STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
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STATE ENVIRONMENTAL POLICY ACT
DETERMINATION OF NONSIGNIFICANCE

Date of Issuance: December 7, 2020

SEPA Lead Agency: Department of Ecology, Northwest Regional Office, Toxics Cleanup Program

Agency Contact: John Guenther, (360) 255-4381, jgue461@ecy.wa.gov

Description of Proposal:

The proposed action associated with this SEPA Environmental Checklist is for implementing a cleanup action under the Model Toxics Control Act (MTCA) at the Harris Avenue Shipyard Site, located in Bellingham Washington. The Site consists of upland and aquatic lands that were used historically, and until recently, for industrial purposes, primarily as a shipyard.

The cleanup action selected by Ecology will remediate contaminated soil, sediment, and groundwater to the established cleanup standards. Multiple remedial technologies that were identified in the project-specific RI/FS were selected to best address metals, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbon (PAHs), and polychlorinated biphenyl (PCBs) contamination at the Site. The cleanup action also includes performance and compliance monitoring.

This SEPA determination applies to the initial remedial construction and compliance monitoring associated with the cleanup action. Future redevelopment activities that may occur at the Site are unknown and would be considered a separate project action possibly requiring its own SEPA review.

Location of Proposal:

The Site is located at 201 Harris Avenue, Bellingham, Washington 98225. In-water work would occur on state-owned aquatic lands managed by the Port under a Port Management Agreement

(PMA) with the Washington State Department of Natural Resources (WDNR). No tax parcel exists for these aquatic lands. The upland portion of the work would be completed on Port Tenant Parcels 370202398085 and 370202406107. The property is located in the southeast quarter of Section 02, Township 37 North, and Range 2 East.

Proponent Contact:

Brian Gouran
Port of Bellingham
1801 Roeder Avenue
Bellingham, WA 98225
(360) 676-2500

Ecology has determined that this proposal will 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 determination is based on a review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public upon request or at the Site web page: *https://apps.ecology.wa.gov/gsp/Sitepage.aspx?csid=193*.

The comment period for this DNS corresponds with the comment period for an Agreed Order amendment and draft Cleanup Action Plan. Comments must be received by **January 20, 2021**.

SEPA Responsible Official:

Robert W. Warren
Section Manager
Northwest Regional Office
Toxics Cleanup Program
(425) 649-7054

Signature:  **Date:** **December 7, 2020**

There is no 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:

   Harris Avenue Shipyard Site, Cleanup Action

2. Name of applicant:

   Port of Bellingham (Applicant/Responsible Party)

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

Applicant:
Port of Bellingham
P.O. Box 1677
Bellingham, WA 98227
(360) 676-2500

Applicant Representative:
Brian Gouran

4. Date checklist prepared:
   July 30, 2020

5. Agency requesting checklist:

   Washington State Department of Ecology (Ecology)

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

   Project construction is anticipated to begin in 2022 and end at the latest in 2024 with a total construction duration of up to 3 years. Confirmation and sediment cap monitoring would occur after project construction is complete. Confirmation monitoring would continue until cleanup standards are achieved at the relevant points of compliance; this is estimated to take approximately 5 years after remedy construction. Sediment cap monitoring would likely continue for 20 years following construction.

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

   The project is proposed to implement cleanup actions consistent with the Remedial Investigation and Feasibility Study (RI/FS) and a final Cleanup Action Plan to be issued by Ecology for the Harris Avenue Shipyard Site (the Site) after public review and comment. The project is limited to implementation of remediation and associated monitoring activities. Future redevelopment activities may occur at the Site; however, the scope/scale of any future work is currently unknown and would be considered a separate project action requiring its own SEPA review. The proposed project is not dependent upon any future redevelopment and would proceed regardless of possible future activities.

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

The following environmental information has been prepared specifically for the proposed project:

- *Harris Shipyard Draft Cleanup Action Plan, Ecology, 2020*
- *Port of Bellingham Harris Avenue Shipyard, Remedial Investigation/Feasibility Study, Floyd|Snider, June 2019*
- *Port of Bellingham Harris Avenue Shipyard, Interim Action Construction Completion Report, Floyd|Snider, March 2019*
- *Port of Bellingham Harris Avenue Shipyard, Interim Action Basis of Design Report, Floyd|Snider, January 2017*
- *Port of Bellingham Harris Avenue Shipyard, Interim Action Work Plan, Floyd|Snider, April 2015*
- *Port of Bellingham Harris Avenue Shipyard, Remedial Investigation/Feasibility Study Work Plan, Floyd|Snider, January 2011*
- *Ecology Agreed Order No. 7342*

The following environmental information would be prepared specifically for the proposed project:

- *Joint Aquatic Resource Application (JARPA)*
- *Biological Assessment*
- *Stormwater Pollution Prevention Plan (SWPPP)*
- *National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit*

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.

There are currently no known applications pending government approval within the Site.

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

The cleanup action would be conducted subject to the requirements of an Ecology Agreed Order (WAC 173-340-530). Because the cleanup action would be performed under an Agreed Order, it is exempt from the procedural requirements of certain laws and all local permits (WAC 173-340-710(9)(a)) but must comply with the substantive requirements of these laws and permits. The exemption from procedural requirements applies to the following:

- *Washington Clean Air Act (Chapter 70.94 RCW)*
- *Solid Waste Management Act (Chapter 70.95 RCW)*
- *Hazardous Waste Management Act (Chapter 70.105 RCW)*
- *Construction Projects in State Waters (Chapter 77.55 RCW)*
- *Water Pollution Control Act (Chapter 90.48 RCW)*
- *Shoreline Management Act (Chapter 90.58 RCW)*
- *Any laws requiring or authorizing local government permits or approvals*

However, this procedural exemption does not apply to the following federal, state, and local permits/approvals, which would still need to be acquired:

- *U.S. Army Corps of Engineers (USACE), Department of Army Permit*
    - *Section 106 Review National Historic Preservation Act*
    - *Section 7 Review Endangered Species Act*

- *Ecology, Coastal Zone Management Act Certification*
- *Ecology, NPDES Construction Stormwater General Permit*
- *City of Bellingham, Building Permit (Potential)*

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 proposal assessed by this SEPA Environmental Checklist is for implementing a cleanup action under the Model Toxics Control Act (MTCA) at the Site, located in Bellingham Washington. The Site consists of upland and aquatic lands that were used historically, and until recently, for industrial purposes, primarily as a shipyard. The Site's boundaries were determined by investigations of soil, groundwater, and sediment quality throughout the areas of known historical operations. The Site is bordered on the north and west sides by Bellingham Bay and on the south by Fairhaven Marine Park and the BNSF Railway rail lines. (See Figure 1– Vicinity Map and Figure 2 – Site Map).

The cleanup action selected by Ecology is proposed to remediate contaminated soil, sediment, and groundwater to the maximum extent practicable to meet the established cleanup standards. Multiple remedial technologies that were identified in the project-specific RI/FS were selected to best address metals, total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbon (PAHs), and polychlorinated biphenyl (PCBs) contamination at the Site. The cleanup action also includes performance and compliance monitoring.

The proposed cleanup action selected by Ecology includes the following:

SEDIMENT CLEANUP ACTIONS – Refer to the attached Site Plan (Figure 3) for Sediment Management Unit (SMU) locations.

- ***Dredging:*** *Accessible open water areas of the Site within the active remediation area (SMU 1) would be dredged to achieve cleanup levels (CULs)/remedial action levels (RALs). A portion of SMU 1 dredging was completed during an Interim Action in 2018. Dredging would remove the sediment to an average depth of 2 to 4 feet below the mudline. The West Marine Walkway would be demolished to facilitate dredging and, if later required, rebuilt for operational use of the marine railway, after sediment remediation is complete. Dredged material would be removed from the aquatic environment for upland landfill disposal or, if appropriate, upland beneficial reuse.*
- ***Excavation and Backfill:*** *Open intertidal areas (SMU 2) would be excavated to an average depth of 3 feet then backfilled to maintain existing elevations. A portion of SMU 2 excavation was completed during the Interim Action in 2018. Excavated material would be removed from the aquatic environment for upland landfill disposal, or upland beneficial reuse if appropriate.*
- ***Under-Pier Granular Cap:*** *The Harris Avenue Pier (SMU 3a), west dock (SMU 3b), and marine railway (SMU 4a and 4b) structures would be retained for future ongoing business operations. An average of 1 to 3 feet of granular capping material would be placed beneath these structures to contain sediment contamination in place. Prior to capping, an average of 3 feet of sediment would be removed from beneath the intertidal section of the marine railway (SMU 4b) by targeted excavation prior to applying the granular cap material beneath this structure up to the top of the railway girders. Excavated material would be removed from the aquatic environment for upland landfill disposal or, if appropriate, upland beneficial reuse.*
- ***Ongoing Monitoring:*** *Ongoing monitoring includes both performance and confirmation monitoring. The selected cleanup also includes long-term monitoring of the intertidal excavation backfill to ensure stability and effectiveness of the constructed granular caps. Long-term*

monitoring would continue as long as contamination remains contained on the Site in excess of cleanup standards.

- ***Institutional Controls:*** *Implementation of institutional controls in the form of requirements to maintain the capped areas and manage exposure to contaminated sediments that were capped in place would be implemented. These include the following:*
    - *Worker health and safety requirements during future redevelopment work in the intertidal area, such as bulkhead wall replacement.*
    - *Limits on overwater operations that may disturb the physical integrity of sediment caps, such as propeller wake restrictions, if deemed necessary through propeller wash analyses.*
    - *Restrictions on digging or other activities that may disturb capped areas and expose contained sediments.*
    - *Evaluation of more permanent remedial actions at the time the pier or marine railway structures are renovated, replaced, or demolished.*

UPLAND CLEANUP ACTIONS – Refer to the attached Site Plan for Cleanup Area (CA) locations (Figure 3).

- ***Shallow Soil Source Removal and Capping:*** *One of the following remedial actions would be implemented in CA 1 where contaminant of concern (COC) concentrations in shallow soil are greater than CULs:*
    - ***Option 1*** *- Removal of the top 2 feet of contaminated soil to support gravel cap placement. Excavated soil would be disposed of off-site at a licensed and permitted facility. A geotextile indicator fabric would be placed in excavated areas to prevent mixing of clean surface gravel with contaminated subsurface material and to provide an indicator layer during any future subsurface work. Excavated areas would then be capped with a compacted gravel surface that meets the site operational requirements.*
    - ***Option 2*** *- Removal of the top 1 foot of contaminated soil to support pavement placement. Excavation depth would vary across the Site based on geotechnical conditions and existing grades. Excavated areas would be backfilled with compacted base course material as necessary, and asphalt pavement would be placed. Stormwater infrastructure would be installed in paved areas for management of stormwater runoff.*
    - ***Option 3*** *- Potential targeted deeper soil source removal, up to 3 to 4 feet bgs, may be conducted in limited areas if it is determined during the remedial design process that doing so would result in meeting CULs, which would reduce long-term costs associated with groundwater attenuation monitoring and with cap maintenance and monitoring.*
- ***Deeper Soil Source Removal:*** *Deeper excavation of copper- and zinc-contaminated soil contributing to copper and zinc exceedances in groundwater would be conducted in CA 2. The extent of soil excavation would be determined in the remedial design stage, based on results of additional data collection.*
- ***Contingency Actions:*** *The following contingency actions may be implemented in CA 2 or CA 3, depending on findings during remedial design:*
    - ***CA 2:*** *Soil solidification/stabilization is a contingency measure that may be conducted in CA 2, if excavation of soil to CULs determined during design is not possible due to geotechnical or other constraints.*
    - ***CA 3:*** *Bioremediation for treatment of groundwater is a contingency measure that may be conducted in CA 3 if remedial design sampling indicates additional cleanup is required in the area of the 2018 Interim Action to address contamination in groundwater.*
- ***Natural Attenuation and Monitoring:*** *The selected cleanup includes natural attenuation of groundwater and long-term monitoring to document conditions until compliance with cleanup standards is achieved.*
- ***Institutional Controls:*** *Implementation of institutional controls in the form of an Environmental Covenant, which would place a number of general and specific prohibitions, restrictions, and*

requirements on activities on parcel(s) at the Site. Institutional controls would also include implementation of an Operations, Management, and Monitoring Plan (OMMP), which would specify soil management procedures and health and safety requirements for future excavation work.

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 located at 201 Harris Avenue, Bellingham, Washington 98225. In-water work would occur on state-owned aquatic lands managed by the Port under a Port Management Agreement (PMA) with the Washington State Department of Natural Resources (WDNR). No tax parcel exists for these aquatic lands. The upland portion of the work would be completed on Port Tenant Parcels 370202398085 and 370202406107. The property is located in the southeast quarter of Section 02, Township 37 North, and Range 2 East. Please refer to Figures 1, 2, and 3 for the proposed project's Vicinity Map, Site Map, and Site Plan.

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 portion of the Site is flat, with little discernable slope. The bathymetry of the aquatic land generally slopes from the uplands to the subtidal areas of the Site. The steepest slope occurring within the Site is located along a vertical retaining wall separating the uplands from the aquatic land.

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.

Soils within the upland portions of the Site lie beneath a layer of asphalt and surficial gravel. Historical fill events procured dredged sediments and upland glacial fill from surrounding areas to construct the current land mass configuration. Underlying soils consist of sands with silts and gravels, and areas of deeper-laying glacial till. No agricultural soils exist in the vicinity of the Site.

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

The City of Bellingham designates the Site as a "Very High" seismic hazard; this is common to sites that are made up of fill and sand/silty soils.

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.

To implement the remedy, the project would require a total of up to approximately 10,000 cubic yards (CY) of soil excavation and placement of up to approximately 10,000 CY yards of upland fill; this would affect a total area of approximately 112,000 square feet (SF) of the upland portion of the Site. All fill material would be procured from local commercial supplies. Specific grading activities are summarized below.

- ***Shallow Soil Source Removal and Capping:*** *Of the three potential remedies that could be implemented in CA 1 to remove shallow soils where COC concentrations exceed CULs, Option 1 (as described in the project description, above) would likely have the greatest grading impact. In order to remove the top 2 feet of contaminated soil to support a gravel cap, up to 9,000 CY of soil would be excavated in CA 1 and disposed of off-site at a licensed and permitted facility. Approximately 9,000 CY of clean gravel would be imported and placed as backfill within the footprint of excavation. This work would affect approximately 107,500 SF of area.*
- ***Deeper Soil Source Removal:*** *The extent of deeper excavation to remove copper- and zinc-contaminated material within CA 2 would be determined in the remedial design stage, based on results of additional data collection. However, it is anticipated that up to 1,000 CY of soil could be removed and up to 1,000 CY of gravel backfill could be placed to implement this remedy. This could affect a total area of up to approximately 4,500 SF.*
- ***Contingency Actions:*** *The following contingency action would have a grading component and could be implemented in CA 2 depending on findings during remedial design:*
    - *Soil solidification/stabilization is a contingency measure that may be conducted in CA 2 if excavation of soil to CULs determined during design is not possible due to geotechnical or other constraints. To implement soil solidification/stabilization, it is anticipated that up to 300 CY of soil could be removed as spoils or to accommodate swell of the material injected into the soil. Backfill would not be placed; rather, gallons of grout or slurry would be injected into the ground. This remedy could affect a total of up to 4,500 SF of area within CA 2.*

Please see the response to question B.3.a.3 for anticipated dredge/fill quantities for the aquatic portion of the Site.

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

Soil erosion could occur during upland ground-disturbing activities. To minimize potential erosion, the contractor would implement erosion and sediment control best management practices (BMPs) identified in a project-specific Temporary Erosion and Sediment Control (TESC) Plan.

The completed project would not increase the potential for erosion. All upland areas subject to ground disturbance would be backfilled and surfaced with gravel or impervious surfaces to prevent erosion; therefore, no long-term erosion impacts are anticipated as a result of implementation of the remedy.

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

The upland portion of the Site is entirely covered in either packed gravel (Ecology considers this as an impervious surface) or asphalt pavement; the remedy would not change this 100-percent impervious condition. Although sediment cleanup would require demolition of the

West Marine Walkway, this structure could be rebuilt. Therefore, a reduction in impervious over-water coverage was not included in this analysis.

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

The proposed project includes the following erosion/earth impact control measures, which would be implemented during construction:

- *A project-specific TESC Plan would be developed and its erosion and sediment control BMPs would be implemented by the contractor.*
- *Where necessary, areas of the Site subject to deep excavations would be shored to prevent collapse of the excavated pits.*
- *Ground-disturbing activities included in the project would comply with the conditions of a project-specific NPDES stormwater construction permit, which would require the contractor to implement appropriate erosion and sediment control BMPs.*

The project would not result in long-term erosion impacts. This would be ensured through placement of gravel or other impervious surfacing over upland areas subject to ground disturbance. Impervious surfacing would prevent the migration of soils post-construction.

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.

Emissions Associated with Remedy Implementation and Ongoing Monitoring/ Maintenance

During implementation of the remedy, heavy equipment and vehicle traffic may generate particle pollution from dust and emissions that includes nitrogen oxides (NOx), carbon monoxide (CO), and PM10 (dust). The release of pollution would be temporary, limited to the duration of construction, and localized at the Site.

Ongoing monitoring of the implemented remedy would be a source of emissions produced by the completed project. Monitoring would require periodic vehicle trips to and from the Site until CULs are achieved. Ecology would also periodically visit the Site to inspect the constructed remedy to verify that it remains effective. The vehicle trips produced by these activities would not result in a significant source of air emissions.

Existing Air Impacts to Be Controlled by the Proposed Remedy

Existing volatile contaminants in the unsaturated soil column at the Site currently have the potential to migrate through natural mechanisms and discharge into indoor air; however, this is currently a low risk given that all identified soils with volatility potential (petroleum) are more than 30 feet away from any occupied below-grade foundation or slab-on-grade buildings with office and work spaces. The remedy would not exacerbate this condition; rather, the remedy would remove or attenuate the contaminated media that could cause air impacts in the future.

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

The are no offsite sources of emissions or odor that would affect the project.

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

Air Impact and Emissions Reduction/Control Measures During Project Construction

During construction, TESC measures would be implemented by the contractor to control fugitive dust release. Contractor staging/laydown would also be located in proximity to the job site and, where possible, vehicles would not be allowed to idle; these measures would reduce vehicle emissions.

Measures to Control Post-Construction Air Impacts

The remedy includes implementation of institutional controls in the form of an Environmental Covenant, which would place a number of general and specific prohibitions, restrictions, and requirements on activities at the Site. This would include a requirement that, prior to any future Site development involving occupied structures, soil vapor risk would be evaluated in consultation with Ecology using the most current and appropriate soil vapor guidance documents. Mitigation measures, if determined necessary, would be installed for prevention of vapor intrusion.

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 aquatic portion of the Site is located within Bellingham Bay. Bellingham Bay is an embayment of the Salish Sea. There are no other surface waters located on or near the Site.

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, all work described in the project description as being within an SMU, and a majority of the upland work would occur within, or within 200 feet of Bellingham Bay. Construction activities include dredging, backfilling, excavating, demolition, and potentially structure replacement. Please refer to the project description and site plan (Figure 3).

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 remedy would require dredging and placement of clean fill material within Bellingham Bay. Specific dredge/fill activities are summarized below.

- ***Dredging.*** *Accessible open water areas of the Site within SMU 1 would be dredged to achieve CULs/RALs. Dredging would remove sediment to an average depth of 2 to 4 feet below mudline. This would result in the total removal of approximately 20,000 CY of sediment from Bellingham Bay. Dredged material would be removed from the*

aquatic environment for upland landfill disposal or, if appropriate, upland beneficial reuse.

- ***Excavation and backfill.*** *Open intertidal areas below the mean higher high water (MHHW; SMU 2) would be excavated to an average depth of 3 feet then backfilled to maintain existing elevations. This work would require the removal of approximately 1,000 CY of sediment and would require placement of approximately 1,000 CY of clean backfill. Excavated material would be removed from the aquatic environment for upland landfill disposal, or upland beneficial reuse if appropriate.*
- ***Under-Pier Granular Cap.*** *The Harris Avenue Pier (SMU 3a), west dock (SMU 3b), and marine railway (SMU 4a and 4b) structures would be retained for future ongoing business operations. An average of 1 to 3 feet of granular capping material would be placed beneath these structures to contain sediment contamination in place. Prior to capping, an average of 3 feet of sediment would be removed from beneath the intertidal section of the marine railway (SMU 4b) by targeted excavation prior to applying the granular cap material beneath this structure up to the top of the railway girders. This work would result in the removal of approximately 200 CY of sediment and placement of approximately 1,500 CY of clean backfill.*

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

The proposed project would 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.

Yes, according to Federal Emergency Management Agency Flood Insurance Rate Maps, Panel 53073C1632E, the aquatic portion of the Site, and areas immediately upland, are located within Zone AE (100-year floodplain).

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, the project does not include any planned discharge of waste materials to surface waters.

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.

Ongoing groundwater monitoring (which requires minor groundwater withdrawal) would be conducted following remedy implementation. Although the exact amount of groundwater withdrawn from groundwater wells is unknown, the volume of groundwater withdrawn would be negligible. Discharges to groundwater would not occur. Groundwater would not be withdrawn for drinking water use.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the

number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

The project would not discharge waste material 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.

Currently within the Site, stormwater from roof runoff and impervious surfaces is split between paved areas with stormwater conveyance and treatment systems, gravel areas that allow infiltration, the marine railway area, and areas that sheet flow to Bellingham Bay. Stormwater is managed as follows:

- *There are no current operations at the facility so stormwater from the marine railway area drains to Bellingham Bay.*
- *Stormwater that falls on the paved portions of the shipyard is conveyed to the stormwater treatment system where it is treated via settling prior to discharge to the sanitary sewer system. This includes stormwater that falls on the roofs of the hazmat storage area, the sandblast shed, and the spent sandblast grit storage area.*
- *Stormwater and process water that falls on the vehicle washdown pad is treated with an oil/water separator and then discharged to the sanitary sewer.*
- *Stormwater that falls on all other roofs in areas not discussed in the bullets above drains to gravel areas and infiltrates or sheet flows directly to Bellingham Bay.*
- *Stormwater that falls on the former All American building, on the north half of the Fairhaven Shipyard maintenance and fabrication shop (building connected to the Former All American building running parallel to the southern property boundary) roof, and in the parking area located east of the former All American building, north of the Fairhaven Shipyard maintenance and fabrication shop and south of the sandblast shed on the Puglia parcel, drains to catch basins. These catch basins are part of a stormwater conveyance system that is managed by the Port. This stormwater is managed under the Port's NPDES Phase II Municipal Stormwater General Permit.*
- *Stormwater that falls on the west side of the roof of the former All American building and in the gravel parking lot on the west side of the former All American building drains to catch basins that run along the west side of the building. Stormwater from these catch basins discharges at a single outfall to Bellingham Bay located along the western portion of the shoreline, west of the former All American building. Stormwater discharge from the west side of the former All American building is covered under the Port's NPDES Phase II Municipal Stormwater General Permit.*

These conditions would not be substantially altered as a result of project implementation.

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

During upland construction, it is possible that waste materials could enter surface waters. Although proper stormwater and erosion control measures would be installed by the contractor prior to initiation of ground-disturbing activities, there is the potential for small amounts of material to flow off site toward surface waters despite these preventive measures. In addition, the contractor would comply with BMPs established in a Spill Prevention, Control, and Countermeasure (SPCC) Plan to prevent, prepare for, and

respond to any incidental spills that may occur at the Site. Waste materials generated by the completed project are not anticipated to enter groundwater or surface waters.

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

Given that the Site is entirely covered by impervious surfaces, the proposed remedy would have negligible effect on site-wide drainage patterns. However, if Option 2 is implemented, to remediate shallow soil in CA 1, new asphalt pavement would be placed. This would require new stormwater infrastructure that would be installed in paved areas for management of stormwater runoff. This stormwater infrastructure would tie into the existing system and would have no measurable effect on drainage patterns.

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

A project-specific TESC and SPCC Plan would be prepared; the BMPs outlined in this plan would be implemented by the contractor to reduce or control stormwater runoff during construction.

If Option 2 in CA 1 is implemented, excavated areas would be backfilled with compacted base course material as necessary, and asphalt pavement would be placed. This would require installation of new stormwater infrastructure in paved areas for management of stormwater runoff. If new stormwater infrastructure is required, it would tie into the existing systems on the Site and would not substantially change runoff management or drainage patterns.

4. Plants [help]

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

____deciduous tree: alder, maple, aspen, other
____evergreen tree: fir, cedar, pine, other
____shrubs
____grass
____pasture
____crop or grain
____ Orchards, vineyards or other permanent crops.
____ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
__X__water plants: water lily, eelgrass, milfoil, **other**: *Sea lettuce*
__X__other types of vegetation

The upland portion of the Site is almost entirely covered with impervious surface (gravel, asphalt, and structures). Therefore, there is little to no upland vegetation present. Within the aquatic portion of the Site, marine vegetation including macroalgae species such as sea lettuce (Ulva fenestrata), and other aquatic vegetation species are present.

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

No upland vegetation would be removed. Dredging and excavation below the MHHW would result in the removal of aquatic vegetation species.

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

There are no documented threatened or endangered plant species on or within the direct vicinity of the Site.

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

The project does not include a landscaping or planting component. No vegetation preservation measures are proposed as only negligible impacts to marine vegetation would occur.

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

There are no known noxious or invasive plant species on or in the direct vicinity of the Site.

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: *Harbor seal*
fish: bass, salmon, trout, herring, shellfish, other *Forage fish*

The upland portion of the Site is industrial in nature and does not provide suitable habitat for most animals. However, the aquatic portion of the Site is located within Bellingham Bay, which provides suitable habitat for a multitude of species.

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

The following candidate threatened or endangered species may occur in Bellingham Bay:

Common Name	***Scientific Name***	***ESA Listing Status***
Chinook Salmon	*Oncorhynchus tshawytscha*	*Threatened*
Steelhead	*Oncorhynchus mykiss*	*Threatened*
Bull Trout	*Salvelinus confluentus*	*Threatened*
Orca	*Orcinus orca*	*Endangered*
Humpback Whale	*Megaptera novaeangliae*	*Endangered*
Boccaccio	*Sebastes paucispinis*	*Endangered*
Yelloweye Rockfish	*Sebastes ruberrimus*	*Threatened*
Canary Rockfish	*Sebastes pinniger*	*Threatened*
Marbled Murrelet	*Brachyramphus marmoratus*	*Threatened*

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

Yes. The general project area is located within the Pacific Flyway, a broad migratory corridor that extends from Alaska to South America, which is used by waterfowl, eagles, hawks,

falcons, songbirds, and shorebirds. The Site is also located in and adjacent to Bellingham Bay, which is part of a migratory corridor for many aquatic species.

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

In-water work would be conducted during the allowable in-water work window to avoid/minimize impacts to ESA-listed species. In addition, implementation of the project would result in a net benefit to animals and their environs through removal of contaminated material.

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

There are no known invasive animal species on or near the Site.

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.

Once construction is complete, minor amounts of fossil fuels would be consumed for the duration of monitoring of the remedy. No other energy or natural resource needs would occur as a direct result of the project.

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

The project does not include the construction of new vertical structures that would preclude adjacent properties' ability to use solar energy.

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:

During project construction, practices to encourage efficient energy use, such as limiting equipment idling time and locating construction staging/laydown areas in proximity to the work area would be implemented. The completed project would not result in adverse energy or natural resource impacts; therefore, no long-term energy/resource conservation measures are required or proposed.

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 proposed project is to implement a cleanup action to remediate sediment, soil, and groundwater contamination to prescribed CULs. In the short-term, project construction would require excavation/dredging and handling of contaminated media; this could temporarily increase construction personnel's' potential for exposure to environmental health hazards. In addition, construction activities would require use of heavy machinery that requires fossil fuels for operation; use of this machinery could result in an increase in spill or

fire potential. This work would be conducted by personnel with the appropriate training and experience for working with contaminated soil, groundwater, and sediment.

Long-term contamination capped or left on-site could pose a risk during subsurface work on or redevelopment of the property. In addition, long-term monitoring of caps and groundwater conditions would occur. During these monitoring events, there would be an increased risk of worker exposure to environmental health hazards in the form of contaminated sediments/soils and groundwater. This work would be conducted by environmental professionals with training and experience working with contaminated media.
Short- and long-term environmental health concerns resulting from the proposed project would be controlled or mitigated to the maximum extent practicable, as discussed in question B.7.a.5, below.

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

   The project is located within the boundaries of a MTCA site that is regulated by Ecology. The property would be remediated in accordance with Ecology MTCA Agreed Order No. 7342 for upland and sediment contamination resulting from historical use of the property as a shipyard dating back to 1915 and other historical industrial uses back to the early 1900s.

   Sediment contamination at the Site includes metals (arsenic, cadmium, copper, zinc), carcinogenic PAHs (cPAHs), high molecular weight PAHs (HPAHs; fluoranthene, pyrene), and PCBs. Upland soil and groundwater contamination includes metals (arsenic, copper, zinc), TPH, and low molecular weight PAHs (LPAHs; 1-methylnaphthalene).

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

   There are no known hazardous liquid or gas transmission pipelines in the area subject to construction; however, as mentioned above, the Site does contain contamination. The purpose of the project is to remove or immobilize the existing contamination; however, the process for actively remediating the Site could temporarily increase the amount of contaminated material that workers could be exposed to.

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

   No new toxic or hazardous chemicals would be stored, used, or produced during construction activities or monitoring at the Site.

4) Describe special emergency services that might be required.

   The project would not require special emergency services.

5) Proposed measures to reduce or control environmental health hazards, if any:
   The overall cleanup action, including construction and long-term monitoring, would be implemented in accordance with state and federal regulations governing the safety of workers implementing remedies at hazardous waste sites. These consist of the following:

- *Health and Safety for Hazardous Waste Operations and Emergency Response (HAZWOPER), Chapter 296-62 WAC, and Health and Safety, 29 CFR 1901.120*
- *Occupational Safety and Health Act (OSHA)*
- *Washington Industrial Safety and Health Act (WISHA), Chapters 296-62 and 296-155 WAC; Chapter 49.17 RCW*

During project construction, excavated soils and dredge material would be managed and disposed of in coordination with Ecology. In addition, BMPs would be implemented by the contractor to ensure that contaminated media is not inadvertently transported off site through erosion or stormwater.

Institutional controls would be implemented for long-term control of environmental health hazards. An Environmental Covenant would be established, which would place a number of general and specific prohibitions, restrictions, and requirements on activities on parcels at the Site.

b. Noise

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

This cleanup action would not be affected by existing noise sources.

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.

Short-term noise would result from project construction, which would generally consist of heavy machinery, barges, back-up alarms, and truck/personal vehicle traffic. This noise would be temporary, would generally occur during normal working hours, and would be consistent with the industrial nature of the surrounding area the Site is located within.

Long-term, monitoring would not be a significant producer of noise. No project component would produce noise noticeable above the ambient noise generated by the surrounding land uses.

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

Construction activities would comply with local noise ordinances. In-water work would be conducted during the allowable in-water work window to avoid/minimize adverse impacts to ESA-listed species.

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 current use at the Site is marine-industrial, which supports a shipyard and other marine-related uses. Nearby land uses include a ferry terminal, boat launch, marine park, and railroad. The project includes implementation of an Environmental Covenant that restricts and limits future site uses to those compatible with the implemented cleanup remedy. The project would not affect land uses adjacent to the Site.

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 Site has not been used as a working farm or forest land.

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 would not affect or be affected by farm or forest land operations. There are no active farm or forest lands in the vicinity of the Site.

c. Describe any structures on the site.

Generally, the Site contains piers, marine railway, and upland support service shops such as a machine shop, electrical shop, steel fabrication and mechanical shop, valve shop, sandblast shed, paint shop, and water treatment building.

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

Yes, one over-water structure (the West Marine Walkway) located just east of the marine railway would be demolished to accommodate dredging. If required after remediation, the structure would be rebuilt to support operational use of the marine railway.

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

The Site is zoned Fairhaven Urban Village: Industrial (I-1).

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

The Site contains a Fairhaven Urban Village comprehensive plan designation.

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

The Shoreline Master Program designation for the portion of the Site within 200 feet of the MHHW, is Urban Maritime – Water Oriented Uses.

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

According to the City of Bellingham Critical Areas Ordinance and online mapping tools, the Site is located within the following critical areas:

- *Frequently flooded areas (portions of the Site within the 100-year floodplain)*
- *Geologically hazardous areas ("Very High" seismic risk)*
- *Fish and wildlife habitat conservation areas (Bellingham Bay)*

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

The project would not change work or housing availability at the Site.

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

The project would not displace existing residents or workers.

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

No displacement impacts would occur; therefore, no impact reduction or avoidance measures are proposed.

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

The project is a cleanup action. The existing land use would not change at the Site and no new development would occur that would have an impact on existing or future land uses.

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

No impacts would occur to agricultural or forest lands; therefore, no mitigation or control measures are proposed.

9. Housing [help]

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

The implemented remedy would not provide housing.

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

The implemented remedy would not eliminate housing.

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

No housing impacts would occur; therefore, no control measures are proposed.

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 project does not include the construction of vertical structures. If the West Marine Walkway were to be reconstructed after remedy implementation, it would be in-kind to the existing structure.

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

The removal of the West Marine Walkway would improve views of this industrial area; however, if this structure is replaced in the future, then views would remain substantially similar to what currently exists at the Site.

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

No aesthetic impacts would occur; therefore, no impact control or reduction measures are proposed.

11. Light and Glare [help]

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

Project construction would result in additional personal vehicles and construction machinery/equipment compared to the existing conditions; this could result in a negligible increase of light/glare during low light conditions, localized to the Site. A negligible increase of light/glare would remain consistent with the overall industrial nature of the area for which the Site is located within.

The completed project would not result in an increase of light or glare.

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

No. The proposed project would not result in light or glare that could constitute a safety hazard or interfere with views.

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

No existing sources of light or glare would affect the project.

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

The project would not result in light or glare impacts; therefore, no light or glare reduction/control measures are included with the proposal.

12. Recreation [help]

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

There are two designed recreational sites within the vicinity of the Site: Marine Park and a boat launch approximately 1,100 feet to the east of the Site. Informal recreational opportunities in the area include Bellingham Bay, which provides boating and angling opportunities, to name a few.

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

No existing recreational uses would be displaced by the project.

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

No recreational impacts would occur; therefore, no recreation impact control or reduction measures are proposed.

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.

A records search and literature review were conducted by Historical Research Associates (HRA 2011), which resulted in no recorded structures within the project area listed in national, state, or local preservation registers. However, according to the Washington Department of Archaeology and Historic Preservation (DAHP) online WISAARD mapping tool, there are two structures within the Site that have been determined eligible for listing (listed as the Northwestern Shipbuilding Company Building and its associated pier). The project would not remove or alter these structures.

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.

In 2011, during soil sample boring and installation of monitoring wells, HRA observed cultural materials including isolated metal, brick, and glass artifacts in the historic-period fill layers; these were expected and largely isolated finds, and they were not formally recorded as an archaeological site. However, intact piling or some other wooden structural element was also observed and HRA noted the presence of buried concrete features. If, during future site work, these are determined to be intact foundations associated with the Hackett Cold Storage Company (historic site use) they may be formally recorded as an archaeological site, pending further archaeological evaluation. (Archaeological Monitoring for the Proposed Harris Avenue Shipyard Supplemental Site Investigation, Whatcom County, Washington, HRA, 2011).

There was also an inadvertent discovery at the Site in 2017 during implementation of the Interim Action. A State of Washington Archaeological Site Inventory Form was submitted to DAHP for this discovery.

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

A literature review was conducted in 2011 by professional historians and archaeologists to develop probabilities for encountering resources of varying ages and to provide context for historic and pre-historic resources, should any be observed during remediation (HRA 2011). A desktop review was conducted in 2020 to confirm the listing eligibility status of structures within the Site.

HRA conducted archaeological monitoring of boring/well installation activities in the uplands in 2011. The information gathered during this event and the information obtained during the subsequent implementation of the Interim Action would inform the process of preparing a site-wide Monitoring and Inadvertent Discovery Plan (MIDP) for the project to ensure that the appropriate areas are monitored and that procedures are in place in case of an inadvertent discovery of archaeological materials and/or human remains.

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.

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

Per the Section 106 process, project proponents would maintain lines of communication with the DAHP, USACE, affected Indian Tribes, and other interested parties.

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.

Harris Avenue provides access to the Site. The project would not alter existing street access.

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?

Whatcom Transportation Authority is the local public transit provider in this area. Route 105 provides service from Fairhaven to downtown Bellingham. The nearest stop is located approximately 900 feet to the east at the Fairhaven Transportation Center.

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 would not add or remove existing formal parking.

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 would not require new roads or improvements to existing roads.

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

The Site is located within the vicinity of formal water (Bellingham Cruise/Ferry Terminal) and rail (BNSF Railway) transportation.

Remedy implementation would require the use of barges. The project may also involve using rail transportation for the transport of material to an approved upland landfill. These uses would be temporary and would end once implementation of the remedy is complete. The project would 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?

The completed project is expected to result in no net change in traffic.

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

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

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

The completed project would not result in transportation impacts; therefore, no transportation impact reduction or control measures are proposed. During construction, a Traffic Control Plan would be developed and implemented to reduce transportation impacts during remedy implementation.

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.

The project would not increase the need for public services.

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

No impacts to public services from remedy implementation is anticipated; therefore, no measures to reduce or control direct impacts on public services are proposed.

16. Utilities [help]

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

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

The project may require use of water, sanitary sewer, and electricity that is currently available on site; this would be limited to the duration of construction and no alterations to the existing systems would occur. No other utilities are anticipated to be required.

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 _ _____
Position and Agency/Organization _____
Date Submitted: _____