

Schroader, Kathy



From: Orjiako, Oliver
Sent: Friday, October 23, 2015 2:47 PM
To: Euler, Gordon, Alvarez, Jose; Anderson, Colete; Albrecht, Gary, Hermen, Matt, Kamp, Jacqueline, Lebowsky, Laurie, Lumbantobing, Sharon
Cc: Schroader, Kathy
Subject: FW: Essential to get it right

FYI and for the record Thanks

From: susan rasmussen [<mailto:sprazz@outlook.com>]
Sent: Friday, October 23, 2015 1:41 PM
To: Mielke, Tom; Stewart, Jeanne; Madore, David; McCauley, Mark; Orjiako, Oliver
Subject: Fw: Essential to get it right

Sent from Windows Mail

From: susan_rasmussen
Sent: Friday, October 23, 2015

For the public record, and the 2016 Comprehensive Land Use Update

Rural communities are on high alert for unreliable facts that impact the future designs of their lands, in the 2016 update of the Comprehensive Land Use Plan. It would appear that perpetuating more of the same old methodology used in the past is not only wrong ... it is unlawful. CCCU's Superior Court Orders said, "*The Board's (Hearings Board), decision to uphold the adequacy absent additional environmental analysis regarding designations and changes to the pattern of rural development was clearly erroneous. The county's rural and resource lands regulations are inconsistent with the Growth Management Act*" April 4, 1997, Superior Court, Judge Edwin J Poyfair, Pg 6, Decision 96-2-00080-2.

Recently, CCCU had the opportunity to talk to the Judge about the 1994 comprehensive plan and our resulting court case. The conclusion was that the county's plan was flawed because the method used to craft the foundation of the comprehensive plan was wrong. The county invented the desired outcome first, then manipulated the factors in such a way to subordinate the designed outcome. This created a completely senseless plan that altered the course of the county's unique rural character for 20 years.

Some of the factors used in the flawed design:

- Clark County metadata and landowner testimony confirms the inappropriate use of aerial photography to designate resource lands. State law mandates use of the NRCS soil manual.
- Using low population figures inconsistent with actual data

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- Using large lot zoning to further prevent land divisions
 - Using urban holding and urban reserve overlays unlawfully for 20 years
 - Not using realistic urban/rural ratios that are consistent with historical trends
 - Inflating the rural lot numbers by not eliminating the cluster remainder lots, critical lands, wetland, and the 15% non-buildable land for infrastructure (roads, parks, etc. as applied to urban area)

 - Preventing collaboration, by not recognizing the rural communities as stakeholders, fails to advance a good public process element mandated under state law
 - This method results in the future of rural and resource communities being designed by the cities
 - The result is an unbalanced plan

The planners of the Puget Sound Regional Council scrub every piece of data that crosses their desks. This practice is part of their standard research protocol. It is time for serious reform in Clark County to prevent the kind of unrealistic data that has been woven into this comprehensive plan update. Access to good data is the most important tool in the tool box. This is essential to do good work that can withstand scrutiny from the hearings board or the courts. The important research presented by Councilor Madore at the Oct 20, 2015 hearing, stands in stark contrast with the data in the draft SEIS and demonstrates many inaccuracies. Accurate research data influences the BOCC policies, and is essential to a reliable SEIS. This research work had to be done.

Susan Rasmussen for
Clark County Citizens United, Inc.

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