WAC 197-11-970 Determination of nonsignificance (DNS)

Description of proposal: GP West Pulp and Tissue Mill Remedial Action Unit (RAU) cleanup. The cleanup action will be conducted under a Consent Decree between the Pot of Bellingham and Ecology in accordance with the Model Toxics Control Act (MTCA). Cleanup activities include removal of petroleum contaminated soils to prevent contamination of groundwater and air, containment of contaminated soils to eliminate direct contact and erosion pathways for the protection of the marine environment, monitored natural attenuation to monitor and evaluate metals-contaminated groundwater to ensure concentrations are declining as expected, and institutional controls to ensure the long-term integrity of the cleanup action and prohibit actions such as extraction of groundwater for drinking water.

Proponent: Port of Bellingham

Location of proposal, including street address, if any: The approximate 31 acre Pulp and Tissue Mull RAU is located within the City of Bellingham limits. The property is situated within potions of Section 25, Township 38N, Range 02E and Section 30, Township 38N, Range 03E of the Willamette Meridian. Latitude 48.749881North, Longitude -122.484247 West, 300 West Laurel Street, Bellingham, Washington. The property is located within the Waterfront District – Commercial Mixed Use and Industrial Mixed use.

Lead agency: Washington State Department of Ecology

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

☐ There is no comment period for this DNS.

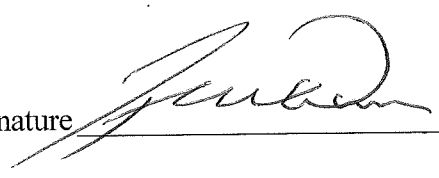
☐ This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS.

X This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below. Comments must be submitted by August 27, 2014.

Responsible official: Robert W. Warren, P.Hg., MBA

Position/title: Section Manager, Toxics Cleanup Program, Northwest Regional Office Phone: 425 649-7000

Address: 3190 160th Ave., SE, Bellevue, WA 98008

Date 6-24-14 Signature 

STATE ENVIRONMENTAL POLICY ACT (SEPA)
ENVIRONMENTAL CHECKLIST

A. BACKGROUND

1. Name of proposed project: GP West-Pulp and Tissue Mill Site Cleanup Action

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

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

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

4. Date checklist prepared: June 3, 2014

5. Agency requesting checklist: Washington State Department of Ecology

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

   The Georgia-Pacific West Site (Site) is a waterfront industrial property acquired by the Port of Bellingham from Georgia-Pacific Corporation in January 2005. The Site, located at 300 West Laurel Street in Bellingham, Washington, encompasses approximately 75 acres on the south side of the Whatcom Waterway. A Pulp and Tissue Mill operated at the Site from 1926 through 2007. The project subject to this SEPA checklist is the Cleanup Action for the 31 acre Pulp and Tissue Mill Remedial Action Unit (RAU) as shown on Figure 1.

   The Cleanup Action is expected to occur in a phased approach including detailed design and engineering, permitting, and construction. The current schedule anticipates construction activities to occur in 2015 and 2016.

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

   The Cleanup Action is intended to be an independent project designed to address historical contamination and protect human health and the environment. Following the completion of the Cleanup Action, it is anticipated that the property will be redeveloped by the Port of Bellingham, the City of Bellingham and private parties into a mixed use urban waterfront. Although the Cleanup Action acknowledges the future redevelopment, it is not directly associated with the Cleanup Action. The redevelopment will be completed under separate process and will be required to comply with any environmental restrictive covenants that will be established as part of the Cleanup Action.

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

https://fortress.wa.gov/ecy/gsp/Sitepage.aspx?csid=2279

- Georgia Pacific West Agreed Order No. 6834 (as amended);
- Bellingham Bay Comprehensive Strategy Final Environmental Impact Statement, dated October 2000;
- Final Environmental Impact Statement (FEIS) - The Waterfront District Redevelopment Project (Formerly Known as New Whatcom), dated July 2010;
- Interim Action Pre-Design Investigation Report – Georgia Pacific West Site, prepared by Aspect Consulting, April 28, 2011;
- Interim Action Work Plan – Georgia Pacific West Site, prepared by Aspect Consulting, August 23, 2011;
- Environmental Impact Statement Addendum - The Waterfront District Redevelopment Project, dated December 2012;
- Bunker C Tank Interim Action Report – Georgia Pacific West Site, prepared by Aspect Consulting, February 24, 2012;
- Final Remedial Investigation – Georgia Pacific West Site, prepared by Aspect Consulting, August 5, 2013
- Draft Feasibility Study, Pulp/Tissue Mill Remedial Action Unit, Vol. 2a of RI/FS – Georgia Pacific West Site, prepared by Aspect Consulting, May 2, 2014
- Draft Cleanup Action Plan, prepared by Washington State Department of Ecology (Ecology), 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.

   Yes. The Port of Bellingham has submitted a Joint Aquatic Resources Permit Application to the US Army Corps of Engineers (USACOE) for the Whatcom Waterway MTCA cleanup on October 31, 2012. The Whatcom Waterway cleanup project is being conducted under a Consent Decree with the Washington State Department of Ecology and includes a number of actions not directly affecting the property covered in the Pulp and Tissue Mill Cleanup Action. However, one area shoreline improvements, referred to as the "shoreline cutback" area (Figure 2), will be conducted as part of the Whatcom Waterway cleanup action. The Whatcom Waterway cleanup action is currently pending approval from the USACOE to utilize a Nationwide 38 permit.

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

    The Cleanup Action will be conducted under a Consent Decree between the Port of Bellingham and Ecology in accordance with the Model Toxics Control Act (MTCA). Under MTCA, the Cleanup Action will be exempt from procedural requirements of state and local permits but must comply with the permit substantive requirements. A list of permits that are anticipated to be applicable to the project are presented below.

    Local Approvals/Permits:

    - **City of Bellingham Shoreline Substantial Development Permit (Bellingham Municipal Code [BMC] Title 22.05):** Pursuant to the City of Bellingham Shoreline

Master Program (Bellingham Municipal Code [BMC] Title 22), the cleanup action must meet the requirements of a City Shoreline Substantial Development Permit (SMP). The cleanup action will occur within the regulated shoreline area designated by BMC Title 22 as Waterfront District – Shoreline Mixed Use. The substantive requirements include meeting the general conditions for a SMP, requirements and conditions of the Waterfront District – Shoreline Mixed Use shoreline designation, and applicable general regulations and use activity policies.

- **City of Bellingham Fill and Grade Permit (BMC Title 16.70):** Pursuant to the City of Bellingham Grading Ordinance (BMC 16.70), a Major Grading permit is required from the City for grading projects that involve more than 500 cubic yards of grading. The City grading ordinance identifies a number of standards and requirements for obtaining a grading permit. The City standards and requirements will be integrated into the construction plans and specifications where applicable for the cleanup action to insure it complies with the substantive requirements of the City grading ordinance. Those substantive requirements include: staking and flagging property corners and lines when near adjacent properties, location and protection of potential underground hazards, proper vehicle access point to prevent transport of soil off-site, erosion control, work hours and methods compatible with weather conditions and surrounding property uses, prevention of damage or nuisance, maintaining a safe and stable work site, compliance with noise ordinances and zoning provisions, development of a traffic plan when utilizing City streets and written permission when grading from legal property owner.

- **City of Bellingham Construction Stormwater Permit (BMC Title 15.42):** Pursuant to the City of Bellingham Stormwater Management ordinance (BMC 15.42), the cleanup action must meet the requirements of a City Stormwater Permit. The substantive requirements include preparation of a stormwater site plan, preparation of a construction stormwater pollution prevention plan, source control of pollution, preservation of natural drainage systems and outfalls, on-site stormwater management, run off treatment, flow control, and system operations and maintenance.

- **City of Bellingham Critical Area Ordinance (BMC Title 16.55.420):** Critical area substantive requirements are applied to land development activities in the City of Bellingham. The cleanup action will occur on land designated by the City of Bellingham as having "erosion" and "landslide" hazards as well as a range of seismic hazards from "very high" to "low". The substantive requirements associated with BMC 16.55.420 include an assessment or characterization of the hazard areas which may include a hazard analysis and geotechnical engineering report by a licensed professional.

State Approvals/Permits:

- **Department of Ecology National Pollutant Discharge Elimination System (NPDES) Construction General Permit:** The cleanup action will require a National Pollution Discharge Elimination System (NPDES) Construction Stormwater General Permit. Ecology administers the federal NPDES regulations in Washington State. All construction permits that disturb more than 1 acre during construction must obtain a NPDES construction stormwater permit. The NPDES permit program is delegated to Washington State by the federal Environmental Protection Agency under the federal Clean Water Act, § 1251 et seq. Pursuant to RCW 70.105D.090(2), Ecology has determined that the procedural requirements of an

NPDES permit are not exempt for MTCA actions. The Cleanup Action will be conducted under the requirements of an NPDES Construction Stormwater General Permit issued separately by Ecology.

- **Department of Ecology NPDES Waste Discharge Permit:** The Port currently operates the Aerated Stabilization Basin (ASB) under an individual NPDES Waste Discharge Permit (Permit No. WA0001091). It is anticipated that management of Site stormwater and construction-related dewatering water will be routed to the ASB for treatment. The Port will comply with all requirements of the NPDES Waste Discharge permit and any subsequent modifications.

Federal Approvals/Permits (the Cleanup Action is not exempted from any required federal permits or approvals):

- None

11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (You may attach a page if this space is not adequate.)

The Georgia-Pacific West Site is a waterfront industrial property acquired by the Port of Bellingham from Georgia-Pacific Corporation in January 2005. The Site, located at 300 West Laurel Street in Bellingham, Washington, encompasses approximately 75 acres on the south side of the Whatcom Waterway. A Pulp and Tissue Mill operated at the Site from 1926 through 2007. The project subject to this SEPA checklist is the Cleanup Action for the 31 acre Pulp and Tissue Mill Remedial Action Unit as shown on Figure 1.

The Pulp and Tissue Mill was historically manufactured bleached sulfite pulp for internal production of tissue and toweling, and for sale as market pulp. The facility contained six individual plants producing primary sulfite pulp, Permachem pulp, sulfuric acid, chlorine, sodium hydroxide, alcohol, and lignosulfonate products. Sulfite waste liquor, a byproduct of pulping, was converted into ethanol and salable lignin products. Lignin, a byproduct of pulping, was converted into salable products through various production steps. These historic operations have resulted in the release of hazardous chemicals which are required to be addressed under MTCA.

The Cleanup Action has identified the following specific goals for protecting human health and the environment:

- Prevent direct contact with, and erosion of, impacted soils throughout the RAU, which includes known contaminated soils within the Bunker C, Dioxin-Contaminated Debris, and Acid Plant subareas;
- Meet groundwater cleanup levels throughout the RAU;
- Within the Bunker C subarea, prevent direct contact with TPH/cPAH-contaminated soils, and prevent the accumulation of NAPL for groundwater protection;
- Within the Dioxin-Contaminated Debris subarea, prevent direct contact with, and erosion of, dioxin/furan-contaminated soils; and
- Within the Acid Plant subarea, prevent direct contact with, and leaching of, metals-contaminated soils.

The Cleanup Action is described below and is presented in detail in the Draft Cleanup Action Plan prepared by the Washington State Department of Ecology (June 2014). The selected cleanup action is presented on Figure 2. The cleanup action consists of the following elements:

Soil Removal from the Bunker C Subarea. The cleanup action includes removal of all remaining soils with total petroleum hydrocarbons at concentrations exceeding 10,000 mg/kgfrom the Bunker C subarea. These soils have an estimated in-place volume of 2,000 cubic yards (CY).

RAU-wide Capping. Capping to control soil direct-contact exposure and soil erosion pathways will consist of a combination of existing pavement and building foundations, new buildings and pavement, and new soil caps.

New hard caps will be composed of a minimum 3 inches of concrete, asphalt, paving blocks, or building foundations. New soil caps will be composed of a minimum 24 inches of uncontaminated soil cover with a geotextile separation layer to distinguish the capping material from the underlying soil.

Monitored Natural Attenuation (MNA) of Groundwater. MNA will be applied to address residual contamination in groundwater that exceeds applicable groundwater cleanup levels. Contaminants are expected to continue to naturally attenuate through a combination of sorption, bioattenuation, volatilization, dispersion, and tidal mixing. The RI data indicate that natural attenuation is effectively reducing concentrations of groundwater contaminants in each of these areas.

Institutional Controls. Institutional controls and environmental covenants will be a component of the Cleanup Action. It is anticipated that institutional controls will:

- Provide notification regarding the presence of residual contaminated materials, and regulate the disturbance/management of those materials and the cleanup action components;
- Prohibit activities such as utility excavations or site grading that could cause preferential pathways for contaminant migration or run-off and sediment impacts to Whatcom Waterway;
- Prohibit extraction of groundwater for drinking or any other use; and
- Provide for long-term monitoring and stewardship of the cleanup action

12. Location of the Proposal:

The approximately 31 acre Pulp and Tissue Mill RAU site is located within the City of Bellingham limits. The property is situated within portions of Sections 25, Township 38N, Range 02E and Section, 30, Township 38N, Range 03E of the Willamette Meridian.

Latitude: 48.749881 North

Longitude: -122.484247 West

The property is located within the Waterfront District – Commercial Mixed Use and Industrial Mixed Use.

B. ENVIRONMENTAL ELEMENTS

1. EARTH

a. General description of the site:

- ☒ Flat
- ☐ Rolling
- ☐ Hilly
- ☐ Steep Slopes
- ☐ Mountainous
- ☐ Other

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

<5%

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

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

No prime farmland exists on the site.

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

No. However, the site has been identified as a very high seismic hazard area.

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

The cleanup action will include the placement and grading of approximately 22,000 cubic yards of imported fill for capping. Additionally, it is anticipated that approximately nine acres of the site will be regraded, compacted and paved with asphalt. Final details of the capping system, including the source of the imported fill material will be developed in remedial design.

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

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

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

Because the intent of the Cleanup Action is primarily to prevent direct contact with contaminated soils, it is anticipated that an environmental cap will be required throughout the Pulp and Tissue RAU to prevent contact and soil erosion. Capping will include a combination of existing pavement and building foundations as well as future development capping such as buildings, pavement and soil covers. It is anticipated that approximately 80% of the 31 acres (approximately 25 acres) will be capped with an impervious surface of differing types.

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

Due to the flat topography of the site, erosion is not expected to result from the completed project, however during construction, contractors will be required to implement Best Management Practices (BMPs) for erosion control during construction consistent with the Washington State Department of Ecology Stormwater Management Manual for Western Washington. These may include covering stockpiles, use of fabric filter fencing, straw bales, interceptor swales, and/or similar measures. A Stormwater Pollution Prevention Plan will be prepared in accordance with the NPDES Construction General Permit that will be required for the project.

2. **AIR**

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

Short-term emissions to the air would result from diesel and gasoline automobile/equipment exhaust during construction. Although dust generation will likely be limited since some construction activities may occur during the wet season with materials at or above optimum moisture, the contractor will be prepared to implement dust suppression BMPs including, but not limited to covering and/or wetting if necessary.

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

No.

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

Standard construction equipment will be utilized. During site preparation and construction, contractors will take reasonable precautions to minimize dust emissions. Contractors will be required to cover any temporarily staged or stockpiled soil generated during excavation of the Bunker C area and loads will required to be covered during transport to disposal facilities.

3. **WATER**

a. Surface:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)?

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

The cleanup action location is adjacent to Bellingham Bay.

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

Yes. The project includes the excavation of approximately 2,000 cubic yards of TPH impacted soil within 200 feet of the Whatcom Waterway in the northern portion of the site (Figure 2). No work will occur in or over the water.

3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

No material will be placed in surface water or wetlands.

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

No.

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

No.

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

Potential discharges to surface water during the cleanup action could include leakage of petroleum products (fuel, oil, grease, hydraulic fluid, lubricants etc.) from equipment and could enter water in stormwater runoff. Best management practices (BMPs) will be in place to minimize and control potential surface water discharges during construction.

Post construction site conditions will not generate any waste materials that could discharge to surface waters.

b. Ground:

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

No ground water will be withdrawn from a well for drinking water purposes. As part of the cleanup action, restrictive covenants will explicitly restrict the use of site groundwater for drinking water purposes. Groundwater may be required to be extracted from the Bunker C excavation area to allow for excavation of overlying contaminated soil. Approximately 100,000 gallons may be extracted and discharged to

the Aerated Stabilization Basin (ASB) under an NPDES Waste Discharge Permit. The ASB is currently sealed with no discharge to Bellingham Bay.

No water will be discharged to groundwater.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

N/A.

c. Water Runoff (including storm water):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

During construction activities, storm water will be treated on site through various BMPs until the site is stabilized. A Temporary Erosion and Sediment Control (TESC) plan will be developed and implemented throughout construction to minimize potential impacts associated with sediment and erosion. Temporary construction BMPs will include both source-control BMPs and treatment BMPs. All stormwater will be collected and managed through existing facilities which drain to the ASB. No additional volume is anticipated or re-routed by this project.

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

It is possible that accidental spills from trucks or construction equipment could enter surface and/or groundwater during construction. However, spill response measures will be available on site during project construction and implemented in the event of a spill.

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

The cleanup action will include capping and grading of the site but will not alter or otherwise affect drainage patterns in the vicinity of the site.

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

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

4. PLANTS

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

☐ Deciduous tree: alder, maple, aspen, other: Alder

- ☐ Evergreen tree: fir, cedar, pine, other:
- ☒ Shrubs
- ☐ Grass
- ☐ Pasture
- ☐ Crop or grain
- ☐ Wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other:
- ☐ Water plants: Macroalgae, eelgrass
- ☐ Other types of vegetation:

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

Grading and capping associated with the Cleanup Action will remove any existing vegetation (shrubs, grass and blackberry bushes) within the footprint of the cleanup action area.

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

None are known. See Waterfront District FEIS.

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

None.

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

None are known.

5. **ANIMALS**

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

Birds:

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

Mammals:

- ☒ Deer,
- ☐ Elk,
- ☐ Bear,
- ☐ Beaver;
- ☒ Other: Otter, Harbor Seal

Fish:

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

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

Table 1 details Endangered Species Act (ESA)-listed species that may potentially occur in the vicinity of the project. As an upland site, it is not anticipated that these species would be present at the project site, but may be present in adjacent Whatcom Waterway and Bellingham Bay.

Table 1
ESA-listed Species Potentially in the Vicinity of the GP West Pulp & Tissue RAU Cleanup Action

Species	Status	Agency	Critical Habitat Status
Chinook salmon (*Oncorhynchus tshawytscha*) Puget Sound ESU	Threatened	NMFS	Designated
Steelhead (*Oncorhynchus mykiss*) Puget Sound DPS	Threatened	NMFS	Under development
Bull trout (*Salvelinus confluentus*) Coastal Puget Sound DPS	Threatened	USFWS	Designated
Bocaccio (*Sebastes paucispinus*) Georgia Basin DPS	Endangered	NMFS	None proposed or designated
Yelloweye rockfish (*Sebastes ruberrimus*) Georgia Basin DPS	Threatened	NMFS	None proposed or designated
Canary rockfish (*Sebastes pinninger*) Georgia Basin DPS	Threatened	NMFS	None proposed or designated
Killer whale (*Orcinus orca*) Southern Resident DPS	Endangered	NMFS	Designated
Humpback whale (*Megaptera novaeangliae*)	Endangered	NMFS	None proposed or designated
Steller sea lion (*Eumetopias jubatus*)	Threatened	NMFS	None in Washington State
Marbled murrelet (*Brachyramphus marmoratus*)	Threatened	USFWS	Designated – none in action area

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.

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

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

The Cleanup Action is being conducted as a remedial action to address site contamination. Long-term improvements to groundwater quality will improve and enhance adjacent surface water quality.

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

No known invasive animal species are present on or near the site.

6. ENERGY AND NATURAL RESOURCES

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

No long-term energy needs required for completed project, however fossil fuels and electric power will be required for the construction phase of the Cleanup Action.

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

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

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

7. ENVIRONMENTAL HEALTH

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

Potential discharges to surface waters during the cleanup project could include accidental spills or leakage of petroleum products from construction equipment. In addition, while the Cleanup Action is under construction contractors and site workers could be exposed to site contaminants described below. The contractor will be required to prepare a site specific health and safety plan for work in areas where contaminated soils or groundwater may be encountered.

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

Four subareas of contamination have been identified within the Pulp and Tissue Mill RAU. Site contamination is described in detail in the GP West Remedial Investigation prepared by Aspect Consulting, dated August 5, 2013 which are summarized below and shown on Figure 2:

- Bunker C subarea (petroleum hydrocarbons);
- Dioxin-Contaminated Debris subarea;
- Acid Plant subarea;
- LP-MW01 subarea (within the former Lignin Plant);
- Soil throughout the Pulp/Tissue Mill RAU as containing scattered contaminant concentrations exceeding soil screening levels for unrestricted land use; and
- Miscellaneous areas of Groundwater Contamination.

Bunker C Subarea

Within the Bunker C subarea residual soil TPH concentrations exceed both the 3,100 mg/kg soil screening level based on unrestricted (residential) direct contact exposure and, in several locations, the 10,000 mg/kg soil screening level based on groundwater protection (Section 7.6 of RI).

Soil naphthalene concentrations in selected subarea locations exceed the unrestricted soil screening level, which is based on leachability to groundwater. However, detected naphthalene concentrations in subarea groundwater were below the most stringent groundwater screening level, providing an empirical demonstration of groundwater protection. Concentrations of cPAHs exceeding the unrestricted soil screening level (based on direct contact) are common throughout the subarea, as they are throughout the entire RAU.

Dioxin-Contaminated Debris Fill Subarea
Soil within the 4- to 8-foot depth interval from boring BH-SB02, located on the east side of the former Baghouse, contains debris (e.g., plastic) and total dioxins/furans concentrations above the soil screening level based on direct contact exposure for an unrestricted (residential) land use. The proportions of individual dioxin and furan congener concentrations in the debris fill are distinctly different relative to all other Site soil samples analyzed. The detected total dioxin/furan concentration in the debris fill is below the screening level that is protective of leachability to groundwater; therefore, debris fill does not represent a contaminant source to groundwater (Section 7.9.2 of RI).

Acid Plant Subarea
Soil within the former Acid Plant footprint (source area for acidic releases) contains concentrations of arsenic, cadmium, copper, mercury, and lead exceeding soil screening levels based on groundwater protection. The arsenic and lead concentrations in the upper 2 feet of soil also exceed soil screening levels based on unrestricted direct contact exposure. Soil pH within the source area is acidic but meets screening levels for unrestricted use (Section 7.7 of RI).

Groundwater in this subarea contains dissolved arsenic, cadmium, copper, nickel, and zinc concentrations that exceed groundwater screening levels based on marine protection. In addition, the groundwater pH is below the lower limit of the screening level range.

LP-MW01 Subarea
The chlorinated solvent volatile organic compounds (VOCs) vinyl chloride (VC) and tetrachloroethene (aka perchloroethene or PCE) are detected in groundwater from well LP-MW01 at concentrations above groundwater screening levels based on marine protection.

RAU-Wide Soil
Fill Unit soils throughout the Site, and in the Pulp/Tissue Mill RAU specifically, contain scattered occurrences of contamination at concentrations above soil screening levels for unrestricted land use (Section 7.10 of RI). The Cleanup Action assumes all Fill Unit soils at any location within the RAU may contain concentrations of contaminants exceeding soil screening levels for an unrestricted land use.

Groundwater
Dissolved metals (e.g., arsenic, copper, nickel) concentrations in Fill Unit groundwater exceed marine-based screening levels at selected monitoring wells located away from obvious sources for metals contamination (Section 7.9.1 of RI). The RI data indicate that these dissolved metals concentrations are attributable to Site-wide geochemically reducing groundwater conditions that enhance mobility of naturally occurring metals in the Fill Unit aquifer. The reducing groundwater conditions are attributable to the prevalence of organic-rich dredge fill with abundant wood that comprises the Fill Unit; such conditions are typical of man-made (filled) lands throughout the developed shorelines of Puget Sound.

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 objective of the Cleanup Action is to address historical contamination described above. The contaminants described above will not affect project development and design. No known underground hazardous liquid or gas transmission pipelines are located within the project area.

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.

Typical construction related chemicals (fuel, lubricants, cleaning equipment, etc.) will be utilized during construction activities are underway. Following completion of the construction activities no toxic or hazardous chemicals will be stored, used or produced.

4) Describe special emergency services that might be required?

None are anticipated.

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

The objective of the Cleanup Action is to address historical contamination and to protect human health and the environment. The Cleanup Action has identified the following specific goals for protecting human health and the environment:

- Prevent direct contact with, and erosion of, impacted soils throughout the RAU, which includes known contaminated soils within the Bunker C, Dioxin-Contaminated Debris, and Acid Plant subareas;
- Meet groundwater cleanup levels throughout the RAU;
- Within the Bunker C subarea, prevent direct contact with TPH/cPAH-contaminated soils, and prevent the accumulation of NAPL for groundwater protection;
- Within the Dioxin-Contaminated Debris subarea, prevent direct contact with, and erosion of, dioxin/furan-contaminated soils; and
- Within the Acid Plant subarea, prevent direct contact with, and leaching of, metals-contaminated soils.

During construction activities, standard handling procedures and BMPs will be in place and conducted in accordance with MTCA site requirements. Contractors will be required to develop and comply with a site-specific Health and Safety Plan, including appropriate Hazardous Waste Operations and Emergency Response (HAZWOPER) training. Following completion of the Cleanup Action institutional controls will be put in place to ensure the integrity and protectiveness of the cleanup is maintained.

b. **Noise**

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

Existing noise will not affect the project.

2) What types and levels of noise would be created by or associated with the project on a short-term or long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Typical construction noise from vehicles and equipment would be expected on a short-term basis during daytime hours while construction activities are occurring. Local regulations will be adhered to during construction. No long-term noise is anticipated from this project.

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

Equipment will be appropriately sized for operations needed and running only when necessary. Construction activities will be performed in accordance with local regulations for noise and will obtain site-specific variances as necessary.

8. **LAND AND SHORELINE USE**

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

The site and adjacent properties are vacant former industrial properties. The BNSF Railway mainline bounds the eastern and southern portion of the site. The Cleanup Action will not affect current land uses on nearby or adjacent properties.

b. Has the 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?

No.

c. Describe any structures on the site.

There are currently a number of vacant structures on the site that were utilized by Georgia-Pacific when the pulp and tissue plant was in operation. The remaining structures include the following:

- Barking and Chipping Plant;
- Boardmill Building;
- Digester Building;
- Alcohol Plant;
- High Density Tanks;
- Clarifier, and
- Granary Building

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

It is not anticipated that any structures will be demolished as part of the Cleanup Action. However, the clarifier is currently scheduled for demolition as part of the Whatcom Waterway cleanup and this upland work may be coordinated with Pulp and Tissue Mill Cleanup Action for project efficiencies.

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

Commercial Mixed Use and Institutional Mixed Use

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

Industrial/Waterfront Mixed-Use

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

Waterfront District Shoreline Designation – Shoreline Mixed Use

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

As noted in above in Section B.1.d (Earth) the project area has been identified as a very high seismic hazard area.

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

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

N/A

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

N/A

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

N/A

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

The Cleanup Action is consistent with the Port and City land use presented in the Waterfront District Sub-Area Plan (Port/City 2013). The project will complete the environmental cleanup of historical contamination and will be designed to be compatible and not interfere with the development and construction of a waterfront park and mixed use development which will be implemented as separate projects.

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

N/A

9. **HOUSING**

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

N/A.

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

N/A.

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

N/A.

10. **AESTHETICS**

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

No structures are proposed as part of the Cleanup Action.

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

None.

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

N/A.

11. **LIGHT AND GLARE**

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

No light or glare is anticipated to be associated with the Cleanup Action. It is currently anticipated that construction activities will occur during normal daytime working hours.

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

No.

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

None.

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

N/A.

12. **RECREATION**

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

No recreational opportunities are currently available at the site. Access to the site is currently restricted due to historical contamination and public safety concerns. The

adjacent waters of Bellingham Bay are used by recreational boaters and small personal watercraft such as kayaks etc. Moorage is not available at the site.

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

No.

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

The project site currently does not support recreation. The Cleanup Action will address historical contamination to protect human health and the environment. The proposed project will enhance public access to the site by completing cleanup to allow subsequent redevelopment as a public park. Following completion of the Cleanup Action, the site is planned for transition to a mixed use and public park under the Waterfront District Sub-Area Plan. The City of Bellingham is currently underway with park master planning.

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.

As described in the historic and cultural resources evaluation described in the Waterfront District FEIS, none of the structures located on the site are listed on the National Register of Historic Places, the Washington Historic Register, or the Bellingham Local Landmark Registry. However it is anticipated that the remaining structures listed in Section 8.c may be eligible for listing.

b. Are there any landmarks, features, or other evidence of Indian or historic use 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 historic and cultural resources evaluation described in the Waterfront District FEIS did not identify any known national, state, or local preservation registers on or next to this site. However, the area comprising the site historically consisted of tide flats and shoreline along historic Whatcom Creek alignment and the base of the original bluff. Dating back from pre-history to the 19th century, the Bellingham waterfront, (including the vicinity of the project site) was traditionally occupied by ancestors of the present-day Lummi Nation and Nooksack Indian Tribe (FEIS, Appendix M). The settlement and subsistence of communities throughout this region were similar in many ways, primarily in the seasonal cycle of congregation at winter villages. Winter villages were usually located along protected coastlines, where activities such as shellfish gathering and fishing could be pursued. European settlement occurred in and around Bellingham Bay during the 1850s.

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.

As described in the FEIS, Appendix M, the assessment of the potential for archaeological resources in the project area was derived from analysis of archival and historic records, photos and maps, and a summary review of geotechnical data available from recent and ongoing projects in the vicinity. The assessment also included review of records filed with the Washington State Dept. of Archaeology and Historic Preservation (DAHP), historic maps and photos from the Center for Pacific Northwest Studies, the Whatcom Museum of History and Art, the Whatcom County Historical Society, the Pacific Northwest Digital Collections at the University of Washington.

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 Cleanup Action includes the excavation and regrading of soil that will primarily occur in Fill Unit soil overlying the former tide flats. With the exception of the Bunker C excavation area, it is anticipated that ground disturbances will be limited to the upper 2 to 4 feet of the existing grade and will consist primarily of regrading imported fill material. Prior to the construction project, a Cultural Resources Management Plan will be developed detailing procedures and protocols for unanticipated discoveries of cultural resources for use during construction activities.

14. **TRANSPORTATION**

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

The site is accessible by Central Avenue. Central Avenue and Roeder Avenue will be utilized for access during project construction.

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

Yes. The site is located approximately 0.5 miles from a Whatcom Transit Authority stop near the intersection of Holly Street and Central Avenue.

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

None.

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

No.

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

No.

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

As a short-term project, vehicle trips will be limited to transport and disposal of excavated contaminated soil plus the import of fill material brought to the site as part of the Cleanup Action. Based on the anticipated volume of material to be imported, it is expected that during construction up to 15 truck trips per day will be generated. In addition, construction workers would likely generate up to 10 passenger vehicle trips per day and up to 5 peak hour trips. Due to the short-term nature of the project, no transportation modeling was conducted. Rather, best professional judgment based on recently completed site-specific projects was used to estimate project related trip information.

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

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.

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

Truck traffic will be routed through the vacant former GP Mill property directly to the designated City approved truck route. During construction, onsite parking will be available to contractors. Following completion of the Cleanup Action, vehicular traffic is not anticipated to change as a result of the project.

15. **PUBLIC SERVICES**

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

No.

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

N/A

16. **UTILITIES**

a. Check utilities currently available at the site:

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

b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None.

SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: _____

Date Submitted: 6/3/2014

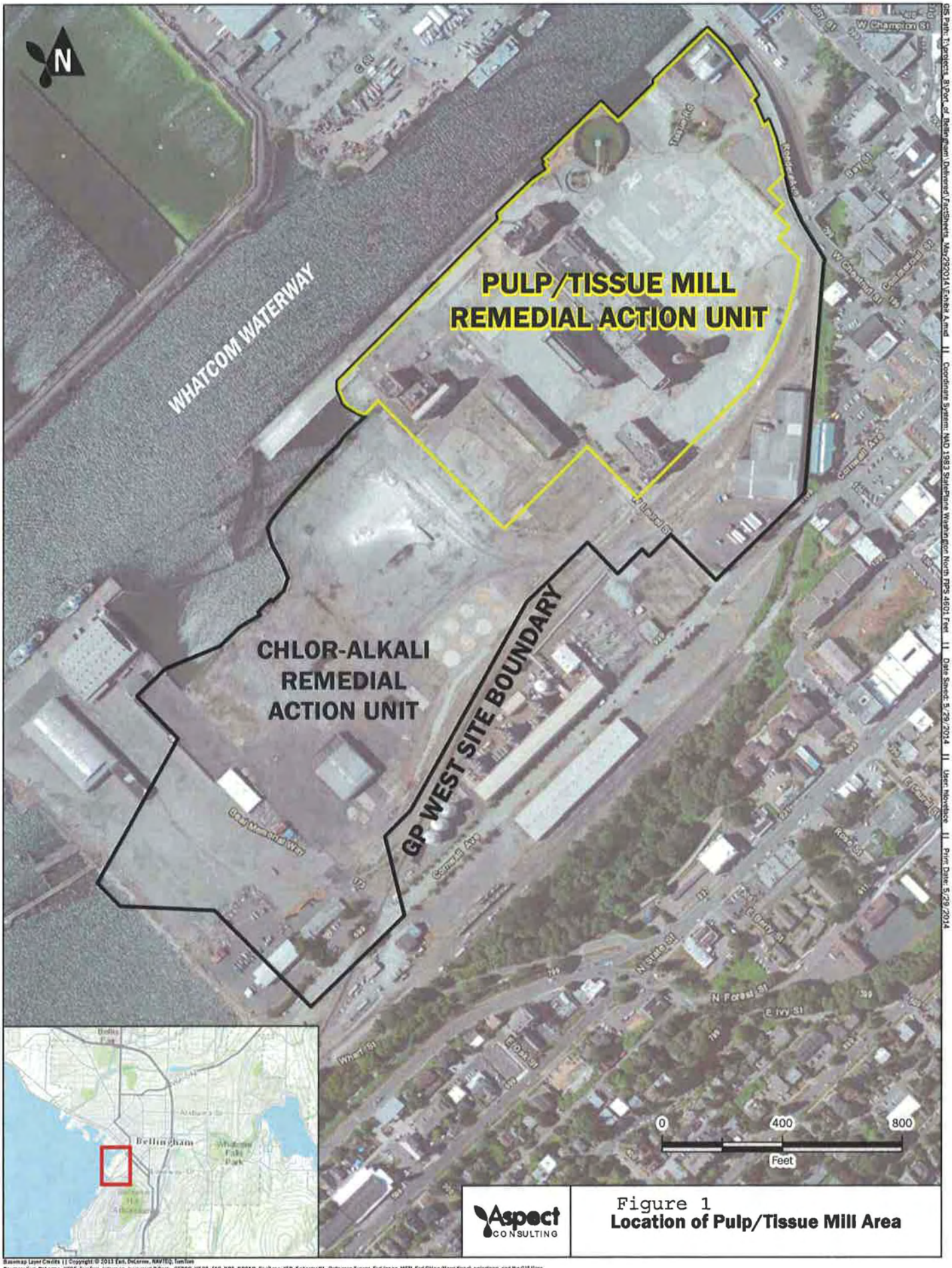


Figure 1
Location of Pulp/Tissue Mill Area

Aspect CONSULTING

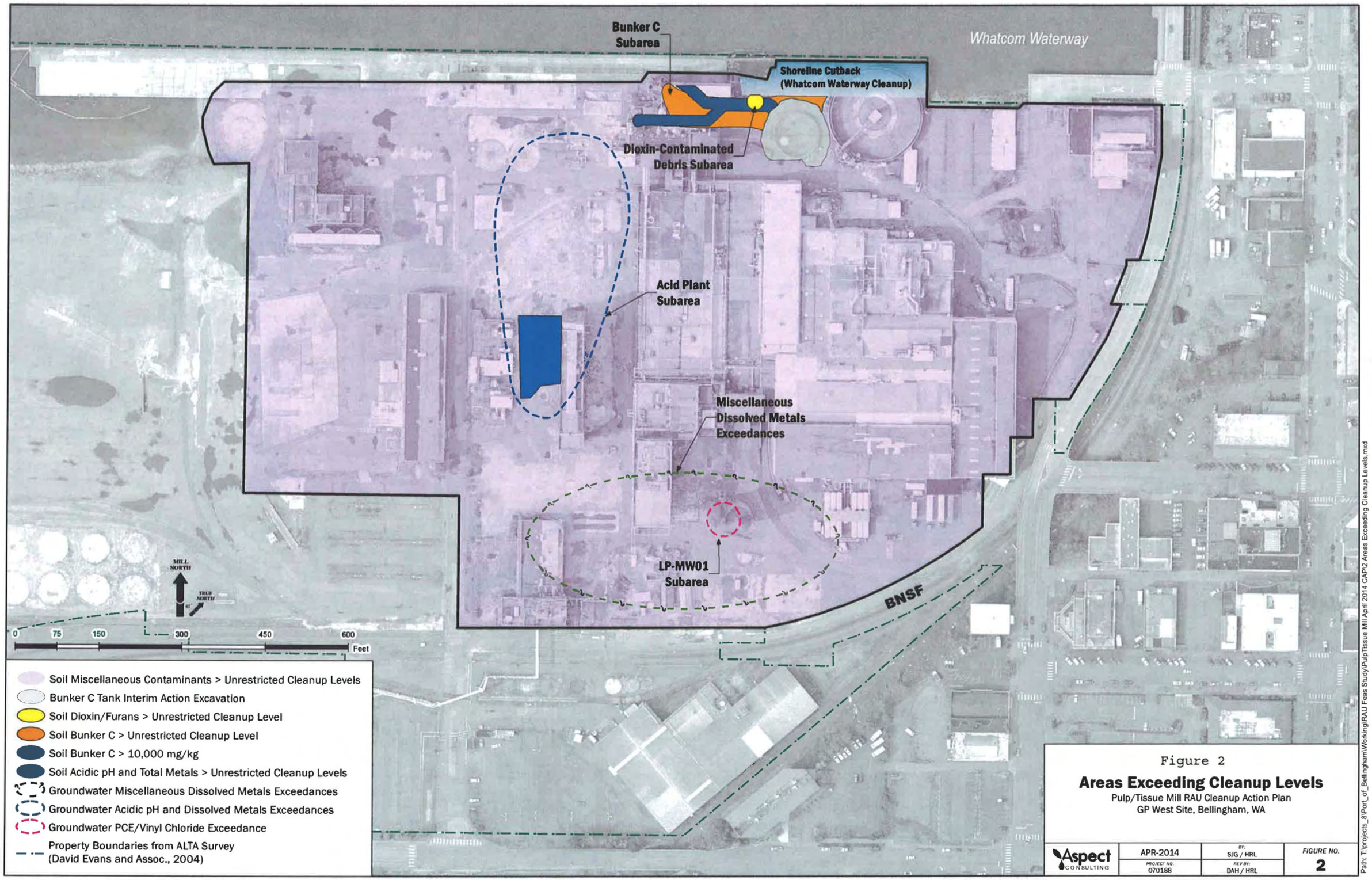


Figure 2

Areas Exceeding Cleanup Levels

Pulp/Tissue Mill RAU Cleanup Action Plan
GP West Site, Bellingham, WA

Aspect CONSULTING	APR-2014	BY: SJG / HRL	FIGURE NO. 2
	PROJECT NO. 070188	REV BY: DAH / HRL	

Path: T:\projects_8\Port_of_Bellingham\Working\RAU Feas Study\Pulp Tissue Mill April 2014 CAP\2 Areas Exceeding Cleanup Levels.mxd

Whatcom Waterway

BNSF

MILL NORTH

TRUE NORTH

0 60 120 240 360 480 Feet

- Capping and use restrictions
- 2011 Interim Action
- Petroleum contaminated soil removal
- Groundwater Contamination to be Monitored
- Property Boundaries from ALTA Survey (David Evans and Assoc., 2004)
- Whatcom Waterway Site Cleanup-Shoreline Cutback and Cap

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Figure 3
Proposed Cleanup Action
Pulp/Tissue Mill Areas

Path: T:\projects_0\Port_of_Bellingham\Delivered\FactSheets_May292014\Proposed Cleanup Action Areas.mxd