

Board of County Councilors  
1300 Franklin Street, 6th Floor  
Vancouver, Washington

## Hearing Agenda

Tuesday, November 24, 2015

9:45 A.M.

### EMERGENCY MEDICAL SERVICE DISTRICT #1 BOARD MEETING

10:00 A.M.

#### PROCLAMATION

Reaffirmation of the National Motto – In God We Trust – and recognition of the dedication and hard work of Friends of the Carpenter

#### PLEDGE OF ALLEGIANCE

#### INVOCATION

#### CONSENT AGENDA

*Consent Agenda Items will be considered together and will be approved on a single motion. Any person desiring to remove an item for separate consideration should so request before approval of the agenda.*

#### COMMUNITY DEVELOPMENT

- 1 Request approval of a Plat Alteration (PLD2015-00019) to modify a slope setback on lot 2 of the recorded short plat. The site is located on 5.01 acres in the R-5 zone district and only lot 2 is affected.

(Fiscal Impact: yes no; + - n)

- 2 Request approval of a final plat for recording McKinley Subdivision.

(Fiscal Impact: yes no; + - n)

#### GENERAL SERVICES

- 3 Request approval of the 2016 Agreement with the Washington State Office of Public Defense (OPD) and Acceptance of \$384,065 in state funds from the OPD for the continuation of the salaries/benefits of the Indigent Defense Coordinator and her assistant, and District court services in Calendar Year 2016.

(Fiscal Impact: yes no; + - n)

For any questions regarding consent agendas, contact Mark McCauley at Mark.McCauley@clark.wa.gov or 360.397.2232.



For other formats, contact the Clark County ADA Office: Voice (360) 397-2322, Relay 711 or (800) 833-6388, Fax (360) 397-6165, E-mail ADA@clark.wa.gov



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### PUBLIC HEALTH

- 4 Request approval to submit an application for a grant to Multnomah County to increase one Community Health Work from 0.80 FTE to 1.00 FTE, to increase an additional Community Health Worker from 0.60 FTE to 0.70 FTE, and authorization for the Public Health Director to sign the grant application, the agreement, and any amendments. The grant provides funding for HIV case management and emergency housing services for eligible clients in Clark County. Public Health's proposed budget is \$199,884.

(Fiscal Impact: ~~yes~~ no; + - ~~n~~)

- 5 Request ratification by the Board of County Councilors of Staff Report 2015-1583, previously expedited on November 9, 2015. The staff report approved the submission of an application to the State of Washington, Department of Ecology, for funding of the Hazardous Waste and Toxics Reduction Program, approval to create and fill a 0.60 FTE Environmental Health Specialist II project position to staff the program, and approval for the Public Health Director to sign the proposal, contract, and amendments. Remuneration under the grant is \$135,000.

(Fiscal Impact: ~~yes~~ no; + - ~~n~~)

### TREASURER

- 6 Request approval of an Intergovernmental Agreement with the City of Kelso to provide remittance processing services. Providing this service to other agencies utilizes excess capacity while providing an efficient and low cost payment processing alternative to customers.

(Fiscal Impact: ~~yes~~ no; + - ~~n~~)

### ROUTINE

- 7 Request approval of warrants for payment of claims against various county departments as follows:
- 11/09 – 11/13/15 in the amount of \$7,606,793.12
  - 11/10 – 11/12/15 in the amount of \$50,535.95
- 8 Request approval of minutes for October 20, 2015; and November 10, 2015.

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## *Hearing Agenda*

### 9 Approval of County Manager Appointments and Letters of Acceptance for

- John C Moore appointed to the Clark Communities Bicycle and Pedestrian Advisory Committee, effective Dec 1, 2015 to Nov 30, 2019
- Terry Maxwell appointed to the Clark Communities Bicycle and Pedestrian Advisory Committee, effective Dec 1, 2015 to Nov 30, 2019
- Steven R Koch appointed to the Clark Communities Bicycle and Pedestrian Advisory Committee, effective Dec 1, 2015 to Nov 30, 2019
- Anna Dearman appointed to the Clark Communities Bicycle and Pedestrian Advisory Committee, effective Dec 1, 2015 to Nov 30, 2019
- Jack Androvich appointed to the Clark Communities Bicycle and Pedestrian Advisory Committee, effective Dec 1, 2015 to Nov 30, 2019
- Michael Andreotti appointed to the Clark Communities Bicycle and Pedestrian Advisory Committee, effective Dec 1, 2015 to Nov 30, 2019
- Jennifer Pesut appointed to the Clark Communities Bicycle and Pedestrian Advisory Committee, effective Dec 1, 2015 to Nov 30, 2019
- Herb Maxey appointed to the Commission on Aging, effective immediately to May 31, 2017
- Eric Golemo reappointed to the Development and Engineering Advisory Board (DEAB), effective Jan 1, 2016 to Dec 31, 2018
- Ott Gaither reappointed to the Development and Engineering Advisory Board (DEAB), effective Jan 1, 2016 to Dec 31, 2018
- Jeffrey Wriston reappointed to the Development and Engineering Advisory Board (DEAB), effective Jan 1, 2016 to Dec 31, 2018.

### 10 Ad Valorem taxes received:

- East County Fire & Rescue
- Fire District 5
- Fire District 3
- Fire District 6
- City of Vancouver

## **PUBLIC COMMENT—CLARK COUNTY ISSUES**

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## Hearing Agenda

### **PUBLIC HEARING: CLARK COUNTY STORMWATER MANUAL AND CODE UPDATE**

The Board of County Councilors will consider proposed updates to the Clark County Stormwater Manual (Manual) and related codes for stormwater management Pursuant to Clark County's Phase I Municipal Stormwater Permit issued under the National Pollution Discharge Elimination System (NPDES) program, the county must update the Manual and code to be equivalent to the 2014 Stormwater Management Manual for Western Washington The County Manual will be adopted by reference in the updated stormwater code Proposed code changes include (1) repeal of Chapter 40 385 CCC and its replacement by new Chapter 40 386 CCC, (2) updates to the Water Quality Code, Chapter 13 26A CCC, to harmonize with the new Manual and remove outdated language, and, (3) updates to Title 40 update to refer to the new Manual and remove barriers to fully utilizing Low Impact Development (LID) techniques The State Department of Ecology requires that these updates and revisions become effective by January 8, 2015

Staff Rod Swanson, (360) 397-2121, ext 4561

### **PUBLIC HEARING: 2016 COMPREHENSIVE PLAN UPDATE**

Clark County is updating its comprehensive plan to meet the 2016 Growth Management Act deadline As part of the update process, the county is required to analyze the impacts of growth alternatives through the SEPA process The county re-adopted the environmental impact statement (EIS) prepared for the 2007 update and prepared a draft supplemental EIS (DSEIS) to analyze four (4) potential growth options for the 2016-2035 time horizon

The Board and the Planning Commission held a joint public hearing on the DSEIS on September 3 and 10 On September 17, the Planning Commission decided on a preferred alternative to recommend to the Board On October 20, the Board held a hearing on the Planning Commission recommendation The Board elected to continue that hearing to November 24 and to expand the scope as follows:

The Board will consider and may take action on a broad range of options and revisions related to the comprehensive plan and related documents including revisions to the planning assumptions, VBLM methodology, population projections, urban/rural split ratio, corrections to the SEIS, revised maps, documents to be included or excluded from the comprehensive plan, and the definition of a preferred alternative

Revised maps of Alternative-4 and additional documents relating to planning assumptions and population projections have been posted on the county website under the October 20 Public Hearing entry of the Grid at <http://clark.wa.gov/thegrid/>

The Board will take public testimony on all of these considerations before making decisions on these matters, adopting a preferred alternative and associated zoning maps, and authorizing a final SEIS to be prepared consistent with those decisions

Staff Contact Oliver Orjako (360) 397-2280, ext 4112, Gordy Euler (360) 397-2280, ext 4968

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## *Hearing Agenda*

### COUNCILOR COMMUNICATIONS

### ADJOURN

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RESOLUTION NO. 2015-11-\_\_

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A RESOLUTION amending Resolution 2015-04-05 and other planning assumptions and policies relating to Clark County's comprehensive land use plan 2016 update pursuant to RCW 36 70A.

WHEREAS, the Board has diligently engaged in a thorough process involving numerous duly advertised public meetings including work session, open houses, and hearings, and;

WHEREAS, the Board took public testimony from interested parties, considered all the written and oral arguments and testimony, and considered all the comments presented to the Board, and

WHEREAS, the Board has considered and adopted an evolving set of assumptions, definitions, parameters, documents, maps, and policies based on a continually increasing body of knowledge provided by diligent research, historical records, arguments, testimony, comments, and a draft SEIS, and,

WHEREAS, these processes served to define, correct, refine, and optimize the draft assumptions and plans in order to incorporate identified improvements and to mitigate identified concerns, and;

WHEREAS, the Board at a duly advertised public hearing on November 24, 2015, finds that adoption will further the public health, safety and welfare, now therefore,

BE IT ORDERED AND RESOLVED BY THE BOARD OF COUNTY COUNCILORS OF CLARK COUNTY, STATE OF WASHINGTON AS FOLLOWS:

The Board hereby adopts choice B of Exhibit A to amend the previously adopted assumptions and policies for Clark County's comprehensive plan 2016 update.

Furthermore, the Board adopts Exhibit B to document the proposed rural forecasts and planned rural capacity as significantly more conservative than the approved 2004-2024 GMA compliant Comp Plan update.

- Exhibit A - Planning Assumption Choices - Rev 1 09
- Exhibit B - Rural Comparison of the 2004-2024 and the Proposed 2016-2035 Comp Plan Update

ADOPTED this 24th day of November, 2015.

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Attest.

BOARD OF COUNTY COMMISSIONERS  
FOR CLARK COUNTY, WASHINGTON

\_\_\_\_\_  
Clerk of the Board

\_\_\_\_\_  
David Madore, Chair

APPROVED AS TO FORM ONLY  
Anthony F. Golik, Prosecuting Attorney

\_\_\_\_\_  
Jeanne E Stewart, Councilor

By \_\_\_\_\_  
Deputy Prosecuting Attorney

\_\_\_\_\_  
Tom Mielke, Councilor



**Preferred Alternative and Comp Plan Policy**  
2016 Comprehensive Plan Update

The Preferred Alternative starts with a foundation of Alternative 1 that is then progressively modified by the following elements with the last element taking priority and precedent over prior (lower number) elements. Related Comp Plan Update Policy is also specified as follows:

Alternative	Option Description	Planning Commission Recommendation	Preferred Alternative?
<b>Ait. 1</b>	<b>NO ACTION ALTERNATIVE</b>		
<b>1</b>	The 'No Action' alternative. This option re-adopts the current plan, planning assumptions and moves the planning horizon out to 2035.	Motion to Approve: AYE – 6 ; NAY – 0 <b>Motion Passed</b>	<b>Yes</b>
<b>Ait. 2</b>	<b>COUNTY-INITIATED ALTERNATIVE</b>		
	<b>RURAL LANDS</b>		
<b>2.a</b>	<b>Rural Lands.</b> Change the comp plan map legend from three comp plan designations to one Rural designation to be consistent with current comp plan-to-zoning matrix table.	Motion to Approve: AYE – 6; NAY – 0 <b>Motion Passed</b>	<b>Yes, see Note 2.a</b>
<b>2.b</b>	<b>Agriculture Lands.</b> Change the minimum lot size for parcels zoned AG-20 from 20 acres to 10 acres (AG-10).	Motion to <b>Deny</b> : AYE – 4; NAY – 2 <b>Motion Passed</b>	<b>No</b>
<b>2.c</b>	<b>Forest Lands.</b> Change the minimum lot size for parcels zoned FR-40 from 40 acres to 20 acres (FR-20).	Motion to Approve: AYE – 2; NAY – 4 <b>Motion Failed</b>	<b>No</b>
<b>2.d</b>	<b>Rural Lands.</b> For parcels zoned R-20, from 20 acres to 10 acres, in some areas.	<b>No Vote Taken</b>	<b>No</b>
<b>2.e</b>	<b>Rural Centers.</b> Combine rural center commercial (CR-2) and rural commercial (CR-1) into a single comp plan designation of 'rural commercial'.	Motion to Approve AYE – 5; NAY – 1 <b>Motion Passed</b>	<b>Yes</b>
<b>2.f</b>	<b>Urban Reserve.</b> Urban reserve (UR) becomes a true overlay. Zoning defaults to underlying zone; some parcels given R-5 zoning. UR code moved to the overlay chapter of Title 40. No change in allowable	Motion to Approve AYE – 5; NAY – 1 <b>Motion Passed</b>	<b>Yes</b>



Preferred Alternative and Comp Plan Policy  
2016 Comprehensive Plan Update

land uses.			
<b>URBAN LANDS</b>			
2.g	<b>Commercial Lands.</b> Combine the three commercial zones (C-2, C-3 and GC) into a single comp plan (C) designation.	Motion to Approve AYE – 5; NAY – 1 <b>Motion Passed</b>	Yes
2.h	<b>Public Facilities.</b> Creation of public facilities zone.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
2.i	<b>Urban Holding.</b> Urban holding (UH) becomes a true overlay. Zoning defaults to underlying zone. UH code moved to the overlay chapter of Title 40. No change in allowable land uses.	Motion to Approve AYE - 5; NAY – 1 <b>Motion Passed</b>	Yes
2.j	<b>Battle Ground UGA.</b> Changes comp plan and zoning designations to better reflect surrounding land uses.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
2.k	<b>Ridgefield UGA.</b> Add the Tri-Mountain Golf Course to the Ridgefield UGA retaining Parks and Open Space (P/OS) zoning and adding an Urban Holding UH-20 overlay.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
2.l	<b>Vancouver UGA.</b> Remove reference to the Three Creeks Special Planning Area.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
2.m	<b>Vancouver UGA.</b> Approve the Discovery/Fairgrounds subarea comp plan map and zoning changes.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
2.n	<b>Vancouver UGA.</b> Approve the Salmon Creek subarea comp plan map and zoning changes.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
2.o	<b>Vancouver UGA.</b> Change some parcels that have a mixed use comp plan designation to a comp plan designation that matches current zoning.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
2.p	<b>Vancouver UGA.</b> Remove UR adjacent to the Vancouver UGA and replace it with R-5 and AG-20	Motion to Approve AYE – 5; NAY – 1	Yes





Preferred Alternative and Comp Plan Policy  
2016 Comprehensive Plan Update

	zoning.	Motion Passed	Yes, provided that the conditions specified in the existing comp plan are satisfied.
2.q	<b>Vancouver UGA.</b> Remove UH in the Fisher Swale area between Vancouver and Camas.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes, provided that the conditions specified in the existing comp plan are satisfied.
2.r	<b>Washougal UGA.</b> Correct mapping error on parcels with city zoning inside the UGA but outside city limits.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
<b>Alt. 3 CITY-REQUESTED UGA EXPANSIONS</b>			
3.a	<b>Battle Ground.</b> Add 80 acres, now designated R-5, to the UGA for jobs.	Motion to Approve AYE – 6; NAY - 0 <b>Motion Passed</b>	Yes
3.b	<b>La Center.</b> Add 17 acres, now designated R-5, for a school site.	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>	Yes
3.c	<b>La Center.</b> Add 56 acres, now designated AG-20, for jobs.	Motion to Approve AYE – 3; NAY – 3 <b>TIE VOTE – No Recommendation</b>	Yes, provided that if challenged, La Center will provide for the defense instead of Clark County.
3.d	<b>Ridgefield.</b> Add 111 acres, now designated AG-20, for residential.	Motion to <b>Deny</b> AYE – 5; NAY -1 <b>Motion Passed</b>	Yes, provided that if challenged, Ridgefield will provide for the defense instead of Clark County.
3.e	<b>Washougal.</b> Add 41 acres, now designated R-5, for residential.	Motion to Approve AYE – 2; NAY – 3 ABSTENTION – 1 <b>Motion Failed</b>	Yes
<b>Alt. 4 RURAL, AGRICULTURE, AND FOREST LANDS CHANGES</b>			
4.a	<b>Rural Lands.</b> Eliminate R-10 and R-20 zones unless	Motion to <b>Deny</b>	See Note 4.a



**Preferred Alternative and Comp Plan Policy**  
2016 Comprehensive Plan Update

	publicly owned property. Create R-1 and R-2.5 zones. Maintain R-5 zone.	AYE – 5; NAY – 1 <b>Motion Passed</b>	
4.b	<b>Agriculture Lands.</b> Eliminate AG-20 zone unless publicly owned property. Create AG-5 and AG-10 zones.	Motion to <b>Deny</b> AYE – 4; NAY – 2 <b>Motion Passed</b>	<b>See Note 4.b</b>
4.c	<b>Forest Lands.</b> Add FR-10 and FR-20 zones to existing FR-40 and FR-80 zones.	Motion to Approve AYE – 2; NAY – 4 <b>Motion Failed</b>	<b>Yes, see Note 4.c</b>
4.abc	<b>Cluster Options</b> <b>OTHER RECOMMENDATIONS</b>		<b>Yes, see Note 4.abc</b>
4.x	A <b>Motion</b> was made for the councilor's to allow for a process for flexibility and opportunity for land owners who continuously owned property prior to the 1994 plan to possibly divide their property. The vote was 5-1 to approve. There was discussion as to whether the effort, discussion of the process will come to the PC work session, meetings, etc.	Motion to Approve AYE – 5; NAY 1 <b>Motion Passed</b>	<b>No, see Note 4.x</b>
<b>Policy #</b>	<b>Comp Plan Update Policy</b>		
1	<b>Exhibit B - Assumptions – Choice B</b>		<b>Yes, see Policy 1</b>
2	<b>Comp Plan Update process and FSEIS</b>		<b>Yes, see Policy 2</b>

**Note 2.a:** Yes, provided that the revised Alternative 4 map is selected that, instead of proliferating significantly new 1 and 2.5 acre zoned parcels, nearly exclusively recognizes already existing 1 and 2.5 acre parcels in areas where they are the predominant parcel sizes.

**Note 4.a:** The revised Alternative 4 map is selected as the specific implementation of the policy that eliminates R-10 and R-20 zones unless publicly owned property, maintains the R-5 zone, and adds R-1 and R-2.5 zones that, instead of





## Preferred Alternative and Comp Plan Policy 2016 Comprehensive Plan Update

proliferating significantly new 1 and 2.5 acre zoned parcels, nearly exclusively recognizes already existing 1 and 2.5 acre parcels in areas where they are the predominant parcel sizes.

**Note 4.b:** The revised Alternative 4 map is selected as the specific implementation of the policy that adds AG-5 and AG-10 zones to the existing AG-20 zone.

**Note 4.c:** The revised Alternative 4 map is selected as the specific implementation of the policy that adds FR-10 and FR-20 zones to the existing FR-40 and FR-80 zones.

**Note 4.abc:** Yes. Cluster options shall be included in the Preferred Alternative for each of the rural zone categories of R, AG, and FR, as communicated by the Board throughout the Comp Plan Update process.

**Note 4.x:** No. It is not appropriate to add future general ideas / concepts to a Preferred Alternative. There is insufficient specificity for an FSEIS to analyze.

**Policy 1:** The Board selects as policy, Exhibit B and choice B of Exhibit A to be used as the specifications and criteria to be used in the FSEIS analysis. The October 8, 2015 subject matter expert letter from the Clark County Technical Advisory Committee on Septic Systems is to be included in the FSEIS to correct related out of date information published in the DSEIS.

**Policy 2:** The Board adopts the following policies and processes related to the Comp Plan:

- 2.1 The materials and information submitted for analysis by the FSEIS shall be wholly consistent with the Preferred Alternative and fully supportive of the policies selected by the Board of Clark County Councilors (Board).
  - 2.2 It shall be the policy of the Board to have the option to select an alternative consultant or resource to complete the FSEIS in the event of a cost overrun or delayed delivery date.
  - 2.3 The Board policy is hereby adopted to complete the FSEIS as scheduled by February 1, 2016.
  - 2.4 It shall be the policy of the Board to review the FSEIS, to specify any corrections deemed necessary, and to approve the FSEIS in a public hearing before the FSEIS is considered final and submitted to state.



**Preferred Alternative and Comp Plan Policy**  
**2016 Comprehensive Plan Update**

- 2.5 Since numerous Clark County policies have changed since the existing Comp Plan was adopted, the Comp Plan shall be updated to be consistent with adopted Clark County policies. The processes necessary for the Board to specify and incorporate those policies into the Comp Plan shall be completed within the allotted time.
- 2.6 Documents not actually published by the Board or by Clark County staff shall not be posted as Comp Plan reports or plans on the Clark County website.



proud past, promising future

CLARK COUNTY  
WASHINGTON

## COMMUNITY PLANNING

TO: Board of County Councilors

FROM: Clark County Planning Commission

DATE: November 20, 2015

SUBJECT: Public Hearing, Rural Vacant Land Model & Planning Assumptions

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### RECOMMENDATION

The Planning Commission held a public hearing on November 19, 2015 to consider changes to the planning assumptions, a new methodology for estimating capacity in rural Clark County (Nov 15, 2015, version 1 08) and revised Alternative 4 Rural, Agriculture and Forest maps. The Planning Commission voted 5 to 1 to readopt the recommendation (Exhibit 5) made to the Board of County Councilors (BOCC) on September 17, 2015.

### BACKGROUND

On September 17, 2015 the PC held a public hearing at which a recommendation was made to the BOCC on a preferred alternative. The BOCC held a public hearing on October 20<sup>th</sup> to consider the PC recommendation and decided to continue that hearing to November 24. In addition, new documents titled "Need to correct Clark County population growth rate forecast," "The need to plan for realistic rural population growth," and revised Alternative 4 Rural, Agriculture and Forest maps were introduced. A proposal to change the planning assumptions including a new methodology for estimating rural lots was presented to the PC at a work session on November 5.

On November 9, a joint PC/BOCC work session was held to discuss the proposed changes to the planning assumptions, new methodology for estimating rural lots, and revised Alternative 4 maps. At that work session, the Board gave direction to seek public comment on the new materials at two public meetings and a PC public hearing on November 19.

### METHODOLOGY ANALYSIS

The methodology for the Rural Vacant Lands Model (RVBLM) as described in Exhibit 1 was provided to the PC at the November 5 work session. The purpose of the RVBLM (model) is to estimate the number of potential houses (capacity) that can be accommodated on lands outside of the urban growth areas. The model analyzes land use derived from current and/or proposed zoning districts at the parcel level. Clark County Code defines a minimum lot size for each zone that is the foundation for determining the number of housing units a parcel could accommodate at full build-out. The numbers generated from this work are the numbers in the draft supplemental environmental impact statement (DSEIS) in Table 1-2 on page 1-3.

Exhibit 2 provides a side-by-side comparison between what was used for the draft supplemental impact statement (DSEIS) and the proposed changes to the planning assumptions. Exhibit 2

provides information on the reduction in the number of lots per the revised planning assumptions, as reviewed by GIS

Staff has reviewed the assumptions used in the proposed changes to the planning assumptions and discuss in more detail below the following key assumptions environmentally constrained layers, non-conforming lots, urban/rural population split, never to convert and market factor

#### Environmentally constrained layers

The proposed method excludes 100% of land that has the following environmental constrained or critical layers

- 100 year floodplain or flood fringe
- Wetlands inventory (NWI, high quality, permitted, modeled) with 100 foot buffer
- Slopes greater than 15 percent
- Land slide area that has active or historically unstable slopes
- Designated shorelines
- Hydric soils with 50 foot buffer
- Habitat areas with 100 foot buffer
- Species areas with 300 foot buffer
- Riparian stream buffers by stream type

The environmentally constrained layers are a tool to identify potential critical lands that need to be protected and to trigger additional environmental analysis to verify what is actually on the ground, as development is proposed. There are many instances where development envelopes are proposed to allow for development and protect the environment. These are proposed on a site specific basis after an on-site assessment done by either our environmental staff or a consultant hired by the property developer. Once the on-site assessment is done and the development envelopes are recorded on the plat, the property can be developed within those building envelopes identified. Given the large lot sizes in the rural area and the ingenuity of developers to maximize the development potential of the land, it may be more appropriate to use a percentage deduction based on the number of rural developments that have not reached their maximum density due to constrained lands. At the very least lots in platted subdivisions or short plats should be counted as buildable even if they fall below the 1 acre threshold since it has already been vetted and deemed buildable.

#### Non-conforming lots

Non-conforming lots are those lots that do not meet the minimum parcel size of the zoning designation. Clark County Code recognizes those parcels that were lawfully established as building lots prior to any legislative zone change as legal, non-conforming lots in the future. The proposed methodology concerning non-conforming lots assumes that only 10% of those lots will develop within the 20-year planning horizon. The premise of this assumption is based on data that shows a sharp decline in the development on non-conforming lots and using that trend line to project a future decline in the development of these non-conforming lots. The data used to establish this premise cannot be verified and therefore the conclusions reached cannot be justified.

For example, the data (Exhibit 3) provided to support this assumption shows 15,810 non-conforming lots built from 1995-2015. However, data on non-conforming lots in the rural area shows only 3,433 building permits issued between 1995 and 2014 (Exhibit 4). In addition the

building permit data for the entire rural area shows only 6,831 building permits in the same time frame. The building permit data provided in Exhibit 4 shows that non-conforming lots develop at a similar rate to rural development as a whole, so staff would suggest treating those lots the same as vacant land. If a 10% never to convert factor is to be applied it should also apply to the non-conforming lots as opposed to the 90% proposed.

#### Urban/Rural population split

The urban/rural population split is a policy decision. However those decisions in combination with a slightly modified population target affect the estimated number of people to plan for in the rural area. The DSEIS considered a 20-year growth of the rural population of 12,956. The Board gave direction on November 9 to consider 16,325. That is a 26% increase. Since the November 9 joint worksession a revision was made to bring the rural total to 16,656 a 29% increase.

#### Never to convert

Never to convert factor assumes that a certain percentage of land that is currently vacant or capable of being divided to create additional lots will not be developed in the 20-year planning horizon. The proposed methodology uses the same percentages as applied to the urban model (10% for vacant and 30% for underutilized). These factors have been used in the urban model but not in the rural model. The only applicable data available is the Rural Survey done in 2013. That survey asked property owners whether they would favor a smaller minimum lot size, thereby providing an opportunity to divide their land. 27% of the respondents indicated they would not be in favor of the smaller minimum lot size. This would be comparable to the 30% underutilized factor proposed. However, the level of interest in correcting the adopted 1994 land use plan would seem to indicate there is more interest in the rural area to create additional lots.

#### Market factor

Market factor is a tool used to size urban growth areas. WAC 365-196-310(4)(b)(ii)(F) states, in part

(F) The land capacity analysis may also include a reasonable land market supply factor, also referred to as the "market factor." The purpose of the market factor is to account for the estimated percentage of developable acres contained within an urban growth area that, due to fluctuating market forces, is likely to remain undeveloped over the course of the twenty-year planning period.

#### **ALT 4 MAP**

The revised version of the Alternative 4 map has one single parcel zoned R-10. Staff would not recommend having a zoning district made up of a single parcel.

## EXHIBIT 1

### **Estimating Potential Rural Housing and Employment Clark County, Washington**

The Rural Vacant Buildable Land Model (Rural VBLM) estimates the number of houses and jobs on lands outside of the Urban Growth Area. Rural lands and rural development behave differently than urban development. These differences are significant enough to require a new VBLM classification method. This document describes the Rural VBLM.

The Rural VBLM works very similar to the Urban VBLM. The primary input is a proposed land use layer. This layer is used to classify lands into the 3 VBLM land use categories: Residential, Commercial, or Industrial. The Assessor's database is used to classify the parcels into VBLM classifications (Vacant, Built, Underutilized, Excluded) based on the property type, ownership, and size. The Residential Rural VBLM differs most substantially from the Urban VBLM.

#### **Rural VBLM Land Uses**

Land use designations from the comprehensive plan or proposed zoning plan are categorized into the three land use models:

- Residential – rural, rural center residential, urban reserve, agriculture, and forest land use designations
- Commercial – commercial land use designations
- Industrial – industrial land use designations

#### **Residential VBLM Classifications**

Property with a proposed land use of Residential are subdivided into the following VBLM categories based on information from the Assessor's database:

- Built
  - Parcel has existing housing units
  - Parcel is too small to be further divided based on minimum lot size requirements
- Vacant
  - No existing housing units
  - May contain outbuildings
- Underutilized
  - Parcel has existing housing units
  - Parcel is large enough to be further divided based on minimum lot size requirements
- Excluded
  - Forest zoned lands in the Current Use program (Timber or Designated Forest Land (DFL))
  - Surface mining overlay area
  - Water Areas
  - Private street or Right of Way
  - Transportation or utilities
  - Private park or recreation areas
  - Assessed as a zero value property
  - Size is less than 1 acre
  - Tax exempt
- Not a Residential land use

**Residential Planning Assumptions:**

- Housing capacity calculation
  - One housing unit per undersized vacant parcel
  - Conforming vacant and underutilized parcels
    - Housing unit capacity is calculated by dividing the parcel acres by the minimum lot size.
    - For dividable parcels remainder lots are considered buildable if they are within 10% of the minimum lot size.
- Population Capacity calculation
  - 2.66 persons per housing unit

**Employment**

Most of the rural area is designated rural residential but there are pockets of commercial and industrial areas available for future employment. Commercial and Industrial lands use the same Rural VBLM classifications. The only difference is in the number of employees per acre

**Commercial and Industrial VBLM Classifications**

- Vacant
  - Building value less than \$67,500
- Underutilized
  - Parcels with existing buildings that have a building value per acre less than \$50,000
- Excluded
  - Surface mining overlay area
  - Water
  - Private street
  - Right of Way
  - Utilities
  - A Private park or recreation areas
  - Assessed as a zero value property
  - Tax exempt
- Built
  - Building value of \$67,500 or more
- Not Commercial or Industrial

**Employment Planning Assumptions:**

- Vacant and underutilized lands receive the same number of employees per acre
  - No reductions for constrained areas or infrastructure
  - Commercial employment
    - 20 employees per acre
  - Industrial employment
    - 9 employee per acre



## EXHIBIT 2

### Comparing Models for Estimating Potential Rural Housing Clark County, Washington

The Rural Vacant Buildable Lands Model (Rural VBLM) estimates potential houses on lands outside of urban growth areas. This document describes the residential model and compares the results for land use alternatives based on Draft Supplemental EIS (DSEIS) and proposed exclusions and planning assumptions.

The model analyzes land use derived from current and/or proposed zoning districts at the parcel level. Clark County Code defines a minimum lot size for each zone which is the foundation for determining the number of housing units a parcel could accommodate. Characteristics from the Assessor's database such as property type, units, and size are evaluated to help further determine if the land is developable.

#### Residential VBLM Land Use

*Residential classified land uses include*

- Rural
- Rural Center Residential
- Urban Reserve
- Agriculture
- Forest

#### Residential VBLM Classifications

Residential properties are divided into the following classifications:

- Built
  - Parcel has existing housing units
  - Parcel not large enough to be further divided
- Vacant
  - No existing housing units
  - Parcel size greater than or equal to minimum lot size
  - May contain outbuildings
- Vacant Undersized
  - Same as vacant but property size is below minimum lot size requirements
  - 1 acre minimum
- Underutilized
  - Parcel has existing housing units
  - Parcel is large enough to be further divided based on minimum lot size requirements
- Not Residential
  - Does not have a residential land use
- Excluded

Exclusion	DSEIS	Proposed
Forest zoned lands in the Current Use program (Timber or Designated Forest Land (DFL))	✓	(Note Some timberlands are excluded as site specific properties)
Surface mining overlay area	✓	✓
Water Areas	✓	✓
Private street or Right of Way	✓	✓
Transportation or utilities	✓	✓
Private parks or recreation areas	✓	✓
Assessed as a zero value property	✓	✓
Size is less than 1 acre	✓	✓
Mobile Home Parks		✓
Tax exempt	✓	✓
Site specific properties determined not buildable for various reasons		✓

✓ - excluded in the model

### Residential Planning Assumptions

Planning assumptions are applied to Vacant, Vacant Undersized, and Underutilized residential properties to better estimate development over the 20 year planning period

Assumption	DSEIS	Proposed
Constrained (Critical) Lands <sup>1</sup>	No reduction for constrained lands	All constrained lands are deducted from buildable lands
Never to Convert Factor	None	10% for vacant and 30% for underutilized applied to total housing units
Undersized Vacant Parcels Over 1 Acre	One housing unit	One housing unit if at least 1 acre with no constraints
Undersized lot Development Factor	None	10% of undersized parcels will likely develop
Housing Capacity for Vacant and Underutilized Lands	Housing Capacity = Total Acres / minimum lot size	At least 1 acre of unconstrained land per allowed housing unit If not, reduce housing units to the number that can be accommodated by unconstrained acres
10% Variance Factor	For dividable parcels one lot is considered buildable if it is within 10% of the minimum lot size	
Underutilized Parcels		Account for existing housing unit
Population Capacity		2 66 persons per housing unit

### Estimates for Potential Housing Units

The below table compares results for alternatives based on the DSEIS and proposed models. These numbers represent all buildable land including Agriculture, Forest, Rural, Rural Center, Urban Reserve, Columbia River Gorge areas and Agriculture/Wildlife designations.

Alternative	DSEIS Methodology*	Proposed Methodology
Alternative 1 (Current Zoning)	7,660	3,325
Alternative 4 Revision	11,409	6,638

\*The number of lots in the DSEIS does not include potential lots on the following land use designations: Rural Center, Urban Reserve, Columbia River Gorge and Agriculture/Wildlife.

**Identifying change in Potential New Housing Units between DSEIS Alt 4 and New Alt 4**

	Housing Units
<b>Alternative 4 (DSEIS) Total VBLM Housing Units</b>	<b>12,401</b>
Timber Excluded	1,278
Other Rural Zones	127
	<b>13,806</b>
<b>Factors</b>	<b>Reduced Housing Units*</b>
Constraints	3,594
Undersized Never to Convert (90% will not develop)	590
Never to Convert - 10% of Vacant	407
Never to Convert - 30% of Underutilized <sup>1</sup>	1,157
Never to Convert - 10% of Vacant Undersized	7
Overrides	772
Landuse Changes	629
Unidentified	12
<b>Total Housing Unit reductions</b>	<b>7,168</b>
<b>Revised Alternative 4 Total VBLM Housing Units</b>	<b>6,638</b>

\*Reduced housing units can be a result of more than one factor  
 DRAFT - 11/19/2015

**1. Constrained Lands:**

- 100 year floodplain or flood fringe
- Wetlands inventory (NWI, high quality, permitted, modeled) with 100 foot buffer
- Slopes greater than 15 percent
- Land slide area that has active or historically unstable slopes
- Designated shorelines
- Hydric soils with 50 foot buffer
- Habitat areas with 100 foot buffer
- Species areas with 300 foot buffer
- Riparian stream buffers by stream type (Table 2)

**Table 2: Riparian Buffers**

Stream Type	Buffer
Type S (Shoreline)	250 Feet
Type F (Fish Bearing)	200 Feet
Type NP (Non-fish bearing, perennial)	100 Feet
Type NP (Non-fish bearing, seasonal)	75 Feet

EXHIBIT 3

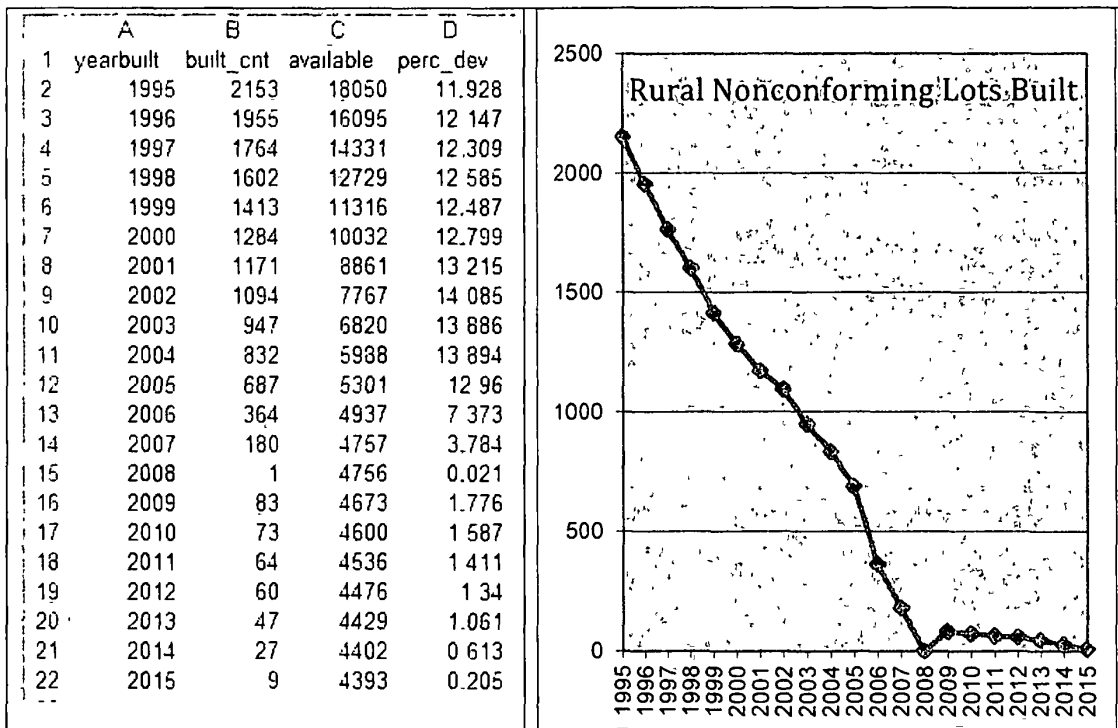
Ref	A (existing)	B (proposed)
6	All nonconforming parcels with 1 acre shall be counted as rural parcels that will develop.	10% of nonconforming parcels with at least 1 acre of unconstrained area will likely develop at the same rate indicated by historical records

**Why this is appropriate:**

The following tables shows the number of vacant nonconforming lots that were built each year since 1995. Of the 18,050 nonconforming lots that were available in 1995, a total of 15,810 have been built. Each one built diminished the number of remaining lots. A total of 4393 vacant nonconforming rural parcels remain today.

The precipitous graph indicates that a small percentage of the remaining vacant nonconforming lots are likely to get built. A rough approximation of the years since the discontinuity in 2008, estimates that approximately 440 of the remaining 4393 lots will likely develop, or about 10%.

Even though choice B is a rough approximation at 10%, it is far more reasonable than choice A which assumes that 100% of the remaining lots will get built.



\* The built count for year 2015 was increased to compensate for a partial year.

The fields in the above table are defined as follows.

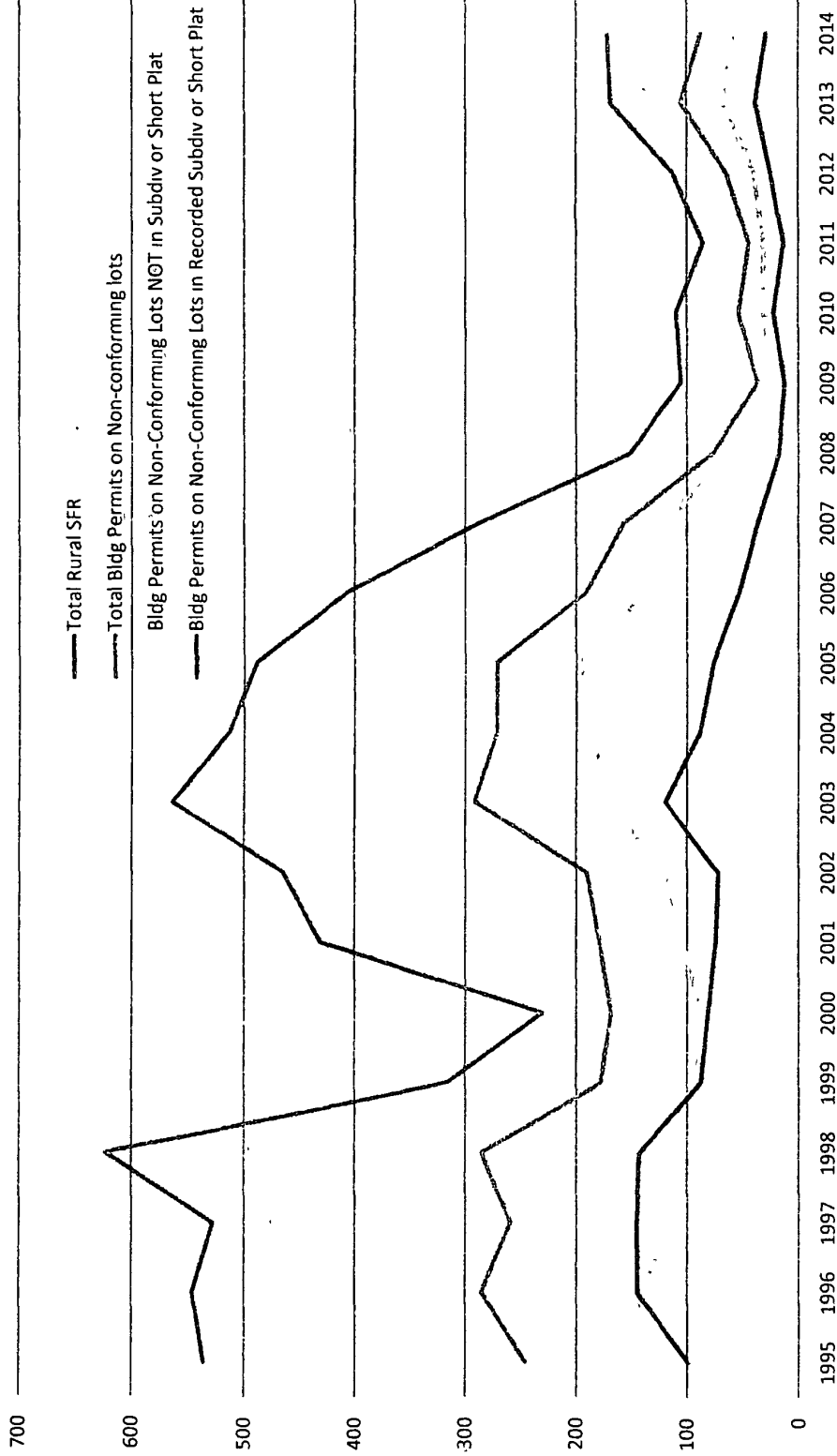
built\_cnt = the total number of nonconforming parcels built that year.

available = the remaining number of nonconforming parcels

perc\_dev = the percentage of available nonconforming parcels built that year

EXHIBIT 4

### Rural SFR Bldg Permits (1995-2014)



Year	Rural SFR Bldg Permits
1995	536
1996	546
1997	528
1998	623
1999	315
2000	230
2001	431
2002	465
2003	564
2004	513
2005	488
2006	406
2007	286
2008	150
2009	105
2010	109
2011	85
2012	112
2013	168
2014	171

Source Clark County Plan Monitoring Report, July 2000, Clark County Buildable Lands Report 2007, Clark County Buildable Lands Report 2015

Note 2007 Buildable Lands Report went midway through 2006 and the 2015 Buildable Lands Report began with the second half of 2006



Rural SFR Permits Issued on Non Conforming Lots 1995-2014													
Year	AG-20	FR-40	FR-80	RC-1	RC-2.5	R-10	R-20	R-5	UR-10	Total			
1995	51	12	36	1	3	28	6	106	3	246			
1996	57	13	37	0	1	33	5	124	15	285			
1997	39	33	25	0	2	29	4	108	19	259			
1998	38	29	46	1	0	32	6	115	18	285			
1999	33	18	15	1	0	20	7	72	11	177			
2000	16	12	20	3	7	23	4	75	8	168			
2001	30	16	28	0	3	15	9	73	4	178			
2002	24	12	19	1	3	34	10	85	2	190			
2003	53	15	46	2	2	38	7	122	6	291			
2004	39	17	42	2	2	40	8	113	8	271			
2005	42	15	49	2	4	32	15	108	4	271			
2006	17	8	28	1	1	18	6	103	9	191			
2007	15	4	40	0	0	9	6	80	2	156			
2008	11	3	11	0	0	11	4	33	3	76			
2009	5	2	8	0	0	3		15	3	36			
2010	4	0	5	2	0	6	5	27	4	53			
2011	6	0	5	0	0	9	1	23	0	44			
2012	8	3	2	0	0	6	5	38	2	64			
2013	11	4	17	3	0	11	2	56	1	105			
2014	11	1	11	0	0	9	4	50	1	87			
Total	510	217	490	19	28	406	114	1526	123	3,433			

Year	Rural SFR Permits on Non-Conforming Lots in Recorded Subdiv or Short Plat													
	AG-20	FR-40	FR-80	RC-1	RC-2.5	R-10	R-20	R-5	UR-10	Total				
1995	18	0	4	0	2	7	0	0	66	2	99			
1996	27	8	6	0	0	9	1	1	82	11	144			
1997	13	26	8	0	2	2	1	1	76	17	145			
1998	10	24	8	1	0	6	0	0	77	17	143			
1999	12	17	5	1	0	2	0	0	41	9	87			
2000	2	9	6	3	7	3	0	0	47	4	81			
2001	6	10	5	0	2	1	0	0	48	2	74			
2002	8	9	0	1	1	8	2	2	41	2	72			
2003	19	5	7	2	0	9	2	2	72	3	119			
2004	11	12	7	2	0	10	0	0	42	4	88			
2005	5	7	3	0	1	3	2	2	52	3	76			
2006	3	3	4	0	0	0	1	1	36	6	53			
2007	2	2	5	0	0	3	1	1	23	0	36			
2008	1	0	1	0	0	1	0	0	12	2	17			
2009	1	0	1	0	0	0	0	0	8	2	12			
2010	0	0	1	0	0	3	1	1	15	2	22			
2011	0	0	0	0	0	2	0	0	11	0	13			
2012	0	0	0	0	0	1	0	0	23	1	25			
2013	0	1	0	0	0	3	0	0	33	1	38			
2014	1	1	0	0	0	3	0	0	24	0	29			
Total	139	134	71	10	15	76	11	829	88	1,373				

Year	Rural SFR Permits on Non-conforming lots NOT in Recorded Subdiv or ShortPlat													Total
	AG-20	FR-40	FR-80	RC-1	RC-2.5	R-10	R-20	R-5	UR-10	Total				
1995	33	12	32	1	1	21	6	40	1	147				
1996	30	5	31	0	1	24	4	42	4	141				
1997	26	7	17	0	0	27	3	32	2	114				
1998	28	5	38	0	0	26	6	38	1	142				
1999	21	1	10	0	0	18	7	31	2	90				
2000	14	3	14	0	0	20	4	28	4	87				
2001	24	6	23	0	1	14	9	25	2	104				
2002	16	3	19	0	2	26	8	44	0	118				
2003	34	10	39	0	2	29	5	50	3	172				
2004	28	5	35	0	2	30	8	71	4	183				
2005	37	8	46	2	3	29	13	56	1	195				
2006	14	5	24	1	1	18	5	67	3	138				
2007	13	2	35	0	0	6	5	57	2	120				
2008	10	3	10	0	0	10	4	21	1	59				
2009	4	2	7	0	0	3	0	7	1	24				
2010	4	0	4	2	0	3	4	12	2	31				
2011	6	0	5	0	0	7	1	12	0	31				
2012	8	3	2	0	0	5	5	15	1	39				
2013	11	3	17	3	0	8	2	23	0	67				
2014	10	0	11	0	0	6	4	26	1	58				
Total	371	83	419	9	13	330	103	697	35	2,060				



**Draft Supplemental Environmental Impact Statement Alternatives**  
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Exhibit 5

Alternative	Option Description	Preferred Alternative?
<b>Alt. 1</b>	<b>NO ACTION ALTERNATIVE</b>	
1	The 'No Action' alternative. This option re-adopts the current plan, planning assumptions and moves the planning horizon out to 2035	Motion to Approve AYE – 6, NAY – 0 <b>Motion Passed</b>
<b>Alt. 2</b>	<b>COUNTY-INITIATED ALTERNATIVE</b>	
	<b>RURAL LANDS</b>	
2 a	<b>Rural Lands.</b> Change the comp plan map legend from three comp plan designations to one Rural designation to be consistent with current comp plan-to-zoning matrix table	Motion to Approve AYE – 6, NAY – 0 <b>Motion Passed</b>
2 b	<b>Agriculture Lands.</b> Change the minimum lot size for parcels zoned AG-20 from 20 acres to 10 acres (AG-10)	Motion to Deny AYE – 4, NAY – 2 <b>Motion Passed</b>
2 c	<b>Forest Lands.</b> Change the minimum lot size for parcels zoned FR-40 from 40 acres to 20 acres (FR-20)	Motion to Approve AYE – 2, NAY – 4 <b>Motion Failed</b>
2 d	<b>Rural Lands.</b> For parcels zoned R-20, from 20 acres to 10 acres, in some areas	<b>No Vote Taken</b>
2 e	<b>Rural Centers.</b> Combine rural center commercial (CR-2) and rural commercial (CR-1) into a single comp plan designation of 'rural commercial'	Motion to Approve AYE – 5, NAY – 1 <b>Motion Passed</b>
2 f	<b>Urban Reserve.</b> Urban reserve (UR) becomes a true overlay Zoning defaults to underlying zone, some parcels given R-5 zoning; UR code moved to the overlay chapter of Title 40. No change in allowable land uses.	Motion to Approve AYE – 5, NAY – 1 <b>Motion Passed</b>
	<b>URBAN LANDS</b>	
2.g	<b>Commercial Lands.</b> Combine the three commercial zones (C-2, C-3 and GC) into a single comp plan (C) designation.	Motion to Approve AYE – 5; NAY – 1 <b>Motion Passed</b>
2 h	<b>Public Facilities.</b> Creation of public facilities zone	Motion to Approve



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		AYE – 6; NAY – 0 <b>Motion Passed</b>
2 i	<b>Urban Holding.</b> Urban holding (UH) becomes a true overlay. Zoning defaults to underlying zone UH code moved to the overlay chapter of Title 40. No change in allowable land uses	Motion to Approve AYE - 5, NAY – 1 <b>Motion Passed</b>
2 j	<b>Battle Ground UGA.</b> Changes comp plan and zoning designations to better reflect surrounding land uses	Motion to Approve AYE – 6, NAY – 0 <b>Motion Passed</b>
2.k	<b>Ridgefield UGA.</b> Add the Tri-Mountain Golf Course to the Ridgefield UGA retaining Parks and Open Space (P/OS) zoning and adding an Urban Holding UH-20 overlay	Motion to Approve AYE – 6, NAY – 0 <b>Motion Passed</b>
2 l	<b>Vancouver UGA.</b> Remove reference to the Three Creeks Special Planning Area	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>
2 m	<b>Vancouver UGA.</b> Approve the Discovery/Fairgrounds subarea comp plan map and zoning changes	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>
2 n	<b>Vancouver UGA.</b> Approve the Salmon Creek subarea comp plan map and zoning changes.	Motion to Approve AYE – 6, NAY – 0 <b>Motion Passed</b>
2 o	<b>Vancouver UGA.</b> Change some parcels that have a mixed use comp plan designation to a comp plan designation that matches current zoning	Motion to Approve AYE – 6; NAY – 0 <b>Motion Passed</b>
2 p	<b>Vancouver UGA.</b> Remove UR adjacent to the Vancouver UGA and replace it with R-5 and AG-20 zoning	Motion to Approve AYE – 5, NAY – 1 <b>Motion Passed</b>
2 q	<b>Vancouver UGA.</b> Remove UH in the Fisher Swale area between Vancouver and Camas.	Motion to Approve AYE – 6, NAY – 0 <b>Motion Passed</b>
2.r	<b>Washougal UGA.</b> Correct mapping error on parcels with city zoning inside the UGA but outside city limits	Motion to Approve AYE – 6, NAY – 0 <b>Motion Passed</b>



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<b>Alt. 3 CITY-REQUESTED UGA EXPANSIONS</b>		
3 a	<b>Battle Ground.</b> Add 80 acres, now designated R-5, to the UGA for jobs	Motion to Approve AYE – 6, NAY - 0 <b>Motion Passed</b>
3 b	<b>La Center.</b> Add 17 acres, now designated R-5, for a school site	Motion to Approve AYE – 6, NAY – 0 <b>Motion Passed</b>
3 c	<b>La Center.</b> Add 56 acres, now designated AG-20, for jobs	Motion to Approve AYE – 3; NAY – 3 – <b>TIE</b> <b>VOTE – No Recommendation</b>
3.d	<b>Ridgefield.</b> Add 111 acres, now designated AG-20, for residential.	Motion to Deny AYE – 5, NAY -1 <b>Motion Passed</b>
3 e	<b>Washougal.</b> Add 41 acres, now designated R-5, for residential	Motion to Approve AYE – 2, NAY – 3 ABSTENTION – 1 <b>Motion Failed</b>
<b>Alt. 4 RURAL AGRICULTURE AND FOREST LANDS CHANGES</b>		
4.a	<b>Rural Lands.</b> Eliminate R-10 and R-20 zones unless publicly owned property Create R-1 and R-2 5 zones Maintain R-5 zone.	Motion to Deny AYE – 5, NAY – 1 <b>Motion Passed</b>
4 b	<b>Agriculture Lands.</b> Eliminate AG-20 zone unless publicly owned property Create AG-5 and AG-10 zones	Motion to Deny AYE – 4, NAY – 2 <b>Motion Passed</b>
4 c	<b>Forest Lands.</b> Add FR-10 and FR-20 zones to existing FR-40 and FR-80 zones	Motion to Approve AYE – 2; NAY – 4 <b>Motion Failed</b>
<b>OTHER RECOMMENDATIONS</b>		
	A <b>Motion</b> was made for the councilor's to allow for a process for flexibility and opportunity for land owners who continuously owned	Motion to Approve AYE – 4; NAY 2 <b>Motion Passed</b>



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	<p>property prior to the 1994 plan to possibly divide their property. The vote was 4-2 to approve. There was discussion as to whether the effort, discussion of the process will come to the PC work session, meetings, etc.</p>	
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**NOTICE OF PUBLIC HEARING  
BOARD OF CLARK COUNTY COUNCILORS**

**NOTICE IS HEREBY GIVEN** that the Board of Clark County Councilors will conduct a public hearing on **TUESDAY, November 24, 2015, at 10:00 a.m.**, at the **Clark County Public Service Center, 1300 Franklin, Vancouver, WA**, to consider the following

**DECISIONS RELATED TO THE 2016 COMPREHENSIVE PLAN UPDATE**

Clark County is updating its comprehensive plan to meet the 2016 Growth Management Act deadline. As part of the update process, the county is required to analyze the impacts of growth alternatives through the SEPA process. The county re-adopted the environmental impact statement (EIS) prepared for the 2007 update and prepared a draft supplemental EIS (DSEIS) to analyze four (4) potential growth options for the 2016-2035 time horizon.

The Board and the Planning Commission held a joint public hearing on the DSEIS on September 3 and 10. On September 17, the Planning Commission decided on a preferred alternative to recommend to the Board. On October 20, the Board held a hearing on the Planning Commission recommendation. The Board elected to continue that hearing to November 24 and to expand the scope as follows:

The Board will consider and may take action on a broad range of options and revisions related to the comprehensive plan and related documents including revisions to the planning assumptions, VBLM methodology, population projections, urban/rural split ratio, corrections to the SEIS, revised maps, documents to be included or excluded from the comprehensive plan, and the definition of a preferred alternative.

Revised maps of Alternative-4 and additional documents relating to planning assumptions and population projections have been posted on the county website under the October 20 Public Hearing entry of the Grid at <http://clark.wa.gov/thegrid/>

The Board will take public testimony on all of these considerations before making decisions on these matters, adopting a preferred alternative and associated zoning maps, and authorizing a final SEIS to be prepared consistent with those decisions.

**Staff Contact:** Oliver Orjiako (360) 397-2280, Ext. 4112  
Gordy Euler (360) 397-2280, Ext. 4968

**Email:** [oliver\\_orjiako@clark.wa.gov](mailto:oliver_orjiako@clark.wa.gov)  
[gordon\\_euler@clark.wa.gov](mailto:gordon_euler@clark.wa.gov)

The staff report, related materials and hearing agenda will be available 7 days prior to the hearing date on the county's web page at <http://www.clark.wa.gov/thegrid/>. Copies are also available at Clark County Community Planning, 1300 Franklin Street, 3<sup>rd</sup> Floor, Vancouver, Washington.

Anyone wishing to give testimony in regard to this matter should appear at the time and place stated above. Written testimony can be provided to the Board of Clark County Councilors by e-mailing the clerk of the board at [Rebecca.Tilton@clark.wa.gov](mailto:Rebecca.Tilton@clark.wa.gov) or mail to the Clark County BOCC, c/o Rebecca Tilton, PO Box 9810, Vancouver, WA 98666-9810. Written testimony should be received at least two (2) days prior to the hearing date for review.

Approved as to Form only

ANTHONY F. GOLIK  
Prosecuting Attorney

By \_\_\_\_\_  
Christine Cook, Sr. Deputy Prosecuting Attorney

**PLEASE PUBLISH: Wednesday, November 4, 2015**  
Please Bill Clark County Community Planning  
Attn: Sonja Wiser, Administrative Assistant  
P O Box 9810  
Vancouver, WA 98666-9810

**Reflector Account 29111269**  
**Columbian Account 70914**

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The purpose of the hearing is for the Board to continue to take public testimony on the Planning Commission recommendation for a preferred alternative (continued from October 20, 2015), and for the Board to discuss other changes to planning assumptions and/or alternatives presented in the EIS process. The Board will select a preferred alternative, and a final SEIS will be prepared on that alternative.

**Staff Contact:** Oliver Orjako (360) 397-2280, Ext. 4112  
Gordy Euler (360) 397-2280, Ext. 4968  
**Email:** [oliver.orjako@clark.wa.gov](mailto:oliver.orjako@clark.wa.gov)  
[gordon.euler@clark.wa.gov](mailto:gordon.euler@clark.wa.gov)

The staff report, related materials and hearing agenda will be available 7 days prior to the hearing date on the county's web page at <http://www.clark.wa.gov/thegrid/>. Copies are also available at Clark County Community Planning, 1300 Franklin Street, 3<sup>rd</sup> Floor, Vancouver, Washington.

Anyone wishing to give testimony in regard to this matter should appear at the time and place stated above. Written testimony can be provided to the Board of Clark County Councilors by e-mailing the clerk of the board at [Rebecca.Tilton@clark.wa.gov](mailto:Rebecca.Tilton@clark.wa.gov) or mail to the Clark County BOCC, c/o Rebecca Tilton, PO Box 9810, Vancouver, WA 98666-9810. Written testimony should be received at least two (2) days prior to the hearing date for review.

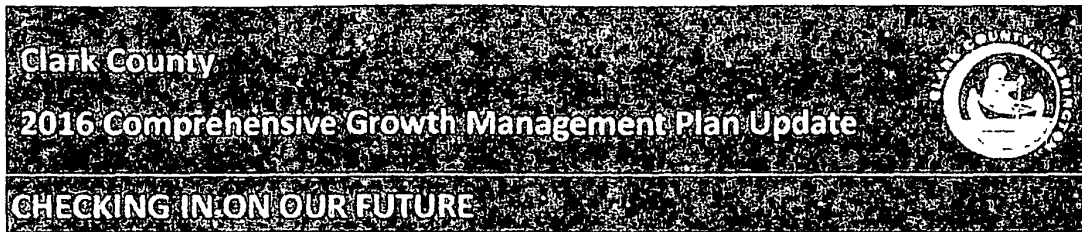
Approved as to Form only

ANTHONY F. GOLIK  
Prosecuting Attorney

By \_\_\_\_\_  
Christine Cook, Sr. Deputy Prosecuting Attorney

**PLEASE PUBLISH: Wednesday, November 4, 2015**  
Please Bill Clark County Community Planning  
Attn Sonja Wiser, Administrative Assistant  
P O Box 9810  
Vancouver, WA 98666-9810

**Reflector Account 29111269**  
**Columbian Account 70914**



# Exhibit A – Planning Assumption Choices Rev 1.09

An Evidence Based Proposal to the Community  
11/18/2015

This document focuses primarily on the rural assumptions of the 2016 Comp Plan update, particularly Alternative 1 and Alternative 4. The proposal contrasts existing choice A with the proposed choice B and provides the factual basis for each. Table 1 provides the assumptions that define the methods for calculating the capacity for rural parcels to accommodate population growth. Table 2 provides the general planning assumptions for population growth, accommodating that growth, GMA considerations, and logical conclusions. The Reference Section provides relevant evidence, the historical basis, and supporting calculations for the two assumptions tables. The purpose of this document is to present the compelling need to revise the original draft assumptions with more accurate, appropriate, realistic, and evidence based assumptions and to apply the insight gained from staff, cities, citizens, the GIS database, and actual historical records to the planning methods and process. Rev 1.09 incorporates the November 18, 2015 corrected Alt-4 Choice B Rural zone total.



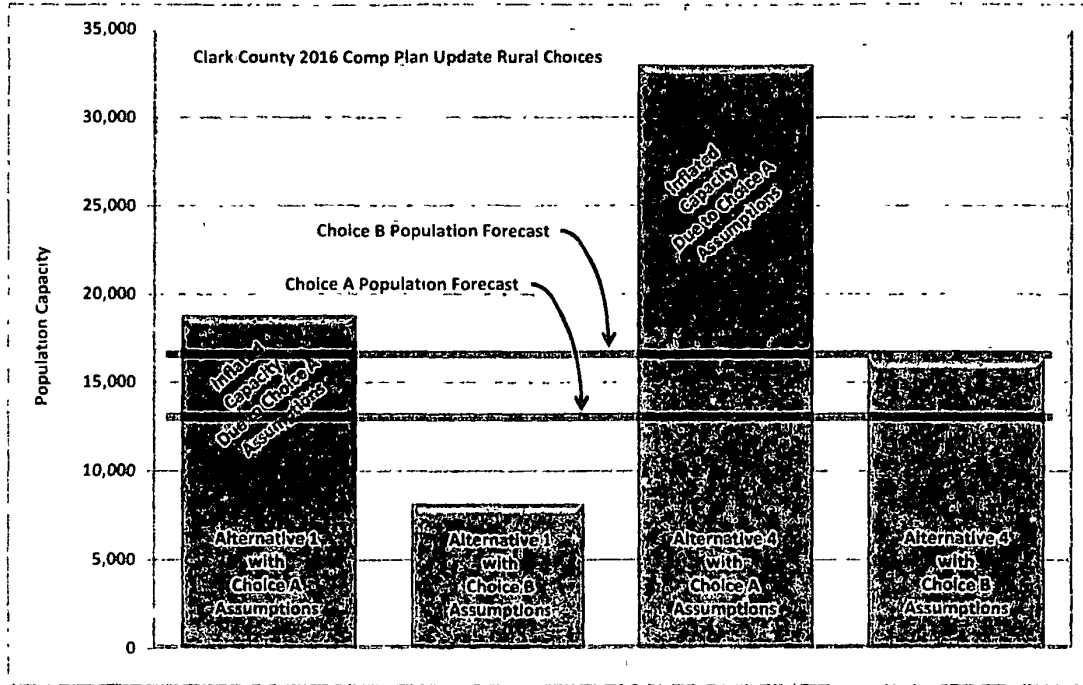
**Table 1: GIS Rural Vacant Buildable Lands Model (VBLM) Assumptions**

Ref	A (existing)	B (proposed)
1	Every possible rural parcel shall be counted as a parcel that will develop regardless of conditions that would likely make such development unlikely	These rural VBLM assumptions should be used not to reflect what is possible, but to reasonably plan for what is likely. Parcels that cannot reasonably be expected to develop should not be counted as parcels likely to develop. Cluster development remainder parcels that are known to be prohibited from further development should not be counted as parcels likely to develop.
2	Rural parcels located in areas far from basic infrastructure with continuous long term commercial forestry operations should be counted as parcels that will develop.	Parcels located in areas far from infrastructure with long term commercial forestry operations likely to continue should not be counted as likely to develop. These assumptions are not used to authorize or to prohibit the development of individual parcels. Rather, these assumptions should only be used for tallying parcel totals for general planning information.
3	Rural parcels including 100% of environmentally constrained areas that lack sufficient area for septic systems and well clearances shall be counted as rural parcels that will develop.	Rural parcels that have less than 1 acre of environmentally unconstrained land sufficient area for septic systems and well clearances should not be counted as likely to develop.
4	History shows that about 30% of dividable parcels with homes and 10% of vacant dividable parcels do not develop further. So those deductions have been applied to urban planning totals for years. But every rural parcel shall be counted as a parcel that will divide to the maximum degree possible.	History shows that about 30% of dividable parcels with homes and 10% of vacant dividable parcels do not develop further. So those deductions have been applied to urban planning totals for years. These same deductions should be applied to rural planning totals as well.
5	As long as county code allows, lots that are up to 10% smaller than the minimum lot size should be considered as conforming lots and counted as parcels likely to develop.	Same
6	Although county code prohibits most nonconforming parcels from developing, all nonconforming parcels with 1 acre shall be counted as rural parcels that will develop.	Due to some exceptions from the norm, 10% of nonconforming parcels with at least 1 acre of unconstrained area will likely develop.
7	A 15% urban Market Factor provides some margin for the law of supply and demand to comply with the GMA requirement to provide a sufficient supply and achieve the affordable housing goal. But a 0% Market Factor shall be used for rural areas.	A 7.5% rural Market Factor should be used to provide a reasonable margin for the law of supply and demand to comply with the GMA requirement to provide a sufficient supply and achieve the affordable housing goal. Implementation of this rural Market Factor is accomplished by deducting this percentage of parcels from the total available rural parcels. Note that this rural Market Factor is half of the urban Market Factor of 15% in order to also satisfy the GMA goal of reducing low density sprawl.
8	A 27.7% infrastructure deduction for infrastructure including roads, storm water, parks, schools, fire stations, conservation areas, lakes, streams, protected buffers, Etc. A 0% deduction shall be used for rural areas.	Same

**Table 2: Planning Assumptions**

Ref	A (existing)	B (proposed)
1	The 20 year urban population is forecasted to increase by 116,591	Same
2	The actual urban/rural split has consistently been 86/14 for decades. But a 90/10 split shall be used instead to lower the rural population growth forecast to only 12,955 persons	The actual urban/rural split has consistently been 86/14 for decades and is a viable policy option. The 1994 approved plan used 80/20. A more moderate policy of 87.5/12.5 forecasts 16,656 new rural persons for this plan update.
3	The annual county-wide population is forecasted to grow by 129,546 from 448,845 in 2015 to 578,391 in 2035 which calculates to an annual growth rate of 1.28%.	The county-wide population is forecasted to grow by 133,247 from 448,845 in 2015 to 582,092 in 2035. That is a 1.31% annual growth rate. That total is 0.6% higher than choice A. The annual rate is 0.03% higher than choice A.
4	The choice A assumptions assert that Alternative 1 would add 18,814 new persons in the rural area which is 45% more impact than necessary since choice A forecasts a need for 12,955 new persons in the rural area.	The choice B assumptions show that Alternative 1 can fit 8,182 new persons which is 51% too low. Thus Alternative 1 is not a viable option since it cannot comply with the GMA requirement to provide for the forecasted growth. (8,182 / 16,656)
5	The choice A assumptions assert that the original draft Alternative 4 map would add 32,987 new persons which is 155% more impact than necessary since choice A forecasts a need for 12,955 new persons in the rural area.	The choice B assumptions assert that the updated Alternative 4 map can accommodate 16,332 new rural persons. That falls within 2% of the forecasted rural population growth of 16,656 persons. Therefore, Alternative 4 is the appropriate choice.
6	No improvements or mitigations that were identified in the public process should be allowed. Each draft alternative must be accepted or rejected as is. Any revisions would require the process to start over and result in missing the required deadline.	The Alternative 4 updated maps include mitigations that increase the variety of lot sizes including AG-20, preserve large parcels near the UGBs for future employment, and better preserve the rural character. These revisions and planning assumptions should be allowed as proposed.
7	Cluster options are not necessarily included in any Alternative and therefore may not be available to preserve open space or large areas of habitat.	Rural cluster options are to be integrated into Alternative 4 within the limits of the law per previous direction given by the Board for R, AG, and FR zones to provide flexibility, to preserve open space, and to better provide for larger aggregated areas of habitat.
8	The existing Alternative-1 map defines 57% of existing R parcels as nonconforming, 76% of existing AG parcels as nonconforming, and 89% of existing FR parcels as nonconforming. It is not realistic since it does not fit the already developed patterns that actually exist.	The updated Alternative-4 map should be adopted to correct the mismatch between Alternative 1 map and the already developed patterns that actually exist, to respect predominant lot sizes, to resolve some spot zoning problems, and to best accommodate the forecasted population.

**Graph 1: Rural Population Capacity and Forecast**



Note that the existing Comp Plan approved in 2008 planned for a rural population increase that was higher than both choice A and choice B. That 2008 Plan approved for 19,263 new people to be accommodated in the rural area. That plan also approved a higher county-wide population increase to 584,310 persons by the year 2024. – 2004-2024 Comp Plan, chapter 3, page 3-3.

It would be logically fallacious to assert that the proposed choice B with lesser rural population growth and rural impact is somehow not compliant with the GMA after the existing Comp Plan with higher numbers and more impact was approved and found to be GMA compliant.

Assumption choice A counts on developing significant percentages of environmentally constrained land and critical areas. In contrast, choice B better respects the environmentally constrained land and critical areas to better preserve the environment.

**Table 3: The Actual Urban / Rural split for the past 20 years**

Year	County-wide Population	Rural Population	Percent Rural Population	Urban / Rural Split
1995	279,522	43,254	15.5	84/16
1996	293,182	44,882	15.3	85/15
1997	305,287	46,409	15.2	85/15
1998	319,233	48,104	15.1	85/15
1999	330,800	49,429	14.9	85/15
2000	346,435	51,182	14.8	85/15
2001	354,870	52,002	14.7	85/15
2002	369,360	53,548	14.5	85/15
2003	375,394	54,146	14.4	86/14
2004	384,713	54,869	14.3	86/14
2005	395,780	56,009	14.2	86/14
2006	406,124	57,551	14.2	86/14
2007	414,743	58,608	14.1	86/14
2008	419,483	59,042	14.1	86/14
2009	424,406	59,623	14.0	86/14
2010	427,327	59,858	14.0	86/14
2011	432,109	60,544	14.0	86/14
2012	435,048	60,845	14.0	86/14
2013	443,277	61,489	13.9	86/14
2014	446,785	61,948	13.9	86/14

Source: Clark County Assessor GIS records:

The following table documents the actual capacity of the rural area to accommodate the potential population increase for Alternative 1 and Alternative 4 using proposed choice B assumptions compared to the existing choice A assumptions considered in the DSEIS. The revised Alternative 4 map with Choice B assumptions is the proposed Choice B policy.

**Table 4: Rural Capacity to Accommodate Population Growth**

	Alt-1 Capacity per DSEIS Choice A (existing)	Alt-1 Actual Capacity Choice B (proposed)	Alt-4 Capacity per DSEIS Choice A (existing)	Alt-4 Actual Capacity Choice B (proposed)
Rural Zone	5,684	2,570	9,880	4,610
Agriculture Zone	970	286	1,958	733
Forest Zone	419	162	563	1,097
Nonconforming likely		183		74
Other Rural Zones		124		124
Gross potential growth home sites	7,073	3,325	12,401	6,638
7.5% Market Factor deduction	0	-249	0	-498
Net potential growth of home sites	7,073	3,076	12,401	6,140
Potential population growth	18,814	8,182	32,987	16,332

Source: Clark County GIS:

**Correcting the population growth planning assumptions:**

The following table lists the population, growth rates, and urban/rural split options for resolving the differences between the tables in the DSEIS, the adopted resolutions, and planning assumptions. Reference 4 is proposed Choice B policy.

**Table 5: Variations in Population Forecast Documentation**

Ref	Starting population in the year 2015	20-year county-wide population projection	Planned county-wide population growth	Planned urban population growth	Planned rural population growth	Stated annual growth rate	Actual annual growth rate
1	448,845	578,391*	129,546*	116,591	12,955	1.12%*	1.28%
2	447,865	577,431*	129,566*	116,609	12,957	1.25%*	1.29%
3	448,815	577,431*	128,616*	115,754	12,862	1.26%*	1.27%
4	448,845*	582,092	133,247	116,591*	16,656	1.31%	1.31%

\* indicates a directly specified parameter that drives the other parameters.

The calculations for each of the table entries are as follows:

Ref 1: The most recent population growth projection was adopted on April 14, 2015 via resolution# 2015-04-05

<http://clark.wa.gov/thegrid/documents/2015-04-05.pdf>

2015 starting population = 578,391 – 129,546 = 448,845

The Urban/rural population growth split = 90% urban, 10% rural

2035 urban population growth = 129,546 \* 0.9 = 116,591

2035 rural population growth = 129,546 \* 0.1 = 12,955

County-wide annual growth rate = 578,391 / 448,845 = 1.2886208

The 20<sup>th</sup> root of 1.2886208 = 1.012759, annual growth rate = 1.28%

Ref 2: DSEIS table S-1 on page S-2

<http://clark.wa.gov/cgrid/images/DSEISTableS-1.JPG>

2015 starting population = 577,431 – 129,566 = 447,865

The Urban/rural population growth split = 90% urban, 10% rural

2035 urban population growth = 129,566 \* 0.9 = 116,609

2035 rural population growth = 129,566 \* 0.1 = 12,957

County-wide annual growth rate = 577,431 / 447,865 = 1.289297

The 20<sup>th</sup> root of 1.289297 = 1.012859, annual growth rate = 1.29%

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Ref 3: DSEIS table 1-1 on page 1-2

<http://clark.wa.gov/cgrid/images/DSEISTable1-1.JPG>

2015 starting population = 577,431 – 128,616 = 448,815

The Urban/rural population growth split = 90% urban, 10% rural

2035 urban population growth = 128,616 \* 0.9 = 115,754

2035 rural population growth = 128,616 \* 0.1 = 12,862

County-wide annual growth rate = 577,431 / 448,815 = 1.286568

The 20<sup>th</sup> root of 1.286568 = 1.0126786, annual growth rate = 1.27%

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Ref 4: Corrected starting population and urban population growth to original resolution# 2015-04-05 with 87.5/12.5 urban/rural split.

For 87.5/12.5 urban/rural population growth split, the numbers are as follows:

2035 urban population growth = 116,591 (from resolution# 2015-04-05).

Keeping the same urban growth, the rural population growth is calculated as follows, where X = the rural population growth:

$X = 116,591 * .125 / .875 = 16,656$

County-wide population growth = 116,591 + 16,656 = 133,247

County-wide 2035 population = 448,845 + 133,247 = 582,092

County-wide annual growth rate = 582,092 / 448,845 = 1.2968664

The 20<sup>th</sup> root of 1.2968664 = 1.01308238, annual growth rate = 1.31%



**Exhibit B**

**Rural Comparison of the 2004-2024 and the Proposed 2016-2035 Comp Plan Update**

Proposed Comp Plan changes should be based on compelling reasons and be understood in the context of already approved plans that have proven to be GMA compliant. The following documentation explains the compelling need to address the chronic problems that have plagued the rural community for more than 2 decades

The Comp Plan that was first adopted in 1994 created a gross mismatch between the actual ground-truth of already developed rural patterns and an unrealistic zoning map. Subsequent Comp Plan updates have failed to address the chronic mismatch problems.

The unrealistic zoning map persists to this day and would continue to persist if Alternative 1 was selected for this Comp Plan Update. The current rural zoning map is not reasonable as demonstrated by the gross mismatch between the existing rural community that actually exists for the three basic rural zones: R, AG, and FR. That zoning map creates the following problems:

**Table 1 – Mismatch between the existing rural zoning map and the real world**

<b>Rural zone</b>	<b>Proportion defined as non-conforming</b>
<b>R Zoned Parcels</b>	<b>6 out of 10</b>
<b>AG Zoned Parcels</b>	<b>8 out of 10</b>
<b>FR Zoned Parcels</b>	<b>9 out of 10</b>

This mismatch is not a result of the rural community creating nonconforming parcels. Rather, the mismatch was created by an incompatible zoning map that was created in 1994 that made them nonconforming. That mismatch continues to harm the rural community by increasing the cost and complexity of permits for the vast majority of rural citizens.

Further, such wide-spread negative impacts have restricted the reasonable improvements that would otherwise be appropriate for existing homes in the rural community. The needless extra cost and complexity of permits impacting the majority of rural citizens not only disregards the specific goals of listed in the GMA, but such an intolerable situation wars against those goals.

**Table 2 – Fulfilling the goals of the GMA:**

<b>GMA Goal</b>	<b>Alternative 1</b>	<b>Alternative 4</b>
<b>Affordable Housing</b>	<b>Higher cost.</b>	<b>Lower cost</b>
<b>Economic Development</b>	<b>Disadvantaged</b>	<b>Supported</b>
<b>Variety of rural densities</b>	<b>6 total</b> R: 5, 10, 20 AG:20 FR:40, 80	<b>10 total</b> R: 1, 2.5, 5 AG: 5, 10, 20 FR: 10, 20, 40, 80
<b>Property Rights</b>	<b>Diminished</b>	<b>Respected</b>
<b>Permits</b>	<b>Costly, burdensome, overly constrained</b>	<b>More affordable, straight forward, simpler, more flexible</b>

**Table 3 – Population Growth and Proposed Densities**

<b>Ref</b>	<b>2004-2024 Plan as approved in 2007</b>	<b>Proposed 2016-2035 Plan</b>	<b>Difference</b>
Forecasted Rural Population Growth	<b>19,264</b>	<b>16,656</b>	<b>13.6% less</b>
Rural Population Capacity	<b>19,132</b>	<b>16,332</b>	<b>14.7% less</b>
Forecasted Rural Parcel Growth	<b>7,438</b>	<b>6,262</b>	<b>15.8% less</b>
Forecasted Rural Parcel Growth	<b>7,387</b>	<b>6,140</b>	<b>16.9% less</b>
Planned County-wide Population Density (persons / Sq Miles)	<b>889</b> (584,310 / 656 6)	<b>887</b> (582,092 / 656 6)	<b>same</b>
Planned Urban Population Density (persons /-Sq Miles)	<b>3184</b> ((328,123 + 173,371) / 157 5)	<b>3224</b> ((386,640 + 116,591) / 156 1)	<b>1.26% more</b>
Planned Rural Population Density (persons /-Sq Miles)	<b>166</b> ((63,552 + 19,264) / 499.1)	<b>158</b> ((62,205 + 16,656) / 500 5)	<b>4.8% less</b>

The above calculations for population densities are based on the following area facts.

**Table 4 – Population Growth and Proposed Densities**

Square Miles	<b>2004-2024 Base Year</b>	<b>2016-2035 Base Year</b>
County-wide	<b>656.6</b>	<b>656.6</b>
Urban (cities + UGAs)	<b>157.5</b>	<b>156.1</b>
Rural	<b>499.1</b> (500.6 – 157.5)	<b>500.5</b> (656.6 – 156.1)

**Show your work:**

The following show how the forecasted population numbers were calculations based upon GIS data

Per the 2007 plan for the target 2024

County-wide population  $391,675 + 192,635 = 584,310$

Urban Population:  $328,123 + 173,371 = 501,494$

Rural population:  $63,552 + 19,264 = 82,816$

Per the proposed plan for the target 2035:

County-wide population  $448,845 + 133,247 = 582,092$

Urban Population:  $386,640 + 116,591 = 503,231$

Rural population:  $62,205 + 16,656 = 78,861$

**Exhibit B**

**What the proposed rural plan does:**

The proposal provides a more realistic and sensible plan that is consistent with the ground truth. In contrast to unlikely scenarios that may be theoretically possible, the proposal corrects unrealistic assumptions to better align with the more likely circumstances that can realistically be expected to unfold.

Rather than creating numerous small rural parcels, the proposed plan recognizes predominant parcels that already exist. That real-world ground-truth foundation serves as the predominant parcel size zoning that is appropriate for each area.

**What the proposed rural plan does not do:**

The proposed rural plan does not de-designate any resource land.

The proposal does not increase rural density compared to the existing plan approved in 2007. Rather, the above facts show, the proposal is for a lower rural density than the existing 2007 plan approved in as GMA compliant.

The proposal does not propose a higher rural population or more rural lots than the existing plan approved in 2007. Rather, the above facts show that the proposal forecasts a lesser rural population growth and accommodates few new persons than were planned by the existing plan approved in 2007 as GMA compliant.

**Conclusion:**

Some have argued that we cannot afford the time to correct the known problems and suggest that perhaps in 8 to 20 years, we can conduct in-depth studies to get it right. Some shrink back from the responsibility for fear of lawsuits and prefer to kick the can down the road because would be easier.

The GMA does not excuse counties from doing their due diligence or from fulfilling their responsibilities to complete the required task of submitting the most realistic and best plan for their community.

Every effort has been made to meet or exceed all appropriate processes. That investment should not be abandoned because it is too hard or too risky. In contrast, we can now select a concise and optimized plan and complete the task in the allotted time. Our community's future is worth the effort.

Clark County

2016 Comprehensive Growth Management Plan Update



CHECKING IN ON OUR FUTURE

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## 2016 Comprehensive Plan SEIS Preferred Alternative

Community Planning



Board of County Councilors Hearing, November 24, 2015

# Agenda

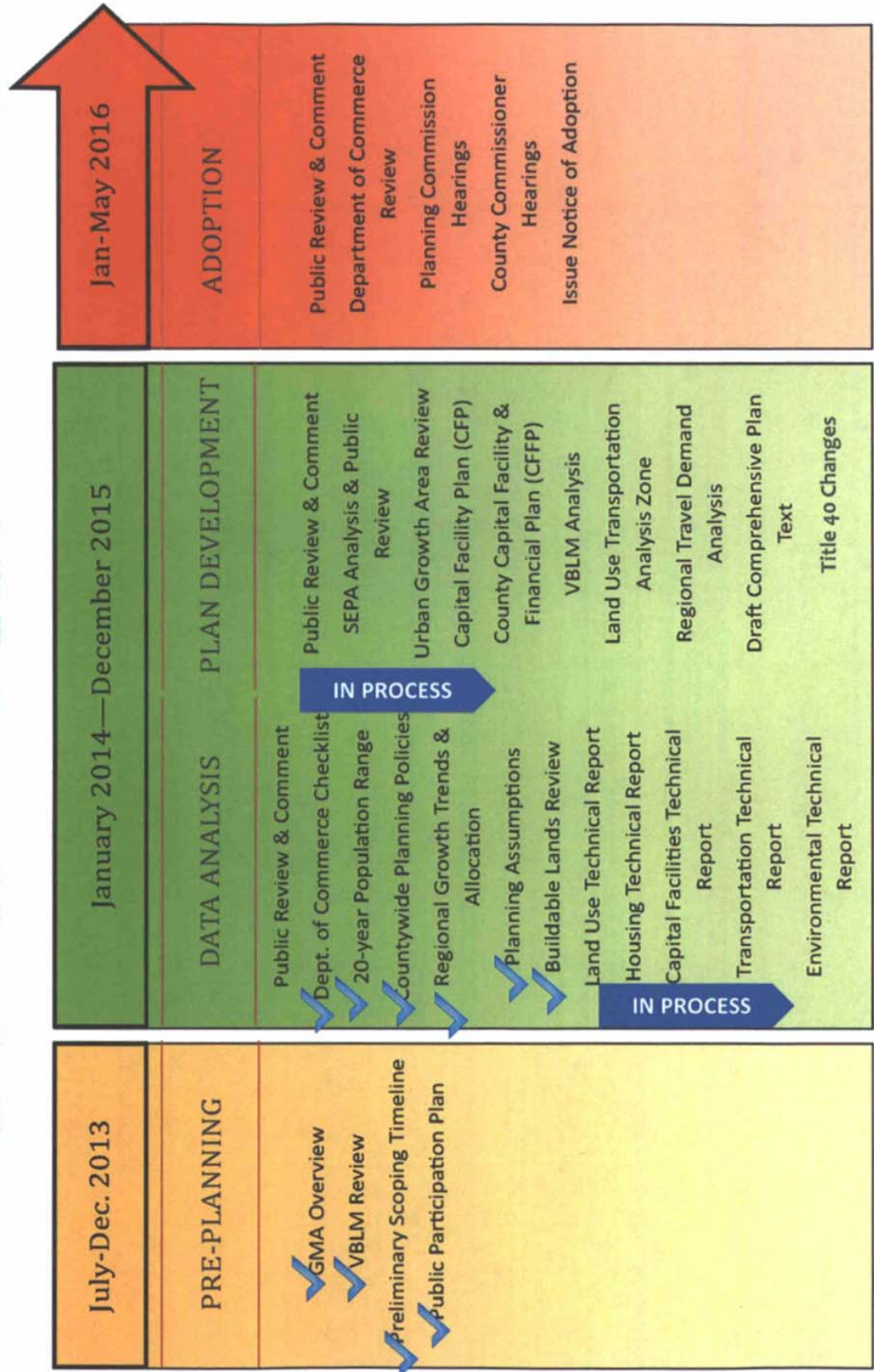
## Purpose of the hearing

- a. Continued hearing from Oct. 20 on the Planning Commission Recommendation on a preferred alternative
- b. Proposed Planning Assumptions and Revised Alternative 4 maps



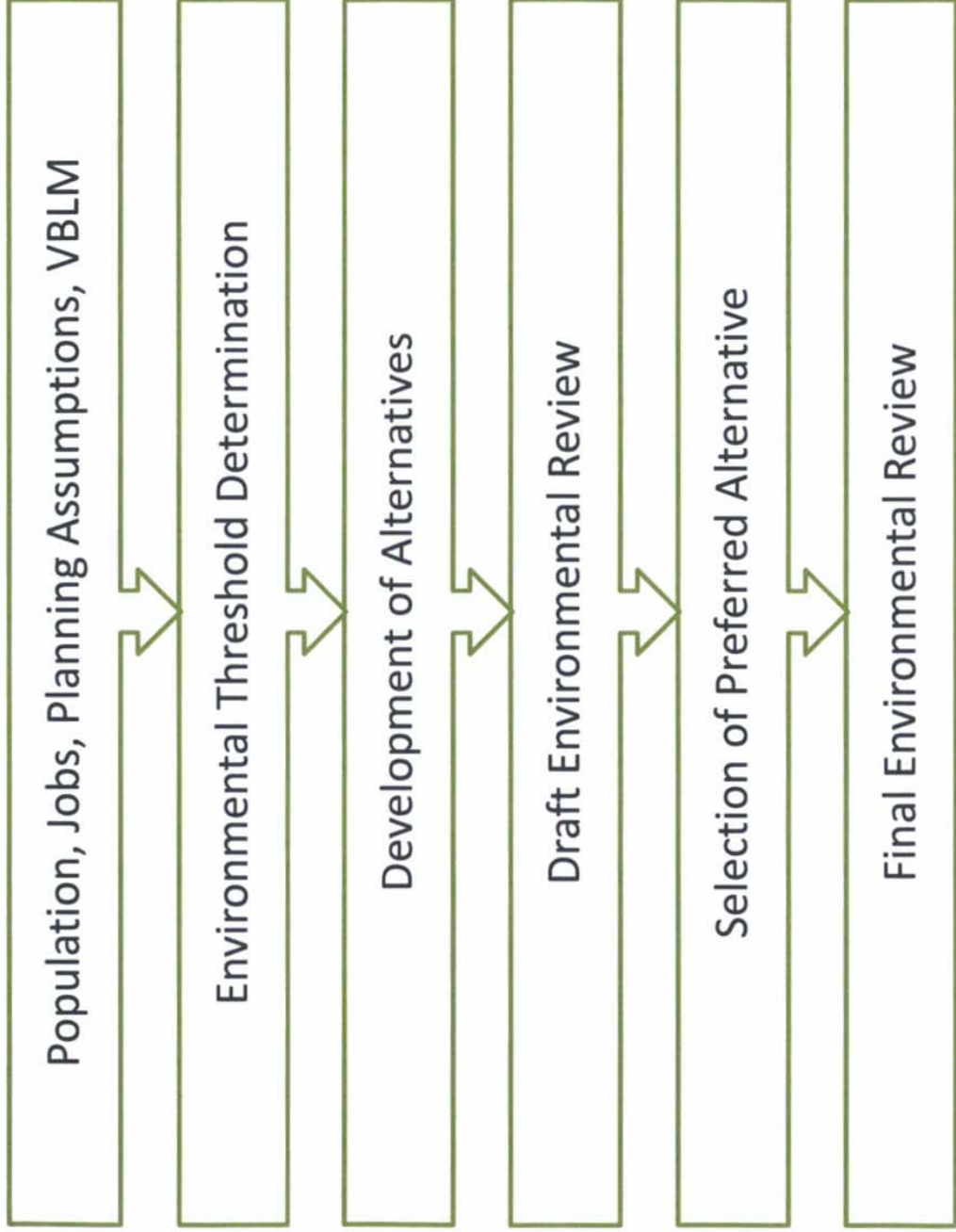


# Comprehensive plan progress to date





# Environmental Review

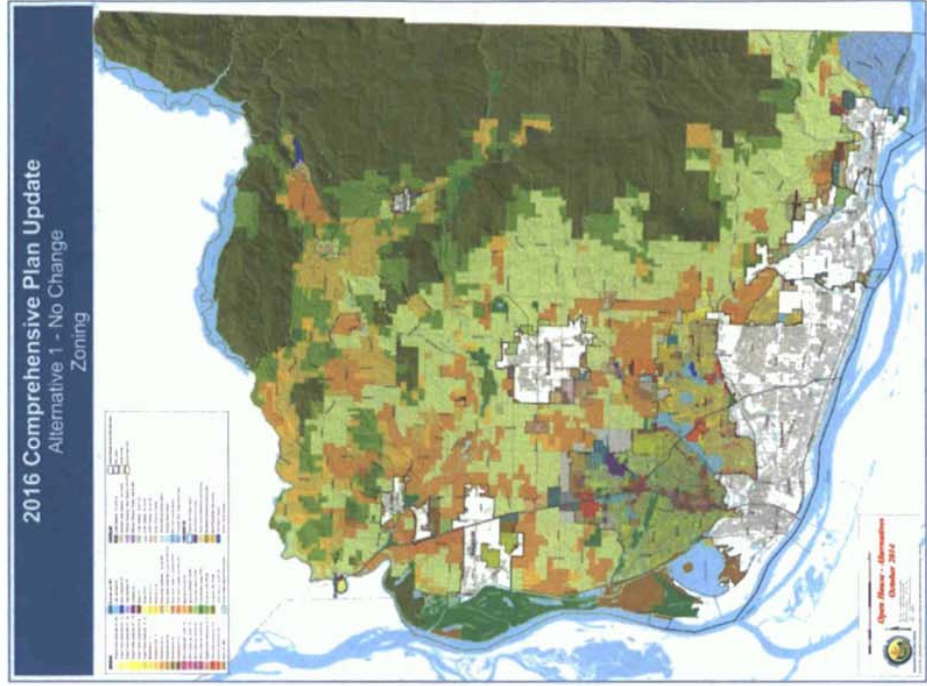
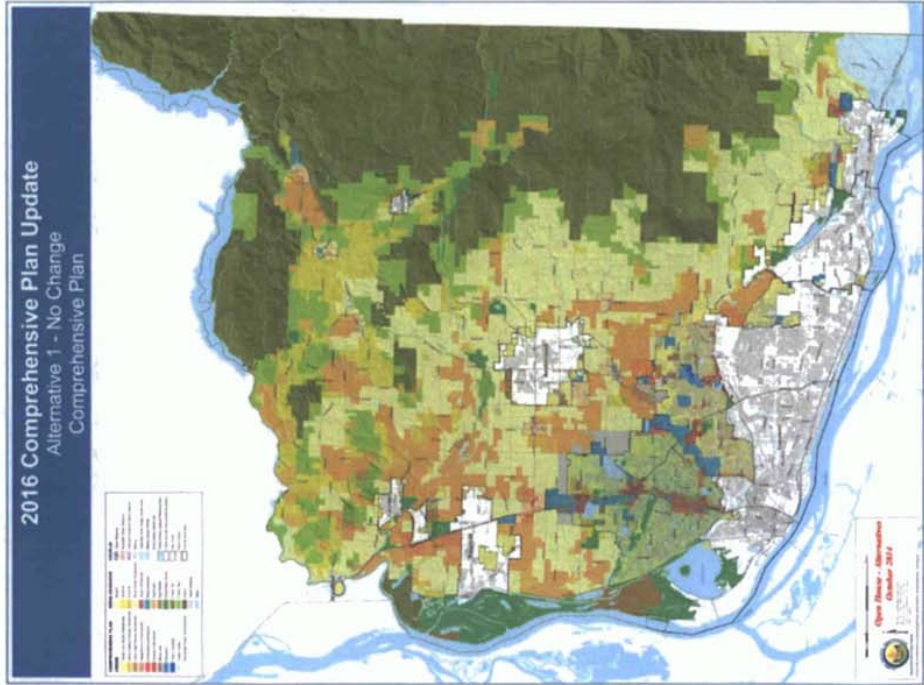


# SEIS Chronology

- July 30, 2014 Notice of scoping and adoption of 2007 FEIS
- Aug 19, 20, 27, 28 Scoping meetings
- Oct 27 Three alternatives agreed to by Board
- Oct 29, 30 Open Houses on Three Alternatives
- Jan 21, 2015 Board halts DSEIS process to develop new Alternative 4
- Mar 25, Apr 1 Open Houses on Four Alternatives
- Apr 14 Board approves four alternatives for study
- Aug 5 DSEIS issues
- Sep 3, 10 Joint PC/BOCC public hearings on DSEIS
- Sep 17 PC Deliberations
- Oct 20 BOCC Hearing to review Preferred Alternative
- Nov 9 Joint PC/BOCC worksession
- Nov 16, 17 Public Meetings on new proposed planning assumptions and revised Alternative 4
- Nov 19 PC Hearing on the proposals
- Nov 24 BOCC Hearing on PC Preferred Alternative

# Alternative 1 – No action

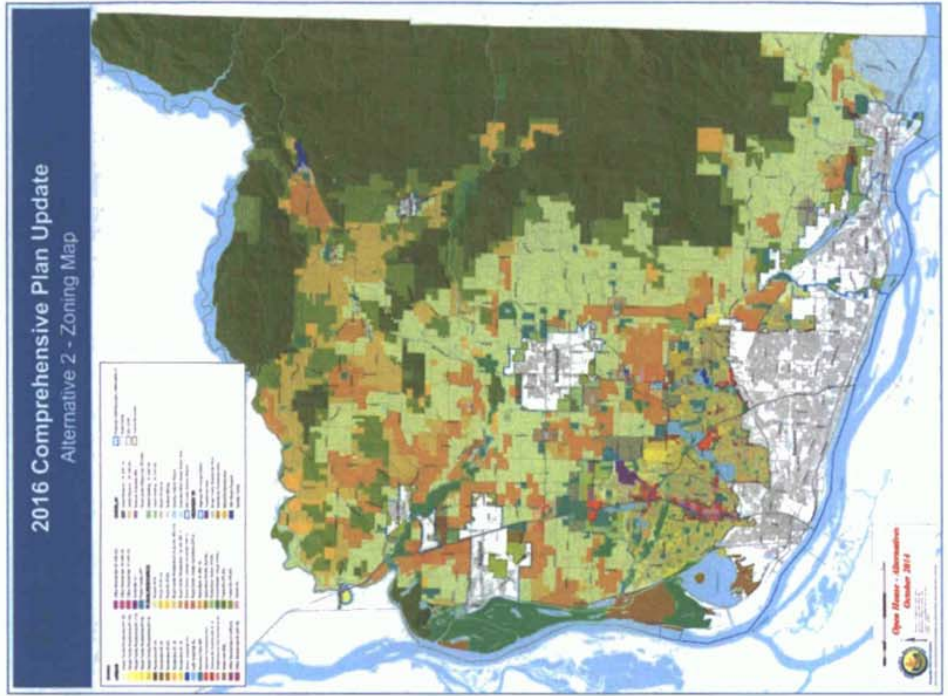
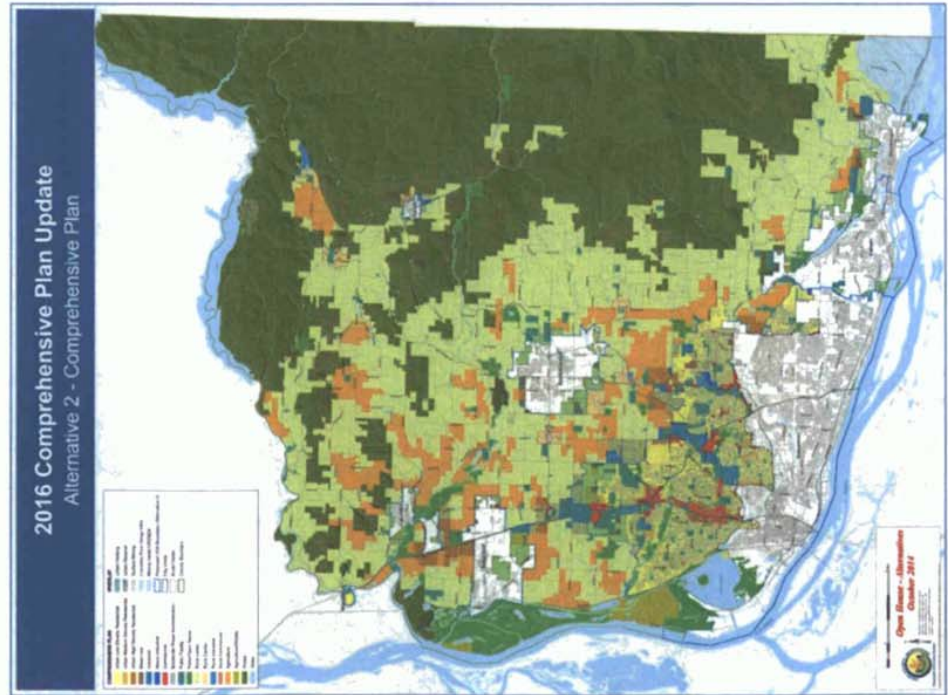
No Action Alternative would be the current Comprehensive Growth Management Plan, including current urban growth boundaries, planning assumptions, policies and implementation ordinances.





# Alternative 2

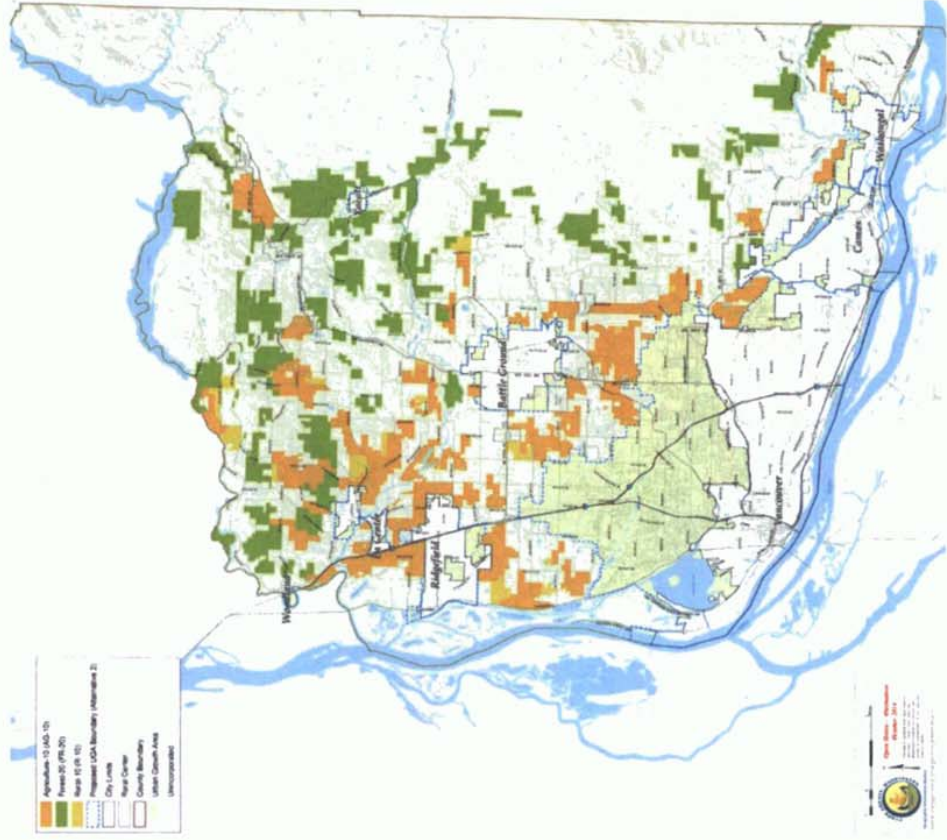
The Apr. 14, 2015 planning assumptions, policy direction, changes in land use/zoning, and principles and values defined by the commissioners are reflected in this alternative.



# Alternative 2

## 2.a Rural (R) Lands

- Change the comp plan map legend from three comp plan designations to one Rural (R) designation to be consistent with current comp plan-to-zoning matrix table.







# Alternative 2

## 2.e Rural Centers

- Combine rural center commercial (CR-2) and rural commercial (CR-1) into a single comp plan designation of 'rural commercial'.



# Alternative 2

## 2.f Urban Reserve

- Urban reserve (UR) becomes a true overlay. Zoning defaults to underlying zone; some parcels given R-5 zoning. UR code moved to the overlay chapter of Title 40. No change in allowable land uses.

# Alternative 2

## 2.g Commercial Lands

- Combine the three commercial zones (C-2, C-3 and GC) into a single comp plan (C) designation.

# Alternative 2

## 2.h Public Facilities

Creation of a Public Facilities comprehensive plan designation and zoning district. The district includes publicly owned facilities, i.e. schools, utilities and government buildings

### **Comprehensive plan map**

- The comprehensive plan map applies a Public Facilities (PF) designation to land owned by some public entities.

### **Zoning map**

- Changing to a new Public Facilities (PF) zone

# Alternative 2

## 2.i Urban Holding

- Urban holding (UH) becomes a true overlay. Zoning defaults to underlying zone. UH code moved to the overlay chapter of Title 40. No change in allowable land uses.





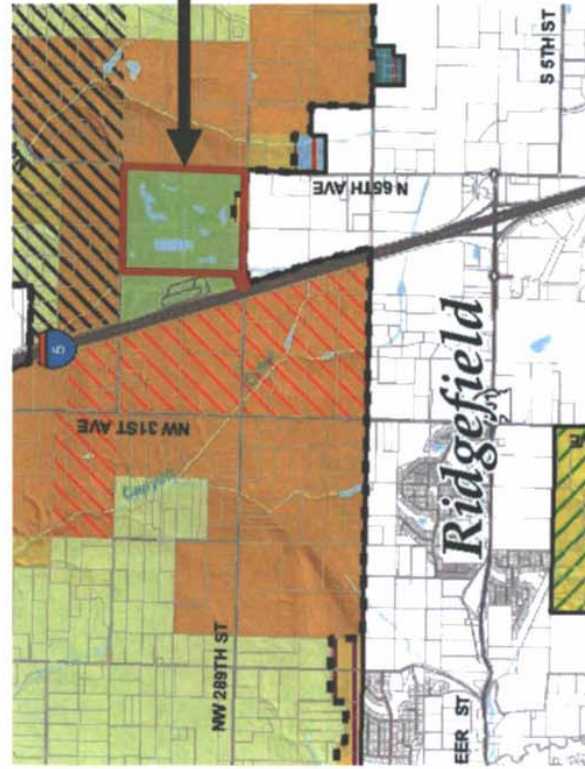
# Alternative 2

## 2.k RIDGEFIELD UGA

5 parcel expansion of Ridgefield Urban Growth Boundary including the Tri-Mountain Golf Course

**Comprehensive Plan map:** Retaining Parks and Open Space (P/OS) designation

**Zoning map**



Retaining Parks and Open Space (P/OS) zoning and adding an Urban Holding (UH-20) overlay



# Alternative 2

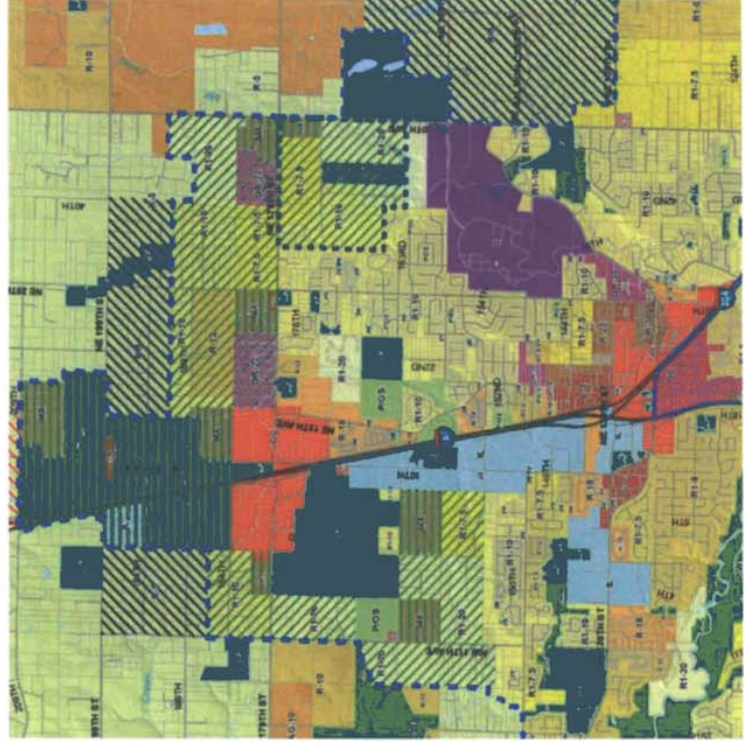
## 2.1-n VANCOUVER UGA

- Remove reference to the Three Creeks Special Planning Area
- Both the Discovery - Fairgrounds and Salmon Creek sub-area plan recommendations were developed by advisory groups composed of stakeholders from the specific area including property owners and leaders of major institutions.

Zoning map (current)



Zoning map (proposed)



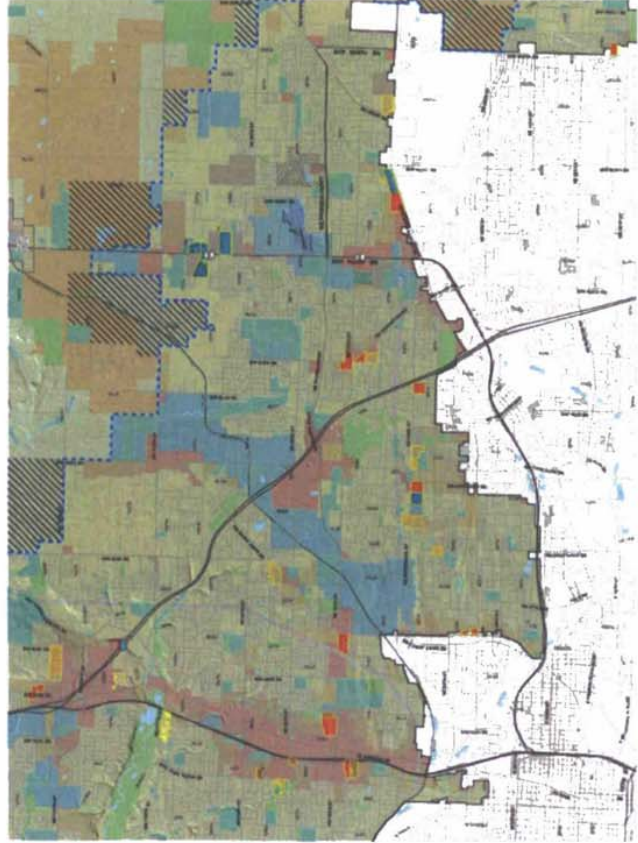
# Alternative 2

## 2.0 VANCOUVER UGA - MIXED USE

Application of appropriate comprehensive plan designation to match the actual zone in use instead of the mixed use

**Zoning map:** Retaining current zoning

### Proposed comprehensive plan map



Change from Mixed Use (MU) comp. plan designation to match the zoning

- Includes parcels outlined in yellow
- New comp. plan designations include:
  - Commercial
  - Industrial
  - Urban Low Residential
  - Urban Medium Residential
  - Urban High Residential



# Alternative 2

## 2.p URBAN RESERVE

Removal of Urban Reserve overlay in the north Salmon Creek area. This area provides a natural buffer to agriculture resource lands.

**Comp plan map:** Removal of Urban Reserve and application of Rural designation

### Zoning map



- Removal of Urban Reserve (UR-10) zone and application of Rural (R-5) on those parcels in gray with red outline
- Removal of Urban Reserve (UR-10) overlay and retaining Agriculture zoning

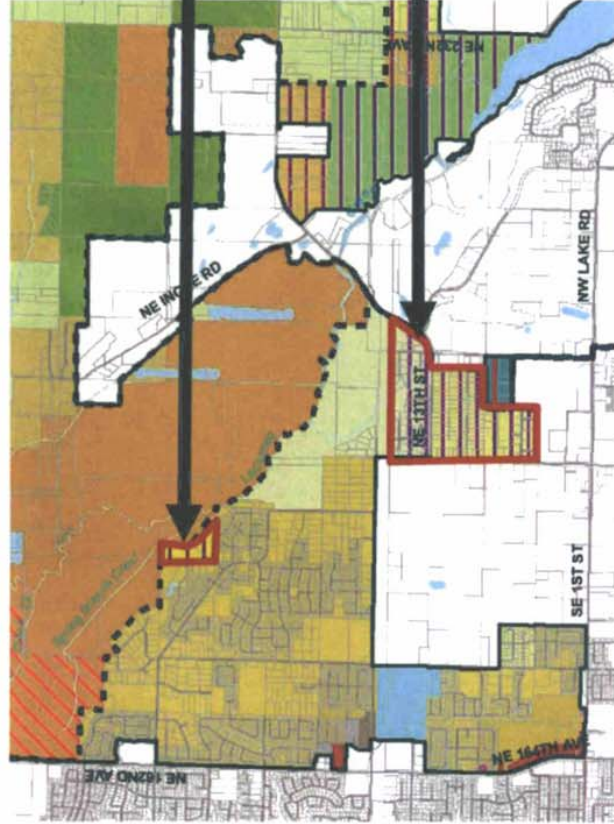
# Alternative 2

## 2.q URBAN HOLDING

Removal of Urban Holding designation in the Fisher's Swale area within the Vancouver Urban Growth Boundary – these areas are already developed and are served by infrastructure

**Comprehensive plan map:** Retaining Urban Low Residential designation

### Zoning map



Removal of Urban Holding-10 (purple stripes) and keep the Single-Family Residential zoning of (R1-20), (R1-10) and (R1-7.5)



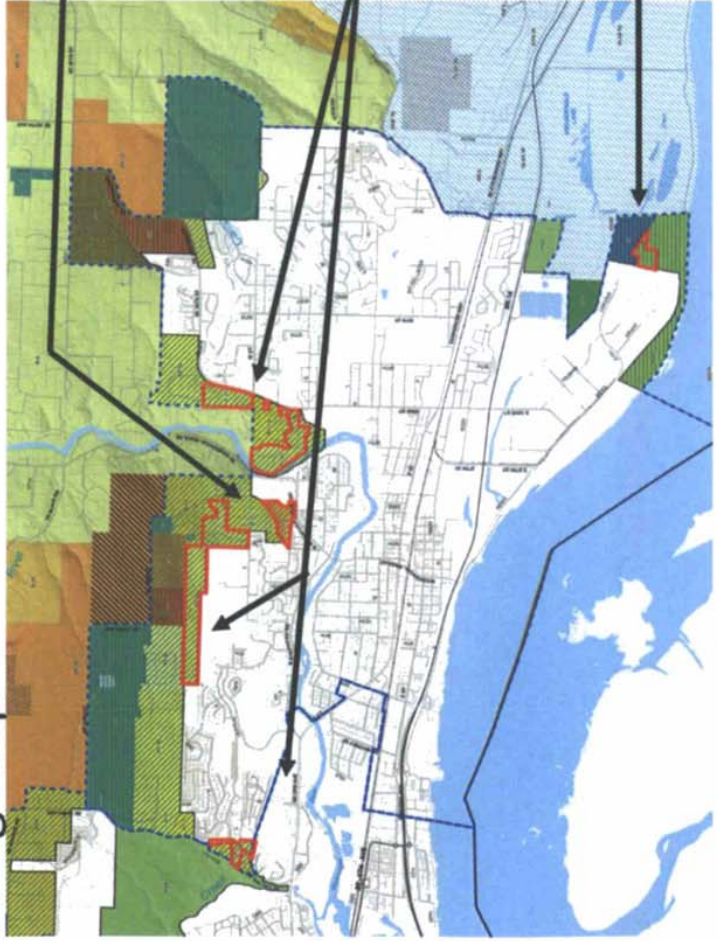
# Alternative 2

## 2.r WASHOUGAL UGA

Correcting an inconsistency between county and city zoning classifications

Comprehensive plan map : No change

Zoning map



Change from AR-16 (Washougal zoning) to R-18 (county zoning) and adding Urban Holding overlay

Change from R1-15 (Washougal zoning) to R1-10 (county zoning)

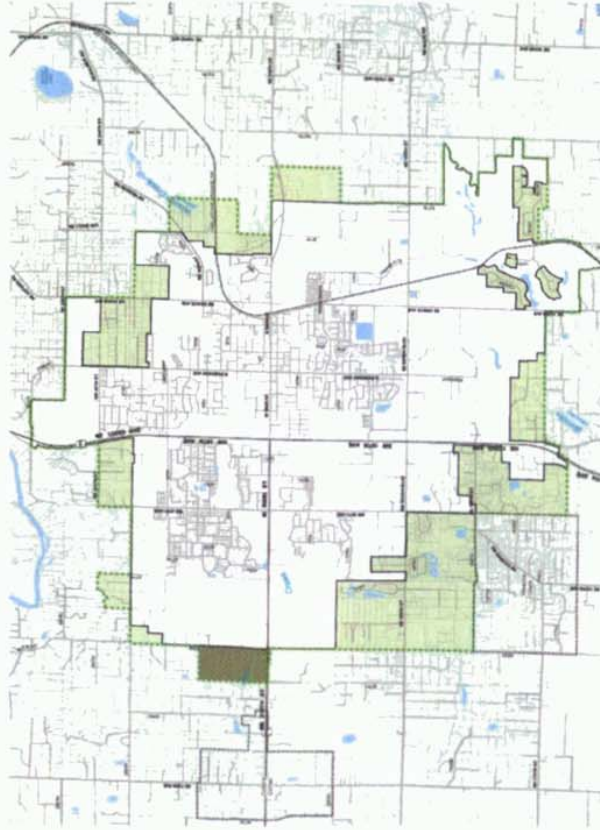
Steigerwald refuge: Heavy Industrial to Parks and Open Space. Apply Urban Holding (UH-20) to Steigerwald and property owned by Port.

# Alternative 3 – City initiated changes

The cities of Battle Ground and La Center are considering expanding their urban growth areas.

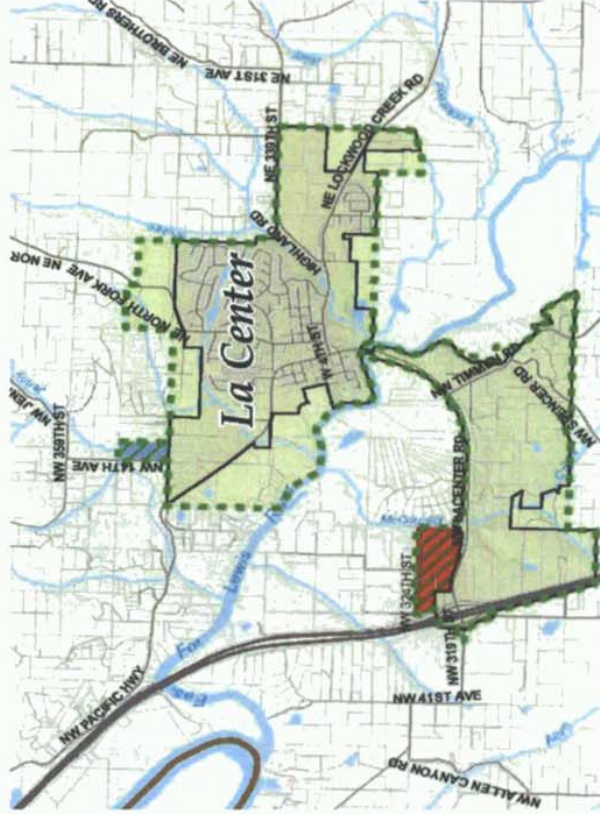
## 3.a Battle Ground UGA expansion

Proposed comp. plan designation of Mixed Use with Urban Holding overlay



## 3b-c La Center UGA expansion

Proposed comp. plan designation of Commercial with Urban Holding overlay and Public Facility for school



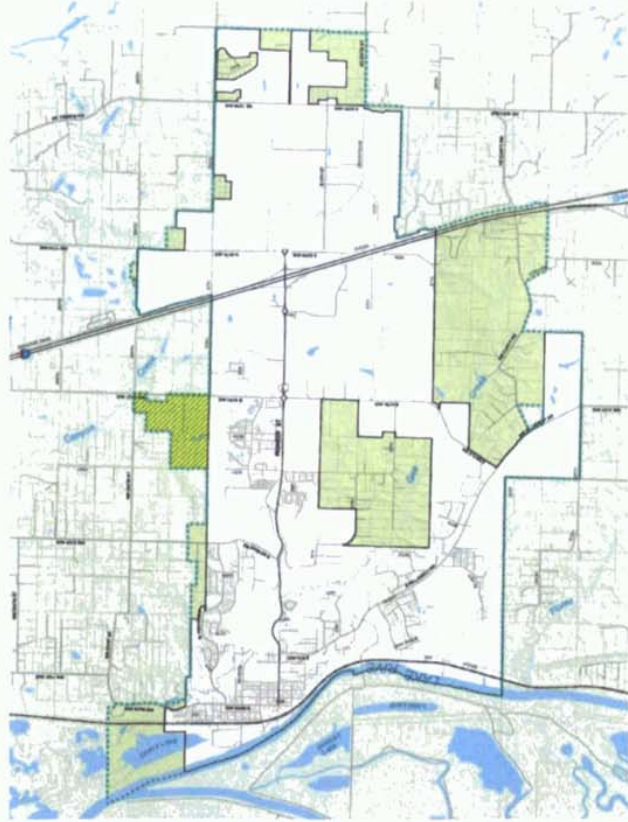


# Alternative 3 – City initiated changes

The cities of Ridgefield and Washougal are considering expanding their urban growth areas for residential.

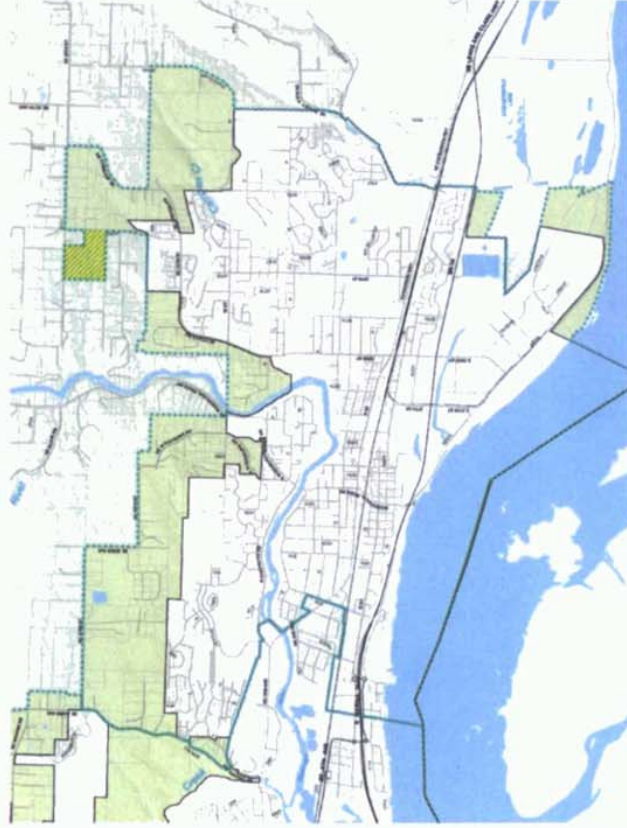
## 3.d Ridgefield UGA expansion

Proposed comp. plan designation of Urban Low Density Residential



## 3.e Washougal UGA expansion

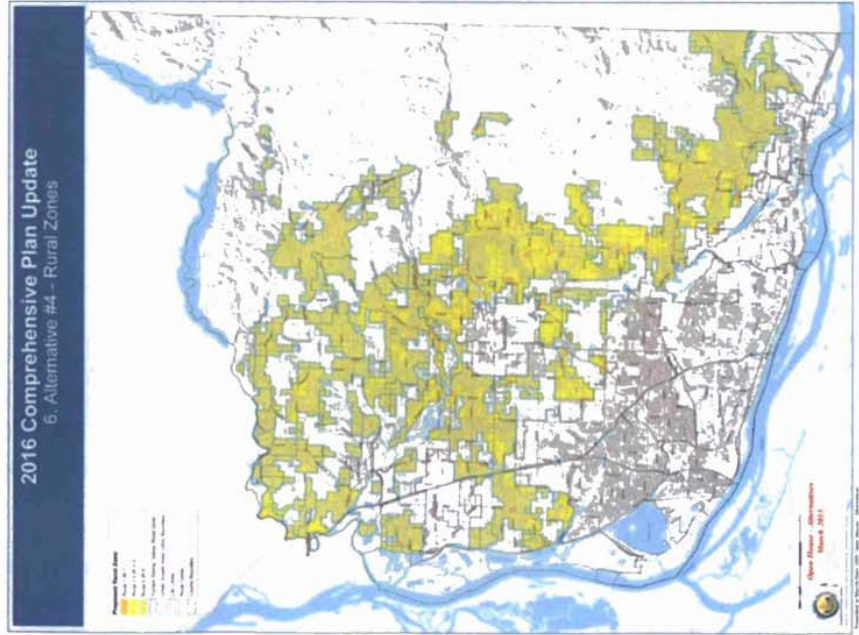
Proposed comp. plan designation of Urban Low Density Residential



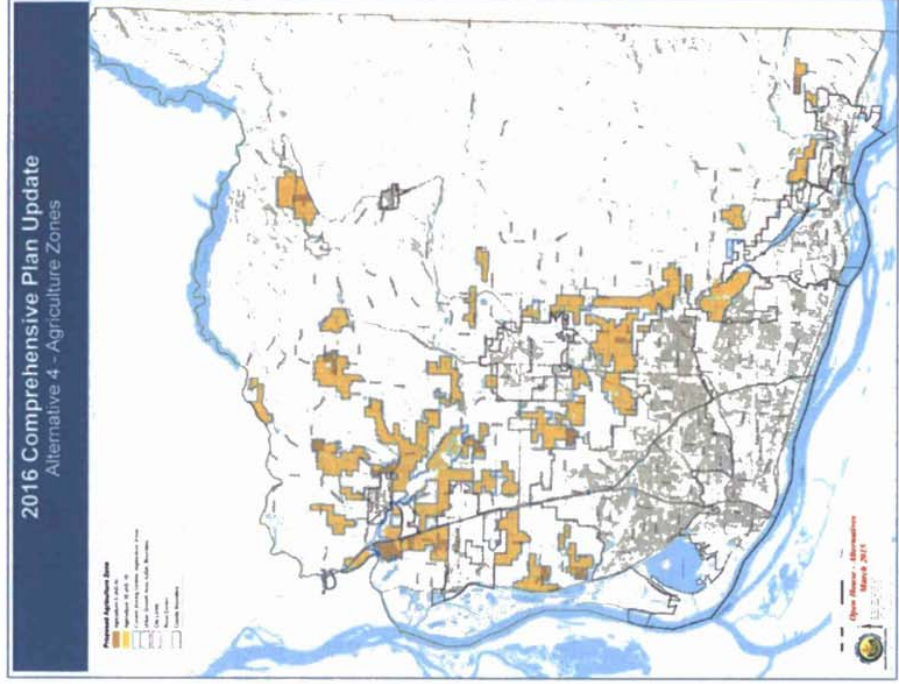
# Alternative 4

This alternative proposes changes to Rural and Resource lands.

4.a Rural Lands. Eliminate R-10 and R-20 zones. Create R-1 and R-2.5 zones. Maintain R-5 zone



4.b Agriculture Lands. Eliminate AG-20 zone. Create AG-5 and AG-10 zones.







# DSEIS Summary of Impacts by Alternative

Table 1-2. Potential New Lots Allowable Under Each Alternative

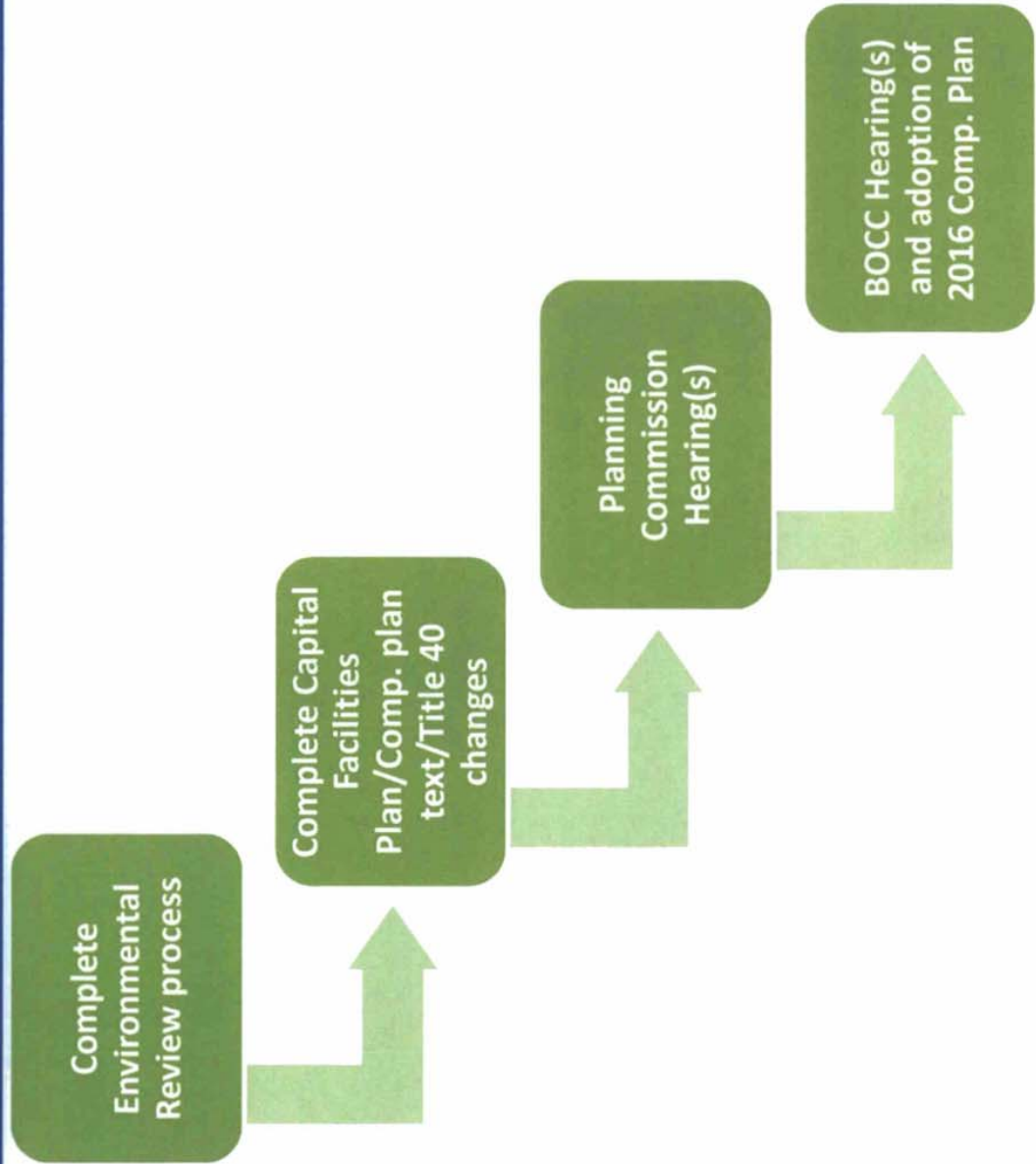
Zone	Alternative 1 – No Action Alternative	Alternative 2 – Countywide Modifications	Alternative 3 – City UGA Expansions	Alternative 4 – Rural, Agriculture, and Forest Expansion
Rural	5,684	5,823	5,672	9,880
Agriculture	970	1,937	952	1,958
Forest*	419	460	419	563
Total	7,073	8,220	7,043	12,401

Source: Clark County GIS, based on the Rural Vacant and Buildable Lands Model (VBLM) dated July 24, 2015

\* The Rural VBLM excludes property in the current use program for Timber and Designated Forest Land. This may underestimate the number of potential lots in Alternative 4.

\*\* This table does not include areas designated as Rural Center or Urban Reserve, nor does it include lots within UGAs.

# Remaining milestones



# Thank you!



[www.clark.wa.gov/planning/2016update](http://www.clark.wa.gov/planning/2016update)



RESOLUTION NO. 2015-11-16

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A RESOLUTION amending Resolution 2015-04-05 and other planning assumptions and policies relating to Clark County's comprehensive land use plan 2016 update pursuant to RCW 36.70A.

WHEREAS, the Board has diligently engaged in a thorough process involving numerous duly advertised public meetings including work session, open houses, and hearings, and;

WHEREAS, the Board took public testimony from interested parties, considered all the written and oral arguments and testimony, and considered all the comments presented to the Board; and

WHEREAS, the Board has considered and adopted an evolving set of assumptions, definitions, parameters, documents, maps, and policies based on a continually increasing body of knowledge provided by diligent research, historical records, arguments, testimony, comments, and a draft SEIS, and;

WHEREAS, these processes served to define, correct, refine, and optimize the draft assumptions and plans in order to incorporate identified improvements and to mitigate identified concerns, and;

WHEREAS, the Board at a duly advertised public hearing on November 24, 2015, finds that adoption will further the public health, safety and welfare; now therefore,

BE IT ORDERED AND RESOLVED BY THE BOARD OF COUNTY COUNCILORS OF CLARK COUNTY, STATE OF WASHINGTON AS FOLLOWS:

The Board hereby adopts choice B of Exhibit A to amend the previously adopted assumptions and policies for Clark County's comprehensive plan 2016 update.

Furthermore, the Board adopts Exhibit B to document the proposed rural forecasts and planned rural capacity as significantly more conservative than the approved 2004-2024 GMA compliant Comp Plan update.

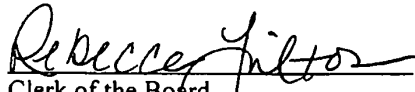
Exhibit A - Planning Assumption Choices - Rev 1.09  
Exhibit B - Rural Comparison of the 2004-2024 and the Proposed 2016-2035 Comp Plan Update

ADOPTED this 24th day of November, 2015.

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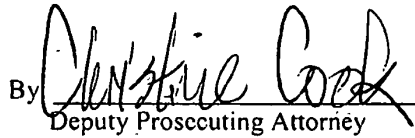
Attest:



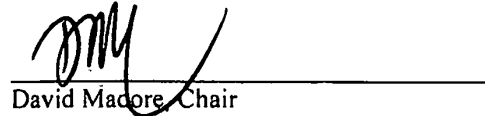
Clerk of the Board

**REVIEWED**  
**APPROVED AS TO FORM ONLY:**

Anthony F. Golik, Prosecuting Attorney

By   
Deputy Prosecuting Attorney

BOARD OF COUNTY COMMISSIONERS  
FOR CLARK COUNTY, WASHINGTON

  
David Madore, Chair

Jeanne E. Stewart, Councilor

Tom Mielke, Councilor



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Clark County

2016 Comprehensive Growth Management Plan Update



CHECKING IN ON OUR FUTURE

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## Exhibit A – Planning Assumption Choices

### Rev 1.09

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An Evidence Based Proposal to the Community

11/18/2015

This document focuses primarily on the rural assumptions of the 2016 Comp Plan update, particularly Alternative 1 and Alternative 4. The proposal contrasts existing choice A with the proposed choice B and provides the factual basis for each. Table 1 provides the assumptions that define the methods for calculating the capacity for rural parcels to accommodate population growth. Table 2 provides the general planning assumptions for population growth, accommodating that growth, GMA considerations, and logical conclusions. The Reference Section provides relevant evidence, the historical basis, and supporting calculations for the two assumptions tables. The purpose of this document is to present the compelling need to revise the original draft assumptions with more accurate, appropriate, realistic, and evidence based assumptions and to apply the insight gained from staff, cities, citizens, the GIS database, and actual historical records to the planning methods and process. Rev 1.09 incorporates the November 18, 2015 corrected Alt-4 Choice B Rural zone total.

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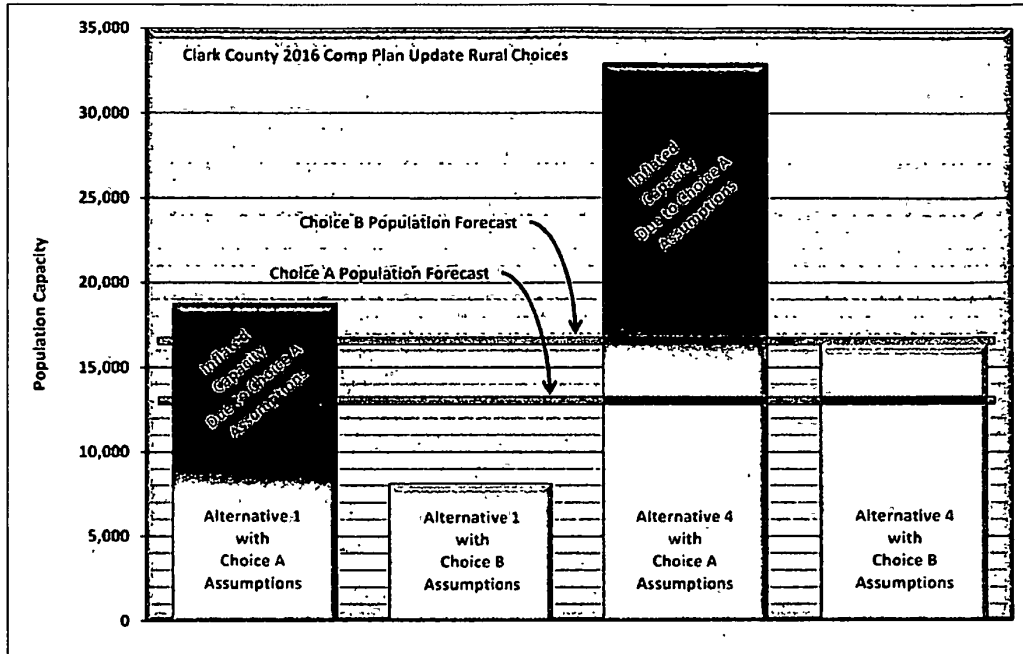
**Table 1: GIS Rural Vacant Buildable Lands Model (VBLM) Assumptions**

Ref	A (existing)	B (proposed)
1	Every possible rural parcel shall be counted as a parcel that will develop regardless of conditions that would likely make such development unlikely	These rural VBLM assumptions should be used not to reflect what is possible, but to reasonably plan for what is likely. Parcels that cannot reasonably be expected to develop should not be counted as parcels likely to develop. Cluster development remainder parcels that are known to be prohibited from further development should not be counted as parcels likely to develop.
2	Rural parcels located in areas far from basic infrastructure with continuous long term commercial forestry operations should be counted as parcels that will develop.	Parcels located in areas far from infrastructure with long term commercial forestry operations likely to continue should not be counted as likely to develop. These assumptions are not used to authorize or to prohibit the development of individual parcels. Rather, these assumptions should only be used for tallying parcel totals for general planning information.
3	Rural parcels including 100% of environmentally constrained areas that lack sufficient area for septic systems and well clearances shall be counted as rural parcels that will develop	Rural parcels that have less than 1 acre of environmentally unconstrained land sufficient area for septic systems and well clearances should not be counted as likely to develop.
4	History shows that about 30% of dividable parcels with homes and 10% of vacant dividable parcels do not develop further. So those deductions have been applied to urban planning totals for years. But every rural parcel shall be counted as a parcel that will divide to the maximum degree possible	History shows that about 30% of dividable parcels with homes and 10% of vacant dividable parcels do not develop further. So those deductions have been applied to urban planning totals for years. These same deductions should be applied to rural planning totals as well.
5	As long as county code allows, lots that are up to 10% smaller than the minimum lot size should be considered as conforming lots and counted as parcels likely to develop.	Same
6	Although county code prohibits most nonconforming parcels from developing, all nonconforming parcels with 1 acre shall be counted as rural parcels that will develop.	Due to some exceptions from the norm, 10% of nonconforming parcels with at least 1 acre of unconstrained area will likely develop.
7	A 15% urban Market Factor provides some margin for the law of supply and demand to comply with the GMA requirement to provide a sufficient supply and achieve the affordable housing goal. But a 0% Market Factor shall be used for rural areas.	A 7.5% rural Market Factor should be used to provide a reasonable margin for the law of supply and demand to comply with the GMA requirement to provide a sufficient supply and achieve the affordable housing goal. Implementation of this rural Market Factor is accomplished by deducting this percentage of parcels from the total available rural parcels. Note that this rural Market Factor is half of the urban Market Factor of 15% in order to also satisfy the GMA goal of reducing low density sprawl.
8	A 27.7% infrastructure deduction for infrastructure including roads, storm water, parks, schools, fire stations, conservation areas, lakes, streams, protected buffers, Etc.. A 0% deduction shall be used for rural areas.	Same

**Table 2: Planning Assumptions**

Ref	A (existing)	B (proposed)
1	The 20 year urban population is forecasted to increase by 116,591.	Same
2	The actual urban/rural split has consistently been 86/14 for decades. But a 90/10 split shall be used instead to lower the rural population growth forecast to only 12,955 persons.	The actual urban/rural split has consistently been 86/14 for decades and is a viable policy option. The 1994 approved plan used 80/20. A more moderate policy of 87.5/12.5 forecasts 16,656 new rural persons for this plan update.
3	The annual county-wide population is forecasted to grow by 129,546 from 448,845 in 2015 to 578,391 in 2035 which calculates to an annual growth rate of 1.28%.	The county-wide population is forecasted to grow by 133,247 from 448,845 in 2015 to 582,092 in 2035. That is a 1.31% annual growth rate. That total is 0.6% higher than choice A. The annual rate is 0.03% higher than choice A.
4	The choice A assumptions assert that Alternative 1 would add 18,814 new persons in the rural area which is 45% more impact than necessary since choice A forecasts a need for 12,955 new persons in the rural area.	The choice B assumptions show that Alternative 1 can fit 8,182 new persons which is 51% too low. Thus Alternative 1 is not a viable option since it cannot comply with the GMA requirement to provide for the forecasted growth. (8,182 / 16,656)
5	The choice A assumptions assert that the original draft Alternative 4 map would add 32,987 new persons which is 155% more impact than necessary since choice A forecasts a need for 12,955 new persons in the rural area.	The choice B assumptions assert that the updated Alternative 4 map can accommodate 16,332 new rural persons. That falls within 2% of the forecasted rural population growth of 16,656 persons. Therefore, Alternative 4 is the appropriate choice.
6	No improvements or mitigations that were identified in the public process should be allowed. Each draft alternative must be accepted or rejected as is. Any revisions would require the process to start over and result in missing the required deadline.	The Alternative 4 updated maps include mitigations that increase the variety of lot sizes including AG-20, preserve large parcels near the UGBs for future employment, and better preserve the rural character. These revisions and planning assumptions should be allowed as proposed.
7	Cluster options are not necessarily included in any Alternative and therefore may not be available to preserve open space or large areas of habitat.	Rural cluster options are to be integrated into Alternative 4 within the limits of the law per previous direction given by the Board for R, AG, and FR zones to provide flexibility, to preserve open space, and to better provide for larger aggregated areas of habitat.
8	The existing Alternative-1 map defines 57% of existing R parcels as nonconforming, 76% of existing AG parcels as nonconforming, and 89% of existing FR parcels as nonconforming. It is not realistic since it does not fit the already developed patterns that actually exist.	The updated Alternative-4 map should be adopted to correct the mismatch between Alternative 1 map and the already developed patterns that actually exist, to respect predominant lots sizes, to resolve some spot zoning problems, and to best accommodate the forecasted population.

**Graph 1: Rural Population Capacity and Forecast**



Note that the existing Comp Plan approved in 2008 planned for a rural population increase that was higher than both choice A and choice B. That 2008 Plan approved for 19,263 new people to be accommodated in the rural area. That plan also approved a higher county-wide population increase to 584,310 persons by the year 2024. – 2004-2024 Comp Plan, chapter 3, page 3-3.

It would be logically fallacious to assert that the proposed choice B with lesser rural population growth and rural impact is somehow not compliant with the GMA after the existing Comp Plan with higher numbers and more impact was approved and found to be GMA compliant.

Assumption choice A counts on developing significant percentages of environmentally constrained land and critical areas. In contrast, choice B better respects the environmentally constrained land and critical areas to better preserve the environment.

**Table 3: The Actual Urban / Rural split for the past 20 years**

Year	County-wide Population	Rural Population	Percent Rural Population	Urban / Rural Split
1995	279,522	43,254	15.5	84/16
1996	293,182	44,882	15.3	85/15
1997	305,287	46,409	15.2	85/15
1998	319,233	48,104	15.1	85/15
1999	330,800	49,429	14.9	85/15
2000	346,435	51,182	14.8	85/15
2001	354,870	52,002	14.7	85/15
2002	369,360	53,548	14.5	85/15
2003	375,394	54,146	14.4	86/14
2004	384,713	54,869	14.3	86/14
2005	395,780	56,009	14.2	86/14
2006	406,124	57,551	14.2	86/14
2007	414,743	58,608	14.1	86/14
2008	419,483	59,042	14.1	86/14
2009	424,406	59,623	14.0	86/14
2010	427,327	59,858	14.0	86/14
2011	432,109	60,544	14.0	86/14
2012	435,048	60,845	14.0	86/14
2013	443,277	61,489	13.9	86/14
2014	446,785	61,948	13.9	86/14

Source: Clark County Assessor GIS records:



The following table documents the actual capacity of the rural area to accommodate the potential population increase for Alternative 1 and Alternative 4 using proposed choice B assumptions compared to the existing choice A assumptions considered in the DSEIS. The revised Alternative 4 map with Choice B assumptions is the proposed Choice B policy.

**Table 4: Rural Capacity to Accommodate Population Growth**

	Alt-1 Capacity per DSEIS Choice A (existing)	Alt-1 Actual Capacity Choice B (proposed)	Alt-4 Capacity per DSEIS Choice A (existing)	Alt-4 Actual Capacity Choice B (proposed)
Rural Zone	5,684	2,570	9,880	4,610
Agriculture Zone	970	286	1,958	733
Forest Zone	419	162	563	1,097
Nonconforming likely		183		74
Other Rural Zones		124		124
Gross potential growth home sites	7,073	3,325	12,401	6,638
7.5% Market Factor deduction	0	-249	0	-498
Net potential growth of home sites	7,073	3,076	12,401	6,140
Potential population growth	18,814	8,182	32,987	16,332

Source: Clark County GIS:

**Correcting the population growth planning assumptions:**

The following table lists the population, growth rates, and urban/rural split options for resolving the differences between the tables in the DSEIS, the adopted resolutions, and planning assumptions. Reference 4 is proposed Choice B policy.

**Table 5: Variations in Population Forecast Documentation**

Ref	Starting population in the year 2015	20-year county-wide population projection	Planned county-wide population growth	Planned urban population growth	Planned rural population growth	Stated annual growth rate	Actual annual growth rate
1	448,845	578,391*	129,546*	116,591	12,955	1.12%*	1.28%
2	447,865	577,431*	129,566*	116,609	12,957	1.25%*	1.29%
3	448,815	577,431*	128,616*	115,754	12,862	1.26%*	1.27%
4	448,845*	582,092	133,247	116,591*	16,656	1.31%	1.31%

\* indicates a directly specified parameter that drives the other parameters.

The calculations for each of the table entries are as follows:

Ref 1: The most recent population growth projection was adopted on April 14, 2015 via resolution# 2015-04-05

<http://clark.wa.gov/thegrid/documents/2015-04-05.pdf>

2015 starting population = 578,391 – 129,546 = 448,845

The Urban/rural population growth split = 90% urban, 10% rural

2035 urban population growth = 129,546 \* 0.9 = 116,591

2035 rural population growth = 129,546 \* 0.1 = 12,955

County-wide annual growth rate = 578,391 / 448,845 = 1.2886208

The 20<sup>th</sup> root of 1.2886208 = 1.012759, annual growth rate = 1.28%

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Ref 2: DSEIS table S-1 on page S-2

<http://clark.wa.gov/cgrid/images/DSEISTableS-1.JPG>

2015 starting population = 577,431 – 129,566 = 447,865

The Urban/rural population growth split = 90% urban, 10% rural

2035 urban population growth = 129,566 \* 0.9 = 116,609

2035 rural population growth = 129,566 \* 0.1 = 12,957

County-wide annual growth rate = 577,431 / 447,865 = 1.289297

The 20<sup>th</sup> root of 1.289297 = 1.012859, annual growth rate = 1.29%

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Ref 3: DSEIS table 1-1 on page 1-2

<http://clark.wa.gov/cgrid/images/DSEISTable1-1.JPG>

2015 starting population = 577,431 – 128,616 = 448,815

The Urban/rural population growth split = 90% urban, 10% rural

2035 urban population growth = 128,616 \* 0.9 = 115,754

2035 rural population growth = 128,616 \* 0.1 = 12,862

County-wide annual growth rate = 577,431 / 448,815 = 1.286568

The 20<sup>th</sup> root of 1.286568 = 1.0126786, annual growth rate = 1.27%

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Ref 4: Corrected starting population and urban population growth to original resolution# 2015-04-05 with 87.5/12.5 urban/rural split.

For 87.5/12.5 urban/rural population growth split, the numbers are as follows:

2035 urban population growth = 116,591 (from resolution# 2015-04-05).

Keeping the same urban growth, the rural population growth is calculated as follows, where X = the rural population growth:

$X = 116,591 * .125 / .875 = 16,656$

County-wide population growth = 116,591 + 16,656 = 133,247

County-wide 2035 population = 448,845 + 133,247 = 582,092

County-wide annual growth rate = 582,092 / 448,845 = 1.2968664

The 20<sup>th</sup> root of 1.2968664 = 1.01308238, annual growth rate = 1.31%

**Exhibit B**

**Rural Comparison of the 2004-2024 and the Proposed 2016-2035 Comp Plan Update**

Comp Plan changes should be based on compelling reasons and be understood in the context of already approved plans that have proven to be GMA compliant. The following documentation explains the compelling need to address the chronic problems that have plagued the rural community for more than 2 decades.

The Comp Plan that was first adopted in 1994 created a gross mismatch between the actual ground-truth of already developed rural patterns and an unrealistic zoning map. Subsequent Comp Plan updates have failed to address the chronic mismatch problems.

The unrealistic zoning map persists to this day and would continue to persist if Alternative 1 was selected for this Comp Plan Update. The current rural zoning map is not appropriate as demonstrated by the gross mismatch between the existing zoning map and the existing R, AG, and FR zones of the rural community. That zoning map creates the following problems:

**Table 1 – Mismatch between the existing rural zoning map and the real world**

<b>Rural zone</b>	<b>Proportion defined as non-conforming</b>
<b>R Zoned Parcels</b>	<b>6 out of 10</b>
<b>AG Zoned Parcels</b>	<b>8 out of 10</b>
<b>FR Zoned Parcels</b>	<b>9 out of 10</b>

This mismatch is not a result of the rural community creating nonconforming parcels. Rather the mismatch was created by an incompatible zoning map that was created in 1994 that made the vast majority of rural parcels nonconforming. That mismatch continues to harm the rural community by increasing the cost and complexity of permits for most rural citizens.

Further, such wide-spread negative impacts have restricted the reasonable improvements that would otherwise be appropriate for existing homes in the rural community. The needless extra cost and complexity of permits impacting the majority of rural citizens, not only disregards the specific goals of listed in the GMA, but the negative impacts hamper the fulfillment of those goals.

**Table 2 – Fulfilling the goals of the GMA:**

<b>GMA Goal</b>	<b>Alternative 1</b>	<b>Alternative 4</b>
<b>Affordable Housing</b>	<b>Higher cost</b>	<b>Lower cost</b>
<b>Economic Development</b>	<b>Disadvantaged</b>	<b>Supported</b>
<b>Variety of rural densities</b>	<b>6 total</b> R: 5, 10, 20 AG:20 FR: 40, 80	<b>10 total</b> R: 1, 2.5, 5 AG: 5, 10, 20 FR: 10, 20, 40, 80
<b>Property Rights</b>	<b>Diminished</b>	<b>Respected</b>
<b>Permits</b>	<b>Costly, burdensome, overly constrained</b>	<b>More affordable; straight forward, simpler, more flexible</b>

**Table 3 – Population Growth and Proposed Densities**

<b>Ref</b>	<b>2004-2024 Plan as approved in 2007</b>	<b>Proposed 2016-2035 Plan</b>	<b>Difference</b>
Forecasted Rural Population Growth	<b>19,264</b>	<b>16,656</b>	<b>13.6% less</b>
Rural Population Capacity	<b>19,132</b>	<b>16,332</b>	<b>14.7% less</b>
Forecasted Rural Parcel Growth	<b>7,438</b>	<b>6,262</b>	<b>15.8% less</b>
Forecasted Rural Parcel Growth	<b>7,387</b>	<b>6,140</b>	<b>16.9% less</b>
Planned County-wide Population Density (persons / Sq Miles)	<b>889</b> (584,310 / 656.6)	<b>887</b> (582,092 / 656.6)	<b>same</b>
Planned Urban Population Density (persons / Sq Miles)	<b>3184</b> ((328,123 + 173,371) / 157.5)	<b>3224</b> ((386,640 + 116,591) / 156.1)	<b>1.26% more</b>
Planned Rural Population Density (persons / Sq Miles)	<b>166</b> ((63,552 + 19,264) / 499.1)	<b>158</b> ((62,205 + 16,656) / 500.5)	<b>4.8% less</b>

Exhibit B



The above calculations for population densities are based on the following data:

**Table 4 – Population Growth and Proposed Densities**

Square Miles	2004-2024 Base Year	2016-2035 Base Year
County-wide	656.6	656.6
Urban (cities + UGAs)	157.5	156.1
Rural	499.1 (500.6 – 157.5)	500.5 (656.6 – 156.1)

**Show your work:**

The following math show how the forecasted population numbers were calculated with GIS data.

Per the 2007 plan for the target 2024:

County-wide population:  $391,675 + 192,635 = 584,310$

Urban Population:  $328,123 + 173,371 = 501,494$

Rural population:  $63,552 + 19,264 = 82,816$

Per the proposed plan for the target 2035:

County-wide population:  $448,845 + 133,247 = 582,092$

Urban Population:  $386,640 + 116,591 = 503,231$

Rural population:  $62,205 + 16,656 = 78,861$

**What the proposed rural plan does:**

The proposal provides a more realistic and sensible plan that is consistent with the ground truth of already developed parcels and rural conditions. In contrast to unlikely scenarios that may be theoretically possible, but unlikely to unfold, the proposal corrects unrealistic assumptions to better align with realistic expectations.

Rather than proliferating smaller rural parcels, the proposed plan recognizes predominant patterns that already exist.

**What the proposed rural plan does not do:**

The proposed rural plan does not de-designate any resource land.

The proposal does not increase rural density compared to the existing plan approved in 2007. Rather, the above facts show, the proposal is for a lower rural density than the existing 2007 plan that was approved as GMA compliant.

The proposal does not propose a higher rural population or more rural lots than the existing plan approved in 2007. Rather, the above facts show that the proposal forecasts a lesser rural population growth and accommodates fewer new persons than the existing 2007 plan that was approved as GMA compliant.

**Conclusion:**

Some have argued that we cannot afford the time to correct the known problems and suggest that perhaps in 8 to 20 years, we can conduct in-depth studies to get it right. Some shrink back from the responsibility for fear of lawsuits and prefer to kick the can down the road because it would be easier.

The GMA does not excuse counties from doing their due diligence or from fulfilling their responsibilities to complete the required task of submitting the most realistic and best plan for their community.

Every effort has been made to meet or exceed all appropriate processes. That investment should not be abandoned because it is too hard or too risky. In contrast, we can now select a concise and optimized plan and complete the task in the allotted time. Our community's future is worth the effort.