



From: susan rasmussen
Sent: Tuesday, March 8, 2016 9:29 AM
To: susan rasmussen
Subject:

A scientist, Galileo, had known for years from his personal study and observations, that the earth traveled around the sun. However, the County Planners (otherwise known as the Roman Inquisition), forced Galileo to recant or face the prospect of being burned at the stake or be non-compliant to the GMA laws. Galileo thus abandoned the truth founded in science, and adopted the earth-centric view of the world.

Legend has it that Galileo had access to many convincing arguments with many factual studies, along with the County's own reports, to back up his claims. However, the County Planners (The Inquisitioners), didn't care much for settled science nor rural citizen input.

There's been a lot of work done, along with citizen input from the rural landowners, that could eventually lead to a more truthful outcome for the Final SEIS.

CCCU challenges the status quo, the presumed settled science of the day. I challenge this Board to crack open the GMA, observe what other counties have done, look at the record of public input and examine the proper facts. Let that be your guidance...no matter where it leads.

The heart of the Poyfair Remand addresses the county's use of an "unauthorized formula." It was clear from the beginning of this update process that nothing has changed despite this Superior Court Declaration. The planners are still using an unauthorized formula because a predisposed result was first written before the public process even began. The public process then can be best described as a sham. If this Board doesn't recognize the shameful public process that has been employed along with the contaminated desired result, then this Board is just as contaminated. The sad part is that the futures of our lands hang in the balance of your contaminated decisions.

It was shameful that no effort was put forth to give a neutral evaluation of what the rural landowners were advancing.

It was shameful that the planners have done everything they could to bury the rural alternative 4.

Clark County average household size:

The Clark County comprehensive plan update was developed with the assumption that 2.66 individuals per household would remain consistent and thus require between 4,835 and 4,870 new rural housing units to accommodate population growth over the next two decades ($(129,556/2.66)*.10$).

Findings: The projected population increase of 129,556 (Table S-1, Page S-2) over the next 20 years indicates that there is a need for 4,870 new residential units in the rural areas of Clark County. 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.

Response: According to recent census data, after nearly 50 years of average household size decline, the average person per household number in the US is on the rise. There is need to take these calculations into consideration when determining the projected average household size over the next 20 years.

Clark: According to the US Census bureau the total estimated population for Clark County Washington in 2014 was 438,272 and the total number of housing units were 169,520. The ratio (438,272/169,520) is equal to 2.60 person's per-household.

WAC: Washington State has an average household size of 2.54 which is below the national average of 2.61.

Whatcom: US Census data indicates that the average household size for Whatcom County is 2.50 which is below the state average of 2.54 and below the national average of 2.61

Pierce: US Census data indicates that Pierce County has an average household size of 2.6 which is equal to the national average of 2.61. The Pierce County BLR accounts for a smaller average household size when calculating 20 year population projects and need for additional residential units. The number is adjusted down from the 2000 census date to reflect a trend of decreasing household sizes. Pierce County's buildable lands model assumes an average household size of 2.8 pphh. The projected number is used to build a cushion and to stay consistent with the national trend of an increase in average pphh. The Pierce County buildable lands report does not use a total county wide pphh calculation for its projections, but rather the ratio is broken down into local city jurisdictions

Spokane: US Census data indicates that Spokane County has an average household size of 2.43 which is below the national average of 2.61.

Thurston: US Census data indicates that Thurston County has an average household size of 2.5 which is below the national average of 2.61.

King: US Census data indicates that King County has an average household size of 2.4 which is below the national average of 2.61.

The GMA also requires jurisdictions to periodically review their comprehensive plans and implementing development regulations in their entirety and, if needed, revise them. Clark County is required to have this review and revision completed by June 30, 2016, and every eight years thereafter (36.70A.130(5)(b) RCW). Opportunities for public participation in this process will be provided (36.70A.035 RCW).

More about the history of planning in Clark County can be found on the County's webpage:

<http://www.co.clark.wa.us/planning/2016update/background.html>

What Is the State Environmental Policy Act?

The State Environmental Policy Act (SEPA), enacted in 1984, requires local jurisdictions to evaluate potential environmental impacts of actions they approve or undertake. The most common evaluation looks at potential environmental impacts of a proposed project, such as a new road or big box store. It also requires environmental review of a large non-project action, such as adoption of a planning document like a new comprehensive plan. The SEPA process prescribes elements to be evaluated, and if it is determined that significant impacts to the environment are probable, an environmental impact statement or EIS, is prepared. An EIS is the forum for discussing alternative actions and the probable impacts from those actions. The EIS document is shared with residents, interested organizations, federal, state and local agencies, and tribes to obtain input on the findings. People can comment on the alternatives, mitigation measures, probable significant adverse impacts or other relevant topics. Because the EIS process for the last major update of the County Comprehensive Plan thoroughly evaluated the impacts of large-scale growth alternatives, and the proposed changes for this update are generally anticipated to be of a similar or lesser-scale than in the previous analysis, the County has determined that an update or supplement to that analysis through this Supplemental EIS, would be the appropriate method for disclosing the impacts of alternatives to accommodate projected growth through 2035.

What Are the Assumptions for Growth in 2035?

The following table summarizes the assumptions used in the development of the three growth alternatives. For additional details, see Chapter 1.

Table S-1. Summary of Planning Assumptions

Item	Assumption
Total population projection for 2035	577,431 total county population
Projected new residents	129,566 new residents
Urban/rural population growth split	90% of new growth in urban areas; 10% in rural areas
Annual population growth rate	1.25% assumed per year
Housing type ratio	Up to 75% of one housing type
Persons per household	2.66 persons per household
New jobs	101,153 new jobs
Jobs to household ratio	1 new job for every 1 new dwelling unit
Residential infrastructure deduction	27.7% deducted from gross residential land supply
Commercial/industrial infrastructure deduction	25% deducted from gross commercial/industrial land supply

Exhibit 3
Use of Invalid instead of Indeterminate

The use of the term "invalid" over "indeterminate" was based on three precise factors.

The primary factor for using invalid over indeterminate is that R.W. Thorpe & Associates, Inc. was tasked with examining the validity of each assumption on their face. The contract reached between Clark County and R.W. Thorpe & Associates, Inc. states "Step 1: Review the Planning Assumptions introduced on November 4, 2015 (Alternative 4.b) and provide professional opinion on the validity of these assumptions and whether they should be applied to the Vacant Buildable Lands Model for the rural lands.". Assumptions which were found to not be based in-fact would therefore need to be excluded from the VBLM.

Secondly, the definition of "validity" is to "hold water, to be valid, sound, and defensible; to show no inconsistency when put to the test."¹ Assumptions therefore, would either need to be valid and based in truth or not valid at all. Under the contract guidelines, R.W. Thorpe & Associates, Inc. was responsible to determine which assumptions were based in truth. Determinations of invalidity were made through analysis of state and county code and a best practice review of similar counties.

Finally, GMA (RCW 36.70a.070) guidelines stipulate that local circumstances may be considered at the county's discretion, however, a written record of explanation is required to justify how the adopted rural assumptions harmonize with GMA planning goals. Since no written record is available, and no credible evidence is available to justify the Alternative 4.b planning assumptions, the burden of proof falls to the county to prove their rationale. Since no rationale was provided, indeterminate is not a possible option for deciding which assumptions should be included in the VBLM.

RCW 36.70a.070

(5) Rural element. Counties shall include a rural element including lands that are not designated for urban growth, agriculture, forest, or mineral resources. The following provisions shall apply to the rural element:

(a) Growth management act goals and local circumstances **Because circumstances vary from county to county, in establishing patterns of rural densities and uses, a county may consider local circumstances, but shall develop a written record explaining how the rural element harmonizes the planning goals in RCW 36.70A.020 and meets the requirements of this chapter.**

(b) Rural development The rural element shall permit rural development, forestry, and agriculture in rural areas. The rural element shall provide for a variety of rural densities, uses, essential public facilities, and rural governmental services needed to serve the permitted densities and uses. To achieve a variety of rural densities and uses, counties may provide for clustering, density transfer, design guidelines, conservation easements, and other innovative techniques that will accommodate appropriate rural densities and uses that are not characterized by urban growth and that are consistent with rural character

¹ "Validity" *The Free Dictionary* Farlex Web 20 Jan 2016

Schroader, Kathy

From: Tilton, Rebecca
Sent: Wednesday, March 09, 2016 12:55 PM
To: Orjiako, Oliver, Schroader, Kathy
Subject: Comp Plan Comments
Attachments: Rasmussen_Susan_030816CompPlanComments.pdf, Levanen_Carol_030816CompPlanComments.pdf

Hello,

For your records, please see the attached written testimony received from Carol Levanen and Susan Rasmussen on Mar 8, 2016.

Thank you!
Rebecca

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