Please see the attached comments on the Draft EIS for the comprehensive growth management plan update. Thank you.

Gretchen Starke
Friends of Clark County
November 17, 2014

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

Dear Sirs and Madams:

Subject: Comments on the 2016 Comprehensive Growth Management Plan Update Alternatives.

First, before criticizing aspects of Alternative 2, we would like to express our approval of the idea of designating special zones for providing public facilities, including parks. This is far sighted and would be good for both the taxpayer and the eventual user of the facility.

However, the idea of having the same level of review for the division all parcels, whatever the size and location, in the rural zone is troubling. This proposal is more than a "clean up." It is a wholesale change in handling land division in the Rural Zone. As to the idea of "simplifying" land divisions, yes, it would do that. But, from the view point of the taxpayer and considering the future of the county, is that really desirable? Our contention is that it is not.

The purpose of the Growth Management Act is to prevent the sort of sprawl that this proposal would encourage. Under the shortened review of Level III, the cumulative effects of all those land divisions would be virtually ignored. Eventually, throughout the Rural Zone there would be five acre lots, each one considered in its own little bubble and created as if there would be no effect on its neighbors or the future of the county as a whole. Where would be the adequate consideration for increased traffic, for the adequacy of the water supply, the disposal of solid waste, the needs for police and fire protection services? Habitat protection, conserving agriculture, preventing pollution of our streams and rivers, all could be given short shrift under the Review III that is proposed.

The result would be a mess, neither rural nor urban. Wall to wall five acre lots do not make a truly rural area. Because public services cannot be provided efficiently to an area of five
acre lot after five acre lot, they would decline. Make no mistake, people want these public services, the amenities of civilization. Or taxes would go up. Or both would occur.

These are good and valid reasons to slow things down as the county becomes more and more developed. The needs of the people -- those here now and those yet to be born -- must take precedent over the desires of a particular land owner or developer.

But the thing that is most disturbing about this proposal to throw all Rural Zone land divisions, whatever the size, into the same Review Level III bucket, is that it is being incorporated into the update of the Growth Management Plan. To consider a change that would result in increased density in the Rural Zone as being merely just one of a few "cleanup, standardizing, and simplifying details" could confuse and mislead the public. Any series of land divisions that would increase density in the Rural Zone, as this proposal would do, should not be encouraged by making it easier. Dividing your land into smaller lots should be difficult.

No, the commissioners should tell the staff to take that proposal out of Alternative 2. If, for whatever reason, this proposal is wanted, it should be considered apart from the update of the comp plan. It should be presented to the public on its own and thoroughly explained. There should be a thorough discussion of all the issues involved -- traffic, quality and quantity of water, costs of providing electricity, loss of habitat and open space, among other issues. Further and most important, this proposal must undergo its own environmental review on its own complete with an analysis of cumulative effects.

Please refer to the other comments submitted by Friends of Clark County. Please enter this into the record. I wish to be a party of record and receive all information on the update of the comp plan.

Gretchen Starke
Friends of Clark County,
Board Member

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