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*:** [help]

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:

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: [help]

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: [help]

Model Toxics Control Act Interim Action within the Columbia River adjacent to the Former Reynolds Metal Reduction Plant (Former Reynolds Plant)

2. Name of applicant: [help]

Millennium Bulk Terminals – Longview, LLC (MBTL) and Northwest Alloys, Inc. (Northwest Alloys)

3. Address and phone number of applicant and contact person: [help]

Applicants:
Mark Stiffler
Northwest Alloys, Inc.
201 Isabella Street
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Anchor QEA, LLC
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Phone (206) 310-2263

4. Date checklist prepared: [help]

May 16, 2014

5. Agency requesting checklist: [help]

Washington State Department of Ecology (Ecology)

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

Construction of the project is expected to take approximately 5 to 8 weeks to complete, with all in-water construction activities occurring within the agency-approved in-water work window for the project area to minimize potential disturbance of or impacts to sensitive fish and wildlife. The in-water work window for the Columbia River near Longview, Washington, is anticipated to occur between October 1 into or through December, and possibly beyond December 31, if allowed by authorizing agencies. The planned detailed schedule is described in Section 5 of the Interim Action Work Plan.

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

The work proposed in the Interim Action is separate and distinct from other activities proposed at the Former Reynolds Plant. There are no plans related to or connected with the proposed Interim Action work. The Interim Action work is limited solely to actions necessary to remediate sediments

in accordance with the Washington State Model Toxics Control Act (MTCA) Agreed Order No. DE-8940, as amended by Ecology. The Agreed Order is a formal agreement that was entered into by Ecology, Northwest Alloys (as the upland property owner), and MBTL (as the owner of the site improvements, property tenant, and current facility operator).

A MTCA Remedial Investigation and Feasibility Study (RI/FS) has been prepared for public review and comment. Future remedial actions are anticipated at the Former Reynolds Plant. As described in Section 6 of the Interim Action Work Plan, the final cleanup action will be implemented after development of Ecology's final cleanup decision for the site. The cleanup decision will be documented in a Cleanup Action Plan and implemented through a Consent Decree, both of which will be issued after an opportunity for public review and comment. This is expected to occur in 2015, and the final cleanup action will likely be implemented in 2016 or 2017. Section 6 of the Interim Action describes how the current Interim Action is expected to be integrated with the final cleanup action. However, the current Interim Action does not limit Ecology's discretion for selection of a final cleanup action.

The Interim Action is not related to any other maintenance, repair, or development/redevelopment proposals at the Former Reynolds Plant.

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

The following documents have been prepared for this project:

- Amendment to MTCA Agreed Order DE-8940. Executed by Ecology, MBTL, and Northwest Alloys. June 2014.
- Interim Action Work Plan. Prepared by Anchor QEA. June 2014.

The following documents contain supporting information used in developing the Interim Action Work Plan for this project:

- Draft Remedial Investigation and Feasibility Study Report. Prepared by Anchor QEA. June 2014.

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. [help]

Northwest Alloys is pursuing permits for other maintenance and repair actions near its existing dock located in the Columbia River and will soon be submitting permits actions on the upland facility, including replacement of the sanitary sewer collection system and repair to central and new utility lines. Permits for maintenance and repair actions related to the existing dock include maintenance dredging of the existing berth and separate permits for dock maintenance and repair. These actions are separate, distinct, and unrelated to the current cleanup action proposed in the Interim Action Work Plan.

MBTL intends to expand the existing bulk terminal facility that is served by the existing dock. This would potentially include new upland facilities and involve handling additional product to what is currently imported and exported. MBTL is also proposing to develop a coal export terminal, including construction of new docks and berth facilities in the Columbia River. These actions are separate, distinct, and unrelated to the current cleanup action proposed in the Interim Action Work Plan.

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

The project will be conducted as an interim action under an amendment to MTCA Agreed Order DE-8940. Ecology will issue a State Environmental Policy Act (SEPA) Determination based on the information contained within this SEPA checklist. The U.S. Army Corps of Engineers (USACE) must also approve the project under Section 404 of the Clean Water Act. It is anticipated that the Interim Action will qualify for coverage under USACE's Nationwide Permit 38 for Cleanup of Hazardous and Toxic Waste.

Because the Interim Action is conducted under a MTCA order, it is exempt from the procedural requirements of state and local permits that would otherwise be required, per Revised Code of Washington (RCW) 70.105D.090. However, the project is required to demonstrate substantive compliance with appropriate state and local permits or approvals. The following state and local requirements have been identified as applicable but are procedurally exempt for this Interim Action:

- Section 401 Water Quality Certification: Revised Code of Washington (RCW) 90.48 and 33 U.S.C. 1341
- Hydraulics Project Approval, Washington Department of Fish and Wildlife
- Shoreline Management Act, RCW 90.58; Cowlitz County Shoreline Substantial Development Permit, Cowlitz County Code (CCC) 19.20
- Major Grading Permit; Cowlitz County Grading Ordinance, CCC 16.35
- Cowlitz County Stormwater Requirements, CCC 16.22
- Critical Areas Permit; Cowlitz County Critical Areas Ordinance, CCC 19.15

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.) [help]

The Interim Action is described in detail in the Interim Action Work Plan (attached). The Interim Action will consist of the removal of up to 5,000 cubic yards of contaminated sediment from the Columbia River, the placement of dredged sediment in an on-site sediment placement area, and restoration of the remediation area by placing clean backfill. Work elements are described in detail in Sections 2.1 through 2.5 of the Interim Action Work Plan.

All in-water work will occur during the general work window for the Columbia River near Longview, Washington, from October 1 through December. Best management practices (BMPs) will be used for all project phases, as detailed in Appendix A. These BMPs may be updated during project permitting.
Prior to dredging, debris will be removed as necessary from the dredging area. If logs are encountered, they will be removed from the work area and managed consistent with project permits and authorizations. All debris removed from the river will be disposed of appropriately.

The proposed dredging will remove up to 5,000 cubic yards (cy) of contaminated sediment (including over-dredge allowance) from an area immediately adjacent to an outfall (Outfall 002A) in the Columbia River. The dredging area is shown in plan view in Figures 2 and 3, and in cross section view in Figure 4 of the Interim Action Work Plan. Following dredging, the dredging area will be backfilled with clean sandy materials (equivalent to the quantity of sediments removed by dredging).

The dredged materials removed will be transloaded to an upland placement area shown in Figure 5 of the Interim Action Work Plan. Transloading will be performed using one of two on-site transloading locations, or an appropriately-permitted off-site transloading location. Sediment transloading and placement are described in Sections 2.3 and 2.4 of the Interim Action Work Plan. Sediment transloading will occur using a high-solids pump, a conveyor, or mechanical equipment as described in Section 2.4 of the Interim Action Work Plan.

As described in the project BMPs (see Appendix A of the Interim Action Work Plan), barges used for sediment dredging, transport, and transloading will not be allowed to ground. Barges may be held in place during dredging or transloading with anchors or spuds. If additional methods are required, the specific methods will be defined in the Engineering Design Report.

Water generated from the upland placement area will be collected and pumped to the existing on-site water treatment facility for treatment consistent applicable requirements of NPDES permit No. WA-000008-6. This will include both stormwater and waters generated during passive sediment dewatering in the placement area.

Following placement and passive dewatering, the sediment placement area will be re-graded so that the surface runoff drains consistent with existing site conditions. Finally, the upland sediment placement area will be covered with a temporary synthetic cover to secure the material pending selection of the final cleanup actions for the upland remediation.

See the attached Interim Action Work Plan, including Figures 1 through 5 and Appendix A (BMPs), for additional detail regarding the proposed project.

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. [help]

The project is located in portions of Sections 25, 26, 35, and 36 of Township 8 North, Range 3 West of the Willamette Meridian. The approximate latitude and longitude coordinates are 46.137111 North and -123.004119 West for the remediation area and 46.141311 North and -123.010803 West for the upland placement area.

The Former Reynolds Plant located at 4029 Industrial Way along the Columbia River just outside the city limits of Longview, Washington 98632 (see Figure 1 of the Interim Action Work Plan). The Former Reynolds Plant includes Tax Parcels #6195302, 61950, and 61953, which are owned by Northwest Alloys. MBTL has been the owner of the facility assets and a tenant on the property since January 2011. For the purposes of this checklist, "site" refers to the property referenced by the above parcel numbers and the aquatic lands referenced below, including the sediment remediation area.

The Northwest Alloys-owned property extends to the extreme low water mark of the Columbia River. The aquatic lands located off shore of this point are owned by the State of Washington and are managed by the Washington State Department of Natural Resources (WDNR). The sediment remediation area is located on land leased to Northwest Alloys by WDNR (WDNR Aquatic Lands Lease #20-B09222).

The sediment remediation area (see Figures 2 and 3 of the Interim Action Work Plan) was delineated during sediment sampling overseen by Ecology during development of the Draft RI/FS (Anchor QEA 2014).

The conservatively delineated remediation area encompasses approximately 31,250 square feet (approximately 0.7 acre) and extends less than 2 feet below the sediment mudline (see Figure 2 of the Interim Action Work Plan). Sediment removal by dredging will require removal of additional materials below this depth (over-dredge allowance).

B. ENVIRONMENTAL ELEMENTS [help]

1. Earth

a. General description of the site [help]
(circle one): Flat, rolling, hilly, steep slopes, mountainous,
other _____

The upland area of the Former Reynolds Plant is generally flat. There are a number of steep slopes associated with on-site ditches, as well as on-site levees along the Columbia River that are managed and maintained by the Consolidated Diking and Improvement District (CDID). Bathymetry in the nearshore slopes gently from the shoreline to the navigation channel where it then drops off.

The sediment remediation area is located from approximately 0 to -25 feet NGVD29. Slopes are flatter than 3H:1V.

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

The upland area of the Former Reynolds Plant contains an average slope of less than two percent. The CDID levees are constructed at an approximately a 3H:1V (or 33 percent) slope. The steepest in-water slope within the Columbia River is approximately 3H:1V or 33 percent slope.

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. [help]

Geological conditions within and adjacent to the Former Reynolds Plant are described in the Draft RI/FS (Anchor QEA 2014). The soils found on the upland portions of the site are primarily clay and loam with the exception of an area of peat soils found in the northeastern portion of the property. The Natural Resource Conservation Service (NRCS) Web Soil Survey map for Cowlitz County identifies six different soil series on the site, including Arents, Caples silty clay loam, Maytown silt loam, Pilchuck loamy fine sand, Semiahmoo muck, and Snohomish silty clay loam (NRCS 2014). Soils found in the upland portion of the project area where the sediment placement area will be located include Arents, Caples silty clay loam, Maytown silt loam, and Pilchuck loamy fine sand (NRCS 2014). No prime farmland exists on the site. Soils within the site have been significantly disturbed by historical grading, filling, and excavation activities associated with historical and current industrial activities.

Surface sediments in the remediation area generally consist of a thin layer of brown flocculent material, underlain by silty sand. In the shallower half of the sediment area (i.e., toward the shoreline), silty sands are underlain by a poorly graded sand unit or by more silty sands. In the deeper half of the sediment area (i.e., toward the channel), silty sands are underlain by a hard silt/clay unit at 1 to 1.5 feet below mudline.

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

There are no surface indications or history of unstable soils at the site.

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

Excavation will involve the removal of up to approximately 5,000 cy of sediments over approximately 31,250 square feet. All excavation will occur in sediments with an existing mudline elevation of approximately 0 to -25 feet NGVD29 as necessary to remove the contaminated sediments. The depth of dredging will be a minimum of 2 feet below mudline and up to approximately 4 feet below mudline. Figure 3 shows a plan view of the dredging area, and Figure 4 shows cross-sections of the dredging area and dredging depths. Contaminated sediment will be

dredged by mechanical means with the use of an environmental bucket to the extent practicable; however, a digging bucket may be required for the dredging of hard clay sediment in the south portion of the dredging area. Dredged material will be placed on a barge and moved to an upland, transload facility location. Barge movement will remain in sufficient water depth at all times to avoid grounding during low-water conditions. BMPs to be utilized during dredging are described in Appendix A of the Interim Action Work Plan.

Clean, sandy backfill material will be placed in the dredging prism to balance the quantity of materials removed from the river. The backfill will consist of clean (non-contaminated) sandy materials similar to the existing sandy sediments located in the Columbia River adjacent to the Former Reynolds Plant. Placement methods will ensure that the total placement quantity is consistent with the quantity of material removed by dredging. Placement thicknesses will vary, with a 1-foot minimum thickness placed throughout the dredging area. Clean backfill material will be transported to the work area by barge and will be placed in the dredging area using mechanical dredging equipment. Bathymetric surveys performed before and after the placement of backfill will verify that placement has occurred according to project requirements.

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

The upland sediment placement area (see Figure 5 of the Interim Action Work Plan) will be cleared and grubbed. A berm will be constructed around the placement area, and the sediments will be covered after placement and dewatering. Erosion could occur during upland construction activities; however, BMPs will be employed as described in Appendix A of the Interim Action Work Plan to minimize erosion.

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

No additional areas of impervious surfaces will be placed as part of this Interim Action. As part of the Interim Action, the upland sediment placement area will be constructed within an existing landfill and fill deposit located in the southwest corner of the upland property. The sediment placement area will be covered with a temporary synthetic material pending future construction of the final cleanup action for this area.

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

BMPs will be implemented to reduce and control erosion and other impacts to the earth (see Appendix A of the Interim Action Work Plan).

2. Air

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

The Interim Action will result in short-term increases in emissions from heavy equipment used to complete the construction activities. This equipment will include tug vessels, trucks, and heavy equipment used to dredge, transload, and place the contaminated sediments and sandy backfill. No long-term increases in air emissions will result from the completed project.

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

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

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

BMPs will be implemented to reduce and control emissions or other impacts to air (see Appendix A of the Interim Action Work Plan).

3. Water

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. [help]

The project area is located in and along the Columbia River in Longview, Washington. This portion of the Columbia River is freshwater and tidally influenced. This area is designated as "shoreline" by the WDNR's Water Typing System (as referenced in WAC 222-16-031(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. [help]

Yes, the Interim Action will require excavation and fill within the Columbia River, and transloading of sediments in overwater or shoreline areas. The on-site, upland sediment placement area is to be constructed more than 200 feet from the described waters. Proposed work areas are shown in Figures 1 through 5 of the Interim Action Work Plan.

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. [help]

Excavation will involve the removal of up to approximately 5,000 cy of sediments (including over-dredge allowance). The remediation area is approximately 31,250 square feet. An equivalent quantity of sandy materials will be used to backfill the dredging area excavation. The sandy materials will be sourced from a nearby quarry source or from a riverine-sourced material. The material will be similar in grain size to existing local sandy sediments and will be tested prior to implementing the project to ensure that it is free from contamination.

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

No surface water withdrawals or diversions are planned as part of the Interim Action.

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

The upland placement area is located within the floodplain of the Columbia River. However, this area is protected by the flood control levee operated by the Consolidated Diking and Improvement District (CDID). Along the Former Reynolds Plant, the height of the levee averages approximately 32 feet above mean sea level, which protects the site from flood events with recurrence intervals of greater than 500 years.

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. [help]

Dredging, backfilling and transloading activities will be performed using the BMPs to reduce and control discharges of waste materials to surface waters (see Appendix A of the Interim Action Work Plan). Water generated from the upland placement area will be collected and pumped to the existing on-site water treatment facility for treatment consistent applicable requirements of NPDES permit No. WA 000008-6. Stormwater and waters generated during passive sediment dewatering in the placement area will also be managed in this manner.

b. Ground Water:

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

No water is proposed to be withdrawn from or discharged to groundwater as part of this project.

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. [help]

No waste material is proposed to be discharged into the ground. Dredged material will be placed on the ground to be beneficially reused as a component of a landfill cap in the final site remedial action.

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. [help]

Water generated from the upland placement area will be collected and pumped to the existing on-site water treatment system for treatment consistent applicable requirements of NPDES permit No. WA 000008-6. Stormwater and waters generated during passive sediment dewatering in the placement area will also be managed in this manner.

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

It is unlikely that waste materials would enter surface waters from the site. Risks of spills during construction would be managed through BMPs as described in Appendix A of the Interim Action Work Plan. The chemical constituents present in the dredged sediments are similar in type and concentration to those in soils and fill underlying the sediment placement area. The sediment placement area is located above the elevation of groundwater. The dredged materials are to be covered with a temporary synthetic material until future implementation of a final upland cleanup action for this area.

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

Drainage from within the on-site, upland placement area will be managed the same manner as prior to placement. Stormwater drainage from the upland placement area and vicinity will continue to be managed consistent with the requirements of NPDES Permit No. WA 000008-6.

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

The sediment placement area will be surrounded by a containment berm. Waters generated during sediment placement and dewatering (including stormwater) will be managed consistent with the requirements of NPDES Permit No. WA 000008-6. The sediments will be covered with a temporary synthetic cover pending implementation of the final cleanup action.

4. Plants [help]

a. Check the types of vegetation found on the site: [help]

____deciduous tree: alder, maple, ~~aspen,~~ other:
____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
____other types of vegetation

The sediment placement area is mostly composed of grass species and small shrubs. No vegetation is found in the aquatic portions of the remediation site.

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

The existing vegetation cover in the upland sediment placement area is mostly composed of grass species and small shrubs. The sediment placement area (approximately 0.9 acre) will be cleared and grubbed prior to construction of the containment berm and placement of the dredged materials. The aquatic work area is devoid of vegetation.

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

No threatened or endangered plant species are in the project area.

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

No plantings are proposed as part of this project.

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

The noxious weeds and invasive species observed on or near the site consist of those species typically found on developed industrial areas in and around Longview, Washington. The following noxious weeds, listed on the 2013 Cowlitz County Noxious Weeds List, have been observed on or near the Former Reynolds Plant: Scotch broom (*Cytisus scoparius),* Canada thistle (*Cirsium arvense*), English ivy (*Hedera helix*), policeman's helmet (*Impatiens glandulifera*), reed canarygrass (*Phalaris arundinacea*), Himalayan blackberry (*Rubus bifrons*), common tansy (*Tanacetum vulgare*).

Invasive purple loosestrife (*Lythrum salicaria*), an aquatic plant, is a problem in the Columbia River estuary (up to approximately river mile 29) but does not extend further upriver (USACE 2003). Eurasian milfoil (*Myriophyllum spicatum*) is found in the Columbia River where other aquatic vegetation exists.

According to an extensive sampling effort completed in 2004, it is estimated that at least 81 invasive species have been introduced into the lower Columbia River since the mid-1800s, of which, 23% are aquatic plants (Sytsma et al. 2004).

5. Animals

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include: [help]

birds: hawk, heron, eagle, songbirds, other: osprey, other: birds of prey corvids, waterfowl
mammals: deer, beaver, other: marine mammals (California sea lions, Steller sea lions), weasels, mink, small mammals (mice, voles, moles, etc.)
fish: bass, salmon, trout, smelt, shellfish, other: steelhead, sturgeon, northern pikeminnow, etc.

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

Table 1 details several Endangered Species Act (ESA)-listed species known to potentially occur in or near the Columbia River, adjacent to the site.

Table 1
ESA-listed Species Potentially in the Vicinity of the Former Reynolds Plant Interim Action Project

Species	Status	Agency	Critical Habitat Status
Chinook Salmon (*Oncorhynchus tshawytscha*) – Upper Columbia River Spring Run Evolutionarily Significant Unit (ESU)	Endangered	NMFS	Designated
Chinook Salmon (*Oncorhynchus tshawytscha*) – Lower Columbia River ESU, Snake River Spring/Summer Run ESU, Snake River Fall Run ESU, Upper Willamette River ESU	Threatened	NMFS	Designated
Chum Salmon (*O. keta*) – Columbia River ESU	Threatened	NMFS	Designated
Coho Salmon (*O. kisutch*) – Lower Columbia River ESU	Threatened	NMFS	Not yet proposed
Sockeye Salmon (*O. nerka*) – Snake River ESU	Endangered	NMFS	Designated
Steelhead Trout (*O. mykiss*) – Lower Columbia River Distinct Population Segment (DPS), Middle Columbia River DPS, Upper Columbia River DPS, Snake River Basin DPS, Upper Willamette River DPS	Threatened	NMFS	Designated
Bull Trout (*Salvelinus confluentus*) –U.S.A., conterminous, lower 48 states	Threatened	NMFS	Designated
North American Green Sturgeon (*Acipenser medirostris*) – Southern DPS	Threatened	NMFS	Designated
Columbia River Smelt (Eulachon) (*Thaleichthys pacificus*) – Southern DPS	Threatened	NMFS	Designated
Streaked Horned Lark (*Eremophila alpestris strigata*) – wherever it is found	Threatened	USFWS	Designated
Columbian white-tailed deer (*Odocoileus virginianus leucurus*) – Columbia River population	Endangered	USFWS	None

Notes:
DPS – Distinct Population Segment
ESU – Evolutionary Significant Unit
NMFS – National Marine Fisheries Service
USFWS – U.S. Fish and Wildlife Service

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

The site is within the Pacific Flyway for migrating waterfowl. During the migratory season, the project site could conceivably be frequented by migrating waterfowl. Fish (e.g., salmonids, euchalon, and sturgeon) and marine mammals (e.g., California sea lion, and Steller sea lion) are also known to migrate through the Columbia River.

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

All work will be conducted consistent with the requirements of permits to be developed with the U.S. Army Corps of Engineers, including requirements defined to address requirements of the ESA. Work methods will also be reviewed with input from the Washington Department of Fish and Wildlife. All in-water work will comply with applicable work windows. Other BMPs are described in Appendix A to the Interim Action Work Plan.

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

According to an extensive sampling effort completed in 2004, it is estimated that at least 81 organisms have been introduced into the lower Columbia River since the mid-1800s (Sytsma et al. 2004). The majority of these species were fish (28%), aquatic plants (23%), and crustacea (15 %). The remaining 18% was a combination of mollusks, annelids, bryozoans, cnidaria, amphibians, reptiles, and an aquatic mammal (Sytsma et al. 2004).

6. Energy and natural resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. [help]

The Interim Action is being conducted to implement the remediation of sediments located adjacent to Outfall 002A, consistent with the requirements of Agreed Order No. DE-8940 as amended. No new sources of energy will be required once the project is complete.

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

The Interim Action 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: [help]

The Interim Action will be performed using appropriately sized marine and upland equipment to minimize energy consumption while safely completing the required work. On-site sediment transloading locations will be used if practicable to minimize energy use associated with sediment transportation. The implementation of the project is not expected to affect energy usage; therefore, no reduction measures are proposed.

7. Environmental health

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

The Interim Action will remove contaminated sediments from a localized area near Outfall 002A. The goal of the Interim Action is to reduce potential risks to human health and the environment by

completing the remediation of this area. Contaminated sediments will be handled and placed on-site in a manner consistent with provisions in the amendment to the Agreed Order No. DE-8940. Appropriate best management practices (see Appendix A of the Interim Action Work Plan) will be implemented to minimize potential risks of spills or other releases during implementation of the work.

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

The Draft RI/FS (Anchor QEA 2014) describes in detail the current information regarding the nature and extent of contamination in sediments and in upland soils and groundwater at the site. The current Interim Action will remediate sediment contamination determined by Ecology to require remediation under MTCA. The sediment placement area (see Figure 5 of the Interim Action Work Plan) is located within a contaminated fill deposit that requires further remediation under MTCA.

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 Interim Action will remove up to approximately 5,000 cy of sediment from the river (including over-dredge allowance). BMPs will be implemented to reduce and control potential hazards and conditions (see Appendix A of the Interim Action Work Plan). The sediment placement area (see Figure 5 of the Interim Action Work Plan) is located within a contaminated fill deposit that requires further remediation under MTCA.

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.

Other than the dredging, transloading, and placement of contaminated sediments and the use of petroleum fuels for operation of construction equipment, no storage, use, or production of toxic or hazardous chemicals are planned as part of this project.

4) Describe special emergency services that might be required.

The Interim Action will comply with all applicable regulations related to emergency services. No special emergency services are anticipated to be needed.

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

The Interim Action will include implementation of a water quality monitoring plan and a spill prevention, control, and countermeasures plan. Appropriate BMPs will be implemented to reduce and control environmental health hazards (see Appendix A of the Interim Action Work Plan).

b. Noise

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

None.

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. [help]

Short-term increases in noise may occur from excavation and placement activities. Project BMPs include provisions for use of properly functioning mufflers, engine-intake silencers, and engine closures according to federal standards. Long-term noise levels at the site will remain similar to existing levels after project completion.

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

Project BMPs include provisions for use of properly functioning mufflers, engine-intake silencers, and engine closures according to federal standards. All work activities will be performed in accordance with county and federal requirements for noise and obtain any site-specific requests for variances or other construction-related noise issues associated with the project.

8. Land and shoreline use

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

The Former Reynolds Plant was formerly used for the manufacture of aluminum. Aluminum manufacturing operations ended in 2001, and portions of the Former Reynolds Plant have since been decommissioned. MBTL currently operates a bulk products terminal on the site that handles multiple products, including alumina, which is required for operation of an active Alcoa aluminum manufacturing facility near Wenatchee, Washington. MBTL also receives coal by rail, stores it on site, and transfers it by truck to Weyerhaeuser for use by that company.

The site (including both the Former Reynolds Plant and the adjacent leased areas within the Columbia River) comprises approximately 460 acres and is bounded by the Columbia River on the south and drainage ditches on the north, east, and west. The drainage ditches are operated by the CDID, which also manages the levee located within the site along the Columbia River shoreline. The ditches include CDID Ditch No. 14 to the west, CDID Ditch No. 10 to the north, and CDID Ditch No. 5 to the northeast. The property is bordered by the Weyerhaeuser industrial facility to the east.

The site is located in unincorporated Cowlitz County, in an area zoned for industrial uses. Industrial Way (SR 432) is the nearest transportation corridor and it extends through the north side of the property. The site includes multiple driveway access points, and connections to mainline rail operated by Burlington Northern Santa Fe railroad.

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? [help]

There is no documentation of agricultural or forestry use at 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:

No.

c. Describe any structures on the site. [help]

The Former Reynolds Plant is located within a portion of the property owned by Northwest Alloys. Northwest Alloys owns a total of approximately 536 acres of property. However, only the southern portion of this property (approximately 436 acres located south of Industrial Way) was included in the historical aluminum manufacturing operations. The Northwest Alloys property located north of Industrial Way remains undeveloped except for a small building that was a credit union, an old softball field, and power lines.

The Former Reynolds Plant also includes an existing dock structure and two wastewater outfalls that are located within the Columbia River. Neither the dock nor Outfall 001S are located within the dredging or backfill area. Outfall 002A discharges through a diffuser approximately 49 feet in length, located within the sediment remediation area, which is located within the Columbia River, off shore of the NW Alloys-owned property. The sediment remediation area ranges in mudline elevation from approximately 0 to -25 feet NGVD29. There are no structures located in the on-site, upland sediment placement area.

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

No structures will be demolished as part of this project.

e. What is the current zoning classification of the site? [help]

The portion of the property where the project will occur is within Cowlitz County jurisdiction and zoned as Heavy Manufacturing (Cowlitz County 2014). The in-water portion of the project is in the Columbia River and not zoned (Cowlitz County 2014).

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

The portion of the site south of Industrial Way and adjacent to the shoreline is designated as Industrial Heavy and the Columbia River is designated as Forestry-Open Space by Cowlitz County (Cowlitz County 2014).

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

Currently, Cowlitz County is undergoing an update to its Shorelines Management Master Program adopted in 1977. Per the currently available online Draft Shoreline Environmental Designation Map, the project site is designated as Water Dependent Industrial (Cowlitz County 2014).

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

The Columbia River, Columbia River shoreline, and Columbia River floodplain have been identified as environmentally sensitive or critical areas per the Cowlitz County Code 19.15. Additionally, the reach of the Columbia River adjacent to the project site is designated as critical habitat for 12 populations of salmon and steelhead for migration and rearing.

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

The Interim Action would not add any additional workers beyond the current levels, once completed.

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

No people will be displaced by the project.

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

No displacements will result from this project; therefore, no measures are proposed to avoid or reduce displacements.

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

In accordance with MTCA, Ecology will consider the existing zoning when determining cleanup levels and actions for the site. The Interim Action is being performed as directed by Ecology.

m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

The Interim Action is not expected to impact any nearby agricultural or forest lands.

9. Housing

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

No housing units would be proposed or constructed as part of this project.

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

No housing units would be eliminated as part of this project.

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

No housing currently exists on-site; therefore, no measures are proposed to control housing impacts.

10. Aesthetics

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

No new structures are proposed for this project.

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

Views in the immediate vicinity of the site will not be obstructed or altered as a result of the project, and the site will retain its existing industrial character.

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

Since the project will not alter existing views, no measures are proposed to reduce effects.

11. Light and glare

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

The existing light and glare at the property is typical to industrial sites. During the project, additional lighting will be necessary during low-light conditions and nighttime activities. Lighting will be directed away from the water where practicable.

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

Light and glare from the project is not expected to be a safety hazard or interfere with views.

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

No existing off-site sources of light or glare are expected to affect the project.

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

Appropriate BMPs will be implemented to reduce and control light and glare impacts (see Appendix A of the Interim Action Work Plan).

12. Recreation

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

Recreational boating and fishing opportunities exist in the Columbia River, adjacent to the site. The property to the west of the project, a closed wood waste landfill, is vacant and has been purchased by the Port of Longview.

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

The Interim Action will not displace any existing recreational uses on or adjacent to the site.

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

The Interim Action is not expected to affect recreational uses; therefore, no measures are proposed to reduce effects.

13. Historic and cultural preservation

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

Portions of the Former Reynolds Plant include buildings and structures that are more than 45 years old. The Interim Action will not result in removal or modification of any of the existing buildings or structures. The only upland ground disturbance to be performed during the Interim Action is the clearing and grubbing of the sediment placement area. This are is located within a fill deposit created during operation of the Former Reynolds Plant.

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. [help]

There are no known landmarks, features, or evidence of historic, archaeological, scientific, or cultural importance known to be on the site. The project does not include disturbances to intact native sediment or upland soils. The project involves the removal of river sediment that has deposited from upstream sources. Previous archaeological monitoring performed during upland geotechnical investigations and during environmental investigations has not identified the presence of artifacts or areas of cultural importance. No potentially significant submerged structures or artifacts were identified in the proposed dredging area during a previous diver survey. Therefore, no objects of historic or cultural significant are likely to be encountered during construction.

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. [help]

There are no known landmarks, features, or evidence of historic, archaeological, scientific, or cultural importance known to be on the site, including in the sediments that will be dredged for this interim remedial action. The project does not include disturbances to upland soils or the intact native sediment present at greater depths than sediments affected by releases from Outfall 002A. The project involves the removal of river sediment that has deposited from upstream sources. Previous archaeological monitoring performed during upland geotechnical investigations and during environmental investigations has not identified the presence of artifacts or areas of cultural importance. No potentially significant submerged structures or artifacts were identified in the proposed dredging area during a previous diver survey. Therefore, no objects of historic or cultural significant are likely to be encountered during construction.

However, the project requires a USACE Nationwide 38 permit. General Condition 20 for USACE Nationwide permits requires USACE to evaluate whether the proposed activity may affect properties listed or eligible for listing in the in the National Register of Historic Places (National Register) and as appropriate to consult with the Department of Archaeology and Historic Preservation and any Indian tribe that may attach religious and cultural significance to properties of concern in order to ensure compliance with Section 106 of the National Historic Preservation Act.

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.

The project does not include disturbances to intact native sediment or upland soils. The project involves the removal of river sediment that has deposited from upstream sources and is contaminated with discharges from an outfall. No adverse impacts are anticipated. The Interim Action will be performed in compliance with all applicable regulations, including requirements of Section 106 of the National Historic Preservation Act. In accordance with USACE Nationwide permits General Condition 21, if any previously unknown historic, cultural, or archeological remains or artifacts are discovered while carrying out the activity authorized by USACE Nationwide permit, the USACE will be immediately notified, and to the maximum extent practicable, construction activities that may affect the remains and artifacts will be avoided until the coordination that USACE must conduct is completed.

14. Transportation

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

The site can be accessed via 38th Avenue or Industrial Way (SR 432). The existing designated truck route is Industrial Way.

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? [help]

The nearest transit stop is approximately 0.7 mile to the north at the intersection of 38th Avenue and Ocean Beach Highway (SR 4).

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

Existing parking areas will remain, and no parking areas will be eliminated as a result of the completed project.

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). [help]

The Interim Action will not require any new roads or improvements to existing roads.

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

The project will occur in nearshore areas along-side the Columbia River Navigation channel. No impacts to river navigation are anticipated. If the existing dock is used for sediment transloading, then work activities will be scheduled to avoid interference with periodic alumina ship offloading activities.

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? [help]

None.

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.

No.

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

The project will use on-site sediment transloading facilities if practicable to minimize potential impacts on transportation.

15. Public services

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

No.

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

No impacts are anticipated.

16. Utilities

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

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. [help]

No new utility services are required by the project. Stormwater and other waters generated during the project will be managed within the existing NPDES-permitted treatment system in compliance with Permit No. WA 000008-6.

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: **Mark Larsen**

Position and Agency/Organization: **Anchor QEA, LLC**

Date Submitted: **May 27, 2014**

References

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