STATE ENVIRONMENTAL POLICY ACT
DETERMINATION OF NONSIGNIFICANCE

Date of issuance: July 8, 2019

Lead agency: Based on mutual agreement between the Washington Department of Ecology, Toxics Cleanup Program, Northwest Regional Office (Ecology) and the Port of Bellingham, Ecology is the lead agency.

Agency contact: Lucy McInerney
Cleanup Project Manager
Department of Ecology
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Description of proposal: The project will address upland soil and groundwater contamination associated with historic industrial operations at the Central Waterfront state-designated cleanup site on the Bellingham waterfront. The work includes soil removal, capping, groundwater natural attenuation, and engineering controls to prevent soil vapors and landfill gas exposures through indoor air inhalation.

The project is required by Ecology under authority of Washington's cleanup regulation, the Model Toxics Control Act (Chapter 173-340 WAC). The project is described in a draft Cleanup Action Plan, which is part of a legal agreement (agreed order) between Ecology, the Port of Bellingham, and the City of Bellingham.

Location of proposal: The Site is bordered on the north by I&J Waterway, on the east by Roeder Avenue, on the south by Whatcom Waterway, and on the west by the former Aerated Stabilization Basin (ASB) and Bellingham Bay, in Bellingham, Washington 98225. Section 25, Township 38N, Range 02E

Applicant/Proponent: Ben Howard
Environmental Project Manager
Port of Bellingham
P.O. Box 1677
Bellingham, WA 98227-1677
(360) 715-7365

Determination: Ecology reviewed the attached State Environmental Policy Act Environmental Checklist and the draft Cleanup Action Plan located on the Central Waterfront site webpage (https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=3418). We have determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement is not required under RCW 43.21C.030(2)(c).

This determination is based on the following findings and conclusions:

- Potential adverse environmental impacts are associated with construction activities and include: equipment noise and lights, traffic, inadvertent petroleum leaks and spills, equipment emissions, etc.
- Various local, state and federal, permit conditions and requirements apply to the construction work.
- Best management practices will be employed.
- Conditions, requirements, and best management practices will reduce/mitigate potential adverse impacts from construction activities.

Comment period: The comment period for Ecology's determination ends on August 6, 2019. This parallels Ecology's 30-day public comment period on the third amendment to agreed order /draft Cleanup Action Plan for the Central Waterfront site.

Responsible official: Robert W. Warren
Regional Manager
Northwest Regional Office
Toxics Cleanup Program
Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452
425-649-7054

Signature _____ Date 6/17/19

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:

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: Central Waterfront Site Cleanup

2. Name of applicant: Port of Bellingham

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

Ben Howard
Port of Bellingham, Environmental Project Manager
P.O. Box 1677
Bellingham, WA 98227
(360) 676-2500

4. Date checklist prepared: June 17, 2019

5. Agency requesting checklist: Department of Ecology

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

The project includes cleanup of contamination at the Central Waterfront Site in Bellingham, Washington. Project timing is dependent on Department of Ecology (Ecology) and other agency approval of the final design and related permitting. However, the anticipated design and construction schedule is as follows:

Remedial Design and Permitting: Summer 2019 to Fall 2021
Cleanup Construction: Fall 2021 to Fall 2023

Cleanup construction may be phased based on coordination with adjacent sediment cleanup and waterfront development projects.

Following cleanup construction, monitored natural attenuation (MNA) will be applied through performance sampling to address residual contamination in groundwater that exceeds applicable groundwater cleanup levels.

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

The Port of Bellingham (Port) and/or City of Bellingham (City) may redevelop shoreline property with similar timing as work described in this proposal, however such development would be a separate project.

Post-construction MNA will be performed for a duration and frequency identified in long-term monitoring plans to be developed as part of design activities.

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

- Remedial Investigation and Feasibility Study Report, Central Waterfront Site, prepared by Anchor QEA, dated March 2018
- Third Amendment to Agreed Order No. DE 3441 , including a draft Cleanup Action Plan and other exhibits, prepared by Ecology, dated February, 2019.

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

Yes. The Port has submitted a JARPA for the Hilton Stormwater Outfall Replacement project. This project will replace an existing undersized 8-inch diameter outfall pipe with a 12-inch pipe to meet capacity requirements for conveying runoff from the contributing drainage basin. The outfall is located on the south shoreline of the I & J Waterway Site Cleanup project. The outfall replacement work includes removal and replacement of rip-rap at the outfall location, but contaminated sediment will not be disturbed.

All American Marine has submitted a JARPA for a proposed project to install a new float, pier, and gangway as part of the I&J Waterway Fit-up Float and Pier Project located within and adjacent to the I&J Waterway at 1051 Hilton Avenvue.

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

The project will occur under a legal agreement between the Port of Bellingham, City of Bellingham, potentially other responsible parties, and Ecology in accordance with the Model Toxics Control Act (MTCA, Chapter 70.105D WAC). Under the MTCA, the project is exempt 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 remedial action. Ecology will require 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 state and local requirements are identified as applicable but procedurally exempt for cleanup action at the Site:

- Washington State Shoreline Management Act (RCW 90.58) and City of Bellingham Shoreline Permit under Shoreline Master Program, Bellingham Municipal Code (BMC) Title 22.
- Major Grading Permit; City of Bellingham Grading Ordinance, BMC Title 16.70
- City of Bellingham Stormwater Requirements, BMC Title 15.42
- Critical Areas Report; City of Bellingham Critical Areas Ordincance, BMC Title 16.55

In addition to complying with the substantive provisions of the above permits or approvals, an Ecology National Pollutant Discharge Elimination System Construction Stormwater General Permit (CSWGP) will be obtained for the project.

Additional permits, approvals, and substantive requirements may be further identified during remedial design, and their approval shall reflect Ecology's determination on which ones apply and may be listed as an exhibit to the legal agreement.

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.)

The project encompasses approximately 51 acres of upland waterfront industrial property in Bellingham, Washington. The Site is bordered on the north by I&J Waterway, on the east by Roeder Avenue, on the south by Whatcom Waterway, and on the west by the former Aerated Stabilization Basin (ASB) and Bellingham Bay (Figure 1-1 and Figure 1-2). The Site consists of upland areas.

The Port is proposing the project as required by Ecology under the MTCA. The project will address contamination at the Central Waterfront state-designated cleanup site and consists of the following components (see Figure 5-1):

- Hotspot soil removal in the C Street Properties subarea, with an approximate in-place volume of 1,000 cubic yards;
- Reduced-permeability capping in the Landfill footprint and the C Street Properties subareas;
- Physical barrier capping in the Hilton Avenue Properties subarea;
- Groundwater monitored natural attenuation (MNA) to address residual contamination in groundwater;
- Engineering controls to prevent soil vapors and landfill gas through indoor air inhalation; and
- Institutional controls including environmental covenants.

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 Site is bordered on the north by I&J Waterway, on the east by Roeder Avenue, on the south by Whatcom Waterway, and on the west by the former Aerated Stabilization Basin (ASB) and Bellingham Bay (Figure 1-1 and Figure 1-2), in Bellingham, Washington 98225

Section 25, Township 38N, Range 02E

See attached vicinity map (Figure 1-1) and proposed cleanup plan (Figure 5-1)

B. Environmental Elements [HELP]

1. *Earth* [help]

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

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

The upland areas are generally flat, with surface elevations generally ranging from 14 to 18 feet above MLLW.

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.

Five stratigraphic units have been identified at the project area. These units include:

1) Landfill cover soils unit – soils used to cover refuse from the former landfill and placed following closure of the landfill. This unit varies from 2 to more than 10 feet and consists of a mixture of loosely compacted sand, gravel, and silt with localized areas of fine lime, wood, and other materials.

2) Refuse unit – the refuse unit is comprised of roughly 50% municipal waste and 50% wood waste. The distribution of both types of waste is heterogeneous with the average thickness of about 23 feet and maximum thickness of 34 feet.

3) Soil fill unit – located to the south and north of the landfill. This unit is composed of loose to poorly compacted sand, silty sand, and silt derived mainly from the initial dredging of the Whatcom and I&J Waterways. The thickness of this unit is generally between 10 and 15 feet. Occasional shell fragments, gravel layers, and organic material are also present as well as other debris such as wood and concrete.

4) Sand unit – also referenced as the native sediment is generally present across the entire site. Gravels and shell fragments in the sand matrix indicate this unit is a native beach deposit. The thickness of this unit varies from 10 to 35 feet and has been disturbed in localized areas. This unit is mostly fine grained sand with varying percentages of silt.

5) Glacial marine drift – a regional geologic unit deposited during the most recent glaciation of the Puget Sound region and is present across the entire site. This unit is about 90 feet thick and is mainly composed of clay with varying percentages of silt.

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

Some erosion is occurring toward the head of the I&J Waterway at the end of the existing bulkhead. All other areas are stable.

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.

Approximately 1,000 cubic yards of petroleum contaminated soil will be excavated in the C Street Properties subarea and transported for off site disposal. Clean fill will be used to bring the excavation area back to surrounding grade.

The fill source will be determined by the contractor in accordance with construction specifications to be developed during design. The specifications will ensure that suitable material (e.g. clean, appropriately-sized, etc.) is used.

Two types of capping will be utilized for the cleanup action: 1) reduced-permeability cap (Landfill footprint and C Street Properties subarea) and 2) physical barrier cap (Hilton Avenue Properties subarea). Reduced-permeability capping will consist of soil covers to limit infiltration of stormwater such as asphalt pavement or building foundations. Physical barrier capping will consist of soil, gravel and/or hard surfaces to address the soil pathway for direct contact and erosion. Cleanup action capping will be evaluated during remedial design. Site grading will be designed to maintain

the required remediation performance standards and will be integrated with current site conditions and drainage.

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

Temporary impacts could occur during construction:

- Erosion of staging areas could occur from construction equipment use or material management activities.
- Erosion from excavation and filling activities could occur as well as material used for capping purposes.

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

The cleanup action project will increase the percentage of impervious surfaces from capping activities. The final percentage of impervious surfaces will be determined during remedial design. The design will need to incorporate applicable stormwater collection and control systems.

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

The cleanup action will include coverage obtained under Ecology's CSWGP. A stormwater pollution prevention plan (SWPPP) will be prepared that includes best management practices (BMPs) and a temporary erosion and sedimentation control (TESC) plan. Other agency BMPs/requirements may be identified during the design and permitting process. Contractors will be required to implement erosion control practices as specified in the design and construction documents.

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.

No emissions to the air will occur from the completed project.

During construction, short-term emissions to the air will occur from diesel and gasoline automobile/equipment exhaust. A minor amount of dust may also be generated from material handling activities depending on the seasonal conditions.

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 have been identified that would affect the proposed project.

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

No proposed measures. The completed project will not impact air.

During construction, equipment will be maintained in good working order to minimize airborne

emissions. Dust control BMPs (e.g., application of water) will also be employed as necessary.

3. Water [help]

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.

Yes. The project is located adjacent to Bellingham Bay, as shown on Figure 1-1. Bellingham Bay is an embayment of the Salish Sea and accommodates a variety of commercial and recreational uses. Whatcom Creek is located in the immediate vicinity of the project with the flow input at the head of Whatcom Waterway. No other wetlands or inputs (e.g., streams) are present in the immediate vicinity of the project.

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.

Yes. The project is located adjacent to Bellingham Bay as shown on Figure 1-1. The project includes focused excavation, capping, and and site grading (Figure 5-1).

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.

The project does not include fill or dredged material that would be placed or removed from surface water or wetlands.

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

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.

The project is located within Bellingham Bay along an urban shoreline. The upland areas are within a “Zone A” 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 not determined. (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.

The completed project will not discharge waste materials to surface water.

Incidental discharges may occur during construction such as accidental leakage of fuel and lubricating oils from equipment, vehicles, and temporary fuel storage. BMPs will be used to contain and recover any of these incidental discharges.

b. Ground Water: [help]

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.

The construction project will not withdraw groundwater, and water will not be discharged to groundwater.

Groundwater compliance monitoring is required as part of the cleanup action. This will include periodic groundwater collection from existing or future monitoring wells for testing at an approved laboratory.

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.

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.

The cleanup action will include coverage obtained under Ecology's CSWGP. A stormwater pollution prevention plan (SWPPP) will be prepared that includes best management practices (BMPs) and a temporary erosion and sedimentation control (TESC) plan. Other agency BMPs/requirements may be identified during the design and permitting process.

Some stormwater runoff may occur during project construction from upland staging and construction areas. Stormwater will be contained and managed properly. Any discharge to Bellingham Bay would be treated prior to discharge. Discharge of treated stormwater would likely occur through the existing storm drain system or other temporary discharge location.

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

The completed project will not generate waste materials.

It is possible that waste materials could enter ground or surface waters during construction. Waste materials include accidental leakage of fuel and lubricating oils from equipment, vehicles, and temporary fuel storage.

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

The project will alter or otherwise affect drainage patterns in the vicinity. The remedial design will evauate drainage patterns.

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

During project construction, stormwater runoff from upland staging and construction areas will be managed in accordance with Ecology's CSWGP, Ecology reviewed BMPs, and/or other agency requirements, as described in a construction SWPPP and TESC plan to be prepared.

BMPs will be implemented to control accidental leakage from equipment, vehicles, and temporary fuel storage. The contractor will prepare a Spill, Prevention, Control, and Countermeasure (SPCC) Plan describing BMPs and contingency measures.

BMPs to prevent or reduce impacts will include both source control BMPs and runoff treatment BMPs.

4. Plants [help]

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

_X__deciduous tree: alder, maple, aspen, other: Red alder (*Alnus rubra*)
_X__evergreen tree: fir, cedar, pine, other: Douglas fir (*Pseudotsuga menziesii*)
_X__shrubs: Himalayan blackberry (*Rubus armeniacus*), Scotch broom (*Cytisus scoparius*)
_X__grass
____pasture
____crop or grain
____ Orchards, vineyards or other permanent crops.
____ wet soil plants: attail, buttercup, bullrush, skunk cabbage, other
___water plants: water lily, eelgrass, milfoil, other: Sea lettuce (*Ulva fenestrate*), Rockweed (*Fucus vesiculosis*)
____other types of vegetation

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

Grass, shrubs, and a few deciduous trees may be impacted by staging and construction activities.

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

None are known.

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

No measures to preserve or enhance vegetation are proposed. Landscaping and/or planting may occur as determined during remedial design.

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

Certain areas of the project site contains invasive Himalayan blackberry and Scotch broom.

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.

Examples include:

birds: hawk, heron, eagle, songbirds, other: ducks, geese, cormorant, gulls
mammals: deer, bear, elk, beaver, other:
fish: bass, salmon, trout, herring, shellfish, other: forage fish (adjacent Bellingham Bay)

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

The following threatened or endangered species are known to be present in the vicinity of the project:

- Puget Sound Chinook salmon – (*Oncorhynchus tshawytscha*) – Puget Sound Evolutionarily Significant Unit
- Puget Sound Steelhead - (*O. mykiss*) – Puget Sound Distinct Population Segment (DPS)
- Bull Trout - (*Salvelinus confluentus*) – Coastal-Puget Sound DPS
- Bocaccio - (*Sebastes paucispinis*) Puget Sound/Georgia Basin DPS
- Yelloweye Rockfish - (*Sebastes ruberrimus*) Puget Sound/Georgia Basin DPS
- Orca whale (Killer whale) - (*Orcinus orca*) Southern Resident DPS

The following species may be present in Whatcom County and/or Puget Sound, but are not expected to be present in the immediate vicinity of the project:

- Humpback whale - (*Megaptera novaeangliae*)
- Marbled murrelet - (*Brachyramphus marmoratus*)
- Dolly Varden (*Salvelinus malma*)
- Canada Lynx (*Lynx canadensis*)
- Yellow-billed cuckoo (*Coccyzus americanus*)
- Streaked horned lark (*Eremophila alpestris strigata*)

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

The project is located within the Pacific Flyway, a major north-south flyway for migrating birds in America, extending from Alaska to Patagonia.

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

The project itself will benefit wildlife by capping or removing and eliminating direct exposure to contaminated surface soils.

The project will adhere to applicable regulatory requirements related to the preservation of animals.

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

No invasive animal species are 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.

The completed project will not use energy.

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:

None. The completed project will not use energy.

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

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.

Yes. The purpose of the project is to protect human health and the environment by removing or capping contaminated soil and groundwater as well as vapor engineering controls. Potential releases and accidental spills from construction vehicles and material handling may occur during construction.. Long-term monitoring and maintenance will be conducted to evaluate the performance of the cleanup action over time.

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

Contamination is present at the site from past uses including a municipal landfill and other industrial uses. The site consists of subareas with differing contaminates of concern. Landfill impacts are a source of contamination to groundwater. Groundwater and soil contaminates include metals, petroleum hydrocarbons, polycyclic aromatic hydrocarbons, volatile organic compounds, and semivolatile organic compounds. Landfill gas impacts are associated with the landfill footprint and perimeter as well as petroleum vapors in certain areas of the site where petroleum is present.

2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

The purpose of the project is to address contaminants and protect human health and the environment. Existing conditions related to contaminants are accounted for in the project.

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.

During construction activities, fuel and oil will be used for vehicles and equipment.

The project involves removal and management of contaminated soil, groundwater, and vapors.

4) Describe special emergency services that might be required.

None expected beyond contingencies for standard emergency health and safety response.

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

Regarding use and storage of fuel and oil, a project-specific SPCC plan will be developed and followed.

For contaminated soil and groundwater, standard handling procedures and BMP's will be in place and conducted in accordance with project requirements. In addition, contractors will be required to develop and comply with a project-specific Health and Safety Plan, including appropriate Hazardous Waste Operations and Emergency Response training. Following completion of the cleanup action, institutional controls will be implemented to ensure the long term integrity of the caps, including a requirement for annual inspections. Contingency actions will be taken as necessary to provide continued protection of human health and the environment.

b. Noise

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

Existing ambient noise associated with waterfront and urban activities in the area 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.

Typical construction noise from vehicles and equipment will occur on a short-term basis during daytime hours. These activities will adhere to the provisions of the City of Bellingham Public Disturbance Noise code. There will be no noise generated by the completed project.

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

The project will follow local noise control regulations.

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.

The majority of the property at the project is owned by the Port and leased for a variety of uses. Leases are in place for seafood processing at the Bornstein Seafoods facility, boat storage and maintenance, warehousing, Bellingham Technical College, and other commercial buildings.

Sanitary Services Company owns property within the project and operate a recycling and gargage collection facility used for the commercial truck fleet storage and maintenance. Puget Sound Energy also owns property within the project for an electrical substation.

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?

The property has not been used for working farmlands or working forest lands.

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 surrounding working farm or forest land normal business operations.

c. Describe any structures on the site.

There are a variety of existing structures within the project used to support commercial activities. All structures and infrastructure at the project area will be evaluated during remedial design to determine compliance with the cleanup action.

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

The cleanup action does not plan for the demolision of structures.

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

The property of the project is zoned Urban Village. This zoning classification is based on general use type from the City of Bellingham zoning map (7/13/2018). The shorelines are also included in the Waterfront District Planned Action Ordinance with land use classified as Marine Trades.

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

The property of the project is designated Urban Village. The shorelines are also included in the Waterfront District Planned Action Ordinance with land use classified as Marine Trades.

g. If applicable, what is the current shoreline master program designation of the site?
The shoreline is designated Waterfront District – Shoreline Mixed Use and Water Orientated Uses.

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

Yes. The project is within an area designated as Geologically Hazardous with a Very High Seismic Hazard rating and with Potential Wave Erosion. The project is also within an area designated as a Fish and Wildlife Habitat Conservation Area and a Frequently Flooded Area.

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

The completed project will not change existing levels of employment.

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

The completed project will not displace any people.

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

No measures are proposed to avoid or reduce displacement impacts. The project wil not displace any people.

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

The Port owns most of the property at the project In addition, the Port and City have worked in close partnership to create planning documents for the Waterfront District, which includes the project property.

Existing and projected land use informs how people and wildlife could be exposed to potentially harmful levels of contaminants. The purpose of the project is to eliminate exposure. Therefore, existing and projected land use is accounted for in the project.

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

No proposed measures. The project will not impact any agricultural or forest lands.

9. Housing [help]

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

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.

The project will not eliminate any housing units.

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

No proposed measures. The project will not impact housing.

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?

The cleanup action does not include the construction of structures that would have any significant height.

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

Existing views will not be altered or obstructed by the project.

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

No proposed measures.

11. Light and Glare [help]

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

The project will not increase light or glare beyond current conditions.

During construction, temporary lighting could be used by contractors during early morning hours (before 8:00am) or late afternoon hours (after 4:00pm) for visibility and safety. The lights will be turned off at the end of each workday.

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

No. The finished project will not produce light or glare that will be a safety hazard or interfere with views.

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

No existing off-site sources of light or glare will affect the project.

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

No proposed measures. The completed project will not produce light or glare.

During construction, lights will only be used when necessary and will be turned off at the end of each work day. Use of lights will adhere to applicable City regulations.

12. Recreation [help]

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

A public trail is located on the property within project areas.

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

No, the project will not displace any existing recreational uses. An existing City of Bellingham trail is located within the Hilton Properties subarea and may be temporarily closed during construction.

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

No proposed measures. The project will not impact recreation.

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.

No buildings, structures, or sites located within the project site were identified for listing. The project area is not currently listed in the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database. A number of historic properties within about 600 feet of the project are listed as “No Determination” in WISAARD.

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.

Based on historic maps, the property of the project is comprised of fill placed during industrial development. There are no landmarks, features, or other evidence of Indian or historic use or occupation. There is no known material evidence, artifacts, or areas of cultural importance on or near the project.

The project is located within the usual and accustomed (U&A) harvest areas of the Lummi Nation and Nooksack Tribe. These U&A areas include all tidelands in Bellingham Bay.

A WISAARD search of the Statewide Predictive Model layer for archaeological resources indicates that the project is within an area designated as “Survey Highly Advised – Very High Risk”.

The project is within the Waterfront District Redevelopment Project (a.k.a. New Whatcom Redevelopment Project) planning area. The Port issued a draft environmental impact statement (EIS) for the redevelopment project in 2008. The EIS work included a cultural resources assessment: Cultural Resources Assessment for the New Whatcom Redevelopment Project, Whatcom County, Washington, December 12, 2007, Northwest Archeological Associates, Inc. NADB#1350866. The assessment estimates a medium probability of finding intact Native American archeological materials in the project area.

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.

Review of the following:

- Historic maps
- WISAARD
- Cultural Resources Assessment, New Whatcom Redevelopment Project, 2007
- City of Bellingham Historic Register Sites and Districts

In addition, Ecology reviewed the project under Executive Order 05-05 and determined that it is unlikely to impact cultural resources or historic properties. This determination was made following consultation with DAHP, the Lummi Nation and the Nooksack Indian Tribe. DAHP Project No. 2019-03-01683.

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

The contractor will be required to comply with an Ecology-approved inadvertent discovery plan. The plan will describe steps to take in case of a cultural resource discovery.

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.

Streets in the vicinity of the project include Roeder Avenue, Hilton Avenue, and C Street. The project will not provide access to these existing streets. However, these streets may be used during construction for workers and equipment.

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 project location is served by Whatcom Transportation Authority routes 3 and 4.

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

The project will not create or eliminate 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).

The project does not anticipate any new or improvements to existing roads, streets, pedestrian, bicycle, or state transporation facilities; however, the remedial design will evaluate the performance of existing infrastructure to meet cleanup action objectives (i.e. environmental cap).

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

During construction the project is expected to use rail or truck to transport contaminated material to an approved disposal facility. These uses are temporary and will cease once construction of the project is complete. The project will not 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?

None. The completed project will not generate any vehicle trips.

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

No. Agricultural and forest products are not moved in the vicinity of the project.

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

No proposed measures. The completed project will not impact transportation.

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.

No. The proposed project will not result in an increased need for public services.

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

No proposed measures. The project will not impact public services.

16. Utilities [help]

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,

other: Internet

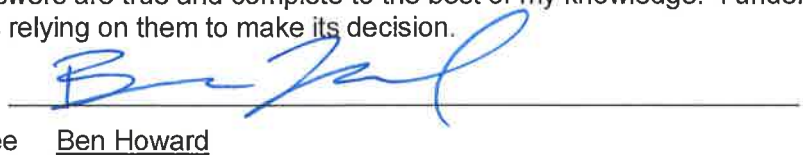
c. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

The completed project is not anticipated to need utilities; however, stormwater infrastrure and/or drainage will be evaluated during remedial design in order to meet cleanup action objectives.

During construction, a temporary job shack will be placed at the project. Temporary electricity will be connected to the job shack until the project is completed. Electrical service at the project area is provided by Puget Sound Energy.

C. Signature [HELP]

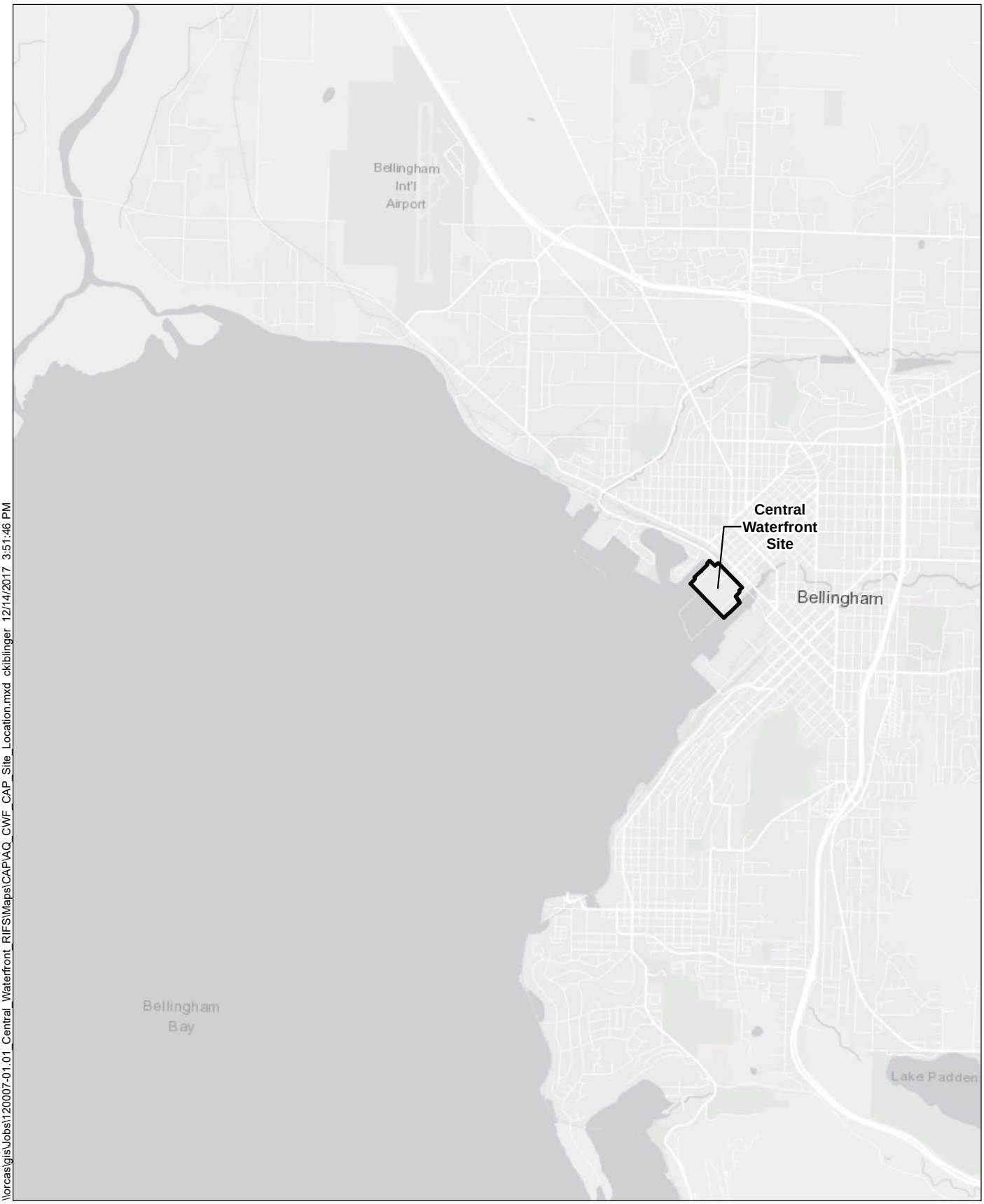
The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: 

Name of signee Ben Howard

Position and Agency/Organization Environmental Project Manager/Port of Bellingham

Date Submitted: June 17, 2019



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DEPARTMENT OF ECOLOGY
State of Washington

Feet
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Figure 1-1
Site Location
Cleanup Action Plan
Central Waterfront Site
Bellingham, WA

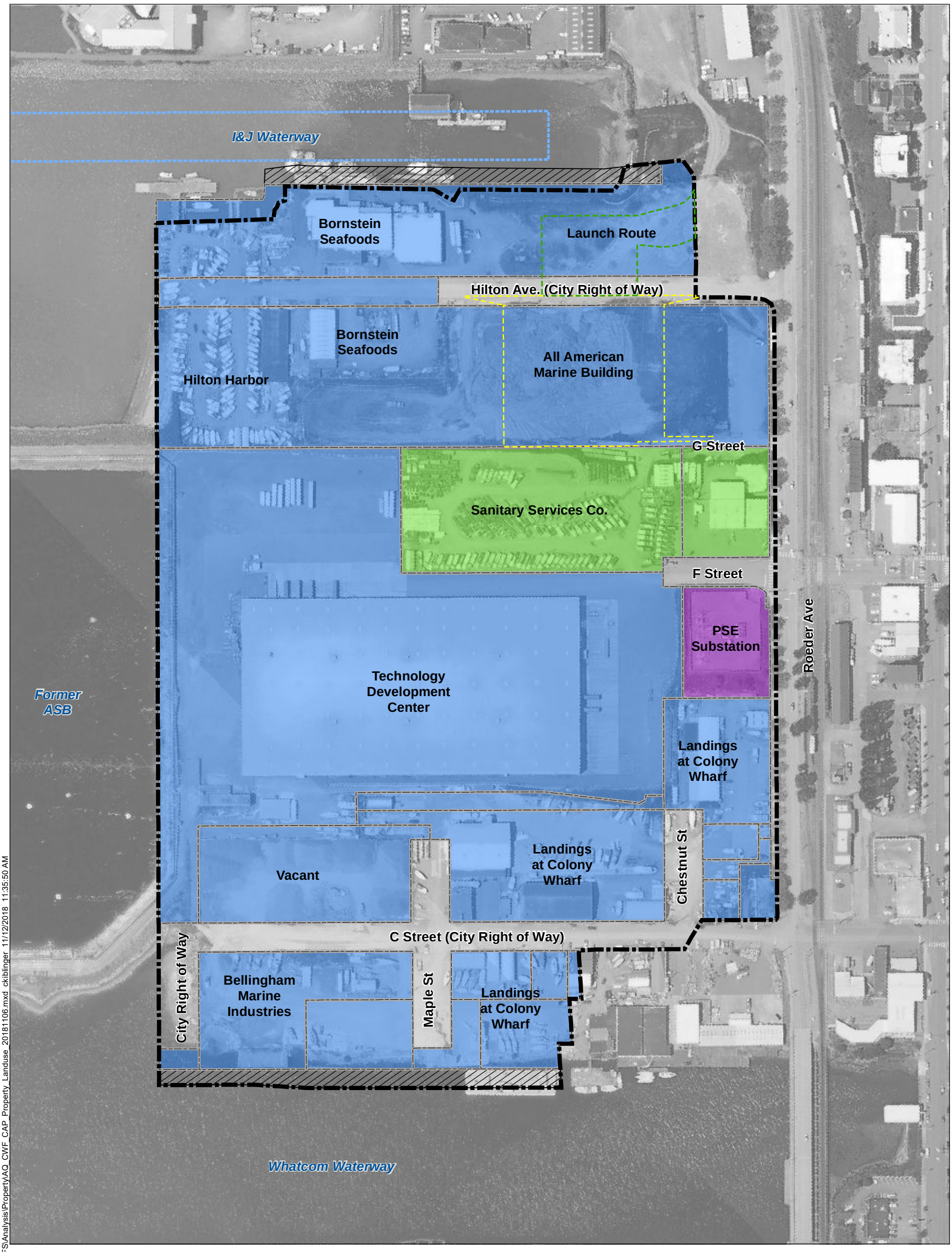

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Figure 1-2
Site Property Ownership and Current Land Use
Cleanup Action Plan
Central Waterfront Site
Bellingham, WA

DEPARTMENT OF ECOLOGY
State of Washington

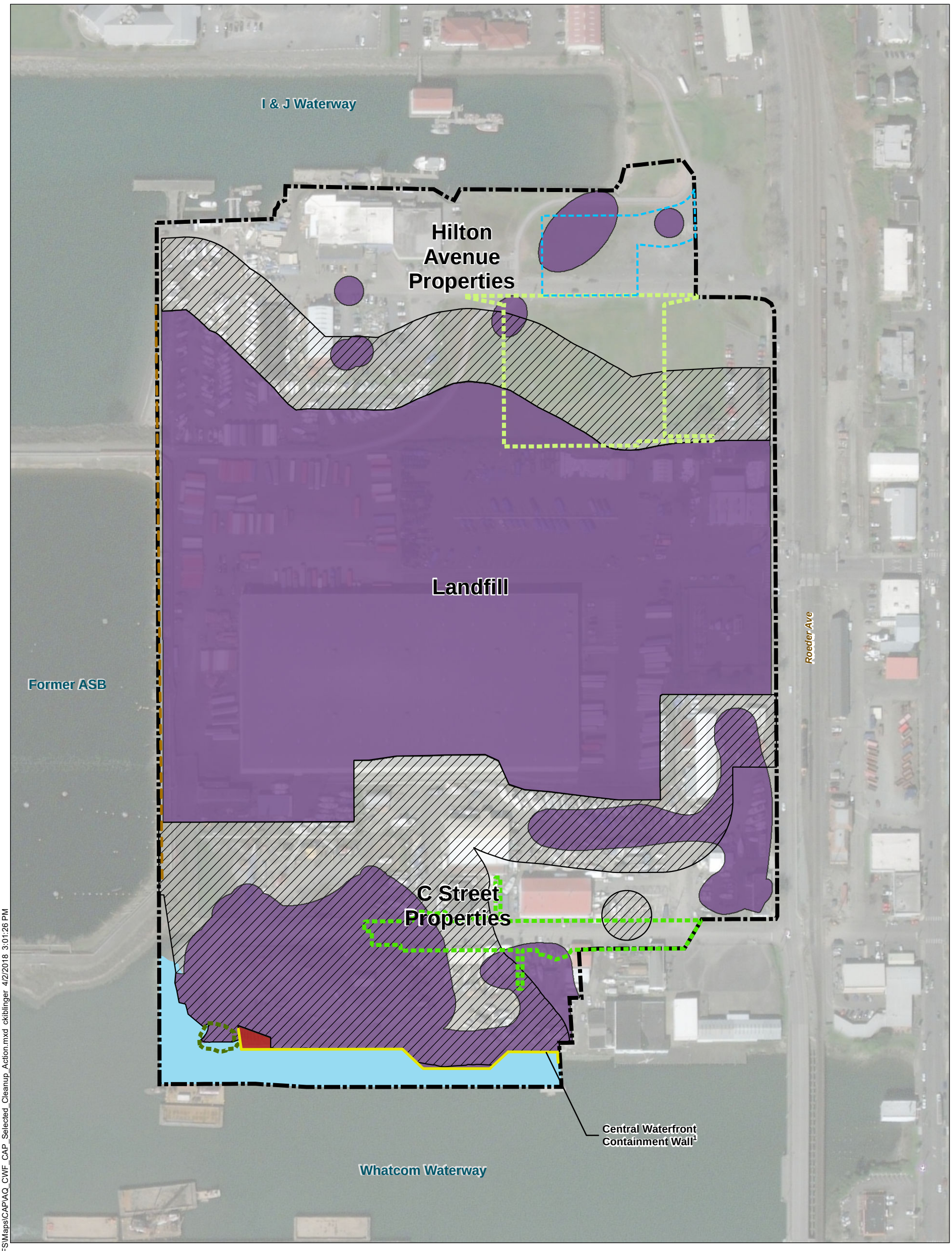

Figure 5-1
Selected Cleanup Action
Cleanup Action Plan
Central Waterfront Site
Bellingham, WA

DEPARTMENT OF ECOLOGY
State of Washington