

Feb. 9, 2016 - REC'd FROM CAROL LEVANEN - PLT
CC'd = BOCC; ORJAKO; SCHROADER

February 9, 2016



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

Dear Councilors,

The most important aspect the Board of Councilors need to consider in the 2016 Comprehensive Plan update is accuracy. Without accuracy, the Plan becomes clearly erroneous or clearly wrong, and will not comply with the mandates of the Growth Management Act. Alt 4 is the only alternative that consists of accuracy. It is a composite of research data from development, engineering, agriculture, forestry, public utilities, sewage disposal, department of ecology and rural landowners. In contrast, planning staff used a "cooking the books" and "smoke and mirrors", approach to planning in Alternatives 1, 2, and 3, which will not hold up in court. Clearly erroneous examples abound in the update of the 2016 Comprehensive Plan.

Clark County failed to use the soils manual for determining resource land designations, even though they said they did. Clark County had a 1977 Comprehensive Plan soils map, including two pages explaining prime, good and poor soils. Planning staff threw that map and information out, in the 1994 Plan, and created a different incorrect map. They continued to use the same incorrect information in subsequent updates. The only metadata found to explain designations of resource land in Clark County is one page that says only aerial photos, staff interpretation and assessors data was used. This is clearly erroneous.

State law, county code and CTED discuss cluster development to preserve resource land by setting aside large remainder lots with a code and covenant. But, county staff uses these "no man's land" parcels in the buildable lands calculations for whatever development purpose they choose. This is clearly erroneous.

Planning staff has persistently ignored past court rulings, by continuing to use an unauthorized formula to create and maintain the Comprehensive Plan rural and resource land designations and zoning. This formula ignores existing development and results in a cap on rural development. This is clearly erroneous.

Planning staff claims realistic assumptions were used to plan rural areas, yet the 2004 Comprehensive Plan says assumptions were used to plan only urban areas. When simple criteria regarding cluster remainder lots, over 25% steep slopes or national wetlands maps are used, GIS computer models easily show the correct numbers. But, those numbers are not being used by the planners. Instead, assumptions are being manipulated to inflate the available buildable lands with unrealistic numbers. This is clearly erroneous.

Planning staff claims that appropriate planning assumptions are being used in the 2016 Plan update and hope the councilors will ignore the facts. Clark County Citizens United, Inc. urge the councilors to see through this screen. CCCU expects the councilors to reject clearly erroneous actions, in favor of accuracy.

Sincerely,

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

Schroader, Kathy

From: Tilton, Rebecca
Sent: Wednesday, February 10, 2016 1 26 PM
To: Orjiako, Oliver, Schroader, Kathy
Subject: Comp Plan Testimony from Feb 9, 2016
Attachments: Levanen_Carol_020916CompPlanComments pdf, Rasmussen_Susan_020916CompPlanComments pdf

Hello,

For your records, please see the attached written testimony from Carol Levanen and Susan Rasmussen (received during public comment on Feb 9, 2016)

Thanks!
Rebecca

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