

From: [Sonja Wiser](#)
To: CHARLES RUDKIN Owner
Cc: [Oliver Orjiako](#); [Jacqui Kamp](#); [Jenna Kay](#); [Jose Alvarez](#); [Bart Catching](#)
Subject: RE: Changes to the comprehensive growth plan
Date: Tuesday, February 7, 2023 9:16:00 AM
Attachments: [Comprehensive plan review 2"2022 There is a serious disconnect between the current Clark County.docx](#)

Charles, thank you for your email and correspondence. Your correspondence will be forwarded to staff and added to the 2025 Comp Plan Index of Record. I have also added your name to our database to receive future communications on the Comp Plan. Thanks again

From: CHARLES RUDKIN Owner <cprbr@centurylink.net>
Sent: Tuesday, February 7, 2023 9:13 AM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Cc: Sonja Wiser <Sonja.Wiser@clark.wa.gov>; kimh@rightline.com
Subject: RE: Changes to the comprehensive growth plan

Thank you for your prompt response Oliver. Please see the attached report for inclusion into the record.

Charles Rudkin

11204 NE 53rd Ct.

Vancouver, Wa. 98686

360 921-6293

On Tue, 7 Feb, 2023 at 8:28 AM, Oliver Orjiako <Oliver.Orjiako@clark.wa.gov> wrote:

To: charles rudkin owner
Cc: Sonja.Wiser@clark.wa.gov

Good morning Chuck:

Thank you for your email and inquiry. You can submit your comment to Ms. Sonja Wise and it will be included in the index of record. I am cc Sonja in my reply to you. Thanks.

Oliver

From: CHARLES RUDKIN Owner <cprbr@centurylink.net>
Sent: Tuesday, February 7, 2023 4:33 AM
To: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: Changes to the comprehensive growth plan

CAUTION: This email originated from outside of Clark County. Do not click links or open attachments unless you

Clark County 2023 Comprehensive Growth Plan review.

There is a serious disconnect between the current Clark County 20 year comprehensive growth plan and the county code intended to service it with regards to housing density. In my opinion, the 'plan' should be a reliable footprint and guide for future growth in the county. But without specific code to enforce the purposes stated in the plan, execution of the plan is subject to interpretation.

In order to correct this flaw, Clark County Code CCC 40.220.010-1 should state that the purpose of cottage housing in CCC 40.260.073 "Must be considered cause for denial of an applicants proposal"!

Specifically, the 'plan' applies the state mandate for housing density in a way to maintain the quality of existing neighborhoods:

On page 24 of the 20 Year Growth Management Comprehensive plan it says "ensure that infill development enhances the existing community character and fits with the character of the existing neighborhood". Again on page 43 it states that density increase should continue to protect the character of the existing area. These conditions are reiterated in CCC for Cottage Housing (Code 40.260.073): The purpose is to [#6]. "To maintain the character of existing residential neighborhoods and ensure compatibility between cottage developments and their neighbors."

Pg.66 Neighborhood Character and Vitality:

Clark County's residential neighborhoods vary in size, density, housing type and amenities. The character of a neighborhood, both its livability and identity, is closely associated with its design, the characteristics of the residents and the services provided. Regardless of the character of the neighborhood, residents generally want a feeling of comfort and security, privacy and a sense of belonging. Neighborhood character is an important element of the Community Framework Plan and is a central component of an approach that encourages a hierarchy of well-defined places. Over the next 20 years, preservation of existing neighborhoods will require a conscious acknowledgment of the existing nature of the people, visual character and services. New development in previously undeveloped areas should occur with an identifiable visual and service character. **Infill development should occur with a visual and service character compatible with existing development.**

In order to achieve the goals of the 20-Year Plan, Clark County and other jurisdictions must encourage the use of infill parcels for homes and also must ensure that development is compatible (without conflict) with the surrounding neighborhood.

In the case of "50th Avenue Cottages, 2021, (Case number CLD-2021-00182) the examiner stated that the code is not approval criteria. He further stated that the proposed development will change the character of the neighborhood, considering that the average size lot in the 114th street existing neighborhood is 37,667 sq. ft., the smallest is 7,977, and The average size of the cottage lots is 2,237 sq. ft. **All objections were disregarded, and the project was approved.**

Clark County Code CCC 40.220.010-1 states that cottages are “allowed” in R1-6 zoned parcels: “Uses According to Table 40.220.010-1, Cottage Housing is permitted outright in the R1-6 zone,...” **Except for conditions in Special Uses Standards put forth in Section 40.260.073**, but there are no stipulations, conditions, or circumstances in this portion of the code that would guide the examiner in making a decision to allow or deny specific cottage developments. RCW 58.17.110 give some guidance, The term “allowed” is not a mandate or requirement to approve cottage development in all cases. This ambiguous condition should force examination of the proposal to look to CCC 40.260.073 Cottage Housing for such guidance.

Clark County Code CCC 40.220.010-1 should state that the purpose of cottage housing in CCC 40.260.073, including article #6 “Must be considered cause for denial of an applicants proposal”.

Charles Rudkin
11204 NE 53rd Ct.
Vancouver, Wa. 98686
360 921-6293
CPRBR@CENTURYLINK.NET

recognize the sender and know the content is safe.

I realize that time is of the essence for making comment on updates to the plan, but I would like to submit a comment. How can I send a written document for the record?

Thanks,

Chuck Rudkin