

Memorandum

To: City of Vancouver

From: WSP USA

Subject: State Environmental Policy Act Environmental Impact Statement Scoping Comment Summary and Final Scoping Determination

Date: December 5, 2024

The purpose of this memorandum is to summarize comments received during the State Environmental Policy Act (SEPA) scoping period for the **OUR VANCOUVER** Comprehensive Plan Update Draft Environmental Impact Statement (EIS), and to recommend next steps for the Draft EIS analysis.

Based on the comments received, the range of environmental elements identified in the scoping notice remains appropriate, and the Draft EIS analysis should proceed without modifications to its scope.

Scoping Comment Period Overview

The City of Vancouver (City) issued a SEPA Determination of Significance and request for comments on the scope of the EIS on July 12, 2024. The City published this notice in the SEPA Register, *The Columbian*, and the Be Heard Vancouver website for the Comprehensive Plan Update. The City also provided the notice via an email distribution list consisting of federal, state, and local agencies; tribes; local business organizations; local builders and real estate development professionals; neighborhood associations; environmental organizations; media outlets; and other interested parties. The scoping notice was also distributed to the **OUR VANCOUVER** project listserv that includes more than 200 individual contacts.

The scoping notice initially requested comments during an expanded 30-day period, which is greater than the 21-day minimum required by SEPA. The comment period was originally scheduled to end on August 12, 2024. In order to provide additional opportunities for review and comment by local agencies and communities, the City extended the scoping comment period to August 23, 2024, and again to September 6, 2024. The scoping notice requested comments via postal mail or email.

The City issued a revised scoping notice on October 22, 2024, to clarify proposed future growth levels, the number of alternatives that will be analyzed in the Draft EIS, and the role of desired community outcomes and goals in the Comprehensive Plan update and SEPA process. This scoping notice, which was distributed via the same methods as the previous notices, invited additional comments via postal mail or email during a 30-day period ending November 21, 2024. The notice stated that comments submitted during the previous comment period remain valid and will be considered as part of the SEPA review process.

EIS Scope Elements

The original scoping notice identified the City's intent to evaluate a No Action Alternative, as required by SEPA, and up to three other alternatives that outline different land use and growth scenarios in specific areas of the City. The revised scoping notice reduced the number of anticipated action alternatives from three to two.

The scoping notice also identified the following elements of the built and natural environment for discussion in the EIS in accordance with Washington Administrative Code (WAC) 197-11-444:

- Land and shoreline use
- Housing
- Aesthetics (including light and glare)
- Historic and cultural resources
- Transportation
- Noise
- Public services and utilities (including emergency services, water, sewer, schools, parks and recreation)
- Earth (geologic hazard areas, soils, topography)
- Air quality, greenhouse gases, and climate
- Water resources
- Plants and animals

Summary of Comments Received

The City received eight total comment submissions via email and no comments via postal mail during the two comment periods. Seven of the comment submissions came from private individuals, and one of the comment submissions came from the Washington Department of Fish and Wildlife.

None of the comments included objections to the environmental elements identified in the scoping notice. Most of the comments provided detailed input or questions about specific

topics of interest, including EIS elements to be studied, analysis methods, and potential mitigation measures. The following list summarizes the main themes of the comments received by topic area.

EIS Methodology

- Interest in how EIS elements will be prioritized and assessed given potential for conflicts between elements.

Land and Shoreline Use

- Maintain low zoning densities around high-value habitat areas to minimize habitat fragmentation and wildlife displacement.
- Limit development within the Vancouver Lake area to preserve habitats.
- Integrate green spaces into urban areas to benefit residents and provide habitat for wildlife.
- Evaluate how expected development will affect the percentage of forest cover and the effective impervious area within Vancouver's watersheds.
- Incorporate open space into high density areas, such as exploring green roofs or shared open space opportunities, particularly for access by low-income households.
- Assess the efficacy of transit-oriented development.

Housing

- Prioritize urban density and housing affordability.
- Consider “single-room occupancy” as an affordable housing strategy.
- Include utility costs over a 15-year horizon when evaluating housing affordability.

Aesthetics, Noise

- Examine strategies to reduce light and noise pollution in developed areas, particularly at night.

Transportation

- Increase interconnectedness of walkways and trails for alternative transportation.

Public Services and Utilities

- Unbundle elements within public services and utilities to discretely discuss individual topics and emphasize their importance (e.g., emergency services, including fire and police services; utilities, including water and sewer services; schools; parks and recreation; and other public services).

- Ensure that emergency services analysis includes discussion of fire and law enforcement services.
- Amend pipeline company franchise agreements to require an end-of-life plan for the pipes, require monitoring and reporting of leaks, and increase charges for easements.
- Require gasoline fueling stations to prevent and be responsible for addressing tank leaks and to carry higher insurance policy values.
- Evaluate rapid build-out of solar energy installations as an alternative to Clark Public Utilities.

Air Quality, Greenhouse Gases, and Climate

- Investigate how Vancouver can meet its future energy needs while minimizing reliance on fossil fuels.
- Require new buildings to be constructed as solar ready and electric ready.
- Require solar and electric power in development agreements.
- Publicize emissions from Clark Public Utilities' operations and look for ways to reduce their emissions.
- Evaluate carbon offsets purchased by the City and the Port of Vancouver.
- Prioritize cooling and disaster centers.

Water

- Evaluate the impact of stormwater facilities in or near critical areas and potential risk of impact to aquatic environments.
- Implement green stormwater infrastructure to reduce runoff and filter pollutants.
- Avoid new impervious surfaces for roads and trails.
- Assess the potential effects on watershed health, including impacts on hydrology, water quality, and fish habitat conditions.

Plants and Animals

- Work toward 28% tree canopy identified in 2011 Comprehensive Plan, particularly in lower income areas of the city.
- Explore opportunities to incorporate native plants and establish pollinator habitats within urban landscaping.
- Require new developments to limit tree removal and work around existing trees.
- Consider wildlife overpasses or underpasses to enhance connectivity between habitats.
- Use Priority Habitats and Species list definitions as the basis for evaluating impacts to fish and wildlife.
- Assess the impact of new roads on habitat connectivity.

- Conserve national resource lands through a transfer of development rights (TDR) program, or other strategy that provides financial incentives for protecting land from development.
- Group relatively undeveloped parcels and farm and forestland to increase habitat value.
- Identify open space areas where large, connected patches of native vegetation can be preserved to maintain biodiversity and provide corridors for wildlife movement.
- Support educational programs and resources for landowners to implement wildlife-friendly practices.
- Prioritize the mitigation sequence of impact avoidance, minimization, and mitigation.
- Identify and prioritize degraded or fragmented critical areas for implementing restoration projects.
- Implement climate-resilient land use strategies, such as preserving wetlands and riparian zones, to help mitigate the effects of extreme weather events and support species adaptation.

Final Scoping Determination

Based on the comments received during the scoping periods, the elements identified in the scoping notice remain valid for analysis in the Draft EIS, and no modifications are needed before proceeding with the analysis.

All of the high-level themes discussed by commenters will be addressed as part of the EIS analysis, including the evaluation of impacts and benefits to housing density and affordability, light and noise pollution, emissions, climate resiliency, tree canopy coverage, green spaces, stormwater runoff, and fish and wildlife habitat areas.

Some comments requested a level of specificity that is outside the scope of the EIS analysis. The City will consider these comments as appropriate in the broader context of developing the draft Comprehensive Plan and associated code amendments.