

Strong, Cliff

From: Bryan Sehmel [bsehmel@co.whatcom.wa.us]
Sent: Friday, August 19, 2011 2:58 PM
To: Strong, Cliff
Cc: Dunkin, Kristie A; Sam Ryan; Michael Kershner; Wayne Fitch; Bill Lynn; Al Jeroue; Ari Steinberg; MarkKnudsen
Subject: Re: FW: GPT TESC Plan
Attachments: enf11-047-Pac-Intl-Terminals-6.2-TESC-Addendum-revision-emails.pdf; enf11-047-Pac-Intl-Terminals-6.1-TESC-Addendum-20110818.pdf; enf11-047-Pac-Intl-Terminals-6.1-TESC-Geotech-Investigation-Plan-20110818.pdf; enf11-047-Pac-Intl-Terminals-6.1-TESC-Tacifier-Spec-sheet.pdf

Cliff,

Please consider this email as approval by PDS of the Final TESC plan dated Aug. 18, 2011 in concert with the revised geotech investigation site access plan and tacifier spec sheet and as amended by emails dated Aug. 19, 2011 (all attached to this email). This does not, though, provide approval for the submitted wetland delineation and PDS reserves the right to review that document separately in the future.

The preparation and review of this document has attempted to foresee and plan for various situations that may arise. However, PDS acknowledges that not all events can be expected or planned for by either your company or by PDS as the reviewer. As such, this document may be modified in the future provided a reasonable amount of time is allowed for PDS to review it.

In particular, PDS will monitor the access points and ask that your CESCL do the same, to ensure that the material approved for use on the construction entrances functions as proposed and intended.

Once the TESC plan has been completely implemented, contact PDS to schedule a compliance inspection. In the meantime, please do not hesitate to contact PDS with any questions

Kind regards,
Bryan

Bryan Sehmel
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>>> "Strong, Cliff" <Cliff.Strong@amec.com> 8/19/2011 2:04 PM >>>
Bryan, see our responses to your questions below.

Thanks,

Cliff Strong
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and Office Sustainability Coordinator
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-----Original Message-----

From: Bryan Sehmel [mailto:bsehmel@co.whatcom.wa.us]

Sent: Friday, August 19, 2011 1:03 PM

To: Strong, Cliff

Cc: Dunkin, Kristie A; Tyler Schroeder; Al Jeroue; Ari Steinberg

Subject: Re: GPT TESC Plan

Cliff,

I've looked at the plan and have some comments and/or questions:

Page 2 of the TESC includes estimates for trips per entrance. It states that entry "B" would have 16-20 trips. How is the proposed use of wetland seed mix only (instead of the upland mix as well) expected to impact this estimate? Will it impact other entries enough to modify Table 1 on page 3?

The proposal to use only wetland seed mix would decrease the number of estimated trips shown in that table. However, know that we estimated all trips on the high side to give a worst case scenario. The entrances will be stabilized and should be hold up to a range of trips.

Also, is the table only showing the "estimated total number of vehicles trips per access point from both implementation of the TESC and the restoration plan," or do the numbers include trips from the proposed additional geotech work proposed as part of the land disturbance app? The estimated numbers seem high for just restoration work, especially for the relatively small area from access "E."

The estimated number of trips does include an estimate for finishing the geotech investigation, which should only be 2 trips on most entries, perhaps 4 on some where multiple test sites still need to be drilled. And again, we wanted to be up front about a worst case scenario; actual numbers may be lower. The table label should be amended.

In addition, this would appear to complicate the statement on page 3, "Areas treated will not be driven over once worked and covered with product." Is this based on the assumption that the restoration work will not begin until after the seed has established to the 75% coverage minimum?

That sentence probably needs to be amended. The intent is not to drive over it immediately after planting; but eventually the drilling rig will need to make a few trips. However, realize that this is all for the temporary ESC; the restoration work to follow all work is the long-term, permanent solution. All disturbed areas will be replanted, reforested, hand-seeded, and then left alone.

Furthermore, it would complicate the proposed access roads/paths through open fields (some of which are wetlands) which used varied routes. Are these areas that will be covered with mats?

For the most part, mats won't be used in the open fields, as they are full of Reeds Canarygrass, an invasive species (that most agencies want eliminated). Reeds Canarygrass will bend and create its own mat for the most part. Mats would be used in areas w/o this grass.

Lastly, but related, has there been any discussion as to how the hydroseeded area might be impacted by the geotech work proposed under the land disturbance application? Meaning, perhaps a sentence/paragraph on contingency and/or maintenance of the ESC measures should be added to address this proposed impact. Or, perhaps this would be most appropriately addressed via a permit condition.

Again, following the proposed completion of the geotech investigation work, the restoration plan would be implemented, providing the long-term solution.

Kind regards,

Bryan

Bryan Sehmel

Code Enforcement & Shorelines

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>>> "Strong, Cliff" <Cliff.Strong@amec.com> 8/19/2011 11:48 AM >>>

Hey Bryan, I just received a call from Kristie (biologist) and Al (CESCL), who are out in the field right now trying to figure out the logistics of the TESC, SWPPP, and encroachment permit. In talking with the hydroseed contractor, they've come to the conclusion that switching between seed mixes (wetland and upland) will cause more problems than using just one.

In particular, the truck would need to be taken off site to switch, wash out, etc., every time they need to change seed mixes, causing more trips. They'd like to minimize trips (to minimize any additional impacts to the soil and plants) by just using the wetland seed mix throughout.

Per the TESC addendum I sent last night, the wetland seed mix is comprised of (by weight):

67% Sterile Wheatgrass

10% Seaside Creeping Bentgrass (*Agrostis stolonifera*)

10% Meadow Foxtail (*Alopecurus pratensis*)

6% Alsike Clover (*Trifolium hybridum*)

7% Redtop Bentgrass (*Agrostis stolonifera*)

Please consider this in your review of the TESC we've proposed.

Thanks,

Cliff Strong

Senior Land Use/Environmental Planner

and Office Sustainability Coordinator

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