## Factors used to support a No Growth Agenda



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Factors used to support flawed numbers and a no growth agenda:

- The Clark County GIS metadata, and landowner testimony, confirms the inappropriate use of aerial photography to designate resource lands. GMA mandates the use of the NRCS Soils Manual.
- Using large lot zoning regulations to prevent land divisions. This disregards historical patterns of lot development and is counter to GMA mandates.
- Imposing urban holding and urban reserve overlays for 20 years. Overlays are a planning tool (5 year expiration). This is as illegal use of the overlays as zones void of a public process. This is counter to GMA.
- Failing to provide fair opportunities for rural communities to participate as stakeholders with equal standing among the jurisdictions. A GMA compliant process ensures inclusive participation, collaboration and fair treatment of those most affected by the proposals. This ensures private property rights are protected, a planning goal per GMA (pg. 37, RCW 36.70A.020). Clark County fails to mention private property rights in any of their comprehensive plans.
- Employing low population figures is inconsistent with actual data. This is not GMA protocol. Using flawed data subordinates the vacant buildable lands analysis and status quo, "There is plenty of buildable land for years to come."
- Not using realistic urban/rural ratios are inconsistent with historical trends.
   This is counter to GMA mandates.
- Inflating the rural and resource lot numbers by not eliminating the non-buildable lands in the analysis (remainder lots, critical lands, wetlands, 27% allowance for infrastructure, 15% market variance, easements, buffers, land division covenants, parks, etc.)
- Failing to provide adequate reviews and proven data. There has never been a
  mechanism in place to provide checks and balances of the work. Failing to provide-

reviews handicaps the work of the BOCC and impacts the Board's ability to provide responsible oversight. This is critical to the process.