

Schroader, Kathy



From Dennis Dykes <dnykes@tds.net>
Sent Thursday, September 10, 2015 1:02 PM
To Cnty 2016 Comp Plan
Subject Draft EIS Comments
Attachments GMP 2016 Update Sept 2015 Comments.pdf

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Thank you,
Dennis

September 10, 2015

Subject Comments
 Draft Environmental Impact Statement for the 2016 Comprehensive Growth
 Management Plan Update

To Community Planning
 Comprehensive Plan Comments
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 Vancouver WA 98666
 [Comp plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)

From Dennis R. Dykes, LHG
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Please accept these comments concerning the draft EIS prepared to inform decisions concerning 2016 Comprehensive Growth Management Plan update. I am a landowner living on and managing 65 acres of land designated FR40 although portions of this land have historically been used for agriculture. I have lived here for 25 years. Professionally I am a geologist licensed to practice geology and hydrogeology in Washington. I have also completed a Permaculture Design Certificate course which I am using to develop an integrated agriculture and forestry plan for my land.

I have read through the draft EIS and most of comments submitted through yesterday that are available online at Community Planning. First, I would like to apologize for the comments of my neighbors with the Clark County Citizens United. I found it difficult to find and understand what in their documents were actually comments on the draft EIS. I was here in the early 1990s and understand the emotions that the CCCU expresses and uses to obfuscate rational and legitimate planning. The CCCU did not then and does not now represent the best interests of those that truly want to live in a rural area and community. The clearest indicator of this is the fact that the end result of their efforts would be the suburbanization of rural Clark County.

About the draft EIS

General I found the analysis to be rather vague and generalized. It will be hard based on this level of analysis for the planning commission and council to make informed decisions about the plan. It is simply inappropriate that a "preferred alternative" be crafted from this analysis alone. Of particular interest to me are Alternatives 2 and 4 which will cause the most environmental degradation in the rural areas and reduce most of the economic opportunities currently available. These alternatives include wholesale changes to land use policies which are briefly described, were not developed through a public process, and are incompletely analyzed. A footnote to Table 1-2 states that forest land in the current use program is excluded from the VBLM model. This means that my land, and I would think most land zone for forestry, has been excluded from the analysis. This should be unacceptable to staff and the decision makers.

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The analysis also considers most potential environmental impacts mitigatable but provides no evaluation of the costs either to the landowner or taxpayers. For example under Alt 4 my land could go from one parcel to at least 6, possibly as many as 13. What would the cost of environmentally friendly roads as well the restrictions on how each parcel is used cost me should I subdivide? What would the cost of just going through the subdivision process be? What would the public infrastructure cost associated with all these lots and new houses be? For example, the bridge over the East Fork at La Center will soon reach capacity and a second \$20 million bridge is proposed. What will it cost to upgrade Jenny Creek Road to access this bridge from my property? What will the impact fees be? This is a winding narrow road adjacent to the creek and it will be very expensive to mitigate the environmental impacts of any improvements. I'm sure this scenario is repeated throughout rural Clark County.

Soil The CCCU has raised concerns about the accuracy of the characterization of soil in the draft EIS. As a licensed hydrogeologist I have used the various sources of information about soil identified in the draft EIS and by the CCCU. The GMA has clear definitions of soil characteristics that it is in our interests to protect. These have been used to guide previous planning processes and in previous EISs so I have trouble understanding how the maps presented in the draft EIS could suddenly have significant errors. The CCCU does identify a soil type that is characterized as very good for forestry but is excluded from the maps. I do suggest that staff double check this. Current GIS technology makes this process relatively straight forward although checking the accuracy is always necessary.

The suitability of soil in Clark County for farming and forestry is well established and should not be in question. The decline in agriculture described by the CCCU is related to a lack of leadership and the promotion of incompatible land uses (residential, commercial and industrial) in Clark County. It's an accepted fact that near urban agriculture typically includes higher value crops and benefits from the large nearby markets. Any business will recognize this as a great combination. Agriculture is in transition as the urban population becomes more aware of where their food comes from. We need a land use plan that encourages the kind of people that want to be part of and benefit from this trend, not a plan that promotes residential land uses above all else. Strong and stable zoning is fundamental to a long term business. Would any industry build a facility on land where the zoning could be change to residential? The data cited by the CCCU identifies and describes a problem that the leaders in Clark County need to address to promote this valuable sector of the economy. Forestry would also be served by promotion of local value added industries. The economy of Clark County would benefit more than by simply sending logs to China. It's obvious, as the CCCU acknowledges, that trees grow here.

Water resources This is something I am knowledgeable and passionate about.

Surface Water- I was shocked by the increase since 2007 in 303(d) listings included in Appendix A. The draft EIS glosses over this, barely mentions the additional listings and balances it with the very few delisted. This is not appropriate and needs to be corrected. A casual review of Appendix A shows that more streams have been added to the list or additional parameters add to a listed stream than there are streams with no change. The type of land use in a watershed is the main cause of the degradation of water quality. This analysis suggests that

even Alternative 1 will substantially increase the degradation of surface water in Clark County as occurred between 2007 and 2012. Clark County recently lost a lawsuit that cost taxpayers (not the developers that benefitted financially) well over \$3 million because it chose to avoid managing stormwater as high up in watersheds as possible. With this in the background, rural landowners will be expected to manage stormwater much more in the future. Alternative 1 shows that current requirements are not working even through the development slow down caused by the recession. The draft EIS must include a detailed analysis of this issue and what mitigations will be required and their costs to both the landowners and taxpayers. The over 65,000 acres, nearly a sixth of Clark County, affected by additional parcelization in Alt 4 is a serious potential impact that would be expensive to mitigate.

Groundwater- the draft EIS correctly identifies the availability and quality of ground water as requiring evaluation. Unfortunately the discussions of each are vague and generalized. Detailed analysis and quantification of potential mitigation needs and costs are not provided. It is well known that the yield of wells in the rural areas most affected by Alternatives 2 and 4 is often quite low and inadequate requiring additional costs for development. Subdivisions have been required to install expensive water systems to assure water to all lots. Additionally wells in many areas are contaminated with naturally occurring arsenic, sulfur compounds, manganese and excessive iron as well as nitrates and occasional or recurring bacterial contamination which affect the use of the water. These conditions have led to requirements to prove the availability and quality of the water supply before subdivision or the issuing of building permits putting the government in the position of potentially denying a land use.

The impact of the addition of many thousands of wells must be more thoroughly analyzed. The simple feasibility of the addition of so many wells, the affect of withdrawing that much water on springs, wetlands, streams and ponds as well as the potential risk of widespread aquifer failures should be quantified. These potential problems would be most cost effectively mitigated by rejecting Alts 2 and 4 and continuing Alt 1. Without additional analysis it's impossible to say Alts 2 and 4 would not cause significant problems.

Fish and Wildlife Resources My expertise only peripherally includes these resources. It is clear, however, that these resources are dramatically affected by residential development, agriculture and forestry.

Of these, residential development has the greatest impact. This is because people manicure and maintain a substantial area around their houses and in rural areas have long access roads or driveways. These practices often include the use of pesticides and fertilizers at higher rates than on farms and forests and each house will have a septic system that can also impact water quality. The draft EIS minimizes the impact of parcelization on these resources by saying without documentation that "More common species are likely already accustomed to some level of human disturbance." More detailed analysis is needed: what species, what roles do they play in the ecosystem, what ecosystem functions are lost by exclusion/loss of the other less common species? The conditions created by development affect water flow through the ecosystem, fragment habitat, and create conflicts between people and wildlife. We all have stories about how deer and elk ravage landscaping and if anyone sees a bear or cougar it makes the news.

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These problems often lead to exclusion or elimination of wildlife as well as the more subtle degradation of habitat to the point where wildlife cannot survive or avoid an area. Minimizing the intrusion of residential development is the only effective way to mitigate these impacts.

Agriculture and forestry can continue with practices that can minimize these impacts at little cost. In fact, a healthy diverse ecosystem grows the best trees at the least cost because the system supplies and supports itself. Inputs to agriculture can also be minimized through diversity reducing potential impacts on the ecosystem. These are also the kinds of changes to agriculture that urban residents are looking for in their food supply.

Other Issues The draft EIS addresses a number of other areas of potential impact including land and shoreline use, energy, transportation and public facilities. Each describes the logical increase in impact caused by more parcelization in the rural areas. Arguing that this isn't the case would be nonsense. What the draft EIS lacks is quantification of these impacts and the costs of mitigation both in money and how people use the land.

Conclusion The draft EIS is vague and lacks enough detail for the planning commission, the council and the wider community to make an informed decision about a preferred alternative. If this is as good as an EIS gets then it is clear that the potential impacts of Alternatives 2, 3, and 4 are greater than Alternative 1. The CCCU has attempted to provide additional information to support Alternative 4 but this information includes too many assumptions, rhetoric and extraneous information to overcome the obvious and substantial impacts of this alternative.

Of equally great concern is the fact that Alternatives 2 and 4 require major changes to policies that were developed through public processes. It would be a corruption of the public process to include the elements of Alternatives 2 and 4 that change policy without a public process. The Community Framework Plan (CFP) which is described on page 6-3 (Section 6.1.2) was developed through a community process that included rural residents. It describes a desire and expectation that there will be a clear difference in character between rural and urban Clark County. It set a goal of 10% rural residents and 90% urban residents. The last figures I have seen show this ratio is about 11% to 89%, a bit off the goal. The EIS does not acknowledge the specific goals of the CFP, evaluate their status, nor evaluate the effect of these goals on the environment. These goals were agreed to by the community to allow the rural resource based economy to continue with the least amount of interference from land use conflicts and government as well as to make the provision of public services as cost effective as possible. This is the best way to keep government costs and taxes down.

Respectfully submitted



Dennis Dykes