From: Carol Levanen [mailto:cnldental@yahoo.com]
Sent: Monday, October 13, 2014 10:56 AM
To: Silliman, Peter; Carol Levanen; Susan Rasmussen; Leah Higgins; Rick Dunning; Rita Dietrich; Jerry Olson; Fred Pickering; Jim Malinowski; Frank White; Benjamin Moss; Lonnie Moss; Melinda Zamora; Nick Redinger; Curt Massie; Marcus Becker; Clark County Citizens United Inc.; Barnes, Ed; Madore, David; Mielle, Tom
Subject: Clark County Comp Plan and the Clallam County Court of Appeals Decision regarding rural lands - (This information to be placed in public record)

Dear Commissioners,

It is clear to Clark County Citizens United, Inc. that county planning staff is delaying any meaningful interpretation of the public process and testimony regarding the rural lands in the 2016 update of the Comprehensive Plan. When presenting the results of a scoping for the SEIS, staff only referenced limited comments submitted into the record from the public, which came from four poorly attended meetings. These meetings were located in the urban areas of the county, and did not include rural areas. The scoping references did not include ongoing testimony from CCCU, which represents approximately 8000 rural and resource landowners, from 1994 to today. Did the county planning staff consider the past public record of hundreds of landowners begging the commissioners to not place their 2.5 and 5 acre parcels into 10, 20, 40 and 80 acre zones. Staff is also ignoring the fact that approximately 80%, or more, of the rural and resource lands have been zoned into a non-conforming and substandard lot size, in the old 1994 GMA Comp Plan. Work sessions are now being scheduled by staff, to review the supposed three alternatives for the SEIS, when there has been no meaningful opportunity for rural landowners to weigh in on the update process. CCCU does not believe that four open houses, poorly advertised and attended, and online discussions, constitutes a meaningful public process required under the GMA, for such a weighty and important subject, having such a massive financial and economic impact to rural and resource landowners.

On one hand county staff reports claim that more rural land needs to be preserved for agricultural uses and on the other hand, staff tells CCCU that rural lands are not going to be considered in the 2016 update. CCCU was told the same thing in the 2004 update and the 2007 update, when testimony was submitted regarding asking for a review of the rural and resource land designations and zoning. CCCU was told that those areas will be reviewed later, which never happened. CCCU, Inc. does not agree that the GMA intended that the rural lands must remain static and in the same zoning given it in 1994 and then be ignored year after year after year, at each update. In addition, the GMA Plan is generally considered a twenty year plan, which indicates that both urban and rural areas should now be evaluated and considered for change. In light of the massive downzoning of small rural and resource parcels to large and very large resource and rural parcels, all of the record indicates that incorrect and misguided designations could have occurred in 1994 and that a correction and reconsideration of those areas is now in order. Clark County Citizens United, Inc. is asking the Clark County Board of Commissioners to make those appropriate changes in a fair and balanced process and in a proper and timely fashion.

Sincerely,

Carol Levanen, Ex. Secretary
Clark County Citizens United, Inc.
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