SEPA ENVIRONMENTAL CHECKLIST
SHELL PSR NEW CRUDE AND PRODUCT TANKS PROJECT

A. Background

1. Name of proposed project, if applicable:

Shell PSR New Crude and Product Tanks Project

2. Name of applicant:

Shell Puget Sound Refinery (PSR)

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

Applicant:
Gene Akiaten
Shell Puget Sound Refinery
8505 South Texas Road
Anacortes, WA 98221
(360) 299-0180

Contact:
Eric Libolt
Whatcom Environmental Services
228 East Champion Street, Suite 101
Bellingham, WA 98225
(360) 752-9571

4. Date checklist prepared:

September 4, 2018

5. Agency requesting checklist:

Washington Department of Ecology

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

Construction: Start – January 2019; Complete – November 2020

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

No.

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

SWMU-55 Interim Action Plan, Shell Oil Products US, Puget Sound Refinery, 2018
Geotechnical Report, AECOM, 2017
Cultural Resources Assessment and Archaeology Monitoring Report, AECOM, 2017
Landfarm – SWMU-55 Test Pits – Sampling and Results; Whatcom Environmental, 2017

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.

The Washington State Department of Ecology has given authorization to conduct interim remedial actions at the site in accordance with 2018 SWMU-55 Interim Action Plan and the Agreed Order for Interim Action – SWMU 55.

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

Agreed Order for Interim Action – SWMU 55
Order of Approval to Construct – Air Permit, Northwest Clean Air Agency (NWCAA)
NPDES Construction Stormwater General Permit, Washington State Department of Ecology
Conditional Use Permit, Skagit County
Grading Permit, Skagit County
Building Permit, Skagit County

A Conditional Use Permit (CUP) may also be required for the diesel tank roof. However, the City of Anacortes is in the process of revising their code which may change the height threshold (currently 50 feet) for CUPs in Heavy Manufacturing zones. A determination if a CUP is required will be made at least 4 months prior to construction of any structure over 50 feet.

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.)

Shell Puget Sound Refinery (PSR) is proposing to conduct interim remedial actions at the SWMU-55 site as part of the the project to construct one new 190-foot-diameter x 72-foot-tall, 344,000-barrel nominal capacity, API650 crude oil tank, two new 150-foot-diameter x 50-foot-tall, 129,000-barrel nominal capacity, API650 gasoline and diesel tanks, and associated containment berms and other structures in the area of the existing Solid Waste Management Unit 55 (SWMU-55).

As part of the interim remedial actions, soil that is excavated as part of the project will be sampled to determine if the soil exceeds MTCA Method C cleanup levels for direct contact. Excavated soil which exceeds Method C will be transported offsite for treatment and disposal. Soil beneath the tank footprints will be sampled in place (to a depth of 15 feet) to determine if the soil exceeds MTCA Method C. Soil beneath the tank footprints which exceeds MTCA Method C will be excavated and transported offsite for treatment and disposal.

During and after the project, soil pore water and groundwater sampling will be conducted at the site to demonstrate that the waste residual soil remaining at SWMU-55 does not pose a threat to groundwater. As part of the interim remedial actions, all waste residual soil at the SWMU-55 site will be covered by a one foot thick clean soil layer or the waste residual soil will be covered by the tanks themselves, roadways, or a layer of sprayed on asphalt (on the containment berms).

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.

The Project is located at the Shell PSR, 8505 South Texas Road, Anacortes, WA, 98248, on Parcel P19874 in the SE ¼, Section 33, in Township 35 North, Range 2 East, Willamette Meridian, Skagit County, Washington. The site is northeast of the corner of 8th Street and "A" Street, which are inside of the refinery security fence. The site can be viewed from North Texas Road, which is a public road. A vicinity map and site plan are attached.

B. ENVIRONMENTAL ELEMENTS

1. EARTH

a. General description of the site:

(underlined and bold): **Flat**, rolling, hilly, steep slopes, mountainous, other

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

The containment berms that surround the tanks will be built with a slope of 1.5:1.

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.

A geotechnical investigation of the site has been conducted along with a soil sampling examination. The ground on which the new tanks will be constructed is predominantly stiff to very stiff clay. There is no expectation that any soil will need to be exported.

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

There are no indications of unstable soils in the immediate vicinity of the project site.

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

The project will use soil materials that exist on-site that have already been surveyed and tested. A small amount of material, such as sand, may be obtained as needed from local approved sites in Skagit County near the refinery. The soil will be used for new containment berms and for an access road into and around the site from the existing adjacent roadway ("B" Street). The berms will be constructed with a top elevation of approximately 9 to 17 feet above the berm toe. In addition to the berms and roadway, new concrete ring base foundations will be constructed to support the tanks. Approximately 28,000 cubic yards of soil will be required for building of berms and grading the site using soil from onsite sources.

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

Erosion is unlikely to occur as a result of clearing, construction, or use, due to the flat nature of the site.

The site also currently has berms that surround it that will be expanded in height and size. In addition, best management practices (BMPs) such as silt fences will be used during construction to minimize erosion.

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

Approximately 60 percent of the site will be covered with impervious surfaces. This includes the area directly covered by the new tanks, the roadways into the tank sites, and new berms that will surround the perimeter of the tanks for spill containment.

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

Measures to reduce or control erosion, or other impacts to the earth, will be implemented during the construction process at the site in accordance with the NPDES Construction Stormwater Permit, Ecology's General Stormwater Permit, and the County Drainage Ordinance (Skagit County Code [SCC] 14.32). BMPs may include:

- Protecting cut slopes during construction, and any soil stock piled on the site, by placing plastic sheeting on exposed cut slopes
- Limiting the maximum duration of open excavation to the shortest time possible
- Stabilizing disturbed soils that are exposed to surface water runoff
- Implementing in-place temporary construction erosion and sediment control measures prior to any site grading activities, which may include erosion control fencing
- Re-vegetating any exposed soils that are susceptible to erosion within 30 days
- Maintaining any erosion control measures left in place after construction is completed

2. <u>AIR</u>

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.

Construction: During construction, combustion emissions and dust will be temporarily emitted from construction equipment. Construction equipment that will be used includes dump trucks, backhoes, concrete mixers, cranes, and generators. Emissions associated with construction will be short-term and are not anticipated to result in air quality impacts.

Operations: The three new tanks will be API 650 tanks. One will be an API650 floating roof with Double seals and cone roof tanks with a frangible joint. This air pollution control technology will control odor and air emissions and will be incorporated into the existing Shell PSR air operating permit. In meeting the requirements, the proposal will not create undue odor or air pollution at the neighboring residential farm properties. Emissions of volatile organic compounds (VOC) will increase by 7.85 tons per year: 5.55 tons per year from the gasoline tank; 2.28 tons per year from the diesel tank, 2.28 tons per year for the Crude tank.; and 0.01 tons per year from equipment components.

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

No off-site sources of emissions or odor will affect the project.

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

Construction: The following measures are proposed during construction to reduce or control emissions:

- Wet exposed soils to minimize dust
- Cover stock piled materials
- Wash truck and equipment wheels before leaving site to reduce track-out
- Sweep roadway when track out accumulates

Operations: The new product tanks (gasoline and diesel tanks) will be subject to Clean Air Act New Source Performance Standards (NSPS) Subpart Kb, which provide requirements for VOC liquid storage tanks. Shell proposes to install an external floating roof tank for the finished gasoline product tank, which has primary and secondary annular seals, and a fixed API 650 Standard Fixed Cone Roof based on requirements under NSPS Subpart Kb to control emissions.

Operations: TK503 (Crude tank) will be subject to NSPS Subpart Kb, which provides requirements for VOC liquid storage tanks. Shell proposes to install an external floating roof tank and both primary and secondary seals based on requirements under NSPS Subpart Kb to control emissions.

3. WATER

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.

No surface water body is located on the site. The nearest surface water is the fire water pond at the north end of the Shell PSR. The nearest natural water body is Fidalgo Bay to the west of the project, which is over 1,500 feet from the project site. The nearest wetland is over 300 feet west of the project site, separated by a developed work area and parking lot.

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.

No. The project site is over 200 feet from any stream, lake, pond, saltwater, or wetland.

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.

Not applicable. No surface waters or wetlands are present on the project site.

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

No surface water withdrawals are necessary for the project.

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

No. The project site is near the highest elevation in the center of the March Point Peninsula, between approximately 150 and 160 feet above mean sea level.

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.

No. Stormwater will enter the PSR's stormwater system. PSR has several options for storage of stormwater at the effluent plant when needed including two surge tanks, two overflow basins, and a storm surge settling basin. All onsite stormwater discharges are monitored and tested in accordance with NPDES permit requirements.

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.

Groundwater will not be withdrawn or recharged for this project.

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

The project will not involve discharges of waste materials into groundwater.

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.

Sources of runoff include stormwater and a permitted NPDES outfall to on-site ditches.

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

The project will be designed to capture and/or control all potential wastes or spills and to prevent such material from reaching ground or surface water. The tanks will have liners under them along with a leak detection system. The site will also have a containment berm to prevent any tank or pipe leakage from escaping outside of the site. The upgraded berm is designed to fully contain potential leaks and spills from the new tanks, plus 10 percent, and including rainfall from a 24-hour, 25-year storm event. Shell PSR will modify its existing Spill Prevention, Control, and Countermeasure (SPCC) Plan and Washington State Spill Prevention Plan (SPP) to include the new tanks.

During and after the project, soil pore water and groundwater sampling will be conducted at the site to demonstrate that the waste residual soil remaining at SWMU-55 does not pose a threat to groundwater. As part of the interim remedial actions, and in order to prevent contact between waste residual soil and precipitation and surface water, all waste residual soil at the SWMU-55 site will be covered by a one foot thick clean soil layer; or the waste residual soil will be covered by the tanks themselves, roadways, or a layer of sprayed on asphalt (on the containment berms).

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

The proposal does not alter or affect drainage patterns. The drainage from the site already goes to the PSR Refinery's stormwater system.

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

Waters in on-site ditches will continue to be monitored and tested regularly. An erosion and sediment control plan will be prepared for the project. As part of the interim remedial actions, and in order to prevent contact between waste residual soil and precipitation and surface water, all waste residual soil at the SWMU-55 site will be covered by a one foot thick clean soil layer; or the waste residual soil will be covered by the tanks themselves, roadways, or a layer of sprayed on asphalt (on the containment berms).

4. PLANTS

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

____deciduous tree: alder, maple, aspen, other
____evergreen tree: fir, cedar, pine, other
____shrubs
__X__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
__X__other types of vegetation

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

Herbaceous, non-native species are present around the edges of the landfarm cells. These species include lesser hawkbit (*Leontodon saxatilis*), tall fescue (*Schedonorus arundinaceus*), horseweed (*Conyza canadensis*), mayweed (*Anthemis cotula*), cheat grass (*Bromus tectorum*), and English plantain (*Plantago lanceolata*).

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

No special-status plant species are known 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:

The project site is within an industrial refinery. No landscaping is planned for the project.

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

The site contains small amounts of the following noxious weeds: bull thistle (*Cirsium vulgare*), Canada thistle (*Cirsium arvense*), and poison hemlock (*Conium maculatum*). The species listed under 4(b) are not listed noxious weeds, but may be considered invasive.

5. ANIMALS

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

birds: hawk, heron, eagle, songbirds
mammals: deer
fish: salmon, trout, herring, shellfish (in Fidalgo Bay)

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

No threatened or endangered (T&E) species are located on the site. Habitat for T&E species does not occur on the site. The nearest special-status wildlife species location is an eagle nest, which is over 660 feet away from the project site.

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

The Shell PSR site is located within the Pacific Flyway, which is a flight corridor for waterfowl and other avian fauna migration. The Pacific Flyway extends from Alaska south to Mexico and South America. The project will not affect use of the Pacific Flyway by migratory birds.

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

None.

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

No invasive animal species are known on the site, but European starlings (*Sturnus vulgaris*) are likely in the area.

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.

No new energy sources will be required. Electricity will be provided by the existing plant electrical power system.The electrical power that will be used is designed to power tank mixers, tank and area lighting.

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

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:

The project only requires a small amount of energy which is supplied by the existing power supply system. No energy conservation features are proposed.

7. ENVIRONMENTAL HEALTH

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

By design, potential leaks and spills from the new tanks and associated piping can be fully contained with the tank area, which will have dikes designed in accordance with API650 and Shell Standards for containment.

Waste residual soil which is excavated during the project will be sampled to determine if the soil exceeds the MTCA Method C cleanup level for direct contact. The MTCA Method C level is used to develop a cleanup level for industrial worker direct contact. Soil which exceed MTCA Method C will be handled in accordance with appropriate health and safety standards and will be transported offsite for treatment and disposal.

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

The site is a former land treatment facility (SWMU-55) that contains waste residual soil from the land treatment of refinery non-hazardous and non-dangerous wastes. Soil field screening and sampling at test pits has been conducted (Whatcom Environmental, 2017). Waste residual soils were found to contain petroleum compounds and some metals, but no hazardous or dangerous waste. The petroleum compounds have not migrated significantly into underlying native soils or groundwater.

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.

There are no hazardous chemicals or conditions that affect the project development. There are aboveground lines containing hydrocarbon material near the tank area whose locations are well documented and controlled.

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.

The tanks will store crude oil, finished diesel, and gasoline. By design, the area in which the tanks are sited will be capable of providing full spill containment of the tanks contents and prevent the migration of the tanks contents in the event of a spill. The containment is designed for the life of the tanks.

4) Describe special emergency services that might be required.

No special or new emergency services will be required. Trained refinery personnel are able to respond to emergencies on-site. Shell will continue to coordinate with local emergency responders.

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

Shell PSR proposes to modify its existing Spill Prevention, Control, and Countermeasure Plan (SPCC) to

include the installation of the new tanks at the Shell PSR site.

b. Noise

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

The project is located within an active industrial area. Existing noise sources (vehicular; air, rail, and water traffic; surrounding operations) 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.

Construction: In the short term, noise will be created by construction activities. Construction equipment to be used includes various sizes of bulldozers, loaders, cranes, welding machines, compaction machines, dump trucks, forklifts, and pick-up trucks. Per Skagit County Code 9.50 and WAC 173-60, construction-related sounds from temporary construction sites are exempt from noise level standards between the hours of 7:00 a.m. and 10:00 p.m. Construction activities on the Shell PSR site will mostly occur during daylight hours; however, there may be a need to work outside these hours due to schedule or time constraints. A majority of all noises from construction will be limited to the Shell property.

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

Shell will adhere to Skagit County Code 9.50 and WAC 173-60 noise level standards during construction. Long-term noise impacts are not anticipated; therefore, mitigation measures for operations are not proposed.

8. LAND AND SHORELINE USE

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

The site is currently a land farm within an active industrial site (Shell PSR). The adjacent properties are also owned by Shell and contain industrial activities. The proposal will not affect current land uses on nearby or adjacent properties.

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?

No. The project site has been part of a refinery for 60 years, since its opening in 1958, and is not in active cultivation or grazing.

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:

There is an existing agricultural cattle ranch within the industrial area adjacent to both existing refineries on March Point. Construction activities will be coordinated with the cattle owners.

c. Describe any structures on the site.

There are no existing structures at the designated project site.

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

No structures will be demolished.

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

Skagit County classifies this site as A-UD Anacortes UGA Urban Development District. The City of Anacortes classifies the site as HM Heavy Manufacturing.

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

The PSR site is within Skagit County but within the Anacortes Urban Growth Area (UGA). Skagit County designates this site as A-UD Anacortes UGA Urban Development District. The City of Anacortes designates this site as HM Heavy Manufacturing.

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

Not applicable.

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

No critical areas have been designated on the site.

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

Not applicable. While construction would employ additional people, no additional staff will be required for operation.

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

None.

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

Not applicable.

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

Per Skagit County Code 14.16.220, uses are allowed within Urban Growth Areas provided they are also consistent with the standards for the zone that has been identified for the target property by the city. Per Anacortes Municipal Code Chapter 17.15, the March Point heavy manufacturing district (HM) is intended primarily for heavy manufacturing and closely related uses. Permitted uses in the HM zone

include industrial, processing, and shipping terminal uses, provided such uses do not inflict nuisances or hazards onto neighboring districts. Therefore, the proposed new tanks are considered permitted use and will be consistent with the HM district.

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

Not applicable.

9. HOUSING

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

Not applicable. No housing units will be provided.

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

Not applicable. No housing units will be eliminated.

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

None required.

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?

The proposed Crude tank will be 72 feet tall from the top of the foundation at the site. The gasoline product tank will be 50 feet tall as measured from the foundation at the site. The walls of the diesel tank will be 50 feet tall, but the top of the cone roof will extend to approximately 62 feet. The new steel tanks will be painted white and should blend in with the surrounding white tanks.

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

There will be no views that will be obstructed. The new tanks will be located within the refinery.

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

The new tanks will blend into and with the existing tanks in color.

11. LIGHT AND GLARE

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

Construction will require temporary lighting, including equipment lights and portable lighting structures, if work occurs during fall and winter when daylight is shorter. Access lighting at the tanks will be installed, but due to the location, no lighting glare is expected.

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

No. Lighting installation at the tanks will be consistent with adjacent tanks.

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

None expected or identified.

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

During construction and operation, lighting would be downward directed into the site, to the extent possible, to minimize effects. Platform lighting maybe directional but would result in minimal light intrusion to adjacent industrial properties.

12. RECREATION

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

There are no designated recreation areas in the immediate vicinity of the Shell PSR. The nearest recreation opportunity is informal biking recreation along March Point Road or informal boating recreation in Fidalgo Bay.

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

The project will not displace any existing recreational uses.

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

None required.

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 ? If so, specifically describe.

There are no buildings or structures located on the project site. The nearby structures are industrial facilities associated with the refinery.

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.

Within 1 mile of the project site, 21 cultural resource surveys have been conducted and 19 archaeological sites recorded. There are no known previous investigations or cultural resources within the project area based on desktop review. A project-specific pedestrian survey and cultural resource monitoring occurred during geotechnical investigations. No archaeological sites or historic structures were identified in the project area, and no cultural resource materials were found during monitoring. A

summary report was prepared for the monitoring.

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 records search and literature review was conducted using the online restricted-access Department of Archaeology and Historic Preservation (DAHP) Washington Information System for Architectural and Archaeological Records Data (WISAARD) system to identify previously conducted surveys and documented archaeological resources within the Project footprint and a 1-mile radius. After desktop review, an archaeologist completed a pedestrian survey and archaeological monitoring of geotechnical investigations in June 2017.

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.

Based on research and observations during cultural resource monitoring of the geotechnical investigations, no further monitoring of ground-disturbing activities during project construction is recommended. However, an Inadvertent Discovery Plan has been prepared for the project and will be implemented in the event that any cultural materials are discovered.

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.

The site is accessed from State Route (SR) 20 via Thompson Road, which becomes Bartholomew Road heading north. Private roads internal to the Shell PSR will provide direct access to the project site.

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?

The site is not served by public transit. The site is within the fenced refinery and not accessible by the general public. The nearest transit stop is the Skagit Transit-operated March Point Park-and-Ride, which is approximately 1 mile from the project site.

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

The proposed project does not include any parking spaces, nor will it eliminate any parking spaces.

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).

No new road, streets, or improvements are part of the project.

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

The project will not use air, rail, or water 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?

Since no new staff will be added for operation of this project, no new trips per day will be generated by employees.

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.

Operation of this project will not affect movement of agricultural and forest products on road or streets in the area. Delivery of major materials that may use North Texas Road via March Point Road will be coordinated with the local rancher to minimize any potential impacts.

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

Main roads designed for heavy industrial traffic such as Interstate 5, SR-20, and March Point Road will be utilized. Use of local roads such as North Texas Road will be coordinated with surrounding landowners to avoid conflicts.

15. PUBLIC SERVICES

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

An increased need for public services at the Shell PSR site will not occur as a result of the project. Existing fire and emergency services provided by Shell for the refinery will serve the new tanks.

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

No direct impacts are expected; therefore, no measures are proposed.

16. UTILITIES

a. Circle utilities currently available at the site: (available utilities are underlined)
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.

No new utility service from the city or county is required. The site will have both electricity and firewater utility requirements, all which will be provided for from the existing refinery utility infrastructure.

C. Signature

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

Signature: _____

Name of signee: _____

Position and Agency/Organization: _____

Date Submitted: _____