

Schroader, Kathy



From: Wait, Judith Ann <judith.wait@wsu.edu>
Sent: Thursday, September 17, 2015 9:23 AM
To: Schroader, Kathy
Cc: Cnty 2016 Comp Plan; Orjiako, Oliver; Euler, Gordon
Subject: Comments due by Sept. 17 on environmental analysis for growth plan
Attachments: DSEIS comments J.Wait 17sept2015.docx

Please accept the comments attached for the public record and consideration by the Planning Commission and Board of Clark County Councilors.

Respectfully submitted,

Jude Wait

From: Schroader, Kathy <Kathy.Schroader@clark.wa.gov>
Sent: Tuesday, September 15, 2015 1:29 PM
To: Schroader, Kathy
Subject: NEWS RELEASE: Comments due by Sept. 17 on environmental analysis for growth plan

September 14, 2015

Contact: Oliver Orjiako, Community Planning
(360) 397-2280 ext. 4112; Oliver.Orjiako@clark.wa.gov
Gordy Euler, Community Planning
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Comments due by Sept. 17 on environmental analysis for growth plan

Vancouver, WA – Written comments will be accepted until 4 p.m. Thursday, Sept. 17 for the Planning Commission to consider before recommending a “preferred alternative” for the county’s next growth management plan.

The Planning Commission will meet to deliberate at 6:30 that evening on the sixth floor of the Public Service Center, 1300 Franklin St. The public hearing for oral comments ended Sept. 10.

Anyone interested may review and comment on the supplemental draft environmental impact statement released Aug. 5 covering four alternatives. Those alternatives range from little or no change in planning and zoning to substantial changes in rural, agricultural and forestry zoning districts.

The growth plan currently in effect was adopted in 2007. It included a full environmental impact statement that still applies to much of the county. The supplemental statement examines issues not covered in 2007 and now under consideration.

Go to www.clark.wa.gov/planning/2016update/alternatives.html to view the report. Reference copies also are available at local city and town halls and public libraries.

Submit comments:

- Online: www.clark.wa.gov/planning/2016update/comments.html OR <http://www.peakdemocracy.com/2963>
- Email: comp.plan@clark.wa.gov
- In person: Community Planning, Public Service Center, Third Floor, 1300 Franklin St., Vancouver.

Call (360) 397-2280 for more information or visit the county website: www.clark.wa.gov

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This e-mail and related attachments and any response may be subject to public disclosure under state law.

Overall, and in their specifics for parcel size reductions, Alternatives 2 and 4 propose largely unmitigated perturbations to at-risk natural resources and community resilience. Even the adverse impacts of Alternative 1 remain unmitigated, but at least the current, no [more] action Alternative, has been through the courts. The opportunity to actually monitor and assess the impacts since 2007 appears to remain unfulfilled. *Cumulative impacts* have not been adequately addressed if at all, in any of the chapters. Where the term comes up, such as with “adverse impacts that cannot be avoided,” the future looks grim for water quality, water quantity, aquatic resources for fish and wildlife, etc.. Instead, intense development and ecosystem fragmentation due to the already reduced parcel sizes, threaten resources and critical biodiversity such as pollinator habitat. An alternative for the Plan should fully consider the contributions of working landscapes, and the imperative of their maintenance and enhancement, for the multiple potential benefits. The products of sustainable forestry, agriculture, and eco-tourism are in high demand. No more parcel size reduction is justifiable.

Other comments (Slow Food Southwest Washington, Friends of Clark County, Futurewise, and my previously submitted comments and references) are hereby incorporated by reference. References include recommendations of the multi-stakeholder Food System Council, the Agriculture preservation report, and the Healthy Living Report. What evidence is there that any of the previous comments and recommendations have been heeded, let alone incorporated into long-term management plans?

With all due respect, the DSEIS under review is suspect. I stopped lending it credibility when I saw the tables in the Water Resources chapter. What kind of numbers are

9,94518,690 acres

Or

13,11238,897

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However, any way you do the math, it is unconscionable to impact so many acres, especially without reliable mitigations or a track record of much meaningful “project level” measures. Cumulative impacts seem assured, in part because there are few regulations in place, and hardly any incentives for smarter development or biodiversity. How will Clark County meet current water quality permit requirements? The DSEIS even states, for one example: “Most land subject to development review is not governed by design standards that can protect natural and scenic resources, nor are regulations in place to reduce energy consumption.”

In brief, the only alternative to focus on is Alternative 1. Further measures and recommendations should be instituted to mitigate the already extensive impacts of UGA expansion, habitat fragmentation, and parcelization. We need connectivity instead—for infrastructure such as could be provided with Agricultural Production Districts, and for biodiversity elements within and beyond the UGA. We need to protect remaining (and diverse) soils, and enhance mitigations for the impacts to our water supplies. Climate change will only intensify these needs, such as the drought is showing us.