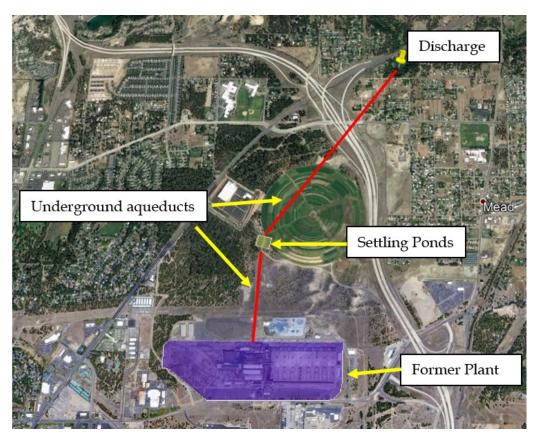
Memo Regarding T&E Species Evaluation:

March 4, 2020

## **Project Location:**

The project area falls in the town of Mead, Spokane County Washington. The address is 2111 E. Hawthorne Road, Mead, WA. The project area resides with the boundaries of three properties connected by an underground stormwater aqueduct. The first parcel a 170-acre parcel that operated as an aluminum smelter from 1942 until approximately 2000. It has been largely inactive since that time. The second property, situated to the north of the plant is dominated by agricultural land use, however a swath of pine forest vegetation exists in between cropland and State Highway 2. In recent years, 25 acres of the forested portion of this property was developed into a Costco Wholesale. Near the center of this property site two constructed and lined stormwater settling ponds; this is the area of this parcel where cleanup will be focused. The ponds then drain through a second underground aqueduct that travels 1.25 miles before discharging at third parcel into Deadman Creek, a tributary of the Little Spokane River.



# **Project Description:**

At the request of Washington Department of Ecology and the Spokane Regional Clean Air Agency, the U.S. Environmental Protection Agency is evaluating an emergency cleanup action at the former Kaiser Mead aluminum smelter site (Site) located at 2111 East Hawthorne Road, Mead, Spokane County,

Washington. The facility was constructed in 1942 but seized smelting operations approximately 20 years ago when Kaiser Aluminum & Chemical Company, that operated the plant, filed for bankruptcy. The property has changed ownership three times since the plant closure. Although one large demolition project was undertaken in 2012 by a previous owner, buildings and infrastructure have gone unmaintained since the plant closure and have fallen into disrepair. Human health and environmental risks have begun to emerge from the Site including the release of extremely high concentrations of carcinogenic polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and asbestos from dilapidated building materials such as building siding (trade name Robertson Siding), pipe insulation, and leftover waste material. Site security provided by the current property owner is intermittent and inadequate to keep unauthorized visitors from accessing the Site and a documented increase in homeless encampments and other trespassers are creating immediate exposure risks. Meanwhile PCBs and PAHs have been shown to be migrating off-site starting from building materials through a storm sewer system and to a discharge point in Deadman Creek, which is a tributary of the Little Spokane River. The Little Spokane River and Spokane River have been designated as "impaired" waterbodies under section 303(d) of the federal Clean Water Act due to the prevalence of PCBs in these watersheds.

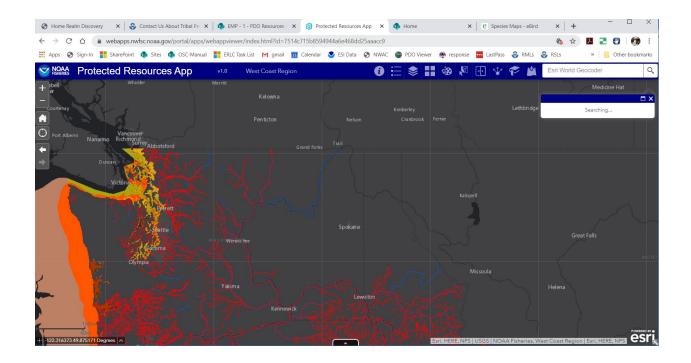
The cleanup project being considered includes:

- 1. Removal of approximately 490,000 square feet of siding containing PCBs and asbestos from approximately 13 buildings on the main plant property (Figure 5);
- 2. Removal of 12,000-21,000 linear feet of asbestos-containing pipe insulation from inside and outside of buildings;
- 3. Removal of waste material in piles and areas where it has accumulated near storm drains.
- 4. Flushing of contaminated sediment from storm sewer aqueducts and removal of contaminated sediment from two lined settling ponds located on a separate property approximately one-third of the way between the main plant property and the point of discharge.

There is no work anticipated at the parcel where stormwater discharges to Deadman Creek.

# **NOAA Species**

Using NOAA's "Protected Resources App" I confirmed on 3/4/20 that no NOAA species or habitats of concern are anywhere near the project area.



# **USF&WS Species (Based on an evaluation of the IPaC Resource List)**

#### **Mammals**

Canada Lynx – This project is within the range of this species, however, this area is not near or itself suitable habitat for Canada Lynx, which needs high elevation sub-alpine meadows in this part of North America where it can prey on snowshoe hare.

https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=3652

Grizzly Bear - This area is not near or itself suitable habitat for Grizzly bear due to the prevalence of industrial, commercial and residential land use. This project is not near the range of this species. <a href="https://ecos.fws.gov/ecp0/profile/speciesProfile?sld=7642">https://ecos.fws.gov/ecp0/profile/speciesProfile?sld=7642</a>

Bull trout – The project area is outside the range of critical habitat and the USFWS species profile shows the site of be outside the range of the species.

(https://ecos.fws.gov/ecp0/profile/speciesProfile?sId=8212)

# **Flowering Plants**

Spalding's Catchfly – This species resides in bunchgrass, sage, and low-density pine forest habitat which does not exist in or with several dozen miles of the project area. The USFWS species profile shows this project area to be well outside the species range, which is more to the south and west of the Spokane metro area. https://ecos.fws.gov/ecp0/profile/speciesProfile?sld=3681

Water Howellia – This species prefers aquatic habitats however it's range falls outside of the project area and outside the Little Spokane River basin (it appears to have range within the main stem of the

Spokane River). The project area does not include aquatic habitat and appears to be dozens of miles from the range of this species. <a href="https://ecos.fws.gov/ecp0/profile/speciesProfile?sld=7090">https://ecos.fws.gov/ecp0/profile/speciesProfile?sld=7090</a>

### **Birds**

Using e-bird data mapping tool, I determined:

- Bald eagles have been observed within 1 mile of the site but not in the project area.
- Black swift no record of detection within several miles of the site
- Brewer's Sparrow no record of detection within several miles of the site
- Cassin's finch closest detection over 1.3 miles from the site. More prevalent in outer lying areas.
- Clark's grebe no record of detection within several miles of the site
- Golden eagle nearest detection several miles away in the area of the Little Spokane River.
- Lesser yellowlegs nearest detection several miles away in a protected wetland area.
- Lewis' Woodpecker nearest detection several miles away in the area of the Little Spokane River.
- Long-billed curlew no record of detection within several miles of the site
- Olive-sided Flycatcher nearest detection several miles away in the area of the Little Spokane River.
- Rufous hummingbird Nearest detection 2.5 miles awa in the area of the Little Spokane River.
- White-headed woodpecker nearest detection several miles away in the area of the Little Spokane River.
- Willet no record of detection within several miles of the site.
- Willow Flycatcher Nearest detection 2.5 miles awa in the area of the Little Spokane River.

# **Lead Agency Determination:**

Due to the current and historical land use within the project area and the lack of species or habitats of concern within the project area, this project will have *no effect* on sensitive natural resources.

Brooks Stanfield
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