In my previous comments on the 2016 Comprehensive Plan, I have expressed my concerns about Alternative 2 and Alternative 4. Now that more detail has been provided in the Draft SEIS, I am even more concerned about the proposed reduction of minimum lot sizes in rural, agriculture, and forest zones, which will result in more subdivision of parcels outside of the urban growth areas. With over 7,000 new rural lots in Alternative 1-No Action, there is already ample opportunity for development outside urban growth areas. I see no need for the additional lots proposed in Alternative 2 and 4, nor do I see anything in the Draft SEIS that explains why this is necessary. The planning assumptions in the Draft SEIS, such as 90% of new population growth in urban areas and 10% in rural areas and the number of new dwelling units, and the principles and values adopted by the Board of County Councilors do not support the increase in rural area development. I have also not heard any reason other than “we want to be able to sell some of our property” in comments by others who support Alternative 2 and 4.

I understand the desire of some of the County Councilors to be responsive to those who think they are not being allowed to do what they want on their land. But at what cost to most Clark County residents in higher taxes or reduced services, environmental impacts, and quality of life? As stated in the Draft SEIS, the infrastructure cost for transportation could be prohibitive. Costs to utilities, cities, and school districts to provide service to the surrounding rural development will also increase. I’m concerned about the impact on water quantity and quality of more rural wells and septic tanks, and more impervious surfaces (roads, driveways, etc.). There also will be significant impacts to resources that are required to be protected, such as agricultural land, fish and wildlife, and other natural resources if the lot size reductions in Alternative 2 and 4 are approved.

Clark County has made a lot of progress in how land is developed in the past twenty years, resulting in reduced costs and impacts, and I do not want to see that progress reversed by allowing more development on rural lands outside of the urban growth areas. Some argue that because others nearby were able to subdivide their property prior to the Growth Management Act they should be allowed to do the same. But the Growth Management Act was passed to stop exactly that type of expensive development outside of cities and the resulting sprawl and parcelization of rural and resource lands. Allowing smaller lot sizes as proposed in Alternative 2 and 4 does not meet the goals or requirements of the Growth Management Act.

Tables showing new parcels/acreage affected are helpful in understanding the impact of the alternatives but they need to be cleaned up so the “potential acreage affected” totals are calculated and displayed correctly (Table 3-2 and 3-4 for example).

I strongly support Alternative 1 since there is no need to increase the number of lots available to develop in Clark County based on the current population and job projections. I accept that some of the changes in Alternative 2 to city urban growth areas and in Alternative 3 that were requested by the cities may be necessary, assuming those changes can truly be justified and are not on resource lands of long-term commercial significance, such as prime soils. I strongly disagree with the proposals in Alternative 2 and Alternative 4 to reduce minimum lot sizes.

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