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

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

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

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

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

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

Date of issuance: November 8, 2023



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Determination of Non-Significance

PROJECT NAME: Port of Ilwaco East Bulkhead Resilience Project

APPLICANT NAME: Tracy Lofstrom (Port of Ilwaco Manager)

POINT OF CONTACT: Victoria England, Moffatt & Nichol

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

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

LEAD AGENCY: City of Ilwaco

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

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

☐ There is no comment period for the DNS.

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

Date of Determination and Issuance: November 8, 2023

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

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

Responsible Official:


Holly Beller, City Administrator

120 First Avenue

Ilwaco, WA 98624

360-642-3145

treasurer@ilwaco-wa.gov

Signature:  _____ Date: November 8, 2023

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

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

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

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

Instructions for applicants:

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

The checklist questions apply to 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.

Instructions for Lead Agencies:

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

Use of checklist for nonproject proposals:

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

A. Background [\[HELP\]](#)

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

Applicant Address: PO. Box 307
Ilwaco, WA 98624
Applicant Phone Number: (360) 642-3143
Applicant email: tlofstrom@portofilwaco.org

Contact Person: Victoria England (Moffatt & Nichol) 206-622-0222, email
vengland@moffattnichol.com

4. Date checklist prepared: June 2023

5. Agency requesting checklist: City of Ilwaco

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

Start Date: November 2024 End Date: February 2025

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

No.

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

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

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

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

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

- US Army Corps of Engineers (USACE) Section 10/404
- NOAA/NMFS: Endangered Species Act/Magnuson Stevenson Act consultation

- USFWS: Endangered Species Act
- City of Ilwaco: SEPA Determination
- City of Ilwaco Shoreline/Critical Areas Conditional Use Permit
- City of Ilwaco Master Planning Permit
- WA Dept. of Fish and Wildlife Hydraulic Project Approval (HPA)
- Dept. of Ecology (DOE) Coastal Zone Management (CZM) consistency
- WA Dept. of Natural Resources (DNR) Project Aquatic Use Authorization

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

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

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

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

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

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

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

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

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

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

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

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

Bulkhead Replacement

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

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

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

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

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

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

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

Slope Protection

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

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

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

Paving and Grading

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

Fill Impacts and Creosote Removal

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

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

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

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

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

Table 1. Approximate Fill Impacts

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

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

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

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

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

B. Environmental Elements [\[HELP\]](#)

1. **Earth** [\[help\]](#)

a. General description of the site:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

2. Air [\[help\]](#)

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

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

Construction

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

Operations and Maintenance

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

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

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

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

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

3. Water [\[help\]](#)

a. Surface Water: [\[help\]](#)

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 is located at the Port of Ilwaco Marina in Baker Bay near the mouth of the Columbia River.

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

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

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

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

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

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

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

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

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

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

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

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

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

b. Ground Water: [\[help\]](#)

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

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

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

Waste material will not be discharged into the ground.

c. Water runoff (including stormwater):

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

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

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

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

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

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

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

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

4. Plants [\[help\]](#)

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

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

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

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

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

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

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

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

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

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

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

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

5. Animals [\[help\]](#)

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

Examples include: See bold

birds: hawk, heron, eagle, **songbirds**, other:

mammals: deer, bear, elk, beaver, other:

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

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

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

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

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

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

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

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

See the attached JARPA and Biological Evaluation for additional information.

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

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

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

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

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

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

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

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

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

6. Energy and Natural Resources [\[help\]](#)

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

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

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

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

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

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

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

7. Environmental Health [\[help\]](#)

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

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

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

Creosote-treated timber structures are present at the site.

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

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

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

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

4) Describe special emergency services that might be required.

Special emergency services are not anticipated to be required.

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

Measures will be implemented to reduce the risk of creosote exposure during creosote-treated wood removal. Please see the attached JARPA and Biological Evaluation for a discussion on the minimization measures proposed for creosote treated wood removal.

b. Noise

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

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

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

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

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

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

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

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

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

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

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

8. Land and Shoreline Use [\[help\]](#)

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

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

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

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

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

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

c. Describe any structures on the site.

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

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

The following structures will be removed:

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

- Concrete rubble to the south of the bulkhead will be removed and replaced with riprap to accommodate construction of the bulkhead
- A floating timber structure will be removed from the south portion of the marina as part of project mitigation.

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

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

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

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

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

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

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

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

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

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

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

Zero. People would not be displaced by the Project.

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

None. No displacement impacts would occur.

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

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

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

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

9. Housing [\[help\]](#)

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

Zero.

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

Zero.

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

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

10. Aesthetics [\[help\]](#)

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

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

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

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

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

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

11. Light and Glare [\[help\]](#)

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

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

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

No. Lighting is not proposed.

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

There are no known off-site sources of light or glare that may affect the Project.

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

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

12. Recreation [\[help\]](#)

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

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

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

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

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

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

13. Historic and cultural preservation [\[help\]](#)

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

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

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

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

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

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

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

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

- An aboveground resource survey, formally documenting the East Bulkhead on 10 June 2022
- A Historic Property Inventory (HPI) form
- Site survey of upland buildings completed 12 April 2023

d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

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

14. Transportation [\[help\]](#)

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

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

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

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

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

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

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

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

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

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

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

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

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

The Project will mainly be completed from the water. There may be occasional vehicular trips associated with construction activities, however these have not been quantified.

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

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

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

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

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

15. Public Services [\[help\]](#)

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

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

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

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

16. Utilities [\[help\]](#)

- a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other _____

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

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

No utilities are proposed.

C. Signature [\[HELP\]](#)

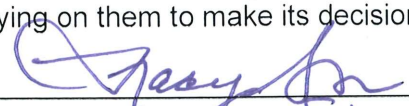
The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: _____

Name of signer: _____

Position and Agency/Organization: _____

Date Submitted: _____


Tracy Lotstrom
Manager, Port of Ilwaco
6/30/23

D. Supplemental sheet for nonproject actions [\[HELP\]](#)

(IT IS NOT NECESSARY to use this sheet for project actions)

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

When answering these questions, be aware of the extent the proposal, or the types of 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 or hazardous substances; or production of noise?

Proposed measures to avoid or reduce such increases are:

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

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

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

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

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

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

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

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

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

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

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