

30 January 2015

Ms. Sonia Bumpus
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia WA 98504-3172

Re: Clarifications regarding in-water work window
Application for Site Certification No. 2013-01, Docket No. EF131590

Dear Ms. Bumpus:

On 27 January 2015, you requested clarification regarding whether the in-water work window being requested in the recently revised Biological Evaluation (BE) submitted to the U.S. Army Corps of Engineers (USACE) was “adjusted” from that proposed in the Application for Site Certification (ASC), and if “yes,” whether the change was in response to anticipated sequencing of proposed upland and in-water construction activities.

There is no change in the start and end dates of the in-water-work window requested in the BE versus that requested in the ASC. As noted in the ASC, the biological report appended to the ASC, in the Preliminary Draft Environmental Impact Statement, and in the BE, the Applicant is requesting the currently agency-published in-water work window of November 1 to February 28. In reviewing the documents, we did, however, notice a typographical error in the Essential Fish Habitat Appendix to the December 2014 revised BE stating a beginning date of October 1; the window being requested starts November 1.

With regard to your question about the sequencing of upland and in-water work relating to the work window, when the Governor approves the Site Certification Agreement, the applicant will know the true construction start date of the project. At that time, the Applicant will be able to finalize scheduling of the various upland construction activities and in-water activities in terms of the overall project completion timeline.

The Application for Site Certification Supplement submitted in February 2014 indicated that construction activities above the ordinary high water mark would not be restricted to the in-water work window. We are hereby notifying you that the Applicant is making an additional commitment with respect to the timing of pile driving activities associated with Upland Access Trestle Improvements, as indicated below. This commitment is in response to initial comments

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received from the USACE on the BE; this additional restriction for activities to be conducted within the in-water work window provides additional protection to ESA listed species.

Application for Site Certification Supplement (February 2014), Section 2.17.7, Page 2-195

UPLAND ACCESS TRESTLE IMPROVEMENTS

The project will install ground improvements at the upland end of the access trestle and along the shoreline. A series of drilled shafts will be installed at the Berth 13 Trestle abutment. Ground improvements, if required, will consist of vibro-compaction, stone columns, or other similar method that results in the establishment of an area of denser soils through compaction and the placement of additional materials. This work would not be limited to the in-water work window.

Six 24-inch steel pipe piles will also support the access trestle. Pipe pile installation will require use ~~on~~ of an impact pile driver. ~~This work would not be limited to the in-water work window.~~ Upland impact pile driving associated with the Upland Access Trestle Improvements would be conducted within the in-water work window.

Please contact me at 206/431-2373 if you require additional information in response to your information request.

Sincerely,



Irina Makarow

Senior Environmental Planner, Project Manager

IM:keh

cc: Kelly Flint, Savage Services
Jay Derr, Van Ness Feldman