



Clark County Board of Councilors
PO Box 5000
Vancouver, Washington 98666

y 12, 2016

Dear Councilors,

In 1994, Clark County designated thousands of acres as resource lands using nothing more than aerial photography, staff interpretation of those photos, current use status, and little else. Any open space, was called agriculture. If it had trees, it was called forest. The lands were demarcated by a tape or marking pen. This placed thousands of acres in an incorrect resource zone while downzoning thousands of acres throughout rural and resource lands into large lot zoning. These resource designations never changed, in subsequent updates of the Comprehensive Plan and after twenty years, it is time that happens..

Enclosed are two 1993 aerial photos used to determine resource land. You can see the tape that was used. Clark County would not produce these photos when under appeal, even though they were noted in the Index of the Public Record. While searching the public record, CCCU came across one of them that demarcated two twenty acre parcels into resource land with a permanent marker, and then downzoned the surrounding parcels as 40 acre resource land. Those parcels were five to 10 acres in size.

Enclosed is a May 12, 1993 page from the Clark County GIS Metadata Information Browser. It supports the maps and was the only logistic document found that described how the GMA land use was determined for the 1994 Comprehensive Plan. It states, "Landuse polygons for 1994 GMA Depicts land uses within Clark County as determined by the Planning Department. It is a combination of the Assessors Landuse (Primary Property Type) and the mapping department's Photo Interpretation." It goes on to say, "Parcels greater than 1 acre were classified using photo-interpretation." A 2014 GIS steep slopes greater than 25% map, compared to the steep slope map used in 1994, shows the stark difference between the two.

The GMA has specific criteria in the RCWs and WACs regarding how and why resource land is designated. Even though Clark County states they used these criteria when they designated resource land, it is obvious from these documents, public testimony, soil samples, and critical land maps, that they did not. The county needs to recognize those lands according to predominant parcel size and re-designate those lands correctly, according to mandates of the GMA, which requires prime soil, production, predominant parcel size, proximity to populated areas, surrounding development and consideration of a higher use.

Sincerely,

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

3036

036822