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futurewise.org

November 14, 2018

Mr. Steve Morasch, Chair  
Clark County Planning Commission  
c/o Sonja Wisser, Program Assistant  
Clark County Community Planning  
PO Box 9810  
Vancouver, WA 98666-9810

Dear Chair Morasch and Planning Commissioners:

**Subject: Comments on the Urban Holding Removal - Phase II and the 2018 Biannual Code Amendments.**

Sent via email to: [sonja.wisser@clark.wa.gov](mailto:sonja.wisser@clark.wa.gov)

Thank you for the opportunity to comment on the Urban Holding Removal - Phase II and the 2018 Biannual Code Amendments. While we support some of the amendments, we have concerns about certain amendments discussed below.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has supporters throughout Washington State including Clark County.

**Please do not recommend removal of the Urban Holding Overlay until the necessary transportation funding is assured.**

The Staff Report for this proposal documents that the Clark County Transportation Improvement Plan (TIP) does not ensure reasonable funding for the critical links and intersection modifications needed to lift the Urban Holding Overlay in this area.<sup>1</sup> Clark County's 20-year transportation facility plan has a \$158,104,000 deficit.<sup>2</sup> So other County transportation funding is not available to pay for these transportation facilities. Therefore, we urge the Planning Commission not to recommend removal of the Urban Holding Overlay until the necessary additional transportation funding is assured.

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<sup>1</sup> Staff Report to the Clark County Planning Commission Subject: CPZ2018-00021 Amendment of Comprehensive Plan and Zoning Maps to Remove Urban Holding Overlay – Phase 2 p. 2 of 10 (Nov. 15, 2018) accessed on Nov. 13, 2018 at: <https://www.clark.wa.gov/sites/default/files/dept/files/community-planning/CPZ2018-00021%20UH%20Holt%20Homes%20Staff%20Report%20Final.pdf>

<sup>2</sup> *Clark County Comprehensive Growth Management Plan 2015-2035* Chapter 5, Transportation p. 160 accessed on Nov. 13, 2018 at: <https://www.clark.wa.gov/community-planning/documents>

**Allow attached and internal Accessory Dwelling Units (ADUs) without requiring that they be counted towards the maximum allowed residential density. Only allow freestanding ADUs and guest houses outside of urban growth areas if they meet the minimum density requirements. Please see the 2018 Fall Biannual code amendments Attachment "A" Planning Commission review pp. 1 – 3 of 33**

Futurewise supports allowing internal and attached accessory dwelling units (ADUs) in rural areas without requiring that they be counted towards the maximum allowed residential density. These are ADUs located inside or attached to a house or in an accessory building, such as a garage, located close to the house. Detached or freestanding ADUs outside urban growth areas count towards and must comply with the maximum allowed density.<sup>3</sup> Detached or freestanding refers to separate dwelling units constructed on the same lot a primary dwelling. A county should analyze existing conditions, future projections, the need for ADUs, the impacts of future ADUs on public facilities and services, and the impacts of future ADUs on shorelines, critical areas, and resource lands before adopting development regulations that authorize ADUs outside of urban growth areas.<sup>4</sup> We have the same concern about guest houses, they must meet the minimum lots size and density requirements outside urban growth areas.

Allowing freestanding ADUs and guest houses without requiring that they meet the minimum lot size and density requirements effectively doubles the allowed rural density. The Washington State Department of Ecology (Ecology) has determined that “[t]here is limited water available for new uses in [Water Resource Inventory Area] WRIA 27” the Lewis River Watershed and “much of the water in the Lewis River Watershed has already been spoken for.”<sup>5</sup> The situation is the same in the Salmon-Washougal Watershed, WRIA 28. “There is limited water available for new uses ...” and “much of the water in this watershed has already been spoken for.”<sup>6</sup> In fact, water is in such short supply that there is already evidence that the overdevelopment of rural lands has caused farm wells to run dry.<sup>7</sup>

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<sup>3</sup> *Pierce County Neighborhood Association v. Pierce County (PNA II)*, CPSGMHB Case No. 95-3-0071, Final Decision and Order (March 20, 1996), at \*18 – 19 accessed on Jan. 18, 2018 at: <http://www.gmhb.wa.gov/Global/RenderPDF?source=casedocument&id=1923>; *Friends of the San Juans, Lynn Babrych and Joe Symons, et al. v. San Juan County*, WWGMHB Case No. 03-2-0003c Corrected Final Decision and Order and Compliance Order p.\*1, 2003 WL 1950153 p. \*1 (April 17, 2003). “The Thurston County Superior Court upheld the Board’s ruling regarding the requirement that a freestanding ADU must be counted as a dwelling unit for the purposes of calculating density on a resource parcel. See *Friends of the San Juans v. Western Washington Hearings Board*, Thurston County Cause No. 03-2-00672-3 (January 9, 2004) at 10 and 11.” *Friends of the San Juans, Lynn Babrych and Joe Symons v. San Juan County*, WWGMHB Case No. 03-2-0003c, Compliance Order 2005 (July 21, 2005), at 12 of 22, 2005 WL 2288088, at 7 accessed on Nov. 13, 2018 at: <http://www.gmhb.wa.gov/Global/RenderPDF?source=casedocument&id=277>

<sup>4</sup> *Friends of the San Juans, Lynn Babrych and Joe Symons, et al. v. San Juan County*, WWGMHB Case No.: 03-2-0003c Corrected Final Decision and Order and Compliance Order p.\*1, 2003 WL 1950153 p. \*1 (April 17, 2003).

<sup>5</sup> Washington State Department of Ecology Water Resources Program, *Focus on Water Availability Lewis River Watershed*, WRLA 27 p. 1 (Publication Number: 11-11-031 Revised Nov. 2016) accessed on Nov. 13, 2018 at: <https://fortress.wa.gov/ecy/publications/summarypages/1111031.html> and enclosed with this letter.

<sup>6</sup> Washington State Department of Ecology Water Resources Program, *Focus on Water Availability Salmon-Washougal Watershed*, WRLA 28 p. 1 (Publication Number: 11-11-032 Revised Nov. 2016) accessed on Nov. 13, 2018 at: <https://fortress.wa.gov/ecy/publications/summarypages/1111032.html> and enclosed with this letter.

<sup>7</sup> Val Alexander Letter to Clark County p. \*1 (May 24, 2016) enclosed with this letter.

When Ecology adopted the instream flow rules for WRIAs 27 and 28, Ecology established reserves for future domestic uses.<sup>8</sup> The reserves in Clark County can serve another 4,859 new households or occupied housing units.<sup>9</sup> However, Clark County currently has 5,042 existing vacant lots in the rural areas and on resource lands as of 2014.<sup>10</sup> Clark County Utilities prepared a map identifying potential water source for tax lots outside the urban growth areas. That map identified 6,175 vacant lots outside of urban growth areas not adjacent to public water mains.<sup>11</sup> So the County already has more lots than can be supported by the surface and ground water resources available in the rural areas and on resource lands. Allowing detached ADUs and guest houses without requiring that they meet the minimum lot size and density requirements will not protect surface and ground water quality and quantity as the Growth Management Act requires in RCW 36.70A.070(1) and (5)(c)(iv). In addition, RCW 36.70A.590 provides that “[d]evelopment regulations must ensure that proposed water uses are consistent with RCW 90.44.050 and with applicable rules adopted pursuant to chapters 90.22 and 90.54 RCW when making decisions under RCW 19.27.097 [deciding building permits] and 58.17.110 [deciding subdivisions].” The instream flow rules for WRIAs 27 and 28 were adopted pursuant to chapters 90.22 and 90.54 RCW. So, Clark County’s development regulations must ensure that proposed water uses are consistent with those rules. Allowing more lots than can be served with available water resources does not comply with this requirement.

The increased impervious surfaces allowed by freestanding ADUs and guest houses will also harm water quality. Research by the University of Washington in the Puget Sound lowlands has shown that when total impervious surfaces exceed five to 10 percent and forest cover declines below 65 percent of the basin, then salmon habitat in streams and rivers is adversely affected.<sup>12</sup> There are no limits preventing lots with detached ADUs from exceeding these thresholds. This will violate RCW 36.70A.070(1) and (5)(c)(iv) of the GMA.

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<sup>8</sup> Washington State Department of Ecology Water Resources Program, *Focus on Water Availability Lewis River Watershed, WRIA 27* p. 1 (Publication Number: 11-11-031 Revised Nov. 2016); Washington State Department of Ecology Water Resources Program, *Focus on Water Availability Salmon-Washougal Watershed, WRIA 28* p. 2 (Publication Number: 11-11-032 Revised Nov. 2016).

<sup>9</sup> Spreadsheet “WRIA 27-28 Reservations ESTIMATES w Totals for Clark County by Category” enclosed with this letter.

<sup>10</sup> *Clark County Buildable Lands Report* p. 13 (Revised 2017) and enclosed in a separate email with the filename: “061015WS\_2015BUILDABLE\_LANDS\_REPORT.pdf”

<sup>11</sup> Clark County Public Utilities, *Water Sources for Tax Lots Outside UGAs* accessed on Nov. 13, 2018 at: <https://www.clark.wa.gov/sites/all/files/community-planning/2016-update/Plan%20Adoption/07%20Water%20Sources%20for%20Taxlots%20Outside%20UGA.pdf> and enclosed in a separate email with the filename: “07 Water Sources for Taxlots Outside UGA.pdf.”

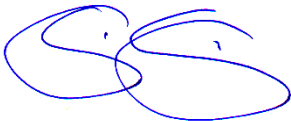
<sup>12</sup> Christopher W. May, Richard R. Horner, James R. Karr, Brian W. Mar, Eugene B. Welch, *The Cumulative Effects of Urbanization on Small Streams in the Puget Sound Lowland Ecoregion* pp. 19 – 20 of 26 (University of Washington, Seattle Washington) enclosed in a separate email with the filename: “chrisrdp.pdf.” This report was identified as best available science in Washington State Office of Community Development. *Citations of Best Available Science for Designating and Protecting Critical Areas* p. 17 (March 2002) accessed on Nov. 13, 2018 at: <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwiMgKWj2dLeAhViLH0KHXfdBB0QFjAAegQICBAC&url=https%3A%2F%2Fwww.ezview.wa.gov%2FDesktopModules%2FDocuments%2FView.aspx%3FtabID%3D36890%26alias%3D1949%26mid%3D68545%26ItemID%3D4092&usq=AOvVaw0UCCoZhWjqD2uPnyKdmsnY>. A copy of this report is enclosed in a separate email with the filename: “GMS-BAS-Citations-Final.pdf.”

**We support the amendment to UDC Subsections 40.520.010.E.1.b.(5) and 40.520.020.8.4.h. Please see the 2018 Fall Biannual code amendments Attachment "A" Planning Commission review pp. 6 – 8 of 33**

While certain exemptions to the requirement to subdivide land exempt those land divisions from the subdivision process, to be legal those lots must comply with the County's other development regulations. As the court of appeals wrote in *Estate of Telfer* "we emphasize that our holding is not to be understood as intimating that the parcels resulting from the division are exempt from any other land use regulations" other than the requirement to go through the short subdivision process.<sup>13</sup> The clarifying amendments proposed by staff makes this clear and reduces the potential that property owners will inadvertently create unbuildable lots. Therefore, we support the proposed clarifications.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 Ext. 102 and email: [tim@futurewise.org](mailto:tim@futurewise.org).

Very Truly Yours,



Tim Trohimovich, AICP  
**Director of Planning & Law**

Enclosures

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<sup>13</sup> *Estate of Telfer v. Bd. of Cty. Comm'rs of San Juan Cty.*, 71 Wn. App. 833, 837, 862 P.2d 637, 639 (1993) *review denied Estate of Telfer v. Bd. of Cty. Comm'rs of San Juan Cty.*, 123 Wn.2d 1028, 877 P.2d 695 (1994).

## Lewis River Watershed, WRIA 27

This focus sheet provides information on the availability of water for new uses in the Lewis River Watershed. This information provides a starting point for potential water users in determining the best strategies

This watershed consists of the Lewis River and numerous tributary creeks and streams. The lower Lewis Watershed is one of the most intensely farmed basins in western Washington. The annual precipitation in the Lewis Watershed ranges from 40 inches to over 150 inches per year. Most of this precipitation arrives during the winter months when overall water demands are the lowest. During the summer, snow pack is gone, there is little rain, and naturally low stream flows are dependent on groundwater inflow. This means that groundwater and surface water are least available when water demands are the highest.

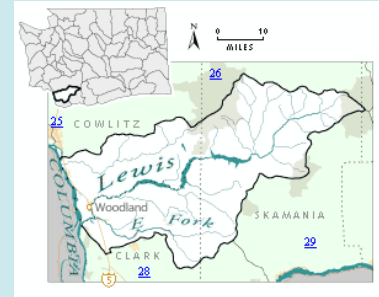
### Factors affecting water availability

There is limited water available for new uses in WRIA 27, especially given that river levels need to be maintained to ensure adequate water quality and fish migration. Additionally, Pacificorp has senior water rights to maintain reservoir levels in Lake Merwin and Yale Lake, and as a result, much of the water in the Lewis River Watershed has already been spoken for. Increased demands from population growth, low summer and early fall streamflow levels, and impacts from climate change add to the challenge of finding new water supplies in WRIA 11, especially during the summer months.

[Chapter 173-527 WAC](#) is the instream flow rule for the Lewis River Watershed, including the Kalama, the North Fork of the Lewis River, and the East Fork of the Lewis River, and associated creeks. This rule establishes:

- Instream flows on streams (See [Chapter 173-527-060 WAC](#)).
- Closes all streams (See [Chapter 173-527-070 WAC](#)).

Reserves are established in subbasins for future domestic uses. To access these reserves for new appropriations, applicants must meet the mitigation requirements of the WRIA 27 established guidelines.



### Definitions

**Instream flows:** Flow levels adopted into an administrative rule that create a water right for the stream to protect fish, wildlife, stock watering, recreational uses, and other instream uses and values. Typical instream flow rules now include broader water management strategies.

**Mitigation Plan:** A scientifically-sound plan to offset the impacts of a proposed water use.

**Permit-exempt well:** RCW 90.44.050 allows for use of small amounts of groundwater for specific uses without going through the regular permitting process. While exempt from the permitting process, these withdrawals are still subject to all other state water laws.

**WRIA:** Water Resources Inventory Area; also known as a watershed or river basin. For environmental administration and planning purposes, Washington is divided up into 62 major watersheds, or WRIsAs.

For information on the mitigation requirements, contact your county permitting department.

Applicants seeking new water appropriations for other uses will likely need to mitigate for the impacts their proposed water use will have on surface water bodies.

### **Water supply available for new uses**

Accessing municipal supplies or larger private water supply companies is the fastest and simplest option for obtaining a water supply.

All land west of Interstate 5, north of the east Fork of the Lewis River, and east of the Lewis River mainstem, and all lands west of Interstate 5, north of the Lewis River mainstem, and within the Lower Lewis subbasin are considered part of a “regional groundwater supply area” (per WAC 173-527-090) and is considered to be a location where water is potentially available on a year-round basis.

Additional options for finding a water supply include processing a water right application through the Cost Reimbursement Program. [www.ecy.wa.gov/pubs/0511016.pdf](http://www.ecy.wa.gov/pubs/0511016.pdf). Reserves are established in the instream flow rule. Applicants may need to develop mitigation to offset the impacts of their water use to surface water if their new use is not for domestic supply. In addition the Lower Columbia mitigation guidance requirements will apply.

The groundwater permit exemption allows certain users of small quantities of ground water (most commonly single residential well owners) to construct wells and develop their water supplies without obtaining a water right permit from Ecology. For more information about the groundwater permit exemption, refer to [www.ecy.wa.gov/pubs/fwr92104.pdf](http://www.ecy.wa.gov/pubs/fwr92104.pdf).

For more information on these and other options, refer to “Alternatives for Water Right Application Processing” <http://www.ecy.wa.gov/pubs/1111067.pdf>

### **Pending water right applications in this watershed**

Washington water law is based on the “prior appropriation” system, often called “first in time, first in right.” Applications for water from the same source must be processed in the order they are received.

Ecology asks anyone who needs a water right (new, change, or transfer) to submit the pre-application consultation form and meet with us to review your water supply needs and project proposal.

- Apply for a New Water Right  
<http://www.ecy.wa.gov/programs/wr/rights/newrights.html>
- Apply to Change or Transfer a Water Right or Claim  
[http://www.ecy.wa.gov/programs/wr/rights/change\\_transfer\\_use.html](http://www.ecy.wa.gov/programs/wr/rights/change_transfer_use.html)

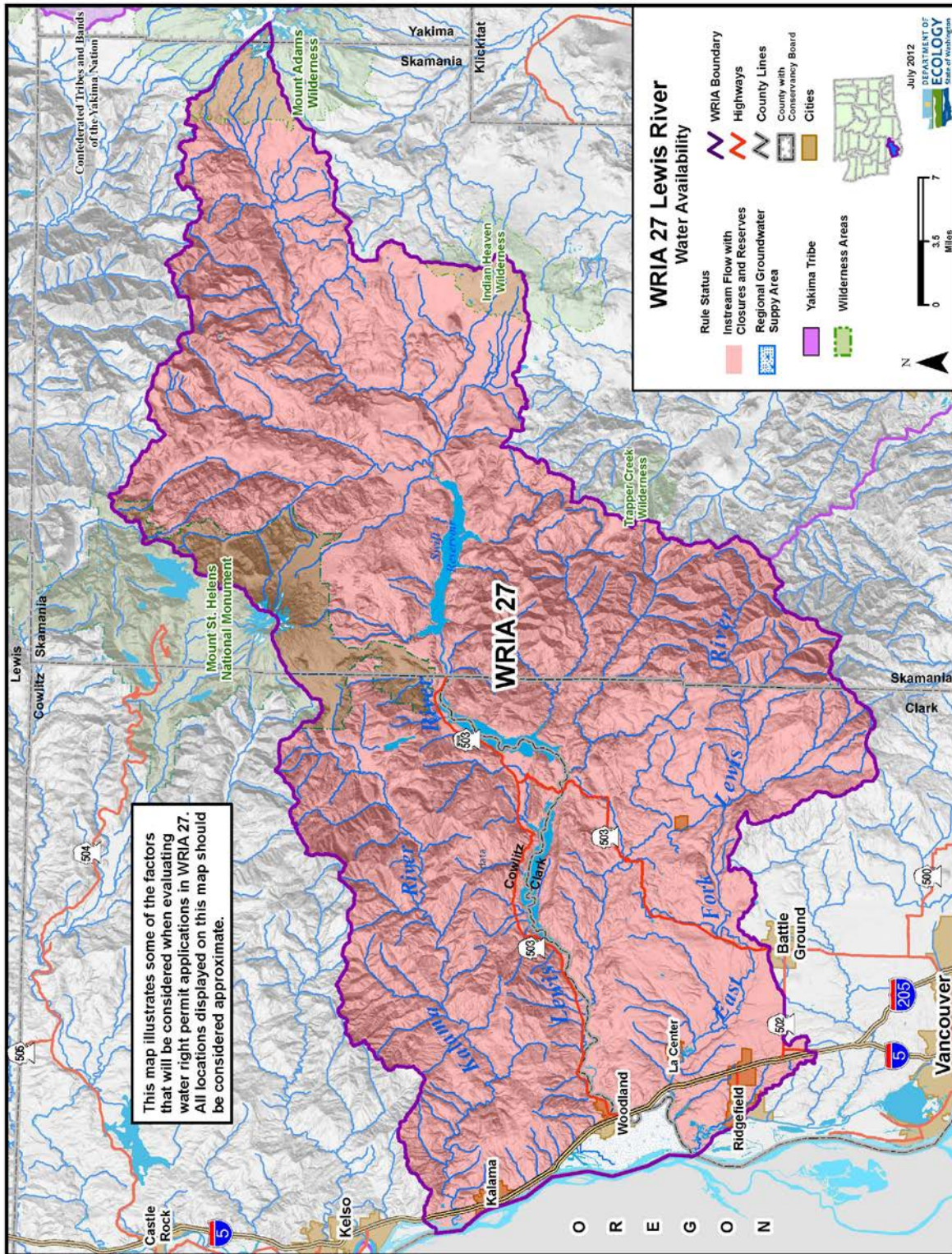
The map in this document shows some of the factors that will be considered when evaluating water right permit applications. Here are some information sources to assist you with your research:

- Locate and research water rights on land parcels anywhere in the state (Water Resource Explorer)  
<http://www.ecy.wa.gov/programs/wr/info/webmap.html>
- Pending Water Right Applications by County  
<http://www.ecy.wa.gov/programs/wr/rights/tracking-apps.html>
- Subscribe to a water right application RSS feed for a county or WRIA  
[http://www.ecy.wa.gov/programs/wr/rights/wr\\_app\\_rss.html](http://www.ecy.wa.gov/programs/wr/rights/wr_app_rss.html)
- WRIA map showing the total number of water right claims, certificates, permits and applications  
<http://www.ecy.wa.gov/programs/wr/rights/Images/pdf/waterright-wria-maps.pdf>
- Search and view well reports using a variety of search tools  
<https://fortress.wa.gov/ecy/waterresources/map/WCLSWebMap/default.aspx>

### **For more information**

Ecology Southwest Regional Office  
300 Desmond Drive  
Lacey, WA 98503  
360-407-6300

*If you need this document in a version for the visually impaired, call the Water Resources Program at 360-407-6872.  
Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341*





## Salmon-Washougal Watershed, WRIA 28

This focus sheet provides information on the availability of water for new uses in the Salmon-Washougal Watershed. This information provides a starting point for potential water users in determining the best strategies for securing water for a future project or proposal in this area.

The Salmon-Washougal Watershed is located in southwest Washington, and includes Salmon Creek, Washougal River and numerous tributary creeks and streams. Annual precipitation in the watershed ranges from 40 to 80 inches. Most of this precipitation arrives during the winter months when water demands are the lowest, and only a fraction becomes available for human and economic uses. Little of the Salmon-Washougal Watershed benefits from snowpack so during the summer when there is little rain naturally, low stream flows are dependent on groundwater inflow. This means that groundwater and surface water are least available when water demands are the highest.

### Factors affecting water availability

This watershed is one of the most intensely populated basins in western Washington, and as a result much of the water in this watershed has already been spoken for. There is limited water available for new uses, especially given that river and stream levels need to be maintained to ensure adequate water quality and fish migration. Increased demands from population growth, declining summer and early fall streamflow levels, and impacts from climate change add to the challenge of finding new water supplies in WRIA 28.

[Chapter 173-528 WAC](#) is the instream flow rule for the Salmon Creek and Washougal River watershed, including: Rock Creek, Fifth Plain Creek, Lacamas Creek, Little Washougal River, West Fork of the Washougal River, and associated creeks. Additionally, Gibbons, Lawton, Duncan, Hardy, Hamilton, and Green Leaf creeks, located east of the Washougal River watershed are considered part of this watershed.



### Definitions

**Instream flows:** Flow levels adopted into an administrative rule that create a water right for the stream to protect fish, wildlife, stock watering, recreational uses, and other instream uses and values. Typical instream flow rules now include broader water management strategies.

**Mitigation:** A plan intended to avoid impairment to existing water rights or provide offsets to surface water depletion.

**Water Resource Inventory Area (WRIA):** one of 62 watershed areas in Washington State typically containing one or more river basins.

The instream flow rule:

- Establishes instream flows on streams ([See WAC 173-528-060](#)).
- Closes all streams ([See WAC 173-528-070](#)).
- Creates reserves for future domestic uses.

To access the reserves for new appropriations, contact your county permitting department.

Applicants seeking new water appropriations for other uses will likely need to provide mitigation to offset the impacts their proposed water use will have on surface water bodies.

### **Water supply available for new uses**

Potential water supply in the Salmon-Washougal Watershed includes municipal suppliers and private water supply companies. New individual homes may access water through a permit-exempt well for indoor use. (See RCW 90.44.050 for information on permit-exempt groundwater withdrawals.)

If an applicant is not able to connect to an existing water system or more water is needed than can be obtained from a permit-exempt well, then the water right application may be processed through the [Cost Reimbursement Program](#).

For more information on these and other options, refer to “[Alternatives for Water Right Application Processing](#).”

### **Pending water right applications in this watershed**

Washington water law is based on the “prior appropriation” system, often called “first in time, first in right.” Applications for water from the same source must be processed in the order they are received.

Ecology asks anyone who needs a water right (new, change, or transfer) to submit the pre-application consultation form and meet with us to review your water supply needs and project proposal.

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- Apply to Change or Transfer a Water Right or Claim  
[http://www.ecy.wa.gov/programs/wr/rights/change\\_transfer\\_use.html](http://www.ecy.wa.gov/programs/wr/rights/change_transfer_use.html)

The map in this document shows some of the factors that will be considered when evaluating water right permit applications. Here are some information sources to assist you with your research:

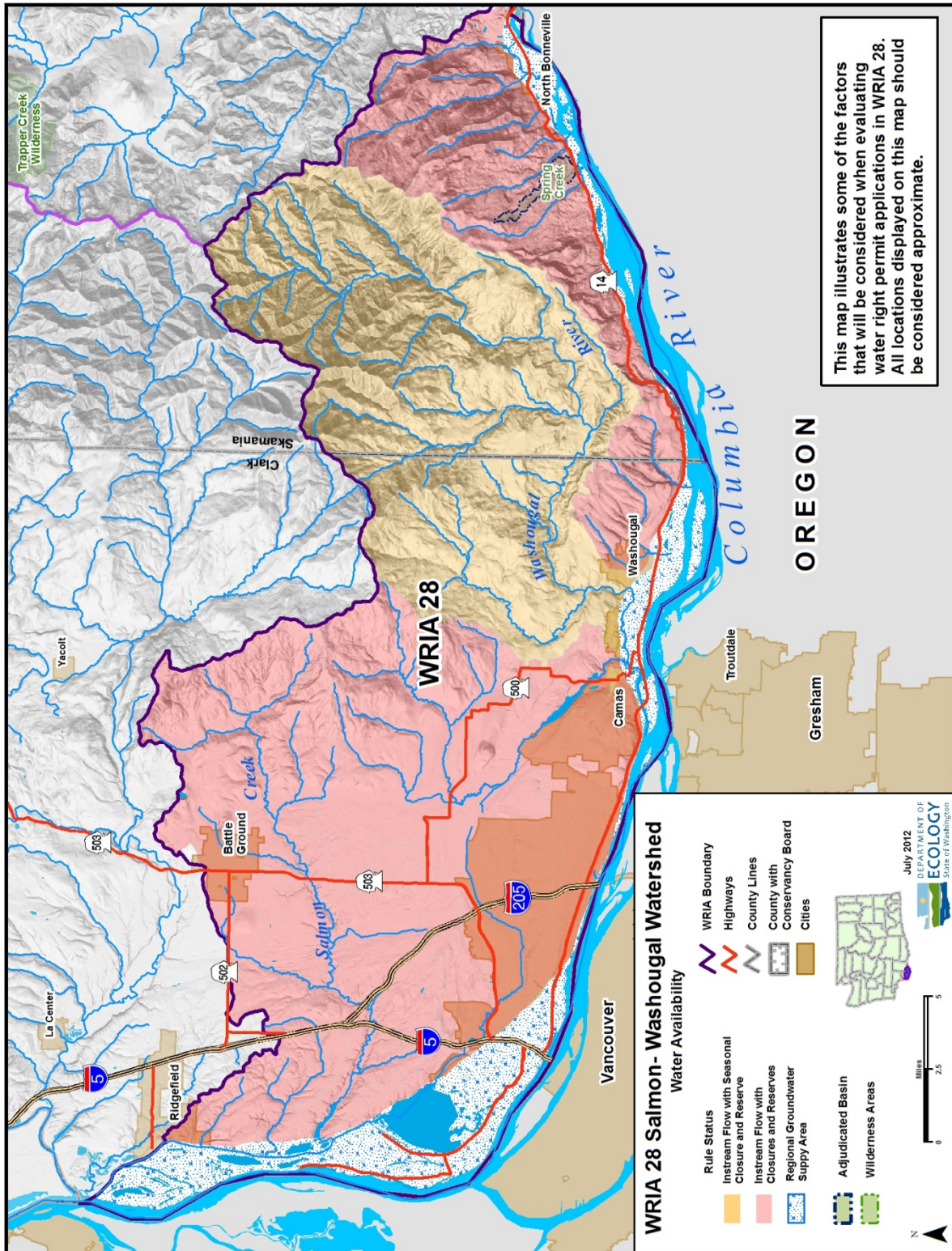
- Locate and research water rights on land parcels anywhere in the state (Water Resource Explorer)  
<http://www.ecy.wa.gov/programs/wr/info/webmap.html>

- Pending Water Right Applications by County  
<http://www.ecy.wa.gov/programs/wr/rights/tracking-apps.html>
- Subscribe to a water right application RSS feed for a county or WRIA  
[http://www.ecy.wa.gov/programs/wr/rights/wr\\_app\\_rss.html](http://www.ecy.wa.gov/programs/wr/rights/wr_app_rss.html)
- WRIA map showing the total number of water right claims, certificates, permits and applications  
<http://www.ecy.wa.gov/programs/wr/rights/Images/pdf/waterright-wria-maps.pdf>
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Val Alexander  
2404 NW Coyote Ridge Rd  
La Center, WA 98629



May 24, 2016

The Honorable Marc Boldt, Council Chair  
Clark County Board of County Councilors  
PO Box 5000  
Vancouver, Washington 98666-5000

Mr Steve Morasch, Chair  
Clark County Planning Commission  
Clark County Community Planning

Attn: 2016 Comp Plan Record  
PO Box 9810  
Vancouver, Washington 98666-9810

Dear Council Chair Boldt, Councilors Madore, Mielke, Olson, and Stewart,  
Planning Commission Chair Morasch, and Planning Commissioners Wright,  
Blom, Quring, Barca, Johnson, and Bender:

I have lived on my property NW of La Center for more than 50 years. I have seen many changes through the years, as lots were developed around me. Almost all of them were 5 acre lots, so that was quite a few new wells to be drilled. I had a good supply of water from my first well, until more and more houses were allowed. Suddenly, my well dried up.

I did everything I could to bring it back, had it fracked and some other techniques used then, in the 70's to assist well output, but nothing worked. By this time I had bought some other property around me and so I had to pipe water from another well at the south end to the northern property where I had a house. I am one of the lucky ones, since I could do that. Most other people do not have that option.

For those of you who will be deciding on which option to choose, I'm hoping you will take seriously the damage that will be done to existing rural residents if you allow 8024 new families to establish homes in rural Clark County. There is a crisis in the ground water supply in the

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county as indicated by Dennis Dykes, a hydrologist, and Ecology. To take the risk that many existing homes will lose their water supply is incredibly irresponsible. Try to put yourself in that situation. Some would have to move away, abandon their homes, since one couldn't easily sell a lot without a water supply. You will have to choose between protecting the present rural residents or trying to please a small group of vocal, greedy landowners who want to profit from land sales.

One of your responsibilities is to protect farmland, and farmers cannot make a living by having to pay for public water.

Please study the water situation as described by Ecology and Dennis Dykes, before you ignore the needs of present residents who have no access to public water.

Thank you,

Val Alexander



Wed 10/14/2015 3:59 PM

Hoff, Tryg (ECY) <THOF461@ECY.WA.GOV>

RE: Q about remaining water reserves for residential uses in WRIAs 27 and 28 in Clark Co

To: Tim Trohimovich

You forwarded this message on 10/14/2015 5:21 PM.

Message WRIA 27-28 Reservations ESTIMATES.xlsx (14 KB) WRIA27withReservations.jpg (2 MB) WRIA28withReservations.jpg (2 MB)

[Bing Maps](#)

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Here are our estimates at the end of June this year

Let me know if you have any questions.

Tryg

WRIA 27-28 as of June 2015

|   | Reservation Benefit (CFS) | Households Served | New Water Wells (ecy) | Public est* systems(doh) | CFS Permitted | TOTAL | RESERVATION % Used | Remaining Household Capacity |
|---|---------------------------|-------------------|-----------------------|--------------------------|---------------|-------|--------------------|------------------------------|
| <b>Kalama River Subbasin</b>  |                           |                   |                       |                          |               |       |                    |                              |
| Kalama  | 1.92                      | 1551              |                       |                          |               | 0     | 0.0%               | 1,551                        |
| Small Community Water Systems - Cowlitz Co.                                 | 0.37                      | 299               | 1                     |                          |               | 1     | 0.3%               | 298                          |
| Domestic Wells - Cowlitz Co. NA 141 0.52 0.16 0.00 0.16                     | 0.16                      | 432               | 48                    |                          |               | 48    | 11.1%              | 384                          |
| <b>North Fork Lewis River Subbasin</b>                                      |                           |                   |                       |                          |               |       |                    |                              |
| Small Community Water Systems - Cowlitz Co.                                 | 0.37                      | 299               | 1                     |                          |               | 1     | 0.3%               | 298                          |
| Small Community Water Systems - Clark Co.                                   | 0.75                      | 606               | 3                     |                          |               | 3     | 0.5%               | 603                          |
| Small Community Water Systems - Skamania Co.                                | 0.4                       | 323               | 0                     |                          |               | 0     | 0.0%               | 323                          |
| Domestic Wells - Cowlitz Co.  | 0.07                      | 189               | 82                    |                          |               | 82    | 43.4%              | 107                          |
| Domestic Wells - Clark Co.  | 0.12                      | 324               | 81                    |                          |               | 81    | 25.0%              | 243                          |
| Domestic Wells - Skamania Co.   | 0.4                       | 1080              | 0                     |                          |               | 0     | 0.0%               | 1,080                        |
| Commercial - Skamania County  | 0.21                      |                   | 0                     |                          |               | 0     |                    | 0                            |
| Ridgefield (Not applicable, due to location in tidally influenced area. (8) |                           |                   |                       |                          |               |       |                    | 0                            |
| <b>East Fork Lewis River Subbasin</b>                                       |                           |                   |                       |                          |               |       |                    |                              |
| CPU, Battle Ground and Ridgefield   | 4.4                       | 3554              |                       |                          | 0.67          | 0     | 15.2%              | 3,554                        |
| Small Community Water Systems - Clark Co.                                   | 0.37                      | 299               | 2                     | 19                       |               | 21    | 7.0%               | 278                          |
| Small Community Water Systems - Skamania Co.                                | 0                         | 0                 | 0                     |                          |               | 0     | 0.0%               | 0                            |
| Domestic Wells - Clark Co.  | 0.47                      | 1269              | 122                   |                          |               | 122   | 9.6%               | 1,147                        |
| Domestic Wells - Skamania Co.   | 0.02                      | 54                | 0                     |                          |               | 0     | 0.0%               | 54                           |
| <b>Salmon Creek Subbasin</b>  |                           |                   |                       |                          |               |       |                    |                              |
| CPU, Battle Ground and Ridgefield   | 0.25                      | 202               | 7                     |                          |               | 7     | 3.5%               | 195                          |
| Small Community Water Systems - Clark Co.                                   | 0                         | 0                 | 0                     |                          |               | 0     |                    | 0                            |
| Domestic Wells - Clark Co.  | 0.12                      | 324               | 92                    |                          |               | 92    | 28.4%              | 232                          |
| <b>Burnt Bridge Creek Subbasin</b>  |                           |                   |                       |                          |               |       |                    |                              |
| Vancouver   | 0                         | 0                 | 0                     |                          |               | 0     | 0.0%               | 0                            |
| Small Community Water Systems - Clark Co.                                   | 0                         | 0                 | 0                     |                          |               | 0     | 0.0%               | 0                            |
| Domestic Wells - Clark Co.  | 0                         | 0                 | 0                     |                          |               | 0     | 0.0%               | 0                            |
| <b>Lacamas Creek Subbasin</b>   |                           |                   |                       |                          |               |       |                    |                              |
| Camas   | 1                         | 808               |                       |                          |               | 0     | 0.0%               | 808                          |
| Clark Public Utilities (CPU)  | 0.6                       | 485               |                       |                          |               | 0     | 0.0%               | 485                          |
| Small Community Water Systems - Clark Co.                                   | 0.37                      | 299               | 3                     | 8                        |               | 11    | 3.7%               | 288                          |
| Domestic Wells - Clark Co. NA   | 0.17                      | 459               | 71                    |                          |               | 71    | 15.5%              | 388                          |
| <b>Washougal River Subbasin</b>   |                           |                   |                       |                          |               |       |                    |                              |
| Washougal   | 0                         | 0                 |                       |                          |               | 0     | 0.0%               | 0                            |
| Small Community Water Systems - Clark Co.                                   | 0.37                      | 299               |                       | 10                       |               | 10    | 3.3%               | 289                          |
| Small Community Water Systems - Skamania Co.                                | 0.2                       | 162               |                       |                          |               | 0     | 0.0%               | 162                          |
| Domestic Wells - Clark Co.  | 0.17                      | 459               | 32                    |                          |               | 32    | 7.0%               | 427                          |
| Domestic Wells - Skamania Co.   | 0.64                      | 1728              | 26                    |                          |               | 26    | 1.5%               | 1,702                        |
| <b>Columbia River Tributaries Subbasin</b>                                  |                           |                   |                       |                          |               |       |                    |                              |
| Small Community Water Systems - Clark Co.                                   | 0.21                      | 170               | 0                     |                          |               | 0     | 0.0%               | 170                          |
| Small Community Water Systems - Skamania Co.                                | 0.21                      | 170               | 3                     |                          |               | 3     | 1.8%               | 167                          |
| Domestic Wells - Clark Co.  | 0.12                      | 324               | 14                    |                          |               | 14    | 4.3%               | 310                          |
| Domestic Wells - Skamania Co.   | 0.12                      | 324               | 10                    |                          |               | 10    | 3.1%               | 314                          |
| <b>Total</b>  | <b>14.58</b>              | <b>16,490</b>     |                       |                          |               |       |                    | 15,855                       |

|   |       |
|---|-------|
| Cities in Clark County                    | 808   |
| CPU for Cities                            | 3,749 |
| Clark Public Utilities (CPU)              | 485   |
| Small Community Water Systems - Clark Co. | 1,627 |
| Domestic Wells - Clark Co.                | 2,747 |
| Total Outside Cities                      | 4,859 |