

Public Comment

SEPA Scoping

7/29/14 – 9/1/14

McCall, Marilee



CP16#0192

From: Redline, Tina
Sent: Tuesday, July 29, 2014 3:14 PM
To: Orjiako, Oliver
Cc: McCall, Marilee
Subject: FW: Comprehensive Plan Update - Infrastructure Percent Deduction
Attachments: Infrastructure Percentage Deduction Memo to BOCC 20140729.pdf

*Tina Redline, Office Supervisor
Board of Commissioners Office
P.O. Box 5000
Vancouver WA 98666-5000
(360) 397-2232*

From: Clark, Jennifer (BOCC)
Sent: Tuesday, July 29, 2014 3:12 PM
To: Tilton, Rebecca; Redline, Tina; LaRocque, Linnea
Subject: FW: Comprehensive Plan Update - Infrastructure Percent Deduction

FYI

From: Mike Odren [<mailto:mikeo@olsonengr.com>]
Sent: Tuesday, July 29, 2014 2:38 PM
To: Mielke, Tom; Madore, David; Barnes, Ed
Cc: James Howsley; Eric Golemo; Mike Odren; Clark, Jennifer (BOCC)
Subject: Comprehensive Plan Update - Infrastructure Percent Deduction

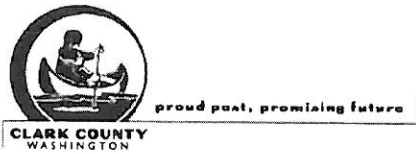
Commissioners Mielke, Madore and Barnes,

On behalf of the Development and Engineering Advisory Board (DEAB), please find attached documentation concerning the County's assumed infrastructure deduction percentage rate for residential, commercial and industrially zoned lands. The documentation attached shows that the percentages currently listed in the comprehensive plan appear to be too low based on case studies and reviews of actual development under the current stormwater code. It is the collective hope of DEAB that the commissioners seriously consider the information provided and adjust the infrastructure percentage for the upcoming Comprehensive Plan Update. I will also submit hard copies of this attachment directly to the Board's office this afternoon. Should you have any questions about the information contained herein, please contact Eric Golemo or James Howsley.

Respectfully,

Michael Odren, R.L.A.
Chair, Development and Engineering Advisory Board
Landscape Architect, Land Use Planner
Associate Principal
Olson Engineering, Inc.
1111 Broadway
Vancouver, WA 98660

360-695-1385 WA
503-289-9936 OR
360-695-8117 FAX
mikeo@olsonengr.com
www.olsonengr.com



DEVELOPMENT and ENGINEERING ADVISORY BOARD

July 29, 2014

Clark County Board of Commissioners
Attn: Jennifer Clark
P.O. Box 5000
Vancouver, WA 98666-5000

Re: Comprehensive Plan Update - Infrastructure Percent Deduction

To the Board of County Commissioners,

The Development and Engineering Advisory Board (DEAB) has reviewed documents and proposals regarding the current Comprehensive Plan Update. Members of the board have expressed concern regarding the assumed infrastructure deduction percentage being used to develop the plan. The commissioners asked DEAB to provide some info and input regarding the infrastructure deduction percentage. This letter is in response to that request.

Currently the assumed infrastructure deduction percentage rate is 27.7% for residential and 25% for Commercial and Industrial. This rate has not changed with updated stormwater ordinances. While these assumptions may be appropriate in areas of well draining soils, we believe they underestimate the impact in areas of poorly draining soils which is where most of the undeveloped portion of the urban growth area is located. DEAB has conducted some research with the help of other local engineering consultants. We have attached some sample infrastructure percent calculations in soils with fairly low infiltration rates similar to the areas at the fringe of the urban growth boundary. First we looked at a few theoretical examples prepared by SGA Engineering or the county during the previous stormwater code update. On some, it was assumed LID was feasible, but in low rate soils this may not be the case, or utilizing LID may only compensate for the new LID flow standard.

With DOE forested standard with low infiltration the infrastructure % on these three example projects are: **39%, 51%, and 32%**.

Next we obtained a few calculations on sample projects from several local consultants. These examples do not account for the new LID flow standard. It is assumed this will add cost but not likely take additional area.

Sterling Design provided a calculation for Whispering Pines subdivision. Under the old stormwater rules the infrastructure is 31% with the current adopted rules it goes to **34.5%**.

Olson Engineering provided 4 examples in the Battleground area. No exhibits are attached but could be provided upon request.

The summary is below:

18 Lot subdivision - **42%**

167 lot Subdivision - **25%**

117 Lot Subdivision - **32%**

26.3Ac Commercial - **34%**

In conclusion DEAB feels the 27.7% is low and doesn't accurately reflect the percentage of land lost to infrastructure. The average infrastructure percentage in the 8 examples we looked at was about **36.2%**. It should be noted that not all land brought into the urban growth boundary is in poorly drained soil. **But based on a weighted average 32-35% is likely a more accurate range for the assumed Infrastructure Percent Deduction.**

Please let us know if you have any questions.

Respectfully,



Michael Odren, R.L.A.

Chair, Development and Engineering Advisory Board



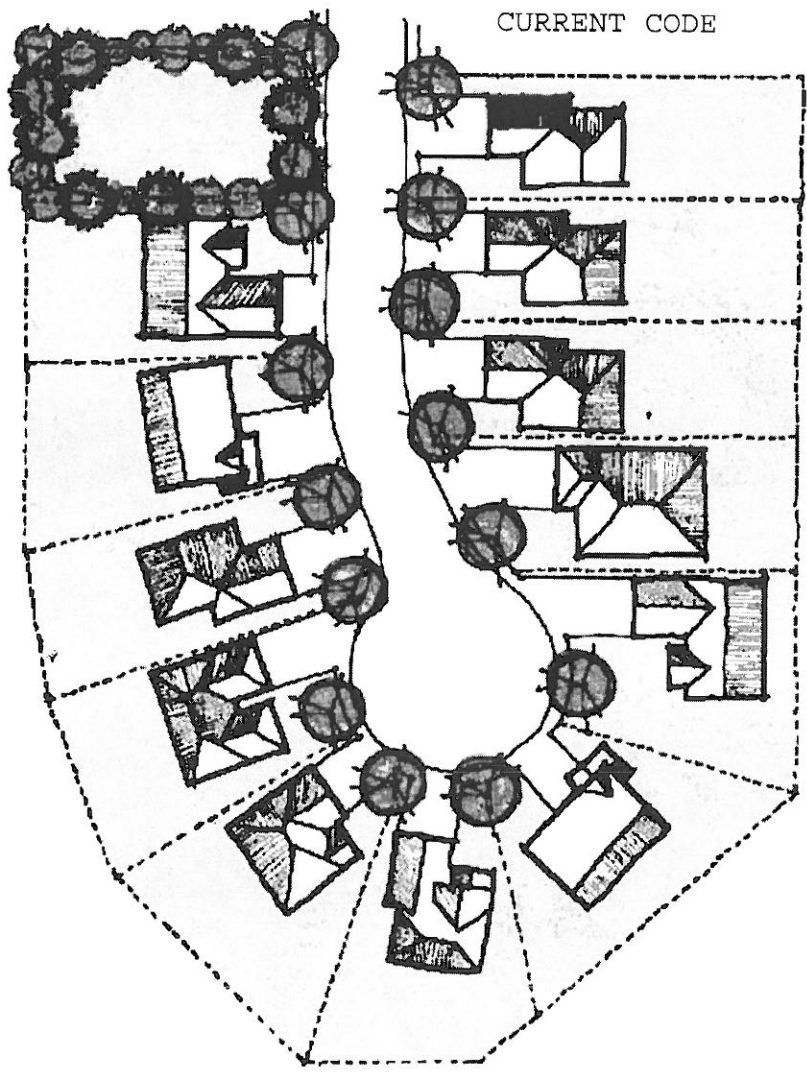
Eric E. Golemo, PE

Sub-Committee Chair, Development and Engineering Advisory Board

Attachments and Supporting Information:

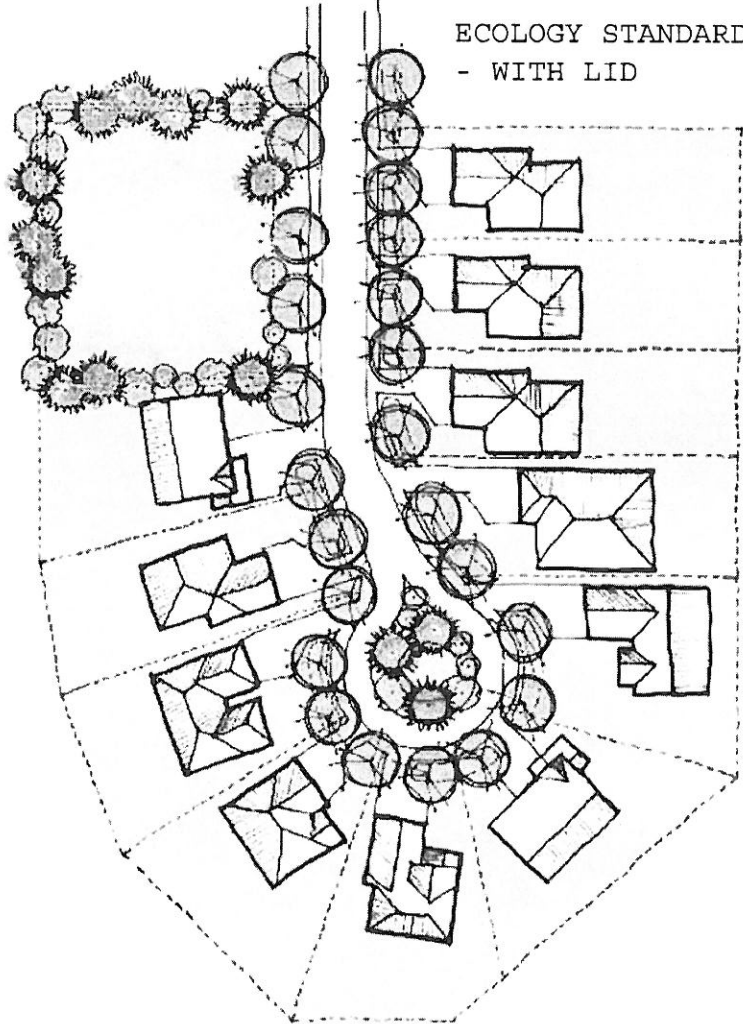
- 1) Site use per code Table Projects 1-3
- 2) Project 1 - Figure
- 3) Project 2 - Figure
- 4) Project 3 - Figure
- 5) Email from Peter Tuck of Olson Engineering (7-2-2014) - Project examples
- 6) Email from Joel Stirling of Sterling Design (7-10-2014) - Project example

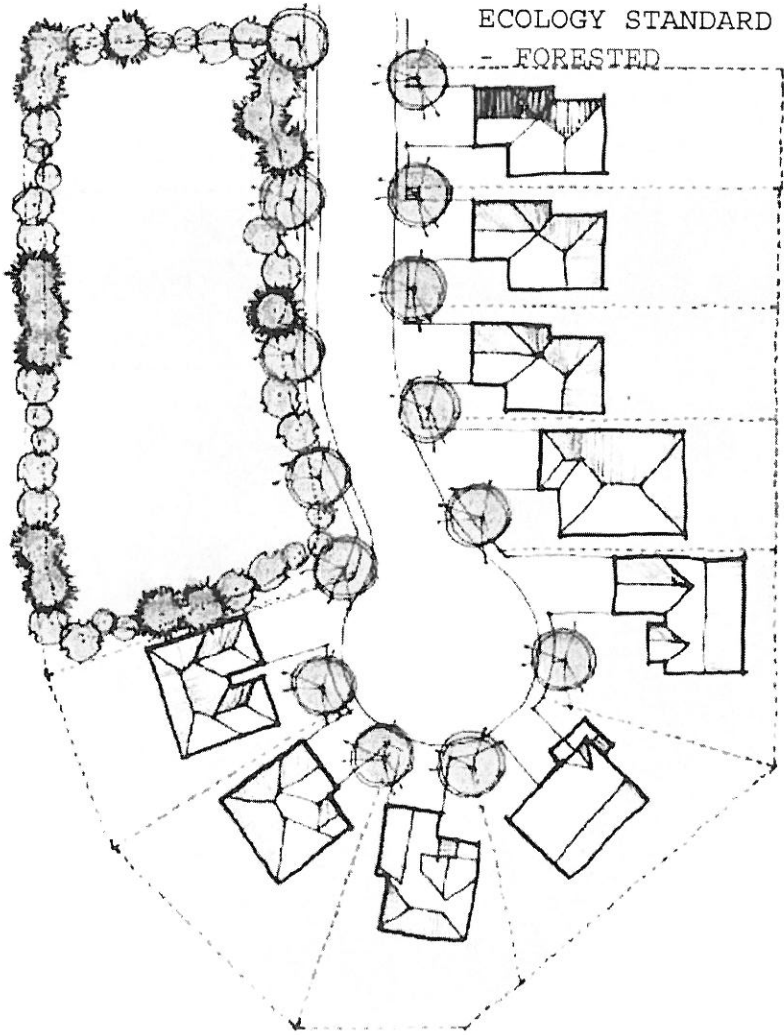
PROJECT	APPLICABLE CODE	LOTS	STORM	INFRASTRUCTURE	TOTAL
1	CURRENT CODE	12	6%	14%	20%
	ECOLOGY STANDARD WITH LID	11	14%	11%	25%
	ECOLOGY STANDARD - FORESTED	9	25%	14%	39%
2	CURRENT CODE	55	5%	26%	31%
	PROPOSED ORDINANCE - PASTURE	51	12%	24%	36%
	PROPOSED ORDINANCE - FORESTED	39	29%	22%	51%
3	COMMERCIAL - CURRENT CODE	-	12%	4%	16%
	COMMERCIAL - PROPOSED ORDINANCE	-	28%	4%	32%



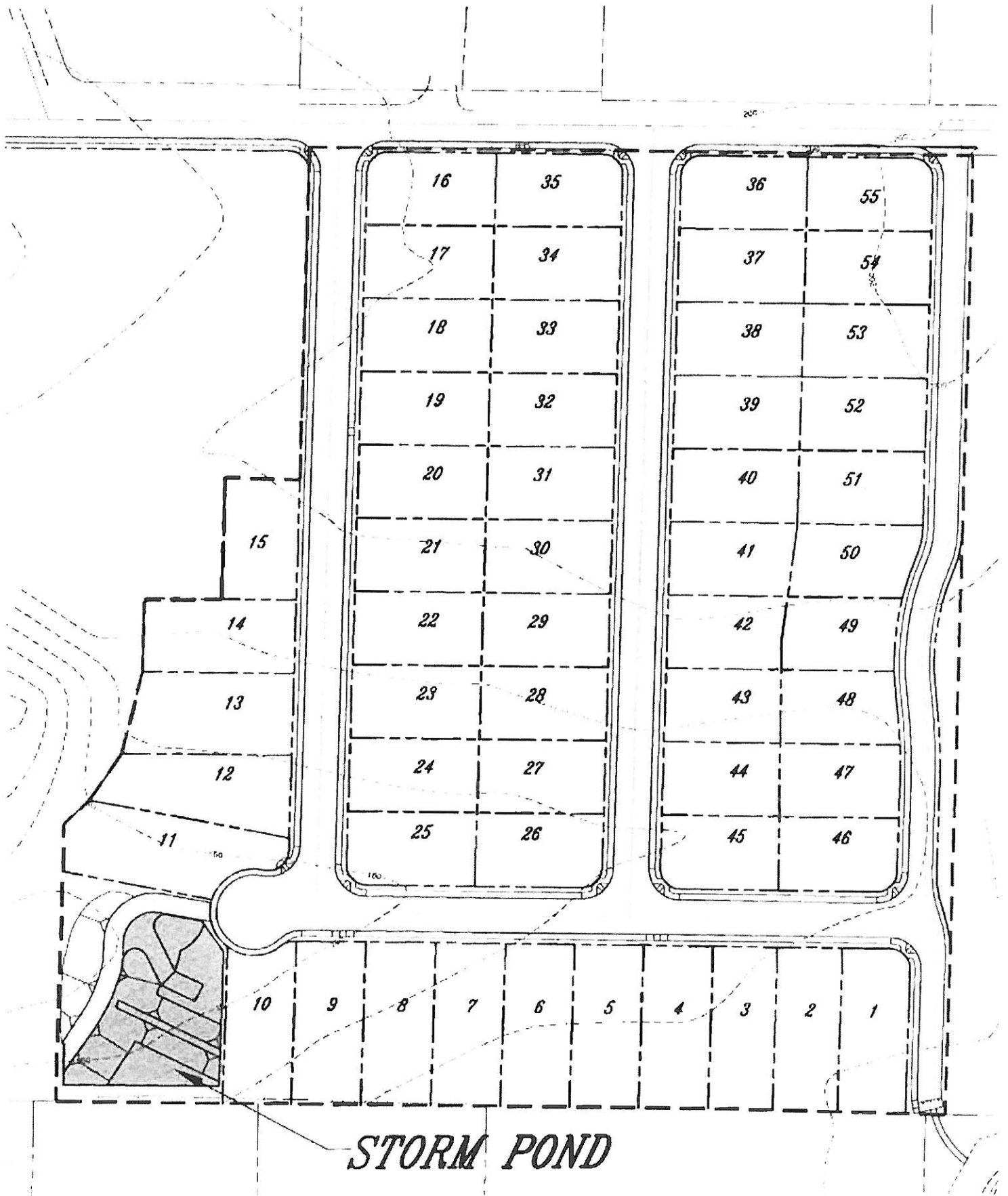
CURRENT CODE

ECOLOGY STANDARD
- WITH LID

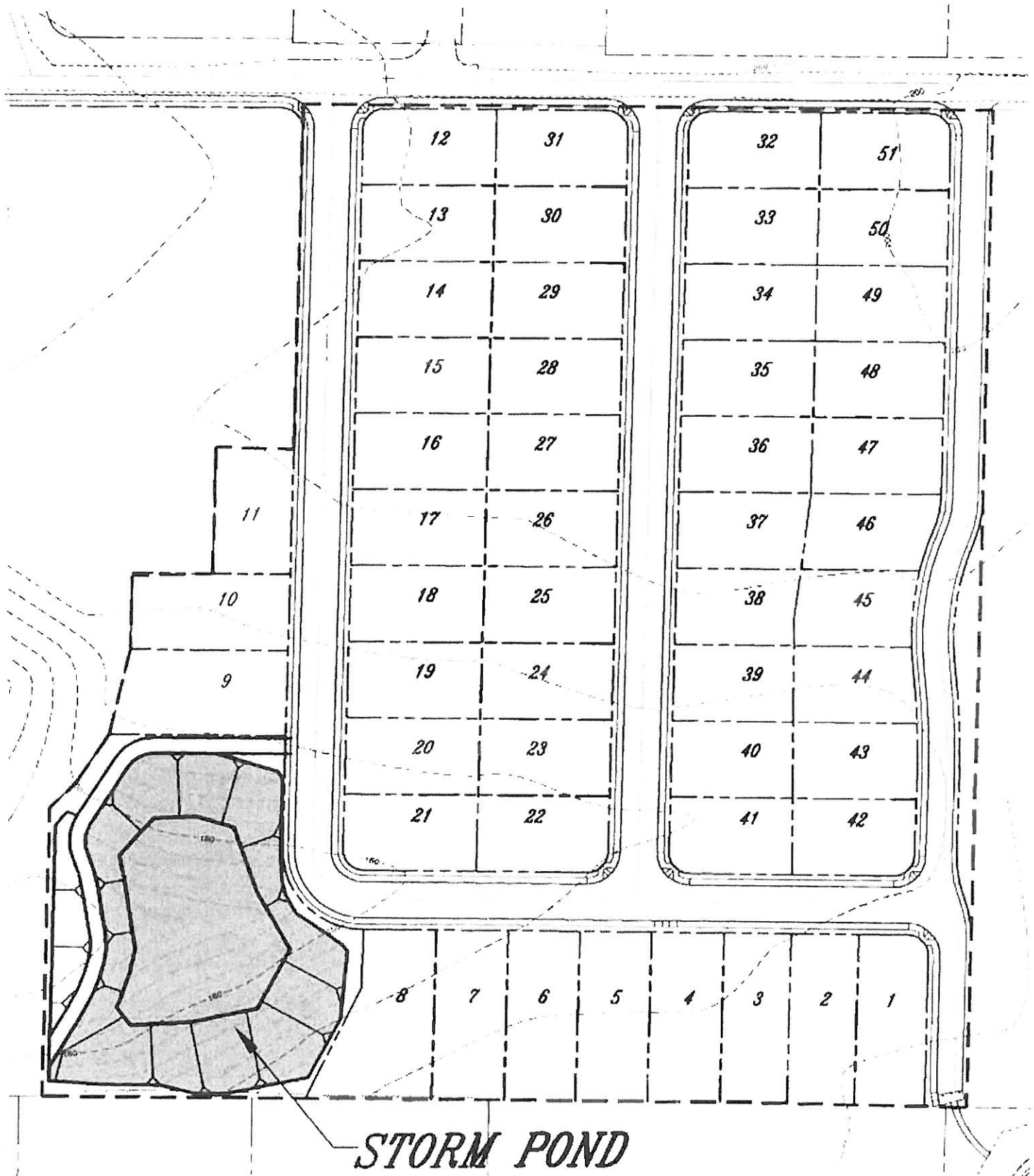




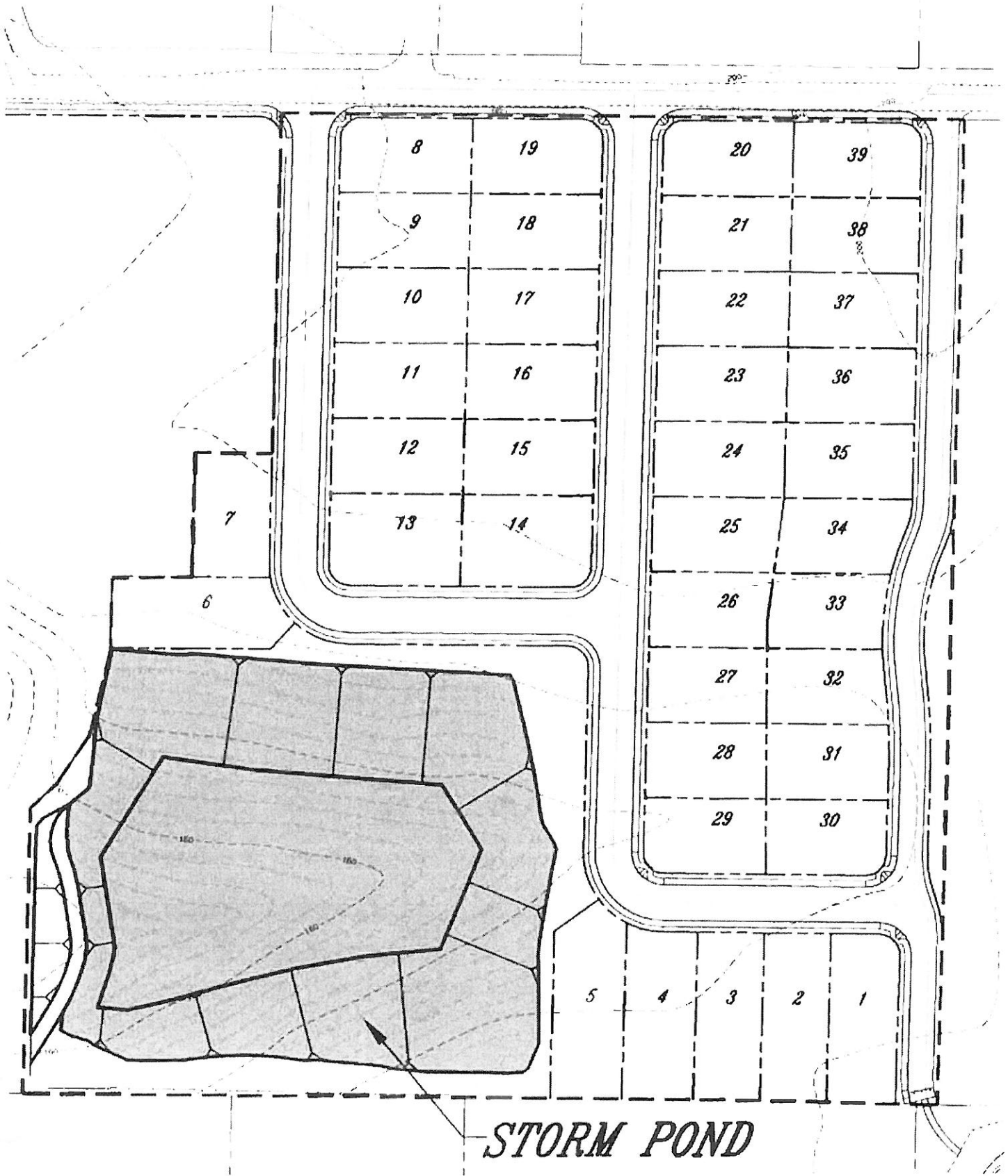
POND UNDER CURRENT STORM URDINANCE



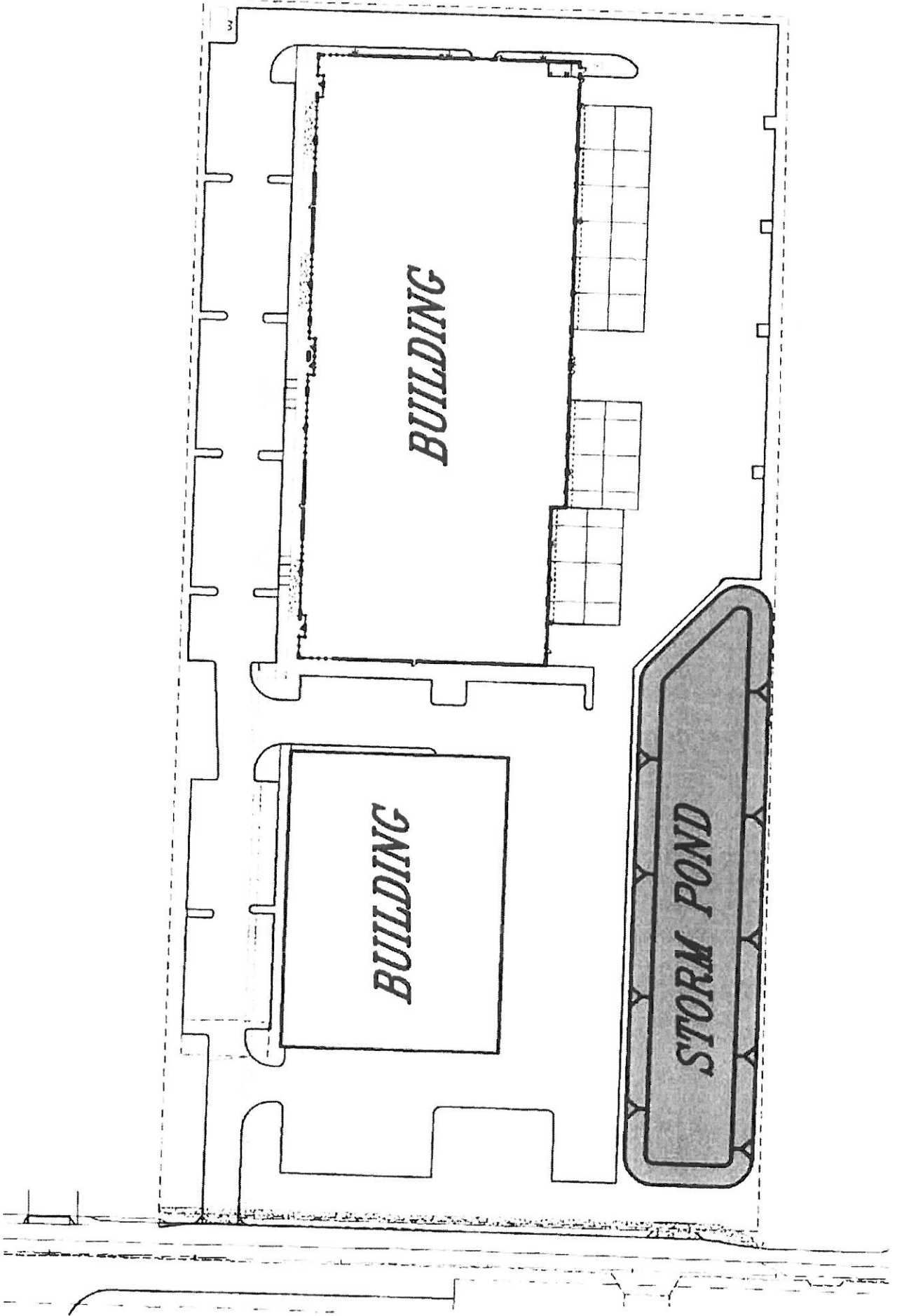
POND UNDER PROPOSED STORM ORDINANCE (PREDEVELOPED PASTURE CONDITION)



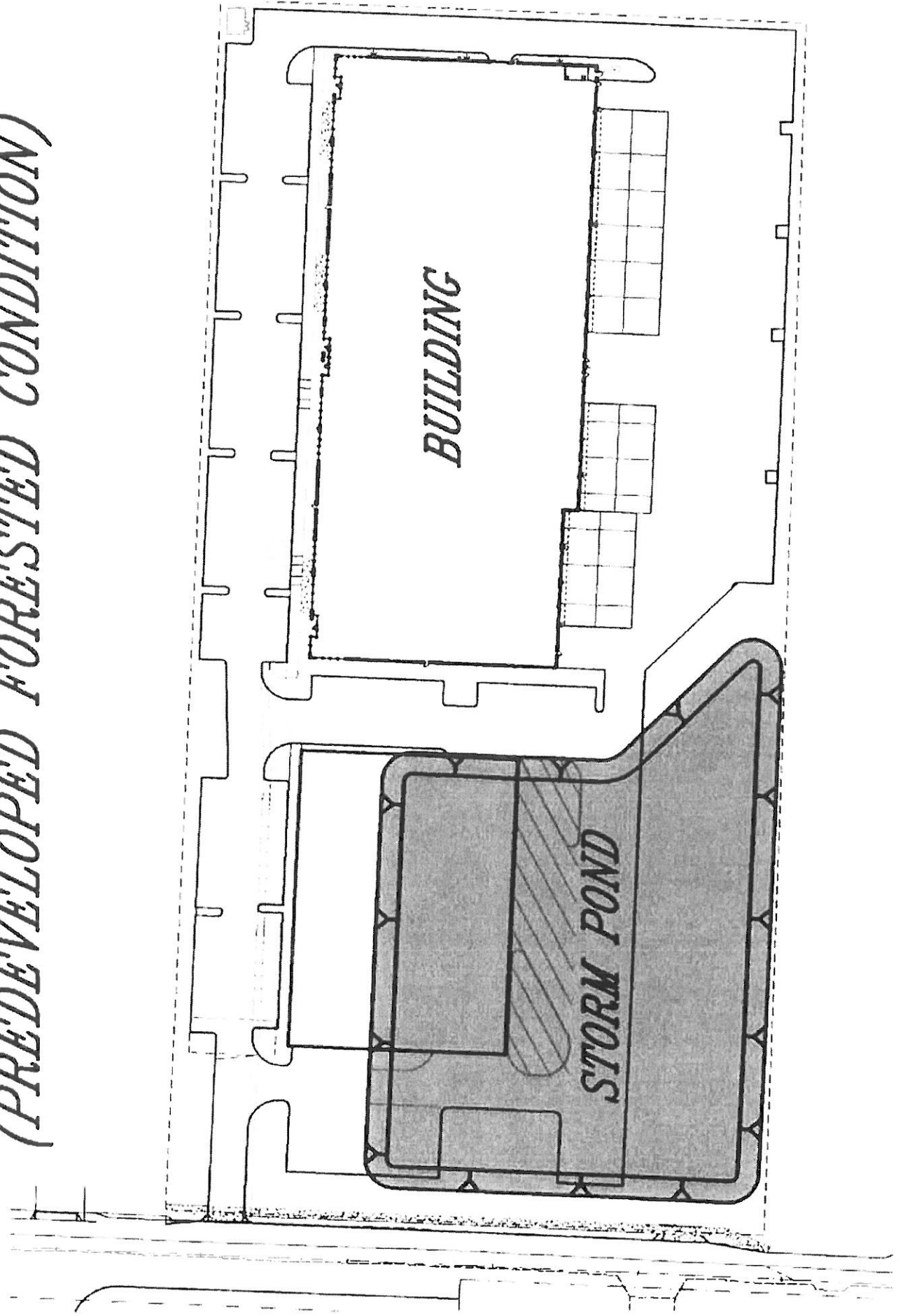
*POND UNDER PROPOSED STORM URDINANCE
(PREDEVELOPED FORESTED CONDITION)*



POND UNDER CURRENT STORM ORDINANCE



*POND UNDER PROPOSED STORM ORDINANCE
(PREDEVELOPED FORESTED CONDITION)*



Mike Odren

From: Peter Tuck [peter@olsonengr.com]
Sent: Wednesday, July 02, 2014 1:54 PM
To: Jamie Howsley; Eric Golemo
Cc: Mike Odren
Subject: RE: Comp Plan update infrastructure deduction

Jamie/Eric,

Regarding the area of a project impacted by road ROW and stormwater facilities in the Battle Ground area, I have the following:

18 Lot subdivision - 42%

167 lot Subdivision - 25%

117 Lot Subdivision - 32%

26.3Ac Commercial - 28% with no frontage since City did that project. If that area was included %age would increase to approximately 34%

These calculations take the developable area only and do not include wetland areas that are not impacted.

Let me know if you have any questions.

Peter.

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

From: Jamie Howsley [mailto:jamie.howsley@jordanramis.com]
Sent: Tuesday, July 01, 2014 3:38 PM
To: Eric Golemo; Peter Tuck
Cc: Mike Odren
Subject: RE: Comp Plan update infrastructure deduction

Holsinger is giving me something tomorrow. He thinks 40%

Please excuse spelling mistakes as is sent with Good via my iPhone (www.good.com)

CONFIDENTIALITY NOTICE: Please do not read, copy, or disseminate this communication unless you are the intended addressee. This e-mail may contain confidential and/or privileged information intended only for the addressee. If you have received this in error, please notify me via return e-mail.

TAX ADVICE NOTICE: IRS Circular 230 requires us to advise you that if this communication or any attachment contains any tax advice, the advice is not intended to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties or (ii) promoting, marketing, or recommending any transaction, plan, or arrangement. A taxpayer may rely on professional advice to avoid tax-related penalties only if the advice is reflected in a comprehensive tax opinion that conforms to stringent requirements. Please contact us if you

have any questions about this requirement, or would like to discuss preparation of an opinion that conforms to these IRS rules.

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Tuesday, July 01, 2014 03:34 PM Pacific Standard Time
To: Peter Tuck
Cc: Mike Odren; Jamie Howsley
Subject: RE: Comp Plan update infrastructure deduction

Were you able to come up with anything? I would like to respond to the Commissioners this week. Our office is working on some info. But, we don't have a lot going on in Battleground right now under the new code. Do you have any examples you could contribute.

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Thursday, June 26, 2014 4:05 PM
To: Peter Tuck (peter@olsonengr.com)
Cc: Mike Odren (mikeo@olsonengr.com); James Howsley (Jamie.howsley@jordanramis.com)
Subject: Comp Plan update infrastructure deduction

Peter,

Jamie and I attended the hearing on the comp plan. One of the items we are working on is the infrastructure deduction. It is currently set at 27%.

This hasn't changed with the Stormwater code. We have argued that the 27% is likely adequate where you have good to moderately draining soils but not in poorly drained soils. The commissioners asked for some supporting documentation. Our office is working on some info. But, we don't have a lot going on in Battleground right now under the new code. Do you have any examples you could contribute.

Thanks,

Eric

Eric E. Golemo, PE
Owner / Director of Engineering and Planning

SGA Engineering, PLLC

Civil Engineering / Land Use Planning

Development Services / Landscape Architecture
2005 Broadway, Vancouver WA 98663
Phone: (360)993-0911
Fax: (360)993-0912

Mbl: (360)903-1056
Email: EGolemo@sgaengineering.com

Mike Odren

From: Joel Stirling [joel@sterling-design.biz]
Sent: Thursday, July 10, 2014 1:16 PM
To: 'Eric Golemo'
Cc: 'James Howsley'
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

The stormwater management facilities would increase from 9% of the project up to 12.5% project under that scenario. Total infrastructure would go from 34% up to 37.5% if the park dedication is included or from 31% up to 34.5% without the park.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983
Mbl.(360) 600-5666

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Thursday, July 10, 2014 1:03 PM
To: 'Joel Stirling'
Cc: James Howsley
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Do you have an updated infrastructure percentage I can plug in?
Thanks,
Eric

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

From: Joel Stirling [mailto:joel@sterling-design.biz]
Sent: Thursday, July 10, 2014 12:56 PM
To: 'Eric Golemo'
Cc: 'Joel Rutherford'
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Good Afternoon Eric,

Based on the model run that I put together in the WWHM2012 program, utilizing the Auto Pond feature, the pond size went from 1.07 acres up to 2.19 acres which is roughly double the size (2.05 times larger). It is my experience that the Auto Pond feature is very conservative and the pond likely can be optimized further but even with the optimization it appears that there is a significant increase in required detention storage between the old and the new stormwater requirements for the Whispering Pines Subdivision. Let me know if there is anything else I can assist you with.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983

Mbl.(360) 600-5666

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Thursday, July 10, 2014 10:37 AM
To: 'Joel Stirling'
Cc: Joel Rutherford
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Joel,
Were you able to get an estimate under the new code?
Thanks,
Eric

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Wednesday, July 02, 2014 3:50 PM
To: 'Joel Stirling'
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Thanks.

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

From: Joel Stirling [mailto:joel@sterling-design.biz]
Sent: Wednesday, July 02, 2014 3:46 PM
To: 'Eric Golemo'; 'Jamie Howsley'; peter@olsonengr.com
Cc: mikeo@olsonengr.com
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

I am stuck in meetings for the rest of the afternoon today but will see if I or one of my staff can set up a model run in WWHM12 in the morning for comparison. As you all are aware, the requirement to utilize "old growth forest" as the pre-developed site condition is likely what will have the biggest impact on the size of the pond. I will keep you posted.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983
Mbl.(360) 600-5666

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Wednesday, July 02, 2014 3:40 PM
To: 'Jamie Howsley'; peter@olsonengr.com
Cc: mikeo@olsonengr.com; Joel Stirling
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Do we have a calculation for the new code?
Joel, have you looked at this?

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

From: Jamie Howsley [mailto:jamie.howsley@jordanramis.com]
Sent: Wednesday, July 02, 2014 2:54 PM

To: Eric Golemo; peter@olsonengr.com
Cc: mikeo@olsonengr.com; Jamie Howsley
Subject: Whispering Pines Infrastructure Deduction-Battle Ground

Eric and Peter,

Attached is the infrastructure deduction for Holsinger's Whispering Pines subdivision. It is approved however under the old stormwater rules. I am being told that the stormwater would likely double if under the new rules.
As you can see with the park it is 34% without 31%.

Best,

Jamie

JAMES D. HOWSLEY | Attorney
Jordan Ramis PC | Attorneys at Law | Celebrating 50 years WA Direct:
360-567-3913
OR Direct: 503-598-5592
OR Main: 503-598-7070

CONFIDENTIALITY NOTICE: Please do not read, copy, or disseminate this communication unless you are the intended addressee. This e-mail may contain confidential and/or privileged information intended only for the addressee. If you have received this in error, please notify me via return e-mail.

TAX ADVICE NOTICE: IRS Circular 230 requires us to advise you that if this communication or any attachment contains any tax advice, the advice is not intended to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties or (ii) promoting, marketing, or recommending any transaction, plan, or arrangement. A taxpayer may rely on professional advice to avoid tax-related penalties only if the advice is reflected in a comprehensive tax opinion that conforms to stringent requirements. Please contact us if you have any questions about this requirement, or would like to discuss preparation of an opinion that conforms to these IRS rules.

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

From: MPC6000-VAN@jordanramis.com [mailto:MPC6000-VAN@jordanramis.com]
Sent: Wednesday, July 02, 2014 2:51 PM
To: Jamie Howsley
Subject:

This E-mail was sent from "MPC6000-VAN" (Aficio MP C6000).

Scan Date: 07.02.2014 14:50:45 (-0700)
Queries to: MPC6000-VAN@jordanramis.com

O'Donnell, Mary Beth



CP16#0199

From: Eric Eisemann <e.eisemann@e2landuse.com>
Sent: Tuesday, July 29, 2014 10:57 AM
To: Euler, Gordon; McCauley, Mark; Orjiako, Oliver; steve.stuart@ci.ridgefield.wa.us
Cc: 'Elizabeth Decker'
Subject: Tri-Mountain Golf Course
Attachments: Tri Mountain Parcel # v2.pdf

Gordy,

I appreciate the time you, Mark McCauley, and Oliver Orjiako took yesterday to meet with Steve Stuart and me.

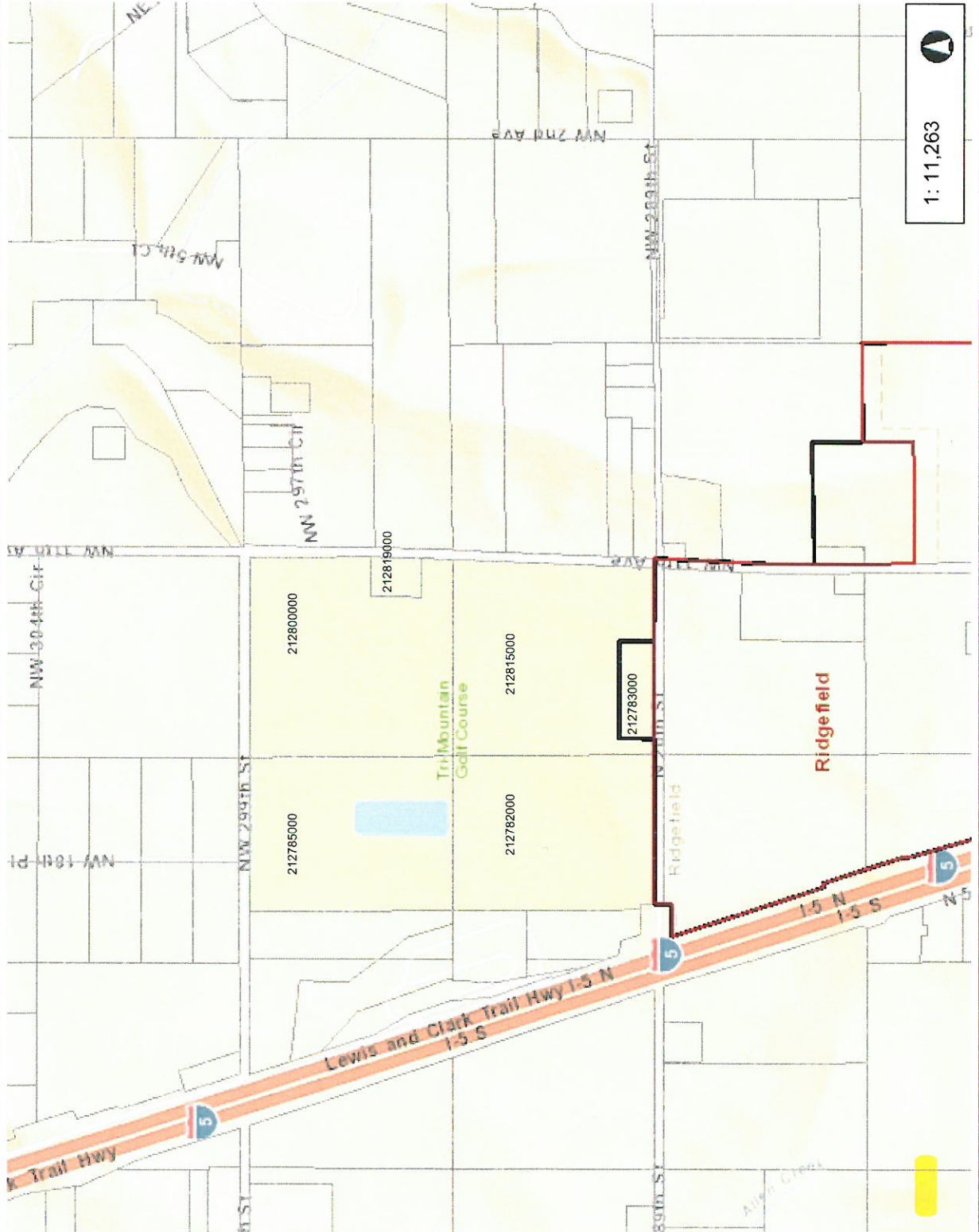
During the meeting we discussed the possibility of Clark County moving the Tri-Mountain Golf Course and an abutting property into the Ridgefield Urban Growth Area. The properties in question, depicted on the attached map, would remain under County Park/Open Space designation and future County Park/Open Space zoning. Clark County will continue to operate and maintain Tri-Mountain Golf Course. Consequently, the proposed expansion would not alter the City's population and employment forecasts. The UGA expansion would not alter the current provision of capital facilities and services and inclusion of the Tri-Mountain properties into the City's UGA would allow Ridgefield to provide urban services more efficiently in the future. In addition, we understand that the County's proposal to include the Tri-Mountain Golf Course in the Ridgefield UGA could benefit Clark County's management and financing of the golf course.

Consequently, the City of Ridgefield supports Clark County's proposal to add the Tri-Mountain complex into the Ridgefield UGA for Park/Open Space purposes.

Thank you,
Eric Eisemann
Ridgefield Senior Planning Consultant

Eric Eisemann
E2 Land Use Planning, LLC
215 W. 4th Street, Suite # 201
Vancouver, WA 98660
360.750.0038
e.eisemann@e2landuse.com

Tri Mountain Parcel



Legend

- Cities Boundaries
- Urban Growth Area Boundary
- Building Footprints
- Taxlots
- World Street Map

Notes:

1: 11,263



This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.

WGS 1984 Web Mercator Auxiliary Sphere
Clark County, WA. GIS - <http://gis.clark.wa.gov>



proud past, promising future



CP16#0196

DEVELOPMENT and ENGINEERING ADVISORY BOARD

July 29, 2014

Clark County Board of Commissioners
Attn: Jennifer Clark
P.O. Box 5000
Vancouver, WA 98666-5000

Re: Comprehensive Plan Update - Infrastructure Percent Deduction

To the Board of County Commissioners,

The Development and Engineering Advisory Board (DEAB) has reviewed documents and proposals regarding the current Comprehensive Plan Update. Members of the board have expressed concern regarding the assumed infrastructure deduction percentage being used to develop the plan. The commissioners asked DEAB to provide some info and input regarding the infrastructure deduction percentage. This letter is in response to that request.

Currently the assumed infrastructure deduction percentage rate is 27.7% for residential and 25% for Commercial and Industrial. This rate has not changed with updated stormwater ordinances. While these assumptions may be appropriate in areas of well draining soils, we believe they underestimate the impact in areas of poorly draining soils which is where most of the undeveloped portion of the urban growth area is located. DEAB has conducted some research with the help of other local engineering consultants. We have attached some sample infrastructure percent calculations in soils with fairly low infiltration rates similar to the areas at the fringe of the urban growth boundary. First we looked at a few theoretical examples prepared by SGA Engineering or the county during the previous stormwater code update. On some, it was assumed LID was feasible, but in low rate soils this may not be the case, or utilizing LID may only compensate for the new LID flow standard.

With DOE forested standard with low infiltration the infrastructure % on these three example projects are: 39%, 51%, and 32%.

Next we obtained a few calculations on sample projects from several local consultants. These examples do not account for the new LID flow standard. It is assumed this will add cost but not likely take additional area.

Sterling Design provided a calculation for Whispering Pines subdivision. Under the old stormwater rules the infrastructure is 31% with the current adopted rules it goes to 34.5%.

Olson Engineering provided 4 examples in the Battleground area. No exhibits are attached but could be provided upon request.

The summary is below:

18 Lot subdivision - 42%

167 lot Subdivision - 25%

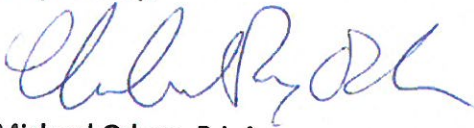
117 Lot Subdivision - 32%

26.3Ac Commercial - 34%

In conclusion DEAB feels the 27.7% is low and doesn't accurately reflect the percentage of land lost to infrastructure. The average infrastructure percentage in the 8 examples we looked at was about 36.2%. It should be noted that not all land brought into the urban growth boundary is in poorly drained soil. But based on a weighted average 32-35% is likely a more accurate range for the assumed Infrastructure Percent Deduction.

Please let us know if you have any questions.

Respectfully,



Michael Odren, R.L.A.

Chair, Development and Engineering Advisory Board



Eric E. Golemo, PE

Sub-Committee Chair, Development and Engineering Advisory Board

Attachments and Supporting Information:

- 1) Site use per code Table Projects 1-3
- 2) Project 1 - Figure
- 3) Project 2 - Figure
- 4) Project 3 - Figure
- 5) Email from Peter Tuck of Olson Engineering (7-2-2014) - Project examples
- 6) Email from Joel Stirling of Sterling Design (7-10-2014) - Project example

PROJECT	APPLICABLE CODE	LOTS	STORM	INFRASTRUCTURE	TOTAL
1	CURRENT CODE	12	6%	14%	20%
	ECOLOGY STANDARD WITH LID	11	14%	11%	25%
	ECOLOGY STANDARD - FORESTED	9	25%	14%	39%
2	CURRENT CODE	55	5%	26%	31%
	PROPOSED ORDINANCE - PASTURE	51	12%	24%	36%
	PROPOSED ORDINANCE - FORESTED	39	29%	22%	51%
3	COMMERCIAL - CURRENT CODE	-	12%	4%	16%
	COMMERCIAL - PROPOSED ORDINANCE	-	28%	4%	32%

Mike Odren

From: Peter Tuck [peter@olsonengr.com]
Sent: Wednesday, July 02, 2014 1:54 PM
To: Jamie Howsley; Eric Golemo
Cc: Mike Odren
Subject: RE: Comp Plan update infrastructure deduction

Jamie/Eric,

Regarding the area of a project impacted by road ROW and stormwater facilities in the Battle Ground area, I have the following:

18 Lot subdivision - 42%

167 lot Subdivision - 25%

117 Lot Subdivision - 32%

26.3Ac Commercial - 28% with no frontage since City did that project. If that area was included %age would increase to approximately 34%

These calculations take the developable area only and do not include wetland areas that are not impacted.

Let me know if you have any questions.

Peter.

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

From: Jamie Howsley [mailto:jamie.howsley@jordanramis.com]
Sent: Tuesday, July 01, 2014 3:38 PM
To: Eric Golemo; Peter Tuck
Cc: Mike Odren
Subject: RE: Comp Plan update infrastructure deduction

Holsinger is giving me something tomorrow. He thinks 40%

Please excuse spelling mistakes as is sent with Good via my iPhone (www.good.com)

CONFIDENTIALITY NOTICE: Please do not read, copy, or disseminate this communication unless you are the intended addressee. This e-mail may contain confidential and/or privileged information intended only for the addressee. If you have received this in error, please notify me via return e-mail.

TAX ADVICE NOTICE: IRS Circular 230 requires us to advise you that if this communication or any attachment contains any tax advice, the advice is not intended to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties or (ii) promoting, marketing, or recommending any transaction, plan, or arrangement. A taxpayer may rely on professional advice to avoid tax-related penalties only if the advice is reflected in a comprehensive tax opinion that conforms to stringent requirements. Please contact us if you

have any questions about this requirement, or would like to discuss preparation of an opinion that conforms to these IRS rules.

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Tuesday, July 01, 2014 03:34 PM Pacific Standard Time
To: Peter Tuck
Cc: Mike Odren; Jamie Howsley
Subject: RE: Comp Plan update infrastructure deduction

Were you able to come up with anything? I would like to respond to the Commissioners this week. Our office is working on some info. But, we don't have a lot going on in Battleground right now under the new code. Do you have any examples you could contribute.

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Thursday, June 26, 2014 4:05 PM
To: Peter Tuck (peter@olsonengr.com)
Cc: Mike Odren (mikeo@olsonengr.com); James Howsley (Jamie.howsley@jordanramis.com)
Subject: Comp Plan update infrastructure deduction

Peter,

Jamie and I attended the hearing on the comp plan. One of the items we are working on is the infrastructure deduction. It is currently set at 27%.

This hasn't changed with the Stormwater code. We have argued that the 27% is likely adequate where you have good to moderately draining soils but not in poorly drained soils. The commissioners asked for some supporting documentation. Our office is working on some info. But, we don't have a lot going on in Battleground right now under the new code. Do you have any examples you could contribute.

Thanks,

Eric

Eric E. Golemo, PE
Owner / Director of Engineering and Planning

SGA Engineering, PLLC

Civil Engineering / Land Use Planning

Development Services / Landscape Architecture
2005 Broadway, Vancouver WA 98663
Phone: (360)993-0911
Fax: (360)993-0912

Mbl: (360)903-1056
Email: EGolemo@sgaengineering.com

Mike Odren

From: Joel Stirling [joel@sterling-design.biz]
Sent: Thursday, July 10, 2014 1:16 PM
To: 'Eric Golemo'
Cc: 'James Howsley'
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

The stormwater management facilities would increase from 9% of the project up to 12.5% project under that scenario. Total infrastructure would go from 34% up to 37.5% if the park dedication is included or from 31% up to 34.5% without the park.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983
Mbl.(360) 600-5666

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Thursday, July 10, 2014 1:03 PM
To: 'Joel Stirling'
Cc: James Howsley
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Do you have an updated infrastructure percentage I can plug in?
Thanks,
Eric

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

From: Joel Stirling [mailto:joel@sterling-design.biz]
Sent: Thursday, July 10, 2014 12:56 PM
To: 'Eric Golemo'
Cc: 'Joel Rutherford'
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Good Afternoon Eric,

Based on the model run that I put together in the WWHM2012 program, utilizing the Auto Pond feature, the pond size went from 1.07 acres up to 2.19 acres which is roughly double the size (2.05 times larger). It is my experience that the Auto Pond feature is very conservative and the pond likely can be optimized further but even with the optimization it appears that there is a significant increase in required detention storage between the old and the new stormwater requirements for the Whispering Pines Subdivision. Let me know if there is anything else I can assist you with.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983

Mbl.(360) 600-5666

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Thursday, July 10, 2014 10:37 AM
To: 'Joel Stirling'
Cc: Joel Rutherford
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Joel,
Were you able to get an estimate under the new code?
Thanks,
Eric

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Wednesday, July 02, 2014 3:50 PM
To: 'Joel Stirling'
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Thanks.

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

From: Joel Stirling [mailto:joel@sterling-design.biz]
Sent: Wednesday, July 02, 2014 3:46 PM
To: 'Eric Golemo'; 'Jamie Howsley'; peter@olsonengr.com
Cc: mikeo@olsonengr.com
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

I am stuck in meetings for the rest of the afternoon today but will see if I or one of my staff can set up a model run in WWHM12 in the morning for comparison. As you all are aware, the requirement to utilize "old growth forest" as the pre-developed site condition is likely what will have the biggest impact on the size of the pond. I will keep you posted.

Sincerely,

Joel Gregory Stirling, P.E.
STERLING DESIGN, INC.
Ph. (360) 759-1794
Fax. (360) 759-4983
Mbl.(360) 600-5666

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

From: Eric Golemo [mailto:Egolemo@SGAengineering.com]
Sent: Wednesday, July 02, 2014 3:40 PM
To: 'Jamie Howsley'; peter@olsonengr.com
Cc: mikeo@olsonengr.com; Joel Stirling
Subject: RE: Whispering Pines Infrastructure Deduction-Battle Ground

Do we have a calculation for the new code?
Joel, have you looked at this?

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

From: Jamie Howsley [mailto:jamie.howsley@jordanramis.com]
Sent: Wednesday, July 02, 2014 2:54 PM

To: Eric Golemo; peter@olsonengr.com
Cc: mikeo@olsonengr.com; Jamie Howsley
Subject: Whispering Pines Infrastructure Deduction-Battle Ground

Eric and Peter,

Attached is the infrastructure deduction for Holsinger's Whispering Pines subdivision. It is approved however under the old stormwater rules. I am being told that the stormwater would likely double if under the new rules.
As you can see with the park it is 34% without 31%.

Best,

Jamie

JAMES D. HOWSLEY | Attorney
Jordan Ramis PC | Attorneys at Law | Celebrating 50 years WA Direct:
360-567-3913
OR Direct: 503-598-5592
OR Main: 503-598-7070

CONFIDENTIALITY NOTICE: Please do not read, copy, or disseminate this communication unless you are the intended addressee. This e-mail may contain confidential and/or privileged information intended only for the addressee. If you have received this in error, please notify me via return e-mail.

TAX ADVICE NOTICE: IRS Circular 230 requires us to advise you that if this communication or any attachment contains any tax advice, the advice is not intended to be used, and cannot be used, for the purpose of (i) avoiding tax-related penalties or (ii) promoting, marketing, or recommending any transaction, plan, or arrangement. A taxpayer may rely on professional advice to avoid tax-related penalties only if the advice is reflected in a comprehensive tax opinion that conforms to stringent requirements. Please contact us if you have any questions about this requirement, or would like to discuss preparation of an opinion that conforms to these IRS rules.

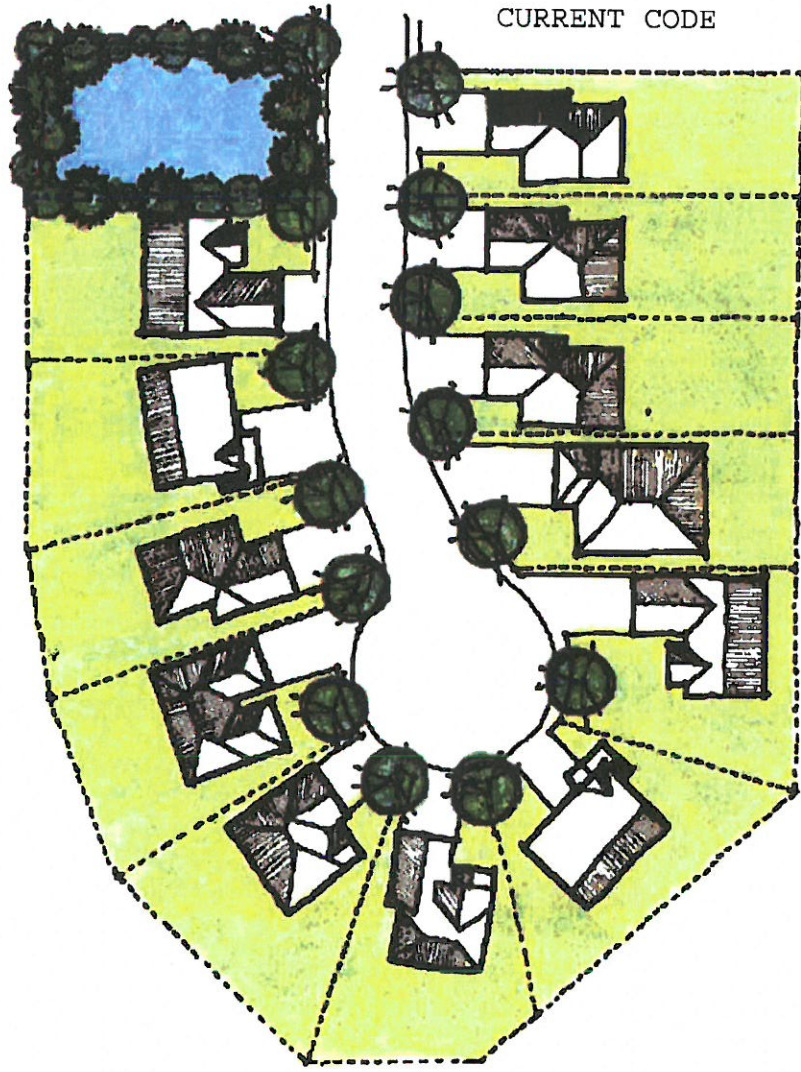
-----Original Message-----

From: MPC6000-VAN@jordanramis.com [mailto:MPC6000-VAN@jordanramis.com]
Sent: Wednesday, July 02, 2014 2:51 PM
To: Jamie Howsley
Subject:

This E-mail was sent from "MPC6000-VAN" (Aficio MP C6000).

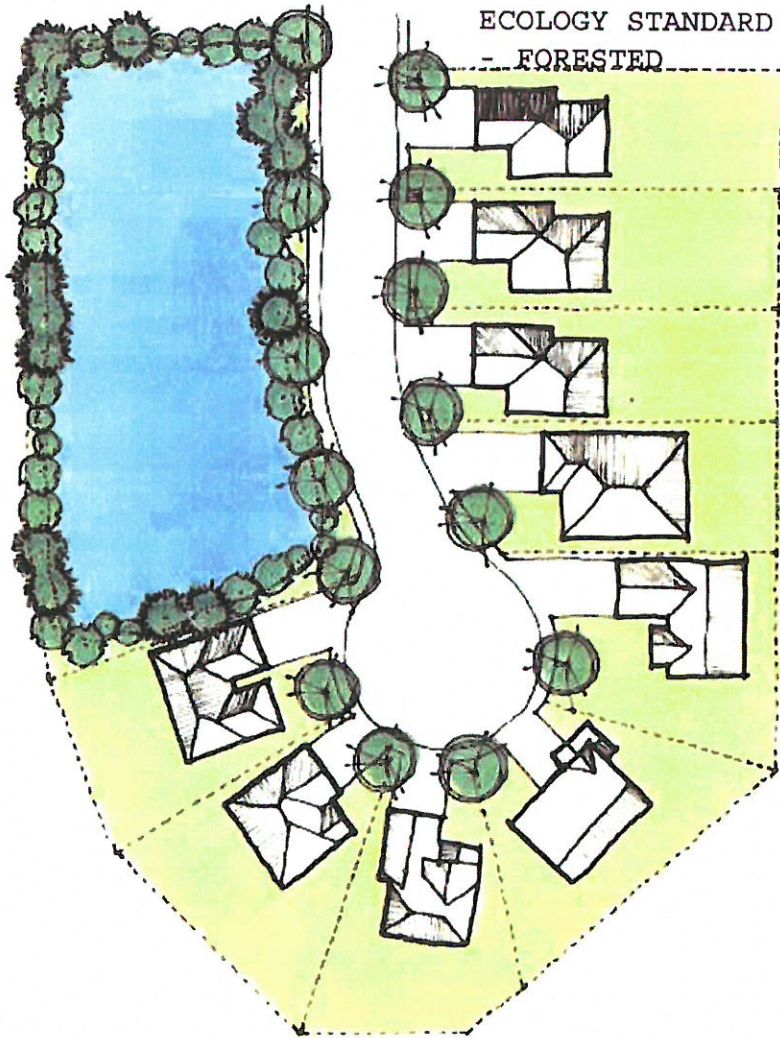
Scan Date: 07.02.2014 14:50:45 (-0700)
Queries to: MPC6000-VAN@jordanramis.com

CURRENT CODE

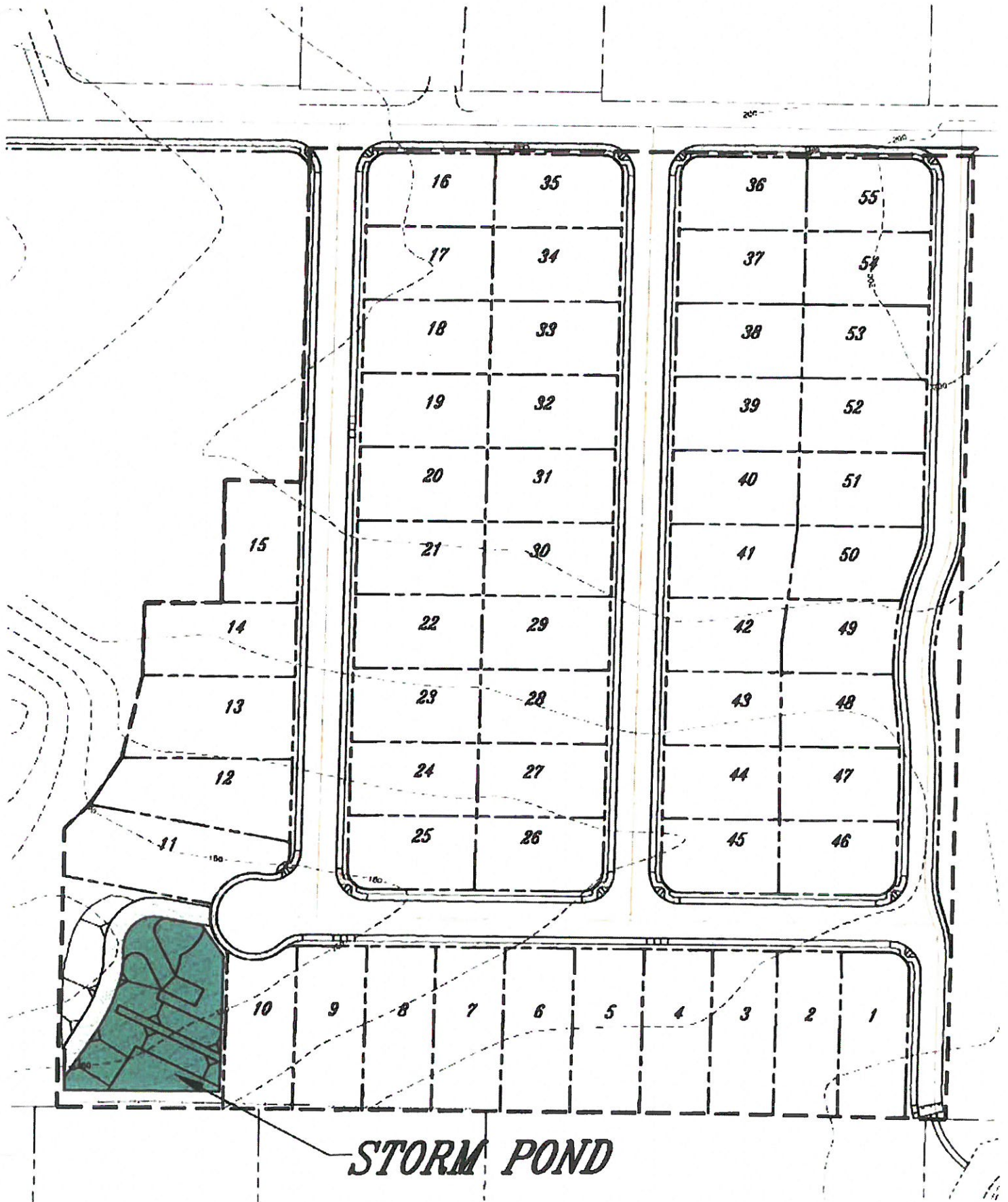


ECOLOGY STANDARD
- WITH LID

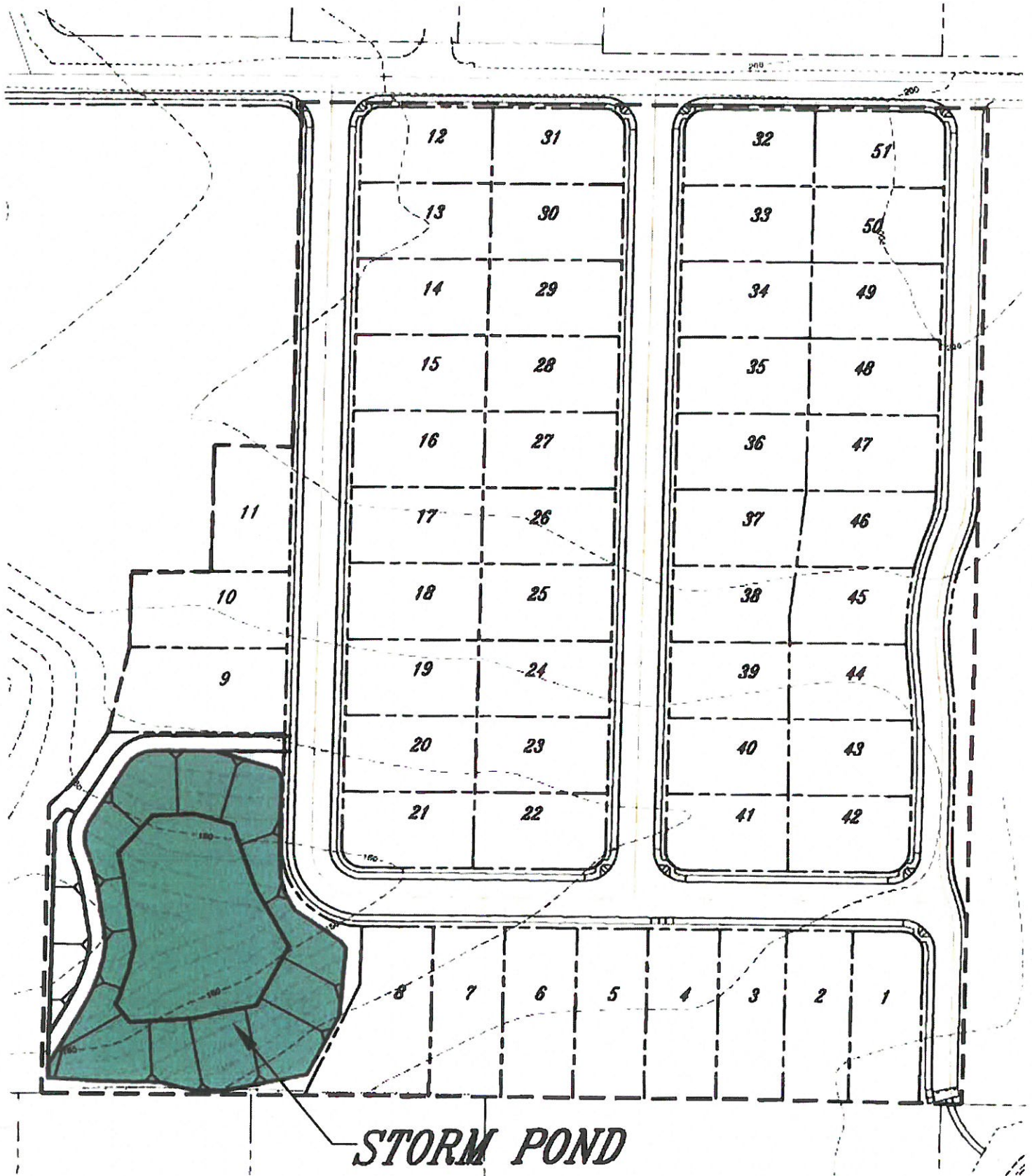




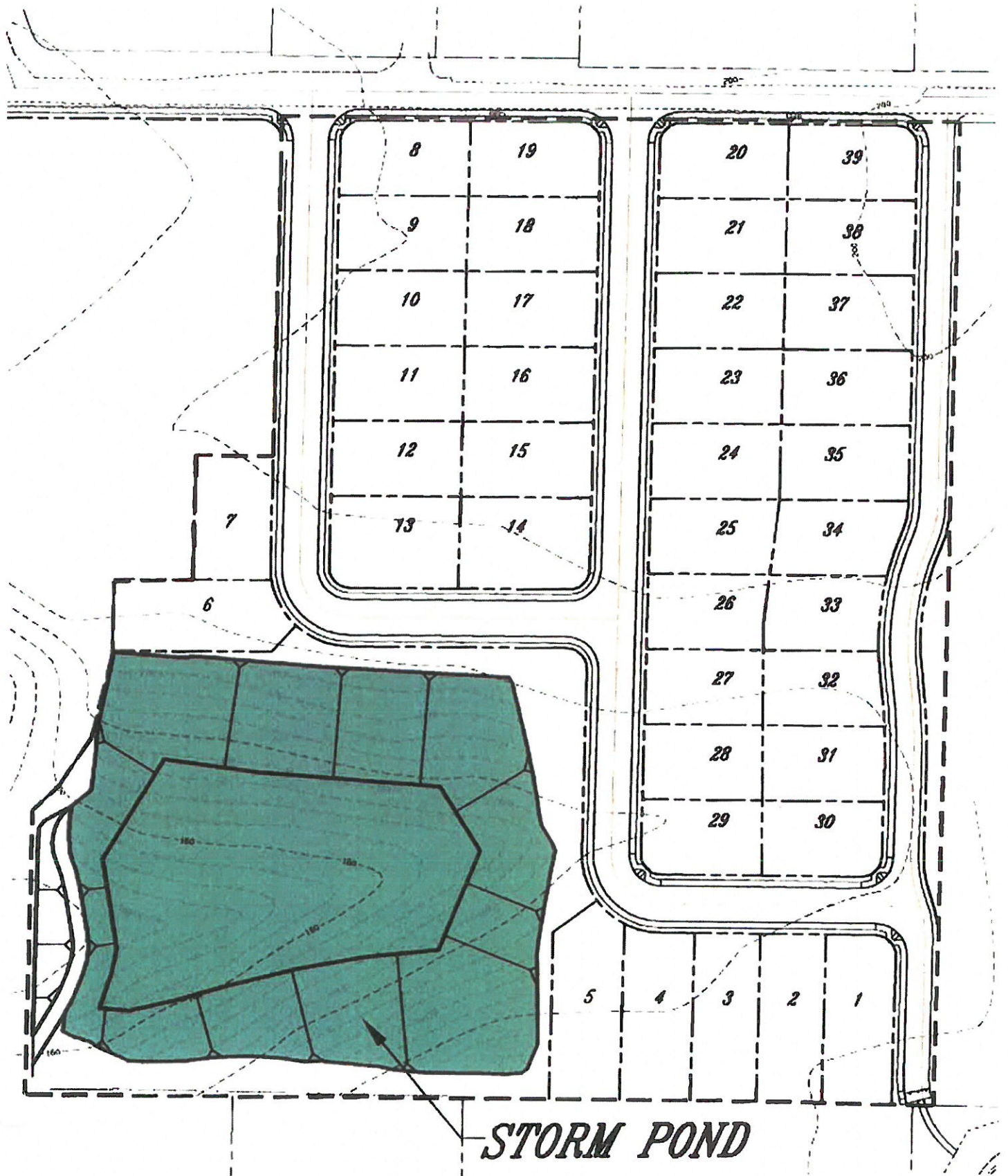
POND UNDER CURRENT STORM URDINANCE



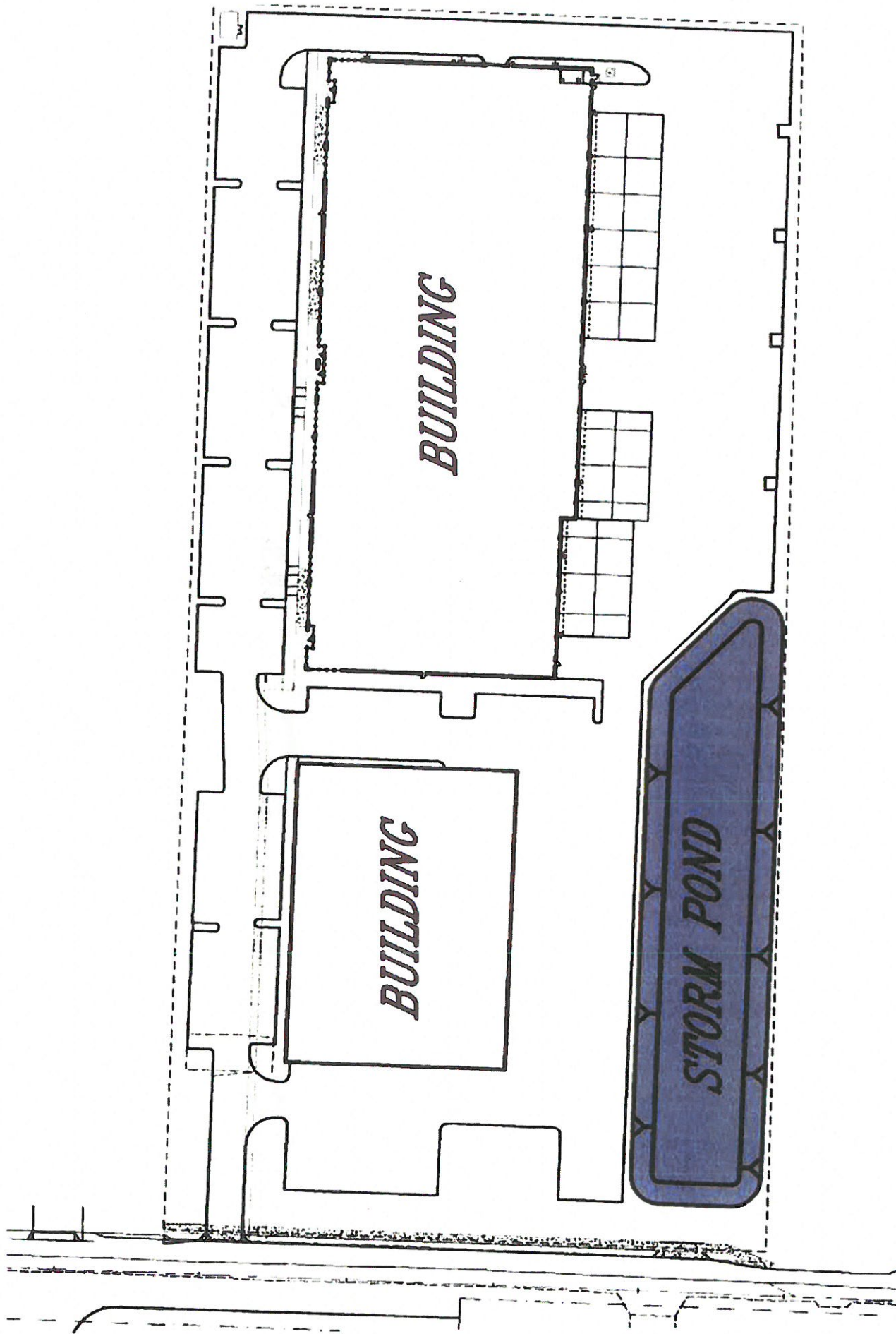
POND UNDER PROPOSED STORM ORDINANCE (PREDEVELOPED PASTURE CONDITION)



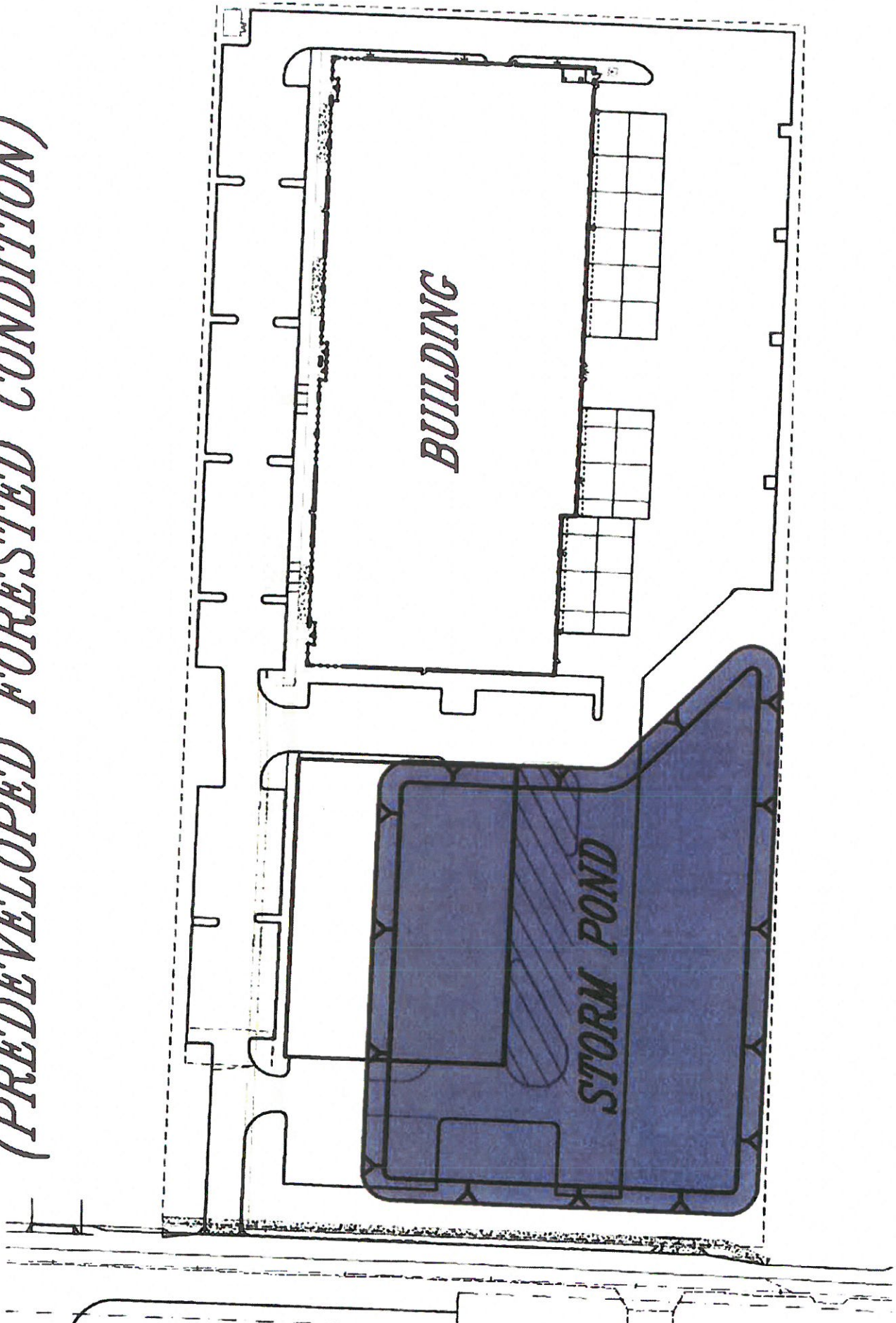
POND UNDER PROPOSED STORM URDINANCE (PREDEVELOPED FORESTED CONDITION)



POND UNDER CURRENT STORM ORDINANCE



*POND UNDER PROPOSED STORM ORDINANCE
(PREDEVELOPED FORESTED CONDITION)*



O'Donnell, Mary Beth



CP16 #0204

From: Euler, Gordon
Sent: Friday, August 01, 2014 10:32 AM
To: O'Donnell, Mary Beth
Subject: FW: Following up with requested information from 07/11 City-County Coordination Meeting
Attachments: Site Use Per Code Exhibit.pdf; Project 1.pdf; Project 2.pdf; Project 3.pdf; Project 4.pdf; 20140702145045432.pdf; Issue_Paper_5_SEPA_Scoping_7-11.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Mary Beth:

For the index. You might have this already. Thanks.

Gordy

From: McCall, Marilee
Sent: Friday, July 11, 2014 4:55 PM
To: Amanda Smeller-Woodland; Snodgrass, Bryan; Eiken, Chad; Elizabeth Decker-Consultant; Eric Eisemann-Consultant; Erin Erdmand-Battle Ground; Jeff Sarvis-La Center; Lee Knottnerus-Ridgefield; Mitch Kneipp-Washougal; James Weldon; Phil Bourquin-Camas; Robert Maul-Camas; Sam Crummett-Battle Ground; Towne, Sandra; Sara Fox-Camas; 'Steve Stuart-Ridgefield'
Cc: Orjiako, Oliver; Euler, Gordon; Anderson, Colete
Subject: FW: Following up with requested information from 07/11 City-County Coordination Meeting

As I feared, the memo is too large and the first transmission failed. Sending again with all other information.

I'm going to have to send the memo with attachments regarding rural lands in a separate cover, or figure out another way to get it to you on Monday.

Have a great weekend and thanks for your patience.

Marilee McCall
Administrative Assistant | Community Planning
360.397.2280 ext. 4558

From: McCall, Marilee
Sent: Friday, July 11, 2014 4:52 PM
To: Amanda Smeller-Woodland; Snodgrass, Bryan; Eiken, Chad; Elizabeth Decker-Consultant; Eric Eisemann-Consultant; Erin Erdmand-Battle Ground; Jeff Sarvis-La Center; Lee Knottnerus-Ridgefield; Mitch Kneipp-Washougal; James Weldon; Phil Bourquin-Camas; Robert Maul-Camas; Sam Crummett-Battle Ground; Towne, Sandra; Sara Fox-Camas; 'Steve Stuart-Ridgefield'
Cc: Orjiako, Oliver; Euler, Gordon; Anderson, Colete
Subject: Following up with requested information from 07/11 City-County Coordination Meeting

Not sure if this will come through for all of you, as one of the documents is 14MB.

Olson Engineering provided 4 examples in the Battleground area. No exhibits are attached but I am sure they could provide some.

The summary is below:

18 Lot subdivision - **42%**

.67 lot Subdivision - **25%**

117 Lot Subdivision - **32%**

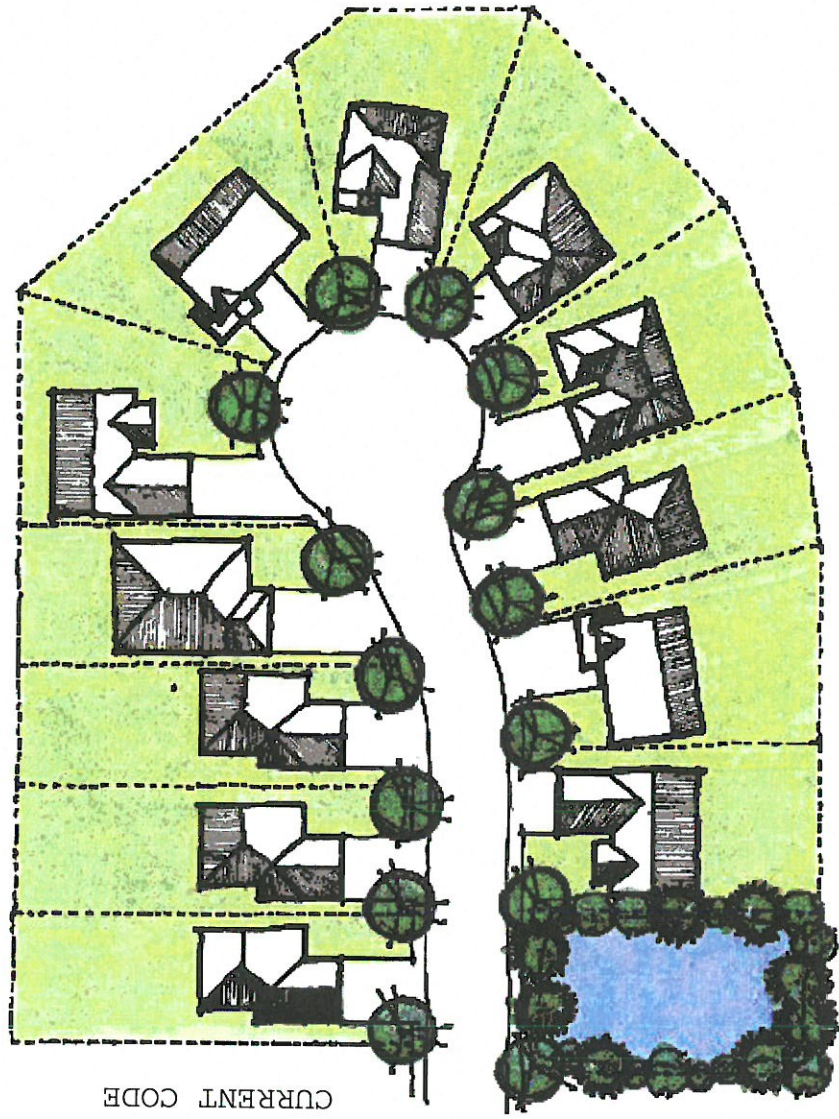
26.3Ac Commercial - **34%**

The take away so far is that 27% is likely low. 33-35% is likely a more accurate range.

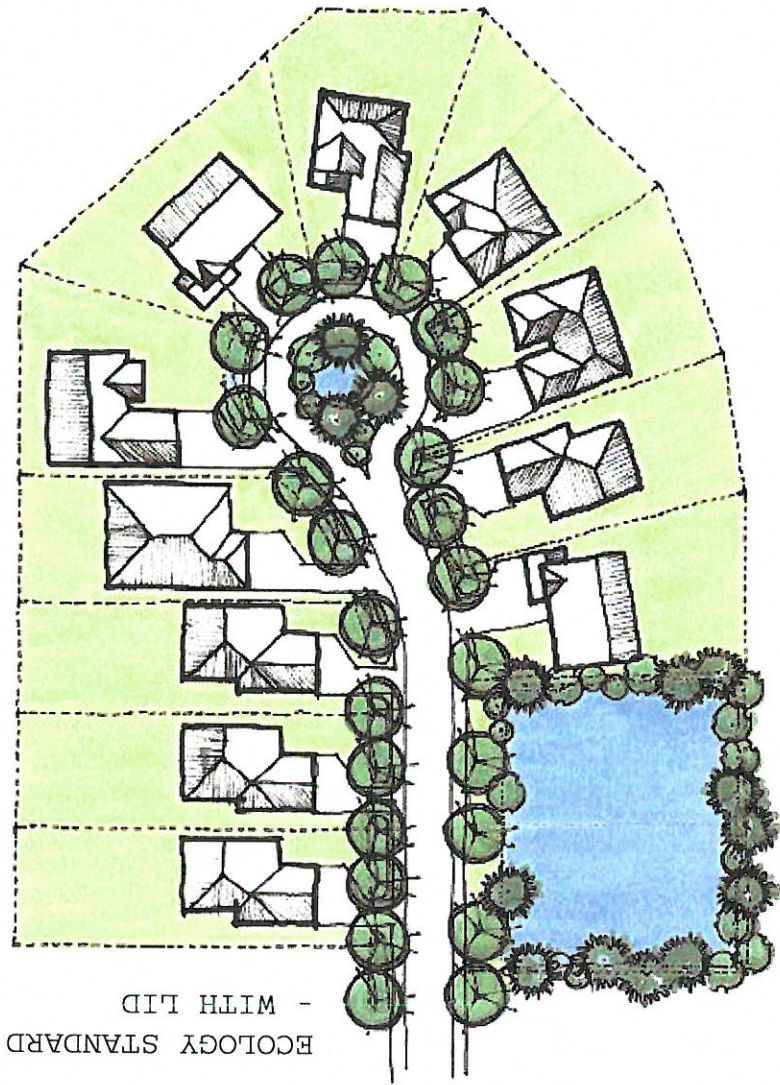
Sincerely,

Eric E. Golemo, PE
Owner / Director of Engineering and Planning
SGA Engineering, PLLC
Civil Engineering / Land Use Planning
Development Services / Landscape Architecture
2005 Broadway, Vancouver WA 98663
Phone: (360)993-0911
Fax: (360)993-0912
Mbl: (360)903-1056
Email: EGolemo@sgaengineering.com

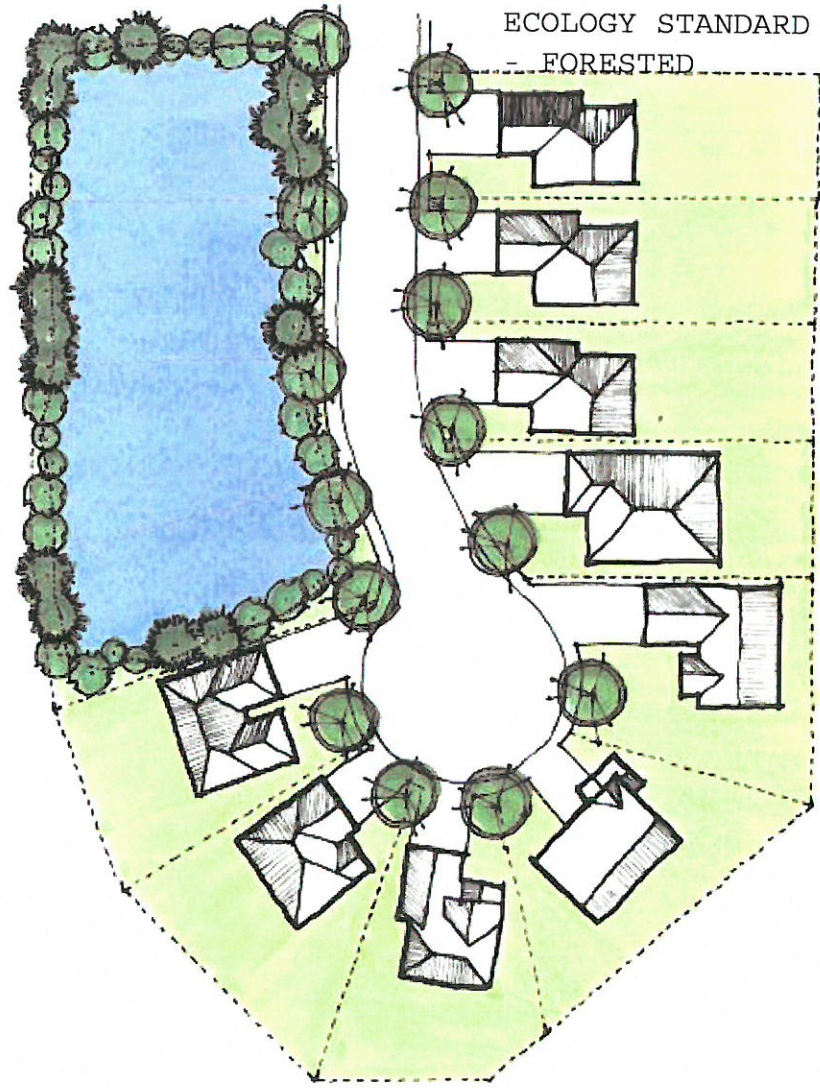
PROJECT	APPLICABLE CODE	LOTS	STORM	INFRASTRUCTURE	TOTAL
1	CURRENT CODE	12	6%	14%	20%
	ECOLOGY STANDARD WITH LID	11	14%	11%	25%
	ECOLOGY STANDARD - FORESTED	9	25%	14%	39%
2	CURRENT CODE	55	5%	26%	31%
	PROPOSED ORDINANCE - PASTURE	51	12%	24%	36%
	PROPOSED ORDINANCE - FORESTED	39	29%	22%	51%
3	COMMERCIAL - CURRENT CODE	-	12%	4%	16%
	COMMERCIAL - PROPOSED ORDINANCE	-	28%	4%	32%
4	PROPOSED ORDINANCE - FIELD	66	8%	17%	25%
	PROPOSED ORDINANCE - FORESTED	54	21%	14%	35%



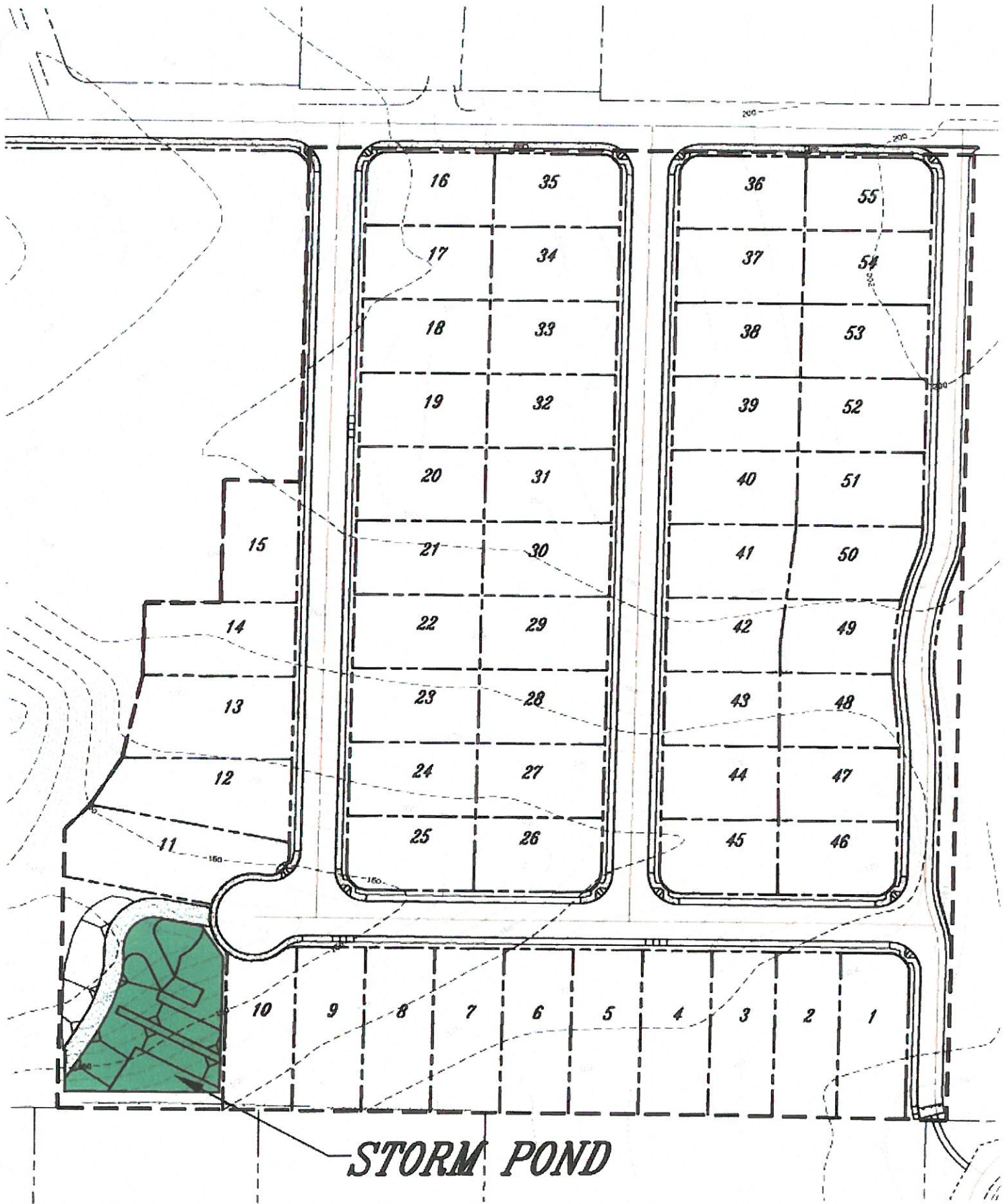
CURRENT CODE



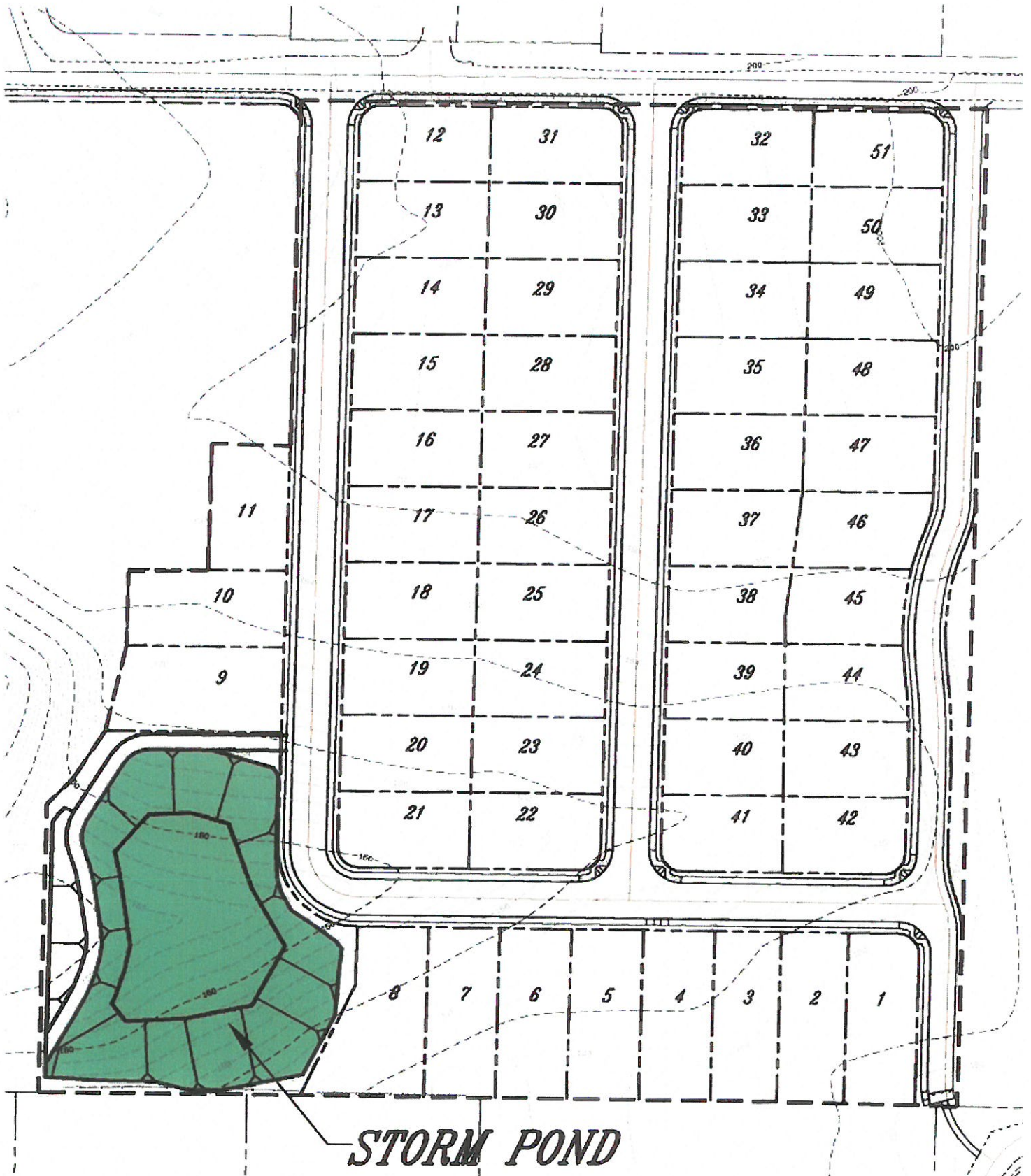
ECOLOGY STANDARD
- WITH LID
DIT HLIM



POND UNDER CURRENT STORM ORDINANCE



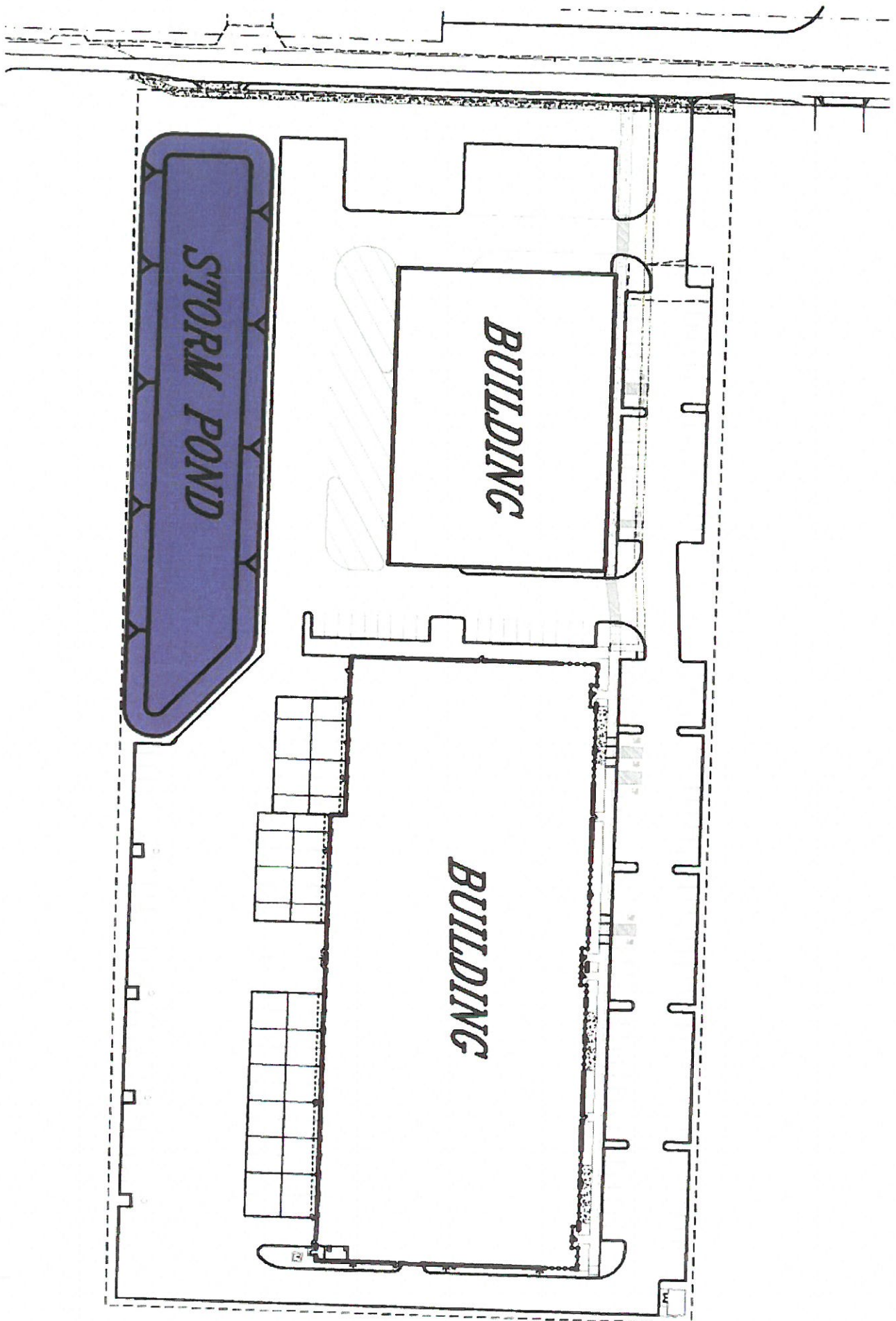
POND UNDER PROPOSED STORM ORDINANCE (PREDEVELOPED PASTURE CONDITION)



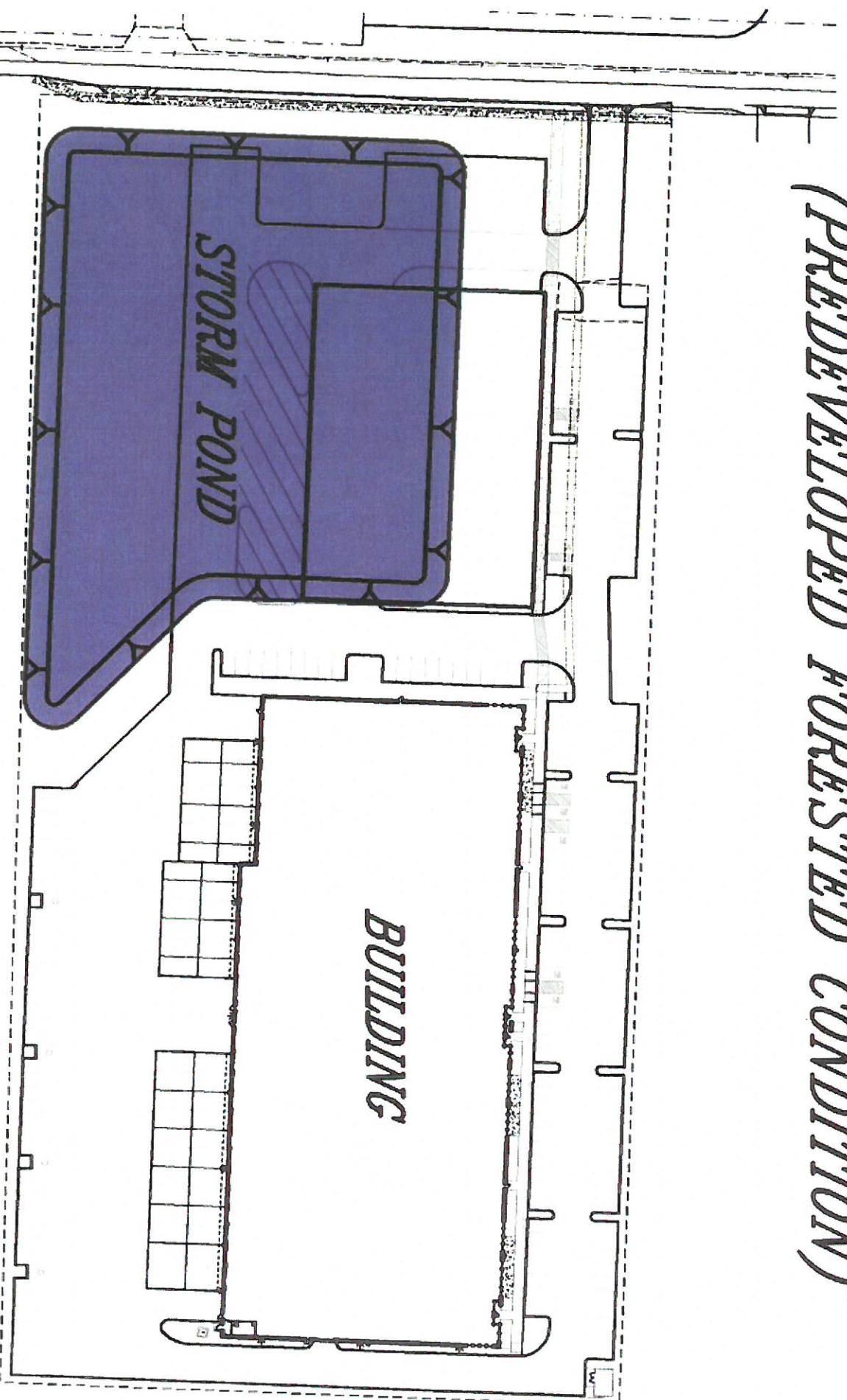
POND UNDER PROPOSED STORM ORDINANCE (PREDEVELOPED FORESTED CONDITION)



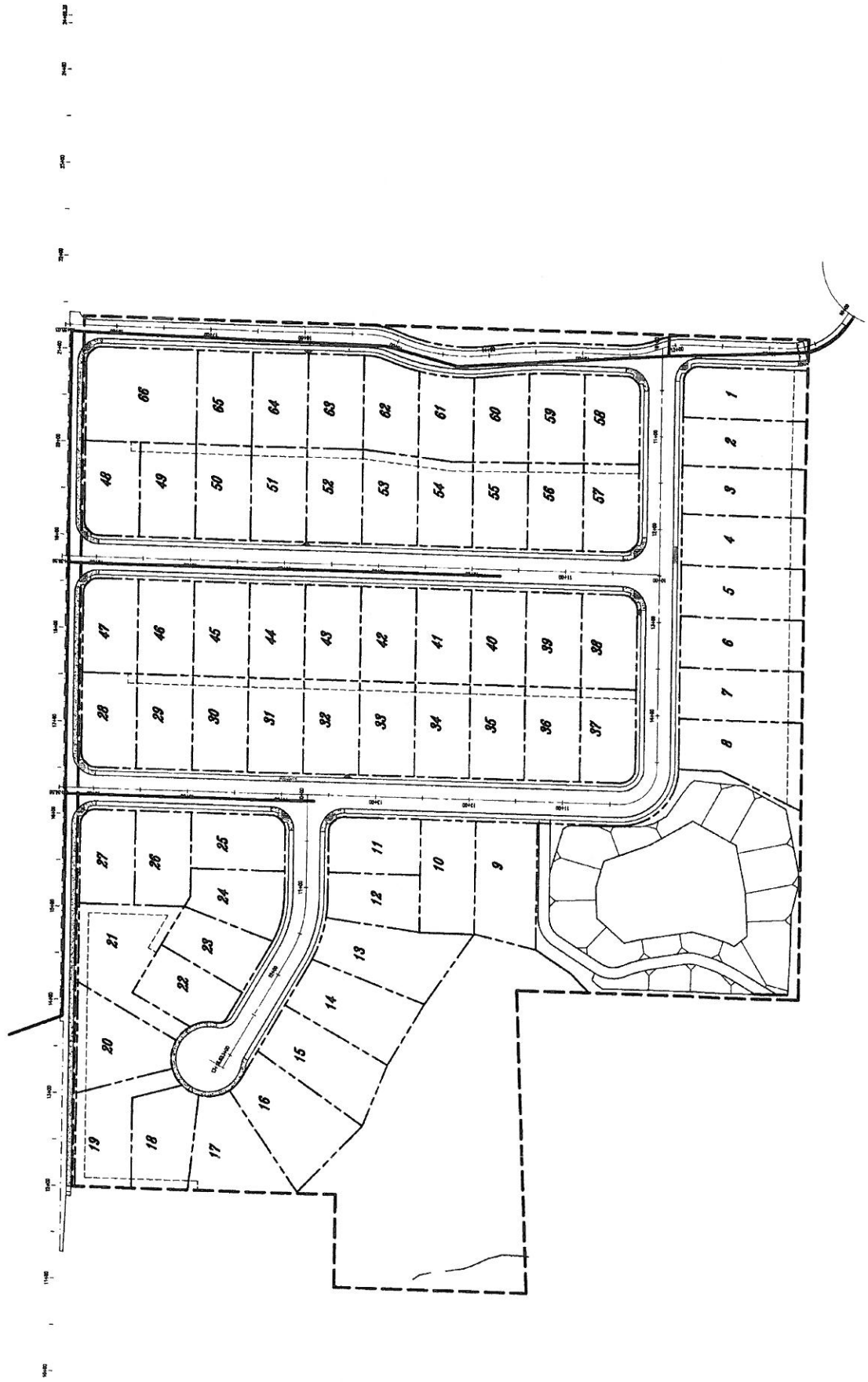
POND UNDER CURRENT STORM ORDINANCE



*POND UNDER PROPOSED STORM ORDINANCE
(PREDEVELOPED FORESTED CONDITION)*



POND UNDER PROPOSED STORM ORDINANCE (FIELD CONDITION)





STERLING DESIGN INC. JOB #: 444

2208 E. Evergreen Blvd., Suite A, Vancouver, WA 98661
Ph: (360) 759-1794 Fx: (360) 759-4983
Email: mail@sterling-design.biz

Date: July 02, 2014

Project: Whispering Pines Subdivision – SUB: 02-10

% of Whispering Pines Subdivision Dedication for 1,265,717 sq.ft. parcel (29.05 acres)

- Right of Way Dedication: 285,048 sq.ft. (6.54 acres) 22%
- Storm Facilities Dedication: 112,038 sq.ft.(2.57 acres) 9%
- Park Dedication: 43, 560 sq.ft. (1.00 acres) 3%

Clark County Comprehensive Plan 2016 Update

Planning for growth 2015 – 2035

SEPA Scoping – Issue Paper 5

Purpose

This memorandum provides a basic framework and starting point from which the county and its cities will launch the environmental impact review process under the State Environmental Policy Act (SEPA). This process will be used to inform the public about three proposed growth alternatives, advertise the county's intent to prepare a Supplemental Environmental Impact Statement (SEIS), and provide an opportunity to comment on the scope of impacts to be examined in the SEIS.

Background

In July 2013, Clark County began updating its Comprehensive Growth Management Plan to meet the 2016 periodic update requirement of RCW 36.70A.140. Community Planning prepared the following issue papers to help the Board of County Commissioners make decisions about the update:

- Issue Paper 1 - Comprehensive Plan Overview: A summary of the county's Planning Assumptions, 2013 vacant and buildable lands model (VBLM) inventory and population and employment projections.
- Issue Paper 2 – Population and Job Projections: Background information for a discussion with the cities and the town of Yacolt on population and job planning assumptions for 2015-2035. On Jan. 21, 2014, the Board adopted the state Office of Financial Management's (OFM) medium population projection of 562,207 for the 20-year period ending 2035 (Res. 2014-01-09).
- Issue Paper 3 – Employment forecast based on input from Washington Employment Security Department (ESD). It was revised as Issue Paper 3.1 to include the 2014 VBLM information. On April 29, 2014, the Board adopted the high employment forecast of 91,200 net new jobs for the 20-year period ending 2035 (Res. 2014-04-01).
- Issue Paper 4 – Population and Job Allocation: On June 24, 2014, the Board identified the methodology for allocating growth by UGA and adopted preliminary allocations for initial review (Res. 2014-06-17).

This issue paper, Issue Paper 5, will discuss the environmental impact review process under the State Environmental Policy Act (SEPA) and seek Board direction on development of alternatives.

SEPA Process

Enacted in 1984, the State Environmental Policy Act (SEPA) requires local governments to evaluate environmental impacts that could result from actions they approve or undertake. The most common evaluation is to discuss potential impacts of a proposed development on various resources and qualities of the environment listed on the SEPA checklist. There also are non-project actions that are reviewed, such as adoption of code language or a new plan or policy. The completed checklist is shared with federal, state and local agencies, Indian tribes, neighborhood organizations and interested parties.

Large development projects, such as an asphalt plant, and certain non-development projects, such as expansion of an urban growth area, require a more in-depth SEPA review, including, 1) identification and analysis of potential project-related impacts, and 2) consideration of possible alternatives to the proposed action. An environmental impact statement (EIS) is prepared, discussing any potential impacts. The county prepared an EIS in 2007, issuing both a draft EIS (DEIS) and a final EIS (FEIS). Comments on alternatives presented in the draft were used to determine a preferred alternative that was the focus of analysis in the FEIS.

For the 2016 update, the county is proposing to add to the 2007 environmental analysis, as needed, by preparing a supplemental EIS (SEIS). Under SEPA, analysis of a plan's impacts is not required to be site-specific, but rather give an overview of impacts that could be expected under the alternatives.

The EIS process under SEPA begins with a scoping process. That is when the county seeks public input and Board direction to define issues related to the comprehensive plan update that will be addressed in the draft SEIS. The preferred alternative studied in the final SEIS and eventually adopted by the Board will reflect local jurisdictions' input, Board directives, guiding principles and values and countywide planning policies. The SEIS and comprehensive planning process will end with adoption of an updated comprehensive growth management plan for Clark County.

Methodology

Since Clark County's 2007 Comprehensive Growth Management Plan update, conditions in the county, as well as state and federal laws, have changed, requiring corresponding changes to the plan. The Board has adopted planning assumptions and principles and values that provide policy direction for reviewing and updating the county's growth management plan by June 2016.

As stated above, preparation of an EIS must include alternatives, including a 'no action' alternative that maintains the status quo. Possible alternatives for review in the EIS are listed below.

Alternative 1: No Action Alternative. This alternative is the adopted Comprehensive Plan as amended in July 2014, with the current urban growth boundaries, planning assumptions, policies and implementation ordinances.

Alternative 2: County-Initiated Actions.

- a) Urban growth areas adopted in July 2014.
- b) Rural Land amendments to the Zoning Map, such as AG-20 to AG-10, FR-40 to FR-20 and R-20 to R-10, where needed.
- c) Washougal UGA amendments to the Zoning Map to reflect county zoning and application of Urban Holding.
- d) Vancouver UGA amendments to the Zoning Map to remove the Three Creeks Overlay.
- e) Removal of Urban Holding in the Vancouver UGA area known as Fisher's Swale.
- f) New Public Facility zone.
- g) Eliminate Comprehensive Plan Chapter 1 Table 1.6, Mixed Use footnote and subsequent Comprehensive Plan and Zoning changes.
- h) Streamline commercial zones from three to two.

- i) Zoning Map changes to include property owner site-specific requests, particularly within the Salmon Creek and Discovery planning areas.
- j) Zoning Map cleanup of Urban Reserve application consistency, UR-10, UR-20 and UR-40; Comprehensive Plan and Zoning Map cleanup of Urban Holding application consistency.
- k) New Arterial Atlas Map for bicycles.
- l) At the request of property owners, sites that meet Board directives and other criteria. The new planning assumptions, policy direction, principles and values defined by the commissioners will be used in this alternative.

Alternative 3: City-Requested Actions.

- a) Urban growth areas adopted in July 2014.
- b) Expansion areas proposed by cities in July 2014.

After the scoping process, land use alternatives will be developed based on technical analysis, input from cities, the Board’s principles and values and results of the environmental scoping and analysis. From the DSEIS, a preferred alternative will emerge, providing a 20-year land supply and meeting the 2014 planning assumptions and policy directions.

NEXT STEPS

During four open houses in August, the public is invited to comment on the scope of impacts to be examined in the Supplemental Environmental Impact Statement. All open houses will be 7 - 8:30 p.m. Here are the open house dates and locations:

Tuesday, Aug. 19	Fort Vancouver Community Library, 901 C St., Vancouver
Wednesday, Aug. 20	Lacamas Lake Lodge, 227 N.E. Lake Rd., Camas
Wednesday, Aug. 27	Ridgefield Community Center, 210 N. Main Ave., Ridgefield
Thursday, Aug. 28	Battle Ground Community Center, 9123 E. Main St., Battle Ground

O'Donnell, Mary Beth



CP16#0205

From: Euler, Gordon
Sent: Friday, August 01, 2014 10:25 AM
To: O'Donnell, Mary Beth
Subject: FW: TRi mountain
Attachments: Tri Mountain Parcel # v2.pdf; Tri Mountain UGA #2.pdf; Tri Mountain addresses.xlsx

Follow Up Flag: Follow up
Flag Status: Completed

Mary Beth:

For the index. Thanks.

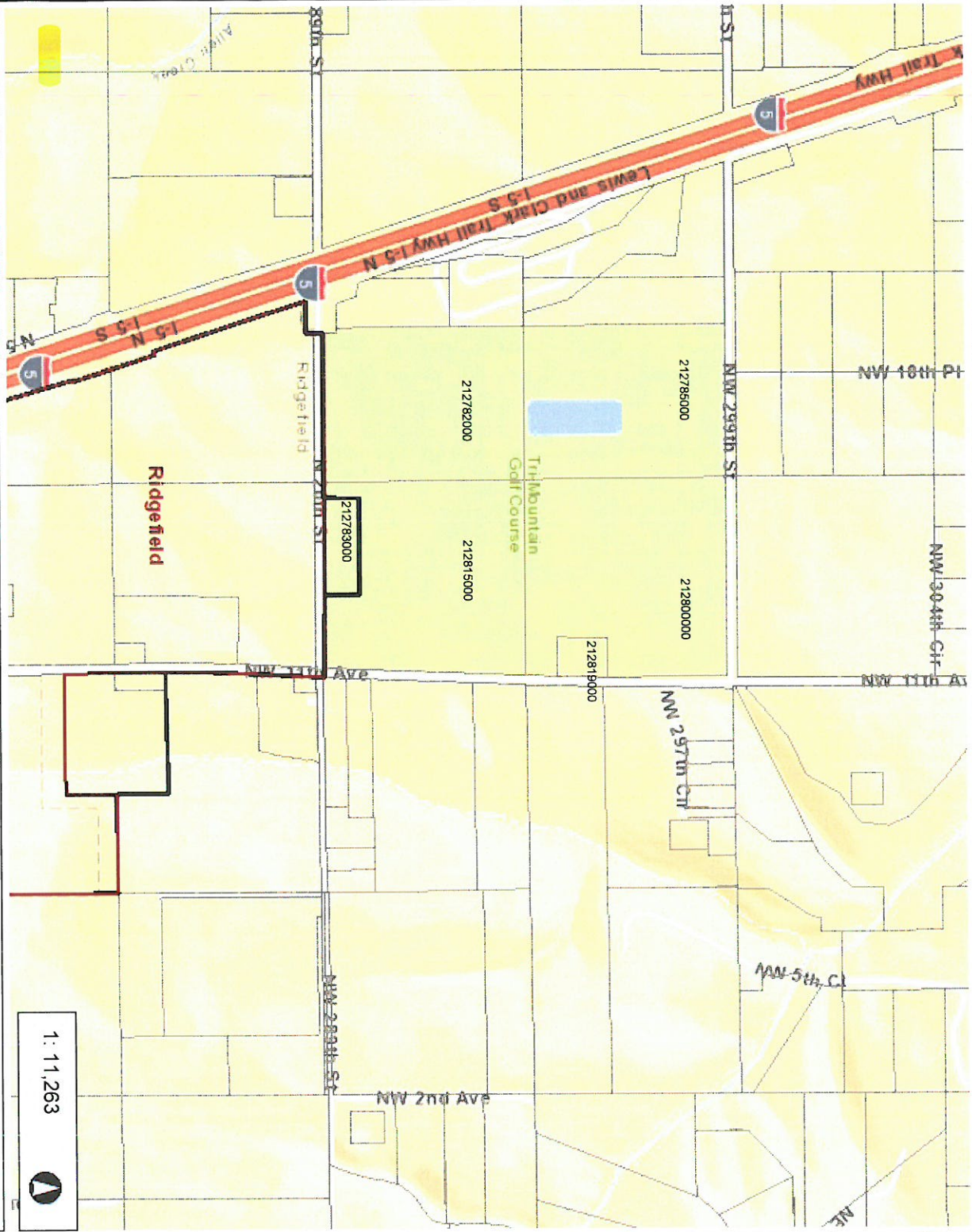
Gordy

From: Eric Eisemann [<mailto:e.eisemann@e2landuse.com>]
Sent: Friday, July 25, 2014 2:03 PM
To: Orjiako, Oliver; Euler, Gordon
Subject: TRi mountain

Eric Eisemann
E2 Land Use Planning, LLC
215 W. 4th Street, Suite # 201
Vancouver, WA 98660
360.750.0038
e.eisemann@e2landuse.com



Tri Mountain Parcel

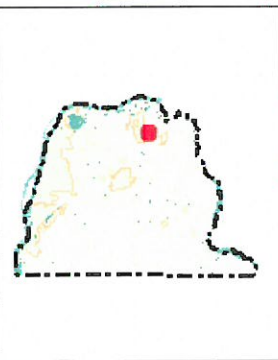


WGS_1984_Web_Mercator_Auxiliary_Sphere
 Clark County, WA, GIS - <http://gis.clark.wa.gov>

1: 11,263



This map was generated by Clark County's "MapOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.



- Legend**
- Cities Boundaries
 - Urban Growth Area Boundary
 - Building Footprints
 - Taxlots
 - World Street Map

Notes:

Tri Mountain Golf Course UGA Expansion						
7/23/2014						
Parcel #	Acres	Comp Plan	Situs Address	Owner	Address	Legal
212785000	30.00	P/OS	1701 NW 299th St. Ridgefield, 98642	Clark County General Services	PO Box 5000 Vancouver, WA 98666	#16 SEC 16 T4NR1EWM 30A
212800000	38.00	P/OS	"	"	"	#31 SEC 16 T4N R1EWM 38.00A
212782000	29.99	P/OS	"	"	"	#13 SEC 16 T4NR1EWM 29.99A
212815000	34.00	P/OS	1504 NW 289th Ridgefield, WA 98642	"	"	#46 SEC 16 T4N R1EWM 34.0A
212819000	2.00	P/OS	29420 NW 11th Ave. Ridgefield, WA 98642	Gerald & Grace Koethe	29420 NW 11th Ave. Ridgefield, WA 98642	#41 SEC 16 T4N R1EWM 2A
212783000	3.64	UL UH-20	6110 N 20th St. Ridgefield, WA 98642	Martha Steiger & Helen Erickson	12808 NE 4th Ave. Vancouver, WA 98685	#14 SEC 16 T4N R1EWM 3.64A
	137.63	Total Acres				
		Tri				
	131.99	Mountain				

O'Donnell, Mary Beth



CP16 # 0206

From: Euler, Gordon
Sent: Friday, August 01, 2014 10:23 AM
To: O'Donnell, Mary Beth
Subject: FW: Tri-Mountain Golf Course

Follow Up Flag: Follow up
Flag Status: Flagged

Mary Beth:

For the index. Thanks.

Gordy

From: Eric Eisemann [<mailto:e.eisemann@e2landuse.com>]
Sent: Wednesday, July 30, 2014 10:49 AM
To: Euler, Gordon
Cc: 'Elizabeth Decker'; McCauley, Mark; steve.stuart@ci.ridgefield.wa.us; Orjiako, Oliver
Subject: RE: Tri-Mountain Golf Course

Gordy,
The City Manager and I discussed the State-owned parcels. There are four intervening parcels (two on the north end and two on the south end) that are not owned by the State. It is our opinion that zoning in the State-owned land may be desirable but adding the four intervening parcels (zoned P/OS but potentially developable as residential) potentially complicates the scope of the original idea of assisting the County with the Tri-Mountain lands. **We propose limiting the scope of the UGA expansion to the original proposal.**

Please let me know if you would like to discuss this further.
Eric

From: Euler, Gordon [<mailto:Gordon.Euler@clark.wa.gov>]
Sent: Wednesday, July 30, 2014 10:30 AM
To: 'Eric Eisemann'
Cc: 'Elizabeth Decker'; McCauley, Mark; steve.stuart@ci.ridgefield.wa.us; Orjiako, Oliver
Subject: RE: Tri-Mountain Golf Course

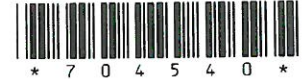
Eric:

Thanks to you and Steve for meeting with us on Monday. We acknowledge receiving the information below. The next step for us is to determine if the state has any issue with including the Weigh Station in the Ridgefield boundary expansion. We'll keep you posted on what we find out.

Gordy Euler
Clark County Community Planning

From: Eric Eisemann [<mailto:e.eisemann@e2landuse.com>]
Sent: Tuesday, July 29, 2014 10:57 AM

O'Donnell, Mary Beth



CP 16#0207

From: Orjiako, Oliver
Sent: Monday, August 04, 2014 3:48 PM
To: Cook, Christine; Euler, Gordon; Alvarez, Jose
Cc: O'Donnell, Mary Beth; Benton, Don
Subject: RE: Rocue Merritt

Follow Up Flag: Follow up
Flag Status: Flagged

That is correct and I informed Don that the burden is on the property owner to make the case for de-designation and not on Clark County.

From: Cook, Christine
Sent: Monday, August 04, 2014 3:46 PM
To: Orjiako, Oliver; Euler, Gordon; Alvarez, Jose
Cc: O'Donnell, Mary Beth
Subject: RE: Rocue Merritt

FYI – this land is all F-2, and the county land to the north, according to GIS is in forest use.

From: Orjiako, Oliver
Sent: Monday, August 04, 2014 3:10 PM
To: Euler, Gordon; Alvarez, Jose
Cc: Cook, Christine; O'Donnell, Mary Beth
Subject: FW: Rocue Merritt

Mary Beth for index. Thanks.

From: Benton, Don
Sent: Wednesday, July 30, 2014 6:56 PM
To: Orjiako, Oliver
Cc: Vandling, Jim; Mielke, Tom
Subject: FW: Rocue Merritt

Oliver,

I have attached an official request to re-zone from Rocue Merritt. I am attaching the request to this email and am asking that you make it part of the package of requests that go before the board.

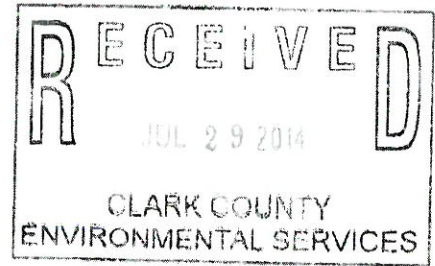
Thanks,

Don

Don
Don Benton
Director, Environmental Services Department
360-397-2121 extension 5358



Mr. Oliver Orjiako
Clark County Community Planning Department
1300 Franklin Ave.
Vancouver, WA 98666



Dear Mr. Orjiako,

I am writing to you regarding our family property located by Green Mountain. I have attached a map identifying for you the tax lots and the location of our properties. Our property tax numbers are 173159000, 173185000, and 173191000.

As you can see we are bordered to the north by County owned property and the black lines to the east, west, and South represent the Camas City border that surrounds the rest of our property. Our property is located in unincorporated Clark County.

I am requesting the County re-zone our properties from forest and agriculture to Rural Residential 5 (R5) in the annual comprehensive plan update.

Looking at the photos of our property you can see we are an island surrounded by Camas to our South, East and West, and by the County land to our North. Camas has plans to put in over 1,600 homes to our South, East, and West.

Your assistance in changing our zoning from F-40 to R5 in the next annual comprehensive plan update would be greatly appreciated.

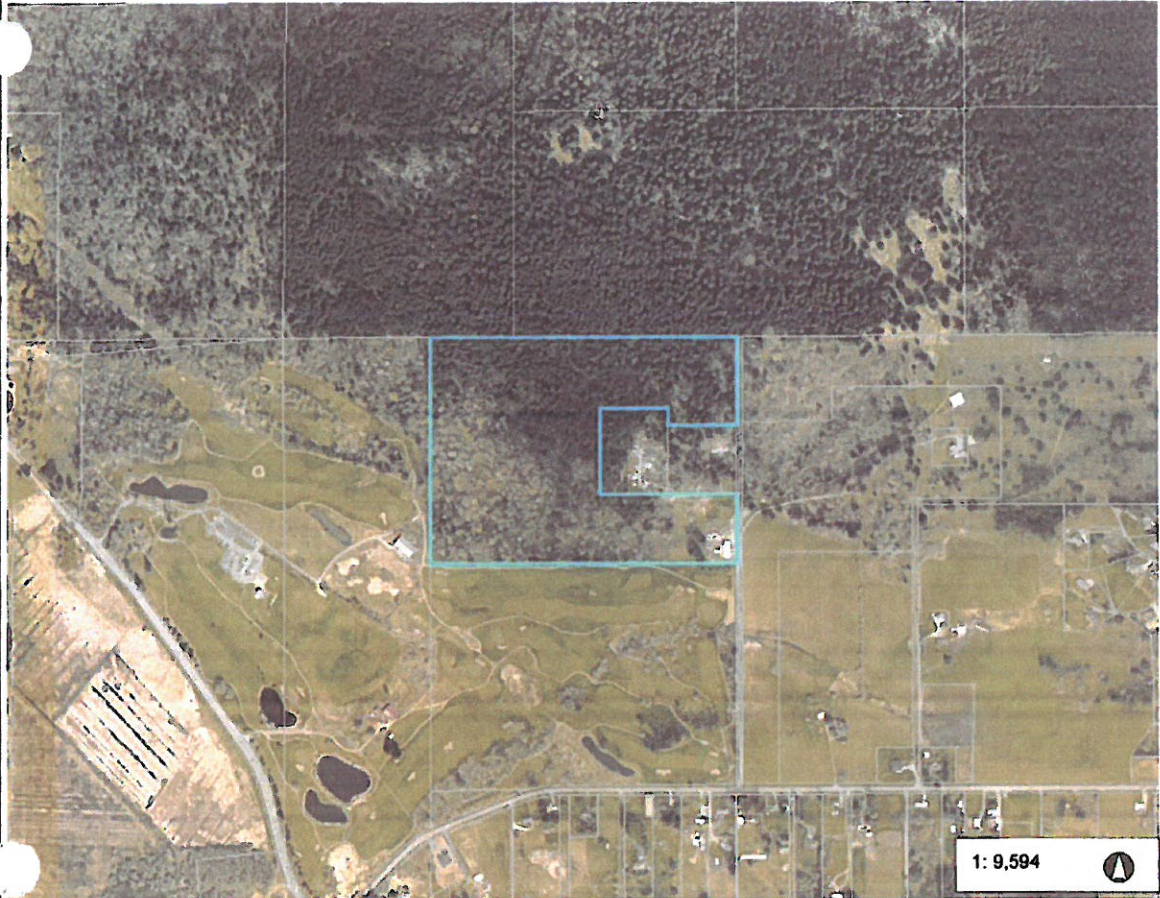
Thank you for your prompt attention to this matter.

Respectfully


Rocque Merritt



Tax # 173159000



Legend

- Building Footprints
- Taxlots
- ImageOrtho**
 - Red: Band_1
 - Green: Band_2
 - Blue: Band_3
- Roads**
 - ImageOrtho**
 - Red: Band_1
 - Green: Band_2
 - Blue: Band_3
 - ImageBestRes**
 - Red: Band_1
 - Green: Band_2
 - Blue: Band_3
- County Outline**
- Highway**
 - Interstate
 - State Route
 - Interstate Ramp
 - State Ramp
- Arterial**
- Collector**
- Minor**

Notes:

Green Mountain, Merrit

1: 9,594



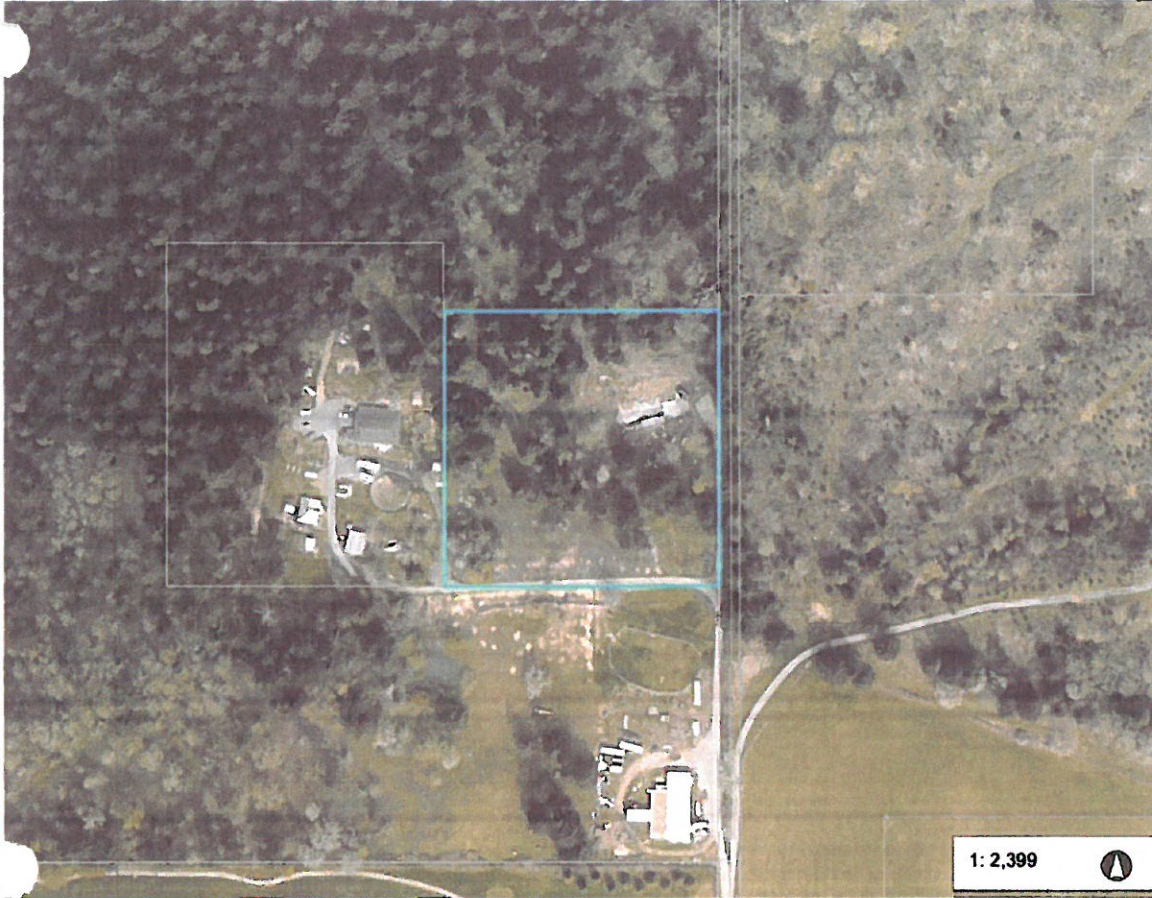
1,599.0 0 799.50 1,599.0 Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA GIS - <http://gis.clark.wa.gov>

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.



Tax # 173185000



Legend

- Building Footprints
- Taxlots
- ImageOrtho**
 - Red: Band_1
 - Green: Band_2
 - Blue: Band_3
- Roads**
 - ImageOrtho**
 - Red: Band_1
 - Green: Band_2
 - Blue: Band_3
 - ImageBestRes**
 - Red: Band_1
 - Green: Band_2
 - Blue: Band_3
- County Outline**
- Highway**
 - Interstate
 - State Route
 - Interstate Ramp
 - State Ramp
- Arterial**
- Collector**
 - Minor

Notes:

Green Mountain, Merrit

1: 2,399

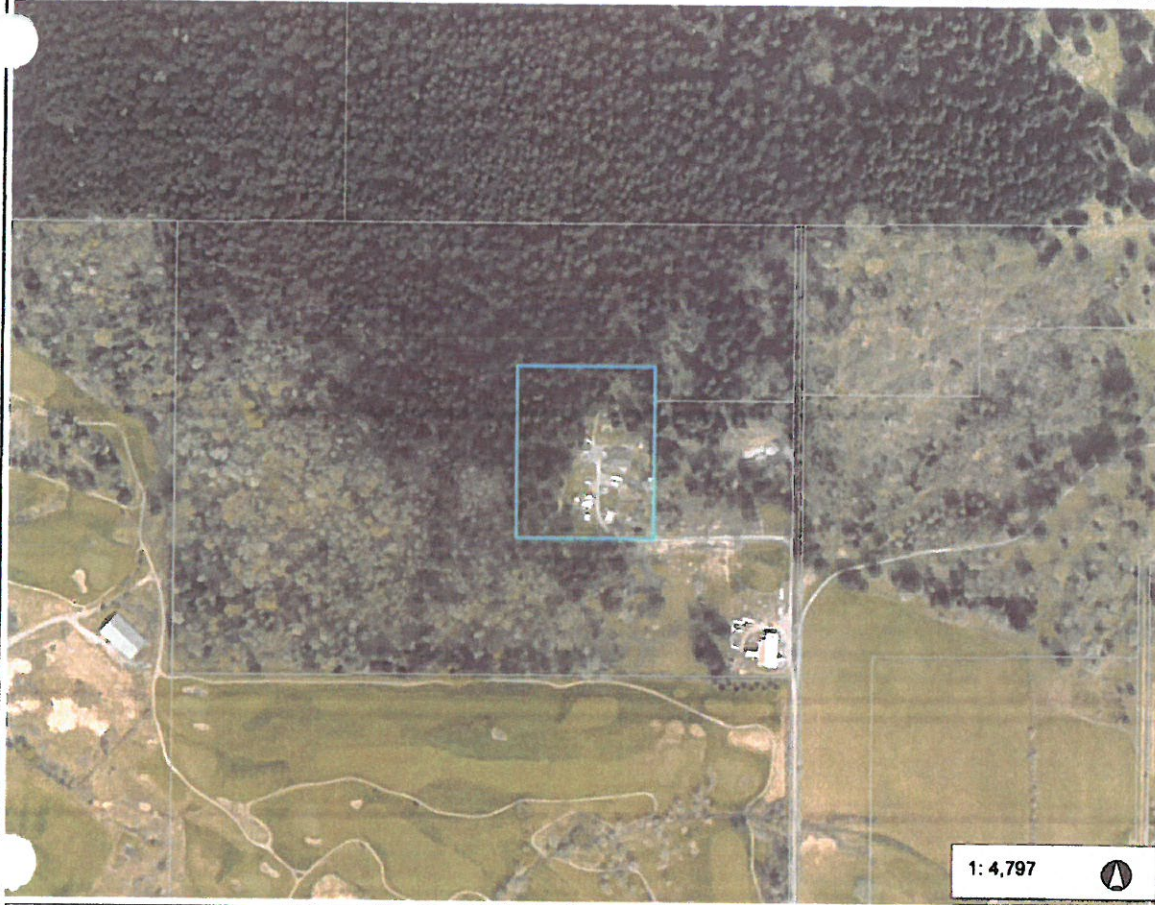
399.8 0 199.88 399.8 Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, WA GIS - <http://gis.clark.wa.gov>

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.



Tax # 173191000



Legend

- Building Footprints
- Taxlots
- ImageOrtho**
 - Red Band_1
 - Green Band_2
 - Blue Band_3
- Roads**
 - Red Band_1
 - Green Band_2
 - Blue Band_3
 - Red Band_1
 - Green Band_2
 - Blue Band_3
- County Outline**
- Highway**
 - Interstate
 - State Route
 - Interstate Ramp
 - State Ramp
- Arterial**
- Collector**
 - Minor

Notes:

Green Mountain,
Memt

1: 4,797



799.5 0 399.75 799.5 Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
Clark County, VA GIS - <http://gis.clark.va.gov>

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.

O'Donnell, Mary Beth



CP16#0209

From: Orjiako, Oliver
Sent: Tuesday, August 05, 2014 4:36 PM
To: O'Donnell, Mary Beth
Subject: FW: WWGMHB, US Supreme Court and Washington State Court decisions - For the public record

Follow Up Flag: Follow up
Flag Status: Flagged

For index! Thanks.

From: Cook, Christine
Sent: Tuesday, August 05, 2014 10:49 AM
To: Orjiako, Oliver; Euler, Gordon; Alvarez, Jose
Subject: FW: WWGMHB, US Supreme Court and Washington State Court decisions - For the public record

From: LaRocque, Linnea **On Behalf Of** Barnes, Ed
Sent: Tuesday, August 05, 2014 10:47 AM
To: Cook, Christine
Subject: FW: WWGMHB, US Supreme Court and Washington State Court decisions - For the public record

Carol, (on behalf of Comm. Barnes)
this is the latest email Carol had send this morning and was noted by Comm. Barnes in the hearing. Comm. Barnes had asked Carol to send to you, she may send along, but you have it now too.
Linnea

From: Carol Levanen [<mailto:cnldental@yahoo.com>]
Sent: Tuesday, August 05, 2014 12:17 AM
To: Madore, David; Mielke, Tom; Barnes, Ed; Carol Levanen; Susan Rasmussen; Leah Higgins; Rick Dunning; Rita Dietrich; Jerry Olson; Fred Pickering; Jim Malinowski; Frank White; Benjamin Moss; Lonnie Moss; Melinda Zamora; Nick Redinger; Curt Massie; Marcus Becker; Clark County Citizens United Inc.
Subject: WWGMHB, US Supreme Court and Washington State Court decisions - For the public record

This information is being submitted into the record by Clark County Citizens United, Inc.

Western Washington Growth Management Hearings Board
Washington State Courts - United States Supreme Court
1994-2010

Note* The following information is discussions and rulings of the WWGMHB and the courts. Consider each of these items as in quotations, which are taken from the reports.

United State Supreme Court

The United States Supreme Court has explained that the primary purpose of the "takings clause" in the Constitution is to "bar government from forcing some people alone to bear public burdens, which in all fairness and justice, should be borne by the public as a whole". In the case of King County, when they imposed limits, and claimed the new ordinance was necessary to better protect critical areas, including promoting healthy watersheds and protecting salmon, it was clearly a public use.

1. that population projections and allocations....are not solely for use in urban areas, and 2. that the population projections for urban areas plus the population projections for no-urban areas must total the population projection for the entire county....Based on this view of the law and facts, the board ruled that the GMA precluded 5 acre lots in rural areas, and it ordered the county to "increase the minimum lot sizes" in such areas.

The GMA requires the county to consider OFM population projections when sizing urban growth areas. Nothing in the GMA provides that a county must use OFM's population projections for any other purpose. More particularly, nothing in the GMA provides that a county must use OFM's population as a cap or ceiling when planning non-urban growth.....

The implications are 1. that the legislature considered how OFM's projections should be used; 2. that the legislature decided to require that counties use OFM's projections when planning for urban growth; and 3. that the legislature decided *not* to require that counties use OFM's projections when planning for non-urban growth.

Based on the foregoing we conclude that the GMA does not require counties to use

Page 3 of 10

OFM's projections as a cap on non-urban growth. The board exceeded its authority and the trial court did not err by reversing the Board's ruling.

Redmond v. GMHB 136Wn.2d at 38 (1998) (Redmond)

Redmond was accepted by the court specifically to clarify the definition of "Agriculture land" The court noted that the statutory definition of agricultural lands found at RCW 36.70A 030 (2) involves the concepts of both "primarily devoted to" and "long term commercial significance". Long term commercial significance is further defined at RCW 36.70A. 030 (10) p. 54. The court held under the statutory definition of that term a local government "must evaluate growing capacity, productivity, and soil composition, proximity to population areas, and the possibility of more intensive uses of the land in question.....

Washington State Supreme Court (PFL report 1-10-2010) Gold Star Resorts, Inc. v. Futurewise
Futurewise petitioned the growth management hearings boards....to force Whatcom County to adopt a uniform low density limit - no more than one dwelling per five acres - in the county's rural areas. Agreeing with the property owners, the Supreme Court unanimously held that, under its own precedents, state growth boards may not force counties to impose one size fits all, "bright" line density limits.

Washington State Court of Appeals

- unanimous decision that the states' GMA does not require the county's uncompensated restrictions on landowners use of their property.

The court held that the county's "set aside" rule violates a state law

prohibiting a "tax, fee or charge" on land use. This prohibition "applies to ordinances that may require developers to set aside land as a condition of development". None of the limited exceptions in the law apply, the court noted.

No one was compensated and no one was relieved from paying taxes on the portion of their property rendered useless....there was no evidence that the set-aside restrictions were necessary to protect the environment, health or safety of the community.

Other Court Actions

....counties must do more than simply catalog land that are physically suited to farming. They must consider development prospects. ("the possibility of more intense uses") and determine if land has the enduring commercial quality needed to fit the agricultural land definition.

12-23-2004

- the superior court affirmed "the definition of long term significance refers to the growing capacity and productivity of the soil.

Page 4 of 10

If the county sought "to serve the farmers non-farm economic needs" (opening Br at 30) Serving the farmers "non-farm" economic needs is not a logistical or permissible consideration in designating

GOALS

3.

There is no requirement in the Act that the county show how it will balance the GMA goals in every comprehensive plan amendment; instead, the burden is on petitioners to show that the county's action is not in compliance. **Hood Canal et al. v Jefferson County 03-2-0006 (FDO 8-15-03)**

GMA PLANNING

4. Under the GMA, a county has an affirmative duty to disperse as much accurate information to as many people as it possibly can. Simply providing access does not satisfy that duty.

Mudge v Lewis County 01-2-0010 c (FDO 7-10-01)

5. The Board recognizes too, that the county is not obligated to add to the stock of low income housing but instead to set the framework in which the market can provide housing for all segments of the population. **Campbell v San Juan County Case # 09-2-0104 (FDO at 14 (Jan. 27, 2010))**

HOUSING

6. In order to implement this goal (RCW 36.70A.020 (4)), cities and counties are directed to do the necessary planning to perform an inventory and analysis of existing and
Page 6 of 10

projected needs, make adequate provisions for the needs of all economic segments of the community, and identify sufficient land for low income housing

Campbell v San Juan County Case # 09-2-0104 FDO at 15 (Jan. 27, 2010)

LAND CAPACITY ANALYSIS

(as to historic or ancient lots) ICAN fails to acknowledge that even legally created lots are not developable if substandard. (ICAN's) argument reveals a distinction between a legal lot and a developable lot. In general a "legal lot" is any lot that was created by legal means. (IE. subdivision, testamentary devise, boundary adjustment) A "buildable" or "developable" lot is one that meets the zoning and health code requirements. In Dykstra (Dykstra v. Skagit County) the court noted that a legal lot may still be a non-conforming substandard lot because its land is insufficient to be a buildable site and that the legal lot status does not confer development rights. Here the county properly based its holding capacity analysis upon developable lots ICAN v **Jefferson County Case consideration at 6-7 (Sept. 11, 2009)**

.....RCW 36.70A 110 (2) also allows that "an urban growth area determination may include a reasonable land market supply factor" The Board read this to mean that while the county can provide for additional land over and above what the county's land capacity analysis says it actually needs to provide for sufficient land to accommodate its projected population, the use of a market factor is not required.....while a market factor is a useful tool in ensuring adequate land supply over the 20 year life of the plan, it is not required.....**Coordinative case: Lubwig, et al v San Juan County Case # 05-2-0019c (and others) Order on Compliance at 26-27 (Jan. 30, 2009)**

A Land Capacity Analysis' (LCA) is a requirement arising from RCW 36.70A 110 for all counties planning under GMA.....The LCA is a critical mechanism for the sizing of a UGA because it is utilized to determine how much urban land is needed.....

Friends of Skagit County, et al v Skagit County Case # 07-2-0025c (Order on Reconsideration June 18, 2008) at 15

.....This is primarily because RCW 36.70A 110 goes to the establishment of an urban growth boundary and the ability of the area within the boundary to accommodate the allocated growth and to provide for urban facilities and services. areas.....In other words, the emphasis and focus as to capacity applies to the urban growth. The Board does not find that RCW 36.70A 115 mandates the same type of analysis for rural areas.

Dry Creek Coalition v Clallam County Case # 02-2-0033 Final Decision Order at 11 (June 12, 2009)

LIMITED AREAS OF MORE INTENSIVE DEVELOPMENT (LAMIRDS)

.....the county has not violated the GMA by failing to adopt parameters that define the

Page 7 of 10

The use of an urban reserve area without defined standards of conversion to a UGA, in conjunction with a large market factor, did not comply with the GMA Achen,

Clark County Citizens United, Inc v Clark County 95-2-0067 (FDO 9-20-95)

MINIMUM GUIDELINES

The GMA does not dictate the use of a five tier classification system for waters of the state. 1000 Friends of Washington...v Skagit County 03-2-0017 (FDO 2-10-04)

NATURAL RESOURCE LANDS - IN GENERAL

Allowance of a 10 acre minimum lot size within agriculture RLs, with the associated possibility of 1du/per 5 acre densities in some areas as part of a clustering program,

Page 9 of 10

complies with and does not substantially interfere with the goals of the Act.

Butler v. Lewis County 99-2-0027c (FDO 6-30-00)

Current use

in RL areas is not a determinative factor of the appropriateness of an RL designation. **Friday Harbor v San Juan County 99-2-0010c (R01-31-01)**

The use of an urban reserve areas instead of designation of the land as RL for planning for the post 2012 period did not comply with the GMA

If the land is RL, it must be designated and conserved until a proper analysis demonstrates a needed different designation **Achen v Clark County 95-2-0067 (Compliance Order, 10-1-96)**

The GMHB does have the authority to require aggregation of non-conforming lots. Achen v. Clark County 95-2-0067 (R011-20-96)

PUBLIC FACILITIES AND SERVICES

Compliance of the Act is achieved where a county develops LOS standards for rural and urban water services and precludes urban services into rural areas. **Evergreen v Skagit County 00-2-0046c (FDO, 26-01)**

Western Washington Growth Management Hearings Board - Compliance Order

Clark County Citizens United, Inc, Achen et al. v. Clark County #95-2-0067 (Poyfair Remand)

CCNRC's contention that 80% of the county was suitable for forest designation is simply too broad a sweep.

Final Order and Decision - page 17

Long Term Commercial Significance - CCCU and many of the individual petitioners contended that much of the agricultural resource land classified and designated by Clark County did not meet the definition of "long term commercial significance". Much of the support cited by petitioners for that contention came from a report (Ex 181) issued by the Farm Focus Group. This group was a subcommittee of the Resource Lands Citizens Advisory Committee. It issued a report that agree with the criteria used for initial agricultural land designations. However, a minority of the committee concluded that the commercially significant criterion could not be met in Clark County.

The 1980 Clark County comprehensive plan provided for "clustering" of residential development on resource land as long as approximately three fourths of the land remained for resource use. The record reveals that many different suggestions and recommendations were made as to appropriate minimum lot sizes for rural areas. The FSEIS alternative A involved 2 1/2 min lot size. Much public comment recommended

1 acre minimums.

Vacant Lands Analysis - In the assumption phase of the VLA the county used a market factor of 25% for residential areas and 50% for commercial and industrial areas.

Page 10 of 10

The gorge Commission has the authority to establish densities at that location. One residence for every 2 acres is the maximum allowed. Obviously, 1 du/2 acres is not an urban density. Until that density is changed, the GMA does not allow Clark County to impose an urban growth area there since it is not, nor could it be, urban.

Card to Board
Orjiako
Orjennell

Rec'd 8/12/14
Public Comment

Clark County Board of Commissioners
P. O. Box 5000
Vancouver, Washington 98666

August 11, 2014



Re: 2007 Comprehensive Land Use Maps and the Rural Economy - For the

CP16#0212

Clark County Citizens United, Inc. is concerned for the economic future of rural Clark County and strongly suggest a small increase of developable lots on agriculture and forest land to maintain the rural economy. Non-conforming lots and county ordinances have reduced options for many long term citizens at a detriment to maintaining their important family farms, as they pay increased tax revenue. Statistics show that new construction in Fire District 3 has high value for the local tax system per capita, with very little new services required. Rural land values increase while there is less individual cost and more value to the community. Rural housing invests in the community and asks very little in return. Existing infrastructure as additional public costs cannot be counted, when the property tax value far outweighs multi-housing options on a per person, per year basis.

The USDA Economic Research Service has a series of data maps that give important information for land use planning. These maps indicate that the percent of sales less than \$10,000 for farms in Clark County in 2007 was 85.4% and 40% of the farmers worked off the farm. The population change rate and net migration rate for 2000 to 2010 was 10 to 25% and the density per square mile was 10,000 to 69,468, similar to King county. The natural population change rate from 2000 to 2010 was 8 to 26% Where is Clark County going to put the people? The largest increase of migration, according to the BERK study was in the rural lands and historically the ratio has been a 80/20 split.

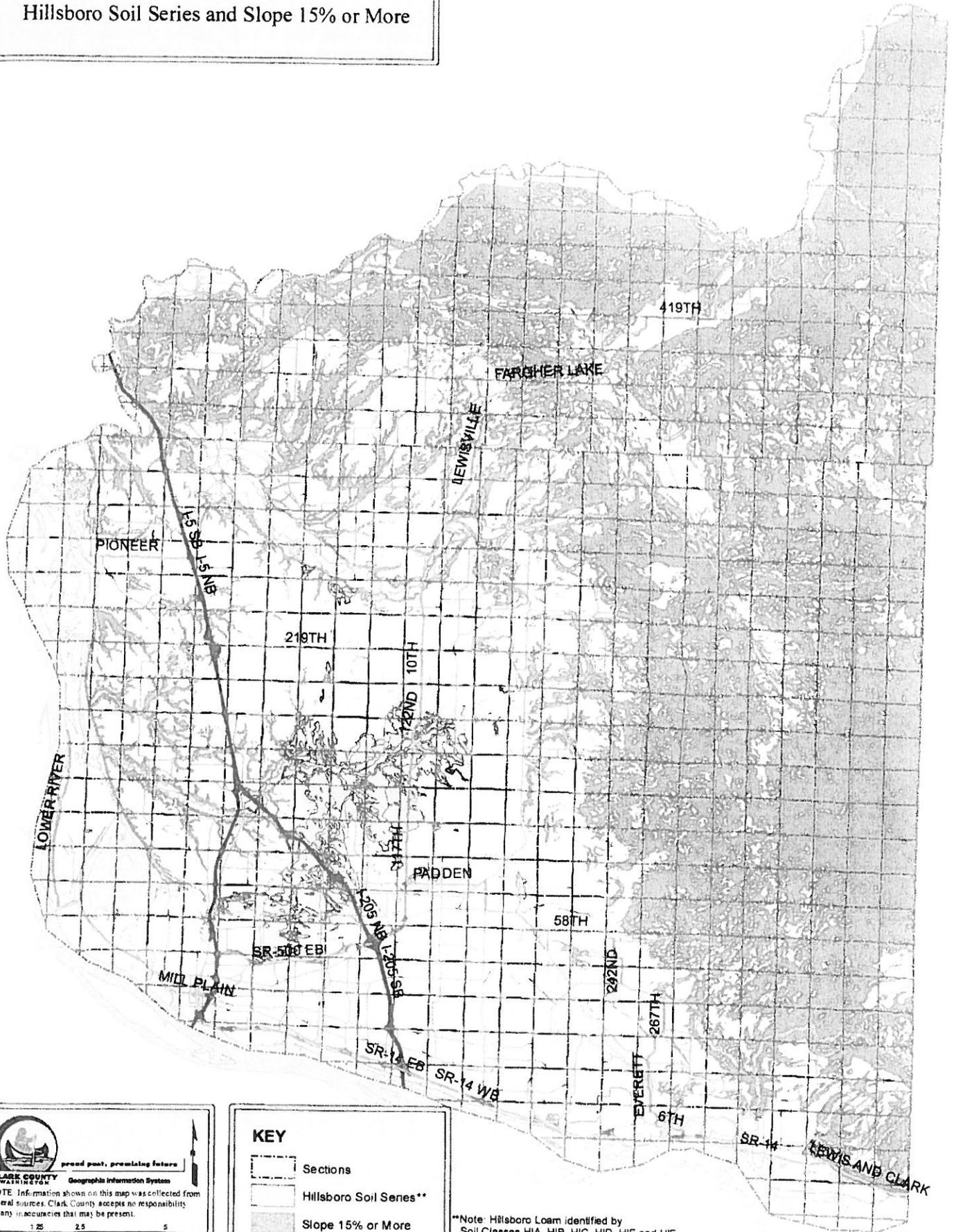
According to USDA, The County Classification in 2013 for Clark County was Metro, with an Urban Influence Code of large Metro. This indicates that Clark County is an urban county, not a rural county. There was 0 to 4% employed in agriculture, 8-13% in manufacturing, 51-55% in services and 5-6% in government. Unemployment was 8.8 to 11.2%. The per capita income in 2008 to 2012 was \$25,000 to \$30,000. Good paying jobs need to be increased in all areas of the county, both urban and rural.

If you compare these numbers with designated resource lands in Clark County, it demonstrates that a major change needs to be made to the rural areas to compensate for these figures. But first the erroneous resource land maps need to be corrected and a true reflection of rural Clark County needs to be made. The current 2007 maps indicate that agricultural land is in the same location as forest land. Hillsboro Loam and Cinebar Loam cannot be in the same location at the same time. Clark County's maps indicate prime forest Class I-II and prime Agriculture Class I-II in areas where there are none. The maps look alike with just the colors changed. This is not a true reflection of resource lands according to the Soils of Clark County Manual. Changes and corrections need to be made because the economic future of rural Clark County depends on it.

Carol Levanen, Ex. Secretary
Clark County Citizens United, Inc.
P.O. Box 2188, Battle Ground, Washington 98666

Clark County, Washington

Hillsboro Soil Series and Slope 15% or More






CLARK COUNTY
WASHINGTON
Geographic Information System

NOTE: Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.

0 1.25 2.5 5 Miles

Map of Clark County, Washington, showing Hillsboro Soil Series and Slope 15% or More. The map is a topographic map with a grid overlay. The grid lines are labeled with section numbers and place names. The map shows the distribution of Hillsboro Soil Series and areas with slopes of 15% or more. Major roads and geographical features are also labeled.


KEY

-  Sections
-  Hillsboro Soil Series**
-  Slope 15% or More

**Note: Hillsboro Loam identified by Soil Classes H1A, H1B, H1C, H1D, H1E and H1F

Clark County, Washington

Cinebar Soil Series and Slope 25% or More







CLARK COUNTY
Washington
Geographic Information System

NOTE: Information shown on this map was collected from several sources. Clark County accepts no responsibility for any inaccuracies that may be present.

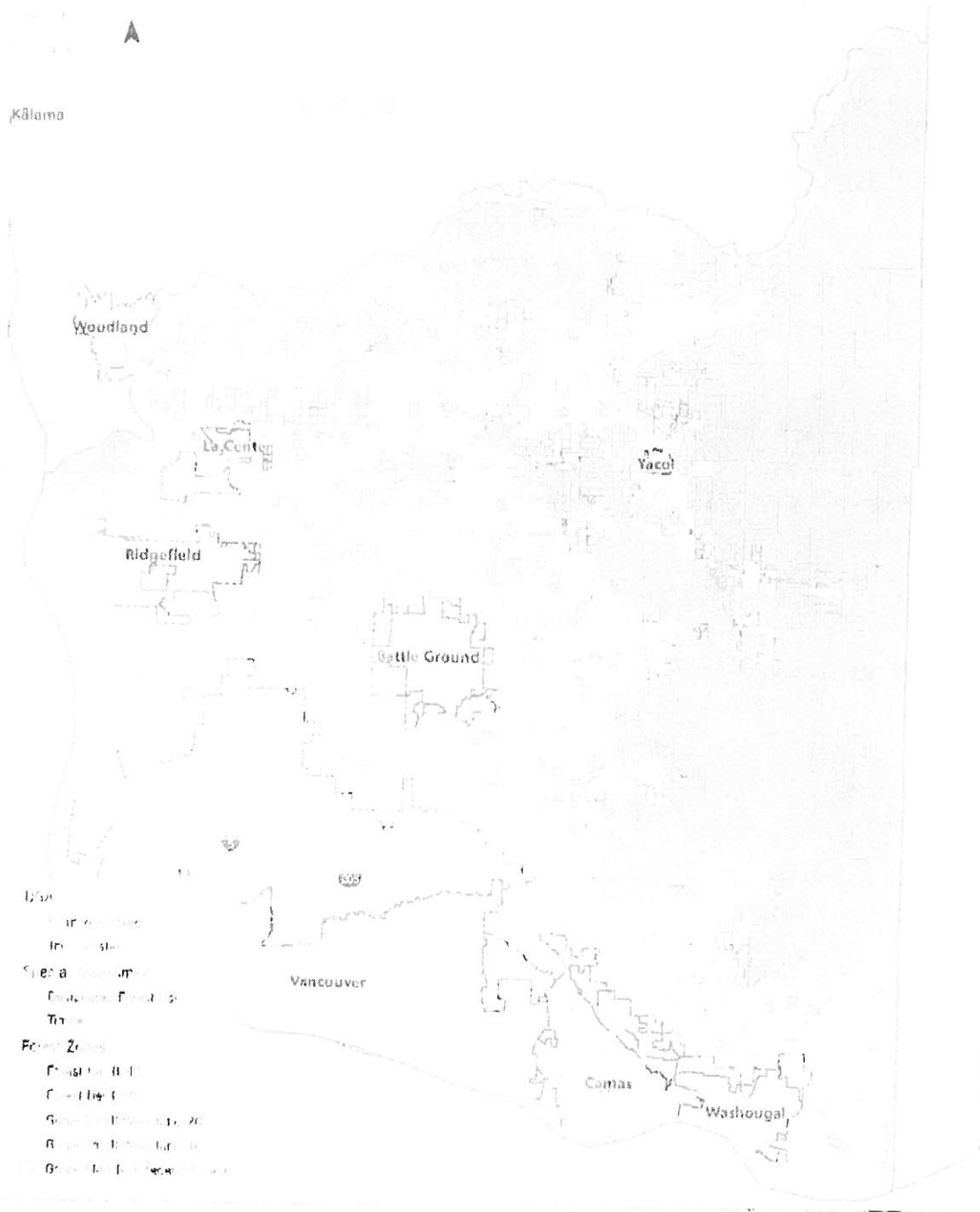
0 1.25 2.5 5 Miles

KEY

-  Sections
-  Cinebar Soil Series**
-  Slope 25% or More

**Note: Cinebar Loam identified by Soil Classes CnB, CnD, CnE, and CnG

Exhibit 22 Location of Clark County Timberlands



Source: Clark County Assessor, 2011; BERK, 2012.

The Payfair Remand

CASES & CODES PRACTICE MANAGEMENT JOBS & CAREERS LEGAL NEWS BLOGS SERVICE PROVIDERS SEARCH FindLaw

Forms Law Technology Lawyer Marketing Corporate Counsel Law Students JusticeMail Newsletters

Concepts of both primarily devoted to, & long-term commercial significance

Decided 3/12/1999

CLARK COUNTY NATURAL RESOURCES COUNCIL CERES RCCPA v. CLARK COUNTY CITIZENS UNITED INC

CLARK COUNTY NATURAL RESOURCES COUNCIL CERES RCCPA v. CLARK COUNTY CITIZENS UNITED INC

FindLaw Career Center

- Attorney
- Corporate Counsel
- Academic
- Judicial Clerk
- Summer Associate
- Intern
- Law Librarian
- Paralegal
- Legal Secretary
- Law Enforcement
- District Attorney
- Legal Investigator
- Compliance Officer
- Investment Banker
- Business Development

Font size:

Court of Appeals of Washington, Division 2.

CLARK COUNTY NATURAL RESOURCES COUNCIL, Vancouver Audubon Society, Coalition for Environmental Responsibility and Economic Sustainability (CERES), Rural Clark County Preservation Association (RCCPA) and Loo-wit Group Sierra Club, Appellants, v. CLARK COUNTY CITIZENS UNITED, INC., Respondents.

No. 22164-1-II.

Decided: March 12, 1999

John S. Karpinski, Vancouver, Jennifer Jean Peet, Portland, OR, for Appellants. Glenn J. Amster, Linda B. Clapham, Lane Powell Spears Lubersky, Seattle, for Respondents. John Tayloe Washburn, Richard L. Settle, Foster, Pepper & Shefelman, Seattle, Richard Steven Lowry, Clark County Deputy Pros. Atty., Richard T. Howsley, Randall Bryan Printz, Williams, Kastner & Gibbs, Vancouver, for Defendants. Stephen Harold G. Overstreet, General Counsel-Building Industry Ass'n of Wash., Olympia, for Amicus Curiae Building Industry of Washington.

The Clark County Natural Resources appeals a superior court determination that the Growth Management Act does not empower the Western Washington Growth Management Board to order a county to use as a cap on non-urban growth, population projections made by the Office of Financial Management. We affirm.

The Growth Management Act (GMA) is codified as RCW 36.70A. It was enacted in 1990. It applies in many but not all counties.

A county subject to the GMA is required to adopt county-wide planning policies, development regulations and, in most cases, a comprehensive plan. Such a county must designate urban growth areas, as well as agricultural lands, forest lands, mineral resource lands, and critical areas. By operation of law, such a county designates as "rural" any land "not designated for urban growth, agriculture, forest, or mineral resources."

When designating urban growth areas, a county must include land densities "sufficient to permit the urban growth that is projected to occur in the county for the succeeding twenty-year period." In doing this, a

county must consider "the growth management population projection made for the county by the office of financial management [OFM]." OFM makes its projection pursuant to RCW 43.62.035.

Having designated urban growth areas, a county may not allow urban growth outside those areas. "Urban" growth is "growth that makes intensive use of land for the location of buildings, structures, and impermeable surfaces to such a degree as to be incompatible with the primary use of land for the production of food, other agricultural products, or fiber, or the extraction of mineral resources, rural uses, rural development, and natural resource lands."

Notwithstanding the designation of urban growth areas, a county may allow non-urban or "rural" growth outside those areas. "Non-urban" or "rural" growth encompasses "a variety of uses and residential densities, including clustered residential development," provided that such uses and densities are "not characterized by urban growth," and are "consistent with rural character."

"encompasses a variety of uses e.g. residential densities including clustered residential development"
"consistent w/ rural character"

Clark County is subject to the GMA. It has about 500,000 acres, many of which are urban or suburban in character. In December 1994, it adopted a comprehensive plan that designated about 83,500 acres as rural. The plan stated "that all rural lands would have a minimum lot size of 5 acres."

Numerous parties appealed the plan to the Western Washington Growth Management Board ("the Board"), including the Clark County Natural Resources Council (CCNRC) and Clark County Citizens United, Inc. (CCCU). CCNRC sought stricter controls on land use, while CCCU sought less strict controls on land use.

In September 1995, after weeks of hearings, the Board ruled, among other things, that Clark County's plan did not adequately restrict rural growth. Legally, the Board rested its ruling on two premises allegedly drawn from the GMA: (1) that population projections and allocations are not solely for use in urban areas, and (2) that the population projections for urban areas plus the population projections for non-urban areas must total the population projection for the entire county. Factually, the Board observed (1) "that the County allocated 15,000 of the population projection number for non-urban growth;" (2) that the County had "an excess of 13,500 preexisting undeveloped tax lots;" and (3) that the County had based its planning on an average of 2.33 persons per household. As a result, according to the Board, "there would be more than twice the number of lots available to house the allocated 15,000 population projection, even without additional divisions of land that would likely occur over the next 20 years." Based on this view of the law and facts, the Board ruled that the GMA precluded 5-acre lots in rural areas, and it ordered the County to "increase the minimum lot sizes" in such areas.

CCCU appealed to the Clark County Superior Court, which reversed the Board's order. The court ruled that the GMA did not require the County to use OFM's population projections as a fixed cap on non-urban growth, and that the Board had exceeded its authority by creating and imposing such a cap on the County.

GMA doesn't require the county to use OFM's pop. projections as a fixed cap on rural growth

CCNRC now appeals to this court. Its primary contention is that the trial court "erroneously concluded OFM population projections are not a restraint/cap on rural growth." This contention involves a question of law that we review without deference to the trial court, but arguably with deference to the Board. According to CCCU, the question is whether "the GMA requires [that] the OFM population projections be used as the defining element in establishing land use densities in rural areas." In simpler terms, the question is whether the GMA requires a county to use OFM's population projections as a cap on non-urban growth.

The GMA requires a county to consider OFM population projections when sizing urban growth areas. Thus, RCW 36.70A.110 provides in pertinent part:

- (1) Each county that is required or chooses to plan under RCW 36.70A.040 shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.
- (2) Based upon the growth management population projection made for the county by the office of financial management, the county and each city within the county shall include areas and densities sufficient to permit the urban growth that is projected to occur in the county or city for the succeeding twenty-year period.

Nothing in the GMA provides that a county must use OFM's population projections for any other purpose. More particularly, nothing in the GMA provides that a county must use OFM's population projections as a cap or ceiling when planning for non-urban growth. Construed according to its plain meaning, then, the GMA does not require counties to use OFM's population projections as a cap or ceiling on non-urban growth.

Attempting to forestall a holding based on the GMA's plain meaning, CCNRC argues that "the conclusion that the OFM population projection is a hard cap not to be exceeded is supported by a review of the Growth Management Act ('GMA') as a whole." It is our view, however, that such a review tends to detract from, not support, CCNRC's position. As already observed, the GMA requires counties to use OFM's projections when planning for urban growth. It omits any reference to counties using OFM's projections when planning for non-urban growth. The implications are (1) that the legislature considered how OFM's projections should be used; (2) that the legislature decided to require that counties use OFM's projections when planning for urban growth; and (3) that the legislature decided not to require that counties use OFM's projections when planning for non-urban growth.

CCNRC argues that the trial court was required to defer to the Board's interpretation of the GMA, and that this court must also. Although a court will defer to an agency's interpretation when that will help the court achieve a proper understanding of the statute, "it is ultimately for the court to determine the purpose and meaning of statutes, even when the court's interpretation is contrary to that of the agency charged with carrying out the law." Here, in our view, the Board misread the statute and exceeded its authority. If we were to defer to its ruling, we would perpetuate, not correct, its error. Under these circumstances, we hold that deference is not due.

Based on the foregoing, we conclude that the GMA does not require counties to use OFM's projections as a cap on non-urban growth. The Board exceeded its authority, and the trial court did not err by reversing the Board's ruling.

Affirmed.

FOOTNOTES

1. See RCW 36.70A.040(1), (2).
2. RCW 36.70A.040(3).
3. RCW 36.70A.040(3)(c); RCW 36.70A.110(1).
4. RCW 36.70A.040(3)(b); RCW 36.70A.170(1); RCW 36.70A.030(2), (5), (8), (11), (17), (18), (19), (20). In 1994, subsections 17-20 were numbered 14-17, respectively.
5. RCW 36.70A.070(5).
6. RCW 36.70A.110(2); see RCW 43.62.035.
7. RCW 36.70A.110(2).
8. RCW 36.70A.110(1); RCW 36.70A.010(1), (2).
9. RCW 36.70A.030(17). In 1994, this subsection was numbered 14 rather than 17.
10. RCW 36.70A.110(1) ("Each county that is required or chooses to plan under RCW 36.70A.040 shall designate an urban growth area or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature.").
11. RCW 36.70A.030(15). We use this subsection as a present indicator of legislative intent, even though it was not enacted until 1997. See Wash. Laws 1997, ch. 429, § 3.

6. RCW 36.70A.070(5)(b), as amended in 1997. In 1994, the GMA allowed “uses that are compatible with the rural character of such lands,” and “a variety of rural densities.” Former RCW 36.70A.070(5); Wash. Laws 1990, ch. 17, § 7.

7. Clerk's Papers at 38.

8. The Board also made many other holdings that we are not asked to review.

9. Clerk's Papers at 39-40.

10. Clerk's Papers at 79.

11. The superior court said in part: It is evident the rural land use density regulations were driven in part by earlier Growth Management Hearing Board decisions requiring urban population plus rural population to equal Office of Financial Management population forecasts. [Citation omitted.] This formulaic view of the GMA requirement is fatally flawed. There is no requirement in the GMA that the OFM projections be used in any manner other than as a measure to ensure urban growth areas are adequately sized and infrastructure in those growth areas is provided for. The Board's requirement to, in essence, require a vacant buildable lands analysis for the rural area was erroneous. This Board decision, however, compelled the County to downzone substantial portions of the rural areas in order to meet the Board's apparent requirements. Clerk's Papers at 739-740.

12. Appellant's Brief at ii.

13. *City of Pasco v. Public Employment Relations Comm'n*, 119 Wash.2d 504, 507, 833 P.2d 381 (1992) (construction of statute is question of law).

14. *City of Redmond v. Central Puget Sound Growth Management Hearings Board*, 136 Wash.2d 38, 46, 959 P.2d 1091 (1998). In other words, we review the trial court's ruling “de novo.”

15. We discuss due deference to the Board later in this opinion.

16. Respondent's Brief at 22.

17. Without so holding, we assume that the GMA permits a county to use OFM's population projections when planning for lands outside its urban growth areas. That question is not presented by this appeal.

18. Appellant's Brief at 19.

19. *Snohomish County v. Anderson*, 123 Wash.2d 151, 157, 868 P.2d 116 (1994), quoting *Washington Natural Gas Co. v. PUD 1*, 77 Wash.2d 94, 98, 459 P.2d 633 (1969) (“Where a statute specifically designates the things or classes of things upon which it operates, an inference arises in law that all things or classes of things omitted from it were intentionally omitted by the legislature”); *Bour v. Johnson*, 122 Wash.2d 829, 836, 864 P.2d 380 (1993); *State v. Roadhs*, 71 Wash.2d 705, 707, 430 P.2d 586 (1967).

20. *City of Redmond*, 136 Wash.2d at 46, 959 P.2d 1091; *City of Pasco*, 119 Wash.2d at 507, 833 P.2d 381; *Cowiche Canyon Conservancy v. Bosley*, 118 Wash.2d 801, 813-14, 828 P.2d 549 (1992); *Overton v. Economic Assistance Auth.*, 96 Wash.2d 552, 555, 637 P.2d 652 (1981).

21. *Overton*, 96 Wash.2d at 555, 637 P.2d 652 (citation omitted); see also *Cowiche*, 118 Wash.2d at 815, 828 P.2d 549.

MORGAN, J.

BRIDGEWATER, C.J., and REYNOLDS, J.P.T., concur.

McCall, Marilee



CP16#0218

From: NoReply@Clark.Wa.Gov
Sent: Thursday, August 14, 2014 10:45 AM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Transportation

Comments:

Transportation planning shouldn't be a 20 year plan. Growth is faster than planning and becomes outmotivated and traffic congestion increase at more raipd rate. Bus service needs be increased on SR 502 from Battle Ground Day,Swing shifts, Ridgefied industrial District Day,Swing,Grave shifts on the I-5 Freeway North and South Bound

Submitted by:
Dale Chambers

Email: chambersdale@yahoo.com

Address:
22715 N.E. St. Helens View Road
Yacolt, Washington

McCall, Marilee



From: NoReply@Clark.Wa.Gov
Sent: Friday, August 15, 2014 8:43 AM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

CP16#0220

Following comments were submitted online:

Parcel No: 11825500

Subject: Growth in Clark Co.

Comments:

Clark county WAS a great place to live. Now not so much. The problems as I see them are:
Too many apartments. We need to stop building them or price them so that lower income people can't afford them. If the less desirable are priced out, they will leave or at least stop moving into the county. Less undesirables, less problems.
Encourage and allow larger lot sizes. Livability starts in ones home and neighborhood not by squeezing people together.

Submitted by:
Bill Ungrodt

Email: bsungrodt@hotmail.com

Address:

Salmon Creek ,

O'Donnell, Mary Beth



From: Alvarez, Jose
Sent: Monday, August 18, 2014 4:56 PM
To: 'Engineer Assistant'
Cc: Euler, Gordon; O'Donnell, Mary Beth
Subject: RE: Ridgefield property RV Park use allowance

Follow Up Flag: Follow up
Flag Status: Completed

Mallory,

Thank you. I've received the letter and will pass it on to the Board of County Commissioners and will also include it in the record for the Comprehensive Plan Update.

Jose Alvarez
Planner III
Clark County
Department of Community Planning
360.397.2280 x4898

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

From: Engineer Assistant [<mailto:ea@deltamanagementco.com>]
Sent: Monday, August 18, 2014 10:41 AM
To: Alvarez, Jose
Subject: Ridgefield property RV Park use allowance

Good Morning Jose,

Wanted to ensure you received a copy of the letter we submitted on Friday. Please let me know if the Board needs anything from us. I look forward to hearing from you.

Thanks again,

Mallory Lewis
Delta Management Co
203 E. Reserve Street
Vancouver WA, 98661
t. 360-696-4448 EXT 1020
f. 360-695-1970

Delta Management Co., LLC

203 E Reserve Street, Vancouver WA 98661 ph. 360-696-4448 fax 360-695-1970

August 8, 2014

Board of Commissioners
1300 Franklin St
Vancouver WA 98661

ORIGINAL
Rec'd 8/14

Re: RV Park use allowance as part of the Comprehensive Plan Review
Parcel ID 182153000

This letter is to formally request the Board of Community Planning to amend the use table to include an RV Park in the "IL" designated zone located at 16606 NE 10th Ave., Ridgefield, WA 98642 (Parcel ID 182153000) adjacent to the Clark County Fairgrounds. This piece of property is owned by Castle Tree Trust, one of the *Sadri family entities*, and contains 5 acres of level and buildable land which currently sits undeveloped and is an eyesore to the passersby along I5.

The proposed development would consist of approximately 100 RV spaces and amenities that include:

- *An onsite management office*
- *An onsite recreational facility*
- *Free WiFi and Cable access*
- *Onsite laundry facilities*
- *Onsite shower facilities*
- *All facilities in compliance with ADA standards*
- *Security cameras*
- *Well maintained landscaping*
- *Dog park*
- *Swimming pool (per planning feasibility)*



Kianoosh Keyvani
Project Manager / Planner

203 E Reserve Street
Vancouver, WA 98661
kiakeyvani@gmail.com

Cell: (360) 619-2977
Office: (360) 696-4448
Fax: (360) 695-1970

All these amenities aid in our goal to provide excellent customer service while maintaining an average of 95% occupancy in our existing RV parks during the traveling seasons and over 80% occupancy during the off seasons. With over forty years of experience in property development and twenty years of experience owning and managing local RV Parks, we are confident that this development will thrive and be as successful as our other locations. We are proposing an attractive developed property that not only markets itself but also would *enhance the surrounding economic community* by increasing the customer base to local farmers, grocery stores, and local and small businesses. The development would also allow for street frontage improvements along 10th Street.

This use will be a great benefit to the local community by targeting *tourists*. The property could be easily marketed with the park located such a *short distance* from the Portland and Vancouver metropolitan areas and *direct access* to and from Interstate 5. With the Property bordering the Fairgrounds, the use would generate an *increase in patrons* to the Clark County Fair and Amphitheater attractions by offering a place for traveling consumers, outside of Clark County, to park, stay and enjoy several days of

Delta Management Co., LLC

203 E Reserve Street, Vancouver WA 98661 ph. 360-696-4448 fax 360-695-1970

attractions. An RV Park near such a growing and exciting event center would offer a *convenience* to larger, traveling events and vendors.

Should the Board allow for the amendment, Clark County as a whole would see an economically *positive impact*. Not only would the park *generate revenue* for the Clark County Fairgrounds and Amphitheater, but also the difference in *property tax*, once developed, would be a substantially significant increase payable directly to Clark County. The County would also benefit from the rise in *taxed sales* of local goods and merchandise in this area. It is also likely that this development, once established, would *encourage other developers* to invest in the area and possibly develop or improve the surrounding neighborhoods.

We take a great deal of pride in our properties, with a management office onsite and the use of security cameras, we would be promoting a safe environment for the park and surrounding areas. While providing a safe atmosphere, the park would also encourage an overall well-being in our on-site recreational facilities. Again, this development would serve to benefit Clark County in increased tax revenues as well as an increase in consumers for the surrounding businesses, agriculture, and the Amphitheater and Fairgrounds. Thank you for your time and attention to this matter. We look forward to hearing from you.

Respectfully,



Asghar R. Sadri
Trustee of Castle Tree Trust

References:

The following developed RV parks, owned by Sadri Family entities, are as examples of our proposed development for this property (also see aerial photos on Exhibit A)

Columbia River RV Park : Consists of 11.5 acres and 198 RV spaces
10649 NE 13th Ave.
Portland, OR 97211

VanMall RV Park : Consists of 3.85 acres and 101 RV spaces
10400 NE 53rd Ave.
Vancouver, WA 98662

Attachments:

Exhibit A – Aerial Photos

Exhibit A

Columbia RV Park – Photo 1



Columbia RV Park – Photo 2

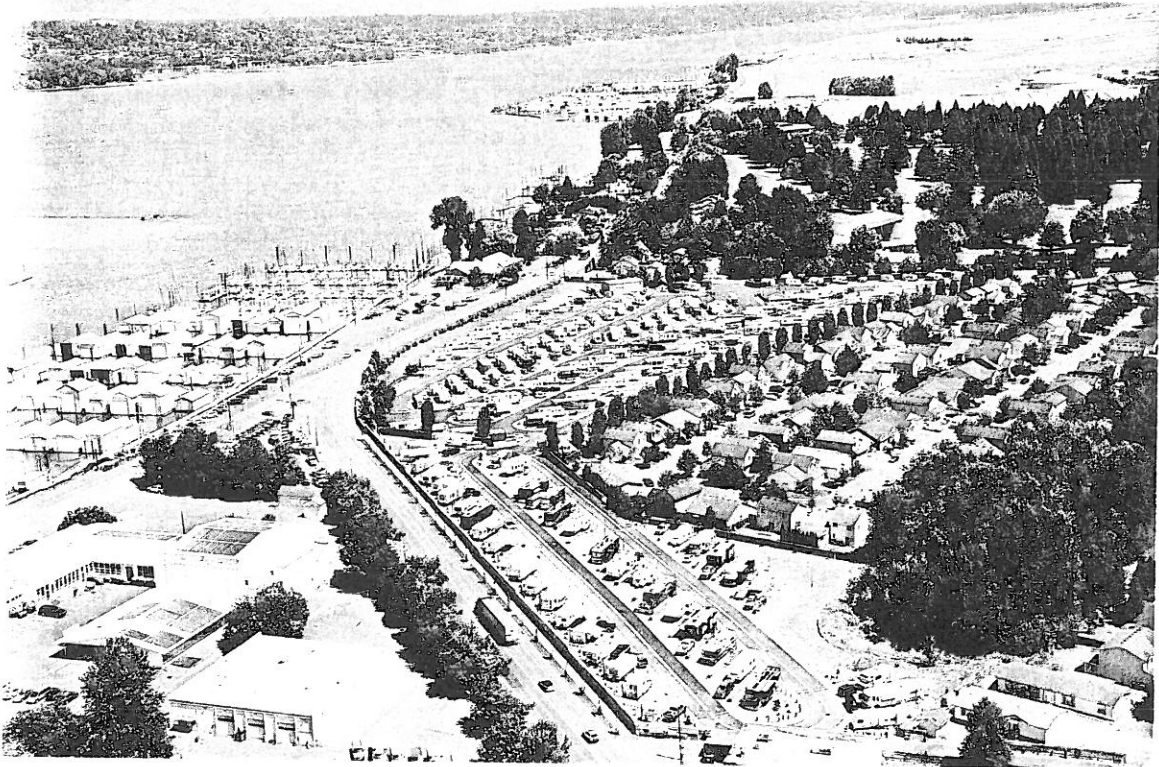


Exhibit A

Columbia RV Park – Photo 3

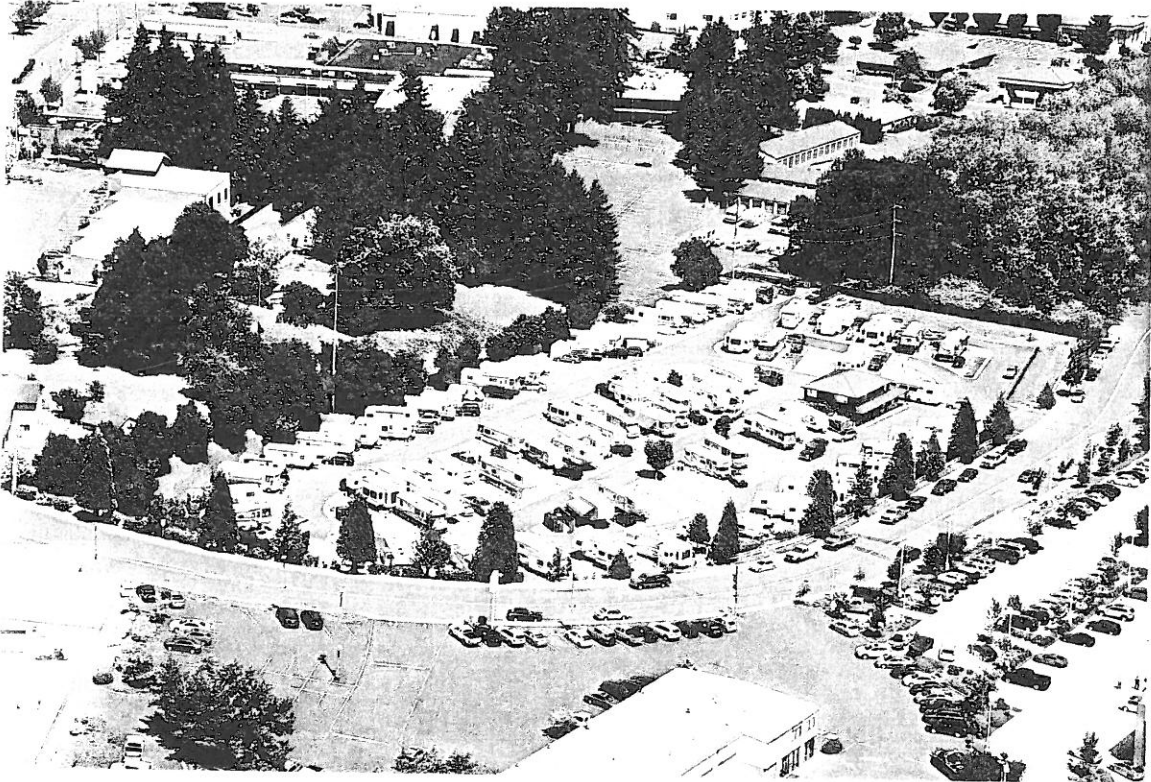


Columbia RV Park – Photo 4



Exhibit A

VanMall RV Park – Photo 1



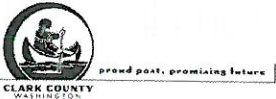
VanMall RV Park – Photo 2



08-19-14
Open House Comment



CP16#0223



EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Gretchen Stanke (Friends of Clark County)

Address: 308 NE 124th Ave, Vancouver, WA 98684

Open house location: Vancouver Community Library, Aug 19

Comment:

1) There should be more alternatives - I suggest you look at reduction of urban growth areas in some cases - what would be the implications? (I know such an alternative would not be adopted, but it should be looked at.)

2) An alternative that promotes working open spaces.

Elements that should be looked at:

1) water, clean & abundant; 2) stormwater & stormwater pollution; 3) wetlands, even small ones help deal with stormwater;

4) wildlife & fish; 5) natural areas, in general; 6) wild fires & the urban-wildland interface; 7) hazardous areas including steep slopes & floodways; 8) agriculture & ag & forest soils; 9) transportation including walking, (over)

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: gstanke@pacifier.com

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.

08-20-14

Open House Comment



CP16#0224

Next 20 Years – STARTING NOW

East Clark County – Vancouver, Camas, Washougal

1. New 192nd Ave. Bridge – Will do what I-205 Bridge has done for growth in East Clark County. Jobs, Jobs, Jobs – East of 192nd Ave. and North Clark County. – Business, Housing, & Retail. Put Light Rail on I-205 as it was built for Light Rail, north to Vancouver Mall. Also East & West along NE 18th St Power Lines from Downtown Washougal to Downtown Vancouver. Bring Portland workers & jobs to Clark County.
2. Thousands of homes both sides of Lacamas Lake. Thousands of Jobs – Technology, Manufacturing, & retail along Lake Rd. & North of Lacamas Lake & out into Brush Prairie and Hockinson.
3. Without 192nd Ave Bridge – Growth East will slow & access to Portland will become a Gridlock & limit growth & Jobs due to excess car traffic on Both existing 2 Bridges. We need to support & HELP get this bridge built in the 5 years as in 5 years traffic will already be growing rapidly.
4. With all Companies locating in East Clark County, they will need Housing, Shopping, entertainment, & Roads and Infrastructure. If this is provided more companies will come. In addition to Companies already here & coming soon. So our Kids will have Jobs here. Not in Portland or Seattle.
5. With 125,560 residents and 91,200 Jobs coming, How will they all fit across 2 existing bridges already near capacity, without an East County Bridge at 192nd Ave? THIS IS COMING by or before year 2035. Stop fighting & do your jobs of Planning & Growing Forward.

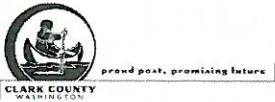
ADAM KLUKA

AKLUKA © BHHSTW.COM

08-20-14
Open House Comment



CP16# 0225



EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Susan Rasmussen for Clark County Citizens United, Inc

Address: La Center

Open house location: Camas

Comment:

- The county needs to be brought into compliance with the findings of fact and conclusions of law - Case # 96-2-00080-2

- No legal criteria was used to re-designate agri-forest lands. The agri-forest lands never have been discussed in an EIS - 36,000 acres.

- The EIS was absent the analysis of changes to the pattern of rural development; this was clearly erroneous." per Judge Payfair

- County's rural development regulations were inconsistent with the GMA. The county's resource development regulations were inconsistent with the GMA. The county's resource development regulations are inconsistent with the GMA." per Judge Payfair

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: "It was erroneous for the county to give little regard for the realities of existing rural development"

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

"The county needs to be brought into compliance. The zoning needs to properly and accurately reflect what is actually on the ground regarding parcelization."

Susan Rasmussen

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping. We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.

O'Donnell, Mary Beth



CP 16 # 0226

From: Tilton, Rebecca
Sent: Wednesday, August 20, 2014 10:07 AM
To: Barnes, Ed; Madore, David; Mielke, Tom; Orjiako, Oliver; O'Donnell, Mary Beth
Subject: Comp Plan Update: related Public Testimony (BOCC Hearing of Aug. 19)
Attachments: Carol Levanen_08-19-14.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Hello,

For your information, and for the record, here's a copy of Carol Levanan's testimony from the Board hearing of August 19.

Rebecca

Clark County Board of Commissioners
P.O. Box 5000
Vancouver, Washington 98666

Re: Rural Lands and the 2016 Comprehensive Plan Update

In the Superior Court of Washington, Case No. 96-2-0080-2, Clark County Citizens United, Inc. v Western Washington Growth Management Hearings Board, and Clark County, Honorable Edwin J. Poyfair ruled in favor of Clark County Citizens United, Inc.. He states, the WWGMHB was not above the law, the Agriforest resource designations violate the GMA, the failure to solicit meaningful public input...violated the public participation provisions of the GMA, and the Comprehensive Plan EIS issued by the county violates the State Environmental Policy Act. But most importantly, he ruled that There is no requirement in the GMA that the OFM projections be used in any manner other than as a measure to ensure urban growth areas are adequately sized and infrastructure in those growth areas is provided for. Even more important he ruled that The Board's interpretation was erroneous, and the County's decision to follow the Board lead was unfortunate. The result is a plan that gives little regard for the realities of existing rural development in direct contradiction of the term of the GMA.

Clark County Citizens United, inc. is very concerned that rural lands are not included in the first open house meetings of the Comprehensive Plan update for 2016. After 20 years this plan has become obsolete. The massive downzoning and theft of the rural lands, by way of zoning and regulations, continues. In 2007 CCCU, Inc. would not be heard by the county because they were told that only urban changes were being made and rural was not being considered. But, the GMA did not intend that when a county designates a 20 year plan, that it should stay static throughout the rural areas for tens of years. There are thousands of legal substandard lots in rural Clark County that may have lost their vesting rights because of the inactions of Clark County. The cost to the landowners is in the millions. It has been 20 years now, and the county must address this problem and this court ruling by the Superior Court.

CCCU, Inc. urges Clark County to include a full review of the rural lands in this current 2016 review, correct the erroneous resource maps and incorrect zoning of the rural lands and honor the Superior Court ruling.

Sincerely,



Carol Levanen, Ex. Secretary
Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604

McCall, Marilee



CP16#0227

From: NoReply@Clark.Wa.Gov
Sent: Saturday, August 23, 2014 6:47 AM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Agriculture

Comments:

The plan should address preservation of agricultural resource lands to provide local sources of wholesome food and provide ground water recharge and wildlife habitat. Land available for a range of farm sizes is needed. Agricultural resource land in the western half of the county should be prioritized because of its soil quality and water availability. Small to medium owner operated farms could provide a significant source of quality employment. Opportunity for comment is inadequate.

Submitted by:
James Hunter

Email: huntersgreens@spiritone.com

Address:
15716 N.E. 112th Avenue

McCall, Marilee



CP16# 0228

From: NoReply@Clark.Wa.Gov
Sent: Saturday, August 23, 2014 10:20 AM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Farm Land Preservation

Comments:

The plan should address preservation of agricultural resource lands to provide local sources of healthy food and provide ground water recharge and wildlife habitat. Each week I depend on the nourishing produce grown by these small to medium farmers in Vancouver. Land available for a range of farm sizes is needed. Farm land in the western half of the county should be prioritized due to its soil quality and water availability. Small to medium owner operated farms also provide jobs.

Submitted by:
Kim Zentner

Email: kimzen13@live.com

Address:

Vancouver, Wa

McCall, Marilee



CP16#0229

From: NoReply@Clark.Wa.Gov
Sent: Saturday, August 23, 2014 1:35 PM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Agricultural resource lands

Comments:

I feel strongly, that land that can be used to grow food for people in this area must be preserved! Transportation is expensive-this makes food grown nearby an important part of keeping the population healthy. KEEP Local community gardens; community supported agriculture land; and private garden spaces! Family gardens provide food for individual

Submitted by:

Sylvia Fish

Email: sylviamermaid@msn.com

Address:

21210 NW 31st Ave
Ridgefield, Washington

McCall, Marilee



CP16#0230

From: NoReply@Clark.Wa.Gov
Sent: Saturday, August 23, 2014 3:52 PM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No: CSA Farms

Subject: Agricultural Land

Comments:

We receive produce weekly from a Certified Sustainable Farmer in Battle Ground, and think it is important to allow this activity. It provides healthy, local food and jobs.

Submitted by:
Carolee and Gil Ornelas

Email: carolee.ornelas@gmail.com

Address:
18115 se 18th St.
Vancouver, WA.

McCall, Marilee



CP16 #0231

From: NoReply@Clark.Wa.Gov
Sent: Monday, August 25, 2014 7:15 PM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Save Farm Land

Comments:

The plan should address preservation of agricultural resource lands to provide local sources of wholesome food and provide ground water recharge and wildlife habitat. Land available for a range of farm sizes is needed. Agricultural resource land in the western half of the county should be prioritized because of its soil quality and water availability. Small to medium owner operated farms could provide a significant source of quality employment. Opportunity for comment is inadequate.

Submitted by:
Sarah Collmer

Email: sicollmer@gmail.com

Address:
704 W 20th St.
Vancouver, Washington

McCall, Marilee



From: NoReply@Clark.Wa.Gov
Sent: Tuesday, August 26, 2014 8:21 AM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

CP16#0232

Following comments were submitted online:

Parcel No:

Subject: Preserve farmland

Comments:

I'm not well versed in the decisions that go into planning for an entire community's growth. However, I do very much value the agricultural heritage of the region. I'm a member for a local CSA and find access to fresh, local food important. I want to make my wishes know to preserve farmland under both the "agricultural resource lands" designation and the "current use taxation program". Thank you.

Submitted by:

Misty Murphy

Email: misty@castlemurphy.com

Address:

McCall, Marilee



CP16#0233

From: NoReply@Clark.Wa.Gov
Sent: Tuesday, August 26, 2014 4:50 PM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: agriculture

Comments:

I am a farmer. As you update the growth plan, please reserve large areas for agriculture. Development has destroyed some of the best farmland in the world, paving over rich deep alluvial topsoil. When soil is strong, less (if any) chemicals are needed. The flatlands have the best soil for row crops, not the hills where the soil is more suited to orchards. Once built over, it is lost to farming. Many people realize our area needs to produce its own food. Please preserve Clark County's great soil.

Submitted by:
Jacqueline Freeman

Email: j88@sisna.com

Address:
20309 NE 242nd Ave
Battle Ground, Washington

McCall, Marilee



CP16#0234

From: NoReply@Clark.Wa.Gov
Sent: Tuesday, August 26, 2014 9:02 PM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Agriculture

Comments:

Please consider the importance of agriculture or small ag parcels, habitat conservation and open space within developed/developing areas.

Submitted by:

Kristine White

Email: gaiafaith@yahoo.com

Address:

21906 NE 227th Ave

BATTLE GROUND, WASHINGTON

McCall, Marilee



CP 16 # 0235

From: SCOTT <cramers11@msn.com>
Sent: Thursday, August 28, 2014 9:47 AM
To: Cnty 2016 Comp Plan
Subject: Urban Growth Buandry Review

To whom it may concern,

My apologies, but I'm unable to make your public meeting.

For the record:

I strongly support and would respectfully ask that my property be taken into the urban growth boundary. The property is currently zoned R-10 in urban reserve and is very close to the current boundary. I know it will be sometime (years) before it is reviewed again. Bottom-line: I'm getting on in the years and would like to leave each of my children (4) a piece of land, which, per your planning department, I'm unable to do unless it falls into the boundary. Thank you very much for your consideration. If you have questions I can be reached at the number below.

Sincerely,

Scott W. Cramer
60-574-5899

Property location:

6217 NE Salmon Creek Street
Vancouver, Washington 98685



CP16#0236

2 PAGES
W/5 PAGE ATTACHMENT

McCall, Marilee

From: Tweet <tweetfamily@comcast.net>
Sent: Friday, August 29, 2014 3:33 PM
To: Cnty 2016 Comp Plan
Subject: Comprehensive growth management plan update
Attachments: 201104MTPPopEmploy.pdf

The growth rates being used to plan for transportation in Clark County appear to be unrealistic, leading to costly planning errors and promoting "high capacity" transit in spite of low capacity usage of the transit system over the last 2 decades. Please adjust the growth rates to better reflect the actual conditions in Clark County. Regional Transportation Plans will better serve businesses and residents if they are more accurate.

Margaret Tweet

From: "Tweet, margaret" <tweetfamily@comcast.net>
To: "Lookingbill, Dean" <dean.lookingbill@rtc.wa.gov>

Sent: Thursday, October 4, 2012 11:04:21 AM
Subject: Fwd: 2011 Metro. Transportation Plan Update: 2035 population and employment forecast memorandum dated March 29, 2011

Dear Mr. Lookingbill.

At the March 2011 RTC meeting, there was discussion about adjusting the population and employment rates used to predict future transportation demand, as per the attached document.

Questions: what is the population growth rate used for the following, the DEIS? FEIS? the 2030 plan? the 2035 Plan?

What is the jobs ratio used for the DEIS? FEIS? the 2030 Plan or the 2035 Plan.

The light rail/BRT proposal appears based on the 2035 predictions. Is it?

Please clarify, was the DEIS/FEIS based on the 2030 plan?

The increased jobs to household ratio of 1.03 for the 2035 plan is considerably higher than the current rate of .82.

Why did you recommend using this higher jobs to household ratio?

Thank you for any clarification you can provide.

Margaret Tweet

From: "Dean Lookingbill" <dean.lookingbill@rtc.wa.gov>
To: "Tweet" <tweetfamily@comcast.net>

Cc: "diane workman" <diane.workman@rtc.wa.gov>

Sent: Tuesday, June 12, 2012 9:45:45 AM

Subject: RE: 2011 Metro. Transportation Plan Update: 2035 population and employment forecast memorandum dated March 29, 2011

Ms. Tweet,

In response to your e-mail requests of 6/8/12 and 6/11/12 please note the following. Attached is the March 29, 2011 RTC Board memo on the 2035 population and employment forecast used for the 2035 Clark County Metropolitan Transportation Plan. There have been no updates to the to the plan or 2035 population and employment forecast since that time. The jobs to household ratio is stated in the memo.

Here is the web link to the OFM population projections, their methodology is explained on the web site. <http://www.ofm.wa.gov/pop/gma/projections12/projections12.asp>

Here are two web links to the Employment Security Department, their assumptions and methodology are explained on their web site. <https://fortress.wa.gov/esd/employmentdata/reports-publications/industry-reports/employment-projections>

<https://fortress.wa.gov/esd/employmentdata/reports-publications/regional-reports/county-profiles/clark-county-profile>

Dean Lookingbill

RTC Transportation Director

**MEMORANDUM**

TO: Southwest Washington Regional Transportation Council Board of Directors
FROM: Dean Lookingbill, Transportation Director
DATE: March 29, 2011
SUBJECT: **2011 Metropolitan Transportation Plan Update: 2035 Population and Employment Forecast**

AT A GLANCE – Action Requested

The RTC Board is being asked to take action on the adoption of the 2011 MTP 2035 population and employment forecast. The proposed 2035 forecast includes the feedback from the Board at their March 1, 2011 meeting, as well as a follow up review by the technical staff of RTC member jurisdictions. The forecast is consistent with the adopted 2007 GMA Plan, while extending the forecast year from 2024 to 2035. The 2035 population forecast of 641,800 is in between the OFM medium and high projection. The forecast also takes into account the current economic recession that has slowed growth in Clark County over the last several years. The 2035 employment projection of 256,200 is consistent with the adopted 2007 GMA Plan by maintaining a 1.03 jobs to household ratio. The 2035 employment forecast is less than the previous 2030 MTP employment forecast, however, the jobs to household ratio of 1.03 is considerably higher than the current ratio of .82 jobs to household.

INTRODUCTION

As the Board will recall, the long-range Metropolitan Transportation Plan (MTP) is a part of the required federal and state transportation planning process and represents the collective strategy for developing a regional transportation system to provide both mobility and accessibility for person trips and freight movement. The 2011 MTP update is needed in order to meet the federal requirements that Regional Transportation Plans must be updated at least every four years. The MTP must also address a 20-year planning horizon for the life of the Plan which requires RTC to adopt the year 2035 as the Plan's forecast year.

The 2035 population and employment forecast and its geographic allocation reflects and quantifies the adopted future land-use conditions for 2011 MTP Update. The forecast and allocation serve as major inputs to RTC's regional travel forecasting model that in turn produces a forecast of future travel demand. In developing the 2011 MTP update, travel demand model outputs will be used in conjunction with adopted MTP goals and policies, existing local and state transportation plans and updated financial information to assess future transportation needs and compare the performance of long-range planning strategies and options. Additionally, the model will support the project development processes for WSDOT, local jurisdictions and C-TRAN by providing a county-wide comprehensive, regional forecast of travel demand. The 2035 forecast year is consistent with the required 20-year planning horizon for the environmental impact

statements for roadway projects as well as transit projects like C-TRANs upcoming Alternatives Analysis for the proposed Fourth Plain Bus Rapid Transit project.

The purpose of this agenda item is to present the feedback that the RTC Board requested from the Regional Transportation Advisory Committee (RTAC) on the proposed 2035 forecast and to seek the adoption of the proposed county-wide 2035 population of 641,800 and employment forecast of 256,200 for use in the 2011 MTP Update.

DEVELOPMENT PROCESS FOR THE 2011 MTP DEMOGRAPHIC FORECAST

During the development of a new 2035 population and employment forecast, RTC has collaborated extensively with the long-range planning staff of partner agencies in reviewing current population and employment forecasts produced by the State of Washington and considering region-wide econometric assumptions developed by Metro. RTC staff, local jurisdiction staff and RTAC have continued to use the following principles to guide the development of the proposed 2035 forecast.

- Maintain consistency with adopted Comprehensive Growth Management plans and current land use designations
- Incorporate official state population forecasts from the Office of Financial Management (OFM)
- Consider long-term industry employment projections from the Employment Security Department (ESD)
- Account for the impacts of the recent economic recession
- Consider region-wide econometric assumptions developed by Metro
- Use the adopted MTP 2030 forecast and allocation as the starting point

Following the feedback from the RTC Board at their March meeting, RTC staff met with the long-range planning staff from Clark County, the City of Vancouver and all of RTAC members to discuss the comments from the RTC Board and to review the previously RTAC recommended forecast. The following two sections provide a summary of RTAC member's responses to the Board comments and their recommended 2035 population and employment forecast.

PROPOSED 2035 POPULATION AND EMPLOYMENT FORECAST

RTC staff met with the local jurisdiction long-range planning staff on March 4th to discuss and review the previously RTAC recommended forecast and Board's comments. Their review of available population forecasts concluded that the current state OFM medium projection trend (see attached graph) provides the best predictive forecast for county-wide population and that using a population forecast that falls between the OFM medium and high projection trends will provide sufficient mitigation against the risk of under-planning, while maintaining consistency with the Comprehensive Growth Management Plan. It was also noted that the new population

forecast should account for the lower than expected growth that has occurred since the adoption of the comprehensive plan. They also concluded that a future job per household ratio of 1.03 sets an aggressive employment growth target that is consistent with the policy goals of the comprehensive plan and represents significant growth over the current job per household ratio of 0.82.

At the March 18th RTAC meeting, RTAC members agreed that a 2035 population of 641,800 and employment forecast of 256,200 is consistent with the adopted Comprehensive Growth Management Plan and presents little risk for under-planning for transportation needs. RTAC members stated that over-forecasting can dilute focus of planning efforts and cause the region to allocate scarce funds to transportation needs that may not materialize during the plan's timeframe. RTAC also expressed that the county will begin the process to update the Comprehensive Growth Management Plan in few years, providing the opportunity to comprehensively address growth in the county and not solely through the lens of transportation.

RTAC recommends the RTC Board adopt a 2035 population forecast of 641,800 because of the following:

- It falls between the OFM high and medium projections to minimize risk of under-planning, like the GMA forecast for 2024.
- It represents the growth trend of the GMA that has been adjusted to reflect lower than expected population growth as shown by the 2010 census.
- It maintains consistency with the adopted Comprehensive Growth Management Plan.

RTAC recommends the RTC Board adopt a 2035 employment forecast of 265,200 because of the following:

- It is consistent with Comprehensive Growth Management Plan policy to capture a greater share of regional employment growth in order to allow for increased opportunity to work and live within Clark County.
- Raising the county's current job to household ratio from 0.82 to 1.03 is an aggressive growth target that adds over 5,000 new jobs per year and doubles the county's 2010 employment.

Planning staff from Clark County and the City of Vancouver will be in attendance at the April RTC Board meeting to address questions and comments from the Board regarding RTAC's forecast recommendation.

NEXT STEPS

Maintaining consistency with adopted comprehensive plans is one the main principles guiding RTC and RTAC members in the process of developing a 2035 forecast of population and employment for the MTP update. The RTAC forecast recommendation begins with the planning

policies of the Comprehensive Growth Management Plan; adds the most recent population projections from OFM; and accounts for the recent impacts to the county's growth using observed data from the 2010 Census.

Upon the adoption of a 2035 population and employment forecast by the RTC Board, RTC staff will continue to work closely with its member jurisdictions to generate an allocation of the forecast to the 665 transportation analysis zones (TAZs) that represent Clark County. The main focus of the growth allocation effort will be maintaining consistency with adopted comprehensive plans and current zoning. Towards that end, RTAC has recommended the following approach to allocate the 2035 population and employment forecast:

- Begin with the 2030 TAZ allocation for the 2007 MTP
- Remove households and employment from land that has been remanded from urban growth areas (UGAs) since the 2007 adoption of the Comprehensive Growth Management Plan
- Remove households and employment that were added to urban reserve areas when allocating 2024 to 2030 population and employment growth for the 2007 MTP
- Review and modify planning-level overrides to redevelopment areas within UGAs
- Allocate remaining households and employment within designated urban reserves

This approach will maintain consistency with adopted land-use plans while providing a demographic forecast and allocation that extends 11 years beyond the 2024 horizon year of Comprehensive Growth Management Plan.

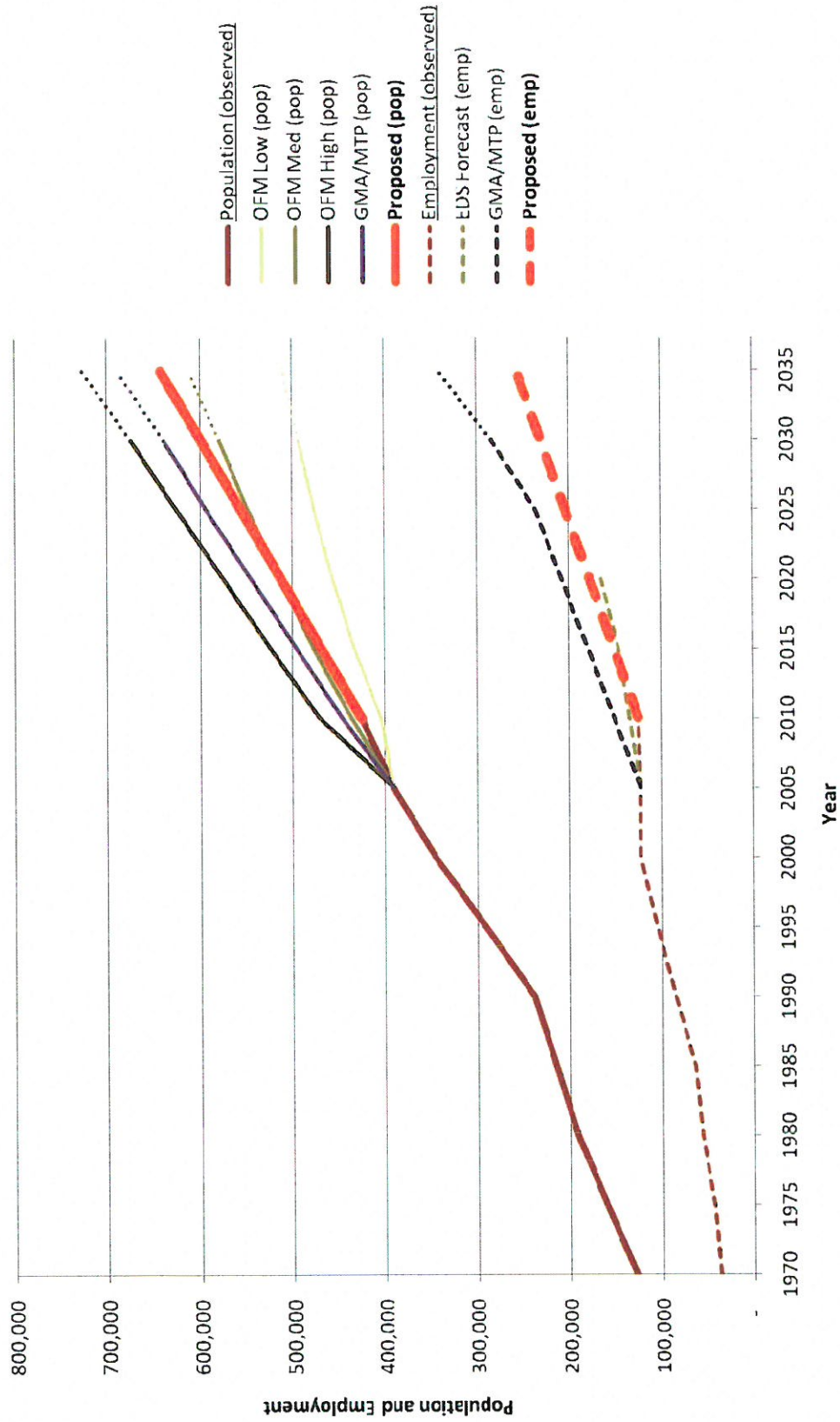
ACTION REQUESTED

The RTC Board is being requested to adopt a county-wide 2035 forecast of population and employment for the 2011 MTP. The proposed 2035 population forecast is 641,800 and the employment forecast is 256,200. The 2035 forecast will provide one of the major inputs to RTC's regional travel forecasting model which in turn provides the 2035 travel demand forecast. The output of the travel forecasting model will be used along with adopted MTP goals and policies, existing local and state transportation plans and new financial information to assess the future transportation needs to be recommended in the MTP.

Attachment

20110405RTCB_MTPpop&EmpMemo.doc

Clark County Population and Employment - History and Forecast (1970 to 2035) -



McCall, Marilee



CP16#0231

From: Susan Setterberg <smsetterberg@yahoo.com>
Sent: Saturday, August 30, 2014 8:22 PM
To: Cnty 2016 Comp Plan
Subject: Comments on 2016 comp plan update

After attending the open house in Ridgefield on August 17th, I have the following comments on the update plan.

Light Rail: As a new resident of Clark County, I am surprised at the seeming lack of support for light rail; however, when I've talked to county residents about it, I get a different response in favor of some kind of light rail. Having lived on the outskirts of four major metropolitan areas during my work career of 31+ years, I have found public transportation in the form of a light rail in three of those four areas to be an excellent way for both speed and cost to get into a city for work and for entertainment. It is inconceivable to me that Clark County would not participate in a light rail project that would connect to the Portland metro area system and provide ease of movement within the county. Traffic coming in and out of Portland at commute times is almost unbearable now. What would it be like in five or ten more years? I've heard opponents blame Portland but I wonder if any of those folks have been in the traffic and counted the license plates creeping by. I have. Easily, 60% of the cars creeping through the I-5 corridor are from WA. So, take some responsibility, look to the future, and make a plan that includes light rail as a transportation alternative. It will never get cheaper; traffic will only get worse.

Code Changes for Park lands: I understand that a number of park lands created in residential areas after the fact are still designated as residential rather than being reclassified as parks. This change should happen to protect the parks so the neighborhoods will not lose their parks for which they have worked so hard when developers seek to turn them into residential or commercial use.

Wildlife Habitat: There needs to be greater consideration of habitat quality and variety for wildlife in Clark County. Having a plan for recreational parks and relying on the few refuges is not sufficient. Quality habitat needs to be diverse and large enough to **sustain diverse wildlife** populations. There have been numerous studies and reports on forest fragmentation and wildlife corridors which should be considered when designating open space intended for wildlife and connecting those areas. Putting a treed path or grass ditch behind a development and designating it a green belt does not mean it will adequately support birds and other animals. The needs of a variety of species native to the area need to be studied and considered. Rivers, creeks, meadows, farm land, forests, grasslands, wetlands, etc. can all be a part of making Clark County a wonderful place to live when they are full of wildlife.

Susan M. Setterberg
Ridgefield, WA
smsetterberg@yahoo.com

McCall, Marilee



CP16 #0238

From: Karen Wood <kwood@pacifier.com>
Sent: Sunday, August 31, 2014 4:43 PM
To: Cnty 2016 Comp Plan
Subject: EIS Scoping Comments

At the August 19 open house, I was very interested in the local food production material. I would like to see conservation of food production land included in the scope of the 2016 Comprehensive Plan Update. With even national grocery store chains touting their "local" food, it is clear that more people appreciate locally grown food. I purchase most of my produce at Joe's Place Farm and New Seasons Market, and I would like to see more food produced locally in Clark County. Of the many benefits, it would be good for our local economy to have more of our food produced nearby. Since the urban growth boundaries are not likely to change, this update seems like a good opportunity to study ways to encourage local food production and include them in the update. I was happy to learn that the urban growth boundaries are not likely to change due to the recession and being made so large in the 2007 update. I'm also happy to see the county has chosen to use the medium population growth forecast and the high employment forecast to hopefully move Clark County away from being a bedroom community and relief valve for Portland metro area residential growth. Thank you for the opportunity to comment.

Karen Wood
14910 NE 46th St
Vancouver, WA 98682
kwood@pacifier.com

McCall, Marilee



From: Susan Setterberg <smsetterberg@yahoo.com>
Sent: Monday, September 01, 2014 8:08 AM
To: Cnty 2016 Comp Plan
Subject: Vancouver Audubon Society comments on 2016 comp plan update

As Vice-president of the Vancouver Audubon Society, I attended the Ridgefield Open House on the update of the 2016 Comprehensive Growth Management Plan.

Vancouver Audubon suggests that attention be paid to the needs of birds and other wildlife in our county to promote the quality of living in our communities. The plan should thoughtfully and thoroughly consider the needs for adequate habitat types, quality and size to sustain and attract native birds and other wildlife. Although wetlands often get attention due to state and federal mandates for protection; various uplands and other habitat types, including farmland, should be considered in depth relative to sustaining wildlife.

Many studies have been done on the effect of fragmenting habitats and they have exposed some serious concerns. In addition, there have been successes with creating wildlife corridors to allow safe movement of species between favored habitats. The plan would benefit from identification of native wildlife, including migrant species, and assuring habitat remains in adequate amounts to sustain these populations.

Susan Setterberg
Vice-President
Vancouver Audubon Society

McCall, Marilee



CP16#0240

From: NoReply@Clark.Wa.Gov
Sent: Monday, September 01, 2014 10:26 AM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: EIS Scoping - Camas

Comments:

Concern= density + # of housing developments. Highly dense subdivisions= drain on schools, parks, open space, recreation, & roads. Athletic fields are far insufficient. CHS can't be added to again & a vote by staff & students = no 2nd high school. We are becoming a community of subdivision after subdivision & if not for Lacamas & Round Lakes, we would also be very generic & have no unique identity. Populations rise too quickly & as a result, quality of life in Camas suffers.

Submitted by:

Madeline Lyne

Email: lyne272@gmail.com

Address:

755 NW View Ridge St

Camas, Washington

McCall, Marilee

From: NoReply@Clark.Wa.Gov
Sent: Monday, September 01, 2014 11:51 AM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted



CP 16# 0241

Following comments were submitted online:

Parcel No:

Subject: EIS August Meeting in BG

Comments:

Please consider shrinking the urban growth boundary for the city of Battle Ground. Put the land back in small farm agricultural use. Big box development projects only produce short term construction employment and low wage permanent jobs. Let's raise the standard for construction and increase job site inspections to insure higher quality construction. Waiving fees, permits, and inspections only encourages shoddy work. Thank you. Mark Gawecki

Submitted by:

Mark Gawecki

Email: msgawecki@comcast.net

Address:

McCall, Marilee



CP16#0242

From: NoReply@Clark.Wa.Gov
Sent: Monday, September 01, 2014 12:35 PM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: local agriculture

Comments:

We live on 20 acres zoned ag. and would urge protection of agricultural land. The last questionnaire we received which offered the "choice" to develop "clusters" rather than restrict to 20 acre ag. zoning was a farce. Instead send the real question, offering the higher tax bill that comes with the open development season on our agricultural land. When our farm land is paved over and built upon, it's gone. We must have local ag. for food safety, air and water quality and for our grandkids.

Submitted by:
Dawn Doutrich

Email: majus@aracnet.com

Address:
6505 NE 209th st.
battle Ground, Washington

McCall, Marilee

CP16#0243

From: Brad Fresch <bradfresch@msn.com>
Sent: Monday, September 01, 2014 8:33 PM
To: Cnty 2016 Comp Plan
Cc: 'Dee Fresch '
Subject: 2016 Comprehensive Growth Management Plan - Battle Ground

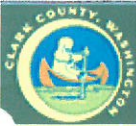
On August 27, our neighbor Leo Moon (11814 NE 177th Circle Battle Ground 98604 showed us a zoning map for the 2016 Battle Ground Comprehensive Growth Management (CGM) Plan. This map showed the 20 acre wetland parcel located directly to the North of my property at 11612 NE 177th Circle Battle Ground, Wa (account #119205157 owned by Carolines Enterprises LLC; it lists no property value) re-zoned as "industrial".

Please see the screen shot below which has the property referenced highlighted. As you can see in the map below, the referenced property is virtually surrounded by private residences in multiple subdivisions. There is no road that runs to it from any direction. I need to question the reasoning behind any such re-zoning, if true, this appears to be a classic example of "spot" zoning. There needs to be gradual zoning transition areas between residential and industrial, which if this zoning change is accurate, doesn't meet this requirement.

There's also a road proposed between NE 179th Street to the East located in Clark County, and SW 40th Street to the West. We need to question the reasoning behind this proposed road as well. There are approximately 35 affected properties that would be directly impacted by this proposed road. Many of these properties have come into existence since the 2006 CGM Plan. Part of the plan related to this road belongs to Clark County which includes the Meadow Glade area, as well as the Battle Ground Urban Growth area to the South and Battle Ground City property to the North.

I continue to question the logic behind this proposed road in the CGM. There are no properties or populated areas currently located directly to the East of Hwy 503. It appears that a better, more appropriate plan would be to widen the existing roads of NE Cramer Road and Ne 189th Street. There needs to be a buffer, with gradual transitions between any proposed new roads and existing properties. With the proposed design, no buffer or gradual transition exists. The area related to this road proposal has developed in what appears to be a much different manner than was envisioned in the 2006 CGM. It's all low density residential properties with several high end subdivisions. This road proposal needs to be eliminated from the 2016 Battle Ground, and Clark County CGM Plans.

I look forward to receiving a response to the concerns I raised.



Map Sites Find Parcel Search Locate Address Print Map Legal Feedback



Show / Hide

Layers Search Info

Parcel Report

[Zoom To Parcel on Map](#)
[Property Information Center](#)

Parcel Information

Account Number: 119205157

Property Location Address
no situs address available

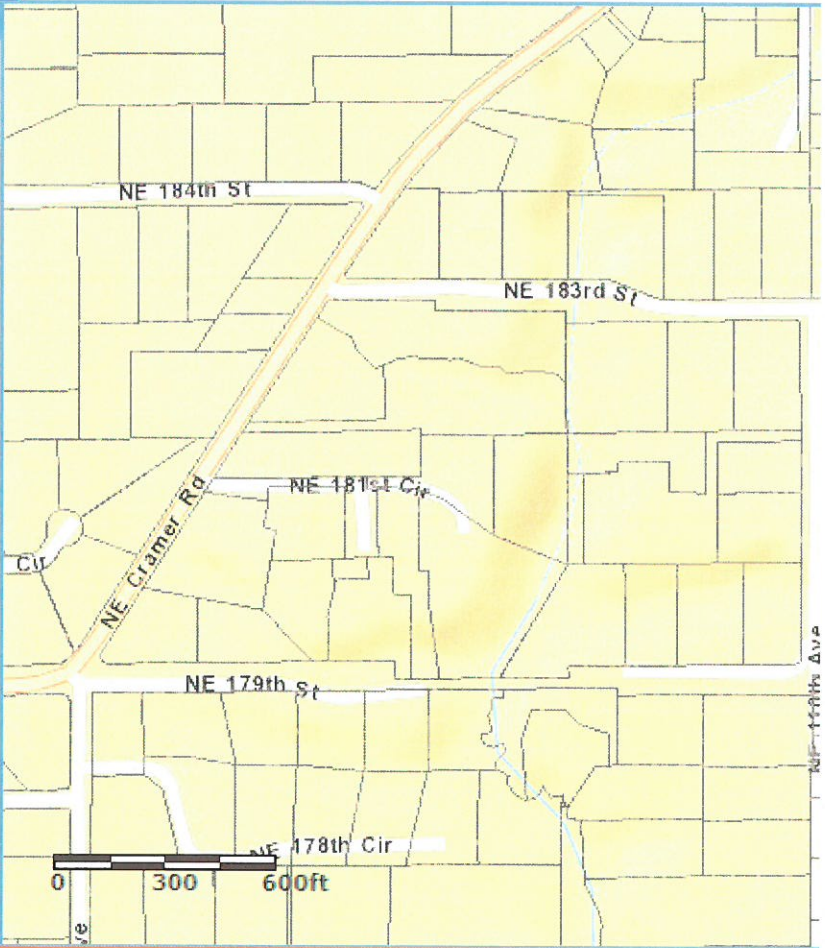
Property Owner
CAROLINES ENTERPRISES LLC

Owner Mailing Address
9901 NE 170TH ST
BATTLE GROUND WA, 98604

Most Recent Sale

Sale Date: 04/11/2003
Document Type: D-QCD
Document Number: 0547517
Sale Amount: \$0.00

Property Photo



Best Regards;

Brad Fresch



WAIT / COVER OF 4
PAGE ATTACHMENT

McCall, Marilee

CP16#0244

From: Wait, Judith Ann <judith.wait@email.wsu.edu>
Sent: Monday, September 01, 2014 9:58 PM
To: Cnty 2016 Comp Plan
Subject: Scoping comments Comp Plan EIS
Attachments: Clark Co Comp Plan EIS scoping Jude Wait comments 1 sept 2014.pdf

From: Wait, Judith Ann
Sent: Monday, September 1, 2014 4:44 PM
To: Euler, Gordon
Subject: Scoping comments Comp Plan EIS

Gordy,

Happy Labor Day.

Attached are my comments. Thanks for accepting them via email.

Respectfully,

Jude Wait

I am submitting comments per the Scoping process for the SEIS on the Comprehensive Growth Management Plan for Clark County. First, the comment period is way too short given the one working day between the last Open House and the deadline which falls on Labor Day.

While my comments should not be seen as representing the views of anyone but me, they may indeed be agreeable to other residents, food system stakeholders, farmers, and other planning process participants such as a newly formed food system task force. I am a food system researcher focused on the resilience of food farming for regional food security. I have reviewed documents pertinent to Clark County, nearby Counties in Oregon and Washington, and literature (both gray and peer-reviewed) addressing food and farming systems issues across North America and internationally.

While Clark County is understudied, its current policy-makers are notoriously perceived as pro-development in a County with rampant sprawl and a lack of support for farmers. This perception and other forces probably further the degradation of commercially viable agricultural production. I suggest the County strive to use the Comp Plan update and EIS processes to remedy the situation in reality. First, the current condition needs to be reanalyzed using current information, starting with the reports released since 2007, and by conducting additional research and analyses. I have joined a task force that will further these goals, as such a process should not be led by one consultant hired by the County. (Please see also the comments from Food System CARE.) Nor can the County be solely in charge of public engagement. The County should instead focus on doing its job per the intent of the GMA and environmental mandates, including more adequate outreach and timeframes for public input. The County can partner with independent citizen task forces might not be trusted to take the lead.

As a COMPREHENSIVE Growth Management plan, the plan should incorporate and reference other documents and information. Given new information, evaluation of the last seven years, and a more concerted effort to assess agricultural protection, the EIS as well should cover water quality and quantity, fish and wildlife, Legacy Lands (Environmental_Services_Dept, 2014), parks and recreation, ecosystem and resource conservation, watershed management plans, public health, Smart Growth.

The EIS should address *cumulative impacts* of rapid urbanization given past actions (implemented, leading to direct and consequential impacts) and proposed actions.

The impacts of the last Plan update can now be reanalyzed with hindsight to what has transpired with respect to jobs, land use, economic development, business viability, and other issues. Current data should be obtained, ground-truthed and analyzed. Results could drive the updated plan and environmental analyses.

For Clark County's comprehensive plan and EIS, the following topics should be added or expanded to help address the food system within the comprehensive plan: "Land Use Element

- Agriculture and urban agriculture
- Community gardening
- Healthy food access Transportation

Element • Healthy food access and distribution Housing Element • Healthy housing Economic Development Element • Local food distribution and sales • Procurement Human Development Element • Community food security • Food assistance programs • Emergency planning • Coordination of joint planning and services Environment Element • Environmental impacts of the food system” (Puget_Sound_Regional_Council, 2012).

Also, recommendations for policy and action priorities, as well as the kinds of data informing policy and agri-food system strategies (modeled after Fisher & Roberts, 2011) should be considered for implementation in the Comp Plan, a food system element perhaps, and the applicable environmental analyses (jobs, health, economics, food waste and the environment, environmental protection, Parks & Recreation, transportation, public safety, emergency response, etc.). Once a baseline of data is established, policies in place (and those of the past), future actions include monitoring progress over time. Evaluation criteria should address farm preservation and agri-food system resilience. The County should consider indicators found in State and municipal publications (Fisher & Roberts, 2011; Office_of_Farmland_Preservation, 2009).

Furthermore, please fully consider the economic and environmental values of agriculture [http://be.futurewise.org/p/salsa/web/blog/public/?blog_entry_KEY=7013 as well social infrastructure. Clark County should PLAN to rank high on the County Scorecards applied to Puget Sound Counties (Canty, Martinsons, & Kumar, 2012) and conduct fund a foodshed study (such as in Hoopenboom, Sloane, & Canty, 2012).

The County should do something to mitigate the admitted impacts such as “The incremental loss of farmland impacts the continued viability of farming, making it more difficult to sustain the role this sector plays within the life of Clark County. It also impacts the other values that are associated with farm land, including open space and scenic values” (Final EIS for the Comprehensive Growth Management Plans of Clark County... 2007). Furthermore, consider more fully the impacts on habitat, ground water recharge, impervious surfaces, watershed changes such as increased flood potential, etc.

What does it mean that “Land proposed for conversion to urban uses consists of agricultural districts (about 4,600 acres), urban reserve (about 3,000 acres), and rural residential (about 4,000 acres). About 3,200 acres would be industrial, commercial, or employment center lands” (FEIS 2007)? Are there agricultural districts? Agriculture should be considered an ‘employment’ center, along with associated businesses and infrastructure.

What has the County done towards “rural land mitigation could include: County designations of a larger portion of the undeveloped rural lands with soils identified by SCS as prime agricultural and forest lands as resource lands, regardless of lot size; Incentives (e.g., transfer or purchase of development rights) and strict development regulations to discourage construction of residences on subdivided resource lands; [and] Adopt “No net loss” policies for rural designations” (FIES 2007, page 72/123)?

Please consider agricultural land preservation and economic development as being on the same side, in contrast to the FEIS language “Balance goals e.g. economic development versus agricultural land preservation” (page 15/123). How can the assessment of agricultural lands have been completed “prior to plan adoption” but not be assessed in the FEIS? Were individual farms asked about their viability?

How was “the incremental loss of farmland impacts the continued viability of farming, making it more difficult to sustain the role this sector plays within the life of Clark County. It also impacts the other values that are associated with farm land, including open space and scenic values” analyzed, and were the impacts mitigated (FEIS page 40/123)?

Please include urban agriculture in the Parks & Recreation and Open Space network plans. UA provides multiple benefits generally falling within ‘quality of life’ categories.

What kinds of input to Comp Plan do neighborhood associations have? Were they contacted?

How much land is in agricultural production and active farming? How much is left? How much is needed to ensure food security and long term commercial viability?

An agricultural and food production element is warranted, especially given the likelihood of a natural disaster such as earthquake or flood that disrupts the food distribution system. As well, climate change is impacting food production around the world, so the more self-sufficient a region, the more resilient. Diversification and multiple sources can also help build resilience.

Agriculture needs its own element or at least consider and highlight Ag issues in each element. Such as housing development, transportation, etc.

Water supply, quality, and access are key issues in the context of commercially viable agricultural production. As well, adequate supplies of clean water for domestic use, fish and wildlife, should be analyzed in the context of the EIS and Comp Plan. A monitoring plan should be added to the County’s Coordinated Water System Plan (Clark_County_Water_Utility_Coordinating_Committee, 2011) which furthers the goal of compliance with the Non-point Source permit to Clark County from the Dept. of Ecology (Clark_County, 2012).

References (included as integral to Scoping comments).

- Canty, D., Martinsons, A., & Kumar, A. (2012). Losing Ground: Farmland Protection in the Puget Sound Region: American_Farmland_Trust.
- Clark_County. (2012). NPDES Municipal Stormwater Annual Report <http://www.clark.wa.gov/water-resources/documents-manuals.html>. Washington: Clean Water Program; Environmental Services.
- Clark_County_Water_Utility_Coordinating_Committee. (2011). Coordinated Water System Plan Update: Regional Supplement (pp. 233).
- Environmental_Services_Dept. (2014). Clark County Conservation Areas Acquisition Plan: Legacy Lands Program.

- Fisher, A., & Roberts, S. (2011). Community Food Security Coalition Recommendations for Food Systems Policy in Seattle.
- Hoopenboom, A., Sloane, E., & Canty, D. (2012). Planting the Seeds: Moving to More Local Food in Western Washington. In A. F. Trust (Ed.), (pp. 46). Seattle, WA.
- Office_of_Farmland_Preservation. (2009). Washington State Farmland Preservation Indicators. In Washington_State_Conservation_Commission (Ed.).
- Puget_Sound_Regional_Council. (2012). Integrating Food Policy in Comprehensive Planning: Strategies and Resources for the City of Seattle. Seattle.

WAIT 1/4

McCall, Marilee

From: Jude Wait <info@foodsystemcare.org>
Sent: Monday, September 01, 2014 10:01 PM
To: Oliver@foodsystemcare.org
Cc: Euler, Gordon; Jude Wait
Subject: [FWD: Comp Plan EIS scoping comments]
Attachments: Clark Co Comp Plan EIS scoping Food System CARE 1Sept 2014.pdf



CP16#0245

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

Subject: Comp Plan EIS scoping comments
From: "Jude Wait" <info@foodsystemcare.org>
Date: Mon, September 01, 2014 4:43 pm
To: "Gordon" <Gordon.Euler@clark.wa.gov>

Gordy,

Comments attached.

Respectfully submitted,

Jude Wait
Food System CARE <info@foodsystemcare.org>

Food System CARE co-convened a task force to pursue immediate and long term food system strategies. Our goal is to facilitate greater support for sustainable food production agriculture and community resilience in Clark County's food system.

Clark County food system stakeholders are endeavoring to retain and increase local food production and sourcing in a region with significant food insecurity and development pressure (Clark_County_Food_System_Council, 2012; Public_Health, 2012). Initiatives to influence the Clark County Comprehensive Growth Management Plan update process motivated us to coalesce and activate now. Indeed the Food System Council has already submitted documents to the County (Clark_County_Food_System_Council, 2013), and we agree with their content and intent, including the handout from the Open House Scoping sessions (hereby additionally included as Scoping comments).

1. Public scoping comments are due on Labor Day 2014—after Scoping “Open House” meetings on August 20, 21, 28, 29 provided the public an opportunity to learn from County Planning staff about the issues and alternatives. The purpose is “to define issues related to the comprehensive plan update that will be addressed in the draft SEIS (Supplemental Environmental Impact Statement). **The comment period was way too short between information sessions and due date.**
2. We will interact with the Comp Plan Update process as it proceeds. For instance, we will provide input to the official record on the revised Comprehensive Plan and the revised (and/or Supplemental) EIS to be released by the County.
3. Given the changes in the system since 2007, we recommend the old documents be scrutinized for accuracy and applicability. How well were the impacts of the huge GMA expansion predicted? What has transpired since 2007? There is new information in reports produced since then, but they too are outdated now (Berk_Consulting, 2012; Gilroy, 2008; Globalwise_Inc, 2007; Meter, 2008; Moser, 2010). Furthermore, the actual impacts on the agri-food system, such as farm and home foreclosures, land sales, conversions to other uses, etc., should be investigated. What is really going on with Current Use taxation designations?
4. Within the County planning context, we support maintaining and enhancing the “long term commercial significance” of the agricultural sector as directed under the Growth Management Act. However, we suspect the County has fallen tragically short on their intent to meet the mandate. Farmland has been lost across the County, in part through conversion to other land uses, and incorporating viable farmland into the UGA without acknowledging the importance of ongoing urban and urban-interface agriculture. As the nature of agri-food system commerce has changed over recent decades—with an upsurge in local and direct marketing strategies, a greater variety of operational scales and diversified cropping, for examples—we would offer a broad inclusive definition of “commercial” and “significance.”

5. Parcel sizes should be maximized for farming in rural and urban interface areas, along with more support for infrastructure revitalization. Preventing further fragmentation through agricultural districting is but one of many tools we recommend. Whole-system support for farmers would address the numerous barriers farmers have already identified, repeatedly. Solutions recommended by farmers and other stakeholders should be considered for implementation (Ag.Preservation_Committee, 2009; Rural_Lands_Task_Force, 2010), and evaluated as part of the Comp Plan and SEIS. This could mean an additional Alternative or an added set of issues to be presented and evaluated.
6. There is also a vibrant urban agriculture sector provisioning many families through the Food Bank, community gardens, Growing Groceries, Master Gardener mentors, school and church gardens, etc. The growth in this sector should be prominent in the Plan and impact analyses. Support and recognition are due. These are job and skill building sectors as well, along with improving food security and health, and reducing hunger and poverty.

We realize the need for independent food system initiatives as well, and many are underway. We intend to recognize them and fill some of the gaps to achieving greater collective impact and our vision for a more resilient region.

1. Acting as a network facilitation hub, our aim is to interconnect the wide array of food system stakeholders, including the voices underrepresented in public discourse—which is primary to the mission of Food System CARE.
2. We think the County and others should pool resources in order to support
 - a. improved, upgraded and updated information on the agri-food sectors—which is needed to inform smarter long term planning
 - b. increased public engagement through an independently facilitated process such as Wisdom Councils.

Thanks for your consideration of these comments. We are available to answer questions, provide clarification, and if given more time, streamline the comments.

For the task force,

Jude Wait

Ag.Preservation_Committee. (2009). Clark County Agriculture Preservation Strategies Report.

Berk_Consulting. (2012). Memo RE: Rural Lands Study: Draft Policy Options: To: Clark County Planning.

Clark_County_Food_System_Council. (2012). Policy Roadmap for Clark County's Food System: Strategies for Change.

Clark_County_Food_System_Council. (2013). Promoting Agricultural Food Production in Clark County.

- Gilroy, A. (2008). Exploring the Clark County Food System: a food system assessment sponsored by Steps to a Healthier Clark County, Community Choices, and Clark County Public Health, for the Clark County Food System Council.
- Globalwise_Inc. (2007). Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington.
- Meter, K. (2008). Finding Food in Clark County (Presentation).
- Moser, C. (2010). Clark County Equity Report. Vancouver: Washington State University.
- Public_Health. (2012). Growing Healthier: Planning for a healthier Clark County.
- Rural_Lands_Task_Force. (2010). Rural Lands Task Force Recommendations: Clark County Board of Commissioners.

McCall, Marilee



CP16#0246

From: Euler, Gordon
Sent: Tuesday, September 02, 2014 7:59 AM
To: O'Donnell, Mary Beth
Cc: Orjiako, Oliver; McCall, Marilee
Subject: FW: 2016 Comprehensive Growth Management Plan

Mary Beth:

For the index.

Gordy

From: Lynn Carman [<mailto:lynn.carman@comcast.net>]
Sent: Monday, September 01, 2014 4:09 PM
To: Euler, Gordon
Cc: Cnty Board of Commissioners General Delivery
Subject: 2016 Comprehensive Growth Management Plan

Lynn Carman
11104 NW 33 Avenue
Felida, WA 98685
September 1, 2014

Board of Clark County Commissioners
1300 Franklin Street
Vancouver, WA 98666-5000

Honorable Clark County Commissioners:

RE: 2016 Clark County Comprehensive Growth Management Plan 2016

I will request that my comments be included in any current or developed 'Administrative Record' assigned or established for this project.

It is time that Clark County move away from the 'Status Quo' option and take a serious look at the density that has been deemed upon Clark County with the first go around of GMA in the 1990s. I can speak on the Felida area issues and the total destruction of the density deemed upon this area. All one needs to do is go back to the West Felida Plan area and see what a mess that area is in. The county deemed this area in the 1970s to no development when the first development came up off McCann Roadway. Then again DOE told the County that the density was an issue of concern but yet the County did nothing. The roadways are failing faster than anything with the density we see out there and with the development on the South end with Erickson's projects we are going to see this end follow suit like McCann Roadway. The folks in Felida are doomed! The county needs to stop relying on main arterials and put in a grid system so that folks can safely get out of an area if there is a disaster. But again what can one say,

Clark County hasn't abided by what is in the best interest of its citizens for over 70 years not with the neglect and use of band aids instead of serious planning. So if we see this in the Felida area, what is it doing all over Clark County??? Development has ruled for all these years for what, to make us a bedroom community to Portland? You talk about adding jobs, but close that barn door. With jobs and more citizens, you have neglected the emergency services end of keeping the area residents safe. What does your oath read?? Again there are folks that have been screaming since the first go around of GMA.....you add more citizens, you need to make sure you add more emergency service folks to keep up with the demands. I was shocked to find out you only have 3 sheriff deputies for the night shift.....what message are you sending to the citizens?? Crime pays well here!

When there is the issue of water quality, which is a joke. When you allow a development to move forward, it is engineered a certain way. The hearing examiner rules roof drains must go into dry wells and it's a joke when the homeowner then put in French drains without a permit process to make the bio pond over flow. Whom down there is taking stormwater seriously?? Then the County comes along with their own project and dumps

stormwater into a privately own experimental stormwater system.....this is totally against the law. Why isn't the County putting in a bio pond for this project, you make developers jump through hoops but the County violates the clean water act?

I totally believe in karma and I hate to say this, I told you so in the first go around of GMA. It's failing the citizens of Clark County and it's become a joke....Clark County isn't planning for future generations. Sim City is failing us all. Start taking a proactive stance on growth and stop the density that we all see now before it's gets worse.

Sincerely,
Lynn Carman

McCall, Marilee



CP16#0247

From: NoReply@Clark.Wa.Gov
Sent: Tuesday, September 02, 2014 12:09 AM
To: Cnty 2016 Comp Plan
Subject: 2016 Comp Plan comments submitted

Following comments were submitted online:

Parcel No:

Subject: Amboy Rural Center Zoning

Comments:

Has been a number of years...hat ever happened to the rezoning of rural center Amboy to one acre parcels ? Has been kicked around for 20 years to make the land more useful.

Submitted by:

Ken Maylone

Email: kdmaylone@aol.com

Address:

O'Donnell, Mary Beth



From: Tilton, Rebecca
Sent: Tuesday, August 26, 2014 11:39 AM
To: Barnes, Ed; Madore, David; Mielke, Tom; Orjiako, Oliver; O'Donnell, Mary Beth
Subject: Comp Plan Update - Public Comment (CCCU)
Attachments: Carol Levanen_08-26-14.pdf

Hello,

Attached please find written comments submitted by Carol Levanen during the Board's Hearing of Aug. 26 (public comment time).

Thank you,
Rebecca

cc'd Board
Oniako
O'Sonnell

Rec'd 8/26/14 - public comment
(Carol Levanen)

Clark County Board of Commissioners
P.O. Box 5000
Vancouver, Washington

August 26, 2014

Clark County Citizens United, Inc. often receives calls from landowners who are processing a land division and tries to help allow the process to go smoother. Previously, lands five acres or larger were legally created by a segregation process. A surveyor created a legal description, which was filed with the auditor's office. When and if the land was sold, the new owner's responsibility was to apply for a building permit, provide a water source, and construct a driveway. Now, the short plat process has a whole new very expensive meaning. But, proportionality must legally apply to such a process.

A pre-application conference, short plat application, post decision review and the final plat permit must now occur, with each one requiring a fee. The landowner must hire someone to go through those processes, which is expensive. Under these applications, one must provide potable water, build roads, and go through many expensive procedures, that could amount to eighty items. Here is an example of the overreaching requirements.

A man died from cancer and the widow decided to sell her home to her children and build another home on the land. The land was approximately 20 acres and was in a five acre zone. The woman saw she could divide the land into three parcels, one for the existing home and children, one for her new home and one to help pay the expenses and decided to begin a short plat process. After many years, the process is still not finished and the county keeps putting up road blocks. One condition was that she deed a very large thirty foot easement, down one side of her property to Clark County. This requirement is illegal, under state law, unless the county pays for it. A partial list of requirements is included in this report, but there may be some that have not been mentioned. These are the expenses she has incurred so far, all in the name of regulation.

County permit fees - \$16,215.00	Consulting firm - \$28,318.00
Geotech study - \$1,000.00	Engineering - \$6,262.00
Three wells drilled \$26,241.00	Signs - \$44.44
Electric - \$2,053.00 after pro-bono help	Septic - \$89.00
CPU - \$215.00	Attorney - \$3,988.75
Driveway construct - \$14,830 after pro-bono help	Survey \$14,351.00

The total to date is \$113,607.00 and the short plat is not complete yet. The children are waiting to purchase the home and the woman pays to live in an apartment. Development requirements and associated costs are close to equaling what she would receive from the sale of the third parcel. She has lost all of the value of that lot, which will not generate any financial aid to her. There is something wrong with this picture. **The short plat ordinance needs to be fixed.** Only safety, survey and legal documents should be included in the process of simply dividing acreage, for whatever purpose, be it agriculture use, forest use or housing, with the building permit addressing the development process.

Sincerely, 
Carol Levanen, Ex. Secretary, Clark County Citizens United, Inc.

O'Donnell, Mary Beth



CP16#0249

From: Niten, Jeff
Sent: Wednesday, August 27, 2014 3:19 PM
To: O'Donnell, Mary Beth
Subject: FW: CREDC Comments on Clark County Economic Development Policies
Attachments: CREDCClarkCountyEcDevPoliciesFeedbackFINAL.pdf; Lands for Jobs recommendations-1-10-12.pdf

For the record

Jeff Niten
Planner III
1300 Franklin Street, 3rd Floor
Vancouver, WA 98660
P.O. Box 9810
Vancouver, WA 98666
360-397-2280 x 4909

From: Mike Bomar [<mailto:MBomar@credc.org>]
Sent: Thursday, August 21, 2014 3:14 PM
To: Niten, Jeff
Cc: Swanson, Jeff
Subject: CREDC Comments on Clark County Economic Development Policies

Hi Jeff,

Thank you for the opportunity to submit comments. I have also attached our Board approved Lands for Jobs Committee recommendations for your reference. Please let me know if you have any questions.

Best,

Mike Bomar
President
D: 360.567.1060|O: 360.694.5006|mbomar@credc.org
805 Broadway, Ste 412|Vancouver, WA 98660|credc.org



Accelerating Business Growth and Innovation



Wednesday, August 20, 2014

Clark County
Attn: Jeff Niten
PO Box 9810
Vancouver, WA 98668-1995

Mr. Niten:

Thank you for allowing us the opportunity to provide comments on the proposed Economic Development Policies for the 2016 Comprehensive Plan Update. The Columbia River Economic Development Council (CREDC) is a public private partnership focused on accelerating business growth and innovation in Clark County. The CREDC is the lead organization responsible for implementing the 2011 Clark County Economic Development Plan that was adopted by Clark County and local municipalities.

In response to your request for feedback, the draft policy document was sent to our Lands for Job Committee with an opportunity for the group to provide individual feedback on the policy to be considered for this letter. The committee is made up of both public and private CREDC partners including representatives from land use consulting firms, contractors, local ports, Clark County, and the City of Vancouver.

Our feedback and recommendations are as follows in no particular order:

1. Background and Context –

- a. We recommend updating Clark County's unemployment rate to the most current figure available at the time of implementation.
- b. We recommend incorporating the **2011 Clark County Economic Development Plan** as a guiding document for these policies.
- c. The policies should frame Clark County's position in the Greater Portland Metropolitan Statistical Area, highlighting both the advantages of the region along with the competitive factors.

2. The County's Role –

- a. The CREDC supports the desire to partner with various organizations engaged in economic development:

"The County has significant indirect effects on economic development. This is primarily through partnerships such as with the Columbia River Economic Development Council (CREDC), Southwest Washington Workforce Development Council (SWWDC), Vancouver USA Regional Tourism Office, chambers of commerce, ports and other jurisdictional relationships. Through cultivation of these relationships and extensive, ongoing public engagement, Clark County will develop and maintain an economic development vision and pursue it with strategy, discipline, and intentionality."

- d. We also support policies that provide for long term preservation of key industrial sites using tools such as a rural industrial land bank.
- e. Policies 2.5 and 5.1 can be revised to better stress the importance of workforce development and education. Key leaders in the K-20 system should be engaged to provide feedback on their needs as it relates to creating better connections between educational institutions and private industry.
- f. Land supply policies should reflect the need for a certain character/type/size/location desired by target industries, not just an aggregate acreage target. Policies 3.1 and 4.1 can be revised to better address a more strategic and targeted approach to ensuring that land is available to accommodate the various types of target sector employers identified in the economic development plan.
- g. E.D. 4.3 / 4.4 – We recommend moving design guidelines and community appearance to a different policy section as it is more of an indirect benefit than a tool for economic development.

6. Technical Appendix –

- a. The jobs numbers listed are not current. We would recommend contacting referencing total jobs by target sector (from the 2011 Economic Development Plan) rather than listing employment for individual companies.
- b. If the intent of this section is to highlight the County's high employment sectors, there appears to be some missing key sectors, most notably, construction and development. The County should consider largest employers vs. target industries depending on the purpose of including the data.

Sincerely,



Mike Bomar, CREDC President

Attachments: 2012 Land for Jobs Committee Recommended Policies



Eric Fuller

Eric Fuller Inc., President,
CREDC Board Chair

Lisa Nisenfeld

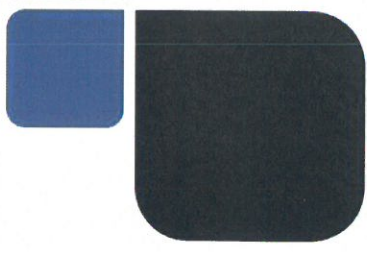
CREDC, President

Helen Devery

BergerABAM, Vice President,
CREDC Executive Board Member



COLUMBIA
RIVER
ECONOMIC
DEVELOPMENT
COUNCIL





Lands for Jobs Committee

Helen Devery (Chair), BergerABAM

Sierk Braam, Norris, Beggs & Simpson

Carol Curtis, Commissioner, Clark Public Utilities

Bob Durgan, Andersen Construction

Mark Feichtinger, Steel Rives LLP

Eric Fuller, Eric Fuller & Associates

Brent Grening, Port of Ridgefield

Bryan Halbert, Schlecht Construction

Garret Harper, Norris, Beggs, & Simpson

Steve Hill, Miller Nash

Steve Horenstein, Miller Nash

Alan Hughes, Maul Foster & Alongi

Todd Johnson, Group Mackenzie

Mark Lampton, Port of Camas-Washougal

Tim McMahan, Steel Rives LLP

Steve Morasch, Schwabe, Williamson & Wyatt

Scott Nyseth, Miyamoto International

Jerry Olson, Olson Engineering

Dennis Pavlina, The Gold Medal Group

Alisa Pyszka, City of Vancouver

Kelly Sills, Clark County

Technical Advisory Group (TAG)

Brent Grening, (Chair), Port of Ridgefield

Helen Devery, BergerABAM

Todd Johnson, Group Mackenzie

Mike Mabrey, Clark County

Jerry Olson, Olson Engineering

Curtis Shuck, Port of Vancouver

Alisa Pyszka, City of Vancouver



Committee Goals and Process

Committee Goal & Goal # 5 Clark County Economic Development Plan:

- Determine how Clark County can meet its current and future employment lands needs and how the CREDC should be involved in ensuring that sufficient developable land is available for new job creation within the community.

Process:

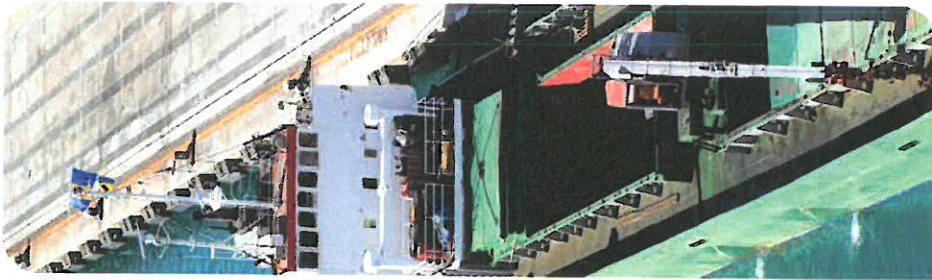
- Inventory available lands, opportunities, and constraints.
- Use inventory to develop recommendations for the CREDC to implement.
- TAG developed inventory and draft recommendations.
- Lands for Jobs Committee, public jurisdictions, and CREDC to review recommendations.





Lands for Jobs Inventory

- Base information from Clark County's June 2010 Vacant Buildable Lands Model (VBLM) and GIS data
- VBLM – Clark County planning tool developed to analyze residential, commercial, and industrial lands
- Port properties are not included in VBLM
- Committee contacted ports and included vacant land details
- Using VBLM, County split into eight subareas
- Initial screen - properties with minimum of 20 acres (size determined to be regionally significant in terms of generating employment)
- Within the Urban Growth Boundary (UGB)
- Zoned appropriately
- Unconstrained
- Contiguous (not necessarily under single ownership)

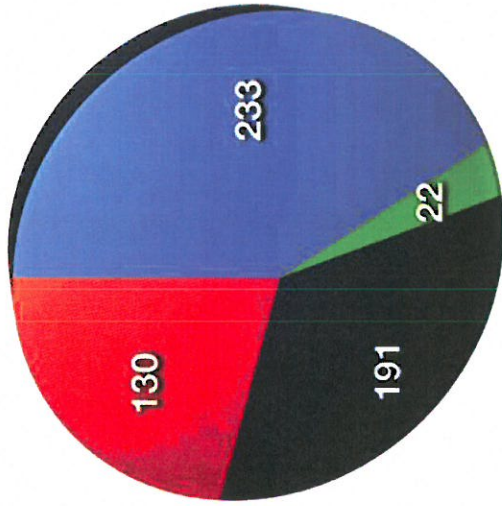


Draft Results

- 70 potentially developable sites - 20 acres or larger
- Using GIS data and TAG members' knowledge - 70 sites screened for development readiness
- Scoring criteria applied
 - common ownership
 - size
 - constrained environmentally
 - water
 - sewer
 - arterial access
- 3 levels of development readiness
 - 0-18 months
 - 18-36 months
 - + 36 months



Acreage per Zone 13 Sites



- Industrial
- Business Park
- Heavy Industrial
- Office Commercial

Key Issues

- Limited shovel ready land
 - 13 sites
 - 576 acres
 - development ready 0-18 months
 - constraints - infrastructure, ownership
- Need to increase shovel ready land
- CREDC focus on lands for jobs



1. Lands for Jobs Committee

The CREDC needs to work to ensure that there is sufficient readily developable land available for job creation in Clark County by:



COLUMBIA
RIVER
ECONOMIC
DEVELOPMENT
COUNCIL

Draft Recommendations



1. Lands for Jobs Committee, continued

- Making the **Lands for Jobs Committee a standing CREDC committee.**
- Developing a work plan to address Committee recommendations to track and respond to land, zoning, and UGB changes.
- Developing conceptual layouts for the 13 most readily developable sites which could be provided to site selectors.
- Tracking new market credits to determine whether these could be applied to industrial land.
- Assigning a CREDC staff member to the Committee as a resource. Responsibilities for the CREDC staff member should be defined and should include keeping up to date on changing regulatory and policy issues related to lands for jobs and providing updates and suggested direction to the Committee.
- **Including a report on lands for jobs in the CREDC annual report.**

2. Zoning/Permitting/Urban Growth Boundary

In the short term, zoning, permitting, and regulatory changes have positive and negative effects on the development readiness of land within Clark County. In the longer term, the UGB will define which areas provide potential opportunities for new lands for jobs. The CREDC should be influential in working with the community as coherent choices are made about the supply and availability of lands for jobs and the investment strategy needed to ensure their availability and readiness. This will be particularly important during future Urban Growth Area revisions. A local example of positive policy change is the fast track permitting program that was recently developed for projects of state-wide significance in Oregon. The CREDC needs to fully engage in land use policy, zoning, permitting, and UGB issues by:

2. Zoning/Permitting/Urban Growth Boundary, continued

- Working with jurisdictions to ensure that zoning codes provide flexibility, particularly within industrial and mixed-use districts to preserve their use for lands for jobs.
- Working with jurisdictions as zoning codes are updated to ensure that lands for jobs are protected.
- Working with state and local agencies to determine opportunities for **expeditious and pre-permitting of properties.**
- Working with jurisdictions to simplify and expedite permit processing timelines.
- Implementing a standing subcommittee to track and advocate zoning/code revisions that could affect lands for jobs.
- Working with Clark County as future decisions on the UGB are made. When the Growth Management Act process is revisited, the CREDC should be at the table to advocate for lands for jobs.
- Working with Clark County to bring current urban holding lands into the UGB.



Draft Recommendations



3. Infrastructure

The Lands for Jobs Committee noted that to encourage new job growth, we need to lead with infrastructure which is often constrained by our pay-as-you-go policy. For example, of the 13 readily developable sites within the inventory, 5 are in Ridgefield which is constrained by regional sewer capacity in north Clark County. The CREDC should be involved in developing creative and cost-effective solutions by:



3. Infrastructure, continued

- **Advocating for infrastructure investment** including new roads, rail, bridges, and utilities within the county.
- Working with public agencies to advocate and obtain **funding for key infrastructure** projects within the community, particularly for properties which could become shovel-ready and add to the available lands for jobs as a result.
- Advocating for **creative solutions to infrastructure needs**. (A good example is the non-gravity sewer system solution that made available lands for jobs in the City of Camas during the 1990s.)
- Advocating for a **solution to the regional sewer discussions** on-going in Ridgefield. A solution that is cost efficient and can be implemented within the short term is required.

4. Lands for Jobs Inventory

The Lands for Jobs inventory is a useful tool which took significant staff and volunteer time to prepare and review. The CREDC now has a good source for information about land within Clark County. Since land is bought and sold and infrastructure opportunities and constraints change constantly, the inventory should be seen as a living document and should be kept up to date by:



4. Lands for Jobs Inventory, continued

- Assigning a CREDC staff member to ensure that the **inventory is updated regularly**.
- Encouraging ongoing input about buildings into the inventory.
- Developing a useable and efficient **tool to track project demand** by property, size, and type.



COLUMBIA
RIVER
ECONOMIC
DEVELOPMENT
COUNCIL

Draft Recommendations



5. Industrial Land

Of the 70 sites larger than 20 acres in the inventory, only 13 are potentially ready for development and only 7 of these are zoned for industrial use. The Plan notes that sites, including Centennial Industrial Park (Mancouver), 199th Street Industrial Area (Battle Ground), Ridgefield Industrial Park and Discovery Pointe (Ridgefield), and Camas Meadows (Camas), could be available for development in the short term. The Lands for Jobs Committee has concluded that there is a critical need to ensure an adequate supply of industrial land and the CREDC should be an advocate for this by:



5. Industrial Land, continued

- Increasing the inventory of industrial land in the county.
- Ensuring that industrial lands within the 18-month timeframe remain ready for development and those within the 18-36 month timeframe can be made shovel-ready.
- Advocating for the preservation of industrial zoning/comprehensive plan designations.
- Encouraging retention of larger parcel sizes which are essential to this sector.
- **Supporting Clark County ports which are critical in ensuring an adequate supply of industrial land.**
- **Advocating that Clark County ports work together to land bank industrial land for the future, within and outside existing port boundaries.**
- **Supporting Clark County ports in buying and aggregating land, developing infrastructure, and selling/leasing industrial land in the county.**
- **Supporting Clark County ports in obtaining financing to purchase and develop heavy industrial lands.**
- Working with the City of Vancouver and Clark County to determine whether there are existing light industrially zoned properties that could be used for heavy industry.

Draft Recommendations



COLUMBIA
RIVER
ECONOMIC
DEVELOPMENT
COUNCIL

6. Commercial Office/Business Park

The Lands for Jobs Committee concluded that the retail sector is well represented in the community. However, the CREDC should be forward-thinking and recognize that future job growth in Clark County is likely to result from new office and business parks in sectors such as software development, healthcare, and professional services. The inventory indicates that only 3 sites larger than 20 acres and zoned for business park use are potentially ready for development within 18 months. For commercial office/business parks, the CREDC should be:



COLUMBIA
RIVER
ECONOMIC
DEVELOPMENT
COUNCIL

Draft Recommendations

6. Commercial Office/Business Park, continued

- Increasing the inventory of shovel-ready lands for employment office/business parks in the county.
- Supporting Vancouver, Ridgefield, and Camas/Washougal as appropriate land for waterfront mixed-use development is purchased, planned, and developed.
- Ensuring that commercial office business park lands within the 18-month timeframe remain ready for development and those within the 18–36 month timeframe can be made shovel-ready.
- **Refocusing on ensuring that land in the Discovery Corridor is developable for new office and business park uses.**
- **Working with educational institutions to find land for business parks, readily accessible to WSU Vancouver to leverage research and development opportunities.**



Draft Recommendations



Next Steps

- **October** – November 2011 – Lands for Jobs Committee review of inventory and recommendations
- **November** – December 2011 – CREDC Executive Committee and Board to review and approve
- **October** – December 2011 – CREDC review land inventory with each public jurisdiction and ports
- **January 2012** – Roll out to community



COLUMBIA
RIVER
ECONOMIC
DEVELOPMENT
COUNCIL



O'Donnell, Mary Beth



CP16#0250

From: LaRocque, Linnea
Sent: Thursday, August 28, 2014 8:06 AM
To: O'Donnell, Mary Beth
Subject: Resolution 2014-06-17 For the Public Record

for the file

From: Carol Levanen [<mailto:cnldental@yahoo.com>]
Sent: Thursday, August 28, 2014 1:20 AM
To: Mielke, Tom; Madore, David; Barnes, Ed; Carol Levanen; Susan Rasmussen; Leah Higgins; Rick Dunning; Rita Dietrich; Jerry Olson; Fred Pickering; Jim Malinowski; Frank White; Benjamin Moss; Lonnie Moss; Melinda Zamora; Nick Redinger; Curt Massie; Marcus Becker; Clark County Citizens United Inc.
Subject: Resolution 2014-06-17 For the Public Record

Dear Commissioners,

Resolution 2014-06-17 discusses in Table 2 the population and employment allocation, on page 2 of 4. It discusses the various cities population allocations and then describes the county population allocation of 12,556. This is in direct conflict of the Growth Management Act, which directs counties to use the population allocation numbers for urban growth, not rural growth. This was confirmed by the Washington State Superior Court and the Court of Appeals.

The Resolution also discusses the Rural Lands and states that the county must "*minimize conversion of productive farmland*". Rural land stands alone as a separate zone and landuse, not subject to population projections and independent of a resource zone. Neither is subject to population allocations, according to the laws governing the GMA. Productive farmland, under the GMA, is in a resource zone, not a rural zone. Clark County must not combine these categories, as they are most certainly separated in the GMA.

Sincerely,

Carol Levanen, Ex. Secretary
Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604



CP16#0251

RECEIVED AUG. 27 2014
RIDGEFIELD



EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: David Shroyer

Address: 17712 NW 41st Ave

Open house location: Ridgefield 08/27/2014

Comment:

I would like to see a network of walking/biking trails developed around the county. Tying into parks would be especially nice.

Rural roads are not conducive to walking or riding because they lack shoulders and cars travel too fast and too close.

My family and I cannot go anywhere comfortably from our house without using a car. I would like to commute by bike to Battle Ground and let my children ride to school.

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: _____

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



CP16 #0252

EIS SCOPING INPUT FORM

August 2014

RECEIVED AUG. 27 2014

RIDGEFIELD

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: SYDNEY REISBICK

Address: PO Box 339, RIDGEFIELD, WA 98642

Open house location: RIDGEFIELD

Comment:

See Attached

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: _____

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.

REISBICK 1/3

My Personal List: Sydney Reisbick, PO Box 339, Ridgefield, WA

Scoping: Please consider the following in the EIS for the 2016 GMP.

Water, Adequate and Clean for the long-term: Is storm water controlled, cleaned and stored in "recharge areas" that return water to aquifers? Is emphasis on keeping natural wetlands rather than engineered ones?

Limiting factors:

Does the plan have a way of stopping/delaying development if:

There is no water on the land?

There is not sustainable water on the land?

Water use by the whole county is not sustainable?

A "smart growth view" of infrastructure delivered for least cost to taxpayers: An overview of the spider web of Clark County infrastructure for the future.

Do alternatives foster an efficient web of larger pipes, wires, cables and roads between dense cities? Is the much smaller infrastructure within the green areas minimal (efficiently organized)?

Road functionality. Do they plan for upgrades with congestion? When congestion on the arterials reaches failure, then traffic avoids those intersections and comes through the collectors. When collectors fail, then traffic comes through the neighborhoods endangering children, pets and increasing stress from noise and need for vigilance.

Do they foster development of infrastructure to attract family wage jobs? A job in Clark County can mean someone does not have to go over any bridge.

Codes fostering working agriculture and forestry: Do they plan to reserve the best lands for the above? Consider the burgeoning markets for safe and digestible food (heritage and NGO). Our scattered farmlands are less endangered by genetically altered pollen than many others. Prices on safe food will increase with time relative to mass-market food. Farming is and may increase as a significant addition to family income.

Habitat, both wetland and upland. Do they foster places for wildlife and native plants, in general as well as for endangered species? Houses and businesses near green spaces are worth more than those without. Human health, both mental and physical, is better when there is access to natural areas. Do they leave large "unbuilt" places (native plant and animal places) at full "buildout"?

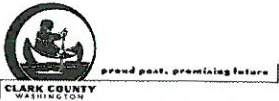
Parks and Trails. Do they foster development of neighborhood parks within ½ mile of all homes? Parks help children understand natural laws and expend energy. Are the parks and greenspaces linked by trails and/or bike lanes?

Transportation diversity: private and public. Does it plan for autos, active transport (bike lanes, sidewalks and paths for walking) and various forms of public transport?

Density in cities. Multi-unit housing for young and old. Does it prepare for the eminent "baby boomer" wave?

Mixed use zones. Does it plan for senior housing complexes near hospitals, stores and transportation?

Energy: Do they rewards energy efficiency and off grid energy production?



* 7 0 6 0 3 0 *

EIS SCOPING INPUT FORM

August 2014

RECEIVED AUG. 27 2014
RIDGEFIELD

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Amy Blankenship

Address: 19100 A NE 50th Ave Vanc WA 98686

Open house location: Ridgefield

Comment:

Our family is currently in the UGB area with an 20 acre overlay. we are zoned for multi family and are very happy about that. Yet the overlay holds us back from removing any acreage ^{any} ~~pr~~ hold us back from potential value of worth. The overlay needs to be removed and placed else where. Our family has been herding out for 17+ years.

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: _____

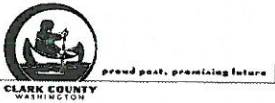
Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



CP16 # 0254
EIS SCOPING INPUT FORM
August 2014

RECEIVED AUG. 27 2014
RIDGEFIELD

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Barbara Wright

Address: 2901 S Cornett Dr. Ridgefield WA 98642

Open house location: Ridgefield

Comment:

- Please coordinate a parks and trail system county wide.
- Preserve green space with urban development
- Thank you for trying to plan for future development.

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: _____

Other ways to comment:

- **Submit a comment on the web:**
www.clark.wa.gov/planning/2016update/comments
- **Submit a comment in writing:**
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



CP16#0255

EIS SCOPING INPUT FORM

August 2014

RECEIVED AUG. 27 2014
RIDGECFIELD

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Mike Bomar

Address: 2324 S Wind River Way Ridgfield 98642

Open house location: Ridgfield

Comment:

Parks: We need a connected park system, Ridgfield Port to Vancouver
Isles.

Land Focus on preserving industrial lands and create focused public
investment areas and/or industrial lands bank.

Food Consider incentives to ^{CONSERVE} ~~preserve~~ and promote viable Agricultural
land use / activities

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: _____

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



CP16#0256

RECEIVED AUG. 27 2014
RIDGEMOUNT

EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Susan Rasmussen

Address: 30301 NE Grandy Rd. La Center

Open house location: Ridgemoor

Comment:

Resource & rural lands have been neglected in past updates.

- Had to revisit rural & resource lands
- No meta data attached to county's land use plan maps -
- No definition of "prime ag" and prime forest soils. How does the county define these?
- No soils maps attached to land use maps in meta data "created by planning staff, aerial photography, assessor's data" is not sufficient

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: spazz@tds.net

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



RECEIVED AUG. 27 2014
RIDGEFIELD

EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Susan Rasmussen

Address: _____

Open house location: Ridgefield

Comment:
- need more public mtgs, out in
the rural & resource lands
- Hopkins
- La Center
- Timbo
- Gacett
- Dollar Corner

Would you like to be added to our notification list? If so, please print your name below:

E-mail address: _____

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.
Thank you for taking the time to participate in the EIS scoping.
We appreciate your input and will use it to ensure that the SEIS contains



CP16#0257

RECEIVED AUG:27 2014
RIDGEFIELD

EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Jeff Vigue

Address: 55 S 11th St Ridgefield 98642

Open house location: Ridgefield

Comment:

It is my sincere hope that all parties are included
and listened to when adopting the future plan. I prefer
Option 3 - Cities as I believe in local govt. control.
I feel its important to include farms, parks, farms in the
conversation.

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: jvigue4@comcast.net

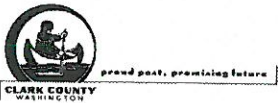
Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



CP16#0258

RECEIVED AUG. 27 2014
RIDGEPFIELD

EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: CAROL LEVANEW - Clark County

Address: P.O. Box 2188 Citizen United

Open house location: Ridgefield

Comment:

① rural land zoning and designations need to be revisited in the 2016 update

② resource land zoning and designations need to be revisited in the 2016 update

③ existing rural parcels need to be recognized and zoned accordingly

④ resource maps need correction

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

⑤ rural maps need to be corrected
E-mail address: _____

Other ways to comment:


- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



PRINT NAME	MAILING ADDRESS	ZIP CODE	PRINT NAME	e-mail list?
Jeff Sarvis	J Sarvis Eci. la center. wa. US	98629	 * 7 0 6 0 4 2 *	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Amy Blankenship	19100A NE 50th Ave	98686	blankenshipamy@yahoo.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Naomi Hansen	419 E Cedar Ave, Suite A201 La Center, WA 98629	98629	nhansen@ci.lacenter.wa.us	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Steve Stuart	230 Pioneer St. Ridgefield	98642	Steve.Stuart@ci.ridgefield.wa.us	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Susan Setterberg	2204 S. SAUK WAY RIDGEFIELD	98642	smsetterberg@yahoo.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Dameion + Sarah Smith	3909 NW 289th St Ridgefield	98642	dameionsarah@msn.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Mike Bann	2314 Wind River Way Ridgefield, WA 98642	98642	mbannar@credit.org	<input type="checkbox"/> YES <input type="checkbox"/> NO
Mitchell Allen	P.O. Box 61552 Kauai Ave WA 98666	98666	randee@msn.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Nathan McLean	2306 N 4th Way Ridgefield, WA 98642	98642	nathan.mclean@ridge.k12.wa.us	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Kelly Punzney	9215 SE Evergreen	98664	KellyPunzney@Comcast.net	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO



PRINT NAME	MAILING ADDRESS	ZIP CODE	PRINT - E-MAIL	e-mail list?
Barbara Anderson	105 WE 150th St	98685	barbara.anderson@msn.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Jeff V. Gut	SS S 113rd	98672	jviguy@comcast.net	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
John Rose	4512 NW 179th St	98642	JohnRose@coseal.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
RENEE RHEIDIAN MORIGAN	PO Box 428 33415 NW LANCASTER RD	98642	rmorigan@plasmodydd.org	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Juanita Wertz	PO Box 1676 Ridgefield WA 98642	98642	juanita.wertz@gmail.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
DARREN WERTZ	PO Box 1676 Ridgefield WA	98642	wertzcares@gmail.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Sydney Cashok				<input type="checkbox"/> YES <input type="checkbox"/> NO
Roy Garrison	1186 S. 30th Place	98642	gloroy@netscape.com	<input type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO



8/28/2014
Battle Ground

CP16#0260

EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Nancy Koski

Address: PO Box 287 Brush Prairie 98606

Open house location: Battle Ground

Comment:

The Aq land needs to go to A-10 or 5 over Aq-20 as large farms can no longer get the inputs necessary for their continuing use as a farm. Most of us are becoming older + the young farmers can ~~not~~ usually have time + money for a smaller farmstead.

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: _____

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



CP16#0261

8/28/2014
BATTLE GROUND



proud past, promising future

EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Don Hardy

Address: 1111 Main St, Suite 300, Vancouver, WA 98660

Open house location: Battle Ground

Comment:

Please include an analysis of full 20-year buildout
of the Fairgrounds and Salmon Creek Subareas and
future zoning and zoning text amendments in the
SEIS.

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: don.hardy@abam.com

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



8/28/2014
BATTLEGROUND



CP16#0262

EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: MARK GAWECKI

Address: 17706 NE HOMESTEAD DRIVE, BUSH PLAIN, WA

Open house location: BATTLE GROUND. 98000

Comment:

SINCE THE POPULATION GROWTH DID NOT MEET EXPECTATIONS,
WHY NOT REDUCE THE URSAN GROWTH BOUNDARY AND
PUT MORE LAND INTO AGRICULTURAL USE.

PLEASE CONSIDER THE QUALITY OF LIFE WHEN
MAKING DECISIONS TO CREATE JOBS. BUILDING
MORE SHOPPING CENTERS MAY CREATE SOME TEMPORARY
CONSTRUCTION JOBS AND LOW PAYING PERMANENT JOBS
BUT COVERING THE COUNTY WITH ASPHALT DOESN'T
DO ANYTHING FOR THOSE WHO LIVE HERE.

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: msgaweck@comcast.net

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



CR16 #0263

8/28/2014
BACKGROUND

EIS SCOPING INPUT FORM

August 2014

Please fill out this sheet in ink and drop it in the comment box. **PLEASE PRINT CLEARLY.**

Name: Gary Lawhead

Address: 21414 NW 67th Ave Ridgefield, WA 98642

Open house location: BG

Comment:

Strongly support reduction in AG minimum
from 20 to 10

Would you like to be added to our notification list? If so, please print your E-mail address clearly below:

E-mail address: _____

Other ways to comment:

- Submit a comment on the web:
www.clark.wa.gov/planning/2016update/comments
- Submit a comment in writing:
Comprehensive Plan EIS Scoping
Community Planning
P.O. Box 9810
Vancouver, WA 98666

Comments are due September 1, 2014.

Thank you for taking the time to participate in the EIS scoping.

We appreciate your input and will use it to ensure that the SEIS contains issues of importance to our community.



ATTENDANCE SIGN IN for: SEPA Scoping/2016 Comp Plan Battle Ground Open House
 Clark County Community Planning
 Date: August 28, 2014

** Please PRINT Clearly **

PRINT NAME

MAILING ADDRESS

PRINT - E-MAIL

e-mail list?



CP# 06054*
 0160264

PRINT NAME	<input type="checkbox"/> MAILING ADDRESS <input type="checkbox"/>	ZIP	PRINT - E-MAIL	e-mail list?
Marvin Case	13700 NE 319 th St BG	98604	Marvin Case @ msv.com	<input type="checkbox"/> YES <input type="checkbox"/> NO
Judy Kennon	P.O. Box 247 Heissen	98622	hj.kennon@msn.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Herb Kennon	" " "	"	" "	<input type="checkbox"/> YES <input type="checkbox"/> NO
Leo Wood	11814 NE 177 th Cir	98604	LMOON533 @ Q.com	<input type="checkbox"/> YES <input type="checkbox"/> NO
Gary Lashland	21414 NW 6 th Ave R. Lakeland	98642	celashland@msn.com	<input type="checkbox"/> YES <input type="checkbox"/> NO
Richard Rivas	11416 NE 177 th Cir	98644	DRYLANDS1 @ GMAIL.com	<input type="checkbox"/> YES <input type="checkbox"/> NO
Nancy Kochi	PO Box 287 B.P. 4804	98606		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Kris Richardson	4804 NE 125 th Cir	98606	Cushman KR @ MSD.COM	<input type="checkbox"/> YES <input type="checkbox"/> NO
Vicki Caldwell Kraft	2204 NE 158 th St (Salmon Creek - for sub) for sub	98686	vicki.caldwellkraft@gmail.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Kenn Wong	22300 NE 216 th Cir	98604		<input type="checkbox"/> YES <input type="checkbox"/> NO
Val Hammerley	" "	98604		<input type="checkbox"/> YES <input type="checkbox"/> NO



ATTENDANCE SIGN IN for: SEPA Scoping/2016 Comp Plan Battle Ground Open House Date: August 28, 2014
 Clark County Community Planning

** Please PRINT Clearly **

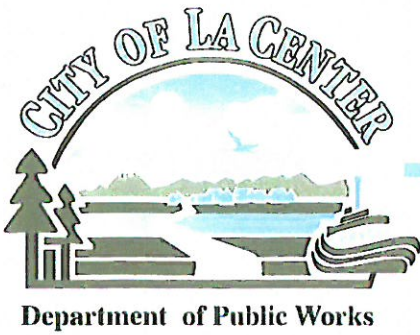
PRINT NAME	MAILING ADDRESS	ZIP CODE	PRINT - E-MAIL	e-mail list?
STEVEN BOYER	22508 NE 216TH Circle	98604	PO BOX 50 BOX NET @OUTLOOK.COM	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
MARK GAWECKI	17704 NE HOMESTEAD BUSH DRIVE, WA 98606	98606	msgaweckie@comcast.net	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Joy Russell	501 NUD 1TH St. B6, WA	98604	joyrabbgfour.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Frédéric Bering	21546 NE Lucia Falls Yacoffe	98675	fredp@yacoffe.com	<input type="checkbox"/> YES <input type="checkbox"/> NO
BEN McGOUGH	5709 BUDENA Vista Vancouver	98661	Barbra 78621@FOL	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Ray Steiger	16101 NE 183rd St BP 98606	98606	steiger@teleport.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Paula Swann	PO BOX 2188	98604	ceevinc@gladwin.com	<input type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO



ATTENDANCE SIGN IN for: SEPA Scoping/2016 Comp Plan Battle Ground Open House
 ** Please PRINT Clearly **
 Clark County Community Planning

Date: August 28, 2014

PRINT NAME	MAILING ADDRESS	ZIP CODE	PRINT - E-MAIL	e-mail list?
Debra Fresch	11412 NE 177 th Circle	98604	debra-d-fresch@yahoo.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Brod Fresch	"	"	brodfresch@msn.com	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Don Hardy	1111 Main St Suite 300 Vancouver, WA	98660	don.hardy@ubahn.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Gordon Lewis	300 W 15 th St #201	98646	gordnle@sheworldwide.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
Ann Carr	13700 NE 319 th St.	98604		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Sydney Reed	On Record	98642		<input type="checkbox"/> YES <input type="checkbox"/> NO
ERIC MICHAEL WOODWARD	25418 NE 247 th ST	98604	eric@highward.com	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
TERRY KUNNEY	8515 NE 219 th ST	98604	TERRY@SUNDIALTIME.COM	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
SL PASMUSSEK		98604		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO
				<input type="checkbox"/> YES <input type="checkbox"/> NO



CP16#0265

Presented } 8/28/2014
 into comments } BATTLE GROUND
 1/4

360.263.7665 • Fax 360.263.7666 • www.ci.lacenter.wa.us

419 E. Cedar Ave., Ste. A201 • La Center, WA 98629

July 10, 2014

Clark Board of County Commissioners
 P.O. Box 9810
 1300 Franklin Street
 Vancouver, WA 98660-9810
 Sent via email

Re: *Comprehensive Plan – 2016 Urban Growth Area Changes*

Dear Commissioners:

Recently, the La Center Planning Commission approved multiple motions to evaluate the following UGA expansion and zoning amendments during the 2016 Comprehensive Plan Update process:

1. A small expansion of its UGA at the I-5/La Center Road Junction for employment purposes,
2. Potential up-zoning land in the downtown core from Residential Professional to Commercial to encourage additional employment opportunities, and
3. Zoning options to increase multi-family housing opportunities in or near the city center.

UGA Expansion and City Zoning

Clark County requested the cities to identify whether a city will propose changes to its Urban Growth Area (UGA) and Comprehensive Plan during the 2016 Comprehensive Plan Update.

As shown in the attached figure, the properties under consideration for UGA expansion are owner-endorsed and include:

Assessor #	Owner (address)	Zoning	Gross Acres
209746000	3B NW I.L.C, 7320 NE St. Johns Rd., Vancouver, WA 98665	AG-20 (Ind. Reserve)	12.45 Ac.
209705000	Fudge Estate, C/o Griffith Trust, PO Box 180, La Center, WA 98629	AG-20 (Ind. Reserve)	24.10 Ac.
209748000	Fudge Estate, C/o Griffith Trust, PO Box 180, La Center, WA 98629	AG-20 (Ind. Reserve)	20.00 Ac.
			56.55 Ac.

All three parcels abut the city limits and are currently zoned AG-20 with an Industrial Reserve Overlay. The City will evaluate the properties consistent with their 2007 Commercial Comprehensive Plan designation and with a C-2 zone. A commercial (C-2) zoning district at the



8/28/2014
2/4

La Center Junction is intended to serve a broader semi-regional population. The City, in conjunction with the property owners, will analyze the potential of the parcels for long-term commercial significance.

In 2007 the La Center Comprehensive Plan forecast a 2024 population of 9,827 persons and 4,065 total jobs which would be consistent with the County's 2035 Planning Assumption of 1.1 jobs per household. However, La Center lost a significant amount of employment lands as a result of a successful court challenge to the County's 2007 Comprehensive Plan and the jobs to housing balance in La Center is out of balance.

Currently, there are approximately 825 jobs in the La Center UGA. The County proposes to allocate 1,367 jobs to La Center based on current Vacant Buildable Lands (VBL) analysis. The resulting 2,192 total jobs are far below the 2007 projection of 4,065 total jobs in the La Center UGA. Consequently, to help address the shortfall, La Center will propose a small expansion of its UGA for employment purposes and will evaluate up-zoning land in the downtown core.

Principles and Values

The City applauds the Principles and Values statement before the Board of Clark County Commissioners (BOCC). Among those most relevant to the La Center's present request are:

- **Employment Lands:** Equalize land allocation and jobs/population ratio so that cities have equitable share of jobs – diverse job base
- **Other Land Use:** Respect cities' investment in capital facilities by not shrinking the 2007 urban growth boundaries
- **Mapping Implications:** La Center needs greater economic diversification opportunities and multi-family land use designations

County-Wide Plan Policies (CWPP)

We have reviewed the proposed amendments to the County-Wide Plan Policies and offer the following comments into the record:

- CWPP 1.1.18. As a consequence of the legal challenge to the 2007 County Comprehensive Plan, La Center lost a significant portion of its job creating UGA. There is no longer any need for a new bridge across the East Fork of the Lewis River. The City proposes that CWPP 1.1.18 should be deleted.
- CWPP 1.1.19. In 2007, the BOCC was aware that the federal government may establish a tribal reservation within the La Center UGA. Consequently, the BOCC offered to make La Center whole by adding new employment lands into the City's UGA if the federal government established trust land near La Center. The possibility of establishing of trust land at the La Center I-5 Junction still exists. However, the proposed tribal reservation would not technically be created out of the La Center UGA; it would be created on lands currently designated as Industrial Reserve. Consequently, the City proposes to preserve the intent of CWPP 1.1.19 while clarifying the language of the existing policy as follows: "An additional 120 acres +/- of industrial land shall be added to the La Center Urban Area as an out-of-cycle subarea amendment if the United States government recognizes a new tribal

8/28/2014
3/4

reservation on land currently designated for Industrial Reserve near the La Center Urban Area.”

We appreciate this opportunity to comment and look forward to working with you again.

Sincerely,

Jeff Sarvis

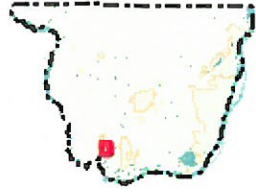
Jeff Sarvis,
La Center Public Works Director

Attachment

Copy: Mayor James Irish
Oliver Ojiako
Laurie Lebowsky

8/28/2014
4/4

La Center UGA Expansion v1

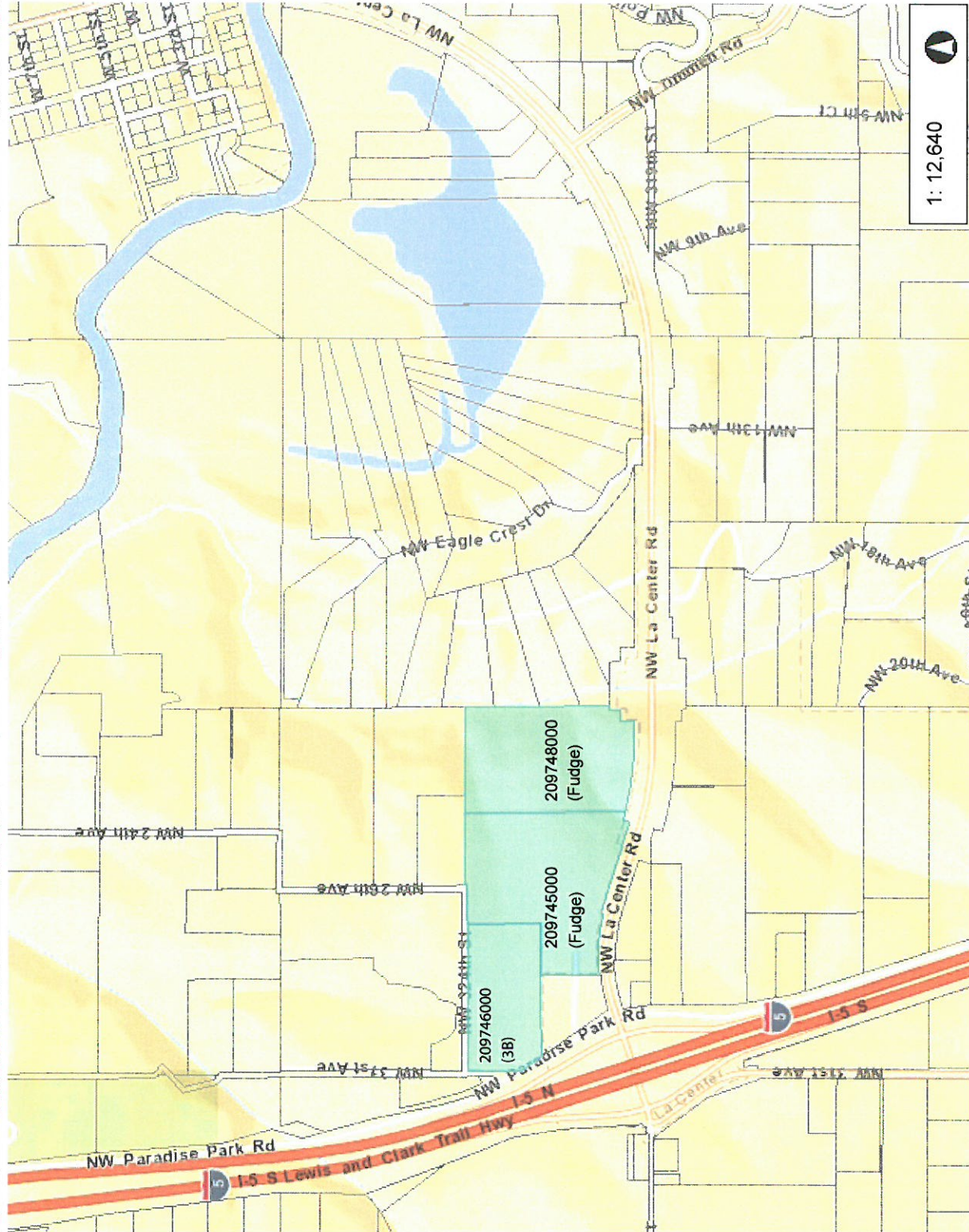


Legend

- Building Footprints
- Taxlots
- World Street Map

Notes:

3 parcels: 209745000, 209705000
& 209748000
Zoning: AG-20 (Industrial Reserve
Overlay)
56.55 Ac.



1: 12,640

2,106.6 Feet

1,053.32

0

2,106.6

This map was generated by Clark County's "MapsOnline" website. Clark County does not warrant the accuracy, reliability or timeliness of any information on this map, and shall not be held liable for losses caused by using this information.

O'Donnell, Mary Beth



CP16#0266

From: LaRocque, Linnea on behalf of Barnes, Ed
Sent: Tuesday, September 02, 2014 8:20 AM
To: O'Donnell, Mary Beth
Subject: WFB Ag Spotlight

Follow Up Flag: Follow up
Flag Status: Flagged

From: Carol Levanen [mailto:cnldental@yahoo.com]
Sent: Friday, August 29, 2014 2:20 PM
To: Madore, David; Mielke, Tom; Barnes, Ed; Carol Levanen; Susan Rasmussen; Leah Higgins; Rick Dunning; Rita Dietrich; Jerry Olson; Fred Pickering; Jim Malinowski; Frank White; Benjamin Moss; Lonnie Moss; Melinda Zamora; Nick Redinger; Curt Massie; Marcus Becker; Clark County Citizens United Inc.
Subject: Fw: WFB Ag Spotlight

Dear Commissioners,

CCCU has been researching information regarding clean water, water availability, water contamination and irrigation as it regards agriculture. These new rules from the federal government need to be seriously considered by the county as it relates to small and large farm operations. Any public food provider will more than likely be affected by these new rules, which will add another layer of costs and regulation associated with growing and selling of food. Please read the full article to have an understanding of what is being proposed.

Best Regards, Carol Levanen, Ex. Secretary, CCCU, Inc.

----- Forwarded Message -----

From: Washington Farm Bureau <tdavis@wsfb.com>
To: cnldental@yahoo.com
Sent: Friday, August 29, 2014 1:11 PM
Subject: WFB Ag Spotlight

September 19, 2014

Washington Farm Bureau's Ag Spotlight focuses on a story from our print publications, FB News and Neighbors magazine. Look for a story approximately once a week.

This week's story is from the April 2014 edition of Farm Bureau News and details the concerns Washington farmers and ranchers

August 29, 2014

Washington Farm Bureau's Ag Spotlight focuses on a story from our print publications, FB News and Neighbors magazine. Look for Ag Spotlight approximately once a week.

This week's story is from the April 2014 edition of Farm Bureau News and details the concerns Washington farmers and ranchers have over the revised Food Safety Modernization Act, with some new regulations going into effect now.

Food Safety Modernization Act: Deadlines defined, but uncertainty remains

The first regulatory impacts of the federal Food Safety Modernization Act (FSMA) will arrive in late August.

Prompted by several cases of food-borne illnesses in recent years, Congress passed the FSMA in 2010 to update the nation's food safety laws. The bill was signed into law in early 2011, and the U.S. Food and Drug Administration (FDA) has begun writing rules to govern the way foods are grown, harvested and processed. The FDA has divided the rulemaking into several different issue areas, each with its own set of details and timeline.

In February, as part of a settlement agreement with consumer groups, the FDA agreed to implementation due dates for when the new rules will go into effect. The agreement extends and staggers the final rule deadlines beyond the June 2015 deadline set by the U.S. District Court of Northern California last year. In exchange, the agency will drop its Ninth Circuit appeal in the dispute with the two consumer groups.

For more information on the various due dates, ranging from Aug. 30, 2015 to May 31, 2016, go to the FDA's website at:
http://r20.rs6.net/tn.jsp?f=001Pk1XXTikIHv_G8YtsjRNjJbkRu6dCAihbvYIU-Pz0jSvSsXFW6ZvA7QWgWs3q1K0I9P6z7rVqt6eAEd_irEI3uu4k2RNVMG94yypxkFn8uOJ1P_x9e7usQbvspu11l-G_XDpfCexbSzMex1THNj72hyebqx8t3rld0YqejQsZuPgvQxsfNKBmXFDjq6hydd23Ux5k1NC_n_a2eUTyERp7DEMLyvSrSkRQ&c=D_bJdf-zWtAO0HTN7O8a4Uq2e39jZVWmZERJDNxMz9WpluJiqHhCXg==&ch=gLFSADAYL048m-JEf4KdrSfBxrl49egGocyp4LyOrCNkGEC_R4Hnw==

Many farmers and ranchers in Washington remain concerned about the impact of a gargantuan and expensive set of new regulations. The new rules cover such issues as preventative controls for human and animal food, imported food and foreign suppliers, produce safety, food transportation, intentional adulteration of food, and the potential requirement that irrigation water meet drinking water standards.

In comments submitted last year to the FDA, Washington Farm Bureau urged that any new rules adopted be practical and not impose any undue hardships on farmers.

"Agriculture is the largest employer in our state, providing more than 160,000 jobs and accounting for 13 percent of the state's economy," WFB wrote. "Exports alone count for at

O'Donnell, Mary Beth



EP 16#0267

From: LaRocque, Linnea on behalf of Barnes, Ed
Sent: Tuesday, September 02, 2014 8:45 AM
To: O'Donnell, Mary Beth
Subject: nonconforming lots

Follow Up Flag: Follow up
Flag Status: Flagged

for your file

From: Carol Levanen [<mailto:cnldental@yahoo.com>]
Sent: Monday, September 01, 2014 2:39 AM
To: Fred Pickering; Madore, David; Mielke, Tom; Barnes, Ed; Carol Levanen; Susan Rasmussen; Leah Higgins; Rick Dunning; Rita Dietrich; Jerry Olson; Fred Pickering; Jim Malinowski; Frank White; Benjamin Moss; Lonnie Moss; Melinda Zamora; Nick Redinger; Curt Massie; Marcus Becker; Clark County Citizens United Inc.
Subject: Re: nonconforming lots

Thanks Fred,

In addition, while looking through old documents, I found there were proposals that 2.5 acres or smaller had to have fire sprinkling systems, and hook up to CPU water if they were 1500 feet within a 'line. This was multiplied with more lots, times 750 feet. So, a 4 lot short plat area would be required to hook up if the distance was 3000 feet. As long as there is a non-conforming lot ordinance, the potential for abuse by the county is great. In looking through the large collections of maps in my newly created county map book, I noted that there is so much inconsistency among all of the maps, that they are basically useless. But, they all consistently show that the rural area has a massive number of small parcels and we know that the majority of them were created long before the GMA.

Best Regards, Carol

From: Fred Pickering <fredp@yacolt.com>
To: Carol Levanen <cnldental@yahoo.com>
Sent: Sunday, August 31, 2014 12:32 AM
Subject: nonconforming lots

A good meeting and talks the other night.

After thinking a little overnight and taking a quick looking at the code there are several restrictions that jump out.

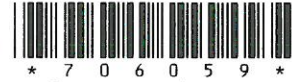
The 40 and 80 acre timber zones have 50 foot set backs. It can be hard to meet these on narrow lots. A 100 foot lot leave you no place to build. New lots in a forest zone need to be 140 feet wide. Which leaves you a 69 foot spot to build on.

A 5 acre zone set backs are (20) feet, and fifty (50) feet for accessory buildings (barns)

A 2.5 acre zone set backs are ten (10) feet, and fifty (50) feet for accessory buildings (barns)

So 2.5 acre lots in a forest zone has a much greater set back requirements than it would if it was zoned right. For some reason there are more restrictions on other usages such as B&Bs in a forest zone have to be smaller than in forest zones than it would in a 2.5 zone.

O'Donnell, Mary Beth



CP16#0268

From: Euler, Gordon
Sent: Tuesday, September 02, 2014 8:00 AM
To: O'Donnell, Mary Beth
Cc: Orjiako, Oliver; McCall, Marilee
Subject: FW: Comp Plan EIS scoping comments
Attachments: Clark Co Comp Plan EIS scoping Food System CARE 1Sept 2014.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Mary Beth:

For the index:

Gordy

From: Jude Wait [<mailto:info@foodsystemcare.org>]
Sent: Monday, September 01, 2014 4:43 PM
To: Euler@foodsystemcare.org; Euler, Gordon
Subject: Comp Plan EIS scoping comments

Gordy,

Comments attached.

Respectfully submitted,

Jude Wait
Food System CARE <info@foodsystemcare.org>

Food System CARE co-convened a task force to pursue immediate and long term food system strategies. Our goal is to facilitate greater support for sustainable food production agriculture and community resilience in Clark County's food system.

Clark County food system stakeholders are endeavoring to retain and increase local food production and sourcing in a region with significant food insecurity and development pressure (Clark_County_Food_System_Council, 2012; Public_Health, 2012). Initiatives to influence the Clark County Comprehensive Growth Management Plan update process motivated us to coalesce and activate now. Indeed the Food System Council has already submitted documents to the County (Clark_County_Food_System_Council, 2013), and we agree with their content and intent, including the handout from the Open House Scoping sessions (hereby additionally included as Scoping comments).

1. Public scoping comments are due on Labor Day 2014—after Scoping “Open House” meetings on August 20, 21, 28, 29 provided the public an opportunity to learn from County Planning staff about the issues and alternatives. The purpose is “to define issues related to the comprehensive plan update that will be addressed in the draft SEIS (Supplemental Environmental Impact Statement). **The comment period was way too short between information sessions and due date.**
2. We will interact with the Comp Plan Update process as it proceeds. For instance, we will provide input to the official record on the revised Comprehensive Plan and the revised (and/or Supplemental) EIS to be released by the County.
3. Given the changes in the system since 2007, we recommend the old documents be scrutinized for accuracy and applicability. How well were the impacts of the huge GMA expansion predicted? What has transpired since 2007? There is new information in reports produced since then, but they too are outdated now (Berk_Consulting, 2012; Gilroy, 2008; Globalwise_Inc, 2007; Meter, 2008; Moser, 2010). Furthermore, the actual impacts on the agri-food system, such as farm and home foreclosures, land sales, conversions to other uses, etc., should be investigated. What is really going on with Current Use taxation designations?
4. Within the County planning context, we support maintaining and enhancing the “long term commercial significance” of the agricultural sector as directed under the Growth Management Act. However, we suspect the County has fallen tragically short on their intent to meet the mandate. Farmland has been lost across the County, in part through conversion to other land uses, and incorporating viable farmland into the UGA without acknowledging the importance of ongoing urban and urban-interface agriculture. As the nature of agri-food system commerce has changed over recent decades—with an upsurge in local and direct marketing strategies, a greater variety of operational scales and diversified cropping, for examples—we would offer a broad inclusive definition of “commercial” and “significance.”

- Gilroy, A. (2008). Exploring the Clark County Food System: a food system assessment sponsored by Steps to a Healthier Clark County, Community Choices, and Clark County Public Health, for the Clark County Food System Council.
- Globalwise_Inc. (2007). Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington.
- Meter, K. (2008). Finding Food in Clark County (Presentation).
- Moser, C. (2010). Clark County Equity Report. Vancouver: Washington State University.
- Public_Health. (2012). Growing Healthier: Planning for a healthier Clark County.
- Rural_Lands_Task_Force. (2010). Rural Lands Task Force Recommendations: Clark County Board of Commissioners.

O'Donnell, Mary Beth



CP16#0269

From: Euler, Gordon
Sent: Tuesday, September 02, 2014 8:12 AM
To: O'Donnell, Mary Beth
Cc: Orjiako, Oliver; McCall, Marilee
Subject: FW: Input for scoping for 2016 GMP
Attachments: FOCC-Input for Scoping for GMA 2016.doc

Follow Up Flag: Follow up
Flag Status: Flagged

Mary Beth:

For the index:

Gordy

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

From: Sydney Reisbick [<mailto:reisbicks@comcast.net>]
Sent: Monday, September 01, 2014 7:46 PM
To: Euler, Gordon
Subject: Input for scoping for 2016 GMP

Greetings Gordy:

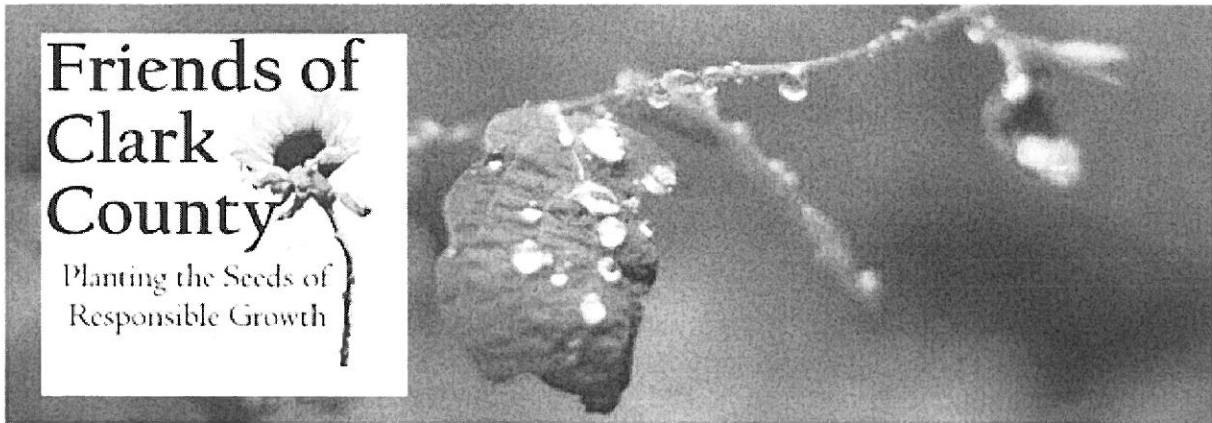
Good day to you. As you can see, this note and its attachment was sent in on Monday, Sept 1. We cannot send this comment letter through the website. Only 500 characters (not words) are allowed. This is very strange and unusual! As you see, the attached letter from Friends of Clark County has many more than 500 characters.

We expect you to accept the attached below and put it in the record. As a board, we have done a lot of thought and work to make it clear and concise and do want it submitted.

Note: This is different from my personal input.

Thank you for your time and consideration,

Sydney Reisbick, President
Friends of Clark County



Scoping for Growth Management Plan EIS for SEPA: From

Friends of Clark County
PO Box 513
Vancouver, WA 98666

Please consider the following in the EIS for the 2016 GMP SEPA.

Friends of Clark County supports GMP options that do the following.

Sustainable, adequate clean water for all uses.

Allow development only if there is available water, already State code.

Hold that there must be sustainable available water.

Where possible, consider senior water rights.

Storm water:

Control storm water and remove pollution before putting it into waterways.

Control or store storm water in "recharge areas" that return water to aquifers.

Foster keeping natural wetlands rather than engineered (concrete) ones.

Working agriculture and forestry:

Reserve the best lands for agriculture and forestry.

Continue "right to farm". Allow roadside stands.

Do not de-designate lands without fulfilling all state required criteria.

Parks and Trails.

Provide for sufficient parks and places for children to play.

Discourage the development of housing complexes that lack places for children to play. Older people also need natural areas as well, for their mental wellbeing.

Link the parks and green spaces by trails and/or bike lanes.

O'Donnell, Mary Beth



CP16-0270

From: LaRocque, Linnea on behalf of Barnes, Ed
Sent: Tuesday, September 02, 2014 8:44 AM
To: O'Donnell, Mary Beth
Subject: EIS - This information to be placed into public record

Follow Up Flag: Follow up
Flag Status: Flagged

In case you don't have this one yet. I don't think it's a duplicate.

Linnea LaRocque, Administrative Assistant
Clark County Board of Commissioners
360-397-2232
PO Box 5000, Vancouver WA 98666



SAVE PAPER - Please do not print this e-mail unless absolutely necessary

From: Carol Levanen [<mailto:cnldental@yahoo.com>]
Sent: Friday, August 29, 2014 6:11 PM
To: Madore, David; Mielke, Tom; Barnes, Ed; Carol Levanen; Susan Rasmussen; Leah Higgins; Rick Dunning; Rita Dietrich; Jerry Olson; Fred Pickering; Jim Malinowski; Frank White; Benjamin Moss; Lonnie Moss; Melinda Zamora; Nick Redinger; Curt Massie; Marcus Becker; Clark County Citizens United Inc.
Subject: EIS - This information to be placed into public record

Dear Commissioners,

Clark County Citizens United, Inc. is researching EIS documents from the 1994 Comprehensive Land Use Plan, which was rolled over to the 2004 Plan, which was rolled over to the 2007 Plan, and is now being considered for the 2016, 20 year update of the GMA Comprehensive Land Use Plan.

On page 11-10 of the **DRAFT SEIS June 15, 1994** the draft discusses **RURAL**.

It states, "**Clark County appointed a Rural and Resource Lands Advisory Committee which reviewed existing lot patterns and land uses in rural and resource lands and developed recommendations for which areas should be designated for resource use and which should be rural. These land use recommendations are reflected in this alternative. They did not recommend lot sizes for rural areas, those were developed by staff.**"

It further states, "**Resource Lands Advisory Committee recommendations, Clark County staff developed minimum lot sizes for Resource lands;.....**"

Oliver Orjiako was misinformed regarding who decided what the parcel sizes would be for rural and resource lands and the record needs to reflect that. The June 2014 Memorandum forwarded to the commissioners will need to be corrected to reflect what actually happened and is recorded in the June 15, 1994 Draft SEIS.

O'Donnell, Mary Beth



CP16#0277

From: Orjiako, Oliver
Sent: Tuesday, September 09, 2014 1:47 PM
To: O'Donnell, Mary Beth; Cook, Christine
Cc: Euler, Gordon; Alvarez, Jose
Subject: FW: Memorandum to the Commissioners - Information to be placed in the public record

Follow Up Flag: Follow up
Flag Status: Flagged

Just FYI. Mary Beth for index.

From: Madore, David
Sent: Tuesday, September 02, 2014 12:52 PM
To: Orjiako, Oliver
Subject: FW: Memorandum to the Commissioners - Information to be placed in the public record

FYI.

From: Carol Levanen [<mailto:cnldental@yahoo.com>]
Sent: Wednesday, August 27, 2014 10:46 PM
To: Madore, David
Subject: Fw: Memorandum to the Commissioners - Information to be placed in the public record

----- Forwarded Message -----

From: Carol Levanen <cnldental@yahoo.com>
To: David Madore <david.madore@clark.wa.gov>; Tom Mielke <tom.mielke@clark.wa.gov>; "ed.barnes@clark.wa.gov" <ed.barnes@clark.wa.gov>; Carol Levanen <cnldental@yahoo.com>; Susan Rasmussen <sprazz@tds.net>; Leah Higgins <leahnwhomes@gmail.com>; Rick Dunning <ralan1953@gmail.com>; Rita Dietrich <billrita@pacifier.com>; Jerry Olson <wcolsons@tds.net>; Fred Pickering <fredp@yacolt.com>; Jim Malinowski <j.malinowski@ieee.org>; Frank White <firfarmer@yahoo.com>; Benjamin Moss <benjaminmoss@johnlscott.com>; Lonnie Moss <lon@moss-wriston.com>; Melinda Zamora <mzamora1001@gmail.com>; Nick Redinger <nickredinger@hotmail.com>; Curt Massie <cmassie331@gmail.com>; Marcus Becker <marcusb35@msn.com>; Clark County Citizens United Inc. <cccuinc@yahoo.com>
Sent: Friday, August 22, 2014 10:14 PM
Subject: Memorandum to the Commissioners - Information to be placed in the public record

Clark County Board of Commissioners August 22, 2014

P.O. Box 5000

Vancouver, Washington 98666

For the Public Record

Re: June 26, 2014 Memorandum from Oliver Orjiako, Director of Community Planning, regarding Resource Land Designations

The memorandum to the commissioners begins with a statement that Clark County Citizens United, Inc. says the county should "revisit....parcel sizes of one and 2.5 acres that were in effect prior toadoption of the first Comprehensive Plan under the Growth Management Act.

CCCU's position is that existing parcelization be recognized in a zone that reflects predominant parcel sizes. Currently, almost 100% of rural lots in Clark County are substandard to their designated zone. Even though there are hundreds of one

acre parcels throughout the county, CCCU is recommending that a one acre lot size be reserved for a cluster ordinance in all zones.

Mr. Orjiako indicates his report is a "revisit of the records from approximately 1993 to 1998 relating to designation of resource land and rural parcel size. He mentions an appeal to the Superior Court and Clark County's responses to the appellate rulings.

Mr. Orjiako failed to mention the 1999 ruling from the Washington State Court of Appeals that states, "Based on the foregoing, we conclude that the GMA does not require counties to use the OFM's projections as a cap on non-urban growth. The Board exceeded its authority, and the trial court did not err in reversing the Board's ruling. In that reversal, the Superior County states that

" It is evident the rural land use density regulations were driven in part by earlier Growth Management Hearing Board Decision requiring urban population plus rural population to equal Office of Financial Management population forecasts....This formulaic view of the GMA requirement is fatally flawed. There is no requirement in the GMA that the OFM projections be used in any manner other than as a measure to ensure urban growth areas are adequately sized and infrastructure in those growth areas is provided for. This Board decision, however, compelled the County to downzone substantial portions of the rural areas in order to meet the Boards apparent requirements.

The only requirement for rural areas in the GMA is that growth in rural areas not be urban in character. While the GMA contains no restrictions on rural growth, it does require a variety of residential densities. By trying to comply with the board's errant decision the County violated the GMA planning goal.

Through no fault of the County's, the Board had an end in sight and disregarded the GMA's mandate in applying an unauthorized formula to the review of the Clark County Comprehensive Plan land use densities. The board's interpretation was erroneous and the County's decision to follow the Board's lead was unfortunate. The result is a plan that gives little regard for the realities of existing rural development in direct contradiction of the terms of the GMA."

In essence, the Court of Appeals upheld all of the passage of the OFM language as it identifies and relates to both the Superior Court and the Court of Appeals decisions.

Mr. Orjiako discusses the 1993 creation of the Rural and Natural Resource Lands Advisory

Page 2 of 5

Committee, and indicates that the 1993 Forest Focus Group and the Farm Focus Group were direct sub committees of that creation.

The Rural and Natural Resource Lands Advisory Committee was not part of the actual Focus Groups. Two of CCCU's Board members, Fred Pickering and Dan Dupuis, were on the original Forest Focus Group and one of CCCU's members, Don Kemper, was on the original Farm focus Group. CCCU has extensively interviewed these people to get an accurate accounting of what happened during their tenure. They confirmed their work followed the GMA guidelines contained in the WAC Chapter 365-190, but insist that a few days prior to submitting their recommendations to the county, an attorney, John Karpinski and Planning Director, Jerri Bohard, approached the groups and introduced a packet of different recommendations. The result was massive downzoning of all of the resource and rural lands, which was very different than what the focus groups intended. Members of those groups gave public testimony protesting those changes

Mr. Ojiako discusses the response of the Farm Focus Groups report and the criteria used. The memo to Jerri Bohard of October 25, 1994 was made after the submittal of the report. The Forest Focus Group issued its' report on December, 5, 1993. In addition, the Department of Community Development decided to require the use of the private forest land grading system from the Department of Revenue, which was not a criteria within the GMA.

In RCW 36.70A 050 Guidelines to classify Agricultural, forest and mineral lands and critical lands. it states, " *The department shall consult with the Department of Agriculture regarding guidelines for Agriculture lands, the department of Natural resources regarding forest lands and mineral resource lands. (2)...the department shall consult with interested parties, including but not limited to(a) cities.....(b) counties.....(c) developers...(d) builders....(e) owners(f) environmental organizations...(h) special districts...(i) state agencies (j) Indian tribes.. In addition, ...public hearings....the public input obtained at such public hearings. (4) The guidelines....regarding classification of forest lands shall not be inconsistent with guidelines adopted by the Department of Natural Resources.*

The report further states "the Rural and Natural Resource Lands Advisory Committee (not the focus groups) began the process of designating Agri-Forest for areas north of the East Fork of the Lewis River. The process was completed by staff.....

This committee was not part of the Focus Groups and was not part of the original work of the groups. But, it was given the power, with the help of staff, to designate virtually all of rural Clark County, and particularly 35,000 acres of Agri-Forest resource lands. Craig Greenleaf, Planning Director, attempted to justify the designations by claiming the committee selection process left "*land inappropriately considered*", ...*the farm focus group did not include heavily forest lands, role of soils...found to be uniformly of high quality, and "long term commercial significance" lead to severe difficulty in defining agriculture lands*

" Instead, he allowed unknown persons, to the public, to determine the outcome of these rural lands.

The memorandum then discusses the 67 appellants and CCCU's issues. Three items regarding designation of ag resource land, agri-forest resource lands and forest resource land were noted.

Page 3 of 5

It followed with the September 9, 1995 GMHB ruling.

Clark County Citizens United, had many other issues in the appeal and only agriculture lands designation was dismissed. But, Justice Poyfair made comment during the hearings that he believed the agriculture designations did need further review by the county, but there was not enough evidence in the record to rule against the designation. The appeal decision included numerous Findings of Facts and Conclusions of Law stated here:

#3

- *Statutory Mandate - The Board is not above the law....*; **#4 Agri-Forest Lands - The agri-forest resource designations violate the GMA .; **Additionally**, failure to solicit meaningful public participation....violated the public participation provisions of the GMA ; #6 - Comprehensive Plan EIS - The County failed to comply with SEPA's requirement...regarding the agri-forest designations **and** changes to the pattern of rural development was clearly erroneous. (These are two separate items). #7 - rural Land Densities - The County's rural and resource development regulations are inconsistent with the GMA.....requires a variety of residential densities and housing types, ...by identifying pre-existing small development patterns in rural areas **and** creating rural activity centers with a variety of rural densities. (These are two separate items); * There is no requirement in the GMA that the OFM projections be used in any manner other than as a measure to ensure urban growth areas are adequately sized and infrastructure in those growth areas is provided for. The County's decision to follow the Board's lead was unfortunate. **The result is a plan that gives little regard for the realities of existing rural development in direct contradiction of the term of the GMA.****

The discussion then goes to the Superior Court appeal and the subsequent April 4, 1997 ruling.

It states, "*The EIS issued by the county was in violation of the SEPA because the agri-forest designation was disclosed subsequent to the publication of the Final EIS*"*The county put together two task forces, one to deal with agri-forest and the other with rural centers.*

The 35,000 acres of agri-forest didn't have an EIS applied to it in 1994, and even though task forces were formed to address the court ruling and change the parcel sizes and designations, the actual land mass that was affected, has never gone through an EIS.

The report mentions that "*Staff...recommended elimination of rural centers due to...OFM forecasts...*

The courts ruled that it was illegal to use OFM projections to eliminate the rural centers. But, It is interesting to note that in response to planner, Peggy Scolnick's request for recommendations to the Comprehensive Plan, attorney, John Karpinski issued on March 16, 1994, the "**CCNRC Green Alternative Details**". He states, "*As you know, CCNRC's Green Alternative has four elements: (1) reduced Urban Growth Boundaries; (2) enhanced Ag and Forest land protections; (3) increased Critical Land protection; (4) vigorous rural development limitations.*"

In item III, C. he directs the county to "*Substantially reduced or eliminated "rural activity centers". He "thanks the County's apparent consideration of including this alterative as a full and complete alternative in the Growth Management DEIS."*

Mr. Orjiako states that in CCCU's court issues of land use densities in rural areas.....,"more than seventy percent (70%) of the properties in rural areas are non-conforming", and noted the

Page 4 of 5

"Comprehensive Plan which basis its' land use densities strictly on OFM populations projections, ...disregard its' adopted framework plan policies"*plan that ignores existing conditions in rural areas....do not comply with the requirements of State Environmental policy Act. But, then discusses that the GMHB stated there was no evidence in the record to support 5 acre minimum parcel size.....*

This is like putting apples and oranges together in the same basket. The Courts and the Hearing Board are two different agencies and the court ruled the Hearing Board was wrong and "not above the law". The court did not support the Hearing

Board decision and told the Board to remand all of the illegal and incorrect items noted in the court ruling, back to the county to correct. That has never happened. But with little change, the Board validated the plan anyway.

This report discusses that in the April 1997 ruling....the Superior Court states that the county needed to provide a variety of rural densities to be compliant with the GMA, and that could be achieved by designating rural centers as envisioned in the community Framework Plan. , Specifically, it states the court said "The eradication of the rural activity centers violates the planning goal requiring a variety of residential densities".

This is not what the ruling said. It does say the county needed to provide a variety of rural densities. But, it does not say that the designation of the rural centers can be used to achieve that goal. Unfortunately, the county has combined what the ruling does say, into one action. The ruling states, "*One of the planning goals requires a variety of residential densities and housing types,....met by identifying pre-existing small development patterns in rural areas ...and....creating rural activity centers with a variety of rural densities....*"

The word "and" in this sentence means, "*as well as, or, in addition to*", according to Webster's College Dictionary. The decision language was written by CCCU attorney, Glen Amster, and the intent of that sentence was confirmed further on in the decision, where justice Poyfair states, "*The result is a plan that gives little regard for the realities of existing development in direct contradiction of the term of the GMA.*"

In the report it says that "to comply with the Superior Court ruling, the BOCC convened a 13 member task force which in March 1998 reported it's recommendations..... There were two minority reports issued by members of the task force....the other recommended five to ten acres zoning similar to the 1980 Plan.

CCCU, Inc. Board members, Carol Levanen and Jim Malinowski were on that task force. At the first meeting of the group, commissioner Betty Sue Morris was in attendance and gave the order that the group could not consider any parcel size less than five acres. Even though many members thought 2.5 acres was appropriate, given the existing parcels, they were bound to the five, ten and twenty acre designations. But, the group was lopsided to the no-growth side. Whenever a pro-growth member was absent, the opposition took advantage of the situation and designated parcels in large lot zoning, regardless of the criteria and existing conditions on the ground. If there was a large parcel, it was locked up. There was so much of this activity, that the pro-growth group members simply couldn't sign their names to such a process. This resulted in the drafting of a minority report. The no growth members then drafted their own minority report, in

Page 5 of 5

response to the first one, thus resulting in the two reports.

In the Summary, it states that "*regarding resource designations, both the GMHB and the Superior Court decisions affirmed the county's designations as compliant with the GMA. The Ag 20, FR 40 FR80 in place today are the same as adopted in 1994 and upheld by both the GMHB and the Superior Court. It also states that "The updates of 2004 and 2007....readopted the previous land use actions.....*"

This statement is only partially true. The GMHB affirmed the designations as compliant, but the court did not weigh in on the changes and it would have taken another court action to involve the courts in the process again. When the original appeals were filed against the Plan, the Hearing Board rolled all of the resource land appeals into the one Agri-Forest appeal filled by CCCU. There were numerous appeals regarding agriculture and forest resource lands, but none of those other appeals were heard by the Hearing Board or the courts. The Hearing Board followed their own lead, regardless of the reprimand and directives from the court, and enabled the county to create a plan that does not reflect the court decisions. The county continues to use the OFM projections to plan rural areas and continues to ignore the existing development patterns and existing parcels.

It is unfortunate that the hearings board is the avenue by which remands travel, because in Clark County's case, "**The result is a plan that gives little regard for the realities of existing rural development in direct contradiction of the term of the GMA.**"

Clark County Citizens United, Inc. was told by the Board of Commissioners and staff that rural lands were not being considered in the 2004 and 2007 updates. CCCU was given directions by the county, not to submit any testimony for the purpose of discussing the rural lands. Regardless of the directives, CCCU did provide public testimony over rural lands concerns and the EIS. But, in reviewing a copy of the 2004-2007 Clark County Comprehensive Land Use Plan, given to CCCU at the time, to a current copy, it's clear that additional pages have been added to the Rural and Resource Element of the Plan to include language regarding the equine community. In addition, the current Plan is much larger than the same Plan distributed in 2004 - 2007.

Clark County Citizens United, Inc has waited long enough for the county to comply with the law. Since 1999, the Clark County Board of Commissioners, has promised that those corrections will be made with each update, but it has never happened. Instead, the county has formed many advisory councils, focus groups and "studies" to justify the Plan, to assure that the changes never will be made and the law can continue to be ignored. The public has no idea that any of this land use activity has taken place since 2004, because it has been disguised within a legitimate county agency. CCCU urges the county to honor the court mandates and GMA and make necessary corrections and changes to rural lands in the 2016 Clark County Comprehensive Land Use Plan.

Sincerely,

Carol Levanen, Ex. Secretary

Clark County Citizens United, Inc.

P.O. Box 2188

Battle Ground, Washington 98604

O'Donnell, Mary Beth



CH1680278

From: Orjiako, Oliver
Sent: Tuesday, September 09, 2014 4:05 PM
To: Euler, Gordon; Alvarez, Jose; O'Donnell, Mary Beth
Cc: Cook, Christine
Subject: FW: BERK - for the record

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

From: Madore, David
Sent: Tuesday, August 19, 2014 2:15 PM
To: Orjiako, Oliver
Subject: FW: BERK - for the record

fyi

From: Carol Levanen [<mailto:cnldental@yahoo.com>]
Sent: Tuesday, August 12, 2014 8:14 PM
To: Madore, David; Mielke, Tom; Barnes, Ed; Carol Levanen; Susan Rasmussen; Leah Higgins; Rick Dunning; Rita Dietrich; Jerry Olson; Fred Pickering; Jim Malinowski; Frank White; Benjamin Moss; Lonnie Moss; Melinda Zamora; Nick Redinger; Curt Massie; Marcus Becker; Clark County Citizens United Inc.
Subject: BERK - for the record

Dear Commissioners,

Today, August 12, 2014 CCCU gave testimony regarding the hiring of the BERK consulting firm and voiced CCCU's disapproval. Our research of this group gave us very good reason for doing so. One of the many reasons was submitted into the record to the hearing clerk. It consisted of two additional maps from the BERK rural lands study. One map depicted supposed agriculture land and supposed crops growing on those lands. These illustrations were not correct. In addition, they did not take into account prime ag soil in their review. The other map depicted forest resource in an area that has no forest soils. Reports were given over this resource in these areas that were also incorrect. Their "scientific" source was the Washington State Agricultural Department, which is only a marketing organization in the state, and the other "source" was BERK 2011, the very consulting firm who publishes the report. In fact most of the "source" for the BERK studies came from BERK itself. Where they got the information is anyone's guess and not mentioned, nor is credit given to the authors.

A consulting firm is to collect credible and scientific data and put in into some type of usable form to determine actions and outcomes. Bias subjectivity has no place in these types of paid studies. CCCU believes the county would have been much better served, if it had hired a different firm, that came to conclusions and recommendations via credible reports and scientific data.

Sincerely, Carol Levanen, Ex Secretary
Clark County Citizens United, Inc.