



## CASTLE ROCK PLANNING COMMISSION

Regular Meeting and Public Hearing: Tuesday, January 21, 2025  
6:00 PM

### Location

Castle Rock Senior Center  
222 Second Ave SW  
Castle Rock, WA 98611

## AGENDA

To join this meeting from your computer, tablet or smartphone: <https://meet.goto.com/216918261>  
To join this meeting using your phone: +1 (224) 501-3412 Access Code: 216-918-261 (Press \*6 to speak)  
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### 1. CALL TO ORDER

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- a. Roll Call

### 2. APPROVAL OF MINUTES

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- a. December 17, 2024 Planning Commission Regular Meeting and Continued Public Hearing Minutes

### 3. CITIZEN COMMENTS

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### 4. REPORTS

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### 5. PUBLIC HEARING - LARGE LOT SUBDIVISION EXEMPTION ORDINANCE

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- a. Open the Public Hearing on the Draft Large Lot Subdivision Exemption Ordinance
- b. Agenda Report
- c. Public Comment

### 6. OLD BUSINESS

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- a. Discuss and Possibly take action on the Large Lot Subdivision Exemption Ordinance
- b. Nominate and Elect a Planning Commission Chairperson
- c. Nominate and Elect a Planning Commission Vice Chairperson

### 7. NEW BUSINESS

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### 8. ADJOURNMENT

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### UPCOMING MEETINGS:

**February 18, 2025**

**March 18, 2025**

**April 15, 2025**

Non-Discrimination Statement: This institution is an equal opportunity provider and employer. If you wish to file a Civil Rights program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, found online at [https://www.ascr.usda.gov/sites/default/files/Complain\\_combined\\_6\\_8\\_12\\_508\\_0.pdf](https://www.ascr.usda.gov/sites/default/files/Complain_combined_6_8_12_508_0.pdf) or at any USDA office, or call 866.632.9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter by mail to USDA, Office of the Assistant Secretary for Civil Rights, 1400 Independence Ave, SW, Stop 9410, Washington, DC 20250-9410 or email to [program.intake@usda.gov](mailto:program.intake@usda.gov) or by fax (202) 690-7442.

Title VI: The City of Castle Rock ensures compliance with Title VI of the Civil Rights Act of 1964 and American Disabilities Act of 1990 by prohibiting discrimination against any person on the basis of race, color, national origin, sex or disabilities in the provision of benefits and services from its federal assisted programs and activities. If you need special accommodations to participate in this meeting,

please contact Karlene Akesson at 360.274.8181 by 9:00 a.m. three days prior to the meeting.

Planning Commission may add and take action on other items not listed on this Agenda.

## **1. CALL TO ORDER**

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Chairperson Rick Sullivan called the regular meeting to order at 6:00 pm.

### **a. Roll Call**

Members present: Chairperson Rick Sullivan, Vice-Chair Matt Rasmussen, Commissioners Richard Skreen, Ryane Olin, David VanCamp, and Robert Frazier

Staff present: Contracted Planner Kirsten Peterson, Mayor Paul Helenberg, and Secretary Karlene Akesson

## **2. INTRODUCTIONS**

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### **a. Introduce Incoming Planning Commissioner Robert Frazier**

Commissioner Robert Frazier introduced himself.

### **b. Introduce Planner Kirsten Peterson**

Contracted City Planner Kirsten Peterson introduced herself.

## **3. APPROVAL OF MINUTES**

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### **a. October 15, 2024 Planning Commission Regular Meeting**

Commissioner Matt Rasmussen motioned, seconded by Commissioner David VanCamp, to approve the October 15, 2024 Planning Commission Regular Meeting minutes as presented. Motion carried by roll call vote. Commissioners Rick Sullivan, Matt Rasmussen, Richard Skreen, Ryane Olin, David VanCamp, and Robert Frazier voted 'Aye'.

### **b. November 19, 2024 Planning Commission Regular Meeting and Public Hearing Minutes**

Commissioner Matt Rasmussen motioned, seconded by Commissioner Richard Skreen, to approve the November 19, 2024 Planning Commission Regular Meeting and Public Hearing minutes as presented. Motion carried by roll call vote. Commissioners Rick Sullivan, Matt Rasmussen, Richard Skreen, Ryane Olin, David VanCamp, and Robert Frazier voted 'Aye'.

## **4. CITIZEN COMMENTS**

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## **5. REPORTS**

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## **6. CONTINUED PUBLIC HEARING - CRITICAL AREAS ORDINANCE (CAO)**

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### **a. Reopen the Public Hearing on the Draft CAO and the Draft CAO Manual**

Chairperson Rick Sullivan closed the Planning Commission Regular Meeting at 6:04 pm and reopened the Public Hearing for the Critical Areas Ordinance (CAO) at 6:04 pm.

### **b. Agenda Report**

Contracted City Planner Kirsten Peterson presented.

c. Public Comment

Ingrid Friedberg of Tapani provided comment.

Chairperson Rick Sullivan closed the Critical Areas Ordinance (CAO) Public Hearing at 6:16 pm and reopened the Planning Commission Regular Meeting at 6:17 pm.

## **7. OLD BUSINESS**

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a. Discuss the Draft CAO and the Draft CAO Manual

Commissioner Richard Skreen requested the definition of what a density transfer process entails. Planner Kirsten Peterson provided a generalized example of a density transfer and offered to look up an official definition. Citizen Ingrid Friedberg provided comment. Planner Kirsten Peterson provided additional comment. Commissioners Richard Skreen and Ryane Olin provided comment. Commissioner David VanCamp stated it (the Critical Areas Ordinance) should be put on hold. Planner Kirsten Peterson provided comment. Commissioner Rick Sullivan provided comment. Planner Kirsten Peterson recommended to the Planning Commissioners that the public hearing could be closed and when the Critical Areas Ordinance has been revised to address the comments received, a new SEPA Checklist and readvertisement of a Public Hearing could be done. Commissioners Matt Rasmussen, Rick Sullivan, Ryane Olin, and Planner Kirsten Peterson provided comment. Commissioner Rick Sullivan provided comment.

Commissioner Ryane Olin motioned, seconded by Commissioner David VanCamp, to close public comment until a later date while staff goes over the letters from Fish and Wildlife and Ecological Land Services, and comments from the public. Motion carried by roll call vote. Commissioners Rick Sullivan, Matt Rasmussen, Richard Skreen, Ryane Olin, David VanCamp, and Robert Frazier voted 'Aye'.

## **8. NEW BUSINESS**

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Chairperson Rick Sullivan requested the Planning Commission hold elections during the January 2025 Regular Planning Commission meeting to allow everyone a fair opportunity to serve as Chairperson or Vice-Chairperson of the Planning Commission.

## **9. ADJOURNMENT**

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Commissioner Ryane Olin motioned, seconded by Commissioner David VanCamp, to adjourn the regular meeting. All were in favor.

At 6:26 pm, Chairperson Rick Sullivan adjourned the regular meeting.

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Karlene Akesson, Secretary

# City of Castle Rock

PO Box 370  
Castle Rock, WA 98611  
(360) 274-7478



**To:** Castle Rock Planning Commission  
**From:** Kirsten Peterson, Planning Consultant  
**Date:** January 21, 2025  
**Subject:** Public Hearing on an Ordinance to amend Chapter 16.04.030 of the Castle Rock Municipal Code, to add a subdivision review exemption for large non-residential lots

## Summary:

On February 20, 2024, the City of Castle Rock entered into a Development Agreement with the owners of the Landing on the Cowlitz Master Planned Development (CT6, LLC and MLC Ventures LLC). Section 6.2.4 of the Development Agreement states that “the City agrees to consider an amendment to its code providing for exempt subdivisions allowed under RCW 58.17.040(2) for non-residential properties within an approved master plan”. In accordance with the agreement, the City is now proposing an ordinance that would amend Chapter 16.04.030 of the Castle Rock Municipal Code to allow for such an exemption.

## Background:

The City of Castle Rock regulates the subdividing of land through the provisions outlined in Title 16 Subdivisions, of the Castle Rock Municipal Code. The title has been adopted pursuant to Chapter 58.17 RCW for subdivisions, short subdivisions, boundary line adjustments and binding site plans.

Title 16 includes a section on general provisions for subdivisions and outlines the procedures that an applicant must follow to apply for a subdivision of land. This includes the description of the required pre-application meeting, a description of the documents that must be submitted with an application, as well as the requirements for notifying the public and holding public hearings at the appropriate stages.

Chapter 16.04.030 is an “applicability” section of code that describes which types of projects must adhere to the subdivision requirements. It then goes on to provide a list of five types of land divisions for which the subdivision requirements do not apply. As outlined in the existing code, these five exemptions are as follows:

- A. Cemeteries and other burial plots while used for that purpose;
- B. Divisions made by testamentary provisions or the laws of descent;
- C. Divisions of land into lots or tracts classified for industrial or commercial use when the city has approved a binding site plan which authorizes specific uses of said land in accord with Chapter [16.35](#) CRMC;
- D. A division which is made by subjecting a portion of a parcel or tract of land to Chapter [64.32](#) RCW, the Horizontal Property Regimes Act (Condominiums), if the city has approved a binding site plan for all of such land;
- E. A division made for the purpose of alteration by adjusting boundary lines, between platted or unplatted lots or both, which does not create any additional lot, tract, parcel, site, or division nor create any lot, tract, parcel, site, or division which contains insufficient area and dimension to meet minimum requirements for width and area for a building site.

These five exemptions are listed pursuant to RCW 58.17.040, which lists ten areas for which the state has indicated the subdivision requirements can be deemed not applicable by a local jurisdiction.

#### **Development Agreement:**

The Development Agreement for the Landing on the Cowlitz project includes the following provision:

6.2.4: The City agrees to consider an amendment to its code providing for exempt subdivisions allowed under RCW 58.17.040(2) for non-residential properties within an approved master plan. An exempt land division must be reviewed by the City through a consistency process outlined in Exhibit E.

In order to achieve compliance with this provision, the City is now proposing to add an additional (sixth) exemption to Chapter 16.04.030, which reads as follows:

B. Divisions of non-residential land into lots or tracts each of which is one-one hundred twenty-eighth of a section of land or larger, or five acres or larger if the land is not capable of description as a fraction of a section of land: PROVIDED, That for purposes of computing the size of any lot under this item which borders on a street or road, the lot size shall be expanded to include that area which would be bounded by the center line of the road or street and the side lot lines of the lot running perpendicular to such center line;

This proposed language is in keeping with RCW 58.17.040(2) but specifies that the large lot exemption process is specific to non-residential land only.

#### **Analysis:**

CRMC 17.77.040 outlines the submittal requirements and processing requirements for eight different permit types, with a ninth category for miscellaneous. Approval of a text amendment to

the Municipal Code is not specifically categorized by type but is considered by state law to be a legislative action requiring approval by City Council.

Text amendments to the development code are also required to comply with the environmental policy of Chapter 18.04. As such, a SEPA checklist was distributed for public comment, and a Determination of Nonsignificance was issued on January 7, 2025.

The notice for the public hearing for the Planning Commission was duly advertised on January 7, 2025, in the Longview Daily News, on the City website, and posted at the Castle Rock Public Library, Castle Rock Post Office, and Castle Rock City Hall.

The ordinance has also been transmitted to the Department of Commerce for their 60-day review. A 30-day expedited review was requested but the outcome of that request is still undetermined. At such time that the Commerce review is complete, the City Council will also conduct a public hearing that meets all noticing requirements of the CRMC and the RCW.

CRMC 17.77.050 provides criteria to be considered when reviewing development permits. This section of code states that “these criteria are objectives of good land use planning to be aimed for in development within the city”. While not all criteria are applicable to a text amendment, the first two criteria are to 1) ensure general conformance with the Comprehensive Plan elements and policies, and 2) ensure conformance with the existing zoning and subdivision regulations.

**Recommendation:**

After reviewing the criteria of the CRMC planning staff finds that the draft ordinance will achieve compliance with the Landing on the Cowlitz Development Agreement, that the ordinance is in keeping with the goals and policies of the comprehensive plan and is compliance with the RCW. As such, staff recommends approval of the attached ordinance that would allow for an exemption to the land division requirements for large non-residential lots within a master plan

If the Planning Commission should choose to follow the recommendation of staff, they could make a motion to forward a recommendation of approval to City Council for adoption of an ordinance that would amend Chapter 16.04.030 of the Castle Rock Municipal Code by adding a new subdivision review exemption which would allow the division of non-residential land into lots of 5 acres or larger

**Attachment:**

Draft Ordinance

ORDINANCE NO. 2025-XX

AN ORDINANCE OF THE CITY OF CASTLE ROCK RELATING TO THE APPLICABILITY OF LAND DIVISION WITHIN THE CITY, ALLOWING FOR AN ADDITIONAL EXEMPTION FOR DIVISIONS OF LAND INTO LOTS OF 5 ACRES OR LARGER WITHIN THE CITY, PURSUANT TO RCW 58.17.040(2); AMENDING CHAPTER 16.04.030 OF THE CASTLE ROCK MUNICIPAL CODE.

WHEREAS, the Castle Rock Municipal Code provides general provisions and regulations related to divisions of land within the City limits for the purpose of promoting the public health, safety and general welfare of the citizens of the city in accordance with the standards established by the state; and

WHEREAS, the City Council entered into a Development Agreement with CT6, LLC and MLC Ventures LLC, collective owners of the Landing on the Cowlitz Master Planned Development, on February 20, 2024; and

WHEREAS, Section 6.2.4 of the aforementioned Development Agreement states that “the City agrees to consider an amendment to its code providing for exempt subdivisions allowed under RCW 58.17.040(2) for non-residential properties within an approved master plan”; and

WHEREAS, Chapter 16.04.030 of the Castle Rock Municipal Code allows for five exemptions to the regulations relating to the divisions of land within the City, as authorized pursuant to RCW 58.17.040(2); and

WHEREAS, in accordance with the Development Agreement, the City has determined to add an additional exemption to Chapter 16.04.03 which allows for an exemption to the division of non-residential properties 5 acres or larger; and

WHEREAS, the proposed amendment to the Castle Rock City Code was issued a SEPA Determination of Non-Significance on January 7, 2025; and

WHEREAS, pursuant to RCW 36.70A.106 notice of the City’s intent to amend the Municipal Code was sent to the Washington State Department of Commerce; and

WHEREAS, the required State Department of Commerce 60-day notice was complete on \_\_\_\_\_, 2025; and

WHEREAS, after providing notice consistent with CRMC 17.72.030, the Planning Commission held a public hearing on January 21, 2025, and based on public testimony and other evidence received at said hearing, the Planning Commission recommended City Council adoption of the ordinance; and

WHEREAS, the City Council conducted a public hearing on \_\_\_\_\_, 2025, where it received and considered public comments on the proposed changes;

WHEREAS, the ordinance was read for the first time and adopted by unanimous vote of the City Council on \_\_\_\_\_, 2025.

NOW THEREFORE, the City Council of the City of Castle Rock do hereby ordain as follows:

**Section 1. The recitals set forth above are hereby adopted as the findings of the City Council and are by this reference incorporated herein as if set forth in their entirety.**

**Section 2. Chapter 16.04.030 of the Castle Rock City Code, as last amended by Ordinance 2010-01, is hereby amended to read as follows:**

Every division or redivision of land shall comply with the provisions of Chapter 58.17 RCW, this title and all future amendments or applicable federal, state or local laws. After final plat or short plat approval, any subsequent division of platted or short platted lots, parcels, tracts, sites or divisions shall be allowed only if the procedures of this title are followed, and these requirements shall be applicable to all plats approved prior to the effective date of this title. Pursuant to RCW 58.17.040, the provisions of this title shall not apply to the following:

A. Cemeteries and other burial plots while used for that purpose;

B. Divisions of non-residential land into lots or tracts each of which is one-one hundred twenty-eighth of a section of land or larger, or five acres or larger if the land is not capable of description as a fraction of a section of land: PROVIDED, That for purposes of computing the size of any lot under this item which borders on a street or road, the lot size shall be expanded to include that area which would be bounded by the center line of the road or street and the side lot lines of the lot running perpendicular to such center line;

B~~C~~. Divisions made by testamentary provisions or the laws of descent;

C~~D~~. Divisions of land into lots or tracts classified for industrial or commercial use when the city has approved a binding site plan which authorizes specific uses of said land in accord with Chapter 16.35 CRMC;

D~~E~~. A division which is made by subjecting a portion of a parcel or tract of land to Chapter 64.32 RCW, the Horizontal Property Regimes Act (Condominiums), if the city has approved a binding site plan for all of such land;

E~~F~~. A division made for the purpose of alteration by adjusting boundary lines, between platted or unplatted lots or both, which does not create any additional lot, tract, parcel, site, or division nor create any lot, tract, parcel, site, or division which contains insufficient area and dimension to meet minimum requirements for width and area for a building site. [Ord. 2010-01 Att. A, 2010; Ord. 2006-09 Att. A, 2006; Ord. 509 § 1.03, 1980].

**Section 3. Severability.** If any section, sentence, clause, or phrase of this Ordinance should be held to be invalid or unconstitutional by a court of competent jurisdiction, such invalidity or unconstitutionality shall not affect the validity or constitutionality of any other section, sentence, clause, or phrase of this Ordinance; provided, however, that if any section, sentence, clause, or phrase of this Ordinance is held to be invalid by a court of competent jurisdiction then the section, sentence, clause, or phrase in effect prior to the effective date of this Ordinance shall be in full force and effect for that invalidated section, sentence, clause, or phrase, as if this Ordinance had never been adopted.

**Section 4. Copy of Codes to be on File.** Pursuant to RCW 35A.12.140, at least one copy of each code of technical regulations adopted by reference in this Ordinance shall be filed and maintained by the City Clerk for use and examination by the public.

**Section 5. Corrections.** Upon approval of the City Attorney, the City Clerk and codifiers of this ordinance are authorized to make necessary corrections to this Ordinance including, but not limited to, the correction of scrivener/clerical errors, references, ordinance numbering, section/subsection numbers and any references thereto.

**Section 4. Effective Date.** This ordinance concerning powers vested solely in the Council, it is not subject to referendum and shall become effective five (5) days after its passage and publication as required by law.

ADOPTED by the City Council and signed by the Mayor at a regular meeting thereof on the \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
Mayor Paul Helenberg

Attest:

Approved as to form:

\_\_\_\_\_  
Carie Cuttonaro, Clerk-Treasurer

\_\_\_\_\_  
Frank Randolph, City Attorney

**PUBLIC NOTICE**  
**Notice of SEPA DNS, and Public Hearing**  
**Text Amendment to Amend Chapter 16.04.030 of the Castle Rock Municipal Code**  
**related to subdivision review exemptions**

January 7, 2025

**Proponent:** City of Castle Rock, WA

**Location:** Citywide municipal code text amendment

**Lead agency:** City of Castle Rock, WA

**Description of proposal:** The City of Castle Rock is initiating a text amendment to the Castle Rock Municipal Code to amend Chapter 16.04.030 related to the applicability of land divisions within the city. The City proposes to add a sixth exemption to the list of exemptions to the city's municipal subdivision review process, allowing project applicants to subdivide their property under specific conditions without undergoing municipal review and noticing. This additional subdivision review exemption will allow the division of land into lots of 5 acres or larger, as allowed pursuant to RCW 58.17.040(2). Please contact the City of Castle Rock to view the proposed amendment.

**Determination of Non-Significance (DNS):** The SEPA Responsible Official has determined that this proposal will not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request at: 141 "A" Street SW, Castle Rock, WA 98611

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from January 7, 2025. Written comments must be submitted by January 21, 2025, to the City of Castle Rock Agency Contact below.

**Notice of Public Hearing of the Planning Commission:**

**Date:** January 21, 2025

**Time:** 6:00 pm

**Location:** Castle Rock Senior Center 222 2nd Ave SW, Castle Rock, WA 98611

**Purpose:** To review the proposed text amendment and make a recommendation to the City Council, pursuant to Castle Rock Municipal Code 17.72

**YOU ARE INVITED** to attend and provide testimony to the Planning Commission on the above proposal. You may also attend the meeting and participate in the hearing via phone or virtually through GoToMeeting: To join this meeting from your computer, tablet, or smartphone: <https://meet.goto.com/216918261>. To join this meeting using your phone: +1 (224) 501-3412 Access Code: 216-918-261 (Press \*6 to speak) New to GoToMeeting? Get the app now and be ready: <https://meet.goto.com/install>

Written comments must be submitted by January 21, 2025. Written Comments may be submitted by mail to: The City of Castle Rock, PO Box 370, Castle Rock, WA 98611, by email, or in person by contacting the staff member listed below.

Questions: For more information on the proposal, please contact Karlene Akesson at 360-274-8181 ext. 302 or [kakesson@ci.castle-rock.wa.us](mailto:kakesson@ci.castle-rock.wa.us) or at the address listed below. Documents can be viewed at Castle Rock City Hall, 141 A St SW, Castle Rock WA 98611

**SEPA RESPONSIBLE OFFICIAL:** Kirsten Peterson, City Planner  
141 "A" Street SW

PO Box 370, Castle Rock, WA 98611  
kirsten.peterson@scjalliance.com  
360-352-1465, ext. 429

**Signature:** Kirsten Peterson, January 7, 2025

A handwritten signature in blue ink that reads "Kirsten Peterson". The signature is written in a cursive, flowing style.

You may appeal this SEPA determination pursuant to CRMC 18.04.220, an appeal of SEPA threshold determinations or SEPA actions shall be combined with any appeals of associated applications or permits. Appeals must be filed within 10 days of the decision and must be appealed to Castle Rock City Council.

# SEPA Environmental Checklist

## A. Background

**1. Name of proposed project, if applicable:**

Municipal Non-Residential Subdivision Review Exemption Ordinance for the City of Castle Rock

**2. Name of applicant:**

City of Castle Rock

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

141 A Street SW

Castle Rock, WA 98611

(360)-274-8181

Karlene Akkeson – Deputy Clerk

**4. Date checklist prepared:**

January 3, 2024

**5. Agency requesting checklist:**

City of Castle Rock Building and Planning Department

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

The ordinance will be reviewed by the Castle Rock Planning Commission in a public hearing scheduled for January 21, 2025. A public hearing will be scheduled before the City Council in February or March following the required review by the Department of Commerce.

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

No future activity related to this proposal is planned. The City of Castle Rock reviews, evaluates, and revises the municipal code as deemed necessary to address changes in state law and to address the goals and policies of the Comprehensive Plan.

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

No additional environmental information has been prepared that is directly related to this proposal

**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.**

The City is actively processing applications using the existing municipal code. This proposal would revise the municipal code.

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

This is a non-project action. No permits are required to update the City's municipal code. The revisions to the municipal code would be subject to Castle Rock Planning Commission recommendation and City Council approval.

In addition, Washington State Department of Commerce reviews the revisions to the municipal code during a 60-day review period prior to adoption.

**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 of Castle Rock is considering the adoption of an ordinance which would introduce an additional exemption to the municipal subdivision review process. The City proposes to add a sixth exemption to the list of exemptions to the city's municipal subdivision review process, allowing project applicants to subdivide their non-residential property under specific conditions without undergoing municipal review and noticing. This additional subdivision review exemption would allow the division of non-residential land into lots of 5 acres or larger, bringing the City of Castle Rock into compliance with RCW 58.17.040(2), which states that the provisions of RCW 58.17 (Plats—Subdivisions—Dedications) shall not apply to:

Divisions of land into lots or tracts each of which is one-one hundred twenty-eighth of a section of land or larger, or five acres or larger if the land is not capable of description as a fraction of a section of land, unless the governing authority of the city, town, or county in which the land is situated shall have adopted a subdivision ordinance requiring plat approval of such divisions: PROVIDED, That for purposes of computing the size of any lot under this item which borders on a street or road, the lot size shall be expanded to include that area which would be bounded by the center line of the road or street and the side lot lines of the lot running perpendicular to such center line

**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.**

Castle Rock is located in Cowlitz County, bordered on the west by the Cowlitz River. The municipal code applies to the entirety of the Castle Rock City limits, about 10 square miles.

## **B.Environmental Elements**

### **1. Earth**

**a. General description of the site:**

The City of Castle Rock is located in western Washington – 95 miles south of Seattle and 45 miles North of Vancouver. The City is at an elevation of 59 feet and is situated along the Cowlitz River, west of Mount St. Helens and the Cascade mountain range.

**Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:**

While there is a variety of terrain within the City of Castle Rock, the city is generally located on flat topography near the Cowlitz River. There are some isolated steep slopes in the east part of the city where the city limits meet the low foothills leading to Mount St. Helens.

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

A small portion of the city east of Interstate 5 reaches a slope of approximately 26%.

**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 United States Department of Agriculture Natural Resources Conservation Services publishes surveys for Washington State. The soil survey information is regularly updated. Cowlitz County soil survey data was last updated in 2015. The soil survey includes general soil map units that show broad areas that have distinctive soil patterns, relief, and drainage.

Each map unit on the general soil unit map is a unique natural landscape typically consisting of one or more major soils or miscellaneous areas and some minor soils and miscellaneous areas. Castle Rock has many different soils across the city, including: Newberg fine sandy loam, Caples silty clay loam, Carolls loamy sand, Panamaker gravelly sand, Olequa silt loam, and Kelso silt loam, among other soil types.

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

The City of Castle Rock is generally flat and has very few slopes that would qualify as steep slopes or landslide hazards.

**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.**

No filling, excavation, or grading is proposed for this non-project action. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

**f. Could erosion occur because of clearing, construction, or use? If so, generally describe.**

No clearing, construction, or other erosion-causing actions are proposed as part of this non-project proposal. Any future development on subdivided parcels resulting from this

non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

There would be no project construction as part of this non-project action. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

This non-project action would not cause erosion or other impacts to the earth, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

## **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.**

No construction, operation or maintenance is proposed as part of this non-project proposal, and therefore no emissions would result from the proposal. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

There are no off-site sources of emissions or odor that would affect this non-project proposal.

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

Not applicable. The non-project action would not produce air emissions. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

## **3. Water**

- a. Surface:**

- 1. Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If**

**yes, describe type and provide names. If appropriate, state what stream or river it flows into.**

There are several streams, creeks, and wetlands in the Castle Rock vicinity, all of which flow into the Cowlitz River, which flows through the city.

- 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.**

The non-project proposal would not include any work over, in, or adjacent to the waters described above. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

- 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.**

No fill or dredge material would be placed in or removed from surface water or wetlands as part of this non-project action. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

This non-project proposal would not require any surface water withdrawals or diversions. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

This non-project action covers the entire City of Castle Rock and would not include any development within floodplain areas. According to the NFIP FIRM maps, portions of Castle Rock lie within the 100-year floodplain. Future development on subdivided parcels resulting from this non-project action could be located within the 100-year floodplain, but would have to comply with the Castle Rock Municipal Code (including the City's floodplain ordinance) and would be subject to SEPA review if applicable.

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

This non-project proposal does not involve any discharges of waste materials to surface waters. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

**b. Ground:**

- 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 a general description, purpose, and approximate quantities if known.**

This non-project action would not include any withdrawal of groundwater. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

- 2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (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 water or waste material would be discharged into the ground as part of this non-project proposal. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

**c. Water Runoff (including stormwater):**

- 1. Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

This non-project action would not impact water runoff. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

No waste materials would enter ground or surface waters as part of this non-project action. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

The proposed non-project action would not alter drainage patterns. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

The proposed non-project action would not impact surface, ground, or runoff water, so no mitigation measures are proposed. Any future development on subdivided parcels

resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

## 4. Plants

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

- ☒ **deciduous tree:** alder, maple, aspen, other
- ☒ **evergreen tree:** fir, cedar, pine, other
- ☒ **shrubs**
- ☒ **grass**
- ☒ **pasture**
- ☒ **crop or grain**
- ☒ **orchards, vineyards, or other permanent crops.**
- ☒ **wet soil plants:** cattail, buttercup, bullrush, skunk cabbage, other
- ☒ **water plants:** water lily, eelgrass, milfoil, other
- ☒ **other types of vegetation**

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

No vegetation would be removed as a direct result of this proposal to revise the Castle Rock Municipal Code. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

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

The Washington Department of Natural Resources' Natural Heritage Program dataset does not identify any rare plants or ecosystems within the City of Castle Rock. Threatened and endangered species are protected through the Fish and Wildlife Habitat Conservation Areas regulations located with the City's critical areas regulations.

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

No landscaping is proposed as part of this non-project action. Landscaping associated with future project specific development would be subject to review for consistency with applicable provisions of Castle Rock Municipal Code.

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

The Cowlitz County Noxious Weed Control Board keeps information on noxious weeds in Cowlitz County. According to the Weed Control Board, the top ten most common noxious weeds in Castle Rock are: Common Crupina, Common Cordgrass, Dyer's Woad, Eggleaf Spurge, False Brome, Floating Primrose-Willow, Flowering Rush, French Broom, Garlic Mustard, and Giant Hogweed.

## 5. Animals

- a. **List any birds and other animals that 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:

A variety of birds and animals are known to be in the City of Castle Rock, particularly those animals typically found in urban areas. The Cowlitz River and other streams in the city are habitat for various fish species, including salmon and trout. Wild species inhabiting natural areas of Cowlitz County (such as bears or cougars) may occasionally be sighted in Castle Rock or its immediate vicinity.

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

The Washington Department of Fish and Wildlife's Priority Habitat and Species shows occurrence of Coho salmon (*Oncorhynchus kisutch*), rainbow trout and winter summer steelhead (*Oncorhynchus mykiss*), Chinook salmon (*Oncorhynchus tshawytscha*), and cutthroat trout (*Oncorhynchus clarki*) in Castle Rock. The PHS data also shows areas of aquatic wetland habitat and habitat for wintering waterfowl in the city.

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

The project area is located within the Pacific Flyway, which is a flight corridor for migrating waterfowl. The Pacific Flyway extends from Alaska to South America. The proposed action would not interfere with the Pacific Flyway.

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

The city protects Fish and Wildlife Habitat Conservation Areas through the implementation of the City's critical areas regulations. No changes are proposed to these regulations. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

Invasive animal species likely to be in the area include rodents and raccoons that are typically found in urban areas. The proposed non-project action would not disturb these species.

## 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 proposed non-project action would not require energy. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

As a non-project action, the proposal would not impact the use of solar energy at any specific location. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

- 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.**

The proposed non-project action does not include any energy conservation measures. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

## **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 because of this proposal? If so, describe.**

As a non-project action, the proposal would not cause environmental health hazards. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

This non-project action covers the entire City of Castle Rock, not a specific site. The Washington Department of Ecology Contaminated Sites List identifies four contaminated sites in the city.

- 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.**

No hazardous chemicals or conditions would affect this non-project action. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

- 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.**

No toxic or hazardous chemicals would be stored, used, or produced as part of this non-project action. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

No special emergency services would be required for this non-project action.

**5. Proposed measures to reduce or control environmental health hazards, if any.**

This non-project action to amend the City of Castle Rock's code would not cause any environmental health hazards, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

**b. Noise**

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

Noises in Castle Rock are typical for an urban area, including traffic noise and noises from industrial and commercial land uses. Interstate 5, which runs through a portion of the city, is one of the major noise sources.

**2. What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?**

This non-project action would not generate any noise. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

This non-project action would not cause any noise impacts, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

**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.**

This non-project action applies to the City of Castle Rock as a whole, which contains a variety of land uses across the city. Implementation of the proposed non-project action would not affect any land uses. However, the action would add an additional exemption to the city's municipal subdivision review process allowing applicants to subdivide non-residential land into lots of 5 acres or larger without undergoing municipal review and noticing. Therefore, the action has the potential to increase subdivisions in the city in

the future, and subdivided parcels could be developed, potentially changing their land use.

- 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 because of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

The City of Castle Rock does not have agricultural or forest land of long-term commercial significance in city limits.

- 1. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

This non-project action would not affect or be affected by working farm or forest lands. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

This non-project action would apply to the entire City of Castle Rock, not to a specific site or sites.

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

No structures would be demolished as part of this non-project action.

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

Any future development on subdivided parcels resulting from this non-project action would be subject to the City of Castle Rock's zoning code. The City provides multiple zoning designations, including:

- Low Density Residential
- High Density Residential
- Highway Business
- Retail Business
- Mixed use Commercial/Industrial
- Industrial
- Parks, Recreation and Open Space

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

The City's current comprehensive plan designations include:

- Low Density Residential
- High Density Residential

- Downtown commercial
- Commercial
- Heavy commercial/ light manufacturing
- Industrial
- Open space/recreation
- Public/quasi-public

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

The City has four shoreline master program designations: High-Intensity Environment, Residential Environment, Aquatic Environment, and Recreation Environment.

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

The City of Castle Rock has designated portions of the city as critical areas. This non-project action would not impact any critical areas. Any future development on subdivided parcels resulting from this non-project action would be subject to the City's Critical Areas Ordinance.

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

This non-project action would not involve construction of any structure that people would reside or work in. The current population of the City of Castle Rock is 2,465 (Office of Financial Management, 2024).

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

No people would be displaced by this non-project action.

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

The action would not cause any displacement, so no mitigation measures are proposed.

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

The proposed non-project action would bring Castle Rock's regulations into compliance with RCW 58.17.040(2). Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and Comprehensive Plan.

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

The City of Castle Rock does not contain any designated agricultural or forest lands of long-term commercial significance.

## 9. Housing

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

No housing units would be provided by this non-project action. Additionally, the subdivision exemption would be applicable only to non-residential properties.

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

No housing units would be eliminated.

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

No housing impacts are anticipated so no mitigation measures are proposed.

## 10. Aesthetics

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

This non-project action does not involve construction of any structures. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

This non-project action would not alter or obstruct any views. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

The proposed non-project action would not cause any aesthetic impacts, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

## 11. Light and glare

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

This non-project action would not produce any light or glare. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

- c. This non-project action would not produce any light or glare. The new subdivision exemption could lead to new construction on 5 acre or larger lots in the future, but all construction would be required to comply with city requirements regulating outdoor

lighting (CRMC 17.48.090). **What existing off-site sources of light or glare may affect your proposal?**

No off-site sources of light or glare would affect the proposed non-project action.

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

This non-project action would not impact light or glare so no mitigation measures are proposed. Any future development that occurs due to the subdivision exemption would be subject the City's requirements regulating outdoor lighting (CRMC 17.48.090).

## **12. Recreation**

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

The City of Castle Rock maintains nine parks.

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

No existing recreational uses would be displaced.

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

This non-project action would not impact any recreational uses, so no mitigation measures are proposed.

## **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? If so, specifically describe.**

According to the Washington Department of Archaeology and Historic Preservation's Washington Information System for Architectural and Archeological Records Data (WISAARD) database, there are no buildings, structures, or sites on historic registers within the City of Castle Rock. The WISAARD database does identify that many structures of historic age have been inventoried for eligibility for historic registers. Many were found ineligible or no determination was made, but several structures were found eligible.

**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 Department of Archaeology and Historic Preservation's predictive model maps the entirety of Castle Rock as very high risk for archaeological resources, and surveys are highly advised. The proposed non-project action would not include any ground disturbing activities, so impacts to archaeological resources are not anticipated.

**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.

Information in the WISAARD database was reviewed to assess potential impacts to cultural and historic resources.

- d. **Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

This non-project action would not impact historic or cultural resources, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

## 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 roadway network in the City of Castle Rock includes Interstate 5; arterials (including Mt St Helens Way NE, Huntington Ave N, and A St SW); collectors (including Huntington Ave S, Dougherty Dr, and Cowlitz St E), and neighborhood roads.

- 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?**

Castle Rock has limited public transit provided by the Twin Transit system, which has a stop at the Castle Rock Park and Ride adjacent to I-5.

- c. **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 non-project action would not require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities.

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

The BNSF Railway runs through the City of Castle Rock, roughly parallel and to the west of Interstate 5. This non-project action would not impact the BNSF Railway or other forms of transportation in the city.

- e. **How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?**

This non-project action would not generate any vehicular trips. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

- f. **Will the proposal interfere with, affect, or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

The proposed project would not affect or be affected by the movement of agricultural or forest products.

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

No transportation impacts are anticipated, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

## 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.**

This non-project actions would not increase the need for public services.

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

This non-project action would not impact public services, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

## 16. Utilities

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

Utilities currently available within the incorporated city limits include electricity, natural gas, water, refuse service, telephone, sanitary sewer, cable television, and others.

- 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.**

The proposed non-project action would not require any utilities. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

## 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.

X Kirsten Peterson

**Type name of signee:** Kirsten Peterson

**Position and agency/organization:** Consultant Planner

**Date submitted:**

## **D. Supplemental sheet for nonproject actions**

**Do not** use this section for project actions.

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

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

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

The proposed revisions to the Castle Rock Municipal Code would not increase discharge to water, emissions to air, production, storage, or release of toxic or hazardous substances or production of noise. In the future, parcels could be subdivided without municipal review under the new proposed exemption. Eventually, development could occur on the subdivided parcels, and that development could increase discharges, emissions, or noise. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

- **Proposed measures to avoid or reduce such increases are:**

The proposed non-project action would not cause any increases, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

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

The proposed revisions to the Castle Rock Municipal Code would not affect plants, animals, fish, or marine life. In the future, parcels could be subdivided without municipal

review under the new proposed exemption. Eventually, development could occur on the subdivided parcels, and that development would have the potential to affect plants and animals. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

The proposed non-project action would not impact plants or animals, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

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

The proposed revisions to the Castle Rock Municipal Code would not deplete energy or natural resources. In the future, parcels could be subdivided without municipal review under the new proposed exemption. Eventually, development could occur on the subdivided parcels, and that development would likely use energy and could have the potential to deplete natural resources. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

The proposed non-project action would not impact energy or natural resources, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

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

The proposed revisions to the Castle Rock Municipal Code would not affect environmentally sensitive areas or areas designated for governmental protection. In the future, parcels could be subdivided without municipal review under the new proposed exemption. Eventually, development could occur on the subdivided parcels, and that development could in some cases affect environmentally sensitive areas or other areas designated for governmental protection. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

The proposed non-project action would not impact environmentally critical areas or other areas designated for governmental protection, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

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

The proposed revisions to the Castle Rock Municipal Code would change land use regulations by adding exemption to the city's municipal subdivision review process allowing applicants to subdivide non-residential land into lots of 5 acres or larger without undergoing municipal review and noticing, consistent with RCW 58.17.040(2). Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code, zoning designations, and Shoreline Master Program.

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

The proposed non-project action would not impact land or shoreline use, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

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

The proposed revisions to the Castle Rock Municipal Code would not increase demands on transportation or public services and utilities. In the future, non-residential parcels could be subdivided without municipal review under the new proposed exemption. Eventually, development could occur on the subdivided parcels, and that could increase demands on transportation or public services and utilities. Any future development on subdivided parcels resulting from this non-project action would have to comply with the Castle Rock Municipal Code and would be subject to SEPA review if applicable.

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

The proposed non-project action would not impact transportation or public services and utilities, so no mitigation measures are proposed. Any future development on subdivided parcels resulting from this non-project action would be subject to individual review and measures to reduce or control impacts would be identified at that time if necessary.

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

The proposed revisions to the Castle Rock Municipal Code would be consistent with local, state, and federal laws for the protection of the environment. The proposed subdivision review exemption brings the City of Castle Rock into compliance with RCW 58.17.040(2).



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
Southwest Region 5 • 5525 South 11<sup>th</sup> Street, Ridgefield, WA 98642  
Telephone: (360) 696-6211

January 21, 2025

Ms. Kirsten Peterson  
City Planner  
141 "A" Street SW  
Post Office Box 370  
Castle Rock, WA 98611

**Re: Text Amendment to Amend Chapter 16.04.030 of the Castle Rock Municipal Code**

Dear Ms. Peterson:

The Washington Department of Fish and Wildlife (WDFW) appreciates the opportunity to comment on the **City of Castle Rock's proposed text amendment to Chapter 16.04.030 regarding the applicability of land divisions within the city**. We acknowledge the city's intent to introduce a sixth exemption to the municipal subdivision review process, allowing property subdividers to divide land into lots of 5 acres or larger under certain conditions without undergoing municipal review or noticing, as allowed pursuant to RCW 58.17.040(2).

While we understand the desire to streamline the development process, WDFW remains concerned about the potential environmental impacts of subdivisions that bypass municipal review, especially in critical areas. **We urge the city to ensure that land division processes account for critical areas before approving any subdivision.** Our concern is that subdivisions could be placed in direct conflict with steep slopes, floodplains, and other critical areas. This could leave newly created lots heavily encumbered by critical areas, reducing usable development space, potentially allowing encroachment into these zones. In such cases, reasonable use provisions may be the only viable option, preventing the guaranteed avoidance of these critical areas, further jeopardizing them.

To avoid potential negative impacts to critical areas, WDFW recommends future subdivisions continue to follow the guidelines of *Castle Rock's Critical Areas Ordinance (CAO) Chapter 18.10, specifically Section 18.10.080*, which requires a *Request for Determination of Critical Areas* to be applied to subdivisions. This environmental review is essential to protect these areas and ensure development regulations do not allow a net loss of the functions and values of the ecosystem per WAC 365-196-830 (4), which emphasizes avoidance as the most effective way to protect critical areas.

Lastly, the city could promote conservation easements and flexible zoning provisions, such as transferring development rights from critical areas to less environmentally sensitive portions of the property. Incorporating these strategies and potentially clustering future development to preserve large, uninterrupted tracts of critical areas, will help balance growth objectives with environmental stewardship. By addressing critical areas early in the land division process, Castle Rock can ensure responsible development while maintaining their integrity.

Again, we thank you for the opportunity to provide input. Please contact me should you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Brittney Salter", written over a light gray rectangular background.

Brittney Salter  
WDFW Region 5 Land Use Planning Lead

cc: George Fornes, WDFW Region 5 Habitat Biologist  
cc: Jessica McConnell, WDFW Region 5 Assistant Habitat Program Manager