
VIII. NON-PROJECT SEPA

SEPA ENVIRONMENTAL CHECKLIST

A. Background

1. Name of proposed project, if applicable:
Comprehensive Sewer Plan - 2020 Update
2. Name of applicant: *Lake Whatcom Water and Sewer District*
3. Address and phone number of applicant and contact person:
*Lake Whatcom Water and Sewer District
1220 Lakeway Drive
Bellingham, WA 98229
Justin Clary, General Manager
Tel. 360-734-9224*
4. Date checklist prepared: *11/07/2019*
5. Agency requesting checklist: *Lake Whatcom Water and Sewer District*
6. Proposed timing or schedule (including phasing, if applicable):
Exact construction timing of the various improvement projects included in the Comprehensive Sewer Plan is unknown. The Plan identifies the anticipated schedule for projects and alternatives proposed for the next 10 years. Project funding will impact construction phasing.
7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.
This Comprehensive Sewer Plan covers planned sewer system improvements within the District for the next 20 years, with anticipated updates of the plan every ten years.
8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.
The District authorized an FEIS for provision of sewage disposal services to serve anticipated population along the South Shore of Lake Whatcom (Sudden Valley and Geneva areas). That 1997 FEIS investigated the direct and indirect impacts of anticipated ultimate populations in the Sudden Valley and Geneva areas of the District. An SEIS regarding potential changes to the operation of the Nooksack Diversion Dam was prepared in 2000-2001 for the District. An EIS was prepared for the proposed North Shore Estates (formerly Winchester Estates) subdivision, including sewer collection facilities, in the District's North Shore area. A non-project environmental checklist was prepared for the District's 2018 Water System Plan Update, which is the companion of this Plan update.
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.
None known.

10. List any government approvals or permits that will be needed for your proposal, if known.
It is anticipated that the following governmental approvals or permits may be required for the construction of sewer system improvements:

Washington Department of Ecology

- *NPDES Construction Activities stormwater management permit for construction projects disturbing areas greater than one acre.*

Whatcom County (various departments)

- *Approval of the Comprehensive Sewer Plan by County Engineer, County Health Officer, and County Council.*
- *Approval of construction plans and specifications for all improvements constructed in Whatcom County road rights-of-way, and for any structures requiring occupancy permits.*
- *Conditional use permit (e.g. new above-ground structures in residential areas).*
- *Shoreline substantial development permit if new facilities are within 200 feet of Lake Whatcom, Lake Louise, and lower portions of Austin Creek. The County's shoreline jurisdiction with respect to creeks is subject to modification.*
- *Right-of-way encroachment permits*
- *Land disturbance permit*
- *Critical Areas Ordinance review in the context of other permit applications, i.e. conditional use, shoreline, building permits, etc.*

Department of Fish & Wildlife

- *Hydraulic Project Approval for any construction below the ordinary high water mark of Lake Whatcom or its associated wetlands and tributary streams (none known at this time)*

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.

This proposal is a Comprehensive Sewer Plan which is a non-project action. The Comprehensive Sewer Plan addresses future growth planning in addition to the needs of maintaining an existing sewer system so the District can continue to operate a safe, reliable, and cost effective sewer system. The purpose of the Comprehensive Sewer Plan is to identify those projects the District will need to construct in order to continue to meet standards for capacity, I&I reduction and system replacement. District efforts will be focused on maintaining its existing pumping stations and sewer mains and reducing inflow and infiltration.

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 proposal includes the area within the Lake Whatcom Water and Sewer District boundary, in Whatcom County, Washington. A map showing the District Boundary is included in the Comprehensive Sewer Plan as Exhibit A.

B. Environmental Elements

1. Earth

a. General description of the site:

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

The "site" for this purpose is defined as the area within the District boundary. All types of terrain are included in the service area, but predominantly it is rolling and hilly, with some very steep areas.

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

There are cliffs within the service area (100% slopes). Steep slope areas would be avoided in the selection of construction locations for sewer system improvements.

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.

There is no known prime agricultural farm land in the District boundary. The soils include classifications of Squalicum, Chuckanut, Nati, Barneston-Everett, Sehome, Squires and Andic Xerochrepts. (Source: USDA-NRCS Custom Soil Resource Report)

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

Yes. Within the District boundaries, unstable slopes are evidenced by surface indications along Lake Whatcom Boulevard, west of Strawberry Point, and possibly along Agate Heights Road on the North Shore. There may be other areas as well. The District will engage site-specific geotechnical and structural expertise prior to the design and construction of its new reservoir facilities.

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.

In general, sewer main trench spoil is properly disposed of off site, and replaced with imported granular backfill material whenever the line is in a roadway or road shoulder. The quantity of imported backfill is approximately 30 cubic yards per 100 feet of pipe. For pump station construction, excess excavation spoil is also removed and properly disposed of offsite. The project site's surface is always restored to original or better condition.

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

The highest probability of erosion would occur during construction. Best Management Practices (BMPs) such as silt fences, silt check dams, cobbled construction entrances and directed site drainage are required and enforced by the District for its construction projects. The Department of Ecology Stormwater Management Manual for the Puget Sound and Whatcom County's regulations govern the BMP's.

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

The surface over sewer mains or pump stations would generally be restored to its condition prior to construction, i.e. mains in streets would have paved surfaces, mains in easements would have turf surfaces. Pump station upgrades may include a small amount of additional impervious surfaces for items such as valve vaults or generator pads. Whatcom County overlay zoning regulations stipulate the allowable level of impervious cover on a site. These rules typically do not affect sewer main construction or repair.

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

Implement County-approved temporary erosion and sedimentation control measures during construction, and re-vegetate immediately upon completion of construction. The District supervises contractor-implemented erosion control procedures for any District-funded construction projects.

2. Air

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

Temporary impacts: During construction, any construction project would result in dust and exhaust from heavy equipment such as backhoes, graders, dump trucks, and tractor/trailer trucks delivering heavy construction equipment. Construction workers' personal vehicles would also create dust and exhaust.

Permanent impacts: District staff would visit some of the facilities (e.g. pump stations, generators) for operational purposes, and their vehicles would create exhaust and possibly dust.

- 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:

Temporary impacts: Appropriate dust control measures will be implemented on District-managed construction projects.

Permanent impacts: District staff will endeavor to reduce the potential vehicle emissions from its trucks by managing operating procedures and service routes so as to minimize driving miles and properly maintaining vehicles.

3. Water

- a. Surface Water:

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

Lake Louise and the majority of Lake Whatcom is located inside the District boundaries. Several streams are also contained within the District's boundaries, including:

- *On the South Shore - Beaver Creek, which is tributary to Austin Creek, which is tributary to Lake Whatcom.*
- *On the North Shore - Smith Creek, Olsen Creek, and Carpenter Creek, which are tributaries to Lake Whatcom.*
- *South End - Anderson Creek, which is tributary to Lake Whatcom. Anderson Creek is also a component of the City of Bellingham's Middle Fork Nooksack River Diversion System.*

- 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.

It is possible that projects will be constructed within 200 feet of the waters listed. Plans will be developed prior to construction and the District will apply at that time for Shoreline Exemption permits for the work as it is normal maintenance and repair of existing facilities, and Shoreline Substantial Development permits when appropriate.

- 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.

No net removal of dredge or placement of fill in surface waters or wetlands is anticipated. However, fill and dredge is typically project-specific and will be addressed by the project environmental checklist, and appropriate permits.

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

This proposal for the Comprehensive Sewer Plan does not require additional surface water withdrawals or diversions. Provision of drinking water by the District currently requires direct surface water withdrawal for Sudden Valley and Geneva, and indirect surface water withdrawal for part of North Shore (City of Bellingham intertie). Lake Whatcom is the source of the surface water withdrawals. Projected quantities are included in the District's Water Use Efficiency Plan.

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

No. The City of Bellingham operates the Whatcom Falls dam and the Nooksack Diversion to attempt target water surface elevations of 314 feet above mean sea level during May through September, and 311.5 feet during November through March. April and October are transition months. There is not an identified 100-year floodplain associated with the Lake.

- 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.

The Plan does not include any project that would intentionally discharge waste materials to surface waters.

b. Ground Water:

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

This proposal for the Comprehensive Sewer Plan does not require additional ground water withdrawals nor will water be discharged to ground water. The District uses direct ground water withdrawals to supply part of North Shore. Water will not be discharged to ground water. Projected quantities are included in the District's Water Use Efficiency Plan.

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

No waste material from the proposed facilities will be purposely discharged into the ground.

In areas not served by public sewer, onsite sewage systems are allowed and approved by the Whatcom County Health Department.

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.

Sewer system projects will not create any new significant storm water runoff. Area storm water runoff flows to Lake Whatcom and its tributary streams.

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

The sewer system facilities will not discharge waste materials to the ground or surface waters.

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

This proposal for the Comprehensive Sewer Plan does not alter or otherwise affect drainage patterns in the vicinity of the site.

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

Public education is necessary to inform homeowners of the potentially serious impacts of some typical "home and garden" activities, such as cleaning paint brushes, changing motor oil, using lawn and garden fertilizers and pesticides.

The Lake Whatcom Management Plan includes a substantial educational component to provide this information.

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

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?

Sewer system maintenance and repair projects will generally be confined to traveled right-of-ways or previously disturbed areas. When hazard trees need to be removed, appropriate permits will be obtained from Whatcom County.

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

*The 1997 FEIS identified a state threatened plant species, water lobelia (*Lobelia dortmanna*) and a state sensitive species, southern mudwort (*Limosella acaulis*) as being recorded in historic records for the study area. No impacts to these species or their habitats are expected from sewer system projects.*

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

The surface over the sewer mains and adjacent to pump stations would generally be restored to its condition prior to construction (paved or unpaved). Landscaping at the perimeter of any sites will be accomplished in accordance with Whatcom County requirements established by the permits issued.

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

English ivy, water lily, evergreen and Himalayan blackberries, ErAsian watermilfoil, and many others listed in the Whatcom County Noxious Weed List.

5. Animals

- 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:

.X. birds: hawk, heron, eagle, songbirds, other: *ducks, seagulls, swans*

.X. mammals: deer, bear, elk, beaver, other: *cougar*

.X. fish: bass, Kokanee salmon, trout, herring, shellfish, other _____

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

See 1997 FEIS, page 3-52. The sewer system projects are not expected to harm endangered, threatened or sensitive species or their habitats, as the projects generally take place in traveled right-of-ways and previously disturbed areas.

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

The area is part of the Pacific Flyway bird migration route. Regular large concentrations of waterfowl appear at the north end of Lake Whatcom and on the Sudden Valley golf course.

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

The District's projects will be designed to minimize disruption of wildlife habitat by occupying traveled right-of-ways and previously disturbed areas to the largest extent possible.

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

Asian clams.

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.

Some sewer facilities are powered by electricity. Emergency backup power is supplied by propane or diesel generators.

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

Electric motors for the sewer facilities will have high energy efficiency requirements.

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.

None anticipated

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

None known.

- 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.

None known.

- 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.

None known.

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

No special emergency services are required. The District, City of Bellingham, and Whatcom County have prepared an emergency response plan for the watershed. The District has also completed an update to its own Emergency Response Plan.

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

The District was formed to reduce the environmental health hazards associated with septic systems located within the Lake Whatcom watershed, and continues to pursue this mission where it is allowed.

b. Noise

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

Temporary and Permanent: No existing noises would affect the construction and operation of sewer facilities.

- 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.

Temporary: Heavy construction equipment noise will occur during the daylight hours on weekdays during construction of sewer facilities.

Permanent: Auxiliary generators used in the event of power outages are somewhat noisy, even if housed and equipped with mufflers. The noise impact would occur during power outages and during regular weekly generator exercise periods. Generator installations in residential areas already exist at many sewage pump stations.

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

N/A.

8. Land and Shoreline Use

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

Residential development at varying densities with some commercial, resort, and public use. There are some public and private forestry tracts located adjacent to the residential zones.

- 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 working farmlands are known within the District boundaries. There are limited private working forest lands remaining after the 2014 reconveyance of 8,800 acres of forest lands around Lake Whatcom that were transferred to Whatcom County from the Washington Department of Natural Resources through.

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

No.

c. Describe any structures on the site.

There are approximately 4,300 equivalent residential connections in Sudden Valley, Geneva and North Shore, comprised primarily of single family residences, but also including two schools, two fire stations, condominiums, residential treatment center, neighborhood commercial center, camps, recreation center, restaurant and golf club. There are additional residences within the District's boundary that are not District customers.

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

None anticipated.

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

Refer to the official Whatcom County Zoning Maps for Sudden Valley, Geneva, North Shore and South Lake areas. Zoning designations include UR, RR2, RR3, and R5A, ROS, STC, NC, RF and CF.

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

The site is in the Lake Whatcom Special Study Area of the Whatcom County Comprehensive Plan. The District's intended sewer service areas were designated in the approved 2014 Comprehensive Sewer Plan. Most, but not all, of the Geneva area is included within the City of Bellingham's Urban Growth Area boundary. Other Comprehensive Plan designations include, UGA, Public Recreation, Rural Community, Rural Forestry, Commercial Forestry and Rural.

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

Lake Whatcom is a shoreline of statewide significance. The Lake Whatcom shorelands within the District include urban, rural, shoreline residential, resource, natural and conservancy shoreline designations, and the waters of Lake Louise and Lake Whatcom have aquatic designations. The portions of Austin Creek nearest to Lake Whatcom have an "Urban" or "Rural" shoreline designation under Whatcom County's Shoreline management Program.

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

The Critical Areas Ordinance of Whatcom County classifies some areas as environmentally sensitive for wetlands, steep slopes, alluvial fan hazards, wildlife conservation and critical aquifer recharge.

Lake Whatcom, Austin Creek, Beaver Creek, Whatcom Creek, Anderson Creek, Brannian Creek, Fir Creek, Smith Creek, Olsen Creek, Carpenter Creek and other unnamed creeks tributary to Lake Whatcom would be classified as Critical Areas.

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

No persons would reside at the proposed sewer facilities.

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

None anticipated.

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

Not applicable.

- L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:
The proposal is to provide public sewer service in accordance with existing zoned land uses, urban growth area / LAMIRD boundaries, or other permissible means.
- m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:
Not applicable.

9. Housing

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.
Direct: No housing units will be provided by the District.

Indirect: The Comprehensive Sewer Plan will support existing customers and anticipated growth in the District in accordance with Whatcom County zoning and regulations.
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.
Direct: No existing houses are anticipated to be eliminated by the proposed projects.

Indirect: Generally, no existing houses would be eliminated by new home construction. A conceivable exception would be the removal of an old house for replacement with a newer structure.
- 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 principal exterior building material(s) proposed?
The tallest proposed sewer system structure would be a new or replacement generator building for a sewer pump station. It would be the height of a single story building.
- b. What views in the immediate vicinity would be altered or obstructed?
Direct: None anticipated

Indirect: Additional homes have the potential to obscure or block some views.
- b. Proposed measures to reduce or control aesthetic impacts, if any:
The District will work with adjacent property owners to reasonably mitigate aesthetic impacts. However, an above-ground sewer system component cannot usually be totally buffered from sight. The costs of mitigating aesthetic impacts will be weighed against the benefits to the community.

11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?
Exterior security lighting at sewer system facilities can be directed so as not to disturb neighbors. Site perimeter vegetation buffers may also help mitigate for glare onto adjacent properties. Lighting would only occur at night.
- b. Could light or glare from the finished project be a safety hazard or interfere with views?

Direct: No. If a District-owned security light was determined to present a view impediment, it would be adjusted.

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

Direct: None will affect the provision of sewer service.

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

See 11.a above.

12. Recreation

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

Lake Whatcom provides public recreational opportunities including swimming, fishing, boating and water skiing. Private recreational opportunities include swimming, golfing, parks, recreation center in Sudden Valley, and private campgrounds and church camps.

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

Direct: No displacement of existing recreational use is anticipated.

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

Direct: No measures proposed.

13. Historic and cultural preservation

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

Direct: See 1997 FEIS, pages 4 - 58-59. the known petroglyph site will not be impacted by any sewer system construction. Utility lines are usually constructed within existing right-of-way corridors, so there is virtually no potential conflict with historic sites.

Indirect: The 1997 FEIS identified the possibility that archaeological resources may be discovered in the process of future homebuilding around Lake Whatcom.

- 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.

See 1997 FEIS, pages 4 – 58-59.

- 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 District would consult with an archeological professional to assist them in assessing the potential impacts to cultural and historic resources on or near project sites, when specific projects are proposed for construction.

- 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.

Wherever possible, new facilities will be located such that they do not impact cultural and historic resources. If avoiding the resources is not possible, measures to minimize and/or compensate will be addressed in project-specific SEPA checklists and appropriate permits.

If potentially important archaeological material is uncovered during any sewer system construction project, the excavation will be stopped and the Washington State Office of Archaeology and Historic Preservation will be contacted.

14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.
Existing arterial access to Geneva and Sudden Valley is via Lakeway/Cable Street/ Lake Whatcom Blvd. and Lake Louise Road from Bellingham. Access to Sudden Valley from Interstate 5 to the south is via Highway 9 and Lake Whatcom Blvd. Access to North Shore is via North Shore Road, or via Britton Road from Hwy 542 (Mt. Baker Highway). There are numerous public streets in the Geneva and North Shore areas, and numerous private streets created by the plats of Sudden Valley.
- The District has no legislative authority to create and maintain roads, so has no role in transportation issues.*
- 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?
Geneva and Sudden Valley are currently served by public transportation provided by Whatcom Transit Authority. Stops exist along Lake Whatcom Blvd and Cable Street. The North Shore is not served by regular public transportation.
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?
Sewer facilities need only the temporary parking necessary for operator and service trucks, one – two spaces at most.
- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).
No new streets are anticipated for access to the proposed sewer facilities.
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.
The District service areas are not in the immediate vicinity of public water, rail or air transportation.
- 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 number of vehicular trips generated by any new sewer system facilities would be less than one per day per facility. Upcoming projects are primarily replacement and maintenance of existing sewer facilities, and would generate no additional vehicular trips.
- 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.
- h. Proposed measures to reduce or control transportation impacts, if any:
The District has no authority to reduce or control transportation impacts from any activity other than its own operations.

15. Public Services

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

The sewer service facilities would not directly require new public services, other than power to run pump stations and controls.

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

Direct: Does not apply.

16. Utilities

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

- 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.

Direct: The proposed sewer facilities would possibly utilize electricity, and natural gas (or delivered propane or diesel) for emergency generators.

Indirect: The District proposes to provide sewer service to serve properties that can be legally developed in accordance with existing plats, zoning and building regulations. General construction activities required to provide such services would include: excavation for utility lines and underground structures such as valve vaults; installation of emergency backup generators for major pumping stations; construction of driveways and access roads, surface grading, drainage, restoration and landscaping.

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:  _____

Name of signee: *Melanie Mankay, P.E.*

Position and Agency/Organization: *Wilson Engineering, L.L.C., 805 Dupont St., Suite 7, Bellingham, WA 98225*

Consulting Engineers for Lake Whatcom Water and Sewer District

Date Submitted: 11/07/2019

D. Supplemental sheet for nonproject 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?

Direct Impacts: Repair, maintenance or construction of sewer mains and pump stations will have negligible impacts on discharge to water, emissions to air, release of toxic substances, or production of noise.

No storage, production, or transportation of hazardous materials is anticipated for the service area, other than expansion of activities already taking place, such as transportation of chlorine gas, sodium hypochlorite, and sodium sulfite for water treatment purposes, and transportation of gasoline by others to the privately-owned service station in Sudden Valley.

Proposed measures to avoid or reduce such increases are:

See the Water Source Protection Plan for the Lake Whatcom Watershed, prepared by the Lake Whatcom Management Team (Whatcom County, Lake Whatcom Water and Sewer District and the City of Bellingham).

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

The District's sewer system construction projects will have minimal impact on plants and animals, negligible impacts on fish, and none on marine life, as most proposed facilities will be located within existing right-of-ways, or previously disturbed areas.

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

Continued implementation and enforcement by Whatcom County of best management practices for stormwater runoff, including enforcement and maintenance beyond the temporary construction impacts.

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

Construction of sewer system facilities will use energy and water. The activities will not deplete energy or natural resources.

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

The District will specify high efficiency motors for its facilities in order to conserve energy. The District will continue to promote water conservation through tracking and reducing distribution system losses, residential water audits, new construction requirements for water-saving fixtures, and public education. The District is implementing its Water Use Efficiency Program. The District also has a robust Inflow and Infiltration reduction program, where the goal is to reduce the quantity of outside water entering the sewer system, thereby reducing the volume of wastewater to pump and treat.

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?

This proposal does not impact significant wilderness areas or prime farmlands because the majority of land within the Geneva and Sudden Valley areas is already platted, the North Shore area is zoned R5A, and all areas are inhabited to varying degrees. The area is not in a floodplain. The majority of frontage of Lake

Whatcom is already occupied by homes, so the public access to the lake for recreational opportunities will not be significantly impacted by construction of additional homes.

Lake Whatcom is the primary source for treated drinking water for the District and City of Bellingham. Protection of this resource is the most serious responsibility, and one which the District takes very seriously. The District's 1997 FEIS studied all of the environmental impacts of providing services, which may allow population to increase in accordance with platting, zoning and development regulations.

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

To the largest extent possible, District projects will be confined to traveled right-of-ways, or previously disturbed areas, to avoid directly impacting wildlife habitat.

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?

The Comprehensive Sewer Plan seeks to provide adequate sewer service to serve existing land use plans, and would, by definition, be compatible.

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

To the largest extent possible, District sewer system projects will be confined to traveled right-of-ways, or previously disturbed areas, and will mitigate permanent shoreline impacts when replacement or maintenance projects are located near the shoreline.

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

Population increases in accordance with zoning and building regulations will increase demands on the roads and other public services. These impacts must be planned for and addressed by the responsible agencies (such as the fire districts, school districts, gas and electric companies, and Whatcom County), just as the District has done for sewer and water services.

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

The District is the water and sewer service provider for the area, and therefore does not have the authority to undertake reducing such demands unilaterally. However, the District participated with Whatcom County and the Sudden Valley Community Association in a density reduction program in Sudden Valley that promoted activities such as lot consolidation and conservancy designations.

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

The Comprehensive Sewer Plan - 2020 Update is itself a requirement of WAC 173-240 and the Washington Department of Ecology. The District is authorized to operate systems of sewers by Title 57 RCW, and the improvements (including alternatives) identified in the Plan update represent the District's efforts to provide reliable sewerage collection and transport services to the public in accordance with all local, state and federal laws.