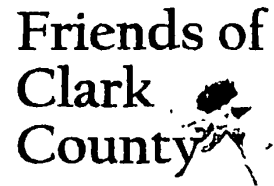




Friends of Clark County  
P.O. Box 513  
Vancouver, WA 98666  
[friendsofclarkcounty.org](http://friendsofclarkcounty.org)

RECEIVED  
MAY 17 2016  
BOARD OF  
COUNTY COUNCILORS



To: **Board of Clark County Councilors  
Clark County Planning Commission  
Community Planning  
Kathy Schroader**

**May 17, 2016**

**For the record: Evaluation of the Preferred Plan: Minimum parcel size for rural and resource land and clusters.**

**Lowering the minimum parcel size for Resource Lands, Title 40.210**

Friends of Clark County (FOCC) supports the 2007 Growth Management Plan (the former Alt 1) as congruent with state statutes, more than adequate for the estimated population and affordable. The current Preferred Alternative may be incongruent, un-necessary and unaffordable. There are several problems with the county-wide lowering of the minimum parcel size for rural and resource lands proposed in the Preferred Plan, Title 40-210. The countywide nature of the rezoning should not pass either the WWGMHB or the courts. Making countywide zoning changes to resource lands without a full EIS should not pass either the WWGMHB or the courts.

Also, state statute demands that the county enhance, protect, conserve and promote use of resource lands. Lowering the AG-land minimum parcel size to 10 acres will affect their ability to function as resource lands and can be seen as functional de-designation of the land for some farming functions. A 10- acre parcel is too small for any AG that needs large machines and is too small for commercial berries, orchards, livestock (especially pigs), and other kinds of dry-land farming (e.g. grains, hay).

Further, state statute requires that you show your work, including showing the need to increase the number of parcels in resource lands. There are several issues here. First, Preferred Plan zoning changes for the rural areas are already making it easier/less expensive/less public for landowners to rezone and divide their rural parcels, which will increase the number of small rural lots and increase buildable parcels. This is on top of the already large # of buildable parcels in the rural area. Please ask Community Planning how many parcels were added to the rural area when Judge Poyfair threw out AG/Forest category proposed for resource lands and

returned those parcels to rural lands. It can be argued that there are already a plethora of rural parcels and that there is no need to attack resource lands.

### **Clusters: Title 40.210.010**

FOCC holds that housing clusters taken out of the resource parcels, set up a conflict situation between residents of the houses and the use of the resource land and, if proposed, should be subject to several conditions.

The County is proposing clusters on resource agricultural (AG) and forest (FR) lands.

First, we are told by state statute to enhance, protect, conserve and promote use of resource lands. Putting a cluster of houses into resource land sets up a conflict between the owners of the houses and the farmers on the remainder parcel.

Houses, clustered or not, adjacent to farms do not enhance, protect, conserve and promote agricultural land and its use. The larger the cluster, the more power the house people will have to curtail the use of the AG land for farming.

Further some resource lands actually do have the recommended protective buffers. The proposed clusters are taken out of the resource land itself and **inside of the** buffer. Clusters are "buffer-busters, which effectively remove the protection of the buffer.

This conflict between houses and farming activities will remain. Even if all of the below protections of the remainder are included in the Preferred Plan.

Further some resource lands actually do have protective buffers. The proposed clusters are taken out of the resource land itself, not the buffer parcels. This puts houses inside of any buffers, effectively negating the former protection of the buffer.

Second, If you must cluster, FOCC proposes that:

That following WAC 365 196 815, Section 3 A, the cluster houses be only on land not suitable for farming and the parcels will be only 1 acre.

Clusters will be allowed only where there is public water to prevent de-watering of existing wells on either the remainder or on neighboring parcels.

Clusters will be placed adjacent to each other along a public road, rather than within the remainder. This protects the remainder, increases access for emergency response and decreases school bus stops.

The remainder deed will contain a codicil stating that the parcel is AG resource land and is not further divisible.

Each cluster deed will contain codicils that state the parcel is a cluster lot taken from AG or forest resource land and that 1) the parcel is not further divisible and 2) residents are in an agricultural zone and will be exposed to noise, smells, dust, lights, large machines and all of these at most hours as is permitted under the "right to farm" county law.

Thank you for accepting our input.

Sincerely,

A handwritten signature in cursive script that reads "Sydney Reisbick".

Sydney Reisbick, President  
Friends of Clark County  
For the GMA process record and the Preferred Alternative record.

## Schroader, Kathy

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**From:** Orjiako, Oliver  
**Sent:** Wednesday, May 18, 2016 4:38 PM  
**To:** Albrecht, Gary, Alvarez, Jose, Anderson, Colete, Euler, Gordon, Hermen, Matt, Kamp, Jacqueline, Lebowsky, Laurie, Lumbantobing, Sharon, Orjiako, Oliver, Schroader, Kathy, Wisner, Sonja  
**Subject:** FW: Comp Plan Testimony (5/17/16 BOCC hearing)  
**Attachments:** 051716\_CompPlanComments\_Carol\_Levanen.pdf, 051716\_CompPlanComments\_Sydney\_Reisbick.pdf, 051716\_CompPlanComments\_Susan\_Rasmussen.pdf, 051716\_CompPlanComments\_Richard\_Dryland.pdf

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

FYI and for the record. Thanks

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

From: Tilton, Rebecca  
Sent: Wednesday, May 18, 2016 2:39 PM  
To: Orjiako, Oliver, Schroader, Kathy  
Subject: Comp Plan Testimony (5/17/16 BOCC hearing)

Hello,

Please see the attached comments, which were submitted at the board's hearing yesterday (during public comment)

Thanks!  
Rebecca

Rebecca Tilton, Clerk of the Council  
Board of County Councilors  
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Vancouver, WA 98666-5000  
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