

**Schroader, Kathy**



**From:** Mike Bomar <MBomar@credc.org>  
**Sent:** Thursday, September 17, 2015 2:10 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** CREDC DEIS Comments  
**Attachments:** CREDCDEISCommentsDraft.pdf; ATT00001.htm

See the attached comments from the Columbia River Economic Development Council.

Please call me if you have any questions or concerns. 360-909-3766.

**Mike Bomar**

*President*

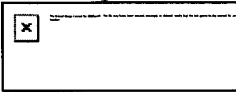
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*Accelerating Business Growth and Innovation*



Wednesday, September 16, 2015

Community Planning  
EIS Comments  
P.O. Box 9810  
Vancouver, WA 98666

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for the 2016 Comprehensive Growth Management Plan Update. The Columbia River Economic Development Council (CREDC) is a Public/Private partnership working to accelerate business growth and innovation in Clark County, Washington. One of our responsibilities, as outlined in the comprehensive Clark County Economic Development Plan, is to support investment in the infrastructure and planning needed to attract new businesses and talent to this area. With that in mind, our Lands for Jobs Committee respectfully submits the following comments in no particular order:

1. **Growth Plan Assumptions:** The CREDC supports a strong jobs to household ratio projection and appreciates the County Council's interest in promoting planning for more jobs. We have concerns that the population assumption does not reflect the historical (from 1960 to 2010 Clark County averaged an annual growth rate of 3.07%) or likely growth anticipated, which will negatively impact the projection for available land for jobs. We appreciate and support a market factor of at least 15 percent for commercial, business park, and industrial land capacity.
2. **Table 1.1 Summary of Planning Assumptions:** The 2016 Update plans for a significant reduction in the amount of jobs (from 138,312 to 101,153) over the next 20 years. Current and historical activity does not support this type of adjustment.
3. **Alternatives 2 and 4:** The CREDC continues to have concerns on the long term impact that parcelization will have on economic opportunities and availability of viable significant employment sites. We encourage that reconciliation and for rural parcelization to be allowed in a way that protects future employment land opportunities. We also have concerns about the infrastructure investment required to service the additional parcels and the potential to limit the availability of infrastructure investments in key employment areas.
4. **Critical Areas:** The CREDC is concerned that the current vacant lands model doesn't accurately reflect the impacts of critical areas. In particular, the newly implemented Biodiversity area which removes a significant amount of buildable land from the model. The model should be updated prior to plan adoption.



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The CREDC recognizing the importance of planning for an adequate supply of employment lands to meet the needs of our target sector employment growth and to provide for more family-wage job opportunities in our community. We encourage the Council to take the time needed to carefully consider and address the implications of the Comprehensive Plan as it will guide our community for the next 20 years. We appreciate the Council's efforts to partner with private and public entities to promote job growth in a way that is fair, strategic, and sustainable. We look forward to working with you to continue to inform this and future planning efforts.

Sincerely,

Mike Bomar,  
CREDC President