

Comments on the Draft Environmental Impact Statement
September 29, 2006

Clark County Community Planning
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Submitted By:
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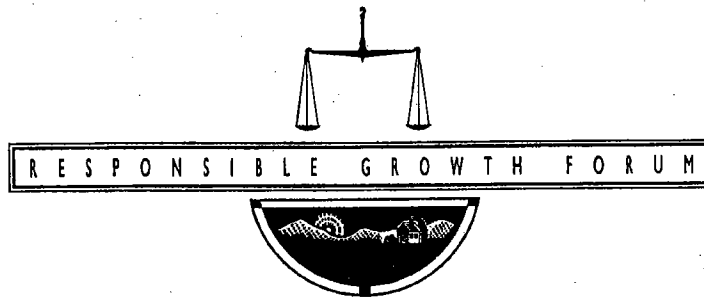
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Board of County Commissioners,

Attached you will find Critical Lands report, created by Jerry Olson and submitted to the board on June 20, 2006. It details the approximate 7,000 acres of critical lands planned to be converted and developed. This report may reflect out-of-date data, as newer information has not been available.

Sincerely,

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Board of County Commissioners,

Attached you will find the Responsible Growth Forum's response to the Draft Environmental Impact Statement. We appreciate this opportunity to outline our member's concerns and look forward to working with you on these issues in the future.

The Responsible Growth Forum exists to provide a unified voice for a livable and prosperous future for Clark County. We believe in advocating sensible, balanced growth through responsible planning and encourage our members to educate contributors, decision makers and the community at-large on issues relating to growth in Clark County.

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POPULATION PROJECTION

In July 2005 both the Portland Tribune and the Oregonian reported that Metro revisited its regional growth projections and found that more than 300,000 people had come to the region over the previous ten year than previously projected. They estimated that the projections used would ultimately underestimate actual population growth in the region by 500,000. This included a projection that an additional 220,000 thousand people would be in Clark County by 2030 where as previously they projected on 145,000 new people. This gross underestimation contributes to the under sizing of capital facilities.

And because of this evidence and continued evidence of growth more than 2% annually, we believe that the County should select a population growth projection of 2.2% to better reflect the actual rate of growth we have experienced over the past thirty years. While we understand that the growth rate will eventually lower as the real population number increases, we believe that projecting a lower than actual growth projection raises serious implications for the under sizing of capital facilities and other necessary public services.

CRITICAL LANDS

The plan should use the best GIS mapping available for making critical lands deductions and stick with it. There will be parcels that become buildable via map changes, conversion permit, or mitigation. However there will also be a compensating number of parcels that will only be encumbered when the scientists visit the site and map the resource. There are also unmapped critical lands such as cliffs, old growth, white oaks, threatened species, etc.

As an example, the Hockinson B soil type around Battle ground, when found with Dollar Soils, mostly tests as a wetland in the field. These soils do not show up as hydric or critical in the VBLI.

The plan assumption that 50-80% of critical lands will convert is just a glaring error. This adds up to 7,000 acres for Alternative 2 and there is no discussion of adverse impact of either the 7,000 acres of conversion or the 20,000-30,000 acres of mitigation needed. (See separate report).

Remove the 50-80% conversion assumption and add enough land to the UGB to create the housing and jobs that were erroneously assumed to happen on critical lands.

JOB DENSITY

The Responsible Growth Forum believes it is in the best interest of Clark County to create enough land to accommodate the total number of jobs outlined in the Growth Management Plan Assumptions.

We also recommend that a sufficient supply of "shovel-ready" land be made available for the short-term, as defined by a recognized authority. Also, an available 3,000 acres of vacant industrial land should be made readily available to attract potential industries looking to relocate to Vancouver or expand existing operations.

In the current plan, we believe that there is not enough land outlined for jobs to accommodate these goals. (Page 189)

According to the Draft EIS, a significant area of land will be zoned as Business Park. This designation is not popular in today's market and should be minimized to make room for more desirable zoning, such as Light or Heavy Industrial. MH and ML would allow for warehouse distribution and heavy manufacturing jobs, which typically carry higher wages and more popularity in this region.

Job densities in The Plan Monitoring Report cannot be used as a tool to predict the achieved densities. The numbers and projects, represented in this report, are not based on *real* numbers and *real* projects. Which leads us to believe the job densities achieved have been overstated.

As business members of this community we believe the stated densities of nine jobs per acre (Industrial) and twenty jobs per acre (Commercial and Business Park) will not be achieved.

The Port of Vancouver has prepared a Master Plan, detailing the correct number of jobs generated from their area of jurisdiction. We recommend using the numbers stated in this report, instead of those represented in the VBL inventory for the Port. We would also recommend that the Port job numbers only include direct positions, not indirect and induced positions.

OVERRIDES

Members of the Responsible Growth Forum were present when the County Commissioners considered the overrides presented by the city. Since that day, to our knowledge, the city has failed to produce documentation to support these overrides. We believe that some specific projects would warrant an increase in job density, but these increases need to be averaged out with those projects that will deliver less job generation than the standard. The net result will still be less than 9 or 20 jobs per acre. (Page 189)

After reviewing the Public Sector jobs, it would appear that no documentation exists to support the 7,944 public jobs represented in this EIS. We believe that at the time of adoption, only jobs created in existing, exempt pieces of property should be accounted for as public sector jobs. (Page 189)

INFRASTRUCTURE

In order to achieve the calculations for accommodating population and jobs on vacant buildable property, the infrastructure must be subtracted and the acreage must be reduced to a net number. Infrastructure includes streets, freeways, storm facilities, schools, parks, churches, open spaces, etc.



The Building Industry Association has conducted tests to show that the amount of infrastructure streets and storm facilities represented on residential plats is equivalent to 27-30%. With parks, schools and churches adding another 10-15%, the assumption stated in the DEIS of a 27.5% infrastructure deduction is inadequate.

Jerry Olson, has previously submitted maps showing the present Urban Growth Boundary of Vancouver contains 45% infrastructure.

If the Western Washington Storm Water Manual were to be adopted, tests show that 25% of sites would be used solely for storm water facilities.

We recommend increasing the infrastructure deduction to the 38% level where it was in the 1994-2003 Comp Plan.

MIXED USE

In order to achieve the most use out of Mixed Use Zoning, plan designations should be applied where it makes sense for those uses to exist. Generally, the market determines how appropriate a site is for a particular use. Mixed Use designations require that the site be desirable for at least two uses and at predetermined densities. There are very few locations where both commercial uses and high-density residential uses are preferred on the same site. For this reason, we believe that the amount of land zoned Mixed Use should be minimized and localized in high-density areas. A more effective zoning plan would limit Mixed Use designations to C3 and CH zoned parcels as a voluntary overlay or as a mitigation tool, both in very urban areas.

WATER AND SEWER

If Alternative 1 and 2 have the same amount of population and jobs, why are the water and sewer demands greater in Alternative 2? (Page 245)

SCHOOLS

If the proposed new population and new jobs are the same for all alternatives, why are there 12 new schools and 2 new expansions planned for Alternative 2 versus Alternative 1? And, in Alternative 3, 10 new schools and one expansion have been outlined as required infrastructure in addition to those required in Alternative2. Please explain.

If Alternative 1 will be accommodating much of the new population in the Vancouver and Evergreen School Districts, why only one school addition per district? It would appear that more schools would be needed to accommodate greater student populations. (Page 230)

BRIDGE TRANSPORTATION ALTERNATIVES

The remarks on the bridge transportation alternatives are designed to encourage future examination of a light rail line into Clark County.

1. It has already been established through the River Crossing Committee that a 3rd bridge would be too costly to build. The current estimate would be in excess of 6 billion according to Doug Ficco from WDOT.
2. The 3rd bridge was effectively removed as a planning policy by Governor Barbara Roberts in December 1995, when the "Westside Bypass:" (3rd bridge to CC) was removed as a planning option by the state.
3. The DEIS assumes that if a feasible third bridge cannot be built, light rail mass transit will be a necessary component of Clark County's traffic infrastructure program.

Instead of concentrating on a one billion dollar bridge (Columbia River Crossing), our members believe that the analysis should be broadened to include other important infrastructure improvements within Clark County. We believe the projects listed below are just as important to the economic health of Clark County as the Columbia River Crossing project:

I-5

- 139th St. interchange
- 179th St. interchange
- 269th St. interchange
- 319th St. interchange

I-205

- Mill Plain interchange
- Burton Road interchange
- St Johns interchange

In order to preserve the economic vitality of this region and to allow for growth in this community, the projects listed above require proper federal funding for project completion. As business owners and citizens, we feel as though the current planning process is focused solely on one project- the Columbia River Crossing. If the CRC project is approved and the federal freeway infrastructure funds go to it, where will we get money to pay for the above listed interchange improvements? We believe that the County needs to closely examine all options, ensuring the right dollars go to the right projects. To achieve this goal, the county needs to expand the scope of the DEIS to identify and prioritize our regional funding needs for transportation along our interstate corridors.

HIGH CAPACITY TRANSIT

While high capacity transit does not appear to be a major consideration or option identified in the DEIS, page 213 does propose as potential mitigation that "if there are no realistic highway corridor connections, the other option for increasing cross-river



capacity would be high capacity transit (HCT)." While studying such options may be warranted, it should not preclude other studies evaluating the return on investment of public dollars for a new high capacity transit system for commuters versus improving or expanding interchange capacity on highways of statewide significance for employment lands. With limited federal and state dollars to provide improvements, the public investment may be better spent in improving interchange capacity. Studies evaluating the possibility of HCT should include such considerations.

TRANSPORTATION

According to the DEIS there appears to be a shortfall of revenue to support necessary capital improvements. We believe that the projected revenues grossly underestimate the amount of revenue received from the state over a twenty year period. For instance it is hard to believe that only \$134,328,184 will be received in grants over a twenty year period. That is only \$6,716,409 per annum in grants.

Furthermore, we believe that the impact fee revenue over a twenty year period will also be significantly more.

URBAN RESERVE

Before any land is placed into Urban Reserve, the Responsible Growth Forum would like assurance that enough land has been allocated, within the proposed boundary, to accommodate the projected jobs. Once this need has been confirmed, it would be acceptable for additional land to be designated as Urban Reserve.

In conclusion, the Responsible Growth Forum believes all of Alternative 2 should be adopted, along with as much of Alternative 3 necessary to accommodate for our concerns outlined above, which include adequate provisions for housing and jobs, an increase in infrastructure deductions and the elimination of the assumed critical land conversions.