SEPA Checklist In-water and Overwater Structures Removal Project, Camas Mill, Camas, WA

### STATE ENVIRONMENTAL POLICY ACT CHECKLIST

#### A. Background

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

In-water and Overwater Structures Removal Project

#### 2. Name of applicant:

Georgia-Pacific Consumer Operations LLC (GP)

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

Georgia-Pacific Consumer Operations LLC 401 NE Adams Street Camas, Washington 98607

Applicant: Shawn Wood Vice President (Phone No.: 360-834-8162)

Technical Contact: Caleigh Belkoff Environmental Manager Phone No.: 360-834-8485

#### 4. Date checklist prepared:

March 10, 2023

#### 5. Agency requesting checklist:

City of Camas

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

Work in-water and overwater would occur during approved in-water work windows and following receipt of all approvals. Work would span approximately three years, with the final schedule dependent on the in-water work windows. At the time of this document development, demolition is expected to begin in 2023 following receipt of all Project permits and approvals. However, the project schedule will be influenced by work-window timing, weather, river stage, and contractor and equipment availability. The project work hours are expected to be Monday through Friday from 7 AM to 5 PM and Saturday 7 AM to 3:30 PM.

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

No additions, expansion, or further activity related or connected to this proposal are planned.

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

- Appendix 1: *Project Description Narrative*: Prepared by Tetra Tech; Bothell, WA, February 2023.
- Appendix 2: <u>Shoreline Report and Critical Areas Review and Impact Assessment</u>: Prepared by Tetra Tech; Bothell, WA, February 2023.
- Appendix 3: *Biological Assessment*: Prepared by Tetra Tech; Bothell, WA, February 2023.
- Appendix 4: <u>Inventory of Historic Properties and Historic Context Study</u>: Prepared by WSP USA Environment & Infrastructure Inc.; Portland, OR, February 2023.
- Appendix 5: <u>Archaeological Resources Survey and Literature Review</u>: Prepared by WSP USA Environment & Infrastructure Inc.; Portland, OR, March 2023.
- Appendix 6: *Inadvertent Discovery Plan*: Prepared by Erik Anderson; Kirkland, WA, February 2023.
- Appendix 7: <u>Frequently Flooded Areas Report and Flood Hazard Assessment for Demolition of</u> <u>Encroachments</u>: Prepared by WSP USA Environment & Infrastructure Inc.; Portland, OR, February 2023.
- Appendix 8: <u>Certification of No-Rise Report for Removal of Structures along Camas Slough</u>: Prepared by WSP USA Environment & Infrastructure Inc.; Portland, OR, February 2023.
- Appendix 9: <u>Certification of No-Rise and Description of Flood Hazard for Demolition of One Dolphin</u>: Prepared by WSP USA Environment & Infrastructure Inc.; Portland, OR, February 2023
- Appendix 10: <u>Revised (Version 3) Tier 1 Evaluation for Dredged Materials Management</u>: Prepared by Tetra Tech; Bothell, WA, February 2023
- Appendix 11: <u>Sampling and Analysis Plan for the Characterization of Sediments in the Camas Slough,</u> <u>Washington</u>: Prepared by Tetra Tech; Bothell, WA, February 2023.
- Appendix 12: <u>Preliminary Stormwater Management Plan</u>. Prepared by Tetra Tech; Bothell, WA, March 2023
- Joint Aquatic Resources Permit Application: To be submitted at a later date
- WDFW Hydraulic Permit Application (HPA): To be submitted at a later date
- Stormwater Pollution Prevention Plan (SWPPP): To be submitted Prior to construction

## 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.

Prior to the start of this project, abatement of regulated materials will take place for any structures that have been demonstrated to have regulated hazardous materials, including asbestos containing materials. A *Notification of Demolition and Notification of Intent to Remove Asbestos* will be submitted to the Southwest Clean Air Agency by the contractor no later than 10 days prior to the start of any abatement. All asbestos containing materials along with any other regulated hazardous material determined to be present will be abated prior to structure demolition activity.

A proposal to restore topographic grades and for stormwater collection facilities installation at the North Wood Chip Yard has been provided to the City of Camas by GP. That project would occur on the main Mill parcel, but outside the footprint of the *In-water and Overwater Structures Removal Project* described here.

## **10.** List any government approvals or permits that will be needed for your proposal, if known. <u>Federal</u>

- Clean Water Act (CWA) Section 404 Permit US Army Corps of Engineers (USACE)
- River and Harbors Act, Section 10, Navigable water protection, USACE
- Endangered Species Act Section 7 compliance, US Fish and Wildlife Service (U.S. FWS), National Oceanic and Atmospheric Administration (NOAA Fisheries Service)
- National Historic Preservation Act, Section 106 consultation, USACE
- Suitability Determination for in-water disposal of sediments, Dredged Materials Management Program (DMMP)

#### State

- Clean Water Act, Section 401 Water Quality Certification Washington Department of Ecology (Ecology)
- Written approval for Non-routine Discharges under existing National Pollution Discharge Elimination System (NPDES), Permit No. WA000256 for waste discharge, per Permit Condition S7, Ecology
- Notice of Intent (NOI) for coverage under the Washington State Construction Stormwater General Permit, Ecology
- Hydraulic Project Approval (HPA) Washington Department of Fish and Wildlife (WDFW)
- Archaeology and Historic Properties review, Washington Department of Archaeology and Historic Preservation (DAHP)

#### City of Camas

- SEPA Process and Determination
- Shoreline Substantial Development Permit/Conditional Use Approval
- Floodplain Review and Zero Rise Evaluation
- Historic Properties and Archaeological Resources Review
- Clearing and Grading Approval City of Camas

#### Clark County

- Floodplain Review and Zero Rise Evaluation
- Potentially Materials Reuse Approvals Clark County Public Health

## 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.

GP is planning to remove and/or demolish several structures associated with prior operations at the Camas Mill. The structures to be removed are located in-water and/or overwater on the Columbia River and Camas Slough and are located within the Shoreline Management Zone of the City of Camas or are in-water within unincorporated Clark County.

The structures to be removed include:

- A warehouse;
- Five docks/piers;

- Conveyor housings;
- An aboveground oil storage tank;
- Crane foundation; and
- Approximately 3,000 pilings that are associated with the above structures, serve as mooring dolphins, or are abandoned.

Photographs of the structures to be removed are presented in *Project Description Narrative* (Appendix 1). The proposed project will require work within the ordinary high-water mark (OHWM) of the Columbia River and Camas Slough. Some of the structures to be removed are located on State-owned land currently leased by GP through the Washington Department of Natural Resources (WDNR).

**Table 1** summarizes structures to be demolished, indicates where the structures are located, and provides an estimate of the disturbance area.

Structure to be Demolished	Location of Structure	Area of removal with disturbance area for dredging (SF)
Dolphins and pilings	Lease Areas (LA): 3, 4, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, and 19, in Camas Slough and Columbia River	890 <sup>2</sup>
Downriver dolphin in Clark County	LA 1, Columbia River	30
Dock Warehouse piers and access dredging	LA 17, Camas Slough	58,710 (includes dredge prism)
Berger Crane foundation	LA 17, Camas Slough	19,370 (includes fill prism)
Tug Dock	LA 17, Camas Slough	-0-
<u>Riverbank Structures</u> <sup>1</sup> : Truck Dock, Dock Warehouse & PECO Dock	North Bank of Camas Slough, Main Mill Parcel	40,450
Aboveground Oil Storage Tank	Main Mill Parcel	-0-5
South Wood Chip Storage Area	Main Mill Parcel	155,580
Product Conveyor Housing <sup>3</sup>	Main Mill Parcel	-0-
Wood Chip Conveyor Housings <sup>3</sup>	Main Mill Parcel	-0-

#### Table 1: Summary of Structures to be Removed.

Note:

1. Together, the Truck Dock, Dock Warehouse, and PECO Dock cover approximately 1,055 lineal feet along the riverbank. Given the contiguous nature of the structures, removal activities are summarized for all three structures together.

Assumes a 30 square foot footprint for each dolphin to be removed.

3. Conveyor housings are elevated, crossing over either the South Wood Chip Storage Area or the Truck Dock area.

No area of ground disturbance is expected as removal and riverbank restoration would be within the existing structure's footprint.

No area of ground disturbance is expected as removal is planned only to existing slab level.

Abbreviations:

 $\overline{LA} = Lease Area, per GP 2014 lease with WDNR$ 

SF = square feet

**Table 2** summarizes piling removal by location. Dolphins are groups of 3, 5, 7, or 9 piles individually installed at an angle and bound together to create a sturdy structure to serve for mooring or for protection of an adjacent structure from potential impacts. A complete impacts analysis including methods and results discussion is provided in the *Shoreline Report and Critical Areas Review and Impact Assessment* (Appendix 2).

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Table 2:	Pilings to be Removed.	
Location	In-water or Overwater	Approximate Number of Pilings <sup>1</sup>
Open-water dolphins and pilings	In-water	250
One downriver dolphin in Clark County	In-water	9
Pilings at riverbank that are associated with in-water structures <sup>2</sup>	In-water	200
Piling associated with overwater structure foundations <sup>3</sup>	Overwater	2,500
Estimate	Approximately 3,000	

Note:

1. Numbers of pilings were estimated, and the total estimated number has been rounded up.

2. In-water pilings include pilings associated with mooring dolphins, remnant riverbank pilings, sheet pilings, pilings supporting the Dock Warehouse Piers, and pilings at the Tug Dock.

3. Overwater pilings include pilings associated with the foundations supporting the Dock Warehouse, PECO Dock, and Truck Dock along the riverbank.

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 proposed project lies within the City of Camas, Washington, except for one dolphin to be removed on the Columbia River that is located outside the city limits within unincorporated Clark County, Washington. (**Table 3**). The Project location, overview, and site plan figures, along with site photos are provided in the *Project Description Narrative* (Appendix 1).

The Project area consists of a portion of the Camas Slough, which runs between Lady Island and the city of Camas, Washington, on the north bank of the main channel of the lower Columbia. The project area lies within Township 1 North, Range 3 East, Sections 8, 9, 10, 11, 15, and 16, Willamette Meridian. The project lies between RM 117 and 121, with much of the proposed activity at approximately RM 119 to 120 located in the Camas Slough.

As stated, the structures to be removed are located adjacent to the riverbank, or entirely or partly below the OHWM of the Camas Slough or Columbia River main stem and are located within either the City of Camas Shoreline Management Zone or Clark County Shoreline Management Zone. One dolphin located downriver of the main Mill parcel at Columbia River RM 117 and is on State Aquatic bedlands within unincorporated Clark County.

The project office is located at the Camas Mill main office at 401 NE Adams Street, Camas, WA 98607.

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Camas	Mill,	Camas,	W	A

Table 3: Parcels in the Project Area.		
Assessor Parcel Number	Owner <sup>1</sup>	Tax Parcel Type Description/Zoning/location
08370-0000	Fort James Camas, LLC (GP)	Manufacturing—paper products/Heavy Industrial/ Lady Island
09104-4013	Georgia-Pacific Corporation	Manufacturing—lumber and wood products/Heavy Industrial
09104-4015	Fort James Camas, LLC (GP)	Manufacturing—paper products/Heavy Industrial/ Main Mill Parcel
09104-4027	Specialty Minerals Inc. <sup>2</sup> (GP)	Storage warehouse/Heavy Industrial
50090-1000	Fort James Camas, LLC (GP)	Tidelands/Water
50090-2000	Fort James Camas, LLC (GP)	Tidelands/Water
50090-3000	Fort James Camas, LLC (GP)	Tidelands/Water
50090-4000	Fort James Camas, LLC (GP)	Tidelands/Water
50081-4000	Fort James Camas, LLC (GP)	Tidelands/Water
50081-4001	Fort James Camas, LLC (GP)	Tidelands/Water
50081-7000	Fort James Camas, LLC (GP)	Tidelands/Water
50081-8000	Fort James Camas, LLC (GP)	Tidelands/Water

1. The previous corporate name, Fort James Camas LLC, is shown on County's tax parcel information.

2. Specialty Minerals was a part of Fort James Camas, LLC.

#### **B.** Environmental Elements

1. Earth

#### a. General description of the site:

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

Structures to be removed are located in-water and over-water. Structures to be demolished occur in the Camas Slough, along the banks of the Camas Slough at the Camas Mill property, and along the Columbia River.

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

Areas of the Camas Slough riverbank have the steepest slopes with some slopes at approximately 30%.

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.

No areas within the project are used for agricultural purposes. No areas of long-term agricultural significance occur within the project vicinity. Soils on the main Mill parcel are comprised of fill materials. Sediments at river locations are generally comprised of sandy and gravelly materials.

Where natural riverbanks exist in the project area they are mapped as either Newburg silt loam or Sauvie silt loam series. In the project area, the north side of Lady Island riverbank were mapped as Newburg silt loam series, while the western extent of Lady Island were mapped as Sauvie silt loam series. These natural soils are silty loams derived from alluvium.

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

No surface indications of historic or currently active landslides or unstable soils are indicated or mapped in the project area, on the parcel, or in the immediate vicinity.

## 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.

**Table 4** provides a summary of the fill and excavation quantities above and below OHWM.

All fill materials will be comprised of materials approved for the location. Some fill materials will be available from the Lady Island Dredge Materials Management Area where clean dredged fill material has been stored (**Appendix 1-Figure 1**). Riprap and larger material retrieved from the riverbanks during excavation would be stockpiled and reused where appropriate.

Structure to be Demolished	Filling or	Fill (+)/Excavate (-) Quantity (Cubic Yard)	
Structure to be Demonstru	excavation/dredging	Below OHWM	Above OHWM
Dock Warehouse piers access dredging	Dredging	-10,500	-0-
Berger Crane foundation	Filling	+3,500	-0-
<u>Riverbank Structures<sup>1</sup></u> : Truck Dock, Dock Warehouse & PECO Dock	Excavation/dredging and filling	+1,230 / -2,990	+18,300 / -17,100
South Wood Chip Storage Area	Excavate remaining wood chips and backfill to previous grade	-0-	+11,100 CY

#### Table 4: Summary of Fill or Excavation Quantities

Note:

. Together, the Truck Dock, Dock Warehouse, and PECO Dock cover approximately 1,055 lineal feet along the riverbank. Given the contiguous nature of the structures, removal activities are summarized for all three structures together.

Abbreviation: CY = cubic yard OHWM = ordinary high water mark

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

Vegetation clearing for the project is very limited as the project removes existing structures. Erosion is not anticipated from structure demolition. Following demolition of structures on the main Mill parcel, the riverbank will be reshaped to allow natural drainage and revegetated. Best management practices will be utilized to eliminate erosion and contain sediment during removal of structures from the riverbank and reshaping.

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

In-water structure removals will result in no change of impervious surfaces. Along the riverbank on the main Mill parcel where overwater structures will be removed, impervious surface is currently 100 percent. At the completion of the project, when structures have been removed, less than 10 percent of the project footprint will have retained impervious surfaces. No new impervious surfaces are anticipated.

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

Best management practices (BMPs) for reduction and control of erosion will be implemented throughout the project to reduce potential for erosion and provide sediment containment and control. Example BMPs include perimeter silt fencing where appropriate, and straw waddles and other BMPs would be installed as needed. A list of additional BMPs to be implemented are available in the *Project Description Narrative* (Appendix 1, Section 6.0), as well as the Preliminary Stormwater Management Plan (Appendix 12).

2. Air

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.

<u>During Demolition Activities</u>: The project includes demolition of structures, which may result in temporary and transient increase in fugitive dust emissions during work activities. Prior to demolition occurring, GP will work with its contractor to ensure all air quality approvals needed from Washington's Southwest Clean Air Agency are in place.

Other emissions during demolition are anticipated to include primarily vehicle and equipment emissions from worker trucks, machinery, and equipment to disassemble and remove materials from buildings and facilities, and from haul trucks to transport items for disposal and recycling. Emissions of particulate matter (PM), carbon monoxide (CO), nitrogen oxides (NOx), sulfur dioxide (SO<sub>2</sub>), volatile organic compounds (VOCs), and various greenhouse gases (GHGs) are expected from the use of gasoline and diesel fuels.

<u>Post-Demolition Activities</u>: No air emissions would occur following the project. No long-term maintenance of any area of the project would be required. No new operations area planned in the project area.

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

No off-site sources of emissions or odor are associated with this proposal or may affect the project are anticipated.

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

Demolition will incorporate best management practices to reduce the risk of fugitive dust emissions. Best management practices include, removing dust prior to demolition where needed, watering areas during building felling to minimize fugitive dust, routine site sweeping, as well as minimizing the extent of dust disturbance and other dust containment measures. Machinery used for demolition will incorporate standard air emission reduction technologies, and a no-idle policy will be used during loading and unloading vehicles to reduce emissions.

#### 3. Water

#### a. Surface Water:

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

The project includes in-water and over-water structures to be removed in the Camas Slough and Columbia River. Riverine wetlands are present in the project area or adjacent to the project area within 200 feet.

- <u>Columbia River</u>: The Columbia River is one of the largest rivers in North America, extending approximately 1,240 miles, draining approximately 258,000 square miles, and emptying into the Pacific Ocean. The project area is within the Lower Columbia Reach, and located approximately 120 river miles from the Pacific Ocean. The Columbia River experiences low river stages (low water levels) generally in October with high stages in June most years. The change in water depth between June and October in the project area is approximately 10 feet.
- <u>Camas Slough:</u> Camas Slough is an approximately 2.4-mile-long side channel of the Columbia River. The confluence with the Washougal River occurs at the far upriver end of the Camas Slough and no portion of the project is on the Washougal River. The Camas Slough has similar river stages as the Columbia River.
- <u>Riverine Wetlands</u>: Riverine emergent wetlands occur along the Camas Slough riverbanks at the main Mill parcel and Lady Island. Located at the base of the riverbank, the riverine wetlands extend from land waterward to the point where deep water prevents persistent rooted vegetation, usually at about 6 feet of depth. The wetland areas are seasonally inundated for long durations, from November through June in most years. Additional details regarding the wetland areas and their locations can be found in the *Shoreline Report and Critical Areas Review and Impact Assessment* (Appendix 2).

### 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.

As stated, all proposed structures removal require work to occur over, in, or adjacent to the described waters. Figures are included in *Project Description Narrative* (Appendix 1) and show locations of the structures to be removed relative to the waters. Removal of the in-water and overwater structures would occur in a manner that is not disruptive to ongoing operations at the Mill and in a manner that is protective of the environment.

Work in-water and overwater to remove structures includes:

- 1. Remove in-water pilings and dolphin,
- 2. Dredging for access to, and demolition of, the three Dock Warehouse piers,
- 3. Berger Crane Foundation demolition to river stage and fill to create shallow nearshore habitat and cover the remnant foundation,
- 4. Demolish Dock Warehouse,
- 5. Demolish PECO Dock,
- 6. Remove floating Tug Dock,
- 7. Demolish Truck Dock, and
- 8. Riverbank shaping to decrease slope and create final riverbank topography.

The *Project Description Narrative* (Appendix 1) provides details regarding proposed removal methods for structures, photos of the structures, and additional relevant figures.

## 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.

**Table 5** provides a summary by location of sediment quantities to be dredged in the Columbia Riverand Camas Slough. Dredged materials will be placed at the Lady Island Dredge Materials ManagementArea (see Figure 1 for location).

Project Activity	Waterbody	Impact location	Duration of impact	Amount of material to be placed in or removed from River (cubic yards)	Area of River directly affected. (sq. ft.)
Fill at Berger Crane Foundation, new shallow riverbed contours	Camas Slough	Below OHWM	Permanent	+3,500	19,018 sq. ft
Fill and Excavation at riverbank structures (Wood Chip area, Truck Dock, Dock Warehouse, PECO Dock), reshape riverbank	Camas Slough	Below OHWM	Permanent	+1,230 / -2,990	67,356 sq. ft.
Dredge at Dock Warehouse Piers, channel deepening for access for demolition	Camas Slough	Below OHWM	Temporary, short- term, <90 days	-10,500	59,153 sq. ft.
Total Project; net amount of r	material to be	placed or remove	ed; below OHWM and from Floodway:	-8,760 cubic yards	
The following Excavation and F the regulatory Shoreline Buffer	ill quantities r.	occur above OHV	VM, within the 100-ye	ear floodplain and in	
	Associated Waterbody	Location	Duration	Fill or Excavate Quantity (CY)	Area of Shoreland directly affected (sq. ft.)
<i>Excavate &amp; Fill</i> at Truck Dock, Dock Warehouse, PECO Dock; reshape slopes to 5:1 and 4:1; match existing grades.	Camas Slough	Above OHWM; Main Mill Parcel	Permanent Fill placement	+18,300 / -17,100	168,312 sq. ft.
<i>Excavate &amp; Fill</i> at South Wood Chip Storage Area; excavate remaining wood chips and backfill to previous grade.	Camas Slough	Above OHWM; Main Mill Parcel	Permanent Fill placement	+11,100	155,580
Total Project; Net Amount of material to be placed or removed; above OHWM:				+12,300 cubic yards	

#### Table 5: Summary of In-water Dredge and Fill Below OHWM of Camas Slough and Columbia River

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

No surface water withdrawals or diversions will be needed. During demolition, all water for dust control or other activities will be acquired from the Mill's existing water supply, City of Camas potable water supply, and/or City of Camas fire water supply, as appropriate.

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

The area of proposed activity lies in the Special Flood Hazard Area (SFHA) and floodway on the north bank of the Columbia River (including the Camas Slough, which is treated as part of the Columbia River in the FEMA Flood Insurance Study [FIS]). The proposed demolitions would be in an area that lies in FIRM Panels 529 (downstream of Lady Island), 533 (most of Lady Island and the Camas Slough), and 534 (the eastern portion of Lady Island and areas upstream) published by FEMA dated effective September 5, 2012 (panels 529 and 533), and January 19, 2018 (panel 534).

An evaluation of the effect of the project activities on flood hazard, certification of no-rise, and figures are presented in the following:

- Appendix 7: Frequently Flooded Areas Report and Flood Hazard Assessment for Demolition of Encroachments. WSP USA Environment & Infrastructure Inc., February 2023.
- Appendix 8: Certification of No-Rise Report for Removal of Structures along Camas Slough. WSP USA Environment & Infrastructure Inc., February 2023.
- Appendix 9: Certification of No-Rise and Description of Flood Hazard for Demolition of One Dolphin. WSP USA Environment & Infrastructure Inc., January 2023.

## 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 waste materials will be discharged to surface waters. Any demolition debris materials that inadvertently reach water will be removed.

#### **b.** Ground Water:

# 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 be used for this project that is beyond the current groundwater rights associated with the Mill. Water for the project will be supplied from the Mill's existing wells. Water may be used for dust suppression and other demolition BMPs. The small amounts of water to be used intermittently during demolition would be *de minimis* compared to the amount of water consumed daily by the Mill. No water used during demolition will be actively discharged to groundwater. Water utilized during the demolition of upland structures will be collected, to the extent possible, and conveyed for treatment at the Lady Island Wastewater Treatment Facility.

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 discharge of waste material into the ground from septic tanks or other sources will occur. No septic system occurs within the project area.

#### 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.

Potential runoff sources would include stormwater from precipitation events and any waters used for demolition dust control or other demolition activities.

Existing Site Conditions: The main Mill parcel has an extensive area of industrial stormwater collection and treatment. On-site stormwater is collected in catchments and conveyed to the Lady Island Wastewater Treatment Facility. Following treatment, the water is released to the Columbia River under the Mill's Industrial NPDES permit. The system collects stormwater from the Dock Warehouse, Truck Dock, conveyors, oil tank, and as infiltrated stormwater from underdrains at the South Wood Chip Yard lying adjacent to the PECO Dock and Dock Warehouse.

The PECO dock is outside the industrial stormwater collection footprint. This area has a natural stormwater runoff that flows into the adjacent Camas Slough or Columbia River.

<u>During Demolition</u>: During demolition, stormwater runoff and other wastewater would be conveyed to the existing industrial stormwater collection system for the Dock Warehouse, Truck Dock, conveyors, oil tank, and at the South Wood Chip Yard. Treatment at Lady Island Wastewater Treatment facility would occur prior to release of treated water to the Columbia River.

Floating silt curtains would be used during demolition of the PECO dock to retain any sediment and reduce the risk of turbidity. Demolition of these sites are currently proposed to be timed to occur during for low river stages, and thus much of the work would be completed in-the-dry further reducing the risk of sedimentation. The ground surface will be stabilized with appropriate materials, such as crushed gravel, to prevent erosion following demolition.

<u>Post-demolition Conditions:</u> Following completion of the project, the area that currently includes the Dock Warehouse and Truck Dock will be regraded (**See Appendix 1, Figure 5**) and stormwater from the remaining project footprint will naturally discharge, including areas at the former PECO Dock. Additional details on best management practices for stormwater management are provided in the project's Preliminary Stormwater Management Plan (See **Appendix 12**).

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

No waste is anticipated to enter groundwater because of this proposed project.

The proposed project includes in-water work for removal of dolphins and piers as well as over-water structure removals. Inadvertent introduction of debris to surface waters could occur during activities. All demolition would be planned to reduce the risk of introduction of debris to surface waters.

For overwater structures, several approaches will be employed to reduce the risk of a materials entering surface waters. To the extent that agencies allow, all overwater structure demolition will be timed to occur when river stages are low so that the riverbank is not covered by water. Riverbank structures would be demolished with upper stories removed first and working from the upland side, so that ground floors and riverside walls serve to contain debris. Other management practices to contain debris and potential sedimentation include floating silt curtains in-water and silt curtains on the riverbank. Debris nets and utilizing barges to protect surface waters would also be implemented.

Best management practices for the removal of pilings will be implemented following WDNR (2017<sup>1</sup>) and EPA (2016<sup>2</sup>) guidance. Following the guidelines reduces the risk of waste materials entering the water. The guidance has been developed to ensure water quality protection protect habitat quality. Guidelines include methods to minimize turbidity by avoiding sediment disturbance, avoiding debris entering the water, and providing habitat protection, including noise reduction where possible. Guidelines for vibratory extraction, direct pull, clamshell removal, or cutting removals, as well as guidelines for barge work operations, containment, debris capture, and disposal of pilings, sediment, and other residues would be followed.

Stormwater from construction barges generally runoff to the river, except for areas on the barges that with contain sediment materials or areas of removed materials. These containment areas would incorporate BMPs to control the risk of sediment or other materials reaching the river during storms. BMP commonly employed to contain incidental river sediments and other materials could include coir logs or silt curtains, or other materials (Appendix 12).

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

For in-water removals, no change in drainage would occur because of the removals. As stated above, a change in stormwater collection would occur because of removals where the industrial stormwater footprint area is reduced and areas along the riverbank are returned to natural drainage.

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

During demolition of riverbank structures, BMPs will be used to control stormwater runoff and measures to reduce or control surface runoff include:

- Minimized disturbance to existing vegetation.
- Areas that would be bare earth following structure removal will receive a stabilizing layer of crushed gravel.
- All demolition will occur on existing impervious surfaces to the extent possible, including staging and materials management.
- Collection points and water bars will be implemented on-site during demolition activities to direct stormwater to receiving inlets to be conveyed to the Lady Island Wastewater Treatment facility.

Additionally, debris material management will include the following BMPs:

- Debris piles will be minimized, and when present will be managed to not generate stormwater runoff that could reach the surface water.
- Demolition materials management areas will be identified and maintained on-site and will include appropriate sediment controls and stormwater controls.
- Installing silt fences, straw bales, straw wattle and/or containment berms around major demolition areas to control possible flow of loose debris.
- Managing runoff and elutriate water.

<sup>&</sup>lt;sup>1</sup> Washington Department of Natural Resources (WDNR). 2017. Derelict Creosote Piling Removal Best Management Practices for Pile Removal and Disposal. Last update 1/25/2017. Accessed 11/11/2020. https://www.dnr.wa.gov/publications/aqr\_rest\_pileremoval\_bmp\_2017.pdf?zynetrzfr

<sup>&</sup>lt;sup>2</sup> U.S. Environmental Protection Agency (EPA). 2016. Best Management Practices for Pilling Removal and Placement in Washington State. February 18, 2016. Region 10, EPA. Accessed 11/11/2020.

https://www.nws.usace.army.mil/Portals/27/docs/regulatory/RGPs/RGP6/EPA%20BMPs%20 for %20 Piling%20 Removal%202-18-16.pdf?ver=2017-02-07-230329-363

- Routine inspections of any temporary piles to verify water quality protections are functioning properly.
- Demolition debris will be removed from the site and disposed at approved locations.

For dredging, an Evaluation for Dredged Materials Management Plan and SAP has been developed (Appendix 10 and 11, respectively, and include the following best practices:

- Hay bales and/or filter fabric may be placed over the barge scuppers to help filter suspended sediment from the barge effluent, if needed based on sediment testing results.
- The contractor will be required to use a tightly sealing bucket and to monitor for spillage during transfer operations.
- Visual water quality monitoring will be implemented and, if necessary, follow-up measurements will be conducted at the removal and upland transfer location to confirm no uncontrolled releases back to the river.

Additional BMPs are outlined within the *Project Description Narrative* (Appendix 1, Section 6.0) as well as in the Preliminary Stormwater Management Plan (Appendix 12).

#### 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
- <u>X</u>\_shrubs (including blackberry)
- X grass, weeds and other cleared-land vegetation
- pasture
- \_\_\_\_ crop or grain
- Orchards, vineyards or other permanent crops.
- \_X\_\_Wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- <u>X</u> water plants: water lily, eelgrass, milfoil, other
- \_\_\_\_ other types of vegetation

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

No permanent changes in vegetation would result from the project. No trees would be removed by the project. BMPs would be implemented to control the project footprint and minimize any temporary impacts to vegetation. Upland areas will be recontoured and revegetated with an approved seed mix.

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

According to USFWS IPaC online tool the following species were identified on or near the site:

- Bradshaw's Desert-parsley (Lomatium bradshawii),
- Golden Paintbrush (Castilleja levisecta),
- Kincaid's Lupine (Lupinus sulphureus spp. Kincaidii),
- Nelson's Checker-mallow (*Sidalcea nelsoniana*),
- Water Howellia (Howellia aquatilis), and
- Willamette Daisy (*Erigeron decumbens*).

As further explained in the *Biological Assessment* (Appendix 3) these species are not known to be present on the site and were deemed to be unlikely to occur within the project site due to the lack of preferred or suitable habitat for these species.

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

Wetland areas that are temporarily impacted by dredging/excavation will be allowed to re-vegetate following placement of clean fill materials to re-establish grades.

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

Common Name	Scientific Name	Noxious Weed Class
Indigo bush	Amorpha fruticosa	В
Canada thistle	Cirsium arvense	С
Field bindweed	Convolvulus arvense	С
Teasel	Dipsacus fullonum	С
English ivy	Hedera helix	С
Garlic mustard <sup>1/</sup>	Allaria petiolata	А
Himalayan blackberry	Rubus armeniacus	С
Reed canarygrass	Phalaris arundinacea	С
Tansy ragwort	Tanacetum vulgare	С
Common St Johnswort	Hypericum perforatum	С
Hairy cat's ear	Hypochaeris radicata	С

<sup>1/</sup> Species has not been documented within the Project boundary associated with the IWOW Structures Removal Project, but is being treated in a small area on the mill site.

#### 5. Animals

### 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.

**Birds:** Birds known to be present in the project area include American Robin (*Turdus migrotorius*), mallard (*Anas platyrhynchos*), American black swift (*Cypseloides niger*) least sandpiper (*Calidris minutilla*), Canada goose (*Brant canadensis*) red-tailed hawk, (*Buteo jamaicensis*), great blue heron (*Ardea herodias*), bald eagle (*Haliaeetus leucocephalus*), barn swallow (*Hirundo rustica*), Steller's Jay (*Cyanocitta stelleri*), American crow (*Corvus brachyrhynchos*), Brandt's cormorant (*Phalacrocorax penicillatus*), osprey (*Pandion haliaetus*).

Mammals: Deer, beaver, river otter, racoon, coyote, mice, rabbits, and other small mammals.

Fish: Bass, salmon, trout, steelhead, eulachon, sturgeon, and others are likely to present in the river.

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

The likelihood of listed species occurring in the project area as well as the projects potential effects on these species is provided in the *Biological Assessment Report* (Appendix 3). Of the federally protected species identified by the USFWS and NOAA Fisheries, the following species and their critical habitat may occur in the action area:

• Lower Columbia River fall Chinook (Oncorhynchus tshawytscha),

- Columbia River Chum (O. keta),
- Lower Columbia River Coho (O. kisutch),
- Lower Columbia River Steelhead (winter and summer) (O. mykiss),
- Pacific eulachon (Thaleichthys pacificus), and
- Bull trout (Salvelinus confluentus).

All fish species on the list have designated Critical Habitat within the project area.

Other species that are threatened or endangered that may occur near project area as indicated by the PHS mapper included gray wolf, northern spotted owl, streaked horn lark, and yellow-billed cuckoo. As further explained in the *Biological Assessment* (Appendix 3), these species are all deemed to be unlikely to occur within the project site due to the lack of recent observations or lack of suitable habitat within the project area.

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

The project site is within the Pacific Flyway for waterfowl. Migration of salmonids also occurs in the project area. The Lower Columbia River is utilized by anadromous salmonids as adults migrating upstream to spawn and as juveniles to migrate downstream to enter the ocean.

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

The project would enhance wildlife habitats by the removal of numerous in-water and overwater structures which would result in a net increase in wildlife habitat by removing overwater shade, and removal of refugia for aquatic predators, reducing avian predator perches, and increasing shallow nearshore habitat. Other long-term beneficial effects that would enhance wildlife include the removal of creosote treated pilings. Following the structures removal activities, areas of disturbed riverbanks and uplands, such as the Berger Crane foundation, would be graded to slopes similar to adjacent natural riverbank areas. Shallow nearshore area will be created in a former area dredged for navigation purposes. Benefits to wildlife are detailed in the *Biological Assessment* (Appendix 3).

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

No known invasive animal species are present on or near the site.

#### 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.

After demolition associated with the In-water and Overwater Structures Removal Project is completed, the project will not use any energy.

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

The project will not affect the potential use of solar energy by 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:

As the project is a demolition project, energy conservation features include efforts/practices to use electrical and fuel-derived power during the work as efficiently as possible. A no-idle policy per Washington standards will be enforced during the project.

#### 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.

There are very limited risks for toxic chemical exposure, fire, explosion, spill, or hazardous waste as a result of the demolition. No industrial chemicals are within the project footprint as industrial activities have ceased at these locations and any residuals were removed previously.

During demolition, BMPs will be used to mitigate risks of fire or explosion. Any hazardous materials generated from abatement of regulated materials prior to demolition will be handled by certified personnel according to regulations and contained and disposed of in appropriate approved landfills. Following demolition, all regulated materials will have been removed from the project area.

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

In 2020, Ecology assigned the main Mill parcel as Site No. 15156 under the State cleanup program. At the time of this checklist, planning for site investigations has not started and site investigations have not occurred. No information on possible contamination of the main Mill parcel is available. Sediments slated for dredging would be evaluated by chemical and physical testing and results reviewed by agencies prior to receiving approvals for disposal or reuse of sediments. No other portions of the project have known or suspected contamination.

## 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.

An underground regional gas transmission pipeline located outside the project area crosses the main Mill parcel, Camas Slough and Lady Island. All work for this project would be performed in compliance with safety operations at Camas Mill.

## 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.

Within the project area, no toxic or hazardous chemicals will be stored, or used during the demolition project. Regulated materials will be removed from the site during the project and contained and disposed of at approved landfill locations. Following demolition and completion of the project the area will have no operations to result in toxic or hazardous chemicals being stored, used, or produced within the project area. The Mill will continue to be in operation on the main Mill parcel following mill safe operations requirements.

#### 4) Describe special emergency services that might be required.

The Mill is staffed at all times and can respond in cases where emergency services may be required. This project is not anticipated to place an additional burden on public emergency resources.

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

Abatement of known locations of regulated materials in structures to be demolished and removed will be performed by certified abatement contractors, and waste materials will be disposed of off-site at an authorized and licensed location.

#### b. Noise

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

Existing noise in the project area includes highway traffic noise, heavy industrial activities, and railroad noise. Traffic noise originating along State Route 14 on crossing to and from and on Lady Island is prevalent throughout the project area. Industrial noise associated with the mill operations are present. Noise from passing trains on the BNSF rail line also is present intermittently. Background noise for the project area is estimated at 50 to 60 decibels (dBA) during weekday daylight hours, exclusive of train noise. These noises do not affect the project.

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

• <u>Short-term noise during demolition</u>: Noise from demolition activities would be expected to occur during the standard project work hours of Monday through Friday from 7:30 AM to 5 PM and Saturdays from 7:30 AM to 3:30 PM. No work is anticipated at night.

Noise during demolition on the main Mill parcel would include vehicle traffic accessing the site, as well as noise generated by gas and diesel motors typical of mobile construction/demolition equipment, such as dump trucks, excavators, front-end loaders, and cranes. Demolition activities may also result in short-term bursts of vibration and pounding along with combustion engine noise from piling removal and break-up and/or collapse of concrete structures. Gas-powered electrical generators may be used to provide support for lighting, air compression, water pumps, or other support during abatement and demolition. Noise may result from demolition debris and material management in preparation for loading and transport from the site, such as saw cutting, drilling, and pounding. Minor amounts of jack hammering may be required to remove some concrete.

It is estimated that during demolition, intermittent peak sound levels could reach from 90 to 110 dBA  $L_{max}$  at the noise source, depending on the type and location of the activity. Sound levels of 110 dBA  $L_{max}$  are perceived as very loud and equivalent to concerts, car horns, and sporting events. At these levels, exposure may be harmful after 30 minutes, and hearing protection would be required for construction workers and contractors who would be exposed to these levels.

Additionally, the project would also result in hydroacoustic noise due to piling removal using a vibratory hammer and concrete removal using a hoe-ram operation and/or saw cutting. Other potential sources of underwater noise that could occur as a part of this project include dredging activities and barge and other vessel use. It is estimated that during demolition, intermittent peak hydroacoustic sound levels could reach from 140 to 206 dB at peak from the noise source, depending on the type and location of the activity. Sound levels that reach 206 dB have the potential to cause fish injury and sounds levels that reach 150 dB have the potential to cause fish disturbance regardless of fish size. Additional calculations regarding hydroacoustic noise effects are detailed in the *Biological Assessment* for the In-water and Overwater Structures Removals Project (**Appendix 3**).

Note that no blasting is planned for this demolition project.

• <u>Long-term noise</u>: No long-term noise would be created or associated with the project as no new activities are planned for the project area following demolition.

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

Demolition operations will occur during normal working hours. A variety of routine and conventional noise best management practices will be put in place during demolition to reduce noise impacts. Quieting will be accomplished using conventional engineering controls, such as machine mufflers, substituting quieter equipment where possible, and equipment maintenance actions that reduce machine and engine noise. Best management practices include a no-idle policy while on-site and shutting down noisy equipment when not being used. Given the location within an operational industrial site, demolition noise will not result in unusual noise generation.

#### 8. Land and Shoreline Use

## 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 area was first developed as a paper manufacturing site and has been operational since 1883. However, the structures slated for demolition and removals are currently idle. The project will result in waterfront operations to no longer be possible from the main Mill parcel as there will be no access to the river. Overall current land uses on the main Mill parcel, and nearby or adjacent properties will remain unchanged.

#### 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?

The project site has not been used for working farmland or working forest lands. No agricultural lands or forest lands will be converted as a result of the proposal.

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

The project will not affect or be affected by surrounding working farm or forest land.

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

Multiple structures occur on the main Mill parcel, such as processing facilities, material storage, and product warehousing. These are currently still in operation for manufacturing. Idle structures to be removed by this project within the project footprint are described above.

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

Structures to be removed include:

- A warehouse;
- Five docks/piers;
- Conveyor housings;

- An aboveground oil storage tank;
- Crane foundation; and
- Approximately 3,000 pilings that are associated with the above structures, serve as mooring dolphins, or are abandoned.

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

The main Mill parcel and Lady Island are zoned as Heavy Industrial land use. Areas of the project that are located in-water are zoned as Tidelands/Water.

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

The Camas 2035 comprehensive plan designation for the site is Heavy Industrial (City of Camas, 2016)<sup>3</sup>.

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

The project site is within the following Shorelines Master Program designations:

- *High Intensity* along the main Mill parcel and central portion of Lady Island along the Camas Slough.
- *Medium Intensity* in the along the Columbia River and southeast corner of Lady Island.

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

Critical areas in the project include the Columbia River and the Camas Slough along with limited areas riverine wetland areas along the riverbanks. Portions of the project are within the Columbia River floodplain.

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

No people will work in the project footprint following completion. Ongoing Mill operations would continue on the main Mill parcel and Lady Island. The Mill currently employs approximately 150 people, and this number of employees would remain unaffected by the completion of the project.

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

No one will be displaced by this project.

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

Not applicable as no displacements would occur.

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

The project area would remain as an operational mill and zoned as heavy industrial following demolition, which would retain the available employment lands that are essential to a healthy city (Camas City-wide Land Use Goal LU-1.1).

<sup>&</sup>lt;sup>3</sup>. Reference: City of Camas. Camas 2035; a Comprehensive Plan to Guide Growth and Development for the City of Camas. Ordinance 16-010. June 2016.

Demolition of unused structures is compatible with existing City requirements for maintenance of buildings and structures. Safe and timely demolition of unused structures provides environmental protection and public safety and is compatible with the City of Camas 2035 comprehensive plan's vision for vital, stable, and livable neighborhoods (City of Camas 2016).

The project, in part, fronts on the Camas Slough, which is a designated as an important shoreline for public recreation. Thus, the demolition project will help maintain attractive and welcome corridors to the City (Economic Development goal ED-6).

As a result of the demolition project, a portion of the riverbank shoreline will be regraded to preserve the natural contours and aquatic habitats will be restored due to the removal of obstructions (Natural Environment Goal NE-1.8, NE-2.2).

Additionally, the project plans to restore a portion of the shoreline that has been impaired or degraded, which align with the Camas Shoreline Master Program (Natural Environment Goal SMP-3.3).

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

No measures are proposed as there are no agricultural or forest lands of long-term commercial significance present.

#### 9. Housing

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

Not applicable. No housing is on-site or planned for this site.

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

Not applicable. No housing units would be eliminated.

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

Not applicable. No impacts to housing would occur.

#### 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?

No new structures are proposed. The tallest structure to be removed is the 80 foot high crane on the PECO Dock. No new structures are proposed for the parcel, so no exterior building materials are proposed.

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

No views will be obstructed by the removal of structures.

Alterations in the view of the riverbank on the main Mill parcel will result from the removal of structures. When viewed from the Camas Slough, Lady Island, and from viewable sections along SR 14, the riverbank would no longer contain the existing infrastructure and would be less cluttered. However, this is

a minor change as the remaining operational portions of the Mill, with the balance of infrastructure would continue to comprise the view.

<u>Views from the Project Site:</u> The main Mill parcel is on the southern shoreline of the City of Camas and Local views from the main Mill parcel riverbank currently include the nearby Mill infrastructure and Lady Island's wastewater treatment plant, the Camas Slough, and State Route 14. The regional visual character from the parcel will remain largely the same following the project.

<u>Views towards the main Mill parcel</u>: Few public locations are available to view the main Mill parcel's riverbank. Current views from adjacent public space are limited to those from on the Camas Slough and Columbia River. Following demolition, this view will no longer include the obstructions of the piers/docks, pilings, warehouse, crane foundation, oil tank, dolphins, or pilings. However, most of the mill's infrastructure would remain, so the industrial characteristics of the viewshed would be retained following completion of the project. The overall degree of visual change would be low, although the riverbank will be visually less cluttered.

<u>Views along the River and Camas Slough:</u> Viewers in this area include recreational boaters and from three residential properties. Viewers from residential properties would be considered highly sensitive to deterioration of any visual character. The visual character is strongly defined by the open view corridor along the river and its generally forested riverbanks. The removal of dolphins from multiple locations along the Camas Slough and the River in most cases would completely remove the visible industrial elements from the viewshed. For most viewers, the removal of the dolphins would be considered positive as it restores harmony to the natural scenic character.

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

Vegetation will be retained where possible throughout the project area.

#### 11. Light and Glare

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

No new permanent source of light or glare would be produced as a result of this project. The project will be conducted during daylight hours. No nighttime work is planned.

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

No light or glare would result from the completed demolition project. No new light sources are planned.

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

No existing off-site sources of light or glare could affect this proposal.

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

If artificial lighting is necessary during demolition, it will be temporary and localized for the crew during demolition. Lights will be directed away from the nearby water sources to minimize temporary impacts on aquatic wildlife. No permanent impacts from light or glare would result from the project.

#### 12. Recreation

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

Informal recreational opportunities in the immediate vicinity include recreational boating, fishing and other river-focused activities. No recreational opportunities exist on the main Mill parcel or Lady Island. Walking and biking on the nearby City streets and the adjacent City neighborhoods is also available.

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

No permanent changes to recreation activities will result from the project. There could be some temporary displacement of existing water-related recreational opportunities primarily within Camas Slough during the removal of numerous structures. Work is not proposed to impact water-related recreational opportunities on the mainstem channel of the Columbia River.

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

No changes to recreation activities result from this demolition project.

#### 13. Historic and cultural preservation

## 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.

Three structures to be demolished were determined to be older than 50 years (**Table 6**). The three resources were assessed for their eligibility for National Register of Historic Places listing, both individually and as contributing resources to a potential historic district. These resources, while more than 50 years of age, individually fail to meet any NRHP criteria due to a lack of architectural significance and material integrity; however, the three historic resources, as a group, represent a significant association with broad patterns of local history under Criterion A of the NRHP, related to the development of the Camas Mill and its close relationship with the development of the City of Camas. Under NRHP Criterion C, these resources, as a group, demonstrate the physical design of a pulp and paper industry as it developed throughout the 20th century, reflected in their architecture, landscape, and engineering aspects. For most of the City of Camas's existence, the production of pulp and paper has dominated the local economy and facilitated the development of supporting industries within the region. Therefore, these resources warrant consideration for eligibility as contributing resources to a proposed historic district.

<b>Building/</b> Facility	Construction			<b>Determination of</b>
Number	Date	<b>Building/Facility Name</b>	NRHP Recommendation	Effect
1201-1202	1932	Dock Warehouse	Not individually eligible; eligible as	Adverse Effect
			contributing resource to a potential	
			historic district	
	c. 1932	Dock Warehouse	Not individually eligible; eligible as	Adverse Effect
		Truck Dock	contributing resource to a potential	
			historic district	
6108	1934	Loading Ramp	Not individually eligible; eligible as	Adverse Effect
		(to the Dock Warehouse)	contributing resource to a potential	
			historic district	

#### Table 6: NRHP Recommendations and Determinations of Effect for Historic Resources

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 previously recorded sites were identified within the Mill parcel. Studies to determine this and which were completed for this project include:

- Appendix 4: Inventory of Historic Properties and Historic Context Study: Prepared by WSP USA Environment & Infrastructure Inc.; Portland, OR, February 2023.
- Appendix 5: Archaeological Resources Survey and Literature Review: Prepared by WSP USA Environment & Infrastructure Inc.; Portland, OR, March 2023.
- Appendix 6: *Inadvertent Discovery Plan:* Prepared by Erik Anderson; Kirkland, WA, February 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.

- <u>Inventory of Historic Resources:</u> The study methodology followed NRHP recommendations including those in Bulletin number 15, *How to Apply the National Register Criteria for Evaluation* (United States Department of the Interior 1997) in assessing buildings over 50 years of age for NRHP significance and eligibility. To construct an understanding of the historic land use, research was conducted at several archival repositories to review historic maps, aerial photographs, property records, city atlases, census and manufacturing records, GIS databases, and other pertinent information. Research included Washington Department of Archaeology and Historic Preservation (DAHP) and University of Washington archives, as well as historical records held by GP and various local Historic Societies. Impacts were assessed according to the NRHP, where demolition of potentially eligible resources is considered an Adverse Effect. Considering that together the three structures identified are recommended to have eligibility as contributing resources to a potential historic district, the demolition of these three resources will have an Adverse Effect (**Appendix 4**).
- <u>Archaeological Resources Cultural Survey and Literature Review:</u> The study methodology followed standards established by the DAHP and provided in *Washington State Standards for Cultural Resources Reporting* (DAHP 2018). Work included field investigations, as well as review of ethnographic and historical literature on Native American and early Euro-American occupation of the Project Area and its vicinity, map regression analysis, and a literature review including historic maps, and records on file with the DAHP. Based on archaeologic survey results, it was determined that it would be unlikely that intact archaeological material would be disturbed by the project **Appendix 5**).

An Inadvertent Discovery Plan has been developed and will be implemented during demolition (Appendix 6).

## 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.

Adverse effects are unavoidable to the three historic structures slated for demolition. Mitigation efforts include digital and written documentation of the structures prior to demolition and development of a detailed Historic Context for the properties. Also, the Camas Mill actively maintains a historic archive in Camas with arranged public access.

Mitigation for archaeological resources requires contractors and other personnel be briefed on the provisions of the Monitoring and Inadvertent Discovery Plan to clarify their responsibilities prior to any demolition activities, and the requirements of the plan be implemented during demolition.

#### 14. Transportation

## 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.

Access to the project area located along the south shore of the Camas Slough is provided by NE Adams Street and NE 3rd Street in the City of Camas. If needed, access to areas of the project located on Lady Island is accessed with coordination with GP from the Lewis and Clark Highway (also known as State Route 14). There is no public access to Lady Island. City streets and State Route 14 will be used to transport workers, equipment, supplies, and waste materials. Nearest access to the Columbia River is at the Port of Camas/Washougal, 1.5 miles upriver from the project area.

## **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?

All project activities will occur on GP property or adjacent, and in-water of the Columbia River or the Camas Slough. The river is not currently served by public transit. Clark County provides public transit (C-Tran) along NW 6th Avenue in the vicinity of the main Mill parcel. The nearest bus stop (C-Tran, Clark County) is along NW 6th Avenue, approximately 0.15 mile north of the main Mill parcel.

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

The project would neither create nor eliminate any 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).

No new streets or roads are required because of this project.

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

The project will occur in the immediate vicinity of rail transportation that lies on the main Mill parcel and along the Columbia River. The project would not use rail transportation. The project will not use air transportation.

The project activities will utilize vessels on the Columbia River and Camas Slough for piling, dolphin, and pier/dock removals. Additionally, vessels will be used for dredging, support, and for transport to offloading areas. Vessels would include tugboats, barges, and support vessels.

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 not generate any daily vehicular trips once completed.

During demolition, approximately three to five truckloads of debris are expected to occur each day during demolition activities to remove the debris from the project site. Additionally, prior to the start and at the end of demolition, demolition equipment would be hauled to the site and then removed from the site. It is unknown what percentage of the volume would be trucks, we estimate that the majority would be trucks

and demolition equipment. Daily vehicular trips would be timed to occur outside of peak traffic times in this area. Note that infrastructure, both within the mill and the surrounding community, was designed to accommodate a much larger volume of truck traffic, therefore, there will be limited impacts during demolition activities.

## 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.

The project will not interfere, affect, or be affected by movement of agricultural and forest products on roads or streets.

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

<u>Traffic Control</u>: To reduce risk of any potential traffic and safety impacts, traffic control will be used to control access to and from the project site during the demolition. Traffic control would include flaggers where required, as well as safety signage for traffic and pedestrians, and will follow all City requirements.

#### 15. Public Services

## 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 change in public services results from the project.

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

None required, as no change in public services is anticipated from the project.

#### 16. Utilities

#### a. Circle utilities currently available at the site:



### 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 new utilities are proposed for this project and all required utilities during removals will be provided from existing facilities.

SEPA Checklist In-water and Overwater Structures Removal Project Camas Mill, Camas, WA

#### C. Signature

Under the penalty of perjury, 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: Shup 1 Wood
Name of signee SHAWN T. WOOD
Position and Agency/Organization
Date Submitted: <u>7/26/2023</u>