




DATE: November 22, 2023

SUBJECT: 2024 Regional Transportation Plan for Clark County – Determination of Non-Significance

COMMENT DEADLINE: December 15, 2023

AGENCY CONTACT: Matt Ransom, AICP; Executive Director 

Attached is a SEPA threshold determination (Determination of Non-Significance) and related environmental checklist issued pursuant to the State Environmental Policy Act (SEPA) Rules (Chapter 197-11, Washington Administrative Code) for the **2024 Regional Transportation Plan for Clark County**.

Please forward any comments to Judith Perez Keniston, AICP, at Southwest Washington Regional Transportation Council, PO BOX 1366, Vancouver WA 98666-1366 or by email info@rtc.wa.gov. For questions please call 564-397-5231. Comments on the DNS must be received by 5:00 P.M. on December 15, 2023.

SEPA Checklist Distribution

Via SEPA Register

- Department of Ecology

Via email

Federal Agencies:

- Bonneville Power Administration
- Federal Highway Administration - WA
- Federal Transit Administration
- US Army Corps of Engineers
- US Fish & Wildlife US Fish & Wildlife
- US Forest Service

Native American Interest:

- Chinook Indian Nation
- Confederated Tribes of Grand Ronde
- Confederated Tribes of Warm Springs
- Cowlitz Indian Tribe
- The Confederate Tribes & Bands of the Yakama Nation

State Agencies:

- Department of Commerce
- Department of Fish & Wildlife
- Department of Natural Resources
- WA Office of Archaeology & Historic Preservation
- Office of Minority and Women's Business Enterprises (OMWBE)
- WSDOT, SW Region
- WSDOT, HQ

Regional Agencies:

- C-TRAN
- Cowlitz Wahkiakum COG/Southwest RTPO
- SW Clean Air Agency

Local Jurisdictions:

- Clark County Community Planning
- Clark County, PW/Transportation
- Clark County, Public Health
- City of Battle Ground
- City of Camas
- City of La Center
- City of Ridgefield
- City of Vancouver
- City of Washougal
- City of Woodland

Special Purpose Agencies:

- Clark County Public Utilities
- Clark Regional Wastewater District
- Col. River Economic Dev. Council (CREDC)
- Port of Camas-Washougal
- Port of Ridgefield
- Port of Vancouver

Libraries:

Media:

- The Camas-Washougal Post Record
- The Columbian
- The Reflector

Other Interested Parties:

- BIA of Clark County (Building Industry Assn.)
- Clark County Association of Realtors
- Friends of Clark County
- Neighborhood Associations Council of Clark County
- City of Vancouver Neighborhood Associations
- Vancouver Neighborhood Traffic Safety Alliance
- Fort Vancouver Regional Library



STATE ENVIRONMENTAL POLICY ACT DETERMINATION OF NON-SIGNIFICANCE

DATE OF ISSUANCE: November 22, 2023
**LEAD AGENCY/
PROPONENT:** Southwest Washington Regional Transportation Council (RTC)
COMMENT DEADLINE: December 15, 2023
AGENCY CONTACT: Judith Perez Keniston, AICP
564-397-5231
Judith.Perez@rtc.wa.gov

DESCRIPTION OF PROPOSAL: The 2024 Regional Transportation Plan (RTP) for Clark County is the foundational document for transportation infrastructure, policy, and planning in Clark County. It identifies future regional transportation system needs and outlines transportation plans and improvements necessary to preserve mobility within and throughout the region, as well as access to land uses within the region. The RTP is the long-range, multimodal plan for the Clark County region.

LOCATION OF PROPOSAL: Clark County, Washington

The Lead Agency 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 RCW43.21C.030(2)(c). This decision was made after review of the attached Environmental Checklist and the proposed 2024 Regional Transportation Plan for Clark County available [here](#).

This DNS determination is based on the finding that this is a proposed non-project action. Mitigation measures will be considered as each of the transportation projects is considered for development and implementation by transportation agencies and local jurisdictions.

This DNS is issued under WAC 197-11-340(2), and the comment period will end at 5:00 p.m. on December 15, 2023.

Responsible Official: Matt Ransom, RTC Executive Director
Address: RTC, 1300 Franklin Street, Suite 185, Vancouver WA 98660 or
PO Box 1366, Vancouver WA 98666-1366
Phone: (564) 397-5208 E-mail: Matt.Ransom@rtc.wa.gov
Signature:


Matt Ransom (Nov 21, 2023 15:42 PST)

Date: Matt Ransom, RTC Executive Director
11/22/2023

Purpose of checklist

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants

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

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

Instructions for lead agencies

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

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.

¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance>

A. Background

[Find help answering background questions](#)²

1. Name of proposed project, if applicable:

Regional Transportation Plan for Clark County, 2024 Update (hereafter referred to as the RTP)

2. Name of applicant:

Southwest Washington Regional Transportation Council (RTC)

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

Address: 1300 Franklin Street, Suite 185, P.O. Box 1366, Vancouver, WA 98666-1366

Phone: 564.397.5231

Email: info@rtc.wa.gov

Contact: Judith R. Perez Keniston, AICP, Principal Planner

4. Date checklist prepared:

November 22, 2023

5. Agency requesting checklist:

Southwest Washington Regional Transportation Council (RTC)

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

The RTP (2024 update) is scheduled for adoption by the RTC Board at the February 6, 2024 Board meeting.

Should the RTP require a fuller environmental review under the requirements of the State Environmental Policy Act, in the form of an Environmental Impact Statement (EIS), the RTC Board will release the RTP for such review at the February 6, 2024 Board meeting.

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

Yes. Updates to the RTP are required by the federal government at least every 5 years.

Review is required under the State's Growth Management Act every 2 years. The status of

² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-A-Background>

the RTP is reviewed annually at meetings of the RTC Board of Directors, which are open to the public.

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

Given the Clark County region's air quality attainment status for both ozone and carbon monoxide, the region is no longer required to carry out regional air quality conformity analysis. The RTP includes documentation of the current status of the region's air quality in Appendixes I and J of the RTP.

In regard to other environmental factors, the RTP is a plan to meet transportation needs to support land uses and development outlined in the Clark County Comprehensive Growth Management Plan. RTC relies on information in the "Final Environmental Impact Statement for the Comprehensive Growth Management Plans of Clark County, Battle Ground, Camas, La Center, Ridgefield, Vancouver, Washougal, Yacolt" (released on April 27, 2016). RTC also relies on environmental reviews and information related to current plans and transportation projects of the state, transit agencies, and other local agencies.

Further environmental review and analysis will occur during implementation of the RTP as transportation projects identified in the RTP are developed. This will include SEPA checklist preparation and, where appropriate, development of Environmental Impact Statements.

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.

Not applicable. The RTP is a policy plan covering Clark County, Washington, as a whole. It is not site-specific.

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

The RTP will be adopted by the RTC Board of Directors.

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 RTP is the principal transportation planning document for Clark County, covering a 20-year planning horizon. The RTP identifies transportation needs and strategies to develop a balanced regional transportation system to meet the transportation needs of people, freight, and goods. The plan addresses all transportation modes. Regional transportation needs must be identified in the RTP before they can be programmed for federal funding in the

Transportation Improvement Program. The proposal is to adopt an update to the RTP for Clark County last adopted in March 2019.

- 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 regional transportation system for the entire county of Clark in the state of Washington.

B. Environmental Elements

1. Earth

[Find help answering earth questions](#)³

a. General description of the site:

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

The proposal is not site-specific; therefore, the question is not applicable.

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

The proposal is not site-specific; therefore, the question is not applicable.

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 USDA Soil Conservation Service (SDS) has classified soils in Clark County into the following major soil associations:

³ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-earth>

Soil Type	Locations
<i>Sauvie-Puyallup</i>	<i>Bottomlands and floodplains</i>
<i>Hillsboro-Gee-Odne Hillsboro-Dollar-Cove Lauren-Sifton-Wind River</i>	<i>Terraces</i>
<i>Hesson-Olequa Hesson-Olympic</i>	<i>Uplands</i>
<i>Cinebar-Yacolt Olympic-Kinney</i>	<i>Foothills</i>

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

The proposal is not site-specific. However, within Clark County there are mapped areas of potential instability due to underlying geologic conditions and physical characteristics associated with steepness along waterways. Detailed designs for new transportation projects will include appropriate measures to ensure stability.

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 proposal is not site-specific; therefore, no filling or grading will be required as a result of this action, which is adoption of the RTP. Specific projects will address the source and location of any necessary filling or grading and appropriate permits secured before construction begins.

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

The proposal is not site-specific; however, erosion could occur as a result of clearing or construction of specific transportation projects. Proper erosion control measures should be identified and implemented during project design and construction phases. These measures will be addressed through environmental review of specific projects by the appropriate local jurisdictions.

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

The proposal is not site-specific; however, erosion could occur as a result of clearing or construction of specific transportation projects. Proper erosion control measures should be identified and implemented during project design and construction phases. These measures will be addressed through environmental review of specific projects by the appropriate local jurisdictions.

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

Not applicable.

2. Air

[Find help answering air questions](#)⁴

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.

The RTP for Clark County, 2024 update is not site-specific; and the Vancouver Air Quality Maintenance Area is now in attainment status for both ozone and carbon monoxide.

The air quality status within the region's Air Quality Maintenance Area is described below:

Ozone: Under both the 1997 and 2008 8-hour ozone NAAQS, the Vancouver/Portland Air Quality Maintenance Area (AQMA) is designated in attainment status. As of the revocation of the 1-hour ozone NAAQS on June 15, 2005, regional emissions analyses for ozone precursors in the Plan (RTP) and Program (TIP) were not required.

Carbon Monoxide: The Vancouver AQMA was redesignated to attainment for the CO NAAQS, with an approved 10-year maintenance plan in 1996. In January 2007, the Southwest Clean Air Agency submitted a Limited Maintenance Plan (LMP) for CO to the Environmental Protection Agency for the second 10-year period. The EPA approved this LMP the following year. Based on the population growth assumptions contained in the Vancouver Limited Maintenance Plan (LMP) and the LMP's technical analysis of emissions from the on-road transportation sector, it was concluded that the area would continue to maintain CO standards. As of October 21, 2016, the Vancouver AQMA successfully completed the 20-year "maintenance" period and is no longer required to make a conformity determination.

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

No.

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

Mobile source emissions can be reduced through increased use of nonmotorized transportation modes, through reliance on transit rather than single occupant motor vehicles, through use of vehicles with reduced emissions, through transportation systems management measures (such as interconnecting traffic signals and enhanced timing of signals) and travel demand management techniques (such as flexible work hours, parking charges, carpooling and vanpooling programs). All of these strategies are supported by the RTP. Mobile emissions

⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-Air>

can also be reduced through technology-based transportation command and control measures, such as enhanced emissions testing (I/M) programs and expansion of I/M requirements. These strategy types are called transportation control measures.

Transportation strategies implemented in attaining National Ambient Air Quality Standards (NAAQS) in the region have included expanded transit service and an emissions testing (I/M) program for areas of Clark County.

3. Water

[Find help answering water questions](#)⁵

a. Surface:

[Find help answering surface water questions](#)⁶

- 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.**

This question is not applicable to the non-project action to adopt the RTP.

Regionwide, Clark County is bounded by the Columbia River to the south and west and to the north by the North Fork Lewis River. Other major bodies of water within the county include Vancouver Lake, Lacamas Lake, Battle Ground Lake, Lake Merwin, Yale Lake, Salmon Creek, East Fork Lewis River, Lacamas Creek, Washougal River, Burnt Bridge Creek, Gibbons Creek, Allen Creek, Cedar Creek, and Lake River. An inventory of water bodies was part of Clark County's Growth Management Act (GMA) planning process.

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

This proposal is not project-specific; however, design of specific transportation projects would be subject to mitigation measures through future SEPA, Shoreline, and interdepartmental review, as applicable.

⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water>

⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Surface-water>

- 3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.**

This proposal is not project-specific. In plan implementation, specific transportation projects will address the source and location of any necessary filling or dredging; and appropriate permits will be secured before construction begins.

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

This proposal is not project-specific. Individual transportation construction projects may require surface water diversions and/or culvert construction. Detailed engineering plans will be prepared at the time of project site-specific planning and design.

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

Clark County has many acres that lie within 100-year floodplains. Detailed locations should be identified when specific projects are being designed. Where project development might cause floodplain impacts, all federal, state and local floodplain provisions will be met.

- 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.**

The proposal is not site-specific. During plan implementation, stormwater quality and quantity is an issue in most transportation improvement projects due to pavement construction. Mitigation measures are to be identified as part of specific project designs. Stormwater runoff shall be treated in biofiltration swales or other approved treatment facilities prior to discharge to surface waters.

b. Ground:

[Find help answering ground water questions](#)⁷

- 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.**

Not applicable for this nonsite-specific action, which is the proposed adoption of the RTP for Clark County.

- 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.**

Not applicable for this nonsite-specific action, which is the proposed adoption of the RTP for Clark County.

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 proposal is not site-specific. However, surface water will be generated from impervious surfaces of transportation projects as they are constructed as part of plan implementation. Projects will need to meet federal, state, and local standards for stormwater collection and treatment. These issues should be addressed during design of specific transportation projects.

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

Not as a result of this action. Future project construction may result in waste materials from the surface of transportation projects (i.e. oils, anti-freeze, tire rubber) may enter ground or surface waters. These materials should be identified and addressed during the design of specific projects.

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

⁷ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-3-Water/Environmental-elements-Groundwater>

The RTP for Clark County adoption proposal is not site-specific.

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

Not applicable for this nonsite-specific action, which is the proposed adoption of the RTP for Clark County.

4. Plants

[Find help answering plants questions](#)

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**

Not applicable. Proposed adoption of the RTP for Clark County is not site-specific.

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

The proposal to adopt the RTP is not site-specific. Plan implementation, however, will likely require removal of some trees, shrubs, or grasses for construction of transportation projects listed in the RTP. This will be addressed in a project-specific SEPA checklist by the responsible jurisdiction during the design and permitting phases of the transportation project as part of project review.

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

Not applicable for this nonproject action. According to the U.S. Fish and Wildlife Service, several threatened or endangered species are believed to occur in Clark County. Bradshaw's Desert-Parsley is an endangered species, and water howellia is a threatened species.

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

Mitigation measures will be addressed when specific transportation projects are being implemented, with special consideration given to the enhancement of natural shoreline ecosystems, wetlands, archaeological protection, and wildlife enhancement, as appropriate. State and federal agencies will be consulted to identify and protect threatened and/or endangered species.

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

Not applicable for this nonproject action.

5. Animals

[Find help answering animal questions](#)⁸

- 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:**

Not applicable. Proposed adoption of the RTP for Clark County is not site-specific.

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

Not applicable. Proposed adoption of the RTP for Clark County is not site-specific.

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

Not applicable. Proposed adoption of the RTP for Clark County is a nonproject action and is not site-specific. The Columbia River corridor is part of the migration route for salmon, Canada geese, and other waterfowl. Also, the Lewis and Washougal rivers have migrating salmon, steelhead, and sea-run cutthroat trout.

⁸ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals>

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

This proposal is not project-specific. However, wildlife mitigation measures, to be addressed at transportation project level, will likely include changing alignments, as necessary, to avoid sensitive wildlife areas; landscaping with native trees, plants, and shrubs that provide habitat and food sources for wildlife; and consultation with state and federal agencies to identify and protect threatened and/or endangered species.

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

Not applicable. Proposed adoption of the RTP for Clark County is not site-specific.

6. Energy and natural resources

[Find help answering energy and natural resource questions](#)⁹

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.

No energy resources will be used as a result of the proposed action. Future construction of transportation projects will require use of petroleum products.

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

Not applicable for this nonsite-specific action, which is the proposed adoption of the RTP for Clark County.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.

This is a nonproject action. However, energy conservation is addressed in the RTP with support for programs such as Commute Trip Reduction, transit development, and nonmotorized modes.

⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-6-Energy-natural-resou>

7. Environmental health

[Health Find help with answering environmental health questions](#)¹⁰

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

None that could occur as a result of this proposed adoption of RTP.
 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.**

Not applicable for this nonsite-specific action, which is the proposed adoption of the RTP for Clark County.
 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.**

Not applicable because adoption of the RTP is a nonproject, nonsite-specific action.
 4. **Describe special emergency services that might be required.**

The RTP does recognize the need to transport hazardous materials on the regional transportation system. Clark County has in place an emergency response system to deal with any emergencies resulting from the transportation of hazardous materials.
 5. **Proposed measures to reduce or control environmental health hazards, if any.**

None.
- b. **Noise**
 1. **What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?**

The proposed adoption of the RTP is a nonproject action and will cause no noise impacts.
 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)?**

¹⁰ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-7-Environmental-health>

As the RTP is implemented, future transportation project construction will result in construction noise (equipment operation). Once construction is complete, traffic noise is possible, though is not anticipated to be above acceptable levels.

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

Does not apply to this nonproject action, which is not site-specific. When projects identified in the RTP are implemented, measures to reduce or control noise will be addressed, if applicable, by the responsible jurisdiction as part of the design and permitting phases of the project.

8. Land and shoreline use

[Find help answering land and shoreline use questions](#)¹¹

- 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 proposal is not site-specific.

- 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?**

This proposal is not site-specific.

- 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 proposal is not site-specific.

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

This proposal is not site-specific.

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

Not as a result of the proposed adoption of the RTP.

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

This proposal is not site-specific.

¹¹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use>

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

The proposal is not site-specific. However, comprehensive plan designations are addressed in the metropolitan transportation planning process and in development of the RTP. The RTP addresses the existing and future need for accessibility to developments throughout the county and mobility between developments. The comprehensive plan is used to determine where future development is likely to occur.

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

Not applicable because proposed adoption of the RTP is not site-specific.

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

This proposal is not site-specific. However, “environmentally sensitive” areas of Clark County are identified as part of the local jurisdictions’ growth management (GMA) planning.

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

Not applicable because proposed adoption of the RTP is not project-specific

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

This proposal is not site-specific. However, right-of-way acquisition often precedes construction of transportation projects that may involve relocating current residents. All available and reasonable alternatives will be used to minimize relocations resulting from project construction.

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

Not applicable for this proposal, which is the proposed adoption of the RTP for Clark County.

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

The State Growth Management Act (GMA) requires consistency between the RTP and the comprehensive plans for the region. State planning standards and guidelines for development of the RTP require that the linkages between land use and transportation are considered.

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

This proposal is not site-specific. The local comprehensive planning process addresses agricultural and forest lands, with the RTP supporting the local Comprehensive Plans.

9. Housing

[Find help answering housing questions](#)¹²

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

Not applicable for this proposal.

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

Not applicable for this proposal. Eventual implementation of the RTP, through construction of transportation projects identified in the RTP, may result in right-of-way acquisition, which may involve relocating current residents; but this will be addressed by the responsible jurisdiction at the project level.

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

During project construction resulting from the RTP, every effort will be made by the involved jurisdictions to avoid impacts to existing or future residences. Specific measures will be addressed as part of the environmental review for individual projects.

10. Aesthetics

[Find help answering aesthetics questions](#)¹³

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

Does not apply for this nonproject action. The RTP is not site-specific, and the approval of the Plan does not propose construction of structures. For projects identified in the RTP, structure height and exterior building materials, if applicable, will be addressed by the local jurisdiction at the project design phase in the project-specific SEPA checklist.

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

¹² <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing>

¹³ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics>

Does not apply for this nonproject action. The RTP is not site-specific, and the approval of the Plan does not propose construction of structures. For projects identified in the RTP, structure height and exterior building materials, if applicable, will be addressed by the local jurisdiction at the project design phase in the project-specific SEPA checklist.

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

Does not apply for this nonproject action. The RTP is not site-specific, and the approval of the Plan does not propose construction of structures. For projects identified in the RTP, structure height and exterior building materials, if applicable, will be addressed by the local jurisdiction at the project design phase in the project-specific SEPA checklist.

11. Light and glare

[Find help answering light and glare questions](#)¹⁴

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

Transportation projects could result in light or glare produced by vehicle headlights during nondaylight hours

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

Potential hazards should be addressed as part of the environmental review for specific projects.

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

Not applicable to this nonproject-specific action, which is the proposed adoption of the RTP for Clark County.

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

Lighting impacts will be addressed at the time of site-specific planning.

¹⁴ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-11-Light-glare>

12. Recreation

[Find help answering recreation questions](#)

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

Does not apply to this nonproject action. Clark County has a variety of recreational opportunities, including sports facilities, neighborhood, community and regional parks, open space, and wildlife habitat areas.

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

Does not apply to this nonproject action. Several RTP-proposed projects funded by federal transportation funds will enhance the transportation system for recreational users by providing bicycling and walking facilities along roads and trails.

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

Several RTP-proposed projects will enhance the transportation system for recreational users by providing bicycling and walking facilities along roads and trails.

13. Historic and cultural preservation

[Find help answering historic and cultural preservation questions](#)¹⁵

- 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.**

The Cultural Resources Inventory for Clark County identifies numerous archaeological sites in part resulting from countywide Native American activity. Historic preservation officials emphasize that artifacts are probably not confined to those identified sites. Further investigation relating to historic and preservation should occur when projects are in their design stage.

- 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 Resources Inventory of Clark County lists numerous sites of historic importance within Clark County.

¹⁵ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p>

- 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.**

The proposed RTP adoption is not site-specific, but RTC does rely on Clark County's GIS Digital Atlas for data and information and consults with local tribes as part of the transportation planning process.

- 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.**

Mitigation measures are to be identified and implemented on a site-specific basis as the RTP is being implemented with project development.

14. Transportation

[Find help with answering transportation questions](#)¹⁶

- 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 proposed adoption of the RTP is not site-specific; however, the RTP primarily relates to the designated regional transportation system, which includes all state routes and facilities and principal arterials. Roads functionally classified under the federal functional classification system as collectors or above in the urban area are eligible for federal funding; and in the rural areas, all facilities classified as major collector and above are eligible.

- 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?**

Clark County is served by C-TRAN public transit services, though service is not available Clark countywide. C-TRAN provides fixed route, demand-responsive, ADA-accessible transit (C-VAN) to serve people with disabilities; and C-TRAN offers a vanpool program.

¹⁶ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation>

- 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).**

Transportation projects are identified and listed in the RTP, with regional and local projects listed in RTP Chapter 6 and Appendix N.

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

The RTP is a nonproject action; but the RTP does inventory the water, rail, and air transportation opportunities available within and through Clark County.

- 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?**

The RTP addresses vehicle trip generation. The Plan describes RTC's regional travel forecasting model, which is used as a tool to identify future transportation needs. It is estimated that by 2045, over 2.34 million person trips will be produced in Clark County on an average day, increasing from 1.64 million in base year 2020—a 43% increase. Peak volumes occur in the p.m. peak hours between 4:00 p.m. and 6:00 p.m., depending on location within the region.

- 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.**

Adoption of the RTP is not project-specific. Agricultural and forest products move on Clark County highways. Grain is transported to the Port of Vancouver USA by barge via the Snake/Columbia River marine corridor. Forest products are moved by truck from forested areas of upland north and east Clark County.

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

Transportation impacts will be addressed at the project level. The Growth Management Act requires that infrastructure is provided concurrent with development. The RTP recommends further development of alternative transportation modes and transportation strategies to make more efficient use of the existing regional transportation system.

15. Public services

[Find help answering public service questions¹⁷](#)

- 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.**

Proposed adoption of the RTP is a nonproject action. However, implementation of transportation system projects will add to the maintenance needs of the system. As the transportation system is expanded and as the system uses increasingly sophisticated treatments for provision of transportation system management maintenance needs are increased.

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

Proposed adoption of the RTP is a non-project action. Local jurisdictions with an impact fees ordinance have the discretion to assess impact fees on new developments. Transportation impact fees serve to reduce the demand for public funding to support transportation improvement projects.

16. Utilities

[Find help answering utilities questions¹⁸](#)

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

The proposal is not site-specific. Throughout the Clark County region, the following utilities are available: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, and cable TV.

- 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 proposal is not site-specific. Coordination between transportation system improvements and utility service provision will be addressed as specific projects are designed.

¹⁷ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-15-public-services>

¹⁸ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities>

C. Signature

[Find help about who should sign](#)¹⁹

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.

 Judith R. Perez Keniston

Type name of signee: Judith R. Perez Keniston, AICP

Position and agency/organization: Principal Planner, RTC

Date submitted: November 22, 2023

D. Supplemental sheet for nonproject actions

[Find help for the nonproject actions worksheet](#)²⁰

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?

Adoption of the RTP for Clark County would not increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise. However, the projects and programs identified in the RTP have the potential to cause these impacts. Project impacts will be addressed at the project level environmental review stage as they are implemented by local jurisdictions and transportation agencies.

Proposed measures to avoid or reduce such increases are:

The RTP for Clark County plans for a balanced, multimodal transportation system, including recommendations for improvements to nonpolluting, nonmotorized

¹⁹ <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature>

²⁰ <https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions>

transportation modes and for using the existing transportation system more efficiently through Transportation Demand Management and Transportation System Management strategies. Turnover in the vehicle fleet will result in “cleaner,” less polluting vehicles. Prior to project construction, stormwater quality and quantity is addressed during project design and with project level environmental review with mitigation measures identified as appropriate. Stormwater runoff can be treated in biofiltration swales or other approved treatment facilities prior to discharge to surface waters.

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

Adoption of the RTP for Clark County would not affect plants, animals, fish, or marine life. When projects identified in the RTP are developed, the responsible jurisdiction will address how the flora and fauna may be affected.

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

Adoption of the RTP for Clark County by itself would not affect plants, animals, fish, or marine life. Measures to protect or conserve flora and fauna will be addressed during plan implementation at the project design phase.

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

The proposed action to adopt the updated RTP will not deplete energy or natural resources by itself. However, transportation vehicles are users of energy resources; and land taken up by transportation projects can use up natural resource lands.

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

The proposed action to adopt the updated RTP will not deplete energy or natural resources. The RTP includes strategies to protect and conserve energy and natural resources by reducing the demand for Single Occupant Vehicle (SOV) use by increasing public transportation services and pedestrian and bicycling facilities. Other measures included in the RTP intended to conserve or reduce energy use by bringing more efficiencies into the transportation system include transportation demand management (TDM) programs, such as the Commute Trip Reduction (CTR) program, and Transportation System Management and Operations strategies, such as intelligent transportation system implementation. For projects identified in the RTP, measures to protect or conserve energy and natural resources will be addressed by the responsible jurisdiction, if applicable, during specific project development when SEPA will be addressed at the project level.

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?

Adoption of the RTP for Clark County would not by itself use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection. Transportation projects recommended in the RTP may pass within or adjacent to areas designated as environmentally sensitive. Such areas were identified as part of the Growth Management Act planning process carried out by jurisdictions in Clark County. For projects identified in the RTP, the likelihood of the project to use or affect environmentally sensitive areas or areas designated or eligible or under study for governmental protection, if any, will be identified by the responsible jurisdiction at the project-level review phase as part of a project-specific SEPA checklist.

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

The adoption of the RTP would not by itself use or affect environmentally sensitive areas or areas designated or eligible or under study for governmental protection. Therefore, no measures to protect, avoid, or reduce impacts to these resources are proposed or required. The RTP relies on information on environmentally sensitive areas identified during the GMA planning process. Further analysis of the possible impacts and measures to reduce impacts will be addressed as part of the environmental review of individual transportation projects.

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 adoption of the RTP for Clark County would not by itself affect land and shoreline use or allow or encourage land or shoreline uses incompatible with existing plans. The RTP has been developed in coordination with Growth Management Comprehensive Plans for local jurisdictions; therefore, there is compatibility between the proposed transportation system improvements and proposed land use development patterns within the county. The RTP emphasizes the importance of coordination between regional transportation and land use planning. RTC has a role in reviewing local and regional comprehensive, land use, and transportation plans for consistency with the RTP as outlined in the plan (Chapter 2). For projects identified in the RTP, the likelihood of the project to affect land and shoreline use, or allow or encourage land or shoreline uses incompatible with existing plans, if any, will be identified by the responsible jurisdiction during the project-level SEPA review phase.

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

The adoption of the RTP for Clark County would not by itself impact shorelines and land use therefore no measures to avoid or reduce shoreline and land use impacts are proposed or required. However, the plan details the requirements, particularly under

the Growth Management Act, for local and regional comprehensive, land use and transportation plans to be consistent with the RTP. RTC's role and responsibilities for ensuring consistency are outlined in Chapter 1 of the RTP. For projects identified in the RTP, measures to avoid or reduce shoreline and land use impacts will be identified, as appropriate, by the responsible jurisdiction at the project-level SEPA review phase (SEPA checklist). With implementation of the RTP, during a project's design phase, shoreline permits will be applied for, as necessary, once alignments and designs have been selected and approved.

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

The adoption of the RTP would not, by itself, directly increase demands on public services and utilities. While the RTP for Clark County is a non-project action, the plan documents the forecast growth in population and employment and the consequent growth in travel demand. The twenty-year Regional Transportation Plan (RTP) forecasts growth in travel demand over the twenty plus-year planning period, 2024 to 2045, with travel demand increasing from 1.64 million-person trips per day in 2020 to over 2.34 million trips in 2045.

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

The RTP recommends balanced, multi-modal transportation system improvements to meet the increased travel demand as documented in chapter 3. The RTP includes transportation projects, within the fiscal constraints of the plan, which would increase the regional lane miles to about 2,425 lane miles by 2045 and fixed-route transit service levels are planned to increase by about 4% per year between 2019 and 2030 per C-TRAN 2030. The plan also calls for further development of projects to accommodate non-motorized, pedestrian and bicycle, modes of travel, system management measures and travel demand management measures. Reducing or controlling air quality impacts from mobile source emissions is also a component of the RTP. While specific Transportation Control Measures (TCMs) are not required in Clark County, there is a biennial inspection and maintenance (I/M) program required for vehicles within the region's Air Quality Maintenance Area though this emissions test program will cease in 2020. Other measures used to control or reduce transportation demands and emissions include Transportation Demand Management (TDM) and Transportation System Management and Operations (TSMO) strategies. TSMO measures include Intelligent Transportation System (ITS), such as traffic control, signal coordination, incident management, and traveler information. An example of a successful TDM strategy in the region is the Commute Trip Reduction (CTR) program which encourages the use of transportation alternatives to the Single Occupant Vehicle (SOV), such as carpooling, vanpooling, use of public transit, biking and walking. Other CTR strategies include alternative work schedules such as a compressed workweek, flextime, or telecommuting. Employer programs incentivize the CTR programs; and

there is parking management, education, information, ride matching, and other measures used to help implement the program. The City of Vancouver's Destination Downtown program uses TDM measures to reduce SOV trips into the downtown core.

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

The RTP for Clark County does not conflict with local, state, or federal laws or requirements for the protection of the environment. One of the key goals of the RTP is stated to "To design and maintain a resilient transportation system that will protect and enhance the natural environment" (Chapter 3).

The RTP conforms to federal laws (40 CFR § 93.126), specifically regulations governed by the Environmental Protection Agency (EPA). The RTP is consistent with federal regulations requiring the RTP to address environmental mitigation (see RTP Appendix I and J) focused on the policy, programmatic, and strategic level rather than at the project level. The environmental mitigation strategies described in the RTP are regional in scope and may not address potential impacts at the local or project-level, which are the responsibility of the sponsor agency. Legal requirements for the protection of the environment for specific projects identified in the RTP will be identified, as appropriate, by the responsible jurisdiction during the project-level review phase, potentially through use of a project-specific SEPA checklist.

RTC consults with environmental partners such as the Southwest Clean Air Agency, the Washington State Department of Ecology, and the US Environmental Protection Agency (EPA) as part of the metropolitan transportation planning process. Federal and state land management agencies and local tribes are also contacted for input on the draft RTP. This State Environmental Policy Act (SEPA) checklist was completed as part of the RTP's development process and distributed to relevant agencies and provided to the public for review and comment.







RTC-SEPA Packet-20231122

Final Audit Report

2023-11-21

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