



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

January 26, 2016

Clark County Citizens United, Inc. has lobbied the commissioners for changes to rural and resource zoning since 1994, with testimony, a 1994 appeal to WWGMHB, a 1995 - 1997 appeal to two superior courts and a 1997 defense of court orders, in the Court of Appeals, Div. II. Nothing happened. CCCU lobbied for lot size reduction in 2004 and 2006 for the same reason. Rural and Resource zones are incorrectly designated and must be corrected. CCCU lobbied again in 2013, for lot reduction to match actual lot sizes of rural and resource lands, using predominant parcel size, area wide, according to the GMA. Staff gave commissioners three "do nothing" alternatives consisting of minor changes, in Alt 2 and 3. Alternative 2 made changes to agriculture and forest land, reducing some 20 acre ag lots to 10 acre and 40 acre forest lots to 20 acre. But, the majority of those lots are already smaller than the proposal. The three alternatives don't address rural and resource lands adequately and CCCU proposed a fourth alternative that did. Alternative 4 is now being proposed to be removed from the adopted Preferred Alternative, thereby leaving the rural lands static and depressed, for another 20 years.

When staff was asked where proposed 10 and 20 acre sizes came from, the public was told a 2008 - 2010 Rural Lands Task Force. The enclosed final recommendation from that Task Force, does not state those findings. The county mentions another Task Force and Agriculture Preservation Advisory Committee, but the public was not adequately informed of the work this committee did, nor what its purpose was. The 2008 Task Force recommended five acre agriculture zones and five acre forest zones.

In the EIS Scoping Comments Index of October 2005, John Karpinski says, **"CCNRC must advise the County that its range of alternatives is based on an erroneous premise, and is fatally flawed under SEPA, as its range of alternatives are essentially "do nothing"... This is not allowed by law. First the Scoping Notice erroneously assumes that the maximum study area will be based on the "assumptions" and "the policy directions"... However, past history has shown, these planning assumptions are as pliable as the decision makers who have drafted them. So it is unlikely that the planning assumptions ...attached to the Scoping Notice will end up being the final assumptions....yet the Scoping and the Alternatives are based on them, a fatal flaw. Even if this linkage between the assumptions and the alternative is disconnected, the EIS is still an illegally narrow range of alternatives. The EIS should have the widest range of alternatives, particularly on government non-project proposals. ..the only alternative presented here is the no action alternative... Why is a broad range of alternatives necessary? As Robert Settle indicates in his , The Washington State Environmental Policy Act - The Legal and Policy Analysis at 14.01 (2) (b) "Open minded, imaginative design and consideration of alternative courses of agency action is crucial to SEPA's ultimate quest... Unless agencies venture beyond their traditional modes of operation, the mere preparation of impact statements environmentally analyzing customary agency conduct would be little more than costly ritual without practical effect."** CCNRC hereby request reasonable alternatives be added...." At Index #5 - Definition of Alternatives for EIS for Comprehensive Plan Revision, October 31, 2005, Memorandum from Marty Snell and Marliä Jenkins, to Clark County Board of Commissioners - **"In preparation of the Environmental Impact Statement, the county must define meaningful alternatives."** This is the first time CCCU, Inc. and Mr. Karpinski agree. Alt 4 needs to stay in the Preferred Alternative, for compliance to SEPA and the GMA.

Sincerely,

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



Rural Lands Task Force recommendation

Summer 2008

The Clark County Comprehensive Growth Management Plan includes a Rural Element. In early 2008, the Board of Clark County Commissioners began a review of rural planning issues by appointing a Rural Lands Task Force. The task force of rural residents is recommending a local definition of rural character and a vision to guide an update to the Rural Element of the growth plan. Below is the recommendation, followed by more information about the project.

For Clark County, rural character is:

- Where the natural landscape predominates over the built environment;
- Where there is small acreage farming and forestry;
- Where provisions have been made to protect the land for future generations;
- Where there are modern economic opportunities to live and work in the rural area, particularly in and around rural centers;
- Where fish and wildlife habitats are valued;
- Where mining is a land use;
- Where urban services are not generally provided; and
- Where natural surface water and recharge areas are protected.

Rural vision statement

Clark County is to be positioned for present and future uses using fair, consistent and creative zoning. Specifically:

- Ease regulations and provide tax incentives for encouraging small scale agriculture and forestry;
- Expand cluster development in agricultural and forest zones;
- Create 5-acre agriculture and forestry homestead zones;
- Expand uses of rural centers to enhance their economic viability and community identity;
- Graduate lot sizes radiating from rural centers;
- Create a Zoning Fairness Board;
- Protect wetland and wildlife habitats;
- Allow and encourage alternative energy projects;
- Facilitate creation of local utility districts in and around rural centers;
- Expand recreational opportunities.



Rural Lands Task Force recommendation

Summer 2008

The Clark County Comprehensive Growth Management Plan includes a Rural Element. In early 2008, the Board of Clark County Commissioners began a review of rural planning issues by appointing a Rural Lands Task Force. The task force of rural residents is recommending a local definition of rural character and a vision to guide an update to the Rural Element of the growth plan. Below is the recommendation, followed by more information about the project.

For Clark County, rural character is:

- Where the natural landscape predominates over the built environment;
- Where there is small acreage farming and forestry;
- Where provisions have been made to protect the land for future generations;
- Where there are modern economic opportunities to live and work in the rural area, particularly in and around rural centers;
- Where fish and wildlife habitats are valued;
- Where mining is a land use;
- Where urban services are not generally provided; and
- Where natural surface water and recharge areas are protected.

Rural vision statement

Clark County is to be positioned for present and future uses using fair, consistent and creative zoning. Specifically:

- Ease regulations and provide tax incentives for encouraging small scale agriculture and forestry;
- Expand cluster development in agricultural and forest zones;
- Create 5-acre agriculture and forestry homestead zones; *
- Expand uses of rural centers to enhance their economic viability and community identity;
- Graduate lot sizes radiating from rural centers;
- Create a Zoning Fairness Board;
- Protect wetland and wildlife habitats;
- Allow and encourage alternative energy projects;
- Facilitate creation of local utility districts in and around rural centers;
- Expand recreational opportunities.



**Rural Lands Task Force
recommendation**
Summer 2008

The Clark County Comprehensive Growth Management Plan includes a Rural Element. In early 2008, the Board of Clark County Commissioners began a review of rural planning issues by appointing a Rural Lands Task Force. The task force of rural residents is recommending a local definition of rural character and a vision to guide an update to the Rural Element of the growth plan. Below is the recommendation, followed by more information about the project.

For Clark County, rural character is:

- Where the natural landscape predominates over the built environment;
- Where there is small acreage farming and forestry;
- Where provisions have been made to protect the land for future generations;
- Where there are modern economic opportunities to live and work in the rural area, particularly in and around rural centers;
- Where fish and wildlife habitats are valued;
- Where mining is a land-use;
- Where urban services are not generally provided; and
- Where natural surface water and recharge areas are protected.

Rural vision statement

Clark County is to be positioned for present and future uses using fair, consistent and creative zoning. Specifically:

- Ease regulations and provide tax incentives for encouraging small scale agriculture and forestry;
- Expand cluster development in agricultural and forest zones;
- Create 5-acre agriculture and forestry homestead zones;
- Expand uses of rural centers to enhance their economic viability and community identity;
- Graduate lot sizes radiating from rural centers;
- Create a Zoning Fairness Board;
- Protect wetland and wildlife habitats;
- Allow and encourage alternative energy projects;
- Facilitate creation of local utility districts in and around rural centers;
- Expand recreational opportunities.

Schroader, Kathy

From: Tilton, Rebecca
Sent: Wednesday, January 27, 2016 11:43 AM
To: Orjiako, Oliver, Schroader, Kathy
Subject: Comp Plan Comments from 01/05/16 (Levanen & Rasmussen)
Attachments: Rasmussen_Susan_012616CompPlanComments.pdf; Levanen_Carol_012616CompPlanComments.pdf

Hello,

For your records, please see the attached written testimony from Carol Levanen and Susan Rasmussen (received during public comment on Jan. 26, 2016).

Thank you,
Rebecca

Rebecca Tilton, Clerk of the Council
Board of County Councilors
1300 Franklin Street
PO Box 5000
Vancouver, WA 98666-5000
PHONE: 360-397-2232, ext. 4305 | E-MAIL: Rebecca.Tilton@clark.wa.gov