

From: [Oliver Orjiako](#)
To: [Sonja Wiser](#); [Jose Alvarez](#)
Subject: FW: Councilors must look at displacement and equity from the rural point of view
Date: Tuesday, May 21, 2024 8:11:57 AM

Hi Sonja:

FYI and for the record. Thanks.

From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Sent: Monday, May 20, 2024 9:21 PM
To: Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: Fw: Councilors must look at displacement and equity from the rural point of view

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Clark County Council
P.O.Box 5000
Vancouver, Washington 98666

May 20, 2024

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN UPDATE

Re: Councilors must look at displacement and equity from the rural point of view

Dear Councilors,

Clark County Citizen United, Inc. see that despite opposition from thousands of rural citizens, that comprise the membership of Clark County Citizens United, County staff are not going to house rural generations within their cultures and communities. This is where they were raised, in familiar rural surroundings.. It appears they will be displaced into urban jurisdictions, mainly Vancouver. There was no meaningful public process regarding this policy decision, and no expanded SEPA review to analyze the social, cultural, environmental, health and economic impacts to those people. At minimum, rural citizens will be mentally and financially damaged by relocating away from their family and their culture.

These are essential resources that families rely on. All social, familial and cultural networks, that have been built over decades and generations, all help to support young families, older rural adults and people with special needs. This network for essential support, will be severely harmed and fragmented. Are the consequential losses associated with the removal of this rural support system, acceptable to agency staff? Where is the analysis that says that harm is expected and losses, cultural and economic degradations are always acceptable? It appears there is a policy in place, that grants approval for harm, because there are direct impacts resulting from inadequate, unaffordable rural housing for this community. This is where the work of the Comprehensive Plan update is proving to be reckless.

The membership of CCCU do not want our children and grandchildren to suffer displacement, and have to relocate out of familiar communities and the culture in which they were raised. Rural affordable

housing, for generations of our children, is threatened. Indeed, all rural housing is under attack and sacrificed for the need to preserve large lot zoning. How did the need to preserve large parcels of land, zoned 30 years ago, get elevated in stature above the *current and urgent* need for buildable rural parcels, to meet the demand for affordable housing? This concerns housing needs that impact the health, safety and well-being of rural citizens. How did the need to preserve large parcels of land, zoned 30 years ago, elevate large lot zoning above the health, safety and well being of rural citizens? This is reckless behavior.

Clark County Citizens United, Inc. suggests that the Council look at this from the perspective of a rural family that will be moved, against their will, to make a home in high density Vancouver. Imagine you are part of this family, wandering around an unfamiliar community, against your will, looking for childcare, social support and spiritual connections. Since their youth, everything the family knew had been imprinted in their memories. Everything a rural family could want was available within their knowing grasp. All that was known, all that was familiar is now being destroyed. Where do you call home? Where do you plant a garden? Where do the kids safely ride their cycles and quads? Where is the land to roam and explore on? Where do they keep their 4-H project animals? Their rural life is being destroyed and replaced with blacktop, traffic, high density, crowded places, pollution, and a criminal society. They will be forced to move into areas where people always lock their doors, close their curtains, and stay in their houses. That kind of life is foreign to rural people, and leads to depressions and mental illness.

Is this good for the displaced, relocated rural families? The answer is no.

Is this what the rural families want? Again, the answer is no.

Doesn't that matter?

A good analogy is like removing grizzlies from an old familiar range. They know where to hunt food and water. Everything a bear could want is available within their scope of knowledge. Then they are drugged, tagged with a tracking collar, and removed from their familiar habitat and dropped into the unfamiliar. Where's the water, other bears, berries, their home? The biologists know some won't survive and others will be damaged, when removed from their historic home range land. These are bears, not people, and are subject to the whims of policy changes that endure formal public scrutiny. However, the grizzlies get the added benefit of an expanded EIS. Not so with the planned rural displacement of thousands of rural people in Clark County, within the Comprehensive Plan.

The work of the Comprehensive Plan is not comprehensive when the need for rural housing *in rural areas* is not addressed. Displacement is not the best and only solution, but it's the only one being offered. The work is showing a reckless attitude and a lack of concern for the consequences of intentional actions. You must concede, it is shortsighted to deny and eliminate rural housing options. There's even more hubris, if one believes the intended displacement of rural families away from well acquainted communities, and forcing them to live in a high density urban environment, is in their best interests. The Clark County Council can and must do better.

Sincerely,

Susan Rasmussen, President

Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604

State Environmental Policy Act Determination of Significance and Request for Comments on Scope of Environmental Impact Statement Date of Issuance: May 15, 2024

Lead Agency: Clark County Agency Contact: Oliver Orjiako, Director Community Planning, Responsible Official Email: oliver.orjiako@clark.wa.gov Phone: 564.397.4112

Proposal Name: Clark County Comprehensive Plan Update 2025-2045 Description of Proposal: Clark County is in the process of updating the 2016 Comprehensive Growth Management Plan (Comprehensive Plan) **as allowed by the Growth Management Act (GMA)**. The GMA requires jurisdictions to periodically review and update, **if necessary**, their comprehensive plans and development regulations to bring them up to date with

- Changes to state law,
- Land use changes, if any,
- Population and employment growth projections, and
- Housing projections.

In addition, the cities of Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland, and Yacolt are also updating their comprehensive plans.

The EIS will evaluate the land use alternatives proposed for those cities in their updated comprehensive plans. The City of Vancouver intends to prepare separate environmental documentation for their plan update. This notice announces the County's intent to prepare an EIS on the proposed update to the Clark County Comprehensive Plan.

The environmental impact review process **under the State Environmental Policy Act (SEPA)** will be used to inform the public of the choices between the proposed growth alternatives.

The SEPA process requires that the County, as lead agency, notify the public of its intent to prepare an EIS so that citizens have an **opportunity to comment on the range of alternatives**, areas of impact, and possible mitigation measures to be examined in the EIS.

This notice discusses recent comprehensive plan-related decisions made by Clark County and describes the alternatives and scope of impacts analysis to be considered in the EIS. SEPA DS (WAC 197-11-360)

Page 2 of 4 Location of proposal:

The EIS will cover all of unincorporated Clark County, WA, and the cities of Battle Ground, Camas, La Center, Ridgefield, Washougal, Woodland, and Yacolt.

Proponent: Clark County is the proponent for the Comprehensive Plan update.

Determination:

Clark County, WA, has determined that **this proposal is likely to have a significant adverse impact on the environment.**

An environmental impact statement (EIS) is required under RCW 43.21C.030 (2)(c) and will be prepared consistent with Clark County Code section 40.570.050.

The lead agency has identified the following areas for discussion in the EIS:

Elements of the Natural Environment

Examples of topics that may be addressed in an EIS

Earth

Geology;

soils;

topography;

unique physical features;

erosion

Air

Air quality;

odor;

climate

Water

Movement/quantity/quality of surface water and groundwater; runoff/absorption;

floods; public water supplies

Plants and Animals Habitat for and numbers or diversity of species of plants, fish, or other wildlife; unique species; fish or wildlife migration routes.

Energy and Natural Resources Amount required/rate of use/efficiency;

source/availability; nonrenewable resources; conservation and renewable resources,

scenic resources

Elements of the Built Environment

Examples of topics that may be addressed in an EIS

Environmental

Health Noise;

risk of explosion;

releases or potential releases to the environment affecting public health,

such as toxic or hazardous materials

Land and Shoreline

Use Relationship to existing land use plans and to estimated population; housing;

light and glare; aesthetics; recreation; historic and cultural preservation; agricultural

crops; conformance with GMA

Transportation Transportation systems;

vehicular traffic; waterborne/rail/air traffic; movement/circulation of people or goods;

traffic hazards

Public Services and Utilities

Fire; police; schools; parks or other recreational facilities; maintenance;

communications; water/stormwater; sewer/solid waste; other governmental services

or utilities

Background and Purpose:

Clark County's Comprehensive Plan is the official document that establishes the goals, policies, and benchmarks to guide future development.

The Comprehensive Plan guides decisions about where housing and jobs will be located and where the County invests in transportation, utilities, parks, and other public assets. SEPA DS (WAC 197-11-360)

Page 3 of 4 The County's Comprehensive Plan must address state growth management goals and must be consistent with the County-wide Planning Policies as well as meeting the requirements of RCW 36.70A.

Since the County's Comprehensive Plan was updated in 2016, conditions in the county as well as state and federal laws may have changed, requiring corresponding changes to the Comprehensive Plan.

The Clark County Council adopted a 2045 projection of 718,154 persons and 269,000 jobs.

The new growth from 2023-2045 will require accommodating 103,698 housing units and 88,500 jobs.

The anticipated outcome of this EIS and comprehensive planning process will be adoption of an updated Comprehensive Plan for Clark County. The plan does not in itself entail construction or other physical actions. As a result, the analysis and description of the plan's impacts will not identify specific sites, but instead give an overview of the impacts that could be expected under the various planning alternatives.

The EIS will present information about the relative impacts of the alternatives described below.

SEPA rules acknowledge that less-detailed information is available on the impacts associated with the adoption of a comprehensive plan and allow the discussion of alternatives at a level of detail appropriate to the scope of the proposal.

SEPA also permits the adoption of other documents where appropriate as part of disclosing existing conditions and anticipated impacts. SEPA rules encourage discussion of alternatives as different means to accomplish a stated objective. The alternatives will be considered in light of their ability to accomplish the objectives of GMA and the objectives of the Comprehensive Plan and County-wide Planning Policies.

The County Council has identified a set of planning assumptions that will provide the basis for evaluating the potential impacts of the alternatives. Alternatives The EIS is required to identify and analyze alternative approaches to meeting the goals of a proposal. Analyzing and comparing different alternatives provides information for the public and assists decision-makers in selecting a preferred course of action.

The alternatives will include a No Action Alternative, required by SEPA, which will be based on the adopted 2016 Comprehensive Plan, with the existing urban growth boundaries, planning assumptions, policies, and implementing ordinances.

The EIS will evaluate additional alternatives based on updated assumptions and consistency with current legislation and direction from the County Council. The other alternatives will be different from the No Action Alternative. A preferred alternative will be developed based on public input, technical analysis, input from cities and tribes, and the results of the environmental scoping and analysis. SEPA DS (WAC 197-11-360)

Page 4 of 4 Scoping: Agencies, affected tribes, and members of the public are invited to comment on the scope of the EIS. **You may comment on alternatives, mitigation measures, probable significant adverse impacts,** and licenses or other approvals that may be required.

The method and deadline for giving us your comments are: Deadline for Comments: Comments will be accepted through **5:00 PM, June 5, 2024**. Mailed comments must be postmarked on or before June 5, 2024. Mailing address: Comprehensive Plan EIS Scoping Clark County Community Planning P.O. Box 9810 Vancouver, WA 98666-9810 Email address: comp.plan@clark.wa.gov

Online form: <https://clark.wa.gov/communityplanning/comp-plan-comments> In-person scoping open house events: May 28, 2024, Ridgefield High School, Commons, 2630 S Hillhurst Rd, Ridgefield, 7:00-8:30pm May 29, 2024, Vancouver Community Library, Columbia Room, 920 C St, Vancouver, 7:00- 8:30pm May 30, 2024, Battle Ground Community Center, Lewis River Room, 912 East Main St, Battle Ground, 7:00-8:30pm Comments must be submitted by: 5:00 PM,

June 5, 2024 RESPONSIBLE OFFICIAL: Oliver Orjiako, Director Community Planning PO Box 9810 Vancouver, WA 98666-9810 oliver.orjiako@clark.wa.gov 564.397.4112

Date: _____ Signature: _____ For other formats, contact the Clark County ADA Office at ADA@clark.wa.gov.