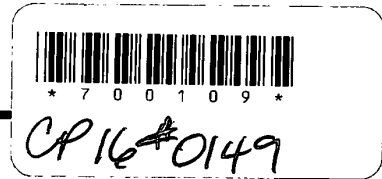


O'Donnell, Mary Beth



From: Carol Levanen <cnldental@yahoo.com>
Sent: Thursday, June 19, 2014 1:54 AM
To: Madore, David; Barnes, Ed; 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: Population Projections (For the public record)

Dear Commissioners,

On behalf of Clark County Citizens United, Inc. I have listened to the tape of the Commissioner Work Session of June 18, 2014. There was discussion regarding the OFM population projections and population allocations of 90% in the urban area and 10% in the rural area. The population projections are an estimate only and are not fixed numbers. The Washington State Court of Appeals sided with CCCU, Inc. with it's ruling that the OFM number was a planning tool for the urban areas and not a cap on the rural area. In the 2004 Comprehensive Land Use Plan the population projection number was 584,310. The current number chosen for 2016 is less than that. If the commissioners are truly interested in providing new employment opportunities, new growth must occur. In order to accept and sustain that growth, the county must plan ahead of the growth. Currently, the county is lagging behind and being reactive instead of proactive. Artificially preventing growth in the rural lands is not the answer.

The dictation of the 90/10 split seems to have surfaced in 2004. But, the population ratios for urban and rural have historically occurred at closer to a 80% to 20% ratio. That trend continues today. It is interesting to note that the 2004 Plan discusses on Page 1-4 that " *Approximately 90 percent of population growth over the 20-year planning horizon is expected to occur in designated urban growth areas, with 10 percent of the remainder to occur in unincorporated rural and natural resource lands.* Yet on page 1-5 it says " *About 82% of all housing units are located within the adopted urban growth areas.* This would indicate that the remaining 18% of the growth occurred in the rural area. In the first pages of the county's BERK rural lands report, it also confirms the 80/20 ratio. Why the Comprehensive Plan discusses the 90/10 ratio is not explained in the documents. It appears to simply be an artificial number with no rational or statistical reason for it's existence.

Such numbers as the OFM projections can easily be manipulated to produce an artificial outcome that has no relationship to historical trends or economic needs of the community. It was used in the past as a no growth tool to prevent growth in the rural areas, and is still in place today. But, the statistics demonstrate that such a plan doesn't work. Growth in the rural areas actually outpaced the urban areas by a two to one ratio. Realistic numbers need to be applied both in the OFM populations projections and the land use ratios.

The Growth Management Act requires the county to designate agriculture, forest and mineral land according to set criteria, first, then designate the remaining rural land. The GMA indicates that rural land needs to be zoned according to historical trends, rural character, and economic viability and that it not be urban in nature. If the county used the correct designations for agriculture and forest lands according to the correct criteria and their parcel sizes, with the remaining rural land, according to existing parcel sizes, there would be very little increase in rural parcels. But, it would create many more resource lots by shifting the existing rural parcels into a resource category. The Office of

Financial Management does not dictate parcel sizes. If the urban areas increased their parcel sizes for urban lots to be more desirable, the population ratio within the rural areas would change, also. Either way, the 10% allocation for rural land has already been exceeded and is not a realistic number. The county's proposal to force land owners to re-combine their lands and place rural reserve areas over the rural zoned parcels in the name of preserving agriculture is fatally flawed and a certain departure from historical trends and the rural character of Clark County's rural areas.

Sincerely,

Carol Levanen, Ex. Secretary
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