



Ronald Onslow, Mayor
Sandra Day, Councilmember
John Mann, Councilmember
Donald Stosè, Councilmember
David Taylor, Councilmember
Lee Wells, Councilmember
Darren Wertz, Councilmember

November 23, 2015

David Madore, Chair
Jeanne Stewart, Councilor
Tom Mielke, Councilor

Public Service Center
1300 Franklin St , 6th Floor
Vancouver, WA 98660

Honorable County Councilors.

Thank you for this opportunity to comment on the 2016 Comprehensive Growth Management Plan Update. At this point in the process, we respectfully request you adopt the preferred alternative recommendations of the Clark County Planning Commission, with the addition of the City of Ridgefield's request for UGB expansion submitted in January 2015.

With regards to Ridgefield's request to include 107.47 acres of land north of the current City boundary, we ask that you reference the 2014 Global Wise report previously submitted to the Council. That report concluded that subject parcels are not suitable for long-term commercially-significant agricultural production, because:

- The land is already subdivided into 18 buildable lots, ranging in size from 5 to 6.87 acres (except for one lot that is 13.83 acres);
- The land is subject to intense pressure for conversion to small, fragmented "martini farms" under its existing zoning;
- The land was studied as part of Alternative 3 in the 2016 Comprehensive Plan process, as well as in the 2007 Comprehensive Plan process; and
- The land is adjacent to current urban services and rapid development, which makes the land relatively easy for the City to serve.

For the same reason we are asking the County to prevent the development of small, fragmented rural residential parcels – by approving the request outlined above – we are also asking that you not select Alternative 4 (in its original form or the subsequent revisions) as your preferred alternative. We have significant concerns with the potential addition of hundreds of new small rural residential lots (in the form of smaller Ag and Rural Residential zones) which would tax our City infrastructure and eliminate future job growth opportunities. We also have concerns with potential changes to key planning assumptions which create the foundation for the entire Comprehensive Plan Update.

Specifically:

- *Assumptions* – The recently proposed changes, to assumptions which were adopted by the Board of County Councilors in 2014, affect our City in four key ways:
 - The DSEIS relies on the population forecast adopted by the Board of County Councilors. Any change to the population forecast number, which is the foundation for all planning efforts, is likely significant and will require a re-examination of the DSEIS.
 - Changes to the rural/urban split for future population could cause a significant damping effect on long term growth. The urban/rural split planning assumption is a target, and adjusting the target with related policy changes intended to support the planning target is not in Ridgefield's best interest.
 - The Growth Management Act requires internal consistency within Comprehensive Planning documents adopted by counties and jurisdictions within the county. Ridgefield's planning efforts have focused on implementing the population forecast and planning assumptions adopted by the Board of County Councilors in 2014. To revise assumptions at this late date will seriously threaten the ability of the county and cities to adopt Comprehensive Plans by the June 30, 2016 deadline.
 - The proposed rural assumptions threaten completion of the entire plan. The potential impacts of Alternative 4 noted in the SDEIS have not changed. Rather the assumptions used to estimate how rural and resource lands will be used have changed. The change in assumptions should be applied to all alternatives, and likely would have changed Ridgefield's comments during the SDEIS process had the information been available. We think the change in assumptions, which must be applied to all alternatives, will require an updated analysis and comment period to comply with the public participation requirement of the Growth Management Act.
- *Additional/Fragmented parcels* – Alternative 4, under the recently released planning assumptions, creates over 150 new lots directly outside the current City limits of Ridgefield. Those additional lots and people will have a direct impact on Ridgefield's capital facility planning efforts, most notably the transportation CFP. The fragmentation of parcels will also virtually eliminate job development through future expansion of the City's UGA, as low-density rural residential uses incompatible to jobs will develop adjacent to the City. Those impacts have not been adequately identified or studied.

Again, we appreciate this opportunity to give the Board of County Councilors specific feedback to help aid you in deliberating on a preferred alternative that will impact our City's growth and development. Due to the concerns and comments we've shared in this letter, as well as concerns raised by our City partners and the County's Planning Commission, we respectfully ask the Board adopt the Clark County Planning Commission recommendations for a preferred alternative, with the addition of the 107.47 acres of requested Urban Growth Boundary expansion area as detailed in our January 2015 request.

Sincerely,



Ron Onslow, Mayor
City of Ridgefield