



## DETERMINATION OF NON-SIGNIFICANCE

**Date of Issuance: November 28, 2022**

**Lead Agency: Clark County, WA**

Agency Contact

**Responsible Official:** Oliver Orjiako

**Position/title:** Community Planning Director

**Address:** **RE: SEPA Comments**  
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**Agency File Number: OLR-2022-00014**

### **Description of Proposal:**

Amend the Comprehensive and Zoning maps to add a surface mining overlay on a parcel that is split zoned R-10 and FR-40 (254798000) totaling 76 acres. The overlay would apply to the portion of the property with a current zoning designation of FR-40 and comprehensive plan designation of Forest Tier – 2 which is approximately 46 acres.

**Proponent:** Cardai Hill Rock Quarry, LLC

### **Location of proposal, including street address, if any:**

Township 5N, Range R1E, SW ¼ Section of Sec.17

### **Name, phone, email of applicant/proponent:**

Nancy Rogers, Cairncross & Hempelmann, (206) 254-4417, [NRogers@Cairncross.com](mailto:NRogers@Cairncross.com)

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). We have reviewed the attached Environmental Checklist and other information on file with the lead agency. This information is available to the public on request.

This determination is based on the following findings and conclusions:

This is a non-project action that would add a surface mining overlay to the site area and subsequent development would require a determination of any adverse environmental impacts and a conditional use permit.

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: December 13, 2022

**Date:** 11/16/2022      **Signature:** *Oliver Orjiako*

The staff contact person and telephone number for any questions on this review is Bart Catching, Planner II at 564.397.4909.

For other formats, contact the Clark County ADA Office at [ADA@clark.wa.gov](mailto:ADA@clark.wa.gov).

**Appeal process:** All appeals shall be in writing, filed with the responsible official and accompanied by an appellate fee, pursuant to CCC 40.570.080.D SEPA and County Decisions.



CLARK COUNTY  
WASHINGTON

COMMUNITY DEVELOPMENT  
LAND USE REVIEW

# SEPA Environmental Checklist

WAC 197-11-960

Rev 12.3.18

*Working together. Securing your safety. Protecting your investment.*

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## **Purpose of checklist:**

The State Environmental Policy Act (SEPA), Revised Code of Washington (RCW), Chapter 43.21C, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and agencies identify impacts from your proposal and to help agencies decide whether or not an EIS is required.

## **Instructions for applicants:**

This environmental checklist asks you to describe basic information about your proposal. Governmental agencies use this checklist to determine whether or not the environmental impacts of your proposal are significant. Please answer the questions briefly, giving the most precise information or best description known. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you do not know the answer, or if a question does not apply to your proposal, write “do not know” or “does not apply.”

Some questions pertain to governmental regulations such as zoning, shoreline, and landmark designations. If you have problems answering these questions, please contact the Clark County Permit Center for assistance.

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. You may be asked to explain your answers or provide additional information related to significant adverse impacts.

## **Use of checklist for non-project proposals:**

Complete this checklist for non-project proposals (e.g., county plans and codes), even if the answer is “does not apply.” In addition, complete the supplemental sheet for non-project actions (Part D).

For non-project actions, the references in the checklist to the words “project,” “applicant,” and “property or site” should be read as “proposal,” “proposer,” and “affected geographic area,” respectively.

**A. Background** [\[HELP\]](#)

1. Name of proposed project, if applicable:

*Cardai Hill Rock Quarry—Surface Mining Overlay*

2. Name of applicant:

*Cardai Hill Rock Quarry, LLC*

3. Address and phone number of applicant and contact person:

**Applicant:**

*Cardai Hill Rock Quarry, LLC*

*C/O: its manager: Integral Northwest*

*Attn: Kamil Lakhani*

*1610 SE Everett Mall Way*

*Everett, WA 98208*

*(425) 438-1811 ext. 100*

**Applicant Representative and Contact Person:**

*Nancy Rogers, Cairncross & Hempelmann*

*524 Second Avenue, Suite 500*

*Seattle, WA 98104*

*(206) 254-4417*

4. Date checklist prepared:

*January 20, 2022*

5. Agency requesting checklist:

*Clark County, Washington*

6. Proposed timing or schedule (including phasing, if applicable):

*The project is a proposal for a zoning overlay to parcel 254798000 (the site). This proposal would affect only the portion of the site that is currently zoned Forest-40. This does not constitute a project action, as no development is proposed. Clark County will consider the overlay application during the 2022–2023 annual*

review cycle. No other project components or phases are currently proposed in relation to the activities described in this checklist.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

*The proposed Surface Mining Overlay (SMO) to site is a singular action that demonstrates independent utility. However, if the SMO were to be approved for the site, Cardai Hill Rock Quarry, LLC (the applicant) could seek additional authorization in the future to establish and operate a rock quarry or redesignate the western portion of the site.*

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

*The following prepared information directly supports the proposed SMO application:*

- *Cardai Hill Quarry Transportation Impact Analysis, Kimley-Horn, January 2022*
- *Report on the Soils, Geology & Geologic Hazards of the Proposed Cardai Hill Quarry, SubTerra, Inc, November 1999.*
- *Hydrology of the Proposed Cardai Hill Rock Quarry, SubTerra, Inc, November 1999.*

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.

*There are no applications pending government approval for the site.*

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

*The following Clark County approvals are required:*

- *State Environmental Policy Act Review*
- *Annual review*

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.)

*The applicant is seeking to construct and operate an aggregate mine near Woodland, Washington. Clark County was the second-fastest-growing county in the state in 2020 (OFM, 2021). This growth means new roads, public utilities, housing, hospitals, schools, and commercial development. To support all this development as well as the maintenance of existing infrastructure, quality aggregate is required. However, local rock quarries and pits are being depleted rapidly; a 2018 study estimated that only a 38-million-cubic-yard supply was available. If new mines are not developed, then aggregate prices will continue to increase and potentially hinder development and growth in Clark County.*

To address this aggregate shortage, the applicant is seeking to designate the site for an SMO to facilitate future extraction of this resource. The site (portion of the property zoned Forest-40) contains a hard rock deposit of long-term commercial significance with an estimated supply of 3.5 to 4.9 million cubic yards of high-quality aggregate. This represents approximately 45 percent of the total rock deposit expected on the entirety of parcel 254798000. The future development of this mine would provide a major boost in the supply in Clark County and help stabilize prices. At this time, the applicant is seeking approval of an SMO only on the portion of the site currently zoned Forest-40. Future development at the site would be reviewed under a separate development application and environmental review once project-level design is available.

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.

The site is directly east of Woodland, Washington, outside the City's urban growth boundary; there is no site address available for this land. The site consists of one 76-acre parcel (254798000), approximately 46 acres of which are subject to this application, and lies in the following section-township-ranges:

- SW 1/4, S17, T5N, R1E
- SE 1/4, S18, T5N, R1E

Please see Figure 1—Vicinity Map, for more information.

## B. Environmental Elements [\[HELP\]](#)

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

a. General description of the site:

The site is dominated by steep slopes and exposed rock faces, making it ideal for aggregate mining, given the abundance of material and lack of overburden in certain areas.

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

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

According to Clark County MapsOnline, the steepest slopes on the site range from 40 to 80 percent. However, site reconnaissance has determined that almost-vertical slopes comprising exposed, minable rock are present on the site.

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.

According to the soil report prepared by SubTerra, Inc, the Soil Classification Service of the United States Department of Agriculture classifies the regional soil group in this area as the Hesson-Olequa association, which consists of deep, nearly level to steep, moderately fine-textured to medium-textured soils common to uplands and terraces. Specific soil types encountered on the site include the following:

- Olequa Silt Loam (OeD, OeE, and OeF).
- Olequa Silty Clay Loam Heavy Variant, 3 to 20 percent slopes (OhD).
- Olympic Clay Loam, 30 to 60 percent slopes (OiF).
- Hesson Clay Loam, 0 to 8 percent slopes (HcB).
- Washougal Stony Loam, 30 to 60 percent slopes (WhF).
- Puyallup Fine Sandy Loam, 0 to 3 percent slopes (PuA).

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

*Yes, the site is characterized by steep slopes with areas of exposed rock faces. These attributes help make the site ideal for hard rock deposit extraction; however, they are also characteristics common to the designation criteria for geologically hazardous areas. According to Clark County MapsOnline, the site potentially contains the following geologically hazardous areas:*

- Severe erosion hazard areas
- Steep slope and landslide hazard areas (slopes exceeding 15 percent and slopes of potential instability)
- Ground shaking amplification area (NEHRP Site Class D)
- Liquefaction susceptibility (moderate to high risk)

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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no impact-control measures are required or proposed.*

## 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no impact-control measures are required or proposed.*

### **3. Water** [\[help\]](#)

- 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.

*Clark County MapsOnline designates riparian habitat along the northern boundary of the site; this habitat is associated with the Lewis River, which flows approximately 900 feet north of the site. There is also one linear riparian habitat designation on the site that is affiliated with either an active or historical stream channel. The Washington State Department of Natural Resources classifies this stream as non-fish-bearing.*

*Based on Washington State Department of Natural Resources mapping, the western portion of the site (not subject to the SMO application or this environmental review) contains a stream of undefined type, as well as a stream along the western boundary that is primarily non-fish-bearing until it transitions to fish-bearing near the intersection of NW Cardai Hill Road and the private driveway that provides access to the site.*

*The National Wetlands Inventory documents a 7.46-acre freshwater emergent wetland north of the property. While this resource is not located on the site, the wetland's buffer may extend onto the portion of the site not subject to the SMO application.*

- 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

- 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*



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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*According to Clark County MapsOnline, a small segment of land along the northern edge of the site is designated as 500-year floodplain and floodway fringe; these designations are associated with the Lewis River, which flows approximately 900 feet north of the site.*

- 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

b. Ground Water: [\[help\]](#)

- 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

- 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

a. Check the types of vegetation found on the site:

- deciduous tree: **alder, maple**, aspen, other
- evergreen tree: **fir, cedar**, pine, **other: hemlock**
- 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?

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*There are no known threatened or endangered plant species on the site.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*The site contains Himalayan blackberry (Rubus armeniacus), which is a Class C noxious weed. No other noxious or invasive plant species are known to occur on the site.*

#### 5. **Animals** [\[help\]](#)

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:

- birds: **hawk**, heron, **eagle**, **songbirds**, other:
- mammals: **deer**, bear, elk, beaver, other:
- fish: bass, salmon, trout, herring, shellfish, other \_\_\_\_\_

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

According to the Washington Department of Fish and Wildlife Priority Habitat and Species, and U.S. Fish and Wildlife Information for Planning and Consultation mapping tools, there are no records of threatened or endangered species on the site. However, the Lewis River is a known migration route for various threatened and endangered aquatic species. The river flows approximately 900 feet north of the site.

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

*The site is in the Pacific Flyway—a flight corridor for migrating waterfowl, migratory songbirds, and other birds. The Pacific Flyway extends from Alaska through Mexico and into South America.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*There are no documented invasive animal species on the site.*

## **6. Energy and Natural Resources** [\[help\]](#)

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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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:

*This checklist is for a non-project action. No development is proposed as part of this application.*

## **7. Environmental Health** [\[help\]](#)

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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*Except for an access road and limited utilities, the site is undeveloped. Neither past nor present land uses indicate the potential for contamination.*

- 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.

*According to the U.S. Department of Transportation National Pipeline Mapping System, there is a gas transmission line within an easement on the property directly west of the site. However, given that this a non-project action, this condition would not affect the proposed application.*

- 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted.*

#### b. Noise

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

- 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted.*

### 8. Land and Shoreline Use [\[help\]](#)

- 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.

*The site is currently vacant; however, a private driveway extends through the property and provides access to residences to the east. Other surrounding land uses include residences to the north and west, and a commercial tree farm to the south. The land southeast of the property is designated with a SMO; however, there are no active applications for its development as a mineral resource extraction operation.*

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?

*The property has not been used as working farmland or forestland.*

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:

*This checklist is for a non-project action. No development is proposed as part of this application.*

c. Describe any structures on the site.

*Except for a private road and limited utilities, the site is unimproved.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*The portion of the site subject to this application is zoned Forest-40.*

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

*Per the Clark County Comprehensive Plan Land Use Map, the portion of the site subject to this application is designated Forest Tier-II.*

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

*The shoreline designations extending from the Lewis River encompass 200 feet from the ordinary high water, as well as intersecting floodplains. Therefore, a small segment of land in the northern portion of the site where the SMO is proposed, is within shoreline jurisdiction (Rural Conservancy Residential designation).*

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

*The following critical areas are documented by Clark County MapsOnline as being present or potentially present at the site. Please note that the presence, type, quality, and extent of potential critical areas will be confirmed by qualified professionals prior to the submittal of future development applications.*

### **Floodplain**

*A small segment of land along the northern edge of the site is designated as 500-year floodplain and floodway fringe; these designations are associated with the Lewis River, which flows approximately 900 feet north of the site. A short segment of the existing private road serving the site lies in these designated areas.*

### **Riparian Habitat**

Riparian habitat is designated along the northern boundary of the site. This designation follows the same boundaries as the 500-year floodplain and floodway fringe noted above. There is also one linear riparian habitat designation on the site; this is affiliated with either an active or historical stream channel. The Washington State Department of Natural Resources classifies this stream as non-fish-bearing.

### **Geologically Hazardous Areas**

The site is characterized by steep slopes with areas of exposed rock faces. These attributes help make the site ideal for hard rock deposit extraction; however, they are also characteristics common to the designation criteria for geologically hazardous areas. According to Clark County MapsOnline, the site potentially contains the following geologically hazardous areas:

- Severe erosion hazard areas
- Steep slope and landslide hazard areas (slopes exceeding 15 percent and slopes of potential instability)
- Ground shaking amplification area (NEHRP Site Class D)
- Liquefaction susceptibility (moderate to high risk)

While these designations are documented on the site, they do not comprise the entire site, and an evaluation of these conditions would be conducted by a qualified professional prior to submittal of future development applications.

### **Wetlands**

The site does not contain hydric soils or documented wetlands. However, there is a wetland north of the site.

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*The SMO has been proposed on a portion of the site that is zoned Forest-40. SMOs are compatible with Forest-40-zoned land. This was confirmed by Clark County staff and is consistent with the SMO designation criteria codified in the Clark County Unified Development Code and the forest resource land policies in the Clark County Comprehensive Growth Management Plan. There are no current plans to change the projected land use or land use designation on the site to one that would be inconsistent with this SMO application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no conflicts with forest or agricultural land would occur.*

## **9. Housing** [\[help\]](#)

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no housing would be constructed.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no housing would be constructed.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted.*

## **10. Aesthetics** [\[help\]](#)

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted.*

## **11. Light and Glare** [\[help\]](#)

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted.*

## **12. Recreation** [\[help\]](#)

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

*Formal recreation opportunities in the immediate vicinity of the site include:*

- *Community parks in the City of Woodland (approximately 0.75 miles to the west [Goerig Park])*
- *Bratton Canyon Campground (approximately 1.25 miles to the southeast)*

*Informal recreation opportunities in the immediate vicinity of the site include:*

- *Biking, walking, and running opportunities provide by sidewalks and other pedestrian/bicycle infrastructure*
- *Aquatic activities on the Lewis River*

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

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted.*

## **13. Historic and cultural preservation** [\[help\]](#)

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? If so, specifically describe.

*According to the Washington Department of Archaeology and Historic Preservation WISAARD mapping tool, no buildings, structures, or sites on or near the site are over 45 years old and listed or considered as potentially eligible for listing in preservation registers.*

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.

*There are no landmarks, features, or other evidence of Native American or historic use or occupation of the site. This is based on desktop review of various resources, including the Washington Department of Archaeology and Historic Preservation WISAARD mapping tool and historical aerial photos (to determine past use of the site).*



- 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.

*Designation of an SMO on the site would not constitute a project action that could jeopardize cultural or historic resources. Therefore, no site-specific studies besides desktop review of online resources have been conducted.*

- 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.

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted at this time. Future development actions at the site would be required to comply with Clark County provisions regarding the protection of archaeological and historic resources. Compliance with these regulations will be demonstrated to Clark County when future permit applications are submitted for review.*

#### **14. Transportation** [\[help\]](#)

- 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.

*The site is served by a private road (NW 402nd Street). This road connects to NW Cardai Hill Road (local road), which routes traffic onto NW Hayes Road (rural major collector). Traffic from NW Hayes Road travels predominately to the City of Woodland and the Interstate-5 onramp. This is a non-project action; this application does not require consideration of access to a street system.*

- 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?

*The site is not served by public transportation. C-Tran is the public transportation operator in the region. No stops are provided in the vicinity of the site.*

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?

*This checklist is for a non-project action. No development is proposed as part of this application.*

- 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).

*This checklist is for a non-project action. No development is proposed as part of this application.*

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

*No commercial water, rail, or air transportation is provided in the immediate vicinity of the site.*

- 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?

*This checklist is for a non-project action. No development is proposed as part of this application.*

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.

*This checklist is for a non-project action. No development is proposed as part of this application*

h. Proposed measures to reduce or control transportation impacts, if any:

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted.*

**15. Public Services** [\[help\]](#)

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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

b. Proposed measures to reduce or control direct impacts on public services, if any.

*This checklist is for a non-project action. No development is proposed as part of this application; therefore, no mitigation measures are warranted.*

**16. Utilities** [\[help\]](#)

a. Circle utilities currently available at the site:

electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,  
other \_\_\_\_\_

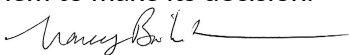
*An electrical line follows the private driveway corridor and provides electricity to the residences to the east. No other utilities are currently available at the site.*

c. 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.

*This checklist is for a non-project action. No development is proposed as part of this application.*

**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 ..... Nancy Bainbridge Rogers

Position and Agency/Organization ..... Cairncross & Hempelmann, Counsel to Cardai Hill Rock Quarry, LLC

Date Submitted: ..... January 25, 2022

#### D. Supplemental sheet for nonproject actions [\[HELP\]](#)

(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.

*Approval of the proposed SMO would allow surface mining of a hard rock deposit on the site. The responses provided below address the potential and theoretical impacts and changes to the site or surrounding conditions as a result of SMO approval. Specific impacts or changes resulting from approval of the SMO would ultimately be based on the design of the operation proposed by a property owner or applicant. These impacts or changes would have to fall within the limits established by Clark County standards, given that Clark County has the decision to approve or deny future conditional use permit applications for surface mines.*

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?

*SMO approval would allow a property owner to develop a surface mine on the approximately 46-acre portion of the site. The following impacts could result from development of a land use allowed under the SMO:*

##### **Water**

*Discharge of earthen material to surface waters (via erosion) could increase, given that mining work likely would be conducted in proximity to a non-fish-bearing stream. Clearing of existing vegetation and removal of overburden could expose previously stable soils; this could promote movement of material via surface water pathways, especially during wet events. However, the only surface water body at the site that could be affected is a Type Ns (non-fish-bearing) stream that may not be active. A site-specific assessment by a qualified professional (biologist) would be required to determine if the stream is an active or historical channel. Furthermore, implementation of or adherence to the impact minimization and avoidance measures documented below would ensure that impacts to surface water bodies would be minimal and within a tolerance acceptable to agencies reviewing a project-specific development proposal.*

##### **Air**

*Additional emissions to air would occur if a surface mine were to be established. The site is currently vacant; any new use established at the site would result in increased emissions. Specific to mining activities, mobile and stationary equipment likely would be used for operation, thus generating emissions from the combustion of gasoline and diesel fuels (such as oxides of nitrogen, carbon monoxide, particulate matter and smoke, uncombusted hydrocarbons, hydrogen sulfide, carbon dioxide, and water vapor). Emissions*

during operation could also include dust from mining activities as well as exhaust (carbon monoxide, sulfur, and particulates) from equipment and vehicles.

### **Toxic or Hazardous Substances**

Development allowed under the SMO would not increase the likelihood of production or release of toxic or hazardous substances; however, it is possible that limited amounts of fuel could be stored on the property to assist in mining activities. Storage of fuel would be scaled specifically for use of mining equipment and would not constitute commercial storage or sale. The specific details regarding potential fuel storage on site would have to be developed on a project-specific basis and included in an application to Clark County for review and approval before the activity begins.

### **Noise**

Approval of the SMO would allow for the construction and operation of a surface mine. This activity would increase noise production during approved hours of mining operation. Noise sources could consist of but would not be limited to blasting, use of equipment on site to move material, rock crushing, loading trucks with material, and trucks traveling to and from the site. While any new use would generate more noise than the existing conditions, given that the site is vacant, the noise generated by mining would be of scale and intensity similar to that of a logging operation, aggregate extraction and processing for road maintenance use, or a sawmill. These are all activities permitted outright or conditionally in the Forest-40 zone without the need to modify the site with an SMO (Clark County Code 40.210.010-1).

The impacts documented above are consistent with the impacts that could be produced by the range of uses currently allowed by the base Forest-40 zone.

Proposed measures to avoid or reduce such increases are:

An applicant or Clark County could consider implementation of the following measures to ensure the protection of the resources identified above:

#### **Water**

- *Require a qualified professional to evaluate the site, specifically in areas subject to mining, for surface water resources. Require an applicant to adhere to recommendations outlined in a critical areas report to protect identified resources.*
- *Ensure that an adequate buffer is maintained around surface water resources to protect the function and value of the surface water from impairment by site activities.*
- *Require the implementation and maintenance of erosion-control measures when work is conducted in the vicinity of a surface water body.*
- *Require mitigation for unavoidable impacts to surface waters.*

#### **Air**

- *During construction and operation, impacts to air quality could be reduced and controlled through implementation of standard federal, state, and local emission-control criteria. These could include*

*requiring the mine operator to use the best available control technologies, conduct proper vehicle maintenance, and minimize vehicle and equipment idling.*

- *The mine operator should be required to implement dust-control measures during earth-disturbing activities, including but not limited to application of water to exposed soil surfaces and covering of soil stockpiles to minimize fugitive dust.*

#### *Toxic or Hazardous Substances*

- *Limit the amount of fuel available for storage on site to the minimum necessary for ongoing mining operations.*
- *Ensure that fuel storage areas are secured in a manner that prevents spills.*
- *Require a spill prevention, control, and countermeasure plan as a means to minimize potential impacts caused by inadvertent fuel spills.*

#### *Noise*

- *Limit the permissible days and hours of operations to ensure that mine activities conform with Clark County's noise ordinance.*

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

*Modifying the zoning of the site to include an SMO would not result in a substantial increase in the intensity of land uses that could be developed when compared to existing conditions. As stated previously, uses such as logging operations, aggregate extraction and processing for road maintenance, and sawmills are permitted outright or conditionally in the base Forest-40 zone. The establishment of any of these uses would result in effects to plants, animals, or fish similar to those from the uses allowed under the proposed SMO. While establishment of a surface mine under the SMO could result in removal of trees and vegetation and the temporary displacement of animals that use these environs for habitat, no effects to fish are anticipated, given the lack of suitable habitat on the site. Plant and animal impacts would be considered minor. Animals would be displaced as mining operations began but would otherwise not be directly affected beyond exposure to the increased noise generated by operations. Plants are renewable resources that would be reestablished upon phasing and reclamation of the mine. In both cases, the anticipated impacts are consistent between uses allowed under the SMO and the current base Forest-40 zone.*

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

*An applicant or Clark County could consider implementation of the following measures to ensure the protection of the resources identified above:*

- *Require a mine reclamation plan that reestablishes plant species.*
- *Ensure that an adequate buffer is maintained around identified surface water bodies.*
- *Ensure that operation of the mine is in compliance with the Clark County noise ordinance.*

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

*Land uses allowed under the SMO would not substantially increase energy or natural resource depletion compared to uses allowed under existing land use regulations. The base zone of the site subject to this application is Forest-40. Per Clark County Unified Development Code 40.210.010(A)(2), "The purpose of the Forest 40 district is to encourage the conservation of lands which have the physical characteristics that are capable of management for the long-term production of commercially significant forest products and other natural resources, such as minerals." Modifying the base Forest-40 zone to include an SMO would not change the potential for natural resource extraction, given that natural resource extraction is already allowed and encouraged. Uses allowed under the SMO and Forest-40 zone could result in similar rates of energy use (based on intensity of the specific uses proposed) and do not represent a unique impact to energy resources.*

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

*An applicant or Clark County could consider implementation of the following measures to ensure the protection of the resources identified above:*

- *Require a mine reclamation plan that reestablishes plant communities. Reclamation should occur after completion of each phase of mining operations.*

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 scale and intensity of uses allowed under the current Forest-40 zone and those allowed under the prospective SMO would result in substantially similar effects to environmentally sensitive areas; however, specific effects would have to be evaluated on a project basis. As stated earlier in this checklist, the site is mapped with one linear riparian habitat designation that may or may not be an active stream channel, geologically hazardous areas, and a small segment of regulated floodplain (isolated along the northern edge of the site). Any natural resource extraction use (allowed either under Forest-40 or the SMO) or other large-scale land use would impact these resources or take place in a resource's proximity. In either case, protection or mitigation of impacts to these resources would come from compliance with Clark County's environmental regulations. The site does not occur in the immediate vicinity of parks, wilderness areas, wild and scenic rivers, threatened and endangered species habitat, known historic or cultural sites, or prime farmlands. While a small segment of land along the site's northern boundary is in the floodway fringe, and there is a documented wetland in proximity to the site, these resources are located in areas where it is feasible to avoid direct impact.*

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

*An applicant or Clark County could consider implementation of the following measures to ensure the protection of the resources identified above:*

- *Development proposed in proximity to Clark County regulated critical areas shall demonstrate compliance with all pertinent environmental regulations and receive approval from Clark County prior to altering the site.*

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?

*Modifying the base Forest-40 zone with an SMO would not substantially change allowable land uses on the site. Land uses allowed under Forest-40 and the SMO are similar in impact, scale, and type. No new land use incompatibility effects would occur as a result of modifying the base zone with an overlay. Development in designated shorelines would require compliance with Clark County's Shoreline Master Program; allowable land uses and specific development regulations are dictated by the Shoreline Master Program rather than by general zoning regulations.*

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

*An applicant or Clark County could consider implementation of the following measures to ensure the protection of the resources identified above:*

- *Require an applicant to demonstrate compliance with pertinent local and state policies when requesting an amendment to a comprehensive plan or zoning map.*

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

*Demand on transportation systems would remain similar under the range of uses allowed under the Forest-40 zone and the SMO. Commercial-scale logging, mining, or wood-processing uses would all have similar intensities regarding truck and vehicle traffic generated by a specific use. However, surface mining at the site (as allowed under the SMO) likely would have a longer-term effect on local transportation systems. This could result in an increased demand on transportation systems over the long term.*

*The uses allowed under the SMO would not significantly increase the demand for public services or utilities. Unique uses allowed under the SMO are limited operation of surface mines. This use does not require unique demands on public services or utilities.*

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

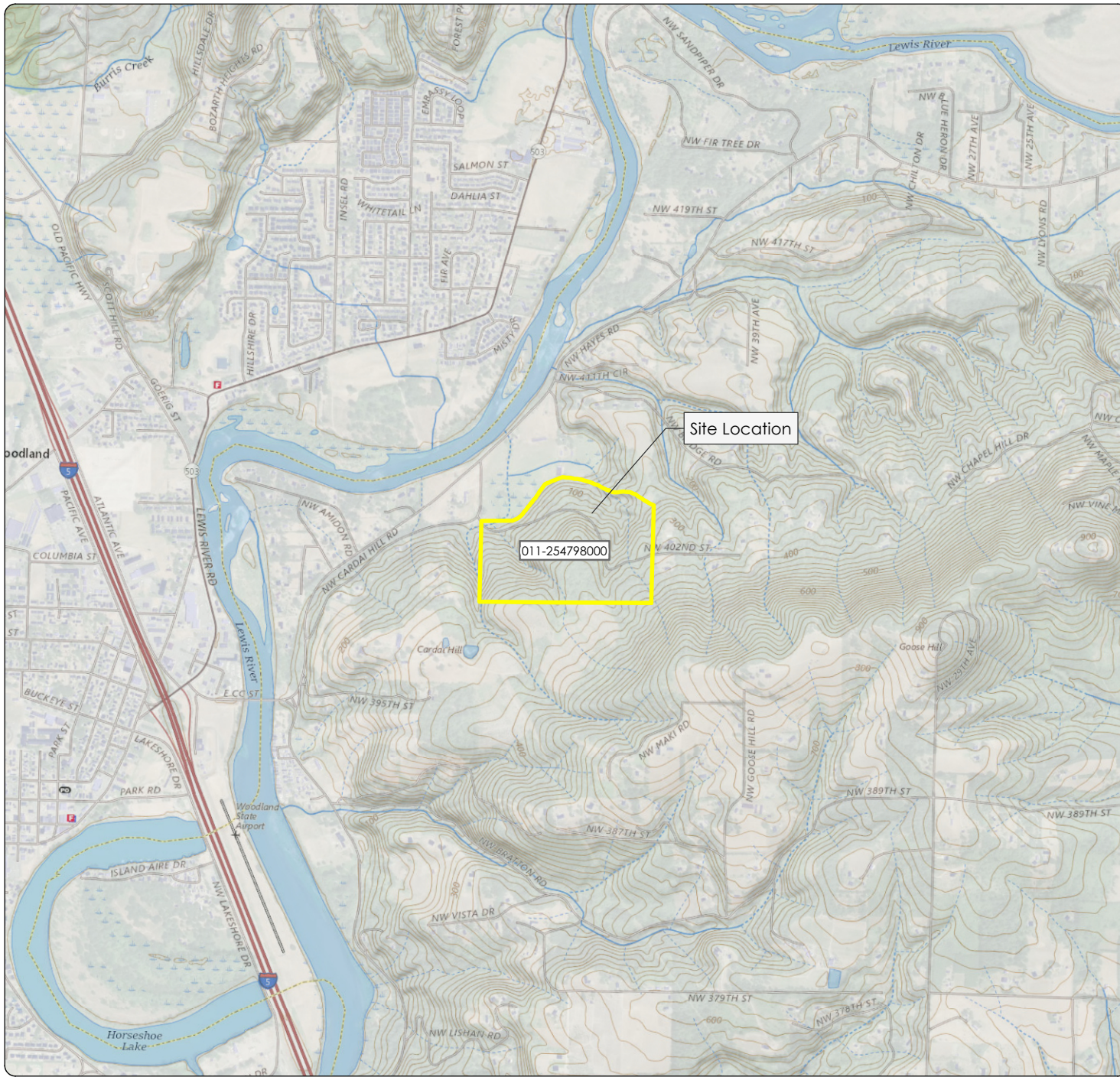
*Clark County could consider implementation of the following measures to ensure the protection of the resources identified above:*

- *Require an applicant to prepare and submit a transportation study showing how levels of service on affected transportation systems could change based on full buildout of uses allowed under the SMO.*
- *Using the findings established in the transportation study referenced above, determine if mitigation is required for transportation impacts.*


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

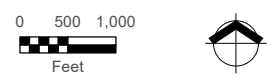
*The proposal for placement of an SMO on the site does not conflict with local, state, or federal law. As demonstrated by the applicant in the required annual review documentation, an SMO on Forest-40-zoned land meets the intended goals of the Washington State Growth Management Act to preserve long-term, commercially significant natural resources and associated industries throughout Clark County.*





**Figure 1  
Vicinity Map**  
Cardai Hill Rock Quarry  
Surface Mining  
Overlay Application

**Legend**  
 Property Boundary

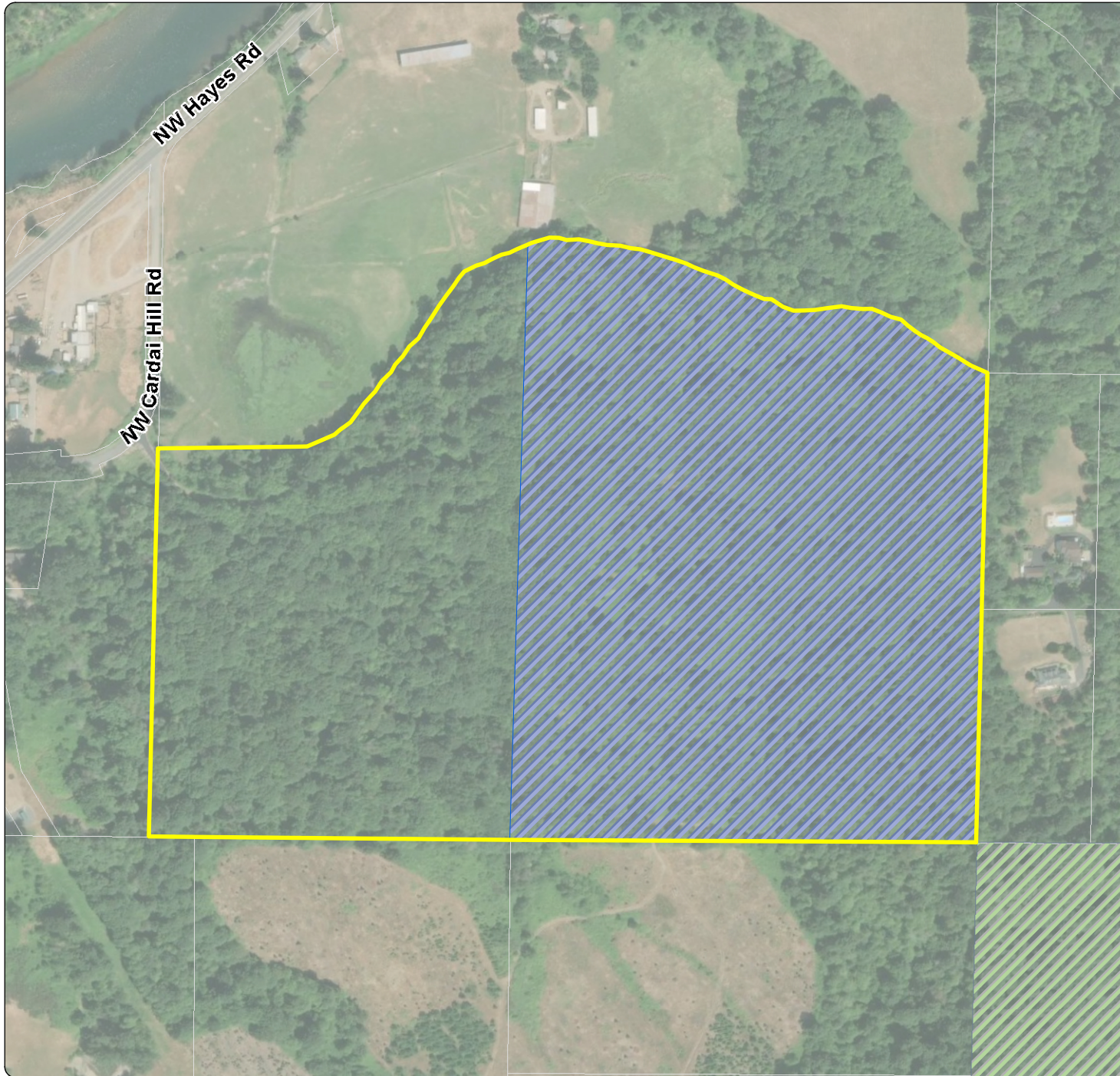


Source:  
 U.S. Geological Survey (2021) 7.5-minute  
 topographic quadrangle: Woodland;  
 Township 5 north, range 1 east, sections 17  
 and 18; property boundary obtained from  
 Clark County GIS.



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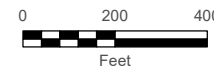


## Figure 2 Site Plan

Cardai Hill Rock Quarry  
Surface Mining  
Overlay Application

### Legend

-  Property Boundary
-  Proposed Surface Mining Overlay District
-  Existing Surface Mining Overlay District
-  Tax Lots



Source:  
Aerial photograph obtained from Oregon  
Statewide Imagery Program.  
Tax lot data obtained from Clark County GIS.

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