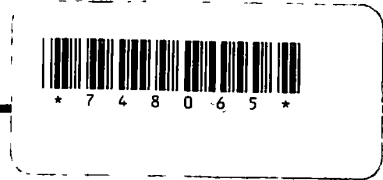


**Schroader, Kathy**



**From:** Orjiako, Oliver  
**Sent:** Wednesday, October 21, 2015 8:17 AM  
**To:** Euler, Gordon, Alvarez, Jose; Anderson, Colete, Albrecht, Gary  
**Cc:** Schroader, Kathy  
**Subject:** FW: Comments on the SEIS preferred alternative for Oct 20 public hearing  
**Attachments:** WRIA 27-28 Reservations ESTIMATES w Totals for Clark County by Category.xlsx, WRIA 27-28 Reservations ESTIMATES.xlsx, Futurewise Comments on Comp Plan Preferred Alt Oct 16 2015 Corrected.pdf

FYI and please for the record Thanks.

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**From:** Cnty Board of County Councilors General Delivery  
**Sent:** Tuesday, October 20, 2015 11:51 AM  
**To:** Mielke, Tom; Madore, David; Stewart, Jeanne  
**Cc:** Tilton, Rebecca; Orjiako, Oliver  
**Subject:** FW: Comments on the SEIS preferred alternative for Oct 20 public hearing

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**From:** Tim Trohimovich [<mailto:Tim@futurewise.org>]  
**Sent:** Friday, October 16, 2015 6:00 PM  
**To:** Cnty Board of County Councilors General Delivery; Cnty 2016 Comp Plan  
**Subject:** FW: Comments on the SEIS preferred alternative for Oct 20 public hearing

Dear Sirs and Madams:

The letter I just sent you, omitted a sentence and reference on page 4. Please substitute this version of the letter. I apologize for any confusion. The maps in the second email I sent are correct as are the enclosed spreadsheet.

**Tim Trohimovich, AICP**  
Futurewise | Director of Planning & Law  
816 Second Avenue, Suite 200 | Seattle, Washington 98104  
p 206 343 0681 Ext 118  
Email [tim@futurewise.org](mailto:tim@futurewise.org)

**25** YEARS **futurewise**

Building Communities & Protecting the Land

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**From:** Tim Trohimovich  
**Sent:** Friday, October 16, 2015 5:38 PM  
**To:** 'boardcom@clark.wa.gov' <[boardcom@clark.wa.gov](mailto:boardcom@clark.wa.gov)>; 'comp plan@clark.wa.gov' <[comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)>  
**Subject:** Comments on the SEIS preferred alternative for Oct 20 public hearing

Dear Sirs and Madams:

Enclosed please find Futurewise's comments on the Planning Commission's Sept. 17 recommendation of the preferred alternative for the county's next growth management plan which is the subject of the Clark County Board of County Councilors' October 20<sup>th</sup> public hearing.

Several enclosures are included in the same PDF as the letter and included with this email as Excel spreadsheets. In a second email we will include the reference maps of the water reserves.

Please contact me if you require anything else.

**Tim Trohimovich, AICP**

Futurewise | Director of Planning & Law

816 Second Avenue, Suite 200 | Seattle, Washington 98104

p 206 343 0681 Ext. 118

Email [tim@futurewise.org](mailto:tim@futurewise.org)



WRIA 27-28 as of June 2015

	Reservation Benefit (CFS)	Households Served	New Water Wells (ecy)	Public est* systems(doh)	CFS Permitted	TOTAL	RESERVATION % Used	Remaining Household Capacity	
<b>Kalama River Subbasin</b>									
Kalama	1.92	1551				0	0.0%	1,551	
Small Community Water Systems - Cowlitz Co	0.37	299		1		1	0.3%	298	
Domestic Wells - Cowlitz Co NA 141 0 52 0 16 0 00 0 16	0.16	432		48		48	11.1%	384	
<b>North Fork Lewis River Subbasin</b>									
Small Community Water Systems - Cowlitz Co	0.37	299		1		1	0.3%	298	
Small Community Water Systems - Clark Co	0.75	606		3		3	0.5%	603	
Small Community Water Systems - Skamania Co	0.4	323		0		0	0.0%	323	
Domestic Wells - Cowlitz Co	0.07	189		82		82	43.4%	107	
Domestic Wells - Clark Co	0.12	324		81		81	25.0%	243	
Domestic Wells - Skamania Co	0.4	1080		0		0	0.0%	1,080	
Commercial - Skamania County -	0.21			0		0		0	
Ridgefield (Not applicable, due to location in tidally influenced area (8))								0	
<b>East Fork Lewis River Subbasin</b>									
CPU, Battle Ground and Ridgefield	4.4	3554				0.67	0	15.2%	3,554
Small Community Water Systems - Clark Co	0.37	299		2	19		21	7.0%	278
Small Community Water Systems - Skamania Co	0	0		0		0	0.0%	0	
Domestic Wells - Clark Co	0.47	1269		122		122	9.6%	1,147	
Domestic Wells - Skamania Co	0.02	54		0		0	0.0%	54	
<b>Salmon Creek Subbasin</b>									
CPU, Battle Ground and Ridgefield	0.25	202		7		7	3.5%	195	
Small Community Water Systems - Clark Co	0	0		0		0		0	
Domestic Wells - Clark Co	0.12	324		92		92	28.4%	232	
<b>Burnt Bridge Creek Subbasin</b>									
Vancouver	0	0		0		0	0.0%	0	
Small Community Water Systems - Clark Co	0	0		0		0	0.0%	0	
Domestic Wells - Clark Co	0	0		0		0	0.0%	0	
<b>Lacamas Creek Subbasin</b>									
Camas	1	808				0	0.0%	808	
Clark Public Utilities (CPU)	0.6	485				0	0.0%	485	
Small Community Water Systems - Clark Co	0.37	299		3	8	11	3.7%	288	
Domestic Wells - Clark Co NA	0.17	459		71		71	15.5%	388	
<b>Washougal River Subbasin</b>									
Washougal	0	0				0	0.0%	0	
Small Community Water Systems - Clark Co	0.37	299			10	10	3.3%	289	
Small Community Water Systems - Skamania Co	0.2	162				0	0.0%	162	
Domestic Wells - Clark Co	0.17	459		32		32	7.0%	427	
Domestic Wells - Skamania Co	0.64	1728		26		26	1.5%	1,702	
<b>Columbia River Tributaries Subbasin</b>									
Small Community Water Systems - Clark Co	0.21	170		0		0	0.0%	170	
Small Community Water Systems - Skamania Co	0.21	170		3		3	1.8%	167	
Domestic Wells - Clark Co	0.12	324		14		14	4.3%	310	
Domestic Wells - Skamania Co	0.12	324		10		10	3.1%	314	
<b>Total</b>	<b>14.58</b>	<b>16,490</b>						<b>15,855</b>	
<b>Cities in Clark County</b>									
CPU for Cities								808	
Clark Public Utilities (CPU)								3,749	
Small Community Water Systems - Clark Co								485	
Domestic Wells - Clark Co								1,627	
Total Outside Cities								2,747	
								4,859	

WRIA 27-28

	Reservation Benefit (CFS)	Households Served	New Water Wells (ecy)	Public est* systems(doh)	CFS Permitted	TOTAL	RESERVATION % Used
<b>Kalama River Subbasin</b>							
Kalama	1.92	1551				0	0.0%
Small Community Water Systems - Cowlitz Co.	0.37	299	1			1	0.3%
Domestic Wells - Cowlitz Co. NA 141 0.52 0.16 0.00 0.16	0.16	432	48			48	11.1%
<b>North Fork Lewis River Subbasin</b>							
Small Community Water Systems - Cowlitz Co.	0.37	299	1			1	0.3%
Small Community Water Systems - Clark Co.	0.75	606	3			3	0.5%
Small Community Water Systems - Skamania Co.	0.4	323	0			0	0.0%
Domestic Wells - Cowlitz Co.	0.07	189	82			82	43.4%
Domestic Wells - Clark Co.	0.12	324	81			81	25.0%
Domestic Wells - Skamania Co.	0.4	1080	0			0	0.0%
Commercial - Skamania County	0.21		0			0	
Ridgefield (Not applicable, due to location in tidally influenced area. (8)							
<b>East Fork Lewis River Subbasin</b>							
CPU, Battle Ground and Ridgefield	4.4	3554			0.67	0	15.2%
Small Community Water Systems - Clark Co.	0.37	299	2	19		21	7.0%
Small Community Water Systems - Skamania Co.	0	0	0			0	0.0%
Domestic Wells - Clark Co.	0.47	1269	122			122	9.6%
Domestic Wells - Skamania Co.	0.02	54	0			0	0.0%
<b>Salmon Creek Subbasin</b>							
CPU, Battle Ground and Ridgefield	0.25	202	7			7	3.5%
Small Community Water Systems - Clark Co.	0	0	0			0	
Domestic Wells - Clark Co.	0.12	324	92			92	28.4%
<b>Burnt Bridge Creek Subbasin</b>							
Vancouver	0	0	0			0	0.0%
Small Community Water Systems - Clark Co.	0	0	0			0	0.0%
Domestic Wells - Clark Co.	0	0	0			0	0.0%
<b>Lacamas Creek Subbasin</b>							
Camas	1	808				0	0.0%
Clark Public Utilities (CPU)	0.6	485				0	0.0%
Small Community Water Systems - Clark Co.	0.37	299	3	8		11	3.7%

Domestic Wells - Clark Co. NA	0.17	459	71	71	15.5%
<b>Washougal River Subbasin</b>					
Washougal	0	0		0	0.0%
Small Community Water Systems - Clark Co.	0.37	299	10	10	3.3%
Small Community Water Systems - Skamania Co.	0.2	162		0	0.0%
Domestic Wells - Clark Co.	0.17	459	32	32	7.0%
Domestic Wells - Skamania Co.	0.64	1728	26	26	1.5%
<b>Columbia River Tributaries Subbasin</b>					
Small Community Water Systems - Clark Co.	0.21	170	0	0	0.0%
Small Community Water Systems - Skamania Co.	0.21	170	3	3	1.8%
Domestic Wells - Clark Co.	0.12	324	14	14	4.3%
Domestic Wells - Skamania Co.	0.12	324	10	10	3.1%
<b>Total</b>	<b>14.58</b>	<b>16,490</b>			



October 16, 2015

The Honorable Tom Mielke  
The Honorable David Madore  
The Honorable Jeanne E. Stewart  
Clark County Board of County Councilors  
PO Box 5000  
Vancouver, Washington 98666-5000

Dear Councilors Mielke, Madore, and Stewart:

**Subject: Comments on the Planning Commission's Sept. 17 recommendation of the preferred alternative for the county's next growth management plan.**  
Sent via email to: [boardcom@clark.wa.gov](mailto:boardcom@clark.wa.gov); [comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)

Thank you for the opportunity to comment on the on the Planning Commission's Sept. 17 recommendation for the preferred alternative for Clark County's next growth management plan. In short, we support the Planning Commission recommendation with two changes. This alternative meets community needs with the lowest cost. We urge you to designate it as the preferred alternative for the *Final Supplemental Environmental Impact Statement for the Clark County 2016 Comprehensive Growth Management Plan Update*.

Futurewise is working throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations. We work with communities to implement effective land use planning and policies that prevent waste and stop sprawl, provide efficient transportation choices, create affordable housing and strong local businesses, and ensure healthy natural systems. We are creating a better quality of life in Washington State together. We have members across Washington State including Clark County.

### **Why we support the Planning Commission Recommendation**

***The Planning Commission recommendation will save taxpayers and ratepayers money***

Compact urban growth areas (UGAs) saves taxpayers and ratepayers money. In a study published in a peer-reviewed journal, John Carruthers and Gudmaundur Ulfarsson

analyzed urban areas throughout the United States including Clark County.<sup>1</sup> They found that the per capita costs of most public services declined with density and increased where urban areas were large.<sup>2</sup> Compact urban growth areas save taxpayers and ratepayers money.

Conserving farm and forest land also saves taxpayers money. Farm and forest land pays more in taxes than it requires in public services. For every dollar farm or forest land pays in taxes it only requires 35 cents in public services. For every dollar residential development pays in taxes, it requires \$1.16 in public services.<sup>3</sup>

***The Planning Commission recommendation will protect water quality***

The *Draft SEIS*, in Figure 2-3: Soil Limitations to Septic Sewer Systems on page 2-6, documents that most of Clark County is “very limited” for the use of onsite sewer systems. Marylynn Yates, in a peer-reviewed scientific journal, analyzed ground water pollution from septic tanks. She concluded that septic tanks are major contributors of waste water, septic tanks are the most frequently reported cause of ground water contamination, and the most important factor influencing ground water contamination from septic tanks is the density of the systems.<sup>4</sup> Lot sizes associated with ground water contamination cases ranged from less than a quarter acre to three acres.<sup>5</sup> More recent studies support these conclusions. For example, an “observational study identified septic system density as a risk factor for sporadic cases of viral and bacterial diarrhea in central Wisconsin children.”<sup>6</sup> The greater the density of septic

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<sup>1</sup> John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B PLANNING AND DESIGN 503, 511 (2003) Enclosed with the paper original of Futurewise’s Sept 10, 2015 letter commenting on the DSEIS

<sup>2</sup> *Id.* at 518

<sup>3</sup> American Farmland Trust Farmland Information Center, *Cost of Community Services Studies* p. 6 (August 2010) accessed on Sept 9, 2015 at [http://www.farmlandinfo.org/sites/default/files/COCS\\_08-2010\\_1.pdf](http://www.farmlandinfo.org/sites/default/files/COCS_08-2010_1.pdf) and enclosed with the paper original of Futurewise’s Sept 10, 2015 letter commenting on the DSEIS These numbers are median values and include Cost of Community Services Studies in Skagit and Okanogan Counties *Id.* at p. 5

<sup>4</sup> Marylynn V Yates, *Septic Tank Density and Ground-Water Contamination* 23 GROUND WATER 586, p 590 (1985) accessed most recently on Sept 9, 2015 at <http://info.ngwa.org/gwof/pdf/852537546.PDF> and enclosed with the paper original of Futurewise’s Sept 10, 2015 letter commenting on the DSEIS Ground Water is a peer reviewed scientific journal. See the Ground Water Peer Review enclosed with the paper original of Futurewise’s Sept 10, 2015 letter commenting on the DSEIS

<sup>5</sup> Marylynn V Yates, *Septic Tank Density and Ground-Water Contamination* 23 GROUND WATER 586, p 590 (1985).

<sup>6</sup> Mark A. Borchardt, Po-Huang Chyou, Edna O. DeVries, and Edward A. Belongia, *Septic System Density and Infectious Diarrhea in a Defined Population of Children* 111 ENVIRONMENTAL HEALTH PERSPECTIVES 742, p 745 (2003) accessed most recently on Sept 9, 2015 at <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1241485/pdf/ehp0111-000742.pdf> and enclosed with the paper original of Futurewise’s Sept 10, 2015 letter commenting on the DSEIS. Environmental Health Perspectives is a peer reviewed scientific journal. See the Environmental Health Perspectives Journal Information accessed on Sept 9, 2015 at <http://ehp.niehs.nih.gov/journal-information/> and enclosed with the paper original of Futurewise’s Sept 10, 2015 letter commenting on the DSEIS

tanks the greater the likelihood of diarrheal disease.<sup>7</sup> And the highest septic tank densities studied were one septic tank per 11 acres.<sup>8</sup>

Given the large areas of the county that are “very limited” for the use of onsite septic systems and that most of the rest of the county is “somewhat limited,” the Planning Commission recommendation will protect water quality.

***The Planning Commission Recommendation will protect property owners’ wells***

The Washington State Department of Ecology (Ecology) has determined that “[t]here is limited water available for new uses in [Water Resource Inventory Area] WRIA 27” the Lewis River Watershed and “much of the water in the Lewis River Watershed has already been spoken for.”<sup>9</sup> The situation is the same in the Salmon-Washougal Watershed, WRIA 28. “There is limited water available for new uses ” and “much of the water in this watershed has already been spoken for.”<sup>10</sup> In fact, water is in such short supply that there is already evidence that the overdevelopment of rural lands has caused wells to run dry.<sup>11</sup>

When Ecology adopted the instream flow rules for WRIs 27 and 28, Ecology established reserves for future domestic uses.<sup>12</sup> Enclosed with this letter are an email and two spreadsheets and, in a separate email, maps that show the status of those reserves as of the end of June 2015 Ecology estimates that the reserves can accommodate another 2,747 domestic wells with each well serving one house and with one household in the house, 1,627 households served by small community water systems, and Clark County Public Utilities can serve another 485 households outside cities.<sup>13</sup> So Clark County should limit the number of currently vacant and new rural,

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<sup>7</sup> Mark A Borchardt, Po-Huang Chyou, Edna O. DeVries, and Edward A. Belongia, *Septic System Density and Infectious Diarrhea in a Defined Population of Children* 111 ENVIRONMENTAL HEALTH PERSPECTIVES 742, pp. 745 – 47 (2003)

<sup>8</sup> *Id.* at 747

<sup>9</sup> Washington State Department of Ecology Water Resources Program, *Focus on Water Availability Lewis River Watershed, WRIA 27* p. 1 (Publication Number. 11-11-031 August 2012) accessed on Sept. 8, 2015 at: <https://fortress.wa.gov/ecy/publications/summarypages/1111031.html> and enclosed with the paper original of Futurewise’s Sept. 10, 2015 letter commenting on the DSEIS

<sup>10</sup> Washington State Department of Ecology Water Resources Program, *Focus on Water Availability Salmon-Washougal Watershed, WRIA 28* p. 1 (Publication Number. 11-11-032 August 2012) accessed on Sept. 8, 2015 at: <https://fortress.wa.gov/ecy/publications/summarypages/1111032.html> and enclosed with the paper original of Futurewise’s Sept. 10, 2015 letter commenting on the DSEIS

<sup>11</sup> Personal Communication from Coyote Ridge Ranch to Tim Trohimovich (April 02, 2015) enclosed with the paper original of Futurewise’s Sept. 10, 2015 letter commenting on the DSEIS

<sup>12</sup> Washington State Department of Ecology Water Resources Program, *Focus on Water Availability Lewis River Watershed, WRIA 27* p. 1 (Publication Number. 11-11-031 August 2012), Washington State Department of Ecology Water Resources Program, *Focus on Water Availability Salmon-Washougal Watershed, WRIA 28* p. 2 (Publication Number. 11-11-032 August 2012).

<sup>13</sup> The enclosed spreadsheet WRIA 27-28 Reservations ESTIMATES w Totals for Clark County by Category totals the Ecology data for Clark County.



agricultural, and forest land lots to about 4,859 and only in the parts of the county outside cities that have available reserves. After the reserves are exhausted, new permit-exempt wells can only be used if the person proposing to use the well provides in-kind mitigation, which typically requires acquiring a water right senior to the instream flow rules.<sup>14</sup>

However, Clark County currently has 5,042 existing vacant lots in the rural areas and on resource lands as of 2014.<sup>15</sup> So the County already has more lots than can be supported by the surface and ground water resources available in the rural areas and on resource lands. Since the Planning Commission recommendation allows a more moderate level of new lot creation than some alternatives, it will better protect existing water rights holders who may otherwise see their wells or their diversions run dry.

The county's water providers are not planning on serving most of the rural area with piped water. The *Clark County Coordinated Water System Plan Update: Regional Supplement* calls for serving rural development outside of "rural centers" with private wells.<sup>16</sup> The *Clark County Coordinated Water System Plan Update* states that the rural areas "are not expected to accommodate large amounts of population growth."<sup>17</sup> So the Planning Commission alternative is consistent with the plans of the county's water providers.

***The Planning Commission recommendation will help keep healthy local food available for Clark County residents***

The Planning Commission recommendation will help to continue to protect the county's working farms. This will help make healthy, local food available to county residents.

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<sup>14</sup> *Foster v. Washington State Dep't of Ecology*, No. 90386-7, 2015 WL 5916933, at \*4 (Wash. Oct. 8, 2015)

<sup>15</sup> *Clark County Buildable Lands Report* p. 13 (June 2015) accessed on Oct. 15, 2015 at: [http://www.clark.wa.gov/thcgrnd/documents/061015WS\\_2015BUILDABLE\\_LANDS\\_REPORT.pdf](http://www.clark.wa.gov/thcgrnd/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf) and cited page enclosed with this letter

<sup>16</sup> Clark County Water Utility Coordinating Committee, *Clark County Coordinated Water System Plan Update Regional Supplement* p. 25 & p. 36 (Nov. 2011) accessed on Sept. 4, 2015 at [http://www.clark.wa.gov/planning/comp\\_plan/documents/Final\\_2011CWSP-optimized.pdf](http://www.clark.wa.gov/planning/comp_plan/documents/Final_2011CWSP-optimized.pdf) and enclosed with the paper original of Futurewise's Sept. 10, 2015 letter commenting on the DSEIS

<sup>17</sup> *Id.* at p. 15

## Changes we recommend to the Planning Commission Recommendation

*Please do change combine the three rural comprehensive plan designations into one "Rural" designation*

The Growth Management Act requires and the Washington State Supreme Court has held that the rural element of the comprehensive plan must include a variety of rural densities<sup>18</sup> In *Kittitas County v. Eastern Washington Growth Management Hearings Board*, the Kittitas County Comprehensive Plan had a single rural comprehensive plan designation. Kittitas County's Limited Areas of More Intense Rural Development (LAMIRDs) also had separate comprehensive plan designations. The county argued that the reference in the comprehensive plan to "zoning regulations that have included six possible designations (with three possible densities) and innovative zoning techniques" complied with the Growth Management Act requirement for a variety of rural densities.<sup>19</sup> Based on the plain language of the Growth Management Act, the Washington State Supreme Court held that the comprehensive plan itself must include a variety of rural densities and the Kittitas County Comprehensive Plan violated this requirement.<sup>20</sup>

The Washington State Supreme Court identified a practical reason for this requirement:

¶ 40 We also note a practical concern raised by RIDGE and CTED. They argue that reading the GMA to not require that the Plan itself provide for a variety of rural densities will result in the evasion of GMA requirements through site-specific rezones. This is not the first time this court has recognized this potential problem. See *Woods v. Kittitas County*, 162 Wn. 2d 597, 629–32, 174 P.3d 25 (2007) (Becker, J., concurring). Because interested parties cannot raise GMA compliance issues in Land Use Petition Act (chapter 36.70C RCW) petitions, *id.* at 616, 174 P.3d 25 (majority opinion), site-specific rezones are only evaluated for compliance with the GMA through evaluation of their consistency with the existing Plan. A comprehensive plan that is silent on the provision of a variety of rural densities (and other protective measures for rural areas) effectively allows rezones that circumvent the GMA. This argument may prove too much, as rezones must also comply with development regulations, which can be challenged for compliance

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<sup>18</sup> RCW 36.70A.070(5), *Thurston County v. Western Washington Growth Management Hearings Board*, 164 Wn 2d 329, 357, 190 P.3d 38 (2008).

<sup>19</sup> *Kittitas Cnty. v. E Washington Growth Mgmt Hearings Bd*, 172 Wn 2d 144, 167, 256 P 3d 1193, 1204 (2011)

<sup>20</sup> *Kittitas Cnty.*, 172 Wn 2d at 169, 256 P 3d at 1205 "A plain reading of the statute indicates that the Plan itself must include something to assure the provision of a variety of rural densities "

with the GMA. *Id.* at 615–16, 174 P.3d 25. However, in *Woods*, the petitioner’s land was designated at one dwelling unit per 20 acres, and the County later approved a 3-acre rezone after it was too late for her to challenge the development regulations for compliance with the GMA. *Id.* at 629–30, 174 P.3d 25 (Becker, J., concurring) (“The rezone was the first and only time that the actual change of density on the subject site could have been challenged ... as violating the GMA.”); RCW 36.70A.290(2) (stating that petitions challenging a comprehensive plan or development regulation as noncompliant with the GMA “must be filed within sixty days after publication”). While we decide this question on the basis of the plain statutory language, we recognize that reading out the requirement that counties include certain protections in the Plan itself, including to provide for a variety of rural densities, could result in the evasion of GMA requirements through site-specific rezoning.<sup>21</sup>

The recommended single rural comprehensive plan designation is just like the single rural designation in Kittitas County. Like Kittitas County, that violates the Growth Management Act. So we recommend you do not include this feature in the preferred alternative.

### **Please do not include the urban growth area expansions**

Urban growth areas may only be expanded to accommodate the County’s need for housing and jobs.<sup>22</sup> The existing urban growth areas can already accommodate the County’s housing and employment projections.<sup>23</sup> So we urge the Board of County Councilors to reject the urban growth area expansions including 3.a, Battle Ground and 3.b, La Center. Maintaining properly sized urban growth areas will save money for taxpayers and ratepayers.<sup>24</sup>

Thank you for considering our comments. If you require additional information please contact me at telephone 206-343-0681 Ext. 118 and email [tim@futurewise.org](mailto:tim@futurewise.org)

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<sup>21</sup> *Kittitas Cnty*, 172 Wn. 2d at 169, 256 P 3d at 1205

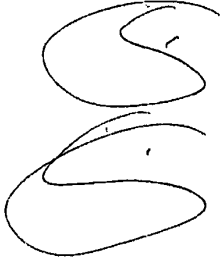
<sup>22</sup> *Thurston County v Western Washington Growth Management Hearings Bd*, 164 Wn 2d 329, 351 – 52, 190 P 3d 38, 48 – 49 (2008). See RCW 36.70A 110 and RCW 36 70A 115 which limit the size of UGAs

<sup>23</sup> *Clark County Buildable Lands Report* pp. 9 – 14 (June 2015) accessed on Oct 15, 2015 at [http://www.clark.wa.gov/thegrid/documents/061015WS\\_2015BUILDABLE\\_LANDS\\_REPORT.pdf](http://www.clark.wa.gov/thegrid/documents/061015WS_2015BUILDABLE_LANDS_REPORT.pdf) and enclosed with Futurewise’s Sept 16, 2015 comment letter on the DSEIS

<sup>24</sup> John Carruthers and Gudmaundur Ulfarsson, *Urban Sprawl and the Cost of Public Services* 30 ENVIRONMENT AND PLANNING B. PLANNING AND DESIGN 503, 518 (2003)

Clark County Board of County Councilors  
Preferred EIS Alternative Comprehensive Plan Update  
October 16, 2015  
Page 7

Very Truly Yours,

A handwritten signature in black ink, consisting of two stylized, overlapping loops that resemble the letters 'S' and 'T'.

Tim Trohimovich, AICP  
Director of Planning & Law

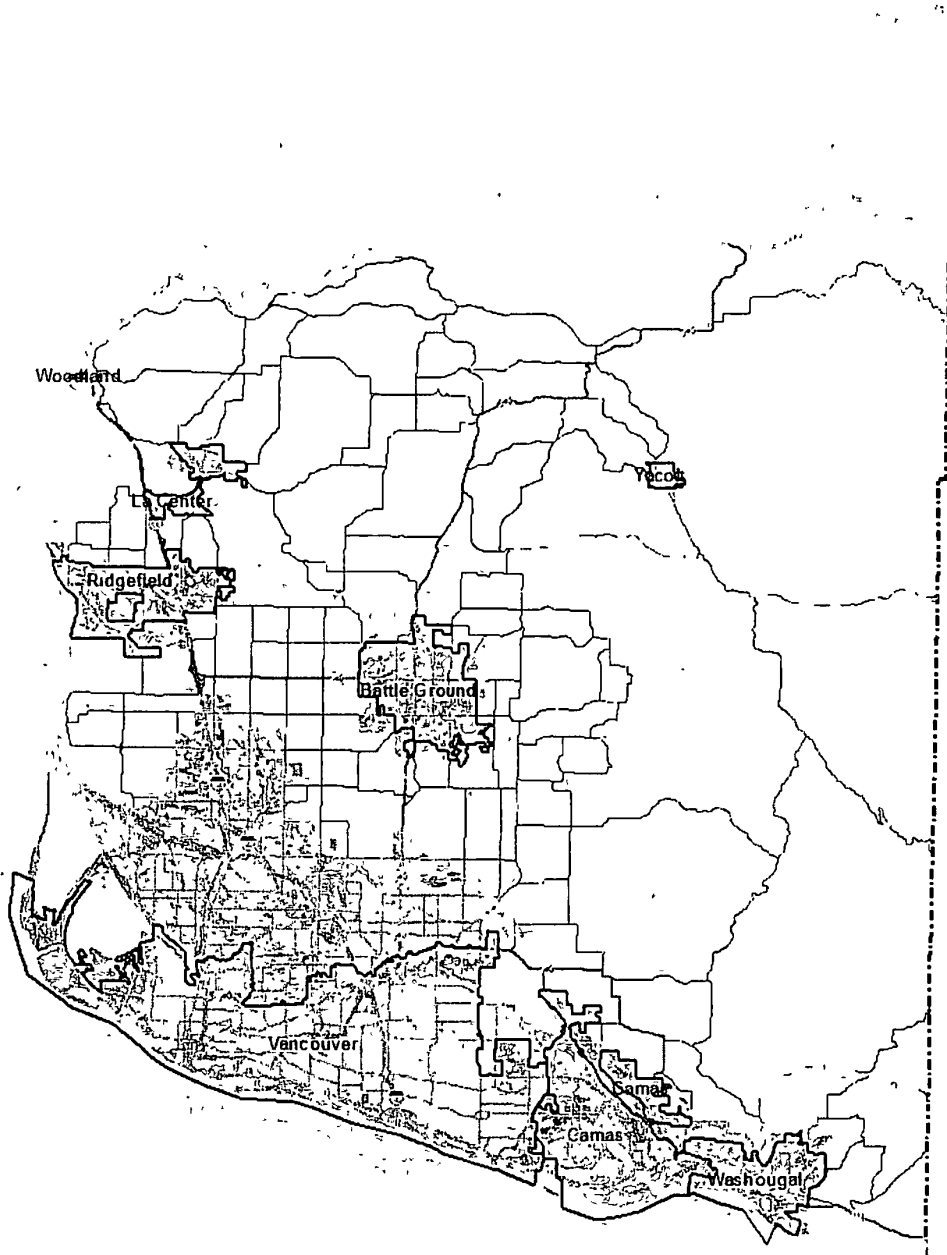
Enclosures

# BUILDABLE LANDS REPORT, June 2015



proud past, promising future

CLARK COUNTY  
WASHINGTON



**Table 6  
Rural Capacity Analysis, 2014**

Comprehensive Plan Designation	Conforming Vacant Lots			Undersized Vacant Lots (no minimum lot size)	Total Potential Vacant Lots	Rural Capacity
	Current	Potential Dividable	Total			
R-5	1,203	2,648	3,851	1,470	5,321	14,154
R-10	146	536	682	475	1,157	3,078
R-20	19	33	52	70	122	325
FR-40	34	90	124	643	767	2,040
FR-80	21	609	630	307	937	2,492
AG-20	156	432	588	498	1,086	2,889
<b>Total Rural</b>	<b>1,579</b>	<b>4,348</b>	<b>5,927</b>	<b>3,463</b>	<b>9,390</b>	<b>24,977</b>

Source: Clark County GIS



Mon, 14 May 2015 3:59 PM

Hoif, Tryg (EC) <THOF461@ECY.WA.GOV>

RE: Q about remaining water reserves for residential uses in WRAs 27 and 28 in Clark Co

You forwarded this message on 10/14/2015 3:21 PM

Message: WRA- 27-28 Reservations ESTIMATES.xlsx (14 KB) WRA27withReservations.jpg (2 MB) WRA28withReservations.jpg (2 MB)

Tryg,

Get more...

Here are our estimates at the end of June this year

Let me know if you have any questions

Tryg