

susan rasmussen

Tue, Sep 8 11:18 PM

to jeanne.stewart@clark.wa.gov; david.madore@clark.wa.gov; tom.mielke@clark.wa.gov  
cc Carol Levanen; jim.malinowski@icloud.com

Re: Absent information in the draft SEIS



- Absent in the draft is any data of the current economic trends and conditions of the agriculture industry in Clark County. This is instrumental in providing the data to establish the predominate size of farms, and to access the "needs of the industry." The Lewis County court case (2006), upholds this. This also applies to the forestry industry. In 1970, Clark County was home to over 350 dairy farms. In 2015, there are 4-5. (Globalwise; Agriculture Trends and Conditions report for Clark County, 4/16/ 2007)
- Absent in the draft is any data of the ability of local farmers to gain water rights and irrigate their field crops. This directly speaks to the productivity and long-term commercial significance of the industry.
- Absent in the draft is the data contained in the USDA Census of Agriculture, 2012, Clark County profile. The Census for 1950 should also be included to establish any historical trends.
- Absent in the draft is the data to provide predominant sizes of parcels in rural and resource lands. The Pierce County court case, (2007), concluded that the county could categorize land by size. The court agreed with the county's actions based upon the county's reliance on reports of the predominant parcel size of small farms. "The predominant size of farms, the court concluded, was instructive on determining whether land has "long-term commercial significance for agriculture."
- Absent in the draft is data describing Clark County's unique rural character, per GMA. Which alternative plan best demonstrates the rural character of the region?
- Absent in the draft is data concerning opportunities to broaden the scope of rural jobs beyond natural resource based industries.
- Absent in the draft is data concerning the predominant non-conforming lots zoned F-40, F-80, and Ag-20, R-20, R-10, R-5. Less than 10% of the lots zoned F-40 conform to their size.
- Absent in the draft is data on how the alternative plans meet the intentions of the Wa. State Designated Forest Land, Dept. of Revenue; May 2014 report. Written in this report are the intentions of the current use taxation program that encourages the continued viability of the small forest landowners by supporting the 5 acre minimum requirement. 78% of Clark County's forest lands are privately owned. The state wide average is 50%. How does Clark County support the intentions of the program?
- Large numbers of Clark County residents have historically resided outside of the incorporated areas. This suggests that many citizens may theoretically oppose high density, urban lifestyles. The historic rural growth patterns are based in reality. The patterns are a result of generations of rural cultural practices. These growth patterns haven't ever been considered important enough to recognize and accommodate in any comprehensive plan. However, GMA recognizes the patterns as composing the county's unique rural character. On remand to CCCU's court action, the county was ordered to amend it's comprehensive plan by making reasoned zoning considering existing conditions. The draft is absent this data.

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- Absent in the draft is any market research on what kinds of lifestyles and housing Clark County citizens prefer. Which plan best accommodates a broad-spectrum of housing and lifestyle choices.
- Absent in the draft is data demonstrating the robust equine and 4-H communities. This data further supports that the citizens prefer a broad-range of lifestyle choices that may not relate to geographic locations.
- Absent in the draft is data of how each alternative plan provides recognition of private property rights. This is one of the 13 prime planning elements to consider in the GMA. Each element carries equal weight.

Please be so kind as to include this with the comments for the draft SEIS. All of the supporting documents, the USDA Ag. Census reports, the Globalwise Report have been entered into the public record by CCCU.

Thank you,  
Susan Rasmussen for  
Clark County Citizens United, Inc.

**From:** susan rasmussen

**Sent:** Tuesday, September 8, 2015 9:17 PM

**To:** jeanne.stewart@clark.wa.gov, david.madore@clark.wa.gov, tom.mielke@clark.wa.gov

**Cc:** Carol Levanen, jim.malinowski@icloud.com

The draft SEIS says the document's intent is to provide the county, cities, public and agencies with environmental information to be considered in the decision-making process. It also allows residents, businesses, and other agencies to comment and question proposals and alternative plans.

By having said the function of the draft is to provide information needed by the decision makers, this DSEIS then proceeds to take the decision making function into its own hands.

Dozens of examples exist where the document declares under Alternative 4 that certain negative situations would result. These statements, repeated in one form or another throughout the draft, are inappropriate policy decisions by the writers of the draft. Policy makers are tasked to create the policy decisions. The writers and professional consultants creating the contents of the draft are tasked with providing accurate information needed to make informed policy decisions in an unbiased, neutral manner.

Policy decisions are not supposed to be made by planning staff and, most importantly, policy decisions are not supposed to be made in a way that herds decision makers through corrals of select information and into a holding pen where they will undoubtedly make predetermined decisions.

Much pertinent information is missing in the draft, especially pertaining to the economic trends and conditions of Clark County's agricultural, and forestry industries, rural land parcelizations, and private property rights. This is one overt example of the desires of the writers selecting the data rather than allowing the data to determine key likely outcomes.

All Clark County Comprehensive plans should be criticized for not acknowledging and accommodating private property rights issues. There has been little or no real protection for property owners. However,