



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave. SE • Bellevue, Washington 98008
(425) 649-7000 • FAX (425) 649-7161

DETERMINATION OF NONSIGNIFICANCE (DNS)

Description of proposal: The proposed action is an interim cleanup action (Interim Action) on a portion of the Harris Avenue Shipyard MTCA cleanup site (Site) to be conducted under an amended Agreed Order between the Port of Bellingham (Port) and the State of Washington Department of Ecology (Ecology). The Interim Action will address contaminated soil and marine sediment to preliminary media-specific remedial action levels. The Port is currently preparing a remedial investigation and feasibility study (RI/FS) for the final cleanup of the entire Site. Final media-specific cleanup standards will be presented in the final RI/FS. The Interim Action cleanup is scheduled to be completed within 2-years from July 2015. The scope of the Interim Action is described in more detail in the Interim Action Work Plan, an exhibit to the amended Agreed Order that is concurrently available for public review and comment along with this SEPA threshold determination.

Proponent: Port of Bellingham

Location of proposal, including street address, if any: The Harris Avenue Shipyard is located at 201 Harris Avenue in the Fairhaven District of Bellingham, Washington. The approximately 10-acre Harris Avenue Shipyard MTCA Site consists of approximately 5-acres of upland and 5-acres of sediment. The Shipyard property is situated within Section 2, Township 37 North, Range 2 East of the Willamette Meridian.

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.

This DNS is issued under WAC 197-11-340(2) (see also WAC 197-11-268(1)); the lead agency will not act on this proposal for a minimum of 15 days from the date below. Comments must be submitted by April 8, 2015.

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

Position/title: Section Manager/Toxics Cleanup Program, NWRO **Phone:** (425) 649-7123

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

Date 3/7/2015

Signature _____

Please send comments to:

John Guenther
Department of Ecology, Bellingham Field Office
1440 10th St., Suite 102
Bellingham, WA 98225

ENVIRONMENTAL CHECKLIST

A. BACKGROUND [\[help\]](#)

1. Name of proposed project, if applicable: [\[help\]](#)

Interim Action for the Model Toxics Control Act (MTCA) Cleanup and Associated Structure Adjustments for the Harris Avenue Shipyard Site (Project)

- Amendment to Agreed Order 7342 - Interim Action Work Plan

2. Name of applicant: [\[help\]](#)

Port of Bellingham (Applicant/Responsible Party)

3. Address and phone number of applicant and contact person: [\[help\]](#)

Applicant:

John Hergesheimer, P.E., Port of Bellingham (Applicant/Responsible Party)



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Agent:

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4. Date checklist prepared: [\[help\]](#)

January 15, 2015

5. Agency requesting checklist: [\[help\]](#)

Washington State Department of Ecology (Ecology)

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

7/2015 to 9/2016 per draft IAWP

The proposed Project is expected to begin once all approvals and permits have been received and take up to 2 years to construct. Upland work associated with the proposed Project may commence once all permits and approvals are issued. In-water work will adhere to the allowable in-water

work windows associated with the proposed Project, which are anticipated to be August 1 to February 15 each year.

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 Project is proposed to be conducted by the Port of Bellingham (Port) to implement an interim cleanup action within Bellingham Bay concurrent with the development of a draft Remedial Investigation and Feasibility Study (RI/FS) for the Harris Avenue Shipyard Site (Site) under an Agreed Order between Ecology and the Port. An Ecology-approved amendment to the Agreed Order and Interim Action Work Plan are necessary to conduct the Project. Future proposed cleanup actions will be conducted based on the RI/FS that will be permitted separately at a later date.

the Interim Action

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

The following environmental information has been prepared for the Project:

- Harris Avenue Shipyard Pier Engineering/Predesign Report
- Joint Aquatic Resource Permit Application (JARPA) including project description and attachments
- Biological Assessment (BA)
- Cultural Resources Record Search and Literature Review (Attachment 1)
- Agency Review Draft RI/FS (RI Portions only; Floyd|Snider 2013)

Draft B-Bay Regional Background Sediment Data

October 2000 Bellingham Bay Comprehensive Strategy FEIS

The following environmental information is in development for the Project:

- Historic Structures Record Search and Literature Review

8. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. [\[help\]](#)

No other government approvals for other proposals directly affecting the property covered by this proposal are pending at this time.

9. List any government approvals or permits that will be needed for your proposal, if known. [\[help\]](#)

The Revised Code of Washington (RCW) 70.105D.090 exempts MTCA remedial actions conducted under an Agreed Order from the procedural requirements of RCW chapters 70.94, 70.95, 70.105, 77.55, 90.48, and 90.58, and from any laws requiring or authorizing local government permits or approvals for the remedial action. Ecology will ensure compliance with the substantive provisions

of these chapters and the substantive provisions of any laws requiring or authorizing local government permits or approvals.

The following permits and approvals are being obtained for the Project:

- U.S. Army Corps of Engineers (USACE)—Nationwide Permit 38
- Ecology—Coastal Zone Management Act Consistency Determination. Additionally, the project must comply with Ecology's 401 Water Quality Certification General Conditions.

10. 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 Port, under an amendment to an Agreed Order with Ecology, is proposing an Interim Action under MTCA. The Project is planned to be conducted by the Port to implement upland and in-water cleanup actions within Bellingham Bay concurrent with the development of a draft RI/FS for the Site. The Port is developing the draft RI/FS under Ecology's direction. Permitting for in-water work is anticipated to occur via a Nationwide Permit 38 for the Cleanup of Hazardous and Toxic Waste by the USACE. The proposed cleanup action is being performed in compliance with the requirements of MTCA and Sediment Management Standards (SMS) regulations. The Project is located at the Harris Avenue Shipyard along the waterfront of Bellingham Bay in Whatcom County, Washington. ✓

The Project involves both in-water sediment cleanup and upland soil cleanup. The cleanup of sediment units (SUs) will occur through a combination of dredging, excavation, upland disposal, and backfilling with clean material and structure removal as both a source control measure under MTCA and as a necessary step to perform a more permanent remedy under MTCA (i.e., sediment removal as opposed to in-place sediment containment via capping). Ecology has not made a final decision on the MTCA cleanup, but has expressed support for the proposed Interim Action.

The in-water portion of the proposed Interim Action will include work within SU-1, SU-2, SU-3A, SU-3B, SU-4A, SU-4B, and a portion of SU-7 (see JARPA Sheet 3 in Attachment 2). SU-1, SU-2, and the portion of SU-7 are located in open water areas. SU-3A is located beneath the wooden portion of the Harris Avenue Pier north of the Carpenter Building and its pier, and SU-3B is located beneath the remaining section of the wooden portion of the Harris Avenue Pier and the Carpenter Building and associated marine railway access walkway on the west edge of the Carpenter Building. SU-4A and SU-4B are primarily located in open water areas, but also include the Western Marine Railway Access Walkway on the western edge of these SUs.

The subject SUs have been grouped into three Remedial Action Management Areas (RMAs) based on the specific types of proposed remedial actions (e.g., backfilling with clean material, dredging) that will occur within the whole or a portion of each SU (see JARPA Sheet 4 in Attachment 2). RMA-A includes SU-1, SU-3A, and the subtidal portion of SU-3B; RMA-B includes SU-2 and the intertidal portion of SU-3B; and RMA-C includes a portion of SU-7. The proposed remedy for RMA-A involves dredging to a clean sediment surface (i.e., meeting regulatory standards) (anticipated to be up to 3 feet below the existing sediment surface) with no backfill, RMA-B involves excavating to approximately 2 feet below the existing sediment surface and backfilling with clean materials to match the existing sediment surface, and RMA-C involves dredging to a clean sediment surface (i.e., meeting regulatory standards; this is anticipated to be 3 feet below the existing sediment surface) with no backfill. It is assumed that sloughage will occur along the outside boundaries of the dredge prism, resulting in an approximately 2:1 slope around the perimeter of the dredge prism. SU-4A and SU-4B are not included in the RMAs because no dredging or excavation actions are proposed in these as part of the proposed Interim Action and cleanup work in these SUs will occur as part of a separate final cleanup action. ✓

Under the Project, cleanup in these areas is anticipated to be conducted after the wooden portion of the Harris Avenue Pier, the Carpenter Building and its pier and walkway, and the Western Marine Railway Access Walkway have been demolished and removed as part of the Interim Action. These existing structures will be removed as part of the cleanup as both a source control measure (i.e., through removal of creosote-treated timber piles) and as a necessary step to perform a more permanent remedy under MTCA. Note that the concrete portion of the Harris Avenue Pier will remain in place, and cleanup in this area will occur in a separate final cleanup action.

Once proposed remedial actions, including structure removal in this area, are complete, the wooden portion of Harris Avenue Pier will be reconstructed in its current footprint using more environmentally friendly materials (e.g., existing creosote-treated timber piles will be replaced by fewer steel piles and the replaced piles will occupy a smaller net footprint than the existing creosote-treated timber piles due to the overall reduction in pile count). The Carpenter Building and its pier will not be replaced, with the exception that the existing Marine Railway Access Catwalk on the west edge of the Carpenter Building pier will be replaced with a stand-alone pile-supported walkway serving the east side of the marine railway. The Western Marine Railway Access Walkway will also be replaced with a pile-supported steel walkway. The replaced Western Marine Railway Access Walkway will be located approximately 8 feet to the west of its current location and the replaced Eastern Marine Railway Access Walkway will be located 4 feet to the east of the existing eastern walkway. The replaced Eastern and Western Marine Railway Access Walkways will be constructed in a manner that the decking and piles can be readily removed if

necessary to accommodate future cleanup actions in these areas. These structures will be removed to accommodate cleanup actions and reconstructed to replace existing functions of the shipyard.

A temporary walkway/utility support structure will be installed on the east side of the Harris Avenue Pier to accommodate access to and from the concrete portion of the Harris Avenue Pier and allow existing utility connections to the pier that are necessary for ongoing operations to remain in place during the Project. Utilities required to support ongoing use of the concrete portion of the Harris Avenue Pier will also be installed during installation of the temporary walkway. The temporary walkway/utility support structure will be removed after the pier replacement is complete and permanent utilities have been connected. Due to safety reasons and the need to maintain utility connections, it is not practicable to access the concrete portion of the Harris Avenue Pier using a vessel.

The existing timber and concrete floats, associated gangway, and gangway platform currently connected to the west side of the main pier will need to be removed during the project work to provide a clear work area for dredging. These will be temporarily relocated to another location within the water operations area of the shipyard to provide required safety and rescue boat access. The floats, gangway, and gangway connecting platform will be relocated to the approximate present location or placed in a similar location and configuration to meet operational needs after the pier construction is complete. See Attachment 2 (Project Description) for additional project details related to the in-water portion of the Interim Action. ✓

The upland portion of the Project will include work in the uplands adjacent to the in-water work as shown on Upland Figure A. The upland proposed Interim Action area is bounded by the Former Arrowac Fisheries property on the east, the side rails and the marine railway on the west, Bellingham Bay on the north, and the gravel surface of the Puglia lease area to the south. The upland work will consist of shallow surface soil excavation (less than 4 feet in depth) below ground surface (bgs) and a focused excavation to approximately 8 to 10 feet bgs in the vicinity of a former aboveground storage tank (AST) and application of a bioremediation amendments, backfilling and gravel re-surfacing.

11. 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 at 201 Harris Avenue in Bellingham, Washington 98225. In-water work will occur on state-owned aquatic lands managed by the Port under a Port Management Agreement (PMA) with the Washington State Department of Natural Resources (WDNR). No tax parcel exists for these aquatic lands. The upland portion of the work will be completed on Port Tenant Parcels A and B, as shown in Upland Figure B. The property is located in the southeast quarter of Section 02, Township 37 North, and Range 2 East. Site plans and a vicinity map are included in Attachment 2. ✓

B. ENVIRONMENTAL ELEMENTS [\[help\]](#)

1. Earth

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

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

The upland portion of the property is generally flat. The bathymetry of the sea floor generally slopes from the shoreline to the subtidal areas of the Site. The steepest slope occurring within the Project area is located at the existing upland vertical retaining wall along the shoreline.

- 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 agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [\[help\]](#)

The soils located beneath the existing asphalt primarily consist of fill material derived from historically dredged sediments and surrounding hill areas, with imported gravel as a base for Site activities and structures. No agricultural soils exist in the vicinity of the proposed Project.

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [\[help\]](#) ✓
There are no surface indicators or history of unstable soils. However, the underlying site is composed primarily of imported fill.

- 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. [\[help\]](#)

The Project will result in environmental cleanup in the Project area. Sediments will be dredged or excavated in RMA-A, RMA-B, and RMA-C as described further in the Project Description (Attachment 2). Additionally, the intertidal areas of RMA-B will be backfilled with clean material. Contaminated dredge material and clean backfill volumes are provided in Table 1.

Table 1
Dredge Material and Clean Backfill Placement

Project Component	Volumes ¹			
	RMA-A	RMA-B	RMA-C	Total
Dredge Material ²	9,600	2,100	3,500	15,200
Clean Backfill				
Total	0	2,100	0	2,100
Sand	0	1,700	0	1,700
Gravel	0	200	0	200
Cobble	0	200	0	200

Notes:

1. All volumes are in cubic yards
2. Dredge materials will be disposed of at an upland landfill or beneficially reused, as directed by Ecology

The proposed uplands Interim Action area is approximately 12,500 square feet in area. Up to 2,000 cubic yards (CY) of contaminated material may be excavated and removed, and an equal volume of clean backfill will be placed in the excavation. The grades within the proposed Interim Action area will remain unchanged post-project.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [help]
Erosion could occur from the Project during dredge/excavation, fill activities, and upland excavation. Best Management Practices (BMPs), including preparation of a Temporary Erosion and Sedimentation Control (TESC) Plan in coordination with Ecology and other applicable agency requirements, will be implemented during Interim Action activities so that any potential erosion from stockpiling and grading, filling, and excavation activities will not contribute to erosion in the area. ✓

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [help]
The Project will result in a reduction of approximately 11,170 square feet of impervious surface with the removal of the Carpenter Building and its pier and the area of existing impervious surfacing on the site will therefore be reduced over current conditions.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [help]
The following BMPs will be employed to reduce or control erosion associated with dredging and in-water excavation:

- Turbidity and other water quality parameters will be monitored to ensure Interim Action activities are in compliance with Washington State Surface Water Quality Standards

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(173-201A Washington Administrative Code [WAC]) and in accordance with the Ecology-issued Water Quality Certification.

- Appropriate BMPs will be employed to minimize sediment loss and turbidity generation during dredging. BMPs may include, but are not limited to:
 - Eliminating multiple bites while the bucket is on the seafloor
 - No stockpiling of dredged material on the seafloor
 - No seafloor leveling
- Depending on the results of the water quality monitoring program, enhanced BMPs may also be implemented to further control turbidity. Enhanced BMPs may include, but are not limited to:
 - Slowing the velocity (i.e., increasing the cycle time) of the ascending loaded clamshell bucket through the water column
 - Pausing the dredge bucket near the bottom while descending and near the water line while ascending
 - Placing hay bales and/or filter fabric on barge (including scuppers) to clear return water
- Barges will be managed such that the dredged sediment load does not exceed the capacity of the barge. The load will be placed in the barge to maintain an even keel and avoid listing.
- Dredge vessel personnel will be trained in hazardous material handling and spill response and will be equipped with appropriate response tools, including absorbent oil booms. If a spill occurs, spill cleanup and containment efforts will begin immediately and will take precedence over normal work. ✓
- The dredging contractor will inspect fuel hoses, oil or fuel transfer valves, and fittings on a regular basis for drips or leaks in order to prevent spills into the surface water.
- The contractor shall be responsible for the preparation of a Spill, Prevention, Control, and Countermeasure (SPCC) Plan to be used for the duration of the Project. The SPCC Plan shall be submitted to the Project Engineer prior to the commencement of any Interim Action activities. A copy of the SPCC Plan, and any updates, will be maintained at the work site by the contractor and will include the following:
 - The SPCC Plan shall identify Interim Action planning elements and recognize potential spill sources at the work site. The SPCC Plan shall outline responsive actions in the event of a spill or release and shall describe notification and reporting procedures. The SPCC Plan shall outline contractor management elements such as personnel responsibilities, Project site security, site inspections, and training. SPCC

- The SPCC Plan will outline what measures shall be taken by the contractor to prevent the release or spread of hazardous materials, either found on site and encountered during Interim Action activities but not identified in contract documents, or any hazardous materials that the contractor stores, uses, or generates on the site during Interim Action activities. These items include, but are not limited to, gasoline, diesel, oils, and chemicals. Hazardous materials are defined in Revised Code of Washington (RCW) 70.105.010 under "hazardous substance."
- The contractor shall maintain at the job site the applicable equipment and material designated in the SPCC Plan.

The following additional BMPs may be used as part of the proposed upland Interim Action work:

- BMPs will be implemented to prevent tracking soil onto paved areas, roadways, and off-site areas. Tracking of soil from active portions of the work area onto other areas of the property or public roads will not be allowed. For earthwork equipment exiting the work area, soil will be removed from the tires and body of trucks and equipment so that it is not deposited outside the work area.
- Dust control methods will be applied as needed to minimize the generation of dust from Interim Action activities and to prevent airborne dust from dispersing into the atmosphere. Water trucks, hoses, or spray nozzles for application of water may be used.
- Workers will follow the decontamination procedures described in the site-specific Health and Safety Plan. Tools, equipment, and heavy machinery that contact contaminated soil must be decontaminated before they contact clean backfill or are taken out of the active work area.
- A TESC plan and water management plan will be prepared and implemented, as necessary. The TESC plan would address methods to install, maintain, and upgrade all erosion prevention, containment, and countermeasure BMPs during Interim Action activities. This would include TESC surface runoff, erosion control measures in open excavation areas, and stockpile management. ✓
- Stockpiles and open excavation areas will be minimized. If contaminated soil is stockpiled on-site instead of being direct loaded for off-site transport and disposal, it would be stockpiled on plastic sheeting, covered with plastic, and secured from wind. Materials to be stockpiled would be contained within an area bermed with a temporary curb.

TESC

2. Air

- a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction, operation, and maintenance when the project is

completed? If any, generally describe and give approximate quantities if known. [\[help\]](#)

Fugitive dust could be generated during dry periods of upland and nearshore Interim Action activities and during demolition of the Carpenter Building. Upland excavation and operation of equipment may result in dust and emissions from equipment within the upland portion of the proposed interim action area during Interim Action activities, and from upland activities associated with dredging, including upland material stockpile management (e.g., moving and loading). Machinery such as cranes, loaders, trucks, and vessels will likely emit exhaust gases. These emissions will be temporary in nature and generally of short duration; therefore, no long-term adverse effects on local air quality are anticipated.

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: [\[help\]](#)

Equipment used on the Project will be maintained in good working order to minimize airborne emissions. BMPs (e.g., application of water as necessary) for dust control will be employed during Interim Action activities.

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 in-water portion of the Project is within Bellingham Bay, as shown in JARPA Sheet 1 in Attachment 2. Bellingham Bay is an embayment of the Salish Sea and accommodates a variety of commercial and recreational uses. No wetlands are located on the property (USFWS 2014b).

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. [\[help\]](#)

The Project includes Interim Action activities in and within 200 feet of Bellingham Bay as shown on the JARPA Sheets in Attachment 2. The Project includes dredging, excavating, demolition, structure replacement (including pile placement), and placement of clean fill. See Attachment 2 (Project Description) for additional project details and JARPA Sheets.

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. [\[help\]](#)

The Project proposes both in-water dredging and clean backfill placement, as shown on JARPA Sheet 4 in Attachment 2. The fill will be sourced from approved borrow sites. Estimated volumes of dredge and fill are shown on Table 1 in the response to B(1)(e) above.

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

The Project will not require surface water withdrawals or diversions.

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

Bellingham Bay, adjacent to the property, is a "Zone AE" floodplain, which indicates areas where "the Base Elevation is the water surface elevation of the 1% annual chance flood." The base flood elevation in this area is determined to be an elevation of 8 feet National Geodetic Vertical Datum of 1929 (FEMA 2004). The property is located within a "Zone X" floodplain which indicate "areas determined to be outside the 0.2% annual chance floodplain" according to the Federal Emergency Management Agency Whatcom County Flood Insurance Rate Maps (FEMA 2004). ✓

- 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. [\[help\]](#)

During Interim Action activities, incidental quantities of waste materials (including diesel fuel and lubricating oils) from accidental leakage from heavy equipment and vehicles could enter surface waters. No waste materials would be discharged to ground or surface water from the completed Project. The Project will include the dredging and removal of contaminated sediment. Marine water quality will be monitored for compliance with Ecology's 401 Water Quality Certification General Conditions.

b. Ground Water:

- 1) Will ground water 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 ground water? Give general description, purpose, and approximate quantities if known. [\[help\]](#)

The Project will not withdraw groundwater, and water will not be discharged to groundwater for drinking water or other purposes.

- 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. [\[help\]](#)

The Project will not discharge waste material into the ground from septic tanks or other sources.

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

Interim Action activities will not affect groundwater drainage patterns in the vicinity of the site.

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. [\[help\]](#)

Stormwater associated with the uplands portion of the proposed Interim Action area is currently routed into both gravel areas that allow for infiltration, and other areas that sheet flow to Bellingham Bay. For paved areas at the facility, the current tenant operates under an individual National Pollutant Discharge Elimination System Waste Discharge Permit (No. WA0031348), and has operational documents in place to ensure environmental compliance. Proper soil and erosion controls will be in place during upland soil excavation activities to prevent stormwater from coming into contact with contaminated soil.

Stormwater from the existing overwater structures sheet flows into Bellingham Bay. Stormwater runoff from the replaced pier will be captured and treated before being released to Bellingham Bay. The determination of treatment flow rates will be based on Ecology guidelines, using the Western Washington Continuous Simulation Hydraulic Model.

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

It is unlikely that waste materials or contaminated soils would enter groundwater or surface waters as a result of the Project. However, there is a chance that a minor fuel spill could occur or that stormwater runoff from stockpiles could result in waste materials entering surface or ground waters during Interim Action activities and site operation. A SPCC Plan and equipment will be available on-site to prevent, prepare for, and respond to any incidental spills that may occur on the property.

- d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any: [\[help\]](#)

The following BMPs will be employed to minimize surface, ground, and runoff water impacts associated with dredging and in-water excavation:

- Turbidity and other water quality parameters will be monitored to ensure Interim Action activities are in compliance with Washington State Surface Water Quality Standards (173-201A WAC) and in accordance with the Ecology-issued Water Quality Certification.
- Appropriate BMPs will be employed to minimize sediment loss and turbidity generation during dredging. BMPs may include, but are not limited to:
 - Eliminating multiple bites while the bucket is on the seafloor
 - No stockpiling of dredged material on the seafloor
 - No seafloor leveling
- Depending on the results of the water quality monitoring program, enhanced BMPs may also be implemented to further control turbidity. Enhanced BMPs may include, but are not limited to, the following:

- Slowing the velocity (i.e., increasing the cycle time) of the ascending loaded clamshell bucket through the water column
- Pausing the dredge bucket near the bottom while descending, and near the water line while ascending
- Placing hay bales and/or filter fabric on barge (including scuppers) to clear return water
- Barges will be managed such that the dredged sediment load does not exceed the capacity of the barge. The load will be placed in the barge to maintain an even keel and avoid listing.
- Dredge vessel personnel will be trained in hazardous material handling and spill response and will be equipped with appropriate response tools, including absorbent oil booms. If a spill occurs, spill cleanup and containment efforts will begin immediately and will take precedence over normal work.
- The dredging contractor will inspect fuel hoses, oil or fuel transfer valves, and fittings on a regular basis for drips or leaks in order to prevent spills into the surface water.
- The contractor shall be responsible for the preparation of a SPCC Plan to be used for the duration of the Project. The SPCC Plan shall be submitted to the Project Engineer prior to the commencement of any Interim Action activities. A copy of the SPCC Plan, and any updates, will be maintained at the work site by the contractor and will include the following:
 - The SPCC Plan shall identify Interim Action planning elements and recognize potential spill sources at the work site. The SPCC Plan shall outline responsive actions in the event of a spill or release and shall describe notification and reporting procedures. The SPCC Plan shall outline contractor management elements such as personnel responsibilities, Project site security, site inspections, and training.
 - The SPCC Plan will outline what measures shall be taken by the contractor to prevent the release or spread of hazardous materials, either found on site and encountered during Interim Action activities but not identified in contract documents, or any hazardous materials that the contractor stores, uses, or generates on the site during Interim Action activities. These items include, but are not limited to, gasoline, oils, and chemicals. Hazardous materials are defined in RCW 70.105.010 under "hazardous substance."
 - The contractor shall maintain at the job site the applicable equipment and material designated in the SPCC Plan.



The following additional BMPs may be used as part of the proposed upland Interim Action work:


- BMPs will be implemented to prevent tracking soil onto paved areas, roadways, and off-site areas. Tracking of soil from active portions of the work area onto other areas of the property or public roads will not be allowed. For earthwork equipment exiting the work area, soil will

be removed from the tires and body of trucks and equipment so that it is not deposited outside the work area.

- Dust control methods will be applied as needed to minimize the generation of dust from Interim Action activities and to prevent air-borne dust from dispersing into the atmosphere. Water trucks, hoses, or spray nozzles for application of water may be used.
- Workers will follow the decontamination procedures described in the site-specific Health and Safety Plan. Tools, equipment, and heavy machinery that contact contaminated soil must be decontaminated before they contact clean backfill or are taken out of the active work area.
- A TESC plan and water management plan will be prepared and implemented, as necessary. The TESC plan would address methods to install, maintain, and upgrade all erosion prevention, containment, and countermeasure BMPs during Interim Action activities. This would include TESC surface runoff, erosion control measures in open excavation areas, and stockpile management.
- Stockpiles and open excavation areas will be minimized. If contaminated soil is stockpiled on-site instead of being direct loaded for off-site transport and disposal, it would be stockpiled on plastic sheeting, covered with plastic, and secured from wind. Materials to be stockpiled would be contained within an area bermed with a temporary curb.

4. Plants [\[help\]](#)

a. Check or circle types of vegetation found on the site: [\[help\]](#)

- deciduous tree: alder, maple, aspen, other
 - evergreen tree: fir, cedar, pine, other
 - shrubs
 - grass
 - pasture
 - crop or grain
 - orchards, vineyards, or other permanent crops
 - wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other
 - water plants: water lily, eelgrass, milfoil, other
 - other types of vegetation
- 

The upland property is almost entirely covered with gravel, with limited sections of concrete pavement around the marine railway. The adjacent shoreline is armored with riprap.

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

No upland vegetation will be removed as part of this Project. Marine vegetation including macroalgae species such as sea lettuce (*Ulva fenestrata*), and other various species could be removed as part of the dredging and excavation activities. These impacts are anticipated to be temporary as marine

vegetation is anticipated to recolonize once the Project is complete. In addition, the Project will provide a net reduction of 9,640 square feet in overwater cover, which has the potential to benefit the growth of marine vegetation.

c. List threatened or endangered species known to be on or near the site. [\[help\]](#)

The U.S. Fish and Wildlife Service identifies the whitebark pine (*Pinus albicaulis*) as occurring within Whatcom County (USFWS 2014a). The property does not contain suitable habitat for whitebark pine.

ESA
Consult.

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

No landscaping or use of native plants is proposed.

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

The upland property is almost entirely covered with gravel, with limited sections of concrete pavement around the marine railway.

5. Animals

a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site: [\[help\]](#)

birds: hawk, heron, eagle, songbirds, other: seabirds
 mammals: deer, bear, elk, beaver, other: harbor seal
 fish: bass, salmon, trout, herring, shellfish, other forage fish

According to the Washington Department of Fish and Wildlife (WDFW) Priority Habitats and Species (PHS) interactive mapping, the Project area is located in a priority Estuarine Zone. Priority species that might be affected by the proposed work include chum salmon (*Oncorhynchus keta*), coho salmon (*O. kisutch*), coastal resident cutthroat (*O. clarkii*), Chinook salmon (*O. tshawytscha*), and Dungeness crab (*Cancer magister*). Documented potential surf smelt (*Hypomesus pretiosus*) and sand lance (*Ammodytes hexapterus*) spawning habitat is located west of the Project area along the Bellingham Bay shoreline and north of the Padden Creek lagoon. A documented purple martin (*Progne subis*) breeding colony exists in the adjacent Padden Creek lagoon. Documented potential surf smelt spawning habitat is also located south of the Project area, along the Bellingham Bay shoreline adjacent to Marine Park. A documented harbor seal (*Phoca vitulina*) haulout area is located west of the Project area and north of the Padden Creek lagoon. Documented bald eagle (*Haliaeetus leucocephalus*) and great blue heron (*Ardea herodias*) breeding areas are located south of the Project area along Lower Padden Creek at the Larrabee Trail (WDFW 2014).

b. List any threatened or endangered species known to be on or near the site. [\[help\]](#)
 See Table 2 for a list of threatened or endangered species.

Table 2
ESA-listed Species and Critical Habitat that May Occur in the Proposed Action Area
and Effect Determinations

Species	Status	Agency	Effects Determination	Critical Habitat Status	Critical Habitat Effects Determination
Chinook salmon (<i>Oncorhynchus tshawytscha</i>) Puget Sound ESU	Threatened	NMFS	NLTAA	Designated	NLTAA
Steelhead (<i>Oncorhynchus mykiss</i>) Puget Sound DPS	Threatened	NMFS	NLTAA	Proposed	N/A
Bull trout (<i>Salvelinus confluentus</i>) Coastal-Puget Sound DPS	Threatened	USFWS	NLTAA	Designated	NLTAA

Species	Status	Agency	Effects Determination	Critical Habitat Status	Critical Habitat Effects Determination
Boccacio (<i>Sebastes paucispinis</i>) Puget Sound/Georgia Basin DPS	Endangered	NMFS	NLTAA	Designated (effective February 11, 2015)	NLTAA
Canary rockfish (<i>Sebastes pinniger</i>) Puget Sound/Georgia Basin DPS	Threatened	NMFS	NLTAA	Designated (effective February 11, 2015)	NLTAA
Yelloweye rockfish (<i>Sebastes ruberrimus</i>) Puget Sound/Georgia Basin DPS	Threatened	NMFS	NLTAA	Designated (effective February 11, 2015)	NLTAA
Killer whale (<i>Orcinus orca</i>) Southern Resident DPS	Endangered	NMFS	NLTAA	Designated	NLTAA
Humpback whale (<i>Megaptera novaeangliae</i>)	Endangered	NMFS	NE	None designated or proposed	N/A
Marbled murrelet (<i>Brachyramphus marmoratus</i>)	Threatened	USFWS	NLTAA	Designated – none in Action Area	N/A

Notes:

DPS = Distinct Population Segment
 ESU = Evolutionarily Significant Unit
 N/A = not applicable
 NE = No Effect

NLTAA = Not Likely to Adversely Affect
 NMFS = National Marine Fisheries Service
 USFWS = U.S. Fish and Wildlife Service

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

Bellingham lies along the Pacific Flyway for migrating waterfowl, so during the migratory season, the Project site could conceivably be frequented by migrating waterfowl. According to the WDFW PHS interactive mapping, salmonids are known to migrate through Padden Creek adjacent to the property (WDFW 2014).

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

No measures are proposed to preserve or enhance wildlife. Implementation of the Project will provide net environmental benefits including the following:

- Removing up to 15,200 cubic yards of contaminated sediment
- Placing up to 2,100 cubic yards of clean backfill material to prevent potential erosion and recontamination
- Removing approximately 554 creosote-treated timber piles from Bellingham Bay
- Providing a net reduction of more than 9,640 square feet of over-water cover through removal of the Carpenter Building

In addition, all work to be performed will incorporate BMPs and conservation measures to minimize potential environmental impacts from Interim Action activities. See Attachment 2 for a comprehensive list of BMPs to be employed during the project to minimize potential effects to wildlife.

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

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

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. [\[help\]](#)

Once completed, the Project will not create any long-term energy needs beyond those currently required at the site.

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

The Project will not affect the potential use of solar energy by adjacent properties.

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: [\[help\]](#)

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

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 purpose of the project is to remove contaminated sediments and upland soils and provide for source control of existing environmental health hazards from the environment. However, environmental health hazards could result from a spill of fuel or oil from operating equipment or from equipment accidents. Hazards will be limited to those encountered during Interim Action activities and will be controlled through Project specific plans (such as the SPCC Plan), as well as health and safety plans.

The Washington Hazardous Waste Management Act (RCW 70.105) and the implementing regulations, the Dangerous Waste Regulations (Chapter 173-303 WAC), will apply if dangerous wastes are generated during the in-water and upland portions of the cleanup action.

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

The Project is located within the boundaries of a MTCA site that is regulated by Ecology. The property is undergoing investigation under an Ecology MTCA Agreed Order (No. 7342) for upland and sediment contamination resulting from historic use of the property as a shipyard dating back to 1915 and other historic industrial uses back to the early 1900s. Ongoing coordination with Ecology will occur under the MTCA Agreed Order to address upland and sediment contamination at the property as part of the Project.

- 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.

This proposed Interim Action is being performed in compliance with the requirements of MTCA and Sediment Management Standards regulations. The primary chemicals of concern for the Project site as described in the agency-review draft RI/FS include arsenic, copper, and zinc for intertidal sediments; and arsenic, copper, zinc, fluoranthene, pyrene, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and polychlorinated biphenyls (PCBs) for subtidal sediments. The primary chemicals of concern for the uplands include arsenic, copper, nickel, zinc, and diesel- and oil-range petroleum hydrocarbons, for uplands (Floyd|Snider 2013). Note that the chemicals of concern will be reviewed and finalized in the revised agency-review draft RI/FS. ✓

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

No toxic or hazardous chemicals will be stored, used, or produced during Interim Action activities or operation of the Project.

- 4) Describe special emergency services that might be required. [help]

No special emergency services will be required for the Project.

- 5) Proposed measures to reduce or control environmental health hazards, if any: [help]

During Interim Action activities, excavated soils will be managed and disposed of in coordination with Ecology. During operation, BMPs will be implemented to reduce or control environmental health hazards to the extent practicable, including maintaining a SPCC Plan and equipment on-site to prevent, prepare for, and respond to any incidental spills that may occur on the property.

b. Noise

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

Noise in surrounding areas include standard operational noise typical to adjacent industrial uses. These types of 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 a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. [\[help\]](#)

Noise emitted from the Project will be typical to the industrial environment where the site is located. Short-term noise will be associated with Interim Action activities and will adhere to the provisions of the City of Bellingham Public Disturbance Noise code (Bellingham Municipal Code [BMC] 10.24.120). Long-term operational noise associated with the Project will be similar to existing uses at the property.

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

The Project will follow local noise control regulations. In-water Interim Action activities will be timed to occur within approved work windows to prevent impact to salmonids or forage fish and will not occur when juvenile and adult Chinook salmon, steelhead, bull trout, or forage fish are abundant in nearshore areas.

All equipment will be required to comply with pertinent U.S. Environmental Protection Agency equipment noise standards.

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 existing land use at the site includes a ferry terminal, boat building, and other marine-industrial related activities. Adjacent uses include a boat launch, a marine park, and a 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? [\[help\]](#)

The property has not been used for agriculture.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?

The Project will not affect or be affected by farm or forest land normal businesses operations, due to the lack of such operations in the area.

c. Describe any structures on the site. [\[help\]](#)

Existing structures within the in-water portion of the Interim Action include the Carpenter Building, its pier and associated Marine Railway Access Walkway, the Harris Avenue Pier, and the Western Marine Railway Access Walkway. Additionally, an existing timber float, concrete float, grated gangway, and a gangway platform are currently connected to the west side of the Harris Avenue Pier. There are also several outbuildings on the upland portions of the Site that support activities associated with marine shipbuilding and repair. In addition, there are also large structures that support the operations of the shipyard.

d. Will any structures be demolished? If so, what? [\[help\]](#)

In-water structures to be removed from the Project area are the existing timber section of the Harris Avenue Pier, Carpenter Building and its pier and walkway, and Western Marine Railway Access Walkway. The existing timber and concrete floats, associated gangway, and gangway platform, currently connected to the west side of the main pier, will need to be removed during the project work to provide a clear work area. These will be temporarily relocated to another location within the water operations area of the shipyard to provide the required safety and rescue boat access. The floats, gangway, and gangway connecting platform will be relocated to the approximate present location after the pier replacement is complete.

DATA

These structures will be removed by a derrick barge, land-based conventional crane, or other appropriate heavy equipment. Demolition will generally involve removing the above-water portions of the structures first and then removing the piles that support the structures. Refer to the Project Description (Attachment 2) for additional information regarding proposed structure removal.

e. What is the current zoning classification of the site? [\[help\]](#)

The site is currently zoned "Urban Village" (City of Bellingham 2013a).

f. What is the current comprehensive plan designation of the site? [\[help\]](#)

The current comprehensive plan designation is "Industrial" (City of Bellingham 2006).

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

The Shoreline Master Program designation of the Shoreline District, located within 200 feet of the ordinary high water mark, is "Urban Maritime" (City of Bellingham 2013b).

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

The Project area is considered a geologic hazard by the City of Bellingham. The Project area is rated as "Very High" seismic risk and also shoreline erosion (City of Bellingham 2014).

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

The Project will not change existing levels of employment after completion.

j. Approximately how many people would the completed project displace? [\[help\]](#)

The completed Project will not displace any people.

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

No measures are proposed to avoid or reduce displacement impacts.

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

The Project is consistent with local land uses and plans. The Project will enhance the existing natural environment within Bellingham Bay and associated shorelines by removing existing contaminants and overwater structure, and provide for source control through removal of creosote-treated piles.

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

No measures are proposed to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance because the Project is not expected to affect these resources.

9. Housing

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

The Project will not provide any housing units.

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

The Project will not eliminate any housing units.

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

No housing impacts will result from the Project; therefore, no measures to reduce or control housing impacts are proposed.

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? [\[help\]](#)

The timber section of the Harris Avenue Pier will be replaced with a steel and concrete section and is the tallest proposed structure associated with the Project. The pier will be approximately 14 feet

above mean lower low water. The principal exterior building materials proposed are concrete and steel.

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

Views will be altered by the removal of the Carpenter Building and its walkway and pier and the Western Marine Railway Access Walkway. The removal of the Carpenter Building and its pier will improve views from shore towards the water and from the water towards the shore. The remaining structures, including the Harris Avenue Pier and Eastern and Western Marine Access Walkways, will be rebuilt in their approximate location.

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

No measures are proposed to reduce or control aesthetic impacts.

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 Project is not anticipated to generate additional light or glare.

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

Light or glare from Project operations will not 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 would affect the Project.

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

Lighting and glare will be limited to what is necessary to service the property during Interim Action activities and site operations.

12. Recreation

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

There are two designated recreation sites adjacent to the Project: Marine Park and a boat launch at Fairhaven.

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

The proposed Project is not expected to affect access or ongoing use of these recreational facilities.

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

No measures to reduce or control impacts on recreation are proposed.

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. [\[help\]](#)

A records search and literature review was conducted by Historical Research Associates (HRA 2011), which resulted in no recorded structures within the Project area listed in or eligible for listing in national, state, or local preservation registers. A further assessment of the structures proposed to be demolished is currently being developed by professional archeologists and historians (i.e., those qualified to the standards of the Secretary of the Interior) to identify if any of these structures are eligible for listing in national, state, or local preservation registers. See Attachment 1 (Cultural Resources Records Research and Literature Review Report and Monitoring Report) for more information.

- 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. [\[help\]](#)

A literature review was conducted, which documented the historic use of the site. No evidence of human burials or cemeteries was noted in the Project area (HRA 2011); however, there are several archaeological sites recorded within an approximate 1-mile radius of the project area. These sites range in time period from precontact through the historic-period, and represent Native and non-Native use of the vicinity of the Project location. See Attachment 1 (Cultural Resources Records Research and Literature Review Report and Monitoring Report) for more information.

- 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.

A literature review was conducted in 2011 by professional historians and archaeologists to develop probabilities for encountering resources of varying ages and to provide context for historic and pre-historic resources, should any be observed during remediation (HRA 2011).

Pursuant to the recommendations in the literature review, HRA conducted archaeological monitoring of sampling activities in the uplands (Gilpin et al. 2012) and is in the process of preparing a site-wide Monitoring and Inadvertent Discovery Plan (MIDP) to ensure that the appropriate Project areas are monitored and that procedures are in place in case of an inadvertent discovery of archaeological materials and/or human remains.

Inadvertent
discovery.
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WACTA

An inventory of the structures that are proposed to be demolished will be performed by professional historians to record the structures and identify whether any of them are eligible for listing in national, state, or local preservation registers.

- 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. [\[help\]](#)

Archaeological monitors will be present on-site, as necessary and as outlined in the MIDP, and procedures in the MIDP will be followed during remediation. The MIDP includes steps to ensure that archaeological sites will be protected through the environmental evaluation and mitigation activities, as necessary.


Per the Section 106 process, Project proponents will maintain lines of communication with the Department of Archaeology and Historic Preservation, USACE, affected Indian Tribes, and other interested parties.

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 is currently accessed via Harris Avenue. The Project will not alter existing street access to the site.

- b. Is 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 area is served by Whatcom Transit Authority, which provides service to the Project site via Route 105, which provides a connection to downtown Bellingham (WTA 2014). 

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

The Project will not affect existing or future parking at the site.

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

The Project will not require new roads or streets or improvements to existing roads or streets.

- 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 proposed Project will use water transportation during Interim Action activities for the mobilization of barges. The project may also involve using rail transportation for the transport of sediments to an approved upland landfill. These uses will be temporary and will cease once Interim Action activities are complete. The proposed Project is not expected use air transportation.

- 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? [\[help\]](#)

Offsite disposal of dredged material will require additional truck traffic during Interim Action activities. The import of sand and gravel from an upland commercial or private source may also generate related traffic. The amount of traffic and peak traffic times will be a function of the selected contractor's operations plan and the amount of material that needs to be managed on site. Traffic impacts from the Project will be temporary in nature. The completed Project is expected to result in no net change in traffic.

- g. Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

The Project will not interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area.

- h. Proposed measures to reduce or control transportation impacts, if any: [\[help\]](#)

Transportation activities for Interim Action activities and operation of the Project will be comparable to past uses of the property. No significant transportation impacts are anticipated from Interim Action activities or operation of the Project; therefore, no measures to reduce or control transportation impacts are proposed.

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. [\[help\]](#)

The Project is not anticipated to create an increased need for public services.

- b. Proposed measures to reduce or control direct impacts on public services, if any. [\[help\]](#)

No impacts to public services from Interim Action activities or operation of the Project are anticipated; therefore, no measures to reduce or control direct impacts on public services are proposed.

16. Utilities

- a. Circle utilities currently available at the site: [\[help\]](#)
 electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. [\[help\]](#)

No new utilities are proposed for this Project.

C. SIGNATURE [HELP]

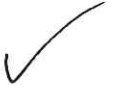
The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: John Hergeshelmer

Name of signee JOHN HERGESHELMER

Position and Agency/Organization SENIOR PROJECT ENGINEER

Date Submitted: 15 JAN 2015 PORT OF BELLINGHAM

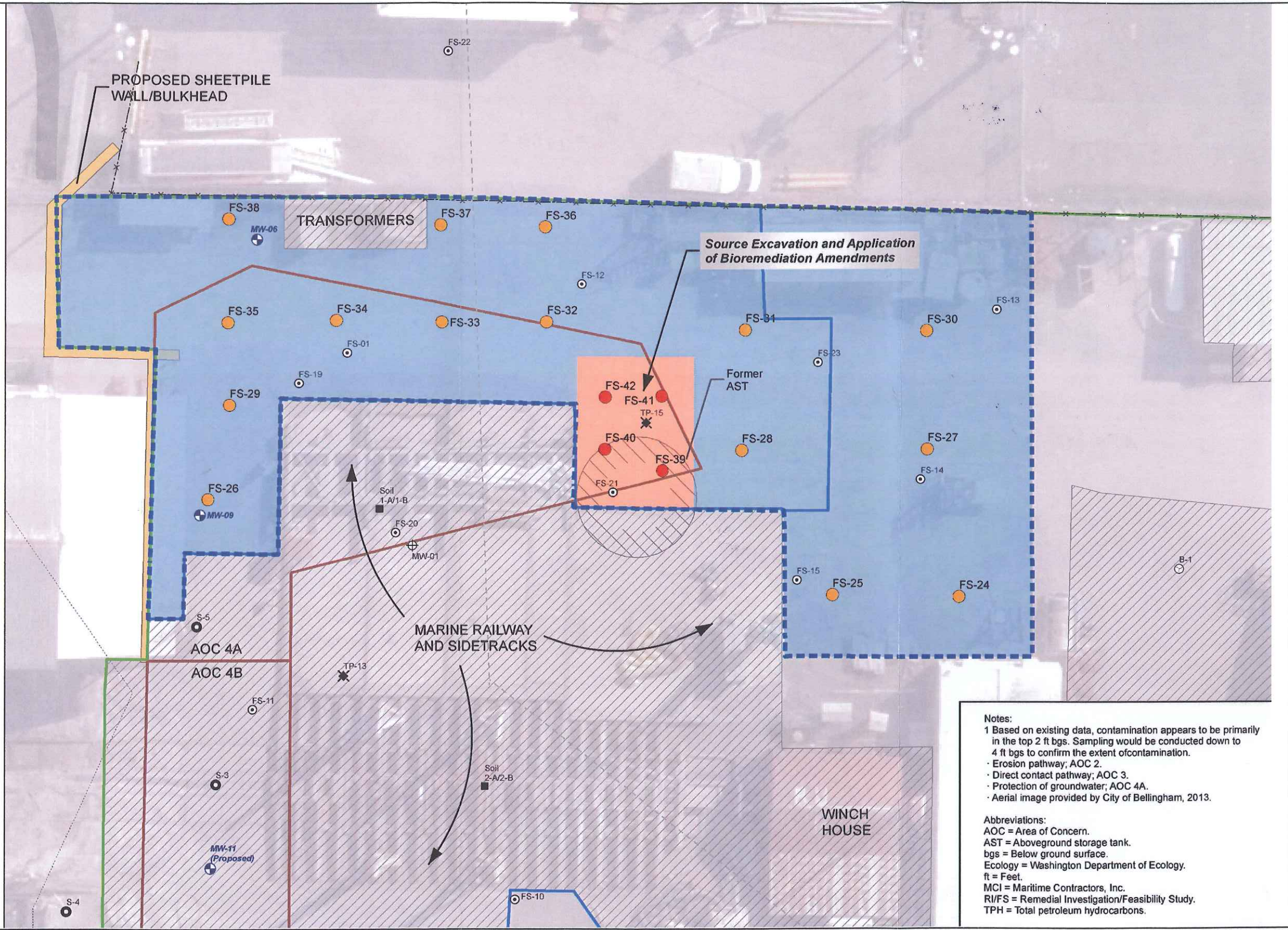
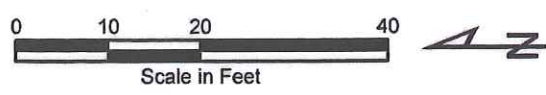


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Legend

Upland Interim Action Components

- TPH Source Area: Excavation to approximately 10 feet and application of bioremediation amendments prior to backfilling.
- Existing Unpaved Area: Grid sampling¹ with application of one of the following remedies in each grid area:
 - No action.
 - Excavate to cleanup levels.
 - Excavate 1 foot (AOC 3) or 2 feet (AOC 2); place geotextile and gravel cap.
- Proposed Pre-Design Shallow Soil Grid Sample Location (0-4 ft bgs)
- Proposed Pre-Design Deep Soil Grid Sample Location (0-10 ft bgs TPH Source Area)
- Compliance Monitoring Well
- Floyd|Snider Geoprobe Location (2011, 2013)
- MCI and Ecology Upland Grab Sample Location (1993)
- RETEC Monitoring Well
- RETEC Phase 2 Boring Location (1998)
- RETEC Phase 2 Test Pit Location (1998)
- RETEC RI/FS Offshore Sample Location (2005)
- RETEC RI/FS Upland Sample Location (2005)
- Existing Paved Area
- Upland Interim Action Area
- AOC 2
- AOC 3
- AOC 4A and AOC 4B
- 1998 Bathymetry Data
- Fence Line
- Harbor Line
- Riprap



Notes:

- 1 Based on existing data, contamination appears to be primarily in the top 2 ft bgs. Sampling would be conducted down to 4 ft bgs to confirm the extent of contamination.
- Erosion pathway; AOC 2.
- Direct contact pathway; AOC 3.
- Protection of groundwater; AOC 4A.
- Aerial image provided by City of Bellingham, 2013.

Abbreviations:

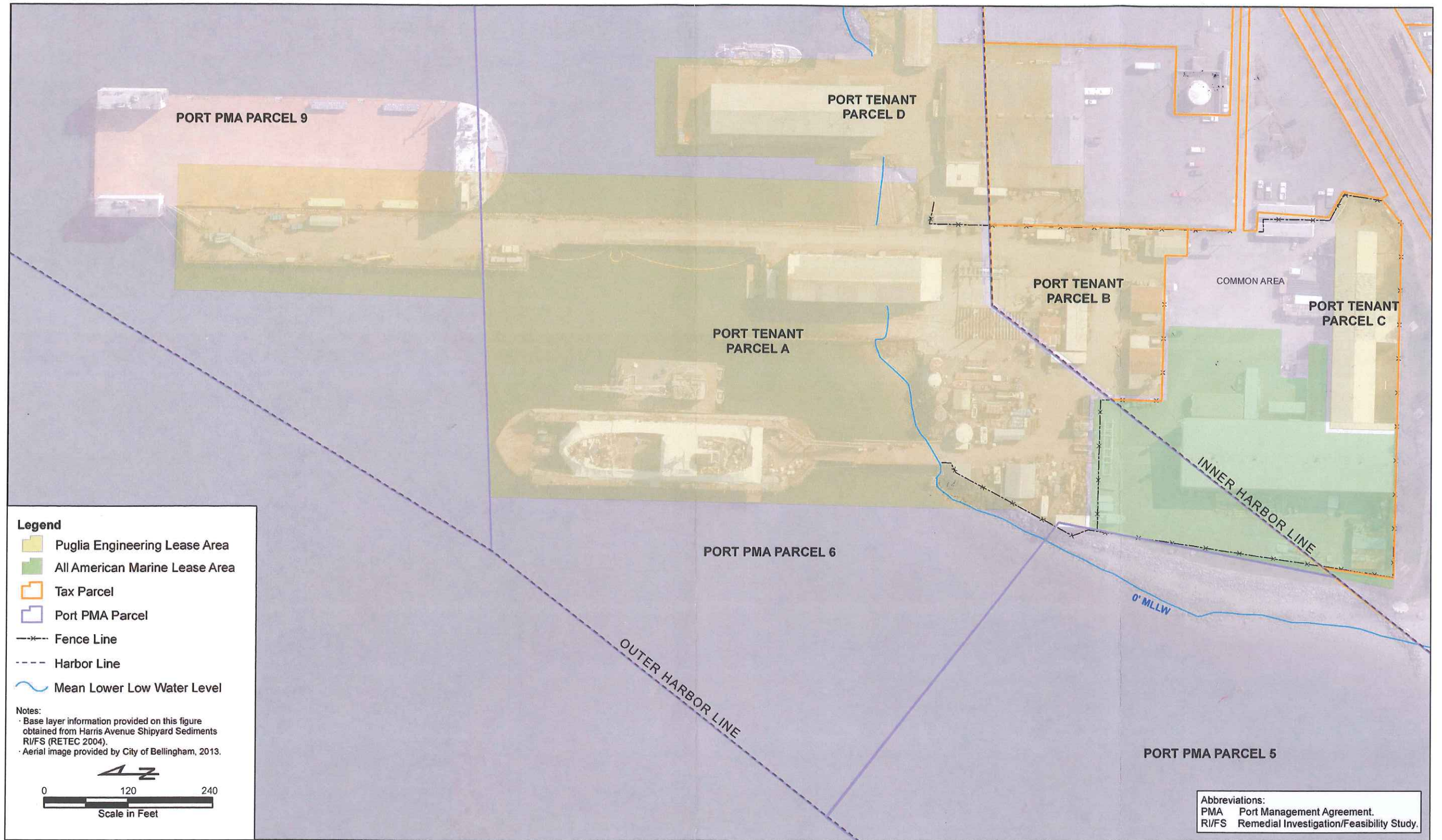
- AOC = Area of Concern.
- AST = Aboveground storage tank.
- bgs = Below ground surface.
- Ecology = Washington Department of Ecology.
- ft = Feet.
- MCI = Maritime Contractors, Inc.
- RI/FS = Remedial Investigation/Feasibility Study.
- TPH = Total petroleum hydrocarbons.

SOURCE: Drawing prepared from PDF provided by Floyd Snider dated 12-03-2014.



Upland Figure A
Upland Interim Action
SEPA Checklist
Harris Avenue Shipyard Site

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Dec 09, 2014 9:23am hhayward



SOURCE: Drawing prepared from PDF provided by Filloyd Snider dated 12-03-2014.



Upland Figure B
Site Parcel Boundaries and Lease Areas
SEPA Checklist
Harris Avenue Shipyard Site