



February 16, 2022

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

and

Deception Park View Water System
Attn: Kathleen Johnson
PO Box 2446
Oak Harbor, WA 98277

Re: **ENVIRONMENTAL ASSESSMENT FOR NATIONAL ENVIRONMENTAL POLICY ACT (NEPA) REVIEW**
Deception Park View Water System Improvements Project
Whidbey Island, WA

Dear Paul Johnson and Kathleen Johnson,

Davido Consulting Group (DCG) is pleased to present the attached Environmental Report for the proposed Deception Park View (DPV) 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. DPV will be the recipient of the funds.

This report was compiled using information provided by DPV (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 Jeff Tasoff of DCG at (206) 360-4131 ext 302 or jeff@dcgengr.com.

Sincerely,

Jeff Tasoff, P.E.
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ACRONYMS AND ABBREVIATIONS

CZMA	Coastal Zone Management Act
DCG	Davido Consulting Group, Inc.
EA	Environmental Assessment
gpm	Gallons per Minute
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
DPV	Deception Park View
UDP	Unanticipated Discovery Plan
USDA	United States Department of Agriculture
WDFW	Washington Department of Fish and Wildlife

**ENVIRONMENTAL REPORT FOR THE DECEPTION PARK VIEW
WATER SYSTEM IMPROVEMENTS PROJECT**

Table 1. Contact Information

Applicant	Applicant's Agent	USDA Environmental Specialist
Deception Park View Water System Attn: Kathleen Johnson PO Box 2446 Oak Harbor, WA 98277 (360) 675-6252	Davidco Consulting Group, Inc. Attn: Jeff Tasoff, PE P.O. Box 1132 Freeland, WA 98249 (206) 360-4131 ext 302	USDA Rural Development Attn: Paul Johnson 1835 Black Lake Blvd SW, Suite B Olympia, WA 98512 (360) 704-7761

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 Deception Park View (DPV) Water System (Water System ID 18305H) The bulk of the improvements will be related to installing a new distribution system for the community, including new 6" mains, new water meters and water service connections from the main to the meters, and all other required appurtenances. Additional minor improvements will be made to the pump house and well site including a new well cover structure, two additional pumps, isolated chlorination room, and some grading around the grounds to improve access. The project is located in Oak Harbor, WA just south of Deception Pass State Park.

1.2 Purpose and Need

The DPV neighborhood needs an upgrade to their water distribution system to reduce system water losses and ensure continued service to customers. An analysis of the rest of the system was preformed to determine if there was any ageing infrastructure that may prevent the system from functioning into the foreseeable future. This analysis determined that one of the existing reservoirs and the primary well are approaching the end of their anticipated lifespan. The community has been informed that these upgrades may need to be made in the relatively near future.

The DPV subdivision has a Group A Community water system that is currently providing potable water to 73 homes with an approved capacity of 100 connections. The DPV's distribution system is served by 1 active groundwater well and 1 inactive well for emergency use. Well #2 was drilled in 1975 and has an expected lifespan of 60 years. The system has two water reservoirs, one constructed in 1976 and the other in 2001. With an expected lifespan of 60 years, the older reservoir is approaching the end of its anticipated useful lifespan. The pressure tanks, one booster pump, and treatment system were all installed in the

2010's (the other existing booster pump was installed in 2013) and are functioning adequately although existing the booster pumps are not adequately sized to provide the desired fire flow. The distribution system after leaving the reservoirs consists of 4" AC watermain. The 4" watermains do not meet current design standards for distribution systems and are aging. Given these factors, the system is seeking funding from the USDA to ensure continued safe drinking water to the community. Funding is needed to install 6" distribution mains, water services and meters, provide two additional booster pumps, and complete minor grounds improvements near the pump house and reservoirs.

1.2.1 Health, Sanitation and Security

In the existing conditions, the DPV water system is facing losses of greater than 10% which puts the system at risk for contamination and the booster pumps are not sized to provide adequate fire flow. Improving the distribution system and adding additional pumps will reduce these risks.

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. Some of the system components are at or are nearing the end of their useful life. The system has an average loss of greater than 10% over the last 3 years, which is characteristic of deteriorating infrastructure. The current well cover structure is also in disrepair and should be replaced.

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. 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 70,000 gallons and can provide the necessary storage for fire flow.

While Island County does not require these standards to be met for this subdivision, it is a goal of the community to provide fire flow. Adding two additional pumps (5 HP Goulds Model 3656) along with upsizing the distribution pipes to 6" mains will allow for the standard fire flow requirements to be met.

2.0 ALTERNATIVES EVALUATED INCLUDING THE PROPOSED ACTION

Four 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 DPV 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.

Table 2: Distribution System Alternatives Evaluated

Alternative	Evaluation Criteria	Performance
Alternative 1 Open Trench Replacement	Ability to Maintain Water Service During Construction	Water service to the DPV's consumers during construction can be maintained with a short shutoff occurring as the connection is switched over to the new water main.
	Annual O&M Requirements	Normal O&M requirements expected
	Contaminated Water Intrusion Risk	Unlikely
	Lifespan	60 years
	Maintenance/Shutdowns	Normal maintenance and shutdowns expected
	Replacement Cost	Low
Alternative 2 Directional Drilling	Ability to Maintain Water Service During Construction	Water service to the DPV's consumers during construction can be maintained with a short shutoff occurring as the connection is switched over to the new water main.
	Annual O&M Requirements	Normal O&M requirements expected
	Contaminated Water Intrusion Risk	Unlikely
	Lifespan	60 years
	Maintenance/Shutdowns	Normal maintenance and shutdowns expected
	Replacement Cost	High
Alternative 3 Pipe Bursting	Ability to Maintain Water Service During Construction	No, existing mains must be shut down during the entirety of construction
	Annual O&M Requirements	Normal O&M requirements expected
	Contaminated Water Intrusion Risk	Unlikely
	Lifespan	60 years
	Maintenance/Shutdowns	Normal maintenance and shutdowns expected
	Replacement Cost	Medium
Alternative 4 No Action	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
	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: Alternative 1

Based upon the goals of the system, evaluation criteria, and the long-term viability of the water system, the selected alternative is to use a standard open trench installation (Alternative 1) of new water mains.

It is anticipated that the most efficient and cost-effective means of water main replacement will be to install a new line via open cut trenching methods so that the existing water services can be maintained until reconnection to the new water main is prepared for re-connection.

2.2 Other Alternatives Evaluated

Not Selected: Alternatives 2, 3, and 4

Directional Drilling (Alternative 2) consists of drilling horizontally below grade and pulling a pipe through the bore hole. This process is most efficient on straight uninterrupted section of water main which this system is not. The cost far outweighs the benefits. For these reasons Alternative 2 was not selected.

Pipe bursting (Alternative 3) is the process of forcibly breaking the existing pipe while pulling a new pipe into the same location of the existing pipe. This process is not viable on entire systems as it does not easily allow for connections and appurtenances to be added to the system. It is also a more costly alternative than open trench installation.

The No Action Alternative (Alternative 4) is to maintain the status quo. However, this 'no action alternative' leaves the system prone to failure and contamination. This alternative also results in operational issues as pipe failures lead to unscheduled system shutdowns to repair lines. This option does not address the high distribution system leakage as required by the Water Use Efficiency Rule.

2.3 No Action Alternative

See the response provided in Section 2.2.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Whidbey Island, Washington stretches 45 miles from north to south in the northern Puget Sound region. The project area is located just south of Deception Pass State Park (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 forest vegetation, 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 north Whidbey Island, they have lost much of their moisture.

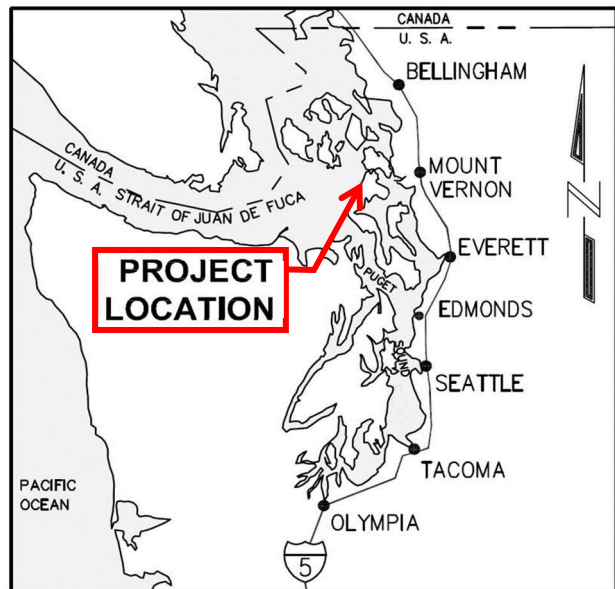


Figure 1. Regional Map

3.1 Land Use/Land Ownership

3.1.1 General Land Use

3.1.1.1 Affected Environment

The proposed action area is zoned as Rural. No purchasing of property is required for this project. The total area that is anticipated to be disturbed by construction of this proposal is approximately 9,000 square feet (4,800 linear feet of trenching with 2-foot trench width) along the edge of existing roadways with some additional construction disturbances occurring on the parcel with the reservoirs and pump house. Current land uses in the areas 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 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 Deception Drive in a Zone A floodplain.

3.3 Wetlands

The Proposed Action is located within a known wetland as observed from Island County's critical areas database and the National Wetlands Inventory mapper. The Cranberry Lake associated wetland (Category B¹, acreage not specified) is located on numerous parcels adjacent to Deception Cir.

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

3.4 Cultural Resources

This section will be completed to meet USDA RD requirements of Section 106 Consultation of the National Historic Preservation Act (NHPA). A Cultural Resource Report has been completed by Drayton Archeology and will be submitted separately 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: Freshwater Forested/Shrub Wetland aquatic habitat, Pinto abalone sea snail (*Haliotis kamtschatkana*), and Townsend's Big-eared Bat (*Corynorhinus townsendii*).

Vegetation

In general, vegetation across the site consists primarily of residential grasses, shrubs, and trees.

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 and 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 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. Any road closures during construction will be brief and residents will be informed ahead of time. There are no Island Transit bus stops within the project area. As this project involves the installation of a water system, the completed project will not generate additional traffic in the community or negatively impact 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. 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 upgrade an inadequate water system. The water system has an obligation to serve the existing users and all currently undeveloped 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 or properly secured, so as not to leave any night driving hazards. The Engineer will be empowered to either shut down construction or require corrective action when any construction practices unduly endangers the public or environment.
3. Construction hours will 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 specifications and must be approved by RD and local jurisdiction prior to construction.
5. 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 and Tulalip Tribes, 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 statutes 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: Nicole Foster
Title: Senior Environmental Scientist
Affiliation: Davido Consulting Group, Inc.
Areas of Input: QA/QC

Name: Erin Poor
Title: Civil Engineer
Affiliation: Davido Consulting Group, Inc.
Areas of Input: Authored main body of document



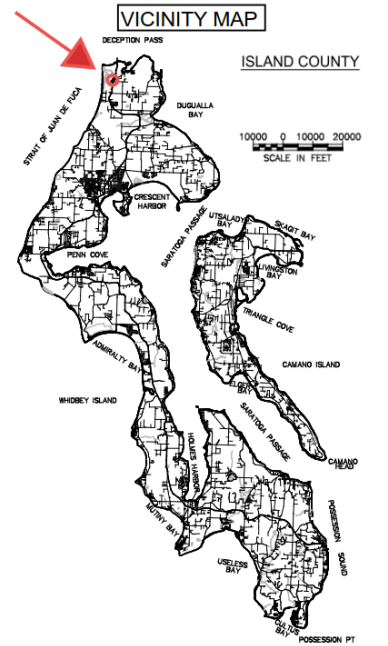
Appendix A – Retail Service Area Map

Water System
Retail Service Area
Map

Deception Pass State Park Water System

Deception Park View
Water System
Retail Service Area

North Whidbey Water District Water System





Appendix B – IPaC Results

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.

Location

Island County, Washington



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/>

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 [Ecological Services Program](#) 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 [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), 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 <i>Brachyramphus marmoratus</i> There is final critical habitat for this species. The location of the critical habitat is not available. http://ecos.fws.gov/ecp/species/4467	Threatened
Streaked Horned Lark <i>Eremophila alpestris strigata</i> Wherever found There is final critical habitat for this species. The location of the critical habitat is not available. http://ecos.fws.gov/ecp/species/7268	Threatened
Yellow-billed Cuckoo <i>Coccyzus americanus</i> There is final critical habitat for this species. The location of the critical habitat is not available. http://ecos.fws.gov/ecp/species/3911	Threatened

Fishes

NAME	STATUS
------	--------

Bull Trout *Salvelinus confluentus*

Threatened

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<http://ecos.fws.gov/ecp/species/8212>

Insects

NAME

STATUS

Monarch Butterfly *Danaus plexippus*

Candidate

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/9743>

Taylor's (=whulge) Checkerspot *Euphydryas editha taylori*

Endangered

Wherever found

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<http://ecos.fws.gov/ecp/species/5907>

Flowering Plants

NAME

STATUS

Golden Paintbrush *Castilleja levisecta*

Threatened

Wherever found

No critical habitat has been designated for this species.

<http://ecos.fws.gov/ecp/species/7706>

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 [below](#).

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 <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (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 [below](#). 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 [E-bird data mapping tool](#) (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 [below](#).

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

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.)

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.

<http://ecos.fws.gov/ecp/species/1626>

Breeds Jan 1 to Sep 30

Black Oystercatcher *Haematopus bachmani*

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

<http://ecos.fws.gov/ecp/species/9591>

Breeds Apr 15 to Oct 31

Black Turnstone *Arenaria melanocephala*

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

Breeds elsewhere

Evening Grosbeak *Coccothraustes vespertinus*

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

Breeds May 15 to Aug 10

Olive-sided Flycatcher *Contopus cooperi*

Breeds May 20 to Aug 31

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

<http://ecos.fws.gov/ecp/species/3914>

Rufous Hummingbird *selasphorus rufus*

Breeds Apr 15 to Jul 15

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

<http://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

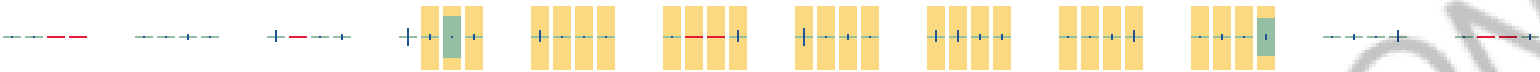
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



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.)



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

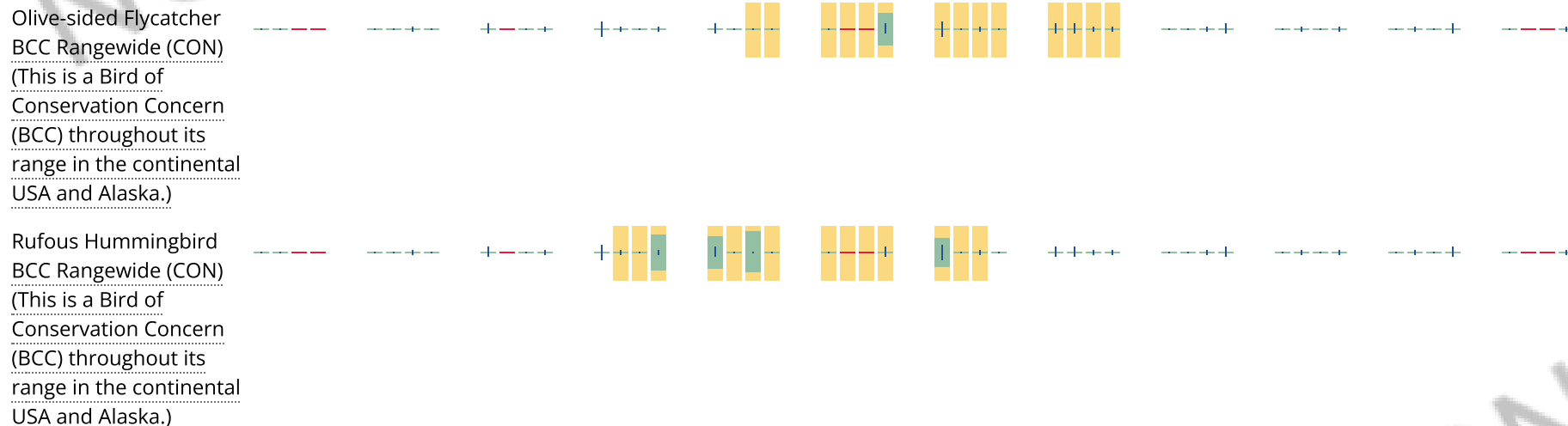


Black Turnstone
BCC Rangewide (CON)
(This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.)



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





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. [Additional measures](#) or [permits](#) 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 [Birds of Conservation Concern \(BCC\)](#) 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 [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) 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 ([Eagle Act](#) 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 [AKN Phenology Tool](#).

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 [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

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: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). 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 [Birds of Conservation Concern](#) (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 [Eagle Act](#) 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 [Northeast Ocean Data Portal](#). 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 [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

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 [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) 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

Wildlife refuges and fish hatcheries

REFUGE AND FISH HATCHERY INFORMATION IS NOT AVAILABLE AT THIS TIME

Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) 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](#).

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

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 tubercid 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



October 19, 2021

SOLE SOURCE AQUIFER CHECKLIST

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

Location: Deception Park View (DPV) Water System in northern Whidbey Island just south of Deception Pass State Park.

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

2. Project description.

The proposed improvements for the Deception Park View (DPV) Water System (Water System ID 18305H) Improvements includes replacing watermain and booster pumps to provide adequate fire flow, drilling a new well, and constructing a new reservoir to replace the current reservoir that is ageing out of its useful lifespan. The project is located in Oak Harbor, WA just south of Deception Pass State Park.

The DPV neighborhood, located in Oak Harbor, Washington, is in need of an upgrade to their water distribution system on order to provide adequate fire flow as required by the Island County fire marshal. An analysis of the rest of the system was performed to determine if there was any ageing infrastructure that may prevent the system from functioning into the foreseeable future. This analysis determined that one of the existing reservoirs is ageing out of its useful life and will need to be replaced soon. Additionally, several pumps and other appurtenances have exceeded their anticipated life and will also need to be replaced.

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?

Small pump house and reservoir currently associated with the water system. Roof runoff is dispersed on site.

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.

Seattle
9706 4th Ave NE Suite 300
Seattle, WA 98115
tel 206.523.0024

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

Whidbey Island
1796 E Main St, Suite 105
Freeland, WA 9824
tel 360.331.4131

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

No.

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 contaminants to access the aquifer and how close are they to the project?

The DPV's distribution system is served by 1 active groundwater well and 1 inactive well for emergency use. Both wells are located on parcel number S6455-00-0000A-0.

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 main 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



October 19, 2021

Washington State Department of Ecology
Attn: Loree Randall, Federal Permits/SEA
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. Deception Park View (DPV) Water System in northern Whidbey Island just south of Deception Pass State Park.

County: Island County

Sec/Twn/Rng: Map ID 273: 35/34/1E

Quarter: SW. See Map IDs above.

Legal Description: N/A

See Attachment I – Site Plan for further information.

Our applicant, Kathleen Johnson of DPV (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 and booster pumps. Construction is anticipated to occur in 2022 with a duration of approximately two months. The DPV's distribution system is served by 1 active groundwater well and 1 inactive well for emergency use. Well #2 was drilled in 1975 and has an expected lifespan of 60 years. The well pump was also installed in 1975 and has not been replaced since that time. The well pump has far exceeded its expected lifespan of 15 years and should be replaced. The system has two water reservoirs, one constructed in 1976 and the other in 2001. With an expected lifespan of 60 years, the older reservoir is approaching its anticipated useful lifespan. The pressure tanks, booster pumps, and treatment system were all installed in the 1990s and have exceeded their anticipated lifespan. Given the below factors, DPV is seeking funding from the USDA to ensure continued safe drinking water to this island community.

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

Seattle
9706 4th Ave NE Suite 300
Seattle, WA 98115
tel 206.523.0024

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

Whidbey Island
1796 E Main St, Suite 105
Freeland, WA 9824
tel 360.331.4131

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:

- (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



Attachment II – Contact Information



Table 1. Contact Information

Applicant	Applicant's Agent	USDA Environmental Specialist
Deception Park View Water System Attn: Kathleen Johnson PO Box 2446 Oak Harbor, WA 98277 (360) 675-6252	Davido Consulting Group, Inc. Attn: Jeff Tasoff, PE P.O. Box 1132 Freeland, WA 98249 (360) 331-4131	USDA Rural Development Attn: Paul Johnson 1835 Black Lake Blvd SW, Suite B Olympia, WA 98512 (360) 704-7761



Attachment III - Certification of CZMA Consistency