

November 15, 2018

FOR THE PUBLIC RECORD

Clark County Planning Commission  
P.O. Box 5000  
Vancouver, Washington 98666

**Regarding Urban Reserve in the Clark County Comprehensive Plan**

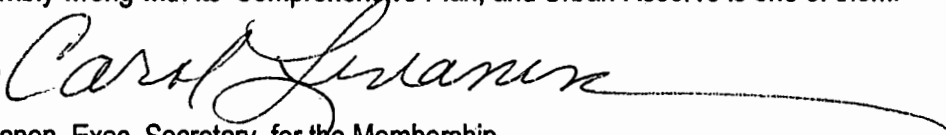
Dear Planning Commission Members,

The Washington State Growth Management Act dictates to each county particular criteria they must follow as they comply with the GMA. RCW 36.70 and 36.70A, along with other RCW's present with various mandates, recommendations and criteria used in planning for growth. Urban Reserve is not one of them.

**RCW 36.70A.110 Comprehensive plans – urban growth areas (1)** states, *“Each county that is required or chooses to plan under RCW 36.70A.040 shall designate an **urban growth area** or areas within which urban growth shall be encouraged and outside of which growth can occur only if it is not urban in nature. Each city that is located in such a county shall be included within an **urban growth area**. An **urban growth area** may include more than a single city. An **urban growth area** may include territory that is located outside of a city only if such territory already is characterized by urban growth whether or not the urban growth area includes a city or is adjacent to territory already characterized by urban growth or is a designated new fully contained community or defined by RCW 36.70A.350.”*

That's it. There is no mention of urban reserve, in addition to the urban growth area, in the entire GMA. Where that designation came from, is anyone's guess, but it doesn't belong any where in the Comprehensive Plan. Since 1994 and for 24 years after, Urban Reserve functioned like a zone, and prevented the land from being used for its' rightful use. Landowners were frozen in time, until the Urban Reserve was lifted, which never seemed to happen. Now, the county wants to remove it for developers, which may be a wrong reason, but nonetheless, it needs to be removed. Urban growth areas allowed uses consistent with zoning, but that was not the case for Urban Reserve. It is long overdue for all Urban Reserve areas to be returned to their rightful place as either rural land, resource land, urban land or within the urban growth area. Clark County must fix what is terribly wrong with its' Comprehensive Plan, and Urban Reserve is one of them.

Sincerely,



Carol Levanen, Exec. Secretary, for the Membership

Clark County Citizens United, Inc.  
P.O. Box 2188  
Battle Ground, Washington 98604