

cc'd = S. Orjiako
J. Alvarez
S. Wisser

Rebecca Messinger

From: Kathleen Otto
Sent: Tuesday, August 9, 2022 1:43 PM
To: Rebecca Messinger; Tina Redline
Subject: FW: Fw Reckless failure and abandonment of public policy



Kathleen Otto
County Manager

564.397.2458



From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Sent: Tuesday, August 9, 2022 1:42 PM
To: Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Richard Rylander <Richard.Rylander@clark.wa.gov>; Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Julie Olson <Julie.Olson2@clark.wa.gov>; Temple Lentz <Temple.Lentz@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>
Subject: Fw: Fw Reckless failure and abandonment of public policy

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Clark County Council
P.O. Box 5000
Vancouver, Washington 98666

August 9, 2022

FOR THE PUBLIC RECORD

Dear Councilors,

Clark County Citizens United, Inc. is a 501-c4 non-profit organization who has followed and contributed to the Clark County Comprehensive Land Use Plan, since 1994. Our mission is to assure rural land use policies are acceptable to the rural population, as we endorse reasonable and fair regulations.

In 1997 and again in 1999 CCCU won in the Superior Court and Court of Appeals Div. II, Published Opinion, that affirmed the county used an illegal formula and process to compose the Plan. Clark County has simply ignored those court rulings, as the housing shortage throughout the county becomes critical and too expensive to afford. The citizens of Clark County must get both rural and urban housing relief, and compliance to those court orders can make that happen.

Once the appropriate population allocations were deliberated and approved in a public policy, it was not appropriate to divert and move that allocated population of people into a different jurisdiction. The act of targeting and reallocating a settled population of people out of one jurisdiction into another appears to be illegal according to elements of **WAC 365-196-325**. Moving people out of their familiar culture and social structure without any social and economic analysis is reckless. This is when "re-allocation" becomes an act of "displacement."

WAC 365-196-325 (2)(a) Determining land capacity sufficiency. *The land capacity analysis is a comparison between the collective effects of all development regulations operating on development and the assumed densities established in the land use element. In order to achieve sufficiency, the development regulations must allow at least the low end of the range of assumed densities established in the land use element. This assures a city or **county can meet its obligation to accommodate the growth allocated through the countywide population allocation process.***

(b) Appropriate area for analysis. *The focus of the analysis is on the county or city's ability to meet its obligation to accommodate the growth allocated through the **county-wide population or employment allocation process.***

The 2007 Amended Buildable Lands Report shows a rural parcel deficiency looming in the 2024 planning horizon. This means the county will soon be unable to house their rural population because buildable rural lots will be used at full capacity. Even though the county is aware of this housing shortage, the county spent over \$200,000 for consultants, ECONorthwest, to review that BLR, in 2020-21, resulting in a "do-nothing" recommendation. The BLR was then forwarded to Washington State Department of Commerce for their approval. That report was just "story telling" to justify a long held 1994 planning strategy, to eventually prevent all growth in the rural and resource areas.

This fact is recognized in the 2007 data.

This fact creates a huge, expected shortage that impacts thousands of unhoused rural families.

This fact, resulted in thousands of unhoused rural families remaining unfilled for many years.

The county has a long standing formal population allocation housing policy, it has not attempted to fill. CCCU's membership recognizes such housing restrictions not only thwart several public policy issues, but broadly fragments social structures young families depend on. Any resolution that reconciles rural housing to the rural population allocation has complicated strings. The possibility of dismantling obstacles in the county's comprehensive plan to better suit the needs of a culture of people, can discourage planners from seeking the will and the funding to do essential work. However, an intentional displacement and diversion of populations of people that have been allocated in formal public policy, is the wrong and illegal solution. The county must change course to assure that all citizens in Clark County have a fair and equitable chance of obtaining a variety of affordable housing in both rural and urban areas.

Sincerely,

Susan Rasmussen, President

Clark County Citizens United, Inc.
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Battle Ground, Washington 98604