



**Nisqually Indian Tribe
4820 She-Nah-Num Dr. S.E.
Olympia, WA 98513
(360) 456-5221**

June 25, 2019

Oliver Orjiako, Director
Clark County Community Planning
1300 Franklin St.; 3rd Floor
PO Box 8910
Vancouver, WA 98666

Dear Mr. Orjiako

The Nisqually Indian Tribe thanks you for the opportunity to comment on:

**Re: CPZ2019-00024 (Wollam), Phase IV – Amend Comprehensive Plan to
remove Urban Holding Overlay near the I-5/178th Street Interchange**

The Nisqually Indian Tribe has reviewed the report you provided for the above-named project. The Nisqually Indian Tribe has no further comments or concerns at this time. Please keep us informed if there are any Inadvertent Discoveries of Archaeological Resources/Human Burials.

Sincerely,

Brad Beach
THPO Department
360-456-5221 ext 1277
beach.brad@nisqually-nsn.gov

Annette “Nettsie” Bullchild
THPO Department
360-456-5221 ext 1106
bullchild.annette@nisqually-nsn.gov

Jeremy “Badoldman” Perkuhn
THPO Department
360-456-5221 ext 1274
badoldman.jp@nisqually-nsn.gov



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th Street, Ridgefield, WA 98642
Telephone: (360) 696-6211 • Fax: (360) 906-6776

July 2, 2019

Matt Hermen
Clark County
1300 Franklin Street
Vancouver, WA 98660

RE: WDFW Comments for the Comprehensive Plan Urban Holding Overlays: Reference CPZ2018-00021, CPZ2019-00023, and CPZ2019-00024

Dear Mr. Hermen:

Thank you for the opportunity to provide comments on the proposed removal of the urban holding overlays on the above referenced actions. We appreciate the thoughtful process Clark County (hereafter 'the County') uses in managing these urbanizing areas and share your value of maintaining the functions of critical areas.

We have no objections of removing the overlay from the two proposed locations and providing safeguards necessary for protecting the function of the critical areas within and adjacent to those locations. As the land is further developed, we encourage you to use your land use authority to ensure adequate designation and protection of areas to provide for No Net Loss of Critical Area functions.

Thank you for the opportunity to participate in this process. Please feel free to contact me if you have any questions. (360) 906-6764.

Best Regards,

A handwritten signature in blue ink, appearing to read "Chuck Stambaugh-Bowey", is written over a faint, larger signature.

Chuck Stambaugh-Bowey, CWB
Assistant Regional Habitat Program Manager

August 14, 2018

Dr. Oliver Orjiako
Director
Clark County Department of Community Planning
Public Services Building
Vancouver, Washington 98660

RE: Determination of Non-Significance Amend Comprehensive Plan to
remove Urban Holding Overlay near the I5/179th Street interchange
Phase I

Sent via e-mail pdf to Oliver.Orjiako@clark.wa.gov

Dear Dr. Orjiako:

I am submitting these comments as an individual and not on behalf of any particular group, political party or organization. These comments assert that a checklist and DNS is an inadequate environmental review in this case for the reasons stated below. "Non-project" proposals are subject to SEPA, the lead agency cannot conduct an environmental review of a non-project proposal under the assumption that there will be no direct and/or indirect environmental impacts, including potential cumulative impacts from the "non-project" action. When a action such as this one is proposed, it should still be subject to a comprehensive review of potential environmental impacts from reasonably foreseeable developments, especially where the action to be taken will increase the intensity of developments in areas that specifically restricted developments until certain prerequisites for removal of the overlay have been met.

First, the area in Urban Holding subject to this review is in Urban Holding due to lack of infrastructure available for development of the underlying zoning, in this case Mixed Use zoning. I believe, and can supplement the record, that this holding was put in place as part of the original comprehensive plan from 1994. The current overlay covers a large swath of area surrounding the 179th Street/I5 interchange.

It appears that this "non-project" action is the County's initial attempt to remove the current overlay in a piecemeal fashion with no comprehensive plan for the entire area subjected to the Urban Holding Overlay. It even designates this "non-project" action as "Phase I" and therefore, it is clear that the County anticipates specific growth, and specific cumulative actions, but anticipates them occurring in a piecemeal basis. It is

assumed that the County seeks to allow certain developers, pursuant to development agreements that may or may not be subject to public review, the ability to consume any existing capacities that may exist for smaller "cut-out" projects without considering the overlay as a whole, which would selectively allow some development while excluding other developments leading to disparate treatment of landowners in the area and could cause greater expense to landowners who are forced into plans previously approved by the Council pursuant to the piecemeal development agreements.

Second, this "non-project" action involves a modification of an existing environment designated under the Growth Management Act planning process by a proposal to amend the comprehensive plans and to, at least partially, remove the overlay on this area but does not discuss the development of new transportation plans along with potential new ordinances, rules, and regulations and environmental impacts that will be concomitant to the piecemeal implementation of these development agreements.

Third, according to the checklist, this SEPA (which claims no impacts to the environment) fails to consider the impacts of the the proposed development but states that the action is based upon "the execution of a development agreement" that, at this stage, does not exist or has not been put into the public record. Thus, it is clear that there will be impacts (at least a minimum of 402 trips per day) and it is impossible for the public to comment on the proposal's impact on the environment if there is no discussion of the development under the propose

Moreover, a recent work session with the Council exhibited that there were many other possible projects and development agreements being proposed in the impacted area around the 179th street interchange. Based upon a review of the materials presented to the county, the following have/are being proposed:

Killian 60,000 Sq. Ft. Retail (DA Approved Phase 1)

- Killian Three Creeks North Phase 1– (DA in progress)
- Killian remainder Phase 2 - NE 179th Street Commercial Center (DA Approved Phase 2)
- Holt Mill Plain PUD (606 homes/99 townhomes)
- Hinton Property (129 homes)
- Wollam Property (220 homes)

See The Grid Materials from 7/11/18 WS and audio of that work session all of which are incorporated into these comments by reference¹.

¹ It is unclear to me at this point if this current SEPA is for one of those proposed developments.

However, there has been no comprehensive analysis of traffic impacts or the impacts of the contemplated infrastructure and developments on the existing environment as required by SEPA and, if one has been completed, it has not been adopted by the County and is not incorporated into this SEPA document.

Therefore, this SEPA review for this non-project actions fails in many ways including failing to consider conduct a comprehensive analysis of the reasonably foreseeable impacts, failing to address the cumulative impacts of all of these developments that are being proposed, failing to consider any possible alternatives and failing to outline any potentially successful mitigation measures.

Fourth, the DNS/Checklist lists no other actions that have been taken by the County regarding the Urban Holding in general and this parcel specifically. Presumably, there have been other determinations, and reviews of those determinations by the Growth Management Hearings Board(s). If other decisions, papers, determinations, environmental reviews etc. have been completed by the County regarding this parcel specifically, and the overlay in general, then those documents should be made a part of and/or referenced in the environmental review for this proposed Comprehensive Plan amendment. If those do exist, the DNS/Checklist does not, but should, list the other relevant environmental documents/studies/models that have been done regarding the Urban Holding area since it was placed under the Urban Holding overlay. For example, a county's EIS for its comprehensive plan may have information relevant to the Urban Holding Overlay. In addition, there should be other county, Growth Board and/or appellate court references to the Urban Holding Overlay and the reason(s) that it has not been removed over the years.

Fifth, there is no description of any alternatives much less a range of alternative or preferred alternative or any description of if a particular alternative was fully implemented (including full build-out development, redevelopment, changes in land use, density of uses, management practices, etc.), any description of where and how it would direct or encourage demand on or changes within elements of the human or built environment, as well as the likely affects on the natural environment. In addition, the document fails to identify where the change or affect or increased demand might or could constitute a likely adverse impact, or any description of any further or additional adverse impacts that are likely to occur as a result of those changes and affects.

Sixth, this checklist cannot serve as an environmental analysis for later project reviews because it has been created in a way that does not anticipate any such projects where, in contrast, the county definitely is contemplating such projects. The more detailed and complete the environmental analysis is during the "non-project" stage, the less review will needed during project review and, therefore, any project review can focus on those environmental issues not adequately addressed during the "non-project" stage. The current checklist and DNS fails to provide any analysis that could be utilized later at a proposed project phase and fails to give notice to the citizen of the real potential

environmental impacts that will occur once the Urban Holding Overlay is lifted and projects can proceed.

Currently, given the potential development agreements listed above, along with others that may not be in the public realm, there is ample ability for the lead agency to anticipate and analyze the likely environmental impacts of taking this action and the failure to do so creates an inadequate SEPA document (for example a minimum of 2500 peak hour trips if the developers' numbers are to be believed in the documents that they submitted in the July work session). Failure to conduct a full environmental review at this juncture allows for the removal of the overlay while precluding the public to speak to the removal of the overlay at all. Plus, once this overlay is removed, the question arises as to whether the removal of all the other portions of the overlay must be removed either piecemeal or as a whole through this "non-project" action that has no real environmental review or input from the public.

Although an environmental checklist can act as a first step in an environmental process, including Part D, Supplemental Sheet for "non-project" activities it should not stand in the way of a more comprehensive environmental impact statement, especially in this case given the large areas under the urban holding overlay that are obviously intended to be subject to removal only upon meeting specific prerequisites. Further, there has been no analysis of the traffic impacts on 179th street, 15th Avenue and/or the 179th street intersection by the current proposal(s) by the lead agency. A full environmental review, that includes all known proposed projects, along with the impact of full build-out should the entire overlay be removed, should be conducted prior to the removal of any portion of the overlay.

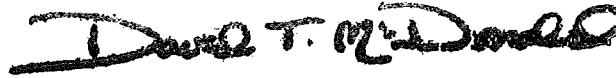
These comments assert that this "non-project" SEPA proposal review should also 1) consider all existing regulations, 2) set forth the underlying rational behind the fact that there is an Urban Holding Overlay in existence, 3) the reason for the overlay being placed on the area, 4) remove it from the overlay and 5) the requirements that are required to remove the overlay as well as and 6) any other development under consideration. Plus the environmental review should include an analysis of the potential impacts of the entire area once the overlay is lifted in the larger area surrounding the 179th Street interchange, there will be a plethora of impacts, including but not limited to traffic impacts.

Therefore, this "nonproject" action involves a comprehensive plan amendment, or similar proposal governing future project development, and the probable environmental impacts that would be allowed for the future development need to be considered. The environmental analysis should analyze the likely impacts of the of build-out of all the underlying zones covered by the overlay when determining the efficacy of allowing this one "non-project" to have the overlay removed. In addition, the proposal should be described in terms of alternative means of accomplishing an objective.

Dr. Oliver Orjiako
Page 5
August 14, 2018

Thank you for your consideration of these comments. Please submit them
for the record.

Best Regards,

A handwritten signature in black ink, appearing to read "David T. McDonald". The signature is stylized with a large, sweeping initial "D" and a prominent horizontal line across the middle.

David McDonald

David T. McDonald
2212 NW 209th Street
Ridgefield, Washington 98642

July 5, 2019

Dr. Oliver Orjiako
Director
Clark County Department of Community Planning
Public Services Building
Vancouver, Washington 98660

RE: Determination of Non-Significance Amend Comprehensive Plan to
remove Urban Holding Overlay near the I5/179th Street interchange
(Hinton Phase III and Wollam Phase IV)

Sent via e-mail pdf to Oliver.Orjiako@clark.wa.gov

Dear Dr. Orjiako:

I am submitting these comments as an individual and not on behalf of any particular group, political party or organization. These comments assert that a checklist and DNS is an inadequate environmental review in these cases for the reasons stated below. "Non-project" proposals are subject to SEPA, the lead agency cannot conduct an environmental review of a non-project proposal under the assumption that there will be no direct and/or indirect environmental impacts, including potential cumulative impacts from the "non-project" action. When actions such as these are proposed, it should still be subject to a comprehensive review of potential environmental impacts from reasonably foreseeable developments, especially where the action to be taken will increase the intensity of developments in areas that specifically restricted developments until certain prerequisites for removal of the overlay have been met.

There are several issues that arise with the piecemeal SEPA review process being conducted by the County and the Clark Regional Wastewater District. I am adopting by reference the letter dated August 14, 2018, a copy of which is attached and incorporated by this reference, which sets forth some of the concerns that are now compounded by the fact that these projects can no longer be considered "non-projects" and should include, at a minimum, the combined environmental impacts of all of the

current projects (Wollam, Hinton, Mill Creek (Holt)¹ and Three Creeks (Killian) at build-out as those projects are a reality despite the “non-project” designation. In addition, I am adopting by reference the records from various planning commission hearings, and Council Hearings/Council Time meetings and Work Sessions on Amending the Comprehensive Plan to remove Urban Holding Overlay near the I5/179th Street interchange including but not limited to all of the documents and audio records posted on the Grid on or between January 1, 2018 and the date of this letter. In addition, these environmental review should also incorporate the proposed annexation of properties into the Clark Regional Wastewater District (a copy of that document is filed concomitantly with this document and is incorporated by this reference).

At the outset, these projects are not properly defined as required by WAC 197-11-060(3) as they are not described in a way that encourages “considering and comparing alternatives” and does not describe the proposal in terms of “objectives rather than preferred solutions”. See WAC 197-11-060(3)(a)(iii). In addition, these proposals violate WAC 197-11-060(3)(b). Under that provision, “proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action, shall be evaluated *in the same environmental document*. *Id.* Although “phased review” is allowed in some circumstances [See WAC 197-11-060(5)]. In this case, §§ 5 is inapplicable because all of these projects are inextricably intertwined by the need for the universal removal of the urban holding and the expenditure of a minimum of \$66.2² million dollars to meet concurrency standards under GMA and the projects:

- (i) Cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or
- (ii) Are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation.

WAC 197-11-060(3)(b)(i) and (ii).

In addition to failing to include all the projects in the area under one comprehensive “project” (as opposed to “non-project”) environmental review, the documents fail to address all of the impacts as defined by WAC 197-11-060(4)(c)(a

¹ https://www.clark.wa.gov/sites/default/files/dept/files/council-meetings/2019/2019_Q3/071619_MillCreekMasterPlanNarrative%3B%20Ex_BtoDA.pdf, and https://www.clark.wa.gov/sites/default/files/dept/files/council-meetings/2019/2019_Q3/071619_MillCreekMasterPlanNarrative%3B%20Ex_BtoDA.pdf

² In addition, there is information that the Council is no considering expanding the project area and adding an additional 97 million dollars worth of infrastructure, predominantly roads, to the current project. See https://www.clark.wa.gov/sites/default/files/dept/files/council-meetings/2019/2019_Q2/061219WS_179St_I5_FinancialOptions.pdf. at p 14.

copy of which is attached and incorporated by this reference) in that they fail to address impacts).

The areas in Urban Holding subject to these reviews are in Urban Holding due to lack of infrastructure available for development of the underlying zoning. The current overlay covers a large swath of area surrounding the 179th Street/I5 interchange. See PPTs dated June 12, 2019. https://www.clark.wa.gov/sites/default/files/dept/files/council-meetings/2019/2019_Q2/061219WS_179St_I5_FinancialOptions.pdf

It appears that this “non-project” action is the County’s effort to do an end around a comprehensive review and instead make a strong effort to remove the current overlay in a piecemeal fashion with no comprehensive plan for the entire area subjected to the Urban Holding Overlay. These documents even designate this “non-project” action as “Phase IV” (The Three Creeks Development that was the subject of the SEPA comments dated August 14, 2018 was designated as Phase I). Therefore, it is clear that the County anticipates specific growth, and specific cumulative actions and impacts, that are inevitably going to occur as preconditions to the lifting of the Overlay as the lifting will be conditioned upon specific Development Agreements being signed and in effect. See generally https://www.clark.wa.gov/sites/default/files/dept/files/council-meetings/2018/2018_Q4/121818_Hearing_AnnualReviewDockets_179thSt_I5_DA.pdf and https://www.clark.wa.gov/sites/default/files/dept/files/council-meetings/2019/2019_Q3/071619_HoltMillCreekDADRAFT.pdf.

It is also assumed that the County seeks to allow certain developers, pursuant to development agreements that may or may not be subject to public review, the ability to consume any existing capacities that may exist for smaller “cut-out” projects without considering the overlay as a whole. Such a false narrative would selectively allow some development while excluding other developments leading to disparate treatment of landowners in the area and could cause greater expense to landowners who are forced into plans previously approved by the Council pursuant to the piecemeal development agreements.

Second, these “non-project” actions involve a modification of an existing environment designated under the Growth Management Act planning process by a proposal to amend the comprehensive plans and to, at least partially (and maybe totally as the Council’s actions have remained a moving target throughout this process regarding the scope of their desires to remove the Urban Holding and/or the scope of the work and the cost of the work), remove the overlay on this area but does not discuss the development of new transportation plans along with potential new ordinances, rules, and regulations and environmental impacts that will be concomitant to the piecemeal implementation of these development agreements.

Third, according to the checklist, this SEPA (which claims no impacts to the environment) fails to consider the impacts of the the proposed development but states that the action is conditioned on “the execution of a development agreement” that, at this stage, does not exist or has not been put into the public record. Thus, it is clear that there will be impacts and it is impossible for the public to comment on the proposal’s impact on the environment if there is no discussion of the development under the propose and it being done in conjunction with the full infrastructure analysis of the area, including but not limited to:

1. Diversion of the money by the County to these projects when the County has a current Road Fund Deficit of \$158 million dollars (or at least that is the deficit set forth in the 2015 Comprehensive Plan update;
2. Diversion of money from repairing existing infrastructure in the County including but not limited to Bridges that need repair and upgrading. *See* <https://www.clark.wa.gov/sites/default/files/dept/files/public-works/bridges/BridgeReport.pdf> and the 7 bridges listed here <https://www.clark.wa.gov/public-works/restricted-bridges>;

In addition, the Document itself does not discuss in any fashion the following:

The lack of substantial public benefit to use of public funds for market rate residential construction and that residential is a net tax loser, which costs \$1.16 in services per tax dollar received. *See* Columbian 5/26/19. In addition, any of the beneficiaries of this proposed County spending who are not currently Clark County residents/taxpayers would unjustifiably benefit by the use of public funds without public benefit can be considered an unconstitutional gift under WA and US Constitutions.

Therefore, the SEPA document(s) should consider an alternative that prohibits the use of public funds in order to lift urban holding designation. Assuming *argumento*, that the County wishes to pursue the use of public funds for lifting the urban holding, the public's % share of the costs should be reserved for road capacity for family wage jobs and affordable housing in a Growth Allocation Plan. *See* Growth Allocation Plan used by the City of Vancouver to reserve Mill Plain/192nd Ave road capacity for jobs. If the public pays for 25% of the costs, then 25% of the road capacity should be reserved for jobs and affordable housing. Jobs reservations should be for pure commercial/industrial uses and not for added residential or retain in "Mixed use". “Affordable Housing” should be homes that are priced so that they can be afforded by people making 60% of the County's average income.

Dr. Oliver Orjiako

Page 5

July 5, 2019

Thank you for your consideration of these comments. Please submit them for the record.

Best Regards,

A handwritten signature in blue ink, appearing to read "David T. McDonald", is written over the printed name. The signature is stylized with loops and a horizontal line.

David T. McDonald



DETERMINATION OF NON-SIGNIFICANCE

Description of Proposal: *Amend Comprehensive Plan to remove Urban Holding Overlay near the I-5/179th St. Interchange, CPZ2019-00023 (Hinton), Phase III*

Proponent: *Clark County Community Planning*

Location of proposal, including street address, if any: *3801 NE 174th St., Vancouver, WA 98686*

Lead Agency: *Clark County, Washington*

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. In 2007, the Vancouver Urban Growth Area was expanded to include the properties affected in this proposal. An Environmental Impact Analysis was completed in 2007 that was associated with this urban land. In 2016 a supplemental Environmental Impact Statement was completed in association with the 2016 Comprehensive Plan update. A new environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 14 days from the date below.

Comments must be submitted by: July 5, 2019

Responsible Official: Oliver Orjiako

Position/title: Director

Address: **RE: SEPA Comments**

Clark County Community Planning
1300 Franklin Street; 3rd Floor
P.O. Box 9810
Vancouver, WA 98666-9810

Date: 6-12-19

Signature: Oliver Orjiako

The staff contact person and telephone number for any questions on this review is Matt Hermen, Planner III, (564) 397-4343.

For other formats, contact the Clark County ADA Office at ADA@clark.wa.gov.



DETERMINATION OF NON-SIGNIFICANCE

Description of Proposal: *Amend Comprehensive Plan to remove Urban Holding Overlay near the I-5/179th St. Interchange, CPZ2019-00024 (Wollam), Phase 4*

Proponent: *Clark County Community Planning*

Location of proposal, including street address, if any: *807 NW 179th St., Ridgefield, WA 98642*

Lead Agency: *Clark County, Washington*

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. In 2007, the Vancouver Urban Growth Area was expanded to include the properties affected in this proposal. An Environmental Impact Analysis was completed in 2007 that was associated with this urban land. In 2016 a supplemental Environmental Impact Statement was completed in association with the 2016 Comprehensive Plan update. A new environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

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Clark County Community Planning

1300 Franklin Street; 3rd Floor

P.O. Box 9810

Vancouver, WA 98666-9810

Date: 6-12-19 **Signature:** Oliver Orjiako

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August 14, 2018

Dr. Oliver Orjiako
Director
Clark County Department of Community Planning
Public Services Building
Vancouver, Washington 98660

RE: Determination of Non-Significance Amend Comprehensive Plan to
remove Urban Holding Overlay near the I5/179th Street interchange Phase
I

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It appears that this "non-project" action is the County's initial attempt to remove the current overlay in a piecemeal fashion with no comprehensive plan for the

entire area subjected to the Urban Holding Overlay. It even designates this “non-project” action as “Phase I” and therefore, it is clear that the County anticipates specific growth, and specific cumulative actions, but anticipates them occurring in a piecemeal basis. It is assumed that the County seeks to allow certain developers, pursuant to development agreements that may or may not be subject to public review, the ability to consume any existing capacities that may exist for smaller “cut-out” projects without considering the overlay as a whole, which would selectively allow some development while excluding other developments leading to disparate treatment of landowners in the area and could cause greater expense to landowners who are forced into plans previously approved by the Council pursuant to the piecemeal development agreements.

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However, there has been no comprehensive analysis of traffic impacts or the impacts of the contemplated infrastructure and developments on the existing environment as required by SEPA and, if one has been completed, it has not been adopted by the County and is not incorporated into this SEPA document.

Therefore, this SEPA review for this non-project actions fails in many ways including failing to consider conduct a comprehensive analysis of the reasonably foreseeable impacts, failing to address the cumulative impacts of all of these developments that are being proposed, failing to consider any possible alternatives and failing to outline any potentially successful mitigation measures.

Fourth, the DNS/Checklist lists no other actions that have been taken by the County regarding the Urban Holding in general and this parcel specifically. Presumably, there have been other determinations, and reviews of those determinations by the Growth Management Hearings Board(s). If other decisions, papers, determinations, environmental reviews etc have been completed by the County regarding this parcel specifically, and the overlay in general, then those documents should be made a part of and/or referenced in the environmental review for this proposed Comprehensive Plan amendment. If those do exist, the DNS/Checklist does not, but should, list the other relevant environmental documents/studies/models that have been done regarding the Urban Holding area since it was placed under the Urban Holding overlay. For example, a county's EIS for its comprehensive plan may have information relevant to the Urban Holding Overlay. In addition, there should be other county, Growth Board and/or appellate court references to the Urban Holding Overlay and the reason(s) that it has not been removed over the years.

Fifth, there is no description of any alternatives much less a range of alternative or preferred alternative or any description of if a particular alternative was fully implemented (including full build-out development, redevelopment, changes in land use, density of uses, management practices, etc.), any description of where and how it would direct or encourage demand on or changes within elements of the human or built environment, as well as the likely affects on the natural environment. In addition, the document fails to identify where the change or affect or increased demand might or could constitute a likely adverse impact, or any description of any further or additional adverse impacts that are likely to occur as a result of those changes and affects.

Sixth, this checklist cannot serve as an environmental analysis for later project reviews because it has been created in a way that does not anticipate any such

¹ It is unclear to me at this point if this current SEPA is for one of those proposed developments.

projects where, in contrast, the county definitely is contemplating such projects. The more detailed and complete the environmental analysis is during the “non-project” stage, the less review will be needed during project review and, therefore, any project review can focus on those environmental issues not adequately addressed during the “non-project” stage. The current checklist and DNS fails to provide any analysis that could be utilized later at a proposed project phase and fails to give notice to the citizen of the real potential environmental impacts that will occur once the Urban Holding Overlay is lifted and projects can proceed.

Currently, given the potential development agreements listed above, along with others that may not be in the public realm, there is ample ability for the lead agency to anticipate and analyze the likely environmental impacts of taking this action and the failure to do so creates an inadequate SEPA document (for example a minimum of 2500 peak hour trips if the developers’ numbers are to be believed in the documents that they submitted in the July work session). Failure to conduct a full environmental review at this juncture allows for the removal of the overlay while precluding the public to speak to the removal of the overlay at all. Plus, once this overlay is removed, the question arises as to whether the removal of all the other portions of the overlay must be removed either piecemeal or as a whole through this “non-project” action that has no real environmental review or input from the public.

Although an environmental checklist can act as a first step in an environmental process, including Part D, Supplemental Sheet for “non-project” activities it should not stand in the way of a more comprehensive environmental impact statement, especially in this case given the large areas under the urban holding overlay that are obviously intended to be subject to removal only upon meeting specific prerequisites. Further, there has been no analysis of the traffic impacts on 179th street, 15th Avenue and/or the 179th street intersection by the current proposal(s) by the lead agency. A full environmental review, that includes all known proposed projects, along with the impact of full build-out should the entire overlay be removed, should be conducted prior to the removal of any portion of the overlay.

These comments assert that this “non-project” SEPA proposal review should also 1) consider all existing regulations, 2) set forth the underlying rationale behind the fact that there is an Urban Holding Overlay in existence, 3) the reason for the overlay being placed on the area, 4) remove it from the overlay and 5) the requirements that are required to remove the overlay as well as and 6) any other development under consideration. Plus the environmental review should include an analysis of the potential impacts of the entire area once the overlay is lifted in the larger area surrounding the 179th Street interchange, there will be a plethora of impacts, including but not limited to traffic impacts.

Therefore, this “nonproject” action involves a comprehensive plan amendment, or similar proposal governing future project development, and the probable

Dr. Oliver Orjiako

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August 14, 2018

environmental impacts that would be allowed for the future development need to be considered. The environmental analysis should analyze the likely impacts of the of build-out of all the underlying zones covered by the overlay when determining the efficacy of allowing this one “non-project” to have the overlay removed. In addition, the proposal should be described in terms of alternative means of accomplishing an objective.

Thank you for your consideration of these comments. Please submit them for the record.

Best Regards,

David



COMMISSIONERS
Norm Harker
Denny Kiggins
Neil Kimsey
GENERAL MANAGER
John M. Peterson, P.E.

8000 NE 52 Court Vancouver, WA 98665
Phone (360) 750-5876

PO Box 8979 Vancouver, WA 98668
Fax (360) 750-7570

www.crwwd.com

File: Annexation 03-17
DNS 03-17

Date Published:
June 21, 2019

June 17, 2019

Please find enclosed an environmental Determination of Non-Significance issued pursuant to the State Environmental Policy Act (SEPA) Rules (Chapter 197-11), Washington Administrative Code.

You may comment on this DNS by submitting written comments within Fifteen (15) days of this notice as provided for by WAC 197-11-340.

Please address all correspondence to: Clark Regional Wastewater District
PO Box 8979
Vancouver, WA 98668-8979
Attn: Steve Bacon

DISTRIBUTION LIST

Federal Agencies: US Army Corps of Engineers, Seattle District
US Fish and Wildlife Service
National Marine Fisheries Service
Northwest Power & Conservation Council
Bonneville Power Administration

Native American Interests: Yakima Indian Nation
Cowlitz Indian Tribe
Chinook Indian Tribe

State Agencies: Department of Ecology
Department of Fish and Wildlife
Department of Community Development
Department of Commerce
Department of Health
Department of Natural Resources – SEPA Center
Department of Transportation
Office of Archaeology and Historic Preservation

Regional Agencies: Fort Vancouver Regional Library
Southwest Clean Air Agency
Southwest Washington Regional Transportation Council



Local Agencies: Clark County
Administration
Building
Community Planning
Public Works
Auditor
Public Health
Vancouver/Clark Parks and Recreation
City of Battle Ground
City of Vancouver
Administration
Community Preservation & Development
Public Works

Other Agencies: Clark Public Utilities
CRESA
C-Tran
Battle Ground School District
Fire Protection District 5
Clark County Sheriff

Interest Groups: Building Industry Association of Clark County
Clark County Natural Resources Council
Vancouver Housing Authority
Columbia River Economic Development Council
Vancouver Chamber of Commerce
Fairgrounds Neighborhood Association
Pleasant Highlands Neighborhood Association
North Salmon Creek Neighborhood Association

Interested Parties: David T. McDonald

DETERMINATION OF NONSIGNIFICANCE

Description of proposal:

Annexation of properties into the District boundary. Said properties are located in NE ¼ Section 13 T3N R1E WM; NE & NW ¼ of the SE ¼ Section 13 T3N R1E WM, NE & SE ¼ of the NW ¼ Section 13 T3N R1E WM.

Proponent:

Clark Regional Wastewater District

Location of proposal, including street address, if any.

The proposed annexation includes all properties within the following described areas:

- *The SE ¼ of Section 12 T.3N., R.1E., W.M.,*
- *The NE ¼ of Section 13 T.3N., R.1E., W.M.,*
- *The E ½ of the NW ¼ of Section 13 T.3N., R.1E., W.M.,*
- *The N ½ of the SE ¼ of Section 13 T.3N., R.1E., W.M.,*
- *The N ½ of the NE ¼ of the SW ¼ of Section 13 T.3N., R.1E., W.M.,*
- *19002 NE 50th Ave 181440-000*
- *19100 NE 50th Ave 181449-000*
- *19020 NE 50th Ave 181517-000*

Lead Agency: *Clark Regional Wastewater District*

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. The environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request.

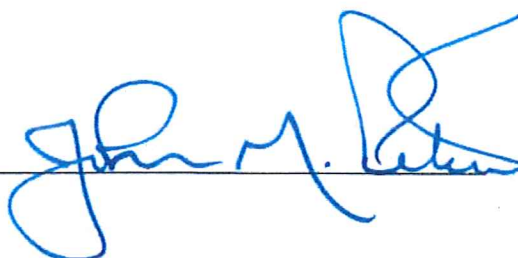
☐ There is no comment period for this DNS.

☒ This DNS is issued under WAC 197-11-340(2); the lead agency will not act on this proposal for 15 days from the date below. Comments must be submitted by July 8, 2019.

Responsible Official: *John Peterson*
Position/Title: *General Manager*
Telephone: *(360) 750-5876*
Fax: *(360) 750-7570*
Address: *8000 NE 52nd Court*
PO Box 8979
Vancouver, WA 98668-8979

Date: 18 JUNE 2019

Signature



ENVIRONMENTAL CHECKLIST

Purpose of Checklist:

The State Environmental Policy Act (SEPA), Chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probably significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

Instructions for Applicants:

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or given the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply". Complete answers to the questions may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Use of Checklist of Non-Project Proposals:

Complete this checklist for non-project proposals, even though questions may be answered "does not apply". IN ADDITION, complete the SUPPLEMENTAL SHEET FOR Non-project ACTIONS (part D).

For non-project actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

A. BACKGROUND

1. Name of Proposed Project, if applicable:

Annexation #03-17, Mill Creek

2. Name of Applicant:

Clark Regional Wastewater District

3. Address and Phone Number of Applicant and Contact Person:

***8000 NE 52nd Court
PO Box 8979
Vancouver, WA 98668-8979
(360) 750-5876
Attn: Steve Bacon, P.E., Development Program Manager***

4. Date Checklist Prepared:

June 14, 2019

5. Agency Requesting Checklist:

Clark Regional Wastewater District

6. Proposed Timing or Schedule (including phasing, if applicable):

The annexation will proceed following the completion of this SEPA process.

7. Do you have any plans for future additions, expansions, or further activity related to or connected with this proposal? If yes, please explain.

This action will allow for future extensions of sanitary sewer service into the area.

8. List any environmental information you know about that has been or will be prepared related to this proposal:

None known.

9. Are other applications pending for governmental approvals affecting the property covered by your proposal? If yes, please explain.

None known.

10. List any government approvals or permits that will be needed for your proposal.

Approval of the proposed annexation by the Board of Commissioners of Clark Regional Wastewater District and the Board of County Councilors.

11. Give a brief, complete description of your proposal, including the proposed uses and size of the project and site. There are several questions addressed later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page (Lead agencies may modify this form to include additional specific information on project description).

This action amends the service boundary of the District to include an additional area of approximately 491 acres within Clark County's urban growth boundary.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including street address, section, township, and range. If this proposal occurs over a wide area, please provide the range or boundaries of the site. Also, a legal description, site plan, vicinity map, and topographic map. You are required to submit any plans required by the agency, but not required to submit duplicate maps or plans submitted with permit applications related to this checklist.

This action proposes to add 82 parcels into the Clark Regional Wastewater District service area. The area is generally described as north of NE 164th Street, east of NE 34th Avenue, west of NE 50th Avenue, and south of NE 192nd Street.

B. ENVIRONMENTAL ELEMENTS

1. EARTH

- A. General description of the site (circle one): flat, rolling, hilly, steep slopes, mountainous, other.

- B. What is the steepest slope on the site and the approximate percentage of the slope?

The steepest slope is 60% primary along the banks of Mill Creek.

- C. What general types of soils are found on the site (e.g., clay, sand, gravel, peat, muck)? Please specify the classification of agricultural soils and note any prime farmland.

The soils are classified as Gee silt loam, with the specific classification of GeB, GeD, GeE, and GeF, and Hillsboro silt loam, with the specific classification of HoA, HoB, HoC.

- D. Are there surface indications or history of unstable soils in the immediate vicinity? If so, please describe.

There are areas of potential instability along Mill Creek.

- E. Describe the purpose, type, and approximate quantities of any filling or proposed grading. Also, indicate the source of fill.

No grading activities are proposed.

- F. Could erosion occur as a result of clearing, construction, or use? If so, please describe.

This non-project action will not propose any activities that could cause erosion.

- G. What percentage of the site will be covered with impervious surfaces after the project construction (e.g., asphalt or buildings)?

No improvements are being proposed.

- H. Proposed measures to reduce or control erosion, or other impacts to the earth include:

No erosion causing activities are proposed.

2. AIR

- A. What types of emissions to the air would result from the proposal (e.g., dust, automobile, odors, industrial wood smoke) during construction and after completion? If yes, describe and give approximate quantities.

No emissions will be associated with this non-project action.

- B. Are there any off-site sources of emissions or odor that may affect your proposal? If so, please describe:

No.

- C. Proposed measures to reduce or control emissions or other impacts to air:

None.

3. WATER

- A. Surface

1. Is there any surface water body on or in the vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names and into which stream or river it flows into.

There are known surface waters within the area. There is a mapped year-round stream, Mill Creek, within the annexation boundary. The area is within the Salmon Creek watershed.

2. Will the project require any work within 200 feet the described waters? If yes, please describe and attach available plans.

No.

3. Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

None.

4. Will the proposal require surface water withdrawals or diversions? Please provide description, purpose, and approximate quantities:

No.

5. Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

There is an area classified as floodway fringe, located along the banks of Mill Creek.

6. Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

No.

B. Ground

1. Will ground water be withdrawn, or will water be discharged to ground water? Please give description, purpose, and approximate quantities.

No.

2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (e.g., domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the size and number of the systems, houses to be served; or, the number of animals or humans the system are expected to serve.

None.

C. Water Runoff (including storm water):

1. Describe the source of runoff (including storm water) and the method of collection and disposal. Include quantities, if known. Describe where water will flow, and if it will flow into other water.

Does not apply.

2. Could waste materials enter ground or surface waters? If so, please describe.

No.

D. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any:

None.

4. PLANTS

A. Check or circle types of vegetation found on the site:

- ☒ Deciduous tree: alder, maple, aspen, other
☒ Evergreen tree: fir, cedar, pine, other
☒ Shrubs
☒ Grass
☒ Pasture
☐ Crop or grain
☐ Wet soil plants: cattail, buttercup, bulrush, skunk cabbage, other
☐ Water plants: water lily, eelgrass, milfoil, other
☐ Other types of vegetation

B. What kind and amount of vegetation will be removed or altered?

None.

C. List any threatened or endangered species known to be on or near the site.

None known.

- D. List proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site:

None.

5. ANIMALS

- A. Circle any birds and animals which have been observed on or near the site:

Birds: hawk, heron, eagle, songbirds, other:

Mammals: deer, bear, elk, beaver, other: coyotes, rabbits, squirrels, and small rodents.

Fish: bass, salmon, trout, herring, shellfish, other:

- B. List any threatened or endangered species known to be on or near the site.

The Washington Department of Fish & Wildlife classifies Coho and Summer Steelhead as threatened, accessible in the area.

- C. Is the site part of a migration route? If so, please explain.

The entire region is part of the Pacific Flyway.

- D. List proposed measures to preserve or enhance wildlife:

None.

6. ENERGY AND NATURAL RESOURCES

- A. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

None.

- B. Would your project affect the potential use of solar energy by adjacent properties? If so, please describe.

No.

- C. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts:

None.

7. ENVIRONMENTAL HEALTH

- A. Are there any environmental hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, please describe.

No.

1. Describe special emergency services that might be required.

None.

2. Proposed measures to reduce or control environmental health hazards, if any?

None.

B. Noise

1. What types of noise exist in the area which may affect your project (e.g., traffic, equipment operation, other)?

None.

2. What types and levels of noise are associated with the project on a short-term or a long-term basis (e.g., traffic, construction, operation, other)? Indicate what hours the noise would come from the site.

None.

3. Proposed measures to reduce or control noise impacts:

None.

8. LAND AND SHORELINE USE

- A. What is the current use of the site and adjacent properties?

The current use of the area is single family residences, agricultural and forest land.

- B. Has the site been used for agriculture? If so, describe.

There are parcels in the area that have been used as farmland.

- C. Describe any structures on the site.

There are residential structures and associated outbuildings on the site.

- D. Will any structures be demolished? If so, please describe.

No.

- E. What is the current zoning classification of the site?

Current zoning in the area includes, R1-7.5, R1-10, R1-20 and MX.

- F. What is the current comprehensive plan designation of the site?

The current comprehensive plan designation of the site is Urban Low Density Residential and Mixed Use.

- G. What is the current shoreline master program designation of the site?

Does not apply.

- H. Has any part of the site been classified as an "environmentally sensitive" area? If so, please specify.

Does not apply.

- I. How many people would reside or work in the completed project?

This non-project action will not change the current number of people who reside or work in the area.

- J. How many people would the completed project displace?

None.

- K. Please list proposed measures to avoid or reduce displacement impacts:

None.

- L. List proposed measures to ensure the proposal is compatible with existing and projected land uses and plans:

The proposed non-project action will allow the current urban zoned properties to obtain sanitary sewer service, as well as allow future developments to extend and connect to sewer as required by County Code.

9. HOUSING

- A. Approximately how many units would be provided? Indicate whether it's high, middle, or low-income housing.

Does not apply.

- B. Approximately how many units, if any, would be eliminated? Indicate whether it's high, middle, or low-income housing.

None.

- C. List proposed measures to reduce or control housing impacts:

Does not apply.

10. AESTHETICS

- A. What is the tallest height of any proposed structure(s), not including antennas? What is proposed as the principal exterior building materials?

None proposed.

- B. What views in the immediate vicinity would be altered or obstructed?

None.

- C. Proposed measures to reduce or control aesthetic impacts:

Does not apply.

11. LIGHT AND GLARE

- A. What type of light or glare will be proposal produce? What time of day would it mainly occur?

None.

- B. Could light or glare from the finished project be a safety hazard or interfere with views?

Does not apply.

- C. What existing off-site sources of light or glare may affect your proposal?

None.

- D. Proposed measures to reduce or control light and glare impacts:

None.

12. RECREATION

- A. What designated and informal recreational opportunities are in the immediate vicinity?

There are public hiking trails located on the Washington State University campus, south of the annexation area at NE 159th Street and NE 50th Avenue.

- B. Would the project displace any existing recreational uses? If so, please describe.

No.

- C. Proposed measures to reduce or control impacts on recreation, including recreational opportunities to be provided by the project or applicant:

None.

13. HISTORIC AND CULTURAL PRESERVATION

- A. Are there any places or objects listed on or near the site which are listed or proposed for national, state, or local preservation registers? If so, please describe.

None known.

- B. Please describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site.

None.

- C. Proposed measures to reduce or control impacts:

None.

14. TRANSPORTATION

- A. Identify public streets and highways serving the site and describe proposed access to the existing street system. Show on site plans, if any.

The area is served by NE 50th Avenue, NE 179th Street, NE 174th Street and NE 40th Avenue. Private roads lie within the annexation area.

- B. Is the site currently served by public transit? If not, what is the approximate distance to the nearest transit stop?

No, the nearest transit stop is located approximately 3 miles west, at NE 29th Avenue and WSU, C-Tran #19 Salmon Creek from 99th Street Transit Center to WSU.

- C. How many parking spaces would the completed project have? How many would the project eliminate?

Does not apply.

- D. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, please describe and indicate whether it's public or private.

No.

- E. Will the project use water, rail, or air transportation? If so, please describe.

No.

- F. How many vehicular trips per day would be generated by the completed project? Indicate when peak traffic volumes would occur.

None.

- G. Proposed measures to reduce or control transportation impacts:

None.

15. PUBLIC SERVICES

- A. Would the project result in an increased need for public services (e.g., fire protection, police protection, health care, schools, other)? If so, please describe.

No.

- B. Proposed measures to reduce or control direct impacts on public services.

None.

16. UTILITIES

- A. Circle the utilities currently available at the site: Electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other.

- B. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on or near the site.

None.

17. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature



Steve Bacon, P.E., Development Program Manager
Clark Regional Wastewater District

Date Submitted: 06/17/19

D. SEPA SUPPLEMENTAL SHEET FOR NON-PROJECT ACTIONS

INSTRUCTIONS:

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment. When answering these questions, be aware of the extent of the proposal and the types of activities likely to result from this proposal. Please respond briefly and in general terms.

1. How would the proposal increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The proposal would not increase these elements.

Proposed measures to avoid or reduce such increases are:

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

The proposal would not affect plants, animals, fish, or marine life.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

3. How would the proposal be likely to deplete energy or natural resources?

The proposal would not deplete energy or natural resources.

Proposed measures to protect or conserve energy and natural resources are:

4. How would the proposal use or affect environmentally sensitive areas or those designated (or eligible or under study) for governmental protection such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The proposal would not affect environmentally sensitive areas.

Proposed measures to protect such resources or to avoid or reduce impacts are:

5. How would the proposal be likely to affect land and shoreline use? Will it allow or encourage land or shoreline uses incompatible with existing plans?

The proposal would not affect land and shoreline use.

Proposed measures to avoid or reduce shoreline and land use impacts are:

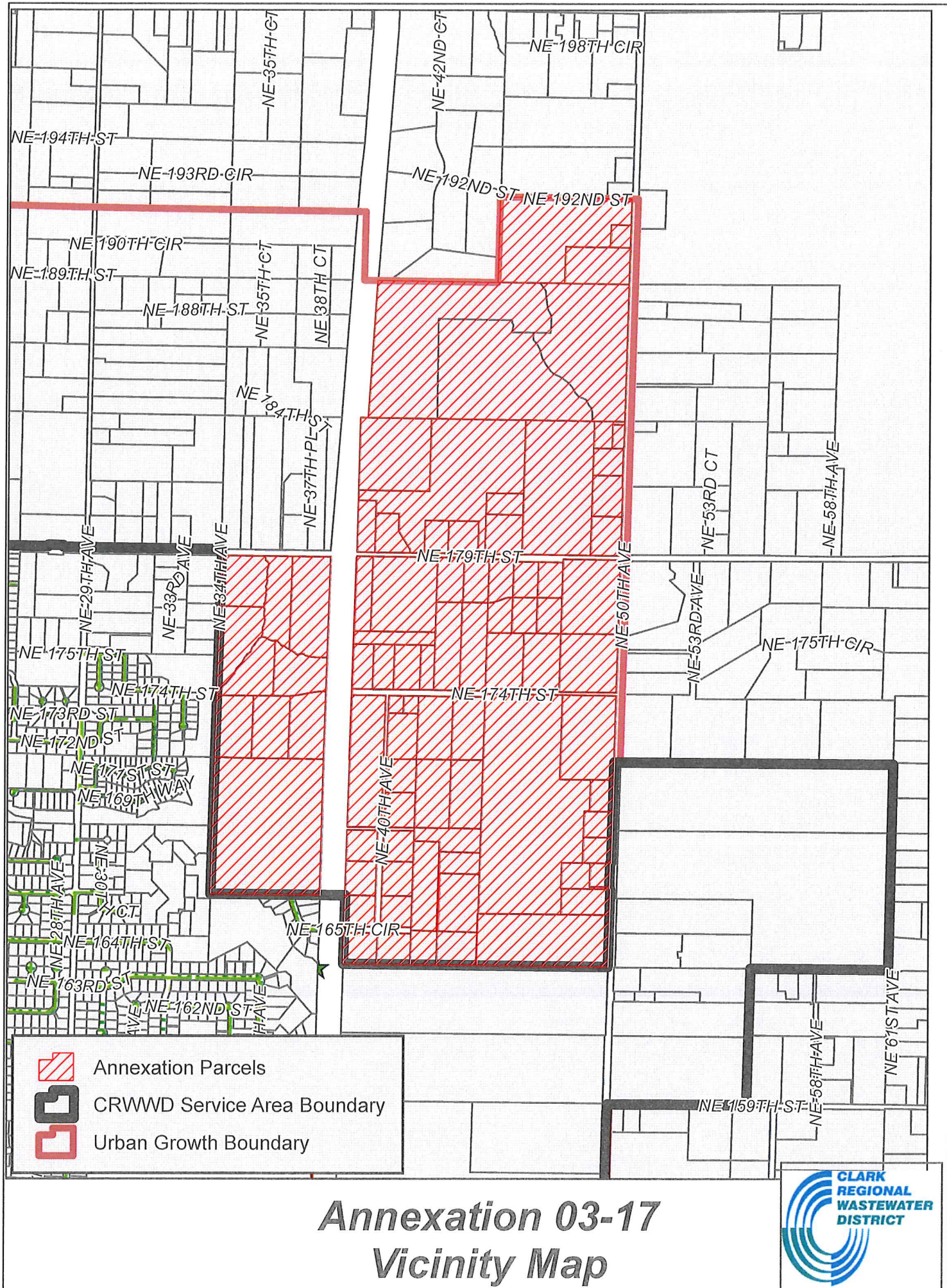
6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The proposal would not increase demands on transportation or public services and utilities.

Proposed measures to reduce or respond to such demand(s) are:

7. Identify whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

The proposal would not cause conflict with local, state, or federal laws or requirements for the protection of the environment.



Annexation Parcels
CRWWD Service Area Boundary
Urban Growth Boundary

Annexation 03-17 Vicinity Map





RIDGEFIELD
SCHOOL DISTRICT
unlimited possibilities

SUPERINTENDENT
DR NATHAN MCCANN

BOARD OF DIRECTORS
DISTRICT 1 EMILY ENQUIST
DISTRICT 2 JOSEPH VANCE
DISTRICT 3 BRETT JONES
DISTRICT 4 BECKY GREENWALD
DISTRICT 5 SCOTT GULLICKSON

Oliver Orjiako, Director
SEPA Comments
Clark County Community Planning
1300 Franklin Street, 3rd Floor
PO Box 9810
Vancouver, WA 98666-9810

RE: DNS for CPZ2019-00023-Amendment to Comp Plan to remove Urban Holding (Hinton) Phase III

Dear Mr. Orjiako:

The Ridgefield School District received the Determination of Non Significance (DNS) that was issued in the above referenced matter and appreciates the opportunity to submit the following comments.

Removing Urban Holding from the 32.45 acres of property that is the subject of the DNS will open the way for development of approximately 129 single family homes. The SEPA Checklist that was included with the DNS describes the County's plans to enter into a development agreement "that funds critical infrastructure," presumably to serve the anticipated development. Public schools are part of the infrastructure that is needed. Contrary to the answer "none" to question 15a regarding increased needs for public services, allowing residential development will increase the need for public schools.

The Ridgefield School District will provide public education to the students residing in the homes that will be built if Urban Holding is removed. If recent housing demographics continue, approximately 38 students will reside in the 129 homes. The District does not have unused capacity in existing schools. To serve the 38 students from this development, and students from other pending and planned developments, the District needs to build a new elementary, middle and high school.

The costs to build new schools is significant. The District's 2015 Capital Facility Plan, which the County has adopted, forecast the cost to build needed schools at over \$90,000,000. Construction costs have increased since then. A bond, state construction assistance, and school impact fees are all needed to pay the costs to build the needed schools. The District calculated school impact fees using the County and City formula is \$11,289.80 for single family homes.

If a bond is not approved, and school impact fees are not assessed in the full amount, removing Urban Holding will have a significant adverse impact on schools. That impact can be mitigated by imposing a requirement that future development pay the District's \$11,289.80 school impact fee.

The District respectfully requests that any actions the County takes that will open the way for new development include a requirement that the developers pay the full \$11,289.80 school impact fee. Thank you for considering these comments and sharing them with the County Council as they deliberate and decide whether to remove Urban Holding.

Sincerely,

Dr. Nathan McCann
Superintendent