

Rec'd 6/26/18

CC'd = Council  
Orjako  
Wiser  
Record

**From:** susan rasmussen

**Sent:** Tuesday, June 26, 2018 9:29 AM

**To:** susan rasmussen

**Subject:** Testimony 2, 6/26/18

The elimination of all rural centers in the '94 plan did not come from the people. The elimination demonstrates just how detached from reality, ignorant of the patterns of development on the ground, how driven staff were to advance an agenda to stop all rural growth. That is the policy that drove the unlawful formula state in Superior Court rulings. That is why it was necessary to reinstate the rural centers.

Back in '97, it was a herculean effort to oppose the '94 plan that changed the rural landscape, along with our culture. Over \$260,000 was raised to oppose the plan and CCCU prevailed in the Courts. The Courts ruled time and again, the county's plan failed to follow the laws when it failed to acknowledge the patterns of development of the ground, and applied a formula to stop rural growth that eliminated the rural centers.

Proebstal, Dollars Corner, Duluth, Heisson, Felida, Sara, Chelatchie Prairie, Brush Prairie, Fern Prairie, Fargher Lake, Pioneer, Meadow Glade, Green Mountain, 5 Corners, Covington, Barberton, Glen Wood, Prune Hill, View, High Lands, Venorsborg, Summit Grove. All eliminated from existence to stop rural growth, stop jobs, stop rural housing; and drive the illegal formula.

Despite the court ruling in 1999, only a fraction have been restored. Doesn't this demonstrate the extreme lengths staff will take to preserve and advance the illegal formula. They are even willing to partially comply to court orders.

The county did not take this defeat well as compliance would have required dismantling the entire '94 plan and rid it of all evidence of the illegal formula. Instead of making court ordered corrections, staff began to shore it up. It has been advanced all these years with models that inaccurately indicate there is plenty of buildable land for housing and jobs; with population figures that fall way short of reality, with reports that indicate there is rampant obesity and we will suffer a shortage of healthy food. Wild accusations are supported in

reports funded by grant money. These reports are used as lobbying tools that slant your vision of policies.

Despite the comings and goings of various elected officials at the leadership, protecting the citizens from corruptions, the illegal formula remains like a virus, infiltrating all aspects of the plan in place today. This has damaged property rights, the lives and culture of a community. Thousands of families suffer impacts in the forms of unaffordable housing, disruptions to their culture, segregations from families, and are driven from where they grew up as if they were refugees. Regardless of how you feel about the people involved in our membership, the solution involves dismantling all aspects of the unlawful formula and full compliance to Superior Court Orders that locks up rural areas.

*for the public record of  
the Probstal Rural Policy  
Center.  
Susan Tomussen*

**From:** [Hermen, Matt](#)  
**To:** [Orjiako, Oliver](#); [Anderson, Colete](#)  
**Cc:** [Wiser, Sonja](#)  
**Subject:** FW: Reinstatement of the Proebstel Rural Activity Center  
**Date:** Tuesday, June 19, 2018 4:33:31 PM

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For the Proebstel Rural Center record...

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**From:** susan rasmussen [mailto:sprazz@outlook.com]  
**Sent:** Tuesday, June 19, 2018 4:21 PM  
**To:** Hermen, Matt; Rumpeltes, Jim; Stewart, Jeanne; Olson, Julie - Auto answer; Quiring, Eileen; Blom, John; Boldt, Marc  
**Subject:** Reinstatement of the Proebstal Rural Activity Center

For the public record of the Proebstal Rural Activity Center and the Planning Commission.

Clark County Citizens United, Inc. fully supports the efforts of the petitioners.

Clark County's history, our unique rural character, and CCCU's past court actions play important roles in supporting reinstatement of Proebstal as a rural activity center. Even though 31 historic communities provided goods and services to rural citizens, the county's first 1994 Comprehensive Growth Plan wiped them off the face of the earth. Even though the rural centers had historic value, played vital roles in rural culture, economies, and remain part of our rural character; all 31 rural centers were not acknowledged in the Plan.

Clark County Citizens United, Inc. challenged the legality of this action in the courts and prevailed. The court orders required the county to reinstate rural centers for GMA compliance. One clearly sees the county reinstated only a fraction of the LAMIRDS. The 2014 citizen petition is supported by local history, authentic rural character, and the 1997 Poyfair Remand from CCCU's Superior Court case No. 96-2-00080-2.

CCCU suggests all LAMIRDS be reviewed, in conjunction with the rural areas.

Respectfully submitted,  
Susan Rasmussen for  
Clark County Citizens United, Inc.

**SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY**

**NO. 96-2-00080-2**, APRIL 4, 1997, HONORABLE EDWIN J. POYFAIR

**FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

**FINDINGS OF FACT**

*Pg. 3, 5. The adopted Plan also eliminated an element of the Community Framework Plan, the concept of rural town centers, known as “villages” and “hamlets.” These rural activity centers were focused on identified pre-existing development patterns and designed to maintain the existing character of rural growth. The centers were eradicated and replaced with a county-wide uniform lot density in the final Comprehensive Plan. Clark County issued a policy memo stating that the reason the rural activity centers were removed from the plan was that previous Growth Management Board decisions appeared to prevent the County from allowing any growth in rural areas. . .*

**CONCLUSIONS OF LAW**

*Pg. 6, 7. Rural Land Densities. The County’s rural and resource development regulations are inconsistent with the GMA. The GMA requires counties to determine that planning goals are utilized and are a part of the consideration supporting its decisions. One of the planning goals requires a variety of residential densities and housing types, which the Clark County Community Framework Plan met by identifying pre-existing small development patterns in rural areas and creating rural activity centers with a variety of rural densities. The eradication of the centers and their replacement with a uniform lot density violates the planning goal requiring a variety of residential densities. . .*

**ORDER**

*Pg. 7, Based on the foregoing Findings of Fact and Conclusions of Law, IT IS HEREBY: ORDERED, ADJUDGED AND DECREED that the Clark County Comprehensive Plan and Development Regulations adopted in Ordinance 1994-12-47 on December 20, 1994 are remanded to the Western Washington Growth Management Hearings Board with direction to enter a decision in accord with this Order mandating County action to correct the violations of the GMA identified herein;*

The Honorable Edwin J. Poyfair

Sent from [Mail](#) for Windows 10



Project: Proebstel Rural Center  
Date: June 11, 2018

### Comment Card

Please take a moment to complete this card and give us your feedback on this project. Thank you for your valuable help!

#### Comments:

*To properly show this geographically please include a map that shows the Wadsworth USB and Camas USB as well as the boundary of the proposed Rural Center. It's only fair to show the proximity to both current boundaries.*

*Julie Stanton*



For other formats, contact the Clark County ADA Office: **Voice** (360) 397-2000; **Relay** 711 or (800) 833-6388; **Fax** (360) 397-6165; **E-mail** ADA@clark.wa.gov.



**Project: Proebstel Rural Center**  
**Date: June 11, 2018**

### Comment Card

Please take a moment to complete this card and give us your feedback on this project. Thank you for your valuable help!

#### Comments:

Please do not beat around the bush.

Answer questions clearly.

Do not ignore others opinions



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**Date: June 11, 2018**

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#### Comments:

Clark County does not consider the livability of Clark County residents. Focus is only toward commercial entities.

The County is not planning growth they're just letting it happen.

Proebstel does NOT meet the Rural Center definitions



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Project: Proebstel Rural Center  
Date: June 11, 2018

### Comment Card

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#### Comments:

Why are properties being included in the PRC without first consulting affected property owners?

When will a traffic study be done to inform this decision? Will this traffic study be available before the July 19<sup>th</sup> meeting?





Project: Proebstel Rural Center  
Date: June 11, 2018

### Comment Card

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### Comments:

My name is Tom Ripson, 4145 N. 15th St, 110 Camp Hill, WA 98716.604  
The truck traffic is extremely bad on this small  
stretch of Hwy 509. I do not think Proebstel  
Rural Center is needed at this time. No planning  
was done for road repair, or though given to traffic  
or traffic volume, not road improvement for  
the connect to Hwy 509. In planning for  
traffic "Now", not by planning a terrible  
job where is the future planning



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Project: Proebstel Rural Center  
Date: June 11, 2018

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### Comments:

I Attended the June 11, 5-7pm Meeting at Proebstel Church. It did not take long for me to form the opinion that the aim of this development is to secure the retirement(s) of the few large property owners ~~with~~ currently operate home-based businesses along the corridor where the development is being planned. As a someone who has just sunk his savings into the home where I live, this discussion is a great deal. The last thing this neighborhood needs is more Industrial Road traffic along a 50MPH + Roadway where accidents happen frequently. There is no shoulder on the SR500 road. Running more trucks and trailers on this road



For other formats, contact the Clark County ADA Office: Voice (360) 397-2000; Relay 711 or (800) 833-6388; Fax (360) 397-6165; E-mail ADA@clark.wa.gov.

Makes No Sense.



**Project: Proebstel Rural Center**  
**Date: June 11, 2018**

### Comment Card

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### Comments:

Enlightening - Glad it was brought out by attendees - that Project seems to benefit a few (large land owners) - hope it doesn't happen!! Leave well enough alone



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Date: June 11, 2018

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#### Comments:

The biggest concern of residents in the affected area is traffic safety. The development of this Rural Center would add congestion to traffic congestion. No road improvement planned for leaving the existing traffic increase because of housing developments.  
I am against this Proebstel Rural Center.





**Project: Proebstel Rural Center**  
**Date: June 11, 2018**

## Comment Card

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### Comments:

My concern is the amount of traffic that currently uses is on the high side, and with a huge subdivision currently being built at Green Mountain, the county needs to want to see how that affects the traffic before adding more residences and business traffic to the mix. It seems that there aren't advantages for the people who live there.

There seems to be only advantages only for the people in the blue designation and forcing others to change. You need to wait til the road is fixed.



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**Project: Proebstel Rural Center**  
**Date: June 11, 2018**

### Comment Card

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### Comments:

IT LOOKS TO ME LIKE THIS WILL CREATE MORE GROWTH AND  
URBAN SPRAWL WITHOUT THE INFRASTRUCTURE TO HANDLE IT PROPERLY.  
LET'S TRY TO BUILD THE ROADS, STOP LIGHTS, ETC BEFORE WE HAVE  
MORE BUSINESS GROWTH AND URBAN SPRAWL INTO A NICE RURAL  
AREA.



For other formats, contact the Clark County ADA Office: **Voice** (360) 397-2000; **Relay** 711 or (800) 833-6388; **Fax** (360) 397-6165; **E-mail** ADA@clark.wa.gov.

**From:** [dsermone@aol.com](mailto:dsermone@aol.com)  
**To:** [Hermen, Matt](#)  
**Subject:** Fwd: Proebstel Rural Center  
**Date:** Thursday, June 14, 2018 10:18:02 AM

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I evidently sent this to the wrong government email so I am forwarding my comments to you as the moderator of the meeting at Proebstel Church.

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

From: dsermone <dsermone@aol.com>  
To: ADA <ADA@Clark.wa.gov>  
Sent: Thu, Jun 14, 2018 10:07 am  
Subject: Proebstel Rural Center

**I was at the Proebstel Church for the Rural Center meeting. I am very much against this proposal.**

There is every commercial need for the area being fulfilled within a couple of miles. There is a Safeway, a Walmart, there are new buildings being planned to line Fourth Plain like a large Goodwill, Ricks Fencing, and several new commercial buildings meant to house other businesses. There are multiple restaurants, auto body shops, etc.. All of these are on the west side of 162nd. Why is it necessary to add to the a continuing strip mall down Fourth Plain. The traffic is more than the streets can handle right now and almost 200 new houses will exit onto Fourth Plain.

Until you can fix the roads and the infrastructure of the area the Rural Center proposal should not even be considered.

Diana Sermone  
24311 NE 124th Circle  
Brush Prairie, WA 98606  
360 892 2674



**From:** [Carol Levanen](#)  
**To:** [Hermen, Matt](#)  
**Subject:** Fw: FW: Proebstel rural center  
**Date:** Monday, June 18, 2018 3:14:57 PM  
**Attachments:** [RES2014-06-16 Suspension2014-2016AnnualReview.pdf](#)  
[John Proebstel.pdf](#)

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Hello Matt,

Susan Rasmussen forwarded me this information for my review. Key here, is the fact that in 1994, the county completely wiped out all 31 rural centers off the map in the 1994 Comprehensive Plan. These were communities that historically served their neighboring communities.

It was illegal for them to do that, and Clark County Citizens United, Inc. took the county to court for doing so. The court ruled in our favor, and the county was to return the proposed rural centers to the Plan. But, as you see, they only included a fraction of what was originally proposed. This was just another example of Clark County ignoring the court orders and thumbing their nose at the law.

These areas should be looked at again, after more than 25 years of static..

Best Regards,

Carol Levanen,  
Exec. Secretary, CCCU, Inc.

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

**From:** susan rasmussen <sprazz@outlook.com>  
**To:** cnldental@yahoo.com <cnldental@yahoo.com>  
**Sent:** Friday, June 15, 2018, 9:09:12 AM PDT  
**Subject:** FW: Proebstel rural center

Sent from [Mail](#) for Windows 10

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**From:** Hermen, Matt <Matt.Hermen@clark.wa.gov>  
**Sent:** Thursday, June 14, 2018 4:38:41 PM  
**To:** 'susan rasmussen'  
**Subject:** RE: Proebstel rural center

Susan,

The November 2014 was not considered in the 2016 Comprehensive Plan because the attached resolution (2014-06-16) suspended the 2015 and 2016 annual reviews. In 2017, the Clark County Councilors approved a change in Clark County Code 40.560.010 that switched the creation of rural centers from annual reviews to the docket process. Therefore, 2018 is the first year the Councilors were able to approve processing the petition through the Comprehensive Plan docket process.

In 1998 the county approved six LAMIRD's: Amboy, Brush Prairie, Chelatchie Prairie, Dollar Corner, Hockinson and Meadow Glade. 31 potential rural centers were considered, but only six were approved. In 2000, the county approved Farger Lake as a rural center.

Per the attached document (John Proebstel.pdf, pg. 19-20) the Proebstel post office existed from 1902-1911.

Thank you,

**Matt Hermen, AICP CTP**  
Planner III  
COMMUNITY PLANNING

564.397.4343

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**From:** susan rasmussen [mailto:sprazz@outlook.com]  
**Sent:** Thursday, June 14, 2018 2:09 PM  
**To:** Hermen, Matt  
**Subject:** Proebstal rural center

Hello Matt,

I see the petition from the landowners in the Proebstal area was submitted to the county back in 2014. That was well within the time frame to be considered for the 2016 comprehensive plan update. Why is it just now getting attention for action? What happened to the petition after the 2014 submittal?

Extending back generations, my family has farming history in the Proebstal area. I don't think Proebstal had a post office, but it was considered a rural center and valued for the convenient services and goods that were once provided there. . . it was a resource for the rural community and part of the area's character. When was it removed from being a LAMIRD?

Thank you,

Susan Rasmussen

Sent from [Mail](#) for Windows 10

This e-mail and related attachments and any response may be subject to public disclosure under state law.



**ATTENDANCE SIGN IN**

Date: June 11, 2018

Project: Proebstel Rural Center

**\*\* Please PRINT Clearly \*\***

PRINT NAME	MAILING ADDRESS	ZIP CODE	e-mail list?	PRINT - E-MAIL
Mike Opeka	18110 NE 4th Plain	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	opokaz@yahoo.com
Virginia Adam	5512 NE 229th Court	1	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	SINAY 1950@HOTMAIL.COM
Jacqueline Maxwell	5410 NE 229th Ct	98682	<input type="checkbox"/> YES <input type="checkbox"/> NO	jacqueline.maxwell@netnet.com
Allen Thomas	1315 NE 212th Ave	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	allen.thomas@outlook.com
Deborah Hansen	19513 NE 68th St	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	debhansen@aol.com
Cynthia Simon	28601 NE Emerald Rd	98607	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	GHWSHAU@Gmail.com
JEANNINE KENASTON	7652 NE 217th AVE.	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	MORSAAMI@Gmail.com
David Lane	24003 N.E. 68th St	98682	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Valbroussawing 24003@gmail.com
Vererie Lane	11 11 11	11	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
Al Numan	77103 NE 68th St	98687	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	ejnpane@gmail.com
Jenny Howd	6600 NE 292nd Ct	98607	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	4howds@comcast.net



**ATTENDANCE SIGN IN**

Date: June 11, 2018

Project: Proebstel Rural Center

**\*\* Please PRINT Clearly \*\***

PRINT NAME	MAILING ADDRESS	ZIP CODE	e-mail list?	PRINT - E-MAIL
Jonathan Coulmond	20814 NE 58 <sup>th</sup> St	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	benite@msu.com
Douglas Vandyrke	7768 NE 222 AVE	98682	<input type="checkbox"/> YES <input type="checkbox"/> NO	doogles.vandyrke@gmail.com
Gabe Rhy	19516 NE 68 <sup>th</sup> St	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	gab929502@yahoo.com
Karen Pickering	25909 NESandway	98683	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	kipick@m.a.com
Joan Freue	25608 NE 53RD	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	jobreue@comcast.net
Richard Borveman	9411 NE 212 <sup>th</sup> AVE	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	lauritaureus5@AOL.com
Larry L-Brown	15640 NE Fourth Plain Suite 106 P.M.B 40	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	larrybrown7031@comcast.net
Wendy McLaugh	70 <sup>th</sup> Camas rd	98602	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	wendymculloughp7@gmail
Ann Shaw	28601 NE EMERALD RD, CAMAS		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	ampshaw@gmail.com
Lori Wood	8409 NE 222 Ave	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	LLWOOD360@gmail.com
Kristen Johnson	5610 NE 252 Ave	98682	<input type="checkbox"/> YES <input type="checkbox"/> NO	Johnson KD@Q.com



**ATTENDANCE SIGN IN**

Date: June 11, 2018

Project: Proebstel Rural Center

**\*\* Please PRINT Clearly \*\***

PRINT NAME	MAILING ADDRESS	ZIP CODE	e-mail list?	PRINT - E-MAIL
Genevieve Tufford	23015 XE Road	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	gentuffe@msn.com
Richard Bynder MARYANNE CAMPBELL	13504 NE 84 <sup>TH</sup> ST SUITE 103	98682	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	bender150@comcast.net
Doug Falkner	18004 NE 81 <sup>ST</sup> Cir	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	doug.falkner1950@comcast.net
MIKE LYONS	5412 NE 199 AVE	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	MIKELYONS@AOL.COM
Gonric GZASPEY	23217 NE 83RD ST	98682	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	ccg/aspey@msm.com
Petra Romines	8310 NE 212 AVE	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	promi37@hotmail.com
Chris Romines	8310 NE 212 AVE	98682	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Bill HUYETTE			<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	HUYETTE@PAINSEELIMU.BIZ
Vivie Stanton	20408 NE 60 <sup>TH</sup> ST	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	judstantone.comcast.net
KEN HARDING	19838 NE 68 <sup>ST</sup>	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Kenharding13@GMAIL.COM
Elinor Coulmore	20814 NE 58 <sup>TH</sup> ST	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	beerite@msn.com



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Date: June 11, 2018

**\*\* Please PRINT Clearly \*\***

Project: Proebstel Rural Center

PRINT NAME	MAILING ADDRESS	ZIP CODE	e-mail list?	PRINT - E-MAIL
FRANK BENEITSCHNITZ	18014 NE 85 <sup>th</sup> AVE, VANCOUVER	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	beritenergy@gmail.com
MIKE SERRA	<del>22402 NE 85th St</del> 22402 NE 85th St	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	MIKE SERRA@yahoo.com
LINDA ANDERSON	P.O. Box 821669 VANCOUVER	98682	<input type="checkbox"/> YES <input type="checkbox"/> NO	9KPROP@aol.com
Lina Ujanitz (+Paul)	19204 NE 58th St Vancouver	98682	<input type="checkbox"/> YES <input type="checkbox"/> NO	llyn6122@gmail.com
KERRY SCHULTZ	PO Box 1269 BATTLEGROUND	98604	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	KERRY.SCHULTZ@HOTMAIL.COM
Aileen Mann	PO Box 65657 Vancouver	98665	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	amnittr@comcast.net
Jeremy Kargelder	22218 NE 68th St.	98682	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Megan Karnath	8115 NE 199th Ave	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Megan.Karnath@gmail.com
Brad & Tawana Thompson	18211 NE Fourth Plain Rd	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	brad-tawana-thompson@comcast.net
John Kojis	9910 NE 219th Av	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	jkojis@gmail.com
Ekaime Robertson	22218 NE 116th Circle	98682	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
RICHARD STEIN	19007 NE 65th St, PO Box 87115	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<del>7th 19007 NE 65th</del> VAN 19007@yahoo.com

98687



**ATTENDANCE SIGN IN**

Date: June 11, 2018

Project: Proebstel Rural Center

**\*\* Please PRINT Clearly \*\***

PRINT NAME	MAILING ADDRESS	ZIP CODE	e-mail list?	PRINT - E-MAIL
Darryl Johnson	5410 NE 252 <sup>nd</sup> ave	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	BrotserDarrylJohnson
Scott VanSelder	8706 NE 17 ST	98664	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Stocks911@aol.com
Kirk VanGebeber	22308 NE 168 <sup>th</sup> ST	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	vanded12@gmail.com
Diana Sarmone	24311 NE 124th Circle	98606	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	dsarmone@aol.com
Jeanne Kojis	9910 NE 219 AVE	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	JeanneKojis@gmail.com
GEORGE KINSEY	8811 NE 312 <sup>th</sup> AVE.	98607	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	SHAGGYGK@comcast.net
JUSTIN APPEL	PO BOX 822372	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	APPEL2004@comcast.com
Ryan Seekins	18821 NE 4th Plank Rd	98682	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	integrateddaily@outlook.com
WALT CEMMER	P.O. BOX 821507	98682	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
BRENDA FINN	PO BOX 821063 Vancouver	98682	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	GUJARAGIRI60@comcast.net
Lilla Golosinski	18513 NE 4th Plain Rd	98682	<input type="checkbox"/> YES <input type="checkbox"/> NO	golosinski@gmail.com
Bonnie Ramirez	8115 NE 199th Ave	98682	<input type="checkbox"/> YES <input type="checkbox"/> NO	Ramirez.ohana1@gmail.com



Mr. Oliver Orjiako  
Clark County Community Planning  
1300 Franklin Street; 3<sup>rd</sup> Floor  
P.O. Box 9810  
Vancouver, WA 98666-9810

RE: Proposed Proebstel Rural Center/Planning Commission Work Session

The Proebstel Neighborhood Association (PNA) Board represents the residents located within our boundaries and has reviewed the County's proposal for the Proebstel Rural Center (PRC), Clark County's Comprehensive Growth Management Plan, WA regulation guiding Growth Management Plans, the SEPA DNS and participated in the June 11<sup>th</sup> community informational meeting. The PNA Board serves to promote the common interests and welfare of all our neighbors by promoting our neighborhood's livability and quality of life. At this time the Board does not support the PRC designation for the following reasons:

**1) The PRC fails to meet Rural Center Policy 3.3.6**

We have concerns about the planning process for the PRC. In the June 11<sup>th</sup> community meeting it was clear many 2014 petitioners were unaware of the Rural Center petition's recent revival. The County does not appear to have the 60% petitioner support required for this project to proceed but has already issued a SEPA DNS and is holding community and County meetings to move forward.

**1) The PRC fails to meet Countywide Planning Policy 1.1.14.**

The PRC is located adjacent to the Urban Growth Boundary and closely located to existing high density commercial services such as Walmart and Safeway within the Urban Growth Area. The PRC is located in a Rural Urban Transition Area (RUTA) and would be overshadowed by adjacent existing commercial services, failing in its attempt to provide job growth, tax base to support schools and rural and resource needs for the surrounding community.

**2) The PRC fails to meet Rural Center Policy 3.3.2**

*Rural Centers ...are surrounded by rural landscapes of generally open land used for agriculture, forestry, large lot residential, recreational and environmental protection purposes.*

Properties included in this area are not designated agricultural or forest lands. Lands in East Clark County within the designated growth area along the Columbia River have not carried this use since the 1970's and the proposed PRC is within 1000 feet of land already approved to build 800 homes on various density lots. The project location should be considered to be a RUTA.

**3) The PRC fails to meet RCW 36.70A.070 for consistency**

The PRC is inconsistent with the current Rural Centers of Brush Prairie, Dollars Corner, Meadow Glade, Hockinson, Farger Lake, Amboy and Chelatchie Prairie, all of which meet the Rural Center policy as outlined in the Comprehensive Plan. As such, the PRC is inconsistent with the Comprehensive Growth Management Plan and appears to set a new precedent for the Rural Center Designation. The Plan must be an internally consistent document and all elements shall be consistent as well.

The proposed PRC serves no rural community need given the adjacent urban growth and existing dense commercial development. This proposal would seriously exacerbate road safety in an area already overwhelmed with dangerous traffic conditions and where there are no planned road improvements for more than a decade. This area should be considered a RUTA and as it continues to transition requires a plan to address urban sprawl and transportation plans for current and future development in this area.

This PRC proposal is a step backwards in time and would allow for inconsistent urban sprawl already progressing along the Columbia River and eastern Clark County. Eastern Clark County must continue with a strong rural urbanization transition plan committed to planning with the City of Camas, Camp Bonneville and a proposal for a future bridge in the area of 192<sup>nd</sup> Avenue to the Portland metro area.

Thank you for the opportunity to comment.

The Proebstel Neighborhood Association Board

Mr. Oliver Orjiako  
Clark County Community Planning  
1300 Franklin Street; 3<sup>rd</sup> Floor  
P.O. Box 9810  
Vancouver, WA 98666-9810

RE: Proposed Proebstel Rural Center/Planning Commission Work Session

The Proebstel Neighborhood Association (PNA) Board represents the residents located within our boundaries and has reviewed the County's proposal for the Proebstel Rural Center (PRC), Clark County's Comprehensive Growth Management Plan, WA regulation guiding Growth Management Plans, the SEPA DNS and participated in the June 11<sup>th</sup> community informational meeting. The PNA Board serves to promote the common interests and welfare of all our neighbors by promoting our neighborhood's livability and quality of life. At this time the Board does not support the PRC designation for the following reasons:

**1) The PRC fails to meet Rural Center Policy 3.3.6**

We have concerns about the planning process for the PRC. In the June 11<sup>th</sup> community meeting it was clear many 2014 petitioners were unaware of the Rural Center petition's recent revival. The County does not appear to have the 60% petitioner support required for this project to proceed but has already issued a SEPA DNS and is holding community and County meetings to move forward.

**1) The PRC fails to meet Countywide Planning Policy 1.1.14.**

The PRC is located adjacent to the Urban Growth Boundary and closely located to existing high density commercial services such as Walmart and Safeway within the Urban Growth Area. The PRC is located in a Rural Urban Transition Area (RUTA) and would be overshadowed by adjacent existing commercial services, failing in its attempt to provide job growth, tax base to support schools and rural and resource needs for the surrounding community.

**2) The PRC fails to meet Rural Center Policy 3.3.2**

*Rural Centers ...are surrounded by rural landscapes of generally open land used for agriculture, forestry, large lot residential, recreational and environmental protection purposes.*

Properties included in this area are not designated agricultural or forest lands. Lands in East Clark County within the designated growth area along the Columbia River have not carried this use since the 1970's and the proposed PRC is within 1000 feet of land already approved to build 800 homes on various density lots. The project location should be considered to be a RUTA.

**3) The PRC fails to meet RCW 36.70A.070 for consistency**

The PRC is inconsistent with the current Rural Centers of Brush Prairie, Dollars Corner, Meadow Glade, Hockinson, Farger Lake, Amboy and Chelatchie Prairie, all of which meet the Rural Center policy as outlined in the Comprehensive Plan. As such, the PRC is inconsistent with the Comprehensive Growth Management Plan and appears to set a new precedent for the Rural Center Designation. The Plan must be an internally consistent document and all elements shall be consistent as well.

The proposed PRC serves no rural community need given the adjacent urban growth and existing dense commercial development. This proposal would seriously exacerbate road safety in an area already overwhelmed with dangerous traffic conditions and where there are no planned road improvements for more than a decade. This area should be considered a RUTA and as it continues to transition requires a plan to address urban sprawl and transportation plans for current and future development in this area.

This PRC proposal is a step backwards in time and would allow for inconsistent urban sprawl already progressing along the Columbia River and eastern Clark County. Eastern Clark County must continue with a strong rural urbanization transition plan committed to planning with the City of Camas, Camp Bonneville and a proposal for a future bridge in the area of 192<sup>nd</sup> Avenue to the Portland metro area.

Thank you for the opportunity to comment.

The Proebstel Neighborhood Association Board

Mr. Oliver Orjiako  
Clark County Community Planning  
1300 Franklin Street; 3<sup>rd</sup> Floor  
P.O. Box 9810  
Vancouver, WA 98666-9810

6/25/2018

RE: Proposed Proebstel Rural Center

The Proebstel Neighborhood Association (PNA) Board represents the residents located within our boundaries (see attached map) and has reviewed the County's proposal for the Proebstel Rural Center (PRC), Clark County's Comprehensive Growth Management Plan, WA regulation guiding Growth Management Plans, the SEPA DNS, participated in the June 11<sup>th</sup> community informational meeting, submitted preliminary comments to the Planning Commission, and attended the Planning Commission Work Session on June 21st. The PNA Board serves to promote the common interests and welfare of all our neighbors by promoting our neighborhood's livability and quality of life.

**The comments outlined below fall into two categories.** The first half concerns Rural Center issues. The last half concerns specific SEPA related issues.

**The proposed PRC fails to meet the standard outlined in Rural Center Policy 3.3.6**

*Rural Center designation criteria are as follows:*

• *an area proposed as a Rural Center had to have existed as of July 1, 1990, **identifiable by pre-existing small lot development patterns...***

The proposed area is zoned R-5 (5 acre parcels). At the June 21<sup>st</sup> PC work session, it was mentioned that the proposed PRC properties currently average 5.4 acres. So, clearly, the proposed PRC does **NOT** meet the criteria of "**pre-existing small lot development patterns.**" **On this issue alone, the proposed PRC should be denied.**

**The proposed PRC fails to meet the standard outlined in Countywide Planning Policy 1.1.14.**

*Rural Centers are outside of urban growth areas centers and urban reserve areas and provide public facilities (e.g., fire stations, post offices, schools) and commercial facilities to support rural lifestyles. Rural centers have residential densities consistent with the surrounding rural minimum lot sizes and do not have a full range of urban levels of services.*

The proposed PRC is within a Rural Urban Transition Area (RUTA) located adjacent to the Urban Growth Boundary and closely located to the following high density commercial services within the City of Vancouver and Urban Growth Area:

**.05 mile of existing commercial services:**

Safeway (grocery, gas and pharmacy)  
Dollar Store  
9 dining options  
2 banks  
Mail services  
Insurance services  
Real estate services  
Spa services  
Veterinarian services  
Dry cleaners  
Two schools (primary and middle)

**1 mile of existing commercial services:**

Walmart (grocery, gas and pharmacy)  
Automobile repair services  
Fire station  
Goodwill  
Restaurants  
3 Retail Buildings with 30+ services

**The proposed PRC fails to meet Rural Center Policy 3.3.4**

*Appropriate uses for Rural Centers include: resource-based industrial development consistent with rural character and levels of service; commercial uses supporting resource uses, such as packing, first state processing and processing which provides value added to the resource products may occur in resource areas; and, post offices, veterinary clinics, day care, small medical practices and schools that provide employment, shopping services and housing opportunities within Rural Centers. The scale should be compatible with surrounding roads and utilities, which reinforce the rural character and distinct sense of community.*

The proposed PRC is within a RUTA located adjacent to the Urban Growth Boundary and closely located to high density commercial services within the Urban Growth Area. The PRC services will not be able to compete with already existing nearby services. And the surrounding feeder roads (182nd Ave, 65<sup>th</sup> St, and 199<sup>th</sup> Ave) onto Highway 500 are fraught with issues as explained to County and State Transportation personnel at our May, 2018 Neighborhood meeting.

### **The proposed PRC fails to meet Rural Center Policy 3.3.2**

*Rural Centers are generally characterized by smaller lot patterns; have residential development and small-scale business that provides convenience shopping and services to nearby residents; have access to arterial roadways; and, are surrounded by rural landscapes of generally open land used for agriculture, forestry, large lot residential, recreational and environmental protection purposes.*

Properties included in the PRC petition are not designated agricultural resources, forest, or mineral resource lands. Lands in East Clark County within the designated growth area along the Columbia River have not carried this consistency since the 1970's and the proposed PRC is within 1000 feet of land already approved to build 800 homes on various density lots.

### **The proposal PRC fails to meet RCW 36.70A.070**

The PRC proposal is inconsistent with other Rural Centers and as such with Clark County's Comprehensive Growth Management Plan. The Plan must be an internally consistent document and all elements shall be consistent with the future land use.

*Clark County Rural Centers are distinguished by small lot development with a definite edge, surrounded by a rural landscape of generally open land used for agriculture, forestry, large lot residential development, recreation and environmental protection purposes. These centers are often at the crossroads where historical development has allowed for both smaller lots and commercial uses within these nodes of development. Within these centers rural residential development is based on historical patterns. Commercial activities located at crossroads provide rural residents with an opportunity to meet many of their daily needs without going into one of the cities.*

*Within the Rural Centers, the following land uses have been identified: residential, commercial, industrial, public facilities, parks and open space. The commercial and industrial designations are similar to past comprehensive plan maps with some additional commercial areas designated. The commercial and industrial activities within these centers should support opportunity for job growth, tax base to support schools, rural and resource needs and not draw people from the urban area.*

*Commercial uses to be encouraged in Rural Centers include post offices, veterinary clinics, day care, schools, small medical practices, shopping services and housing opportunities compatible with surrounding roads and utilities. These, in turn, reinforce the center's rural character and distinct sense of community.*

The proposed amendment to the comprehensive plan designation and zoning from Rural -5 to Rural Center with RC-1, RC-2.5 zoning and Rural Commercial with CR-2 zoning allows for the subdivision of the petitioner's lots and is an inconsistent use of the rural center designation only serving to unfairly enrich the petitioners rather than the community as a whole. Any rural commercial services offered by the PRC would be overshadowed by adjacent existing commercial services and would fail in its attempt to provide job growth, tax base to support schools and rural and resource needs for the surrounding community. The PRC is inconsistent with the current Rural Centers of Brush Prairie, Dollars Corner, Meadow Glade, Hockinson, Farger Lake, Amboy and Chelatchie Prairie, all of which meet the Rural Center policy as outlined in the Comprehensive Plan.

This area is a RUTA and as it continues to transition requires a plan to address urban sprawl, transportation plans, and an overall implementation of a master plan for current and future development in this area. This PRC proposal is a step backwards in time and would allow for inconsistent urban sprawl already progressing along the Columbia River and eastern Clark County as well as impede planners as urban planning progresses. Eastern Clark County must continue with a strong rural urbanization plan committed to planning with the City of Camas, Camp Bonneville and a proposal for a future bridge in the area of 192<sup>nd</sup> Avenue to the Portland metro area.

### **TRAFFIC IMPACTS & FEES FOR THIS PROPOSAL**

Historically, the vision and planning for State Highway 500 was to compensate for urban growth, envisioned by the commissioners as a gateway to the Columbia Gorge Recreational Area (CGRA). Highway 500 was to allow for hotels and redirect tourists away from what would become an over-burdened highway 14. Since these days significant residential development has been allowed in this area creating a conflict between residents and resource-based industrial traffic. Highway 500 within the PRC serves residents and is the haul route for timber and mineral resources, however there have been minimal road improvements despite residential growth. In a recent PNA meeting, local and state officials briefed our community about the need to address long overdue road improvements and stated that funding for any preliminary road planning is more than a decade away though current and proposed residential development is already outstripping infrastructure requirements.

The PRC will impact already overburdened existing roads and the Board rejects the notion that cumulative impacts will be comprehensively addressed as petitioners subdivide under this designation. The PRC places no road improvement requirements on property owners as they chose to subdivide, requiring only that they add sidewalks at the time of subdivision. The results of this type of planning are inconsistent and inadequate for the future of our community. This RUTA requires a comprehensive traffic plan designed to compensate for urban growth and must be consistent with the City of Camas planning, Camp Bonneville and a proposal for a future bridge in the area of 192<sup>nd</sup> Avenue to the Portland metro area.

The proposed PRC serves no need given the adjacent urban growth boundary and existing dense commercial development. This proposal would seriously exacerbate road safety in an area already overwhelmed with dangerous traffic conditions and where there are no planned road improvements for more than a decade. The Board rejects a piecemeal approach to community planning that offers no substantive infrastructure improvements for this RUTA.

### **Planning Process for this Proposal**

The Board also has concerns about the planning process for the PRC. In 2014 petitioners were asked by citizen Marc Boldt to join this petition, however the PRC was suspended during the Comprehensive Plan Review. In February 2017 the PRC was re-introduced by Clark County Council Chair Marc Boldt during Council Time. At this time Mr. Boldt also requested to change the review type from an Annual Review as required under the Growth Management Plan CCC40.560 and pursuant to RCW36.70A.070(5)(d) to a Docket review. In October 2017 the Rural Center review type was officially changed to a Docket Review and as a result the \$10,000 petitioner fee has been removed. You may listen to Chair Boldt's Rural Center proposal here: [https://www.clark.wa.gov/sites/default/files/dept/files/the-grid/021517BT\\_1.mp3](https://www.clark.wa.gov/sites/default/files/dept/files/the-grid/021517BT_1.mp3)

Should the PRC move forward in the planning process the PNA Board will ask for Council Chair Boldt's recusal from any further action on the PRC as several original petitioners have stated Mr. Boldt introduced the proposal to them and requested signatures in 2014.

The original petition for the proposal was signed in 2014 and at the June 11, 2018 community meeting it was clear some of the original 2014 petitioners were unaware of the Rural Center petition's recent revival. If the PRC continues to be promoted, the PNA Board requests a current 2018 petition to be submitted by the affected property owners for this proposal.

## **SEPA - RCW 43.21C.110**

As lead agency Clark County asserts this project is a non-development action and has issued a Determination of Non-Significance (DNS) finding under WAC 197-11-704 (2)(b)(ii). This action proposes an adoption of a comprehensive land use plan and change to zoning ordinance that will allow for subdivision and change to commercial use, because of this there will be significant cumulative environmental impacts and the PNA Board requests an EIS be conducted to address the cumulative impacts of the County's land use action.

In addition, because the PRC doesn't meet the lot size requirements of **Rural Center Policy 3.3.6** it is inconsistent with other rural centers it will serve as a precedent for future rural center actions requiring an EIS at this time.

## **The DNS violates WAC 197-11-340 (3)(iii) IMPACTS**

### **DNS (B)(3)(a) Surface Water**

The Surface Water analysis is inadequate. This action will allow for significant adverse environmental impacts to Lacamas Creek, a Type F water body with a nexus to the Columbia River watershed.

The DNS(B)(3) fails to recognize Matney Creek and its tributary Little Matney Creek, both Type F water bodies with a nexus to the Columbia River watershed that runs through at least three of the proposed properties.

### **DNS (B)(3)(a)(2)**

The action will allow for subdivision and commercial development to occur within 200 feet of the Type F water bodies described above.

### **DNS (B)(3)(a)(3)**

This action will allow for subdivision, commercial development and paving to occur that may require fill of wetlands. Several of the properties within the PRC may contain Wetlands of the U.S requiring a Section 404 permit from the U.S. Army Corps of Engineers for the proposed change in land use and zoning. The DNS does not address cumulative impacts of this land use action and contains no wetlands delineation or mitigation measures outlining cumulative impacts to wetlands of the U.S.

### **DNS (B)(3)(a)(5)**

This action does include parcels of which portions lie within the 100-year floodplain.

### **DNS (B)(3)(b)(1) Groundwater**

This action allows for the subdivision of parcels and for additional wells to be drilled affecting groundwater sources. The change in zoning designation from Rural -5 to Rural Center with RC-1, RC-2.5 zoning and Rural Commercial with CR-2 zoning allows for the subdivision of existing lots, and at the minimum will allow for an additional 13 lots to be created and 26 new parking spaces.

### **DNS (B)(3)(b)(2) Groundwater**

This action allows for the subdivision of parcels and for additional septic systems to be placed. The change in zoning designation from Rural -5 to Rural Center with RC-1, RC-2.5 zoning and Rural Commercial with CR-2 zoning allows for the subdivision of existing lots, and at the minimum will allow for an additional 13 lots to be created and 13 additional septic systems.

### **DNS (B)(3)(c)(1) Storm water**

This action allows for the subdivision of parcels, parking lots and for commercial development, we request storm water collection and disposal be addressed as a part of this action.

### **DNS (B)(5)(a) Animals**

This action will impact fish within the Columbia River watershed.

### **DNS (B)(5)(b) Endangered or Threatened Species**

This action allows for impact to the Oregon Spotted Frog and its habitat. The Oregon Spotted Frog has been identified by the USFWS as threatened under the Endangered Species Act and its range has been identified within this project area. <https://ecos.fws.gov/ecp0/profile/speciesProfile?sPCODE=D02A>

### **DNS (B)(8) Land and Shoreline Use**

This action must be compliant with Shoreline Management Plans (SMP) goals and policies included in the comprehensive plan. RCW 36.70A.480. When a jurisdiction updates its SMP consistent with Ecology's new guidelines (Chapter 173-26 WAC), and according to a schedule in RCW 90.58.080, protection for critical areas within shorelines is transferred from the critical areas ordinance to the SMP. Protection must be at least equal to that from the CAO under the GMA the PRC must identify Jurisdiction considered under the Office of Financial Management's list of essential state public facilities and state required facilities along state highways that are required or likely to be built within the next six years. i.e., RCW 36.70A.200(4).

### **DNS (B)(10)(c) Aesthetics**

This action allows for a change in aesthetics within the PRC boundaries and should be addressed as part of an EIS to show how they are consistent with other Rural Center designations within Clark County and the State.

*Commercial uses to be encouraged in Rural Centers include post offices, veterinary clinics, day care, schools, small medical practices, shopping services and housing opportunities compatible with surrounding roads and utilities. These, in turn, reinforce the center's rural character and distinct sense of community.*

Property owners within the PRC boundaries should be aware of what commercial uses are consistent with the Comprehensive Management Plan as a part of this action.

### **DNS (B)(12)(a-c) Recreation**

This action is located along the major arterial road that will lead to the largest recreational park within Clark County, Camp Bonneville. This action will impede planners as urban planning progresses towards Camp Bonneville and does not meet RCW 36.70A.070 for internal comprehensive plan consistency. Eastern Clark County must continue with a strong urbanization plan committed to planning with Camas, the future Camp Bonneville and a proposal for a future bridge in the area of 192<sup>nd</sup> Avenue to the Portland metro area.

### **DNS (B)(13)(a-d) Historic and Cultural Preservation**

This DNS identifies 11 structures that are identified as eligible for listing in national, state or local registers. As a part of this action please provide the plans you will require from property owners to avoid, minimize or compensate for loss, changes to and disturbances to these historical resources. As this proposal moves forward it will be important for landowners within the PRC to understand the importance of these structures.

### **DNS (B)(14)(a-h) Transportation**

This action will allow for subdivision of existing lots, commercial uses and new parking spaces and as such will impact already overburdened existing roads. The PNA Board requests cumulative impacts of this action be comprehensively addressed as part of an EIS. Proebstel already experiences significant resource-based industrial impact from excessive, unabated quarry traffic. In a recent PNA meeting, local and state officials briefed our community about the need to address long overdue road improvements and stated that funding for any preliminary road planning is more than a decade away while current development is already outstripping infrastructure requirements. This action would seriously exacerbate road safety in an area already overwhelmed with dangerous traffic conditions and where there are no planned road improvements for more than a decade.

As part of an EIS the Board requests the lead agency:

Comply with future needs of all County and State services provided under State Highway guidelines. RCW 36.70A.070(6)(a)(iv)(A) - WAC 365.196-430(2)(k)(iv) recommends counties and cities consider the cost of maintaining facilities when considering new facilities.

Comply with the County's six-year street, road, and transit program and the office of financial management's ten-year program. The comprehensive plan should include forecasts for traffic for at least 10-years based on the adopted land use plan to provide information on the location, timing, and capacity needs of future growth. These needs fall under chapter 47.06 RCW.

Be consistent with relevant CWPPs and RCW 36.70A.070(6), RCW 36.70A.108, and should consider WAC 365-196-430. The current traffic infrastructure is not responsive to goals and policies for roadways, fixed routes, demand response by public transit, water, truck mobility and bicycle and pedestrian travel.

Comply with the Levels of Service (LOS) for highways of statewide significance, LOS for other state highways and be consistent with the regional transportation plan. RCW 36.70A.070(6)(a)(iii)(B) WAC 365-196-430(2)(e)(v) recommends LOS reflect access, mobility, mode-split and capacity goals. WAC 365-196-430(2)(e)(vi) recommends measurement methodology and standards vary based on the urban or rural character of the surrounding area. Also, balance community character, funding capacity, and traveler expectations through a variety of suggested methods. In urban areas, WAC 365-196-430(2)(e)(vii) recommends some methodologies for analyzing the transportation system from a comprehensive, multimodal perspective.

Provide a multiyear financing plan based on the needs identified in the comprehensive plan, the appropriate parts of which serve as the basis for the six-year street, road, or transit program required by RCW 35.77.010 for cities, RCW 36.81.121 for counties, and RCW 35.58.2795 for public transportation systems. RCW 36.70A.070(6)(a)(iv)(B). WAC 365-196-430(2)(k)(ii) recommends that the horizon year be the same as the time period for the travel forecast and identified needs. If probable funding falls short of meeting identified needs, there is a discussion of how additional funding will be raised, or how land use assumptions will be reassessed to ensure that LOS standards will be met. RCW 36.70A.070(6)(a)(iv)(C). WAC 365-196-430(2)(l)(ii) states that this review must take place, at a minimum, as part of the eight-year periodic review and update and update of UGAs [eight years per 2011 amendments to RCW 36.70A.130]. Several choices for addressing funding shortfalls are provided.

Show coordination efforts, including an assessment of the impacts of the transportation plan and land use assumptions on the transportation systems of adjacent jurisdictions. RCW 36.70A.070(6)(a)(v). WAC 365-196 430(2)(a)(iv) recommends developing transportation elements using the county-wide planning policies to ensure they are coordinated and consistent with the comprehensive plans of other counties and cities sharing common borders.

Under WAC 365-196-440(2)(b) the PNA Board recommends a visioning process to engage the public in identifying needs, evaluating existing recreational opportunities, and developing goals for the parks and recreation element. Clark County must provide an evaluation of facilities and service needs when applying a change. RCW 36.70A.070(8)(b). WAC 365-196-440(2)(d) lists factors to consider when estimating demand for parks, open space and recreational services. The PRC will impede planners as Camp Bonneville planning progresses as it does not meet RCW 36.70A.070 for internal comprehensive plan consistency.



**DNS (B)(15) Public Services**

This action will allow for subdivision and commercial uses requiring additional fire protection and police services.

**DNS (D) Supplemental for Non-Project Actions**

The PNA Board would request the County conduct an EIS as outlined in RCW 43.21C.031 as there are likely significant and cumulative ongoing environmental impacts of this action. We reject the lead agency's determination that this is a non-project action and therefore cumulative impacts need not be addressed at this time.

We request the lead agency carefully consider the range of probable impacts, including short-term and long-term effects as well as direct and indirect impacts including those effects resulting from growth caused by the proposal. Because the PRC is inconsistent with other rural centers it is likely that the present proposal will serve as a precedent for future rural center actions and those impacts should be addressed within an EIS at this time.

Thank you for the opportunity to comment,

The Proebstel Neighborhood Association Board

**From:** [Sally Runyan](#)  
**To:** [Hermen, Matt](#)  
**Subject:** Fwd: Proebstel Rural Center designation  
**Date:** Wednesday, June 13, 2018 7:03:45 PM

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I spelled your last name wrong...  
Please read below message and confirm receipt.  
Thanks,  
Sally

Sent from my iPhone

Begin forwarded message:

**From:** Sally Runyan <[smrunyan@gmail.com](mailto:smrunyan@gmail.com)>  
**Date:** June 13, 2018 at 6:43:21 PM PDT  
**To:** [matt.herman@clark.wa.gov](mailto:matt.herman@clark.wa.gov)  
**Subject: Proebstel Rural Center designation**

Matt,  
Thank you for your time today. As per our discussion, please remove my name from the Proebstel Rural Center petition.

Regards,  
Sally Runyan  
360-903-1551

Sent from my iPhone

June 12, 2018

"In 2014, I am thinking October or November, Marc Boldt came to the Airport on at least two occasions. The first time talking to my airport/grounds-keeper who remembers the visit. He then showed up on a weekend morning, I was in my bathrobe, and I stepped outside to talk. He had in his hand a petition that all of my neighbors were in favor of committing their properties into a Rural Center.

It would help me, help the Airport, and I should come onboard to help my neighbors. I signed. At the time I thought it would interesting to find out more about it and I'd see what happened with just the petition.

I never heard anything more about it. I truly assumed this petition was dead.

I have never received any information from the County regarding planned meetings in 2018. I was not notified of the meeting at Proebstel Church June 11, 2018. My attorney would **never discuss with Marc Boldt, or anyone else for that matter, my financial information.** I am not and was not in financial distress. I am shocked I would singled out and my Airport conveyed as an outcast with violations left to "anyone's imagination". With the help of my attorney, I follow all required inspections, SEPAs, FAA requirements, and anything else I am required to do.

I want all neighbors in the surrounding area to know that I have always worked hard at being a good neighbor. I require my Airport renters to follow stringent rules for takeoffs and landings during hours that will not bother my neighbors and various other rules to be a good neighbor. I am and will always be a good neighbor.

I would like to add that I immediately contacted my attorney and **he confirmed that he did not originate the petition on behalf of the property or me.**

Sally Runyan

Green Mountain Airport

A handwritten signature in black ink, reading "Sally Runyan". The signature is written in a cursive style with large, flowing loops and a long horizontal tail stroke.

**From:** [Hermen, Matt](#)  
**To:** ["Mike Sermone"](#)  
**Subject:** RE: Proebstel Rural Center Opposition  
**Date:** Wednesday, June 20, 2018 4:18:43 PM

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Thank you Mr. Sermone. I will file your email in the proposal's official record for the Planning Commission to consider on July 19<sup>th</sup>.

Thanks,



**Matt Hermen, AICP CTP**  
Planner III  
COMMUNITY PLANNING

564.397.4343



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**From:** Mike Sermone [mailto:mike\_sermone@yahoo.com]  
**Sent:** Wednesday, June 20, 2018 4:01 PM  
**To:** Hermen, Matt  
**Subject:** Proebstel Rural Center Opposition

Hi Matt,

Hope you're having a good day.

I would like to voice my opposition to the PRC on the following grounds-

1. Increased traffic flow and on/off in a already overcrowded Fourth Plain corridor.
2. The availability of dining, vet care, mail, shopping etc. all within three miles of the proposed PRC.

I would be willing to reconsider, if a plan for road improvements were put in place.

Sincerely,

Mike Sermone  
22402 NE 85th Street Vancouver WA 98682.

**From:** [susan\\_rasmussen](#)  
**To:** [Hermen, Matt](#); [Rumpeltes, Jim](#); [Stewart, Jeanne](#); [Olson, Julie - Auto answer](#); [Quiring, Eileen](#); [Blom, John](#); [Boldt, Marc](#)  
**Subject:** Reinstatement of the Proebstal Rural Activity Center  
**Date:** Tuesday, June 19, 2018 4:21:29 PM

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For the public record of the Proebstal Rural Activity Center and the Planning Commission.

Clark County Citizens United, Inc. fully supports the efforts of the petitioners.

Clark County's history, our unique rural character, and CCCU's past court actions play important roles in supporting reinstatement of Proebstal as a rural activity center. Even though 31 historic communities provided goods and services to rural citizens, the county's first 1994 Comprehensive Growth Plan wiped them off the face of the earth. Even though the rural centers had historic value, played vital roles in rural culture, economies, and remain part of our rural character; all 31 rural centers were not acknowledged in the Plan.

Clark County Citizens United, Inc. challenged the legality of this action in the courts and prevailed. The court orders required the county to reinstate rural centers for GMA compliance. One clearly sees the county reinstated only a fraction of the LAMIRDS. The 2014 citizen petition is supported by local history, authentic rural character, and the 1997 Poyfair Remand from CCCU's Superior Court case No. 96-2-00080-2.

CCCU suggests all LAMIRDS be reviewed, in conjunction with the rural areas.

Respectfully submitted,  
Susan Rasmussen for  
Clark County Citizens United, Inc.

**SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY**  
**NO. 96-2-00080-2, APRIL 4, 1997, HONORABLE EDWIN J. POYFAIR**  
**FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER**

**FINDINGS OF FACT**

*Pg. 3, 5. The adopted Plan also eliminated an element of the Community Framework Plan, the concept of rural town centers, known as “villages” and “hamlets.” These rural activity centers were focused on identified pre-existing development patterns and designed to maintain the existing character of rural growth. The centers were eradicated and replaced with a county-wide uniform lot density in the final Comprehensive Plan. Clark County issued a policy memo stating that the reason the rural activity centers were removed from the plan was that previous Growth Management Board decisions appeared to prevent the County from allowing any growth in rural areas. . .*

### **CONCLUSIONS OF LAW**

*Pg. 6, 7. Rural Land Densities. The County’s rural and resource development regulations are inconsistent with the GMA. The GMA requires counties to determine that planning goals are utilized and are a part of the consideration supporting its decisions. One of the planning goals requires a variety of residential densities and housing types, which the Clark County Community Framework Plan met by identifying pre-existing small development patterns in rural areas and creating rural activity centers with a variety of rural densities. The eradication of the centers and their replacement with a uniform lot density violates the planning goal requiring a variety of residential densities. . .*

### **ORDER**

*Pg. 7, Based on the foregoing Findings of Fact and Conclusions of Law, IT IS HEREBY: ORDERED, ADJUDGED AND DECREED that the Clark County Comprehensive Plan and Development Regulations adopted in Ordinance 1994-12-47 on December 20, 1994 are remanded to the Western Washington Growth Management Hearings Board with direction to enter a decision in accord with this Order mandating County action to correct the violations of the GMA identified herein;*

The Honorable Edwin J. Poyfair

**From:** [Hermen, Matt](#)  
**To:** ["susan\\_rasmussen"](#)  
**Bcc:** [Orjiako, Oliver](#)  
**Subject:** RE: Proebstel rural center  
**Date:** Thursday, June 14, 2018 4:38:43 PM  
**Attachments:** [RES2014-06-16\\_Suspension2014-2016AnnualReview.pdf](#)  
[John Proebstel.pdf](#)

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Susan,

The November 2014 was not considered in the 2016 Comprehensive Plan because the attached resolution (2014-06-16) suspended the 2015 and 2016 annual reviews. In 2017, the Clark County Councilors approved a change in Clark County Code 40.560.010 that switched the creation of rural centers from annual reviews to the docket process. Therefore, 2018 is the first year the Councilors were able to approve processing the petition through the Comprehensive Plan docket process.

In 1998 the county approved six LAMIRD's: Amboy, Brush Prairie, Chelatchie Prairie, Dollar Corner, Hockinson and Meadow Glade. 31 potential rural centers were considered, but only six were approved. In 2000, the county approved Farger Lake as a rural center.

Per the attached document (John Proebstel.pdf, pg. 19-20) the Proebstel post office existed from 1902-1911.

Thank you,



**Matt Hermen, AICP CTP**  
Planner III  
COMMUNITY PLANNING

564.397.4343



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**From:** susan rasmussen [mailto:sprazz@outlook.com]  
**Sent:** Thursday, June 14, 2018 2:09 PM  
**To:** Hermen, Matt  
**Subject:** Proebstal rural center

Hello Matt,

I see the petition from the landowners in the Proebstal area was submitted to the county back in 2014. That was well within the time frame to be considered for the 2016 comprehensive plan

update. Why is it just now getting attention for action? What happened to the petition after the 2014 submittal?

Extending back generations, my family has farming history in the Proebstal area. I don't think Proebstal had a post office, but it was considered a rural center and valued for the convenient services and goods that were once provided there. . . it was a resource for the rural community and part of the area's character. When was it removed from being a LAMIRD?

Thank you,  
Susan Rasmussen

Sent from [Mail](#) for Windows 10