

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



March 29, 2016

Dear Councilors,

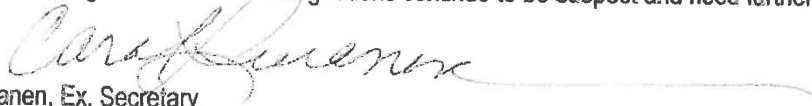
The Clark County Councilors believe the former Preferred Alternative of November 24, 2015 would be illegal under the GMA, but that is not true. In fact, the first Alt 4 draft came right from GMA language which consistently directed it's creation, with each portion carefully weighed with the Act. It was a mistake not to choose that Alternative for the 2016 Comprehensive Plan FSEIS.

October 9, 2013, county staff presented a power point at a Commissioners Work Session, called, **Vacant Buildable Lands Model**, for the 2016 Comprehensive Plan update. The Model measured acres of developable land, based on a formula agreed upon by the cities, county and supposed community. Three Models included residential, with Model Names 1994-P, 2004-J and 2007-V. The Countywide Time Series, County Wide Residential Gross Acres, consisted of underutilized, constrained, underutilized, vacant constrained and vacant land. **Countywide All Vacant Buildable Land** included residential, gross acres to Net acres, never to convert, environmental constraints, infrastructure, and gross acres split into commercial and residential. The Yield Report had housing units per acre, critical, residual and commercial with origins of 1992 to 1994. The Plan Monitoring Technical Advisory Committee (TAC) was the Responsible Growth Forum and Friends of Clark County. No mention was made of rural or resource landowners. This report shows Clark County used a VBLM for all lands. But, at a recent Councilor hearing, staff insisted a VBLM was not used for rural lands because Judge Poyfair's ruling of 1997, said a VBLM could not be used in rural areas. This Model was used from 1996 to 2013. Clearly this was not just a simple lot count of rural lands, as staff has insisted at recent Councilor hearings.

Oregon Metro Planning has Clark County, Washington as part of their planning scheme, even though they are not under Washington state law. A careful review of the Growth Management Act shows nothing in the Act directs a county to allow another state to plan or direct planning in this state. Portions of the GMA that discuss regional planning are intended to apply to adjacent Washington counties and cities, not other states. In **Metroscope and the Urban Growth Report of the Housing Needs Analysis** of October 26, 2015, it clearly shows the state of Oregon is the key player in planning for Clark County, Washington. In the name of "regional planning", Portland, Oregon has taken over the entire county of Clark and plans for 24% of it's residential housing to be located in the Washington county. In addition, Metro has also dictated what type and how much housing, industrial and commercial development will occur here for the next twenty years. This is not what the Washington state legislature intended when they adopted the GMA.

CCCU asks the Councilors to reconsider the previous Preferred Alternative as the Preferred Alternative. It was a well thought out plan that is consistent with the wants and needs of Clark County, even though resource land designations continue to be suspect and need further review.

Sincerely,

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

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