FOR THE PUBLIC RECORD OF THE 2016 CLARK COUNTY COMPREHENSIVE PLAN UPDATE

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 Onjako 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 parcel. 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." "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 if 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 Onjako 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. Onjako'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