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From: Karen Wood <kwood@pacifier.com>
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To: Cnty 2016 Comp Plan
Subject: 11/15 Assumption and Map Changes

Follow Up Flag: Follow up
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I have lived in Clark County for 50 years, in both rural and urban areas. I currently live in the city of Vancouver. I attended the open house at Hockinson High School on Monday, 11/16, and watched both the 11/9 BOCC/Planning Commission work session and the 11/19 Planning Commission hearing on CVTV. I also have been following and commenting on Comprehensive Plans going back to the first one in 1994. I think I am better informed than the average citizen, yet I have many questions and concerns about Councilor Madore's proposals. Following are my comments on the VBLM methodology changes, planning assumption changes, maps/Alternative 4 changes, and process/schedule.

VBLM Methodology Changes

The VBLM methodology changes proposed by Councilor Madore seem to be focused on supporting Alternative 4 rather than correcting the VBLM. The proposed changes indicate a lack of input from staff and others who understand the Rural VBLM. They have not been vetted by experts who understand the VBLM and planning principles. There also is no detail on how each of the VBLM changes impact the available developable land. This leads me to think all of the VBLM changes are suspect. Following are specific examples of VBLM changes that don't make sense to me.

Assumption #3 – Saying that some rural parcels can't be developed due to environmental constraint impacts on septic systems and having a letter from septic experts saying septic can be installed almost anywhere is contradictory.

Assumption #7 - Comments during County meetings indicated the market factor doesn't apply to rural lands since it would result in reducing urban lands and that it only makes sense to apply it to urban growth areas as a planning tool since they are constrained by urban growth boundaries. In addition the market factor is supposedly proposed to provide affordable housing in the rural area. Allowing more development on rural lands does not address high housing costs since most low income people live in urban, not rural, areas.

Planning Assumption Changes

As with the VBLM, I don't think the planning assumption changes have been vetted by staff and analyzed by those who understand the impacts of changing the assumptions this late in the process. They seem to be focused on supporting Alternative 4 rather than improving the planning assumptions.

I disagree with the proposed change to the urban/rural split from 90/10 to 86/14 (or 87.5/12.5). My understanding is the split applies to future growth, not the current split in County population. In addition, it is a policy goal that results in directing most population growth to urban areas where the growth can be accommodated at a lower cost to taxpayers and prevents the large amount of parcelization of rural lands that occurred in the past before the Growth Management Act. Encouraging more growth in rural areas increases costs for infrastructure and other services in addition to having a greater environmental impact. Proposing that because historically the county population split has been 86/14 means that is how it should be split in the future indicates a lack of understanding of the goals of the Growth Management Act. Also, since a 90/10 future

growth split has maintained an 86/14 current population split, why does the split need to be changed? If one looks at the actual historical population growth in rural areas, it has averaged 10-11% since 1994. So even if based on history, 12.5%/14% is too high.

I also disagree with proposed Planning Assumption 8 which states because lot sizes in an area are nonconforming that other lots in that area should be allowed to be further subdivided. This would continue the low density sprawl that occurred prior to 1994 that the Growth Management Act was meant to reduce, with the same adverse impacts as discussed above related to the urban/rural split.

Maps/Alternative 4 Changes

Not enough data is available to understand or evaluate the changes to Alternative 4. The maps themselves do not provide the type of information that is needed to analyze the revisions to Alternative 4. There is no information on acres impacted or detail on what the new proposal is, such as how agricultural, forest, and rural parcel zoning is being changed. It is nice to know that Councilor Madore realizes Alternative 4 in the Draft SEIS does not "pass muster" related to preserving resource lands; it is unfortunate that he didn't seek or listen to input from experts about it before it was proposed. As I have commented previously, both Alternative 2 and Alternative 4 allow too much development in rural areas and I do not support them. The recent revision of Alternative 4 doesn't change my position.

Process/Schedule

I have concerns about all of the above changes coming this late in the process. The planning assumptions were approved by the BOCC in June 2014 and again in April 2015. Now that the Draft SEIS has produced results that Councilor Madore doesn't agree with, he wants to change the planning assumptions.

The VBLM and planning assumption changes would need to be applied to all of the alternatives. Applying them to Alternative 1 moves it from being based on the 2007 Comprehensive Plan to needing to be revised significantly. This could require a full EIS rather than the supplemental EIS that has been prepared at great expense to county taxpayers. At a minimum, the Draft SEIS would need to be updated to reflect changes in the VBLM and planning assumptions, if they are approved.

Also, although County staff has set a schedule for the rest of the process, I don't think they are indicating the ongoing changes have not had an impact. Judging by the timeline back in January before Councilor Madore began bringing forward his proposals, I would guess that the remaining time left before the June 30th deadline is not enough to do a good job on the Final EIS and capital facilities plan and that it will be difficult to meet the deadlines. I would suggest either going with Alternative 1 for this update and then moving into a new comprehensive plan update in the near future, or asking the Growth Management Board for additional time to complete this update. Otherwise, I'm afraid the final submission to the Growth Management Board is likely to be rejected as invalid, especially if Alternative 2 or Alternative 4 are in the Final EIS, due to not being in compliance with the Growth Management Act.

Summary

I disagree with the VBLM and planning assumption changes being proposed by Councilor Madore, because they have been proposed so late in the process and have not been vetted by experts on the planning process and models. There has been too little information provided to answer the many questions I have about the proposed changes to the VBLM, assumptions, and alternatives, in addition to the fact that there are changes to them with every version I have seen. In previous comments, I have said I do not support the reduction in lot sizes proposed in Alternative 2 and Alternative 4. I do fully support the decision by the Planning Commission on 11/19 to maintain the decision it made during its September meeting.

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