

**From:** [Carol Levanen](#)  
**To:** [Eileen Quiring](#); [Kathleen Otto](#); [Gary Medvigy](#); [John Blom](#); [Julie Olson](#); [Temple Lentz](#); [Jose Alvarez](#)  
**Subject:** Fw: Clark County Growth Rate - FOR THE PUBLIC RECORD  
**Date:** Friday, May 1, 2020 1:49:00 PM

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**Information to be included into the Vacant Buildable Lands process, taken from online research by Clark County Citizens United, Inc.**

Clark County, Washington Population 2020

<b>Year</b>	<b>Population</b>	<b>Growth Rate</b>
2018	481,857	1.55%
2017	474,492	1.97%
2016	465,310	1.82%
2015	456,986	1.94%

**From:** [Carol Levanen](#)  
**To:** [Eileen Quiring](#); [Kathleen Otto](#); [Gary Medvigy](#); [John Blom](#); [Julie Olson](#); [Temple Lentz](#); [Jose Alvarez](#); [Mitch Nickolds](#)  
**Subject:** [Contains External Hyperlinks] Fw: Vacant Buildable Lands Committee Meeting - FOR THE PUBLIC RECORD  
**Date:** Friday, May 1, 2020 1:01:14 PM

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Clark County Citizens United, Inc. P.O. Box 2188 Battle Ground, Washington 98604 E-Mail  
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**Sent:** Friday, May 1, 2020, 12:51:35 PM PDT  
**Subject:** Vacant Buildable Lands Committee Meeting - FOR THE PUBLIC RECORD

FOR THE PUBLIC RECORD

Dear Councilors,

It is important that you scrutinize these ten items, as you consider changes to the VBLM. The following are excerpt of the latest ECONorthwest report and Clark County Citizens United, Inc.'s concerns. Important research data has been submitted to the consulting firm, but CCCU does not see those items being used in the process. In addition, questions to the consultants are not being adequately addressed in the reports.

ECONorthwest report item 1. *Recommendations for “approved” at this meeting will not be revisited until final PAC meeting unless PAC requests to revisit.* (this is under Recommendation Process in their power-point)

There has been so little discussion and interactions from the committee, they are clearly uneducated over the process. It would be impossible for any approval of any item because they would be making premature decisions, when they are not aware of the impact of those decisions.

It's the process that concerns me here.

Why put limitations and deny re-visitations?

This is problematic since “rural” discussions have been left out and won't be on the agenda until July 10. Shouldn't everything endure scrutiny to see how it all

dovetails

together before any approvals are voted on and accepted?

2. GMA Planning Goal 5, Economic Development: **RCW 36.70A.215**

*“Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state’s natural resources, public services, and public facilities.*

This is state law the county is to follow. The ECONorthwest consulting firm information does not address this law. It is well known that the rural areas are experiencing economic losses far greater than urban areas. There has to be equity under this GMA law. How has this been addressed?

It isn't realistic for rural communities to depend on jobs related to natural resource industries and are based on commodities. Those jobs do not provide reliable family-wage earning jobs. The USDA Census of Agriculture shows the average Clark County farmer operated at a deficit of over -\$4,800 the past five years.

With the potential of the **Chelatchie Prairie Rail** line to produce associated jobs, and with the anticipated expansion of **Illani** tribal land and additional facilities, **what jobs percentages should we be looking at in north Clark county?**

3. Looking over 20 years, should we be adjusting the population allocation to be more in tune with the potential population growth and potential jobs in the north county area. That would enable us to allocate housing so people would be able to live where they work. **Adjust the existing 90/10% urban to rural split to be more reflective of the reality of 85/15%.**

This formula was deemed to be illegal in 1997 and 1999 by the courts. Because this formula is being used, the rural capacity has shrunk dramatically to the point that there will no housing opportunities in rural and resource areas within the near future. The GMA does not allow that.

4. We should be examining all **LAMIRDS** across the county. They come in all varieties and forms. They include small scale industrial commercial activities, tourist uses, retail activities, and provide essential services (fire stations in particular). These do not require additional urban services to function and would compliment the rural economy, provide sources for jobs and essential services for rural communities.

The county staff attempted to remove LAMRIDS in 1994, but the courts ruled against them. Staff now claims only those areas are allowed for potential

rural housing growth in the county. But, the GMA only gave counties an option for another addition to traditional rural housing potential, and did not intend them to be a replacement.

When the expanded state highway came in (SR-502) and extended to I-5, land was taken away in Duluth and Dollars Corner. Businesses and jobs went away and land hasn't been replaced. The county literally set up commercial activities in small areas and drew a 1995 circle around them. **TIME CAPSULES WERE CREATED.**

Are they allowed infill, redevelopment? What are the options for **LAMIRDS**? Are they not allowed to grow and reflect the needs of new populations, a changing built environment and reflect the demographic of the people they serve? **LAMIRDS** are meant for economic opportunities and development. We're not seeing that happen.

5. Treatment of Yacolt, rural communities in general, overreach of staff's authority. **Equity** should not only be reflected in the work, products produced and ultimate outcomes of this Committee. **Equity** should be woven throughout **all processes** used here.

Do we need an agreed-upon framework for using an **equity-lens** in the **process**? This would help ensure equity is embedded in all effort put forth for the benefit of all communities. This helps ensure staff operates with a **neutral stance** and one jurisdiction's goals aren't advanced at the expense of other jurisdictions. (seems that most if not all work is about Vancouver).

**Does this need to be official? Do we need to propose a formal recommendation** here? A formal recommendation is reasonable considering that staff and EcoNorthwest are doing all of the work and the Committee is completely reliant on the integrity of that work.

6. There is very little in the way of community engagements to learn what's important for those neighborhood folks, what's missing, and what could potentially cause more harm than good. The public outreach must be better.

How accepting will they be about **redevelopment**? **Infill**?

What are their priorities? Are we acknowledging them?

What are their needs?

7. Has there been an effort at measuring **displacement, outward-migrations** of rural Clark County Citizens? What are the impacts on particular groups of people? If **rural displacement** has been occurring, how do you **mitigate** for that? Are we allowing strategies and opportunities tailored to the conditions that suit folks that live in Rural Communities? (i.e. equestrians, Apostolic Lutherans, avid gardeners, animal keepers. Clark County is distinguished as home to the **largest settlement of Old Apostolic Lutherans** in the entire country. This is a statement in the U. S. Census, quoted by Scott Bailey, Regional Economist.

Is Clark County acknowledging their culture and needs?

Is Clark County adequately accommodating their future generations of children?

8. Since 1995, most of north Clark County has been stuck in a **TIME CAPSULE** that consists of large lot zoning and a preponderance of close to 90% non-conforming parcels, that fail to match their zoned size. Over the course of 25 years, new generations of county rural citizens have been born and raised, practicing rural culture, carrying out their heritage. We want these children to have opportunities to carry on their lifestyle and be able to work, establish homes and raise their young families in the culture in which they were raised, if they choose.

Oliver Orjiako made a statement in a Councilor Work Session that kicked off the Buildable Lands Program, that said something like this;

*When children graduate and go away to college, if they can afford it, you want them to be able to return to the community where they grew up to work and live their lives.*

Certainly, that opportunity isn't exclusive to urban children. Clark County is long overdue for rural adjustments that recognize generations of rural children. The rural and resource communities need opportunities to re-zone and accommodate the natural growth of families that happens over time. 25 years, and potential 40 years is a long time to wait.

9. How is Clark County intending to accommodate rural children and plan for their future homes?

Rural families have been struggling for some time in finding affordable land for homes. Many have been forced to **out-migrate** to Lewis, Cowlitz, and even out of state searching for affordable land. GMA affordable housing applies to all sectors, rural and urban. **Displacement** and isn't an acceptable solution.

10. How will the committee ensure an equitable approach for housing for all current and future residents, and allow each local jurisdiction to include their specific housing needs that are also aligned with the jurisdiction's unique community character. Understanding individual local jurisdictions and the unique character of the areas they are serving is an important aspect of this work. Not all jurisdictions wish to be urban. For example, Yacolt has developed a unique rural character and is very different from Ridgefield. The character of each community should be respected, while still planning for future growth within their unique framework. That is mandated by the GMA in RCW 36.70A.215.

Sincerely,

Susan Rasmussen, President

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

Sent from [Mail](#) for Windows 10

**From:** [Carol Levanen](#)  
**To:** [Jose Alvarez](#)  
**Subject:** Fw: Vacant Buildable Lands process woefully inadequate - FOR THE PUBLIC RECORD  
**Date:** Thursday, April 30, 2020 9:28:14 PM

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**From:** Carol Levanen <cccuinc@yahoo.com>  
**To:** Eileen Quiring <eileen.quiring@clark.wa.gov>; kathleen.otto@clark.wa.gov <kathleen.otto@clark.wa.gov>; Gary Medvigy <gary.medvigy@clark.wa.gov>; John Blom <john.blom@clark.wa.gov>; julie.olson@clark.wa.gov <julie.olson2@clark.wa.gov>; Temple Lentz <temple.lentz@clark.wa.gov>; Mitch Nickolds <mitch.nickolds@clark.wa.gov>  
**Sent:** Thursday, April 30, 2020, 12:24:11 PM PDT  
**Subject:** Vacant Buildable Lands process woefully inadequate - FOR THE PUBLIC RECORD

FOR THE PUBIC RECORD

Dear Councilors,

The Clark County Buildable Land Project Advisory Committee will be convened via a virtual on-line meeting on May 1st, 2020. As Clark County Citizens United, Inc. reviews the data on-line for review, no response from ECONorthwest has addressed the comments and concerns of the Committee or the public comments. The report by the consulting firm appears to be simply reinforcing what staff did in the past, which isn't working. There is very little participation by the public, which would indicate the public outreach is woefully inadequate. One can count on their fingers, the number of comments that have been recorded by staff. The December 2019 meeting comments consisted of three comments from committee members, and none from the public. February 2020 meeting generated two comments from the committee members consisting of resource material, and various resource documents from one public member. March meeting generated two committee member comments and two public member comments. It appears that all of this activity is being done in a vacuum, with the consulting firm pushing it.

The county is over 60,000 units short of housing, of which 6,000 of those units are a minimum allowance for the rural areas, based on the illegal 90/10 housing split. At most, a realistic number of buildable lots in those areas, are no more than 3,000 parcels, according to the data taken from Clark County 1999-2000 documents as a baseline for buildable lands. With the changes to the GMA in 2017, the likelihood of that number being enough, is unlikely. So, this is what our \$150,000 of our tax dollars are paying for. Nothing.

According to the ECONorthwest contract with the county, in Resolution # 2019-07-06, it states, "

Line 22, page 1 - Whereas, RCW 36.70A.140 requires counties to conduct outreach to "establish and broadly disseminate to the public a public participation program identifying procedures providing early and continuous public participation in the development and amendment of Comprehensive land Use Plan and development regulations implementing such plans;

Line 26 page 1 - Whereas Clark County council after effective notice considered the Buildable Land Program Public Participation Plan,( Exhibit #1) at a duly advertised public hearing on July 16, 2019, .....

Exhibit A states in part, " will insure Clark County's buildable lands methodology complies with recent legislative changes prior to submitting the required Buildable Plan Report by the June 30, 2021 deadline.

A public participation Plan is a communication program that provides members of the public opportunity for early and continuous participation and to provide public access to key decision making processes with Clark County Council.

### **1.0 Public Participation Goals**

- ( ) Provide interested parties with timely information, and understanding of the process and opportunity to review and comment on proposed amendments to the buildable lands program reviews
- ( ) Actively solicit property owners and stakeholders about their concerns, questions and priority for the buildable lands program review process.
- ( ) Encourage interested parties to informally review and comment on proposed changes to the guidelines through out the process and provide those comments to decision makers.

### **2.0 Public Participation Opportunities**

Clark County is committed to providing multiple opportunities for public participation throughout the process. Clark County will use a variety of communication tools to inform the public and encourage their participation, including the following:

2.1 Website

2.2 Email distribution list

2.3 Media

2.4 Project Advisory committee - Clark County will appoint a project advisory committee to solicit public feedback on the buildable land program review.

2.5 Written comments

2.6 Public Comment and Hearings

3.0 List of Stakeholders - General public, environmental community business community Cowlitz Indian tribe, cities and state governmental agencies

Clark County is falling woefully short of active solicitation that enables "**early and continuous participation**" when only a hand full of the public is participating. This is regardless of all of the many communication tools Clark County claims to have

available in the "Opportunities".

In addition, the county is paying \$129,000 to another consulting firm to do the same thing, or is it to determine how high density can be pushed into our communities, without the taxpayers knowing about it? In all, the county is paying close to a half a million dollars to hoodwink the public.

It's time that more than one councilor participates in this event. Staff and consulting firms are advisory only and the Councilors are wholly responsible for adopted policies. Is this Council willing to allow rural lands to be ignored and short changed in this process? If so, let the public know that. If not, the councilors must be meaningfully involved in deciding where people will live in all of Clark County. They simply can't allow the story telling that comes from ECONorthwest, that results in business as usual as the outcome. This has been a critically inadequate process from the beginning, and needs to be changed to reflect the mandates in RCW 36.70A.215 of the Growth Management Act.

Sincerely,

Carol Levanen, Exec Secretary

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

**From:** [susan.rasmussen](#)  
**To:** [Jose Alvarez](#); [Gary Medvigy](#); [Eileen Quiring](#); [Julie Olson](#); [John Blom](#); [Temple Lentz](#); [Mitch Nickolds](#); [Kathleen Otto](#)  
**Subject:** Exclusion of Yacolt  
**Date:** Thursday, April 30, 2020 3:37:17 PM

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## FOR THE PUBLIC RECORD OF THE CLARK COUNTY BUILDABLE LANDS PROGRAM

There is a proposal before the Clark County Buildable Land Program Committee that all should know about if you're concerned about small towns and how future generations of rural families will be able to work and find affordable housing in north Clark County.

The proposed recommendation for the Clark County Buildable Land Program Update, May 1, 2020, states:

***Proposed Recommendation:*** *Continue to exclude Yacolt from urban capacity assumptions due to lack of sewer facilities. Do not exclude any additional land from the VBLM on the basis of infrastructure gaps.*

Before any advancement of this proposal takes place, the recommendation needs to specify what action authorizes county planning staff to make such a profound recommendation. After much research, CCCU is unable to find where Yacolt elected officials gave county staff discretion to make important growth decisions, spanning over 20 years, for the good citizens of Yacolt.

County planning staff should not have the ability to stretch their interpretations and exceed the limits of their authority, particularly in a formal setting where jurisdictions are competing for allocations of land designated for jobs, housing and densities. Yacolt is the only jurisdiction that is targeted for no growth over 20 years. Yacolt doesn't have a seat at this table. However, Yacolt does have the Chelatchie Prairie Railroad and the potential for associated jobs. The assumption is, Yacolt will not have a sewer so no new jobs and housing will be allocated over the next 20 years. An entire generation will be locked out. That is an amazing forecast coming from qualified professional staff.

CCCU has witnessed a trend of planning staff improperly assuming authority and power. That enables staff to influence the process and body of work that goes into policies made by the elected Board of Councilors. This is the exact opposite of what our citizens need --- a process that produces a body of work that is free from influence and does not allow the goals of one jurisdiction to be elevated above the others.

Thank you for your attention,  
Susan Rasmussen,  
Clark County Citizens United, Inc.

Sent from [Mail](#) for Windows 10

**From:** [Carol Levanen](#)  
**To:** [Eileen Quiring](#); [Gary Medvivy](#); [John Blom](#); [Julie Olson](#); [Temple Lentz](#); [Kathleen Otto](#); [Jose Alvarez](#); [Mitch Nickolds](#); [Jim Malinowski](#)  
**Subject:** Fw: Clark County Compliance to REW 36.70A.215 - FOR THE PUBLIC RECORD  
**Date:** Wednesday, March 25, 2020 5:32:29 PM

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Dear Councilors,

Clark County Citizens United, Inc. has been following the Vacant Buildable Lands Model process, and as the Committee holds it's meetings, the water is getting more and more muddy. It should be much simpler that that. Under RCW 36.70A.215, there is a basic process that must occur, before any other work can be completed. First, the county must evaluate eight items as to where, when and why land use activity has occurred. Data is to be collected over these eight items on an annual basis. Then from that data, a determination as to where appropriate jobs and housing should occur.

CCCU sees no such information being formulated in the VBL process and given to the Committee. The staff and consulting firm already have the cart before the horse, when they comment that what was done in 1994 worked and should be retained. That is simply not true. This committee should be given actual data that has been collected for all of these eight mandates. Then discussions can take place. This is simply not happening, making the county non-compliant to the RCW and state law. There is a PROCESS that is required in the GMA, and the county cannot continue "business as usual". The law also says they must show their work, and these eight items are a critical first step to that process.

Sincerrely,

Carol Levanen, Exec. Secretary

Clark County Citizens United, Inc. P.O. Box 2188 Battle Ground, Washington 98604  
E-Mail [cccuinc@yahoo.com](mailto:cccuinc@yahoo.com)

## RCW 36.70A.215

(2) The review and evaluation program **shall**:

1. (a) Encompass (include comprehensively) **land uses** and **activities** both **within** and **outside** of urban growth areas and
2. provide for **annual collection of data** on **urban** and **rural** land uses,
3. **development**,

4. **zoning** and
  5. **development standards**,
  6. **environmental regulations** including but not limited to critical areas, stormwater, shoreline, and
  7. **tree retention requirements**; and
  8. **capital facilities**
- to determine** the quantity and type of **land suitable for development**, both for **residential** and **employment**-based activities;