

NEPA Environmental Assessment

24 CFR 58

Grantee/Responsible Entity (City, Town or County): Mason County
CDBG Contract #: 22-62210-024
Project Name: Evergreen Estates Water Main Extension
Project Location: E. Blevins Road R/W and Tax Parcel Number 42001330004; T 20N, R 04W, Sections 01 and 12
Project Representative: Erik Schwartz, Mason County Public Works Dept. Environmental Coordinator
Email Address: eschwartz@masoncountywa.gov
List Total Project Cost, Funding Sources and Amounts: WA State CDGB, \$551,764.

Project Description: Include all contemplated actions, which logically are geographically or functionally a composite part of the project, regardless of the source of funding. [24 CFR 58.32]

Proposed Project Activities

The project is to replace an existing community well water system with a new connection to City of Shelton water system. The purpose and need for the proposal are to alleviate elevated nitrate concerns and provide for a clean, consistent water supply for the Evergreen Estates community. The project would expand the City's water system with a new water main and associated connections to integrate the existing Evergreen Estates community water system.

Major components of the project include connection and installation of a water main, service line, and meter connecting the mobile home park to the City of Shelton water system. The water main would be an 8-inch-diameter pipe, approximately 0.16 mile (836 feet) along E. Blevins Road between the existing mobile home park and existing City system at Shelton Springs Road. A 2-inch diameter line approximately 116 feet will connect the water main to the existing Evergreen Estates distribution building. A series of 1-inch diameter service line connections in the road (each approximately 19 feet to 26 feet long) and two fire hydrants will be installed.

Construction activities include excavation/trenching within and along the roadway; staging and temporary stockpiling of materials on the ground surface within previously disturbed areas; pipefitting, laying and connecting pipes and meters; backfilling (hauling, placing, and compacting material); hauling and off-site disposal of overburden at existing stockpile/disposal facilities; road resurfacing, and seeding disturbed surfaces.

Ground disturbance includes trenches cut to lay the new water main (836 feet long) and perpendicular service line connections, and fire hydrants. Trenches will be cut into the existing road pavement approximately 3 to 4 feet deep, approximately 3 to 4 feet wide, and over lengths shown in the design drawings and described above. Work is limited to previously disturbed areas within the right-of-way and developed parcel. The road will be backfilled and resurfaced with asphalt to restore the roadway. No new impervious surface is proposed.

Project plans are shown in preliminary design drawings for the Blevins Road North Evergreen Estates Water Main Extension prepared by Mason County Public Works Department (dated 4/26/24). Design drawings reflect the preferred alternative and currently proposed activities considered in this assessment. The project location is shown on Sheet 1 of the design drawings. Location and vicinity are shown on figures in the *Environmental Review Supplement* prepared by Mason County (attached).

Interrelated Activities

Interrelated activities or "elements" of the project (e.g., future water system expansion and/or sewer system integration) are not currently planned or proposed but are potential future activities related to the current proposal and are, therefore, considered in terms of "project aggregation" (24 CFR 58.32) and potential cumulative impacts. The preferred alternative includes potential future elements (water and sewer system integrations) that are reasonably foreseeable and would occur in the same or nearby geographic area and/or involve similar purpose and need as the current proposal. It is worth noting that those elements are not dependent on the current proposal for their implementation, however. In other words, they do not meet the "but for" test of *logical* project aggregation that would make them dependent on the implementation of the current proposal.

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Instead, the interrelated activities associated with the preferred alternative could occur independently from the current proposal, in complete absence of the proposed activity, and/or at a significantly different (continued) timeframe than the proposed activity despite their *geographical* and *functional* association with the currently proposed project (i.e., similar location and purpose). Interdependent activities are nonetheless considered aggregate components of the project. Although not currently planned, designed, or funded, interrelated activities could occur within an approximately 5-year timeframe of the proposed project. Interrelated activities were considered for the purposes of this Environmental Assessment; alternatives evaluations, cumulative impacts assessment, and potential or likely impact determinations for each environmental assessment factor evaluated. However, interrelated activities would also undergo additional review for NEPA compliance during their separate, future planning and environmental review phases as applicable.

Compliance with 24 CFR 58.5 and 58.6 Laws and Authorities

Record the determinations made regarding each listed statute, executive order or regulation. Provide appropriate source documentation. [Note reviews or consultations completed as well as any applicable permits or approvals obtained or required. Note dates of contact or page references]. Provide compliance or consistency documentation. Attach additional material as appropriate. Note conditions, attenuation or mitigation measures required.

-- [Note: Attached supplemental worksheets are noted in blue under Compliance Determinations] --

Laws and Authorities with Washington state-specific guidance. Source documentation worksheets https://www.hud.gov/states/shared/working/r10/environment/		
Statutes, Executive Orders, and Regulations	Are formal compliance steps or mitigation required?	Compliance Determinations
Historic Preservation [36 CFR 800]	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/> <i>Inadvertent Discovery Plan</i>	<ul style="list-style-type: none"> • No Historic Properties Affected • DAHP: Consultation initiated 5/3/2024 (EZ Form), concurrence with finding of No Historic Properties Affected with stipulation for Inadvertent Find Plan (a.k.a. Inadvertent Discovery Plan, IDP) on 5/6/24. DAHP Log No.: 2024-05-03187-HUD-CDBG. • Tribal Correspondence: Confederated Tribes of the Chehalis, Confederated Tribes of Warm Springs, Skokomish, Squaxin Island, and Suquamish Tribes consulted on 5/3/24. Suquamish deferred to others. Squaxin Island Tribe commented on no specific concerns but recommended IDP and concurrence with DAHP recommendations. No other responses received. Consultation completed on 6/3/2024. • Reference to Other Documentation: Supplemental Historic Preservation for Washington State Worksheet; Assessment summary, EZ Form, TDAT list of tribes consulted, and all correspondence are provided in ER Supplement (attached).
Endangered Species Act [50 CFR 402]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<ul style="list-style-type: none"> • USFWS: No Effect. Meets parameters in Table A of USFWS guidance/worksheet. • NMFS: ESA = No Effect; EFH (Magnuson-Stevens Act) = No Adverse Effect. Meets performance criteria in Table A of NMFS guidance/worksheet. • Reference to Other Documentation USFWS and NMFS Guidance/Worksheets and species lists; additional assessment for NE determinations is included in the Environmental Review (ER) Supplement (p.11-12).

Laws and Authorities with Washington state-specific guidance. Source documentation worksheets https://www.hud.gov/states/shared/working/r10/environment/		
Statutes, Executive Orders, and Regulations	Are formal compliance steps or mitigation required?	Compliance Determinations
Coastal Zone Management Act [Sections 307(c), (d)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>Concurrence from Dept. of Ecology for Coastal Zone Management is no longer required under a Part 58 in Washington State. However, at the time of project development, the activity may trigger review if it falls under other parts of the CZMA regulations for federal agency activities (Title 15 CFR Part 930, Subpart C) or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the Coastal Zone Management Program. A project might be subject to CZM and further review by the Dept. of Ecology during the local permitting process.</p> <p>No Impact. The project activities are not subject to state review, consistent with Title 15 CFR 930.33(a)(2).</p> <p>Coastal Zone Management Act Worksheet. Also see ER Supplement p. 9, <i>Coastal Zone Management</i>.</p>
Coastal Barrier Resources Act, as amended [24 CFR 58.6(c)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	There are no Coastal Barrier Resource Areas in Washington State. Therefore, the Act does not apply.

Laws and Authorities with non-Washington state-specific guidance.		
Source documentation worksheets are located at: https://www.hud.gov/program_offices/comm_planning/environment_energy/regulations#relatedlawsandauthorities		
Statutes, Executive Orders and Regulations	Are formal compliance steps or mitigation required?	Compliance Determinations
Airport Hazards [24 CFR 51 D]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No impact. The project is not located within Airport Clear Zones and Accident Potential Zones based on maps identifying the boundaries. Airport Hazards Worksheet . ER Supplement p.17-18, <i>Airport Clear Zones and Accident Potential Zones</i> .
Air Quality [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No impact. No new construction or conversion of land use. Potential impacts are below de minimis levels. Project is not within a non-attainment area. Air Quality Worksheet . ER Supplement p.14, <i>Clean Air Act</i> .
Contamination and Toxic Substances [24 CFR 50.3(i) & 58.5(i)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No impact. Subject and adjacent properties are free of hazardous materials, contamination, toxic chemicals, gases and radioactive substances which could affect the health or safety of occupants or conflict with the intended use of the subject property. Contamination and Toxic Substances Worksheet. (Multifamily and Non-Residential) .
Environmental Justice [Executive Order 12898]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No adverse effects. The proposed action is to improve conditions to benefit a low-income minority population and will not create an adverse and disproportionate environmental impact or aggravate an existing impact. Environmental Justice Worksheet . ER Supplement p. 16, <i>Environmental Justice</i> .
Explosive and Flammable Hazards [24 CFR 51 C]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No impact. The project will expose neither people nor buildings to hazards. Explosive and Flammable Facilities Worksheet .
Farmland Protection [7 CFR 658]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No impact. No land use conversion. Project does not involve prime or unique farmland. The project does not include any activities, including new construction, acquisition of undeveloped land, or conversion, that could potentially convert one land use to another. Farmlands Protection Worksheet .
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Under 24 CFR 55.1 (b)(1) the prohibitions are not applicable to HUD financial assistance under the State-administered CDBG Program (24 CFR part 570, subpart I). Therefore, the Act does not apply.
Floodplain Management [24 CFR 55, Executive Order 11988]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No Impact. No floodplain present. <ul style="list-style-type: none"> • FEMA/FIRM map (reference Map #): 53045C0582E • Project in a floodplain 5 or 8 step process (public hearing dates): [Not Applicable] • Mitigation measures if applicable (such as finish floor above base flood elevation): [Not Applicable] Floodplain Management Worksheet . ER Supplement p.6, <i>Floodplain Management</i> .
Noise Abatement and Control [24 CFR 51 B]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No impact. The project does not involve development of noise sensitive uses. Noise Worksheet .
Sole Source Aquifers [40 CFR 149]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No impact. No sole source aquifers within Mason County or within 20 miles of proposed project. Sole Source Aquifers Worksheet . ER Supplement p.10, <i>Sole Source Aquifers</i> .

Laws and Authorities with non-Washington state-specific guidance.

Source documentation worksheets are located at:

https://www.hud.gov/program_offices/comm_planning/environment_energy/regulations#relatedlawsandauthorities

Statutes, Executive Orders and Regulations	Are formal compliance steps or mitigation required?	Compliance Determinations
Wetlands Protection [Executive Order 11990]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No impact. No wetlands present or affected. Wetlands Worksheet . ER Supplement p.7, <i>Wetland Protection</i> .
Wild and Scenic Rivers Act [Sections 7 (b), (c)]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No impact. No Wild & Scenic Rivers present or potentially affected. None in proximity or within 50 miles. Wild and Scenic Rivers Worksheet . ER Supplement p.13, <i>Wild and Scenic Rivers Act</i> .

Environmental Assessment Factors

24 CFR 58.40

Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor is evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation is provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority is provided. Where applicable, the necessary reviews or consultations are completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- 1) Minor beneficial impact
- 2) No impact anticipated
- 3) Minor Adverse Impact – May require mitigation
- 4) Significant or potentially significant impact requiring avoidance or modification, which may require an Environmental Impact Statement

Land Development	Impact Code	Impact Evaluation
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The project is consistent with existing plans and land use, Mason County Comprehensive Plan, and City of Shelton Water System Comprehensive Plan. ER Supplement p.20-21, <i>Consistency with Existing Plans</i> .
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The proposal would not significantly affect or be affected. There are no significant grade or surface changes proposed. Information sources reviewed: Plans, field inspection; Geologic_Hazard_Areas (Mason County 2024a); including Slope Stability (Ecology Coastal Zone Atlas), Landslides (DNR 2010) Hazard Zone (DNR 2007) Landforms (DNR 2009); and Soil Survey (NRCS).
Hazards and Nuisances including Site Safety and Noise	2	Proposal would not affect or be affected. Site conditions will be maintained. Information source reviewed: Plans, ECY cleanup sites dataset.
Energy Consumption	2	Proposal would not affect or be affected. Proposal does not involve or alter energy consumption, demand, or availability.

Socioeconomic	Impact Code	Impact Evaluation
Employment and Income Patterns	2	Proposal would not affect or be affected.
Demographic Character Changes, Displacement	2	Proposal would not affect or be affected. The preferred alternative avoids displacement and demographic character changes. Existing community would be maintained.

Community Facilities and Services	Impact Code	Impact Evaluation
Educational and Cultural Facilities	2	Proposal would not affect or be affected. New or altered facilities are not proposed. Related activities or impacts are not reasonably foreseeable consequences.
Commercial Facilities	2	Proposal would not affect or be affected. New or altered facilities are not proposed. Related activities or impacts are not reasonably foreseeable consequences.
Health Care and Social Services	1	Proposal would not measurably affect or be affected. Potential benefit due to improved environmental conditions, drinking water quality, and subsequent community health.
Solid Waste Disposal / Recycling	2	Proposal would not affect or be affected. New or altered facilities are not proposed. Related activities or impacts are not reasonably foreseeable consequences.
Waste Water / Sanitary Sewers	1	The scope of the project including potential future conversion of the community on-site septic system to City of Shelton sewage system pending final planning, design, and funding to implement would potentially benefit environmental conditions related to waste water.
Water Supply	1	The purpose of the project is to improve conditions related to water supply quality and community access to clean water. See Project Description, Existing Conditions and Trends, Project Alternatives Considered and Environmental Review Supplement
Public Safety - Police, Fire and Emergency Medical	2	No impact. Proposal would not affect or be affected.
Parks, Open Space and Recreation	2	No impact. Proposal would not affect or be affected.
Transportation and Accessibility	2	No impact. The proposal is consistent with typical road maintenance activities. The project will maintain existing transportation infrastructure.

Natural Features	Impact Code	Impact Evaluation
Unique Natural Features, Water Resources	2	No impact. Unique natural features were not identified in the immediate vicinity and would not be altered or affected by the project.
Vegetation, Wildlife	2	No impact. Vegetation and wildlife (including physical conditions affecting habitat) would be generally maintained by the project. Mason County standard procedures and best management practices (BMPs) including RRMP ESA 4(d) Program guidelines will mitigate (avoid and minimize) potential impacts to achieve conservation outcomes for protection of water quality and aquatic species.
Other Factors	1	No other factors were identified for the proposal.

Existing Conditions and Trends: Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project. [24 CFR 58.40(a)]

Project alternatives and potential cumulative impacts (summarized in the corresponding sections of this form) were assessed partly in context of the site's existing conditions and trends, and the goals (i.e., purpose and need) of the project (see Project Description).

Evergreen Estates is a low-income mobile home park with a primarily immigrant population. The septic system has been in disrepair for years. Combined with shallow, gravelly soils, this has created a condition where the water supply used by the park has the highest nitrate levels in the county.

Nitrate is a potential health hazard. Drinking water that has high levels of nitrate can cause health effects such as Methemoglobinemia or "blue baby syndrome," which results from nitrate decreasing the blood's capacity to carry oxygen, especially in infants who receive baby formula mixed with water containing nitrate above 10 mg/L. This has become an increasing concern for public health. In the absence of the project, the water supply would continue to deteriorate, and conditions would worsen resulting in increasing health risks.

Physical conditions on the site are characterized by the existing road, gravel access (alley/parking) area, and built mobile home lots with existing appurtenant structures. In absence of the proposed project, existing structures and facilities would likely be maintained for continued operation and use as existing, resulting in maintained physical (developed) characteristics on the site but continued degradation of water quality.

Alternatives and Project Modifications Considered [24 CFR 58.40(e)]:

Identify other reasonable courses of action considered and not selected, such as other sites, design modifications or other uses of the subject site. Describe the benefits and adverse impacts to the human environment of each alternative and the reasons for rejecting it.

Conversion from Community Well/Septic to City Water/Sewer (Preferred Alternative)

Conversion or integration of the existing community well water supply system to City supplied water, and potential future conversion of the community's septic system to City sewage, were collectively identified as reasonably certain to address health concerns. The alternative would involve consolidation of the Evergreen Mobile Homeowners Co-op Group A (community) water system with the City's Group A water system. This would alleviate health risks from elevated nitrate levels in drinking water and provide for a clean, consistent water supply for the most economically stressed neighborhood in the county. This alternative involves currently proposed and potential future actions including:

- A. Conversion of the Evergreen Mobile Homeowners Co-op water system by expansion of the water main approximately 836 feet along Blevins Road and associated service connection to the existing community water distribution system (currently proposed).
- B. Conversion of the Evergreen Mobile Homeowners Co-op septic system to City Sewer System in a similar manner by extending a sewer main along Blevins Road right-of-way and integrating the community's waste water system (potential future action).
- C. Integration of additional neighboring community Group A water systems and/or sewage within 2000 feet according to City of Shelton and Mason County Comprehensive Plans, currently or as amended (potential future action or actions).

Conversion from Community Well/Septic to City Water/Sewer was selected as the preferred alternative based on environmental and health benefits, consistency with local plans and ability to maintain community cohesion, low potential for adverse environment impacts, and economic factors.

Other Sites Alternative

Other site locations were not specifically identified as alternatives because the proposal is site-specific to address local water quality concerns including elevated nitrate levels and associated health risks for an existing community. Alternative sites would not address the local water quality and public health concerns or would require displacement/relocation of existing residents. The Mason County

comprehensive plan Planning Policy 12.4 encourages sharing corridors for major utilities and transportation rights-of-way (Mason County Comprehensive Plan, Chapter 2). Therefore, alternative facility locations on the site but outside of the right-of-way to address neighborhood water users were not considered further. Other locations would also likely result in greater impacts to current uses. The “other sites” alternative is, therefore, not the preferred alternative and is rejected.

Design Alternatives

An alternative to upgrade the existing well system and septic system (design modifications) without conversion to City systems was considered but would not result in the environmental and human health benefits with an equal certainty compared to switching the community to City water; and would likely have relatively higher cost and be less effective in both short-term and long-term contexts. Additionally, conversion of sewage treatment method or design without conversion of water supply was an alternative design approach considered. While potentially having long-term beneficial effects, a design approach focused strictly on sewage treatment would not adequately address immediate drinking water, environmental and human health concerns. Alternative designs are, therefore, not preferred alternatives and are rejected.

Other Uses Alternative

Other use of the site would involve displacement and relocation of existing residents and would potentially defer the improvement of environmental conditions and prolong environmental and health risks. The alternative would disrupt existing community cohesion. Relocations would be cost prohibitive compared to other alternatives. Due to cost and anticipated outcomes for environmental health compared to the preferred alternative, “other site use” is not the preferred alternative and is rejected.

No Action Alternative [24 CFR 58.40(e)]:

Discuss the benefits and adverse impacts to the human environment of not implementing the preferred alternative.

No action would avoid integration of additional water users into the City System, potentially reducing capacity requirements proportionately, or allowing equivalent consolidations of other Group A water systems into the City system, or future development or expansions to the existing system in other locations. Potential impact of the action to the City system such as capacity and anticipated operational requirements are expected to be miniscule under any alternative considered, and not significantly affected by the selection/rejection of the “no action” alternative. However, No Action would result in continued environmental and community health risks as currently exist, including elevated nitrate levels that are the highest in the county. The existing deteriorated system would continue to degrade, presenting a future economic strain and health hazard. No Action does not involve significant advantages or reduce impacts on the environment. Therefore, the “no action” alternative is not the preferred alternative and is rejected.

Cumulative Impact Analysis [24 CFR 58.32]:

Mason County considered project aggregation (24 CFR 58.32) in the assessment of potential impacts, namely activities identified as “B” and “C” described for the preferred alternative. Those include potential City sewer expansion to integrate the Evergreen Estates sewer sewer/septic system, and potential integration of additional nearby Group A water systems that would logically use the proposed water main along Blevins Road. Cumulative impacts would be insignificant and would be consistent with the Environmental Assessment determination for the currently proposed activity. Cumulative impacts would likely have a minor beneficial effect overall.

Public Outreach [24 CFR 58.43]:

Mason County will publish the Finding of No Significant Impact (FONSI) according to requirements set forth in 24 CFR 58.43. The anticipated publication date is **July 1, 2024**. Publications and public comments shall be maintained with the Environmental Review Record (ERR), available to the public

and retained according to Mason County and Washington State policies. The project has been contemplated and planned with the local community (Evergreen Mobile Homeowners Co-Op) for years and approved by Mason County Board of County Commissioners on November 8, 2022.

Mitigation Measures [40 CFR 1501.6(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate environmental impacts and to avoid non-compliance 24 CFR 58.5 and 58.6 Laws and Authorities. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents.


Law, Authority, or Factor	Mitigation Measure
Historic Preservation [36 CFR 800]	Implement Inadvertent Discovery Plan
Endangered Species Act [50 CFR 402]; and Natural Features (water resources, vegetation, and wildlife)	Implement Regional Road Maintenance ESA 4(d) Program


No other mitigation measures are required or proposed.

Determination
24 CFR 58.40(g)

- Finding of No Significant Impact**
(The project will not result in a significant impact on the quality of the human environment)

- Finding of Significant Impact**
(The project may significantly affect the quality of the human environment)

Preparer Name and Title (print): Erik Schwartz, Environmental Coordinator	
Signature: 	Date: 6/20/2024

Certifying Official Name and Title (print): Michael Collins, PE, County Engineer	
Signature: 	Date: 6/20/24

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).