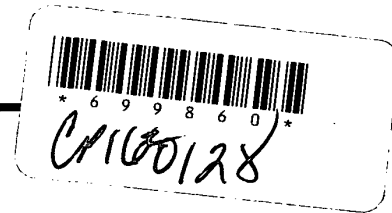


**O'Donnell, Mary Beth**



**From:** Orjiako, Oliver  
**Sent:** Wednesday, June 11, 2014 11:30 AM  
**To:** O'Donnell, Mary Beth  
**Subject:** FW: resource maps 2

FYI.

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**From:** Madore, David  
**Sent:** Monday, June 09, 2014 4:54 PM  
**To:** Orjiako, Oliver  
**Cc:** Carol Levanen ([cnldental@yahoo.com](mailto:cnldental@yahoo.com))  
**Subject:** FW: resource maps 2

Oliver, FYI.

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**From:** Carol Levanen [<mailto:cnldental@yahoo.com>]  
**Sent:** Friday, June 06, 2014 5:45 PM  
**To:** Madore, David; Mielke, Tom; Carol Levanen; Susan Rasmussen; Leah Higgins; Rick Dunning; Rita Dietrich; Jerry Olson; Fred Pickering; Jim Malinowski; Frank White; Benjamin Moss; Lonnie Moss; Melinda Zamora; Nick Redinger; Curt Massie; Marcus Becker; Clark County Citizens United Inc.  
**Subject:** resource maps 2

Dear Commissioners,

**Re: Resource land and soils maps** (This information to be placed into the public record)

Clark County Citizens United, Inc. continues to research information regarding the 2016 update of the Comprehensive Land Use Plan. Much of our recent focus is on maps depicting parcelization, soils and zoning. The maps Clark County is using, to base all of the land use planning in the rural areas, was created in 1994. These maps show that agriculture and forest soils are in the same location. Since one soil tends to be more neutral and the other more acidic, it's not probable that this information is correct. In addition, the county is relying on a 2009 report from the Rural Lands Task Force to decide what land use decisions will occur in all of the rural areas of the Plan. This group was composed of a handful of volunteer members who considered rural lands issues under very strict guidelines. One important guideline was that they were not to consider changing rural zoning in any way. Now, staff is saying that the TF did give definitive recommendations. CCCU, Inc. believes such a process, that allows a handful of unelected people to decide what will be planned for the land of thousands of rural landowners, is most certainly flawed. Landowners were not aware, at the time of the TF work, that their discussions would have such a major impact to their property. There was no public process that clearly explained to landowners what would be happening in 2016 with the TF information.

CCCU, Inc. has had an opportunity to use recent data regarding non-conforming lots, in which it was determined that close to 100% of all rural lands are non-conforming to the existing zones. Those parcels are uniformly smaller than what they are zoned. Soils maps from the *Soil Survey of Clark County* were then examined. That examination clearly demonstrates where prime and preferred resource soils are located. Then a comparison of the parcels, with their current zone, was made to what they should be zoned, according to the mandates of the Growth Management Act regarding

resource lands. The zoning was then changed to make the parcels conforming, while placing them in the correct soils and resource category. The result was that CCCU, Inc. created approximately 1,500 more 5, 10 and 20 acre resource parcels than what was previously designated, with most of these located in the forest soils. Since very little soil in Clark County is prime or preferred agriculture soil, approximately 80 additional ag parcels were created in the process. One might argue that if the parcel sizes for the rural land zoning were reduced, it would create many more additional lots. This is not true, because the rural parcels already exist in a smaller parcel size than their existing zoning. Such a change would only make them conforming.

There is serious concern as to where Clark County originally got their information for the maps in 1994. What indicated prime ag and forest soils and how did they come to the information that is depicted in their soils maps? What scientific document was used for this information? CCCU, Inc. determines that the county maps are incorrect. All of these years, the county, focus groups, commissioners and the public assumed the maps had some sort of legitimate scientific process that determined such soils, which allowed these maps to be correct. But, our latest information indicates that is not the case.

The county must correct these maps, using the best available science and data regarding soils in Clark County, to create an accurate interpretation of where agriculture and forest soils are located in the county. Only then, can the county correctly designate resource lands, according to the GMA, with long term commercial significance on prime and unique soils to assure the goal of economic viability, while properly designating the remaining land as rural.

Sincerely,

Carol Levanen, Ex. Secretary  
Clark County Citizens United, Inc.  
P.O. Box 2188  
Battle Ground, Washington 98604