

**Anderson, Colete**



**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 4:08 PM  
**To:** Euler, Gordon; Alvarez, Jose; Anderson, Colete  
**Cc:** Schroader, Kathy  
**Subject:** FW: Public Comment on the Comprehensive Growth Management Plan  
**Attachments:** McIsaac CMP Comment Letter 091715.docx

FYI AND FOR THE RECORD.

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**From:** DONALD MCISAAC [<mailto:donaldmcisaac@msn.com>]  
**Sent:** Thursday, September 17, 2015 4:06 PM  
**To:** Orjiako, Oliver  
**Subject:** FW: Public Comment on the Comprehensive Growth Management Plan

My apologies on the misspelling of your name on the letter.

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**From:** [donaldmcisaac@msn.com](mailto:donaldmcisaac@msn.com)  
**To:** [comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)  
**CC:** [david.madore@clark.wa.gov](mailto:david.madore@clark.wa.gov); [tom.mielky@clark.wa.gov](mailto:tom.mielky@clark.wa.gov); [jeannie.stewart@clark.wa.gov](mailto:jeannie.stewart@clark.wa.gov)  
**Subject:** Public Comment on the Comprehensive Growth Management Plan  
**Date:** Thu, 17 Sep 2015 15:54:47 -0700

Please see the attached letter providing a recommendation for Alternative 4 as the preferred alternative and comment on the draft SEIS document.

Thank You,

Donald McIsaac

**Anderson, Colete**

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**From:** DONALD MCISAAC <donaIdmcisaac@msn.com>  
**Sent:** Thursday, September 17, 2015 3:55 PM  
**To:** Cnty 2016 Comp Plan  
**Cc:** Madore, David; tom.mielky@clark.wa.gov; jeannie.stewart@clark.wa.gov  
**Subject:** Public Comment on the Comprehensive Growth Management Plan  
**Attachments:** McIsaac CMP Comment Letter 091715.docx

Please see the attached letter providing a recommendation for Alternative 4 as the preferred alternative and comment on the draft SEIS document.

Thank You,

Donald McIsaac

September 17, 2015

Mr. David Madore, Chairman of Clark County Board of Councilors  
Mr. Tom Mielky, Clark County Councilor  
Ms. Jeannie Stewart, Clark County Councilor  
1300 Franklin Street  
Vancouver, Washington 98680

RE: Comment on the Clark County 2016 Comprehensive Growth Management Plan Update and associated August 15, 2015 Draft Supplemental Environmental Impact Statement (SEIS)

Dear Councilors,

Please consider these comments on 1) the preferred alternative you are scheduled to select on October 20, 15 to update Clark County's Growth Management Plan, and 2) the draft Supplemental Environmental Impact Statement analytical document.

Recommendation for a Preferred Alternative

We recommend a properly adjusted Alternative 4 as your most reasonable choice for a preferred alternative. I won't repeat here the verbal testimony in support of this recommendation made by myself on September 3, 2015 and my son Adam Mclsaac on September 10, 2015 on behalf of our extended family and various neighbors; I understand this is part of the electronic record and you are able to review it at your convenience. However, some key justifications for this recommendation include the following:

- There have been no growth management policy changes for rural areas in the past 20 years since the 1994 Comprehensive Management Plan, including the 2007 update process. Adopting Alternative 1 would be a decision for no policy changes for another 20 years. It is not reasonable to freeze rural areas with no policy changes for a period of 40 years.
- Alternative 2 is only slightly different than Alternative 1, and is also not reasonable for rural areas.
- Providing for the limited policy changes in Alternative 4 provides for important social and economic benefits in rural areas, in a manner consistent with goals and objectives in the Growth Management Act.
- Criticisms and concerns about possible negative effects of Alternative 4 you have heard in public testimony about Alternative 4 are inaccurate and exaggerated.

In terms of general area refinements of the Alternative 4 as currently described, there are areas in the Hockinson and La Center rural areas where additional changes to FR-10, AG-5, and R.2.5 should be implemented to achieve better alignment with the predominant lot size of the sub-area in a manner consistent with the local rural character.

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## Comments on the draft SEIS Document

The draft SEIS represents a concedable initial draft of some of the analytical requirements of SEPA, but needs considerable additions and adjustments between this draft stage and a final SEIS to effectively serve as a neutral analysis of the environmental impacts four alternatives in the context of Growth Management Act, other applicable law, public input, and the policy decision making authority of the Board of Councilors. When you review all the comments received during this open comment period and consider how to advance this draft to a final analytical document on October 20, 2015, it is appropriate to task staff with making the necessary adjustments, corrections, and additions to insure that the document adequately supports review by State authorities of the preferred alternative.

We cannot submit an extensive or detailed list of problems and recommended changes to the draft SEIS document, given the short time provided for a private citizen with previously scheduled obligations during the August 15 – September 17, 2015 timeframe. However, some problem areas that need to be addressed include the following:

- Additional Growth Management Act context needs to be added, particularly with regard to its provisions that speak to the consistency of Alternative 4 with Growth Management Act goals and objectives.
- There are various locations in the document where the neutrality of the narrative can be questioned, with a bias towards maintenance of status quo (Alternative 1). This important document needs to be completely balanced with regard to existing or omitted statements that achieve this.
- A thorough review for numerical inconsistencies, such as the number of buildable lots cited early and later in the document, needs to be completed and all errors corrected.
- There appears to be a number of technical corrections needed, such as the count of buildable lots in Alternatives 1, 2 and 3. It appears many lots without buildings on them are counted as buildable, even though they are in unbuildable areas as a result of protective regulation or natural configuration.
- Ranges around the various assumptions, such as those listed in Table S-1, need to be presented, and information on very recent trends since the turn-around of the 2008 economic recession also need to be presented.
- Greater detail needs to be included on the justification basis for Alternative 4.
- Great detail needs to be included in the rationale for the inclusion of the rural changes included in Alternative 2.
- Context of the social and economic benefits of policy changes need to be included, as well as specific analysis.
- Consistency of the alternatives with other Comprehensive Management Plans of other counties in Washington State should be added.

Again, this is not to be viewed as a complete list of areas that should be addressed to make for a more accurate, neutral, and thorough analytical document. We encourage you to task the staff with a full review and attention to at least these areas.

There is a perspective that only natural environmental impacts should be included in SEIS of this nature. While the final SEIS should include descriptions of such effects, as is in the current document, there is no limitation of providing additional analysis useful and appropriate to you in your selection and defense of the preferred alternative. However, if you deem it is inappropriate to include such information as social and economic benefits, analysis of policy consistency with the Growth Management Act within the SEIS document, you should task staff with providing independent White Papers on these important topics.

Thank you for your extensive work on this matter that is so important to rural citizens of Clark County.

Sincerely,



Donald O. McIsaac, Ph. D.

Cc: Mr. Mark McCauley, County Manager  
Dr. Oliver Orijako, Lead Agency Designee  
Mr. Gordy Euler, Project Proponent and Manager