

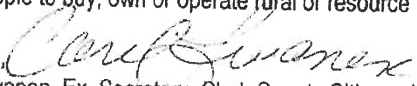


Clark County Board of Councilors

August 11, 2015

Clark County is not adequately planning for the growth that is expected for the next 20 years. There will not be enough housing for Clark County High School graduates, let alone for new arrivals. Page 1-3 Table 1.2 clearly shows the disparity. The Alternative 1 No Action Plan only allows for 354 annual housing units outside the urban areas. Alternative 2 allows for 57 more. Alternative 3 is the same as Alt 1. Alternative 4 allows for an additional 209 lots, but many of those already have housing units on them. Considering each successive high school graduating class, for approximately ten high schools, the numbers don't fit. Young families will want homes and the elderly will be downsizing. The county cannot expect them all to live in apartments. Clearly, housing is woefully inadequate in the Draft SEIS. Alternative 4 is the best choice for both housing and resource lands as it increases those parcels by 1132 more lots than Alt 1 and 124 more lots than Alternative 2. It will allow for more affordable rural and resource land to live and grow food and crops. It also allows the county to confirm prime soil and long term commercial significance of those lands.

**The University of Puget Sound Law Review - Vol. 16:867 Page 902 - "The GMA explicitly denies an order of priority among the 13 goals, even though some of them are mutually competitive.** Protecting Property Rights is one of those goals. Arbitrary government actions are a major concern. The massive down zoning of 2.5 acres to 20, 40, and 80 acres, in 1994, was arbitrary and nothing has changed. Property Rights must be treated with the same respect and power as all of the other goals and parcels that existed in 1994 must now be recognized in the zoning of the 2016 Comprehensive Plan update. **page 907 - While the two categories of special lands are lumped together (natural resource lands and critical areas) in the statutory provisions requiring their designation and protection, close attention to the ACTs goals and definitions reveals two quite different legislative purposes. Natural Resource lands are protected not for the sake of their ecological role, but to insure the viability of the resource industry** Prime soils are of primary importance for resource lands. The county failed to properly consider prime soils in the 1994 Plan and nothing has changed. In the 2016 update, Clark County must look closely at which lands have prime soil and how best to preserve them. To say something can grow is not enough to ensure the land can sustain an abundance of growth, well into the economic future. **Page 913 - However, notwithstanding the extensive process rights of cities, counties retain final authority to designate UGAs outside existing city limits. Every 10 years, the UGA process must be repeated and the UGA revised for the succeeding twenty year period.** Clark County is responsible for growth planning, while meeting the equal goals of the act. In the 2016 update, UGAs must respond to growth pressures for another ten years. If the cities are not willing to consider expansions for whatever reason, then it falls upon the county to assure those needs are met. **Page 936 - Nor does the Act specify maximum standards of density or intensity in rural areas aside from the circular provision "variety of rural densities, that are compatible with the rural character, should be allowed. Rural is not defined.** The Act does not specify density or intensity in rural areas, because it is dependent on rural character. The densities that historically have been considered rural in each particular county, determines the rural character. The 1994 Comp Plan massive down zoning of rural lands created an artificial character, that has never historical been the norm. The court has said that Clark County ignored the existing development in the rural area in the 1994 Plan, and it is imperative that corrections need to be made in the 2016 update. **Page 939 - The Act requires local plans to contain a housing element allocating adequate land for all forms of housing to serve all economic levels. The Act implies that each county and city must bear a fair share of regional housing needs.** The county is responsible for rural and resource housing. Currently, it is woefully inadequate because the large lots created in 1994 are not affordable. In the 2016 update, affordable housing must be reflected in rural and resource zoning, to allow people to buy, own or operate rural or resource land.

Sincerely,   
Carol Levanen, Ex. Secretary, Clark County Citizens United, Inc.

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