

## ENVIRONMENTAL CHECKLIST

### *Purpose of checklist:*

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

### *Use of checklist for nonproject proposals:*

Complete this checklist for nonproject proposals, even though questions may be answered "does not apply." IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

### **A. BACKGROUND**

#### **1. Name of proposed project, if applicable:**

Grays Harbor Rail Terminal Project

#### **2. Name of applicant:**

Grays Harbor Rail Terminal, LLC

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

Kevin LaBorne  
Grays Harbor Rail Terminal LLC  
3020 Old Ranch Parkway, Suite 300  
Seal Beach, CA 90740  
(562) 799-5572

#### **4. Date checklist prepared:**

March 2014

#### **5. Agency requesting checklist:**

Pursuant to WAC 197-11-938 (9), the Department of Ecology (Ecology) is a co-Lead Agency because the proposal involves construction on a single site of a facility designed for or capable of storing a total of one million or more gallons of any liquid fuel not under the jurisdiction of the Energy Facility Site Evaluation Council (EFSEC). The project site is within the jurisdiction of the City of Hoquiam and the City of Hoquiam is therefore the other co-Lead agency.

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

Construction is planned to begin in late 2014 with operations starting approximately one year later.

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

No future additions to the facility are envisioned at this time. The various physical site constraints do not allow for ease of future additions or expansions.

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

- Joint Aquatic Resources Permit Application
- Industrial and Construction Stormwater Pollution Prevention Plan (SWPPP)
- Olympic Region Clean Air Agency (ORCAA) Approval Order, State of Washington
- Spill Prevention Control and Countermeasures (SPCC) Plan
- Phase I Environmental Site Assessment (ESA)
- Temporary Erosion and Sediment Control (TESC) Plan
- Geotechnical Report
- Critical Areas Report
- Wetlands/Stream Technical Report
- Air Quality Technical Memorandum
- Noise Technical Memorandum
- Cultural Resources Survey
- Fish and Aquatic Habitat Assessment
- Intertidal Technical Memorandum
- Conceptual Mitigation Memorandum
- Traffic Impact Analysis
- Visual Quality Technical Memorandum
- Biological Evaluation for Endangered Species
- Integrated Contingency Plan (ICP)
- Oil/Hazardous Materials Transfer Operations Manual for Class 1 Terminals

**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 or approvals for other proposals affecting the property covered by this proposal.

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

- Nationwide Permit Coverage or Section 10/404 Permits, U.S. Army Corps of Engineers
- Section 10 Permit, Coast Guard
- Compliance with Section 7 of the Endangered Species Act
- Compliance with Section 106 of the National Historic Preservation Act
- Facility Response Plan/Oil Spill Response Plan, U.S. Environmental Protection Agency and U.S. Coast Guard
- Letter of Intent, U.S. Coast Guard
- Facility Security Plan, U.S. Coast Guard
- Hydraulic Project Approval, Washington Department of Fish and Wildlife
- Construction Stormwater General Permit, Washington Department of Ecology
- Industrial Stormwater Permit, Washington Department of Ecology
- Spill Prevention and Response Plan, Washington Department of Ecology
- Hazardous Substance Use Reporting, Washington Department of Ecology
- Olympic Region Clean Air Agency (ORCAA) Approval Order, State of Washington
- Shoreline Substantial Development Permit, City of Hoquiam
- Critical Areas Review, City of Hoquiam
- Fire Department Permit, City of Hoquiam
- Building Permits, City of Hoquiam

- Grading Permit, City of Hoquiam

**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.)**

Grays Harbor Rail Terminal LLC (GHRT) is proposing a bulk liquids rail logistics facility at the Port of Grays Harbor Terminal 3 (T3) property. The facility will accommodate the receipt for transfer to marine vessel of 45,000 barrels per day on average of various liquid bulk materials, specifically, various types of crude oil and condensates.

T3 is a 150 acre industrial site and includes an existing 600-foot- long concrete shipping wharf. The Port of Grays Harbor currently leases approximately 25 acres of the T3 site to a private tenant (Willis Enterprises), which utilizes the property for storing and sorting logs, and operating a wood chipping and processing facility. The tenant utilizes the existing wharf for loading product on to barges for export. The remaining area of the property (a former mill site) is currently occupied by 4 metal buildings and a rail spur line but otherwise is vacant.

The liquid bulk materials would be delivered to the proposed facility via unit trains in fully contained rail cars, unloaded into on-site storage tanks, and then loaded onto barges or other marine vessels for delivery to refineries.

The proposed rail and off-loading facility includes four 20-car yard tracks and two 20-car off-loading or staging tracks (120 rail cars total can be accommodated within the facility footprint). In addition, a “run-around” track would be used to reposition the locomotive engines and could also be used to hold cars awaiting maintenance. The off-loading spots would be equipped with a permanent rack structure between the two off-loading tracks and would support connections for a maximum of 40 rail cars (20 spots on each side of a rack). The off-loading spots and central header would be located within secondary containment. The rack structure includes an elevated steel walkway with extendable access platforms used to access the tops of the rail cars. Off-loading would occur via 4-inch dry break connections, hoses, valves, and risers connecting the bottom rail car couplers to a central piping header. The rail cars would be off-loaded by gravity feed into the central header and the material would be pumped into the on-site storage tanks.

The liquid bulk materials would be stored in approximately six to eight above-ground storage tanks with secondary containment and internal floating roofs until a marine vessel (ship or barge) arrives. All tanks will be located outside the Shoreline District. The total combined tank storage would be approximately 800,000 – 1,000,000 barrels. Construction of multiple storage tanks would allow the facility to accommodate interruptions in rail and vessel schedules as well as changes in delivery volumes, and would allow the facility to maintain consistent operations. The facility is expected to handle 3-5 vessels calls per month.

As noted above, T3 includes an existing 600-foot-long concrete shipping wharf. There are currently four mooring dolphins (three downstream/one upstream) off the existing concrete wharf. Up to four additional mooring dolphins (two downstream and two upstream) would be constructed to provide the necessary mooring support of vessels during liquid bulk materials transfer. No additional overwater expansion of the wharf is proposed. The existing trestle (which supports the Willis conveyor) and the wharf can accommodate the piping needed to transfer the materials from the tanks to the vessels. Stormwater collection, drainage improvements, fire suppression, and spill containment measures would be added to the existing wharf as needed but no structural modifications are necessary.

To facilitate operations at the Grays Harbor Rail Terminal, the Genesee & Wyoming Railroad (owner/operator of the Puget Sound and Pacific Railroad) would be permitting and supervising construction of an industrial lead track extension of their main line railroad system. This industrial lead track would extend from the current main line rail terminus, just east of Paulson Road, for approximately 1,300 lineal feet to the west. The industrial lead track would allow for the backing of rail car strings into the project site and provide additional

flexibility for rail car operations for other railroad customers. The identification of the industrial lead track is to account for potential indirect or cumulative environmental impacts for the purposes of the State Environmental Policy Act (SEPA) only and is not a project component of the Grays Harbor Rail Terminal site development permitting.

- 12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The site is located on the south east corner of SR 109 and Paulson Road in the City of Hoquiam in Township 17 North, Range 10 West north of the Willamette Meridian. See attached Vicinity Map.

**B. ENVIRONMENTAL ELEMENTS**

**1. Earth**

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

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

The topography of the project site is flat, with a very gentle grade south toward the Chehalis River.

- 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.**

The project site is underlain by a variety of normally consolidated deposits including very loose to very dense fill, estuarine deposits, and alluvial deposits. No agricultural soils are found on the project site. Please see the Shannon and Wilson Draft Geotechnical Report for additional details.

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

No landslide hazard areas are identified within the project site based on the soil survey maps and topographic survey data. The risk of landslides within the project site is considered low because of the flat site topography. Although the project site is located near the tidally influenced Grays Harbor estuary, no undercutting by wave action was observed within the project site.

Seismic hazard areas are present within the project site based on the presence of soils that are potentially susceptible to liquefaction. Liquefaction refers to a condition where vibration or shaking of the ground, usually from earthquake forces, results in the development of excess pore pressures in saturated soils and subsequent loss of strength. This can result in vertical oscillations and/or lateral spreading of the affected soils with accompanying surface subsidence and/or heaving. In general, soils, which are susceptible to liquefaction, include loose to medium dense clean to silty sands which are saturated (i.e., below the water table). Within the project site, soils that contain layers of silty sand and sandy silt (Alluvium deposits), located about 40 to 110 feet deep, are susceptible to liquefaction.

The proposed project is also located in a moderately active seismic region. Historically, the region has experienced moderate to large earthquakes, and geologic evidence suggests that larger earthquakes have occurred in the prehistoric past and will occur in the future. The nearest mapped fault in the U.S. Geological Survey is a northeast trace of the Saddle Hill Fault Zone. This fault zone consists of short, discontinuous traces that trend northeast-southwest for a distance of approximately 16 miles. The project site is located approximately 10 miles southeast of the most northeastern trace. Evidence of recent rupture has not been

reported along this trace of the Saddle Hill Fault Zone. As a result, the potential for fault rupture is considered low. Please see the Shannon and Wilson Geotechnical Report for additional detail.

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

Detailed engineering to determine actual quantities of cut and fill is forthcoming and would be available for the construction permits. Grading (cut and fill) is anticipated to remove unsuitable soils and import structural fill, ballast, and gravel for the facility.

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

The site is level, so the chances of erosion are minimal. However, slight erosion during construction is possible and will be minimized by applying best management practices consistent with local and state guidelines.

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

Approximately 35% of the site would be covered with impervious surfaces after construction, including a paved parking area for approximately 20 personal vehicles, a 4000 square foot operations building and the secondary containment area around the tanks that contains an impermeable barrier for separation.

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

A general NPDES permit will be used by Ecology for construction. This permit will require the preparation of a TESC plan, a construction SWPPP, and BMPs to control the risk of erosion. The BMPs include use of mulch, silt barriers, containment systems, interim stormwater controls, cover measures (straw or plastic), and stream bypasses, as well as reseeding of areas temporarily disturbed by construction. In addition, existing vegetation would be preserved to the extent practicable.

Approved planting and seeding would be provided at the conclusion of project construction activities to ensure that all bare earth areas were revegetated to limit the potential for erosion. Landscaping in compliance with City of Hoquiam standards would be installed to control erosion once the facility is functional.

To control the risk of potential liquefaction during seismic events, the storage tanks will be constructed on concrete foundations supported with multiple piles driven approximately 150 feet below the ground surface. Secondary containment measures would be installed in the rail yard, off-loading area, and around the tank farm to centralize any spills or leaks and prevent it from traveling outside the system.

**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.**

Particulate matter will be released to the air in the form of dust from construction site preparation and aggregate handling, as well as fine particulate matter of various sizes (PM<sub>10</sub> and PM<sub>2.5</sub>) from diesel exhaust. In addition emissions of volatile organic compounds (VOC), and products of combustion (including nitrogen oxides [NO<sub>x</sub>], sulfur oxides [SO<sub>x</sub>], carbon monoxide [CO]), and greenhouse gases (including carbon dioxide [CO<sub>2</sub>]) will be emitted during construction and also during operation of the project. The expected emissions during project construction and operations in approximate tons per year are as follows:

Pollutant	Annual Construction Emissions	Annual Operations Emissions
VOC	2.39 tpy	28.55 tpy
PM <sub>10</sub>	1.83 tpy	5.59 tpy
PM <sub>2.5</sub>	1.09 tpy	5.56 tpy
SO <sub>x</sub>	0.005 tpy	8.30 tpy
NO <sub>x</sub>	4.66 tpy	125.9 tpy
CO	2.80 tpy	48.23 tpy
CO <sub>2e</sub>	223 tpy (greenhouse gases measured in carbon dioxide equivalents in metric tons/yr)	16,686 tpy (greenhouse gases measured in carbon dioxide equivalents in metric tons/yr)

The bulk of these operational emissions would result from motor vehicle emissions. As a subset of VOC, hazardous air pollutants (HAP) including benzene, toluene, xylene and formaldehyde are expected to total much less than 1 tpy. Daily emissions estimates are available in the Air Quality Technical Memorandum (HDR 2014). Emissions estimates are based on conceptual design information and are subject to change as plans progress or if the estimation methods need to be revised.

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

There are no known sources of emissions or odor off-site that would affect the project construction or project operational air emissions.

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

- On-site liquid bulk storage tanks will have internal floating roofs which minimize evaporation from the liquid surface. The roofs will be sealed likely by a mechanical shoe seal and a secondary rim-mounted seal. Tank fittings will be gasketed. Generally floating roofs provide 60-99 percent air emissions control as compared to fixed roof tanks that do not contain floating roofs.
- Marine loading vapors will be captured and routed to a vapor combustion unit to control fuel loading emissions. The combustor is expected to use natural gas as needed to supplement combustion or to enrich the loading vapor for combustion. The volatile organic emissions from marine loading will be reduced approximately 99% with this type of air emission control (480 tons down to 5 tons per year). Combustion products will be emitted in the process though (12 tons NO<sub>x</sub>, 29 tons CO, 1 ton PM, and others).
- Fugitive fittings (valves, flanges) will be inspected as required to reduce leakage.
- Spraying water, when necessary, during construction operations to reduce emissions of fugitive dust.
- Covering dirt, gravel, and debris piles as needed to reduce fugitive dust and wind-blown debris.
- Covering open-bodied trucks in accordance with RCW 46.61.655, wetting materials in trucks, or providing adequate freeboard (space from the top of the material to the top of the truck) to reduce fugitive dust emissions.
- Conserving and reusing construction materials on-site to reduce exhaust emissions and traffic delays because additional materials would not need to be delivered to the site.
- Turning off construction equipment when not in use to minimize idling and reduce greenhouse gas emissions.
- Preserve or replant trees that are removed during development as a means of maintaining carbon storage.
- Replanting all vegetation temporarily disturbed by construction activities with native vegetation within 1 year or growing season after construction was complete.

The traffic analysis for the proposed project found no measureable decrease in service level at any affected intersection. Therefore, no incremental idling emissions were estimated for the local train crossings.

### 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.**

There are 8 wetlands and 2 waterbodies on the project site.

Waterbody Name	Size on Project Site (acres)
Wetland B	4.32
Wetland F	0.47
Wetland I	0.24
Wetland K	0.28
Wetland L	0.03
Wetland M	0.34
Wetland WW2 (separate industrial lead track project)	0.16
Wetland WW3 (separate industrial lead track project)	0.10
Waterbody E (excavated pond)	0.23
Grays Harbor	11.03

- 2) **Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

The Project would result in the permanent loss of 0.52 acres of the 5.94 acres of wetlands mapped within the study area. All wetland impacts would be anticipated to occur during the construction phase of the project. The placement of piles for the four additional mooring dolphins in Grays Harbor would result in 0.04 acres of permanent impacts.

Waterbody Name	Permanent Impacts (acres)
Wetland B	0.06
Wetland B	0.37
Wetland M	0.08
Wetland I	0.01
Grays Harbor	0.04

Compensatory mitigation for impacts to aquatic resources from project development will be required by the U.S. Army Corps of Engineers and the Washington State Department of Ecology. Possible compensatory mitigation options could include reconstructing the ditched tidal channel at the northwest corner of the property (Wetland M) and enhancement of the adjacent wetland (Wetland B) to include meanders and other habitat forming features such as large woody debris, pool forming characteristics and native riparian vegetation to improve the tidal channel habitat for use by rearing juvenile salmonids. The removal of old, unused piles from Grays Harbor could potentially serve as mitigation to compensate for the installation of new piles for the mooring dolphins. Potential mitigation for project impacts to aquatic resources are described in detail in the Conceptual Mitigation Memorandum (HDR, 2014).

The industrial lead track to be designed and constructed by the Genesee & Wyoming Railroad could potentially impact portions of Wetland WW2 and WW3 but the details have yet to be determined. Mitigation to offset those impacts would be addressed as part of that separate project.

**3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

The site development footprint was designed to minimize the wetland and surface water disturbance wherever possible. With many of the wetlands located in the northwest corner of the project site where the main line track and the new rail terminal intersect, wetland impact was unavoidable. Approximately 0.52 acres of wetland impact is anticipated.

<b>Project Component</b>	<b>Type of Impact</b>	<b>Wetland Name</b>	<b>Cowardin Class</b>	<b>Wetland Rating a</b>	<b>Permanent Impact (acres)</b>
Rail Terminal	Fill	Wetland B	PEM1	Category III	0.25
Rail Terminal	Fill/Culvert	Wetland B	PEM1	Category III	0.18
Rail Terminal	Fill	Wetland M	E2EM1N	Category II	0.08
Tank Farm	Fill/Culvert	Wetland I	PEM1	Category IV	0.01
<b>Total:</b>					<b>0.52</b>

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

No surface water will be withdrawn. The conceptual mitigation plan proposes the relocation of the Northern Drainage Channel so that it would be crossed by a new, shorter culvert by the new rail yard and off-loading area. Additional detail and graphics of the proposal can be found in the Conceptual Mitigation Memorandum (HDR 2014).

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

Portions of the project site lie within the 100-year floodplain. The project site is classified as Zone C and Zone V2 per FEMA Flood Insurance Rate Maps. Areas classified as Zone V2 are “areas subject to inundation by the 1 percent annual chance flood event with additional hazards due to storm-induced velocity wave action.” Areas classified as Zone C are “areas outside the 1 percent annual chance floodplain, areas of 1 percent annual chance sheet flow flooding where average depths are less than 1 foot, areas of 1 percent annual chance stream flooding where the contributing drainage areas is less than 1 square mile, or areas protected from the 1 percent annual chance flood by levees” (FEMA 1997). The FEMA Flood Insurance Rate Map is for the city of Hoquiam, WA (map panel#5300610005B).

**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 discharge of waste materials to surface waters is expected. No discharge will be generated at the facility other than stormwater runoff. Stormwater from the site will be collected and treated on site.

**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 groundwater will be withdrawn and no water will be discharged to groundwater.



- 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.**

Wastewater would not be discharged into the ground. Sewer services would be provided by the adjacent city of Hoquiam Wastewater Treatment Plant.

**c. Water runoff (including stormwater):**

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

The proposed USD site consists of approximately 25 acres of disturbed area. The site is separated into two separate drainage areas for water quality and flow control, these include the proposed railroad tracks and the proposed parking area and tank facility. The following water quality and flow control features will be constructed for each drainage basin area.

*Railroad tracks*

All stormwater runoff will sheet flow from the center of the tracks to a proposed flat bottom biofiltration swale located at the toe of the proposed site maintenance access road. Stormwater will be treated within the biofiltration swale prior to discharging into a detention pond. The detention pond has been sized utilizing the Western Washington Hydraulic Model to release runoff at or below predeveloped conditions. A control structure will discharge treated runoff from the detention pond into an existing ditch located adjacent to Paulson Road. All runoff will pass through an existing culvert located below Paulson Road and out of the project site.

*Parking area and Tank Facility*

All Stormwater runoff within the proposed parking area and tank facility will be captured within a series of catch basins and conveyed via storm sewer piping to a proposed combined wetpond/detention facility. Prior to discharging into the water quality and flow control facility, the runoff will pass through an oil/water separator located upstream of the facility. The combined wetpond/detention facility will release stormwater runoff back into an existing channel at or below pre-developed conditions. The runoff will be conveyed northerly through existing drainage channels to an existing culvert located below Paulson Road and offsite.

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

Waste materials are not expected to enter groundwater or surface waters because of the secondary containment system requirements for these types of facilities. Containment systems will be installed in the tank farm, rail yard and unloading areas with capacity to contain a spill from the largest tank or rail car, respectively, plus a 6-inch allowance for a storm event. The tank farm storage tanks will be on grade-level or elevated foundations (no below grade tanks or piping), within bermed areas constructed of an impervious material.

A liner will be installed under the secondary containment berm as well as below the entire tank farm to provide a full impervious layer. The liner will consist of a concrete or covered bentonite clay membrane liner designed and approved by a registered State of Washington Geotechnical Engineer. All tanks will be monitored for leaks using electronic leak detection devices. The collection sump will also be monitored continuously by conductivity meters or other devices to determine if product is being collected in the sump.

Rail car loading and unloading will be conducted in bermed, walled, or sloped areas capable of containing the maximum volume of any single compartment of a tank car. In the event of a rail spill, the collection sump(s)

for the rail containment area(s) will be pumped to the tank farm oil/water separator or emptied by tank truck for off-site disposal at an approved facility.

There is an unlikely possibility that minimal amounts of waste materials (i.e., small amounts of petroleum products, sediments, or concrete materials) could occur during construction and operations. Spill prevention BMPs would be followed during construction to avoid such spills. The contractor would be required to prepare a SPCC Plan and the facility itself would have an on-site operational Spill Prevention and Handling Plan prior to beginning operations.

**3) Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:**

The project will be designed to comply with all federal, state, and local regulations, controlling potential risks to water resources through project planning, design, and the application of required BMPs. With these risks controlled, no operational or construction-related adverse impacts on water resources are expected.

- During construction, risks will be controlled through stormwater management BMPs that will be applied for following the requirements of the construction SWPPP. These BMPs may include the use of silt fences, temporary stormwater ponds, or other appropriate methods.
- Construction impacts would be confined to the minimum area necessary to complete the project.
- To the extent practicable, work would be performed during the dry season in wetland areas to limit potential sedimentation effects and interruptions in surface and subsurface flows.
- Exposed soils would be stabilized with a vegetative cover or other erosion control treatment immediately following construction. Landscaping in compliance with City of Hoquiam standards would be installed to control erosion once the facility is functional.
- Temporary disturbed areas by construction activities would be revegetated with native vegetation within one year or one growing season after construction is complete.
- Oil, fuels, or chemicals would not be discharged to surface waters or onto land where there is a potential for reentry into surface waters.
- Developing and implementing BMPs such as a SWPPP that would include a TESC Plan and a SPCC Plan. During operations, the facility will control risks by following the Industrial SWPPP and SPCC to prevent liquid products from the leaving the containment areas. Spill kits will be placed in strategic and easily accessible locations for use if small spills occur. If an uncontained spill should occur, the operator will notify Ecology of the situation as required by law.

Proposed measures to avoid, minimize, and compensate for permanent impacts to wetlands, streams, and groundwater during project operation would include, but would not be limited to the following:

- Stormwater treatment facilities would be constructed to treat and infiltrate stormwater runoff from new and existing impervious surfaces. Stormwater treatment would comply with Ecology’s 2005 Stormwater Management Manual for Western Washington.
- Compensatory mitigation would be provided for direct impacts to wetlands and buffers, consistent with the requirements of Chapter 11.06 of the City of Hoquiam Municipal Code and appropriate federal and state regulations.

**4. Plants**

**a. Check or circle types of vegetation found on the site:**

- \_\_\_\_\_ deciduous tree: alder, maple, aspen, other
- \_\_\_\_\_ evergreen tree: fir, cedar, pine, other
- X   shrubs

- \_\_\_\_\_ grass
- \_\_\_\_\_ pasture
- \_\_\_\_\_ crop or grain
- X   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?**

Following construction of the facility and on-site mitigation, a large portion of the existing vegetation would be removed or altered. Detailed design would be necessary to determine precise amounts.

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

No Endangered Species Act or Washington State listed threatened or endangered plant species have been documented on or near the project site.

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

- e. Landscape design would be included as part of the overall facility design process. A landscape concept and design plans consistent with City of Hoquiam requirements would be prepared by a Washington State licensed landscape architect to meet the Landscaping and Screening ordinance (HMC 10.05.065). The mitigation concept would restore and enhance a large area with wetland vegetation in the northwest corner of the site.

**5. Animals**

**a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:**

**Birds:** (hawk), (heron), (eagle), (songbirds), (other):

Field reconnaissance indicated the presence of great blue heron, Canada goose, mallard, western sandpiper, dunlin, semi-palmated plover, killdeer, Wilson's snipe, bald eagle, red-tailed hawk, osprey, Peregrine falcon, western gull, glaucous-winged gull, Bonaparte's gull, northern flicker, Virginia rail, belted kingfisher, American robin, golden-crowned sparrow, dark-eyed junco, fox sparrow, white-crowned sparrow, black-capped chickadee, bewick's wren, pacific wren, marsh wren, red-winged blackbird, and Eurasian starling in or near the project site.

The Grays Harbor National Wildlife Refuge is located west of Paulson Road and south of SR 109. It is in the northeast corner of the Grays Harbor estuary encompassing approximately 1,500 acres of tidal water, intertidal mudflats, tidal salt and brackish marshes, and upland forest. The Grays Harbor National Wildlife Refuge provides habitat for variety of shorebirds, including, but not limited to, western sandpiper, dunlin, red knot, long-billed dowitcher, and short-billed dowitcher as well as habitat for waterfowl, waterbirds, and raptors.

**Mammals:** (deer), (bear), (elk), (beaver), (other):

Field reconnaissance indicated the presence of black-tailed deer, coyote, raccoons, beavers, and other small mammals on or near the project site.

**Fish:** (bass), (salmon), (trout), (herring), (shellfish), (other): (sturgeon), (smelt), (anchovy), (shad), (and) (sand lance)

Many fish species use Grays Harbor for migration, rearing, and foraging. Federally listed bull trout (generally subadults), green sturgeon (subadult and adult life stages), and eulachon (commonly known as smelt) (larvae

and adult forms) are known to use the harbor for foraging and migration. Pacific salmon that spawn in the rivers and streams of the Chehalis basin all must pass through the nearshore habitats in the Grays Harbor estuary as they migrate to and from the ocean. Estuarine environments are extremely productive, rich habitats, and many life histories of juvenile salmon spend extended periods of time rearing in this environment.

At least seven species of forage fish are known to occur in Grays Harbor: Pacific herring, Pacific sand lance, northern anchovy, surf smelt, longfin smelt, whitebait smelt, and American shad. Surf smelt are the most common species in the lower estuary, while longfin smelt appear to be restricted to the upper reaches of the estuary.

The North Drainage Channel has a direct connection to the tidal channel in the wildlife refuge and provides the only suitable habitat for fish on the property. The other drainages on the property lack depth and flow, and most importantly oxygen levels were too low to support fish. Fish sampling was conducted in the north drainage channel from Paulson Road upstream to a culvert in May 2012 and March 2014. The 2012 sampling effort identified coho salmon, chinook salmon, three-spined stickleback, and sculpin. The 2014 sampling effort identified coho salmon, chum salmon, three-spined stickleback, and sculpin.

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

Common Name	Scientific Name	Status
<b>Birds</b>		
Marbled murrelet	<i>Brachyramphus marmoratus</i>	Federally threatened, WA state threatened
Northern spotted owl	<i>Strix occidentalis caurina</i>	Federally threatened
Western snowy plover	<i>Charadrius alexandrinus nivosus</i>	Federally threatened, WA state endangered
Bald eagle	<i>Haliaeetus leucocephalus</i>	Federal species of concern, WA state sensitive species
Peregrine falcon	<i>Falco peregrinus</i>	Federal species of concern, WA state sensitive species
<b>Fish</b>		
Bull trout	<i>Salvelinus confluentus</i>	Federally threatened, WA state species of concern
Pacific eulachon	<i>Thaleichthys pacificus</i>	Federally threatened
Green sturgeon	<i>Acipenser medirostris</i>	Federally threatened
<b>Insects</b>		
Oregon silverspot butterfly	<i>Speyeria zerene hippolyta</i>	Federally threatened

Federally threatened species identified to potentially occur in Grays Harbor County include bull trout (*Salvelinus confluentus*), marbled murrelet (*Brachyramphus marmoratus*), northern spotted owl (*Strix occidentalis caurina*), Oregon silverspot butterfly (*Speyeria zerene hippolyta*), and Western snowy plover (*Charadrius alexandrinus nivosus*). Critical habitat for bull trout, marbled murrelet, northern spotted owl and western snowy plover is designated in Grays Harbor County. In addition, green sturgeon (*Acipenser medirostris*) and Pacific eulachon (*Thaleichthys pacificus*) are federally listed by the National Marine Fisheries Service.

Many fish species use Grays Harbor for migration, rearing, and foraging. Federally listed bull trout (generally subadults), green sturgeon (subadult and adult life stages), and Pacific eulachon (larvae and adult forms) are known to use Grays Harbor for foraging and migration. No federally threatened fish species are documented to occur in the North Drainage Channel.

No bull trout populations have been identified to ascend or spawn in the tributaries of Grays Harbor; therefore, rearing juvenile bull trout are not present in the North Drainage Channel. In addition, the habitat conditions of the North Drainage Channel are not optimal for spawning bull trout. Green sturgeon may migrate past the Terminal and therefore their potential presence in the vicinity of Terminal 3 cannot be discounted. Green sturgeons are not documented to occur in the North Drainage Channel. This is likely due to the low salinity of the stream, the lack of preferred prey items, and the distance of the project site from the outer harbor. It is unlikely to find eulachon in small streams as they typically utilize the lower reaches of large rivers and estuaries to spawn. In addition, eulachon are unlikely to inhabit the North Drainage Channel due to the poor habitat quality and presence of fine substrate material which is not conducive to spawning activities and high salinity.

Due to the industrial nature of the site and lack of suitable habitat, other federally threatened species such as the marbled murrelet, northern spotted owl, Oregon silverspot butterfly and western snowy plover and Washington state sensitive species such as the bald eagle and peregrine falcon are not documented or expected to occur within the project site. Critical habitat for marbled murrelet, northern spotted owl and western snowy plover is not present in the project site.

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

Grays Harbor National Wildlife Refuge is adjacent to the project site. Shorebirds migrate to the Grays Harbor estuary from late April through early May as they migrate north for breeding. As many as 24 species of shorebirds use Grays Harbor Refuge, with the most abundant species being western sandpiper and dunlin. Semi-palmated plover, least sandpiper, red knot, and black-bellied plover are also common during migration. The refuge is also used by peregrine falcon, bald eagle, northern harrier, Caspian tern, great blue heron, songbirds, and a variety of waterfowl.

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

- e. The project would significantly improve the water quality of stormwater runoff from the project site to Grays Harbor. The site currently has no stormwater management features and the majority of stormwater is discharged directly towards the wildlife sanctuary. The new stormwater management would include detention and water quality biofiltration swales to clean the water prior to discharge off-site.

The development of the on-site mitigation area would provide additional habitat for fish and wildlife visiting the site. Relocating the North Drainage Channel to the south allows for a shorter culvert crossing under the rail at the north end of the site and allow for better fish passage.

The Grays Harbor Rail Terminal would develop and maintain an approved facility Spill Prevention and Response Plan which details the chain of command, communication protocols, and response provisions for all types and sizes of discharges. This document would be reviewed and approved at the federal and state level for compliance and reduce the potential for adverse effects due to potential oil spills. The Grays Harbor Rail Terminal would contract with an emergency response company to ensure the most current technology and best management practices are used in the handling of wildlife in case of a spill event. In the event of a spill and oiled wildlife is observed, sightings should be reported to Washington Emergency Management Division and protocol identified in the Northwest Wildlife Response Plan (NWACP Section 9310) would be followed.

**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.**

Electricity would be provided to the project site from Grays Harbor Public Utility District #3. Electricity would be used to power lighting, rail and vessel loading equipment, and unloading pumps. The project will include a vapor control unit utilizing natural gas from Cascade Natural Gas. The vapor control unit will only consume natural gas during vessel loading activities.

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

The project will not shade adjacent properties or affect potential use of solar energy on adjacent properties.

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

The Grays Harbor Rail terminal will utilize current state of the art approved technology and equipment to be the most proficient to ensure proficient operations.

## **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:**

The following potential environmental health hazards are addressed through the extensive regulatory and mitigation measures discussed in Section B(7)(a)(2) below.

(1) Spills.

- *During Facilities Construction.* As with the construction of all major facilities, there is a low risk of fuel spill or leakage from heavy equipment used during construction.
- *During Operations.* Unless proper operational controls are in place, there is a potential risk that liquid fuels will leak or spill during any one of the following on-site transfer points: (1) as liquids are offloaded from on-site rail cars to storage tanks; (2) when liquids are stored in the storage tanks; (3) as liquids are transferred from the tanks to marine vessels via pipeline; and (4) as outbound vessels move through Grays Harbor.

(2) Fire. The project involves the storage and transfer of flammable liquids and therefore strict controls are required to avoid any fire hazards in and around the storage tanks or the transfer terminal.

(3) Rail Safety. There are two primary components to proposed rail service to the Grays Harbor Rail Terminal – operations conducted by the short line service provider, and rail operations within the footprint of the proposed facility. Safety and regulatory measures in place minimize potential for collisions or derailments as a train moves from Blakeslee Junction in Centralia to the entrance of Grays Harbor Rail Terminal, and when rail cars are moved within the Grays Harbor Rail Terminal site.

### **1) Describe special emergency services that might be required.**

With the fire suppression features incorporated on-site and on the wharf, no special emergency fire services are anticipated. The Grays Harbor Rail Terminal will have access to C.U.R.A. Emergency Services, a nationally-recognized emergency response firm. Additional information about how C.U.R.A. will provide a comprehensive program for responding to any emergency such as fires or spills can be found later in this section.

### **2) Proposed measures to reduce or control environmental health hazards, if any:**

Over the past decade, the Grays Harbor Rail Terminal's parent company USD has developed more than a dozen bulk liquids rail transfer facilities across North America. The company has an excellent safety record and a proven commitment to investing in the necessary technology, resources, and expertise to ensure safe, secure, and environmentally-responsible operations. In addition, the proposed facility design and operation will be highly regulated at the federal, state, and local levels. This regulatory framework, when coupled with the safe operating and response procedures proven effective multiple USD facilities, mitigates potential environmental

hazard at the facility.

Each USD facility utilizes an Integrated Contingency and Response Plan (ICRP) which encompasses all operational, safety, and environmental response procedures including spill prevention and control, fire suppression, facility security, and stormwater management. For each facility, USD develops site-specific Spill Prevention, Countermeasure, and Control (SPCC) plans, a primary component of the ICRP. The SPCC Plan will be developed as part of the engineering and design phase, in consultation with regulatory agencies and area first responders and in accordance with the spill prevention requirements set forth in 40 CFR § 112.8 as well as state regulations.

The Grays Harbor Rail Terminal will be engineered to the International Building Code and seismic design requirements specific to Grays Harbor, and the site-specific soil conditions identified in our subsurface explorations. The draft geotechnical report identified seismic conditions; this data will be used to support facility design and engineering. The above-ground storage tanks will be constructed in accordance with the Uniform Building Codes and API Standards for a seismic risk zone 3 as identified for western Washington. Each tank will be constructed on top of approximately 150-200 piles for support during a seismic event. In addition, we will work closely with the Geologic Hazards Group of the Washington State Department of Natural Resources (DNR) to ensure that ongoing research into tsunami-resistant design is incorporated into facility construction when practical.

Like all operations which occur at a port, the Grays Harbor Rail Terminal operations could pose some risk to the environment. Details about how the facility will mitigate or eliminate environmental risks which could result from facility construction and operations are below.

#### *Spills – Prevention and Response*

The facility will employ multiple, redundant spill prevention and response systems to avoid spills and to minimize impacts in the unlikely event that any type of spill occurs. These systems will include:

- *During construction.* Standard measures to prevent spills or leaks from heavy equipment will be used during construction of the facility. Refueling and maintenance of construction equipment and vehicles will be done as far away from wetlands and streams as possible. Implementation and routine inspection of temporary erosion and sedimentation control (TESC) plans, as reviewed and approved by the City during the building permit process, will be performed to prevent soil escapement off-site. These measures will be installed and maintained during construction in compliance with federal requirements associated with the Clean Water Act and 40 CFR 123.25 and 122.26 as well as the Washington State Department of Ecology's (Ecology) NPDES requirements associated with the Revised Code of Washington (RCW 90.48) and Washington Administrative Code (WAC 173-200, 201A and 204).
- *During off-loading from railcars to storage tanks:* Facility design for the off-loading process will include secondary containment and safety systems for the off-loading process, such as dry-break disconnect valves, emergency shut-down systems, pump controls, and drip pans placed under each off-loading position. A containment system will be placed at the off-loading rack. These mechanical features and containment measures significantly reduce the likelihood of environmental impact during the off-loading process, and, per Ecology regulations, will be able to contain the volume of one full tank car (plus six inches of freeboard) in the unlikely event of a spill or leak of material.

All piping and connections will be constructed, operated, and maintained in accordance with the spill prevention requirements set forth in 40 CFR § 112.8 and 49 CFR § 130, as well as the Piping Inspector Program described in American Petroleum Institute Standard 570. All transfer operations are attended by multiple trained personnel to prevent any discharge during transfers.

- *During storage:* Liquid bulk materials will be stored in approximately 6-8 above-ground storage tanks. The tanks will be constructed in accordance with American Petroleum Institute (API) Standard 650 for

welded steel tanks for oil storage. The tanks will feature automated alarms and shutdowns that prevent overfilling of the tanks ensuring safe storage of the liquid material. The tanks will be located in an impervious containment area surrounded by elevated containment structures such as concrete walls or earth berms. This containment system will be designed to contain 110% of the volume of the largest tank within the storage area. These tanks and all associated pumps, valves, manifolds, and other related components are tested for leaks prior to being placed into service as well as on a recurring maintenance schedule in compliance with 40 CFR § 112.8 and API Standards 653 (Above Ground Storage Tank Inspector Program) and 570 (Piping Inspector Program). They are subject to periodic regular maintenance to assure their safe and compliant operation.

Highly-skilled and trained facility personnel are a primary component in spill prevention. All staff members onsite will receive ongoing training in the SPCC Plan developed for the Grays Harbor Rail Terminal to ensure those responsible for monitoring equipment are both trained and empowered to act quickly if there are indications of leakage or equipment not functioning properly. The implementation of these measures at other USD facilities has resulted in an exemplary safety record, with no recordable spills of liquid bulk materials during storage.

- *During transfer to marine vessel.* Transfer of materials for transport via marine vessel is regulated by the US Coast Guard (USCG), the US Environmental Protection Agency (EPA), and the Washington State Department of Ecology (Ecology). Transfer of oil will be completed by properly trained personnel and in compliance with the state and federal oil handling standards set forth in WAC 173-180 and 33 CFR § 154 and § 156. Loading equipment will be constructed, inspected, and maintained in accordance with the requirements of ANSI B31.1. Loading equipment will include quick connect couplers and redundant shutoff valve arrangements to facilitate quick connection with the tankers and prevent any discharge during transfer operations. Loading equipment will also include a safety release mechanism that allows for instantaneous disconnection from the vessel in the event of an emergency without discharging any material. Additional mooring dolphins will be constructed adjacent to the existing concrete wharf to provide appropriate mooring support of vessels during loading transfer operations in compliance with 33 CFR 156. Prevention and response measures will be detailed in the SPCC Plan, which will be developed as part of the preparation of the engineering and design phase, in consultation with regulatory agencies and area first responders and in accordance with the spill prevention requirements set forth in 40 CFR § 112.8.
- *During marine vessel operations.* Marine vessel safety is governed by strict federal oversight from the USCG and the International Maritime Organization and is also regulated at the state and local levels both by state agencies such as Ecology and the Grays Harbor Safety Committee. Statutes governing oversight of marine vessel safe operations can be found in the International Convention for the Safety of Life at Sea, Convention on the International Regulations for Preventing Collisions at Sea, and the International Convention on Standards of Training. In 1992, it was required that all new 5,000 dwt and larger tankers ordered after July 1993 to be fitted with double-hulls. In 2003, the regulations for phasing out single-hulled tankers were made stricter; Class 1 tankers were to be phased out by 2005 and Classes 2 and 3, by 2010. These robust regulatory oversight mechanisms, in tandem with the spill-prevention and response measures result in a low risk of environmental hazard and provide specific mitigation measures.
- *Response measures.* As mentioned earlier in this document, USD develops SPCC plans that are specific to the geography and operations of each site, and are developed and implemented with oversight from regulatory agencies and in consultation with area first responders.

Transfer of hazardous materials over water is highly regulated with oversight provided by multiple federal, state, and local agencies. These agencies include the USCG and the Ecology. The Grays Harbor Rail Terminal will work with these regulators to facilitate regular onsite training drills for staff and other first responders. In addition, the Grays Harbor Rail Terminal is a member of the Grays Harbor Safety Committee, the body charged with developing Standards of Care governing safe marine vessel navigation and emergency response.



If a spill occurs during over-water transfers of product, the ICRP will be followed, which will limit impacts and provide for adequate analysis and mitigation of potential adverse impacts. Ecology and the USCG will be notified to oversee and assist with containment. Control of spills from vessel operation is largely controlled by the USCG. Response to spills in Washington is coordinated by the Ecology Spill Prevention, Preparedness and Response Program.

The Grays Harbor Geographic Response Plan (GRP) has specific guidance for spills in the GH2 strategy area which includes use of booms, plywood mats, airboats and boom anchor locations. The GRP and its recommendations would be referenced by first responders in case of a spill.

In addition to the significant federal, state, and local resources available for spill response, the Grays Harbor Rail Terminal contracts with C.U.R.A. Emergency Services, a nationally-recognized emergency response firm, to provide a comprehensive program for responding to any emergency such as fires, spills, or other incidents requiring such a coordinated response. In the unlikely event of a major emergency, C.U.R.A. would coordinate all local, state and federal responses.

The ICRP will incorporate all emergency response plans for the facility (including the above-referenced SPCC, stormwater, and facility security plans). Once completed, all plans will be provided to C.U.R.A. so that they are aware of the emergency response protocols specific to the site and can act on the Grays Harbor Rail Terminal's behalf when necessary.

#### *Fire – Prevention and Response*

The International Fire Code (IFC), the American Petroleum Institute (API 2003), and National Fire Protection Association (NFPA 30) establish construction codes and provide engineering requirements necessary to ensure onsite structures are built to prevent and reduce risk of fire. These include, but are not limited to, proper grounding and insulating of tanks and electrical systems, allowable distances between tanks, and proper water and foam fire suppression systems. Plans are reviewed for fire code compliance by the City during building permit review. These standards ensure risk of fire at the site is accurately assessed and appropriate measures are incorporated into the design and construction of all facilities on site. Material will only be transferred utilizing controlled or closed systems which further reduce the risk of exposure. Onsite fire suppression, spill prevention measures which limit the risk of materials occurring outside of the closed transfer systems, and additional site-specific fire safety components are detailed below.

- *Overall design.* Design elements intended to prevent the ignition and spread of fire, such as maximizing building setbacks for fuel storage, on-site fire protection, and installing collection vents and flame arrestors on tanks, will be incorporated into site development.
- *Training.* The Grays Harbor Rail Terminal staff will hold annual emergency preparedness and response trainings both internally and with local first responders to maximize resource skills and preparation. Additional drills or trainings will be held as warranted to ensure that all personnel involved in emergency response have current information about operational, health and safety, security, or other on-site procedures. Fire-suppression equipment will be pre-positioned onsite and all personnel will be trained in its use.
- *Tank design.* Tanks will be constructed in accordance with NFPA 30 which includes spacing requirements between tanks (as determined by the diameter of the tanks). Tanks will also be equipped with other measures such as over-pressure protection, high-level alarms, floating roofs, onsite fire protection, and emergency overflows into the containment area. Per Ecology regulations, the secondary containment will provide volume for one full tank plus six inches of freeboard (for containment during rain events) in the unlikely event of a spill or leak of material. The tanks would be inspected and repaired in accordance with American Petroleum Institute guidelines.
- *Off-loading procedures.* Rail car unloading will only be conducted in contained areas. The pipelines to the terminal would be of welded steel, constructed per ASME B31 Code for Pressure Piping, and

tested per applicable regulations. Unloading operations will be continuously staffed during all transfer operations. The unloading operations will be in compliance with the U.S. Oil Pollution Control Act and in conformance with the approved SPCC Plan approved by a Registered Professional Engineer.

- *Additional first-response resources.* In addition to the significant federal, state, and local resources available for fire suppression and response, the Grays Harbor Rail Terminal contracts with C.U.R.A. Emergency Services, a nationally-recognized emergency response firm, to provide a comprehensive program for responding to any emergency such as fires, spills, or other incidents requiring such a coordinated response. In the unlikely event of a major emergency, C.U.R.A. would coordinate all local, state and federal responses.

### *Rail Safety*

There are two primary components to proposed rail service to the Grays Harbor Rail Terminal – operations conducted by Genesee & Wyoming (the short line service provider) and rail yard operations within the footprint of the proposed facility. As detailed below, rail operations are highly regulated by multiple agencies to reduce environmental and safety risk.

- *Genesee & Wyoming operations.* All US railroad operators adhere to strict guidelines in the following areas to ensure rail safety:
  - Rail operators are regulated by the Federal Railroad Administration, Pipeline and Hazardous Materials Safety Administration, Transportation Security Administration, and the National Safety Transportation Board.
  - The transport of oil is highly regulated by the agencies listed above as well as by 49 CFR 130 (Oil Spill and Response Plans). Recent emergency rule changes from the Federal Railroad Administration have included reduced maximum speeds near populated areas, stricter placard requirements for the commodity, loading and unloading requirements, and safety and security measures. Regulations governing transport also address specifications, including emergency response, and regulations regarding the design of railroad tank cars, which must be taken by railroads.
  - The Association of American Railroads (AAR) governs design and construction standards for rail cars, and has established standards which exceed the federal standards noted above. The AAR committee charged with design and construction standards includes representatives from USDOT, fleet owners, railroads, and the National Transportation Safety Board.
  - Operators are required to secure hazardous materials during transport and each must have a USDOT-approved security plan in place to assure that materials are safe from tampering during transport. These approved safety plans must include incident reporting requirements, preventative measures, hazardous materials containment, employee training, and railcar handling.
  - The National Response Center, the State Emergency Management Division, and the appropriate regional office of Ecology are to be immediately contacted in the event of an accident on the rail line. In the event of a release, Genesee and Wyoming must immediately notify their dispatching center and local supervisory personnel. The Emergency Response Guidebook outlines the appropriate response procedures specific to the material released. These strict response protocols reduce risks to operators, communities, and the natural environment.
- *Facility yard track rail operations.* As noted above, rail speeds within the facility will not exceed five mph. USD utilizes a proven third-party operator to provide rail services within the footprint of all bulk liquids facilities. This operator has developed a thorough system of rules and regulations which dictate how rail cars are handled at all of the bulk liquids facilities they operate, and that overall system will have additional protocols developed that are specific to the operations of the Grays Harbor

Rail Terminal. The slow speed and strict operational training, procedures, and rules are meant to mitigate environmental hazard from facility yard track rail operations.

In addition, the Grays Harbor Rail Terminal will have a USDOT and USCG-compliant, site-specific security plan which addresses how and when access to the facility will be granted, how facilities are secured at all times, and how these security protocols are coordinated with the operations and security procedures of Genesee & Wyoming.

## **8. Land and shoreline use**

### **a. What is the current use of the site and adjacent properties?**

The project site is currently vacant. The Grays Harbor National Wildlife Refuge is west of the project site across Paulson Road. Willis Enterprises, an existing log storage, wood processing and chipping plant operates immediately southeast of the project site. There are undeveloped hills to the north and northwest of the project site. West of the project site is the city of Hoquiam Wastewater Treatment Plant and the Bowerman Basin Wildlife Refuge managed by the US Fish and Wildlife Service.

### **b. Has the site been used for agriculture? If so, describe.**

The site has not been used for agriculture.

### **c. Describe any structures on the site.**

There are no existing structures on the project site. There are four vacant buildings immediately south of the project site but are not included in the Grays Harbor Rail Terminal lease agreement with the Port of Grays Harbor. The buildings include an approximately 7,500 square-foot garage with three bay doors and a mezzanine-level office (Garage A), an approximately 2,600 square-foot one-story garage with one bay door (Garage B) connected to an approximately 4,300 square-foot one-story garage with three bay doors (Garage C), and an approximately 400 square-foot scale house. A concrete truck scale was associated with the scale house.

### **Will any structures be demolished? If so, what?**

No structures are to be demolished at this time.

### **d. What is the current zoning classification of the site?**

The current zoning classification by the City of Hoquiam is Industrial.

### **e. What is the current comprehensive plan designation of the site?**

The 2009 City of Hoquiam Comprehensive Land Use Plan designates the project site as an Industrial District.

### **f. If applicable, what is the current shoreline master program designation of the site?**

The project site Shoreline Designation is - Urban (Chehalis River).

### **g. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify.**

The City of Hoquiam regulates activities in critical areas and applicable buffers under its Municipal Code (Hoquiam Municipal Code [HMC] Title 11). In addition to the wetland regulations, the City of Hoquiam identifies Fish and Wildlife Habitat Conservation Areas (FWHCAs), which include areas where endangered, threatened, and sensitive species have a primary association; waters of the State; State natural area preserves and natural conservation areas; and streams and rivers planted with game fish by a governmental agency

(HMC 11.06.230). The City also considers environmentally sensitive areas as those lying within the FEMA mapped 100-year floodplain and geologic hazard areas. The Critical Area Report (HDR 2014) prepared for the project details each sensitive area, the impacts and the required buffers.

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

Approximately 30-40 employees would maintain operations at the facility after start up. Additional jobs will be created, including operations on the wharf which will be handled by the local ILWU and the contracting for tug and piloting services. No employees will reside at the completed facility.

**i. Approximately how many people would the completed project displace?**

There are no residents or businesses that would be displaced by the project.

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

No measures are necessary. The site design for the facility was developed to accommodate the maintenance of operations for the existing log processing facility as well as minimize impacts to the environmentally sensitive areas on the property.

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

The zoning is industrial and the Grays Harbor Rail Terminal is a permitted use within that zone.

**9. Housing**

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

No housing units would be required for the 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 due to the project.

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

No measures are proposed.

**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?**

The vapor control unit and the storage tanks would be the tallest structures at up to 50 feet tall. The principal exterior material for most of the structures proposed would be steel and painted white.

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

The proposed project would be most visible to viewers from the hills to the north and from Grays Harbor to the south of the project site. From both locations, the proposed project would be consistent with other development in the area and would not substantially alter the existing views. Viewers would likely be sensitive to changes in the landscape; however, the number of potential viewers from the hills would be

minimal due to the undeveloped nature of the area. From the south, most viewers would view the project site from boats and thus, would experience the view only temporarily. Additionally, the project would be consistent with other development along the coast; therefore, viewers would not experience markedly different views from current conditions. Refer to the Visual Quality Technical Memorandum (HDR 2014) for additional information.

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

No measures are proposed.

## **11. Light and glare**

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

Lighting of the project site would be required between the hours of dusk and dawn for safety and security, which will slightly raise ambient light levels in the area. The lights will be directed downward and shielded to illuminate work areas and not directed towards populated areas or the adjacent wildlife refuge. No features of the proposal would be produce reflective glare.

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

The facility is a developed industrial area and would be consistent with those activities in the area. Light from the operation of the facility would not be expected to be a safety hazard or interfere with existing views.

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

There are no known off-site sources of light or glare that would affect the proposal.

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

No measures are proposed.

## **12. Recreation**

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

The Grays Harbor National Wildlife Refuge is west and adjacent to the project site. It provides hiking and bird-watching opportunities. Grays Harbor provides informal recreational opportunities for boaters on the water. The John Gable Community Park is located across State Route 109 from the project site as are the Hoquiam Senior High, Middle, and Elementary schools.

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

The proposed project will not displace or restrict access to any recreational uses.

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

No measures are proposed.

## **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.**

Review of the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database (accessed March 17 and June 7, 2013) has indicated that with the exception of a 1975 pedestrian survey, the APE has not been previously surveyed for cultural resources, and that no archaeological sites, historic sites, cemeteries, or historic properties listed on the National Register of Historic Places (NRHP) have been previously recorded in the APE. The background review determined the Area of Potential Effect (APE) to be located in an area of moderate probability for historic properties.

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

Review of the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database did not indicate any landmarks or evidence of historic, archaeological, scientific, or cultural importance within one mile of the project site.

- Historic maps indicate the project site has been subject to broad-scale fill events. Previous environmental and archaeological studies conducted within a 1.6-km (1-mile) radius of the APE have confirmed that at least 3.0 m (10.0 feet) and up to 6.4 m (21.0 feet) of fill have been deposited on the man-made waterfront landform. The authors could not locate any information that fill events prior to 1978 included surface preparation; however, modern landscape modification likely included grading and filling prior to the addition of geotextile and compacted fill.
- If intact precontact or early historic cultural resources were to be present in the APE, they would be expected to be located beneath the fill deposits. Descriptions of the successive episodes of fill indicate that all fill placements may not have included grading and filling at natural (premodern) surfaces. Dredge spoils, capped by logging waste and overlain with geotextile fabric and quarry spall, however inadvertently, may have served as a protective “blanket” over undisturbed archaeological deposits.
- Disturbed and/or re-deposited historic materials may be present within the fill, but would lack context and integrity.
- Types of cultural resources that may be encountered in the APE could include shell midden, wooden stakes, weirs, nets, traps, and/or other organic and inorganic shaped tools that could represent a range of fishing activities. Additionally, historic trash scatters, structural remains, and/or pilings may be present that would be associated with the local area history of logging, residential occupation, and/or transportation activities.
- Archived historic maps do not represent the APE with fine enough detail to determine whether or how much of the northernmost portion of the property would have consisted of remnant natural terrace.
- Ethnographic records indicate that “traditional burials were above ground in boxes or canoes. Some burials were in sandstone bluffs or in canoes buried in sand dunes.
- Michael Luark noted in his diary in 1855 that a grove of tideland spruce was used as a burial ground” (Onat et al. 2007:22).
- Although the historic railroad and modern road construction have dramatically affected the landscape in this area, regional archaeological research has identified terrace landforms near estuaries and wetlands as likely locations for human burials. Historic-era landscape modification may have served to protect, rather than destroy, evidence of patterned human behavior in the precontact era.

Field investigations of the project site were conducted on April 2, 4, and 15, 2013, and January 22 and 23, 2014. Refer to the Cultural Resources Report (Tierra, 2014) for additional detail.

Based on the results of the database review and field investigations, there is no archaeological or ethnohistoric evidence to indicate that ground-disturbing activities within the upper layers of fill would encounter disturbed

or re-worked cultural material. There is some regional archaeological evidence that indicates that ground-disturbing activity below the fill layer at the extreme northern edge of the APE may have a moderate potential to encounter evidence of human burials. Given ethnohistoric and archaeological evidence in the Grays Harbor area of extensive use of elaborate fish trap systems, there is a moderate likelihood that ground-disturbing activities below the dredge spoils and the geotextile fabrics approximately 6 feet below the surface may encounter evidence of precontact fishing activities. There is also a moderate possibility that cultural materials may have been included with dredge spoils and thereby re-deposited on site.

None of the existing structures on the project site (wharf, associated wharf structures, and the on-site buildings) meet the minimum age requirement to be considered eligible for the NRHP, and none of the structures are distinguished in any way.

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

- All ground-disturbing activities that take place below the fill layers would be conducted in the presence of an archaeological monitor until it can be determined that activities are unlikely to disturb archaeological deposits. It is recommended that the depth of fill layers across the site be defined as 1.2–1.8 m (4.0–6.0 feet) deep for the purposes of this caution, unless additional testing or the results of archaeological monitoring provides additional clarification.
- Given that fish traps, if present under the fill, would present as slim vertical elements, excavation for project elements such as the stormwater pond should be opened as horizontal lifts, once it becomes apparent that excavation nears the interface of the fill and natural surfaces, and that these activities should be conducted in the presence of an archaeological monitor until it can be determined that ground disturbance is unlikely to encounter archaeological deposits.
- In the event that archaeological materials are encountered during the development of the property, an archaeologist would immediately be notified and work halted in the vicinity of the find until the materials can be inspected and assessed. At that time, the appropriate persons are to be notified of the exact nature and extent of the resource so that measures can be taken to secure them. In the event of inadvertently discovered human remains or indeterminate bones, pursuant to RCW 68.50.645, all work must stop immediately and law enforcement should be contacted.

**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 project site is accessed by Paulson Road to the west and Airport Way to the south. State Route 109 is to the north of the project site and provides the main east to west access through the city of Hoquiam. State Route 109 connects to U.S. Highway 101, which runs north to the Olympic Peninsula and south to Astoria, Oregon.

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

Grays Harbor Transit has regularly scheduled buses that operate along State Route 109. The closest stop is approximately ½ mile to the northeast of the project site at the intersection of State Route 109 and Blaine Street.

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

The City of Hoquiam Off-Street Parking ordinance (HMC 10.05.100) requires that off-street parking be provided for the employees needed for the project. This project would provide a new, paved parking lot to accommodate 20-30 parking spaces. A parking plan would be submitted for approval with HMC 10.05.100, which would detail the plan to provide off-street parking for the project. No parking spaces would be eliminated as a result of the project.

- 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).**

The project would not require new roads or streets or improvements to existing roads or streets.

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

The project would require use of rail and water transportation. No air transportation out of nearby Bowerman Airport would be anticipated.

Product would be delivered from the east by rail by the Burlington Northern Santa Fe (BNSF) Railway or the Union Pacific (UP) Railroad. Rail connections to Grays Harbor are provided by the Genesee & Wyoming Railroad who owns and operates the rail line from the major rail transfer facility Centralia, WA.

Terminal 3 is a deep water port capable of mooring Panamax class vessels with carrying capacity up to 350,000 barrels. It is anticipated the facility would operate on a schedule to handle an average of 3-5 vessel calls per month.

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

Rail delivery is projected to be up to one unit train every 2 days.

Projections for transshipment include up to 5 vessels per month. Up to 60 outbound vessels and barges per year are projected.

Employee trips from 30 employees regularly employed on site are projected to be 20 to 30 per day.

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

A detailed Rail Impact Transportation Analysis (RITA) and a Vessel Impact Transportation Analysis (VITA) is in process and the results will be provided as soon as they are available.

Although the industrial lead track would be designed and constructed by the Genesee & Wyoming Railroad, the Grays Harbor Rail Terminal should encourage the addition of advance warning crossing gates and a pre-signal at the new crossing with Paulson Road should be designed to ensure enough time to clear vehicles at the intersection of Paulson Road with SR 109 as recommended in the Traffic Memorandum (HDR, 2014).

Demands for rail service will be met by the Genesee & Wyoming Railroad and regional rail systems. Marine transportation infrastructure is in place to serve additional vessels accessing Grays Harbor by the Port Authority.

## **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.**

The project is not anticipated to result in an increased need for public services.

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

No measures are proposed at this time.



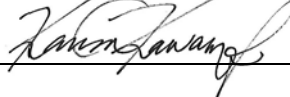
**16. Utilities**

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

The utilities proposed for this project require working with existing service companies. Electricity required for the project will come from the Grays Harbor PUD and will require modification of onsite infrastructure for delivery to the site. Natural gas will come from Cascade Natural Gas and will require modification of onsite infrastructure for delivery to the site. Water and sanitary sewer service would be provided by the City of Hoquiam.

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: 

Date Submitted: 4/7/2014