

**From:** [Kathleen Otto](#)  
**To:** [Rebecca Messinger](#)  
**Subject:** FW: Collapse of rural parcels in the 2007 Amended B.L.R. should be in the record  
**Date:** Wednesday, April 17, 2024 9:09:23 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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**Kathleen Otto**  
County Manager

564.397.2458



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**From:** Clark County Citizens United, Inc. <cccuinc@yahoo.com>  
**Sent:** Wednesday, April 17, 2024 8:57 AM  
**To:** Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Karen Bowerman <Karen.Bowerman@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:** Fw: Collapse of rural parcels in the 2007 Amended B.L.R. should be in the record

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Clark County Council April 17, 2024  
P.O. Box 5000

Vancouver, Washington 98666

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN

**Re: Collapse of rural parcels in the 2007 Amended B.L.R. should be in the record**

Dear Councilors,

Clark County Citizens United, Inc. is a 501-c4 non-profit organization who has followed and contributed to the county's 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, fair, equitable and affordable housing for all people.

In 1997 and 1999, Clark County Citizens United, Inc. won in the Superior Court and Court of Appeals Div. II, Published Opinion, that affirmed the county used an illegal formula and public process, to write the county's first comprehensive plan. The Courts ruled, the county cannot put a cap, (limitation), on rural growth. Clark County has ignored those court rulings, as the housing shortage throughout the county becomes critical and unaffordable for many families. The citizens of Clark County are deserving of both rural and urban housing relief. Compliance to those court orders can make great strides to make that happen.

Once population allocations were deliberated, approved and adopted in a public policy, it was not appropriate to divert and move the allocated rural population of people into a different jurisdiction. The act of targeting and reallocating a settled population of people out of the rural jurisdiction into another appears to be illegal according to elements of WAC 365-196-325. Displacing people by moving them out of their familiar culture and social structure without any social and economic analysis is reckless. This causes “reallocation” to become an act of “displacement.” The **2007 Amended Buildable Lands Report shows the county took this extreme action when it became evident there was a looming rural parcel collapse showing in the 2024 planning horizon. The rural population allocation was moved to another jurisdiction to reconcile the rural housing deficiency.**

#### **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 collapse looming in the 2024 planning horizon.** This means the county will be unable to house their adopted rural population allocation because buildable rural lots will be used at full capacity.

County planners have been aware of this rural housing collapse.

It’s hard to ignore the factual data in the **2007 Amended B.L.R.**

- **Various Issue Reports contain no discussion of the anticipated rural housing deficiency looming in the 2024 horizon.**
- **The current BLR shows the rural areas failed to meet the 10% adopted rural population allotment and rural growth staggered at less than 1%.**
- **Even though this is a massive public policy failure, there has been no analysis of impacts to rural families from this rural parcel deficiency, rural housing collapse and affordability, impacts to a culture of people, and no discussion on ways to make corrections.**
- **The county has never had a public policy, supported by a formal public process, to reallocate and displace rural populations of people from their communities.**

The 2007 reallocation of rural citizens resulted in thousands of unhoused rural

families being displaced from their familiar communities. Before any public policy is set about the 95%/5% new urban/rural population allocation, all historical data needs to be present at the table for review and analysis. The rural parcel collapse and resulting rural population displacement will be evident. The question needs to be asked; *Will the new allocation continue to drive rural family displacements? Is that the policy coming forward?*

It's highly likely, the 95/5% population allocation will fragment rural social structures young families depend on. Public policy should reconcile rural housing to the actual needs of the present and future rural populations. An intentional displacement and diversion of rural populations of county people, that have been allocated in a very formal public policy, is wrong, illegal and fails to lead to a workable housing solution. The county must change course to assure that all citizens 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.  
P.O. Box 2188  
Battle Ground, Washington 98604