



TO: Clark County Councilors
FROM: Steve Morasch, Planning Commission Chair
PREPARED BY: Gary Albrecht, AICP, Planner III
DATE: November 27, 2018
SUBJECT: CPZ2018-00001 YACOLT MOUNTAIN SURFACE MINING
OVERLAY EXPANSION FOR COMPREHENSIVE GROWTH
MANAGEMENT MAP AMENDMENT

PLANNING COMMISSION RECOMMENDATION

On August 2, 2018, the Planning Commission voted (5/2) to deny the applicant's request to expand the surface mining overlay. Based on review of the record and substantial public comment, the Planning Commission majority of denial votes were because they do not believe that the criteria for the policy/text amendments were met.

PROPOSED ACTION

The applicant is requesting to amend the comprehensive plan designation and zoning map to expand the surface mining overlay on parcel number 230301000 and a portion of parcel number 230061000 adjacent to the Yacolt Mountain Quarry [Exhibit 1].

BACKGROUND

Parcel numbers 230061000 and 230301000 were acquired by the applicant in 2016. The parcels are zoned Forest-80 (FR-80) with a Forest Tier I comprehensive plan designation. Parcel number 230061000 was logged by the previous owner. These properties are contiguous to parcel number 230067000 zoned Forest-80 (FR-80) and Surface Mining Overlay with a Forest Tier I comprehensive plan designation and Mining Overlay. This proposed amendment would extend the mining overlays to parcel 230301000 and a portion of parcel 230061000. (Legal description of the portion will be provided).

The applicant's narrative states that the purpose of this request is to provide additional land to be used as a storage site for the overburden of the existing Yacolt mining operation from parcel 230067000. The Surface Mining Overlay District under CCC40.250.022(C)(1)(b) allows for the short-term stockpiling of extracted materials and would require additional review and approval. Should the applicant seek to extract mineral resources on parcels 230301000 and 230061000, the applicant would need to comply with CCC40.250.022 and submit to further review and approval.

Counties planning under the Growth Management Act (GMA) are required to identify, designate, and protect mineral resource lands that are not already characterized by urban growth and that have long-term significance for the extraction of minerals [RCW 36.70A.170]. Clark County adopted a Surface Mining Overlay (SMO) map, code standards and mineral lands policies in 1994.

In October 2005, the Washington Department of Natural Resources Division of Geology and Earth Resources produced an aggregate resource inventory map of Clark County [Exhibit 2]. The updated



inventory identified parcel numbers 230061000 and 230301000 as a potential bedrock resource for which distribution, grade, and quality can be confidentially estimated from specific geologic evidence, limited sampling, and laboratory analysis. Identified resources may include economic, marginally economic, and subeconomic components that reflect various degrees of geologic certainty.

In 2009, the Washington Legislature amended RCW 36.70A.170 and provided additional guidelines for classifying and designating mineral resource lands.

In 2011, the Board appointed a Mineral Lands Task Force to make recommendations to the Surface mining overlay (SMO) map, comprehensive plan policies and development standards based on the new inventory map and GMA regulations. The task force forwarded a recommendation to expand the surface mining overlay to these two subject parcels [Exhibit 3].

In 2013, the Planning Commission considered the Mineral Lands Task Force recommendations and forwarded a recommendation of denial for these two subject parcels.

In 2014, the then Board of County Commissioners voted unanimously to deny the expansion of the Surface Mining Overlay to these two subject parcels due to concerns about topography, road access, and impacts on endangered species.

According to the Applicant's written narrative, "Previous consideration for the expansion of the mineral overlay in the Yacolt area in 2014 found mineral extraction and forestry to be incompatible uses. However, this is contrary to the county stance in 2002, where during a rezoning hearing for Yacolt Mountain Mine, the hearing examiner took the stance that mineral extraction and forestry are not incompatible uses because of post mining reclamation that would return the site to forestry use. Furthermore, under the county definitions of FR-80 and FR-1, mineral industries (including mineral extraction) are called out as being a compatible use for the designations and is protected under the zoning and comprehensive plan designations."

Since 2014, the applicant has purchased the two adjacent parcels to the existing mine and has improved the previous narrow gravel road.

In 2017, the applicant submitted a preliminary application for a temporary storage of topsoil and pad for staging aggregate products on parcel 230061000, PAC2017-00041. The pre-application indicated that a traffic study is not required. SEPA will be required, and the site plan for Yacolt Mountain quarry will need to be revised. Assuming a successful comp plan map and zoning map, the applicant will apply for the identified permits, Conditional Use, Site Plan, SEPA, and Geohazard.

GENERAL INFORMATION:

Parcel Numbers: 230610000 and 230301000

Location: The site is located on 36400 NE 10th Avenue, in Ridgefield, WA, 98642 to the east of NE Kelly Road, on the north side of NE Lucia Falls Road.

Area: Approximately 107 acres

Owner(s): Storedahl Properties, LLC

Existing land use:

Site: Forest Tier I (FR-80)
North: Forest Tier I and Mining Overlay, (FR-80, Surface Mining Overlay)
South: Forest Tier I (FR-80)
East: Forest Tier I (FR-80)
West: Forest Tier I (FR-80)

SUMMARY OF PUBLIC INVOLVEMENT PROCESS

Sixty-day notice notification was sent to the Department of Commerce on May 31, 2018, under RCW 36.70A.106. A Notice of Determination of Non-Significance and SEPA Environmental Checklist was published in the Columbian newspaper on July 13, 2018. A legal notice was published for the Planning Commission hearing on August 2, 2018. A notice of application and hearing was posted on the property on July 24, 2018. Public Hearing Notice was published in the Reflector and the Columbian newspapers on Wednesday, July 18, 2018. A postcard was mailed, and hearing notices posted on July 13, 2018.

All public comments are included in the hearing binder.

In the beginning of November, postcards were mailed to nearby property owners indicating the hearing date, time and location. On November 6, 2018, a legal notice was published for the County Council Hearing. On November 9, 2018, hearing notices were posted on the property.

APPLICABLE CRITERIA, EVALUATION AND FINDINGS

CRITERIA FOR ALL MAP CHANGES

- A. The proponent shall demonstrate that the proposed amendment is consistent with the Growth Management Act (GMA) and requirements, the countywide planning policies, the Community Framework Plan, Comprehensive Plan, City Comprehensive Plans, Applicable Capital Facilities Plans, and official population growth forecasts. [CCC 40.560.010(G)(1)].**

Growth Management Act (GMA)

The GMA goals set the general direction for the county in adopting its framework plan and comprehensive plan policies. The GMA lists thirteen overall goals in RCW 36.70A.020 plus the shoreline goal added in RCW 36.70A.480(1). The goals are not listed in order of priority. The GMA goals that apply to the proposed action are Goals 5, 8 and 10.

Goal 5 Economic Development. "Encourage economic development throughout the state that is consistent with the adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities."
[RCW 36.70A.020(5)].

Goal 8 Natural Resource Industries. "Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of

productive forestlands and productive agricultural lands, and discourage incompatible uses.” [RCW 36.70A.020(8)].

Goal 10 Environment. “Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.” [RCW 36.70A.020(10)].

Finding: In Goal 5, the proposed expansion of the surface mining overlay would help meet future aggregate demands for building homes and roads in the county, which in turn would support economic development by creating employment opportunities in the mining and construction sectors.

In Goal 8, it indicates maintaining and enhancing natural resource-based industries. Goal 8 does not specifically include mining as a natural resource-based industry. However, it meets the Mineral resource lands classification criteria established in WAC 365-190-070 (3). Goal 8 also encourages the conservation of productive forestlands and discourages incompatible uses. One of the proposed parcels, parcel number 230061000 has recently been logged and is no longer a productive forestland. Parcel number 230301000 includes likely productive forestlands containing an existing private road to the current mine.

In Goal, operating equipment will be equipped with requisite mufflers and emission control exhaust systems to protect air quality indicated. The SEPA has indicated that an unnamed seasonal stream is located offsite and north of the proposed mineral overlay. Drainage flows to a wetland located at the eastern edge of parcel 230061000 outside and east of the expanded mineral overlay. The existing permitted mine plan references a 150 foot buffer from the headwaters of the unnamed stream. The applicant will have to comply with the stream requirements in Clark County Code Chapter 40.440. The SEPA has also indicated the ground water will not be drawn from a well for drinking water or other purposes, and waste material will not be discharged into the ground from septic tanks or other sources. The applicant would need to comply with the Surface Mine Reclamation Program to restore vegetation, soil stability, and proper water conditions after mining takes place. The proposed amendment protects the environment as discussed in Goal 10.

Community Framework Plan

The Community Framework Plan (Framework Plan) provides guidance to local jurisdictions on regional land use and service issues. The Framework Plan encourages growth in centers, urban and rural, with each center separate and distinct from the others. The centers are oriented and developed around neighborhoods to allow residents to easily move through and to feel comfortable within areas that create a distinct sense of place and community. Community Framework Plan policies applicable to this proposal include the following:

Goal 3.0 states that the Rural and Natural Resource element “ensures the conservation of agricultural, forest, and mineral resource lands, and protect these lands from interference by adjacent uses...” [Framework Plan, Page 14].

The following Rural and Natural Resource policies apply to the proposed action:

- “3.1.2 The county and its jurisdictions at a minimum are to consider mineral resource lands based on WAC 365-190-070.
- 3.1.6 Establish standards for compatible land use on land designated for agriculture, forest and mineral resource uses.
- 3.1.8 Mineral, forestry and agricultural operations are to implement best management practices to minimize impacts on adjacent property.” [Framework Plan, page 15].

Goal 9.0 states that the Economic Development Element is to "...contribute to maintaining and improving the overall quality of life in the county." [Framework Plan, page 21].

"9.1.3 Encourage businesses which pay a family wage to locate in Clark County." [Framework Plan, page 21].

Finding: Although Goal 3.0 states that the Rural and Natural Resource element "ensures the conservation of agricultural, forest, and mineral resource lands, and protects these lands from interference by adjacent uses," WAC 365-190-070(2) states that the county "must identify and classify mineral resource lands from which the extraction of minerals occurs or can be anticipated...to assure availability of minerals for future uses, and to not inadvertently preclude access to available mineral resources due to incompatible development. Other proposed land uses within these areas may require special attention to ensure future supply of aggregate and mineral resource material, while maintaining a balance of land uses."

The subject parcels are located adjacent to an area with the surface mining overlay designation. The proposed expansion of the surface mining overlay would increase the supply of existing aggregate resources by 107 acres to meet the needs of development of homes and roads in Clark County. The mineral operation would provide employment opportunities in the mining and construction sectors. Best management practices would be established and implemented through the conditional use permit process that would follow the proposed designation as a Surface Mining Overlay. In addition, the applicant would need to comply with the Surface Mine Reclamation Program to restore vegetation, soil stability, and proper water conditions after mining takes place. The proposal is consistent with the policies in the Community Framework Plan.

Countywide Planning Policies (CWPP)

The GMA, under RCW 36.70A.210, requires counties and cities to collaboratively develop Countywide Planning Policies (CWPP) to govern the development of comprehensive plans. The WAC 365-196-305(1) defines "the primary purpose of CWPP is to ensure consistency between comprehensive plans of counties and cities sharing a common border or related regional issues. Another purpose of the CWPP is to facilitate the transformation of local governance in the urban growth areas, typically through annexation to or incorporation of a city, so that urban governmental services are primarily provided by cities and rural and regional services are provided by counties."

Policy 3.0 in the Rural and Natural Resource element states the following:

"3.0.1 The county shall recognize existing development and provide lands, which allow rural development in areas, which are developed or committed to development of a rural character." [CWPP, page 89]."

"Mineral Lands

Goal: To protect and ensure appropriate use of gravel and mineral resources of the county and minimize conflict between surface mining and surrounding land uses."

- 3.6.1 Support the conservation of mineral lands for productive economic use by identifying and designating lands that have long-term commercial significance for mineral extraction and that are not already characterized by urban growth.
- 3.6.2 Designate mineral resource lands based on the following:
 - Geological, environmental and economic factors;
 - surrounding land uses, zoning and parcel size; and
 - the suitability of public access roads to be used as haul roads.
- 3.6.3 Ensure that mineral extraction and processing operations minimize and mitigate any significant adverse impacts on water, fish, wildlife and nearby land uses.

- 3.6.4 Ensure that the use of adjacent lands will not interfere with the continued use of designated Mineral Resources lands for the extraction of minerals in the accustomed manner and in accordance with best management practices.
- 3.6.5 Establish notification standards whereby developments on lands in the vicinity of designated mineral resource lands are given notice that they are locating in or adjacent to a potential mining area.
- 3.6.6 The Surface Mining Overlay shall not be designated within Rural (R) zones except to allow the expansion of an existing mining site.
- 3.6.7 Surface mining other than Columbia River dredging shall not occur within any 100-year floodplain except for projects with an approved Habitat Conversation Plan.” [2016 Plan, pages 95- 96].

Finding: The proposed plan map amendment and expansion of the surface mining overlay recognizes existing development in the rural area. The parcels are zoned FR-80 and are surrounded by parcels zoned FR-80 minimizing impacts to Rural zones. The subject parcels have been identified on the Washington Department of Natural Resources Division of Geology and Earth Resources inventory map of Clark County. The expansion of the Surface Mining Overlay for the subject parcels would support the conservation of mineral lands for productive economic use.

This proposal would provide an additional supply of aggregate resources that is adjacent to an existing supply of aggregate. Expansion of the surface mining overlay would extend the life of the current mining operation and maximize its use and effectiveness. Environmental resources will be projected through the a future conditional use permit, DNR’s Reclamation Permit, and DOE’s Sand and Gravel Permit. The proposed amendment is consistent with Countywide Planning Policies.

Comprehensive Growth Management Plan 2015-2035 (2016 Plan)

The 20-Year Comprehensive Growth Management Plan contains many policies that guide urban form and efficient land use patterns. The most relevant goals and policies applicable to this application are as follows:

“Goal: Compatible with maintaining rural character and rural (level of service) (services), ensure that lands outside of urban growth areas are viable places to live and work.” [2016 Plan, page 90].

- “3.1.1 Clark County shall maintain and protect the character of rural lands defined as those lands outside of urban growth areas by promoting:
 - Economic development activities consistent with the preservation of rural character;
 - Agriculture, forestry and mining activities...
- 3.1.2 Land use designations shown on the Clark County Comprehensive Land Use Map includes areas that are in rural character and meet one or more of the following criteria:
 - Generally characterized by a larger lot size;
 - Do not require urban levels of public services;
 - Opportunities exist for farming and mineral activities;
 - The area is contiguous with other rural lands or can serve as a buffer between large-lot residential development and resource activities or urban areas;
 - The area is not needed to provide capacity for population or employment growth in the 20-year forecast; and,

- The area has outstanding scenic, historic, environmental, resource or aesthetic values.” [2016 Plan, page 91].

“Goal: To maintain and enhance the conservation of productive forestlands and discourage incompatible uses associated with forestry activities.

3.4.2 Primary land use activities on forest lands are commercial forest management, agriculture, mineral extraction, public recreation uses and other non-forest related economic activities relying on forest lands.” [2016 Comp Plan, page 94].

“Goal: To protect and ensure appropriate use of gravel and mineral resources of the county and minimize conflict between surface mining and surrounding land uses.

3.6.1 Support the conversion of mineral lands for productive economic use by identifying and designating lands that have long-term commercial significance for mineral extraction and that are not already characterized by urban growth.” [2016 Plan, page 96].

Finding: The proposed amendment to expand the surface mining overlay would expand the lifespan of the existing mining operation by providing storage for the overburden of the existing mining operation on adjacent parcels. The proposed amendment would also add lands adjacent to the existing surface mining overlay that are currently being mined in accordance with Clark County code and help maximize the mines use and effectiveness. The subject parcels have minerals in commercially viable quantities and could be mined using the same public and private facilities that support the existing mining operation. The proposal would support the existing economic use, essentially extending the life of the current mine and help maximize its use and effectiveness. The proposal is consistent with surrounding land uses.

Conclusion: The proposed amendment demonstrates consistency with the Growth Management Act (GMA) and requirements, the countywide planning policies, the Community Framework Plan, Comprehensive Plan, City Comprehensive Plans, Applicable Capital Facilities Plans, and official population growth forecasts. Criterion A has been met.

B. The proponent shall demonstrate that the designation is in conformance with the appropriate locational criteria identified in the plan and the purpose statement of the zoning district. [CCC 40.560.010(G)(2) and CCC 560.020.(G)].

“Surface Mining Overlay. This designation is implemented with an overlay zone and recognizes existing mining areas and is to allow for the future mining of minerals in an economically feasible way. Other land use controls which flow from 20-Year Plan policies or state or federal law apply to development proposals that are identified on zoning or other adopted maps but are not specifically identified on the 20-Year Plan Map”. [2016 Plan, page 38].

CCC40.250.022 Surface Mining Overlay District states that “the purpose of the surfacing mining overlay district is to ensure the continued availability of rock, stone, gravel, sand, earth and mineral products without disrupting or endangering adjacent land uses, while safeguarding life, property and the public welfare”.

CCC 40.210.010 Forest, Agriculture and Agriculture-Wildlife Districts (FR-80, FR-40, AG-20, AG-WL) states that “the purpose of the Forest 80 district is to maintain and enhance resource-based industries, encourage the conservation of productive forest lands and discourage incompatible uses consistent with the Forest 1 policies of the comprehensive plan. The Forest 80 district applies to lands which have been designated as Forest Tier 1 on the comprehensive

plan. Nothing in this chapter shall be construed in a manner inconsistent with the Washington Forest Practices Act.”

Finding: The proposed comprehensive plan map amendment and expansion of the surface mining overlay is consistent with the surrounding land uses and is in conformance with both the locational criterion in the comprehensive plan and the purpose of the proposed zoning districts. The proposed site is suitable because it meets the locational criterion, adjoins an existing surface mine and can provide needed mineral resources without harm to environmental resources or surrounding properties. There are no other appropriately designated alternative sites in the vicinity and there is not sufficient area within the existing surface mining overlay to provide for the long-term mineral resources needs of the County, see map of existing mines [Exhibit 4]. The study of permitted Aggregate Reserves of Clark County, Washington indicates mines that are currently permitted have limited and declining quantities of quality material, and in some cases are subject to conditions of approval that significantly limit the utilization of available mineral resources [Exhibit 5]. It identifies a strong need for additional resource designation.

The zoning district purpose statement is to enhance and allow resource based industries. RCW 36.70A.170 demonstrates that mineral resource lands is a resourced-based industry. Clark County Comprehensive Growth Management Plan, Chapter 3 Rural and Natural Resource Element include Mineral Lands. “The Growth Management Act (RCW 36.70A.040 (3)(b)) requires Clark County and each city within it to designate mineral resource lands and to adopt development regulations conserving those resource lands from which the extraction of minerals occurs or can be anticipated. Surface Mining is allowed in the Surface Mining Overlay District, Clark County Code 40.250.022.

Conclusion: The proponent has demonstrated that the proposed SMO designation is in conformance with the appropriate locational criteria identified in the plan and the purpose statement of the zoning district. Criterion B has been met.

C. The map amendment or site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity. [CCC 40.560.010(G)(3)].

Finding: The applicant submitted a study entitled “Summary: Study of Permitted Aggregate Reserves of Clark County, Washington” [Exhibit 5] and a map of permitted mine locations [Exhibit 4]. The study indicates that the future supply of aggregate resources in Clark County must be expanded to meet demand because existing mines do not have sufficient mineral resources. The applicant also indicates that there are no other appropriately designated alternative sites in the vicinity and that there is not sufficient area within the existing surface mining overlay to provide long-term mineral resource needs of the county. Dave Norman, Washington State DNR Geologist, has reviewed the applicant’s “Study of Permitted Aggregate Reserves of Clark County” and concluded that the study contains sound science and engineering satisfying their study request.

The two parcels are suitable for the proposed designation because it adjoins an existing surface mining overlay and would allow the existing mining operation to continue to provide mineral resources to meet the construction needs of the county. There is not sufficient area within the existing surface mining overlay to continue the existing mining operations without expanding the overlay. The applicant’s narrative states that “mines that are currently permitted have limited and declining quantities of quality material and in some cases are subject to conditions of approval that significantly limit the utilization of available mineral resources”.

Yacolt Mountain consists of quartz diorite that has a history of use as crushed aggregate in Clark County. The Rock Aggregate Resource Lands Inventory Map for Clark County, Washington (2005) mapped Tertiary diorite and quartz diorite in northeast Clark County at Buncombe Hollow Creek, Chelatchie Prairie, Dunegun Mountain and Yacolt Mountain. According to the Aggregate Rock Map, Buncombe Hollow is 613 acres and hypothetically contains rock, it is not included in the SMO. Chelatchie Prairie is about 225 acres identified on a map; partial inclusion in SMO is roughly 113 acres. Dunegun Mountain is about 510 acres that hypothetically contains rock, but is not mapped or included in the SMO. However, these lands are not adjacent to the existing mining operation.

Conclusion: The proposed map amendment is suitable for the proposed designation (Surface Mining Overlay with Forest 80 (FR-80) zoning) as it is adjacent to an existing surface mining overlay and the two subject parcels can provide needed mineral resources for future mining. There are no other appropriately designated alternative sites in the vicinity for mining operations and there is not sufficient area within the existing surface mining overlay to provide for the long-term mineral resource needs of the County. Criterion C has been met.

D. The plan map amendment either; (a) responds to a substantial change in conditions applicable to the area within which the subject property lies; (b) better implements applicable comprehensive plan policies than the current map designation; or (c) corrects an obvious mapping error. [CCC 40.560.010(G)(4)].

Finding: The proposal (a) responds to a substantial change in conditions because it would provide additional land to be used as a storage site for the overburden of the existing mining operation on parcel 230067000. Once the material on parcel 230067000 is exhausted, the materials on 230061000 and 230061000 would be mined as well.

Conclusion: The proposed change demonstrates a substantial change in conditions applicable to the area within which the subject property lies. Criterion D has been met.

E. Where applicable, the proponent shall demonstrate that the full range of urban public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection and schools. Adequacy of services applies only to the specific change site. [CCC 40.560.010(G)(5)].

Finding: The subject parcels are not in the urban area and do not require the full range of urban facilities and services; this criterion is not applicable. The transportation analysis demonstrates that expanding the Surface Mining Overlay (SMO) is consistent with county transportation policies. The proposed land use change would not significantly impact the transportation system. All of the study area intersections are projected to operate at acceptable levels of service in the 2035 "Existing Zoning Build-Out" and 2035 "Proposed Zoning Build-Out." Staff has worked with Washington Department of Transportation, and they do not see any impacts or mitigation to SR 503 at this time. See the attached traffic impact analysis by Laurie Lebowsky, Clark County Community Planning Transportation Planner to review the findings [Exhibit 6].

Conclusion: A full range of urban public facilities and services do not apply to the applicant's rural proposal of adding an SMP to two parcels adjacent to an existing mine. The existing transportation system is able to accommodate this proposed comprehensive plan and zone change. Criterion E has been met.

F. Additional Criteria for Surface Mining Overlay Changes.

1. Designation of additional areas with the surface mining overlay shall only occur if:
 - a. The designation criteria in the comprehensive plan have been met;
 - b. The quantity and characteristics of the resource including the size of the deposit, the depth of overburden, the distance to market, and the cost of transport and resource availability in the region suggest that mining is economically viable; and
 - c. At least sixty percent (60%) of the area within one thousand (1,000) feet of the proposed mineral resource land is characterized by parcels of five (5) acres or larger. **[CCC 40.560.010(S)].**

Finding: Regarding F.1.a, the comprehensive plan designation criteria have been met as explained above in Criterion A through E. Criteria F.1.b is addressed in the study of permitted Aggregate Reserves of Clark County, Washington [Exhibit 5]. The buried bedrock is likely quartz diorite based on recent mapping by Washington State Department of Natural Resource Rock Aggregate Resource Lands Inventory Map for Clark County, October 2005. [Exhibit 2] showing the quartz diorite located along a stream channel southeast of the proposed mineral overlay expansion as well as at the top of Yacolt Mountain, which covers a range in elevations from about 700 to 1,774 feet above mean sea level [Exhibit 8]. The applicants narrative indicates that the depth of overburden is expected to be consistent with what is found on the adjacent active mine property at 15 feet. The applicant's narrative states that "The market and transportation costs would be commercially reasonable as established by the fact that the expansion would be incorporated within the existing and adjacent mine. Distance to market ranges from 0-15 miles with transportation costs of approximately \$7 per ton, both of which are established as economically viable for mining operations as previously noted." Finally, the area within 1,000 feet of the parcels to be included in the expansion is characterized by 5 acre or larger parcels. See attached map showing actual parcel size of the surrounding properties [Exhibit 7].

2. Removal of the surface mining overlay shall only occur if one (1) of the following conditions is met:
 - a. The mineral resources have been depleted;
 - b. There is evidence that the mining of the mineral resource is not economically feasible based on the factors listed in Section 40.560.010(S)(1)(b);
 - c. Environmental or access constraints make it impractical to mine the resource; or
 - d. The area has been brought into an urban growth boundary or adjacent land uses or developments are incompatible with mineral extraction.

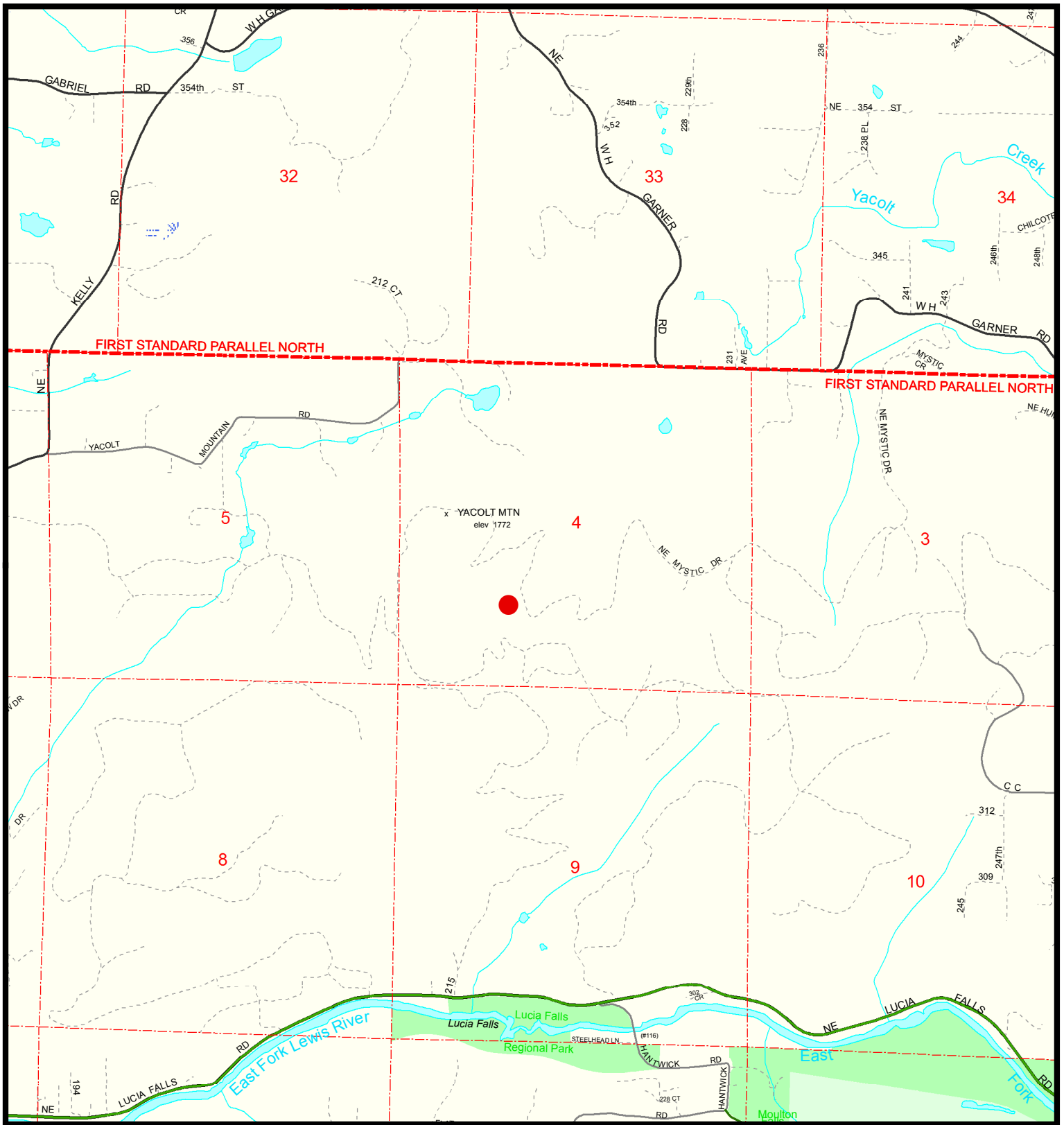
Finding: This criterion is not applicable. This proposal is a request to expand the surface mining overlay to two adjacent parcels, not a request to remove the surface mining overlay.

Conclusion: The applicant has demonstrated that the proposal is consistent with the additional criteria for designating surface mining overlay changes. Criterion F is met.

RECOMMENDATION AND CONCLUSIONS

Based on the information and the findings presented in this report and in supporting documents, the Planning Commission forwards a recommendation of **DENIAL** to Clark County Councilors. The following table lists the applicable criterion and summarizes the findings for CPZ2018-00001.

COMPLIANCE WITH APPLICABLE CRITERIA		
Criteria for Policy/Text Amendments	Criteria Met?	
	Staff Report	Planning Commission Findings
A. Consistency with GMA & Countywide Policies	YES	NO
B. Conformance with Locational Criteria	YES	NO
C. Site Suitability and Lack of Appropriately Designated Alternative Sites	YES	NO
D. Amendment Responds to Substantial Change in Conditions, Better Implements Policy, or Corrects Mapping Error	YES	NO
E. Adequacy/Timeliness of Public Facilities and Services	YES	NO
F. Additional Criteria for Surface Mining Overlay Changes	YES	NO
Recommendation:	APPROVE	DENY



General Location Map

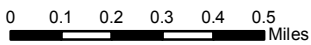
Printed on: September 29, 2017

Account No: 230061000, 230301000, 230067000
 Owner: STOREDAHL PROPERTIES LLC
 Address: 2233 TALLEY WAY
 C/S/Z: KELSO, WA 98626

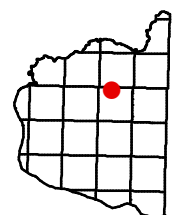


Geographic Information System

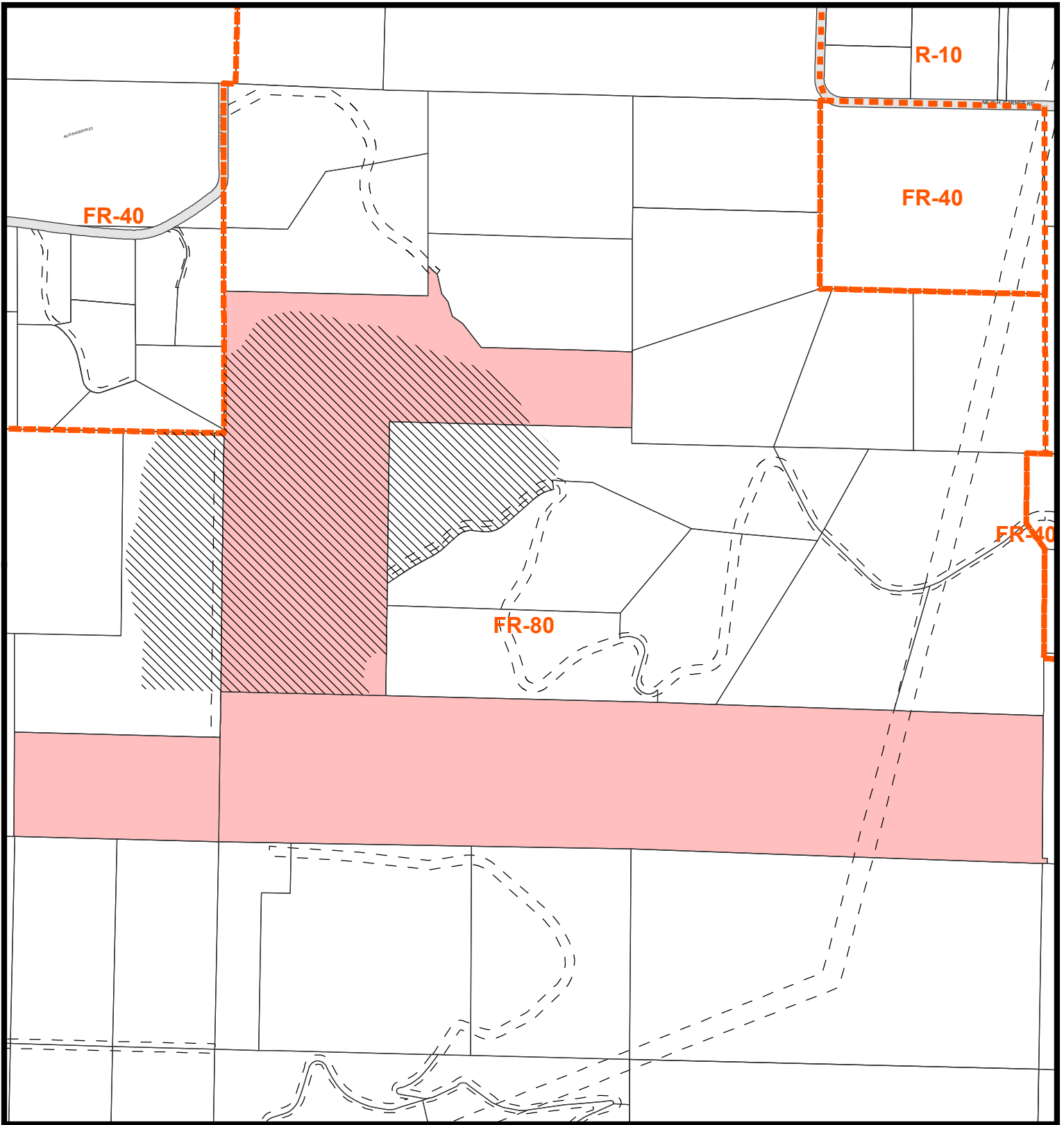
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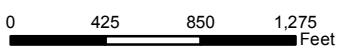
● Subject Property Location



Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.



Geographic Information System
1:10,300



Zoning Designation

Account No: 230061000, 230301000, 230067000

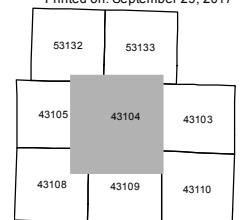
Owner: STOREDAHL PROPERTIES LLC

Address: 2233 TALLEY WAY

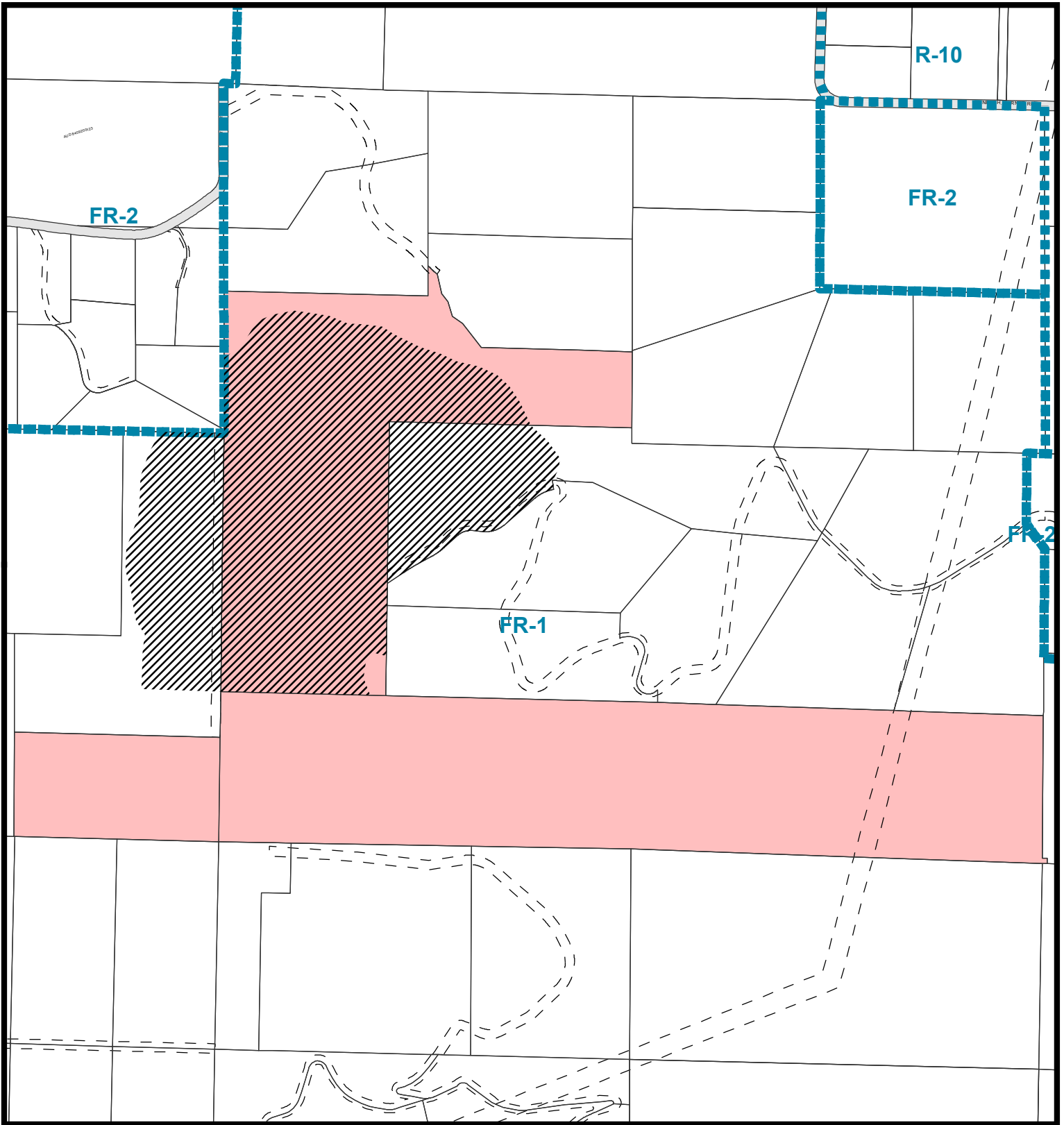
C/S/Z: KELSO, WA 98626

- Subject Parcel
- Public Road
- Transportation or Major Utility Easement
- Zoning Boundary
- Urban Holding - 10 (UH-10)
- Urban Holding - 20 (UH-20)
- Urban Holding - 40 (UH-40)
- Surface Mining Overlay District

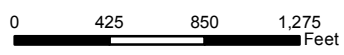
Printed on: September 29, 2017



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Geographic Information System
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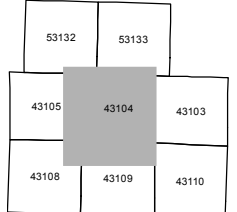
Developer's GIS Packet Page 7 of 18

Comprehensive Plan Designation

Account No: 230061000, 230301000, 230067000
 Owner: STOREDAHL PROPERTIES LLC
 Address: 2233 TALLEY WAY
 C/S/Z: KELSO, WA 98626

- Subject Parcel
- Public Road
- Transportation or Major Utility Easement
- Comprehensive Plan Boundary
- Urban Reserve
- Industrial Reserve
- Railroad Industrial Reserve
- Mining
- Rural Center Mixed Use
- Columbia River Gorge Scenic Area

Printed on: September 29, 2017

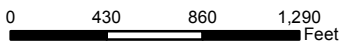


Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.



Geographic Information System

1:10,300



2016 Aerial Photography

Account No: 230061000, 230301000, 230067000

Owner: STOREDAHL PROPERTIES LLC

Address: 2233 TALLEY WAY

C/S/Z: KELSO, WA 98626

Proposed Development Area

Printed on: September 29, 2017

53132	53133
43105	43104
43108	43109
	43103
	43110

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