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November 9, 2015

Board of Clark County Councilors
Clark County Planning Commission
Oliver Orjiako, Director of Clark County Community Planning

Dear Councilors, Planning Commission and Dr. Orjiako,

Friends of Clark County wishes that these statements be entered into the record.

Regarding changing the planning assumptions, those planning assumptions are both discretionary and mandatory. For example, it is mandatory that a county plan within the number range given by OFM but it is discretionary which number that is used within that range. If any of you have time to go back through the Planning department records, you will see that we not only have been planning since 2007, we have been adjusting the 2007 planning model for the past 2 years (<http://www.clark.wa.gov/planning/2016update/processdocuments.html>). Please remind the people that this process started long ago and has been vetted--http://www.clark.wa.gov/planning/2016update/documents/RES_2014-0617_Allocation-PV_PA.pdf. However, now Councilor Madore wants the public to make a decision on his completely new assumptions, assumptions that are currently inopposite to the trained, effective and experienced eye of staff.

The OFM number is correct

Even if there has been a slight change in growth rate by OFM. The law requires we select a population forecast at the front end and plan accordingly. The county did that and, based upon that, all of the cities planned accordingly. Any change to that number requires that the process be restarted

Each step of the process has been labor intensive and now Mr. Madore wants to cram 2 years of planning into 6 weeks for the public to take his new numbers, “scrub” his new numbers and make sure that he is not giving us the inaccuracies he is claiming that staff is giving him. I think we frame it this way —Councilor Madore, you are in power, you are in control, you have even been the chair, yet you are saying that for almost two years you voted for, and supported, changes to the comprehensive plan that you have just recently decided are not “truth”. You, whose JOB it is to vet these numbers, apparently needed 2 years to figure out these numbers. Yet now you expect the average citizen, citizens who have day jobs, family responsibilities and more to either accept your new assumptions (and by the way you are not a planner) and reject what has been vetted and approved by professional planning staff and adopted by multiple boards of commissioners over the years. It is unfair to expect that the citizens will take your word and none of us who have been actively participating in this process for over two years expected that it would change overnight in total contravention to the processes that have been used in this county for decades.

A county planning under the GMA must establish a “public participation program identifying procedures providing for early and continuous public participation in the development and amendment of comprehensive land use plans.” RCW 36.70A.140; accord RCW 36.70A.070 (“A comprehensive plan shall be ... amended with public participation as provided in RCW 36.70A.140.”) A county's procedures must provide for broad dissemination of proposals, opportunity for written

comments, public meetings after effective notice, open discussion, communication programs, information services, and consideration of and response to public comments. RCW 36.70A.140; accord JCC 18.45.010(2)

The Planning Commission Should Not Meet On Madore's New Proposal

The public and the planning commission have had insufficient time to vet his new plan which changes planning assumptions that have been used for decades, been approved by a myriad of Planning Commissions and Board of County Commissioners and found compliant by growth boards and the courts. It is a violation of the original resolution passed by the county regarding the planning process and the public participation elements and it reverses multiple resolutions that have been passed by the previous BOCC and this BOCC. To go back and document it all in the time frame now jammed down the citizen's throats creates a false record and violates the resolutions passed and in place.

No market factor is to be used in rural development

The GMA sets for the rules and regulations that govern planning. Under 365-196-310(2)(e) (which is under the title "Urban Growth Areas"), GMA requires use of a market factor (ours is 15%). Madore wants to use a 7.5% MF in rural area but the law does not allow use of MF for rural areas and should be rejected.

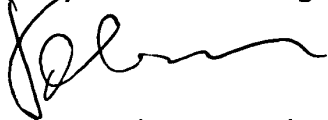
Friends of Clark County is dedicated to preserving the quality of life in our region, keeping our urban areas comfortable and safe, protecting our valuable farm lands, and seeing that taxpayer dollars are spent wisely for the good of all citizens.

This alternative 5, as it has evolved into from alternative 4,

does none of that. It benefits a select group of landowners at the expense of the taxpayers who are paying for all the extra staff time, the infrastructure that will be needed and sacrificing the public services like sheriff and fire programs if this is passed, while losing many of the advantages of living in Clark County that we cherish.

In the spirit of the will of the people who voted for a home rule charter that changes the way we do governance in Clark County and who just last week voted for two new county councilors to take office in January 2016, FOCC requests that this proposal be set aside for the remaining few weeks of 2015 and not be addressed until the new board is installed in January, 2016.

Thank you for hearing our concerns.

A handwritten signature in black ink, appearing to read 'Val Alexander', written over the printed name below.

Val Alexander, Board Member,
Friends of Clark County