



COMMUNITY DEVELOPMENT DEPARTMENT

230 Pioneer Street | PO Box 608 | Ridgefield, WA 98642
(360) 887-3557 | Fax: (360) 887-0861 | www.ci.ridgefield.wa.us

NOTICE OF SEPA THRESHOLD DETERMINATION (DNS) REVIEW Jones - School

File Name: Jones - School PROJ-18-
0004

Date Published: September 13, 2018

Today's Date: September 7, 2018

Attached is an environmental **Determination of Non-significance (DNS)** and associated environmental checklist issued pursuant to the State Environmental Policy Act (SEPA) Rules (Chapter 197-11, Washington Administrative Code). The enclosed review comments reflect evaluation of the environmental checklist by the lead agency, the City of Ridgefield, as required by WAC 197-11. You may comment on this determination within twenty-one (21) days of the DNS publication date of September 13, 2018. The lead agency will not act on the SEPA DNS until the close of the 21-day **comment period which ends at 5:00 PM on October 4, 2018**.

Please address any correspondence to: Ridgefield Community Development Dept.
RE: SEPA - Jones - School PROJ-18-0004
P.O. Box 608
Ridgefield, WA 98642

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RIDGEFIELD COMMUNITY DEVELOPMENT DEPARTMENT

**NOTICE OF
JONES - SCHOOL
SEPA THRESHOLD DETERMINATION (DNS)**

PROJ-18-0004

230 Pioneer St ♦ PO Box 608 ♦ Ridgefield, WA 98642
Ph: 360.887.3557 ♦ Fax: 360.887.2507 ♦ www.ci.ridgefield.wa.us

Date: September 7, 2018

Proponent: City of Ridgefield

Description of Proposal: This non project action is known as the “*Jones – School Comprehensive Plan Amendment*”. The proposed amendments address changes to the development code.

Location: APN 214214002 SW corner of N 10th St. and NW 5th Ave.

Project Proponent & Contact Persons:

Applicant: Ridgefield School District, 2724 Hillhurst Road, Ridgefield, WA 98642 360-619-1302

Don Hardy, BergerABAM, 210 East 13th Street, Suite 300, Vancouver, WA 98660, 360-823-6115

Don.Hardy@abam.com

Lead Agency: The lead agency for this proposal has determined that the proposal does not have a probable significant adverse impact on the environment as a result of compliance with adopted City standards, including the 2012 Ridgefield Shoreline Master Program. An environmental impact statement (EIS) is not required under RCW 43.21C.030 (2)(c). This decision was made after review of a completed environmental checklist, the proposed plan document, and other information on file with the lead agency. Information is available to the public on request at Ridgefield City Hall during normal business hours.

This **DNS** is issued under WAC 197-11. The lead agency shall not act on this DNS for a minimum of 21 days from the date of issuance. Comments on the **DNS** must be submitted to the responsible official c/o the Ridgefield City Clerk by **5:00 PM on Thursday, October 4, 2018**. The City will conduct a hearing on the proposal on **Thursday October 11, 2018 beginning at 6:30 PM** at the **Ridgefield Community Center, 210 N. Main Ave., Ridgefield, WA**. The public is invited to present testimony.

Responsible official: Jeff Niten
Position/title: Community Development Director
Address: P.O. Box 608, 301 N 3rd Ave
Ridgefield, WA 98642
jeff.niten@ci.ridgefield.wa.us

Phone: (360) 857-5013

Signature: 

Jeff Niten, Community Development Director

Issued: September 11, 2018

Appeal: An appeal of the City's SEPA Threshold Determination must be submitted to the Community Development Department within fourteen (14) calendar days after the date issued. This appeal must be written and make specific factual objections to the City's threshold determination. Appeals shall be conducted in conformance with RDC 18.810.205 (Appeals) and any required fees pursuant to RDC 18.810.205.F shall be paid at time of appeal submittal.

An appeal of Type III decisions on Shoreline Substantial Development Permit or Shoreline Variance shall be submitted to Ecology for its final decision. Ecology's final decision may be appealed to the Shoreline Hearings Board in accordance with 90.58.180 and WAC 461-08. Such appeals must be filed within twenty-one (21) days from the date the permit decision was filed. (Ridgefield SMP 7.4.2.3)

SEPA ENVIRONMENTAL CHECKLIST

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.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

The help links in this checklist are intended to assist users in accessing guidance on the checklist questions. Links are provided to the specific sections of the guidance applicable to the questions. However, the links may not work correctly on all devices. If the links do not work on your device, open the guidance at www.ecy.wa.gov/programs/sea/sepa/apguide/EnvChecklistGuidance.html and navigate to the appropriate section.

Use of checklist for nonproject proposals: [\[help\]](#)

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(PART D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. BACKGROUND [\[help\]](#)

1. Name of proposed project, if applicable: [\[help\]](#)

Ridgefield School District: Comprehensive Plan Map and Zoning District Amendments

2. Name of applicant: [\[help\]](#)

Ridgefield School District

3. Address and phone number of applicant and contact person: [\[help\]](#)

Applicant: Ridgefield School District

Attention: Dr. Nathan McCann

2724 Hillhurst Road

Ridgefield, WA 98642

360-619-1302

nathan.mccann@ridgefieldsd.org

Contact: Don Hardy, BergerABAM

210 East 13th Street, Suite 300

Vancouver, WA 98660

360-823-6115

Don.Hardy@abam.com

4. Date checklist prepared: [\[help\]](#)

June 2018

5. Agency requesting checklist: [\[help\]](#)

City of Ridgefield, WA

6. Proposed timing or schedule (including phasing, if applicable): [\[help\]](#)

The proposed comprehensive plan map and zoning district amendments (the proposed amendments) are a non-project action; therefore, the exact timing of future development on the property is unknown. However, the Ridgefield School District (RSD) intends to have an elementary school operating on the property by August 2020.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. [\[help\]](#)

The applicant intends to develop an elementary school on the property contingent on successful comprehensive plan map and zoning district amendments and after the approval of City land use, engineering, and building permits. The school and associated facilities would be constructed in a single phase. No further activities are planned for the site after construction is complete.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. [\[help\]](#)

- *Preliminary Critical Areas Assessment, BergerABAM, 2018*

- *Preliminary Wetland Assessment, Olson Environmental LLC, 2018*
- *Preliminary Fish and Wildlife Habitat Conservation Areas Assessment, Olson Environmental LLC, 2017*
- *Preliminary Traffic Assessment, Kittelson & Associates, 2018*

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. [\[help\]](#)

No other applications affecting the property are known to be pending.

10. List any government approvals or permits that will be needed for your proposal, if known. [\[help\]](#)

RSD is applying for the proposed amendments to change the comprehensive plan and zoning designations of the subject site to Public Facility (PF). The request for the proposed amendments will be reviewed under the annual City review process that is required for all comprehensive plan amendments.

The development of an elementary school on the property will require several permits and approvals, including site plan review, engineering review and approval, critical areas permit(s), site development permits, building permits, and others to be determined as the school design progresses beyond the conceptual phase.

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.) [\[help\]](#)

RSD is seeking to construct a new elementary school, which would be funded by a bond to be voted on in spring 2019. RSD has selected a potential site for the future elementary school. This site, located on tax parcel 214214002 in northeast Ridgefield, is zoned Commercial Neighborhood Business (CNB) and Commercial Regional Business (CRB) and neither zone allows the development of an elementary school. In order to develop the future elementary school on the selected site, RSD is applying for a comprehensive plan map and zoning district amendment that would change the comprehensive plan and zoning designations of the selected site to Public Facilities (PF) (proposed amendments).

The request for the proposed amendments will be reviewed under the City of Ridgefield (City) 2018 annual review process that is required for all comprehensive plan amendments. These requests must be submitted to the City before July 1 as stipulated in the Ridgefield Development Code (RDC), Section 18.320.020(C). This narrative addresses the criteria that apply to requests for comprehensive plan map and zoning district amendments, as identified in RDC Section 18.320. This narrative also discusses the comprehensive plan and subarea policies and goals contained in the City of Ridgefield Comprehensive Plan (the comprehensive plan) and within the Ridgefield Junction Subarea Plan (the subarea plan) that apply to the requests.

The approximately 27.36-acre property, which is located within Ridgefield's Junction Subarea, is south of 10th Street, approximately a half-mile east of Interstate 5 (I-5) in the NW 1/4 of Section 22, T4N, R1E of the Willamette Meridian. The proposed amendments would affect one parcel: 214214002. It is designated Neighborhood Commercial (NC) and General Commercial (GC) and is zoned CNB and CRB. The applicant asks the City to change these designations to a

comprehensive plan designation of Public Facilities (PF), with a corresponding zoning designation of Public Facilities (PF).

The applicant wants to change the designations to PF to allow the development of an elementary school, a land use not allowed in the subject property's current CNB and CRB zones. Rezoning the property to PF would provide the land necessary for the development of the new elementary school that is required to meet the forecasted enrollment detailed in the Ridgefield School District No. 122 Capital Facilities Plan 2015-2021. According to that plan, RSD's current facilities can serve 1,225 elementary school students; however, the elementary student enrollment by the year 2021 is expected to increase to 1,828, an additional 603 elementary school students (kindergarten through sixth grade). If its development is approved by the spring 2019 bond measure, the new school on the site would serve most of this anticipated increase.

- 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. [\[help\]](#)**

The property consists of an approximately 27.36-acre piece of land (parcel 214214002) and is located within the subarea known as Ridgefield Junction. The property is south of 10th Street, approximately a half-mile east of Interstate 5 (I-5), and located in the NW ¼ of Section 22, T4N, R1E of the Willamette Meridian. A vicinity map and topographic map are provided in the preliminary critical areas assessment. A site plan has not yet been developed, as the school facility remains conceptual at this time.

B. ENVIRONMENTAL ELEMENTS [\[help\]](#)

1. Earth [\[help\]](#)

- a. General description of the site [\[help\]](#)

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

The property slopes moderately from northeast to southwest. Most of the site is mapped by Clark County MapsOnline as less than 5 percent or between 5 and 10 percent slopes.

- b. What is the steepest slope on the site (approximate percent slope)? [\[help\]](#)

According to MapsOnline, the steepest slope on the site is a small area in the southwest corner mapped as 10 to 15 percent slope.

- 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. [\[help\]](#)

The Clark County Soil Survey (U.S. Department of Agriculture Natural Resources Conservation Service) identifies three soil types on the property.

Gee Silt Loam, 0 to 8 percent slopes (GeB). Gee soils are deep, moderately well drained soils formed in the old alluvium deposited by the Columbia River. They are moderately permeable in the surface layer and very slow in the subsurface, surface runoff is slow, and the erosion hazard is

slight. In a typical profile, these soils are a very dark grayish brown (10YR 3/2) silt loam in the upper 9 inches. Below this to a depth of 14 inches, they are a dark grayish brown (10YR 4/2) silt loam with yellowish brown (10YR 5/6) concentrations. This soil type is considered non-hydric.

Hillsboro Silt Loam, 0 to 3 percent slopes (HoA) & 3 to 8 percent slopes (HoB). Hillsboro soils are deep, well drained soils formed in the old alluvium deposited by the Columbia River. They are moderately permeable, surface runoff is slow, and the erosion hazard is slight. In a typical profile, these soils are a very dark brown (10YR 3/3) silt loam in the upper 24 inches. This is a non-hydric soil.

Odne silt loam, 0 to 5 percent slopes (OdB). This soil generally occurs in concave areas in drainage ways or depressions within areas of Gee soils. In most places the slope is 1 to 2 percent. In a typical profile, the surface layer is about 10 inches thick. It is mottled, dark-gray heavy silt loam in the upper part. The subsurface layer is firm, mottled, gray silt loam about 9 inches thick. The next 8 inches is very firm, mottled, dark-gray silty clay loam that overlies 6 inches of firm, mottled, dark-gray clay loam. This soil is poorly drained and very slowly permeable. A high water table is common in winter. Clark County classifies OdB soils as hydric.

No agricultural lands of long-term commercial significance have been designated by the City in the vicinity of the property, but land across 10th Street (outside of the City boundary) is designated such by Clark County. These lands are zoned Agriculture 20 (AG-20) under Section 40.210.010 of the Clark County Code (CCC). Per the CCC, “[t]he purpose of the Agriculture 20 district is to encourage the conservation of lands which have the growing capacity, productivity, soil composition, and surrounding land use to have long-term commercial significance for agriculture and associated resource production.” The proposal will not remove or impact any agricultural lands of long-term commercial significance.

The proposed amendments would not directly result in any ground disturbing activities or removal of soils from the site. The eventual development of the property (assumed to be an elementary school) would result in a change of use of the site that would remove the current agricultural use. The extent and quantities of future on-site soil removal or disturbance are unknown at this time, but some soils probably would be removed in order to construct the school and the facilities associated with it (e.g., access roads, sports fields, parking areas, etc.). The school plus these additions is referred to in this document as the “school facility.”

- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. [\[help\]](#)

According to the preliminary critical areas assessment and MapsOnline, the property does not contain designated erosion or landslide hazard areas. In addition, it is rated as a very low to low liquefaction hazard and a Site Class C ground shaking amplification hazard. Therefore, the property does not qualify as a geologically hazardous area per the City’s critical areas provisions of RDC Chapter 18.280.

- 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. [\[help\]](#)

The proposed amendments are a non-project action, and will not result in any ground disturbing activities. If approved, the amendments would permit the future construction of an elementary school on the site. It is anticipated that development of the school would involve excavation, filling, and grading. Specific quantities will be established following the design of the school facility, and will be provided to the City for review during site plan review.

- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. [\[help\]](#)

No ground disturbing activities will occur as a result of the proposed amendments; therefore, the non-project action would not directly result in activities that could cause erosion. Future

development on site would require clearing, construction, and use of the property. These activities can typically cause erosion.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? [\[help\]](#)

The proposed amendments will not result in the addition of impervious surface. Future development of an elementary school, including the school building, access roads, and parking areas, would result in an increase in impervious surfaces. The amount of impervious surface is unknown at this time, but will be provided to the City during the site plan review process required for future development of the property.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: [\[help\]](#)

No immediate control measures are proposed as no ground disturbing activities will occur as a result of the proposed amendments. The future design and development of the school facility will be required to incorporate adequate stormwater management practices and erosion control mechanisms to prevent adverse impacts.

2. Air [\[help\]](#)

- 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. [\[help\]](#)

No air emissions will occur as a result of the proposed amendments. Future development on the site would likely produce air emissions associated with typical construction activities, such as construction vehicle emissions. Once the future elementary school is operational, potential air impacts would include emissions resulting from vehicle traffic to and from the site, emissions generated by the maintenance of the building and landscaping, and emissions generated directly from the operation of the building (quantities and severity are yet to be determined). Emissions associated with the building are anticipated to be non-significant and in keeping with typical emissions from this type of use.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. [\[help\]](#)

Off-site odors will not impact the proposed amendments, as they are a non-project action. The future elementary school may be impacted by off-site odors generated by the adjacent agricultural operations (e.g., spreading of manure for fertilizer); however, these impacts are not anticipated to be significant. Moreover, these impacts would be temporary, given the planned development of the Clark College at Boschma Farms campus on the lands to the south and west of the subject site that are currently in agricultural use. In addition, the Ridgefield Junction subarea plan envisions this area developing as a commercial and industrial employment center, which would further reduce the potential for off-site odors associated with agricultural activities.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any: [\[help\]](#)

No measures are proposed to reduce or control emissions or other air impacts at this time. Future construction and development on the site would be required to comply with local, state, and federal regulations for impacts to air quality, and would be vetted through the City during site plan review.

3. Water

- a. Surface Water: [\[help\]](#)

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. [\[help\]](#)

According to the Washington Department of Natural Resources (DNR) Forest Practices Application Mapping Tool (FPAMT), two streams are mapped within the study area; both are unnamed tributaries to McCormick Creek, which is located north of the project site. The first stream (referred to as Stream 1) is a Type Ns, non-fish-bearing, seasonal stream that is mapped as originating just east of the project site. This stream flows northeast to southwest through the central portion of the site, and discharges to the second stream (Stream 2) mapped on the project site. Stream 2 is mapped as a Type F, fish-bearing stream. It bisects the southwestern corner of the project site, flowing to the northwest. The site investigation by Olson Environmental scientists confirmed the existence of both mapped streams. The Olson Environmental report indicates that both streams have been placed into pipes as they flow through the property. Stream 2 flows into a pipe at the south property line and exits the pipe along the west property line. There is a catch basin at the east edge of the agricultural field that collects the water for Stream 1.

According to the WDFW mapping application PHS on the Web, the site also contains freshwater emergent and riverine aquatic habitat. The mapping is consistent with the findings of the Olson Environmental site assessment and reporting, which identified two wetlands on the property.

- 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. [\[help\]](#)

The proposed amendments are a non-project action, and will not directly result in any ground disturbing activities. In the future, the amendments (if approved) and the land use, engineering, and building permits would allow the construction of an elementary school on the site. It is anticipated that development of the school will involve work over or within 200 feet of the streams/wetlands on site. Future development on the site will require a full wetland delineation to determine the extent, rating, functions, and values of the wetlands, which will in turn dictate the widths of their associated buffers.

- 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. [\[help\]](#)

The proposed amendments are a non-project action, and will not directly result in any ground disturbing activities. In the future, the amendments (if approved) would permit the construction of an elementary school on the site. It is not known if the school would involve any fill or dredge material being placed or removed from the existing surface waters and wetlands, or what the source of the fill material (if used) would be. If it turns out that future development will involve these actions, then the proposed wetland and stream impacts would be reviewed under the City's critical areas ordinance during site plan review, and the project will be required to obtain necessary approvals and/or permits from the City and applicable state or federal agencies.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [\[help\]](#)

The proposed amendments will not result in any surface water withdrawals or diversions. Any future development on the site will need to address the two streams that run through the property. If a diversion is required, then RSD will be required to work with the City and appropriate state agencies to obtain necessary approvals and permits, and to mitigate for impacts as required by local, state, and federal regulations. Compliance with these regulations would be determined during site plan review.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. [\[help\]](#)

According to Federal Emergency Management Agency (FEMA) flood insurance rate map (FIRM) Map No. 53011C0208D, the project site is not located within a floodplain or area of special flood hazard.

- 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. [\[help\]](#)

The proposed amendments are a non-project action, which would not require the discharge of waste materials to surface water. Design of the future elementary school is currently conceptual in nature. If the design requires the discharge of waste materials to surface waters, this will be vetted through all applicable agencies.

b. Ground Water:

- 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 general description, purpose, and approximate quantities if known. [\[help\]](#)

No groundwater will be withdrawn for drinking water or other purposes because of the approval of the proposed amendments or any future development on the site. Sufficient water services are located proximate to the site via Clark Public Utilities (CPU) and the City. Future school development will be required to connect to a water service and the future elementary school will not require discharge to ground water.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: 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. [\[help\]](#)

The proposed amendments will not result in any discharges into the ground. Although future development has yet to be determined (beyond the intention to construct an elementary school), it is unlikely that any discharges will occur as a result of the proposed amendments since the school development would be connected to a public sewer system. Because there is sanitary sewer service in the area, connection to this service is anticipated and the use of septic tanks is not foreseen.

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. [\[help\]](#)

The proposal is a non-project action; therefore, there will be no direct impacts from water runoff. Future development, including an elementary school, would likely increase impervious surfaces on site, which would in turn contribute to runoff. Stormwater generated by future development on the site will be collected, treated, and discharged in accordance with all applicable local and state standards.

- 2) Could waste materials enter ground or surface waters? If so, generally describe. [\[help\]](#)

No waste materials will enter the ground or surface waters as a result of the proposed amendments. The current use of the site is a hay field, which may be generating runoff laden with contaminants such as pesticides, fertilizers, and other agricultural byproducts. Future development of the site will require the design and installation of stormwater infrastructure meeting all applicable local and state specifications.

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

The proposal is a non-project action; therefore, there will be no impacts to surface, ground, or runoff water, or to drainage patterns. Future development on site may impact drainage patterns by increasing impervious surfaces, etc. However, this will be assessed on a project-specific basis once the design of the elementary school advances past the conceptual stage.

- d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

The proposal is a non-project action; therefore, there will be no direct impacts to surface, ground, or runoff water, or to drainage patterns. Pending approval of the proposed amendments, the construction of the school facility will be required to adhere to City standards. As indicated on MapsOnline, most of the site is within a Category II critical aquifer recharge area (CARA), with a portion of the eastern corner of the site within a Category I CARA. The same portion that is characterized by the Category I CARA is also identified as a wellhead protection area and is within the 1-year time of groundwater travel, and the southeast corner of the site is within the 5-year time of groundwater travel (Clark County 2018). The Troutdale Aquifer, which is mapped throughout most of Clark County, including all of Ridgefield, has been designated by the U.S. Environmental Protection Agency (EPA) as a sole source aquifer. The EPA defines a sole source aquifer as one where the aquifer supplies at least 50 percent of the drinking water for its service area and there are no reasonably available alternative drinking water sources should the aquifer become contaminated.

Given these site conditions, the future development of the site would require compliance with the City's critical areas provisions for development within CARAs (RDC 18.280.140.) It should be noted that these same conditions would apply to the development of the property if its development were permitted under the existing zone and comprehensive plan designations. The future development of an elementary school on the site will also require compliance with the City's adopted stormwater regulations. Compliance with the City's CARA regulations and adopted stormwater regulations will ensure that surface and groundwater resources are protected from impacts related to new development.

4. Plants [\[help\]](#)

- a. Check the types of vegetation found on the site: [\[help\]](#)

deciduous tree: alder, maple, aspen, other

evergreen tree: fir, cedar, pine, other

shrubs

grass

pasture

X crop or grain

_____ Orchards, vineyards or other permanent crops.

X wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other

_____ water plants: water lily, eelgrass, milfoil, other

_____ other types of vegetation

Vegetation on the property was identified by the preliminary wetland assessment, the preliminary fish and wildlife habitat conservation areas assessment, and the preliminary critical areas assessment. Most of the site is devoted to agriculture, primarily small grain crops and hay. A crop of trees is located along the eastern edge of the L-shaped site. Other vegetation on the site consists of planted grassland seed mixture, Oregon ash (Fraxinus latifolia) tree cover, red-osier dogwood (Cornus alba) shrub stratum, and reed canary grass (Phalaris arundinacea).

- b. What kind and amount of vegetation will be removed or altered? [\[help\]](#)

The proposal is a non-project action; therefore, no vegetation will be removed or altered as part of the project. Future development of an elementary school on this property will require the removal and alteration of existing vegetation, including the crops now on the site. Exact impacts to on-site vegetation cannot be determined until a site plan for the school has been developed. Measures to reduce impacts to vegetation are discussed under item (d) below.

- c. List threatened and endangered species known to be on or near the site. [\[help\]](#)

For the preliminary wetland assessment report, scientists consulted the Washington Department of Natural Resources (DNR) - Natural Heritage Program (NHP) to determine the presence of endangered, threatened, or rare plants within the vicinity of the study site and determined that no threatened or endangered plant species are known to be on or near the project site.

- d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: [\[help\]](#)

The proposal is a non-project action; therefore, no impacts to vegetation will result directly from the project. Post-approval of the proposed amendments, an elementary school would be constructed on the property. Design of the future elementary school is conceptual in nature, but school landscaping would adhere to the applicable City standards.

According to RDC 18.260.070(D)(2)(a), elementary, middle, and high school campuses have a minimum 15 percent landscaping requirement in addition to the landscaping standards contained in RDC Chapter 18.725 (Landscaping). These additional landscaping standards are unique to development within the PF zone, and would help minimize off-site land use impacts through additional buffering and screening.

The City landscaping standards are enumerated in RDC 18.725, and they encourage landscaping that will reduce erosion and stormwater runoff, the use of drought-resistant native species, and maintaining or replacing existing vegetation. The project's compliance with landscaping requirements will be determined during site plan review, once the site plan and school facility have been designed.

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

According to the preliminary wetland assessment report, ground cover near the wetland in the northeast corner of the property is predominantly reed canary grass, a plant categorized as a Class C noxious weed by RCW 17.10.140. Class C status allows a county to enforce control if it is beneficial to that county. Reed canary grass is not identified on the 2018 Clark County Weed Board

Noxious Weed List, but is identified on the City's Nuisance Plant List in RDC 18.830.050. No other noxious weeds or invasive plant species are known to be on or near the site.

5. Animals

- a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. Examples include: [\[help\]](#)

birds: **hawk**, heron, **eagle**, **songbirds**, **other: geese, ducks, etc.**

mammals: deer, bear, elk, beaver, **other: coyotes, raccoons, opossums, etc.**

fish: bass, salmon, trout, herring, shellfish, **other: sculpin, minnows, etc.**

No birds or animals were identified during field visits to the property, and PHS on the Web does not identify any species on the property. The animal species identified above are considered likely or potentially present based on site conditions. Because pipes convey both streams through the property, field verification of the presence of fish (or other aquatic) species was not possible. The potential for sculpin and/or minnows was identified as possible given site conditions, but their presence remains unconfirmed due to the piping.

- b. List any threatened and endangered species known to be on or near the site. [\[help\]](#)

No species listed as threatened or endangered or their habitats were identified on site, either through field verification or literature review. While Stream 2 is mapped as a fish-bearing (Type F) stream, according to the FPAMT it is not mapped as potential habitat to support life stages of resident and anadromous fish species listed by state and/or federal agencies.

- c. Is the site part of a migration route? If so, explain. [\[help\]](#)

The general project area is within the Pacific Flyway, a broad migratory corridor that extends from Alaska to Central America and is used by many different species of migratory birds.

It is not known whether fish species use Stream 2 for migration purposes. While Stream 2 is mapped as a fish-bearing (Type F) stream, according to the FPAMT it is not mapped as potential habitat to support life stages of resident and anadromous fish species listed by state and/or federal agencies. Stream 2 is not identified as a migration route for fish species by PHS on the Web.

- d. Proposed measures to preserve or enhance wildlife, if any: [\[help\]](#)

The proposal is a non-project action; therefore, no impacts to wildlife will occur as a result of the project. Future development of an elementary school on this property would be subject to the provisions of the applicable subsections of the ordinance, specifically RDC 18.280.110 - Fish and wildlife habitat conservation areas and RDC 18.280.150 - Wetlands. The presence of critical areas indicates the need for a City critical areas permit to address the critical areas/natural resources identified on the site and the criteria for approval during the City's land use review process that are included in the ordinance.

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

No invasive animal species are known to be on or near the project site.

6. Energy and Natural Resources

- 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. [\[help\]](#)

The proposal is for comprehensive plan map and zoning district amendments, a non-project action that will have no direct effect on energy and natural resources consumption. The future elementary school that would be constructed on the property as a result of approval of the proposed amendments would require electricity for power and may potentially require natural gas for kitchen operations.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. [\[help\]](#)

The proposal is a non-project action that would have no direct effect on solar usage by adjacent properties. Because of the 35-foot maximum building height limitation in the PF zone and the mandatory 20-foot setbacks, the future development of an elementary school on the property would not conflict with neighboring properties' ability to collect and use solar energy. These development standards will ensure that the future elementary school is located away from property lines, and will restrict the height of the school so that the building will not shade neighboring properties.

- 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: [\[help\]](#)

This proposal is a non-project action; therefore, no energy conservation features are included or required. The future elementary school will likely utilize LED lighting to reduce electricity usage. Information about other energy conservation features will be provided when project-specific designs have been produced.

7. Environmental Health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe. [\[help\]](#)

The proposal is a non-project action; therefore, no environmental health hazards will result directly from the project. After the approval of the proposed amendments, an elementary school would be constructed on the property. While the design of the future elementary school is conceptual in nature, it is possible that the school may require a back-up diesel generator. Diesel generators could present a marginally increased risk of exposure to chemicals, fire and explosion, spill, or hazardous waste. However, if a backup diesel generator is required, proper containment (metal casing around the generator, spill pad, etc.) will be employed to avoid/minimize environmental health impacts.

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

Since 1955—more than 60 years--the property has been used for agriculture. It is possible that soils on the property contain higher than normal quantities of pesticides and fertilizers. A review of the Washington State Department of Ecology Facility/Site database identified no cleanup sites or indications of soil contamination on the project site related to this use. Therefore, other than the potential for higher than normal quantities of fertilizers/pesticides, no contaminants are anticipated to be present.

- 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.

As the proposal is a non-project action, hazardous chemicals/conditions would have no effect on the project. The only known condition within the vicinity of the property that could potentially be hazardous is the 4-inch diameter natural gas line within the 10th Street right-of-way. The future construction of an elementary school on the property will require extending this natural gas line to the site.

- 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.

The proposal is a non-project action that would not require the use or storage of toxic or hazardous chemicals. During construction of the school, fossil fuels may be stored on the site for equipment fueling. In addition, hot asphalt may be brought to the site during the construction of the parking areas. Once the project has been completed, a backup diesel generator may be installed, and fertilizers and pesticides may be used for landscaping maintenance.

- 4) Describe special emergency services that might be required.

Neither the proposed project nor the future elementary school will require special emergency services.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

No measures to reduce or control environmental health hazards are proposed or required, as the comprehensive plan map and zoning district amendments will not directly result in environmental health hazards. Measures to control environmental health hazards will be utilized, if necessary, for the future elementary school. These control measures will be enumerated during the City's land use and development review process.

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [\[help\]](#)

The proposal is a non-project action; therefore, there are no sources of noise that could impact the proposed project directly. Approval of the proposed amendments would lead to the construction of an elementary school on the property. Agricultural work on the land adjacent to the property would likely produce noise while the school was in session; however, the impact of the noise produced by the adjacent agricultural operation(s) probably would be negligible. Moreover, the parcels adjacent to the south and west borders of the property are planned for eventual redevelopment into the Boschma Farms campus of Clark College. Once the land adjacent to the property has been converted from an agricultural to an educational use, no noise impacts are anticipated.

- 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. [\[help\]](#)

The proposed amendments would not result in any noise, as they are a non-project action. The future construction of the school facility would result in short-term noise impacts. To minimize short-term noise impacts, construction hours and noise levels will adhere to the City standards located in RDC 9.14.010. The City permits construction between 7 AM and 10 PM, Monday through Friday, and from 9 AM to 6 PM on Saturday, Sunday, and City holidays. Construction outside the permitted hours is allowed if City administrative approval is given.

Long-term noise will be generated by normal school operations as would be expected for this type of land use. The parking lot and vehicle traffic to and from the site should not be major noise sources, and the building's HVAC systems will need to be designed to comply with state

noise standards. Other noise will be produced during recess, when students use the play equipment/recreation areas outside the building. Overall, the long-term noise generated by the future elementary school will not create a significant adverse impact to uses in the surrounding area.

3) Proposed measures to reduce or control noise impacts, if any: [\[help\]](#)

The proposed project is a non-project action; therefore, no mitigation measures are proposed or required to control noise impacts. Mitigation measures to control noise impacts generated by the future elementary school may include but will not be limited to compliance with the City's permitted hours of construction, limiting the hours of school operation, and developing the site in compliance with appropriate landscaping and buffering standards.

8. Land and shoreline use

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. [\[help\]](#)

The property is currently in agricultural use as a hayfield. Uses surrounding the property include a single-family residential subdivision north of and adjacent to the property, single-family residential north of 10th Street, and agricultural land to the east, south, and west. However, the land to the south of the subject site is proposed to be the future home of the Clark College at Boschma Farms campus. The first building associated with that campus is anticipated to be constructed in 2020.

The proposed amendments will not affect current land uses on nearby or adjacent properties. The new elementary school is compatible with residential and agricultural land uses by incorporating standard mitigations in the RDC as addressed in other sections of this SEPA. The future elementary school will not lead directly to changes in land use on nearby or adjacent properties.

b. 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 as a result 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? [\[help\]](#)

The property is currently in agricultural use as a hayfield. Although it is in agricultural use, the subject parcel has commercial zoning designations of Commercial Neighborhood Business (CNB) and Commercial Regional Business (CRB), and agricultural uses are not explicitly permitted under any of the zoning designations in the City. While no changes to the site would occur as a direct result of the proposed amendments, it can be assumed that future development on the site (i.e., an elementary school) would remove the entire property (27.36 acres) from agricultural use.

Properties designated as agricultural lands of long-term commercial significance by Clark County are zoned AG-20 under RDC 40.210.010. Lands zoned AG-20 are located north of the property, across 10th Street. The proposal will not remove or impact any agricultural lands of long-term commercial significance.

Properties designated as forest lands of long-term commercial significance by Clark County are zoned Forest 40 (FR-40) under RDC 40.210.010. There are no lands zoned FR-40 within the vicinity of the property.

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:

The proposed amendments would not affect or be affected by surrounding uses. Future development on the site of an elementary school could experience temporary and negligible effects from the surrounding agricultural uses (potential traffic delays, noise and odor impacts,

etc.). However, the land to the south and west of the subject site will likely be home to the future Clark College at Boschma Farms campus. Once this planned development occurs (the first building is slated to be constructed in 2020), it is unlikely that an elementary school on this property will affect or be affected by the agricultural uses in the area.

- c. Describe any structures on the site. [\[help\]](#)

There are no existing structures on the site.

- d. Will any structures be demolished? If so, what? [\[help\]](#)

Not applicable – there are no existing structures on the site.

- e. What is the current zoning classification of the site? [\[help\]](#)

The subject parcel has a zoning designation of CNB and CRB. The proposed amendments will rezone the site to PF in order to permit an elementary school.

- f. What is the current comprehensive plan designation of the site? [\[help\]](#)

The subject parcel has a comprehensive plan designation of Neighborhood Commercial (NC) and General Commercial (GC). The proposed amendments will re-designate the site to PF in order to permit an elementary school.

- g. If applicable, what is the current shoreline master program designation of the site? [\[help\]](#)

Not applicable. Per the City's Shoreline Master Program (2012), the property is not located within shoreline jurisdiction.

- h. Has any part of the site been classified as a critical area by the city or county? If so, specify. [\[help\]](#)

Several critical areas are located on the property, including fish and wildlife habitat conservation areas, CARAs, and wetlands, as described below. More detailed information about these critical areas is contained in the preliminary critical areas assessment, preliminary wetland assessment, and preliminary fish and wildlife habitat conservation areas assessment (on file with the City).

According to WDNR's FPAMT, two streams are mapped within the study area and are mapped as fish and wildlife habitat conservation areas; both are unnamed tributaries to McCormick Creek, located north of the project site. The first stream is a Type Ns, non-fish-bearing stream that is mapped as originating just east of the project site. This stream flows northeast to southwest through the central portion of the site, and discharges to the second stream mapped on the project site. The second stream is mapped as a Type F, fish-bearing stream. While the streams flow through pipes, they are still regulated under the City's critical areas protection ordinance, and the project will be subject to the provisions of RDC 18.280.110, including requirements for protective riparian buffer widths and mitigation and monitoring for any proposed impacts. Both streams and their associated buffers are mapped as riparian habitat conservation areas. The Type F stream is subject to either a 150-foot or 125-foot regulatory riparian buffer; the Type Ns stream is subject to either a 100-foot or 50-foot riparian buffer. However, because the two streams are piped, the level of their habitat functionality, the extent of buffers on the ground, and the applicability of certain portions of the fish and wildlife habitat conservation areas ordinance are yet to be determined. These determinations will be based on more detailed habitat and wetland studies that will be conducted before the submittal of a site plan review application.

The project area is located within a CARA, the Troutdale Aquifer, and a wellhead protection area. As mentioned above, most of the site is mapped as a Category II CARA, with a portion along the eastern boundary identified as a Category I CARA. The project will be subject to the applicable provisions of RDC 18.280.140, which include the submission of a critical areas report, and regulate the use and/or discharge of hazardous substances and the discharge to surface and/or groundwater resources.

Two wetlands were identified within the project site by the Olson Environmental preliminary assessment. A more formal wetland delineation will be completed at the site permitting stage. If the presence of wetlands is confirmed, they will be subject to the City's ordinance (RDC Chapter 18.280.150). Any proposed impacts to the wetlands are also subject to state and federal regulations and provisions related to mitigation and monitoring. The wetlands must be identified in accordance with the U.S. Army Corps of Engineers Wetland Delineation Manual (1987) and the regional supplement (2010), and also must be rated using the Washington State Wetland Rating System for Western Washington: 2014 Update in order to determine the requirements for buffers and/or mitigation.

For any future development involving ground disturbing activity, the presence of critical areas indicates the need to obtain a City critical areas permit to address the critical areas/natural resources identified on the site and the criteria for approval during the City's land use review process. It should be noted that the critical areas identified were determined using readily available data sources and best professional judgment of the scientists. More extensive delineations and surveys will be required for site development applications.

- i. Approximately how many people would reside or work in the completed project? [\[help\]](#)
No one will live at the elementary school, but it will have 35 full-time and 20 part-time employees.
- j. Approximately how many people would the completed project displace? [\[help\]](#)
The site is currently in use as a hayfield, and no people would be displaced as a result of the proposed amendments or the development of the elementary school.
- k. Proposed measures to avoid or reduce displacement impacts, if any: [\[help\]](#)
No measures are proposed to avoid or reduce displacement impacts, as no displacement will occur as a result of the project.
- l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [\[help\]](#)

Because this is a non-project action, no mitigation measures are proposed. Measures may be required in the future when site development is proposed. Clark College has purchased/received via donation parcels 214199000, 214195000, 214196000, 214197000, and 214247000; they are located adjacent to and southwest of the elementary school property and Clark College will convert them to an educational use – Clark College at Boschma Farms, with construction scheduled to begin in 2020. The master planned campus is envisioned as a mix of commercial and residential uses along N 65th Street, with the college campus located southwest and adjacent to the property. The college campus will be constructed near the future elementary school and the uses will complement each other by providing educational services that will appeal to a wide variety of people and a range of age groups.

Impacts to the residential areas to the north will be mitigated through landscaping and appropriate measures to address traffic impacts. These mitigation measures are identified under Housing (9c) below, and will be further identified once the site plan for the school has been developed and a detailed traffic impact analysis has been conducted.

The Ridgefield Junction subarea plan identifies the property and general area as Office District, which specifies restrictions on businesses with high nuisance factors. Therefore, future development in the area will likely be compatible with the elementary school, as will be verified during site plan review for any new developments in the area.

- m. Proposed measures to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance, if any:

There are no forest lands of long-term commercial significance in the vicinity of the property. Agricultural lands of long-term commercial significance are located north of the property, across 10th Street. An elementary school across the street from these lands is not anticipated to impact them.

9. Housing

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

As a non-project proposal, no housing units are proposed with the comprehensive plan map and zoning district amendments. In addition, the future development of an elementary school on the property will not include any housing units.

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

As a non-project action, the proposed comprehensive plan map and zoning district amendments will not result directly in the elimination of housing units. Future development of an elementary school on the property will not eliminate housing units, as there are no housing units on the parcel.

- c. Proposed measures to reduce or control housing impacts, if any: [help]

Neither the non-project action nor the future elementary school will result in adverse housing impacts, as no housing will be eliminated or added. Therefore, no mitigation measures are proposed.

10. Aesthetics

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

No buildings or structures are proposed in conjunction with this request for comprehensive plan map and zoning district amendments. As the future elementary school is still conceptual, specific design elements, including principal exterior materials, have yet to be determined.

- b. What views in the immediate vicinity would be altered or obstructed? [help]

The proposal is a non-project action that will not directly result in any construction activities; therefore, no views will be altered or obstructed. Design of the future elementary school is conceptual in nature; specifics regarding alteration or obstruction of views as a result of development of the future elementary school cannot be provided at this time. View impacts, if any, and necessary mitigations will be determined when development is proposed.

- c. Proposed measures to reduce or control aesthetic impacts, if any: [help]

Because this is a non-project action, the proposal does not include the construction of building/structures that would result in aesthetic impacts; therefore, no aesthetic control measures are proposed. In addition, although aesthetic impacts, if any, have yet to be determined, the future elementary school will be required to comply with development standards included in RDC 18.260 (Public Facility District) and RDC 18.725 (Landscaping) including setbacks and landscaping standards.

11. Light and glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur? [\[help\]](#)

The proposal is a non-project action; therefore, no light or glare would be produced. It is anticipated that the future elementary school would produce light and glare – the school building itself would produce light, both indoors and outdoors, and the designated parking areas also probably would produce light. Lighting would be required during low-light conditions (early in the morning, late in the day, and at night), but the building lights would likely be turned off after school staff have left the building. Parking lot lighting would remain on even while the school is closed, but would likely be downward-directed to minimize glare. Specific lighting and glare impacts will be more fully addressed at the site development stage.

- b. Could light or glare from the finished project be a safety hazard or interfere with views? [\[help\]](#)

Because this is a non-project action, the proposal does not include construction of building/structures that would themselves result in light or glare impacts. As stated above, the school building and parking lot areas would have lighting, but their light and glare impacts, if any, would be addressed at the site development stage. Development of the elementary school will require compliance with the City's lighting standards during site plan review, and, as the City requires, the school design would seek to minimize the amount of off-site light and glare impacts.

- c. What existing off-site sources of light or glare may affect your proposal? [\[help\]](#)

Off-site light or glare will have no impact on the non-project action proposal. Existing land uses within the vicinity of the subject parcel consist of single-family residential and agriculture. Neither of these land uses is a significant producer of off-site light or glare. Therefore, future development of an elementary school on the property will not be negatively impacted by off-site sources of light or glare.

- d. Proposed measures to reduce or control light and glare impacts, if any: [\[help\]](#)

Project-specific development of the future elementary school (pending the approval of the comprehensive plan map and zoning district amendments) would require compliance with the City's exterior lighting standards (RDC Chapter 18.715), which seek to minimize off-site light and glare impacts. Depending on the design of the school, the City may require the future elementary school to utilize downward-directed and shielded exterior lighting; a photometric lighting analysis will be included with the site plan review application, which will satisfy the requirements of RDC 18.715 (Exterior Lighting).

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? [\[help\]](#)

There are no existing informal or designated recreational opportunities in the immediate vicinity of the project site. The nearest recreational facility is the East Fork Lewis River Greenway, which is over a mile from the project site. The proposed trail system map in the Ridgfield Parks & Recreation Comprehensive Plan (2014) shows a "potential trail corridor," identified as the McCormick Creek Trail (T20). The trail appears to cross the southwest corner of the property, following the Type F stream (which is a tributary to McCormick Creek). The potential trail is included in the plan's 6-Year Capital Facilities Plan (2014-2019). The proposed amendments will not have any impact on recreational facilities. Because the school is conceptual at this point, it is unknown what impacts it will have. Likely impacts and appropriate mitigation measures will be identified during the site plan review process, once the proposed site plan for the school is known and impacts can be identified.

- b. Would the proposed project displace any existing recreational uses? If so, describe. [\[help\]](#)

Because this is a non-project action, the project will not displace any existing recreational uses. In addition, there are no existing recreational uses on the subject site, and, therefore, future development will not displace recreational uses.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [\[help\]](#)

Because this is a non-project action, no mitigation measures are proposed as there will be no impacts to recreational uses. Although not a required mitigation since no impacts to recreational uses will result from development of the school, it is likely that school facilities, such as sports fields and playground equipment, will be available for public use during non-school hours. This would be established at a later date when the future elementary school progresses beyond conceptual design.

13. Historic and Cultural Preservation

- 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 located on or near the site? If so, specifically describe. [\[help\]](#)

As a non-project action, the proposed amendments will not result directly in any development activities that would have the potential to impact historic or cultural resources. MapsOnline was consulted during the development of this checklist, and no listed or eligible structures were identified on the property. The presence or absence of buildings, structures, or sites will be evaluated further before site plan review.

- 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. [\[help\]](#)

Because this is a non-project action, no site-specific professional studies for cultural resources have been conducted that the applicant is aware of. The state's archeological predictive model, as reported through MapsOnline, shows almost the entire property is within a high-probability area for the discovery of archaeological artifacts. Given the high-probability designation, a cultural resources survey will likely be required for any development on the site, to satisfy RDC 18.810.200(D) ("Preserve important historic, cultural and natural aspects of our national heritage").

- 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. [\[help\]](#)

Because this is a non-project action, no professional studies of cultural resources have been conducted. MapsOnline shows most of the site as within a high-probability area for the discovery of archaeological artifacts. Given the high-probability designation, a cultural resources survey may be required for any development on the site, to satisfy RMC 18.810.200(D) ("Preserve important historic, cultural and natural aspects of our national heritage").

- 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.

As a non-project action, the proposed amendments will not result directly in any development activities, which would have the potential to impact historic or cultural resources. Future development will likely require an archaeological predetermination, and concurrence from the Washington State Department of Archaeology and Historic Preservation (DAHP) will likely be

required. Given the high-probability designation, a cultural resources survey may be required for any development on site depending on the findings of the predetermination. DAHP concurrence with the findings of the archaeological survey, if required, would also be necessary to satisfy RDC 18.810.200(D) (“Preserve important historic, cultural and natural aspects of our national heritage”).

14. Transportation

- 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. [\[help\]](#)

The property borders 10th Street to the north. 10th Street is designated as a collector street by the City of Ridgefield 2016-2035 General Facilities Capital Facilities Plan. In addition, the City's capital facilities plan anticipates a future street (project N15) that would extend from 65th Avenue east to 85th Avenue classified as an industrial/commercial collector. Once constructed, this future street will lie adjacent to the property's southern property line. Although design of the future elementary school is conceptual in nature, and contingent upon a successful comprehensive plan map amendment and rezone of the property, it is anticipated that the site would be accessed via 10th Street. Based on current/anticipated future Ridgefield development patterns, it is likely that a majority of students attending the school will live on the west side of I-5. As such, the N 65th Avenue and 10th Street corridors are anticipated to serve as the primary travel route to/from the school.

- 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? [\[help\]](#)

Public transportation services are limited within City limits, but there are transit options within the vicinity of the property. C-TRAN's Connector provides Ridgefield with fully accessible dial-a-ride (reservation based service) and scheduled stop service (no reservation required) at designated stops within the service area. According to the C-TRAN service map, the nearest transit stop is located approximately 0.30 mile to the southwest of the property at the N 65th Avenue/N 1st Circle intersection park and ride. From the park and ride, additional connections can be made to Camas, Vancouver, and Portland.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [\[help\]](#)

Because this is a non-project action, the project will not create any parking areas at the property. The number of parking spaces that would be required for the school facility is unknown, and a final determination would follow the development of the site plan. However, according to RSD, the future elementary school is expected to have a maximum capacity of 550 students and is expected to employ approximately 35 full-time and 20 part-time employees. Preliminary designs anticipate approximately 138 parking spaces to accommodate the anticipated occupancy numbers.

There are no existing parking spaces at the project site, and therefore neither the non-project action nor any future development would eliminate parking spaces on the property.

- d. 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). [\[help\]](#)

Because this is a non-project action, the project will not require any improvements to the existing transportation system. A transportation impact study will be prepared for the site plan review process that is required before development permits can be issued for the future elementary school. This study will address the specific off-site improvements, frontage improvements, and site access improvements needed to support the elementary school.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. [\[help\]](#)

The property is not within the vicinity of water, rail, or air transportation.

- f. 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? [\[help\]](#)

Because this is a non-project action, the project will not generate any traffic. According to the transportation impact letter by Kittelson & Associates, the future elementary school is expected to have a maximum capacity of 550 students, and generate approximately 248 weekday AM peak hour trips and 83 PM peak hour trips. The projected peak hour trip generation is preliminary, based on conceptual-level design detail of the school. A formal transportation impact study will be submitted to the City for review during the require site plan review process required before development permits can be issued. Exact peak hour trip generation estimates will be provided at that time.

- g. 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.

The non-project action will not affect or be affected by the movement of agricultural and forest products on roads or streets in the area.

The future school could impact farms and be impacted by farms in turn. The construction of road and intersection improvements for the school use may affect agricultural uses, and the school use may be affected by having to share the roadway with slow-moving agricultural equipment slowing traffic for short durations after the school is constructed. Future development of an elementary school on the property may be impacted by the movement of agricultural products for surrounding farms by causing minor traffic delays associated with farm equipment using surrounding roads for short durations. These impacts could occur during the construction of the facility (e.g., road closures), or through changes to traffic patterns once the school facility is completed. Specific traffic impacts will be determined in the formal transportation impact study which will accompany site plan review.

- h. Proposed measures to reduce or control transportation impacts, if any: [\[help\]](#)

Because this is a non-project action, there will be no impacts to transportation and no mitigation measures are proposed at this time. In the future, a formal transportation impact study will be required for the development of an elementary school on the property. The study, which will be submitted in conjunction with the site plan review application, will identify specific impacts to transportation and identify appropriate controls to address them.

15. Public Services

- 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. [\[help\]](#)

Because this is a non-project action, there will be no change to the need for public services. Future development of an elementary school on the property will provide a public service (an elementary school) to an underserved area of Ridgefield. The need for any additional public services will be evaluated during the site plan review process.

- b. Proposed measures to reduce or control direct impacts on public services, if any. [\[help\]](#)

Because this is a non-project action, there will be no change to the need for public services and no mitigating measures are proposed. The adequacy of and need for additional public services to

support the anticipated future elementary school on the site will be evaluated during site plan review.

16. Utilities

- a. Circle utilities currently available at the site: [\[help\]](#)

electricity, natural gas, water, **refuse service, telephone**, sanitary sewer, septic system, other _____

Because this is a non-project action, there will be no change to the need for utilities on the site. According to a preliminary utilities assessment conducted by Robertson Engineering for the property, water and sewer utilities required for school operation do not currently exist on the property; however, all required utilities are available nearby and can be extended to the site.

- 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. [\[help\]](#)

Because this is a non-project action, there will be no change to the need for utilities on the site. Future development of an elementary school on the property will require the extension of utilities to the property.

The subject parcel is currently served by natural gas – NW Natural operates a 4-inch diameter line in 10th Street – and electricity and data – a CPU-operated overhead utility line adjacent to the site on 10th Street contains these utilities. The existing natural gas, electricity, and data utilities can be extended to serve the site.

Neither water nor sewer are currently available at the site.

The property is located within the service area of the Clark Regional Wastewater District for sanitary sewer. Although sanitary sewer infrastructure does not currently extend to the site, these services are available nearby. According to the City (section 8 of the pre-application conference notes), two pump stations (North Junction pump station and Pump Station #5), trunk lines, and force mains, are needed to convey sewage from the project site to the existing sanitary sewer system. The Wastewater District is moving forward with its plans to construct the North Junction pump station and associated trunk lines. This project will extend sewer to 65th Avenue to approximately the 10th Street intersection. The North Junction pump station and trunk project is scheduled for 2019 construction pending approval of environmental permits and easements.

It is the project team's assumption that another development would extend sanitary sewer to the proposed Pump Station #5 in 2019. That pump station will be located just west of the property, along 10th Street. Future development of the property would then extend sanitary sewer infrastructure from Pump Station #5 to the site. In the event that another development does not precede the development of the future elementary school, RSD would be responsible for extending sanitary sewer to the future Pump Station #5 (reimbursable cost), and then for extending sanitary sewer to the property. The new sewer line will be sized to convey effluent flow from the new school and any required upstream basins.

Water service is available from either the City or CPU via a water main in 10th Street (CPU facility), an existing intertie at the 10th Street/65th Avenue intersection (City/CPU facility), or a water main in 65th Avenue. As the design of the future elementary school is currently at a conceptual level of detail, the route for extending water service to the property has yet to be decided. Further details regarding future water connections to the site will be provided during the site plan review phase of the future elementary school project, which is required before issuance of development permits. Preliminary discussions with CPU indicates the utility has adequate capacity to serve the elementary school. In addition, according to section 8 of the pre-application conference report, the City has water rights to serve an additional 3,689.5 equivalent residential units (ERUs). Therefore,

regardless of which water line is extended to the property, it is anticipated that capacity is sufficient to serve the future elementary school.

C. Signature [\[HELP\]](#)

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.

Signature: _____

Name of signee _____

Position and Agency/Organization _____

Date Submitted: _____

D. Supplemental Sheet for Nonproject Actions

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The property currently contains two commercial zoning designations (CRB and CNB). The proposed amendments would rezone the entirety of the property to PF. Generally, land uses allowed under the current zoning designations have the potential to be more intense than the uses allowed under the proposed PF zone. The table below lists the general uses allowed in the existing and proposed zones, as well as the development standards unique to each respective zone.

	Proposed Zone: PF	Current Zone: CNB	Current Zone: CRB
General Uses Allowed	<ul style="list-style-type: none"> • Office • Community Recreation and Social Facility • Park or Trail • School: Elementary/Middle/High • Funeral Home/Cemetery, etc. • Emergency Services • Public Agency or Utility Yard • Utility Facility • Park and Ride Lot 	<ul style="list-style-type: none"> • Community Residential Facility • General Retail Trade/Services • Eating and Drinking Establishment • Gasoline Service Station • Daycare Facility • Office • Park or Trail • Conference Center • Religious Institution • Medical Clinic/Laboratory • Interim Recycling Facility 	<ul style="list-style-type: none"> • Community Residential Facility • Hotel and Motel • General Retail Trade/Services • Eating and Drinking Establishment • Gasoline Service Station • Funeral Home/Cemetery, etc. • Office • Indoor Entertainment Facility • Park or Trail • College and University • Conference Center • Religious Institution • Hospital • Public Agency or Utility Yard • Interim Recycling Facility • Park and Ride Lot
Maximum Height	35 feet	35 feet	65 feet
Setbacks from Streets	20 feet	0-10 feet	0-20 feet
Side Yard Setback	20 feet	0 feet	5 feet
Rear Yard Setback	20 feet	0 feet	5 feet

Since development is not proposed under the existing CRB or CNB zones, the following analysis generalizes impacts based on the most impactful land use (assuming maximum buildout) that could be developed in the existing zones as compared with the most impactful use that could be developed in the proposed PF zone. In addition to the uses allowed under the current and proposed zones, each zone has unique development standards that regulate the intensity and footprint of new development. The development standards for the proposed PF zone will limit the intensity of future development on the site by restricting building height to 35 feet and by requiring greater setbacks (20 feet), which limits the amount of buildable land and development intensity. In contrast, the current commercial zones allow building heights that range from 35-65 feet (depending on which zone you are in), and have less restrictive setback standards.

Impact	CRB & CNB	PF	Differences
Discharge to Water	<p>Most impactful use: hotel/motel</p> <p>Development/operational aspects with the potential to result in impacts: Large parking lots and high building coverages could result in large quantities of stormwater runoff, but would be detained and treated in accordance with City and state standards.</p>	<p>Most impactful use: office</p> <p>Development/operational aspects with the potential to result in impacts: Large parking lots and high building coverage could result in large quantities of stormwater runoff, but would be detained and treated in accordance with City and state standards.</p>	No significant differences in potential water discharge impacts due to required compliance with stormwater regulations.
Air Emissions	<p>Most impactful use: General retail/office</p> <p>Development/operational aspects with the potential to result in impacts: High traffic generation that may result in high air emissions. Certain uses such as gasoline service stations may have air emissions impacts that would need to be mitigated/minimized through compliance with state standards</p>	<p>Most impactful use: office</p> <p>Development/operational aspects with the potential to result in impacts: High traffic generation that may result in high air emissions. Traffic generation generally confined to AM and PM peak hours.</p>	Generally higher traffic generation and air emissions for uses allowed under the current zoning compared to the proposed. Please see the project's transportation impact letter for projected trip generation for the highest intensity land uses at full buildout under the current and proposed zones (transportation impact letter is on file with the City).
Toxic or hazardous substances	<p>Most impactful use: gasoline service station</p> <p>Development/operational aspects with the potential to result in impacts: Gasoline service stations will require storage and transfer (to and from the site) of hazardous substances (fossil fuels).</p>	<p>Most impactful use: emergency services</p> <p>Development/operational aspects with the potential to result in impacts: Minor quantities of fossil fuels may be stored on the site for use during emergency situations. Quantities are anticipated to be minimal.</p>	Higher likelihood of toxic or hazardous substances for uses in the CRB and CNB zones.
Noise	<p>Most impactful use: interim recycling facility</p> <p>Development/operational aspects with the potential to result in impacts: Interim recycling facilities may be operational during late hours, and are inherently noise intensive because of the nature of the service provided (large vehicles traveling to and from the site, compaction mechanisms, hard</p>	<p>Most impactful use: emergency services</p> <p>Development/operational aspects with the potential to result in impacts: Operation of emergency services facilities could result in periods of loud noises (sirens from emergency services vehicles).</p>	Land uses allowed in CRB and CNB zones would likely have longer hours generating noise over an extended period of time, and more frequent production of loud noises. Emergency services could result in infrequent/short periods

	objects coming into contact with each other, etc.).		of noise, although the intensity of such noises may be higher than noise produced from CNB/CRB land uses.
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As demonstrated in the table above, anticipated impacts resulting from the most intensive land use identified for the existing and proposed zones are typically more severe in the existing zoning designations. As impacts are use-dependent, it should be noted that it is the RSD's intent to develop an elementary school on the property, pending approval of the proposed amendments. Elementary schools are likely to result (depending on their design) in fewer impacts than the most impactful uses identified for the PF zone in the table above. Therefore, it is anticipated that successful comprehensive plan map and zoning district amendments would reduce the likelihood for adverse water discharge, air emissions, hazardous substances, and noise impacts when compared to impacts generated by development allowed in the current CRB and CNB zoning designations.

Proposed measures to avoid or reduce such increases are:

No mitigation measures are proposed as no significant environmental impacts related to water discharges, emissions to air, hazardous materials, or noise are anticipated as part of this non-project action. The eventual development of an elementary school on the property will require a project-level SEPA assessment of impacts to water, air, and noise, and the use of toxic or hazardous materials.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

Uses resulting from the comprehensive plan map and zoning district amendments have the potential to affect plants, animals, and fish or marine life through the establishment of different allowed uses and development standards for the site, which could result in the development of more intense land uses than those allowed under the site's current zoning designations. In this case, the proposed amendments would change the zoning of the property from commercial (CNB and CRB) to PF. As established above, land uses allowed in the PF zone are generally less intensive than what is allowed in the CNB and CRB zones currently regulating the property. Less intensive development decreases the likelihood of development-related plant, animal, fish, or marine life impacts. Land uses developed under the proposed PF zone will also be subject to stricter development standards that would limit the size of building footprints, building height, and overall developable area of the site through greater setback standards and landscaping requirements. The stricter development standards applied to the PF zone would further minimize the likelihood that new development on the site would result in adverse impacts to plant, animal, fish, or marine life.

It is the RSD's intent to construct an elementary school on the subject parcel, pending approval of the proposed amendments. As the property is heavily constrained with habitat that benefits various plants, animals, and fish life, the development of the site will result in impacts to some extent. However, the development of an elementary school is contingent upon a successful comprehensive plan and zoning designation change for the property, and therefore impacts are conceptual in nature. As such, the extent of critical area impacts has yet to be quantified. Any future development on the property will be required to comply with the City's critical areas protection ordinance (Title 18) and potential impacts to plants, animals, or fish life would be evaluated at that time. It should be noted that, due to the extent and location of the habitat areas affecting the site, it is unlikely that any redevelopment under the current or proposed zones would avoid impacts to plant, animals, or fish life.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

Future development on the subject parcel will require compliance with the City's critical areas protection ordinance and all state and federal permitting requirements. During the City's review of

the future elementary school's applications for land use review approval and development permits, any necessary conservation and mitigation measures will be addressed at the time of site plan review.

3. How would the proposal be likely to deplete energy or natural resources?

Approval of the proposed amendments would alter the uses allowed to be developed on the property. Uses allowed in the current commercial zones (retail, gas station, entertainment facilities, conference centers, colleges, hospitals, hotels/motels, etc.) have the potential of higher energy/natural resources demand due to their hours of operation which are longer than for uses in the PF zone (office, schools, funeral homes, etc.), and because of their potential to result in larger-scale development (larger buildings are allowed under the current zoning designations), which typically results in more energy consumption for building operations.

Although this proposal is for comprehensive plan map and zoning district amendments, approval of the project would result in the construction of an elementary school on the property. Of all the uses allowed in the PF zone, public schools are likely the most energy intensive because of their size. Nonetheless, the school would have shorter operational hours (school will be in session from 9 AM to 3:30 PM, and assume it would be operational a few hours before and after ordinary school sessions), than most uses in the CRB and CNB zones and would likely require less energy for operation.

Proposed measures to protect or conserve energy and natural resources are:

Future development of an elementary school on the subject site will require review and approval of land use and development applications and a project-level SEPA review of potential natural resources and energy impacts.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The property subject to the proposed amendments contains City-designated critical areas (wetlands, fish and wildlife habitat conservation areas and their buffers), is classified as prime agricultural soils by the DNR, and is mapped by Clark County as land with a moderate-high or high probability for encountering archaeological artifacts. The following discussion summarizes how each of these types of sensitive areas may be impacted by the proposal:

- *Critical areas: Many of the uses allowed in the current and proposed zones have the potential for large development footprints (retail, hospital, office, schools, hotels/motels, etc.) and would likely have unavoidable impacts to one or both onsite streams and wetlands. The precise nature and degree of impacts for the uses that could be developed in the current and proposed zones cannot be determined until project-specific detail is available. However, due to the extent and location of the onsite critical areas, development allowed under either the current or proposed zones would likely result in some impacts to critical areas.*
- *Prime agricultural land: As the entire property is currently in use as an agriculture operation, any redevelopment of the site (regardless of the use or zone) would result in impacts of some degree to farmland. It should be noted that the soils are considered prime agricultural soils, but are not designated as lands of long-term agricultural significance. Therefore, the potential for farmland impacts are the same under the current and proposed zoning designations.*
- *Archaeological resources: The property has yet to be assessed for archaeological resources; therefore, potential impacts to archaeological resources cannot be determined. However, due to the relatively large building sizes allowed under both the current and proposed zones, approval of the proposed amendments and subsequent development on the property would make no material difference to the impacts to archaeological resources.*

Before development of an elementary school could occur on the property, an archaeological predetermination would likely be required to determine the likelihood of artifacts on the site. Once the predetermination is complete, the potential for archaeological artifact impact will be known and vetted through DAHP and the City. This process would likely be required for uses developed under either the current or proposed zoning.

Proposed measures to protect such resources or to avoid or reduce impacts are:

Development of the school will require the submittal and approval of City land use permits to assess impacts and mitigations to sensitive areas, as well the potential for submittal of state and federal permits.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The property is not located within the vicinity of a regulated shoreline waterbody; therefore, no effect on shoreline uses will occur. The proposal will change the land uses that are allowed on the property, with the intent of constructing an elementary school pending approval of the proposed amendments. The proposed amendments comply with the City of Ridgefield Comprehensive Plan, as demonstrated in the narrative discussing the proposed comprehensive plan map and zoning district amendments that has been submitted with this checklist.

Proposed measures to avoid or reduce shoreline and land use impacts are:

The proposal is consistent with the City's comprehensive plan and therefore no mitigation measures are proposed or required.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

Comprehensive plan map and zoning district amendments have the potential to allow more intensive uses. However, under the current zoning, more intensive land uses would likely result in greater demand for transportation service (increased vehicle trip generation) and utilities (uses such as hotel/motels, conference centers, and hospitals could potentially result in greater utility demand due to the scale of the development and long operating hours). As established above, the proposed amendments would generally result in less intensive land uses, which would reduce the potential for transportation, public services, and utility impacts. An analysis of potential transportation, public services, and utilities impacts is included below.

Transportation

Kittelson & Associates completed a transportation impact letter (on file with the City) that compares the site trip generation potential under the existing and proposed zoning. As documented in the letter and demonstrated below, development under the proposed zoning will result in a reduction in weekday daily trip site generation potential compared to development under the existing zoning.

Trip estimates under the existing and proposed zoning were calculated using trip rates obtained from Trip Generation, 9th Edition. Site trip generation under the respective reasonable "worst-case" development scenarios were compared to determine the net difference in weekday daily trips. A review of the 27.36-acre site reveals that approximately 6.3 acres of the site is constrained with wetlands, riparian areas, and their buffers. Accordingly, it has been assumed for the purposes of the trip generation study that approximately 21 acres of the site are buildable.

The highest potential trip-generating land uses within the existing CNB and CRB zones reveals a range of retail and office related uses. Accounting for the relatively rural location of the site, a reasonable approximation of future development under these uses was developed with the following assumptions. First, it was assumed that 25 percent of the developable 21 acres would be occupied by building area (228,690 square feet) while the remaining 75 percent would consist of on-site circulation, parking, open space, and other required non-building elements. It was further

assumed that one third (75,468 square feet) of the potential building area would develop as shopping center while the remaining two-thirds (153,222 square feet) would develop as office uses.

By comparison, the highest trip-generating land uses within the proposed PF zone reveals a narrower range of allowed uses consisting of office and k-8 schools. Given this wider range of uses, two comparative development scenarios were analyzed. Case 1, a “worst-case” development scenario, assumes 100 percent of the site building area would develop as office-related uses (228,690 square feet). Case 2 assumes a 72,000 square foot/550-student elementary school. The summary below provides the resulting trip generation comparison for each proposed zoning scenario versus development under the existing zoning.

Case 1: “worst-case scenario” under the existing zoning (74,468 square feet of shopping center and 153,222 square feet of general office), would result in 7,346 weekday daily trips. The “worst-case scenario” for development under the proposed zoning would be maximum buildout of general office (228,690 square feet), which would result in 2,522 weekday daily trips. Maximum buildout of general office under the proposed PF zoning is projected to produce 4,824 fewer weekday daily trips than the projected trip generation under the current zoning.

Case 2: “worst-case scenario” under the existing zoning (74,468 square feet of shopping center and 153,222 square feet of general office), would result in 7,346 weekday daily trips. An approximately 72,000-square-foot/550-student elementary school would result in 710 weekday daily trips. Therefore, construction of an elementary school on the site under the proposed zoning is projected to result in 6,636 fewer weekday daily trips.

As demonstrated above, “worst-case scenario” maximum buildout of uses allowed in the proposed PF zone would result in substantially less weekday daily trip generation than the current zones. Moreover, anticipated weekday daily trip generation would be further reduced if an elementary school were to be developed on the site, following approval of the proposed amendments. As the proposed zone would allow uses that are likely to result in significantly less weekday daily trip generation, approval of the proposed amendments has greater potential to decrease transportation system demand than the current zones applied to the site. Please see the transportation impact letter for more details (on file with the City).

Public Services

Approval of the proposed amendments would not result in a change in public service demand, since uses allowed in the current and proposed zones do not inherently increase or decrease public service demand. However, as the PF zone serves as the preferred zone for establishment of public services, approval of the proposed amendments would produce additional land suited for development of public service facilities. This would indirectly reduce public service demand by establishing more PF-zoned land that could accommodate future public service facilities (including the future elementary school planned for the site).

Utilities

As established above, the current zoning designations for the property generally allow more intensive land uses than would be allowed under the proposed PF zone. Greater intensity land uses generally generate higher utility demand based on the scale of the development and hours of operation. However, utility demand is ultimately dependent on the specific use; therefore, utility demand will need to be assessed on a project-specific level.

Proposed measures to reduce or respond to such demand(s) are:

The applicant will complete a detailed transportation impact study and assessment of utility capacity, with identified improvements at the time of site plan review. Service providers, including the Ridgefield Police Department and the Clark County Fire Department Number 11, will be included in the land use application review process and invited to comment. The future elementary school must also meet International Fire Code requirements.

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

These amendments are being proposed consistent with the procedures set forth for a quasi-judicial comprehensive plan map and zoning district amendment in RDC Chapter 18.320. Compliance with all local, state, and federal laws will be required prior to authorization to construct the future school use.