

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



December 22, 2015  
For the Public Record

Dear Councilors,

**Under 36.70A.212 - the Department of Commerce Buildable Lands Program Guidelines - Page 17** states, "The basic types of annual data are described below in four categories: (1). Urban and rural land uses and development (2) Critical areas (3). Capital facilities (4). Measures adopted to increase consistency. Page 18, (2) Critical areas - Baseline data, states, " Local governments should collect annual data on critical areas so they can incrementally update their land inventories with the most current information on critical areas that relates to the reduced development potential for the parcels on which they are located. Page 25, (2) states, "Critical areas and buffers to the extent that development is preceded as determined by local development in and around critical areas Page 30 , states, "All assumptions made during the data collection and evaluation periods need to be well documented."

Page 31, Next Step After Initial Evaluation, states, " If inconsistencies are found between what was envisioned and what actually occurred, the county and it's cities must adopt and implement measures that are reasonably likely to increase consistency...does the system being used provide reasonably accurate data and enough consistency to evaluate the results on a county wide basis. How have disputes among jurisdictions been resolved.? Would new technology be more effective in collecting or evaluating data? Page 45 - Appendix D - Buildable Lands statute - RCW 36.70A215, Review and evaluation program (b). states.." identify reasonable measures, other than adjusting urban growth areas, that will be taken to comply with the requirements of this chapter (a) Encompass land uses and activities both within and outside urban growth areas and provide for annual collection of data on urban and rural uses, development, critical areas....

The Washington Research Council Special Report - 2007 Buildable Lands Process, Part I, January 15, 2008, states, "...once the raw data of buildable land is collected, a series of reductions is made to arrive at an estimation of the land that would truly be available for development. In Conclusions it states, "The migration patterns..are a testament to the inadequacy of the housing supply in the Puget Sound and Portland areas." Part II Figure 2 ...shows ...the total unit capacity for Clark County cities and their associated UGA's alongside their most recently adopted 2004 targets. The picture here is not promising, with the county as a whole showing a deficient in development capacity and Vancouver itself showing a major deficient....To a large degree, Clark County is not in control if it's growth....Thus the sufficiency of land capacity asserted in the Clark County Buildable Lands report is predicated on a couple of dubious assumptions. Clark County leaders have good reason to question the assertions of sufficiency in their current Buildable Lands report (of 2007).

The preferred Alternative 4 with associated documents correct these "dubious assumptions" and attempt to show "sufficiency of land capacity" required under the GMA. in doing so, Clark County is on the right path to realistic planning. This will go a long way in correcting the "inconsistencies" while doing the right thing.

Sincerely, 

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