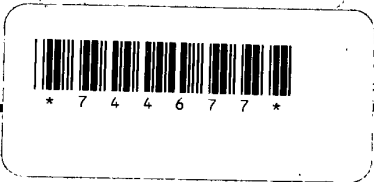


Schroader, Kathy



From: Orjiako, Oliver
Sent: Wednesday, September 16, 2015 10:26 AM
To: Snodgrass, Bryan; Cnty 2016 Comp Plan; Wisner, Sonja; Euler, Gordon; Schroader, Kathy
Subject: RE: Vancouver DSEIS comments for 9/17 PC deliberations

Hello Bryan:

This is to acknowledge receipt of the City of Vancouver comments on the DSEIS. Staff will provide to both the PC and BOCC and will include in our index record. Thank you.

Best,

Oliver

From: Snodgrass, Bryan
Sent: Wednesday, September 16, 2015 10:20 AM
To: Cnty 2016 Comp Plan; Orjiako, Oliver; Wisner, Sonja; Euler, Gordon; Schroader, Kathy
Subject: Vancouver DSEIS comments for 9/17 PC deliberations

Oliver

Attached are the City of Vancouver comments on the DSEIS for the Comprehensive Plan update. If you could forward them to the Planning Commission today for the deliberations on the 17th we would very much appreciate it. As always let us know if there are questions. Thank you. BRS

Bryan Snodgrass | Principal Planner



CITY OF VANCOUVER, WASHINGTON
Community and Economic Development Department
415 W 6th Street • Vancouver, WA 98660

P: (360) 487-7946 | TTY: (360) 487-8602 |
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Schroader, Kathy

From: Snodgrass, Bryan
Sent: Wednesday, September 16, 2015 10:20 AM
To: Cnty 2016 Comp Plan; Orjiako, Oliver; Wisser, Sonja; Euler, Gordon; Schroader, Kathy
Subject: Vancouver DSEIS comments for 9/17 PC deliberations
Attachments: Vancouver DSEIS comments 9 15 15.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Oliver

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September 15, 2015

Chair David Madore and Clark County Councilors
Chair Steve Morasch and Clark County Planning Commissioners
1300 Franklin St., Vancouver WA 98660

**SUBJECT: City of Vancouver Comments on the Clark County Comprehensive Plan Update
Draft Supplemental Environmental Impact Statement (DSEIS)**

Dear Honorable Councilors and Planning Commissioners:

Thank you for the opportunity to comment on the DSEIS. Based on city staff's review of the proposed alternatives and DSEIS, and for the reasons detailed in this letter, the City of Vancouver supports Alternative 3 as the preferred alternative, and recommends that Alternatives 2 and 4 be eliminated from further consideration in this update process.

Regarding the urban and regional issues required to be completed by June 2016, we support the direction set by the County. Increasing the ratio of jobs-to-housing, and keeping cities whole by not forcing unrequested UGA changes are sound policy objectives. The population and jobs forecasts adopted are consistent with these objectives, and provide ample opportunity for growth. The selected jobs forecast is the highest available option provided by the Washington Employment Security Department, and the population forecast increased this spring by the County now provides for 15,000 more persons than the Washington Office of Financial Management's most-likely-to-occur prediction. Just as important, the total amount of land provided to accommodate these forecasts will be more than adequate because of several safeguards included in the development assumptions the County also adopted this spring. These views are not Vancouver's alone, but were testified to by all of the cities in joint letters dated April 8, 2015 and November 26, 2014. Regarding the DSEIS, Vancouver is proposing no changes to the Vancouver UGA in this update cycle, but supports Alternative 3 and the limited expansions proposed by some of the other cities.

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For rural issues, which are not required to be completed by June 2016, the City of Vancouver generally supports allowing a range of rural activities consistent with rural values. The County has pursued these issues through many initiatives outside of this Comprehensive Plan update process recently, such as proposing a 600-acre Rural Industrial Land Bank, allowing more uses in Rural Centers, considering changes to rural home occupations standards, and other initiatives.

However, we cannot support the sweeping rural upzones now proposed in Alternatives 2 and 4, which would have countywide impacts that the DSEIS finds are unprecedented:

- Alternatives 2 and 4 would increase zoning densities on over 50 and 100 square miles respectively (DSEIS p3-14), the largest upzones in terms of area ever considered in Clark County under the Growth Management Act. Alternative 4 would fundamentally change conditions by allowing at least 12,400 new residential lots in the rural area, almost twice what is currently allowed. Alternative 2 would allow 1,900 new lots in the agricultural zone, twice what is currently allowed. (p1-3). We believe These lots may develop more quickly than anticipated, as upzoned property owners may want to lock-in new opportunities before they are removed by a future court or Board, and will have a financial incentive to develop to offset increased property taxes on their higher valued lands.
- Alternatives 2 and 4 would both require significant transportation improvements throughout the county in order to support the additional residential development (p7-9,7-11). Infrastructure costs for both urban and rural areas "could be prohibitive" (p7-11). In 25 years of GMA planning and three previous major Clark County plan updates, Vancouver staff have never seen or heard of such dire findings in an EIS, urban or rural. Vancouver is concerned not only about facilities that would be needed within city limits, but also how new facilities needed in the rural area would compete with City (and urban Clark County) infrastructure projects for limited state and federal assistance.
- There would be negative impacts to rural citizens, not just governments. The DSEIS finds that Alternatives 2 and 4 would increase risk of groundwater contamination and reduction of water supply (p3-14), and both "would change the character of rural Clark County." (p8-9, 8-10)
- The DSEIS is also unprecedented in the lack of information provided in regard to the size and location of these and other impacts. EIS's for previous County Plan Updates

included detailed maps and tables indicating how traffic would change under various alternatives, which roads would become congested, what new facilities would be needed, and the approximate costs (2006 DEIS p 202, 215, 219). Similar listings of needed facilities and costs were also included in 2006 for schools and other services (2006 DEIS p230), none of this essential information is in the current DSEIS, making it extremely difficult to provide detailed comments or make decisions from an informed perspective.

- The lack of detailed information also leaves the DSEIS in violation of its own July 2014 scoping notice and several SEPA requirements, including the requirement for EIS's to include information on "cost and effect on public services " for significant impacts (WAC 197-11-440(6)(e)). EIS's for non-project actions such as Comprehensive Plan changes can be flexible, but must still discuss impacts at a level of detail appropriate to the scope of the proposal. (WAC 197-11-442 (1) and (2)). In evaluating the largest upzone proposals in Clark County history under GMA, this DSEIS fails to include basic information on the size and location of critical impacts that is routinely generated for other proposals, and should have been provided in this case.
- These and other flaws cannot be corrected at the Final EIS stage, since this lack of information on impacts has prevented cities, school districts, citizens, property owners or anyone concerned with impacts to a specific region or site from providing informed comments on Alternatives 2 or 4. The County Planning Commission recently requested an explanation of whether these alternatives would comply with the law if adopted. A similar explanation should be provided about the legal adequacy of the DSEIS to support moving forward with these alternatives.

The next stage of the EIS review process, selection of a Preferred Alternative, is by definition a narrowing of policy choices. The County DSEIS has found that Alternatives 2 and 4 involve changes of historical magnitude with potentially prohibitive costs and other impacts that will be experienced countywide. There is no legal or practical reason to continue to attempt to include widespread rural upzones in a process that was designed to meet Growth Management Act requirements to update regional forecasts and UGA reviews. The GMA does not require including precise rural growth estimates in countywide forecasts and, if the County chooses to do so, any adjustments needed to the countywide forecast based on rural changes could be made in any future year.

Removing the rural upzones from this Comprehensive Plan update process would allow Clark County to meet the required June 2016 completion deadline, thereby avoiding potential sanctions or grant ineligibility. It also allows the County and Cities to avoid the consequences of legal challenges to either the adopted plan or the EIS analysis, both of which are extremely vulnerable if the rezones are included. A successful legal challenge would at best result in the cities and county having to invest time and resources to take up the Comprehensive Plan update process again. At worst it could result in the invalidation of local plans.

If the County wishes to pursue the upzones within a separate process, it may do so with the time and focus needed to provide necessary information and analysis for sound and legally defensible community input and decision making. We do not believe anyone – the County, cities, rural zone change supporters, or opponents – is served by the current process.

Again, I thank you for the opportunity to comment and for considering input on behalf of the City of Vancouver.

Sincerely,



Chad Eiken, AICP, Director

City of Vancouver Community and Economic Development Department
(360) 487-7882