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September 3, 2015

Clark County Board of County Councilors
1300 Franklin, 6th Floor
Vancouver, WA 98666

Dear Councilors;

Thank you for the opportunity to provide La Center's comments on the Draft Supplemental Environmental Impact Statement. We appreciate the opportunity to coordinate with Clark County.

The City of La Center supports Alternative 3 because it will help us create local jobs at the I-5 Junction and because it will assist the La Center School District in building a new elementary school. Alternatives 1, 2 and 4 do not directly help La Center create new jobs and they alone will not prevent the City from falling short of the county-wide jobs to housing balance.

For the the record, The City of La Center offers the following technical comments to the Draft Supplemental Environmental Impact Statement (DSEIS):

- The DSEIS contains several mapping errors relating to La Center:
 - All of the jurisdiction maps within the draft SEIS use the La Center city limit boundaries for 2012 not 2015. Since the base map is wrong it should easy to fix the problem.
 - Figure 1-3a, Alternative 3 Comprehensive Plan and Zoning for UGA Expansion, the color on the La Center maps for the proposed 17-acre School District expansion is shown as Commercial rather than Public Facilities.
- Table 6-4, Land Use Designation Change by Area, states that La Center experienced a 500 acre change in its UGA due to a mapping 'discrepancy' relating to a changed water designation. We watched our UGA shrink significantly after 2007 because of a later court decision and because of a large annexation but are not aware of the water designation error.

We also offer the following substantive comments into the record on the DSEIS:

- Financial Burden. The draft DSEIS does not take a serious look at the financial cost of each alternative, particular infrastructure costs. The SEIS would be much stronger and would provide a better foundation for selecting a preferred alternative if it included at least a generalized

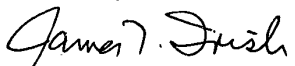


comparison of costs per alternative. Alternative 1 provides a starting point by using existing city/county CFPs. The DSEIS acknowledges Alternative 4 will produce more significant costs but unfortunately provides no insight into what those costs might be. For example, the DSEIS does not discuss in meaningful detail how any jurisdiction might respond to increased local transportation costs relating to the 120,000+ average daily trips 12,400 new homes in the rural area will generate.

- Groundwater. The ground water section (3.2), states that little has changed since 2007. How do we know that rural groundwater reserves are the same today? The DSEIS states that 95% of all potable water in Clark County comes from groundwater. If Alternative 4 will add 12,400 new homes outside of the UGAs where will that water come from, CPU and wells? The SEIS should examine the rural area's capacity for future ground water extraction. Given the anecdotal evidence that North County private wells are pumping deeper, Alternative 4 must consider groundwater extraction more thoroughly.
- Septic. Figure 2-3, page 2-6, illustrates clearly most county soils have "Very Limited" potential to accommodate septic systems. The ground water discussion says that there is a higher chance of groundwater contamination when you increase rural housing. This contamination could reasonably come from 12,400 new septic systems. The SEIS should take a deeper look at ground water sources, long term capacity and should measure that baseline against the greater risk of groundwater contamination that Alternative 4 will create.
- Soils. Section 2.1.1, page 2-2, states there has been little change in soil conditions since 2007. Figure 2-1, Soils Capabilities for agricultural use, depicts soils ranging from 'prime' to 'not prime'. Is this the same soil map that was used for the 2007? The SEIS should clearly state the source of evidence supporting this claim.
- Transportation. The transportation chapter does not provide any measurable data which might assist a city as it tries to calculate what the transportation impacts from rural development will be under Alternatives 2 or 4. It is not enough to say that Alternative 4 has the "highest potential for impacts". This is a common sense statement but is not supported by evidence and analysis. The cities need better information about how the creation of 12,400 new parcels will directly affect their local infrastructure. In our area, all County roads lead into and through La Center.

Thank you for the opportunity to comment on this iteration of the SEIS and we look forward to a more robust assessment of actual impacts in the next iteration.

Sincerely,


James T. Irish,
Mayor, City of La Center