

**Schroader, Kathy**

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**From:** susan rasmussen <sprazz@outlook.com>  
**Sent:** Wednesday, September 16, 2015 9:38 AM  
**To:** Cnty 2016 Comp Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Sent from Windows Mail

## Schroader, Kathy

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**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

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**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 17<sup>th</sup> 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 6<sup>th</sup> Street • Vancouver, WA 98660

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**Schroader, Kathy**

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**From:** Snodgrass, Bryan  
**Sent:** Wednesday, September 16, 2015 10:20 AM  
**To:** Cnty 2016 Comp Plan; Orjiako, Oliver; Wiser, 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

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 17<sup>th</sup> we would very much appreciate it. As always let us know if there are questions. Thank you. BRS

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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.



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,

A handwritten signature in black ink, appearing to read "Chad Eiken", with a horizontal line extending to the right.

Chad Eiken, AICP, Director

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

**Schroader, Kathy**

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**From:** Bremer, LeAnne M. <LeAnne.Bremer@MillerNash.com>  
**Sent:** Tuesday, September 15, 2015 2:47 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** Comment on DSEIS for 2016 Comp Plan Update  
**Attachments:** doc02478820150915134534.pdf

Please enter this comment into the record. Thank you.

**LeAnne M. Bremer, P.C.**  
Partner-in-Charge Vancouver Office

**Miller Nash Graham & Dunn LLP**  
500 Broadway Street | Suite 400 | Vancouver, Washington 98660  
*Direct:* 360.619.7002 | *Office:* 360.699.4771 | *Fax:* 360.694.6413  
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**LeAnne M. Bremer, P.C.**  
leanne.bremer@millernash.com  
360.619.7002 direct line

## Memorandum

**To:** Clark County Long Range Planning Staff  
**From:** LeAnne M. Bremer, P.C.  
**Subject:** Stan Firestone  
Tax Lot #180532-000  
Public Comment on DSEIS  
Support for Alternative 2 or 4  
**Date:** September 15, 2015

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On behalf of Stan Firestone, I am submitting this comment into the public record for the Draft Supplemental Environmental Impact Statement (SEIS) dated August 2015.

Stan Firestone owns Tax Lot #180532-000, which is currently zoned Agriculture-20. The property is forty acres in size, and is largely surrounded by smaller parcels. See attached map. Mr. Firestone has been attempting to put his property to productive agricultural use, but given the surrounding parcelization, he receives many complaints from neighbors about noise and pesticide use. In particular, the Washington State Department of Agriculture has in recent years received five complaints about Mr. Firestone's agricultural use.

Mr. Firestone believes that a Rural-5 designation would be appropriate for his property similar to the property directly to the west and south. It is also the case that in 1998, the Board of Commissioners did designate his property R-5, but due to a mapping error and a subsequent Growth Board case, the zoning reverted to AG-20.

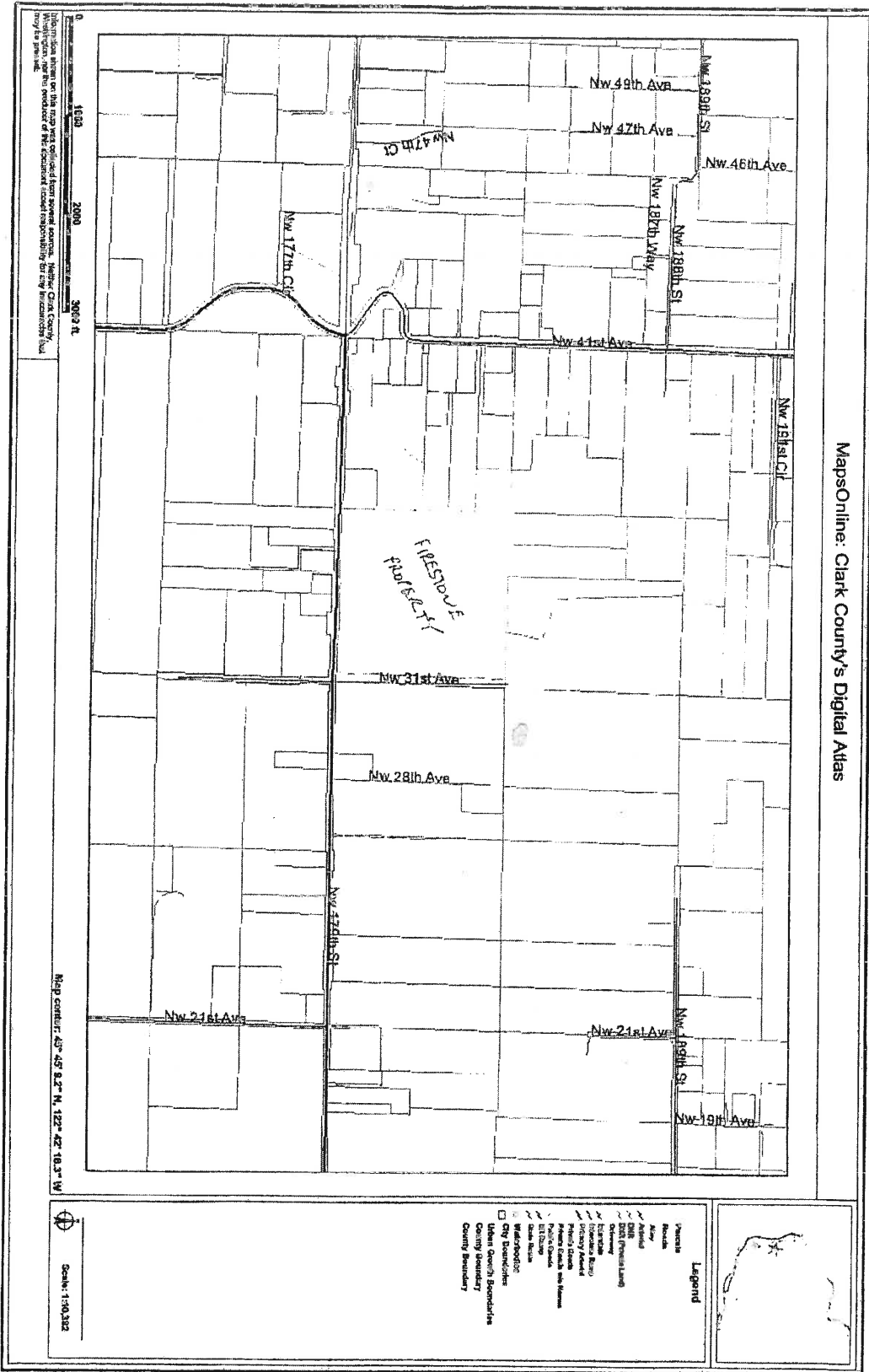
While reserving his rights to advocate for R-5 or similar zoning, since the County is accepting comments on the DSEIS on the alternatives discussed in the DSEIS, Mr. Firestone supports Alternatives 2 and 4, as they apply to his property. Either of these alternatives would designate Mr. Firestone's property as AG-10.

Regarding Alternative 2, Mr. Firestone agrees with the policies behind this statement in the DSEIS:

This alternative incorporates changes in policy direction and land use/zoning, incorporates the Board's principles and values, and acknowledges existing development trends. It is a collection of technical and mapping changes to incorporate studies that have been undertaken over the past seven years, such as the Rural Lands Study and Three Creeks Special Planning area. Page 1-6.

Mr. Firestone also supports the rationale for Alternative 4 as it applies to his property in that it encourages clustering options to preserve resource lands, open space, and non-residential agriculture uses while at the same time providing additional economic opportunities in the rural areas. Page 1-14.

At a minimum, re-designating Mr. Firestone's property to AG-10 will still maintain the resource designation on the property, but provide the property owner with more flexibility and options, allowing for additional owners and potential, productive uses consistent with the revised zoning. Thank you for consideration of this comment.



**Schroader, Kathy**

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Tuesday, September 15, 2015 3:21 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Alternate 1

Comments:

Stop pandering to special interests and start considering the real impact of alternative 4 on county infrastructure and services.

Alternative 1 is consistent with the GMA, including its goals and principles (Chapter 36.70A RCW), according to the latest Growth Management Hearings Board and the latest court decisions.

Alternative 1 is adequate for the 20-year projected growth estimate.

The DSEIS supports choosing Alternative 1 as the preferred option as it states that Alternative 1 will have the least impact on all the elements it considered: earth resources; water resources; fish and wildlife resources; energy and natural resources; land and shoreline use (which includes housing); transportation; and public facilities and utilities.

Alternative 1 is the most friendly to Clark County taxpayers and ratepayers, rural and non-rural, because ratepayers of all wealth levels subsidize the cost growth. Growth does not support itself.

Planned growth, as currently exists is frugal and saves large areas needed for future farms, forests, greenspaces and commercial/industrial and multi-unit housing developments.

Submitted by:  
Randall Pearl

Email: [rpearl@comcast.net](mailto:rpearl@comcast.net)

Address:



**Schroader, Kathy**

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**From:** Gretchen Starke <gstarke@pacifier.com>  
**Sent:** Tuesday, September 15, 2015 3:53 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** comments on the SDEIS for the update of the growth plan  
**Attachments:** growth plan update, written comments, sept 2015.doc

Please accept these comments on the SDEIS for the update of the county growth management plan. Please make sure these are in the record. Thank you.

Gretchen Starke  
Conservation Chair,  
Vancouver Audubon Society

# **VANCOUVER AUDUBON SOCIETY**

P.O. Box 1966 Vancouver, WA 98668-1966  
www.vancouveraudubon.org



September 15, 2015

Community Planning  
Comp Plan Comments  
P.O. Box 9810  
Vancouver WA 98666

## **Subject: Comments on the Update of the County Growth Management Plan and the SDEIS**

**ATTN:** Oliver Orjiako

Dear Mr. Orjiako:

Please accept these comments for the record.

I am the conservation chair of the Vancouver Audubon Society. The Audubon Society works on behalf of birds and other wildlife. Because growth has a profound effect on wildlife and habitat, we have been long concerned about planning in this county. We appreciate the opportunity to comment on the proposed alternatives to the plan and on the SDEIS. The first part of these comments are an expansion of the testimony I made before the joint planning commission and county council hearing on September 10.

The Vancouver Audubon supports Alternative 1 and opposes Alternative 4. There are many reasons to oppose Alternative 4. It promotes sprawl of a kind that is neither strictly urban nor actually rural, but is a kind of bastard combination of the two with the worst qualities of each and with few of the amenities of either. There would be the traffic congestion of urban areas and the distance from public and private services, such as grocery stores, of rural areas. Alternative 4 will cost the taxpayer a bundle of money providing public services to the newcomers. Either that, or the public services for the rest of us will deteriorate as scarce public dollars stretch in an effort to provide services to people spread out all over the county.

Alternative 4 will put a strain on water resources. Alternative 4 will promote more pollution from cars because it will be difficult, if not impossible, to provide C-Tran services to such a scattered population and the new residents will have to use their cars. Alternative 4 will hem in the cities, hampering their orderly growth. Alternative 4 will reduce the ability of the county to attract large employers, those that would need large tracts of land.

I could go on. Alternative 1, on the other hand, does not do those things. Alternative 1 provides for plenty of room to grow, to house the new population, to allow for support facilities such as stores and restaurants, offices and schools, all without putting undue pressure on the taxpayer.

But, Vancouver Audubon's main interest is in birds and wildlife. The SDEIS makes it very clear that, of all the alternatives, Alternative 4 has the greatest impact on fish and wildlife. This is because of the probable more intensive development of 65,500 acres of land, across most of the drainage basins. On the map, you can see the band of land proposed for upzoning going from the south to the north. Forest and field habitat will be converted to houses and lawns, neither of which is suitable for most wildlife. As each parcel is developed (and of course, they will be developed -- otherwise, why are we all going through this exercise?), the wild animals, such as birds, will be displaced to nearby parcels. The problem is that, if the parcel is already occupied by another pair of birds of the same species, the newcomers will be driven out. A pair of birds are territorial -- they defend their nesting area and the resources within. Otherwise, they cannot succeed in raising their chicks. The birds who lose their habitat will not reproduce and they will eventually die. The population of that species will decline and they will be replaced by species that are more comfortable living with human habitation -- species such as starlings and crows, for example. As more and more parcels are developed, less and less habitat will remain.

There is the problem of fragmentation. Breaking habitat up into pieces makes it less suitable for wildlife. Each species has its own requirements. Take as an example, warblers. Most species of warblers nest in forested areas. Warblers are subject to nest parasitism, that is, other birds, such as cowbirds, lay their eggs in the warblers' nest. The cowbird chicks hatch first and are the most aggressive in demanding food from the parents. Often, the cowbird chick will kick the warbler chick out of the nest. But, warblers nest deep in the woods. Cowbirds don't like going deep into the woods. If the woods are broken up by development, the cowbirds can easily reach the warblers' nest. Alternative 4 will break up a lot of woods.

More intensive development adversely affects fish, especially salmon. Salmon require cold, clean water. More intensive development introduces silt and other pollutants into the streams. As streamside vegetation is removed, the water heats up because of the lack of shade. The salmon become more stressed and may not make it to spawning time.

More intensive development resulting from upzoning disrupts migration corridors for both aquatic and terrestrial species. An animal moving along a stream corridor through the woods will suddenly confront an expanse of lawn or a building. Its migration is then disrupted.

But, the SDEIS offers a grain of hope. There is such a thing as mitigation. The county could take measures to mitigate for the harm done to wildlife by Alternative 4. The SDEIS

specifically mentioned the Conservation Futures Program, a program in which the county, through various grants and funding from a number of sources, buys land for recreation, open spaces, and conservation purposes. Indeed, if thoughtfully implemented, Conservation Futures could help offset to some extent, the harmful effects of Alternative 4 on fish and wildlife. Strategic purchases of land or development rights could help maintain migration corridors, could reduce somewhat fragmentation. The problem is, is that mitigation is not required. There is no evidence that the present board of councilors (let alone considering what any future board might do) would even consider an attempt to mitigate the development resulting from Alternative 4, or any of the alternatives. In fact, at least one of the councilors, Councilor Meilke has exhibited evidence that he is hostile to the Conservation Futures Program. Councilor Madore has supported Mielke in this. Just recently, Mielke and Madore voted to start the process of selling land purchased through the program, land that has upland habitat near the Lewis River. Upland habitat is becoming more and more scarce in Clark County.

If the county chooses Alternative 4 as the preferred alternative, and if that choice withstands challenges (no sure thing), and if the board of councilors continues to attack the Conservation Futures Program, fish and wildlife have an uncertain future in Clark County.

I'd also like to point out that there are no mistakes in the current plan concerning lot size. There is a difference between tax lots and legal buildable lots. And neither the federal nor the state constitutions guarantee a return on investment or a right to maximize income on property.

The following are further comments on the SDEIS document itself:

1. While I realize it is a supplemental EIS and relies on the EIS for the current plan and while I understand that time was short, it still is a skimpy document, especially in considering the impact of the various alternatives on fish and wildlife. I would have especially appreciated more detailed analysis of Alternative 4's increasing the fragmentation of habitat and breaking up of migration corridors, especially on species such as warblers. It would also have been useful to have some discussion of what areas of the county would be more impacted, that is, which stream corridors that are presently relatively intact would be fragmented.
2. I did not see that the issue of wildfire was addressed at all. If it was, I missed it when looking through the SDEIS. As the climate changes because of global warming, we can expect summers to be warmer and dryer. As this summer should have told us, wildfire is becoming more and more an issue that we need to pay attention to. One of the adverse consequences of climate change in the Pacific Northwest will be an increase in wildfire (Climate Change, EPA). Because Alternative 4 provides for a greater increase in lots and homes in the wooded areas of the county -- what land managers call the urban-forest interface -- will increase the risk of wildfire. Further, the increased presence of homes, would increase the difficulty -- and danger -- the fire fighters would have in controlling the fire. For this reason alone, Alternative 4 should be rejected.

3. Two of the numbers in the table on page 3-13 make no sense. It appears that the computer adding a couple of columns made a serious mistake. The subtotal for agriculture is given as **9,94518,690 acres** when I think that the number, 18,690, is the number intended and the subtotal for forest is given as **13,11238,897** when I think the number, when I think that **38,897** is the intended number.

Thank you.

Sincerely,

Gretchen Starke  
Conservation Chair,  
Vancouver Audubon Society

## Schroader, Kathy

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**From:** Deborah Nelson <Just-solutions@comcast.net>  
**Sent:** Tuesday, September 15, 2015 4:16 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** Comments for Comprehensive Plan Update

As a member of the Clark County Growth Management Citizens Advisory Committee in the 1980s, I spent considerable time studying and working with citizens from Clark County and cities to help establish a sustainable growth plan for our community.

I would urge you to delay the decision until Spring 2016 in order to bring together stakeholders, citizens, and planners to create an improved Comprehensive Plan Update. However, if you won't extend the deadline, then I support Alternative 1 for the 2016 Growth Management Plan's Comprehensive Plan Update.

Alternative 1 is adequate for the 20-year projected growth estimate. It has the least impact on resources, including water, fish and wildlife, energy, natural resources, land use, housing, transportation, public facilities, utilities as well as monetary resources.

Alternatives 2, 3, and 4 do not adequately address concurrency. Concurrency is critically important so that taxpayers and ratepayers do not unfairly subsidize growth of new housing. Before subdividing lands, we must first plan (and determine who will pay) for increased infrastructure of transportation, water, sewers, utilities, schools, public services, fire and law enforcement.

Alternative 1 more effectively plans for the long-range needs of our community. It saves areas needed for future farms, commercial and industrial lands essential for business growth, forests, and housing.

Sincerely,

Deborah Nelson  
4905 NE 47th Ave  
Vancouver WA 98661

## Schroader, Kathy

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**From:** Janine Hook <janine@hookedonclarkcounty.com>  
**Sent:** Tuesday, September 15, 2015 7:11 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** I'm against Alternative 4

Although it would help some of my clients by enabling them to divide their larger parcels of land, it's bad for Clark County in the long run. It would cut down on our local organic farming due to the higher income to be earned from more and smaller parcels being sold. It would encourage the expansion of sewer and public water to far areas of the county, which is expensive, and the cost usually falls mostly on existing taxpayers, not on the developers and builders and landowners who benefit the most from the additional buildable land.

There will be more roads to take care of, also mostly costly to the existing taxpayers, as road impact fees never cover the cost to build the roads. And it will overcrowd our schools, and cost more to build new ones, again mostly on the shoulders of existing taxpayers, as school impact fees don't cover the total cost either.

Finally, it cuts down on the beauty and recreation value of being able to drive through rural areas, one of the reasons people like to come here to live instead of to Portland or Beaverton.

Thanks,



Janine L. Hook, J.D., CRS, GRI, ABR, e-PRO certified, SRES, EcoBroker  
Keller Williams Premier Partners

Tel: 360-600-1050 Fax: 866-596-2661

<mailto:janine@hookedonclarkcounty.com>

[www.VancouverWashingtonHomes.com](http://www.VancouverWashingtonHomes.com)

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[www.facebook.com/janine.hook.92](http://www.facebook.com/janine.hook.92)

**Schroader, Kathy**

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Wednesday, September 16, 2015 8:47 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No: 263755000

Subject: 2016 Comp Plan - Alt 4

Comments:

I am adamantly against alternative 4. Clark County does not have the necessary funding or capital facilities to handle the impacts, especially for safe, adequate transportation. The zoning changes will permanently change the rural nature of the county adversely from numerous negative environmental impacts to water, land, and natural resources. Further, there are legal and operational impacts to home owners associations that have clearly not been taken into consideration. The adverse impacts will result in contractual issues with the terms of an association, as well as create unnecessary conflicts between home owners. Contractual issues that will arise from funding for road maintenance, and conflicts between zoning and HMO restrictions. The County Councilors need to exercise good judgement when they vote, and separate personal opinions from what is best for the future of the county and its residents. Alternative 4 has very negative implications, and unintended consequences for the entire region.

Submitted by:  
L.M. O'Leary

Email: [linda.oleary@clark.wa.gov](mailto:linda.oleary@clark.wa.gov)

Address:  
39609 NE Meyers Road  
La Center, WA



## Schroader, Kathy

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**From:** Steve Bacon <SBacon@crwwd.com>  
**Sent:** Wednesday, September 16, 2015 9:06 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** Draft SEIS comments

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement issued regarding the upcoming Comprehensive Plan amendment.

Clark Regional Wastewater District would like to bring the following items to your attention:

- There is an inconsistency between the descriptions for Alternative 3 on pages FS-1 and S-4. People reading the fact sheet are left to believe that only La Center and Battle Ground UGA's will expand, while the actual proposal also increases the UGA's of Ridgefield and Washougal.
- On page 1-11 the two bullet points under "Vancouver UGA Urban Reserve" appear to describe the same area ("50<sup>th</sup> Avenue between 199<sup>th</sup> and 179<sup>th</sup>", and "50<sup>th</sup> Avenue south of 199<sup>th</sup>")
- In Table S-2 on page S-6 the Alternative 3 statement for public utilities is not completely accurate. Sewer service has not been planned for the Ridgefield expansion. The District will need to update our Comprehensive Sewer Plan to provide service. That effort is under way.
- On page 8-3 (Section 8.1.9) the description of the partnership between the jurisdictions is somewhat of a mischaracterization. Clark County, CRWWD Battle Ground and Ridgefield joined together to form the DCWA; but that entity only deals with treatment. CRWWD has taken ownership of the collection systems in Ridgefield; but all other jurisdictions continue to operate their own collection systems.
- On page 8-8 (Section 8.2.9) there is an inaccuracy similar to the one noted above. Clark County, Battle Ground and Ridgefield did not combine wastewater systems to form CRWWD. Clark County, CRWWD, Battle Ground and Ridgefield formed DCWA to consolidate wastewater treatment resources. Ridgefield also transferred their collection system to CRWWD.

**Steve Bacon, P.E.**

Development Program Manager | Clark Regional Wastewater District  
8000 NE 52 Court, Vancouver WA 98665 | PO Box 8979, Vancouver WA 98668  
Office: 360.993.8810 | Email: [sbacon@crwwd.com](mailto:sbacon@crwwd.com)  
*APWA Accredited since 2005*

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**Schroader, Kathy**

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**From:** susan rasmussen <sprazz@outlook.com>  
**Sent:** Wednesday, September 16, 2015 9:38 AM  
**To:** Cnty 2016 Comp Plan

Sent from Windows Mail

## Schroader, Kathy

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**From:** Mckain, Emelie L (DFW) <Emelie.Mckain@dfw.wa.gov>  
**Sent:** Wednesday, September 16, 2015 10:54 AM  
**To:** Cnty 2016 Comp Plan  
**Cc:** Howe, David L (DFW); Folkerts, Keith E (DFW); Tyler, Kevin  
**Subject:** WDFW Comments: Clark County Draft Supplemental EIS  
**Attachments:** WDFW\_Comments\_CC\_DSEIS\_2015.pdf

Hello,

Attached you will find the comment letter from Washington Dept. of Fish & Wildlife regarding the Clark County Draft Supplemental Environmental Impact Statement, as part of the 2016 Comprehensive Growth Management Plan Update.

Thank you for your time and consideration of these recommendations.

Sincerely,  
Emelie McKain

Emelie McKain  
Region 5 Assistant Regional Habitat Program Manager  
2108 Grand Blvd. Vancouver, WA 98661  
[Emelie.mckain@dfw.wa.gov](mailto:Emelie.mckain@dfw.wa.gov)  
O: 360.906.6764 | M: 360-401-5317





State of Washington  
DEPARTMENT OF FISH AND WILDLIFE  
Southwest Region 5 • 2108 Grand Boulevard, Vancouver, WA 98661  
Telephone: (360) 696-6211 • Fax: (360) 906-6776

September 16, 2015

Clark County Community Planning  
Attn: 2016 Comp Plan Record  
PO Box 9810, Vancouver WA 98666

**RE: WDFW Comments on 2<sup>nd</sup> REVISED Comprehensive Plan Draft Supplemental EIS Available for Review**

Dear Mr. Orjiako,

Thank you for the opportunity to comment on the proposed **August 2015 Draft Supplemental Environmental Impact Statement** relating to the Clark County 2016 Comprehensive Growth Management Plan Update. The Washington Department of Fish and Wildlife (WDFW) believes that the county has done a good job creating viable growth options that balance the varied and complex needs of the county, its residents and fish and wildlife. We offer comments in the hope to find a solution that best meets county growth and conservation goals. **Washington Department of Fish & Wildlife recommends adopting Alternative 3** and adjusting the Urban Growth Areas by a more appropriate amount than outlined in the 2007 EIS.

It is our understanding that the proposed Alternative 3 creates the best potential scenario for the success of fish and wildlife in the county. In addition, the new projected county growth rates along with the availability and productivity of suitable fish and wildlife habitat are unlike previously assessed rates in 2007, therefore giving way to a more appropriate growth plan.

Alternative 3 will bring an additional 78 acres of valuable fish and wildlife habitat conservation areas into potentially developable areas<sup>1</sup>. This amount of disturbed habitat is significantly less than Alternatives 2 & 4 which at a maximum provide 65,500 acres for potential development<sup>1</sup>. Fish and wildlife would likely experience negative effects from more intensive development within UGA expansion areas such as habitat fragmentation, loss of native vegetation, increased noise and light disturbance and increased stormwater pollution. While these negative effects are not ideal, mitigation can occur on a project basis to minimize the cumulative damage to watersheds and larger habitat areas.

In addition, this alternative takes into account the complexities of collaborative planning; the socioeconomic and residential needs of the county are nicely balanced with the needs of fish and wildlife by emphasizing development to fill in existing urban areas. This alternative promotes the

<sup>1</sup> 2016ClarkCountyCompPlanDraftSEISSearch.pdf

build out of existing UGA boundaries instead of classifying high quality habitat in rural and forested areas into more easily developed zoning classes as proposed in Alternatives 2 & 4. This strategy promotes the integrity of high quality habitat as well as high functioning rural land.

Washington Department of Fish and Wildlife endorses the proposed Alternative 3 to the Clark County 2016 Comprehensive Plan Update. We also offer to collaborate on crafting approaches to development and future land use. WDFW is always available for questions regarding the above comments and is open to meeting with the county to discuss further options. Our agency greatly values our cooperative relationship with the county and respects the efforts made to find the right balance between many separate complex factors in regards to drafting the 2016 Comprehensive Growth Management Plan.

Again, we thank you for the opportunity to provide input on the Draft Supplemental Environmental Impact Statement. Please contact me should you have questions or need additional information.

Sincerely,



Emelie McKain  
Region 5 Assistant Regional Habitat Program Manager  
Washington Department of Fish & Wildlife  
2108 Grand Blvd. Vancouver, WA 98661  
Emelie.mckain@dfw.wa.gov  
360.906.6764

cc: Dave Howe, WDFW Region 5 Habitat Program Manager  
Kevin Tyler, Clark County Resource Enhancement and Permitting Manager  
Keith Folkerts, WDFW Land Use Policy Lead

Bryon Bestul  
7607 NE 299<sup>th</sup> St  
Battle Ground, WA 99604  
September 13, 2015

RECEIVED  
SEP 16 2015

Clark County Community Planning  
Attn: 2016 Comp Plan Record  
P.O. Box 9810  
Vancouver, WA 98666-9810

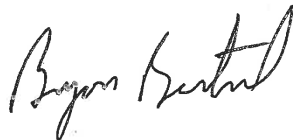
Dear Clark County Community Planning

I am writing this letter to voice my concern about the upcoming comprehensive growth plan. I live at the above listed address (property identification numbers 224835000 and 224736000). I write in favor of alternative four with revisions to encompass a wider variety of properties. Referencing the map of rural zoned lots that are nonconforming my property is not listed as nonconforming.

I have a 5 acre and a 25 acre lot currently and they are both zoned ag-20. Alternatives 1-3 do not allow to me room to divide my land as I wish in that I will either stay at ag-20 or ag-10. Alternative 4 still only allows my property to be zoned ag-10. It is important to note that the properties to the north and south of mine are zoned ag-20 inappropriately as they are each 5 acre lots. I would like to be able to divide my property in 5 acre minimums to reflect the properties surrounding mine. Allowing me to zone my property in this manner will not change the rural feel of this area just merely continue what is already there.

We need to address the rural property owner's issues right now, and clean up the zoning inadequacies throughout the county. We cannot wait another 20 years to address these issues. This timeframe is unacceptable. We need to lift the moratorium that is holding hostage good honest land owners that want to divide their property to give or sell to family members. Looking at the growth plan as a whole we need to do what is best for the entire group. These ag-20 and ag-40 parcels that are designated for farming in Clark County are not being used as farms for primary incomes. The return on the investment into these properties is just not there. Once again, we want to have some control and say into how we divide our property for our families. Thank you.

Sincerely,



Bryon Bestul

RECEIVED  
CLARK COUNTY

SEP 15 2015

Sept. 15, 2015

Draft SEIS COMMUNITY DEVELOPMENT  
Clark County ~~Community~~ Planning

Dear Sirs and Mam,

The Growth Management Plans has many flaws. Most who support the GMP say <sup>need</sup> to save water, farmland and prevent urban sprawl, but many of what they say do not prove factual.

The testimony on Thursday was mostly facts and about the unfair treatment of the rural property owners. What the property owners are proposing is not urban sprawl.

What cities propose, no change in the GMP to keep plan #1, so property owners next to cities can't divide 80-40-20 acres up, which they say will be urban sprawl which is not, but cities want it left in big parcels so when the GMP boundary is moved they can divide into small lots + apartments which is fine for those who want to live there.

I can't put the second house on my 25 A. which would produce a lot more if it was 2 1/2-5, but move the GMP boundary + they can put up to 12 units per A. or more.

Pretty unfair  
If rural land owners could break land into smaller lots of 1-2 1/2-5 A estates it would be too expensive to buy some of the land to put 6-7 units per A or apartments and would prevent urban sprawl.

Most rural area residents just want to share the land they have worked so hard to improve with family + friends. How do we pollute less + use less water living in urban the rural and if you drive around the county there are many bigger pieces of land producing lot of weeds, junk brush + blackberry (weeds) so 1-2 1/2-5 A. could produce so much more. just on the 30' x 45' ←

I have a little garden, 30' x 45' and produce way more than family can use so give abt away and with a little more effort could double it. So lets be fair to help improve + protect our neighbors property and living + not regulate beyond reason + common sense.

If consider everyone, only one plan does that. Support plan #1 which will even help the urban people more.

Sincerely, John Matson  
11930 N.E. Ward Rd  
Buck Prairie, Wa 98

**Schroader, Kathy**

---

**From:** Denis Markian Wichar <deedub@webtv.net>  
**Sent:** Wednesday, September 16, 2015 12:19 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** Comments on Comprehensive Plan

- 1) not enough preservation of farmland
- 2) not enough impact fees from developers
- 3) not enough protection for & planting of trees
- 4) too much land for irrationally-big mansions
- 5) too much tax-free land for mega-churches

Den Mark Wichar  
711 W 25 St  
Vancouver WA 98660  
360-694-3703



**Schroader, Kathy**

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Wednesday, September 16, 2015 12:50 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Comprehensive GMP update

Comments:

I believe Option 1 is the best option for Clark County

Submitted by:

Raymond Steiger

Email: [steiger@teleport.com](mailto:steiger@teleport.com)

Address:

16101 NE 183rd St  
Brush Prairie, WA

## Schroader, Kathy

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**From:** Amber Scott <amber.scott@esd112.org>  
**Sent:** Wednesday, September 16, 2015 12:58 PM  
**To:** Cnty 2016 Comp Plan  
**Cc:** Marnie Allen; Mark Mansell (mark.mansell@lacenterschools.org); Eric Eisemann; Orjiako, Oliver  
**Subject:** Comments for Growth Management Plan  
**Attachments:** Letter to Planning Commission.pdf

Good Afternoon,

Attached please find correspondence from Marnie Allen, with enclosures, in regard to the preferred La Center Urban Growth Boundary.

Please let me know if you have any questions. Thank you!

### **Amber Scott**

**Administrative Assistant for  
Marnie Allen, Executive Director | Human Resources and Legal Services**

**Direct Line: 360-952-3323**  
Educational Service District 112

[amber.scott@esd112.org](mailto:amber.scott@esd112.org)  
2500 NE 65 Avenue | Vancouver | WA | 98661



**EDUCATIONAL  
SERVICE  
DISTRICT 112**

2500 NE 65 Avenue, Vancouver, WA 98661 | T 360 750 7500 F 360 750 9706 TDD 360 750 7510

**Counties**

Clark  
Cowlitz  
Klickitat  
Pacific  
Skamania  
Wahkiakum

**Board of Directors**

Ann Campbell  
Richard Graham  
Rainer Houser  
Patricia Kellogg  
Marilyn Koenninger  
Darlene Stickel  
Steve Wrightson

**Superintendent**

Tim Merlino

September 16, 2015

Via Email: [comp\\_plan@clark.wa.gov](mailto:comp_plan@clark.wa.gov)

Clark County Planning Commission  
1300 Franklin Street, 3<sup>rd</sup> Floor  
Vancouver, WA 98660

Re: Preferred Urban Growth Boundaries

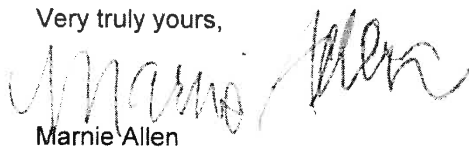
Dear Commission:

I am submitting this letter on behalf of the La Center School District to respectfully request that your recommendation for the preferred La Center Urban Growth Boundary include the real property the La Center School District needs for a future school site.

The La Center School District owns property at the intersection of NW Bolen Street and NW 14<sup>th</sup> Avenue, adjacent to the existing La Center Urban Growth Boundary. On January 14, 2015, the District requested that the City include this property in the City's requested amendments to the La Center Urban Growth Boundary. On March 1, 2015, the City submitted its request to expand the La Center Urban Growth Boundary to include, among other things, the District's future school site. The District and City letters are enclosed.

This letter confirms the District's need to have real property within the Urban Growth Boundary for a future school site. We appreciate your considering the District's and City's request to include the District's property in the preferred La Center Urban Growth Boundary.

Very truly yours,



Marnie Allen

Enclosures

c: Dr. Mark Mansell, Superintendent, La Center School District  
Eric Eisemann, E2 Land Use Planning, LLC



PO Box 1840 • 725 Highland Road  
La Center, WA 98629  
Tel 360.263.2131 • Fax 360.263.1140

January 14, 2015

Dear Mr. Sarvis,

This letter is a formal request to have the La Center School District property (Clark County Identification Number: 258647000) located at the intersection of NW Bolen St. and NW 14<sup>th</sup> Ave. become part of the City of La Center's Urban Growth Boundary (UGB).

The district purchased this property in 2006 as a potential school site. In 2008 the district put before the voters a request to build an elementary school on this site. Even though the request was not approved, it shows a clear record of the district's interest in using this property as a potential site for a school. This parcel is the only piece of property owned by the district suitable to build a new school in order to handle future growth.

Since this property is adjacent to the city's current UGB (NW Bolen St.), we have determined it is in the best interest of the district to have this parcel become part of the City of La Center. As you know, the first step in being included within the city's boundaries is to have the land designated as part of La Center's UGB. We believe being part of the city will be much more efficient because all of our school properties will be within the city limits.

With all this in mind, I respectfully request that the City of La Center's current request to Clark County include this school district property be moved into the UGB so it will be considered as part of the county's updated comprehensive plan. Thank you in advance for considering this request.

Sincerely,

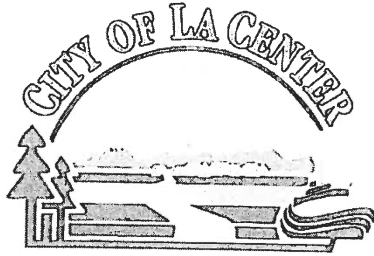
A handwritten signature in black ink, appearing to read "Mark Mansell". The signature is written in a cursive style with a large initial "M".

Dr. Mark Mansell  
Superintendent

Cc: La Center School District Board of Directors, Mayor Jim Irish, La Center City Council

Educating children for tomorrow's world.

021501



Department of Public Works

March 1, 2015

360.263.7665 • Fax 360.263.7666 • www.ci.lacenter.wa.us

419 E. Cedar Ave., Ste. A201 • La Center, WA 98629

Oliver Orjiako, Director  
Clark County Community Planning  
1300 Franklin St.  
PO Box 9810  
Vancouver, WA 98666-9810

Re: *Request to expand the La Center Urban Growth Boundary during the 2016 Comprehensive Plan Update*

Dear Mr. Orjiako,

On February 5, 2015, by letter from Oliver Orjiako, and February 12, 2015, by email from Laurie Lebowsky, 2015, Clark County Community Planning (CCCP) provided the City's with a detailed list outlining the materials the County will require relating to UGA expansion requests. The County requires that the City:

- Re-affirm previous UGA expansion requests, and
- Submit new UGA expansion requests, if needed or different from previous requests.

All requests must include the following:

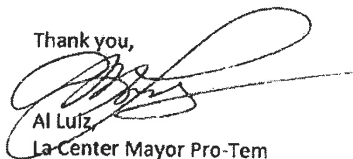
- A. Map clearly indicating the subject parcels;
- B. Narrative providing all applicable information regarding the subject parcels zoning, comprehensive plan designation, etc.,
- C. Indication of the proposed land uses for the subject parcels;
- D. Detailed explanation why these parcels should be brought into the UGB; and
- E. Indication whether the subject parcels were studied under the 2007 Comprehensive Plan maximum study area.

Community Planning established the following deadlines:

- Any city requesting a UGA expansion must submit their UGA request and supporting documents to Clark County by March 3, 2013.
- Draft de-designation analysis of agricultural lands must be provided to County planning staff by May 1, 2015.

By this letter, the City of La Center reaffirms its request to expand the La Center Urban Growth Boundary and reaffirms its recommendations relating to relevant Clark County Comprehensive Plan Policies.

Thank you,

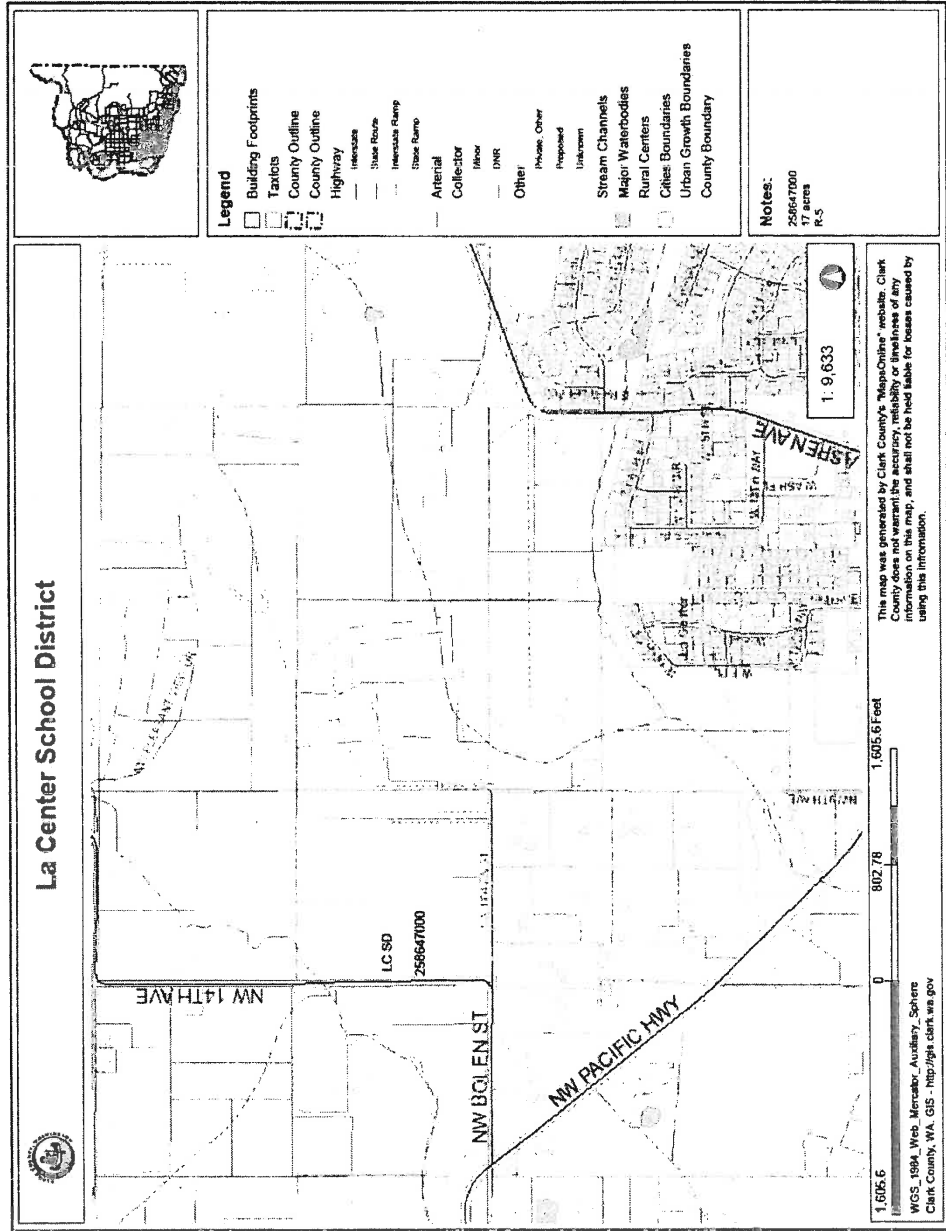


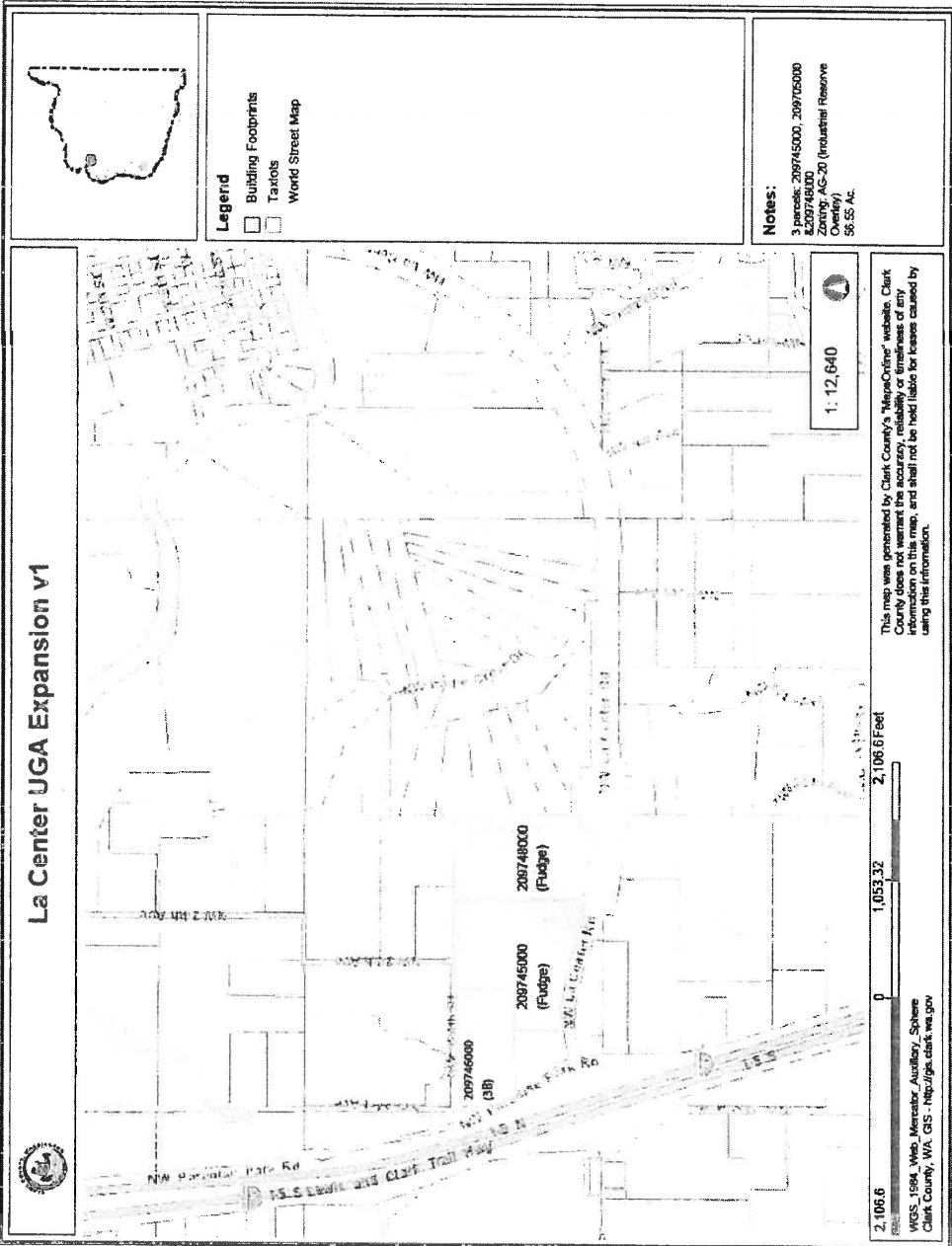
Al Lutz  
La Center Mayor Pro-Tem

Attachments



A. Maps indicating the subject parcels





**B. Narrative**

**La Center School District**

The La Center School District requests that 17 acres of land zoned R-5 be included in the La Center UGA. The La Center City Council unanimously endorsed the proposal in a public meeting and forwarded its endorsement to Clark County. When the School District parcel is added to the La Center UGA the City will annex the property and apply a Public Facilities zone which allows schools and school-related uses. See Figure B1 regarding or pertinent parcel information.

Location	Address (Owner)	Zoning	Gross Acres
Intersection of NW Bolen Rd. and NW 14 <sup>th</sup> St. 35301 NW 14 <sup>th</sup> Avenue, La Center WA #29 SEC 33 T5NR1EWM 17 A. Assessor's PIN: 258647000	La Center School District 725 Highland Road PO Box 1840 La Center, WA 98629	R-5	17

Figure B1 – La Center School District request.

**La Center Employment Land**

The City of La Center supports the request of the Fudge Estate and 3B NW LLC to add approximately 56.55 acres of land to the La Center UGA. The properties were included in the 2007 La Center UGA but the County subsequently removed these and other parcels from the City's UGA in response to "Clark County v. W. Wash. Growth Mgmt. Bd."

The properties are currently zoned AG-20 with an Industrial Reserve overly. The City, working on behalf of the Fudge Estate, engaged the services of Globalwise, Inc. to conduct an analysis of the long-term commercial significance of the Fudge Estate properties. 3B NW LLC has also engaged Globalwise, Inc. to conduct a parallel study. Both studies are in progress and will be completed by May 1, 2015.

Location	Address (Owner)	Zoning	Gross Acres
The NE corner of the I-5 and La Center Road interchange Assessor's PIN: 209746000	3B NW LLC 7320 NE St. Johns Rd., Vancouver, WA 98665	AG-20 (Ind. Reserve)	12.45 Ac.
The NE corner of the I-5 and La Center Road interchange Assessor's PIN: 209705000	Fudge Estate c/o Griffith Trust PO Box 180, La Center, WA 98629	AG-20 (Ind. Reserve)	24.10 Ac.
The NE corner of the I-5 and La Center Road interchange Assessor's PIN: 209748000	Fudge Estate c/o Griffith Trust PO Box 180, La Center, WA 98629	AG-20 (Ind. Reserve)	20.00 Ac.
			56.55 Ac.

Figure B2 – La Center Employment Lands request.



### **C. Proposed land uses**

#### La Center School District

The La Center School District proposes to use the subject property for an elementary school and associated school uses, including a parking lot and athletic fields.

#### Junction Employment Lands

The City anticipates that the subject properties will be designated and zoned for employment use. In 2007 Clark County, at the City's request, designated the subject parcels for Commercial use. The City developed a subsequent sub-area plan for the 2007 La Center Junction which continued to envision zoning the subject properties for employment use. The City did not adopt the sub-area plan because of the adverse decision in "*Clark County v. W. Wash. Growth Mgmt. Bd.*" However, if the subject properties are added to the UGA the City will zone them for retail employment use.

### **D. Why these parcels should be brought into the UGB**

#### La Center School District

In 2006 the La Center School District purchased the subject property for future use as an elementary school. The same year the School District submitted an application for Type I Habitat Predetermination for the purpose of establishing the future location for an elementary school, parking lots and athletic fields. On October 31, 2006 Clark County issued a Staff Report and Decision relating to the school planning request. (Clark County HAB-2006-0023.)

Countywide plan policies (CWPP) require the county and each city "to give full consideration to the importance of school facilities and encourage development of sustainable learning environments through the adoption and implementation of county and city comprehensive land use plan policies and development regulations". (CWPP 10.1.1.) In addition, "[T]he county and each city shall include sufficient vacant land at adequate sizes in the future land use categories to meet projected demand for new schools. (CWPP 10.1.3.)

A goal of the Clark County Comprehensive Plan is to "encourage the location of new school facilities in areas where they can best serve students and the community". Clark County Comprehensive Plan Policy (CCPP) 10.2.1 states, "School facilities serving predominantly urban populations should be preferably located in urban growth areas then in rural areas adjacent to the urban growth boundary." The La Center School District serves an urban and rural population. In addition, CCPP 3.2.6 strongly encourages schools to locate within the urban growth areas.

Consequently, locating land owned by the La Center School District that will be used for school purposes is entirely consistent with the Clark County Comprehensive Plan.

#### Junction Employment Lands

In 2007 the La Center Comprehensive Plan forecast a 2024 population of 9,827 persons and 4,065 total jobs which would be consistent with the County's 2035 Planning Assumption of 1.1 jobs per household. However, La Center lost a significant amount of employment lands as a result of a successful court challenge to the County's 2007 Comprehensive Plan and the jobs to housing ratio in La Center is out of balance.

The current La Center 2035 population is approximately 7,000 people. Currently, there are approximately 825 jobs in the La Center UGA. The County proposes to allocate 1,367 jobs to La Center based on current Vacant Buildable Lands (VBL) analysis. The resulting 2,192 total jobs are out of balance with the County's preferred Jobs to household goal. Consequently, to help address the shortfall, La Center proposes a small expansion of its UGA for employment purposes and will evaluate up-zoning land in the downtown core.

**E. 2007 Comprehensive Plan maximum study area**

The La Center School District purchased the subject property in 2005 for the purpose of locating a new school there. The district voters did not approve the bond request in 2006 and the District put the expansion plans on hold. Consequently, the subject parcel was not part of the 2007 Comprehensive Plan maximum study area.

The La Center Junction employment area request was part of the 2007 Comprehensive Plan maximum study area and was included in the 2007 La Center UGA as Commercial land. (See detail of 2007 La Center UGA map below.) However, Clark County removed this area, and hundreds of additional acres around the La Center Junction from the La Center UGA in compliance with "*Clark County v. W. Wash. Growth Mgmt. Bd.*", 161 Wn. App. 204 (2010).

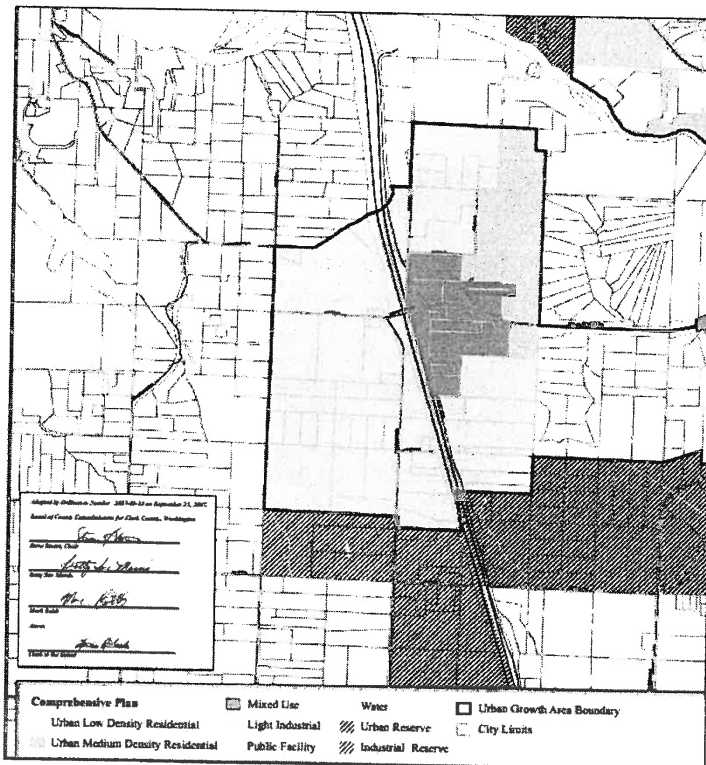


Figure E1. La Center 2007 Comprehensive Plan Map. Source: [http://www.clark.wa.gov/planning/comp\\_plan/documents/Newmaps/LAC Adopted\\_092507\\_32x32.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/Newmaps/LAC_Adopted_092507_32x32.pdf)

## F. Additional Comprehensive Plan Policy Requests (submitted in July 2014)

The City applauds the several of the Principals and Values the Board of Clark County Commissioners (BOCC) has offered. Among them are:

- **Employment Lands:** Equalize land allocation and jobs/population ratio so that cities have equitable share of jobs – diverse job base
- **Other Land Use:** Respect cities' investment in capital facilities by not shrinking the 2007 urban growth boundaries
- **Mapping Implications:** La Center needs greater economic diversification opportunities and multi-family land use designations

The City has reviewed the proposed amendments to the County-Wide Plan Policies (CWPP) and offers the following comments into the record:

- CWPP 1.1.18. As a consequence of the legal challenge to the 2007 County Comprehensive Plan, La Center lost a significant portion of its job creating potential. Consequently, there is no longer any need for an additional bridge across the East Fork of the Lewis River connecting the La Center Junction and the City. The City suggests that the County delete CWPP 1.1.18. ~~The City of La Center shall be the primary agent for planning, permitting, funding, constructing and maintaining a new bridge crossing the East Fork Lewis River outside the La Center Urban Growth Area. The new bridge shall meet or exceed county and city public works and environmental standards. Prior to the next county comprehensive plan update, Clark County shall incorporate the new bridge and necessary arterials into the Clark County Arterial atlas and may provide technical assistance.~~
- CWPP. 1.1.19. In 2007, the BOCC recognized that the federal government may establish a tribal reservation near the La Center UGA. In the eventuality that the land near La Center is placed in Federal trust, in 2007 the BOCC offered to make La Center whole by adding new employment lands into the City's UGA. Establishment of 152 acres of trust land at the La Center I-5 Junction is not premature conjecture. The Federal government will create a 152 acre reserve out of land that the Clark County Comprehensive Plan currently designates as AG-20/Industrial Reserve.

The City proposes to preserve the intent of CWPP 1.1.19 while clarifying the language of the existing policy as follows: "An additional 120 acres +/- of industrial land ~~located west of Interstate 5 and east of 41st Avenue, and south of 309th Street and north of 299th Street~~ shall be added to the La Center Urban Area as an out-of-cycle subarea amendment if the United States government recognizes a new tribal reservation on land currently designated for Industrial Reserve near within the La Center Urban Area." (See Industrial Reserve below.)

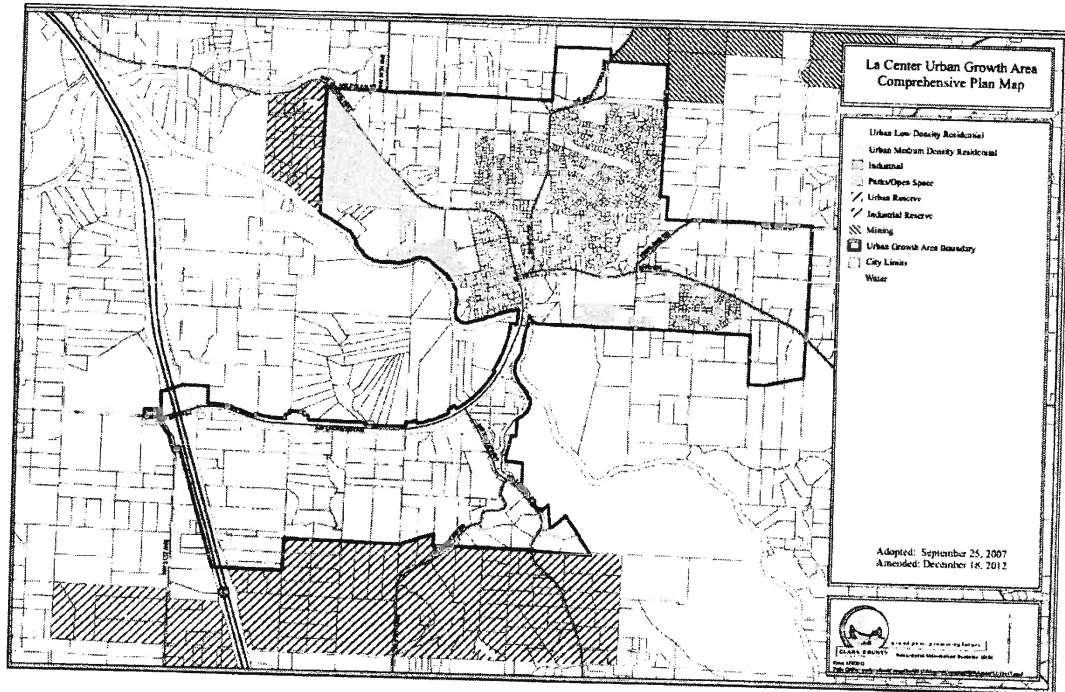


Figure F1. La Center 2007 Comprehensive Plan Map. La Center area Industrial Reserve cross-hatched in red. Source: [http://www.clark.wa.gov/planning/comp\\_plan/documents/Figure14-LaCenter\\_2012Amend.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/Figure14-LaCenter_2012Amend.pdf)

**Schroader, Kathy**

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**From:** Bridget McLeman <bridget.mcleman@gmail.com>  
**Sent:** Wednesday, September 16, 2015 1:10 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** GMA Comment  
**Attachments:** GMA 2 copy.pages

Please accept this as my comment on the proposed alternatives under the GMA process:

**Schroader, Kathy**

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**From:** LISA <irwin36@msn.com>  
**Sent:** Wednesday, September 16, 2015 1:44 PM  
**To:** Madore, David; Mielke, Tom; Stewart, Jeanne; Cnty 2016 Comp Plan; Orjiako, Oliver; Schroader, Kathy  
**Cc:** tim rodgy @ gmail; lirwin.rodgy@gmail.com

Site specific request for rezone of property in the Alternative 4 for the 2016 Clark County Comprehensive Plan updates.

Property Identification Number: 181553000

Site Address: 19115 NE 42nd Ct., Ridgefield, 98642

Abb. Legal Description #117 SEC 12 T3N R1EWM 5A

We have lived at 19115 NE 42nd Ct. in Ridgefield for 25 years and have watched areas adjacent to our neighborhood, especially to the south and west, and more recently to the north develop into smaller parcels (1/2-2.5 acres). The proposed re-zoning plans for our immediate neighborhood **are not consistent** with other neighborhoods in our 20-block radius. The neighborhood immediately to the west has been developed into 2.5 acre homes and very recently homes along NE 29th Ave (between 179th and NE 199th) have been built on one acre parcels. In several sections along the periphery of our 20-block radius are homes built on 1-2.5 acre parcels or less.

Prior to 1994, our property was zoned 1 and 2.5 acre parcels. For over 20 years now we have been zoned UR-10 holding. This practice of leaving the UR-10 overlay in place for this length of time is an abuse of the urban reserve overlay. This is illegal per GMA. As we age, we want the ability to sub-divide our property into a smaller parcels, 1 or 2.5 acres so that we can stay in our community while downsizing into a smaller, one level home. This property is part of our retirement and we never imagined that 25 years later as the North County developed we would still be placed in urban-10 holding, or even five acres zoning, zoning which is inconsistent within or adjacent to our immediate neighborhood.

With growth around Legacy Salmon Creek Hospital, WSU-V, and within the Discovery corridor and major road and utility expansion to the north, south, and west, it seems that we should be zoned as our neighbors are at 1 to 2.5 acres.

We are highly opposed to having our property zoned as it has been for well over 20 years. Most of us built our homes on one section of our property with the concept that we would be able to sub-divide for the purpose of future land valuation or to build a smaller one level home when we retire.

We would very much appreciate your consideration of re-zoning our area to reflect the North County growth needs and our desire to use our property in a way that will allow us to stay in our community. We request that our property be rezoned to 1-2.5 acre density in the Alternative 4 plan, and the urban reserve overlay be removed.

Lisa Irwin and Timothy Roddy



**Schroader, Kathy**

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**From:** susan rasmussen <sprazz@outlook.com>  
**Sent:** Wednesday, September 16, 2015 1:43 PM  
**To:** Stewart, Jeanne; Mielke, Tom; Madore, David; Cnty 2016 Comp Plan; Orjiako, Oliver; Carol Levanen  
**Subject:** Assessment of Resource Land in the Preferred Alternative, 2007

Dear Councilors, and Planning Commissioners, Data for analysis for the record

This analysis should be included in the Draft SEIS documents, for the public record. The data supports what is written in the Alternative 4 plan.

[http://www.clark.wa.gov/planning/comp\\_plan/documents/Attachment-B\\_Assessment\\_of\\_Resource\\_Land.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/Attachment-B_Assessment_of_Resource_Land.pdf)

Sent from Windows Mail



**Schroader, Kathy**

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**From:** susan rasmussen <sprazz@outlook.com>  
**Sent:** Wednesday, September 16, 2015 1:52 PM  
**To:** Stewart, Jeanne; Madore, David; Mielke, Tom; Cnty 2016 Comp Plan; Orjiako, Oliver  
**Subject:** For the public record and the Draft SEIS review

This is an extensive analysis that clearly shows what is on the ground. I believe this analysis was done in 2007 on behalf of the cities to support their massive increase of the UGB's. It would seem as though the same treatment should be applied county wide; not merely applied to support the UGB's of the cities.

Thank you,  
Susan Rasmussen for CCCU, Inc.

Sent from Windows Mail

**From:** [susan rasmussen](mailto:susan.rasmussen@cccw.com)  
**Sent:** Wednesday, September 16, 2015 1:47 PM  
**To:** [jeanne.stewart@clark.wa.gov](mailto:jeanne.stewart@clark.wa.gov), [tom.mielke@clark.wa.gov](mailto:tom.mielke@clark.wa.gov), [david.madore@clark.wa.gov](mailto:david.madore@clark.wa.gov), [comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov), [Orjiako, Oliver](#), [Carol Levanen](#)

Dear Councilors, and Planning Commissioners, Data for analysis for the record

This analysis should be included in the Draft SEIS documents, for the public record. The data supports what is written in the Alternative 4 plan.

[http://www.clark.wa.gov/planning/comp\\_plan/documents/Attachment-B\\_Assessment\\_of\\_Resource\\_Land.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/Attachment-B_Assessment_of_Resource_Land.pdf)

Sent from Windows Mail

## Schroader, Kathy

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Wednesday, September 16, 2015 2:06 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No: 222536000

Subject: alternative 4 comp plan

Comments:

My husband and I are in favor of alternative 4. Our property was homesteaded in 1872. J.R. Anderson Road (our road) is named after my great grandfather, James Anderson. As the family has grown, the property has been divided and passed on to each generation. The 20 acre minimum puts a restriction on our right to transfer property to our heirs. It is a question of fairness. We would like to pass on two 10-acre parcels to two family members rather than allowing only one person to inherit.

Submitted by:  
Peggy Hansen

Email: [plh27@tds.net](mailto:plh27@tds.net)

Address:  
6618 NE J.R. Anderson Rd.  
La Center, WA

**Schroader, Kathy**

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**From:** susan rasmussen <sprazz@outlook.com>  
**Sent:** Wednesday, September 16, 2015 2:02 PM  
**To:** Stewart, Jeanne; Mielke, Tom; Madore, David; Cnty 2016 Comp Plan; Orjiako, Oliver  
**Subject:** The Globalwise Report: Analysis of the Agricultural Economic Trends & Conditions

Dear Councilors, and Planning Commissioners;  
There is much pertinent data in this report for analysis. Please include this information in the public record for the Draft SEIS.

Thank you,  
Susan Rasmussen

[http://www.clark.wa.gov/planning/comp\\_plan/documents/final\\_ag\\_analysis\\_prelim\\_report.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/final_ag_analysis_prelim_report.pdf)

Sent from Windows Mail

**Schroader, Kathy**

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**From:** alec <alec@firestopco.com>  
**Sent:** Wednesday, September 16, 2015 2:42 PM  
**To:** Madore, David; Orjiako, Oliver; Mielke, Tom; Stewart, Jeanne; Cnty 2016 Comp Plan  
**Cc:** susan rasmussen; marcus35@msn.com  
**Subject:** I Support Alternate 4  
**Attachments:** doc04885820150916144620.pdf

Thank you,

Alec Baker  
Owner  
360-909-8273

P 360-718-8604 \* F 888-362-5850  
3203 NE 65th Street, #2  
Vancouver, WA 98663

WA /FIRESCL922OH  
OR / 183279  
CO / 13-1482  
MT / FPL-IEL-000751  
WY / CT-14-29300

>

**Schroader, Kathy**

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**From:** marcus becker <marcusb35@msn.com>  
**Sent:** Wednesday, September 16, 2015 3:10 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** FW: Site specific request. Marcus Becker.

---

From: [marcusb35@msn.com](mailto:marcusb35@msn.com)  
To: [david.madore@clark.wa.gov](mailto:david.madore@clark.wa.gov)  
Subject: Site specific request. Marcus Becker.  
Date: Wed, 16 Sep 2015 22:06:48 +0000

Site specific request for rezone of property in the alternative 4 for the 2016 Clark County Comprehensive Plan updates.

Property Identification Number: 181468000

Site address: 4407 ne 192nd ST. Ridgefield, WA 98642

Abb. Legal Description: #32 of sec 12 T3nr1ewm 5.02a

Prior to 1994 my property was zoned 1 and 2.5 acre parcels. I have been zoned UR-10 for over 20 years. The practice of leaving the overlay in place for this length of time is an abuse of the urban reserve overlay. This is illegal per GMA and has placed undue burdens on my family. My neighborhood has many 1,2.5 and 5 acre lots.

Very few lots in this area conform to the 10 acre zone density.

I request that my property be rezoned to 2.5 acre density in the alternative 4 plan, and the urban reserve overlay be removed.

Thank you for your consideration,

Marcus and Kristina Becker.

## Schroader, Kathy

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**From:** susan rasmussen <sprazz@outlook.com>  
**Sent:** Wednesday, September 16, 2015 12:56 PM  
**To:** Madore, David; Stewart, Jeanne; Mielke, Tom; Cnty 2016 Comp Plan; Orjiako, Oliver  
**Subject:** Bullet points from the Globalwise Study, 2007

### Analysis of the Agricultural Economic Trends and Conditions in Clark County For the public record, Draft SEIS

- Historical conditions; 80% of all farms were less than 50 acres. "Small farms are characteristic of farms in Clark County," Pg. 4.
- "Class I and II land are of high and better than average productivity and support the farms with the highest income. This good farming land however is limited in area." "It's located on the Columbia River bank flood plains, Vancouver Lake, low terraces along the river north of Vancouver, and the drained lake bed of Fargher Lake." "Class III and IV are average productivity. This covers areas 5-15 miles inland from the Columbia River." Pg. 2  
Historical description of extent and location of farms.
- "Lack of income and profit by farmers in Clark County has led to reduced land area in commercial farming." Pg. IV
- "Much of what the Ag. Census is reporting is rural acreages that are comprised of the land area associated with the homes of rural residents who combine non-commercial agricultural activities with their rural lifestyle." Pg. IV-V.
- "The historical farm statistics show that Clark County has always been dominated by small farms. However, small keeps getting smaller." Pg. 4
- "Lower income levels are sufficient to keep some farms in business, particularly the small scale, part time farmers. The absence of growth in net income has led to the long downward slide in this industry in Clark County." Pg. 25
- "In Lewis County's Court case, they advanced the argument that they were establishing the total acreage of agricultural land for designation based on an "agricultural industry needs assessment." "The latest Supreme Court (8/10/2006) ruling provides ample guidance for Clark County to establish its own set of agricultural land designation criteria. The Board of Clark County Commissioners to date has not adopted any new criteria for designation of agricultural land in the county."
- "Most (farms) are small and are struggling to be competitive and remain in business. Existing agricultural zoning and programs of support are not sufficient to help these agricultural operations be competitive in order to remain in business for the long term. Some are located on high quality soils but this is not uniformly true." Pg.49 "
- "For at least the last 30 yrs., agriculture in Clark County has been in a long downward trend in production and farm profits." "Farmers can only sustain themselves when they are profitable." Pg.48

Thank you,  
Susan Rasmussen for CCCU, Inc.

Thank you,

**Schroader, Kathy**

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**From:** susan rasmussen <sprazz@outlook.com>  
**Sent:** Wednesday, September 16, 2015 3:17 PM  
**To:** Stewart, Jeanne; Madore, David; Mielke, Tom; Cnty 2016 Comp Plan  
**Subject:** Globalwise Report, 2007, for the Draft SEIS

[http://www.clark.wa.gov/planning/comp\\_plan/documents/final\\_ag\\_analysis\\_prelim\\_report.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/final_ag_analysis_prelim_report.pdf)

Sent from Windows Mail

## Schroader, Kathy

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**From:** Ann Foster <annfoster5093@gmail.com>  
**Sent:** Wednesday, September 16, 2015 4:01 PM  
**To:** Cnty 2016 Comp Plan; Stewart, Jeanne; Madore, David; Mielke, Tom  
**Subject:** Farmers markets in Clark County and alternatives to the Comprehensive Plan Update

Ladies and gentlemen:

I am requesting that this be part of the public record, as submitted within the public comment period for the Comprehensive Plan Update:

There are currently 7 farmers markets operating in Clark County. These vary dramatically in size, mix of vendors and sales generated. The Vancouver Farmers Market, in downtown Vancouver, operates two days a week and is one of the largest in Washington State; it has opened a second market in East Vancouver this year, 2015. The Camas Farmers Market in downtown Camas operates one market a week. The Salmon Creek Farmers' Markets hosts two a week, at two separate locations. These three market organizations receive support and funding from a variety of businesses and organizations, all of which encourage the vibrancy and healthful eating habits that a farmers market provides within a community. In addition, some of these funding sources support these three markets and their programs to support and incent customers who are under-resourced and are on a food assistance program (examples are SNAP, Fresh Match, and the Farmers Market Nutrition Program).

These three markets, operating a total of 5 days a week (with two markets on Thursdays), make up the bulk of farmers markets in the County. Together they produce significant numbers:

Based upon 2015 numbers to-date, these 5 market locations are generating a total of just over \$5,000,000 dollars in TOTAL sales. The total number of attendees over the course of a given farmers market season is in the hundreds of thousands.

More impressive is that over half of these sales dollars are from farm producers: specialty crop producers, meat and dairy, honey, nursery, and products that are produced from farm products (example, goats milk soaps, bees wax soaps). Notably, farm sales far exceeds the sales from other categories at a farmers market, such as crafts, prepared or processed foods. The bulk of farm producers at these markets are Washington-based.

It's important to note that these numbers do not include some of the smaller, but significant markets in Clark County, such as Ridgefield and Battle Ground, whose numbers are not available at this time.



In addition to generating dollars that remain within the local (ie., SW Washington) region, farmers markets provide marketing opportunities that nurture small businesses by enabling customer interaction, solidification of a customer base, networking, and avenues for a successful business selling wholesale to local grocers. Successful farms hire employees, who are increasingly needed to plant, grow, and harvest crops for market.

Farm businesses in Clark County are continually facing struggles as development encroaches upon productive acreage, creating pollution, water limitations, soil modification, increased traffic (which further generates pollution and livestock interference). The loss of agricultural land - or productive land that is forced into disuse by development - removes more farm businesses from the local economy; and this has a tremendously negative impact on farmers' markets and farm businesses.

As an organizer of the Salmon Creek Farmers' Markets for the past several years, I strongly endorse Alternative 1 to the Comprehensive Plan. The cumulative impact of Alternatives 2 and 4 clearly would contribute and accelerate the loss of productive agricultural land...land that is used for the production of food.

Farmers markets remain a source of community, access to locally-produced (often sustainably grown) produce, as well as eggs, meat, cheeses, vibrancy, healthy communities and a sustainable local food system. Without productive agricultural lands, farmers markets cease to exist. And with that Clark County loses over \$5,000,000 dollars in its pockets.

Best regards,

Ann Foster,

Organizer, Salmon Creek Farmers Markets

Board, Washington State Farmers Market Association

## Schroader, Kathy

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**From:** Orjiako, Oliver  
**Sent:** Wednesday, September 16, 2015 3:27 PM  
**To:** Euler, Gordon; Alvarez, Jose  
**Cc:** Schroader, Kathy  
**Subject:** FW: Corrections to Alternative 4 map - For the public record and the DSEIS review

FYI and for the record. Thanks.

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**From:** Carol Levanen [<mailto:cnldental@yahoo.com>]  
**Sent:** Wednesday, September 16, 2015 3:24 PM  
**To:** Madore, David; Mielke, Tom; Stewart, Jeanne; Orjiako, Oliver  
**Subject:** Corrections to Alternative 4 map - For the public record and the DSEIS review

Clark County Board of Councilors/ Clark County Planning Commission  
P.O. Box 5000  
Vancouver, Washington 98666

Sept 16, 2015

For the Record and DSEIS review

Dear Councilors and Commissioners,

Clark County Citizens United, Inc. has reviewed Alternative 4 maps to consider the accuracy of the information. Using the criteria of the GMA and other counties, of predominant parcel size in an area wide location, the Alt 4 map is fairly accurate. CCCU does not agree that the resource designations comply with the prime agricultural and forest soils and other criteria, under GMA, calling it what is, goes a long way toward compliance with the courts. As landowners later come forward, the soil criteria can be corrected. There are approximately 10 isolated locations, within the zones, that appear to have been missed. CCCU is requesting that those parcels also be included in the overall zone of the area, using proper criteria. The following are the Section numbers in the zones and CCCU recommendation for parcel size change.

1. Should be Agriculture 5 - Sections 51121 and 51128 - North and South of 379th - parcels are uniformly 5 ac.
2. Campers Hide a Way - Sections 63134 and 63135 - is still in 80 acre zone - it should be smaller or have a special recognition.
3. Should be Forest 10 - Section 53123 - Intersection of Rotschy Road and Rotschy Mill Road - East are 10 acres, North is 5-10 acres, South is 10 acres, - close to urban area
4. Should be Forest 10 - Section 43105 - Kelly Road, - North and South, is Forest 10 - Southwest is Rural 5
5. Should be Agriculture 5 - Sections 41112 and 41113 - Landerholm Road - Lockwood Creek Road - North is 5 acre Rural - South is 2.5 acre Rural - West is 5 acre Rural - East is 5 acre Rural
6. Should be Agriculture 5 - Section 42107 - South is 2.5 acre Rural - North is 5 acre Rural - West is 5 acre Rural - East is 5 acre Rural
7. Should be Agriculture 5 - Section 42117 - North, South, East and West are all 5 acre parcels
8. Should be Agriculture 5 - Section 43119 - at 259th and 182nd - South is 2.5 and 5 acre - North is 5 acre
9. Should be Rural 2.5, Rural 5, Forest 10 and Forest 20 - Section 42124 and 43119 - Parcels are 20 acres in size - East is 5 acre Rural, North is 5 acre Rural - West is 2.5 - 5 acre Rural - Next to Village - water and infrastructure.
10. Should be Forest 10 - Section 33123, 33126 and 33127 - North is 2.5 acre - West is 5 acre - East is 10 acre
11. Should be Agriculture 5 - Section 32136 - This is an island of 5 acre parcels - Close to UGB - surrounded by 5 acre Rural and 2.5 acre rural

Clark County Citizens United, Inc. is asking that these areas be changed in the Alternative 4 map.

Sincerely,

Carol Levanen, Ex. Secretary  
Clark County Citizens United, Inc.

## Schroader, Kathy

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**From:** Bridget McLeman <bridget.mcleman@gmail.com>  
**Sent:** Wednesday, September 16, 2015 4:33 PM  
**To:** Schroader, Kathy  
**Subject:** Re: GMA Comment  
**Attachments:** GMA 3 copy.pdf

I apologise - for some reason the setting inserts attachments as open documents. If this doesn't work please email me - - and I'll try again!

Sorry

Bridget

On Sep 16, 2015, at 4:25 PM, Schroader, Kathy <[Kathy.Schroader@clark.wa.gov](mailto:Kathy.Schroader@clark.wa.gov)> wrote:

- > Can you please send this in another format such as word or pdf files. We cannot open the file you sent us.
- > Thanks
- >
- > Kathy Schroader, Office Assistant II
- > Community Planning Department
- > 360-397-2280, X 4958
- > [kathy.schroader@clark.wa.gov](mailto:kathy.schroader@clark.wa.gov)
- >
- >
- > -----Original Message-----
- > From: Bridget McLeman [<mailto:bridget.mcleman@gmail.com>]
- > Sent: Wednesday, September 16, 2015 1:10 PM
- > To: Cnty 2016 Comp Plan
- > Subject: GMA Comment
- >
- > Please accept this as my comment on the proposed alternatives under the GMA process:
- >
- >
- > This e-mail and related attachments and any response may be subject to public disclosure under state law.
- >

## Comments on Clark Clark Growth Management Act

One of the first calls I answered as a volunteer mediator with Community Mediation Services some 15 years ago, was from a pilot who had moved to a home in a rural area north of Battle Ground. He wanted to be able to sleep in peace and quiet. But his morning sleep was disturbed by the rooster crowing in the very early morning at the farm next door. He hoped to resolve the issue by offering to buy a cover for the rooster's cage (like one might do for parrots and perhaps other caged birds to fool them into thinking it was still night). Entirely logical from the perspective of a non-rural home owner. Entirely impractical from the perspective of a farmer.

I thought of this story often as I both listened to testimony on the desirability of changing our current growth management plan to reduce lot size and increase development, and as I explored the back roads of the county in my quest to understand more about what was being proposed.

“McMansions” tend to be incompatible with various farms, wineries, tree farming and the like. We see it play out every week at Council meetings where homeowners on Livingstone Mountain rail at the degradation of their environment by the quarrying commercial enterprise. By adopting Alternative 4, we will be setting on a path to replicate this problem in multiple areas of the county.

I can not imagine the long term cumulative effects of the increase in numbers of lots under Alternative 4. It has not been insufficiently analyzed to understand the unintended consequences of changes that, once made, are likely to be irreversible - everything from flood plains to soil composition, viability of watershed drainage patterns to timber preservation and erosion control.

At the same time, in practical terms, Alternative 4 requires an investment in wells, sewage, roads, public transportation and the like that will be significant and are, as of now, un-costed and un-budgeted.

If we accept that some home owners lost property rights under the last GMA, I don't evidence of exploring adoption of local zoning tools (including TDRs etc) that could address the possibly valid grievances. I do not believe that those who bought restricted lands after that time should profit from the radical changes of Alternative 4 at a cost to Clark County citizens at large.

While I write in favor of Alternative 1 of the Growth Management Act, I also believe the additions in Alternative 3 will not damage the vision of development in Clark County set out in Alternative 1.

I would also be in favor of requesting an extension of the current GMA for one additional year to include specific provisions to address valid versus speculative profit making resolve the divisiveness of the current ill-conceived Alternative 4 with a new more broadly representative County Council.

I don't envy you your task in choosing a preferred alternative. Our remaining unspoiled county is our heritage. The priorities and goals of the earlier plan are not yet realized. We should not abandon our vision with a poorly analyzed last minute alternative that was developed without a vision of how we see the county as a whole. Thank you for your work on our behalf.

Comments submitted by      Bridget McLeman, Ph.D.  
   11401 NE 29th Avenue  
   Vancouver, WA 98686

Please let me know if you would prefer this electronically: [bridgetmcleman@gmail.com](mailto:bridgetmcleman@gmail.com)

**Schroader, Kathy**

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**From:** Amanda Smeller <SmellerA@ci.woodland.wa.us>  
**Sent:** Wednesday, September 16, 2015 4:38 PM  
**To:** Cnty 2016 Comp Plan  
**Cc:** Grover Laseke; Eric Eisemann; Elizabethedecker@jetplanning.net  
**Subject:** Clark County SEIS Comments - City of Woodland  
**Attachments:** Comp Plan SEIS Comment Letter - City of Woodland.pdf

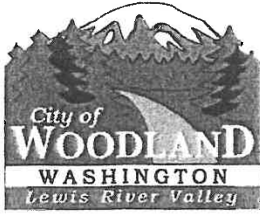
Good Afternoon.

Please find attached a letter from the City of Woodland in regards to the Clark County Draft SEIS for the Comprehensive Plan Update.

Thank you.

-Amanda

Amanda Smeller  
Community Development Planner  
City of Woodland  
230 Davidson / PO Box 9  
Woodland, WA 98674  
(360) 225-1048  
[smellera@ci.woodland.wa.us](mailto:smellera@ci.woodland.wa.us)



P.O. Box 9  
Woodland, WA 98674  
[www.ci.woodland.wa.us](http://www.ci.woodland.wa.us)

200 East Scott Avenue  
fax: (360) 225-1201

**Police**  
(360) 225-6965

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230 Davidson Avenue  
fax: (360) 225-7336

**Building**  
(360) 225-7299

**Mayor's Office  
Clerk-Treasurer**  
(360) 225-1048

**Planning**  
(360) 225-1048

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300 East Scott Avenue  
fax: (360) 225-7467

**Public Works**  
(360) 225-7999

September 16, 2015

Clark County Community Planning  
Comp Plan Comments  
PO Box 9810  
Vancouver, WA 98666

Councilors Madore, Mielke and Stewart,

The City of Woodland offers the following comments into the record relating to the Comprehensive Plan Draft Supplemental Environmental Impact Statement (Draft SEIS).

Clark County and Woodland, by virtue of a portion of Woodland being within Clark County jurisdiction, have been partners during the current Comprehensive Plan update process. Woodland representatives sat at the table during County/City staff coordination meetings and during work sessions with the Board of County Councilors. Staff has been most gracious and we appreciate being included in this element of the process.

During our many meetings, County staff often assured us that Woodland would be a part of the SEIS process and the City could rely on the SEIS, in part, to fulfill its compliance requirements under the State Environmental Policy Act. However, other than identifying Woodland as a place on multiple maps, the Draft SEIS mentions the City of Woodland contains zero substantive analysis of how any of the four alternatives might affect Woodland.

A portion of Woodland city limits is within Clark County; by law the County and City must plan together. Because the text and conclusions drawn within the Draft SEIS do not consider Woodland in any substantive manner, the Draft SEIS as it relates to Woodland is inadequate. We ask that the Final SEIS correct this deficiency and include Woodland in a more substantive way.

Sincerely,

Grover Laseke, Mayor  
City of Woodland  
Clark County, WA

## Schroader, Kathy

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**From:** Andrew Reule <akreule@tds.net>  
**Sent:** Wednesday, September 16, 2015 4:43 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan DSEIS

Regarding the draft Supplemental Environmental Impact Statement for the Clark County 2016 Comprehensive Growth Management Plan:

The analysis of Alternative 4 underestimates the number of potential lots and therefore this alternative's impacts. For example, in the second paragraph on page 2-7, it is stated "...provided that reduced lot sizes do not result in conversions to other uses, there should be no substantive changes or impacts..." Alternative 4 results in the upzoning of some common tracts and remainder parcels within cluster subdivisions (for example parcels 227393020 and 190651016). Although this may require the approval of a new subdivision or plat alteration, this is certainly feasible and should be included in the analysis of impacts. In addition, some lots that will remain too small to divide after upzoning could easily be enlarged through a simple boundary line adjustment. For example, two adjacent lots just under 5 acres in area that are to be upzoned to R-2.5 would not be quite large enough to divide, but a simple BLA between adjacent lots would allow a third lot. In addition, it appears that many "non-conforming" lots proposed for upzoning under Alternative 4 are not non-conforming at all. This is because they appear to have been created by counting adjacent road area. If this is permitted, a lot just under 5 acres upzoned to R-2.5 would allow a division without a BLA. This potential also needs to be considered in gauging the impacts of Alternative 4.

The analysis of water resources under Alternative 4 is not adequate. Due to the additional population allowed in rural areas under this alternative, and the additional lots as referenced above, there needs to be an analysis of shallow aquifer depletion, especially as it relates to surrounding wells. Provisions for clustering as a mitigation measure (page 3-15) would not mitigate impacts to aquifers. While the number of wells may be reduced, the overall volume of water withdrawn would increase.

Due to the sprawling development pattern promoted by Alternative 4, a more thorough analysis of carbon emissions and air pollution is necessary.

Alternative 4 creates probable significant adverse environmental impacts to earth, water, air, fish and wildlife, and natural resources, and transportation systems due to promoting sprawling development patterns. These impacts are not mitigated in the draft SEIS and they are underestimated for the reasons noted in the first paragraph above.



## Schroader, Kathy

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**From:** Heather Tischbein <hctischbein@gmail.com>  
**Sent:** Wednesday, September 16, 2015 5:53 PM  
**To:** Ann Foster  
**Cc:** Cnty 2016 Comp Plan; Stewart, Jeanne; Madore, David; Mielke, Tom  
**Subject:** Re: Farmers markets in Clark County and alternatives to the Comprehensive Plan Update

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Great job, Ann. It's going to be so interesting to see what happens next.

On Wed, Sep 16, 2015 at 4:00 PM, Ann Foster <[annfoster5093@gmail.com](mailto:annfoster5093@gmail.com)> wrote:  
Ladies and gentlemen:

I am requesting that this be part of the public record, as submitted within the public comment period for the Comprehensive Plan Update:

There are currently 7 farmers markets operating in Clark County. These vary dramatically in size, mix of vendors and sales generated. The Vancouver Farmers Market, in downtown Vancouver, operates two days a week and is one of the largest in Washington State; it has opened a second market in East Vancouver this year, 2015. The Camas Farmers Market in downtown Camas operates one market a week. The Salmon Creek Farmers' Markets hosts two a week, at two separate locations. These three market organizations receive support and funding from a variety of businesses and organizations, all of which encourage the vibrancy and healthful eating habits that a farmers market provides within a community. In addition, some of these funding sources support these three markets and their programs to support and incent customers who are under-resourced and are on a food assistance program (examples are SNAP, Fresh Match, and the Farmers Market Nutrition Program).

These three markets, operating a total of 5 days a week (with two markets on Thursdays), make up the bulk of farmers markets in the County. Together they produce significant numbers:

Based upon 2015 numbers to-date, these 5 market locations are generating a total of just over \$5,000,000 dollars in TOTAL sales. The total number of attendees over the course of a given farmers market season is in the hundreds of thousands.

More impressive is that over half of these sales dollars are from farm producers: specialty crop producers, meat and dairy, honey, nursery, and products that are produced from farm products (example, goats milk soaps, bees wax soaps). Notably, farm sales far exceeds the sales from other categories at a farmers market, such as crafts, prepared or processed foods. The bulk of farm producers at these markets are Washington-based.



It's important to note that these numbers do not include some of the smaller, but significant markets in Clark County, such as Ridgefield and Battle Ground, whose numbers are not available at this time.

In addition to generating dollars that remain within the local (ie., SW Washington) region, farmers markets provide marketing opportunities that nurture small businesses by enabling customer interaction, solidification of a customer base, networking, and avenues for a successful business selling wholesale to local grocers. Successful farms hire employees, who are increasingly needed to plant, grow, and harvest crops for market.

Farm businesses in Clark County are continually facing struggles as development encroaches upon productive acreage, creating pollution, water limitations, soil modification, increased traffic (which further generates pollution and livestock interference). The loss of agricultural land - or productive land that is forced into dis-use by development - removes more farm businesses from the local economy; and this has a tremendously negative impact on farmers' markets and farm businesses.

As an organizer of the Salmon Creek Farmers' Markets for the past several years, I strongly endorse Alternative 1 to the Comprehensive Plan. The cumulative impact of Alternatives 2 and 4 clearly would contribute and accelerate the loss of productive agricultural land...land that is used for the production of food.

Farmers markets remain a source of community, access to locally-produced (often sustainably grown) produce, as well as eggs, meat, cheeses, vibrancy, healthy communities and a sustainable local food system. Without productive agricultural lands, farmers markets cease to exist. And with that Clark County loses over \$5,000,000 dollars in its pockets.

Best regards,

Ann Foster,

Organizer, Salmon Creek Farmers Markets

Board, Washington State Farmers Market Association

## Schroader, Kathy

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**From:** CenturyLink Customer <ckeller360@q.com>  
**Sent:** Wednesday, September 16, 2015 6:03 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** Our Comments on the Draft SEIS

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### Draft Supplemental Environmental Impact Statement Comments on the 2016 Growth Management Plan Update

The alternatives outlined in the draft SEIS each have their degree of unavoidable adverse effects. We strongly oppose Alternative 4, as it has the highest potential for negative impacts among all of the presented alternatives, could promote extensive and excessive growth in the county, and could affect the largest amount of acreage. We are alarmed at Alternative 4's proposal to allow dramatic reduction in rural lot sizes. Perhaps instead Clark County should be exploring strategies that would allow large tracts of forested and/or rural lands to remain in their original uses in a way that is not just feasible, but profitable, for the property owner. We oppose Alternative 2 for much the same reasons.

We have no real objections to either Alternative 3, which would address cities' concerns and allow growth within their respective communities. We believe communities should be consolidated with their infrastructure development, and not scattered. We also have no objection to the no-action alternative that would maintain the existing 2007 Comprehensive.

When viewing the various county maps, it appears evident that there has not been historically controlled human growth in Clark County, regardless of past growth management plans and guidelines. And this human growth continues to expand cumulatively into otherwise non-intruded and undeveloped areas. The maps show mosaics of various land uses, such as residences, businesses, infrastructure development, support facilities, and so on, which implies uncontrolled and unregulated past human growth. This has allowed individuals to create their residences, their businesses, secondary businesses, roads and small support businesses, stores, shops, without structured guidelines and constraints.

Our principal concerns on the current growth management plan draft SEIS, on which a preferred alternative should be selected, are:

1. Preservation of continuous tracts of undeveloped rural, farm, and forested properties in the county.
2. Prevention of future human intrusion into undeveloped and non-impacted forested, rural, wildlife habitat, and farmland.
3. Maintaining and addressing the historic, cultural, rural, and cultural perceptions of the county in this planning effort.
4. Consolidating human development in already impacted/developed areas. The current planning effort does not seem to have covered these important issues in appropriate detail. And we do not perceive the term "mitigation" as an appropriate or acceptable means to compensate for unavoidable long-term effects.

We believe more controlled growth, and efforts to enhance the county's agricultural base, are important to Clark County and its residents, than creating thousands of rural lots that will adversely impact taxpayers, the environment, and cultural values.

Carl and Colleen Keller  
Brush Prairie, WA  
[ckeller360@q.com](mailto:ckeller360@q.com)

**Schroader, Kathy**

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**From:** Tim Trohimovich <Tim@futurewise.org>  
**Sent:** Wednesday, September 16, 2015 6:20 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** DSEIS comments on Ridgefield UGA Expansion  
**Attachments:** Futurewise Comments on Comp Plan DSEIS Ridgefield UGA Expansion Sept 16 2015 Final.pdf

Dear Sirs and Madams:

Enclosed please find Futurewise's comments on the Draft Supplemental Environmental Impact Statement for the Clark County 2016 Comprehensive Growth Management Plan Update (August 2015) relating the Ridgefield urban growth area expansion. We are also overnighting the paper original and the referenced enclosures to your offices, not your PO Box.

Please contact me if you require anything else.

**Tim Trohimovich, AICP**  
Futurewise | Director of Planning & Law  
816 Second Avenue, Suite 200 | Seattle, Washington 98104  
p. 206.343.0681 Ext. 118  
Email: [tim@futurewise.org](mailto:tim@futurewise.org)





*Building communities  
Protecting the land*

September 16, 2015

Clark County Community Planning  
Attn: 2016 Comp Plan Record  
PO Box 9810  
Vancouver, Washington 98666-9810

Dear Sirs and Madams:

**Subject: Comments on the Draft Supplemental Environmental Impact Statement for the Clark County 2016 Comprehensive Growth Management Plan Update (August 2015) relating the Ridgefield urban growth area expansion.**

Sent via overnight delivery with enclosures and via email to:  
[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)

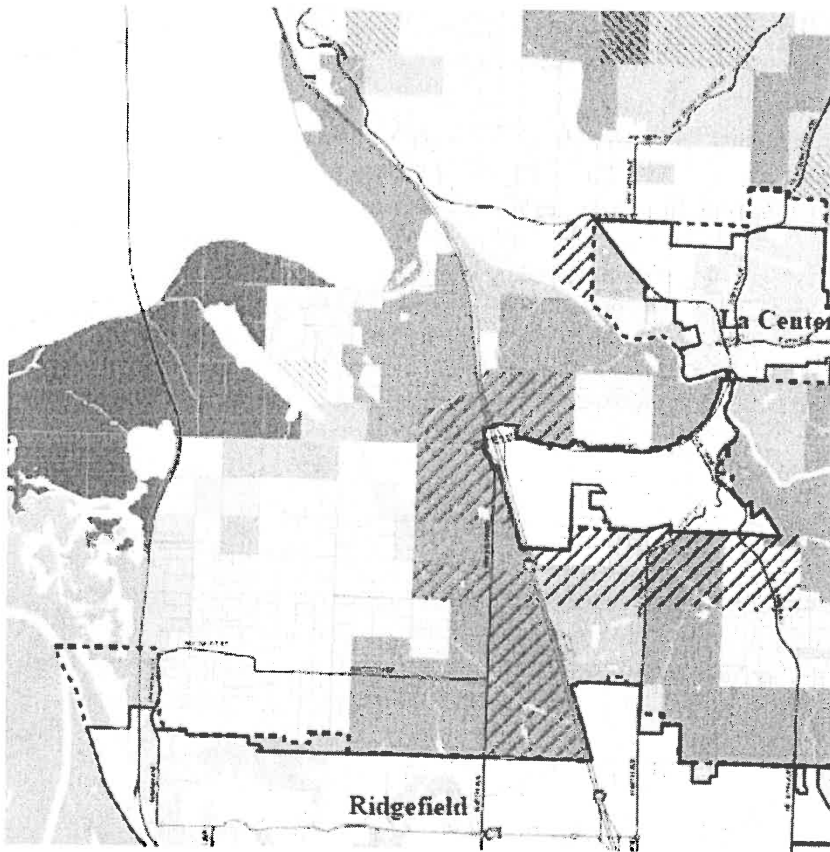
Thank you again for the opportunity to comment on the *Draft Supplemental Environmental Impact Statement (Draft SEIS) for the Clark County 2016 Comprehensive Growth Management Plan Update*. In Futurewise's September 10, 2015 comment letter on the *Draft SEIS* we expressed concern that the Draft SEIS did not identify as one of the adverse impacts of Alternative 3 that the Ridgefield urban growth area expansion violated the Growth Management Act (GMA). This letter will show that the urban growth area (UGA) expansion violates the GMA for three independent reasons. First, under the GMA determinations as to agricultural lands of long-term commercial significance are to be made area-wide. The Ridgefield UGA expansion is only focusing on a small area violating this requirement. Second, the land proposed for an expansion meets the GMA requirements for agricultural land of long-term commercial significance and so cannot be included in an urban growth area unless the county or Ridgefield adopts a purchase or transfer of development rights program applicable to the property and retains its agricultural comprehensive plan designation and zoning. Third, the *Clark County Buildable Lands Report* shows that Ridgefield has a surplus of 280 net acres of residential land at the very low density of six dwelling units per acre and a surplus 168 net residential acres at the observed density.<sup>1</sup> So the SEIS should identify these GMA violations as disadvantages of Alternative 3.

Futurewise is working throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of

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<sup>1</sup> *Clark County Buildable Lands Report* pp. 9 – 10 (June 2015) accessed on Sept. 14, 2015 at: [http://www.clark.wa.gov/thegrid/documents/061015WS\\_2015BUILDABLE\\_LANDS\\_REPORT.pdf](http://www.clark.wa.gov/thegrid/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf) and enclosed with the paper original of this letter.

<b>URBAN</b>		<b>OVERLAY</b>	
Urban Low Density Residential	Rural-10	Urban Reserve	Urban Growth Boundary
Urban Medium Density Residential	Rural-20	Industrial Urban Reserve	City Limits
Urban High Density Residential	Rural Center Residential	Railroad Industrial Urban Reserve	Rural Center
Neighborhood Commercial	Rural Commercial	Mining	Three Creeks Special Planning Area
Community Commercial	Rural Industrial	Columbia River Gorge Scenic Area	
General Commercial	Agriculture	Mining Inside CRGSA	
Mixed Use	Agri-Wildlife	Rural Center Mixed Use	
Industrial	Parks/Open Space		
Heavy Industrial	Forest Tier 1		
Public Facility	Forest Tier 2		
Bonneville Power Administration	Airport		
<b>RURAL/RESOURCE</b>	Urban Reserve		
Rural-5	Water		



Source: *County/UGA Comprehensive Plan Clark County, Washington* accessed on Sept. 16, 2015 at:  
[http://www.clark.wa.gov/Planning/comp\\_plan/documents/AmendComplan\\_2013.pdf](http://www.clark.wa.gov/Planning/comp_plan/documents/AmendComplan_2013.pdf)

## The Ridgefield urban growth area expansion violates the GMA because the property meet the GMA and Clark County Criteria for Agricultural Lands of Long-Term Commercial Significance

Under the GMA, the “land speaks first” and agricultural lands of long-term commercial significance must be conserved and excluded from urban growth areas.<sup>4</sup> The Supreme Court has identified the reason for the conservation mandate:

The GMA set aside special land it refers to as “natural resource lands,” which include agricultural, forest, and mineral resource lands. “Natural resource lands are protected not for the sake of their ecological role but to ensure the viability of the resource-based industries that depend on them. Allowing conversion of resource lands to other uses or allowing incompatible uses nearby impairs the viability of the resource industry.”<sup>5</sup>

Natural resource lands must be conserved.<sup>6</sup> The Washington State Supreme Court has identified a three part test for identifying agricultural land of long-term commercial significance, one of the three types of natural resource lands,

[W]e hold that agricultural land is land: (a) not already characterized by urban growth (b) that is primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2), including land in areas used or capable of being used for production based on land characteristics, *and* (c) that has long-term commercial significance for agricultural production, as indicated by soil, growing capacity, productivity, and whether it is near population areas or vulnerable to more intense uses.<sup>7</sup>

Clark County designated the area proposed for the Ridgefield UGA expansion as agricultural lands of long-term commercial significance.<sup>8</sup> In designating the land, Clark County followed a reasoned process and considered the GMA’s mandate and goals and requirements, and found that these lands must be conserved.<sup>9</sup> As this letter will show, that earlier decision was correct and the land still meets the GMA and Clark County criteria for agricultural land of long-term commercial significance.

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<sup>4</sup> *Bremerton v. Kitsap County*, CPSGMHB No. 95-3-0039, Final Decision and Order (Oct. 6, 1995), at 28.

<sup>5</sup> *City of Redmond v. Central Puget Sound Growth Management Hearings Bd.*, 138 Wn.2d 38, 47, 14 P.3d 133 (1998), quoting Richard L. Settle & Charles G. Gavigan, *The Growth Management Revolution in Washington: Past, Present, and Future*, 16 *U. Puget Sound L. Rev.* 867, 907 (1993).

<sup>6</sup> RCW 36.70A.060.

<sup>7</sup> *Lewis County v. Western Washington Growth Management Hearings Bd.*, 157 Wn.2d 488, 502, 139 P.3d 1096, 1103 (2006).

<sup>8</sup> See the *County/UGA Comprehensive Plan Clark County, Washington* excerpt on page 3 of this letter.

<sup>9</sup> *Clark County 20-Year Comprehensive Growth Management Plan 2004-2024* Chapter 3 Rural and Natural Resource Element pp. 3-7 – 3-8 (Dec. 2012) accessed on Sept. 16, 2015 at: [http://www.clark.wa.gov/Planning/comp\\_plan/documents/WebVersion\\_AmORD2012-12-20.pdf](http://www.clark.wa.gov/Planning/comp_plan/documents/WebVersion_AmORD2012-12-20.pdf)



***The area within the Ridgefield UGA expansion is not “characterized by urban growth”***

The first of the Lewis County criteria are that the agricultural land is not already characterized by urban growth.<sup>10</sup> None of the 111 acres are characterized by urban growth.<sup>11</sup> And except for a few small lots, neither are any of the adjoining lots in Ridgefield or any of the nearby agricultural and rural lots.<sup>12</sup>

***The land is primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2)***

The second *Lewis County* factor is that “agricultural land is land: ... that is primarily devoted to the commercial production of agricultural products enumerated in RCW 36.70A.030(2), including land in areas used or capable of being used for production based on land characteristics ....”<sup>13</sup> The agricultural products enumerated in RCW 36.70A.030(2) are “horticultural, viticultural, floricultural, dairy, apiary, vegetable, or animal products or ... berries, grain, hay, straw, turf, seed, Christmas trees not subject to the excise tax imposed by \*RCW 84.33.100 through 84.33.140, finfish in upland hatcheries, or livestock ....”

The area in which the Ridgefield UGA expansion is located is both used and capable of being used for agriculture. The Clark County MapsOnline 2014 aerial image, enclosed with the paper original of this letter, shows that the 111 acres and many of the properties in the vicinity are currently farmed. In addition, as Table 1 enclosed with this letter documents, the 111 acres are in the agriculture current use taxation program, so they property is used for agriculture.<sup>14</sup> The Clark County Food System Council has identified all or nearly all of the 111 acres and much of the land in its

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<sup>10</sup> *Lewis County v. Western Washington Growth Management Hearings Bd.*, 157 Wn.2d 488, 502, 139 P.3d 1096, 1103 (2006).

<sup>11</sup> Clark County MapsOnline Property and Land Records Information 2014 aerial image and map showing tax lots and building footprints enclosed with the paper original of this letter, and the Aerials Showing Parcel, the Clark County Property Information Account Summary, and the Clark County Property Information Land & Building Details for properties 213065000, 213066000, 213067000, 213068000, 213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of this letter in Appendix A.

<sup>12</sup> Clark County MapsOnline Property and Land Records Information 2014 aerial image and map showing tax lots and building footprints enclosed with the paper original of this letter, and the “Aerials Showing Parcel,” the Clark County Property Information Account Summary, and the Clark County Property Information Land & Building Details enclosed in the data CD included with the paper original of this letter in Appendix B.

<sup>13</sup> *Lewis County*, 157 Wn.2d at 502, 139 P.3d at 1103.

<sup>14</sup> See also the Clark County Property Information Account Summaries for properties 213065000, 213066000, 213067000, 213068000, 213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of this letter in Appendix A.



vicinity as “Clark County’s Best Farm Land.”<sup>15</sup> The Clark County Food System Council identified this land “by looking at characteristics of the land that make it suitable for food production.”<sup>16</sup> These included soils with land capability 1 through 4 soils, land that is flat and rolling, lands that have at least four acres outside the buffers around stream habitats, and “lands that are currently zoned for agriculture or rural residences. ... [They] excluded lands that are tax exempt because they are owned by churches, land trusts, or governments.”<sup>17</sup>

*The land has long-term commercial significance*

The third *Lewis County* factor is that “agricultural land is land: ... (c) that has long-term commercial significance for agricultural production, as indicated by soil, growing capacity, productivity, and whether it is near population areas or vulnerable to more intense uses.”<sup>18</sup> As Table 2 enclosed with this letter documents, over 91 percent of the expansion area has Land Capability 1 through 4 soils. These are agriculturally productive soils.<sup>19</sup> Most of the nearby lands also have these high quality agricultural soils.<sup>20</sup>

In addition, Table 2 also documents that 69 percent of the UGA expansion has prime farmland. Another 11 percent has farmland of statewide importance soils.

Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops, and is also available for these uses (the land could be cropland, pastureland, rangeland, forest land, or other land, but not urban built-up land or water). It has the soil quality, growing season, and moisture supply needed to economically produce sustained high yields of crops when treated and managed, including water management, according to acceptable farming methods. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not excessively erodible or saturated with water for a long period of

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<sup>15</sup> *Promoting Agricultural Food Production in Clark County*, A proposal developed by the Clark County Food System Council p. 4 (November 2013) enclosed with the paper original of this letter.

<sup>16</sup> *Id.* p. 5.

<sup>17</sup> *Id.*

<sup>18</sup> *Lewis County*, 157 Wn.2d at 502, 139 P.3d at 1103.

<sup>19</sup> USDA Natural Resources Conservation Service Minnesota, *Land Capability Classes* webpage p. 1 accessed on Sept. 16, 2015 at:

[http://www.nrcs.usda.gov/wps/portal/nrcs/detail/mn/technical/dma/nri/?cid=nrcs142p2\\_023556](http://www.nrcs.usda.gov/wps/portal/nrcs/detail/mn/technical/dma/nri/?cid=nrcs142p2_023556) and enclosed with the paper original of this letter.

<sup>20</sup> *Promoting Agricultural Food Production in Clark County*, A proposal developed by the Clark County Food System Council pp. 4 – 5 (November 2013).

time, and they either do not flood frequently or are protected from flooding.<sup>21</sup>

The productivity of these soils is confirmed by the *Clark County Comprehensive Plan 2004-2024* which states:

The maps were used [in the 1990s] to identify Clark County's most productive farmland. This process identified farm areas that included major patterns of high quality soils and agricultural activity in areas with generally larger parcels.<sup>22</sup>

So the soils, growing capacity, and productivity show this area has long-term commercial significance. According to data we obtained from the Clark County Clark County "Building Permit History" webpages, there have not been any urban development permits in the vicinity of the proposed UGA expansion including adjacent parcels in Ridgefield.<sup>23</sup> So this areas are not near population areas and are not vulnerable to more intense uses, especially if the area retains its protective Agriculture designation and zoning. Since this land qualifies to be designated as agricultural lands of long-term commercial significance, Clark County is "required to assure the conservation of agricultural lands and to assure that the use of adjacent lands does not interfere with their continued use for the production of food or agricultural products."<sup>24</sup> And the *Clark County Buildable Lands Report* documents that Ridgefield has no need to expand its UGA to accommodate residential growth.<sup>25</sup> So under the statutory factors in RCW 36.70A.030(10) this area has long-term commercial significance.

Clark County also considered the following factors in designated agricultural lands.<sup>26</sup> Those factors show the land in the UGA expansion still qualifies as agricultural lands of long-term commercial significance.

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<sup>21</sup> 7 CFR § 657.5(a)(1).

<sup>22</sup> *Clark County 20-Year Comprehensive Growth Management Plan 2004-2024* Chapter 3 Rural and Natural Resource Element p. 3-8 (Dec. 2012).

<sup>23</sup> "Building Permit History" webpages in Appendices A and B enclosed on the data CD included with the paper original of this letter. See also the Clark County MapsOnline Property and Land Records Information 2014 aerial image and map showing tax lots and building footprints enclosed with the paper original of this letter.

<sup>24</sup> *Soccer Fields*, 142 Wn.2d at 556, 14 P.3d at 140 emphasis in original.

<sup>25</sup> *Clark County Buildable Lands Report* pp. 9 – 10 (June 2015) accessed on Sept. 14, 2015 at: [http://www.clark.wa.gov/thegrid/documents/061015WS\\_2015BUILDABLE\\_LANDS\\_REPORT.pdf](http://www.clark.wa.gov/thegrid/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf) and enclosed with the paper original of this letter.

<sup>26</sup> *Clark County 20-Year Comprehensive Growth Management Plan 2004-2024* Chapter 3 Rural and Natural Resource Element p. 3-7 (Dec. 2012).

*“The availability of public facilities”*

The City of Ridgefield does not have water or sewer facilities to serve any of the UGA expansion or its vicinity.<sup>27</sup> There is no evidence of any other urban public facilities serving the UGA expansion area.<sup>28</sup> So this criterion shows the area has long-term commercial significance for agriculture.

*“Tax status”*

All of the land in the UGA expansion and many neighboring parcels are in the agriculture current use taxation program.<sup>29</sup> So this criterion shows the area has long-term commercial significance for agriculture.

*“The availability of public services”*

No urban supporting public services were identified in the urban growth area expansion or vicinity.<sup>30</sup> So this criterion shows the area has long-term commercial significance for agriculture.

*“Relationship or proximity to urban growth areas”*

While the UGA expansion abuts Ridgefield and the UGA, it is currently outside of the UGA and designated as agricultural lands of long-term commercial significance. There is currently no urban development on the UGA expansion or immediately south in Ridgefield.<sup>31</sup> As was documented above, there are no urban serving public facilities or services available to the UGA expansion. *Clark County Buildable Lands Report* shows

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<sup>27</sup> *City of Ridgefield Clark County, Washington General Sewer Plan Volume 1* Figures 2-1 and 2-11 (March 2013) accessed on Sept. 16, 2015 at: <http://www.crwwd.com/documents/RidgefieldGeneralSewerPlan2013.pdf> and cited pages enclosed with the paper original of this letter.

<sup>28</sup> Clark County Property Information Account Summary for properties 213065000, 213066000, 213067000, 213068000, 213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of this letter in Appendix A.

<sup>29</sup> Table 1 Summary Property Data for Properties in the Ridgefield Urban Growth Area Expansion enclosed and the Account Summary webpages for parcels 213798000, 212813000, 212812000, 212778000, 212777000, 212799000, 213033000, 213083000, 213028000, and 213018000 enclosed in the data CD included with the paper original of this letter in Appendix B.

<sup>30</sup> *City of Ridgefield Clark County, Washington General Sewer Plan Volume 1* Figures 2-1 and 2-11 (March 2013); Clark County Property Information Account Summary for properties 213065000, 213066000, 213067000, 213068000, 213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of this letter in Appendix A.

<sup>31</sup> Google Earth April 17, 2015 image of the UGA expansion vicinity enclosed with the paper original of this letter and on the data CD enclosed with this letter; Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints enclosed with the paper original of this letter.

there is no need to expand the Ridgefield UGA.<sup>32</sup> So this area does not have a relationship with the UGA that indicates it needs to be included. So this criterion indicates that the land has long-term commercial significance for agriculture.

*“Predominant parcel size”*

While Table 1 documents that the UGA expansion has lots ranging from just over five to 14 acres, the owners are related companies and the land is managed as a single unit. This can be seen in the aerial images where the plowing and fields cross property lines.<sup>33</sup> Farms are often composed of multiple parcels of land.<sup>34</sup> So the 111 acres is larger than Clark County’s average farm size of 39 acres.<sup>35</sup> So this criterion indicates that the land has long-term commercial significance for agriculture.

*“Land use settlement patterns and their compatibility with agricultural practices”*

As was documented above, the uses near the proposed UGA expansion, including land in Ridgefield, consist of agriculture and rural uses.<sup>36</sup> So the land settlement patterns are generally compatible with agriculture and the area has long-term commercial significance for agriculture.

*“Intensity of nearby land uses”*

Again, the uses near the proposed UGA expansion, including land in Ridgefield, consist of agriculture and rural type uses.<sup>37</sup> So the intensity of nearby land uses are generally compatible with agriculture and the area has long-term commercial significance for agriculture.

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<sup>32</sup> Clark County Buildable Lands Report pp. 9 – 10 (June 2015).

<sup>33</sup> Clark County MapsOnline Property and Land Records Information 2014 aerial image.

<sup>34</sup> United States Department of Agriculture, National Agricultural Statistics Service, *2012 Census of Agriculture Washington State and County Data Volume 1* • Geographic Area Series • Part 47 AC-12-A-47 p. B-13 (May 2014) accessed on Sept. 16, 2015 at: [http://www.agcensus.usda.gov/Publications/2012/Full\\_Report/Volume\\_1\\_Chapter\\_2\\_County\\_Level/Washington/wav1.pdf](http://www.agcensus.usda.gov/Publications/2012/Full_Report/Volume_1_Chapter_2_County_Level/Washington/wav1.pdf). A copy of *2012 Census of Agriculture Washington State and County Data Volume 1* was enclosed with the paper original of Futurewise’s Sept. 10, 2015 letter.

<sup>35</sup> United States Department of Agriculture, National Agricultural Statistics Service, *2012 Census of Agriculture Washington State and County Data Volume 1* • Geographic Area Series • Part 47 AC-12-A-47 Chapter 2: County Level Data, Table 8. Farms, Land in Farms, Value of Land and Buildings, and Land Use: 2012 and 2007 p. 271 (May 2014).

<sup>36</sup> Google Earth April 17, 2015 image of the UGA expansion vicinity; Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints.

<sup>37</sup> Google Earth April 17, 2015 image of the UGA expansion vicinity; Clark County MapsOnline Property and Land Records Information map showing tax lots and building footprints.

*“History of land development permits issued nearby”*

According to data we obtained from the Clark County Clark County “Building Permit History” webpages, there have not been any urban development permits in the vicinity including adjacent parcels in Ridgefield.<sup>38</sup> So this criterion indicates the area has long-term commercial significance for agriculture.

*“Land values under alternative uses”*

The Washington State Supreme Court has noted that uses other than agriculture will always be more profitable and this alone does not justify the loss of natural resource land.<sup>39</sup> In the present case, there are numerous parcels that could be included in the Ridgefield UGA without converting the agricultural land. The excerpt from the comprehensive plan map on page 3 of this letter shows rural land abutting the Ridgefield UGA. In addition, there is no need to expand the Ridgefield UGA for residential development.<sup>40</sup> So land prices should not be the steering factor in the UGA expansion decision.

*“Proximity to markets”*

This area is close to Ridgefield and has good access to I-5.<sup>41</sup> There are roads in the area that can bring agricultural products to market. The Globalwise, Inc. *Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington Preliminary Report* shows that local farmers do sell their products at local markets.<sup>42</sup> The two major poultry processors are in Western Washington,<sup>43</sup> so this area has good access to them. The area’s and the county’s good access to I-5 also provides good access to regional livestock markets.<sup>44</sup> So this criterion shows the area has long-term commercial significance.

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<sup>38</sup> “Building Permit History” webpages in Appendices A and B enclosed on the data CD included with the paper original of this letter. See also the Clark County MapsOnline Property and Land Records Information 2014 aerial image and map showing tax lots and building footprints enclosed with the paper original of this letter.

<sup>39</sup> *City of Redmond*, 136 Wn.2d at 52 – 53, 959 P.2d at 1097.

<sup>40</sup> *Clark County Buildable Lands Report* pp. 9 – 10 (June 2015).

<sup>41</sup> Google Earth April 17, 2015 image of the UGA expansion vicinity.

<sup>42</sup> Globalwise, Inc., *Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington Preliminary Report* p. 27 (Prepared for Clark County, Washington: April 16, 2007) accessed on Sept. 16, 2015 at: [http://www.clark.wa.gov/planning/comp\\_plan/documents/final\\_ag\\_analysis\\_prelim\\_report.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/final_ag_analysis_prelim_report.pdf) and cited pages enclosed with the paper original of this letter..

<sup>43</sup> *Id.* at p. 24.

<sup>44</sup> Stephanie Meenach, Eric L. Jessup, and Kenneth L. Casavant, *Transportation and Marketing Needs for the Washington State Livestock Industry SFTA Research Report #12* p. 5 (Washington State University School of Economic Sciences: Nov. 2004) accessed on Sept. 16, 2015 at: [http://www.sfta.wsu.edu/research/reports/pdf/rpt\\_12\\_livestock.pdf](http://www.sfta.wsu.edu/research/reports/pdf/rpt_12_livestock.pdf) and enclosed with the paper original of this letter.



In sum, all but one of the Clark County Comprehensive Plan factors, land values under alternative uses, show that this area has long-term commercial significance for agriculture. And the Washington State Supreme Court has concluded that land values under alternative uses should not be the deciding factor. The subareas also meet the statutory factors. So dedesignating this area would violate the Growth Management Act and the Clark County Comprehensive Plan.

### **Ridgefield urban growth area (UGA) is currently oversized and so the expansion violates the GMA limits on UGA sizes**

The Washington State Supreme Court has held that an “UGA designation cannot exceed the amount of land necessary to accommodate the urban growth projected by the Washington State Office of Financial Management (OFM), plus a reasonable land market supply factor.”<sup>45</sup> According to the *Clark County Buildable Lands Report*, the Ridgefield urban growth area (UGA) already has more land than needed to accommodate its 20-year population projection.<sup>46</sup> So expanding the Ridgefield UGA violates the GMA.

### **Conclusion**

As we have seen, the proposed Ridgefield UGA expansion violates the GMA in three different and independent ways. The Final SEIS should summarize the evidence included with this letter and state that the Ridgefield UGA expansion contains the three GMA violations.

Some may argue that the paving over of 111 acres of valuable farmland is not a big loss. But the Washington State Department of Agriculture’s *Washington Agriculture Strategic Plan 2020 and Beyond* documents the need to conserve existing agricultural lands to maintain the agricultural industry and the jobs and incomes the industry provides.<sup>47</sup> As the strategic plan concludes “[t]he future of farming in Washington is heavily dependent on agriculture’s ability to maintain the land resource that is currently available to it.”<sup>48</sup>

Thank you for considering our comments. If you require additional information please contact me at telephone 206-343-0681 Ext. 118 and email [tim@futurewise.org](mailto:tim@futurewise.org)

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<sup>45</sup> *Thurston County v. Western Washington Growth Management Hearings Bd.*, 164 Wn.2d 329, 351 – 52, 190 P.3d 38, 48 – 49 (2008). See also RCW 36.70A.110 and RCW 36.70A.115 which limit the size of UGAs.

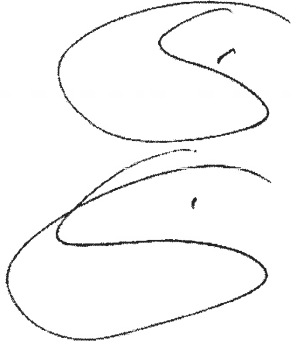
<sup>46</sup> *Clark County Buildable Lands Report* pp. 9 – 10 (June 2015) accessed on Sept. 14, 2015 at: [http://www.clark.wa.gov/thegrid/documents/061015WS\\_2015BUILDABLE\\_LANDS\\_REPORT.pdf](http://www.clark.wa.gov/thegrid/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf) and enclosed with the paper original of this letter.

<sup>47</sup> Washington State Department of Agriculture, *Washington Agriculture Strategic Plan 2020 and Beyond* pp. 50 – 52 (2009) accessed on Sept. 10, 2015 at: <http://agr.wa.gov/fofi/> and cited excerpts enclosed with the paper original of Futurewise’s Sept. 10, 2015 letter commenting on the Draft SEIS.

<sup>48</sup> *Id.* at p. 50.

Attn: 2016 Comp Plan Record Comments on SEIS  
September 16, 2015  
Page 12

Very Truly Yours,

A handwritten signature in black ink, consisting of two large, stylized, overlapping loops that resemble the letter 'S'.

Tim Trohimovich, AICP  
Director of Planning & Law

Enclosures

**Table 1 Summary Property Data for Properties in the Ridgefield Urban Growth Area Expansion**

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Parcel Size (Acres)
213065000	RDGB ROYAL FARMS LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/24/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.09
213066000	RDGK REST VIEW ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	10/06/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.24
213067000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.35
213068000	RDGB ROYAL FARMS LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/24/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.15
213069000	RDGK REST VIEW ESTATES LLC 8320 NE HIGHWAY 99	10/06/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.05



Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Parcel Size (Acres)
213070000	VANCOUVER WA, 98665 US RDGF RIVER VIEW ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	12/05/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.02
213071000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None other than a determination of whether Tax Lots 79 and 87 are separate lots of record.	6.07
213072000	RDGB ROYAL FARMS LLC C/O ADMINISTRATIVE OFFICE 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/24/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	6
213073000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	6.54

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Parcel Size (Acres)
213074000	RDGF RIVER VIEW ESTATES LLC, 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	12/05/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	6.02
213075000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5
213076000	RDGK REST VIEW ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	10/06/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5
213077000	RDGM RAWHIDE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	House, barn, and outbuildings.	None	13.83
213078000	RDGS REAL VIEW LLC 8320 NE HIGHWAY 99	11/08/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.87

Property Identification Number	Owner & Mailing Address	Sale Date	In Agricultural Current Use Taxation Program	Buildings	Permits	Parcel Size (Acres)
	VANCOUVER WA, 98665 US		Agricultural Land			
213079000	RDGK REST VIEW ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	10/06/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None other than a determination of whether Tax Lots 79 and 87 are separate lots of record.	6.87
213080000	RDGS REAL VIEW LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/08/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.16
213081000	RDGS REAL VIEW LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	11/08/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.16
213082000	RDGM RA WHITE ESTATES LLC 8320 NE HIGHWAY 99 VANCOUVER WA, 98665 US	09/30/2005	Yes. The Land is valued as Farm and Agricultural Land	None	None	5.17
<b>Total Acreage</b>						<b>107.59</b>

Sources: Clark County Property Information Account Summary, Clark County Property Information Land & Building Details, and Clark County Property Information Building Permit History for properties 213065000, 213066000, 213067000, 213068000,

213069000, 213070000, 213071000, 213072000, 213073000, 213074000, 213075000, 213076000, 213077000, 213078000, 213079000, 213080000, 213081000, 213082000 enclosed in the data CD included with the paper original of Futurewise's Sept. 16, 2015 letter in Appendix A.

For Parcels 213079000 and 213071000, Clark County Development Review Decision and Abbreviated Staff Report Date: March 9, 2005, Case Number: MZR2005-00021 Lot Determination enclosed in the data CD included with the paper original of Futurewise's Sept. 16, 2015 letter Appendix A.

**Table 2 Soils Types in the Ridgefield UGA Expansion and Land Capability and Prime Farmland Status**

<b>Map Unit Symbol</b>	<b>Map Unit Name</b>	<b>Acres in Area</b>	<b>Percent of Area</b>	<b>Land Capability</b>	<b>Prime Farmland</b>
GeB	Gee silt loam, 0 to 8 percent slopes	70.3	62.6%		3w Prime Farmland
GeD	Gee silt loam, 8 to 20 percent slopes	12.1	10.8%		3e Farmland of statewide importance
GeE	Gee silt loam, 20 to 30 percent slopes	12.8	11.4%		4e
HoA	Hillsboro silt loam, 0 to 3 percent slopes	0.2	0.2%		1 Prime Farmland
HoE	Hillsboro silt loam, 20 to 30 percent slopes	0.3	0.3%		4e
OdB	Odne silt loam, 0 to 5 percent slopes	8.8	7.9%		6w
SIF	Sara silt loam, 30 to 50 percent slopes	0.1	0.1%		7e
W	Water	1.1	1.0%		2e
WgB	Washougal gravelly loam, 0 to 8 percent slopes	6.5	5.8%		Prime Farmland
	<b>Totals</b>	<b>112.2</b>	<b>100.1%</b>		

Percent Land Capability 1 through 4 Soils: 91.1%

Percent Prime Farmland Soils: 68.6%

Sources: United States Department of Agriculture Natural Resources Conservation Service, Web Soil Survey map and map unit descriptions both enclosed with the paper original of this letter.

## Schroader, Kathy

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**From:** Michele Wollert <michelewollert@gmail.com>  
**Sent:** Wednesday, September 16, 2015 7:31 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** GMA Comp Plan Update comments

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Councilors Stewart, Mielke, and Madore:

I join Slow Food Southwest Washington in expressing my concerns about the impact of Alt2 and Alt4 in your GMA Update. Both options parcelize the rural landscape with broad strokes that do not consider the impacts to current or future economically viable farms.

Especially alarming is how Alt. 2 and Alt. 4 eliminates, in one broad sweep, the current AG 20 zoning replacing it with AG-5 and AG-10 and creating smaller lots of 1, 2.5 and 5 acres lots in the rural area. Large acreage zoning can protect farmland for the long term when the parcel size is 20 acres or greater.

*American Farmland Trust fact sheet on zoning as a means of protecting agricultural land explains – ... “ordinances that allow construction of houses on lots of 1-5 acres often hasten the decline of agriculture by allowing residences to consume far more land than necessary.”*

Below are listed five citizen led reports on conserving agriculture in Clark County that should provide direct guidance on the Board of Clark County Councilors direction for protecting agricultural resource land as mandated by the Growth Management Act. One of many common recommendations is to create Agricultural Production Districts that cluster large acreage farms.

Alt 2 and Alt 4 fuel the speed of fragmenting agricultural land and increasing rural residential parcels reduces the amount of land available for farming and will threaten local food security. It will undermine our agricultural heritage and weaken the economic viability of farming in Clark County.

Why large acreage farms are important for long term retention of local agriculture:

- The per acre cost of farmland goes up with smaller acreages – contrary to what some may think the per acre cost more than doubles when you go from a 20 acre parcel to a 10 acre parcel and even higher with 5, 2.5 and 1 acre parcels where you can be looking at a 10 fold increase in the per acre cost. Alt. 2 and 4 would make land for farming prohibitively expensive for economically viable farms.
- Large blocks of land dedicated to farming provide more long term stability and resilience for agriculture. You can plant an orchard - a 50 plus year investment with some predictability that you won't lose your investment.
- Large block farming can support necessary agricultural infrastructure – shared storage, equipment, processing, marketing etc. There is an important economic cluster of supporting jobs that occurs with larger scale farming.

- Dry land farming is feasible in Clark County but it requires larger acreage to be economically feasible with a more limited variety of crops. As new water rights are not available it behooves us to preserve the remaining large acreage farms for diversity of crops and the future resiliency of food production in the county.

#### Population Assumptions Don't Support Alt. 2 and Alt. 4

- Total population growth was revised downward by nearly 7,000 from the previous Comprehensive Plan of 2007.
- Development occurs disproportionately in the rural areas. Contrary to the planning assumption of a 90% urban/10% rural population split – Alt 2 and Alt 4 would allow 16% and 24% of the growth to occur in the rural areas respectively.

#### Sprawling Effect of Alt. 2 & 4 = Inefficient Use of Resources

- Water Resources – new rural lots would require additional wells and septic systems. Experiencing one of the driest summers on record it is short-sighted indeed to be cavalier in proposing to encourage additional 8,220 to 12,400 new wells to tap into the Troutdale aquifer that supplies drinking water to 95% of the population in Clark County.
- Our current transportation system would not support the needed roads to accommodate the growth that would occur across the rural portions of Clark County.
- 34,000 acres would be impacted under Alt. 2 and 65,000 acres impacted under Alt. 4 – impacts would be cumulative to surface and ground water and fish and wildlife resources.

#### What the Draft Supplemental Environmental Impact Statement Says About Alt 2 & Alt 4

- Will require new roads, greater maintenance, longer commutes, and consume more energy.
- New parcels will be spread all over the county.
- Diminishes the county's ability to attract large scale agriculture.
- Creates more housing than is needed.
- **Would not support state regulations to control sprawl.**
- New transportation facilities and maintenance would fall to the county with the cost only partially recovered through impact fees.
- EIS concludes that the cost for Alt 2 and 4 would be prohibitive.
- Needed infrastructure – power lines, schools, support services would change the character of rural Clark County.

**Alt. 2 and Alt. 4 are costly alternatives that reduce the long term future of agriculture in our community and should be rejected out of hand.**

These citizen led reports on conserving agriculture in Clark County should provide guidance on the Board of Clark County Councilors direction for protecting agricultural resource land as mandated by the Growth Management Act:

**Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington April 2007**

[http://www.clark.wa.gov/planning/comp\\_plan/documents/final\\_ag\\_analysis\\_prelim\\_report.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/final_ag_analysis_prelim_report.pdf)

**Clark County Agriculture Preservation Strategies Report March 2009**

<http://www.clark.wa.gov/planning/RuralLands/documents/2009%20APAC%20AgPreservationStrategiesReport.pdf>

**Rural Lands Task Force Recommendations March 2010**

[http://www.clark.wa.gov/planning/rurallands/documents/10-0310\\_RLTF-RecommendationsReport.pdf](http://www.clark.wa.gov/planning/rurallands/documents/10-0310_RLTF-RecommendationsReport.pdf)

**Promoting Agricultural Food Production in Clark County, NOV 2013**

<http://www.clark.wa.gov/public-health/about/documents/FSCProposalDraft.pdf>

I urge you to reject Alternative 2 and 4.

Thank you for considering our vulnerable family farms.

Michele Wollert  
Vancouver WA



**Schroader, Kathy**

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Wednesday, September 16, 2015 8:44 PM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: comprehensive plan

Comments:

I vote for little or no change to our comprehensive plan at this time.

Submitted by:

Janice Zastoupil

Email: [bjzasty@yahoo.com](mailto:bjzasty@yahoo.com)

Address:

12712 n.e. Laurin rd.

Vancouver, Wa

**Schroader, Kathy**

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Thursday, September 17, 2015 12:30 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Comp Plan Comment

Comments:

I am in favor of Option 1, no changes on the Comprehensive Growth Update. It looks like it will have the least negative impact on local lands and resources; it still allows enough buildable lots to accommodate the expected growth; and it maintains larger rural lot sizes, which will be more beneficial to farming and forestry. Locally sourced farm goods is a growing industry in the county, and may be critical in the future. Please recommend Option 1.

Submitted by:  
Carrie Parks

Email: [carparks@comcast.net](mailto:carparks@comcast.net)

Address:

Vancouver, WA

**Schroader, Kathy**

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Thursday, September 17, 2015 7:23 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Comp Plan

Comments:  
I favor comp Plan 3 or 1

Submitted by:  
Phyllis Likness

Email: [likness000@comcast.net](mailto:likness000@comcast.net)

Address:

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**Schroader, Kathy**

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Thursday, September 17, 2015 7:38 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Land Use Plans

Comments:

My husband and I urge the adoption of Alternative One. It is necessary to maintain land for agriculture and wildlife habitat, and to preserve land for future generations. Already, where we live in north Clark County, there are issues with wells and the availability of water, which would only increase exponentially with development. Please walk away from greedy self-interests and maintain rural Clark County the way it is.

Submitted by:

Carla Kelly

Email: [cmyk@frontier.com](mailto:cmyk@frontier.com)

Address:

7603 NE Cedar Creek Rd  
Woodland, WASHINGTON

**Schroader, Kathy**

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**From:** Lynn Carman <lynn.carman@comcast.net>  
**Sent:** Thursday, September 17, 2015 8:26 AM  
**To:** Cnty 2016 Comp Plan; Cnty Board of County Councilors General Delivery; Madore, David; Mielke, Tom; Stewart, Jeanne  
**Cc:** Orjiako, Oliver; western@elaho.wa.gov  
**Subject:** Growth Management Act Comments / deadline 9/17/2015 - 4:00 PM

Lynn Carman  
11104 NW 33 Avenue  
Felida, WA 98685  
9/17/2015

Board of Clark County Councilors  
1300 Franklin Street  
Vancouver, WA 98666

RE: Growth Management Act 2015 Comments

Clark County attempt at GMA for this year's go around is nothing short of a joke. Folks pushing agendas that will doesn't do what is in the best interest of all citizens of Clark County but will cost us all dearly. From the start it's been micro managed by the Clark County Councilors and deadline dates violated, by passing of the Clark County Commissioners on some parts and a total joke as to whom was going to follow the rules. Then there are those that are pushing their own agendas. Those that don't comply with the zoning pushing their agenda to do what? Their land doesn't comply why? Did they not do their research prior to buying their land? When does Clark County Coddle to folks like this?? Shouldn't they have gone to the

Clark County Planning Commission to change their status? But again there is the appearance that the Clark County Councilors have no clue as to what their real jobs are or abide by their oath and the Wa State laws passed down by the State of WA.

I again do not feel my County is doing what is in the best interest of all citizens. They have violated so many laws it's not funny anymore. They just don't care what they do, from stormwater runoff to allowing builder to do what they want and I can't get over how things are written off of not followed and then it becomes the tax payers whom foot the bill when the inspections are not done right. To name a few items, the county's own road project on NW 43 rd Avenue stormwater is being run into a privately own stormwater system of Ashley Heights in which the County was told by the DOE would be a problem during their SEPA process. This is against the law. Then we have development agreements that were filed with the courts that they have violated in the same area and used state transportation money and never follow through. There is also the fact that other developments have gone forward in the same area that were denied due to fact there is only one roadway and it's been failing for years. The county knew about this and a county engineer designed a roadway for a developer that would of failed but the county still wants to push this forward and now would have to take out homes and can't do

do due to the roadway now is privately owned. This roadway has been proven to fail and be dangerous if put in. Then lets talk about the Lakeshore Ave

mess where we see another developer putting in a curbing that will not allow for widening without taking up what is there prior to the construction of the project.

There is no turn lane which causes back up already prior to it being built, this developer knew of the problem before he started putting in his numerous

lot development with commercial. I just love how some developers have to jump through hoops and some slide by and allow the taxpayers to foot the mistakes

they make. So if this is allowed in my area, what are they doing all over Clark County? Stormwater designed for one project will fail also when the County allows

for French drains to be put in without a permit to drain a property for it to be used. The list is long but here are examples of concerns.

As for the GMA alternatives that have been proposed, sorry but it's not accounting for the rapid growth that the county has allowed with the density that we all share,

we have seen this with the roadway failures in which the county will just go to the state and open their hands when they should do better in management of their open

the barn door policy when it comes to growth. They can't support the standards needed for emergency services or enforcement. Parks are not a need but something

they have allowed to take on a life due to the density of lots and no place for kids to play. It is really a sad state of affairs here. Crimes that are not being addressed and

rapid growth that isn't paying for itself. Standards have really dropped and there is the appearance no one cares, from the citizens that break the law due to they know no one is out there watching and the County doesn't care.

The GMA alternatives are agendas of a few and doesn't solve the areas' needs. When is this County really going to take a look at all these years of neglect, GMA's density problems and use of major roadways not a grid system of design so that traffic will flow. Then there is the safety issues of some roadway while they build others that well the design is the problem? Wake of WA State, you will see Clark County with their hands in your pocket due to they are not good stewards of the land here and continue to allow for development to go in and roadways failing faster than one wants to know. Why so they can allow rapid growth so they can be powerful? It's a joke down here and the lack of abiding by the WA State laws is priceless. One Councilor made the statement, "Roadways just happen." They fail faster than the happen. Love how NE 119<sup>th</sup> Street is being built up due to the land grab there by the county, an agenda by a couple councilors in their so called need for industrial land when there is plenty of industrial land still on the books to be built upon. This land should still be farmed and grow food for our area. I just shake my head at what I have seen this past year, the county isn't controlling growth it's allowing sprawl and it will cost the area residents dearly.

When is Clark County going to have real look at GMA as the WA State proposed it to be. When is Clark County going to abide by the WA State RCW? It really makes me dis appointed



in the leadership here with their hands extended due to their poor choices.

Sincerely,  
Lynn Carman

## Schroader, Kathy

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**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 9:00 AM  
**To:** Euler, Gordon; Alvarez, Jose; Anderson, Colete; Albrecht, Gary; Kamp, Jacqueline; Lumbantobing, Sharon; Laurie Lebowsky (laurie.lebowsky@gmail.com); Hermen, Matt; Schroader, Kathy  
**Cc:** Schroader, Kathy; Wisner, Sonja  
**Subject:** FW: FOCC Supplemental Comments DSEIS and CP Update  
**Attachments:** FOCC-CFP Comments-150917.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

All:

FYI, and for the index, PC and BOCC. Thanks.

Oliver

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**From:** David McDonald [<mailto:david@mcdonaldpc.com>]  
**Sent:** Thursday, September 17, 2015 7:39 AM  
**To:** Orjiako, Oliver  
**Subject:** FOCC Supplemental Comments DSEIS and CP Update

Mr. Orjiako:

Please find attached some further comments from FOCC regarding the DSEIS and the Comp Plan update. Please make them a part of the record for both the DSEIS and CP update. Please let me know if I should make hard copies available for the the decision makers.

Thank you for your attention to this matter.

Best Regards,

David

David T. McDonald  
David T. McDonald, P.C.  
Courtroom Lawyer  
Suite 625  
833 SW 11th  
Portland, Oregon 97205  
503-226-0188 (o)  
503-226-1136 (f)  
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State and Federal Courts

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FRIENDS OF CLARK COUNTY  
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VANCOUVER, WASHINGTON 98666  
[friendsofclarkcounty@tds.net](mailto:friendsofclarkcounty@tds.net)

Board of County Councilors  
Planning Commission Members  
% Mr. Oliver Orjiako, Director  
Clark County Community Planning  
1300 Franklin Street  
3<sup>rd</sup> Floor  
Vancouver, Washington 98660

Via pdf and e-mail to [Oliver.Orjiako@clark.wa.gov](mailto:Oliver.Orjiako@clark.wa.gov)

Mr. Orjiako:

Please accept these comments on the DSEIS and Comprehensive Plan update for the record on behalf of FOCC. We continue to review the record and believe that the following are important points for the consideration of the decision makers and also for the record.

The DSEIS consistently emphasizes that Alternative #4, much more than any other alternative, will have the most significant adverse impacts. Unfortunately, the SDEIS fails to identify those significant impacts in more than general terms and, thus, makes it inadequate for the general public to evaluate. The DSEIS does contain emphasize several points that FOCC believes are important to reiterate.

First, Cumulative impacts would include an increased number of water wells, which in turn increase the potential for groundwater contamination and reduction of water supply, increases in impervious surface that contribute to stormwater runoff, and vegetation clearing that considerably degrade the quality of streams and other surface waters.”.

Second, it is clear that many regulations may have good intent behind them but they cannot prevent the cumulative loss of habitat and habitat functions. Specifically, the DSEIS states: "However, even when projects comply with regulations and provide mitigation, there may be a cumulative loss of habitat functions at a larger scale; for example, through fragmentation of habitat by development of new structures and roads."

Third, FOCC is concerned regarding the affordability of the current Alternatives. The DSEIS suggests, but does not quantify, that any of the Alternatives are economically sustainable. There is even greater concern that the current Capital Facilities plan is not meeting concurrency requirements after listening to Board time on

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% Mr. Oliver Orjiako, Director  
Clark County Community Planning  
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the TIP/TIL program with Ms. Wilson provided information to the Board.

FOCC is not aware of any evidence in the record that the goals and projects of the Capital Facilities Plan from the 2004 and 2007 Comprehensive Plans have been adequately funded, much less have been completed. If those projects have not been adequately funded then Alternative #1 may stretch the county's financial ability to obtain concurrency with Capital Facilities needs. In addition, the County is no longer collecting TIF funds due to the resolution based 2 years ago but yet there is no evidence in the record of additional funds and, FOCC questions whether the TIF funds were a foundation for the CFP in 2004 and 2007 and, if so, what funds have replaced those funds to financially support the Capital Facilities Plan. The question for the Planning Commission and the BOCC is "have the projects required under the concurrency of the GMA requirements for the 2004 and 2007 Comprehensive Plan been funded or abandoned? The Plan appears to require the following:

The concurrency requirement of the GMA mandates that local jurisdictions adopt and enforce ordinances that prohibit development approval if the development causes the LOS on certain transportation facilities to decline below the standards adopted under the comprehensive plan, unless transportation improvements or strategies to accommodate impacts of the development are made concurrent with the development. Concurrent with development means that improvements or strategies are in place at the time of development, or that a financial commitment is in place to complete the improvements or strategies within six years. Clark County will meet these requirements through the adopted concurrency ordinance. The county has adopted a higher three-year funding standard for concurrency. See Clark County Comprehensive Plan 2004-2024 Page 5 -32 Chapter 5 Transportation Element (emphasis supplied).

However it does not appear that this part of the Current Comprehensive Plan/Capital Facilities Plan has been funded much less implemented. FOCC requests that the Planning Commission and the BOCC be provided with information that shows that the County is currently in compliance with the concurrency requirements along with how staff believes that the concurrency requirements will be able to be met under the proposed 4 alternatives. The reason is simple, if we cannot comply with what we have had on the

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books then there has to be a legitimate question for the public as to why the County believes it can fund the 2004, 2007 projects plus all potential new projects that will be required.

FOCC has reviewed the CFP components of the 2004 and 2007 plans and the 2004 Plan addresses some deficiencies:

Using capacity analysis and the adopted LOS standards, planning staff from RTC, WSDOT, and Clark County, identified future deficiencies in the regional transportation system based on the Preferred Alternative urban growth boundary map. The assumed transportation network included the existing network plus improvements identified in the Metropolitan Transportation Plan. The MTP includes the transportation improvement programs of the various jurisdictions and projects for which there is an identified regional need, strong regional commitment, and probable funding available. The 6-year Transportation Improvement Plan (TIP) is updated and adopted on an annual basis (Appendix A)(emphasis supplied).

FOCC asserts that before any decision can be made on any alternative, the County should affirmatively state that they are in compliance with the 2004 and 2007 Comprehensive and Capital Facilities Plan. Specific projects are listed at 5-11 and 5-12 but there is no indication in this record that those have been funded or completed. If the County is not in compliance with the current plan (which is Alternative #1) then the SEPA and Comprehensive Plan should acknowledge the concurrency as required by the GMA is not being met. If not being met as to Alternative #1 then the County needs to state how they are going to finance, through concurrency, the dramatic increases that will come with Alternatives #2 and #4. Although some might claim that this can be deferred to the Capital Facilities Plan, what good is it to send a CP to staff and the public if the County will be incapable of preparing a CFP that is compliant with the CP and GMA? Imagine all of the work of staff, the community and cities only to come to the conclusion that there is not enough money now to complete what was promised under the 2004 and 2007 plans?

In listening to the August work session 2015 Board time, staff continues to state that projects are not being funded. Susan Wilson talked about the state of the county transportation, specifically the TIP and ACP programing. She discussed lost

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revenue for projects and back fill with the Road Fund (\$7 million dollar lost) and realigning other projects. Basically, the County appears to be raiding the road fund and general fund because there is no TIP/TIF funds. The result may be that has delayed projects beyond the 20 year plan such as the Barberton project, reduce design budgets etc. I found it ironic that Councilor Madore blamed the state legislature and the local representatives in particular (those include Liz Pike, Lynda Wilson, Paul Harris, Brandon Vick, Ann Rivers and Don Benton). Specifically he said “our state is not doing us well” and “Hey, state legislature, our own representatives what in the world have you done to Clark County?). It seems that he thinks that the County is not responsible for its own loss of funds due to the failure of his “Jobs” resolution. So he is blaming his own friends and fellow Republicans for the lost of revenue to the County. However, whatever the issues, the County cannot meet the requirements of the 2007 CFP projects so how can the County meet the requirements of any plan that increases pressure on all CF when they cannot meet what is in the current plan?

Also, Councilors Madore & Meilke have stated that they want to give relief to landowners who own property under the Urban Reserve/Urban Holding designations. However, under GMA, those designations are only to be lifted if, and only if, urban services are available to handle the densities provide for once the overlays are lifted. Since the overlays have not yet been lifted, it is logical for the public to assume that the County does not have the funds to provide the infrastructure for those densities at this time. If that is the case, and the Council decides to lift those overlays, how will that be compliant with GMA and the new Comprehensive Plan. Also, it would be important to note how many of the citizens within those overlays were in favor of being in those zones when they were originally proposed.

As FOCC has previously pointed out, the history of the Urban Reserve and Urban Holdings designations were part of the original Comprehensive Plan as mitigation for the larger populations allowed in the rural zones as they remained rural (and if memory serves resource as well) until such time as urban services became available. Yet, in the cumulative impact section of the current DSEIS, there is no discussion regarding what the cumulative impacts would be of the additional lots in the rural area combined with the lifting of the Urban Reserve and Urban Holding zones. There is also no discussion as to whether the County can afford the proposals currently in place plus the costs that would be associated with lifting the urban reserve/urban holding overlays plus adding the dramatic increase in the population in the Rural Area under Alternatives #2 and #4.

Certainly, it is possible that all of these funds are available but, at this juncture, they are not part of the record.

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Clark County Community Planning  
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One final request and one additional point for the record. First, there has been quite a bit of comment regarding the fact that the Poyfair remand was not complied with and the current SEPA process is inadequate and therefore we request the original FEIS (and SFEIS) for the 1994 Comprehensive Plan be made a part of this record so that when people review the massive changes in zoning from the original proposals to today, specifically with regards to rural landowners and stakeholders, they can see how big an impact rural landowners voices made on zoning in the rural area. Second, one additional point is that the Senate passed a bill in 2005 (ESSB 5186 and related bill SB 1565) amended the GMA to require that communities create plans that promote healthy lifestyles. There is nothing that can be seen in the DSEIS that addresses the requirements set forth by these two laws (see WSDOT policy paper that is attached and incorporated by this reference.

We appreciate continuing to have the opportunity to place information in the record and hope that the decision makers find it helpful in their deliberation processes.

Sincerely,



David T. McDonald  
On Behalf of Friends of Clark County





## Planning for Bicycling and Walking: 2005 Amendments to the Growth Management Act

August 2005

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### Overview

This guidance is intended to help those Washington counties, cities, and towns fully planning under the Growth Management Act (GMA) to understand and comply with 2005 amendments to the GMA requiring communities to plan for bicycle and pedestrian transportation and physical activity. Many local governments have already met these requirements; however, this guidance may provide some new ideas. In addition, it is in the best interest of communities to have fully-developed and adopted plans for bicycle and pedestrian transportation networks to be ready as grant opportunities arise.

The Washington state departments of Transportation (WSDOT), Community, Trade, and Economic Development (CTED), and Health (DOH) used WSDOT's *2005 Bicycle Transportation and Walkways Plan*,<sup>1</sup> DOH's *Washington State Nutrition and Physical Activity Plan*,<sup>2</sup> and information regarding active living and active community environments as the basis for this guidance.<sup>3</sup>

### Background

Obesity in the United States has become an epidemic over the past two decades.<sup>4</sup> The latest data from the National Center for Health Statistics shows that 30 percent of U.S. adults 20 years of age and older – more than 60 million people – are obese. Among children and teens aged 6-19 years, 16 percent (over 9 million young people) are considered overweight. Being overweight or obese increases the risk of many diseases and health conditions. One of the contributing factors to obesity in our nation and our state is lack of physical activity. Despite all the benefits of being physically active, most Americans are sedentary. The belief that physical activity is limited to exercise or sports may keep people from being active. Another myth is that physical activity must be vigorous to achieve health benefits. Physical activity is any bodily movement that results in an expenditure of energy.

Communities, homes, and workplaces can all influence people's health decisions. Because of this influence, it is important to create environments in these locations that make it easier to engage in physical activity and to eat a healthy diet. Engrossed Substitute Senate Bill (ESSB) 5186, passed by the Washington State Legislature in 2005, made two amendments to the GMA to require Washington communities to address this problem. This bill:

1. Requires communities to consider urban planning approaches that promote physical activity, and
2. Requires a bicycle and pedestrian component be included in the Transportation Element of a comprehensive plan.

Another bill, 2SHB 1565 also passed in 2005, specifies that multiple modes of transportation may be included in concurrency programs when reviewing the transportation impacts of new development.

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<sup>1</sup> Washington State Department of Transportation, *Washington State's 2005 Bicycle Transportation and Pedestrian Walkways Plan*, 2005. [www.wsdot.wa.gov/bike/PDF/2005\\_bicycle\\_transportation\\_pedestrian\\_walkways\\_plan.pdf](http://www.wsdot.wa.gov/bike/PDF/2005_bicycle_transportation_pedestrian_walkways_plan.pdf).

<sup>2</sup> *Washington State Nutrition and Physical Activity Plan: Policy and Environmental Approaches*  
[www.doh.wa.gov/cfh/NutritionPA/default.htm](http://www.doh.wa.gov/cfh/NutritionPA/default.htm).

<sup>3</sup> U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Division of Nutrition and Physical Activity, National Center for Chronic Disease Prevention and Health Promotion, Active Community Environments Initiative, Atlanta, Georgia. [www.cdc.gov/nccdphp/dnpalaces.htm](http://www.cdc.gov/nccdphp/dnpalaces.htm).

<sup>4</sup> Ibid.



## 1. Urban Planning Approaches that Promote Physical Activity

ESSB 5186 added a requirement to the Land Use Element of the comprehensive plan for jurisdictions fully planning under the GMA: “Wherever possible, the Land Use Element should consider utilizing urban planning approaches that promote physical activity” [RCW 36.70A.070(1)]. Several studies have demonstrated that a person’s immediate environment is the most important determination of physical activity.<sup>5</sup> In many communities, practices such as Euclidean zoning (separated land uses), disconnected development patterns, and auto-oriented street standards have created an environment that makes walking and bicycling challenging and unappealing. With increased suburbanization, more and more Washington residents live in automobile-oriented communities rather than an environment where active modes of transport (walking, cycling, and other non-motorized methods) are encouraged.

In a movement to counter this trend, the CDC is promoting an Active Community Environments (ACEs) Initiative. ACEs are places where people of all ages and abilities can easily enjoy walking and bicycling as part of everyday life. These areas support and promote physical activity with sidewalks, safe crossings, bicycle facilities, paths and trails, parks and open spaces, and recreation facilities. They are also places where mixed-use development is promoted and people live within a connected grid of streets that allow easy walking between homes, work, schools, and stores. To fulfill the requirements of ESSB 5186, the following examples could be considered urban planning approaches that promote physical activity.<sup>6</sup>

### Land Use-Based Approaches to Promoting Physical Activity

- Designate mixed-use community centers that locate destinations within close proximity to residences to increase opportunities for walking and bicycling.<sup>7,8</sup> Neighborhood, town, and urban centers can be matched to the scale of the community.
  - Neighborhood centers are located predominantly within residential areas, and in addition to residential uses, might include pedestrian-oriented commercial uses, churches, daycares, civic buildings, schools, and small parks. Low residential densities of 4 to 8 dwelling units per acre (du/ac) provide minimum density to support transit service. Bellingham and Vancouver use neighborhood centers.<sup>9</sup>
  - Located as the focus of smaller communities, town centers may include a moderate intensity of employment, services, cultural and recreational facilities and moderate density residential (8-12 du/ac) and may be served by high capacity transit. An added bonus is that higher density land uses can provide options for smaller, more affordable housing. Many communities have long-established town centers, but the suburban communities of Mill Creek, Lake Forest Park, and Sammamish have recently designated town centers.
  - The Puget Sound Regional Council has set criteria for different types of urban centers specifying a range of 25-80 employees per acre, 10-20 households per acre, and the need for fast and frequent high capacity transit service. Outside the Puget Sound region, the cities of Bellingham and Spokane have designated their downtowns as urban centers.

<sup>5</sup> Several of these studies are referenced in *Washington State Nutrition and Physical Activity Plan: Policy and Environmental Approaches*. See [www.doh.wa.gov/cfh/NutritionPA/default.htm](http://www.doh.wa.gov/cfh/NutritionPA/default.htm).

<sup>6</sup> Many of these come from the *Washington State Nutrition and Physical Activity Plan: Policy and Environmental Approaches*. See [www.doh.wa.gov/cfh/NutritionPA/default.htm](http://www.doh.wa.gov/cfh/NutritionPA/default.htm). Other approaches can be found in documents on active community environments from the Centers for Disease Control and other sources on active living.

<sup>7</sup> Holtzclaw, J., *Using Residential Patterns to Decrease Auto Dependence and Cost*, Natural Resources Defense Council, 1994, pp. 16-23.

<sup>8</sup> Ewing, R., and Cervero, R., 2001. “Travel and the Built Environment: A Synthesis,” *Transportation Research Record*, No. 1780, pp. 87-114.

<sup>9</sup> Bellingham’s land use plan including neighborhood plans can be seen at [www.cob.org/pcdl/planning/land\\_use.htm](http://www.cob.org/pcdl/planning/land_use.htm) and Vancouver’s Land Use Element of the comprehensive plan can be seen at [www.ci.vancouver.wa.us/upload/contents/5351CompPlan\\_Chapter1.pdf](http://www.ci.vancouver.wa.us/upload/contents/5351CompPlan_Chapter1.pdf).

- Designate transit-oriented development (TOD) zones: Use high intensity TOD zones along a major transit route, or at nodes along a transit route. TOD zones are designed to provide for daily needs within walking distance of residences, and offer high quality transit for commuting and other transportation needs. The City of Vancouver uses a transit-overlay zone, which encourages infill and reinvestment in urban areas. Redmond, Tacoma, and Renton also use TOD zones.
- Encourage infill development: Allow infill techniques, such as subdivision of larger lots to provide new building lots, new home construction on existing smaller lots, division of existing homes into multiple dwelling units, and accessory dwellings (mother-in-law apartments). This type of development provides an alternative to development on the edge of an urban area, and provides higher population densities to support neighborhood services such as retail and transit. One way to encourage more infill development is to reduce impact fees in centers already served by water, sewer, and roads, and charge larger impact fees where these facilities need to be provided. The City of Vancouver has an infill ordinance.<sup>10</sup>
- Locate facilities within neighborhoods: Ensure destinations such as new parks, schools, and other activity centers are sited within walking distances of residences. This reduces the land needed for parking and provides opportunities for people to walk to these facilities. Older schools in neighborhoods can be renovated for continued or expanded use, and reduced parking requirements can encourage staff, families, and students to use active forms of transportation.
- Address standards and regulations: Review local regulations to ensure that bicyclists and pedestrians are adequately planned for in street and subdivision development standards, parking standards, and parking lot design. In addition:
  - Review minimum parking requirements for all types of land uses to ensure that excess parking does not detract from meeting bicycling, walking, and public transportation goals.
  - Use site plan review to provide an opportunity to ensure connectivity for bicycle and pedestrian access.
  - Comply with the Americans with Disabilities Act not only to provide access for the disabled, but also for people with strollers and walkers.
  - Require employers to provide bicycle parking, lockers, and showers at major employment sites.
  - Ensure that commercial parking requirements include bicycle parking and protected pedestrian access to storefronts.

### **Transportation-Based Approaches to Promoting Physical Activity**

Another important component of promoting physical activity is to ensure that high quality bicycle and pedestrian facilities are available in the community, and that users feel safe using them. Studies have found that walking trips increased in areas with gridded street patterns. People who report having access to sidewalks are 28 percent more likely to be physically active. In traditional neighborhoods with sidewalks and connected streets, walking and bike trips tend to substitute for auto trips, particularly in urban neighborhoods.<sup>11</sup> The following transportation features may help improve transportation efficiency and increase physical activity.

- Increase connections: Where possible, develop a complete street network that accommodates multiple modes of transportation and simulates a grid pattern. In addition:
  - Strive for block sizes in the range of 200-800 feet and maximum distance between intersections of 1,000 feet on arterial streets and 500 feet on local streets.

<sup>10</sup> Chapter 20.95 Vancouver Municipal Code.

<sup>11</sup> Brownson, R., *Environmental Determinants of Physical Activity in the U.S.*, American Journal of Public Health, 2001, Volume 91.

- Link dead-end streets as adjacent parcels are developed, or at a minimum, ensure bicycle- and pedestrian-only connections are developed to protect the fine-grained pedestrian and bicycle travel grid network.
  - Build connectivity between trails, pathways, neighborhoods, schools, and sidewalks to enhance the ability to be physically active.
  - Ensure trails and linear parks are planned to link activity centers, and are planned and developed as both recreation facilities and transportation routes.
- Increase transportation safety: Improve known accident locations as well as high-risk locations for pedestrians, bicycles, and motorists, paying particular attention to at risk groups including the young and the aging. Improvements may include providing connections, lighting, and signage, increasing safe crossing opportunities, reducing vehicle speeds, and installing separated paths and trails.
  - Be concerned about personal safety: Ensure that strategies such as crime prevention through environmental design (CPTED) are considered as bicycle and pedestrian facilities are developed. Fear and the perception of danger is a significant deterrent to walking, bicycling, and using public transit. A clear division between public and private space, and passive surveillance of public areas can improve safety. The cities of SeaTac and Everett have adopted CPTED principles.<sup>12</sup>

## 2. Bicycle and Pedestrian Component in the Comprehensive Plan

ESSB 5186 requires the Transportation Element of a comprehensive plan to “include a pedestrian and bicycle component to include collaborative efforts to identify and designate planned improvements for pedestrian and bicycle facilities and corridors that address and encourage enhanced community access and promote healthy lifestyles” [RCW 36.70A.070(6)(a)(7)]. Simply stated, a bicycle and pedestrian component is now specifically required in a community’s comprehensive plan. This supports goal 3 of the GMA, to encourage efficient multimodal transportation systems.

### Background

A transportation system that supports more walking and bicycling has benefits for the state, its communities, and its people. For individuals, in addition to enjoyable recreation, immediate- and long-term health benefits of physical activity include reducing the risk of heart disease, diabetes, and obesity. Fewer motor vehicles on the road will result in less pollution and a healthier environment. Walking and bicycling also have an economic impact. The value people place on bicycle and pedestrian facilities can be reflected in increased real property values and increased marketability for property located near trails and open space.<sup>13</sup> Communities with pedestrian friendly downtowns may enhance economic vitality by encouraging visitors to stop and shop at businesses. In addition, bicycle and pedestrian facilities are much less expensive to build and maintain than auto-related infrastructure.

The Federal Highway Administration’s (FHWA) 1994 goal for WSDOT and other state departments of transportation over the next 20 years is to 1) Increase biking and walking to at least 15 percent of all trips, and 2) Reduce the number of bicyclists and pedestrians killed or injured in traffic crashes by at least 10

<sup>12</sup> SeaTac Ordinance 03-1033. More information on CPTED is available on the MRSC Web site

[www.mrsc.org/askmrsc/publicSafety.aspx - safety1](http://www.mrsc.org/askmrsc/publicSafety.aspx - safety1) under Crime Prevention and [www.mrsc.org/subjects/planning/cptedbib.aspx](http://www.mrsc.org/subjects/planning/cptedbib.aspx), and other sources on the Internet such as the National Crime Prevention Council [www.ncpc.org/ncpc/ncpc/?pg=5882-2006-2486](http://www.ncpc.org/ncpc/ncpc/?pg=5882-2006-2486).

<sup>13</sup> *Economic Impacts of Protecting Rivers, Trails and Greenway Corridors*, Rivers, Trails and Conservation Assistance Program, 1995, [www.nps.gov/pwro/rtcal/propval.htm](http://www.nps.gov/pwro/rtcal/propval.htm).

percent.<sup>14</sup> Washington has adopted this goal in the 2005 bicycle and pedestrian component of Washington's Transportation Plan.<sup>15</sup>

### **Including a Bicycle and Pedestrian Component in the Comprehensive Plan**

Many jurisdictions already address non-motorized transportation with a simple map of existing and planned bicycle routes, and require that sidewalks and other facilities for bicycles and pedestrians are constructed as part of new street development. Other communities, such as Bellevue and Redmond, have comprehensive bicycle and pedestrian plans, and active bicycle and pedestrian advisory committees.

A typical process for developing a bicycle and pedestrian plan might include the following steps:

- **Inventory local conditions:** Conduct an analysis of local conditions, including existing sidewalks, crossings, paths, trails, parking, transit routes, transit stations, and other features important to people walking and bicycling. A community can then distinguish potential bicycle and pedestrian trip-making patterns by identifying corridors and routes that connect potential origins and destinations and present trail opportunities.
- **Consider citizens' travel behavior:** Identify and review travel pattern profiles for typical urban travel to identify the potential market for pedestrian and bicycle travel. This data can be obtained from regional transportation planning organizations (RTPOs) and metropolitan planning organizations (MPOs). These organizations have access to such data from national personal travel and census statistics used in their regional planning models. Of particular relevance for cities and compact communities is understanding the proportional amount of daily travel in typical urban/metropolitan areas for short types of all personal travel trips (less than 1 mile and 2 to 5 miles) and longer trips (greater than 5 or 6 miles). The percentage of total daily trips in the shorter lengths of trips is a surprisingly high percentage that reflects the potential respective markets for community pedestrian and bicycle travel. A review of pedestrian and bicycle accident patterns should also be conducted to identify locations needing safety improvements. Bicyclists and pedestrians needing special consideration may include children, the handicapped, and the elderly.
- **Set goals and identify policies:**<sup>16</sup> Identify how bicyclists and pedestrians are to be accommodated as new development occurs, and how improvements are to be prioritized. Develop a funding strategy or formula for facility development and consider benchmarks set to measure success.
- **Adopt facility design guidelines:** Consider adopting design standards and other technical assistance from WSDOT at [www.wsdot.wa.gov/Walk](http://www.wsdot.wa.gov/Walk) and [www.wsdot.wa.gov/bike/](http://www.wsdot.wa.gov/bike/).
- **Identify improvements:** Identify bicycle and pedestrian facility deficiencies or opportunities for improving safety and connections. Next, a prioritized list of recommended improvements to include in capital facility plans can be formulated.
- **Provide opportunities for public participation:** Before adopting the plan, be sure to work with and share draft plans with stakeholders including school districts; bicycle clubs; all city or county departments including public works, engineering, parks and recreation, health, police, and fire departments; adjacent jurisdictions; state agencies including CTED; and WSDOT's local programs engineers and planning managers at regional WSDOT offices.

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<sup>14</sup> This policy, which was adopted in 1994 as part of the National Bicycling and Walking Study, remains a high priority for the U.S. Department of Transportation (DOT). [www.fhwa.dot.gov/environment/bikeped/bp-guid.htm](http://www.fhwa.dot.gov/environment/bikeped/bp-guid.htm).

<sup>15</sup> Washington State Department of Transportation, *Washington State's 2005 Bicycle Transportation and Pedestrian Walkways Plan*, 2005. [www.wsdot.wa.gov/bike/PDF/2005\\_bicycle\\_transportation\\_pedestrian\\_walkways\\_plan.pdf](http://www.wsdot.wa.gov/bike/PDF/2005_bicycle_transportation_pedestrian_walkways_plan.pdf).

<sup>16</sup> Example plans, goals, and objectives are available on the Internet at [www.bikewalk.org/vision/vision\\_intro.htm](http://www.bikewalk.org/vision/vision_intro.htm) and [www.bicyclinginfo.org/pp/exemplary.htm](http://www.bicyclinginfo.org/pp/exemplary.htm).



- Develop implementation strategies: Identify funding for the plan, and consider a specific percentage of transportation funds each year. A community should also review development regulations to ensure they address bicycle and pedestrian needs. Other strategies could include integrating bicycle and pedestrian planning with other planning and development initiatives, considering education programs regarding bicycle and pedestrian safety, and conducting campaigns to encourage bicycle and pedestrian activity.
- Assess and monitor results: Conduct a periodic review of how well the plan is being implemented.

Some examples of bicycle and pedestrian planning strategies are as follows:

- Retrofit existing streets with pedestrian and bicycle facilities. For example, Olympia voters approved a 2004 ballot measure to fund parks and recreation facilities by a 3 percent increase to the private utility tax. This funding measure is anticipated to generate about \$2.5 million per year to construct 70,000 feet of sidewalk and acquire 500 acres of parkland in the next 20 years.
- Designate and improve safe routes to school. All Washington school districts are required to have suggested route plans for every elementary school (WAC 392-151-025). Information about safe routes to school is available on WSDOT's Web site at [www.wsdot.wa.gov/bike/Safe\\_Routes.htm](http://www.wsdot.wa.gov/bike/Safe_Routes.htm). School districts in many Washington communities, including Anacortes, Napavine, Richland, and Taholah recently received WSDOT grant funds to improve safe routes to school.
- Improve walking and bicycling conditions by improving connections from residential areas to health care facilities, community centers, shopping, transit, and other services. This is especially important for seniors and children. Communities might also consider providing amenities for bicyclists and pedestrians such as shade trees and landscaping, restrooms, benches, and water fountains. It is also important to eliminate hazards to bicycle travel such as parallel bar drainage grates, traffic-actuated signals unresponsive to bicycles, and roadside debris along non-motorized routes of travel.
- Use traffic calming measures such as narrower road widths, traffic circles, speed humps, and other devices to slow traffic for safer pedestrian and bicycle use, and create safer, and more attractive streets.<sup>17</sup> The City of Yakima adopted a policy in 1995 for reviewing and prioritizing neighborhood requests for traffic calming.<sup>18</sup>
- Enforce traffic laws and provide traffic safety education programs for drivers, pedestrians, and bicyclists. The Washington Traffic Safety Commission provides grant funding and education materials on their Web site at [www.wtsc.wa.gov/rfp.html](http://www.wtsc.wa.gov/rfp.html).
- Use innovative, low-cost transportation demand management (TDM) strategies (e.g., employer provided bus passes, facilities, and incentives) to help make bicycling, walking, transit, carpooling, and vanpooling more attractive commuting options. Washington's Commute Trip Reduction (CTR) Act requires certain jurisdictions to develop, adopt by ordinance, and implement a commute trip reduction plan for all major employers.<sup>19</sup>

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<sup>17</sup> Many sources of information about traffic calming are available including the Federal Highways Administration ([www.fhwa.dot.gov/environment/tcalm/](http://www.fhwa.dot.gov/environment/tcalm/)), the Institute of Transportation Engineers ([www.ite.org/traffic/](http://www.ite.org/traffic/)), and MRSC ([www.mrsc.org/Subjects/Transpo/traffic/calming.aspx](http://www.mrsc.org/Subjects/Transpo/traffic/calming.aspx)).

<sup>18</sup> Neighborhood Traffic Management Program at [www.ci.yakima.wa.us/services/streets/ntmp.asp](http://www.ci.yakima.wa.us/services/streets/ntmp.asp).

<sup>19</sup> RCW 70.94.521 through 551.

## **2SHB 1565 Multimodal Concurrency**

2SHB 1565 specified that concurrency improvements may include multimodal transportation. Under the GMA, concurrency means that public facilities, such as roads, water, and sewer, are to be provided concurrent with development. Traffic models are used as a basis to determine concurrency. Trip generation rates are applied to a potential development, and these trips are added to the traffic model to determine what kinds of improvements are needed to handle automobile trips generated from the new development. This type of model has historically focused on automobile trips and ignored walking, bicycling, and transit trips. This law states that jurisdictions may include bicycling and walking trips as they review the impact of new development. 2SHB 1565 requires WSDOT to administer a multimodal concurrency study, including proposals to amend the statute to enable effective multimodal transportation concurrency strategies. This study is due in December 2006.

## **State Agency Contacts**

**Washington State Department of Transportation (WSDOT)** maintains *The Bicycle and Pedestrian Walkways Plan*, part of the *Washington Transportation Plan*,<sup>20</sup> and provides bicycle and pedestrian planning information, design standards and other resources at [www.wsdot.wa.gov/Walk](http://www.wsdot.wa.gov/Walk) and [www.wsdot.wa.gov/bike/](http://www.wsdot.wa.gov/bike/), and sources of funding at [www.wsdot.wa.gov/bike/Funding.htm](http://www.wsdot.wa.gov/bike/Funding.htm). WSDOT's Highways and Local Programs office also has resources that may be useful at [www.wsdot.wa.gov/TA/Operations/LocalPlanning/Compplans.html](http://www.wsdot.wa.gov/TA/Operations/LocalPlanning/Compplans.html). Contact Charlotte Claybrooke, Bicycle and Pedestrian Coordinator, (360) 705-7302, [claybrc@wsdot.wa.gov](mailto:claybrc@wsdot.wa.gov) or Paula Reeves, Local Planning Liaison, Highways and Local Programs, [reevesp@wsdot.wa.gov](mailto:reevesp@wsdot.wa.gov).

**Washington State Department of Community, Trade and Economic Development (CTED)** Growth Management Services can provide technical assistance including examples of policies and bicycle and pedestrian plans from Washington communities, and assistance in implementing plans with development regulations. Contact Anne Fritzel, Associate Planner, (360) 725-3064, [annef@cted.wa.gov](mailto:annef@cted.wa.gov).

**Washington State Department of Health (DOH)** DOH's Nutrition and Physical Activity Program maintains the *Washington State Nutrition and Physical Activity Plan* on the Internet at [www.doh.wa.gov/cfh/NutritionPA/default.htm](http://www.doh.wa.gov/cfh/NutritionPA/default.htm). Contact James Kissee, Physical Activity Specialist, (360) 236-3623, [james.kissee@doh.wa.gov](mailto:james.kissee@doh.wa.gov).

## **National Planning Resources**

Pedestrian and bicycle information from the Pedestrian and Bicycle Information Center [www.pedbikeinfo.org/](http://www.pedbikeinfo.org/) and the National Center for Bicycling and Walking [www.bikewalk.org/](http://www.bikewalk.org/).

The Smart Growth Network helps create national, regional, and local coalitions to support intelligent and sustainable growth at [www.smartgrowth.org](http://www.smartgrowth.org).

California's Local Government Commission has excellent resources on transportation and community design at [www.lgc.org/index.html](http://www.lgc.org/index.html).

Several model land use codes are available for smaller communities. *Model Land Use Code for Colorado's Small Communities* at [www.dola.state.co.us/smartgrowth/resources.htm](http://www.dola.state.co.us/smartgrowth/resources.htm) and Oregon's *Model Development Code for Small Cities* at [www.oregon.gov/LCD/TGM/publications.shtml](http://www.oregon.gov/LCD/TGM/publications.shtml).

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<sup>20</sup> On the Internet at [www.wsdot.wa.gov/bike/PDF/2005\\_bicycle\\_transportation\\_pedestrian\\_walkways\\_plan.pdf](http://www.wsdot.wa.gov/bike/PDF/2005_bicycle_transportation_pedestrian_walkways_plan.pdf).

National Park Service, Rivers, Trails and Conservation Assistance Program provides technical assistance grants. [www.nps.gov/nrcr/programs/rtca/](http://www.nps.gov/nrcr/programs/rtca/)

National Parks and Recreation Association's "Step Up to Health It Starts in Parks" Initiative provides training and resources to parks professionals at [www.nrpa.org/health](http://www.nrpa.org/health).

### **Active Living Resources**

U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, Active Community Environments Initiative, [www.cdc.gov/nccdphp/dnpalaces.htm](http://www.cdc.gov/nccdphp/dnpalaces.htm).

The Washington Coalition for Promoting Physical Activity, [www.beactive.org/palinks.html](http://www.beactive.org/palinks.html).

The Active Living Network, [www.activeliving.org/](http://www.activeliving.org/).

The International City Management Association (ICMA), [icma.org/activeliving](http://icma.org/activeliving).

Active Living by Design, Robert Wood Johnson Foundation, [www.activelivingbydesign.org/](http://www.activelivingbydesign.org/).

### **State and Federal Funding Resources**

No funding was provided to implement ESSB 5186. However, there are some sources available as follows:

- WSDOT's Web site lists several sources of funds that can be use to fund these types of facilities at [www.wsdot.wa.gov/bike/Funding.htm](http://www.wsdot.wa.gov/bike/Funding.htm).
- The Infrastructure Assistance Coordinating Council (IACC) database of infrastructure funding opportunities at [www.infracfunding.wa.gov/](http://www.infracfunding.wa.gov/) including funding from the Transportation Improvement Board at [www.tib.wa.gov/default.asp](http://www.tib.wa.gov/default.asp).
- **NEW!** The Legislature provided \$74 million dollars over the next 16 years as a WSDOT grant program to be spent on bicycle and pedestrian safety, safe routes to school, and safe routes to transit, paths, and trails. \$5 million is available in the 2005-07 biennium for:
  1. Bicycle and pedestrian safety ([www.wsdot.wa.gov/TA/ProgMgt/Grants/Pedestrian\\_Bicycle.htm](http://www.wsdot.wa.gov/TA/ProgMgt/Grants/Pedestrian_Bicycle.htm)) and
  2. Safe routes to school grants ([www.wsdot.wa.gov/TA/ProgMgt/Grants/Safe\\_Routes.htm](http://www.wsdot.wa.gov/TA/ProgMgt/Grants/Safe_Routes.htm)).
- CTED planning grants for specific planning activities on a two-year cycle, and Emerging Issues grants of \$10,000 on specific emerging planning issues outside the normal grant cycle. Contact Anne Fritzel, Associate Planner, (360) 725-3064, [annef@cted.wa.gov](mailto:annef@cted.wa.gov).
- Washington Traffic Safety Commission grant funding 2005 emphasis is traffic safety and school zone and law enforcement initiatives, [www.wtsc.wa.gov/rfp.html](http://www.wtsc.wa.gov/rfp.html). Contact Lynn Drake, Program Manager, (360) 586-3484, [ldrake@wtsc.wa.gov](mailto:ldrake@wtsc.wa.gov).

**Schroader, Kathy**

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**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

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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

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**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](mailto:Oliver.Orjiako@clark.wa.gov)  
Gordy Euler, Community Planning  
(360) 397-2280 ext. 4968; [Gordon.Euler@clark.wa.gov](mailto:Gordon.Euler@clark.wa.gov)

**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](http://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](http://www.clark.wa.gov/planning/2016update/comments.html) OR <http://www.peakdemocracy.com/2963>
- Email: [comp.plan@clark.wa.gov](mailto: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](http://www.clark.wa.gov)

###

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

?

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.

**Schroader, Kathy**

---

**From:** NoReply@Clark.Wa.Gov  
**Sent:** Thursday, September 17, 2015 8:54 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: 2016 Growth Mgmt Plan

Comments:

After attending several public meetings regarding the 4 proposals. I urge council to consider adopting Plan#1. We live on 55 acres, zoned AG 20, even though it would be nice if other family members could build their homes on the land, it would effect the purpose of the land (which is ag). I do not agree with breaking down parcels to 1 and 5 acres and calling it "rural". There seems to be a development frenzy and my concern is what is left for our future generations. Let's be conservative on this LIMITED resource, and creative in other ways for job growth and housing to meet the increase need of the population.

Submitted by:  
Deborah Folkerts

Email: [debfolkerts@gmail.com](mailto:debfolkerts@gmail.com)

Address:  
12816 ne 87th ave  
Vancouver, Washington

## Schroader, Kathy

---

**From:** NoReply@Clark.Wa.Gov  
**Sent:** Thursday, September 17, 2015 9:06 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Alternative 4

Comments:

I urge you to reject Alternative 4 and adopt instead Alternative 1 and perhaps some elements of the Alternative 3 proposed by the small cities.

I am glad that the 2016 Clark County Comprehensive Plan Update has energized the community to take a closer look at rural land use and to engage in a conversation on the future of rural Clark County.

I will not be able to attend this evening's hearing and ask that these comments be placed in the record.

My family has lived in Clark County for five generations, both in rural areas and in cities. What we've learned through the generations is both can be wonderful places to live.

From visiting other family members, we also know we do not want Clark County to become another Orange County, California, with its massive sprawl.

As many others have pointed out, Alternative 4, by allowing potentially 12,400 new lots to be developed in rural Clark County, will undermine what's left of our County's rural character and overburden already strained public service. This will impact future generations in return for a temporary fix for a limited number of landowners today.

I identify with many of the concerns raised by the proponents of Alternative 4, including the need for economic opportunities for rural landowners and the need to address the reality that farmers are aging. My family has lived through these realities.

However, once development occurs, there is no going back.

Other ways to address these concerns need to be found. Here are a few examples, and Clark County should work on developing more.

Concern: Loss of economic opportunity for rural Ag land owners.

Solution – Develop and implement a robust transfer of development rights program for Clark County. The 2007 Globalwise Report at page 48 noted that “Intervention in the land market by actions such as purchase of development rights is the only assured way of holding land for agriculture” in the face of escalating land prices for commercial and residential development. At one point in this current update process, the County Council voted not to fund a TDR study. I hope that decision will be revisited.

Solution: More emphasis by on agricultural and forestry economic development, such as creating a clearinghouse for farmland leasing and attracting a USDA inspected packing meat processing plant or more USDA certified mobile processing units to Clark County. A cooperative effort by the County, WSU Extension and/or Columbia River Economic Development Council (CREDC) could help in this effort.

Concern: How aging farm owners can be helped by their families.

Solution: Eliminate legal barriers for families to place temporary structures such as manufactured homes on agricultural lands to enable younger family members to live close by to assist aging family members.

Sincerely,

Judy Zeider

PO Box 261  
Battle Ground  
WA 98604

Submitted by:  
Judy Zeider

Email: [jmzeider@aol.com](mailto:jmzeider@aol.com)

Address:

,

**Schroeder, Kathy**

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**From:** NoReply@Clark.Wa.Gov  
**Sent:** Thursday, September 17, 2015 9:35 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: No on Alt 4

Comments:

Yes on Alt 1. No on 2 and 4.

So many issues arise with Alt 4 that I'm surprised anyone on our county council would want to create these potential difficulties for us: Water, transportation, schools, and safety services alone will create havoc if not law suits. Why waste the county's time and raise the hopes of some landowners if it will just be struck down? Then there's food production, air quality, spots for larger companies to site future businesses, and the tax issues.

I heard some landowners says that they wanted to take inherited land and let all siblings build homes. Let's assume that several siblings really DO want to live that closely together which sounds a bit doubtful to me. Can we find a way to allow those few people to build multiple houses on land for themselves to be passed along but not subdivided into 1-acre sites? If not, OK, that's a tough deal, but investments are betting on the future and always involve risk.

What shouldn't involve risk is planning at the county level for basic county needs.

Submitted by:  
JAN VERRINDER

Email: [janowa85@gmail.com](mailto:janowa85@gmail.com)

Address:  
5410 IDAHO ST  
VANCOUVER, WA

## Schroader, Kathy

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**From:** Wendy Levanen <wlevanen@hotmail.com>  
**Sent:** Thursday, September 17, 2015 10:37 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** comp plan

To Whom it may concern:

First we would like to state that we support Alternative 4. We believe that it is the best plan as it supports what most landowners in rural North Clark County have envisioned for their property. We have owned property in the county for over 30 years and we feel our rights have been taken away without a vote from the people who live in the Northern part of the county. We would like for our 11 children and their families to be able to enjoy rural life in the same areas that they grew up in. They do not want to live in a subdivision, in a neighborhood, where they are restricted from certain activities or are not able to raise animals or play in the forest. For the properties that we currently own we would like to propose the following:

2.5 Acre lots for the following tax lots (239th ST)

- 227710000
- 227715000
- 227709000
- 227622000
- 227701000

2.5 Acre lots or smaller if annexed into Yacolt city limits (borders city limits)

- 229857000

5 Acre lots (Kelly Hill)

- 278821000
- 278796000
- 278802000
- 230265000

5 Acre lots (Yale)

- 986029397
- 986029398
- 986029399
- 986029400

We would like to thank you for your consideration in this matter. Our children and grandchildren will also thank you if there is affordable property in rural clark county where they can grow up and learn to respect the land. They also learn responsibility by raising a few cows or a flock of chickens, planting a garden, cutting firewood, riding motorcycles or atv's and many other activities that can only be done by living in the country.

Scott and Wendy Levanen



**Schroader, Kathy**

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**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 10:56 AM  
**To:** 'Wait, Judith Ann'; Schroader, Kathy  
**Cc:** Cnty 2016 Comp Plan; Euler, Gordon  
**Subject:** RE: Comments due by Sept. 17 on environmental analysis for growth plan

Hello Judith:

This is to acknowledge receipt of your comment. Staff will present to both PC/BOCC and include in the index of record.

Best,

Oliver

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**From:** Wait, Judith Ann [<mailto: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

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](mailto: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](mailto:Oliver.Orjiako@clark.wa.gov)  
Gordy Euler, Community Planning  
(360) 397-2280 ext. 4968; [Gordon.Euler@clark.wa.gov](mailto:Gordon.Euler@clark.wa.gov)

**Comments due by Sept. 17 on environmental analysis for growth plan**

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- Email: [comp.plan@clark.wa.gov](mailto: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](http://www.clark.wa.gov)

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## Schroader, Kathy

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**From:** Greg Weber <gregnjae@aol.com>  
**Sent:** Thursday, September 17, 2015 10:54 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** Support Plan 4

Commissioners, Planning Commission and Staff,

I have owned a 20 acre parcel in Ridgefield for the past decade and I fully support Plan 4 as a start in moving toward a future for rural land owners. The status quo does not. I also support Plan 3 for the needs of the cities, but find it hard to believe that one or the other is a viable choice, both must be considered as options to move forward. I have spent the past several months listening to testimony, personally speaking as well and taking in as much balanced information as possible. There always will be environmental and infrastructure impacts from development but it seems opponents of Plan 4 disregard the fact that site plan review, environmental assessments, traffic impact fees and additional taxes will be generated from any further development, new development is not free. Also the potential lots created by Plan 4 need to be further assessed. My neighbor has an 80 acre parcel currently zoned AG-20. Under plan 4 it is proposed to become AG-10. It would seem he can go from currently 4 parcels to 8 parcels. However, 50 percent of his property is in a wetland and high quality riparian buffer so only 40 acres could ever be developed, so actual lot potentials are a wash. Remember, we live in the northwest and much of our land in Clark County will always be in wetland, flood plain and riparian buffer areas and always be in open space. The property owners of these lands are and will continue to pay for the open space for the public to enjoy. There was a common theme that people enjoy and want to protect the open spaces and rural character of our rural communities. However, the majority of these perspectives were from people who did not own rural lands. There is nothing against anyone purchasing rural lands and keeping it in open space, but it is unfair to hold the property owners hostage for what others simply "like". Several testimonies made it very clear a frustration of having no ability for land to be divided for children and grandchildren over the past two decades--waiting 20 more years is not acceptable. There is a strong movement for small rural farms, which I support for those who wish to do this, but make it it VERY CLEAR, this is a way of life--not a livelihood. Purchasing property for 100k an acre or more, will not yield a return on investment from a farming, let alone a family wage income and retirement, the notion that we need to keep open space available for this as a viable business practice is farce. Rural property owners do not consistently have the drive, ability or time to live a rural farming way of life. Once again, those who choose to can and those to choose a reasonable ability to subdivide their rural lands should have the option as well. Plan 4 is not a "sweeping" county wide land development proposal, but it addresses the need to create appropriate zoning designations for rural parcels, improperly zoned, and address lot sizes that are non conforming which needs to be addressed now, not in 20 years. It is time to roll up our sleeves and go to work in fixing the zoning mess we have in our rural areas. Even in plan 4 there are issues to address, my parcel should be designated as R-1 in plan 4, not R-5 to give reasonable consistent lot configuration and keep the undeveloped portion as open space. I wish also to grant the county access to Whipple Creek for a future trail system. There are a lot of positive opportunities the county can take advantage if the county can embrace Plan 4 and absorb Plan 3 into it to benefit all parties involved. It frustrates me that the cities supported Plan 3 and not support plan 4. This is simply because the future to expand city growth boundaries would be hampered if there was further division of adjacent rural parcels, which once again holds rural land owners hostage based on what the cities would "like". There is a need to protect open spaces for future business and commercial growth, but these spaces are very specific and limited, using this as an excuse to not address the majority of what would clearly be rural future home sites once again holds the majority of rural land owners hostage. Many rural land owners purchased their properties as part of their retirement, allow family members to build a home, to diversify investment and have some sort of financial incentive. The current land use plan gives little hope for rural land owners future, in other words, rural land in Clark County is a bad investment under the current plan if continued for another 20 years. The time to address these issues is now upon us.

Thank you for all of your efforts in this process!!!

Respectfully,  
Greg and Jae Weber  
Owners: Confluence Vineyards and Winery  
19111 NW 67th Ave. Ridgefield, Wash. 98642  
360-887-2343

Sent from my iPad

## Schroader, Kathy

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**From:** Michael Benson <michaelbenson972@gmail.com>  
**Sent:** Thursday, September 17, 2015 11:29 AM  
**To:** Cnty 2016 Comp Plan  
**Subject:** Comp plan comments

I am requesting that this be part of the public record, as submitted within the public comment period for the Comprehensive Plan Update:

To whom it may concern,

My name is Michael Benson and my wife and I are board members of Friends of Clark County (FOCC.) We decided to join FOCC as we strongly support ALT 1 for the comprehensive plan update and adamantly oppose ALT 4. We recently purchased 5 acres of rural property in La Center WA with hopes of farming and purchasing some livestock. Like many of our friends and neighbors, our water does not come from a public source but from a private well. Due to a very limited supply of well water, we have to be very selective with farming practices and must rely on crops that require little or no irrigation. I am assuming by Mr. Madore's proposal of ALT 4 that he has little or no understanding of what this means at all. Our water is not an unlimited source. In fact, while we are very conservative with use, we ran out of water multiple times last summer and even in the fall. When this happens we have no drinking water, no ability to take showers or wash clothes or even simply flush a toilet. We purchased holding tanks to store water this year at a cost of over \$4,000 just to ensure our family had the basic resources needed to live. Our neighbors directly to the north of our property, who have owned their land for decades, also ran dry this year. There are multiple small farms that we know of in our community that have faced the same issues. This problem is not just going to go away, in fact, all evidence suggests that it is getting worse. Dividing lots, breaking up farmland and building beyond what the current infrastructure can manage will only further deplete the water supply in Clark County. Does this sound like a reasonable option? Is it what the small farmers whose livelihood is on the line would choose? Does Mr. Madore intend to inform the public that his push for unsustainable development from ALT 4 will come without the basic needs to live? Water is a necessity, not a subsidy that a local official can just decide to sell off to special interest until it is depleted. If ALT 4 were to pass, what is the contingency plan once all of the farms, existing tax payers homes and new developments run out of water? The DSEIS does not account for this at all. I can assure you that I, my neighbors and the citizens of Clark County will be looking at ONE person for answers.

Please make the right choice for the citizens of Clark County. Do not take away our natural resources needed to survive. Choose what is best for whole, not for special interest. Choose ALT 1.

Thank you for your consideration and understanding,

Michael Benson  
2211 NW Coyote Ridge RD  
La Center WA 98629

## Schroader, Kathy

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**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 10:45 AM  
**To:** Euler, Gordon; Alvarez, Jose  
**Cc:** Schroader, Kathy  
**Subject:** FW: Support for Alternative 4 - Clark County Planning Commission and Board of Councilors - For the Record and the DSEIS review

FYI and for the record. Thanks.

---

**From:** Carol Levanen [<mailto:cnidental@yahoo.com>]  
**Sent:** Wednesday, September 16, 2015 5:42 PM  
**To:** Madore, David; Mielke, Tom; Stewart, Jeanne; Orjiako, Oliver  
**Subject:** Support for Alternative 4 - Clark County Planning Commission and Board of Councilors - For the Record and the DSEIS review

September 16, 2015  
the DSEIS review

For the Public Record and

Clark County Planning Commission  
Clark County Board of Commissioners  
P.O. Box 5000  
Vancouver, Washington 98666

Dear Commissioners and Councilors,

Clark County Citizens United, Inc. asks the Planning Commission and Board of Commissioners to choose Alternative 4 as the preferred alternative in the DSEIS of the 2016 Comprehensive Land use Plan.

The Record fully supports such a decision. CCCU, Inc. has done continuous research for approximately two years and submitted our findings into the record on a continuous basis. The research is both pertinent and factual and supports the mandates of the Growth Management Act. Based on that information, there is both public and legal support for Alternative 4.

Keep in mind that one of the underlying forces to the creation of Alternative 4 is the court orders of Superior Court Judge, Edwin J. Poyfair April 4, 1997, Conclusion of Law and Order, and the Court of Appeals Division II, March 12, 1999, Published Opinion. Many of the Orders from the Poyfair decision were ignored by Clark County. In particular, item 3. The Board is not above the law; item 4. failure to solicit meaningful public input; item 6. Comprehensive Plan EIS violates the State Environmental Policy Act and item 7. the county used an unauthorized formula to the review of the Clark County Comprehensive Plan's land use densities and the interpretation was erroneous. The Board's requirement for a vacant buildable lands analysis for the rural area was erroneous. The result was a plan that gave little regard for the realities of existing rural development in direct contradiction of the terms of the GMA. Clark County must now be compelled to comply with these orders. The Court of Appeals Opinion, confirmed that the GMA does not require counties to use OFM's projections as a cap on non-urban growth. The Board exceeded its authority.

It is primarily for these reasons, that Clark County Citizens United, Inc. has again come forward to assure the county complies with the courts. We urge the Councilors and Commissioners to understand and accept that the rural and resource lands cannot remain static for over twenty years and the law must be obeyed. The landowners must have relief from the massive down zoning that occurred in 1994, using unauthorized formulas and erroneous decisions. Such actions are not allowed under the Growth Management Act.

Sincerely,

Carol Levanen, Ex. Secretary  
Clark County Citizens United, Inc.  
P.O. Box 2188  
Battle Ground, Washington 98604

## Schroader, Kathy

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**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 11:00 AM  
**To:** Euler, Gordon; Alvarez, Jose; Anderson, Colete  
**Cc:** Schroader, Kathy  
**Subject:** FW: Letter re comp plan  
**Attachments:** GARret's letter.docx

FYI and for the record. Thanks.

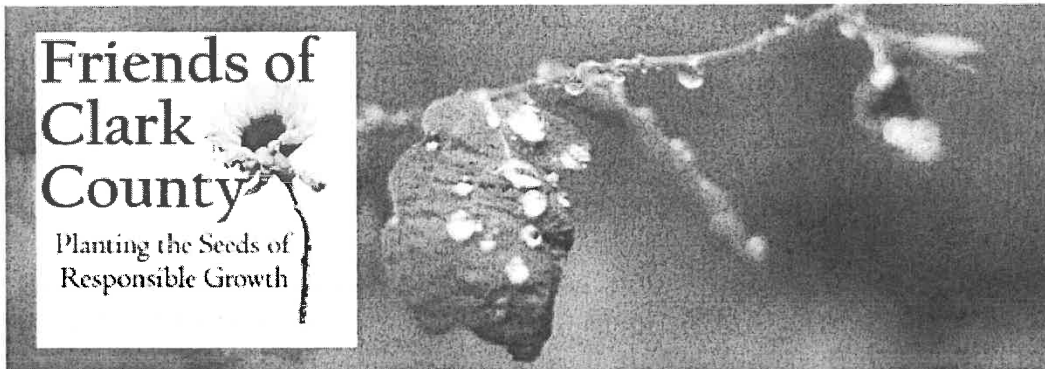
Oliver

-----Original Message-----

**From:** Coyote Ridge Ranch [<mailto:coyoteridge@tds.net>]  
**Sent:** Thursday, September 17, 2015 7:26 AM  
**To:** Orjiako, Oliver  
**Subject:** Letter re comp plan

Valerie Alexander  
Coyote Ridge Ranch  
2404 NW Coyote Ridge Rd.  
La Center, WA 98629  
Phone & Fax: 360-263-2521  
cell: 360-607-8797  
[coyoteridge@tds.net](mailto:coyoteridge@tds.net)





Friends of Clark County  
PO Box 513  
Vancouver, WA 98666  
(503) 701-9203  
[bianca@friendsofclarkcounty.org](mailto:bianca@friendsofclarkcounty.org)

September 6, 2015

Clark County Councilors  
PO Box 5000,  
Vancouver, WA 98666  
[boardcom@clark.wa.gov](mailto:boardcom@clark.wa.gov)

Dear Councilors,

The following are letters from Clark County farmers commenting on the comp. plan update and the alternatives you are considering.

From Garret Hoyt, Owner of Five Sprouts Farm.

Alternative 4 (and 2 also) will provide opportunity for landowners to subdivide larger tracts of land, which will provide a benefit to landowners, but at the detriment to the community as a whole.

Smaller lot sizes make it more challenging to produce food. While individuals can have apple trees or otherwise grow edibles on smaller lots, and home gardens are absolutely a good thing, the vast majority of our food comes from larger farms because that is where our food is grown. If lot sizes decrease, it will decrease accessibility to local healthy food and that has major health and food security implications.

If there are more lots, it will also result in more wells being



drilled. That puts a greater pressure on our groundwater supplies for residential use. Water is often a major factor influencing the crops that farmers are able to grow and the quantities that are able to be produced. More residential wells will ultimately decrease access to water for farmers, and decrease access to healthy local food.

The parcelization of the county will also lead to more separation between farms which will create barriers to collaboration and make agriculture production districts far more difficult.

While the consequences of Alt 4 will not be seen immediately, it will slowly destroy the county's access to local healthy food and it will slowly destroy our local agricultural economy.

Garrett Hoyt

## Schroader, Kathy

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**From:** Euler, Gordon  
**Sent:** Thursday, September 17, 2015 11:50 AM  
**To:** Schroader, Kathy  
**Subject:** FW: DSEIS deadline news release has been posted on County Facebook and Twitter.

Kathy:

For the index.

Gordy

---

**From:** McCall, Marilee  
**Sent:** Tuesday, September 15, 2015 11:34 AM  
**To:** Keltz, Mary; Orjiako, Oliver; Euler, Gordon  
**Subject:** DSEIS deadline news release has been posted on County Facebook and Twitter.

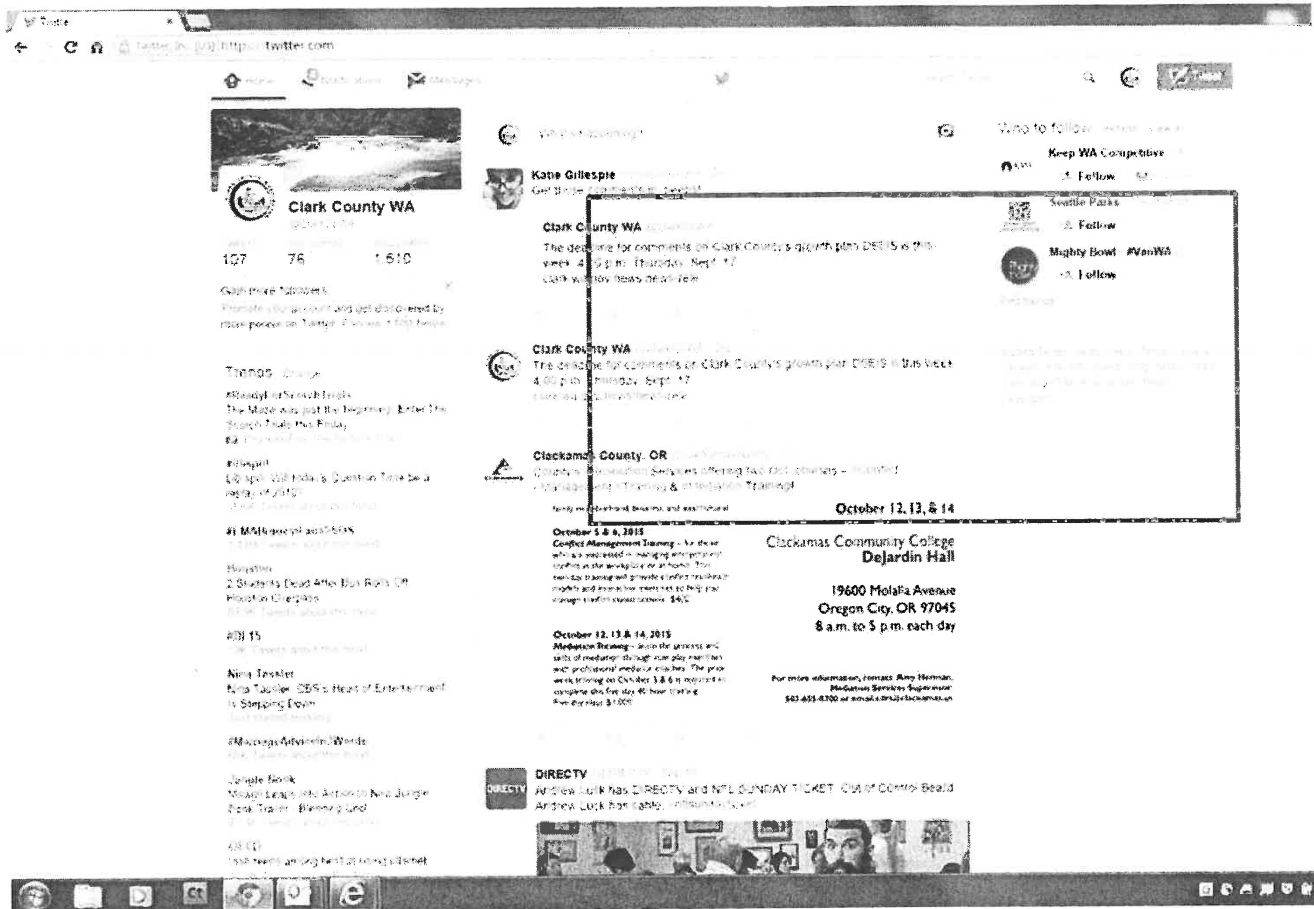
DSEIS deadline news release has been posted on County Facebook and Twitter.

And Katie Gillespie has already re-tweeted! (Screen shot below) ☺

Marilee McCall ext. 4455

**Administrative Assistant**  
*Public Information & Outreach*

## TWITTER POST:



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Over Clark County Planning Phone (200) 547-4700 ext. 4147000, email: Clark.AK@COCLW.org

The deadline for comments on Clark County's draft supplemental environmental impact statement on the growth plan alternatives is this week - 4:00 p.m. Thursday, Sept. 17.

Planning Commission members will be meeting at 6:50 p.m. at the Public Service Center building, 6th floor, 1300 Franklin St., Vancouver, WA. The last public hearing was held on September 10.

Boost your post to reach more of the people who matter to you. Click here to get started.

Boost Post

## Schroader, Kathy

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**From:** Tilton, Rebecca  
**Sent:** Thursday, September 17, 2015 12:03 PM  
**To:** Orjiako, Oliver; Schroader, Kathy  
**Subject:** Comp Plan Update comments  
**Attachments:** Susan Rasmussen\_09-15-15.pdf; Carol Levanen\_09-15-15.pdf; Sydney Reisbick\_09-15-15.pdf

Hello,

The attached comments were submitted during the public comment portion of the Sept. 15 BOCC Hearing.

Thanks,  
Rebecca

Rebecca Tilton, Clerk of the Council  
Board of County Councilors  
1300 Franklin Street  
PO Box 5000  
Vancouver, WA 98666-5000  
PHONE: 360-397-2232, ext. 4305 | E-MAIL: [Rebecca.Tilton@clark.wa.gov](mailto:Rebecca.Tilton@clark.wa.gov)

cc'd (via email) - BOCC  
Orjiako + Schroeder

RECEIVED BY ALL COUNCILORS

susan rasmussen  
to susan rasmussen

Tue, Sep 15 9:35 AM

Re: Site specific rezone request

RECEIVED

SEP 15 2015

BOARD OF  
COUNTY COUNCILORS

Sent from Windows Mail

**From:** susan rasmussen  
**Sent:** Tuesday, September 15, 2015 9:33 AM  
**To:** susan rasmussen

Regarding Property Identification Number: 222586000

Property Address: 5300 NE 299th Street, La Center, WA. 98629

Abbreviated Legal Description: #59 SEC 7 T4N R2EWM 20A

I request that this 20 acre parcel, zoned AG-20, be rezoned to AG-5 acre parcels. Prior to the 1994 adoption of the Clark County Comprehensive Plan, this was zoned 2.5 acre density.

This 20 acre piece was once part of the multi-generation Laurel Hedge Dairy Farm. This is all that remains of the 110 acre family dairy that was farmed by George Rasmussen, then his son Peter Rasmussen. In the interest of generational continuity of the family farm, we want the opportunity to be able to pass this property on to our three children, however, the current zoning of Ag-20, and the proposed zoning of Ag-10 is to prohibitive.

Five acre parcels are on the south side of our street, NE 299th, and west of us.

Please be so kind as to consider our request to AG-5 zoning.

Thank you,  
Susan Rasmussen  
30101 NE Charity Road  
La Center, WA. 98629

Sent from Windows Mail

Note: Intended for Printing Only. Site navigation tabs and links may not work properly from this page.

[New Search](#)

## Clark County Property Information Account Summary

**Property Identification Number:** 222586000 [MapsOnline](#)  
**Property Type:** Real  
**Supplemental:** Land valued as Farm and Agricultural Land  
**Property Status:** Active **Tax Status:** Regular  
**Site Address:** 5300 NE 299TH ST, LA CENTER, 98629 ([Situs Addresses](#))  
**Abbreviated Legal Description:** #59 SEC 7 T4N R2EWM 20A

[Web Version](#)

[Page to PDF](#)

[Account](#) [Building](#) [Environmental](#) [Taxes](#) [Auditor Docs](#) [Documents](#) [Permits](#) [Sales Search](#)

Property Owner	Owner Mailing Address	Property Location Address
RASMUSSEN SUSAN & RASMUSSEN PETER J	PO BOX 903 LA CENTER WA , 98629 US	5300 NE 299TH ST, LA CENTER, 98629 <a href="#">Google Maps Street View</a> <a href="#">Bing Maps Birds Eye</a>
Administrative Data <a href="#">Info...</a>	Land Data	Assessment Data <a href="#">Info...</a>
Zoning Designation <a href="#">Codes...</a> AG-20	<a href="#">Clark County Road Atlas</a> page 45	<b>2015 Values for 2016 Taxes</b>
Zoning Overlay(s) none	Approximate Area <a href="#">Info...</a> 871,200 sq. ft.	Market Value as of January 1, 2015
Comprehensive Plan AG	20 acres	Land Value \$194,132.00
Comp. Plan Overlay (s) none	Subdivision no data	Building Value \$25,611.00
Census Tract 402.03	Survey 042164	Total Property \$219,743.00
Jurisdiction Clark County	043177	<b>Taxable Value</b>
Fire District Clark Co Fire	<b>Septic Document Details</b>	Total \$38,133.00
Park District n/a	Application Date October 28, 2010	<b>2014 Values for 2015 Taxes</b>
School District La Center	Last Inspected August 6, 2010	Market Value as of January 1, 2014
Elementary La Center	Permit: August 3, 2010	Land Value \$170,420.00
Middle School La Center	As-Built: December 21, 2009	Building Value \$26,243.00
High School La Center		Total Property \$196,663.00
Sewer District Rural/Resource	<b>Sales History</b>	<b>Taxable Value</b>
Water District Clark Public Utilities	Sale Date 05/15/2007	Total \$37,994.00
Neighborhood East Fork Frontier	Document Type DEED	
Section-Township-Range SW 1/4,S07,T4N,R2E	Excise Number 614407	
image: <a href="#">TIF</a> or <a href="#">PDF</a>	Document Number	
Urban Growth Area County	Sale Amount \$260,000.00	
C-Tran Benefit Area No	Sale Date 10/11/2002	
School Impact Fee La Center	Document Type D-QCD	<b>General</b>
Transportation Impact Fee Rural 2	Excise Number 506526	Re-valuation Cycle 4
Transportation Analysis Zone 592	Document Number	Assessor Neighborhood 42
Waste Connections Garbage Collection Day Tuesday	Sale Amount \$0.00	
Last Street Sweeping n/a	Sale Date 09/10/1998	
CPU Lighting Utility District 0	Document Type D-QCD	
Burning Allowed Yes	Excise Number 437292	
Wildfire Danger Area No	Document Number	
	Sale Amount \$157,000.00	

**Schroader, Kathy**

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**From:** Tilton, Rebecca  
**Sent:** Thursday, September 17, 2015 12:03 PM  
**To:** Orjiako, Oliver; Schroader, Kathy  
**Subject:** Comp Plan Update comments  
**Attachments:** Susan Rasmussen\_09-15-15.pdf; Carol Levanen\_09-15-15.pdf; Sydney Reisbick\_09-15-15.pdf

Hello,

The attached comments were submitted during the public comment portion of the Sept. 15 BOCC Hearing.

Thanks,  
Rebecca

Rebecca Tilton, Clerk of the Council  
Board of County Councilors  
1300 Franklin Street  
PO Box 5000  
Vancouver, WA 98666-5000  
PHONE: 360-397-2232, ext. 4305 | E-MAIL: [Rebecca.Tilton@clark.wa.gov](mailto:Rebecca.Tilton@clark.wa.gov)



CCID- BOCC  
Orjiako  
Schroeder

Clark County Board of Councilors  
P.O. Box 5000, Vancouver, Washington 98666

September 14, 2015  
For the Public Record

Dear Councilors,

Clark County Citizens United, Inc. believes careful consideration should be given the 1992 Framework Plan and previous Clark County Comprehensive Plans, goals and guidelines to determine planning strategies. The 1992 Framework Plan guided the 1994 Plan, which continued, particularly in Rural and Resource .

In 1960, the first Comprehensive Plan was adopted for urban areas and allowed one acre zoning in all unincorporated areas. In 1976 a new Plan was proposed that changed one acre zoning to larger lot sizes. The "Introduction" states, "The citizens of Clark County have reached general conclusions about the future of Clark County." It goes on with "assuring the private ownership of land". "Rural Lands" Goals 2. states, "...as rural areas for the maintenance of diverse life style opportunities for present and future generations." 3. "To encourage the maintenance of small farms or acreage home sites on lands suitable for sparse settlement" Conservation Goals, 13. Identify commercial forest land suitability by evaluating soil productivity, land ownership patterns and existing use. "Definitions - describe Prime Agricultural Land as Soil Conservation Service Capability Classes I and II.

The 1977 Framework Plan, 2. b. says "Amendments to the 1960 Comprehensive Plan that would not be repealed by adoption of the Framework Plan... Included in this Plan is Appendix D - Fiscal and Economic Impact analysis" B. "The Framework Plan is intended to provide a general and logical direction for the physical development of the County. a. Natural Resources - Agriculture - "Clark County's agricultural employment represents only 0.03 of 1 percent...economically....., less than enough to supply local demand.

The Comprehensive Plan was revised in 1988. Page 7 says, "Prime agricultural soils are located in the Vancouver lowlands, in Camas and Washougal and small areas in the remainder of the plains areas.... Forest - on page 12 says "The forest land in the northern part of the county is found on soils classified by the Soil conservation Service as Forest Site Index 2, which are prime timberlands. These forest lands in northern and eastern Clark county are the primary commercial forest lands in the county. Agriculture -says, "...acres deemed most suitable for agricultural activities by the Soil Conservation Service based upon soil types. Exceptions are areas which have been parceled into rural residential lots. under ten acres in size. ...single family homes make up 80% of all housing in unincorporated Clark County. The predominant housing density is ....5,500 to 43,559 square feet in size. The next most common housing density is one ...home on lots one 1 to 4.99 acres in size. "Major Agricultural areas identified are in the Brush Prairie areas, Pioneer, Vancouver Lake Lowlands, Sara and the Burnt Bridge Creek bottomlands. Page 16, 8. Lot sizes in rural residential areas should be related to the existing development pattern... Page 19, Rural Residential - rural Residential...are widely distributed throughout the County outside of urban growth areas. The rural densities recognized on the Plan are: suburban 1 to 2.5 acres; rural Residential 2.5 to 5 acres,; rural Estate 5 to 10 acres; Farm Residential over 10 acres.

The process for the 1994 Plan started out well enough, but quickly degenerated into the plan in place today. Changes are needed to reflect historical trends and former planning.

Sincerely,



Carol Levanen, Ex. Secretary  
Clark County Citizens United, Inc.  
P.O. Box 2188  
Battle Ground, Washington 98604

**Schroader, Kathy**

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**Sent:** Thursday, September 17, 2015 12:03 PM  
**To:** Orjiako, Oliver; Schroader, Kathy  
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Thanks,  
Rebecca

**Rebecca Tilton, Clerk of the Council**  
**Board of County Councilors**  
1300 Franklin Street  
PO Box 5000  
Vancouver, WA 98666-5000  
PHONE: 360-397-2232, ext. 4305 | E-MAIL: [Rebecca.Tilton@clark.wa.gov](mailto:Rebecca.Tilton@clark.wa.gov)

CC'd - BOCC  
Orjiako  
Schroeder

Board of County Councilors  
Community Planning Staff  
1300 Franklin St  
Vancouver, WA 98642

Input for the record  
For the 2016 GMP process  
submitted 9/15/15  
Sydney Reisbick  
PO Box 339  
Vancouver, WA 98642

Growth does not support itself.  
Rate-payers subsidize development.  
Alternative 1 is more frugal than Alternatives 2 or 4

#### EXAMPLE

The Cost of extending the sewer from Ridgefield to Saimon Creek Treatment plant. (This is based on my own bill from Clark Regional Wastewater District)

Each household with a sewer hook-up in the Ridgefield Urban Growth Boundary pays a new charge to Clark Regional Wastewater District for the extension, which increases our bill about 50.8% from the base charge.

\$37.00 Monthly Base Service Charge  
\$18.80 System Integration/Extension Charge

18.80 divided by 37.00 is .508, which is a 50.8% increase over the base service charge. Thus we pay about a 50.8% increase in our sewer bill to support development.

This 50.8 percent increase is for every sewer hook-up in the Ridgefield growth boundary. This is for homeowners of every income level except for low-income seniors. The 50.8 increase includes seniors on medium low fixed incomes trying to shelter in place for their last years. It includes families of every income level with two jobs to support a house, families with children and/or a parent to support and people trying to launch a business.

This 50.8% increase will decrease as new connections are made to the new sewer line. However, the amount paid before the system is paid off will not be returned to the ratepayers.

We also pay a City Operating Charge that goes to the City of Ridgefield. This charge does not go down as new people come on line, but is not directly for expanding the line, so I have not included it.

Costs to the rate-payers and bond-payers for basic capital facilities will go up the more sprawl occurs. Thus, Alternative 1 will be more frugal than Alternative 2, which will in turn be more frugal than Alternative 4.

## Schroader, Kathy

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**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 12:09 PM  
**To:** Euler, Gordon; Alvarez, Jose; Anderson, Colete  
**Cc:** Schroader, Kathy  
**Subject:** FW: Letter re GMA Comp Plan Update from BIA, CCAR and ICC  
**Attachments:** GMA ltr for BIA, CCAR and ICC.pdf

FYI and for the record. Thanks.

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**From:** Lisa McKee [<mailto:lisa.mckee@jordanramis.com>]  
**Sent:** Thursday, September 17, 2015 12:06 PM  
**To:** Cnty 2016 Comp Plan; Cnty Board of County Councilors General Delivery; Orjiako, Oliver  
**Cc:** 'Avaly Scarpelli'; 'michele@ccrealtors.com'; 'Carrie Leder'; 'John McKibbin'; Jamie Howsley; Joseph Schaefer; Peter Watts  
**Subject:** Letter re GMA Comp Plan Update from BIA, CCAR and ICC

Hello,

Attached is a letter on behalf of the Building Industry Association of Clark County, the Clark County Association of Realtors and Identity Clark County.

If you have any trouble opening the attachment please let us know.

Thank you.

**LISA McKEE** Legal Assistant to James D. Howsley  
**Jordan Ramis PC** | Attorneys at Law  
Direct: 360-567-3909 Main: 360-567-3900

Portland OR | Vancouver WA | Bend OR  
[www.jordanramis.com](http://www.jordanramis.com)



September 17, 2015

Dear Chair Madore, Councilor Mielke and Councilor Stewart:

On behalf of the undersigned business organizations we respectfully request that the Board take swift action to hit pause on the current Growth Management Act (GMA) Comprehensive Plan update. We believe that the circumstances have radically changed within Clark County since the start of the update process and a reset is needed. We believe that a reset, if requested, will be granted and may provide a better opportunity for Clark County to meet the housing and employment needs of its residents over the next twenty years.

The current trajectory of the plan sets up a divide between the urban and rural areas that is unnecessary. The business community understands and empathizes with many of the issues raised by rural property owners in this process, but by planning for the likely growth that will come to this community the rural issues can be addressed without impacting the land necessary to grow housing and jobs on.

### Lands for Jobs

Clark County and its cities continue to blossom with positive employment growth after the end of the recession. But the new Comprehensive Plan is as much about the next twenty years as it is about present conditions. Clark County should not let the positive economic forces at work flounder by not having enough land set aside for employment over the next twenty years.

Clark County remains uniquely positioned in the Portland/Vancouver Metropolitan area to receive a disproportionate share of employment growth. Washington's tax structure along with the County's business ready attitude lends itself to ensnaring businesses that want to create their own change of circumstances. New employers continue to seek refuge here moving in from out of state while many of the existing businesses continue to thrive, expand, and drive our community forward.

Clark County's distinct advantage over its neighbors in Oregon is large acreage parcels ready to accommodate future sizable employers. But with each success story the supply line dwindles further. Having an adequate supply of land is necessary to ensure that our community remains attractive to employers.

We strongly believe that the assumptions currently being used in this planning process, primarily the population forecast and market factor remain woefully low to accommodate what is likely to happen in the next twenty years. Clark County should remain the County of opportunity. And by addressing the flawed assumptions, it does not have to be a choice between rural or urban interests.

Madore, Mielke, Stewart  
September 17, 2015  
Page 2

**Housing**

An affordable and well built housing stock works as another tool to attract quality employers. Employers want their employees to be happy in their communities and home ownership percentages are often a very important gauge to determine the health of a community.

Again we should proceed cautiously when planning for a twenty year horizon and make sure that we get the fundamental assumptions correct. If we under-plan we run the risk of creating market conditions where housing no longer is affordable for the employees we need to further business in the County.

**Legislative Reset**

In addition to the demographic and economic changes occurring since the start of the GMA update process, the County also passed a Charter. As this Board is well aware, this will drastically change the structure of County government.

These unique sets of conditions glimmer with opportunity to ask the Washington legislature in 2016 to delay and reset the County's obligation to adopt a Comprehensive Plan by June 2016. We believe that with a unified community as signified by the partners signed onto this letter we can postpone adoption of a plan to examine the fundamentals of this plan and ensure that we do in fact have enough land in the right places to accommodate job and population growth.

We therefore respectfully request that this Board strongly consider the reset option.

Respectfully,



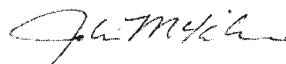
Avaly Scarpelli  
Executive Director  
BIA of Clark County

Respectfully,



Janice Hall  
President  
Clark County Assoc. of Realtors

Respectfully,



John McKibbin  
President  
Identity Clark County

# 2016 Comprehensive Plan Proposed Alternatives Analysis

*What are your thoughts on the 2016 Comprehensive Plan proposed alternatives analysis?*

All Statements sorted chronologically

As of September 17, 2015, 11:27 AM



*As with any public comment process, participation in Engage Clark County is voluntary. The statements in this record are not necessarily representative of the whole population, nor do they reflect the opinions of any government agency or elected officials.*

# 2016 Comprehensive Plan Proposed Alternatives Analysis

*What are your thoughts on the 2016 Comprehensive Plan proposed alternatives analysis?*

As of September 17, 2015, 11:27 AM, this forum had:

Attendees: 88

All Statements: 11

Minutes of Public Comment: 33

This topic started on August 4, 2015, 3:52 PM.



## 2016 Comprehensive Plan Proposed Alternatives Analysis

What are your thoughts on the 2016 Comprehensive Plan proposed alternatives analysis?

Terry Conner inside Clark County (on forum)

September 17, 2015, 10:58 AM

I support Alt 1, not because I believe that status quo is the best option long term, but because it is the best option now. Until a more realistic and accepted plan is presented, vetted and evaluated by environmental and community studies, we must not "re-create the wheel" at the whim of an unethical Council member. The political motives of Clark County Citizens United and Councilor David Madore are wholly responsible for the illegitimate creation of Alt 4. I am completely against Alt 4.

1 Supporter

---

Suzanne Kendall inside Clark County (on forum)

September 17, 2015, 10:36 AM

I am in full agreement with these two positions submitted previously:

1. To allow for the transition to a home rule county to fully complete: Clark County is in a transition year in terms of implementing the voter approved home rule charter. In this exceptional circumstance, it makes sense to me to postpone the deliberations and recommendations of changes to the current Comprehensive Plan until the two new councilors are elected and seated in January 2016.

2. To allow staff to address information gaps: As many who have testified have noted, the DSEIS that is under review is inadequate in its evaluation of the cumulative impacts of Alternative 2 and Alternative 4. Given the scope of potential environmental impacts of the creation of 8,200-12,400 new rural "lots" that these two alternatives allow, it seems that a full EIS would better provide a thorough analysis upon which informed decisions could be made. And, as others have testified, there are also economic impacts inherent in each alternative that have not been thoroughly investigated and deliberated. Susan Rasmussen of Clark County Citizens United suggested in her letter to the editor, published in the Columbian on August 3, 2015, "Common sense would dictate that if the planners and elected leaders callously down-zoned thousands of acres, (in the 1990s) surely an economic analysis would be a prime consideration...this is required under the state Growth Management Act. This has not been done in Clark County." Surely we would not choose to make the same mistake twice and up-zone thousands of acres without first doing a thorough economic analysis. In my opinion, to do so is akin to hoping that somehow two wrongs will magically create a right.

Suzanne P Kendall  
Vancouver WA 98683

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Roseann Thomsen inside Clark County (unverified)

September 17, 2015, 7:36 AM

Having lived in rural Clark County for 30 years, I believe the current growth management plan is satisfactory. Alternative 4 will benefit individuals that currently own large parcels, but would negatively impact their neighbors and local towns as infrastructure needs grow. Benefiting a few at the cost of many is short-sighted. The environmental, social, and economic impact does not pencil out in a positive way for our community.

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Name not available (unclaimed)

September 16, 2015, 5:55 PM

## 2016 Comprehensive Plan Proposed Alternatives Analysis

What are your thoughts on the 2016 Comprehensive Plan proposed alternatives analysis?

The alternatives outlined in the draft EIS each have their degree of unavoidable adverse effects. We strongly oppose Alternative 4, as it has the highest potential for negative impacts among all of the presented alternatives, could promote extensive and excessive growth in the county, and could affect the largest amount of acreage. We are alarmed at Alternative 4's proposal to allow dramatic reduction in rural lot sizes. Perhaps instead Clark County should be exploring strategies that would allow large tracts of forested and/or rural lands to remain in their original uses in a way that is not just feasible, but profitable, for the property owner. We oppose Alternative 2 for much the same reasons.

We have no real objections to either Alternative 3, which would address cities' concerns and allow growth within their respective communities. We believe developed portions of communities should be consolidated with their infrastructure development, and not scattered. We also have no objection to the no-action alternative that would maintain the existing 2007 Comprehensive Plan.

When viewing the various county maps, it appears evident that there has not been historically controlled human growth in Clark County, regardless of past growth management plans and guidelines. And this human growth continues to expand cumulatively into otherwise non-intruded and undeveloped areas. The maps show mosaics of various land uses, such as residences, businesses, infrastructure development, support facilities, and so on, which implies uncontrolled and unregulated past human growth. This has allowed individuals to create their residences, their businesses, secondary businesses, roads and small support businesses, stores, shops, without structured guidelines and constraints.

Our principal concerns of the current growth management plan draft EIS, on which a preferred alternative should be selected, are:

1. Preservation of continuous tracts of undeveloped rural, farm, and forested properties in the county.
2. Prevention of future human intrusion into undeveloped and non-impacted forested, rural, wildlife habitat, and farmland.
3. Maintaining and addressing the historic, cultural, rural, and cultural perceptions of the county in this planning effort.
4. Consolidating human development in already impacted/developed areas. The current planning effort does not seem to have covered these important issues in appropriate detail. And we do not perceive the term "mitigation" as an appropriate or acceptable means to compensate for unavoidable long-term effects.

We believe more controlled growth, and efforts to enhance the county's agricultural base, are important to Clark County and its residents, than creating thousands of rural lots that will adversely impact taxpayers, the environment, and cultural values.

Carl and Colleen Keller  
Brush Prairie, WA  
ckeller360@q.com

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Name not available (unclaimed)  
September 15, 2015

September 15, 2015, 3:55 PM

## 2016 Comprehensive Plan Proposed Alternatives Analysis

What are your thoughts on the 2016 Comprehensive Plan proposed alternatives analysis?

Planning Commission  
Board of County Councilors  
c/o Oliver Orjiako, Director  
Clark County Community Planning  
1300 Franklin St.  
Third Floor  
Clark County, WA 98660

Dear Planning Commissioners and County Councilors,

I am writing in support of your adopting proposed Alternative 1 as an interim preferred option to the GMA Comprehensive Plan. I am in accord with others who have already testified in favor of this option. These are my reasons:

1. To allow for the transition to a home rule county to fully complete: Clark County is in a transition year in terms of implementing the voter approved home rule charter. In this exceptional circumstance, it makes sense to me to postpone the deliberations and recommendations of changes to the current Comprehensive Plan until the two new councilors are elected and seated in January 2016.
2. To allow staff to address information gaps: As many who have testified have noted, the DSEIS that is under review is inadequate in its evaluation of the cumulative impacts of Alternative 2 and Alternative 4. Given the scope of potential environmental impacts of the creation of 8,200-12,400 new rural "lots" that these two alternatives allow, it seems that a full EIS would better provide a thorough analysis upon which informed decisions could be made. And, as others have testified, there are also economic impacts inherent in each alternative that have not been thoroughly investigated and deliberated. Susan Rasmussen of Clark County Citizens United suggested in her letter to the editor, published in the Columbian on August 3, 2015, "Common sense would dictate that if the planners and elected leaders callously down-zoned thousands of acres, (in the 1990s) surely an economic analysis would be a prime consideration...this is required under the state Growth Management Act. This has not been done in Clark County." Surely we would not choose to make the same mistake twice and up-zone thousands of acres without first doing a thorough economic analysis. In my opinion, to do so is akin to hoping that somehow two wrongs will magically create a right.

Though some have testified characterizing Alternative 1 as a "no action" alternative, planning commissioner Ron Barca explained quite simply in the joint hearing on September 10, 2015, that "no action" is not an accurate description of Alternative 1. Rather, Alternative 1, and the assumptions and projections upon which it is based, provides plenty of room for growth over the next couple of years. And the environmental impacts and costs to taxpayers and ratepayers are fairly well understood.

I also want to call attention to two themes that I have heard frequently in recent testimony by citizens: 1) a harkening back to a past and to remembrances of future possibilities once held dear, the promise of which was perceived to have become thwarted by public policy decisions and 2) an assertion that private property rights are a more important community value than the common good. The Growth Management Act and Comprehensive Plan are intended and designed to plan for the future, not to preserve or restore the past. The GMA Comprehensive Plan is intended to be a place-based approach for managing growth, grounded in local conditions, constraints, and culture and looking towards a community vision of a desired future. I urge planning

## 2016 Comprehensive Plan Proposed Alternatives Analysis

What are your thoughts on the 2016 Comprehensive Plan proposed alternatives analysis?

commissioners and county councilors to stay true to an orientation to the future grounded in Clark County circumstances and to balancing the diverse interests of individuals with the common interests of our entire urban-rural community of Clark County.

In this regard, I suggest loosening lingering attachments to the way things used to be and embracing future scenario planning as a way to open up everyone's thinking and visioning about what a comprehensive plan could look like that addresses, balances, and integrates the diversity of interests and values in our community. Most of the testimony I have witnessed in these matters perpetuates historical "us vs. them" thinking and does not look to a future in which the social and cultural makeup of our county will be increasingly more diverse than it is now and in which projected impacts from various climate change scenarios will demand new ideas about how we are going to live together in ways that don't further existing income inequalities and that assures there is adequate food, water and shelter for everyone. Most economic, business, and political analysts agree that the pace and complexity of change will continue to increase. Holding to the past and to 20th century possibilities will not prepare us for the uncertain future we are facing in the 21st century.

It is my testimony that to intelligently prepare for our future and our children's and grandchildren's future, we need more facts and more time for creative thinking and problem-solving before committing as a community to changes in the existing Comprehensive Plan. Adopting Alternative 1 as short term interim plan creates the time and space during this exceptional time of transition in government to 1) get all the elected decision-makers seated; 2) allow planning staff to address information gaps and analyses, and suggest some possible future scenarios; and 3) allow for thoughtful citizen deliberation and engagement around designing a preferred future vision for Clark County –one that truly balances and integrates the present diversity of interests and values among citizens and provides a foundation for a future of thriving resilience for all people, regardless of their race, creed, or income level.

Sincerely submitted,

Heather Tischbein  
1119 NW 131st Way  
Apt. A  
Vancouver, WA 98685  
September 15, 2015

Planning Commission  
Board of County Councilors  
c/o Oliver Orjiako, Director  
Clark County Community Planning  
1300 Franklin St.  
Third Floor  
Clark County, WA 98660

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## 2016 Comprehensive Plan Proposed Alternatives Analysis

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## 2016 Comprehensive Plan Proposed Alternatives Analysis

What are your thoughts on the 2016 Comprehensive Plan proposed alternatives analysis?

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Sincerely submitted,

Heather Tischbein  
1119 NW 131st Way  
Apt. A  
Vancouver, WA 98685  
September 15, 2015

Planning Commission  
Board of County Councilors  
c/o Oliver Orjiako, Director  
Clark County Community Planning  
1300 Franklin St.  
Third Floor  
Clark County, WA 98660

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1. To allow for the transition to a home rule county to fully complete: Clark County is in a transition year in terms of implementing the voter approved home rule charter. In this exceptional circumstance, it makes sense to me to postpone the deliberations and recommendations of changes to the current Comprehensive Plan until the two new councilors are elected and seated in January 2016.
2. To allow staff to address information gaps: As many who have testified have noted, the DSEIS that is under review is inadequate in its evaluation of the cumulative impacts of Alternative 2 and Alternative 4. Given the scope of potential environmental impacts of the creation of 8,200-12,400 new rural "lots" that these two alternatives allow, it seems that a full EIS would better provide a thorough analysis upon which informed decisions could be made. And, as others have testified, there are also economic impacts inherent in each

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Though some have testified characterizing Alternative 1 as a "no action" alternative, planning commissioner Ron Barca explained quite simply in the joint hearing on September 10, 2015, that "no action" is not an accurate description of Alternative 1. Rather, Alternative 1, and the assumptions and projections upon which it is based, provides plenty of room for growth over the next couple of years. And the environmental impacts and costs to taxpayers and ratepayers are fairly well understood.

I also want to call attention to two themes that I have heard frequently in recent testimony by citizens: 1) a hearkening back to a past and to remembrances of future possibilities once held dear, the promise of which was perceived to have become thwarted by public policy decisions and 2) an assertion that private property rights are a more important community value than the common good. The Growth Management Act and Comprehensive Plan are intended and designed to plan for the future, not to preserve or restore the past. The GMA Comprehensive Plan is intended to be a place-based approach for managing growth, grounded in local conditions, constraints, and culture and looking towards a community vision of a desired future. I urge planning commissioners and county councilors to stay true to an orientation to the future grounded in Clark County circumstances and to balancing the diverse interests of individuals with the common interests of our entire urban-rural community of Clark County.

In this regard, I suggest loosening lingering attachments to the way things used to be and embracing future scenario planning as a way to open up everyone's thinking and visioning about what a comprehensive plan could look like that addresses, balances, and integrates the diversity of interests and values in our community. Most of the testimony I have witnessed in these matters perpetuates historical "us vs. them" thinking and does not look to a future in which the social and cultural makeup of our county will be increasingly more diverse than it is now and in which projected impacts from various climate change scenarios will demand new ideas about how we are going to live together in ways that don't further existing income inequalities and that assures there is adequate food, water and shelter for everyone. Most economic, business, and political analysts agree that the pace and complexity of change will continue to increase. Holding to the past and to 20th century possibilities will not prepare us for the uncertain future we are facing in the 21st century.

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### 1 Attachment

[https://pd-oth.s3.amazonaws.com/production/uploads/attachments/13g7b0itgi80.560/September\\_15\\_2015\\_letter\\_to\\_Planning\\_Commission\\_and\\_BOCC.doc](https://pd-oth.s3.amazonaws.com/production/uploads/attachments/13g7b0itgi80.560/September_15_2015_letter_to_Planning_Commission_and_BOCC.doc)  
(28.5 KB)

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Name not available (unclaimed)

September 11, 2015, 9:12 AM

Alternate One Best!

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Name not available (unclaimed)

September 4, 2015, 6:37 AM

Alternative 4 please.

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mike yancey inside Clark County (on forum)

September 3, 2015, 11:58 PM

## 2016 Comprehensive Plan Proposed Alternatives Analysis

What are your thoughts on the 2016 Comprehensive Plan proposed alternatives analysis?

This is another power play by David Madore to get what he wants in this county ,total control over the county.

1 Supporter

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Name not available (unclaimed)

August 11, 2015, 7:17 AM

Well I certainly think Alternative four is not a good choice at all. It would certainly create rural sprawl. This is not a viable alternative in any way, shape, or form. There is not enough infrastructure to support it. Property owners may think they want it, but wait until it happens and see who the first people to complain are. You like your peace and wide open space don't you?....that will be all gone people....Really a bad bad idea...

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Name not available (unclaimed)

August 6, 2015, 7:52 AM

Table the entire Plan until a THOROUGH study has been done on long term effects of URBAN SPRAWL in rural Clark County. (Environmental is only a small part of the total effect on the land and resources!)

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Name not shown inside Clark County (on forum)

August 6, 2015, 7:15 AM

Alt 4 should be tossed. It was drafted by a non-union employee which is in violation of contracts. Otherwise Alt 2 appears to have a good balance and the biggest concern we have is ground water protection of small personal wells due to sprawl.

2 Supporters

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