CITY OF SUMAS

SEPA ENVIRONMENTAL CHECKLIST [WAC 197-11-960]

A. BACKGROUND

1. Name of proposed project, if applicable:

Nation Clean Trans-loading project

2. Name of applicant:

Nation Clean Energy

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

Mr. Dennis Wilson, Executive Director, 902-935 Marine Dr. West Vancouver, British Columbia V7T 1A7 (604) 999-9142

4. Date checklist prepared: Original prepared:

September 15, 2025

5. Agency requesting checklist:

City of Sumas, WA (City)

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

Project Background

Nation Clean Energy is proposing to operate a petroleum products and petroleum by-products trans-loader at the site owned by Sumas Developments, LLC (SDL) and on the site owned by Pacific Rim Reload LLC. This activity would transfer petroleum and petroleum by-products from rail cars to transport trucks.

The SDL parcel is a 48.75-acre property, located east of Barbo Road, west of Bob Mitchell Avenue, and north of the Burlington Northern Railroad (BNRR). The Pacific Rim property is a 4.88-acre parcel located to the east of SDL site. The project capitalizes on the presence of the existing railroad, connections to the existing Heavy Haul road on Bob Mitchell Avenue, siting within lands zoned for industrial development within Sumas, and adequate land for the facilities.

The 48.75-acre SDL property was the subject of a previously approved SEPA Checklist in May of 2016 for the NGL Supply Company of Denver Colorado to operate a propane rail car to truck trans-loader. This operation is in existence today and successfully trans-loading.

The Nation Clean Energy trans-loader is not affiliated with any of the other trans-load operators on the SDL or the Pacific Rim property. The Nation Clean Energy trans-load unit is built specifically to

handle the transfer of low-pressure petroleum products and can service northern Washington state and the lower mainland of British Columbia.

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

Yes. The project is anticipated to start small during ramp up, however paced growth would see increased activity at the trans-load site.

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

Nothing prepared for this project.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

There are no other known applications pending for the property.

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

The following permits are being sought for the Nation Clean Energy trans-load project:

- SEPA Checklist
- Conditional Use Permit City of Sumas
- Industrial Stormwater General Permit (ISGP) Washington State Dept of Ecology (WSDOT)
- IRS Fuel tax Permit
- City of Sumas business license

11. Give a brief but 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.)

Nation Clean Energy is proposing to operate a petroleum products and petroleum by-products trans-loader at the site owned by Sumas Developments, LLC (SDL) and on the site owned by Pacific Rim Reload LLC. This activity would transfer petroleum and petroleum by-products from rail cars to transport trucks. Currently the SDL and the Pacific Rim Reload sites are used for trans-loading propane from railcar to truck and solid waste from truck to rail car. This proposal would be an additional non-affiliated trans-load operation. The first site is 48.75 acres located at 309 Bob Mitchell Ave., and the second site is 4.88-acres located at 311 Bob Mitchell Ave. in Sumas Washington.

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 4 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 first property is 48.75-acres and owned by SDL located at 309 Bob Mitchell Ave. and the second parcel is 4.88-acres owned by Pacific Rim Reload at 311 Bob Mitchell Ave. in Sumas, Washington, east of Barbo Road, west of Bob Mitchell Avenue, and north of the BNRR railroad (Township 41N, Range 04E, Section 34). The project site's zoning designation is Industrial, which is consistent with the site's designation within the City of Sumas Comprehensive Plan.

The 309 Bob Mitchell Ave. site is situated in the NE ¼ of the SW ¼ of Section 34, Township 41 North, Range 04 East of W.M. and is identified under Whatcom County Assessor's tax parcel number 410434110168-0000.

The 311 Bob Mitchell Ave. Site is situated in the NW ¼ of the SE ¼ of Section 34, Township 41 North, Range 04 East of W.M. and is identified under Whatcom County Assessor's tax parcel number 410434355207-0000.

See appendix D for the site map

B. ENVIRONMENTAL ELEMENTS

1. Earth

a. General description of the site (circle one):

Flat, rolling, hilly, steep slopes, mountainous, other

The 48.75-acre SDL Binding Site Plan area, along with the 29-acre mitigation site, was originally part of the William Systma dairy farm from the 1950s to the late 1990s. The property is generally flat with slopes between 1 and 3%. The elevations and slopes on the 4.88-acre Pacific Rim site are the same as the SDL property.

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

The SDL property is generally flat, sloping slightly to the north with elevations of 42 to 44 feet above sea level. The Pacific Rim property is slightly higher with elevations nearing 53

feet at the east end of the property and closer to 49 feet at the west end. This information was collected from the Sumas interactive topographical map. The average slope on the site is 1% with the steepest slopes being approximately 3%.

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

No soil will be removed to operate this trans-load project. Information regarding the soils on the project site has been obtained from the National Cooperative Soil Survey, Web Soil Survey, Whatcom County Area, Washington (USDA Natural Resources Conservation Service (NRCS). The NRCS web soil survey indicates soils on the proposed SDL Reload Facility site consist primarily of Sumas silt loam, drained, 0 to 2 percent slope (Map Unit 162), with a small area of Puget silt loam, drained, 0 to 2 percent slopes (Map Unit 123) in the southwest corner of the site. Sumas silt loam and Puget silt loam are both very deep, poorly drained soils formed in recent alluvium. NRCS lists the on-site soils as hydric, and as prime farmland soils when drained. The soils on-site were once drained to allow agricultural production.

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

No, the Whatcom County Critical Areas Ordinance (CAO) Geologically Hazardous Areas Map (February 2006) GIS (Geographic Information Services) date stamped 2016 does not indicate the presence of unstable soils in the project vicinity. The County CAO Geologically Hazardous Areas Map showed the site is located within a "moderate to 5 high" risk area for seismic hazards liquefaction susceptibility, a "D-E" rating for potential for enhanced ground shaking; and within a Case 1 debris flow region for volcanic hazards (WDNR 2004).

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

No filling or grading proposed due to this project.

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

N/A as there is no required ground disturbance in this project.

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

There is no construction proposed as part of this application. The existing SDL site's current state is gravel. The Pacific Rim site is currently asphalt.

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

None, as there will be no earth impacts as result of this project. All new activity being applied for within this Conditional Use Permit will be on existing surfaces.

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.

The project will not result in emissions during petroleum transfer operations that exceed applicable standards or substantially affect ambient air quality. This project will only add 5-10 trucks per day to the area and the associated truck emissions. The trucks accessing this facility are late model diesel transport trucks and are maintained per the vehicle manufacturer's specifications or greater. The trans-load unit itself is vapor balanced, (or closed loop) designed to maintain zero emissions during product transfer. The trans-loader runs on a self-contained diesel generator that will be shut off when not trans-loading product.

See Appendix "A"

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

No, there are no off-site sources of emissions or odor that would affect the proposed Nation Clean Energy trans-loader project.

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

Diesel generator to be shut off when not transferring product.

To avoid effects on ambient air quality, the trans-loader is designed as a closed loop bottom loading system which captures the vapors during product transfer and directs them from the trucks being loaded to the emptying rail cars.

Connections used to connect the rail cars to the transport trucks are industry standard cam lock types of tight fill couplers and are designed to be tight, which reduces vapors during the transfer process.

Appendix A Vapor Balancing diagram

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 the type and provide names. If es. If appropriate, state what stream or river it flows into.**

The SDL site and the Pacific Rim sites lie within the Sumas Creek watershed, which includes land tributary from British Columbia to the north and the area between Sumas Creek and Johnson Creek to the south. The property did have several small wetlands on it, and these were filled in 2013 under a Clean Water Act (CWA) permit from the US Army Corps of Engineers (USACE), issued in October 2012. Mitigation for the wetland fill was accomplished at the SDL Mitigation site, located immediately north of the project site along Kneuman Road.

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

Measurements show the closest property boundary as being 70' from the nearest bank of Johnson Creek, which runs parallel to the Pacific Rim property along the south edge of Kneuman Rd. If the project is located on the eastern end of the Pacific Rim property, the estimated distance to Johnson creek would be approximately 190'. If the SDL property is used the distance to the same water is over 300". There will be no overwater work. See Appendix map F.

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

There will be no ground disturbance as a result of this project.

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

No, this project will not require surface water withdrawals or diversions.

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

Yes, see the site plan in Appendix B. Based on computer modeling of flood elevation changes due to development, the City's FEMA approved Flood Damage Prevention Ordinance designates particular flood-prone areas in which specific development constraints apply. The Flood Insurance Rate Map (FEMA 2004) designates most of the site within the 100-year floodplain, with a small (500-foot wide) strip, in the southwest corner of the property, encompassing the BNRR rail that is elevated above the 100-year flood elevation (Figure 4). The 100-year flood elevation in the area is about 45 feet above sea level.

Most of the SDL site is approximately 42-44 feet above sea level. The Pacific Rim site is 49-53 feet above sea level. The project site does not lie within a City-designated Flood Risk Zone or Flood Corridor.

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.**

None.

b. Ground:

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 a general description, purpose, and approximate quantities if known.**

None.

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

None.

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.**

This proposed project will not alter the drainage systems currently on the site. Natural precipitation is the source of storm water runoff on the site. The grade of the site has been developed to move storm water to the north end of the property into storm water ponds which then flows into bioswales along the north of the property. This northern area of the property is undeveloped. This water does not seem to enter any other waters in the area.

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

No waste material will be discharged to groundwater because of this trans-load project. There is no waste material being generated throughout the life of this project.

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

No, the project will not alter drainage patterns or systems inside or outside of the project limits.

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

No new control measures planned. The existing storm water management facilities to treat all storm water generated at the site have been developed and are in use, per property owner reports. The storm water facilities are the subject of a storm water plan and drainage report that was designed and updated in 2011 in accordance with the 2005 WDOE SWMM.

The facilities include a storm water collection system, treatment ponds, biofiltration swales and conveyance features.

Operating procedures will be in place to ensure that all trans-loading is completed in an environmentally sound manner. Emphasis will be placed on controlling any potential spills before they happen so as to protect the environment.

Training programs will be provided to staff to ensure that proactive measures are taken to avoid spills but also to effectively deal with any small spills that do occur. This training includes the correct reporting processes for any spills in the State of Washington.

Nation Clean Energy will develop an emergency response plan for the trans-load operations and train all staff on the plan to ensure a timely and consistent approach to dealing with any unforeseen events. Nation Clean Energy top 3 priorities during an event are to protect human life, protect the environment and protection of all assets (regardless of ownership).

Spill kits, absorbent materials and fire extinguishers will be stocked on site to deal with any unforeseen issues that should arise.

Spill pans will be used under all connections during the entire process of connecting, transferring and disconnecting of equipment. When spill pans are not in use they will be stored in a way that rainwater cannot enter them and overfill causing residual product to spill out onto the site.

All on-site equipment and the transport trucks that come to site will be subject to rigorous maintenance practices which meet or exceed the manufacturer's specifications.

4. Plants

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

___x___deciduous tree: alder, maple, aspen, other

_____ evergreen tree: fir, cedar, pine, other

_____ shrubs

___x___ grass

___x___ pasture

_____ crop or grain

_____ orchards, vineyards, or other permanent crops

_____ wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other

_____ water plants: water lily, eelgrass, milfoil, other

_____ other types of vegetation

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

None as a result of the Nation Clean Energy trans-load project.

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

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

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

None proposed as part of this project

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

None known

5. Animals

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

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

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

The SDL industrial site does not have any documented presence of listed species on or near the property. Based on the absence of documented listed species at the project site and the distance from Sumas Creek, the proposed Nation Clean Energy Trans-load project will not impact threatened or endangered species.

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

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

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

None as a result of this project.

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

None known

6. Energy and natural resources

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

The Nation Clean Energy Trans-load project will rely upon a self-contained diesel generator for energy sources on-site. The vehicles, operating equipment, transportation trucks and rail will also rely upon fossil fuels.

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

No, the project would not affect adjacent property solar usage.

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

There is limited opportunity, however, not allowing the idling of equipment for extended periods will be implemented as practical. This will support energy conservation as well as reduce emissions and noise.

7. Environmental health

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

The likelihood is low that any environmental health hazards would occur as a result of this Nation Clean Energy Trans-load project. The operations will identify procedures that would avoid and minimize any spills, fires or explosions. The operator will perform routine daily equipment inspections, have spill kits and fire extinguishers on site in case of petroleum products spills, ensure that staff are trained in the use of such equipment and follow strict reporting protocols.

Will follow SPCC protocols for training, procedure development and reporting spills.

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

No contamination issues in present state and nothing found from past uses.

The Department of Ecology website housing the Facility/Site database lists properties that are subject to state cleanup, Federal superfund cleanup sites, hazardous waste generators, solid waste facilities, underground storage tanks, dairies or sites with

enforcement actions. These properties are permitted to switching and terminal services, local trucking without storage, freight transportation and railroad property lessors and does not appear to have any current cleanup orders or activity assigned to it.

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.**

   There are no hazardous conditions or chemicals that would affect this project. Available data shows the nearest underground pipeline is a natural gas line operated by Northwest Pipeline and it appears to cross under the city 1.9 miles east of the project site.

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

   The only product stored on site in small quantity would diesel fuel for the trans-loader self-contained generator. The maximum volume stored would be 500 gallons. This fuel would be stored in a double walled approved storage tank.

4. **Describe special emergency services that might be required.**

   Aside from standard police, fire, and rescue services that already serve the area, there is not an anticipated need for any special emergency services for the project.

5. **Proposed measures to reduce or control environmental health hazards, if any.**

   All Occupational Safety and Health Administration (OSHA) and WDOE standards regarding environmental and human health will be met during the operation of the Nation Clean Energy trans-loader. The project will comply with current local, state, and federal regulations for worker safety. Transport trucks are inspected daily to ensure there are no leaks of hydraulic fluids, fuel, lubricants, coolants or other petroleum products. Management of any contaminated media (a rare circumstance) will be in accordance with applicable environmental regulations.

b. Noise

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

   Existing noise levels produced in area are generally limited to traffic and neighboring Industrial usage to the south and southeast of the site, none will affect this proposal. The surrounding lands are dominated by industrial and agricultural uses.

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

During the open hours in which Nation Clean energy would operate the trans-loader there would be some noise associated with rail traffic, truck traffic and the noise of the trans-loader itself. The noise should not exceed the levels that exist today as there is current propane trans-loading taking place on site. The proposed hours of operation are 7:00 am through 6:00 pm Monday through Friday and occasionally 8:00 am through 4:00 pm Saturdays.

3) **Proposed measures to reduce or control noise impacts, if any:**
   1. Noise effects are mitigated as operations would be conducted during working hours of 7:00 am to 6:00 pm on Monday through Friday and occasionally from 8:00 am through 4:00 pm on Saturdays.
   2. All trucks shall be maintained in good working condition.
   3. The project will adhere to local noise ordinances as required for Industrial zoned sites within the City of Sumas.
   4. All staff will be trained on control of unnecessary noise which aligns with industry best practices and fosters a good neighbor mindset.

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 will not affect current land uses on nearby or adjacent properties. The SDL industrial site and the Pacific Rim sites are zoned for industrial use. The sites are currently used as a heavy use intermodal primarily for trans-loading various products such as propane gas from rail to truck, logs and solid waste. The adjacent properties to the south and east are in industrial use. The property immediately to the west is in agricultural use and the property immediately to the north is the SDL wetland mitigation site.

b. Has the 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 because 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?

Yes, however not recently. It is understood that the SDL industrial site was used for agriculture (feed corn and pasture) from the 1950s until the mid-late 1990s. There will be no loss of agricultural or forest land as a result of this project.

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?

No, the project area is not within zoned agricultural land and no working farmlands or working forest lands are present.

c. Describe any structures on the site.

There are no existing structures on the SDL industrial site property. There is one office building on the Pacific Rim site.

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

No.

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

The project site is zoned Industrial.

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

The project site's zoning designation is Industrial, which is consistent with the site's designation within the City of Sumas Comprehensive Plan. Therefore, the site is subject to the zoning regulations established in Chapter 20.44 of the Sumas Municipal Code (SMC).

The project is identified as being permitted as a conditional use in the Industrial District under Section 20.44.030(1) - An operation "using significant quantities of the following materials and/or the following processes," where the list of materials and processes includes "petroleum products and petroleum by-products."

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

The City of Sumas Shoreline Environments Map designates the SDL industrial site as being situated within the 100-year floodplain. Appendix B shows the most recent GIS map view printed Sept 30, 2025.

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

No area has been designated by the City of Sumas as a 'Critical Area' is present on the SDL industrial site. Both the SDL and Pacific Rim industrial sites are located in an area designated within the 100-year floodplain regulated under the City's Flood Damage Prevention Ordinance.

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

No people will reside at the site and there is an anticipated staff of 1. There will be long-term employment opportunities. How many people will work at the future facilities is unknown at this time.

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

None.

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

No displacements of people as a result of this project.

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

The project will comply with the City of Sumas Comprehensive Plan, Zoning Ordinance, Flood Damage Prevention Ordinance, Shoreline Master Program, and any permit conditions from the SEPA findings.

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

None, as no future impacts are identified.

9. Housing

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

None.

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

None.

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

None.

10. Aesthetics

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

There will be no buildings constructed for the Nation Clean Energy trans-load project. The trans-load structure is approximately the height of a DOT-111 rail car at 15'6". The Nation Clean Energy trans-loader is approximately the same height as the existing trans-loader on site operated by the NGL Supply Company.

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

There will be no alterations or obstructions of views beyond existing conditions.

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

None. The project will not result in the destruction, loss or damage to any natural, scenic or historic features. There are currently no natural or scenic features on this Industrial site.

11. Light and glare

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

There will be no additional lighting or changes to existing light or glare as a result of this project. Some lighting would occur but only as needed and during normal operating hours.

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

No, as there is no additional lighting required for this project.

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

None.

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

Existing lighting on site will be used and only as required, no new control measures are planned.

12. Recreation

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

Local recreational opportunities presently available the City of Sumas include:

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

3) Sumas is just one hour north of Mount Baker recreational ski area that has skiing, snowboarding, hiking, and other recreational opportunities.

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

No displacement of any recreational activities.

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

None

13. Historic and cultural preservation

a. Are there any 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.

None known or found.

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.

None found or identified. Cultural resource reports filed with DAHP in association with previous ventures in the vicinity of the currently proposed project do not indicate the likely presence of significant cultural resources in the area. This project is not expected to affect historic properties or archaeological sites.

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.

None as there will be no digging associated with this project.

While it is considered highly unlikely that the proposed project, to operate a trans-loader, would affect significant cultural resources, should an inadvertent discovery of archaeological materials (e.g. shell midden, faunal remains, stone tools, etc.) or human remains occur, all work in the immediate vicinity shall stop immediately and the area shall be secured. The project lead and/or property owner shall contact the SHPO office and may

also contact an archeological consulting firm immediately to assess the situation and determine the necessary actions to take to preserve all protected cultural resources.

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.

None, there is no digging or ground disturbance required for this project

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.

The SDL industrial site and the Pacific Rim industrial site will be served by Bob Mitchell Avenue, a Heavy Haul route to the east and Grainger Way, the internal Heavy Haul Road that was constructed and connects to Bob Mitchell Avenue. The BNRR is located along the southern border and will provide transport of commodities, recyclables, rail ballast, and solid waste for shipping.

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

The immediate area adjacent to the project site is not served by public transit. However, the Whatcom Transportation Authority (WTA) serves downtown Sumas via Route 71X "Bellingham Express". This bus stop is approximately 0.5 miles away in downtown Sumas.

c. 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).

There will be no changes required to existing streets or roadways.

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

Yes, rail. BNSF railroad tracks run parallel to the site's southern property boundary. The existing track on the project site connects to the BNSF railroad line to facilitate rail use.

e. 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 non-passenger vehicles). What data or transportation models were used to make these estimates?

The project will not create excessive vehicular congestion on neighborhood, collector or residential access streets because it will be accessed from Bob Mitchell Avenue and will only generate approximately 5-10 additional truck loads per day. Traffic impacts will be minimal based on the anticipated amount of truck traffic generated. The majority of truck trips to and from the project site would occur during working hours of 7:00 am and 6:00 pm. The data used to estimate the increased truck traffic is based on the volume of product that will be railed to site for trans-loading.

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

No, given the low number of total trucks per day to enter and exit the site. The total is approximately 1 truck per hour at a peak of 10 trucks per day.

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

No proposed measures as traffic impact is expected to be insignificant.

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.

These services are currently provided, and the additional need is anticipated to be minimal.

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

None proposed

16. Utilities

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

Natural gas, water, telephone, and sanitary sewer are all available at the Pacific Rim and SDL industrial sites via connections with existing utilities on Bob Mitchell Avenue.

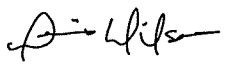
b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

Existing water, sanitary sewer and electricity are provided to the site by the City of Sumas. No changes are required for this project.

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:



Dennis Wilson

Date Original Signed: October 06, 2025

Appendix A

Vapor Balancing Diagram

Appendix B

GIS map showing 100-year flood plain in relation to the SDL property.

Appendix C

Overlay of Trans-loader application site on the 100-year flood plain map.

Appendix D

Potential Nation Clean Energy operating area on the SDL site.

Appendix E

Existing NGL Supply trans-load area.

Appendix F

Distance to nearest water map

Date Original Signed: October 06, 2025

Appendix A

Vapor Balancing Diagram

Appendix B

GIS map showing 100-year flood plain in relation to the SDL property.

Appendix C

Overlay of Trans-loader application site on the 100-year flood plain map.

Appendix D

Potential Nation Clean Energy operating area on the SDL site.

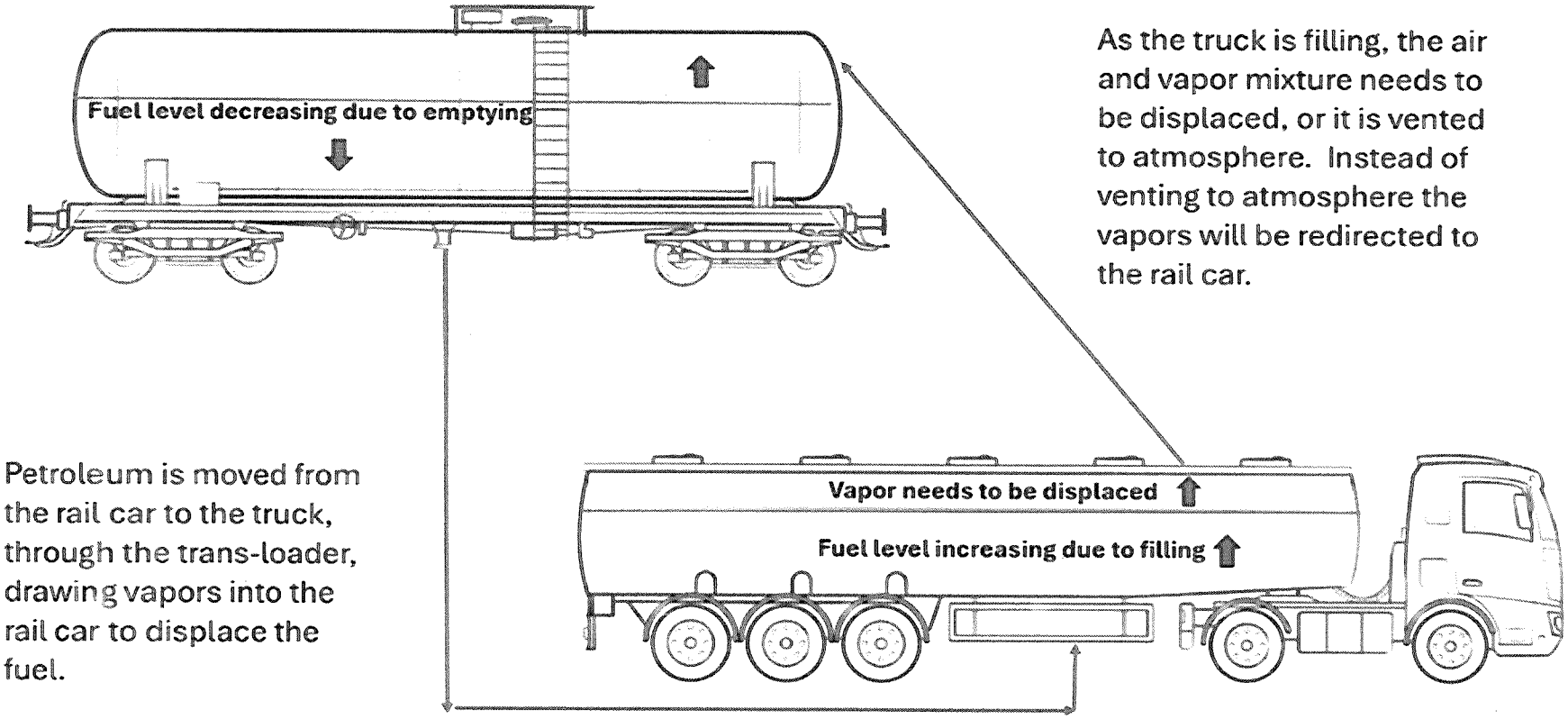
Appendix E

Existing NGL Supply trans-load area.

Appendix F

Distance to nearest water map

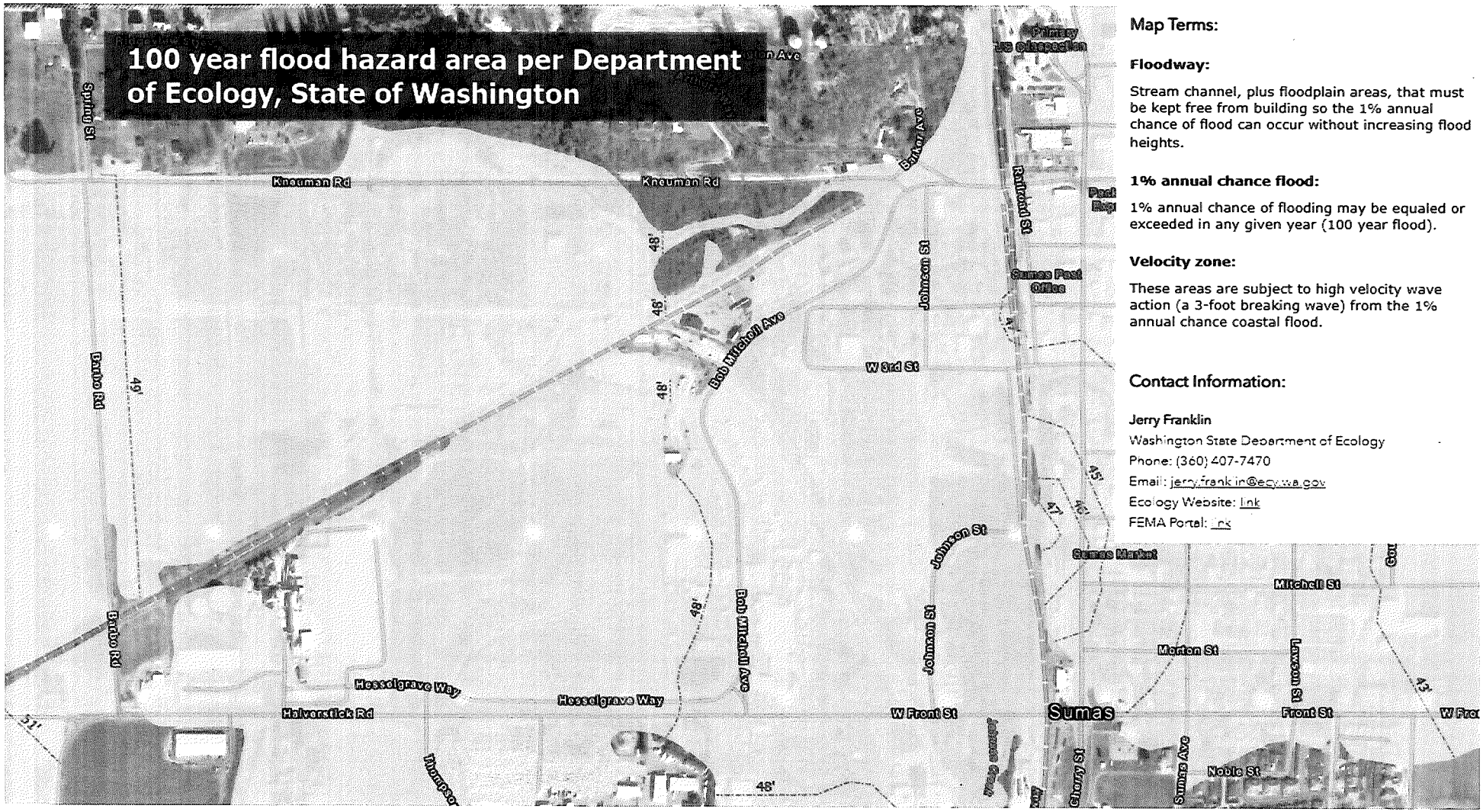
Appendix A



As the truck is filling, the air and vapor mixture needs to be displaced, or it is vented to atmosphere. Instead of venting to atmosphere the vapors will be redirected to the rail car.

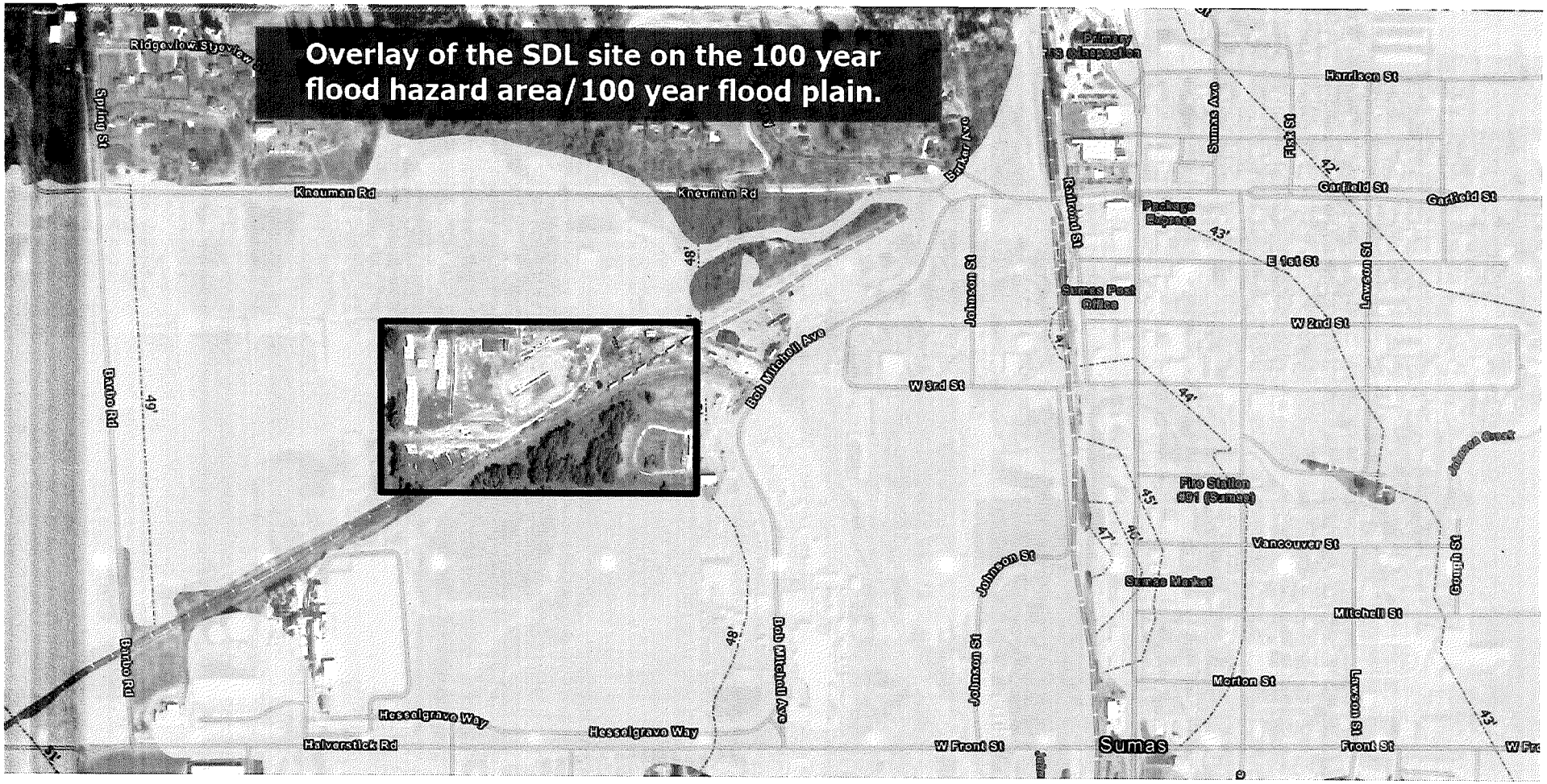
Petroleum is moved from the rail car to the truck, through the trans-loader, drawing vapors into the rail car to displace the fuel.

Appendix B



Most of the SDL property, including where the Nation Clean Energy trans-loading is proposed to operate, is within the 100-year flood plain as shown on this map. There is only a small portion along the south-western border of the site (where the BNSF tracks run alongside the SDL property) that is above the flood plain due to higher site elevations. This is the most recent map view (dated Sept 30, 2025) from GIS Dept of Ecology website.

Appendix C

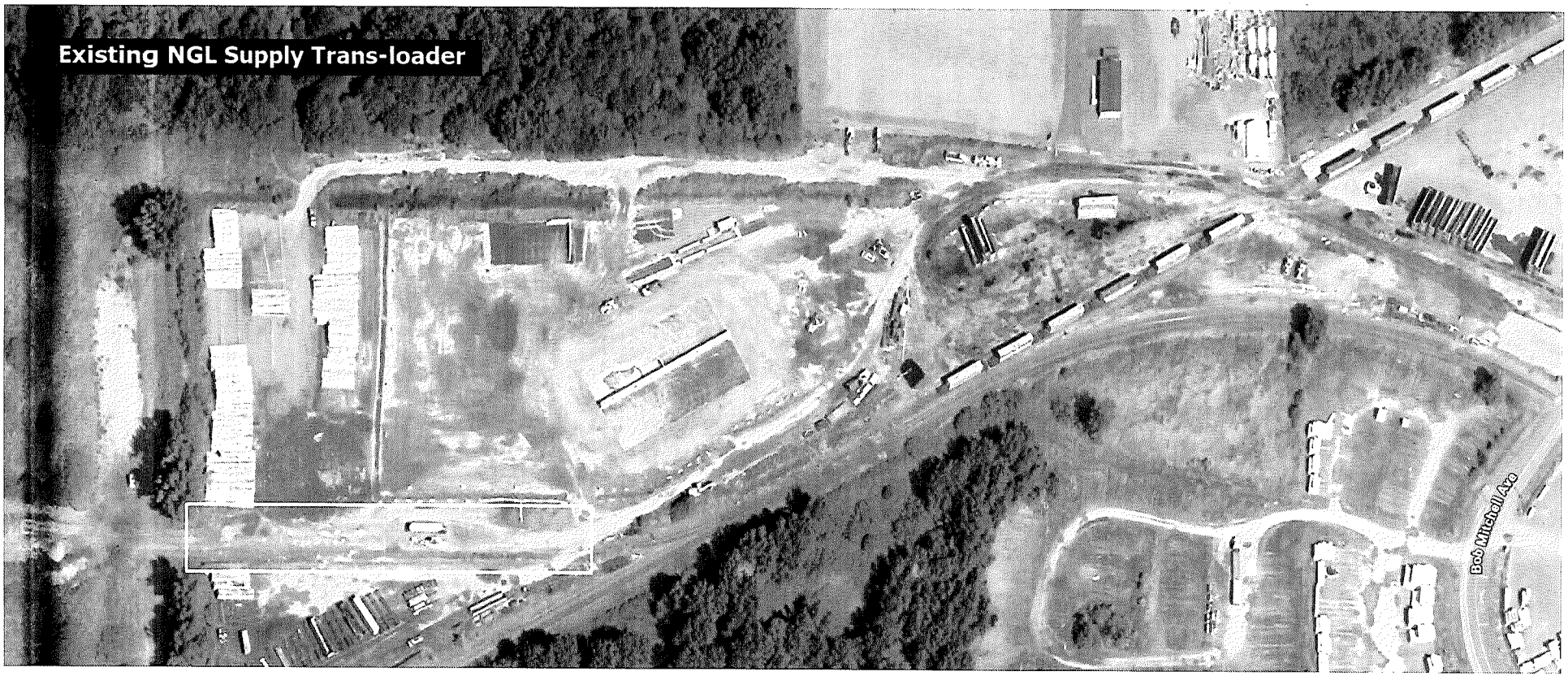


This map is an approximate overlay of where the Nation Clean Energy site trans-loading would take place. This is where the existing NGL Supply company trans-loader is located.

Appendix D

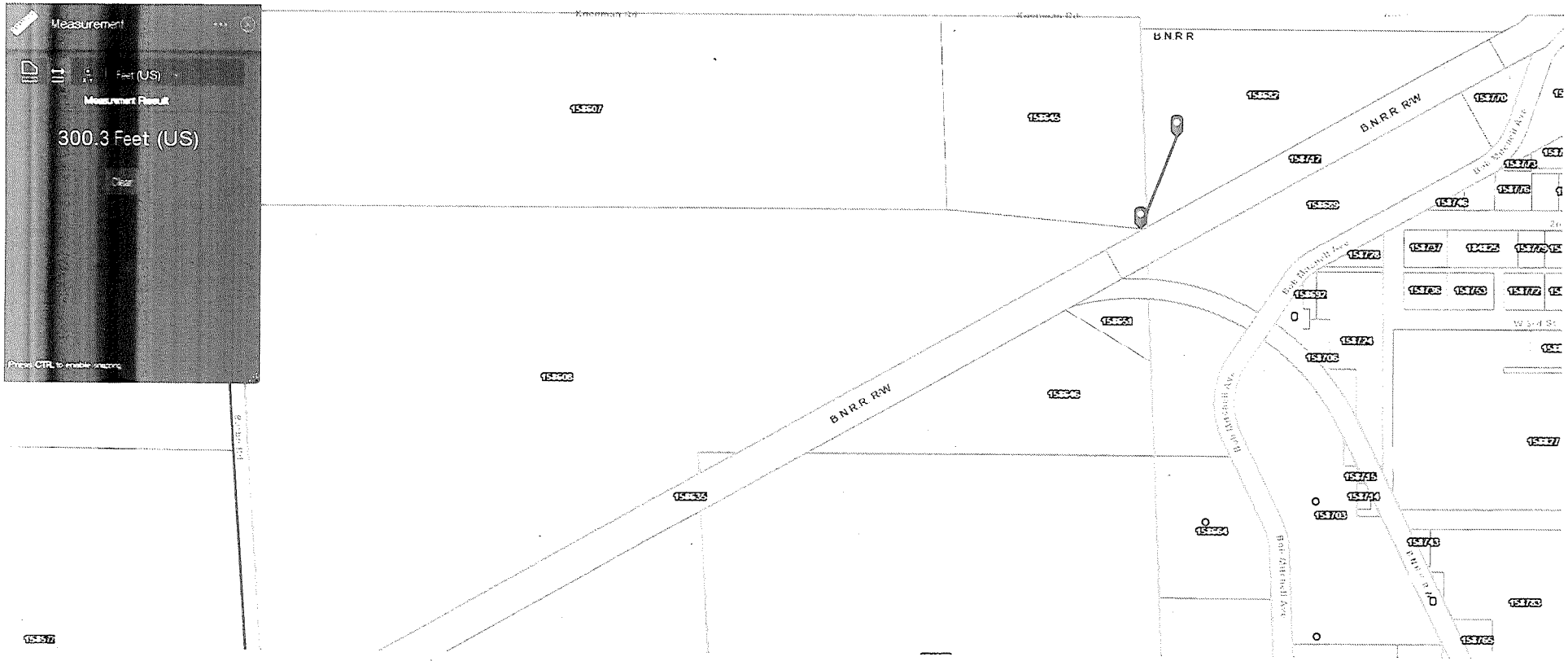
This map shows the location of where the proposed Nation Clean Energy trans-loading activities would take place.

Appendix E



Existing propane trans-loader location on SDL property.

Appendix F



Map shows that the distance to the nearest water in the area (Johnson Creek tributary) is 300.3 feet to the north. The SEPA checklist asks for all waters within 200 feet to be identified.