

Schroader, Kathy



From: Orjiako, Oliver
Sent: Monday, August 24, 2015 12:34 PM
To: Euler, Gordon; Alvarez, Jose
Cc: Schroader, Kathy
Subject: FW: It is critical to get the d. EIS right; demand perfection

FYI and for index. Thanks.

Oliver

From: Carol Levanen [mailto:cnldental@yahoo.com]
Sent: Wednesday, August 19, 2015 11:42 PM
To: Stewart, Jeanne; Mielke, Tom; Madore, David; Orjiako, Oliver
Subject: Fw: It is critical to get the d. EIS right; demand perfection

----- Forwarded Message -----

From: susan rasmussen <sprazz@outlook.com>
To: Carol Levanen <cnldental@yahoo.com>; susan rasmussen <sprazz@outlook.com>
Sent: Tuesday, August 18, 2015 6:32 AM
Subject: Re: It is critical to get the d. EIS right; demand perfection

The draft EIS contains many gaping holes and inconsistencies..

- _ 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.
DEIS, Pg. 5-1
"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."

In addition, Clark County has a long-standing "right to farm" ordinance that addresses these issues.

Pg. 6-3:

"Most northern Clark County remains in rural use, with some resource-based industries."

- _ 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
"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."

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.

_ 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 or 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

"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.

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.

_ 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:

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.

Pg. 11 Land use Description graph: Forestry operations---103 parcels, 61 owners, 25.7 average size
Unused land timbered--297 parcels, 232 owners, 9.1 average size
Unused land cleared---1,077 parcels, 756 owners, 8.0 average size

_ 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

From: Carol Levanen,

Sent: Monday, August 17, 2015 8:03 PM

To: Carol Levanen, susan rasmussen

http://www.clark.wa.gov/planning/land_use/documents/cara/wetlands-adopted-ord.pdf