

Schroader, Kathy



From: Heidi Owens <heidi owens@comcast net>
Sent: Wednesday, May 25, 2016 3 38 PM
To: Cnty 2016 Comp Plan
Subject: Comments for 2016 Comprehensive Plan Update for Planning Commission and BOCC consideration
Attachments: 2016 Comp Plan jt hearing comments docx, Rural capacity GIS data pdf

Please find two attachments for review and consideration by both the Planning Commission and the BOCC

- 1) Additional comments for consideration of the 2016 Comp Plan
- 2) Rural Capacity Data from GIS

Thank you and regards,
Heidi Owens

To Board of Clark County Council, Honorable Marc Boldt, Chairman
Clark County Planning Commission, Mr Steve Morasch Chair
Dr Oliver Orjako, Director of Community Planning
From Heidi Owens, Resident City of Vancouver in Clark County, WA
Date May 25, 2016
RE Questions and Comments for Consideration on the 2016 Comprehensive Plan – for the record

Thank for the considering my comments and addressing my questions regarding the preferred alternative for the Clark County 2106 Comprehensive Plan Update. In addition to previous comments I have submitted regarding this plan, I want to address some additional issues. As always I appreciate your service the residents of Clark County and encourage you to follow the Growth Management Act of Washington.

RURAL ELEMENT – RURAL DESIGNATION CHANGE

What is the basis for changing the comprehensive plan map from the three RURAL designations (R-20, R-10, and R-5) to one rural designation? This change will modify the procedural process for development proposals from a Type IV to a Type III process. I have some specific questions around this change.

- What are the approval criteria to be used for development on the rural properties by the hearing officer?
- How is this change consistent with RCW 36.70a.070(5) which states that the Rural Element achieve a variety of rural densities and reduce the inappropriate conversion of undeveloped land into sprawling, low-density development?
- Is there consistency between the capital facilities plan and transportation to accommodate the full development of these rural properties under one zoning type? In other words, has the need for rural services been adequately addressed under this change?
- How was this change studied as part of the SEPA process and is it included in the FSEIS? If so please highlight where and show the impact on water resources and road congestion.

The submitted Rural Capacity table (from Clark County GIS) can be used to calculate the potential number of additional home sites (over and above what is possible under the 2007 plan). Using this table, I computed that an additional 4,121 additional parcels could be developed through a Type III process seeking development on 5 acres. The preferred alternative already provides 3189 more parcels than needed. In fact, if the rural area was left alone and maintained at 2007 plan levels, there would be enough potential home sites to accommodate the expected growth in the rural areas. Once one property is allowed to develop into smaller parcels, it will open the flood gates for others to follow suit. The result will be in direct conflict with the goals of the Rural Element to provide capacity for future growth and buffer resource activities.

Furthermore, the change is really less about the potential upzoning of properties and more about circumventing GMA. This designation change introduces a Quasi-judicial process for comprehensive plan changes and is in direct violation of RCW42.36.010.

AFFORDABLE HOUSING

Where are the actual incentive programs for building affordable housing throughout the county?

KUDOS

I commend the inclusion of goals from the Growing Healthier Report and the Aging Readiness Plan. Supporting the counties growing senior population is the right thing to do both on a moral/ethical basis and an economic one. Allowing residents to age in their community and feel supported adds to the robustness of the community – I believe that support of these policies shows great respect to all citizens because otherwise residents will be essentially exported. Do we want to see Clark County become a place where seniors are expected to leave? Furthermore, the Growing Healthier Report provides sensible goals to help create a more sustainable, livable community. Again these goals support our long-term economic strength. Thank you for including and supporting these goals.

LONG-TERM LOSS OF RESOURCE LANDS

Please look at the 1979 Clark County Comprehensive Plan Map. It is in the record. Notice how much more Ag land and Forest land was in the county at that time. In 1994, when Judge Poyfair denied the use of an AG-FOR designation, this 30000+ acres was rezoned R-10, R-20 and some R-5. The R-10 and R-20 zones were intended to buffer the resource lands. The county continues to lose Ag land at a staggering rate – 600 acres for the Rural Industrial Land Bank, 111 acres for Ridgefield. Agriculture is alive in Clark County and needs to be supported. Since 1994, TDRs and PDRs have been listed as a tool to support agriculture in the County's Comprehensive Plan. Where are they? Why have they never been piloted or tried?

The argument that GMA took away land from land owners in 1994 does not hold up. Yes, there were people who were zoned AG that were on smaller acreages, particularly South East of Battleground. However, many property owners gained much more flexibility on their land with the elimination of the AG-FOR designation. Please see earlier testimony by me that shows that sharp decline in Ag land since 1980.

FARMING & WATER

Please think hard about what it takes to Farm. Some Farming can occur in dry situations, however, many crops depend on water. Do you believe that farmers who lose access to their well water or who do not have well water can farm with Public Water and make a profit?

FOREST TIER 1 – UPZONE

Table 1-2 on Page 1-6 of the FSEIS shows a net change of 25 parcels for the Forest zone change from FR-40 to FR-20. The footnote on this table explains that the Forest parcel counts excludes properties in the Timber or Designated Forest Land Current Use Program. Has the number of potential lots been counted

if those current use restrictions were removed from the property? Based on data available from 2014, a current count would be available from GIS, there are 355 properties currently zoned FR-40 and in current use that are 20 acres or larger, affecting almost 19,000 acres (see Table 1 below) What would be the impact if these owners decided to log their property and then subsequently remove it from current use to divide into 20 acre parcels? Furthermore, where are the guidelines in revised Title 40 that restrict a property owner from putting clusters on Forest property that is in current use TIM or DFL? It seems that the count of potential 25 parcels is inaccurate As shown in the following table, from GIS Data, the potential for straight divisions or clustering is greater than 25 properties, unless Title 40 restricts that based on current use? Please show the analysis of the number of Forest Properties that could divide if current use is not considered And, was this considered in the FSEIS?

Table 1 Forest 40 current use data, from point in time approx 2014

	Parcel Size	Total #	Acres	DFL	TIM
		2,405	29,672	343	520
FR-40	>=80	31	3,385	11	2
	>=40	151	9,080	72	19
	>=20	557	18,960	204	151
	>=10	895	23,386	249	321
	>=5	1,736	28,257	313	486
	<5	669	1,415	30	36

SUMMARY & CONCLUSION

In summary, I would suggest that the Comprehensive Plan Map not be changed to eliminate the three rural designations R-20, R-10, and R-5 Furthermore, I would recommend that the county not do across county rezones of FR-40 to FR-20 and AG-20 to AG-10 I do not believe there is consistency between the potential growth from these changes with the capital facilities/transportation plans

Thank you for your consideration of these important issues

Rural Statistics - Counts and Potential Capacity*

Preferred Alternative Zoning	Rural Residential Classification	Number of Parcels	Total Acres	Existing Housing Units	Number of Dividable Parcels	Potential New Housing Units	Potential Developable Acres
R-10	Built	212	736	220	0	0	0
	Built w/Constraints	1,451	8,206	1,530	0	0	0
	Excluded	187	852	65	0	0	0
	Rural Residential Vacant	58	410	3	3	62	410
	Rural Residential Vacant w/Constraints	651	8,593	134	127	869	8,593
R-10 Total		2,559	18,797	1,952	130	931	9,002
R-20 to R-10	Built	20	50	21	0	0	0
	Built w/Constraints	114	715	127	0	0	0
	Excluded	18	118	0	0	0	0
	Rural Residential Vacant	5	26	0	0	5	26
	Rural Residential Vacant w/Constraints	118	2,362	35	41	205	2,362
R-20 to R-10 Total		275	3,271	183	41	210	2,388
R-20	Built	13	53	14	0	0	0
	Built w/Constraints	274	1,853	292	0	0	0
	Excluded	25	252	0	0	0	0
	Rural Residential Vacant	5	22	0	0	5	22
	Rural Residential Vacant w/Constraints	112	1,720	17	6	118	1,720
R-20 Total		429	3,899	323	6	123	1,741
Grand Total		3,263	25,967	2,458	177	1,264	13,132

*This table provides parcel counts and results of the Rural Capacity Analysis for properties in current and proposed zones for the 2016 BOCC Preferred Alternative

Source Clark County GIS - Preferred Alternative Rural Capacity yields

Date May 2016

Data location Q:\Projects\conSrvs\CommDev\20123\2016 plan update\PreferredAlt_BOCC\DataRequest