



April 3, 2015

Councilor Tom Mielke, Chair
Councilor David Madore
Councilor Jeanne Stewart

Subject: April 14, 2015, hearing on EIS alternatives and adjusted growth assumptions for the Clark County Comprehensive Plan.

Honorable Councilors:

On behalf of the cities of Clark County, we offer the enclosed testimony for the April 14 hearing. We appreciate the opportunity for input.

EIS Alternatives

As cities we support including Alternative 3 to evaluate the cities UGA proposals, and do not object to having some form of a rural alternative. However, the extent of rural changes envisioned in Alternative 4 raises significant concerns about impacts to cities in this process and beyond:

- Alternative 4 was originally discussed as simply recognizing existing lots, but County data indicates it would allow for future creation of 11,006 more new rural and resource building lots than could be created under current zoning.
- A significant portion of this growth would be adjacent or near to existing urban areas, impacting cities in two ways: In the short term, it would add to the demand for roads, schools, and other public services within urban areas; in the long term, it would create small parcelization that could prevent or limit future urban development for jobs or other purposes.
- From a process standpoint, including Alternative 4 as envisioned would add significantly to the time and cost of the upcoming EIS review and Comprehensive Plan update. Including it in the EIS will also create widespread community expectations that something similar be adopted.
- Adopting Alternative 4 as envisioned could pose substantial legal risk to the overall Comprehensive Plan update. It allows widespread density increases on resource lands

and rural lands next to them, which appears inconsistent with the past emphasis by the Courts in Clark County on resource land protection.

Some of these concerns impact Clark County more directly than cities, but as partners and neighbors in this adoption process, cities will not be immune. We urge the Board to consider the following adjustments:

EIS Recommendations:

- 1) *To avoid precluding efficient future urban growth, only include properties 1 mile or more from existing UGAs in Alternative 4.*
- 2) *To make Alternative 4 consistent with its stated vision of recognize existing legal lots, only include properties which were segregated before 1994 in the Alternative. Segregation information is readily available from assessor data and can be easily incorporated into the mapping.*
- 3) *Ensure that the EIS analyze the full range of Alternative 4 impacts to public services, as well as the following as required by law:*
 - a) *Impacts to adjacent cities - WAC 197-11-060(4)(b)*
 - b) *Long as well as short term impacts -WAC 197-11- 060(4)(c)*
 - c) *Consideration of similar impacts from other current projects also calling for rural intensification, such as the proposed Rural Industrial Land Bank, and proposed removal of limits on the number of employees in rural home occupations. - WAC 197-11-060 (3)(b)*

Growth Forecasts and Assumptions

The cities continue to support Board's overall objectives stated throughout this process of emphasizing jobs over housing growth, and of keeping cities "whole" by not forcing unrequested reductions or expansions of Urban Growth Areas (UGAs) beyond the site specific UGA changes the cities have proposed. We support the new modest adjustment to the original growth forecasts and allocations proposed by staff, *provided* that they continue to support these objectives, as we understand they are intended to do.

However, we oppose more fundamental changes to the assumptions, such as requests to increase the countywide population forecasts to match the past 50-year trend, or to significantly increase the assumed amount of residential lands needed for infrastructure. These or other changes that increase residential land supplies beyond the current proposal are not technically warranted, would undermine the jobs priorities you have set, and would impose unwanted UGA changes on the cities. Please refer to our November 2014 correspondence for

documentation. Overall, we believe the updated assumptions proposed provide sufficient amounts of land for local jurisdictions to fully accommodate growth.

Assumptions Recommendations:

- 1) *Adjust growth forecasts and allocations as necessary to maintain consistency with city proposals for expanding/maintaining UGAs*
- 2) *Avoid larger changes in assumptions which undermine jobs goals or force unrequested UGA reductions or expansions.*

We again appreciate the opportunity for input, and the inclusive process that you and your staff have led. The cities do have concerns about the process in which Alternative 4 has been developed in recent weeks. Some of this may be a result of the difficulties in expanding what had been a concise Comprehensive Plan update process focused on jobs and a handful of site specific UGA changes, and then grafting onto it widespread density changes throughout the rural area. As noted in Board discussion at the March 11 worksession, there is no requirement that rural changes be completed by June 2016, as there is for the urban changes. As the process moves forward, we respectfully request you consider options for decoupling the two processes.


Sincerely,



City of Battle Ground

City of Camas

City of La Center


City of Ridgefield
City of Vancouver

City of Washougal


City of Woodland