

**Wiser, Sonja**

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**From:** Tim Trohimovich <Tim@futurewise.org>  
**ent:** Tuesday, February 23, 2016 3:49 PM  
**To:** Cnty Board of County Councilors General Delivery, Cnty 2016 Comp Plan  
**Subject:** Comments for Rural Industrial Land Bank Public Hearing  
**Attachments:** Futurewise Comments on Rural Industrial Land Bank for BOCC Public Hearing Feb 23 2016 pdf; RILB Vicinity Google Earth 2015 Images for Emailing pdf

Dear Sirs and Madams:

Enclosed please find Futurewise's comments on the proposed Rural Industrial Land Bank for the Board of County Councilors March 1, 2016 public hearing and enclosures. Please contact me if you need anything else.

**Tim Trohimovich, AICP**  
Futurewise | Director of Planning & Law  
816 Second Avenue, Suite 200 | Seattle, Washington 98104  
p 206 343.0681 Ext. 118  
Email [tim@futurewise.org](mailto:tim@futurewise.org)

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Protecting the land*

February 23, 2016

The Honorable Marc Boldt, Council Chair  
Clark County Board of County Councilors  
PO Box 5000  
Vancouver, Washington 98666-5000

Dear Council Chair Boldt and Councilors Madore, Mielke, Olson, and Stewart:

**Subject: Comments on the proposed Rural Industrial Land Bank for the Board of County Councilors March 1, 2016 public hearing.**

Sent via email to: [boardcom@clark.wa.gov](mailto:boardcom@clark.wa.gov); [comp.plan@clark.wa.gov](mailto:comp.plan@clark.wa.gov)

Thank you for the opportunity to comment on the proposed Rural Industrial Land Bank. We urge the Board of County Councilors to deny the Rural Industrial Land Bank because it is unneeded and will pave over working farmland.

Futurewise is working throughout Washington State to create livable communities, protect our working farmlands, forests, and waterways, and ensure a better quality of life for present and future generations. We work with communities to implement effective land use planning and policies that prevent waste and stop sprawl, provide efficient transportation choices, create affordable housing and strong local businesses, and ensure healthy natural systems. We are creating a better quality of life in Washington State together. We have members across Washington State including Clark County.

**The Rural Industrial Land Bank is unneeded because land suitable to site the major industrial development is available within Clark County's existing urban growth areas and therefore the Rural Industrial Land Bank violates the Growth Management Act (GMA)**

The Growth Management Act (GMA), in RCW 36.70A.365(2)(h), provides that one of the requirements for a "major industrial development" is that "[a]n inventory of developable land has been conducted and the county has determined and entered findings that land suitable to site the major industrial development is unavailable within the urban growth area." RCW 36.70A.367(2)(b)(i) applies this requirement to major industrial developments with master planned locations. The *Addendum* identifies land suitable for major industrial development in the existing urban growth areas.<sup>1</sup> Consequently, the Rural Industrial Land Bank cannot be approved at this time

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<sup>1</sup> *Clark County Rural Industrial Land Bank Programmatic Environmental Review pursuant to RCW 36.70A.367(2)(b), and Addendum to the Clark County Comprehensive Growth Management Plan Final*

and, therefore, a Rural Industrial Land Bank on any of the non-urban growth area sites will violate the Growth Management Act.

### **There is enough land in the County's UGAs to accommodate the County's planned residential and job projections**

The most recent *Clark County Buildable Lands Report* documents that there is more than enough land in the County's urban growth areas (UGAs) to accommodate the County's planned employment growth. The *Clark County Buildable Lands Report* states:

In 2014, the Board of County Commissioners chose to plan for a total of 91,200 net new jobs. The County has an estimated capacity of 101,153 jobs as follows: The 2015 VBLM [Vancouver Buildable Lands Model], indicates a capacity of 76, 978 jobs. The cities of Battle Ground, La Center, and Ridgefield, have indicated they have additional capacity to accommodate 16, 755 jobs. Publicly owned land is not included in the model, therefore we assume that the 7,400 new public sector jobs estimated by ESD [State of Washington Employment Security Department] will occur on existing publicly owned facilities.<sup>2</sup>

So there is no need for the Rural Industrial Land Bank. We recommend that the Board of County Councilors should deny this proposal.

### **The Rural Industrial Land Bank is unneeded because Commercial and Light Industrial is already located in this area**

Not only is there enough land in the UGAs, but Commercial and Light Industrial land is already located west and south of the proposed Rural Industrial Land Bank. The existing Vancouver urban growth area is also just south of the site. While this proposal is being sold on the grounds that rural residents could easily drive to jobs on the new site, there are already opportunities for jobs in this area. So again, the Rural Industrial Land Bank is unneeded.

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*Environmental Impact Statement* (October 2015) pages 13 and 14 of the *Addendum Part I. Inventory* accessed on Feb. 22, 2016 at: <https://www.clark.wa.gov/community-planning/rural-industrial-land-bank>. Hereinafter referred to as the *Addendum*.

<sup>2</sup> *Clark County Buildable Lands Report* p. 11 (June 2015) accessed on Feb. 22, 2016 at [https://www.clark.wa.gov/sites/all/files/the-gud/061015WS\\_2015BUILDABLE\\_LANDS\\_REPORT.pdf](https://www.clark.wa.gov/sites/all/files/the-gud/061015WS_2015BUILDABLE_LANDS_REPORT.pdf) and enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*

### **The proposed Rural Industrial Land Bank qualifies as agricultural lands of long-term commercial significance and should be conserved**

The proposed Rural Industrial Land Bank is Area VB from the County's illegal 2007 attempt to dedesignate this agricultural land.<sup>3</sup> Area VB was found to be illegally dedesignated by both the Growth Management Hearings Board and Clark County Superior Court.<sup>4</sup> The "County passed an ordinance redesignating parcels BC, VB, and the portions of parcels CA-1 and RB-2 that were not purportedly annexed, as [agricultural lands of long-term commercial significance] ALLTCS."<sup>5</sup> So this land qualified, and as the *Addendum's* analysis shows, continues to qualify as agricultural lands of long-term commercial significance.<sup>6</sup> And this land continues to have an Agriculture comprehensive plan designation.<sup>7</sup> The enclosed Google Earth images show in that proposed Bank Industrial Land Bank, outlined in red on two of the images, continues to be farmed and are many adjoining parcels.<sup>8</sup>

Agriculture has long-term commercial significance in Clark County. Income from farm-related sources is up sharply in Clark County, increasing from \$4.2 million in 2007 to \$5.98 million in 2012. This is an increase of 41 percent, a much larger percentage increase than the Washington State increase of 27 percent.<sup>9</sup> Between 2007 and 2013, the average market value of products sold per farm increased five percent from \$25,079 to \$26,367.<sup>10</sup> Clark County farmers rank second in Washington State in the number of "broilers and other meat-type chickens" they are raising.<sup>11</sup> The Clark County Food System Council reports that "in the past 5 years Clark County has seen an increase in the number of Community Supported Agriculture programs, growth in

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<sup>3</sup> See *Comprehensive Growth Management Plan NE Vancouver UGA – Map 1 Deliberation Components* and *Comprehensive Growth Management Plan NE Vancouver UGA – Map 2 Deliberation Components* enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*.

<sup>4</sup> *Clark Cnty. Washington v. W. Washington Growth Mgmt Hearings Review Bd.*, 161 Wn App. 204, 220, 254 P.3d 862, 868 (2011) *vacated in part Clark Cnty v. W Washington Growth Mgmt. Hearings Review Bd.*, 177 Wn 2d 136, 298 P.3d 704 (2013). This portion of the decision was not vacated

<sup>5</sup> *Id.*

<sup>6</sup> *Addendum Appendix B: Agricultural Lands Analysis* pages 7 – 10

<sup>7</sup> County/UGA Comprehensive Plan Clark County, Washington accessed on Feb. 22, 2016 at:

<https://www.clark.wa.gov/community-planning/maps>

<sup>8</sup> See the enclosed file "RILB Vicinity Google Earth 2015 Images for Emailing pdf"

<sup>9</sup> United States Department of Agriculture, National Agricultural Statistics Service, *2012 Census of Agriculture Washington State and County Data Volume 1 • Geographic Area Series • Part 47 AC-12-A-47 Chapter 2. County Level Data, Table 6 Income from Farm-Related Sources. 2012 and 2007* p 261 (May 2014) accessed on Feb 22, 2016 at:

[http://www.agcensus.usda.gov/Publications/2012/Full\\_Report/Volume\\_1\\_Chapter\\_2\\_County\\_Level/Washington/](http://www.agcensus.usda.gov/Publications/2012/Full_Report/Volume_1_Chapter_2_County_Level/Washington/) and a copy of *2012 Census of Agriculture Washington State and County Data Volume 1* was enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*.

<sup>10</sup> US Department of Agriculture National Agricultural Statistics Service, *2012 Census of Agriculture County Profile Clark County, Washington* p. \*1 accessed on Feb. 22, 2016 at:

[http://www.agcensus.usda.gov/Publications/2012/Online\\_Resources/County\\_Profiles/Washington/cp530\\_11.pdf](http://www.agcensus.usda.gov/Publications/2012/Online_Resources/County_Profiles/Washington/cp530_11.pdf) and enclosed with Futurewise's December 14, 2015, letter to the Clark County Planning Commission.

<sup>11</sup> *Id.*

the number of farmers markets, and more interest in locally sourced and organically grown food.”<sup>12</sup> So farming and ranching has economic benefits for Clark County.

Washington State Department of Agriculture's *Washington Agriculture Strategic Plan 2020 and Beyond* documents the need to conserve existing agricultural lands to maintain the agricultural industry and the jobs and incomes the industry provides.<sup>13</sup> As the strategic plan concludes “[t]he future of farming in Washington is heavily dependent on agriculture's ability to maintain the land resource that is currently available to it.”<sup>14</sup> The *Addendum* discloses that this land is current available to agriculture and in fact is currently being farmed.<sup>15</sup> Globalwise, Inc. concluded that “[o]ne of the key obstacles in Clark County is the limited access to high quality agricultural land at an affordable cost.”<sup>16</sup> As both this letter and the *Addendum* have documented, the site of the proposed Rural Industrial Land Bank is high quality agricultural land.<sup>17</sup>

The Rural Industrial Land Bank proposal is simply an attempted end run around the fact that this land qualifies as agricultural land of long-term commercial significance and so cannot be included in the urban growth area. We urge the Board of County Councilors to deny this proposal. If there was a needed to expand the UGA or provide sites outside the UGAs for major industrial developments, which there is not, there are sites that are not agricultural lands of long-term commercial significance that could be paved over.

### **The proposed Rural Industrial Land Bank qualifies as “Clark County's Best Farm Land” and should be conserved**

The Clark County Food System Council has identified all of the proposed Rural Industrial Land Bank and much of the land in its vicinity as “Clark County's Best Farm Land.”<sup>18</sup> The Clark County Food System Council identified this land “by looking at characteristics of the land that make it suitable for food production.”<sup>19</sup> These included

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<sup>12</sup> *Promoting Agricultural Food Production in Clark County*, A proposal developed by the Clark County Food System Council p 2 (November 2013) accessed on Feb. 22, 2016 at.

<https://www.clark.wa.gov/sites/all/files/community-planning/Planning%20Commission/2015%20Meetings/ESCProposalDraft.pdf> and enclosed with enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*.

<sup>13</sup> Washington State Department of Agriculture, *Washington Agriculture Strategic Plan 2020 and Beyond* pp 50 – 52 (2009) accessed on Dec. 14, 2015 at: <http://agr.wa.gov/fofi> and enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*.

<sup>14</sup> *Id.* at p. 50.

<sup>15</sup> *Addendum Appendix B Agricultural Lands Analysis* p. 37.

<sup>16</sup> Globalwise, Inc , *Analysis of the Agricultural Economic Trends and Conditions in Clark County, Washington Preliminary Report* p. 48 (Prepared for Clark County, Washington: April 16, 2007) and enclosed with the paper original of Futurewise's October 16, 2015 letter commenting on the *Addendum*

<sup>17</sup> *Addendum Appendix B Agricultural Lands Analysis* pages 7 – 10.

<sup>18</sup> *Promoting Agricultural Food Production in Clark County*, A proposal developed by the Clark County Food System Council p 4 (November 2013).

<sup>19</sup> *Id.* p 5.

soils with land capability 1 through 4 soils, land that is flat and rolling, lands that have at least four acres outside the buffers around stream habitats, and "lands that are currently zoned for agriculture or rural residences. .. [They] excluded lands that are tax exempt because they are owned by churches, land trusts, or governments."<sup>20</sup>

This is another reason that this land should be conserved. The Board of County Councilors should deny this proposal.

**The Addendum does not identify reasonable mitigation measures and so violates the Washington State Environmental Policy Act (SEPA) and the Growth Management Act (GMA)**

An environmental impact statement (EIS), including an addendum, must identify reasonable mitigation.<sup>21</sup> The GMA, in RCW 36.70A.365(2)(a), requires that the "[n]ew infrastructure is provided for and/or applicable impact fees are paid ..." for the Rural Industrial Land Bank. But the *Addendum's* discussion of mitigation measures on page 26 of the *Addendum Part II: Alternative Sites Analysis* includes no information on how the new infrastructure will be provided or how the impact fees the county charges will be updated to include the considerable costs of the needed infrastructure. Nor are any systems development changes discussed for providing water and sewer service is not available at this site.

Similarly, RCW 36.70A.365(2)(f) requires that "[p]rovision" must be "made to mitigate adverse impacts on designated agricultural lands, forest lands, and mineral resource lands[.]" But again, the *Addendum* does not include this required mitigation. Given that these properties are agricultural lands of long-term commercial significance and are adjacent to agricultural lands of long-term commercial significance this is a significant deficiency.

The failure to identify mitigation violates both the Washington State Environmental Policy Act (SEPA) and the GMA. This is other reason the Board of County Councilors should deny the Rural Industrial Land Bank.

Thank you for considering our comments. If you require additional information please contact me at telephone 206-343-0681 Ext. 118 and email [tjm@futurewise.org](mailto:tjm@futurewise.org)

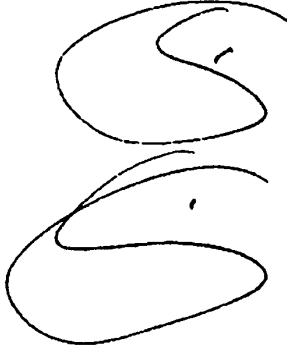
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<sup>20</sup> *Id*

<sup>21</sup> WAC 197-11-440(6)(a).

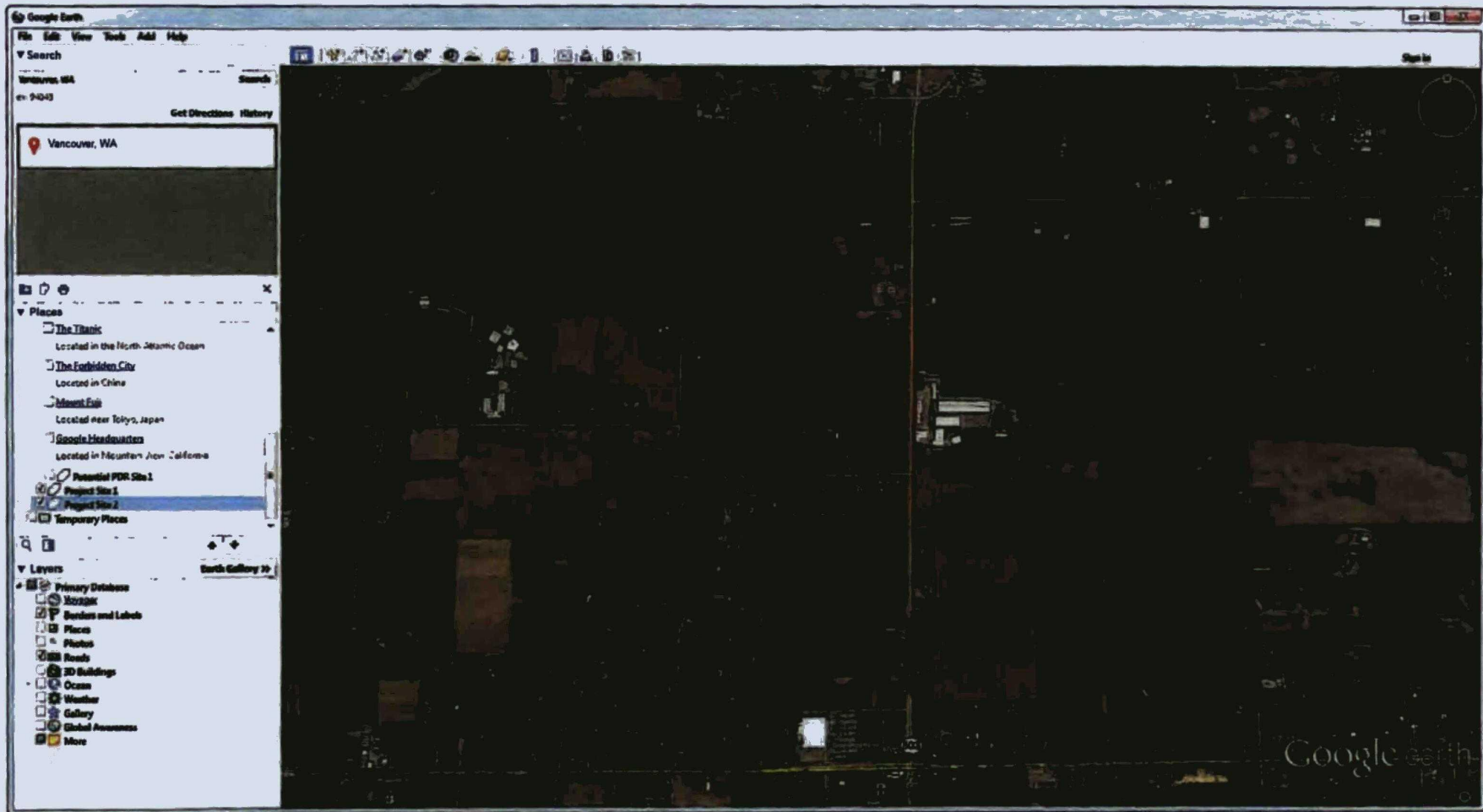
Board of Clark County Councilors Subject: Rural Industrial Land Bank Comments  
February 23, 2016  
Page 6

Very Truly Yours,

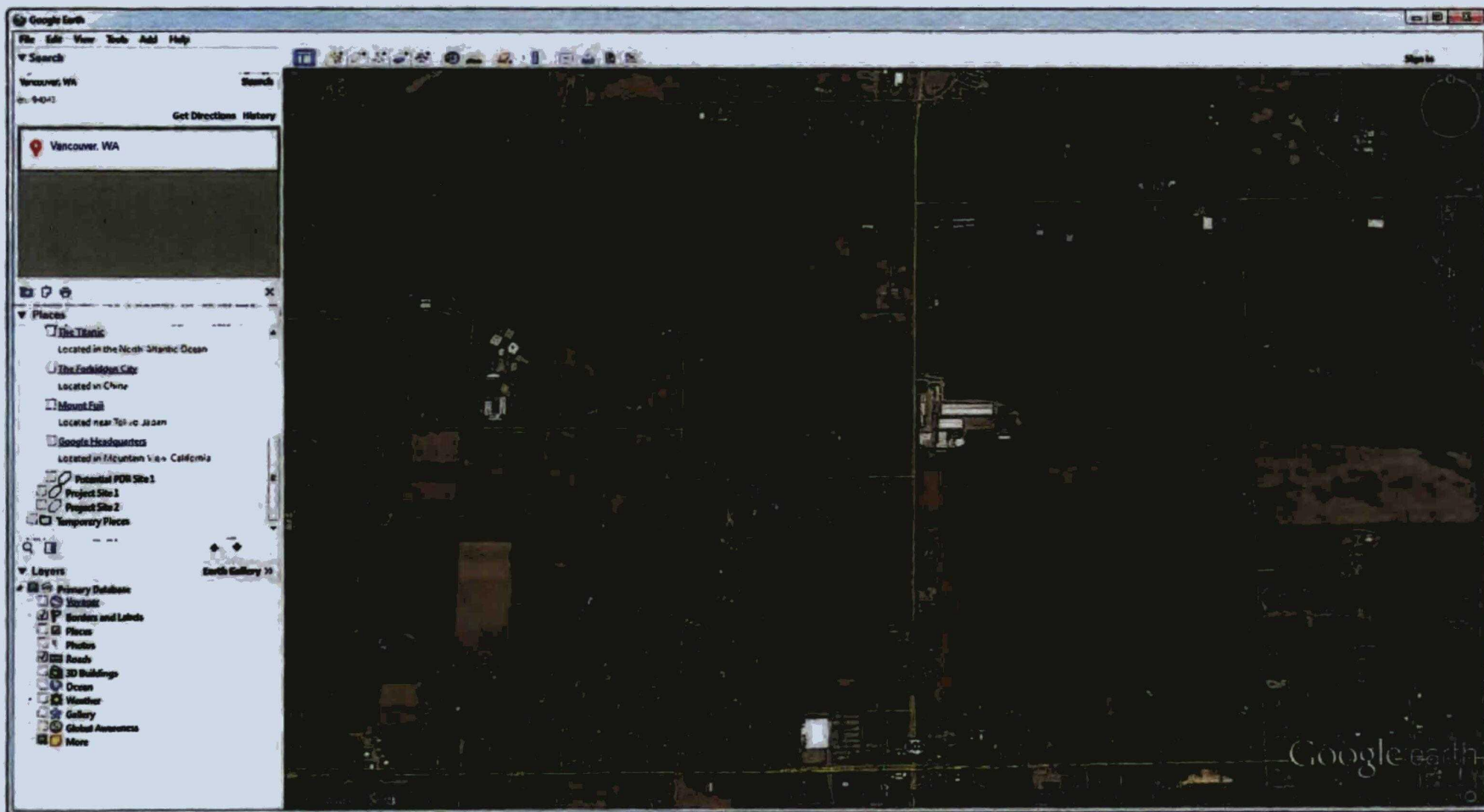
A handwritten signature in black ink, consisting of two stylized, overlapping 'S' or 'T' shapes.

Tim Trohmovich, AICP  
Director of Planning & Law

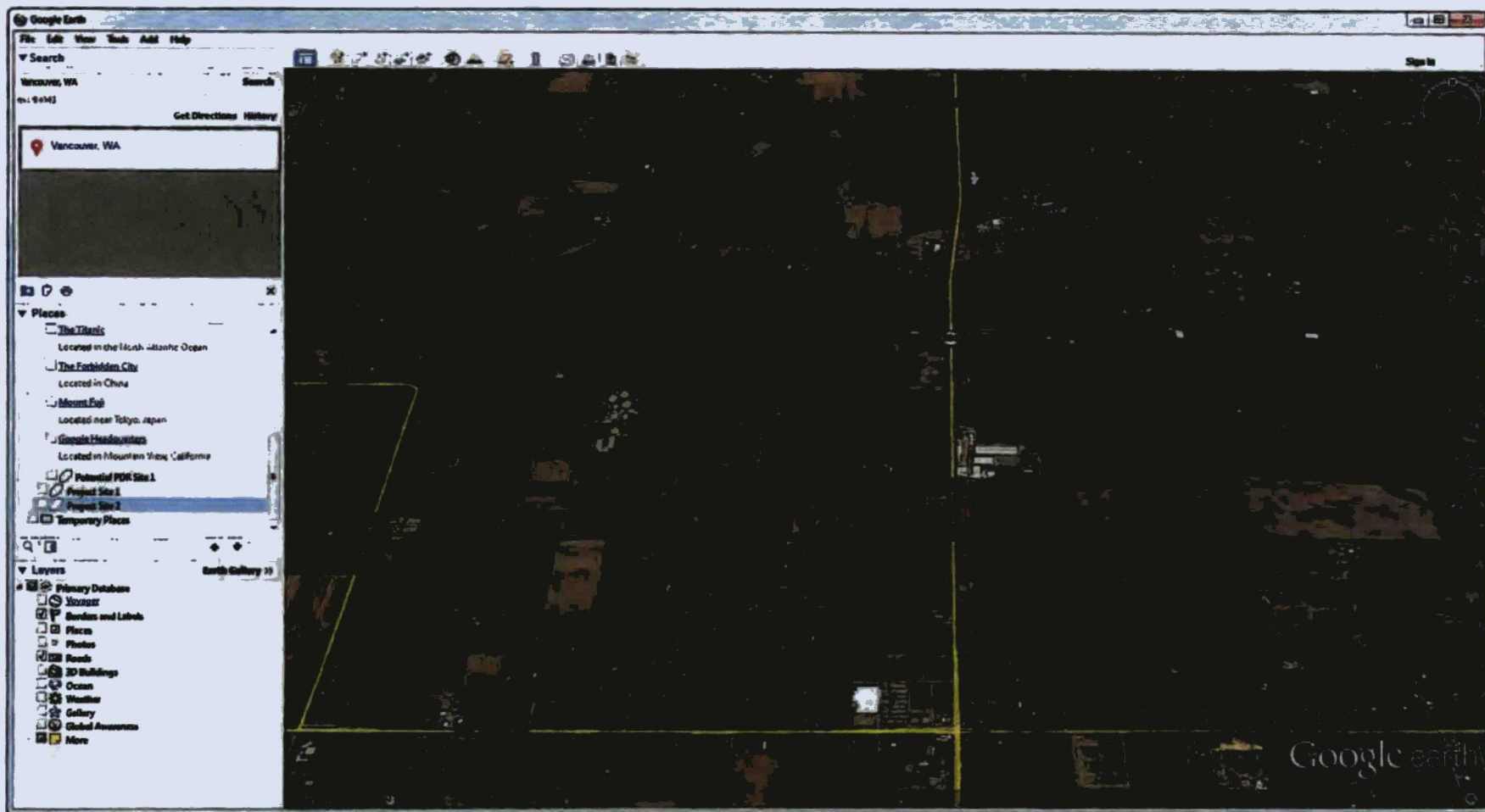
Enclosures











March 7, 2016

Mr Gordy Euler, Planner III  
Post Office Box 9810  
Vancouver, Washington 98666-9810

RE Proposed amendment to establish a Rural Industrial Land Bank pursuant to RCW  
36 70A 367

Dear Mr Euler:

Thank you for sending Growth Management Services the proposed amendments to Clark County's comprehensive plan and development regulations that we received on Jan 28, 2016, and processed with Material ID No 22047 We understand this process was initiated by a request from private landowners to consider designating their property as Rural Industrial Land Bank (RILB) We have reviewed the proposed amendment, the EIS Addendum, consultant reports, public comments and other background materials found on the project website Please consider the following comments

**Rural Industrial Land Bank**

The criteria to establish RILB is found in RCW 36 70A 367 Clark County qualifies under the statute to establish a RILB and appears to have addressed the requirement to identify and evaluate alternative sites, including sites within the existing UGA The inventory (EIS Addendum, Part I), includes two sites within the UGA that met screening criteria These sites were subsequently combined for further analysis

One of the criteria used by Clark County was to identify only private land for consideration Commerce is curious about this as the Port of Vancouver holds a significant amount of vacant Industrial land, as noted in the Inventory report (*EIS Addendum, Rural Industrial Land Bank Inventory, Page 14*) The Port-owned site was not analyzed further as the other UGA sites were determined to be more ready for development We do not see any comment in the record from the Port on the RILB proposal We urge the County to provide documentation concerning the readiness of the Port site for development and documentation that they were consulted during the process

**Agricultural Resource Lands Analysis**

The proposal includes an agricultural analysis of the four non-UGA alternative sites under consideration for RILB designation (*EIS Addendum, Appendix B Agricultural Lands Analysis*) The analysis applies the criteria found in WAC 365-190-050 for designating Agricultural Resource Lands of Long-term Commercial Significance to the alternative sites and surrounding areas

While the report provides a detailed analysis of the agricultural designation criteria, it is difficult to find specific conclusions that the docket property, Site 1, should be de-designated from Agriculture to Light Industrial. The County states in a response to addendum comments that "the County will weigh GMA goals and the RILB analysis, as well as public comment, in its decision" (Page 9, Comment 2.9, *Response to SEPA Comments*). We cannot locate findings in any of the reports or in the draft Resolution submitted to Commerce for 60-day review that clearly states the reasons why the property is better suited for industrial use over agriculture. We encourage the County to establish a clear, defensible record with specific findings and conclusions.

Specific concerns we have concerning the de-designation analysis include the following:

1. Site 1 properties contain some of the best agricultural land in the County, 99% of which is considered prime farm land, with significant percentage of the land being Class 1 and 3 soils. The rate at which agricultural lands are being converted to other uses is alarming. According to a new analysis by the American Farmland Trust, 41 million acres of rural land has been permanently lost in the last 25 years to highways, shopping malls, poorly planned sprawl and other development. Of that amount, 23 million acres (an area the size of Indiana) was agricultural land. We urge Clark County to consider other sites such as the Port Property and save this 600 acres of prime agricultural land.
2. Site 1 has excellent access to rail and highway transportation facilities and is within close proximity to local markets. The fact that the current dairy operation does not sell milk locally does not discount the potential importance of this farm land to the County's future food security.
3. The report states that the existing dairy operation would like to relocate to Eastern Washington and that the dairy industry is declining. GMA rules clearly state that "the intent of the landowner to use land for agriculture or to cease such use is not the controlling factor in determining if land is used or capable of being used for agricultural production" (WAC 365-190-050(3)(i)). The report does not provide any analysis concerning the viability of other types of agricultural production on this property.

Thank you for the opportunity to comment on the proposal. If you have any questions or concerns about our comments or any other growth management issues, please contact me at 360 725 3056. We extend our continued support to Clark County in achieving the goals of growth management.

Sincerely,

Ike Nwankwo





**Washington State  
Department of Transportation**

Roger Millar, PE, AICP  
Acting Secretary of Transportation

Southwest Region  
11018 Northeast 51st Circle  
Vancouver, WA 98668-1709

360-905-2000  
Fax 360-905-2222  
TTY: 1-800-833-6388  
www.wsdot.wa.gov

March 24, 2016

RECEIVED

31 2016

Gordy Euler, Community Planner  
Clark County Community Planning  
1300 Franklin Street PO Box 9810  
Vancouver, WA 98666

Re: CPZ2014-00006 Lagler/Acklerland  
Rural Industrial Land Bank  
SR 503, MP 3.50

Dear Mr. Euler:

The Washington State Department of Transportation (WSDOT) appreciates the opportunity to coordinate with Clark County on this proposal. WSDOT reviews this proposed Rural Industrial Land Bank (RILB) with great interest, as it straddles SR 503. This highway is a congested corridor and every access point increases the risk of collisions. In order to maintain the safety and mobility of this corridor, it is important that access to SR 503 be managed. Therefore, the county arranged a meeting of county and WSDOT staff at WSDOT offices on July 1, 2015. Clark County was represented by Laurie Lebowsky, Gordy Euler, Matt Hermen and Carolyn Heniges. WSDOT was represented by Michael Williams, Dave Bellinger, Jeff Barsness and Ken Burgstahler. Clark County staff presented an overview of the RILB, discussed traffic circulation and modeling results.

WSDOT would like to note the following:

- As has been previously discussed, only one traffic signal will be permitted between the existing signals at NE 119<sup>th</sup> Street and NE 149<sup>th</sup> Street/NE Caples Road with this or any future development in this corridor. According to WAC 468-85-040(3)(b)(i), the minimum spacing is one-half mile. Therefore, the new signal should be at approximately NE 134<sup>th</sup> Street. A signal will not be permitted at NE 144<sup>th</sup> Street or NE 131<sup>st</sup> Street, so the road network being discussed now should also be able to accommodate any future development between NE 119<sup>th</sup> Street and NE 149<sup>th</sup> Street. As this corridor develops, left turns to and from the highway will be eliminated, either with centerline median curb or concrete barrier.
- WSDOT concurs with utilizing a parallel and gridded circulation system to provide alternative travel routes. This system should intersect SR 503 at the traffic signals.

- According to an email from the county's traffic consultant, Kittelson & Associates, the RILB will not create systemic capacity issues. However, the traffic modeling results appear to indicate otherwise. County staff and the consultant are reviewing this concern.
- The county and any applicant should be aware of stormwater issues. In particular, WSDOT has a stormwater easement through the Ackerland property (west of SR 503). The county's consultant has reached out to WSDOT to determine the location of this easement.

These comments are based on the meeting between Clark County staff and WSDOT, and are preliminary, only. As this proposal proceeds through the county review process and when proposed developments are brought forward for review, there may be need for additional information by this department for further review. There may be other issues and requirements by this department that are not stated here. Other issues or requirements may include, but are not limited to drainage, illumination, access, signing, and channelization. This review does not constitute final approval of any development of this property by WSDOT.

Thank you for meeting with us and providing the opportunity to comment on this application. WSDOT appreciates that Clark County staff has been responsive to the concerns of this department. If you have need of additional information, please contact Mr. Ken Burgstahler, Southwest Region Planning Office, at (360) 905-2052.

Sincerely,



Michael Williams  
Southwest Region Planning Manager

MW: kb

FROM: Residents of Clark County  
TO: Clark County Board of Councilors

As residents directly affected by the proposed Rural Industrial Land Bank we urge the Board of Councilors to recommend denial of the Rural Industrial Land Bank as it is proposed because of the adverse effects that this zoning change will have on our neighborhoods and community

## **OUR POSITIONS**

### ***The Rural Industrial Land Bank Will Degrade the Quality of Life for Local Residents***

The proposed Rural Industrial Land Bank will detract significantly from the quality of life of the residents in the area. In recent years several new housing developments have been built in our area, expanding our rural neighborhoods, and there are now hundreds of residences within and around the proposed industrial land bank (22 homes/farms on NE 132<sup>nd</sup> Avenue, 13 homes/farms along NE 144<sup>th</sup> Street, 24 along 117<sup>th</sup> (WA 503), 27 homes and 6 apartment buildings along 119<sup>th</sup> Street between 117<sup>th</sup> and 132<sup>nd</sup> Avenue, as well as two new subdivisions of over 100 single family residences off of 132<sup>nd</sup> Avenue less than a quarter of a mile from the proposed RILB). We enjoy walking or riding our bikes to Prairie Field to join our friends in watching and playing ball, children ride bikes and skateboards, and we walk with friends and our dogs, and go for jogs, especially along 132<sup>nd</sup> Ave. We live here because we want, and have had, relative peace and quiet, with less traffic, noise, or pollution than our urban/suburban counterparts.

### ***Paper Mills, Sawmills, and Concrete Factories Should Not Be Placed Within One Block of Residents***

As we examine the map of the proposed development within the zone, we are concerned with the possible types of industry that may be established within the designated industrial area. As we understand it, light industry is to have minimal noise and pollution (odor) standards, yet the list of possibly allowed manufacturing uses includes, for example, paper manufacturing, lime and gypsum product manufacturing, and other mineral product manufacturing. The odors from these types of industry are well-known and offensive. Also we note the additions of new roads and the expansions of existing roads through the zone. These roads, plants, and factories will increase the traffic, dust, noise, and air quality, and thus reduce the safety and enjoyment of our homes, and create dangers to pedestrian traffic along 132<sup>nd</sup> Avenue.



### ***The Rural Industrial Land Bank Will Decrease Property Values of Surrounding Homes***

Residents near the proposed Rural Industrial Land Bank are understandably concerned that their property values will decrease as a natural result of being located in the immediate vicinity of "light industry" and becoming less desirable as residential property. It is plausible that residents will demand compensation for their decrease in property values due to the implementation of this re-zoning and building. Additionally, despite the information provided at the February 17, 2016 meeting that states that there will be buffers provided between the development and adjacent rural areas, the map clearly shows that a large area of the development is directly across the street (which cannot be considered a buffer) from some of the current residents of 132<sup>nd</sup> Avenue.

### ***More Suitable Areas Have Been Identified for the RILB***

Not only is there enough land in the Urban Growth Areas, but Commercial and Light Industrial land is already located west and south of the proposed Rural Industrial Land Bank. The existing Vancouver urban growth area is also just south of the site. Additionally, other areas that have been identified in the limited inventory of suitable sites for light industry (such as Areas 2, 3, and 5) would not have the degree of negative impact on rural residents as the proposed site. The other RILB areas considered were not adjacent to several hundred residences. The currently proposed area is

### ***Establishment of The RILB Will Reduce/Destroy Prime Farmland***

This particular land bank is disruptive to residents' preservation of farmland for locally grown organic crops that benefit the health and prosperity of the community. The majority of the proposed Rural Industrial Land Bank is shown on most GIS maps as agricultural land, and Clark County farmers raise a variety of crops and livestock here that has contributed to the increase over the past five years of community supported agricultural programs in the county, including at least three family run farms in the immediate vicinity of the proposed industrial land bank (Botany Bay Farm, Larwick Christmas Tree Farm, and Brickhouse Farm). This "de-zoning" plan also eliminates one of the four remaining dairy farms local to Clark County.

### ***Concern for Preservation of Wildlife Habitat***

A final concern that we, as residents, have is in regards to the effect of this development on the existing natural habitats of the wild birds and animals in the area. Again, while there are apparent green spaces allowed as buffers to "mitigate the impact on resource lands," the development itself will drive wildlife away. The existing wildlife in the area is not all adaptable to wetlands, so the creation of more wetlands does not ameliorate the impact to birds and other animals that currently reside here.

***Recommendation***

We acknowledge that our area is desirable and that growth is inevitable, but we recommend consideration for more residential growth or even a business/tech park district rather than the proposed Rural Industrial Land Bank in this area. There is currently considerable growth adjacent to the RILB for single family housing and multifamily housing. This in itself makes the area unsuitable for industrial uses, but demonstrates that there are other viable and more suitable uses for this land. We also recommend that the Board of Councilors review the letter submitted to the Clark County Planning Commission from Tim Trohimovich of Futurewise dated December 14, 2015, and consider the information provided therein. Further, the residents submitting this letter respectfully recommend that the Clark County Board of Councilors reject the currently proposed location for the RILB.

Sincerely, in behalf of residents and neighbors,

Leslie A Washko & Frank Washko 14200 NE 132<sup>nd</sup> Avenue, Brush Prairie, WA 98606

Ana Vargas & Jose Vargas 12814 NE 132<sup>nd</sup> Avenue, Brush Prairie, WA 98606