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Public Works Department

General Binding Site Plan Application

The following information or material is required with all general binding site plan applications. If any of this information is missing or incomplete, processing of the application will not begin.

Complete application form

Filing fee of **$500** -Includes eight hours of staff time; additional billed actual

Completed SEPA checklist (non-refundable fee of **$250** may apply for Review/Determination)

**Fee Schedule established in Section 3.030.010 SMC

Three copies of the proposed general binding site plan. *The plan must contain all information noted in Section 20.94.030 and should also contain applicable information typically required for a long subdivision under Section 20.90.020.*

Self-adhesive address labels preaddressed to the latest recorded real property owners within three hundred feet (300') of the property affected by the application, as shown by the records of the Whatcom County Assessor

Property Owner(s): **Name:** Sumas Development - David Grainger

Address: PO Box 1112. Sumas, WA 98295

Applicant(s) Name(s): Sumas Development - David Grainger

Single entity and address to which the City will mail all notices and determinations:

Jeromy De Meyer, Northwest Surveying + GPS
jeromy@nwsurvey.com

Address of Project Location: Kneuman Rd / Barbo Rd.

Assessor's tax parcel number: 410434 110/168

Legal Description of affected property: Tract A, Sytsma LLA as recorded under AF 1980604391

DECLARATION:

I (we) the undersigned hereby declare under penalty of perjury that:

a. The property affected by this application is exclusively owned by the applicant(s) or has been submitted with the consent of all owners of the affected property;

b. The project permit application materials contain no known misrepresentation of fact or proposed action or design that, if completed would result in a structure, improvement, lot, or condition in violation of the Sumas Municipal Code; and

Signature of Applicant(s): Sumas Development

Signature of Property Owner(s): Sumas Development

Date of Submittal: 6-10-2021

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FOR OFFICE USE ONLY BELOW THIS LINE

Date of Notice of Completion to Applicant (mailed): _____

Date of Notice of Application to the Public (mailed, published): _____

Date of Close of Comment Period: _____

Date of Administrator's Decision: _____

Date of Notice of Decision to Public (mailed, published): _____

CITY OF SUMAS
ENVIRONMENTAL CHECKLIST [WAC 197-11-960]

A. BACKGROUND

1. Name of proposed project, if applicable:
Sumas Developments, LLC Phase 3B Binding Site Plan

2. Name of applicant:
David Grainger, Sumas Developments, LLC

3. Address and phone number of applicant and contact person:
Mr. David Grainger, Principal
PO Box 1112
Sumas, WA 98295
(360) 966-7239

4. Date checklist prepared:
June 11, 2021

5. Agency requesting checklist:
City of Sumas, WA (City)

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

Project Background

Sumas Developments, LLC (SDL) owns a 48.75-acre property, located east of Barbo Road, west of Bob Mitchell Avenue, and north of the Burlington Northern Railroad (BNRR)(Figure 1). SDL is developing the parcel with light industrial uses, with the work being accomplished in four phases. The project capitalizes on the presence of the existing railroad, connections to the existing Heavy Haul road on Bob Mitchell Avenue, siting within lands zoned for industrial development within Sumas, and adequate land for the facilities.

The 48.75-acre SDL property was the subject of a previous SEPA Checklist in 2011 for Phases 1 & 2, which entailed filling wetlands, construction of infrastructure, and construction of the SDL Reload Facility on the eastern portion of the SDL property. SDL has completed the construction of the rail transfer and shipping facilities on Tract A to meet the growing demand for multi-use shipping facilities. Allied-Rabanco, Aggregates West, Cal Portland, and other shipping companies use the facilities for storing and preparing commodities, recyclables, rail ballast, and solid waste for shipping. The facility specializes in serving full-unit shipments, wherein full unit sealed containers loaded with materials are shipped making direct delivery more efficient. Allied-Rabanco ships solid waste in sealed containers from Canada to the Roosevelt Cogeneration plant in the United States for processing. Cal Portland uses the facility to ship cement powder and roofing granules from US suppliers to Canada. Per conditions of the 1999 City of Sumas Shoreline Permit and the 1999 WDOE Water Quality Certification, no hazardous materials are stored or transported at the SDL Reload Facility.

The City of Sumas issued a Determination of Non-Significance (DNS) for Phases 1 & 2 of the project on August 8, 2011. Work accomplished in Phases 1 & 2 included:

1. Fill wetlands on the site and complete construction of the wetland mitigation at the SDL mitigation site on Kneuman Road.
2. Construct the SDL Reload Facility on the eastern 12 acres of the site.

3. Initiate construction of approximately 1,000 linear feet (lf) of the Canadian Weight Compliance Road (CWCR or 'Heavy Haul Road). The Heavy Haul Road will need to be paved to be completed.
4. Construct 1,800 lf loading railroad track extending from east to west and two switching tracks to store full unit containers while they are waiting to be loaded/unloaded for a total of 6,000 lf of new track. The loading and switching tracks connect to the BNRR track. (NOTE: 600 lf were actually constructed in Phase 2, leaving up to 5,400 lf to still be constructed).
5. Construct storm water management facilities, including sedimentation pond, biofiltration swales, and a conveyance system. The storm water system was constructed to meet the City of Sumas Municipal Code and the WDOE 2005 Storm Water Manual.

The 2011 SEPA Checklist anticipated the creation of a Binding Site Plan in Phase 3 and development of individual lots in Phase 4. The 2011 SEPA Checklist described the anticipated phasing as follows:

*"**Under Phase 3**, a SEPA Checklist and review for a Binding Site Plan would be completed. Under this phase, the exact dimension and location for all project elements described above would be presented in the proposed Binding Site Plan and submitted for review and approval by the Sumas City Council.*

If these infrastructure elements are to be constructed in Phase 3, City approval of the road, utility, and stormwater plans, and the design of these elements will be required. A WDOE NPDES permit and a City of Sumas Grading Permit will be required in addition to the SEPA approval for the Binding Site Plan. If structures are constructed under Phase 3, a City Building Permit will also be required. The USACE Individual Permit, WDOE Water Quality Certification, and City Shoreline permit (currently under agency review via a JARPA) would all apply to Phase 3 also and would only need reapplication and/or updating if significant changes were made to the project uses, elements, etc. from those approved in the issued permits.

***Phase 4:** Under Phase 4 the Reload Facility property would be broken into individual lots and the lot purchasers or lessees would need to apply for SEPA approvals for Specific Binding Site Plans for the individual lots. If the construction of the infrastructure was not completed under Phase 3, Phase 4 construction would include constructing the Heavy Haul Road, railroad, structures, parking areas, utilities, etc. Additional construction on each lot can be included in these SEPA reviews. Building permits and any additional fill and grade permits can also be completed under Phase 4 if construction occurs on individual lots."*

Phases 3A and 3B: Phase 3 is being constructed in two stages. Phase 3A entailed filling and grading of the westernmost 35 acres of the overall 48.75-acre SDL industrial property. Phase 3A included the following elements:
- Fill and grade in the westernmost 35 acres;
- Construct up to 5,400 lf of loading railroad track extending from east to west; and
- Construct temporary and permanent storm water management facilities.

A SEPA Checklist was prepared for Phase 3A and the City issued a DNS for Phase 3A in 2019. Phase 3A work under the 2019 DNS is on-going. The status of Phase 3A elements is summarized below:
- Fill and grade in the westernmost 35 acres: Prep-work, stripping, cleaning ditches, and filling are all on-going.
- Construction up to 5,400 lf of loading railroad track: The grading work for the new loading track has begun.
- Construct temporary and permanent storm water management facilities: All of the new bio filtration swales have been installed and some of the temporary and permanent storm water ponds have been constructed.
- Construct up to 5,400 lf of loading railroad track extending from east to west:

This SEPA Checklist reviews Phase 3B which entails creation of the General Binding Site Plan (GBSP) over the entire 48.75-acre SDL industrial property with review and approval of agreed-upon infrastructure and elements, including roads and utilities.

Phase 4: Phase 4 will entail the development of the development lots established under the Specific Binding Site Plan (SBSP). This phase is anticipated to begin in 2022 and take up to five years to complete. Various light industrial projects are anticipated to locate at the SDL Development site. Each project will need to work with the City of Sumas to determine if they need additional SEPA review to address specific issues associated with the individual project.

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

Yes. Under Phase 4, various light industrial projects will locate at the SDL Development site. Each project will need to work with the City of Sumas to determine if they need additional SEPA review to address specific issues associated with each individual project. After Phase 4 is complete, the site will be built out and no further construction is anticipated.

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

- Wetland Determination Report for Southwest Corner of Sumas Developments, LLC Reload Facility, Douglass Consulting. 2010.
- Biological Assessment for SDL Reload Facility. Douglass Consulting. 2010.
- Cultural Resources Analysis for SDL Reload Facility. Douglass Consulting. 2010.
- Wetland Mitigation Plan for SDL Reload Facility. Douglass Consulting. 2010.
- Alternatives Analysis for SDL Reload Facility. Douglass Consulting. 2010
- Phase I Environmental Site Assessment for Pacific Rim Reload, LLC. GeoEngineers, Inc. 1998.
- 3rd Supplement to Drainage Report for Sumas Development. Reichhardt & Ebe, Engineering, Inc. 2005.
- 4TH Supplement to Drainage Report for Sumas Development, Reichhardt & Ebe Engineering, Inc. 2017.
- Pacific Rim Reload Modifications Stormwater Narrative for Sumas Development, Reichhardt & Ebe Engineering, Inc. 2021
- JARPA for SDL Reload Facility, 2010.
- Studies and reports prepared for wetland mitigation; Alternatives Analysis, and previous SEPA Checklist prepared between 1999 and 2005. Bexar Environmental Consulting, Ltd, and Reichhardt & Ebe Engineering, Inc.

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 other applications pending for the other proposals affecting the property. The USACE issued the Clean Water Act (CWA) Individual Permit for wetland fill over the entire 48.75-acre SDL property in October 2012. The WDOE issued an Individual Water Quality Certification on November 4, 2011; and the City of Sumas issued a Shoreline Substantial Use permit for the entire SDL development project on August 23, 2011.

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

The following permits are being sought for SDL Phase 3B:

- City of Sumas Determination of Non-Significance under the State Environmental Policy Act (SEPA);
- General Binding Site Plan approval; and
- Fill and Grade permit for final grade of Heavy Haul road and remainder of utilities.

Under Phase 4, various light industrial projects will locate at the SDL Development site. Each project proponent of the future projects that seek to locate at the SDL industrial site will need to work with the City of Sumas to determine the level of SEPA review required to address specific issues

associated with the individual project, as well as all additional City-issued permits that may be required.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

Phase 3B Project Description

This SEPA Checklist is prepared to address the work to be completed under Phase 3B for the GBSP. Figure 1 shows the 48.75-acre SDL industrial site, and the adjacent 29-acre SDL mitigation site. Figure 2 shows the GBSP with locations of easements, Heavy Haul Road, ditches, utilities and bio filtration swales to be maintained. Phase 3B will include the following elements:

- Establish a 60-foot easement for the Heavy Haul Road to be dedicated to the City of Sumas. Construct Grainger Way, an internal Heavy Haul Road that will be located south of the northern property boundary. Grainger Way will connect to Bob Mitchell Avenue to the east and will extend to the west where it will terminate mid-way between Bob Mitchell Avenue and Barbo Road. Grainger Way will be 24 feet wide with (2) 12-foot wide lanes surfaced with asphalt. There will be a drainage ditch along the south edge of the road. There will be street lights on the south side of the road and a heavy duty concrete crossing to cross the Burlington Northern rail tracks..
- Establish a 20-foot wide utility easement immediately south of the northern property boundary.
- Add one 30-foot long, 8-inch stub gravity sewer to that will connect to an existing manhole.
- Extend the existing water main along the north side of Grainger Way to the west by approximately 1,000 linear feet.
- Install fire hydrants along Grainger Way.
- Maintain the existing 20-foot wide biofiltration swale drainage tract and restore to original design.

See Attachment 1. Reichhardt & Ebe Narrative of the Phasing, history, stormwater design, and permitting history of the Pacific Rim Reload improvements project, dated June 7, 2021;

See Attachment 2. Property Owners within 300-feet of property; and

See Attachment 3. Preliminary Drawings for Heavy Haul road, ditch and utility design drawings and details.

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.

SDL owns a 48.75-acre property located at 309 Bob Mitchell Way in Sumas, Washington, east of Barbo Road, west of Bob Mitchell Avenue, and north of the BNRR railroad (Township 41N, Range 04E, Section 34). The site is planned and zoned for industrial use.

Immediately north of the SDL property and south of Kneuman Road, SDL owns an approximately 29-acre parcel that is being restored as a wetland mitigation site. Figure 1 shows the location of the SDL mitigation site and Figure 3 shows the Mitigation Master Concept drawing. A wetland hydrologic regime was restored to the entire mitigation site in 1999. The eastern 15 acres of the 29-acre site enhanced

by removing invasive species and planting native trees, shrubs, and emergent species in 2014. The western 14 remaining acres were enhanced with native plant species in fall 2020 and spring 2021.

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other

The 48.75-acre SDL Binding Site Plan area, along with and the 29-acre mitigation site, was originally part of the William Systma dairy farm from the 1950s to the late 1990s. The majority of the property was managed for hay production with the remainder of the property being used for grazing and livestock production.

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

The SDL Binding Site Plan area is generally flat, sloping slightly to the north with elevations of 42 to 44 feet above sea level. Average slope on the site is 1% with the steepest slopes being approximately 3%.

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 prime farmland.

Information regarding the soils on the project site has been obtained from the National Cooperative Soil Survey, Web Soil Survey, Whatcom County Area, Washington (USDA Natural Resources Conservation Service (NRCS). The NRCS web soil survey indicates soils on the proposed SDL Reload Facility site consist primarily of Sumas silt loam, drained, 0 to 2 percent slope (Map Unit 162), with a small area of Puget silt loam, drained, 0 to 2 percent slopes (Map Unit 123) in the southwest corner of the site. Sumas silt loam and Puget silt loam are both very deep, poorly drained soils formed in recent alluvium. NRCS lists the on-site soils as hydric, and as prime farmland soils when drained. The soils on-site were once drained to allow agricultural production.

DC conducted field investigation of soils on the subject property to supplement information described in the Web Soil Survey. Test pits were excavated to depths up to 16.0 inches below the ground surface, in and near the identified wetland areas. The sampled soils showed the presence of silt loams conforming to Sumas silt loams, and clay loams, conforming most closely to Puget silt loam, drained, 0-2% slopes. The areas of clay loams extended beyond the mapped area of Puget silt loam. The observation appears to correspond with the Soil Survey's description of small areas of Puget silt loam within the mapped area of Sumas silt loam.

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

No, the Whatcom County Critical Areas Ordinance (CAO) Geologically Hazardous Areas Map (February 2006) does not indicate the presence of unstable soils in the project vicinity.

The County CAO Geologically Hazardous Areas Map showed the site is located within a "moderate to high" risk area for seismic hazards liquefaction susceptibility, a "D-E" rating for potential for enhanced ground shaking; and within a Case 1 debris flow region for volcanic hazards (WDNR 2004).

e. Describe the purpose, type, and approximate quantities of any filling or grading proposed.
Indicate source of fill.

Filling and grading in the westernmost approximately 35 acres of the entire 48.75-acre SDL industrial area is ongoing under the Phase 3A DNS and Fill and Grade Permit. Below is a summary of the filling and grading activities and quantities that were approved under the City of Sumas, Phase 3A DNS and Fill and Grade permit:

Earthwork on the 36.75 acres includes filling, excavation, and grading. Fill will be placed to bring

elevations from the current 42' elevation to a minimum 44-foot elevation per requirements of the City of Sumas Flood Damage Prevention Ordinance (14:30 Sumas Municipal Code (SMC)). This will entail excavating approximately one foot of topsoil from the site and replacing it with approximately 2.5 feet of compacted gravel fill. Additional excavation will be accomplished for the storm water ponds. This amounts to approximately 40,000 CY of excavation and 147,000 CY of gravel fill over the site. The project will use fill material consisting of sand and gravel from an existing pit west of Sumas, Washington. The fill material used will meet the specifications prepared by the project soil engineers.

Phase 3B will entail a small quantity of filling and grading. Much of the grading to establish base elevations for the internal Heavy Haul Road was completed in Phase 3a. Similarly, grading to install the water line and other utilities was completed with the grading under Phase 3A. Some grading will be required in Phase 3B to complete final elevations and finished surface for the internal Heavy Haul Road; to complete the gravity sewer; and complete installation of all utilities. The total quantity of excavation in 3B is estimated to be 5,000 cubic yards. The total quantity of fill in Phase 3B is estimated to be 12,444 cubic yards. The project will use fill material consisting of sand and gravel from an existing pit west of Sumas, Washington. The fill material used will meet the specifications prepared by the project soil engineers.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.
Erosion would not be expected to result from the proposed construction of the Heavy Haul road, utilities, and maintaining the existing storm water bio filtration swales. The low gradient (0 to 2% slope) silt loam soils on the proposed expansion site exhibit very slow storm water runoff and present no erosion hazard (NRCS 1992).

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?
After the construction of the Heavy Haul road, utilities, and maintenance of the existing biofiltration swales under Phase 3B is complete, approximately 80% of the site will be in impervious surfaces.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:
In Phase 3B, construction of the Heavy Haul road and utilities, and maintenance of the existing biofiltration swales will be scheduled to occur during the months with the least amount of rainfall at the site, from May through September.

Temporary erosion and sedimentation measures (TESC) will be installed prior to construction, including sedimentation fencing and/or straw wattles to protect the adjacent wetland mitigation site during construction. Temporary sedimentation ponds to collect and treat construction storm water. Best Management Practices (BMPs) will be implemented throughout construction of the roads, utilities, and storm water facilities. BMPs could include: silt fences, use of stabilized construction entrances, catch basin inserts, and triangular silt dikes, and temporary sedimentation ponds.

Storm water from construction of the road and utilities, extending the sewer line will be treated in the storm water facilities constructed in Phase 3A. The storm water facilities include collection and conveyance systems, detention ponds, and biofiltration swales.

2. Air

a. **What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known. normal construction dust will be emitted during the construction phase.**
During the construction of the Heavy Haul road and utilities, and maintenance of the existing bio filtration swales in Phase 3B, there could be temporary and localized minor increases in suspended

particulate matter due to equipment emissions and dust from ground disturbing activities. However, with implementation of standard abatement measures such as equipment maintenance and dust control measures, the project should not result in emissions that exceed applicable standards or substantially affect ambient air quality.

In Phase 4, after the GBSP is established and the infrastructure is completed, there will be new lots created. Project proponents will work with the City of Sumas to determine the scope of, and to complete, any required project-specific SEPA reviews. Potential impacts to air from the construction and operation of individual facilities will be addressed at that time.

b. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**
No, there are no off-site sources of emissions or odor that would affect the proposed construction activities at the SDL industrial site.

c. **Proposed measures to reduce or control emissions or other impacts to air, if any:**
To avoid effects on ambient air quality during construction of the Heavy Haul road and utilities:
- Exposed soils shall be watered as necessary to decrease suspended particulate matter; and
- Construction vehicles shall be maintained in good working condition to minimize emissions

3. Water

a. Surface:

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 SDL site area lies within the Sumas Creek watershed, which includes land tributary from British Columbia to the north and the area between Sumas Creek and Johnson Creek to the south. There are no streams, lakes, or ponds on or near the property. The property did have several small wetlands on it and these were filled in 2013 under a Clean Water Act (CWA) permit from the US Army Corps of Engineers (USACE), issued in October 2012. Mitigation for the wetland fill was accomplished at the SDL Mitigation site, located immediately north of the project site along Kneuman Road.

2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.
Yes. The project will be located immediately south of the SDL mitigation site. There is a 75-foot buffer along the southern boundary of the mitigation area between the SDL GBSP area and the mitigation site.

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.
There will be no fill placed in wetlands as a result of construction of the Heavy Haul road and utilities, or establishing a GBSP in Phase 3B.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.
The proposed construction of the storm water facilities and railroad loading track in Phase 3A will not require any surface water withdrawals or diversions.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
Based on computer modeling of flood elevation changes due to development, the City's FEMA-

approved Flood Damage Prevention Ordinance designates particular flood-prone areas in which specific development constraints apply. The Flood Insurance Rate Map (FEMA 2004) designates most of the site within the 100-year floodplain, with a small (500-foot wide) strip encompassing the BNRR rail that is elevated above the 100-year flood elevation (Figure 4). The 100-year flood elevation in the area is about 45 feet above sea level. Most of the site is approximately 42-44 feet above sea level.

The project site does not lie within a City-designated Flood Risk Zone or Flood Corridor, in which development options are very constrained. Within the industrial-zoned area encompassing the project site, unlimited placement of fill within the 100-year floodplain is allowed without mitigation for lost flood storage capacity.

6) **Does the proposal involve any discharges of waste materials to surface waters? If so,**
describe the type of waste and anticipated volume of discharge.
No.

b. Ground:

1) **Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.**
No.

2) **Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the**
number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.
None. Wastewater from light industrial facilities that will be constructed in Phase 4 will be discharged into the municipal sewage system.

c. Water runoff (including stormwater):

1) **Describe the source of runoff (including stormwater) 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.**

Natural precipitation is the source of storm water runoff on the site. At the SDL Reload Facility site immediately to the east of the GBSP area, storm water moves via sheet flow or is captured in catchment basins and routed into the storm water ponds and then into the biofiltration swales, located in the southern buffer of the SDL mitigation site. At the westernmost 35 acres of the SDL industrial site, storm water flows via sheetflow to the north into the undeveloped portion of the SDL mitigation area.

2) **Could waste materials enter ground or surface waters? If so, generally describe.**
Based on the distance to any surface waters, it is anticipated that there would be minimal risk that waste materials could enter ground or surface waters via storm water from the project site during construction of the Heavy Haul road, utilities and maintenance of the existing biofiltration swales.

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

Work under the approved Phase 3A DNS and Fill and Grade permit includes the construction of storm water management facilities to treat all storm water generated at the site. The storm water facilities are the subject of a storm water plan and drainage report that was designed and updated in 2011 in accordance with the 2005 WDOE SWMM.

The facilities includes a storm water collection system, treatment ponds, biofiltration swales and conveyance features. The rate of storm water runoff will be controlled by detention ponds sized per the 2005 WDOE SWMM. Water quality will be maintained by the constructed sedimentation ponds and the biofiltration swale system. The biofiltration swales have plantings of grass species to provide additional water quality treatment.

The biofiltration swales are located within the southern buffer for the SDL wetland mitigation site. The treated storm water will discharge from the biofiltration swales into the north-south ditches that flow north through the wetland mitigation site. These ditches then flow into Sumas Creek which flows eastward in the roadside ditch along Kneuman Road. See the attached Reichhardt & Ebe, *Narrative of the Phasing, history, stormwater design, and permitting history of the Pacific Rim Reload improvements project,* dated January 25, 2021.

Based on the measures described above and implemented in Phase 3A, no significant impacts to surface, ground, or runoff water are anticipated as a result of constructing the Heavy Haul road, completing the installation of utilities, and maintaining the existing biofiltration swales.

4. Plants

a. Check or circle types of vegetation found on the

SDL Reload Facility site:

X_____ deciduous tree: alder, maple, aspen, other
_____ evergreen tree: fir, cedar, pine, other
X_____ shrubs
X_____ grass
X_____ pasture
_____ crop or grain
_____ wet soil plants: cattail, buttercup, bulrush, 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?

Much of the proposed SDL GBSP area has been stripped of vegetation and is in process of filling and grading. The remaining vegetation is dominated by stands of reed canarygrass, an invasive grass species, with some areas of Himalayan blackberry. There is one swale that supports native tree and shrubs connecting the SDL mitigation site to a forested wetland located on the Hesselgrave property, located immediately south of the SDL GBSP area. This planting of trees and shrubs serves as a wildlife corridor between the wetland areas.

The only vegetation that will be removed for construction of the Heavy Haul road and utilities will be reed canarygrass and several stands of Himalayan blackberry. The plantings of native trees and shrubs within the wildlife corridor will be preserved. After removal of the reed canarygrass, and with the exception of the wildlife corridor, the project site will remain unvegetated and will consist of primarily impervious surfaces.

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

No threatened or endangered plant species are known to occur on or near the proposed SDL industrial site.

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

None proposed as part of Phase 3B. In Phase 4, individual projects may elect to have some landscaping installed as part of their facility design.

5. Animals

a. Birds and animals which have been observed on or near the site or are known to be on or near the site:

Birds: various songbirds; raven, occasionally eagle flying over the site
Mammals: small mammals typical of agricultural fields (e.g. mice, moles, voles, etc.)
Fish: None

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

DC completed a Biological Assessment (BA) for the SDL Reload Facility in December 2010. The action area evaluated within the BA included those areas within a 0.25-mile radius surrounding the proposed SDL Reload Facility site and wetland mitigation site. Portions of Sumas Creek are located within the action area.

The BA addressed potential project-associated effects on plant and animal species that have been listed, are proposed for listing, or are candidate species for listing under the federal Endangered Species Act (ESA). Project-associated effects on Essential Fish Habitat (EFH) as mandated by the Magnuson-Steven Fishery Conservation and Management Act and amended by the Sustainable Fisheries Act of 1996 (Public Law 104-267) were also considered in the BA. The BA finds that direct effects on protected salmonid habitat would not be associated with the project, due to the distance of these habitats from the project site. Indirect effects on protected salmonid habitat would be avoided by treatment of all storm water generated by the project, as all run-off from the project site would be detained and treated prior to release.

The the SDL industrial site does not have any documented presence of listed species on or near the property. The site is located approximately 600 feet south Sumas Creek. The SDL mitigation site is located between the SDL industrial site and Sumas Creek. Based on the absence of documented listed species at the project site and the distance from Sumas Creek, the proposed construction of the Heavy Haul road, installation of utilities, maintenance of the biofiltration swales, and establishment of a GBSP will not impact threatened or endangered species.

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

The project area lies within the Pacific Flyway that covers the western Pacific states from Canada to Mexico.

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

The wildlife corridor on the SDL industrial site property that connects the SDL wetland mitigation site to the forested wetland on the Hesselgrave property, adjacent to the south will be preserved. Internal roads that cross the wildlife corridor will have oversized culverts installed to allow small mammals to pass safely through.

6. **Energy and natural resources**

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The SDL industrial site will rely upon electricity and natural gas for energy sources on-site. The vehicles, operating equipment, transportation trucks and rail will rely upon fossil fuels.

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

No.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:
None.

7. **Environmental health**

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

No. Construction of the Heavy Haul road, installing the utilities, maintaining the existing biofiltration swales, and establishing a GBSP will not result in any of the above-listed environmental health hazards.

In Phase 4, after the GBSP is established and the infrastructure is completed, individual lots will be created to develop light industrial facilities and operations in the area. Project proponents will work with the City of Sumas to determine the scope of, and to complete, any required project-specific SEPA reviews. Any potential for environmental health hazards from the construction and operation of each facility will be addressed at that time.

1) Describe special emergency services that might be required.
None.

2) Proposed measures to reduce or control environmental health hazards, if any:
All Occupational Safety and Health Administration (OSHA) and WDOE standards regarding environmental and human health will be met during grading and filling and construction of the storm water facilities and the loading railroad track, for the SDL industrial site.

b. Noise

1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?
The primary sources of noticeable noise at the SDL industrial site include: truck and rail traffic from the SDL Reload Facility; existing industrial uses from manufacturers and industries located to the south and southeast of the site; traffic on Kneuman Road to the north and Barbo Road to the west of the project site. Industrial noise and traffic noise levels associated with these sources are both low to moderate. Such noise would not affect the proposed project. The surrounding land uses are dominated by industrial and agricultural uses and impacts to residences should be minimal.

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.

During Phase 3B to establish the Binding Site Plan, there could be temporary and localized minor increases in noise related to the construction of roads, utilities, and maintaining the existing biofiltration swales. The slightly increased noise levels will be temporary and will only occur during work hours from 7:00 am until 6:00 pm.

In Phase 4, after the GBSP is established and the infrastructure is completed, there will be individual lots created for industrial companies.These facilities are not defined at this time but it is presumed that the operating hours will be consistent with the working hours for the permitted Industrial Zoning. Project proponents will work with the City of Sumas to determine the scope of, and to complete, any required project-specific SEPA reviews. Any potential for noise impacts from the construction and operation of each facility will be addressed at that time.

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

To minimize temporary construction-related effects on ambient noise levels:

1. Construction work would be conducted during peak working hours of 7:00 am to 6:00 pm on Monday through Friday and occasionally on Saturdays.
2. Construction vehicles shall be maintained in good working condition.

8. **Land and shoreline use**

a. What is the current use of the site and adjacent properties?
The SDL industrial site is zoned for industrial use. The site is currently used as a heavy use intermodal site primarily for transloading various products such as propane gas, limestone and aggregate products, cement products, hydro poles, logs and lumber, recyclables, and solid waste products from truck to rail and rail to truck. The adjacent properties to the south and east are in industrial uses (Figures 5 and 6). The property immediately to the west is in agricultural use and the property immediately to the north is the SDL wetland mitigation site.

b. Has the site been used for agriculture? If so, describe.
Yes, historical aerial photographs indicate the SDL industrial site was used for agriculture (feed corn and pasture) from the 1950s until the mid-late 1990s. NRCS lists the soils on-site as prime farmland soils when drained.

c. Describe any structures on the site.
There are no existing structures on the SDL industrial site property.

d. Will any structures be demolished? If so, what?
No.

e. What is the current zoning classification of the site?
The SDL industrial site is zoned for industrial use.

f. What is the current comprehensive plan designation of the site?
The SDL industrial site is designated for industrial use according to the City of Sumas Comprehensive Plan. This zone allows manufacturing, warehousing wholesale, and selected retail business. Heavy manufacturing is permitted by conditional use.

g. If applicable, what is the current shoreline master program designation of the site?
The City of Sumas Shoreline Environments Map designates the SDL industrial site as being situated within the 100-year floodplain. (Figure 7).

h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.
No area designated by the City of Sumas as a 'Critical Area' is present on the SDL industrial site. As discussed above, the SDL industrial site is located in an area designated as within the 100-year floodplain regulated under the City's Flood Damage Prevention Ordinance.

i. Approximately how many people would reside or work in the completed project?
Construction of the Heavy Haul road, installing utilities, and maintaining the existing biofiltration swales during Phase 3B will provide some limited temporary employment for the construction. No people will reside at the site.

In Phase 4, as individual projects are constructed at the site, there will be long-term employment opportunities. How many people will work at the future facilities is unknown at this time. Project

proponents will work with the City of Sumas to determine the scope of, and complete project-specific SEPA reviews, as needed. Levels of employment provided by the construction and operation of each facility will be addressed at that time.

j. Approximately how many people would the completed project displace?
None.

k. Proposed measures to avoid or reduce displacement impacts, if any:
None.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:
The project will comply with the City of Sumas Comprehensive Plan, Zoning Ordinance, Flood Damage Prevention Ordinance, Shoreline Master Program, and any permit conditions from the SEPA findings.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.
None.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.
None.

c. Proposed measures to reduce or control housing impacts, if any:
None.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?
There will be no buildings constructed in Phase 3B. Phase 3B entails solely of constructing the Heavy Haul road, installing the utilities, and maintaining the existing bio filtration swales.

In Phase 4, it is anticipated that several structures will be constructed on the site to house light industrial facilities. The dimensions and heights of these buildings are unknown at this time. Project proponents will work with the City of Sumas to determine the scope of, and complete project-specific SEPA reviews and building permits, as needed. Size and heights of buildings associated with each facility will be addressed at that time.

b. What views in the immediate vicinity would be altered or obstructed?
There will be no alterations of views associated with Phase 3B, which will consist of constructing a Heavy Haul road, installing utilities, and maintaining existing biofiltration swales.

In Phase 4, after the Binding Site Plan is established and the infrastructure is completed, it is anticipated that several structures will be constructed on the site to house light industrial facilities. The sizes and heights of any buildings to be proposed are not defined at this time but it is presumed that the structures will be consistent with the permitted Industrial Zoning. Project proponents will work with the City of Sumas to determine the scope of, and complete project-specific SEPA reviews, as needed. Any potential for impacts to views resulting from the construction and operation of each facility will be addressed at that time.

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

None for Phase 3A or Phase 3B.

Measures to reduce or control aesthetic impacts of individual projects to be constructed in Phase 4 will be addressed when project proponents complete project-specific SEPA reviews with the City of Sumas.

11. Light and glare

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

One street light will be installed as part of the construction of the Heavy Haul road in Phase 3B, located at the intersection of the Heavy Haul road and Bob Mitchell Way. This light will be shielded and pointing downward, consistent with standards for public street lighting.

During construction of individual projects in Phase 4, security lighting for individual projects may be installed. It is presumed that some lighting would occur at night. The specific quantity and types of lighting to be proposed are not defined at this time but it is presumed that the lighting will be consistent with the permitted Industrial Zoning.

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

The single street light that will be installed during Phase 3B is for the purpose of illuminating the intersection for public safety. It will not present a safety hazard or interfere with views in the industrial area.

In Phase 4, project proponents will work with the City of Sumas to determine the scope of, and complete project-specific SEPA reviews, as needed. Any potential for impacts from light or glare resulting from the construction and operation of each facility will be addressed at that time. At a minimum, any lighting for individual projects will be directed away from the SDL wetland mitigation site to avoid impacts to wildlife. Any lights will also be directed away from Barbo Road and will not be a safety hazard.

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

None.

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

No measures are needed for Phase 3B for the Binding Site Plan and construction of roads and infrastructure.

In Phase 4, some measures such as directing lights away from the wetland mitigation site to avoid impacts to wildlife and/or shielding lights or deflecting lights downward to reduce visual impacts will likely be needed for subsequent phases. These measures will be defined more specifically in subsequent SEPA reviews for individual facility development in Phase 4.

12. Recreation

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

Local recreational opportunities presently available the City of Sumas include:

1) While it has been designated as a park for many years, the construction of a destination ball-field complex at Howard Bowen Park provides a significant formal recreational opportunity in the City of Sumas. Bowen Park provides a baseball field complex with five full-size ballfields. The park has a paved parking lots with 150+ stalls, RV and tent camping, and restrooms with showers. The fields are lit for night playing. Bowen Park has large mature trees, grass areas, and covered picnic seating and is adjacent to an RV park for overnight accommodations.
2) Italian Motors Kart Track was constructed on the south side of Front Street and provides a destination kart racing recreational facility. This facility provides kart racing training, competitions, and special events for the community of Sumas and racers who tour the circuits.

3) Sumas is just a few miles from Mount Baker recreational ski area that has skiing, snowboarding, hiking, and other recreational opportunities.

b. Would the proposed project displace any existing recreational uses? If so, describe.
No.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:
None.

13. Historic and cultural preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.
None documented or known.

b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

Cultural resource reports filed with DAHP in association with previous ventures in the vicinity of the currently proposed project do not indicate the likely presence of significant cultural resources in the area:

- The *Cultural Resources Assessment of the Proposed NESCO Boundary Paper Mill Project, Whatcom County, WA* (NADB # 1339673, Historical Research Associates, Inc. (HRA) 1995) was prepared for the proposed development of a paper mill, power plant, and associated pipeline on property immediately opposite the currently proposed SDL Reload Facility site, across the BNRR rail. The southeastern corner of the SDL Reload Facility APE is approximately 200 feet from the northwest corner of this study site.
- The assessment included a field survey of the project property via surface inspection and auger tests. One prehistoric lithic isolate was identified on the property, however HRA did "not consider this isolate to be significant" and recommended "no further fieldwork."
- The *Heritage Resources Investigations for the Lynden Border Patrol Facility, Sumas, Whatcom County, Washington* (NADB # 134937, Northwest Archaeological Associates, Inc. (NWAA) 2003) was completed for the proposed construction of administrative offices, a fitness center, and helicopter pad on a ten-acre parcel approximately one half mile southwest of the SDL Reload Facility site. The study involved field investigation of the project site, utilizing shovel scrapes and shovel probes along transects at 5-meter intervals. The investigation identified three fragments of fire-modified rock (FMR). Such FMR is typically the by-product of prehistoric cooking may represent a single food processing event or evidence of habitation. However, NWAA concluded that the likelihood of "in situ" cultural features on the study site was low, because "occupation sites are more likely to occur on areas of higher relief above the valley floor floodplain."
- A Washington Archaeological Site Inventory form was completed on June 25, 2003 (Site # 45WH00634) for a proposed WSDOT wetland mitigation site in a cornfield located approximately one half mile southeast of the SDL Reload Facility site. The site was found to contain a light scatter of historic debris associated with past structures. The latest buildings on the site were removed in 2000. The density of exposed surface debris varied, however, surface reconnaissance and shovel testing identified no historic features. The average origin period of the surface artifacts was estimated to be 1889-1912. No prehistoric artifacts or features were identified.

- After reviewing the information discussed above, SDL has concluded that the APE for the proposed expansion project does not contain, and is not adjacent to, known cultural resources. In addition, based on previous investigations of similar sites in the project area, it is not considered likely that the proposed project site would contain significant cultural resources. No cultural or archaeological resources were found during the fill and grading activities conducted between 2001 and 2013 on 12 acres of Phases 1 and 2 of the SDL Reload Facility. Based on the above findings, construction of infrastructure for the Binding Site Plan is not expected to

affect historic properties or archaeological sites.

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

While it is considered unlikely that the proposed project would affect significant cultural resources, the potential for an inadvertent discovery does exist. The State Historic Preservation Officer (SHPO) establishes and approves plan in the event of an inadvertent discovery of cultural resource during construction activities. Such a plan will be tailored to the nature of the discovery and will be implemented should an inadvertent discovery occur. The following measure shall be implemented during the fill and grading activities and construction of the storm water facilities and loading railroad track to avoid potential impacts to cultural resources:

Should archaeological materials (e.g. shell midden, faunal remains, stone tools, etc.) or human remains be observed during construction activities, all work in the immediate vicinity shall stop immediately and the area shall be secured. The project manager and/or property owner shall contact the SHPO office and may also contact an archeological consulting firm immediately to assess the situation and determine the necessary actions to take to preserve all protected cultural resources. Compliance with all applicable laws pertaining to cultural resources is required.

14. Transportation

a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any.

The SDL industrial site will be served by Bob Mitchell Avenue, a Heavy Haul route to the east and Grainger Way, the internal Heavy Haul road that will be constructed in Phase 3B and will connect to Bob Mitchell Avenue. The BNRR is located along the southern border and will provide transport of commodities, recyclables, rail ballast, and solid waste for shipping.

b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

The immediate area adjacent to the SDL industrial site is not served by public transit. However, the Whatcom Transportation Authority (WTA) serves downtown Sumas via Route 71X "Bellingham Express", stopping at 420 Cherry Street on weekdays and Saturdays. This bus stop is approximately 0.5 miles away in downtown Sumas.

c. How many parking spaces would the completed project have? How many would the project eliminate?

Phase 3B does not include any specified new parking spaces, nor will any existing parking spaces will be eliminated by the activities in Phase 3B.

In Phase 4, project proponents will work with the City of Sumas to determine the scope of, and complete project-specific SEPA reviews, as needed. Parking needs for each facility will be addressed at that time.

d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

Phase 3B, establishes a GBSP, and includes constructing Grainger Way, the Heavy Haul road to serve the internal lots that will be established in Phase 4. The Heavy Haul road will be located on the northern boundary of the property and ends near the midpoint of the property. The road will consist of a 60-foot right of way with 24-foot wide paved surface and 4-foot wide gravel shoulders. The easement for the haul road will be dedicated to the City of Sumas.

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

No water or air transportation would be used during Phase 3B. BNSF railroad tracks run parallel to

the site's southern property boundary. The construction of the additional loading railroad track that was approved under the Phase 3A DNS and fill and grade permit is continuing. When it is complete the track will connect the SDL industrial site to the BNSF railroad line to facilitate rail use.

f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

In Phase 3B, completion of construction of Phase 3A and construction of the Heavy Haul road, utilities, and maintenance of the existing biofiltration swales is estimated to entail up to 50-55 daily vehicle and truck trips at the site during the construction period. Construction activities is estimated to be 4-5 months in duration. Construction vehicles and trucks would use the Heavy Haul road on Bob Mitchell Avenue in order to reach SR 9 and other routes north and south of SR 9. The majority of the new vehicle and transportation truck trips to and from the SDL GBSP would occur during working hours of 7:00 am and 6:00 pm.

In Phase 4, after the Binding Site Plan is established and the infrastructure is completed, there will be two additional lots available for developing light industrial facilities and operations in the area. Lots 2 and 4 are already used for SDL Reload facility. The vehicular trips that could be generated by additional development are not defined at this time. Project proponents will work with the City of Sumas to determine the scope of, and complete project-specific SEPA reviews, as needed. Any potential for impacts to transportation resulting from the construction and operation of each facility will be addressed at that time, along with any measures needed to mitigate for impacts to transportation.

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

The construction of up to 5,400 lf of loading railroad track in Phase 3A is a significant measure that will reduce transportation impacts related to facilities developed as part of the SDL Binding Site Plan. It is estimated that rail will be used for over 50% of the transportation needs for the facilities that will locate at the SDL Binding Site Plan. Because one (1) train with 60 cars transports the equivalent of 180 truck loads, the development of rail reloading and transportation at the SDL property has the potential to reduce truck traffic on local and state roads by 360 truck trips per day (one train trip to the facility and one train trip from the facility daily).

15. Public services

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

In Phase 3B, the construction of the Heavy Haul road, installing utilities, and maintaining the existing biofiltration swales will not require any additional public services.

As individual projects are constructed in Phase 4 there is the potential for an increase in the need for police, fire, and emergency services.

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

During Phase 3B the Heavy Haul road and utilities will be constructed under the GBSP. Project engineers have coordinated with City and utility services to design the water systems with appropriate pressures for fire; hydrants at designated intervals; and appropriate ingress and egress capacity for fire engines and emergency vehicles.

In Phase 4, various light industrial projects are anticipated to locate at the SDL industrial site. In Phase 4, project proponents will work with the City of Sumas to determine the scope of, and complete project-specific SEPA reviews, as needed. The potential need for additional public services that could result from a specific new facility will be addressed at that time.

16. Utilities

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

Natural gas, water, telephone, and sanitary sewer are all available at the SDL industrial site via connections with existing utilities on Bob Mitchell Avenue. Electricity will be connected through existing connections on Barbo Road.

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.

Water, sanitary sewer and electricity are provided by the City of Sumas. Telephone service is provided by Frontier, natural gas is provided by Cascade Gas, and refuse service will be provided by Nooksack Valley Disposal. Storm water will be managed privately on-site. New connections and infrastructure for water, sewer, have already been installed within the ROW of the internal Heavy Haul Road. During Phase 3B, electricity and telephone utilities will be installed within the ROW of the internal Haul Road.

C. SIGNATURE

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

Signature:

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Desiree Douglass

Douglass
CONSULTING

Date Submitted: June 11, 2021