

TECHNICAL MEMORANDUM

TO: Bill McCarthy - Kennedy/Jenks
Amy Blain – City of Longview

FROM: Theresa Turpin

DATE: March 7, 2011

RE: **PIPELINE AMENDMENT FOR MINT FARM REGIONAL WATER TREATMENT PLANT**

INTRODUCTION

NEPA Amendment for the Finding of No Significant Impact (FONSI) for the City of Longview Mint Farm Regional Water Treatment Plant Longview, Cowlitz County, Washington

A Finding of No Significant Impact (FONSI) for the City of Longview Mint Farm Regional Water Treatment Plant, Longview, Cowlitz County, Washington, was issued by the Environmental Protection Agency (EPA) on August 13, 2010. The purpose and need of this action has not changed, the regional water treatment plant is still in the construction phase. This amendment is being issued due to a change in the alignment of the water transmission main. Originally, the transmission main was planned to be on the east side of the wetland mitigation area adjacent to the existing railway tracks. Due to easement acquisition difficulties, it became necessary to seek an alternative alignment. Therefore the transmission main alignment was shifted to the west side of the wetland mitigation site along a City-owned 20-ft easement currently used to access the wetland mitigation site. The water transmission main alignment (alignment) will be moved to the west side of the wetland mitigation area (see attached maps).

Design Update - Water Transmission Main

With the exception of the location, the details of the water transmission main as described in the Environmental Information (EID) remains the same. The water transmission main will be approximately 6,000 linear feet of 30-inch diameter ductile iron pipe and a new 12-inch spur will connect to an existing 12-inch diameter line located to the east of the new 30-inch diameter transmission main. The new alignment will connect to the existing 20-inch diameter water main located to the north, in the vicinity of the intersection between Olive Way and Ocean Beach Highway. The transmission main traverses mainly undeveloped areas, avoiding the existing wetland mitigation area. Environmental impacts from the change in the water transmission main alignment are anticipated to be the same or less than the original proposal as the alignment between the railroad and the existing wetland mitigation area provided limited

space. The construction area for the new alignment is within a 20-ft access easement adjacent to the existing wetland mitigation site.

Coordination with other agencies

Endangered Species Act and Magnuson-Stevens Act

Information for Endangered Species Act (ESA) compliance would remain the same for the alignment change. The alignment is located in a manufacturing zone and potential impacts from construction would be short term and negligible. The alignment remains within the action area reviewed for ESA. As stated in the FONSI, “There will be no new or increased discharge of pollutants, no in-water work, and standard best management practices (BMPs) for erosion and sediment control shall be binding grant conditions on the grantee.” No impacts will occur to ESA-listed species or critical habitats and there is no essential fish habitat in the area. The FONSI remains the same.

Executive Order 11988 Flood Plain Management

The alignment still is within the area designated as Zone X on the Federal Emergency Management Agency’s Flood Insurance Rate Map – Community Panel 5300340005D. There will be no construction impacts within areas zoned as high flood hazard; therefore, the assessment in the FONSI that no review under EO 11988 will be required remains the same.

Section 106 of the National Historic Preservation Act- Archaeological and Cultural Resources

Equinox Research and Consulting International (ERCI) has provided Archaeological and Historical Monitoring for the recent preload work on the Longview RWTP site. Several investigations have been conducted on the site and these have also been reviewed by ERCI. This work does expand the Area of Potential Effect (APE); however, area portion of the expanded APE (the wetland mitigation site) was investigated as part of the wetland mitigation phase of the project by Archaeology Investigations Northwest (AINW) (McCormick 2008). Based on ERCI site experience, the amount of fill encountered, and the past site archaeological investigations, ERCI recommends:

1. Any additional phases of this or future projects in or adjacent to the project area monitored during the pre-loading for this project should be reviewed by a professional archaeologist in order to determine if additional field investigations, professional archaeological monitoring or an updated Unanticipated Discoveries Protocol and training should be required.

2. If, after review by a professional archaeologist, it is determined that archaeological monitoring is not required for any reviewed projects, then a brief onsite training of the construction crew based on the

attached Unanticipated Discovery Plan (UDP) must be held and a copy of the UDP should be kept on site at all times.

We are anticipating the alignment will be reviewed by ERCI and their site recommendations will be followed to provide compliance with Section 106, we are anticipating based on their past experience and past documentation on the site, they will require UDP training and UDP on site.

Coastal Zone Management Act

As stated in the FONSI, the Coastal Zone Management Act does not apply.

Executive Order 11990 – Wetlands

The alignment was originally proposed on the east side of the mitigation site. That area was limited since construction would have been between the railroad and the wetland mitigation site. With the alignment changing to the west of the wetland mitigation site and also having a 20-ft easement, the construction of the alignment is not as limited. There will be no fill of any wetland areas and the construction will avoid any impacts to the existing wetland mitigation site. This will not change the FONSI.

Wild and Scenic Rivers Act

There are no wild and scenic rivers in Cowlitz County.

Clean Air Act – Conformity Analysis

Project is not located in an area designated as a non-attainment or maintenance area.

Mitigation and Monitoring Measures

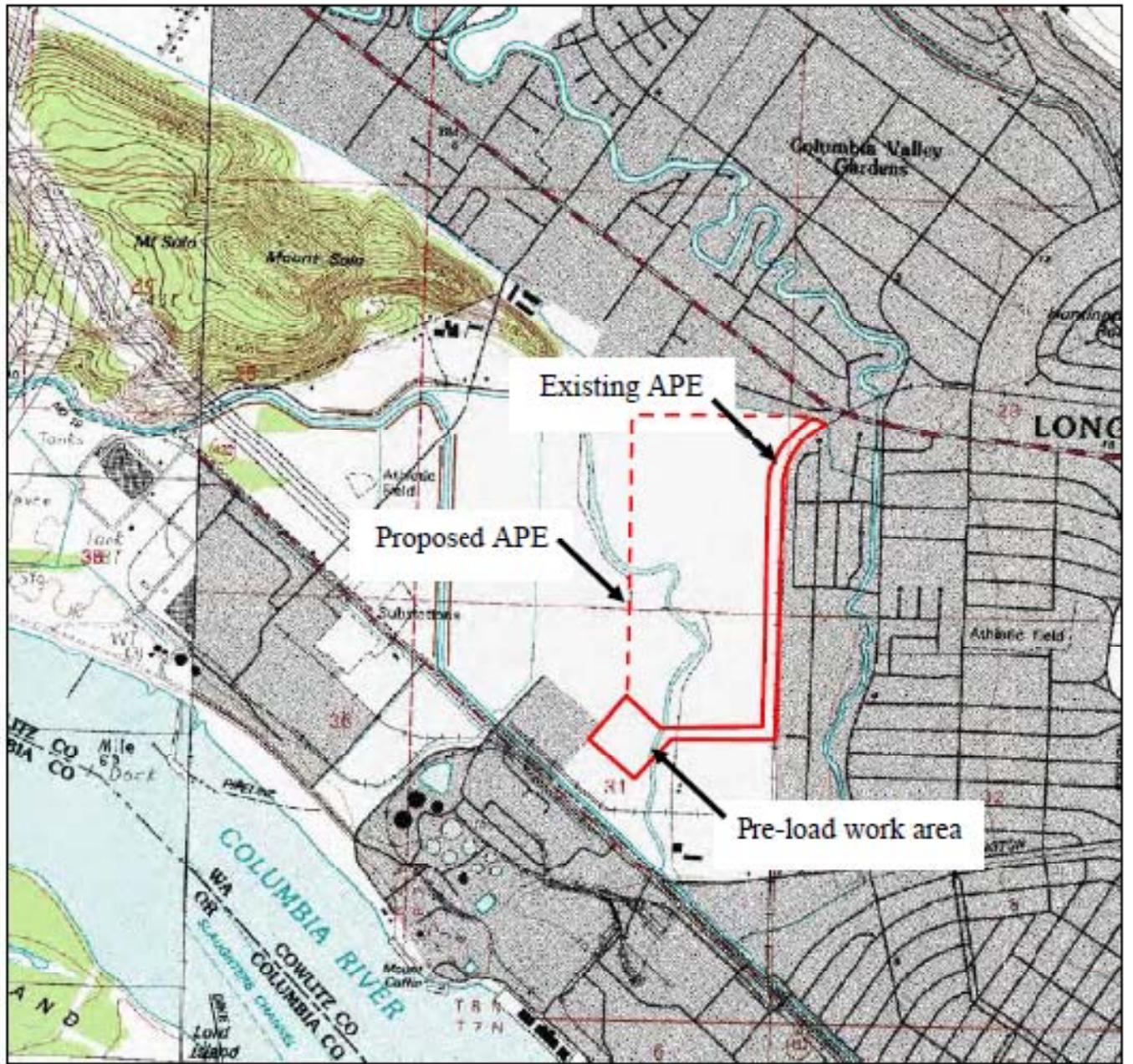
All mitigation and monitoring measures remain the same as the originally-issued FONSI. After the archaeological review, there is a potential that a UDP training will be required instead of site monitoring. As part of these measures, recommendations by the archaeologist will be adhered to whether it is training or monitoring.

The only change to the project is shifting the alignment from the east side of the wetland mitigation area to the west side of the project area. The change does not create any impacts that have not been already discussed and reviewed in the EID. Therefore, although the project changes slightly, the change does not increase the environmental impacts of the project; therefore EPA's FONSI determination should remain.

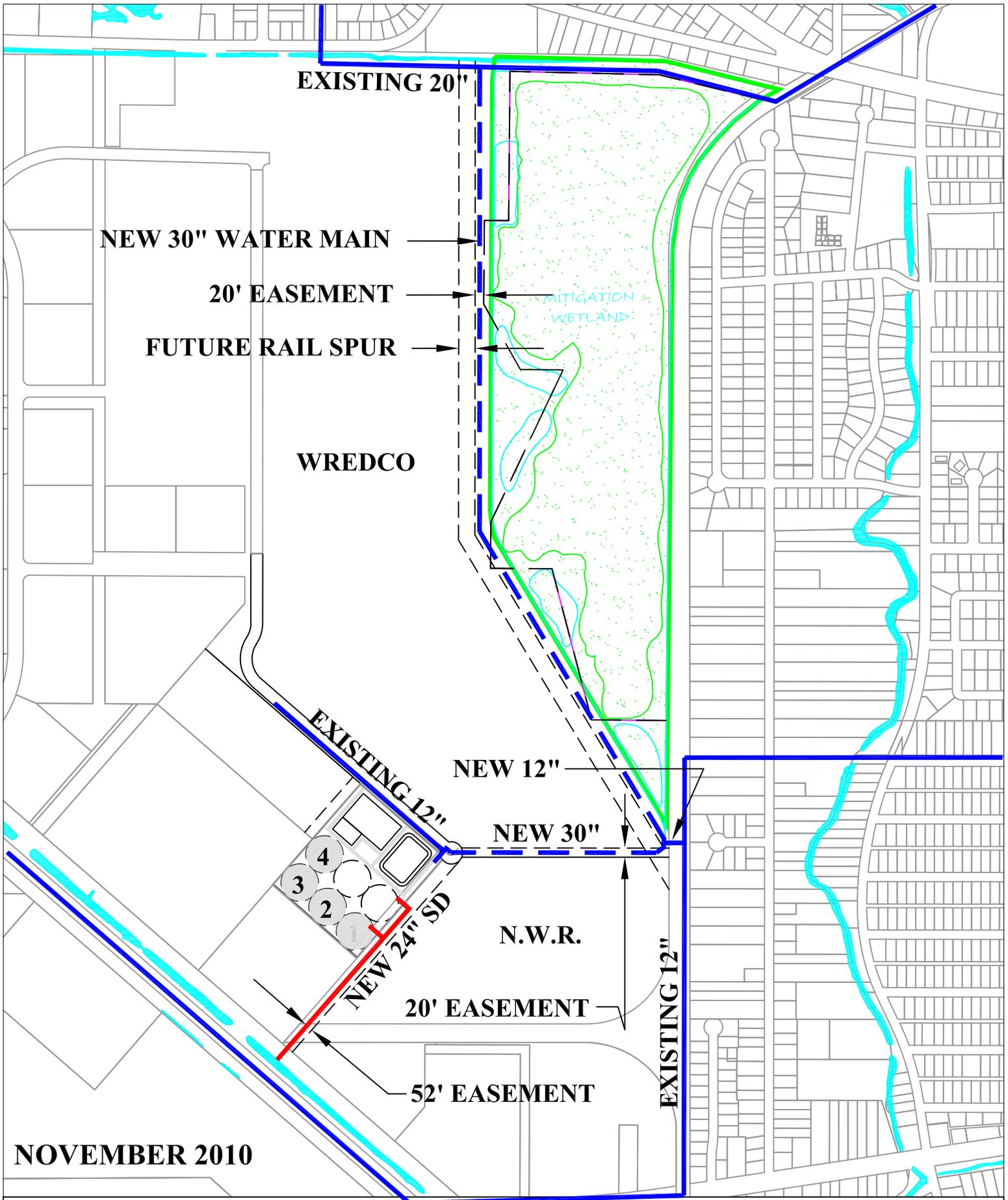
REFERENCE

McCormick, Erica D., M.Sc., R. Todd Baker, M.A., and John L. Fagan, Ph.D., RPA. *Memo: Results of Monitoring for the Mint Farm Wetland Mitigation Project, AINW Report No. 1772 #1350563*. Archaeological Investigations Northwest, Inc. prepared for Nelson Graham. July 23.

Attachments: Figure 1 - Revised Area of Potential Effect
Mint Farm Regional Water Treatment Facility Project Map



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NOVEMBER 2010

**CITY OF LONGVIEW
MINT FARM REGIONAL WATER TREATMENT FACILITY**