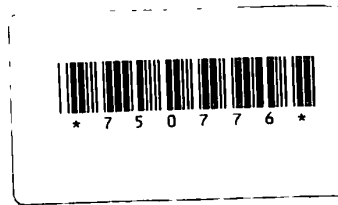


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Clark County Planning Commission
c/o Steve Morasch
Clark County Community Planning
1300 Franklin Street
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Dear Planning Commissioners:

I am submitting this testimony for both myself a resident of Clark County and on behalf of Friends of Clark County to include, in the record, my concerns with the process by which Mr. Madore's ~~the~~ assumptions from Table 1: Rural VBLM assumptions and Table 2: Planning Assumptions were developed and have been applied to the Comp Plan alternatives, particularly Alternative 4. Over the past month, I have listened to Mr. Madore present his assumption changes four times, and I have become increasingly concerned that these changes, as pushed forward at the Work Session on Nov. 9th, are not based on a methodology that has been historically used or on any identified or accepted planning standard of practice.

I have a background in statistical analysis, data modeling, database practices, and conflict management. I hold a Ph.D. in Computer Information Systems and have conducted research in both data integrity for data/knowledge based systems and strategic alignment of systems in organizations. Although I no longer teach at the university level, I still conduct research for various purposes/projects, including my own research of this Comp Plan analysis.

At the Nov. 9th Work Session, Mr. Madore introduced his proposed planning assumption changes as evidence based and stated that the "assumptions establish the facts." This perspective is a very interesting from a data model and integrity standpoint which would expect that only the data should establish the facts. Instead, assumptions should do nothing more than limit the scope of a model, which is exactly what Mr. Madore has done - limit the scope of the VBLM as applied on rural parcel data which results in the perception of fewer potential home sites than his previous Alternative 4.

While the facts on these reductions have not been shown, you should have GIS information tonight that highlights how the specific assumptions impacted the potential home sites so that you can see how the application of his specific rules/assumptions changed the outcome. You also should have planning and legal departments comments on the challenges and problems with Mr. Madore's "assumptions" that show their validity is both questionable and unclear. As stated Mr. Madore remarks his approach is "evidence based," which implies the use of the best available evidence. I ask this commission and the community of Clark County, how can the "assumptions" he is applying be considered "evidence based" when qualified planners, legal staff, a number of members of the community question the very validity of which they are based?

Because I have heard Mr. Madore say on multiple occasions, "garbage in . . . garbage out," I became more interested in the source of these changes. Though the listening to Mr. Madore's presentations, speaking directly with him, and spending about 45 minutes with GIS staff in their office, and reviewing the document provided to you, I came to understand the source of these changes more clearly.

Sometime between September 17th and October 20th, Mr. Madore began "what if" analysis on an exported copy of the parcel data. He was then able to merge his data changes with GIS data, and ran their Vacant Buildable Land Model to see the result of how it changed the number of potentially buildable lots in the rural areas. Attached is a list of the database fields, descriptions and other information that shows what Mr. Madore used for his queries and selection process to exclude parcels.

His "what-if" analysis approach and the resulting conclusions were driven by own perceived values of what Alternative 4 should be and the goal to modify the Rural VBLM. The result of this analysis was his list of "revised assumptions" that both he and I agree are really policy for determining what is or is not a buildable parcel. Furthermore I learned from GIS staff that this is the first time exclusions have been applied to the rural area since planning under UGA started in 1994. Historically, the process has been that community planning directs the criteria for the model.

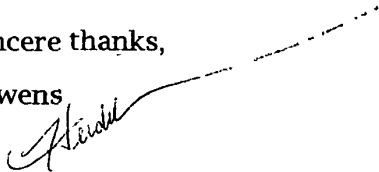
At issue is what is or should be best practice for Clark County with respect to the use of rules/policies to set criteria for both rural and urban lands. As Mr. Madore has said, the output depends on the input and "garbage in . . . garbage out." If the specific assumption from Mr. Madore's B list has a fault, than it will propagate through the model and affect the outcome. For example, constrained lands are "way overstated" in the data parcel overlays according to GIS staff and that overlay data does not provide good detail. Without actually reviewing every constrained parcel, it impossible to determine if it will develop or not - and many if not most do with proper mitigation. The fact that all constrained lands are excluded in the revised alternative means the potential home sites are understated.

In summary, standard practice for aligning modeling systems with organizational vision or goals would dictate that agreed upon goals drive policy, rather than having a bottom up "value based" approach drive policy. The approach and resulting assumptions pushed forward by Mr. Madore and Mr. Mielke are in direct violation to RCW 36.70A.011 because they are not vision based or provide the means for ensuring rural character.

I ask the commissioners to resubmit their previous recommendation from September 17th to the BOCC for consideration and not address any plan under Mr. Madore's revised assumptions.

With sincere thanks,

Heidi Owens



FieldName	Description	Information Source	Applied Assumptions
PropertyID	Assessor Property Account number	GIS Parcel Layer	
ResClass	RuralVBLM Residential Classification	Calculated	See ResClass tab
ComClass	RuralVBLM Commercial Classification	Calculated	See ComClass tab
IndClass	RuralVBLM Industrial Classification	Calculated	See IndClass tab
VBLMCode	A grouped model classification code for all land use	Calculated	See VBLMCode tab
LandUse	group zoning codes into general landuse	Input RuralLanduse Layer	
LandUseDesc	description of LandUse field	Input RuralLanduse Layer	
VBLMZoning	Zoning Classification Code for Model Run This is combined proposed and current zoning	Input RuralLanduse Layer	
VBLMZoningAbbrev	Abbreviated Description of VBLM Zoning Code	Input RuralLanduse Layer	
Zoning	Current Zoning Classification Code	Input RuralLanduse Layer	
ZoningAbbrev	Current Zoning abbreviated description from the input landuse layer	Input RuralLanduse Layer	
MinLotSize	Minimum Residential lot size for the zoning / land use classification	Input RuralLanduse Layer	
VBLMLandUse	RuralVBLM Property Land Use classification	Input RuralLanduse Layer	res, com, or ind
PropertyClass	RuralVBLM classification of properties for mostly used for exclusions	Calculated	See PropertyClass
GISAc	Acreage of GIS delineation of the property	Assessor Summary Table	
VBLMNetAcres	Developable acreage of property (w/constrained land removed).	Calculated	Query = GISAc - CriticalAcres
VBLMHousingUnits	Rural VBLM additional housing unit capacity. Number of new housing units	HousingUnits field	Query - Resclass in (2,3,4) and Calc from HousingUnits
VBLMPeople	Rural VBLM additional population capacity Number of new people	People field	Query - Resclass in (2,3,4) and Calc from People
VBLMJobs	Rural VBLM additional Jobs Number of new jobs	Jobs field	Query - ComClass and IndClass in (2,3) then calc from Jobs
HousingUnits	Additional housing unit potential for the parcel	Calculated	GISAc / MinLotSize or 1 housing unit for undersized lots >= 1
People	Additional People potential for the parcel	Calculated	unconstrained acre Housing units x 2.66 persons at parcel level
Jobs	Additional Job potential for the parcel	Calculated	Commercial = 20 jobs per acre Industrial = 1 job per acre
MktBldgVal	Market building value Sum of all building values on the property	Assessor Summary Table	
AssrAc	Assessors acreage for the property	AssessorSummary Table	
Units	GIS Housing Units from Assessor Summary Table	AssessorSummary Table	
PT1	Assessor Primary Property Type	AssessorSummary Table	
PT1Desc	Assessor Primary Property Type Descriptions	AssessorSummary Table	
TxStat	Property Tax Status	AssessorSummary Table	Query exempt properties
Critical	Identifies if constrained land exists on property	Critical Layer	1=constraints, 0=no constraints
CriticalAcres	Acres of constrained land	Critical Layer	
EXCLUDE	Site Specific Determination that the property should be excluded from potential housing unit inventory	See SiteSpecificExclude for list of properties excluded	yes/no
SHAPE_Area	Size of parcel in GIS square feet Required field for GIS, not used in this model	GIS Parcel Layer	
SHAPE_Length	Length of property lines around a parcel (Required field for GIS, not used in this model)	GIS Parcel Layer	