



City of Vancouver • P.O. Box 1995 • Vancouver, WA 98668-1995

[www.cityofvancouver.us](http://www.cityofvancouver.us)

**Staff Report and Decision**  
**NE 137th Avenue Improvements Project**  
**PRJ-161362/LUP-70874**

<b>Project Name</b>	NE 137th Avenue Improvements Project
<b>Report Date</b>	February 11, 2019
<b>Proposal</b>	Improvements to NE 137th Avenue between NE 49th Avenue and NE Fourth Plain Blvd. The proposed improvements include curb, gutter, sidewalks and bicycle facilities in addition to roundabouts. The improvements cross fish and wildlife habitat conservation areas, frequently flooded areas and wetlands; a Type I critical areas permit is required.
<b>Location</b>	Eastern side of Vancouver in the NW ¼ and SW ¼ of Section 11 and the NW ¼ of Section 14, Township 2 North, Range 2 East of the WM.
<b>Applicant/ Property Owner</b>	Hassan Abdallah, Engineering Manager City of Vancouver PO Box 1995 Vancouver, WA 98668-1995 360-487-7704
<b>Staff</b>	Mark Person, AICP, Senior Planner
<b>SEPA Determination</b>	Final Determination of Nonsignificance
<b>Staff Decision</b>	Approval with Conditions

**Type 1  
APPEAL**

For a Type I decision, only the applicant and property owner are entitled to an appeal.


The 14-day appeal period is now effect and ends at **4 p.m., Feb. 25, 2019**. You will be notified immediately upon receipt of any appeal to this decision.

Requests to appeal this decision must be made in writing. The letter of appeal shall state the case number designated by the city, the name of the applicant, name and signature of each petitioner, a statement showing that each petitioner is entitled to file the appeal under VMC Chapter 20.210, the specific aspect(s) of the decision and SEPA issue being appealed, the reasons each aspect is in error as a matter of fact or law, and the evidence relied on to prove the error. A substantive appeal of the SEPA determination must be filed in conjunction with and within the limitation period applicable to an available administrative appeal of the applicable permit or approval (VMC 20.790.640.D).


A fee of \$1,826.00 must accompany the appeal. Submit the appeal request and fee to Community & Economic Development Department at the Permit Center, 415 W 6th Street, or mail to PO Box 1995, Vancouver, WA 98668-1995.

Permit center hours are 8 a.m.–12:30 p.m. and 1:30 p.m.–4 p.m., except Wednesday, when permit center hours begin at 9 a.m.

For questions or additional information, you may contact the case manager by telephone at 360-487-7885, or by e-mail at [mark.person@cityofvancouver.us](mailto:mark.person@cityofvancouver.us).

  
\_\_\_\_\_  
Report Prepared By  
Mark Person, Senior Planner/Case Manager

2/14/19  
Date

  
\_\_\_\_\_  
Greg Turner, Manager  
Land Use Team

2.11.19  
Date

## BACKGROUND

The proposal is to improve NE 137th Avenue from NE 49th Street to Fourth Plain Boulevard by modernizing the roadway and adding pedestrian and bicycle facilities. Currently, the corridor has no center turn lanes, medians, bike lanes or continuous sidewalks. Portions of the corridor have curb, gutter and sidewalk, but these are intermittent and may not be in the proper locations.

### Procedural History

Activity	Case #	Date
Pre-application conference waiver	PIR-70976	10/24/18
Application submitted	LUP-70874	12/03/18
Application deemed fully complete		12/18/18
Final DNS		02/11/19

## APPLICABLE REGULATIONS

### Vancouver Municipal Code

VMC Chapters 20.740 Critical Areas Protection; and 20.790 State Environmental Policy Act Regulations.

## ANALYSIS

### Major Issues

Staff reviewed the proposal for compliance with applicable regulations, code criteria and standards in order to determine whether all potential impacts will be mitigated by the requirements of the code. Staff's recommendation reflects review of agency and public comments received during the comment period and knowledge gained from a site visit.

Only the major issues, errors in the development proposal and/or justification for any conditions of approval are discussed below. Staff finds that all other aspects of this proposed development comply with the applicable code requirements and require no discussion in this report.

Building code review is not performed during pre-application or site plan review. Filing of building permit application with required fees and review materials is required for a building code review.

## FINDINGS

### Land Use

**Finding:** This application is reviewed as a Type I application per Table 20.210-1. The application was received November 29, 2018. The application was found to be complete Dec. 18, 2018.

### 20.740 Critical Areas Protection

**Finding:** The subject site is mapped as containing wetlands, frequently flooded areas, fish and wildlife habitat conservation areas. The applicant has submitted a critical areas report prepared by Berger ABAM dated September 2018.

The following section describes how the application meets applicable approval criteria and performance standards of the Critical Areas Ordinance.

#### **VMC 20.740.110 Fish and Wildlife Habitat Conservation Areas**

**Finding:** Final designations shall be based on site conditions and other available data or information (See VMC 20.740.020(C)(1)). There are established in the city the following identified Fish and Wildlife Habitat Conservation Areas:

- a. *Habitat used by any life stage of state or federally designated endangered, threatened, and sensitive fish or wildlife species. A current list of federally and state identified species is available from the planning official.*
- b. *Priority Habitats and areas associated with Priority Species. Current lists of Priority Habitats and Species and applicable Management Recommendations promulgated by the Washington Department of Fish and Wildlife are available from the planning official.*
- c. *Water bodies including lakes, streams, rivers, and naturally occurring ponds.*
- d. *Habitats of Local Importance. Fish and Wildlife Habitat Conservation areas which are not designated as Priority Habitats and Species by the state but are designated as locally significant by the city in accordance with VMC 20.740.100.*
- e. *Riparian Management Areas and Riparian Buffers. The regulated areas include the land from the ordinary high water mark to a specified distance as measured horizontally in each direction. The Riparian Management Area is adjacent to the lake, stream or river, and the Riparian Buffer is adjacent to the Riparian Management Area.*

The proposal will include work within fish and wildlife habitat conservation areas. The report indicates the following:

- The proposal complies with all applicable sections of the ordinance;
- Provides for reasonable use of the property because it is in accordance with existing zoning designations; and
- Includes mitigation measures to ensure no net loss of critical area functions and values.

#### **VMC 20.740.120 Frequently Flooded Areas**

**Finding:** The applicant has submitted a no net increase analysis for the proposed development. The applicant has stated the proposed replacement of existing undersized culvert at the stream will reduce the base flood elevation upstream, reducing flooding risks in the immediate area.

#### **VMC 20.740.140 Wetlands**

**Finding:** The proposed improvements include six different wetlands. All six of the wetlands are rated type III per the applicant's critical areas report. The proposed improvements will include 12,077 square feet (0.28 acres) of temporary wetland impacts, 47,480 square feet (1.09 acres) of permanent wetland impact and 84,298 square feet (1.94 acres) of indirect wetland impact. In addition, the applicant has identified temporary wetland buffer impacts of 13,065 square feet (0.30 acres) and permanent wetland buffer impacts of 145,954.5 square feet (3.35 acres). The applicant has proposed mitigation for wetland and buffer impacts through rehabilitation, restoration and mitigation banks.

#### **VMC 20.740.060 Approval Criteria**

*Any activity or development subject to this chapter, unless otherwise provided for in this chapter, shall be reviewed and approved, approved with conditions, or denied based on the proposal's ability to comply with all of the following criteria. The city may condition the proposed activity*

*as necessary to mitigate impacts to critical areas and their buffers and to conform to the standards required by this chapter. Activities shall protect the functions of the critical areas and buffers on the site.*

A. *Avoid Impacts.* The Applicant shall first seek to avoid all impacts that degrade the functions and values of (a) critical area(s). This may necessitate a redesign of the proposal.

**Staff response:** The applicant has demonstrated avoidance where feasible. Due to the location of the existing right of way and necessary public safety improvements, total avoidance is not possible for this proposal.

B. *Minimize Impacts.* Where avoidance is not feasible, the applicant shall minimize the impact of the activity and mitigate to the extent necessary to achieve the activity's purpose and the purpose of this ordinance. The applicant shall seek to minimize the fragmentation of the resource to the greatest extent possible.

**Staff response:** The applicant has indicated the project includes minimization measures including project design, construction techniques and best management practices to lessen harmful impacts where possible. Additionally, the applicant has stated that minimization measures have been built into the project design that will result in the improvement of existing functions.

C. *Compensatory Mitigation.* The applicant shall compensate for the unavoidable impacts by replacing each of the affected functions to the extent feasible. The compensatory mitigation shall be designed to achieve the functions as soon as practicable. Compensatory mitigation shall be in-kind and on-site, when feasible, and sufficient to maintain the functions of the critical area, and to prevent risk from a hazard posed by a critical area to a development or by a development to a critical area.

**Staff response:** Where impacts cannot be avoided, the applicant has proposed mitigation on-site where feasible. Mitigation that cannot be done on-site will be achieved through the purchase of credits through Terrace Mitigation Bank.

D. *No Net Loss.* The proposal protects or replaces the critical area functions and values and results in no net loss of critical area functions and values.

**Staff response:** The applicant has demonstrated there will be no net loss of function or values for associated with this proposal.

E. *Consistency with General Purposes.* The proposal is consistent with the general purposes of this chapter and does not pose a significant threat to the public health, safety, or welfare on or off the development proposal site;

**Staff response:** Based on the technical information submitted for this project, the proposal is consistent with the general purposes of the Critical Areas Ordinance. The report does not indicate a significant threat to public health, safety or welfare.

F. *Performance Standards*. The proposal meets the specific performance standards of Fish and Wildlife Habitat Conservation Areas VMC 20.740.110, Frequently Flooded Areas VMC 20.740.120, Geologic Hazard Areas VMC 20.740.130, and Wetlands VMC 20.740.140, as applicable.

**Staff response:** A monitoring and maintenance plan will be conditioned as part of this approval.

#### **20.790 SEPA**

**Finding:** A notice of determination of nonsignificance was issued Dec. 26, 2018 (Exhibit 3). A 14-day public comment period was provided. One comment was received from the Department of Ecology dated Jan. 9, 2019 (Exhibit 5). The letter contains standards for toxics cleanup if observed, solid waste management, and water quality. **The applicant shall comply with these requirements during construction.**

After reviewing the comment, it has been determined the original decision was appropriate. This determination is hereby made final.

**Conclusion:** The requirements of SEPA have been met.

### **DECISION**

Approval with conditions.

#### **CONDITIONS OF APPROVAL**

1. Subject to the provisions of the critical areas report dated September 2018.
2. Comply with the Department of Ecology letter dated Jan. 9, 2019.
3. Provide an as-built report when mitigation is complete, any areas within the mitigation that area seeded should be monitored for seed germination and establishment of ground cover for one growing season and hydrology should be monitored for five years in the rehabilitation area to verify that wetland conditions have been restored.

#### **Prior to Construction**

4. Submit revised mitigation plans per the buffer impacts exhibit dated Jan. 25, 2019.
5. Provide a copy of the transfer agreement for the bank credits.

### **EXHIBITS**

1. Application
2. Critical Areas Report dated September 2018\*\*
3. Notice of Nonsignificance dated Dec. 26, 2018
4. SEPA Checklist
5. Department of Ecology Letter dated Jan. 9, 2019
6. Permanent Buffer Impacts dated Jan. 25, 2019

\*\*Because of the size of the exhibit, it is not included with this report. The document is available for review at Community & Economic Development Department, 415 W 6th Street. If you would like to review the document, check in at the reception area of the Permit Center between the hours of 8 a.m.–12:30 p.m. and 1:30 p.m.–4 p.m., except Wednesday, when permit center hours begin at 9 a.m.



# Planning Permit Application

## LAND USE PRELIMINARY APPLICATION (LUP)

415 W 6<sup>th</sup> ST ~ Vancouver, WA 98660  
 PO Box 1995 ~ Vancouver, WA 98668  
 Phone (360) 487-7800  
[www.cityofvancouver.us](http://www.cityofvancouver.us)

Type Of Work		
<input type="checkbox"/> Type I	<input checked="" type="checkbox"/> Type II	<input type="checkbox"/> Type III
<input type="checkbox"/> Type IV	<input type="checkbox"/> Tree Removal Only **	
Use Type (Check One Box Only)		
<input type="checkbox"/> Single Family	<input type="checkbox"/> Commercial	<input type="checkbox"/> Multi-Family
<input type="checkbox"/> Industrial	<input type="checkbox"/> Residential	<input type="checkbox"/> Duplex
<input type="checkbox"/> Wireless Communications Facility (new) please see VMC 20.890		
Process Type		
<input checked="" type="checkbox"/> Standard		<input type="checkbox"/> Streamline

Project Site Information And Location	
Project site address:	
Suite/bldg./apt #:	
Project name:	NE 137th Avenue Corridor Completion Project
Tax Assessor Serial Number:	
Nearest intersection if no site address:	NE 137th Avenue/NE 59th Street

Description Of Project
The City is proposing improvements to NE 137th Avenue between NE 49th Avenue and NE Fourth Plain Boulevard. The project will widen the street to minor arterial standards, including a new stream crossing.

PROPERTY OWNER	
Name	City of Vancouver
Address:	PO Box 1995
City/State/Zip:	Vancouver, WA 98668-1995
Phone:	(360) 487-7704
E-mail:	

APPLICANT	
Name	Public Works c/o M. Hassan Abdalla
Address:	PO Box 1995
City/State/Zip:	Vancouver, WA 98668-1995
Phone:	(360) 487-7704
E-mail (required):	hassan.abdalla@cityofvancouver.us

ELECTRONIC PLANS SUBMITTER*	
Name	BergerABAM c/o Sanja Woehlert
Address:	210 E 13th Street, Suite 300
City/State/Zip:	Vancouver, WA 98660-3231
Phone:	(360) 823-6105
E-mail (required):	sanja.woehlert@abam.com
ePermits Username (if existing account)	sanjawoehlert

Additional Information		
Special Review Type: (if applicable)	<input type="checkbox"/> Tenant Improvement <input type="checkbox"/> Other	
	<input type="checkbox"/> Unoccupied Commercial/Utility Structure	
Plan Approval Type: (if applicable)	<input type="checkbox"/> Conceptual	<input type="checkbox"/> Detailed <input type="checkbox"/> Hybrid
Sewage Disposal:	<input type="checkbox"/> Septic <input type="checkbox"/> Public	
Water Source:	<input type="checkbox"/> Private Well <input type="checkbox"/> Public	
# of Units:		
# of Proposed Lots:		
# of Acres:		
Size:	<input type="checkbox"/> Up to 25 acres <input type="checkbox"/> Over 25 acres	
Impervious Area sf:		
Square Feet:	Ground Floor:	
	Upper Floor:	

Notice
<p><i>I/we understand that per VMC 20.210.090 (Review for Counter Complete Status), if it is determined that the application is not complete, the City shall immediately reject and return the application.</i></p> <p><i>If submitting electronically, I/we understand that if my electronic plan submission is deemed to be incomplete I will receive notification after the prescreening process and review will not begin.</i></p> <p><i>I/we agree that City of Vancouver staff may enter upon the subject property at any reasonable time to consider the merits of the application, to take photographs and to post public notices.</i></p>

Required Signatures	
Applicant signature:	
Print name: M. Hassan Abdalla	Date: 9/21/2018
Property Owner signature:	
Print name: M. Hassan Abdalla	Date: 9/21/18

\* Please note that the contact listed as "Electronic Plans Submitter" should be the individual responsible for accessing ePlans, (electronic plan review software), and will receive all ePlans correspondence.

## EXHIBIT 1



APPLICATION SUB TYPES				
Please check all applicable boxes and enter information where necessary				
<input type="checkbox"/> Archaeological Predetermination (fill out supplemental application)				
<input type="checkbox"/> Binding Site Plan	<input type="checkbox"/> Land Extensive	<input type="checkbox"/> Non-Residential		
	<input type="checkbox"/> Commercial Pad	<input type="checkbox"/> Unoccupied Com/Utility Structure		
<input type="checkbox"/> Boundary Line Adjustment		# of lots to be reviewed:		
<input type="checkbox"/> Comprehensive Plan Amendment				
<input type="checkbox"/> Conditional Use Permit	Type of Use:			
	Civil Review required?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> Covenant Release				
<input type="checkbox"/> Critical Areas Permit (fill out supplemental application)	<input type="checkbox"/> Minor Exception	<input type="checkbox"/> Reasonable Use		
	Area Types:			
	<input type="checkbox"/> Fish & Wildlife		<input type="checkbox"/> Freq. Flooded	
	<input type="checkbox"/> Geological Hazard		<input type="checkbox"/> Wetlands	
<input type="checkbox"/> Design Review (contact case manager for submittal requirements)	<input type="checkbox"/> Vancouver Central Park			
	<input type="checkbox"/> Downtown		<input type="checkbox"/> Exterior Mod. Only	
<input type="checkbox"/> Development Agreement (see VMC 20.250 for requirements)	<input type="checkbox"/> Initial Agreement			
	<input type="checkbox"/> Modification			
	<input type="checkbox"/> Extension			
<input type="checkbox"/> Engineering Variance Request / Road Modification (see supplemental checklist)	<input type="checkbox"/> Administrative			
	<input type="checkbox"/> Design Major			
	<input type="checkbox"/> Technical / Minor			
<input type="checkbox"/> Historic Preservation * (contact case manager for submittal requirements)	Historic Type:			
	<input type="checkbox"/> Major Modification			
	<input type="checkbox"/> Place Property on Registry			
	<input type="checkbox"/> Special Valuation			
	Register Type:			
	<input type="checkbox"/> State		<input type="checkbox"/> Local	
<input type="checkbox"/> National				
<input type="checkbox"/> Human Services Siting Request ( fill out supplemental application)				
<input type="checkbox"/> Joint Use Parking Agreement (see VMC 20.945.030 for requirements)				
<input type="checkbox"/> Legal Lot Determination	# of lots to be reviewed:			
<input type="checkbox"/> Master Plan Public Facilities				
<input type="checkbox"/> Modification	Modification Type:			
	<input type="checkbox"/> Conditional Use	<input type="checkbox"/> Minor		
		<input type="checkbox"/> Major		
	<input type="checkbox"/> Mixed Use Master Plan			
	<input type="checkbox"/> Public Facilities Master Plan			
	<input type="checkbox"/> Planned Unit Development			
	<input type="checkbox"/> Post Decision Review			
Type: <input type="checkbox"/> Planning <input type="checkbox"/> Planning and Engineering				
<input type="checkbox"/> Planned Unit Development / Master Plan	<input type="checkbox"/> Commercial			
	<input type="checkbox"/> Mixed			
	<input type="checkbox"/> Residential			
<input type="checkbox"/> Preliminary Land Division				
Plat Alteration?		<input type="checkbox"/> Yes	<input type="checkbox"/> No	

<input type="checkbox"/> Preliminary Site Plan Review	<input type="checkbox"/> Commercial Pad	<input type="checkbox"/> Land Extensive
	<input type="checkbox"/> Non-Residential	<input type="checkbox"/> Residential
	<input type="checkbox"/> Unoccupied Comm'l/Utility Structure	
<input type="checkbox"/> Shoreline Permit	Request Type:	
	<input type="checkbox"/> Conditional Use	
	<input type="checkbox"/> Variance Request	
	<input type="checkbox"/> Substantial Development	
	Shoreline Designation:	
	<input type="checkbox"/> Aquatic	<input type="checkbox"/> Natural
<input type="checkbox"/> High Intensity	<input type="checkbox"/> Med. Intensity	
<input type="checkbox"/> Urban Conservancy		
<input type="checkbox"/> Similar Use Determination * (see VMC 20.160.030 for requirements)		
<input type="checkbox"/> Statement of Exemption*	Exemption Type:	
	<input type="checkbox"/> Shoreline Permit	
	<input type="checkbox"/> Critical Area Permit	
	Exemptions Requested: (Critical Areas only)	
	<input type="checkbox"/> Fish & Wildlife	<input type="checkbox"/> Wetlands
<input type="checkbox"/> Geological Hazard	<input type="checkbox"/> Frequently Flooded	
<input type="checkbox"/> State Environmental Policy (SEPA) (fill out supplemental application)	Use Type:	
	<input type="checkbox"/> Single Family	<input type="checkbox"/> Other
	SEPA Type:	
	<input type="checkbox"/> Grading	<input type="checkbox"/> Non-Projects
	<input type="checkbox"/> Other	<input type="checkbox"/> Site Plan (RES)
	<input type="checkbox"/> Land-division or PUD	
<input type="checkbox"/> Temporary Use * (see VMC 20.885 for requirements)	Temporary Use Type:	
	<input type="checkbox"/> Commercial/Industrial	
	<input type="checkbox"/> Unforeseen Emergency	
	<input type="checkbox"/> Seasonal or Special Event	
	<input type="checkbox"/> Model Home	
	<input type="checkbox"/> Temp Sales Office	
<input type="checkbox"/> Tree Plan (see VMC 20.770.050 for requirements or see submittal requirement document for additional information)	<input type="checkbox"/> Level 1	<input type="checkbox"/> Level 2
	<input type="checkbox"/> Level 3	<input type="checkbox"/> Level 4
	<input type="checkbox"/> Level 5	<input type="checkbox"/> Level 6
	<input type="checkbox"/> Level 7	
<input type="checkbox"/> Variance	Total # of Variance Requests:	
<input type="checkbox"/> Zoning Certification* (see FAQ document for additional information)	Year Built:	
	Footprint/Lot Coverage:	
	Existing Bldg. Height:	
	Existing # Parking Spaces:	
<input type="checkbox"/> Zoning Verification * (see FAQ document for addt'l information)		
<input type="checkbox"/> Zoning Change	Change Type	With Comp Plan Change?
	<input type="checkbox"/> Map Change	<input type="checkbox"/> Yes
	<input type="checkbox"/> Code Change	<input type="checkbox"/> No
	Proposed Zoning:	

\*These application sub-types must be submitted as a separate LUP application. They may not be bundled with other sub-types.



**EXHIBIT 2**  
**Critical Areas Report**  
**Dated**  
**September 2018**

Because of the size of the exhibit, it is not included with this report. The document is available for review at Community & Economic Development Department, 415 W 6th Street, on the first floor. If you would like to review the document, check in at the reception area of the Permit Center between the hours of 8 a.m.–12:30 p.m. and 1:30 p.m.–4 p.m., except Wednesday, when permit center hours begin at 9 a.m.



## EXHIBIT 3

P.O. Box 1995 • Vancouver, WA 98668-1995  
[www.cityofvancouver.us](http://www.cityofvancouver.us)

Dec. 26, 2018

**Notice of Determination of Nonsignificance (DNS)  
NE 137th Avenue Improvements  
PRJ-161362/LUP-70874**

The City of Vancouver, lead agency, has reviewed the environmental checklist as required by WAC 197-11-330(1). Pursuant to the State Environmental Policy Act (SEPA) and WAC 197-11, it has been determined the following described project will not have a probable significant adverse impact on the environment. An environmental impact statement has been deemed unnecessary.

A final determination of nonsignificance is expected pending a 14-day public comment period.

**Request:** Roadway improvements to NE 137th Avenue from NE 49th Street to Fourth Plain Boulevard. Project will modernize roadway and add pedestrian and bicycle facilities

**Location:** The proposal is located in the NW ¼ and the SW ¼ of Section 11, and the NW ¼ of Section 14, Township 2 North, Range 2 East of the Willamette Meridian.

**Applicant:** Hassan Abdallah, Engineering Manager, PO Box 1995, Vancouver, WA 98668-1995 360-487-7704

**Property Owner:** City of Vancouver, PO Box 1995, Vancouver, WA 98668-1995

**Neighborhood Association:** North Image

The environmental checklist and related information, which are the basis of this determination, are on file and will be made available on request.

The 14-day comment period ends January 9, 2019.

Responsible official is Mark Person, AICP, Senior Planner 360-487-7885, PO Box 1995 Vancouver WA 98668

  
Mark Person

12-26-18

Date

# EXHIBIT 4



## SUBMIT TO:

City of Vancouver  
Community & Economic Development  
415 W. 6<sup>th</sup> ST  
Vancouver, WA 98660  
www.cityofvancouver.us

### SEPA ENVIRONMENTAL CHECKLIST

### WAC 197-11-960

Property Owner: City of Vancouver Telephone: (360) 487-7704  
(Print or Type Name)

Mailing Address: 520 SE 155th Avenue, Vancouver, WA 98668  
(No., City, State, ZIP)

Applicant: M. Hassan Abdalla Telephone: (360) 487-7704  
(Print or Type Name)

Mailing Address: P.O. Box 1995, Vancouver, WA 98668  
(No., City, State, ZIP)

Relationship to Owner: Engineering Manager

Tax Assessor Serial Number(s): N/A: the project is within public right of way

Legal description: Lot(s) N/A Block(s) N/A Plat name N/A  
(If a Metes and Bounds description, check here ☐, and attach narrative to this application.)

Site Address (if any): N/A

② Include 8½" x 11" copies of ☐ Quarter Section Map, ☐ Topographic Map, ☐ Scaled Site Plan. Delineate site on maps.

Notice to Applicants: You must use the current revision of this form or your application will not be accepted. If you use our disk version of this form (MS Word 6.0) you may not alter the format. Make sure you have the current version before submittal.

#### **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:**

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.

#### **Use of checklist for nonproject proposals:**

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**

1. Name of proposed project, if applicable:

*City of Vancouver (City) NE 137th Avenue Roadway Project (project)*

2. Name of applicant:

*Hassan Abdalla, Engineering Manager  
City of Vancouver  
Department of Public Works, Transportation Engineering*

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

*520 SE 155th Avenue  
P.O. Box 1995  
Vancouver, WA 98668-1995  
Phone: (360)487-7704; Fax (360)885-4781; email: hassan.abdalla@cityofvancouver.us*

4. Date checklist prepared:

*September 2018*

5. Agency requesting checklist:

*City of Vancouver Community and Economic Development Department*

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

*The City anticipates a spring 2020 construction start and a fall 2021 conclusion.*

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

*No additional development activities directly related to this project are proposed.*

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

- *BergerABAM, Wetland Delineation and Assessment, City of Vancouver, NE 137th Avenue Corridor Improvements, May 2017*
- *BergerABAM, Biological Assessment, July 2017*
- *Archaeological Investigations Northwest, Inc. (AINW), Cultural Resources Survey, NE 13th Avenue: NE Fourth Plain Boulevard to NE 49th Street, Vancouver, Washington, 1 December 2014*
- *Hart Crowser, Level 1 Hazardous Materials Corridor Assessment, NE 137th Avenue: NE Fourth Plain Boulevard to NE 49th Street, Vancouver, Washington, 9 May 2017*
- *Hart Crowser, Report of Geotechnical Engineering, NE 137th Avenue Corridor Improvements: 49th Street to Fourth Plain Boulevard, Vancouver, Washington, 9 May 2017*
- *HDJ, Stormwater Report, NE 137th Avenue Corridor Completion Project: NE 49th Street to Fourth Plain Boulevard, Vancouver, Washington, December 2016*
- *HDJ, Floodplain No-Rise Analysis Memorandum, 24 June 2016*

- *Michael Minor & Associates, Air Quality Technical Memorandum, 16 November 2016*
- *Michael Minor & Associates, Traffic Noise Analysis, NE 137th Avenue Corridor Completion Project: NE 49th Street to NE Fourth Plain Blvd, November 2016*
- *Washington State Department of Archaeology and Historic Preservation, Finding of No Adverse Effect, 6 January 2015*
- *HDJ, Endangered Species Act Stormwater Design Checklist, January 2017*

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.

*According to the City's current project list, there are no applications which are pending government approval within the limits of the project site.*

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

#### **Federal**

- *NEPA Categorical Exclusion*
- *Endangered Species Act (ESA) Section 7 documentation*
- *Section 106 compliance letter*
- *U.S. Army Corps of Engineers (USACE) Section 404, Nationwide Permit 23, Approved Categorical Exclusions*

#### **State**

- *State Environmental Policy Act (SEPA) determination*
- *Washington State Department of Ecology (Ecology) Construction Stormwater General Permit*
- *Ecology Nationwide Permit*
- *Ecology Section 401 Water Quality Certification*
- *Washington Department of Fish and Wildlife (WDFW) Hydraulic Project Approval*

#### **Local**

- *Critical areas permit (VMC 20.740)*
- *Tree permit (VMC 20.770)*

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 City plans to improve NE 137th Avenue from NE 49th Street to Fourth Plain Boulevard by modernizing the roadway and adding pedestrian and bicycle facilities. Currently, the corridor has no center turn lanes, medians, bike lanes or continuous sidewalks. Portions of the corridor have curb, gutter and sidewalk, but these are intermittent and may not be in the proper locations. The proposed improvements will increase safety, manage access to the fronting properties along NE 137th Avenue, and minimize delay caused by turning vehicles.*

*The improvements will be constructed to City minor arterial standards and will include the following.*

- *Widening the alignment right-of-way to a minimum of 77 feet to accommodate two travel lanes, a center median, bike lanes in both directions of travel, planters, illumination, and continuous sidewalks*
- *Installing three roundabouts at the intersections of NE 137th Avenue with NE 52nd Street, NE 54th Street, and NE 59th Street*
- *Constructing four stormwater detention facilities within the central third portion of the alignment on either side of Burnt Bridge Creek to store runoff.*
- *Constructing stormwater infiltration facilities including bioswales and infiltration trenches to store and infiltrate runoff within the north and south thirds of the alignment*
- *Replacing the existing culvert at the Burnt Bridge Creek crossing with an open bottom arch culvert*
- *Construction of permanent culvert abutments and mechanically stabilized earth (MSE) retaining walls. .*
- *Installation of landscaping, which will generally include street trees, ground cover and shrubs in planter strips adjacent to the project corridor and within roundabouts and medians. Additional vegetation will be installed as part of the project's on-site wetland mitigation.*
- *Excavating unsuitable foundation material to secure footings for the Burnt Bridge Creek bridge and to support the road improvements.*
- *Removal of approximately 3,540 linear feet of soft and organic soils from roughly 400-ft north of NE 52<sup>nd</sup> street to approximately 200-ft north of the existing NE 59<sup>th</sup> Street (137<sup>th</sup> station 110+00 to 145+40).*
- *Approximately 1.09 acres of wetlands are proposed for impact, as well as 5.4 acres of wetland buffer.*
- *No utilities are proposed as part of this project. However, the excavation of organic material starting 400 feet north of 52nd Street and extending 200 feet north of 59th Street will require the removal and replacement of some utilities.*

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 project site is located on the eastern side of Vancouver in the NW 1/4 and SW 1/4 of Section 11, and the NW 1/4 of Section 14, Township 2 North, Range 2 East of the Willamette Meridian. The project site extends along approximately 1 mile of 137th Avenue from NE 49th Avenue (the southern terminus) to NE Fourth Plain Boulevard (the northern terminus). Burnt Bridge Creek is located near the center of the project. All improvements are proposed within the City.*

## **B. ENVIRONMENTAL ELEMENTS**

### **1. Earth**

- a. General description of the site

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

*The project's geotechnical report states that typical road gradients along NE 137th Street are approximately 0 to 3 percent throughout the entire alignment. In addition, the ground surface adjacent to both the east and west sides of NE 137th Avenue is generally level with, or slopes gently away from, the roadway.*

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

*Topography along the NE 137th Avenue alignment is generally flat, with a gradual slope down toward Burnt Bridge Creek on both the north and south sides of the creek. As stated above, the project's geotechnical report identified the steepest slopes on the site as being from 0 to 3 percent.*

- 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.

*The project's geotechnical report used the U.S. Department of Agriculture Web Soil Survey to evaluate the soil composition on the project site, which consists of these soils:*

- *Lauren gravelly loam (LgB), 0 to 8 percent slopes*
- *Semiahmoo muck (Su), shallow variant*
- *Sifton gravelly loam (SvA), 0 to 8 percent slopes*
- *Tisch silt loam (ThA), 0 to 3 percent slopes*

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

*The Clark County MapsOnline database does not indicate any landslide hazards, erosion hazard areas, or slopes greater than 25 percent along the project alignment. Furthermore, no unstable slopes were identified during the geotechnical investigation. Organic-rich soils (e.g., peat) are present throughout the Burnt Bridge Creek floodplain. These soils are weak and compressible. They are susceptible to consolidation and could cause instability if structures or tall embankments were constructed on top of them. However, all organic-rich soils beneath the proposed improvements will be removed and will not affect the proposed improvements adversely. Localized deposits of potentially liquefiable soils were identified near the proposed crossing of Burnt Bridge Creek. The crossing structure will be supported by spread footings which derive their support from beneath the liquefiable soils, so no instability will result.*

- 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.

*The project proposes grading to level the site in a manner consistent with its use as a road. The proposed project would include approximately 85,000 cubic yards of fill and approximately 90,000 cubic yards of cut. Fill required for the project will be imported from a commercial site and will meet Washington State Department of Transportation (WSDOT) fill specifications.*

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



*Grading and vegetation/tree removal activities could result in soil erosion; however, erosion control measures will be used throughout construction. No significant or cumulative adverse impacts to soils are anticipated because of the implementation of and compliance with the applicable erosion control provisions of VMC 14.24, and the provisions of the National Pollutant Discharge Elimination System Construction Stormwater General Permit. Please see the response to section B.1.h for a list of proposed construction best management practices (BMPs).*

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

*Impervious surfaces cover about 40 percent (307,000 square feet) of the project site. The proposed actions would add 201,000 square feet of impervious surfaces. Once the project is complete, about 70 percent of the site (508,000 square feet) will be covered by impervious surfaces.*

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

*BMPs will be employed during the project; these may include, but are not limited to:*

- *Staging in specific areas to reduce erosion*
- *Silt fencing*
- *Temporary seeding*
- *Check dams*
- *Wattles*
- *High visibility fencing*
- *Construction entrance*
- *Stabilized construction entrances*
- *Inlet protection*

*Soil erosion BMPs will be consistent with the erosion prevention and sediment control plan requirements of VMC 14.24.070.*

## 2. Air

- 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.

*It is anticipated that construction of the proposed project will result in minimal short-term impacts to air quality. During construction, increased air emissions will result from the use of heavy equipment and the additional traffic generated by construction workers travelling to and from the site. Emissions will include exhaust from diesel- and gasoline-powered construction equipment, and may also include dust generated by grading activities, wind-blown dust from exposed dirt, and dust from trucks hauling equipment and/or earth material. It is not anticipated that these emissions will result in significant adverse impacts because of the BMP's proposed under section B.2.c below.*

*Traffic generation from the completed project will be a consistent producer of greenhouse gas (GHG) emissions. The potential impact of the project upon air quality was examined under Environmental Protection Agency (EPA) regulations and Federal Highway Administration (FHWA) guidance using traffic operations data. A qualitative analysis of that operational data shows that no modeling of air pollutants associated with traffic on project roadways after construction of the project is necessary in order to establish compliance of the project under EPA*

*regulations. Because this project will not result in any intersections with Level of Service of D or worse, there is no potential for an exceedance of the National Ambient Air Quality Standards for carbon monoxide (CO). Therefore, this project will not increase the severity or frequency of existing exceedances of the CO standards, or cause any new exceedances of the CO standards.*

*A qualitative analysis was also conducted to determine if the project would result in additional Mobile Source Air Toxic (MSAT) compounds in concentrations great enough to constitute an adverse impact. The FHWA considers annual average daily traffic (AADT) volumes of 140,000 trips or more as potential for significant MSAT emissions. According to the project's air quality conformity memorandum, the completed project is projected to generate a volume of 16,000 AADT, which is far below the volume of 140,000 AADT which the FHWA considers significant. Therefore, the project has a low potential for MSAT effects, and will not require mitigation.*

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

*No off-site air emissions or odors are anticipated to affect the project. The project site is located in an area consisting predominantly of low-density residential housing, commercial development, light industrial development, and vacant land. Typical sources of emissions in the project vicinity include exhaust from vehicles and household emissions from wood burning stoves and dryer vents. Dust is likely generated by nearby businesses, including Schram Excavating and Robinson Brothers Construction. However, these emission sources are not likely to affect the proposed project adversely.*

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

*Standard BMPs will be used to minimize dust generation during construction; dust control measures could include applying water for activities such as grading and the outdoor storage of soil, gravel, etc. To limit air quality impacts during construction, construction equipment and vehicles will be outfitted with standard manufacturer's emission control equipment and may also operate using bio-based lubricants and fuels, such as biodiesel. Construction and staging areas will be designed to reduce equipment wait times and engine idling. These measures will reduce fuel consumption and emissions.*

*As discussed in the Air Quality Memorandum by Michael Minor and Associates, no mitigations post construction are required for the project, because it does not meet EPA requirements to conduct modeling.*

### **3. Water**

- a. Surface Water:

- 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.

*The project site is within the jurisdiction of the City and development will be subject to the City's critical areas ordinance (VMC 20.740) and water resources protection ordinance (VMC 14.26). BergerABAM scientists conducted a field investigation to determine the presence or absence of critical areas within the project corridor as defined by the City's critical area protection ordinance.*

As shown in the NE 137<sup>th</sup> Avenue Wetland Delineation report on file with the city, scientists identified six wetlands and one roadside ditch that display wetland characteristics within the project area. The wetlands were rated for their function using the 2014 updated Washington State Wetland Rating System for Western Washington all of the wetlands were classified as Category III wetlands (see the BergerABAM 137th Avenue wetland delineation for more detailed information).

**Summary of Identified Wetland Areas**

Wetland	Wetland Classification			Buffer Width (ft) <sup>c</sup>
	Cowardin <sup>a</sup>	HGM	Wetland Rating <sup>b</sup>	
Wetland A	PEM	Depressional	III	80
Wetland B	PFO	Depressional	III	150
Wetland C	PEM	Slopes	III	150
Wetland D	PEM	Depressional	III	80
Wetland E	PEM	Depressional	III	80
Wetland F	PEM	Slopes	III	80

Notes:

<sup>a</sup> Cowardin et al. (1979) or NWI class based on vegetation: PEM = Palustrine Emergent; PFO= Palustrine Forested

<sup>b</sup> Wetland rating according to Hruby (2006).

<sup>c</sup> Buffer width based on Ecology publication Wetland Mitigation in Washington State (Ecology et al. 2006) and VMC 20.740.140.

The roadway alignment also contains one stream (Burnt Bridge Creek). The creek runs east to west across the project site (underneath NE 137th Avenue) and eventually terminates into Vancouver Lake, approximately 7.80 miles to the west of the project alignment. The creek is approximately 15 feet wide and approximately 2 feet deep. The creek is mapped as critical habitat for Coho salmon, and is also known to support resident and anadromous steelhead/rainbow trout. VMC 20.740.110 protects the creek and designates and protects its associated riparian management area and riparian buffers. As a Type F fish-bearing stream, the creek requires a 100-foot riparian management area and a 75-foot riparian buffer. The riparian management area extends out from the delineated ordinary high water mark (OHWM) of the stream, and the riparian buffer extends out, adjacent to the management area, to the distance established by the VMC or to the 100-year floodplain, whichever is farther landward.

- 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.

Improvements to the NE 137th Avenue roadway and the construction of roundabouts at the intersections of NE 137th with 52nd, 54th, and 59th streets will require work within 200 feet of the waterbodies described above. Construction, including culvert replacement and removal of peat material when in conflict with the culvert footings and the expanded road bed will occur within the waters of Burnt Bridge Creek. In addition, other road widening activities and associated grading/filling will also occur within wetlands A through F and their buffers.

Total avoidance of impacts to wetlands, wetland buffers, riparian areas and riparian buffers in the project area is not feasible as the improvements will be located along the existing alignment to reduce right-of-way impacts to adjacent properties. All construction will occur within the existing road prism.

*Approximately 1.09 acres of wetlands are proposed for impact, as well as 5.4 acres of wetland buffer. An additional 0.3 acres of Bunt Bridge Creek's riparian buffer will also be impacted.*

- 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.

*The project will require fill placement in wetlands in order to construct the road improvements. The following table shows the quantities of fill for each wetland affected by the project and its source.*

<b>Wetland</b>	<b>Fill Volume (CY)</b>	<b>Area of Site Affected (Acres)</b>	<b>Source of Fill Material</b>
A	3,120	0.41	Commercial Site
B	10	0.01	Commercial Site
C	1,030	0.13	Commercial Site
D	8,480	0.18	Commercial Site
E	280	0.06	Commercial Site
F	2,010	0.3	Commercial Site
<b>Total</b>	<b>14,930</b>	<b>1.09</b>	<b>Commercial Site</b>

*The Biological Assessment states the project proposes approximately 900 cubic yards of cut and 700 cubic yards of fill below the OHWM, for a net cut of approximately 200 cubic yards for the creation of the new channel and open-bottom arched culvert.*

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

*The NE 137<sup>th</sup> Avenue Corridor Completion Biological Assessment, on file with the City of Vancouver states:*

*"During the construction of the new open-bottom arch culvert and channel, the contractor will detour all traffic on NE 137<sup>th</sup> Avenue and close both lanes. The contractor will install the culvert and construct the new stream channel under dry conditions. The existing road and roadbed fill material will be removed and all material hauled to an upland location. The contractor will use excavators to dig the new 15,500-square-foot channel and haul all excavated organic material off site to an approved upland location. Approximately 900 cubic yards of organic material will be excavated. The contractor will place pre-cast concrete foundation footings for the culvert and install the culvert on the footings. The culvert wingwalls will be cast in place and allowed to cure. Finally, the road retaining walls and road grading to subgrade will be completed. The new channel will be lined with rock to stabilize it and the area outside of the new culvert will be seeded and planted for stability.*

*Upon completion of the new channel and culvert, Burnt Bridge Creek will be rerouted during the in-water work window (1 August – 31 August). All culvert removal work below the ordinary high water mark (OHWM) of the creek will occur under dry or dewatered conditions. During the road and culvert removal process, before any activity takes place below the OHWM, the contractor will isolate the area by establishing temporary sandbag cofferdams upstream and downstream of the existing culvert and pumping the water from the isolated area. The cofferdams will be installed and the area dewatered according to WSDOT fish exclusion protocols and standards (2012) to minimize the extent of any impact to ESA-listed fish species that may be present within the action area. The proposed fish exclusion method will alleviate the need for fish handling. A fish biologist will be on site and will plan the staging and sequence for work area isolation and dewatering. Generally, before the upstream cofferdam is established, an upstream block net will be installed to prevent fish from moving into the work area from upstream. A second net will be used to herd fish downstream. After the seining, the contractor will place the sandbags for the downstream cofferdams.*

*The temporary cofferdams will be constructed to a height extending above the estimated ordinary high water elevation (approximately 192 feet NGVD 1929), and will be covered with a waterproof polyester silt barrier or similar material. The construction of the upstream cofferdam will occur first and the installation of the downstream cofferdam will follow. Once the waterproof cofferdams have been established, water will be directed into the new channel. Water within the cofferdams will be pumped out slowly and either be discharged directly to the creek or, if necessary, be pumped to an upland location for settling and/or infiltration.*

*Water discharged to the creek will not exceed the turbidity criteria identified in Washington Administrative Code (WAC) 173.201A-030 beyond the authorized turbidity mixing zone for waters below 10 cubic feet per second at the time of construction (which is defined as an area 100 feet downstream of the project activities). If turbidity levels beyond the limit of the mixing zone do not exceed 5 nephelometric turbidity units (NTU) above background, when the background is less than or equal to 50 NTUs, or does not exceed 10 percent above background NTUs when background is more than 50 NTUs, water will be slowly pumped from the area within the cofferdams into the creek. If turbidity levels exceed the above-stated thresholds, then water will be pumped to an upland location for settling and/or infiltration.*

*Once the area between the cofferdams has been dewatered, the upstream block net will be removed and any fish and other aquatic species will have access to the new channel. Work will then start within the isolated area to remove the old culvert and continue construction of the roadway as described above. Pumps may be run throughout the culvert removal and road building process to keep the work area dry, and any turbid water will be directed to an upland location for settling or infiltration. Once the road has been completed, approximately 700 cubic yards of organic material will be used to fill in the remnant channel. The upstream channel will be filled to the cofferdam. A small portion of downstream remnant channel will remain as off-channel habitat. Upon completion, the cofferdams will be removed by hand and the area will be seeded and planted.*

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

*According to Federal Emergency Management Agency (FEMA) Map Number 53011C0391D, Panel 0391D, for Clark County, Washington and Incorporated Areas, dated 5 September 2012, portions of the project corridor adjacent to*

*Burnt Bridge Creek are located within the special flood hazard area subject to inundation by the 1 percent annual chance flood (i.e., the 100-year flood).*

*Per the no net rise study conducted by HDJ, Burnt Bridge Creek is conveyed under NE 137th Avenue through a 40-inch-diameter culvert. Due to the small size of this culvert, the elevation of the 100-year floodplain drops approximately 1 foot on the downstream side of NE 137th Avenue. The existing floodplain is elevation 194.73 downstream of NE 137th Avenue and elevation 195.38 on the upstream side. The location of the 100-year floodplain associated with Burnt Bridge Creek has been marked on the project plans submitted under separate cover to the City.*

- 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 waste will be discharged into surface waters surrounding the project site.*

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.

*No water will be withdrawn from wells and/or discharged into surrounding groundwater as a result of the project.*

- 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.

*No waste materials will be discharged into the ground. In summary of the hazardous material assessment conducted for the project alignment it was stated "Older properties along the project corridor have septic systems that may not have been properly closed when the city sewer lines were installed. To ensure that project does not conflict with any septic tanks, locations of the septic tanks will be confirmed prior to construction."*

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including stormwater) 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 stormwater facilities within the project limits include infiltration systems on the north end of the project near NE Fourth Plain Boulevard, and conveyance systems collecting and routing stormwater from adjacent developments to Burnt Bridge Creek. The existing infiltration and conveyance systems will remain, while parallel systems will be constructed to collect water generated by the project improvements.*

*The road widening and improvement project will result in the addition of 2.90 acres of impervious surface along the road corridor which will result in a greater quantity of stormwater runoff that needs to be captured and treated. A portion of the stormwater generated by the project will be captured, treated, and discharged*

to wetlands recharging in order to maintain existing hydroperiod fluctuations. A small portion of the alignment will continue to allow project-related stormwater to flow off site to existing infiltration facilities. Stormwater in these areas cannot be captured because of topography and will mimic existing flows to these facilities. The remaining stormwater runoff generated within the project, and not accounted for above, will be treated and infiltrated, or detained prior to discharging into Burnt Bridge Creek through the use of 19 bioretention facilities and 4 detention ponds.

The City has directed that the project use the WSDOT 2014 Highway Runoff Manual (HRM) with the February 2016 supplement, the City of Vancouver's Surface Water/Stormwater Design and Construction General Requirements, and the Department of Ecology's Stormwater Management Manual for Western Washington as reference for design. In order to address increased and altered water runoff, the project includes four threshold discharge areas (TDAs) which were compared both together and individually per the nine requirements defined in the HRM. As stated in the Final Stormwater Report, on file with the city, the four TDAs are:

**TDA1** – Consists of the southern portion of the study area, and extends from NE 49th Street to the northern limits of the NE 52nd Street roundabout. The geotechnical borings and test pits found that infiltration is possible here. A minimum post-correction factor infiltration rate of 1 inch per hour was established. All runoff in TDA 1 will be infiltrated

**TDA 2** – Includes areas of the project where infiltration is infeasible and encompasses the area between TDAs 1, 3, and 4. TDA 2 contains a large area of organic-rich soil material and wetlands. Stormwater in TDA 2 will be treated, collected, detained, and released into Burnt Bridge Creek.

**TDA3** – Consists of the northern portion of the project where infiltration is possible. Per the geotechnical borings and test pits, a minimum post-correction factor infiltration rate of 1 inch per hour was established. TDA 3 extends from just north of NE 59th Street (NE 137th Avenue Station 145+40) to NE Fourth Plain Boulevard. All runoff in TDA 3 will be infiltrated.

**TDA4** – Encompasses a small portion of NE 59th Street, west of NE 137th Avenue. Its areas of impervious and pollution-generating impervious surface (PGIS) do not meet the minimum thresholds for water quality and quantity (less than 5,000 square feet of new PGIS and 10,000 square feet of new impervious area). Drainage will continue to flow off site to the west for more than a quarter-mile through existing conveyance systems and will outfall to Burnt Bridge Creek."

The table below summarizes impervious surfaces and land disturbance in the four TDAs.

Activity	Project Areas (acres)	TDA 1 Areas (acres)	TDA 2 Areas (acres)	TDA 3 Areas (acres)	TDA 4 Areas (acres)
Existing Impervious Surface	6.9	1	4.3	1.5	0.1
New Impervious Surface	4.7	0.7	3.7	0.3	0
Replaced Impervious Surface	6.0	0.8	3.7	1.4	0.1
Native Vegetation Converted to Lawn/Landscaping	0.5	0.1	0.39	0*	0*
Land Disturbing Activity	17.4	2.2	13.1	2	0.1

\* Existing on-site landscape is negligible



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

*A spill prevention, control and countermeasures (SPCC) plan, as well as a temporary erosion and stormwater control (TESC) will be implemented to prevent waste materials from entering ground and surface waters during construction. Stormwater improvements including infiltration systems, bioretention facilities, and detention ponds will be employed to prevent waste from entering ground or surface waters. Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.*

*No, drainage patterns will not be altered. Drainage within the NE 137<sup>th</sup> Avenue corridor currently flows toward Burnt Bridge Creek which is at the center of the project and will continue to do so upon the completion of the road improvements. Upon completion of safety improvements and stormwater systems, the drainage patterns will remain and water will continue to drain to Burnt Bridge Creek. Stormwater improvements include new conveyance systems, infiltration systems, bioretention facilities, and detention ponds. The project improvements will conform to design requirements outlined by the Highway Runoff Manual and the February 2016 supplement.*

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

*As stated above, existing stormwater infrastructure will be used where it has been determined to be adequate to serve the proposed project, and new storm drainage infrastructure will be installed throughout other portions of the alignment. The new stormwater infrastructure includes measures for the collection, conveyance, treatment, and detention of stormwater runoff. Please see the response to 3.c.1 above. Construction stormwater BMPs recommended in the Final Stormwater, on file with the city, include:*

- *Create and follow a Soil Prevention, Control, and Countermeasures (SPCC) plan.*
- *Create and follow Temporary Erosion and Sediment Control (TESC) plan.*
- *Silt Fencing, high-visibility fencing, temporary seeding, wetland restoration seeding*

#### 4. Plants

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

\_\_\_deciduous tree: **alder**, maple, aspen, **other**,  
**balsam poplar, Oregon ash, Cottonwood,**  
**Juniper, Apple, Plum, Elm, Ginko, Monkey**  
 evergreen tree: **fir**, cedar, **pine**, **other**  
 \_\_\_ Shrubs: **snowberry, Nootka rose**  
 \_\_\_ **Grass**  
 \_\_\_ **Pasture**  
 \_\_\_ Crop or grain  
 \_\_\_ Orchards, vineyards or other permanent crops.  
 \_\_\_ Wet soil plants: **cattail, buttercup, bulrush**, skunk cabbage, other:  
 reed canary grass, sweet vernal grass, velvetgrass, colonial  
 bentgrass, white clover, ox eye daisy, English plantain, common  
 comfrey, and soft rush

water plants: water lily, eelgrass, milfoil, other  
 \_\_\_\_ Other types of vegetation

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

*Approximately 2 acres of mostly herbaceous vegetation will be removed or altered for this safety improvement project. Approximately 132 trees will be removed from the site including the following species; Fir, Pine, Spruce, Apple, Elm, Plum, Ginko, Monkey, Cottonwood, Juniper, and Pear.*

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

*No threatened or endangered plant species are known to be on or near the site.*

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

*Landscaping will include replacing existing landscaping displaced by construction activities and will consist of street trees, shrubs, and ground cover plantings. Approximately 235 street trees and 8,960 shrubs will be planted as part of this project.*

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

*According to project's critical areas report on file with the city, the following noxious or invasive species have been identified on or near the project site:*

- *Reed canarygrass* (Phalaris arundinacea)
- *Ox eye daisy* (Leucanthemum vulgare)
- *English plantain* (Plantago lanceolata)
- *Common comfrey* (Symphytum officinale)
- *English ivy* (Hedera helix)
- *Himalayan blackberry* (Rubus armeniacus)

## 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:

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.

*Threatened or endangered species known to exist on or near the site include steelhead and Coho salmon. These fish species use Burnt Bridge Creek which is classified as habitat for federally designated endangered, threatened, and sensitive fish species.*

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

*Burnt Bridge Creek is a migration route for steelhead and Coho salmon and rainbow trout. In addition, the general project area is within the Pacific Flyway, a broad migratory corridor that extends from Alaska to Central America. The site could provide stop over for migrating waterfowl and other passerine birds.*

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

Wildlife minimization measures include the proposed alignment location and best management practices. The proposed alignment is located along the existing roadway alignment minimizing impacts that would be associated with a new roadway. Best management practices that will be implemented as part of the project that will minimize impacts to wildlife are listed below. A full list of BMPs is included in the Biological Assessment on file with the city.

- *No contractor staging areas will be within 200 feet of any potential wetland, stream, estuary, river, or marine drainage as identified by the project biologist, unless site-specific review completed by the project biologist indicates that no impacts to the sensitive resource areas will occur due to topography or other factors*
- *The contractor will protect all inlets and catchments from stormwater runoff from fresh concrete, tackifier, paving, or paint striping in case inclement weather occurs unexpectedly.*
- *All unstable slopes resulting from construction activities with a high likelihood of delivery of material to listed species-bearing waters will be stabilized within 2 days from 1 October to 30 April, and within 7 days from 1 May to 30 September.*
- *Construction equipment will not enter any waterbody without authorization from WDFW, National Marine Fisheries Service (NOAA Fisheries), or U.S. Fish and Wildlife (USFWS), as appropriate. Equipment will be operated as far from the water's edge as possible.*
- *All equipment will be fueled and maintained more than 200 feet from the nearest wetland, ditches, flowing or standing water, unless site-specific review completed by the project biologist indicates that no impacts to the resource areas will result due to topography or other factors. Exceptions to this requirement are allowed for large cranes, pile drivers, and drill rigs if they cannot be moved easily.*

Enhancements (culvert and meandering stream)

*Temporary impacts to Burnt Bridge Creek will be offset through design characteristics built into the project. Mitigation for temporary impacts will include the installation of a natural-bottom stream passage at the stream crossing, and meandering of the stream. The new stream crossing will improve fish passage and, unlike conventional culverts, should be more resilient to changes in stream and landscape changes. (For example, down cutting in streams creates fish passage barriers when surface water levels downstream fall below the bottom edge of culverts; natural-bottom passages allow streams to undergo natural processes without impeding fish passage.) Meandering the stream will provide additional stream complexity and improve habitat functions and values in the project area.*

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

*Habitat adjacent to the project alignment may be suitable for bullfrogs and nutria, which are invasive species; however, there have been no documented sightings of these animals.*

## 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.

*The project includes placing street lights within the right of way on the east and west sides of the corridor. Approximately 63 luminaires are proposed as part of the*

*proposed improvements. The luminaires will be powered by electricity. See detail T21-02 on file with the City.*

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

*The road improvements will have few vertical structures and will therefore have no effect on the use of solar energy by adjacent 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:

*Energy conservation measures employed by the project include installation of LED lighting fixtures for approximately 63 luminaires. LED lighting requires less electricity for operation and, compared to incandescent light bulbs, its bulbs have a much a longer life.*

## **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

*Fossil fuels will be used during project construction; however, the contractor will provide a site-specific spill prevention plan, which will include proactive measures for preventing spills as well as a spill response plan. To the extent practicable, all equipment will be fueled and maintained at least 150 feet from stream crossings and wetlands. Secondary containment will be used if required. Equipment will be inspected daily for leaks and proper function to ensure that all equipment is clean and free of external petroleum-based products. Any waste resulting from the project will be disposed of at a site properly permitted for that type of waste.*

*New paving for the roadway will include the use of hot mixed asphaltic concrete (HMAC) and will be constructed in accordance with WSDOT Standard Specifications for Road, Bridge, and Municipal Construction (WSS) 5-04-Hot Mix Asphalt (WSDOT 2016).*

*The completed project is not anticipated to result in any increased environmental health hazards. Improvements to the road will enhance public safety. Upon completion of construction, all potentially hazardous substances will be removed from the site.*

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

*The proposed project corridor activities along NE 137th Avenue include widening portions of the existing two-lane road into a three-lane road, with bike lanes and sidewalks, and constructing roundabouts. The project corridor consists of an area approximately 1 mile long, and the project would affect an estimated 25 feet along each side of the corridor, with larger areas around the intersection improvements. Research indicates that the lands surrounding the project corridor were historically used for agricultural, residential, and some commercial activities. A full hazardous materials corridor assessment was completed for the project by Hart Crowser and is provided under separate file with the City. The findings indicate that these potential environmental conditions (PECs) could exist within the immediate vicinity of the project.*

- *Historical records indicate the former use of the land adjacent to the project corridor for orchards and agriculture. Past use of pesticides and herbicides could have impacted the soil and groundwater within the proposed construction areas. However, no sites indicating known pesticide-impacted or herbicide-impacted sites within this project corridor are listed in Ecology databases.*
- *Stormwater runoff from the roadway may contain petroleum products, which may have impacted surface soils. Roadway maintenance activities, including herbicide application along the right of way, may also have impacted surface soils and wetland areas.*
- *Treated telephone poles and pole transformers are present and would require special handling according to Ecology regulations if they require removal or replacement. Removal of telephone poles and pole transformers is the responsibility of the utility company.*
- *Historical records indicate that two automobile repair facilities and an asphalt paving company were formerly located along the corridor and there is an existing gasoline service station. Hart Crowser's site reconnaissance identified three locations on or adjacent to the corridor where vehicle maintenance is performed.*
- *Older houses that may be removed as part of the proposed construction may contain hazardous building materials, including asbestos-containing materials, lead-based paint, and fluorescent or mercury-vapor lightbulbs.*
- *An abandoned underground storage tank was identified on a property adjoining the corridor and heating oil tanks may be present.*
- *Solid waste, including tires, metals, wood, and old vehicles, is present on properties that may be acquired as part of the proposed construction.*
- *A few water wells were observed or identified at different properties along the project corridor.*
- *Older properties along the project corridor have septic systems that may not have been properly closed when the City sewer lines were installed.*

*Based on the assessment performed by Hart Crowser, Federal Superfund sites are not located within a mile radius of the project corridor. Five state hazardous waste sites, no leaking underground storage tanks (LUST), and five underground storage tanks (UST) are located within a half mile radius of the project corridor. Of those identified in the assessment, one former generator of hazardous waste, and two UST were located within or immediately adjacent to the project corridor.*

- 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.

*Gas main, distribution, and service lines owned and operated by Northwest Natural occur within the project alignment. A 4-inch diameter wrapped steel high pressure gas main (250 psig) runs along the south side of Fourth Plain Boulevard, with an associated fenced-off regulator at the southwest corner of the intersection with 137th Avenue. Additionally, a 4-inch-diameter polyethylene gas main runs south along the west side of NE 137th Avenue from NE 49th Street to Fourth Plain Boulevard. There are several 2-inch-*

*diameter polyethylene distribution lines that tee from this 4-inch-diameter main to serve the subdivisions along the intersecting streets. In addition, there are numerous small diameter (1-inch and less) service lines that tee directly from the 4-inch-diameter polyethylene main to serve residents along 137th Avenue. These gas facilities will be relocated during project construction but will not affect the design of the project.*

*In addition to the potential environmental contaminants listed above the following hazardous conditions are present on properties adjacent to the roadway as described in the Hazardous Materials Assessment on file with the City:*

- *Pesticide and Herbicide associated with historical orchards and agriculture may have impacted the soil and groundwater within the Project Corridor*
- *Presence of treated poles and pole transformers.*
- *Historic stormwater runoff containing petroleum products and metals from vehicle usage may have impacted soils adjacent to the roadway.*
- *Presence of solid waste including tires, metals, wood and old vehicles on properties adjacent to the roadway.*
- *Some properties adjacent to the roadway use septic systems.*
- *Three locations adjacent to the site were identified where vehicle maintenance is currently performed.*

- 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.

*During construction, hot asphalt will be brought to the site during the road improvements.*

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

*The project will not require special emergency services pertaining to hazardous or toxic materials during construction or operation.*

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

*As stated above, a spill prevention plan will be implemented during project construction. If contaminated materials are discovered during construction, then the applicant will follow the Ecology guidelines for remediation. As described in the Hazardous Materials Assessment if hazardous building materials are encountered, these materials would be taken to a certified landfill that accepts hazardous materials.*

- *Treated telephone poles and pole transformers will be performed by the utility company and will require special handling according to Standard Specification Section 00290.20(c).*
- *A construction contingency plan (CCP) should be prepared and should include the discovery of previously unidentified water wells and septic systems within the right of way.*

- *A soil management plan (SMP) should be prepared and used to assist in managing any potential environmental impacts if observed or encountered during construction.*
- *A soil investigation should be conducted to assess potential impacts due to pesticide and herbicide usage,*

b. Noise

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

*Michael Minor & Associates performed a traffic noise analysis for the NE 137<sup>th</sup> Corridor Completion project and is on file with the city.*

*Noise in the project area is generated by vehicular traffic on existing roadways. The project area consists of one state route (East Fourth Plain Boulevard), one minor arterial (NE 137th Avenue), one urban collector (NE 49th Street), and seven unclassified (NE 52nd, 59th, 61st, 64th, 65th, 66th, and 67th streets) roadways. These noise sources are not expected to affect the project.*

*Surrounding land uses include residences, a park, an office building, retail facilities, light industry, warehouses, and vacant land. The noises associated with the surrounding land uses are not expected to affect the project. On-site noise monitoring and traffic counts were performed at seven locations and measured noise levels ranged from 47-58 dBA Leq. The dominant noise source at all of the monitoring locations was traffic on NE 137th Avenue.*

- 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.

*The traffic noise analysis model prepared by Michael Minor & Associates predicts an increase of up to 7dB above existing noise levels by 2035. This increase would only be 3dB greater than the noise levels predicted with a no-build alternative scenario. Areas that are predicted to see an increase in noise levels are areas around NE 59th Street as this roadway will be open in the future. Alternatively, some areas are predicted to have decreased noise levels due to changes in traffic patterns or roadway alignment. No locations with substantially increased noise levels (10dB or more) are expected in connection with the proposed project.*

*The Traffic Noise Analysis prepared by Michael Minor and Associates, on file with the city, states that "construction noise levels for the proposed project improvements would result from normal construction activities. Noise levels for construction activities can be expected to range from 70 to 95 DBA at sites 50 feet from the activities. Temporary construction noise is exempt from volume limits (WAC 173-60-050). Because noise from the proposed project is not expected to exceed the levels specified in WAC 173-60-040 and VMC 20.935, no mitigation is required. The project will comply with the City's noise ordinance, which allows project construction from 7:00 a.m. to 8:00 p.m. if the construction is within 300 feet of a residential area and from 7:00 a.m. to 10:00 p.m. under the WAC in all other areas."*

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

*No significant noise impacts will occur; therefore, no mitigation measures have been proposed.*



## 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.

*The project site consists of City right of way. Adjacent land uses along the roadway include residential, light commercial, light industrial, office, and a park. The City will be acquiring approximately 13.50 acres of additional right of way to complete the project; therefore, properties adjacent to the existing roadway improvements will undergo a land use change to public right-of-way.*

- 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?

*No commercially significant working farms or forest lands are located adjacent to the project alignment.*

- 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:

*There are no working farm or forest lands adjacent to the alignment; therefore, no conflicts between the proposal and farm or forest operations will occur.*

- c. Describe any structures on the site.

*Structures located within the project alignment include two houses, utility poles and boxes, mailboxes, signs, street lights, traffic signs, fences, and a traffic light.*

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

*In order to accommodate the expanded road, utility poles, light poles, mailboxes, fences/gates, and two houses (5113 NE 137<sup>th</sup> Ave and 5818 NE 137<sup>th</sup> Ave) will be removed.*

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

*According to VMC 20.130.050(A), zoning boundaries extend to the centerline of public rights of way; therefore, the project alignment (NE 137th Avenue) and roadways adjacent to the project site consist of the following zones: light industrial (IL), community commercial (CC), general commercial (CG), and residential (R-18, R-9, and R-6).*

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

*The project site abuts City of Vancouver Comprehensive Plan designations commercial (COM), industrial (IND), and residential (UL and/or UH).*

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

*According to the City's Shoreline Master Program the project site does not contain waters subject to shoreline master program jurisdiction; therefore, no shoreline master program designation exists for the site.*

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

*The project area contains five critical areas, including wetlands, fish and wildlife habitat conservation areas, frequently flood areas, geologically hazardous area, and critical aquifer recharge areas.*

### **Wetlands**

*Six Category III wetlands and one roadside ditch that displays wetland characteristics are located in the central portion of the study area near the Burnt Bridge Creek corridor. These wetlands are subject to the wetland critical areas ordinance (VMC 20.740.140). Because these wetlands are located in a high-intensity area (VMC Table 20.740.140-5) with low habitat function, wetland buffer zones are considered to be 80 feet per VMC 20.740.140 (C)(1)(b).*

### **Fish and Wildlife Habitat Conservation Areas**

*Burnt Bridge Creek is categorized as a Type F fish-bearing stream under WAC 222-16-031(3)(i)(A). The stream crosses generally perpendicular to, and underneath, NE 137th Avenue. The stream is considered local critical area habitat under VMC 20.740.110(A) for federally endangered, threatened, and sensitive fish species (i.e., Coho and steelhead salmon). Because NE 137th Avenue crosses the stream, roadway improvements will be located within the 100-foot riparian management area and the 75-foot riparian buffer as well as within the stream itself.*

*BergerABAM scientist used a combination of online resources and site evaluations to determine the presence of sensitive species and habitat. The critical areas report on file with the city states that Burnt Bridge Creek is a “known migration/occurrence location for Rainbow/Steelhead trout and Coho salmon and the project area is shown as mapped within freshwater emergent and forested/shrub priority wetland habitats.” Additionally, the USFWS classifies Burnt Bridge Creek as Critical Habitat for Coho Salmon.*

### **Frequently Flooded Areas**

*According to FEMA FIRM panels 53011C0391D and 53011C0392D, a portion of the project site is located within the 100-year floodplain of Burnt Bridge Creek along the east and west sides of NE 137th Avenue. The floodplain has a base flood elevation of 194.73 (west of NE 137th Avenue) to 195.38 feet (east of NE 137th Avenue). It extends approximately 800 feet north and 400 feet south of the creek (west side of roadway) and approximately 650 feet north and 275 feet south of the creek (east side of the roadway). Additionally, work within Burnt Bridge Creek itself (replacement of the existing culvert) will be conducted within a designated floodway.*

### **Geologic Hazard Areas**

*The Clark County MapsOnline shows that an area between NE 54<sup>th</sup> Way and NE 57<sup>th</sup> Street is considered a peat deposit and is designated a critical area under VMC 20.740.130.A.2.a.1. Areas of peat deposits are classified as a seismic hazard area due to liquefaction or dynamic settlement hazard.*

### **Critical Aquifer Recharge Areas**

*Additionally, the entire City of Vancouver is classified as being within a critical aquifer recharge area as the boundaries are within the Troutdale Aquifer. However, no part of the roadway project is within 1900 feet of any municipal water supply well.*

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

*The proposed project does not include the construction of any residences, and no one will live within the completed project area.*

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

*Acquiring right of way will require the acquisition of two single-family structures by the City – 5113 NE 137th Avenue and 5818 NE 137th Avenue. Therefore, these structures and their residents will be displaced as a result of the project.*

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

*The alignment of the proposed roadway was put through an extensive alternatives analysis. One criterion was impacts to structures, and the proposed alignment was shifted to minimize impacts to residents. Property will be acquired according to state regulations and the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA). A five-step process will be used to acquire the properties in question, as follows:*

*1. Acquisition of preliminary title reports to review for encumbrances, liens, or defects for impacted properties along roadway alignment.*

*2. Completion of right-of-way project funding estimate in conformance with WSDOT LAG Manual.*

*3. A WSDOT-approved appraiser will conduct an appraisal that will conform to the Uniform Standards Professional Appraisal Practice (USPAP). An appraisal review will be conducted by another WSDOT-approved appraiser.*

*4. Negotiation and acquisition for appraised properties with property owners. Property owners/tenants will be given reasonable opportunity to consider offers and present material believed relevant to determining the value of the property.*

*5. Documentation that right-of-way has been acquired in compliance with the Uniform Act. The City will certify the right-of-way through WSDOT.*

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

*The project will comply with the City's code and standard details for a T10-12 minor arterial. The code implements the City's Comprehensive Plan and land use map. The proposed road improvements along 137th Avenue are consistent with, and included in, the City's Comprehensive Plan as a designated proposed street improvement. The project is a permitted use in all zoning designations and will also will meet operational standards (VMC 11.80.130B) as detailed in the traffic analysis performed by Kittelson & Associates on file with the City.*

*The area within the vicinity of NE 137<sup>th</sup> Avenue is projected to include future residential, commercial, and industrial development. This development will directly impact the roadway. As identified in the Traffic Analysis Report prepared by Kittelson & Associates the single lane roundabout option proposed would operate acceptably and is projected to accommodate year 2035 traffic volumes*

*The proposed redevelopment is consistent with the 2035 Regional Transportation Plan and this section of the 137th corridor is identified as an area for mobility*

*improvements. The NE 137th Avenue Corridor Completion project was identified and included in the Washington State Transportation Improvement Program.*

Therefore, the proposed road improvements are consistent with existing and project land uses and plans. *All necessary federal, state, and local permits (see section A.10) will be obtained to ensure compatibility with relevant plans.*

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

*Parcels 109650000, 107835000, 109591000, 109614002, 158597000 contain pasture and are adjacent to the roadway. No commercially significant working farms or forest lands are adjacent to the project alignment.*

## 9. Housing

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

*No housing is proposed for the project.*

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

*Completing this project will eliminate two structures – the houses located at 5113 and 5818 NE 137th Avenue.*

*According to Clark County MapsOnline, the assessed value as of January 1, 2016, for 5113 NE 137th Avenue was \$197,797. According to the mortgage calculator on [www.bankrate.com](http://www.bankrate.com) a building assessed at this value with an annual interest rate of 3.81% would have an estimated monthly mortgage payment of \$923. Over a 12-month period, the projected mortgage cost is approximately \$9,876. According to income guidelines provided by the Vancouver Housing Authority a household of four at 30% AMI would annually pay \$7,380 if 30% of their income went towards housing costs. Alternatively, a household of four at 80% AMI spending 30% of their income would annually pay \$17,925 at 80% AMI (30% of \$59,750) The annual estimated housing cost for the unit located at 5113 NE 137th Avenue is between the cost for households making 30% and 80% AMI and is considered low income housing.*

*Additionally, as part of the NEPA process, BergerABAM completed an environmental justice report to determine the effect of the project on minority or low-income populations. The report determined that the project would not adversely affect minority or low-income populations and met the provisions of Executive Order 12898, as it is supported by Title VI of the Civil Rights Act.*

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

*The project alignment was selected to reduce impacts to existing houses. Furthermore, the City will pay fair market value for the acquired properties as determined by a WSDOT-approved appraiser.*

## 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?

*The tallest structures proposed are the light poles that will be approximately 30 feet tall. The poles' principal exterior material will be aluminum or composite.*

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

*The proposed project will not result in any altered or obstructed views in its immediate vicinity. The light poles are the tallest structures but they are narrow and will not obstruct or significantly alter views.*

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

*There will be no increase in adverse aesthetic impacts to the project site, as the use (road) and its extent will remain generally the same. The applicant proposes additional landscaping to enhance the aesthetics of the road. Landscaping will generally include plantings of trees, shrubs, and groundcover along the road and within the roundabouts. Landscape plans are included as part of the attached site plans.*

## 11. Light and glare

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

*63 luminaires are proposed along NE 137th Avenue. Light will be produced during low light periods (evening, night, and early morning) as well as during adverse weather conditions. According to the lighting plans on file with the City, the proposed lighting will use LED bulbs, and be downward-directed.*

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

*Light generated by the project will not interfere with views or result in a potential safety hazard. Street lights will be installed along the NE 137th Avenue road alignment; however, light and glare will be produced only during low light and adverse weather conditions. Lighting will enhance safety for motorists, pedestrians, and bicyclists once road construction is complete.*

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

*No adverse impacts from off-site light sources are anticipated to affect the project. The area around the project site primarily consists of undeveloped land and residential, light industrial, and commercial uses. The light produced by these land uses is not significant and will not affect the normal use and function of the roadway.*

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

*To reduce light and glare impacts, street lighting will be installed in accordance with VMC 11.50.070 and comply with roadway illumination standards outlined in T21 (Lighting) of the City's Transportation Standard Details manual, including being downward-directed.*

## 12. Recreation

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

*According to the City of Vancouver's Comprehensive Parks, Recreation, and Natural Areas Plan 2014-2020 the project site is located within the City's Fifth Park District. The following official and unofficial recreational facilities exist within the vicinity of the site.*

- Burnt Bridge Creek Elementary School
- Burnt Bridge Creek Park
- North Image Neighborhood Park
- Sifton Elementary School
- Sifton Neighborhood Park
- Heritage High School

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

*The project will not result in permanent impacts to recreational resources. During the construction of the project, temporary delays could occur for people who would use 137th Avenue as their primary access to the recreational resources listed in section 12.a.*

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

*The project will not adversely impact recreational resources in the area on a permanent basis. NE 137th will be closed in phases depending on the portion of roadway under construction. The project will not directly impact any recreational resources. The purpose of the project is to bring NE 137th Avenue up to the City's current minor arterial street standards. The project will include the construction of sidewalks and bike lanes, resulting in greater connectivity and access to recreational resources for pedestrians as well as enhanced walking and biking opportunities. Residents who use NE 137th Avenue to access recreational resources will be able to use alternate routes such as NE 121st Avenue and 162nd Avenue.*

### 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.

*The cultural resources study was conducted for the project and was completed in 2014. The report, titled "Cultural Resource Survey for the NE 137th Avenue Corridor Completion Project, NE 49th Street to NE Fourth Plain Boulevard, Vancouver, Clark County, Washington," by Archaeological Investigations Northwest, Inc. (AINW), noted the project's area of potential effect (APE) included 24 historic properties/structures that were 45 years or older. The report concludes that of the 24 properties analyzed, 22 were not recommended as being eligible for listing in the National Register of Historic Properties. The two eligible resources (two Bonneville Power Administration electrical transmission lines and towers) would not be affected by the proposed project. WSDOT reviewed the project and agreed with these determinations of eligibility and effect; the Washington State Department of Archaeology and Historic Preservation (DAHP) agreed with the WSDOT determinations in a letter dated 6 January 2015 (DAHP Log 081414-20-FHWA).*

- 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.

*The cultural resource study identified one archaeological isolate, 45CL1086, within the APE. However, this archaeological resource was recommended to not be eligible for listing in the National Register as the artifact was not likely to yield information important to the prehistory of the area. WSDOT and the DAHP reviewed the project and agreed with this determination of eligibility.*

- 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.

*AINW reviewed records available online from the Washington Information System for Architectural and Archaeological Records Data (WISAARD) database as well as materials on file in the AINW library to determine if recorded archaeological or historic resources were located within or near the project APE. The records were also reviewed to identify previous archaeological surveys in the project vicinity.*

*The methodology used for field surveying, as part of the archaeological survey, included excavating 69 shovel tests. Shovel test locations were chosen to adequately sample the APE, taking into consideration paved areas and utility locations. The shovel tests were generally cylindrical, 12 inches in diameter, and excavated to depths of at least 20 inches. Nine shovel tests were excavated deeper using a 6-inch manual bucket auger to search for deeply buried archaeological deposits. Excavated sediments were screened through nested quarter- and eighth-inch mesh hardware cloth. All excavated materials were returned to the shovel tests when completed.*

*On August 26, 2014, AINW architectural historians conducted a survey of historic resources within the project APE and on parcels crossed by the APE. Resources were identified by using Clark County Tax Assessor records, historical aerial maps available online, and field observation to identify buildings and structures built in or before 1969 meeting age criteria for consideration for listing in the National Register.*

- 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.

*Contractors in charge of site development will halt all ground-disturbing activities if any unanticipated archaeological resources are encountered during construction. In the event of a discovery of an archeological resource, DAHP should be notified so that the resource can be properly evaluated. The two eligible properties (a pair of BPA electrical transmission lines crossing the project) will not be modified directly or indirectly, and will be avoided.*

#### 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.

*The project site (NE 137th Avenue) is accessed by East Fourth Plain Boulevard to the north and East 49th Street to the south with NE 52nd, 54th, 59th, 61st, 63rd, 64th, 65th, 66th, and 67th streets located between. The streets located along NE 137th Avenue primarily access residential neighborhoods and commercial businesses (see the site plan and vicinity map submitted separately).*

- 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 project site is not served by public transportation. C-TRAN is the City's public transportation authority and two C-TRAN bus lines serve the project site's vicinity.*



*Route 74 serves East Fourth Plain Boulevard (the northern boundary of the project site) and Route 30 serves NE 39th Street (south of the project site). The closest stops are located at the intersection of NE 137th Avenue and East Fourth Plain Boulevard and 0.50 mile south of the project site at the intersection of NE 39th Street and NE 137th Avenue.*

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

*Parking will not be impacted by the project. No parking stalls are located along NE 137th Avenue, and although the project includes roadway improvements/expansion, no parking will be added.*

- 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).

*The project consists of widening NE 137th Avenue from 49th Street to Fourth Plain to include bicycle lanes, three roundabouts, curb and gutter, and sidewalks. Approximately 12,300 linear feet of paved bicycle facilities are included in the project, in addition to 11,700 linear feet of pedestrian facilities. The project includes clearing and grubbing, roadway excavation, culvert replacement, cement amended base, retaining walls, stormwater facilities, paving with hot-mix asphalt, driveway reconstruction, landscaping and an irrigation system, erosion control, traffic control, pavement markings, illumination system, organic-rich soil removal, and wetland mitigation.*

*The design of the project is based on several sources: "Proposed Guideline for Pedestrian Facilities in the Public Right-of-Way" (U.S. Access Board 2011); "Manual on Uniform Traffic Control Devices" (Federal Highway Administration 2009, incl. 2012 revisions); "Guide for the Planning, Design, and Operation of Pedestrian Facilities" (American Association of State Highway and Transportation Officials 2004); and WSDOT design criteria and specifications to comply with the Americans with Disabilities Act.*

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

*The proposed project will not use water, rail, or air transportation, but will occur in the general vicinity of air transportation. The Fly for Fun Airport is 20 acres in size and located approximately 1 mile north of the project site at 8807 NE 142nd Avenue. This public-use airport is listed under the WSDOT aviation identification number W56. Facilities at the airport are limited and include a total of seven aircraft tie-downs and one hangar and services are limited to local, single-engine aviation traffic (approximately 3,350 flights in 2015).*

- 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?

*The completed project will not generate vehicular traffic as the project does not propose a use that would increase trip demand. The vehicle miles traveled is estimated to be slightly higher than the alternative of not building the road improvements. The increased capacity of the roadway also increases efficiency and will likely attract rerouted trips from the surrounding transportation network.*

- 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.

*There are no working farms or forest lands adjacent to the project alignment. Therefore, the project is not likely to interfere with, affect, or be affected by movement of agricultural and forest products.*

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

*The only identified transportation project are expected to be short-term closures due to construction. The attached site plans produced by HDJ (pages 162-164) show the precise locations for road closures, signage, and construction staging areas. The traffic control plan would close portions of NE 137th Avenue (phase-dependent). Measures to address the traffic impacts to the project area are separated into two stages. Stage 1 will close NE 137<sup>th</sup> from 52<sup>nd</sup> Street to the southern side of the driveway south of 61<sup>st</sup> Street. This stage will also close 59<sup>th</sup> and 52<sup>nd</sup> Street within the limits of the project. All residences will have detour routes available, and will have access to their properties. This stage is anticipated to take 6 to 9 months.*

*Stage 2 will involve the construction of the remaining portions of 137<sup>th</sup>, this will involve single lane closures and flagging. This stage of design is anticipated to take 6 to 9 months. For residents having NE 137th Avenue as their only access route, local access will be granted. When NE 137th Avenue is closed, alternate routes will be used.*

## 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.

*Roadway improvements are not anticipated to create increased demand for public services. However, construction may affect emergency service routes. Vancouver Fire Station 4 will be impacted and firefighters/EMTs will likely need to take the alternate routes of 121st or 162<sup>nd</sup> during the duration of the road closure (approximately 9 months) to reach properties to their immediate south. The fire station to the south of the project will address any fire service impacted by the rerouting of Fire Station 4, thereby ensuring continued emergency services during project construction.*

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

*No permanent impacts on public services are proposed. However, the applicant will submit a traffic control plan to mitigate potential impacts emergency service routes during construction of the project.*

## 16. Utilities

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

*According to a utility report conducted for the project site in February 2015 by Murray, Smith & Associates, Inc., the following utilities and utility providers have services within the project area:*

- *Water – The City provides water transmission and distribution facilities throughout the project area.*

- Sanitary sewer – The City has extensive sanitary sewer collection and conveyance facilities throughout the project site.
  - Storm sewer – The City owns storm sewer facilities throughout the project site.
  - Natural gas – Northwest Natural owns and operates underground gas facilities within the project limits.
  - Electricity – Clark Public Utilities (CPU) owns and operates underground and aerial electric power transmission and distribution lines throughout the project area (communication providers, including CenturyLink and Comcast, have aerial facilities on CPU poles).
  - Electricity – Bonneville Power Administration owns and operates a high voltage aerial transmission line crossing diagonally to NE 137th Avenue in the vicinity of NE 59th Street.
  - Communications – Comcast Cable has aerial communication facilities attached to CPU-owned utility poles within the project limits.
  - Communications – CenturyLink has facilities on both sides of NE 137th Avenue from NE 49th Street to Fourth Plain Boulevard.
- 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.

No new utilities are proposed as part of this project. However, the excavation of organic material starting 400 feet north of 52nd Street and extending 200 feet north of 59th Street (approximately 0.5 miles) will require the removal and replacement of some existing utilities. All existing underground utilities except sanitary sewer will be removed within the area of organic-rich soil removal. Additional water and sewer lines in the area will be replaced as needed with the design being completed by the City under a separate permitting process. All dry utilities in the area will self-perform relocation as needed. Service disruptions are anticipated to be relatively minimal due to the lack of residences in the project area.

### 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: \_\_\_\_\_

Name of signee: \_\_\_\_\_

Position and Agency/Organization: \_\_\_\_\_

Date Submitted: \_\_\_\_\_

*M. Hassen Abdalla*  
*M. Hassen Abdalla*  
*Engineering Manager, City of Vancouver*  
*9/18/18*

**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?

Proposed measures to avoid or reduce such increases are:

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

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

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

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

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?

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

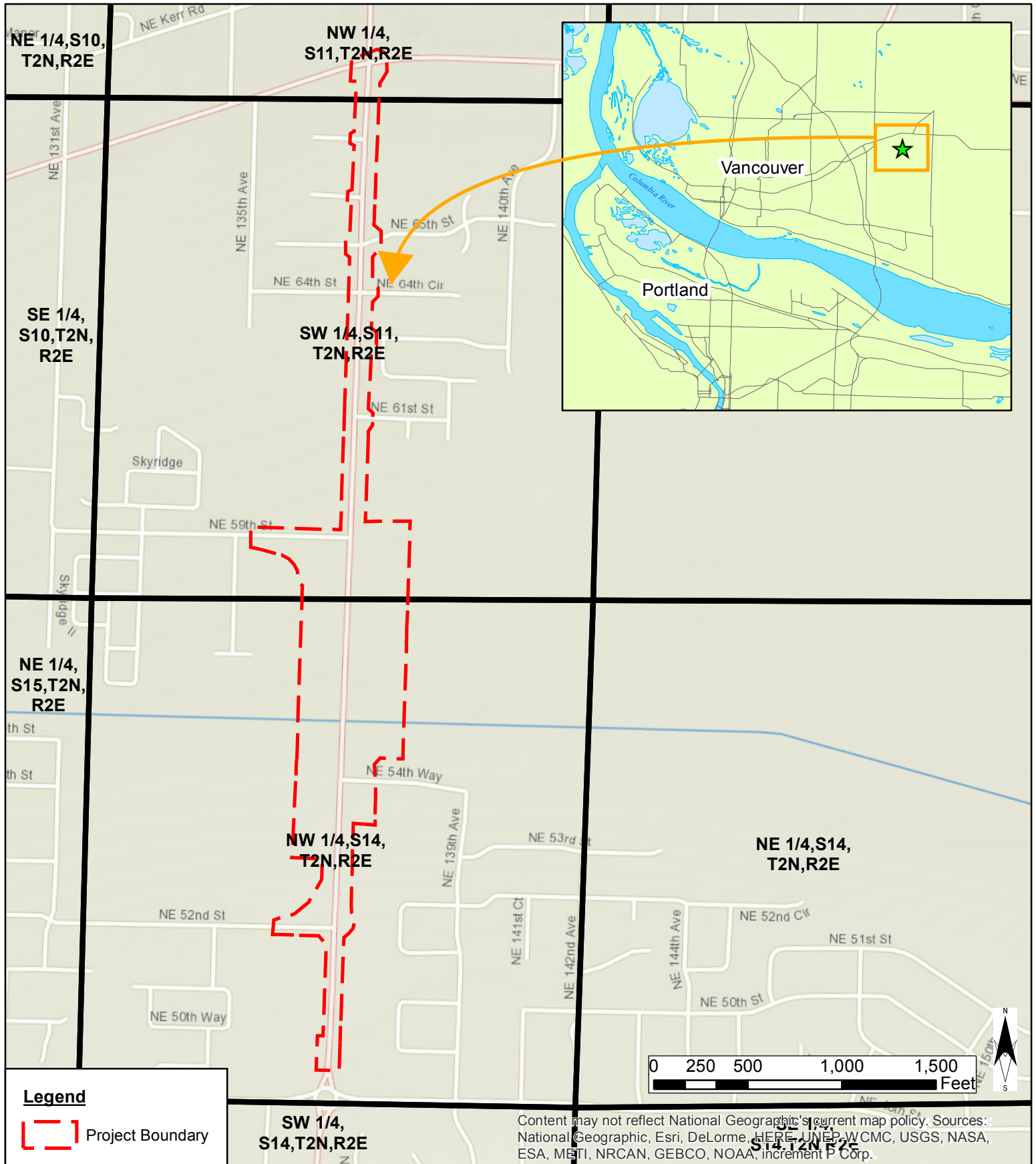
5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

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

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

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

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



NE 137TH AVE. CORRIDOR  
COMPLETION PROJECT

APPLICANT: CITY OF VANCOUVER  
ATTN: HASSAN ADBALLA  
415 W 6TH STREET  
VANCOUVER, WA 98660

PURPOSE: BIOLOGICAL ASSESSMENT

FIGURE 1 - VICINITY MAP



PROJECT AREA IN: BURNT BRIDGE CREEK  
WATERSHED

LEGAL: SW 1/4 SECTION 11 & NW 1/4  
SECTION 14, TOWNSHIP 02N, RANGE 02E, W.M.

CITY: VANCOUVER  
COUNTY OF: CLARK  
STATE OF: WASHINGTON



NE 137TH AVE. CORRIDOR  
COMPLETION PROJECT

APPLICANT: CITY OF VANCOUVER  
ATTN: HASSAN ADBALLA  
415 W 6TH STREET  
VANCOUVER, WA 98660

PURPOSE: SEPA

Site Plan



PROJECT AREA IN: BURNT BRIDGE CREEK  
WATERSHED

LEGAL: SW 1/4 SECTION 11 & NW 1/4  
SECTION 14, TOWNSHIP 02N, RANGE 02E, W.M.

CITY: VANCOUVER  
COUNTY OF: CLARK  
STATE OF: WASHINGTON



## EXHIBIT 5

STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

*PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341*

January 9, 2019

Mark Person, AICP, Senior Planner  
City of Vancouver  
Community & Economics Development  
PO Box 1995  
Vancouver, WA 98668

Dear Mark Person:

Thank you for the opportunity to comment on the determination of nonsignificance for the NE 137th Avenue Improvements Project (PRJ-161362, LUP-708740). The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**SHORELANDS & ENVIRONMENTAL ASSISTANCE:  
Rebecca Rothwell (360) 407-7273**

Ecology is currently working with BergerABAM on the wetland mitigation proposal. For questions or technical assistance, please contact Ecology Wetlands/Shorelands Specialist, Rebecca Rothwell, via email at [Rebecca.Rothwell@ecy.wa.gov](mailto:Rebecca.Rothwell@ecy.wa.gov) or phone at (360) 407-7273.

**TOXICS CLEANUP: Craig Rankine (360) 690-4795**

There are known contaminated site(s) within approximately half-a-mile of the proposed SEPA action. The site(s) include, but may not be limited to following, see Ecology Facility Site ID No's, site name and project manager:

- 3844822 J & S Steel (no project manager assigned, contact Craig Rankine [360] 690-4795)
- 74748387 Electro Tech Metal Finishing (Adam Harris [360] 407-6528)

If environmental contamination is discovered at the site of the proposed action, it must be reported to Ecology's Southwest Regional Office by contacting the Environmental Report Tracking System Coordinator at (360) 407-6300. For assistance regarding cleanup information on sites listed above contact the Ecology project manager. The applicant should make sure only clean soil is used as fill. Provisions and equipment should be on hand to contain and cleanup a release of oil or fuel from heavy equipment operation.



## **WATER QUALITY: Chris Montague-Breakwell (360) 407-6364**

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

The following construction activities require coverage under the Construction Stormwater General Permit:

1. Clearing, grading and/or excavation that results in the disturbance of one or more acres **and** discharges stormwater to surface waters of the State; and
2. Clearing, grading and/or excavation on sites smaller than one acre that are part of a larger common plan of development or sale, if the common plan of development or sale will ultimately disturb one acre or more **and** discharge stormwater to surface waters of the State.
  - a) This includes forest practices (including, but not limited to, class IV conversions) that are part of a construction activity that will result in the disturbance of one or more acres, **and** discharge to surface waters of the State; and
3. Any size construction activity discharging stormwater to waters of the State that Ecology:
  - a) Determines to be a significant contributor of pollutants to waters of the State of Washington.
  - b) Reasonably expects to cause a violation of any water quality standard.

If there are known soil/ground water contaminants present on-site, additional information (including, but not limited to: temporary erosion and sediment control plans; stormwater pollution prevention plan; list of known contaminants with concentrations and depths found; a site map depicting the sample location(s); and additional studies/reports regarding contaminant(s)) will be required to be submitted.

You may apply online or obtain an application from Ecology's website at:

<http://www.ecy.wa.gov/programs/wq/stormwater/construction/> - Application. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater from construction activities and must submit it on or before the date of the first public notice.

## **SOLID WASTE MANAGEMENT: Derek Rockett (360) 407-6287**

All grading and filling of land must utilize only clean fill. All other materials may be considered solid waste and permit approval may be required from your local jurisdictional health department prior to filling. All removed debris resulting from this project must be disposed of at an approved site. Contact the local jurisdictional health department for proper management of these materials.

Mark Person, AICP, Senior Planner

January 9, 2019

Page 3

Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology  
Southwest Regional Office

(MLD:201807150)

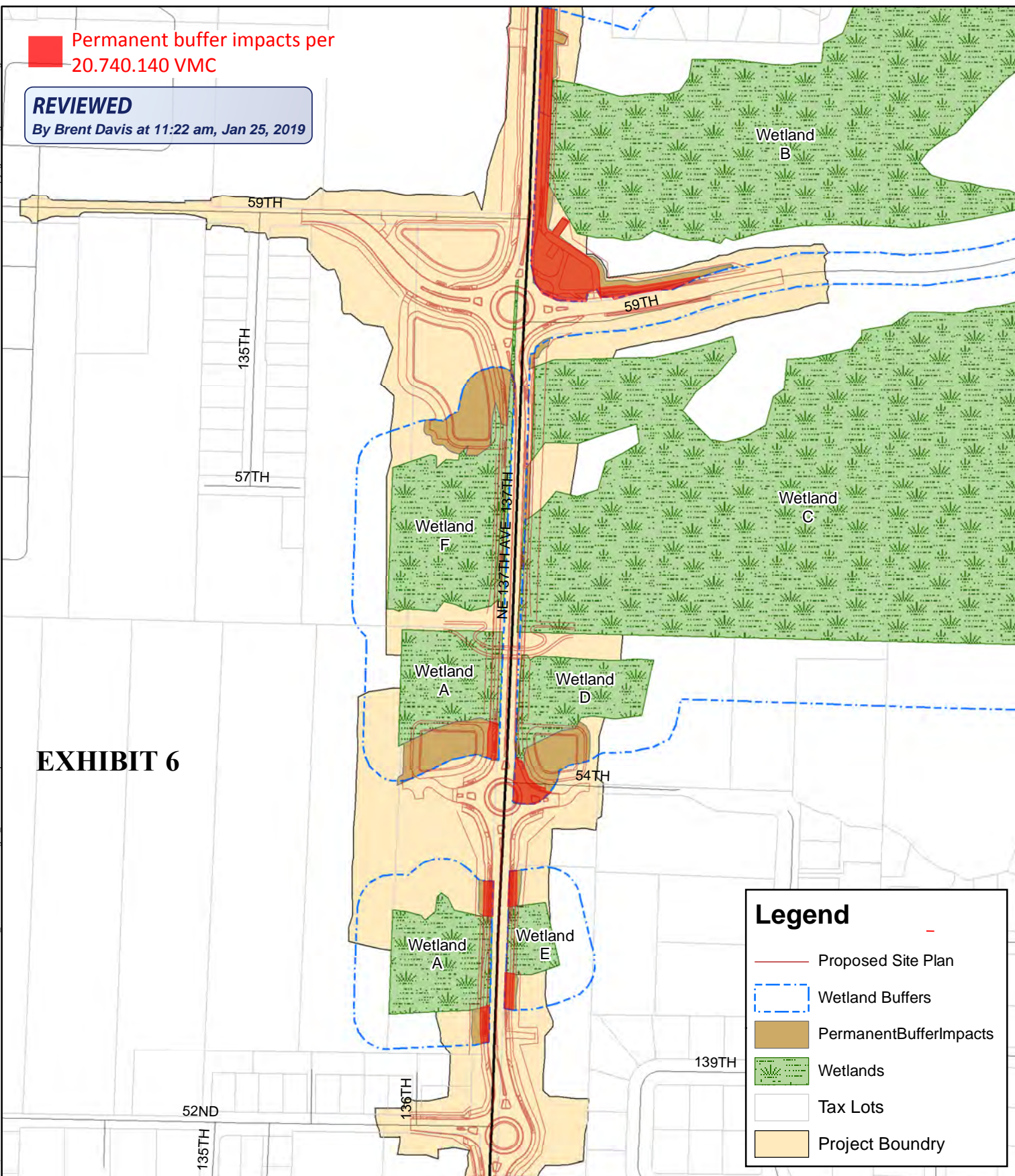
cc: Rebecca Rothwell, SEA  
Craig Rankine, TCP/VFO  
Adam Harris, TCP  
Chris Montague-Breakwell, WQ  
Derek Rockett, SWM  
Hassan Abdallah, Engineering Manager, City of Vancouver (Proponent)

Permanent buffer impacts per  
20.740.140 VMC

**REVIEWED**

By Brent Davis at 11:22 am, Jan 25, 2019

## EXHIBIT 6



PURPOSE: CRITICAL AREAS REPORT

STATE: Washington

COUNTY: Clark

APPLICANT: City of Vancouver

P.O. Box 1995

Vancouver, WA 9868-1995

**137th Ave. Corridor Completion**  
NE Fourth Plain Blvd to NE 49th St



0 100 200 400 Feet

**FIGURE 17: PERMANENT WETLAND  
BUFFER IMPACTS**

WATERWAY: Burnt Bridge Creek

LATITUDE: 45°40'04.01"N

LONG: 122°31'54.25"W

S/T/R: S11 & 14 T2N R2E



February 2018

Figure 17 of 19