



STATE ENVIRONMENTAL POLICY ACT (SEPA), CHAPTER 43.21C RCW  
MITIGATED DETERMINATION OF NON-SIGNIFICANCE (MDNS)

CLALLAM COUNTY DCD  
EXHIBIT 15  
DATE 2/3/2022

**Applicant:** Olympic Systems Properties

**SEPA Project #:** ECL2021-00019, CUP2021-00005

**Lead Agency:** Clallam County Department of Community Development (DCD)

**Description of Proposal:** The applicant is proposing to construct a Solid Waste Transfer Station and Community Recycling Center on a 5.46 acre parcel zoned Carlsborg Industrial (CI). The project will contain a 15,000 square foot Transfer Station for both public and commercial drop-off and commercial haul-off, a 1,000 square foot public Recycle Center, a less than 2000 square foot office and employee breakroom, and a 400 square foot scale house. The total impervious surfacing is projected at 163,000 square feet. Water will be provided by the PUD and sewage disposal will be provided by the Carlsborg Sewer. Access is proposed off Business Park Loop.

**Location of Proposal:** The subject property is located in the northern portion of the Carlsborg UGA, south of Olympic Disposal Shop site, near the intersection of Carlsborg Road and Business Park Loop, being within Section 15, Township 30 N, Range 4 W, W.M., Clallam County, Washington, referenced as Assessor’s parcel number 043015-409010.

**Required Permits/Approvals:** approved Conditional Use Permit, building permits, potable water approval, sewer connection, engineered drainage plan, landscaping, lighting, Solid Waste permit, and parking plan.

**SEPA Threshold Determination:** The lead agency has determined that this proposal will not result in probable significant adverse impacts to the environment and has issued a Mitigated Determination of Non-Significance (MDNS) under WAC 197-11-340(2). An environmental impact statement is not required under RCW 43.21.030 (2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency and existing regulations applicable to the proposal. This information is available to the public upon request during normal business hours and can be found on the Clallam County Online Permit website at [www.clallam.net/Permits](http://www.clallam.net/Permits).

**Mitigating Conditions:**

1. Due to the urban location of the site, surrounding the historic center of Carlsborg, and varying wind patterns in the area, in order to mitigate odor, noise and aesthetic concerns the facility should be located within a fully enclosed building and utilize mechanical solutions to ensure no odor is created by the facility.
2. Per CCC 27.12.615(5) a report shall be submitted with the engineered drainage plan showing that the facility will not significantly impact ground water resources.
3. To mitigate potential emissions from vehicles, beyond the proposed maintenance of vehicles and equipment, the facility should only be open to the public from 9am to 5pm and closed on Sundays to align with the other facilities in the County. Being closed on Sundays just like the Port Angeles Regional and Blue Mountain Transfer Station will limit the number of people hauling trash from farther locations, which will reduce emissions, as well as reduce potential liter.



## STATE ENVIRONMENTAL POLICY ACT (SEPA), CHAPTER 43.21C RCW MITIGATED DETERMINATION OF NON-SIGNIFICANCE (MDNS)

4. Use of solid walls shall be incorporated in the design of the structure and within the landscaping to help minimize impacts of noise, lights and aesthetic impacts to residential properties and the public streets. In compliance with the standards of CCC 33.20.060(3) the entire facility is loading/unloading and storage of garbage and recycling, therefore screening will be required, which again supports the need for the facility to be entirely indoors. Solid walls are described for use to help minimize impacts of noise, lights and aesthetic impacts to residential properties, but should also be considered from the public streets since the facility is associated with the hauling and loading of garbage.
5. To mitigate the location of the recycling dumpster a new landscaping plan shall be submitted complying with the standards of CCC 33.20.030(6) in addition to the minimum landscaping standards of CCC 33.53 that should address the location, orientation, and access of the proposed recycling dumpster which should be shielded from Business Park Loop.
6. A lighting plan shall be submitted and approved prior to the issuance of a building permit to ensure no off-site glare to the street or adjacent properties. All outdoor lighting shall be directed downward and shielded to prevent glare and light trespass onto neighboring properties and roads. The lighting plan shall be prepared by a qualified professional and note the location, type, and intensity of lighting. It shall also demonstrate how location, type, and mitigation measures (ie. shielding) will prevent glare and light trespass. The approved plan must be implemented and any significant changes to the number of lighting fixtures, location, and intensity will require an updated lighting plan to be approved by Clallam County.
7. In order to address Impacts to the Olympic Discovery Trail, a landscaping plan shall be submitted that shows the proposed landscaping along the trail outside of the easement, along the entire length of the trail, since no crossing of the trail will be allowed between the two parcels.
8. A new Traffic Study with 6-year and 20-year projection, assuming reasonable buildout, for the intersection at the north of Business Park Loop and Carlsborg Road, including data from Savannah Lane and Village Lane to the west shall be provided.

**Public Hearing:** A Public Hearing (where public testimony can be given) on this proposal has been scheduled for February 3, 2022 before the Clallam County Hearing Examiner at 1:00pm. The decision on the Conditional Use Permit will be made by the Hearing Examiner within 10 working days of the record closing. Any person may write a request to DCD to receive notice of the decision once it is made.

**Comment Period:** The DCD SEPA Memo dated December 30, 2021 (attached) provides supplemental analysis of the impacts of this proposal. Comments on this MDNS and the environmental impacts can be provided at the hearing scheduled February 3, 2022 at 1pm. Unless the Responsible Official withdraws the threshold determination pursuant to WAC 197-11-340(3)(a), the threshold determination shall be final at the end of the comment period. Agencies and interested parties will be notified if the threshold determination is withdrawn.

**Staff Contact:** For additional information, contact Donella Clark at the address below or 360-417-2594, [dclark@co.clallam.wa.us](mailto:dclark@co.clallam.wa.us).



**STATE ENVIRONMENTAL POLICY ACT (SEPA), CHAPTER 43.21C RCW  
MITIGATED DETERMINATION OF NON-SIGNIFICANCE (MDNS)**

**Responsible Official:** Mary Ellen Winborn, Director

**Address:** Clallam County Department of Community Development  
RE: SEPA COMMENTS  
223 E. 4<sup>th</sup> Street, Suite 5  
Port Angeles, WA 98362

**Issuance Date:** 1/5/2022

**Signature:** Mary Ellen Winborn  
Mary Ellen Winborn, Director

**Appeals:** Unless the Responsible Official withdraws the threshold determination pursuant to WAC 197-11-340, the threshold determination shall be final at the comment period. The final threshold determination may be appealed to the Hearing Examiner by filing a written appeal with the applicable fee. Contact the Clallam County Permit Center for SEPA appeal procedures, Donella Clark, Principal Planner, Clallam County DCD Permit Center, 223 East Fourth Street, Suite 5, Port Angeles, WA 98362, (360)417-2594 or by e-mail at [dclark@co.clallam.wa.us](mailto:dclark@co.clallam.wa.us).

**M E M O R A N D U M**  
**Clallam County Department of Community Development**

---

**DATE:** December 30, 2021

**PROPOSAL:** The applicant is proposing to construct a Solid Waste Transfer Station and Community Recycling Center on a 5.46 acre parcel zoned Carlsborg Industrial (CI). The project will contain a 15,000 square foot Transfer Station for both public and commercial drop-off and commercial haul-off, a 1,000 square foot public Recycle Center, a less than 2000 square foot office and employee breakroom, and a 400 square foot scale house. The total impervious surfacing is projected at 163,000 square feet. Water will be provided by the PUD and sewage disposal will be provided by the Carlsborg Sewer. Access is proposed off Business Park Loop.

**CASE NUMBER:** CUP2021-00005, ECL2021-00019

**TO:** Mary Ellen Winborn, Director  
Clallam County Department of Community Development

**FROM:** Donella Clark, Principal Planner (360) 417-2594

**RE:** Environmental Review and Staff Recommendation for  
SEPA Determination for proposed Solid Waste Transfer Station and  
Community Recycling Station

**APPLICANT:** Olympic Systems Properties  
PO Box 698  
Carlsborg, WA 98324

**LOCATION:** The subject property is located in the northern portion of the Carlsborg UGA, south of Olympic Disposal Shop site, near the intersection of Carlsborg Road and Business Park Loop, being within Section 15, Township 30 N, Range 4 W, W.M., Clallam County, Washington, referenced as Assessor's parcel number 043015-409010.

This proposal is not categorically exempt from SEPA and requires the following additional permits: approved Conditional Use Permit, building permits, potable water approval, sewer connection, engineered drainage plan, landscaping, lighting, Solid Waste permit, and parking plan.

## **A. ENVIRONMENTAL RECORD and EXHIBITS**

The environmental review consisted of analysis based on the following documents included in the environmental record.

- Environmental Checklist dated October 2021
- Phase I Environmental Report
- Traffic Impact Analysis
- Geotechnical Engineer Report
- Clallam County Comprehensive Plan - Title 31 CCC
- Clallam County Zoning Ordinance - Title 33 CCC
- Clallam County Critical Areas Ordinance – Title 27.12 CCC
- Clallam County Solid Waste Management Plan
- EPA Waste Transfer Stations

Unless otherwise noted, the above information is available for review between the hours of 8:00 AM and 4:30 PM Monday through Friday at the Clallam County Department of Community Development, Clallam County Courthouse, 223 E. Fourth Street, Port Angeles, Washington 98362.

## **B. STAFF AMENDMENTS TO THE ENVIRONMENTAL CHECKLIST**

The following sections correspond with related categories of the environmental checklist submitted for the proposal, and clarify, amend, or add to that document.

---

### **CHECKLIST ITEMS**

#### **1. EARTH**

The site is flat with the steepest slope being less than 5%. Approximately 163,000 square feet of the site will be impervious, totaling over 80% of the 5.64 acre parcel. Approximately 18,400 square feet of structures will be constructed on the site. An engineered drainage will be required to be submitted and approved by the Clallam County Roads Department prior to issuance of the building permit, compliant with CCC 27.14 and Ecology's 2019 Western Washington Stormwater Management Manual (WWSMM).

#### **2. AIR**

During construction, best management practices are proposed for the control of dust and emissions.

Business practices and design of the transfer station are proposed to help reduce odor. Orientation of the building with two solid walls and a design that will not include any pockets or storage areas, sorting of waste for efficient removal, "balancing the floor", proper cleaning and management of leachate are the methods suggested to help reduce odor at the site. The building will be open east to west with solid walls on the north and south in order to intercept prevailing winds, though the prevailing winds are most notably from the west in this area. In an article noted by the applicant "Odor Control at Waste Disposal Facilities" by Jeff Eriks and Jesse Levin, the authors offer suggestions for odor control, and suggest mechanical solutions that help reduce odors, as well as the other two measures proposed.

This method would require a fully enclosed transfer station, with high speed doors or air curtains at entrances to trap and treat odor, but the applicant is not proposing a fully enclosed building. An open building will likely create odor, that is a probable significant impact to the surrounding area, both to residences and commercial businesses.

Another potential emission created by the site is the operation of trucks and cars that will utilize the site and the heavy equipment necessary to operate the facility. Keeping the trucks and equipment in good operating condition will limit emissions. Reducing hours of operation from the proposed 7am to 7pm, 7 days a week schedule would also reduce potential emissions from both visits and need for equipment.

### **3. WATER**

Surface Water: There are no surface waters in the vicinity of the proposal. There are no issues with this section.

Ground Water: Water will be provided by Clallam County PUD #1 and domestic sewage will be dealt with through the Carlsborg sewer. The site is located within an area designated as a Critical Aquifer Recharge Area (CARA). The Geotechnical Engineering report explored the groundwater condition and did not find it to be a limiting factor to the proposed development, though a complete analysis of the proposal on the CARA has not been provided.

Water Runoff: An engineered drainage plan will be submitted to mitigate impacts of runoff. Treatment is proposed prior to discharge to the ground. The drainage plan will be reviewed by the Roads Department for quality and quantity.

### **4. PLANTS**

A landscaping plan will be required to be approved prior to issuance of a building permit in accordance with CCC 33.53 and CCC 33.20.060. The proposed plan does not appear to consider standards required within the Carlsborg UGA, CCC 33.20.060(3). These standards require that outside storage, garbage, recycling, and loading docks be screened from view from public roads and neighboring properties.

### **5. ANIMALS**

The checklist adequately addresses the issues of this section. Operations of the facility will minimize attractiveness of the facility to birds and rodents. Birds are of special importance since the facility is near the airport, but if maintained appropriately does not pose a concern.

### **6. ENERGY AND NATURAL RESOURCES**

The checklist adequately addresses the issues of this section. Electricity will be provided by the PUD#1 and use of propane by a distributor. The building will be reviewed for compliance with the Washington State Energy Code standards during the building code process.

### **7. ENVIRONMENTAL HEALTH**

The facility is non-hazardous waste collection and transfer, which is monitored by staff during unloading of materials to ensure compliance.

Noise at the facility will be created by the loaders and heavy equipment scraping materials off the floor and moving materials around the site, back-up warning signals, traffic, and unloading of waste which can include loud crashes and breaking glass. Hitching of loads to trucks will occur which is not an uncommon sound in the industrial park.

**8. LAND AND SHORELINE USE**

The property is zoned Carlsborg Industrial (CI), which is intended “to allow for low nuisance uses,” CCC 33.20.030(6). Business parks, commercial greenhouses, industrial uses, marijuana facilities, research facilities, and wholesale commercial businesses are some of the listed uses allowed or conditionally allowed when adjacent to residential properties. The applicant argues that the use is industrial. The Clallam County Zoning Code 33.03.010(47) defines industrial use as “any premises devoted primarily to the manufacturing of finished or semi-finished products, and the processing of materials. This definition includes accessory facilities such as but not limited to storage facilities, transfer facilities, warehousing, heavy vehicular storage and repair, log storage milling and sorting.” The proposed transfer station does not process materials into finished or semi-finished products; it merely sorts materials to transfer to a different location for processing. It is the County’s determination that the proposed transfer station does not clearly fit within any of these categories and is also located adjacent to a residential zone (Carlsborg Village Center) to the east, providing two reasons for requiring review and approval of a Conditional Use Permit (CUP). EPA materials indicate that involved citizens make a difference in the location of transfer stations and communicating their benefits to the community. Processing of a CUP will provide the applicant an opportunity to propose the transfer station to the community and allow public input to better fulfill the needs of the Carlsborg Community. Processing of the CUP will also help address land use requirements and determine compatibility of the facility within the Urban Growth Area.

The Clallam County Comprehensive Plan, CCC 31.02.275, identifies that commercial and industrial uses should be cited within Urban Growth Areas, but indicates that some types may be appropriately located elsewhere, including those with objectionable nuisance characteristics. It is unclear why the proposed location has been selected as an appropriate site for a transfer station. The Clallam County Solid Waste Management Plan identifies four transfer system facilities in the County and indicates that residents and businesses in have reasonably good access to a transfer site, so it is unclear why a new transfer station is needed in the County. Analysis of the criteria used for the location of the proposal and rationale for need could help support the application for the proposed transfer station and why it should be allowed at this location and open to the public. The proposed transfer station will have numerous nuisances, such as odor, noise, traffic, and even the aesthetic impact of unsightly garbage. There is also a potential for litter in the area as people travel with loads that are not professionally tied down to the site. Loose garbage, cans, and lids can be seen strewn along the road to the Port Angeles Regional Transfer Station, which will be expected along Carlsborg Road and Business Park Loop if the proposal is approved.

The visioning of Carlsborg outlined in the Comprehensive Plan, CCC 31.03.350, is for continued commercial, industrial and residential growth, with these activities providing economic vitality to the community and industrial activities generating revenue through the creation of family wage jobs. These activities are intended to promote community viability blending well with the local character while maintaining environmental stewardship. The Carlsborg Industrial zone is intended to allow for low nuisance, low intensity industrial uses. With these ideas in mind, the placement of a transfer station, employing only 6 people, does not align with the vision of the Carlsborg Community. The known nuisances and lack of revenue generation for the community is not consistent with the Comprehensive Plan. In years past, the community has not been supportive of proposals within the industrial park perceived to have nuisances; a proposal for a crematorium in the industrial park was denied in 2008.

The property to the north of the proposal is a disposal hauling, operations, and maintenance facility that will utilize the proposed transfer station. Trucks are noted as leaving between 5 and 7am and returning between 2 and 5pm. The need for the transfer station to be open beyond 5pm with the main user arriving by 5pm does not support the transfer station being open until 7pm. The site to the north is mainly used for parking of vehicles, with maintenance of the vehicles occurring indoors and office work associated with the hauling business inside a structure onsite. This low nuisance business was determined to be a suitable business within the Carlsborg UGA through a Conditional Use Permit, and was determined to meet the vision of the Carlsborg Industrial area, CCC 31.03.350.

The property is not within the jurisdiction of the Shoreline Master Program.

**9. HOUSING**

There is no housing component.

**10. AESTHETICS**

The processing of the building permit for the proposed structures should ensure that aesthetics issues consistent with a permitted use and design standards of the building will be addressed. This will include the review of lighting, parking/access requirements, utilities, landscaping, and other associated improvements with the proposal.

The current proposal offers minimal landscaping. Perimeter landscaping is intended to soften views, and a solid fence will be provided in order to shield the facility from Carlsborg Road, Business Park Loop, and the Trail. The proposed landscaping plan fails to address the additional standards of the Carlsborg Urban Growth Area, CCC 33.20.060(3) and also fails to address the importance of the Olympic Discovery Trail (see Recreation below). Clallam County Code 33.20.060(3) provides additional standards such as screening outside storage and recycling maintenance facilities. The location, orientation, and access point of the proposed recycling dumpster does not shield this facility from Business Park Loop.

**11. LIGHT AND GLARE**

No impacts to the surrounding properties will be permitted by any proposed lighting. The proposal indicates lights will be shielded down so that there is no light trespass, nor interfere with the flight path of the Airport.

**12. RECREATION**

The checklist does not address the location of the Olympic Discovery Trail located within a 30 foot easement on the subject property. The Olympic Discovery Trail is an important recreational facility, an opportunity within Carlsborg for non-motorized transportation, and an economic opportunity in Clallam County. The proposed site plan shows the building approximately 14 feet off the edge of the easement and proposes landscaping within the easement of the trail. There are concerns related to the long-term management of vegetation and root damage to the trail if landscaping is allowed within the 30 foot easement. This section of trail is already considered narrow, both of the easement and the layout of the trail itself, and will be targeted for widening in the future. The Clallam County Comprehensive Plan CCC 31.03.195(2) encourages the enhancement of open space corridors, greenbelts and greenways, and non-motorized trails, and therefore requires that the proposed landscaping be placed outside of the easement to allow for the maintenance and widening of the trail. The landscaping will not be allowed to be within the easement and



will require moving the building to accommodate a vegetative screen along the trail. The land owner shall maintain the landscaping for the duration of the use of the property for commercial or industrial use.

The applicant is proposing a crossing of the Olympic Discovery Trail to connect the subject property and the business to the north. There is a current crossing of the trail on Carlsborg Road, and this additional crossing just for this proposal is an additional safety concern. An alternative location for the trail might be entertained by the Road Department, but crossing of the trail will not be allowed as proposed. The applicant will need to use the existing crossing of the trail on Carlsborg Road.

**13. HISTORICAL AND CULTURAL PRESERVATION**

An inadvertent discovery plan has been submitted.

East of the proposal, across Carlsborg Road is the Carlsborg historic village, which contains a mix of commercial and residential properties. This area is significant to the community as the historic center of Carlsborg, and is reflected by the Comprehensive Plan and zoning (Carlsborg Village Center) as important to the area. The citing of the transfer station directly across from the Carlsborg Village Center and the post office is of concern to the community.

**14. TRANSPORTATION**

The traffic study provided does not project sufficiently far into the future, nor does it address all affected intersections in close proximity to the proposal. The Road Department will require a 6-year and 20-year projection, assuming reasonable buildout, for the intersection at the north end of Business Park Loop and Carlsborg Road, including data from Savannah Lane and Village Lane to the west in order to determine appropriate mitigation measures. The southbound left turn lane on Carlsborg Road, which provides access to Business Park loop is currently slated to be re-stripped as a 2 way left turn lane to provide access to future development on Savannah/Village Lane. This change could create additional congestion/conflicts at the intersection and should be considered. The projected traffic from Savannah/Village Lane does not appear to be addressed in the traffic study. Mitigation will be based on analysis of this new information.

**15. PUBLIC SERVICES**

The checklist adequately addresses the issues of this section. Fire flow and other fire protection measures will need to be provided and will be reviewed through the building permit process. The checklist is adequate.

**16. UTILITIES**

The checklist description is adequate. Electricity and water will be provided by the Clallam County PUD#1. Sewage disposal will be through the Carlsborg sewer.

## CONCLUSIONS AND RECOMMENDATIONS

The environmental review indicates that there may be a potential for adverse environmental impacts from the project proposal, which may not be mitigated through conditions imposed by authority of existing Clallam County land use regulations. Therefore, a Mitigated Determination of Non-Significance (MDNS) should be required.

### Potential Significant Environmental Impacts:

Based on review of the Environmental Checklist and other available material provided on the subject proposal, Development Review staff recommends that the Responsible Official consider the following as potential significant adverse environmental impacts as a result of development of the subject proposal:

- **Stormwater impacts associated with CARA**
- **Odor control, noise, aesthetics**
- **Vehicle emissions**
- **Impacts to surrounding land uses**
- **Potential impacts caused by outdoor lighting**
- **Safety concerns of the proposed Olympic Discovery Trail crossing**
- **Traffic concerns**

These adverse impacts are capable of being mitigated to a level of non-significance if the measures identified below are implemented by the applicant.

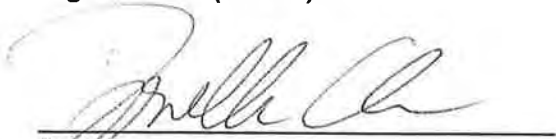
### Conditions of Approval for Mitigating Environmental Impacts

1. Due to the urban location of the site, surrounding the historic center of Carlsborg, and varying wind patterns in the area, in order to mitigate odor, noise and aesthetic concerns the facility should be located within a fully enclosed building and utilize mechanical solutions to ensure no odor is created by the facility.
2. Per CCC 27.12.615(5) a report shall be submitted with the engineered drainage plan showing that the facility will not significantly impact ground water resources.
3. To mitigate potential emissions from vehicles, beyond the proposed maintenance of vehicles and equipment, the facility should only be open to the public from 9am to 5pm and closed on Sundays to align with the other facilities in the County. Being closed on Sundays just like the Port Angeles Regional and Blue Mountain Transfer Station will limit the number of people hauling trash from farther locations, which will reduce emissions, as well as reduce potential litter.
4. Use of solid walls shall be incorporated in the design of the structure and within the landscaping to help minimize impacts of noise, lights and aesthetic impacts to residential properties and the public streets. In compliance with the standards of CCC 33.20.060(3) the entire facility is loading/unloading and storage of garbage and recycling, therefore screening will be required, which again supports the need for the facility to be entirely indoors. Solid walls are described for use to help minimize impacts of noise, lights and aesthetic impacts to residential properties, but should also be considered from the public streets since the facility is associated with the hauling and loading of garbage.

5. To mitigate the location of the recycling dumpster a new landscaping plan shall be submitted complying with the standards of CCC 33.20.030(6) in addition to the minimum landscaping standards of CCC 33.53 that should address the location, orientation, and access of the proposed recycling dumpster which should be shielded from Business Park Loop.
6. A lighting plan shall be submitted and approved prior to the issuance of a building permit to ensure no off-site glare to the street or adjacent properties. All outdoor lighting shall be directed downward and shielded to prevent glare and light trespass onto neighboring properties and roads. The lighting plan shall be prepared by a qualified professional and note the location, type, and intensity of lighting. It shall also demonstrate how location, type, and mitigation measures (ie. shielding) will prevent glare and light trespass. The approved plan must be implemented and any significant changes to the number of lighting fixtures, location, and intensity will require an updated lighting plan to be approved by Clallam County.
7. In order to address Impacts to the Olympic Discovery Trail, a landscaping plan shall be submitted that shows the proposed landscaping along the trail outside of the easement, along the entire length of the trail, since no crossing of the trail will be allowed between the two parcels.
8. A new Traffic Study with 6-year and 20-year projection, assuming reasonable buildout, for the intersection at the north of Business park Loop and Carlsborg Road, including data from Savannah Lane and Village Lane to the west shall be provided.

Nothing in this Checklist review or associated MDNS shall preclude further review or conditioning of future

I have reviewed and considered the referenced proposal, the environmental checklist, agency comments, and other available material. I hereby recommend a **Mitigated Determination of Non-Significance (MDNS)**.

  
\_\_\_\_\_  
Donella Clark, Principal Planner

12/30/2022  
Date