STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Southwest Region Office
PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

STATE ENVIRONMENTAL POLICY ACT
DETERMINATION OF NONSIGNIFICANCE

Date of Issuance: June 11, 2025

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

Agency Contact: Marian Abbett, PE
TCP SWRO Section Manager
Port Angeles Rayonier Mill Site Manager
marian.abbett@ecy.wa.gov
(360) 489-4569

Description of proposal:

The proposed project is implementation of a cleanup action plan for the Rayonier Mill Study Area, a portion of the Port Angeles Rayonier Mill Site. The Port Angeles Rayonier Mill Study Area Interim Action Plan (IAP) (Ecology, February 2025) summarizes the proposed cleanup action for contaminated soil, groundwater, and sediments and provides an explanatory document for public review.

Performance of the remediation project described in the IAP may be briefly summarized as follows:

Sediment Cleanup Action

Remove the in-water treated timbers in contact with marine water or sediment including the approximately 4000 creosote pilings of the dock. Dredge portions of the intertidal, nearshore and shoreline areas. Place a thin-layer cap, clean-fill, and/or amendment over dredged and non-dredged intertidal, nearshore and shoreline areas. All materials to be removed or placed will be lifted using barge-based or land-based equipment. Dredged material (sediment) will be disposed off-site or consolidated and capped on the upland.

Upland Cleanup Action

Contaminated soil will be excavated and restored with clean backfill. Excavated soil will be consolidated and capped. The estimated total amount of soil that will be consolidated or capped in place is 128,000 cubic yards (cy).

To prevent discharge of groundwater contaminants to surface waters, shallow groundwater will be air sparged. The estimated area needing treatment is 35 acres.

Location of proposal:

The former Rayonier Mill facility is located at 700 N. Ennis St., Port Angeles within parts of Township 30N, Range W, Section 2. The Project area is within the Port Angeles Rayonier Mill Study Area.

Applicant/Proponent:

Those entities identified by Ecology as potentially liable parties for the Port Angeles Rayonier Mill Site, i.e., Rayonier A.M. Properties LLC and Rayonier Advanced Materials, Inc., that either agree to perform the remedial action under a forthcoming consent decree or are required to do so by another enforceable document.

Applicant Contact:

Warren Snyder – Environmental Manager
Rayonier A.M. Properties, LLC
1301 Riverplace Blvd.
Jacksonville, FL 32207
(904) 357-3768
warren.snyder@ryam.com

Determination:

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, the Consent Decree and the Draft Interim Action Plan.

These documents are available at:

Port Angeles Public Library 2210 South Peabody Street Port Angeles, WA 98362 360-417-8500	Ecology Lacey Office (by appointment) 300 Desmond Drive SE Lacey, WA 98503 PublicDisclosureSWRO@ecy.wa.gov 360-407-6365

The documents are also available at: **https://apps.ecology.wa.gov/cleanupsearch/site/2270.**

This determination is based on the following findings and conclusions:

Sediment Cleanup Action

- The purpose of this project is to protect human health and the environment by addressing concentrations of metals, dioxin and furans, polychlorinated biphenyls (PCBs), and

carcinogenic polycyclic aromatic hydrocarbons (cPAHs), in surface intertidal and subtidal sediments within the Rayonier Mill Study Area portion of Port Angeles Harbor. As such, it is intended to significantly improve, rather than adversely impact, environmental conditions.

- The project will achieve sediment cleanup levels by excavating or dredging sediment, or applying enhanced monitored natural recover (EMNR) layers to reduce sediment contamination.
- EMNR layers will be applied in thin layers to minimize impacts to sensitive habitats.
- The need for and amount of mitigation will be confirmed in consultation with the United States Army Corps of Engineers (USACE) after the design for cleanup action has been developed.
- The total cleanup remedy is anticipated to result in no net loss of aquatic habitat area or function.
- Engineering design documents will be reviewed and approved by Ecology to ensure all on-site work will be performed in accordance with applicable standards and use best management construction practices.
- In-water cleanup actions will be performed in accordance with Ecology approvals and permit conditions. Compliance with surface water quality (e.g., turbidity) criteria will be verified through monitoring as specified by permit conditions.
- Imported fill material necessary to complete the Project will be clean and obtained from an Ecology-approved source. Contractors will be required to have a plan in place to safeguard against unintentional releases of fuel, lubricants, or hydraulic fluid from construction equipment.
- Shoreline excavation and filling will occur “in the dry” during low tidal cycles to the extent practicable to reduce in-water work.
- As part of its Nationwide Permit (NWP) 38 determinations, the Corps will consult with the Lower Elwha Klallam Tribe (LEKT) regarding treaty rights and (under NHPA Section 106) cultural and archaeological resources and will consult with federal services and LEKT to ensure that impacts to Endangered Species Act listed species and critical habitat are minimized. The NWP 38 will be issued with both standard and project-specific conditions that will inform the final design.
- The Ecology cleanup project manager or a contractor hired by Ecology will provide oversight during project construction.
- Best management practices will be used to reduce or mitigate impacts associated with construction, such as equipment noise and lights, construction traffic, inadvertent petroleum leaks and spills, diesel equipment emissions, etc.

- Per the Washington Administrative Code (WAC) 173-340 Adopted Rule dated August 23, 2023, Inadvertent Discovery Plans (IDPs) are now required for all remedial actions. An IDP will be prepared per the WAC-173-340-815 3.b.ii and followed during all ground-disturbing activities during construction. Additionally, Ecology-led consultation with the Department of Archaeology and Historic Preservation (DAHP) and potentially affected Indian tribes must occur prior to all remedial actions to assess any potential effects these actions may have on cultural resources. Based on consultations, a cultural resources plan, such as a survey or monitoring plan may be required. Project remedial actions must comply with applicable state and federal laws outlined in WAC 173-340-815 Cultural resource protection.
- The project will preserve future habitat restoration opportunities.

Upland Cleanup Action

- The purpose of this project is to protect human health and the environment by addressing concentrations of metals, dioxin and furans, polychlorinated biphenyls (PCBs), carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and total petroleum hydrocarbons (TPH) in soil and groundwater within the Rayonier Mill Study Area portion of Port Angeles Harbor. As such it is intended to significantly improve, rather than adversely impact environmental conditions.
- The project will achieve soil cleanup levels by excavating contaminated soil and consolidating the soil in the west mill area under a 2-foot-thick cap of clean soil. In addition, groundwater cleanup levels will be achieved through air sparging to affect the redox conditions in groundwater, resulting in oxidation of ammonia to nitrite/nitrate, oxidation of metals to form precipitates, and promoting aerobic biodegradation of dissolved organic contaminants.
- Surface water runoff will be managed using Best Management Practices (BMPs) as appropriate, and consistent with Ecology's 2019 *Stormwater Management Manual for Western Washington*. Collection and disposal of stormwater runoff is not proposed. Compliance with the conditions outlined in the issued National Pollutant Discharge Elimination System (NPDES) construction stormwater general permit will be maintained during construction. BMPs will minimize runoff from contaminated sediment and soil stockpiles as well as clean sand and gravel fill material stockpiles.
- Silt fencing, wattles, erosion control mats and other erosion control measures will be used during construction to manage erosion. BMPs and proper erosion controls will be implemented consistent with the Construction Monitoring Plan to be developed and approved by Ecology. These measures will limit potential erosion associated with the Project.
- Engineering design documents will be reviewed and approved by Ecology to ensure all on-site work will be performed in accordance with applicable standards and use of best management construction practices.

- Imported fill material necessary to complete the Project will be clean and obtained from an Ecology-approved source. Contractors will be required to have a plan in place to safeguard against unintentional releases of fuel, lubricants, or hydraulic fluid from construction equipment.
- The Ecology cleanup project manager or a contractor hired by Ecology will provide oversight during project construction.
- Best management practices will be used to reduce or mitigate impacts associated with construction, such as equipment noise and lights, construction traffic, inadvertent petroleum leaks and spills, diesel equipment emissions, etc. Dust control measures will be implemented.
- Per the Washington Administrative Code (WAC) 173-340 Adopted Rule dated August 23, 2023, Inadvertent Discovery Plans (IDPs) are now required for all remedial actions. An IDP will be prepared per the WAC-173-340-815 3.b.ii and followed during all ground-disturbing activities during construction. Additionally, Ecology-led consultation with the Department of Archaeology and Historic Preservation (DAHP) and potentially affected Indian tribes must occur prior to all remedial actions to assess any potential effects these actions may have on cultural resources. Based on consultations, a cultural resources plan, such as a survey or monitoring plan may be required. Project remedial actions must comply with applicable state and federal laws outlined in WAC 173-340-815 Cultural resource protection.
- The project will preserve future habitat restoration opportunities.
- The engineering design will include evaluation of and adaptation to reduce potential impacts from climate change and sea level rise with inclusion of green remediation best management practices and institutional control language.

Comment Period:

This DNS is issued under WAC 197-11-340. The comment period for this DNS corresponds with the comment period on the Environmental Checklist, the Consent Decree and the Draft Interim Action Plan. All comments received between June 12, 2025, 8:00 a.m. to August 12, 11:59 p.m. will be considered.

Please submit written comments:

Online (preferred): https://go.ecology.wa.gov/comment2270

Or by mail or email:

Marian Abbett
Port Angeles Rayonier Mill Site Manager
Washington State Department of Ecology
PO Box 47775
Olympia, WA 98504-7775
marian.abbett@ecy.wa.gov

Responsible Official:

Marian L Abbett, PE
Section Manager
Toxics Cleanup Program
Southwest Region Office
Department of Ecology
PO Box 47775
Olympia, WA 98504-7600
360-489-4569
marian.abbett@ecy.wa.gov

Signature: Marian L. Abbett _____

Marian L. Abbett, PE

Date: June 11, 2025 _____

SEPA[1] 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-

[1] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance

projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

A.Background

Find help answering background questions[2]

1. **Name of proposed project, if applicable:**

   Rayonier Mill Study Area Remedial Actions, Former Rayonier Port Angeles Mill Site (Project)

2. **Name of applicant:**

   Rayonier A.M. Properties, LLC

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

   1301 Riverplace Blvd., Jacksonville, FL 32207 attn: Warren Snyder
   904-357-3768
   Warren.snyder@ryam.com

4. **Date checklist prepared:**

   October 23, 2024; revised January 9, 2025 and updated May 27, 2025

5. **Agency requesting checklist:**

   Washington State Department of Ecology (Ecology)

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

   January 2026 to December 2027, possibly extending into 2030 if additional in-water work windows are needed based on final construction schedule.

   As described in the Draft Interim Action Plan (IAP), the overall time to design, permit, contract and construct the remedy is expected to take no more than 10 years. The project schedule will be refined during remedial design and permitting. The applicant-selected contractors will make additional adjustments to determine the final construction sequencing and duration taking into account regulatory permit conditions and subject to Ecology approval.

   In-water work will be timed to occur within approved in-water work windows to prevent impacts to salmonids. In-water construction is normally not permitted in the Harbor during the period from February 16 through July 14 of any year unless otherwise allowed by applicable regulatory agencies. The in-water work window for the Harbor typically occurs from July 15 through February 15. Additional in-water work restrictions may apply. Refinements to the implementation of in-water work windows aimed at safeguarding forage fish and juvenile salmonids, while also accommodating fishing and other harvesting activities, as well as potential tribal events, will be further developed during remedial design and permitting. The overall

[2] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background

schedule for the Project will be adjusted to accommodate any reductions in work windows required by the regulatory agencies and tribes.

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

There are currently no plans for future additions, expansions, or further activity related to or connected with this proposal.

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

- *Former Rayonier Mill in Port Angeles, Interim Action Plan, Department of Ecology, 2025.*
- *Former Rayonier Mill in Port Angeles, Upland Data Summary Report, GeoEngineers, 2021.*
- *Former Rayonier Mill in Port Angeles, Marine Data Summary Report, Windward, 2021.*
- *Port Angeles Rayonier Mill Study Area, Alternatives Evaluation, Tetra Tech, 2021.*
- *Archaeological Monitoring and Inadvertent Discovery Plan, Historical Research Associates, 2019.*

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 applications are pending for governmental approvals of other proposals directly affecting the Project. Cleanup of the Western Port Angeles Harbor Sediment Cleanup Unit is being addressed under a separate process with Ecology (Figure 1).

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

State

- Clean Water Act (CWA) Section 401 Water Quality Certification (WAC 173.201A and 173.225)
- National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Permit (Individual or General)
- Aquatic Use Authorization or Easement – Washington State Department of Natural Resources (DNR)

Federal

- U.S. Army Corps of Engineers (USACE) Section 10 Permit (33 United States Code [USC] 403), Section 408 review (33 USC 408), and USACE Section 404 Review (33 USC 1344), under Nationwide Permit 38: Cleanup of Hazardous and Toxic Waste
- U.S. Coast Guard Private Aids to Navigation (14 USC 81)
- Endangered Species Act (ESA) Section 7 Consultation (16 USC 1531–1543)
- Magnuson-Stevens Fishery Conservation and Management Act Evaluation (16 USC 1801–1884)
- Marine Mammal Protection Act (MMPA) compliance (16 USC 1361–1407)
- National Historic Preservation Act Section 106 Compliance (16 USC 470f)

Since the Project will be conducted under a Consent Decree (CD) with Ecology, the following approvals are exempt from procedural requirements of certain Washington state laws and regulations and all local permits:

Local

- Archaeological pre-determination or resource survey (City of Port Angeles [City])
- Critical areas compliance (City)
- Shoreline Management Compliance (City)
- Industrial Wastewater Discharge (City)
- Clearing, Grading, Filling, and Drainage Requirements (City)

State

- Hydraulic Project Approval (HPA) (RCW Chapter 77.55 and WAC 220.110)
- Coastal Zone Management Act Consistency Determination (Ecology)

The Project must adhere to the substantive requirements outlined in these laws and regulations. Ecology will provide an opportunity for public comment, as well as input from the state agencies and local governments responsible for enforcing these laws.

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.)

Performance of remediation project described in Draft Interim Action Plan (IAP), which may be briefly summarized as follows:

Sediment Cleanup Action

Remove the in-water treated timbers in contact with marine water or sediment including the approximately 4000 pilings. Dredge portions of the intertidal, nearshore and shoreline areas. Place a thin-layer cap, clean-fill, and/or amendment over dredged and non-dredged intertidal, nearshore and shoreline areas. All materials to be removed or placed will be lifted using barge-based or land-based equipment. Materials removed will be transported for re-use or off-site disposal.

Upland Soil Remediation

Contaminated soil will be excavated and restored with clean backfill. Excavated soil will be consolidated and capped. The estimated total amount of soil that will be consolidated or capped in place is 128,000 cubic yards (cy).

Groundwater Cleanup Action

To prevent discharge of groundwater contaminants to surface waters, shallow groundwater will be air sparged. The estimated area needing treatment is 35 acres.

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.

700 N. Ennis St., Port Angeles, WA

Township 30N, Range W, Section 2

The Project area is within the Port Angeles Rayonier Mill Study Area as shown in Figure 1-1.

See attached Figures 6-2, 6-3, and 6-4 from the dIAP.

B.Environmental Elements

1. Earth

Find help answering earth questions[3]

a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

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

Approximately 70 percent along the bluffs south of the Olympic Trail which generally abut the site. The majority of the site is relatively flat.

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.

Beach soils and sandy sediment are present along the shoreline and around the pilings. Upland soils are predominantly fine or very fine sand with trace amounts of silt and clay.

The Soil Survey of Clallam County Area (Halloin, 1987) indicates soils typically found on the site include Dystric Xerorthents, extremely steep; Beaches; Neilton very gravelly loamy sand, 30 to 70 percent slopes; and Puget silt loam. Adjacent to the site are the Clallam-Hoypus gravelly sandy loams, 0 to 15 percent slopes.

The Dystric Xerorthents, extremely steep soils, are very deep, well-drained, and occur on coastal bluffs. Permeability is moderately rapid, available water capacity is moderate, runoff is medium to rapid, and water erosion hazard is severe.

Beach soils occur in narrow strips at the north end of the site. These soils are typically subject to tidal wave action.

Neilton very gravelly loamy sand, 30 to 70 percent slopes, are very deep, excessively drained soils found on terrace escarpments that formed in glacial outwash. Permeability is very rapid, available water capacity is low, runoff is slow, and water erosion hazard is severe.

[3] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth

Puget silt loams are very deep, poorly drained soils found on low terraces and flood plains. Permeability of this unit is moderately slow and available water capacity is high. Runoff is medium and water erosion hazard is slight.

The Clallam-Hoypus gravelly sandy loams, 0 to 15 percent slopes occur immediately south of the project site, at the top of the steep bluffs. This soil unit likely influences the physical characteristics of the site associated with the bluff areas. The Clallam soil is moderately deep and moderately well drained and formed in glacial till. The Hoypus soil is very deep and somewhat excessively drained and formed in glacial outwash.

Soils in portions of the project area have been disturbed during the installation of the rail line, and in the construction and operation of the Rayonier pulp mill. These disturbances are focused along the shoreline, and typically consist of the placement of fill as a base for the railroad and mill operation.

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

There is existing riprap on the shoreline which protects against erosion.

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.

Contaminated soil in the City Purchase Area, Ennis Creek restoration area and east and west of the creek will be excavated and placed under a 2-foot-thick cap of clean soil in the west mill area or disposed at an appropriate disposal facility. In most areas, shallow excavation of 1 foot or less will likely be sufficient. The current estimate of impacted soil to be excavated and consolidated under the cap is approximately 55,000 cubic yards (cy). This includes 28,200 cy of stockpile soil currently on site and 27,000 cy excavated outside of the capped area. The estimated total amount of soil that will be consolidated or capped in place is 128,000 cy. The capped area will be setback from the existing shoreline a minimum of 200 feet landward from existing MHHW. The capped area will be approximately 10 acres in the west mill area. Excavated areas will be restored with clean sourced backfill.

In addition, approximately 20,200 cy of contaminated sediments will be dredged from the marine portion of the Study Area. (This volume is an estimate and subject to revision after pre-design sampling, as are all volumes of dredged material.) This dredged material will be dewatered and sent off-site for disposal or placed in the west mill area under the cap to be determined in the remedial design.

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

g. Removal and consolidation of soil and placement of backfill will disturb existing vegetation and can cause erosion. Upland equipment such as cranes for removal of nearshore pilings/dock timbers and stacked concrete panels will also disturb existing vegetation. **About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

No change in current conditions.

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

Silt fencing, wattles, erosion control mats and other erosion control measures will be used during construction to manage erosion. Best Management Practices (BMPs) and proper erosion controls will be implemented consistent with the Construction Monitoring Plan to be developed and approved by Ecology. These measures will limit potential erosion associated with the Project.

2. Air

Find help answering air questions[4]

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.

b. The project will require heavy equipment including trucks, excavators, bulldozers and tugboats with diesel or gasoline engines. These emissions will be temporary in nature and generally of short duration. Fugitive dust could be generated during dry periods during construction. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

There are no known off-site sources of air emissions that would affect the Project.

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

The contractor will be required to comply with federal, state and local air quality laws. Dust control measures will be implemented. The project will use locally-sourced materials, which will minimize greenhouse gas emissions. No long-term adverse effects on local air quality are anticipated.

3. Water

Find help answering water questions[5]

a. Surface:

Find help answering surface water questions[6]

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

[4] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air
[5] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water
[6] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water

yes, describe type and provide names. If appropriate, state what stream or river it flows into.

The Project is located within the eastern portion of Port Angeles Harbor and includes the intertidal and shallow submerged lands offshore west of the former Rayonier mill known as the log pond; the estuary and shallow water environment offshore of Ennis Creek; and an area offshore of the eastside of the mill.. Ennis Creek runs through the project limits. Ennis Creek flows into the harbor and the harbor is connected to the Strait of Juan de Fuca. White Creek, a major left-bank tributary, enters Ennis Creek at river mile (RM) 0.30, south of the project limits. . See Figure 1-1.

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.**

   Yes. See attached figures 6-2, 6-4, and 6-5 from the IAP for detail.

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.**

   Contaminated sediment from the intertidal and nearshore portion of the site will be dredged and filled. Previously dredged berth and approach areas will be filled to surrounding substrate depth gradient or an appropriately stable elevation as determined by Ecology based on modeling conducted as part of the remedial design To enhance monitored natural recovery, a thin layer of clean sediment will be placed in dredged areas not backfilled as described above. Volume TBD in design. This will be imported from local vendors.

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

   No surface water withdrawals or diversions are proposed.

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

   See attached map.

   The Project area is located within the 100-year floodplain (FEMA 1990; FIRM 530023 0005 C). The Project is in the marine environment of the Harbor.

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.**

   During construction, incidental quantities of waste materials (including diesel fuel and lubricating oils) from accidental leakage from heavy equipment and vehicles could enter surface waters. Contaminated sediment may be resuspended during dredging or excavation of nearshore, intertidal and shoreline areas. BMPs will be in place in the event of a spill or release, and to minimize contaminated sediment from releasing to surface water during transfer. A Construction Monitoring Plan will be developed to specify BMPs

to minimize turbidity impacts and water quality monitoring required during construction activities. No waste materials would be discharged to ground or surface water from the completed Project.

b. Ground:

Find help answering ground water questions[7]

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 a general description, purpose, and approximate quantities if known.**

   Groundwater contamination will be treated through air sparging. It is currently estimated that 35 acres will need treatment, but that will be refined during remedial design. Groundwater monitoring wells will be installed and monitored. The quantity of groundwater withdrawn will be small, only for the purpose of sampling. Purge water and sampling water will be contained in drums and disposed of appropriately, such as at a municipally owned treatment facility.

2. **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (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 will be discharged into the ground.

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.**

   Stormwater currently infiltrates or runs off the property into the harbor or Ennis Creek. Temporary changes to infiltration and stormwater runoff patterns may occur during construction. Surface water runoff will be managed using BMPs as appropriate, and consistent with Ecology's 2019 *Stormwater Management Manual for Western Washington*. Collection and disposal of stormwater runoff is not proposed. Compliance with the conditions outlined in the issued NPDES construction stormwater general permit will be maintained during construction. BMPs will minimize runoff from contaminated sediment and soil stockpiles as well as clean sand and gravel fill material stockpiles.

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

   Dock materials will be lifted by barge-mounted cranes and placed into transport barges. Nearshore sections may be removed using similar land based equipment. No materials will be allowed to fall into surface water.

[7] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater

During construction, incidental quantities of waste materials (including diesel fuel and lubricating oils) from accidental leakage from heavy equipment and vehicles could enter surface waters. The contractor would be required to implement BMPs, environmental plans, and monitoring to minimize the potential for waste materials to enter surface water. The contractor would provide and implement conservation measures, including SPCC and TESC Plans. No waste materials will be discharged to ground or surface water from the completed Project.

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

   The Project will not affect drainage patterns or water circulation in the vicinity of the Project.

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

Temporary erosion controls will be used during construction.

In-water cleanup actions will be performed in accordance with Ecology approvals and permit conditions. Compliance with surface water quality (e.g., turbidity) criteria will be verified through monitoring as specified by permit conditions.

Imported fill material necessary to complete the Project will be clean and obtained from an Ecology-approved source. Contractors will be required to have a plan in place to safeguard against unintentional releases of fuel, lubricants, or hydraulic fluid from construction equipment.

Shoreline excavation and filling will occur "in the dry" during low tidal cycles to the extent practicable to reduce in-water work.

4. Plants

Find help answering plants questions

a. Check the 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**

☐ **orchards, vineyards, or other permanent crops.**

☐ **wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**

☒ **water plants: water lily, eelgrass, milfoil, other**

☒ **other types of vegetation**

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

There is no vegetation on the dock beams and piling. Upland excavation will disturb shrubs, trees, water plants, and grass in areas of contaminated soil excavation and consolidation. The area of anticipated upland disturbance is shown in Figure 6-2 of the dIAP.

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

d. Chinook, Coho, Chum, and Pink Salmon; Steelhead,; Southern Eulachon; Great blue heron; Bald Eagle. Cavity nesting ducks; Barrow's goldeneye, common goldeneye, bufflehead, and hooded merganser. **Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.**

The preservation of significant trees will be factored into the design. In addition, the following measures will be incorporated into the project to preserve or enhance vegetation at the site.

•Clearly mark trees and vegetation to remain prior to site clearing

e. •Develop a mitigation plan in accordance with Port Angeles Municipal Code (PAMC) Chapter 15.20, Environmentally Sensitive Areas Protection and Chapter 15.24, Wetlands Protection to mitigate for impacts to wetlands and wetland stream buffers.**List all noxious weeds and invasive species known to be on or near the site.**

The majority of the area consists of impervious surface or extremely compacted fill material with early successional species adapted to the poor soils and low water availability. More hospitable areas are largely colonized by Himalayan blackberry. English ivy, knotweed, and reed canarygrass are other invasives that have been observed at the site.

5. Animals

Find help answering animal questions[8]

- **List any birds and other animals that 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:**

  More than 60 species of marine fish have been observed in the Harbor (Shea et al. 1981). Salmon, bottomfish, and forage fish in the area are important for sport, commercial, and tribal harvests.

  The important bottomfish species for commercial, tribal, or sport fishing within the Harbor include lingcod, Pacific halibut, spiny dogfish, Pacific cod, rockfish, English sole, Dover sole, rock sole, starry flounder, sanddab, and perch (Shea et al. 1981). According to the

[8] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals

Washington State Fish and Wildlife (WDFW) *Forage Fish Spawning Map* (Forage Fish Spawning Map - Washington State (arcgis.com)), no documented herring spawning areas occur in the Harbor. Smelt spawning occurs in approximately the inner half of Ediz Hook, one small sand lance spawning area is located in the inner harbor adjacent to McKinley Paper Company, and one small sand lance spawning area is present in the vicinity of Harborview Park, located on the end of Ediz Hook (WDFW 2024a).

A variety of shellfish are present in the Harbor. Shellfish harvest along a majority of the Harbor shoreline are often closed due to pollution such as bacterial contamination and stormwater runoff, algal blooms, and biotoxin contamination.

The Ediz Hook Reservation for Native Birds within the Harbor and the Dungeness Wildlife Refuge in the Dungeness County Park, located approximately 12 miles from the Harbor, provide important habitat for wintering and migrating birds. The sheltered waters along Ediz Hook support wintering populations of Great blue herons, Barrow's goldeneye, Western grebe, Common goldeneyes, and Harlequin ducks (Audubon 2024). Species observed year-round include Cormorants, Alcids, Sea gulls, and Sea ducks. The Harbor also supports populations of Heermann's gulls, Thayer's gulls, Common loon, and Common murre (Audubon 2024). Shorebirds observed in the Dungeness National Wildlife Refuge (DNWF) that are likely to be present along Ediz Hook include the American wigeon, Black oystercatcher, Harlequin duck, Sanderling, Dunlin, Least sandpiper, Pigeon Guillemot, Bald eagle, and Snowy owl. Marine mammals observed in the DNWF include Habor seal, Southern Resident Killer whale (SRKW), Bigg's killer whales (transients), and Northern elephant seal. Other terrestrial mammals observed include Douglas's squirrel and Black-Tailed deer.(USFWS 2024a) The Audubon-designated Port Angeles "Important Bird Area" for the threatened and endangered marbled murrelets is present within the Harbor (Audubon 2024). The nearest known occupied nesting stands are located approximately 6 miles south of the Harbor in the Olympic National Forest (Malcom Pirnie 2007. Brown pelicans have been observed in the Strait of Juan de Fuca and Puget Sound (WDFW 2022).

A total of 20 species of marine mammals are found in Puget Sound and the Strait of Juan de Fuca (NOAA 1979). These include the California Sea lion, Northern (Steller) Sea lion, Pacific harbor seal, Northern elephant seal, and the Northern fur seal (NOAA 1979). Cetaceans include the Gray whale, Minke whale, Fin whale, Humpback whale, Risso's dolphin or Whitehead grampus, Pacific white-sided dolphin, Short-beaked or Saddleback dolphin, False killer whale, Shortfin pilot whale, Pygmy sperm whale, Cuvier's beaked whale or the Goose-beaked whale, Baird's beaked whale or North Pacific giant bottlenose whale, Orca, Dall's porpoise, and harbor porpoise (NOAA 1979). Short-beaked dolphins, which generally occupy warmer water, were sighted near Port Angeles for the first time in the summer of 2016 (Lee 2016). According to a local whale watching group, species commonly seen near Port Angeles include SRKWs and Bigg's, Minke whales, Humpback whales, Gray whales, Steller sea lions, Elephant seals, Harbor seals, Dall's porpoises, and Harbor porpoises (Puget Sound Express 2024). River otters are commonly observed in the Harbor (WDFW 2024b).

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

Chinook, Coho, Chum, and Pink Salmon; Steelhead,; Southern Eulachon; Great blue heron; Bald Eagle. Cavity nesting ducks; Barrow's goldeneye, common goldeneye, bufflehead, and hooded merganser.

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

  The site is within the Pacific Flyway.

  Juvenile salmonids migrate along the nearshore areas of Port Angeles.

- **Proposed measures to preserve or enhance wildlife, if any.**

  Removal of the dock beams and creosote-treated timber piles will improve the aquatic habitat quality at the site.

  The Project will result in a net decrease in bioaccumulative contaminant exposure to wildlife. Adherence with the substantive provisions of federal, state, and local regulations will also be protective of wildlife in the Project vicinity, including the following:

  - Shoreline Management Act/City Shoreline Master Program
  - Washington State Hydraulic Code
  - ESA
  - Magnuson-Stevens Fishery Conservation and Management Act
  - MMPA
  - Migratory Bird Treaty Act
  - Clean Water Act Section 404

  In-water work windows and Project BMPs, including monitoring during in-water construction, will be implemented to protect forage fish and juvenile salmonids. The in-water work window typically occurs between July 16 and January 14. Specific timing will be coordinated with WDFW and the Lower Elwha Klallam Tribe (LEKT). The applicant and Ecology will work with the LEKT to determine if further reductions to in-water work windows would be required to accommodate fishing and other harvesting activities (e.g., shellfish), as well as tribal events.

  In addition, standard erosion control measures and BMPs would be implemented to avoid erosion and sedimentation impacts. Using properly implemented and appropriate erosion controls and BMPs, short-term impacts on fish habitat should be minor. Construction would be required to meet the most recent version of Ecology's Stormwater Management Manual for Western Washington and City erosion control requirements. All wetland and stream buffers would be restored as described in Section 4 above.

  A monitoring plan will be developed for the Project consisting of 1) monitoring during in-water construction; 2) monitoring immediately following in-water construction; and 3) long-term monitoring of chemical and biological conditions. The monitoring period outlined in the CD will be adhered to, and maintenance plan(s) will be developed if monitoring indicates that maintenance is required.

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

  Invasive fish, mollusks, and European green crab are known to be present in the Harbor (WDFW 2024d). No invasive terrestrial animal species are known to be on and/or near the Project area.

6. Energy and natural resources

Find help answering energy and natural resource questions[9]

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.

The Project will require fossil fuels (diesel, gas) and electricity to operate heavy machinery and vessels, and to light the site for safety. Once completed, the Project will not create any long-term energy needs.

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

The completed Project will not affect the potential use of solar energy.

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.

No energy impacts are related to the completed project.

Construction practices that encourage energy efficient use, such as limiting idling equipment, encouraging carpooling of construction workers, and locating staging areas near work areas, will be implemented.

7. Environmental health

Health Find help with answering environmental health questions[10]

a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.

All contaminated excavated materials will be appropriately disposed of at a Subtitle D landfill, or, placed beneath the cap on the uplands or, subject to further remedial design characterization and as approved by Ecology, suitable excavated sediment and nearshore soils that meet upland cleanup levels may be beneficially reused locally or regionally, as appropriate. Before disposal or reuse, these materials may be temporarily stockpiled. BMPs will minimize runoff from contaminated sediment and nearshore soil stockpiles and prevent airborne dust. Potential environmental health hazards stemming from a spill of fuel or oil from operating equipment or equipment accidents will be addressed immediately. These hazards will be mitigated through adherence to Project construction plans, including the SPCC plan, as well as Health and Safety Plans.

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

The former Rayonier mill site has undergone several investigations since mill closed in 1997. Hazardous substances in the Rayonier Mill Study Area include carcinogenic

[9] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou
[10] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health

polyaromatic hydrocarbons (cPAHs), polychlorinated biphenyls (PCBs), dioxins/furans, and metals. These hazardous substances have the potential to pose risks to both human health and the environment. Planning for future remedial actions under WA Model Toxics Contract Act is in progress.

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

   The sediment under and around the dock contains chemical contaminants at concentrations above WA sediment management standards. Upland soils and groundwater exceed established cleanup levels.

   The Project's cleanup actions will result in a significant reduction in contaminant toxicity to both human and ecological receptors. In the marine portion of the Study Area, this will be achieved through a combination of excavation, dredging, capping, and EMNR that interrupt the pathways for exposure to the remaining contamination within the sediment cleanup unit while also minimizing the mobility of contaminants left in place.

   In the upland portion of the Study Area, this will be achieved through consolidating and capping contaminated soil in the west mill area and using air-sparging to affect the redox conditions in groundwater, resulting in oxidation of ammonia to nitrite/nitrate, oxidation of metals to form precipitates, and promoting aerobic biodegradation of dissolved organic contaminants.

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.**

   No hazardous chemicals will be used or produced during remediation. Hazardous chemicals may be used for equipment maintenance and these will be contained on the work barges or tugboats or secured upland areas.

4. **Describe special emergency services that might be required.**

   Emergency services might be required for construction workers in case of accident during remediation.

5. **Proposed measures to reduce or control environmental health hazards, if any.**

   Materials removed from the dock will be placed into transport barges for off-site disposal. Contaminated upland soils and dredged or excavated contaminated sediments will be consolidated and capped or disposed of off-site.

   Hazards will be limited to those encountered during construction. Workers will be properly trained for work at the Project; proper construction methods, personal protective equipment, and safety equipment will be employed.

Environmental health hazards that could result from a spill of fuel or oil from operating equipment will be addressed within the Construction Monitoring Plan prepared as part of the Project.

b. Noise

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

There are no existing sources of noise that would effect the proposed work.

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)?

Sources of noise would be from common construction equipment. Work would be done during normal work hours. Construction will be completed consistent with applicable state and local regulations.

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

All construction equipment would be properly maintained.

Construction would be done during normal work hours.

8. Land and shoreline use

Find help answering land and shoreline use questions[11]

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 upland site is vacant and not being used.

The majority of the Upland Study Area is currently zoned Heavy Industrial, except for the 200-foot wide buffer that is zoned for Mixed Use in the west to central portion and zoned Urban Conservancy Recreation in the eastern portion under the City's Shoreline Master Program. Areas south of the footprint of the historical industrial activities are zoned for non-industrial uses. The largest of these is zoned Public Buildings and Parks. Smaller portions of the Upland Study Area are zoned Light Industrial, Commercial Arterial, and Residential Single Family.

Much of the Upland Study Area contains remnant building foundations and support pilings. Soil from the excavation and installation of the City's combined sewer overflow (CSO) project is stockpiled to the west of Ennis Creek. Much of the area west of Ennis Creek is covered with several feet of crushed concrete.

[11] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use

The Olympic Discovery Trail, a pedestrian and bicycle pathway constructed along the former Seattle and North Coast Railroad right-of-way, is located at the foot of the bluff in the southern portion of the Upland Study Area. The Trail is located on an access easement granted to the City by Rayonier Properties LLC. The pedestrian/bicycle pathway is separated from the majority of the Upland Study Area by a fence; it includes a bridge that crosses Ennis Creek near the northeastern corner of the former mill parking lot.

A municipal wastewater treatment plant owned by the City is located east of, and adjacent to, the southern portion of the Upland Study Area. In 2011, the City purchased a portion of the Upland Study Area immediately northwest of the wastewater treatment plant. An easement for a new sanitary sewer pipeline that connects to the City's wastewater treatment system was granted to the City by Rayonier Properties LLC.

The Marine Study Area includes a dock and a jetty on land owned by the Washington State Department of Natural Resources (DNR) and leased to Rayonier, Inc (lease agreement now managed by RAMP). The dock extends north into Port Angeles Harbor and is constructed with treated timbers and pilings. The jetty is constructed of rock, pilings, and timbers and extends northwest into the harbor from the northwestern corner of the property. RAMP began deconstructing the dock in 2020 by removing the warehouse structure located on the dock and the majority of the concrete deck panels.

Impacts to nearby or adjacent property owners and measures to address impacts will be considered during the design process as appropriate and include consultation with the Lower Elwha Klallam Tribe.

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 because 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 industrial comprehensive plan and zoning designation of the site and adjacent lands have been in place for over 50 years, and there is no recent history of agricultural use on the site.

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 Project will not affect any working farm or forest operations.

c. Describe any structures on the site.

The existing structures at the site include:

•Three remaining above ground tanks in the former west process area plus a large tank and smaller buildings in the City-owned purchase area

A timber crib rock jetty approximately 700 feet long and 30 feet wide with approximately 375 creosote timber piling.

•Dock - Large dock – Creosote piling supported creosote timber dock approximately 1050' long and 250' wide (~5.7 acres of overwater coverage), over 4,300 creosote timber pilings, ~3,000 square feet concrete foundation. The former warehouse structure on the dock has been removed. The dock decking has been removed.

•Foundation – Large Foundation and Supporting Piling and Foundations etc. - Approximately 240' x 165', several hundred piling (exact number unknown).

•Breakwater – Creosoted Timber Piling Breakwater. Approximately 400 feet long, including ~400 creosote piling.

•Bridge - Trestle Bridge across Ennis Creek. Approximately 120 feet long by 14 feet wide bridge across Ennis Creek (~1,680 square feet total, 0.026 acres of overwater coverage). Creosoted timber decking and beams, concrete foundations. (partially removed)

•Small Foundation - Concrete Foundation at Ennis Creek. Approximately 110' x 65' total (0.02 acres of overwater coverage) concrete foundation that is adjacent to and spans Ennis Creek.

Will any structures be demolished? If so, what?

Yes, portions of the dock, jetty, breakwater, bridge, and small foundation are likely to be removed as part of remediation.

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

Heavy Industrial

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

High-Intensity Mixed Use

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

High-Intensity Mixed Use and Urban Conservancy -Recreational.

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

Per Title 15 Environment, Chapter 15.20.01 Environmentally Sensitive Areas Protection of the Port Angeles Municipal Code (PAMC). The Harbor is a fish and wildlife habitat conservation area and habitat of local importance for migrating fish and wildlife. Historical use in the area has degraded the available marine habitat. Generally, cleanup actions will improve habitat functions compared to existing conditions.

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

None

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

None.

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

Not applicable (NA)

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

NA

The Project will comply with the substantive requirements of the Port Angeles Municipal Code and the City Shoreline Master Plan, which includes standards to ensure appropriate use and protection of properties near the shorelines of the state.

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

NA

The Project will not affect agricultural and forest lands of long-term commercial significance; therefore, no measures are proposed.

9. Housing

Find help answering housing questions[12]

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

None

No housing units will be provided by the Project.

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

None

The Project will not eliminate any housing units.

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

[12] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing

The Project will not displace any housing units, and no measures are required.

10. Aesthetics

Find help answering aesthetics questions[13]

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

No structures proposed. Existing dock, largest remaining structure onsite, will be removed.

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

Dock removal will improve views of shoreline. Soil capping will be well below the height of the adjacent bluff but may partially obstruct views from a City trail easement that crosses the upland side of the project area.

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

NA Removal of the deteriorating structures will remove industrial remnants of the former mill. Final configuration will adhere to permitting and ARAR requirements.

11. Light and glare

Find help answering light and glare questions[14]

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

The completed project will not create any new sources of light.

Construction activities are anticipated to be performed during normal working hours. Depending upon the final schedule of specific cleanup activities, temporary work lighting may be used to provide a safe work environment during low light conditions. Temporary work lighting is anticipated to be localized and short-term in duration, if needed.

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

Light or glare from the Project is not expected to create a safety hazard or interfere with views.

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

None

[13] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics
[14] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare

There are no known sources of off-site light or glare that may affect the proposed Project.

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

Light levels for the site would be designed to meet Occupational Safety and Health Administration (OSHA) requirements. Lighting will be shielded and directed toward work areas, and no off-site glare impacts are expected to result from its use. Lighting for the Project will be designed to ensure compliance with local regulations, which prohibit off-site glare impacts from direct or reflected light sources.

12. Recreation

Find help answering recreation questions

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

In the Project vicinity, the Harbor is used for recreational boating; recreational, commercial, and tribal fishing; shellfish harvesting; and other water-related activities.

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

The Project will not displace any existing recreational uses. Parts of the sediment cleanup unit may be closed during construction. Closures will be coordinated with WDFW, Ecology, and the LEKT to account for harvest activities and tribal events.

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

The applicant and Ecology will work with the LEKT to determine if further reductions to in-water work windows would be required to accommodate fishing and other harvesting activities (e.g., shellfish), as well as tribal events.

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions[15]

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.

Based on a review Washington State Department of Archaeology and Historic Preservation's (DAHP's) Washington Information System for Architectural and Archaeological Records Data (WISAARD) database, two properties located along the shoreline area of the Harbor are listed on the National Register of Historic Places (NRHP) and the Washington Heritage Register (WHR): the Tse-whit-zen village and cemetery cultural site and the Ediz Hook Light Station/U.S. Coast Guard (USCG) Air Station (DAHP 2024). Other properties along the Harbor shoreline

[15] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p

listed on the WHR include Hollywood Beach encampment located just east of the City Pier and the Puget Sound Cooperative Colony, located at the mouth of Ennis Creek. The Puget Sound Cooperative Colony has since been subsumed by the former Rayonier Mill, and the lighthouse complexes at Ediz Hook have all been removed (DAHP 2024).

Historic Property Inventories documented in WISAARD have been completed for six other properties within the Harbor, including: the former Rayonier Mill jetty (outside the SCU), the Merrill & Ring timber warehouse located along Marine Drive, railroad spurs along Tumwater Creek, and the USCG Air Station hangar and barracks/administration building located on Ediz Hook. The eligibility status for listing in the WHR or NRHP has not been determined for the former Rayonier Mill jetty or the Merrill & Ring timber warehouse. In 2020, the Rayonier dock, trestle, and foundation deck were determined to not be NRHP-eligible under Section 106. The Tumwater Creek rail spurs and bridge were determined to not be NRHP-eligible. In 2018, the two USCG buildings were determined to meet the criteria for NRHP and potentially contribute to a historic district, but an eligibility determination has not yet been made (DAHP 2024).

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 Archaeological Monitoring plan by Historical Research Associates, referenced in Question 8 of Part A reports on pre-historic and historic history of the adjacent upland mill site.

The Harbor is located within the traditional territory of the LEKT, who have engaged in discussions with Ecology throughout the RI/FS and IAP development process. Historically, much of the northern Olympic Peninsula and south Vancouver Island was the territory of the Klallam Tribe. The Harbor area was historically inhabited by two major Klallam villages -- I'e'nis, located along lower Ennis Creek within the millsite property, and Tse-whit-zen (Ecology 2012), near the base of Ediz Hook to the west of the millsite – an potentially a third at the mouth of Tumwater Creek. LEKT and the two other federally recognized S'Klallam Tribes have adjudicated treaty fishing areas throughout the Harbor. LEKT also owns real property along Ediz Hook and within a portion of the Tse-whit-zen site (all of it held in trust by the United States) and has been particularly active in restoring habitat in the Harbor with the goal of resuming the Tribes' ability to engage in treaty harvest of fish and shellfish.

Tse-whit-zen is the most prominent and well-documented of the aboriginal village sites. Archeological investigations in 2003 documented six longhouses in this village, along with a stockade similar to that observed at I'e'nis. Beginning over two thousand years ago, the LEKT utilized Tse-whit-zen in the traditional practices of sea mammal hunting, ocean fishing, and the burial of its members. At Tse-whit-zen, artifact deposits underlying historical fill have been identified and include artifact-bearing middens containing shell, stone, and bone

artifacts, projectile points, lithic debitage, and human remains (Oldham 2007). "The Tse-whit-zen site was significantly disturbed during excavations in 2003-04, and numerous cultural artifacts were unearthed along with over 350 sets of human remains. The artifacts have been preserved at the Burke Museum or repatriated to the Lower Elwha Klallam Tribe, and the human remains reinterred *in situ*. This is a site of rich cultural and archaeological significance, and any ground-disturbing activities in the area must be undertaken with great care."

A third, unnamed village was historically noted as being located at the mouth of Tumwater Creek (Tingwall and Rust 2009). This village was depicted on the 1853 Coast and Geodetic Survey map of the Harbor; however, no further evidence of this village has been found. There is a high probability that archaeological materials associated with ethnographic- to historic-period American Indian residential activities, as well as resource procurement, could be identified within the Harbor area.

Butler, et al. (2019a) presents the findings of the extensive excavation at "Číxwicən". The excavation documented human occupation spanning the last 2700 years and revealed remains of multiple plank houses. The study focused on analyzing the faunal records to understand changes and stability in human-animal relationships on the Northwest Coast. The analysis of over one million faunal specimens revealed changes in intertidal habitat, consistent resource use patterns across 2150 years of occupation, and the impact of tsunamis on animal populations.

Butler, et al. (2019b) published another article focusing on the faunal remains and geoarchaeological records to study the long-term human-environment relationships, particularly examining economically important animal species and human populations considering environmental and social changes. The article reviews previous archaeological investigations that uncovered over 12,000 artifacts, including stone tools, bone tools, shell beads, pottery fragments, and various other items. The project also involved the recovery and reburial of over 300 sets of human remains, highlighting the cultural and spiritual significance of Číxwicən as a sacred burial ground for the tribe.

During the RI/FS process for the Project, the LEKT have been a commenter on documents and have been engaged in discussions with Ecology. Additionally, the Klallam Tribe has present-day treaty rights to harvest shellfish and other aquatic species in the Harbor.

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 Archaeological Monitoring Plan lists the previous studies that were used to describe the pre-historic and historic uses of the adjacent upland former mill site.

Klallam tribal history was compiled from multiple sources including tribal and other relevant historically-related websites, and cultural resources surveys and inventories that have been completed in the Port Angeles area, as referenced herein. Specific information relative to historical property use in the Harbor was sourced from DAHP's WISAARD database. A secure, non-public database is available to credentialed professionals, and a public version can be accessed on DAHP's website. Remedial action planning relative to cultural resources will occur in Ecology-led coordination with Tribal representatives.

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.

Dock demolition will not impact any prehistoric or historic site. Upland excavations will be monitored.

Per the Washington Administrative Code (WAC) 173-340 Adopted Rule dated August 23, 2023, Inadvertent Discovery Plans (IDPs) are now required for all remedial actions. An IDP will be prepared per the WAC-173-340-815 3.b.ii and followed during all ground-disturbing activities during construction. Protocols to be incorporated into an IDP include those described in the following documents:

- Appendix: Elwha River Beach and Estuary Access and Management Ordinance Protocols for Management of Human Remains and Archaeological and Cultural Materials (Lower Elwha Klallam Tribe, 2019). (These Protocols are the Tribe's most recent refinements of its long-standing policy on management of human remains and cultural resources, very similar to protocols applied in other contexts at Port Angeles Harbor. Under the Ordinance to which they are an Appendix, they apply directly to activities within the Lower Elwha Reservation, but are to be incorporated into the IPD as a kind of best practices.)

- Archaeological Work Plan: Combined Sewer Overflow Project, Phase 1 (City of Port Angeles 2011)

- Preliminary Agreement Between Lower Elwha Klallam Tribe and Dept. of Ecology (Ecology 1999), requiring that a professional archaeologist, approved by the Tribe, shall monitor and have stop-work authority over all ground-disturbing activities, and that the Tribe shall concur in the disposition of any cultural resources affected by cleanup activities.

All protocols specified in the IDP must include provisions for utilization of Tribal cultural resource monitors.

Additionally, Ecology-led consultation with DAHP and potentially affected Indian tribes must occur prior to all remedial actions to assess any potential effects these actions may have on cultural resources. Based on consultations, a cultural resources plan, such as a survey

or monitoring plan may be required. Project remedial actions must comply with applicable state and federal laws outlined in WAC 173-340-815 Cultural resource protection.

As documented in the IDP, if an inadvertent discovery is made during Project activities, work in the immediate area of the discovery will be halted immediately 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. If remains are determined to be American Indian, consultation with the affected tribes will take place in order to mitigate the final disposition of said remains.

Should an inadvertent discovery occur, a professional archaeologist will assess the significance of the find and consult with DAHP and affected tribes will be notified so that an appropriate course of action can be implemented.

14. Transportation

Find help with answering transportation questions[16]

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.

North Ennis Street serves the adjacent upland former mill site. North Ennis Street is the only public street access. North Ennis Street is accessed from Highway 101.

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?

No . Nearest transit stop is approximately 0.4 miles away, located on East Front Street between N. Ennis St and N. Liberty St.

c. 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).

None. The Project will not require new roadways or pedestrian, bicycle, or state transportation facilities. Existing haul roads may need improvement.

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

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

[16] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation

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

The future use of the property is unknown, therefore no estimation of future traffic volumes for the completed project.

f. 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 Project will have no impact on the movement of agricultural products.

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

A traffic control plan will be developed prior to construction to reduce potential transportation impacts. This plan would be developed to support substantive compliance with City permitting requirements and will contain strategies for managing traffic during construction, traffic control, and notifications to nearby property owners. To support this effort, signs will be posted near the Rayonier property during Project design and construction that will include website and contact information to support communication and outreach.

15. Public services

Find help answering public service questions[17]

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 Project will not result in the need for additional public services.

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

No measures are proposed to reduce, or control impacts on public services.

16. Utilities

Find help answering utilities questions[18]

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

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:

No utilities serve the main dock. Electricity is available within the uplands portion of the site.

[17] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services
[18] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities

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.

No new utilities are proposed as part of this Project.

C.Signature

Find help about who should sign[19]

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.

Recoverable Signature

X Warren Snyder

Signed by: Warren Snyder

Type name of signee: Warren Snyder

Position and agency/organization: Director, Legacy Sites

Date submitted: **June 10, 2025**

[19] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature

D.Supplemental sheet for nonproject actions

Find help for the nonproject actions worksheet[20]

Do not use this section for project actions.

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. **How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?**

    - **Proposed measures to avoid or reduce such increases are:**

2. **How would the proposal be likely to affect plants, animals, fish, or marine life?**

    - **Proposed measures to protect or conserve plants, animals, fish, or marine life are:**

3. **How would the proposal be likely to deplete energy or natural resources?**

    - **Proposed measures to protect or conserve energy and natural resources are:**

4. **How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection, such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?**

    - **Proposed measures to protect such resources or to avoid or reduce impacts are:**

5. **How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?**

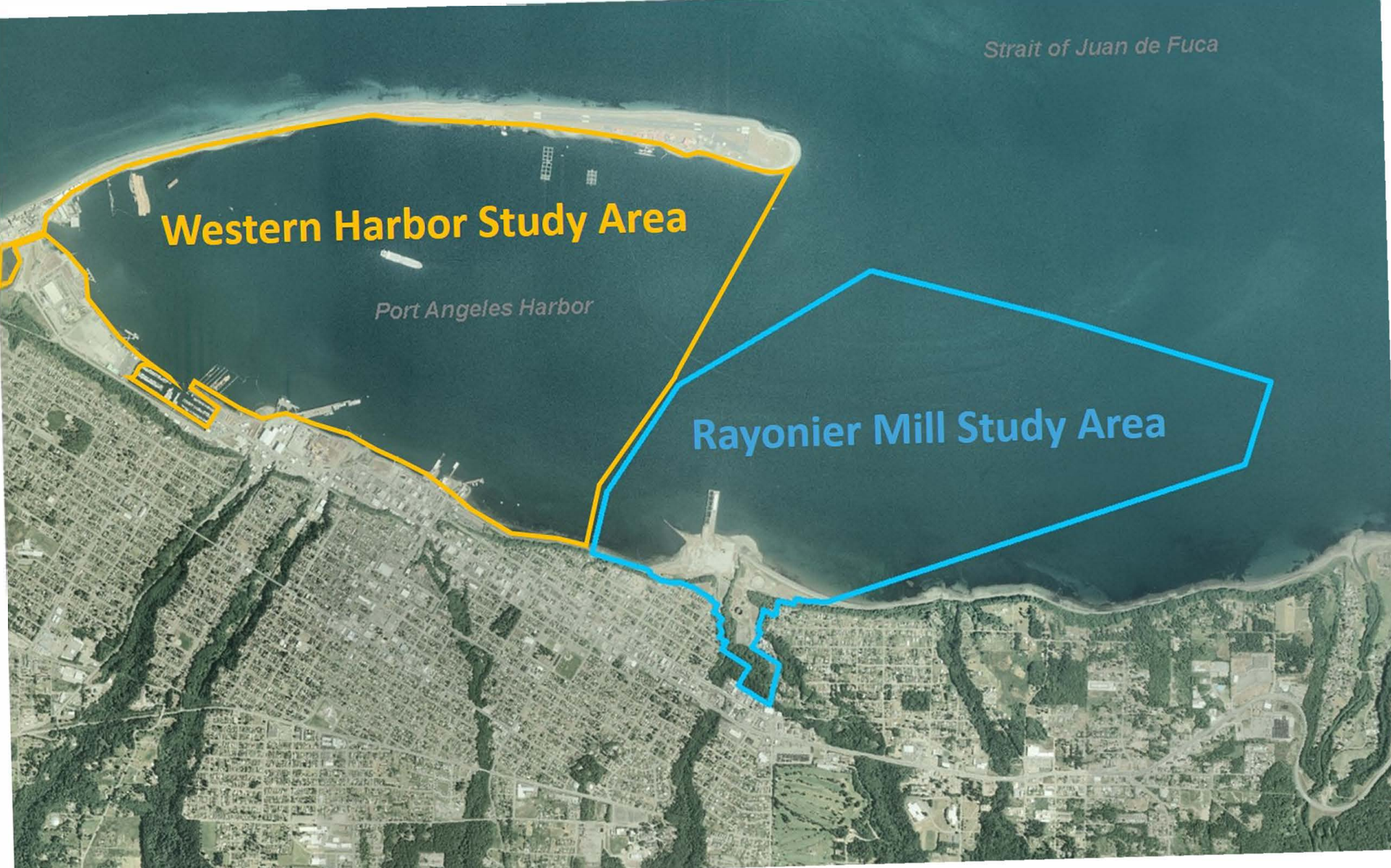
[20] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions

- **Proposed measures to avoid or reduce shoreline and land use impacts are:**

6. **How would the proposal be likely to increase demands on transportation or public services and utilities?**

   - **Proposed measures to reduce or respond to such demand(s) are:**

7. **Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.**


Strait of Juan de Fuca
Western Harbor Study Area
Port Angeles Harbor
Rayonier Mill Study Area

0 2,000 4,000 8,000

Feet

N

TITLE:

Site Map

LOCATION:

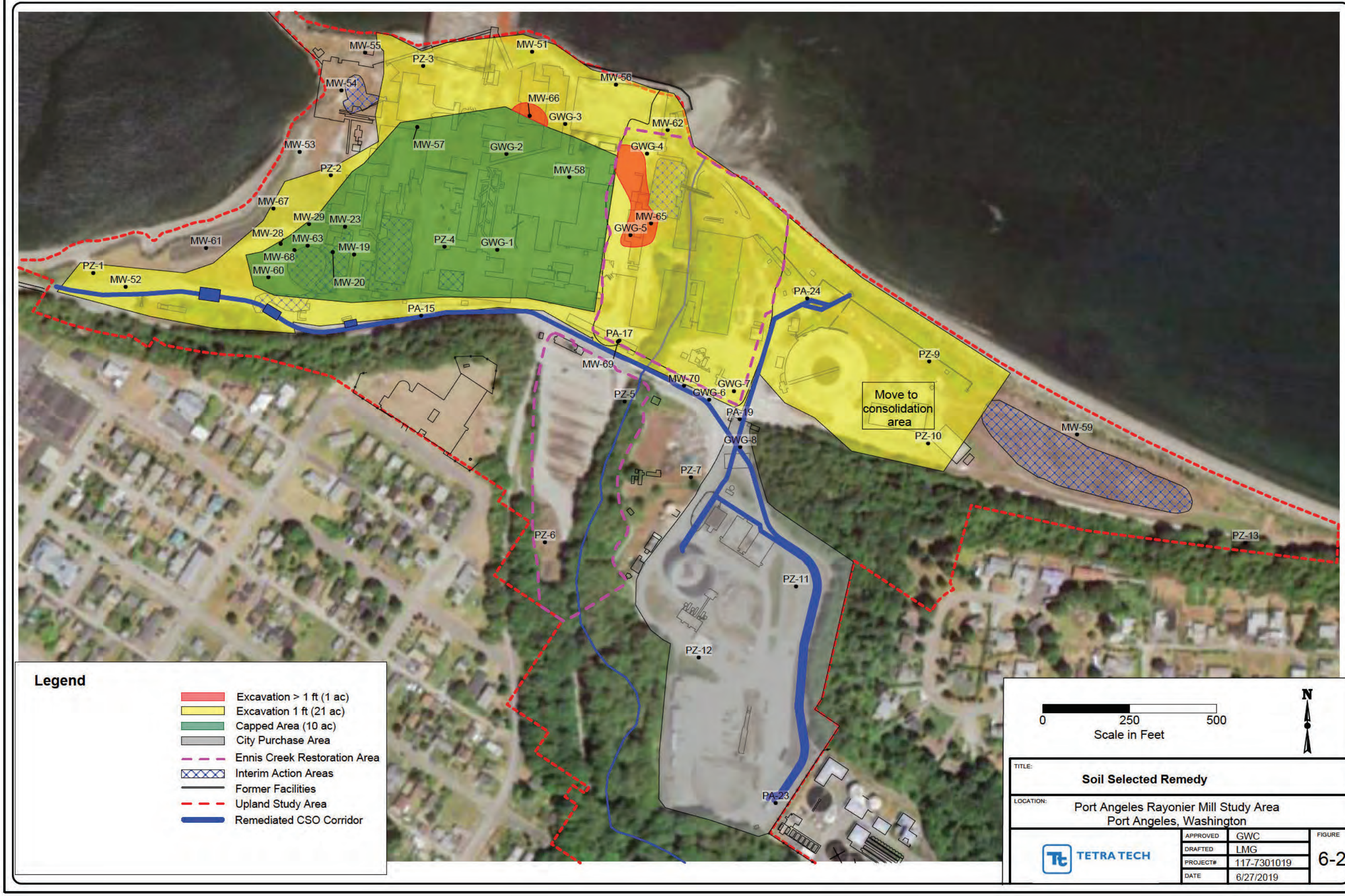
Port Angeles Rayonier Mill Study Area
Port Angeles, Washington

TETRA TECH

APPROVED	GC
DRAFTED	LMG
PROJECT#	117-7403019
DATE	6/27/2019

FIGURE **1-1**

P:\7304-RayonierAM\2019 Port Angeles FS\GIS\MXDs\SiteMapFig1_1.mxd



TITLE: **Soil Selected Remedy**

LOCATION: Port Angeles Rayonier Mill Study Area
Port Angeles, Washington

TETRA TECH

APPROVED	GWC
DRAFTED	LMG
PROJECT#	117-7301019
DATE	6/27/2019

FIGURE 6-2


MW-55
PZ-3
MW-51
MW-54
MW-56
MW-66
GWG-3
MW-62
MW-53
MW-57
GWG-2
GWG-4
PZ-2
MW-58
MW-67
MW-29
MW-23
MW-65
GWG-5
MW-28
MW-63
MW-61
PZ-4
GWG-1
MW-19
MW-68
PZ-1
MW-60
MW-52
MW-20
PA-24
PA-15
PA-17
PZ-9
MW-69
MW-70
GWG-7
GWG-6
PZ-5
PA-19
MW-59
GWG-8
PZ-10
PZ-7
PZ-6
PZ-13
PZ-11
PZ-12
PA-23
Legend
Initial Sparging System
Additional Sparging Wells
City Purchase Area
Ennis Creek Restoration Area
Interim Action Areas
Former Facilities
Upland Study Area
Remediated CSO Corridor
0
250
500
Scale in Feet
N
TITLE:
Groundwater Selected Remedy
LOCATION:
Port Angeles Rayonier Mill Study Area
Port Angeles, Washington
TETRA TECH
APPROVED GWC
DRAFTED LMG
PROJECT# 117-7301019
DATE 6/28/2019
FIGURE
6-4

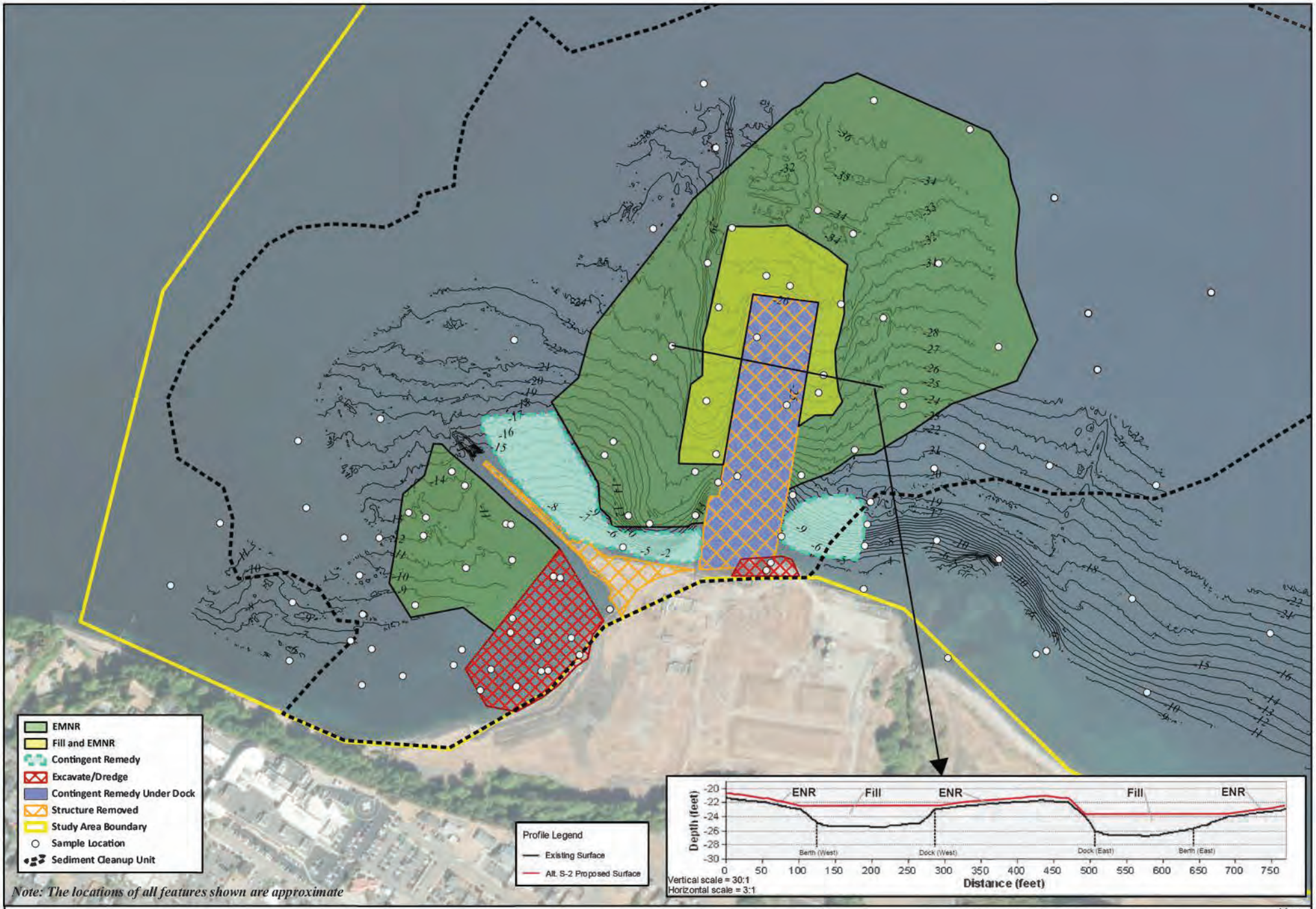


Figure 6-5. Sediment Selected Remedy