Dear Commissioners,

Time and again, the planning staff states in their reports and discussions, that the GMA requires Clark County to preserve, protect and enhance resource lands. The GMA does have that language, but not within the context of 36.70A directives regarding resource land designations. That language is actually in another section of the GMA under the heading, VOLUNTARY STEWARDSHIP PROGRAM, where it says, "36.70A. 700 (2) (a) Promote plans to protect and enhance critical areas within the area where agricultural activities are conducted, while maintaining and improving the long-term viability of agriculture in the state of Washington and reducing the conversion of farmland to other uses:...". Otherwise, there is no such language regarding resource lands in the GMA, for the purpose of complying with the resource land use mandates. This program is a voluntary program, and in 36.70A .760, any landowner who participated in the voluntary activity, can withdraw their participation. Whereas, the specific criteria for long term commercial significance, primarily devoted to commercial production, soil composition and other directives for resource lands are mandatory elements, under the GMA.

Wording and how the county uses those words in the text has been very interesting. The Growth Management Act is a very large comprehensive document that encompasses all areas of land use, development and land taxation in the state of Washington. There are many sections to the document, with many titles. The particular text that the commissioners need to be concerned about are the minimum standards mandated language involved in Comprehensive Land Use Planning, and not text taken from a completely different topic that focuses on voluntary activities by a landowner.

In the future, Clark County Citizens United, Inc. hopes to see the planning staff be as precise and accurate as possible, when it refers to text in the GMA. Clark County is under certain mandates to designate resource lands, but they have no obligation to voluntary programs mentioned in the GMA, and should not claim the text from these sources in the Plan.
Sincerely,

Carol Levanen, Ex. Secretary
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