



Rec'd 4-14-15 from Brent Grening

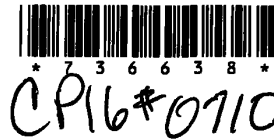
COI - Ball Oriako O'Bonnell

Scott Hughes, Commissioner
Joe Melroy, Commissioner
Bruce Wiseman, Commissioner

Brent Grening, Chief Executive Officer

April 13, 2015

Clark County Board of County Commissioners
Attn: David Madore, Chair
P.O. Box 5000
Vancouver, WA 98666-5000



RE: GMA Update Alternative 4 – Rural and Resource Lands Changes

Dear Chairman Madore and County Councilors:

The Port of Ridgefield Commission thanks you for your work to spur economic development, promote job growth and create opportunities in Clark County. Thank you also for holding a community open house in Ridgefield on March 25, - this was an excellent opportunity for citizens in North Clark County to learn more about the GMA process and to review Alternative 4.

The Port of Ridgefield is concerned that Alternative 4 may have significant negative impacts on the economic potential of the unincorporated lands surrounding Ridgefield and in the area between Ridgefield and La Center.

Changes in zoning from Agricultural 20 to ten or five acre minimums could lead to parcelization of large properties. Small lot sizes will encourage residential development in the unincorporated area around Ridgefield and I-5 in the area commonly referred to as the Discovery Corridor. Smaller parcel size and residential development make industrial/employment development more difficult, time consuming and expensive. Residential opposition to industrial/commercial development can make employment based development unfeasible and drive investors to regions or states where such conflicts are better managed.

Taken together, this could significantly limit the area's potential for job growth and economic development. We support alternatives that conserve large parcels in North Clark County for economic development and job creation because employment land is a critical and necessary component for achieving both the County's as well as the Port of Ridgefield's economic development goals.

The Discovery Corridor is recognized as having some of the largest acreages of land suitable for industrial and employment development remaining in Clark County. Millions of public dollars have been spent in infrastructure improvements to support economic and job development including the 219th and Ridgefield interchanges and the regional sewer system improvements. Conserving large parcels for industrial, commercial and employment development is the best way for the public to maximize its investment in infrastructure.

If the County chooses to move Alternative 4 forward, we ask that the impacts to the economic and job development potential of the area in and around the Discovery Corridor be thoroughly analyzed and considered.

Thank you for your consideration,

Brent A. Grening
CEO

Rec'd 4/15 from Gretchen Starke

CC'd = BOCC
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O'Donnell

VANCOUVER AUDUBON SOCIETY

P.O. Box 1966 Vancouver, WA 98668-1966
www.vancouveraudubon.org



Statement to the County Council on the Proposed Alternative 4 for the Update of the County Growth Management Plan April 14, 2015

My name is Gretchen Starke and, as conservation chair, I am speaking on behalf of the Vancouver Audubon Society. As a resident of Clark County for the past 47 years and as one who cares about this place, I am also speaking for myself.

Audubon's focus is birds and protection of their habitat. Thus, we are concerned about the growth management plan and the integrity of habitat for birds and other wildlife, including fish and invertebrates. As such, in order to be able to adequately participate in the governing process of such growth plan development, we understand that having the county provide for open and continuous public participation is of paramount importance. Such public outreach and participation must include all segments of the population, urban as well as rural, because all residents of the county will be affected by the changes in the comprehensive growth plan. Whether we lose access to locally grown fruit and vegetables or lose the benefits of the open space of forests and farms, or whether we pay more in taxes to serve a huge increase in population in the rural areas or lose public services because of the lack of sufficient resources to serve the county population, we will all pay. Therefore, we must all be given an opportunity to participate in the development of the growth plan, including all of the alternatives.

I will add that the community planning staff must be involved in all aspects of development of the alternatives. They are the trained professionals, they understand the implications of each decision and they understand the requirements of the Growth Management Act.

So. Has there been open and continuous public participation in the formation of the 4th alternative? Absolutely not! Has the planning staff been involved in the development of the 4th alternative? No.

In the summer of 2014, the county began the update of the county comprehensive growth plan. In addition to the no-change alternative, legally required under the State Environmental Policy Act, two alternatives were proposed. Because the changes under the two proposed alternatives were relatively minimal, county staff suggested that a supplemental environmental impact statement (SEIS) be prepared, rather than a full-blown EIS. The county approved a timeline, such timeline then being made known to the public. The county hired a consultant to prepare the draft SEIS (DSEIS). There were open houses at which the three alternatives were presented to the public. Throughout the summer and fall, the process continued as it should.

At a January 2015 work session that I attended, staff presented the progress on the growth plan update. The consultant was almost finished with preparing the DSEIS and it was to be presented to the public at a joint planning commission-county councilor meeting within the next

two weeks. Staff then asked the counselors to approve an updated timeline. Councilor Madore refused to approve the timeline. Clear out of the blue, Councilor Madore presented a 4th "option," as he called it. The staff was stunned. They had, had no part of this. After much discussion, Madore told staff to tell the consultant to stop work on the DSEIS.

From that time until now, Madore has had complete control of the process. He created the map with no consultation or input from the planning staff. He did, however, consult frequently, with the members of a group called Clark County Citizens United. This is a small group of people, mostly in the north county, who want to subdivide their land. In this situation, members of the public at large, those who have different interests and needs and who might have had a different perspective had no practical way to offer their points of view or to observe the process of creating the alternative 4. Staff didn't know the details of what was going on. The citizens, other than CCCU, would have had to go knock on Madore's door to get a look at the work in progress.

There was a work session in March that I attended. In a work session, the staff usually presents material to the council to explain progress being done on the issue in question and to ask for direction in proceeding. At this work session, it was Madore who presented alternative 4 to the staff. And to the city representatives and the few members of the public present. Again, to emphasize, staff had nothing to do with this alternative. And, a member of CCCU was specifically invited to sit at the table with the councilors and the staff.

After that work session and before this hearing there were two open houses. The staff had done no analysis of the alternative because they had no details of the alternative. My interests would have been impact on habitat, but there was -- is -- no way to tell because all the map consists of is blotches of three different shades of yellow. In a bizarre turn of events, between the open houses, a map differing from the one presented at the first open house appeared on the county website. Planning staff did not put it there. After intervention by the staff, the ringer map was yanked from the website and replaced by the one that had been presented at the first open house. Any member of the public would be justified in wondering what exactly alternative 4 is.

To sum up: the county is violating the law by not providing for early, open, and extensive public participation and by giving special attention to one, small, special interest group to exclusion of considering the effects of alternative 4 on others. The county is also violating its own precedent by not having the staff thoroughly vet the alternative. Because of the lack of any analysis, the county has failed to allow the public to understand the effects of alt 4. This, plus the suddenness of the introduction of alternative 4, did not give the public, aside from the favored few, any chance to give meaningful comment or input.

The county has further violated precedent, not to mention ordinary good planning and management, by having persons with no planning training or experience create this alternative. Even worse, Councilor Madore will be voting on including alternative 4 in the plan for analysis when he, in effect, created it.

That there will be considerable environmental impacts from alternative 4 is obvious from looking at the map with the yellow blotches. Those blotches appear to go up into the foothills in the NE part of the county. But, absent analysis, the extent and details of those impacts cannot be determined. The county would do well to drop any further consideration of alternative 4 -- flawed in both the substance and process -- and select Alternative 1 as the preferred alternative.

Thank you.