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

Description of proposal: The proposed action is an environmental cleanup project that will address contaminated soil, groundwater and marine sediment. The source of contamination was an historic manufactured gas plant that operated on what is now the northern portion of the City of Bellingham's Boulevard Park. The contaminated portion of the park is a state-designated cleanup site on Bellingham Bay called the South State Street Manufactured Gas Plant cleanup site. The cleanup project includes a vegetated soil cap, groundwater monitored natural attenuation, and natural and enhanced sediment recovery and sediment capping. A remnant concrete gas holder will also be removed. 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 also available for public review and comment during this comment period. This cleanup project is being conducted under a legal agreement (agreed order) between Ecology, the City of Bellingham and Puget Sound Energy.

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 at least 15 days from the date below. Comments must be received by July 21, 2020.

SEPA Responsible Official: Robert W. Warren

Position/Title: NWRO Toxics Cleanup Program Section Manager

Phone: (425) 649-7054

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

Date Issued: May 21, 2020 **Signature:** 

There is no agency appeal for this determination.

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:

South State Street Manufactured Gas Plant (Site) Cleanup Action
See Figure 1 (Vicinity Map), Figure 2 (South State Street and Whatcom Waterway Site Units) and Figure 3 (South State Street Site and Property Ownership)

2. Name of applicant:

The City of Bellingham

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

Parks and Recreation Department
210 Lottie Street
Bellingham, WA 98225
Attn: Gina Austin

4. Date checklist prepared:

May 20, 2020

5. Agency requesting checklist:

Washington State Department of Ecology (Ecology)

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

Project timing is dependent on Ecology and other agency approval of the final design and related permitting. The duration of design and permitting is projected to be approximately 3 to 4 years. The construction schedule will be determined following completion of design and will require phasing of the upland and sediment activities, as well as coordination with the Whatcom Waterway site cleanup (see Figure 4). In-water work will be limited to permit-specified work windows.

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

The South State Street Cleanup Site is part of the existing Boulevard Park operated by the City. Restoration of park features will be completed as an element of the cleanup action construction. Future park modifications or development would be completed as a separate action.

Post-construction monitoring will be performed for a duration and frequency identified in the long-term monitoring plan that will be developed during the design phase.

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

- Ecology 2019. Second Amendment to Agreed Order No. DE 7655 between Washington State Department of Ecology, Puget Sound Energy, Inc. and the City of Billingham for the South State Street Cleanup Action Plan through Design.
- Landau and GeoEngineers 2019. “Final Remedial Investigation and Feasibility Study Report, South State Street Manufactured Gas Plant.” Prepared for the City of Bellingham and Puget Sound Energy. January 22, 2019.
- GeoEngineers 2020. “Public Review Draft Cleanup Action Plan, South State Street MGP Site, Bellingham, Washington.” Prepared for Puget Sound Energy, the City of Bellingham, and Ecology (date).

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 Site is going through the Model Toxics Control Act (MTCA) cleanup process under the Agreed Order.The Cleanup Action Plan (CAP) and future design documents are subject to review and approval by Ecology prior to implementation. Ecology has reviewed the Draft CAP and is expected to provide approval after completing the public review and comment period, required by MTCA.
- 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.

The Cleanup Action is anticipated to be conducted under a Consent Decree with potential liable parties (PLPs) and Ecology in accordance with MTCA (Chapter 173-340 WAC) and the Sediment Management Standards (SMS) (Chapter 173-204 WAC). Under MTCA, the cleanup action is exempt from the procedural requirement of specific state and local environmental permits but must comply with the substantive requirements of each state and local permit. Federal permits and approvals are still required, where applicable. Anticipated permits for the project include:

Federal Approvals/Permits:

- U.S. Army Corps of Engineers approval under Section 404 of the Clean Water Act (CWA) and Section 10 of the Rivers and Harbors Act. It is anticipated that the proposed action will qualify for a Nationwide Permit No. 38 for Cleanup of Hazardous and Toxic Waste (to be obtained as part of Joint Aquatic Resource Permit Application (JARPA) process)

State Approvals/Permits:

- Ecology National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (CSWGP)
- Washington State Department of Natural Resources Aquatic Land Use Authorization
- Washington Department of Fish and Wildlife Hydraulic Project Approval (HPA) (exempt from procedural requirements, must comply with substantive requirements)
- Ecology CWA Section 401 Water Quality Certificate (to be obtained as part of JARPA process)
- Northwest Clean Air Agency Air Operating Permit (exempt from procedural requirements, must comply with substantive requirements)

City of Bellingham Approvals/Permits (exempt from procedural requirements, must comply with substantive requirements):

- Fill and Grade Permit (Bellingham Municipal Code [BMC] Title 16.70) and related construction planning and design documents
- Construction Stormwater Permit (BMC Title 15.42)
- Shoreline Substantial Development Permit Exemption (BMC Title 22.05)

Ecology Toxics Cleanup Program Approvals:

- CAP Approval – Ecology
- EDR Approval – Ecology
- Design Approval – 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.)

The cleanup action construction consists of capping surface soil and performing groundwater treatment within the 4 acre upland portion of the Site (see Figure 5). The cleanup action also consists of capping sediment and monitoring natural recovery across approximately 22 acres of intertidal and subtidal marine areas of the Site (see Figure 6).

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

The South State Street Manufactured Gas Plant (MGP) was formerly located on a portion of what is now Boulevard Park on the eastern shore of Bellingham Bay (Figure 1). The Site is divided into an upland unit and marine unit, separated by the ordinary high-water mark (Figure 2). The upland unit encompasses the northern portion of Boulevard Park and is further divided into three areas: the upper park, the slope, and the lower park (Figure 5). The MGP was located in the upper park. The marine unit includes aquatic lands of Bellingham Bay. The upland unit includes property owned by the City, BNSF Railway Company (BNSF) and Washington State (managed by the Department of Natural Resources [DNR]) (Figure 3). The Marine unit includes State-owned aquatic land and platted street right of way.

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 unit is divided into the upper and lower park areas that are separated by a steep slope (see Figure 5). The slope ranges from 1:1 (100 percent) to 0.5:1 (200 percent).

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.

The site consists of bedrock overlaid by varying thicknesses of glacial marine drift, wood debris, and fill material consisting of granular fill, demolition debris and other debris.

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

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 was damaged by erosion in early 2017, exposing the underlying fill soils—some of which may be contaminated. An Interim Action was completed in 2017-2018 to stabilize the shoreline by repairing approximately 450 linear feet of shoreline that was eroding and stabilizing the concrete bulkhead that supports a pier.

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.

Within the upland unit of the Site, approximately 3.5 acres are proposed to be capped by a 2-foot thick cap consisting of imported granular fill and topsoil. The total volume of material imported for the upland capping element is approximately 11,000 cubic yards. Within the marine unit, capping and enhanced natural recovery methods are planned that will require placement of approximately 25,000 cubic yards of clean sand across approximately 5 acres of intertidal and subtidal areas. High energy areas, mostly within the intertidal zone, will require the cap material to be armored with layers of larger, stable rock mixtures. Approximately 5,000 cubic yards of rock material will be placed on top of the sand cap material. The sources of material have not been identified at this point, but are anticipated to consist of local, upland sources. The imported material will be required to be free of contaminants.

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

The remedy is intended to stabilize the shoreline and prevent erosion. Erosion in the upland area is not expected because of capping in the upland unit and the relatively flat finished topography. In-water capping areas will be protected from erosion.

During construction, potential minor short-term erosion will be controlled through the use of stormwater BMPs and other pollution control measures to be described in the project SWPPP, TESC and related civil engineering plans

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

Less than 5 percent of the Site is currently estimated to be impervious. This is not expected to change as a result of the cleanup action construction. Portions of the park that are currently pervious will be capped with a vegetated soil cover. Existing impervious surfaces consist of pathways and small structures, both of which will either be left in place or replaced as an element of the cleanup action construction.

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

Coverage will be obtained under Ecology's Construction Stormwater General Permit (CSWGP). A stormwater pollution prevention plan (SWPPP) will be prepared including best management

practices (BMPs) and temporary erosion and sediment control (TESC) measures consistent with CSWGP and City drainage control requirements. All contractors will be required to implement erosion control practices as specified in Ecology and City guidance during construction, including BMPs to prevent erosion and stormwater runoff. The design of the upland and in-water cap and other finished surfaces will include erosion-protection elements.

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.

Short-term emissions from vehicle and heavy equipment are anticipated to occur during the construction of the remedy. These emissions are typical for construction projects using similar equipment. Air monitoring will be conducted during construction, and additional BMP controls will be implemented if action thresholds are exceeded. BMPs may include covering disturbed soil or limiting the area disturbed at any one time. Dust emissions during dry periods will be controlled by wetting roadways and ground surface areas that may be disturbed. No long-term emissions are anticipated following construction.

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

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:

During construction, air monitoring will be conducted for air emissions and odors. BMPs to control emissions, odor and dust will be identified during design and construction planning.

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.

   The marine unit of the site exists entirely within Bellingham Bay. There are no surface water features associated with the upland unit.

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.

   The proposed project occurs in and adjacent to Bellingham Bay, see Figure 2. The cleanup along the shoreline and in water will include the following:

   Cleanup activities will take place within Bellingham Bay and within 200 feet of the shoreline. In-water work will include removal of debris (pilings and other large debris) in areas to be capped and placement of imported sand material in intertidal and subtidal areas. Capping sediment in the intertidal area is anticipated to be conducted using land-

based equipment during low tide events. Capping methods are to be further evaluated during the design phase. Placement of a sand cap over sediment in subtidal areas will be conducted through the water column using barge-mounted equipment.

In the upland unit, a permeable cap will be placed and groundwater treatment will be completed within 200 feet of the shoreline.

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.

   For planning purposes, an estimated 30,000 cy of cap material, including sand and armor rock, are planned to be placed in areas to be capped in Bellingham Bay. Further details regarding material quantities for grading and capping will be developed during the remedial design. Capping areas are depicted in Figures 5 and 6.

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

   No surface water withdrawals will be required. Stormwater controls will be installed to manage runoff during and following construction.

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

   Yes, portions of the marine unit are within the 100-year flood plain. The upland unit is not within the 100-year flood plain.

   FEMA floodplain mapping identifies the 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.

   No wastes are planned to be discharged to surface water. BMPs will be implemented to control potential spills of fluids from construction vehicles and possible temporary fuel storage. Upland construction will be conducted to minimize potential for releasing contaminated soils and groundwater to the aquatic environment.

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.

   Groundwater along the waterfront is considered non-potable. Existing groundwater monitoring wells will be sampled during or after construction. It is anticipated that water from monitoring well sampling or construction dewatering, if any, will be disposed of through the City's Publicly Owned Treatment Works, if feasible, and/or at a permitted off-site disposal facility.

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 septic or other systems will be constructed as part of the cleanup project.

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.

   Stormwater from the site will be managed in accordance with CSWGP and City requirements, as described in a construction SWPPP and TESC plan to be prepared. Following construction, stormwater will infiltrate into the permeable soil cap in the upland area. Stormwater runoff on impervious surfaces replaced during construction will be managed by replacing existing stormwater drains.

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

   BMPs will be implemented to control potential spills of fluids from construction vehicles, and to manage stormwater runoff during construction.

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

   The upland capping is expected to modify stormwater drainage at the southern edge of the Site, where the increased elevation of the capped upland surface meets adjacent uncapped areas off-site. Drainage in these areas will be addressed during design. Within the Site, stormwater drainage will be similar to current conditions, as existing surfaces will be generally replaced with similar surfaces.

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

The upland cap will be graded to prevent stormwater from ponding and eroding soil surfaces.

4. Plants [help]

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

__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

__X__water plants: water lily, eelgrass, milfoil, other
____other types of vegetation

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

Upland and aquatic vegetation that is altered or is covered with cap material will be replaced. Vegetation in the upland area that will be altered or covered includes grass and landscape plantings. Vegetation in the marine area that will be covered with cap material is eelgrass. A plan for mitigation of approximately 3.7 acres of eelgrass covered by cap material will be prepared as part of the project design and permitting in coordination with state and federal resource agencies.

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

No listed threatened or endangered plant species are know 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:

The upland area will be revegetated to restore the current park features and vegetation following construction. Additional details for revegetation will be prepared during the design phase.

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

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.

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.

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).*

The following ESA-listed species may occur in Whatcom County and/or Puget Sound, but are not expected to occur in the immediate vicinity of the project: Dolly Varden (*Salvelinus malma*), Canada lynx (*Lynx canadensis*), yellow-billed cuckoo (*Coccyzus americanus*), marbled murrelet (*Brachyramphus marmoratus*), streaked horned lark (*Eremophila alpestris strigata*), and humpback whale (*Megaptera novaeangliae*).

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

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:

See Question 3.a.6 for a list of the measures currently anticipated to be employed to maintain surface water quality during construction.

The project will enhance wildlife habitat in the long-term through site remediation efforts. In-water work will be conducted during approved in-water work windows. Upland and marine areas will be revegetated and restored following construction.

The project will adhere to additional applicable regulatory requirements related to the preservation of animals. It is anticipated that an Endangered Species Act (ESA) Biological Evaluation (BE) will be prepared during permitting to evaluate the potential for impacts to federally-listed species. BMPs and conservation measures will be included in the BE to minimize potential impacts to federally-listed species and will also provide protection for non-listed wildlife.

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

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.

No utilities will be brought to the Site as part of the cleanup action.

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

No.

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

No energy conservation plans are currently included in the cleanup action

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.

The project is being implemented to prevent further releases of hazardous chemicals from the site. Potential releases and accidental spills from construction vehicles and material storage during construction will be managed through engineering controls and other BMPs. Long-term monitoring and maintenance will be conducted to evaluate the performance of the cleanup remedy over time.

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

   The nature and extent of contamination for the South State Street upland and marine areas are described in the 2019 Final Remedial Investigation/Feasibility Study Report and are further summarized in the 2020 Public Review Draft CAP. Historic MGP operations resulted in petroleum hydrocarbons, volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs), cyanide and some metals (selenium and lead) exceeding screening levels in Site media (soil, groundwater and sediment).

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 South State Street Cleanup Action is intended to address site contaminants and protect human health and the environment. Existing site conditions related to these contaminants are accounted for in the proposed cleanup action and documented in the 2020 Public Review Draft CAP.

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.

   BMPs will be implemented to control potential spills of fluids from construction vehicles and possible temporary fuel storage.

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:

   See responses to Items 7(a)(2) through (4) above.

b. Noise

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

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.

   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. Some construction activities may occur during nighttime hours.

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

   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.

The project site is currently used as a public park. Adjacent properties include Burlington Northern Santa Fe railroad and multifamily residential. The project will not change the current land use.

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. 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:

   No.

c. Describe any structures on the site.

Numerous remnant timber pilings are present in the marine unit. Structures in the upland unit include the above-ground components of one gas holder and a former electric/generator building in the upper park area and a restroom and park shelter which functions as a covered stage in the lower park area.

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

The above-ground concrete cylindrical wall of the only remaining gas holder in the upper park will be removed and appropriately disposed of off-Site.

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

The project area is zoned Public.

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

The current comprehensive plan designation of the Site is Public.

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

Urban Conservancy (UC)

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

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?

None.

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

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

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

Not applicable as no displacements will occur.

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

The cleanup action will maintain existing use of Boulevard Park.

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

None are 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.

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.

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

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

Not applicable. No impact 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?

Not applicable; no structures are proposed.

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

None.

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

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?

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?

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?

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:

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

12. Recreation [help]

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

The project site is part of Boulevard Park. Boulevard Park is a popular City park that provides beach access, walking 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.

Park, trail and beach access to the public will be limited during construction activities but restored in the long-term.

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

Impacts to park use will be temporary during cleanup action construction. During design, considerations will be taken into account to minimize impacts to public access and recreation opportunities during construction . The City of Bellingham Parks Department will conduct public outreach activities as design plans, schedule, and sequencing is determined. The park will be returned to full use upon completion of remedial action construction.

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.

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 1976, 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.

An archaeological review for the South State Street Site conducted by Drayton Archaeology in 2019 identified several structural remains of the former MGP in the upper park, including the remaining gas holder and a brick utility/electrical building identified in a 1913 Sanborn map as a “transformer house.” The Drayton Archaeology report also identified a storm drain outfall line in the steep slope area that may be of historic age (older than 50 years).

According to the Drayton Archaeology report, a previous assessment conducted by Wessen & Associates in 2010 idenified site 45WH861 as the Northern Boulevard Park Piling Complex, which is an array of old log pilings that were likely associated with both the EK Woods Saw Mill operations and the Bellingham Boom Company/Foss Launch and Tug Company wharf.

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.

The Washington Department of Archaeology and Historic Preservation (DAHP) Washington Information System for Architectural and Archaeological Records Data (WISAARD) Predictive Model categorizes the Site 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.

Drayton Archaeology conducted a physical archaeological assessment of the project area in 2019 and did not identify cultural materials beside the previously documented site 45WH861 and the structural remains of the MGP discussed above. The investigation was limited to surface discoveries of cultural resources.

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

Review of "Archaeology Review for the City of Bellingham's South State Street Manufacutred Gas Plant MTCA cleanup site, Bellingham, Whatcom County," prepared by Dayton Archaeology and dated April 30, 2019.

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.

All work will be performed consistent with Section 8 (Historic, Cultural and Archeological Resources) of the Waterfront District Planned Action Ordinance (Bellinham Municipal Code [BMC] 16.30) and associated Cultural Resources Management Plan. An Inadvertent Discovery Plan will be prepared and implemented in accordance with applicable regulations, potentially including RCW 68.60, RCW 27.44. RCW 68.50, Executive Order 05-05, and Section 106 of the National Historic Prservation Act.

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.

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?

Boulevard Park is served by Whatcom Transit Authority route 1. 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?

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).

No.

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

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?

Park use is not anticipated to change based on the completed project. Workers will drive to the project site regularly during construction of the remedial action. Trucks will intermittently haul debris to permitted off-site disposal and/or recycling facilities, and will also transport imported capping and other materials and equipment to the Site. The number of vehicle trips will depend on the construction means and methods and will be further evaluated following the design phase. All traffic will adhere to City ordinances related to construction projects and traffic control. The completed project will not generate truck or vehicle traffic except during occasional field visits for monitoring and possible maintenance.

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.

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

All traffic will adhere to City ordnances related to construction projects and traffic control.

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.

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

None.

16. Utilities [help]

a. Circle utilities currently available at the site:
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other fiber optics

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

None.

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: GMAustin

Name of signee GINA AUSTIN

Position and Agency/Organization PROJECT ENGINEER / CITY OF BELLINGHAM

Date Submitted: 5/20/2020