

ENVIRONMENTAL CHECKLIST

Purpose of checklist:

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

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

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

Use of checklist for nonproject proposals:

Complete this checklist for nonproject proposals, even though questions may be answered "does not apply." In addition, complete the supplemental sheet for nonproject actions (Part D).

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

A. Background

1. Name of proposed project, if applicable:

Smith Island Terminal

2. Name of applicant:

Smith Island Terminal, LLC.

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

Applicant:

Smith Island Terminal, LLC
John Brigham

7343 East Marginal Way South
Seattle, WA 98108
Phone: 206-832-3000
Fax: 206-832-3030

Representative:

Mark Wolken Consulting
Mark Wolken
2903B Hewitt Avenue
Everett, WA 98201
Phone: 425-252-0320

4. Date checklist prepared:

November 6, 2014

5. Agency requesting checklist:

Washington Department of Ecology for CZM/City of Everett

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

Once the necessary permits and authorizations are in hand, sequencing of the mitigation activities for this phase will occur as follows:

- Preparation of Stormwater Pollution Prevention Plan
- Mobilization to the mitigation sites.
- Deployment of silt fencing and other erosion and sedimentation control BMPs.

Initial construction will entail excavation to construct mitigation area 3. The soil removed from that area will be used in the construction of dike sections necessary for the construction of tidal marsh wetland Mitigation Area 4. Additional fill will be used as necessary to finish that dike area. Portions of the construction of Mitigation area 4 will occur concurrently with the dike construction. This work will entail shaping of the surface as necessary to achieve optimum grades for post-dike-breach functions and excavation of distributary channels within the area to be returned to tidal function. The ditch (D 1) that will be incorporated into

Mitigation area 4 west of the new north-south pedestrian bridge will be re-shaped to widen the deeper channel and remove some existing vegetation to allow for better flows after re-connection to Union Slough. Once the dikes are in place and the internal areas of Mitigation Area removal of the levee impeding tide cycling from the created inter-tidal cell at Mitigation Area 4 will occur. Clean up and demobilization from the mitigation sites will follow the levee removal. Maturation is expected to occur naturally in the inter-tidal mitigation areas after low-flow channels and ultimate elevations are established.

Work for this element will be conducted using excavators, trucks, wheel loaders, roller compactor, dozers, possibly graders, a water truck or other equipment for dust control and street sweeper to prevent track-out to public streets.

After the initial phase of construction associated with Mitigation Area 4, or concurrent with it, construction of Mitigation area 2 will occur. This work will entail construction of the edge of fill for the rail yard along its southwest curve from the edge of the Cedar Grove facility at the edge of development towards and to the fill stockpile at the southwest corner of the Concrete NorWest/Sumner Capital property. Work to construct Mitigation area 2 will entail select removal of soil to widen and shape areas to be converted to tidal wetland, installation of a self-regulating tide-gate and planting as needed. Clean up and demobilization from the mitigation sites will follow the levee removal. Maturation is expected to occur naturally in the inter-tidal mitigation areas after low-flow channels and ultimate elevations are established.

Work for this element will be conducted using excavators, trucks, wheel loaders, roller compactor, dozers, possibly graders, a water truck or other equipment for dust control and street sweeper to prevent track-out to public streets.

Concurrent with construction of the mitigation areas as described above, fill and surcharge of the development area for the rail terminal, relocated access road, a new parking area for the public access trail, a new link for the trail from the parking north to the existing trail (on the landward side of the tree berms adjacent to Mitigation Area 4) will commence. Fill in areas between the BNSF mainline and Concrete NorWest/Sumner Capital parcels will be placed first to prepare it for use during the construction of the railroad bridge/undercrossing. Temporary access roads and dumping areas will be constructed into the Terminal footprint for delivery of fill. Fill will be placed in lifts by spreading and roller compacting.

The railroad bridge/undercrossing on the mainline will be constructed in conjunction with BNSF. Construction of the grade separation to access the relocated road will entail removal of about 30-40 feet of the mainline track and embankment, installation of a ballast cast-bridge in the mainline to bridge that space, construction of a road ramping down and under the new railroad bridge connecting the Frontage Road with the new access road and closing of the existing railroad crossing at 36th Place NE. A pump system to remove stormwater and any groundwater seepage into the road areas associated with the access will be installed with the collected water pumped to the Terminal's stormwater collection and treatment system. A temporary "shoo-fly" track will be constructed parallel to the BNSF mainline north and south of the grade separation to allow trains to pass by while the work on the grade separation is

done within the mainline track. This track work will require fill to bring the track to the same grade as the mainline. In the area south of the SIT properties, a wall will be installed to anchor the fill without encroaching on the adjacent property. When the "shoo-fly" is no longer needed the track, fill and wall will be removed and the area restored.

After fill elevations and targeted soil compaction have been achieved a mainline switch will be constructed by BNSF for the southern access and SIT will construct the track loops (possibly in 2 phases). The track bed will be laid (rock ballast, ties and rail) the terminal yard will be covered with clean crushed aggregate the office and maintenance area, equipment storage paved pad and permanent stormwater treatment for the disturbed areas (settlement pond and treatment system) will be constructed. The new access road for Cedar Grove and the access road into the Terminal and Concrete NorWest will be paved. Existing utilities serving Cedar Grove (water and electricity) may be relocated as part of the project through the Terminal property.

Fill and construction of Terminal area will be conducted using excavators, trucks, roller compactor, dozers, possibly graders, a water truck or other equipment for dust control and street sweeper to prevent track-out to public streets. Track work will include specialized equipment to install rails, track and ballast.

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

SIT does not have additional plans. The property owners south of SIT on the west side of Smith Island may choose to connect their access to the grade separation. SIT has no control over how they would choose to make that connection.

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

SEPA Expanded Checklist for Cedar Grove Composting for ready-mix batch plant, July 2005.

SEPA Expanded Checklist for Cedar Grove Composting, July 2003.

SPU and Shoreline Permit Application for Cedar Grove Composting, July 2003.

MDNS # SEPA #03-039

SEPA, SMU and SPU addendum June 25, 2007

Revised Air Permit Puget Sound Clean Air Agency, 2008

JARPA for SIT application made to US Army Corps of Engineers February 2014

Cultural Resource Assessment for the Cedar Grove Composting Expansion Project,

Snohomish County, Washington Northwest Archaeological Associates, September 25, 2009

Wetland and Ordinary High Water Delineation Smith Island Site, Everett, WA March 2008

Conceptual Wetland Mitigation Plan Smith Island Terminal, February 7, 2014

Biological Evaluation Smith Island Terminal, February 11, 2014

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.

Yes. Individual Permit under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act, 401 Water Quality Certification and Coastal Zone Management Consistency determination. During the pendency of this application an application will be filed with the Surface Transportation Board for an Authorization to construct railroad line (or exemption from authorization).

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

City of Everett:

- Shoreline Master Plan
- Wetland Fill
- Buffer modification
- Landscape modification
- Flood Certification
- Building Permits
- Grading Permit

United States Army Corps of Engineers

- Individual Permit under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act
- Effects consultation under Endangered Species Act (concluded)

Surface Transportation Board

- Authorization to construct railroad line (or exemption from authorization) 49 U.S.C. §10901

Washington Department of Ecology

- Water Quality Certification (401)
- CZM Certification of Consistency
- Construction Stormwater Permit
- NPDES for permanent stormwater system

Washington Department of Fish and Wildlife

- Hydraulics Permit

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.)

Basic Project: The purpose is to provide a freight intermodal facility to serve the Everett-Snohomish County area. The project proponent is Smith Island Terminals, LLC which is comprised of the underlying property owners (Cedar Grove, Concrete NorWest, Northwest Construction and Brad Rengen). The Project consists of the construction of two connecting rail lines of approximately 400 feet each to reach the nearby mainline of BNSF (north of Delta Jct.), along with the construction of approximately 8,400 feet of loop track (two full loops) and ancillary storage tracks and loading areas, office and maintenance building, a paved equipment storage area, stormwater collection and treatment facilities, construction of an undercrossing of the BNSF mainline to provide grade separated access for the Terminal and other properties on Smith Island, a new access road outside of the track to access Cedar Grove Composting and its Public Access trail, wetland mitigation including some reconfiguration and minor changes to the trail to accommodate bridging for dike breach and tidal connection, and buffer enhancement and re-located public access parking in the City of Everett, Washington.

NOTE: This is not a facility that would or could handle oil, coal, or LNG. As described below it also has only an incidental (customer) relationship with the adjacent compost facility and only entails handling finished product.

Smith Island Terminal will be established and operated as a Class III railroad. It will require authorization from the Surface Transportation Board (STB) to construct and rail operations within the facility will be subject to regulation by the Federal Railroad Administration (FRA) like any other railroad.

The overall Project purpose is to provide a facility to allow affordable and reliable shipment of finished compost (in bulk), receive logs from the Rocky Mountain region for handling through the Port of Everett, and other commodities for businesses in the Everett and Snohomish County area.

Finished Compost: Two market areas in particular have the potential to create a stable sales flow for compost generated at the Cedar Grove Compost Everett facility. Prior to the spike in diesel prices in the early 2000's (that has essentially become the new market reality) there was high demand for compost in wineries and other agricultural activities east of the Cascades. Bulk rail transport (2,500-5,000 tons per shipment) is the best method to gain access to those distant markets. Another market that exists that has had the same economic barrier is compost used as to stimulate growth of desired plants and provide other benefits in mine reclamation and/or environmental remediation projects in the Rocky Mountain region. Again, while it is not economically feasible to truck compost to these areas, it is feasible to ship bulk loads to these areas by rail. Shipment of 100,000 tons per year of compost is the projected volume for this need.

Logs: Under today's timber economy logs could move from the Rocky Mountain Region to Everett and that material could be strategically forwarded to various markets. The difference in price for raw logs at mills in some regions is dramatically lower than export prices providing an opportunity for timber (primarily harvested from private forest lands). Regular shipment of logs between regions would also increase the opportunities for local mills to access more timber for their needs. The log handling facility on Smith Island in Everett has projected that it could transport the equivalent of 400,000 tons of logs per for processing through its facility.

Port of Everett: The Port anticipates growth supporting the energy industries in Alberta, Canada, The Bakken and Alaska, cement imports as well as increases in machinery and auto imports and exports. Despite investment in on-dock rail capacity the Port expects demand to exceed it in the next couple years. The Port would use SIT to provide needed rail shipping, especially for autos and construction materials (i.e. pipe, steel, etc). Based on auto capacity of ships calling Everett of average of 650 this consumes 6.5 acres per ship and requires 4,000 feet of rail capacity.

Other shippers in Snohomish County area: There is demand for other freight rail transportation services in the Everett-Snohomish County area so the project will also be available for third party use to meet the incoming and outgoing rail service demands of local and regional businesses and shippers with the facility operating as a common carrier to serve shippers who may wish to transport freight over its lines. The Washington State Rail Plan found that private investment in improvements to the rail infrastructure is a critical need that will benefit the economy and improve the environment by reducing reliance on trucking (which has greater air emissions than rail). BNSF has indicated there is a demand for rail trans-loading services in this area that can be addressed through the project.

The grade separation component is needed to provide a safer access for existing businesses on Smith Island as well as for the Terminal. Rail traffic on the BNSF mainline results in numerous long blockages of the at-grade crossing resulting in serious business impacts and forcing vehicle idling. The present ramps to and from SR 529 in the vicinity are substandard but the present access points to properties west of the BNSF limit the practicable alternatives for addressing those issues-the grade separation opens up opportunities for straight-forward changes. The location of the grade-separation allows for the properties on southwest Smith Island to potentially connect and use this crossing which would increase the benefits of its location.

Rail movements associated with the facility will be primarily moved on existing BNSF regular train service so it does not entail new trains per se, just more cars on some existing movements. Cars will be switched in-and-out between the Delta Yard and the site (roughly 0.9 mile).

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.

36th Place Northeast, Everett, WA 98205

Snohomish County Assessor's Tax Parcel numbers: 29050500100200/300/400/600, 29050500101200, 29050500200300, 29050500300300, 29050500400200/500, 29050500401300

Legal Description: Section 5, Township 29 N, Range 5 E

Assessor's Map attached in Attachment D.

TO BE COMPLETED BY APPLICANT.

B. ENVIRONMENTAL ELEMENTS

1. Earth

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

Flat

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

>2% (other than dike edges)

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland.

Soils data excerpted from the Soil Survey of Snohomish County Area, Washington (USDA, 1983) identify three soil units mapped within the project area. The largest soil unit mapped within the project area is Puget silty clay loam (Map Unit 55), a mesic Typic Fluvaquent. This soil is listed as hydric in the Hydric Soils of the State of Washington (USDA, 1991). This soil is described as a very deep soil, artificially drained soil formed in alluvium found on depressional areas in flood plains from sea level to 650 feet. Slopes are generally 0 to 2 percent. The top layer is dark grayish-brown silty clay loam about 9 inches thick. Beneath the surface layer is an olive gray or gray silty clay loam about 60 inches thick or more. A

seasonal water table is at a depth of 24 to 48 inches. Permeability is low and available water capacity is high with 60 inches or more of effective rooting depth.

Other soil units mapped adjacent to the project area are classified as urban land (Map Unit 78) and Xerorthents, level (Map Unit 82). Urban land units are areas that have been developed and covered by streets, buildings, parking lots and other structures that obscure or alter the soils.

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

No. Initial diking and filling of the site began before 1900. Additional filling may have occurred before 1950 and again in the late 1960s. The soils appear to be very tightly compacted with no evidence of instability. A geotechnical report for ensuring the long-term soundness of the track, loading areas and any other structures will be developed concurrent with final designs.

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

The fill will be clean construction fill. The dike area for the tidal cell in the northeast corner will be mostly or all from material excavated for that cell. Fill volume is about 678,000 cubic yards. About 30% of the fill is already stored on the site with the remainder imported from construction sites.

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

Erosion during filling is unlikely. In 2009, planting berms were installed around most of the site. Consequently, nearly all of the areas to be filled are enveloped such that an erosion control system is already in place. The few small gaps in the berms will be filled at the beginning of construction to complete the system. There is some potential for erosion during dike breaching and other mitigation work that is addressed in the wetland mitigation plan.

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

About 6 percent of the property will be impervious surface at completion.

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

During Construction and Filling: A stormwater pollution prevention plan (SWPP) will be developed prior to commencement of any construction activities.

Mitigation Areas: The only erosion risk will occur during and after dike breaching and other work for the mitigation areas. Establishing a baseline for monitoring will be a challenge due

to the presence of extensive mudflats adjacent to Mitigation Area 4 that are a source of suspended sediments during tidal movements. SIT will consult with agencies in the development of the SWPP to identify the most meaningful approach to ensuring there is no impact from the dike breach itself.

The approach to the tidal litigation areas follows advice provided to Cedar Grove by Tulalip Tribes Natural Resource staff in discussions over a prior proposal to follow a passive approach to recolonization of wetland plants that minimizes and avoids excavation. In June 2014 the area on both sides of the dike was surveyed to compare the elevation of the sedge colonies on the outward side with the elevations of ground inside the dike. The sedge elevations were from elevation 2.7-9' and the elevations inward of the dike are about 5'-in the middle of the optimum growth elevation in this area. Consequently, the approach will be to leave the reed canary grass to die back and allow for the sedges to naturally replace it after reintroduction of the brackish waters. This slower approach should dramatically lessen the potential for erosion.

The SWPP will outline specific measures that may include use of barriers such as silt fencing and possibly bubble curtains.

2. Air

a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.

During Construction:

There is a potential for dust to be generated during construction.

There will be some emissions from construction equipment used during fill and construction of the track.

During operation:

There will be emissions from railroad switch engines bring cars to and taking cars from the site. There will be emissions from equipment used to load bulk items on and off rail cars and trucks and moving rail cars around the site. There will be emissions from trucks delivering freight to and from the facility. There is a minor potential to generate some dust in the overhead loading of finished compost into rail cars. There is a potential for dust to be generated from trucks and equipment operating over unpaved areas.

There are no planned activities in the rail facility that would generate odors.

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

No, there are no sources of emissions or odors that would affect the proposal.

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

Construction and Fill: Best Management Practices (BMPs) will be employed to control dust emissions. Best Management Practices (BMPs) may include such measures as applying water to moisten material as necessary to abate dust and if necessary a commercial dust control product or sprayer/misters may be used.

Operations: Rail loading and operating equipment will use appropriate emission control technology. The grade separation for access will substantially reduce emissions by eliminating wait times for passing trains and associated idling. Shipment of material by rail reduces the emissions associated with transportation compared to truck haul by 90% or more.

Initial operations may use aggregate instead of paving. Once automobile shipments begin internal driving surfaces and parking areas for the autos will be paved. Best Management Practices (BMPs) will be employed to control dust emissions prior to paving. BMPs may include such measures as applying water to moisten material as necessary to abate dust. It is possible that once auto shipping commences misting systems will be used around the perimeter to control dust generated on-site and off-site.

3. Water

a. Surface:

1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Please refer to the attached Revised Critical Areas Delineation and Mitigation Plan Final Report.

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.

Please refer to the attached Revised Critical Areas Delineation and Mitigation Plan Final Report.

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

The Palustrine wetlands would be filled with clean dirt for development areas. The total development would require about 680,000 cubic yards of fill and construction base for the

rail terminal area. The mitigation area will be excavated from a combination of upland and wetland areas. This excavation would remove about 35,000 cubic yards of fill, which would be used for dikes around that cell and as part of the project fill total.

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

There will be no diversion or withdrawals of surface waters on the site.

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

Yes. The project area that is subject of this review is within the 100-year flood plain. The project will raise the developed area to an elevation at least 4 feet above that level. The fill has no effect on the flood holding capacity of the Snohomish River. A letter certifying "No Rise" in the 100-year flood plain from West Consultants dated October 3, 2008 is attached to this Checklist.

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

No. Only treated stormwater will be discharged to surface waters.

b. Ground:

1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

No water will be withdrawn from or discharged to the groundwater.

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

No water will be withdrawn from or discharged to the groundwater.

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.

In accordance with the National Pollution Discharge Elimination System (NPDES), a Construction Stormwater Permit will be required for the project. SIT will install a temporary construction stormwater management system in accordance with that permit. SIT will

develop a SWPPP that details how they will manage stormwater at the site during construction of the SIT and prevent water quality issues. The SWPPP will identify Best Management Practices (BMPs) and Temporary Erosion and Sediment Control (TESC) measures will be utilized during the project to avoid impacts to ESA-listed species and critical habitat.

Other impact avoidance and minimization measures include but are not limited to:

- ✓ Daily inspections of the erosion control measures will be conducted throughout the construction period. This will ensure the effectiveness of the measures and determine the need for maintenance, repairs, or additional measures.
- ✓ Work below the OHWM will be conducted during the approved work windows for fish species that may occur in the project area.
- ✓ Disturbance will be limited to those areas necessary for construction, which will be identified on approved site plans and marked in the field before construction begins.
- ✓ Work will be in compliance with local, state and federal regulations and restrictions.
- ✓ The project will obtain and comply with the conditions and provisions of the permits issued by the regulatory agencies. It is anticipated that stormwater will be contained within the project area during construction and will not be allowed to enter surface water bodies unless in compliance with state water quality standards (WAC 173-201A). As such, construction stormwater is not expected to effect the environment beyond the immediate project site.

SIT will manage water quality impacts through proper implementation of BMPs and significant increases in turbidity, detectable beyond the allowable mixing zone, are not expected. With the implementation of construction BMPs, the potential for discharge of sediments into Union Slough is very low and considered inconsequential.

The proposed Smith Island Terminal will convert a largely vegetated area to gravel or impervious surfaces for industrial use. Impervious surfaces are pollution-generating because they collect and convey oils, sediment and other pollutants from vehicles and trains. In accordance with current City of Everett drainage requirements for new and redeveloped sites, Project Engineers will develop a Stormwater Site Plan to meet applicable minimum requirements including enhanced water quality treatment standards. In addition to meeting the City of Everett enhanced water quality treatment requirements, discharge will comply with the Washington Department of Ecology 2012 Stormwater Management Manual for Western Washington (SWMMWW) and current Department of Ecology Industrial Stormwater General Permit benchmarks and sampling for the proposed industrial use.

The SIT will be developed in phases and the stormwater facilities will be constructed in order to accommodate each phase of construction. Stormwater will be collected and conveyed to the new on-site treatment facility by means of conventional piped systems. The proposed stormwater facility will be located in the northwest corner of the proposed railway loop. A chitosan enhanced sand filtration or electrocoagulation treatment system is recommended by the project civil engineer. The existing Concrete Northwest linear wetpond treatment system will be abandoned. Drainage from the yard and stockpile areas will be collected into the

newly constructed conveyance system and routed to the terminal mechanical treatment facility. Drainage from a minor portion of the proposed access road will be pumped up to the pipe conveyance system. The stormwater from the concrete batch plant will continue to be hydraulically isolated from the SIT drainage plan and will be maintained independently. Stormwater from that portion of the newly aligned Cedar Grove access road will be treated by means of a filter media strip along the roadway. This treated runoff will be collected in a parallel swale and discharged into the previously mentioned existing channel along the southern property boundary. At this stage of design, no stormwater detention will be provided due to allowable direct discharge of treated stormwater into Steamboat Slough. An open stormwater storage facility (pond) will be constructed within the loop track area to provide sedimentation and large storm storage capacity prior to water quality treatment. Following sedimentation, a pump will be utilized to pump stormwater through an adequately sized chitosan enhanced sand filtration or electrocoagulation treatment system. Gravity and/or pump conveyance systems will be constructed in a phased manner as industrial development progresses to convey drainage into the northwest corner of the site. Treated stormwater will be used to enhance the hydrology of the wetlands and associated buffer area along the northern perimeter of the adjacent Cedar Grove Composting plant and the buffers for the rail terminal. In addition a discharge point to Union Slough will be developed. It is possible that future activities and associated development could necessitate use of an underground detention vault rather than open storage.

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

No. While the yard area will initially be entirely paved it will have several feet of compacted soil overlain by a rock surface. The working surface will be graded to collect stormwater and direct it to the treatment system. Stormwater treatment will remove waste materials.

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

The stormwater system collects and treats stormwater.

4. Plants

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

deciduous tree: Alders in the south central area of the project, Pacific crabapple (*Malus fusca*) along the dike section proposed to be removed for the tidal cell.

evergreen tree: None

shrubs: Scots broom, Himalayan blackberry, and tall Oregon grape and red elderberry (along dike section to be removed)

grass Reed Canary Grass

pasture

crop or grain

wet soil plants:

water plants: water lily, eelgrass, milfoil, other See Wetland data forms in report

(Attachment G) for full listing

 X other types of vegetation (See Wetland report for full description – Attachment G)

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

Reed Canary grass and the invasive shrubs will be covered with fill, and/or killed by the reintroduction of brackish water within the mitigation areas. A portion of the tree berm planted in 2009 will be removed.

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

There are no threatened or endangered plants found at the project site.

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

Planting will be done as part of development of the mitigation areas and buffers with some additional landscaping in areas that do not interfere with railroad movements. This includes:

Northern and Northeastern edge:

A berm was installed in winter 2009. The top and northern edge, as well as about 150 feet of the northeast corner of that berm that turns south will remain. The planting contains dozens of mature (12-30 feet) evergreens at the upper edge (mostly cedars and Douglas fir). The remainder of the top and upper edge is densely planted with a hedge of salt tolerant willows presently 15-30 ft. Native shrubs (twinberry, salmonberry, and roses) are planted on the outer slopes of the berm to what will be the high tide levels after tidal restoration steps are implemented. Plants from areas of the berm that will be removed for the rail yard will be salvaged and re-used in the buffer areas to the maximum extent possible. This will include transplant of large conifers and harvesting of stakes from willows for replanting in other areas.

The remainder of the northern edge includes the existing public trail. The inner and outer edges of the trail were planted beginning in 2005 and contain mature trees (shore pine, sitka spruce, pacific crabapple, etc.) +30' and shrubs.

Fill from the operating area will slope downward from the 16' elevation of the rail line to the 12' elevation at the edge of the tree berm where applicable and at an 8:1 slope to the existing @ 4-5' elevation in the tidal marsh areas of Mitigation area 4 in the northeast and north of the relocated public access parking. In the areas that will be adjacent to tidal waters the planting plan will essentially copy the 2009 planting berm described above (spaced evergreens along the top, dense overhanging vegetation including willows) and salt tolerant native shrubs on the sides descending down to the OHWM. In the areas that are not abutting the tidal marsh, a planting mix of native trees, shrubs and herbs similar to that planted in the Cedar Grove buffer will be installed.

Southern edge:

Buffer enhancement will occur along the southern perimeter of the adjacent Cedar Grove composting facility where mitigation is implemented for this project. The plantings in this area will be a combination of the planting described above. In select areas of the southeastern corner at the top of slopes and adjacent to roadways landscaping will be installed using native trees and shrubs.

5. Animals

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

Birds: (hawk), heron, (eagle), (songbirds), other: red-tailed hawk (*Buteo jamaicensis*), merlin (*Falco columbarius*), osprey (*Pandion haliaetus*), great blue heron (*Ardea herodias*)
Mammals: mice, moles, rabbits, River Otter (on outer dike off of the project boundary), coyote, deer (transient in buffer)
Fish: bass, salmon, trout, herring, shellfish, other: (See Revised Critical Areas Delineation and Mitigation Plan Final Report – Attachment I)

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

See attached Biological Evaluation. Bald Eagle, Bull trout, Chinook Salmon, Steelhead and Southern resident Killer Whale may all be present near the site.

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

The Snohomish River Delta is part of many migratory routes.

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

The wetland mitigation work will create new salt marsh habitat and create a more diverse freshwater habitat for wildlife (greater complexity and continuity). Buffers will be enhanced with more diverse and productive native vegetation (trees and shrubs in place of invasive blackberries and reed canary grass). Please refer Biological Evaluation, Mitigation Plan Final Report and Buffer Assessment for detail.

6. Energy and natural resources

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

Diesel will be used to fuel loading and rail switching equipment.

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

No. Due to the distances from adjacent properties as well as the relatively low profile of the operations there is no effect on the potential to use solar energy on adjacent properties.

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

Greenhouse gases emissions for rail transport (on a grams/per/ton/mile basis) has 2.5 to 8 times fewer emissions than does truck transport and on a ton per mile basis rail uses about a quarter of the fuel as trucks.

7. Environmental Health

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

No, no proposed uses would entail handling of any toxic chemicals or hazardous cargo. The facility has the same risk of equipment fuel spills as a truck freight depot.

1) Describe special emergency services that might be required.

No special emergency services would be required as a result of the proposal.

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

No special measures are needed.

b. Noise

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

Traffic on SR 529 and area roads, and equipment operations at the adjacent compost and ready-mix operations, Pacific Topsoil site, Miller Shingle and Everett Bark Supply.

2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

The operation of the proposed railway loop will result in increased levels of noise and vibration compared to baseline conditions. Source noise and vibrations currently exist in the vicinity of the proposed SIT. These sources include the existing BNSF mainline, SR 529, marine traffic in Steamboat and Union Sloughs, as well as vehicle and machinery associated

with the existing Cedar Grove and Concrete NorWest concrete batch plant. Parsons Brinkerhoff (2013) conducted a noise and vibration study for a similar railway expansion project and their sound modeling estimated noise levels within the subject rail yard to range between 45 and 58 dBA. Measured noise levels at the subject rail facility vary between 55 and 62 dBA (Parsons Brinkerhoff, 2013). Parson Brinkerhoff (2013) predicted that the subject railway expansion would result in an increase in noise levels of approximately 1-2 dBA above baseline noise levels. It is reasonable to assume that the proposed SIT will result in similar increases in noise of 1-2 dBA. Additionally, Parsons Brinkerhoff (2013) concluded that trains operating at low speeds (10 mph) are expected to generate vibration levels below 70 VdB (vibrations measured in velocity decibels) at 50 feet from the tracks. The impact with the greatest extent for this project is temporary construction noise disturbance. Potential noise impacts resulting from construction may exceed background levels and affect listed species and habitats up to approximately 900 feet (0.2 mile) over land and approximately 2,000 feet (0.4 miles) across open water located north of the site. Noise at the nearest residential receptor more than a mile away would be at or below existing background levels.

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

Trains entering and exiting the site will be at low speeds (area is a maximum speed of 10 mph). There will be little to no practical difference in grade between the tracks in the terminal and mainline so locomotives will not need to operate in high power settings. Equipment used on the site will use manufacturer's recommended mufflers and other standard noise attenuation devices. Based on the extreme distance to sensitive human receptors no other measures are needed. For wildlife, the noise level is not appreciably greater than current levels. As buffer vegetation matures it will increasingly soften the noise.

8. Land and Shoreline Use

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

North- Steamboat Slough and the closed Tulalip Landfill

South- Pacific Topsoil operation that handles woodwastes and soils.

East- Ready mix batch plant and BNSF Railroad mainline, and industrial property used for equipment maintenance and storage.

West- A portion of the old Weyerhaeuser wastewater ponds, and undeveloped land including saltmarsh (also Pacific Topsoils).

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

Yes, the area proposed for the rail terminal was used for agriculture from about 1864 until 2007. While it was used mostly for grazing the past 20 years, it was planted with barley in 2007.

c. Describe any structures on the site.

There is an existing ready-mix batch plant and associated buildings within the Terminal area.

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

No. No structures will be demolished.

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

M-2, Heavy Industry, with Urban Flood Fringe overlay

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

5.1, Heavy Industrial.

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

Mixed Use Industrial

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

The wetland areas that will be replaced are environmentally sensitive areas. Please see Wetland Report, Biological Evaluation and Mitigation Plan for detail.

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

Initial staffing would be 10-12 and growing to as many as 50+.

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

N/A

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

N/A

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

The activities in this proposal are consistent with the Comprehensive Plan and Zoning Code.

9. Housing

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

N/A

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

N/A

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

N/A

10. Aesthetics

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

A maintenance building for equipment up to 35 feet tall may be built. It would have a metal exterior.

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

No views in the area will be altered or obstructed.

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

The changes proposed will not change the aesthetics of the operation. Buffer planting will soften the appearance of the site.

11. Light and glare

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

The facility will be available for operation 24 hours per day. Lights will be used for security and to illuminate the active loading areas. These will be low intensity and focused downward.

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

There are numerous sources of light and glare that lie between this site and other areas. These include lights throughout the property and highway lights. The light on this site will be minimal, directed downward and should not impact any views.

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

Lights exist in the compost operating area of the property, on the property to the south, and along SR 529.

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

Any fixed lights will be directed downward and shielded as necessary to minimize their appearance from any off-site points.

12. Recreation

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

The site for this proposal includes a constructed public access trail, about 3,600 lineal feet long, and overlooks along the dikes, as well as parking for the trail users. During the initial development of the Cedar Grove Compost facility the trail was constructed along the entire length of the properties adjacent to the Slough (rather than only adjacent to the Compost operation). Consequently, the properties have provided more access (double) than would have been required for 10 years.

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

About 500 feet of the present trail will be removed with the dike as part of the tidal cell development and replaced with a similar length linking the new parking area with the existing trail.

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

The trail head and parking will be moved to an area adjacent to the access road

13. Historic and cultural preservation

a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.

No. An archaeological and historical evaluation (Cultural Resources Assessment for the Cedar Grove Composting Expansion Project, Snohomish County, Washington, Northwest Archaeological Associates, Inc. Seattle, Washington, September 25, 2009 on file with the City of Everett and USACE due to confidential information) concluded "No historic properties were identified during the survey or auguring. Although the area was used by both pre-contact and historic-era people, there is a low probability for archaeological material in the project area."

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

NWAA determined that there is a low potential for historic properties in the wetland mitigation areas. No historic properties were identified during pedestrian surface inspection of the project area, or subsurface auger probing. While Dr. Henry Smith's cabin once stood

in the vicinity of Mitigation Area 4, its probable location is currently covered with recently planted trees. Any traces of the cabin or outbuildings have since been removed during the parcel's use for agriculture. No additional archaeological investigations are recommended at this time.

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

It is always possible that undiscovered prehistoric or historic cultural material is present within the project area. In the event that any such resources are encountered during construction, all activity should cease in the vicinity. The Department of Archaeology and Historic Preservation (DAHP) in Olympia should be contacted, as well as appropriate tribal cultural resources representatives. If construction in any area encounters human remains, whether burials, isolated teeth, bones, or mortuary items, work in that area should stop immediately and the area surrounding the discovery secured. The Everett Police and Snohomish County Medical Examiner, the Tulalip Tribes, and DAHP should then be notified.

14. Transportation

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

The site is served by Frontage Road (34th Ave NE), Ross Avenue and SR 529. A new grade separated access will be developed at the southeast corner of the site to allow access through the BNSF ROW.

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

Smith Island does not have transit service. The nearest transit stop is about 1.25 miles to the south on Marine View Drive.

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

Parking needs will not be increased by the project.

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

The Smith Island Intermodal Terminal will change the private site access to the site location which also serves the existing Cedar Grove Composting and Concrete NorWest facilities. This will entail a new access road that will pass under the BNSF mainline and located about 850 feet south of the existing private access road. This will place the intersection further away from the toe of the southbound SR 529 slip ramp. While the proximity of the existing

access drive is not a documented safety hazard (likely due to very low through (slip ramp) traffic volumes), the existing geometry is not ideal. Relocation of the site access road further south will enhance sightlines and safe stopping sight distance. The increased frequency and length of trains using this section of track could add to queues and potential safety conflicts.. This will not only eliminate rail/vehicle conflicts but will also eliminate delays and vehicle queues associated with the existing rail operations. Accordingly, this change of access will create a noticeable safety benefit. The grade separated crossing will be available for properties south of the rail terminal to utilize if they develop a road connection.

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

Yes the proposal is for rail transport of freight.

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

Smith Island Terminal asked the company that has previously analyzed traffic for Cedar Grove in 2004 and 2008, and Concrete NorWest in 2005 to review the potential traffic impacts from this project. The memo is attached to this application. Regarding trips it concluded:

Cedar Grove Compost operation was forecast to generate 288 daily trips. Based on the Smith Island Rail Terminal forecast above, the site could generate an average of 393 trips per day and 45 trips during the PM peak hour. This represents an increase of about 100 vehicles per day over the previously forecast levels at the site intersection with 34th Avenue NE. During the afternoon peak hour this increase is expected to be about 20 trips per hour over previous forecasts.

To check if this increased trip generation presented any new impacts that were not identified in the previous 2008 Cedar Grove Compost TIA, a level of service analysis was made at the intersection of the proposed new access road and 34th Avenue NE. This analysis found the level of service is LOS B with an average vehicle delay of 10.4 seconds. This is a very good level of service. While the volume at this intersection increases, the impact on the public road network is decreased from the levels forecast in the 2008 Cedar Grove Compost Traffic Impact Analysis.

The forecasted Cedar Grove traffic was forecast to use a network of City and regional streets and highways. In contrast, the trip length for new Smith Island Intermodal Terminal users will be significantly reduced as compared to the previously anticipated Cedar Grove Compost business because destinations are local rather than regional. The log export operation will impact less than 700 feet of 34th Avenue NE and only two intersections. The automobile transfer operation will impact only a small portion of the Smith Island road network. Marine View Drive and other city streets are already impacted by existing auto transport operations so there is no net new impact on these roads. Other intermodal freight users are either served by regional carriers or are serviced in existing rail yards like the Delta Yard. Thus, Smith Island Rail Terminal users have negligible net new impact on the City road network outside of Smith Island.

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

TSI found that the volumes on peak days may exceed the peak trip generation forecasted in the 2008 Traffic Impact Analysis by about 100 vehicles per day on a typical day and 20 new trips during the PM peak hour. While this trip generation represents a site-generated traffic volume increase, the impact on the City and regional road network and associated background traffic will be reduced because new site users will only rely on a limited amount of the local Smith Island road network.

The relocation of the site access drive and grade separation from the railroad would improve both safety and reduce queuing on 36th Place NE at the rail crossing. Accordingly, TSI concluded that any impacts due to increased trip generation are off-set by 1) the localized travel patterns that reduce trip length and impact on the City and regional public road system; and 2) the relocation of the site access that will reduce congestion and improve safety for all vehicles using this section of 34th Avenue NE. Thus, TSI believes that no additional mitigation is warranted as a result of the changed use of this site.

15. Public Services

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

No. The project will not create any increased need for public services.

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

There are no increased needs for public services so no additional measures to reduce or control such impacts are needed.

16. Utilities

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

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.

Electricity will be required for lighting.

C. Signature

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

Signature: _____

Date Submitted: _____