PORT OF ILWACO Marine Structures Replacement Ilwaco, WA

Appendix A7

WDFW HPA Permit No. 2024-6-66+01



State of Washington Department of Fish and Wildlife

Mailing Address: PO Box 43234, Olympia, WA 98504-3234, (360) 902-2200, TDD (360) 902-2207 Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

March 22, 2024

Moffatt & Nichol Victoria England 600 University St Seattle, WA 98101-4117

Dear Victoria England:

SUBJECT: YOUR APPLICATION FOR PORT OF ILWACO EAST BULKHEAD RESILIENCE PROJECT, WDFW APPLICATION ID: 32313

On January 10, 2024, the Washington Department of Fish and Wildlife (WDFW) first received your application materials for a Hydraulic Project Approval (HPA) for the project referenced above.

Your request for a minor modification of your existing HPA has been approved. You are authorized to conduct work through February 28th, 2025.

The new work window for each calendar year will be July 15th to February 28th. No other changes to this HPA are authorized through this letter.

Please attach this letter to your HPA on-site.

For additional guidance and information about the HPA application process, please visit WDFW's HPA website at https://wdfw.wa.gov/licenses/environmental/hpa.

If you have any questions, please call me at 360-480-2558.

lawren Baueruschmuth

Sincerely,

Lauren Bauernschmidt

Habitat Biologist



Washington Department of Fish & Wildlife PO Box 43234 Olympia, WA 98504-3234

(360) 902-2200

Permit Number: 2024-6-66+01 Issued Date: February 22, 2024 Project End Date: February 15, 2027 FPA/Public Notice Number: N/A

Application ID: 32313

PERMITTEE	AUTHORIZED AGENT OR CONTRACTOR		
Port of Ilwaco	Moffatt & Nichol		
ATTENTION: Tracy Lofstrom	ATTENTION: Victoria England		
PO Box 307	600 University St		
Ilwaco, WA 98624	Seattle, WA 98101-4117		

Project Name: Port of Ilwaco East Bulkhead Resilience Project

Project Description: The proposed Port of Ilwaco East Bulkhead Resilience Project (herein referred to as the 'Project') would consist of three primary elements;

- 1. Replacing the failing east bulkhead with an anchored steel sheetpile bulkhead (Preferred Alternative)
- 2. Repairing slope protection north and south of the bulkhead an raising top of slope at the head of the slip approximately 1.5 feet to accommodate future sea level rise resilience.
- 3. Paving and regrading the upland wharf area (access driveway) directly landward of the bulkhead to mitigate the effects of sea level rise.

As part of the above elements, creosote-treated timber that configures the external wall of the existing bulkhead and retaining wall will be removed along with select derelict creosote-treated piles next to the bulkhead. Additional derelict creosote piles and cross members will be removed from the slip adjacent to the bulkhead as mitigation for Project impacts resulting from drainage rock fill placement between the existing bulkhead and the new bulkhead necessary to maintain water pressure equilibrium on both sides of the bulkhead. The removal of creosote from the marine environment will also mitigate for impacts associated with the riprap shoreline protection that is proposed to replace the derelict creosote treated timber revetment/retaining wall and associated elements. A fish mix gravel layer will be placed between HTL and the toe of the riprap on the surface of the rip rap slope protection at the head of the slip to provide beach nourishment and habitat improvements for fish passing through the marina as mitigation for Project impacts. Additionally, an approximately 2,510 sf area of derelict timber floats floating timber debris will be removed from the south portion of the marina as mitigation for Project impacts.

PROVISIONS

AUTHORIZED WORK TIMES

- 1. TIMING LIMITATION: To protect fish and shellfish habitats at the job site, work below the ordinary high water line must occur from July 1st and February 15th of any year.
- 2. APPROVED PLANS: Work must be accomplished per plans and specifications submitted with the application and approved by the Washington Department of Fish and Wildlife, entitled "rev2024Jan_213282 ILWACO-BH_JARPA figs REV3 VRE.pdf" and uploaded on January 10th, 2024, except as modified by this Hydraulic Project Approval (HPA). You must have a copy of these plans and this HPA available on site during all phases of the project construction.



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(360) 902-2200

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NOTIFICATION

- 3. PRE- AND POST-CONSTRUCTION NOTIFICATION: You, your agent, or contractor must contact the Washington Department of Fish and Wildlife by e-mail at HPAapplications@dfw.wa.gov; mail to Post Office Box 43234, Olympia, Washington 98504-3234; or fax to (360) 902-2946 at least three business days before starting work, and again within seven days after completing the work. The notification must include the permittee's name, project location, starting date for work or date the work was completed, and the permit number. The Washington Department of Fish and Wildlife may conduct inspections during and after construction; however, the Washington Department of Fish and Wildlife will notify you or your agent before conducting the inspection.
- 4. PHOTOGRAPHS: You, your agent, or contractor must take photographs of the job site before the work begins and after the work is completed. You must upload the photographs to the post-permit requirement page in the Aquatic Protection Permitting System (APPS) or mail them to Washington Department of Fish and Wildlife at Post Office Box 43234, Olympia, Washington 98504-3234 within 30-days after the work is completed.
- 5. FISH KILL/ WATER QUALITY PROBLEM NOTIFICATION: If a fish kill occurs or fish are observed in distress at the job site, immediately stop all activities causing harm. Immediately notify the Washington Department of Fish and Wildlife of the problem. If the likely cause of the fish kill or fish distress is related to water quality, also notify the Washington Military Department Emergency Management Division at 1-800-258-5990. Activities related to the fish kill or fish distress must not resume until the Washington Department of Fish and Wildlife gives approval. The Washington Department of Fish and Wildlife may require additional measures to mitigate impacts.

STAGING, JOB SITE ACCESS AND EQUIPMENT

- 6. Establish the staging area (used for activities such as equipment storage, vehicle storage, fueling, servicing, and hazardous material storage) in a location and manner that will prevent contaminants like petroleum products, hydraulic fluid, fresh concrete, sediments, sediment-laden water, chemicals, or any other toxic or harmful materials from entering waters of the state.
- 7. Check equipment daily for leaks and complete any required repairs before using the equipment in or near the water.
- 8. Lubricants composed of biodegradable base oils such as vegetable oils, synthetic esters, and polyalkylene glycols are recommended for use in equipment operated in or near water.
- 9. Operate vessels with minimal propulsion power to avoid prop scour damage to the bed and marine vegetation habitats.
- 10. Operate vessels during tidal elevations that are adequate to prevent grounding of the barge.
- 11. Do not stockpile construction material waterward of the ordinary high water line.

CONSTRUCTION-RELATED SEDIMENT, EROSION AND POLLUTION CONTAINMENT

- 12. Do not conduct project activities when the work area is inundated by tidal waters.
- 13. Containment booms are required during all in-water work.
- 14. Prevent contaminants from the project, such as petroleum products, hydraulic fluid, fresh concrete, sediments, sediment-laden water, chemicals, or any other toxic or harmful materials, from entering or leaching into waters of the state.
- 15. Use tarps or other methods to prevent treated wood, sawdust, trimmings, drill shavings and other debris from contacting the bed or waters of the state.

CONSTRUCTION MATERIALS

- 16. Do not use native bed material, other than material excavated for bulkhead footings or placement of bulkhead base rock, for project construction or fills.
- 17. To prevent leaching, construct forms to contain any wet concrete. Place impervious material over any exposed wet concrete that will come in contact with waters of the state. Forms and impervious materials must remain in place until



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Olympia, WA 98504-3234

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the concrete is cured.

18. Do not use wood treated with oil-type preservative (creosote, pentachlorophenol) in any hydraulic project. Wood treated with waterborne preservative chemicals (ACZA, ACQ) may be used if the Western Wood Preservers Institute has approved the waterborne chemical for use in the aquatic environment. The manufacturer must follow the Western Wood Preservers Institute guidelines and the best management practices to minimize the preservative migrating from treated wood into aquatic environments. To minimize leaching, wood treated with a preservative by someone other than a manufacturer must follow the field treating guidelines. These guidelines and best management practices are available at www.wwpinstitute.org.

BULKHEAD - TIMBER

19. Remove the existing timber bulkhead from the beach and deposit the bulkhead in an upland area above the limits of extreme high tide waters.

BULKHEAD - ROCK

- 20. As shown in the approved plans, the length of the new rock bulkhead must not exceed 95 ft.
- 21. Establish the waterward distance of the rock bulkhead from a permanent benchmark(s) (fixed objects) before starting work on the project. The benchmarks must be located and shown on supporting documents, marked in the field, and protected to serve as a post-project reference for ten years.
- 22. The waterward face of the rock bulkhead must be located no further waterward than the face of the existing functioning timber bulkhead as shown in the approved plans.
- 23. Build the rock bulkhead using clean, angular material of a sufficient durability and size to prevent its being broken up or washed away by high water or wave action.

BULKHEAD - SHEETPILE

- 24. The length of the new sheetpile bulkhead must not exceed 225 feet as shown in the approved plans.
- 25. Establish the waterward distance of the sheetpile bulkhead from a permanent benchmark(s) (fixed objects) before starting work on the project. The benchmarks must be located and shown on the approved plans, marked in the field, and protected to serve as a post-project reference for ten years.
- 26. The waterward face of the sheetpile bulkhead must be immediately waterward of and directly abutting the existing timber bulkhead. It must not encroach further waterward of the existing bulkhead than the thickness of the 3 inch sheetpile wall.

PILE REMOVAL & DRIVING

- 27. Remove the 67 creosote and steel existing piling and dispose of them in an upland area above extreme high tide waters.
- 28. The use of both a vibratory and/or an impact hammer is authorized for sheet pile installation under this Hydraulic Project Approval, however a vibratory driver is preferred.
- 29. Use appropriate sound attenuation when driving or proofing steel piling with an impact hammer.
- a. For driving or proofing steel piling, 10 inches in diameter or less, install a 6 inch thick wood block, plastic or rubber between the piling and the impact hammer during impact pile driving operations or install a pile sleeve or bubble curtain around the piling during impact pile driving operations that distributes air bubbles around 100% of the perimeter of the piling over the full depth of the water column.
- b. For driving or proofing steel piling greater than 10 inches in diameter, install a bubble curtain around the pile during piling impact driving operations that distributes air bubbles around 100% of the perimeter of the piling over the full depth of the water column.
- 30. Piling removal:
- a. Vibratory or direct pull extraction is the preferred method of pile removal.



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- b. Place the piling on a construction barge or other dry storage site after the piling is removed. The piling must not be shaken, hosed off, left hanging to dry or any other action intended to clean or remove adhering material from the piling near waters of the state.
- c. If a treated wood piling breaks during extraction, remove the stump from the water column by fully extracting. If the stump cannot be fully extracted, remove the remainder of the stump with a clamshell bucket, chain, or similar means, or cut it off three feet below the mudline. Cap all buried cut stumps and fill holes left by piling extraction with clean sediment that matches the native material.
- d. When removing creosote piling, containment booms and absorbent booms (or other oil absorbent fabric) must be placed around the perimeter of the work area to capture wood debris, oil, and other materials released into marine waters as a result of construction activities to remove creosote pilings. All debris on the bed and accumulated in containments structures must be collected and disposed upland at an approved disposal site.
- e. Submit post-project surveys (e.g., underwater video, photos at low-tide) along transects within the project area to Washington Department of Fish and Wildlife within two weeks of pile removal to verify debris removal.

COMPENSATORY MITIGATION

31. All mitigation actions must be completed before February 15th, 2027.

DEMOBILIZATION/CLEANUP

- 32. Remove all trash and unauthorized fill in the project area, including concrete blocks or pieces, bricks, asphalt, metal, treated wood, glass, floating debris, and paper, that is waterward of the ordinary high water line and deposit upland.
- 33. Remove any riprap (including quarry spalls) scattered, or abandoned outside the original design footprint from the bed and deposit it an upland area above the limits of extreme high tidal water.
- 34. Do not burn wood, trash, waste, or other deleterious materials waterward of the ordinary high water line.

LOCATION #1:	Site Name: Port of Ilwaco Marina 117 Howerton Avenue Southeast, Ilwaco, WA 98624							
WORK START:	November 1, 2	2024 WORK END:			February 15, 2027			
<u>WRIA</u>		Waterbody:		Tributary to:				
24 - Willapa		Other		Other				
1/4 SEC:	Section:	Township:	Range:	<u>Latitude:</u>	Longitude:	County:		
	33	10 N	11 W	46.30442	-124.03852	Pacific		
Location #1 Driving Directions								

From US 101 North traveling to the west

- · In Ilwaco, turn left onto Elizabeth Ave SE
- Turn right onto Howerton Ave SE
- The site is located to the south of the intersection of Howerton Ave SE and Waterfront Way.

APPLY TO ALL HYDRAULIC PROJECT APPROVALS



Washington Department of Fish & Wildlife PO Box 43234 Olympia, WA 98504-3234

(360) 902-2200

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This Hydraulic Project Approval pertains only to those requirements of the Washington State Hydraulic Code, specifically Chapter 77.55 RCW. Additional authorization from other public agencies may be necessary for this project. The person(s) to whom this Hydraulic Project Approval is issued is responsible for applying for and obtaining any additional authorization from other public agencies (local, state and/or federal) that may be necessary for this project.

This Hydraulic Project Approval shall be available on the job site at all times and all its provisions followed by the person (s) to whom this Hydraulic Project Approval is issued and operator(s) performing the work.

This Hydraulic Project Approval does not authorize trespass.

The person(s) to whom this Hydraulic Project Approval is issued and operator(s) performing the work may be held liable for any loss or damage to fish life or fish habitat that results from failure to comply with the provisions of this Hydraulic Project Approval.

Failure to comply with the provisions of this Hydraulic Project Approval could result in civil action against you, including, but not limited to, a stop work order or notice to comply, and/or a gross misdemeanor criminal charge, possibly punishable by fine and/or imprisonment.

All Hydraulic Project Approvals issued under RCW 77.55.021 are subject to additional restrictions, conditions, or revocation if the Department of Fish and Wildlife determines that changed conditions require such action. The person(s) to whom this Hydraulic Project Approval is issued has the right to appeal those decisions. Procedures for filing appeals are listed below.

MINOR MODIFICATIONS TO THIS HPA: You may request approval of minor modifications to the required work timing or to the plans and specifications approved in this HPA unless this is a General HPA. If this is a General HPA you must use the Major Modification process described below. Any approved minor modification will require issuance of a letter documenting the approval. A minor modification to the required work timing means any change to the work start or end dates of the current work season to enable project or work phase completion. Minor modifications will be approved only if spawning or incubating fish are not present within the vicinity of the project. You may request subsequent minor modifications to the required work timing. A minor modification of the plans and specifications means any changes in the materials, characteristics or construction of your project that does not alter the project's impact to fish life or habitat and does not require a change in the provisions of the HPA to mitigate the impacts of the modification. If you originally applied for your HPA through the online Aquatic Protection Permitting System (APPS), you may request a minor modification through APPS. A link to APPS is at http://wdfw.wa.gov/licensing/hpa/. If you did not use APPS you must submit a written request that clearly indicates you are seeking a minor modification to an existing HPA. Written requests must include the name of the applicant, the name of the authorized agent if one is acting for the applicant, the APP ID number of the HPA, the date issued, the permitting biologist, the requested changes to the HPA, the reason for the requested change, the date of the request, and the requestor's signature. Send by mail to: Washington Department of Fish and Wildlife, PO Box 43234, Olympia, Washington 98504-3234, or by email to HPAapplications@dfw.wa.gov. You should allow up to 45 days for the department to process your request.



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MAJOR MODIFICATIONS TO THIS HPA: You may request approval of major modifications to any aspect of your HPA. Any approved change other than a minor modification to your HPA will require issuance of a new HPA. If you originally applied for your HPA through the online Aquatic Protection Permitting System (APPS), you may request a major modification through APPS. A link to APPS is at http://wdfw.wa.gov/licensing/hpa/. If you did not use APPS you must submit a written request that clearly indicates you are requesting a major modification to an existing HPA. Written requests must include the name of the applicant, the name of the authorized agent if one is acting for the applicant, the APP ID number of the HPA, the date issued, the permitting biologist, the requested changes to the HPA, the reason for the requested change, the date of the request, and the requestor's signature. Send your written request by mail to: Washington Department of Fish and Wildlife, PO Box 43234, Olympia, Washington 98504-3234. You may email your request for a major modification to HPAapplications@dfw.wa.gov. You should allow up to 45 days for the department to process your request.

APPEALS INFORMATION

If you wish to appeal the issuance, denial, conditioning, or modification of a Hydraulic Project Approval (HPA), Washington Department of Fish and Wildlife (WDFW) recommends that you first contact the department employee who issued or denied the HPA to discuss your concerns. Such a discussion may resolve your concerns without the need for further appeal action. If you proceed with an appeal, you may request an informal or formal appeal. WDFW encourages you to take advantage of the informal appeal process before initiating a formal appeal. The informal appeal process includes a review by department management of the HPA or denial and often resolves issues faster and with less legal complexity than the formal appeal process. If the informal appeal process does not resolve your concerns, you may advance your appeal to the formal process. You may contact the HPA Appeals Coordinator at (360) 902-2534 for more information.

A. INFORMAL APPEALS: WAC 220-660-460 is the rule describing how to request an informal appeal of WDFW actions taken under Chapter 77.55 RCW. Please refer to that rule for complete informal appeal procedures. The following information summarizes that rule.

A person who is aggrieved by the issuance, denial, conditioning, or modification of an HPA may request an informal appeal of that action. You must send your request to WDFW by mail to the HPA Appeals Coordinator, Department of Fish and Wildlife, Habitat Program, PO Box 43234, Olympia, Washington 98504-3234; e-mail to HPAapplications@dfw.wa.gov; fax to (360) 902-2946; or hand-delivery to the Natural Resources Building, 1111 Washington St SE, Habitat Program, Fifth floor. WDFW must receive your request within 30 days from the date you receive notice of the decision. If you agree, and you applied for the HPA, resolution of the appeal may be facilitated through an informal conference with the WDFW employee responsible for the decision and a supervisor. If a resolution is not reached through the informal conference, or you are not the person who applied for the HPA, the HPA Appeals Coordinator or designee may conduct an informal hearing or review and recommend a decision to the Director or designee. If you are not satisfied with the results of the informal appeal, you may file a request for a formal appeal.

B. FORMAL APPEALS: WAC 220-660-470 is the rule describing how to request a formal appeal of WDFW actions taken under Chapter 77.55 RCW. Please refer to that rule for complete formal appeal procedures. The following information summarizes that rule.



Washington Department of Fish & Wildlife PO Box 43234 Olympia, WA 98504-3234

(360) 902-2200

for Director

Permit Number: 2024-6-66+01 Issued Date: February 22, 2024 Project End Date: February 15, 2027 FPA/Public Notice Number: N/A

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A person who is aggrieved by the issuance, denial, conditioning, or modification of an HPA may request a formal appeal of that action. You must send your request for a formal appeal to the clerk of the Pollution Control Hearings Boards and serve a copy on WDFW within 30 days from the date you receive notice of the decision. You may serve WDFW by mail to the HPA Appeals Coordinator, Department of Fish and Wildlife, Habitat Program, PO Box 43234, Olympia, Washington 98504-3234; e-mail to HPAapplications@dfw.wa.gov; fax to (360) 902-2946; or hand-delivery to the Natural Resources Building, 1111 Washington St SE, Habitat Program, Fifth floor. The time period for requesting a formal appeal is suspended during consideration of a timely informal appeal. If there has been an informal appeal, you may request a formal appeal within 30 days from the date you receive the Director's or designee's written decision in response to the informal appeal.

C. FAILURE TO APPEAL WITHIN THE REQUIRED TIME PERIODS: If there is no timely request for an appeal, the WDFW action shall be final and unappealable.

Habitat Biologist Lauren.Bauernschmidt@dfw.wa.gov

> 360-480-2558 **WDFW**

Jawren Baueruschmutt

Lauren Bauernschmidt

PORT OF ILWACO Marine Structures Replacement Ilwaco, WA

Appendix A8

Ecology CZM CD



DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

February 26, 2024

Port of Ilwaco ATTN: Tracy Lofstrom P.O. Box 307 Ilwaco, WA 98624

Re: Coastal Zone Management Federal Consistency Decision for Port of Ilwaco East

Bulkhead Resilience Project (Corps No. NWP-2022-525), in Baker Bay, Ilwaco, Pacific

County, Washington

Dear Tracy Lofstrom:

On September 8, 2023, the Department of Ecology (Ecology) received a Certification of Consistency with the Washington State Coastal Zone Management Program (CZMP) for the above project. Pursuant to Section 307(c)(3) of the Coastal Zone Management Act of 1972 as amended, Ecology concurs with Port of Ilwaco's determination that the proposed work is consistent with Washington's CZMP.

The proposed work includes replacing a failing bulkhead with a new structure and repair slope protection north and south of the existing bulkhead. Additional work entails paving and regrading the upland wharf area directly landward of the bulkhead to mitigate projected seal level rise.

Bulkhead Replacement: The majority of the existing bulkhead will be abandoned in place but the top several feet of timber above the timber wale may be removed and localized notching of the existing bulkhead to accommodate installing new tie-back ground anchors for the new bulkhead. The new bulkhead will be constructed directly adjacent to the existing structure. New sheet pile will be driven into the substrate and drainage rock will be placed between the existing bulkhead and the new bulkhead wall to maintain water pressure equilibrium on both sides of the bulkhead. The length of the bulkhead will remain the same but will be ~3 feet higher than the existing structure to accommodate for projected sea level rise.

Slope Protection Repair: An existing creosote treated timber retaining wall located to the north of the bulkhead will be completely removed and replaced with 198 cubic yards of riprap. A layer

Corps No. NWP-2022-525, Aquatics ID No. 142236 February 26, 2024 Page 2 of 3

of fish mix rock will be placed over the riprap located below the high tide line to provide fish habitat. To the south of the existing bulkhead, 14 cubic yards of concrete rubble will be replaced with 35 cubic yards of riprap.

To mitigate for aquatic impacts the following actions will be taken:

- Removal of ~28 creosote-treated timber piles and 3 steel piles will be removed adjacent to the existing bulkhead.
- Removal of 36 derelict creosote-treated timber piles and 3 creosote-treated timber pile caps.
- Removal of a derelict structure ~ 2510 square feet in area will be removed decreasing overwater coverage.

This activity is located at 117 Howerton Ave SE, Ilwaco in Baker Bay, Pacific County, Washington.

If you have any questions regarding Ecology's decision, please contact Brook Swensen at 564-999-1749.

Your right to appeal

You have a right to appeal this decision to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal, you must do all of the following within 30 days of the date of receipt of this decision:

- File your notice of appeal and a copy of this decision with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular business hours as defined in WAC 371-08-305 and -335. "Notice of appeal" is defined in WAC 371-08-340.
- Serve a copy of your notice of appeal and this decision on the Department of Ecology mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Filing an appeal

Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: https://eluho.wa.gov/ or call: 360-664-9160.

Corps No. NWP-2022-525, Aquatics ID No. 142236 February 26, 2024 Page 3 of 3

Service on Ecology

Street Addresses:

Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503

Mailing Addresses:

Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608

E-Mail Address:

ecologyappeals@ecy.wa.gov

Sincerely,

Loree' Randall, Section Manager Aquatic Permitting & Protection Section

Jane Randell

Shorelands and Environmental Assistance Program

Sent via e-mail: tlofstrom@portofilwaco.org

E-cc: Kinsey Friesen, U.S. Army Corps of Engineers

Victoria England, Moffat & Nichol

Brook Swensen, Ecology fedconsistency@ecy.wa.gov

PORT OF ILWACO Marine Structures Replacement Ilwaco, WA

Appendix A9

Ecology WQC Order No. 22523

England, Victoria

From: Swensen, Brook (ECY) < bswe461@ECY.WA.GOV>

Sent: Tuesday, May 21, 2024 7:19 AM

To: England, Victoria; Friesen, Kinsey M CIV USARMY CENWP (USA)

Cc: Schwertner, Margaret; Tracy Lofstrom; HPA Applications (DFW); Bauernschmidt, Lauren

N (DFW); Holly Beller; Stringer, Stuart; ECY RE FED NOTIFICATION (SEA)

Subject: RE: Port of Ilwaco Bulkhead Resilience Project NWP-2022-525; FWS/R1/2023-0026807;

WCRO 2022-03087; HPA32313; WQC 22523

CAUTION: This email originated from outside of the organization.

Thank you Victoria,

Ecology has no problem with the change in work window.

Brook Swensen (she/her)

Aquatic Permit Specialist $\,|\,$ Aquatic Permitting & Protection Section Work Hours 7-3:30 M-F

Cell: (564) 999-1749 | <u>bswe461@ecy.wa.gov</u>



NOTICE: This communication is a public record and may be subject to disclosure pursuant to the Public Records Act (RCW 42.56).

From: England, Victoria < vengland@moffattnichol.com>

Sent: Monday, May 20, 2024 10:09 AM

To: Friesen, Kinsey M CIV USARMY CENWP (USA) <Kinsey.M.Friesen@usace.army.mil>

Cc: Schwertner, Margaret <mschwertner@moffattnichol.com>; Tracy Lofstrom <tlofstrom@portofilwaco.org>; HPA

Applications (DFW) < hpaapplications@dfw.wa.gov>; Bauernschmidt, Lauren N (DFW)

<Lauren.Bauernschmidt@dfw.wa.gov>; ECY RE FED PERMITS (SEA) <ECYREFEDPERMITS@ECY.WA.GOV>; Swensen,

Brook (ECY)

Stwe461@ECY.WA.GOV>; Holly Beller <treasurer@ilwaco-wa.gov>; Stringer, Stuart <sstringer@moffattnichol.com>

Subject: Port of Ilwaco Bulkhead Resilience Project NWP-2022-525; FWS/R1/2023-0026807; WCRO 2022-03087; HPA32313; WQC 22523

EΩte∑al Ernail

Hello,

This email serves as notification that the services, NMFS/NOAA (WCRO 2022-03087) and USFWS (FWS/R1/2023-0026807), have approved the requested early start date to the allowable in-water work window for the Port of Ilwaco Bulkhead Resilience project with the revised approved work window of September 1 through February 28. The attached include email approvals from the services as well as an approval of a minor modification of the project HPA 32313 (revising the in-water work window end date to February 28).

Please let us know if you have any questions. Kind regards,

Victoria R. England, LG, Env SP

Senior Environmental Scientist

600 University Street, Suite 610 | Seattle, WA 98101 **P** 206.501.2332



moffattnichol.com Creative People, Practical Solutions.®









Join Our Team.

Unlock your potential and join our team—we're looking for creative minds with practical solutions! Per Title VI of the Civil Rights

Act, Moffatt & Nichol will not discriminate on the grounds of race, color, or national origin in the selection and retention of subconsultants, including procurement of materials and leases of equipment. Moffatt & Nichol will ensure that minorities will be afforded full opportunity to present proposals and will not be discriminated against in consideration for an award. For additional information go to: http://www.moffattnichol.com/content/small-business-outreach.



DEPARTMENT OF ECOLOGY

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

February 22, 2024

Port of Ilwaco ATTN: Tracy Lofstrom P.O. Box 307 Ilwaco, WA 98624

Re: Water Quality Certification Order No. **22523** (Corps No. NWP-2022-525), Port of Ilwaco East Bulkhead Resilience Project, Pacific County, Washington

Dear Tracy Lofstrom:

On July 6, 2023, the Port of Ilwaco submitted a request for a Section 401 Water Quality Certification (WQC) under the federal Clean Water Act for the Port of Ilwaco East Bulkhead Resilience project in Pacific County, Washington.

On behalf of the state of Washington, the Department of Ecology certifies with conditions that the work described in the Water Quality Certification Request and supplemental documents complies with applicable provisions of Sections 301, 302, 303, 306, and 307 of the Clean Water Act, as amended, and applicable state laws. This certification is subject to the enclosed Water Quality Certification Order (WQC Order).

Please ensure that anyone doing work under this WQC Order has read, is familiar with, and is able to follow all of the provisions within the attached WQC Order.

If you have any questions about this decision, please contact Brook Swensen at 564-999-1749. The enclosed WQC Order may be appealed by following the procedures described within.

Sincerely,

Loree' Randall, Section Manager

Jan Randell

Aquatic Permitting & Protection Section

Shorelands and Environmental Assistance Program

WQC Order No. 22523, Corps No. NWP-2022-525 Aquatics ID No. 142236 February 22, 2024 Page 2 of 2

Enclosure (1)

By certified mail: 9489 0090 0027 6383 2203 14

Sent via e-mail: tlofstrom@portofilwaco.org

E-cc: Kinsey Friesen, U.S. Army Corps of Engineers

Victoria England, Moffat & Nichol

Brook Swensen, Ecology

ECYREFEDPERMITS@ecy.wa.gov

In The Matter of Granting a Water Quality Certification With Conditions to Port of Ilwaco pursuant to 33 U.S.C. 1341 (FWPCA § 401), RCW 90.48.120, RCW 90.48.260 and Chapter 173-201A WAC

Port of Ilwaco

Attn: Tracy Lofstrom

P.O. Box 307

Ilwaco, Washington 98624

WQC Order No.	22523
Corps Reference No.	NWP-2022-525
Site Location	Port of Ilwaco East Bulkhead Resilience located within Baker Bay, Pacific County, Washington.

The Port of Ilwaco submitted a request for a Section 401 Water Quality Certification (WQC) under the federal Clean Water Act for the Port of Ilwaco East Bulkhead Resilience, Pacific County, Washington. The following required processing dates are listed below:

- On 12/8/2022, the Port of Ilwaco submitted a pre-filing meeting request.
- On 7/6/2023, Ecology received a request for Clean Water Section 401 Water Quality Certification.
- On 7/13/2023, the Port of Ilwaco submitted additional information, and the Department of Ecology (Ecology) considered the Request valid on this date.
- Ecology's "Reasonable Period of Time" for this project has been established as 7/6/2024.
- On 10/6/2023, the U.S. Army Corps of Engineers (Corps) issued a joint public notice.

This project proposes to replace a failing bulkhead with a new structure and repair slope protection north and south of the existing bulkhead. Additional work entails paving and regrading the upland wharf area directly landward of the bulkhead to mitigate projected seal level rise.

Bulkhead Replacement: The majority of the existing bulkhead will be abandoned in place but the top several feet of timber above the timber wale may be removed and localized notching of the existing bulkhead to accommodate installing new tie-back ground anchors for the new bulkhead. The new bulkhead will be constructed directly adjacent to the existing structure. New sheet pile will be driven into the substrate and drainage rock will be placed between the existing bulkhead and the new bulkhead wall to maintain water pressure equilibrium on both

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sides of the bulkhead. The length of the bulkhead will remain the same but will be ~3 feet higher than the existing structure to accommodate for projected sea level rise.

Slope Protection Repair: An existing creosote treated timber retaining wall located to the north of the bulkhead will be completely removed and replaced with 198 cubic yards of riprap. A layer of fish mix rock will be placed over the riprap located below the high tide line to provide fish habitat. To the south of the existing bulkhead, 14 cubic yards of concrete rubble will be replaced with 35 cubic yards of riprap.

To mitigate for aquatic impacts the following actions will be taken:

- Removal of ~28 creosote-treated timber piles and 3 steel piles will be removed adjacent to the existing bulkhead.
- Removal of 36 derelict creosote-treated timber piles and 3 creosote-treated timber pile caps.
- Removal of a derelict structure ~ 2510 square feet in area will be removed decreasing overwater coverage.

The project site is located at 117 Howerton Ave SE, Ilwaco in Baker Bay, Pacific County, Washington, Section 33 and 34, Township 10 N., Range 11 W., within Water Resource Inventory Area (WRIA) 24 - Willapa.

With this WQC Order, Ecology is granting with conditions the Port of Ilwaco's request for a Section 401 Water Quality Certification for the Port of Ilwaco East Bulkhead Resilience project, provided that the activity is conducted in accordance with the Section 401 Water Quality Certification request and attachments Ecology received on 7/6/2023, and the following supporting documentation:

1. E-mail to Ecology dated 2/8/2024, regarding water quality monitoring and agreement to conduct physical sampling, if needed, to determine compliance with the water quality standards.

Based on the information submitted, Ecology has determined that the discharge from the project will comply with state water quality requirements. Prior to undertaking any changes that materially alter the project, the Port of Ilwaco must contact Ecology to determine whether a new Section 401 Water Quality Certification is required.

Issuance of this Section 401 Water Quality Certification for this proposal does not authorize the Port of Ilwaco to exceed applicable state water quality standards (Chapter 173-201A WAC), ground water quality standards (Chapter 173-200 WAC), or sediment quality standards (Chapter 173-204 WAC). Furthermore, nothing in this Section 401 Water Quality Certification

WQC Order No. 22523, Corps No. NWP-2022-525 Aquatics ID No. 142236 February 22, 2024 Page 3 of 6

absolves the Applicant from liability for contamination and any subsequent cleanup of surface waters, ground waters, or sediments resulting from project construction or operations.

Special Conditions:

- 1. No petroleum products, fresh concrete, lime or concrete, chemicals, or other toxic or deleterious materials shall be allowed to enter waters of the state.
 - Justification Ecology must protect waters of the state from all discharges and potential discharges of pollution that can affect water quality to protect aquatic life and beneficial uses.
 - Citation Chapter 90.48 RCW, RCW 90.48.030, RCW 90.48.080, Chapter 173-201A
 WAC, WAC 173-201A-300 330, WAC 173-204-120, and WAC 173-225-010.
- 2. The following notifications shall be made via phone or e-mail (e-mail is preferred) to Ecology's Federal permit Manager via e-mail to fednotification@ecy.wa.gov and cc to brook.swensen@ecy.wa.gov Notifications shall be identified with WQC Order No. 22523, Corps Reference No. NWP-2022-525, and include the Project Proponent name, project name, project location, project contact and the phone number.
 - a. Immediately following a violation of state water quality standards or when the project is out of compliance with any conditions of this WQC Order;
 - b. At least 10 days prior to all pre-construction meetings
 - c. At least 10 days prior to conducting initial in-water work activities.
 - Justification Ecology has independent state authority to ensure protection of state water quality. Ecology must be aware of when a project starts and ends and whether there are any issues. This allows Ecology to evaluate compliance with the state water quality requirements.
 - Citation Chapter 90.48 RCW, RCW 90.48.030, RCW 90.48.120, Chapter 173-201A
 WAC, WAC 173-201A-300 330, Chapter 173-204 WAC, and WAC 173-225-010.

In view of the foregoing and in accordance with 33 U.S.C. §1341, RCW 90.48.120, RCW 90.48.260 Chapter 173-200 WAC and Chapter 173-201A WAC, this WQC is granted with conditions to the Port of Ilwaco for the Port of Ilwaco East Bulkhead Resilience project.

This Certification is not effective until the U.S. Corps of Engineers (Corps) Seattle District issues a Department of the Army (DA) permit for this project. WQC Order No. **22523** will remain valid for the duration of the associated DA permit. The Port of Ilwaco should send a copy of the final

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DA permit to fednotification@ecy.wa.gov within two weeks of receiving it. To transfer this Order to a new owner or operator, complete a Request for Transfer of Order form following the instructions at the top of the form. Link to form:

https://apps.ecology.wa.gov/publications/SummaryPages/ECY070695.html.

Your right to appeal

You have a right to appeal this Order to the Pollution Control Hearings Board (PCHB) within 30 days of the date of receipt. The appeal process is governed by Chapter 43.21B RCW and Chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal, you must do all of the following within 30 days of the date of receipt of this Order:

- File your notice of appeal and a copy of this Order with the PCHB (see filing information below). "Filing" means actual receipt by the PCHB during regular business hours as defined in WAC 371-08-305 and -335. "Notice of appeal" is defined in WAC 371-08-340.
- Serve a copy of your notice of appeal and this Order on the Department of Ecology mail, in person, or by email (see addresses below).

You must also comply with other applicable requirements in Chapter 43.21B RCW and Chapter 371-08 WAC.

Filing an appeal

Filing with the PCHB

For the most current information regarding filing with the PCHB, visit: https://eluho.wa.gov/ or call: 360-664-9160.

Service on Ecology

Street Addresses:

Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503

Mailing Addresses:

Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608 WQC Order No. 22523, Corps No. NWP-2022-525 Aquatics ID No. 142236 February 22, 2024 Page 5 of 6

E-Mail Address:

ecologyappeals@ecy.wa.gov

Americans with Disabilities Act Information

Accommodation Requests

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-6831 or visit https://ecology.wa.gov/accessibility. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Contact Information

Please direct all questions about this WQC Order to:

Brook Swensen
Department of Ecology
564-999-1749
brook.swensen@ecy.wa.gov

More Information

• Pollution Control Hearings Board Website

https://eluho.wa.gov

• <u>Chapter 43.21B RCW - Environmental and Land Use Hearings Office - Pollution Control</u> Hearings Board

http://app.leg.wa.gov/RCW/default.aspx?cite=43.21B

• Chapter 371-08 WAC – Practice And Procedure

http://app.leg.wa.gov/WAC/default.aspx?cite=371-08

• Chapter 34.05 RCW – Administrative Procedure Act

http://app.leg.wa.gov/RCW/default.aspx?cite=34.05

• <u>Chapter 90.48 RCW – Water Pollution Control</u>

http://app.leg.wa.gov/RCW/default.aspx?cite=90.48

• Chapter 173.204 WAC – Sediment Management Standards

http://apps.leg.wa.gov/WAC/default.aspx?cite=173-204

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<u>Chapter 173-200 WAC – Water Quality Standards for Ground Waters of the State of Washington</u>

http://apps.leg.wa.gov/WAC/default.aspx?cite=173-200

• Chapter 173-201A WAC – Water Quality Standards for Surface Waters of the State of Washington

http://apps.leg.wa.gov/WAC/default.aspx?cite=173-201A

Signature

Dated this 22nd day of February, 2024 at the Department of Ecology, Lacey, Washington.

Loree' Randall, Section Manager

Jan Randell

Aquatic Permitting & Protection Section

Shorelands and Environmental Assistance Program

England, Victoria

From: Kelley, Penny (ECY) < PKEL461@ECY.WA.GOV>

Sent: Thursday, February 8, 2024 11:18 AM

To: England, Victoria

Cc: Swensen, Brook (ECY); Tracy Lofstrom; Schwertner, Margaret

Subject: RE: Port of Ilwaco East Bulkhead Resilience Project - Ecology # 142236

Thank you for the response. Ecology is currently working on drafting up the 401 decision document. We do not have any further comments or questions regarding the project.

Penny Kelley WSDOT Liaison Work #/cell 360-280-8856 pkel461@ecy.wa.gov

From: England, Victoria < vengland@moffattnichol.com >

Sent: Thursday, February 8, 2024 10:35 AM **To:** Kelley, Penny (ECY) < PKEL461@ECY.WA.GOV>

Margaret <mschwertner@moffattnichol.com>

Subject: RE: Port of Ilwaco East Bulkhead Resilience Project - Ecology # 142236

External Email

Hi Penny,

The Port of Ilwaco, Port Manager Tracy Lofstrom cc-ed, is comfortable with the requirement to have turbidity monitoring equipment on hand during the Port of Ilwaco East Bulkhead Resilience Project (Ecology # 142236) in the event that instrumented monitoring gets triggered by the visual monitoring. Additionally, the Port has vessels that can be used as needed for sampling/monitoring purposes.

Please let us know if you have any other questions or require additional clarification.

Kind regards,

Victoria

Victoria R. England, LG

Senior Environmental Scientist

Moffatt & Nichol

600 University Street, Suite 610 | Seattle, WA 98101 P 206.501.2331 | D 206.501.2332

From: Kelley, Penny (ECY) < PKEL461@ECY.WA.GOV>

Sent: Thursday, February 1, 2024 9:34 AM

To: England, Victoria < vengland@moffattnichol.com >

Cc: Swensen, Brook (ECY) < bswe461@ECY.WA.GOV>

Subject: Port of Ilwaco East Bulkhead Resilience Project - Ecology # 142236

CAUTION: This email originated from outside of the organization.

Hello Victoria,

Thank you for taking the time to discuss the Port of Ilwaco project yesterday. As we discussed, I am providing a summary of our discussion on WQ monitoring and some follow up points.

- All of the various aspects of work do not entail any in-water excavation.
- The floating booms referred to in the JARPA are surface only and not turbidity curtains
- It may be possible for the Port to require the contractor to have a curtain on hand as a contingency measure for turbidity
- The curtain would not be a contingency measure for piling work as that is a bit of a dispersed area of work
- A vibratory hammer would be used for the piling work which creates less turbidity
- EPA BMPs for pile removal will be required (also helps minimize turbidity problems)
- The Port believes visual monitoring is sufficient because the activities have minimal disturbance of the sediments
- Ecology is ok with visual monitoring as long as the Port agrees that monitoring equipment will be on hand to do physical sampling if needed.

I know you need to check with the Port about the curtain and the monitoring equipment and will loop back with Ecology. I do need the Port to agree to the equipment for water quality monitoring for us to agree that visual can be the main tool for monitoring and no plan is needed. One other point to bring up that we did not talk about; it is expected that physical sampling can be done if needed and that means thinking of access, usually a small boat. So when talking with the Port, that would be important to clarify. Please let Brook and myself know if there are any questions or concerns.

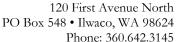
Penny Kelley WSDOT Liaison Work #/cell 360-280-8856 pkel461@ecy.wa.gov

PORT OF ILWACO

Marine Structures Replacement *Ilwaco, WA*

Appendix A10

City of Ilwaco SEPA DNS and Checklist



Phone: 360.642.3145 Fax: 360.642.3155 www.ilwaco-wa.gov



The City of Ilwaco is an equal opportunity provider and employer.

Determination of Non-Significance

PROJECT NAME: Port of Ilwaco East Bulkhead Resilience Project

APPLICANT NAME: Tracy Lofstrom (Port of Ilwaco Manager)

POINT OF CONTACT: Victoria England, Moffatt & Nichol

LOCATION OF PROPOSAL: 117 Howerton Avenue SE on the following tax parcels: 73048003011, 73048003009 and 73031013000.

DESCRIPTION OF PROPOSAL: At its commercial fishing wharf, currently occupied by Safe Coast Seafoods, the Port of Ilwaco proposes to replace the failing east bulkhead with a sheetpile bulkhead, replace the slope protection to the north and south of the east bulkhead, and pave and regrade the upland wharf area directly landward of the east bulkhead to mitigate the effects of sea level rise.

LEAD AGENCY: City of Ilwaco

THRESHOLD DETERMINATION: The lead agency, City of Ilwaco, has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) IS NOT required under RCW 43.21C.030(2)(c). This decision was made after reviewing the proposal and all supporting documents. This information is available to the public for review upon request at the City of Ilwaco Building and Planning Department, 120 First Avenue, Ilwaco, WA 98624 between the hours of 8:00 a.m. and 5:00 p.m. Monday through Friday, excluding holidays.

This Determination of Non-significance is issued using the DNS process in WAC 197-11-340; there is a comment period and an appeal period on the DNS.

() There is no comment period for the DNS.

(X) This DNS is issued under 197-11-340(2); the lead agency will not act on this proposal for 14 days.

Date of Determination and Issuance: November 8, 2023

Deadline for Submitting Comments: 5:00 P.M. on November 22, 2023

Deadline for Submitting Appeals: 5:00 P.M. on November 22, 2023

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to <u>all parts of your proposal</u>, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the <u>SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D)</u>. Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

- A. Background [HELP]
- 1. Name of proposed project, if applicable: Port of Ilwaco East Bulkhead Resilience Project
- 2. Name of applicant: Tracy Lofstrom, Port Manager
- 3. Address and phone number of applicant and contact person:

Applicant Address: PO. Box 307

Ilwaco, WA 98624

Applicant Phone Number: (360) 642-3143 Applicant email: tlofstrom@portofilwaco.org

Contact Person: Victoria England (Moffatt & Nichol) 206-622-0222, email

vengland@moffattnichol.com

4. Date checklist prepared: June 2023

5. Agency requesting checklist: City of Ilwaco

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

Start Date: November 2024 End Date: February 2025

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

No.

- 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 (JARPA) and affiliated JARPA sheets (plans)
 - Biological Evaluation (Moffatt & Nichol 2022) Submitted to NMFS December 2022
 - 2023 Geotechnical Report GeoEngineers
 - 2022 Eelgrass Survey GeoEngineers
 - Cultural Resources Survey Willamette CRA
 - NEPA EA (in progress)
 - Mitigation Sequencing Analysis and No Net Loss Narrative (Moffatt & Nichol 2023)
- 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.

No other known applications are pending for governmental approvals of other proposals directly affecting the property covered by this proposal.

- 10. List any government approvals or permits that will be needed for your proposal, if known.
 - US Army Corps of Engineers (USACE) Section 10/404
 - NOAA/NMFS: Endangered Species Act/Magnuson Stevenson Act consultation

- USFWS: Endangered Species Act
- City of Ilwaco: SEPA Determination
- City of Ilwaco Shoreline/Critical Areas Conditional Use Permit
- City of Ilwaco Master Planning Permit
- WA Dept. of Fish and Wildlife Hydraulic Project Approval (HPA)
- Dept. of Ecology (DOE) Coastal Zone Management (CZM) consistency
- WA Dept. of Natural Resources (DNR) Project Aquatic Use Authorization
- 11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposed Port of Ilwaco East Bulkhead Resilience Project (herein referred to as the 'Project') consists of three primary elements;

- 1. Replacing the failing creosote treated timber east bulkhead with an anchored steel sheetpile bulkhead;
- 2. Repairing slope protection north and south of the bulkhead; and,
- 3. Paving and grading the upland wharf area directly landward of the bulkhead to mitigate the effects of sea level rise.

As part of the above elements, creosote-treated timber that configures the external wall of the existing bulkhead and retaining wall will be removed along with select derelict creosote-treated piles next to the bulkhead. Additional derelict creosote piles and cross members will be removed from the slip adjacent to the bulkhead as mitigation for project impacts resulting from drainage rock fill placement between the existing bulkhead and the new bulkhead necessary to maintain water pressure equilibrium on both sides of the bulkhead. The removal of creosote from the marine environment will also mitigate impacts associated with the riprap shoreline protection that is proposed to replace the derelict creosote treated timber revetment/retaining wall and associated elements. A fish mix gravel layer will be placed between HTL and the toe of the riprap on the surface of the rip rap slope protection at the head of the slip to provide beach nourishment and habitat improvements for fish passing through the marina. Additionally, an approximately 2,510 sf derelict structure and associated floating timber debris will be removed from the south portion of the marina as mitigation for project impacts.

The proposed Project is required for improved the safety, efficiency, and reliable use of the wharf. The Port is a key hub for commercial fishing, seafood and aquaculture processing, and recreation activities that greatly benefit the regional economy. The commercial fishing wharf, operated by Safe Coast Seafoods, is one of the most active in the state, landing roughly \$14 million in commercial seafood each year. Repair of the bulkhead wall is critical to ongoing operations at Safe Coast Seafoods. In its current condition, the bulkhead is in serious structural condition and at risk of failing. Recent biweekly

and monthly measurements have been completed to monitor ongoing movement of the bulkhead. The monitoring has recorded movement along 13 monitoring points along the face of the bulkhead ranging from approximately 0.06 inch to up to 0.31 inch waterward i since monitoring began in November 2022. The monitoring indicates that the bulkhead is the process of active failure. Frequent flooding due to high water levels from "king tides" and severe winter storm surges further threaten the structural capacity of the bulkhead.

Bulkhead failure would shut down cargo operations at the Port and negatively impact a wide variety of businesses in maritime and non-maritime sectors including Safe Coast Seafoods. The shutdown of the Safe Coast site due to failure of the bulkhead would lead to a series of economic impacts for many more workers and businesses and the region. Bulkhead failure would also adversely affect the Port of Ilwaco Marina operations, likely fully blocking at least one slip from use and potentially causing damage to adjacent float structures and tenant vessels. Until this project is completed, the facility is capacity-limited and at risk. The main access driveway to Safe Coast Seafoods has been blocked based on recommended load limitations in an effort to minimize vibration and load resulting from vehicles and machinery using the driveway located adjacent to the failing bulkhead. Without the Project, the eventual closure of the wharf will have cascading negative transportation and economic impacts for the region.

The Project would also serve the following purposes and provide the following benefits:

- The replacement bulkhead will serve as the initial phase to increase the facility's climate change/sea level rise resiliency and will help protect wharf facilities from flooding. The bulkhead will be designed to accommodate the planned increase to wharf/Safe Coast facility ground floor elevations in the future.
- The top of the embankment elevation to the north of the bulkhead will be raised to approximately +14 feet (mean lower low water) MLLW and the existing creosote-treated retaining wall will be replaced with rip rap to improve shoreline protection. The increase to top of bank elevation will mitigate sea level rise impacts between the bulkhead and the marina access pier to the east.
- Re-grading and re-paving of the upland area behind the bulkhead wall will facilitate positive drainage away from the Safe Coast Seafoods buildings and help protect the facilities during flood events.
- The bulkhead replacement would prevent the shoreline from failing into a portion of the active Port of Ilwaco Marina, which would impact operations in the marina and potentially damage adjacent float structures and tenant vessels, if any, present at the time of failure.
- The new bulkhead will be designed to accommodate the temporary mooring of fishing vessels which will allow vessels to unload/load equipment and product and improve efficiencies at the Safe Coast Seafoods facility. Under existing conditions, the timber bulkhead is used for temporary mooring but cannot currently be used for loading/unloading of vessels due to its existing poor, unstable, deteriorating condition.
- The Project will allow trucks to drive safely on the bulkhead again, which will improve the
 efficiency of cargo transfer operations and improve the port's competitiveness. The adjacent

roadway has been closed to vehicle access due to load limitations recommended based on the poor condition of the existing bulkhead, including measurements exhibiting ongoing movement of the failing bulkhead waterward as observed during monitoring episodes from November 2022 to the present.

- The removal of creosote-treated wood (north slip revetment, derelict piles and cross members, and portions of the existing bulkhead as safely able) from the marine environment will provide water quality benefits. Placement of a layer of fish mix gravel over the rip rap shoreline protection to be placed on the slope at the head of the adjacent slip.

The following is a more detailed description of the project elements.

Bulkhead Replacement

Construction sequencing for the proposed bulkhead replacement will likely be as follows:

- Localized demolition of the existing bulkhead wall
- Installation of the new steel sheet pile wall just waterward off the existing bulkhead.
- Placement of drainage rock between the existing bulkhead wall and new bulkhead wall

The majority of the existing timber bulkhead will be abandoned in place behind the replacement bulkhead in order to protect the existing buildings at the Safe Coast Seafoods facility, as complete removal of the existing timber bulkhead will undermine the stability of the soil behind the bulkhead and the adjacent building foundations threatening Safe Coast buildings, infrastructure, and operations. Portions of the existing creosote-treated bulkhead will be removed as feasible. Localized bulkhead demolition will likely consist of removal of the rotten top several feet of the existing creosote-treated timber piles above the timber wale location. This local demolition will take place above mean higher high water (MHHW). In addition, there may be localized notching of the bulkhead wall to accommodate the installation of the new tie-back ground anchors. Approximately twelve (12) 12-inch diameter creosote treated timber piles and three (3) 12-inch diameter steel pipe piles that are located directly waterward of the existing timber bulkhead will be removed. These piles will be removed by either pulling them out directly using a chain or with a vibratory hammer depending on the Contractors preferred means and methods. The piles will be cut at the mudline if complete removal is not possible or the piles break. Upland demolition will consist of removal of the existing pavement and surface features.

Post-localized demolition, a new steel sheet pile bulkhead wall will be installed in front of the existing timber bulkhead. The bulkhead wall will not increase in length. The top elevation of the new bulkhead wall will be approximately three feet (ft) higher than the existing top of bulkhead to accommodate high tides and sea level rise. It is anticipated that the steel sheet piles will be driven using a vibratory hammer. The option for impact proofing will also be included in the event that difficult driving conditions are encountered. The sheet pile wall will be approximately 225 linear feet (lf) and the sheet pile tip elevation will be approximately -40 to -50 feet MLLW. The top of the bulkhead pile cap will be set at an elevation of +14.0 feet MLLW.

The replacement bulkhead will include approximately 20 grouted ground anchors extending from the cast-in-place concrete pile caps down to the bedrock layer below the site. The grouted ground anchors will be either high strength steel strands or steel bars that are connected to the pile caps and driven at an approximately 1:1 angle to elevation -70 to -80 feet MLLW. The anchor tie backs will be grouted for a minimum of 25 feet into the underlying siltstone unit (top elevation approximately -57 feet MLLW). The ground anchors will be installed using either land-based equipment or from a barge depending on the Contractors preferred means and methods. The anchor holes will be drilled with a full-length casing. All drill spoils will be contained and prevented from entering marine waters. The anchor holes will be filled with grout using a tremie tube and then pressure grouted after the anchor tendons are installed. The anchors will be tensioned after all anchors have been installed and have reached the required grout and concrete strengths. The cast-in-place concrete pile cap will then be completed. The pile caps will be cast-in place in the dry and uncured concrete will not be allowed to come in contact with waters of Baker Bay.

The sheet pile placement in front of the existing bulkhead will result in an approximately 2- to 5-foot space between the existing bulkhead and the new bulkhead sheet piles. The area between the existing structure and the new bulkhead will be backfilled with drainage rock to allow for water to flow in and out of the soil supporting the Safe Coast Seafood facility. It is anticipated that approximately 450 cubic yards of free draining drainage rock backfill will be placed between the existing timber bulkhead and the replacement bulkhead (Table 1). The drainage rock will likely be placed using a clamshell operating from a barge. The clean drainage rock will be obtained from a commercial supplier. This placement will minimize the risk of slope failure that removing the existing structure would exacerbate. The drainage rock placement in the space between the existing and replacement bulkhead structures will minimize additional pressure from trapped groundwater behind the new bulkhead.

The new bulkhead (including drain rock installation area), and pile cap, will have a footprint of approximately 1,400 square feet (sf) in marine waters (measured below the high tide line [HTL]) (Table 1). Of the overall footprint in marine waters, 1,000 sf will come into contact with the bottom substrate and have benthic habitat impacts.

Slope Protection

Approximately 350 sf (approximately 14 cubic yards [cy]cy) of concrete debris shore protection from the shoreline to the south of the bulkhead wall will be removed to accommodate the bulkhead wall replacement (Table 1). Approximately sixteen (16) 12-inch diameter creosote timber piles associated with the existing timber retaining wall will be removed from the shoreline along the north end of the bulkhead wall. The existing creosote-treated timber retaining wall to the north of the bulkhead will be completely removed. The associated piles will be removed by either pulling them out using a chain or with a vibratory hammer depending on the Contractors preferred means and methods. The piles will be cut at the mudline if complete removal is not possible or the piles break during removal.

The 350 sf/14 cy of concrete rubble shore protection removed from the south portion of the project to accommodate installation of the new bulkhead will be replaced with approximately 35 cy of riprap in the same 350 sf area to maintain slope stability (Table 1). Of the 35 cy placed along the shoreline, 30 cy occurs below the HTL (Table 1).

One hundred ninety-eight (198) cy (2,200 sf) of riprap, 172 cy (1850 sf) of which occurs below the HTL, will be placed on the embankment to the north of the new bulkhead to replace the existing creosote treated timber retaining wall and provide shore protection (Table 1). The rip rap slope protection will serve as grade transitions from the vertical bulkhead structure to the adjacent sloped shorelines to the north and south. A layer of fish mix rock will be placed over the riprap located below HTL to provide fish habitat. The embankment height will be increased to an elevation of approximately +14.0 feet, MLLW between the bulkhead and the marina access pier to the east. The purpose of the increased embankment height is to mitigate the effects of sea level rise.

Paving and Grading

Upland paving and grading will be completed behind the bulkhead wall to mitigate sea level rise following construction of the new bulkhead. The driveway will be regraded and repaved with structural fill base course and asphalt pavement. This will consist of 8,000 sf of asphalt repaving. The upland area will be re-graded and re-paved to maintain positive drainage away from the Safe Coast Seafoods buildings. The bulkhead will be outfitted with scuppers to allow rainwater to flow into the marina rather than pooling along the driveway or draining toward the Safe Coast facilities.

Fill Impacts and Creosote Removal

Approximately twenty eight (28) creosote-treated timber piles (12-inch diameter) and three (3) steel piles (12-inch diameter) will be removed adjacent to the existing bulkhead and as part of the north shoreline rehabilitation. In addition, the Port proposes to remove approximately thirty-six (36) 12-inch diameter derelict creosote- treated timber piles and 3 creosote-treated timber pile caps as mitigation for the fill and benthic habitat impacts created by the placement of the new bulkhead wall in front of the existing structure. This will result in approximately 64 total creosote-treated timber piles and 3 steel piles being removed along with approximately 70 If of creosote treated timber retaining wall, and 40 If of creosote treated timber pile caps.

A derelict timber structure approximately 2,510 sf in area will be removed as part of the mitigation for project impacts. This will result in decreasing overwater coverage in the south portion of the marina at the location of the existing derelict timber structure.

Approximately 1,400 sf of fill below the HTL will result from the placement of the new bulkhead and drainage rock backfill (Table 1). Of the overall footprint, 1,000 sf will come into contact with the bottom substrate and result in benthic habitat impacts.

North shoreline riprap placement will occur in a 2,200 sf area, 1,850 sf of which occurs below the HTL and would result in benthic habitat impacts (Table 1). Approximately 750 sf of this will occur waterward of the existing retaining wall. A 6-inch layer (approximately 34 cy) of fish mix gravel will be placed below HTL to provide beach nourishment and improved habitat for fish passing through the marina.

South shoreline riprap placement will not result in any additional benthic habitat impacts (Table 1). The removal of approximately sixty-four (64) 12-inch creosote-treated timber piles, three (3) 12-inch steel piles, 70 If of timber retaining wall, and 40 If of derelict creosote-treated timber pile caps, will restore approximately 165 sf of benthic habitat (Table 1) and remove approximately 34 tons of creosote from the marine environment.

Table 1. Approximate Fill Impacts

Activity	Fill below HTL (sf)	Fill below HTL (cy)	Fill above HTL (sf)	Fill above HTL (cy)			
Bulkhead wall and shoreline protection installation							
Sheetpile installation	400 sf	80 cy	0 sf	0 cy			
Bulkhead drainage rock placement	1,000 sf	450 cy	0 sf	0 cy			
Rip-rap shore protection and Fish Mix placement (north shoreline)	1,850 sf	172 cy	350 sf	26 cy			
Concrete rubble removal (south shoreline)	-350 sf	-14 cy	-50 sf	-2 cy			
Rip-rap replacement (south shoreline)	350 sf	30 cy	50 sf	5 cy			
Subtotal	3,250 sf	718cy	350sf	29cy			
Structure removal							
Pile removal adjacent to existing bulkhead	-12 sf	-6 cy	0 sf	0 cy			
North shoreline- retaining wall removal	-85 sf	-12 cy	0 sf	0 cy			
Derelict pile/timber removal	-68 sf	-12 cy	0 sf	0 cy			
Derelict Timber structure/debris removal – South Marina	-2,510 sf	-350 cy	0 sf	0 cy			
Subtotal	-2,675 SF	-380 cy	0 sf	0 cy			
Creosote removal from the Environment	34 tons						

See the attached JARPA and JARPA sheets for additional Project description information.

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 Project occurs at the Port of Ilwaco on the southwest coast of Washington State, located just inside the Columbia River bar at the Pacific Ocean. The Port area generally consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard. The Project site at the Port of Ilwaco is the bulkhead along the east side of the commercial fishing wharf (herein referred to as 'wharf') occupied by Safe Coast Seafoods. The approximate coordinates of the of the Project site are latitude 46.30498 and longitude -124.0408.

The wharf is an earth filled structure on the east side and pile supported on the west side. The wharf is protected by a timber bulkhead along the eastern limits of the wharf. To the north of the bulkhead wall, the shoreline is protected by a low creosote-treated timber retaining wall and large log. To the south of the bulkhead wall, shoreline protection consists of riprap and concrete rubble. The Safe Coast Seafoods buildings are located on the wharf. The Port and marina area is protected by a rubble breakwater.

B. Environmental Elements [HELP]

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1.	Earth	ıne	ומו	

a. General description of the site:

(circle one):	Flat, rolling,	hilly, steep	slopes, mount	ainous, other	
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b. What is the steepest slope on the site (approximate percent slope)?

The Project is located in-water and along the shoreline at an existing bulkhead wall and riprap shoreline. The bulkhead wall is located in a gradually sloping soft bottom habitat.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The Project is located in-water and along the shoreline. The predominant soil types are sandy silt and silt (GeoEngineers 2023).

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

Pavement settlement has been observed on the adjacent landward driveway and bulkhead movement measured during monthly monitoring (late 2022/early 2023) and access is now restricted based on those conditions and the condition of the deteriorating bulkhead. The 2022 geotechnical investigations (GeoEngineers, 2023) indicate that the project site is underlain by liquefiable soil.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Installation of the bulkhead wall, drainage rock, and riprap will result in approximately 3,250 sf of fill in marine waters (measured below the high tide line [HTL]). Approximately 1,000 sf of the fill would come into contact with the bottom substrate and result in permanent impacts to the existing aquatic soft bottom habitat.

Fill and benthic habitat impacts are anticipated to be offset by the removal of steel piles, and creosote-treated wood (piles, structures, and revetment), and floating debris from the marine environment and placement of a layer of fish mix over the riprap shore protection to be placed at the head of the slip as beach nourishment. The removal of approximately sixty-four (64) 12-inch creosote timber piles, three (3) 12-inch steel piles, 70 If of timber retaining wall, 2,510 sf of floating timber debris and 40 If of derelict timber pile caps, will restore approximately 2,675 sf of benthic habitat and remove approximately 890 cy or 34 tons of creosote from the marine environment (Table 8e). The removal of creosote-treated wood is anticipated to provide both water quality and benthic habitat improvements. A layer of fish mix rock/gravel (approximately 34 cy) will be placed over the portion of riprap placed below the HTL at the head of the slip to improve habitat and provide beach nourishment to that portion of shoreline. No additional mitigation is anticipated to be required and a mitigation plan has not been developed. See the attached Biological Evaluation, Section 1.3.4, and JARPA, Table 8e for additional information on fill impacts.

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

Regrading and repaving the drive behind the bulkhead will be completed as part of the project. Proper best management practices (BMPs), such as silt fence and/or straw wattles will be used to provide a physical barrier to avoid and minimize erosion and prevent construction debris from entering nearby marine surface waters. The completed project will restore existing pavement and ongoing use will not result in erosion potential. The proposed Project will stabilize the wharf and improve shoreline stability to the north and south of the bulkhead.

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

Upland repaving and regrading will be completed behind the bulkhead wall to mitigate sea level rise. The driveway will be regraded and repaved with structural fill base course and asphalt pavement. This will consist of 8,000 sf of asphalt repaving. The repaving will be completed in an a currently paved area except where the new drain rock will be placed between the new and existing bulkheads. There will be an increase to existing impervious surfaces of approximately 1,250 sf that includes the new bulkhead cap and the paved area surfacing the area between the existing bulkhead and the new bulkhead to accommodate regrading of the access driveway adjacent to the bulkhead.

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

Not applicable. The Project is not anticipated to contribute to erosion.

2. Air [help]

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

The project will return normal operations along the driveway, bulkhead and marina slip adjacent to the bulkhead. Commercial fishing vessels, recreational vessels, employee vehicles and delivery trucks will continue to access the site.

Construction

Short-term construction-related air quality impacts and emissions could include dust from pavement work, which could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter (PM) during repaving/regrading the adjacent drive. Construction activities will require the use of diesel-powered vessels and trucks, and other equipment such as generators and compressors. This equipment would emit air pollutants that could slightly degrade local air quality in the immediate vicinity of construction activities. These emissions would be temporary and localized. Some construction activities could also cause odors detectable to some people in the vicinity of the activity, especially during pavement repair operations. Such odors would be short-term and localized.

Operations and Maintenance

Maintenance and rehabilitation of the existing infrastructure will reestablish operational efficiency and will allow accommodation of the intended vessel traffic for which the terminal was originally approved and operated. This project does not expand the operational footprint of the seafood facility or marina nor does it result in an increase in vessel traffic relative to previous operations.

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

There are no off-site sources of emissions or odors that may affect the Project.

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

Impacts from elevation emissions are anticipated to be minimal and short-term. Measures to reduce emissions are not proposed.

- 3. Water [help]
- a. Surface Water: [help]
 - 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 Project is located at the Port of Ilwaco Marina in Baker Bay near the mouth of the Columbia River.

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 occurs in-water and along the shoreline of Baker Bay within the Ilwaco Marina. See the project description in the Question 11 response and the attached JARPA and JARPA sheets.

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.

See 1e above. Installation of the bulkhead wall, drainage rock and riprap will result in approximately 3,050 sf of fill in marine waters (measured below the HTL). Approximately 1,200 sf of the fill would come into contact with the bottom substrate and result in permanent impacts to the existing aquatic soft bottom habitat.

Derelict creosote piles and structures present in the adjacent slip will be removed, restoring 165 sf of benthic habitat and removing approximately 20 tons of creosote from the marine environment which will improve the habitat conditions of the marina and lift its value from current conditions. The creosote treated timber revetment and debris present at the head of the adjacent slip will be removed and riprap will be placed as shore protection associated with raising the elevation of the top of the slope as part of sea level rise resilience. The north slip riprap area will be surface with fish mix rock to improve the habitat over the area of new riprap placed from the HTL down.

Additionally, floating timber debris will be removed from the south portion of the marina as part of proposed project mitigation. This will remove approximately 2,510 sf of overwater coverage present in that portion of the marina.

Fill and benthic habitat impacts are anticipated to be offset by the removal of steel piles, and creosote-treated wood (piles, structures, and revetment), and floating debris from the marine environment and placement of a layer of fish mix over the riprap shore protection to be placed at the head of the slip as beach nourishment. The removal of approximately sixty-four (64) 12-inch creosote timber piles, three (3) 12-inch steel piles, 70 If of timber retaining wall, 2,510 sf of floating timber debris and 40 If of derelict timber pile caps, will restore approximately 2,675 sf of benthic habitat and remove approximately 380 cy or 34 tons of creosote from the marine environment (Table 8e). The removal of creosote-treated wood is anticipated to provide both water quality and benthic habitat improvements. A layer of fish mix rock/gravel (approximately 34 cy) will be placed over the portion of riprap placed below the HTL at the head of the slip to improve habitat and provide beach nourishment to that portion of shoreline. No additional mitigation is anticipated to be required and a mitigation plan has not been developed.

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

No, the Project will not require surface water withdrawals or diversions.

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

Yes. The Project occurs at the Port of Ilwaco on the north shore of Baker Bay near the mouth of the Columbia River. See the attached JARPA sheets.

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.

There will be no discharge of waste materials to surface waters. Please see the avoidance and minimization measures (AMMs) and Best Management Practices (BMPs) in the attached Biological Evaluation and JARPA.

- b. Ground Water: [help]
 - 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.
 - No. Groundwater will not be withdrawn for drinking water or other purposes.
 - 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.

Waste material will not be discharged into the ground.

c. Water runoff (including stormwater):

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

The Project only proposes the replacement of a bulkhead wall, repair of slope protection, and paving and grading the upland wharf area. The driveway will be regraded and repaved with structural fill base course and asphalt pavement. This will consist of 8,000 sf of asphalt repaving. The upland area will be re-graded and re-paved to maintain positive drainage away from the Safe Coast Seafoods buildings. The bulkhead will be outfitted with scuppers to allow rainwater to flow into the marina rather than pooling along the driveway or draining toward the Safe Coast facilities.

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

No. Waste materials would not enter ground or surface waters. Please see the AMMs and BMPs in the attached JARPA and Biological Evaluation.

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

See c.1) above. The upland area will be regraded and repaved to maintain positive drainage away from the Safe Coast Seafoods buildings. Scuppers will be added to the new bulkhead to allow stormwater to drain off of the adjacent drive, away from the Safe Coast buildings. Existing stormwater drains off the drive via sheetflow.

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

Please see the AMMs in the attached JARPA and Biological Evaluation.

- 4. Plants [help]
- a. Check the types of vegetation found on the site:

deciduous tree: alder, maple, aspen, other
evergreen tree: fir, cedar, pine, other
X_shrubs (head of the adjacent slip)
X_grass (head of the adjacent slip)
pasture
crop or grain
Orchards, vineyards or other permanent crops.
wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
water plants: water lily, eelgrass, milfoil, other
other types of vegetation

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

Vegetation and terrestrial habitat conditions are limited within the Project area. The site is in an industrial area and is largely devoid of terrestrial vegetation. The Project would occur on an

existing wharf and associated bulkhead wall, retaining wall, and riprap shoreline. Little to no terrestrial and riparian habitat occurs here. The mudline at the base of the existing bulkhead is largely unvegetated and consists of a silty sand, sandy silt slope with riprap extending on the shore slope to the north and south of the bulkhead.

The upland area adjacent to the bulkhead is a paved driveway servicing the Safe Coast Seafood facility. Existing vegetation that could be removed or impacted by the Project consists of short-statured ruderal species behind the existing bulkhead wall and in viable spaces along the riprap shoreline. Upland vegetation observed along the shoreline during a 2022 site survey included clover species (*Trifolium species*), Japanese knotweed (*Polygonum cuspidatum*), various grasses, dandelion (*Tatxasum officinale*), and creeping buttercup (*Ranunculus repens*) (Geoengineers 2022).

A 2022 eelgrass survey was completed and observed that there is no eelgrass on or adjacent to the project site (GeoEngineers 2022). Eelgrass beds exist within the marina area, but do not occur within the Project footprint (GeoEngineers 2022). The eelgrass bed is not anticipated to be impacted by the proposed Project and is likely ephemeral in nature since the marina is periodically dredged for maintenance dredging under a separate permit. No wetlands or streams were identified within the marina.

- c. List threatened and endangered species known to be on or near the site. No threatened and endangered plant species were observed on our near the site. Vegetation and terrestrial habitat conditions are limited within the Project area. The site is in an industrial area within an active marina that serves recreational boating and commercial fishing vessels and is largely devoid of terrestrial vegetation. The Project would occur on an existing wharf and associated bulkhead wall, retaining wall, and rip rap shoreline. Little to no terrestrial and riparian habitat occurs here. The mudline at the base of the existing bulkhead is largely unvegetated and consists of a silty sand, sandy silt slope with rip rap extending on the shore slope to the north and south of the bulkhead. The upland adjacent to the bulkhead is a paved driveway servicing the Safe Coast Seafood facility. Existing vegetation consists of short-statured ruderal species behind the existing bulkhead wall and in viable spaces along the rip rap shoreline. Upland vegetation observed along the shoreline during a 2022 site survey included clover species (Trifolium species), Japanese knotweed (Polygonum cuspidatum), varios grasses, dandelion (tatxasum officinale), and creeping buttercup (Ranunculus repens) (GeoEngineers 2022).
- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Little to no terrestrial and riparian habitat occurs here. Vegetation that occurs within the project area and could be impacted during construction mainly consists of invasives. Substantial impacts to vegetation are not anticipated and measures to preserve or enhance vegetation are not proposed.

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

Japanese knotweed (*Polygonum cuspidatum*), dandelion (tatxasum officinale), and creeping buttercup (*Ranunculus repens*) are known to occur at the site.

5. Animals [help]

a. <u>List</u> any birds and <u>other</u> animals which have been observed on or near the site or are known to be on or near the site.

Examples include: See bold

birds: hawk, heron, eagle, **songbirds**, other: mammals: deer, bear, elk, beaver, other:

fish: bass, **salmon**, **trout**, herring, shellfish, other _____

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

The species in the table below have the potential to occur within the Project vicinity. See the attached Biological Evaluation for additional information.

ESA-Listed Species with Potential to Occur Within the Project Action Area

Species	ESU/DPS	Scientific Name	Agency	Federal Status	Critical Habitat
Chinook	Lower Columbia River ESU	Oncorhynchus	NMFS	Threatened	Occurs in
Salmon	Snake River fall-run ESU	tshawytcha		Threatened	Project Area
	Snake River spring/summer-run ESU			Threatened	
	Upper Columbia River spring- run ESU			Endangered	
	Upper Willamette River ESU			Threatened	
Chum Salmon	Columbia River ESU	O. keta	NMFS	Threatened	Occurs in Project Area
Coho Salmon	Lower Columbia River ESU	O. kisutch	NMFS	Threatened	Occurs in Project Area
Sockeye Salmon	Snake River ESU	O. nerka	NMFS	Endangered	Occurs in Project Area
Steelhead	Lower Columbia River DPS	Onocorhynchus	NMFS	Threatened	Occurs in
	Middle Columbia River DPS	myskiss		Threatened	Project Area
	Snake River Basin DPS			Threatened	
	Upper Columbia River DPS			Threatened	
	Upper Willamette River DPS			Threatened	
Green sturgeon	Southern DPS	Acipenser medirostris	NMFS	Threatened	Occurs in Project Area
Eulachon	Southern DPS	Thaleichthys pacificus	NMFS	Threatened	Occurs in Project Area
Sea turtles	Leatherback	Dermochelys coriacea	NMFS	Endangered	None in Project Area
Killer Whale	Southern Resident	Orcincus orca	NMFS	Endangered	None in Project Area

Species	ESU/DPS	Scientific Name	Agency	Federal Status	Critical Habitat
Humpback Whale	Central America DPS	Megaptera novaeangliae	NMFS	Endangered	None in Project Area
	Mexico DPS			Threatened	None in Project Area
Bull Trout	N/A	Salvelinus confluentus	USFWS	Threatened	None in Project Area
Western Snowy Plover	N/A	Charadrius nivosus nivosus	_	Threatened	None in Project Area
Marbled Murrelet	N/A	Brachyramphus marmoratus	USFWS	Threatened	None in Project Area
Streaked Horned Lark	N/A	Eremophila alpestris strigata	USFWS	Threatened	None in Project Area

The following Washington Department of Fish and Wildlife Priority Habitats and Species could occur in the Project vicinity.

- Coho Salmon (*Oncorhynchus kisutch*)
- Winter Steelhead (Oncorhynchus mykiss)
- Fall Chum (Oncorhynchus keta)
- Fall Chinook (Oncorhynchus tshawytscha)
- Marbled Murrelet (Brachyramphus marmoratus)
- Shorebird concentrations
- Waterfowl concentrations
- Wetlands
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Purple martin (*Progne subis*)

See the attached JARPA and Biological Evaluation for additional information.

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

Yes. Salmonids could use the Project vicinity during their migrations. In-water work will comply with the in-water work window for the area to avoid key migration times.

Baker Bay and the lower Columbia River are situated within the Pacific Flyway which supports a variety of migratory birds. The Pacific Flyway includes the entire west coast of North America reaching from northern Alaska and Canada to the southern tip of Mexico.

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

Avoidance and minimization measures (AMMs) and BMPs will be implemented during construction to avoid and/or minimize impacts to wildlife. See the attached JARPA and Biological Evaluation for a full list of measures to preserve or enhance wildlife. Key AMMs/BMPs include:

 In-water construction activities will comply with the in-water construction window (anticipated to be November 1 through February 28)

- During any in-water and embankment work, containment booms will be used to surround the work areas or separate embankment work from surface water.
- Steel piling will be installed with a vibratory hammer when possible. Impact hammering
 will start with light tapping, then increase to full force gradually.
- A bubble curtain and one or more other noise attenuation methods will be used during impact installation or proofing of all steel piling.
- e. List any invasive animal species known to be on or near the site.

There are no known invasive animal species that occur at or near the site.

- 6. Energy and Natural Resources [help]
- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The Project does not propose structures that will use energy into the future, however energy (fuel) will be consumed during demolition to operate equipment.

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

No. The Project would not affect potential use of solar energy.

c. What kinds of energy conservation features are included in the plans of this proposal?

List other proposed measures to reduce or control energy impacts, if any:

Not applicable. Energy use is anticipated to be minimal and short-term. Energy conservation measures are not proposed.

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

A portion of the creosote-treated timber bulkhead, all of the creosote treated timber revetment and associated structures, and other creosote-treated structures (to be removed from the adjacent slip for mitigation) will be removed. While creosote-treated piles are being removed, a containment boom will surround the work area to contain and collect any floating debris and sheen. Debris will be retrieved and disposed of properly. See the full list of AMMs/BMPs in the attached JARPA and Biological Evaluation that would be implemented during creosote structure removal.

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

Creosote-treated timber structures are present at the site.

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

Creosote-treated timber exists within the Project area. No other hazardous chemicals or conditions are known to occur.

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

The Project proposes to remove creosote treated wood from the marine environment. Please see the attached JARPA and Biological Evaluation for a discussion on the minimization measures proposed for creosote treated wood removal.

- **4)** Describe special emergency services that might be required. Special emergency services are not anticipated to be required.
- 5) Proposed measures to reduce or control environmental health hazards, if any: Measures will be implemented to reduce the risk of creosote exposure during creosote-treated wood removal. Please see the attached JARPA and Biological Evaluation for a discussion on the minimization measures proposed for creosote treated wood removal.

b. Noise

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

In-water construction noise sources include pile driving and the use of barge and boats. Above water construction include the use of a powered hand tools, barge, and tugboat. Please see Section 2.3 of the attached Biological Evaluation for additional information.

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)? Indi-cate what hours noise would come from the site.

Project noise will be short-term and limited to daylight hours. In-air pile driving noise could reach up to 105 A-weighted decibels (dBA). In-water pile driving noise could reach up to 170 dB root mean square (rms).

The marina is a seasonally busy commercial fishing and recreation marina. The project will not change the use of the marina and no longterm changes to noise are anticipated.

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

The proposed project will comply with City of Ilwaco noise ordnance 8.18.050.I limiting construction work between 7AM and 630PM Monday through Saturday and between 9AM and 5PM on Sundays.

The following measures would be implemented to reduce potential noise impacts:

- Steel piling will be installed with a vibratory hammer when possible. Impact hammering
 will start with light tapping, then increase to full force gradually.
- A bubble curtain and one or more other noise attenuation methods will be used during impact installation or proofing of all steel piling.
- Pile-driving will commence with a soft start procedure (ramping up) in order to alert nearby wildlife, allowing them to move out of the area prior to construction activities. For impact pile driving, contractors will be required to provide an initial set of strikes from the hammer at reduced percent energy, each strike followed by no less than a 30-second waiting

period. This procedure will be conducted a total of two times before impact pile driving begins.

 Use of a wood cushion block or other sound-reducing method shall be implemented if impact pile driving is to be employed. The use of wood cushion blocks during construction will result in a reduction in underwater noise.

8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The Project vicinity generally consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard. The Project site is located at a commercial fishing wharf. The Project will return use of the wharf for temporary mooring for offloading and loading of equipment and product for the Safe Coast Seafoods facility. The completed Project will also return access to the adjacent driveway. The adjacent driveway access is currently strictly controlled and limited due to load limitations resulting from the poor condition of the existing bulkhead.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No. The Project site has not been used as working farmlands or working forest lands.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

Not applicable. The Project is not located near a farm or forest.

c. Describe any structures on the site.

The Project vicinity generally consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard. The Project site is located at a commercial fishing wharf (herein referred to as 'wharf'). The wharf is an earth filled structure on the east side and pile supported on the west side. The wharf is protected by a timber bulkhead (to be replaced) along the eastern limits of the wharf. The Port of Ilwaco Marina is located waterward of the existing bulkhead. To the north of the bulkhead wall, the shoreline is protected by a low creosote-treated timber retaining wall and large log. To the south of the bulkhead wall, shoreline protection consists of riprap and concrete rubble. The Safe Coast Seafoods buildings are located on the wharf.

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

The following structures will be removed:

- Portions of existing creosote-treated timber bulkhead
- The creosote-treated timber retaining wall and associated treated timber debris
- Derelict creosote-treated piles and cross-members located in the slip next to the bulkhead

- Concrete rubble to the south of the bulkhead will be removed and replaced with riprap to accommodate construction of the bulkhead
- A floating timber structure will be removed from the south portion of the marina as part of project mitigation.
- e. What is the current zoning classification of the site?

The Project is located within an area zoned as light industrial and adjacent to areas zoned as low density commercial (City of Ilwaco 2022).

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

The Project is located within an area zoned as light industrial and adjacent to areas zoned as low density commercial (City of Ilwaco 2022).

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

The upland areas are designated as 'high intensity'. Areas waterward of the ordinary highwater mark (OHWM) are designated as 'aquatic'.

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

The Project occurs in an area that is designated as a Fish and Wildlife Conservation area.

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

Zero. People will not work or reside in the completed Project.

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

Zero. People would not be displaced by the Project.

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

None. No displacement impacts would occur.

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

No measures are proposed. The Project would be compatible with existing land uses without additional measures.

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

No measures are proposed. The Project would not impact agricultural or forest lands.

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

Zero.

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

Zero.

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

No measures are proposed. The Project would not result in housing impacts.

10. Aesthetics [help]

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

The replacement bulkhead will be raised approximately 3 feet to accommodate sea level rise. The total height above HTL is 4.3 feet. The top of slope along the head of the adjacent slip will be raised approximately 1.5 feet to +14 feet MLLW.

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

Views are not anticipated to be impacted. As stated above, the top of the replaced bulkhead wall will be at elevation 14 ft MLLW, 4.3 feet above the HTL. The increase to the top of slope at the head of the slip to 14 feet MLLW is not anticipated to impact any views as the adjacent properties are used by commercial businesses and the increase of approximately 1.5 feet is not anticipated to adversely alter views from the businesses.

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

No measures are proposed. The Project is not anticipated to result in adverse impacts to aesthetics. The Project could provide aesthetic benefits by removing derelict structures.

11. Light and Glare [help]

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

Construction will occur during the daylight hours. Changes to longterm wharf lighting is not proposed.

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

No. Lighting is not proposed.

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 may affect the Project.

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

No measures are proposed. The Project is not anticipated to result in light or glare impacts.

12. Recreation [help]

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

The Port of Ilwaco marina is used for recreational activities such as boating, in addition to commercial uses.

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

The Project could temporarily disturb use of the adjacent Port of Ilwaco Marina during construction. However, impacts are anticipated to be minor, localized to the immediate area around the proposed activities, and the Project would not restrict use of the marina. Additionally, work will be completed Fall and Winter of the 2024/ 2025 season (work window for in-water work is limited to November 1 through February 28) which will avoid disruptions during the busy summer fishing season.

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

Substantial impacts to recreation are not anticipated and therefore no measures are proposed to reduce impacts. The bulkhead replacement would prevent the shoreline from falling into a portion of the active Port of Ilwaco Marina, which would impact operations and recreation at the marina.

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

In 1968, the filling in of the former tidelands made the former Pioneer Packing Company cannery platform into a peninsula at the northwest corner of the mooring basin (USC&GS 1968;USGS 1969). The former Pioneer Packing Company cannery became Jessie's Ilwaco Fish Company in 1961, and the property is now home to Safe Coast Seafoods.

A cultural resources and historic and built environment assessment was completed for the Project and it was determined that there are no known archaeological resources within the Project area (WillametteCRA 2022) and that the adjacent seafood buildings should not be eligible for listing in the National Registry for Historic Places based on a lack of integrity of design, materials and workmanship (processing building)and/or age of the building (south building) (Willamette CRA 2023).

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

No. A cultural resource and historic and built environment assessment was completed for the Project (WillametteCRA 2022 and 2023).

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

The following resources were reviewed by WillametteCRA as part of the cultural resource and historic built environment assessment completed for the Project (WillametteCRA 2022 and 2023 [Technical Addendum]):

- Documents on file with the Washington Department of Archaeology and Historic Preservation (DAHP) and the Oregon State Historic Preservation Office (SHPO) to determine if archaeological resources have been recorded in the Project vicinity, and to identify any previous archaeological studies in the area
- Copies of historical maps and records to assess the potential for historic-period archaeological resources in the Project vicinity
- Historic photographs and newspaper articles related to the Port at the Columbia Pacific Heritage Museum in Ilwaco
- A reconnaissance-level assessment of the current study area and archival research on 27 April 2022

- An aboveground resource survey, formally documenting the East Bulkhead on 10 June 2022.
- A Historic Property Inventory (HPI) form
- Site survey of upland buildings completed 12 April 2023
- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Impacts to historic and cultural resources are not anticipated. If archaeological materials or human remains be observed during Project activities, all work in the immediate vicinity shall stop and DAHP, the County planning office, and the affected Tribe(s) would be contacted.

14. Transportation [help]

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

The Project will mainly be completed from the water. Trucks may occasionally be used to transport materials.

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The geographic area is currently served by public transit. The nearest bus stop is approximately 0.1 miles from the Project site.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

Zero. The Project does not propose to eliminate or construct parking spaces.

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

Improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways are not proposed. The existing private driveway will be regraded and repaved with structural fill base course and asphalt pavement. Upland paving and grading will then be completed behind the bulkhead wall to repair damage associated with bulkhead movement and driveway settlement and to mitigate sea level rise.

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

The maintenance and repair project will be completed on the east side of the Safe Coast Seafoods wharf adjacent to an Ilwaco Marina slip. The seafood facility is a busy seafood processing facility that processes fish products delivered by vessel and trucks. The marina is a seasonally busy small marina serving commercial fishing and recreation vehicles.

Maintenance and rehabilitation of the existing infrastructure will reestablish operational efficiency and will allow accommodation of the intended vessel and vehicle traffic for which bulkhead and adjacent drive were originally approved and operated. The project does not expand the operational footprint of the of the wharf or the marina nor result in

an increase in vessel or vehicular traffic relative to previous operations.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?
 - The Project will mainly be completed from the water. There may be occasional vehicular trips associated with construction activities, however these have not been quantified.

The vehicular and vessel traffic to and from the site after project completion will remain the same as existing conditions.

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

No. The Project will not impact the movement of agricultural and forest products on roads or streets. Transportation impacts have not been identified.

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

No measures are proposed. Transportation impacts have not been identified.

- 15. Public Services [help]
- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No. The Project does not propose the construction of new structures that could require an increased need for public services.

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

No measures are proposed. Public service impacts have not been identified.

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16.	ITTITIOS	Indin
10.	Utilities	[help

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

Utilities do not service the structures that would be affected by this Project.

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

No utilities are proposed.

C. Signature	[HELP]
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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:	France	1 on	
Name of signee _	Tracy	Lo) strom	
Position and Age	ncy/Organization	Minager,	Hort of Twee
Date Submitted:	6/30/23	d	

Responsible Official:

Holly Beller, City Administrator 120 First Avenue Ilwaco, WA 98624 360-642-3145

treasurer@ilwaco-wa.gov

Signature: Date: November 8, 2023

COMMENT PERIOD: In accordance with WAC 197-11-340, there is a fourteen-calendar day comment period for this Determination of Non-significance. Comments on the DNS addressing environmental issues shall be submitted to the City of Ilwaco Building and Planning Department at the address below.

APPEALS: Appeals to the above Determination of Non-Significance must be filed with the City of Ilwaco Building and Planning Department within fourteen calendar days of the date of issuance above. Appeals must be filed in writing with the City of Ilwaco Building and Planning Department at the address below. In accordance with IMW 15.50.140, Decisions of the hearing examiner may be appealed to the Pacific County Superior Court in accordance with Section 15.08.160 of this title. Appeals shall set forth the specific reason, rationale, and/or basis for the appeal.

PORT OF ILWACO

Marine Structures Replacement *Ilwaco, WA*

Appendix A11

City of Ilwaco SCUP and Ecology SCUP No. 2024-SWRO-7840 with City Staff Report



120 First Avenue North PO Box 548 • Ilwaco, WA 98624 Phone: 360.642.3145

Fax: 360.642.3155 planner@ilwaco-wa.gov www.ilwaco-wa.gov

Shoreline Substantial Development and Shoreline Conditional Use Permit

Permit No.: 2024-002 Issued: <u>February 6, 2024</u>

Project Location: 117 Howerton Avenue SE Ilwaco, WA 98624

Property Owner: Tracy Loftstrom, Port Manager, Port of Ilwaco

Applicant: Victoria England, Moffatt & Nichol

Project Description: Replace the failing east bulkhead with a sheetpile bulkhead, replace the slope protection to the north and south of the east bulkhead, and pave and regrade the upland wharf area directly landward of the east bulkhead.

Your application has been reviewed for compliance with all applicable policies and regulations. The following conditions of approval must be adhered to:

CONDITIONS OF APPROVAL

- 1. The permit shall not begin and is not authorized until twenty-one (21) days from the date of filing (February 6, 2024) as defined in RCW 90.58.140(6) and WAC 173-27-130, as amended, or until all review proceedings initiated within twenty-one (21) days from the date of such filings have been terminated, except as provided in RCW 90.58.140(5)(c) and (d).
- 2. All development must adhere to the recommendations included in the *Geotechnical Engineering Services Report* prepared by GeoEngineers dated October 4, 2023.
- 3. All local, state, and federal regulations are adhered to. Additional permits or authorizations from other agencies will be required, including, but not limited to, Washington Department of Fish and Wildlife, United States Army Corps of Engineers, Washington State Department of Ecology, and Washington State Department of Natural Resources Aquatic Resources Division.
- 4. Gravel, drainrock, and fish mix fill material shall be obtained from a state-authorized source in compliance with Shoreline Master Program Section 7.9(5).
- 5. Documentation must be provided that the mitigation measures have been implemented as proposed prior to the final inspection of the project.
- 6. The use or activity shall be commenced within two years of the effective date of this permit in compliance with WAC 173-27-090(2). The City may authorize a single extension for a period not to exceed one year based on reasonable factors, if a request for extension has been filed before the expiration date and notice of the proposed extension is given to parties of record.

- 7. Authorization to conduct development activities shall terminate five years after the effective date of the substantial development permit in compliance with WAC 173-27-090(3). The City may authorize a single extension for a period not to exceed one year based on reasonable factors, if a request for extension has been filed before the expiration date and notice of the proposed extension is given to parties of record.
- 8. Any and all future development on subject property requires permit approval from the City of Ilwaco.
- 9. The City of Ilwaco may revoke this permit if the permittee fails to comply with the conditions listed.
- 10. The undersigned may inspect the work authorized by this permit. The permittee shall provide unrestricted access to the construction site for inspection.
- 11. The City of Ilwaco reserves the right to amend or add conditions of approval, as necessary, to ensure that all local, state, and federal regulations are adhered to.

A copy of this permit, along with the approved site plan, shall be kept on the project site during construction and made available for inspection upon request by any City of Ilwaco representative. Any and all changes to the approved site plan will require additional review by the City of Ilwaco and may require additional fees for review. Questions regarding this permit can be addressed to Holly Beller, via email at treasurer@ilwaco-wa.gov, or by phone at (360) 642-3145.

BEFORE THE HEARING EXAMINER FOR THE CITY OF ILWACO

In the Matter of the Application of)	FILE NO: 2024-002
The Port of Ilwaco)	
Applicant/Owner, for a)	FINDINGS OF FACT,
Shoreline Substantial Development Permit)	CONCLUSIONS OF LAW
and Shoreline Conditional Use Permit)	AND DECISION

INTRODUCTION

The applicant proposes to replace the failing east bulkhead with a sheet pile bulkhead, replace the shoreline protection improvements to the north and south of the east bulkhead and pave and regrade the upland wharf area directly landward of the east bulkhead. The replacement bulkhead has been designed to accommodate future sea level rise projections to mitigate the effects of climate change and future flooding events. The subject property is located at 117 Howerton Avenue SE Ilwaco, WA 98624 and consists of parcels 73048003011, 73048003009 and 73031013000.

The applicant submitted application materials on July 6, 2023. The proposed project does not meet the threshold for a categorical exemption and therefore requires a SEPA determination pursuant to Washington Administrative Code (WAC) §197-11-800. The applicant submitted a SEPA Checklist with its application and the City published a Notice of Application in the Chinook Observer on August 9, 2023 and issued a Determination of Non-Significance (DNS) and posted the determination to the Department of Ecology SEPA Register on November 6, 2023.

After an initial review of the application materials, the City issued a determination of completeness on August 1, 2023. The proposal is subject to the requirements of the IMC §15.18, Critical Areas, and the City of Ilwaco Shoreline Master Program (SMP).

The application was heard before Charles E. Black, Hearing Examiner on January 4, 2024 at 11 AM PST. Following the call to order, the Hearing Examiner explained the hearing process and Laura Jones, on-call City Planner, presented the staff report. The applicant, the City Administrator and interested members of the public attended the hearing in person and via Zoom.

Based on the information presented during the hearing, contained in the staff report and in the administrative record, the Hearing Examiner makes the following:

FINDINGS OF FACT

- 1. The applicant submitted a complete SEPA checklist with their application, and the City timely issued a Determination of Non-Significance (DNS). No public comments were received during the Notice of Application comment period and the SEPA review for the project is complete.
- 2. No changes to the existing permitted use of the site as a seafood processing facility are proposed with this application. The development will be limited to replacement of existing shoreline stabilization structures and regrading/paving of the existing access road.
- 3. Pursuant to SMP Table 7.1, fill below the ordinary high-water mark (OHWM) requires a shoreline conditional use permit. Accordingly, a mitigation sequence analysis is required under §6.3(2)(B).
- 4. As described in the Mitigation Sequencing and No Net Loss Narrative prepared by Moffatt & Nichol on behalf of the applicant, mitigation sequencing was followed during the design of this project proposal and compensatory mitigation is anticipated to result in no net loss of shoreline ecological functions. Avoidance by taking no action was demonstrated to be infeasible as it was documented in the Geotechnical Engineering Report that the bulkhead is at risk of failure.

BEFORE THE HEARING EXAMINER FOR THE CITY OF ILWACO

Additional alternatives were considered but were deemed infeasible or inadequate. The project proposal has been minimized to the extent practicable. Avoidance and minimization measures, including BMPs, will be implemented throughout construction. The applicant has prepared a compensatory mitigation plan that enhances the aquatic environment compared to current conditions. Additional monitoring efforts are not expected to be necessary for this project proposal as outlined in the findings of SMP §6.3(4).

- 5. The Geotechnical Engineering Report prepared by GeoEngineers establishes that the bulkhead is in serious structural condition and at risk of failing. Frequent flooding due to high water levels from "king tides" and severe winter storm surges further threaten the structural capacity of the bulkhead. Softer alternatives are not feasible to protect the existing wharf and facilities.
- 6. The proposed mitigation to offset the expected project impacts include piling removal, removal of creosote from the aquatic environment, beach nourishment, and removal of floating timber debris/overwater coverage from the marine environment. Approximately twenty-eight (28) creosote treated timber piles (12-inch diameter) and three (3) steel piles (12-inch diameter) will be removed adjacent to the existing bulkhead and as part of the north shoreline rehabilitation. In addition, the Port proposes to remove approximately thirty-six (36) 12-inch diameter derelict creosote-treated timber piles and 3 creosote-treated timber pile caps as mitigation for the fill and benthic habitat impacts created by the placement of the new bulkhead wall in front of the existing structure. The removal of approximately sixty-four (64) 12-inch creosote-treated timber piles, three (3) 12-inch steel piles, 70 linear feet of creosote treated timber retaining wall, and 40 linear feet of derelict creosote-treated timber pile caps will restore approximately 165 square feet of benthic habitat and remove approximately 34 tons of creosote from the marine environment. Additionally, floating timber debris will be removed from the south portion of the marina as part of the project mitigation. This will remove approximately 2,510 square feet of overwater coverage currently present in that portion of the marina. The proposed compensatory mitigation was identified in consultation with federal and state agencies including additional coordination with the Washington Department of Fish and Wildlife to identify sufficient mitigation to address project impacts. No additional safeguard measures are expected to be needed provided that the mitigation plan is implemented as proposed.
- 7. The project proposal has been designed to ensure that there is no net loss of shoreline ecological function. The proposed fill placement and excavation activities have been minimized to the extent practicable. The proposal includes removal of creosote and concrete from the aquatic environment, removal of derelict overwater structures, and will include beach nourishment in the form of fish mix on top of the replaced shoreline stabilization at the head of the berth. The fill and excavation have been minimized to the extent practicable and are the minimum size necessary to protect the existing facilities and mitigate the future effects of sea level rise. The Geotechnical Engineering Report prepared by GeoEngineers includes an analysis that concludes that the proposed development actions will not increase the risk of slope failure anywhere along the project area.
- 8. Any conclusion of law deemed to be a finding of fact is adopted as such. From these findings of fact, the Hearing Examiner makes the following:

CONCLUSIONS OF LAW

1. The Hearing Examiner has jurisdiction over the subject matter of this proceeding.

BEFORE THE HEARING EXAMINER FOR THE CITY OF ILWACO

- 2. The proposed use in the proposed location will not be detrimental to other uses legally existing or permitted outright in the vicinity of the project nor will the proposed use likely stimulate additional requests for like actions in the area that may produce substantial adverse effects to the shoreline environment.
- 3. The other performance characteristics of the proposed use are compatible with those of other uses in the vicinity of the project.
- 4. The requirements of the Ilwaco Municipal Code have been met.
- 5. The proposed use and design are compatible with the other authorized uses of the Port of Ilwaco marina and any planned uses and with the existing structures.
- 6. Any finding of fact deemed to be a conclusion of law is adopted as such.

DECISION

The Shoreline Substantial Development Permit and Shoreline Conditional Use Permit are approved, subject to the following conditions:

- 1. The permit shall not begin and is not authorized until twenty-one (21) days from the date of filing as defined in RCW §90.58.140(6) and WAC §173-27-130, as amended, or until all review proceedings initiated within twenty-one (21) days from such date of filing have been terminated, except as provided in RCW §90.58.140(5)(c) and (d).
- 2. All development shall adhere to the recommendations included in the Geotechnical Engineering Services Report prepared by GeoEngineers dated October 4, 2023.
- 3. All local, state, and federal regulations shall be adhered to. Additional permits or authorizations from other agencies will be required, including, but not limited to, Washington Department of Fish and Wildlife, United States Army Corps of Engineers, Washington State Department of Ecology, and Washington State Department of Natural Resources Aquatic Resources Division.
- 4. Gravel, drain rock, and fish mix fill material shall be obtained from a state-authorized source in compliance with SMP §7.9(5).
- 5. Documentation shall be provided confirming that the mitigation measures have been implemented as proposed prior to the final inspection of the project.

Dated: January 7, 2024

Charles E. Black
Hearing Examiner
City of Ilwaco



STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Southwest Region Office

PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

February 6, 2024

Port of Ilwaco Tracy Lofstrom PO Box 307 Ilwaco, WA 98624

Re: City of Ilwaco Substantial Development Permit and Conditional Use Permit

No. 2024-002

Ecology Permit No. 2024-SWRO-7840

Dear Tracy Lofstrom:

On January 9, 2024, the Department of Ecology (Ecology) received notice that the City of Ilwaco (City) has approved with conditions your application for a Substantial Development Permit (SDP) and a Conditional Use Permit (CUP) to replace the failing east bulkhead with a sheetpile bulkhead, replace the slope protection to the north and south of the east bulkhead, and pave and regrade the upland wharf area directly landward of the east bulkhead. The project is located at 117 Howerton Avenue SE within a high intensity shoreline environment designation along Baker Bay.

By law, local governments must review all SDPs for compliance with:

- The Shoreline Management Act (Chapter 90.58 RCW),
- The SDP approval criteria (WAC 173-27-150), and
- The Ilwaco Shoreline Master Program.

Local governments, after reviewing SDPs for compliance, are required to submit them to Ecology. We have received your SDP.

By law, Ecology must review CUPs for compliance with:

- The Shoreline Management Act (Chapter 90.58 RCW),
- The CUP approval criteria (WAC 173-27-160), and
- The Ilwaco Shoreline Master Program.

After reviewing CUPs for compliance, Ecology must decide whether to approve, approve with conditions, or disapprove.

Port of Ilwaco February 6, 2024 Page 2

Our Decision on Your CUP:

We approve your CUP, provided your project complies with the conditions required by the City.

What Happens Next?

Before you begin activities authorized by these permits, the law provides a 21-day appeal period from February 6, 2024, the "date of filing." This appeal period allows anyone (including you) who disagrees with any aspect of this permit to appeal the decision to the state Shorelines Hearings Board (SHB). You must wait for the conclusion of an appeal before you can begin the activities authorized by this permit.

The SHB will notify you if they receive an appeal. We recommend that you contact the SHB before you begin permit activities to ensure they have not received an appeal. You may reach them at 360-664-9160, eluho@eluho.wa.gov, or Shorelines Hearings Board.

If <u>you</u> want to appeal this decision, you can find appeal instructions at <u>How to File a Petition for</u> <u>Review</u> or on the website of the Washington State Legislature at <u>Chapter 461-08 WAC</u>.

Please note, other federal, state, and local permits may be required in addition to these shoreline permits.

If you have any questions about this letter, please contact Zach Meyer at 360-481-9885 or Zachary. Meyer@ecy.wa.gov.

Sincerely,

Maria Sandercock Section Manager

Shorelands and Environmental Assistance Program

ec: Victoria England, Moffat & Nichol

Mario Santis

Alexandra Plumb, DCG Watershed

Holly Beller, City of Ilwaco

Zach Meyer, Department of Ecology



120 First Avenue North PO Box 548 • Ilwaco, WA 98624 Phone: 360.642.3145

Fax: 360.642.3155 info@ilwaco-wa.gov www.llwaco-wa.gov

DATE: December 14, 2023

TO: Ilwaco Hearing Examiner

CC: Tracy Loftstrom, Port Manager, Port of Ilwaco

FROM: Holly Beller and Alexandra Plumb

SUBJECT: Shoreline Substantial Development, Shoreline Conditional Use Permit, and SEPA

Determination

I. GENERAL INFORMATION

Applicant/Property Owner: Tracy Lofstrom (Port of Ilwaco Manager), PO Box 307, Ilwaco, WA 98624

Contact: Victoria England, Moffatt & Nichol, 600 University Street Suite #610, Seattle, WA 98101

Project Address/Location: 117 Howerton Avenue SE Ilwaco, WA 98624; Port of Ilwaco; Parcel(s) 73048003011, 73048003009 and 73031013000.

Public Notice: Public notice requirements are described below under State Environmental Policy Act (SEPA).

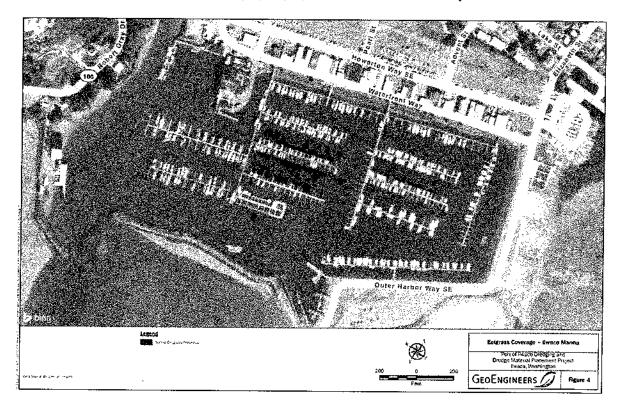
Proposal: The Port of Ilwaco proposes to replace the failing east bulkhead with a sheetpile bulkhead, replace the slope protection to the north and south of the east bulkhead, and pave and regrade the upland wharf area directly landward of the east bulkhead. The replacement bulkhead has been designed to accommodate for future sea level rise projections to mitigate the effects of climate change and future flooding events.

State Environmental Policy Act (SEPA): The proposed project does not meet the threshold for a categorical exemption and therefore requires a SEPA determination pursuant to Washington Administrative Code (WAC) 197-11-800. The applicant submitted a SEPA Checklist with their application. The City published a Notice of Application in the *Chinook Observer* on August 9, 2023. The City issued a Determination of Non-Significance (DNS) and posted the determination to the Department of Ecology SEPA Register on November 6, 2023. The SEPA Checklist and DNS are provided as Attachment B. Public comments received are referenced as Attachment C.

Shoreline Master Program (SMP): The subject properties are located within the High Intensity Shoreline Environmental Designation (SED). Below the Ordinary High Water Mark (OHWM) is designated as the Aquatic SED.

Critical Areas: The site is located within a Fish and Wildlife Habitat Conservation Area and is near mapped aquatic wetlands. An Aquatic Critical Areas Assessment and Macrovegetation/Eelgrass Survey is included as Attachment E. The purpose of this study was to document baseline habitat conditions (wetland, stream and estuarine macrovegetation) that may be affected by proposed project elements in accordance with Ilwaco Municipal Code (IMC) Chapter 15.18 (Critical Areas Ordinance) and according

to the City of Ilwaco's Shoreline Master Program (SMP) (IMC Chapter 15.14). Per WAC 220-110-250(3)(a,b), eelgrass and macroalgae are saltwater habitats of special concern and under Ilwaco Municipal Code (IMC) Chapter 15.14 are considered critical saltwater habitats. Native eelgrass is not expected to be directly impacted by the project proposal, as shown in the survey below.



Zoning: The subject property is zoned Light Industrial (M-1). "Food/seafood processing" is a permitted use in the M-1 district per Table 15.44.020 (Land Use Table) in the Ilwaco Municipal Code (IMC). No changes to the existing use are included with this proposal.

Attachments:

- A. Application Forms and Site Plans
- B. SEPA Checklist and DNS
- C. Public Comments
- D. Geotechnical Report
- E. Aquatic Critical Areas Assessment and Macrovegetation/Eelgrass Survey
- F. JARPA
- G. Mitigation and No Net Loss Narrative Memorandum
- H. Biological Evaluation
- I1. Letter from Department of Archaeology and Historic Preservation (DAHP)
- J. Updated Letter of Concurrence from USFWS and NOAA Fisheries

¹A Cultural Resources Assessment was submitted with the application materials but is not included in the attachments due to the confidential nature of the content included the report.

II. PROJECT INFORMATION

The Port of Ilwaco is requesting approval of a Shoreline Substantial Development Permit and Shoreline Conditional Use Permit to replace the failing east bulkhead with an anchored steel sheetpile bulkhead, repair the slope protection north and south of the bulkhead, and pave and regrade the upland wharf area near Safe Coast Seafoods. The applicant submitted application materials on July 6, 2023. After an initial review of the application materials, the City issued a determination of completeness on August 1, 2023. The City conducted SEPA review and issued a DNS on November 8, 2023. The proposal is subject to the requirements of the IMC 15.18, Critical Areas, and the City of Ilwaco Shoreline Master Program (SMP).

Figure 1: Zoning Area



Figure 2: Area of Proposed Development



III. GENERAL SITE INFORMATION

Zoning District	M-1 Light Industrial
Parcel Number(s) and Size	73048003011
	73048003009
	73031013000
Adjacent Land Uses	The surrounding land uses include the marina and businesses associated with the Port of Ilwaco.
Access Roads	Existing access to the site is gained from via Waterfront Way from Howerton Way SE. No changes to the location of the access road are proposed with this application. The proposal includes upgrades to the internal access road associated with Safe Coast Seafood facilities. The internal access road will be expanded and repaved to the edge of the new bulkhead and concrete cap. However, no work will occur within the public ROW. All proposed development will be located within the Safe Coast Seafoods property.
Existing Structures	The site currently contains Safe Coast Seafoods facilities and associated structural shoreline stabilization to support their temporary berthing operations and marina users.
Topography	The site is relatively flat with most of the work occurring in-water and along the shoreline. The geotechnical report submitted with the application materials includes more detailed information.
Existing Vegetation	The site is largely devoid of terrestrial vegetation as it is within a developed industrial area. Some upland vegetation may be

	impacted along the rip rap shoreline or behind the existing bulkhead wall.
Fish and Wildlife	The 2022 eelgrass survey indicated that there is no eelgrass on or
Habitat Conservation Areas	immediately adjacent to the project site. However, there are
The state of the s	polaross hade within other group of the marine. No streets were
	eelgrass beds within other areas of the marina. No streams were
	identified within the project site.
Frequently Flooded Areas	According to Federal Emergency Management Agency (FEMA)
	Flood Insurance Rate Map Panel 530127, the site is located within
	a Special Flood Hazard Area.
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Coolegically IX	Area of undetermined flood negratal Area FLOOD HAZARD Area with Flood flood doe to green area.
Geologically Hazardous Areas	The site is located in a seismic hazard area for ground shaking
	amplification (NEHRP Site Class D) and the risk of liquefaction is
	high. The geotechnical report indicates that the subject property is
	potentially underlain by liquefiable soils.
Wetlands	The project area is mapped as estuarine and marine wetlands.
	However, the Aquatic Critical Areas Assessment and
	Macrovegetation/Eelgrass Survey did not document any wetlands
	within the immediate project site.
Shoreline Environmental	Upland: High Intensity
Designation	In-water: Aquatic
Critical Aquifer Recharge	The site is underlain by <i>Udorthents</i> soils and is therefore within a
Areas	designated CARA.
	Hedigitated CANA.

IV. ILWACO MUNICIPAL CODE FINDINGS

Streets (IMC Chapter 14.04)

IMC 14.04.070(A)

A. Required minimum street right-of-way width is according to construction standards in the Pacific County Road standards.

Finding: The applicant is proposing improvements to the internal access road for the Safe Coast Seafoods facility that connects to Waterfront Way, a public road providing access to the site. However, all improvements will be made outside of the public right-of-way.

State Environmental Policy Act (IMC Chapter 15.12)

IMC 15.12.010 State Environmental Policy Act (SEPA).

- A. The city adopts the applicable sections of the State Environmental Policy Act (SEPA) Rules, Chapter 197-11 WAC, including amendments that became effective in November 1997, as the city of Ilwaco's environmental management ordinance.
- B. The city planner is named the responsible environmental official for the city, for purposes of administrating this title. (Ord. 627 (part), 1999)

Finding: The applicant submitted a complete SEPA checklist with their application, and the City issued a Determination of Non-Significance (DNS) on November 8, 2023. The public comment period concluded on December 10, 2023. Public comments received are included in Attachment C. The SEPA review for the project is complete. No comments were received during the Notice of Application comment period.

Critical Areas (IMC Chapter 15.18)

IMC 15.18.020 Development in critical areas.

A. Persons proposing development in critical areas must comply with the requirements of the U.S. Army Corps of Engineers, the U.S. Fish and Wildlife service, and the Washington State Department of Ecology, in addition to the regulations of this title.

Finding: On August 28, 2023, the applicant received a Letter of Concurrence from the U.S. Fish and Wildlife Service, as well as updated correspondence on September 6, 2023, documenting that the proposed changes lessen the impact and improve conditions compared to the initial proposal (Attachment J). Similarly, NOAA Fisheries provided a Letter of Concurrence on August 16, 2023, as well as updated correspondence on October 5, 2023, indicating that the proposed revisions do not change the determination in the Biological Evaluation that the proposed action is not likely to adversely affect salmon, steelhead, green sturgeon or eulachon, or critical habitat for these species (Attachment J). As a condition of approval, all local, state, and federal regulations must be adhered to. Additional permits or authorizations from other agencies will be required, including, but not limited to, Washington Department of Fish and Wildlife, United States Army Corps of Engineers, Washington State Department of Ecology, and Washington State Department of Natural Resources Aquatic Resources Division.

M-1 Light Industrial District (IMC Chapter 15.36)

IMC 15.36.020 Allowed uses.

Allowed uses in the M-1 district are listed in IMC Chapter 15.44.

Finding: There are no changes in the existing permitted use, a seafood processing facility, with this proposal. The proposal is to protect the existing facility by replacing the failing bulkhead.

Shoreline Master Program

SMP Section 6.3(1) No net loss of ecological functions.

Individual uses and developments shall not result in a net loss of shoreline ecological functions. Individual uses and developments are required to follow the mitigation sequence and mitigate environmental impacts not otherwise avoided or minimized by compliance with the City's Shoreline Master Program or other applicable regulations.

Finding: As described in the *Mitigation Sequencing and No Net Loss Narrative* prepared by Moffatt & Nichol on behalf of the Port of Ilwaco, mitigation sequencing was followed during the design of this project proposal and compensatory mitigation is anticipated to result in no net loss of shoreline ecological functions.

SMP Section 6.3(2) Mitigation sequence analysis, when required.

If a proposed shoreline use or modification is entirely addressed by specific, objective standards (such as setback distances, pier dimensions, or materials requirements) contained in the City's Shoreline Master Program, then the mitigation sequence analysis described in regulation 6.3(3) is not required. In the following circumstances, a project applicant must provide a mitigation sequence analysis as described in regulation 6.3(3):

- A. If a proposed shoreline use or modification is addressed in any part by discretionary standards (such as standards requiring a particular action "if feasible" or requiring the minimization of development size) contained in the City's shoreline regulations, then the mitigation sequence analysis is required for the discretionary standard(s).
- B. When an action requires a shoreline conditional use permit or shoreline variance permit.
- C. When specifically required by a provision in the City's Shoreline Master Program.

Finding: Pursuant to SMP Table 7.1, Shoreline uses, development and modifications, fill below the ordinary high water mark (OHWM) requires a shoreline conditional use permit. Therefore, a mitigation sequence analysis is required under Section 6.3(2)(B).

SMP Section 6.3(3) Mitigation Sequence Analysis

An applicant required to complete a mitigation sequence analysis pursuant to regulation 6.3(2) must describe how the proposal will follow the below mitigation sequence. Application of the mitigation sequence must achieve no net loss of ecological functions for each new development and not have a significant adverse impact on other shoreline functions fostered by the policy of the Shoreline Management Act. Mitigation measures are listed in descending order of priority. Lower priority measures shall be applied only where higher priority measures are determined to be infeasible or inapplicable. Mitigation in excess of that necessary to ensure that development will result in no net loss of ecological functions will not be required, but may be voluntarily performed.

A. Avoid the impact altogether by not taking a certain action or parts of an action;

- B. Minimize impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology or by taking affirmative steps to avoid or reduce impacts;
- C. Rectify the impact by repairing, rehabilitating, or restoring the affected environment;
- D. Reduce or eliminate the impact over time by preservation and maintenance operations;
- E. Compensate for the impact by replacing, enhancing, or providing substitute resources or environments; and
- F. Monitor the impact and the compensation projects and taking appropriate corrective measures.

Finding: As described in the *Mitigation Sequencing and No Net Loss Narrative* prepared by Moffatt & Nichol on behalf of the Port of Ilwaco, mitigation sequencing was followed during the design of this project proposal. Avoidance by taking no action was demonstrated to be not feasible as it was documented in the Geotechnical Engineering Report that the bulkhead is at risk of failure. Additional alternatives were considered but were deemed not feasible or inadequate. The project proposal has been minimized to the extent practicable. Avoidance and minimization measures, including BMPs, will be implemented throughout construction. The applicant has prepared a compensatory mitigation plan that enhances the aquatic environment compared to current conditions. Additional monitoring efforts are not expected to be necessary for this project proposal as outlined in the findings of SMP Section 6.3(4), Compensatory mitigation.

SMP Section 6.3(4) Compensatory mitigation

When compensatory measures are appropriate pursuant to the mitigation sequence analysis described in regulation 6.3(3):

- A. Preferential consideration shall be given to measures that replace the impacted functions directly and in the immediate vicinity of the impact. However, alternative compensatory mitigation within the watershed that addresses limiting factors or identified critical needs for shoreline resource conservation based on watershed or comprehensive resource management plans applicable to the area of impact may be authorized.
- B. Compensatory mitigation measures must be maintained over the life of the use or development.
- C. Authorization of compensatory mitigation measures may require appropriate safeguards, terms, or conditions as necessary to ensure no net loss of ecological functions.

Finding: The proposed mitigation to offset the expected project impacts include piling removal, removal of creosote from the aquatic environment, beach nourishment, and removal of floating timber debris/overwater coverage from the marine environment. Approximately twenty-eight (28) creosotetreated timber piles (12-inch diameter) and three (3) steel piles (12-inch diameter) will be removed adjacent to the existing bulkhead and as part of the north shoreline rehabilitation. In addition, the Port proposes to remove approximately thirty-six (36) 12-inch diameter derelict creosote-treated timber piles and 3 creosote-treated timber pile caps as mitigation for the fill and benthic habitat impacts created by the placement of the new bulkhead wall in front of the existing structure. The removal of approximately sixty-four (64) 12-inch creosote-treated timber piles, three (3) 12-inch steel piles, 70 linear feet of creosote treated timber retaining wall, and 40 linear feet of derelict creosote-treated timber pile caps will restore approximately 165 square feet of benthic habitat and remove approximately 34 tons of creosote from the marine environment. Additionally, floating timber debris will be removed from the south portion of the marina as part of the project mitigation. This will remove approximately 2,510 square feet of overwater coverage currently present in that portion of the marina. The proposed compensatory mitigation was identified in consultation with federal and state agencies including additional coordination with WDFW to identify sufficient mitigation to address project impacts. No additional safeguard measures are expected to be needed provided that the mitigation plan is implemented as proposed. As a condition of approval, documentation must be provided that the mitigation measures have been implemented as proposed prior to the final inspection of the project.

SMP Section 7.9(2) Fill & excavation

When allowed, waterward of the ordinary high water mark. Fills waterward of the ordinary high water mark shall be allowed only when necessary to support:

A. A water-dependent or public access use.

Finding: The Safe Coast Seafoods facility is a permitted water-dependent use as a seafood processing facility in the High Intensity SED. The existing port facilities are protected by structural shoreline stabilization measures that have been documented as failing in the Geotechnical Engineering Report prepared by GeoEngineers. The proposed replacement shoreline stabilization along Waterfront Way will protect an existing public road and a temporary berth for the marina. Approximately 1,000 square feet of the fill would encounter the bottom substrate and result in permanent impacts to the existing aquatic soft bottom habitat. These impacts will be mitigated through compensatory mitigation to ensure no net loss of shoreline ecological function. Fill in the aquatic environment (below the ordinary high water mark) is considered a Shoreline Conditional Use pursuant to SMP Section 7.1 (Table 7-1 - Shoreline use, development, and modification matrix).

SMP Section 7.9(3) Protection of shoreline ecological functions

Fills and excavations shall be located, designed, and constructed to protect shoreline ecological functions and ecosystem-wide processes, including channel migration.

Finding: The project proposal has been designed to ensure that there is no net loss of shoreline ecological function. The proposed fill placement and excavation activities have been minimized to the extent practicable. The proposal includes removal of creosote and concrete from the aquatic environment, removal of derelict overwater structures, and will include beach nourishment in the form of fish mix on top of the replaced shoreline stabilization at the head of the berth.

SMP Section 7.9(4) Design.

All fills and excavations, except when for the purpose of shoreline restoration, must be designed:

- A. To be the minimum size necessary to implement the allowed use or modification.
- B. To fit the topography so that minimum alterations of natural conditions will be necessary.
- C. To not adversely affect hydrologic conditions or increase the risk of slope failure, if applicable.

Finding: The fill and excavation have been minimized to the extent practicable and are the minimum size necessary to protect the existing facilities and mitigate the future effects of sea level rise. The Geotechnical Engineering Report prepared by GeoEngineers includes an analysis that the proposed development actions will not increase the risk of slope failure anywhere along the project area.

SMP Section 7.9(5) Fill material

Unless site characteristics dictate otherwise, fill material within surface waters or wetlands shall be sand, gravel, rock, or other clean material with a minimum potential to degrade water quality and shall be obtained from a state-authorized source.

Finding: The backfill material behind the east bulkhead will be clean gravel. The material on top of the proposed slope protection along the south side of the berth will be fish mix as recommended by Washington Department of Fish and Wildlife (WDFW). As a condition of approval, all material shall be obtained from a state-authorized source to meet this requirement.

SMP Section 7.9(6) Temporary erosion and sediment control plan.

A temporary erosion and sediment control plan, including best management practices, shall be provided for all proposed fill and excavation activities. Disturbed areas shall be immediately protected from erosion using mulches, hydroseed, or similar methods, and revegetated, as applicable.

Finding: The contractor must adhere to the best management practices (BMPs) and the erosion control measures outlined in the JARPA and detailed plan set prepared by Moffat & Nichol. Fill in, over or near water will be required to be conducted within the appropriate in-water construction window and must follow all appropriate BMPs.

SMP Section 7.18 Shoreline stabilization
SMP Section 7.18(3) New or enlarged structural stabilization measures, when allowed.

New or enlarged structural stabilization measures shall not be allowed except as follows.

- C. In support of water-dependent development, when all of the conditions below apply.
 - I. The erosion is not being caused by upland conditions, such as the loss of vegetation and drainage.

Finding: The existing facility is protected by shoreline stabilization to the north, east and south of the project area. As described in the *Mitigation Sequencing and No Net Loss Narrative* prepared by Moffatt & Nichol, if left in its current state, the eastern bulkhead will eventually fail, which will result in a permanent loss of access to the facility (the access driveway adjacent to the bulkhead would be permanently blocked off), potential damage to buildings/building foundations, life/safety issues for Safe Coast Seafoods workers and marina tenants, inability for Safe Coast Seafoods to maintain operations resulting in loss of income and revenue for this small community, and obstruction of a portion of the marina (adjacent slip) making it unusable. The failing bulkhead is not caused by upland conditions.

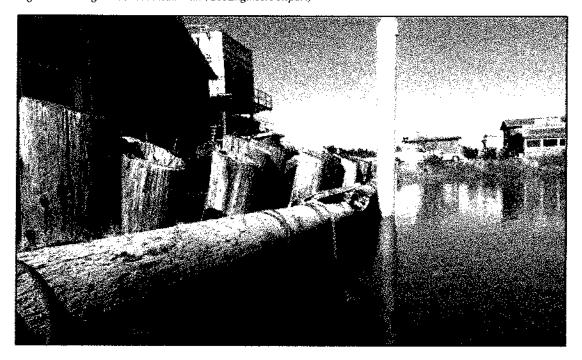
2. Nonstructural measures, planting vegetation, or installing on-site drainage improvements, are not feasible or not sufficient.

Finding: Non-structural measures are not feasible for the existing wharf. Drainage improvements have been incorporated into the design of the bulkhead and the paving/regrading portion of the project to improve resiliency of the Safe Coast Seafoods facility.

3. The need to protect primary structures from damage due to erosion is demonstrated through a geotechnical report prepared in accordance with regulation 7.18(6).

Finding: The Geotechnical Engineering Report prepared by GeoEngineers describes that the bulkhead is in serious structural condition and at risk of failing. Recent biweekly and monthly measurements have been completed to monitor ongoing movement of the bulkhead. The monitoring has recorded movement along 13 monitoring points along the face of the bulkhead ranging from approximately 0.06 inch to up to 0.31 inch waterward since monitoring began in November 2022. The monitoring indicates that the bulkhead is the process of active failure. Frequent flooding due to high water levels from "king tides" and severe winter storm surges further threaten the structural capacity of the bulkhead. The majority of the existing timber bulkhead will be abandoned in place behind the replacement bulkhead in order to protect the existing buildings at the Safe Coast Seafoods facility, as complete removal of the existing timber bulkhead will undermine the stability of the soil behind the bulkhead and the adjacent building foundations threatening Safe Coast buildings, infrastructure, and operations. Pavement settlement has been observed on the adjacent landward driveway and bulkhead movement measured during monthly monitoring (late 2022/early 2023) and access is now restricted based on those conditions and the condition of the deteriorating bulkhead.

Figure 3: Damaged East Bulkhead Wall (GeoEngineers Report)



4. The stabilization measure will not result in a net loss of shoreline ecological functions.

Finding: As described in the *Mitigation Sequencing and No Net Loss Narrative* prepared by Moffatt & Nichol on behalf of the Port of Ilwaco, mitigation sequencing was followed during the design of this project proposal and compensatory mitigation is anticipated to result in no net loss of shoreline ecological functions.

SMP Section 7.18 (7) Design of structural stabilization measures.

A. Soft approaches shall be used unless demonstrated not to be sufficient to protect primary structures, dwellings, and businesses. Hard armoring solutions shall not be authorized except when a geotechnical report prepared in accordance with regulation 7.18(6) confirms that there is a significant possibility that a primary structure will be damaged within three years as a result of shoreline erosion in the absence of such hard armoring measures, or where waiting until the need is that immediate, would foreclose the opportunity to use measures that avoid impacts on ecological functions. Thus, where the geotechnical report confirms a need to prevent potential damage to a primary structure, but the need is not as immediate as the three years, that report may still be used to justify more immediate authorization to protect against erosion using soft measures.

Finding: The Geotechnical Engineering Report prepared by GeoEngineers describes that the bulkhead is in serious structural condition and at risk of failing. Recent biweekly and monthly measurements have been completed to monitor ongoing movement of the bulkhead. The monitoring has recorded movement along 13 monitoring points along the face of the bulkhead ranging from approximately 0.06 inch to up to 0.31 inch waterward since monitoring began in November 2022. The monitoring indicates that the bulkhead is the process of active failure. Frequent flooding due to high water levels from "king tides" and severe winter storm surges further threaten the structural capacity of the bulkhead. Softer alternatives are not feasible to protect the existing wharf and facilities.

B. The size of stabilization measures shall be limited to the minimum necessary.

Finding: The size of the stabilization measures has been determined to be the minimum necessary as demonstrated by the *Mitigation Sequencing and No Net Loss Narrative* prepared by Moffatt & Nichol. Alternatives were evaluated and determined to be insufficient or not feasible. The replaced shoreline stabilization measures will remove concrete debris and creosote from the aquatic environment compared to current conditions. Improvements to the existing northern timber bulkhead are proposed that will include a fish mix layer to act as beach nourishment on top of the hard shoreline stabilization for a "softer" approach than current conditions.

C. Measures shall be used to assure no net loss of shoreline ecological functions.

Finding: As described in the *Mitigation Sequencing and No Net Loss Narrative* prepared by Moffatt & Nichol, on behalf of the Port of Ilwaco, mitigation sequencing was followed during the design of this project proposal and compensatory mitigation is anticipated to result in no net loss of shoreline ecological functions.

D. Soft shoreline stabilization measures that provide restoration of shoreline ecological functions may be permitted waterward of the ordinary high water mark.

Finding: No applicable. Soft shoreline stabilization measures are not proposed as a part of this proposal. Improvements to the existing northern timber bulkhead are proposed that will include a fish mix layer to act as beach nourishment on top of the hard shoreline stabilization for a "softer" approach than current conditions.

E. Avoid and, if that is not possible, minimize adverse impacts to sediment conveyance systems. Where sediment conveyance systems cross jurisdictional boundaries, the local governments should coordinate shoreline management efforts.

Finding: Minor, localized, and temporary effects from increased suspended sediment due to construction activities are likely, however, BMPs will be implemented to reduce turbidity and/or any incidental impacts to water quality as the result of leaks or spills. The piles will be removed in a single, slow, and continuous motion in order to minimize sediment disturbance and turbidity in the water column.

F. Publicly financed or subsidized shoreline erosion control measures must not restrict appropriate public access to the shoreline except where such access is determined to be infeasible in accordance with regulation 6.5(5). Where feasible, ecological restoration and public access improvements shall be incorporated into projects.

Finding: The project will not interfere or change public access to the site or existing permitted uses. The proposal will restore the bulkhead's function as a temporary berth for Safe Coast Seafoods and for marina access that cannot currently be used to the deteriorating condition. A portion of the project includes paving and regrading of the currently restricted internal access road due to the condition of the deteriorating bulkhead. The proposed mitigation includes piling removal, removal of creosote from the aquatic environment, beach nourishment, and removal of floating timber debris/overwater coverage from the marine environment.

SMP Section 8.10.2 Review criteria for shoreline substantial development permits

SMP Section 8.10.2(1) Authorization criteria.

A shoreline substantial development permit shall be granted only when the development proposed is consistent with:

- A. The policies and procedures of the Shoreline Management Act;
- B. The provisions of this regulation; and
- C. The City's Shoreline Master Program.

Finding: The proposed development includes replacement of existing shoreline stabilization structures that protect the water-dependent uses associated with the Safe Coast Seafoods facility and the Port of Ilwaco marina. The new bulkhead is intended to replace the existing, failing bulkhead and improve resiliency to sea level rise. The project will not otherwise interfere with or change public access to the site or existing permitted uses. Demonstration of compliance with the applicable regulations in the SMP are outlined above..

SMP Section 8.10.3 Review criteria for shoreline conditional use permits

SMP Section 8.10.3(2) Authorization criteria.

Uses which are classified or set forth in the City's Shoreline Master Program as shoreline conditional uses may be authorized provided that the applicant demonstrates all of the following:

A. That the proposed use is consistent with the policies of RCW 90.58.020 and the City's Shoreline Master Program;

Finding: No changes to the existing permitted use of the site as a seafood processing facility are proposed with this application. The development will be limited to replacement of existing shoreline stabilization structures and regrading/paving of the existing access road. Given that the existing bulkhead cannot be removed as outlined in the *Mitigation Sequencing and No Net Loss Narrative* prepared by Moffatt & Nichol, the replacement sheetpile bulkhead will be constructed waterward of the existing timber shoreline stabilization structure.

B. That the proposed use will not interfere with the normal public use of public shorelines;

Finding: The project will not interfere or change public access to the site or existing permitted uses. The proposal will restore the bulkhead's function as a temporary berth for Safe Coast Seafoods and for marina access that cannot currently be used.

C. That the proposed use of the site and design of the project is compatible with other authorized uses within the area and with uses planned for the area under the comprehensive plan and the City's Shoreline Master Program;

Finding: The proposed use and design are compatible with the other authorized uses of the Port of Ilwaco marina and any planned uses. The use of the property will be retained as Safe Coast Seafoods, and the bulkhead replacement and related proposed shoreline stabilization measures are compatible with the existing structures.

D. That the proposed use will cause no significant adverse effects to the shoreline environment in which it is to be located; and

Finding: The project proposal has been designed to include an increase in habitat value and a functional lift by removing croosote and concrete from the aquatic environment. Additional benefit has been added by placing a fish mix over the proposed shoreline stabilization at the head of the slip that will act as beach nourishment.

E. That the public interest suffers no substantial detrimental effect.

Finding: The project proposal has been designed to incorporate sea level rise projections to mitigate the impacts of a changing climate. Failure of the existing bulkhead would cause negative economic impacts for the community and overall Port of Ilwaco marina operations. Increased climate resiliency for the Safe Coast Seafoods facility and Port of Ilwaco marina is expected to preserve the public interest.

SMP Section 8.10.3(3) Consideration of cumulative impacts.

In the granting of all shoreline conditional use permits, consideration shall be given to the cumulative impact of additional requests for like actions in the area. For example, if conditional use permits were granted for other developments in the area where similar circumstances exist, the total of the conditional uses shall also remain consistent with the policies of RCW 90.58.020 and shall not produce substantial adverse effects to the shoreline environment.

Finding: Additional requests for like actions in the area are unlikely. The proposal is for the replacement and/or improvement of existing shoreline stabilization structures at a wharf with seafood processing facilities. There is very limited potential for other developments in the area where similar circumstances exist.

V. STAFF RECOMMENDATION AND CONDITIONS OF APPROVAL

The City recommends APPROVAL of the site plan review with the following conditions.

- 1. The permit shall not begin and is not authorized until twenty-one (21) days from the date of filing as defined in RCW 90.58.140(6) and WAC 173-27-130, as amended, or until all review proceedings initiated within twenty-one (21) days from the date of such filings have been terminated, except as provided in RCW 90.58.140(5)(c) and (d).
- 2. All development must adhere to the recommendations included in the *Geotechnical Engineering Services Report* prepared by GeoEngineers dated October 4, 2023.
- 3. All local, state, and federal regulations are adhered to. Additional permits or authorizations from other agencies will be required, including, but not limited to, Washington Department of Fish and Wildlife, United States Army Corps of Engineers, Washington State Department of Ecology, and Washington State Department of Natural Resources Aquatic Resources Division.
- 4. Gravel, drainrock, and fish mix fill material shall be obtained from a state-authorized source in compliance with SMP Section 7.9(5).
- 5. Documentation must be provided that the mitigation measures have been implemented as proposed prior to the final inspection of the project.

VI. HEARINGS EXAMINER CONDITIONS OF APPROVAL

Conditions of Approval

The Hearings Examiner will issue their conditions of approval at the hearing.

VII. APPEALS PROCESS

Appeals

Pursuant to SMP Section 8.14, all appeals of any final permit decisions under RCW 90.58 and WAC 173-27 are governed by the procedures established in RCW 90.58.180 and WAC 461-08.Questions regarding this decision and staff report can be addressed to Holly Beller, via email at treasurer@ilwaco-wa.gov, or by phone at (360) 678-7817.

Holly Beller

City Administrator

Call Blu

Alexandra Plumb Consultant Planner

Alyada Jub



FOR CITY USE ONLY	
Date Received	
Fee Paid	
Type of Fee	
Receipt #	
Received By	

MASTER PLANNING PERMIT APPLICATION FORM

Application form must be accompanied by the Master Planning Application Checklist and all application fees.

GENERALINFORM	IATION		
Type of Application	Shoreline Substantial Development	Permit	
Name of Project	Port of Ilwaco East Bulkhead Resil	lence Project	
APPLICANT			
Name/Company	Port of Ilwaco		
Address	PO Box 307	City/State/Zip	liwaco, WA 98624
Telephone	360-642-3143	Cell Phone	
Fax	360-642-3148	Email tiofs	strom@portofilwaco.org
If owner is differe make applications	nt from applicant, what is the legal relationships?	of the applicant t	o the owner that entitles the applicant to
Applicant's (Signature	Theory	Date	4/30/23
REPRESENTATIVE	(if different from Applicant)		
Name/Company	Victoria England, Moffatt &	Nichol	
Address	600 University St, Suite 610	City/State/Zip	Seattle, WA 98101
Telephone	206-622-0222	Cell Phone	
Fax		Email	vengland@moffattnichol.com
CONTACT PERSO	N/ENTITY (designate a single person/entity to	receive determina	ations and notices from the city.
Name	Tracy Lofstrom, Port of Ilwaco		
Address	PO Box 307	City/State/Zip	Ilwaco, WA, 98624
Telephone	360-642-3143	Cell Phone	
Fax	360-642-3148	Email thofstro	m@portofilwaco.org

	WA BUS 4	
Name —-	WA DNR Aquatic Rivers Lands Lease	[& Port of flwaco (applicant)]
Address	601 Bond Road; PO Box 280, C	
City/State/Zip	Castle Rock, WA 98611	
Telephone	360-577-2025	Fax
Email	aquaticleasing.rivers@dnr.wa.gov	
We, the undersign	ned, grant the applicant permission to use our proper	ty in the manner described in this application.
Owner's Signature		Date
Owner's		Date

PROPERTY INFORMAT	TION
Property Address/Location	117 Howerton Avenue Southeast, Ilwaco, WA
Assessor Parcel Nos.	73048003011, 73048003009, 73031013000
Current Zoning	High Intensity Shoreline
Current Land Use	Safe Coast Seafood processing facility and Port of Ilwaco Marina slip
Proposed Land Use	Safe Coast Seafood processing facility and Port of Ilwaco Marina slip

LEGAL/FINANCIAL RESPONSIBILITY/AUTHORITY TO ENTER PROPERTY

I/we acknowledge that by signing this application I/we are authorizing employees or agents of the City of Ilwaco to enter onto the property which is the subject of this application during the hours of 7:00 a.m. to 6:00 p.m., Monday through Friday, for the sole purpose of making any inspection of the limited area of the property which is necessary to process this application, including follow-up inspections after permit issuance. In the event the City determines that such an inspection is necessary during a different time or day, the applicant(s) further agrees that the City employees or agents may enter the property during such other times and days as necessary for such inspection upon 24 hours' notice to the applicant(s), which notice will be deemed received when given either verbally or in writing.

We, the undersigned, attest under penalty of perjury that the information in this application is true and accurate. We also acknowledge that it is our responsibility to understand and comply with all applicable federal, state and local regulations. Further, we agree that we shall be financially responsible for any and all engineering and planning services or other professional consulting/legal services deemed necessary by the city for the complete permit and plan review. These additional fees, if any, shall be paid in full prior to final signing of any permits, final plats, Mylar's, etc. (IMC 15-08-065).

Signature	Tracy	Date	4/30/23
Signature		Date	

ATTACHMENT A: MASTER PLANNING APPLICATION CHECKLIST

CITY OF ILWACO	120 First Avenue North PO Box 548 Ilwaco, WA 98624 Phone: 360.624.3145 Fax: 360.642.3155 www.ilwaco-wa.gov	OFFICE USE ONLY
PROJECT / PROPERTY INFO	DRMATION	
Tax Parcel ID #: 73048003011, 730	48003009, 73031013000	
Project / Value: \$3.5 Million		
OWNER / APPLICANT INFO	RMATION	
Owner: Port of Ilwaco		
Applicant: Port of Ilwaco, Manager - T	racy Lofstrom	
Contractor:		
PROJECT INFORMATION - F	allure to provide complete information	n will lead to a rejection of your permit
1. List of existing improvement	ts, structures, and dimensions: Bi	ulkhead ~160 LF, revetment 70 LF, drive 8,000 SF
2. Site Plan (See Site Plan Re	quirement Checklist) Attached? Y	YES X NO D Additional design details are included in the general design set, expected submittal to the City Mid
3. Is the proposed development the entire project in detail: No	nt one phase of a larger project o	r larger development?: If yes, describe
		roposed site, or within the immediate
		streams, saltwater, lakes, ponds,
wetlands?: YES ☒ NO □	liwaco Marina in Baker Bay along the north s	hore of the Columbia River
	existing driveway?: YES 🕱 NO □	
	ear or withiπ a drainage way (ditc	
YES NO approximately 450 cu	ibic yards of free draining drainage rock backfil head	will be placed between the existing timber bulkhead and
	stable soils or slopes?: YES ⋈ N	ОП
	le or natural drainage features?: '	
	esult of this project?: YES □ NO	· · · · · · · · · · · · · · · · · · ·
	king in a public right-of-way?: YE	· · · · · · · · · · · · · · · · · · ·
answer the following. If No, go	to number 13. Yes	, surface and/or dredging?: If Yes,
A. If activities include clearing a	and grading greater than 1,000 so	q. ft. Indicate SF: 8,000 SF
 B. Will activities involve placing 	of fill materials? YES 💢 NO □	
C. If fill materials exceed 20 cu	bic yards. Indicate Cubic Yards:	747 cy (718 cy bellow HTL, 29 cy above HTL)
	noval exceeding 2 feet in depth (E	Excluding foundation excavations).
microate maximum Depth F1.	-1 W -1	
· · · · · · · · · · · · · · · · · · ·	equire connection to City Water o	
 Has the proposed site beer flagged/staked. 	n flagged/staked? YES □ NO X If	No, contact the City when
14. Indicate amount of new impetc) SF: approximately 1,250 SF of paving	pervious area (areas covered by the finew impervious surfaces including the fireward includ	puildings, pavement, concrete, gravel, ne new bulkhead cap and additional



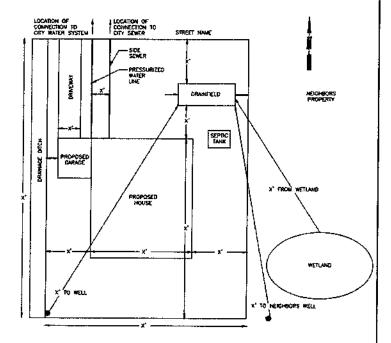
120 First Avenue North
PO Box 548 • Ilwaco, WA 98624
Phone: 360.642.3145
Fax: 360.642.3155
info@ilwaco-wa.gov
www.ilwaco-wa.gov

Example Site Plan

Follow Checklist when drawing site plan
Drawn to Scale 1" = 20ft

"X" = Distance

Note: Any changes to your site plan will require re-submittal and a re-submittal fee may be charged.



SITE PLAN REQUIREMENT CHECKLIST

All site plans shall be clearly and accurately drawn to scale on paper no larger than 11" x 17" and must indicate all of the information listed below. For ease of drawing the site plan, use the graph paper provided with your application packet. For each item, mark either "shown" or "N/A" as apporpriate for your project.

This checklist must be completed and included with all site plans. Any site plan without this checklist may be rejected and returned to the applicant for correction.

Parcel No.: 73048003011, 73048003009, 73031013000

A. General Property Information

Shown	N/A	
X	\bigcirc	Property Lines, including dimensions.
※ >	\bigcirc	North arrow & site plan scale.
X	\circ	Marine waters, lakes and ponds, streams, creeks & wetlands.
∑	\bigcirc	Locations & dimensions of all existing
\bigcirc	×	structures on the property. Location of any existing wells & their 100' well radius.

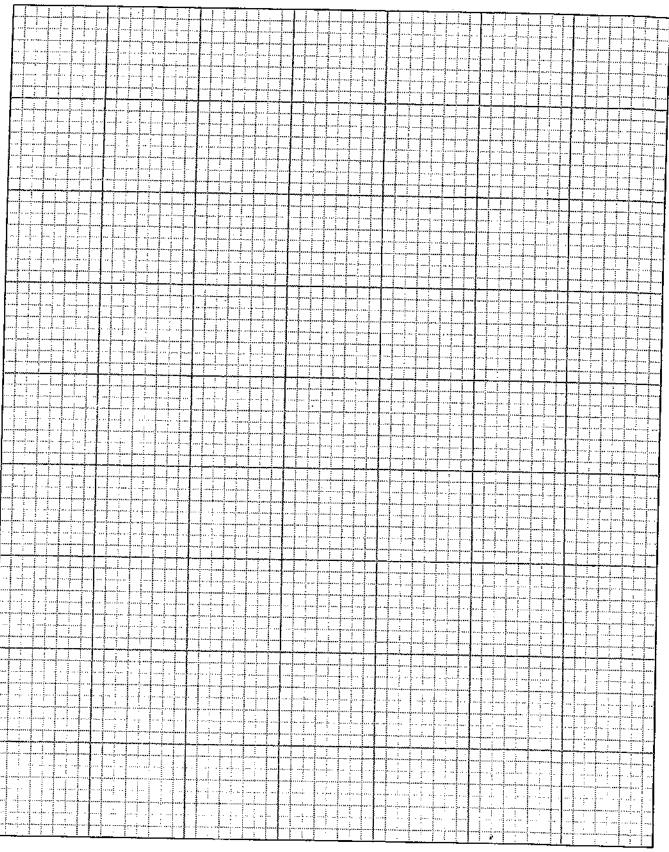
B. Existing Property Improvements

(_)	X	Location of side sewer.
\bigcirc	×	Location of water meter & service lines.
\bigcirc	X	Location of all existing drain fields on
		the site.
<u></u>	X	Location of existing drainage systems.
X	\bigcirc	Location of all existing roads,
		driveways, utilities, easements, bridges.
\mathbf{X}	\bigcirc	Location & dimensions of all proposed
		structures in relation to property lines,
		other structures, wetlands, etc.

C. Proposed Property Improvements

	X	Minimum zoning setbacks shown.
\sim	×	Location of proposed water meter &
		service lines, and connection to city water
	_	main.
\bigcirc	X	Location of proposed side sewer and
		connection to city sewer,
\circ	X >	Location & dimensions of all proposed
		drainage systems.
\mathbf{x}	\bigcirc	Location & dimensions of all roads,
		driveways, parking areas, utilities.
X	\bigcirc	Location/extent of all clearing, grading,
		& filling

C ty of Ilwaco





120 First Avenue North

PO Box 548 • Ilwaco, WA 98624

Phone: 360.642.3145 Fax: 360.642.3155 www.ilwaco-wa.gov

Shoreline Master Program Conditional Use Permit Application

PROJECT/PROPERTY INFORMATION Tax Parcel ID #: 73048003011, 73048003009, 73031013000 Site Address: 117 Howerton Avenue Southeast, Ilwaco, WA

OWNER/APPLICANT INFORMATION:

Owner: Port of Ilwaco (& DNR Aquatic Lands Lease)

Applicant: Port of Ilwaco

OFFICEUSEONLY

The purpose of a conditional use permit is to provide a system within the shoreline master program that allows flexibility in the application of use regulations in a manner consistent with the policies of RCW 90.58. In authorizing a condition- all use, special conditions may be attached to the permit by the City of Ilwaco to prevent undesirable effects of the proposed use and/or to ensure consistency of the project with the Shoreline Management Act and the City of Ilwaco Shoreline Master Program.

DIRECTIONS: This Shoreline Master Program Conditional Use Permit Application shall accompany a completed Master Planning Permit Application, a SEPA Checklist, a JARPA and an accurate to scale Site Plan. Provide all of the requested information and answer the questions as thoroughly as possible. Attach supporting information, as necessary, to support the application. Contact the City Planner with any questions.

Project Description:

The proposed Port of Ilwaco East Bulkhead Resilience Project (herein referred to as the 'Project') would consist of three primary elements;

- 1. Replacing the failing east bulkhead with an anchored steel sheetpile bulkhead
- 2.Repairing slope protection north and south of the bulkhead
- 3.Paving and regrading the upland wharf area (access driveway) directly landward of the bulkhead to mitigate the effects of sea level rise.

Additional detail is provided in the attached project SEPA Checklist

Describe the requested conditional use:

The project will include drain rock backfill that must be placed between the existing bulkhead that will mostly remain in place and the, new replacement bulkhead. The new bulkhead must be placed waterward of the existing bulkhead due to the precarious, deteriorated condition of the existing bulkhead. The existing bulkhead cannot be removed without risking the failure of the slope beneath the wharf and Safe Coast Seafood facilities, potential damaging the building and infrastructure and endangering worker and public safety. The drain rock must be placed in the space between the new and existing bulkheads to prevent the buildup of water pressure behind the new bulkhead which could undermine the new bulkhead is stability. The new bulkhead will be located as close as practicable to the existing bulkhead while still maintaining its function as a temporary berth for vessels un/loading at the Safe Coast Seafood facility. The deteriorated nature of the existing bulkhead, leaning as much as 10 degrees waterward, also dictates the location of the new bulkhead

1 -		
Program	ibe how the proposed use is consistent with the policies of RCW 90.58 and the City of Ilwaco Shor roposed use is the replacement of an artist.	rolina * *
The pro	roposed use is the replacement of an existing structure that maintains the use of both the Safe Could the Ilwaco Marina, both of which are water dependent and critical to the Ilwaco general Authors and will replace the existing faith are water dependent and critical to the Ilwaco general Authors and critical to the Ilwaco general Authors and Countries to the Ilwaco general Authors and Ilwaco general Authors and Ilwaco general Authors and Ilwaco general Autho	reline Mas
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new bul	ulkhead will replace the existing, failing bulkhead, providing a more stable shoreline and preliminar vel rise resilience for the facility. The project will not interfere or change public access to the other stable shoreline and preliminar and preliminar the liwaco economy. Adverse resilience for the facility. The project will not interfere or change public access to the other stables.	asi Seatod
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The City of Ilwaco is an equal opportunity provider and employer.

120 First Avenue North PO Box 548 • Ilwaco, WA 98624 Phone: 360.642.3145

Fax: 360.642,3155 www.ilwaco-wa.gov

May 2, 2023

Port of Ilwaco PO Box 307 Ilwaco, WA 98624

Subject: Port of Ilwaco East Bulkhead Resilience Project

Thank you for discussing this project at the pre-application meeting on April 12, 2023. As a follow up to the pre-application meeting, this letter provides comments from the City project review team in anticipation of formal application submittal, as well as initial comments from the Washington Department of Fish and Wildlife (WDFW).

The comments in this letter are the result of a preliminary review of materials provided by the applicant/contact. Additional review may disclose additional substantive or procedural requirements.

This letter contains several references to the City's Shoreline Master Program (SMP). The City's SMP can be found here:

https://www.ilwaco-wa.gov/wp-content/uploads/2017/09/Locally-adopted-SMP.pdf

Project Review Process

- The project is not exempt under the State Environmental Policy Act (SEPA) and will require SEPA review.
- 2. The project is not eligible for a shoreline exemption under WAC 173-27-040(2).
- 3. The project will require a shoreline substantial development permit for activities including, but not necessarily limited to, shoreline stabilization (SMP Table 7-1).
- 4. The project will require a shoreline conditional use permit for fill below the ordinary high water mark in the Aquatic shoreline environment designation (SMP Table 7-1). The City's Hearing Examiner has the authority to grant or deny shoreline conditional use permits (SMP 8.1(3)A). The Washington State Department of Ecology must also approve the shoreline conditional use permit pursuant to WAC 173-27-200.
- 5. The project will require engineering review by the City.

Project Submittal Requirements

The following submittals are required for formal application review. Please ensure all submittals are consistent with one another. All submittals must be complete and signed and sealed as applicable.

- Master Planning Permit Form and Checklist. This is available online here: https://cdn.townweb.com/ilwaco-wa.gov/wp-content/uploads/2022/03/Master-Planning-Permit-Application-Packet.pdf
- 2. SMP Conditional Use Permit Application. This is available online here: https://cdn.townweb.com/ilwaco-wa.gov/wp-content/uploads/2022/06/Shoreline-Master-Program-SMP-Conditional-Use.pdf
- 3. SEPA Checklist. This is available online here: https://cdn.townweb.com/ilwaco-wa.gov/wp-content/uploads/2022/06/SEPA-Checklist-with-added-help-links-and-instructions.pdf
- 4. Joint Aquatic Resource Permit Application (JARPA). Include in the JARPA a brief description of the predicted sea level rise scenario that the project is designed to accommodate and supporting methodology.
- 5. Geotechnical report. Demonstrate compliance with SMP 7.9(4), 7.18(3), (6) and (7). In demonstrating compliance with SMP 7.18(7), provide separate consideration of the area proposed for the sheetpile bulkhead, the adjacent shoreline area to the north, and the adjacent area to the south.
- 6. A narrative detailing how the proposed project will achieve no net loss of ecological functions prepared by a qualified professional. The narrative must consider aquatic habitat and vegetation. The City project review team, as well as other regulatory agencies with jurisdiction, have concerns about the adequacy of the mitigation currently proposed. Offsetting the aquatic area lost as a result of the proposed development with an equal or greater area of aquatic area gained would be expected to provide substantial support to a demonstration of no net loss of ecological functions. The letter from WDFW (Attachment A) provides several specific suggestions for mitigation measures that might be considered for demonstrating compliance with the requirement for no net loss of ecological functions in SMP 6.3(1).
- 7. A mitigation sequencing analysis, which is required when an action requires a conditional use permit (SMP 6.3(2)). See SMP 6.3(3) for specific instructions. This analysis may be included as a section in the no net loss narrative, above.
- 8. Biological Evaluation (referenced in JARPA).
- 9. Site plans, including the information in SMP 8.5(1)I, as applicable. Show proposed temporary erosion and sediment control (TESC) measures in the site plans.

- 10. Cultural resource survey (referenced in JARPA).
- 11. Fees payable to the City of Ilwaco in the amount of \$2,250.00. The fee breakdown is as follows:
 - Shoreline Substantial Development Permit (Commercial): \$1,000.00;
 - · Shoreline Conditional Use Permit: \$750.00; and
 - Hearing Examiner: \$500.00.

Further, the applicant shall be financially responsible for any engineering and planning services or other professional consulting/legal services deemed necessary by the City for the complete permit and plan review. These additional fees, if applicable, shall be paid in full prior to final signing of any permits.

Please contact the City with any questions.

dolephien

Sincerely,

Holly Beller

City Administrator

Mark Daniel, AICP Consultant Planner

mand for Barriel

Enclosures:

1. Attachment A, email from L. Bauernschmidt, WDFW, dated May 1, 2023

CC: Victoria England, Moffat & Nichol

From: Bauernschmidt, Lauren N (DFW) < Lauren.Bauernschmidt@dfw.wa.gov>

Sent: Monday, May 1, 2023 2:25 PM

To: Alexandra Plumb <a plumb@dcgwatershed.com>

Cc: Mark Daniel <mdaniel@dcgwatershed.com>; Holly Beller <treasurer@iiwaco-wa.gov>

Subject: RE: Port of Ilwaco Bulkhead Replacement

Hi Alexandra,

A short recap of the discussion we had on Thursday about the adequacy of the proposed mitigation for the Ilwaco Bulkhead Replacement.

The current proposal is not meeting WAC 220-660-080's requirement for no-net loss. The new permanent fill of 2,850 sq ft on the benthic habitat is not being offset by 165 sq ft of benthic habitat restored through piling and creosote removal. The mitigation is inadequate. I suggest the Port of Ilwaco reviews the requirements of compensatory mitigation as outlined in WAC 220-660-080. As the project currently stands, WDFW would not permit the work due to the project having unmitigated impacts.

I think there are additional ways to mitigate for the project, though these are only suggestions and will not necessarily meet the full need:

- Remove the scattered cement and marine debris bulkhead and restore the site.
- Remove any derelict piers or floats from the port.
- Incorporate grating into the project to prevent further shading of the benthic substrate.
- Wrap or remove the "abandoned in place" creosote pilings to prevent further leaching from occurring.
- Look for restoration areas in the flats outside of the marina.

Our preference for mitigation is in-kind, on-site but will consider mitigation that is out-of-kind and/or off-site if the Port can show limitations to meeting in-kind, on-site.

Please let me know if you have any questions, and I'm happy to discuss different options.

Thank you,



Lauren Bauernschmidt (she/her) Pacific County Habitat Biologist

Washington Dept of Fish & Wildlife Office: 360-249-1217 Mobile: 360-480-2558

Email: <u>Lauren.Bauernschmidt@dfw.wa.gov</u>

48 Devonshire Rd Montesano, WA 98563



From:

Bauernschmidt, Lauren N (DFW)

To:

England, Victoria

Subject: Date:

RE: Port of Ilwaco Mitigation Follow-Up Wednesday, June 14, 2023 5:02:06 PM

Attachments:

image001.ipg

Hi Victoria,

Yes, after further discussion we chose to consider the fish mix as part of the mitigation due to the proximity of the placement to the construction footprint. The placement is an on-site habitat benefit and therefore boosts the value of the action. I was also informed by some local restoration proponents that sand lance have been present in the area in the past, so there is a chance this placement could be utilized.

Thank you, Lauren

From: England, Victoria < vengland@moffattnichol.com>

Sent: Wednesday, June 14, 2023 4:54 PM

To: Bauernschmidt, Lauren N (DFW) < Lauren. Bauernschmidt@dfw.wa.gov>

Subject: RE: Port of Ilwaco Mitigation Follow-Up

External Email

Hi Lauren.

One follow up question – during our recent call you had stated that fish mix would not be considered part of the mitigation based on WDFW's assessment that sand lance and smelt would not be likely to pass through the marina but you mention the fish mix in your email below. Will WDFW consider the fish mix layer as part of the mitigation after all? The Port just wants to make sure that they aren't including anything that won't be considered part of the mitigation if it doesn't serve any other project purpose.

Please let me know.

Thank you!

Victoria

From: Bauernschmidt, Lauren N (DFW) < Lauren Bauernschmidt@dfw.wa.gov>

Sent: Wednesday, June 14, 2023 4:41 PM

To: England, Victoria < vengland@moffattnichol.com >

Subject: Port of Ilwaco Mitigation Follow-Up

CAUTION: This email originated from outside of the organization.

Good afternoon,

I was able to discuss the proposed mitigation, that you presented of behalf of the Port, with my team yesterday. To recap: the Port is proposing removal of the derelict pier/floats in the south area of the port (estimated to be 2,500 sq ft), creosote pile/timber and steel pile removal (165 sq ft), and fish mix placed on top of the rip-rap replacement (south shoreline). As per the draft JARPA, permanent impacts to waterbodies are 3,250 sq ft with 2,900 sq ft directly impacting benthic habitat.

I believe the proposed mitigation as listed above will collectively offset the permanent benthic habitat impacts from construction of the Ilwaco Port improvements. We still encourage the removal of the cement debris wall, but it is not required. When submitting the HPA application, please outline this mitigation plan in the application form. If you have any questions, please let me know.

Thank you,

12



TIDAL DATUM:

BASED ON NOAA TIDAL STATION NO. 9440581, IN US FEET. HTL/OHW DELINEATED BY GEOENGINEERS DECEMBER, 2022,

LEVELS:

MHHW: +8.07' MLW: 1.35'

MHW: +7.37* MLLW; +0.00'

OHW (DELINEATED):

APPROX. +11.50'

PROJECT LOCATION-

DIRECTIONS TO SITE FROM SEATTLE:

- I-5 S, US-101, WA-8 AND US-12 TO WA-107 S/S MAIN ST IN MONTESANO
- TAKE US-101 TO ILWACO
- ARRIVE AT PROJECT SITE

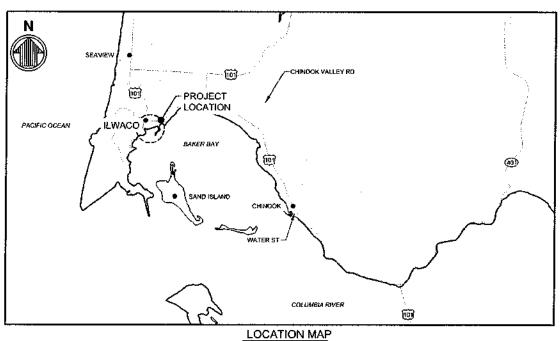
98 MILES

72 MILES

VICINITY MAP

WA

PROJECT ADDRESS: PORT OF ILWACO 117 HOWERTON AVE SE ILWACO, WA 98624



SCALE: NTS

APPLICANT:

PORT OF ILWACO

ADJACENT PROPERTY OWNERS:

1) PORT OF ILWACO

LOCATION:

PORT OF ILWACO

117 HOWERTON AVE SE

ILWACO, WA 98624 46.30442 N, -124.03852 W

LAT/LONG:

MLLW

SHEET: 1 OF 9 DATE: JUNE 2023 PROPOSED PROJECT: PORT OF ILWACO

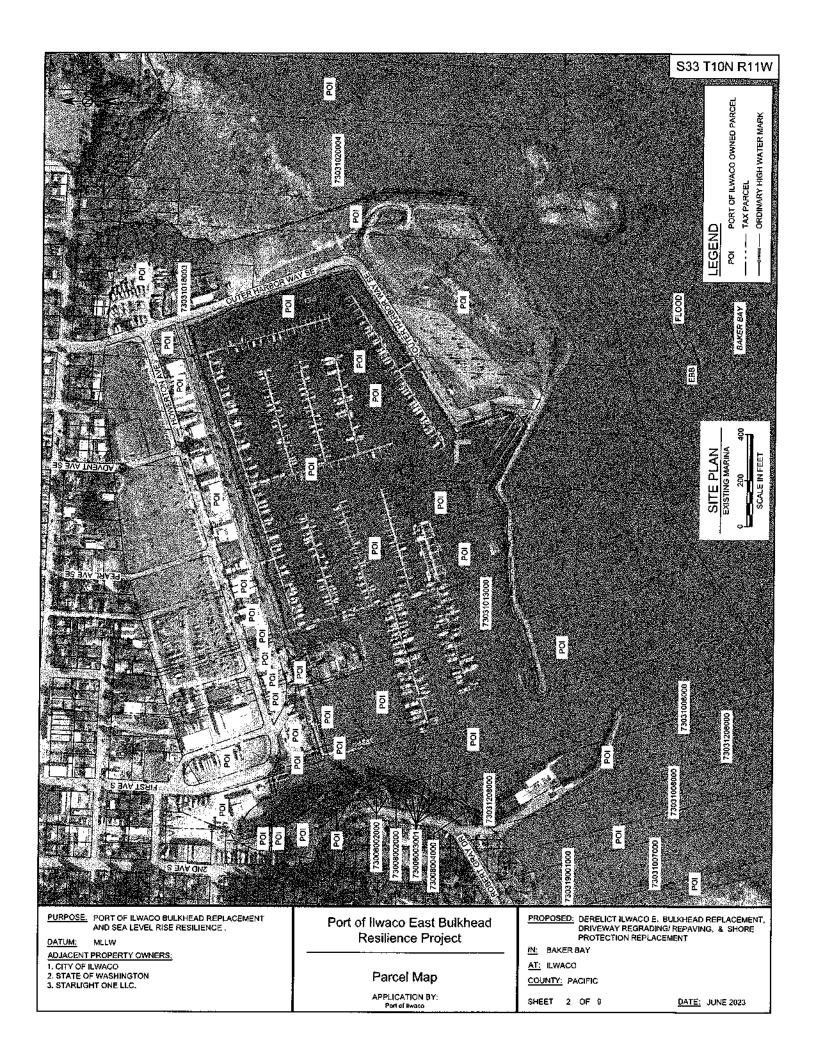
EAST BULKHEAD RESILIENCE PROJECT

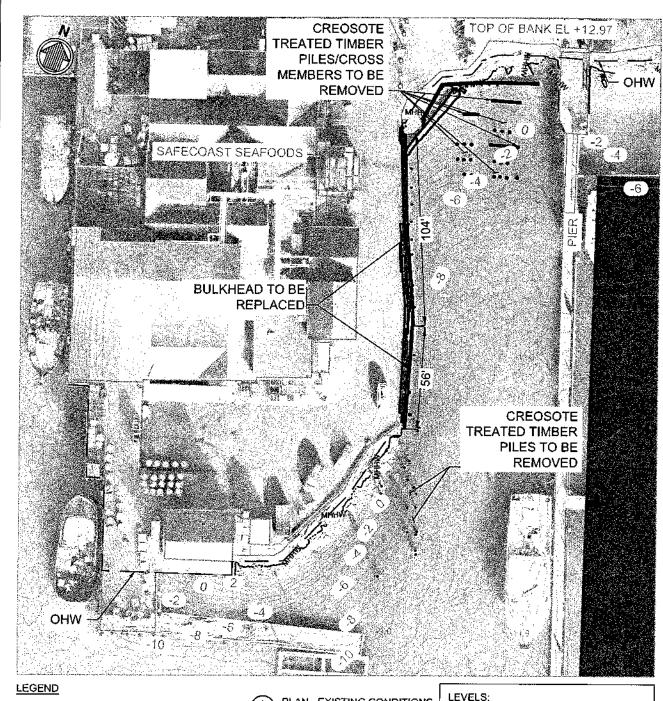
IN: BAKER BAY

NEAR/AT: ILWACO COUNTY: PACIFIC

STATE: WA

SEC: 33/34 <u>T:</u> 10 N <u>R:</u> 11 W





PILES

PLAN - EXISTING CONDITIONS

CREOSOTE-TREATED REVETMENT (TO BE REMOVED) CREOSOTE-TREATED LOG (TO BE REMOVED) BULKHEAD (TO BE REMOVED)

LEVELS:

MHHW: +8,07' MLW: 1,35° OHW (DELINEATED):

MHW: +7,37" MLLW: +0,00' APPROX. +11.50'

SCALE: 1"=50"

APPLICANT:

PORT OF ILWACO

ADJACENT PROPERTY OWNERS:

PORT OF ILWACO

LOCATION:

PORT OF ILWACO

117 HOWERTON AVE SE

ILWACO, WA 98624

LAT/LONG: 46.30442 N, -124.03852 W

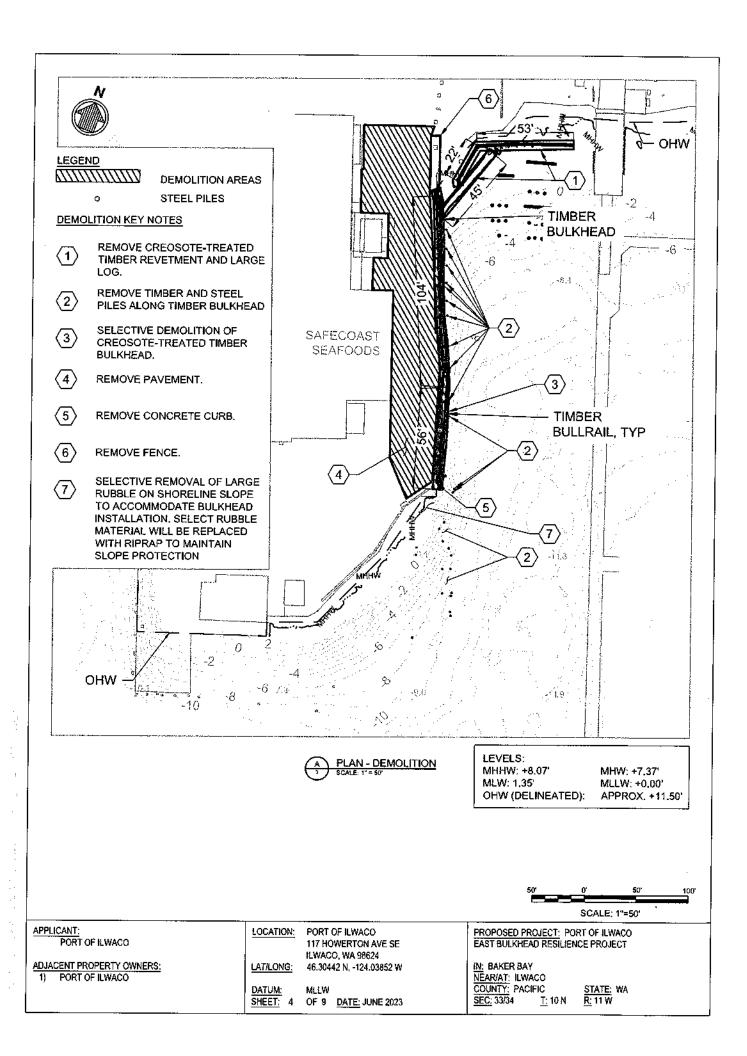
MLLW

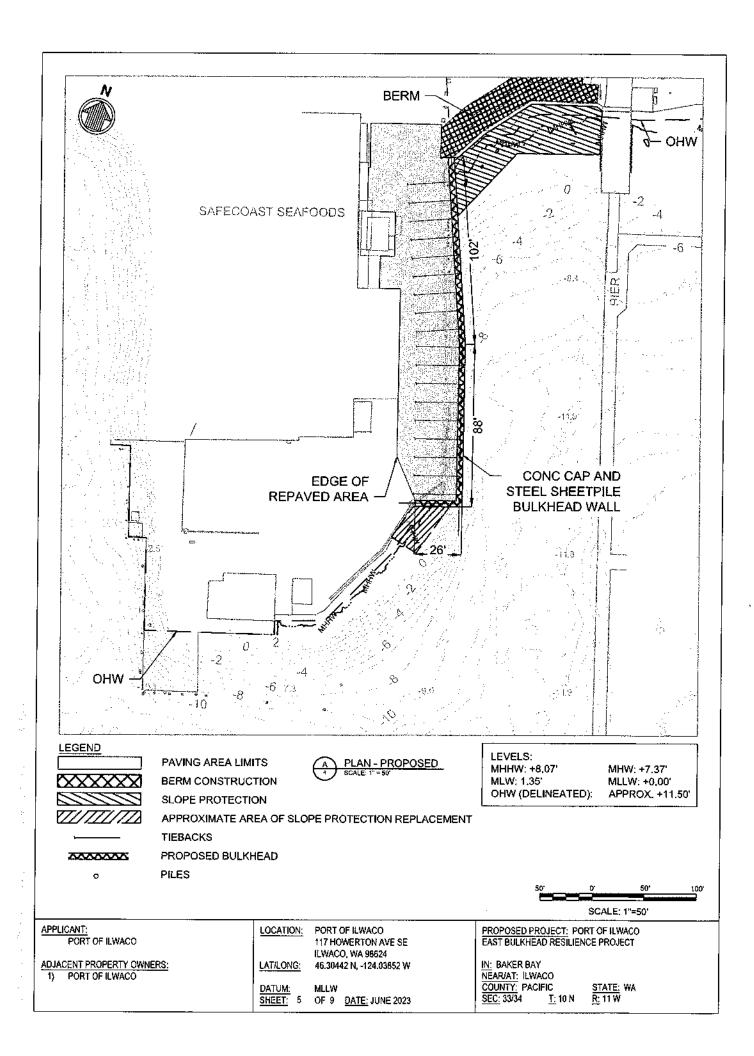
DATUM: SHEET: 3 OF 9 DATE: JUNE 2023 PROPOSED PROJECT: PORT OF ILWACO EAST BULKHEAD RESILIENCE PROJECT

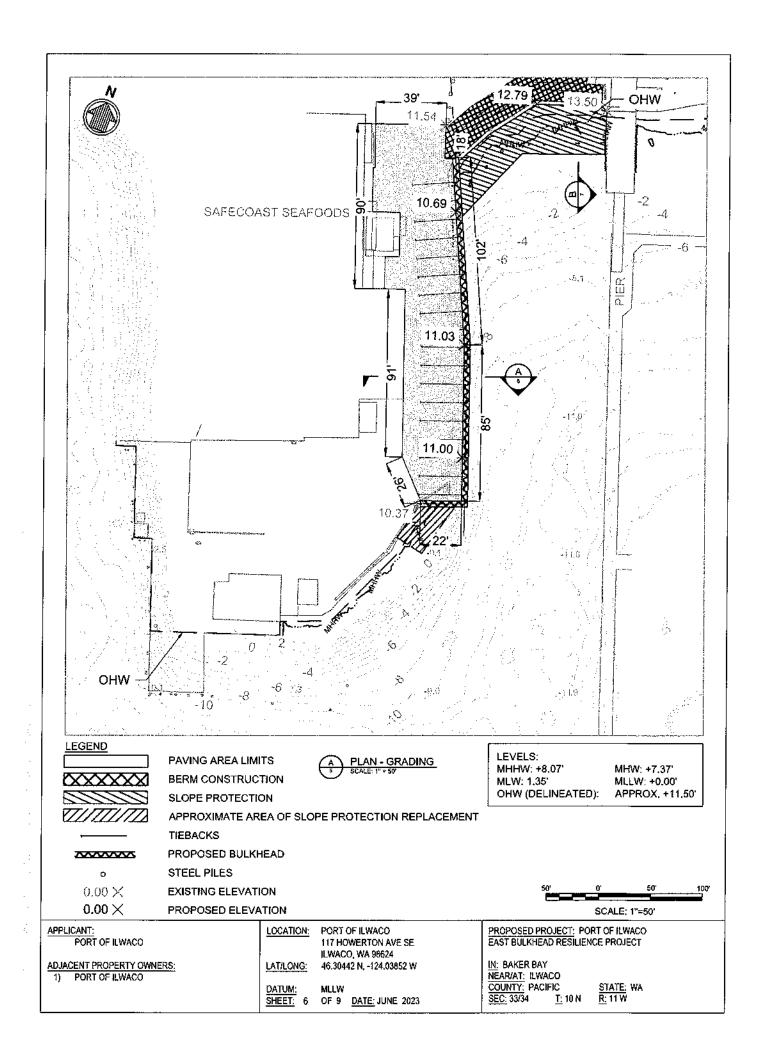
IN: BAKER BAY

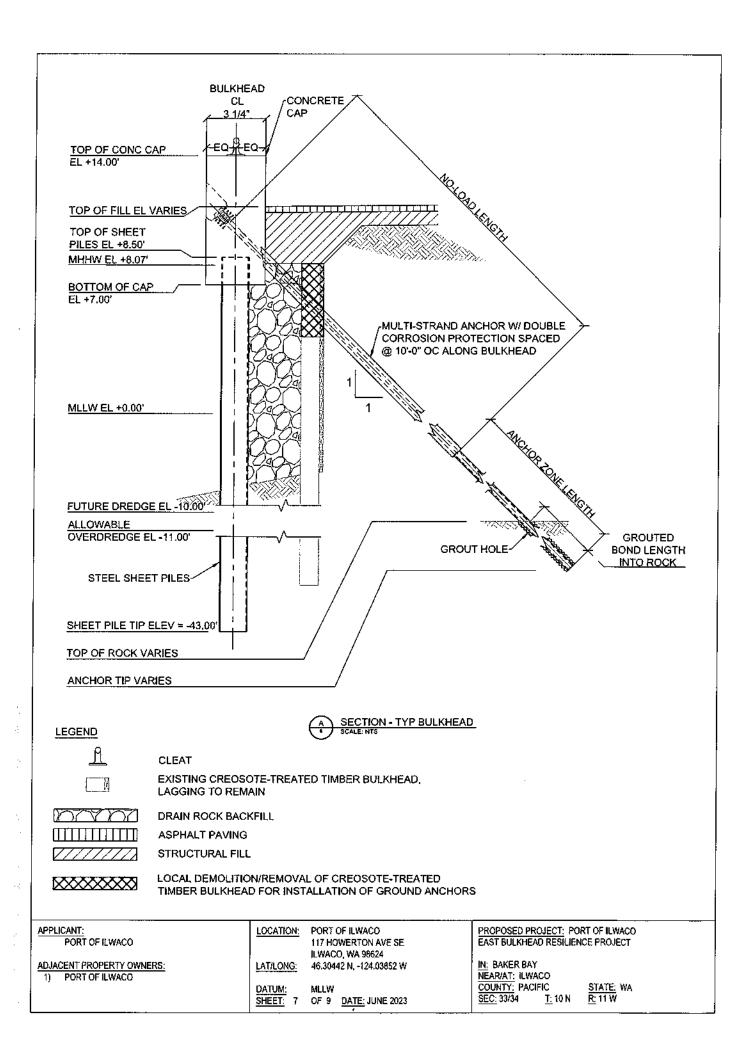
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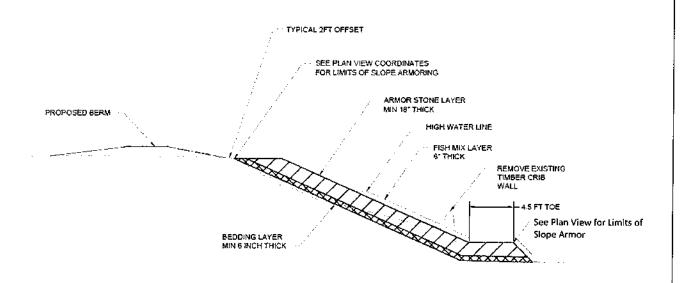
STATE: WA













APPLICANT:

PORT OF ILWACO

ADJACENT PROPERTY OWNERS:

PORT OF ILWACO

LOCATION:

PORT OF ILWACO

117 HOWERTON AVE SE

ILWACO, WA 98624

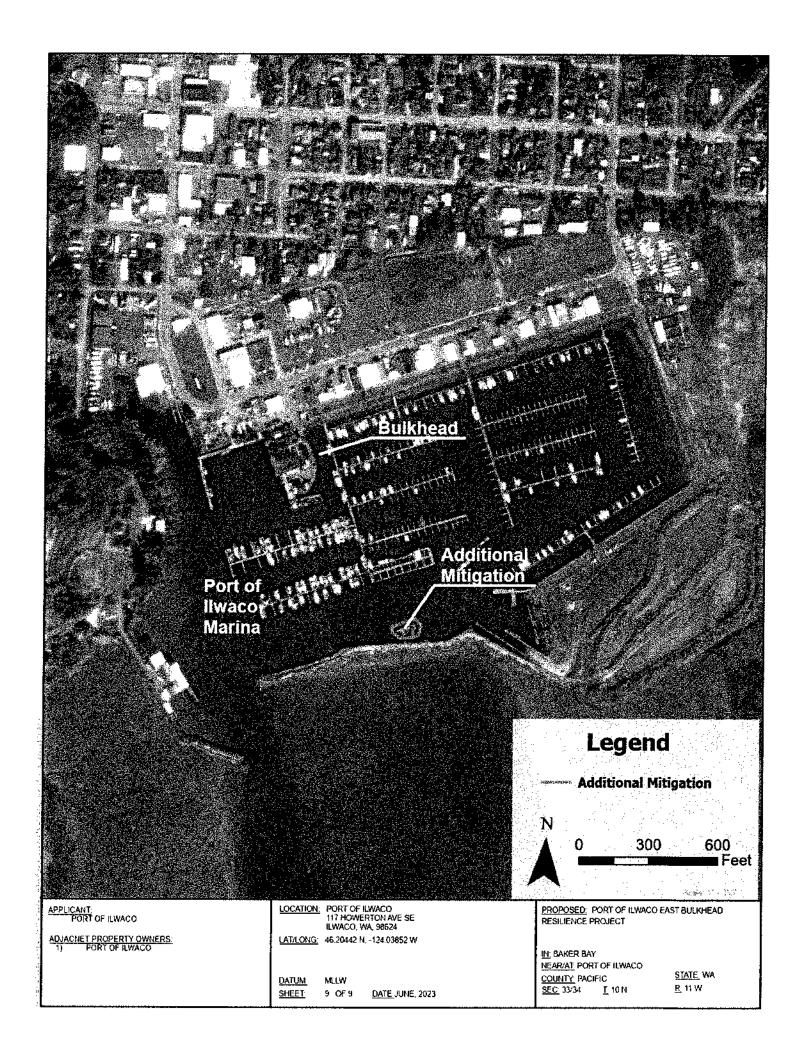
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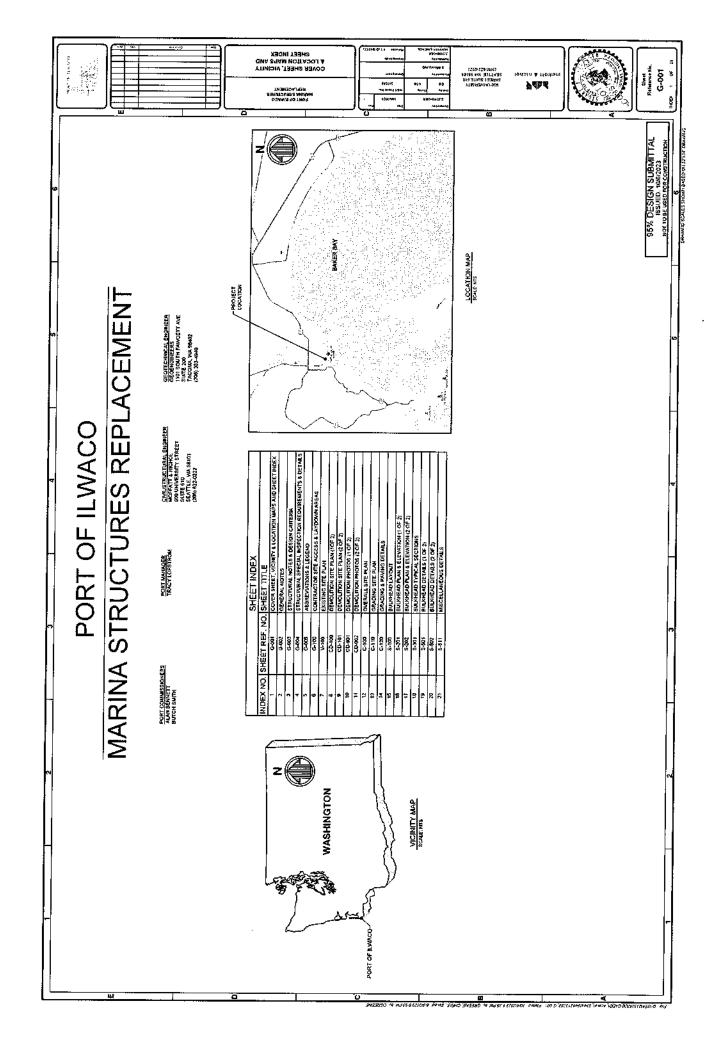
DATUM:

SHEET: 8 OF 9 <u>DATE</u>; JUNE 2023 PROPOSED PROJECT: PORT OF ILWACO EAST BULKHEAD RESILIENCE PROJECT

IN: BAKER BAY

NEAR/AT: ILWACO
COUNTY: PACIFIC
SEC: 33/34 T: 10 N STATE: WA R: 11 W





THESE NOTES CONTAIN GENERAL INFORMATION AND ARE NOT COMPLETE FOR CONSTRUCTION PROPOSES, VEHEN PROPOSED, VEHEN	Š	VEY NOTES: Enisting stre information shown on these drawings is based on survey inforwation provided by southan hydro, dated 13 april, 2022	PERMIT REQUIREMENTS. BEST MANAGEMENT PRACTICES (BMPS) AND TEMPORARY EXOSION & SEDIMENT CONTROL (TESQ): CONTRACTOR SINCE CONTRINIAL REDUCE PREMIT CONTROL (TESQ): LISTED BELOWARD BENINED IN THE SPECIFICATIONS. THE PROJECT STORM WATER	
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ONE-SECOND PERIOD, SIGH 1145 9 MODFIED PEAK GROUND ACCELERATION, PGAM × 0,79**6 g** Seismic **de**skon category = **D** BULKHEAD DESIGN CRITERIA (CONTINUED) WELDING MUST CONFORM TO AMS DL.1 MOORBIG TYPE I MILD WEATHER (UPC 4.199-03) WWO VELOCITY CURRENT VELOCITY WAYES CONFORM TO THE FOLLOWANG, JOH: 2°200 FB PAR OVDED 3°200 FB FOYDED HENR VICE FOYD DÉSIGN VESSEL (FISHING VESSEL) DISPLACEMENT LENOTH OVER ALL (LOA) 4 TON FORK LIFT WIND IASCE 7-16) BASIC WIND ON STRUCTURE EXPOSURE 0AOJ 24 ZAZ 10AO 030 ZO 18 1002.61 030 LO UNLOADED H9S RECTANGULAR HSS ROUND STEEL PILING ASD DESIGN: FACTOR OF SAFETY FOR BOND STREMGTH = 2.0 FOR STATIC COMMITTIONS, 1.5 FOR YELSMAC CONDITIONS, AMERICAN SOCIETY OF CIVIL EMBINEERS (ASCE) STANDARD 7-16. MINIMAMA DESIGN LOADS AND ASSOCIATED CRITERIA FOR BUILDINGS AND OTHER STRUCTURES. AMERICAM WELDING SOCIETY (AWS), AWS D1.1-2020. STRUCTURAL WELDING CODE - STEEL SUBMAT CROUTED THE BACK ARCHOAD DESIGN CERTIFIED BY A PROFESSIONAL ENJORGER LECHEROR IN THE STAFF OF REVENEMENTOR TO THE STAFF OF CORVENEMENTOR TO THE STAFF OF CORVENEMENT STAFF STAFF OF CORP. AND COCEPTAINGE CRITERIA IN ACCORDANCE WITH PTI RECOMMENDATIONS, THE BULKNEGO IS DESCORED FOR STATIC, SEISNIC, AND LIQUEFACTION LATERAL LOADING CONDITIONS AS STECHIED IN THE DECITECHNICAL ENGINEERING REPORT BY GEORNMERES INC. MOJOST 2027 WASHINGTON DEPARTMENT OF TRANSPORTATION (WISDOT), STANDARD SPECIFICATIONS FOR ROAD, BRIDGE, AND MUNICIPAL CONSTRUCTION, 2021. BULKHEAD DESKIN IS IN ACCORDANCE WITH US ARMY CORPS OF ENGINEERS DESIGN OF SMEET PAR WULLS (EM 1110-2-2504). THE GACK ANCHOR ULTHAKE BOND STRENGTH OF SOPSIFOR MURIALM & INCH DIAMETER ANCHOR. AMÉRICAN CONCRETE NISTITUTE (ACI) 318-14. BUILDING CODE REQUIREMENTS FOR STRUCTURAL CONCRETE & COMMENTARY. INTERNATIONAL CODE COMPET (ACC), INTERNATIONAL BUILDING CODE (IBC), 2018, US ARMY CORPS OF ENGINEERS - DESIGN OF SHEET PILE WALLS, EM 1110-2,2504 11. UFC 4-152-07, DESIGN SMALL CRAFT BERTHING FACILITIES, 1 SEPTEMBER 2012. CODES AND STANDARDS ALL DESIGN AND CONSTRUCTION SHALL COMPORM TO THE REQUIREMENTS OF THE FOLLOWING CODES AND STANDARDS. AWS DI. 42018, STRUCTURAL WELDING CODE - REINFORCING STEEL. AISC 360-16, SPECIFICATION FOR STRUCTURAL STEEL BUILDINGS. AWS DIG-2017, STRUCTURAL WELDING CODE - STAINLESS STEEL, ACI 101-20, SPECIFICATIONS FOR CONCRETE CONSTRUCTION 14. CRSH MANUAL OF STANDARD PRACTICE 29TH COTTION, 2018 6-€ UFC 4-159-03, DESIGN; MOORPIGS, 12 MARCH 2020. H\$20 DESIGN TRUCK (AASHTO) VEHICLE LIVE LOADS, SEE DIAGRAMS BELOW CONSTRUCTION LOAD CASE = 40 PSF STATIC LOAD CASE = 300 PSF SEISMIC LOAD CASE = 100 PSF POST SEISMIC LOAD CASE = 100 PSF BULKHEAD SURCHARGE LIVE LOADING ACTOSTALING NAMUAL MALKSP-20. BULKHEAD DESIGN CRITERIA 4IX 070 ÷ ₫ 2 ÷ H mi v.

SINUCTURAL SPECIAL INSPECTION SETMEMENTO S SINTED 05 47 to 357 HOER I OF 21 Sheet Relatence Ne. Q-004 todala A Halles Paba 95% DESIGN SUBMITTAL (SSUED: 10/6/2023 MOT TO BE USED FOR CONSTRUCTION A MINIMUIA OF THREE PRE-PRODUCTION OR VERFICATION TESTS SHALL BE PERFORMED TO 200% OF THE DESIGN Bond Strength. SUBINI GROUTED TIEJACK ANCHOR TESTING AND SPECIAL INSPECTION PROGRAM, CONTINUOUS SPECIAL. INSPECIATION IS ROQUINGED FOR TIEJACKA ANCHOR INSTALLATION, GROUTIAK, AND TESTING, SEE SPECIFICATION TIS 11 SEORIA ANCHORIS. AT A MINIMUM, PERFORMANCE TESTING OF OROUTED TIE-BACK ANCHORS MUST OCCUR ON THE FIRST THREE ANCHORS INSTALLED AND THEIR ON A MINIMUM OF TWO OF THE REMAINING ANCHORS. performance and proof tests must be accomplished in accordance with the post-tensioning Institute reconsistantions (PT, 2014). TABLE 1705,7 REQUIRED SPECIAL INSPECTIONS AND TESTS OF DRIVEN DEEP FOUNDATION ELEMENTS PERIODIC SPECIAL INSPECTION × × fable 1705,6 REQUIRED SPECIAL INSPECTIONS AND TESTS OF SOILS CONTINUOUS SPECIAL INSPECTION VERIFY USE OF PROPER MATERALS, DENSINES, AND LIFT THICKNESSES DURING PLACEMENT AND COMPACTION OF COMPACTED FILL. PERFORM CLASSIFICATION AND TESTING OF COMPACTED FILL MATERIALS. prior to placement of compacted file. Inspect Subgrade and veriey that site has been prepared properly. THE PACKET LOGATION TO PUMBRIESS, CONFINATIVE AND SIZE OF FRANKE RECORD NUMBER OF THE COUNTY FRANKE RECORD NUMBER OF THE TOWN TOWN TO ACHIEVE PENETRATIONS TO ACHIEVE TO ACHIEVE THE COUNTY AND THE TELEMENT. for steel elements perform additional special Inspections in accordance with <u>section tros.2</u> see quality Assurance inspection requirements of Aisc.340. DISPECT DRIVING OPERATIONS AND MAINTAIN COMPLETE AND ACCURATE RECORDS FOR EACH ELEMENT. VERIFY EXCAVATIONS ARE EXTENDED TO PROPER DEPTH AND HAVE REACHED PROPER SUPPORTING MATERIAL. FOR CONCRETE ELEMENTS AND CONCRETE-FILLED ELEMENTS PERFORM TESTS AND ADDITIONAL SPECIAL INSPECTIONS IN ACCORDANCE VATH <u>SECTION</u> 1705.3 VERBY ELEMENT MATERIALS, SIZES, AND LEMGTHS COUPLY WITH REQUIREMENTS. FOR SPECIALIY ELEMENTS, PERFORM ADDITIONAL INSPECTIONS AS DETERMINED BY THE REGISTERED DESIGN PROFESSIONAL IN RESPONSIBLE CHARGE. DETERMINE CAPACITIES OF TEST ELEMENTS AND CONDUCT ADDITIONAL LOAD TESTS, AS REQUIRED VERIFY MATERIAL 5 BELOW SHALLOW FOUNDATIONS ARE ADEQUATE TO ACHIEVE THE DESIGN BEARING CAPACITY. TIE-BACK ANCHORS TESTING AND INSPECTION IBC REFERENCE 1909.10 800 1808.9 1908 955<u>8</u> ASTM 0172 ASTM 031 AC| 318, 29,4, 25,12 101 316' 26. H.1.2(b) AC! 316. 19, 28.4.3, 26.4.4 AWS D1.4 AC; 318: 28,6,4 AC1318 17,8,2,4 AC1318, 17,8,2 ACI 318: 28:11.2 REFERENCEO STANDARD ACI 318, 17.6.2 ACI 316: 26.5.3-26.5.5 ACI 318: 26 S TABLE 1705.3 REQUIRED SPECIAL INSPECTIONS AND TESTS OF CONCRETE CONSTRUCTION THE ITEMS CHECKED WITH ANT INVIST BE RESPECTED IN ACCORDANCE WITH IBC
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PERIODIC SPECIAL INSPECTION

CONTRIDOUS SPECIAL RISPECTION

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SPECIAL INSPECTION NOTES

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2. PENMORGING BAR WELDING
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WELDS, MAXMUM S16" AND
B. RISPECT ALL OTHER WELDS.

INSPECT REINFORGEMENT, VERIFY PLACEMENT,

×

3. REMPORCING BAR WELDING

4. INSPECT ANCHORS POSTANSTALEDIN HARRIEND CONCERTE MANGESS. A. A. A. DIESTOR, ARCHORS INSTALLED IN HORESTOR, ARCHORS INSTALLED INCLED ORIENTATIONS TO RESIST SUSTANCED TRANSPOLICIONS B. MECHANICAL ANCHORS AND ADMÉSTIC ANCHORS AND

PRIOR TO CONCRETE PLACEMENT, FABRICATE SPECEMENS FOR STRENGHT

TESTS, PERFORM SLUMP AND AR CONTENT TESTS, AND DETERMINE THE TEMPERATURE OF THE CONCRETE,

5. VERIFY USE OF REQUIRED DESIGN MIX.

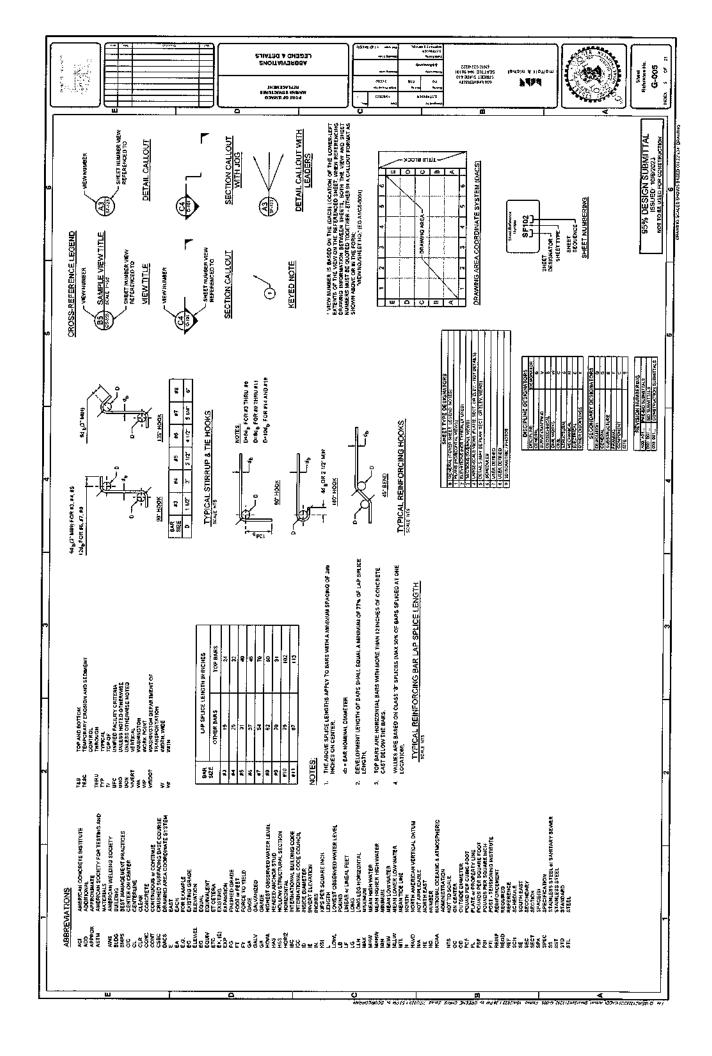
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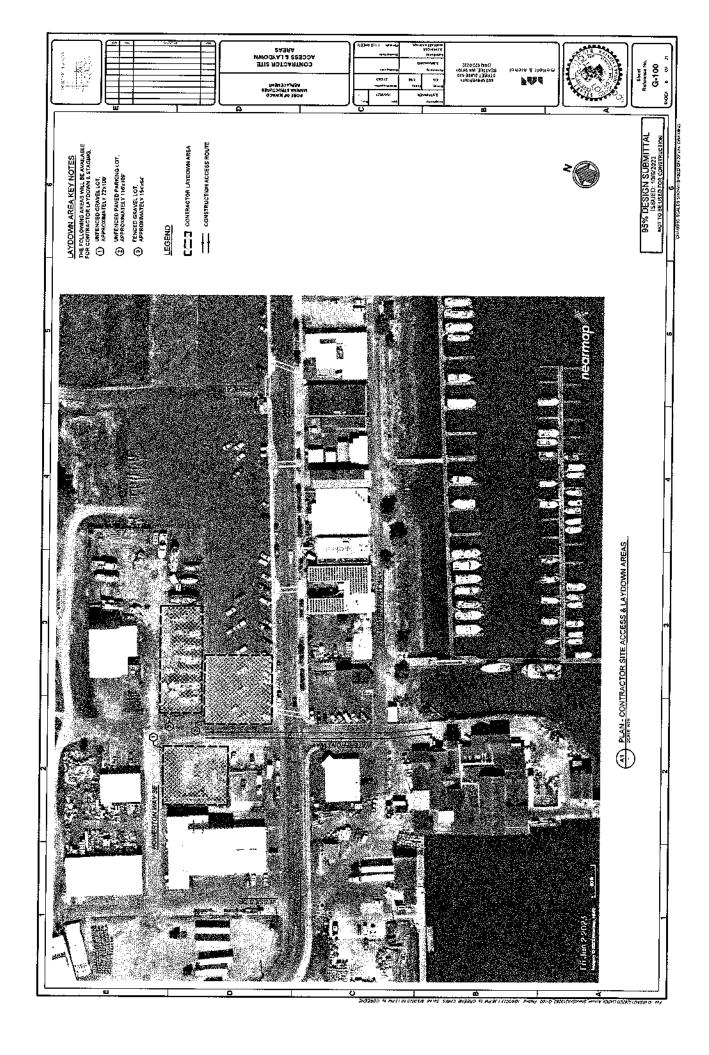
I. INSPECT FORMMORK FOR SHAPE LOCATION, AND DIMENSIONS OF THE CONCRETE MEMBER BEING FORMED

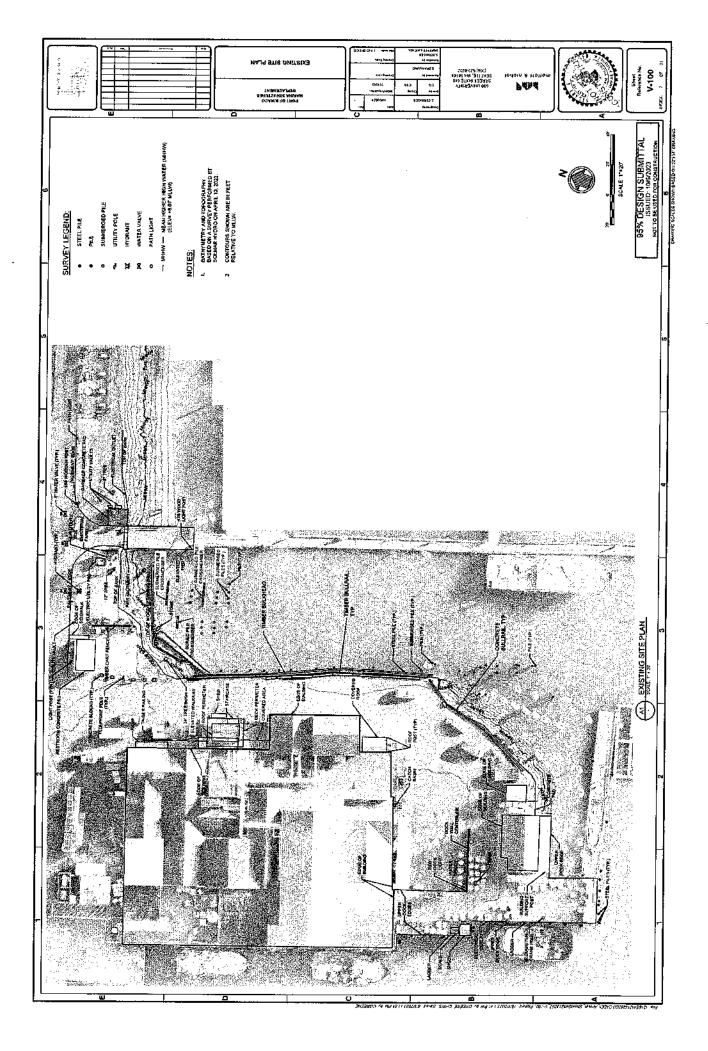
VERIFY IN SITU CONCRETE STRENGTH, PRIOR TO REMOVAL OF SHORES AND FORMS FROM BEAMS.

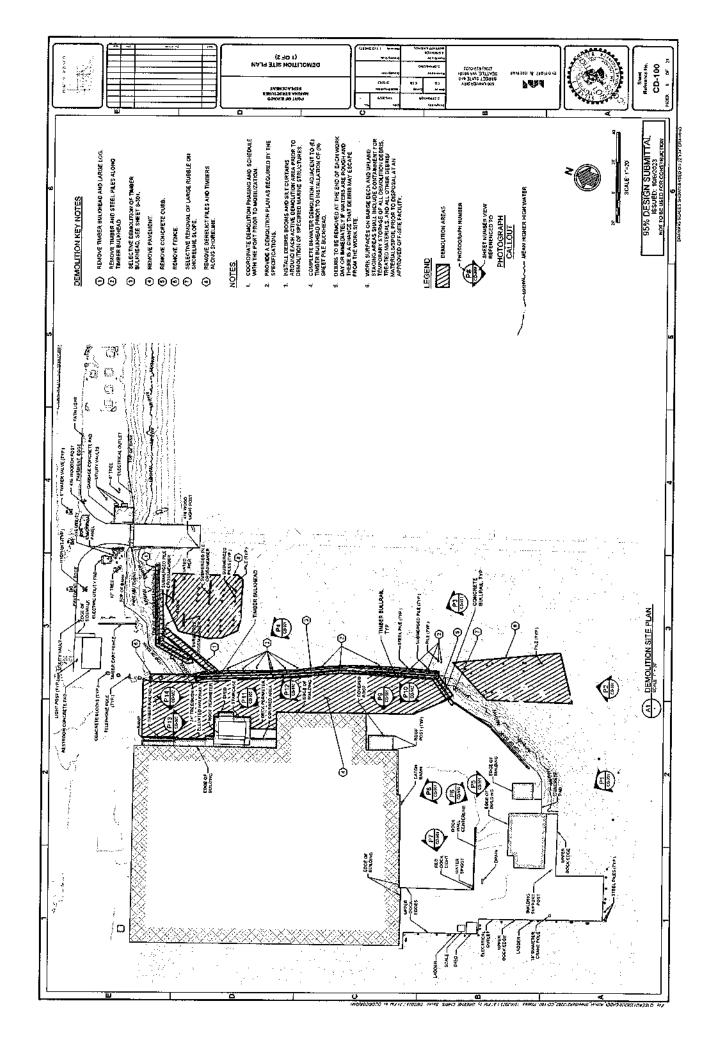
VERIFY MAINTENANCE OF SPECIFIED CURING TEMPERATURE AND TECHNIQUES.

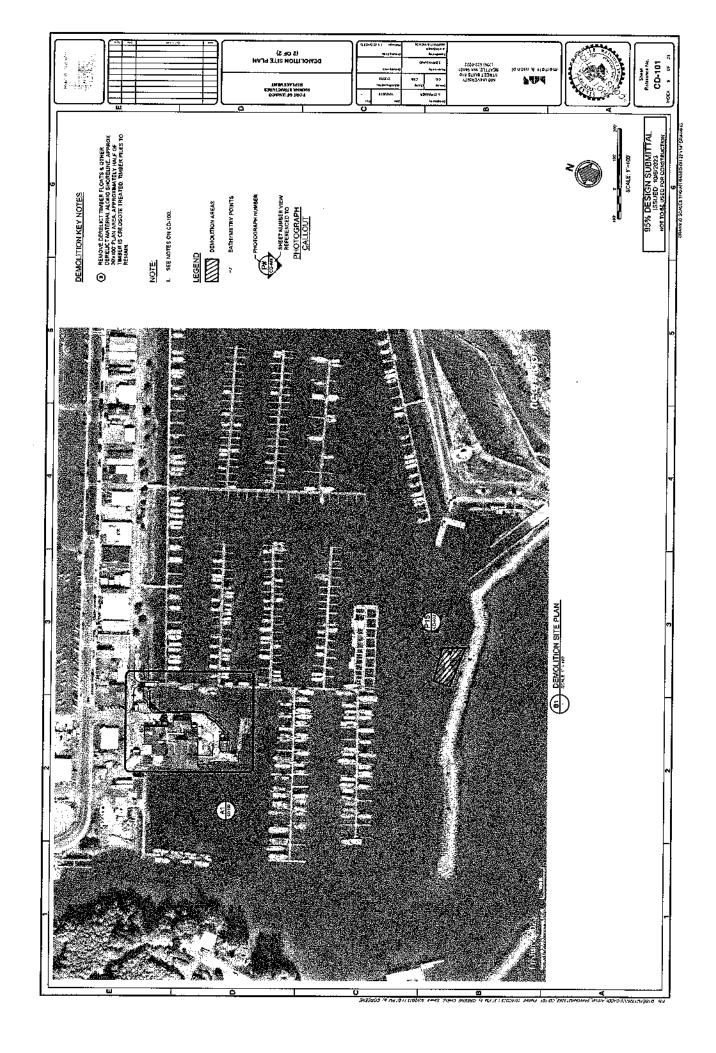
MSPECT CONCRETE PLACEMENT FOR PROPER APPLICATION TECHINQUES

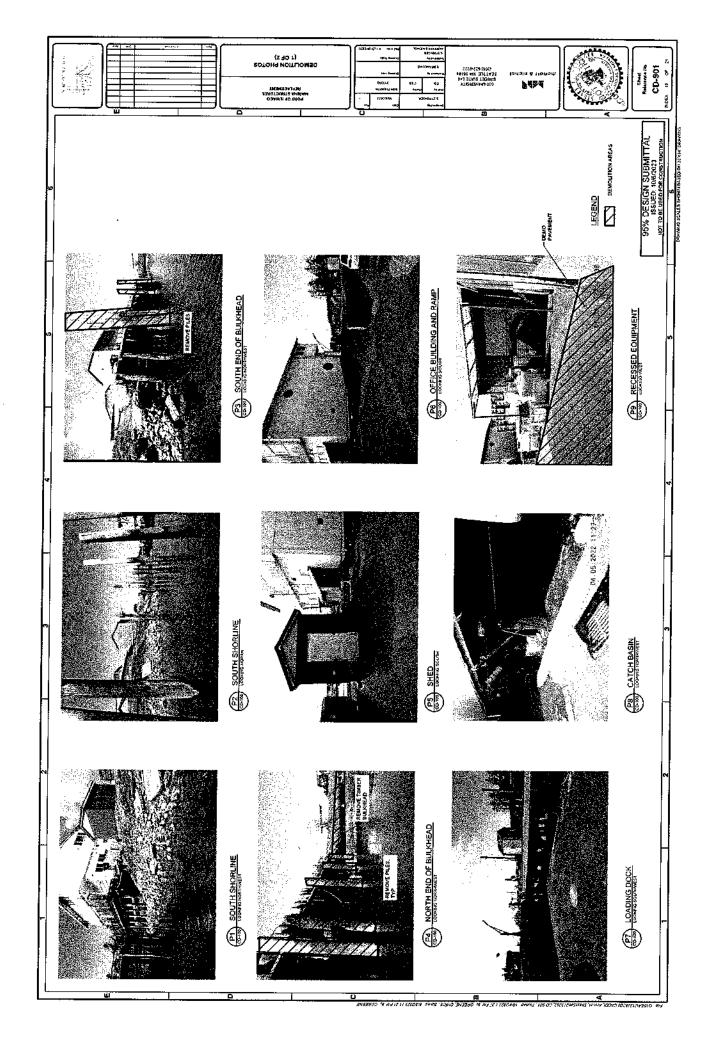


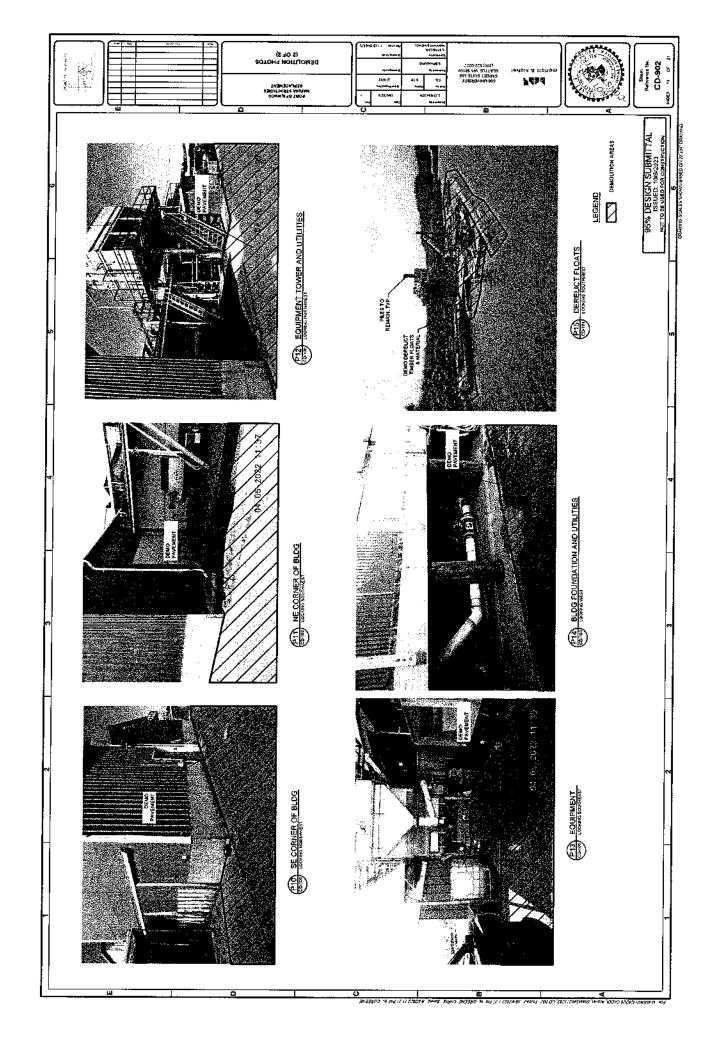


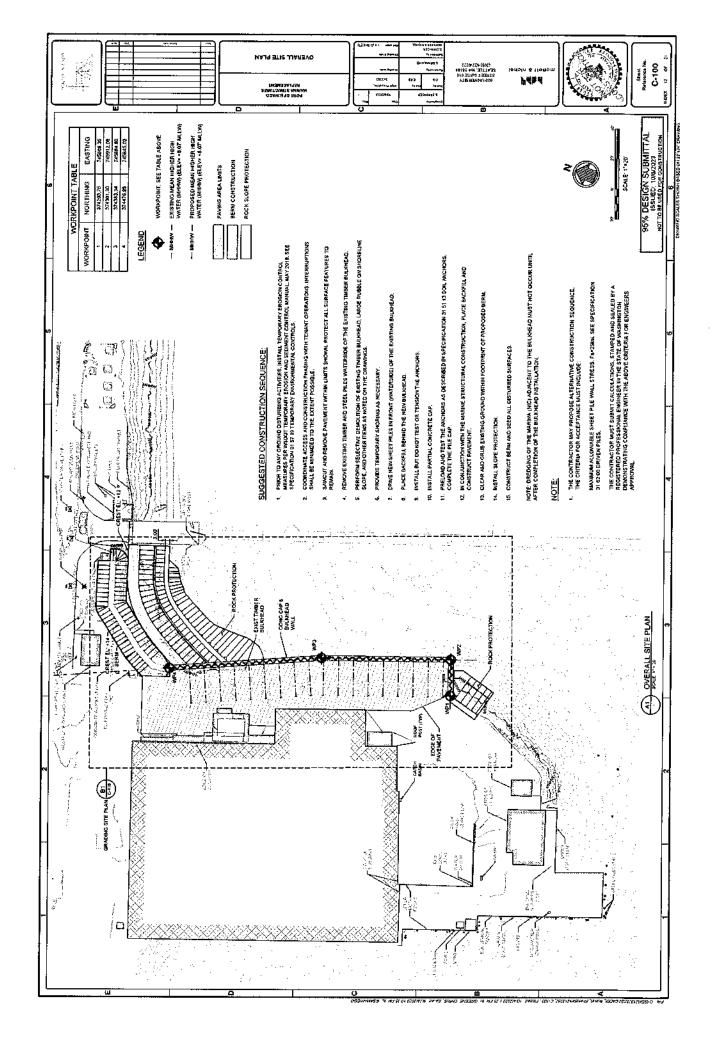


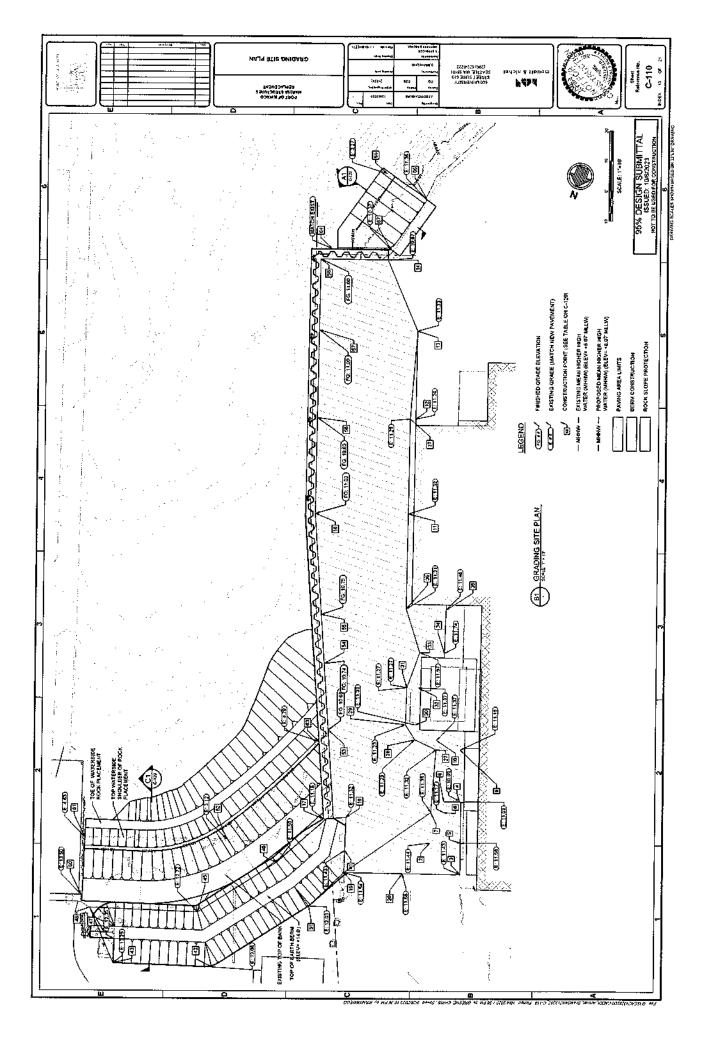


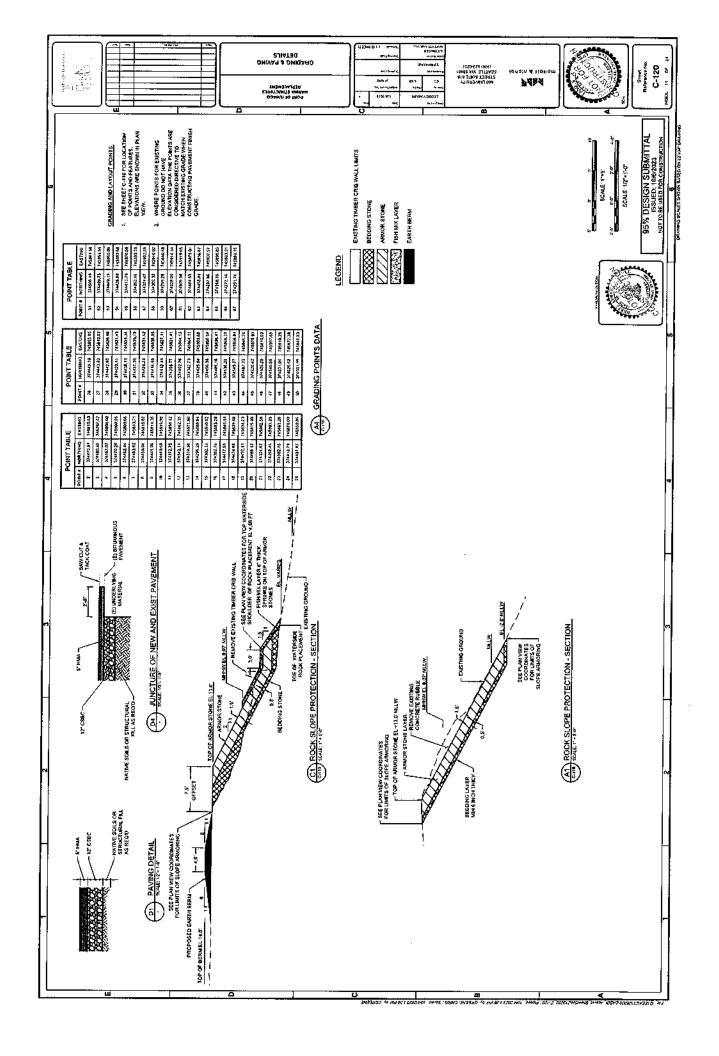


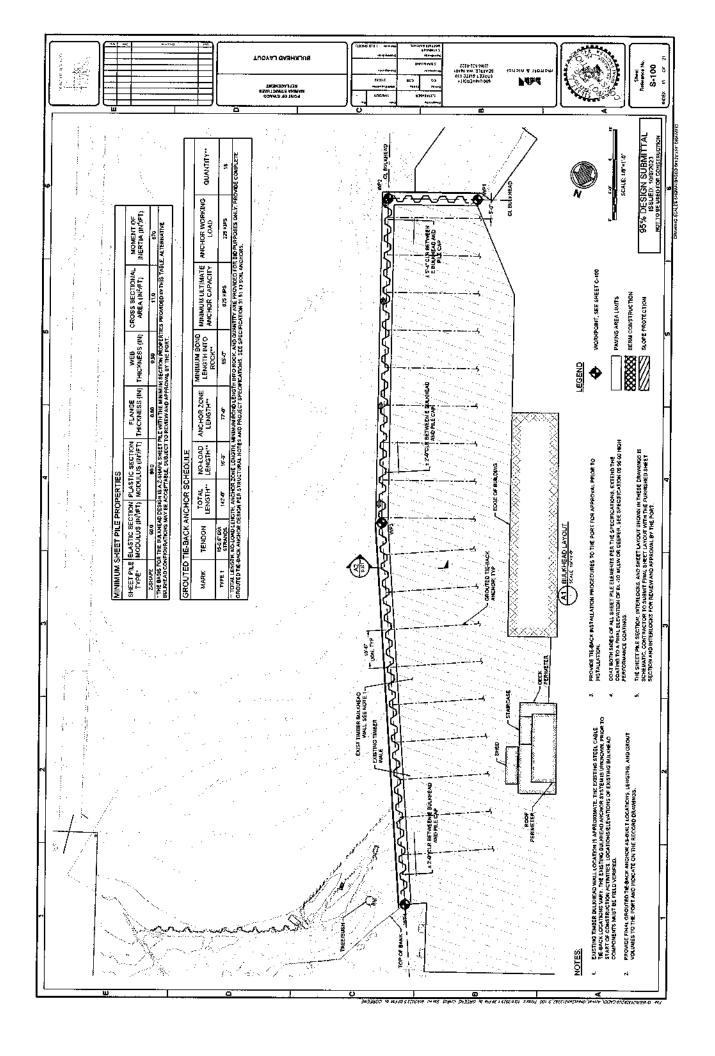


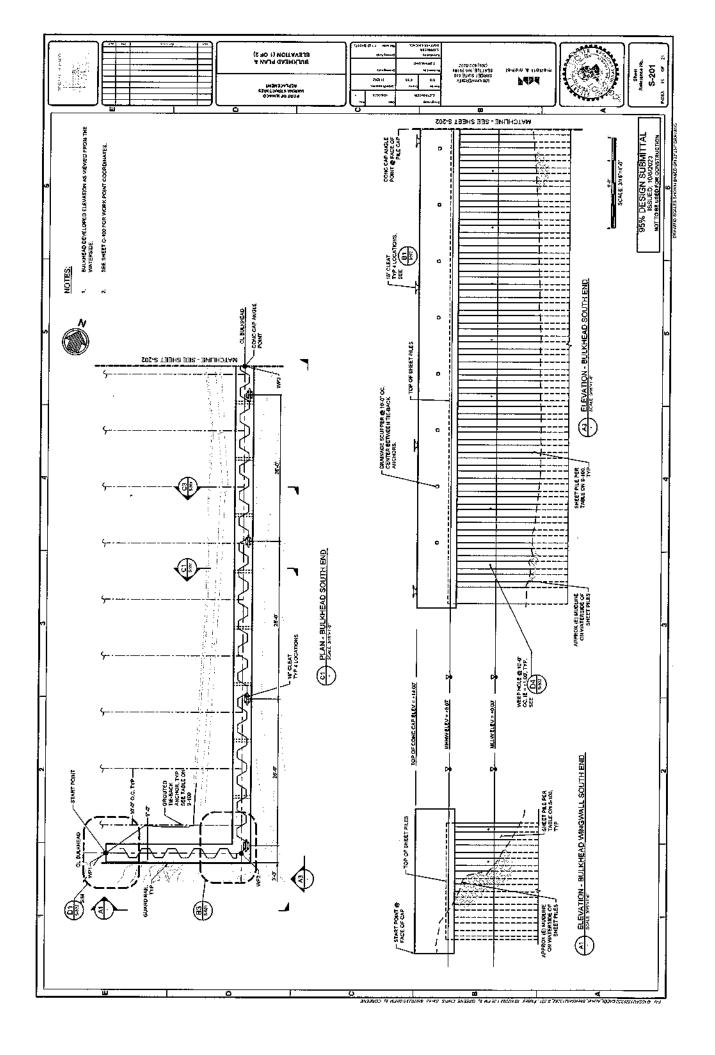


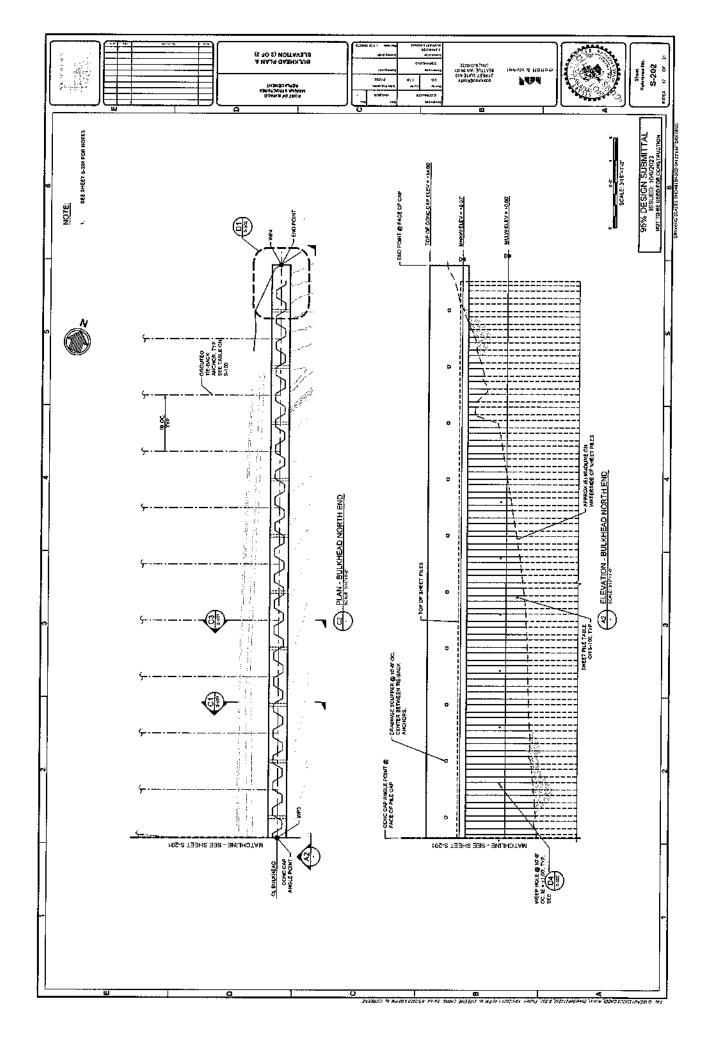


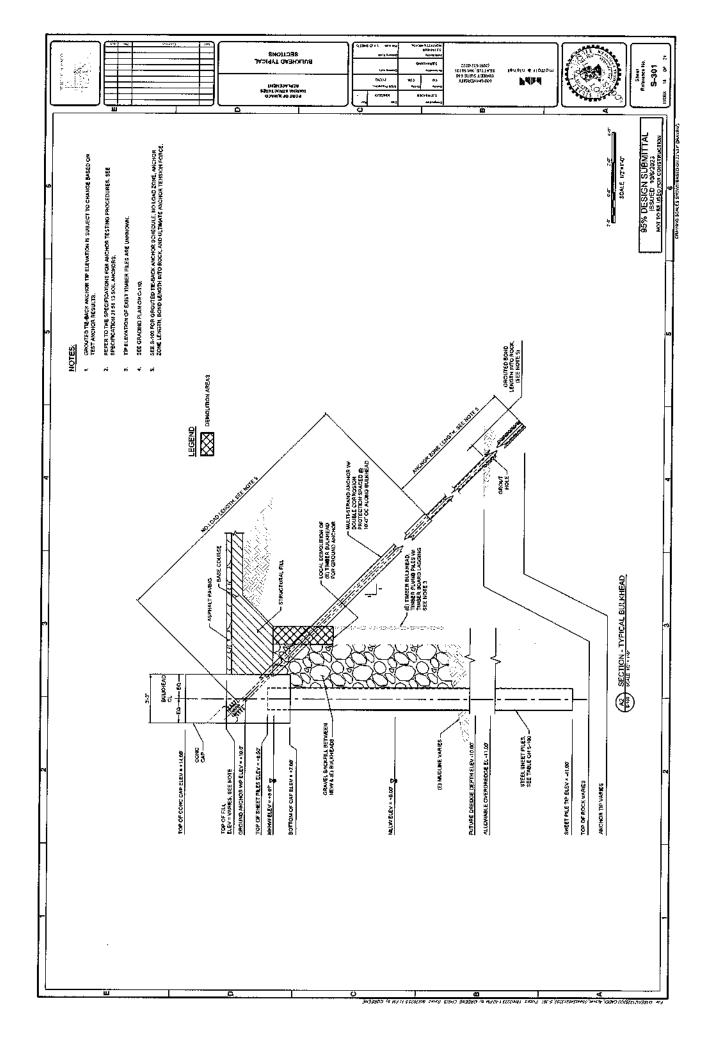


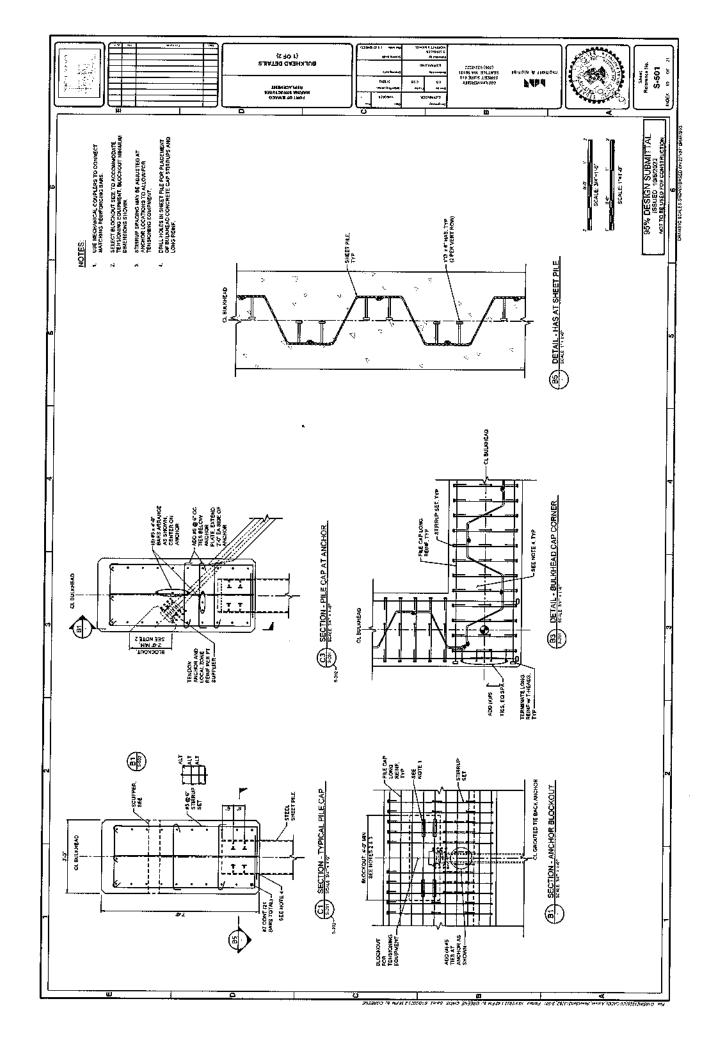


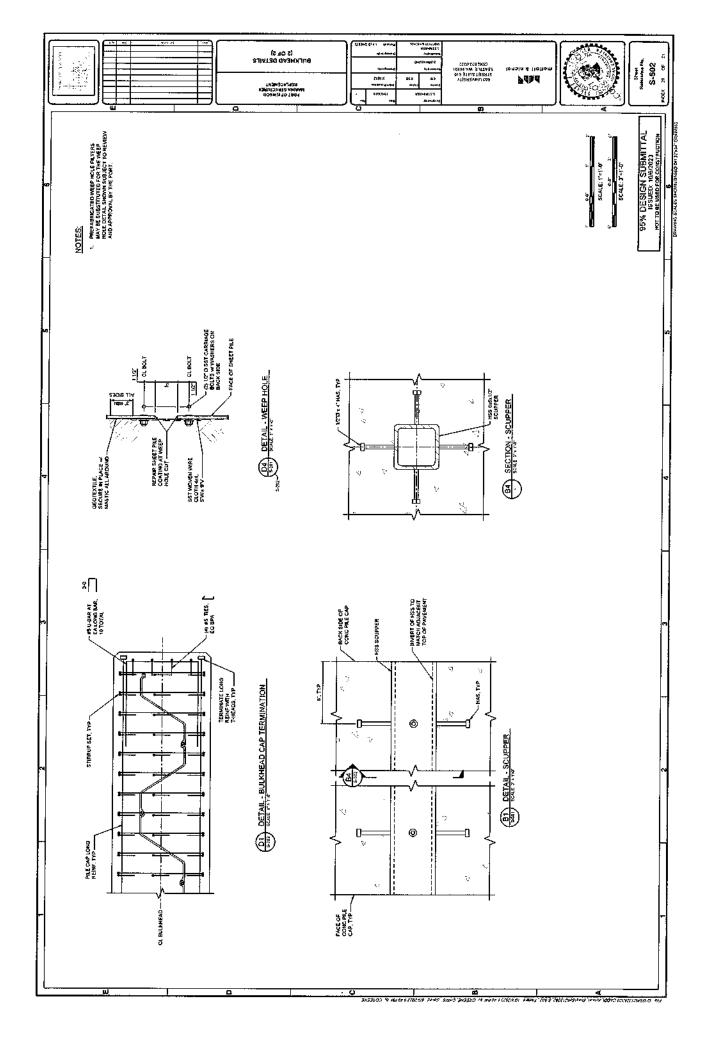


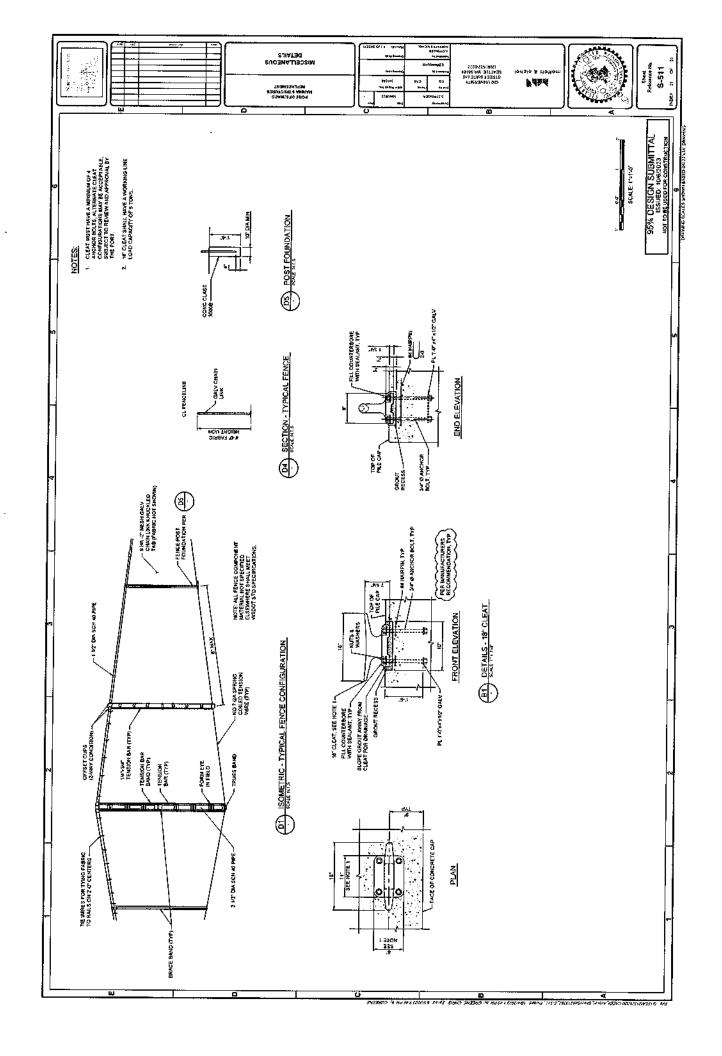














120 First Avenue North PO Box 548 • Ilwaco, WA 98624 Phone: 360.642.3145 Fax: 360.642.3155 www.ilwaco-wa.gov

CITY OF ILWACO NOTICE OF PUBLIC HEARING & STATE ENVIRONMENTAL POLICY ACT (SEPA) DETERMINATION OF NON-SIGNIFICANCE

NOTICE IS HEREBY GIVEN that the City of Ilwaco will hold a public hearing to consider the Shoreline Substantial Development Permit and Shoreline Conditional Use Permit for the Port of Ilwaco East Bulkhead Resilience Project. The Public Hearing will take place on December 14, 2023, at 11:00 a.m. at the Ilwaco Community Building Meeting Room, 156 N. First Street, Ilwaco, WA 98624. The Public Hearing can also be attended virtually using Zoom Meeting ID 385 864 1217. All public comments on this application must be received by the City no later than December 10, 2023, or citizens may provide written or oral comments at the hearing.

At its commercial fishing wharf, currently occupied by Safe Coast Seafoods, the Port of Ilwaco proposes to replace the failing east bulkhead with a sheetpile bulkhead, replace the slope protection to the north and south of the east bulkhead, and pave and regrade the upland wharf area directly landward of the east bulkhead to mitigate the effects of sea level rise. The proposed project is located at 117 Howerton Avenue SE on the following tax parcels: 73048003011, 73048003009 and 73031013000.

The project requires a Shoreline Substantial Development Permit, Shoreline Conditional Use Permit, and SEPA Determination pursuant to the City's Shoreline Master Program and WAC 197-11-800(2)(a)(i). Additional permits from other agencies with authority are also required, including, but not necessarily limited to: US Army Corps of Engineers Section 10/404 Permit, Washington Department of Fish and Wildlife Hydraulic Project Approval (HPA), Washington Department of Natural Resources Aquatic Use Authorization, and Washington Department of Ecology Coastal Zone Management Consistency determination.

The lead agency has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of the completed environmental checklist and other information on file with the lead agency. This Determination of Non-Significance is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date of issuance.

Project information can be found on file at Ilwaco City Hall, 120 First Avenue North, Ilwaco, WA 98624. To receive a copy of the decision, once made, or for information on appeals, contact us at the above address. Staff Contact: Holly Beller; treasurer@ilwaco-wa.gov; (360) 678-7817.

Date of issuance: November 8, 2023



120 First Avenue North PO Box 548 • Ilwaco, WA 98624 Phone: 360.642.3145

Fax: 360.642.3155 www.ilwaco-wa.gov

Determination of Non-Significance

PROJECT NAME: Port of Ilwaco East Bulkhead Resilience Project

APPLICANT NAME: Tracy Lofstrom (Port of Ilwaco Manager)

POINT OF CONTACT: Victoria England, Moffatt & Nichol

LOCATION OF PROPOSAL: 117 Howerton Avenue SE on the following tax parcels: 73048003011, 73048003009 and 73031013000.

DESCRIPTION OF PROPOSAL: At its commercial fishing wharf, currently occupied by Safe Coast Seafoods, the Port of Ilwaco proposes to replace the failing east bulkhead with a sheetpile bulkhead, replace the slope protection to the north and south of the east bulkhead, and pave and regrade the upland wharf area directly landward of the east bulkhead to mitigate the effects of sea level rise.

LEAD AGENCY: City of Ilwaco

THRESHOLD DETERMINATION: The lead agency, City of Ilwaco, has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) IS NOT required under RCW 43.21C.030(2)(c). This decision was made after reviewing the proposal and all supporting documents. This information is available to the public for review upon request at the City of Ilwaco Building and Planning Department, 120 First Avenue, Ilwaco, WA 98624 between the hours of 8:00 a.m. and 5:00 p.m. Monday through Friday, excluding holidays.

This Determination of Non-significance is issued using the DNS process in WAC 197-11-340; there is a comment period and an appeal period on the DNS.

() There is no comment period for the DNS.

(X) This DNS is issued under 197-11-340(2); the lead agency will not act on this proposal for 14 days.

Date of Determination and Issuance: November 8, 2023

Deadline for Submitting Comments: 5:00 P.M. on November 22, 2023

Deadline for Submitting Appeals: 5:00 P.M. on November 22, 2023

Responsible Official:

Holly Beller, City Administrator 120 First Avenue Ilwaco, WA 98624 360-642-3145 treasurer@ilwaco-wa.gov

Signature: Coll of the

COMMENT PERIOD: In accordance with WAC 197-11-340, there is a fourteen-calendar day comment period for this Determination of Non-significance. Comments on the DNS addressing environmental issues shall be submitted to the City of Ilwaco Building and Planning Department at the address below.

Date: November 8, 2023

APPEALS: Appeals to the above Determination of Non-Significance must be filed with the City of Ilwaco Building and Planning Department within fourteen calendar days of the date of issuance above. Appeals must be filed in writing with the City of Ilwaco Building and Planning Department at the address below. In accordance with IMW 15.50.140, Decisions of the hearing examiner may be appealed to the Pacific County Superior Court in accordance with Section 15.08.160 of this title. Appeals shall set forth the specific reason, rationale, and/or basis for the appeal.

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to <u>all parts of your proposal</u>, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the <u>SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D)</u>. Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements —that do not contribute meaningfully to the analysis of the proposal.

A. Background [HELP]

- 1. Name of proposed project, if applicable: Port of Ilwaco East Bulkhead Resilience Project
- 2. Name of applicant: Tracy Lofstrom, Port Manager
- 3. Address and phone number of applicant and contact person:

Applicant Address: PO. Box 307

Ilwaco, WA 98624

Applicant Phone Number: (360) 642-3143
Applicant email: tlofstrom@portofilwaco.org

Contact Person: Victoria England (Moffatt & Nichol) 206-622-0222, email

vengland@moffattnichol.com

4. Date checklist prepared: June 2023

Agency requesting checklist: City of Ilwaco

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

Start Date: November 2024 End Date: February 2025

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

No.

- 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 (JARPA) and affiliated JARPA sheets (plans)
 - Biological Evaluation (Moffatt & Nichol 2022) Submitted to NMFS December 2022
 - 2023 Geotechnical Report GeoEngineers
 - 2022 Eelgrass Survey GeoEngineers
 - Cultural Resources Survey Willamette CRA
 - NEPA EA (in progress)
 - Mitigation Sequencing Analysis and No Net Loss Narrative (Moffatt & Nichol 2023)
- 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.

No other known applications are pending for governmental approvals of other proposals directly affecting the property covered by this proposal.

- 10. List any government approvals or permits that will be needed for your proposal, if known.
 - US Army Corps of Engineers (USACE) Section 10/404
 - NOAA/NMFS: Endangered Species Act/Magnuson Stevenson Act consultation

- USFWS: Endangered Species Act
- City of Ilwaco: SEPA Determination
- City of Ilwaco Shoreline/Critical Areas Conditional Use Permit
- City of Ilwaco Master Planning Permit
- WA Dept. of Fish and Wildlife Hydraulic Project Approval (HPA)
- Dept. of Ecology (DOE) Coastal Zone Management (CZM) consistency
- WA Dept. of Natural Resources (DNR) Project Aquatic Use Authorization
- 11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The proposed Port of Ilwaco East Bulkhead Resilience Project (herein referred to as the 'Project') consists of three primary elements;

- Replacing the failing creosote treated timber east bulkhead with an anchored steel sheetpile bulkhead;
- 2. Repairing slope protection north and south of the bulkhead; and,
- 3. Paving and grading the upland wharf area directly landward of the bulkhead to mitigate the effects of sea level rise.

As part of the above elements, creosote-treated timber that configures the external wall of the existing bulkhead and retaining wall will be removed along with select derelict creosote-treated piles next to the bulkhead. Additional derelict creosote piles and cross members will be removed from the slip adjacent to the bulkhead as mitigation for project impacts resulting from drainage rock fill placement between the existing bulkhead and the new bulkhead necessary to maintain water pressure equilibrium on both sides of the bulkhead. The removal of creosote from the marine environment will also mitigate impacts associated with the riprap shoreline protection that is proposed to replace the derelict creosote treated timber revetment/retaining wall and associated elements. A fish mix gravel layer will be placed between HTL and the toe of the riprap on the surface of the rip rap slope protection at the head of the slip to provide beach nourishment and habitat improvements for fish passing through the marina. Additionally, an approximately 2,510 sf derelict structure and associated floating timber debris will be removed from the south portion of the marina as mitigation for project impacts.

The proposed Project is required for improved the safety, efficiency, and reliable use of the wharf. The Port is a key hub for commercial fishing, seafood and aquaculture processing, and recreation activities that greatly benefit the regional economy. The commercial fishing wharf, operated by Safe Coast Seafoods, is one of the most active in the state, landing roughly \$14 million in commercial seafood each year. Repair of the bulkhead wall is critical to ongoing operations at Safe Coast Seafoods. In its current condition, the bulkhead is in serious structural condition and at risk of failing. Recent biweekly

and monthly measurements have been completed to monitor ongoing movement of the bulkhead. The monitoring has recorded movement along 13 monitoring points along the face of the bulkhead ranging from approximately 0.06 inch to up to 0.31 inch waterward i since monitoring began in November 2022. The monitoring indicates that the bulkhead is the process of active failure. Frequent flooding due to high water levels from "king tides" and severe winter storm surges further threaten the structural capacity of the bulkhead.

Bulkhead failure would shut down cargo operations at the Port and negatively impact a wide variety of businesses in maritime and non-maritime sectors including Safe Coast Seafoods. The shutdown of the Safe Coast site due to failure of the bulkhead would lead to a series of economic impacts for many more workers and businesses and the region. Bulkhead failure would also adversely affect the Port of Ilwaco Marina operations, likely fully blocking at least one slip from use and potentially causing damage to adjacent float structures and tenant vessels. Until this project is completed, the facility is capacity-limited and at risk. The main access driveway to Safe Coast Seafoods has been blocked based on recommended load limitations in an effort to minimize vibration and load resulting from vehicles and machinery using the driveway located adjacent to the failing bulkhead. Without the Project, the eventual closure of the wharf will have cascading negative transportation and economic impacts for the region.

The Project would also serve the following purposes and provide the following benefits:

- The replacement bulkhead will serve as the initial phase to increase the facility's climate change/sea level rise resiliency and will help protect wharf facilities from flooding. The bulkhead will be designed to accommodate the planned increase to wharf/Safe Coast facility ground floor elevations in the future.
- The top of the embankment elevation to the north of the bulkhead will be raised to approximately +14 feet (mean lower low water) MLLW and the existing creosote-treated retaining wall will be replaced with rip rap to improve shoreline protection. The increase to top of bank elevation will mitigate sea level rise impacts between the bulkhead and the marina access pier to the east.
- Re-grading and re-paving of the upland area behind the bulkhead wall will facilitate positive drainage away from the Safe Coast Seafoods buildings and help protect the facilities during flood events.
- The bulkhead replacement would prevent the shoreline from failing into a portion of the active Port of Ilwaco Marina, which would impact operations in the marina and potentially damage adjacent float structures and tenant vessels, if any, present at the time of failure.
- The new bulkhead will be designed to accommodate the temporary mooring of fishing vessels which will allow vessels to unload/load equipment and product and improve efficiencies at the Safe Coast Seafoods facility. Under existing conditions, the timber bulkhead is used for temporary mooring but cannot currently be used for loading/unloading of vessels due to its existing poor, unstable, deteriorating condition.
- The Project will allow trucks to drive safely on the bulkhead again, which will improve the
 efficiency of cargo transfer operations and improve the port's competitiveness. The adjacent

roadway has been closed to vehicle access due to load limitations recommended based on the poor condition of the existing bulkhead, including measurements exhibiting ongoing movement of the failing bulkhead waterward as observed during monitoring episodes from November 2022 to the present.

The removal of creosote-treated wood (north slip revetment, derelict piles and cross members, and portions of the existing bulkhead as safely able) from the marine environment will provide water quality benefits. Placement of a layer of fish mix gravel over the rip rap shoreline protection to be placed on the slope at the head of the adjacent slip.

The following is a more detailed description of the project elements.

Bulkhead Replacement

Construction sequencing for the proposed bulkhead replacement will likely be as follows:

- Localized demolition of the existing bulkhead wall
- Installation of the new steel sheet pile wall just waterward off the existing bulkhead.
- Placement of drainage rock between the existing bulkhead wall and new bulkhead wall

The majority of the existing timber bulkhead will be abandoned in place behind the replacement bulkhead in order to protect the existing buildings at the Safe Coast Seafoods facility, as complete removal of the existing timber bulkhead will undermine the stability of the soil behind the bulkhead and the adjacent building foundations threatening Safe Coast buildings, infrastructure, and operations. Portions of the existing creosote-treated bulkhead will be removed as feasible. Localized bulkhead demolition will likely consist of removal of the rotten top several feet of the existing creosote-treated timber piles above the timber wale location. This local demolition will take place above mean higher high water (MHHW). In addition, there may be localized notching of the bulkhead wall to accommodate the installation of the new tie-back ground anchors. Approximately twelve (12) 12-inch diameter creosote treated timber piles and three (3) 12-inch diameter steel pipe piles that are located directly waterward of the existing timber bulkhead will be removed. These piles will be removed by either pulling them out directly using a chain or with a vibratory hammer depending on the Contractors preferred means and methods. The piles will be cut at the mudline if complete removal is not possible or the piles break. Upland demolition will consist of removal of the existing pavement and surface features.

Post-localized demolition, a new steel sheet pile bulkhead wall will be installed in front of the existing timber bulkhead. The bulkhead wall will not increase in length. The top elevation of the new bulkhead wall will be approximately three feet (ft) higher than the existing top of bulkhead to accommodate high tides and sea level rise. It is anticipated that the steel sheet piles will be driven using a vibratory hammer. The option for impact proofing will also be included in the event that difficult driving conditions are encountered. The sheet pile wall will be approximately 225 linear feet (lf) and the sheet pile tip elevation will be approximately -40 to -50 feet MLLW. The top of the bulkhead pile cap will be set at an elevation of +14.0 feet MLLW.

The replacement bulkhead will include approximately 20 grouted ground anchors extending from the cast-in-place concrete pile caps down to the bedrock layer below the site. The grouted ground anchors will be either high strength steel strands or steel bars that are connected to the pile caps and driven at an approximately 1:1 angle to elevation -70 to -80 feet MLLW. The anchor tie backs will be grouted for a minimum of 25 feet into the underlying siltstone unit (top elevation approximately -57 feet MLLW). The ground anchors will be installed using either land-based equipment or from a barge depending on the Contractors preferred means and methods. The anchor holes will be drilled with a full-length casing. All drill spoils will be contained and prevented from entering marine waters. The anchor holes will be filled with grout using a tremie tube and then pressure grouted after the anchor tendons are installed. The anchors will be tensioned after all anchors have been installed and have reached the required grout and concrete strengths. The cast-in-place concrete pile cap will then be completed. The pile caps will be cast-in place in the dry and uncured concrete will not be allowed to come in contact with waters of Baker Bay.

The sheet pile placement in front of the existing bulkhead will result in an approximately 2- to 5-foot space between the existing bulkhead and the new bulkhead sheet piles. The area between the existing structure and the new bulkhead will be backfilled with drainage rock to allow for water to flow in and out of the soil supporting the Safe Coast Seafood facility. It is anticipated that approximately 450 cubic yards of free draining drainage rock backfill will be placed between the existing timber bulkhead and the replacement bulkhead (Table 1). The drainage rock will likely be placed using a clamshell operating from a barge. The clean drainage rock will be obtained from a commercial supplier. This placement will minimize the risk of slope failure that removing the existing structure would exacerbate. The drainage rock placement in the space between the existing and replacement bulkhead structures will minimize additional pressure from trapped groundwater behind the new bulkhead.

The new bulkhead (including drain rock installation area),and pile cap, will have a footprint of approximately 1,400 square feet (sf) in marine waters (measured below the high tide line [HTL]) (Table 1). Of the overall footprint in marine waters, 1,000 sf will come into contact with the bottom substrate and have benthic habitat impacts.

Slope Protection

Approximately 350 sf (approximately 14 cubic yards [cy]cy) of concrete debris shore protection from the shoreline to the south of the bulkhead wall will be removed to accommodate the bulkhead wall replacement (Table 1). Approximately sixteen (16) 12-inch diameter creosote timber piles associated with the existing timber retaining wall will be removed from the shoreline along the north end of the bulkhead wall. The existing creosote-treated timber retaining wall to the north of the bulkhead will be completely removed. The associated piles will be removed by either pulling them out using a chain or with a vibratory hammer depending on the Contractors preferred means and methods. The piles will be cut at the mudline if complete removal is not possible or the piles break during removal.

The 350 sf/14 cy of concrete rubble shore protection removed from the south portion of the project to accommodate installation of the new bulkhead will be replaced with approximately 35 cy of riprap in the same 350 sf area to maintain slope stability (Table 1). Of the 35 cy placed along the shoreline, 30 cy occurs below the HTL (Table 1).

One hundred ninety-eight (198) cy (2,200 sf) of riprap, 172 cy (1850 sf) of which occurs below the HTL, will be placed on the embankment to the north of the new bulkhead to replace the existing creosote treated timber retaining wall and provide shore protection (Table 1). The rip rap slope protection will serve as grade transitions from the vertical bulkhead structure to the adjacent sloped shorelines to the north and south. A layer of fish mix rock will be placed over the riprap located below HTL to provide fish habitat. The embankment height will be increased to an elevation of approximately +14.0 feet, MLLW between the bulkhead and the marina access pier to the east. The purpose of the increased embankment height is to mitigate the effects of sea level rise.

Paving and Grading

Upland paving and grading will be completed behind the bulkhead wall to mitigate sea level rise following construction of the new bulkhead. The driveway will be regraded and repaved with structural fill base course and asphalt pavement. This will consist of 8,000 sf of asphalt repaving. The upland area will be re-graded and re-paved to maintain positive drainage away from the Safe Coast Seafoods buildings. The bulkhead will be outfitted with scuppers to allow rainwater to flow into the marina rather than pooling along the driveway or draining toward the Safe Coast facilities.

Fill Impacts and Creosote Removal

Approximately twenty eight (28) creosote-treated timber piles (12-inch diameter) and three (3) steel piles (12-inch diameter) will be removed adjacent to the existing bulkhead and as part of the north shoreline rehabilitation. In addition, the Port proposes to remove approximately thirty-six (36) 12-inch diameter derelict creosote- treated timber piles and 3 creosote-treated timber pile caps as mitigation for the fill and benthic habitat impacts created by the placement of the new bulkhead wall in front of the existing structure. This will result in approximately 64 total creosote-treated timber piles and 3 steel piles being removed along with approximately 70 lf of creosote treated timber retaining wall, and 40 lf of creosote treated timber pile caps.

A derelict timber structure approximately 2,510 sf in area will be removed as part of the mitigation for project impacts. This will result in decreasing overwater coverage in the south portion of the marina at the location of the existing derelict timber structure.

Approximately 1,400 sf of fill below the HTL will result from the placement of the new bulkhead and drainage rock backfill (Table 1). Of the overall footprint, 1,000 sf will come into contact with the bottom substrate and result in benthic habitat impacts.

North shoreline riprap placement will occur in a 2,200 sf area, 1,850 sf of which occurs below the HTL and would result in benthic habitat impacts (Table 1). Approximately 750 sf of this will occur waterward of the existing retaining wall. A 6-inch layer (approximately 34 cy) of fish mix gravel will be placed below HTL to provide beach nourishment and improved habitat for fish passing through the marina.

South shoreline riprap placement will not result in any additional benthic habitat impacts (Table 1). The removal of approximately sixty-four (64) 12-inch creosote-treated timber piles, three (3) 12-inch steel piles, 70 If of timber retaining wall, and 40 If of derelict creosote-treated timber pile caps, will restore approximately 165 sf of benthic habitat (Table 1) and remove approximately 34 tons of creosote from the marine environment.

Table 1. Approximate Fill Impacts

Activity	Fill below HTL (sf)	Fill below HTL (cy)	Fill above HTL (sf)	Fill above HTL (cy)
Bulkhead wall and shoreline protection in:	stallation			
Sheetpile installation	400 sf	80 cy	0 sf	0 су
Bulkhead drainage rock placement	1,000 sf	450 cy	0 sf	Осу
Rip-rap shore protection and Fish Mix placement (north shoreline)	1,850 sf	172 cy	350 sf	26 cy
Concrete rubble removal (south shoreline)	-350 sf	-14 cy	-50 sf	-2 cy
Rip-rap replacement (south shoreline)	350 sf	30 cy	50 sf	5 cy
Subtotal	3,250 sf	718cy	350sf	29cy
Structure removal			•	·
Pile removal adjacent to existing bulkhead	-12 sf	-6 cy	0 sf	0 су
North shoreline- retaining wall removal	-85 sf	-12 cy	0 sf	О су
Derelict pile/timber removal	-68 sf	-12 cy	0 sf	0 cy
Derelict Timber structure/debris removal – South Marina	-2,510 sf	-350 cy	0 sf	0 cy
Subtotal	-2,675 SF	-380 cy	0 sf	0 cy
Creosote removal from the Environment	34 tons			

See the attached JARPA and JARPA sheets for additional Project description information.

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 Project occurs at the Port of Ilwaco on the southwest coast of Washington State, located just inside the Columbia River bar at the Pacific Ocean. The Port area generally consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard. The Project site at the Port of Ilwaco is the bulkhead along the east side of the commercial fishing wharf (herein referred to as 'wharf') occupied by Safe Coast Seafoods. The approximate coordinates of the Of the Project site are latitude 46.30498 and longitude -124.0408.

The wharf is an earth filled structure on the east side and pile supported on the west side. The wharf is protected by a timber bulkhead along the eastern limits of the wharf. To the north of the bulkhead wall, the shoreline is protected by a low creosote-treated timber retaining wall and large log. To the south of the bulkhead wall, shoreline protection consists of riprap and concrete rubble. The Safe Coast Seafoods buildings are located on the wharf. The Port and marina area is protected by a rubble breakwater.

B. Environmental Elements [HELP]

1.	Earth [help]	
a.	General description of the site:	

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other

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

The Project is located in-water and along the shoreline at an existing bulkhead wall and riprap shoreline. The bulkhead wall is located in a gradually sloping soft bottom habitat.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The Project is located in-water and along the shoreline. The predominant soil types are sandy silt and silt (GeoEngineers 2023).

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

Pavement settlement has been observed on the adjacent landward driveway and bulkhead movement measured during monthly monitoring (late 2022/early 2023) and access is now restricted based on those conditions and the condition of the deteriorating bulkhead. The 2022 geotechnical investigations (GeoEngineers, 2023) indicate that the project site is underlain by figure fiable soil.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Installation of the bulkhead wall, drainage rock, and riprap will result in approximately 3,250 sf of fill in marine waters (measured below the high tide line [HTL]). Approximately 1,000 sf of the fill would come into contact with the bottom substrate and result in permanent impacts to the existing aquatic soft bottom habitat.

Fill and benthic habitat impacts are anticipated to be offset by the removal of steel piles, and creosote-treated wood (piles, structures, and revetment), and floating debris from the marine environment and placement of a layer of fish mix over the riprap shore protection to be placed at the head of the slip as beach nourishment. The removal of approximately sixty-four (64) 12-inch creosote timber piles, three (3) 12-inch steel piles, 70 if of timber retaining wall, 2,510 sf of floating timber debris and 40 if of derelict timber pile caps, will restore approximately 2,675 sf of benthic habitat and remove approximately 890 cy or 34 tons of creosote from the marine environment (Table 8e). The removal of creosote-treated wood is anticipated to provide both water quality and benthic habitat improvements. A layer of fish mix rock/gravel (approximately 34 cy) will be placed over the portion of riprap placed below the HTL at the head of the slip to improve habitat and provide beach nourishment to that portion of shoreline. No additional mitigation is anticipated to be required and a mitigation plan has not been developed. See the attached Biological Evaluation, Section 1.3.4, and JARPA, Table 8e for additional information on fill impacts.

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

Regrading and repaving the drive behind the bulkhead will be completed as part of the project. Proper best management practices (BMPs), such as silt fence and/or straw wattles will be used to provide a physical barrier to avoid and minimize erosion and prevent construction debris from entering nearby marine surface waters. The completed project will restore existing pavement and ongoing use will not result in erosion potential. The proposed Project will stabilize the wharf and improve shoreline stability to the north and south of the bulkhead.

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

Upland repaving and regrading will be completed behind the bulkhead wall to mitigate sea level rise. The driveway will be regraded and repaved with structural fill base course and asphalt pavement. This will consist of 8,000 sf of asphalt repaving. The repaving will be completed in an a currently paved area except where the new drain rock will be placed between the new and existing bulkheads. There will be an increase to existing impervious surfaces of approximately 1,250 sf that includes the new bulkhead cap and the paved area surfacing the area between the existing bulkhead and the new bulkhead to accommodate regrading of the access driveway adjacent to the bulkhead.

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

Not applicable. The Project is not anticipated to contribute to erosion.

2. Air [help]

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

The project will return normal operations along the driveway, bulkhead and marina slip adjacent to the bulkhead. Commercial fishing vessels, recreational vessels, employee vehicles and delivery trucks will continue to access the site.

Construction

Short-term construction-related air quality impacts and emissions could include dust from pavement work, which could cause temporary, localized increases in the ambient concentrations of fugitive dust and suspended particulate matter (PM) during repaving/regrading the adjacent drive. Construction activities will require the use of diesel-powered vessels and trucks, and other equipment such as generators and compressors. This equipment would emit air pollutants that could slightly degrade local air quality in the immediate vicinity of construction activities. These emissions would be temporary and localized. Some construction activities could also cause odors detectable to some people in the vicinity of the activity, especially during pavement repair operations. Such odors would be short-term and localized.

Operations and Maintenance

Maintenance and rehabilitation of the existing infrastructure will reestablish operational efficiency and will allow accommodation of the intended vessel traffic for which the terminal was originally approved and operated. This project does not expand the operational footprint of the seafood facility or marina nor does it result in an increase in vessel traffic relative to previous operations.

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

There are no off-site sources of emissions or odors that may affect the Project.

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

Impacts from elevation emissions are anticipated to be minimal and short-term. Measures to reduce emissions are not proposed.

- 3. Water [help]
- a. Surface Water: [help]
 - 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 Project is located at the Port of Ilwaco Marina in Baker Bay near the mouth of the Columbia River.

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 occurs in-water and along the shoreline of Baker Bay within the Ilwaco Marina. See the project description in the Question 11 response and the attached JARPA and JARPA sheets.

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.

See 1e above. Installation of the bulkhead wall, drainage rock and riprap will result in approximately 3,050 sf of fill in marine waters (measured below the HTL). Approximately 1,200 sf of the fill would come into contact with the bottom substrate and result in permanent impacts to the existing aquatic soft bottom habitat.

Derelict creosote piles and structures present in the adjacent slip will be removed, restoring 165 sf of benthic habitat and removing approximately 20 tons of creosote from the marine environment which will improve the habitat conditions of the marina and lift its value from current conditions. The creosote treated timber revetment and debris present at the head of the adjacent slip will be removed and riprap will be placed as shore protection associated with raising the elevation of the top of the slope as part of sea level rise resilience. The north slip riprap area will be surface with fish mix rock to improve the habitat over the area of new riprap placed from the HTL down.

Additionally, floating timber debris will be removed from the south portion of the marina as part of proposed project mitigation. This will remove approximately 2,510 sf of overwater coverage present in that portion of the marina.

Fill and benthic habitat impacts are anticipated to be offset by the removal of steel piles, and creosote-treated wood (piles, structures, and revetment), and floating debris from the marine environment and placement of a layer of fish mix over the riprap shore protection to be placed at the head of the slip as beach nourishment. The removal of approximately sixty-four (64) 12-inch creosote timber piles, three (3) 12-inch steel piles, 70 If of timber retaining wall, 2,510 sf of floating timber debris and 40 If of derelict timber pile caps, will restore approximately 2,675 sf of benthic habitat and remove approximately 380 cy or 34 tons of creosote from the marine environment (Table 8e). The removal of creosote-treated wood is anticipated to provide both water quality and benthic habitat improvements. A layer of fish mix rock/gravel (approximately 34 cy) will be placed over the portion of riprap placed below the HTL at the head of the slip to improve habitat and provide beach nourishment to that portion of shoreline. No additional mitigation is anticipated to be required and a mitigation plan has not been developed.

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

No, the Project will not require surface water withdrawals or diversions.

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

Yes. The Project occurs at the Port of Ilwaco on the north shore of Baker Bay near the mouth of the Columbia River. See the attached JARPA sheets.

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.

There will be no discharge of waste materials to surface waters. Please see the avoidance and minimization measures (AMMs) and Best Management Practices (BMPs) in the attached Biological Evaluation and JARPA.

- b. Ground Water: [heip]
 - 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No. Groundwater will not be withdrawn for drinking water or other purposes.

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.

Waste material will not be discharged into the ground.

c. Water runoff (including stormwater):

 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 Project only proposes the replacement of a bulkhead wall, repair of slope protection, and paving and grading the upland wharf area. The driveway will be regraded and repaved with structural fill base course and asphalt pavement. This will consist of 8,000 sf of asphalt repaving. The upland area will be re-graded and re-paved to maintain positive drainage away from the Safe Coast Seafoods buildings. The bulkhead will be outfitted with scuppers to allow rainwater to flow into the marina rather than pooling along the driveway or draining toward the Safe Coast facilities.

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

No. Waste materials would not enter ground or surface waters. Please see the AMMs and BMPs in the attached JARPA and Biological Evaluation.

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

See c.1) above. The upland area will be regraded and repaved to maintain positive drainage away from the Safe Coast Seafoods buildings. Scuppers will be added to the new bulkhead to allow stormwater to drain off of the adjacent drive, away from the Safe Coast buildings. Existing stormwater drains off the drive via sheetflow.

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

Please see the AMMs in the attached JARPA and Biological Evaluation.

- 4. Plants [help]
- a. Check the types of vegetation found on the site:

deciduous tree: alder, maple, aspen, other
evergreen tree: fir, cedar, pine, other
X_shrubs (head of the adjacent slip)
X_grass (head of the adjacent slip)
pasture
crop or grain
Orchards, vineyards or other permanent crops.
wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
water plants: water lily, eelgrass, milfoil, other
other types of vegetation

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

Vegetation and terrestrial habitat conditions are limited within the Project area. The site is in an industrial area and is largely devoid of terrestrial vegetation. The Project would occur on an

existing wharf and associated bulkhead wall, retaining wall, and riprap shoreline. Little to no terrestrial and riparian habitat occurs here. The mudline at the base of the existing bulkhead is largely unvegetated and consists of a silty sand, sandy silt slope with riprap extending on the shore slope to the north and south of the bulkhead.

The upland area adjacent to the bulkhead is a paved driveway servicing the Safe Coast Seafood facility. Existing vegetation that could be removed or impacted by the Project consists of short-statured ruderal species behind the existing bulkhead wall and in viable spaces along the riprap shoreline. Upland vegetation observed along the shoreline during a 2022 site survey included clover species (*Trifolium species*), Japanese knotweed (*Polygonum cuspidatum*), various grasses, dandelion (*Tatxasum officinale*), and creeping buttercup (*Ranunculus repens*) (Geoengineers 2022).

A 2022 eelgrass survey was completed and observed that there is no eelgrass on or adjacent to the project site (GeoEngineers 2022). Eelgrass beds exist within the marina area, but do not occur within the Project footprint (GeoEngineers 2022). The eelgrass bed is not anticipated to be impacted by the proposed Project and is likely ephemeral in nature since the marina is periodically dredged for maintenance dredging under a separate permit. No wetlands or streams were identified within the marina.

- c. List threatened and endangered species known to be on or near the site. No threatened and endangered plant species were observed on our near the site. Vegetation and terrestrial habitat conditions are limited within the Project area. The site is in an industrial area within an active marina that serves recreational boating and commercial fishing vessels and is largely devoid of terrestrial vegetation. The Project would occur on an existing wharf and associated bulkhead wall, retaining wall, and rip rap shoreline. Little to no terrestrial and riparian habitat occurs here. The mudline at the base of the existing bulkhead is largely unvegetated and consists of a silty sand, sandy silt slope with rip rap extending on the shore slope to the north and south of the bulkhead. The upland adjacent to the bulkhead is a paved driveway servicing the Safe Coast Seafood facility. Existing vegetation consists of short-statured ruderal species behind the existing bulkhead wall and in viable spaces along the rip rap shoreline. Upland vegetation observed along the shoreline during a 2022 site survey included clover species (Trifolium species), Japanese knotweed (Polygonum cuspidatum), varios grasses, dandelion (tatxasum officinale), and creeping buttercup (Ranunculus repens) (GeoEngineers 2022).
- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

Little to no terrestrial and riparian habitat occurs here. Vegetation that occurs within the project area and could be impacted during construction mainly consists of invasives. Substantial impacts to vegetation are not anticipated and measures to preserve or enhance vegetation are not proposed.

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

Japanese knotweed (*Polygonum cuspidatum*), dandelion (*tatxasum officinale*), and creeping buttercup (*Ranunculus repens*) are known to occur at the site.

5. Animals [help]

a. <u>List</u> any birds and <u>other</u> animals which have been observed on or near the site or are known to be on or near the site.

Examples include: See bold

birds: hawk, heron, eagle, **songbirds**, other: mammals: deer, bear, elk, beaver, other:

fish: bass, salmon, trout, herring, shellfish, other _____

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

The species in the table below have the potential to occur within the Project vicinity. See the attached Biological Evaluation for additional information.

ESA-Listed Species with Potential to Occur Within the Project Action Area

Species	ESU/DPS	Scientific Name	Agency	Federal Status	Critical Habitat
Chinook	Lower Columbia River ESU	Oncorhynchus tshawytcha	NMFS	Threatened	Occurs in Project Area
Salmon	Snake River fall-run ESU			Threatened	
	Snake River spring/summer-run ESU			Threatened	
	Upper Columbia River spring- run ESU			Endangered	
	Upper Willamette River ESU			Threatened	
Chum Salmon	Columbia River ESU	O. keta	NMFS	Threatened	Occurs in Project Area
Coho Salmon	Lower Columbia River ESU	O. kisutch	NMFS	Threatened	Occurs in Project Area
Sockeye Salmon	Snake River ESU	O. nerka	NMFS	Endangered	Occurs in Project Area
Steelhead	Lower Columbia River DPS	Onocorhynchus myskiss	NMFS	Threatened	Occurs in Project Area
	Middle Columbia River DPS			Threatened	
	Snake River Basin DPS			Threatened	
	Upper Columbia River DPS			Threatened	
	Upper Willamette River DPS			Threatened	
Green sturgeon	Southern DPS	Acipenser medirostris	NMFS	Threatened	Occurs in Project Area
Eulachon	Southern DPS	Thaleichthys pacificus	NMFS	Threatened	Occurs in Project Area
Sea turtles	Leatherback	Dermochelys coriacea	NMFS	Endangered	None in Project Area
Killer Whale	Southern Resident	Orcincus orca	NMFS	Endangered	None in Project Area

Species	ESU/DPS	Scientific Name	Agency	Federal Status	Critical Habitat
Humpback Whale	Central America DPS	Megaptera novaeangliae	NMFS	Endangered	None in Project Area
	Mexico DPS			Threatened	None in Project Area
Bull Trout	N/A	Salvelinus confluentus	USFWS	Threatened	None in Project Area
Western Snowy Plover	N/A	Charadrius nivosus nivosus		Threatened	None in Project Area
Marbled Murrelet	N/A	Brachyramphus marmoratus	USFWS	Threatened	None in Project Area
Streaked Horned Lark	N/A	Eremophila alpestris strigata	USFWS	Threatened	None in Project Area

The following Washington Department of Fish and Wildlife Priority Habitats and Species could occur in the Project vicinity.

- Coho Salmon (Oncorhynchus kisutch)
- Winter Steelhead (Oncorhynchus mykiss)
- Fall Chum (Oncorhynchus keta)
- Fall Chinook (Oncorhynchus tshawytscha)
- Marbled Murrelet (Brachyramphus marmoratus)
- Shorebird concentrations
- Waterfowl concentrations
- Wetlands
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Purple martin (Progne subis)

See the attached JARPA and Biological Evaluation for additional information.

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

Yes. Salmonids could use the Project vicinity during their migrations. In-water work will comply with the in-water work window for the area to avoid key migration times.

Baker Bay and the lower Columbia River are situated within the Pacific Flyway which supports a variety of migratory birds. The Pacific Flyway includes the entire west coast of North America reaching from northern Alaska and Canada to the southern tip of Mexico.

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

Avoidance and minimization measures (AMMs) and BMPs will be implemented during construction to avoid and/or minimize impacts to wildlife. See the attached JARPA and Biological Evaluation for a full list of measures to preserve or enhance wildlife. Key AMMs/BMPs include:

 In-water construction activities will comply with the in-water construction window (anticipated to be November 1 through February 28)

- During any in-water and embankment work, containment booms will be used to surround the work areas or separate embankment work from surface water.
- Steel piling will be installed with a vibratory hammer when possible. Impact hammering
 will start with light tapping, then increase to full force gradually.
- A bubble curtain and one or more other noise attenuation methods will be used during impact installation or proofing of all steel piling.
- e. List any invasive animal species known to be on or near the site.

There are no known invasive animal species that occur at or near the site.

- 6. Energy and Natural Resources [help]
- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The Project does not propose structures that will use energy into the future, however energy (fuel) will be consumed during demolition to operate equipment.

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

No. The Project would not affect potential use of solar energy.

c. What kinds of energy conservation features are included in the plans of this proposal?

List other proposed measures to reduce or control energy impacts, if any:

Not applicable. Energy use is anticipated to be minimal and short-term. Energy conservation measures are not proposed.

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

A portion of the creosote-treated timber bulkhead, all of the creosote treated timber revetment and associated structures, and other creosote-treated structures (to be removed from the adjacent slip for mitigation) will be removed. While creosote-treated piles are being removed, a containment boom will surround the work area to contain and collect any floating debris and sheen. Debris will be retrieved and disposed of properly. See the full list of AMMs/BMPs in the attached JARPA and Biological Evaluation that would be implemented during creosote structure removal.

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

Creosote-treated timber structures are present at the site.

 Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity. Creosote-treated timber exists within the Project area. No other hazardous chemicals or conditions are known to occur.

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

The Project proposes to remove creosote treated wood from the marine environment. Please see the attached JARPA and Biological Evaluation for a discussion on the minimization measures proposed for creosote treated wood removal.

- 4) Describe special emergency services that might be required. Special emergency services are not anticipated to be required.
- 5) Proposed measures to reduce or control environmental health hazards, if any: Measures will be implemented to reduce the risk of creosote exposure during creosote-treated wood removal. Please see the attached JARPA and Biological Evaluation for a discussion on the minimization measures proposed for creosote treated wood removal.

b. Noise

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

In-water construction noise sources include pile driving and the use of barge and boats. Above water construction include the use of a powered hand tools, barge, and tugboat. Please see Section 2.3 of the attached Biological Evaluation for additional information.

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)? Indi-cate what hours noise would come from the site.

Project noise will be short-term and limited to daylight hours. In-air pile driving noise could reach up to 105 A-weighted decibels (dBA). In-water pile driving noise could reach up to 170 dB root mean square (rms).

The marina is a seasonally busy commercial fishing and recreation marina. The project will not change the use of the marina and no longterm changes to noise are anticipated.

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

The proposed project will comply with City of Ilwaco noise ordnance 8.18.050.1 limiting construction work between 7AM and 630PM Monday through Saturday and between 9AM and 5PM on Sundays.

The following measures would be implemented to reduce potential noise impacts:

- Steel piling will be installed with a vibratory hammer when possible. Impact hammering
 will start with light tapping, then increase to full force gradually.
- A bubble curtain and one or more other noise attenuation methods will be used during impact installation or proofing of all steel piling.
- Pile-driving will commence with a soft start procedure (ramping up) in order to alert nearby
 wildlife, allowing them to move out of the area prior to construction activities. For impact
 pile driving, contractors will be required to provide an initial set of strikes from the hammer
 at reduced percent energy, each strike followed by no less than a 30-second waiting

period. This procedure will be conducted a total of two times before impact pile driving begins.

 Use of a wood cushion block or other sound-reducing method shall be implemented if impact pile driving is to be employed. The use of wood cushion blocks during construction will result in a reduction in underwater noise.

8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

The Project vicinity generally consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard. The Project site is located at a commercial fishing wharf. The Project will return use of the wharf for temporary mooring for offloading and loading of equipment and product for the Safe Coast Seafoods facility. The completed Project will also return access to the adjacent driveway. The adjacent driveway access is currently strictly controlled and limited due to load limitations resulting from the poor condition of the existing bulkhead.

b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

No. The Project site has not been used as working farmlands or working forest lands.

1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

Not applicable. The Project is not located near a farm or forest.

c. Describe any structures on the site.

The Project vicinity generally consists of a marina used for year-round moorage of recreational and commercial fishing vessels, upland commercial buildings, and a boatyard. The Project site is located at a commercial fishing wharf (herein referred to as 'wharf'). The wharf is an earth filled structure on the east side and pile supported on the west side. The wharf is protected by a timber bulkhead (to be replaced) along the eastern limits of the wharf. The Port of Ilwaco Marina is located waterward of the existing bulkhead. To the north of the bulkhead wall, the shoreline is protected by a low creosote-treated timber retaining wall and large log. To the south of the bulkhead wall, shoreline protection consists of riprap and concrete rubble. The Safe Coast Seafoods buildings are located on the wharf.

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

The following structures will be removed:

- Portions of existing creosote-treated timber bulkhead
- The creosote-treated timber retaining wall and associated treated timber debris
- Derelict creosote-treated piles and cross-members located in the slip next to the bulkhead

- Concrete rubble to the south of the bulkhead will be removed and replaced with riprap to accommodate construction of the bulkhead
- A floating timber structure will be removed from the south portion of the marina as part of project mitigation.
- e. What is the current zoning classification of the site?

The Project is located within an area zoned as light industrial and adjacent to areas zoned as low density commercial (City of Ilwaco 2022).

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

The Project is located within an area zoned as light industrial and adjacent to areas zoned as low density commercial (City of Ilwaco 2022).

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

The upland areas are designated as 'high intensity'. Areas waterward of the ordinary highwater mark (OHWM) are designated as 'aquatic'.

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

The Project occurs in an area that is designated as a Fish and Wildlife Conservation area.

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

Zero. People will not work or reside in the completed Project.

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

Zero. People would not be displaced by the Project.

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

None. No displacement impacts would occur.

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

No measures are proposed. The Project would be compatible with existing land uses without additional measures.

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

No measures are proposed. The Project would not impact agricultural or forest lands.

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

Zero.

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

Zero.

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

No measures are proposed. The Project would not result in housing impacts.

10. Aesthetics [help]

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

The replacement bulkhead will be raised approximately 3 feet to accommodate sea level rise. The total height above HTL is 4.3 feet. The top of slope along the head of the adjacent slip will be raised approximately 1.5 feet to +14 feet MLLW.

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

Views are not anticipated to be impacted. As stated above, the top of the replaced bulkhead wall will be at elevation 14 ft MLLW, 4.3 feet above the HTL. The increase to the top of slope at the head of the slip to 14 feet MLLW is not anticipated to impact any views as the adjacent properties are used by commercial businesses and the increase of approximately 1.5 feet is not anticipated to adversely after views from the businesses.

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

No measures are proposed. The Project is not anticipated to result in adverse impacts to aesthetics. The Project could provide aesthetic benefits by removing derelict structures.

11. Light and Glare [help]

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

Construction will occur during the daylight hours. Changes to longterm wharf lighting is not proposed.

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

No. Lighting is not proposed.

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 may affect the Project.

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

No measures are proposed. The Project is not anticipated to result in light or glare impacts.

12. Recreation [help]

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

The Port of Ilwaco marina is used for recreational activities such as boating, in addition to commercial uses.

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

The Project could temporarily disturb use of the adjacent Port of Ilwaco Marina during construction. However, impacts are anticipated to be minor, localized to the immediate area around the proposed activities, and the Project would not restrict use of the marina. Additionally, work will be completed Fall and Winter of the 2024/ 2025 season (work window for in-water work is limited to November 1 through February 28) which will avoid disruptions during the busy summer fishing season.

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

Substantial impacts to recreation are not anticipated and therefore no measures are proposed to reduce impacts. The bulkhead replacement would prevent the shoreline from falling into a portion of the active Port of Ilwaco Marina, which would impact operations and recreation at the marina.

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

In 1968, the filling in of the former tidelands made the former Pioneer Packing Company cannery platform into a peninsula at the northwest corner of the mooring basin (USC&GS 1968;USGS 1969). The former Pioneer Packing Company cannery became Jessie's Ilwaco Fish Company in 1961, and the property is now home to Safe Coast Seafoods.

A cultural resources and historic and built environment assessment was completed for the Project and it was determined that there are no known archaeological resources within the Project area (WillametteCRA 2022) and that the adjacent seafood buildings should not be eligible for listing in the National Registry for Historic Places based on a lack of integrity of design, materials and workmanship (processing building)and/or age of the building (south building) (Willamette CRA 2023).

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.
 - No. A cultural resource and historic and built environment assessment was completed for the Project (WillametteCRA 2022 and 2023).
- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

The following resources were reviewed by WillametteCRA as part of the cultural resource and historic built environment assessment completed for the Project (WillametteCRA 2022 and 2023 [Technical Addendum]):

- Documents on file with the Washington Department of Archaeology and Historic Preservation (DAHP) and the Oregon State Historic Preservation Office (SHPO) to determine if archaeological resources have been recorded in the Project vicinity, and to identify any previous archaeological studies in the area
- Copies of historical maps and records to assess the potential for historic-period archaeological resources in the Project vicinity
- Historic photographs and newspaper articles related to the Port at the Columbia Pacific Heritage Museum in Ilwaco
- A reconnaissance-level assessment of the current study area and archival research on 27 April 2022

- An aboveground resource survey, formally documenting the East Bulkhead on 10 June 2022
- A Historic Property Inventory (HPI) form
- Site survey of upland buildings completed 12 April 2023
- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

Impacts to historic and cultural resources are not anticipated. If archaeological materials or human remains be observed during Project activities, all work in the immediate vicinity shall stop and DAHP, the County planning office, and the affected Tribe(s) would be contacted.

14. Transportation [help]

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

The Project will mainly be completed from the water. Trucks may occasionally be used to transport materials,

b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

The geographic area is currently served by public transit. The nearest bus stop is approximately 0.1 miles from the Project site.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

Zero. The Project does not propose to eliminate or construct parking spaces.

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

Improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways are not proposed. The existing private driveway will be regraded and repaved with structural fill base course and asphalt pavement. Upland paving and grading will then be completed behind the bulkhead wall to repair damage associated with bulkhead movement and driveway settlement and to mitigate sea level rise.

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

The maintenance and repair project will be completed on the east side of the Safe Coast Seafoods wharf adjacent to an Ilwaco Marina slip. The seafood facility is a busy seafood processing facility that processes fish products delivered by vessel and trucks. The marina is a seasonally busy small marina serving commercial fishing and recreation vehicles.

Maintenance and rehabilitation of the existing infrastructure will reestablish operational efficiency and will allow accommodation of the intended vessel and vehicle traffic for which bulkhead and adjacent drive were originally approved and operated. The project does not expand the operational footprint of the of the wharf or the marina nor result in

an increase in vessel or vehicular traffic relative to previous operations.

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The Project will mainly be completed from the water. There may be occasional vehicular trips associated with construction activities, however these have not been quantified.

The vehicular and vessel traffic to and from the site after project completion will remain the same as existing conditions.

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

No. The Project will not impact the movement of agricultural and forest products on roads or streets. Transportation impacts have not been identified.

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

No measures are proposed. Transportation impacts have not been identified.

- 15. Public Services [help]
- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

No. The Project does not propose the construction of new structures that could require an increased need for public services.

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

No measures are proposed. Public service impacts have not been identified.

16.	Utilities	[help]
10.	commes	HIEIDI

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

Utilities do not service the structures that would be affected by this Project.

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

No utilities are proposed.

C. Signature [HELP]

The above answers are true and	complete to the l	best of my knowle	edge. I understand that the
lead agency is relyipg on them to	make its ģ ecisio	on.	

Signature:	Trace	1.62		
Name of signee _	Tracy	Lotstrom	· · · · · · · · · · · · · · · · · · ·	<u> </u>
Position and Age	ncy/Organization	Minager	· Hort of	Ilunio
Date Submitted:	6/30/23	Q		

D. Supplemental sheet for nonproject actions [HELP]

(IT IS NOT NECESSARY to use this sheet for project actions)

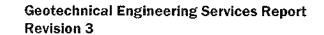
Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of

at	ctivities likely to result from the proposal, would affect the item at a greater intensity or a faster rate than if the proposal were not implemented. Respond briefly and in general rms.
1.	How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?
	Proposed measures to avoid or reduce such increases are:
2.	How would the proposal be likely to affect plants, animals, fish, or marine life?
	Proposed measures to protect or conserve plants, animals, fish, or marine life are:
3.	How would the proposal be likely to deplete energy or natural resources?
	Proposed measures to protect or conserve energy and natural resources are:
4.	How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Proposed measures to protect such resources or to avoid or reduce impacts are:

5.	How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?
	Proposed measures to avoid or reduce shoreline and land use impacts are:
6.	How would the proposal be likely to increase demands on transportation or public services and utilities?
	Proposed measures to reduce or respond to such demand(s) are:
7.	Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.



Port of Ilwaco, Marina Structures Replacement and Dredging, Engineering, and Permitting 1170 Howerton Avenue East Ilwaco, Washington

for Moffatt & Nichol Engineers

October 4, 2023



Geotechnical Engineering Services Report Revision 3

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October 4, 2023



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