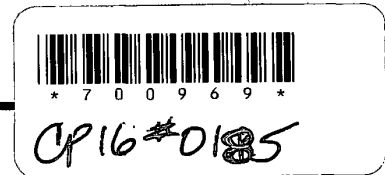


O'Donnell, Mary Beth



**From:** Carol Levanen <cnldental@yahoo.com>  
**Sent:** Monday, July 21, 2014 1:50 PM  
**To:** Barnes, Ed; 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:** Rural lands survey - information for the record

July 20, 2014  
Clark County Board of Commissioners  
P.O. Box 5000  
Vancouver, Washington 98666

Re: **Rural Lands Review - Resource Lands - BOCC Work Session, Sept, 25, 2013**

Clark County Citizens United, Inc. has reviewed a document presented by staff to the Board of Commissioners on September 25, 2013 in a work session. The title of the survey was **Rural Lands Review - Resource Lands**. It is a numerical chart that is broken into columns for zoning, parcel size, number of parcels and acres. The numbers are interesting and, quite frankly, confusing. The result is, they don't add up, except for the non-conforming lots.

The Ag-20 zone columns say there are 2,567 total parcels totaling 31,301 total acres. This demonstrates the average parcel size is 12.12 acres. But adding up the acres in the acres column, totals 48,372 acres. So which is it? To explain it more simply, one only needs to know the total parcels, total acres and the average parcel size. It is important to note the parcels that are less than six acres, which number 1,461 and total 4893 acres. This amounts to an average lot size of 3.34 acres. These small parcels have been given the wrong zone for their size in the Comp Plan and have been forced to be non-conforming. They need to be changed.

The Fr-40 zone columns say there are 2,405 total parcels totaling 29,672 total acres. This demonstrates the average parcel size is 12.33 acres. But adding up the acres in the acres column, totals 89,170 acres. So which is it? To explain it more simply, one only needs to know the total parcels, total acres and the average parcel size. It is important to note the parcels that are less than five acres, which number 669 and total 1,415 acres. This amounts to an average lot size of 2.11 acres. In the greater than five acre column there are 1,736 parcels that equal 28,257 acres, with an average parcel size of 16.27 acres. Of the total number of lots of 2,405, 2,405 parcels are much smaller than the zone. These small parcels have been given the wrong zone for their size in the Comp Plan and have been forced to be non-conforming. They need to be changed.

The Fr-80 zone columns say there are 1,474 total parcels totaling 130,025 total acres. This demonstrates the average parcel size is 88.21 acres. But adding up the acres in the acres column, totals 419,281 acres. So which is it? To explain it more simply, one only needs to know the total parcels, total acres and the average parcel size. It is important to note the parcels that are less than twenty acres, which number 629 and total 4,925 acres. This amounts to an average lot size of 7.82 acres. These small parcels have been given the wrong zone for their size in the Comp Plan and have been forced to be non-conforming. They need to be changed.

There is a note that the lots are tax parcels and not necessarily "buildable" lots. They will

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require a legal lot determination. How convenient. First create non-conforming lots, then charge the landowner to prove they are legal. The majority of the lots created prior to a moratorium slapped on the rural lands in 1993 were legally created. After that, the short plat and subdivision ordinances required the lots to be legal by way of regulation. This was just another way to prevent land owners from building on their land by creating a regulation fear, adding additional costs and wasting time in the process.

With such charts as the **Rural Lands Review**, it is difficult to give credibility to the author or authors of the document. Such confusing information does nothing to aid the commissioners in knowing what is happening in the rural and resource lands of Clark County. Any credible information in the charts support what Clark County Citizens United, Inc. has defined as appropriate zones for rural and resource lands. That information has been submitted as testimony in the public record. Current zoning maps show resource lands that do not comply with GMA directives and charts such as this, confirm the same. Correcting resource zoning with smaller parcel sizes will make the majority of the lots in rural Clark County, conforming, while giving recognition to true productive resource lands, according to the mandates of the Growth Management Act.

Sincerely,

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