

Diana Dupuis  
Director



STATE OF WASHINGTON

## WASHINGTON STATE PARKS AND RECREATION COMMISSION

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### STATE ENVIRONMENTAL POLICY ACT

#### Determination of Nonsignificance

**Date of Issuance:** December 4, 2024

**Lead Agency:** Washington State Parks and Recreation Commission

**Agency Contact:** Hannah JB Ross, Environmental Planner  
[Hannah.ross@parks.wa.gov](mailto:Hannah.ross@parks.wa.gov)

**Project Name:** Statewide Mooring Buoy and Anchor Maintenance

**Description of Proposal:** The Washington State Parks and Recreation Commission (State Parks) proposes to maintain 258 recreation mooring buoys and five marker buoys across Puget Sound. State Parks proposes to undertake maintenance based on the recommendations of a 2021 assessment and inspection of buoy conditions and anchor suitability. Anchors that have reached the end of their useful life, and/or failing, will be replaced with embedded anchor technology to minimize environmental impact. If an embedded anchor is not possible due to substrate refusal, a block anchor (~4,000 pounds) will be installed. State Parks will carry out a biennial diving maintenance inspection program to clean marine growth from anchor eye, tackle and buoys, inspect anchor and tackle condition, replace worn and/or damaged parts, survey eelgrass and macroalgae and remove marine debris, including crab pots, derelict fishing gear and abandoned boat anchors. Inspections and maintenance activities are to provide safe public moorage opportunities and limit amount of anchoring to minimize impacts to the substrate and aquatic environment. In addition, four linear moorage systems will be removed without being replaced.

**Location of Proposal:** The location of mooring buoys is across Puget Sound extending across nine counties and local jurisdictions including - San Juan, Skagit, Thurston, King, Jefferson, Kitsap, Clallam, Mason, King and Pierce counties and City of Des Moines and City of Port Townsend.

**Threshold Determination:** Washington State Parks and Recreation Commission has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030. We have reviewed the attached Environmental Checklist and other information on file with the lead agency. This information is available at: [www.parks.wa.gov/SEPA](http://www.parks.wa.gov/SEPA).

This determination is based on the following findings and conclusions:

1. The proposed project will comply with the State Park's Natural Resource Management Policy No. 73-04-1 Protecting State Park's Natural Resources.
2. The new anchors will be accurately located at existing coordinates by ship-based GPS. Anchor replacement will occur as close as possible to the existing and previously recorded mooring buoy location.
3. Replacement mooring buoys and anchors will be installed using an embedded anchor driven into the seabed, as is recommended in the 2014 WAC Hydraulic Code Rules (WAC 220-660-380) for minimal impact buoy design.
4. Where embedded anchors are not possible due to substrate conditions (i.e. bedrock) a (4000 pound) 5' x 5' x 1.5' concrete block anchor.
5. The project is designed to avoid and minimize impact to the aquatic environment through removal of concrete anchors (if feasible) and ensuring anchors in use are appropriately sized and in good condition; thereby limiting or preventing anchors being dragged by boats, providing a place for recreational boats to moor, preventing repeated use of boat anchors in a location causing more disturbance to the aquatic environment.
6. Construction activities will be conducted in such a way to limit disturbance to the minimum required to complete the work. Work will be done within the approved in-water work windows.
7. Equipment will be kept in good running condition and engines will be run only while needed to help reduce possibility of deleterious materials entering the water column. Disposal of any waste material will be done appropriately at an approved upland disposal site.
8. Installation activities will take place at compatible tides during daylight hours to ensure equipment does not ground out and installations are sufficient.
9. Spill prevention and clean-up plans will be in place prior to work activities as a safeguard against unexpected, accidental contamination. If a spill does occur the project activity will immediately be halted, and Department of Ecology and Washington Department of Fish and Wildlife Area Habitat Biologist will be notified.
10. Uncured concrete will not be allowed to come into contact with water.
11. Buoys will be replaced at tidal elevations between -15 feet relative to Mean Lower Low Water (MLLW) and -30 feet relative to MLLW.
12. The buoy will be three feet or less in diameter comprised of plastic material that will not result in Styrofoam being released to the environment.
13. Buoys will not exceed four per acre at any time.
14. Buoy anchors will be replaced so that the anchor line does not drag or scour.
15. Flotation will be completely contained to prevent breakup.
16. Moored vessels will not ground out at low water.
17. The bottom of any structure, vessel or watercraft will be at least 1 foot above the substrate during all water levels.

18. During biannually dive and inspections, derelict fishing gear and debris will be removed from the vicinity of mooring buoys.
19. Linear moorage systems will be removed and not replaced as part of this proposed work thereby removing an approximately 6-acre footprint of development from the marine environment.

This DNS is issued under WAC 197-11-340 (2) and the comment period will end on **December 18, 2024**.

**Responsible Official:** Hannah JB Ross  
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**Date:** December 4, 2024

**Signature:** \_\_\_\_\_



"All Washington State Parks are developed and maintained for the enjoyment of all persons regardless of age, sex, creed, ethnic origin, or physical limitations."

There is no agency SEPA appeal; however all comments are welcome and will be thoroughly considered.

# **SEPA<sup>1</sup> Environmental Checklist**

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## **Purpose of checklist**

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

## **A. Background**

[Find help answering background questions<sup>2</sup>](#)

### **1. Name of proposed project, if applicable:**

Statewide Mooring Buoy and Anchor Maintenance

### **2. Name of applicant:**

Devin Sola, Environmental Planner

### **3. Address and phone number of applicant and contact person:**

WA State Parks and Recreation Commission  
NW Region  
220 N Walnut St, Burlington WA 98233  
(360) 755-2812

### **4. Date checklist prepared:**

July – November 2024

### **5. Agency requesting checklist:**

WA State Parks and Recreation Commission  
San Juan, Skagit, Thurston, King, Jefferson, Kitsap, Clallam, Mason, and Pierce counties  
City of Des Moines and City of Port Townsend

### **6. Proposed timing of schedule (including phasing, if applicable):**

Mooring buoy maintenance is ongoing and will be completed with programmatic permitting in a five-year period. Maintenance will not be phased, however there are more buoy anchors needing replacement that can occur in one in-water work season. State Parks will

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<sup>1</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance>

<sup>2</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background>

prioritize buoy anchor replacement based on current conditions. State Parks anticipates buoy maintenance to be prioritized in Jefferson and San Juan Counties. It is estimated that it will take approximately five years or three seasons to replace 258 State Parks mooring buoys across the Salish Sea. In addition, five (5) marker buoys will be maintained and four linear moorage systems will be removed without being replaced.

**7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**

There are no plans for additional buoys or expansion. The proposed project is for mooring buoy maintenance and anchor replacement for existing buoys. Maintenance of mooring buoys and tackle was reviewed previously under SEPA with the following:

- Northwest Region Mooring Buoy Maintenance – SEPA DNS Determination January 13, 2016
- Southwest Region Mooring Buoy Maintenance – Letter of Categorical Exemption dated January 6, 2016

These SEPA documents are available upon request. This SEPA review will build upon the previous reviews and include mooring buoys across State Parks in Northwest and Southwest Regions and maintenance activities that are consistent with current standards of work and best management practices.

State Parks is seeking to develop a system-wide buoy planning effort. Resources for this planning effort are currently being explored. SEPA for a planning effort would be undertaken separately once the effort and scale are better defined.

**8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

- 2021 Mooring Buoy Assessment
- SEPA Categorical Exemption- SW Region Mooring Buoy Maintenance  
January 6, 2016
- SEPA Checklist and DNS  
Maintenance and replacement of buoy floats, tackle, lines and spars on one to three year cycle. Routine maintenance does not include modification to or replacement of anchors  
January 13, 2016
- SEPA Categorical Exemption  
NW Region Replace tackle, helical screws or concrete block anchors  
July 30, 2014
- SEPA Categorical Exemption Determination with Checklist  
Replace existing concrete block anchoring system with a helical anchor system  
July 22, 2004

**9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.**

None Known.

**10. List any government approvals or permits that will be needed for your proposal, if known.**

- Shoreline Permits – San Juan County, Skagit County, City of Des Moines, Jefferson County, Kitsap County, Mason County, Clallam County, Pierce County, Thurston County, City of Port Townsend
- Hydraulic Project Approval - WA Department of Fish and Wildlife
- Aquatic Use Authorization- WA Department of Natural Resources through Memorandum of Understanding Agreement
- US Army Corps of Engineers Approval

**11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)**

Washington State Parks and Recreation Commission (State Parks) operates 258 mooring buoys, five marker buoys and four linear moorage systems throughout Puget Sound (Attachment A). The purpose of State Parks mooring buoys is to provide daily and overnight moorage to the public for recreation and access to state-owned aquatic lands as well as upland public recreation opportunities. In 2021, a mooring buoy assessment was completed for State Parks. The anchor type, condition, and suitability were evaluated along with the tackle and buoy. Based on the mooring buoy assessment work done in 2021, there are two basic kinds of existing mooring buoy anchors (Attachment B):

- Concrete block anchor – the typical size of concrete block anchors is approximately 30” x 30” x 24” weighing approximately 2000 pounds. These anchors sit on the bottom of the substrate. In some instances, there is also a previously used additional 500 pound “clump weight” remaining onsite adjacent to the main anchor.
- Embedded anchor – in some cases there are existing embedded anchors. These anchors have a helical design and have been driven into the substrate approximately 6 feet deep.

State Parks proposes to undertake maintenance based on the recommendations of the assessment and inspection data gathered. Anchors that have reached the end of their useful life, and/or failing, will be replaced with embedded anchor technology to minimize environmental impact. If an embedded anchor is not possible due to substrate refusal, a block anchor (~4,000 pounds) will be installed. Designs for proposed anchor replacements are included in Attachment B. From the seabed, the embedded anchor rope rode is comprised of a 1-inch double braid nylon rope with a midline float held in place with a

plastic worm grip. A repairable thimble connects the rope rode to 6-feet of long-link galvanized chain. The chain connects through a 24-inch pendent type buoy with a tunnel to a mooring ring. Once replacements are completed, the buoys will be inspected every other year (biannually) and maintenance will be completed as needed to provide safe public moorage opportunities and limit amount of anchoring to minimize impacts to the substrate and aquatic environment.

Linear moorage systems at Stuart and Sucia Islands are proposed to be removed and *not* replaced. A site plan for the existing linear moorage is included as Attachment C. The linear moorage facilities and their approximate lengths are provided in the table below. Linear moorage systems are anchored with embedded anchors consisting of steel plates approximately 3-feet by 3-feet that were driven into the substrate until refusal and have a chain that secures the linear system to the anchors.

Location	Latitude	Longitude	Approximate Length (feet)	Number of Anchors	Substrate
Stuart Island - Reid Harbor	48.672734	-123.196433	200	6	Mud
Stuart Island – Prevost Harbor	48.679214	-123.196294	100	4	Mud
Sucia – Echo Bay 1	48.759947	-122.905889	200	6	Mud
Sucia – Echo Bay 2	48.759969	-122.907333	200	6	Mud

The proposed project is for maintenance and replacement as needed to provide safe public moorage.

**Anchor maintenance/replacement includes:**

Anchors that have reached the end of their useful life will be replaced. In addition, existing concrete anchors will be replaced with embedded anchors wherever possible to minimize disturbance. Anchors will be replaced with:

- An embedded anchor, or if an embedded anchor is not suitable given onsite conditions, then
- A 4000-pound concrete block anchor will be installed.

An embedded anchor design is the preferred design for this project, as is recommended in the 2014 WAC Hydraulic Code Rules (WAC 220-660-380) for minimal impact mooring buoy design. However, unknown site specifics may not allow for an embedded anchor to be fully driven into the seabed. It is also possible that the embedded anchor may not hold into the substrate. This will not be known until installation is attempted. If an embedded anchor is not accepted or does not hold in the substrate, a concrete anchor will be substituted. All other components of the mooring design will remain the same other than the anchor type. Anchor replacement will occur as close as possible to the existing and previously recorded mooring buoy location (Attachment D).

### Description of work

The proposed maintenance sequence and work activities includes the following. Mooring buoy anchors will be inspected every other year (biannually).

Removal of existing anchors:

1. Concrete block anchors will be removed via a barge with crane. A scuba diver will rig the lifting line or cable to the block which will then be placed on the barge for disposal at an appropriate upland facility.
2. Embedded anchors will be removed via reversed hydraulic driver operated by scuba divers. Embedded anchors which refuse removal will be cut at or below the mudline with a handsaw. When the embedded anchor has been removed, it will be placed on the barge for disposal at an appropriate upland facility.

Installation of new anchors (State Parks has a preference for replacing concrete anchor blocks with helical screws):

1. The new embedded anchors will be accurately located at existing coordinates by ship-based GPS. A barge-mounted crane will lower the anchor to the location on the seabed where it will be installed by scuba divers operating a hydraulic driver. Upon reaching the minimum insertion depth of 8-feet or the limit of hydraulic resistance, the divers will rig the mooring buoy and components to the anchor.
2. In the event of substrate refusal of an attempted embedded anchor, a 4,000-pound concrete block will be substituted. The anchor block will be accurately located at existing coordinates by ship-based GPS. A barge-mounted crane will lower the anchor to the location on the seabed where scuba divers will rig the mooring buoy and components to the anchor.

### **Mooring buoy, float and tackle maintenance and replacement:**

The following activities will be completed to maintain existing mooring buoys.

1. Cleaning - Mooring buoy floats are cleaned over the water by brushing and scrubbing to remove algae, barnacles and other accumulations of materials that may discolor or corrode the buoy float. No chemicals or solvents are used to clean buoys. In some instances where buoy floats cannot be adequately cleaned by hand, the buoys will be taken to an upland location for cleaning or replaced in-kind with a new buoy float.
2. Replacement - Replacement of the mooring and marker buoy floats and tackle requires a boat, boat operator, and crewperson, two self-contained underwater breathing apparatus (scuba) divers, and hand tools such as wrenches and pliers. The scuba diver swims to the sea floor while holding one end of the tackle which is affixed to the new mooring buoy float. The scuba diver then disconnects the shackle of the existing tackle from the anchor and connects the new tackle. The crewperson



aboard the boat then pulls the old moorage buoy float and tackle aboard the boat. The old tackle and mooring buoy float are transported to shore and disposed of at an appropriate upland facility. State Park's mooring buoys contain a mix of helical anchor and concrete block anchors. The same initial procedure is followed whether the scuba diver is replacing the buoy float and tackle on a helical screw anchor or on a concrete block anchor.

**Remove linear moorage systems at Sucia and Stuart Islands:** Removal of the linear moorage system will include using a torch underwater to cut the chain from the anchor. Chain will be cut at or just below (up to one foot) the mud surface. Embedded anchors will be left in place to minimize impact to the substrate and surrounding habitat. All floats, chains, buoys and infrastructure will be removed from the water and disposed of at an approved upland facility.

- 12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The location of mooring buoys is across Puget Sound expanding across nine counties and local jurisdictions including - San Juan, Skagit, Thurston, King, Jefferson, Kitsap, Clallam, Mason, King and Pierce counties and City of Des Moines and City of Port Townsend. Attachment D provides location details of each buoy and system including approximate latitudes and longitudes. Vicinity maps of mooring buoys by State Park are included in Attachment E and listed alphabetically. Locations of linear moorage systems are included in Question A.11.

## B. Environmental Elements

### 1. Earth

[Find help answering earth questions](#)<sup>3</sup>

**a. General description of the site:**

State Parks' 258 public mooring buoys are located in Puget Sound and the United States' waters of the Salish Sea. The project takes place in marine waters with a minimum depth of 9 feet from the shallowest buoy and along shorelines fronting state parks.

**Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:**

Aquatic

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<sup>3</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

**b. What is the steepest slope on the site (approximate percent slope)?**

The mooring buoys are located in the water and in areas with substrates that are appropriate for anchor placement.

**c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them, and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.**

All proposed work activity will occur in the aquatic environment. No upland work is proposed. Mooring buoy substrate was inspected during a 2021 assessment (Attachment D).

**d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.**

No, there are no surface indications of unstable soils because the mooring buoys are located in the waters off-shore.

**e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.**

No grading or excavation is proposed as part of the project. There is no fill component to the proposed project. Embedded anchors are proposed to replace concrete block anchors where feasible. In cases where block anchors are required due to substrate refusal a concrete block anchor is proposed. Block anchors will consist of 5' x 5' x 1.5' (4000 pound) concrete block (Attachment B).

**f. Could erosion occur because of clearing, construction, or use? If so, generally describe.**

No, there is no clearing, grading or excavation proposed as a result of project activities. There is no proposed work above the ordinary high water mark (OHWM).

**g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?**

There will be no impervious surface created as part of the project.

**h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any.**

Embedded anchors are proposed to replace existing concrete block anchors where feasible. Where embedded anchors are not possible due to substrate conditions (i.e. bedrock) a 4,000-pound concrete anchor is proposed with a design to limit dragging potential when boats are moored.

## 2. Air

[Find help answering air questions](#)<sup>4</sup>

- a. **What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.**

There is the potential for machine exhaust to be generated during maintenance. These impacts would be temporary, and the completed project would not produce new emissions.

- b. **Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.**

No off-site sources of emissions or odors are expected to affect the project.

- c. **Proposed measures to reduce or control emissions or other impacts to air, if any:**

Construction timelines will be limited to the minimum necessary to accomplish the work.

## 3. Water

[Find help answering water questions](#)<sup>5</sup>

- a. **Surface:**

[Find help answering surface water questions](#)<sup>6</sup>

1. **Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

Yes, the project will take place below the OHWM in the Northwest waters of: the East Passage of Puget Sound, Blind Bay/Harney Channel, Rosario Strait, Spring Passage, San Juan Channel, Strait of Georgia, East Sound/Obstruction Pass, Boundary Pass/Active Cove, Lopez Sound, Haro Strait/Boundary Pass, Skagit Bay and in Southwest waters: Balch Passage, Carr Inlet, Admiralty Inlet, Kilisut Harbor, Port

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<sup>4</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

<sup>5</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

<sup>6</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

Townsend Bay, Pickering Passage, Port Orchard Passage, Case Inlet, Hood Canal, Sequim Bay, Nisqually Reach.

- 2. Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.**

Yes, the work will take place within the waters described in question 3.a.1.

- 3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

No dredging would take place as a result of the project. In instances where an embedded anchor is not possible due to substrate refusal, a concrete block anchor is proposed. See description of concrete anchors in Question B.1.e.

- 4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.**

No there will be no water withdrawals or diversions as a result of the proposed project.

- 5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

The project will occur in the 100-year floodplain, all activities will occur below 0.00 feet Mean Lower Low Water (MLLW).

- 6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

No there are no discharges of waste materials to surface waters.

**b. Ground:**

[Find help answering ground water questions](https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater)<sup>7</sup>

- 1. Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give a general description, purpose, and approximate quantities if known.**

No.

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<sup>7</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

- 2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

There will be no waste material that will be discharged into the ground as a result of project activities.

**c. Water Runoff (including stormwater):**

- 1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

Upland construction activities that could impact stormwater runoff are not proposed. All construction materials will be properly stored and contained so that these products will not spill or otherwise enter the coastal environment or waters of the state.

- 2. Could waste materials enter ground or surface waters? If so, generally describe.**

No, the Project does not propose any discharges of waste materials to groundwater or surface water. An unintentional release of fuel, lubricants, or hydraulic fluid from construction equipment could occur during construction activities but is considered unlikely. The following Best Management Practices (BMPs) will be followed to prevent waste materials from entering surface waters:

- Equipment will be kept in good running condition and engines will be run only while needed to help reduce possibility of deleterious materials entering the water column.
- Disposal of any waste material will be done appropriately at an approved upland disposal site.
- Installation activities will take place at compatible tides during daylight hours to ensure equipment does not ground out and installations are sufficient.
- Spill prevention and clean-up plans will be in place prior to work activities as a safeguard against unexpected, accidental contamination. If a spill does occur the project activity will immediately be halted, and Department of Ecology and Washington Department of Fish and Wildlife Area Habitat Biologist will be notified.

- 3. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

No, the Project will not alter or otherwise affect drainage patterns in the vicinity of the site as there is no upland altering activities.

- **Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:**  
There are no proposed measures to reduce erosion or runoff as there is no upland ground disturbance proposed, nor is there excavation proposed. All activities proposed are below OHWM and below extreme low tide.

## 4. Plants

[Find help answering plants questions](#)

**a. Check the types of vegetation found on the site:**

- deciduous tree: alder, maple, aspen, other**
- evergreen tree: fir, cedar, pine, other**
- shrubs**
- grass**
- pasture**
- crop or grain**
- orchards, vineyards, or other permanent crops.**
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other**
- water plants: water lily, eelgrass, milfoil, other: macro algae**
- other types of vegetation**

**b. What kind and amount of vegetation will be removed or altered?**

Vegetation varies among buoy locations. Please see Attachment F for presence, absence for eelgrass and macroalgae survey data from 2023 and 2024 within 25 ft of buoys.

**c. List threatened and endangered species known to be on or near the site.**

There are no known threatened or endangered vegetation species known to occur in or near the site. There are known threatened and endangered species that utilize eelgrass habitat. Question 5.d. includes measures to avoid and minimize impacts to sensitive habitat.

**d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any.**

Terrestrial landscaping is not proposed as part of the Project as terrestrial vegetation will not be disturbed as part of the Project. The project is designed to avoid and minimize impact to the aquatic environment through removal of concrete anchors (if feasible) and ensuring the anchors in use are appropriately sized and in good condition; thereby limiting or preventing anchors being dragged by boats, providing a place for recreational boats to moor. Where there is eelgrass, mooring buoys help alleviate

disturbance to the aquatic environment from repeated use by boat anchors. During biannually dive and inspections, derelict fishing gear and debris will be removed from the vicinity of mooring buoys.

**e. List all noxious weeds and invasive species known to be on or near the site.**

None known.

## 5. Animals

[Find help answering animal questions](#)<sup>8</sup>

**a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site.**

**Examples include:**

- **Birds:** hawk, heron, eagle, songbirds, other:
- **Mammals:** deer, bear, elk, beaver, other: seals
- **Fish:** bass, salmon, trout, herring, shellfish, other: forage fish

**b. List any threatened and endangered species known to be on or near the site.**

Washington Department of Fish and Wildlife Priority Habitat Species map, U.S. Fish and Wildlife Services' IPaC mapping tool, and National Oceanic Atmospheric Administration's (NOAA) Fisheries West Coast Region Species and Habitat App were reviewed for state and federal threatened and endangered species known to be near or around the vicinity of state parks with mooring buoys. The following results of review are included in Attachment G.

No impacts to these species or habitat are anticipated as a result of this project. The proposed activity is maintenance of existing structure, reducing the footprint of existing structures by replacing block anchors with embedded anchors where feasible, and removal of linear moorage systems (four total, Stuart Island two linear moorage systems, Sucia Island two linear moorage systems).

**c. Is the site part of a migration route? If so, explain.**

Yes, the project area and the surrounding waterways are used by migrating salmonid species.

The project area is also situated within the Pacific Flyway, which supports a variety of migratory birds. The Pacific Flyway includes the entire west coast of North America reaching from northern Alaska and Canada to the southern tip of Mexico

**d. Proposed measures to preserve or enhance wildlife, if any.**

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<sup>8</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>  
SEPA Environmental checklist                      September 2023

The Project has been designed to avoid and minimize possible adverse impacts to the environment and wildlife. Replacement mooring buoys will be installed using an embedded anchor driven into the seabed, as is recommended in the 2014 WAC Hydraulic Code Rules (WAC 220-660-380) for minimal impact buoy design. If an embedded anchor is not feasible, a concrete block will be used to anchor the buoy in the same location. The project is designed to avoid and minimize impact to the aquatic environment through removal of concrete anchors (if feasible) and ensuring the anchors in use are appropriately sized and in good condition; thereby limiting or preventing anchors being dragged by boats, providing a place for recreational boats to moor preventing repeated use of boat anchors in a location causing more disturbance to the aquatic environment.

The following avoidance and minimization measures (AMMs) and BMPs are specific to the protection of habitat and wildlife and are in addition to the BMPs listed in Question 3.6.c.2.

- All applicable permits/approvals will be obtained for construction. For example, it is expected a USACE Nationwide Permit will be required per the Programmatic Endangered Species Act (ESA) Consultations [U.S. Fish and Wildlife Service (USFWS) reference number 01EWF00-2015-I-0104, National Marine Fisheries Service (NMFS) reference number WCR-2005007506 and Essential Fish Habitat Conservation Recommendations included in the Salish Sea Nearshore Programmatic Consultation, Version May 25, 2023.
- Work will be performed within the approved work windows for listed species.
- The activity is limited to the replacement of mooring buoys for a single boat, non commercial use.
- Buoy location will be accessed by a small boat or dinghy.
- Buoy replacement will be with an embedded anchor whenever possible if substrate refusal does not allow for embedded anchor a block anchor (~4,000 pounds) will be explored.
- Uncured concrete will not be allowed to come into contact with water.
- Buoys will be replaced at tidal elevations between -15 feet relative to Mean Lower Low Water (MLLW) and -30 feet relative to MLLW.
- The buoy will be three feet or less in diameter comprised of plastic material that will not result in Styrofoam being released to the environment.
- Buoys will not exceed four per acre at any time.
- Buoy anchors will be replaced so that the anchor line does not drag or scour.
- Flotation will be completely contained to prevent breakup.



- Moored vessels will not ground out at low water.
- The bottom of any structure, vessel or watercraft will be at least 1-foot above the substrate during all water levels.
- All equipment that will operate over water will be in good condition and repair – clean of accumulated grease, oil and/or mud. All leaks will be repaired prior to arriving on site. Equipment will be inspected daily for leaks, accumulations of grease, etc. and any identified problems will be fixed before operating over water.
- No solvents or chemical will be used in or over the water during construction or operation of the proposed action.
- No waste material, including material associated with treated wood decks, will enter the waterbody.
- All waste material and construction debris will be collected and disposed of at an approved facility that is in compliance with the Endangered Species Act.
- All floating debris generated during replacement and maintenance activities will be retrieved, removed, and disposed of at an approved upland location.
- A written spill prevention, control, and countermeasures plan should be prepared for activities that include the use of heavy equipment. The plan should describe measures to prevent or reduce impacts from accidental leaks or spills, and will contain a description of all hazardous materials that will be used, proper storage and handling, and monitoring methods. A spill kit should be available onsite during construction and stored in a location that facilitates immediate deployment if needed.
- Projects within 1/4 mile of suitable western snowy plover nesting or foraging habitat will not occur from March 15 through September 30.
- Work vessels and/or barges will not ground out during maintenance and replacement activities.

Additional measures to improve habitat and offset adverse impacts are also proposed:

- As part of routine maintenance and biannually dive and inspections, derelict fishing gear and debris will be removed from the vicinity of mooring buoys
- In addition, linear moorage systems will be removed and not replaced as part of this proposed work thereby removing an approximately 6 acres footprint of development from the marine environment.

**e. List any invasive animal species known to be on or near the site.**

None known.

## 6. Energy and natural resources

[Find help answering energy and natural resource questions](#)<sup>9</sup>

- a. **What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.**

There will be no energy needs beyond what is required for maintenance of the existing buoys.

- b. **Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.**

There is no potential effects on the use of solar energy by adjacent properties by the proposed project. Mooring buoys extend approximately 18 to 24 inches above the water surface.

- c. **What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.**

No energy conservation features are proposed because the buoys have no energy needs.

## 7. Environmental health

[Health Find help with answering environmental health questions](#)<sup>10</sup>

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur because of this proposal? If so, describe.**

There are no anticipated environmental health hazards as a result of the project. There is a potential for spills to surface water associated with equipment used to remove and install anchors and maintenance activities. Potential and BMPs to reduce risk are included in Question 3.c.2 above.

1. **Describe any known or possible contamination at the site from present or past uses.**

Since mooring buoys are located in waters of the state the Department of Ecology's [Water Quality Atlas Map](#) of 303d listed waters was reviewed. Category of 303d listed waters and parameter for category ranking is listed in Attachment H per park with mooring buoys and linear moorage system.

2. **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

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<sup>9</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>

<sup>10</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

None known existing hazardous chemicals or conditions are known to exist that would affect the project. The project is maintenance activities within the existing footprint and will not result in a change of use.

**3. Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

Mooring buoys are designed for public recreation vessel moorage. Materials typically stored on recreational vehicles typically include fuel and sewage.

**4. Describe special emergency services that might be required.**

In the event of an accidental injury that requires emergency services, the park manager and/or rangers may be contacted to facilitate or support the extraction of the affected individual or individuals to nearby services.

**5. Proposed measures to reduce or control environmental health hazards, if any.**

No discharge zone ([Chapter 173-228 WAC](#)) for vessel sewage stickers will be added to State Park mooring buoys. Additionally, no discharge zone signage is posted at kiosks at all marine state parks.

**b. Noise**

**1. What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

There is no known noise in the area that would affect the project.

**2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

No long-term noise increases are anticipated as a result of the proposed maintenance. Noise is anticipated on a short-term basis during maintenance as a result of the boat motor and maintenance activity.

**3. Proposed measures to reduce or control noise impacts, if any:**

No noise impacts are anticipated. However, measures to reduce noise during maintenance and construction include turning off motors when not in use.

## 8. Land and shoreline use

[Find help answering land and shoreline use questions](#)<sup>11</sup>

**a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

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<sup>11</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>  
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The current use is recreation and boating access. The adjacent properties are generally state parks, managed for the purpose of public recreation. The proposed maintenance will not result in a change from existing uses and anticipated to have no effect on the current land uses nearby on adjacent properties.

- **Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

No, the project site is in submerged aquatic lands below OHWM.

1. **Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

No the project will not affect or be affected by surrounding farm or forest land. The adjacent landownership is state parks.

- b. **Describe any structures on the site.**

At each project location there are existing mooring buoys. Attachment D describes the type of anchor currently supporting each mooring buoy. A description of each anchor type and the mooring buoy system is included in question A.11.

- c. **Will any structures be demolished? If so, what?**

Yes, existing anchors beyond their design life are planned to be removed and replaced  
Removal of existing anchors:

1. Concrete block anchors will be removed via a barge with crane. A scuba diver will rig the lifting line or cable to the block which will then be placed on the barge for disposal at an appropriate upland facility.
2. Embedded anchors will be removed via reversed hydraulic driver operated by scuba divers. Embedded anchors which refuse removal will be cut at or below the mudline with a handsaw. When the embedded anchor has been removed, it will be placed on the barge for disposal at an appropriate upland facility.

- d. **What is the current zoning classification of the site?**

Because the buoys are located off-shore there is no zoning classification. All of the project areas are in aquatic areas.

- e. **What is the current comprehensive plan designation of the site?**

The current designation is aquatic.

- f. **If applicable, what is the current shoreline master program designation of the site?**

The current shoreline master program designation is aquatic.

- g. Has any part of the site been classified as a critical area by the city or county? If so, specify.**

The entirety of the project sites are within the marine environment and does not have any impact above OHWM. There are some locations that are within or near eelgrass or areas identified by WDFW a priority habitat for certain species (Attachments F and G).

- h. Approximately how many people would reside or work in the completed project?**

None.

- i. Approximately how many people would the completed project displace?**

None.

- j. Proposed measures to avoid or reduce displacement impacts, if any.**

No displacement impacts will occur, so no measures are proposed.

- k. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.**

The proposed use is consistent with the existing use. There is no change in use as a result of the project. The mooring buoys are located offshore from state parks which are used for recreational purposes. The proposed project is compatible with recreational use at the project site.

- l. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:**

There are no proposed measures as the project is located in marine waters.

## 9. Housing

[Find help answering housing questions](#)<sup>12</sup>

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.**

None, the project will not provide housing.

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.**

None, the project will not remove any housing.

- c. Proposed measures to reduce or control housing impacts, if any:**

The project will not remove or add any housing.

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<sup>12</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>  
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## 10. Aesthetics

[Find help answering aesthetics questions](#)<sup>13</sup>

- a. **What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?**

Mooring buoys float on the water surface and are approximately 18-24 inches in height. There is no proposed change in height from existing. Buoys will be replaced in kind once they are beyond their design life.

- b. **What views in the immediate vicinity would be altered or obstructed?**

There will be no views in the vicinity which will be impacted as the project occurs in the marine waters offshore. This is maintenance of existing structures and there will be no change in view from the surface water.

- c. **Proposed measures to reduce or control aesthetic impacts, if any:**

No measures are proposed. The mooring buoys are in need of maintenance and replacement. The replacement buoys are typical of other moorage facilities in other parks and shoreline areas.

## 11. Light and glare

[Find help answering light and glare questions](#)<sup>14</sup>

- a. **What type of light or glare will the proposal produce? What time of day would it mainly occur?**

No lights or glare will occur due to this project.

- b. **Could light or glare from the finished project be a safety hazard or interfere with views?**

It is possible that moored vessels would have lights at night. Mastheads and/or anchor lights are generally lit all night. Boat lights mitigate marine safety hazards and will have negligible impacts to views from shore. Vessel lights would also not constitute a change from existing use.

- c. **What existing off-site sources of light or glare may affect your proposal?**

None known.

- d. **Proposed measures to reduce or control light and glare impacts, if any:**

There are no proposed measures to reduce or control light and glare impacts.

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<sup>13</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

<sup>14</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

## 12. Recreation

[Find help answering recreation questions](#)

- a. What designated and informal recreational opportunities are in the immediate vicinity?**

Mooring buoys are located offshore. Frequent activities in the immediate vicinity are bird watching, fishing, swimming, camping, hiking, boating and/or kayaking.

- b. Would the proposed project displace any existing recreational uses? If so, describe.**

- c. Buoys would be temporarily closed during maintenance and anchor replacement activities. Closure would last approximately a half day per buoy for anchor replacement.**

**Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:**

Communications will be sent out via State Parks website and other communications to inform the public regarding mooring buoy maintenance and replacement schedule.

## 13. Historic and cultural preservation

[Find help answering historic and cultural preservation questions](#)<sup>15</sup>

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.**

No, there are no structures over 45 years old.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

There are no known previous studies. The project sites are aquatic and under water.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.**

This project is subject to Section 106 of the Historic Preservation Act. The USACE, as the lead agency, will be responsible for assessment of potential impacts to cultural and historic resources on or near the project site.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

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<sup>15</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>  
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A permit from the USACE will be required and thus the project is subject to Section 106 of the Historic Preservation Act decisions about measures to avoid, minimize, or compensate for loss, changes to, and disturbances of resources will occur as part of the consultation process. A State Parks Inadvertent Discovery Plan will be used during the project

## 14. Transportation

[Find help with answering transportation questions](#)<sup>16</sup>

- a. **Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.**

The project sites are only accessible by boat.

- b. **Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

No, the project sites are only accessible by boat.

- c. **Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle, or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

No. The project is to replace anchors and buoys that have reached the end of their design life for mooring buoys.

- d. **Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

The project occurs in water and does not impede water transportation (for example water ferry routes).

- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

No additional vehicle trips are anticipated as a result of this project.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

None anticipated.

- g. **Proposed measures to reduce or control transportation impacts, if any:**

There are no impacts to transportation anticipated so no measures are proposed.

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<sup>16</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>  
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## 15. Public services

[Find help answering public service questions<sup>17</sup>](#)

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

No, the project will not result in increased need for public services. The project is proposing maintenance of existing recreation facilities – mooring buoys adjacent to state parks.

- b. **Proposed measures to reduce or control direct impacts on public services, if any.**

No impacts are anticipated as a result of this project and so no reduction measures are proposed.

## 16. Utilities

[Find help answering utilities questions<sup>18</sup>](#)

- a. **Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other:**

There are no utilities at the project sites.

- b. **Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.**

There are no proposed utilities for this project.

## C. Signature

[Find help about who should sign<sup>19</sup>](#)

**The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.**

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<sup>17</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

<sup>18</sup> <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

<sup>19</sup> <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

X *Devin Sola*

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**SEPA Checklist List of Attachments A**

**– Map of buoys overview**

**B – Design of existing and proposed mooring buoys**

**C – Linear moorage design**

**D – Locations of buoys, anchor type and substrate conditions**

**E – Vicinity maps**

**F – Eelgrass and macroalgae survey data**

**G – State and federally listed threatened and endangered species**

**H – Department of Ecology - Water Quality Atlas Data**