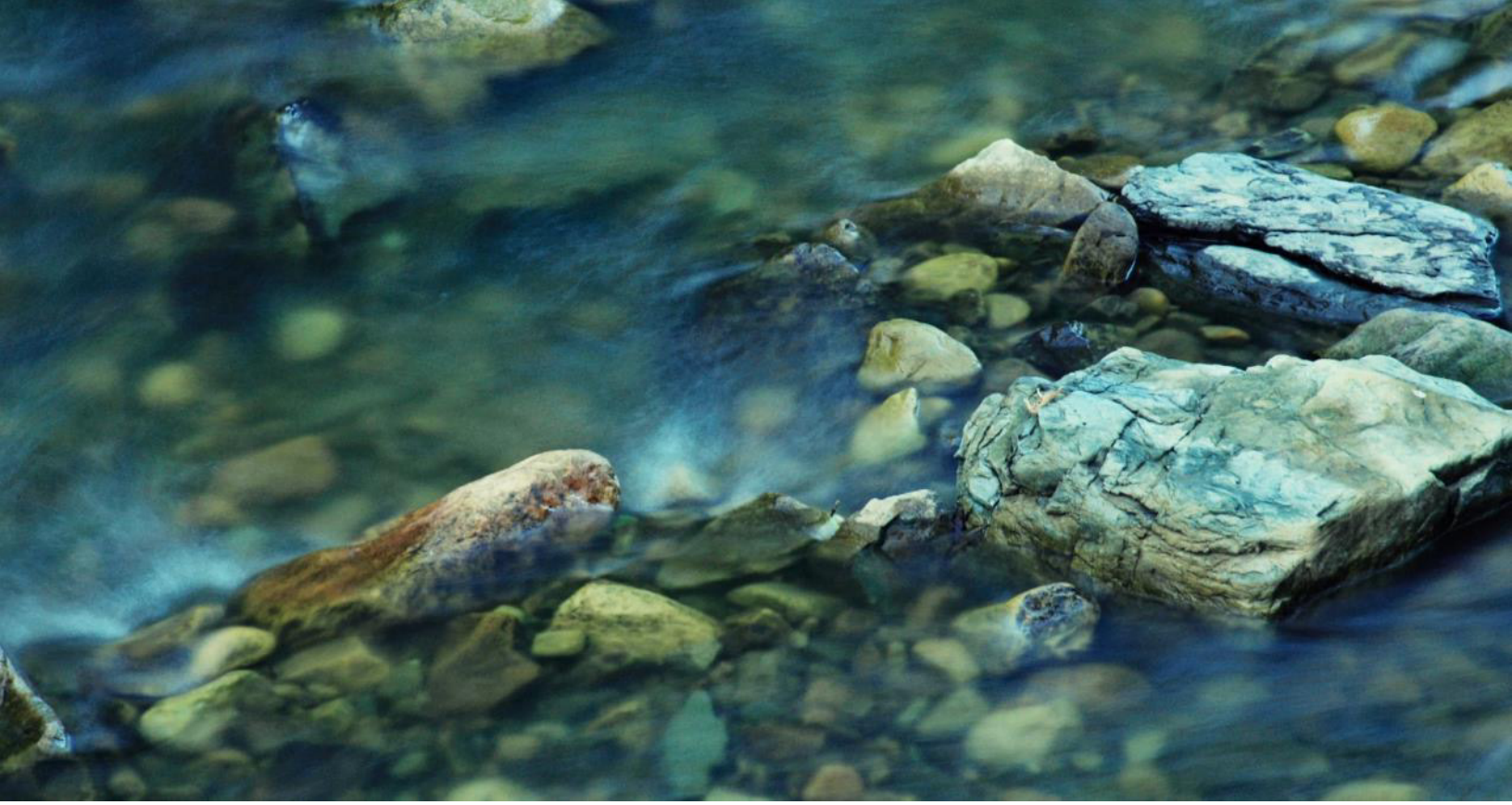

July 2023
Port of Grays Harbor Terminal 4 Expansion and Redevelopment Project

ANCHOR QEA

State Environmental Policy Act Checklist

Prepared for Port of Grays Harbor and Ag Processing, Inc.

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TABLES

ATTACHMENTS

ABBREVIATIONS

AGP	Ag Processing, Inc.
AGP Project	Ag Processing, Inc., Operations Expansion at Terminal 4
AMC	Aberdeen Municipal Code
BMP	best management practice
BNSF	Burlington Northern Santa Fe
CAO	Critical Areas Ordinance
CAP	criteria air pollutant
CFR	*Code of Federal Regulations*
CH_4	methane
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
dB	decibel
dBA	A-weighted decibel
DPS	distinct population segment
Ecology	Washington Department of Ecology
ESU	evolutionarily significant unit
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
GHG	greenhouse gas
HMC	Hoquiam Municipal Code
ISGP	Industrial Stormwater General Permit
JARPA	Joint Aquatic Resources Permit Application
kg	kilogram
lb	pound
MT	metric ton
NA	not applicable
NAAQS	National Ambient Air Quality Standards
NAD83	North American Datum of 1983
NHPA	National Historic Preservation Act
NOAA	National Oceanic and Atmospheric Administration
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
PIR	Port Industrial Road
PM	particulate matter

Port	Port of Grays Harbor
Port Project	Rail Upgrades and Site Improvements, Terminal 4A Cargo Yard Relocation and Expansion, and Terminal 4 Dock Fender and Stormwater Upgrades
Proposed Project	Port of Grays Harbor Terminal 4 Expansion and Redevelopment Project
PSAP	Puget Sound & Pacific Railroad
PSD	Prevention of Significant Deterioration
RCW	Revised Code of Washington
ROG	reactive organic gases
RORO	roll-on/roll-off
SEPA	State Environmental Policy Act
SO_2	sulfur dioxide
SPCC	Spill Prevention Control and Countermeasures
T4	Terminal 4
T4A	Terminal 4A
T4B	Terminal 4B
TESC	Temporary Erosion and Sediment Control
tpy	tons per year
USFWS	U.S. Fish and Wildlife Service
VdB	velocity decibel
WAC	Washington Administrative Code

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 Find help answering background questions

1. Name of proposed project, if applicable:

Port of Grays Harbor (Port) Terminal 4 (T4) Expansion and Redevelopment Project (Proposed Project)

2. Name of applicant:

Applicant 1: Port of Grays Harbor

Applicant 2: Ag Processing, Inc. (AGP)

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

Randy Lewis
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Direct: (360) 533-9513
Fax: (360) 533-9505

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Omaha, NE 68154
(402) 498-2254

4. Date checklist prepared:

May 2023

5. Agency requesting checklist:

Port of Grays Harbor

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

Construction is expected to commence in 2024 and is expected to be completed in 2025. Attachment A presents maps showing the location of the Proposed Project where construction activities would occur. Attachment B includes preliminary design drawings for Proposed Project elements.

The phasing of the Proposed Project would be sequenced in a manner that allows rail traffic to continue throughout the construction timeline, and to find the most efficient way of construction moving forward. For construction sequencing, the Project Area will be broken into 10 discrete work zones to allow clarity in communication and construction scheduling. Work will be coordinated between work zones to minimize conflicts, with work related to site access, long construction duration, and critical path scheduling being prioritized. Construction would proceed through work zones around the Project Area in a clockwise fashion as described in detail in the *Project Description Technical Report* (Attachment C).

As large construction projects commence, there is always a lead time for workforce and equipment. Weather plays a large factor in the work as well, along with in-water work windows. These two items will dictate the shiploader substructure and fender system construction timeline. These considerations are not included in this narrative but will be referenced once the staging schedule progresses in the future.

All in-water work will occur within the approved in-water work windows for the Proposed Project (July 16 through February 14 for marine waters of Grays Harbor – Tidal Reference Area 16 [all saltwater in Grays Harbor easterly of 123 degrees 59 minutes W longitude and westerly of the Union Pacific Railroad bridge across the Chehalis River]).

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

The Proposed Project would result in upgrades in the Port terminal and rail infrastructure, including increasing the capacity of the current rail loop, upgrading the existing T4 dock with new dock fenders and a shiploader, and replacing backland cargo storage capacity lost to the expanded rail footprint by redeveloping the vacant 55-acre industrial site to the east of T4. These improvements are needed to support Port economic resiliency and to increase the Port's operational capacity and efficiency to support increased growth, job creation and retention, and economic opportunities related to multimodal port operations, including the expansion of AGP's agricultural export facilities, ship loading productivity, storage capacity, and the efficient movement of goods through the Port. Although the increase in Port capacity could lead to additional new activity at the Port and potentially new facilities to support increased activity, there are no current plans for future additions, expansion, or further activity specifically related to or connected with this proposal.

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

The following technical studies and reports related to this proposal have been prepared and are attached to this checklist. All items listed below are available on the Port's website at https://www.portofgraysharbor.com/t4-project.

- *Project Description Technical Report* (Attachment C)
- *Air Quality and Greenhouse Gas Emissions Technical Study* (Attachment D)

- *Biological Resources Technical Study* (Attachment E)
- *Geologic Hazards Report* (Attachment F)
- *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G)
- *Noise and Vibration Technical Study* (Attachment H)
- *Public Services and Utilities Technical Study* (Attachment I)
- *Vehicle Traffic and Safety Technical Study* (Attachment J)
- *Vessel Traffic Technical Study* (Attachment K)
- *Water Resources Technical Study* (Attachment L)
- *Cultural Resources Technical Report* (Attachment M)
- *Biological Assessment*, (Attachment N)
- *High Tide Line and Ordinary High Water Mark Determination* (Attachment O)
- Request for Incidental Harassment Authorization (Attachment P)
- Joint Aquatic Resources Permit Application (JARPA) (Attachment Q)
- *Wetland and Stream Delineation Report* (Attachment R)
- *Hazardous Materials Summary Report* (Attachment S)

The following information will be prepared for the proposed project and would be submitted to the appropriate agency for consideration:

- National Environmental Policy Act Environmental Assessment
- Clean Water Act Section 404(b)(1) Alternatives Analysis
- Hydraulic Project Approval application package
- Construction Stormwater General Permit
- Industrial Stormwater Permit
- Coastal Zone Management Act Consistency Determination
- Olympic Region Clean Air Agency Air Permit Notice of Construction
- Stormwater Pollution Prevention Plan
- Water Quality Monitoring and Protection Plans
- Temporary Erosion and Sediment Control Plans
- Spill Prevention Control and Countermeasures (SPCC) Plan
- Cities of Aberdeen and Hoquiam Land Use Permit Applications
- Cities of Aberdeen and Hoquiam Shoreline Permit Applications
- Cities of Aberdeen and Hoquiam Critical Areas Assessments
- Cities of Aberdeen and Hoquiam Construction Building Permit Applications

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 no known pending applications for other projects or proposals directly affecting the property for the Proposed Project.

This State Environmental Policy Act (SEPA) Checklist also considers the potential for cumulative impacts of the proposed project. A number of other projects are currently in progress or are expected to occur in the foreseeable future, regardless of whether the Proposed Project proceeds. The impacts of these projects have the potential to contribute to a cumulative impact on resources when combined with the impacts of the proposed project. The contribution of the proposed project to cumulative impacts is discussed under each environmental element section of the checklist.

A list of cumulative projects are provided below. A full description of each of the cumulative projects can be found in Section 4.1 of the *Project Description Technical Report* (Attachment C).

- Puget Sound & Pacific (PSAP) Railroad Annual Maintenance and Improvements
- North Aberdeen Bridge Replacement
- Aberdeen U.S. 12 Highway-Rail Separation
- Fry Creek Restoration and Pump Station
- U.S. 101 Fry Creek Culvert Replacement
- Port Industrial Road (PIR) Pavement Preservation Project
- U.S. 12 Heron Street Bridge Rehabilitation
- Aberdeen-Hoquiam Flood Protection Project
- Westport Marina Modernization Project

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

The following permits and approvals would need to be considered for approval by the appropriate federal, state, or local agency.

Federal Approvals/Permits

- Section 7 of the Endangered Species Act consultation for the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service
- Incidental Harassment Authorization under the Marine Mammal Protection Act as administered by the National Marine Fisheries Service and USFWS
- Section 106 of the National Historic Preservation Act consultation for the Washington Department of Historic Preservation, affected Native American tribes, and other interested parties
- Section 404 of the Clean Water Act authorization from the U.S. Army Corps of Engineers
- Section 10 of the Rivers and Harbors Act permit from U.S. Army Corps of Engineers
- Section 4(f) of the U.S. Department of Transportation Act compliance overseen by the U.S. Maritime Administration
- Aviation evaluation for the Federal Aviation Administration (anticipated to require coordination but not a permit)

State Approvals/Permits

- Coastal Zone Management Act, which is administered by the Washington Department of Ecology (Ecology) and requires a certification of consistency
- Clean Water Act Section 401 authorization from Ecology
- Hydraulic Project Approval from the Washington Department of Fish and Wildlife
- Aquatic Use Authorization for State-Owned Aquatic Land from the Washington Department of Natural Resources (anticipated to require consistency with the existing Port Management Agreement and will require coordination with the Washington Department of Natural Resources but will not require a permit)
- Port of Grays Harbor State Environmental Policy Act Notice of Action
- National Pollutant Discharge Elimination System (NPDES) permitting for construction and operations

Local Approvals/Permits

- Order of Approval for the Olympic Region Clean Air Agency
- Critical Areas Permit or Statement of Exemption for the City of Hoquiam and the City of Aberdeen
- Shoreline and Land Use Approvals for the City of Hoquiam and the City of Aberdeen
- City of Hoquiam and Aberdeen Building and Development Permits (as described in Appendix A of the *Project Description Technical Report* [Attachment C])

11. Give a 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 following is a general description of the Proposed Project. The *Project Description Technical Report* (Attachment C) is attached to this SEPA Checklist and includes additional detailed information regarding the Proposed Project, including maps depicting the size and location of the Proposed Project elements. Figure 1 of Attachment A shows the Project vicinity.

Project Area

The Project Area consists of the area where the proposed facilities would be located, called the On-Site Project Area, and the existing off-site transportation corridors, called the Off-Site Project Area. The On-Site Project Area includes the area that will be directly affected by construction and operation of the Proposed Project. The Off-Site Project Area includes off-site transportation corridors used for rail and vessel transportation. This includes the PSAP line from the Port property to the connection with the Burlington Northern Santa Fe (BNSF) Railway and Union Pacific Railroad mainlines in Centralia, Washington, and the Chehalis River and Grays Harbor federal navigation channel from the Port property, through Grays Harbor, to the Pacific Ocean, up to 3 nautical miles offshore from the southern mouth of Grays Harbor. The Proposed Project will likely include rail construction on property owned by others (PSAP or other owners) along the PSAP rail corridor east of West Heron Street.

Proposed Project

The Proposed Project consists of Port-led improvements and the AGP operations expansion at T4 (known as the AGP Project). The Port improvements include the following: 1) rail upgrades; 2) T4 cargo yard relocation and expansion; and 3) dock fender and stormwater upgrades. AGP's project consists of constructing a new export terminal at T4 to accommodate an increase in exports through the Port. Figure 3 of Attachment A depicts the proposed project elements. The size of the Project Area including where improvements and upgrades will be made for the four project elements identified above is approximately 65 acres. The Proposed Project could be constructed in phases and does not include expansion or deepening of the Grays Harbor federal navigation channel.

Rail Upgrades and Site Improvements

Figures 4A through 4C of Attachment A depict the proposed rail upgrades and site improvements. The rail upgrades will increase capacity for all port users and will ensure that each terminal could operate unimpeded by unit trains on neighboring loops. The rail upgrades involve construction of up to 50,245 linear feet of new rail at the Port's existing loop track facility. The upgrades also include a new rail loop route through the terminal, new storage tracks, modification of existing storage tracks, new fencing and a security guard station, rail crossing modifications, access roads and secure site access improvements, and stormwater improvements. The rail upgrades will increase the efficiency of the movement of goods through the Port. The rail upgrades will increase efficiency of unit train offloading, railcar storage, and unit train assembly.

The rail upgrades will allow for the sequenced throughput of an inbound unit train from the time the loaded train arrives to the Port until the time that the empty train departs the Port. This will improve the operational efficiency of rail operations at the Port. The site will be improved to enhance multimodal transportation flow between Terminal 4A (T4A) and the expanded cargo laydown area.

Once the rail upgrades are operational, loaded trains will enter T4 from the east or west and may either be put onto storage tracks for later unloading or staged at the new rail receiving building for immediate unloading. Operational scenarios are described in further detail in the *Project Description Technical Report* (Attachment C).

Terminal 4A Cargo Yard Relocation and Expansion

The cargo laydown area at T4A will be redeveloped to further optimize port operations. The 50-acre former casting basin will be repurposed into a cargo yard, where breakbulk and roll-on/roll-off (RORO) cargos will be relocated. Figure 5 of Attachment A depicts the proposed T4A Cargo Yard Relocation and Expansion.

The work to be performed at the T4A site includes filling the former casting basin and upgrading surface treatments and drainage as necessary to create a cargo laydown yard with a combination of paved and gravel surfaces. After the improvements are made, the site will be suitable for breakbulk and RORO cargo storage. In addition to filling the casting basin, drainage at the T4A site will be modified as necessary to meet City of Aberdeen stormwater management requirements. The Proposed Project will utilize the existing stormwater infrastructure to the maximum extent practical. The tide gate that separates the casting basin from the harbor would not be removed as part of the Proposed Project.

Terminal 4 Dock Fender and Stormwater Upgrades

The Port is proposing to upgrade the dock fender and stormwater systems at T4. This is referred to as the T4 dock fender and stormwater upgrades. The proposed upgrades by AGP at Terminal 4B (T4B) will support existing and future uses at T4A and will help to minimize in-water obstructions. Figure 6 of Attachment A depicts the extent of the proposed dock fender and stormwater upgrades.

The fender system design will continue to accommodate the mix of vessels that currently call on the terminal. The existing timber- and steel-pile fender system will be replaced with a modern pile-supported panel system at Berth A and a modern suspended panel system at Berth B where the shiploader will be located. Upgrades to the fender system will allow larger ships to use to facility by providing an increased capacity to resist the larger berthing forces generated by these vessels. The increased capacity of the new fender systems along the entire T4 wharf will reduce the potential of damage to the dock.

As the design process progresses, it is possible that the fender design could be refined to include upgrades at T4A that would allow for the dock to accommodate barges. If implemented, this refinement would require the modification of up to three of the proposed fenders along the dock. The three fenders would be lengthened and reinforced, allowing barges to dock.

Stormwater from T4 currently discharges to the Chehalis River via dock drains on T4 and catch basins in the adjacent upland area with corresponding outfalls. The Port proposes to install a stormwater treatment and conveyance system at the T4 dock and portions of the upland drainage area. T4B will have a new outfall discharging stormwater to the Chehalis River. The proposed system has been designed to provide stormwater runoff treatment meeting the pollutant benchmark values established under the Industrial Stormwater General Permit (ISGP), part of the NPDES administered by Ecology. The site will have coverage under the ISGP and will proactively install stormwater treatment to meet permit requirements.

AGP Project

The AGP Project at T4B involves the construction of facilities to support a new commodity transload facility. These facilities will be integrated with the Port's planned infrastructure

improvements to maximize AGP's operational efficiency at T4B. The main components of the AGP Project include rail receiving facilities, a new shiploader, and a soybean meal storage structure (referred to as a surge silo). Installation of the shiploader will require additional improvements to the T4B dock. The AGP Project will also include utilities, lighting, and support structures such as a landside motor control center, dock side motor control center, and a bulk scale tower. Figure 6 of Attachment A depicts the proposed AGP Project.

The AGP Project includes a dual-track commodity transload facility to receive product via railcar and load this product directly to ship. The rail receiving building consists of two receiving tracks, each equipped with a receiving pit and dedicated conveyance for transfer to the ship. The two lead tracks into the building will hold up to 55 railcars. The rail receiving building will also include bypass tracks on the north and south sides to allow railcars to bypass the rail receiving building.

Railcars will arrive at the site and be positioned to index through the rail receiving building on each of the two receiving tracks. The railcars will be moved through the rail receiving building utilizing fixed railcar indexers, locomotives, or trackmobiles. As the cars are spotted over the receiving pit, the railcar gates are opened and the railcars are vibrated to induce flow from the railcars. Once the railcar is verified empty, the gates are closed and the string of railcars is moved forward. Once the string of cars is unloaded, the empty cars are moved to storage tracks in the Port's railyard. A new string of full cars will then be staged at the entrance of the rail receiving building and the process repeated. Operational scenarios are described in further detail in the *Project Description Technical Report* (Attachment C).

AGP will construct a surge silo on the north side of the rail receiving building that will provide up to 8,500 metric tons of soybean meal storage, allowing for operational flexibility with respect to the rail receiving and ship loading functions of the AGP Project. The surge silo will limit possible delays and provide an operational buffer. The surge silo will have an approximate diameter of 72 to 75 feet and a height of approximately 133 to 135 feet. Associated conveyance structures would add additional height estimated to be in the range of 170 to 190 feet above grade.

Independent and dedicated conveyor systems will reclaim product from each of the receiving pits. The conveyance will move and elevate the product to a scale tower, where the product will be weighed and sampled for quality testing. Additional conveyors will elevate and transfer the product to the shiploader.

The three-tower shiploader will be operated on the T4B berth, which will be upgraded as part of the Port's Proposed Project. The shiploader will be located at T4B and will include three loading spouts, each with a capacity of 2,000 metric tons (MT) per hour of dry bulk agricultural product. This will require reinforcement and modification of the existing dock structure.

Product is conveyed from each of the receiving pits by a series of dedicated drag conveyors, belt conveyors, and bucket elevators to the scale tower. The received product is weighed in an

enclosed bulk scale and sampled. Representative samples are tested and retained to demonstrate product quality. The balance of the product is transferred to the shiploader.

This increased capacity will result in an anticipated doubling of the annual throughput of soybean meal through the Port, with increases in rail and vessel traffic.

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 Port is located on the Pacific coast of Washington state in the cities of Hoquiam and Aberdeen in Grays Harbor County. The Port is located near where the Chehalis River enters Grays Harbor, approximately 15 miles east from the Pacific Ocean. The Pacific Ocean is accessed from the Port via the Grays Harbor deep-draft federal navigation channel within Grays Harbor.

The Project Area is located in Township 17N; Range 09W; and Sections 7, 8, 17, and 18. The coordinates (North American Datum of 1983 [NAD83]) of T4 are: 46.96083 N latitude/-123.83973 W longitude. The coordinates of the casting basin site are: 46.965956 N latitude/-123.833776 W longitude. A topographic map of the Project Area is included as Figure 7 of Attachment A.

Table 1 lists the Assessor's Parcel Number for each parcel that would be directly affected by the construction of the Proposed Project and a legal description for each parcel.

Table 1
Project Area Parcels

Assessor's Parcel Number	Legal Description
517090732001	HOQ AC PTN RR R/W IN SW 1/4 LY BET 28TH & 30TH STS
052209400001	HEERMANS ANNEX BLK 94 LS N 32.40 THIS INCLUDES BLK 65 & TAX A
056402300000	HOQ TDLDS TRS 23 & 24
029902000200	AB TIDELANDS LOTS 2-8 INC & VAC STS ADJ TR 20 LS TAX 1 & 7
317090834003	AB AC TAX 2
029902000102	AB TIDELANDS TAX A (OUT OF LOT 1) TR 20
317090834004	AB AC TAX 3
029902000103	AB TIDELANDS TAX B (OUT OF LOT 1) TR 20
317090834001	AB AC GOVT LOT 3 W OF DIVISION ST & S OF W HERON LS TAX 1, 2 & 3
029902000101	AB TIDELANDS LOT 1 LS TAX A; LS TAX B TR 20

In addition to the properties identified above, the Proposed Project would also affect the PSAP right of way in the vicinity of the rail crossings at South Monroe Street and South Washington Street in Aberdeen, Washington.

B. Environmental Elements

1. Earth Find help answering earth questions

a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

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

The On-Site Project Area is generally flat and, in some limited areas throughout, very gently sloping due to variations in natural topography. The levees and rock embankments surrounding the shoreline contain steep slopes. The steepest slopes on the site can be found on the inside and outside of the tide gate. These slopes are approximately 40%. However, the steepest slopes are only present in short distances and are confined to areas near the tide gate.

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.

As described in detail in the *Geologic Hazards Report* prepared for the Proposed Project (Attachment F), the soils underlying the On-Site Project Area have been identified as Quaternary deposits. These deposits are described as alluvium, which typically consists of sand and fine-grained soils such as silt and clay. Dense sand and gravel are also present within the alluvium at the Project Area. Underlying alluvium at the Project Area is sandstone bedrock. Artificial fill is also present in the Project Area and all upland portions of the Port, where fill was placed to develop the entire marine terminal complex. Artificial fill at the Project Area can consist of medium dense sand and gravel with variable silt content, debris, or wood waste.

The Project Area has no current or historic agricultural uses. There are no agricultural soils on site, and the Project Area is not considered to be agricultural land of long-term commercial significance.

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

Based on the findings of the *Geologic Hazards Report* (Attachment F), the risk of erosion and landslide hazards at the Project Area is minimal due to the flat topographic relief of the Project Area. However, based on the presence of unconsolidated alluvium and uncontrolled artificial fill, soils at the Project Area have a potential to result in differential settlement. Differential settlement is when one part of a structure settles more than another part of the structure.

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.

Grading, excavation, and filling would occur throughout the Project Area during construction of project elements. The total area of disturbance including from these activities would be up to 65.4 acres.

Grading

Grading would occur to accommodate the rail upgrades throughout the Project Area. Typical rail line construction involves the construction of a subgrade and subsequent grading, ditching, and installation of rail lines, subballast, and other rail infrastructure. The total area in which grading activities would occur is up to approximately 44.6 acres.

Excavation

Excavation would occur during construction of the AGP Project. Construction of the rail receiving building would require subgrade excavation and backfill. The Project construction would require the excavation of a total of up to approximately 53,180 cubic yards of material including excavations associated with the rail, utilities, and the railcar unloading facility.

Fill

The Project would require the installation of up to approximately 55,779 cubic yards of commercially sourced fill, ballast, and subballast at the site with up to approximately 2,594 cubic yards placed within wetlands to accommodate construction (including rail).

As described in Section A, the casting basin site would be filled. Filling the casting basin will require up to 290,000 cubic yards of material to return the basin to a flat topographic relief. It is anticipated that most of the material (over two-thirds of the total quantity) used to fill the casting basin will come from the existing stockpile located on site and that material will be used first (deeper in the fill). It is anticipated that the existing stockpile material will constitute approximately 200,000 cubic yards of the required fill material specified above. The remainder of the required fill material will be imported to the site by truck. The details of the origin of imported material and the destination of exported material would be determined prior to construction. The off-site import material, including structural fill, base course, and/or quarry spalls (up to 90,000 cubic yards), will be brought to the site with on-road trucks. Additional details about filling of the Casting Basin can be found in the *Project Description Technical Report* (Attachment C).

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

There is a potential for erosion to occur during construction of the Proposed Project. However, chances of erosion are minimal because the site is nearly fully paved and generally flat. Potential for erosion is low and would be mitigated for by implementing best management practices (BMPs) in accordance with state and local requirements and permit conditions.

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

The vast majority of the On-Site Project Area is currently developed and consists largely of impervious surfaces. After construction of the proposed project, the On-Site Project Area would remain largely impervious and negligible changes to impervious surfaces would be expected.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.
Appropriate erosion control measures will be employed during construction to minimize and manage erosion during construction of the Project and would include the following:

- Performing all work according to the requirements and conditions of the Project permits
- Developing a Temporary Erosion and Sediment Control (TESC) plan to minimize and manage erosion during construction of the Project
- Implementing standard BMPs such as silt fencing, straw wattles, erosion control blankets/netting, compost socks, or temporary surfacing with gravel or crushed rock in areas of exposed soils to control stormwater erosion
- Stabilizing disturbed soils using mulching, erosion control blankets/nets, temporary seeding, tackifiers, or similar measures
- Covering temporary stockpiles with erosion blankets or netting to reduce soil exposure to rainfall
- Surrounding temporary material stockpiles with silt fencing, straw wattles, filter berms, or other appropriate measures to reduce the potential for stormwater to carry sediments into surrounding areas
- Watering of exposed soils and temporary stockpiles if there is a potential for wind erosion to occur
- Using stabilized construction entrances for construction equipment to avoid tracking soils from construction sites onto adjacent paved areas and public streets

As indicated in the *Geologic Hazards Report* (Attachment F), the potential for differential settlement would be addressed through the design process by supporting larger structures on deep pile foundations and by designing smaller structures to be flexible to accommodate the anticipated settlement. By addressing the risks associated differential settlement through the structural design process, risks would be adequately managed.

Consideration of Cumulative Impacts

Cumulative projects in the region identified in Section A.8 of this checklist would be required to comply with federal, state, and local regulations, BMPs, required permit conditions, and mitigation (if necessary). It is expected that these measures would sufficiently address potential impacts related to geology and soils. And due to the low impacts of the Proposed Project, the potential cumulative impacts of the Proposed Action when combined with the other cumulative projects on earth and soils (e.g., erosion) are low.

2. Air Find help answering air questions

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

Construction and operation of the Proposed Project would result in emissions of criteria air pollutants, including particulate matter (PM, measured as PM_{10} and $PM_{2.5}$), carbon monoxide (CO), lead, sulfur

dioxide (SO_2), and oxides of nitrogen (measured as NO_X). It would also result in emissions of volatile organic compounds (also referred to as reactive organic gases [ROG]), and the greenhouse gas (GHG) emissions of carbon dioxide (CO_2) and methane (CH_4).

Information about construction and operation emissions associated with the proposed project from Section 6.5 of the *Air Quality and Greenhouse Gas Emissions Technical Study* (Attachment D) is summarized below. Refer to the *Air Quality and Greenhouse Gas Emissions Technical Study* for additional details about the air quality analysis. Air quality impacts were determined based on emission of individual criteria air pollutants (CAPs) relative to the Prevention of Significant Deterioration (PSD) thresholds.

Direct impacts are those that would occur as the result of and at the same time and place as the activities proposed by the Port and AGP. Direct impacts would only occur in the On-Site Project Area. Indirect impacts would occur later in time or farther in distance from the immediate project location but would be attributable to the Proposed Project. Indirect impacts also include those that would occur as the result of operating the Project, such as traffic to and from the Project Area.

Construction Emissions

Construction-related activities associated with the Proposed Project could result in direct and indirect impacts. Direct construction impacts could result from construction-related activities such as demolition, earthwork, grading, rail construction, removal and installation of piles, and construction of buildings and facilities. Indirect construction impacts could result from construction material delivery by barge and by truck and haul truck trips. Maximum annual construction emission estimates for the peak construction year are shown in Table 2.

Total CAP emissions were compared to PSD limits to assess significance of the air quality impacts for construction. The Proposed Project's construction GHG emissions of 9,685.6 carbon dioxide equivalent (CO_2e) would be less than the state GHG reporting threshold for industrial facilities of 10,000 MT CO_2e per year. The Proposed Project's construction CAP emissions would be below PSD thresholds.

Table 2
Maximum Annual Criteria Pollutant and Greenhouse Gas Emissions from Construction[1]

Project Element/Emission Source	Criteria Air Pollutant Emissions (lbs)						GHG Emissions (kg)		
	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$	CO	CO_2	CH_4	CO_2e
Rail Upgrades and Site Improvements	1,751.5	19,644.9	28.1	1,379.3	1,337.9	9,157.6	*4,489,090.1*	*46.5*	*4,490,253*
Dock, Fender, and Stormwater Upgrades	217.6	2,211.1	2.8	149.9	145.2	1,237.3	*311,306.7*	*7.4*	*311,492.1*
Cargo Yard Relocation and Expansion	712.7	21,363.4	25.4	507.3	492.0	2,628.0	*4,279,604.1*	*22.7*	*4,280,173*
AGP Project	1,210.4	12,760.6	13.9	895.8	868.6	6,474.2	*1,955,902.6*	*34.8*	*1,956,773*
Fugitive Dust	--	--	--	9,436.7	1,492.5	--	--	--	--
Mobile (worker commute)	71.1	336.0	5.7	6.1	5.4	6,839.3	*388,515.8*	*10.4*	*388,775.6*
Hauling (truck)	128.8	4,690.1	7.0	70.1	64.5	3,070.8	*937,576.9*	*123.4*	*940,661.3*

Project Element/Emission Source	Criteria Air Pollutant Emissions (lbs)						GHG Emissions (kg)		
	ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$	CO	CO_2	CH_4	CO_2e
Material Barge trips	26.1	310.8	0.2	17.9	15.9	91.3	*9,935.5*	*0.4*	*9,945.6*
Total (tons/*MT*)	2.1	30.7	<0.05	6.2	2.2	14.7	*12,371.9*	*0.2*	*12,378.1*
Year 1 Total[2] (tons/*MT*)	1.8	24.1	<0.05	1.3	1.3	12.7	*9,681.4*	*0.2*	*9,686.5*
Year 2 Total (tons/*MT*)	0.3	6.6	<0.05	0.2	0.2	2.0	2,690.5	*<0.05*	*2,691.6*
Maximum Annual Emissions (tons/*MT*)[3]	1.8	24.1	<0.05	1.3	1.3	12.7	*9,681.4*	*0.2*	*9,686.5*
PSD Thresholds (tons)[4]	40.0	40.0	40.0	15.0	10.0	100.0	--	--	--
Mandatory Washington State GHG Reporting Threshold (MT CO_2e per year)									*10,000*

Notes:

1. Based on the continuous 12-month period with highest proposed construction activity. Project- and element-specific emissions estimates reflect the combined total for both years of construction.
2. Year 1 represents the first 12 months of construction, beginning on April 1, 2024, per the Project Description Report. Year 2 represents construction expected to occur after March 31, 2025.
3. Maximum annual CAP emissions reported in tons and maximum annual GHG emissions reported in MT

Operations Emissions

Direct operational emissions would result from operation of the shiploader and maintenance equipment. Indirect operational emissions would result from employee commute vehicle trips, rail traffic related to the proposed project along the PSAP, and vessel operations in the federal navigation channel from the Port to 3 nautical miles into the Pacific Ocean.

Table 3 presents total emissions from the Proposed Project operations and related rail and vessel operations in the study area. The Proposed Project would produce small quantities of air pollutants from maintenance, operations, and emergency equipment.

Table 3
Maximum Annual Criteria Pollutant and Greenhouse Gas Emissions from Project Operations

Source		Criteria Air Pollutant Emissions (tpy)						GHG Emissions (MT/year)		
		ROG	NO_X	SO_2	PM_{10}	$PM_{2.5}$	CO	CO_2	CH_4	CO_2e
Mobile Sources	Rail	0.8	0.2	<0.05	0.6	0.6	8.5	2,582.1	<0.05	2,582.1
	Vessel	4.2	143.5	83.9	10.8	8.9	11.0	5,810.1	0.1	5,812.4
	Worker Vehicles and Crossing Delays	0.1	0.8	<0.05	<0.05	<0.05	7.7	1,027.3	<0.05	1,028.3
Ship Loader		--	--	--	1.4	0.2	--	--	--	--
Project Total		5.1	144.5	84.0	12.9	9.7	27.2	9,419.5	0.1	9,422.7
No Action (2025) Total		4.0	118.1	62.8	9.3	7.2	18.5	6,737.5	0.1	6,740.1
Net Annual Increase		1.1	26.3	21.1	3.6	2.5	8.7	2,681.9	<0.05	2,682.7
CAP PSD Thresholds (tpy)		40.0	40.0	40.0	40.0	40.0	100.0	--	--	--
Mandatory Washington State GHG Reporting Threshold (MT CO_2e/year)										10,000

Consideration of Cumulative Impacts

Air pollutants resulting from the Proposed Project are not anticipated to approach levels defined by the National Ambient Air Quality Standards (NAAQS). Although increased NO_X emissions during on site operations of the Proposed Project would not lead to exceedance of the NAAQS, the emissions were evaluated under a scenario where all cumulative projects identified in Section A.8 of this SEPA Checklist perform activities at the same time. The cumulative projects are not anticipated to result in meaningful increases in ongoing emissions from increased vessel, vehicle, or rail activity and potential impacts on air quality are likely to be limited to temporary construction emissions. Of the cumulative projects identified in the Project Area, none are anticipated to contribute significant annual CAP emissions, including NO_X. Therefore, cumulative impacts on air quality including the contribution of the Proposed Project is expected to be low.

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

No off-site emissions or odor sources would affect construction or operation of the Proposed Project.

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

As described in the *Project Description Technical Report* (Attachment C), the Proposed Project design includes measures, such as aspiration of soy meal product during ship loading, to reduce unnecessary emissions. Due to the low impacts to air quality from construction and operation of the Proposed Project, no additional mitigation is proposed.

3. Water Find help answering water questions

a. Surface Water: Find help answering surface water questions

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 southern portion of the Project Area is adjacent to Grays Harbor, which is downstream of the mouth of the Chehalis River. To the east of the Project Area is the Wishkah River and to the west of the Project Area is the Hoquiam River (see Figure 1 of Attachment A). The Hoquiam and Wishkah Rivers flow into Grays Harbor. The downstream portion of Fry Creek is also in the Project Area. That section of Fry Creek is directly connected to Grays Harbor and influenced by the tides that affect the harbor. It also receives flow from the upstream portions of Fry Creek via the Fry Creek Pump Station, which is located on the north side of PIR where it crosses the creek (see Figure 2 of Attachment A).

Streams and ditches that were delineated in the Project Area include: Fry Creek, East Terminal Way Ditch, and Ditches 1 through 7. Of those waterways, Fry Creek, East Terminal Way Ditch, and Ditch 4 are all directly connected to Grays Harbor and affected by the daily tides that occur in the harbor. Many of the remaining ditches are connected to one another and drain to one of the tidally influenced waters via shallow open channels or piping. The general characteristics of each of the streams and ditches identified in the Project Area are summarized in Table 4.

Table 4
Streams and Ditches Delineated Within the Project Area

Stream/Ditch Name	Jurisdiction	Flow Condition	Tributary to	Water Type[1,2]	Buffer Width (feet)[3,4]	Average Channel Width in Study Area (feet)	Approximate Length in Study Area (feet)
Fry Creek	Hoquiam	Perennial, Tidally Influenced	Grays Harbor	S	150	52	100
East Terminal Way Ditch	Aberdeen	Perennial, Tidally Influenced	Grays Harbor	S[2]	150	15	300
Ditch 1	Hoquiam	Intermittent	Ditch 4/ Grays Harbor	NA	NA	4	640
Ditch 2[5]	Aberdeen	Intermittent	Wetland 3/ East Terminal Way Ditch	NA	NA	1.5	400
Ditch 3	Aberdeen	Intermittent	Ditch 2/ Wetland 3/ East Terminal Way Ditch	NA	NA	3	700
Ditch 4	Hoquiam	Perennial, Tidally Influenced	Grays Harbor	S	150	25	1,250
Ditch 5[6]	Aberdeen	Intermittent	Ditch 6/ Ditch 7/ Ditch 2/ East Terminal Way Ditch	NA	NA	6	196
Ditch 6[7]	Aberdeen	Intermittent	Ditch 7/ Ditch 2/ East Terminal Way Ditch	NA	NA	6	475
Ditch 7[8]	Aberdeen	Intermittent	Ditch 2/ East Terminal Way Ditch	NA	NA	6	851

Notes:

1. Source: HMC 11.06 Definitions. Type S waters are all waters, within their bankfull width, as inventoried as "shorelines of the state."
2. Source: AMC 14.100.500(B)(6).
3. Source: HMC Table 11.05.330-1: Shoreline Buffers, for industrial and port development, non-water-oriented structures and uses.
4. Source: AMC.50.430.05 Table 4-1, for industrial and port development, non-water-oriented structures and uses.
5. Ditch 2 includes the areas initially mapped as Ditch 2 and Wetland 2 in the preliminary delineation report (HDR 2022).
6. Ditch 5 was previously mapped as Wetland 5 in the preliminary delineation report (HDR 2022).
7. Ditch 6 was previously mapped as Wetland 6 in the preliminary delineation report (HDR 2022).
8. Ditch 7 was previously mapped as Wetland 7 in the preliminary delineation report (HDR 2022).

Wetlands delineated in the Project Area include Wetlands 1, 3, 4, 8, and 9. General characteristics of those features are summarized in Table 5. The areas previously identified as Wetlands 2, 5, 6, and 7 during the initial delineation were later reclassified as ditches due to their excavated condition, presence of little to no in-channel vegetation, and lack of definitive hydric soil indicators. The areas that were

reclassified as ditches are channelized features situated between road and rail corridors that provide only stormwater conveyance functions. They lack substantial vegetative diversity or structural complexity and provide little to no hydrologic, habitat, or biogeochemical wetland functions.

Table 5
Wetlands Delineated Within the Project Area

Wetland Name[1]	Jurisdiction	Area (acres)	HGM Class[2]	Cowardin Classification[3]	Ecology and City Wetland Rating[4]	Required Buffer Width[5] (feet)
Wetland 1	Aberdeen	0.13	Depressional	EEM	II	150
Wetland 3	Aberdeen	0.02	Depressional	PEM/PAB	III	80
Wetland 4	Aberdeen	0.02	Depressional	PEM	III	80
Wetland 8	Aberdeen	0.06	Depressional	PEM	III	80
Wetland 9	Hoquiam	0.20	Depressional	PEM	III	80

Notes:

1. Wetland numbering is nonsequential because some areas identified as wetlands during HDR's delineation were later reclassified as ditches.
2. HGM classification is based on *A Hydrogeomorphic Classification for Wetlands* (Brinson 1993).
3. Cowardin classification is based on *Classification of Wetlands and Deepwater Habitats of the United States* (Cowardin et al. 1979; FGDC 2013). Definitions are as follows: EEM: Estuarine Emergent; PEM: Palustrine Emergent; PAB: Palustrine Aquatic Bed.
4. Washington State Rating System for Western Washington (Hruby 2014). Estuarine wetlands were rated based on special characteristics.
5. Wetland buffer width applied for high land use impact (AMC 14.50.914 – Appendix 2: Table A2-3; AMC 14.100.250; HMC 11.06.140).

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.

Construction activities would occur in, over, and adjacent to the described waters. Affected waterbodies include the following:

- Fry Creek would be affected by the installation of a new rail crossing. That crossing is proposed to be a new rail clear-span bridge that would be installed in place of the existing culvert. Removal of the existing culvert would require in-channel excavation to remove the existing fill that surrounds the culvert and any bedding material present underneath it. Construction of the new rail bridge at Fry Creek would require excavation and fill placement below the high tide line of the channel and possibly pile driving. Other over-water work (e.g., span construction) would also be required to complete the new rail crossing.
- East Terminal Way Ditch, Wetland 1, Wetland 4, and Ditch 2 would be affected by the installation of a new culverted rail crossing. Those waterbodies would all be filled to accommodate the new crossing and associated railbed.
- Wetland 9 would be partially filled to accommodate rail improvements proposed in the northwest portion of the Project Area.
- Ditch 5, Ditch 6, and Ditch 7 would all be filled to accommodate the rail improvements proposed in the eastern portion of the Project Area.

- Grays Harbor would be affected by the proposed dock fender upgrades described in Section A, which would require construction to occur in, over, and adjacent to the described waters. Both the removal of existing piles and the installation of new piles would occur.
- Grays Harbor would be affected by in- and over-water work to install the new AGP shiploader. For the new shiploader, in- and over-water work would include saw cutting holes in the existing pre-stressed concrete dock panels in the proposed foundation locations of the three new shiploader towers; removing exiting pre-stressed concrete dock support pilings from those locations; driving in a total of 12 new 36-inch-diameter steel pipe piles to support the new shiploader towers (four piles at each foundation location); and installing three 5-foot-thick by 32-foot-wide by 42.5-foot-long cast-in-place reinforced concrete pile caps. Two pairs of 36-inch-diameter steel pipe batter piles would also be added to the existing dock structure to replace the pre-stressed concrete support piles removed during shiploader construction.
- One conveyor system foundation would also be located within the existing dock structure. Construction of that foundation would require removal of existing gravel ballast and asphalt concrete paving, saw cutting the existing pre-stressed concrete dock panel, driving in four 36-inch-diameter steel pile piles, and installing a 20-foot-by-26-foot, 5-foot-thick cast-in-place reinforced concrete pile cap.

Refer to Section 6.4 of the *Water Resources Technical Study* (Attachment L) for more information about potential impacts to these waterbodies. Design plans and drawings are provided in Attachment 2 to this checklist.

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.

Approximately 2,594 cubic yards of fill material would need to be placed in approximately 0.37 acre of surface waters and 0.32 acre of wetlands to construct the proposed project. Surface waters that would be affected include Fry Creek, East Terminal Way Ditch, Ditch 2, Ditch 5, Ditch 6, and Ditch 7. Wetlands that would be affected include the southern portion of Wetland 1, and portions of Wetlands 4 and 9. Fill materials placed in those areas would include a mix of clean soil, gravel backfill, ballast, subballast, and rock. All fill materials would be sourced from local offsite suppliers.

Impacts to wetlands will generally be limited to placement of fill material to accommodate construction (including rail). It has been assuming that approximately 1 foot of stripping/grading will be required to remove organics within the footprint of wetlands that would be impacted by the Project. The Project construction will require approximately 329 cubic yards of material to be excavated from wetlands areas to remove organic material prior to placement of fill material.

Prior to fill placement, some excavation would need to occur in these surface waters to remove existing culverts and other materials (e.g., soil, gravel, rock) that may be unsuitable to support project construction, and to facilitate installation of new structures such as the rail span bridge across Fry Creek. Excavation and culvert removal at Fry Creek is anticipated to require up to 1,822 cubic yards of material to be removed from the waterbody.

4. **Will the proposal require surface water withdrawals or diversions? Give a 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.**

As shown in Figure 9 of the *Water Resources Technical Study* (Attachment L), portions of the Project Area are located within Zone AE of the Special Flood Hazard Area. As defined in the *Water Resources Technical Study*, the Special Flood Hazard Area is defined as having a 1% chance of being equaled or exceeded in any given year (also known as the 100-year flood).

6. **Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

The proposed project does not involve any discharges of waste materials to surface waters.

b. Ground Water: Find help answering ground water questions

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 a general description, purpose, and approximate quantities if known.**

Groundwater would not be withdrawn from a well for drinking water or other purposes. The Project will not involve the direct discharge of water to groundwater. Dewatering of accumulated groundwater will be needed for the construction of subsurface features, including the receiving building basement and associated conveyor tunnels. A dewatering plan will be developed for such areas by the construction contractor. Dewatering discharges will be routed to the Port's existing stormwater management system or to temporary stormwater treatment systems that would be sited in various locations on the Project Site as needed.

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

No waste material would be discharged as part of the proposed project.

c. Water Runoff (Including Stormwater):

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

The primary source of runoff that would affect the Project Area under both construction and operation would be from precipitation events. During construction, stormwater runoff would either flow to portions of the Port's existing stormwater management system or to temporary stormwater treatment

systems that would be sited in various locations on the Project Site as appropriate. The plans for those temporary systems are still under development and will be designed to comply with the requirements of the City of Aberdeen's Municipal Stormwater Permit and the Construction Stormwater General Permit. It is assumed that those temporary stormwater systems will discharge treated stormwater to the Chehalis River/Grays Harbors through the Port's existing outfalls.

During operations, stormwater runoff will flow to various treatment systems and outfalls depending on the location within the Project Area where the runoff occurs. Stormwater that falls on the existing and new rail corridors will be managed in accordance with the City of Aberdeen's Municipal Stormwater Permit and handled by existing municipal conveyance and treatment systems. Stormwater from T4 currently discharges to the Chehalis River via dock drains on T4 and catch basins in the adjacent upland area with corresponding outfalls. The Port proposes to install a stormwater treatment and conveyance system at the T4 dock and portions of the upland drainage area. That system will collect all of the stormwater from T4A and T4B, treat it, and discharge it through existing outfall(s) in the new cargo yard. An increase in the size of those outfall culverts may be required to handle the additional flow of the new system. If increasing culvert size is not sufficient to accommodate the increase in flow, then a new outfall would need to be added. The proposed stormwater system has been designed to provide stormwater runoff treatment meeting the pollutant benchmark values established under the ISGP, part of the NPDES administered by the Ecology. The site will have coverage under the ISGP and will proactively install stormwater treatment to meet permit requirements.

At the Cargo Yard Expansion area, where portions of the existing stormwater management system including the northern detention ponds, will be removed to accommodate expansion of the rail corridor in that location, new stormwater drainage infrastructure will be installed to convey water to West Ditch or to existing outfalls to the Chehalis River/Grays Harbor. Other portions of the Cargo Yard Expansion Area will use existing stormwater infrastructure, including existing infiltration facilities/stormwater management ponds on the south and east sides of the facility, to the maximum extent practical.

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

During construction, loose soils and other materials from construction sites, disturbed areas, and material stockpiles could be carried into surface waters by stormwater runoff. During operation, incidental spills and fugitive dust from commodity (e.g., soybean meal) handing operations that collect on equipment surfaces or pavement could also be carried into surface waters by runoff. During both construction and operation, incidental quantities of waste materials from leakage or accidental spills of fuel and other fluids from construction equipment, other vehicles, and trains could also enter surface waters directly or via stormwater runoff.

Due to the extensive amount of existing impervious paved surfaces in the Project Area, groundwater is not expected to be affected by incidental releases of waste materials carried by runoff.

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

The proposed project would result in minor changes to localized drainage patterns both on and in the vicinity of the On-Site Project Area. Stormwater collection and conveyance would be altered in areas where existing paved and/or graveled areas would be replaced with new rail lines and structures.

Those changes would primarily affect human-constructed drainage systems; no alteration of natural drainages are expected to occur. Stormwater runoff from the surface of the T4 dock would be routed into a new collection, conveyance, and treatment system. That drainage, and the drainage from other areas where the stormwater system is altered by the Project, would eventually be discharged to the Chehalis River and Grays Harbor following treatment.

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

BMPs will be implemented to avoid or minimize impacts on surface waters and wetlands from surface runoff water and drainage pattern alterations that will occur as a result of the Project. Construction and operation of the Project will be vested to the requirements of the *Stormwater Management Manual for Western Washington* (Ecology 2019), which identifies specific BMPs for construction and operational source control. Additionally, the Project will comply with the stormwater management requirements of the Cities of Aberdeen and Hoquiam.

In addition to the implementation of BMPs, the Project contractor will be responsible for the preparation of a SPCC Plan to be used for the duration of the construction period to safeguard against an unintentional release of fuel, lubricants, or hydraulic fluid from construction equipment. The contractor will also be responsible for preparing and implementing a TESC Plan.

Compliance with applicable regulations will require the implementation of certain measures. Potentially applicable regulations that pertain to water resources include the following:

- Clean Water Act Section 401 Water Quality Certification (Washington Administrative Code [WAC] 173.201A and 173.225)
- Washington State Water Pollution Control Law (Revised Code of Washington [RCW] 90.48)
- Ecology Code (WAC 17)
- Hoquiam Municipal Code (HMC) 8.14
- Aberdeen Municipal Code (AMC) 14.14

The Port and AGP propose to implement the following measures:

- Implementation of a Stormwater Management Plan, a Stormwater Pollution Prevention Plan, and a Water Quality Monitoring Program to be approved during the Clean Water Act Section 401 certification process
- Compliance with other provisions of a Clean Water Act Section 401 Water Quality Certification from Ecology and construction stormwater permits will be procured from Ecology, the City of Hoquiam, and the City of Aberdeen as appropriate for all phases of construction
- Compliance with Ecology's construction NPDES permit including measurement and mitigation measures intended to limit stormwater and in-water turbidity effects
- Mitigation of direct and indirect stormwater impacts during construction through implementation of TESC BMPs and compliance with Ecology NPDES construction permit provisions

- Implementation of a Mitigation Plan to account and compensate for any unavoidable impacts to wetlands, streams, or protective buffers caused by construction or operation of the Proposed Project

More specific mitigation actions would be developed during project permitting.

Consideration of Cumulative Impacts

Construction of the Proposed Project would have negligible to low potential to affect On-Site surface water hydrology; no Off-Site changes to surface water hydrology are proposed. None of the cumulative projects identified in Section A.8 of this SEPA Checklist would interact with the Proposed Project. Therefore, there would be no cumulatively significant impacts to surface water hydrology.

The Proposed Project would have low to medium impacts on water quality during construction and operations, mainly related to the potential for accidental spills and possible increased turbidity. Construction of the cumulative projects would also have the potential to affect water quality of streams, wetlands, and rivers within the study area. Similar to the Proposed Action, these projects would be required to obtain applicable water quality permits and to adhere to the required standards. In addition to resulting in adverse water quality impacts, some of the cumulative projects may improve water quality over the longer-term. These include the planned rail, highway, and other infrastructure improvements, which could also serve to reduce the frequency of rail and vehicular accidents and spills that could affect surface water, groundwater, and wetlands. The habitat restoration projects at Fry Creek and the Aberdeen-Hoquiam Flood Protection Project could improve surface water quality and reduce the frequency and duration of flooding. The Westport Marina Modernization Project could reduce water quality within Grays Harbor due to increased spills and leaks from projected increased number and size of vessels at the marina, but it could also be improved by modern stormwater and fueling systems and the removal of creosote-treated materials. Therefore, it is not anticipated that the Proposed Project would result in cumulatively significant impacts to water quality.

Potential cumulative impacts could also include direct impacts from excavation and fill of wetlands or other water resources within the same hydrological unit, which could contribute to loss of wetland functions and values on a watershed scale. However, the Proposed Project and other cumulative projects would be required to ensure no net loss of wetlands or other waters, including no net loss of the functions and values of those features. Therefore, the Proposed Project is not expected to result in cumulatively significant impacts to streams, ditches, or wetlands.

The Proposed Project would result in negligible to low impacts to floodplains, groundwater, and water use and water rights. The cumulative projects would be subject to many of the same regulations that are designed to limit impacts on those resources and, therefore, are likely to have similar impacts. The transportation and levee construction projects listed at the beginning of this SEPA Checklist could result in impacts on floodplains but would be required to minimize and/or compensate for such impacts. Both the rail and road transportation projects are likely to result in beneficial impacts to groundwater quality by improving the safety of those transportation corridors and reducing the potential for accidents where spills of fuel and other potentially hazardous substances could occur. Habitat improvement project are also likely to benefit groundwater quality by improving floodplain conditions and surface water quality.

None of the projects listed at the beginning of this SEPA Checklist are likely to involve permanent impacts to water rights or water uses.

4. Plants Find help answering plants questions

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**
- ☒ **water plants: water lily, eelgrass, milfoil, other**
- ☐ **other types of vegetation**

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

The majority of construction impacts would occur in previously developed areas and no undeveloped vegetated habitat areas would be converted for project use. The On-Site Project Area would experience disturbance from increased activity during construction. These disturbances would be short-term and temporary and would occur in previously developed areas and low-quality habitats that are highly disturbed under existing conditions. Some plant species may be removed or altered during excavation and trampled by construction equipment and vehicles. Based on wetland and waterway delineations in the Project Area, plant species are primarily common wetland and terrestrial species, including noxious weeds such as reed canarygrass (*Phalaris arundinacea*). No state priority, rare, or culturally important species are expected to be present in the construction areas.

Consideration of Cumulative Impacts

Construction of the Proposed Project would have low impacts on vegetation, mainly related to disturbances in previously developed areas and low-quality habitats that are highly disturbed under existing conditions. Construction of the cumulative projects identified in Section A.8 of this SEPA Checklist may have the potential to affect similar individual plants of the same species, but in other locations away from the On-Site Project Area. Therefore, the Proposed Project is not expected to result in cumulatively significant impacts to vegetation.

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

Table 6 summarizes the endangered threatened plant species that may potentially occur in Grays Harbor County, Thurston County, or Lewis County and therefore may be present on or near the On-Site Project area or Off-Site Project Area.

Table 6
Special Status Plant Species[1] Potentially Found Within the Study Area

Common Name	Scientific Name	State Status	Federal Status
Weak thistle	*Cirsium remotifolium* var. *remotifolium*	E	FS
Golden paintbrush	*Castilleja levisecta*	T	T
Kincaid's lupine	*Lupinus oreganus* var. *kincaidii*	E	T
Nelson's checkermallow	*Sidalcea nelsoniana*	E	T
Pale larkspur	*Delphinium leucophaeum*	E	
Thompson's fleabane	*Erigeron peregrinus* var. *thompsonii*	E	
Thin-leaved peavine	*Lathyrus holochlorus*	E	
Pacific peavine	*Lathyrus vestitus* var. *ochropetalus*	E	
Olympic fawn-lily	*Erythronium quinaultense*	T	FS
Water howellia	*Howellia aquatilis*	T	BS, FS (delisted)
True babystars	*Leptosiphon minimus*	T	
Salmon Jacob's-ladder	*Polemonium carneum*	T	BS, FS
Hairy-stemmed checkermallow	*Sidalcea hirtipes*	T	BS, FS
Frigid shooting-star	*Dodecatheon austrofrigidum*	E	
Fringed synthyris	*Veronica schizantha*	E	FS
Menzies' burnet	*Sanguisorba menziesii*	T	FS

Notes:
Source: WDNR 2021

1. 2021 Washington Vascular Plant Species of Special Concern presence in Project Area determined by its present in Grays Harbor County, Thurston County, or Lewis County

BS: Bureau of Land Management sensitive (all USFWS candidate and delisted species and Washington Natural Heritage Program species of concern ranked S1, S1S2, S2, S2S3, or S3 found on at least one Bureau of Land Management-managed area in Washington)
E: endangered
FS: U.S. Forest Service sensitive (all USFWS candidate and delisted species and Washington Natural Heritage Program species of concern ranked S1, S1S2, S2, S2S3, or S3 found on at least one U.S. Forest Service-managed area in Washington)
T: threatened

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

Final landscaping plans would be confirmed during project permitting.

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

Noxious weeds and invasive species known to be on or near the On-Site Project Area include reed canarygrass, bird's foot trefoil, and Himalayan blackberry. Eurasian watermilfoil (*Myriophyllum spicatum*), common cordgrass (*Sporobolus anglica*), and common reed (*Phragmites australis*) may also be present in Grays Harbor near the site.

5. Animals Find help answering animal questions

a. List any birds and other animals that 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:**
- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

The list below includes common wildlife species associated with terrestrial and wetland habitat types that may be found in the On-Site Project Area or Off-Site Project Area. As described in the *Biological Resources Technical Study* (Attachment E), the terrestrial component encompasses the geographic limits associated with direct ground disturbance, in-air noise, visual disturbances, truck traffic generated by project construction, and rail traffic related to Port operations. This area includes a 0.5-mile radius around the Project Area and offset along the PSAP short line railroad for rail traffic transiting to and from Project Area. The aquatic component includes the geographic extents associated with stormwater, in-water turbidity, in-air noise, underwater noise, visual disturbances, and vessel traffic generated by project construction and Port operations. This includes the furthest extent underwater noise is estimated to travel during construction and a 0.25-mile offset along the Grays Harbor federal navigation channel for vessels transiting to and from the Port property, through Grays Harbor, to the Pacific Ocean and up to 3 nautical miles offshore from the southern mouth of Grays Harbor.

- Mammals: Deer (*Odocoileus* spp.), elk (*Cervus canadensis*), black bear (*Ursus americanus*), cougar (*Puma concolor*), coyote (*Canis latrans*), Cascade red fox (*Vulpes vulpes cascadensis*), bats (Order: Chiroptera), Douglas squirrel (*Tamiasciurus douglasii*), raccoon (*Procyon lotor*), North American beaver (*Castor canadensis*), river otter (*Lontra canadensis*), skunk (Family: Mephitidae), shrews (*Sorex* spp.), moles (*Scapanus townsendii*), voles (*Microtus* spp.), and mice (Order: Rodentia)

- Birds: Various waterfowl (e.g., mallard [*Anas platyrhynchos*], geese [*Branta* spp.], mergansers [*Mergus* spp.], sandpipers (*Calidris* spp.), loons [*Gavia* spp.], dowitchers [*Limnodromus* spp.], gulls [*Larus* spp.]), bald eagle (*Haliaeetus leucocephalus*), Turkey vulture (*Cathartes aura*), owls (Order: Strigiformes), osprey (*Pandion haliaetus*), golden eagle (*Aquila chrysaetos*), red-tailed hawk (*Buteo jamaicensis*), Cooper's hawk (*Accipiter cooperii*), woodpecker (*Dryocopus* spp.), Red-breasted sapsucker (*Sphyrapicus ruber*), common raven (*Corvus corax*), northwest crow (*Corvus caurinus*), Steller's jay (*Cyanocitta stelleri*), American robin (*Turdus migratorius*), belted kingfisher (*Megaceryle alcyon*), northern flicker (*Colaptes auratus*), chickadees (*Poecile* spp.), sparrows (*Passer* spp.), nuthatches (*Sitta* spp.), juncos (*Junco* spp.), kinglets (*Regulus* spp.)

- Reptiles: Common garter snake (*Thamnophis sirtalis*), northwestern garter snake (*Thamnophis ordinoides*), western terrestrial garter snake (*Thamnophis elegans*), and northern alligator lizard (*Elgaria coerulea*) (Washington NatureMapping Program 2019)

- Invertebrates: Various arthropods, annelids, and mollusks

Common aquatic wildlife species associated with aquatic habitats that may be found in in the On-Site Project Area or Off-Site Project Area include but are not limited to the following:

- **Marine Mammals:** Humpback whale (*Megaptera novaeangliae*), gray whale (*Eschrichtius robustus*), orca (*Orcinus orca*), harbor porpoise (*Phocoena phocoena*), common dolphin (*Delphinus delphis*), California sea lion (*Zalophus californianus*), Steller sea lion (*Eumetopias jubatus*), harbor seal (*Phoca vitulina*)
- **Fish:** Spring-run and fall-run Chinook salmon (*Oncorhynchus tshawytscha*), coho salmon (*O. kisutch*), chum salmon (*O. keta*), steelhead and resident rainbow trout (*O. mykiss*), sea-run and resident coastal cutthroat trout (*O. clarkii clarkii*), mountain whitefish (*Prosopium williamsoni*), Pacific lamprey (*Entosphenus tridentatus*), river lamprey (*Lampetra ayresii*), western brook lamprey (*Lampetra richardsoni*), Olympic mudminnow (*Novumbra hubbsi*), largescale sucker (*Catostomus macrocheilus*), speckled dace (*Rhinichthys osculus*), longnose dace (*Rhinichthys cataractae*), redside shiner (*Richardsonius balteatus*), reticulate sculpin (*Cottus perplexus*), northern pikeminnow (*Ptychocheilus oregonensis*), peamouth chub (*Mylocheilus caurinus*), riffle sculpin (*Cottus gulosus*), prickly sculpin (*Cottus asper*), threespine stickleback (*Gasterosteus aculeatus*), and white sturgeon (*Acipenser transmontanus*). Ten non-native fish species have been confirmed to be present in the middle and lower Chehalis River, including a mix of catfish, herring, minnows, perch, bass, and sunfish (Hayes et al. 2019; Winkowski and Zimmerman 2019). Bass include largemouth bass (*Micropterus salmoides*) and smallmouth bass (*Micropterus dolomieu*).
- **Amphibians:** Western toad (*Bufo boreas*), northern red-legged frog (*Rana aurora*), Pacific treefrog (*Pseudacris regilla*), coastal tailed frog (*Ascaphus truei*), Dunn's salamander (*Plethodon dunni*), Van Dyke's salamander (*Plethodon vandykei*), giant salamander (*Dicamptodon tenebrosusis*)
- **Aquatic Invertebrates:** Dungeness crab (*Metacarcinus magister*), red rock crab (*Cancer productus*), the invasive European green crab (*Carcinus maenas*), shore crabs (*Hemigraphis* spp.), Pacific little neck clam (*Leukoma staminea*), butter clam (*Saxidomus gigantea*), cockles (Family: *Cardiidae*), blue mussels (*Mytilus edulis*), oysters (Order: Ostreoidea), western pearshell (*Margaritifera falcata*), floaters (*Anodonta* spp.), western ridged mussel (*Gonidea angulata*), and other various crustaceans, mollusks, bivalves, and macroinvertebrates

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

Nine species listed as threatened, endangered, or candidate species by the National Oceanic and Atmospheric Administration (NOAA) and USFWS may be found in areas that could experience

environmental effects as a result of the construction and operation of the Proposed Project, and three of those species also have designated or proposed critical habitat that includes the action area[1] (Table 7).

Table 7
Endangered Species Act-Listed Species and Critical Habitats That May Occur in the Action Area

Species and Scientific Name	ESU/DPS	Listing Status	Agency	Critical Habitat
Fish				
North American green sturgeon (*Acipenser medirostris*)	Southern DPS	Threatened	NOAA	Designated; includes action area
Bull trout (*Salvelinus confluentus*)	Coastal-Puget Sound DPS	Threatened	USFWS	Designated; includes action area
Chinook salmon (*Oncorhynchus tshawytscha*)	Lower Columbia River ESU	Threatened	NOAA	Designated; does not include action area
	Upper Columbia River ESU	Threatened	NOAA	Designated; does not include action area
Chum salmon (*Oncorhynchus keta*)	Columbia River ESU	Threatened	NOAA	Designated; does not include action area
Pacific eulachon (*Thaleichthys pacificus*)	Southern DPS	Threatened	NOAA	Designated; does not include action area
Marine Mammals				
Killer whale (*Orcinus orca)*	Southern Resident DPS	Endangered	NOAA	Designated; does not include action area
Birds				
Marbled murrelet (*Brachyrhampus marmoratus*)	NA	Threatened	USFWS	Designated; does not include action area
Streaked horned lark (*Eremophila alpestrisstrigata*)	NA	Threatened	USFWS	Designated; does not include action area
Western snowy plover (*Charadrius alexandrinus nivosus*)	Pacific Coast DPS	Threatened	USFWS	Designated; includes action area

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

The Pacific Flyway, as well as the Grays Harbor Estuary and National Wildlife Refuge and associated shorelines, mudflats, and aquatic beds that attract massive numbers of shorebirds and other bird species during migration are located in or near the On-Site Project Area or Off-Site Project Area. In late April through mid-May, large numbers of western sandpiper (*Calidris mauri*), dunlin (*Calidris alpina*), short-billed dowitchers (*Limnodromus griseus*), long-billed dowitchers (*Limnodromus scolopaceus*), and semipalmated plover (*Charadrius semipalmatus*), as well as black-bellied plover (*Pluvialis squatarola*), red knot (*Calidris canutus*), and least sandpiper (*Calidris minutilla*), stop to rest and forage on the extensive mudflats in Grays Harbor

[1] Under the Endangered Species Act, the "action area" is the defined geographic area to be directly or indirectly affected by the Proposed Project (50 *Code of Federal Regulations* [CFR] 402.02).

(USFWS 2023a). Some species, such as dunlin, mallards, American wigeon (*Mareca americana*), and northern pintail (*Anas acuta*), winter along the Washington coast, attracting predators such as peregrine falcon (*Falco peregrinus*), bald eagle, northern harrier (*Circus hudsonius*), and red-tailed hawk. Numerous passerines (e.g., songbirds) also use the estuary and refuge.

In addition, Audubon Pacific Flyway priority birds such as the bobolink (*Dolichonyx oryzivorus*), varied thrush (*Ixoreus naevius*), and Cassin's auklet (*Ptychoramphus aleuticus*) have been observed in Grays Harbor (Audubon 2022; eBird 2022).

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

Proposed measures to preserve and enhance wildlife include the following:

- Conduct biological and marine mammal monitoring during construction to reduce the chance of impacts to marine mammals, birds, and bats.
- Conduct pre-construction bird nest surveys to identify the presence of fledgling birds in the Project Area. If fledgling birds would be present during noise-intensive activities, evaluate feasible measures that could be implemented to reduce the chance of noise related impacts to fledgling birds.
- Conduct pre-construction bat surveys before tear-down or demolition activities in structures that bats may roost in to reduce the chance for impacts to special status bat species.
- Conduct Pacific sand lance egg surveys in sandy beach areas that are consistent with Washington Department of Fish and Wildlife grain size for spawning. If spawning Pacific sand lance are found, isolate the area in order to prevent impacts to this priority species.
- Conduct pre-construction fish surveys of Fry Creek and East Ditch to confirm if fish are present prior to construction in these areas.
- Install a fish guide net at upstream end of T4 work area to route fish around construction areas with the highest potential for noise impacts.
- Account and compensate for any unavoidable impacts to wetland or stream riparian habitat or protective buffers caused by construction or operation of the Project as described in the *Water Resources Technical Study* (Attachment L).

Consideration of Cumulative Impacts

Construction of the Proposed Project would have low habitat impacts, mainly related to short-term and temporary increases in noise and vibration. Construction of the cumulative projects identified in Section A.8 of this SEPA Checklist would also have the potential to temporarily increase noise and vibration. However, construction activities for the Proposed Project would be limited to the Port facilities and therefore is not expected to result in cumulatively significant impacts to habitat.

Construction of the Proposed Project also has the potential to result in low to medium impacts on wildlife species, including to special status habitat and species. This would mainly result from construction noise and increased activity affecting bird and bat species. However, construction activities for the Proposed Project would be limited to the Port facilities and temporary in duration, and therefore are not expected to result in cumulatively significant impacts to wildlife species. In addition, implementation of the mitigation presented in Section 7 would help to further reduce the potential impacts of the Proposed Project.

Operational impacts on biological resources from the Proposed Project would mainly be low, with medium impacts occurring mainly as the result of increased noise and vibration from vessel and rail traffic. The cumulative projects would improve transportation facilities and would not be expected to result in additional increases in traffic in the study area over the long term. Therefore, the Proposed Project would not contribute to cumulatively significant operational impacts to habitat.

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

The invasive European green crab (*Carcinus maenas*) may be present in Grays Harbor, which is adjacent to the Project Area.

6. Energy and Natural Resources Find help answering energy and natural resource questions

1. 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.

Construction of the proposed project would require electricity and fossil fuels (diesel and gasoline) in order to power construction equipment.

The proposed project would require electricity during operation. Electricity would provide power to the shiploaders, rail switches, the rail receiving building, operational lighting, and other support infrastructure. Locomotives onsite would use diesel fuel to move the railcars through the proposed receiving building.

Consideration of Cumulative Impacts

Due to the low demand for energy associated with the proposed project described above, it is not expected that impacts of the proposed project with respect to energy would contribute to a cumulative impact. Further, cumulative projects in the region would be required to comply with federal, state, and local regulations, best management practices, required permit conditions, and mitigation (if necessary). It is expected that these measures would sufficiently address potential impacts related to energy. Accordingly, the potential for cumulative impacts with respect to energy is low.

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

The Proposed Project will not affect the potential use of solar energy by adjacent properties.

3. **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.**

As discussed in the *Public Services and Utilities Technical Study* (Attachment I), negligible impacts to utilities would occur during construction and operation. Because the proposed project is not anticipated to result in impacts to utilities, no mitigation is proposed.

7. Environmental Health Find help with answering environmental health questions

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

The *Hazardous Materials Summary Report* (Attachment S) was completed for the proposed project. The Project would require excavation below the existing ground surface and could potentially encounter contaminated soils associated with the known cleanup sites discussed below.

The risk of exposure resulting from construction activities would be limited to routine handling and storage of hazardous materials for the purposes of construction (equipment related fuel, lube oil, hydraulic fluid, etc.). Minor releases of hazardous materials could occur during construction activities as the result of human error or minor equipment failure. It is anticipated that any releases would be small and easily contained within existing containment structures and/or with standard best management practices for spill response, containment, and clean up. Standard BMPs would be implemented to prevent release of hazardous materials into the environment (including but not limited to a contractor-developed SPCC Plan to be used for the duration of the Project).

During operation of the Proposed Project, the risk of exposure would primarily be related to routine handling and storage of hazardous materials for the purposes of Port operations (operational vehicle fuel, oil filters, used oil, solvents/cleaning agents, etc.). Minor releases of hazardous materials could occur during routine operations as the result of human error or minor equipment failure. It is anticipated that any releases would be small and easily contained within existing containment structures and/or with standard best management practices for spill response, containment, and clean up that are currently administered by on-terminal workers/employees. The Port and AGP would continue to comply with applicable regulations to implement safety and spill prevention and response protocols to reduce the release of hazardous materials.

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

The *Hazardous Materials Summary Report* (Attachment S) includes a review of available reports and data associated with the Project Area and adjacent properties to identify “potential sites of concern” that are defined as properties within or adjacent to the Project Area with conditions that have the potential to affect construction activities, affect worker safety, and/or the environment. These conditions can alter the potential characterization, handling and disposal

requirements, or potential site cleanup and monitoring requirements. Table 8 identified potential sites of concern that were identified during a database review for a 2022 Phase 1 Environmental Site Assessment conducted for the Proposed Project (HDR 2022). A map of these sites can be found in Figure 3 of the *Hazardous Materials Summary Report*.

Table 8
Potential Sites of Concern

Listed Business and Associated Address	Position Relative to the Project Site	Regulatory Database	Description
PIR Former Bulk Fuel Facility – 3115 Port Industrial Road	Adjacent to the north	WA CSCL	Awaiting cleanup. Impacts to soil include non-halogenated organics – non-halogenated solvents, benzene, diesel-range petroleum hydrocarbons, and gasoline-range petroleum hydrocarbons. Groundwater impacts include non-halogenated organics – non-halogenated solvents, metals, diesel- and gasoline range petroleum hydrocarbons.
Pettit Oil – 820 Myrtle Street	Adjacent – rail components to the north and south of this site	WA CSCL, VCP	Cleanup started. Contaminant types include nonhalogenated organics and unspecified petroleum products in soil and groundwater.
Port Property – Across From 820 Myrtle Street	Adjacent to the north	WA CSCL	Awaiting cleanup. This site has suspected unspecified petroleum contamination and confirmed unspecified petroleum surface water contamination according to Ecology's database.
Hoquiam Bulk Plant – 700 Myrtle Street	Adjacent 100 feet to the north	WA CSCL, HSL, WA SPILL	This site is not currently listed on the Department of Ecology website but does share an address with Pettit Oil – a site with database information as discussed below.
Pettit Oil – 640 700 720 Myrtle Street – 700 Myrtle Street	Adjacent to the north	WA CSCL, VCP	Cleanup started. This is an adjoining property with two sites that share the same address of 700 Myrtle Street. The Pettit Oil site is listed on the Department of Ecology website with documented soil and groundwater contamination above cleanup levels.
City Aberdeen Water Shop – 101 W Heron Street	Adjacent to the northeast	Ecology	Cleanup started. This site is a Leaking Underground Storage Tank (LUST) site. Documented contaminants in the soil include lead above the cleanup levels with benzene, other non-halogenated organics, petroleum-gasoline, and petroleum other contaminants being suspected. There is suspected petroleum-diesel and petroleum-other contaminates in the groundwater.
Former Grays Harbor Paper Mill Facility – 801 23rd Street	Adjacent to the west	Ecology	Several release sites in various stages of cleanup. According to the Current Environmental Conditions Report for this facility (dated March 20, 2017), Total petroleum hydrocarbons and total chromium exceeding the cleanup levels were detected in the groundwater in the wastewater treatment plant and basin area. Soil data was insufficient.

Listed Business and Associated Address	Position Relative to the Project Site	Regulatory Database	Description
SR 520 Pontoon Construction Site – 1301 W Heron Street	On site	Ecology	This property is included with the Project footprint and is listed as cleanup started. This site has documented non-halogenated organics – polycyclic aromatic hydrocarbons in soil above cleanup levels. The site has documented metals and petroleum products above cleanup levels in groundwater.

Notes:
Ecology: WA Department of Ecology's Toxics Cleanup Database
HSL: Hazardous Sites List: State Superfund Equivalent Sites
VCP: Voluntary Cleanup Program Sites
WA CSCL: Confirmed and Suspected Contaminated Sites List – State hazardous Waste Sites
WA SPILLS: Reported Spills, Spill has been reported to the spill prevention, preparedness and response division

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 documented and known existing potentially hazardous conditions, as described above and in the *Hazardous Materials Summary Report* (Attachment S).

As described in Section 16 of this SEPA Checklist and in the *Public Services and Utilities Technical Study* (Attachment I), there are natural gas transmission pipelines present in the Project Area. These have been surveyed and accounted for in the design of the Project and would not affect project development or design.

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.

Aside from equipment related fuel, lube oil, hydraulic fluid, etc., during construction and operational vehicle fuel, oil filters, used oil, solvents/cleaning agents, etc., during operation, no toxic or hazardous chemicals will be used, stored, or produced during the Project's construction and operation.

4. Describe special emergency services that might be required.

No special emergency services are expected to be required during project construction or operations.

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

Depending on the specific construction task, BMPs will be implemented as part of the Project to avoid or minimize environmental impacts related to hazardous materials. BMPs described in the Earth and Water sections (Sections 1 and 3) will be implemented to avoid or control environmental health hazards during construction, including the maintenance of construction equipment and the preparation and implementation of the SPCC Plan.

As discussed in the *Hazardous Materials Summary Report* (Attachment S), risk to the Proposed Project associated with encountering hazardous materials can be minimized by: 1) using special provisions, a hazardous materials management plan, or similar plan to account for uncertainties that may impact the Project schedule or budget; and/or 2) complete site soil and groundwater characterization in areas to be excavated at the Project Site prior to the Project start date.

The *Hazardous Materials Summary Report* (Attachment S) recommends the use of special provisions to account for potentially encountering hazardous materials at the Project Site. The Proposed Project's special provisions should address notification, handling, and disposal of hazardous materials if they are encountered at any point during project construction.

Proposed measures to reduce or avoid hazards include the implementation of a site-specific hazardous materials management plan to address potential contaminant exposure and characterization, handling, and disposal requirements in areas where known and suspected contamination has been identified. In areas where dewatering will occur, it is also recommended that that water be characterized for handling, disposal, or discharge purposes in areas where dewatering will occur.

Consideration of Cumulative Impacts

As described above and in the *Hazardous Materials Summary Report* (Attachment S), there are "potential sites of concern" that are within or adjacent to the Project Area with condition that have the potential to pose environmental health impacts. As shown in Figure 4 of the *Project Description Technical Report* (Attachment C), the only two cumulative projects that are nearby or within the Project Site are the PIR Pavement Preservation Project and the Fry Creek Restoration and Pump Station. These projects have the potential to encounter the same "potential sites of concerns." Construction of the PIR Pavement Preservation Project is expected to begin in 2024, so it is possible that construction activities associated with the PIR Pavement Preservation Project and the proposed project could overlap. It is anticipated that the Fry Creek Restoration and Pump Station project will be complete before construction of the proposed project begins.

Similar to the Port and AGP, all proponents of nearby cumulative projects would comply with applicable regulations to implement safety and spill prevention and response protocols to reduce the release of hazardous materials. Further, cumulative projects in the region would be required to comply with federal, state, and local regulations, best management practices, required permit conditions, and mitigation (if necessary). Therefore, while the potential for cumulative environmental health hazards impacts exists, it is expected that these measures would sufficiently address potential impacts related to environmental health. Accordingly, the potential for cumulative impacts with respect to environmental health is low.

b. Noise

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

Sources of noise in the area include rail and marine operations and vehicle traffic in and near the Port. The existing noise at the Project Area would not affect construction or operation of 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 Noise Impacts

Construction noise would result from the use of construction equipment and associated construction activities including demolition, casting basin earthwork, grading, building construction, paving, trackwork, and pile installation.

With the exception of construction of the AGP Project, construction would take place during daylight hours. For the AGP Project, construction would typically take place during daytime hours; however, construction activities may extend beyond daylight hours on occasion. Construction is planned in 10 work zones across the Port property. Almost all Hoquiam and Aberdeen residences are located more than 300 feet away from the nearest Work Zone. As described in detail in the *Noise and Vibration Technical Study* (Attachment H), noise levels from the planned construction activity in any work zone are not expected to exceed either the daily or monthly average Federal Transit Administration (FTA) criteria at most residences. However, at the edge of Work Zone 8, construction on rail upgrades would occur adjacent to five residences on Hood Street. These residences could experience daily levels at or above the FTA assessment criterion during certain construction activities as shown in Table 9.

Table 9
Potential Construction Noise Impacts at Hood Street Residences

Work Zone	Activity	Affected Receivers	Distance to Edge of Work Zone	Leq at Receiver
8	Building Construction	1321, 1325 Hood St. 1402, 1408, 1412 Hood St.	20 feet 60 feet	89 dBA 80 dBA
	Grading	1321, 1325 Hood St. 1402, 1408, 1412 Hood St.	20 feet 60 feet	95 dBA 86 dBA
	Paving	1321, 1325 Hood St. 1402, 1408, 1412 Hood St.	20 feet 60 feet	90 dBA 80 dBA
	Trackwork	1321, 1325 Hood St. 1402, 1408, 1412 Hood St.	20 feet 60 feet	94 dBA 85 dBA

Because construction noise is not subject to any WAC or local noise ordinance limits, and the noise exposure would be temporary, only occurring when new tracks were being constructed., this impact is considered to be low.

Operational Noise Impacts

As described in detail in the *Noise and Vibration Technical Study* (Attachment H), future noise levels were estimated based on the increased numbers of trains and ships and the new AGP shiploader system. The background noise level due to non-Port sources is assumed to remain similar to what it is today. The calculated future noise levels are shown in Table 10 along with the comparison to the existing noise levels. A discussion of the various aspects of the assessment follows.

Table 10
Projected Future Day-Night Sound Levels (Ldn) with Proposed Project

	Day-Night Sound Level (dBA Ldn)						
	2841 Bay Ave.	**208 Maple St.**	**2108 W 1st St.**	**1721 Martin St.**	**1402 Hood St.**	**1321/25 Hood St.**	**1017 State St.**
Future Background	56.4	56.4	56.4	56.4	56.4	56.4	56.4
Future Manifest Trains	42.9	52.4	52.7	53.8	53.8	59.8	50.1
Future Unit Trains	49.6	59.1	59.4	60.5	60.5	66.5	56.8
Future Train Horns	52.9	62.4	62.7	63.8	62.7	67.2	60.1
Future Ships	29.6	27.3	27.1	27.6	32.1	32.1	34.7
Future Cargo Yard	36.1	42.5	45.7	50.7	58.0	58.3	50.8
Future AGP	27.4	32.8	34.9	35.7	34.4	34.4	31.3
Future Total	**58.7**	**65.0**	**65.3**	**66.3**	**66.3**	**70.7**	**63.3**
Existing Total	58.0	63.4	63.7	64.7	65.3	69.7	62.0
Increase over Existing	**0.7**	**1.6**	**1.6**	**1.6**	**1.0**	**1.0**	**1.4**

The increase in noise exposure ranges from +0.7 decibel (dB) to 1.6 dB at the analyzed receptors. As such, the noise increase at all of the analyzed receivers meet the FTA criterion for no impact.

Along the PSAP in the Off-Site Project Area, an increase in Proposed Project-related train traffic above the baseline would result in increased noise at receptors near the PSAP. To address noise impacts along the PSAP that would result from the addition of Proposed Project-related trains, the Port of Grays Harbor, with assistance from PSAP, the owner and operator of the rail line, may engage public authorities within the Off-Site Project Area to support further analysis and identification of noise impacts and work with affected communities to inform interested parties of the process to implement Federal Railroad Administration (FRA) quiet zones.

Cumulative Noise Impacts Analysis

Although nearby sensitive receptors could experience construction noise exceeding FTA daily noise thresholds and because construction noise is not subject to any WAC or local noise ordinance limits, construction impacts would be temporary and limited in duration and are therefore considered to be low. If periods of construction were to overlap between nearby cumulative projects, the proposed project could contribute to a cumulative noise impact. As shown in Figure 4 of the *Project Description Technical Report* (Attachment C), the only two cumulative projects that are nearby or within the Project Site are the PIR Pavement Preservation Project and the Fry Creek Restoration and Pump Station. Construction of the PIR Pavement Preservation Project is expected to begin in 2024, so it is possible that construction activities associated with the PIR Pavement Preservation Project and the proposed project could overlap. It is anticipated that the Fry Creek Restoration and Pump Station project will be complete before construction of the proposed project begins.

Although the potential for overlap of construction activities and subsequent construction noise exists, all cumulative projects in the region would be required to comply with federal, state, and local regulations, best management practices, required permit conditions, and mitigation (if necessary). It is expected that

these measures would sufficiently address potential impacts related to noise.

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

As discussed in the *Noise and Vibration Technical Study* (Attachment H), noise and vibration impacts can be mitigated for as described below.

To address noise impacts along the PSAP that would result from the addition of Proposed Project-related trains, the Port of Grays and Harbor, with assistance from PSAP, may engage public authorities within the Off-Site Project Area to support further analysis and identification of noise impacts and work with affected communities to inform interested parties of the process to implement FRA quiet zones.

To mitigate for vibration impacts, a ballast mat can be installed under the rail closest to the Hood Street receptors to attenuate vibration.

8. Land and Shoreline Use Find help answering land and shoreline use questions

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.

Current land uses in the study area are primarily related to Port import and export activities. To the north of the Port, there are various commercial, industrial, and retail uses. Farther north, beyond these uses, are residential tracts. To the east, following the geography of the Chehalis River, there are residential, commercial, and retail uses. To the west, following the geography of the Chehalis River, there are various commercial and industrial uses.

The proposed project would not affect current Port land uses within the On Site Project Area or Off-Site Project Area. The Proposed Project would be consistent in nature with current on-site Port and industrial land uses. Additionally, the Port and AGP would be required to obtain the applicable land use approvals to build and operate the Project.

Surrounding residential and commercial land uses would not be changed or modified from project operations. More information about land use impacts can be found in the *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G).

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 because 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 Port has been in operation since 1911. There is no recent history of agricultural use on the site. Per the City of Hoquiam's Comprehensive Plan, there are no designated agricultural lands of long-term commercial significance (as defined in RCW 36.70A.030 and WAC 365-196-480) within the Project Area. Commercial forestry is classified under the City of Hoquiam's Natural Resources designation. As discussed under question e) below, the western portion of the Project Area is within the jurisdiction of the City of Hoquiam and is zoned by the City of Hoquiam as Industrial District.

Per the City of Aberdeen's Comprehensive Plan, there are no designated agricultural lands of long-term commercial significance within the Project Area. Per the City of Aberdeen's Comprehensive Plan,

agriculture may be allowed under the Open Space – Residential designation. The eastern portion of the study area in the City of Aberdeen is zoned as Industrial (I).

Therefore, there are no agricultural or forest lands of long-term commercial significance on or near the Project Site. The proposed project will not result in the conversion of farmland or forest land to a nonfarm or nonforest use.

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 proposed project would not affect or be affected by surrounding working farm or forest land business operations. The Project Area and the surrounding area are industrial and developed in nature. There are no surrounding agricultural lands.

c. Describe any structures on the site.

There are three industrial terminals within the On-Site Project Area. Terminal 1 contains liquid bulk storage structures, a pedestrian bridge, and ancillary support structures. Terminal 2 contains soybean meal storage structures, railroad infrastructure, and ancillary support structures. T4 contains three warehouses known as Transit Sheds 4-A, 4-B, and 4-C. Warehouse H is a Port-owned building on the western end of the Project Area near 28th Street. Also at the western end of the Project Area is a bridge crossing Fry Creek. A variety of other Port-owned buildings are located within the Project Area, mainly concentrated north of PIR.

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

A small portion of Warehouse H would be removed and retrofitted to provide clearance for construction of new rail. A pedestrian bridge and a pipe bridge at Terminal 1 would be disassembled and rebuilt to accommodate for the width of the additional rail line that would be added.

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

The western portion of the On-Site Project Area is within the jurisdiction of the City of Hoquiam. This area is zoned by the City of Hoquiam as Industrial District. The eastern portion of the study area in the City of Aberdeen is zoned as Industrial.

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

The portion of the Proposed Project under the jurisdiction of the City of Hoquiam has a Comprehensive Land Use Plan designation of “Industrial District.” The portion of the Project under the jurisdiction of City of Aberdeen has a Comprehensive Land Use Plan designation of “Industrial.”

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

The portions of the study area that are located within 200 feet of the ordinary high water mark have a shoreline environmental designation of “High Intensity” as designated within the Cities of Aberdeen and Hoquiam’s Shoreline Master Programs.

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

Both cities regulate development within ecologically sensitive and hazardous areas, referred to as critical areas, which are regulated through Critical Areas Ordinances (CAOs; HMC 11.06 and AMC 14.100). Construction would occur within wetlands, floodplains, fish and wildlife habitat conservation areas, and geologically hazardous areas that are regulated by the City of Aberdeen's CAO (AMC 14.100.400) and the City of Hoquiam's CAO (HMC 11.06.200). Construction would occur within wetlands, floodplains, fish and wildlife habitat conservation areas, and geologically hazardous areas that are regulated by the City of Aberdeen's CAO (AMC 14.100.400) and the City of Hoquiam's CAO (HMC 11.06.200). Where critical areas could be affected, appropriate mitigation that would comply with applicable federal, state, and local regulations would be implemented in compliance with the City of Aberdeen's Critical Areas Code and the City of Hoquiam CAO. A consistency analysis of the applicable critical areas regulations is provided in Attachment A of the *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G). Operational impacts to critical areas would occur within areas that are already highly disturbed under existing conditions. The proposed project would be consistent with the CAOs of Hoquiam and Aberdeen.

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

No people would reside in the area of the Proposed Project. It is anticipated that the Proposed Project could result in up to approximately 80 employees during operation, none of which would live on-site.

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

The Proposed Project would not displace any people.

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

No displacement would occur due to the Proposed Project. As such, no proposed measures to avoid or reduce displacement impacts have been proposed.

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

No measures are proposed because the Proposed Project would be compatible with the existing land uses and therefore no measures are needed to ensure land use compatibility.

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

No agricultural or forest lands of long-term commercial significance would be affected by the Proposed Project. As such, no proposed measures to reduce or control impacts to agricultural and forest lands have been proposed.

Consideration of Cumulative Impacts

The cumulative projects described at the beginning of this SEPA Checklist would result in continued land use development in the vicinity of the Proposed Project. However, these activities would all be required to obtain the necessary permits and approvals to ensure consistency with applicable land use plans.

Some short-term, indirect impacts to land use may be expected as the result of Proposed Project construction activities; however, as discussed above, the Proposed Project would also be consistent with applicable land use plans and policies and is not anticipated to result in substantial indirect land use impacts. As a result, the Proposed Project is not anticipated to contribute to notable cumulative land use impacts and the Proposed Project's cumulative impact would be low.

9. Housing Find help answering housing questions

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

No housing units would be provided as part of the Proposed Project.

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

No housing units would be eliminated as part of the Proposed Project. There are no residential uses within the Project Area.

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

Due to the industrial nature of the Project Area and the proposed project, there would be no impacts to housing. No measures are proposed to reduce or control housing impacts.

Consideration of Cumulative Impacts

The proposed project would not result in impacts to housing. As a result, the Proposed Project is not anticipated to contribute to notable cumulative housing impacts and the Proposed Project would have no cumulative impact with respect to housing.

10. Aesthetics Find help answering aesthetics questions

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

The exact height of the tallest proposed structure, the surge silo, would be up to 190 feet above grade. More information can be found in the *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G).

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

Construction Impacts

The presence of construction equipment (e.g., backhoes, tractors, cranes, and trucks) and the related increase in activities would create short-term visual changes at the Project Area. Project construction may also be visible from residences and businesses to the north of the Port, as well as passing motorists and recreationalists. Close views (i.e., within 1.5 miles) of construction by the public would be limited for motorists traveling along PIR and State Route 105, and even more limited for residents to the north. Much of the construction activity would not be visible from these locations. Scenic views from State Route 105 and U.S. Route 101

would not be affected by the Proposed Project because of the limited views of the Project Area from these locations.

Operational Impacts

Operation of the proposed project would be similar to existing conditions at the Port. Operational activities, including use of the new shiploader, may be visible to viewers. Visual changes resulting from operation of the Proposed Project are not anticipated to result in substantial visual impacts on views of the Port or harbor that would negatively affect any viewer groups.

Consideration of Cumulative Impacts

As described in Section 5.5 of the *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G), visual resources in the study area are dominated by industrial operations and infrastructure at the Port. The cumulative projects at the beginning of this SEPA Checklist would be consistent with industrial uses in the vicinity and would not cumulatively impact the viewshed. Two projects, The Fry Creek Restoration and Pump Station and the U.S. Route 101 Fry Creek Culvert Replacement, would occur directly within the study area for Land Use and Visual Resources. The Fry Creek Restoration and Pump Station would restore Fry Creek to a more natural state and thus would have a beneficial visual impact on viewers in the study area. The U.S. Route 101 Fry Creek Culvert Replacement involves the replacement of two existing culverts in Fry Creek with a reinforced concrete arch bridge. The new concrete arch bridge would be consistent with the visual character and quality of the study area. Other future projects are located far enough away that they would not impact views in the study area. The contribution of the Proposed Project to cumulative impacts on visual resources is anticipated to be low.

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

As described in the *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G), no measures to reduce aesthetics impacts are proposed because the Proposed Project would be expected to result in low impacts on visual resources.

11. Light and Glare Find help answering light and glare questions

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

Construction would primarily take place during daylight hours (between 7:30 a.m. and 4:30 p.m.). If nighttime construction would be necessary, a minimal amount of lighting would be needed for safety purposes. Lighting would be directed onto the Project Area. For proposed operations, new lighting would be installed around the proposed shiploader to provide safe conditions for ship crews, longshoremen, and supporting staff.

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

The changes in lighting toward the interior of the Port and away from residential areas are not anticipated to affect views from scenic routes. Increased light at the shiploader could affect views from within and across the harbor. This new lighting would result in minor increases in light and glare compared to existing conditions and would be installed to minimize impacts on off-site receptors (e.g., water and residential uses). It is not expected that the minor increases in light or glare would result in a safety hazard.

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

The proposed project is not sensitive to light or glare and would not be affected by existing off-site sources of light or glare.

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

As described in the *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G), construction lighting would be directed onto the Project Site and would not negatively affect day or nighttime views. Glare would not be increased during construction. Although nighttime operational lighting and glare would increase, new sources of nighttime lighting and glare are not expected to affect any viewer groups negatively. No mitigation for aesthetics impacts, including light and glare, is proposed because the Proposed Project would be expected to result in low impacts on visual resources.

Consideration of Cumulative Impacts

Due to the low impacts associated with the proposed project described above, it is not expected that impacts of the proposed project with respect to light and glare would contribute to a cumulative impact. Accordingly, the potential for cumulative impacts with respect to light and glare is low.

12. Recreation Find help answering recreation questions

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

The Chehalis River and Grays Harbor are used by recreational fishers and boaters. The Port maintains public access for aquatic recreationalists within Grays Harbor at the 28th Street Boat Launch and observation tower located 0.25 mile northwest of the Terminal 1 dock. The boat launch includes a fishing pier and provides boaters and anglers free public access to Grays Harbor and the Chehalis River.

Less than 0.25 mile north of the Project Area is a 3.5-acre neighborhood park called West End Park that includes an open playfield with basketball courts and a softball diamond. Olympic Stadium, a historic sports venue, is the closest recreational facility located approximately 0.40 mile north. The Chehalis Riverfront Walkway is a 3-mile trail located to the south of the study area on the opposite side of the Chehalis River.

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

The proposed project would not result in the conversion of any recreational land or use into non-recreational uses, nor would it result in any permanent displacement of recreational uses.

Construction Impacts

In-water work as part of the proposed project could cause short-term localized noise impacts. Additionally, in-water work would require the use of vessels. These vessels could temporarily disrupt recreational boating in the vicinity of the Port. Recreational users who are deterred by construction noise and vessel traffic would have access to other areas for boating and fishing throughout Grays Harbor during the short duration of in-water work.

Operational Impacts

As described in the *Project Description Technical Report* (Attachment C), operation of the proposed project would be anticipated to add approximately 60 vessel round trips to the Port per year. Increased vessel traffic in Grays Harbor could affect recreational boaters and fishers using the federal navigation channel; however, this increased traffic would be spread out over the course of the year. Recreational users are accustomed to vessel traffic within the federal navigation channel given the industrial nature of operations at the Port, and they have access to fishing and boating areas throughout Grays Harbor. More details about construction and operation impacts can be found in the *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G).

Consideration of Cumulative Impacts

The cumulative projects described at the beginning of this SEPA Checklist may have short-term indirect impacts on recreational users as a result of construction activities. Any construction impacts, such as increased noise or traffic, would be temporary and localized to the area of construction. Given the ongoing industrial activities occurring in the study area, construction of the Proposed Project is not anticipated to contribute to notable cumulative impacts on recreational resources and the cumulative impact on recreational users would be low.

The Westport Marina Modernization Project is located approximately 12.5 miles to the southwest of the Port. The marina currently serves boaters and fishers who use Grays Harbor. According to the Port of Grays Harbor Westport Marina Demand Analysis (as cited in the *Land Use, Recreation, and Visual Resources Technical Study* [Attachment G]), the marina's moorage spaces are not fully utilized, factoring in both permanent moorage tenants and transient boaters. The proposed improvements include reconfigurations to decrease the number of slips, so the proposed improvements are not projected to increase the number of recreational boats or other vessels. The contribution from operation of the Project to cumulative impacts on recreational resources is anticipated to be low.

None of the other cumulative projects described at the beginning of this SEPA Checklist are anticipated to result in increased vessel traffic within the study area. As described the *Land Use, Recreation, and Visual Resources Technical Study* (Attachment G), operation of the Proposed Project is expected to result

in an increase in vessel traffic to and from the Port, but the impact on recreational boaters and fishers is anticipated to be low.

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

As discussed in the *Vessel Traffic Technical Study* (Attachment K), proposed mitigation associated with vessel traffic would help to reduce the already-low impacts to recreationists. The following mitigation measure would minimize impacts from the vessel traffic associated with the proposed facility:

- The Port, already familiar with requirements due to their operations at Terminal 2, shall work with the Grays Harbor Safety Committee, including the U.S. Coast Guard, the Port, and tribal contacts to establish procedures to announce project-related vessel traffic arrivals and departures over a designated Very High Frequency marine radio channel at least 1 hour before arriving and departing, which will minimize the potential for vessel collisions and interference with tribal and recreational fishing.

13. Historic and Cultural Preservation Find help answering historic and cultural preservation questions

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

There are no buildings, structures, or sites in the Project Area that are eligible for listing in the national, state, or local preservation registers. The T4 dock was evaluated to determine its eligibility for listing in the National Register of Historic Places (NHRP). Under NRHP eligibility criterion, the property is not recommended for listing in the NRHP. Supporting documentation and analysis can be found in the *Cultural Resources Technical Report* (Attachment M).

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 proposed project was reviewed by a qualified professional archaeologist. Sources consulted included the Department of Archaeology and Historic Preservation's WISAARD database, historical maps and photographs, and historical and archaeological literature. The results of the cultural resources investigation were documented in the *Cultural Resources Technical Report* (Attachment M).

There is one recorded archaeological site within the Project Area. The site is partially located within the footprint of the casting basin. Deposits related to the archaeological site, including structure foundations, piling, wood waste, and domestic refuse, were identified under modern fill. Deposits were radiocarbon dated to between 800 and 2,100 years ago. Monitoring during initial construction of the casting basin occurred but did not result in identification of significant deposits or additional precontact items. The potential historical archaeological materials are generally limited to the area around the archaeological site. Although no historically significant

deposits have been identified in site investigations to date, there could be such deposits present. The site remains ineligible for the NHRP. Three other archaeological sites were recorded within 1 mile of the Project Area.

Five cultural resources studies have been conducted in the On-Site Project Area in the past. Three of these studies included subsurface testing in or very near the On-Site Project Area. The other two are related to the construction of the casting basin. These studies are referenced in Section 4.3.3 of the *Cultural Resources Technical Report* (Attachment M).

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.

The potential for the proposed project to result in impacts to cultural and historic resources was evaluated pursuant to Section 106 of the National Historic Preservation Act (NHPA). Under Section 106 of the NHPA, adverse effects occur when "when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" (36 CFR 800.5[a][1]). Effects to archaeological sites were assessed by comparing the extent of potential direct and indirect impacts to the extent of recorded resources and areas of elevated archaeological probability. Direct effects to historic structures occur when NRHP-eligible structures are demolished or modified; changes occur to the structure's historic use, setting, or landscape; or the structure is damaged by noise or vibration. Indirect effects to historic structures occur when changes to access or circulation, or the introduction of noise or visual obstructions, reduce the use of a property or cause it to fall into disrepair. Consultation with appropriate tribal parties is occurring under Section 106 of the NHPA.

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.

No mitigation has been proposed for cultural resources because the proposed project is not expected to result in adverse effects to cultural resources. The Washington Department of Archaeology and Historic Preservation and tribes were consulted with about the Proposed Project and were notified that there were no adverse effects expected. The Washington Department of Archaeology and Historic Preservation and some tribes continued consultation and concurred with this finding.

Consideration of Cumulative Impacts

Past actions in the Project Area have resulted in disturbances to the site, including the placement of fill and the construction of structures. These actions have not resulted in any impacts to known cultural resources, although changes to the landscape have altered the historic context over the years. Reasonably foreseeable future actions in the Project Area have the potential to impact cultural resources. However, the Proposed Project is not anticipated to result in adverse effects, and future potential impacts would be discussed on a project-by-

project basis through consultation with the State Historic Preservation Officer and Native American tribes as required under Section 106 of the NHPA or state or local laws. This process would help to minimize and address potential adverse effects. Therefore, the Proposed Project, in combination with reasonably foreseeable future actions, would have a low potential to contribute to cumulatively substantial impacts on cultural resources.

14. Transportation Find help with answering transportation questions

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.

Local road access to the Project Area is provided via PIR. Further access to the Project Area is provided by West Heron Street, East Terminal Road, and West Terminal Way. Both East Terminal Road and West Terminal Way intersect with PIR. Regional highway connections include U.S. 12 and U.S. 101. West Heron Street directly connects to U.S. 101 and is classified as a truck route per AMC 10.60.

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?

There are no public transit stops within the Project Area. However, Grays Harbor Transit provides public transit to the area surrounding the Project Area. A transit stop for Grays Harbor Transit Route 20, a public passenger bus, is located approximately 800 feet north of the northern boundary of the Project Area.

c. 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).

An internal, private access road will be built starting at the point where the public portion of West Heron Street terminates. This access road will extend beyond the existing and proposed tracks intersection with West Heron Street and will lead into the expanded T4A site. This access road will roughly parallel the proposed rail tracks through the expanded T4A site. Upon construction of the rail upgrades, East Terminal Road will be shortened to end at the storage tracks at East Terminal Road.

Vehicle access between T4A and T4B will be maintained, with potential pavement upgrades, and will not be impeded by the rail line. Redundant internal circulation routes will provide multiple routes of ingress and egress at T4. Routes will lead to either the existing T2 security checkpoint or a new T4 security checkpoint located on the east side of the Project Area at West Heron Street.

Port entry access points on the eastern border of the site will be relocated and secured. Changes to access points and security measures related to site access will be implemented in accordance with Department of Homeland Security requirements and will be documented in the Homeland Security Port Security Plan.

d. 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 would occur in the immediate vicinity of water, rail, and air transportation. The Project Area is adjacent to Grays Harbor, which contains the Grays Harbor deep-draft federal navigation channel. The PSAP short line railroad enters the Project Area, where it provides connection to Port-owned private rail lines within the Project Area. The Project Area is located approximately 3.5 miles west of the Project Area.

Operation of the proposed project would result in an increase in rail and vessel trips. No project-related air transportation would be required or anticipated. As discussed in the *Rail Traffic and Safety Technical Study* (Attachment T), the Project is expected to increase the bulk transport of soy product and will be transported to the Project Area by trains. As discussed in the *Vessel Traffic Technical Study* (Attachment K), the Proposed Project would result in additional export vessels arriving at and departing the Port.

e. 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?

As discussed in the *Vehicle Traffic and Safety Technical Study* (Attachment J), construction of the casting basin element of the proposed project would result in up to 3,500 total truck trips to import fill material over the course of 5 to 6 months. During construction, the AGP element of the Proposed Project is estimated to require 50 trips for individual workers and 15 trips for material deliveries per day. Operation of the completed project would result in limited vehicle trips as a result of employees commuting to the Project Area. Estimates for construction and operational vehicle traffic was determined by the Project proponents and their design teams.

f. 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.

As the Port's main general cargo terminal, T4 is primarily used to move forest and roll-on/roll-off (RORO) products, including logs. Logs arrive to the Port by truck and are shipped out. With the completion of the Proposed Project, the Port will continue to have marine terminal and cargo yard area suitable for log handling and storage for the movement of forest products. As such, the proposed Project would not affect the movement of agricultural and forest products on roads or streets in the area.

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

Although the Proposed Project impacts on transportation would be low), the following mitigation from Section 8 of the *Vehicle Traffic and Safety Technical Study* (Attachment J) could further improve vehicle safety along the PSAP rail line:

- To reduce the potential for increased delay of emergency vehicles at PSAP grade crossings during project operations, PSAP should work with local emergency service providers to provide advance notification of incoming trains.
- To address the potential for emergency access conflicts to areas along the PSAP rail line during unplanned unit train stoppages, PSAP should work with local emergency service providers along the PSAP rail line to develop and implement a notification protocol to inform local emergency service providers and other interested parties of the duration and magnitude of the unplanned stoppages.
- To reduce the risk of collisions on the PSAP rail line, PSAP should work with local jurisdictions including the Washington Department of Transportation and the Washington Utilities Transportation Commission to ensure all of the public grade crossings meet Manual on Uniform Traffic Control Devices (23 *United States Code* 109(d)) guidance to include a yield or stop sign on every cross-buck post.
- To reduce the risk of collisions at grade crossings, PSAP should install flashers, gates, and/or cantilever active-warning devices at crossings when agreed upon by the railroad and jurisdictional authorities to improve vehicle, pedestrian, bicycle, and rail safety conditions.
- To reduce the risk of collisions at grade crossings, PSAP should coordinate with applicable jurisdictions to ensure that trees, brush, and weeds are cleared from all grade crossings as far as possible to ensure clear lines of sight for all vehicle drivers approaching rail crossings.

The following mitigation measures are included in the *Vessel Traffic Technical Study* (Attachment K):

- The Port, already familiar with requirements due to their operations at T2, shall work with the Grays Harbor Safety Committee, including the U.S. Coast Guard, the Port, and tribal contacts to establish procedures to announce project-related vessel traffic arrivals and departures over a designated Very High Frequency marine radio channel at least 1 hour before arriving and departing, which will minimize the potential for vessel collisions and interference with tribal and recreational fishing.

Consideration of Cumulative Impacts

Vehicle Traffic

None of the cumulative projects identified are anticipated to have the potential to contribute to cumulative impacts on vehicle traffic or safety. Some of the cumulative projects identified include features designed to reduce grade crossing delays, such as the Aberdeen U.S. 12 Highway-Rail Separation Project mentioned in this SEPA Checklist. The rest of the cumulative projects either do not affect the public roadway system or involve rehabilitation of existing facilities.

Rail Traffic

The City of Aberdeen, in collaboration with the Port, Grays Harbor County, and with the support of the Washington Department of Transportation, is advancing the Aberdeen U.S. 12 Highway-Rail Separation Project through final design and right of way acquisition. This project is fully funded through the construction phase. The U.S. 12 Highway-Rail Separation Project will provide beneficial impacts to rail traffic and safety by creating a separated road-rail crossing.

Four projects are planned as part of PSAP Railroad Annual Maintenance and Improvements that will add tracks to increase capacity in specific segments of the railroad, mitigate crossing blockages, and improve efficiency of rail movements. The projects planned by PSAP will provide beneficial impacts to rail traffic and safety by increasing capacity and efficiency of train movements on the railroad and reducing crossing blockages.

Vessel Traffic

When combined with existing vessel traffic and considering the Westport Marina Modernization Project, overall ship traffic is anticipated to be associated primarily with the increased vessel activity from the Proposed Project. As described in Section 6.5 of the Vessel Traffic Technical Study (Attachment K), cumulative impacts from the Proposed Project and the Westport Marina project is anticipated to be low.

15. Public Services Find help answering public service questions

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.

Construction Impacts

As discussed in the *Public Services and Utilities Technical Study* (Attachment I), demand for some public services could increase because of the proposed project. Construction of the proposed project could result in a minor increase in demand for fire protection and emergency services, as site preparation and construction could result in increased risk to construction workers. However, the increase in demand would be minor and temporary, and would not exceed the capacity of the local file and emergency services infrastructure. Construction of the proposed project could also temporarily increase solid waste and hazardous waste for collection and disposal. However, these services would not exceed the utility service provider capability.

Operational Impacts

During operation of the proposed project, there would be negligible impacts to police services, fire protection and emergency medical services, and solid waste disposal services. During operation of the proposed project, additional train traffic could result in affected emergency response times. Additional train traffic at at-grade crossings could result in delays of police, fire, or emergency vehicles. Response times could be affected if a dispatched emergency vehicle would need to cross an at-grade crossing containing a stopped train. Alternative routes may be taken. Routine operation of the Proposed Project would increase the amount of solid waste

generated at the Project Site to a limited degree and could generate hazardous waste used in terminal and rail operations. More information about these negligible impacts can be found in the *Public Services and Utilities Technical Study* (Attachment I).

Consideration of Cumulative Impacts

Construction and operation of the Proposed Project would result in small increases in demand for police, fire protection, and emergency medical services, as well as for water supply, wastewater conveyance and treatment, solid waste collection and disposal, stormwater conveyance, electricity, natural gas, and telecommunications utility services in their respective service areas.

Similarly, construction and operation of the cumulative projects would also create demand for such public services and utilities. It is expected that the cumulative projects in the area would use the same public services and utility systems as those described for the Proposed Project in Section 5 of this report.

As noted in the *Public Services and Utilities Technical Study* (Attachment I), the Aberdeen wastewater system is projected to be able to meet anticipated demand to at least 2038, so it would have sufficient capacity to treat additional cumulative wastewater flows. Similarly, the water supply and electrical energy supply systems are projected to be able to meet anticipated demand to at least 2040, and the solid waste disposal facilities can meet anticipated demand to 2085; they, too, would have sufficient capacity to meet both Proposed Project and cumulative project demand for these utilities. Increases in the capacity to provide police, fire protection, and emergency medical services would be expected to keep pace with demand, in accordance with applicable comprehensive plans.

Like the Proposed Project, the cumulative projects would be required to obtain the applicable wastewater discharge permits, utility service permits, and public service approvals to remain in compliance with requirements, such as NPDES permits. Such approvals would not be issued if the public services and utility systems did not have the capacity to serve the Projects.

The Proposed Project, in combination with reasonably foreseeable future actions, would be consistent with current land use planning and would not contribute substantially to cumulative impacts on public services and utilities. Cumulative impacts related to increased demand for utilities and public services would be negligible, because Proposed Project impacts would be low or negligible and existing public services and utilities are expected to be able to accommodate any increased demand.

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

Although the impacts of the Proposed Project on public services would be low, the following proposed mitigation measures would reduce potential impacts:

- The Proposed Project proponents shall prepare and implement a Construction Traffic Control Plan as part of the Proposed Project, including construction phasing that would be sequenced in a manner that gives special consideration to vehicular traffic and access to all construction work zones. Emergency access for police services, fire protection, and emergency vehicle services shall be maintained during construction so that emergency response times would not substantially increase over current levels.

- The Proposed Project proponents shall also coordinate with solid waste collection providers regarding potential for temporary disruptions to solid waste services during construction to avoid or minimize adverse impacts.

16. Utilities Find help answering utilities questions

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

Information about existing utilities within the Project Area can be found in the *Public Services and Utilities Technical Study* (Attachment I).

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

No specific or new utilities are proposed as part of the proposed project. As discussed in the *Public Services and Utilities Technical Study* (Attachment I), utility infrastructure is present within the Project Area and could be affected during construction of the proposed project. As necessary, any utilities that would be affected by the proposed project would be relocated in a manner that would minimize disruptions to service. No new utility infrastructure or new connections to existing infrastructure would need to be constructed to accommodate the proposed project.

Consideration of Cumulative Impacts

The consideration of cumulative impacts for public services and utilities is found in Section 15 of this SEPA Checklist.

C. Signature Find help about who should sign

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.

X 

Type name of signee: Randy D. Lewis

Position and agency/organization:

Director of Health, Safety, and Environment

Port of Grays Harbor

Date submitted: 7/27/2023

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