

Schroader, Kathy



From: Orjiako, Oliver
Sent: Tuesday, August 25, 2015 10:40 AM
To: Euler, Gordon; Alvarez, Jose
Cc: Schroader, Kathy
Subject: FW: Important data ignored in the supp. draft EIS - For the Public Record

All:

FYI. Kath for the index. Thanks.

Oliver

From: Carol Levanen [mailto:cnldental@yahoo.com]
Sent: Tuesday, August 25, 2015 10:05 AM
To: Madore, David; Stewart, Jeanne; Mielke, Tom; Orjiako, Oliver
Subject: Fw: Important data ignored in the supp. draft EIS - For the Public Record

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

From: susan rasmussen <sprazz@outlook.com>
To: Carol Levanen <cnldental@yahoo.com>
Sent: Tuesday, August 25, 2015 9:59 AM
Subject: Fw: Important data ignored in the supp. draft EIS

Sent from Windows Mail

From: susan rasmussen
Sent: Thursday, August 20, 2015 6:45 PM
To: susan rasmussen, Carol Levanen, Jim Malinowski

This 2016 comprehensive plan update is required to assure that the county's plan adequately provides for growth, reflects community desires, changing conditions and trends. It is important to the citizens and property owners to have an opportunity to express their concerns, goals, and policies for the future in order to maintain some logical control of land use policies that impact their lands. CCCU is grateful to this Board for allowing us the opportunity to present a rural perspective.

CCCU envisions growth that will maintain the continuity of our unique rural character, honor rural cultural practices, and enhance the quality of life while protecting the property rights of the rural citizens.

It is very evident that rural goals and policies were underdeveloped in plans 1, 2, and 3. There was a need for additional work on another alternative plan than gives balance by providing more importance to private property rights. Alternative 4 was written to better reflect this balance.

CCCU has ensured that an entire body of record has been brought before the Board of Clark County Councilors that supports our policies and goals. This record is a necessary tool that provides the county with substantial data for evidence. This record is intended to be used as a resource. However, important data from that record of evidence is absent in the supplemental draft EIS. The evidence that is present appears to be there arbitrarily.

This is an important issue as the county is required to show its work --- demonstrate conclusive evidence in order to justify changes to the county growth plans. The planners should have relied on the data provided in the public record, and deferred to that data in the draft supplemental EIS. By ignoring the data, the planners are dismissing key pieces of evidence that supports policies and conclusions proposed in Alternative 4. Simply put, the public record supports proposals written in Alternative 4.

I have taken the liberty of outlining some key elements supporting Alternative 4 that are absent in the draft EIS; but supported in the record:

- _ USDA Census of Agriculture, 2012, Clark County profile
 - _ The ag. industry has experienced profound changes over the years. The Census provides the data to subordinate the need to diversify the county's rural economic base.
 - _ Most Clark County farms are not economically viable
 - _ Contributes less to the overall economy of the region
 - _ Farms have gone from small to even smaller.
 - _ Employs less than 1% of the workforce

- _ USDA Census of Agriculture, 1950, (historical perspective to establish conditions and trends).
- _ Analysis of the Agricultural Economic Trends and Conditions in Clark County, Globalwise, Inc., April 16, 2007
- _ Lewis County court case (Lewis County's comprehensive plan was greatly influenced by the diminishing dairy farms migrating out of the area)
The courts supported the county's efforts. Lewis County defined the needs of the changing agricultural industry and designated those lands best suited to meet those needs. "The notion that a County must designate all land capable of being farmed is simply wrong." This policy also applies to forestry.

- _ NRCS 1972 Soils Manual, Clark County Profile
 - _ CCCU's soils maps by Clark County GIS
 - _ Clark County metadata for resource lands, "Ariel photography, staff reports."

- _ Pierce County (Hearings board case.) The county used the predominant parcel size when designating ag. lands. The court concluded the predominant size of local farms was instructive.
- _ Wa. State Designated Forest Land, Dept. of Revenue, May 2014 Report (intent of the 5 acre minimum forest land to qualify for the state current use taxation program). "The land must be consistent of a single parcel of 5 acres or more."
- _ Small Forest Landowners Database Validation & Data Analysis Study, Report for Clark County, Wa., Oct. 21, 2002. Submitted by the Rural Technology Initiative, University of Washington, College of Forest Resources.
 - _ 78% of the forested Clark County lands are owned by private landowners
 - _ The state trend is 50% privately owned woodlots

- 93% of the county F-40 lots are non-conforming lots. 5 acre lots predominate.
 - Census of Clark County parcels in agriculture, rural , and forestry zones
 - Predomination of non-conforming lots to their zone sizes
 - Lingering issues from CCCU's court case
 - “The result is a plan that gives little regard for the realities of existing rural development in direct contradiction of the terms of the GMA.”
The Honorable Edwin J. Poyfair, Superior Court Judge
 - United States Census Bureau: Clark County Profile
 - CCNRC Green Alternative Details, John S. Karpinski, March 16,1994
 - Letter to Clark County, Peggy Scolnick, Clark County Planning
- The County’s comprehensive plan of 1994 was written in collaboration with the Clark County Natural Resources Council, and Friends of Clark County. This exclusive policy eliminated the concerns of the rural landowners. The result is an unbalanced plan that fails to recognize the importance of private property rights, a GMA planning goal.

Sincerely,
Susan Rasmussen for
Clark County Citizens United, Inc.