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Rebecca Messinger

From: Kathleen Otto
Sent: Thursday, June 15, 2023 6:08 PM
To: Rebecca Messinger; Tina Redline
Subject: FW: CPZ2022-00015 Countywide Planning Policy Amendment Procedures



Kathleen Otto
County Manager

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From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Sent: Thursday, June 15, 2023 3:16 PM
To: Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>
Subject: CPZ2022-00015 Countywide Planning Policy Amendment Procedures

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

June 15, 2023

FOR THE PUBLIC RECORD TO THE CLARK COUNTY COMPREHENSIVE PLAN

Dear Councilors,

Clark County Citizens United, Inc. believes that Clark County has never been compliant to the Washington State Growth Management Act as it pertains to areas outside the urban growth boundaries. The GMA with its RCWs clearly state in many passages, too numerous to mention, that the county is to conduct a county wide planning policy. Does that policy mean the rural areas are to be left out and only the urban areas planned for growth. That is not what the law says.

[36.70A.010](#) << [36.70A.011](#) >> [36.70A.020](#)

Findings—Rural lands.

The legislature finds that this chapter is intended to recognize the importance of rural lands and rural character to Washington's economy, its people, and its environment, while respecting regional differences. Rural lands and rural-based economies enhance the economic desirability of the state, help to preserve traditional economic activities, and contribute to the state's overall quality of life.

The legislature finds that to retain and enhance the job base in rural areas, rural counties must have flexibility to create opportunities for business development. Further, the legislature finds that rural counties must have the flexibility to retain existing businesses and allow them to expand. The legislature recognizes that not all business developments in rural counties require an urban level of services; and that many businesses in rural areas fit within the definition of rural character identified by the local planning unit.

*Finally, the legislature finds that in defining its rural element under RCW **36.70A.070(5)**, a county should foster land use patterns and develop a local vision of rural character that will: Help preserve rural-based economies and traditional rural lifestyles; encourage the economic prosperity of rural residents; foster opportunities for small-scale, rural-based employment and self-employment; permit the operation of rural-based agricultural, commercial, recreational, and tourist businesses that are consistent with existing and planned land use patterns; be compatible with the use of the land by wildlife and for fish and wildlife habitat; foster the private stewardship of the land and preservation of open space; and enhance the rural sense of community and quality of life*

In the county's own documents regarding Countywide Planning, it clearly says the county will be planning for both urban and rural areas, each one using different criteria. But that's not happening. For some reason, there has been a local misinterpretation of the GMA to mean that counties are to only plan for urban growth, and that is not what the GMA says. In fact, many entries in the RCWs explain what and how to plan for in the rural area, so why isn't Clark County doing that?

Even in the proposed Amendments, its text opens with what the law says, but then the rest of the document goes askew. Regarding, **CPZ2022-00015 Countywide Planning Policy Amendment Procedures**.

10 Chapter 1 Land Use Element

11

12 1.1 Countywide Planning Policies

13 1.1.1 Clark County, municipalities and special districts will work together to establish urban
14 growth areas within which urban growth shall be encouraged and outside of which growth
15 may occur only if it is not urban in nature. Each municipality within Clark County shall be

What this says is that Clark County is to plan for both inside and outside the urban growth areas throughout the county, countywide and not only in urban areas. It reiterates these words in the following text, so why does the public not see this happening?

16 *included within an urban growth area. An urban growth area may include territory located*

17 *outside of a city if such territory is characterized by urban growth or is adjacent to areas*
18 *characterized by urban growth.*

19 *1.1.2 The County and relevant jurisdictions will consult with the Cowlitz Indian Tribe where*
20 *urban growth areas are adjacent to the boundary of the Cowlitz Indian Reservation in*
21 *order to assure that policies developed in compliance with Chapter 36.70A accommodate*
22 *the Tribe's and relevant jurisdictions' future growth needs. "Relevant jurisdictions" are*
23 *defined as those adjacent to and/or affected by the Cowlitz Indian Tribe Reservation.*

24 ***1.1.3 Urban growth areas shall include areas and densities sufficient to permit the urban growth***

25 *that is projected to occur in Clark County for the succeeding 20-year period.*

26 *1.1.4 Urban growth shall be located primarily in areas already characterized by urban growth*
27 *that have existing public facility and service capacities to adequately serve such*
28 *development and second in areas already characterized by urban growth that will be*
29 *served by a combination of both existing public facilities and services that are provided by*
30 *either public or private sources. Urban governmental services shall be provided in urban*
31 *areas. **These services may also be provided in rural areas, but only at levels appropriate***
32 ***to serve rural development.*** *Urban governmental services include those services*
33 *historically and typically delivered by cities or special districts and include storm and*
34 *sanitary sewer systems, domestic water systems, street cleaning services, fire and police*
35 *protection, public transit services and other public utilities not normally associated with*
36 *non-urban areas.*

In the upcoming Amendments to the Clark County Comprehensive Plan, CCCU expects to see accurate and meaningful countywide planning that includes all of Clark County, including all of the rural areas. Such planning is mandated in the RCWs and WACs of the Growth Management Act.

Sincerely,

Carol Levanen, Exec. Secretary

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