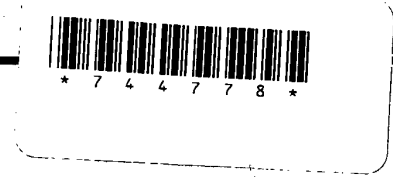


**Schroader, Kathy**

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**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 2:58 PM  
**To:** Euler, Gordon; Alvarez, Jose; Anderson, Colete  
**Cc:** Schroader, Kathy  
**Subject:** FW: Final comment on DSEIS and other issues  
**Attachments:** DSEIS GMP CCCU input 9 17 15-DTM.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

FYI and for the record. Thanks.

-----Original Message-----

**From:** Sydney Reisbick [mailto:[reisbicks@comcast.net](mailto:reisbicks@comcast.net)]  
**Sent:** Thursday, September 17, 2015 2:57 PM  
**To:** Orjiako, Oliver  
**Subject:** Final comment on DSEIS and other issues

Mr Ojiako:  
Please accept my comments for the record re the DSEIS and GMA process.  
Thank you,  
Sydney Reisbick

Board of County Commissioners  
Clark County Planning Commission  
Community Planning Staff  
c/o Oliver Orjiako, Community Planning  
1300 Franklin St  
Vancouver, WA 98660

Sydney Reisbick  
PO Box 339  
Ridgefield, WA 98642

9/17/15

## DSEIS and Capital Facilities

Input for the Draft Supplemental Environmental Impact Statement (DSEIS), for the 2016 Growth Management Plan (GMP) Alternatives for the Comprehensive Plan. Please accept this input for the Record.

The bottom line is that the Draft Supplemental Environmental Impact Statement (DSEIS) is both (**delete "both"**) not qualitative and (**add a comma after qualitative and delete "and"**) not complete and is an inadequate basis for making a preferred plan. Any Final Alternative which proposes county-wide changes in zoning changes or minimum lot size changes should have a full EIS as well as a new capital facilities plan (CFP).

The DSEIS fails to discuss all the qualitative effects of the alternatives on the environment and rural character (Tim Trohimovich). It does not provide quantitative analysis of any of the alternative's impacts on water (streams, aquifers and wells or sewers), wildlife and fish habitat, resource lands (protection and use there of), infrastructure (traffic trips, utility services), human health (physical and mental), affordable housing, or transit. The DSEIS does not quantify these effects of the alternatives on cities, rural centers or rural life (See David McDonald and Tim Trohimovich; See FOCC member's individual input on many of these). Proposed mitigations are fuzzy or potentially inadequate (same sources) and may not be enforced.

It is very expensive to build the capital facilities that will be needed by any Final Alternative. We are way behind in building those necessary for the growth projected in Alternative 1. The estimated cost of capital facilities for growth in the Alternative (See 2007 Capital facilities Plan) was between \$900 million and one billion dollars. We, the taxpayers, ratepayers, and bond interest-payers, will pay for much of this construction and mediation. We deserve a serious estimation of the cost of these alternatives.

Further costs will come from submitting an alternative that is not congruent with the goals of the state Growth Management Act.

Alternative 1

Alternative 1 is congruent **(in compliance not concurrent)** with the goals of the Growth Management Act.

There is no court case with which it is not concurrent **(in compliance not concurrent)**

There is no GMA case with which it is not concurrent **(in compliance not concurrent)**. (See David McDonald for FOCC).

Alternative 1 is not “no growth”. It is growth adequate for expected population growth **that we can afford**. There are sufficient rural **(delete rural)** parcels in both the urban and the rural areas. There are more than enough parcels in the rural area to support a 10/90% urban rural population split.

Alternative 1 has a full EIS and a Capital Facilities Plan **and is not clear whether the County’s current CFP meets GMA concurrency requirements, much less is funded to complete the mandated projects.**

If the Final Alternative proposes growth greater than that in Alternative 1, especially in the rural areas, and especially with countywide changes in zoning and minimum lot sizes, both a full EIS and a new CFP must be done.

## CCCU Issues

CCCU appeal issues have already been resolved by both **(delete both)** the WWGMHB, **the County** and the courts (See David McDonald, submitted 9/14/15).

Property rights: Property rights, as defined by the courts, are security of the right to use your land, not to divide it. If these bodies had ruled that property rights meant that you **individual property rights were being violated**, then people **would be suing the county to allow for them to divide and sell** their lands.

Variety in sizes of rural lots: In Alternative 1, Clark County has an approved variety of rural parcel sizes: Regular rural area has parcels of 20, 10 and 5 acres. Rural centers have lots of 1.5, 2.5 and 5 acres. Further, a court just ruled in a Kittitas County appeal that 3 acres are not rural because they could not demonstrate that 3-acre parcels would maintain rural character (Ed Bane, Supreme Court of Washington, Feb. 23, 2015.)

Definition of farmland in farming zone: CCCU has held that only classes 1 and 2 of farm soils should be considered for farming zones and has shown maps that show zones larger than those two classes of farmland. However, the past maps have been based on using **all appropriate soli classes** and those classes are entirely congruent with the current zones, and this has been approved for Alternative 1 (See David McDonald, map input for FOCC).

CCCU has not been shut out of the process, as they have been involved from the very beginning (David McDonald, submitted 9/14/15).

The rural area has not been frozen for 20 years. On the average over 20 years, Clark County has been issuing over 600 new building permits a year. They have lowered the rural minimum lot size to 5 acres for one zone. A cluster ordinance has been added. Code has been added for wineries, kennels and worker housing. The County has allowed detached Guest Houses. A proposal for an Alternative Access Dwelling Unit (not combined with a guest house) is in discussion.

Again, the bottom line is that the Draft Supplemental Environmental Impact Statement (DSEIS) is both not complete and not qualitative. It is an inadequate basis for making a preferred plan. Further, any Final Alternative, that proposes countywide changes in zoning or minimum lot size changes, is not congruent with the goals of the GMA. Any such plan must have a full EIS as well as a new capital facilities plan (CFP).

**Schroader, Kathy**

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**From:** Orjiako, Oliver  
**Sent:** Thursday, September 17, 2015 3:36 PM  
**To:** Euler, Gordon; Alvarez, Jose; Anderson, Colete  
**Cc:** Schroader, Kathy  
**Subject:** FW: Oops. Final comment on DSEIS and other issues  
**Attachments:** Final DSEIS GMP CCCU input 9 17 15-DTM-2.doc

FYI. Look like an update comment. Thanks.

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**From:** Sydney Reisbick [<mailto:reisbicks@comcast.net>]  
**Sent:** Thursday, September 17, 2015 3:14 PM  
**To:** Orjiako, Oliver  
**Subject:** Fwd: Oops. Final comment on DSEIS and other issues

Oops. May I please replace the one I sent with the corrected one?

It is below this line.

Begin forwarded message:

>

Board of County Commissioners  
Clark County Planning Commission  
Community Planning Staff  
c/o Oliver Orjiako, Community Planning  
1300 Franklin St  
Vancouver, WA 98660

Sydney Reisbick  
PO Box 339  
Ridgefield, WA 98642

9/17/15

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The DSEIS fails to discuss all the effects of the alternatives on the environment and rural character (Tim Trohimovich). It does not provide quantitative analysis of any of the alternative's impacts on water (streams, aquifers and wells), stormwater/septic tanks, wildlife and fish habitat, resource lands (protection and use there of), infrastructure (traffic trips, utility services), human health (physical and mental), affordable housing, or transit. The DSEIS does not quantify these effects of the alternatives on cities, rural centers or rural life (See David McDonald and Tim Trohimovich; See FOCC member's individual input on many of these). Proposed mitigations are fuzzy or potentially inadequate (same sources) and may not be enforced.

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Further costs will come from submitting an alternative that is not congruent with the goals of the state Growth Management Act.

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There is no GMA case with which it is not in compliance. (See David McDonald for FOCC).

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