



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

November 24, 2015

Dear Councilors,

The GMA discusses the inappropriate conversion of rural land into urban sprawl, with "urban" meaning urban size lots and services, and "sprawl" meaning irregular distribution of urban type development. To prevent sprawl, the GMA states what is rural and what should and should not be allowed in rural areas. It defines and discusses allowances in **RCW 36.70A.030 Definitions**, and in other passages of the GMA. Given the parameters of the GMA regarding rural and urban services, what is generally accepted and considered to be urban versus rural in a technical sense?

The Natural Resource and Conservation Service (NRCS), Department of Defense, and United States Postal Service (USPS) uses a formula of 1000 persons per square mile as the definition of "rural". The 1980 (amended 1988) Clark County Comprehensive Plan defines rural as having 50 to 1000 persons per square mile. All have various definitions of rural, resource and rural development within their policy documents. But, one thing they have in common is a statistical definition of rural which is the basis for their policies. The formulas are used for financial aid, grants and economic assistance. Conversion of one square mile to square acres equals 640 square acres. Dividing the square acres by 999 equals .64 acres, or a little over one half acre. Multiplying that number by 2.66 persons per household proposed by the DSEIS, equals 1.7 acres. Therefore, state and federal agencies recognize rural areas as having approximately a one half acre parcel. Clark County recognized their rural areas the same way from 1980 to 1994. Using the current proposed household numbers, the county should consider 1.7 acres as being rural and not urban, if urban services are not being provided. The Growth Management Act, **RCW 36.70A.011 Findings- Rural lands**, discusses rural lands and rural character as important to Washington state's economy. **RCW 36.70A.030 Definitions**, discusses resource lands and rural lands, what they are and what they must be. There is a great deal of documentation in Clark County archives and public records supporting statistical definitions of rural, with small parcels similar to 1.7 acres.

Alternative 4 recognizes existing development patterns and historical rural character. It also accurately fits all of the descriptions contained in the GMA. It makes no sense to force the Comprehensive Plan into the courts by not recognizing these facts. There is no question Alternative 4, Option B, should be the preferred choice and Clark County Citizens United, Inc. urges recognition of technically correct "rural", by accepting these documents for review.

Sincerely,

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

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