STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
Northwest Regional Office • 3190 160th Ave. SE • Bellevue, Washington 98008
(425) 649-7000 • FAX (360) 649-7161

STATE ENVIRONMENTAL POLICY ACT (SEPA)
DETERMINATION OF NON-SIGNIFICANCE (DNS)

Description of proposal: The proposed action includes amending the legal agreement (Agreed Order: DE 7655) between the Washington State Department of Ecology, City of Bellingham and Puget Sound Energy. This legal agreement enables the cleanup process for the South State Street Manufactured Gas Plant cleanup site under the state's Model Toxics Control Act (MTCA). The proposed project is described in the Draft Interim Action Work Plan. The proposed project will repair approximately 450 linear feet of shoreline that is eroding, remove approximately 3,500 square feet of wooden pier and associated wooden piles, and stabilize the concrete bulkhead wall that supports the pier. This interim action is critical to preventing 1) human exposure to potentially contaminated upland soil, and 2) the release of contamination to sediment in Bellingham Bay. The interim action will be designed to temporarily stabilize the shoreline to facilitate completion of the ongoing RI/FS implementation of the selected cleanup action which will include measures to provide long-term shoreline restoration and repair.

Proponent: Gina G. Austin, P.E., MSCE, City of Bellingham, Parks Development Division
gaustin@cob.org, (360) 778-7000, 210 Lottie Street, Bellingham, WA 98225

Location of proposal: Boulevard Park, Bellingham, WA, Township 38 North, Range 2 East, Section 36, W.M., 48.732925, -122.501598

SEPA Lead Agency: Department of Ecology, NWRO Toxics Cleanup Program

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); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by August 21, 2017.

SEPA Responsible Official: Robert W. Warren

Position/Title: NWRO Toxics Cleanup Program Section Manager

Phone: (425) 649-7123

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

Date Issued: 7/27/17 **Signature:** _____

There is no agency appeal.

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

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

***Instructions for applicants*:**

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

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

Instructions for Lead Agencies:

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

Use of checklist for nonproject proposals: [help]

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

A. Background [help]

1. Name of proposed project, if applicable: [help]

Interim Shoreline Stabilization, City of Bellingham Boulevard Park

2. Name of applicant: [help]

City of Bellingham - Parks Development Division

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

Gina G. Austin, P.E., MSCE
Project Engineer
City of Bellingham - Parks Development Division
Bellingham City Hall, 210 Lottie Street, Bellingham, Washington 98225
Phone: (360) 778-7000
Email: gaustin@cob.org

4. Date checklist prepared: [help]

June 12, 2017

5. Agency requesting checklist: [help]

Washington State Department of Ecology (Ecology)

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

Construction of the interim shoreline stabilization is planned after August 1 through October 2017.

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

A remedial investigation and feasibility study (RI/FS) is being conducted under an Agreed Order (No. 7655, as amended) between the City of Bellingham (City), Puget Sound Energy (PSE), and Ecology (Document No. 7655). The RI/FS will lead to a final cleanup action in accordance with the Model Toxics Control Act (MTCA) regulations. This project is an interim stabilization action to provide protective measures during the time required to complete the MTCA RI/FS process. The interim stabilization action will be implemented prior to selecting the final cleanup action for the site and will not prevent the selection or implementation of other reasonable alternatives for the final cleanup action, per Washington Administrative Code (WAC) 173 340 430(3)(b).

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

- Interim Action Work Plan
- Basis of Design Technical Memorandum

- Joint Aquatic Resources Permit Application – in process
- Biological Assessment – in process

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

- As previously noted, the property is going through the MTCA cleanup processes under Agreed Order 7655. In accordance with the Agreed Order, all investigation and cleanup activities, including this Interim Action to stabilize the shoreline, are subject to review and approval by Ecology prior to implementation. Ecology has reviewed a preliminary draft of the Interim Action work plan, and is expected to provide approval to proceed after completing the public review and commenting period, required by MTCA.
- A remedial investigation (RI) report is being prepared to present the site's environmental data with comparisons to regulatory criteria. A feasibility study (FS) is underway to develop and evaluate cleanup actions to address contamination. The cleanup process is being conducted under the supervision of Ecology, who will select the preferred remedy for site cleanup upon completion of the FS.
- The City has proposed an over-water walkway extending from Boulevard Park to Cornwall Avenue. Environmental permits for the walkway were initially submitted June 14, 2010. Permit review is on hold pending negotiation with the regulatory agencies and tribes.

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

The project will require acquisition and/or meet the substantive requirements of:

- Shoreline Exemption – City of Bellingham
- Hydraulic Project Approval – Washington Department of Fish and Wildlife
- Section 10/Section 404 Authorization – US Army Corps of Engineers
- Aquatic Lands Lease Approval – Washington Department of Natural Resources
- Interim Action Approval - Washington State Department of Ecology

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.) [help]

The proposed project will repair approximately 450 linear feet of shoreline that is eroding, remove approximately 3,500 square feet of wooden pier and associated wooden piles, and stabilize the concrete bulkhead wall that supports the pier. Most of the bulkhead, pier, piling, and wood decking has shifted and bowed, and the top of the bulkhead is rotated outward toward the water. The interim shoreline stabilization includes:

- Site preparation involving movement of some existing riprap armor to provide a smooth surface of exposed soil for proposed riprap foundation.
- Placing a separation geotextile over the exposed soil.
- Placing appropriately-sized rock on the separation geotextile and filling in the gap formed by erosion to a height established by the design.
- Over-water demolishing the public wharf and pier wood decking.
- Demolishing select steel and concrete piles that extend out from and below the public pier by first trying vibratory removal with direct pull; if removal is not possible or the pile breaks and cannot be grabbed, exposing an approximate 3-foot diameter around each pile and cutting the timber approximately 2 feet below the mudline.
- Placing appropriately-sized rock against the water side of the bulkhead wall and backfilling voids on the upland side of the wall with rock.

This interim action is critical to preventing 1) human exposure to potentially contaminated upland soil, and 2) the release of contamination to sediment in Bellingham Bay. The interim action will be designed to temporarily stabilize the shoreline to facilitate completion of the ongoing RI/FS implementation of the selected cleanup action which will include measures to provide long-term shoreline restoration and repair.

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

The proposed project is located along the northwest and north shoreline of Boulevard Park. Boulevard Park is located on Bellingham Bay along South State Street and Bay View Drive in the South Hill Neighborhood.

B. ENVIRONMENTAL ELEMENTS [help]

1. Earth [help]

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]

Boulevard Park is relatively flat in the area of interest (along the shoreline). Slope at the face of the existing bulkhead located in a portion of the shoreline is approximately 100 percent (vertical).

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils. [help]

Boulevard Park has a low bank shoreline where fill was placed historically to expand the low lying shoreline waterward into Bellingham Bay. Much of this fill material consists of wood debris, soil, and rubble (e.g., broken concrete and riprap) that were used to control erosion. The repairs proposed are intended to be placed over existing exposed soils with minimal to no disturbance or removal of the exposed soils.

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

The shoreline of Boulevard Park has a low slope that is exposed to wind-driven waves from predominant southwest winds of winter and northwest winds of the summer. Riprap along the west side of the site was originally placed along the shoreline to protect it from erosion. However, the higher elevation portions of the riprap at the interface with the grassed upland has washed away and exposed the underlying fill soils—some of which may be contaminated. The public pier on the north end has been damaged and is failing. The underlying concrete bulkhead wall, which serves as the landward connection point for the public pier, is also cracking and showing signs of failure. Significant shoreline erosion occurred as a result of a February 2017 storm event.

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]

Purpose

- The purpose for movement or placement of materials is to provide temporary erosion control.

Materials

- Armor rocks will generally be 3- and 4-man size; underlain by quarry spall bedding. 1- and 2-man rocks will be used between the quarry spall and armor rock layers. Rocks will be angular and durable; sedimentary rock will not be used
- Armor rocks will be unweathered igneous quarry stone from Whatcom County quarries.
- A non-woven geotextile filter fabric will be used to create a separation layer between existing and newly placed materials.

Area/Quantities/Grading

- Rock erosion control will be placed along approximately 540 linear feet of shoreline.

- Project activities will occur landward of mean higher high water (MHHW), except for rock placement in front of an existing concrete bulkhead to limit further deterioration of that feature during completion of the RI/FS.
- In elevation, the rock erosion control will crest at 14 feet above mean lower low water (MLLW) with a front face slope on the waterward side of 1:1, a crest width of approximately 6 feet, and a landward-side slope of 2:1 to tie in the existing grass lawn. The 6-foot crest width allows for stability using large rock.
- Anticipated volume of materials:
  - 700 cubic yards (CY) of large rock (3- and 4-man)
  - 135 CY of small rock (1- and 2-man)
  - 215 CY of quarry spall
  - 1,200 square yards of geotextile
  - 60–100 CY of current rubble, debris, pile, and stone will be removed from its current location for project implementation. Most of this material will be reused in the project (see *Excavation* below).

Excavation

- Excavation will be limited to the greatest extent possible with the design intent of conducting no excavation. Some existing rock materials along the shoreline will be reworked to provide a stable or flatter working surface for placement of the stabilization materials. Brick or concrete fill materials which prevent creation of a stable or flatter working surface will be removed, containerized, and properly disposed of at an offsite solid waste disposal facility permitted to accept such materials.

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

Some minor short-term erosion during construction could occur; however, no long-term erosion is anticipated as a result of project activities, as the project objective is shoreline stabilization.

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

The proposed project will not add any impervious surfaces.

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

Proposed shoreline stabilization will preserve existing uplands in Boulevard Park adjacent to Bellingham Bay. All shoreline work will be conducted in the dry when tidal waters are at a lower elevation. During construction, best management practices (BMPs) will be used for erosion control

and pile removal. Any necessary temporary erosion and sediment control (TESC) measures will be developed as necessary, approved by the City, and implemented by the contractor.

2. Air [help]

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

Project construction activities could generate onsite dust from equipment operation, but these effects are anticipated to be temporary, minor, and largely contained at and within short distances from the proposed project site. Construction equipment and vehicles will generate minor amounts of localized carbon monoxide, and other products of combustion and particulate emissions. These emissions would only slightly degrade local air quality and on a temporary basis. No emissions will result from the completed project.

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

No offsite sources of emissions or odor have been identified that would affect the proposed project.

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

Construction BMPs will be incorporated into construction plans and contractor specifications. To reduce carbon monoxide and particulate emissions from gasoline and diesel engines, construction equipment will be well maintained and equipment will be turned off when not in use.

3. Water [help]

a. Surface Water:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. [help]

The project is in and adjacent to Bellingham Bay (Puget Sound) along the shoreline of Boulevard Park.

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 proposed project occurs in and adjacent to Bellingham Bay. The interim shoreline stabilization includes:

- Site preparation involving movement of some existing riprap armor and to provide a smooth surface of exposed soil for proposed riprap foundation.
- Placing a separation geotextile over the exposed soil.
- Placing appropriately-sized rock on the separation geotextile and filling in the gap formed by erosion to a height established by the design.
- Over-water demolishing the public wharf and pier wood decking.
- Demolishing select steel and concrete piles that extend out from and below the public pier by first by trying vibratory removal with direct pull; if removal is not possible or the pile breaks and cannot be grabbed, exposing an approximate 3-foot diameter around each pile and cutting the timber approximately 2 feet below the mudline.
- Placing appropriately-sized rock against the water side of the bulkhead wall and backfilling voids on the upland side of the wall with rock.

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]

Along most of the shoreline, all work will be above MHHW, so generally no material removed from or added to the surface water or wetlands. However, in the northern portion of the project, rock will be placed on the water-side of the existing concrete bulkhead. The amount will be less than 1 CY of material per 1 lineal foot of bulkhead.

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

No surface water withdrawals or diversions will be required as part of the project.

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

FEMA floodplain mapping identifies 100-year floodplain associated with Bellingham Bay extending to the shoreline of Boulevard Park (base flood elevation is not provided).

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]

Marine work will occur within approved in-water work windows, and will be conducted in a controlled manner that limits turbidity and dispersal of material in the water, maintains surface water quality at the mixing zone boundary, and prevents the spread of contaminated sediments. Anticipated measures to be employed to maintain surface water quality include:

- Piles to be removed will be vibrated to break the skin-friction bond between the pile and adjacent sediment, and slowly extracted with a vibratory hammer and in a manner that limits turbidity and sediment from re-entering the water column during pile removal. Piles will not be broken off intentionally by twisting, bending, or other deformation.
- A floating surface boom will be deployed around the perimeter of the work area in the event that floatable debris appears as a result of the dredging and marine demolition operations. Such debris will be collected and disposed at a properly permitted waste disposal facility.
- Spill prevention and response equipment will be used on all project barges to prevent the release of petroleum products and other hazardous substances to surface water.
- In-water work will be performed in accordance with permit conditions.
- No creosote-treated timber pilings or other wood products removed will be reused in the marine environment. If the City allows the salvage of any creosoted wood products, the contractor will be required to certify that the materials will not be reused for marine or other aquatic applications.

b. Ground Water:

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

No groundwater withdrawal will occur as part of the proposed project.

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

Not applicable. No waste materials associated with domestic sewage or other activities will be discharged into the ground.

c. Water runoff (including stormwater):

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

Stormwater on the shoreline either infiltrates or drains to Bellingham Bay, which will be maintained by the proposed project**.**

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

The proposed project is an interim shoreline stabilization to prevent further erosion from a known contaminated site. The interim stabilization action will be implemented in advance of selection of the final cleanup action for the site.

Release of waste material from construction activities could potentially occur from accidental fuel leaks or spills, but is not likely. During construction, standard BMPs for spill prevention, and erosion and sediment control will be implemented. Spill prevention and response equipment will be used on all project barges to prevent the release of petroleum products and other hazardous substances to surface water.

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

No. The proposed project will not affect site drainage patterns.

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

During construction, standard BMPs for erosion and sediment control will be implemented. See Question 3.a.6 for a list of the measures currently anticipated to be employed to maintain surface water quality.

4. Plants [help]

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

__X__**deciduous tree: alder, maple, aspen, other**
__X__**evergreen tree: fir, cedar, pine, other**
_____**shrubs**
__X__**grass**
_____**pasture**

____**crop or grain**
____ **Orchards, vineyards or other permanent crops.**
____ **wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**
____**water plants: water lily, eelgrass, milfoil, other**
____**other types of vegetation**

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

One tree will be removed and areas of lawn along the shoreline may be impacted to facilitate project construction.

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

No listed threatened or endangered plant species are known to be on or near the site.

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

The proposed project will limit vegetation impacts to the minimum amount necessary to stabilize the existing shoreline. Areas of existing lawn in Boulevard Park adjacent to the project will be preserved to the extent practicable.

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

Boulevard Park is an existing recreational facility with maintained landscaping. Weed species identified by the Washington State Noxious Weed Control Board common in urban environments may be present in or near the project area and may include, but are not limited to, Himalayan blackberry (*Rubus armeniacus*; Class C weed), herb Robert (*Geranium robertianum*; Class B weed), and common catsear (*Hypochaeris radicata*; Class C weed).

5. Animals [help]

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

Examples include:

birds: hawk, heron, eagle, songbirds, other: seabirds
mammals: deer, bear, elk, beaver, other: marine mammals
fish: bass, salmon, trout, herring, shellfish, other surf smelt

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

Listed species that may occur in the project vicinity in Bellingham Bay include:

- Puget Sound Chinook salmon *(Oncorhynchus tshawytscha*),
- Puget Sound steelhead (*O. mykiss*),
- Coastal-Puget Sound bull trout (*Salvelinus confluentus*),
- Yelloweye rockfish (*Sebastes ruberrimus*)
- Bocaccio (*S. paucispinis*)
- Marbled murrelet (*Brachyramphus marmoratus*), and
- Southern Resident killer whale *(Orcinus orca).*

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

Nearshore waters in the project area are used as a migration corridor for salmon and sea run trout.

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

See Question 3.a.6 for a list of the measures currently anticipated to be employed to maintain surface water quality and that will also act to preserve aquatic wildlife.

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

None known.

6. Energy and Natural Resources [help]

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

Construction equipment will require electric and diesel fuel for operation.

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

The proposed project will not affect the potential use of solar energy by nearby 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]

Construction vehicle idling will be minimized to reduce fuel consumption.

7. Environmental Health [help]

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

Polycyclic aromatic hydrocarbons (PAHs) are the primary constituents of concern along the shoreline that needs repair. Exposure is expected to be minimal. Field workers will have the appropriate HAZWOPER training per OSHA 29 CFR 1910.120.

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

Prior to development of the park, the site was used as a lumber mill, a manufactured gas plant (MGP) that manufactured gas from coal, and a railroad alignment. In 1975, the City acquired most of the MGP property for use as a park. Several environmental investigations have been conducted at the site and are summarized in the ongoing RI. The RI report is currently in progress, but studies to date have confirmed that historical activities resulted in site contamination. PAHs are the primary constituents of concern along the shoreline in need of repair.

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. [help]

Polycyclic aromatic hydrocarbons (PAHs) are the primary constituents of concern along the shoreline.

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. [help]

There will be no long-term storage or creation of hazardous or toxic chemicals. Equipment fuels, oils, and liquids will be onsite during construction and will be removed after project completion.

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

No special emergency services will be required for the proposed project. No additional police, firefighting, or other emergency services, other than those that will normally be required at a construction site, will be necessary.

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

A site-specific health and safety plan will be available for the proposed project. BMPs will be in place to ensure any minor spillage of equipment liquids (fuel, oil, etc.) is properly contained and disposed of. Any spill of materials such as diesel fuel and lubricating oil will be cleaned up immediately. Site workers will be HAZWOPER trained to comply with OSHA 29 CFR 1910.120, and made aware of the potentially contaminated soil along the shoreline.

b. Noise [help]

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

Noise associated with adjacent park activities in the project area will not affect the proposed project.

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

Construction of the proposed project will generate temporary short-term increases in noise levels at adjacent and nearby areas. Construction will be conducted in accordance with City of Bellingham noise ordinance. Noise sources will include construction equipment such as large trucks and excavators. Construction activities may occur during nighttime hours.

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

Construction BMPs will be incorporated into construction plans and contractor specifications, which may include, but are not limited to, the following: fitting construction equipment engines with adequate mufflers, intake silencers, or engine enclosures; and turning off construction equipment when not in use.

8. Land and Shoreline Use [help]

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

The project site is currently used as a public park. Adjacent properties include Burlington Northern Santa Fe railroad and multifamily residential.

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]

No. Prior to development of the park, the site was used as a lumber mill, an MGP that manufactured gas from coal, and a railroad alignment.

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: [help]

No.

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

Structures within the project area include a public pier extending from the shoreline.

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

As part of the project, the public wharf and pier (which is currently not safe for public access) will be removed.

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

The project area is zoned Public.

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

The current comprehensive plan designation of the site is Public.

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

Urban Conservancy (UC)

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

The upland areas of the project are mapped by the City as a Seismic Hazard Area.

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

None.

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

No displacement of people would occur as a result of the proposed project.

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

Not applicable; no displacements will occur.

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

The proposed project is an interim shoreline stabilization, which will maintain existing areas of Boulevard Park.

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

None proposed as no impacts will occur.

9. Housing [help]

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

No housing units will be provided as part of this project.

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

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

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

Not applicable; no impacts to housing will occur.

10. Aesthetics [help]

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

Not applicable; the proposed project is an interim shoreline stabilization. No structures are proposed.

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

None.

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

None as no impacts will occur.

11. Light and Glare [help]

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

During construction, temporary lighting could be used by contractors during early morning hours (before 8 a.m.) or during nighttime work. The lights will be turned off at the end of the workday.

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

Any temporary lighting used during construction will not interfere with views or present a safety hazard.

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

There are no off-site sources of light or glare that will affect the proposed project.

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

Lighting used during construction, if necessary, will be temporary.

12. Recreation [help]

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

The project site is part of Boulevard Park. Boulevard Park is a City park providing beach access, trails, viewpoints, playground, and picnic amenities. "Concerts in the Park" is also hosted at Boulevard Park.

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

Trail and beach access to the public may be limited during construction activities.

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

Construction staging will be located to maintain public access to a majority of Boulevard Park and to facilitate "Concerts in the Park." Construction may occur at night to maintain day-use of the park by the public. The project is an interim shoreline stabilization that will maintain use of the park by the public.

13. Historic and cultural preservation [help]

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

None known. Prior to development of the park, the site was used as a lumber mill, an MGP that manufactured gas from coal, and a railroad alignment. In 1975, the City acquired most of the MGP property for use as a park. In early 1979, the City Parks and Recreation Department began development of the park, including construction of trails, parking lots, restrooms, and a picnic shelter.

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]

The Washington Department of Archaeology and Historic Preservation (DAHP) Washington Information System for Architectural and Archaeological Records Data (WISAARD) identifies Predictive Model – Environmental Factors with Archaeological Resources Results as Survey Highly Advised: High Risk. Archaeological survey of the Boulevard/Cornwall Overwater Pedestrian

Walkway Project, which partially overlaps the proposed project, found no evidence of potentially significant archaeological resources and that the potential for as yet undetected resources being present is very low. The proposed project includes minor excavations along an eroded shoreline containing fill and areas of known contamination.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [help]

Review of DAHP WISAARD website. Review of April 2010 *An Archaeological Survey of the Boulevard/Cornwall Overwater Pedestrian Walkway Project*, prepared by Wessen & Associates.

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]

None proposed.

14. Transportation [help]

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

Boulevard Park is accessible from South State Street and Bay View Drive.

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

Boulevard Park is served by Whatcom Transit Authority route 401. Bus stops occur along South State Street adjacent to the park.

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

None.

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

No.

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 occurs adjacent to /in Bellingham Bay but will not affect navigability.

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]

The completed project is not expected to change the number of vehicle trips in the project area.

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. [help]

No.

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

None proposed as no impacts will occur.

15. Public Services [help]

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

The project will not generate a need for additional public services.

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

None proposed.

16. Utilities [help]

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

No utilities occur within the project area, which is located along the shoreline of Boulevard Park.

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]

Utilities will not be required for the proposed 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: _____

Name of signee Gina Austin

Position and Agency/Organization Project Engineer, City of Bellingham

Date Submitted: 6/13/2017