

Schroader, Kathy



From: Orjiako, Oliver
Sent: Wednesday, January 20, 2016 8 32 AM
To: 'Carol Levanen'
Cc: Schroader, Kathy, Euler, Gordon, Alvarez, Jose
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

Thank you for your email reply and the issues raised. I can assure you that Staff is diligently working with the county GIS staff to identify the cluster remainder lots post and pre 1994 land use plan.

Community Planning staff (Jose Alvarez) is working with GIS staff on this issue. The review will lead to an estimate of what the actual potential number of lots are so that can be accounted for. I continue to stress the fact that throughout the comp plan update staff has remained professional and will continue to do so.

From: Carol Levanen [mailto:cnldental@yahoo.com]
Sent: Wednesday, January 20, 2016 2:56 AM
To: Orjiako, Oliver
Subject: Fw: Level of sophistication lacking in the Draft SEIS by staff - For the Public Record and the 2016 Comprehensive Plan update.

Dear Oliver,

Thank you for your reply. Cluster developments, even in the 1980s, had to go through a subdivision process via community development, planning and permitting processes, in order to be platted and lots recorded with the auditor. According to county code, the remainder lot had a covenant placed that only allowed additional development on the remainder parcel, after it was included in an urban area. That too was recorded. I am very surprised that the county does not keep records adequate to recognize these lots, at the time of development. In addition, the remainder lot most certainly must be counted as an urban lot, and not as a rural lot. Therefore it would be wrong to count the parcel in the overall count in the rural area, using rural density. Even more so, it would be wrong for the lot to be counted in the urban count at urban densities, because one does not know what the city will be doing with the parcel when it does go into the UGA. It could be used for commercial, industrial, or housing at a much higher density, than in rural areas. In fact the whole purpose for these large remainder lots was to allow for large parcels for the urban areas to accommodate commercial development, and that is what the landowner expected would happen. Even in the 1980s, the cities got what they wanted and landowners used that option for their benefit. It was a win-win situation. The problem came when those clusters were required by Clark County to use urban development standards at the time of development. This is where the "urban sprawl" concept came from and a moratorium was placed on the cluster in 1993. To now add them to the rural lot count is wrong. One can just look on a parcel map to see where these developments occurred, because the parcels are a cluster of one acre lots, surrounded by a very large parcel, often in many hundreds of acres in size. Going to the assessors page, one will find the name of the development, as they were often called subdivision names, like "Helen's View". It is not hard to determine them, via the maps. In the Alt 4 map, only the one acre parcels should be recognized in a one acre zone, but the remainder lot is a "no man's land", and should not be counted, until inclusion in the UGA. The city then determines its use. CCCU believes that those remainder lots were indeed counted as rural lots at an urban density, in the Alternative 4 rural lot count. That would be the wrong thing to do, given the circumstances of their creation and purpose. To do so, would artificially, highly inflate the overall lot count in the rural and resource areas in Alternative 4.

Best Regards, Carol Levanen, Ex Secretary, CCCU, Inc

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

From: "Orjiako, Oliver" <Oliver.Orjiako@clark.wa.gov>
To: 'Carol Levanen' <cnldental@yahoo.com>, "Stewart, Jeanne" <Jeanne.Stewart@clark.wa.gov>, "Olson, Julie (Councilor)" <Julie.Olson2@clark.wa.gov>, "Mielke, Tom" <Tom.Mielke@clark.wa.gov>, "Madore, David" <David.Madore@clark.wa.gov>, "Boldt, Marc" <Marc.Boldt@clark.wa.gov>
Cc: "Schroader, Kathy" <Kathy.Schroader@clark.wa.gov>
Sent: Tuesday, January 19, 2016 8 39 AM

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

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>

To: Carol Levanen <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)

Sent: Sunday, January 17, 2016 6:27 PM

To: 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

This e-mail and related attachments and any response may be subject to public disclosure under state law.