

**From:** [Jeffrey Delapena](#)  
**To:** [Clark County Citizens United, Inc.](#); [Cnty 2025 Comp Plan](#); [Bart Catching](#); [Jose Alvarez](#); [Oliver Orjiako](#)  
**Cc:** [Rebecca Messinger](#)  
**Subject:** RE: CCCU Request Changes to 2025 Clark County Comprehensive Land Use Plan  
**Date:** Monday, November 24, 2025 8:08:53 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Good day, Carol,

Thank you for submitting this feedback in relation to the 2025 Comprehensive Plan Update.

This will be entered into the Index of Record.

Best,



**Jeff Delapena**  
Program Assistant  
COMMUNITY PLANNING

564.397.4558



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**From:** Clark County Citizens United, Inc. <cccuinc@yahoo.com>  
**Sent:** Friday, November 21, 2025 6:35 PM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Bart Catching <Bart.Catching@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>  
**Subject:** Re: CCCU Request Changes to 2025 Clark County Comprehensive Land Use Plan

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Clark County Council  
2025  
Community Development  
P.O. Box 5000  
Vancouver, Washington 98666

November 21,

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN

**Re: CCCU Request Changes to 2025 Clark County Comprehensive Land Use Plan**

Clark County Citizens United, Inc., a 501c4 non-profit representing approximately 6000 rural landowners, believes the following recommendations for changes to the update of the Comprehensive Plan are necessary to correct mistakes that were made in the past. CCCU believes the changes are necessary to enhance the rural and resource areas in the future. These changes will remove heavy financial burdens for the landowners and the county, while enhancing the economic viability and affordable housing for Clark County's rural and resource communities. In addition, these changes will add and create an abundance of agriculture and forest lands that is economically feasible and allows landowners to live on the land and provide a product used by the consumer, far into the future.

- 1. SEPARATE - Resource Element and Rural Element in the EIS, Comprehensive Plan and the OFM population projections. For those lands that are outside the urban growth area, establish their own population projection.**
- 2. CORRECT - all resource soils maps to reflect only Class I and Class II Prime and Unique soils**
  - a. Mandatory use of USDA NRCS 1972 Soils Manual and maps.
- 3. RECOGNIZE - existing parcelization in all rural and resource zones.**
  - a. Zone parcel size according to predominant lot size within each section.
- 4. AGRICULTURE SOILS - to be zoned 5 and 10 acres.**
  - a. This includes: Class I-II Cloquato, Newberg, Hillsboro and Class II - Sauvie, Hesson, Olumpic, McBee Simiahmoo, and Tisch.
  - b. Cluster one acre lots based on 5 acre density or simple 5 acre segregation
  - c. Use GMA statutory mandated definitional criteria for all resource lands
- 5. FOREST SOILS - to be zoned 5, 10 and 20 acres.** This includes: Cinebar
  - a. Cluster one acre lots based on 5 acre or simple 5 acre segregation.
- 6. RURAL ZONES - 5 acres for all remaining land not in a resource soil zone.**
  - a. Cluster one acre lots based on 2.5 acre density
- 7. ALLOW 2-4 units per acre noted in the Framework Plan for Rural Centers.**
- 8. SHORT PLAT ORDINANCE**

- a. Reduce fee costs - more user friendly - certain criteria such as steep slopes, critical land wetland, etc. only applied with an application for a building permit process
- b. remove pre-application conference - (not required in the GMA)
- c. application process help - no charge
- d. In 2010 the GMA changed to direct counties to have a citizens help committee to aid applicants through the process
- e. Only the development application and final plat review is necessary
- f. Allow 90 days for appeal (GMA recommends this)
- g. Remove criteria for potable water - should be tied to building permit process
- h. Remove criteria for road construction – should be tied to building permit process
  - i. Survey/engineering information

## **9. SIMPLE SEGREGATION**

- a. Used for lands 5 acres or more being used for resource for 5 years with renewal in 5 year increments.
- b. Only survey and traffic safety issues addressed. When converted to development, other requirements required for building permit.

## **10. ELIMINATE REDUNDANT REVIEW**

- a. Previous development reviews must be used for all new development reviews and permits on the same property or parent property.

## **11. HOME BUSINESS ORDINANCE**

- a. Replace the ordinance with a Clark County Rural Business License Fee, similar to Vancouver, Battle Ground, and other cities license fees.
- b. License includes name, type of business, UBI number, require license and bonding, number of employees, business hours, road maintenance agreement, if on private road, notice to adjacent landowners, address problems and buffer, if necessary, narrative of business activity.

## **12. HABITAT ORDINANCE**

- a. Reduce buffer size to no net loss of existing functions and values.
- b. Buffers only required where scientific data shows a buffer needs to be in place.
- c. Allow normal maintenance and access consistent with the habitat
- d. Allow at will hazard tree removal and not subject to a county review.
- e. Allow harvesting of all DNR recognized tree species under DNR permit process
- f. Allow farm ponds, and landscape that creates new functions and values.
- g. Mitigation to be at least 30 to 100 feet from the development for fire suppression.

## **13. WETLAND ORDINANCE**

- a. Reduce setbacks according to impact, using accurate scientific data on a graduated scale to the impact.
- b. County to prove wetland soils using the DOE state and federal guidelines of three required criteria – predominant wetland soil, predominant wetland plants and predominant water.

## **14 REMOVE MANDATORY COVENANT**

- a. All covenants must be voluntary, with the length of time being determined by the

impact of the project.

b. The exception would be any Super Cleanup site.

c. Must only apply to the actual development site and not affect the entire deed.

**15. COHOP ORDINANCE** – Remove it from the regulations. It is not necessary.

Sincerely,

Carol Levanen, on behalf of the Membership

Clark County Citizens United, Inc.

P.O. Box 2188

Battle Ground, Washington 98604

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