

**O'Donnell, Mary Beth**

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**From:** Euler, Gordon  
**Sent:** Tuesday, April 07, 2015 5:07 PM  
**To:** O'Donnell, Mary Beth  
**Cc:** Orjiako, Oliver; Cook, Christine  
**Subject:** FW: Clark County Comprehensive Plan update SEPA question



CP16#0625

Mary Beth:

For the index.

Gordy

-----Original Message-----

**From:** ECY RE SEPA HELP [mailto:sepahelp@ECY.WA.GOV]  
**Sent:** Thursday, March 05, 2015 2:29 PM  
**To:** Euler, Gordon; ECY RE SEPA HELP  
**Cc:** Orjiako, Oliver; Cook, Christine  
**Subject:** RE: Clark County Comprehensive Plan update SEPA question

Hi Gordy,

apologize for the delay in my reply, I have been in quite a few meetings the last two days.

Yes, the County can consider as many alternatives that are reasonable per WAC 197-11-440 (5) <http://apps.leg.wa.gov/WAC/default.aspx?cite=197-11-440> for consideration in the SEIS. The county would need to analyze the impacts of all reasonable alternatives considered. It may end up that your supplemental EIS is a rather lengthy document but that is OK. There is no size limit on a SEIS. The EIS and SEIS should function as a combined package to be relied on by those making decisions on the comp plan. So if info in the original EIS is relevant to current decisions, that info should be used and doesn't need to be reproduced in the SEIS.

The SEIS is intended to capture and analyze significant new information and substantial changes to a proposal that was not originally analyzed in the EIS. The fact that you are identifying new geography and changes in the rural areas of the county compared to what was analyzed in the original EIS seem to make this a good example of why a SEIS is appropriate to prepare.

WAC 197-11-405 (4) (a) (b) states that:

- (4) A supplemental EIS (SEIS) shall be prepared as an addition to either a draft or final statement if:
- (a) There are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts; or
  - (b) There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts.

Please let me know if you have any additional questions.

Thanks and have a great day.

Fran Sant  
Department of Ecology  
SEPA Technical Assistance/Rule Coordinator  
360.407.6004

-----Original Message-----

From: Euler, Gordon [mailto:Gordon.Euler@clark.wa.gov]  
Sent: Tuesday, March 03, 2015 4:36 PM  
To: ECY RE SEPA HELP  
Cc: Orjiako, Oliver; Cook, Christine  
Subject: RE: Clark County Comprehensive Plan update SEPA question

Fran:

The comp plan SEPA process continues to unfold here in Clark County.....

I am hearing now that we may have up to four additional alternatives, all dealing with changes in the rural area. Each would create some number of additional lots, and I think one of the alternatives would de-designate a large number of parcels zoned for agriculture and forest. We won't actually know until a Board work session March 11.

So the question is, could we still do a supplemental with up to four additional alternatives? Or are we now headed for a full blown EIS? We've already analyzed three fairly innocuous alternatives to date in a preliminary draft SEIS. Thanks.

Gordy Euler  
Clark County Community Planning

-----Original Message-----

From: Sant, Fran (ECY) [mailto:fsan461@ECY.WA.GOV] On Behalf Of ECY RE SEPA HELP  
Sent: Wednesday, February 25, 2015 3:11 PM  
To: Euler, Gordon  
Subject: RE: Clark County Comprehensive Plan update SEPA question

Hi Gordy,

Thanks for the feedback. As we discussed yesterday I had my Environmental Review Section manager review your questions and my responses before I sent them off to you today.

Thanks- Fran

-----Original Message-----

From: Euler, Gordon [mailto:Gordon.Euler@clark.wa.gov]  
Sent: Wednesday, February 25, 2015 2:47 PM  
To: ECY RE SEPA HELP

**Subject: RE: Clark County Comprehensive Plan update SEPA question**

**Fran:**

**I thank you for this response and the quick turnaround--much appreciated!! I will pass this on to our comp plan team for reactions. I'll certainly be back in touch with any additional questions.**

**Gordy Euler  
Clark County Community Planning**

**-----Original Message-----**

**From: Sant, Fran (ECY) [mailto:fsan461@ECY.WA.GOV] On Behalf Of ECY RE SEPA HELP**

**Sent: Wednesday, February 25, 2015 1:51 PM**

**To: Euler, Gordon**

**Subject: RE: Clark County Comprehensive Plan update SEPA question**

**Hi Gordon,**

**Thanks for the discussion yesterday and your follow-up questions.**

**Please see my responses below:**

**1) If the fourth alternative has the potential for environmental impacts in the rural area, can we still include it as an alternative in an SEIS, along with the other three?**

**Yes, you can include the fourth alternative in the SEIS. That is the purpose of the SEIS, to identify and analyze new information. Perhaps the question here is whether to ask for added scoping comments? Is the 4th alternative in response to comments rec'd during scoping or if is brand new idea different from anything discussed during scoping? If you already did scoping on the other 3 alternatives and this new alternative is completely different, it may make sense to share the 4th alternative with the public. Since you have two more scoping meetings you have an opportunity to do if warranted.**

**2) The fourth alternative is entirely about possible changes in rural areas (new geography). The 2007 EIS did not focus at all on rural areas. In this regard, can it still be considered in an SEIS, or does the new geography of the fourth alternative elevate it to an EIS?**

**Yes, it can be considered an SEIS. The SEIS is intended to capture and analyze significant new information and substantial changes to a proposal that was not originally analyzed in the EIS. The fact that you are identifying new geography and changes in the rural areas of the county compared to what was analyzed in the original EIS seem to make this a good example of why a SEIS is appropriate to prepare.**

**WAC 197-11-405 (4) (a) (b) states that:**

**(4) A supplemental EIS (SEIS) shall be prepared as an addition to either a draft or final statement if:**

**(a) There are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts; or**

**(b) There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts.**

3) In this situation what, practically speaking, is the difference between an SEIS and an EIS? Understandably, if an SEIS will suffice, we do not want to start over with an EIS process. Our biggest problem at this point is one of time.

The difference between an SEIS and EIS is that the SEIS adds new information and analysis to supplement the information in a previously issued EIS. The statutory requirements for preparation are the same as an EIS except that scoping is optional. As per WAC 197-11-620 "The SEIS should not include analysis of actions, alternatives, or impacts that is in the previously prepared EIS"

The EIS and SEIS should function as a combined package to be relied on by those making decisions on the comp plan. So if info in the original EIS is relevant to current decisions, that info should be used and doesn't need to be reproduced in the SEIS.

For more information on the Supplementing an EIS please see Chapter 3.6 in the SEPA handbook:  
<http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbch03.html#3.6>

Please let me know if you have any follow-up questions.

Thanks and have a great day.

Fran Sant  
Department of Ecology  
SEPA Technical Assistance/Rule Coordinator  
360.407.6004

-----Original Message-----

From: Euler, Gordon [mailto:Gordon.Euler@clark.wa.gov]  
Sent: Tuesday, February 24, 2015 2:41 PM  
To: ECY RE SEPA HELP  
Cc: Orjiako, Oliver; Cook, Christine  
Subject: Clark County Comprehensive Plan update SEPA question  
Importance: High

Hello:

Thanks for chatting with me earlier this afternoon.

Clark County is in the process of updating its comprehensive plan, with a June 30, 2016 deadline. The Board adopted a population and jobs target for the 20-year planning horizon (2015-2035). Subsequently, it was determined that there is enough developable land inside current urban growth areas (UGAs) to accommodate population and jobs. This is due to the fact that Clark County added huge amounts of land to UGAs in 2007 (the last comp plan update). As such, we made the decision to re-adopt the 2007 comp plan EIS and prepare an supplemental EIS outlining a few things we are doing in this update (notices were published in July 2014). We had scoping meetings (even though not required) last August and settled on three alternatives for the SEIS. We had two additional open houses on the alternatives in October. Work on the SEIS commenced in October. On January 21, 2015 the Board asked that work on the SEIS be stopped while a fourth alternative was developed.

We plan to have two open houses and a Board hearing on the alternative. The question is how to proceed, given the fourth alternative. Here are some questions/concerns:

- 1) If the fourth alternative has the potential for environmental impacts in the rural area, can we still include it as an alternative in an SEIS, along with the other three?
- 2) The fourth alternative is entirely about possible changes in rural areas (new geography). The 2007 EIS did not focus at all on rural areas. In this regard, can it still be considered in an SEIS, or does the new geography of the fourth alternative elevate it to an EIS?
- 3) In this situation what, practically speaking, is the difference between an SEIS and an EIS? Understandably, if an SEIS will suffice, we do not want to start over with an EIS process. Our biggest problem at this point is one of time.

So, we are looking for guidance on how to proceed. Please let me know if I can provide further details. Thank you!

Gordy Euler  
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