

Appendix A. Public Comments on the DSEIS

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Appendix A

Comments on the DSEIS with Responses

Comments on the DSEIS were received by mail, e-mail, and online. Many of the comments share similar concerns. For example, a number of commenters requested additional time to review the DSEIS.

Comments specifically on the DSEIS (the alternatives, planning assumptions, principles and values, and environmental analysis) and responses to those comments are included in this appendix to the FSEIS.

All comments are listed in the table alphabetically by commenter, with responses in the corresponding row. All comments regardless of content were forwarded to the Board of Clark County Councilors.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
164	Alan Greene	9/16/15	1	Alternative 4 to the Comprehensive Growth Management Plan Update is the only possibility for rural landowners to gain equal treatment from the oppressive private property limitations of the 1994 Growth Management Act.	Alternative 4 from the DSEIS is no longer being considered. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.
164	Alan Greene	9/16/15	2	We agree with the proposed changes in Alternative 4 except as applies to our family parcels No:230277-000 and 230282-000 situated in Section 5, T 4NR3EWM. We respectfully request that the Alternative 4 data and the Alternative 4 map please be modified to include Parcel Nos. 230277-000 and 230282-000 to be zoned as 5 acres or as FR-10, NOT FR-20. We believe that Parcel Account No. 230282-000 is a legal lot or parcel as it was established as a separate parcel in 1948. Our parcels Nos. 230277-000 and 230282-000 total slightly more than 50.5 acres and are situated near Yacolt Mountain. Prior to the Growth Management Act in 1994 our parcels were zoned R-5 and the parcels owned by our neighbors to the North were zoned R-20. The 1994 Growth Management Act changed our zoning to FR-40, meaning that we can only build one home on 40 acres for one family member.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. A property owner may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
164	Alan Greene	9/16/15	3	We have waited for more than 20 years to be able to hope for some reduction of the restrictions placed upon our land by the Growth Management Act. There are 5 children in our family who live in Washington State. Each of them should be allowed to build a home on the family property and manage each of their properties as one tree farm to grow and produce commercial timber. We should have the right to build our homes on our own land, but with that right some of us may choose to build while others may choose not to build. Just because a parcel is created does not mean that a person will actually build a home upon every parcel created. We believe it would be unequal treatment and an uncompensated taking of the use of our property if Clark County attempts to prohibit our sons and daughters from building homes on the property which has been owned by our family for 60 years. We should not be penalized because we chose to grow timber and did not choose to create 5 acre parcels in 1993. We should be allowed to have the same use of our land as our neighbors have and be able to build our own homes and live on our own land. This means that each family member who chooses to own a portion of the 50 plus acres could own separately their own deeded acreage, not an undivided deeded interest in 50 acres owned jointly by all family members. Zoning to allow our family to build family homes on an undivided deeded interest in 50 acres is not feasible. Residential mortgage lenders have told us that a mortgage loan for a residential home must include on the home loan documents all owners of the land upon which the home is to be built. This would mean every landowner would have to sign on the mortgage documents to be liable for each sibling's home to be built on the undivided land. This would lead to horrific conflicts between family members. We believe that Pomeroy Farm avoided this conflict by segregation into 20 acre parcels for each family member.	It is not within the purview of this programmatic SEIS evaluate the effects to individual parcels. Property owners have the ability to request zoning changes from the County and are reviewed on a case-by-case basis. In order to be able to subdivide a 50-acre parcel into 5 separate parcels, the zoning would have to change from Forest to Agriculture or Rural.
164	Alan Greene	9/16/15	4	Alternative 4 proposes that the parcels owned by our neighbors to the North become zoned FR-10. We believe an omission occurred when our parcels were not also proposed in Alternative 4 for FR-10 zoning. The parcels adjacent to our property are "predominant lot sizes" of 1.5 acre and 5 acre parcels with homes. There are more than 12 homes on property adjacent to or near our property. These parcels are proposed in Alternative 4 to become zoned FR-10. Our property and the property of our South and East neighbors border on and have direct access to a public road, Yacolt Mt. Road. The homes on these "adjacent properties" are visible from our property and from Yacolt Mt. Road and show the "actual rural residential character" of this local area. The property of our neighbors to the West and North of our property are 20 acre and larger acreage parcels with some 5 acre parcels and are proposed under Alternative 4 to become zoned FR-10. Several of these parcels do not border on any public road, whereas our property has more than one-half mile of road frontage. As explained, our property is situated next to several small parcels with rural residential homes. Our Parcel Nos. 230277-000 and 230282-000 should be included in Alternative 4 to be zoned as 5 acres or as FR-10, NOT FR-20.	It is not within the scope of this SEIS or the 2016 Comprehensive Plan Update to make zoning changes to individual parcels. Alternative 4 from the DSEIS is no longer being considered. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.
164	Alan Greene	9/16/15	5	We shall continue our major goal of growing timber on our land, but we want to live on our own land so that we can thoroughly and attentively manage our land as one timber management unit. It is possible that the acreage devoted to timber production would not be reduced by our family homes. We shall ensure that we have minimal environmental impacts upon the land and could build our homes on that portion of the land upon which conifer timber will not grow because of laminated root rot soil which kills conifer trees. We have areas where laminated root rot is prevalent and have been unsuccessful in our efforts to achieve Douglas fir reforestation in those areas. Please see the attached information from the US Forest Service which explains the open areas in forests created by laminated root rot.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
037	Alec Baker	9/16/15	1	I Support Alternate 4	Thank you for your comment.
039	Andrew Reule	9/16/15	1	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.	Alternative 4 from the DSEIS is no longer being considered. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative. The methodology for determining the number of potential parcels that could be created under the Preferred Alternative can be found in Appendix B.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
039	Andrew Reule	9/16/15	2	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 quifer depletion, especially as it relates to surrounding wells.	Alternative 4 from the DSEIS is no longer being considered. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative. Please also see Chapters 3 Water Resources and 8 Public Utilities and Facilities for additional information on water supply.
039	Andrew Reule	9/16/15	3	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.	It is true that cluster development would not reduce the volume of water withdrawn from a development compared to one that is not clustered; however, the mitigation was proposed as a measure to minimize the amount of infrastructure needed and to reduce to the overall footprint of development in rural areas. Any new development would increase the demand for water resources in Clark County.
039	Andrew Reule	9/16/15	4	Due to the sprawling development pattern promoted by Alternative 4, a more thorough analysis of carbon emissions and air pollution is necessary.	At this time, climate change analysis is not required under SEPA. Alternative 4 from the DSEIS is no longer being considered. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.
039	Andrew Reule	9/16/15	5	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.	Alternative 4 from the DSEIS is no longer being considered. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
038	Ann Foster	9/16/15	1	<p>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).</p> <p>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:</p> <p>Based upon 2015 numbers to-date, these 5 market locations are generating a total of just over \$5,000,000 dollars in TOT AL sales. The total number of attendees over the course of a given farmers market season is in the hundreds of thousands.</p> <p>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.</p> <p>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.</p> <p>In addition to generating dollars that remain within the local (i.e., 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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.
040	Anna Waendelin	9/1/15	1	<p>For the record, I'm totally against Plans 2 and 4 and in support of Plan no. 1 (no changes) We don't need any more urban sprawl. We need to keep our agricultural areas away from greedy developers.</p> <p>The charm of living in this area is the natural and agricultural areas and open spaces so close to the city. Let's not destroy it by voting for plans 2 or 4.</p> <p>Please endorse Plan no. 1</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.
117	Anne Lawrence	9/17/15	1	Attached are my written comments re: the Comprehensive Plan update of 2016.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
007	Anonymous	8/11/15	1	Well I certainly think Alternative four is not a good choice at all. It would certainly create rural spawl. This is not a viable alternative in any way, shape, or form. There is not enough Infastructure 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 dont' you? ... that will be all gone people ... Really a bad bad idea ...	Thank you for your comment. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.

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Letter ID	Name	Date	Comment Number	Comment	Response
008	Anonymous	8/6/15	1	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!)	The County has been vetting alternatives for the Comprehensive Plan update since they started the update process in 2014. The County is obligated by law to update its Comprehensive Plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension. A sprawl assessment is not required under SEPA, but a general discussion of sprawl as it relates to the project is provided in Chapter 6.
009	Anonymous	8/6/15	1	Alt 2 appears to have a good balance and the biggest concern we have is ground watr protection of small personal wells due to sprawl.	Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative. Additional information regarding water quality and water supply has been added to Chapters 3 and 8 of the FSEIS, including information from the Washington State Department of Ecology and Clark County Public Utilities.
009	Anonymous	8/6/15	2	1 Supporter	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
010	Anonymous	9/4/15	1	Alternative 4 please.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
012	Anonymous	8/6/15	1	Alt 4 should be tossed. It was drafted by a non-union employee which is in violation of contracts.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
012	Anonymous	8/6/15	2	Otherwise Alt 2 appears to have a good balance and the biggest concern we have is ground watr protection of small personal wells due to sprawl. 2 Supporters	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
013	Anonymous	9/11/15	1	Alternate One Best!	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
009	Anonymous	8/16/15	3	Alt 4 should be tossed. It was drafted by a non-union employee which is in violation of contracts.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
112	Avaly Scarpelli, Janice Hall, John McKibbin	9/17/15	1	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 (OMA) 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 County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension.

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Letter ID	Name	Date	Comment Number	Comment	Response
112	Avaly Scarpelli, Janice Hall, John McKibbin	9/17/15	2	<p>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.</p> <p>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.</p> <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
112	Avaly Scarpelli, Janice Hall, John McKibbin	9/17/15	3	<p>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.</p>	The planning assumptions used in development of the 2016 Comprehensive Plan update were vetted through extensive analysis and deliberated by the BOCC in a series of workshops. Additional information on the process and the planning assumptions can be found on the County's website at: https://www.clark.wa.gov/community-planning/process-and-documents
112	Avaly Scarpelli, Janice Hall, John McKibbin	9/17/15	4	<p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
112	Avaly Scarpelli, Janice Hall, John McKibbin	9/17/15	5	<p>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.</p> <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
129	Barbara Coppedge	8/23/15	1	<p>Please see attached letter and exhibits.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
041	Bianca Benson	9/17/15	1	<p>As a rural farm owner and a Friend of Clark County, I find the DSEIS lacking in the planning for ground water. Our home is under strict water usage which makes farming a complicated endeavor. We've had to resort to water storage and, while prudent, is still subject to ground water availability. With more large homes on oversized, paved lots in our rural lands each one of us is at risk of loosing our water, including the home owners. The environmental impact of thousands of more homes in our rural county will create hardships in the future that are not being carefully calculated now.</p>	It is true that groundwater aquifers are the primary source of water for Clark County. Development projects that propose to impact water resources are regulated by local critical areas codes and state regulations governing water quality. These regulations require impacts to be avoided and minimized, and unavoidable impacts require compensatory mitigation. These measures help to ensure no net loss of ecological functions on an individual project scale. Additional information on water supply has been added to Chapters 3 and 8 of the FSEIS.
041	Bianca Benson	9/17/15	2	<p>We support Alt no. 1 The more unstable the world becomes, from any of several possible disruptions, the more we should have wisdom at the community level to build in alternative food system scenarios as a resiliency factor...protection of food and water.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

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Letter ID	Name	Date	Comment Number	Comment	Response
042	Bill and Ann Perrin	9/17/15	1	<p>Recently, Battle Ground School District (BGSD) decided to sell their "surplus" properties. One of these properties, located just North of WSU off 174th St., was the impetus for bringing our area into the UGB.</p> <p>The property is currently zoned "public facility", but BGSD indicates they wish to sell off 5-acre parcels. Our property borders the BGSD property and our neighborhood association, (Pleasant Valley Rural Ranch Association), is composed mostly of residents who border BGSD property as well.</p> <p>From 2005-2008, we were part of a community planning effort working with the County, BGSD, local landowners and neighborhood associations. Our vision and community plan was developed because BGSD requested the County bring BGSD property into the UGB to build a school. This planning resulted in the Mill Creek Sub-Plan the County developed.</p> <p>Although we support the Community Plan, if BGSD no longer intends to build a school, then our area neighborhood along with the BGSD property does not need to be in the UGB.</p> <p>We request our area be removed from the UGB and returned to its original zoning. The City of Vancouver also questioned why the area was brought into the UGB as it cannot meet the density requirements.</p> <p>We would still like to continue work with the County on the Mill Creek Sub-Plan and use our area as a model for urban/rural buffer and good community "design with the land" planning.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
047	Bill Baumann	9/9/15	1	I want Clark County to be farmer friendly and have policies that help increase the amount of Clark County grown food. I do not support Alt 2 or Alt 4's removing AG-20 or the creation of R-1 and R2.S outside of the Rural Centers. Please consider Slow Food Southwest Washington's position statement on the Comprehensive Plan and conserve farm land and strengthen the farm economy.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
025	Bobbie White	9/5/15	1	My husband and I moved to Clark County in mid-May this year after being away from the Portland/Vancouver area for twelve years. As you can imagine, we are shocked by the increased amount of traffic coming and going over both the Interstate bridge and the I 205 bridge. Therefore, Alternative #4 should not even be on this list until the WA/OR transportation plan is seriously addressed!	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
025	Bobbie White	9/5/15	2	#3 looks like the best alternative at this point to create more area for the cities of Battle Ground, La Center, Ridgefield and Washougal to expand and promote business development since "no-action" would still create more lots without specifically addressing the needs of these towns.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
024	Brad Fresch	9/4/15	1	My preference is Alternative 4.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
024	Brad Fresch	9/4/15	2	I don't like Alternative 3 at all.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
048	Brian Clarke	9/13/15	1	<p>I own a small tree farm in North of Battle Ground. I have been trying to keep up on the Clark County Comprehensive Plans. I will not say I truly understand it all but I do I request Alternate 4 be considered/ passed.</p> <p>I would like to state that tree farmers as a "grouping" of people; are true stewards of the land (i.e. planting trees, water\ management, weed control, etc.). If we do not care for the land our trees will not grow. Additionally many of us allow the public to use our lands.</p> <p>We, (my wife and I) have no plans on developing our lands. Our plans are to pass this property off to our children and future generations. However that is our choice. The choice of development or not should be that of the land owner. It is our property. It is our risk. What I mean by risk is, as I see it, people in Vancouver do not want us to develop "our" lands (for their personal reasons). I bought this property as an investment and something to pass on to my children. If I lose this investment and investment opportunity(s); for example by wild fire or by not being able to develop; will the people in Vancouver reimburse me for my loss?</p> <p>If individuals or groups of individuals want to preserve large plots of land, I know of a few tree farms for sale they can buy and place into land trusts. That would be really really cool and I would personally thank them, for "putting their money where their mouth is". But that is their choice. Please allow me to make my choice for my land and my family .</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

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049	Bridget McLeman	9/16/15	1	<p>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.</p> <p>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.</p> <p>"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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
049	Bridget McLeman	9/16/15	2	<p>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.</p> <p>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.</p> <p>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.</p>	Impacts assessed at the programmatic level tend to be more general due to lack of knowledge about specifics regarding how the development would actually occur. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
046	Bryon Bestul	9/16/15	1	<p>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 XXXX and XXXX). 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.</p> <p>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.</p> <p>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.</p>	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. Property owners may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
051	Byron and Nita Countryman	9/17/15	1	<p>We are owners of tax lot XXXXXX (21 acres), east of Hockinson, a parcel of the original 160-acre Ahola Homestead. Current zoning on this forest land - since the 1994 ruling -- is for a 40-acre minimum lot size.</p> <p>Of the 21 residential lots adjoining this 160-acre homestead, all but two are between 2.5 acres and 7 acres in size. (The two exceptions are 10 acres and 29 acres.)</p> <p>The owners of the tracts on the Ahola homestead should be allowed to divide our land into lots comparable in size to those properties that adjoin our land--if we so choose.</p> <p>Eight Ahola family members (direct descendents of Al and Ruth Ahola) own the homestead property comprising ELEVEN tax lots, only one of which is over 40 acres. The one lot that is more than 40 acres is coowned by three sibling sisters; the co-ownership of this lot (49 acres) is just a stop-gap measure, caused by the current restrictions which prevent the three sisters from legally dividing their owned acreages into three individual lots. Overall, we siblings wish to have the legal option to sell or gift some acreages to our children or grand-children. A reduction from the 40 acre minimum lot size would help to ameliorate our situation.</p> <p>Our recommendation: For the Forest areas immediately east of Hockinson, zoning as a 5 acre minimum makes sense. Perhaps, a 10 or 20-acre minimum Forest zoning is practical in commercial forest areas of North Clark County. However, a 20 or 40 acre parcel is rare in the Hockinson area-as has been already noted by Clark County planners. We feel the Growth Management Plan should consider each parcel by neighborhood density when zoning for Forest Reserve. As noted above, many lots surrounding the Ahola homestead are currently in 5-acre size, or less. In fact, the predominant parcel size of properties surrounding the Ahola homestead quarter section had been 5 acres before the Growth Management zoning changes of 1994.</p> <p>A 5 acre minimum lot size would be the best - and most equitable -- option for the family-owned forest properties east of Hockinson.</p>	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. Property owners may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
015	Carl and Colleen Keller	9/16/15	1	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.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
015	Carl and Colleen Keller	9/16/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
015	Carl and Colleen Keller	9/16/15	3	We oppose Alternative 2 for much the same reasons.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
015	Carl and Colleen Keller	9/16/15	4	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 .	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
015	Carl and Colleen Keller	9/16/15	5	We also have no objection to the no-action alternative that would maintain the existing 2007 Comprehensive Plan.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
015	Carl and Colleen Keller	9/16/15	6	<p>Our principal concerns of the current growth management plan draft EIS, on which a preferred alternative should be selected, are:</p> <ol style="list-style-type: none"> 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. 	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
015	Carl and Colleen Keller	9/16/15	7	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.	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
052	Carl and Colleen Keller	9/16/15	1	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.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
052	Carl and Colleen Keller	9/16/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
052	Carl and Colleen Keller	9/16/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
052	Carl and Colleen Keller	9/16/15	4	<p>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.</p> <p>Our principal concerns on the current growth management plan draft SEIS, on which a preferred alternative should be selected, are:</p> <ol style="list-style-type: none"> 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. <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
036	Carla Kelly	9/17/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
036	Carla Kelly	9/17/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
004	Carol Levanen	8/17/15	1	This informational document regarding SEPA and EIS explains that the Lead Agency is responsible for the information in an EIS. They are the agency who determines any adverse environmental impacts of any project and shares it with other agencies. In Clark County's case, that agency is Community Planning. Therefore, if adverse impacts are claimed for Alternative 4, it is because that lead agency has made that decision. To have spent \$140,000 of taxpayers money to send the EIS to a company called ESA, to only have them say what staff wants said, is a waste of money. Staff could have just as well said it here in Clark County, Nonetheless, their information is incomplete or inaccurate and paints a picture that all's well with a do nothing plan. That picture couldn't be further from the truth.	Thank you for your comment.
135	Carol Levanen	8/17/15	1	5,749 students graduated fro Clark County High Schools in 2015.	Thank you for your comment.
136	Carol Levanen	8/17/15	1	There were 5,559 High School graduates in Clark County in 2014.	Thank you for your comment.
138	Carol Levanen	8/31/15	1	Why is Smart Growth.org and New Urbanism.org on Clark County's web page?	These organizations are no longer linked to the County's website.
139	Carol Levanen	9/11/15	1	Rural Lands - Variety of Densities - 1-10 acres considered rural See pages 26, 27, 28, 29, http://www.lawseminars.com/materials/07GMAWA/gmawa%20m%2012%20Mackie%2011-12.ppt.pdf	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
174	Carol Levanen	9/17/15	1	<p>This informational document regarding SEPA and EIS explains that the Lead Agency is responsible for the information in an EIS. They are the agency who determines any adverse environmental impacts of any project and shares it with other agencies. In Clark County's case, that agency is Community Planning. Therefore, if adverse impacts are claimed for Alternative 4, it is because that lead agency has made that decision. To have spent \$140,000 of taxpayers money to send the EIS to a company called ESA, to only have them say what staff wants said, is a waste of money. Staff could have just as well said it here in Clark County, Nonetheless, their information is incomplete or inaccurate and paints a picture that all's well with a do nothing plan. That picture couldn't be further from the truth.</p> <p>http://www.ecy.wa.gov/programs/sea/sepa/citizensguide/citizensguide.htm</p>	The purpose of the DSEIS is to provide an analysis of the environmental impacts associated with the proposed alternatives. Clark County has not diverged from this purpose. It is not uncommon for public agencies to hire an outside consultant to document environmental impacts. Not only does an outside consultant provide a third-party view of the project, but often times consulting companies, with their larger staffs, bring technical knowledge that local governments do not have on hand. The County maintains its role as the decision maker and final reviewer of the document. Best available science was used for the creation of this document, and the County believes that its analysis is commensurate with the purpose and intent of programmatic EISs for comprehensive plan updates.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
175	Carol Levanen	9/2/15	1	<p>CCCU, Inc. has reviewed the record after the DSEIS was released to the public. There are three supposed testimony entries that have no name. It does not seem appropriate to include information that no one knows where it came from, into the record. All three items could have been submitted by the same person, and very likely they were. Is such testimony really a legal document that can be considered? If that is the case, one could pose as many people with a particular opinion.</p>	<p>The commenting process for the DSEIS is intended to be an opportunity for the public to comment on the merits of the alternatives and the adequacy of the environmental analysis before it is released in its final form (the FSEIS). It is not intended to be a means by which the lead agency counts the number of people for or against a particular alternative. Therefore, submitting a comment multiple times does not give it more weight or consideration than a comment that is submitted once. The reason the County asks that members of the public to only provide one oral testimony is so that everyone has the opportunity to speak during the hearing; there is no limit to the number of written comments a member of the public can submit, so long as it is submitted within designated comment period. However, it is highly encouraged that those who are taking the time to submit a comment also include their name. While comments submitted anonymously will be accepted and considered, those who submit them will not have standing with which to appeal the decision if they so desire.</p>
181	Carol Levanen	9/16/15	1	<p>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.</p> <p>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.</p> <ol style="list-style-type: none"> 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. 	<p>The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. You may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
182	Carol Levanen	8/27/15	1	<p>CCCU is carefully reviewing the colored maps to the DSEIS, and we are shocked over what we are seeing. Does this ESA company know what they are doing? The DSEIS text is so vague that, until one goes to the maps, one does not understand the impact of the changes. The Councilors need to scrub the data and demand scientific evidence to support the agriculture, forest and septic maps. Specifically on page 8 of the NRCS soils manual it states, Cinebar Series - These soils occur in the northeastern part of the county on hilly uplands and old terraces, which are dissected by many creeks and drainageways. The native vegetation is a heavy growth of Douglas fir Cinebar soils are among the highest producing timber soils in Clark County. "Most of this soil is used for Douglas fir." "This soil is used for Douglas fir" On the EIS maps, they designate the Cinebar soils as poor forest soils, which clearly demonstrate that the GMA requirement to use the NRCS Soil Manual was ignored. In the production charts of the Manual, one will see that the production capability of the prime soils of Hillsboro Loam for agriculture and Cinebar Loam for forest, is twice the production as the other soils. Yet, the county maps have those soils indicated as poor soil for the resource. In addition, the production rates in the NRCS Manual for soils, show that what the county indicates as prime soils for both agriculture and forest, is actually very low throughout the maps. The GMA intended that prime soil be used because the production rates are so much higher than other soils, and often as much a twice as high. The GMA mandates that preservation of resource land is for the purpose of making money well into the future. That is why it says that prime soil is to be determined first, as one cannot expect to be productive and make money in the resource, unless there is a good foundation for the crops. This is of most importance to any farmer or forester because they want to make money on the land. Before they buy land for the resource, they first look at the soil. This basic concept is what the GMA bases resource designations on. In reality, all soil can grow something, because that is what it does, but to call it something different than what it is and what the GMA has mandated in a Comprehensive Plan, is illegal.</p>	<p>The most recent available data was used for the analysis in Chapter 2: the 2009 USDA SURRGO dataset. This source has been added to Figure 2-1, and the text has been revised to increase clarity.</p>
188	Carol Levanen	8/30/15	1	<p>County staff is presenting this information to the public on Monday, August 31, 2015 This whole document needs to be thrown out as it has no place in the Comprehensive Plan. http://www.clark.wa.gov/publichealth/community/growing_healthy/documents/GrowingHealthierReport23Mar2012-1.pdf</p> <p>Growing Healthy - Planning for a Healthier Clark County - Clark County Public Health Advisory Council and Clark County Public Health - April 2012</p> <p>Clark County Citizens United, Inc. has just reviewed a document intended for the Clark County Comprehensive Plan, in a new element proposal called the Health Element. The Growth Management Act does not subscribe to such an element in it's directives, but staff is attempting to include it. Most of the information, people would subscribe to because it all sounds fluffy and nice. Who wouldn't want to encourage healthy living. But, hidden in the document is a very different story. The document says that if the county just makes people live in the cities, they would all be healthier. It claims that those not living there, don't have a "healthy foods store" in their back yard, so therefore. their health will suffer. In reality, homeowners commonly plant fruits and vegetables as part of the landscape or in pots or small gardens. They plant healthy foods they like to eat and only as much as they personally need. By comparison, rural children and adults are far healthier than urban families , because they also have lots of fresh air and natural exercise. By adding regulation to a Comprehensive Plan, doesn't mean it will happen. Trying to force people to walk, ride transit or ride a bike as a mode of transportation, is folly. In a free country, people decide what they want, as long as it is not illegal or immoral. The underlying theme and goal of this document is to "preserve" or lock up, rural land, prevent it's development, force people to live in the cities and increase density in urban areas. The creative way this document is written, shows the determination of the staff ,with it's agenda.</p> <p>One interesting passage was the way people, who will be manipulated, is phrased. It reads, "A key indicator of human capital is educational attainment. Dense human capital attracts more human capital. " So now we are all capital, or things or money to be exchanged. Those without a higher education are now of lesser value, than those with high degrees. This is hogwash. There are many Clark County residents who are very rich and successful business men and women, minus any college degree. This whole passage in the document is degrading. There is no difference between a high school graduate and a doctor, except years and a desire for a particular profession that requires those years.</p> <p>The following information are excerpt of the "Health Element" The Health Element of the Comprehensive Plan identifies important changes to our built environment... Food Deserts in Clark County -2011 - indicates that all areas outside the urban areas don't have access to healthy food.</p>	<p>The senate passed a bill in 2005 (ESSB 5186 and related bill SB 1565) that amended the GMA to require that communities create plans that promote healthy lifestyles. However, analysis of impacts to healthy lifestyles is not required under SEPA. Therefore, it is outside of the scope of this SEIS process.</p>
190	Carol Levanen	9/12/15	1	<p>Whatcom County rural lands policy - 5 acres and smaller - For the Public record and DSEIS review Please see: #23 - On September 9, 2011 , the GMHB order following remand from the Supreme Court ... found retention of rural zoning with density of one dwelling per 2 acres was compliant with the GMA because it was limited to areas which similar densities had already been established. RCW 36.70A.115 does not impose ... a needs or capacity analysis for areas outside UGAs - WWGMHBJO - ... does not require a rural lands analysis - Case# 07-2-0025c # 32 - ... limited to neighborhoods that have already been substantially developed, this will not lead to the "inappropriate conversion of undeveloped lands into sprawling, low density development. ... WWGMHB # 072-0018c Nov. 3, 2009 #33 - Washington State Supreme Curt - ... cannot base ... rural densities on a "bright line" rural density of one dwelling unit per five acres. 164 Wn 2d 329 190 P. 3d 38 2008 http://www.whatcomcounty.us/DocumentCenterNiew/4376</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
191	Carol Levanen	9/15/15	1	CCCU has uncovered a trail of land use policies intended for the Comprehensive Plan, under the guise of healthy living. The Food Systems Council Forum was just one of those underhanded ways to convince people that landowners must preserve their land and recombine it, for the sake of healthy living. Staff is continuously trying to incorporate that language in the Comprehensive Plan, so that regulation can be created to add to the layer of control the county has on rural and resource landowners and their lives. If you would visit Yacolt, Amboy and Hockinson schools, you will see very healthy, active and happy young children. This is in part because they live a rural life that incorporates outside activities and exercise that keeps them physically fit. In addition, they also have responsibilities to the land that incorporates good work ethics and a desire to be active. Artificial means of attempting to make people healthy don't work for very long, because there is no reward for their efforts. Rural children take care of their animals in a therapeutic and financial way. They work the ground for the same reason. They see the rewards of that work, day in and day out. They understand a responsibility to the welfare of their families and it is expected of them at a very early age. They can do all of the things that keep them healthy because they have living space that is conducive to that lifestyle. That is why one often hears people say they would love to buy a few acres in the country to plant a garden, have a few animals and raise their families. This is the ideal life, in many peoples minds. Forcing people close together and preventing them from realizing their dreams, stymies their desire to be healthy, both physical and mental health. They have no real reason to be healthy, because they are not doing anything that requires it. There's an old saying, "You can lead a horse to water, but you can't make it drink" All the "healthy" policies that are proposed for the county will simply go by the wayside. For people to want to be healthy, they have to have a thirst for something. Rural living satisfies that thirst and encourages people to remain healthy so they are able to enjoy it.	The senate passed a bill in 2005 (ESSB 5186 and related bill SB 1565) that amended the GMA to require that communities create plans that promote healthy lifestyles. However, analysis of impacts to healthy lifestyles is not required under SEPA. Therefore, it is outside of the scope of this SEIS process.
191	Carol Levanen	9/15/15	2	Alternative 4 is the only healthy alternative in the Comprehensive Plan and CCCU urges the Councilors to support it.as the chosen document to move on into the final planning stage.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
192	Carol Levanen	8/31/15	1	This 1996 WWGM Hearing Board Remand demonstrates that all of Judge Edwin Poyfair's orders were not followed. Instead, the Board isolated the remand to just Agri-Forest and Rural Centers and ignored action on the other orders handed down by the Superior Court. They timed this remand decision to happen just after the Court of Appeals decision of 1999, counting on CCCU's attorney not being available to protest the remand action .CCCU believes that the Clark County 1994 Comprehensive Land use Plan was the most corrupt process of any county in the state, except perhaps Seattle. The Plan in place today, is the same plan that was adopted in the rural and resource land in 1994, It has never been changed and after over twenty years, legitimate changes must be made. http://www.gmhb.wa.gov/searchdocuments/wwgmhb/1995/95-67complianceorderandinvalidityremand.pdf	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
193	Carol Levanen	9/11/15	1	For the record I would like to voice concern over Attorney, Christine Cook trying to stop me from giving testimony at the Joint Clark County Planning Commission/Clark County Councilor hearing, scheduled on September 10, 2015. As I approached the microphone and began to speak, she interrupted me to say that I gave testimony last week and I was allowed only one chance to give testimony, claiming Councilor Madore set that rule at the last hearing. I said I was representing an organization (which represents approximately 6,000 members and supporters) and she countered it was Clark County Citizens United and I spoke last week. or similar comments. I told her the information I was giving was different than last week, but she continued to counter. To make matters worse, Councilor Stewart sided with Ms. Cook and said it wasn't fair that I should speak again when there were others who might have wanted to speak, but didn't think they could. I then said legally she could not stop me from speaking. I proceeded with testimony, but by then some of my 3 minutes of time had been used, and I was unable to give my whole testimony verbally. This exchange from county staff and councilor was degrading and embarrassing to me. It made me look as if I was trying to be treated differently than other citizens, which certainly wasn't the case. This all happened in a public forum with an audience. I understood from the last hearing of September 3, 2015 that there were two opportunities to speak to that forum. Since I do not generally attend the Planning Commission hearings, I wanted to take advantage of having two opportunities to state different positions and comments within the combined 6 minutes of allowed testimony. I went back to listen to exactly what was said on September 3, 2015, by Councilor Madore, as I understood it differently than Ms. Cook. The following is verbatim quotations; "The purpose of this evening is to make sure that we receive testimony from you. It's our tum to hear from you. There are two opportunities for citizens to make sure you have been heard. This is one of two meetings. September 3. If you testify here, you have an opportunity to speak for three minutes." "There will be another opportunity September 10 at the same time, same location here at 6:00P.M. as well. If you testify tonight, the idea is that you have been heard..... It's not an election. What we're doing is making sure that each issue, each point, each insight that you can offer us will be heard. There are two opportunities for verbal testimony " Clearly Councilor Madore did not limit testimony to only one night. Certainly the Councilors would want to hear all of the testimony presented by the public regarding the Draft SEIS in as many forums as possible to get the whole picture. I understood the purpose for the joint meeting was so that people didn't have to repeat their testimony twice to commissioners and councilors and have to attend two meetings, as well. Regardless, it was not appropriate for Ms. Cook to attempt to censure my testimony in an open public forum. This speaks to the open public process requirements of the Growth Management Act as it regards public input and outreach. As a county attorney representing the councilors, Ms. Cook should have known better. Perhaps a public apology is in order.	Thank you for your comment. The commenting process for the DSEIS is intended to be an opportunity for the public to comment on the merits of the alternatives and the adequacy of the environmental analysis before it is released as a final document The reason the County asks that members of the public to only provide one oral testimony is so that everyone has the opportunity to speak during the hearing; there is no limit to the number of written comments a member of the public can submit so long as it is submitted with in designated comment period. The County, reading the quoted text you provided, does not interpret his intention as being for people to have two testimonies, but rather that there are two opportunities for a person to give a testimony. For instance, if a member of the public was unable to attend one meeting they could still speak at the other. We apologize for the confusion. Efforts will be made in the future to ensure that the public clearly understands the oral testimony process.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
194	Carol Levanen	9/2/15	1	<p>CCCU, Inc. is researching whether the Food Systems Council, an environmental political group, is affiliated with the Clark County Health Department. The information in these attachments would indicate that they are. CCCU was told that the FSC is a private organization that is not a part of Clark County and Clark County Health Department. But, the attached video clearly disputes that information. Federal grants, county staff and funding have been provided to this organization via the Clark County Health Department. The money that has been spent for this political organization, which includes the Friends of Clark County and Futurewise, could have been spent for legitimate health related purposes. CCCU believes the Clark County Health Department, who uses public tax dollars for their existence, must distance itself from organizations that have a political agenda, which clearly includes the Clark County Food Systems Council. The video was produced in 2014.</p> <p>http://www.clark.wa.gov/public-health/about/documents/fsc/fsc framework.pdf http://www.clark.wa.gov/public-health/food/documents/FSCApplicationform2013.pdf https://www.youtube.com/watch?v=YE_GHT4F3gcY&feature=youtu.be</p>	<p>Thank you for your comment. The Clark County Food System Council was formed in August 2007 as a citizen advisory board sponsored in part by Clark County Public Health. In September 2008, Clark County Public Health made a commitment to house the Clark County Food System Council and fund a staff person to support its efforts. Funding of this group is outside of the scope of this SEPA process. We suggest that you submit a formal comment to the County.</p>
195	Carol Levanen	9/3/15	1	<p>The Draft SEIS to the 2016 Comprehensive Land Use Plan has included a Septic System Soil Suitability map. This map is new, as previous Comprehensive Plans have not included such a map. The map indicates that almost all of Clark County is unsuitable for septic systems, even though there are thousands of such systems in place today that are functioning quite well. Many of them are standard systems. Research indicates that 80% of aquifer recharge area water is provided by return of water via septic systems. With the new technology used in the design and installations of such systems today, they should be encouraged. This map is unnecessary. Recent resource data indicates that septic systems are more environmentally friendly than sewer systems and are becoming the trend for those who want to protect the environment. In addition they are less costly to the landowner and to the municipalities. CCCU is aware of one landowner who has a septic system that processes drinking water.</p> <p>Since there is not scientific data that supports elimination of septic systems in Clark County, it appears that the map is intended to inaccurately demonstrate a reason to prevent septic systems in the rural and resource communities, where they are commonly used. his would effectively prevent the rural and resource lands from allowing any new development. This is not what the GMA has intended.</p> <p>The only requirement in the GMA is that rural development not be urban in nature and that rural character is preserved. The GMA intends that rural and resource lands would have development and the infrastructure to support it. Septic systems are part of that requirement.</p> <p>The Septic System map is unnecessary. Research and scientific data demonstrates that prime and good agriculture and forest soils are well drained and well suited to support septic systems. CCCU, Inc. recommends removal of the septic system soil maps provided in the Draft SEIS of the 2016 update of the Comprehensive Land Use Plan.</p>	<p>The intent of the DSEIS was not to suggest that all septic systems should be eliminated, nor to suggest that no new septic systems could be constructed. The soil rating comes from the USDS, NRDC and DNR with respect to the suitability for supporting septic systems. It is correct that new technologies make it possible to operate properly functioning septic systems in soils that otherwise would not support a traditional septic system (see Section 2.2.2 of the FSEIS). The intent of the Septic System Soil Suitability map in the DSEIS, and subsequently the FSEIS, was simply to report the soil constraint and make the County aware that appropriate measures would be required for development in those constrained areas. It remains true that an increased in the number of septic systems will also increase the potential for groundwater contamination from failing systems.</p>
196	Carol Levanen	9/10/15	1	<p>Alternative 4 is the best choice of the alternatives offered in the DSEIS, but more work needs to be done.</p>	<p>Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.</p>
196	Carol Levanen	9/10/15	2	<p>Authors of the Draft SEIS didn't go far enough in their analysis. Nor did they adequately portray 13 equal goals in 36.70A.020 of the GMA, particularly, protection of private property rights. Environmental impacts are biased and skewed against Alternative 4. GMA Comprehensive land Use Planning, is to plan for housing, economic vitality and infrastructure, to accommodate growth for 20 years, not plan for no growth or prevent growth. A status quo plan is not realistic and a community will quickly fall behind in meeting GMA goals. According to CTED, this county grew by 15,000 people from 2013 to 2014, but is only planning for 6,431 now. That's less than half annual growth and is not acceptable.</p>	<p>The growth targets for the Clark County 20-year planning horizon were set by the BOCC after reviewing state population forecasts from the Office of Financial Management and County GIS information, independently of the SEIS process. The BOCC-adopted Preferred Alternative accommodates all of the projected growth over the next 20 years. Please see Chapter 1 of the FSEIS for a complete description of the Preferred Alternative, and Chapter 6 Land and Shoreline Use for a description of the population distribution.</p>
196	Carol Levanen	9/10/15	3	<p>Michael Williams, Southwest Region Planning Manager, Washington State Department of Transportation, Vancouver office, states, -wsoors vision is to provide a sustainable and integrated multimodal transportation system. • One assumes the major improvements to State Highway 502 was to meet that goal, for expected growth of 20 years and beyond. Clark County will likely continue the statistical trend of 15,000 new people annually and the state needs to plan for realistic growth. Alternative 4 does not drive increased population, as growth happened between 2013 and 2014 with status quo. Transportation has also been frozen with zoning, and the state is falling behind. Alt. 4, will simply recognize existing parcels in rural and resource areas. Transportation impacts from these lots already happened and have no effect on increased future impacts. As always, new parcels will pay for new impacts via policy and taxes.</p>	<p>Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
196	Carol Levanen	9/10/15	4	Dividing potential Alt 4 lots by 20 years, equals only 620 parcels a year. With steep slopes and critical areas removed, the number would be much smaller. Alt.1 equals 354 and Alt 2 equals 411 parcels a year. Alternative 4 calls the land what it is, using predominant parcel size in an area. Alt 1 and 2 don't. Ifs good sense for the county to be realistic in evaluations. Some lots will be created, but environmental impacts are minimal as county code has protections for future environmental impacts. The Draft SEIS does not give analysis in this regard. The DSEIS simply makes statements, backed by limited scientific data. More work is needed in the draft to demonstrate true environmental impacts of all of the alternatives.	There is no way to determine how fast development will occur within the rural areas of Clark County. It would be inappropriate to allocate only a certain number of lots that could be created within one year of the planning cycle. As required by the Department of Commerce, the SEPA analysis must look at the environmental impacts of the fully built-out plan. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
196	Carol Levanen	9/10/15	5	Soil Limitations to Septic Systems map Figure 2-3, says most the county is very limited to septic sewer systems, and yet agriculture and forest maps show most the county as prime or good soils. Septic systems need well drained soils, as do agriculture and forests. If soil is not conducive to septic systems, it is not conducive to resource land. The DSEIS does not demonstrate this. The Lagler Dairy Fann is being proposed for commercial and industrial development Engineers say it is Ideal for the proposed use, because the soil is excellent for percolation of septic sewer systems and stonn water run off. Quantified prime and good soil is critical in the GMA. The1980 Comprehensive Plan recognized this, but it's missing in the 2015-16 DSEIS.	The soil rating comes from the USDS, NRDC and DNR with respect to the suitability for supporting septic systems. Qualities that make soil adequate for septic systems include rare flooding, deep bedrock, low occurrence of ponds forming, lower water table, moderate percolation of the soil, good filtration, and areas without steep lopes and that lack large stones. Conversely, characteristics that make for good agricultural soils include shallow slopes, deep soils, no rock outcrops, and good drainage. Occurrence of flooding and ponding do not hinder agricultural production but can prohibit the use of septic systems. Therefore, soil can be unsuitable for septic systems and adequate for agriculture.
196	Carol Levanen	9/10/15	6	The county would do well to review other EIS documents to understand the necessity of getting it right. There is still much work to be done. Alternative 4 is a good start.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
197	Carol Levanen	9/17/15	1	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 it 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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
198	Carol Levanen	9/12/15	1	Lewis County Supreme Court Decision - For the Public Record and the DSEIS review (25) In conclusion ... we reverse the Boards decision that Lewis County may not designate agriculture lands based on local farm industry farm needs. If the State wants to conserve all alnd that is capable of being farmed, without regard to it's commercial viability, it may buy the lands.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
199	Carol Levanen	9/12/15	1	The government cannot require 30% open space set aside for a condition of approval of land development	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
200	Carol Levanen	9/12/15	1	Preserving the prime soil most important - Clark County has not done this in previous Comprehensive Plans when allowing urban growth areas to consume Clark County prime soil. Refer to 1980 maps and lists in Appendix C of 1979 Clark County Comprehensive Plan of determined prime soil. Soil has not changed since that time. Agricultural soils are incorrectly designated in the current 2007 Clark County Comprehensive Plan .	Prime agricultural soils are discussed in Section 2.1 and shown on Figure 2-1 of the FSEIS. The soils data presented in the DSEIS and the FSEIS comes from the most recent available data: the 2009 USDA SURRGO dataset. This source has been added to the figure, and the text has been revised to increase clarity. New soil data since 2007 does not change the general understanding of the soil conditions or surface geology in the county.
201	Carol Levanen	9/12/15	1	Essential nexus - Rough proportionality For the Public Record and the DSEIS Review	Thank you for your comment.
202	Carol Levanen	9/13/15	1	<p>Hello Kaitlin,</p> <p>Thanks for the fairly accurate account of the confrontation I received from Clark County Attorney, Christine Cook. The part you were inaccurate on was the statement that Concilor Madore set "rules" that prevent the public from speaking. In open public hearings, such as these, no rules can be set that prevent the public from speaking, regardless of how many times they have spoken at other hearings. In addition, this was the only opportunity for the public to discuss the alternatives before the Planning Commission and the Councilors at the same time, before verbal testimony was closed. Although Councilor Madore didn't explain it very well, those of us at the Sept 3 hearing took it to mean that those who said something at one hearing , didn't have to come to the other to give the same information. This seems fair, especially for site specific requests, which we believe he was thinking of. But, in your desire to degrade Councilor Madore, you took it out of context. It would not have been legal for Councilor Madore to prevent public testimony at these hearing, and he did not set "rules" to do so. But, your article clearly shows the Columbian bias against Councilor Madore and the open public process, when it comes to the overall agenda of the Democrat party. Both of these hearings demonstrated support for Alternative 4, which CCCU expected to happen.</p> <p>I have attached the verbatim conversation of Councilor Madore which clearly says one has the opportunity to speak twice. I would have thought you would have reviewed that video, before writing this article or perhaps you did.</p>	<p>The commenting process for the Draft SEIS is intended to be an opportunity for the public to comment on the merits of the alternatives and the adequacy of the environmental analysis before it is released as a final EIS. It is not intended to be a means by which the lead agency counts the number of people for or against a particular alternative. Therefore, submitting a comment multiple times does not give it more weight or consideration than a comment that is submitted once. The reason the County asks that members of the public to only provide one oral testimony is so that everyone has the opportunity to speak during the hearing; there is no limit to the number of written comments a member of the public can submit, so long as it is submitted with in designated comment period.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
218	Carol Levanen	9/14/15	1	<p>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.</p> <p>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 0.03of1 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 Gamas 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 S017s 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 ruff 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 1to4.99 acres in size. "Major Agricultural areas identified are in the Brush Prairie areas, Pioneer, Vancouver Lake Lowlands, Sara and the Burnt Bridge Cf99k bottom/ands. 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: subulban 1to2.5 acres; rural Residential 2.5 to 5 acres;; rural Estate 5 to 10 acres; Farm Residential over 10 acres.</p> <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	1	<p>In the Growth Manage Act, 2016 Comprehensive Plan Draft SEIS, one is lead to believe the Framework Plan was a new concept adopted in 1993 to guide the 1994 Comprehensive Plan. An examination of the text and history of the Framework Plan shows the intent and purpose of this document. Staff is improperly applying the Framework.Plan in the 2016 update. Originally, the concept was used in 1977 to determine and segregate rural, urban and resource lands. It was simply used as an organizational tool with goals and objectives for the future. In 1993 it was presented to citizens as a public outreach mechanism, leading people to believe they had a say in the planning process. In reality, the 1979 Framework Plan was simply expanded, but very little was changed conceptually. It continued to be a document that was used to segregate rural, urban and resource lands. But, in 1994,it was touted as the reason for massive down zoning of thousands of rural and resource lands into very large lots, and reflected as the peoples choice. Hundreds came forward to protest the Plan, but their pleas were ignored. Is this Council going to ignore the public testimony of those rural landowners, and allow this to happen again in the 2016 update?</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	2	<p>The 6-24-77 2nd Draft - CRITERIA FOR CHANGING URBAN RURAL AND NATURAL RESOURCE CAEGORIES, states, Within the Framework Plan of the proposed new Clark County Comprehensive Plan, three broad land use categories have been proposed; urban, rural and natural resource.</p> <p>Page 8,9 discusses resource and rural lands The existence of prime or good agricultural soils or site Index 2 Forest Lands be noted as soon as possible.... 2. That not more than 50 percent of the and ls broken up into parcels of less than ten acres. The companion document called CLARK COUNTY COMPREHENSIVE PLAN DISCUSSION DRAFT GOALS AND GUIDELINES page 1, item 2 states, Rural Lands. Those lands not within urban service guideline areas 1 and 2 that are suitable for settlement Small farms and acreage home sites are the predominant land use.</p> <p>Page 5, RURAL LANDS - Goals; 1, it states ... rural areas for the maintenance of diverse life style opportunities for present and future generations. 2. To encourage the maintenance of small farms or acreage home sites on land suitable for sparse settlement.</p> <p>Page 7-8, CONSERVATION GOALS 1. To encourage the maintenance of agricultural land uses In those areas that are agriculturally productive. 2. To encourage the conservation of land best suited for the production of food and fiber products. Guidelines: 4. b. and c., Conserve prime timberland... defined by the United States Department of Agriculture - site Index 2 or Conserve prime agricultural land soils classified by the sol/ Survey of Clark County, USDA Conservation Service 1972 currently in production ... Item 13. states, identify commercial forest land suitability by evaluation soil productivity land ownership patterns and existing use.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	3	<p>Page 12, HOUSING GOALS AND OBJECTIVES - Statement of Intent- The production and rehabilitation of housing reflect the social and economic well-being of a community. It is the responsibility of the community to strive for the highest quality of living environments for all citizens, while enabling each citizen to choose a home among a variety of housing types and residential areas.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	4	<p>Page 21-22 GOALS AND GUIDELINES FOR ECONOMIC ELEMENT- Statement of Intent- The promotion of an area wide economic environment which is conducive to the well being of the region and based on the private ownership of property and the freedom of the Individual to engage in economic activittes of his choice for his own profit and well being. 3. An annual review and evaluation of overall economic growth would be prepared.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	5	<p>Page 26 - DEFINITIONS- PRIME AGRICULTURE LAND- Soil Conservation Service Capability Classes I and II.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
227	Carol Levanen	9/1/15	6	The 1979 CLARK COUNTY COMPREHENSIVE PLAN GOALS AND GUIDELINES- INTRODUCTIONS - states These Goals and Guidelines and attached Broad Land use Map (which together constitute the Framework Plan) are Intended to establish a benchmark along the route toward the adoption of a more detained Comprehensive Land use Plan. The Framework Plan Is not intended to constitute the Comprehensive Plan of Clark County, except for the purpose of designating the boundary lines between urban, rural and natural resource areas. This, for the purpose of establishing these boundary lines the Broad Land Use Map and the planning data upon which it is based shall take effect immediately upon the adoption of the Framework Plan. It is not intended in so adopting this Framework Plan to repeal, either expressly or impliedly, and portion of the Clark County Comprehensive Plan adopted on February 23, 1960.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	7	Page 16, ECONOMIC ELEMENT- GUIDELINES; 2. it states, Encourage a diversified economy with employment opportunities which complements the characteristics of the Clark County labor force.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	8	Page 20 DEFINITIONS • PRIME AGRICULTURAL LAND • Soil Conservation Service Capability Classes I and II.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	9	In the May 26, 1993 Community Framework Plan, Clark County, Washington, on page 8 it reads, ISSUES ADDRESSED BY THE COMMUNITY FRAMEWORK COMCEPTS - This is the beginning. The Draft Community Framework Plan does not change the existing comprehensive plan or zoning of Clark County. However, the Draft Community Framework Plan does provide the framework with which the County, cities, and towns have the flexibility to develop their own growth policies and plans for their individual 20 -year Growth Management Comprehensive Plans. It goes on to say, Outside the urban areas; the land Is predominantly rural with farms, forests open space, and large lot residences. Shopping or businesses would be In rural centers. Urban level of public services would generally not be provided In rural areas. Rural residents are provided levels of service appropriate to their areas. These area are by definition more rural in nature and residents are more self-sufficient often relying on private wells and septic systems. Most of northern Clark County would remain as it is today, in resource industries or rural use. One might understand this sentence to mean that no change would occur with rural and resource land. But little did folks know that only the names stayed the same, and the legal lots and conforming lots changed dramatically.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	10	On Page 19, 20 - 2.0, and 2.2.0 the Housing section in the 1993 Framework Plan states, The Housing Element is to recognize the vitality and character of established residential neighborhoods and identify sufficient land for housing to accommodate a range of housing types ... In 2.2.0 - Framework Plan Policies - it states, Communities, urban and rural, should contain a diversity of housing types to enable citizens from a wide range of economic levels and age groups to live within its boundaries and to ensure an adequate supply of affordable and attainable housing. Little did the people know that only the urban area was to be included and high density was the goal.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	11	On page 24 of the Framework Plan it states in 4.1 County-wide Planning Policies a. it states, The County shall recognize existing development and provide lands which allow rural development in areas which are developed or committed to development of a rural character. On page 25, 4.2.6 it states, All new development should be of a scale consistent with the existing rural character.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
227	Carol Levanen	9/1/15	12	So one can see that the Framework Plan intended to be fair and equitable as Clark County planned for the future. It included something beneficial for all of the citizens of the county. The 2016 Plan is claimed to reflect the Community Framework Plan, but that simply is not the truth. Corrections to the Comprehensive Plan are needed to accurately reflect what was intended to happen in the lives of those who live in Clark County and in the real Clark County Community Framework Plan.	As stated in Chapter 1 of the Draft SEIS, "Clark County's Comprehensive Growth Management Plan must address state growth management goals and be consistent with the Community Framework Plan (countywide planning policies), as well as meet the requirements of the Growth Management Act (GMA)." Section 6.1.2 of the Draft SEIS provides an overview of the primary goal of the Framework Plan, and Section 6.1.3 (Housing) and Chapter 7 (Transportation) provide discussion regarding how the Comprehensive Plan Update would be consistent with the Framework Plan.
187	Carol Levanen	8/22/15	1	The East wind is blowing here and the scene is heavy with smoke from the fires East of us. The Lewis River here is like a mini gorge and we get the same winds as the Gorge does. Are we all ready for another Yacolt Burn. The conditions are identical and the Washougal fire is burning. The problem is, because of so much regulation, there are many more times the vegetation on the lands, compared to 1902. Landowners are not allowed to clear, cut trees, infringe on areas, or otherwise manage their land, to assure safety, because of regulations. As I look from our windows, I see a huge rural and urban forest stretching out to the Columbia River, which was not there when we built the house. I would hate to see all of that go up in smoke. Some of us built ponds for stormwater and fire protection, but even they are now heavily regulated in this county. The tree farmers are not allowed to access their land in such a way that it will discourage a fire, because of county environmental regulations. Landowners with large parcels can't manage their land in a way that protects them from fire because of regulation and the parcels are too large for them to manage. Large lot zoning has forced these people to forget about the future of their land, and without their children, they have no one to help take care of it. Even blackberry vines cannot be removed unless done by hand. Therefore, huge stands of the dry brittle bushes are everywhere in the county because hand cutting is too much to ask from anyone. It would seem that safety to the public would be far more important to the councilors than environmental considerations, yet all of the county environmental, and other, ordinances have left that equation out. We hope we are ready, when the fire comes. We have followed the recommendations from Fire District 3 volunteers for a safety zone around our home. We hope we never have to see if it works. But, these fires are a strong reminder to councilors that environmentalism is not the most important role the councilors must play. Protecting the citizens of the county from harm, is. All of the county ordinances need to be reviewed to assure there will be no roadblocks to the safety of the people.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
189	Carol Levanen	8/30/15	1	CCCU, Inc. is aware of a Clark County Health Department Open House for the Public on Monday, August 31, at 6:00 PM at the Vancouver Library, to push a staff agenda about "safe food". CCCU, Inc. has read the 64 page document intended for the Comprehensive Plan, authored in part by planner, Oliver Orjiako. Hidden in it's text, are proposals to create ordinances and public policy to lock up all rural and resource lands as they are today, and force people to re-combine their lands. In addition, there's a proposal to make even higher density housing and force people out of their cars. There is then a proposal to make people pay money, if they dare to drive a car and try to park it somewhere. The only mode of acceptable transportation will be transit, walking or riding a bike. This is the most creative deceit CCCU has seen thus far, in any document designed to force a high density, no growth agenda on the people of Clark County. It would seem that the Councilors should be well aware of what the Health Department Food Council is doing. First, an outrageous web page with shocking videos meant to frighten the public, now the meeting that will attempt to quantify those videos. Whoever authorized such staff activity should step down from whatever position they hold. The people of Clark County have had enough of the no growth and high density agenda. It doesn't work in this county and it will not be tolerated .. The attached formation is only one of the confirmed studies indicating that high density is the reason for poor health, and not the solution.	The senate passed a bill in 2005 (ESSB 5186 and related bill SB 1565) that amended the GMA to require that communities create plans that promote healthy lifestyles. That is reason behind the inclusion of healthy living policies in the 2016 Comprehensive Plan Update. Analysis of health living policies and their impacts on the environment is not required under SEPA, and therefore it is not considered a component of this Draft SEIS process.
140	Carol Levanen and Susan Rasmussen	9/11/15	1	Rural lands - resource lands - see pages 11, 12, 13, 14 ,22, 26 Critical lands - see pages 17, 18, 20, 21, "Protection of critical areas does not require enhancement or improvement Critical area buffers, Sandy Mackie http://www.lawseminars.com/materials/07GMAWA/gmawa%20m%2012%20Mackie%2011-12.ppt.pdf	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
056	Carol Taylor	9/15/15	1	I support Alternative 1 - as nothing is perfect, but it still protects the family farms and Clark County's viable ability to grow our own food.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
056	Carol Taylor	9/15/15	2	As we've discovered, we were healthier when we ate food that we grew ourselves - and by changing the Comp Growth Plan, we will squeeze out the ability for our residents to grow crops, etc. As a life-long Clark County resident (and third generation Clark County resident), I used to live in the "boonies" also known as Hockinson raising horses & cattle, while growing our own food in an acre sized garden. I have watched as the horse farm nearby became a housing development in recent years and worry that we will be losing our county integrity by raising "urban sprawl" instead of livability. Please do not reduce the parcel sizes! I hope that my adult children and their children will be able to continue living in Clark County. Thank you for allowing me to voice my opinion.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
065	Carrie Parks	9/17/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
050	Chad Eiken	9/16/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
050	Chad Eiken	9/16/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
050	Chad Eiken	9/16/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
050	Chad Eiken	9/16/15	4	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. (pl- 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.	The full 2016 Comprehensive Plan update is required to be completed by the June 2016 deadline, including plans and policies governing the rural areas of Clark County. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
050	Chad Eiken	9/16/15	5	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.	Thank you for your comment. Under SEPA, a range of reasonable alternatives must be assessed that meet the project objective. The County recognizes that infrastructure costs should be considered during the selection of a preferred alternative and will not select an alternative that cannot realistically be implemented over the 20-year planning period.
050	Chad Eiken	9/16/15	6	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)	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
050	Chad Eiken	9/16/15	7	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.	As described in Chapter 1 of the DSEIS and the FSEIS, this document is supplemental to the 2007 Comprehensive Plan update. It was intended to build upon that analysis. Where information in the 2007 document was still relevant, the 2016 incorporated it by reference. In addition, work completed by Clark County on the traffic network are included in Chapter 7 and Appendix E of the FSEIS.
050	Chad Eiken	9/16/15	8	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.	Alternative 4 is no longer being considered. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative. While it is true that the SEIS does not include a cost analysis for any of the alternatives considered to date, the County is completing an analysis of potential costs as part of the Capital Facilities Plan.
050	Chad Eiken	9/16/15	9	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
079	CharLynn Tapani	9/10/15	1	I support Alternative 4! Please give back our property rights!	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
074	Cheryl Georgioff	9/11/15	1	Add my name to the many that want Clark County to be farmer friendly and have policies that help increase the amount of Clark County grown food.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
074	Cheryl Georgioff	9/11/15	2	I DO NOT support Alt 2 or Alt 4's removing AG-20 nor the creation of R-1 and R2.5 outside of the Rural Centers.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
074	Cheryl Georgioff	9/11/15	3	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. Thank you for giving full consideration and support to Slow Food Southwest Washington's position statement on the Comprehensive Plan and conserve farm land and strengthen the farm economy.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
178	Chuck Green	9/3/15	1	I am submitting these comments for the record as part of the September 3, 2015 hearing on the Draft Supplemental Environmental Impact Statement (DSEIS) for the Comprehensive Plan update. I am submitting these as a candidate for Clark County Council District 2, and as a resident of Clark County. Request that All Five Councilors Act on Preferred Alternative I will repeat my request made at the April 14, 2015 hearing on Alternative 4. The current Comprehensive Plan process, including SEPA Supplemental Environmental Impact Statement development, would have the current three-person Council making a preferred alternative decision before November 2015. That would prevent the two new Council positions, under the adopted Home Rule Charter, from having a part in such an important policy decision. As such, I am requesting that the Council postpone any decision on the Preferred land Use Alternative until all five County Councilors are seated in office. To implement this request and address State mandated deadlines, I recommend that the County Council adopt Alternative 1, the current Comprehensive Plan, as the "Interim Comprehensive Plan", for a period of two years.	Thank you for your comment. The County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension. Once the plan is updated, it is unlikely that the County would choose to reinstate the process until required to do so in eight years.
178	Chuck Green	9/3/15	2	I am recommending the county undertake a value-based Comprehensive Planning process, which I outline later in this letter.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
178	Chuck Green	9/3/15	3	As the county's former Transportation Manager and as a professional with over 23 years of transportation experience in Clark County, I am focusing my comments on Transportation for the DSEIS. The DSEIS provides a good, qualitative assessment of the four land use alternatives. I am providing a quantitative assessment of each alternative. A matrix containing my more detailed analysis is included as an attachment to this letter. Alternatives 1 and 3 Alternatives 1 and 3 have the least detrimental impacts on the county's transportation system. Additionally, they have the least impact on the affordability of the transportation capital facilities plans for each alternative, including roads/freight, C-TRAN, and bicycle/pedestrian facilities. Both Alternatives 1 and 3 contain a balance of urban and rural residential development and jobs. There will be measurable increases in traffic congestion along major corridors as road and public transportation improvements will not keep up with increases in trips and traffic congestion. There will be some increase in traffic congestion along major rural arterials such as NW 31' 1 Avenue, NE 72"d Avenue, and NE 182"d Avenue. With continued non-residential fee waivers, the county will struggle to implement much-needed transportation improvements to NE 10th Avenue, NE 179th Street, NE 72"d Avenue, and other arterials. Alternatives 2 and 4 Alternatives 2 and 4 will both result in increased rural trip making and increased traffic on rural arterials. With a larger number of rural lots possible compared to Alternatives 1 and 3, without corresponding job creation, residents of the rural area will travel long distances to job markets in Ridgefield, Vancouver, Camas and Oregon. Several rural corridors will experience over-capacity conditions during peak periods. These alternatives will have the highest negative impacts on public transportation (C-TRAN), pedestrian and bicycle travel and facilities, and safety. These alternatives will increase traffic levels, and therefore expand the hours of over-capacity demand, on both 1-5 and 1-205 across the Columbia River compared to Alternatives 1 and 3. It is likely that with the amount of congestion and idling delays of vehicles on the 1-5 and 1-205 corridors, and the expanded hours of over-capacity congestion, the region's air quality could suffer to the point nearing being in non-attainment.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
178	Chuck Green	9/3/15	4	<p>My Value-Based Planning Proposal</p> <p>After talking with a number of people across the political spectrum at and subsequent to the Hockinson open house as well as hundreds of people during my campaign, I recommend that the county hold off on further developing and assessing alternatives and instead, undertake a broad, value-based community discussion on what should go into the Comprehensive Plan. I believe there are components of Alternative 4 that could be incorporated to protect property rights and family investments while also being compliant with the Growth Management Act.</p> <p>As a candidate for County Council, if elected, I would be happy to champion such an effort. I do not have any financial gain realized in any of this effort nor am I associated with anyone who does stand to gain financially.</p> <p>My Value-Based Plan process includes:</p> <ul style="list-style-type: none"> • Reaching community agreement or informed consent on values and performance measures with which to develop and evaluate the Plan. • Inclusion, rather than exclusion, by involving a comprehensive variety of community groups, such as Clark County Citizens United, Friends of Clark County, land conservation as well as the building and development community, and others, to provide input and discuss trade-offs of various options. • Bringing in a group such as WSU-Vancouver's Initiative for Public Deliberation to facilitate a series of forums to capture community input. • Allowing County Planning staff to fairly and equitably develop and evaluate a plan for community review, before acted on by the FIVE County Councilors. 	<p>Thank you for your comment. The County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension. Clark County has actively sought to include the public in every step of this project, during which time the planning staff has worked to ascertain community values as it has developed its four alternatives. The County will consider your proposal of an additional alternative, but it is disinclined to further delay the process and be noncompliant with state law.</p>
070	Cynthia Thorton-Tang	9/17/15	1	I support Alternative 1 as it does more to protect natural resources and discourage urban sprawl.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
019	D. Olson	9/17/15	1	I prefer Alt One or Three	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
019	D. Olson	9/17/15	2	Alt Four is a last minute alternative which has not been scrutinized by professional planners or public participation with the same degree of intensity as the other options.	Thank you for your comment. The County believes that it has done a thorough evaluation of all of the Alternatives for all of the elements of the environment discussed in the Draft SEIS. Through this analysis, and the consideration of public comments, the BOCC has adopted a Preferred Alternative, which is fully described in Chapter 1 of the FSEIS.
019	D. Olson	9/17/15	3	The adoption of Alt Four and its emphasis on small lot developments will, within a few years, require the County to extend, and pay for, a much higher level of urban services and major capitol expenditures at a much higher cost than any of the other options.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
043	Dave Campbell	9/4/15	1	<p>Having lived and worked in Clark county since 1962, I have seen many changes to the entire area over the years. As a fire commissioner for nearly 32 years I saw increasing population and pressures for more places to build homes, mainly in the "forest interface". Dangerous as these areas are to wildland fires, with proper remediation they can be made much safer. These homes, while many are needed for the increasing population from the influx of people migrating to our area, they are in a larger part needed for the families of our resident population as they married and started raising their own families. The question thus arises as to how can we leave land to our children so that they can continue to live here?</p> <p>Large lots of 10, 20 to 40 acres or more prohibit many of our older residents from partitioning a few acres for our children or to utilize that long term investment in land to support us in our waning years. Those large lots are, in many cases taxed under one of the land use categories which would then under any subdividing would be withdrawn from the land use category. Recognizing that a strain on our infrastructure could occur, however, a great deal of the additional cost of improvement would be covered in the increased taxes under the new classification of the properties.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
043	Dave Campbell	9/4/15	2	I do support Alternative 4 as proposed or Alternative 2 as a compromise.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
043	Dave Campbell	9/4/15	3	I do not support Alternate 1.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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003	David McDonald	9/3/15	1	FOCC asserts that Alternative #4 violates WAC 395-190-060(2) by allowing for a large scale reduction in large lot zoning with minimum lot sizes that would be large enough to achieve successful farming practices. Also, the more one allows the smaller developable lots in the rural area, the more pressure there is on other landowners with large lots to parcel them out. For example, under Alternative #4 as proposed, the county could have two AG 20 lots sitting side by side. If one of those AG-20 lots is currently divided into 20 non-legally developable one acre parcels, Alternative #4 would recognize those lots and allow 20 homesites. Once that occurs, by law the County would have to allow the adjoining AG 20 parcel to develop 20-one acre lots either under a Comprehensive plan amendment or an assertion of a change in circumstances. The "domino" effect would be real and sustained. Washington State Supreme Court has held in the Soccer Fields decision that [t]he County was 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.1 A ten acre minimum lot size and density will not meet this standard. Professor Arthur C. Nelson analyzed agricultural land preservation techniques and concluded that "[m]inimum lot sizing at up to forty-acre densities merely causes rural sprawl-a more insidious form of urban sprawl."8 Further, Clark County's average farm size has increased from 37 acres in 2007 to 39 acres in 2012, an increase of 5.4 percent.9 During the same time period, Washington's average farm size increase by 4 percent.10 The increase in average farm size does not support a reduction in the minimum lot size and density.	As analyzed in the DSEIS, no alternative would allow for the division of AG-20 lots into one-acre parcels; regardless Alternative 4 is no longer being considered in the Comprehensive Plan analysis. Under the Preferred Alternative and as shown in the FSEIS, the AG-20 zone would be changed to AG-10 (minimum parcel size of 10 acres).
003	David McDonald	9/3/15	2	In conclusion, the comments that have been provided by proponents of Alternative #4 regarding agricultural lands seem to be a misplaced attempt at de-designation. These lands are designated and presumed valid. There is a specific process for de-designation that is not being undertaken. Therefore, the comments regarding soils and resource lands that appear to undermine the designations should not, and cannot be used as grounds for justifying reductions in the minimum lot sizes and, given that Clark County used the minimum lots sizes as one of the regulatory tools under WAC 365-196- 815(3) to protect those resource lands, by embracing Alternative #4, the County is acting in contravention of the mandate to protect these previously designated, GMA compliant and presumptively valid agricultural lands.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
128	David McDonald	9/17/15	1	After I filed the comments this morning with questions regarding the CFP, it was pointed out to me that I did not make a distinction between residential and non-residential TIF. The County is still collecting residential TIF funds (although the Councilors have discussed eliminating residential TIF as well). To the degree my comments were incorrect in saying that the County was collecting "no" TIF, that is incorrect so this note is to amend my comments to be "no TIF" to "no non-residential TIF. However, I do not think that changes the fact that the County's failure to collect non-residential TIF appears to be creating financial deficiencies in the County's ability to adequately fund and carry out the CFP especially if the non-residential TIF collection is traditionally much greater than residential TIF collections. Although I have not "drilled down" into the all the projects, I think it is important to note that so far current funding levels do not appear sufficient to carry out the current CFPs.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
159	David McDonald	9/15/15	1	Please accept these additional comments from and documents from FOCC for the DSEIS process and the Comprehensive Plan update. The documents come in the form of several maps created by Clark County GIS. Specifically, the maps are as follows: 1. Woodland Suitability Group Productivity Class for Clark County Washington; 2. Land Capability Classes for Clark County, Washington; and 3. Soil Types for Clark County, Washington. FOCC suggests that these County maps show that the County has zoned for larger lot resource land parcels in accordance with the appropriate soil types and land capabilities. We hope that the decision makers find this maps of assistance in their deliberations.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
203	David McDonald	9/17/15	1	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.	Thank you for your comment. Impacts assessed at the programmatic level tend to be more general due to lack of knowledge about specifics regarding how the development would actually occur. Once a preferred alternative is selected, and subsequent projects are conducted, additional SEPA review in the form of a SEPA Checklist, SEPA EIS, or addendum to this Non-project EIS, may occur as appropriate to better identify specific environmental consequences and their magnitude.
203	David McDonald	9/17/15	2	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."	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
203	David McDonald	9/17/15	3	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."	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
203	David McDonald	9/17/15	4	<p>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 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 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.</p> <p>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 SEP A 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 programming. She discussed lost 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 TIPFFIF funds. The result may be that has delayed projects beyond the 20 year plan such as the Barberton project, reduce design budgets etc.</p> <p>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 CFP when they cannot meet what is in the current plan?</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
203	David McDonald	9/17/15	5	<p>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. .</p> <p>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.</p>	Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative, including proposed changes to the UH designation.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
203	David McDonald	9/17/15	6	<p>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.</p> <p>Certainly, it is possible that all of these funds are available but, at this juncture, they are not part of the record.</p>	Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative, including proposed changes to the UH designation.
203	David McDonald	9/17/15	7	<p>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 SPEIS) 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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
203	David McDonald	9/17/15	8	<p>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.</p>	Thank you for your comment. Per Washington Administrative Code 197-11-444, public health is not considered to be an element of the environment under SEPA; therefore, it is not evaluated in this SEIS. However, it will be part of the final 2016 Comprehensive Plan Update.
				<p>This letter is to respond to the letter in the record from Carol Levanen dated August 4, 2015 and the e-mail from Carol Levanen dated August 31, 2015 and correct the inaccuracies in her two submissions. I am submitting these comments on behalf of Friends of Clark County. Both of Ms. Levanen's submissions wrongfully suggest that the County failed to comply with the rulings in Case 96-2-00080-2.</p> <p><i>In her August 31, 2015 e-mail she states the following:</i></p> <p><i>"This WWGM Hearings Board Remand demonstrates that all of Judge Poyfair's orders were not followed. Instead, the Board isolated the remand to just Agri-Forest and Rural Centers and ignored action on the other orders handed down by the Superior Court. 'They' timed this remand decision to happen just after the Court of Appeals decision of 1999, counting on CCCU's attorney not being available to protest the remand action. CCCU believes that the Clark County 1994 Comprehensive Land use Plan was the most corrupt process of any in the state except perhaps Seattle. The Plan in place today, is the same plan that was adopted in the rural and resource land in 1994. It has never been changed and after over twenty years, legitimate changes must be made."</i></p> <p><i>In her letter dated August 4, 2015 she makes three assertions: 1) Clark County is not in compliance with Judge Poyfair's ruling because it never did a SEPA analysis of the Agri-Forest Lands, 2) The County never complied with "the Court orders or the Order of Remand" .. "No progress reports can be found and the Hearing Board only conducted a few compliance hearings for agri-forest and rural centers. 'They' failed to assure the County complied with all of the court orders which also included items 3) Statutory Mandate, (4) Agri-Forest Lands (6) Comprehensive Plan EIS, and (7) Rural Land Densities. This resulted in the 36,000 acres of Agri-Forest Land and the rural centers never having an EIS to support changes that did occur later"; and 3) Some claim that some writings (no citations to the articles are provided so it is impossible to know which articles to which she refers) misconstrue the 1999 Court of Appeals opinion regarding the use of OFM numbers. (One appeal was take from Judge Poyfair's rulings and that was an appeal by CCNRC challenging the portion of Judge Poyfair's ruling regarding the county's assertion that they were mandated to use the OFM number in determining rural population allocation).</i></p> <p>The majority of the contents of these two documents is simply not supported by the record and/or totally misrepresents or obfuscates the reality of Judge Poyfair's decision and the other related legal actions. The simple truth is that Ms. Levanen and Ms. Rasmussen, who herald themselves as the preservers of rural life despite many farmers and foresters who object to their positions, more than achieved their goals in 1990s to reduce lot sizes in the rural zone, eliminate the Agri-Forest zone, implement Rural Centers and reduce development regulations that would have provided more protective regulations of the environment.</p> <p>In order to understand the claims that Ms. Levanen is wrongfully asserting, one must go back and follow the record from the filing of the first appeals that challenged the County's 1994 Comprehensive Plan to the last Compliance Order issued by the WWGMHB in 2006.</p> <p>History of the Achen Appeal and Poyfair Remand</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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				<p>In 1994, after work by multiple task forces, input from thousands of citizens, scores of public hearings and intermediary and interlocutory legal actions, our County adopted our first Comprehensive Plan. A myriad of parties appealed the Comprehensive Plan to the WWGMHB. While the appeals were being litigated, Clark County executed a stipulation in WWGMHB Case No. 94-2-0014 stating that the County failed to enact interim development regulations designed to designate and protect critical areas and natural resource lands. Instead, the County relied on various combinations of existing non-GMA ordinances and zoning, which it admitted failed to meet the identification, designation or protection requirements of state law. Therefore, the County agreed to go back to the public process on their development regulations. In September 1995, The WWGMHB issued a Final Decision and Order (FDO) in the case commonly known as Achen et al case of which CCCU was -a Petitioner. There were 16 separate motions filed on reconsideration and the WWGMHB subsequently ruled on each of those and issued an Order on Reconsideration on December 6, 1999. Several appeals were taken from the WWGMHB FDO. However many issues of noncompliance found by the WWGMHB were not appealed and those issues were remanded to the County for compliance.</p> <p>The appeals from the WWGMHB FDO and Order on Reconsideration were assigned to Clark County Superior Court Judge Poyfair. Judge Poyfair subsequently issued an opinion that reversed the WWGMHB Final Decision and Order (FDO) on several grounds and held the following: 1) The Agri-Forest designation violated GMA; 2) the County's failure to solicit meaningful public input for the Agri-Forest designation violated the public participation provisions of the GMA requiring early and continuous public participation in the development and adoption of the comprehensive plans; 3) The county failed to ensure a variety of densities in the rural area because it removed the designation of rural centers from its Community Framework Plan; 4) determined the rural population allocation based upon the use of the selected OFM number and 5) the EIS was inadequate because it failed to include the Agri-Forest designation in its analysis.</p> <p>Judge Poyfair also issued an Order on Reconsideration denying various motions for reconsideration and clarification and affirming the Findings of Fact, Conclusions of Law and Order issued on April 4, 1997 with one exception, which dealt with the issue of variety of rural densities. He found that the eradication of the centers violated the planning goal of requiring a variety of rural densities and reaffirmed that the WWGMHB erred by mandating that the County use OFM projections for allocation of rural population. See Order on Reconsideration (June 5, 1997).</p> <p>Both the April 4, 1997 Findings of Fact, Conclusions of Law and Order and the June 5, 1997 Order on Reconsideration were drafted and submitted by CCCU's attorney.</p> <p>One piece of Judge Poyfair's ruling that CCCU continues to ignore, and most important to the current process, is that Judge Poyfair found there was substantial evidence in the record to support the County's designation of agricultural resource lands. CCCU did not appeal that portion of the Poyfair decision and it remains valid to this day.</p> <p>Procedurally, Judge Poyfair remanded the case to the WWGMHB who, in turn, issued a Remand Order in August 1997 that remanded all the issues from the Poyfair decision to the ColUty. The Remand Order stated:</p> <p>Therefore, it is ordered that Clark County is not in compliance with the Growth Management Act as to those matters set forth in the separate appeals and the matter is remanded to Clark County to achieve compliance consistent with earlier orders of the Board as modified by the Superior Court orders referenced above which are incorporated herein. Because of the unusual scope and complexity of the issues, under the provisions of Chapter 429, Laws of 1997, Section 14(3)(b), compliance shall be achieved by March 2, 1998. The County shall submit a report on the progress it is making toward compliance by December 15, 1997.</p> <p>See WWGMHB #95-2-0067 dated August 11, 1997 (emphasis supplied).</p> <p>Also, and despite Ms. Levanen's protestations to the contrary, CCCU was not hamstrung at all in litigating any matter and had plenty of opportunity to pursue the matter as evidenced by the fact that CCCU appealed a portion of this Compliance Order to Clark County Superior Court. See CCCUv. WWGMHB, Clark County Superior Court Case No. (99-2-02394-7)(Bennett Appeal). During this appeal, CCCU asked Judge Bennett for an Order requiring that the County to comply with the City of Redmond's decision. See Clark County Superior Court Case# 99-2-02394-7 dated August 9, 1999 (filed August 27,1999). Again, during this appeal, CCCU never claimed that the County failed to comply with Poyfair's Order in any respect. To be clear, CCCU was present with legal counsel in all four Clark County Superior Court Appeals, as well as the Poyfair</p> <p>Remand Compliance hearing, but never did CCCU ever request the WWGMHB to find that the County was not in compliance with the Poyfair Remand. They cannot now credibly claim the contrary.</p> <p>The May 11, 1999 Order was the second to last Order on any request, by any party, to find that the County had, or had not, complied with any WWGMHB Order on the original Achen et al appeals. The last Compliance hearing that the parties had a right to participate in was in 2000 regarding the transportation component. Only CCNRC and the County participated in that hearing.</p> <p>On May 8, 2006, 2 years after the County issued its new 2004 Comprehensive Plan, the WWGMHB issued an Order to Show Cause Re: Compliance in Achen. Specifically, the OSC had a provision that the parties must respond no later than May 22, 2006 or the case would be dismissed. No response was received from any party including CCCU. The WWGMHB issued an Order Finding Compliance and Closing Case.</p>	

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
223	David McDonald	9/14/15	1	<p>The Order stated: Although compliance was shown on some issues, compliance for several remaining issues in this case has never been found in a Board order. This case has been open for a number of years without action by any party. However, on September 7, 2004, Clark County adopted a revised comprehensive plan. Several aspects of this revised comprehensive plan were challenged in a Petition for Review and eventually found compliant. See Building Association of Clark County, et al., v. Clark County, WWGMHB Case No. 04-2-0038c (Amended Final Decision and Order, November 23, 2005). The unchallenged portions of the revised comprehensive plan are presumed valid and deemed compliant. RCW 36.70A.320(1). Therefore, with the adoption of a revised comprehensive plan and the issuance of the November 23, 2005, Amended Decision and Order in Building Association of Clark County, et al., v. Clark County, WWGMHB Case No. 04-2-003 Sc, the Board determines that any compliance issues remaining in this case have most likely been resolved.</p> <p>For that reason, the Board issued its show cause order of May 8, 2006. With the absence of any response by any party, the Board concludes that compliance should be found and this case closed.</p> <p>ORDER Based on the foregoing, COMPLIANCE on the remaining issues in this case is found and the case is CLOSED (emphasis supplied). This remand is known as the "Poyfair Remand". As can be seen by the language of the Order, the WWGMHB remanded all issues in Judge Poyfair's ruling to the County, including the issue subsequently appealed by CCNRC. After the remand, Clark County went back to work on all of the issues ordered to be remanded to the County.</p> <p>While the Poyfair Remand was being dealt with at the County level, CCNRC appealed one issue--whether or not the County was required to use the OFM number in determining a cap on rural population allocations. The appellate court ruled that, although GMA did not require the county to use OFM's projections as a cap on non-urban growth, it could use the OFM projection number if doing so would otherwise meet the goals of the Act. Specifically, the court stated:</p> <p>Without so holding, we assume that the GMA permits a county to use OFM's population projections when planning for lands outside its urban growth areas.</p> <p>Clark Cnty. Natural Res. Council v. Clark Cnty. Citizens United, Inc., 94 Wash. App. 670, 676, 972 P.2d 941, 944 (1999)(emphasis in the original)</p> <p>Thus, as set forth by Judge Poyfair, GMA allows for the County to use a variety of tools for population allocation, including the OFM numbers. but does not mandate that those tools be utilized. The Court of Appeals issued its opinion on March 12, 1999. CCNRC filed a petition for review with the Washington Supreme Court but that Petition for Review was denied in November 1999.</p> <p>The correct legal citation for the Court of Appeals' decision in Clark County Natural Resources Council v. Clark County Citizens United, Inc., 94 Wash.App. 670, 677, 972 P.2d 941, review denied, 139 Wash.2d 1002, 989 P.2d 1136 (1999)</p> <p>In addition, while the matter was pending in front of Judge Poyfair (his hearing was held on October 16, 1996), other actions were being taken on the Achen case. The County was attempting to comply with the portions of the WWGMHB's original FDO and Order on Reconsideration where the County was found to be non-compliant with the GMA but those findings of noncompliance were not appealed and were not in front of Judge Poyfair. Thus the process had now become bifurcated with some of the noncompliance issues being appealed to the Superior Court (Poyfair) and some of the issues being remanded to the County.</p> <p>On October 1, 1996, the WWGMHB issued a Compliance Order and Order of Invalidation regarding multiple issues that had been remanded to the County pursuant to the original FDO and Order on Reconsideration that were not a part of the appeal in front of Judge Povfair. In that October 1, 1996 Compliance Order and Order of Invalidation, the WWGMHB found the County non-compliant on a number of issues that had been remanded. One such issue involved growth in the rural area. The WWGMHB found that the work on the population allocation, and zoning and designations, in the rural areas regarding rural, resource lands and urban reserve areas to be invalid. See http://www.gmhb.wa.gov/LoadDocument.aspx?did=866 (Compliance Order and Order of Invalidation dated October 1, 1996). This Order covered multiple areas of the County's Comprehensive Plan.</p> <ol style="list-style-type: none"> 1. Include all property of the Ridgefield municipal boundaries within the UGA; 2. Eliminate the new "redesignated" UGA of the City of Camas and redesignate the area between Camas and Vancouver; 3. Adopt appropriate criteria to determine if and/or when UGA boundaries need to be moved; 4. Determine the proper designation of "non-prime" industrial lands outside the Vancouver UGA; 5. Eliminate all non-prime industrial designations within the urban reserve area; 6. Adopt development regulations to prohibit the conversion of prime industrial land to other uses; 7. Clarify or eliminate the "no net loss" industrial policy concerning both "prime" and "non-prime" industrial lands; 8. Eliminate any and all resource lands from the urban reserve area and place appropriate resource designations on the properties; 9. Adopt and implement a public participation process that complies with the Act for the commercial code; 10. Adopt techniques to buffer resource lands in accordance with the CFP and GMA. Strong consideration must be given to aggregation of non-conforming lot sizes, as well as other techniques to reduce the impact of parcelizations that occurred between 1991 and 1994. Adopt development regulations that prevent incompatible uses from encroaching on resource land areas; 11. Increase the minimum lot sizes of rural areas located north of the "rural resource line"; 12. Adopt effective implementing DRs for existing stormwater pollution. 13. Analyze and make appropriate changes to the capital facilities element taking into consideration the incorporated plans, the completed Vancouver capital facilities element and the increase population projection. In order to comply with the Act, Ridgefield must take appropriate action to correctly designate and analyze all property within its boundaries. 	

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
				<p>Some of those Findings and Conclusions of this new October 1, 1996 Compliance Order and Order of Invalidity were appealed to the Clark County Superior Court and the appeals were assigned to Judge Nichols (Nichols I). CCCV participated in these appeals. While the appeals were pending before Judge Nichols, the WWGMHB held another compliance hearing in October 1997 on issues where the county had been found to have been non-compliant with the OMA but which had not been appealed from the WWGHB and assigned to Judge Nichols.</p> <p>So, as a result of the Achen et al appeal to the WWGMHB, some issues were appealed (Poyfair) and some were remanded for the County to come into compliance. At a subsequent Compliance hearing on the issues that had not been appealed (Poyfair) but had been remanded to the County, there was another split and some of those findings by the WWGMHB were appealed (Nichols) while others were found to be compliant and others were remanded to the County for further work to come into compliance. Once Poyfair ruled, CCNRC appealed one aspect of his ruling (OFM numbers) but the entire decision was remanded to the WWGMHB and, in turn, to the County to obtain compliance. Once Nichols ruled, the Board held a hearing and re-issued a new Compliance Order and Order of Invalidity but there does not appear to be any further compliance orders or hearings on the Nichols appeal. In March of 2009, the Board held a compliance hearing on the Poyfair remand that CCCU filed a motion to dismiss that claiming that CCNRC should have filed a new petition rather than have a compliance hearing on whether the County had complied with the Poyfair remand. Finally, in 2006, the WWGMHB issued a final Order in the Achen et al case that stated the following:</p> <p>THIS Matter comes before the Board upon its order to show cause why compliance should not be found on the remaining issues in this case. The Board issued an Order to Show Cause Re: Compliance, on May 8, 2006, providing that the parties must respond no later than May 22, 2006 or the case would be dismissed. No response was received from any party.</p> <p>Although compliance was shown on some issues, compliance for several remaining issues in this case has never been found in a Board order. This case has been open for a number of years without action by any party. However, on September 7, 2004, Clark County adopted a revised comprehensive plan. Several aspects of this revised comprehensive plan were challenged in a Petition for Review and eventually found compliant. See Building Association of Clark County, et al., v. Clark County, WWGMHB Case No. 04-2-0038c (Amended Final Decision and Order, November 23, 2005). The unchallenged portions of the revised comprehensive plan are presumed valid and deemed compliant. RCW 36.70A.320(1). Therefore, with the adoption of a revised comprehensive plan and the issuance of the November 23, 2005, Amended Decision and Order in Building Association of Clark County, et al., v. Clark County, WWGMHB Case No. 04-2-0038c, the Board determines that any compliance issues remaining in this case have most likely been resolved.</p> <p>For that reason, the Board issued its show cause order of May 8, 2006. With the absence of any response by any party, the Board concludes that compliance should be found and this case closed.</p> <p>ORDER Based on the foregoing, COMPLIANCE on the remaining issues in this case is found and the case is CLOSED.</p> <p>So, now the original FDO and Order on Reconsideration were now trifurcated: 1) Some issues were in front of Judge Poyfair; 2) Some issues were in front of Judge Nichols and 3) Some of the original issues that had been remanded to the County, but not appealed, were still being handled by Compliance hearings in front of the WWGMHB.</p> <p>After the October 1997 Compliance hearing, the WWGMHB issued a Compliance Order on December 17, 1997. The various parties stipulated to the following issues to be a part of the October 1997 hearing: As some of the remand issues from our original compliance order of October 1, 1996, as modified by an order on reconsideration dated November 20, 1996, are presently on appeal to Superior Court,</p> <p>The Nichols' appeal.</p> <p>a stipulated order was entered limiting the issues for this hearing. Various petitioners sent letters, dated July 29, 1997, and August 26, 1997, that expressed satisfaction with Clark County's compliance which further narrowed the scope of this hearing. The issues that were presented for the hearing on October 9, 1997, involved the size of the Camas urban growth area (UGA), UGA movement in general, resource lands (RL) that had been included in urban reserve areas (URA) instead of being designated, the capital facility plan (CFP), and stormwater. Briefing and oral argument were held contemporaneously with the compliance case of Clark County Natural Resources et al., v. Clark County, et al., #96-2-0017, (CCNRC II)</p> <p>That order was issued December 2, 1997 and held that: In this case, the WWGMHB held that "Clark County is not in compliance with the Act with regard to designation and protection of critical aquifer recharge areas. The existing protections are not consistent with Clark County's CP and or CFP. In order to comply with the Act, Clark County must adequately identify critical aquifer recharge areas and adopt development regulations that protect those identified areas. Clark County is not in compliance with the Act with regard to geological hazard area designations and has not adopted development regulations to protect those areas. In order to comply with the Act, Clark County must designate geological hazardous areas and adopt appropriate development regulations for their protection. Clark County is not in compliance with the Act because of its failure to designate fish and wildlife habitat conservation areas of local importance, its failure to establish a "review trigger" area surrounding priority habitat and species areas, its failure to apply development regulations to all priority habitat and species areas involved in conversion of forest lands to pasture lands, the exemption of subsection 2(a)(c) and (d) application to all priority habitat and species areas and its failure to provide adequate buffers for Type 1 through 5 waterways including Type 5 waterways in rural areas and its failure to provide a specific measuring standard for establishment of those buffer areas. In order to comply with the Act the County must make the appropriate FWH designations and adopt DRs that protect FWH."</p>	

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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				<p>County v. Western Washington Growth Management Hearings Board, Superior Court Case No.96-2-05498-8 Dated December 31, 1997 (Nichols I).</p> <p>Judge Nichols also issued a letter opinion on December 10, 1997, which formed the basis for the Remand Order dated December 31, 1997.</p> <p>On February 5, 1998, the WWGMHB issued a new Compliance Order and Order of Invalidity in response to Judge Nichols' ruling using Judge Nichols' burden allocation. In that Compliance Order and Order of Invalidity, the WWGMHB held that the County was out of compliance on the following four issues:</p> <ol style="list-style-type: none"> 1. Policies and development regulations (DRs) relating to future adjustments to UGAs (if different issue than the December 17, 1997, order) are not in compliance; 2. Policies and DRs to eliminate non-prime industrial designations in urban reserve areas as set forth in the November 22, 1996, order on reconsideration are not in compliance; 3. Failure to increase of the minimum density in rural areas north of the east fork of the Lewis River to an appropriate size that is greater than 5 acres is in violation of the GMA; <p>As set forth below, the original FEJS recommended 10-15 acre minimums in the rural zones.</p> <ol style="list-style-type: none"> 4. Failure to develop policies and DRs designed to buffer resource lands and limit encroaching development in rural and resource areas is not in compliance. <p>In addition, the Order also reaffirmed the Order of Invalidity as to CCC 18.302, 18.303, 18.305, and those sections of Ordinance 1996-05-01 relating to resource lands and rural lands as they substantially interfered with goals 1, 8, 9, and 10 of the Act.</p> <p>I have no records of what happened after this Order. There is not any further opinions that I have found addressing the issues that were subject of Judge Nichols' ruling.</p> <p>The WWGMHB affirmed that decision in an Order on Reconsideration issued April 30, 1998.</p> <p>Clark County took an appeal from that February 5, 1998 Order and April 30, 1998 Order on Reconsideration (and, again, CCCU participated in that appeal). The case was again assigned to Judge Nichols (Nichols II). Clark County v. Western Washington Growth Management Hearings Board, Superior Court Case No. 98-2-02032-0. On August 20, 1999, the Court issued a "Partial Judgment" solely as to the Order of Invalidity and stated that the Partial Judgment "overturned and overruled" the WWGMHB's Order of Invalidity that was part of the February 5, 1998 and April 8, 1999 WWGMHB Orders. The "Partial Judgment" was based on an Opinion by Judge Nichols dated July 1, 1999 that held that the County had discretion under GMA to use a 5 acre minimum rural lot size (1 unit per minimum 5 acres). The "partial judgment" was entered, the Order of Invalidity lifted as to all of the issues on the appeal and the 5 acre minimum lot size in the rural area remained.</p> <p>While the CCNRC appeal of the OFM issue from the Poyfair's ruling was pending in the Court of Appeals, and the other cases were pending in front of Judge Nichols, the County went to work to achieve compliance with Judge Poyfair's Order. As a result of the Poyfair Remand, the County engaged in an extensive public participation process as to both the Rural Activity Centers issue (which had been stripped from the original CP) and the Agri-Forest designation issue. These two components of the Remand involved 38,000 acres of land in the rural area that were eventually upzoned in order to obtain the variety of rural densities required by the Poyfair rulings.</p> <p>The WWGMHB held a compliance hearing on the Poyfair Remand on March 10, 1999, two days before the Court of Appeals issued its decision in the CCNRC appeal of Judge Poyfair's order regarding the use of the OFM number.</p> <p>This writer does not know why the hearing was held in March 1998 instead of March 1997 but as set forth in the body of the May 11, 1999 Compliance Order, the delay was attributed to the Petitioners Achen et al.</p> <p>CCCV filed a motion to dismiss the compliance proceeding on March 2, 1999 challenging the jurisdiction of the WWGMHB to hear CCNRC allegations that the County was still noncompliant because it had eliminated the Agri-Forest Zone and created the Rural Centers. In order to meet the public participation component that Judge Poyfair said was lacking in the original process, the County convened two separate Task Forces, one to evaluate the Agri-Forest designation and one to evaluate the Rural Centers designation.</p>	

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
223	David McDonald	9/14/15	2	<p>Therefore, the County is legally compliant with the Poyfair Remand.</p> <p>Ms. Levanen's Claims/E-mail</p> <p>The County is also factually compliant with the "Poyfair Remand". Ms. Levanen asserts that because the Compliance hearing in March 1999 only addressed the Agri-Forest and Rural Centers issues, it failed to address whether the County was now in compliance with all portions of the issues remanded to the County as part of the Poyfair Remand. Nothing could be farther from the truth.</p> <p>The foundation of Poyfair's Orders was that because the county added in the Agri-Forest designation and excised the rural centers at the 11th hour of the process, it skewed the rural designations and failed to comply with the GMA. By going back and meticulously and painstakingly going through a very contentious process, for all intents and purposes, the County eliminated the Agri-Forest Zone and created larger Rural Centers than had been initially contemplated.</p> <p>Ms. Levanen says that because the other issues were not addressed by the WWGMHB, they are presumed non-compliant. Her claim is legally false and ignores the fact the CCCU did not want the WWGMHB to review the County's compliance because it was in favor of CCCU. If CCCU felt that the County was non-compliant at that time, instead of trying to prevent the WWGMHB from determining compliance, CCCU could have easily, as they were doing in multiple appeals, they could have raised all of those issues at that time. CCCU cannot now claim no compliance after forfeiting the rights to request the WWGMHB to find non-compliance and attempting to stymie the WWGMHB from hearing the compliance issues that were raised by CCNRC.</p> <p>The basic principle is that the burden is on the party claiming noncompliance to show the County is non-compliant. See Order date December 31, 1997 (Nichols I) and Compliance Order and Order of Invalidity dated February 5, 1997 (holding that Superior Court held that burden is on party asserting non-compliance to prove County is non-compliant-precursor to Nichols II). However, once a finding of Invalidity has been made by the WWGMHB, the burden is on the party challenging invalidity to prove that Invalidity is not appropriate.</p> <p>Therefore, all CCCU had to do was to assert and prove that the County was not in compliance with Poyfair's Order at any Compliance hearing (and the March 10, 1999 would have been the logical one because all parties were present and the WWGMHB was trying to determine if the Comp Plan was now in compliance with the GMA by striking the Agri-Forest Designation and creating the Rural Activity Centers). As stated, the elimination of the Agri-Forest designation, and creation of the Rural Centers, were two of the main components of the Poyfair Order. Judge Poyfair's Order states "The eradication of the centers (rural centers) violates the planning goal requiring a variety of residential densities." So, the County put the Rural Centers back in, and expanded the boundaries of those Centers. The County's position in front of the WWGMHB was that the removal of the Agri-Forest designation along with creation of the Rural Centers brought them into compliance with Judge Poyfair's Order and CCCU agreed implicitly and explicitly.</p> <p>Ms. Levanen also claims that the County is out of compliance with the Poyfair Remand regarding SEP A. She is again, factually and legally incorrect. Although, it is not clear if the County did a supplemental FEIS on Remand, there was no need for the County to conduct such a review because the FEIS was only found to be inadequate because the analysis: 1) failed to include an analysis of the Agri-Forest designation and 2) failed to address the exclusion of the Rural Centers. Once the County eliminated the Agri-Forest designation, and put the rural centers back into the Comprehensive Plan, there was no longer a SEPA violation. Moreover, the County's Comprehensive Plan has had to comply with SEP A since the Remand in 2004 and 2007. There have been no challenges to the SEP A analysis of which I am aware and therefore, it has complied with SEPA.</p> <p>Ms. Levanen states that "They"</p> <p>This writer believes that she is referring to the WWGMHB.</p> <p>timed the Compliance decision to happen just after the Court of Appeals decision of 1999, counting on CCCU's attorney not being available to protest the remand action". This statement is not only factually incorrect, the record shows the opposite occurred and CCCU and their attorneys participated fully in all of the proceedings.</p> <p>No one outside the Court of Appeals knows when the Court is going to release its opinions. Therefore, the WWGMHB would not have known when the Court of Appeals was going to release its opinion in the CCNRC appeal of Judge Poyfair's Conclusion of Law. Even if the WWGMHB had that knowledge, it is irrelevant because the Compliance Hearing occurred on March 10, 1999, two days before the Court of Appeals released its opinion. Moreover, any claim that the CCCU attorney's ability to act was compromised in anyway is unsupported given that CCCU's attorney filed the motion to dismiss on March 2, 1999, 8 days before the Compliance Hearing and 10 days before the Court of Appeals issued its decision. In addition, CCCU's attorney appealed the Order from the March 10, 1999 Compliance Order.</p> <p>Therefore, Ms. Levanen's claim that the timing of the Compliance hearing was compromised by the issuance of the Court of Appeals' opinion is totally unsupported since CCCU filed motions to dismiss the compliance hearing, and participated in the compliance hearing, before the Court of Appeals rendered its decision.</p> <p>Ms. Levanen states that, "The Plan in place today, is the same plan that was adopted in the rural and resource land in 1994. It has never been changed and after over twenty years, legitimate changes must be made." This is patently false. The 1994 plan had 35,000 acres of Agri-Forest land designated. After the Poyfair Remand, all but 3,500 acres of that land was removed from Resource Land.</p> <p>The WWGMHB decision which disallowed the 3500 acres was appealed to the Superior Court by CCCU whose attorney filed a Motion For Judgment on the pleadings (Bennett Appeal) that the Court granted and then remanded to the Growth Board to consider in light of the Supreme Court case in Redmond. This writer is still unclear if the 3500 acres remained in resource land designation or reverted to 5 acre rural designation.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
				<p>The 1994 plan eliminated Rural Centers, which were reinstated as part of the Poyfair remand and are now part of the current Comprehensive Plan that has been found compliant.</p> <p>There are now a variety of rural densities in the Comprehensive Plan as evidenced by 3000 acres in the Rural Centers and the elimination of the Agri-Forest Resource lands. Moreover, in 2007, thousands of acres of resource land was redesignated and put into the Urban Growth Areas and/or annexed into city boundaries. New development regulations changed the way that the County dealt with timber lands and, in some cases, allowed conversion of those lands to non-resource development.</p> <p>The County convened a Forest Conversion Task Force that consisted of myself, three local tree farmers, a representative of DNR and a representative of WDFW and that Task Force developed a comprehensive set of regulations for protection and conversion of forest lands.</p> <p>All of these changes, among others, have occurred over the 21 years since the original passage of the 1994 plan.</p> <p>Finally, any claim that the voices of the rural residents have not been heeded since the inception of the GMA process is factually unsupported. The County originally planned for 10-15 acre rural minimum lot sizes (not for resource lands but for just the rural zone). If one goes back and looks at the original FEIS</p> <p>The Final EIS for the County's Growth Management plans focuses its attention on Alternatives Band C. Alternative B provided for 10 acre minimum lot sizes north of the East Fork of the Lewis River, and Alternative C provided for 15 acre minimum lot sizes north of the East Fork of the Lewis River. See, FEIS at II-11, 15. In support of the 15 acre rural lot size, the FEIS states at 11-16 "minimum lot sizes in rural areas (15 acres) and for resources land would be larger and reflect the recommendation of the Washington State Department of Natural Resources (DNR)) and DCTED for minimum lot sizes in resource lands.</p> <p>The PETS also included an Alternative A, which was a continuation of the County's existing policies, including 5 acre lots. However, the FEIS concluded that continuation of the County's then current Rural Land Use Policies would not be consistent with the County's Community Framework Plan, nor the intent of the GMA. As the FEIS indicates at II-8 under Alternative A the policies of the adopted Comprehensive Plans would remain in effect. "This alternative may not meet the intent of the CFP (Community Framework Plan), and would be difficult to reconcile with the intents of the GMA to concen</p> <p>The County staff had originally recommended either 10 or 15-acre minimum rural residential lot sizes north of the Resource Line (East Fork Lewis River). but that was ultimately rejected. In addition, the original Wetlands Ordinance was dramatically changed after an outcry from organized groups from the rural area led by Chuck Cuslunan. Moreover, there were many rural stakeholders on the Task Forces that were appointed as part of the Poyfair Remand and those voices spoke in the various reports that were issued.</p> <p>Lonnie Moss, one of the founders of CCCU was also a member of the County Planning Commission during the remand period.</p> <p>Public hearings went long into the night and, in an effort to have more rural stakeholders present at those hearings, some public hearings were held at LaCenter High School rather than in downtown Vancouver. Certainly, there were many, many issues with the development of the original plan. Citizens, the County, the WWGMHB and the Courts were all trying to interpret what the real requirements of the GMA were and how to comply. In addition, as the County was going through its processes, amendments were being made to the GMA in the legislature and after almost 6 years, the 1994 plan was compliant with all of the directives of the courts and with the tacit or explicit assent of all the parties.</p> <p>Thank you for allowing me to comment on the history of the County's actions and the claims being made by CCCU. Please submit these comments to the record on both the Comprehensive Plan update and the DSEIS. I hope staff, the Planning Commission Members and the Board of County Councilors find this to be of assistance as they weigh the issues in front of them.trate urban development in cities".</p> <p>The FEIS goes on to note the virtues of large rural lot sizes north of the East Fork of the Lewis River. As it states at III-9:</p> <p>Alternative B would protect rural and resource lands from urban types of development. Areas outside of designated UGAs would not receive urban levels of service. Lots in rural areas would be a minimum of five acres in size in the southwestern portion of the County, and 10 acres north of the East Fork of the Lewis River and east of 1s2nd Street. This would allow residents to keep animals and engage in small-scale farming and resource-based industries such as commercial forestry, Christmas tree operations, dairying, berry farming, orchards, and mining . Supporting commercial and public uses would be concentrate d in designated Villages or Hamlets. Rural lands would also serve as buffers between resource lands and urban areas.</p> <p>that Ms. Levanen mightly claims should have been redone, it is apparent that the rural people eventually convinced the county and the courts to reduce those minimums to the 5-acre minimum that the County ultimately imposed that minimum lot requirement.</p> <p>Although the WWGMHB found the 5 acre rural zone non-compliant and issued an Order of Invalidity, Judge Nichols reversed that Order (Nichols II).</p>	

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
063	Dawn Doutrich	9/5/15	1	Part of this process started off with a "survey" from Clark County asking 20 acre parcel owners, "would you like choice" about how you develop your land. As a 20 acre parcel owner, rather than being asked "would you like choice", we should instead be asked "would you like to pay more in taxes"? Even if we don't want to subdivide, with Alternative 4 the county will split our acreage and if our contiguous neighbor wants to subdivide, our parcel will become "worth more" and we and our neighbors will be charged more in taxes. This is one of the ways people on fixed incomes are pushed off their land. They can no longer afford the taxes or are forced to develop, pushing the build and develop agenda rather than a sustainable, smart growth, or policies that value preservation of green spaces.	The survey you are referencing was conducted as part of the Rural Lands Review in 2013. In November 2013, owners of AG-20 parcels larger than 10 acres and FR-40 parcels larger than 20 acres received letters asking for their preferences to guide the BOCC in their decision as to whether or not changes to the County's rural lands policy were needed. Although these suggested changes have been incorporated into the 2016 Comprehensive Plan Update, it is not considered part of the Draft SEIS process. For more information, please visit www.clark.wa.gov .
063	Dawn Doutrich	9/5/15	2	We know that health is improved when we plan for growth and develop in ways that offer walkability, community, and green space. When uncontrollable growth occurs in the body, we call it cancer. Having 12,000 new building sites (alternative 4) is an invitation to a malignant quality of life.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
063	Dawn Doutrich	9/5/15	3	We need land dedicated to agriculture, wetlands that offer fish and habitat health to birds and wildlife. This area is one of the most beautiful places in the world. We need to preserve this county and keep it a green, healthy, and livable place for ourselves and our children. For these reasons I support Alternative 1.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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083	Deborah Folkerts	9/17/15	1	After attending several public meetings regarding the 4 proposals. I urge council to consider adopting Plan#. 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 consummative on this LIMITED resource, and creative in other ways for job growth and housing to meet the increase need of the population.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
062	Deborah Nelson	9/15/15	1	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.	Thank you for your comment. The County is obligated by law to update its comprehensive plan by June 30, 2016. In order to meet this deadline, the County must promptly select a preferred alternative so that the Final SEIS, Draft Comprehensive Plan Update, and Final Comprehensive Plan Update can be completed before the end of June. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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062	Deborah Nelson	9/15/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.
062	Deborah Nelson	9/15/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
062	Deborah Nelson	9/15/15	4	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
094	Den Mark Wichar	9/16/15	2	not enough preservation of farmland	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
094	Den Mark Wichar	9/16/15	3	not enough impact fees from developers	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
094	Den Mark Wichar	9/16/15	4	not enough protection for & planting of trees	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
094	Den Mark Wichar	9/16/15	5	too much land for irrationally-big mansions too much tax-free land for mega-churches	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
204	Dennis Dykes	9/10/15	1	Please accept these comments concerning the draft EIS prepared to inform decisions concerning 2016 Comprehensive Growth Management Plan update. I am a landowner living on and managing 65 acres of land designated FR40 although portions of this land have historically been used for agriculture. I have lived here for 25 years. Professionally I am a geologist licensed to practice geology and hydrogeology in Washington. I have also completed a Permaculture Design Certificate course which I am using to develop an integrated agriculture and forestry plan for my land.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
204	Dennis Dykes	9/10/15	2	General: I found the analysis to be rather vague and generalized. It will be hard based on this level of analysis for the planning commission and council to make informed decisions about the plan. It is simply inappropriate that a "preferred alternative" be crafted from this analysis alone. Of particular interest to me are Alternatives 2 and 4 which will cause the most environmental degradation in the rural areas and reduce most of the economic opportunities currently available. These alternatives include wholesale changes to land use policies which are briefly described, were not developed through a public process, and are incompletely analyzed. A footnote to Table 1-2 states that forest land in the current use program is excluded from the VBLM model. This means that my land, and I would think most land zone for forestry, has been excluded from the analysis. This should be unacceptable to staff and the decision makers.	Impacts assessed at the programmatic level tend to be more general due to lack of knowledge about specifics regarding how the development would actually occur. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative. Only land zoned Forest Resource that is not currently in use for timber production is included in the Vacant Buildable Lands Model.
204	Dennis Dykes	9/10/15	3	The analysis also considers most potential environmental impacts mitigatable but provides no evaluation of the costs either to the landowner or taxpayers. For example under Alt 4 my land could go from one parcel to at least 6, possibly as many as 13. What would the cost of environmentally friendly roads as well the restrictions on how each parcel is used cost me should I subdivide? What would the cost of just going through the subdivision process be? What would the public infrastructure cost associated with all these lots and new houses be? For example, the bridge over the East Fork at La Center will soon reach capacity and a second \$20 million bridge is proposed. What will it cost to upgrade Jenny Creek Road to access this bridge from my property? What will the impact fees be? This is a winding narrow road adjacent to the creek and it will be very expensive to mitigate the environmental impacts of any improvements. I'm sure this scenario is repeated throughout rural Clark County.	Costs and revenues are an important component of the comprehensive planning process and the Capital Facilities Plan (CFP) is a GMA requirement. The intent of the SEPA process (in this case a supplemental EIS) is to document in a general sense what the potential environmental impacts might be from the various alternatives. The CFP is currently being developed based on the Preferred Alternative. The CFP will be part of what is adopted, and it will be part of the public deliberation. The degree to which a property split into multiple parcels would incur additional taxes would depend on the associated increase in assessed property value.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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204	Dennis Dykes	9/10/15	4	<p>Soil: The CCCU has raised concerns about the accuracy of the characterization of soil in the draft EIS. As a licensed hydrogeologist I have used the various sources of information about soil identified in the draft EIS and by the CCCU. The OMA has clear definitions of soil characteristics that it is in our interests to protect. These have been used to guide previous planning processes and in previous EISs so I have trouble understanding how the maps presented in the draft EIS could suddenly have significant errors. The CCCU does identify a soil type that is characterized as very good for forestry but is excluded from the maps. I do suggest that staff double check this. Current GIS technology makes this process relatively straight forward although checking the accuracy is always necessary.</p> <p>The suitability of soil in Clark County for farming and forestry is well established and should not be in question. The decline in agriculture described by the CCCU is related to a lack of leadership and the promotion of incompatible land uses (residential, commercial and industrial) in Clark County. It's an accepted fact that near urban agriculture typically includes higher value crops and benefits from the large nearby markets. Any business will recognize this as a great combination. Agriculture is in transition as the urban population becomes more aware of where their food comes from. We need a land use plan that encourages the kind of people that want to be part of and benefit from this trend, not a plan that promotes residential land uses above all else. Strong and stable zoning is fundamental to a long term business. Would any industry build a facility on land where the zoning could be change to residential? The data cited by the CCCU identifies and describes a problem that the leaders in Clark County need to address to promote this valuable sector of the economy. Forestry would also be served by promotion of local value added industries. The economy of Clark County would benefit more than by simply sending logs to China. It's obvious, as the CCCU acknowledges, that trees grow here.</p>	Prime agricultural soils are discussed in Section 2.1 and shown on Figure 2-1 of the FSEIS. The soils data presented in the DSEIS and the FSEIS comes from the most recent available data: the 2009 USDA SURRGO dataset. This source has been added to the figure, and the text has been revised to increase clarity. New soil data since 2007 does not change the general understanding of the soil conditions or surface geology in the county.
204	Dennis Dykes	9/10/15	5	<p>Water resources: This is something I am knowledgeable and passionate about.</p> <p>Surface Water- I was shocked by the increase since 2007 in 303(d) listings included in Appendix A. The draft EIS glosses over this, barely mentions the additional listings and balances it with the very few delisted. This is not appropriate and needs to be corrected. A casual review of Appendix A shows that more streams have been added to the list or additional parameters add to a listed stream than there are streams with no change. The type of land use in a watershed is the main cause of the degradation of water quality. This analysis suggests that even Alternative 1 will substantially increase the degradation of surface water in Clark County as occurred between 2007 and 2012. Clark County recently lost a lawsuit that cost taxpayers (not the developers that benefitted financially) well over \$3 million because it chose to avoid managing stormwater as high up in watersheds as possible. With this in the background, rural landowners will be expected to manage stormwater much more in the future. Alternative 1 shows that current requirements are not working even through the development slow down caused by the recession. The draft EIS must include a detailed analysis of this issue and what mitigations will be required and their costs to both the landowners and taxpayers. The over 65,000 acres, nearly a sixth of Clark County, affected by additional parcelization in Alt 4 is a serious potential impact that would be expensive to mitigate.</p> <p>Groundwater- the draft EIS correctly identifies the availability and quality of ground water as requiring evaluation. Unfortunately the discussions of each are vague and generalized. Detailed analysis and quantification of potential mitigation needs and costs are not provided. It is well known that the yield of wells in the rural areas most affected by Alternatives 2 and 4 is often quite low and inadequate requiring additional costs for development. Subdivisions have been required to install expensive water systems to assure water to all lots. Additionally wells in many areas are contaminated with naturally occurring arsenic, sulfur compounds, manganese and excessive iron as well as nitrates and occasional or recurring bacterial contamination which affect the use of the water. These conditions have led to requirements to prove the availability and quality of the water supply before subdivision or the issuing of building permits putting the government in the position of potentially denying a land use.</p> <p>The impact of the addition of many thousands of wells must be more thoroughly analyzed. The simple feasibility of the addition of so many wells, the affect of withdrawing that much water on springs, wetlands, streams and ponds as well as the potential risk of widespread aquifer failures should be quantified. These potential problems would be most cost effectively mitigated by rejecting Alts 2 and 4 and continuing Alt 1. Without additional analysis it's impossible to say Alts 2 and 4 would not cause significant problems.</p>	Impacts assessed at the programmatic level tend to be more general due to lack of knowledge about specifics regarding how the development would actually occur. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.
204	Dennis Dykes	9/10/15	6	<p>Fish and Wildlife Resources: My expertise only peripherally includes these resources. It is clear, however, that these resources are dramatically affected by residential development, agriculture and forestry.</p> <p>Of these, residential development has the greatest impact. This is because people manicure and maintain a substantial area around their houses and in rural areas have long access roads or driveways. These practices often include the use of pesticides and fertilizers at higher rates than on farms and forests and each house will have a septic system that can also impact water quality. The draft EIS minimizes the impact of parcelization on these resources by saying without documentation that "More common species are likely already accustomed to some level of human disturbance ... ". More detailed analysis is needed: what species, what roles do they play in the ecosystem, what ecosystem functions are lost by exclusion/loss of the other less common species? The conditions created by development affect water flow through the ecosystem, fragment habitat, and create conflicts between people and wildlife. We all have stories about how deer and elk ravage landscaping and if anyone sees a bear or cougar it makes the news. These problems often lead to exclusion or elimination of wildlife as well as the more subtle degradation of habitat to the point where wildlife cannot survive or avoid an area. Minimizing the intrusion of residential development is the only effective way to mitigate these impacts. Agriculture and forestry can continue with practices that can minimize these impacts at little cost. In fact, a healthy diverse ecosystem grows the best trees at the least cost because the system supplies and supports itself. Inputs to agriculture can also be minimized through diversity reducing potential impacts on the ecosystem. These are also the kinds of changes to agriculture that urban residents are looking for in their food supply.</p>	Impacts assessed at the programmatic level tend to be more general due to lack of knowledge about specifics regarding how the development would actually occur. Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative.
204	Dennis Dykes	9/10/15	7	Other Issues: The draft EIS addresses a number of other areas of potential impact including land and shoreline use, energy, transportation and public facilities. Each describes the logical increase in impact caused by more parcelization in the rural areas. Arguing that this isn't the case would be nonsense. What the draft EIS lacks is quantification of these impacts and the costs of mitigation <u>both in money and how people use the land.</u>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
204	Dennis Dykes	9/10/15	8	Conclusion: The draft EIS is vague and lacks enough detail for the planning commission, the council and the wider community to make an informed decision about a preferred alternative. If this is as good as an EIS gets then it is clear that the potential impacts of Alternatives 2, 3, and 4 are greater than Alternative 1. The CCCU has attempted to provide additional information to support Alternative 4 but this information includes too many assumptions, rhetoric and extraneous information to overcome the obvious and substantial impacts of this alternative.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
204	Dennis Dykes	9/10/15	9	Of equally great concern is the fact that Alternatives 2 and 4 require major changes to policies that were developed through public processes. It would be a corruption of the public process to include the elements of Alternatives 2 and 4 that change policy without a public process. The Community Framework Plan (CFP) which is described on page 6-3 (Section 6.1.2) was developed through a community process that included rural residents. It describes a desire and expectation that there will be a clear difference in character between rural and urban Clark County. It set a goal of 10% rural residents and 90% urban residents. The last figures I have seen show this ratio is about 11% to 89%, a bit off the goal. The EIS does not acknowledge the specific goals of the CFP, evaluate their status, nor evaluate the effect of these goals on the environment. These goals were agreed to by the community to allow the rural resource based economy to continue with the least amount of interference from land use conflicts and government as well as to make the provision of public services as cost effective as possible. This is the best way to keep government costs and taxes down.	Review of this SEIS and the subsequent review of the Comprehensive Plan update is considered to be a public process. The SEIS does not discuss specific goals of the CFP, evaluate their status, or evaluate the effect of these goals on the environment because the goals of the CFP will be based on the Preferred Alternative selected during this SEPA process.
160	Donald Mclsaac	9/17/15	1	Please consider these comments on 1) the preferred alternative you are scheduled to select on October 20, 15 to update Clark County's Growth Management Plan, and 2) the draft Supplemental Environmental Impact Statement analytical document. Recommendation for a Preferred Alternative We recommend a properly adjusted Alternative 4 as your most reasonable choice for a preferred alternative. I won't repeat here the verbal testimony in support of this recommendation made by myself on September 3, 2015 and my son Adam Mclsaac on September 10, 2015 on behalf of our extended family and various neighbors; I understand this is part of the electronic record and you are able to review it at your convenience. However, some key justifications for this recommendation include the following: <ul style="list-style-type: none"> • There have been no growth management policy changes for rural areas in the past 20 years since the 1994 Comprehensive Management Plan, including the 2007 update process. Adopting Alternative 1 would be a decision for no policy changes for another 20 years. It is not reasonable to freeze rural areas with no policy changes for a period of 40 years. • Alternative 2 is only slightly different than Alternative 1, and is also not reasonable for rural areas. • Providing for the limited policy changes in Alternative 4 provides for important social and economic benefits in rural areas, in a manner consistent with goals and objectives in the Growth Management Act. • Criticisms and concerns about possible negative effects of Alternative 4 you have heard in public testimony about Alternative 4 are inaccurate and exaggerated. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
160	Donald Mclsaac	9/17/15	2	In terms of general area refinements of the Alternative 4 as currently described, there are areas in the Hockinson and La Center rural areas where additional changes to FR-10, AG-5, and R.2.5 should be implemented to achieve better alignment with the predominant lot size of the subarea in a manner consistent with the local rural character.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
160	Donald Mclsaac	9/17/15	3	The draft SEIS represents a concedable initial draft of some of the analytical requirements of SEPA, but needs considerable additions and adjustments between this draft stage and a final SEIS to effectively serve as a neutral analysis of the environmental impacts four alternatives in the context of Growth Management Act, other applicable law, public input, and the policy decision making authority of the Board of Councilors. When you review all the comments received during this open comment period and consider how to advance this draft to a final analytical document on October 20, 2015, it is appropriate to task staff with making the necessary adjustments, corrections, and additions to insure that the document adequately supports review by State authorities of the preferred alternative.	The County is considering all comments provided during the DSEIS review period. Changes were made to the document necessary and/or additional information needed to be provided for clarity, and published as the FSEIS.
160	Donald Mclsaac	9/17/15	4	We cannot submit an extensive or detailed list of problems and recommended changes to the draft SEIS document, given the short time provided for a private citizen with previously scheduled obligations during the August 15 -September 17, 2015 timeframe.	The County provided a 30-day comment period, as required under SEPA. We will continue to accept comments for the entire duration of the project; however, they will not be included as part of the public record for comments on the Draft SEIS.
160	Donald Mclsaac	9/17/15	5	Additional Growth Management Act context needs to be added, particularly with regard to its provisions that speak to the consistency of Alternative 4 with Growth Management Act goals and objectives.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
160	Donald Mclsaac	9/17/15	6	There are various locations in the document where the neutrality of the narrative can be questioned, with a bias towards maintenance of status quo (Alternative 1). This important document needs to be completely balanced with regard to existing or omitted statements that achieve this.	Thank you for your comment. It is the aim of the County to be as objective as possible during its assessment of the environmental impacts. However, part of the SEPA process is to determine whether or not an alternative has significant impacts to the natural or built environment. The County has made these judgements based on the best available science, and intends to use this assessment to inform its selection of a preferred alternative. The County will review the Draft SEIS and will remove any unintended, bias language if it is encountered.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
160	Donald McIsaac	9/17/15	7	A thorough review for numerical inconsistencies, such as the number of buildable lots cited early and later in the document, needs to be completed and all errors corrected. There appears to be a number of technical corrections needed, such as the count of buildable lots in Alternatives 1, 2 and 3. It appears many lots without buildings on them are counted as buildable, even though they are in unbuildable areas as a result of protective regulation or natural configuration.	Numerical errors have been corrected and updated information included in the FSEIS. Please see Chapter 1 of the FSEIS for an amended description of the development potential under the Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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160	Donald Mclsaac	9/17/15	8	Ranges around the various assumptions, such as those listed in Table S-1, need to be presented, and information on very recent trends since the turn-around of the 2008 economic recession also need to be presented.	The County has undergone an extensive process, including a third-party technical review, of the Planning Assumptions listed in Table S-1 and in Chapter 1 of the FSEIS. These Planning Assumptions have been vetted and adopted by the BOCC for use as the basis of the 2016 Comprehensive Plan Update and this environmental analysis.
160	Donald Mclsaac	9/17/15	9	Greater detail needs to be included on the justification basis for Alternative 4. Great detail needs to be included in the rationale for the inclusion of the rural changes included in Alternative 2.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
160	Donald Mclsaac	9/17/15	10	Context of the social and economic benefits of policy changes need to be included, as well as specific analysis.	Per Washington Administrative Code 197-11-444, socioeconomics are not considered to be elements of the environment under SEPA.
160	Donald Mclsaac	9/17/15	11	Consistency of the alternatives with other Comprehensive Management Plans of other counties in Washington State should be added.	The comprehensive planning process is conducted at the county and city levels specifically so that they can cater to each community's unique circumstances and needs (i.e. King County versus Pend Oreille County). It would defeat the purpose of having separate comprehensive plans if they had to be consistent with the rest of the comprehensive plans for Washington State counties.
160	Donald Mclsaac	9/17/15	12	Again, this is not to be viewed as a complete list of areas that should be addressed to make for a more accurate, neutral, and thorough analytical document. We encourage you to task the staff with a full review and attention to at least these areas.	During the development of the FSEIS, Clark County considered all of the comments on the DSEIS and revise the document to ensure the FSEIS is an accurate, neutral, and thorough analytical document.
160	Donald Mclsaac	9/17/15	13	There is a perspective that only natural environmental impacts should be included in SEIS of this nature. While the final SEIS should include descriptions of such effects, as is in the current document, there is no limitation of providing additional analysis useful and appropriate to you in your selection and defense of the preferred alternative. However, if you deem it is inappropriate to include such information as social and economic benefits, analysis of policy consistency with the Growth Management Act within the SEIS document, you should task staff with providing independent White Papers on these important topics.	Analysis of policy consistency with the GMA is provided throughout the DSEIS. Although the County will consider your request for a socio-economic analysis, such an analysis in the form of a EIS section or a technical white paper, is not required under SEPA.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
066	Emelie McKain	9/16/15	1	<p>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.</p> <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
066	Emelie McKain	9/16/15	2	<p>Alternative 3 will bring an additional 78 acres of valuable fish and wildlife habitat conservation areas into potentially developable areas 1. This amount of disturbed habitat is significantly less than Alternatives 2 & 4 which at a maximum provide 65,500 acres for potential development1.</p> <p>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.</p> <p>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 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.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
066	Emelie McKain	9/16/15	3	<p>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.</p>	The County also values its relationship with WDFW and appreciates WDFW's involvement in the 2016 Comprehensive Plan Update process.
021	Eric Hale	9/17/15	1	<p>One of the most attractive aspects of living in Clark County is its rural character. Alternates 2 and 4 don't do enough to preserve this beautiful and productive area and 4 even contributes directly to it's decline.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
021	Eric Hale	9/17/15	2	<p>Alternate 1 seems to maintain the best aspects of our quality of life</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
021	Eric Hale	9/17/15	3	<p>I do see some benefit in the ability of cities to expand their urban growth area limits in Alternate 3.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
021	Eric Hale	9/17/15	4	<p>As much sympathy I may have for farmers who wish to sell part of their land during lean years, development is a one way process and those broken up lots can't be reasonably restored when times are good again. The resulting slapdash development pattern puts too great a strain on planning and services which the underlying property tax gains from the new lots will never be able to support. It also severely limits the ability of the area to attract large companies who need contiguous land for large projects that create jobs. The resulting 1-5 acre lots created by this pawnshop technique of farm preservation are too often changing prime farmland into giant lawns with giant houses. This puts further strain on the remaining farms for such issues as water rights and creating sprawl.</p>	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS. Please also see Chapter 3 of the FSEIS for additional information on water supplies in rural Clark County.
116	Erin Erdman	9/10/15	1	<p>Attached is a letter with our comments supporting Alternative 3.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
028	Evan Marttila	9/10/15	1	<p>I was unable to make it to the hearing tonight, but I would like to let you know that I support alternative 4.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
077	Garret Hoyt	9/17/15	1	<p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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077	Garret Hoyt	9/17/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
077	Garret Hoyt	9/17/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
167	Gerry Coppedge	8/24/15	1	I am the current owner of two (2) parcels of land located at approximately 5700 NE Landerholm Rd., LaCenter, namely: xxxx I acquired this property through a bad debt from John Morris who originally owned a total of 65 acres. He had already separated a 10-acre parcel through a boundary line adjustment and had sold that parcel upon which a house with a horse arena was constructed by the present owner, Cory Kjose, before my possession of the property in 2008. Before I agreed to accept the two parcels, I had completed my "due diligence" through talking with all the governing offices and I was assured that I would be able to either sub-divide, short plat or "cluster" my property into smaller segments to achieve the best use of the property. This property is covered with scrub trees, blackberries and other wild undergrowth and is unconducive to any productive use other than residential or agricultural. I attended two public meetings in which the four alternative plans were presented regarding the committee's future plans for several areas in Clark County. My questions and my search for answers are limited to the area in and around LaCenter. According to county records, my two parcels are zoned R-20 with at least one of the alternative proposals going to RL. I do not completely understand the distinction among the classifications of RL, Agricultural or Forest land; why they exist and how they can change depending on the use that is granted. When John Morris divided the 65 acres into three parcels in May 2008, how did that R-20 designation allow for a 10-acre parcel? In addition, approximately 18 parcels (see attached Exhibits 1 and 2) were already established beginning approximately 1985 (according to County Dept. employees). These parcels seem to reflect between 1 acre, 2.5 acres and 5 acres each and are immediately adjacent to the eastern boundary of my two parcels with ingress/egress located from 60th Ave., 59th Ave. and 31 5th St.. Also, to the immediate west of my property at approximately 5617 Landerholm Rd. there are three parcels: 1 approximately 6.5 acres with an existing house located on the property and 2 parcels approximately 5 acres each, all owned at one time by Dave Pettit, both 5-acre parcels having received building permits in the last 6 months with houses currently being constructed on each parcel. In addition, there are properties located just off Lockwood Creek Rd. on NE 40th Ave. which are 5-acre "horse properties" as well as approximately eight properties located on NE Landerholm Rd. that appear to be 5-acre "horse properties" with very nice newer homes and surrounded by white fencing. I question why is my property currently zoned R-20 with proposed zoning to RL when I am surrounded by adjacent properties ranging from 1 acre to 2.5 acres on the east, two 5-acre parcels and one 6.5 acre parcel adjacent to the west with several nearby 5-acre properties on Landerholm Rd. and 40th Ave.?	This analysis is a programmatic review of the potential environmental impacts of the Comprehensive Plan update, and as such does not have the ability to look at impacts on the parcel-level. It is likely that the current zoning in your immediate area was, in part, due to the requests for zoning variances. Parcel-specific applications for zoning changes and/or zoning variances may be made to the County.
167	Gerry Coppedge	8/24/15	2	I have public water as well as power serving my 20 and 35-acre parcels running along a road easement approximately 900 to 1,000 feet from Landerholm Rd. An increased tax base through new jobs and new housing can help alleviate the costs for more public services such as roads, schools and public safety services. The permitting process can control new construction and the "urban sprawl" as voiced by opponents to Alternative 4. Development fees can help the County recover some of those costs.	Thank you for your comment. It will be reviewed and considered during the development of the Final SEIS.
167	Gerry Coppedge	8/24/15	3	One argument I repeatedly hear from those involved in the planning process is the criteria for job growth and income from development. If large rural tracts are allowed to downsize, as desired by thousands of rural property owners, building permits and the construction of new housing as well as an increased tax base will only help the economy of small towns as well as the County. In the case of LaCenter, one planner reiterated that they were looking at job and economic growth. And as you know, it was the County that allowed for the approval of the Indian casino, stating job and economic growth for the region. Job and economic growth will require more housing and downsizing rural properties will allow for housing for future employees who choose to live where the jobs are located. It will be interesting to see how the properties west of the city of LaCenter and extending west to I-5 and beyond is going to be zoned to accommodate the Cowlitz Indian Tribe and the commercial development surrounding the proposed casino.	Thank you for your comment. It will be reviewed and considered during the development of the Final SEIS.
167	Gerry Coppedge	8/24/15	4	Before many of the public hearings were held regarding the Comprehensive Growth Management Plan, an article published in the Columbian indicated that two leading candidates for Clark County Chair had already established preferences for Alternatives 1 or 2 and had criticized Madore for his Alternative 4 proposal. They appeared to have made their decisions even before hearings scheduled for Sept. 3 and 10 are held. "Alternative 4 proposes to correct the massive mismatch between the actual rural land and the inappropriate zoning map that was imposed 20 years ago," as stated by Madore. Alternative 4 will address the hardships created by the 1994 Comprehensive Growth Plan that created too many large lots, resulting in severely limiting the ability to subdivide, either for sale or designating to children. It has already been stated that Alternative 4 puts the county at risk of legal challenges over noncompliance with the Growth Management Act. There will also be considerable legal challenges by those harmed should Alternative 4 not prevail. It would seem grossly unfair for the County to mandate an alternative plan that would restrict property owners from utilizing the highest and best use for property that is already situated in an area already developed as residential, especially as there is no real viable alternative for economic use. As Clark County Citizens United has stated, the goals of respect for property rights, affordable housing and rural economic vitality should not be slighted. Development of property into housing would not only provide for jobs and housing but would put increased property tax money into the County coffers. The planners should not boldly assume that rural landowners are to be preservationists and charities but should have the right to utilize their property as they deem fit, whether it be for housing or merely to divide to pass on to their heirs.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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110	Greg and Jae Weber	9/17/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
110	Greg and Jae Weber	9/17/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
110	Greg and Jae Weber	9/17/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
110	Greg and Jae Weber	9/17/15	4	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
110	Greg and Jae Weber	9/17/15	5	There is a strong movement for small rural farms, which I support for those who wish to do this, but make it VERY CLEAR, this is a way of life--not a livelihood. Purchasing property for look 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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
110	Greg and Jae Weber	9/17/15	6	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
110	Greg and Jae Weber	9/17/15	7	I wish also to grant the county access to Whipple Creek for a future trail system.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
110	Greg and Jae Weber	9/17/15	8	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
110	Greg and Jae Weber	9/17/15	9	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 your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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026	Greg Nelson	9/17/15	1	To meet the June 16, 2016 required update of our 2007 Growth Management Plan I support the adoption of Alternate #1.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
026	Greg Nelson	9/17/15	2	Alternates 2 and 3 do not adequately address the community costs and lifestyle impacts that will result from encouraging urban sprawl. In particular, will our limited water supply and the increased value of rural land spell the end to nearby small farms?	Per Washington Administrative Code 197-11-444, community costs and lifestyle impacts are not considered to be elements of the environment under SEPA. Additional discussions of water supply impacts are provided in Chapters 3 and 8 of the FSEIS. Impacts resulting from changes in economic viability of agriculture are discussed were applicable. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
026	Greg Nelson	9/17/15	3	What are the financial costs to all county citizens to support all the infrastructure extensions that will be required?	Per Washington Administrative Code 197-11-444, financial costs are not considered to be elements of the environment under SEPA. New infrastructure would incur additional costs. For more information, please see Section 8.3. The Capital Facilities Plan currently being drafted will address how the County will pay for the proposed changes and improvements.
026	Greg Nelson	9/17/15	4	Will we be dooming ourselves to remembering how easy and delightful it was to drive from an urban area and feel that you were out in the country?	Thank you for your comment.
026	Greg Nelson	9/17/15	5	We have professional staff people at the County who must be allowed the time and resources to be able to present this community with a realistic assessment of the benefits and costs of revising a carefully constructed growth management plan. The requirement for the 2016 update of the plan is intended to guarantee that we assess the Growth Management Plan periodically. It is not a mandate to increase the planned rate of growth for the County. If Alternate #1 is adopted the staff will be able to carefully consider future options and present them to us. It will give the citizens of the County the time and facts to help make judgements about growth management for our community.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
026	Greg Nelson	9/17/15	6	Alternate #4 seems to have been generated by a small special interest group, without input or involvement from Clark County staff. Adoption of this alternate would reward this group with an immediate financial windfall, without requiring them to dilute their profits by absorbing the enormous future costs of the new infrastructure that sub dividing rural farm land into 5 acre home sites will require. The fact that this alternate can be considered under such self-serving circumstances is a community embarrassment.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
111	Gretchen Starke	9/15/15	1	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.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
111	Gretchen Starke	9/15/15	2	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 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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
111	Gretchen Starke	9/15/15	3	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.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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111	Gretchen Starke	9/15/15	4	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
111	Gretchen Starke	9/15/15	5	<p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
111	Gretchen Starke	9/15/15	6	<p>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.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
111	Gretchen Starke	9/15/15	7	<p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
111	Gretchen Starke	9/15/15	8	<p>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.</p>	Impacts assessed at the programmatic level tend to be more general due to lack of knowledge about specifics regarding how the development would actually occur. Please see Chapter 1 for a full description of the BOCC-adopted Preferred Alternative.
111	Gretchen Starke	9/15/15	9	<p>Alternative 4 will put a strain on water resources.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
111	Gretchen Starke	9/15/15	10	<p>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.</p>	Wildfire was not explicitly addressed in this analysis because it was covered in the 2007 Comprehensive Plan Update SEIS. Fire protection is discussed in sections 8.1.1 and 8.2.1 of this Draft SEIS. A climate change analysis is not required by SEPA at this time.
111	Gretchen Starke	9/15/15	11	<p>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.</p>	The totals on page 3-13 of the DSEIS were a typographical error. Please see Chapter 3 of the FSEIS for corrected numbers.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
092	Grover Laseke	9/16/15	1	<p>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.</p> <p>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.</p> <p>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.</p>	Thank you for your comment. Additional references have been added to the analysis regarding Woodland, most specifically in Chapter 8, Public Facilities and Utilities.
073	Harry Wiebold	9/11/15	1	I've lived and worked in Clark Co. my whole life. I've watched and have been part of the growth process. To be fair to the large landowners Alternate 4 is the only way to go. I've worked with tree farmers my whole life. They are true stewards of the land, true environmentalists that strive to protect and get the most out of the land. They have never been treated fair for there hard work. The county and state always have one hurdle after another for the tree farmers, but they struggle and remain strong. Most of them will not split there places, but they need options. Life doesn't always work out as planned and emergencies come up. Death, sickness, loss of income all can happen real quick. We need to have the option to sell off a piece of land to survive or for our kids to be able to have a country life.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
073	Harry Wiebold	9/11/15	2	As far as infrastructure, the building permits and impact fees are suppose to support growth. also tax revenue goes up on small parcels compared to open space or timberland revenue. We need new schools in north co. The only way you can fund them is to cell some rural lots and build houses and the funded will come from increased revenue.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
073	Harry Wiebold	9/11/15	3	Alternate 4 may need some adjusting ,but is needed to keep young families futures healthy. The people that live in town and are opposed can go buy a big piece of ground and preserve it. that's there right, just like splitting off a small parcel of our big parcels should be our right. City folks should not control country folks.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
073	Harry Wiebold	9/11/15	4	I hope extra time can be given to work this plan out to where it benefits everyone. It shouldn't be rushed because it effects the next 20 years.	The County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension.
073	Harry Wiebold	9/11/15	5	Please consider giving the large owners some options and rights for all there hard work.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
014	Heather Tischbein	9/15/15	1	<p>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:</p> <p>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.</p> <p>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 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.</p>	The County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016. The Preferred Alternative, described in Chapter 1 of the FSEIS, was approved by the BOCC in February 2016, after the new council members took office. The intent of the SEPA process (in this case a supplemental EIS) is to document in a general sense what the potential environmental impacts might be from the various alternatives. The DSEIS is used to inform the selection of a Preferred Alternative, and the Capital Facilities Plan (CFP) is developed based on the Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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014	Heather Tischbein	9/15/15	2	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.	It is true that the No Action alternative does not actually mean that nothing would occur. The No Action Alternative can, for the purposes of this project, be considered the "No Change" alternative in that it would maintain the exiting 2007 Comprehensive Plan as it is currently updated. Although there would be no change in the current urban growth boundaries, policies, or implementation ordinances, the growth would still occur in accordance with the current boundaries, policies, and ordinances. Due to the fact that the actual growth rate was slower than the growth rate predicted in 2007, there is still room for growth under the 2007 comprehensive plan and it is considered to be a viable alternative. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
014	Heather Tischbein	9/15/15	3	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 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.	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
014	Heather Tischbein	9/15/15	4	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.	The County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
185	Heather Tischbein	8/25/15	1	<p>I have a question/concern re section 8, Public Facilities and Utilities that I would like entered into the public record.</p> <p>Section 8.3.1 states that public service and utility providers were contacted for information on how the alternatives being considered would impact their services, but the DSEIS doesn't present details on cost and revenue projections nor analysis or interpretation of the information received, other than the oft-repeated and self-evident summary statement that Alternative Four would have the highest potential for impacts due to the most potential for intensive development.</p> <p>The statement in section 8.3.3 on page 8-10 hints at impacts to taxpayers and ratepayers: "Unavoidable adverse impacts would result only if the revenue was not available to expand public facilities and utilities to the required levels of service." The "only if" caveat is big here, given all the variables involved in securing "revenue".</p> <p>I am assuming that these very important practical details re costs and revenues are addressed in the Capital Facilities Plan, since they aren't addressed in the DSIES. Is this a correct assumption?</p> <p>When do actual costs and revenue projections, the potential financial implications to taxpayer and ratepayers associated with these alternatives, become available to the public for their consideration and input to the council?</p> <p>I'm having a hard time understanding how a citizen is to think wisely about these choices w/o better facts about financial implications. We all know that more development means more infrastructure costs, even in a mandated "phased development" scenario as suggested by the DSEIS as a possible mitigation measure. As a taxpayer and ratepayer who is going to have to ante up to fund these projects, I would appreciate knowing some real numbers associated with these alternatives.</p> <p>When does a Capital Facilities Plan become part of this public deliberation?</p>	<p>Costs and revenues are an important component of the comprehensive planning process, and the Capital Facilities Plan (CFP) is a GMA requirement and will be part of the public deliberation.</p> <p>The intent of the SEPA process (in this case a supplemental EIS) is to document in a general sense what the potential environmental impacts might be from the various alternatives. We have some idea what the costs could be for Alternative 1, because a CFP was prepared in 2007 to cover the planning horizon out to 2024.</p>
072	Herb Maxey	9/17/15	1	I have lived in the Hockinson area for almost 30 yrs. It was a pleasant rural area, It has sense grown into a Vancouver suburb with associated traffic and pollution issues.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
072	Herb Maxey	9/17/15	2	I support plan 1 with plan 3 being a growth alternative,	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
072	Herb Maxey	9/17/15	3	2 and especially 4 create traffic issues that the county can not counter.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
072	Herb Maxey	9/17/15	4	The additional septic systems puts pressure on the eco system that cannot be mitigated.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
072	Herb Maxey	9/17/15	5	In regards to property rights, those who bought large pieces of property to develop after code changes are implemented should not have the right to change our rural community. Land pieces that have been in families for over 50 yrs should have the right to sub divide with conditions.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
205	Jacqueline & Joseph Freeman	9/8/15	1	<p>We have owned our farm in Battle Ground since 2002. Originally it was a family farm and we have been able to continue to work the land in sustainable agriculture.</p> <p>Many people ask us what we grow, and they do that with the expectation that we're going to give them one iswer -- like "apples" or "corn" or "sheep," but our answer is different. We are a family farm that is formed with the understanding that a farm works best when it has DIVERSITY. The entire system works to support itself with plenty of overlap of resources within the farm.</p> <p>We have a ten acre farm and we lease eight more acres nearby for livestock pasture. On our land we have dairy and beef cows, dairy goats, broiler chickens, laying hens, seasonal turkeys and many honeybees. We grow orchard fruit -- apples, pears, peaches, plums, grapes, goumi, seaberries, thornless blackberries, currants, melons and cantaloupe, yellow and red raspberries. We raise squash, peppers, cucumbers, salad greens, beets, potatoes, carrots, broccoli, cauliflower and 44 varieties of tomatoes. We also grow a wide variety of herbs and flowers, and always try a few interesting things (this year we are growing peanuts!) to see how far we can expand our farm.</p> <p>We have plenty of fruit shrubs and flowering bushes to provide forage for our very healthy honeybees. This last is a challenge for many beekeepers in Clark County who often rely on nature to feed the bees. We are proactive and plant heavily in the summer and fall so our bees have food when the season goes dry.</p> <p>We make our own compost from animal manures and vegetation we cull from the land. We use this finished product to enrich the gardens and animal pastures. These days many people don't understand the value of composted manure and choose instead to use chemical fertilizers which leach into our local water with dire effects. Compost is more natural way which makes the soil stronger and the fruits and vegetables more resistant to pests and diseases.</p> <p>Our system is successful and we have a bounty. We sell our food in Clark County and donate surplus to the food Bank. Our system works because we have enough land to access each crop or livestock's unique aspects. The cows and goats provide milk, cheese and beef, and we feed the surplus to our chickens for extra protein.</p> <p>The goats are voracious browsers who keep the blackberries down. The cows and all our livestock donate tons of manure that is the primary ingredient in our soil enriching compost. Even apple trees are multi-faceted: they provide fruit, cider, shelter and food for our turkeys who in turn keep the trees free of bugs. Even damaged fruit gets re-purposed to livestock treats and then into compost piles.</p> <p>With a small piece of land, we would not be able to engage each of these farm components to their maximum use. Animals take up a lot of space, especially when we rotate them through different pastures using principles of sound pasture management. The animals are a very important part of making sure we have nutrient dense soil for the food that we grow, which makes it healthier than conventional or imported food. If larger parcels are broken down into smaller pieces, you won't find many people raising animals, yet animals are important to the health of the soil. Without animals on the land, the only choices are to supplement the everweakening soils with imported fertilizers and to put the water supply at risk.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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205	Jacqueline & Joseph Freeman	9/8/15	2	<p>We also want to point out something that needs to be at the front of your minds as you make these choices about which plan to follow. As part of the ancient Willamette Valley floodplain, the lands that are here are some of the richest and best growing soils in the world. Every time some of this soil is turned into residential or commercial areas, that incredible soil is lost to agriculture forever.</p> <p>We know you aren't farmers and that it's hard for you to understand what that loss of perfect soil means, but it makes a grown farmer cry to know this land will never again grow food for anyone, man or animal. In some parts of Clark County we have topsoil that is a dozen, even twenty feet deep. This is highly unusual and a tremendous resource for Clark County and should be protected to the hilt.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
205	Jacqueline & Joseph Freeman	9/8/15	3	<p>Alternatives 4 and 2 may look like good ideas but they will have a devastating effect on local agriculture because they will break up agricultural land into parcels too small to sustain a healthy and productive food system. Please look instead to ways that will allow MORE sustainable farming in Clark County and increase our access to healthy land and healthy food.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
118	Jacqueline Lane	9/15/15	1	<p>Having reviewed the entire document, I strongly object to the inclusion of Alternative 4 as it cannot comply with the Growth Management Act. It is not fair to landowners to even go there, since it cannot pass in the long run.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
118	Jacqueline Lane	9/15/15	2	<p>Given the cost and impact of the infrastructure needed to support it, I cannot support alternative 2.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
118	Jacqueline Lane	9/15/15	3	<p>Alternative 1 - no change - would give us more time to develop a plan better suited to our community's needs while meeting the requirements of the GMA. Alternative 3 does provide some relief to the cities within the county and may be manageable in terms of infrastructure and impact.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
118	Jacqueline Lane	9/15/15	4	<p>retaining the rural character of Clark County, and supporting agricultural is important to me.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
118	Jacqueline Lane	9/15/15	5	<p>Also ensuring that we have the large plots of land needed for future industrial growth is critical and would not happen if Alternative 4 is adopted.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
118	Jacqueline Lane	9/15/15	6	<p>So in short, Alternative 1 is my preferred, with more work going into developing an update.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
118	Jacqueline Lane	9/15/15	7	<p>Alternative 3 would be my second choice. I cannot see how 2 or 4 would benefit the county or be sustainable.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
118	Jacqueline Lane	9/15/15	8	<p>Wells are already being impacted, roads and other infrastructure are already a challenge. those are not well addressed in 2 or 4.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
127	James Howsley	9/1/15	1	<p>Clark County needs to reset this process. The Draft EIS continues to ignore concerns expressed in my earlier letters. This GMA process continues to rely on plainly false assumptions regarding the population growth rate through 2035. VVe request that the Board consider asking for an extension from the state legislature in 2016 to get the planning assumptions in line with the present realities. The background is that OFM and the county take the reduced growth rates of the recent recession and project them forward 20 years. But the recession was an aberration and in the last couple years the growth rate has returned to normal. As noted by the Brookings Institution, the recession years were an anomaly, and now popular metropolitan areas are returning to faster growth rates, especially our own. And of course for a 20 year plan, the data from a limited aberrant period cannot be expected to continue in the long term.</p> <p>The 2012 OFM report, which is based on a November 2011 forecast, notes the reduced migration of the recession, and remarkably states: "[n]o attempt is made to predict the timing and magnitude of any significant migration rebound." In other words, the data the county relies on presumes there will not be an economic recovery after 2011. But now the data through 2014 is in, which shows the in-migration is rebounding, and the annual overall growth rate is up to 1.67%. Obviously the 2012 report erred. Of course the erroneous population assumption drives the erroneous conclusions about land needed and related long range planning metrics.</p>	<p>The County's planning assumptions were vetted and adopted prior to the development of alternatives. The County considers these assumptions to be an accurate representation of how it will grow over the next 20 years. The County is obligated by law to update its comprehensive plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension.</p> <p>The planning assumptions were originally drafted in 2007, before the recession began; therefore, it was determined that the growth projected before the recession was likely in line with the growth projections now that the economy has rebounded.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
127	James Howsley	9/1/15	2	Remember that our county has an influx of young adults for whom we will need surplus land for housing as they transition from apartments to houses. Young adults also drive the need for parks, employment and educational lands, as their children enter school and the parents settle into their careers. Our metro area is third highest in the entire country for immigration of young adults aged 25-34. This data is consistent with OFM's 2013 Population Trends data which shows the percentage of senior citizens in Clark County is below the state average.	Thank you for your comment. It will be reviewed and considered during the development of the Final SEIS.
127	James Howsley	9/1/15	3	<p>Instead of trudging forward with bad data that will lead us to messy litigation, the county should pause to reconsider the assumptions the Draft EIS is built upon. The OFM County Growth Management Study provides that "[i]f the county shows population dynamics that would invalidate the GMA projections before the next set of GMA projections is performed, the county may petition OFM to make changes to their forecast." The County should ask OFM to do just that.</p> <p>Reset Request</p> <p>The County Board is on the cusp of an historic change, and will grow from 3 to 5 members in January, 2016. The current Board should not proceed with the controversial GMA update before the new commission takes office. We recognize that time is short, and suggest a postponement of further action on the GMA Update. The Board could go to the 2016 legislature for approval of a delay to allow the new board to learn about the update, and to allow OFM to revise the erroneous population numbers. The alternative is years of litigation which certainly will be slower and more expensive in the long run and may lead to a similar result.</p> <p>This remains a problem that all of us need to work together to solve to make room for the next generation of families, and I look forward to working with you for that purpose.</p>	The County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016.
033	James Irish	9/3/15	1	The City of La Center supports Alternative 3 because it will help us create local jobs at the 1-5 Junction and because it will assist the La Center School District in building a new elementary school. Alternatives 1, 2 and 4 do not directly help La Center create new jobs and they alone will not prevent the City from falling short of the county-wide jobs to housing balance	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
033	James Irish	9/3/15	2	<p>The DSEIS contains several mapping errors relating to La Center:</p> <ul style="list-style-type: none"> o All of the jurisdiction maps within the draft SEIS use the La Center city limit boundaries for 2012 not 2015. Since the base map is wrong it should easy to fix the problem. o Figure 1-3a, Alternative 3 Comprehensive Plan and Zoning for UGA Expansion, the color on the La Center maps for the proposed 17-acre School District expansion is shown as Commercial rather than Public Facilities. 	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative, including updated figures.
033	James Irish	9/3/15	3	Table 6-4, Land Use Designation Change by Area, states that La Center experienced a 500 acre change in its UGA due to a mapping 'discrepancy' relating to a changed water designation. We watched our UGA shrink significantly after 2007 because of a later court decision and because of a large annexation but are not aware of the water designation error.	The mapping discrepancies were internal to the County's GIS database. Please see Chapters 1 and 6 of the FSEIS for updated information on changes to land use designations and zoning.
033	James Irish	9/3/15	4	Financial Burden. The draft DSEIS does not take a serious look at the financial cost of each alternative, particular infrastructure costs. The SEIS would be much stronger and would provide a better foundation for selecting a preferred alternative if it included at least a generalized comparison of costs per alternative. Alternative 1 provides a starting point by using existing city/county CFPs. The DSEIS acknowledges. Alternative 4 will produce more significant costs but unfortunately provides no insight into what those costs might be. For example, the DSEIS does not discuss in meaningful detail how any jurisdiction might respond to increased local transportation costs relating to the 120,000+ average daily trips 12,400 new homes in the rural area will generate.	Per Washington Administrative Code 197-11-444, financial costs are not considered to be elements of the environment under SEPA. At this programmatic level, discussion of the relative costs associated with the Preferred Alternative has been provided where prudent, such as in Section 8.3, to assist supply decision makers with a general understanding of the likely of the Preferred Alternative resulting in additional costs.
033	James Irish	9/3/15	5	Groundwater. The ground water section (3.2), states that little has changed since 2007. How do we know that rural groundwater reserves are the same today? The DSEIS states that 95% of all potable water in Clark County comes from groundwater. If Alternative 4 will add 12,400 new homes outside of the UGAs where will that water come from, CPU and wells? The SEIS should examine the rural area's capacity for future ground water extraction. Given the anecdotal evidence that North County private wells are pumping deeper, Alternative 4 must consider groundwater extraction more thoroughly.	Additional information on water supplies has been added to Chapters 3 and 8 of the FSEIS.
033	James Irish	9/3/15	6	Septic. Figure 2-3, page 2-6, illustrates clearly most county soils have "Very Limited" potential to accommodate septic systems. The ground water discussion says that there is a higher chance of groundwater contamination when you increase rural housing. This contamination could reasonably come from 12,400 new septic systems. The SEIS should take a deeper look at ground water sources, long term capacity and should measure that baseline against the greater risk of groundwater contamination that Alternative 4 will create.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
033	James Irish	9/3/15	7	Soils. Section 2.1.1, page 2-2, states there has been little change in soil conditions since 2007. Figure 2-1, Soils Capabilities for agricultural use, depicts soils ranging from 'prime' to 'not prime'. Is this the same soil map that was used for the 2007? The SEIS should clearly state the source of evidence supporting this claim.	Thank you for your comment. The most recent available data was used to create Figure 2-1: the 2009 USDA SURRGO dataset. This source has been added to the figure, and the text has been revised to increase clarity. In Section 2.1.1 it now states the following: in general, there has been no change to the soil or geologic conditions of the county since 2007. New soil data since 2007 does not change the general understanding of the soil conditions or surface geology in the county.
033	James Irish	9/3/15	8	Transportation. The transportation chapter does not provide any measurable data which might assist a city as it tries to calculate what the transportation impacts from rural development will be under Alternatives 2 or 4. It is not enough to say that Alternative 4 has the "highest potential for impacts". This is a common sense statement but is not supported by evidence and analysis. The cities need better information about how the creation of 12,400 new parcels will directly affect their local infrastructure. In our area, all County roads lead into and through La Center.	Additional information and analysis of transportation effects has been added to Chapter 7 of the FSEIS.
130	James Winkler	9/8/15	1	I am the managing member of HHF, LLC that owns tax parcel 21 5 i39-002, which is a 43 .1 4 acre parcel immediately south of the existing urban growth area on the east side of the City of Ridgefield. The property is currently zoned AG-20 and located on the south side of 259th Street at 1613 NE 259th Street. We object to Alternatives 2 and 4 to the extent that those alternatives would rezone our property and the surrounding property to AG-10. We believe larger parcel sizes are necessary near the urban growth boundary to preserve future development options once the area is urbanized. We therefore request that our property and the surrounding property retain its AG-20 zoning.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. You may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
076	Jan Verrinder	9/17/15	1	Yes on Alt 1.No on 2 and 4.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
076	Jan Verrinder	9/17/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
076	Jan Verrinder	9/17/15	3	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.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. You may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
076	Jan Verrinder	9/17/15	4	What shouldn't involve risk is planning at the county level for basic county needs.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
131	Janice Zastoupil	9/16/15	1	I vote for little or no change to our comprehensive plan at this time.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
095	Janine Hook	9/15/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
095	Janine Hook	9/15/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
095	Janine Hook	9/15/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
095	Janine Hook	9/15/15	4	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.	Per Washington Administrative Code 197-11-444, financial costs are not considered to be elements of the environment under SEPA. At this programmatic level, suffice it to say that additional infrastructure would incur additional costs and alternatives that promote growth that is more spread out would result in more new infrastructure than development that utilizes the utility infrastructure presently available. For more information, please see Section 8.3.
060	Janine Lamberg	9/6/15	1	I urge you to adopt alternative 4 and return private property rights to the rural land owners who own and are paying taxes on that land. I have 3 adult children who would like to buy acreage in the country to raise their children along with the space needed to have some cows, chickens etc., but there is a real shortage of land available here in the Battle Ground area.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
068	Janine Lamberg	9/10/15	1	I urge you to support alternative 4 that was proposed by CCCU and restore some of the property rights that have been taken from the rural landowners.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
068	Janine Lamberg	9/10/15	2	This is also a request to have my property, parcel# 223272-000 included in the 2.5 acre zoning so that my daughter and her family can have a house in the country to raise cows and chickens There is a real shortage of rural land for sale and I want to have the right to sell my children a parcel to build a home on. Also, I request that you include parcel# 224507-000 which borders the proposed 2.5 acre re-zoned area. I am in the process of buying this land with the intention of dividing it into parcels that my children and grand children can have a parcel to build a home on in the future. It is currently in Ag. and I plan to continue that . My family wants to be able to raise animals and they need acreage to do that.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. You may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
124	Jed & Kelly Lamberg	9/17/15	1	I urge you to adopt alternative 4 and return private property rights to the rural land owners who own and are paying taxes on that land. There is a real shortage of land available here in the Clark county area. We have 4 children and they will want to find a place of their own in Clark county out in the country . It's such a good way of life to have a garden, few animals and to be able to raise & grow your own food for our family. We would like to have the right to be able to divide our property so our children could live close by. This shortage has come about as a result of the overly restrictive growth plan that was previously adopted . As Americans we should have the right to choose.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
107	Jeff Hodges	9/17/15	1	I would like to express my most passionate support of alternative 4. It is the best alternative for all of those with small acreages.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
107	Jeff Hodges	9/17/15	2	Trying to farm with the ever rising costs of materials, land, equipment, feed, veterinary ...	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
080	Jeff Niten	9/15/15	1	Thank you for the opportunity to provide Ridgefield's comments on the Draft Supplemental Environmental Impact Statement. I appreciate the opportunity to coordinate with Clark County. The City of Ridgefield supports Alternative 3 because it will allow an expansion of our current Urban Growth Boundary to satisfy the residential demand.	Thank you for your comment. The County appreciates the City of Ridgefield's involvement in the Comprehensive Master Plan Update and SEIS processes.
080	Jeff Niten	9/15/15	2	Alternatives 1, 2 and 4 do not directly help Ridgefield support urban residential demand and, in the case of Alternative 1, has similar impacts according to the DSEIS.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
080	Jeff Niten	9/15/15	3	The DSEIS contains an error relating to Ridgefield: The Ridgefield expansion area as part of Alternative 3 was evaluated as a mix of low, medium and mixed use zoning. That zoning mix was not part of the City's request and could skew the analysis of the expansion area.	As no designation other than residential was proposed, the County assumed a mix of housing types to represent a likely scenario for development within this area. The impacts associated with this development represent a likely worst-case scenario, as is appropriate for a programmatic SEPA analysis.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
080	Jeff Niten	9/15/15	4	The DSEIS does not substantially review the financial cost of each alternative, particularly infrastructure costs. The DSEIS would be much stronger and would provide a better foundation for selecting a preferred alternative if it included at least a generalized comparison of costs per alternative. Alternative 1 provides a starting point by using existing city/county Capital Facilities Plans. The DSEIS acknowledges Alternative 4 will produce more significant costs but provides no insight into what those costs might be. For example, the DSEIS does not discuss in any detail how any jurisdiction might respond to increased local transportation costs relating to the 120,000+ average daily trips 12,401 new homes in the rural area will generate.	Per Washington Administrative Code 197-11-444, financial costs are not considered to be elements of the environment under SEPA. For certain projects, cost is one of the alternatives evaluation criteria posed in the purpose and need. However, that is not the case for this project, and therefore the cost of each alternative has not been calculated. At this programmatic level, suffice it to say that additional infrastructure would incur additional costs and alternatives that promote growth that is more spread out would result in more new infrastructure than development that utilizes the utility infrastructure presently available. For more information, please see Section 8.3.
080	Jeff Niten	9/15/15	5	The ground water section (3.2), states that little has changed since 2007. How do we know that rural groundwater reserves are the same today? The DSEIS states that 95% of all potable water in Clark County comes from groundwater. If Alternative 4 will add 12,401 new homes outside of the UGAs where will that water come from? The SEIS should examine the rural area's capacity for future ground water extraction. Alternatives 2 and 4 must consider groundwater extraction more thoroughly. Septic. Figure 2-3, page 2-6, illustrates clearly most county soils have "Very Limited" potential to accommodate septic systems. The ground water discussion says that there is a higher chance of groundwater contamination when you increase rural housing. This contamination could reasonably come from 12,401 new septic systems. The SEIS should take a deeper look at ground water sources, long term capacity and should measure that baseline against the greater risk of groundwater contamination that Alternative 4 will create.	Additional information on water supplies has been added to Chapters 3 and 8 of the FSEIS.
080	Jeff Niten	9/15/15	6	Transportation. The transportation chapter does not provide any measurable data which might assist a city as it tries to calculate what the transportation impacts from rural development will be under Alternatives 2 or 4. It is not enough to say that Alternative 4 has the "highest potential for impacts". This is a common sense statement but is not supported by evidence and analysis. The cities need better information about how the creation of 12,401 new parcels will directly affect their local infrastructure.	Additional information on transportation has been added to Chapter 7 and Appendix E of the FSEIS. Individual projects would be required to undergo separate environmental analysis under SEPA, and it is at that time that additional, project-level traffic analysis would be conducted.
080	Jeff Niten	9/15/15	7	Finally, I would like to make it clear that the City of Ridgefield is concerned that the adoption of Alternative 4 would hamper future economic growth opportunities by allowing the division of large parcels immediately outside our corporate boundary. Large employers would be forced to look elsewhere for parcels large enough to accommodate their investment during siting decisions. At a minimum we would request a detailed economic analysis of the impacts to cities resulting from the fragmentation of parcels outside of Urban Growth Areas.	Per Washington Administrative Code 197-11-444, economic impacts are not considered to be elements of the environment under SEPA. Under SEPA, the public has the opportunity to ask for additional analysis; however, it is up to the Lead Agency as to whether or not they choose to conduct it.
080	Jeff Niten	9/15/15	8	Thank you for the opportunity to comment on the DSEIS. I look forward to working collaboratively with the Board of Councilors and Community Planning during the Comprehensive Growth Management Plan development process.	The County appreciates the City of Ridgefield's involvement in the Comprehensive Plan Update and SEIS processes.
085	Jennifer Kuoppala	9/8/15	1	I want to take a minute to strongly request that the Alternative 4 growth plan option be implemented.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
085	Jennifer Kuoppala	9/8/15	2	I grew up in Battle Ground and have recently moved back to the area, from Southern British Columbia where I was living for 5 years. Never before have I heard of so many peers of mine having difficulty finding housing, whether it be rental or ownership. Due to the gridlock of not enough land available for purchase, many families are having to double up or live with parents and in-laws while searching for housing. Something has to change and I feel that Alternative 4 is the wisest choice to alleviate this problem. Many people that I talk to are moving away from this area due to the lack of available property to raise their families. Some are moving to the area and running into this problem and deciding to move elsewhere in Washington. In order to serve the growing Portland/Vancouver metropolitan area that is currently drawing relocates here with work, there needs to be available property to house them and their families. Not everyone wants to live in a highrise- my family included. We will need to move elsewhere if property is not available to purchase here.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
084	Jerry Olson	9/17/15	1	The EIS does not adequately analyze the impacts of the gross underestimation of the population projection, and what that result would be to the community and the environment.	The population projection was provided to the SEIS planning team as part of the County Council's confirmed planning assumptions. In the event that these planning assumptions are considered to be invalid, a new EIS process would be triggered.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
084	Jerry Olson	9/17/15	2	The EIS does not adequately address the impacts of assuming that over half of the critical land in the Urban Growth Boundary will be built on to full density. What are the alternatives to avoid or minimize that occurrence?	Discussion of impacts to critical areas is provided in Chapters 3, 4, and 6 of the FSEIS. Compliance with project-specific SEPA conditions, if applicable, would mitigate potential impacts from individual development proposals. Proposals would also be required to comply with existing excavation, grading and building permits, as well as critical areas ordinances and other development codes.
084	Jerry Olson	9/17/15	3	The EIS does not acknowledge the addition of biodiversity habitat lands in the Urban Growth Boundary that would reduce the amount of buildable vacant land as shown on the buildable lands model, or the result of building on over half of it.	A comprehensive review of the Vacant Buildable Lands Model (VBLM) criteria and assumptions was undertaken in 2006. One of the changes made in the current update was to change from applying assumptions to parcels based on percentage of critical land to simply identifying constrained and non-constrained land by parcel and applying higher deductions to constrained lands, making the calculations for underutilized lands more dynamic. Constrained lands include, among other things, habitat areas with a 100-foot buffer, species areas with a 300-foot buffer, and fish bearing riparian streams with a 200-foot buffer.
084	Jerry Olson	9/17/15	4	The infrastructure assumption does not allow for adequate storm water set aside to treat water pollution.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
084	Jerry Olson	9/17/15	5	I support Alternative 4 in the plan over the other choices, but it does not add enough land to the Urban Growth Boundaries to satisfy GMA.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
123	Jim and Camee Hoffman	9/10/15	1	I am emailing about the Joint Board of County Councilors and Planning Commission hearing regarding the Comprehensive Plan Draft Supplemental EIS. It was our full intention to be at the hearing on Sept. 10. However, Amboy School is having its Open House at the same time. Our children must come first, both in the future, and more importantly in the present... therefore, we will not be at the hearing ... However, we would like to give our wholehearted support of Alternative 4 for your consideration.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
093	Jim and Linda Nielsen	9/8/15	1	Please consider this a formal request to change the zoning on parcel #198098000 and #198090000 to a C-3 zone as part of the comp plan update. The address of the house is 12508 NE 117th Avenue and the Property is in the name of Nielsen Family Properties LLC and Nielsen Harry and Nielsen Mary trustee.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. You may apply to Clark County for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
088	Jim Byrne	9/13/15	1	Please support Alternative 1 for the new growth management plan. I live in the rural area of the County outside Ridgefield. I believe Alt 1 provides the best quality of rural life. The numbers developed in the original plan will accommodate realistic projected rural growth. I do not want the creation of many additional building lots within the rural area. Please support Alternative 1.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
122	Jim Klinger and Debbie Roth	9/7/15	1	We have 30 acres in Ridgefield that we would be very interested in sub dividing into a min of 10 acre parcels if not 5 acre parcels. Our address is 4604 NW 289 st Ridgefield Wa 98642. So what I'm saying if this counts as a vote count us in as I won't be able to attend the Thursday Sept 10 meeting.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
032	John Jessup	8/13/15	1	For the last 26 years I have lived and owned my dream home in north Clark county. It has been the best time of my life and I am proud of what we have done here for ourselves but more important, for the land and animals that called this their home long before man was here. We have turned this into a certified green timber tree farm and I have loved watching our "baby" trees grow over the years. We had neighbors of eagles, deer, elk, bear, porcupine, raccoons, coyotes, birds of numerous kinds and all the wonderful surrounding a lover of nature would ever want. We used to be completely surrounded by woods on every side and enjoyed the soothing and wonderful sound of our year round creek to calm us like nothing else could.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
032	John Jessup	8/13/15	2	<p>Our barn was built in 1909 and the house in 1910. I have kept it like it was and taken great pride in continuing the esthetics of the past. U have installed, without any help from the government of PUD a 60kw wind generator and after purchasing the land, installed a geothermal heat pump. That tells you the kind of people my wife and I are.</p> <p>Through the years as the county has grown, it is simply disappointing to realize the direction government has taken. The individuals who wish to uphold the things that the past has given us and being out weighed by special interest and the value of power and money. To let someone enjoy the love of their existence is becoming harder and harder to realize due to the expansion of greed and ignorance to individual right of the pursuit of happiness. Water resources and the simple fact that this all used to be forested country is not in the formula at all with the management we have today. Shame on all of you. You care about self interest and are following the one's with money and power. The fact that many people live in the country because we simply love it doesn't matter, the decisions you enact are slowly taking that from us. My only recourse is writing this email and voting.</p> <p>I feel I speak for all the generations that have lived here before me and I my doubts that there will be any future generations that can even imagine this peace and tranquility we enjoyed though the years. It is slowly being taken away through thoughtless and careless rules that let progress (as you see it) destroy a way of life that will soon be no longer. I can't help but think of the constitution and it saying something about the pursuit of happiness</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
032	John Jessup	8/13/15	3	<p>I would hope that somewhere in your heart you would have room for people in the "boonies" that enjoy nature and try to be good stewards of the land and animals. Don't let developers overrun us into oblivion just so they can fatten their bank accounts. We are part of this society and soon when the water runs out in our wells, we will hold your decisions as the root cause. Please take time to consider the generations of people before us that came here for what it is, a sincerely beautiful and peaceful place full of nature's wonders and the beautiful animals that have lived here for thousands of years.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
087	John Matson	9/15/15	1	<p>The Growth Management Plans has many flaws most who support the GMP say we need to save water, farm land and prevent urban sprawl, but many of what they say do not prove factual.</p> <p>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, as 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 GM boundary is moved they can divide into small lots and 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 ½ - 5, but move the GM boundary and they can put up to 12 units per A. or more.</p> <p>Pretty unfair</p> <p>If rural land owners could break land into small lots of 1-2 ½ -5 A estates it would be to 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 and friends.</p> <p>How do we pollute less and use less water living in urban th rural and if you drive around the County there are many bigger pieces of land producing lot of weeds, junk brush, and blackberry (weed) so 1-2 ½-5 A. could produce so much more.</p> <p>I have a little garden, 30'x 45' and produce way more than family just on the 30'-45' use so give a lot away and with a little more effort could double it. So lets be fair to help improve and protect our neighbors property and living and not regulate beyond reason and common sense!</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
087	John Matson	9/15/15	2	<p>If consider everyone, only one plan done that. Support plan #4 which will even help the urban people more.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
090	Jude Wait	9/17/15	1	<p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
090	Jude Wait	9/17/15	2	<p>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.</p>	The discussion of cumulative impacts is incorporated throughout the document. An overarching cumulative impacts discussion was not used for this programmatic SEIS due to the high-level nature of this analysis.
090	Jude Wait	9/17/15	3	<p>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?</p>	This comment-response report is intended to document that your comments have been reviewed and considered. The County maintains the discretion to incorporate the information and suggestions it receives as it deems appropriate.
090	Jude Wait	9/17/15	4	<p>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, 11 238,897 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.</p>	The numbers referred to in Chapter 3 of the DSEIS were a typographical error. Please see Chapter 3 of the FSEIS for updated and corrected information.
090	Jude Wait	9/17/15	5	<p>Cumulative impacts seem assured, in part because there are few regulations in place, and hardly any incentives for smarter development or biodiversity.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
090	Jude Wait	9/17/15	6	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."	The statement that you quoted came from Chapter 5, Energy and Natural Resources, and it does not apply to water resources. As stated in Section 3.4 in the DSIES, development projects that propose to impact water resources are regulated by local critical areas codes and state regulations governing water quality. These regulations require impacts to be avoided and minimized, and unavoidable impacts require compensatory mitigation. In addition, they help ensure no net loss of ecological functions on an individual project scale. Some small level of impact may still occur with each new development; however, mitigation is typically required. To view potential water resource mitigation methods, see Section 3.5.
090	Jude Wait	9/17/15	7	In brief, the only alternative to focus on is Alternative 1.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
090	Jude Wait	9/17/15	8	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.	It is not within the scope of the environmental permitting process to retroactively impose mitigation measures. However, as development occurs in Clark County, it may be determined that certain actions, when coupled with current actions, would create a significant cumulative impact that warrants additional mitigation. Such a determination would be made on a project-by-project basis.
082	Judy Zeider	9/17/15	1	I urge you to reject Alternative 4	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
082	Judy Zeider	9/17/15	2	adopt instead Alternative 1 and perhaps some elements of the Alternative 3 proposed by the small cities.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
082	Judy Zeider	9/17/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
082	Judy Zeider	9/17/15	4	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	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
082	Judy Zeider	9/17/15	5	overburden already strained public service.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
082	Judy Zeider	9/17/15	6	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
082	Judy Zeider	9/17/15	7	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
082	Judy Zeider	9/17/15	8	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
089	Julie Syverson	9/10/15	1	Dear Councilors, I want to show my support for Alternative 4.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
113	Karen Wood	9/11/15	1	In my previous comments on the 2016 Comprehensive Plan, I have expressed my concerns about Alternative 2 and Alternative 4. Now that more detail has been provided in the Draft SEIS, I am even more concerned about the proposed reduction of minimum lot sizes in rural, agriculture, and forest zones, which will result in more subdivision of parcels outside of the urban growth areas.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
113	Karen Wood	9/11/15	2	With over 7,000 new rural lots in Alternative 1-No Action, there is already ample opportunity for development outside urban growth areas. I see no need for the additional lots proposed in Alternative 2 and 4, nor do I see anything in the Draft SEIS that explains why this is necessary. The planning assumptions in the Draft SEIS, such as 90% of new population growth in urban areas and 10% in rural areas and the number of new dwelling units, and the principles and values adopted by the Board of County Councilors do not support the increase in rural area development. I have also not heard any reason other than "we want to be able to sell some of our property" in comments by others who support Alternative 2 and 4.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
113	Karen Wood	9/11/15	3	I understand the desire of some of the County Councilors to be responsive to those who think they are not being allowed to do what they want to with their land. But at what cost to most Clark County residents in higher taxes or reduced services, environmental impacts, and quality of life? As stated in the Draft SEIS, the infrastructure cost for transportation could be prohibitive. Costs to utilities, cities, and school districts to provide service to the surrounding rural development will also increase.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
113	Karen Wood	9/11/15	4	I'm concerned about the impact on water quantity and -uality of more rural wells and septic tanks, and more impervious surfaces (roads, driveways, etc.).	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
113	Karen Wood	9/11/15	5	There also will be significant impacts to resources that are required to be protected, such as agricultural land, fish and wildlife, and other natural resources if the lot size reductions in Alternative 2 and 4 are approved. Clark County has made a lot of progress in how land is developed in the past twenty years, resulting in reduced costs and impacts, and I do not want to see that progress reversed by allowing more development on rural lands outside of the urban growth areas.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
113	Karen Wood	9/11/15	6	Some argue that because others nearby were able to subdivide their property prior to the Growth Management Act they should be allowed to do the same. But the Growth Management Act was passed to stop exactly that type of expensive development outside of cities and the resulting sprawl and parcelization of rural and resource lands. Allowing smaller lot sizes as proposed in Alternative 2 and 4 does not meet the goals or requirements of the Growth Management Act.	Thank you for your comment. As stated in Chapter 1 of the Draft SEIS, "Clark County's Comprehensive Growth Management Plan must...meet the requirements of the Growth Management Act (GMA)." The County will not select a preferred alternative that it believes is inconsistent with the GMA.
113	Karen Wood	9/11/15	7	Tables showing new parcels/acreage affected are helpful in understanding the impact of the alternatives but they need to be cleaned up so the "potential acreage affected" totals are calculated and displayed correctly (Table 3-2 and 3-4 for example).	The numbers referred to in Chapter 3 of the DSEIS were a typographical error. Please see Chapter 3 of the FSEIS for updated and corrected information.
113	Karen Wood	9/11/15	8	I strongly support Alternative 1 since there is no need to increase the number of lots available to develop in Clark County based on the current population and job projections.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
113	Karen Wood	9/11/15	9	I accept that some of the changes in Alternative 2 to city urban growth areas and in Alternative 3 that were requested by the cities may be necessary, assuming those changes can truly be justified and are not on resource lands of long-term commercial significance, such as prime soils. I strongly disagree with the proposals in Alternative 2 and Alternative 4 to reduce minimum lot sizes .	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
119	Karl & Mary Kuoppala	9/8/15	1	We would like to voice our support for Clark County Alternative plan #4. As we are a young family with children, we feel the need and see the benefits of having affordable land available for purchase in Clark County.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
105	Kathleen and Alfred Hudziak	9/17/15	1	My husband and I would like to submit our strong opposition to Alternative 4, and opposition to Alternatives 2 and 3.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
105	Kathleen and Alfred Hudziak	9/17/15	2	We favor Alternative 1 because it allows for agricultural use of the land and does not change the character of that area of the county. It also maintains the quality of life of the people already living there, who purchased with a specific zoning in mind.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
105	Kathleen and Alfred Hudziak	9/17/15	3	To change the zoning to allow the subdivisions in Alternative 4, 2, and 3 to allow more residents will: 1) require more infrastructure and the accompanying costs to citizens already living there; 2) create more problems for residents, including impacts on school, fire, sheriff, roads, and other services.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
105	Kathleen and Alfred Hudziak	9/17/15	4	Those alternatives create more traffic, longer commute times	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
105	Kathleen and Alfred Hudziak	9/17/15	5	less desirable habitat for wildlife	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
105	Kathleen and Alfred Hudziak	9/17/15	6	reduction in the quality of life.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
105	Kathleen and Alfred Hudziak	9/17/15	7	Homes should not be spread out, but rather built closer to urban communities and slowly spread outward.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
165	Kerri Altom	9/17/15	1	<p>I am writing in opposition to Alternative 4 on the grounds that it contradicts the letter and spirit of the law. The Washington State Growth Management Act asks us to budget responsibly for our growth by designating supplies of land, water and other resources reasonably matched to demand. Proper implementation of the GMA should provide for our best economic interests. Alternative 4 fails to do this.</p> <p>Government is not supposed to be picking the winners and losers in our economy in general, and specifically in this case, a responsible government decision should not skew our community's housing marketplace. In the case of Alternative 4, our county government would add too many of the wrong lands to the market, making it relatively cheap and easy to build sprawling development on our farm and forest lands when the demand for close-in, urban housing is not being met.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
165	Kerri Altom	9/17/15	2	<p>I live in Fisher's Landing, a nicely planned community on the East side of Vancouver where we benefit from the wisdom of thoughtful community planning. We see a huge increase in demand for low maintenance homes with high density here and around our city, people looking for neighborhoods near schools with walking and biking options. I know families who have spent years pre-approved for a home loan, but living in nearby apartments, because they were hunting for a home close to their jobs in Columbia Tech Center. As we continue to build our base of high tech and new economy jobs, the demand and competition for close-in housing increases.</p> <p>For families who want a big house with a yard, there is plenty of supply in Clark County. Those houses sit on the market for months. And that supply has for too long diluted the options for others who struggle to find homes with the amenities of a well-planned urban neighborhood. People of all ages and situations are eager to live in communities with sidewalks and bike paths near good schools, parks and restaurants.</p> <p>Young couples, empty nesters, and even families with kids are opting for a different lifestyle. Many don't want to spend their weekends grooming a lawn, and they don't want to spend a fortune on tools and equipment. They want to walk to a local coffee shop, catch a bus to the Farmer's Market, or bike down to and along the river. They want to get to know their neighbors while watching their kids play together at the local park. They want to spend their weekends at soccer games, on family hikes, in the mountains or on the coast. To be mindful of the way these citizens choose to live and work, and to plan for and provide this type of housing and amenities is one of the best economic development decisions we could make at for our County's future. Investing in urban villages will position us to attract new businesses to locate here, and it will encourage our own homegrown businesses to stay here.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
165	Kerri Altom	9/17/15	3	<p>But Alternative 4 undermines this economic opportunity. Even though high density neighborhoods with small village cores are the housing of future. Even though Clark County is well positioned to create these housing and business options. And even though many of our local builders are eager to start providing these types of communities, it has been too slow to happen. As long as we're supplying huge tracts of greenfield land for development by national builders, we are undermining the economic equation. The higher density housing options are a bit more complicated to plan and permit, making it hard for our small local builders to compete as long as it's faster, easier and more profitable for builders to sprawl into our agricultural lands.</p> <p>This is how opening rural lands for housing developments skews the marketplace- giving more power to the bigger players on the supply side and less power on the demand side of the economic equation. We have builders coming here from around the country, eager to gobble up our agricultural and forest lands, where they can plat out a grid of lots, build whatever floor plans they've been building for the last 10 years, and pocket some serious profits. Cheap and open rural land attracts these builders to come here and follow the plans they've executed across the rest of the country, which is greenfield development of subdivisions.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
165	Kerri Altom	9/17/15	4	These subdivisions are the opposite of what our community needs right now. They don't make financial sense: they cost more in public services; and, they increase in taxable value at a slower rate than developments that are closer into towns and services. They don't provide the quality of life that the majority of families are looking for: sprawling subdivisions demand more time in our automobiles just to run errands or shuttle kids; commute times increase; and, all this time adds up. Families are desperate to reduce this time in our cars and spend it instead with our families, cooking meals together, walking the neighborhood, visiting with friends as our kids play together in the park.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
165	Kerri Altom	9/17/15	5	Alternative 1 will best serve the financial interests of the citizens of Clark County.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
165	Kerri Altom	9/17/15	6	Looking at the economics of this decision, selecting Alternative 4 would be a case of our elected officials choosing short term personal profits for a few over the long term best financial interests of the majority in our community.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
166	Kerri Altom	9/17/15	1	<p>I am a fourth generation Clark County resident. I was born and raised in Battle Ground, where most of my family and a lifetime of friends still live. I know landowners who don't want to be told what they can and can't do with their own property. They are often the loudest voices at the barbeque, but they are definitely not the majority.</p> <p>For every person I know who demands their private property rights, I know the stories of dozens who bemoan the way sprawling development has deeply hurt them. It is not just the painful changes in scenery. It is not just the unmanageable increases in land value. It is not just the time-wasting traffic. More than any of these hits to their quality of life, our rural community is hurt by the loss of rural identity.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
166	Kerri Altom	9/17/15	2	Community identity is a tough thing to talk about. We lack the words. But it is a powerful thing. In a rural community it is a sense that the natural world is a big part of everything, and when it is diminished things are thrown off balance. When our farmers can't afford to produce food anymore, our community loses a resource. When wells run dry and gardens shrivel up, families lose self-sufficiency. And, when forests and fields are covered in asphalt and concrete, we all lose a connection to the natural world. In time, what would be the point of "Harvest Days"? Some will assert, "That's the price of progress." But it doesn't have to be. In the case of Battle Ground, planning for more high density housing near businesses and schools while retaining and protecting farm and forest lands provides an option to retain rural character while allowing for economic growth. But that pattern of development won't happen as long as we keep opening up big tracts of agricultural and forest lands to be developed into sprawling subdivisions.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
166	Kerri Altom	9/17/15	3	The voters of Washington State passed the Growth Management Act to provide guidance to our government. It dictates the terms for planning our communities' future. It asks that our local leaders control and direct our growth by identifying and protecting critical areas and natural resource lands, designating urban growth areas, preparing comprehensive plans, and implementing these comprehensive plans through capital investments and development regulations. A proper application of those dictates to Clark County would result in protecting the rural character of places like Battle Ground while investing in its economic vitality. Implementing Alternative 1 is a reasonable step in that direction, but Alternative 4 would achieve the opposite. Putting private property rights and personal profits over the best interest of the community is absolutely not a rural value that I grew up with. Folks on Wall Street may be happy to strike a deal like that, but not in my hometown. I urge the County Council to implement Alternative 1, allowing for economic growth while protecting the best assets of our communities.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
101	Kurt Wohlers	9/9/15	1	As a property owner in Clark County I would like for my opinion to be part of the record for the upcoming change in zoning boundaries. I do believe that the more than twenty year old Comprehensive Plan did cause some hardship for several property owners. Alternative Four may resolve this issue and make them whole. Alternative Four also does more harm than good. It creates far too many potential parcels of land within the county and is only good for developers and investors. Prime parcels would be picked and everyone would pay for the infrastructure needed for these few prime properties.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
101	Kurt Wohlers	9/9/15	2	Alternative Two seems to offer some of the same problems as Four and should not be considered.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
101	Kurt Wohlers	9/9/15	3	Alternative Three does offer the best solution as it allows cities to expand their boundaries to accommodate growth. It would encourage businesses to open in small towns and therefore keep local citizens spending money on products and services in their local community without having to travel to other larger towns. LaCenter would hopefully take advantage of this and allow some limited commercial zone along Pacific Highway north of town.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
101	Kurt Wohlers	9/9/15	4	If all else fails, go with Alternative One. Some folks are unhappy but no change is better than going in the wrong direction.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
101	Kurt Wohlers	9/9/15	5	MY NUMBER ONE CHOICE IS ALTERNATIVE THREE.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
035	Kyle Potter	9/17/15	1	If we are to thrive as a county growth must be managed and controlled. It is my view that Alternative 1 and 3 are the only viable options. Alternative 4 should not be considered as it will do grave environmental damage to rural Clark County. Growth should occur where there are services available for that growth. ie water, sewer, roads, etc. Alternative 4 would create the possibility for too many stresses on the rural environment. Please consider alternatives 1 and 3 for smart and manageable growth plan for Clark County	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
161	LeAnne Bremer	9/17/15	1	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.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. You may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
161	LeAnne Bremer	9/17/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
161	LeAnne Bremer	9/17/15	3	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 i-6.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
161	LeAnne Bremer	9/17/15	4	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
161	LeAnne Bremer	9/17/15	5	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.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. A property owner may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
064	Linda O'Leary	9/16/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
064	Linda O'Leary	9/16/15	2	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.	At this stage of the planning process, it is unclear how subsequent projects would result in legal and operational impacts to home owners associations (HOAs). It is possible that changes in zoning could result in HOAs needing to redraw boundaries or amend their bylaws, but due to the high-level nature of this analysis, such conflicts have not been identified.
064	Linda O'Leary	9/16/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
120	Lisa Irwin and Timothy Roddy	9/16/15	1	<p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 .</p>	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. A property owner may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
126	Lynn Carman	9/17/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
126	Lynn Carman	9/17/15	2	<p>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.</p> <p>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 43rd 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 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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
126	Lynn Carman	9/17/15	3	<p>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.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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
126	Lynn Carman	9/17/15	4	<p>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 119th 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.</p> <p>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 disappointed in the leadership here with their hands extended due to their poor choices.</p>	Existing transportation conditions within the county, and potential impacts under the Preferred Alternative, are documented in Chapter 7, Transportation of the FSEIS. The Preferred Alternative was developed based on the planning assumptions provided in Table 1-1, and is intended to provide sustainable growth that benefits the entire community and precludes uncontrolled growth. As stated in Chapter 1 of the FSEIS, "Clark County's Comprehensive Growth Management Plan must address state growth management goals and be consistent with the Community Framework Plan (countywide planning policies), as well as meet the requirements of the Growth Management Act (GMA)." Compliance with the GMA is provided throughout the document, including Chapters 2, 4, 6, 7, and 8.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
121	Marcus and Kristina Becker	9/16/15	1	<p>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 T3nrlewm 5.02a</p> <p>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.</p> <p>Very few lots in this area conform to the 10 acre zone density.</p> <p>I request that my property be rezoned to 2.5 acre density in the alternative 4 plan, and the urban reserve overlay be removed.</p>	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. A property owner may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
125	Marjorie Casswell	9/8/15	1	I am not a city or county planner, but I know that any change in density increases strain on our county's already stressed resources. We should not reduce allowable lot sizes in our rural areas, as doing so means more traffic, more draw on water, increased needs for school, fire and police protection. We cannot afford this.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
125	Marjorie Casswell	9/8/15	2	Also, we need our farm land. We want to buy local as much as possible, and we will not be able to do so if we have turned our farm land into McMansions.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
125	Marjorie Casswell	9/8/15	3	Please, keep the plan the way it is. Make sure we have adequate farm and park land. Only a fool would want us to follow a path to looking more and more like California.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
081	Mark Gawecki	9/17/15	1	Thank you very much for your hard work in the difficult job of planning the future of our county. I understand you will not be able to please everybody with whatever final recommendation you make. From my side I am opposed to alternative 3.1 which would give cities more room to annex rural property. I and my neighbors have been fighting the City of Battle Ground for over eight year <u>years to prevent annexation of our neighborhood.</u>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
081	Mark Gawecki	9/17/15	2	Battle Ground has succeeded in annexing the golf course around the Cedars Neighborhoods creating islands of unincorporated Clark County. We are now seeing the results of this action through the development of high density lower cost housing next to our 1/2 to 1 acre lots. We are experiencing urban sprawl and the potential deterioration of our property values and life style.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
081	Mark Gawecki	9/17/15	3	Let the cities redevelop their own problematic urban areas rather than extend their blight to rural areas.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
078	Marnie Allen	9/16/15	1	<p>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.</p> <p>The La Center School District owns property at the intersection of NW Bolen Street and NW 14th 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.</p> <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
179	Mary Ann Simonds	9/10/15	1	<p>Working on land use planning between here and Florida, I am always proud to use Clark County as an example of good planning and citizen participation. Tonight I would like to bring your attention to information that may influence the Boards decisions on updating the Comp Plan relating to two areas of concern: 1.) Involves an area that was brought into the UGB only because the BGSD requested to build a school and 2.) to considered the benefits of protecting, planning and zoning for a strong equestrian industry.</p> <p>In 1994, the BGSD purchased a property adjacent to a rural residential community just North of WSU. (West of NE 50th Ave, South NE 1741h St) At the time, there was no public input from the surrounding landowners as we watched over 28 acres of a highly diverse ecosystem being clearcut. Neither DNR nor the County was alerted at the time, so no reclamation or reforestation plan was filed - a case of one agency thinking the other one was in charge of the permit Part of the site was also listed under the state as "priority habitat" and it is still in effect today. The neighborhood formed a "neighborhood association (Pleasant Valley Rural Ranch Association) and questioned the BGSD why they would purchase the property in the first place as it did not seem like a suitable property for a school The BGSD indicated they were "looking ahead as it was difficult to find 40 acres near the UGB.</p> <p>In 2005, the neighborhood in the area entered into an agreement with the County, the BGSD, WSU and the local landowners to develop a community plan for the area since the BGSD indicated they truly wanted to build a school. (See Appendix A). In the spirit of collaboration, we all worked together to build trust and good planning tenants even though most residents felt no need to change any zoning.</p> <p>The group conducted several surveys of the residents, met regularly and developed planning recommendations submitted to the Board of County Commissioners on June 7, 2007. (See Appendix B) The County incorporated the recommendations into what they refer to as the Mill Creek Sub Plan. (See Appendix C- only the cover is attached due to the size of the document) Although the majority of the residents did not want to come into the UGB, the Board of County Commissioners directed the group that the area must come into the UGB if a school was to be built. Currently zoning in the County did not reflect the Groups recommendation and it was understood we would continue to work with the County in future planning.</p> <p>The Board also requested a letter from the BGSD indicating they did want to develop the property for a school to ensure they were not just requesting entrance into the UGB for "real estate development potential". The County zoned the BGSD "Public Facility" on top of the zoning to protect it for a school.</p> <p>Currently, the BGSD is wishing to sell the property, after determining it is "surplus lands". This is very confusing and dis-heartening to us, as when asked by the County Commissioners at a public hearing whether the BGSD was sure they wanted to build a school on the property, because the area was not going to have road access or sewer for perhaps 8-10 years, the BGSD response indicated they were looking ahead to 15-20 years and they had full intention to build a school. In the spirit of good planning and collaboration we would like to see the planning in this area re-visited.</p> <p>My recommendations and concerns were presented to the Board in June 6, 2007 and can read in Appendix D.</p> <p>Key Point: The only reason our area, which is limited in development potential because of numerous environmental issues as well as transportation (we have two dead end roads) was brought into the UGB was because the BGSD wished to build a school. If they now do not wish to build a school, I request the Board investigate whether it is appropriate to be in the UGB as we are a low density rural area that has more horses now than we did 20 years ago.</p>	The County has reviewed the request by the City of La Center. The BOCC adopted the request to include 17 acres to the La Center UGA to accommodate a new school site. Please see Chapter 1 of the FSEIS for additional description.
179	Mary Ann Simonds	9/10/15	2	<p>Recommendations:</p> <ol style="list-style-type: none"> 1. Either remove our area from the UGB and return our neighborhood to rural residential, or place an "equestrian district overlay" on us, which has been discussed and presented to the County with the equestrian task force and other community planning bearings "Factoid" - horse propenies in urban areas bring stable demographics and a large amount of tax dollars. Many areas such as Rancho Sante Fe or Wellington, Fl which have urban/rural horse farms have become some of the most desired adn expensive places to live. Ten years ago 70 percent of horses owned lived in rural areas, today more horses owned live in urban areas. 2. The County purchases the property and develops it as a County Park and natural area as it backs up to WSU and can protect the Mill Creek Watershed. Investigate then a Sustainable Master Planned Community on the area that may be suitable for residential development if infill is needed 3. Incorporate Equestrian planning and zoning into the Comp Plan - See Appendix D for resources from the Equine Lands Conservation Resource. <p>Thank you. I am happy to meet with County Commissioners and share more information about the economic advantages of equestrian planning and zoning or the documentation of the Mill Creek Planning efforts.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
067	Mary Byrne	9/13/15	1	Please support Alternative 1 for the new growth management plan. I live in unincorporated Ridgefield. I believe Alt 1 will maintain the best qualities of rural life. The numbers developed in the original plan will accommodate realistic projected rural growth into the future. Please support Alternative 1.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
061	Mary Trostle	9/4/15	1	<p>Please note I am a party of record, Residing at 17210 NE 26th Way Vancouver WA 98684.</p> <p>I have watched in sadness and dismay that large farms are sold to developers who have no regard for the neighbors and citizens of Clark County. We currently have a proposed development on NE 172nd - Cox Family Trust Subdivision.</p> <p>The engineering firm submitted an inaccurate SEPA report, did not manage the logging/construction sites, and allowed subcontractors to break the conditions of logging permits.</p> <p>The ability to effectively manage growth and development by county code enforcement is currently broken.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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061	Mary Trostle	9/4/15	2	I am not in favor of the fourth proposal. It will ruin our fragile environment, put our current and future water resources at huge risk of contamination and will impact our infrastructure (schools, roads, services) negatively.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
109	Michael and Carla Kelly	9/17/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
109	Michael and Carla Kelly	9/17/15	2	Already, where we live in north Clark County, there are issues with wells going dry 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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
109	Michael and Carla Kelly	9/17/15	3	Alternatives 2,3, and 4 will lead to major changes and rapid development. Of course, that would be good for developers, but that is a very short view. In the long view, where is the infrastructure for the sort of development Alts. 2, 3 and 4 are designed to produce? We're talking electrical, municipal sewage and water, schools, overhauling roads, etc., etc., etc. .. Didn't we learn our runaway development lesson with Los Angeles, and more locally, Battleground, Wa., where decades after that spate of unprepared for development, (no doubt sanctioned by the same Clark Co. Commissioners who are trying to foist this new disaster on us) is, at long last, almost connected to 1-5-----but still not yet.	The zoning recommendations posed under each alternative are meant to be strategies for meeting the growth assumptions discussed in Chapter 1, Project Description. The County seeks to plan for growth in a manner that is sustainable and maintains the quality of life enjoyed by its residents. It is not the County's aim to over develop, but to thoughtfully guide development so that community values are maintained as the county grows. The County is required under SEPA to review a range of alternatives; however, it will select its preferred alternative based on how well it would meet the planning assumptions while also reducing environmental impacts.
109	Michael and Carla Kelly	9/17/15	4	All of you Clark Co. Commissioners are "NO NEW TAXES" Republicans, yet you are pushing for the development of our county which will cause our taxes to increase exponentially just to fund your ill-advised land grab scheme. Not on our watch.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
109	Michael and Carla Kelly	9/17/15	5	Go back to the drawing board Boys and research responsible Land Use and City Planning practices and leave our Green and Agricultural Lands Green and Agricultural!	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
115	Michael Benson	9/17/15	1	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	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
115	Michael Benson	9/17/15	2	adamantly oppose ALT 4	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
115	Michael Benson	9/17/15	3	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 time 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 there 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 where 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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS. Additional information on water supplies has also been added to Chapters 3 and 8 of the FSEIS.
115	Michael Benson	9/17/15	4	Choose what is best for whole, not for special interest. Choose ALT 1.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
162	Michael Langsdorf	9/17/15	1	I apologize for the lateness of my comments but I only discovered the deadline at 8 a.m. this morning when reading in the Colombian newspaper the following two articles "final comments sought on County growth plan" and "La Center sewer plan hits big snag".	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
162	Michael Langsdorf	9/17/15	2	<p>I would like to recommend that the urban growth boundary to the west of the city of LaCenter be expanded to contain the tribal grounds located to the west of the present boundaries, but restricted to be only used for commercial, retail or industrial purposes.</p> <p>LaCenter's present tax base, relies to a large extent, on the card rooms and gambling facilities located therein. When the casino- resort with a hotel and shopping center on this 152 acre site is finally built, these card rooms and gambling facilities will no longer generate the income necessary to sustain the present city government and the services it presently provides to the LaCenter citizens.</p> <p>"The Cowlitz tribe and the city have had an agreement for a \$14 million project in place since 2011" to extend sewer services to the tribal land. This agreement has been ruled to not be permitted under the present 20 year growth management plan by a Thurston County Superior Court Judge in August of this year."</p> <p>I believe that the citizens of this city deserve your assistance in retaining and developing their community. The Cowlitz tribe will proceed to develop this land for a casino which will wipe out a major portion of the tax revenues supporting the city since card rooms and gambling establishments presently in place will not be able to compete and the tribe will probably be able to develop a sewer alternative.</p> <p>I would suggest that the expansion of the growth boundaries be limited to only commercial, retail and manufacturing uses which would generate additional employment opportunities and a higher tax base for the entire county.</p>	While the County will continue to work cooperatively with the Cowlitz tribe on potential development, the County has no jurisdiction over lands owned by the tribes.
163	Michael Langsdorf	9/17/15	1	I would like to submit three potential amendments: 1) prohibit any oil refineries; 2) prohibit any oil terminals or facilities that store over 100,000 gallons or 2,381 barrels of petroleum products;3) prohibit the establishment of any coal terminals or storage locations containing more than 50 tons of coal.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
163	Michael Langsdorf	9/17/15	2	These recommendations are based on recent train accidents, spills, fires, deaths, and property destruction caused by leaks as it affects number one and two above due to faulty equipment maintained by the railroads. First responders in our County are not prepared for the crisis created by a major fire. (Presently the railroads bring additional fire suppression equipment only by rail.)	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
163	Michael Langsdorf	9/17/15	3	These uses have the additional potential impact on the Columbia river not only as to humans but to endangered fish species when these petroleum products were brought by rail to our community.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
163	Michael Langsdorf	9/17/15	4	Emergency (fire, police, and ambulances) responses for our citizens will be subject to slower response times due to the need to cross rail lines dogged by mile-long trains.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
163	Michael Langsdorf	9/17/15	5	These uses require large tracts of land with limited employment opportunities but with major greenhouse gas problems resulting in negative climate changes which can be very detrimental to our citizensbut especially our children and our senior population.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
183	Michael Langsdorf	9/17/15	1	I would like to meet with you sometime today to comprehend how to submit 3 amendments to the new Clark County Comprehensive Plan: 1. Prohibiting any oil refineries; 2. Prohibiting any oil terminals; 3. Prohibiting and coal terminals; 4. Expanding the city of LaCenter's growth management boundary for retail, and industrial purposes only but not for any residential uses.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
183	Michael Langsdorf	9/17/15	2	Urban growth boundary to the west of La Center to be expanded for orca – casino- but restricted to be only for commercial retail and rudle-toza. Justification La Center higher tax base, revenues from gambling support cctz and casino goes in they will lose source of revenue and need for approval for sewer ofxusion to their plant and K already signed.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
183	Michael Langsdorf	9/17/15	3	<p>Hoquiam City</p> <ul style="list-style-type: none"> • Recent train accidents spills fires deaths safety measures not effective and major spill or fire. • First responders not prepared for crisis • Greenhouse gases/ climate change • Impact to Columbia River and endangered fish species • Limited emp component us use of land longe tract. • Emergency response to close rail lines always caused by oil trains traffic congestion <p>Fire, Police, Ambulance.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
108	Michael Williams	8/27/15	1	<p>The Washington State Department of Transportation (WSDOT) has reviewed the Draft Supplemental Environmental Impact Statement (DSEIS) for the Clark County 2016 Comprehensive Growth Management Plan Update. WSDOT reviews this document with great interest, as this update could result in a significant increase of traffic on the state highway system, as well as county transportation facilities.</p> <p>WSDOT's vision of providing a sustainable and integrated multimodal transportation system requires us to utilize all available capacity on our system and leverage our limited resources. This is only possible by working together with communities and other partners. WSDOT recognizes city and county plans as the cornerstone of community decision-making. Therefore, we think it is important for WSDOT to participate, listen to and understand these goals and plans. and share WSDOT strategies and policies for implementing a multimodal transportation system.</p>	Thank you for your comment. Clark County appreciates WSDOT's involvement in this process.
108	Michael Williams	8/27/15	2	Four alternatives are currently under review. WSDOT endorses Alternative 1, as this alternative would not change the current UGA boundaries, policies and regulations as adopted in 2007 and updated to July, 2014.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
108	Michael Williams	8/27/15	3	More information is needed for WSDOT to make a determination regarding Alternative 3. However, it appears that Alternative 2 and Alternative 4 would have a significant impact on the state highway system. As noted in this document, these alternatives have a high potential for impacts to the transportation system, due to the great potential for more intensive development spread across a larger geographic area. This DSEIS states that full development under these alternatives would not happen quickly, but incrementally over the planning period. However, the cumulative impact of adding additional transportation facilities to support development allowed under these alternatives could be significant, and would change the character of rural Clark County. It also points out that these infrastructure costs could be prohibitive to the county. Due to limited funding, WSDOT will be challenged in the future to provide the needed infrastructure to provide an adequate level of service for Alternatives 2 and 4.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
108	Michael Williams	8/27/15	4	Therefore, WSDOT respectfully requests that Clark County perform a traffic study of all of the alternatives before a preferred alternative is selected. This study should be adequate to allow the county to make an informed decision by seeing the potential impacts of these alternatives. It should also be able to allow WSDOT and other public agencies to provide a proper response to these proposed alternatives before a preferred alternative is selected.	Additional information and analysis of transportation effects completed as part of the CFP has been added to Chapter 7 of the FSEIS.
108	Michael Williams	8/27/15	5	WSDOT also requests that the comment period for the DSEIS be extended to a date after the transportation study is completed. This comment period should be set to allow sufficient time for WSDOT and other public agencies to incorporate the study in the review and comment on the DSEIS. These comments are based on a review of the DSEIS, and are preliminary only. WSDOT will likely provide additional comments as the 2016 Comprehensive Growth Management Plan Update continues through the development process.	Additional information and analysis of transportation effects completed as part of the CFP has been added to Chapter 7 of the FSEIS.
176	Michele Wollert	9/16/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	2	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: <ul style="list-style-type: none"> • 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. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	3	Population Assumptions Don't Support Alt. 2 and Alt. 4 <ul style="list-style-type: none"> • 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. 	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
176	Michele Wollert	9/16/15	4	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.	Additional information on water supplies has been added to Chapters 3 and 8 of the FSEIS. See also Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
176	Michele Wollert	9/16/15	5	Our current transportation system would not support the needed roads to accommodate the growth that would occur across the rural portions of Clark County.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	6	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	7	Will require new roads, greater maintenance, longer commutes, and consume more energy.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
176	Michele Wollert	9/16/15	8	New parcels will be spread all over the county.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	9	Diminishes the county's ability to attract large scale agriculture.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	10	Creates more housing than is needed.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	11	Would not support state regulations to control sprawl.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	12	New transportation facilities and maintenance would fall to the county with the cost only partially recovered through impact fees.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	13	EIS concludes that the cost for Alt 2 and 4 would be prohibitive.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	14	Needed infrastructure - power lines, schools, support services would change the character of rural Clark County.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	15	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
176	Michele Wollert	9/16/15	16	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 Clark County Agriculture Preservation Strategies Report March 2009 Rural Lands Task Force Recommendations March 2010 Promoting Agricultural Food Production in Clark County, NOV 2013	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
176	Michele Wollert	9/16/15	17	I urge you to reject Alternative 2 and 4. Thank you for considering our vulnerable family farms.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
114	Mike Bomar	9/15/15	1	Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement for the 2016 Comprehensive Growth Management Plan Update. The Columbia River Economic Development Council (CREDC) is a Public/Private partnership working to accelerate business growth and innovation in Clark County, Washington. One of our responsibilities, as outlined in the comprehensive Clark County Economic Development Plan, is to support investment in the infrastructure and planning needed to attract new businesses and talent to this area.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
114	Mike Bomar	9/15/15	2	1. Growth Plan Assumptions: The CREDC supports a strong jobs to household ratio projection and appreciates the County Council's interest in promoting planning for more jobs. We have concerns that the population assumption does not reflect the historical or likely growth anticipated, which will negatively impact the projection for available land for jobs. We appreciate and support a market factor of at least 15 percent for commercial, business park, and industrial land capacity. 2. Table 1.1 Summary of Planning Assumptions: The 2016 Update plans for a significant reduction in the amount of jobs (from 138,312 to 101,153) over the next 20 years. Current and historical activity does not support this type of adjustment.	The population and employment projections were derived from information from the Office of Financial management, and vetted through a third-party analyst. The BOCC reaffirmed the current planning assumptions on February 23, 2016.
114	Mike Bomar	9/15/15	3	Alternatives 2 and 4: The CREDC continues to have concerns on the long term impact that parcelization will have on economic opportunities and availability of viable significant employment sites. We encourage that reconciliation and for rural parcelization to be allowed in a way that protects future employment land opportunities.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
114	Mike Bomar	9/15/15	4	We also have concerns about the infrastructure investment required to service the additional parcels and the potential to limit the availability of infrastructure investments in key employment areas.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
114	Mike Bomar	9/15/15	5	The CREDC recognizing the importance of planning for an adequate supply of employment lands to meet the needs of our target sector employment growth and to provide for more family-wage job opportunities in our community. We encourage the Council to take the time needed to carefully consider and address the implications of the Comprehensive Plan as it will guide our community for the next 20 years. We appreciate the Council's efforts to partner with private and public entities to promote job growth in a way that is fair, strategic, and sustainable. We look forward to working with you to continue to inform this and future planning efforts.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
132	Mike Bomar	9/17/15	1	Critical Areas: The CREDC is concerned that the current vacant lands model doesn't accurately reflect the impacts of critical areas. In particular, the newly implemented Biodiversity area which removes a significant amount of buildable land from the model. The model should be updated prior to plan adoption.	The VBLM has been updated since the publication of the DSEIS. Please see Chapter 1 for a full description of the Preferred Alternative, and Appendix B for a description of the VBLM.
104	Mike Steigelman	9/6/15	1	Agriculture and forest lands should not be degraded to R-10 lots, therefore I support alternative 1, although there are some common-sense adjustments that could be made.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
104	Mike Steigelman	9/6/15	2	Alternative 4, as presented by David Madore will cause great damage to the rural character and livability of Clark County	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
104	Mike Steigelman	9/6/15	3	A large increase in property taxes. New roads, fire, police, schools and infrastructure will be required. Simply having your property divided into two buildable parcels will increase your tax, even if you have no desire to build.	New infrastructure would require some increase in tax revenue. The degree to which a property split into multiple parcels would incur additional taxes would depend on the associated increase in assessed property value.
104	Mike Steigelman	9/6/15	4	Having so many new buildable lots will result in "urban sprawl" with unmanageable, piece-meal development, spreading resources over the county.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
104	Mike Steigelman	9/6/15	5	Quality of life will be adversely impacted. Growth, as would result from Alternative 4, brings an increase in traffic and more noise, light, and water pollution.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
104	Mike Steigelman	9/6/15	6	There will be a net loss of farm and forest land, wildlife habitat and wetlands. Wildlife would also be affected by fragmentation of undeveloped land.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
104	Mike Steigelman	9/6/15	7	The 1999 Comprehensive Plan rezoned land into agriculture and forest land that had apparently been improperly zoned into small lots. Let's not reverse that correction. Land should be rezoned on a case-by case basis, not through a blanket rezone.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
011	Mike Yancy	9/3/15	1	This is another power play by David Madore to get what he wants in this county ,total control over the county.	Thank you for your comment.
075	Monte Phillips	8/6/15	1	As a current land owner in Brush Prairie, I am in full support of alternative #4. This alternative provides those with ownership of land to have control over the property in accordance with State land use laws prior to the 1994 imposition of Clark County.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
075	Monte Phillips	8/6/15	2	This area is no longer affordable for middle class families due to the lack of property available on the market. Alternative #4 will release potential opportunities for families to live in rural environments.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
027	Nathan Ek	9/10/15	1	We also briefly touched on my property in the Yacolt Mountain area. The planning staff apparently decided on their own to exclude the areas zoned as FR80 when collecting feedback from property owners. We, too as property owners feel we should have a say in our futures.	The County has actively worked to engage all stakeholders during the course of this project by sending email notifications; holding workshops, open houses, and public hearings; updating its website with the latest project information; and soliciting comments via email, mail, a web form, and in-person.
027	Nathan Ek	9/10/15	2	I would like to go on record as supporting Alternative 4 proposal of the comprehensive plan update.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
027	Nathan Ek	9/10/15	3	Specifically, I own tax parcel# XXXXXX in the Yacolt Mountain area, and am in favor of changing the lot size to reflect FR10 zoning. Our property and a few others are proposed to be spot zoned on the current alternative 4 as FR40, which does not come close to undoing the wrong created when the zoning was changed from 5 acre lots prior to 1994. We all would like to be zoned similarly to those properties north and South of us which are proposed as FR10. There are many technical justifications supporting this, including the now present public water at the property, as well as good county road access, etc. We also are surrounded on the south and west sides by 5 acre residential zoning. We understand that it may be difficult to get to 5 acre zoning, but as a second alternative, we wish to be included in the FR 10 zoned areas. Please consider the wishes of myself and my surrounding property owners when finalizing the alternative 4 map.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. A property owner may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
069	Peggy Hansen	9/16/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
103	Phyllis Likness	9/17/15	1	I favor comp Plan 3 or 1	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
023	Prem and Indu Sood	9/4/15	1	Alt. 1 - We vote for Alt. 1. Strongly Favor.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
023	Prem and Indu Sood	9/4/15	2	Alt. 3 - Next best alternative, but we don't vote for this alt.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
023	Prem and Indu Sood	9/4/15	3	Alt. 2 - Strongly against.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
023	Prem and Indu Sood	9/4/15	4	Alt. 4 - No way this alt. should be approved/implemented. We are most strongly against this alt.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
100	Randall Pearl	9/15/15	1	Stop pandering to special interests and start considering the real impact of alternative 4 on county infrastructure and services.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
100	Randall Pearl	9/15/15	2	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
098	Raymond Steiger	9/16/15	1	I believe Option 1 is the best option for Clark County	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
102	Richard Dyrland	9/17/15	1	Please accept these comments related to the Water Resources Section in the DSEIS and Comprehensive Plan update for the record on behalf of Friends of the East Fork. We continue to review the record and related data and analysis sources and believe that the following are important points for consideration by the decision makers and also for the record.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
102	Richard Dyrland	9/17/15	2	<p>It is recommended that Alternative-1 be adopted by the Clark County Board of Councilors and the Clark County Planning Commission.</p> <p>A point of clarification that we perceive has not been thoroughly recognized is use of the label "No Action" for Alternative-1. This is a misnomer that conveys to the general public and incorrect understanding of what the alternative is designed to achieve. No-Action implies a "static" program, when in reality it is a "dynamic" program that has undergone a number of transformations since it was first established and implemented. I would ask that future discussions and documents properly reflect these dynamic character of Alternative-1.</p>	<p>It is true that the No Action alternative does not actually mean that nothing would occur. A description of the development potential under the current plan (No Action alternative), under the Preferred Alternative, and the difference between the two, can be found in Chapter 1 of the FSEIS.</p>
102	Richard Dyrland	9/17/15	3	<p>An adequate long-term supply of water is a key component of sustaining a population and economic growth. It is well documented in scientific data, analysis, and numerous reports that the national and regional climate and water situation throughout the United States has been changing and continues to change at an increasing rate. Southwest Washington and Clark County are part of this.</p> <p>Clark County and the Portland area have had a number of ground water and water studies done by the US Geologic Service, WA State Agencies, Clark County and others since the 1950's which identified aquifers, gathered data, described areas of contribution, developed water table levels, and characterized water relationships. These reports are about 10 years or more older. They do not reflect more recent accelerated changes in surface and ground water functioning, conditions, and impacts (Columbia University Water Center. 2014. Assessment of trends in groundwater levels across the United States). As a professional hydrologist who has worked at the regional and national level, I have reviewed all of these older documents as well as new data and analysis to arrive at an updated view of the water situation and trends in Clark County.</p> <p>A review of the WA Dept. of Ecology Well Reporting and Mapping system shows major expansion of wells in areas outside of cities and towns. A checking of some areas indicates that for some reason or other, as much as 20% to 30% of the existing wells are not shown on the Ecology maps. The inference is that we are using a lot more ground water and using it faster than we did in the previous 10 to 15 years in Clark County. It is not just the substantial increase in numbers of lots and acres of expansion that are of concern particularly with Alternatives 2 and 4, but also the location and characteristics of these proposed changes.</p> <p>Rates of storm water runoff, sedimentation, lower infiltration and recharge rates are increasing problems in Clark County. Analysis of stream gage data shows that storm events of a given magnitude are producing higher levels of stream runoff which results in reduced levels of recharge. There has been testimony at the County Councilor meetings over the last year where rural resident express concern about dropping well water levels and loss of entire well systems. In rural areas, accelerated expansion of roads, more wells, which along with associated impacts, will accelerate the rate at which recharge is being reduced. The various aquifers involved are not independent as some may think, and there are areas of interaction between them.</p>	<p>Thank you for your comment. It has been reviewed and considered during development of the FSEIS. Impacts to water resources under each alternative are discussed in Section 3.3.</p>
102	Richard Dyrland	9/17/15	4	<p>There is much use of the term "mitigation" in the discussion of the alternatives and the related direct and in-direct and cumulative effects. After living in Clark County the past 21 years and spending a considerable amount of time gathering and analyzing data on the numerous streams and in the various watersheds, my conclusion is that almost all sectors of "mitigation" are either being consistently misused, to circumvent a range of County, State, and Federal protection and management regulations and laws or are basically ineffective. These were established to protect basic resources from permitting that allowed improper road and building expansion ---but in most cases the mitigation does not work. Shorelines regulations have "No Net Loss" requirements, yet there are a number of recent examples to show that even under current rates of growth, the County is not meeting regulation obligations.</p>	<p>Assessing the effectiveness of common mitigation techniques is outside the scope of this Draft SEIS. The County suggests common mitigation techniques where it is warranted and feasible. However, at this programmatic level, only broad mitigation options are suggested due to the lack of project-level knowledge. Mitigation options would be further refined and vetted as projects are permitted.</p>
102	Richard Dyrland	9/17/15	5	<p>The cumulative effect of all of this also has a substantial negative impact on fish and wildlife in Clark County and Southwest Washington.</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
102	Richard Dyrland	9/17/15	6	<p>Clark County is having difficult times in meeting short-term and long-term water management needs under implementation of the current growth patterns and impacts of Alternative-1. Under Alternative-2 impacts become much more wide-spread and substantially increased. Alternatives 3 is similar to Alternative-1 but has a moderate increase in impacts.</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
102	Richard Dyrland	9/17/15	7	<p>Alternative 4, is not even feasible.and the economic and physical costs of trying to recover from Arternative 2 ot 4 would be prohibitive, have substantial long-term negative impacts on the citizens of Clark County ---and over time might result in a shift to a loss of population and stagnation of economic activity, or at the very least, very high physical, social, and economic costs to sustain.</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
102	Richard Dyrland	9/17/15	8	<p>Again, it is recommended that Alternative-1 be adopted by the Clark County Board of Councilors and the Clark County Planning Commission.</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
096	Rick Dunning	9/10/15	1	<p>As a life long member of rural Clark County and a small timberland owner for the past 25 years, I ask for your support of Alternate 4.</p> <p>I have done everything in my ability, against many odds, to develop a successful multi-generational business plan for this 130 acre parcel near Yacolt. Allowing a small building lot for a family member will he lp maintain this property as a working forest. The original GMA up-zoning to 40 acres is not the needed tool for those who chose to maintain large lot Ag or forestland .</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
096	Rick Dunning	9/10/15	2	<p>The county's supposition that passing Alt 4 will cost the county in additional services and infrastructure is not factual and I can logically explain the errors of those sensational comments.</p>	<p>Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
096	Rick Dunning	9/10/15	3	Alt. 4 lots, when developed through the next 20 years, would be 5-10 acre lots scattered among 250,000 acres of north and east Clark County. Rural lifestyle is valuable to Clark County economically, ecologically, and socially. Help preserve the rural character of Clark County and adopt Alternative Four.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
034	Rita Dietrich	9/10/15	1	I would like to go on record to ask that the Dietrich Family Partnership's two 20 acre parcels be zoned 5 acres. The property is located in the SW 1/4 of Section 13, Township 3, Range 2 EWM. The tax parcel numbers are 194860-000 and 194841-000. Most all properties in the area are zoned 5 acres or smaller. We plan to keep these two parcels in some type of agriculture, but since this is a 20 year plan we want to be prepared for the future. If we only had a crystal to tell us what the future may bring.	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. A property owner may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
157	Rita Dietrich	9/4/15	1	Due to family health problems, I have been unable to attend your meetings. After reading comments made, I realized some people are asking rural citizens to sacrifice another 20 years of not being able to do anything with their property. That is 40 years out of their lives. Those citizens who have acquired property for future retirement planning such as retirements homes, nursing home, etc. will not have that opportunity. Those who are in their later years will be the ones really affected by this action. Rural people moved or have lived for many years in the country will not be building 12,410 houses. That is not realistic and not how most rural folks want to live. There must be a way so the rural citizens do not have to bear all the burden.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
158	Rita Dietrich	9/9/15	1	Due to family health problems, I have been unable to attend your meetings. I am asking to go on record at your meeting on September 10th, 2015 as a supporter of Alternate 4. It seems like having property tied up for 20 years and then another 20 years is too long. This is 40 years out of a lot of rural property owner's life. Alternate 4 would solve that problem. Rural people moved or have lived for many years in the country and they will continue to want their land to remain rural, but still would like to be able to sell a few acres if they desire to do so. I see Alternate 4 as a fair way to treat the rural citizens of this county.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
022	Robert Maul	9/3/15	1	The City of Camas is still in support of Option 3.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
099	Ronald Homola	9/11/15	1	After participating in the meeting on Sept. 10th and hearing all the testimonies, I better understand all the issues you are faced with when making this decision. Thank you for all your work on this and for listening to the citizens of rural Clark County.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
099	Ronald Homola	9/11/15	2	I believe Option# 4 is a big step in the right direction to freeing up the sanctions imposed on Rural Clark County in 1994. The fears of the Option #1 proponents are just fears and are not valid issues that outweigh the loss of a property owners rights. Let us welcome the population growth that we have in Clark County and plan for it. We have a bright future here in Clark County with this valuable resource of young minds and new innovation. They just want to be able to live in a place they can call their own and raise their children away from the corruption that runs rampant in the city. Do not allow selfishness to rule when making this decision. CHOOSE OPTION #4!	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
097	Roozbeh Nazari	9/9/15	1	After lengthy research and a two-month road trip across the country to find a place to put down roots, my partner and I made the decision to move to the Pacific Northwest. A year ago we landed in Clark County, believing it to fit a majority of our criteria for our new home. Our goal and dream is to purchase 20 or more acres to homestead, sustainably harvest firewood, and potentially small-scale farm. We value local food - grown by us, from our weekly CSA share, and from farmers markets. Thinking the area to be rural and agricultural enough to our liking, we have been disappointed. There certainly are farmers and we have been delighted to meet them and hear their stories and struggles. But we fear for the future because there are also ugly subdivision-type neighborhoods that seem to crop up out of nowhere throughout the county with cheap-looking, slapped up houses with cutesy development names souring the landscape. Not to mention the Mc-mansions on five acre properties; what a waste of space and resources. We have also been disappointed by the availability of properties we deem suitable. This has changed since we initially looked 2 years ago before relocating. Not only are there hardly any listed properties with the acreage we want, we would be looking at spending a half million dollars for that amount of acreage and some sort of house on it- not what we had in mind! As we follow the looming update to the Comprehensive Growth Management Plan and all the debate surrounding it, we are further disheartened. Will more ugly housing be allowed to encroach on prime farmland? Will further parcelization mean that our ideal property will never exist? Larger acreages for sale will be even fewer and farther between and likely climbing higher out of our price range as developers look to grab land, subdivide and build. And for who? Walking around the "newly" developed Battle Ground Village, there are very many lots left undeveloped save for a utilities box. It's like a ghost town that never was a town to begin with. While we have been putting down roots in terms of community building and making friends, at this point, we are unsure of our ability and desire to stay in the area. I doubt our story is unique and feel other potential residents will be prohibited from settling here, too. We understand that cities and counties want growth, it's good for jobs and the local economy. People need places to live. However, growth and urban sprawl should entail well connected communities that are also well planned, with sustainability, longevity, and responsible stewardship of natural resources in mind.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
097	Roobeh Nazari	9/9/15	2	We don't support any changes to the existing Comp Plan .	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
016	Roseann Thomsen	9/17/15	1	Having lived in rural Clark County for 30 years, I believe the current growth management plan is satisfactory.	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
016	Roseann Thomsen	9/17/15	2	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.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
071	Sarah Scott	9/11/15	1	Wish I could have made it to a meeting. I hope you are truly sincere when you say an email is worth the same attention as standing up in person. A lot of us can't attend meetings.	All forms of public input, written and oral, are weighted equally. While the County attempts to make its public meetings as accessible as possible, we understand that it can be challenging for all members of the public to be there in person.
071	Sarah Scott	9/11/15	2	My comment is to please consider Alternative One!	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
071	Sarah Scott	9/11/15	3	please avoid Alternative Four.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
106	Scott and Wendy Levanen	9/17/15	1	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
106	Scott and Wendy Levanen	9/17/15	2	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	The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. A property owner may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.
106	Scott and Wendy Levanen	9/17/15	3	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.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
086	Sharon Lindberg	9/10/15	1	I support Alternative 4 for rural landowners.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	1	We support Alternative 1 and 3. Alternative 1 is consistent with RCW 36.70A, the Growth Management Act (GMA), is adequate for the 20 year projected growth and was the preferred option of the DSEIS.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
226	Stephen and Lissa Boynton	9/13/15	2	We suggest we retain Alternative 1 until all members of the council are seated next year to give better representation to the community. There is no reason to rush into a decision that will affect us all for the next twenty years. Any rush will indicate an attempt to steamroll cutting up our agriculture and timber lands.	The County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less). Clark County does not qualify for such an extension.
226	Stephen and Lissa Boynton	9/13/15	3	We are against Alternatives 2 and 4 as it goes against the RCW 36.70A and the GMA. It will adversely affect our community. Counselor Madore appeared to have a bias in favor of the group supporting Alternative 4. He allowed about 4 people to testify twice at both the September 3rd and 10th meeting. We attended both meetings and Counselor Madore explicitly told the September 3rd gathering that a person can testify only once for both meetings and could not testify at each meeting. He also appeared to allow the group supporting Alternative 4 to continue on much longer than 3 minutes until there was an objection from the attending members.	Thank you for your comment. It is outside of the scope of this SEIS process to discuss perceived bias of one of the county counselors. We suggest that you submit a formal complaint to the County.
226	Stephen and Lissa Boynton	9/13/15	4	RCW 36.70A.011 FINDINGS: Finally, the legislature finds that in defining its rural element under RCW 36.70A.070(5), a county should foster land use patterns and develop a local vision of rural character that will: help preserve rural-based economies and traditional rural lifestyles; encourage the economic prosperity of rural residents; foster opportunities for small-scale, rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses that are consistent with existing and planned land use patterns; be compatible with the use of the land by wildlife and for fish and wildlife habitat; foster the private stewardship of the land and preservation of open space; and enhance the rural sense of community and quality of life.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	5	GROWTH MANAGEMENT ACT PROTECTS OUR PROPERTY RIGHTS What about our rights? Most of the land owners came here for the open space and we expect the RCW 36.70A and GMA to protect us from urban sprawl. We have a 27 acres farm that is will adversely affect us and our neighbors by raise taxes, increase congestion, increase traffic and threaten existing wells. We all knew the acreage limitations when we purchased our farm or forest lands. Now a small group of disgruntle landowners want to disregard the RCW, Growth Management Act and their neighbors in order to turn a quick profit. The few cases where a person's property rights have been hurt can be remedied on a case by case basis. There is no need to trample on the other rural land owners.	The GMA states that: "private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions." The zoning and other forms of land use regulation embodied in this planning process are provided to benefit and protect the community. Further, a change in land use would not constitute a taking of private property unless it leaves a particular landowner with no economically viable use of his or her land (Agins v. Tiburon) or truly constitutes an inordinate burden. Federal and state constitutions provide due process protections through the Fourteenth Amendment and article 1, section 3 respectively. Substantive due process requires that a land use regulation be imposed reasonably and fairly. Under this test, a regulation must not only have a legitimate public purpose, but it must also use means that are reasonably necessary to achieve that purpose and do not impose an unfair burden on affected property owners. Please see Chapter 1 of the FSEIS for a full description of the Preferred Alternative.
226	Stephen and Lissa Boynton	9/13/15	6	THE MAJORITY OF RURAL LAND OWNERS ARE AGAINST ALTERNATIVE 2 & 4 We believe most rural land owners are against subdividing the rural lands. I spoke to about 30 neighbors and farmers and almost all were against Alternative 4. I spoke at the La Center Grange earlier this month. The Grange was filled with local land owners. Their positive response to my comments showed they did not want agriculture land split into smaller parcels. Clark County United representatives claim that they represent the vast majority of local land owners but they do not. We have never heard of them and neither have our neighbors. Any person can call themselves an organization and make unfounded claims. We suspect they represent a small group of landowners out to make a quick buck splitting up their lands. This is at the expense of the Growth Management Act and the local community.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
226	Stephen and Lissa Boynton	9/13/15	7	<p>ELIMINATION OF AGRICULTURE, TIMBER LANDS AND OPEN SPACE RCW 36.70A.011 states a goal is to "help preserve rural-based economies and traditional rural lifestyles" and "foster the private stewardship of the land and preservation of open space." It also states the goal is to promote "rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses." These goals are in jeopardy for the following reasons:</p> <p>1. Farm & Timber Lands Require Large Acreages Farming and forest production requires large acreages in order to make it worthwhile and economically feasible. Farm equipment and activities are expensive and not cost effective on a small acreage.</p> <p>A stand of Douglas Fir timber takes 40-45 years to grow until it is ready for harvest. Loggers require a minimum of 3-5 timbered acres to make it profitable due to move in, transportation and clean up costs. Therefore splitting timberlands into 20 acre parcels results in one harvest every 7-10 years. That is a long time to go between paychecks. Agriculture lands also require large acreages as usually irrigation is not feasible. It is very difficult for a farmer to be granted water rights. Production per acre without irrigation goes down so only large parcels are economically feasible. An example is haying. A person will charge you money to "mow" your 1-2 acre lawn but may pay you for free if it is over two acres. That same person will be willing to pay you to hay larger acreages.</p> <p>2. Property Values Rise Making Farming Unaffordable Changing the zoning creates the potential to develop the land. Property values rise for the potential to build even if you do not divide the land. Most of the cost of a parcel is for the building site. Instead of buying 20 acres with one building site, you would have to buy four 5 acre parcels and a total of four building sites at a much higher price. This makes it economically unfeasible to use this much higher-priced land for either farming or timber production.</p> <p>3. Property Taxes Rise Making Farming Unprofitable Increased taxes make farming economically unfeasible and farms close. Rezoning and creating small 1-5 acre parcels often results in creating mini "estates" thus raising property values and property taxes of adjacent parcels.</p> <p>In addition, smaller acreages must show a larger income from farming to have agriculture deferred property taxes. Twenty acre parcels do not have the burden of showing a profit whereas five acre parcels must produce \$7,500/yr to qualify for deferred taxes. The five acre scenario is hard to do with dry land farming.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	8	<p>4. Rural and Urban are Incompatible Forcing Farms Out Urban people move to the country for the open area but often do not understand nor want what comes with adjacent agriculture and timber operations. Complaints include noise and dust from logging operations, odors from livestock and soil improvement activities and concerns about using herbicides for crop production. These complaints put pressure on farmers and foresters and force them out of the area.</p> <p>5. Pressure to Reduce Parcel Size Will Result In The Urbanization of the Rural Area Pressure is placed on local government to keep reducing the size of parcels eventually leading to the loss of farms, timber and open space. Farming resources such as farm labor, tractor rentals and farm equipment become increasingly scarce as farms close. Farmers can't get the resources they need to make a living and are forced to sell. Homes then become the last "cash crop" as productive farm soil becomes covered in cement, asphalt and mini-estates with expansive landscaping.</p> <p>It took 50 years to cover much of the crop lands in southern California. Oregon's Washington County has been covered in the past 30 years. Clark County will soon look like these places if Alternatives 2 or 4 are adopted.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	9	<p>PROPERTY TAXES WILL RISE FOR EVERYONE RCW 36.70A.011 states one goal is to "encourage the economic prosperity of rural residents." Higher property taxes are detrimental to the communities' economic prosperity.</p> <p>Rural Residents Subsidize the Urban Areas Rural areas pay for much of the urban area's services. Rural areas receive 51 cents of service for each \$1 paid thereby contributing to a 49 cent subsidy for the urban areas of the county. Urban areas received \$1.25 in public services for every \$1 paid in taxes. Taxes will rise as urbanization increases. Loss of taxes from agriculture and timber activities will have to be made up from the existing tax payers.</p> <p>Smaller Zonings Increases Property Taxes The County's tax assessor has stated the properties will be taxed on their potential use. As an example, rezoning Ag 20 into Ag 10 increases its potential development value and therefore the property tax. Peter Van Nortwick, our tax assessor said "The potential is what people are paying for ... people buy lots because of the potential to buy a home. If the market value of their land increases, under state law we have to (assess) it at 100 percent of market value."</p> <p>Government Expenses Increase To Pay For Services Keeping urban areas small allows the cities to concentrate their resources and keep the cities vibrant. Subdividing the rural lands spreads county services throughout the county which is inefficient. New roads will have to be built and existing ones must be improved to handle the increased traffic. Additional school and services will need to be provided and maintained.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	10	<p>ELIMINATION OF OPEN SPACE AND LOSS OF THE QUALITY OF LIFE RCW 36.70A.011 states the goals of "preservation of open space" and "enhance the rural sense of community and quality of life." These will be lost. People are attracted to our area due to the open spaces we enjoy. With more homes in rural lands there will be less open space for both urban and rural people to enjoy.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
226	Stephen and Lissa Boynton	9/13/15	11	Congestion will increase along with increased traffic and commute times. Look at what has happened to Washington County in Oregon.	Thank you for your comment. Traffic congestion is discussed in Section 7.3 of the DSEIS.
226	Stephen and Lissa Boynton	9/13/15	12	<p>THREAT TO THE AQUIFER & WATER SOURCE</p> <p>More homes and wells will threaten the public's drinking water. There could be 12,400 new wells tapping into the Troutdale aquifer which supplies drinking water to 95% of Clark County population. Each well increases the chance of contamination. New wells may compete with neighboring wells causing one or more to go dry. North County, particularly in the foothills, already tends to have more than it's share of low producing wells. Sometimes these wells must be supplemented with 1,000 gallon holding tanks in order to make the home site usable. In some areas such as La Center the water is heavily mineralized. With these limitations we need to be careful with the impacts of Alternatives 2 and 4.</p> <p>The aquifer will not be replenished as urbanization occurs. Rain water will be diverted into storm drains rather than be absorbed through soil.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	13	<p>INCREASE FLOODING</p> <p>The potential for flooding increases as soil is covered up with cement and asphalt. Urban areas have more flooding than rural areas. I responded to massive flooding in 1996 in Tualatin as a fire fighter and in Portland as a Coast Guard reservist.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	14	<p>LONG TERM ECONOMIC IMPACT</p> <p>RCW 36.70A.011 goals includes "help preserve rural-based economies and traditional rural lifestyles; encourage the economic prosperity of rural residents; foster opportunities for smallscale, rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses." Alternative 1 does these things whereas Alternative 2 & 4 adversely affects these goals.</p> <p>Long term wealth requires money to flow from outside sources and into the community. Splitting and developing the land only produces short term income and long lasting maintenance issues. Government services do not produce wealth as it takes from local resident's taxes to pay for itself. Longer term wealth is created through timber, agriculture, tourism and manufacturing. We will loose the first 3 income and tax sources if we cut up the farm and timber lands.</p> <p>Timber is a significant source of income and jobs in Clark County. Timber is Washington's second largest manufacturing sector. 79% of Washington's timber is on privately- owned lands and 20% is on state and federal lands. About 80% of the timber supplies local sawmills thus providing local jobs and products. 20% of the harvested timber is exported primarily to Japan. Agriculture products alone contribute \$50.8 million to the local economy. We produce Christmas trees, hay, wine and other crops. Livestock include goats, sheep, chickens, horses, cattle, mules, alpacas, llamas and other animals. Products include wool, mohair, milk and eggs. Farming also supports other businesses related to farming.</p> <p>Agriculture tourism is also a large contributor to the local economy. We have wineries, Pumpkin Patches, and U-Cut Christmas Trees farms to name a few.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	15	<p>SUSTAINABLE LAND USE</p> <p>Planning small cities surrounded with green space of farm and timber lands between each city allows for long term stability. Cities are limited in size and are self- contained for housing & jobs. Keeping cities a manageable size allows for a more efficient use of resources. Farms and timber lands provide cities with local sources of food, timber and recreational opportunities. It also protects the valuable farm soils.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	16	<p>PROTECT DRINKING WATER AND AQUIFER</p> <p>Fewer wells mean less chance of contamination. The aquifer is replenished as rain is absorbed through the soil rather than running off into storm drains. Creeks and streams are protected since they are not the direct recipients of storm drain water that is potentially contaminated with road oils, herbicides, fertilizers and other contaminants. This allows for a better habitat for fish and wildlife.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	17	<p>QUALITY OF LIFE</p> <p>RCW 36.70A.011 states it's goal as the "preservation of open space" and to "enhance the rural sense of community and quality of life." These are maintained with Alternative 1. Open space provides for less congestion, recreation and a higher quality of life. These qualities are why most of us came here. Local farms and forests allow people to get away from the cities easily and enjoy the country.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	18	<p>Wildlife Habitat- RCW 36.70A.011 goals include to "be compatible with the use of the land by wildlife and for fish and wildlife habitat." Most wildlife need open space to survive. Cutting up the parcels into small areas will destroy their habitat, ability to migrate and eventually cause their elimination. Our farm is the home of deer, rabbits, fish, beaver, porcupines, raccoons, coyotes and various birds. Our farm is also on the Pacific Flyway which makes for some wonderful wildlife viewing!</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	19	Flood Control- Flooding is reduced as water percolates into the soil	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
226	Stephen and Lissa Boynton	9/13/15	20	Moderate Weather- The trees and vegetation moderates temperatures with their shade, help block the winds and filter the air of particulates. This is one reason people enjoy going to parks, forests and rural areas.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
184	Stephen Horenstein	9/10/15	1	Washington's Growth Management Act ("Act") contains 13 goals. However, the overarching fundamental policy principles behind the Act are straightforward: Urban Areas will be developed with significant density. Rural areas shall remain Rural. Included in the environmental review very late in the GMA planning process, Alternative 4 flies in the face of maintaining the rural character of those portions of Clark County that have neither been added to Urban Growth Areas or provided with a special designation such as a Rural Commercial Center nor a Rural Industrial Land Bank, both of which are specifically provided for in the Act and allow for Urban density in the Rural areas.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
184	Stephen Horenstein	9/10/15	2	Under Alternative 4, the existing R-5 zones would also contain R-1 (Idu/lac) and R-2.5 (Idu/2.5ac) lots and would add up to 9880 new parcels/12,400 new lots at full build out. The transportation and other infrastructure that this creates are enormous and are required to be addressed in the Capital Facility Plans that must accompany the GMA plan update. Indeed, Alternative 4 will provide <u>for the potential of new development on 65,500 acres!</u>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
184	Stephen Horenstein	9/10/15	3	The impact of Alternative 4 is not addressed in the Supplemental EIS in areas that include transportation, utilities and other public facilities, fish and wildlife resources, water resources and impact on soils and forested areas. If Alternative 4 were chosen, much more environmental review and capital facilities planning would need to be undertaken to be able to defend the GMA plan on appeal. It is the case that the Act, when it became the law of land use planning in Washington, had a profound effect on rural landowners. For some it was a positive; it allowed them to live in a rural environment, perhaps to maintain their farm and protected them from sprawling development. For others, the Act had the effect of eliminating all plans for creating smaller parcels for family members or sale and redevelopment of land long held for this eventual purpose. I have been struck by the fact that for perhaps the first time since the Act became law, the experienced land use attorneys in Southwest Washington, on both the environmental side and the development side, are all of one mind. All of us know from extensive experience that Alternative 4 violates the ACT and will not be upheld.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
184	Stephen Horenstein	9/10/15	4	Every major GMA plan adopted in Clark County to date has been the subject of appeals to the Western Washington Growth Management Hearings Board and sometimes beyond. The introduction of Alternative 4 has created expectations on that part of some rural landowners that will not be met. This unfortunately has become divisive and will most certainly lead to litigation, which will slow down the implementation of the new plan and inhibit growth (Jobs and homes) in Clark County.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
184	Stephen Horenstein	9/10/15	5	<p>The following summary of Washington State Growth Management Hearing Board ("Board") decisions and orders stand for the proposition that Alternative 4 is not a viable proposition under the GMA because 1) the local Circumstances do not support Alternative; 2) Alternative 4 does not reflect Clark County's existing rural landscape; and 3) Alternative 4 does not confine R-1 and R-2.5 lots to Limited Areas of More Intensive Rural Development (LAMIRDS).</p> <p>1. Local Circumstances Do Not Support Alternative 4 In Brodeur v. Benton County, (Case No. 09-1-0010c) Benton County amended its "Future Land Use Map in the Land Use Element" to allow 1,120 acres, originally having a rural maximum density of 1 du/Sac, to have a rural maximum density of Idu/lac- i.e., the same density as R-1 lots under Alternative 4. However, the Board found the amendment to (a) be "inconsistent with the county's Rural Character" and (b) "enabl[ed] prohibited urban growth within a Rural Area," because, among other things, there was "no evidence in the record showing that Benton County considered local circumstances in determining an appropriate density on the subject property, as per RCW 36.70A.070(5)(a)." See Final Decision and Order at 14-20 (May 4, 2009). Consequently, Benton County rescinded the amendment at issue and "re-designated approximately 1, 120 acres of rural lands back to RL-5 [(one dwelling unit per five acres)]." Order of Compliance at 3 (July 16, 2010). In short, Brodeur suggests Alternative 4 is not a viable proposal unless local circumstances support the inclusion of R-1 and R-2.5 lots within the R-5 zones. However, the local circumstances run contrary to Alternative 4. Specifically, the 2004-2024 Clark County Comprehensive Plan (the CCCP), expressly states that "future amendments to the 20-Year Plan map must be made in a manner, which is consistent with the[] general descriptions [provided in] Tables 1.4, 1.5, and 1.6" of the CCCP. (Emphasis added). Per Table 1.4 (the Rural Lands Plan Designation to Zone Consistency Chart), only rural lands that have max densities of Idu/5ac (i.e., R-5), Idu/Oac (i.e., R-10), and Idu/20ac (i.e., R-20) are consistent with being designated as "Rural." In addition, Table 1.4 makes it clear that lots having densities of Idu/2.5ac or Idu/lac must be designated as either "Commercial Rural (CR)" or "Rural Center Residential (RC-1 or RC-2.5). See also CCCP at p. 1-15.</p> <p>2. Alternative 4 Does Not Reflect Clark County's Existing Rural Landscape In Dry Creek v. Clallam County (Case No. 07-20018c), Clallam County allowed "rural densities of less than one dwelling unit per five acres outside of Limited Areas of More Intensive Rural Development (LAMIRDS)." See Final Decision and Order, at 2, 53-64 (Apr. 23, 2008). Upon appeal, the Board concluded that Clallam County "failed to maintain the traditional rural lifestyles of the residents of Clallam County as required by the OMA" because the "the existing rural landscape and the rural character of Clallam County [was] a rural density of one dwelling unit per five acres (1 du/5 acre)." See id. In order to achieve compliance with respect to problematic R2/R W2 land designations, the county implemented a new zoning scheme that "essentially established a rural density of one dwelling unit per five acres." See Compliance Order, at 5-11 (Nov. 3, 2009). In short, Dry Creek suggests that Alternative 4 is not a viable proposal under the OMA because lot densities of 1du/1 ac and 1 du/2.5ac do not reflect the existing rural landscape of Clark County, i.e., a landscape characterized by 1 du/Sac, 1 dull Oac, and 1 du/20ac and densities. See Table 1.4 and Table 3. 1 of the CCCP.</p> <p>3. Alternative 4 Does Not Confine R-1 and R-2.5 to LAMIRDS In Futurewise v. Whatcom County & Gold Star Resorts, Case No. 05-2-0013, the Washington State Supreme Court ordered the Board on remand to reconsider the question of whether RRI (Idu/ac), RR2/R2A (2du/ac), and RR3 (3du/ac) land designations were "rural densities" without using a "bright line rule of one residence per five acres." Order Following Remand From Supreme Court at 2 (Sept. 09, 2011). At the remand hearing, the Board concluded that with respect to the challenged RRI (Idu/lac), RR2 (Idu/2ac), and RR3 zones (Idu/3ac), "noncompliance ha[d] been cured by including such zones in LAMIRDS." Id at 11 . And in Dry Creek, the Board concluded Clallam County remediated similar noncompliance by "clarify[ing] that RI /RWI [(Idu/lac)] lands were confined to compliant LAMIRD zones." Id. at 30-31. In short, Futurewise and Dry Creek suggest that Alternative 4 is not a viable proposal under the GMA because Alternative 4 does not confine land zones having densities greater than Idu/5ac (namely R-1 and R-2.5) to LAMIRDS. It is clear from the above analysis that Alternative 4 will not withstand scrutiny or challenge. If Clark County wants to create more and smaller lots in rural Clark County it must prevail on the legislature to amend the Act to let this happen. The county does not have the authority under the ACT to adopt a plan that is so clearly violative of the ACT as it exists today.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
091	Stephen Zimmermann	9/17/15	1	I'd like to express my strong opposition to Alternative 4. I believe this proposal is short-sighted, would substantially increase urban sprawl and ultimately detract from the many qualities of beauty and environmental appeal that make our county a great place to live. This proposal would lead to substantial deterioration of open space, farm lands, essential sources of local food and forest commodities.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
091	Stephen Zimmermann	9/17/15	2	I especially do not support the concept of "property rights" that leads to potential short-term benefit of a few at the long term expense of the many.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
091	Stephen Zimmermann	9/17/15	3	Additionally, I'd like to add my support for Alternative 1. I believe the growth plan as currently implemented has proven beneficial and productive.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
091	Stephen Zimmermann	9/17/15	4	Current zoning has provided for well managed growth in the county and maximizing benefit to all who live here.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
059	Steve Bacon	9/16/15	1	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.	Alternative 3 is no longer part of the project in its original form. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
059	Steve Bacon	9/16/15	2	On page 1-11 the two bullet points under "Vancouver UGA Urban Reserve" appear to describe the same area ("50th Avenue between 199th and 179th", and "50th Avenue south of 199th")	The text in the FSEIS has been changed to clarify the locations.
059	Steve Bacon	9/16/15	3	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.	Alternative 3 is no longer part of the project in its original form. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
059	Steve Bacon	9/16/15	4	<p>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.</p> <p>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.</p>	<p>Text on page 8-3 has been updated to say: "As a result, Clark County, Clark Regional Wastewater District, and the Cities of Battle Ground and Ridgefield are forming a new regional partnership, the Discovery Clean Water Alliance (DCWA), to treat wastewater."</p> <p>Text on page 8-8 was revised to say: "As stated in Section 8.1.9, the cities of Battle Ground and Ridgefield combined their wastewater treatment resources with Clark County to form the Clark Regional Wastewater District."</p>
057	Steve Foster	9/11/15	1	I request that this opinion in support of Alternative 1 to the Comprehensive Plan Update be submitted to the Public Record.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
057	Steve Foster	9/11/15	2	<p>The Growth Management Act provides for development to occur in urban growth areas where adequate public facilities and services exist or can be provided in an efficient manner. The GMA also is designed to protect the rural and agricultural character of the rural element as previously defined. My understanding is that all cities in Clark County have agreed that all of the projected growth can, and should, occur within the current urban areas.</p> <p>It is also my understanding that much of the many acres made available in 2007 (Comprehensive Plan Update) for urbanization and development went unused as a result of the ensuing recession. There is sufficient acreage available in defined urban clusters to meet the population growth numbers expected in the next 7 years.</p> <p>Alternative 4 seems to be pandering to the special interests of a few. Public policy should not be rewritten based upon the demands of a few citizens who are crying because they cannot realize a return on the investment in land generations ago. Wouldn't it be wonderful if each of us who has invested in the stock market, a 401K, a retirement plan could have some guarantee that local officials would change existing laws in order for me to realize my investment in such plans.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
057	Steve Foster	9/11/15	3	In addition, I oppose Alternative 4 because it would decrease agricultural production capacity and impinge on current and future farm viability. Parcelization reduces the profitability of agricultural operations in many ways.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
058	Steve Nelson	9/1/15	1	<p>Let me introduce myself. My name is Steven Nelson and I have been a resident of Clark County my entire 67 years. Indeed, I am the fourth generation of the Nelson family living here since before statehood. 174th Street was historically named John Nelson Road for my great grandfather, who donated the right-of-way as well as the land for the Finn Hill Cemetery. So we are dedicated to the welfare of this county and have seen a great deal of change, both good and bad.</p> <p>The 1960's through 1980's saw a tremendous growth of suburban sprawl across the county. Our original homestead is gone--replaced by numerous mini-estates upon which no agricultural activity exists. Originally, production off of that property supported a family of nine.</p> <p>For the past 39 years, I've lived on a 30 acre ATFS-certified tree farm in Hockinson, now protected by the Washington Growth Management Act as RT-20. The biggest threat to timberland owners is not clear cutting, its not fire, its CONVERSION-- Converting forest and agricultural land to other uses. You can't get it back. Its forever lost to suburban sprawl.</p> <p>Alternative 4 is in direct violation of the spirit and specific purposes of the Growth Management Act. Indeed, Alternative 4 represents the antithesis of growth management planning. Rather, it is exploitation of lands for the benefit of development and developers. Having a County Councilor have the ego to independently invent a planning option is not consistent with the democratic process embraced by our government. The invention of community action groups to advocate for Alternative 4 is a sham and injustice.</p> <p>Should Alternative 4 be advanced to the state review stage, it will NEVER be approved. Our current councilors have not been around long enough to remember the years of law suits and money wasted to comply with GMA in the first place. We started back then with essentially Alternative 4. Since that time the Forest and Fish decision has come down. The Clean Water Act has come down. Urban infill has worked. Why waste out time trying to deny those decisions and laws?</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
058	Steve Nelson	9/1/15	2	As for for Alternatives 1, 2 and 3, Alternative 2, to expand urban boundaries, would be in the spirit of growth management-- to develop out our cities as they grow.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	1	Thank you for the opportunity to comment on the proposed alternatives for the county comprehensive plan update. I urge you to support either Alt. 1 or Alt. 3 as the options that are the least impactful to the rural community and future viability of agriculture in Clark County.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
180	Sue Marshall	9/17/15	2	<p>Our family bought our 30 acre farm in 1960. We do not have a water right and are dry land farmers. The farm has been in a number of crops starting with a 4,500 tree pear orchard. We converted to berries when market forces compelled us to bulldoze the bulk of the orchard. We currently lease 25 acres to a neighboring farmer who grows grass seed. When the lease is up in 2 years and with a daughter now interested in farming, we will plan to plant filberts, grains, extend the vegetable garden and continue working our remaining orchard.</p> <p>You can successfully farm without water rights but you need larger acreage to be commercially successful as you are limited in the crops that you can grow. It is critical to our future success to have long term assurance that our significant investment in trees and equipment will not be undercut. The AG-20 designation provides us with a shield to protect long term farming for us personally and for the county as a whole. We are planning for multiple generations.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	3	<p>Alt 2 and Alt 4 eliminate the AG 20 zoning countywide and continues forward past bad land use decisions that have fragmented agricultural lands, led to large lot residential sprawl and weakened the viability of agriculture in this county. Drive around the county now and you will see rural residential at its worse - big houses on multiple acres with sprawling lawns. Please do not double down on those previous bad decisions.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	4	<p>Large acreage zoning can protect farmland for the long term when the parcel size is 20 acres or greater. Fragmenting agricultural land and increasing rural residential reduces the amount of land available for farming and will threaten local food security, undermine our agricultural heritage and weakens the economic viability of farming in Clark County.</p> <p>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."</p> <p>Why large acreage farms are important for long term retention of local agriculture:</p> <ul style="list-style-type: none"> • 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 because it shrinks available larger lots so that they are no longer economically viable but also reduces the sizes of lots such that they can no longer serve the purpose of being resource land buffers as required under GMA development regulations. • Large blocks of land dedicated to farming provide more long term stability, sustainability and resilience for agriculture. Anyone who is a regular day to day farmer knows that it is these large blocks that are not susceptible to development that give true farmers a sense of ease knowing that they will be able to continue their Right To Farm practices without having to engage in legal battles with individuals who come out seeking a "rural" lifestyle on a one or 2.5 acre parcel. A farmer can plant an orchard - a 50 plus year investment with some predictability that you won't lose your investment. A farmer can invest in soil amendments, crop rotations and, even at the risk of losing money, crop diversity without having to worry that someone who bought a 1 and 1/2 acre parcel near by, will sue because they do not like the smell of chicken and cow manure or the early morning grind of farm equipment. • Large block farming can support necessary 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 a fact of life and, more than 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. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	5	<p>POPULATION ASSUMPTIONS DO NOT SUPPORT ALT 2 AND ALT 4</p> <p>As sited in the Draft Supplemental EIS the total population growth was revised downward by nearly 7,000 from the previous Comprehensive Plan of 2007. There is no justification for increasing rural residential development as proposed in Alt 2 and 4.</p> <p>In both of these alternatives, development occurs disproportionately in the rural areas and nearly equal in their impact on agricultural lands. 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.</p> <p>Under Alt. 2</p> <ul style="list-style-type: none"> • Increases new lots in rural areas by 8,220 with 1,937 on agricultural lands • Impacts 34,000 acres across the county • 16% of projected population grow in rural areas <p>Under Alt 4</p> <ul style="list-style-type: none"> • 12,400 new lots with 1,958 on agricultural lands • Impacts 65,537 acres across the whole county • 24% of population growth goes to rural - way above the prescribed 10% 	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
180	Sue Marshall	9/17/15	6	<p>ALT 2 AND ALT 4 - A PERSCRIPTION FOR SPRAWL Environmental impacts from these two alternatives would be cumulative to surface water, ground water and fish and wildlife resources.</p> <p>New rural lots would require additional wells and septic systems that would have an impact on natural resources. The EIS does not evaluate the impact to water resources on a site specific watershed basis or where there are existing vulnerabilities in water resources and wellhead protection areas - this does not provide adequate information from which to base a decision. Experiencing one of the driest summers on record it is both short-sighted and cavalier to propose encouraging an additional 8,220 [Atl. 2] to 12,400 [Alt. 4] new wells to tap into the Troutdale aquifer that supplies drinking water to 95% of the population in Clark County.</p> <p>Existing infrastructure would also be stressed under these alternatives. Our current transportation system would not support the needed roads to accommodate the growth that would occur.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative. Additional information on water quality and supply has been added to Chapters 3 and 8 of the FSEIS.
180	Sue Marshall	9/17/15	7	<ul style="list-style-type: none"> Will require new roads, greater maintenance, longer commutes, and consume more energy. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	8	<ul style="list-style-type: none"> New parcels will be spread all over the county. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	9	<ul style="list-style-type: none"> Diminishes the county's ability to attract large scale agriculture. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	10	<ul style="list-style-type: none"> Creates more housing than is needed. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	11	<ul style="list-style-type: none"> Would not support state regulations to control sprawl. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	12	<ul style="list-style-type: none"> New transportation facilities and maintenance would fall to the county with the cost only partially recovered through impact fees. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	13	<ul style="list-style-type: none"> EIS concludes that the cost for Alt 2 and 4 would be prohibitive. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	14	<p>Needed infrastructure - power lines, schools, support services would change the character of rural Clark County.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
180	Sue Marshall	9/17/15	15	<p>For us and our farm it is very personal - my husband's parents and uncle's ashes are scattered under the remaining pear trees. My son got married under the 100 year old king apple tree. We want to keep the land over multiple generations and to support the long term future of agriculture in Clark County. Please keep our rural lands rural and reject Alt 2 and Alt 4.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
222	Sue Marshall and Warren Neth	9/10/15	1	<p>Through your creation of the Preferred Alternative for the Clark County Comprehensive Plan you will be making choices that will guide the long-term make up of our community. Slow Food Southwest Washington is concerned about the impact of Alt2 and Alt4 because they parcelize the rural landscape with broad strokes that do not consider the impacts to current or future economically viable farms.</p> <p>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.</p> <p>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."</p> <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
222	Sue Marshall and Warren Neth	9/10/15	2	<p>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:</p> <ul style="list-style-type: none"> • 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. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
222	Sue Marshall and Warren Neth	9/10/15	3	<p>Population Assumptions Don't Support Alt. 2 and Alt. 4</p> <ul style="list-style-type: none"> • 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. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
222	Sue Marshall and Warren Neth	9/10/15	4	<p>Sprawling Effect of Alt. 2 and Alt. 4 = Inefficient Use of Resources</p> <ul style="list-style-type: none"> • 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. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
222	Sue Marshall and Warren Neth	9/10/15	5	<p>What the Draft Environmental Impact Statement Says About Alt. 2 & Alt. 4</p> <ul style="list-style-type: none"> • 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. 	Per Washington Administrative Code 197-11-444, financial costs are not considered to be elements of the environment under SEPA. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
222	Sue Marshall and Warren Neth	9/10/15	6	<p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
222	Sue Marshall and Warren Neth	9/10/15	7	<p>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:</p> <p>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</p> <p>Clark County Agriculture Preservation Strategies Report March 2009 http://www.clark.wa.gov/planning/RuralLands/ documents/2009%20AgriculturePreservationStrategiesReport.pdf</p> <p>Rural Lands Task Force Recommendations March 2010 http://www.clark.wa.gov/planning/rurallands/ documents/ 10-03 1 0 RL TF-Reconunendati onsReport. pdf</p> <p>Promoting Agricultural Food Production in Clark County, NOV 2013 http://www.clark.wa.gov/public-health/about/documents/FSCProposalDraft.pdf</p> <p>Slow Food Southwest Washington's mission is inspiring people to eat, grow, and share healthy local food. Our goal is to reconnect Southwest Washington with the people, traditions, plants, animals, fertile soils and waters that produce our food. We work to inspire a transformation in food policy, production practices and market forces so that they ensure equity, sustainability and pleasure in the food we eat.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
055	Susan Colby	9/4/15	1	<p>As a citizen of Clark county, I am very much against Alternative 4</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
055	Susan Colby	9/4/15	2	which breaks up our rural landscape -- a sure step towards destroying the livability and character of our county. If you seek an urban county, cross the river. We are not Portland North.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
005	Susan Rasmussen	8/25/15	1	<p>This 2016 comprehensive plan update is required to assure that the county's plan adequately provides for growth, reflects community desires, changing conditions and trends. It is important to the citizens and property owners to have an opportunity to express their concerns, goals, and policies for the future in order to maintain someological control of land use policies that impact their lands. CCCU is grateful to this Board for allowing us the opportunity to present a rural perspective.</p> <p>CCCU envisions growth that will maintain the continuity of our unique rural character, honor rural cultural practices, and enhance the quality of life while protecting the property rights of the rural citizens.</p> <p>It is very evident that rural goals and policies were underdeveloped in plans 1, 2, and 3. There was a need for additional work on another alternative plan than gives balance by providing more importance to private property rights. Alternative 4 was written to better reflect this balance.</p> <p>CCCU has ensured that an entire body of record has been brought before the Board of Clark County Councilors that supports our policies and goals. This record is a necessary tool that provides the county with substantial data for evidence. This record is intended to be used as a resource. However, important data from that record of evidence is absent in the supplemental draft EIS. The evidence that is present appears to be there arbitrarily.</p> <p>This is an important issue as the county is required to show it's work -- demonstrate conclusive evidence in order to justify changes to the county growth plans. The planners should have relied on the data provided in the public record, and deferred to that data in the draft supplemental EIS. By ignoring the data, the planners are dismissing key pieces of evidence that supports policies and conclusions proposed in Alternative 4. Simply put, the public record supports proposals written in Alternative 4.</p> <p>I have taken the liberty of outlining some key elements supporting Alternative 4 that are absent in the draft EIS; but supported in the record:</p> <ul style="list-style-type: none"> * USDA Census of Agriculture, 2012, Clark County profile <p>The ag. industry has experienced profound changes over the years. The Census provides the data to subordinate the need to diversify the county's rural economic base.</p> <ul style="list-style-type: none"> _ Most Clark County farms are not economically viable _ Contributes less to the overall economy of the region _ Farms have gone from small to even smaller. _ Employs less than 1% of the workforce <ul style="list-style-type: none"> *USDA Census of Agriculture, 1950, (historical perspective to establish conditions and trends). * Analysis of the Agricultural Economic Trends and Conditions in Clark County, Globalwise, Inc., April 16, 2007 * Lewis County court case (Lewis County's comprehensive plan was greatly influenced by the diminishing dairy farms migrating out of the area) The courts supported the county's efforts. Lewis County defined the needs of the changing agricultural industry and designated those lands best suited to meet those needs. "The notion that a County must designate all land capable of being farmed is simply wrong." This policy also applies to forestry. *NRCS 1972 Soils Manual, Clark County Profile _ CCCU's soils maps by Clark County GIS _ Clark County metadata for resource lands, "Ariel photography, staff reports." * Pierce County (Hearings board case.) The county used the predominant parcel size when designating ag. lands. The court concluded the predominant size of local farms was instructive. * Wa. State Designated Forest Land, Dept. of Revenue, May 2014 Report (intent of the 5 acre minimum forest land to qualify for the state current use taxation program). "The land must be consistent of a single parcel of 5 acres or more." * Small Forest Landowners Database Validation & Data Analysis Study, Report for Clark County, Wa., Oct. 21, 2002. Submitted by the Rural Technology Initiative, University of Washington, College of Forest Resources. _ 78% of the forested Clark County lands are owned by private landowners _ The state trend is 50% privately owned woodlots _ 93% of the county F-40 lots are non-conforming lots. 5 acre lots predominate. * Census of Clark County parcels in agriculture, rural, and forestry zones _ Predomination of non-conforming lots to their zone sizes _ Lingering issues from CCCU's court case "The result is a plan that gives little regard for the realities of existing rural development in direct contradiction of the terms of the GMA." The Honorable Edwin J. Poyfair, Superior Court Judge * United States Census Bureau: Clark County Profile * CCNRC Green Alternative Details, John S. Karpinski, March 16,1994 <p>Letter to Clark County, Peggy Scolnick, Clark County Planning</p> <p>The County's comprehensive plan of 1994 was written in collaboration with the Clark County Natural Resources Council, and Friends of Clark County. This exclusive policy eliminated the concerns of the rural landowners. The result is an unbalanced plan that fails to recognize the importance of private property rights, a GMA planning goal.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
006	Susan Rasmussen	8/19/15	1	<p>The draft EIS contains many gaping holes and inconsistencies.</p> <ul style="list-style-type: none"> _ The rural and resource lands have not had serious attention in 20 years. Profound changes in county farming are well documented, as well as the small forest land owners. Massive work should be required. _ Adopt a "Beneficial Use Measure" _ The potential contributed beneficial uses, such as commerce and development, should be explored and weighed. _ In every comprehensive plan, the prioritized needs of the cities have been upheld. Without a doubt, the 20 yr. practice of land use management being primarily influenced by the cities has resulted in profound economic and social cumulative impacts on the rural communities. Any economist will spell out the benefits of a diverse economic base. However, the planners' vision of a rural economy can be summed up in just two words; forestry and agriculture. <p>DEIS, Pg. 5-1</p> <p>"Policies and regulations have been developed to ensure the conservation of agricultural, forest, and mineral resource lands, and to protect these lands from interference by adjacent uses, which can affect the continued use of these lands for production of food, agricultural products, timber, or the extraction of minerals."</p>	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
006	Susan Rasmussen	8/19/15	2	<p>In addition, Clark County has a long-standing "right to farm" ordinance that addresses these issues.</p> <p>Pg. 6-3:</p> <p>"Most northern Clark County remains in rural use, with some resource-based industries."</p> <ul style="list-style-type: none"> _ Focus on much needed job growth and a diversified economy in rural areas to satisfy the need for a boost to the rural economy. _ The DEIS contains much language regarding fragmentation of wildlife habitats to make them less usable for species that are sensitive to human disturbance, Priority Habitats, 4-5 _ Historic and Cultural Resources; Pg. 6-4 <p>"Much of the county has been identified as having a high probability for archeological resources, in part because of the area's rich history and its importance as a settlement location." "More intensive development pressures can make it difficult to prevent historic or cultural resources from being disturbed."</p> <p>Far too little has been done to preserve the practices of rural culture and prevent the fragmentation of families. Indeed, the very patterns of parcel development that one sees on the ground in the rural lands, are primarily a result of long-standing, cultural practices that have spanned generations. For the most part, this time-worn cultural practice composes the county's unique "rural character", per GMA. The policy of preserving rural culture is absent in the DEIS.</p> <ul style="list-style-type: none"> _ Alternative 2 _ Countywide Modifications; Rural Lands, Pg. 6-12 "1) The proposal would create one "Forest" comprehensive plan land use designation (rather than the Tier I and Tier II designations currently in existence), and would be implemented by Forest - 80 and Forest 20. This change would also eliminate FR-40 zoning, replacing it with FR-20, reducing the minimum lot area in that zone. The impacts of the change in zoning are minimal since only 10% of the 10,304 parcels are 40 acres -more in size. The change in zoning would have the potential to create approximately 414 new 20 acre parcels to be created in the Forest zone." _ Alternative 4 _ Rural, Agriculture, and Forest Changes, Pg. 6-20 <p>"Resource Lands: Forest Resources. This alternative would change the existing Forest Tier I and Forest Tier II comprehensive land use designations to FR-10, FR-20, FR-40, and FR-80, which would be exactly mirrored by new zoning designations. This feature of the alternative would reduce the minimum lot area in some forest zones even further than Alt. 2. Approximately 563 new parcels could be created at full build-out with this zoning change.</p> <p>For the most part, these parcels already exist in the F zones. 94% are non-conforming to their zone size. The predominant parcel size are 5 acre lots.</p>	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
006	Susan Rasmussen	8/19/15	3	<ul style="list-style-type: none"> _ Absent in the DEIS is important technical data contained the report, "Small Forest Landowners Database Validation & Data Analysis Study, Report for Clark County, Wa., Oct 21, 2002. Submitted by The Rural Technology Initiative, University of Washington, College of Forest Resources: <p>Pg. 9, "With only 1,213 acres (110) parcels of urban parcels in the county, it is significant that 48% of the parcels in the SLFO Database are on the edge of the common forestland. When you add in the 110 Urban parcels, over 51% of the NIPF acreage and the 82% of the NIPF parcels in Clark County are in the urban/rural interface or an urban area.</p> <p>Pg. 11 Land use Description graph: Forestry operations---103 parcels, 61 owners, 25.7 average size</p> <p>Unused land timbered--297 parcels, 232 owners, 9.1 average size</p> <p>Unused land cleared--1,077 parcels, 756 owners, 8.0 average size</p> <ul style="list-style-type: none"> _ Absent in the DEIS is the Washington State Designated Forest Land Dept. of Revenue, May 2014 report: " Wa. State encourages sound forestry practices so that present and future generations can enjoy the many benefits they provide. As a way to encourage commercial forestry in Wa. State, landowners may choose to have their land designated as forest land." _ "The land must be consistent of a single parcel of 5 acres or more. " _ Updates to court cases, Lewis County (state of trends in the dairy industry), Pierce County 	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
137	Susan Rasmussen	8/20/15	1	<p>Chelan county comp plan recognized property rights as a prime issue</p> <p>http://www.co.chelan.wa.us/files/community-development/documents/comps plan/Chelan-CountyComprehensive-Plan Res-2014-135 eff-01JAN15.pdf</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
141	Susan Rasmussen	8/13/15	1	<p>442,800 grew by 23% in 10 yrs.</p> <p>http://www.clark.wa.gov/publichealth/documents/Data%20Sheets/ClarkCountydemographicssheet2014.pdf</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
142	Susan Rasmussen	8/13/15	1	<p>http://www.clark.wa.gov/public%ADhealth/documents/Data%20Sheets/ClarkCountydemographicssheet2014.pdf</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
143	Susan Rasmussen	8/13/15	1	<p>graph</p> <p>http://www.ofm.wa.gov/pop/april1/ofm april1 press release.pdf</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
144	Susan Rasmussen	8/13/15	1	<p>8% of all F-40 parcels are 40 acres or more. 187 lots out of the 2394 zoned F-40 conform to their zone size. 42% of all F-40 parcels are 5 acres and less (1008 lots) 25% of all F-40 parcels are 5.25 - 10 acres (609) 68% of all F-40 parcels are 10 acres or less (1617) 84% of all F-40 parcels are 20 acres or less (2015) 92% of all F-40 parcels do not conform to their zoning size. 5 acre lots predominate the F-40 zone. 64% of all F-80 parcels are 40 acres or less (945) 31 % of all F-80 parcels are 80 acres or more (458) 40 acre lots predominate the F-80 zone (133) 20 acre lots rank second (130)</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
144	Susan Rasmussen	8/13/15	2	<p>Clark County QuickFacts from the US Census Bureau Frequently requested statistics for Clark County. http://quickfacts.census.gov/qfd/states/53/53011.html</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
145	Susan Rasmussen	8/13/15	1	<p>housing building permits Censtats Database http://censtats.census.gov/cgi-bin/bldgprmlbldgdisp.pl</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
146	Susan Rasmussen	8/17/15	1	<p>"responsible official ensures the EIS is written in a responsible manner"; ARTICLE IV. - ENVIRONMENTAL IMPACT STATEMENT (EIS) Code of Ordinances Spokane County, WA Municode Library https://www.municode.com/library/wa/spokane-county/codes/code-of-ordinances?nodeId=TIT11-EN-CH11_10STENPOACARTIVENIMSTFI</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
147	Susan Rasmussen	8/18/15	1	<p>other relationships in EIS important to consider WAC 197-11-448: Relationship of EIS to other considerations. http://app.leg.wa.gov/WAC/default.aspx?cite=197-11-448</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
148	Susan Rasmussen	8/19/15	1	Pierce making corrections to lands inappropriately labeled resource, and lands labeled rural that should be resource. Pierce County, WA County schedules community meetings on rural zoning adjustments http://www.co.pierce.wa.us/CivicAlerts.aspx?AID=2087	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
149	Susan Rasmussen	8/21/15	1	http://www.brian894x4.com/images/PVJR026.jpg http://www.brian894x4.com/images/PVJR026.jpg	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
150	Susan Rasmussen	8/21/15	1	http://www.brian894x4.com/images/JMooreLINC06.jpg http://www.brian894x4.com/images/JMooreLINC06.jpg	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
151	Susan Rasmussen	8/21/15	1	THE HISTORY OF BYCX http://www.bycx.com/CPRRHISTORY.htm	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
152	Susan Rasmussen	9/3/15	1	Listed as one of the Elements of the Comprehensive Plan is the "Growing Healthier Report." This report is also one of three, along with the "Aging Readiness" report, that is listed as resources for the comprehensive plan. I recall that the Board did not authorize this; but the reports are there. Sincerely, Susan Rasmussen Documents - Comprehensive Growth Management PlanCommunity Planning http://www.clark.wa.gov/planning/comp plan/docs.html	The senate passed a bill in 2005 (ESSB 5186 and related bill SB 1565) that amended the GMA to require that communities create plans that promote healthy lifestyles. These reports were conducted in part to fulfill this requirement.
153	Susan Rasmussen	9/3/15	1	Strategies for change, Food Systems Council http://www.clark.wa.gov/public-health/about/documents/RoadmapWorkPlan2012.pdf	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
154	Susan Rasmussen	9/13/15	1	Clark County Profile Labor market profiles of counties in Washington state. https://fortress.wa.gov/esd/employmentdata/reports-publications/regional-reports/countyprofiles/clark-county-profile	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
155	Susan Rasmussen	9/16/15	1	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. 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/AttachmentB Assessment of Resource Land.pdf	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
156	Susan Rasmussen	9/16/15	1	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	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
168	Susan Rasmussen	8/13/15	1	<p>According to the Washington State Office of Financial Management, June 25, 2015 Report: "Washington Population Tops 7 Million"</p> <p>"The state's unincorporated area population increased by 26,300 persons over the previous year. This number would have been 28,000 persons if not for annexation. The top 10 unincorporated areas for population growth in descending order are Snohomish, Clark, Pierce, King, Whatcom, Spokane, Thurston, Yakima, Island and Kitsap."</p> <p>"Unincorporated Clark grew by 4,445 to rank second in the state."</p> <p>Clark: 2015 population: 451,820 increase over 2014:9,020 rank in state: 3 percent increase 2014-15: 2.04% state rank growth %:2</p> <p>United States Census Bureau: Clark County Profile Pop. 2014 estimate: 451,008 Pop. percent change 2010-14: 6% Wa. pop." 11.5% Persons under 18 years, %2013: 25.6% Housing units, 2013: 169,746 Homeownership rate, 2009-13: 65% Homeownership Wa. state: 63.2% Multifam. housing units% 2009-13: 23% "" Wa. state: 25.6%</p> <p>Clark County Public Health: 2014 Population "Clark is the 5th most populous county in the state, with a 2014 population of 442,800. From 2000 to 2010, the county's population grew by 23%. This was the second-fastest rate of growth in the state."</p> <p>"In 2014, just over half of the Clark County population (53%) lived in incorporated areas."</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
169	Susan Rasmussen	8/31/15	1	<ol style="list-style-type: none"> 1. Encourage an economic climate that enables our rural communities to find family wage jobs within the rural area. 2. Protection of private property rights of landowners. 3. Ensure adequate housing that fulfills the housing needs and lifestyles of all segments of the county's population 4. Future development that will compliment and enhance historic patterns of development 5. Respect rural cultural practices 6. Acknowledge local trends in the agricultural and forestry industries 7. Enhance rural quality of life 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
170	Susan Rasmussen	9/11/15	1	<p>Clark County's public participation element has not been optimal. This isn't new. The county has always employed an inclusive policy with the jurisdictions, and the environmental communities. However, according to the Dept. of Commerce, Citizen participation and coordination is valued; it helps to ensure the respect for private property rights.</p> <p>"The term "public participation" implies that those who are affected by a decision have a right to be involved in the decision-making process, and an opportunity to influence the decision."</p> <p>Citizen Participation and Coordination http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Growth-ManagementPlanning-Topics/Pages/Citizen-Participation-and-Coordination.aspx</p>	The County agrees that public participation is a key component of both the comprehensive plan update process and the development of the FSEIS. The County has actively worked to engage all project stakeholders during the course of this project by sending email notifications; holding workshops, open houses, and public hearings; updating its website with the latest project information; and soliciting comments via email, mail, a web form, and in-person. The County seeks to provide a balanced plan for growth that takes into consideration the wants and needs of the entire community, as well as any environmental, economic, or social constraints.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
171	Susan Rasmussen	9/11/15	1	<p>Private property rights is one of the 13 primary goals spelled out in the GMA. All carry equal weight. Without question, all of the County's comprehensive plans, to date, have had little or no regard for private property rights. Respect for private rights was one of the top six planning goals stated by county citizens in the public outreach that was conducted when writing the Planning Policies, and the Community Framework Plan in 1977-79, and the 1992-94 plan. The 1977 Community Framework Plan and Policies was supposed to have a lifespan of 50+ years. Somehow, this important planning element was eliminated, and it disappears from any county comprehensive plan since 1994. The 1994 plan was heartily contested and 64+ landowners filed actions with the Growth Management Hearings Board. When private property rights are not allowed respect, unbalanced plans may result with most of the burdens of impacts placed directly on the rural landowners. The rural landowners deserve to be recognized and their needs heard and addressed this time around.</p> <p>Property Rights http://www.commerce.wa.gov/Services/localgovernment/GrowthManagement/Growth-ManagementPlanning-Topics/Pages/Property-Rights.aspx</p>	<p>The GMA states that: "private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions." The zoning and other forms of land use regulation embodied in this comprehensive plan is provided to benefit and protect the community. Further, a change in land use would not constitute a taking of private property unless it leaves a particular landowner with no economically viable use of his or her land (Agins v. Tiburon) or truly constitutes an inordinate burden. Federal and state constitutions provide due process protections through the Fourteenth Amendment and article 1, section 3 respectively. Substantive due process requires that a land use regulation be imposed reasonably and fairly. Under this test, a regulation must not only have a legitimate public purpose, but it must also use means that are reasonably necessary to achieve that purpose and do not impose an unfair burden on affected property owners.</p>
172	Susan Rasmussen	9/15/15	1	<p>The Chelan County Community Vision Statement is held in high regard. Each county study area wrote a vision statement. Kindly read section IV., Pg . 5, Entiat Valley Study Area: "The plan will strive to maintain the existing quality of life that includes: culture, customs, economy, agricultural opportunities, sense of community, water quality, and recreational opportunities. This plan will ensure the protection of individual property rights, and provide for the right to farm according to historic and recommended practices."</p> <p>Chelan County went to great lengths to craft the community framework plan and the vision statement in 2000: "This document is the product of years of work by the cities, the Citizens Advisory Committees, Rural Coordinating Committees, planning staff, planning commission, and the Board of Commissioners."</p> <p>To insure that the integrity of the work is carried forward as written, advisory committees are maintained and tasked with oversight of the application of the plan. Chelan County still maintains this basic framework plan and vision statement today. The county recently passed the new amendments for their updates this month.</p> <p>Thank you for your time, Susan Rasmussen for CCCU, Inc. http://www.co.chelan.wa.us/files/community-development/documents/comps plan/Chelan-CountyComprehensive-Plan Res-2014-135 eff-01JAN15.pdf</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
206	Susan Rasmussen	9/1/15	1	<p>GMA encourages counties to influence the greatest population growth into UGA's, its policies and provisions also reflect the strong desires of Washington citizens to maintain historical, and viable rural lifestyles. This goal isn't stated in language, but explicitly recognized in several Court and Board decisions. The unstated GMA goal is clearly expressed in the many provisions in the GMA that peak to distinguishing urban living from rural lifestyles. For example, the Act's definition of "urban growth," as "growth that makes intensive use of the land for the location of buildings, structures, and impermeable surfaces." "Rural character", stresses the cultural dimensions of "ruralism." 36.70A.030(14) defines rural character as "patterns of land use and development that foster traditional rural lifestyles and provide visual landscapes that are traditionally found in rural areas and communities. The only stipulation in the act on rural growth is that it can not be "urban in nature."</p> <p>The GMA's overall treatment of the rural areas recognizes the more traditional concept of living, and supports a citizen's ability to rightfully decide to live in a rural setting. This reflects an overall lifestyle choice, not merely a geographical preference for housing.</p> <p>The fact that large numbers of Clark County residents have historically resided outside of incorporated city limits further suggests that many citizens may theoretically oppose high density, urban lifestyles. The historic rural growth patterns of Clark County are based in reality. The patterns are a result of generations of cultural practices. Amazingly, these growth patterns haven't ever been considered important enough to recognize and accommodate in any comprehensive plan update. GMA recognizes the patterns of development as the unique "rural character." On remand in our court action, the county was ordered to amend its comprehensive plan by making reasoned zoning considering existing conditions.</p> <p>Partly as a result of our court actions, local governments are able to designate rural areas that are capable of accommodating however many people they choose ... just as long as the development is reflective of the area's rural character. The court decision represents the continuity of rural values, culture, and lifestyles.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
206	Susan Rasmussen	9/1/15	2	<p>steep slopes MapsOnline, Clark County WA. GIS. can http://gis.clark.wa.gov/maponline/?site=GeoHazards&ext=1</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
207	Susan Rasmussen	8/26/15	1	<p>How are rural communities supposed to form a foundation that fights back against a culture in which it seems the cities are entitled to take the lead in any structured growth plan? How can we best tamp down this entitlement, and bring out the best for the rural communities ... especially concerning rural economic development?</p> <p>Kindly consider this example. The Woodland community is celebrating the grand opening of their new high school. This high school is complete with a football field, stadium seating, and night lights. Years ago, Woodland diversified its economic base away from the timber and agriculture industries. Woodland aggressively expanded the port district and attracted new industries and commerce. New and diverse housing was built to accommodate the expanding jobs. Woodland successfully broadened their tax base.</p> <p>On the other hand, consider La Center's economic situation. La Center has a very limited economic base. It is almost exclusively tied to gambling, timber, and dwindling agricultural activities. La Center has not aggressively expanded its land capacity for industry and commerce. It has neglected to diversify its economic base and is suffering as a result.</p> <p>The "new" La Center High School was built over 20 years ago. The school was obsolete for it's capacity before it was complete. Just last year, the football field, some stadium seating, and lights were finally completed. This massive community project was built with volunteer labor, donated funds, and materials. The one elementary school still shares the campus with the over-crowded middle school.</p> <p>Mario Villanueva, the director of the Wa. State Rural Economic Development Council, has stated that rural communities need to be represented on equal footing among the jurisdictions to ensure their fair share of economic opportunities. This is important as it supports the quality of life for the rural citizens.</p> <p>The cities no longer can expect a free ride at the expense of the rural communities. They need to understand that we also have concerns that are just as important to our culture and way of life, as the urban culture. The domination of the cities shouldn't be tolerated ... but it has become the norm for Clark County. Balance is needed.</p>	Alternatives were included in the DSEIS as directed by the BOCC and the County Community Planning Department. Alternatives were developed based on the planning assumptions provided in Table 1-1, and are intended to provide sustainable growth that benefits the entire community: rural and urban dwellers alike. It is outside of the scope of this project to discuss funding allocation for specific community projects. However, we encourage all community members to actively participate in this comprehensive planning process as it helps inform the County Planning Department and other decision makers as to what improvements are needed and what the community as a whole values.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
208	Susan Rasmussen	9/13/15	1	<p>The public participation element is an important part of building this comprehensive plan. I am forwarding, for your review, what the Dept. of Commerce has written on the subject. "The term "public participation" implies that those affected by a decision have a right to be involved in the decision-making process, and an opportunity to influence the decision. "</p> <p>Please recall Gordy's opening comments for the hearing Sept. 10. He spoke about the planner's early roll. Collaboration with the jurisdictions; "Work with our partners, the cities." Clark County's planning process has been an exclusive one with the jurisdictions, and the environmental communities. This elite partnership is on-going. The County's public process requires much improvement to make it an inclusive with the rural communities.</p> <p>When the 1994 plan was being composed, Clark County sent a request to John Karpinski for his recommendations. Mr. Karpinski was the attorney for Friends of Clark County, Clark County Natural Resource Council. Mr. Karpinski wrote the "Green Alternative." For the most part, this plan became the foundation for the county's present plan. This letter has been entered into the public record. Thousands of acres were downzoned from 1, 2.5, 5 acres, to 20, 40, and 80 acre densities. This was done without any consideration of the realities of the patterns of development that were already existing. For the most part, those parcelized lots were created as a result of rural cultural practices that have endured over generations. The practice supported the economic viability of the farms, prevented the fragmentation of families, and ensured the continuity of the farm. The 1994 plan decimated the rural communities and destroyed our way of life. This was a demonstration of one culture exerting dominance over another. There is no balance. This is wrong. This is why Carol and I are there week after week.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
208	Susan Rasmussen	9/13/15	2	<p>The GMA was passed in 1990. Private property rights were listed as one of the thirteen planning elements. All of the planning elements carry equal weight. That hasn't changed. Recognition of the importance of private property rights is written in comprehensive plans throughout the state. Kindly take a look at Chelan County's plans.</p>	Substantive due process requires that a land use regulation be imposed reasonably and fairly. Under this test, a regulation must not only have a legitimate public purpose, but it must also use means that are reasonably necessary to achieve that purpose and do not impose an unfair burden on affected property owners. Unless the change in the allowable uses is so drastic that it precludes any economically viable use, local governments may down-zone property, or reduce the type, number and intensity of uses allowed without being liable for a "taking" of the property (Penn Central Transportation Co. v. City of New York, 438 U.S. 104 (1978)).
208	Susan Rasmussen	9/13/15	3	<p>It is unfortunate that CCCU is compelled to be present week after week to insure rural voices are heard and recognized. It is unfortunate that property rights haven't ever been considered important enough to recognize in any of the county comprehensive plans. The citizens voiced importance in the 1977-79 Community Framework Plan and Policies, and again in the 1992 scoping process for the 1994 plan . Somehow, this planning element was erased in Clark County.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
209	Susan Rasmussen	9/11/15	1	<p>CCCU recently attended the land use forum presented by the Clark County Food Systems Council. Mr. Tom Trohimovich, the attorney representing Futurewise, was one of the speakers. He said that the agricultural industry contributed \$52 million dollars to the local economy, and there are 1,929 farms. However, he failed to elaborate and recognize a trend. The historical perspective tells a different story.</p> <p>According to the latest USDA Census of Agriculture (2012), Clark County does have 1,929 farms and the main agricultural operations include milk, fryers, and berries. The farmgate value is the total value of crops and livestock produced in the county.</p> <p>The farmgate value of agriculture in Clark County is \$51.8 million from the 2012 Census, but in the 2002 Census of Agriculture it was \$54.4 million ... this figure describes the trend. Dips also occurred in associated area counties. Cowlitz was \$29 million in 2012, and \$30.5 million in 2002. Skamania was \$6 million in 2012, but \$11.5 million in 2002.</p> <p>By comparison; Yakima County had \$843.8 million in 2002, but increased to \$1.65 billion in 2012. In the associated food processing sector of food ; Clark County's 2013 state Dept. of Revenue reported gross sales of \$357 million.</p> <p>Please be so kind as to include this in the comments for the draft SEIS.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
210	Susan Rasmussen	9/11/15	1	<p>The mistruths and absent data in the draft SEIS are tools, used by the writers, to facilitate the downfall of alternative 4. These tools actually advance CCCU's values by exposing misconduct to the public eye and facilitating dialogue on issues of considerable public interest. "Who is really navigating public policy on land use issues?"</p> <p>There are rules that apply when writing an EIS. If these rules aren't respected by the writers and consultants tasked with the job of writing an unbiased draft for proper analysis, how are the councilors supposed to make important informed decisions? How are competing interests .. in this case the private property rights of rural citizens, supposed to get our voices heard? CCCU is now tasked with going through the draft with a fine-tooth comb.</p> <p>What are the motivations of the writers of the draft? By taking it upon themselves to provide their analysis, one would think that Alternative 4 proponents are vigilantes that only want to carve up the county, crowd the highways, deplete water resources .. all for self serving purposes. On the other hand, you have the cities all wanting to lay claim to the future designs of our large lot properties that ' they have locked up and secured for their future use. Where do private property rights enter into the equation?</p> <p>Purpose of the authors is a big factor for consideration, and interpretation. Motivation becomes really important in the decision-making process of the County Councilors. The county's various comprehensive plans are lawfully supposed to serve the entire breadth of all the diverse communities. That has never happened for the rural communities. For nearly two years, CCCU has literally been here week after week demanding attention to insure inclusion. The draft clearly illustrates the poor conduct of the writers, an exclusive process collaborating with the cities, and the environmental communities. The end result is a draft riddled with gaps and faults. Unfortunately, the writers have employed this practice before. CCCU's court decision speaks directly to the faulty process.</p> <p>When engaged in an activity of the entire public's interest, private interests of the writers and consultants need to be set aside. The public's right to honest data outweighs purely private interests ..</p> <p>What the writers failed to realize is that farmers and foresters are operating businesses that are in the public's interest to keep viable. Many counties recognize this ... in particular, Chelan County. Chelan recognizes the needs of the agricultural industries, the importance of options for private property, rural culture, and the importance of property rights. Their ordinances enable the county to maintain an economically viable agricultural industry.</p> <p>Clark County Citizens United respectfully requests that the Clark County Board of Councilors take control of this comprehensive plan.</p>	<p>The purpose of the SEIS is to provide an analysis of the environmental impacts associated with the proposed alternatives. Clark County has not diverged from this purpose. It is not uncommon for public agencies to hire an outside consultant to document environmental impacts. The County maintains its role as the decision maker and final reviewer of the document.</p>
211	Susan Rasmussen	9/16/15	1	<p>Analysis of the Agricultural Economic Trends and Conditions in Clark County For the public record, Draft SEIS</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
212	Susan Rasmussen	8/31/15	1	<p>Major Land Use Considerations: Clark County has traditionally supported small-scale agriculture activities by ensuring a variety of various parcel sizes. Large scale commercial agricultural operations continue to decline, however, changes in agriculture activities to vineyards, nurseries, berries, and organic produce have been evolving. This agriculture shift reflects the larger changes happening throughout the entire state. Many of the new agricultural activities can and are occurring on smaller parcels (reference 2012 Ag . Census). Indeed, Clark County has always been a haven supporting small-scale farming (1950 Ag. Census). The long-term changes in agricultural operations will be influenced in large part by the economic and market demands. It is Clark County's tradition to provide for a wide variety of farming opportunities by ensuring a variety of various parcel sizes.</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
213	Susan Rasmussen	9/10/15	1	<p>Chelan recognizes the needs of the resource based industries, the importance of options for private property, and the importance of property rights.</p> <ol style="list-style-type: none"> Getting a complete list of the additional lots that should be in Alternative A description of a compromise that will satisfy the Cities concerns about a peripheral buffer around the cities that want one. Should corrections/additions to the SEIS and a call for more analysis be submitted in wri 	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
214	Susan Rasmussen	9/15/15	1	<p>Regarding Property Identification Number: 222586000 Property Address: 5300 NE 299th Street, La Center, WA. 98629 Abbreviated Legal Description: #59 SEC 7 T 4N R2EWM 20A</p> <p>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.</p> <p>Five acre parcels are on the south side of our street, NE 299th, and west of us.</p> <p>Please be so kind as to consider our request to AG-5 zoning.</p>	<p>The intent of the GMA and the Clark County Comprehensive Plan is to guide overall development within the rural areas of the County at a programmatic level. A parcel-level analysis is not within the scope of this environmental assessment. A property owner may apply for a zoning change for individual parcels, which are evaluated on a case-by-case basis.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
215	Susan Rasmussen	9/1/15	1	<p>Sprawl is defined by Webster's Dictionary, as "to spread or develop irregularly or without restraint ." This definition implies negative environmental and human health impacts associated with sprawl. Clark County does not support sprawl, but rather development of rural land that is consistent with the historic density patterns, considers the protections of the natural resources and critical areas, and encourages orderly growth patterns. This type of rural development is not sprawl, but rather follows the historic patterns of rural living in Clark County with larger lot sizes used for residential living alongside agricultural and forestry activities or clustered lots with areas of large fields.</p> <p>It is common to find rural development occurring adjacent to built infrastructure such as roads, power, water, electricity, and churches. This type of development is not sprawl, but follows the historical patterns of rural living on larger residential lot sizes in Clark County that have resulted from cultural rural practices. This cultural practice limited fragmentation of rural families and had been supported by the County.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
216	Susan Rasmussen	8/13/15	1	<p>The farmgate value of ag in Clark County is \$51 million from the 2012 Census. However, in the 2002 Census of Agriculture, it was \$54.4 million. By comparison, Yakima County was \$1 .65 billion in 2012 and \$843.8 million in 2002.</p> <p>Farmgate value is the same as the total value of crops and livestock produced in that county.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
216	Susan Rasmussen	8/13/15	2	<p>2012 and 1954 USDA AG. CENSUS REPORTS GLOBALWISE REPORT 4/2007, (C. C. commissioned) Data contained in these reports should have been referenced in the draft EIS. In 1970, C. C. was home to 300 dairy farms. The county now has 4-5. Dairy farming has been replaced by berries and nursery commodities. For the most part, C. C. farmers are senior citizens. There is an underlying reason why young farmers are not migrating to Clark County. Nationwide, 6% of farmers are 35 or younger. Farming is laborious, not a lucrative enterprise and requires a massive capital outlay expense. The exodus of large farms in C.C. is not new. The preponderance of small farms is referenced in the USDA 1954 Ag. Census Report ... this is not new. It is referenced again in the Globalwise Report, 2007. The mass migration of large dairy farms continued relatively unabated despite large lot zoning efforts imposed by the 1994 growth plan. What appears important in these reports is that the size of the parcels for farms is secondary. The size of C. C. farms is historically documented, and unique to our area. This is the important element coming out of these reports.</p> <p>Analysis of the Agricultural Economic Trends and Conditions in Clark County, Wa. prepared by Globalwise, Inc., April 16, 2007 Pg. 26, FINANCING FARMS "One of the notable findings of this analysis is that there are very few agricultural operations financed by commercial or government lenders. Information provided by the Farm Service Agency (FSA) of the U. S. Dept. of Agriculture shows that they have had no new borrowers in Clark County in the last 10 years that have purchased 10 or more acres under the agency's farm loan programs. This is significant because the FSA is the government lender to farm borrowers who do not qualify for standard commercial loans. If FSA is not making these loans, it is also very doubtful that commercial lenders have borrowers who have purchased land and other capital assets. In fact, contacts with several commercial banks identified only one bank which said they had made loans to a few nurseries in recent years."</p> <p>"As the overall economy of C. C. increases, agriculture is a shrinking share. In 2004, agriculture employment accounted for about 1% of the county's total employment. Local agriculture also does not contribute very significantly to local food manufacturing. Less than 4% of the county's food processing is contributed from within the county."</p> <p>"Lack of income and profit by farmers in C. C. has led to reduced land area in commercial farming. This study has identified 145 farms with 3, 113 acres in commercial production. Some of these farms are also leasing land."</p> <p>"Historical trends and existing conditions indicate that the action to expand the UGA boundary is not the cause for the diminishing long-term commercial significance for agricultural production from these lands. The land markets have already signaled that farmers will not bid for land for its agricultural productivity at prices equal to what buyers for homes and other development uses will pay. Farming much of these lands areas in not viable for the long term even though the county has agricultural zoning limits on development, and land owners can receive greatly reduced property taxes through current use agricultural land designation."</p> <p>The 1954 USDA Ag. Census Report states: "Income per farm is slightly below the state average mainly because of numerous, small, part-time farms which outnumber the larger commercial farms."</p> <p>"The historical farm statistics show that C. C. has always been dominated by small family farms." However, small keeps getting smaller. In 1954 it was reported; "Small farms are characteristic of agriculture in C. C. Over 2/3rds of all farms in the county are less than 50 acres in size." In 2002, the census data shows 80% of all farms were less than 50 acres in the county. The average size of a C. C. farm was down to 44 acres and median size was 20 acres." In 2012, 44% of C. C. farms are 9 acres or less. This makes for an average of 4.9 acres per farm.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
217	Susan Rasmussen	9/11/15	1	<p>Clark County has traditionally supported small-scale agriculture activities by ensuring a variety of various parcel sizes The 1994 county Comprehensive Plan changed that policy.</p> <p>Large scale commercial agricultural operations continue to decline, however, changes in agriculture activities to vineyards, nurseries, berries, organic produce and equestrian facilities have been evolving. In the 1970's, Clark County was home to over 300 dairy farms. In 2015, the county has 4-5. Dairy farms require a large mass of land. The migration of the dairies out of the county was happening when the 1994 plan was being proposed. By 1994, the county was down to – 20 dairies. Our resource lands haven't ever been adjusted to accommodate this shift in a major agricultural industry. Lewis County (2007) successfully recognized the massive migration of the dairy industry out of the county in their comprehensive plan. The Courts supported the county in recognizing the, "needs of the industry," and, "not all land is capable of being farmed."</p> <p>This agricultural shift reflects the larger changes happening throughout the entire state. Many of the new agricultural activities can and are occurring on smaller parcels (reference Census of Ag.,2012). Indeed, Clark County has always been a haven supporting small-scale farming (Census of Ag. , 1950). The long-term changes in agricultural operations will be influenced in large part by the economic and market demands (per 2012 Census).</p> <p>It is Clark County's tradition to provide for a wide variety of farming opportunities whether they be commercial, hobby farms, or equestrian related activities. Clark County has the distinct title of being #1 in the state for the horse population. The Clark County Fair demonstrates a vital and robust 4-H community that supports many youth programs from alpacas to robotics. A variety of various parcel sizes ensures this tradition carries forward.</p> <p>In 2006, the Washington State Supreme Court clarified the definition of "agricultural land": " ... It was not "clearly erroneous" for Lewis County to weigh the industry's anticipated needs above all else. If the farm industry cannot use the land for agricultural production due to economic, irrigation, or other constraints, the possibility of more intense uses is heightened." Lewis County v. WWGMHB, 157 Wn.2d 488, 503, 139 P.3d 1096 (2006) Farming profile of Clark county: per USDA Census of Ag. 2012</p> <p>74,758 acres were farmed in 2012, down from 78,359 in 2007. 28,986 acres total cropland, 24,099 harvested cropland, 3,721 irrigated acres 44% of the 1,929 farms have 1-9 acres (851 predominance of small farms) 1,780 farms (92%) had sales values below \$24,999 \$2,398 net cash farm income of operation \$1,243 average per farm 1,247 (65%) of the farm operators relied on non-farm occupational income</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
220	Susan Rasmussen	9/13/15	1	<p>Clark County Citizens United, inc. believes there is sufficient evidence in the record and court decisions to support choosing Alternative 4 as the preferred alternative in the DSEIS. CCCU has forwarded numerous Hearing Board and Washington state Supreme Court decisions in the record, that demonstrate compliance and allow Clark County to adopt such a policy for the rural and resource areas of the county.</p> <p>At the September 10, joint CCPC and CCBOC hearing, two parties gave testimony stating that considering Alternative 4 would be illegal under the GMA. But, the HB decisions and court decisions do not confirm that statement. Deference is given the counties over particular circumstances unique to the individual county that allows flexibility when designating rural and resource lands. In the case of Alternative 4, it simply demonstrates what is on the ground and what was on the ground, prior to adoption of the 1994 Comprehensive Plan. This is a realistic way for the county to keep a legitimate record of what the rural and resource areas of the county are comprised of. Simply making the zone lot size smaller, does not reduce the ability of the lands to continue to be prime soil. Five and 10 acre agriculture land is more than adequate to preserve prime soils for farm land. Likewise, 10 acres is more than adequate to preserve forest soils for forestry.</p> <p>Currently, the zoning does not reflect the reality of the rural and resource lands of small farms and rural lots in Clark County, and corrections need to be made. By zoning land in large lot zoning, the county cannot magically create that size parcel. If it is a five acre parcel of rural or resource land, it should be zoned 5 acre rural or resource. If some parcels are surrounded by such parcels, because they were once zoned as such, then to prevent isolated spot zoning, they should logically be included in the area wide designation. This formula is the basis for Alternative 4 in the rural and resource areas of the county. Numerous counties in Washington state, as well as the GMA, have also used the predominant parcel size criteria as well. Those counties using that formula have not been challenged or overturned in the courts. Alternative 4 is based on many of those policies adopted by other counties.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
220	Susan Rasmussen	9/13/15	2	<p>Alternative 3 has a component that allows three cities to include lands into their UGAs. CCCU believes this portion of Alt 3 is appropriate and ask that just those inclusions of lands requested by the cities be included into Alternative 4. We see that Alternative 2 consideration of 10 acre agriculture and 20 acre forest has already been incorporated into the Alternative 4 proposal and therefore Alt 2 is already been incorporated into Alt 4. The remaining cities, or possibly all of the cities have suggested that a one mile parameter of land be preserved around each city. In review of Alt 4 maps, one can see that has been done, already. Those lands have been proposed for 10 acre zoning, even though parcels within the zones are smaller than 10 acres. Therefore, what has been done in Alternative 4 is a composite of Alt 2, 3, and city requests .</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
220	Susan Rasmussen	9/13/15	3	Alternative 1 changes nothing and should not be the preferred choice because it does not help to meet the housing needs of the future.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
220	Susan Rasmussen	9/13/15	4	Alternative 4 looks at including a cluster and TDR provision, to give landowners the option of future preservation of land, as well as meeting housing needs. Alternative 4 allows for more affordable land or the purposes of resource activity. None of the other alternatives have that provision. Since 1950 the records show that rural and resource lands in Clark County consisted of small lot farms and large rural homesites. Alternative 4 is in keeping with the historical trends, cultural trends and rural character of lands outside the UGAs and should be considered as the most appropriate alternative to be chosen by the Planning Commission and the Board of Councilors within the DSEIS.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
221	Susan Rasmussen	8/25/15	1	This 2016 comprehensive plan update is required to assure that the county's plan adequately provides for growth, reflects community desires, changing conditions and trends. It is important to the citizens and property owners to have an opportunity to express their concerns, goals, and policies for the future in order to maintain some logical control of land use policies that impact their lands. CCCU is grateful to this Board for allowing us the opportunity to present a rural perspective. CCCU envisions growth that will maintain the continuity of our unique rural character, honor rural cultural practices, and enhance the quality of life while protecting the property rights of the rural citizens. It is very evident that rural goals and policies were underdeveloped in plans 1, 2, and 3. There was a need for additional work on another alternative plan than gives balance by providing more importance to private property rights. Alternative 4 was written to better reflect this balance.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
221	Susan Rasmussen	8/25/15	2	CCCU has ensured that an entire body of record has been brought before the Board of Clark County Councilors that supports our policies and goals. This record is a necessary tool that provides the county with substantial data for evidence. This record is intended to be used as a resource. However, important data from that record of evidence is absent in the supplemental draft EIS. The evidence that is present appears to be there arbitrarily. This is an important issue as the county is required to show it's work --- demonstrate conclusive evidence in order to justify changes to the county growth plans. The planners should have relied on the data provided in the public record, and deferred to that data in the draft supplemental EIS. By ignoring the data, the planners are dismissing key pieces of evidence that supports policies and conclusions proposed in Alternative 4. Simply put, the public record supports proposals written in Alternative 4. I have taken the liberty of outlining some key elements supporting Alternative 4 that are absent in the draft EIS; but supported in the record: <ul style="list-style-type: none"> _ USDA Census of Agriculture, 2012, Clark County profile The ag. industry has experienced profound changes over the years. The Census provides the data to subordinate the need to diversify the county's rural economic base. _ Most Clark County farms are not economically viable _ Contributes less to the overall economy of the region _ Farms have gone from small to even smaller. _ Employs less than 1 % of the workforce _ USDA Census of Agriculture, 1950, (historical perspective to establish conditions and trends). _ Analysis of the Agricultural Economic Trends and Conditions in Clark County, Globalwise, Inc., April 16, 2007 _ Lewis County court case (Lewis County's comprehensive plan was greatly influenced by the diminishing dairy farms migrating out of the area) The courts supported the county's efforts. Lewis County defined the needs of the changing agricultural industry and designated those lands best suited to meet those needs. "The notion that a County must designate all land capable of being farmed is simply wrong." This policy also applies to forestry. _ NRCS 1972 Soils Manual, Clark County Profile _ CCCU's soils maps by Clark County GIS _ Clark County metadata for resource lands, "Ariel photography, staff reports." Pierce County (Hearings board case.) The county used the predominant parcel size when designating ag. lands. The court concluded the predominant size of local farms was instructive. _ Wa. State Designated Forest Land, Dept. of Revenue, May 2014 Report (intent of the 5 acre minimum forest land to qualify for the state current use taxation program). "The land must be consistent of a single parcel of 5 acres or more." Small Forest Landowners Database Validation & Data Analysis Study, Report for Clark County, Wa., Oct. 21, 2002. Submitted by the Rural Technology Initiative, University of Washington, College of Forest Resources. 78% of the forested Clark County lands are owned by private landowners The state trend is 50% privately owned woodlots _ 93% of the county F-40 lots are non-conforming lots. 5 acre lots predominate. _ Census of Clark County parcels in agriculture, rural , and forestry zones Predomination of non-conforming lots to their zone sizes _ Lingering issues from CCCU's court case "The result is a plan that gives little regard for the realities of existing rural development in direct contradiction of the terms of the GMA." The Honorable Edwin J. Poyfair, Superior Court Judge _ United States Census Bureau: Clark County Profile _ CCNRC Green Alternative Details, John S. Karpinski, March 16,1994 Letter to Clark County, Peggy Scolnick, Clark County Planning The County's comprehensive plan of 1994 was written in collaboration with the Clark County Natural Resources Council, and Friends of Clark County. This exclusive policy eliminated the concerns of the rural landowners. The result is an unbalanced plan that fails to recognize the importance of private property rights, a GMA planning goal. 	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
224	Susan Rasmussen	9/17/15	1	Now is the time to begin linking all the data together for analysis of the 2016 Clark County comprehensive plan update. As you deliberate this evening, please be aware of the inclusive shift in policy by the Board of Clark County Councilors.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
224	Susan Rasmussen	9/17/15	2	<p>Please recall lead planner, Gordy Euler's opening remarks at this work session when he referred to their collaboration with the cities, "Work with our partners, the cities." This attitude of exclusivity demands attention and profound changes need to occur.</p> <p>The GMA gives importance to the public participation element. The Dept. of Commerce has written: "The term "public participation" implies that those affected by a decision have a right to be involved in the decision-making process, and an opportunity to influence the decision."</p> <p>When the 1994 was being written, Clark County sent a request to John Karpinski for his recommendations. Mr. Karpinski responded with the "Green Alternative Plan." This plan is the foundation for the county's present plan. This letter is in the public record for this comprehensive plan update. It demonstrates the plan was written with an elite, and exclusive collaborative process with the cities and the environmental communities. The present plan employed a very flawed public process and shows grave indifference to the rural citizens. The result is an imbalanced plan. This is a demonstration of dominance of one culture over another. This practice is ongoing today as demonstrated in Mr. Euler's opening remarks on Sept. 10. This practice is wrong and not what GMA intended .</p> <p>Without question, the present plan has disproportionately burdened the rural landowners; socially, culturally, and economically. The rural communities have never been considered, "partners in collaboration." Disregarding the desires and needs of the rural communities has resulted in many degrading impacts. Particularly disturbing is the fragmentation of families that Mr. Pickering referenced in his testimony. This is the inhumanity of the present plan that has gone unrecognized for -20 years.</p> <p>Thankfully, a more inclusive policy shift occurred in January 2015 with the addition of Alternative 4. This inclusive policy was directed by the policy makers, the Clark County Board of County Councilors. However, CCCU isn't seeing this shift carried forth by the planning staff, and the Planning Commission. This inclusive policy is going to require a tremendous change in attitudes by the staff, as well as the commissioners.</p> <p>The GMA was passed in 1990. Private property rights were listed as one of the thirteen planning elements. All of the planning elements (now 14), carry equal weight.</p> <p>Despite being written in the GMA, Clark County's plan gives no recognition of private property rights. Despite the citizens voicing their concerns in the early stages of development for the Community Framework Plan and Policies, private property rights haven't ever been considered important enough to recognize in any of the county's plans and subsequent updates. It is not coincidental that the voices of the rural landowners have also gone unrecognized. This is not compliant with GMA.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
224	Susan Rasmussen	9/17/15	3	<p>Clark County Citizens United, Inc. strongly urges the County Councilors and the Planning Commission conduct a compliance analysis of Alternative 4 to the GMA. While not perfected, Alternative 4 is the plan that most supports private property rights, and is the only plan out of the four presented, that employed an inclusive public process with the rural communities.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
225	Susan Rasmussen	8/4/15	1	<p>The GMA offers direction on how to prepare local comprehensive plans and development regulations to ensure early and continuous public participation. Alternative plans 1,2 &3 were solely written by the planning staff. The only public process these plans received were at the presentations at the four open houses.</p> <p>The methodology used for writing alt 4 improved on the public process with the creation of an "all players included policy." This inclusive policy boosted the quality of the planning process and the plan. For the first time in 20 yrs. of planning, the voices of the rural communities were heard and their needs recognized.</p> <p>The silence of former county commissioners and their failure to act on outstanding issues concerning our 1999 court case speaks volumes. This failure to act is the driving force behind CCCU's insistence to develop a plan that can begin to adequately address our outstanding court issues. Councilor Madore's inclusive policy shift was a giant step in the right direction.</p> <p>CCCU's court actions alone grant us credibility and standing to influence the direction of this update. Common sense would dictate that compliance with a flawed hearings board isn't what we want. We want to see property owners be able to resolve many lingering issues concerning their property rights ... our court cases confirm this.</p> <p>The draft EIS for alt. 4 shouldn't be just about parcel counts, mitigation, change of land use regulations. It's about recognizing a shift in policy towards accountability to remedy lingering land use issues that further stifle economic and social growth. Alt. 4 should demonstrate significant change. Indeed, the 1994 plan, (the result of a flawed process,) created a massive change that downzoned thousands of acres, with resulting economic and societal impacts. To this day, the cumulative effects of the '94 plan on the rural lands haven't been studied. The plan created an artificial interpretation of the county's rural character.</p> <p>In a Legal Studies Research Paper, No. 12-06-04, published June 2012, by Daniel R. Mandelker (Stamper Professor of Law), Washington University in St. Lewis, School of Law, "Implementing State Growth Management Programs: Alternatives and Recommendations," our case is cited.</p> <p>"Washington did not adopt the top-down Oregon approach by creating a state agency to review county comp/lance with the statute. Instead, they created a state appeal board that hears appeals on county comp/lance. Appeal from Board decisions is to the courts, which can correct board interpretations of statutory requirements. As observers have noted, however, this method of review is not entirely successful, and creates comp/lance problems because it relies on citizen enforcement." pg. 314-315</p>	<p>Thank you for your comment. Public involvement conducted for this project is compliant with SEPA regulations. Public input has been accepted throughout the life of this project, and specifically sought at the beginning of the project (scoping) and again at the DSEIS review stage. It is during the scoping period that the public has the opportunity to shape the alternatives evaluated for the SEIS. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.</p>
225	Susan Rasmussen	8/4/15	2	<p>Alt. 4 should show change and make the necessary first steps required to correct the overwhelming majority of non-conforming rural parcels. For the most parts, these parcels proposed in the plan already exist. 93% of all the F-40 lots are non-conforming. For the most part, they are 5 acre parcels.</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
225	Susan Rasmussen	8/4/15	3	<p>Common sense would dictate that after 20 years of neglect of the rural lands, substantial change to the county's comprehensive plan is called for</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
225	Susan Rasmussen	8/4/15	4	<p>Legal Studies Research Paper by Daniel R. Mandelker, 6/2012 Pg. 314 (mentions Brent Lloyd and our case, and McGee & Howell argue for better delineation of proof burdens and standards of judicial review.) Talks of the need for administrative guidance at the state level and a system in which the review of local land use plans is mandatory and does not depend on voluntary appeals in specific cases.</p> <p>"Appeal from board decisions is to the courts, which can correct board interpretations of statutory requirements. As observers have noted, however, this method of review is not entirely successful, and creates compliance problems because it relies on citizen enforcement."</p> <p>http://poseidon01.ssrn.com/delivery.php?10=990100103003011095081029022011015007060083047068050089011071099123008100094123089018020025118033005042003065072022099090126093108038011069020030095115022012092113001001087082094112065088016088068072022119010030089116082109028075031108097078024066124&EXT=pdf&TYPE=2</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.</p>
029	Susan Saul	9/5/15	1	<p>Thank you for the opportunity to comment on the alternatives for the 2016 Comprehensive Growth Management Plan update. I have read the document online and, based on the available information and analysis, I support Alternative 1.</p>	<p>Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.</p>
029	Susan Saul	9/5/15	2	<p>I do not think that Clark County should reduce the minimum lot size in the Agricultural zone from 20 acres to 10 acres or the minimum lot size and density in the Forest-40 zone from 40 acres to 20 acres. Alternatives 2, 3, and 4 do not protect the county's forests, agricultural industry or water resources.</p>	<p>Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.</p>
029	Susan Saul	9/5/15	3	<p>We need to protect our working farm and forest lands through land use planning and policies that prevent waste and fragmentation, stop sprawl, and provide efficient transportation systems, affordable housing and local businesses.</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.</p>
029	Susan Saul	9/5/15	4	<p>We need urban growth areas to save taxpayers and ratepayers money and protect our water resources and rural, agricultural and forest lands. Clark County does not have the water to support doubling the number of lots allowed in the forest and agricultural zones.</p>	<p>Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS. Please also see Chapters 3 and 8 of the FSEIS for additional information on water supplies in rural Clark County.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
029	Susan Saul	9/5/15	5	Reducing minimum lot sizes in alternatives 2, 3, and 4 would allow increased density of development leading to impacts on water resources through an increase in the number of new wells, reducing water supply, and increasing risks of contamination of aquifers, wetlands and streams from an increased number of septic systems. Changing hydrologic function through increased groundwater withdrawals and surface and stormwater runoff would impact wetlands and their buffers, in turn affecting our major watersheds. The East Fork Lewis River is a critical watershed for salmon and steelhead recovery and needs to be protected.	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
029	Susan Saul	9/5/15	6	A 20-acre forest zone is too small to be economically feasible for forest management. It becomes too expensive to prepare, cut and replant a parcel smaller than 40 acres, so reducing the minimum lot size would effectively take current forest lands out of production. The county must also ensure that the use of adjacent lands does not interfere with working forest management and commodity production.	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
029	Susan Saul	9/5/15	7	Reducing development in agricultural and forest lands also has significant environmental benefits, including protecting aquifers and fish and wildlife habitat, including streams and wetlands. Habitat fragmentation is among the most serious of threats to biological diversity, as determined by a consensus of conservation biologists. "Fragmentation" has been defined as the division of natural habitat into progressively smaller patches of smaller total area isolated from each other until the habitat is no longer able to sustain native plants and animals. Habitat fragmentation causes both immediate and time-delayed biodiversity loss. Fragmentation not only removes habitat but also isolates and fragments the lands and waters that fish and wildlife are trying to travel across. Isolation makes it harder for individuals to find mates, have enough nesting sites, and find enough food within a limited foraging area. Alternative 4 would potentially fragment 65,000 acres spread over the county.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS. Habitat fragmentation is discussed in Chapter 4, Fish and Wildlife Resources of the FSEIS.
029	Susan Saul	9/5/15	8	Sprawling land development outside the urban growth areas would increase the need for expansion of public facilities, road improvements and additional transit routes. Alternative 4 would have significant impacts and the burden would fall on all residents in the county to pay for expanded fire and police protection, emergency medical services, public schools, parks and recreation, libraries, and solid waste, water, and power utilities. Property taxes and utility rates might be raised county-wide to support these expanded services.	Thank you for your comment. It has been reviewed and considered during the development of the Final SEIS.
029	Susan Saul	9/5/15	9	Alternative 1 meets our county's needs for land for housing and jobs. We do not need to increase the number of lots in Clark County. I urge the County Council to select Alternative 1 for the 2016 Comprehensive Growth Management Plan update.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
017	Suzanne Kendall	9/17/15	1	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.	The County is not attempting to rush this very important process; however, it is obligated by law to update its comprehensive plan by June 30, 2016. Deadline extensions are only bestowed on small and slow-growing counties (counties that have a population of less than 50,000 and have a ten-year growth rate of 17% or less).
133	Sydney Reisbick	9/8/15	1	Alternative 1 is my preferred Alternative for many reasons. I will only cover one today, as it relates to one Goal of the Growth Management Act.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
133	Sydney Reisbick	9/8/15	2	<p>Goal (8) Natural Resource Industries</p> <p>Maintain and enhance natural resource-based industries, including productive timber, agriculture and fisheries industries. Encourage the conservation of productive forestlands (read soils) and productive agricultural lands (read soils), and discourage incompatible uses. For Clark County, this also includes mineral lands, such as gravel mines.</p> <p>I will start with mineral lands, because that makes a good example of the problems that occur when "discouragement of incompatible uses" has failed.</p> <p>There was opposition to the houses on Livingston Mountain, right on the borders of the mining resource, but the developers and property rights people won. There is now an unfortunate conflict between houses and gravel mining, both mining operations and gravel trucks. Frustration and misery abound. There are reasons for protecting resource lands from encroachment by incompatible uses. (This does not mean that I agree with law-breaking mining operations and law-breaking trucks.)</p> <p>The same is true of forestry. There is noise and there are trucks. A rural buffer between the active timberlands and houses is important to "quality of life" for both forests and houses. Houses scattered in forest also increase danger of forest fire, which does not protect the forestland. If a wildfire should occur because of a house resident, the forester is not protected from an increase in fire insurance rates and the ratepayer for fire fighting is not protected. Houses do not enhance the forestlands.</p> <p>The same is true of agriculture, which makes noise early in the morning, puts smells in different directions, depending on the wind, and takes large machines over the roads. Surrounding the farm with houses sets up untenable tension and the farmer stays fanning only while he can put up with the complaining. The "right to farm" helps, but the best solution is to give the farm a mostly undeveloped rural land buffer.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
133	Sydney Reisbick	9/8/15	3	<p>Alternative 1 leaves the minimally developed rural buffers on the resource lands. Alternative 4 does not. That is how one goal of the GMA is affected by two of the Alternatives.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
134	Sydney Reisbick	9/10/15	1	<p>The bottom line points are that the Draft Supplemental Environmental Impact Statement (DSEIS) fails totally to discuss the quantitative effects of the alternatives on the environment and rural life. Because of the above this the DSEIS is not an adequate analysis for creating a Preferred Alternative.</p>	The County feels that this Draft SEIS provides a sufficient, high-level analysis that is in concert with the expectations of a programmatic evaluation. Impacts assessed at the programmatic level tend to be more general due to lack of knowledge about specifics regarding how the development would actually occur. Additional analysis has been conducted on the Preferred Alternative as described in the FSEIS.
134	Sydney Reisbick	9/10/15	2	<p>Finally, Alternative 4, with its countywide rezoning and changes in minimum lot sizes, violates the goals of the Growth Management Act and significantly changes the nature of rural character.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
134	Sydney Reisbick	9/10/15	3	<p>The DSEIS does not provide quantitative analysis of any of the alternative's impacts on water (streams, aquifers and wells), wildlife and fish habitat, resource lands (protection and use there of), infrastructure (traffic trips, utility services), human health (physical and mental), affordable housing, or transit. The DSEIS does not quantify these effects of the alternatives on Cities, rural centers or rural life.</p>	Impacts assessed at the programmatic level tend to be more general due to lack of knowledge about specifics regarding how the development would actually occur. A qualitative analysis of alternatives impacts on water, wildlife and fish habitat, energy and natural resources, housing, transportation, and public services can be found in Chapters 3 through 8 of the FSEIS. Per Washington Administrative Code 197-11-444, physical and mental human health (beyond exposure to hazardous materials) is not considered to be an element of the environment. An environmental health assessment was not included in this SEIS because it was not identified as an area of concern during the scoping period for this project.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

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134	Sydney Reisbick	9/10/15	4	It states that mitigation is possible but does not define the necessary mitigations or give the effects or costs of mitigations.	At this programmatic level, specific mitigation measures are not assigned due to lack of knowledge about the specifics of each subsequent project.
134	Sydney Reisbick	9/10/15	5	Clearly, Alternative 1 will do the least damage to rural character.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
134	Sydney Reisbick	9/10/15	6	Even Alternative 1 will continue to affect rural water systems, ability to use resource lands, and habitat (see Dennis Dykes, submitted today).	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
134	Sydney Reisbick	9/10/15	7	Private land rights are only one of the many factors to balance within rural character and are not a Growth Management Hearings Board (GMHB) issue. The maintenance of rural character is. The courts have found Alternative 1 and its zoning consonant with both Growth Management and State law on land rights. (Input from Atty. David McDonald).	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
173	Sydney Reisbick	9/15/15	1	<p>Growth does not support itself. Rate-payers subsidize development. Alternative 1 is more frugal than Alternatives 2 or 4</p> <p>EXAMPLE The Cost of extending the sewer from Ridgefield to Salmon 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.</p> <p>\$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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
219	Sydney Reisbick	9/17/15	1	<p>The bottom line is that the Draft Supplemental Environmental Impact Statement (DSEIS) is not qualitative, and not complete and is an inadequate basis for making a preferred plan. Any Final Alternative which proposes county-wide changes in zoning changes or minimum lot size changes should have a full EIS as well as a new capital facilities plan (CFP).</p> <p>The DSEIS fails to discuss all the effects of the alternatives on the environment and rural character (Tim Trohimovich). It does not provide quantitative analysis of any of the alternative's impacts on water (streams, aquifers and wells), stormwater/septic tanks, wildlife and fish habitat, resource lands (protection and use there of), infrastructure (traffic trips, utility services), human health (physical and mental), affordable housing, or transit. The DSEIS does not quantify these effects of the alternatives on cities, rural centers or rural life (See David McDonald and Tim Trohimovich; See FOCC member's individual input on many of these). Proposed mitigations are fuzzy or potentially inadequate (same sources) and may not be enforced.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
219	Sydney Reisbick	9/17/15	2	It is very expensive to build the capital facilities that will be needed by any Final Alternative. We are way behind in building those necessary for the growth projected in Alternative 1. The estimated cost of capital facilities for growth in the Alternative (See 2007 Capital facilities Plan) was between \$900 million and one billion dollars. We, the taxpayers, ratepayers, and bond interest-payers, will pay for much of this construction and mediation. We deserve a serious estimation of the cost of these alternatives. Further costs will come from submitting an alternative that is not congruent with the goals of the state Growth Management Act.	Thank you for your comment. Per Washington Administrative Code 197-11-444, financial costs are not considered to be elements of the environment under SEPA. The Capital Facilities Plan will provide a more detailed assessment of the costs associated with the selected alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
219	Sydney Reisbick	9/17/15	3	<p>Alternative 1 is in compliance with the goals of the Growth Management Act. There is no court case with which it is not in compliance. There is no GMA case with which it is not in compliance. (See David McDonald for FOCC). Alternative 1 is not "no growth". It is growth adequate for expected population growth that we can afford. There are sufficient parcels in both the urban and the rural areas. There are more than enough parcels in the rural area to support a 10/90% urban rural population split.</p> <p>Alternative 1 has a full EIS and a Capital Facilities Plan. It is not clear whether the County's current CFP meets GMA concurrency requirement, much less is funded to complete the mandated projects.</p> <p>If the Final Alternative proposes growth greater than that in Alternative 1, especially in the rural areas, and especially with countywide changes in zoning and minimum lot sizes, both a full EIS and a new CFP must be done.</p>	The No Action Alternative was intended to reflect no proposed changes to the current Comprehensive Plan as opposed to "no growth." Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
219	Sydney Reisbick	9/17/15	4	<p>CCCU appeal issues have already been resolved by the WWGMHB, the County and the courts (See David McDonald, submitted 9/14/15).</p> <p>Property rights: Property rights, as defined by the courts, are security of the right to use your land, not to divide it. If these bodies had ruled that property rights meant that your individual property rights were being violated, then people would be suing the county to allow for them to divide and sell their lands.</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
219	Sydney Reisbick	9/17/15	5	Variety in sizes of rural lots: In Alternative 1, Clark County has an approved variety of rural parcel sizes: Regular rural area has parcels of 20, 10 and 5 acres. Rural centers have lots of 1.5, 2.5 and 5 acres. Further, a court just ruled in a Kittitas County appeal that 3 acres are not rural because they could not demonstrate that 3-acre parcels would maintain rural character (Ed Bane, Supreme Court of Washington, Feb. 23, 2015.)	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
219	Sydney Reisbick	9/17/15	6	Definition of farmland in farming zone: CCCU has held that only classes 1 and 2 of farm soils should be considered for farming zones and has shown maps that show zones larger than those two classes of farmland. However, the past maps have been based on using all appropriate soil classes and those classes are entirely congruent with the current zones, and this has been approved for Alternative 1 (See David McDonald, map input for FOCC).	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
219	Sydney Reisbick	9/17/15	7	CCCU has not been shut out of the process, as they have been involved from the very beginning (David McDonald, submitted 9/14/15).	The County has actively worked to engage all project stakeholders during the course of this project by sending email notifications; holding workshops, open houses, and public hearings; updating its website with the latest project information; and soliciting comments via email, mail, a web form, and in-person.
219	Sydney Reisbick	9/17/15	8	The rural area has not been frozen for 20 years. On the average over 20 years, Clark County has been issuing over 600 new building permits a year. They have lowered the rural minimum lot size to 5 acres for one zone. A cluster ordinance has been added. Code has been added for wineries, kennels and worker housing. The County has allowed detached Guest Houses. A proposal for an Alternative Access Dwelling Unit (not combined with a guest house) is in discussion.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
045	Taw Huston	8/10/15	1	I was curious if anyone could tell me when the proposed change of the Ag-20 to Ag-10 zoning would begin to take place.	Thank you for your comment. If the Board chooses to include the proposal to change AG-20 to AG-10 in the 2016 Comprehensive Plan update, it would take effect after Department of Commerce approval and BOCC adoption of the Comprehensive Plan.
018	Terry Conner	9/17/15	1	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.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
018	Terry Conner	9/17/15	2	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.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
053	Terry Eaton	9/3/15	1	I am concerned that the Comprehensive Plan ensure the support needed for family farms to grow and thrive in our community. The Family Farm is the back bone of our food supply system, and our community. In order to meet the needs of our farmers, the minimum 20 acre lots must be maintained. When they are broken up into smaller lots, it becomes not only harder to grow enough to support the farm, the lots tend to become more expensive, and demand on water increases, again increasing the cost of farming to our neighbors.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
053	Terry Eaton	9/3/15	2	The desire to break lots into 1-5 acre lots, appears to be in order to expand the urban growth boundary, with the focus on high end housing. To the best of my knowledge, there is no significant shortage of high end housing. What this community needs and demands is affordable low cost housing, of which there is none. We have a large homeless community, which is growing every day due to the unavailability of housing the average, and minimum wage earner can afford. This is the area that must be addressed before any consideration is given to increasing the inventory of overly expensive housing .	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
053	Terry Eaton	9/3/15	3	It was also pointed out that in order to expand work opportunities there needs to be an inventory of large acreage available for businesses to purchase. The division of 20 acre lots into smaller lots, will increase the cost, and reduce the availability of affordable lots, for new businesses to expand, or move into the area.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
053	Terry Eaton	9/3/15	4	I prefer option 1.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
001	Tim Trohimovich	9/10/15	1	We also recommend that Alternative 1 be identified as the preferred alternative because it meets community needs with the lowest cost and the lowest environmental impact.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
001	Tim Trohimovich	9/10/15	2	While we believe the Draft SEIS overall is well done, we do identify some impacts that were not adequately addressed in the Draft SEIS and should be addressed in the Final SEIS. Alternative 4's smaller lots rural sizes will contribute to the failure of onsite waste disposal systems polluting ground water and causing disease. The SEIS must disclose this serious adverse impact, but does not do so violating SEPA The Draft SEIS, in Figure 2-3: Soil Limitations to Septic Sewer Systems on page 2-6, documents that most of Clark County is "very limited" for the use of onsite sewer systems. Alternative 4 would eliminate the R-10 and R-20 zones and R-1 and R-2.5 zones would be added and the R-5 zone retained.2 Marylynn Yates, in a peer reviewed scientific journal, analyzed ground water pollution from septic tanks. She concluded that septic tanks are major contributors of waste water, septic tanks are the most frequently reported cause of ground water contamination, and the most important factor influencing ground water contamination from septic tanks is the density of the systems.3 Lot sizes associated with ground water contamination cases ranged from less than a quarter acre to three acres.4 More recent studies support these conclusions. For example, an "observational study identified septic system density as a risk factor for sporadic cases of viral and bacterial diarrhea in central Wisconsin children. "5 The greater the density of septic tanks the greater the likelihood of diarrheal disease.6 And the highest septic tank densities studied were one septic tank per 11 acres.7 Given the large areas of the county that are "very limited" for the use of onsite septic systems and that most of the rest of the county is "somewhat limited," onsite waste disposal systems serving the new R-1 and R- 2.5 zones allowed by Alternative 4 are very likely to fail, pollute ground water, and cause disease in humans, especially in children. The SEIS on page 2-2 very briefly mentioned the fact that most of the county is limited for the use of onsite septic systems, but does not identify the scientific fact that Alternative 4 will increase septic failures, ground water contamination, and disease in children. The SEIS must disclose these impacts to comply with the Washington State Environmental Policy Act (SEPA).8	Alternative 4 is no longer being considered. It is true that any new rural development would likely result in an increase in septic systems because sewer and water services are generally not provided in rural resource areas. Section 2.1 of the FSEIS states that: "all septic systems within the county are reviewed prior to permitting by Clark County to ensure that they would function appropriately and that no contamination of surface or ground water is likely to occur." It is not possible for this analysis to predict the number of septic systems that could fail, or the amount of contamination that could happen due to those failures. The FEIS acknowledges that the increase in the number of systems also increases the likelihood of contamination. Each permit for a new septic system would be evaluated on a case-by-case basis for the specific site conditions. The County reserves the right to impose additional conditions on a permit to insure that new septic systems are built to function properly.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
001	Tim Trohimovich	9/10/15	3	<p>Alternative 4's smaller lots sizes for agriculture and forest lands will not protect farm and forest land and will likely result in smaller lots and therefore increase the per acre price of farmland, hastening the conversion of farmland to vacant land or other uses. Alternative 2 will "change parcels zoned FR-40 to FR-20, thus reducing the minimum lot area in that zone. An estimated 460 new parcels could be created under full buildout conditions with this proposed zoning change."9 Alternative 2 also proposes to "change areas zoned AG- 20 to AG-10, reducing the minimum lot area in that zone. An estimated 1,937 new parcels could be created under full build-out conditions."10 The Draft SEIS on page 2-5 in discussing the Alternative 2 states: However, the reduced minimum lot areas under the revised zoning requirements create more divisible areas. Regardless, the GMA would still require local jurisdictions to identify and protect agricultural and timber lands of long-term commercial significance. Therefore, provided the reduced lot sizes do not result in conversions to other uses, there would be no additional impacts related to soils under this Alternative. Alternative 4 "would add FR-10 and FR-20 to the existing FR-40 and FR-80 zones. It would reduce the minimum lot area in some forest zones even further than Alternative 2. Approximately 563 new parcels could be created at full build-out with this zoning change."11 Alternative 4 would also "eliminate the AG-20 zone and replace it with AG-5 and AG-10 zones. Approximately 1,958 new parcels could be created at full build-out with this zoning change."12</p> <p>The Draft SEIS on page 2-7 in discussing the Alternative 4 states: Both agricultural and forest lot areas would have reductions in minimum lot size areas even further than that of Alternative 2. More divisible areas could potentially result in increased activities on these lots but provided that reduced lot sizes do not result in conversions to other uses there should be no substantive changes or impacts related to soils under this Alternative. However, the reduced minimum lot sizes and densities in Alternatives 2 and 4 will not conserve agricultural and forest land as the Growth Management Act requires. In the Soccer Fields decision, the Washington State Supreme Court has held that [t]he County was 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. 13 A ten acre or five acre minimum lot size and density will not meet this standard. Professor Arthur C. Nelson analyzed agricultural land preservation techniques and concluded that "[m]inimum lot sizing at up to forty-acre densities merely causes rural sprawl-a more insidious form of urban sprawl."14 In 2012, the American Farmland Trust identified the land use regulations necessary to protect farmland and concluded that to "make substantial progress protecting farmland in the Puget Sound region, minimum parcel size would be at least 40 acres and preferably larger."15 This recommendation is consistent with Professor Nelson's recommendation and would apply to Clark County. Clark County's average farm size has increased from 37 acres in 2007 to 39 acres in 2012, an increase of 5.4 percent. 16 During the same time period, Washington's average farm size increase by 4 percent. 17 The increase in average farm size does not support a reduction in the minimum lot size or an increase in density.</p> <p>Rather than reducing the minimum lot size, which will not protect agricultural land from incompatible development as Professor Nelson's analysis shows, the county should maintain or increase the minimum lot size and adopt exclusive farm use zoning.18 This is the path that Skagit County is taking to protect its farmland. 19 Like agricultural lands, Clark County must also assure the conservation of forest lands and assure that the use of adjacent lands does not interfere with their continued use for the production forest products.20 A ten or twenty acre forest zone will not meet these requirements. Parcels smaller than 40 acres have much lower timber harvest rates and are more likely to be converted to residential land uses. 21 Parcels smaller than 50 acres have higher than average costs for preparing timber sales, harvesting trees, and reforesting the site.22 So reducing the minimum lot size and density below 40 or 50 acres will not protect forest land as the Growth Management Act requires. Rather the minimum lot size should be retained. Further, we recommend that Clark County follow Whatcom County's example and prohibit residential uses in its zone that applies to forest land of long-term commercial significance except for living quarters for those who are engaged in forest management activities on the property, such as fire crews and logging crews, and watchpersons. These uses are reviewed as conditional uses. 23 In addition, research shows that the smaller the parcel of land, the higher the per acre cost of the land.24 So by reducing the agricultural and forest minimum lot sizes and allowing the subdivision of agricultural and forest land into smaller lots, Alternatives 2 and 4 will increase the per acre cost of forest and farm land. This changes may well increase the costs above what farmers and foresters can pay for resource lands, resulting in the conversion of farm and forest land to other uses. Unfortunately, "[o]ne of the key obstacles [to agriculture] in Clark County is the limited access to high quality agricultural land at an affordable cost."25 This is one of the reasons why 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. 26 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."27 So the SEIS should state that the reduced minimum lot sizes and increased densities in Alternatives 2 and 4 will lead to the conversion of agricultural and forest land. The SEIS should also note that this violates the Growth Management Act requirement that Clark County must conserve these lands.</p>	<p>It is impossible to know at this time how the reduction of lot sizes under the Preferred Alternative would affect the price of farmland, or how much of that land would be converted to other uses.</p> <p>It is correct that all local and state protection for agricultural and timber lands of long-term significance would remain. However, increased activity due to smaller lot sizes, even without a change in use, could result in changes and impacts to soils. For example, if a lot containing a commercial nursery zoned for Forest 40 (FR-40) is rezoned to FR-10, and is subsequently subdivided into four parcels, there could be development of additional commercial uses on those three new parcels. This technically would not be a change in use from the previous, but could result in impacts to soils from added earthwork, septic systems, traffic, etc.</p> <p>It is true that the US Department of Agriculture's 2012 Census of Agriculture for Clark County reported that the average size of farms increased from 2007 to 2012 (information available at http://www.agcensus.usda.gov/Publications/2012/Online_Resources/County_Profiles/Washington/cp53011.pdf).</p> <p>It is the opinion of the Clark County Board of County Councilors that the Preferred Alternative described in the FSEIS will meet the County's future growth needs. Thank you for your comments.</p>
001	Tim Trohimovich	9/10/15	4	<p>The SEIS must identify as the adverse impacts of development on landslide hazards the loss of property and human life Also on page 2-7, the Draft SEIS states: High landslide areas are found in all UGAs but mostly within the La Center and Ridgefield UGAs. Implementation of grading and building code requirements are typically sufficient to provide foundation design that can minimize any damage that may occur as a result of the presence of these hazards.</p> <p>However, the adverse impacts of most landslide hazards cannot be mitigated through foundation design, or really any form of mitigation other than avoidance.28 In fact, the Aldercrest-Banyon landslide of February 1998, in nearby Kelso, Washington, was the "[s]econd costliest landslide disaster in U.S. history[.]"29 After that landslide, the President approved a federal disaster declaration for the 138 homes damaged by the landslide. The damage "exceeded \$70 million, but the buyout for the houses was 30 cents on the dollar and totaled around \$30-\$40 million."30 Insurance typically does not cover landside damage.31 Now with the Oso tragedy the state had the deadliest landslide in United States history.32 So property owners will lose much of their investment in their homes even in the unlikely event of a federal buyout. And in the worst case they will lose their lives and the lives of their family members.33 So the Final SEIS must identify the potential loss of life and property as one of the potential adverse impacts of the proposed alternatives that allow construction on landslide hazards.</p>	<p>It is not anticipated that loss of property would result from development. To clarify that inappropriate construction within landslide hazard areas would not be allowed, the following text has been added in the FSEIS: "In areas where proposed development cannot meet the seismic code requirements, only passive uses (such as parks) will be allowed."</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
001	Tim Trohimovich	9/10/15	5	<p>The Draft SEIS in Section 3.3.2 on pages 3-3 to 3-15 does not adequately address the impacts of the proposed alternatives on surface and ground water resources and the identified mitigation is inadequate. The Clark County Coordinated Water System Plan Update: Regional Supplement, which was adopted after the 2007 comprehensive plan, will serve rural development outside of "rural centers" with private wells.³⁴ The Clark County Coordinated Water System Plan Update states that the rural areas "are not expected to accommodate large amounts of population growth."³⁵ The Clark County Coordinated Water System Plan Update should be identified on as one of the changes since page 2007 on page 3-3 of the Draft SEIS.</p> <p>Another change is that the Washington State Department of Ecology has determined that "[t]here is limited water available for new uses in WRIA 27" and "much of the water in the Lewis River Watershed has already been spoken for."³⁶ The situation is the same in the Salmon-Washougal Watershed. "There is limited water available for new uses ... " and "much of the water in this watershed has already been spoken for."³⁷ But the Draft SEIS does not disclose that there is very limited water in the two watersheds and does not analyze whether the new lots on rural and resource lands allowed by the four alternatives can be supported by this very limited water supply. When the Washington State Department of Ecology adopted the instream flow rules for the two watersheds, Ecology established reserves for future domestic uses.³⁸ But the Draft SEIS does not mention the reserves, does not disclose how much of the reserves remain, and does not disclose whether the remaining reserves can serve the lots that can be created under the four alternatives. This information and analysis must be included in the Final SEIS to comply with SEPA.³⁹</p> <p>There is already evidence that the overdevelopment of rural and resource lands has caused wells to run dry.⁴⁰ This impact is a serious environmental impact of the overdevelopment of rural and resource lands and is not mentioned in the Draft SEIS. This problem will be made worse by all of the new lots the four alternatives allow and the very limited water supplies in the two watersheds in Clark County. Again, this impact should have been analyzed and disclosed in the SEIS.⁴¹</p> <p>Allowing the continued subdivision of rural and resource lands without adequate water supplies will adversely impact property owners in two ways. First, it will adversely impact senior water rights holders whose wells go dry.</p> <p>Second, people will buy lots on rural and resource lands that do not have a legal and actual water supply. This will prevent them from being able to build on those lots or potentially subject them to curtailment during low water periods. Preventing these adverse environmental impacts is nothing but basic consumer protection.</p>	<p>Information regarding the Clark County Coordinated Water System Plan Update has been added to the FSEIS, including policies pertaining to rural development. Likewise, information from the Department of Ecology on available water supplies has been incorporated where available.</p> <p>Public services, including a viable water supply, must be available on a lot prior to the County authorizing a development permit. No development would be allowed on parcels that do not meet the minimum requirements for utilities and public services. Thank you for your comments.</p>
001	Tim Trohimovich	9/10/15	6	<p>The Draft SEIS, on page 3-15, identifies clustering as a mitigation measure that reduces the number of wells. But clustering will not reduce the demand for ground water, the same number of lots will require a similar amount of water at rural cluster densities. We suggest more effective mitigation. The growth planned for the rural and resource lands of Clark County should be consistent with the available water resources. New subdivisions and building permits should not be approved unless the applicant shows that they have adequate water supplies that meet drinking water standards and the legal right to use that water. These measures will mitigate impacts on surface and ground water.</p> <p>We believe that these failures to disclose and analyze the environmental impacts on surface and ground water violates the Washington State Environmental Policy Act. It is also the most serious deficiency of the SEIS.</p>	<p>Impacts to ground and surface water are discussed in Section 3.3 of the FSEIS. It is anticipated that cluster developments would improve groundwater conditions in that: (1) less land would be developed into fertilized lawns and landscapes; and (2) there would be less impervious surface cover, providing more open space for water infiltration. It is not anticipated that cluster development would reduce drinking water demand, but rather the reduction in number of wells required would reduce the potential for groundwater contamination. As stated in Section 3.4, any development projects that have the potential to impact water resources would be regulated by local critical area codes and state regulations governing water quality. New subdivisions and building permits would not be approved if the applicant could not prove there would be adequate water supplies and that the impacts to water resources would not be considerable.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
001	Tim Trohimovich	9/10/15	7	<p>The analysis in Section 4.1 Fish and Wildlife Habitats is well done and scientifically defensible, but some of the proposed mitigation measures are not. The analysis in Section 4.1 accurately and fairly summarizes the impacts on fish and wildlife of the alternatives. The Draft SEIS, on page 4-14, recommends as a mitigation measure for alternatives 2 or 4 to include requirements to cluster residential lots when considering applications for subdivisions. However, cluster subdivisions can actually encourage the urbanization of resource lands and rural areas because they create open space amenities that encourage the development of neighboring properties.⁴² So typically cluster subdivisions are not effective mitigation.</p> <p>Instead of ordinary clustering, we recommend the mitigation measures identified in the Washington State Department of Fish and Wildlife's Landscape Planning for Washington's Wildlife: Managing For Biodiversity In Developing Areas⁴³ and Land Use Planning for Salmon, Steelhead and Trout: A land use planner's guide to salmonid habitat protection and recovery.⁴⁴ Both of those reports include methodologies that can be incorporated into comprehensive planning and development review to protect fish and wildlife. Both of those reports are also enclosed with the paper original of this letter. Unfortunately, those measures are largely incompatible with Alternatives 2, 3, and, especially, 4.</p>	<p>The intention behind cluster development is to allow intensive use of suitable land in exchange for the preservation of critical areas and resource lands. Therefore, it is the explicit purpose of cluster development to disallow development on neighboring, environmentally-sensitive land outside of the cluster. The County understands your concern that additional development would be required to service the new subdivisions. Proper zoning would ensure that any additional commercial development would be planned for within the cluster and would not spring up unplanned.</p>
001	Tim Trohimovich	9/10/15	8	<p>Please clarify the statement on bottom of page 5-3 and the top of page 5-4 On pages 5-3 and 5-4, the Draft SEIS states:</p> <p>Alternatives 2 and 4 would likely have greater effects on transportation fuel consumption because of the potential for an increased number of new parcels in the resource zones. However with those new parcels there is optimism that resource production will be actualized.</p> <p>We agree with the first sentence quoted above, but do not understand the second sentence. If the second sentence means that adopting higher density zoning for forest and agricultural land will make it more likely that it will be used for forestry and agriculture, that is wrong as is documented starting on page 3 of this letter. Instead it will increase the conversion of those lands to other uses, most likely low density, poorly planned sprawl.</p> <p>On a related note, Alternatives 2 and 4 would likely have greater effects on transportation fuel consumption because of the potential for an increased number of new parcels in the rural zones too. Alternative 3, by expanding the La Center urban growth area for a school will also increase transportation fuel consumption. Travel and Environmental Implications of School Siting reported one of the first studies of the "relationship between school location, the built environment around schools, mode choices for trips to school, and air emissions impacts of those choices." ⁴⁵ The study found that:</p> <ol style="list-style-type: none"> 1. School proximity to students matters. Students with shorter walk and bike times to or from school are more likely to walk and bike. 2. The built environment influences travel choices. Students traveling through higher-quality environments are more likely to bicycle and walk. 3. Because of travel behavior differences, school location has an impact on air emissions. Centrally located schools that can be reached by walking and bicycling reduce air pollution. <p>The results suggest that actions to improve students' walking environments, and to support communities that wish to locate schools in neighborhoods, will result in increases in student walking and biking to school. Increased walking and biking can reduce emissions related to auto travel and improve environmental quality.⁴⁶</p>	<p>The intent of the second sentence was to express one potential outcome of Alternative 4. Alternative 4 is no longer being considered. It is possible that creating smaller, more affordable parcels in the resource zones could encourage an increase in small-scale resource production operations. It is impossible to predict the likelihood or to what extent this might happen as it is greatly dependent upon market factors.</p> <p>The 17-acre UGA expansion proposed by the City of La Center for a new school facility abuts the existing city limits. This area is also immediately adjacent to residential zones. The proposed UGA expansion area is within walking distance of the adjacent residential neighborhoods.</p> <p>Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.</p>
001	Tim Trohimovich	9/10/15	9	<p>Please correct statements on natural resource production impacts The Draft SEIS on page 5-5 claims that "Alternative 4 would not likely have significant impacts on energy use and natural resource production." But as was documented beginning on page 3, Alternative 4 will have a significant effect on agricultural production long-term and perhaps even forest products production. Localized impacts will be significant.</p>	<p>Alternative 4 is no longer being considered. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.</p>

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
001	Tim Trohimovich	9/10/15	10	Further, on page 5-6 the Draft SEIS claims that mitigation would minimize the impacts of the alternatives. But no mitigation is proposed for paving over farmland or forest land as Alternatives 2, 3, and 4 specifically allow. The transportation impacts of Alternatives 2 and 4 are not going to be addressed effectively by transit, for example, given their low densities and remote locations. The statement that mitigation would minimize the impacts of the alternatives should be retracted in the Final SEIS.	The purpose of mitigation is to avoid, reduce or minimize unwanted impacts and enhance beneficial impacts. All mitigation measures proposed in the SEIS have the potential to minimize the impacts of the alternatives to varying degrees. It is true that mitigation measures do not always negate adverse impacts of the alternatives in equal measure. The purpose of identifying mitigation measures at this programmatic level is to identify which alternatives are more suitable for mitigation measures and would, if said measures are adopted, have fewer impacts than the other alternatives proposed. Additional information on transportation has been added to Chapter 7 of the FSEIS.
001	Tim Trohimovich	9/10/15	11	Alternative 2's and 4's single "Rural Lands designation"violates the Growth Management Act The Growth Management Act requires and the Washington State Supreme Court has held that the rural element of the comprehensive plan must include a variety of rural densities. ⁴⁷ In Kittitas County v. Eastern Washington Growth Management Hearings Board, the Kittitas County Comprehensive Plan had a single rural comprehensive plan designation similar to what as Alternatives 2 and 4 propose. The Limited Areas of More Intense Rural Development also had separate comprehensive plan designations. The county argued that the reference in the comprehensive plan to "zoning regulations that have included six possible designations (with three possible densities) and innovative zoning techniques" complied with the Growth Management Act requirement for a variety of rural densities. ⁴⁸ Based on the plain language of the Growth Management Act, the Washington State Supreme Court held that the comprehensive plan itself must include a variety of rural densities and the Kittitas County Comprehensive Plan violated this requirement. ⁴⁹ The Washington State Supreme Court identified a practical reason for this requirement: *40 We also note a practical concern raised by RIDGE and CTED. They argue that reading the GMA to not require that the Plan itself provide for a variety of rural densities will result in the evasion of GMA requirements through site-specific rezones. This is not the first time this court has recognized this potential problem. See Woods v. Kittitas County, 162 Wn. 2d 597, 629-32, 174 P.3d 25 (2007) (Becker, J., concurring). Because interested parties cannot raise GMA compliance issues in Land Use Petition Act (chapter 36.70C RCW) petitions, id. at 616, 174 P.3d 25 (majority opinion), site-specific rezones are only evaluated for compliance with the GMA through evaluation of their consistency with the existing Plan. A comprehensive plan that is silent on the provision of a variety of rural densities (and other protective measures for rural areas) effectively allows rezones that circumvent the GMA. This argument may prove too much, as rezones must also comply with development regulations, which can be challenged for compliance with the GMA. Id. at 615-16, 174 P.3d 25. However, in Woods, the petitioner's land was designated at one dwelling unit per 20 acres, and the County later approved a 3-acre rezone after it was too late for her to challenge the development regulations for compliance with the GMA. Id. at 629-30, 174 P.3d 25 (Becker, J., concurring) ("The rezone was the first and only time that the actual change of density on the subject site could have been challenged ... as violating the GMA."); RCW 36.70A.290(2) (stating that petitions challenging a comprehensive plan or development regulation as noncompliant with the GMA "must be filed within sixty days after publication"). While we decide this question on the basis of the plain statutory language, we recognize that reading out the requirement that counties include certain protections in the Plan itself, including to provide for a variety of rural densities, could result in the evasion of GMA requirements through site-specific rezoning. ⁵⁰ Alternatives 2 and 4 propose a single rural comprehensive plan designation, just like Kittitas County. Like Kittitas County, that violates the Growth Management Act. This violation should be disclosed in an appropriate part of Section 6 Land and Shoreline Use in the SEIS. The Draft SEIS does not disclose that including in the urban growth area land that meets the requirements for agricultural lands of long-term commercial significance violates the Growth Management Act. The SEIS should include this important decision for decision makers. The Draft SEIS, on page 6-19, describes a proposal to include 111 acres of agricultural land of long-term commercial significance on the north side of the City of Ridgefield in the Ridgefield urban growth area. The Draft SEIS does not document that this land no longer meets the definition of agricultural lands of long-term commercial significance nor does it disclose that including land that continues to meeting the criteria for agricultural land of long-term commercial significance in an urban growth area violates the Growth Management Act. ⁵¹ These disclosures should be included in the SEIS.	The Clark County BOCC has determined that the rural land use designation proposed in the Preferred Alternative meets the County's needs at this time. The final Comprehensive Plan update will undergo review by the Department of Commerce for GMA compliance. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
001	Tim Trohimovich	9/10/15	12	Farm and forest land saves taxpayers money The Draft SEIS identifies the difficulty of providing the transportation and public facilities and services to pay for several of the alternatives. One way of saving taxpayers and ratepayers money is to conserve farm and forest land. Farm and forest land pays more in taxes than it requires in public services. In contrast, when farm or forest land is paved over for housing, the housing pays less in taxes than it requires in public services. ⁵² For every dollar farm or forest land pays in taxes it only requires 35 cents in public services. For every dollar residential development pays in taxes, it requires \$1.16 in public services. ⁵³	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
001	Tim Trohimovich	9/10/15	13	We recommend that Alternative 1: No Action be identified as the preferred alternative because it meets community needs The Population and Jobs Projections - Issue Paper 2 shows that Alternative 1 meets the community's needs for land for housing and jobs. 54 Because it will result in the most compact urban growth areas, it will also help bring Clark County, its cities, its taxpayers, and its residents the benefits of compact urban growth areas while protecting working farms and forests.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
001	Tim Trohimovich	9/10/15	14	Alternative 1 will save taxpayers and ratepayers money The Growth Management Act (GMA) requires urban growth areas and limits their size for many reasons. One of the most important is that compact urban growth areas (UGAs) save taxpayers and ratepayers money. In a study published in a peer reviewed journal, John Carruthers and Gudmaundur Ulfarsson analyzed urban areas throughout the United States including Clark County. 55 They found that the per capita costs of most public services declined with density and increased where urban areas were large.56 Compact urban growth areas save taxpayers and ratepayers money. This study was published in a peer reviewed journal.57	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
001	Tim Trohimovich	9/10/15	15	Alternative 1 will encourage housing growth in cities and towns, protect rural and resource lands, and help make healthy local food available for Clark County residents Urban growth areas work to encourage development in urban areas and protect farms and forests. For example, to examine the effect of Washington's urban growth areas on the timing of land development, Cunningham looked at real property data, property sales data, and geographic information systems (GIS) data. These records include 500,000 home sales and 163,000 parcels that had the potential to be developed from 1984 through 2001.58 Cunningham concluded that "[t]his paper presents compelling evidence that the enactment of a growth boundary reduced development in designated rural areas and increased construction in urban areas, which suggests that the Growth Management Act is achieving its intended effect of concentrating housing growth. "59 He also concluded that by removing uncertainty as to the highest and best use of the land that it accelerated housing development in King County.60 This study was published in a peer reviewed journal.61 Reducing development in rural areas and natural resource lands can also have significant environmental benefits, such as protecting water quality and working farms and forests. For example, Lin Robinson, Joshua P. Newell, and John M. Marzluff compared geo-referenced aerial photos and building permit data to determine land use changes on the fringe of the King County urban growth along 1-90 east of Seattle. This area includes suburban cities, rural areas, and natural resource lands. 62 They concluded that King County's urban growth areas were accommodating growth and the designated agricultural lands and forest lands of long-term commercial significance were being maintained as farm and forest land.63	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
001	Tim Trohimovich	9/10/15	16	One of the most controversial issues related to urban growth areas is whether the restricted land supply causes increases in housing costs. Carruthers, in another peer reviewed study, examined the evidence for the Portland urban growth area and concluded that it was not increasing housing costs because the city's high density zoning allowed the construction of an abundant housing supply. 64	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
001	Tim Trohimovich	9/10/15	17	Alternative 1 will help keep our existing cities and towns vibrant and economically desirable In a peer reviewed study, Dawkins and Nelson found that the city of Yakima's share of the metropolitan housing market increased after adoption of the GMA.65 This and other measures showed that center cities in states with growth management laws attract greater shares of the metropolitan area's housing market than center cities in states without growth management aiding center city revitalization.66 This reduces the tendency to move out of existing center cities.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
001	Tim Trohimovich	9/10/15	18	Alternative 1 will help promote healthy lifestyles Aytur, Rodriguez, Evenson, and Catellier conducted a statistical analysis of leisure and transportation-related physical activity in 63 large metropolitan statistical areas, including Seattle, Tacoma, and Spokane from 1990 to 2002.67 Their peer reviewed study found a positive association between residents' leisure time physical activity and walking and bicycling to work and "strong" urban containment policies such as those in Washington State.68 This article was published in a peer reviewed scientific journal.69	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
002	Tim Trohimovich	9/16/15	1	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. 1 So the SEIS should identify these GMA violations as disadvantages of Alternative 3.	The County has taken your comments into consideration; however, the BOCC voted to include the Ridgefield UGA expansion in the Preferred Alternative at this time. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
002	Tim Trohimovich	9/16/15	2	Ridgefield urban growth area expansion violates the GMA because the agricultural comprehensive plan de-designation does not take an areawide approach In Futurewise v. Benton County, the Growth Management Hearings Board reversed a county de-designation of agricultural lands of long-term commercial significance to put the land in an urban growth area.2 The Board wrote: The Board considers Benton County's de-designation of agricultural lands for this small section of land, in isolation from a much larger County or area-wide study to be inappropriate and, by de-designating lands that qualify as agricultural lands of long term commercial significance, the County violated WAC 365-190-050 and corresponding GMA sections RCW 36.70A.030, RCW 36.70A.050, and RCW 36.70A.170.3 Like 1,263 acres de-designated in Futurewise v. Benton County, the 111 acres that is proposed to be dedesignated and included in the Ridgefield UGA is part of a larger area. The excerpt from the County/UGA Comprehensive Plan Clark County, Washington shown below documents that the Agriculture designation runs from Ridgefield north to north of La Center. So just considering the dedesignation on the 111 acres violates WAC 365-190-050 and corresponding GMA sections just as the land dedesignated in Futurewise v. Benton County did. The comprehensive plan map legend and the map follow on page 3 below. The Ridgefield urban growth area expansion violates the GMA because the property meets 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. 4 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. "5 Natural resource lands must be conserved.6 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,	The County has taken your comments into consideration; however, the Board of County Councilors voted to include the Ridgefield UGA expansion in the Preferred Alternative at this time.
002	Tim Trohimovich	9/16/15	3	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."45 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.46 So expanding the Ridgefield UGA violates the GMA.	The County has taken your comments into consideration; however, the Board of County Councilors voted to include the Ridgefield UGA expansion in the Preferred Alternative at this time.
002	Tim Trohimovich	9/16/15	4	The Final SEIS should summarize the evidence included with this letter and state that the Ridgefield UGA expansion contains the three GMA violations.	Thank you for your comment.
002	Tim Trohimovich	9/16/15	5	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.47 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. "48	Thank you for your comment.
054	Tom York	9/14/15	1	My wife my son and I live on a twenty acre piece of property just north of Daybreak county park. We think that the only alternative for growth that makes any sense is: alternative 1.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
054	Tom York	9/14/15	2	splitting north Clark county into small pieces would ruin what myself and many others call "Rural Life". If it were all split up, it wouldn't be rural anymore. It would be a traffic jam. I already get that in town. It is nice to go home away from traffic jams.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
054	Tom York	9/14/15	3	Who is going to pay for the huge road improvements needed to do all that development. Heck, I live right up the street from Tom Mielke and we don't even have lines on that county road. I guess infrastructure isn't on the councilors agenda.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
054	Tom York	9/14/15	4	what about farms in north Clark county? My property for example would be split up whether I want it to be or not. Therefore, creating more taxes for my family and myself.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
054	Tom York	9/14/15	5	I have worked in the construction industry my entire life. I have seen Clark county turn into a comfortable relaxing area into a unplanned sprawling developers playground. This kind of pattern will just create a million tiny lots with millions of cars everywhere.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
054	Tom York	9/14/15	6	Oh, and of course, everybody going to Portland for a job. Everybody who lives here knows that there isn't any family wage earning jobs in Clark county. Farms, especially vineyards are starting here in Clark county all over the place. Do you really think a 1 acre vineyard will every make much wine? What you are proposing is totally thought out for a very few people. I can think of two in particular: Mrs. Rasmussen and Mrs. Levanan. Alternative four is totally unsustainable for farmers.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
054	Tom York	9/14/15	7	How about all the septic systems that will be needed for alternative four. A lot of north Clark county is very at and does not perk due to high clay in the soil. How is that going to work? Community drainfields? Guess what, I live right next to a community drainfield and it floods my property every winter illegally. The county somehow made that legal however. I guess I could go on and on with so many issues that Clark county will run into by following any alternative other than 1 but I think the county officials are smart enough to figure that out for themselves.	All proposed development under any of the alternatives would be subject to the existing development standards and Department of Health regulations for septic systems. Each development proposal would be evaluated on a site-by-site basis to determine whether it would meet the regulations and what mitigation would be required, prior to issuing any permits.
054	Tom York	9/14/15	8	I hope that the current councilors read this and go with alternative 1 because it is the only one that makes any sense.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
044	Tracy Maguire	9/2/15	1	I'm writing to express my support for Alternative 1 and express my deep opposition to Alternatives 2 and 4.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
044	Tracy Maguire	9/2/15	2	As a transplant from California, I have been directly effected by the economic consequences of allowing urban sprawl to take over rural areas. We need to stop the short sighted urban growth and maintain Clark Counties rural farming land for future generations and smart planning options.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
031	Val Alexander	9/10/15	1	<p>I am a rural resident of Clark County. I own 65 acres, much of which is timberland. I have been raising organic vegetables and fruits for many years, selling produce in the farmers' markets and directly from the farm. I have 4 wells on the property. One puts out an adequate supply of water for my food production for now, one has dried up completely, 1 is very marginal, meaning they run out of water easily, and one is adequate for residential use.</p> <p>Although I own many acres, only 4 are suitable for food production. Food production requires relatively flat land, electricity available for processing, roads for harvest and transport, and sunlight. Soil is also a major factor, but modern agriculture can amend many soils by means of organic compost and cover crops.</p> <p>As most people realize, ample water is essential for food production here. Farmers cannot afford to buy water from a utility and expect to remain in business very long. Their well water is essential. Many studies reveal that the water table in Clark County is very limited. Here is a statement from Focus on Water Availability Lewis River Watershed, WRIA 27 p. 1 (Publication Number: 11-11-031August2012) accessed on Nov. 12, 2014 at: https://fortress.wa.gov/ecy.Lpublications/summao/pages/1111031.html:</p> <p>The attached is a cross section of the aquifers that Clark County residents use for their water sources, available at http://www.clarkpublicutilities.com/clarkpublicutilities/assets/File/crossSection2008.pdf</p> <p>I'm concerned that this is not being given adequate consideration when the county is planning to add more residential lots to rural areas. I heard one argument submitted by Carol Levanen, of Clark County Citizens United, that water availability is not an issue in Clark County since "PUD supplies 93% of water to county residents already. I have looked into this matter since it didn't seem to ring true to me. The figures I have gathered indicate that Clark PUD supplies water to about 18% of Clark County Residents. Here is my information:</p> <p>Clark Public Utilities has 185,000 meters in Clark County. We can assume that that means approximately the amount of residences and businesses that use electricity. They supply water to 33,000 customers. Adding up water supplied by the cities, Washougal, 5000, Camas, 7,652, Ridgefield, 2081, Battleground, 5500, La Center, 1014, and Vancouver, 68,000, that comes to 122,247 on public water systems. The remaining 62,753 must be private wells. It's those private wells that will be in jeopardy if the county allows as many as 10,000 more wells to rural areas. Who will be responsible when the wells start to go dry? How will farmers grow food for our community?</p> <p>Water availability is certainly the most important problem that adding more home sites to rural Clark County will bring. I've also heard Clark County Citizens United claim that Clark PUD will supply water hookups free for residents in need of water. That too is incorrect. Here are the current fees for hookup:</p> <p>The DSEIS does not address the water issues in any depth, in spite of the fact that water is an essential need. Nor does it discuss septic issues, also essential for protection of our ground water supply.</p>	Additional information regarding water quality and water supply has been added to Chapters 3 and 8 of the FSEIS, including information from the Washington State Department of Ecology and Clark County Public Utilities.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
031	Val Alexander	9/10/15	2	The DSEIS does not address the potential number of additional road trips that will occur under Alts. 2 and 4 nor does it examine the effects of stormwater from additional rural homesites that will affect rivers and streams or the impacts on resource lands. As a board member of Friends of the East Fork, I am extremely concerned about the health of our rivers, especially the East Fork Lewis River.	Please see Chapter 1 of the FSEIS for a description of the BOCC-adopted Preferred Alternative. The traffic analysis conducted for this programmatic SEIS relied on population growth projections and regional transportation modeling information. The potential number of additional vehicle trips is not available at this time. Additional information has been added to Chapter 7 Transportation of the FSEIS on planned projects and potential deficiencies in the transportation network. For the purposes of this programmatic EIS, it is sufficient to state that alternatives that increase impermeable surface area will result in more stormwater, which is done in this SEIS. The full extent of stormwater development will be identified as development of subsequent projects occurs. As stated in Section 3.1.2, Clark County has regulations in place to protect water quality. The County recently updated its Stormwater Manual and development codes. For non-exempt activities, the codes generally require applicants to prepare a stormwater management plan, implement best management practices to protect water quality during construction, and install detention and water quality treatment for stormwater runoff.
031	Val Alexander	9/10/15	3	Poor county road maintenance is another ... already many roads are not wide enough to stripe so that residents can see the center line in winter months.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
031	Val Alexander	9/10/15	4	Alternatives 2 and 4 are violating the terms of the Growth Management Plan and will be challenged if adopted, thus adding a huge financial burden to the taxpayers of Clark County. We deserve better.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
031	Val Alexander	9/10/15	5	The schools, especially in Battle Ground, are already stretched to their limits with added students, with no plans to house the new influx of children. The Columbian ran an article about that: http://www.columbian.com/news/2014/nov/17/crowdedclassrooms-growing-battle-ground-district/	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
031	Val Alexander	9/10/15	6	Tim Trohimovich of Futurewise has submitted a letter explaining many other reasons for limiting rural expansion. I hope you will take his advice seriously and choose to stay with Alternative 1 - no action.	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
030	Valerie Alexander	9/17/15	1	here are some examples of land for sale in the area in case some of the CCCU members want to buy some for their offspring.	Thank you for your comment.
020	Vicky Ridge-Cooney	9/17/15	1	Alt 1 protects the taxpayers and environment of Clark County. Projected growth can be accommodated within the existing urban growth boundaries.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
020	Vicky Ridge-Cooney	9/17/15	2	Other alternatives will lead to increased urban sprawl and expensive impacts to police, fire, transportation, and education. As pointed out in the draft EIS, increasing the area of urban development leads to degradation of water quality and fish and wildlife habitat. I predict that adopting Alt ould lead to expensive appeals and lawsuits under the Growth Management Act. Please, Clark County decision makers use our money wisely.	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
177	Warren Neth	9/2/15	1	<p>Monday Night's "Land Use Forum" was recorded and is available here: https://youtu.be/ZeYiwbl77fU</p> <p>The forum had an excellent turnout and I believe the panel provided some rich information for your consideration as you develop the Preferred Alternative. As you may have seen, Slow Food Southwest Washington hosted an afterparty at Angst Gallery. It was a Clark County Grown chef collaborative. As I worked to connect chefs with farmers for the dinner, the level of concern from farmers is astonishing. Their is a sense from the farming community that you three councilors feel agriculture is dead and will be pushing through ALT 2 and 4 without any amendment. As you can hear from our farmer on the panel, Sue Marshal, the implications of losing AG-20, intense parcelization right down the road from her farm and misuse of the clustering zoning, coupling that with no apparent effort to conserve economically viable farms in your Comprehensive Plan update efforts will put pressures on their families multi-generational farm that is having them question the future of their farming in Clark County.</p> <p>On the tour of mid-sized farms that Councilor David Madore joined, I was able to show him a brief glimpse of economically viable farms that still exist in Clark County. I put together a list of Key Takeaways and Next Step Requests that I wanted to once again share with you.</p>	Thank you for your comment. Please see Chapter 1 of the FSEIS for a full description of the BOCC-adopted Preferred Alternative.
177	Warren Neth	9/2/15	2	<ul style="list-style-type: none"> • We spoke with berry growers that have 100-400 acres in production. A majority of those farmers lease their land, most of which is AG-20. Alternative 4 of the Comprehensive Plan removes the AG-20 zoning, so all properties in that zone, would turn into two AG-10 lots or even AG-5. Once upzoned, the landowner of that leased land could be motivated to subdivide the lots and sell residential lots that would be less likely to lease as AG land. • We spoke with farmers that are working AG-20 parcels, that have smaller residential lots around them, while Right-to-Farm policy's in the county provide some level of protection, they still get neighbor complaints for the dust when tilling the field, when they apply spray, when they get mud on the road from tractors, when loud farm machinery starts up before sunrise or many other farm related activities. We have a small opportunity to identify Agricultural Production Districts where we can focus farmland conservation funding, keep AG-20 and minimize the conflict of interest between residential and mid-sized farms. • We visited April Joy Farm, who farms 25 acres, pays two full-time farm workers, has an integrated farming system that rotates pasture raised animals and annual crops, plus grows soil fertility on-site with cover crops and collect the manure from the pasture raised animals. The farm has CSA members, sells directly to restaurants and brings Fruit Valley elementary school out to grow potatoes. April Joy Farm is the type of farm that would work well in areas that currently have neighboring residential, they are also dependent on having at least 20 acres to pay their wages and rotate their integrated field management. • We drove through Jones Berry Farm, that is near the Ridgefield Junction and in the Pioneer Irrigation District. Their family has been farming that land for many generations and would like to continue the tradition. Having generational farming families working land in an already established Irrigation District is great foundation for an Agricultural Production District, that the county could direct Purchase of Development Rights funds from the Legacy Lands program toward. • We toured Gouger Cellars Winery and heard his proposal for a vineyard incubator, and the potential growth of the Clark County wine industry and how that would effect our regions desirability for locating major employers. • After decades of intense centralization and scaling-up of our nations food system, there is a growing trend to re-strengthen a network of regional mid-sized farmers. The trend is a result of disease outbreaks in mega farms raising meat and eggs and the drought facing our Nations bread basket, California's Central Valley. Clark County needs to do its part in supporting mid-sized producers to cultivate the amazing soils and climate Clark County provides. Amanda Osborne from Ecotrust joined the tour and has recently finished a year long report, Oregon Food Infrastructure Gap Analysis (www.ecotrust.org/publication/regional-foodinfrastructure/). The report shows the infrastructure gaps in the regional farm economy, which is great information to inform an economic development plan for Clark County's Ag sector. 	The Preferred Alternative would replace AG-20 with AG-10; however, this change does not automatically change the actual parcel size. Individual parcels would only be subdivided if the owner chooses to do so and applies with Clark County. Your comment has been reviewed and considered during the development of the FSEIS.
177	Warren Neth	9/2/15	3	<p>Slow Food Southwest Washington next step requests:</p> <ol style="list-style-type: none"> 1. Hold a BOCCC Work Session on Farmland Conservation tools and invite WA Farm Bureau, WA office for farmland preservation, Clark County Food System Council, Clark County Citizens United, Columbia Land Trust and American Farmland Trust. 2. Have Community Planning develop a White Paper on Transfer of Development Rights. 3. Ask Clark County Planning Commission develop a proposal for Agricultural Production Districts. 4. Ask that WSU Extension and CREDC analyze Oregon Food Infrastructure Gap Analysis and collaborate to develop an economic development strategy to encourage mid-sized farms and farm to institution partnerships. 5. Ask Legacy Lands program to identify properties that have agricultural and habitat benefits. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.
177	Warren Neth	9/2/15	4	<ol style="list-style-type: none"> 6. Identify Agricultural Production Districts before creating the 2016 Preferred Alternative and do not upzone AG-20 into AG-10 in those zones. 7. Analyze ALT 4's R-1 and R-2.5 impact on conceptual Agricultural Production Districts. 	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

Clark County Draft SEIS Comment-Response Record (8/15/15 - 9/17/15)

Letter ID	Name	Date	Comment Number	Comment	Response
177	Warren Neth	8/26/15	5	<p>The Clark County Food System Council would like to invite the Board of Clark County Councilors to join next weeks Land Use Forum. As you can see below, we have compiled an excellent speaker line up that we hope can inform citizens about issues that the SEIS has raised.</p> <p>What: Land Use Forum: Food, water, jobs and litigation in the Comprehensive Plan Update Process When: August 31, 2015; 6 to 8 p.m. Where: Downtown Vancouver Library, Columbia Room, 901 C St Vancouver, WA RSVP: https://www.facebook.com/events/974473079283670/ Hosted by Clark County Food System Council, the goal of the event is to review the Draft Supplemental Environmental Impact Statement (SEIS) as a community and provide opportunities for participation in the development of the Preferred Alternative for the Comprehensive Plan. We will have speakers focusing on four topics: , food, jobs, water resources and litigation. After the presentations, we will move to an "open house" format where community and public sector entities will have tables and provide information about their organizations and positions on the alternatives of the Comprehensive Plan. Attendees will have opportunities to write and submit their comment on the alternatives.</p> <p>Schedule: 6-7:15 Presenters and questions 7: 15-8 Open House - Community and public sector entities will have tables and representatives to discuss their requests for the Comprehensive Plan update. An after-party at Niche Wine Bar, 1013 Main St, Vancouver, WA, will be hosted by Slow Food Southwest Washington. Small plates highlighting Clark County Grown ingredients will be prepared by Chefs from Niche Wine Bar and Fuel Bistro. Food will be served 7:30 - 9:30.</p> <p>Presenter and topics: - Food Security - Marshall, Bours Corner Farm, Farmer -Water Resources- Mike Gallagher, Southwest Regional Manager, Department of Ecology -Jobs and the economy- Mike Bomar, President, Columbia River Economic Development Council -Litigation and the impact on the taxpayer Tim Trohimovich, Director of Planning & Law, Futurewise</p>	Thank you for your comment. It has been reviewed and considered during the development of the FSEIS.

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**Appendix B. Issue Paper 7 Preferred Alternative
Urban VBLM and Rural Capacity Estimates**

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Clark County Comprehensive Plan 2016 Update

Planning for growth 2015 – 2035

Preferred Alternative –Urban VBLM and Rural Capacity Estimates – Issue Paper 7

Purpose

The purpose of this issue paper is to ensure there is sufficient capacity to accommodate the projected 20-year population and employment growth in the Preferred Alternative under SEPA as selected by the Board of County Councilors on February 23, 2016.

Background

In July 2013, Clark County began the process of updating its Comprehensive Growth Management Plan to meet the 2016 periodic update requirement of Chapter 36.70A.140 RCW. Several issue papers have already been prepared to allow the Board to make decisions about the update:

- Issue Paper 1 - Comprehensive Plan Overview: A summary of the county's Planning Assumptions, 2013 vacant and buildable lands model (VBLM) inventory and population and employment projections.
- Issue Paper 2 – Population and Job Projections: Background information for a discussion with the cities and the town of Yacolt on population and job planning assumptions for 2015-2035. On Jan. 21, 2014, the Board adopted the state Office of Financial Management's (OFM) medium population projection of 562,207 for the 20-year period ending 2035 (Res. 2014-01-09).
- Issue Paper 3 – Employment forecast based on input from Washington Employment Security Department (ESD). It was revised as Issue Paper 3.1 to include the 2014 VBLM information. On April 29, 2014, the Board adopted the high employment forecast of 91,200 net new jobs for the 20-year period ending 2035 (Res. 2014-04-01).
- Issue Paper 4 – Population and Job Allocation: On June 24, 2014, the Board identified the methodology for allocating growth by UGA and adopted preliminary allocations for initial review (Res. 2014-06-17). It was revised as Issue Paper 4.1 to reflect the additional capacity for population and jobs not captured by the vacant land model and presented at a BOCC Worksession on September 24, 2014. Following the 2015 assessor's population update, the issue paper was revised as Issue Paper 4.2. (Res. 2015-04-05).
- Issue Paper 5 – SEPA Scoping: On July 16, 2014, the Board discussed the environmental impact review process under the State Environmental Policy Act (SEPA) and directed staff to proceed to scoping on development of alternatives.
- Issue Paper 5.1 – SEPA provides a partial list of what has transpired from July 17, 2014 through March 11, 2015 and discussed four potential alternatives for study under SEPA. (Res. 2015-04-06).
- Issue Paper 6 CWPP – Discussed the role of the Countywide Planning Policies and introduced a proposed amendment procedure for updating countywide planning policies.

Methodology

The Geographic Information System (GIS) department ran the vacant buildable lands model and rural capacity estimate on the Preferred Alternative Plan map selected by the Board of County Councilors on February 23, 2016. Exhibit 1 vacant buildable lands model and Exhibit 2 rural capacity analysis provide the methodologies used and the data output.

The summary results of the VBLM capacity analysis in Table 2 indicate that in aggregate, Clark County can accommodate population growth of 135,122 and is sufficient to accommodate the 20-year projected population growth of 128,586 as identified in Table 1 Population Allocation.

The VBLM indicates that the cities of La Center and Ridgefield do not have sufficient capacity to accommodate their respective growth allocation. However, the VBLM does not reflect site specific planned redevelopment improvements. Each city reviews the VBLM data and provides the county with site specific additional population capacity overrides based on future planned growth. For example, the Vancouver waterfront redevelopment potential is not captured in the VBLM. Site specific overrides have been recognized by the county to more accurately reflect development potential. When the overrides are factored in, each jurisdiction has sufficient capacity to accommodate the projected 20-year projected population growth.

The rural area is allocated 10% of the total county growth which would be 12,859. (128,586 * 10%) The 2015 rural capacity estimate indicates the rural area can accommodate an additional 21,343 persons.

Table 1 Population Allocation

UGA	January 1, 2015 Population Estimates	2015 to 2035 VBLM Population Allocation	Additional Allocation	Total Allocation	2035 Estimates (Jan. 1, 2015 Pop. Est + Total Allocation)
Battle Ground	20,871	15,972	1,600	17,572	38,443
Camas	22,843	11,255		11,255	34,098
County	62,205	12,859		12,859	75,064
LaCenter	3,209	3,233	1,200	4,433	7,642
Ridgefield	6,575	13,087	5,832	18,919	25,494
Vancouver	315,460	52,786	3,815	56,601	372,061
Washougal	15,932	6,023	392	6,415	22,347
Woodland	89	229		229	318
Yacolt	1,661	303		303	1,964
Total	448,845	115,747	12,839	128,586	577,431

Note: This table reflects the revised information in Resolution 2016-03-01. The additional allocation column reflects the cities request to be made whole for the planning done in 2007 and to reflect site specific overrides to the VBLM. In order to stay within the 2035 population projection the Vancouver UGA additional allocation was reduced by 2,385.

Table 2 VBLM Capacity

UGA	January 1, 2015 Population Estimates	VBLM Preferred Alt. 2016 Population Capacity
Battle Ground	20,871	17,845
Camas	22,843	13,832
County	62,205	NA
LaCenter	3,209	3,941
Ridgefield	6,575	16,542
Vancouver	315,460	74,724
Washougal	15,932	7,501
Woodland	89	468
Yacolt	1,661	269
Total	448,845	135,122

*Rural Capacity is estimated at 21,343.

Table 3 below shows the VBLM Preferred Alternative 2016 employment capacity which includes additional land requested by the cities of Battle Ground, La Center and Ridgefield. The county has capacity for 75,847 net new jobs. The existing assumptions of total potential jobs not captured by the vacant lands model increase the employment capacity by 16,775 jobs for redevelopment and 7,400 public sector jobs, thus increasing the total potential job capacity from 75,847 to 100,022.

Table 3 VBLM Employment Capacity

UGA	VBLM Preferred Alt. 2016 Employment Capacity
Battle Ground	10,060
Camas	10,965
La Center	2,052
Ridgefield	8,780
Vancouver	39,496
Washougal	4,026
Woodland	0
Yacolt	468
Total	75,847
Total w/redevelopment and public employment	100,022

NEXT STEPS

This data will be provided to Environmental Science Associates (ESA) for inclusion in the Final Supplemental Environmental Impact Statement (FSEIS). County staff are working to update the comprehensive plan policies and text, Title 40 Clark County code, the Capital Facilities Plan, and the Capital Facilities Financial Plan, consistent with the Preferred Alternative 2016.

Vacant Buildable Lands Model

The Vacant Buildable Lands Model (VBLM) is a planning tool developed to analyze residential, commercial, and industrial lands within urban growth areas. The model serves as a tool for evaluating urban area alternatives during Clark County 20-year Comprehensive Growth Management Plan updates and for monitoring growth patterns during interim periods. The VBLM analyzes potential residential and employment capacity of each urban growth area within the county based on vacant and underutilized land classifications. This potential capacity is used to determine the amount of urban land needed to accommodate projected population and job growth for the next 20 years during plan updates and to analyze land consumption or conversion rates on an annual basis for plan monitoring purposes.

In 1992, Clark County began evaluating vacant lands as part of the initial 20-year growth management plan. At that time, County staff met with interested parties from development and environmental communities to examine criteria and establish a methodology for computing potential land supply available for development. A methodology relying on the Clark County Assessor's database and Geographic Information System (GIS) as primary data sources was developed. As a result the VBLM is a GIS based model built on geoprocessing scripts.

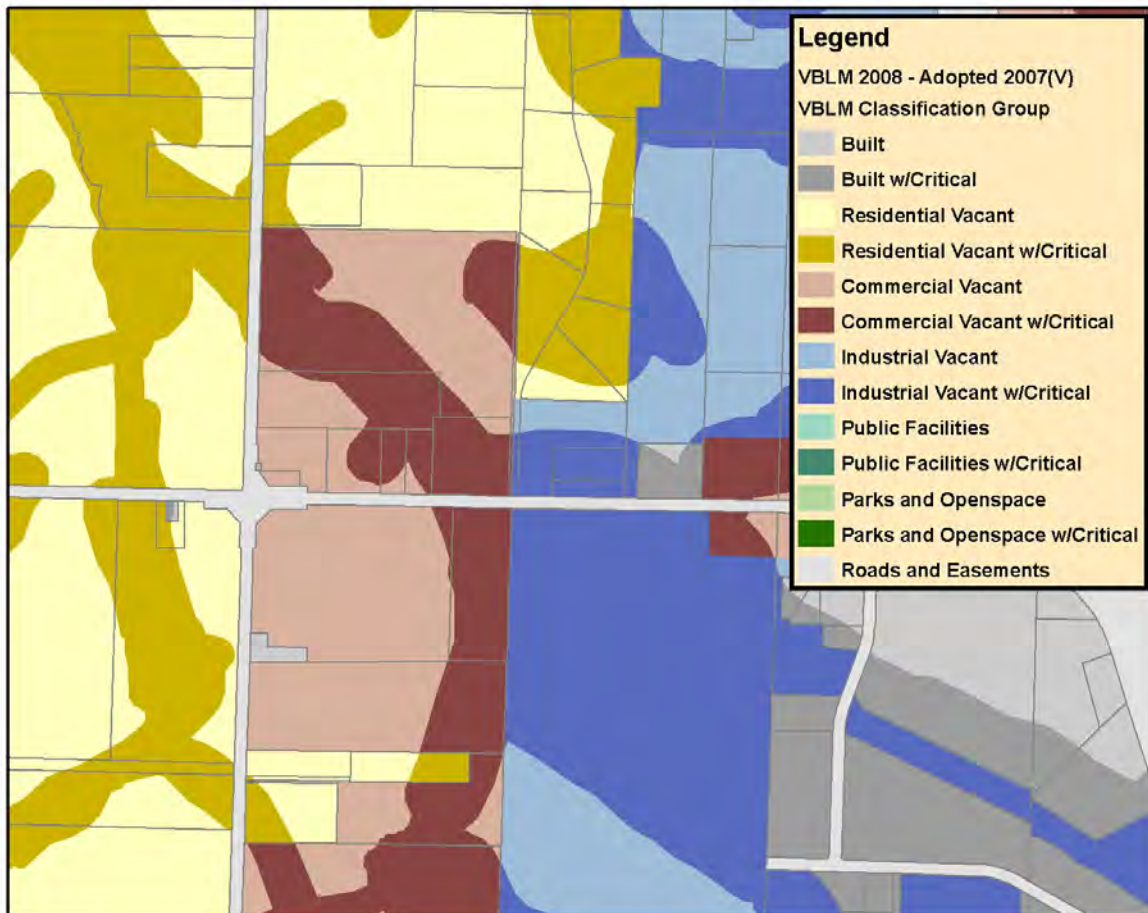
In the spring of 2000, the Board of Clark County Commissioners appointed a technical advisory committee consisting of local government agencies, Responsible Growth Forum members, and Friends of Clark County to revisit this process. They reviewed definitions for each classification of land and planning assumptions for determining potential housing units and employment.

Another comprehensive review of the VBLM criteria and assumptions was undertaken in 2006 as part of the growth management plan update. This review compared the 1996 prediction to the 2006 model. This review demonstrated that for the most part the model was a good predictor of what land would develop. However, changes were made to the model based on results of this review. Important changes to the model include:

- Underutilized land determination for all models was changed to a building value per acre criteria.
- The industrial model and commercial model now have consistent classifications. The industrial model was revised to match the commercial process.
- Environmental constraints methodology changed from applying assumptions to parcels based on percentage of critical land to simply

identifying constrained and non constrained land by parcel and applying higher deductions to constrained lands.

Example Map of Constrained Lands



Benefits of the current improvements are more consistency and easier monitoring of the model. Better accounting for private open space, constrained lands, and exempt port properties. And calculations for underutilized lands are more dynamic.

Model Classifications

The model classifies lands into three urban land use categories--residential, commercial, and industrial. Lands are grouped into land use codes based on comprehensive plan designations for model purposes. Lands designated as parks & open space, public facility, mining lands, or airport within the urban growth areas are excluded from available land calculations. Additionally, all rural

and urban reserve designated lands are excluded from the model. Table 1 lists a breakdown of the land use classes.

Table 1: Land Use Classes

LU	Comprehensive Plan Classification	VBLM Model
1	Urban Low Density Residential	Residential – Urban Low
1	Single-Family_Low	Residential – Urban Low
1	Single-Family_Medium	Residential – Urban Low
1	Single-Family_High	Residential – Urban Low
2	Urban Medium Density Residential	Residential – Urban High
2	Urban High Density Residential	Residential – Urban High
2	Multi-Family_Low	Residential – Urban High
2	Multi-Family_High	Residential – Urban High
3	Neighborhood Commercial	Commercial
3	Community Commercial	Commercial
3	General Commercial	Commercial
3	City Center	Commercial
3	Regional Center	Commercial
3	Downtown	Commercial
3	Commercial	Commercial
4	Mixed Use	Commercial
4	Town Center	Commercial
5	Office Park/Business Park	Commercial
5	Light industrial/Business park	Commercial
5	Employment Campus	Commercial
6	Light Industrial	Industrial
6	Heavy Industrial	Industrial
6	Railroad Industrial	Industrial
6	Industrial	Industrial
33	Mixed use - Residential	Residential
34	Mixed use - Employment	Commercial

The model classifies each urban parcel as built, vacant, or underutilized by the three major land uses. Additionally lands with potential environmental concerns and/or geologic hazards as consistent with the applicable section of the Clark County and other municipal codes are classified as constrained (critical lands) lands. Constrained lands are identified by parcel in the model.

Constrained lands include:

- 100 year floodplain or flood fringe
- Wetlands inventory (NWI, high quality, permitted, modeled) with 100 foot buffer

- Slopes greater than 15 percent (>25% for City of Vancouver)
- Land slide area that has active or historically unstable slopes
- Designated shorelines
- Hydric soils with 50 foot buffer
- Habitat areas with 100 foot buffer
- Species areas with 300 foot buffer
- Riparian stream buffers by stream type (Table 2)

Table 2: Riparian Buffers

Stream Type	Countywide	Vancouver Exception
Type S (Shoreline)	250 Feet	175 Feet
Type F (Fish Bearing)	200 Feet	175 Feet
Type NP (Non-fish bearing, perennial)	100 Feet	150 Feet
Type NP (Non-fish bearing, seasonal)	75 Feet	100 Feet

Residential Model

Important residential classifications include vacant, vacant critical, underutilized, and underutilized critical. These classes are used to determine gross acres available for development. Vacant exempt, vacant lots less than 5,000 square feet and all other classes are excluded from available land calculations. Table 3 lists all residential classes.

Table 3: Residential Classifications

RESCLASS	Description
0	Not Residential
1	Built
2	Unknown
3	Vacant
4	Underutilized
5	Roads and Easements
6	Mansions and Condos
12	Built Exempt
13	Vacant Exempt
14	Vacant Critical
18	Underutilized Critical
19	Less than 5,000 square feet
20	Private Open Space
21	Parks and Open Space

Criteria for classifying residential lands are as follows:

- Residential Vacant Criteria
 - Building value less than \$13,000
 - Not tax exempt
 - Not an easement or right of way
 - Not a state assessed or institutional parcel
 - Not a mobile home park
 - Parcel greater than 5,000 square feet
- Underutilized
 - Same as Vacant except building value criteria is replaced with a building value per acre criteria.
 - Building value per acre of land is below the 10th percentile of building value per acre for all residential parcels within all UGAs. The 10th percentile is calculated by the model for each year and for each UGA alternative.
 - Parcel size greater than 1 acre
- Mansions and Condos
 - Parcel size greater than 1 acre
 - Building value per acre greater than the 10th percentile.
- Residential Exempt
 - Properties with tax exempt status
- Easements and right of ways
- Constrained (Critical lands)
 - All classifications may be subdivided into constrained vs. not constrained. Constrained lands are described above.

Commercial and Industrial Models

Commercial and industrial lands are classified using consistent criteria with one exception; industrial classes include exempt port properties in the current model.

Important commercial classes for determining gross acres available for development include vacant, vacant critical, underutilized, and underutilized critical. Vacant exempt and vacant lots less than 5,000 square feet are excluded from available land calculations. Table 4 lists all commercial classes.

Table 4: Commercial Classifications

COMCLASS	Description
0	Not Commercial
1	Built
2	Vacant
3	Underutilized
5	Vacant Lot less than 5,000 sq feet
7	Vacant Critical
9	Underutilized Critical
10	Vacant Exempt

Important industrial classes for determining gross acres available for development include vacant, vacant critical, exempt vacant port property, exempt vacant port property critical, underutilized, underutilized critical, exempt underutilized port property, and exempt underutilized port property critical. All exempt not port properties are excluded in the available land calculations. Table 5 lists all industrial classes.

Table 5: Industrial Classifications

INCLASS	Description
0	Not Industrial
1	Vacant
2	Underutilized
3	Vacant Critical
4	Underutilized Critical
6	Built
7	Exempt Vacant Port Property
8	Exempt Vacant Not Port
9	Exempt Vacant Port Property Critical
10	Exempt Underutilized Port
11	Exempt Underutilized Port Critical
12	Exempt Underutilized Not Port
15	Easements

Commercial and industrial models classify vacant and underutilized land as follows:

- Vacant land
 - Building value less than \$67,500
 - Not “Assessed With”- Some parcels are assessed with other parcels. These parcels are often parking lots, or multiple parcels comprising a single development. All assessed with parcels are considered built.
 - Not Exempt.

- Port property is exempt, and is included as a separate classification in the Industrial land model.
 - Not an Easement or right of way
 - Parcel greater than 5,000 square feet
 - Not a state assessed or institutional parcel
- Underutilized Lands
 - Same as vacant except building value criteria is replaced with a building value per acre criteria of less than \$50,000.
- Constrained (Critical lands)
 - All classifications may be subdivided into constrained vs. not constrained. Commercial and industrial constrained lands are defined the same as residential constrained lands and are listed above.
- Exempt Port Properties in the Industrial Model
 - Includes lands that are under port ownership and available for development. Buildable exempt port properties are included in available land calculations.
 - Port properties can be classified as vacant, underutilized, or constrained.

The model produces a summary of gross residential, commercial, and industrial acres available for development. Gross acres are defined as the total raw land available for development prior to any deductions for infrastructure, constrained lands, and not to convert factors.

Planning Assumptions

The next step in the buildable lands process is applying planning assumptions to the inventory of vacant and underutilized gross acres in order to arrive at a net available land supply. These assumptions account for infrastructure, reduced development on constrained land, and never to convert factors. Use factors along with employment and housing units per acre densities are applied to derived net acres to predict future capacities.

Residential Model Planning Assumptions:

- 27.7% deduction to account for both on and off-site infrastructure needs. 20% infrastructure deduction for mixed use lands.
- Never to convert factor
 - 10% for vacant land
 - 30% for underutilized
- 50% of available constrained (critical) land will not convert

- 60% of mixed use land will develop as residential, 85% residential for Battle Ground mixed use - residential and 25% residential for mixed use - employment.

Commercial and Industrial Model Planning Assumptions

- 25% infrastructure factor applied for both commercial and industrial lands.
- 20% of available constrained (critical) commercial and mixed use land will not convert
- 50% of available constrained (critical) industrial land will not convert
- 40% of mixed use land will develop as commercial, 15% commercial for Battle Ground mixed use - residential and 75% commercial for mixed use - employment.

Employees and unit per acre density assumptions are applied to net developable acres to predict future employment and housing unit capacities. Densities are set by the Current Planning staff based on observed development and comprehensive plan assumptions for each UGA.

Applied residential densities vary by UGA. Table 6 lists the units per acre by UGA.

Table 6: Residential units per Acre

Urban Growth Area	Applied Housing Units per Net Developable Acre
Battle Ground	6
Camas	6
La Center	4
Ridgefield	6
Vancouver	8
Washougal	6
Woodland	6
Yacolt	4

Applied employment densities vary by land use as well. Commercial classes which includes commercial, business park, and mixed use categories apply 20 employees per acre while industrial classes apply 9 employees per acre.

Applying residential and employment planning assumptions to the VLM results produce housing units and employment carrying capacity estimates for urban growth areas. These estimates help monitor growth on an annual basis and is part of the criteria used for setting UGA boundaries during growth management plan updates.

Current model layers and reports are available for viewing in Clark County's GIS MapsOnline web application at:

<http://gis.clark.wa.gov/vblm/>

Underutilized land classes are grouped with vacant classes by land use in MapsOnline and on other map products. Table 7 lists the group classes used for mapping.

Table 7: Group Classes

GRPCLASS	Description
1	Built
2	Built w/Critical
3	Residential Vacant
4	Residential Vacant w/Critical
5	Commercial Vacant
6	Commercial Vacant w/Critical
7	Industrial Vacant
8	Industrial Vacant w/Critical
9	Public Facilities
10	Public Facilities w/Critical
11	Parks and Open Space
12	Parks and Open Space w/Critical
13	Roads and Easements

For more information on the model inputs, structure and outputs, please contact Clark County Community Planning at (360) 397-2280 or Clark County Geographic Information System (GIS) at (360) 397-2002.

February 2016 BOCC Preferred Alt Summary Totals 2016

RESIDENTIAL	Gross Acres	Will Not Convert Acres	Infrastructure Acres	Developable Net Acres	Housing Units	Persons
Battle Ground						
City	1,797.3	711.9	299.2	786.1	4,716.8	12,546.6
UGA	740.0	283.7	124.3	331.9	1,991.7	5,297.9
Total	2,537.2	995.6	423.5	1,118.1	6,708.4	17,844.5
Camas						
City	1,517.4	561.5	264.8	691.2	4,147.0	11,030.9
UGA	383.9	141.1	67.3	175.5	1,053.2	2,801.5
Total	1,901.3	702.5	332.1	866.7	5,200.2	13,832.4
La Center						
City	570.6	227.5	94.5	248.6	994.4	2,645.1
UGA	314.2	145.8	46.7	121.8	487.1	1,295.6
Total	884.8	373.2	141.2	370.4	1,481.4	3,940.7
Ridgefield						
City	1,535.4	643.2	247.1	645.0	3,870.3	10,294.9
UGA	921.2	379.7	150.0	391.4	2,348.7	6,247.4
Total	2,456.6	1,023.0	397.1	1,036.5	6,218.9	16,542.3
Vancouver						
City	1,178.7	412.0	211.6	555.2	4,441.5	11,814.3
UGA	6,498.8	2,418.2	1,124.4	2,956.3	23,650.2	62,909.6
Total	7,677.5	2,830.1	1,335.9	3,511.5	28,091.7	74,723.9
Washougal						
City	659.1	247.4	113.2	298.6	1,791.4	4,765.1
UGA	403.9	166.8	65.7	171.4	1,028.4	2,735.6
Total	1,063.1	414.3	178.8	470.0	2,819.8	7,500.7
Yacolt						
City	65.6	14.8	14.1	36.7	147.0	390.9
UGA	16.4	6.4	2.8	7.3	29.1	77.3
Total	82.0	21.1	16.9	44.0	176.0	468.3
Woodland						
City	5.8	3.1	0.8	2.0	8.0	21.2
UGA	88.9	56.8	8.9	23.3	93.0	247.4
Total	94.8	59.9	9.7	25.2	101.0	268.5
RESIDENTIAL TOTAL	16,697.2	6,419.8	2,835.1	7,442.3	50,797.5	135,121.2

COMMERCIAL	Gross Acres	Will Not Convert Acres	Infrastructure Acres	Developable Net Acres	Jobs
Battle Ground					
City	580.2	90.9	123.9	365.3	7,306.8
UGA	98.2	11.6	21.6	64.9	1,298.3
Total	678.4	102.5	145.6	430.3	8,605.1
Camas					
City	499.7	63.3	109.1	327.2	6,544.7
UGA	0.0	0.0	0.0	0.0	0.0
Total	499.7	63.3	109.1	327.2	6,544.7
La Center					
City	61.5	4.4	14.3	42.8	856.7
UGA	54.3	4.0	12.6	37.8	755.7
Total	115.9	8.4	26.9	80.6	1,612.4
Ridgefield					
City	283.0	32.2	62.7	188.1	3,762.3
UGA	10.4	1.0	2.3	7.0	140.3
Total	293.4	33.2	65.0	195.1	3,902.7
Vancouver					
City	484.2	25.2	114.7	344.2	6,884.2
UGA	835.7	58.5	194.3	582.9	11,658.5
Total	1,319.9	83.7	309.0	927.1	18,542.6
Washougal					
City	74.2	7.3	16.7	50.2	1,003.3
UGA	45.5	3.2	10.6	31.8	635.0
Total	119.7	10.5	27.3	81.9	1,638.4
Yacolt					
City	14.1	0.0	3.5	10.6	211.5
UGA	0.0	0.0	0.0	0.0	0.0
Total	14.1	0.0	3.5	10.6	211.5
Woodland					
City	0.0	0.0	0.0	0.0	0.0
UGA	0.0	0.0	0.0	0.0	0.0
Total	0.0	0.0	0.0	0.0	0.0
COMMERCIAL TOTAL	3,041.0	301.6	686.5	2,052.9	41,057.3

0

INDUSTRIAL	Gross Acres	Will Not Convert Acres	Infrastructure Acres	Developable Net Acres	Jobs
Battle Ground					
City	307.3	91.9	53.9	161.6	1,454.5
UGA	0.0	0.0	0.0	0.0	0.0
Total	307.3	91.9	53.9	161.6	1,454.5
Camas					
City	848.7	240.1	152.1	456.4	4,108.0
UGA	72.6	26.4	11.5	34.6	311.5
Total	921.2	266.5	163.7	491.1	4,419.5
La Center					
City	83.3	19.1	16.1	48.2	433.5
UGA	1.1	0.2	0.2	0.7	6.1
Total	84.4	19.3	16.3	48.8	439.6
Ridgefield					
City	941.4	266.5	168.7	506.2	4,555.5
UGA	65.3	17.7	11.9	35.7	321.5
Total	1,006.7	284.1	180.6	541.9	4,877.0
Vancouver					
City	2,650.7	841.2	452.4	1,357.1	12,213.7
UGA	1,779.3	484.6	323.7	971.0	8,739.0
Total	4,429.9	1,325.8	776.0	2,328.1	20,952.7
Washougal					
City	218.4	87.7	32.7	98.0	881.9
UGA	286.8	63.8	55.8	167.3	1,505.5
Total	505.2	151.5	88.4	265.3	2,387.5
Yacolt					
City	9.7	0.9	2.2	6.5	58.9
UGA	39.6	10.3	7.3	21.9	197.5
Total	49.2	11.3	9.5	28.5	256.4
Woodland					
City	0.0	0.0	0.0	0.0	0.0
UGA	0.0	0.0	0.0	0.0	0.0
Total	0.0	0.0	0.0	0.0	0.0
INDUSTRIAL TOTAL	7,304.1	2,150.4	1,288.4	3,865.2	34,787.1

0

Estimating Potential Rural Housing and Employment Clark County, Washington

The Rural Vacant Buildable Land Model (Rural VBLM) estimates the number of houses and jobs on lands outside of the Urban Growth Area. Rural lands and rural development behave differently than urban development. These differences are significant enough to require a new VBLM classification method. This document describes the Rural VBLM.

The Rural VBLM works very similar to the Urban VBLM. The primary input is a proposed land use layer. This layer is used to classify lands into the 3 VBLM land use categories: Residential, Commercial, or Industrial. The Assessor's database is used to classify the parcels into VBLM classifications: Vacant, Built, Underutilized, Excluded) based on the property type, ownership, and size. The Residential Rural VBLM differs most substantially from the Urban VBLM.

Rural VBLM Land Uses

Land use designations from the comprehensive plan or proposed zoning plan are categorized into the three land use models.

- Residential – rural, rural center residential, urban reserve, agriculture, and forest land use designations
- Commercial – commercial land use designations
- Industrial – industrial land use designations

Residential VBLM Classifications

Property with a proposed land use of Residential are subdivided into the following VBLM categories based on information from the Assessor's database.

- Built
 - Parcel has existing housing units
 - Parcel is too small to be further divided based on minimum lot size requirements
- Vacant
 - No existing housing units
 - May contain outbuildings
- Underutilized
 - Parcel has existing housing units
 - Parcel is large enough to be further divided based on minimum lot size requirements
- Excluded
 - Forest zoned lands in the Current Use program (Timber or Designated Forest Land (DFL))
 - Remainder lots of cluster developments
 - Surface mining overlay area
 - Water Areas
 - Private street or Right of Way
 - Transportation or utilities
 - Private park or recreation areas
 - Assessed as a zero value property
 - Size is less than 1 acre
 - Tax exempt

- Not a Residential land use

Residential Planning Assumptions:

- Housing capacity calculation:
 - One housing unit per undersized vacant parcel
 - Conforming vacant and underutilized parcels
 - Housing unit capacity is calculated by dividing the parcel acres by the minimum lot size.
 - For dividable parcels remainder lots are considered buildable if they are within 10% of the minimum lot size.
- Population Capacity calculation
 - 2.66 persons per housing unit

Employment

Most of the rural area is designated rural residential but there are pockets of commercial and industrial areas available for future employment. Commercial and Industrial lands use the same Rural VBLM classifications. The only difference is in the number of employees per acre

Commercial and Industrial VBLM Classifications

- Vacant
 - Building value less than \$67,500
- Underutilized
 - Parcels with existing buildings that have a building value per acre less than \$50,000
- Excluded
 - Surface mining overlay area
 - Water
 - Private street
 - Right of Way
 - Utilities
 - A Private park or recreation areas
 - Assessed as a zero value property
 - Tax exempt
- Built
 - Building value of \$67,500 or more
- Not Commercial or industrial

Employment Planning Assumptions:

- Vacant and underutilized lands receive the same number of employees per acre.
 - No reductions for constrained areas or infrastructure
 - Commercial employment
 - 20 employees per acre
 - Industrial employment
 - 9 employee per acre

Potential Housing Units and Persons in Rural Clark County								
Zone	Conforming Parcels				Undersized Parcels		Total	
	VACANT		UNDERUTILIZED		VACANT			
	Net Acres	Housing Units	Net Acres	Housing Units	Net Acres	Housing Units	Housing Units	Persons
AG-10	7,822.02	712	10,879.19	705	1,550.76	333	1,750	4,655
AG/WL	269.50	1	0.00	0	377.64	15	16	43
FR-20	1,300.50	60	641.31	16	1,143.29	225	301	801
FR-80	320.43	3	0.00	0	1,436.25	108	111	295
GLSA 40	593.23	13	96.44	1	133.02	12	26	69
GLSA 80	293.45	3	0.00	0	186.51	6	9	24
GR 10	15.71	1	41.77	2	23.48	5	8	21
GR 5	17.93	3	0.00	0	18.18	8	11	29
GSAG	131.62	5	64.19	2	10.29	1	8	21
GSFF	0.00	0	0.00	0	25.17	2	2	5
GSSA	100.39	5	157.72	5	34.00	5	15	40
GSW 20	38.44	2	39.83	1	31.73	5	8	21
GSW 40	0.00	0	0.00	0	8.32	1	1	3
R-10	5,132.96	464	4,376.89	255	1,880.69	422	1,141	3,035
R-20	761.81	35	558.94	15	420.55	73	123	327
R-5	10,548.35	1,927	9,151.32	1,074	2,746.27	1,118	4,119	10,957
RC-1	100.31	94	283.92	179	0.00	0	273	726
RC-2.5	149.57	53	179.72	40	14.57	9	102	271
Total	27,596.22	3,381	26,471.24	2,295	10,040.72	2,348	8,024	21,343

Potential Employment in Rural Clark County				
Zone	VACANT		UNDERUTILIZED	
	Acres	Jobs	Acres	Jobs
CR-1	38.59	771.71	8.16	163.28
CR-2	68.60	1,372.08	46.53	930.59
IH	121.35	121.35	78.86	78.86
Total	228.54	2,265.14	133.55	1,172.73

Appendix C. 303(d) Surface Waters

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Appendix C. 303(d) Surface Waters in Clark County

Water Body	Parameter	Change
Big Tree Creek	Temperature, Bacteria	Stream not previously identified on 2004 303(d) list for Clark County
Breeze Creek	Temperature, Bacteria	Temperature added to previously identified impairment
Burnt Bridge Creek	Bacteria, pH, Dissolved Oxygen, Temperature	pH added to previously identified impairments
Cedar Creek	Bacteria	Stream not previously identified on 2004 303(d) list for Clark County
China Ditch	Dissolved Oxygen, Temperature	No change
China Ditch Lateral	Dissolved Oxygen, Temperature	No change
Columbia River	Temperature, Bacteria, Dissolved Oxygen	Dissolved Oxygen added to previously identified impairments; TMDL developed for previously identified impairments including Dioxin and Total Dissolved Gas; No current listing for Dioxin or PCB
Curtin Creek	Dissolved Oxygen, pH	No change
Dean Creek	Temperature	Stream not previously identified on 2004 303(d) list for Clark County
Dwyer Creek	Dissolved Oxygen	No change
Fifth Plain Creek	Dissolved Oxygen, Temperature	No change
Gee Creek	Bacteria	No change
Jenny Creek	Bacteria, Temperature	Stream not previously identified on 2004 303(d) list for Clark County
King Creek	Temperature	Stream not previously identified on 2004 303(d) list for Clark County
Lacamas Creek	Dissolved Oxygen, Temperature, Bacteria, pH	No change
Lacamas Lake	Total Phosphorous	No change
Lake River	Temperature; Bacteria; 2,3,7,8-TCDD; 4,4-DDE; Dieldrin; PCB	2,3,7,8-TCDD; 4,4-DDE, Dieldrin, and PCB added to previously identified impairments
Lewis River	Total Dissolved Gas	Temperature no longer identified on the 303(d) for the Lewis River
Lewis River – East Fork	Temperature, Bacteria	No change
Lockwood Creek	Bacteria, Temperature	Temperature added to previously identified impairments
Mason Creek	Bacteria, Temperature	Stream not previously identified on 2004 303(d) list for Clark County
Matney Creek	Bacteria, Temperature, Dissolved Oxygen	No change

Water Body	Parameter	Change
McCormick Creek	Bacteria	No change
Merwin Lake	PCB	Lake not previously identified on 303(d) list
Peterson Ditch	Bacteria, Temperature	Stream not previously identified on 2004 303(d) list for Clark County
Riley Creek	Bacteria	Stream not previously identified on 2004 303(d) list for Clark County
Rock Creek	Bacteria, Temperature	Temperature added to previously identified impairments
Round Lake	pH, Dissolved Oxygen	No change
Salmon Creek	pH, Dissolved Oxygen	TMDL approved and Implementation Plan in place for Bacteria, Temperature, and Turbidity, which were previously identified parameters.
Shanghai Creek	Temperature, Dissolved Oxygen, pH	No change
Unnamed tributary to Brezee Creek	Bacteria	Stream not previously identified on 2004 303(d) list for Clark County
Vancouver Lake	Total Phosphorous; Bacteria; Toxaphene; 2,3,7,8-TCDD; Dieldrin; PCB	2,3,7,8-TCDD; Toxaphene, and Dieldrin added to previously identified impairments
Weaver Creek	pH	No change
Whipple Creek	Bacteria	No change
Yacolt Creek	Bacteria	Stream not previously identified on 2004 303(d) list for Clark County

Source: 2012 Washington State 303(d) list of impaired water bodies.

Appendix D. Species Lists

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APPENDIX D

Table 1. Definitions of WDFW Priority Upland Habitat Types Found in Clark County

Priority Habitat	Description
Aspen Stands	Pure or mixed stands of aspen greater than 0.4 ha (1 acre).
Biodiversity Areas and Corridors	<p>Biodiversity Area: An area identified as biologically diverse through a scientifically based assessment conducted over a landscape scale; or area is within a city or an urban growth area (UGA) and contains habitat that is valuable to fish or wildlife and is mostly comprised of native vegetation.</p> <p>Biodiversity Corridor: A relatively undisturbed, unbroken tract of vegetation connecting fish and wildlife habitat conservation areas, priority habitats, areas identified as biologically diverse or valuable habitats within a city or UGA.</p>
Herbaceous Balds	Variable-sized patches of grass and forb vegetation located on shallow soils over bedrock, commonly fringed by forest or woodland. Typically consists of low-growing vegetation adapted for survival on shallow soils amid seasonally dry conditions, often on steep slopes.
Old-growth/Mature Forest	<p>Old-growth west of Cascade crest: Stands > 3 ha (7.5 acres) having at least 2 tree species, forming a multi-layered canopy with occasional small openings; with at least 20 trees/ha (8 trees/acre) that are >81 cm (32 in) dbh or > 200 years of age; and > 10 snags/ha (4 snags/acre) over 51 cm (20 in) diameter and 4.6 m (15 ft) tall; with numerous downed logs, including 10 logs/ha (4 logs/acre) that are > 61 cm (24 in) diameter and > 15 m (50 ft) long. High elevation stands (> 762m [2500ft]) may have lesser dbh [> 76 cm (30 in)], fewer snags [> 0.6/ha (1.5/acre)], and fewer large downed logs [0.8 logs/ha (2 logs/acre) that are > 61 cm (24 in) diameter and > 15 m (50 ft) long].</p> <p>Mature forests: Stands with average diameters exceeding 53 cm (21 in) dbh; crown cover may be less than 100%; decay, decadence, numbers of snags, and quantity of large downed material is generally less than that found in old-growth; 80 - 200 years old west of the Cascade crest.</p>
Oregon White Oak Woodlands	Stands of oak or oak/conifer associations where canopy coverage of the oak component of the stand is 25%; or where total canopy coverage of the stand is <25%, but oak accounts for at least 50% of the canopy coverage. The latter is often referred to as oak savanna. In non-urbanized areas west of the Cascades, priority oak habitat consists of stands > 0.4 ha (1.0 ac) in size. In urban or urbanizing areas, single oaks or stands < 0.4 ha (1 ac) may also be considered a priority when found to be particularly valuable to fish and wildlife.
West Side Prairie	Herbaceous, non-forested (< 60% forest canopy cover) plant communities that can either take the form of a dry prairie where soils are well-drained or a wet prairie. Typically occurs on soil types known to be associated with prairie. The presence of certain diagnostic plants is required to establish an occurrence of prairie, although invasive plants are often dominant.

Priority Habitat	Description
Caves	A naturally occurring cavity, recess, void, or system of interconnected passages (including associated dendritic tubes, cracks, and fissures) which occurs under the earth in soils, rock, ice, or other geological formations, and is large enough to contain a human. Mine shafts (a human-made excavation in the earth usually used to extract minerals) may mimic caves, and abandoned mine shafts with actual or suspected occurrences of priority species should be treated in a manner similar to caves.
Cliffs	Greater than 7.6 meters (25 feet) high and occurring below 1524 meters (5000 feet).
Snags and Logs	Trees are considered snags if they are dead or dying and exhibit sufficient decay characteristics to enable cavity excavation/use by wildlife. Priority snags have a diameter at breast height of > 51 cm (20 in) in western Washington and are > 2 m (6.5 ft) in height. Priority logs are > 30 cm (12 in) in diameter at the largest end, and > 6 m (20 ft) long. Priority snag and log habitat includes individual snags and/or logs, or groups of snags and/or logs of exceptional value to wildlife due to their scarcity or location in a particular landscape. Areas with abundant, well-distributed snags and logs are also considered priority snag and log habitat. Examples include large, sturdy snags adjacent to open water, remnant snags in developed or urbanized settings, and areas with a relatively high density of snags.
Talus	Homogenous areas of rock rubble ranging in average size 0.15 - 2.0 m (0.5 - 6.5 ft), composed of basalt, andesite, and/or sedimentary rock, including riprap slides and mine tailings. May be associated with cliffs.

Sources: WDFW 2008, 2013

APPENDIX D

Table 2. Washington State Priority Species Known to Occur in Clark County

Common Name	Scientific Name	State Status
Plants		
Oregon bolandra	<i>Bolandra oregano</i>	Sensitive
Dense sedge	<i>Carex densa</i>	Threatened
Few-flowered collinsia	<i>Collinsia sparsiflora</i> var. <i>bruceae</i>	Sensitive
Oregon coyote-thistle	<i>Eryngium petiolatum</i>	Threatened
Western wahoo	<i>Euonymus occidentalis</i> var. <i>occidentalis</i>	Sensitive
Western sweetvetchh	<i>Hedysarum occidentale</i> var. <i>occidentale</i>	Sensitive
Nuttall's quillwort	<i>Isoetes nuttallii</i>	Sensitive
Smooth goldfields	<i>Lasthenia glaberrima</i>	Endangered
Branching montia	<i>Montia diffusa</i>	Sensitive
California broomrape	<i>Orobanche California</i> ssp. <i>Grayana</i>	Endangered
Western yellow oxalis	<i>Oxalis suksdorfii</i>	Threatened
Oregon yampah	<i>Perideridia oregano</i>	Sensitive
Western false dragonhead	<i>Physostegia parviflora</i>	Review group 1
Wheeler's bluegrass	<i>Poa nervosa</i>	Sensitive
Great polemonium	<i>Polemonium carneum</i>	Threatened
Idaho gooseberry	<i>Ribes oxyacanthoides</i> var. <i>irriguum</i>	Threatened
Soft-leaved willow	<i>Salix sessilifolia</i>	Sensitive
Hairy-stemmed checker-mallow	<i>Sidalcea hirtipes</i>	Threatened
Western ladies' tresses	<i>Spiranthes porrifolia</i>	Sensitive
Hall's aster	<i>Symphotrichum hallii</i>	Threatened
Small-flowered trillium	<i>Trillium parviflorum</i>	Sensitive
Columbia water-meal	<i>Wolffia Columbiana</i>	Review group 1
California compassplant	<i>Wyethia angustifolia</i>	Sensitive
Fish		
Leopard dace	<i>Rhinichthys falcatus</i>	Candidate
Mountain sucker	<i>Catostomus platyrhynchus</i>	Candidate

Common Name	Scientific Name	State Status
White sturgeon	<i>Acipenser transmontanus</i>	Vulnerable aggregations; Species of recreational, commercial, or tribal importance
Kokanee	<i>Oncorhynchus nerka</i>	Species of recreational, commercial, or tribal importance
Pink salmon	<i>Oncorhynchus gorbuscha</i>	Vulnerable aggregations; Species of recreational, commercial, or tribal importance
Wildlife		
Cascade torrent salamander	<i>Rhyacotriton cascadae</i>	Candidate
Western grebe	<i>Aechmophorus occidentalis</i>	Candidate
Golden eagle	<i>Aquila chrysaetos</i>	Candidate
Sandhill crane	<i>Grus Canadensis</i>	Endangered
Vaux's swift	<i>Chaetura vauxi</i>	Candidate
Pileated woodpecker	<i>Dryocopus pileatus</i>	Candidate
Purple martin	<i>Progne subis</i>	Candidate
Gray-tailed vole	<i>Microtus canicaudus</i>	Candidate
Great blue heron	<i>Ardea Herodias</i>	Vulnerable aggregations
Cavity-nesting ducks	<i>Wood Duck (Aix sponsa), Barrow's Goldeneye (Bucephala islandica), Common Goldeneye (Bucephala clangula), Bufflehead (Bucephala albeola), Hooded Merganser (Lophodytes cucullatus)</i>	Species of recreational, commercial, or tribal importance
Non-breeding concentrations of Barrow's goldeneye, common goldeneye, bufflehead	<i>Barrow's Goldeneye (Bucephala islandica), Common Goldeneye (Bucephala clangula), Bufflehead (Bucephala albeola)</i>	Vulnerable aggregations; Species of recreational, commercial, or tribal importance
Trumpeter swan	<i>Cygnus buccinators</i>	Vulnerable aggregations; Species of recreational, commercial, or tribal importance
Tundra swan	<i>Cygnus columbianus</i>	Vulnerable aggregations; Species of recreational, commercial, or tribal importance
Waterfowl concentrations	Anatidae excluding Canada Geese in urban areas	Vulnerable aggregations; Species of recreational, commercial, or tribal importance
Mountain quail	<i>Oreortyx pictus</i>	Species of recreational, commercial, or tribal importance

Common Name	Scientific Name	State Status
Sooty grouse	<i>Dendragapus fuliginosus</i>	Species of recreational, commercial, or tribal importance
Non-breeding concentrations of shorebirds	Charadriidae Scolopacidae Phalaropodidae	Vulnerable aggregations
Band-tailed pigeon	<i>Columba fasciata</i>	Species of recreational, commercial, or tribal importance
Roosting concentrations of big brown bat, Myotis bats, pallid bat	<i>Big-brown Bat (Eptesicus fuscus), Myotis bats (Myotis spp.), Pallid Bat (Antrozous pallidus)</i>	Vulnerable aggregations
Marten	<i>Martes Americana</i>	Species of recreational, commercial, or tribal importance
Columbia black-tailed deer	<i>Odocoileus hemionus columbianus</i>	Species of recreational, commercial, or tribal importance
Elk	<i>Cervus elaphus</i>	Species of recreational, commercial, or tribal importance
California sea lion	<i>Zalophus californianus</i>	Vulnerable aggregations
Harbor seal	<i>Phoca vitulina</i>	Vulnerable aggregations
Steller sea lion	<i>Eumetopias jubatus</i>	Threatened

Sources: WDFW 2008, 2013, 2014

APPENDIX D

Table 3. Federally Listed Threatened & Endangered Species and Critical Habitat Found in Clark County

Common Name	Scientific Name	Federal Status	State Status	Habitat
Plants				
Bradshaw's desert parsley	<i>Lomatium bradshawii</i>	Endangered	Endangered	Low-elevation grasslands and prairies; seasonally flooded areas near streams.
Golden paintbrush	<i>Castilleja levisecta</i>	Threatened	Endangered	Open grasslands, prairies.
Water howellia	<i>Howellia aquatilis</i>	Threatened	Threatened	Low-elevation wetlands, vernal pools.
Fish				
Columbia River chum	<i>Oncorhynchus keta</i>	Threatened	Candidate	Spawn in fresh water, mature in salt water.
Lower Columbia River coho	<i>Oncorhynchus kisutch</i>	Threatened	None	Spawn in fresh water, mature in salt water.
Chinook (Lower Columbia River, Snake River Fall, Snake River Spring/Summer, Upper Columbia River Spring, Upper Willamette River)	<i>Oncorhynchus tshawytscha</i>	Threatened (Lower Columbia, Snake River, Upper Willamette River) Endangered (Upper Columbia River)	Candidate	Spawn in fresh water, mature in salt water.
Steelhead (Lower Columbia River, Upper Columbia River, Snake River Basin, Middle Columbia River, Upper Willamette River)	<i>Oncorhynchus mykiss</i>	Threatened	Candidate	Spawn in fresh water, mature in salt water.
Sockeye (Snake River Basin)	<i>Oncorhynchus nerka</i>	Endangered	Candidate	Spawn in fresh water, mature in salt water.
Pacific eulachon	<i>Thaleichthys pacificus</i>	Threatened	Candidate	Spawn in fresh water, mature in salt water.
Green sturgeon southern DPS	<i>Acipenser medirostris</i>	Threatened	None	Spawn in fresh water, mature in salt water.
Bull trout	<i>Salvelinus confluentus</i>	Threatened	Candidate	Typically fresh water, rarely migrating in salt water.

Common Name	Scientific Name	Federal Status	State Status	Habitat
Wildlife				
Oregon spotted frog	<i>Rana pretiosa</i>	Threatened	Endangered	Perennial water bodies, especially large marshes.
Northern spotted owl	<i>Strix occidentalis caurina</i>	Threatened	Endangered	Old-growth forest.
Streaked horned lark	<i>Eremophila alpestris strigata</i>	Threatened	Endangered	Wide open areas with sparse vegetation; airports; dredge spoil piles.
Yellow billed cuckoo	<i>Coccyzus americanus</i>	Threatened	Candidate	Forested riparian areas.
Gray wolf	<i>Canis lupus</i>	Endangered	Endangered	Range of habitats, from grasslands to forest.
Fisher	<i>Martes pennant</i>	Proposed Threatened	Endangered	Middle to lower elevation forests with large trees, snags, logs.

Sources: NOAA Fisheries 2012, USFWS 2014, WDFW 2008, 2013, 2014, WNHP 2014, WNHP rare plant online information (<http://www1.dnr.wa.gov/nhp/refdesk>), USFWS species profiles (<http://ecos.fws.gov/speciesProfile>), USFWS critical habitat portal mapper (<http://crithab.fws.gov/crithab>).

APPENDIX D

Table 4. Federal Species of Concern in Clark County

Common Name	Scientific Name	Federal Status	State Status
Plants			
Tall bugbane	<i>Cimicifuga elata</i>	Species of Concern	Sensitive
Clackamas corydalis	<i>Corydalis aquae-gelidae</i>	Species of Concern	Sensitive
Torrey's peavine	<i>Lathyrus torreyi</i>	Species of Concern	Threatened
Fish			
Pacific lamprey	<i>Entosphenus tridentata</i>	Species of Concern	None
River lamprey	<i>Lampetra ayresi</i>	Species of Concern	Candidate
Coastal resident/Sea-run cutthroat	<i>Oncorhynchus clarki clarki</i>	Species of Concern	None
Wildlife			
Larch Mountain salamander	<i>Plethodon larselli</i>	Species of Concern	Sensitive
Western toad	<i>Anaxyrus boreas</i>	Species of Concern	Candidate
Pacific pond turtle	<i>Actinemys marmorata</i>	Species of Concern	Endangered
Bald eagle	<i>Haliaeetus leucocephalus</i>	Species of Concern	Sensitive
Northern goshawk	<i>Accipiter gentilis</i>	Species of Concern	Candidate
Peregrine falcon	<i>Falco peregrinus</i>	Species of Concern	Sensitive
Slender-billed white-breasted nuthatch	<i>Sitta carolinensis aculeate</i>	Species of Concern	Candidate
Townsend's big-eared bat	<i>Corynorhinus townsendii</i>	Species of Concern	Candidate

Sources: WDFW, 2008, 2013, 2014, WNHP 2014.

APPENDIX D

Table 5. Migratory Birds of Concern in Clark County

Common Name	Scientific Name	Seasonal Occurrence
Bald eagle	<i>Haliaeetus leucocephalus</i>	Year-round
Brewer's sparrow	<i>Spizella breweri</i>	Breeding
Calliope hummingbird	<i>Stellula calliope</i>	Breeding
Caspian tern	<i>Hydroprogne caspia</i>	Breeding
Cassin's finch	<i>Carpodacus cassinii</i>	Year-round
Ferruginous hawk	<i>Buteo regalis</i>	Breeding
Flammulated owl	<i>Otus flammeolus</i>	Breeding
Fox sparrow	<i>Passerella iliaca</i>	Breeding, wintering
Long-billed curlew	<i>Numenius americanus</i>	Breeding
Olive-sided flycatcher	<i>Contopus cooperi</i>	Breeding
Peregrine falcon	<i>Falco peregrines</i>	Breeding
Purple finch	<i>Carpodacus purpureus</i>	Year-round
Rufous hummingbird	<i>Selasphorus rufus</i>	Breeding
Sage thrasher	<i>Oreoscoptes montanus</i>	Breeding
Short-eared owl	<i>Asio flammeus</i>	Year-round
Tricolored blackbird	<i>Agelaius tricolor</i>	Breeding
Vesper sparrow	<i>Pooecetes gramineus ssp. Affinis</i>	Breeding
Willow flycatcher	<i>Empidonax traillii</i>	Breeding

Source: USFWS 2014

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Appendix E. Transportation Technical Memorandum

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DRAFT MEMORANDUM #2

DATE: April 5, 2016
TO: Matt Hermen, Clark County
FROM: Ray Delahanty, AICP – DKS Associates
Aaron Berger, PE – DKS Associates
Jasmine Pahukula – DKS Associates
SUBJECT: Clark County Future Conditions – Draft Project List

P14180-006

The purpose of this memorandum is to outline the methodology used to identify the projects needed to address future transportation deficiencies within the unincorporated areas of Clark County for the 2035 planning horizon.

The RTC 2035 Committed and 2035 Capital Facilities Plan travel demand models were used for this analysis. These models have been updated to include the most recent land use assumptions for the rural areas in unincorporated Clark County. The 2035 Committed model displays the transportation network with projects that have been completed, plus projects contained in all of Clark County’s jurisdictional Transportation Improvement Programs (TIP) with secured funding through 2021. This network defines a “guaranteed” network. The 2035 Capital Facilities Plan model contains the Committed model network, plus all Clark County jurisdiction’s Capital Facilities Plan. This network defines the “guaranteed” network, plus projects that are “likely” to be funded. Comparing the two models allows this analysis to confirm, delete, or add projects to Clark County’s Capital Facilities Plan. Please note that the Capital Facilities Plan model contains projects in Clark County’s 2014-2033 Capital Facilities Plan. This analysis forecasts needs, per WAC 365-196-415(2)(b), for the 2015-2035 Clark County Comprehensive Growth Management Plan.

METHODOLOGY

This analysis focused on two types of transportation deficiencies: segments (link) and intersections. The analysis did not include network connectivity as a deficiency measure. This measure will be addressed through coordination with the county.

Segment (Link) Analysis

The link deficiency analysis focused on the PM peak hour Committed 2035 RTC model. All links showing volume to capacity (v/c) ratios greater than 0.90 were identified as corridor level deficiencies. Once the deficiencies were identified, the PM Peak hour Capital Facilities Plan 2035 RTC model was analyzed for deficiencies, using the same link level criteria (v/c > 0.9). The link level network improvements between

the Committed model and Capital Facilities Plan model were identified as projects, and reviewed to determine which (if any) deficiency each project addressed. The projects that met an identified link level deficiency were kept in the updated Financially Constrained Project list. Projects included in the Financially Constrained model but not addressing any identified deficiencies were removed from the updated Capital Facilities Plan Project list. All link deficiencies identified in the Capital Facilities Plan model were addressed with new capacity improvement projects. These projects were added to the updated Capital Facilities Plan Project list.

Comparisons between the RTC models with the old land use and the updated land use indicated significant trip loss within the Vancouver city limits, especially on the freeways (I-5 and I-205). As this trip loss was attributed to some outdated land use projects within the Vancouver city limits, the major WSDOT projects on I-5 and I-205 were not compared to modeled deficiencies, but were kept unchanged on the updated Capital Facilities Plan project list. The same approach was used when analyzing projects in urban areas near the Vancouver city limits.

All new segment projects were coded simply as increased link level capacity within the travel models. In addition, the Committed model network was updated to include all the committed projects from the most recent Capital Facilities Plan.

Intersection Analysis

The intersection deficiency analysis also focused on the PM peak hour Committed 2035 RTC model. The analysis focused on unsignalized intersections with forecasted volumes high enough to trigger possible improvements. Unsignalized intersection deficiencies were estimated based on the conflicting major/minor street unsignalized capacities, as outlined in Table 4C-1 of the MUTCD¹. The conflicting volume analysis helps identify intersections that may fail to meet LOS E standards or may meet signal warrants. As all the intersection analysis was performed at the approach link level (turn volumes were not analyzed). Intersections identified by this process do not necessarily require signalization, and in some cases, other intersection improvements may be sufficient. The potential deficiencies were revised after assuming some traffic disaggregation on the modeled collector roadways, as the Committed 2035 RTC model is a simplified network with aggregated volumes. For example, potential deficiencies that were triggered based on aggregated volumes from local roads not included in the Committed 2035 RTC model were not included as intersection deficiencies since these volumes would likely be spread across multiple intersections. Next, the intersection deficiencies were compared to the corridor level deficiencies and overlapping deficiencies were grouped into one project. All remaining intersection deficiencies identified were addressed with new intersection improvement projects. These projects were added to the updated Capital Facilities Plan Project list.

The committed and financially constrained segment and intersection projects for the Clark County unincorporated areas are shown in the attached figure and tables.

PROJECT IDENTIFICATION

The methodology used to analyze segments and intersections resulted in the *Clark County 2035 Draft Capital Improvements Project List*. This list separates projects into six categories:

¹ Manual on Uniform Traffic Control Devices (MUTCD), 2009 Edition, Federal Highway Administration, May 2012.

- Modified Existing CFP Projects
- Newly Identified CFP Projects
- Removed Existing CFP Projects
- Committed CFP Projects
- Existing CFP Projects
- WSDOT Projects

The modified “Existing CFP Projects” category recommend amending one project currently listed in the 2016-2021 Transportation Improvement Program. The “Newly Identified CFP Projects” section recommend adding 26 projects to the 20-year Capital Facilities Plan. The “Removed Existing CFP Projects” section recommends removing a project from the 20-year Capital Facilities Plan because it was not identified as a capacity need. The “Committed CFP Projects” section identifies projects in the existing 2016-2021 Transportation Improvement Program (TIP) that are needed to serve future growth. The “Existing CFP Projects” category identifies projects that are currently included in the 2014-2033 Capital Facilities Plan that are still needed. The “WSDOT Projects” category includes projects using state funds on State facilities.

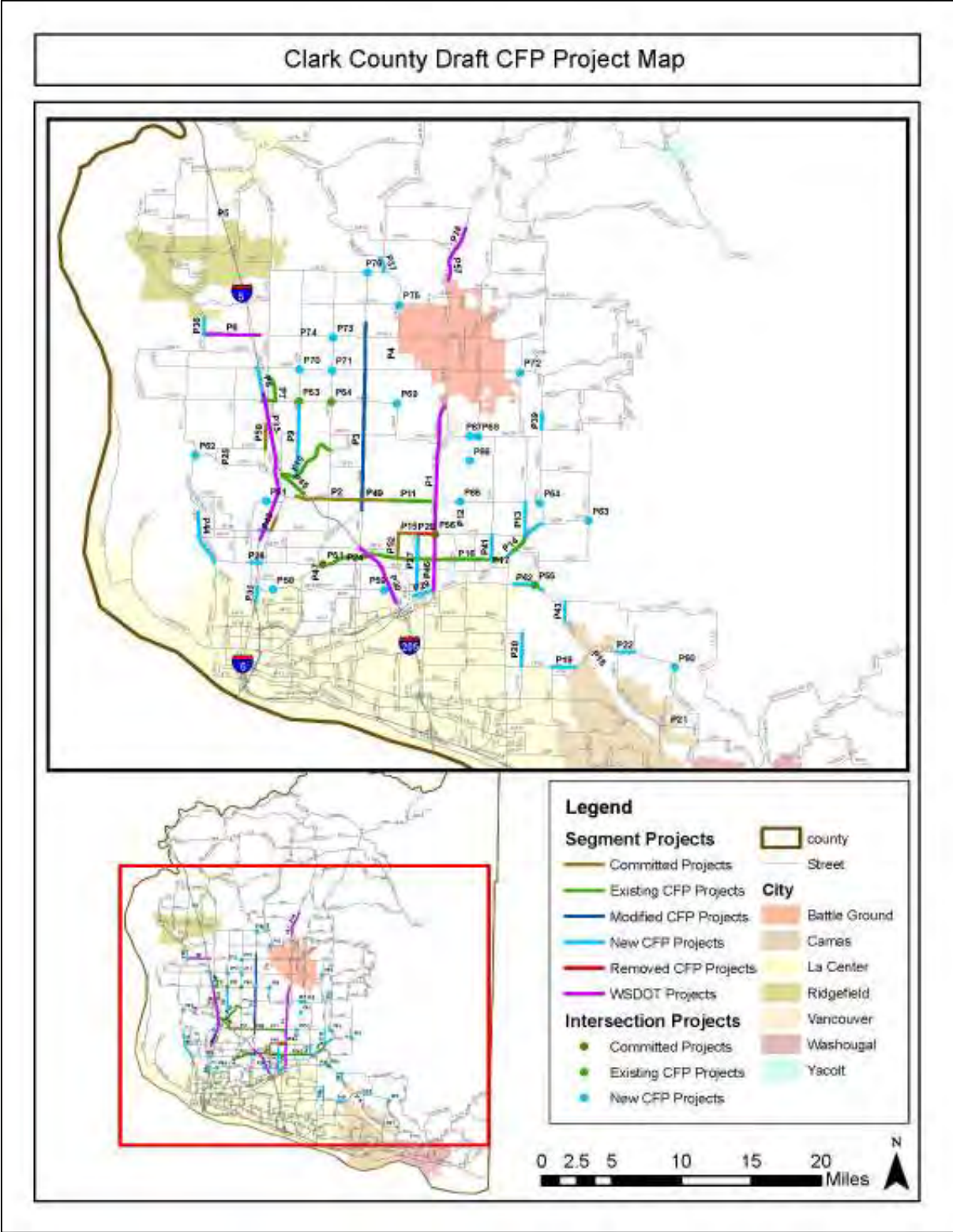


Figure 1. Draft Project List