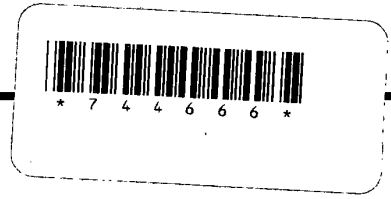


**Schroader, Kathy**



**From:** Orjiako, Oliver  
**Sent:** Tuesday, September 15, 2015 4:38 PM  
**To:** Euler, Gordon; Alvarez, Jose  
**Cc:** Schroader, Kathy  
**Subject:** FW: DSEIS Comments  
**Attachments:** SKM\_C654e15091516320.pdf

Just FYI and for the index of record. Thanks.

Oliver

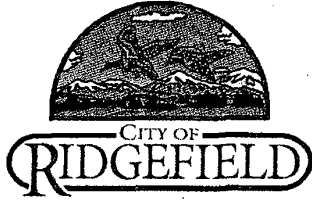
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**From:** Jeff Niten [<mailto:jeff.niten@ci.ridgefield.wa.us>]  
**Sent:** Tuesday, September 15, 2015 4:35 PM  
**To:** Orjiako, Oliver  
**Subject:** DSEIS Comments

Oliver,

Please see the attached for Ridgefield's comments on the DSEIS. I'll bring a hard copy with me to the PC deliberation meeting on the 17<sup>th</sup>. Thank you.

Jeff Niten  
Community Development Director  
City of Ridgefield  
301 N. 3<sup>rd</sup> Ave.  
P.O. Box 608  
Ridgefield, WA 98642  
360-857-5013



*Ronald Onslow, Mayor*  
*Sandra Day, Councilmember*  
*John Main, Councilmember*  
*Donald Stose, Councilmember*  
*David Taylor, Councilmember*  
*Lee Wells, Councilmember*  
*Darren Wertz, Councilmember*

September 15, 2015

Oliver Orjiako  
Clark County Community Planning  
1300 Franklin, 3<sup>rd</sup> Floor  
Vancouver, WA 98666

Dear Mr. Orjiako;

Thank you for the opportunity to provide Ridgefield's comments on the Draft Supplemental Environmental Impact Statement. I appreciate the opportunity to coordinate with Clark County. The City of Ridgefield supports Alternative 3 because it will allow an expansion of our current Urban Growth Boundary to satisfy the residential demand. Alternatives 1, 2 and 4 do not directly help Ridgefield support urban residential demand and, in the case of Alternative 1, has similar impacts according to the DSEIS.

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

- The DSEIS contains an error relating to Ridgefield: The Ridgefield expansion area as part of Alternative 3 was evaluated as a mix of low, medium and mixed use zoning. That zoning mix was not part of the City's request and could skew the analysis of the expansion area.
- The DSEIS does not substantially review the financial cost of each alternative, particularly infrastructure costs. The DSEIS 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 Capital Facilities Plans. The DSEIS acknowledges Alternative 4 will produce more significant costs but provides no insight into what those costs might be. For example, the DSEIS does not discuss in any detail how any jurisdiction might respond to increased local transportation costs relating to the 120,000+ average daily trips 12,401 new homes in the rural area will generate.
- 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 12,401 new homes outside of the UGAs where will that water come from? The SEIS should examine the rural area's capacity for future ground water extraction. Alternatives 2 and 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 12,401 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.
- 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 12,401 new parcels will directly affect their local infrastructure.

Finally, I would like to make it clear that the City of Ridgefield is concerned that the adoption of Alternative 4 would hamper future economic growth opportunities by allowing the division of large parcels immediately outside our corporate boundary. Large employers would be forced to look elsewhere for parcels large enough to accommodate their investment during siting decisions. At a minimum we would request a detailed economic analysis of the impacts to cities resulting from the fragmentation of parcels outside of Urban Growth Areas.

Thank you for the opportunity to comment on the DSEIS. I look forward to working collaboratively with the Board of Councilors and Community Planning during the Comprehensive Growth Management Plan development process.

Sincerely,



Jeff Niten  
Community Development Director  
City of Ridgefield