

From: [Kathleen Otto](#)
To: [Rebecca Messinger](#)
Subject: FW: Buildable Lands Report Ignores the Facts
Date: Wednesday, April 17, 2024 6:54:07 PM
Attachments: [image001.png](#)
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[image003.png](#)
[image004.png](#)



Kathleen Otto
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From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Sent: Wednesday, April 17, 2024 9:20 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: Buildable Lands Report Ignores the Facts

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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: Buildable Lands Report Ignores the Facts

Dear Councilors,

Clark County Citizens United, Inc. believes it does not make sense that amidst *countywide* affordable housing and supply issues, staff would remove a source of buildable land for housing. It appears staff is beholden to advancing a certain agenda and is only presenting one side of a multi-faceted issue that is not limited to one UGA's housing situation. In doing this, they are completely ignoring the devastating impacts that breaching the 10% rural population allocation would have on the good families of the rural areas. It also appears they're trying to use conservation and environmental issues to prop up and advantage one particular housing agenda, (2021 Clark County BLR, Pg.

Not only is the 2021 Buildable Lands Report tainted with bias, but it completely omits narratives in past reports that warn of pending issues. Historical reports should be used as tools used to detect trends that have contributed to the current housing conditions. In this regard, omissions from the 2022 BLR may be just as noteworthy as

the particular content that was chosen to be included. This is an element of bias.

The BLR report ignores several multi-year studies implemented to test how well the comprehensive growth plan was working at holding to growth policies. One report, the **Clark County Plan Monitoring Report, 1995-1999**; Pg. 40, has a warning about unaffordable rural housing;

“There was very little opportunity for home ownership in a more rural setting for households achieving the median income. . .Rural housing opportunities are generally well beyond the median income household’s ability to purchase.”

The **Buildable Lands Report, August 2007** (Amended), Pg. 41, has language indicating that breaching the 10% rural population allocation was indicated.

Buildable Land Needs & Capacity Analysis:

*“Based on the August 14, 2007 plan map inventory of vacant and buildable land there are 8,857 net buildable acres. At a potential of 7.5 dwelling units per acre and 2.59 persons per household, this land area will accommodate 173,372 persons. This includes all the City of Vancouver. . .and small lots estimates **and with the ten percent rural population allocation (19,262)** the total comes to 200,500 new people. . . With implementation of the cities reasonable measures and other planned development there may be sufficient capacity to accommodate the projected 2024 population.”*

*Pg. 47: Given the underlying zoning, the total vacant and Development potential in the rural area is approximately 7,387 lots. Assuming 2.59 persons per household, there is capacity to add **19,132 persons in the rural areas.***

The 2007 BLR fails to be specific in dealing with the 10% rural growth policy. The rural capacity may be able to add 19,132

persons over the 2024 planning horizon, but fails the allocated growth of 19,262 rural persons. The real story, detected in the numbers, is that there is a pending collapse of rural parcels that are required to meet the rural housing demands set in the 2004

Comprehensive Plan population allocation. The rural housing collapse looms in the 2024 planning horizon of the 2004 Plan.

A fatal flaw appeared in the 2004 Comprehensive Plan that would further strain unaffordable rural housing. What's more, the cap on rural growth, (per Judge Poyfair's ruling), is squarely evident in the data, (BLR, August 2007 (Amended) Summary, P.47).

The Year of Reckoning, 2024

Just think about this. The 2004 Plan was required to show 20 years of housing to the 2024 planning horizon. By 2007, (planners knew the County's supply of rural land would fail to meet critical rural housing demand. All the while, rural families did what families do best and raise their young. Additionally, the county was purchasing untold acres of rural land, (Legacy & Park Lands) intended for housing to serve rural families. The county's own actions have further undermined rural housing supplies and affordability. An inevitable collapse of rural housing was glaring out in the August, 2007 (Amended) Buildable Lands Report.

The Fatal Choice of 2007

The flaw in the Plan couldn't be ignored. The administrators were face to face with a choice; either make the number of rural people conform to the exhausted number of rural parcels, **or**, adjust and adapt the number of rural parcels to suit the growing needs of the rural people. Rather than admit noncompliance to court directives and remedy the Plan, the administrators chose to harness the will of thousands of rural families and force displacement.

The question isn't weather rural parcel and housing numbers should have been adapting to accommodate the increasing numbers of people, but rather how it was done. No studies of the potential consequences, disruptions and displacements. The 10% rural growth failure is as much a social political story as it is a social engineering study using land use zoning laws as a powerful tool. It's not just about managing rural land. It's about controlling the housing resource for a certain population of people. The rural areas are reimagined and remade to conform to another vision.

Their fateful decision has systematically capped rural growth; directly contradicting compliance to court orders. When various county reports are viewed collectively, a trend is evident. Beginning in 1995-2000, rural shared 18.9% of countywide growth. That growth proceeded on a downward trajectory 14%, -2.9%, 11%, down to less than **1% of countywide growth by 2021**, (2021 Clark County Buildable Lands Report, Figure 2, Population Growth 2016-2020).

Declining Rural Percentage of Countywide Growth

1%. . +794 rural people, 2016-2020, 2021 Clark County BLR

11%. . +3,797 rural people, 2007-2014, 2015 Clark County BLR

-2.9%. . -1,817 rural people, 2004-2008, 2009 C. C. Plan Monitoring Report

14%. . .+4,645 rural people, 2000-2004 C. C. Plan Monitoring Report

18.9%. +10,186 rural people, 1995-2000, C.C. Plan Monitoring Report

Without doubt, the collapse of rural housing, appearing in the 2007 BLR, placed undue burdens on rural families, their housing, economies and culture. Those families began declining long before the 2016 Comprehensive Plan update. The administrators have quite literally forced displacement of untold numbers of families by intentionally driving unaffordable rural housing. Steps have never been taken to restore and protect rural housing numbers. The stressors and challenges those families have faced result in a myriad of issues.

All the while, the county has mounted lobbying campaigns supported by a disingenuous perspective. They should be rejected for bias. All BLRs create illusions of an abundance of buildable rural parcels. But the declining rate of the rural population reveal a different story. Even though rural housing issues were evident in the first Clark County Plan Monitoring Report, 2000, no reports are brought forward concerning the eminent housing and population collapse. The data shows they have made no clear and significant progress on stopping the displacement of rural families.

CCCU asks the Council to look at the data, recognized established trends and listen to the rural families.

Reference Materials

Clark County Plan Monitoring Report (1995-1999)

Clark County Plan Monitoring Report (2000-2004)

Clark County Buildable Lands Report, August 2007 (Amended)

Clark County Buildable Lands Report, June, 2015

Clark County Comprehensive Growth Management Plan Implementation 2009 Monitoring Report

Clark County Buildable Lands Report, Draft, February 15, 2022

Wa. State Department of Health Office of Community Health Systems Series on Rural-Urban Disparities, FACT SHEET, February, 2017

CCCU's court actions beginning with the Poyfair Remand. . .

Sincerely,

Susan Rasmussen, President
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