

**Schroader, Kathy**



**From:** Wisner, Sonja  
**Sent:** Monday, June 20, 2016 7:55 AM  
**To:** Tilton, Rebecca, steve.dijulio@foster.com, Albrecht, Gary, Alvarez, Jose, Anderson, Colete, Euler, Gordon, Hermen, Matt, Kamp, Jacqueline, Lebowsky, Laurie, Lumbantobing, Sharon, Orjiako, Oliver, Schroader, Kathy, Wisner, Sonja  
**Subject:** FW: Clark County Citizens United, Inc. concerns regarding the 2016 Comprehensive Plan Report # 6 - For the Public Record

Fyi and for the record

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**From:** McCauley, Mark  
**Sent:** Saturday, June 18, 2016 7:41 AM  
**To:** Orjiako, Oliver; Wisner, Sonja  
**Subject:** Fwd: Clark County Citizens United, Inc. concerns regarding the 2016 Comprehensive Plan Report # 6 - For the Public Record

Sent from my iPhone

Begin forwarded message

**From:** Carol Levanen <cnldental@yahoo.com>  
**Date:** June 17, 2016 at 8:04:10 PM PDT  
**To:** Julie Olson <julie\_olson2@clark.wa.gov>, Jeanne Stewart <jeanne\_stewart@clark.wa.gov>, Marc Boldt <marc\_boldt@clark.wa.gov>, "Tom Mielke" <tom\_mielke@clark.wa.gov>, David Madore <david\_madore@clark.wa.gov>, Mark McCauley <mark\_mccauley@clark.wa.gov>  
**Subject:** Clark County Citizens United, Inc. concerns regarding the 2016 Comprehensive Plan Report # 6 - For the Public Record  
**Reply-To:** Carol Levanen <cnldental@yahoo.com>

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

July 17, 2016  
For the Public Record

Clark County Citizens United, Inc. concerns over the 2016 Comprehensive Plan - Report #6

Chapter 3, Rural and Natural Resource Element - page 6, states that, "Quality soils are a primary factor in classifying and designating agricultural resource lands, and goes on to quote the GMA. But, the Public Record demonstrates that when the resource lands were designated in 1994, the criteria used was via aerial photography and staff interpretation, not quality soils. In 1994, there was much discussion regarding contiguous lots, blocking up areas, and designating poor soils for agriculture. The current resource lands designations and zoning continue to be the same designations determined by staff, in 1994. They haven't changed, except for annexations to urban areas. The majority of the resource land in Clark County was illegally created via different criteria than what is mandated in the Act. Clark County has a legal and moral obligation to correct the incorrect resource land designations, and recognize existing development patterns.

Chapter 3, Rural and Natural Resource Element, page 13-14, Community Framework Plan - states, "Clark County adopted the Community Framework Plan in April 1993. The Framework Plan established a consensus among the citizens of the county about the lands, County Wide Planning Policies - The county shall recognize existing development and provide lands, which allow rural development in areas, which are development or committed to development of a rural character." This was the intent of the people in 1993, during the visioning that occurred at the onset of GMA Planning. Clark County has never complied with these mandates from the people. Instead, staff continues to change these policies to create a Plan that was never envisioned by the citizens of

Clark County Judge Poyfair recognized this flaw in the 1994 Plan and directed the Western Washington Growth Management Hearing Board to direct Clark County to correct the mistakes. Neither the Hearing Board or Clark County compelled themselves to comply with those orders. Instead, they manipulated the Plan to create what they intended for the Plan in the beginning. Clark County must now be compelled to make those corrections according to the law.

Rural and Resource Element 3.1.2, page 14 states, "Land use designations include areas that are rural in character and meet one or more of the following criteria, 1 Generally characterized by a larger lot size 4 The area is contiguous with other rural lands 5 The area is not needed to provide capacity for population or employment, 6, The area has outstanding scenic, historic, environmental, resource or aesthetic values. Page 15 - Clark County's Rural Area is considered to be permanent land shall not be redesignated to an Urban Growth Area until reviewed. It is clear the full intent of this language is to prevent any and all development in the rural lands. Clark County's mandates are in direct contradiction to the GMA rural mandates, that direct counties to allow for a continuation of existing rural character and growth in those lands. All of this language must be struck from this chapter.

Rural and Natural Resource Element, page 27, 3.5.65, states, Agriculture activities shall be encouraged by 1 limiting residential development in or near agricultural areas 2 limiting public services and facilities which lead to the conversion of agricultural lands. " The GMA did not intend that housing be limited or prevented from being a part of agriculture land. This language needs to be removed from this chapter.

Sincerely,

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