

**From:** [Kathleen Otto](#)  
**To:** [Rebecca Messinger](#)  
**Subject:** FW: Rural Land Assumptions must be part of the Comprehensive Plan 2025  
**Date:** Wednesday, May 15, 2024 7:22:14 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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**Kathleen Otto**  
County Manager

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**From:** Clark County Citizens United, Inc. <cccuinc@yahoo.com>  
**Sent:** Tuesday, May 14, 2024 9:37 PM  
**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>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>  
**Subject:** Rural Land Assumptions must be part of the Comprehensive Plan 2025

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

May 14, 2025

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN

**Re: Rural Land Assumptions must be part of the Comprehensive Plan 2025**

Dear Councilors,

Clark County Citizens United Inc. sees many passages in the Growth Management Act, WACs and associated documents pertaining to county wide planning for growth. It states the cities plan for the cities and the county plans for everything outside the cities' jurisdiction. Those documents also state the definition of rural is everything outside the unincorporated

urban growth boundary. This makes clear the county is responsible for planning housing and growth in all rural and resource areas, making up the rest of the county outside the cities. For some reason, planners have left that planning phase out, and there is no mention of how they are planning for a variety of housing and jobs for rural areas, in the current GMA planning documents. Such planning has got to happen.

Rural assumptions should be used to reasonably plan for what is likely, not what is possible. Parcels that cannot reasonably be expected to develop should not be counted as parcels likely to develop. Cluster development remainder parcels that are known to be prohibited from further development should not be counted as parcels likely to develop.

Rural parcels located in areas far from infrastructure with long term commercial forestry operations likely to continue, should not be counted as likely to develop. Assumptions are not used to authorize or to prohibit the development of individual parcels, and should only be used for tallying parcel totals for general planning information.

Rural parcels that have less than one acre of environmentally constrained land with insufficient area for septic systems and well clearances, should not be counted as likely to develop.

History shows that about 30% of dividable parcels with homes and 10% of vacant dividable parcels do not develop further. So those deductions have been applied to urban planning totals for years. These same deductions should be applied to rural planning totals as well.

Due to some exceptions from the norm, 10% of nonconforming parcels with at least one acre of unconstrained area will likely develop.

A 7.5% rural market factor should be used to provide a reasonable margin for the law of supply and demand, to comply with the GMA. It requires a sufficient supply and an affordable housing goal. Implementation of this rural market factor is accomplished by deducting the percentage of parcels from the total available rural parcels. This rural market factor is half of the urban market factor of 15%, in order to also satisfy the GMA goal of reducing low density sprawl.

The actual urban/rural split has consistently been 86/14 for decades and is a viable policy option. The 1994 approved Plan used 80/20. A more moderate policy of 87.5/12.5 should be used for this update.

New updated maps would include mitigations that increase the variety of lot sizes, including Ag-20, preserve large parcels near the UGBs for future employment and better preserve the rural character. These revisions and planning assumptions should be allowed.

Rural cluster options are to be integrated into the Plan, for all rural zones. Based on a 5 acre density within the limits of the law, to provide flexibility, preserve open space, and to better provide for larger aggregated areas of habitat.

An updated map should correct the mismatch between the existing map and the already developed patterns of growth that actually exist. This would respect predominate lot sizes, resolve some spot zoning problems, and best accommodate the forecasted populations as a countywide Comprehensive Plan is implemented according to the mandates of the GMA.

Sincerely,

Carol Levanen, Exec. Secretary

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