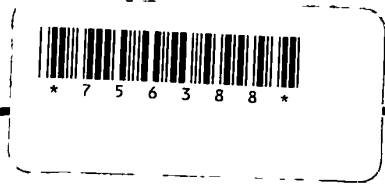


**Schroader, Kathy**



**From:** Orjiako, Oliver  
**Sent:** Tuesday, January 19, 2016 8:39 AM  
**To:** 'Carol Levanen', Stewart, Jeanne, Olson, Julie (Councilor), Mielke, Tom, Madore, David, Boldt, Marc  
**Cc:** Schroader, Kathy  
**Subject:** RE: Level of sophistication lacking in the Draft SEIS by staff - For the Public Record and the 2016 Comprehensive Plan update

Good morning Carol

Staff do not typically respond to request to add comments into the record. We will index your comment as we have throughout the comp plan update. I must however, we must continue to state the fact and that is when a property developed under the cluster provision is brought into the urban growth area the remainder parcels do develop at whatever density it is zoned or planned for.

Secondly, there is no good data on number of resource (Agriculture and Forest cluster remainder lots) because some occurred in the 1980's. So, the 40-50 remainder lots I mentioned may be right or off. Finally, staff will remain professional as we have throughout the comp plan update. Thank you.

Best,

Oliver

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**From:** Carol Levanen [<mailto:cnldental@yahoo.com>]  
**Sent:** Sunday, January 17, 2016 10:18 PM  
**To:** Stewart, Jeanne; Olson, Julie (Assessment); Mielke, Tom; Madore, David; Boldt, Marc; Orjiako, Oliver  
**Subject:** Fw: Level of sophistication lacking in the Draft SEIS by staff - For the Public Record and the 2016 Comprehensive Plan update.

----- Forwarded Message -----

**From:** susan rasmussen <[sprazz@outlook.com](mailto:sprazz@outlook.com)>  
**To:** Carol Levanen <[cnldental@yahoo.com](mailto:cnldental@yahoo.com)>  
**Sent:** Sunday, January 17, 2016 6:32 PM  
**Subject:** Fw: Level of sophistication lacking

Sent from Windows Mail

**From:** [susan rasmussen](mailto:susan.rasmussen@outlook.com)  
**Sent:** Sunday, January 17, 2016 6:27 PM  
**To:** [sprazz@outlook.com](mailto:sprazz@outlook.com)

The validation of Assumption 1 critically impacts the rural and resource census of lots. In a November 2015 work session before the Planning Commission, Oliver Orjiako publicly justified counting the large remainder lot parcels as buildable because, "they are fully developable parcels when they go into city limits."

Therefore, it stands to reason that urban density standards were applied to these parcels in the methodology used to count the developable lots contained within each large remainder parcels. Oliver was asked at the January 13th work session to provide an approximate number of remainder lots. He replied, "40-50 lots "

His answer is very misleading. It may be true there are 40-50 large remainder parcels. However, he failed to provide the estimated number of potentially developable lots contained within each large remainder parcel. **That is the figure that needs to be scrupulously examined as that number is derived from the applied methodology reflected in the graph, Page 1-3 of the Draft SEIS.**

The calculations shown in the graph, **Page 1-3 of the Draft SEIS**, reflect a flawed methodology and its application greatly exaggerates the census of developable rural and resource parcels  
Please see Page 23 of the Thorpe Report, Critique of Planning Assumptions, Finding:  
**"Based on these projections, all four alternatives, detailed on Page 1-3 of the Draft Supplemental EIS, which were considered exceed the number of units needed to accommodate the growth."**

Please see Page 3, Thorpe Critique of Planning Assumptions, Assumption 1:  
"R W Thorpe & Associates, Inc. Finding - **VALID: State WAC's. RCW's and GMA deem remainder parcels as permanently protected undevelopable areas save for a few exceptions so these areas should not be counted as likely to develop.**"

**"EFFECT: The validation of this assumption removes these parcels of land from the rural available inventory for future development."**

**Was Thorpe unaware of the applied flawed methodology reflected in the figures, Page 1-3 of the Draft SEIS? Their own Report refutes the methodology on Page 3: Are county planners not aware of proper protocols to arrive at true estimates? This leads me to believe the report's level of sophistication is far shy of professional standards, or the data Thorpe was given was riddled with errors and incomplete.**

In a breathtaking maneuver last Wednesday afternoon, January 13, Oliver Orjiako declared the preferred alternative plan, "invalid " He was assuming much and Mark McCauley failed to curtail Oliver's display of bias. Actually, his brazen move is indicative of the planning staff's true colors Mr Orjiako's inappropriate declaration is a symptom of something much larger...the anti-growth attitudes of the staff. That die was cast over 20 years ago and continues to influence policy-making, depressing wages, and economic opportunities in the rural area.

Thank you for your considerations,  
Susan Rasmussen for  
Clark County Citizens United, Inc