

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

September 3, 2015  
For the Record

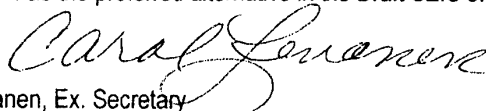
Clark County Citizens United, Inc. extensively participated in the 2016 GMA Comprehensive Plan update and believe Alternative 4 is the only alternative meeting the rural and resource goals of the Growth Management Act, 1993 Framework Plan and court orders saying the county cannot disregard existing development in place prior to 1994. The DSEIS and existing resource maps don't meet the GMA and Framework criteria, nor do Comprehensive Plan proposals meet 1993 Community Framework Plan goals, the GMA or the court orders. Testimony on these items was submitted in the record. The Draft SEIS does not demonstrate consistency but it does demonstrate bias against Alternative 4. Adjustments are needed to the document to comply with all parameters, using accurate logistics and scientific data. Most parcels in Alternative 4 have infrastructure, therefore, the environmental impact is minimal and similar to Alternative 1.

Rural and Resource land has been locked in status quo over 20 years, but housing demand in these areas is growing. The market can't meet the demand. The Framework Plan says small farms and acreage home sites are to be maintained for diverse life style opportunities for present and future generations. It says the responsibility of the community is to strive for the highest quality of living environments for all citizens and shall recognize existing development. The Economic Element of the Framework Plan says to promote area wide economic environment which is conducive to the well being of the region based on private ownership of property and the freedom of the person to choose his own profit and well being. The rural and resource economic climate is suffering as a result of the 1994 Comprehensive Plan and only Alternative 4 can help.

The purpose for the GMA 1993 Framework Plan was to allow cities, as well as the county to create their own growth policies and plans. The May 26, 1993 Community Framework Plan, says the Plan does not change the existing (1979) comprehensive plan or zoning of Clark County. It says outside the urban areas, land is predominantly rural with farms, forests, open space, and large lot residences and most of northern Clark County would remain as it was then. But the 1994 Comprehensive Plan disregarded the 1993 Framework Plan and locked many thousands of acres of rural and resource land into very large lot zoning. The 1993 Framework Plan said the county shall recognize existing development and provide lands which allow rural development in areas which are developed or committed to development of a rural character. That didn't happen. Alternative 4 is the only Alternative that would recognize these requirements.

The 1977-1979 Framework Plan and subsequent 1993 Plan, discussed resource lands at length and soil guidelines were set. In Section C of the Framework Plan, those soils are listed. CCCU submitted this into the record. Prime and good soils Class I and II were the goal. CCCU has a 1980 county map that shows where those soils are located. The GMA continued to require prime resource soils, using the NRCS Clark County Soils Manual as a guideline. But, in 1994 the county disregarded that criteria and simply used an aerial photo and staff interpretation to determine soils by looking at tree or field cover. This was done to encompass far more land than appropriate, to meet an unauthorized population projection formula. This formula was rejected in the courts. The NRCS resource soils maps submitted by CCCU, match the GMA criteria and 1980 soils map that used the Framework Plan guidelines. The 1994 Plan resource soil maps do not meet that test. Only Alternative 4 allows the opportunity to recognize existing parcels for what they are, not what staff and commissioners wanted them to be in 1994. CCCU urges the Councilors to choose Alternative 4 as the preferred alternative in the Draft SEIS of the 2016 Comprehensive Plan update.

Sincerely,



Carol Levanen, Ex. Secretary  
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