

Schroader, Kathy



From: Karen Wood <kwood@pacifier.com>
Sent: Tuesday, May 24, 2016 3:54 PM
To: Cnty 2016 Comp Plan
Subject: Re: Final SEIS Comments

After submitting below comments earlier today, I decided to try to understand the difference between my "over 5,000 new parcels on resource lands" and the "over 8,000 new parcels" I saw in the Final SEIS. After some digging, I am confused and uncertain about the impact of changing AG-20 to AG-10, FR-40 to FR-20, and some R-20 to R-10.

On page 1 of Issue Paper 8.1, under Summary-Comprehensive Plan and Zoning Map Amendments-Rural, it says in Item 2 that 2,571 parcels zoned AG-20 will change to AG-10. Item 3 says 2,499 parcels zoned FR-40 will be change to FR-20. Adding those two numbers together is how I came up with "over 5,000 new parcels on resource lands." These numbers seem to be supported by the long list of parcel numbers in Table 1 of Issue Paper 8.1.

In the Final SEIS, on Page 1-6, Table 1-2 says 8,024 parcels will be created by the 2016 preferred alternative. But it also says the net change between the 2016 Preferred Alternative and Existing Conditions 2007 Comprehensive Plan is only 985 new parcels. I see a footnote on Forest that it excludes property in the current use program for Timber and Designated Forest Land. Does that explain the difference between new parcels of 25 in Table 1-2 and 2,499 parcels in Issue Paper 8.1 for the Forest zone? And is it valid to assume that current use program parcels will not subdivide when the zoning is changed from FR-40 to FR-20? Is there a similar explanation for the difference between 842 new Agriculture parcels in Table 1-2 and 2,571 parcels in Issue Paper 8.1?

I'm sure I just haven't done enough digging or I'm misinterpreting information, and I'm sure planning staff would have a quick explanation for the differences between Issue Paper 8.1 and Table 1-2 of the Final SEIS related to new parcels created by the minimum lot size reductions for AG, FR, and R. But I'm left with a nagging feeling that I don't really know the impact of the changes on rural land parcels.

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

From: [Karen Wood](#)
To: comp_plan@clark.wa.gov
Sent: Tuesday, May 24, 2016 12:44 PM
Subject: Final SEIS Comments

In my previous comments on the 2016 Comprehensive Plan update, I shared the many concerns I have about reducing lot sizes outside urban growth boundaries. So I was disappointed with the BOCC preferred alternative decision on February 23, 2016, to change the minimum lot size for resource lands from AG-20 to AG-10, from FR-40 to FR-20, and from R-20 to R-10 for some parcels. Allowing the subdivision of resource lands does not protect them as required in the Growth Management Act. I don't think proposed clustering provisions for these lands mitigates the fact that they will be less useful as resource lands if there is a second home built on them. The lot size reductions are unnecessary as there are already ample rural lands available to meet projected rural population growth in the next 20 years.

I have been following and commenting on this comprehensive plan update since the first scoping open house in August 2014. I think it is unfortunate that this update has been used to allow more growth in rural areas outside of the urban growth boundaries when population projections do not support it. With no need to increase urban growth areas, it would have been better for Clark County and its citizens if the BOCC had used this update to pursue policies that would both preserve resource lands and also provide financial benefit to rural land owners such as transfer of development rights, conservation easements, and sale of development rights that were discussed in the Conserving Food Production in Clark County document that I picked up at an open house. Instead we have spent much staff time and taxpayer money on an update that is likely to be challenged in court due to its impact on resource lands and rural character. Creating over 5,000 new parcels on resource lands without a population estimate to justify it, and which results in a \$158 million shortfall for transportation, is not in the best interest of Clark County citizens who want a good quality of life and don't want their taxes raised to cover infrastructure costs for development on rural lands.

As summarized in the Final SEIS Summary of Impacts of the Preferred Alternative, there are cumulative environmental impacts from the preferred alternative due to creation of over 8,000 new parcels. There are also potentially prohibitive infrastructure costs related to transportation. I hope the BOCC will reconsider the decision to allow more subdivision of land in the rural areas.

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