

MAR. 8, 2016 = Rec'd from Carol Levanen - RUT
cc'd = Bocc; Orjako; Schroeder

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

March 8, 2016



Dear Councilors,

Approximately January, 2014, Clark County began creating a 2016 Comprehensive Plan SEIS Preferred Alternative, which was adopted on November 24, 2015. The Preferred Alternative used current 2004 maps to reduce parcel sizes in rural, agriculture and forest zones to reflect existing parcels, using predominant parcel size, area wide. Information was taken from GIS, landowners, foresters, farmers, water purveyors, civil engineers, open houses, USDA data, environmental engineers, and other resource data. The adopted November 24, 2015 Preferred Alternative was a composite of select prior Alternative 1, 2, and 3 data and the new information for Alternative 4. The county deemed the process and substance as legal, under the GMA, and chose it as the Preferred Alternative in the FSEIS. Clark County Citizens United, Inc. continues to claim an erroneous process was used since 1994 to meet OFM population projection numbers and to designate resource lands. CCCU wants changes made to erroneous resource maps and calculations used for county planning, since that time. The OFM numbers, RCWs, WACs, prime NRCS soils and commercial significance criteria were never used correctly in the past. Changes to population projections, resource soils, maps, and designations were not considered in the 2016 DSEIS and still need to be corrected.

On February 23, 2016, all of the adopted Preferred Alternative, with maps and charts, was repealed by three of the five councilors, three months before adoption of the Plan. Two of the councilors were newly elected and took office on January 1, 2016. Neither of them had attended the majority of hearings, work sessions or open houses conducted for the last two years and likely had not had an opportunity to view all of the testimony. To a degree, the same was true for the third councilor. After clearing the "slate", those three Councilors created a new Alternative, at the same hearing on the same day. The new Alternative was based on old information compiled by staff prior to 2014 and Planning Commission recommendations, that used limited information under time constraints. The three councilors had no substantial legal basis for their actions and had no additional public process, data, research, expert testimony or other appropriate means to create the new Alternative. In fact, public testimony for the Preferred Alternative process was closed on February 18th and no additional testimony was to be considered by the Council on February 23.

Clark County Citizens United, Inc. believes the process for the new Preferred Alternative, adopted on February 23, 2016 was erroneous and does not comply with the GMA. Two of the three councilors, had no opportunity to review two years of public testimony and the third councilor had only limited knowledge of what transpired. But, on February 23, 2016 they used this limited knowledge to create a whole new Preferred Alternative in three hours. Clark County Citizens United, Inc. asks the Council to reconsider their actions, given the Record, and return the previous Preferred Alternative map, Alt 4-a, Alt 4-b, Alt 4-c and Alt 4-abc with all notes and tables to each element, to the newly adopted Preferred Alternative.

Sincerely,



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

028616

Schroader, Kathy

From: Tilton, Rebecca
Sent: Wednesday, March 09, 2016 12:55 PM
To: Orjiako, Oliver, Schroader, Kathy
Subject: Comp Plan Comments
Attachments: Rasmussen_Susan_030816CompPlanComments pdf, Levanen_Carol_030816CompPlanComments pdf

Hello,

For your records, please see the attached written testimony received from Carol Levanen and Susan Rasmussen on Mar. 8, 2016

Thank you!
Rebecca

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