

SEPA 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.

A. Background

1. Name of proposed project, if applicable:
Update effective date for federal air regulations referenced or adopted by reference in ORCAA's regulations
2. Name of applicant:
Olympic Region Clean Air Agency (ORCAA)
3. Address and phone number of applicant and contact person:
2940 Limited Lane NW

Olympia, WA 98502
Contact: Mark Goodin
Contact Phone #: (360) 539-7610 ext 108

4. Date checklist prepared:
September 19, 2019
5. Agency requesting checklist:
Olympic Region Clean Air Agency
6. Proposed timing or schedule (including phasing, if applicable):
 - *Public Hearing scheduled for November 13, 2019, at ORCAA's office in Olympia located at 2940 Limited Lane NW.*
 - *Date of intended adoption is November 13, 2019.*
 - *Provided adoption date is met, effective date of regulation amendments would be late December 2019.*

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

Yes. ORCAA will apply to the U.S. EPA for delegation of authority to directly implement and enforce the federal regulations currently adopted by reference in ORCAA's regulations. The application will be filed immediately upon final adoption of the proposed update to the federal regulation reference date in ORCAA regulations. Delegation of authority to directly implement and enforce the federal regulations will eliminate the situation where both EPA and ORCAA have authority and responsibility to implement and enforce the most recently adopted versions of federal regulations. Provided delegation of authority to ORCAA, EPA would take on an oversight role and ORCAA would be the regulatory authority over adopted federal regulations.

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

None.

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.

No.

10. List any government approvals or permits that will be needed for your proposal, if known.
ORCAA's Board of Directors must approve the proposed change following a public hearing. No approval is needed from any other agency. Related to this, ORCAA will apply to the U.S. EPA for delegation of authority to directly implement and enforce the latest versions of same federal regulations. EPA's delegation of authority to directly implement and enforce adopted federal regulations is independent of and has no bearing on whether ORCAA can update the effective date for adopted federal air regulations.

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.)

Olympic Region Clean Air Agency (ORCAA) is proposing to update the effective date stated in ORCAA Rule 1.11 for federal air standards adopted by reference in ORCAA's regulations. ORCAA's Rule 1.11, Federal Regulation Reference Date, currently states an effective date of July 1, 2018 for any federal regulation referenced in ORCAA's regulations. ORCAA's proposal is to change this date to July 1, 2019. Date references in ORCAA Regulations, Appendix A will be removed.

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.

ORCAA's regulations apply to stationary sources of air pollution within ORCAA's six county jurisdiction consisting of Clallam, Grays Harbor, Jefferson, Mason, Pacific and Thurston counties.

B. ENVIRONMENTAL ELEMENTS

1. Earth

Does not apply. The proposed project involves amending ORCAA's Rule 1.11.

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

Does not apply.

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

Does not apply.

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.

Does not apply.

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

Does not apply.

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.

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

2. Air

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

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.

Does not apply.

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

Does not apply.

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

Does not apply.

3. Water

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

a. Surface Water:

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.

Does not apply.

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.

Does not apply.

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.

Does not apply.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.
Does not apply.

5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.
Does not apply.

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.
Does not apply.

b. Ground Water:

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

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 general description, purpose, and approximate quantities if known.
Does not apply.

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: 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.
Does not apply.

c. Water runoff (including stormwater):

Does not apply. The proposed project involves adopting in ORCAA's local regulations federal air regulations that already apply.

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.
Does not apply.

2) Could waste materials enter ground or surface waters? If so, generally describe.
Does not apply.

3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.
Does not apply.

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

Does not apply.

4. Plants

Does not apply. The proposed project involves adopting in ORCAA's local regulations federal air regulations that already apply.

- 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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

5. Animals

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

- a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbirds, other:

mammals: deer, bear, elk, beaver, other:

fish: bass, salmon, trout, herring, shellfish, other _____

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

6. Energy and Natural Resources

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

- 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.

Does not apply.

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

Does not apply.

- 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:

Does not apply.

7. Environmental Health

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.

Does not apply.

- 1) Describe any known or possible contamination at the site from present or past uses.
- 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.
- 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.
- 4) Describe special emergency services that might be required.
- 5) Proposed measures to reduce or control environmental health hazards, if any:

- b. Noise

Does not apply.

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

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.

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

8. Land and Shoreline Use

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

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.

Does not apply.

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

Does not apply.

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:

c. Describe any structures on the site.

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

9. Housing

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

10. Aesthetics

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

11. Light and Glare

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

12. Recreation

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

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

Does not apply.

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

Does not apply.

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

Does not apply.

13. Historic and cultural preservation

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

- 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.

Does not apply.

- 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.

Does not apply.

- 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.

Does not apply.

- 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.

Does not apply.

14. Transportation

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

- 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.
Does not apply.
- 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?
Does not apply.
- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?
Does not apply.
- d. 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).
Does not apply.
- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.
Does not apply.
- f. 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?
Does not apply.
- g. 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.
Does not apply.
- h. Proposed measures to reduce or control transportation impacts, if any:
Does not apply.

15. Public Services

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

- 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.
Does not apply.
- b. Proposed measures to reduce or control direct impacts on public services, if any.
Does not apply.

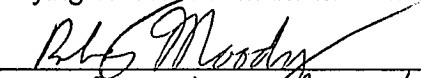
16. Utilities

Does not apply. The proposed project involves changing the effective date stated in Rule 1.11 for federal regulations that already apply.

- a. Circle utilities currently available at the site:
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,
other _____
Does not apply.
- d. 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.
Does not apply.

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the
lead agency is relying on them to make its decision.

Signature: 
Name of signee Robert Moody
Position and Agency/Organization Compliance Manager
Date Submitted: Sept 19, 2019

D. supplemental sheet for nonproject actions

(IT IS NOT NECESSARY to use this sheet 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 project involves changing the effective date for federal regulations referenced or adopted by reference in ORCAA Rule 1.11. Because these federal regulations already apply, the proposal will not increase any discharges to the environment. The proposal will likely simplify and improve compliance with the federal air regulations adopted, which may, indirectly, result in decreases in air pollutant emissions.

Proposed measures to avoid or reduce such increases are:

Does not apply.

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

The proposal will not affect plants, animals fish or marine life because increases in discharges and emissions are not a consequence of the proposal.

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

Does not apply.

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

The proposal will not deplete energy or natural resources because the federal regulations referenced or adopted by reference in ORCAA's regulations already apply.

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

Does not apply.

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 proposal will not have any affect on environmentally sensitive areas or areas designated for governmental protection because the federal regulations referenced or adopted by reference in ORCAA's regulations already apply.

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

Does not apply.

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

The proposal will not have any affect on shoreline use because the federal regulations referenced or adopted by reference in ORCAA's regulations already apply.

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

Does not apply.

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

The proposal will not have any affect on transportation or public services or utilities because the federal regulations referenced or adopted by reference in ORCAA's regulations already apply.

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

Does not apply.

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

ORCAA's proposal to change the effective date of federal air regulations referenced or adopted by reference in it's regulations does not conflict with any local, state or federal laws or requirements for protection of the environment because the federal regulations referenced or adopted by reference in ORCAA's regulations already apply.

Attachment 1

SEPA Nonproject Review Form

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. The Nonproject Review Form (NPRF) is an optional tool to help the lead agency evaluate the environmental consequences of a nonproject proposal and to provide information to decision-makers and the public.

The NPRF cannot be used as a substitute for the environmental checklist, but may be attached as supplemental analysis. Applicable information in the NPRF can be referenced in the environmental checklist without having to repeat the information.

The NPRF is intended to be used concurrently with the development of a nonproject proposal. To achieve maximum effectiveness and efficiency the initial use of the form should begin at the time a nonproject proposal is being contemplated, i.e. upon identification that a plan, policy or rule is likely to be needed or is mandated.

The information and analysis in the NPRF should be updated as the proposal is developed. The number of revisions will depend on the complexity of the proposal. If the proposal is minor, one iteration of the NPRF may be sufficient. For more complex proposals, the NPRF should be revised as analysis is completed or key issues resolved.

If you are unfamiliar with the form, you should review all of the questions before providing any answers. This will help familiarize you with the questions and should avoid duplication of information. Please note that when a nonproject proposal is first contemplated, it is often premature to respond to some questions in the NPRF. Answers may also change as the proposal is developed and analysis is completed.

Attachment 1

NONPROJECT REVIEW FORM

DATE: September 19, 2019

COMPLETED BY: Robert Moody, (360) 539-7610 ext 106

PART I - FRAMEWORK

1) Background

a) Name of proposal, if any, and brief description.

Adopt Federal Air Standards into ORCAA's Regulations

b) Agency and contact name, address, telephone, fax, email

Olympic Region Clean Air Agency

2940 Limited Lane NW

Olympia, WA 98502

Contact: Mark Goodin

(360) 539-7610 ext 108

c) Designated responsible official

Francea L. McNair

ORCAA Executive Director

d) Describe the planning process schedule/timeline

- *Public Hearing scheduled for September 13, 2019, at ORCAA's office in Olympia located at 2940 Limited Lane NW.*

- *Date of intended adoption is September 13, 2019.*

- *Provided adoption date is met, effective date of regulation amendments would be late December 2019.*

e) Location - Describe the jurisdiction or area where the proposal is applicable.

(Attach map(s) if appropriate)

ORCAA's regulations apply to stationary sources of air pollution within Clallam, Grays Harbor, Jefferson, Mason, Pacific and Thurston counties.

f) What is the legal authority for the proposal?

Attachment 1

The Washington Clean Air Act (Chapter 70.94 RCW)

- g) Identify any other future nonproject actions believed necessary to achieve the objectives of this action.

ORCAA will apply to the U.S. EPA for delegation of authority to directly implement and enforce the same federal standards adopted by reference in ORCAA's regulations. The application will be filed immediately upon final adoption of the proposed ORCAA regulation revisions. Delegation of authority to ORCAA to implement and enforce the federal regulations directly will eliminate the current situation where both EPA and ORCAA have authority and responsibility to implement and enforce the federal regulations. Provided delegation of authority to ORCAA, EPA would take on an oversight role and ORCAA would be the regulatory authority over these federal standards.

2) Need and Objectives

- a) Describe the need for the action. (Whenever possible this should identify the broad or fundamental problem or opportunity that is to be addressed, rather than a legislative or other directive.)

The action is needed to enable ORCAA to enforce current versions of the federal regulations adopted in ORCAA's regulations.

- b) Describe the objective(s) of the proposal, including any secondary objectives which may be used to shape or choose among alternatives.

Establish ORCAA as the primary authority over implementing and enforcing the federal air regulations.

- c) Identify any assumptions or constraints, including legal mandates, which limit the approach or strategy to be taken in pursuing the objective(s).

ORCAA is the authority for implementing and enforcing the Washington Clean Air Act in its six-county jurisdiction.

- d) If there is no legislative or other mandate that requires a particular approach, describe what approaches could reasonably achieve the objective(s).

Not applicable.

3) Environmental Overview

Describe in broad terms how achieving the objective(s) would direct or encourage physical changes to the environment. Include the type and degree of likely changes such as the likely changes in development and/or infrastructure, or changes to how an area will be managed.

The proposal is not likely to direct or encourage physical changes to environment since the federal regulations referenced or adopted by reference in ORCAA's regulations already apply.

Attachment 1

4) Regulatory Framework

- a) Describe the existing regulatory/planning framework as it may influence or direct the proposal.

ORCAA's end objective to serve as the primary authority over the federal air regulations adopted will require approval by the U.S. EPA through a delegation process. Keeping the federal regulation reference date current in ORCAA's regulations is a prerequisite.

- b) Identify any potential impacts from the proposal that have been previously designated as acceptable under the Growth Management Act (GMA), chapter 36.70A RCW.

Impacts from the proposal are not expected to have any affect or conflict with acceptable impacts under the GMA.

5) Related Documentation

- a) Briefly describe any existing regulation, policy or plan that is expected to be replaced or amended as a result of the proposal. (Adequate descriptions in section 4.a may be referenced here, rather than repeated.)

Currently, ORCAA's regulations reference and adopt by reference federal regulations that were in effect as of July 1, 2018. This proposal will replace this federal regulation effective date with July 1, 2019.

- b) List any environmental documents (SEPA or NEPA) that have been prepared for items listed in 4.a. or that provide analysis relevant to this proposal. **Note:** Impacts with previous adequate analysis need not be re-analyzed, but should be adopted or incorporated by reference into the NPRF. Identify the:

- i) Type of document:
- ii) Lead agency and issue date:
- iii) Where copies can be viewed or obtained
- iv) The portions of the document applicable to the current proposal and briefly explain relevancy. Summarize the relevant impact assessment or, provide reference to discussion(s) in Part II that includes this information.

ORCAA has prepared an Environmental Checklist for this proposed regulation change. ORCAA will prepare a Determination of Nonsignificance (DNS). When available, the document will be available on ORCAA's web site at <http://www.orcaa.org>.

- c) List other relevant environmental documents/studies/models which have been identified as necessary to support decision making for this proposal.

There are no other environmental documents/studies/models to support decision making for this proposal.

6) Public Involvement (Optional)

Attachment 1

- a) Identify agencies with jurisdiction or expertise, affected tribes, and other known stakeholder groups whose input is likely to be specifically solicited in the development of this proposal.

None.

- b) Briefly describe the processes used or expected to be used for soliciting input from those listed. [Examples: ad hoc committees, tribal consultations, interagency meetings, public workshops or hearings, newsletters, etc.]

None. Because this proposal involves updating an existing effective date in ORCAA's regulations, input from other agencies was not solicited.

PART II – IMPACT ANALYSIS AND ALTERNATIVES

7) Affected Environment

Generally describe the existing environmental landscapes or elements (e.g., character and quality of ecosystem, existing trends, infrastructure, service levels, etc.) likely to be affected if the proposal is implemented. Include a description of the existing built and natural environment where future “on the ground” activities would occur that would be influenced by the nonproject proposal.

Note: When complete, this section needs to provide information on existing conditions for the elements of the environment discussed in sections 8 and 9. A list of both the built and the natural elements of the environment is found in WAC 197-11-444, and included at the end of this form.

8) Key Issue Assessment

List the identified key issues or areas of controversy or concern and include a brief statement of why each is a key issue. For each item listed:

- a) Identify alternative options or solutions for the objective or concern.
- b) Describe the environmental considerations/impacts relevant to each of the alternatives identified in 8.a.
- c) Describe reasonable mitigation of adverse impacts identified.
- d) Identify those alternatives to be carried forward for further analysis.
- e) Briefly describe why those alternatives rejected from further consideration were not carried forward.

The key issue that will be resolved by this proposal is to eliminate situations where ORCAA's regulations reference or adopt by reference older versions of the code of federal regulations that may have been revised since July 1, 2018.

Attachment 1

9) Proposed Nonproject Action or Alternative Actions

Describe a range of reasonable alternatives or the preferred alternative that will meet the objective(s). For each alternative, answer the following questions referring again to the list of the elements of the environment in WAC 197-11-444:

- a) If this alternative were fully implemented (including full build-out development, redevelopment, changes in land use, density of uses, management practices, etc.), describe where and how it would direct or encourage demand on or changes within elements of the human or built environment, as well as the likely affects on the natural environment. Identify where the change or affect or increased demand constitutes a likely adverse impact, and describe any further or additional adverse impacts that are likely to occur as a result of those changes and affects.
- b) Identify potential mitigation measures for the adverse impacts identified in 9.a and describe how effective the mitigation is assumed to be, any adverse impacts that could result from the use of the mitigation, and any conflict or concern related to the proposal objectives and/or key issues identified.
- c) Identify unavoidable impacts and those that will be left to be addressed at the project level.
- d) Describe how the proposal objectives will or will not be met if the impacts described in 9.c were to occur.

Note: Alternatives may be rejected at any point in the process if: they have no environmental benefit, are not within existing authority, are determined unfeasible, or do not meet the core objectives.

There are no identified alternatives that would meet the objectives of this proposal since the issue being resolved is to change the federal regulation effective date curenly stated in ORCAA 's regulations.

PART III – IMPLEMENTATION CONSIDERATIONS

10) Consistency of the proposal with other plans, policies and laws.

- a) Internal consistency - If there are internal inconsistencies between this proposal and your agency's previously adopted or ongoing plans and regulations, identify any strategies or ideas for resolving these inconsistencies.

No inconsistencies identified.

Attachment 1

- b) External consistency - If there are external inconsistencies between this proposal and adopted or ongoing plans and regulations of adjacent jurisdictions and/or other agencies, identify any strategies or ideas for resolving these inconsistencies.

No inconsistencies identified.

11) Monitoring and Follow-up

- a) Describe any monitoring that will occur to ensure the impacts were as predicted and that mitigation is effective, including responsible party, timing, and method(s) to be used.

On an annual basis, ORCAA's intent is to update the federal regulation reference date and renew delegation of adopted federal regulations through EPA. This will assure ORCAA has authority to enforce the most current federal air regulations adopted by the agency.

- b) Identify any plans or strategies for updating this proposed action based on deviation from impact projections or other criteria.

See response in 11a above.

WAC 197-11-444, Elements of the Environment

Natural Environment

a. Earth

Geology, Soils, Topography, Unique physical features, Erosion/enlargement of land area

b. Air

Air quality, Odor, Climate

c. Water

Surface water movement/quantity/quality, Runoff/absorption, Floods

d. Plants and animals

Habitat for and numbers or diversity of species of plants, fish, or other wildlife, Unique species, Fish or wildlife migration routes

e. Energy and natural resources

Amount required/rate of use/efficiency, Source/availability, Nonrenewable resources, Conservation and renewable resources, Scenic resources

Built Environment

a. Environmental health

Noise, Risk of explosion, Releases or potential releases to the environment affecting public health

b. Land and shoreline use

Relationship to existing land use plans and to estimated population, Housing, Light and glare, Aesthetics, Agricultural crops

c. Transportation

Transportation systems, Vehicular traffic, Waterborne, rail, and air traffic, Parking, Movement/circulation of people and goods, Traffic hazards

d. Public services and utilities

Fire, Police, Schools, Parks and other recreational facilities, Maintenance, Communications, Water/storm water, Sewer/solid waste, Other governmental services or utilities

Attachment 1