



## DETERMINATION OF NON-SIGNIFICANCE

**Description of Proposal:** **CPZ2020-00001 REACH** – The proposal is to amend the comprehensive plan and zoning from Commercial (NC) to Urban Medium Density Residential (R-22) on two parcels, which are cumulatively 3.11 acres (104530004, 104530040, and 104600000).

**Proponent:** Clark County

**Location of proposal, including street address, if any:** 9703 NE Covington Rd, Vancouver, WA 98662 and the two adjacent vacant lots have no street address.

**Lead Agency:** Clark County, Washington

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. 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 and other information on file with the lead agency. This information is available to the public on request.

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below.

Comments must be submitted by: June 16, 2020

**Responsible Official:** Oliver Orjiako  
**Position/title:** Director  
**Address:** **RE: SEPA Comments**  
Clark County Community Planning  
1300 Franklin Street; 3<sup>rd</sup> Floor  
P.O. Box 9810  
Vancouver, WA 98666-9810

**Date:** 4-1-20      **Signature:** Oliver Orjiako

The staff contact person and telephone number for any questions on this review is Sharon Lumbantobing, Planner II, (360) 397-2280 ext. 4909.



Clark County SEPA Environmental Checklist  
Washington Administrative Code (WAC) 197-11-960

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**A. BACKGROUND**

1. **Name of proposed project, if applicable:** REACH – Covington Commons LP
2. **Name of applicant:**  
*REACH Community Development, Inc.*
3. **Address and phone number of applicant and contact person.**  
*Covington Commons LP – REACH CDI  
Melissa Baker, Portfolio Asset Manager  
4150 SW Moody Avenue  
Portland OR 97239  
(503) 501-5723*
4. **Date checklist prepared:**  
*March 27, 2020*
5. **Agency requesting checklist:**  
*Clark County, Community Planning Department*
6. **Proposed timing or schedule (including phasing, if applicable):**  
*If approved by the Clark County Councilors, the comp plan and zoning designation would become effective in March 2021.*  
  
*If approved, the project is tentatively scheduled for construction in Fall 2021.*
7. **Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.**  
*In the future, a formal site plan application will be submitted for construction of apartments restricted to serve low-income community members on two of the parcels owned by Reach CDI.*
8. **List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.**

*The project on the vacant parcels owned by Reach CDI will be designed and developed in accordance with state and local requirements for stormwater management, erosion control, and any other environmental standards.*

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

*None.*

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

*Comprehensive plan and zone change.*

- 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.**

*This is a proposal by Reach Community Development, Inc., (Reach CDI) to amend the comprehensive plan and zoning designation from Commercial (NC) to Urban Medium Density Residential (R-22) on three parcels, which are cumulatively 3.11 acres (104530004, 104530040 and 104600000). This amendment would enable Reach CDI, the nonprofit sponsor, to develop additional affordable housing units on the vacant parcels to complement to the existing housing that serves low-income households in Clark County. As part of this request, two adjacent property owners are requesting to participate in Reach CDI's request to amend the comprehensive plan and zoning designations on their parcels from NC to R-22 (104530016, 104530041, and 104530002). One of the property owners (104530002) is in discussion with Reach CDI about the purchase of their property so that Reach CDI can include this parcel in their affordable housing development. These three additional parcels total 1.1 acres. The total cumulative acres of this request are 4.21 acres.*

**12. Location of the proposal.**

- o 9703 NE Covington Rd and two adjacent vacant parcels with no street address
- o 9815 NE COVINGTON RD, VANCOUVER, 98662
- o 9807 NE COVINGTON RD, VANCOUVER, 98662

**B. ENVIRONMENTAL ELEMENTS**

**1. Earth**

- a. General description of the site: Flat, rolling, hilly, steep slopes, mountainous, other.**

*Flat*

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

*Very little variation in slope across vacant parcels*

- 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 prime farmland.**

*To be determined – no soil classification available at this time*

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

*No. Liquification hazard documented as very low*

- e. **Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill.**

*To be determined. This will be analyzed as a part of our pre-construction due diligence.*

- f. **Could erosion occur as a result of clearing, construction, or use? If so, generally describe.**

*No. Best practices will be implemented to address risk of erosion during construction period.*

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

*Less than 10% of the vacant parcels will be covered with impervious surfaces after project construction. New housing units will be able to utilize existing parking lots in the community, project scope will include additional walkways and prioritize pervious surfaces where feasible.*

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

*Project sponsor (Reach CDI) and construction team will utilize industry best practices to control erosion throughout the project development process.*

## **2. Air**

- a. **What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known.**

*During future development after additional SEPA review, construction equipment will emit exhaust. Air may get dusty during construction. Erosion control practices will be utilized to minimize impacts.*

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

*No.*

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

*None.*

## **3. Water**

- a. **Surface:**

- 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.

*No.*

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

*N/A*

- 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.

*None.*

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

*No.*

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

*No.*

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

*No. Construction control practices will be implemented to minimize discharges from the site throughout project development.*

**b. Ground Water:**

- 1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known.

*Groundwater will not be withdrawn.*

- 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.

*None.*

**c. Water Runoff (including storm water):**

- 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.**

*Existing affordable housing community has bioswales and green space to slow down the movement of stormwater. New construction will complement the existing systems and work to slow down the movement of stormwater from the site to the community catchment system.*

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

*No.*

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

*No.*

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

*The stormwater systems will be designed to collect, convey, treat, and infiltrate and release stormwater runoff at pre-developed rates from the developed site.*

**4. Plants**

- a. Check or circle types of vegetation found on the site.**

deciduous tree: alder, maple, aspen, other

evergreen tree: fir, cedar, pine, other  
shrubs

grass

pasture

crop or grain

orchards, vineyards or other permanent crops.

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

water plants: water lily, eelgrass, milfoil, other

other types of vegetation

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

*The two vacant parcels are currently grassy. The grass will be removed as a part of the construction project. No additional alteration to the existing vegetation is anticipated.*

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

None.

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

*Yes .The project sponsor (Reach CDI) will work with the team to include native plants and enhanced landscaping techniques to manage stormwater onsite and enhance vegetation for the community on the two vacant parcels when they are developed..*

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

None.

## 5. Animals

- a. **Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:**

birds:            hawk, heron, eagle, songbirds, other:

mammals:        deer, bear, elk, beaver, other:

fish:             bass, salmon, trout, herring, shellfish, other:

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

None.

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

*The site is located within what is commonly referred to as the Pacific Flyway. The Flyway stretches from Alaska to Mexico and from the Pacific Ocean to the Rocky Mountains.*

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

None.

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

None.

## 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.**

*Electric, natural gas and solar energy are included in the proposed project design. These energy sources will be used for space heating, water heating and lighting. Funding sources will determine if solar technology is feasible for this project.*

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

*The project sponsor (Reach CDI) owns three adjacent affordable housing complexes, and the new development on the two vacant parcels will increase the potential capacity to bring solar technology to the Cascadia Village Trio (all three communities redeveloped as one project).*

- 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:**

*REACH CDI integrates resource conservation measures in all new construction and rehabilitation activities – including this new development in Clark County. Typical conservation features include high efficiency appliances and fixtures, robust building envelope design integrated with HVAC systems and renewable resources (where feasible), including solar energy production.*

## **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.**

*No.*

- 1) Describe special emergency services that might be required.**

*N/A*

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

*Construction best practices will be utilized to reduce and control environmental health hazards associated with project development.*

- 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.**

*N/A*

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

*N/A*

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

*Construction best practices will be utilized to reduce and control environmental health hazards associated with project development.*

- b. Noise**

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

*Traffic noise from NE Covington Road (east side of vacant parcels) and community noise from adjacent housing communities.*

- 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.**

*Construction noise during project development (site noise will occur M-F, 7:30am to 6:00pm); post-construction noise levels will mirror the surrounding communities.*

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

*Construction best practices will be utilized to reduce and control noise impact for surrounding residential buildings.*

## **8. Land and Shoreline Use**

- a. What is the current use of the site and adjacent properties?**

*Currently, one of the subject parcels (104530004) Covington Commons has 40 affordable housing apartments, ranging in size from one to four-bedroom units. The other two subject parcels 104530040 & 104600000 are vacant lots associated with Covington Commons LP (owned by REACH Community Development, Inc.). Properties to the west are zoned and developed as Urban Medium Density Residential, properties to the east are zoned and developed as Commercial, and properties to the south are zoned and developed as Urban Low Density Residential, and properties to the north are zoned and developed as Urban Medium and Urban High Density Residential.*

- b. Has the site been used for agriculture? If so, describe.**

*No.*

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

*Covington Commons LP includes eight residential buildings (40 units total) and a play structure on parcel 10453004.*

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

*The play structure will likely be removed and redesigned to serve the broader community (Cascadia Trio)*

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

*Neighborhood Commercial*

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

*Current Comprehensive Plan designation is C*

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

*N/A*

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

*No.*

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

*Currently 140 residents living at Covington Commons. The zone modification will enable REACH Community Development, Inc. to use the two vacant parcels to develop an additional 15-20 affordable housing units, projected to serve an additional 50-70 residents. Once the proposed new construction/redevelopment project is complete, The Cascadia Trio will be made up of 135 affordable housing units, providing safe and reliable housing units for 400+ community members.*

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

*None.*

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

*No displacement impact projected*

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

*Reach CDI, the Sponsor nonprofit, is working closely with the Clark County Community Planning department to ensure that their proposal is compatible with existing and projected land uses and plans.*

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

*No agricultural or forest land impact projected*

**9. Housing**

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

*15-20 additional low-income housing units will be developed as a part of this project on the two vacant parcels owned by Reach CDI.*

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

*None.*

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

*No negative housing impacts projected*

## 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?**

*Proposed structure(s) will complement existing buildings (2-3 stories tall with pitched rooftops) – principal exterior building material will be vinyl siding, to match surrounding buildings.*

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

*The view of NE Covington Road from the Cascadia Village office building will be obstructed.*

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

*Sponsor will work closely with the project design team to control aesthetic impacts.*

## 11. Light and Glare

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

*Light glare will be produced from glazing, and the project team will work to control negative impacts associated with light reflected from windows.*

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

*No safety hazard or view interference is anticipated.*

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

*None.*

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

*Sponsor will work with the project design team to reduce and control light and glare impacts.*

## 12. Recreation

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

*The REACH-owned properties (Covington Commons, Cascadia Village and The Mews at Cascadia Village) have interior and exterior common area facilities that are utilized by residents for recreation, including access to the community room (with free wifi capabilities), play structures, community garden plots and grass fields.*

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

*The proposed project would displace the grass fields, but the final project on the parcels owned by Reach CDI will include enhanced recreational areas (e.g. play structures) for the community.*

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

*REACH CDI will work with their project design team to integrate recreation opportunities into the redevelopment project.*

### **13. Historic and Cultural Preservation**

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe.**

*No*

- b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.**

*None*

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

*N/A*

- 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.**

*Sponsor will work with the project team to minimize disturbance to resources – no such disturbance is anticipated.*

### **14. Transportation**

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

*NE Covington Road is classified as a Minor Arterial 4 lanes with CLT & bike lanes. NE 72rd Street classified as an Urban Local Access road.*

- b. Is the site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?**

*The site is in a C-TRAN benefit area.*

- c. How many parking spaces would the completed project have? How many would the project eliminate?**

*No parking spaces are proposed at this time. Future site plans will provide required parking spaces. No parking spaces will be eliminated.*

- d. Will the proposals require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private).

*The proposed project will take access from the existing NE 73rd street. Internal roadways and parking will be constructed on-site to serve the proposed apartments.*

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

*No.*

- f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur.

*NE Covington Rd classified as a Minor Arterial 4 lanes with CLT & bike lanes. NE 73rd St. classified as an Urban Local Access road.*

*Assuming 30% of the total site is building coverage area, (typical-the rest of the area is assumed to be landscaping, stormwater, parking and other associated amenities); therefore, the building square footage is approximately 8,625 square feet.*

*Existing zone highest use: Retail sales less than 25,000 square feet.*

*Future zone highest use: Family day care center*

**Buildout scenario comparisons:**

**Existing trips:** To estimate trip generation rates from the Trip Generation Manual, Institute of Transportation Engineers (ITE), the land use category 820, Shopping Center > 25,000 sq. ft. generates 3.81 trips per 1,000 sq. ft. PM peak hour of adjacent trips.  $8.625 \times 3.81 = 33$  trips.

**Potential Buildout trips:** Day care center ITE code 865, 11.12 trips per 1,000 sq. ft. PM peak hour of adjacent trips.

$8.625 \times 11.12 = 96$  trips.

**Proposed Actual Buildout:** MF 7.32 trips per unit, 0.56 trips per unit, PM peak hour adjacent trips.

$20$  units  $\times$   $0.56 = 11$  trips.

*The proposed change results in lower trips rates in comparison to existing zoning.*

- g. **Proposed measures to reduce or control transportation impacts, if any:**  
*None proposed as part of this non-project action.*
- h. **Proposed measures to reduce or control transportation impacts, if any:**  
*None necessary.*

**15. Public Services**

- a. **Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? if so, generally describe.**  
*When the site develops, the apartments will require all public services and they are all available to serve the site.*
- b. **Proposed measures to reduce or control direct impacts on public services, if any.**  
*None proposed as part of this non-project action. Future development of the site will pay school, park and transportation impact fees, as necessary.*

**16. Utilities**

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

**C. SIGNATURE**

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: Sharon Lumbantobing

Name of signee: Sharon Lumbantobing

Position and Agency/Organization: Clark County Community Planning on behalf of Reach Community Development, Inc

Date Submitted: March 30, 2020

#### **D. SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS**

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?**

*No increased discharge. No development is proposed as a part of this comprehensive plan and zone change.*

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

*No impact on plants, animals, fish or marine life. No development is proposed as a part of this comprehensive plan and zone change.*

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

*No impact on energy or natural resources. No development is proposed as a part of this comprehensive plan and zone change.*

- 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?**

*No impact on environmentally sensitive areas. No development is proposed as a part of this comprehensive plan and zone change.*

- 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?**

*No development is proposed as a part of this comprehensive plan and zone change.*

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

*No increase on demands for transportation or public services and utilities. No development is proposed as a part of this comprehensive plan and zone change.*

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

*The proposal would not conflict with local, state or federal laws.*