

February 22, 2021

United States Department of Agriculture (USDA) Rural Development Attn: Paul Johnson, Environmental Specialist 1835 Black Lake Boulevard SW, Suite B Olympia, WA 98512

and

Scatchet Head Water District Attn: David Mullins 7906 Guemes Ave Clinton, WA 98236

Re: ENVIRONMENTAL ASSESSMENT FOR NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) REVIEW Scatchet Head Water District Water System improvements Project Whidbey Island, WA

Dear Paul Johnson and David Mullins,

Davido Consulting Group (DCG) is pleased to present the attached Environmental Report for the proposed Scatchet Head Water District (SHWD) Water System improvements Project for NEPA review. This report is intended to provide environmental information that will assist the United States Department of Agriculture (USDA) in conducting an environmental review process associated with a USDA Rural Development loan program and grant application. SHWD will be the recipient of the grant.

This report was compiled using information provided by SHWD (the applicant), a review of public information, an on-site investigation of the subject area, and the professional judgment of our environmental specialists.

Should you have any questions concerning this report, please contact Robert Bennion of DCG at (360) 331-4131 (x206) or robert@dcgengr.com.

Sincerely,

Robert Bennion, P.E. Davido Consulting Group, Inc.

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TABLE OF CONTENTS

1.0	Purpose and Need1					
1.1	Project Description1					
1.2	Purpose and Need1					
2.0	Alternatives Evaluated Including the Proposed Action					
2.1	Proposed Action5					
2.2	Other Alternatives Evaluated5					
2.3	No Action Alternative6					
3.0	Affected Environment and Environmental Consequences					
3.1	Land Use/Land Ownership7					
3.2	Floodplains7					
3.3	Wetlands8					
3.4	Cultural Resources8					
3.5	Biological Resources8					
3.6	Water Resources10					
3.7	Coastal Resources11					
3.8	Socioeconomics and Environmental Justice11					
3.9	Air Quality12					
3.10	Noise					
3.11	Transportation					
3.12	Aesthetics					
3.13	Human Health and Safety13					
3.14	Corridor Analysis					
4.0	Cumulative Effects					
5.0	Summary of Mitigation14					
6.0	Coordination, Consultation and Correspondence14					
7.0	List of Preparers					

LIST OF FIGURES

Figure 1. I	Regional Map		;
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LIST OF TABLES

Table 1. Contact Information	. 1
Table 2. Distribution Alternatives Evaluated	. 3

LIST OF APPENDICES

Appendix A	Site Plan
Appendix B	IPaC Results
Appendix C	Sole Source Aquifer Checklist
Appendix D	CZMA Consistency Determination Letter

ACRONYMS AND ABBREVIATIONS

AC	Asbestos Cement
CZMA	Coastal Zone Management Act
DCG	Davido Consulting Group, Inc.
DOH	Department of Health
DSL	Distribution System Leakage
gpm	Gallons per Minute
MDD	Maximum Day Demand
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRCS	Natural Resources Conservation Service
OAHP	Office of Archeology and Historic Preservation
RD	Rural Development
ROW	Right-of-Way
SEC	State Environmental Coordinator
SHWD	Scatchet Head Water District
UDP	Unanticipated Discovery Plan
USDA	United States Department of Agriculture
WDFW	Washington Department of Fish and Wildlife

ENVIRONMENTAL REPORT FOR THE SCATCHET HEAD WATER DISTRICT FOR THE WATER SYSTEM IMPROVEMENTS PROJECT

Applicant	Applicant's Agent	USDA Environmental Specialist			
Scatchet Head Water District	Davido Consulting Group, Inc.	USDA Rural Development			
Attn: David Mullins	Attn: Robert Bennion, PE	Attn: Paul Johnson			
7906 Guemes Ave	P.O. Box 1132	1835 Black Lake Blvd SW, Suite B			
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Table 1. Contact Information

1.0 PURPOSE AND NEED

USDA, Rural Development is a mission area that includes three federal agencies – Rural Business-Cooperative Service, Rural Housing Service, and Rural Utilities Service. The agencies have in excess of 50 programs that provide financial assistance and a variety of technical and educational assistance to eligible rural and tribal populations, eligible communities, individuals, cooperatives, and other entities with a goal of improving the quality of life, sustainability, infrastructure, economic opportunity, development, and security in rural America. Financial assistance can include direct loans, guaranteed loans, and grants in order to accomplish program objectives. The applicant is seeking federal financial assistance from the USDA Rural Development Service, Water and Environmental Programs.

1.1 Project Description

The proposed improvements for the Scatchet Head Water District (SHWD) Water System Improvements (Water System Identification 76470 X) includes the replacement of aging watermains, source pumps, and other treatment and source improvements on southern Whidbey Island, Washington, between Cultus Bay and Useless Bay.

1.2 Purpose and Need

The SHWD is a Group A Community water system currently providing potable water to 413 connections, including 4 non-residential connections, within its service area. The SHWD's distribution system is served by 2 groundwater wells. The system is currently hampered by deferred maintenance. Through a system analysis and information provided in the Water System Plan completed in 2020, the District has determined that many of the components of the water treatment and distribution system have reached or exceeded the end of their useful life. These components include asbestos cement (AC) water mains, source pumps, treatment system components, and associated valves.

The existing AC piping was installed in 1958 thereby exceeded their useful life of approximately 50 years. There have been several recent leaks in the distribution system that have required repairs. This is a particular concern for the system in locations of steep slopes and areas where landslides have or may occur. The District is prioritizing the replacement of the AC water mains that are located near or along these steep slopes and the sections of pipes that have a history of leaks.

Both wells are located on parcel number S8110-00-12018-2. Both wells have pumps and meters that were installed in 1995 and 1997, respectively. Submersible well pumps and meters have an anticipated useful

life of 10 to 15 years. Both the submersible well pumps and source meters are at or have surpassed their anticipated useful life and will need to be replaced. There is additional piping in the well house that needs to be replaced and sized in accordance with state standards.

The treatment facility filter media has surpassed its useful life and is not efficiently removing iron and manganese. As a result, the system requires frequent backwashing which uses about 40,000 gallons of treated water a month or 15% of the treated water produced. The large volume of backwash water is also overwhelming the onsite infiltration area. In addition to replacing the filter media, the pumphouse has experienced leaking and a deterioration of the ductile iron piping within the building in the past few years due to oxidation which has occurred from off-gassing from chloring tanks stored in the pumphouse which needs to be replaced.

Given these factors, SHWD is seeking funding from the USDA to ensure continued safe drinking water to this island community.

1.2.1 Health, Sanitation and Security

In the existing conditions, the SHWD is at risk of failed water mains, well pumps, and other aging infrastructure. This presents a health risk from potential intrusion of contaminated surface water or back siphoning from the higher service connections. If a watermain breaks, a depressurization event will occur, presenting a cross-contamination risk throughout the system. Additionally, each break provides a point of entry for foreign contaminants to enter the system.

1.2.2 Aging Infrastructure

As frequently occurs with small systems, the system has been operated for an extended period without a proper plan in place for replacing and updating the aging infrastructure. Much of the system components are at or are nearing the end of their useful life. The reported average Distribution System Leakage (DSL), in 2019, was 14.1% with a 3 year annual average of 13.7%. The system's DSL indicates that there are potential problems with the aging water main in the distribution system. The proposed waterline replacement and treatment system improvements are anticipated to reduce the water loss in the distribution system. In addition, there are several residences that are only served by dead-end mains. The District is therefore prioritizing the replacement of the AC water mains that are major hubs for the system, are located near or along steep slopes, and have a history of leaks and repairs.

Both groundwater wells have meters and pumps that have surpassed their anticipated useful life of 15 years. Reliable source production is a key to providing water to the system. To ensure continued functionality, replacement of both well pumps and meters is included in the proposed improvements.

1.2.3 Fire Flow

Island County requires that new or expanding Group A residential system be capable of delivering fire flow at 500-gpm for 30 minutes with a minimum pressure of 20-psi at all locations, with the largest pump out of service. This would require at least 15,000 gallons of fire suppression storage in addition to the other required storage components including operational, equalizing, and dead storage. The existing reservoirs have a nominal storage volume of 420,000 gallons and can provide the necessary storage for fire flow.

Currently, the system is configured with four 7.5 HP Aurora Series 340/360 booster pumps, each of which is capable of providing approximately 220-gpm. DOH standards require that system be evaluated for fire flow with the largest pump out of service while the system supplies maximum day demand (MDD). With one of the four operating booster pumps out of service, the three remaining pumps can provide 660-gpm combined, which is in compliance with DOH standards.

Several areas within the existing system have 2-inch and 4-inch watermains and are not capable of supplying 500-gpm without excessive loss of pressure. Generally, a minimum of 6-inch piping is necessary to allow for MDD and fire flow demand. Where water mains are replaced and hydrants located, those lines should be sized to allow for fire flow demand. Where applicable, hydrants should be spaced in accordance with state and local standards.

1.2.4 Reasonable Growth

The SHWD updated their Water System Plan in 2020 with the Washington State Department of Health (DOH). This updated plan provided projected growth over the next 20 years and evaluates system components to support current and future demands. Currently the system has 413 connections, including 4 non-residential connections, and is approved by the DOH to serve a potential of 597 equivalent residential units (ERUs). The system components should be sized in consideration of future demand.

2.0 ALTERNATIVES EVALUATED INCLUDING THE PROPOSED ACTION

Five alternatives were evaluated during the early planning and design phase of the proposal. Each of the alternatives was examined based on the evaluation criteria that SHWD deemed would be the primary drivers for their selection of their preferred alternative (Table 2). The evaluation criteria examined provide a higher probability of the long-term viability of the distribution system to maintain water service throughout the water system boundary.

Alternative	Evaluation Criteria	Performance				
	Ability to Maintain Water Service During Construction	Yes, installation of water mains can be located and phased to maintain water service to the consumers during construction. There is a short shutoff for individual services when they are switched over to the new main prior to the old main being abandoned.				
Alternative 1	Annual O&M Requirements	Normal O&M requirements expected				
Open Trench	Contaminated Water Intrusion Risk	Unlikely				
Replacement	Efficacy of replacement along non- linear and highly interrupted water mains	Effective				
	Lifespan	60 years				
	Maintenance/Shutdowns	Normal maintenance and shutdowns expected				
	Replacement Cost	Low				
Alternative 2 Directional Drilling	Ability to Maintain Water Service During Construction	Yes, installation of water mains can be located and phased to maintain water service to the consumers during construction. There is a short shutoff for				

Table 2. Distribution Alternatives Evaluated

Alternative	Evaluation Criteria	Performance					
		individual services when they are switched over to the					
		new main prior to the old main being abandoned.					
	Annual O&M Requirements	Normal O&M requirements expected					
	Contaminated Water Intrusion Risk	Unlikely					
	Efficacy of replacement along non-	Moderately effective. This process can accommodate a					
	linear and highly interrunted water	degree of non-linear pipe alignments, but the line must					
	mains	be accessed at all crossings, service connections, and					
		valves.					
	Lifespan	60 years					
	Maintenance/Shutdowns	Normal maintenance and shutdowns expected					
	Replacement Cost	Medium					
	Ability to Maintain Water Service	No, existing mains must be shut down during the					
	During Construction	entirety of construction					
	Annual O&M Requirements	Normal O&M requirements expected					
	Contaminated Water Intrusion Risk	Unlikely					
Alternative 3	Efficacy of replacement along non-	Moderately effective. This process can accommodate a					
Pipe Bursting	linear and highly interrupted water	degree of non-linear pipe alignments, but the line must					
	mains	be accessed at all crossings, service connections, and					
	1.1	valves.					
	Lifespan	60 years					
	Maintenance/Shutdowns	Normal maintenance and shutdowns expected					
	Replacement Cost	High					
	Ability to Maintain Water Service	No, existing mains must be shut down during the					
	During Construction	method is developed to some residences					
	Appual O&M Requirements	Normal Q&M requirements expected					
	Contaminated Water Intrusion Risk	Inlikely					
Alternative 4		Moderately effective. This process can accommodate a					
Cured-in-	Efficacy of replacement along non-	degree of non-linear nine alignments, but the line must					
Place Pipe	linear and highly interrupted water	be accessed at all crossings, service connections, and					
	mains	valves.					
	Lifespan	60 years					
	Maintenance/Shutdowns	Normal maintenance and shutdowns expected					
	Replacement Cost	High					
	Ability to Maintain Water Service						
	During Construction	Not Applicable					
	Annual O&M Requirements	Extensive O&M requirements expected					
	Contaminated Water Intrusion Risk	High – Susceptible to contaminated water intrusion					
	Efficacy of replacement along non-						
Alternative 5	linear and highly interrupted water	Not Applicable					
NO ACTION	mains						
	Lifespan	Not Applicable					
	Maintenance/Shutdowns	Will result in operational issues as pipe failures lead to					
		unscheduled system shutdowns to repair lines.					
	Replacement Cost	Not Applicable					

2.1 Proposed Action

Selected: Alternatives 1, 2, and 3

Based upon the goals of the District, evaluation criteria, and the required long-term viability of the water system, the selected alternative is to primarily use a standard open trench installation (Alternative 1) of new water mains over the majority of the system with directional drilling (Alternative 2) and potentially pipe bursting (Alternative 3) in select locations.

There are currently sections of system that are dependent on a single water main to provide water due to the lack of loops in the system. This reduces the efficiency of the trenchless solutions since it would be cost prohibitive to prove a significant number of connections with water throughout the installation and testing process. Due to the location of water mains outside of asphalt (except at the crossing) and limited conflicts with existing utilities, many of the benefits of trenchless installation are nullified. It is anticipated that the most efficient and effective means of water main replacement, in most cases, will be to install a new line via open cut processes (Alternative 1) so that the existing services can be maintained until reconnection to the new water main is prepared and approved. The potential exceptions to this include the following sites:

- 1. Island County will require that all asphalt area crossings within their ROW be installed through a sleeve that is installed via directional drill (Alternative 2).
- 2. Between Hubble Court and Driftwood Drive: This section of pipe is located within a steep slope and, therefore, directional drilling (Alternative 2) would need to be employed if this alternative is able to be installed.
- 3. The portion of Fidalgo Drive between Harpoon Lane and George Drive: This section of pipe has no services and passes along the toe of a steep slope that has experienced a landslide in the past few years. Therefore, pipe bursting (Alternative 3) may be used at this location. This would allow the system to limit the disturbance to the slope through this section of pipe but should be evaluated in conjunction with the County, if proposed.

2.2 Other Alternatives Evaluated

Not Selected: Alternatives 4 and 5

Cured-in-Place Pipe (CIPP) (Alternative 4) consists of installing a flexible liner into the existing water main and embedding it with epoxy resin. The lining does not conform well to fittings in a system. Therefore, access to the water main is required at all fittings and service connections to allow for other connections. Also, since this re-lines an existing pipe, all services connected to or dependent upon that line for service would not have water unless an alternative, temporary method of supply was installed. This process is most efficient on uninterrupted sections of water main. Cost benefits for this method occur from avoiding disturbances to critical areas, pavement, adjacent utilities, and structures which are not a significant factor with the proposed projects. For these reasons Alternative 4 was not selected.

The No Action Alternative (Alternative 5) is to maintain the status quo. However, this 'no action alternative' leaves the system prone to failure, contamination, and potentially many consumers without a water supply. This alternative also results in operational issues as pipe failures lead to unscheduled system shutdowns to repair lines. Additional problems will arise as the system will be unable to properly remain within the withdrawal quantity set forth by the Department of Ecology.

2.3 No Action Alternative

See the response provided in Section 2.2.

The system could attempt to maintain the existing water mains and continue to repair leaks as they occur. Each repair represents a loss of service and potential contamination event. This does not provide the reliable level of service that is required by the DOH, due to the potential health concerns. In addition, it is anticipated that these problems will become exacerbated over time as the water mains age. Many of the existing pipes are beyond their useful life and the continued corrosion of the ductile iron piping in the pumphouse piping is no longer sustainable. This piping is already failing and being replaced as needed. Allowing the piping to fail will increase outages, degrade other infrastructure, and provide increased potential for contamination of the water in the distribution system. In addition, if the system continues to use the well pumps without replacing them, they will eventually fail and will have to be taken offline until an emergency replacement can occur.

In the year 2018, the SHWD spent about \$17,500 on repairs and maintenance. If no improvements are made to the system, the cost of maintenance and repairs is estimated to increase each year as infrastructure continues to age and as problems arise. If any emergency repairs or replacement need to occur, the cost of repairs and maintenance will likely increase significantly.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Whidbey Island, Washington stretches 45 miles from north to south and is one of several linear features within the northern Puget Sound region. The project area is located between Cultus Bay and Useless Bay in southern Whidbey Island (Figure 1). The region has warm, dry summers and mild, wet winters that allow some unusual flora to survive in this biogeoclimatic zone. Differences in precipitation from place to place are caused largely by the proximity of the Olympic Mountain range on the west. Prior to the influx of European settlers, the project area likely supported a mixed prairie-forest vegetation with a solid component of Douglas fir which is rare in much of Western Washington's climax hemlock (Tsuga heterophylla) and cedar (Thuja *plicata*) forests. Moisture in the prevailing south westerly winds condenses when the air strikes the Olympics, and before they reach central Whidbey Island, they have lost much of their moisture. Thus, while some areas on Whidbey Island would have supported the classic coastal western hemlock and cedar forest, this part of Whidbey Island enjoys a rain shadow from the Olympic Mountains, and soil development that has encouraged many prairie areas.



Figure 1. Regional Map

3.1 Land Use/Land Ownership

3.1.1 General Land Use

3.1.1.1 Affected Environment

The SHWD is a municipal corporation as set forth in the Revised Code of Washington (RCW) Title 57 and authorized by the Island County ordinances. The District is located southwest of Clinton, Washington. The Proposed Action area is zoned as Rural. No purchasing of property is required for this project. The total area that will be disturbed by construction for and operation of the proposal is approximately 11,700 linear feet. Current land uses in the area affected by the proposal are residential; no change in use is proposed.

3.1.1.2 Environmental Consequences

The Proposed Action is not expected to impose impacts to general land uses. There will be no anticipated significant impacts on land uses resulting from the construction, operation, or maintenance.

3.1.1.3 Mitigation

None proposed.

3.1.2 Important Farmland

The Proposed Action will not construct a facility or take an action that directly or indirectly converts land classified and defined as "farmland" by the Natural Resources Conservation Service (NRCS) to nonagricultural uses. According to the NRCS Web Soil Survey, the site is classified as 'Prime farmland if irrigated', 'Farmland of statewide importance', and 'Not prime farmland'; however, the proposed project is a utility line project and is not subject to important farmland analysis, per the USDA's Guide to Applicants for Preparing Environmental Reports for Categorical Exclusions Under Section 1970.54.

3.1.3 Formally Classified Lands

The project site is located in Island County, which is subject to the federal Coastal Zone Management Act (CZMA) and is managed by the Washington State Department of Ecology. Additionally, the project site is within several miles of Possession Point State Park and South Whidbey Island State Park. The Pacific Northwest National Scenic Trail traverses Whidbey Island, however, it does not cross the project site.

3.2 Floodplains

The Proposed Action is not subject to FEMA floodplain regulations, as it is categorized as a buried utility project. Additionally, the majority of the project site is not located within a 100 year or 500 year floodplain, except for the portion along Driftwood Drive in a Zone A floodplain.

3.3 Wetlands

The Proposed Action is located within 300 feet of four known wetlands as observed from Island County's critical areas database and the National Wetlands Inventory mapper. The first and largest wetland (Category D¹ (Native Plant Wetland), acreage not specified) is located on six parcels adjacent to George Drive. The second wetland (Category E¹, 0.3 acres) appears to lie at the confluence of two unnamed tributaries to Cultus Bay. This wetland spans five parcels near the corner of George Drive and Fidalgo Drive. The third wetland (Category E¹, 0.1 acres) spans four parcels between Mitford Lane and Periwinkle Road. Finally, the fourth wetland (Category E¹, 0.1 acres) spans one parcel and lies just beyond the bounds of the Water District, north of Mitford Lane.

These wetlands will not be impacted by this ROW utility project and therefore, this section is not applicable.

3.4 Cultural Resources

This section will be completed by USDA RD via Section 106 Consultation of the National Historic Preservation Act (NHPA). A Cultural Resource Report will be submitted to the USDA as part of this application process.

3.5 Biological Resources

3.5.1 General Fish, Wildlife and Vegetation

3.5.1.1 Affected Environment

Fish and Wildlife

According to the Washington Department of Fish and Wildlife (WDFW) Priority Habitats and Species Program, the following habitats and species are found within the project area: Waterfowl Concentrations, Estuarine Zone, Cliffs/Bluffs, Estuarine and Marine Wetland, Big Brown Bat (*Eptesicus fuscus*), and Little Brown Bat (*Myotis lucifugus*).

Vegetation

In general, vegetation across the site consists primarily of residential grasses, shrubs, and trees along with typical Whidbey Island steep slope species.

3.5.1.2 Environmental Consequences

The Proposed Action is not expected to impose impacts to general fish, wildlife, and vegetation species. There will be no anticipated significant impacts on species resulting from the construction, operation, or maintenance.

3.5.1.3 Mitigation

Noise pollution, that may interfere with typical bat activities, will be abated by limiting the use of noisy equipment to reasonable daylight hours.

¹ Wetlands are classified per Island County Code 17.02B.460.B.

3.5.2 Listed Threatened and Endangered Species

3.5.2.1 Affected Environment

The Proposed Action will have **no effect** on the below listed species because these species are unlikely to occur due to their rare or unconfirmed occurrence and lack of suitable habitat within the action area: Canada Lynx (*Lynx canadensis*), Golden Paintbrush (*Castilleja levisecta*), Gray Wolf (*Canis lupus*), Grizzly Bear (*Ursus arctos*), Northern Spotted Owl (*Stix occidentalis caurina*), Oregon Spotted Frog (*Rana pretiosa*), Streaked Horned Lark (*Eremophila alpestris strigata*), and Yellow-Billed Cuckoo (*Coccyzus americanus*).

There are no designated or proposed critical habitats or proposed species within the action area (Appendix B - IPaC Results).

3.5.2.2 Environmental Consequences

The Proposed Action is not expected to impose impacts to listed threatened or endangered species. There will be no anticipated significant impacts on species resulting from the construction, operation, or maintenance.

3.5.2.3 Mitigation

None proposed.

3.5.3 Migratory Bird Treaty Act

3.5.3.1 Affected Environment

While Island County is located within the Pacific Migratory Bird Flyway, the Proposed Action is unlikely to impact to migratory birds given the underground nature of the work and minimal noise levels during construction.

3.5.3.2 Environmental Consequences

The Proposed Action is not expected to impose impacts to migratory bird species. There will be no anticipated significant impacts on species resulting from the construction, operation, or maintenance.

3.5.3.3 Mitigation

None proposed.

3.5.4 Bald and Golden Eagle Protection Act

The Proposed Action is not expected to impose impacts to bald or golden eagles or their nesting sites; therefore, this section is not applicable.

3.5.5 Invasive Species

3.5.5.1 Affected Environment

There are no known invasive plant or animal terrestrial species known at the project location other than the typical Himalayan blackberry, English ivy, and English holly in the region. There is a very low probability that the Proposed Action could introduce, spread, or contribute to the continued existence of noxious weeds or non-native species in the area affected by the proposal.

3.5.5.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to surrounding native habitats. There will be no anticipated significant impacts on biological resources resulting from the construction, operation, or maintenance.

3.5.5.3 Mitigation

None proposed.

3.6 Water Resources

3.6.1 Water Quantity

3.6.1.1 Affected Environment

Subsurface water quality in the area is generally considered adequate. An expansion to the existing water right is not needed at this time.

3.6.1.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to surrounding water quantity as the desired capacity is not greater than the current withdrawal rate. Additionally, no downstream affects are anticipated as no additional groundwater will be accessed. There will be no anticipated significant impacts on water resources resulting from the construction, operation, or maintenance. See Section 5.0 for further details.

3.6.2 Water Quality

3.6.2.1 Affected Environment

The project site is located in a sole source aquifer per the Designated Sole Source Aquifers mapper (Appendix C - Sole Source Aquifer Checklist). The project is not part of a State or Federally mandated cleanup effort, and there has not been nor are there currently violations of State water statutes or wastewater discharge permits.

3.6.2.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to surrounding water quality. There will be no anticipated significant impacts on water resources resulting from the construction, operation, or maintenance.

3.6.2.3 Mitigation

See Section 5.0 for further details.

- 1. During water line trenching, best management practices (BMP) for minimizing erosion and sediment control will be used, including silt fencing and limiting the amount of exposed soil, during construction.
- 2. Solid Waste Management: Existing waterlines will be abandoned in place. Development wastes, such as soils and chipped organic matter will be distributed on site. Construction wastes will be collected by the contractor and taken to the Island county Solid Water Transfer Site.

3.7 Coastal Resources

3.7.1 Coastal Zone Management Act

3.7.1.1 Affected Environment

Washington's Coastal Zone Management Program goals include protecting, restoring, and responsibly developing the state's marine shorelines in Puget Sound and Pacific Ocean coast. Island County is subject to this federal act. A CZMA Consistency Determination Letter has been submitted to Loree Randall of the Washington State Department of Ecology (Appendix D – CZMA Consistency Determination Letter). It is anticipated that the Proposed Action will be exempt or have no negative impact.

3.7.1.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to coastal resources. There will be no anticipated significant impacts on coastal resources resulting from the construction, operation, or maintenance.

3.7.1.3 Mitigation

None proposed.

3.7.2 Coastal Barrier Resources Act

The Coastal Barrier Resources Act of 1982 established the John Chafee Coastal Barrier Resources System which consists of undeveloped coastal barrier lands along the Atlantic, Gulf, and Great Lakes coasts. Proposed units have been identified but not designated along the Pacific coast; therefore, this section is not applicable to the Proposed Action.

3.8 Socioeconomics and Environmental Justice

3.8.1 Affected Environment

This project entails the installation of a residential water system. No adverse human health or environmental issues will result from this project.

3.8.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to surrounding socioeconomics or environmental justice. There will be no anticipated significant impacts on socioeconomics or environmental justice resulting from the construction, operation, or maintenance.

3.8.3 Mitigation

None proposed.

3.9 Air Quality

3.9.1 Affected Environment

There will be some minor, temporary dust, and exhaust caused by the construction activities in the immediate vicinity.

3.9.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to surrounding air quality. There will be no anticipated significant impacts on air quality resulting from the construction, operation, or maintenance.

3.9.3 Mitigation

None proposed.

3.10 Noise

3.10.1 Affected Environment

There will be some minor, temporary noise caused by the construction activities in the immediate vicinity.

3.10.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to surrounding noise levels. There will be no anticipated significant impacts on noise levels resulting from the construction, operation, or maintenance.

3.10.3 Mitigation

Noise pollution will be abated by limiting the use of noisy equipment to reasonable daylight hours.

3.11 Transportation

3.11.1 Affected Environment

Access to the project site is by private vehicle. Island Transit has a six bus stops within the project site: (1) Blakely Ave at Harper St, (2) San Juan Ave at Harper St, (3) Hat St at San Juan Ave, (4) Blakely Ave at Hat St, (5) Blakely Ave at Scatchet Head, and (6) Blakely Ave at Swede Hill Rd. As

this project involves the installing a water system, the completed project will not generate additional traffic in the community or cause a negative impact to the transportation system.

3.11.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to transportation. There will be no anticipated significant impacts on transportation resources resulting from the construction, operation, or maintenance.

3.11.3 Mitigation

None proposed.

3.12 Aesthetics

3.12.1 Affected Environment

Areas where trenching moves soil and vegetation will revegetate naturally following disturbance. Project is planned to minimize disruption of existing vegetation.

3.12.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to surrounding aesthetics. There will be no anticipated significant impacts on aesthetic resources resulting from the construction, operation, or maintenance.

3.12.3 Mitigation

None proposed.

3.13 Human Health and Safety

3.13.1 Environmental Risk Management

3.13.1.1 Affected Environment

This project entails the installation of a water system. No adverse human health or environmental issues will result from this project.

3.13.1.2 Environmental Consequences

The Proposed Action is not expected to impose significant impacts to surrounding human health and safety issues. There will be no anticipated significant impacts on these issues resulting from the construction, operation, or maintenance.

3.13.1.3 Mitigation

None proposed.

3.14 Corridor Analysis

The Proposed Action does not require a Corridor Analysis; therefore, this section is not applicable.

4.0 CUMULATIVE EFFECTS

The Proposed Action will replace failing components of a water system. The water system owner has an obligation to serve the existing users and all potential lots within the service area. The system is not expanding the service area as part of this project. Therefore, this project will not impact growth in the area or create additional buildable lots.

5.0 SUMMARY OF MITIGATION

- 1. Include a contract specification to control dust and noise during construction. Equipment shall not be operated without proper mufflers or other noise suppressers as appropriate for the type of equipment involved.
- 2. During construction, working hours will be during daylight hours only. Pipe trenching sections will be filled at the end of each working day so as not to leave any night driving hazards. The Engineer will be empowered to either shut down construction or to demand corrective action when any construction practices unduly endanger the public or the environment.
- 3. Construction hours to be monitored. Normal construction hours to be Monday through Friday, not to exceed 7:00am to 5:00pm (or daylight hours depending on County restrictions).
- 4. All Island County requirements for Buffer Zones and landscaping at project site shall be included in plans and specs and must be approved by RD and local jurisdiction prior to construction.
- 5. Berming will be utilized to guard against excess surface runoff and erosion entering off site area. Grass swales will be placed to control surface runoff and erosion. Cuts will be kept to a minimum and fills will not be required. Storm water run-off from roofs and storm surfaces will be collected in oil and water separators before discharge will be directed to drainage swales. Site grading will provide for surface run-off as required by Island County building requirements.
- 6. Unanticipated Discovery Plan (UDP) must be "in place" before Notice to Proceed is issued. If earth disturbing activities during project construction uncover cultural materials (i.e. structural remains, historic artifacts, or prehistoric artifacts), all work shall cease and the Washington State Archeologist at the Office of Archeology and Historic Preservation (OAHP), Swinomish Tribe, and Rural Development (RD) State Environmental Coordinator (SEC) shall be notified immediately.

If earth disturbing activities during any area of the project uncover human remains, all work shall cease immediately in accordance with the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) and state statues RCW 27.44. The area around the discovery shall be secured and the County Coroner, and the State Archeologist at OAHP shall be notified immediately. The State Archeologist shall notify the Tribe and the SEC at RD without delay.

6.0 COORDINATION, CONSULTATION AND CORRESPONDENCE

Impact evaluation and analysis requires coordination and consultation with Federal or State environmental regulatory or natural resource agencies. All correspondence related to this coordination included USDA RD Environmental Specialist, Paul Johnson, and the Community Program Specialist, Darla O'Connor.

7.0 LIST OF PREPARERS

Name: Robert Bennion, P.E. Title: Civil Engineer Affiliation: Davido Consulting Group, Inc. Areas of Input: Project Manager, QA/QC Name: Nicole Foster Title: Senior Environmental Scientist Affiliation: Davido Consulting Group, Inc. Areas of Input: Authored main body of document



Appendix A – Site Plan

Scatchet Head Water District



5/7/2	5/7/2019, 3:43:39 PM					
Plats						
	Plat Existing Service Area					
	Parcels					
l	Quarter Sections					
+	One Way Directions					



Roads

Highway

- Collector and Arterial
- Local
- -- Private



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/ Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community Island County

Island County Parcel Viewer Map Export

Proposed Distribution System Improvements





Appendix B – IPaC Results

IPaC

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.



Local office

Washington Fish And Wildlife Office

(360) 753-9440
(360) 753-9405

510 Desmond Drive Se, Suite 102 Lacey, WA 98503-1263

http://www.fws.gov/wafwo/

https://ecos.fws.gov/ipac/location/VCFLGK7YYFCS5ASX6PG6HMMDDI/resources

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

- 1. Draw the project location and click CONTINUE.
- 2. Click DEFINE PROJECT.
- 3. Log in (if directed to do so).
- 4. Provide a name and description for your project.
- 5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the <u>Ecological Services Program</u> of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact <u>NOAA</u> <u>Fisheries</u> for <u>species under their jurisdiction</u>.

- 1. Species listed under the <u>Endangered Species Act</u> are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the <u>listing status page</u> for more information.
- 2. <u>NOAA Fisheries</u>, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Birds

NAME	STATUS
Marbled Murrelet Brachyramphus marmoratus There is final critical habitat for this species. Your location is outside the critical habitat. <u>https://ecos.fws.gov/ecp/species/4467</u>	Threatened
Streaked Horned Lark Eremophila alpestris strigata	Threatened
There is final critical habitat for this species. Your location is outside the critical habitat. <u>https://ecos.fws.gov/ecp/species/7268</u>	, TAI
Yellow-billed Cuckoo Coccyzus americanus	Threatened
There is proposed critical habitat for this species. Your location is outside the critical	
habitat.	P
https://ecos.tws.gov/ecp/species/3911	
Fishes C V	
NAME	STATUS
Bull Trout Salvelinus confluentus	Threatened
There is final critical habitat for this species. Your location is outside the critical habitat.	
https://ecos.fws.gov/ecp/species/8212	

Flowering Plants

NAME

STATUS

Golden Paintbrush Castilleja levisecta No critical habitat has been designated for this species. <u>https://ecos.fws.gov/ecp/species/7706</u> Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described <u>below</u>.

- 1. The Migratory Birds Treaty Act of 1918.
- 2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <u>http://www.fws.gov/birds/management/managed-species/</u> <u>birds-of-conservation-concern.php</u>
- Measures for avoiding and minimizing impacts to birds <u>http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/</u>

conservation-measures.php

 Nationwide conservation measures for birds <u>http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf</u>

The birds listed below are birds of particular concern either because they occur on the <u>USFWS Birds of Conservation Concern</u> (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ <u>below</u>. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the <u>E-bird data mapping tool</u> (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found <u>below</u>.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME

Bald Eagle Haliaeetus leucocephalus

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626

Great Blue Heron Ardea herodias fannini This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

Breeds Jan 1 to Sep 30

Breeds Mar 15 to Aug 15

Breeds May 20 to Aug 31

Breeds elsewhere

Breeds Apr 15 to Jul 15

Olive-sided Flycatcher Contopus cooperi

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

https://ecos.fws.gov/ecp/species/3914

Red-throated Loon Gavia stellata

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

Rufous Hummingbird selasphorus rufus

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8002

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

- 2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
- 3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (=)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (--)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



IPaC: Explore Location

Bald Eagle Non-BCC Vulnerable (This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.)	11						1 - 1		+1+1	1111	11+1	
Great Blue Heron BCC - BCR (This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA)	111-	+	+ 11.	-1-+		1 - 1	1		111	1111	.	 - N
Olive-sided Flycatcher BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)	++	-+++	+++	-+-+	-	11	+		 K		He-	<u>)</u>
Red-throated Loon BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)	+	-+11	• + •	- I -+	+		S	77	+++1	++++	+++"	++
Rufous Hummingbird BCC Rangewide (CON) (This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)	++	+++			y	y n t	1+		++++	++++	++++	++

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. <u>Additional</u> <u>measures</u> and/or <u>permits</u> may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS <u>Birds of Conservation Concern (BCC)</u> and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the <u>Avian Knowledge Network (AKN)</u>. The AKN data is based on a growing collection of <u>survey, banding, and citizen science datasets</u> and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (<u>Eagle Act</u> requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the <u>AKN Phenology Tool</u>.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the <u>Avian Knowledge Network (AKN)</u>. This data is derived from a growing collection of <u>survey, banding, and citizen science datasets</u>.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: <u>The Cornell Lab of Ornithology All About Birds Bird Guide</u>, or (if you are unsuccessful in locating the bird of interest there), the <u>Cornell Lab of Ornithology Neotropical Birds guide</u>. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

- 1. "BCC Rangewide" birds are <u>Birds of Conservation Concern</u> (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
- 2. "BCC BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
- 3. "Non-BCC Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the <u>Eagle Act</u> requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore

energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the <u>Northeast Ocean Data Portal</u>. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the <u>NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.</u>

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the <u>Diving Bird Study</u> and the <u>nanotag studies</u> or contact <u>Caleb Spiegel</u> or <u>Pam Loring</u>.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to <u>obtain a permit</u> to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the <u>National Wildlife Refuge</u> system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.



Wetlands in the National Wetlands Inventory

Impacts to <u>NWI wetlands</u> and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

ESTUARINE AND MARINE WETLAND

E2AB/USN

RIVERINE

A full description for each wetland code can be found at the National Wetlands Inventory website

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.



Appendix C - Sole Source Aquifer Checklist



February 22, 2021

SOLE SOURCE AQUIFER CHECKLIST

1. Location and name of Sole Source Aquifer or Source Area.

Location: Scatchet Head Water District (SHWD) on southern Whidbey Island between Cultus Bay and Useless Bay

Name of Sole Source Aquifer or Source Area: Whidbey Island Aquifer Area SSA

2. Project description.

The SHWD (Water System Identification 76470 X) is a Group A Community water system currently providing potable water to 413 connections including 4 non-residential connections within its service area. The SHWD's distribution system is served by 2 groundwater wells. The system is currently hampered by deferred maintenance. Through a system analysis and information provided in the Water System Plan completed in 2020, the District has determined that many of the components of the water treatment and distribution system have reached or exceeded the end of their useful life. These components include asbestos cement (AC) water mains, source pumps, treatment system components, and associated valves that have surpassed their anticipated useful life.

The existing AC piping in the distribution system were installed in 1958 and have exceeded their useful life of approximately 50-years, depending on pipe condition. There have been several recent leaks in the distribution system that have required repairs. This is a particular concern for the system in locations of steep slopes and areas where landslides have or may occur. The district is prioritizing the replacement of the AC water mains that are located near or along steep slopes and those sections of pipes that have a history of leaks and repairs.

Both wells are located on parcel number S8110-00-12018-2. Both wells have pumps and meters that were installed in 1995 and 1997, respectively. Submersible well pumps and meters have an anticipated useful life of 10 to 15 years. Both the submersible well pumps and source meters are at or have surpassed their anticipated useful life and will need to be replaced. There is additional piping in the well house that needs to be replaced and sized in accordance with state standards.

The treatment facility filter media has surpassed its useful life and is not efficiently removing iron and manganese. As a result, the system requires frequent backwashing which uses about 40,000 gallons of treated water a month or 15% of the treated water produced. The large volume of backwash water is also overwhelming the onsite infiltration area. In addition to replacing the filter media, the pumphouse has experienced leaking and a deterioration of the ductile iron piping within the building in the past few years due to oxidation which has occurred from off-gassing from chloring tanks stored in the pumphouse which needs to be replaced.

Given these factors, SHWD is seeking funding from the USDA to ensure continued safe drinking water to this island community.

Mount Vernon 2210 Riverside Dr, Suite 110 Mount Vernon, WA 98273 tel 360.899.1110 Federal Way 31620 23rd Ave S, Suite 307 Federal Way, WA 98003 tel 206.523.0024

3. Is there any increase of impervious surface? If so, what is the area?

No.

4. Describe how storm water is currently treated on the site?

The water system currently has a pumphouse, wellhouse, and two reservoirs associated with the water system. Roof runoff is dispersed on site in an unconcentrated manner allowing for infiltration.

5. How will storm water be treated on this site during construction and after the project is complete?

Silt fencing and other best management practices will be utilized during installation of the waterline, including limiting the amount of open ditch and exposed earth.

Trench area will be seeded and return to original condition. No need for long term stormwater treatment.

6. Are there any underground storage tanks present or to be installed? Include details of such tanks.

No.

7. Will there be any liquid or solid waste generated? If so how will it be disposed of?

The systems existing treatment system will have filter media replaced as part of the project. The filters are backflushed with water as necessary to refresh the media. The backflush water is discharged into a temporary detention pond located onsite with the pumphouse. The water in the storage pond is used to irrigate vegetation on a neighboring parcel.

8. What is the depth of excavation?

Standard waterline trench depth of approximately 48 inches.

9. Are there any wells in the area that may provide direct routes for contaminates to access the aquifer and how close are they to the project?

The SHWD's distribution system is served by 2 groundwater wells. Both wells are located on parcel number S8110-00-12018-2. Both wells have pumps and meters that were installed in 1995 and 1997, respectively.

10. Are there any hazardous waste sites in the project area....especially if the waste site has an underground plume with monitoring wells that may be disturbed? Include details.

There are no know hazardous waste sites with a mile of this project.

11. Are there any deep pilings that may provide access to the aquifer?

No deep pilings exist or will be installed.

12. Are Best Management Practices planned to address any possible risks or concerns?

Yes, best management practices will be used during the installation of this project and qualified professionals will be utilized for the installation.

13. Is there any other information that could be helpful in determining if this project may have an affect on the aquifer?

No.

14. Does this Project include any improvements that may be beneficial to the aquifer, such as improvements to the wastewater treatment plan?

Currently the water system has been experiencing an excess number of leaks from aging water mains. The installation of new water mains will reduce the demand on the system's lone well helping to reduce localized drawdown of the aquifer.

The EPA Sole Source Aquifer Program may request additional information if impacts to the aquifer are questionable after this information is submitted for review.



Appendix D – CZMA Consistency Determination Letter



February 22, 2021

Washington State Department of Ecology Attn: Loree Randall, Federal Permits/SEA Name 300 Desmond Drive Lacey, WA 98503

Re: Consistency Determination for Submittal Under CZMA

Dear Loree Randall,

This document presents the State of Washington with the USDA Rural Utilities Service's, hereafter referred to as the Agency, Section 307 and Title 15 CFR Part 930, Subpart C, for implementation of our applicant's proposal to install a supplemental well and supporting utilities located at:

Address: N/A. Scatchet Head Water District (SHWD) on southern Whidbey Island between Cultus Bay and Useless Bay.

County: Island County

Sec/Twn/Rng:

Map ID 694: 9/28/3E

Map ID 697: 10/28/3E

Map ID 699: 10/28/3E

Map ID 712: 15/28/3E

Map ID 713: 15/28/3E

Map ID 715: 16/28/3E

Quarter: Whidbey. See Map IDs above.

Legal Description: N/A

See Attachment I – Site Plan for further information.

Our applicant, David Mullins of SHWD (Attachment II – Contact Information), has requested guaranteed loan funds for the proposed project and has prepared and provided environmental documentation to allow the Agency to evaluate the potential environmental impacts from the proposed project in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 U.S. Code 4321-4347).

Under the proposed action, the applicant would replace existing distribution water mains. Construction is anticipated to occur in 2022 with a duration of approximately four months. The SHWD's distribution system is served by 2 groundwater wells. The system is currently hampered by deferred maintenance. Through a system analysis and information provided in the Water System Plan completed in 2020, the District has determined that many of the components of the water treatment and distribution system have reached or exceeded the end of their useful life. These components include asbestos cement (AC) water mains, source pumps, treatment system components, and associated valves. Given these factors, SHWD is seeking funding from the USDA to ensure continued safe drinking water to this island community.

Mount Vernon 2210 Riverside Dr, Suite 110 Mount Vernon, WA 98273 tel 360.899.1110

Federal Way 31620 23rd Ave S, Suite 307 Federal Way, WA 98003 tel 206.523.0024

EFFECTS TO RESOURCES

The Agency has determined that proposed action would affect the land, water uses, and natural resources of Washington in the following manner:

Water Quantity: Surface and subsurface water quality in the area is generally considered adequate. An expansion to the existing water right is not needed at this time.

The Proposed Action is not expected to impose significant impacts to surrounding water quantity as the desired capacity is not greater than the current withdrawal rate. Additionally, no downstream affects are anticipated as no additional groundwater will be accessed. There will be no anticipated significant impacts on water resources resulting from the construction, operation, or maintenance.

Water Quality: The project site is located in a sole source aquifer per the Designated Sole Source Aquifers mapper (Appendix D - Sole Source Aquifer Checklist). The project is not part of a State or Federally mandated cleanup effort and there has not been, nor are there currently, violations of State water statutes or wastewater discharge permits.

The Proposed Action is not expected to impose significant impacts to surrounding water quality. There will be no anticipated significant impacts on water resources resulting from the construction, operation, or maintenance.

See Attachment III - Certification of CZMA Consistency for further information.

CONSISTENCY DETERMINATION

The Washington Coastal Zone Management Program contains the following applicable enforceable policies:

- (1) When the state of Washington and local governments develop plans for the management, conservation, use, or development of natural resources in Washington's coastal waters, the policies in RCW 43.143.010 shall guide the decision-making process.
- (2) Uses or activities that require federal, state, or local government permits or other approvals and that will adversely impact renewable resources, marine life, fishing, aquaculture, recreation, navigation, air or water quality, or other existing ocean or coastal uses, may be permitted only if the criteria below are met or exceeded:
 - (a) There is a demonstrated significant local, state, or national need for the proposed use or activity;
 - (b) There is no reasonable alternative to meet the public need for the proposed use or activity;
 - (c) There will be no likely long-term significant adverse impacts to coastal or marine resources or uses;
 - (d) All reasonable steps are taken to avoid and minimize adverse environmental impacts, with special protection provided for the marine life and resources of the Columbia river, Willapa Bay and Grays Harbor estuaries, and Olympic national park;
 - (e) All reasonable steps are taken to avoid and minimize adverse social and economic impacts, including impacts on aquaculture, recreation, tourism, navigation, air quality, and recreational, commercial, and tribal fishing;
 - (f) Compensation is provided to mitigate adverse impacts to coastal resources or uses;
 - (g) Plans and sufficient performance bonding are provided to ensure that the site will be rehabilitated after the use or activity is completed; and
 - (h) The use or activity complies with all applicable local, state, and federal laws and regulations.

Based upon the following information, data, and analysis, the Agency finds that the proposed project's activities are consistent to the maximum extent practicable with the enforceable policies of the Washington's Coastal Zone Management Program. The following is a summary of the Agency's analysis supporting this determination:

Washington State Department of Ecology, Federal Permits/SEA February 22, 2021

- (a) Significant local need demonstrated;
- (b) No reasonable alternative exists to meet the public need for the proposed activity;
- (c) No long-term significant adverse impacts to coastal or marine resources or uses will occur;
- (d) All reasonable steps have been taken to avoid and minimize adverse environmental impacts;
- (e) All reasonable steps have been taken to avoid and minimize adverse social and economic impacts;
- (f) Compensation is not proposed;
- (g) Plans and sufficient performance bonding are provided; and
- (h) The activity complies with all applicable local, state, and federal laws and regulations.

Pursuant to 15 CFR Section 930.41, the Washington Coastal Zone Management Program has 60 days from the receipt of this letter in which to concur with or object to this Consistency Determination, or to request an extension under 15 CFR Section 930.41(b). Washington's concurrence will be presumed if its response is not received by the Agency on the 60th day from receipt of this determination. The State's response should be sent to:

USDA Rural Development Attn: Paul Johnson 1835 Black Lake Blvd SW, Suite B Olympia, WA 98512 (360) 704-7761

If you need additional information, or if you have any questions, please do not hesitate to call me at (206) 523-0024 x144, or email me at nicole@dcgengr.com. Thank you very much for your assistance.

Sincerely,

Davido Consulting Group, Inc.

Nicole Foster Senior Environmental Scientist



Attachment I – Site Plan

Scatchet Head Water District



5/7/2	5/7/2019, 3:43:39 PM					
Plats						
	Plat Existing Service Area					
	Parcels					
l	Quarter Sections					
+	One Way Directions					



Roads

Highway

- Collector and Arterial
- Local
- -- Private



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/ Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community Island County

Island County Parcel Viewer Map Export

Proposed Distribution System Improvements





Attachment II – Contact Information



Table 1. Contact Information

Applicant	Applicant's Agent	USDA Environmental Specialist		
Scatchet Head Water District	Davido Consulting Group, Inc.	USDA Rural Development		
Attn: David Mullins	Attn: Robert Bennion, PE	Attn: Paul Johnson		
7906 Guemes Ave	P.O. Box 1132	1835 Black Lake Blvd SW, Suite B		
Clinton, WA 98236	Freeland, WA 98249	Olympia, WA 98512		
(206) 794-4747	(360) 331-4131	(360) 704-7761		



Attachment III - Certification of CZMA Consistency



CERTIFICATION OF CONSISTENCY WITH WASHINGTON'S COASTAL ZONE MANAGEMENT PROGRAM FOR ACTIVITIES FUNDED BY RURAL DEVELOPMENT (USDA/RD)

Federal Application Number:

Applicant: Scatchet Head Water District, Attn: Edward Schoeler

Project Description: Water system replacement

(attach site plans, location (county/city), and proximity to waterbody (name)) or JARPA Application

This action under CZMA§307(c)(3) is for a project, which will take place within Washington's coastal zone, or which will affect a land use, water use, or natural resource of the coastal zone. (*The coastal zone includes Clallam, Grays Harbor, Island, Jefferson, King, Kitsap, Mason, Pacific, Pierce, San Juan, Skagit, Snohomish, Thurston, Wahkiakum and Whatcom counties.*)

The project complies with the following enforceable policies of the Coastal Zone Management Program:

1.	Shoreline Management Act:					
	Is outside of SMA jurisdiction		×			
	Applied for shoreline permit		()#	being reviewe	d by	
	Has a valid shoreline permit		()#	issued by	0n	
	Has received an SMA Exemption		()#	issued by	0n	
2.	State Water Quality Requirements:					
	Does not require water quality permits		X			
	Applied for water quality certification		0			
	Has received water quality certification		()#	issu	ed on	
	Applied for stormwater permit	()#	issued on			
Has received stormwater permit	()#issued o		ied on			
3.	State Air Quality Requirements:					
	Does not require air quality permits		X			
	Applied for Air Quality permit	()#		being reviewed by		
	Has an Air Quality permit	·· —	()#	issued by	on	
			···			
4.	State Environmental Policy Act:		SEPA Lead	Agency is:		
	Project is exempt from SEPA		Ø	· ·		
	SEPA checklist submitted		() date			
	SEPA decision issued/adopted		()DNS ()M	DNS ()EIS ()Other	date	
	NEPA decision adopted by		()SEPA #		date	
	Lead agency to satisfy SEPA					
Pub	lic Notice for this proposed project was p	rovided t	through:			
()	atian mailed to interacted particle using			iling list on	(data)	
()	blication in	(noweno)	IIIa		(dates)	
Opt	hor (include dates)	(newspa	per) on		_(uales)	
()01	ner (menude dates)					
The be c	refore, I certify that this project complies w onducted in a manner consistent with such	ith the er program	nforceable polic 1.	ies of Washington's appl	roved coastal zone n	nanagement program and will
(Sig	nature)				Date	
USI Mai	DA, Rural Development concludes this act nagement Program.	ion is co	nsistent to the n	naximum extent practic	able with Washing	ton's Coastal Zone

Funds will not be released until all State Agency requirements have been met.

(Signature)_____ Date _____

If you require this publication in an alternate format, please contact the Shorelands and Environmental Assistance Program at 360-407-6096, or TTY (for the speech or hearing impaired) 711 or 800-833-6388.