Friends of Clark County
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friendsofclarkcounty.org

Friends of Clark County
Planting the Seeds of Responsible Growth

NOVEMBER 18, 2014

Community Planning Comprehensive Plan Alternatives
PO Box 9810 Vancouver, Washington 98666-9810

Subject: Comments on the 2016 Comprehensive Growth Management Plan Update Alternatives.
Sent via email to: comp.plan@clark.wa.gov

Dear Sirs and Madams:

Friends of Clark County (FOCC), supports and encourages a Public Utilities Zone that would include designated parks.

We, however, have two main objections, both with Alternative 2.

First objection is Alternative 2 (1). Consolidation of Comprehensive Plan land use designations. Bottom line is that these are not simple map clean ups.

Rural Lands.

Alternative 2(1) includes a proposal that "makes it easier to change from one minimum parcel size to another" for every rural parcel in Clark County. The BOCC would combine rural parcels of all minimum sizes into one Rural Designation. Somehow, this means that only a Type III Process is necessary to divide parcels instead of a legislative Type IV process.

We agree with Staff, that this proposal has a good chance of being rejected by the Growth Management Board. This is not a simple change. It is not just "housekeeping".

Combining rural parcels of all minimum sizes into one designation is a rewrite of the code in that it changes the process to divide rural parcels. Dividing parcels would take only a Type III rather than a Type IV Process. That means lower notification, lower analysis of environmental consequences, and going through the Hearings Examiner rather than the Planning Commission. The Hearings Examiner is a person appointed by the BOCC and uses criteria determined by the Growth Plan approved by the BOCC. This change in process is a change that would affect the whole county. At least, the proposal itself should have its own legislative level Type IV

process with a full EIS review of the effects on air, water, roads, population, ratio of urban to rural residences, etc. and analysis by the Planning Commission.

We support Staff concerns about this proposal. Because this change in process affects every rural parcel in the county, it is a change that would affect the whole county. Therefore it should, have the legislative level, Type IV evaluation that is meant for code changes that affect the whole county. Even then, there is a good chance that it would not be accepted.

We recommend that it be taken out of Alternative II.

Forest and Commercial Lands.

There are analogous problems for the consolidation of Forest Tier 1 and Forest Tier II into one Forest (F) designation and for combining Commercial Neighborhood, Community and General designations into one Commercial designation.

We recommend that the whole "Consolidation of Comprehensive Plan land use designations" section be removed from Alternative 2. At least until they have their own legislative level process.

The second objection is with the proposed decreases of minimum parcel size for Agricultural, Forestry and Rural minimum parcel sizes. This decreased the minimum size without changing the process for dividing the parcel. It is still problematic with the Growth Board because it is countywide and probably needs its own legislative process to analyze the wide-ranging effects on county water, roads, utilities, and urban/rural population distribution etc. Staff has some of these figures. To support staff we would ask for their data and consider it. Please listen to them when they offer possible ways to improve the chances for it to be accepted. If you must do it, then consider clustered houses WITH a title revision that secures the rest of the parcel as undivided rural or resource land in perpetuity.

Meanwhile, consider that Agriculture is not dead in Clark County.

Large lots are necessary for some things like raising meat (Inspiration Plantation and others). Newer crop such as vineyards need larger lots. The new non-GMO foods market may need crops from larger lots. Plant nurseries need larger lots.

Larger Ag lots have been selling as well as small ones. When dairies move to the Inland Empire, other kinds of agriculture come to replace them. Some of these will need larger parcels. Healthy local food will remain in demand. Even if we cannot grow all of our food, we can stay healthier if we grow some of it.

Sincerely,

Sydney Reisbick
President
Friends of Clark County

O'Donnell, Mary Beth

From: Bianca Benson <bianca@friendsofclarkcounty.org>
Sent: Tuesday, November 18, 2014 9:39 AM
To: Cnty 2016 Comp Plan
Cc: 'Sydney Reisbick'
Subject: Comments on the 2016 Comprehensive Growth Management Plan Update Alternatives.
Attachments: Alternative comments by Sydney.pdf

Please review and submit to record the following attachment.

Bianca Benson
Executive Director
Friends of Clark County
503.701.9203
visit our website