

**Schroader, Kathy**

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**From:** Tilton, Rebecca  
**Sent:** Thursday, September 03, 2015 9:08 AM  
**To:** Madore, David; Stewart, Jeanne; Mielke, Tom; Silliman, Peter; Orjiako, Oliver; Schroader, Kathy  
**Subject:** Comments RE: Comp Plan Update (9/1/15 BOCC Hearing)  
**Attachments:** Carol Levanen comments\_09-01-15.pdf; Susan Rasmussen\_09-01-15.pdf

The attached written testimony was received from Carol Levanen and Susan Rasmussen during the public comment portion of the 9/01/15 BOCC hearing.

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](mailto:Rebecca.Tilton@clark.wa.gov)



~~CONF~~ Rec'd 9/1/15  
CC'd = BOCC; Orjiako; Schroeder  
Silliman

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

September 1, 2015

For the Public Record

Dear Councilors,

In the Growth Manage Act, 2016 Comprehensive Plan Draft SEIS, one is lead to believe the Framework Plan was a new concept adopted in 1993 to guide the 1994 Comprehensive Plan. An examination of the text and history of the Framework Plan shows the intent and purpose of this document. Staff is improperly applying the Framework Plan in the 2016 update. Originally, the concept was used in 1977 to determine and segregate rural, urban and resource lands. It was simply used as an organizational tool with goals and objectives for the future. In 1993 it was presented to citizens as a public outreach mechanism, leading people to believe they had a say in the planning process. In reality, the 1979 Framework Plan was simply expanded, but very little was changed conceptually. It continued to be a document that was used to segregate rural, urban and resource lands. But, in 1994, it was touted as the reason for massive down zoning of thousands of rural and resource lands into very large lots, and reflected as the peoples choice. Hundreds came forward to protest the Plan, but their pleas were ignored. Is this Council going to ignore the public testimony of those rural landowners, and allow this to happen again in the 2016 update?

The 6-24-77 2nd Draft - CRITERIA FOR CHANGING URBAN RURAL AND NATURAL RESOURCE CAEGORIES, states, " *Within the Framework Plan of the proposed new Clark County Comprehensive Plan, three broad land use categories have been proposed; urban, rural and natural resource.*

Page 8,9 discusses resource and rural lands. ...*The existence of prime or good agricultural soils or site index 2 Forest Lands be noted as soon as possible .... 2. That not more than 50 percent of the land is broken up into parcels of less than ten acres.* The companion document called CLARK COUNTY COMPREHENSIVE PLAN DISCUSSION DRAFT GOALS AND GUIDELINES page 1, item 2 states, *Rural Lands - Those lands not within urban service guideline areas 1 and 2 that are suitable for settlement. Small farms and acreage home sites are the predominant land use.*

Page 5, RURAL LANDS - Goals; 1, it states ...*rural areas for the maintenance of diverse life style opportunities for present and future generations. 2. To encourage the maintenance of small farms or acreage home sites on land suitable for sparse settlement.*

Page 7-8, CONSERVATION GOALS 1. *To encourage the maintenance of agricultural land uses in those areas that are agriculturally productive. 2. To encourage the conservation of land best suited for the production of food and fiber products. Guidelines: 4. b. and c., Conserve prime timberland ...defined by the United States Department of Agriculture - site index 2 or Conserve prime agricultural land soils classified by the soil Survey of Clark County, USDA Conservation Service 1972 currently in production...* Item 13. states, *Identify commercial forest land suitability by evaluation soil productivity land ownership patterns and existing use.*

Page 12, HOUSING GOALS AND OBJECTIVES - *Statement of Intent - The production and rehabilitation of housing reflect the social and economic well-being of a community. It is the responsibility of the community to strive for the highest quality of living environments for all citizens, while enabling each citizen to choose a home among a variety of housing types and residential areas.*

Page 21-22 GOALS AND GUIDELINES FOR ECONOMIC ELEMENT - *Statement of Intent - The promotion of an area wide economic environment which is conducive to the well being of the region and based on the private ownership of property and the freedom of the individual to engage in*

**economic activities of his choice for his own profit and well being. 3. An annual review and evaluation of overall economic growth would be prepared.**

Page 26 - **DEFINITIONS - PRIME AGRICULTURE LAND - Soil Conservation Service Capability Classes I and II.**

The 1979 CLARK COUNTY COMPREHENSIVE PLAN GOALS AND GUIDELINES - INTRODUCTIONS - states **These Goals and Guidelines and attached Broad Land use Map (which together constitute the Framework Plan) are intended to establish a benchmark along the route toward the adoption of a more detailed Comprehensive Land use Plan. The Framework Plan is not intended to constitute the Comprehensive Plan of Clark County, except for the purpose of designating the boundary lines between urban, rural and natural resource areas. This, for the purpose of establishing these boundary lines the Broad Land Use Map and the planning data upon which it is based shall take effect immediately upon the adoption of the Framework Plan. It is not intended in so adopting this Framework Plan to repeal, either expressly or impliedly, and portion of the Clark County Comprehensive Plan adopted on February 23, 1960.**

Page 16, **ECONOMIC ELEMENT - GUIDELINES; 2.** it states, **Encourage a diversified economy with employment opportunities which complements the characteristics of the Clark County labor force.**

Page 20 **DEFINITIONS - PRIME AGRICULTURAL LAND - Soil Conservation Service Capability Classes I and II.**

In the May 26, 1993 Community Framework Plan, Clark County, Washington, on page 8 it reads, **ISSUES ADDRESSED BY THE COMMUNITY FRAMEWORK CONCEPTS - This is the beginning. The Draft Community Framework Plan does not change the existing comprehensive plan or zoning of Clark County. However, the Draft Community Framework Plan does provide the framework with which the County, cities, and towns have the flexibility to develop their own growth policies and plans for their individual 20-year Growth Management Comprehensive Plans.** It goes on to say, **Outside the urban areas, the land is predominantly rural with farms, forests open space, and large lot residences. Shopping or businesses would be in rural centers. Urban level of public services would generally not be provided in rural areas. Rural residents are provided levels of service appropriate to their areas. These areas are by definition more rural in nature and residents are more self-sufficient, often relying on private wells and septic systems. Most of northern Clark County would remain as it is today, in resource industries or rural use.** One might understand this sentence to mean that no change would occur with rural and resource land. But, little did folks know that only the names stayed the same, and the legal lots and conforming lots changed dramatically.

On page 16,17, The 1993 Framework Plan determined there would be Villages and Hamlets, as well as Rural Centers. But those concepts, were thrown out. It took a court action to return the rural centers, but only a few locations were allowed, compared to what citizens wanted and thought was going to happen.

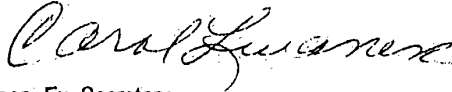
On Page 19, 20 - 2.0, and 2.2.0 the Housing section in the 1993 Framework Plan states, **The Housing Element is to recognize the vitality and character of established residential neighborhoods and identify sufficient land for housing to accommodate a range of housing types ...** In 2.2.0 - **Framework Plan Policies** - it states, **Communities, urban and rural, should contain a diversity of housing types to enable citizens from a wide range of economic levels and age groups to live within its boundaries and to ensure an adequate supply of affordable and attainable housing. Little did the people know that only the urban area was to be included and high density was the goal.**

Page 3 of 3

On page 24 of the Framework Plan it states in 4.1 County-wide Planning Policies a. it states, ***The County shall recognize existing development and provide lands which allow rural development in areas which are developed or committed to development of a rural character.*** On page 25, 4.2.6 it states, ***All new development should be of a scale consistent with the existing rural character.***

So one can see that the Framework Plan intended to be fair and equitable as Clark County planned for the future. It included something beneficial for all of the citizens of the county. The 2016 Plan is claimed to reflect the Community Framework Plan, but that simply is not the truth. Corrections to the Comprehensive Plan are needed to accurately reflect what was intended to happen in the lives of those who live in Clark County and in the real Clark County Community Framework Plan.

Sincerely,



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

CLARK COUNTY FRAMEWORK PLAN

DRAFT ENVIRONMENTAL IMPACT STATEMENT

June 1977

Prepared for the Clark County Planning Commission and Board of County Commissioners by the staff of the Regional Planning Council of Clark County, pursuant to the requirements of the State Environmental Policy Act (RCW 43.21C) and the SEPA Guidelines (WAC 197-10).

CRITERIA FOR CHANGING URBAN, RURAL AND  
NATURAL RESOURCE CATEGORIES

Need for Change

Within the Framework Plan of the proposed new Clark County Comprehensive Plan, three broad land use categories have been proposed: urban, rural, and natural resource. As time progresses, changes in designations may be necessary to provide for flexibility within the plan. For instance, a need for more urban land may become evident, and a means of providing more land so designated may be necessary.

Types of Change

Because there are three broad land use categories, it is possible to formulate six different changes (some may not be very probable but all possibilities should be taken into consideration:

Natural Resource to Urban

Rural to Urban

Natural Resource to Rural

Rural to Natural Resource

Urban to Rural and

Urban to Natural Resource

These possible conversions can be broken down into two major types: those that increase the intensity of use, and those that reduce the intensity of use. A change from natural resource to rural or urban, or from rural to urban, would be

CLARK COUNTY COMPREHENSIVE PLAN  
GOALS AND GUIDELINES

INTRODUCTION

The Comprehensive Land Use Plan shall serve a variety of functions for the citizens of Clark County. Perhaps the most fundamental purpose, and the one specifically mentioned in the Washington State Planning Act (RCW 35.63), is to guide the physical development of the County. The enabling act has as its purpose the certification of both public and private projects and the coordination of their execution in developing and servicing land. The intent is to assure the "highest degree of public health, safety, morals and welfare" for the citizens of the State of Washington.

The citizens of Clark County have reached general conclusions about the future of Clark County. Through a citizen involvement program, conducted by the County Planning Commission and staff, it was established that future population growth and subsequent land development shall be encouraged to locate within or adjacent to existing cities and towns. Termed the "cluster concept", this future urban form should maximize the efficiency of the provision of public services and facilities while assuring the private ownership of land and the freedom of the individual to engage in economic activities of his choice for his own profit and well-being.

These Goals and Guidelines and attached Broad Land Use Map (which together constitute the Framework Plan) are intended to establish a benchmark along the route toward the adoption of a more detailed Comprehensive Land Use Plan. The Framework Plan is not intended to constitute the Comprehensive Plan of Clark County, except for the purpose of designating the boundary lines between urban, rural, and natural resource areas. Thus, for the purpose of establishing these boundary lines, the Broad Land Use Map and the planning data upon which it is based shall take effect immediately upon the adoption of the Framework Plan. However, the effective date of the Goals and Guidelines of the Framework Plan shall be delayed until the adoption of the more detailed plan.

It is not intended in so adopting this Framework Plan to repeal, either expressly or impliedly, any portion of the Clark County Comprehensive Plan adopted on February 23, 1960, or any valid amendment, extension or addition thereto.

THE LAND

The Comprehensive Plan Discussion Draft divides Clark County into three broad land use classifications:

AGRICULTURAL SOIL SUITABILITY RATINGS IN CLARK COUNTY

Agricultural soil suitability ratings were developed by the U.S.D.A. Soil Conservation Service in Clark County. The ratings are based on localized soil conditions and their agricultural productivity. Agricultural lands with soil suitability ratings of prime and good are proposed for conservation under the Framework Plan. Following is the suitability rating by soil type (including slope), with a brief description of each.

<u>Rating</u>	<u>Soil Series (Mapping Unit)</u>	<u>Description</u>
Prime	Hillsboro loam, 0-3 (HIA) Hillsboro silt loam, 0-3 (HOA) Hillsboro loam, 3-8 (HLB) (HOB)	These soils are the most prime in the county. They have the best soil structure, best climate, wide range of work-ability, least energy inputs, are very fertile and all crops adapted to the area can be grown.
Prime	Newberg silt loam, 0-3 (NbA) Newberg silt loam, 3-8 (NbB) Cloquato silt loam, 0-3 (CtA) Sauvie silt loam, 0-3 (SmA) Sauvie silt loam, 3-8 (SmB) substratum, 0-3 (SnA) Sauvie Silty clay loam, 0-8 (SpB)	These soils are prime where they are behind dikes. They are fertile, have good soil structure, are fairly easily worked, and a wide range of crops can be grown.
Prime	Semiahmoo muck (Sr) Semiahmoo muck, shallow variant (Su) Tisch silt loam, 0-3 (ThA)	These soils are prime or unique for specialty crops, where drained.
Good	Sauvie silt loam, 0-3 (SmA) Sauvie silt loam, 3-8 (SmB) Sauvie silt loam, sandy substratum, 0-3 (SnA) Sauvie silty clay loam, 0-8 (SpB) Newberg silt loam, 0-3 (NbA) Newberg silt loam, 3-8 (NbB) Cloquato silt loam, 0-3 (CtA)	These are the same soils as in Group 2, but are subject to periodical flooding. If diked they would be prime.



Gee silt loam, 0-8 (GeB)	These are good, fertile soils, easily worked, but have a restrictive layer which limits some deep-rooted crops. Internal drainage is generally required for maximum use.
Hesson clay loam, 0-8 (Dobler) (HcB)	This soil, originally mapped Dobler, was lumped into the Hesson series. It is much better for agricultural uses than the Hessons. It has less clay content and is more easily worked.
Hillsboro loam, 8-15 (H1C) Hillsboro silt loam, 8-15 (HoC) Hillsboro silt loam, 15-20 (HoD)	These are the same soils as in Group 1, but repose on steeper slopes, causing increased erosion hazards and equipment limitations.
Puyallup fine sandy loam, 0-3 (PuA) Wind River sandy loam, 0-8 (WnB) Wind River sandy loam, 8-20 (WnD) Wind River gravelly loam, 0-8 (WrB)	These soils have good workability but some are subject to flooding on lower elevations where not diked. They are also drouthy and require irrigation for maximum crop yields.
Cinebar silt loam, 3-8 (CnB) Cinebar silt loam 8-20 (CnD)	Very deep soils with good workability, but they occur at higher elevations and climatic conditions become a limiting factor.
Fair Hesson clay loam, 0-8 (HcB) Olympic clay loam, 3-8 (OlB)	These soils, being higher in clay content, require increased energy inputs. Basic soil fertility is low. Cultivation is restricted because of the clay content and the narrow range of moisture needed for good tillability.
Powelll silt loam, 8-20 (PoD) Sara silt loam, 8-20 (SlD) Olympic clay loam, 8-20 (OlD) Hesson clay loam, 8-20 (HcD) Gee silt loam, 8-20 (GeD)	These soils have restrictive layers and/or higher clay content, steeper slopes, and poor workability.
Dollar loam, 0-5 (DoB) Sara silt loam, 0-8 (SlB) Hockinson loam, moderately well drained, 0-8 (HuB)	These soils have poor internal drainage and low fertility.
Lauren gravelly loam, 0-8 (LgB) Vader silt loam, 3-8 (VaC) Lauren loam, 0-8 (LeB)	These soils range from a silty loam to gravelly loam which is drouthy with low fertility.

Fair

Cove silty clay loam, thin  
solum,, 0-3 (CwA)  
Cove silty clay loam, 0-3 (CvA)  
Hockinson loam, 0-3 (HtA)  
Hockinson-Dollar loam, 0-3 (HvA)  
McBee silt loam, 0-5 (McB)  
McBee silty clay loam, 0-3 (MeA)  
McBee silt loam, coarse variant  
0-3 (MlA)  
Odne silt loam, 0-5 (OdB)  
Olequa silt loam, 3-20 (OeD)  
Salkum silty clay loam, 3-15 (SaC)  
Washougal loam, 0-3 (WaA)  
Washougal gravelly loam, 0-8 (WgB)

Not color coded.  
Soils too poor for  
agricultural production.

**PRELIMINARY DRAFT**

**ENVIRONMENTAL IMPACT STATEMENT**

**COMMUNITY FRAMEWORK PLANS**  
**CLARK COUNTY, WASHINGTON**

November 6, 1992

*Prepared for*

Clark County Public Services  
Department of Community Development  
1408 Esther Street  
Vancouver, Washington 98668  
(206) 699-2375

*Prepared by*

David Evans and Associates, Inc.  
2828 SW Corbett Avenue  
Portland, Oregon 97201  
(503) 223-6663



DEPARTMENT OF  
PUBLIC SERVICES

Planning & Development Review Division

November 6, 1992

To Whom It May Concern:

Clark County is preparing a new comprehensive plan in accordance with the Washington State Growth Management Act (GMA) of 1990 as amended (ESHB 2929 and 1025). The plan will consist of elements addressing land use, transportation, utilities, capital facilities, housing, parks and open space, rural areas, economic development, critical areas and resource lands, and possibly other optional elements. The County and cities within it have been working on this process since 1990.

The GMA requires the County and each city and town to plan to accommodate twenty years of projected growth. However, County officials recognize that the County will not stop growing then. In order to provide supporting urban services (water, sewer, roads, and storm drainage) in an efficient and cost-effective manner, it is necessary to plan for a longer time frame. Therefore, the County proposes to adopt a Community Framework Plan to guide development for the longer term.

SEPA requires that agencies evaluate the environmental impacts which may result from decisions to pursue particular courses of action. SEPA encourages agencies to begin environmental review at the earliest possible time in the planning and decision-making process when the principal features of the proposal and its associated impacts can be reasonably identified (WAC 197-11-055-(2)). Proposed actions such as adoption of plans and policies are known as non-project or programmatic actions. These actions are broader than those necessary for site-specific projects. Their analysis is also broader and is framed as a discussion of the alternative courses of action which can accomplish a stated objective. SEPA states that an EIS discussion of alternatives for a comprehensive plan, such as this, shall be limited to a general discussion of the impacts of alternative policies. The lead agency is not required to examine all conceivable policies, designations, or implementation measures but should cover a range of topics (WAC 197-11-442). Subsequent actions resulting from adoption of the Framework Plan may be either non-project or project actions requiring further environmental review as determined by threshold evaluations.

In this non-project analysis, Clark County is evaluating the environmental impacts of several alternative concepts for accommodating growth throughout the County. The alternatives include the existing Comprehensive Plan (the "no action" alternative); and three different visionary concepts for the future. Each of the alternatives would accommodate growth beyond that forecast for the next 20 years, but each represents a different urban form. Each would have a different potential positive and adverse impacts on the environment. Growth by itself has impacts on infrastructure, public services, aesthetics, and the natural environment.

1408 FRANKLIN STREET • P.O. BOX 9810 • VANCOUVER, WASHINGTON 98668-9810

FAX (206) 699-2011 • (206) 699-2375



017760