SEPA[1] Environmental Checklist

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:**

   City of Ilwaco Annual Comprehensive Plan Amendment – Community Recreational Infrastructure Plan Element and Critical Areas Ordinance (CAO) Update

2. **Name of applicant:**

   City of Ilwaco

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

   Holly Beller
   City Administrator
   PO Box 548
   Ilwaco, WA 98624
   treasurer@ilwaco-wa.gov

4. **Date checklist prepared:**

   October 13, 2026

5. **Agency requesting checklist:**

   City of Ilwaco

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

   A public hearing will be held with the Planning Commission on December 1, 2026, to consider recommendation of approval to the City Council for the amendments to the City of Ilwaco's Comprehensive Plan to include a new Community Recreational Infrastructure Plan Element and for the periodic update of Chapter 15.18, *Critical Areas*, of the Ilwaco Municipal Code (IMC) as required under the Growth Management Act (GMA). The amendments are targeted to be adopted by the City Council on December 14, 2026.

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

   City of Ilwaco, in accordance with RCW 36.70A.130, is conducting annual amendments to the Comprehensive Plan to incorporate a new Community Recreational Infrastructure Element and is completing the periodic update of Chapter 15.18, *Critical Areas*, of the IMC as required under the GMA. This non-project action requires SEPA Determination pursuant to Ilwaco Municipal Code (IMC) 15.56 and WAC 197-11-800. No further activity is planned for this proposal.

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

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

   Environmental information prepared in support of this non-project action includes:

   • Best Available Science (BAS) Review Technical Memorandum (Facet 2026): This review evaluated current scientific literature and practices related to critical areas protection, incorporating the Pacific County 2026 Critical Areas and Resource Land Best Available Science Review.

   • CAO Gap Analysis (Facet 2026): Identified where the existing critical areas code may be inconsistent with current best available science or regulatory guidance or can improve implementation.

   • Commerce Critical Areas Checklist

   • WDFW Riparian Management Zone (RMZ) Checklist for Critical Areas Ordinances

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.**

   This is a non-project action. Any complete and accepted property specific development applications will be vested under the current policies of the Ilwaco Comprehensive Plan and regulations of the Ilwaco Municipal Code.

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

    The City of Ilwaco City Council must approve the amendments to the Comprehensive Plan and the periodic update of Chapter 15.18, *Critical Areas*, of the Ilwaco Municipal Code, 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 Ilwaco proposes to complete an annual amendment of their Comprehensive Plan in accordance with RCW 36.70A.130 to incorporate a new Community Recreational Infrastructure Plan Element and complete the periodic update of Chapter 15.18, *Critical Areas*, of the Ilwaco Municipal Code as required by the GMA.

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 amended regulations would apply within the city limits of the City of Ilwaco.

B.Environmental Elements

1. Earth

Find help answering earth questions[3]

a. General description of the site:

City of Ilwaco contains flat, hilly, rolling, and steep slopes areas.

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

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

N/A; this is a non-project action. City of Ilwaco contains a variety of terrain, including steep and potentially unstable slopes.

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.

N/A; this is a non-project action. A variety of soils can be found within the city limits.

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

N/A; this is a non-project action. The City of Ilwaco includes mapped steep and unstable slopes, including erosion and landslide hazard areas as well as areas at risk of liquefaction.

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.

N/A; this is a non-project action. Future development proposals that include filling, excavation, or grading activities will be reviewed on an individual basis.

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

N/A; this is a non-project action. Future development proposals that include clearing or construction activities will be reviewed on an individual basis and must comply with the requirements contained within IMC 14.10, *Clearing and Grading*. Critical area regulations under IMC 15.18.050 include erosion hazard area protections and project-specific assessments.

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

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

N/A; this is a non-project action. Future development proposals will be reviewed for compliance with all applicable policies and regulations.

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

N/A; this is a non-project action. As such, no measures to reduce or control erosion are required. Future development proposals will be reviewed for consistency with all applicable policies and regulations. Erosion hazard reduction and control are addressed in the City's Critical Area Ordinance, Ilwaco Municipal Code 15.18.050 and IMC 14.10, Clearing and Grading.

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.

N/A; this is a non-project action.

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

N/A; this is a non-project action.

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

N/A; this is a non-project action.

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.

N/A; this is a non-project action. The City of Ilwaco contains several bodies of water including Black Lake, the Wallacut River, and Baker Bay (Columbia River). Additionally, several unnamed streams, ponds, and wetlands, including bog wetlands, are found within city limits.

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

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.**

   N/A; this is a non-project action. Development applications will be reviewed on an individual basis for consistency with all applicable codes and regulations.

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.**

   N/A; this is a non-project action, which does not include any fill or dredging activities.

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

   N/A; this is a non-project action.

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

   N/A; this is a non-project action. Portions of the City of Ilwaco are located within a 100-year floodplain, including portions of the shoreline along Baker Bay, the Port of Ilwaco and the neighborhood of Vandalia.

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.**

   N/A; this is a non-project action. Development applications will be reviewed on an individual basis for consistency with all applicable codes and regulations.

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.**

   N/A; this is a non-project action, which will not withdraw groundwater. Development applications will be reviewed on an individual basis for consistency with all applicable codes and regulations.

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.**

[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

N/A; this is a non-project action, which would not discharge any waste material into the ground from septic tanks or domestic sewage service. Development applications will be reviewed on an individual basis for consistency with all applicable codes and regulations.

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.**

   N/A; this is a non-project action. No runoff would result directly from this proposal. Individual projects would be evaluated for consistency with the City's stormwater regulations and all other applicable codes.

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

   N/A; this is a non-project action, which would not generate waste materials into the ground or surface waters. Individual projects would be evaluated for consistency with the City's stormwater regulations and all other applicable codes.

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

   N/A; this is a non-project action, which would not alter drainage patterns. Individual projects would be evaluated for consistency with the City's stormwater regulations and all other applicable codes.

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

N/A; this is a non-project action. When future development proposals are submitted, any water-related impacts created during clearing and construction activities will be mitigated in compliance with the City's stormwater regulations and the most recent version of the Department of Ecology Stormwater Management Manual for Western Washington (SWMMWW), where applicable.

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**

N/A; this is a non-project action. A variety of vegetation is found within the City of Ilwaco, including deciduous and evergreen trees, shrubs, grass, herbs, wet soil plants, and aquatic vegetation.

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

N/A, this is a non-project action. When a specific development proposal is submitted, the kind and amount of vegetation to be removed or altered will depend on City requirements.

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

N/A, this is a non-project action. There are several mapped rare or vulnerable plant species found within the city as mapped by Washington Department of Natural Resources Natural Heritage Program[8], including, but not limited to, Shore Pine, Sitka Spruce / Salal forest / Salmonberry, Slough Sedge - Yellow Skunk-cabbage Swamp, ocean-bluff bluegrass, Tidal Salt Marsh (Chairmaker's Bulrush, Common Threesquare), Lyngby's Sedge Salt Marsh, Tufted Hairgrass - Pacific Silverweed Salt Marsh, coyotebush, and Pacific Silverweed – Baltic Rush Salt Marsh.

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

N/A, this is a non-project action.

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

N/A, this is a non-project action. Several types of noxious weeds and/or invasive species may be found within the City of Ilwaco. A list of Class A, B, and C noxious weeds that may be found in the vicinity of the City of Ilwaco can be found on the Pacific County Department of Invasive Species and Vegetation Management website at www.pcweeds.org.

5. Animals

Find help answering animal questions[9]

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:**

[8] DNR

[9] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-5-Animals

- **Mammals: deer, bear, elk, beaver, other:**
- **Fish: bass, salmon, trout, herring, shellfish, other:**

A variety of birds, mammals, and fish are known to have habitat within the City of Ilwaco.

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

N/A, this is a non-project action. The following are listed as threatened, endangered, or candidate species within the City of Ilwaco:

Species	Federal Status	State Status
Fish		
Bull Trout (*Salvelinus confluentus*) (Coastal/Puget	Threatened	Candidate
Birds		
Marbled Murrelet (*Brachyramphus marmoratus*)	Threatened	Endangered
Western Snowy Plover *(Charadrius nivosus nivosus)*	Threatened	Endangered
Streaked Horned Lark *(Eremophila alpestris strigata)*	Threatened	Endangered
Yellow-billed Cuckoo (*Coccyzus americanus*)	Threatened	Endangered
Insects		
Monarch Butterfly (*Danaus Plexippus*)	Candidate	Candidate
Suckley's cuckoo bumble bee (*Bombus suckleyi*)	Proposed endangered	Not listed.

Sources: US Fish and Wildlife Service (USFWS) Electronic Reference (iPAC); WDFW PHS Mapper;

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

The City of Ilwaco is located within the Pacific Flyway migration route utilized by waterfowl migrating north into Alaska and northern Canada. The Pacific Flyway extends from Mexico to Canada and Alaska.

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

N/A, this is a non-project action.

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

N/A, this is a non-project action.

6. Energy and natural resources

Find help answering energy and natural resource questions[10]

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.

N/A, this is a non-project action. Applications for construction will be reviewed on an individual basis for consistency with all applicable codes and regulations, including the Washington State Energy Code requirements.

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

N/A, this is a non-project action. Development applications will be reviewed on an individual basis for consistency with all applicable codes and regulations, including height requirements.

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.

N/A, this is a non-project action.

7. Environmental health

Health Find help with answering environmental health questions[11]

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.

N/A, this is a non-project action.

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

   N/A, this is a non-project action. Washington State Department of Ecology maps Model Toxics Control Act (MTCA) cleanup site throughout the state. MTCA cleanup sites are mapped within the City of Ilwaco. Several of those sites are marked as cleanup complete. (https://ecology.wa.gov/spills-cleanup/contamination-cleanup/cleanup-sites)

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.**

[10] 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
[11] 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

N/A, this is a non-project action.

3. **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

   N/A, this is a non-project action.

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

   N/A, this is a non-project action.

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

   N/A, this is a non-project action. No measures are required to reduce or control environmental health hazards for this proposal.

b. Noise

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

   N/A, this is a non-project action.

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)?**

   N/A, this is a non-project action.

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

   N/A, this is a non-project action. No measures are required to reduce or control noise impacts for this proposal.

8. Land and shoreline use

Find help answering land and shoreline use questions[12]

a. **What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

   The proposal is a non-project action. Land uses within the City of Ilwaco consist of a variety of types of land use including residential, commercial, recreational, industrial, multi-family, public institutional uses, and vacant land.

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**

[12] 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

not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

N/A; this is a non-project action.

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?**

   N/A; this is a non-project action.

c. Describe any structures on the site.

N/A; this is a non-project action.

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

N/A; this is a non-project action.

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

N/A; this is a non-project action. Zoning classifications in the City of Ilwaco include:

- C-1 – Core Commercial
- C-2 – Low Density Commercial
- M-1 – Light Industrial
- P – Park
- R-1 – Single Family Residential
- R-2 – Multi-Family Residential
- R-3 – Resort Residential
- R-4 – Recreational Residential
- R-5 - Recreation

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

N/A; this is a non-project action. City of Ilwaco Comprehensive Plan designations include:

- Parks and Recreation
- Commercial
- Industrial
- Low Density Residential
- Medium Density Residential
- Water

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

N/A; this is a non-project action. The City of Ilwaco Shoreline Master Program includes the following shoreline environment designations:

- Shoreline Residential
- Urban Conservancy
- High Intensity
- Natural

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

N/A, this is a non-project action. Portions of the City of Ilwaco include wetlands, streams, fish and wildlife habitat conservation areas, frequently flooded areas, critical aquifer recharge areas, and/or geologically hazardous areas.

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

N/A; this is a non-project action. Estimated City population: 1,095

Source: Office of Financial Management, April 1, 2026, Population of cities, towns and counties

https://ofm.wa.gov/sites/default/files/public/dataresearch/pop/april1/ofm_april1_population_final.pdf

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

N/A; this is a non-project action that would not displace any people.

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

N/A; this is a non-project action. No measures to avoid or reduce displacement impacts are required for this proposal.

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

N/A; this is a non-project action.

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

N/A; this is a non-project action.

9. Housing

Find help answering housing questions[13]

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

N/A; this is a non-project action.

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

N/A; this is a non-project action.

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

[13] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-9-Housing

N/A; this is a non-project action.

10. Aesthetics

Find help answering aesthetics questions[14]

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

N/A; this is a non-project action. Future development proposals that include construction of structures will be required to comply with the height restrictions contained within the applicable Zoning district.

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

N/A; this is a non-project action.

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

N/A; this is a non-project action. All future development proposals will be reviewed for consistency with the applicable policies and regulations.

11. Light and glare

Find help answering light and glare questions[15]

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

N/A; this is a non-project action.

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

N/A; this is a non-project action.

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

N/A; this is a non-project action.

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

N/A; this is a non-project action.

12. Recreation

Find help answering recreation questions

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

N/A; this is a non-project action. The City of Ilwaco has several recreational facilities including playgrounds, trails, athletic fields, multi-use sports fields, and the marina at the Port of Ilwaco.

[14] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-10-Aesthetics
[15] 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

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

N/A; this is a non-project action. All legally existing recreational uses will be vested under the current critical area regulations.

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

N/A; this is a non-project action. As such, no measures to reduce or control impacts on recreation or recreational opportunities are required.

13. Historic and cultural preservation

Find help answering historic and cultural preservation questions[16]

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.

N/A; this is a non-projection action. Future development will be subject to site specific assessment.

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.

N/A; this is a non-projection action. Future development will be subject to site specific assessment and compliance with all applicable local, state and federal regulations

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.

N/A, this is a non-project action, which would not result in impacts to cultural and historic resources. Future development will be subject to site specific assessment.

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.

N/A; this is a non-projection action. Future development will be reviewed for consistency will all applicable policies and regulations.

[16] 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

14. Transportation

Find help with answering transportation questions[17]

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.

N/A; this is a non-projection action. Future development will be subject to site specific assessment and will be reviewed for consistency with all applicable policies and regulations.

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?

N/A; this is a non-projection action. Future development will be subject to site specific assessment and will be reviewed for consistency with all applicable policies and regulations.

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).

N/A; this is a non-projection action. Future development will be subject to site specific assessment and will be reviewed for consistency with all applicable policies and regulations.

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

N/A; this is a non-projection action.

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?

N/A; this is a non-projection action.

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.

N/A; this is a non-projection action.

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

N/A; this is a non-projection action. Future development will be reviewed for consistency will all applicable policies and regulations.

[17] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation

15. Public services

Find help answering public service questions[18]

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.**

   N/A; this is a non-projection action.

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

   N/A; this is a non-projection action. Future development will be reviewed for consistency will all applicable policies and regulations.

16. Utilities

Find help answering utilities questions[19]

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

   N/A; this is a non-projection action. Utilities available within the City of Ilwaco include sewer, water, septic systems, electricity, propane, refuse service, and telephone/internet/cable.

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.**

   N/A; this is a non-projection action. Future development proposals will be reviewed for consistency all applicable policies and regulations.

C.Signature

Find help about who should sign[20]

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 _____

Type name of signee: Holly Beller

[18] 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
[19] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-b-environmental-elements/environmental-elements-16-utilities
[20] https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-C-Signature

Position and agency/organization: City of Ilwaco

Date submitted: November 18, 2026

D.Supplemental sheet for nonproject actions

Find help for the nonproject actions worksheet[21]

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 amendment to the City of Ilwaco Comprehensive Plan to incorporate a new Community Recreational Infrastructure Plan Element and the periodic update of Chapter 15.18, *Critical Areas*, of the Ilwaco Municipal Code, are not expected to increase discharges to water, emissions to air, production, storage, or release of toxic or hazardous substances, or production of noise. Individual development applications must comply with all applicable codes and regulations to prevent or mitigate adverse impacts.

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

     Project proposals must comply with all other local, state, and federal requirements for development. The existing City codes include restrictions on uses, activities, and development that prevent the discharge of water or release of toxic or hazardous substances into the water.

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

   The proposed amendment to the City of Ilwaco Comprehensive Plan to incorporate a new Community Recreational Infrastructure Plan Element and the periodic update of Chapter 15.18, *Critical Areas,* of the Ilwaco Municipal Code, are not anticipated to affect plants, animals, fish, or marine life. The proposed amendments include increased protection standards based on best available science and updated state guidance.

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

     The proposed amendments are intended to improve protection of critical areas, recreational opportunities, open spaces and water quality of areas that plants, animals, and fish rely on for habitat. Additionally, recommendations for critical area buffer determinations based on Site Potential Tree Height (SPTH) of the dominant tree species at age 200 years and riparian management zones (RMZ) are proposed in

[21] https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions

order to preserve water quality buffer functions and wildlife habitat. It is also proposed to review the currently listed threatened and endangered species based on best available science.

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

   The proposed amendment to the City of Ilwaco Comprehensive Plan to incorporate a new Community Recreational Infrastructure Plan Element and the periodic update of Chapter 15.18, *Critical Areas*, of the Ilwaco Municipal Code, are not anticipated to deplete energy or natural resources.

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

     The proposed amendment to the City of Ilwaco Comprehensive Plan to incorporate a new Community Recreational Infrastructure Plan Element includes goals and objectives to conserve and steward natural resources, a conditions assessment, a capital facilities program for park and open space acquisition and increased amenities at existing park areas based upon public feedback. The element also supports an interconnected system of multi-use trails. A co-benefit of providing accessible community recreational infrastructure includes reduced reliance on vehicles that may contribute to a reduction in greenhouse gas emissions. The proposed amendments to IMC 15.18, *Critical Areas*, include improved protection standards for critical areas. These increased standards are expected to preserve and protect natural resources.

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 amendment to the City of Ilwaco Comprehensive Plan to incorporate a new Community Recreational Infrastructure Plan Element is intended to identify park improvements and acquisition. The proposed amendments to IMC 15.18, *Critical Areas*, are based on the best available science, updates to state guidance or laws, and to improve application or clarity. These amendments are intended to increase protection standards for environmentally critical areas.

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

     The proposed amendments are expected to reduce impacts to critical areas and related functions and values. Updated guidance for wetlands management is proposed. This includes adopting the newest Western Washington wetlands rating system and requiring updated ratios for compensatory mitigation. Updated standards for protection of fish and wildlife habitat conservation areas included modifying required buffer widths and allowances for structures and uses within critical areas and their buffers.

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?**

This non-project action does not allow or encourage land or shoreline uses incompatible with existing plans. The proposal includes amendments to IMC 15.18, *Critical Areas*, which would improve administration of land and shoreline use codes.

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

  Development will be required to comply with all other applicable policies and regulations to protect environmentally critical areas, where applicable.

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

   Increased demands on transportation, utilities, or public services are not expected from this non-project action.

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

     Increased demands on transportation, utilities, or public services are not expected from this non-project action. Future development will be required to comply with all applicable policies and regulations.

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

   This non-project action is not expected to be in conflict with any local, state or federal laws. The proposed amendments to the City of Ilwaco Comprehensive Plan and Chapter 15.18 of the Ilwaco Municipal Code have been reviewed for compliance with local, state, and federal laws.