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CP16#0488

CC'd - Board
Orjako
O'Donnell
Silliman
December, 2, 2014

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

Re: 2016 Comprehensive Land Use Plan - Alternatives - Maps

Since January 2014, and in prior year updates to the Clark County Comprehensive Plan, Clark County Citizens United, Inc. has submitted testimony regarding concerns, the process, compliance and zoning of the Comprehensive Plan in Rural and Resource areas. From 1994 to 1999, CCCU, Inc. represented it's members in the courts, over these lands, and prevailed in each of the five court actions. These courts ordered the Western Washington Growth Management Hearings Board to assure Clark County complied with those court mandates relating to the GMA and SEPA. The WWGMHB and Clark County have yet to comply with the court directives, which has led to an ongoing faulty Comprehensive Plan. We ask the commissioners to make the necessary and mandated corrections to the Plan, as described in the those court orders.

Clark County failed SEPA compliance in 1994, with an EIS that did not reflect changes and alternatives that addressed the massive down zoning. CCCU, Inc. ask the commissioners to make corrections in the 2016 Comprehensive Plan update, using three alternatives for rural and resource areas, in addition to the two specific to the cities. After twenty years, doing nothing should not be an option, as many changes have occurred in those areas since 1994. Based on public testimony, CCCU, Inc. has submitted two Alternatives, in a public forum, that meet the requirements of the court actions and the directives of the GMA. We ask that these be part of the DSEIS and SEIS in the 2016 update, for full consideration by the commissioners and the public.

Clark County had a Comprehensive Land Use Plan prior to 1994 and the GMA. It designated appropriate rural and resource zoning with ordinance consistency. That Plan already prevented urban sprawl, whatever it's definition, in the rural and resource areas. But, in order to disregard the existing rural and resource development, new maps were created, to justify the massive down zoning, using an unauthorized criteria and formula for rural and resource designations. These 1994 resource and rural maps did not receive the scrutiny the GMA requires. CCCU, Inc. ask the commissioners to correct the resource maps to reflect true and accurate resource lands while recognizing the existing 1994 development and complying with GMA mandates in those areas.

It is unfortunate the WWBMHG did not honor court rulings when it allowed Clark County to avoid due diligence in compliance to the orders. The commissioners now have an opportunity to correct the record in the rural and resource zones. The 1994 Plan failed to recognize the unique rural character that was already established in the patterns of development and parcelization. The economy in these areas has suffered severely from the misguided misunderstandings of the past. We ask the commissions to make changes to the Plan and return the historic rural character that defines rural and resource lands in Clark County.

Respectfully submitted by, *Carol Levanen*

Carol Levanen, Ex. Secretary, for and in behalf of the members
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