



CP 16# 0495

Clark County Board of Councilors
P.O. Box 5000
Vancouver, Washington 98666

RECEIVED

JAN 20 2015

BOARD OF
COUNTY COUNCILORS

January 17, 2015

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Re: 2016 Comprehensive Plan Update - Board Work Session - January 21, 2015

Clark County Citizens United, Inc., is a grass roots 503-C4 non-profit organization of approximately 6,000 landowners that have been participating in the GMA Comprehensive Plan process since 1994. It's diverse 17 member Board of Directors represents expertise in rural, resource and urban land issues. CCCU, Inc. legal aid comes from membership donations and all other activity is volunteer. Our mission is to serve, protect and preserve the rural interests of present and future landowners.

CCCU, Inc. has many concerns regarding the agenda for the Board of Councilors work session, scheduled for January 21, 2015, to consider the 2016 Comprehensive Plan Update. In the **Progress to Date**, presented by staff, CCCU sees nothing to address concerns that were filed in the record regarding rural and resource zoning and resource land soils. There is no mention of a rural and resource lands review and update in this report. Such a review should be included in any comprehensive update of a twenty year plan, as conditions in these areas change. It is imperative that rural and resource lands be thoroughly examined in the new 20 year plan and one alternative does not meet that test.

Since 2013, CCCU, Inc. has presented compelling testimony regarding existing conditions, new legislation and recent court decisions, that indicate a need for more substantial changes to rural and resource lands, than status quo or one alternative presented to the Board, which allows very little change to these areas. Given the complexity of these lands over the last 20 years, the Councilors cannot make an informed decision over what these lands should be, with the limited information given in the alternatives submitted by staff. More than one alternative needs to be considered for rural and resource land, to allow for a full comprehensive review of changes that need to be considered. If this does not happen, the plan will be obsolete before it is even adopted.

The staff presentation for the work session states in the **Comprehensive Plan Overview** that "*The county's comprehensive plan is currently in compliance with the GMA*". This represents an interpretation of the Western Washington Growth Management Hearings Board and not an interpretation of the Superior Court and the Court of Appeals specific to this plan, or other court decisions that would affect this plan. Clark County Citizens United, Inc. asks the Councilors to reject the limited presentation from staff and consider adding more alternatives for rural and resource land that would more closely represent current concerns and conditions which need a more comprehensive review in the SEIS.

Sincerely,

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