

cc'd= Ariako
Schroeder

9-10-15

Clark County Board of Councilors,
P O Box 5000
Vancouver, Washington 98666

DSEIS - More Work is Needed

September 10, 2015
For the Public Record

Dear Councilors,

Alternative 4 is the best choice of the alternatives offered in the DSEIS, but more work needs to be done. Authors of the Draft SEIS didn't go far enough in their analysis. Nor did they adequately portray 13 equal goals in 36 70A 020 of the GMA, particularly, protection of private property rights. Environmental impacts are biased and skewed against Alternative 4. GMA Comprehensive Land Use Planning, is to plan for housing, economic vitality and infrastructure, to accommodate growth for 20 years, not plan for no growth or prevent growth. A status quo plan is not realistic and a community will quickly fall behind in meeting GMA goals. According to CTED, this county grew by 15,000 people from 2013 to 2014, but is only planning for 6,431 now. That's less than half annual growth and is not acceptable.

Michael Williams, Southwest Region Planning Manager, Washington State Department of Transportation, Vancouver office, states, "WSDOT's vision is to provide a sustainable and integrated multimodal transportation system." One assumes the major improvements to State Highway 502 was to meet that goal, for expected growth of 20 years and beyond. Clark County will likely continue the statistical trend of 15,000 new people annually and the state needs to plan for realistic growth. Alternative 4 does not drive increased population, as growth happened between 2013 and 2014 with status quo. Transportation has also been frozen with zoning, and the state is falling behind. Alt 4, will simply recognize existing parcels in rural and resource areas. Transportation impacts from these lots already happened and have no effect on increased future impacts. As always, new parcels will pay for new impacts via policy and taxes.

Dividing potential Alt 4 lots by 20 years, equals only 620 parcels a year. With steep slopes and critical areas removed, the number would be much smaller. Alt 1 equals 354 and Alt 2 equals 411 parcels a year. Alternative 4 calls the land what it is, using predominant parcel size in an area. Alt 1 and 2 don't. It's good sense for the county to be realistic in evaluations. Some lots will be created, but environmental impacts are minimal as county code has protections for future environmental impacts. The Draft SEIS does not give analysis in this regard. The DSEIS simply makes statements, backed by limited scientific data. More work is needed in the draft to demonstrate true environmental impacts of all of the alternatives.

Soil Limitations to Septic Systems map Figure 2-3, says most the county is very limited to septic sewer systems, and yet agriculture and forest maps show most the county as prime or good soils. Septic systems need well drained soils, as do agriculture and forests. If soil is not conducive to septic systems, it is not conducive to resource land. The DSEIS does not demonstrate this. The Lagler Dairy Farm is being proposed for commercial and industrial development. Engineers say it is ideal for the proposed use, because the soil is excellent for percolation of septic sewer systems and storm water run off. Quantified prime and good soil is critical in the GMA. The 1980 Comprehensive Plan recognized this, but it's missing in the 2015-16 DSEIS. The county would do well to review other EIS documents to understand the necessity of getting it right. There is still much work to be done. Alternative 4 is a good start.

Sincerely,

Carol Levanen, Ex Secretary
Clark County Citizens United, Inc
P O Box 2188, Battle Ground, Washington



018352