



Ashbaugh Beal

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CP16#0462

November 18, 2014

VIA EMAIL and U.S. MAIL

Commissioner Tom Mielke  
Commissioner David Madore  
Commissioner Edward L. Barnes  
Board of Clark County Commissioners  
P.O. Box 5000  
Vancouver, WA 98666-5000

RE: Comment on the Clark County Growth Management Plan Update Process

Dear Commissioners:

Thank you for the opportunity to provide formal comment on the Growth Management Plan update process. I present these comments on behalf of myself, my brother and my father, who both individually and collectively own different rural properties in Clark County. I am also certain that these comments are echoed by a vast number of voters in the rural areas that make up your respective constituencies.

Our primary objective in providing this comment is to ask that each of you ***in your roles as the deciding authority*** on the issue to add two new alternatives to the single alternative currently being considered for rural property designations. Of the three alternatives currently scheduled for analysis in the Supplemental Environmental Impact Statement (SEIS), one is status quo, and one applies to the La Center city limits only. ***Given this reality, there is really only one alternative for the rural properties***, an alternative strikingly similar to status quo. Given that the stated purpose of this extremely important process is to ***prepare for increased population and employment through 2035***, entertaining just one slightly different alternative to status quo falls well short of what would be expected from a good public policy standpoint, as well as the requirements of the Growth Management Act and the State Environmental Protection Act (SEPA).

Under the terms of SEPA, the staff is to present a ***reasonable number and range*** of alternatives to the Commissioners for consideration. WAC 197-11-440. Similarly, the EIS process (by the terms of the Washington Administrative Code and the Revised Code of Washington) is supposed to provide both the Commissioners and the public with ***sufficient information for a reasoned choice among alternatives***. *Solid Waste Alternative Proponents v. Okanogan County*, 66 Wn. App. 439, 442 (1992); see also WAC 197-11-440(5). One alternative, as currently proposed, hardly accomplishes this legislative and judicial intent and does not serve the rural voters of Clark County.

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Moreover, it is imperative that your staff provide you with the full spectrum of growth possibilities, not just actual population statistics or State projection guidelines to predict future growth. We have just endured what has been widely described as "the great recession"—clearly not something that should be expected to be repeated again in the next twenty years. As such, any statistics that do not account for this rare occurrence are skewed and need to be adjusted. If we take an accurate, balanced and honest look at the past twenty years, we can expect extraordinary growth in Clark County in the twenty years to come.

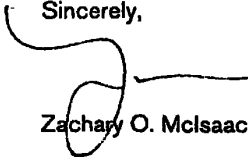
**You are in charge of this important analysis, and you have the authority and responsibility vis-à-vis your constituency to direct a neutral, realistic, and balanced analysis of possibilities!**

It is my understanding that Clark County Citizens United has proposed two alternatives that account for the realities outlined above and that provide the "reasonable range" of alternatives necessary to allow for a "reasoned choice" as required by Washington law. Without attempting to recite the specifics of those alternatives in this letter, it is my understanding that Alternative 4 reasonably and appropriately expands changes to rural designations detailed in Alternative 3 (the only current alternative), and Alternative 5 presents a "pro-growth" approach that deserves equal consideration given the tremendous growth we have seen in Clark County over the last twenty years.

Commissioners should direct staff to include two new hearings at one of their public meetings by the end of the year where consideration of these two alternatives is a specific agenda item to be discussed.

I trust that these comments will not fall on deaf ears, and look forward to the Commissioners exercising their inherent authority to ensure that this process results in a reasoned and fair update to the Growth Management Plan in 2016.

Sincerely,



Zachary O. McIsaac

ZOM:tm

c: County Administrator Mark McCauley

**O'Donnell, Mary Beth**

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**From:** Mielke, Tom  
**Sent:** Wednesday, November 19, 2014 4:59 PM  
**To:** 'Teresa MacDonald'; Madore, David; Barnes, Ed  
**Cc:** Cnty Board of Commissioners General Delivery; Cnty 2016 Comp Plan  
**Subject:** RE: Clark County Growth Management Plan Update Process

Ms. McDonald,

We started our process about 9 mos. ago and had several alternatives to consider and accept for our estimated growth to plan for. If I understand you correctly we did at that time have at least three choices.

Hope this helps,  
Tom

**From:** Teresa MacDonald [<mailto:TMacDonald@ashbaughbeal.com>]  
**Sent:** Tuesday, November 18, 2014 3:31 PM  
**To:** Mielke, Tom; Madore, David; Barnes, Ed  
**Cc:** Cnty Board of Commissioners General Delivery; Cnty 2016 Comp Plan  
**Subject:** Clark County Growth Management Plan Update Process

Please see the attached letter from Zachary O. McIsaac commenting on the Clark County Growth Management Plan update process. Copies will follow by U.S. Mail.

**TERESA MacDONALD**  
Legal Assistant to John Riper, Jesse Miller, Zak McIsaac and Michael Richard



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