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SEP 29 2025

WAC 197-11-960 Environmental checklist.

CITY OF SUMAS

**State Environmental Policy Act (SEPA)
Environmental Checklist**

Purpose of checklist:

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

Instruction for applicants:

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

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

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

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

Use of checklist for nonproject proposals:

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

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

**The City of Sumas Council has established a non-refundable amount of \$250.00 for SEPA Environmental Checklist Review/ Threshold Determination.

A. Background

1. Name of proposed project, if applicable: ARROW SUMAS RELOAD FLAMMABLE COMMODITIES
2. Name of Application: ARROW SUMAS RELOAD
3. Address and phone number of application and contact person:
300 Bob Mitchell Ave, Sumas, WA 98295 USA
Brian Fraser, HSE Manager - (780) 994-3944
4. Date checklist prepared: 09/16/2025
5. Agency requesting checklist: City of Sumas
6. Proposed timing or schedule (including phasing, if applicable):
Early 2026: rail track upgrades and order transloading equipment
Spring 2026: new operations begin
7. Do you have any plans for future additions, expansions, or further activity related to or connected with this proposal? If yes, explain.

No
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

None
9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No
10. List any government approvals or permits that will be needed for your proposal, if known.

After approval from the City of Sumas, the following will be needed:
* Northwest Clean Air Agency (NWCAA) air permit registration
* Existing site Stormwater Pollution Prevention Plan (SWPPP) will be updated
* EPA ID number application will be prepared for flammables

11. Give a 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 answer on this page. (lead agencies may modify this form to include additional specific information on project description.)

Expanding services at the current site to include the transfer of bulk flammable commodities from rail cars to tanker trucks, or trucks to railcars

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.

Street address is 300 Bob Mitchell Ave, Sumas, WA 98295 in industrial park. Flammable transfer operations will be designated on the eastern most rail track on the property, away from lumber. Operations span about 800 ft of the track.

B. Environmental Elements

1. Earth

a. General description of site: Flat, rolling, steep slopes, mountainous, other _____

b. What is the steepest slope on the site (approximate percent slope)?
0-3% grade

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

According to City of Sumas Map2B, Soils and Steep Slopes, the site is located on Sumas silt loam, 0 to 3 percent slope. Soils are fine-silty over sandy or sandy skeletal (USDA National Cooperative Soil Survey).

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

No

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

Not applicable

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

Not applicable

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

No change to existing pavement

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

Not applicable

2. Air

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

New operation will see an increase in the number of vehicles on-site each day, estimated 3 trucks per railcar. Low likelihood of sulfide odor (<1% composition).

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

No

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

Minimize truck idling when stopped. To control odor, a closed loop transfer system will be used that includes a venting lid, vapor recovery unit, and scrubber. The scrubber acts as a filter removing sulfide.

3. Water

- a. Surface

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

Johnson Creek 600 ft east

Urban Conservancy Wetlands located northeast of property

2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters?

No

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.

Not applicable

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

No

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

Yes, the site is in an area of special flood hazard (City of Sumas, Map 4 Flood Zones). In the event of an imminent flood, operations would shut down. All valves will be closed and hand brakes set on railcars.

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

No

b. Ground

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

No

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.

Not applicable, no septic tanks

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.

Rain water follows the natural watercourses; storm water drain discharges to Johnson Creek

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

Yes in the case of an uncontrolled spill

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

Transfer equipment will use the Drylok dripless coupler system designed to safely transfer liquids. Buckets are placed under hose connections. Available spill response equipment are drain covers, spill kit, and spill containment tray. East perimeter will have a berm to minimize off site impacts.

4. Plants

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

- Deciduous tree: alder, maple, aspen, other
- Evergreen tree: fir, cedar, pine, other
- Shrubs
- Grass
- Pasture
- Crop or grain
- 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?

No vegetation will be removed or altered.

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

None known

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

No change

5. Animals

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

Birds: hawk, heron, eagle, songbirds, other: _____

Mammals: deer, bear, elk, beaver, other: _____

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

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

None known

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

Yes, Pacific Northwest Flyway Migration Route

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

Rail operations are located inside a fence area. Wildlife is generally not present.

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.

Transloading pump runs off diesel

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

No

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

The proposal does not include any energy conservation features.

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.

Yes, flammable materials pose a risk of fire.

1. Describe special emergency services that might be required.

Fire department in case of fire emergency.

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

Fire hazards are controlled by following standard operating procedures. The rail track is bonded and grounded to reduce the risk of static buildup. We use a sophisticated and purpose-built transloading gantry to safely transfer liquids. Arrow has a "No smoking" policy in the yard.

b. Noise

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

Forklift operations for handling lumber

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.

Noise associated with vehicular traffic and operating transfer pumps during normal daytime business hours.

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

Scheduled loads and proper planning; minimize idling and shut down equipment; maintain 5 mph speed limit on site

8. Land and shoreline use

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

Current use is lumber reload. South is Teal Jones (wood products company). West is Jazz Forest Products. North varies with housing and Pacific Rim Reload. East is Bulkhaul Development.

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

No

c. Describe any structures on the site.

Office and quonset hut

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

No

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

Industrial

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

Industrial

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

Not applicable

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

No

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

Project is expected to have 5 new hires, depending on volumes and products added.

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

None

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

Not applicable

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

The existing and projected land use will not change.

9. Housing

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

0

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

0

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

Not applicable

10. Aesthetics

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

Transloader gantry measures the height of a railcar, typically 15 ft.

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

Current views in the immediate vicinity would not be affected.

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

The project is surrounded by trees along the fenceline. No other measures are currently planned.

11. Light and glare

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

Current levels of light will not change.

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

No

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

None

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

None

12. Recreation

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

None within the immediate vicinity. Facility is located in an industrial park.

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

No

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

Not applicable

13. Historic and cultural preservation

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

No

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

None

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

Not applicable

14. Transportation

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

Bob Mitchell Ave / Garfield St
Halverstick Rd / W Front St

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

Not currently serviced by public transit. Nearest transit stops are 0.6 miles from Cherry St at Vancouver St Bus stop; and about 0.7 miles to Cherry St at 1st St Bus stop.

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

Not applicable

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

No

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

Yes rail, BNSF services line into site

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

1500 truckloads per year or about 5-7 trucks per day, during operating hours

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

Scheduled loading times; one way traffic flow on site

15. Public services

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

In case of emergency, fire department service

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

Facility has two fire hydrants along Bob Mitchell Ave. Transloaders will have fire extinguishers. Fire drills are conducted annually.

16. Utilities

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

Electricity, telephone

- 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.

Puget Sound Energy is the existing electricity provider. Transloaders run off diesel.

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: Brian Fraser

Date Submitted: 09/16/2025

D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS

(do not use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic hazardous substances; or production of noise?

Not likely given the control systems that will be in place: closed loop transfer equipment, dripless Dryloks, spill trays, standard operating procedures and checklists.

Proposed measures to avoid or reduce such increases are:

Employees will take hazardous materials training

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

No effect to plants, animals, fish, or marine life

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

Existing drain cover and spill response equipment and training

3. How would the proposal be likely to deplete energy or natural resources?

Not likely to deplete energy or natural resources

Proposed measures to protect or conserve energy and natural resources are:

Not applicable

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness,

wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

Not likely to use or affect these resources

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

Not likely to affect land and shoreline use

Proposed measures to avoid or reduce shoreline and land use impacts are:

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

New operation will likely see an increase in the number vehicles on-site and on the road.

Proposed measures to reduce or respond to such demand(s) are:

Coordinate delivery and shipping schedules; one way traffic flow on site

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

No conflict anticipated.