

**O'Donnell, Mary Beth**

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**From:** Karen Wood <kwood@pacifier.com>  
**Sent:** Monday, November 17, 2014 6:18 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** EIS Alternatives Comments

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CP16 # 0457

These comments are related to material presented at open houses in October 2014.

I prefer alternative 1 – no action. The land added in the 2007 Comprehensive Growth Management Plan Update will not be used sufficiently by 2035 for residential, industrial, and commercial development to warrant adding any more land to the Urban Growth Areas in the current update. In fact, current projections for 2035 are lower than the projections for 2024 that were used in the 2007 Update, meaning less land is needed in this update, not more. Other changes being proposed in Alternative 2 and 3 seem unnecessary or counterproductive to the goal of preserving resource lands and preventing development outside of Urban Growth Areas.

I am concerned about the proposed reduction to minimum parcel size for agriculture, forest, and rural land in Alternative 2. At the 10/29/14 open house, I asked why this change is being made and was told it is because there is not much land that is over 10 acres for agriculture, over 20 acres for forest, and over 10 acres for rural. That seems like a weak reason for reducing the minimum size of parcels. If in fact there is so little land that will be impacted, then why make the change? Why not preserve what is left of the larger parcels? Information needs to be included in the Draft Supplemental EIS on how much land would be impacted by the proposed changes (acreage and percentages) and why the changes are needed. Both positive and negative impacts on land owners need to be identified, such as increased property tax if zoning is changed to allow more development. Resource and rural lands serve many purposes for fish and wildlife, water quality, aquifer recharge, open space, etc. and need to be preserved and I am concerned about the impact on these uses of the proposed changes. Allowing more subdivision of agriculture, forest, and rural land will result in fragmentation of existing parcels, reducing their value as resource lands. The remaining agriculture, forest, and rural land in Clark County needs to be preserved and large parcels should be kept intact. Instead of encouraging development, Clark County should be implementing policies that encourage agricultural and other resource uses on the remaining land outside the Urban Growth Areas. Without any other information, at this point I am assuming the reason for the change is to encourage more development outside of the Urban Growth Areas, which I believe is counter to the requirements of the Growth Management Act as it will result in development where it shouldn't occur. I am also wondering why urban reserve needs to be removed from the land north of Salmon Creek at this time, allowing development to occur in that area before development occurs in other areas that aren't urban reserve.

I am also concerned about the changes in Alternative 3, allowing development on land that is currently rural for Battle Ground and agricultural for La Center. I am sure there is land elsewhere that can be used for jobs that is already in the county's Urban Growth Areas, resulting in no need for these expansions. The Draft Supplemental EIS needs to explain why this land needs to be added to the Urban Growth Area when there are large areas of land added in the 2007 Comprehensive Plan Update that are available for job growth. I believe the land by La Center was removed from the Urban Growth Area in the last update because it is prime agricultural land and should not be used for commercial development.

As a 50-year resident of Clark County, I care deeply about the quality of life and would like to see it maintained. Thank you for the opportunity to comment.

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