

Summary of DEIS Comments - ALPHABETICAL by Commentor

| Commentor: | Summary of Comment: | Response |
|---------------------------------|--|---|
| Addis, Kevin | Concern for environmental impact and request for survey information from impacted residents and infrastructure revenue funding information. | <p>1.) The GIMA requires that the county plan for the projected number of people expected to be living in Clark County in 20 years. The county is working through a planning process to try to determine the best way to manage this growth.</p> <p>2.) Information is included in both the DEIS and FEIS on the potential impacts to habitat and scenic values and a host of other things of environmental importance. A buffer along the Washougal River could certainly be included.</p> <p>3.) We are not sure what survey information you are referring to. With regard to costs and revenues, a capital facilities plan will be prepared before the comprehensive plan is adopted showing costs for new facilities for growth and the projected revenues to pay for them.</p> |
| Agar, Peter & Tamara | Opposition to Alternatives #2 & #3 for Battle Ground region. | Comments noted. |
| Agenda: BOCC Hearing 09/20/2006 | Agenda for BOCC Hearing to solicit agency comments on DEIS. | Hearing Agenda - no comments required. |
| Alm, Don & Jennie | Opposition to Alternative 3, specifically west end of Salmon Creek, with concern for septic systems and storm runoff. Request to be excluded from proposed UGB. | This is a Site Specific Request to be excluded from the UGB. Noted for record; no response required. |
| Bergeron, Wayne | Opposition to being included in the Battle Ground UGB. 274419-000, 274588-000, 274571-000, 195275-000, 195287-000 & 195252-000. | This is a Site Specific Request to be excluded from the UGB. Noted for record; no response required. |
| Bodell, Polly | Request to expand UGB to include V-1 area with R1-20 to 1 acre large-lot zoning and supporting commentary. Request to identify UR-10 designation and where it will be applied. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Bottemiller, Steve & Carol | Approval of Alternative #3, Vancouver NW. | Comments noted. |
| Bourquin, Phil | 1) Camas Residential Development, 2) Prime industrial lands, 3) City of Camas proposed rebalanced map, with attached data and maps. | Comments noted. |
| Brown, Arthur | Need to finish this process, it makes sense for this area to be developed. Parcel # 117020-000. | Comments noted. |

Commentor: Summary of Comment:**Response**

| | | |
|---------------------------|--|--|
| Brown, Milton O. | Request to include 89 acres into Vancouver UGB. Parcels # 183079-000.0, 183081-000.0, 183086-000.0, 183090-000.0, 183080-000.0, 183082-000.0, 183087-000.0, 183091-000.0, 183061-000.0, 183088-000.0, 183083-000.0, 183084-000.0, 183089-000.0 & 183085-000.0. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Brown, Milton O. | Request to include 110 Acres in Vancouver UGB. Parcels # 213065, 213068, 213072, 213070, 213074, 213080, 213066, 213069, 213076, 213079, 213067, 213071, 213073, 213075, 213077, 213082, 213078, & 213081. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Buck, Joe & Teri Lyn | Opposition to Alternatives #2 & #3 for Battle Ground region. | Comments noted. |
| Calnan, John and Anita | Opposition to inclusion into the boundary. Comment that area is major staging and wintering ground for migratory fowl. Land use zoning changes would result in loss of uses and they do not want that to happen. 209720-000 | This is a Site Specific Request to be excluded from the UGB. Noted for record; no response required. |
| Camas, City of | 1) Camas residential development, 2) Prime industrial lands, 3) City of Camas proposed rebalanced map, plus attached spreadsheets. | Comments noted. |
| Carman, Lynn | 1) Lack hazards (super fund sites, all EPA sites & Camp Bonneville), 2) poor planning to provide concurrency services, 3) sprawl. | Comments noted. |
| Christensen, Paul | Request to include 171727-000, 172341-000, 171727-000, 171704-000, 172557-000, 172553-000, 172559-000, 173178-000, 172557-000, 173213-000, 173212-000, 173193-000, & 173158-000 into Camas' UGB. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Cisney, Merle E. | Request to include their 30 acres north of Lacamas Lake in the Camas UGA. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Cisney, Robert & Debra | Requesting inclusion of their 10 acres north of Lacamas Lake in the Camas UGA. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Clark County News Release | "County extends comment period on growth planning". Deadline for public comment on DEIS extended to October 2. | News Release Record - no comments required. |
| Clark, Arlen | Comment regarding coyotes not being mentioned in DEIS. | 1.) Coyotes are not a species on either the federal or state endangered/threatened species lists. |

Commentor: Summary of Comment:**Response**

| | | |
|--------------------------|--|--|
| Close III, Daniel V. | Opposition to Alternatives #2 & #3 for Battle Ground region. | Comments noted. |
| Cobb, Roland & Connie | Request to be excluded, or if must be included, to limit lot size to 1 acre or larger. Parcel #19880-005. | This is a Site Specific Request to be excluded from the UGB. Noted for record; no response required. |
| Connelly, Eric | Comments/concerns re: infrastructure deficiencies and capital facilities deficiencies. | Comments noted. |
| Connelly, Eric | Concerns on Infrastructure deficiencies, Financial/traffic. "Citizens will suffer too much, decline of livability will be too great, and impact on our natural resources will be too great to proceed at this time." | Comments noted. |
| Coop, John | Request to include his property in UGA and change zoning under Alternative 3 from R-10 to Commercial Light Industrial. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Coop, John | *COPY-DUPLICATE* Support for Alternative #3 as it pertains to parcels #179152-000 and 179191-000. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Crawford, Tom & Marianne | Opposition to Green Mountain and Northshore Land regions of Lacamas Lake being "swallowed up by large developers for the use of businesses and homes". | Comments noted. |

Commentor:**Summary of Comment:****Response**

| | | |
|---------------------|---|--|
| Creager, Kurt | Comments that DEIS does not address the demand for affordable housing, particularly extremely and very low-income residents. | 1.) Housing affordability is discussed beginning on page 153 of the DEIS, although no projections of affordability over the 20-year planning period were done. Table 49 shows the number of county households that can afford rents within specific ranges, and compares the ranges to the HUD fair market rent, which is higher than what over 20,000 existing households can afford. SEPA does not require an EIS for a GMA document to quantify the impacts of future growth on affordability. The RCW citation refers to the adequacy of comprehensive plan elements under the GMA, and does not refer to the adequacy of housing analysis in a DEIS. The FEIS can address how the County and its cities comply with state and federal regulations pertaining to allowing for government-assisted housing, manufactured housing, group homes and foster care facilities. |
| Creager, Kurt | *COPY-DUPLICATE* Comments that DEIS does not address the demand for affordable housing, particularly extremely and very low-income residents. | 2.) It is true that policies for affordable do not guarantee availability of affordable housing. The demand for affordable housing may need to be met through additional county and city policies and incentives. This can be reflected in the "additional mitigation" section of the land use section of the FEIS. |
| Currier, Dave | Addition to previous comment with reference to page #'s in the DEIS. | 3.) Alternative 2 or a modification of this alternative that has become the Preferred Alternative would allow a large amount of single-family development to occur outside of Vancouver and is unlikely to improve the availability of affordable housing. The DEIS reflects current county policy to address affordability of housing through policies and implementing regulations. This discussion can be expanded in the FEIS. |
| Currier, Dave | *COPY-DUPLICATE* Concerns & objections to changes in growth boundaries, specifically on south side of NE 28th Street. | Comments noted. |
| Currier, Dave | Concerns & objections to changes in growth boundaries, specifically on south side of NE 28th Street. | Comments noted. |
| Currier, Dave & Kay | More density = lower values over time. We prefer urban reserve. Think before you leap! | Comments noted. |
| Curry, Barbara | Opposed to continued spending of taxpayers' money on the Growth Management Project and does not want to be included in UGB. | Comments noted. |
| Davis, L. | Thanks for offering this information. | Comments noted. |

| Commentor: | Summary of Comment: | Response |
|--------------------------------------|--|--|
| Dennis, Paul; Mayor | Comments specific to density and housing mix goals. | Comments noted. |
| Dennis, Paul; Mayor | Comments re: new road plans and intent to preserve Ledbetter Mansion. | Comments noted. |
| DeTemple, Charles & Frank | Request that their property be excluded from the newly proposed Camas Urban Growth Area. | This is a Site Specific Request to be excluded from the UGB. Noted for record; no response required. |
| Douglass, Steve | Marc Boldt should recuse himself from voting on issues that will benefit his brother. | Comments noted. |
| Douglass, Steve | Will Boldt Dairy be treated the same as other property? Infrastructure concerns for construction and funding. Concern that there is little talk of creation of new jobs. | Comments noted. |
| Doutrich, Dawn & Steigelman, Michael | Support of Alternative #1 (no change) with 6 suggestions/comments provided. | Comments noted. |
| Dowd, Charles & Vicki | Request to be included in Camas UGB. Parcel 175266 and 175270. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |

Commentor: Summary of Comment:

Durgan, Robert T. DEIS Comments and Critical Lands Report

Response

- 1.) Your comments are noted. The DEIS is based on the direction of the Board which is to accommodate a higher growth number.
- 2.) The key development assumptions used to develop the alternatives were chosen by the Board through a public process. All the assumptions (e.g., infrastructure factor, growth rate, development on critical lands, employment and housing densities) reflect policy decisions by the Board.
- 3.) The Board provided direction for the development of the alternatives to include a variety of densities (e.g., employment densities, tired density for each of the cities). See the Clark County Buildable Lands Report (August 2002) per the requirements of RCW 36.70A.215 which was based on actual development.
- 4.) Overrides that were not documented have been excluded from this analysis. As noted in Table 60, page 188 the actual job densities achieved from 1995 to 2000 exceeded the 9 and 20 jobs per acre target, so the Board's job density assumption is not unreasonable. The public sector job estimate is based on Washington State Employment Security Department. data on public sector job growth as a percentage of total covered employment. Public sector jobs are likely to be located on existing exempt lands as well as non-exempt lands such as new school sites not currently owned by a school district.
- 5.) See response #2.
- 6.) Your comments are noted.
- 7.) Table 87 expresses Alternative 1 as the full buildout of the existing Urban Growth Area in terms of existing dwelling units and acres. Alternative 2 contains the proposed Urban Growth Areas.
- 8.) The capital facilities plan data in the DEIS for the Evergreen School District (pages 230 and 232) says that under Alternative 1 the District would need to construct six elementary schools, one middle school and one high school, for a total of eight new schools in addition to those that are planned in the next six years. Under Alternative 2, the District would need to construct seven elementary schools, one middle school and one high school, for a total of nine new schools in addition to those that are planned in the next six years. There also would be approximately 1,300 students attending classes in portables, a slight increase in the number of unhouseed students projected under Alternative 1. Under Alternative 3, the District would need to construct seven elementary schools, one middle school and one high school, for a total of nine new schools - the same number projected under Alternative 2. There would be approximately 73 additional students attending classes in portables under Alternative 3 in comparison to Alternative 2. The District needs to construct one additional elementary school to accommodate projected growth under Alternatives 2 and 3 because the county estimated that there would be approximately 716 additional single family homes built in that portion of the Vancouver Urban Growth Area that is in the Evergreen School District under Alternatives 2 and 3 (fewer housing units are forecast under Alternative 1). The District's anticipated increase in student enrollment is a result of the additional housing, with the biggest increase projected at the elementary school level. Similarly, the slight increase in the number of students that would be attending classes in portables under Alternative 3 is a result of the estimated 112 additional housing units in the Camas Urban Growth Area (sub area 1)

Commentor:**Summary of Comment:****Response**

that is in the Evergreen School District.

9.) The discussion of policy issues on page 213 was not intended to be a comparative cost benefit analysis of the various transportation investment options. Reference is made to transportation planning projects currently underway to address some of the major issues related to cross river and transit capacity. The purpose of the DEIS is to evaluate growth alternatives, not to prioritize regional transportation investments on interstate corridors. Estimates of future transportation funding from the state are very conservative. Projections based on past history are problematic now that the legislature has assumed a greater role in determining where funding is allocated. We agree that the Board is likely to increase impact fees to generate much of the revenue shortfall; however they have not yet taken that action. The impact fee estimates in the revenue model are based on current TIF rates and the growth in daily trips projected for the plan horizon year.

10.) Your comment is noted.

11.) Jerry Olson expresses two concerns about the Vacant Buildable Lands Model (VBLM) yield calculations:

1., He states that according to the model a large number of people that will be living on environmentally constrained land.

2., He questions whether the Infrastructure deduction used for Residential land includes enough land for schools and parks.

With regard to the first concern, for the 1994 and 2004 Comprehensive plan process it was assumed that parcels with more than 50% environmental constraints would not develop. During the data driven assumptions analysis it was determined there were flaws in the environmental constraints analysis. There were many examples of these lands developing during the past ten years. For the current process the environmental constraints methodology was changed so that environmentally constrained lands were treated as aggregate area independent of the parcel configuration. The new methodology provided a much better method of evaluating the rate of development during the past 10 years. It was determined that vacant and underutilized land with environmental constraints converts to other classifications at half the rate of non constrained land. The BOCC agreed that 50% of the constrained lands would be converted to other classifications during the course of the comprehensive plan.

Mr. Olson's assumption that lower job and population densities will occur on constrained lands vs. non - constrained lands is probably true. The density of housing units and jobs per acre has not been reviewed with respect to constrained vs. non-constrained lands.

During the VBLM analysis it was determined that constrained lands have higher percentage of infrastructure than do non-constrained lands. This is because the constrained lands are converted preferentially to parks and open space. This supports Mr. Olson's assumption. The analysis also showed that using different infrastructure deductions for constrained vs. non-constrained had a minimal effect on the final yield.

Mr. Olson's report uses an aggregate housing units and jobs densities numbers. Housing units and jobs densities vary depending on comprehensive plan

Commentor: Summary of Comment:**Response**

designation. To fully evaluate Mr. Olson's assumption it would be necessary to take a much closer look at what housing and employment densities were achieved on constrained and non-constrained lands during the past 10 years. These numbers could then be used to adjust the density forecasts for the current comprehensive plan. Since housing and employment density was not considered a data driven assumption this has not been fully evaluated for this comprehensive planning process. With regard to the second concern, the infrastructure deductions are data driven assumptions based on the development trends that have occurred during the past ten years. Mr. Olson's analysis suggests that all of the parks and school lands required for the expected growth during the life of the comprehensive plan will be converted from vacant and underutilized residential land. During the past 10 years this has not been the case. New school property has been acquired outside the existing UGB. Parks lands have been created primarily from industrial, commercial, and residential constrained land. Park lands have also been acquired outside the UGB. The VBLM analysis has not compared how much park land was purchased during the study period against how much park land was needed to meet planning goals. Recent efforts by the Battle Ground School District to site a new elementary school highlight the challenge facing schools trying to purchase residential vacant land.

| | | |
|---------------------|---|--|
| Erickson, Mark | I would like to be included in the new zoning designation (higher density) when the plan is adopted. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Esser, Kevin | I need someone to explain to me why the top of Green Mountain is designated as "employment/business". Clearly not suited for this. Please give me a call at 360-834-7007 night, 503-745-8307 day. | Comments noted. |
| Forbes, Ed & Carole | Request for Alternative #3 to include a 7 acre parcel at corner of 50th Ave & 179th Street, Parcel # 193327-000. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Forbes, Edward | In favor of Alternative #3. | Comments noted. |
| Francis, Bob | The only alternative to accommodate growth is to allow building in areas outside of the present boundaries of the urban area. | Comments noted. |
| French, Angela | Request to be included in the UGB and to let Washougal grow. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |

Commentor: Summary of Comment:**Response**

| | | |
|-------------------------|---|--|
| Friends of Clark County | 68-page commentary. | 1.) The estimates for transportation costs do not include local and neighborhood street improvements, because these roads are built by developers as a condition of development approval. The second comment regarding transportation infrastructure does not relate to the DEIS, but to the development approval process. Staff is aware that many road segments have not yet been built to the design standards of the functional classification adopted in the Arterial Atlas. The concurrency and traffic safety analysis required prior to development approval should be adequate to address the stated concern. 2.) The purpose of the DEIS is to disclose information about environmental impacts. 3.) Your comments are noted. The DEIS is based on the direction of the Board which is to accommodate a higher growth number. Any change in policy of how the county grows in the future is at the discretion of the Board. 4.) The observed job densities for new construction between 1995 and 2000 were 9.9 jobs per gross acre for industrial uses and 22 jobs per gross acre for commercial uses. These actual densities are comparable to the 9 and 20 jobs per net acre assumed in the DEIS per Board direction. 5.) See response #3. The FEIS and other related documents such as capital facilities plans will address how to pay for anticipated growth. |
| Garrett, Timothy | Please adopt #1 Alternative. Remember we have already 4000 homes on the market with no one purchasing them. | Comments noted. |
| George, Dan | SSR to include 196185-000 Collier, 196185-005 George, 196197-010 & 196185-010 Hart, 196186-000 Nelson, 196242-000 Poage in V4 South of Salmon Creek. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Germann, Larry | Request to include 153962-000 & 154009-000 located at 16209 NE 99th St, in UGB. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Gervais, Alan | 30-day comment period is insufficient. | Comments noted. |
| Gillaspie, David | Need to notify homeowners by mail on proposals. Not everyone takes the local newspaper. | Comments noted. |
| Gilroy, David | Concern for habitat and environment with references to EIS Scoping Comments index. | Comments noted. |
| Gruher, Jim & Monica | *COPY-DUPLICATE* 1) Traffic, 2) Utilities, 3) Not orderly, 4) Decrease in quality of life. (This is a duplicate copy of letter sent also to Commissioner's office.) | Comments noted. |
| Gruher, Jim & Monica | 1) Traffic, 2) Utilities, 3) Not orderly, 4) Decrease in quality of life. | Comments noted. |

| Commentor: | Summary of Comment: | Response |
|-------------------|---|--|
| Haberstzer, Donna | Requesting inclusion of parcel # 154-006-000 owned by Roth Investments, LLC, into the UGB. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Haddon, Lance | 30-day comment period insufficient. | Comments noted. |
| Hammack, Duncan | Request to rezone 257370-000 @ 701 NW 379th Street, La Center WA from FR-40 to RA density, and that the current mining overlay be lifted. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Hardy, Dave | Opposition to expansion into the Fern Prairie area in Camas. | Comments noted. |

Commentor:

Hayes, Jennifer

Summary of Comment:

Alt #1 does not adequately evaluate the potential for accommodating new population within existing UGA boundaries using Low Impact Development and open space corridor planning.

Response

- 1.) The comments about the potential of LID and open space corridor planning to mitigate the impacts of development are well taken. Low Impact Development (LID) is an approach to stormwater management that mimics nature's processes through small, cost-effective landscape features located at the lot level instead of conveying and managing / treating stormwater in large, costly end-of-pipe facilities located at the bottom of drainage areas. Almost all components of the urban environment have the potential to serve features of LID, not only open space, but also rooftops, streetscapes, parking lots, sidewalks, and medians. LID is a versatile approach that can be applied equally well to new development, urban retrofits, and redevelopment / revitalization projects. Consequently, implementation of LID means higher-density development can have fewer net impacts from stormwater runoff than either non-LID higher-density or single-family development. Green infrastructure strategies can also be part of LID, providing a way to achieve desired densities while limiting the use of land and maintaining critical ecosystem services. Adopting green infrastructure practices into land use and site planning can result in keeping habitat protections or stormwater management as part of other recreational or scenic amenities of a site. As a system, green infrastructure is an integrated network of streets, forests, greenways, and bikeways that are designed to enhance their ecological function. An example of green infrastructure would be street trees which evaporate stormwater, absorb pollutants, and provide cover for pedestrians. Another site strategy for high-density development is combining open space requirements with a vegetated infiltration basin for stormwater flow control and volume reduction. The FEIS section on impacts and mitigation from high density development will be expanded to reflect this.
- 2.) If the No Action Alternative were adopted unchanged as the Preferred Alternative, analysis shows there would be insufficient land under the existing zoning designations to accommodate projected residential growth. That alternative alone would not meet the requirements of the GMA. Upzoning within the existing UGAs is an option for keeping the existing UGAs and also accommodating future growth. The BOCC decided to draft the No Action Alternative with the assumption that some upzoning would be required, but no specifics as to how or where that would be done were included. The BOCC assumed that further analysis of upzoning options could occur in the development of a Preferred Alternative and be analyzed in the FEIS. However, the Preferred Alternative includes an expansion of the UGAs and no changes to existing zoning are proposed under the Preferred Alternative. Pressure for development on rural areas could be offset by increased development options from upzoning in the urban areas; however, without specifics of upzoning implemented as part of Alternative 1, the potential for development pressure on rural areas should be disclosed, particularly if the market demand for single-family detached housing exceeds supply in urban areas because of conversion of low-density residential zones to multi-family zones.
- 3.) Paragraphs 2-4 on page 20 discuss upzoning as part of Alternative 1. Additional information will be added to the revised DEIS.
- 4.) The areas mentioned as lacking open space corridors (Vancouver, Camas and Washougal) already lack open space corridors. One of the Board's principles and

Commentator: Summary of Comment:

Response

values is to maintain open space that already exists, particularly between Ridgefield and La Center.
5.) When land is annexed into a city, that city's regulations apply. All Clark County cities have critical areas ordinances that are assumed to be GMA-compliant.
6.) Support for use of transfer of development rights, open space corridor planning, cluster development and other innovative strategies for reducing impacts from growth are noted.

Hayes, Molly

1) Information of potential changes/proposals need to be made, not just in paper, by mail, also for meetings!
2) #3 plan appears to have more open/green space which we must keep/have/protect.

Comments noted.

Henry, Lisa Nichols

Comments regarding Battle Ground school districts problems and quality of life near St. Johns Road, comments on lack of zoning protections for property values.

Comments noted.

Hobson, Hali; Realtor

Request to have properties included in UGB/Camas annexation with attached signatures from residents.

This is a Site Specific Request to be included in the UGB. Noted for record; no response required.

Hogan, Pat

Take Carty Lake area out of Ridgefield boundary!

This is a Site Specific Request to be excluded from the UGB. Noted for record; no response required.

Holtmann, John J.

Support for Alternative #3 and commentary that there appears to be an overall shortage of good light and heavy industrial land within Clark County's UGB.

Comments noted.

Commentor:

Horenstein, Stephen &
Howsley, James

Summary of Comment:

- 1) Population projection, 2) Transportation, 3) VBLM,
- 4) Legal adequacy under SEPA, 5) Additional Mitigation, plus 5 more specific comments.

Response

- 1.) Your comments are noted. The DEIS is based on the direction of the Board which is to accommodate a higher growth number. Any change in policy of how the county grows in the future is at the discretion of the Board.
- 2.) Estimates of future transportation funding from the state are very conservative. Projections based on past history are problematic now that the legislature has assumed a greater role in determining where funding is allocated. We agree that the Board is likely to increase impact fees to generate much of the revenue shortfall; however they have not yet taken that action. The impact fee estimates in the revenue model are based on current TIF rates and the growth in daily trips projected for the plan horizon year. More discussion of the potential for additional state and TIF revenue will be included in the final document.
- 3.) At the time of preparing the DEIS, the county relied on the most current data and on policy directions from the Board which included the base year of 2004. Information on plated lots or pending subdivisions are outside the scope of the DEIS.
- 4.) The nature of Alternative 3 as the geographic flexibility alternative made it impossible to adequately compare it to Alternative 2. It was decided that the best course of action was to discuss each Alternative 3 subarea individually so that an assessment could be made if the Board chooses to include any of them along with Alternative 2 lands in the preferred alternative.
- 5.) The reviewer is correct in that it is assumed that develop regulations are in place that will adequately protect, for example, critical areas. The information on mitigation is presented precisely for this reason--to let readers know that there are policies, programs and regulations in place to mitigate the expected impacts of growth.
- 6.) Your comment on Camas' growth and required upzoning to accommodate future population is noted. Data from 2004 to 2006 were not provided for all jurisdictions by way of comparison.
- 7.) The county has engaged a consultant to prepare an analysis of designated agricultural land proposed for inclusion in Alternatives 2 and 3. The Board will consider that report and any subsequent information to make findings on whether those specific properties should be included or excluded from urban growth boundaries. These comments, however, are not adequate to conclude that AG-20 lands should be included or excluded from urban growth boundary expansions.
- 8.) This information will be added to the revised DEIS.
- 9.) This information will be added to the revised DEIS.
- 10.) La Center junction is not characterized by urban development by any stretch. It makes sense for La Center to have the connection to I-5. Provision of true urban services, such as water and sewer, however, is a whole different issue, and these are presently a long way from the junction.

Howsley, James

Inclusion of parcels 177904-000, 177884-000, 177885-000, 177891-000, 175259-0000, 175258-000, 175727-000, 175726-000, 175772-000, 175733-000, 1755724-0-00, 175747-000, 175752-000, 175713-000, 175717-000, 175717-000,& 175712-000 in Camas' UGB. (Lacamas North Shore properties).

This is a Site Specific Request to be included in the UGB. Noted for record; no response required.

Commentator: Summary of Comment:**Response**

| | | |
|----------------|--|--|
| Howsley, James | Request to include 214427-000 known as "Mt. View Dairy", currently zoned AG and owned by William Rohrer. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Howsley, James | Request to include 181466-000, 181548-000, 181580-000 known as "Zilke Property", currently zoned AG PF UR owned by Wilfred & H. Marjorie Zilke; and 181581-000 known as "Milbrandt parcel", currently zoned UR owned by Birchwood Farms LLC. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Howsley, James | Request to include 216450-000, 216452-000, 216477-000 & 216690-000 known as "Kennedy Property", currently zoned R-10 PF AG and owned by William Kennedy. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Hukia, James | 30-day comment period is insufficient. | Comments noted. |

Commentor:

Irish, Jim; Mayor

Summary of Comment:

66 specific line-item comments to DEIS.

Response

- 1-5.) See responses #1-5 for DEIS 82, also a letter from the City of La Center.
- 6.) Alternative 3 contains 19 subareas that could be used to add land to Alternative 2. It would be more correct to say that Alternative 3 is not a stand-alone alternative, because adding the 19 subareas to Alternative 2 would result in a much larger than needed expansion area to accommodate 20 years of projected growth. The ability to serve Alternative 3 subareas is discussed in the Public Facilities and Utilities section of the DEIS.
- 7.) The purpose of providing information on mitigation is to let readers know that there are policies and regulations in place to address most if not all impacts from development.
- 8.) If L2 goes to urban reserve, then the traffic impact would certainly be less than stated. L2 as analyzed in the DEIS included both single family and multi-family residential in the area of 11th Avenue and NW Spencer Rd.
- 9.) This information will be added to the revised DEIS.
- 10.) This information will be added to the revised DEIS.
- 11.) See response #1, DEIS 82.
- 12.) The rest of the principle/value includes 'that can be serviced effectively'. La Center has acknowledged its desire to, but the difficulties of, serving the junction.
- 13.) The total acreage for the new La Center UGA in Alternative 2 in the DEIS is 1,213 acres. Where calculations of land area were based on overlays, the acreage can be slightly higher, either due to rounding or minor errors in mapping. This shows up in Table 26, Critical Aquifer Recharge Areas, as 1,218 acres because the mapping layer includes surface waters. The actual land area added in the UGA is correct to the best of the County's calculation, at 1,213 acres. The authors could not find a reference to 1,220 acres in the DEIS.
- 14.) Figure 4 is correct based on the information that was presented and analyzed in the DEIS.
- 15.) One of the Board's principles and values was to try to identify areas in the county that should not be made urban because of their environmental value(s) or the presence of severe environmental constraints.
- 16.) Critical areas are removed from the buildable inventory but it is not always possible to state with certainty that there won't be some impact to all gross acres. The purpose of providing the information on development regulations and mitigation is to let readers know that there are policies and regulations in place to address most if not all impacts from development.
- 17.) This information will be added to the revised DEIS.
- 18.) As originally proposed, L2 contained multi-family residential.
- 19.) This information will be added to the revised DEIS.
- 20.) This information will be added to the revised DEIS.
- 21.) This information will be added to the revised DEIS.
- 22.) The mitigation section is included to state that soils with severe limitations can still be built developed.
- 23.) The error in the characterization of the zones in the DEIS has been corrected.
- 24.) The stream miles as shown in Table 17 are correct based on data provided by County GIS.

Commentor:**Summary of Comment:****Response**

- 25.) The data in Table 20 were generated by county GIS staff based on what is actually observed in land developments.
- 26.) The DEIS has been revised to reflect lower impacts from Parks/Open Space zoning.
- 27.) To the extent that Parks/Open Space zoning will preserve land from development, the addition of L1 and L2 subareas would not the same potential for adverse impacts as under other urban zones. However, as long as the subareas are within the UGA, they are potentially subject to requests for rezones, whereas they would have greater protection against conversion outside the UGA. Unless there are deed restrictions or special overlays targeted to protecting those areas, the claim that floodways and floodplains will have enhanced protections by adding the subareas to the UGA rather than leaving them outside the UGA is not accurate.
- 28.) The data in Table 24 were generated by county GIS staff based on what is actually observed in land developments.
- 29.) There are no impacts to McCormick Creek by the Alternative 3 subareas. The data for Allen Creek is correct in Table 24.
- 30.) This information will be added to the revised DEIS.
- 31.) Your comments are noted. The revised DEIS and FEIS reflect the observation that Parks/Open Space zoning will have less impact on priority habitat than is indicated by the Table 33. Alternative 2 does not add any Parks/Open Space zones to the UGA, so the reference to Table 32 does not apply.
- 32.) Your comment is noted. This will be reflected in the FEIS.
- 33.) As originally proposed, L2 contained multi-family residential.
- 34.) The data is correct for the land uses presented in the DEIS for L1.
- 35.) Under section "f" on page 187, a sentence noting La Center's lack of industrial land has been added.
- 36-37.) According to Clark County GIS, Alternative 2 would add 507 acres of employment land, and Alternative 3 would add 325 acres of industrial land (no distinction of light industrial).
- 38.) This information will be added to the revised DEIS.
- 39.) This information will be added to the revised DEIS.
- 40.) This information will be added to the revised DEIS.
- 41.) This information will be added to the revised DEIS.

Commentor: Summary of Comment:**Response**

| | | |
|---------------------------|---|--|
| Irish, Jim; Mayor | Comments re: L1 and L2 subareas. | The comments from the city were in favor of Alternative 3, with a couple of exceptions. The city commented on the characterization of how well the alternatives met the Board's principles and values. The characterizations were made from a county-wide perspective, not from a La Center perspective. |
| | | 1.) As proposed in the DEIS, the characterization of L1 and L2 is correct. La Center's revised proposal submitted as a comment on the DEIS would show that this principle/value was met. |
| | | 2.) As proposed in the DEIS, neither L1 nor L2 contained any commercial land. Alternative 2 does include commercial land on the east side of I-5 along La Center Road. |
| | | 3.) Again, Alternative 2 meets this principle/value, but L1 in and of itself does not. |
| | | 4.) Compared to other proposed expansion areas, those proposed for the La Center UGA are heavily constrained. |
| | | 5.) Again, compared to other proposed expansion areas, those proposed for the La Center UGA are heavily constrained. |
| Irish, Jim; Mayor | Follow up response to issues raised in public hearing on 9/20/06 | Comments noted. |
| Jacobsen, Dennis & Joella | Request for parcel #184843-000 @ 3117 NW 151st Street in V1 to be included in UGB and UR-10 to be lifted. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Johnson, Terry & Beth | Opposition to Alternatives #2 & #3 for Battle Ground region. | Comments noted. |
| Johnson, Todd | Request for CJ Dens properties to be included in Camas UGB. Parcel # 177905-000, 177906-000, 178172-000, & 178236-000. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Johnson, Todd | *COPY-DUPLICATE* Request for CJ Dens properties to be included in Camas UGB. Parcel # 177905-000, 177906-000, 178172-000, & 178236-000. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |
| Johnston, Lynn | Request for inclusion of their 9 parcels totaling 260 acres in the Camas UGA. | This is a Site Specific Request to be included in the UGB. Noted for record; no response required. |