecology (Ecology)

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

   The objective of the proposed project is to implement a Cleanup Action Plan for the Cadet Manufacturing Company (Cadet) and former Swan Manufacturing Company (Swan) portions of a larger cleanup site referred to in the Ecology database as the "Vancouver Port of NuStar Cadet Swan" site. The site is located in Vancouver, Washington. The locations of Cadet and the former Swan sites are included on Figure 1. The larger cleanup site is shown on Figure 2 and is referred to herein as the "Site." The project includes shutdown of the Port of Vancouver's (the port's) active groundwater pump and treatment system, continued groundwater monitoring to confirm that concentrations continue to naturally decrease over time, and eventual dismantling of the pump and treatment system. The groundwater pumping well building and treatment plant are shown on Figure 3 and are referred to herein as the "Action Area." The general schedule is as follows:

   - Shutdown of groundwater pump and treatment system – after Ecology approval of documents required as part of Cleanup Action Plan, including Operation Plan, Groundwater Compliance & Monitoring Plan, and Contingency Plan.
   - Groundwater monitoring to confirm monitored concentrations naturally decrease over time – Estimated 2023-2027.
   - Dismantling of the pump and treatment system – To be determined based on groundwater monitoring results and Ecology approval.

   The duration of groundwater monitoring and schedule for dismantling of the pump and treatment system depends on the confirmation by groundwater monitoring that the overall cleanup objectives approved by Ecology are achieved.

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

No future additions, expansions, or further activity related to this proposed project are planned.

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

Extensive site investigations and cleanup actions have been conducted for the Cadet and Swan sites in accordance with the Model Toxics Control Act (MTCA) as defined in Washington Administrative Code (WAC) 173-340, and pursuant to requirements established in Ecology Agreed Orders (AOs). The current status is as follows:

- The cleanup actions have eliminated nearly all contamination, with a small area remaining on the Swan site (which is located at the Port of Vancouver and zoned industrial) and very limited areas of dispersed low-level groundwater contamination in the overall Site.
- In 2022, a Feasibility Study was conducted by the port to evaluate final cleanup alternatives for Cadet and Swan.
- Based on the recommendations in the Feasibility Study, Ecology prepared a Draft Cleanup Action Plan in 2022 that includes required final cleanup actions. This SEPA Checklist is for the implementation of the Cleanup Action Plan.

Ecology will be conducting a public comment period for these documents, including this SEPA Checklist, anticipated in early 2023. Listed below are technical documents prepared as part of the overall project that provide extensive background information relevant to this SEPA Checklist.

Ecology. 2022. Draft Cleanup Action Plan Cadet Manufacturing Company and Swan Manufacturing Company Portions, Vancouver Port of NuStar Cadet Swan Site. Prepared by the Washington State Department of Ecology, Vancouver, Washington. July 2022.

Parametrix. 2022. Feasibility Study, Cadet Manufacturing Company and Swan Manufacturing Company Portions, Vancouver Port of NuStar Swan Cadet Site. July 2022.

Parametrix. 2021. 2020 Annual Environmental Monitoring Report, SMC and Cadet Sites. Prepared for the Port of Vancouver, Vancouver, Washington. February 2021.

Parametrix. 2010. Final Remedial Investigation Report, Cadet Manufacturing Company Site. Prepared for Port of Vancouver. May 2010.

Parametrix. 2009. Port of Vancouver Groundwater Pump and Treat Interim Action SMC/Cadet Commingled Plume System Startup Summary Memo. Prepared for Port of Vancouver. October 2009.

Parametrix. 2009. Port of Vancouver As-Built Report for Groundwater Pump and Treat Interim Action SMC/Cadet Commingled Plume. Prepared for Port of Vancouver. July 2009.

Parametrix. 2009. Final RI Report, Former Building 2220 Site (Swan Manufacturing Company Site). Prepared for the Port of Vancouver, Vancouver, Washington. May 2009.

Parametrix. 2008. Final Engineering Design Report Groundwater Pump and Treat Interim Action SMC/Cadet Commingled Plume. Prepared for the Port of Vancouver. August 2008.

Port of Vancouver. 2007. SEPA Checklist, Port of Vancouver Groundwater Pump and Treat Interim Action. Prepared for the Port of Vancouver. December 2007.

Additional environmental information can be found on Ecology's project website:

https://apps.ecology.wa.gov/cleanupsearch/site/3450

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.

There are no pending applications affecting the Action Area.

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

The following is a list of permits or approvals that will either be required or subject to review by the local jurisdiction per MTCA provisions. Permits/approvals that will be sought by the project applicant and substantive reviews required per the MTCA exemption are noted:

- Building Permit for groundwater pump and treatment system dismantling (City of Vancouver) – MTCA exemption
- Demolition Permit (City of Vancouver)
- Notification of Demolition (SWCAA)

The following permits will be terminated as part of the groundwater pump and treatment system dismantling process:

- NPDES Waste Discharge Permit #WA0039942 (Ecology, treated groundwater)
- Air Discharge Permit #ADP 12-3024 (SWCAA, air discharge)
- Wastewater Discharge Permit #2008-06 M1 (City of Vancouver, process wastewater)

11. Give 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.)

The proposed project is implementation of the Cleanup Action Plan for the Cadet and former Swan portions of the Site. Prior cleanup actions by the port and others have eliminated nearly all contamination, with a small area remaining on the Swan portion and very limited areas of dispersed low-level groundwater contamination in the Site.

More than 20 years of groundwater data and detailed groundwater modelling have demonstrated no impact to the Columbia River associated with the Cadet and Swan portions of the Site. The Cleanup Action Plan details the final cleanup action for Cadet and Swan. The plan includes the following primary actions:

- Establishing institutional controls and potential site development considerations for the former Swan portion
- Development of operations and cleanup contingency plans
- Groundwater pump and treatment system shutdown
- Groundwater monitoring to confirm monitored natural attenuation
- Groundwater pump and treatment system dismantling

Details for these actions are provided below.

Institutional Controls and Site Development Considerations

Institutional controls in the form of a restrictive covenant would be placed on the port-owned Swan portion of the Site to eliminate the possibility of the future placement of a groundwater well on the Site for drinking water use. Drinking water in the vicinity of the Action Area is currently, and will continue to be, provided by a public water utility. In addition, a restrictive covenant for future use of the Swan portion of the Site would be established. The Swan portion is currently zoned and used for industrial purposes. This land use would be maintained; no residential development would be allowed.

Site development considerations, including a requirement of assessment and, if appropriate, mitigation of potential vapor intrusion would be placed on potential future development of the former Swan portion for office space or other occupied building use.

Development of an Operations Plan and Cleanup Contingency Plan

An operations plan would be prepared and include procedures for shutdown of the groundwater pump and treat system, maintenance of the system during the shutdown period, restarting the system (if necessary), and permanent dismantling of the groundwater pump and treat system. The operations plan and contingency plan would be prepared by the port and submitted to Ecology for review and approval.

A contingency plan would be prepared to define the methods and procedures for further assessment or actions if the cleanup action is not performing as expected. The contingency plan would include:

- Criteria that would trigger additional actions, such as an increase in concentrations or trends in specific wells or areas.
- A decision matrix based on the established criteria that will indicate if actions such as additional sampling or frequency of monitoring, further investigation, or potentially restarting of the groundwater pump and treatment system are warranted.
- Methods and protocols for trend analysis of groundwater concentrations that will be used as part of the decision matrix.

Groundwater Pump and Treatment System Shutdown

The groundwater pump and treatment system would be turned off after Ecology approval of the operations plan, which is expected to occur in 2023. Details related to the pump and treatment system are included on Figure 3. The shutdown process would be completed in a manner that allows for restart of the system in the future, if required by Ecology, by the procedures to be documented in the contingency plan.

Groundwater Monitoring to Confirm Monitored Natural Attenuation

Groundwater monitoring of existing wells located in the vicinity of the Site would be conducted until points of compliance meet Ecology cleanup levels.

Groundwater Pump and Treatment System Dismantling

The pump and treatment system would be permanently dismantled in accordance with the operations plan after groundwater concentrations meet cleanup levels and Ecology approves this final action. This is expected to be achieved approximately 5 to 10 years after the system shutdown. Specific details regarding the dismantling process are not completely defined at this time, and the port will seek input from the City of Vancouver pursuant to the April 21, 2008 interlocal agreement. However, the dismantling would likely include removal of the entire above-ground treatment system, including all equipment, tanks, air strippers, well pump house, and other infrastructure. Except for the extraction well and the underground piping from the well house to the treatment system (a distance of approximately 900 feet), all equipment is above-ground and dismantling would not require significant ground disturbance. It would be expected that once all equipment is removed, the ground would be restored to the existing impervious nature (i.e. concrete or asphalt associated with the adjacent facility). The pumping well would be decommissioned in accordance with Ecology requirements, which would generally require placing bentonite from the bottom of the well to the near surface. Decommissioning of the underground conveyance line from the pump house to the treatment system is not know at this time, but likely would involve plugging the line at each end or removing the entire structure.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

The proposed project is located at the port in the City of Vancouver west of the Interstate 5 Bridge crossing. The Action Area is adjacent to and south of Fourth Plain Boulevard and west of Mill Plain Boulevard (Figure 1). The Action Area is in the southwest quarter of Section 21, Township 2 North, Range 1 East.

The groundwater pumping well building and treatment plant are located at 2471 Saint Francis Lane and 2210 Saint Francis Lane, respectively (Figure 3)

B. Environmental Elements [HELP]

1. *Earth* [help]

a. General description of the site:

(circle (highlight) one): Flat, rolling, hilly, steep slopes, mountainous, other

The Site as a whole is relatively flat. It is located within developed industrial, residential, and commercial lands north of the Columbia River.

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

The existing stormwater pond located near the existing pipeline extension (i.e., where piping for the treated water discharge connects into existing stormwater piping) on the north side of the railroad tracks has the steepest slope on the Site, with slopes at approximately 3:1.

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.

Soils on the Site are primarily sand and silty sand. There are no soils classified as agricultural or prime farmland within the Action Area or overall Site.

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

The majority of the Site and surrounding area is mapped as moderate to high liquefaction hazard, with some areas of very low to low liquefaction hazard. There are no mapped landslide hazard areas in the vicinity.

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.

Minor filling and excavation will likely occur to remove the foundations of the treatment system and groundwater pump well house. The areas of the treatment system and groundwater pump well house would be regraded to match surrounding grades after system dismantling.

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

Erosion is not anticipated after dismantling of the system as the area is flat. However, very minor erosion could occur during dismantling, but erosion control best management practices will be applied.

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

The area immediately surrounding the groundwater pump well house is currently unpaved. After dismantling of the treatment system, the area currently occupied by the well house would be finished with pervious materials. The treatment facility was constructed on an area previously paved with asphalt, which would remain after dismantling the system.

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

Typical best management practices for sedimentation and erosion control will be implemented during construction. Such measures include, but are not limited to, the use of silt fences and straw wattles.

2. Air [help]

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.**

Pump and Treatment System Operation
Turning off and eventually dismantling the pump and treatment system would eliminate the current permitted discharge of volatile organic compounds. Currently, groundwater is pumped at the well house to the treatment system, where it flows down through air strippers while air is blown up through the strippers, removing the volatile organic compounds from groundwater. The stripped volatile organic compounds are discharged to air through the air stripper stacks. Shutdown of the groundwater pump and treat system would eliminate the permitted emission of low concentrations of volatile organic compounds to the air.

Volatile organic compound emissions would occur consistent with current levels (below permit limits) if the groundwater pump and treatment system were to be restarted after shutdown (in coordination with Ecology).

Emissions During Pump and Treatment System Dismantling
Temporary, minor emissions from vehicles and dust from limited grading activities is anticipated during dismantling of the pump and treatment system.

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 may affect the proposal.

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

Turning off and eventually dismantling the pump and treatment system would eliminate current permitted emissions from the system.

3. Water [help]

a. Surface Water: [help]

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 Columbia River is approximately 1,400 feet from the treatment plant and flows directly to the Pacific Ocean, about 100 miles downstream from the Site. Two artificial stormwater ponds are located immediately adjacent to the treatment plant water discharge line. Two other stormwater ponds are located about 548 feet south and about 249 feet east of the treatment plant water discharge line (Figure 3). Stormwater from these ponds is conveyed through an existing permitted underground storm drain that discharges to the Columbia River.

Vancouver Lake is located northeast of the project area with the lowlands situated approximately one mile east.

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.

No proposed project construction would occur within 200 feet of federal or state jurisdictional surface waters. However, the dismantling of the treatment system would include capping discharge pipes that connect the system to an existing storm drain that discharges to the Columbia River.

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 dredge or fill material would be discharged to surface waters or wetlands.

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

The proposed project would 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.

FEMA flood mapping shows the Action Area, specifically the pump house and some of the underground piping, to be located partially within the 500-year floodplain. Other portions of underground piping are within the 100-year floodplain, and the treatment facility is located outside of the floodplain.

The foundation for the pump house was constructed to be above the 100-year flood elevation. The treatment facility is at elevation 31 feet and is therefore well above the 100-year flood elevation.

Some additional areas within the Site are within the 100-year floodplain, including areas south and east of the pump house and treatment facility, and areas surrounding the Cadet portion (see Figure 4).

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 waste materials would be discharged to surface waters as part of the proposed project. Upon shutdown of the treatment system, treated groundwater would no longer be discharged to the Columbia River. If the system is restarted as a result of monitoring, discharge of treated water to the river would resume, as currently permitted.

b. Ground Water: [help]

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.

Groundwater is currently pumped at the well house and conveyed to the treatment system. As part of the proposed project, the pumping well would be decommissioned in accordance with Ecology requirements as part of the treatment system dismantling.

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.

No waste material would be discharged into the ground from septic tanks or other sources.

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.

Dismantling of the well house would slightly reduce stormwater runoff as the well house is approximately 500 square feet. Runoff generated from current project facilities is collected and treated by an existing stormwater system.

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

No new waste materials would be generated as part of the proposed project. The shutdown of the treatment system would cease to discharge treated groundwater to surface waters. If Ecology requires that the system is reengaged as a result of monitoring, the same treated groundwater would again be discharged, as currently permitted.

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

The proposed project does not alter or otherwise affect drainage patterns in the vicinity of the Action Area.

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

Stormwater runoff in the vicinity of the pump well house and treatment plant is conveyed to the existing stormwater treatment system. During dismantling of the well house and treatment system appropriate BMPs will be in-place to minimize potentially turbid water from leaving the work area.

Currently, the port discharges treated water to the Columbia River under an NPDES permit. This discharge would not occur when the treatment system is off, and would permanently terminate when the treatment system in dismantled.

4. Plants [help]

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

__x__ deciduous tree: alder, maple, aspen, other
__x_ evergreen tree: fir, cedar, pine, other
__x__ shrubs
__x__ grass
_____ pasture
_____ crop or grain
_____ Orchards, vineyards or other permanent crops.
_____ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
_____ water plants: water lily, eelgrass, milfoil, other
__x__ other types of vegetation (herbaceous weeds)

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

During dismantling of the treatment system and decommissioning of underground discharge pipes, it is possible some disturbance of grass areas may occur.

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

There are no threatened or endangered plant species known to be on or near the Site. The Washington Natural Heritage Information System lists several plant species for Clark County, with one recorded as occurring within the floodplain of the lower Columbia River. However, the potential for this water howellia (*Howellia aquatilis*) to occur within the Site is considered very low because the species requires clay and organic soils, semipermanent water, and overhanging deciduous trees, which are not characteristics of the surrounding area.

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

During dismantling of the treatment system and decommissioning of underground discharge pipes, it is possible some disturbance of grass areas may occur, which would be replaced in kind.

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

The invasive Himalayan blackberry (*Rubus armeniacus*), false indigo, and invasive grass species exist throughout the lower Columbia River area and are likely present within the Site.

5. Animals [help]

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.

Examples include:

birds: hawk, heron, eagle, songbirds, other
mammals: deer, bear, elk, beaver, other

fish: bass, salmon, trout, herring, shellfish, other

The following animals have been observed on or near the Site, or are known to be on or near the Site:
Birds: hawks, heron, eagle, songbirds, bald eagle, streak horned lark, sandhill cranes, osprey, Canada goose, American crow, barn owl, cliff swallows, European starling, Eurasian collared dove
Mammals: beaver, California and Stellar sea lions, harbor seals, coyote
Fish: bass, salmon, trout, forage fish typical of freshwater systems, smelt, sturgeon

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

Streaked horned larks (*Eremophila alpestris strigata*) are listed as Threatened under the federal Endangered Species Act (ESA) and have been documented at the port's Parcel 3 dredge deposit site located downriver approximately 3.5 miles from the Site. However, they have not been noted in surveys since 2016. Streaked horned lark critical habitat includes several specifically identified sandy dredge deposit locations in and adjacent to the Lower Columbia River, but critical habitat is not documented within port facilities or Clark County. The nearest designated critical habitat is downstream of the port, near Kalama, Washington.

The following are other special status species that may occur within or near the port. These special status species may include species protected by other federal regulations (e.g., the Marine Mammal Protection Act, Migratory Bird Treaty Act, or Bald and Golden Eagle Protection Act), state-listed endangered or threatened species, or other sensitive species:

- Steller sea lion (Eastern DPS) *(Eumetopias jubatus):* The Eastern DPS of Steller sea lion was delisted from the Endangered Species list on November 4, 2013. Steller sea lions are still listed as threatened by the State of Washington.
- Sandhill crane *(Grus canadensis)*: Sandhill cranes are listed by the Washington Department of Fish and Wildlife (WDFW) as endangered but are not federally listed under the ESA. Sandhill cranes are known to occur in the vicinity of the port in the Vancouver Lake Lowlands (Lowlands). WDFW has mapped migratory occurrence locations of sandhill cranes on agricultural land west of the Site at the port's Parcel 3, and areas north of the Flushing Channel known as Cranes' Landing. Fall migration of cranes in the Lowlands typically occurs in late September and early to mid-October. Spring migration through the Lowlands generally occurs from mid-March to mid-April. The Lowlands are used as stopover habitat during migration and for foraging by overwintering birds. Cranes are known to rest and feed on Parcel 3 but more commonly use the land north of the flushing at Cranes' Landing, which is managed to provide wintering food for migrating and staging flocks of sandhill cranes, as well as other geese, ducks, raptors, and mammalian species, by Columbia Land Trust. A berm has been constructed on Parcel 3 to provide a buffer for sandhill crane habitat to the north at Cranes' Landing.
- Bald eagle *(Haliaeetus leucocephalus):* The bald eagle is currently a species of concern (federal) and state-listed sensitive. Bald eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act and are listed by the state as sensitive. The USFWS National Bald Eagle Management Guidelines recommend that potentially disturbing activities occur outside a 660-foot protective buffer around an active nest during the nesting season, which generally occurs January to August.
- Western pond turtle (*Actinemys marmorata*): Western pond turtles (also known as Pacific pond turtles), a state-listed endangered species, have not been documented as occurring in the vicinity of the port but have been documented in Clark County and have the potential to occur in the port area.

- Osprey *(Pandion haliaetus):* Osprey are not ESA- or state-listed but are considered a state-monitored species.
- Pacific lamprey (*Entosphenus tridentatus*)
- Other migratory birds

There are numerous other species that are listed and have known occurrences or historic ranges in Washington but are not likely to occur on or near the port. Examples include the northern spotted owl (*Strix occidentalis caurina*), Oregon spotted frog (*Rana pretiosa*), yellowbilled cuckoo (*Coccyzus americanus*), marbled murrelet (*Brachyramphus marmoratus*), gray wolf (*Canis lupus*), and Columbian white-tailed deer (*Odocoileus virginianus leucurus*). USFWS listed the Taylor's checkerspot butterfly (*Euphydryas editha taylori*) as threatened and also designated critical habitat for the species. There is no critical habitat designated for this species on or near the port.

The Columbia River is approximately 1,400 feet from the Action Area. The following threatened and endangered species, or evolutionarily significant units (ESUs) and their distinct population segments (DPS), exist within the Columbia River near the Port of Vancouver. No work would occur within and no new discharges to the Columbia River are proposed. Aquatic species listed below have known occurrences in the Columbia River but are not present within the Site.

- Chinook salmon *(Oncorhynchus tshawytscha)*: Lower Columbia River ESU, Upper Willamette River ESU, Upper Columbia River spring-run ESU, Snake River spring/summer-run ESU, Snake River fall-run ESU
- Chum salmon *(Oncorhynchus keta)*: Columbia River ESU
- Coho salmon *(Oncorhynchus kisutch)*: Lower Columbia River ESU
- Sockeye salmon *(Oncorhynchus nerka)*: Snake River ESU
- Steelhead *(Oncorhynchus mykiss)*: Lower Columbia River ESU, Upper Willamette River ESU, Middle Columbia River ESU, Upper Columbia River ESU, Snake River Basin ESU
- Green sturgeon *(Acipenser medirostris)*: Southern DPS
- Eulachon *(Thaleichthys pacificus)*: Southern DPS
- Bull trout *(Salvelinus confluentus):* Columbia River DPS

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

The general area of the Site is within the Pacific Flyway, a broad migratory corridor that extends from Alaska to Central America and is used by waterfowl, eagles, hawks, falcons, songbirds, sandhill cranes, and shorebirds (WDFW, Management Recommendations for Washington's Priority Species, Volume IV: Birds). The Columbia River serves as a migration corridor for salmonids.

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

Bird monitoring will be conducted prior to construction to determine if any deterrent measures or construction best management practices are warranted. While unanticipated, if removal of an active nest is required during dismantling, the appropriate permits and approvals will be obtained prior to any removal activities.

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

Two animal species from Washington's comprehensive list of invasive animals, plants,

microorganisms, or pathogens have been observed within the lower Columbia River, although no sightings have occurred within the Action Area. These include the bullfrog *(Rana catesbeiana*) and the nutria (*Myocastor coypus*).

6. Energy and Natural Resources [help]

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.

Shutdown and eventual dismantling of the groundwater pump and treatment system would remove the need for electricity to be provided for that activity.

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

The proposed project includes the removal of structures. Therefore, no loss in the potential use of solar energy at nearby properties is expected.

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:

As part of the port's overall initiative of evaluating operations relative to climate change impacts, the remedial alternatives for the groundwater cleanup were examined for potential climate change impacts and considered during the Feasibility Study evaluation.

An assessment of the groundwater pump and treatment system in the Feasibility Study concluded that continued operation of the pump and treatment system is no longer necessary for cleanup of the residual groundwater contamination. The Feasibility Study also included evaluation of a number of cleanup alternatives, including the recommended alternative of shutdown of the groundwater pump and treatment system in 2023, and another alternative that included continued operation of the system for 5 years to attempt to remove additional residual dispersed contamination. All other impacts being equal between the alternatives, the electrical use for operation of the pump and treatment system was determined to be the primary contributor to climate change impacts. A streamlined evaluation of potential impacts to climate change was completed as part of the Feasibility Study, primarily in the form of estimating the emissions of greenhouse gases (GHG) in operation of the pump and treatment system for the 5-year time period. Based on past and current electricity use for operation of the pump and treatment system, an estimate of potential GHG emissions was determined. Electricity use for the pump and treatment system was obtained from port records, which has tracked the annual electricity use since operation began in 2009 using Clark Public Utility data. The 2019 electricity usage rates, which represent average use rates over the operating period, were obtained from the port and were used in the evaluation. The electrical use solely associated with the pump and treatment system for 2019 was 0.89 megawatt hours (MWh). The state eGRID emission factors for carbon dioxide, methane, nitrogen and carbon dioxide equivalents were used and are expressed in pounds per MWh. The electricity rate was used along with the emission factors to estimate emissions of GHG from operation of the pump and treatment system in metric tons.

Based on this analysis the selected cleanup alternative, which includes shutdown of the groundwater pump and treatment system in 2023, would reduce annual GHG emissions associated with operation of the system by an estimated 0.1 tons per year.

While not expected to impact the feasibility of the project, the port and its facilities (including the Site and Action Area) will likely be subject to the ongoing effects of climate change, including more frequent extreme weather events.

7. Environmental Health [help]

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.

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

As detailed in responses to Questions 8 and 11, prior cleanup actions by the port and others have eliminated nearly all contamination in the vicinity of the proposed project, with a small area remaining on the Swan portion and very limited areas of dispersed low-level groundwater contamination in the overall Site. More than 20 years of groundwater data and detailed groundwater modelling have demonstrated no impact to the Columbia River associated with the Cadet and Swan portions.

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.

There are no existing hazardous chemicals/conditions that might affect project development and design.

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.

Gas, oil, and grease would be used for operation of equipment associated with the eventual dismantling of the well house and treatment system. Chemicals that are currently used in the groundwater treatment process would be removed from the Action Area upon dismantling of the treatment system.

4) Describe special emergency services that might be required.

Safety protocols will be developed by the dismantling contractor prior to project initiation to reduce the need for emergency services at the Action Area.

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

The shutoff and eventual dismantling of the treatment system would eliminate the discharge of volatile organic compounds to air. Potential environmental health hazards were assessed as part of the 2022 Feasibility Study for the Cadet and Swan portions. The recommended action was demonstrated to be protective of human health and the environment. Additionally, the alternatives evaluated in the Feasibility Study included an environmental justice evaluation, which is discussed below.

Environmental Justice Analysis

Ecology is updating the MTCA Cleanup Rule and has proposed the incorporation of environmental justice into remedy selection as part of the feasibility study process. In addition, the State of Washington enacted the Healthy Environment for All (HEAL) Act, E2SSB 5141, obligating state agencies, including Ecology, to incorporate environmental justice in the administration of environmental programs.

Although there are no current requirements for environmental justice considerations, the port determined that it would include environmental justice in the remedy selection process for the Feasibility Study.

One of the primary considerations in the environmental justice analysis is to determine whether a nearby community is considered a highly impacted community. Ecology defines a "highly impacted community" as likely to bear a disproportionate burden of public health risks from environmental pollution, such as minority, low-income, tribal or indigenous populations.

Analysis completed by the port determined a substantial population of highly impacted communities is located within the Fruit Valley Neighborhood, which is largely located within the Site (Figure 2). Therefore, environmental justice for the Fruit Valley Neighborhood was considered in the Feasibility Study and Cleanup Action Plan. Community outreach, including a web page update, news release, online survey, and mailed postcard, was conducted to support the environmental justice analysis. The results of the community outreach were considered in the evaluation of cleanup options. Specifically, a new evaluation criterion called Reduce Disparate Impacts was developed for the Feasibility Study to evaluate the cleanup alternatives on how they reduce, eliminate, or limit potential impacts to a particular community, and primarily includes environmental exposures such as drinking water, air emissions, contaminated soil contact, and other routes of exposure or impacts. The addition of this criteria enabled the port to consider environmental justice for the cleanup alternative selection with equal (and not disproportionate) weighting of the other Ecology-required evaluation criteria.

b. Noise

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

The port is a working waterfront and an active industrial area, with zoning that allows for noise-generating activities. The noise associated with standard operations at the port would not affect the proposed 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.

Short-term noise effects would result from dismantling of the well house and treatment plant. The construction equipment will operate at a similar volume to other industrial activities that occur on port-owned property, and the work is most likely to occur during standard working hours. Long-term noise effects would be associated with shutdown of pump operation and air stripper operation, which would eliminate an existing source of noise.

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

Dismantling activities would be conducted during normal work hours to minimize potential noise impacts and will comply with local noise ordinances. No other measures are proposed to reduce or control potential short-term noise impacts.

8. Land and Shoreline Use [help]

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 port is a working waterfront and an active industrial area.

The Site (Figure 2) consists of industrial development, transportation facilities for auto, truck, and rail, and the North and South Fruit Valley residential neighborhoods to the north and east of the well house. No impacts to residential areas or other surrounding land uses are expected from the proposed project.

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 Action Area has not been used as working farmlands or forest lands.

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 would not affect, nor be affected by surrounding working farmlands or forest lands.

c. Describe any structures on the site.

The structures associated with the groundwater pump and treatment system consist of an above-ground treatment system, equipment, tanks, air strippers, well pump house, and other infrastructure.

Structures on the Site include industrial buildings and associated accessory structures, single family and multifamily residences and associated accessory structures in the North and South Fruit Valley Neighborhoods, and commercial structures along W Fourth Plain Boulevard, including a gas station and various neighborhood scale businesses.

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

Eventual dismantling would result in the removal of the existing treatment system - including all equipment, tanks, air strippers, well pump house, and other infrastructure. Except for the extraction well and the underground piping from the well house to the treatment system (a distance of approximately 900 feet), all equipment is above-ground and dismantling will not require significant ground disturbance.

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

The Action Area is zoned as "Heavy Industrial – IH."

There are a variety of zoning designations within the Site, including Heavy Industrial (IH), Low Density Residential (R-9), Higher Density Residential District (R-30), Community Commercial (CC), and Park.

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

The Action Area is designated in the comprehensive plan as "Industrial."

There are a variety of Comprehensive Plan designations within the Site, including Industrial, Urban Lower Density Residential, Urban Higher Density Residential, Commercial & Mixed Use, and Open Space.

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

Within the Action Area, there are no shoreline environmental designations pursuant to the Washington State Shoreline Master Program Shoreline Environment Designations as administered by the City of Vancouver and Clark County. Treated groundwater is currently discharged through an existing 36-inch pipe that outfalls to the Columbia River. The outfall is located in an area designated as Urban High Intensity. Upon shutdown of the treatment system, discharge of treated groundwater would cease. The Special Columbia River Management Area is about one mile upstream, and lands with the Urban Conservancy designation are northwest of the Action Area.

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

The City of Vancouver considers the following as critical areas under its critical areas protection ordinance: fish and wildlife habitat conservation areas, wetlands, frequently flooded areas, critical aquifer recharge areas, and geologic hazard areas. Based on Clark County GIS mapping and field confirmation, there are no fish and wildlife habitat conservation areas near or underlying the Action Area. The Clark County Wetland Inventory identifies a stormwater pond wetland located along the western edge of a portion of the existing treated water pipeline. This pond would not be affected by the proposed project. The entire Site and surrounding area is mapped as moderate to high liquefaction hazard. The area is rated "low" earthquake ground motion hazard. The project would not increase the risk of a geologic hazard. The Action Area is located in the immediate proximity of two wellhead protection areas, one public (the Port of Vancouver's wells) and one private (Vanalco). The private well is no longer operating. The existing treated water pipeline crosses the outer edge of the "10 year zone of contribution" mapped for the port's well protection area. This designation implies that should groundwater be contaminated within this zone, that contamination at the wellhead would be expected within 10 years. No contamination from decommissioning the groundwater treatment system is anticipated, and in the event the system is reactivated, no contamination would occur.

The entire Site is underlain by the Troutdale Aquifer, which has been designated as a sole source aquifer by the U.S. Environmental Protection Agency (EPA). The purpose of this designation is to develop programs that reduce the risk of contamination to this potential community supply drinking water aquifer. The previous cleanup action was designed to extract contaminated groundwater from the aquifer and to prevent the risk of its spreading.

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

None, the proposed project would not contain employment or residential uses.

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

No people would be displaced by the proposed project.

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

Mitigation measure are not proposed, as no displacement impacts are anticipated.

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

The proposed project is fully compatible with existing and projected land uses. No additional assurances are necessary.

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

No measures are proposed, as no impacts to agricultural or forest lands of long-term significance are expected.

9. Housing [help]

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

No housing units would be provided by the proposed project.

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

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

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

No housing impacts are anticipated, therefore no measures to reduce or control housing impacts are proposed.

10. Aesthetics [help]

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

No new structures/buildings are proposed. The two existing air strippers are an overall height of about 65 feet and would be removed during treatment system dismantling.

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

Views would be reverted to prior conditions (before implementation of the pump and treatment system) by the eventual removal of the air strippers and other existing structures. No views would be obstructed.

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

No aesthetic impacts anticipated as views would be returned to prior conditions.

11. Light and Glare [help]

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

The proposed project would not produce new light or glare.

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

No new light or glare would be produced by the finished proposed project.

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

Off-site light or glare would not affect the proposed project.

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

No measures are proposed to reduce or control light and glare since impacts are not anticipated.

12. Recreation [help]

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

The Columbia River, located approximately 1,400 feet from the Action Area, provides informal recreational boating and fishing opportunities. The project would not affect recreational boating or fishing opportunities on the Columbia River.

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

The proposed project would not displace any existing 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:

No mitigation measures are proposed because there are no recreation impacts associated with the proposed project.

13. Historic and cultural preservation [help]

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.

The archaeological predictive model for Clark County identifies the Vancouver Lake Lowlands as a high probability area for containing cultural resources.

There are no listed or eligible historic or cultural resources within the Action Area. The area is filled and either developed already or disturbed from the demolition of former buildings. Buildings in the Action Area were constructed during 2008 and 2009

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.

The Site lies within the Vancouver Lakes Archaeological District, recorded as encompassing over 115 archaeological sites; the district was determined eligible for listing in the National Register of Historic Places in 1982. The Vancouver Lake area was a focus of settlement in prehistoric times and continued with Euro-American settlement in the middle and late 1800s. Many archaeological studies have been conducted in areas south and west of Vancouver Lake.

In 2007, during planning for the construction of the pump station and treatment facility, background research was conducted to determine previously recorded cultural resources in the Action Area. The cultural resources assessment included a search of historic maps, aerial photographs, Clark County GIS, and site records and survey reports on file at the Washington Department of Archaeology and Historic Preservation (DAHP). No archaeological sites or historic sites have been recorded in the immediate Action Area. Prior to construction of the pump station and treatment facility, mechanical explorations were completed to the depth of proposed excavations and excavation of certain areas unavailable for sampling prior to construction were monitored during ground disturbing construction activities for the presence of archaeological resources. No evidence of an archaeological site was found. This work is summarized in the following document, Archaeological Investigations Northwest, Inc., Port of Vancouver's Groundwater Pump and Treatment, Summary of Archaeological Review and Subsurface Explorations, October 2009.

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.

The cultural resource work described above was prepared in consultation with the Department of Archaeologic and Historic Preservation (DAHP) and included a search of historic maps, aerial photographs, Clark County GIS, site records and survey reports on file with DAHP, and mechanical excavations of archaeological explorations (test pits) using a backhoe.

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.

Any subsurface disturbance required for dismantling the pump and treatment system's below ground components would occur within soils previously disturbed and studied for installation of the system. The proposed project will be conducted in accordance with the RCW 27.53.060 (Archaeological Sites and Resources) and RCW 27.44.020 (Indian Graves and Records) and all applicable Washington State Department of Archaeology and Historic Preservation (DAHP) regulations. In the event any unknown archaeological or historic materials are encountered during project activities, work in the immediate area of the discovery will be halted and the following actions will be taken: 1) implement reasonable measures to protect the discovery site, including any appropriate stabilization or covering; 2) take reasonable steps to ensure the confidentiality of the discovery site; and 3) take reasonable steps to restrict access to the site of discovery. If human remains are uncovered, appropriate law enforcement agencies shall be notified first, then the steps listed herein will be followed. If remains are determined to be Native American, consultation with the affected tribes will take place in order to mitigate the final disposition of said remains. Should a discovery occur, a professional archaeologist will assess the significance of the find, and DAHP and concerned tribes will be notified so that a course of action can be implemented.

14. Transportation [help]

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.

As shown on Figure 3, the Action Area is accessed via Mill Plain Boulevard (Route 501) and Fourth Plain Boulevard/NW Lower River Road. Access to the facilities would be provided by Saint Francis Lane and other existing interior roads within the port complex.

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?

There is a C-TRAN bus stop on NW Fruit Valley Road and W 27th Street approximately 1,000 feet from the well house location. The overall Site is generally served by C-Tran Line 6. The C-TRAN Current service connector provides on-demand rideshare service to transit users. C-TRAN has established the Port of Vancouver as a key service zone for Current services.

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 would not produce or eliminate any 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 would not require any new transportation facilities, or improvements to existing transportation facilities.

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

The Action Area is in the immediate vicinity of water and rail transportation because the port is located on the lower Columbia River and is served by BNSF Railway Company and Union Pacific Railroad. The treatment plant to be dismantled is located approximately 1,400 feet from the Columbia River, the nearest navigable waterway.

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?

Construction vehicles would access the Action Area during dismantling of the well house and treatment plant to remove equipment and debris. The average amount of vehicular traffic estimated during construction is four round trips per day for up to four months of construction. There would be no measurable increase in truck traffic within the port facility, and traffic on adjacent local streets would not noticeably change.

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 would not interfere with or be affected by the movement of agricultural and forest products in the area.

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

Transportation impacts are not anticipated as a result of the proposed project; therefore, no measures are proposed to reduce or control transportation impacts.

15. Public Services [help]

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 would not create an increase in the need for public services.

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

Because the proposed project would not affect public services, no measures to reduce or control impacts are proposed.

16. Utilities [help]

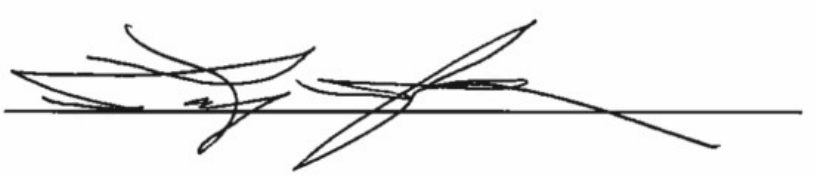
a. Circle (highlight) utilities currently available at the site:
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

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.

No additional utilities are proposed for the project. Electricity service to the treatment plant will be terminated after system dismantling.

C. Signature [HELP]

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: 

Name of signee: Patty Boyden

Position and Agency/Organization: Director of Environmental Services, Port of Vancouver

Date Submitted: January 25, 2023

Date: 9/23/2022 Author: BrethKyl Path: U:\Port\Projects\Clients\1940-Port of Vancouver\275-1940-006-POV TCE\99Svcs\GIS\POV\MXD PDF\2022\Fig 1-1 ProjectArea.mxd

Parametrix

Source: © Mapbox, © OpenStreetMap, Port of Vancouver

0 375 750 1,500 Feet

Figure 1
Project Area

SEPA Checklist
Cadet and Former Swan Sites
Vancouver, Washington

Date: 9/26/2022 Author: BrethKyl Path: U:\Port\Projects\Clients\1940-Port of Vancouver\275-1940-006-POV TCE\99Svcs\GIS\POVMXD PDF\2022\Fig 1-3 SwanAndCadetSitePortionMap.mxd

Parametrix

Source: © Mapbox, © OpenStreetMap, Port of Vancouver

0 250 500 1,000 Feet

- Maximum Extent of HVOC Contamination Prior to Cleanup Actions
- Cadet and Swan Portion of the Site
- SMC Site
- Cadet Facility
- Action Area

Figure 2
Area included in Proposed Project

SEPA Checklist
Cadet and Former Swan Sites
Vancouver, Washington

Date: 9/23/2022 Author: BrethKyl Path: U:\Port\Projects\Clients\1940-Port of Vancouver\275-1940-006-POV TCE\99Svcs\GIS\POV\MXD PDF\2022\Fig4 Floodplains\Fig4 Floodplains.aprx

Parametrix

Source: © Mapbox, © OpenStreetMap, Port of Vancouver

0 125 250 500 Feet

- Pipeline From Well To Treatment Facility
- Treated Water Discharge Pipeline
- Existing Storm Drain
- Existing Stormwater Ponds
- Action Area

Figure 3
Action Area

SEPA Checklist
Cadet and Former Swan Sites
Vancouver, Washington

Date: 9/26/2022 Author: BrethKyl Path: U:\Port\Projects\Clients\1940-Port of Vancouver\275-1940-006-POV TCE\99Svcs\GIS\POV\MXD PDF\2022\Fig4 Floodplains\Fig4 Floodplains.aprx

Parametrix

Source: © Mapbox, © OpenStreetMap, Port of Vancouver

100-year Floodplain
500-yr Floodplain
Taxlots

0 125 250 500 Feet

Figure 4
Floodplains in Project Vicinity

SEPA Checklist
Cadet and Former Swan Sites
Vancouver, Washington