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January 25, 2016

SHANNON & WILSON, INC.
GEOTECHNICAL AND ENVIRONMENTAL CONSULTANTS

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January 25, 2016

Washington State Department of Ecology
3190 – 160th Avenue SE
Bellevue, WA 98008-5452
Sent Via Email: david.pater@ecy.wa.gov and misty.blair@ecy.wa.gov

Attn: Mr. David Pater and Ms. Misty Blair

**RE: SHORELINE EXEMPTION REQUEST FOR ONE PROPOSED GEOTECHNICAL EXPLORATION, MUKILTEO SCIENCE CENTER, NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION, NATIONAL MARINE FISHERIES SERVICE, NORTHWEST FISHERIES SCIENCE CENTER, MUKILTEO, WASHINGTON**

This letter has been prepared for the Washington State Department of Ecology (Ecology) to assist in preparing a Shoreline Exemption to complete one geotechnical exploration on the Mukilteo National Oceanic and Atmospheric Administration (NOAA) parcel located at 21st Street, Mukilteo, Washington. The site is located to the northeast of the Mukilteo ferry terminal. Figures 1 and 2 illustrate the approximate location of the proposed exploration.

Initially, we sent the exemption request to the City for their review and approval; however, they returned it, stating that NOAA is the lead agency and the permits required would need to go through them. In further discussions with NOAA, they requested that I send this to Ecology for processing. On January 22, I spoke with David Pater regarding this matter and we agreed to send the request to Ecology, with the understanding that you would assess how to process this exemption. David also mentioned that a Coastal Zone Management consistency determination may be needed and Ecology would make that determination as well.

The boring will be drilled by an experienced driller under subcontract to Shannon & Wilson, Inc. Drilling will be completed to a depth of approximately 50 feet below ground surface using a 6-inch-diameter mud rotary drill. The boring will be advanced with truck-mounted drill rig, which has an approximate footprint of 12 feet by 40 feet.

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## SHORELINE MANAGEMENT ACT EXEMPTION

The geotechnical exploration will be conducted in compliance with Exemption M of the Shoreline Management Act, as described within Section 173-27-040 of the Washington Administrative Code (WAC). We believe the geotechnical exploration satisfies this exemption because the activity falls under, "site exploration and investigation activities that are prerequisite of an application for development authorization," and because it complies with the following five criteria:

1. **The activity does not interfere with the normal public use of the surface waters.**

   The proposed geotechnical exploration will be located landward and approximately 60 feet from zero tide water line of Puget Sound. The geotechnical exploration will not interfere with normal public use of the project area surface waters (Puget Sound) because it is limited in duration and boring is located in an upland location.

2. **The activity will have no significant adverse impact on the environment including but not limited to fish, wildlife, fish or wildlife habitat, water quality, and aesthetic values.**

   The drilling will occur in an upland location. During drilling, the cuttings will be placed near the site of drilling. Following drilling, cuttings will be left onsite in a location away from the shoreline where sediment will not enter Puget Sound or transport onto the beach. No grading or clearing of native vegetation will be required.

   Impacts to aesthetic values are not anticipated to be significant because (a) the proposed activity is temporary and will leave no permanent visible changes on the environment and (b) anticipated noise and/or vibrations will be temporary and not significantly out of the typical range for the project area.

3. **The activity does not involve the installation of any structure, and upon completion of the activity, the vegetation and land configuration of the site are restored to conditions existing before the activity.**

   The geotechnical exploration methods do not involve any structures. Currently, the boring location is in a gravel parking area, which will be restored as needed after exploration activities are complete and the equipment has been removed from the site.

4. **A private entity seeking development authorization under this section first posts a performance bond or provides other evidence of financial responsibility to the local jurisdiction to ensure that the site is restored to preexisting conditions.**

   The boring is being completed for NOAA, a federal agency; therefore, no financial guarantee will be required. The geotechnical exploration will provide information to be used by design engineers and potential contractors as part of the construction of the

Mukilteo Science Center, scheduled to occur at a later date. Future construction of the science center would be permitted under a formal shoreline substantial development permit.

5. **The activity is not subject to the permit requirements of Revised Code of Washington 90.58.550.**

   The data collected as part of the geotechnical exploration will be used for the design of the Mukilteo Science Center. The activity is not related to oil or natural gas exploration.

## STATE ENVIRONMENTAL POLICY ACT EXEMPTION

The proposed activity is State Environmental Policy Act exempt under Section 197-11-800(18) of the WAC for Information Collection and Research, which states that, "Basic data collection, research, resource evaluation, requests for proposals, and the conceptual planning of proposals shall be exempt." These may be strictly for information gathering, or as part of a study leading to a proposal that has not yet been approved, adopted, or funded; this exemption does not include any agency action that commits the agency to proceed with such a proposal."

If you have any questions or would like clarification of the information provided herein, please call me at (206) 695-6738.

Sincerely,

**SHANNON & WILSON, INC.**

Katie Walter

Katie L. Walter
Natural Resources Manager
Vice President

KLW/jpc

Enc: Figure 1 – Vicinity Map
Figure 2 – Vicinity Map

c: Donn Stone, Rolluda Architects
Rino Balatbat, National Oceanic and Atmospheric Administration

Figure 1
Vicinity Map

Figure 2
Vicinity Map