From:	Cnty 2025 Comp Plan
To:	"Clark County Citizens United, Inc."; Cnty 2025 Comp Plan; Jose Alvarez; Jeffrey Delapena; Oliver Orjiako
Subject:	RE: The FEIS lack of adequate rural land for housing shows a troubling legacy
Date:	Monday, August 17, 2026 2:27:00 PM
Attachments:	image001.png image002.png image003.png image004.png

Good day, Susan,

Thank you for submitting CCCU's comments regarding the Final Environmental Impact Statement of the 2025 Comprehensive Plan.

These will be added to the Comprehensive Plan Index of Record.

Best regards,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

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From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Sent: Friday, August 14, 2026 9:40 PM
To: Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Matt Little <Matt.Little@clark.wa.gov>; Wil Fuentes <Wil.Fuentes@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>
Subject: The FEIS lack of adequate rural land for housing shows a troubling legacy

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Clark County Council August 14, 2026
Clark County Planning Commission
Clark County Community Development
P.O. Box 5000
Vancouver, Washington 98666

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN UPDATE FEIS

Re: The FEIS lack of adequate rural land for housing shows a troubling legacy

Dear Councilors, Commissioners and Staff,

Clark County Citizens United, Inc. (CCCU) with approximately 6,000 members, believes when taxpayers read their Clark County property tax bill, it becomes clear that owning a home and property means paying a share of government provided services, along with services for the good of the whole. Public Works funding meant to support parks, Conservation Futures Legacy Lands and conservation has become staggeringly expensive, with little public benefit, as the land is taken off the tax rolls.

While the programs claim to add livability to the region, they fail to support the area's housing affordability crises. Approximately 5,600 acres of land is under county Legacy Land and conservation programs and generates no tax income. Tax dollars are used to purchase land, easements and management of these programs. Once those acres fall under agency ownership, those former taxes get redistributed amongst the rest of the private land that remains.

Most of us want clean air, water, environmental protection, good roads and parks. The question for elected officials is, at what cost to the taxpayers and rural communities? Expansions of thousands of acres of riparian areas and buffers consume much private land. Additionally, the county has been demanding permanent conservation covenants recorded on deeds of those private properties. It is estimated that a riparian zone of 150' on 1 mile of stream bank is equivalent to removing 18 acres of land and giving it to the county. These permanent conservation covenants consume the entire property. Approximately 83,561 acres of land are owned and managed by public agencies and non-profits. 13,012 acres are supposed to be for local parks under Clark County's Legacy Lands

and Conservation programs, but is that actually happening.

The tax impacts of agency owned land add "fuel to the fire" of the housing affordability crises in our small towns and rural communities. As inventories of rural buildable land decreases, the costs associated with rural housing increases and rural families are economically displaced out of their communities. Small towns are left without adequately zoned land to annex. They are left without options for appropriately zoned land for jobs and housing. The county's programs and obsolete land use zoning laws are leaving a legacy that spans across past, current and future rural generations.

The intent of the state's Growth Management Act was to address the housing needs of all populations, assuring affordable housing and economic growth. Small towns and rural communities are to be given deference. But Clark County applies behemoth rural permitting requirements that give no regard to protections for private property rights. Using fabricated environmental determinations, deeds to private properties are burdened with permanent conservation covenants. In most cases, the covenants are not warranted and are very costly to challenge. These covenants have the ability to override authorized zoned uses of private rural land and interfere with farming, daily rural activities, the keeping of livestock and the ability to have a home.

The county has been restricting private property rights and removing untold numbers of acres of viable land from production and converting them to wildlands, yet the taxes remain. Clark County has no FEIS accounting of how many thousands of acres have been consumed by aggressive riparian zones and permanent conservation covenants. Little regard is given to whether the lands are actually burdened with wetlands or critical lands that would make them eligible for conservation deed recordings.

This is not voluntary and landowners are not compensated for removal of land. The covenants remain on deeds in perpetuity and farmers are banned from ever working their land in a "riparian" zone again. The county is using regulations to highly restrict uses, reduce the land's value and create expensive permitting issues. Landowners have little recourse and must comply, in order to build on their private land. Private properties are being taken for public use without just compensation having been made.

When a landowner is required to dedicate land in a recorded covenant on their deed, the reasons should endure rigorous scrutiny to ensure such recordings are actually eligible and worthy of conservation protections, according to state and federal laws. Clark County goes to grerat lengths to

fabricate issues. In most cases, deed recordings defy justifications or common standards and are unwarranted. The recordings restrict land uses and legitimate functions. FEIS does not account for the thousands of acres of private land burdened with permanent conservation covenants.

Land that was once used for timber, crop production or grazing, may no longer be able to function because of regulatory overreach and must revert back to a *"natural state*." Restoration is demanded and the landowners must comply by paying for trees, vegetation, and maintenance in perpetulty. Now productive land becomes a defacto county conservation program. There is no accounting in the FEIS for altered private land placed in county conservation covenants and no accounting for lost buildable land for much-needed rural homes. There is no accounting for impacts from inflated county permit fees. Attempts to tackle the rural housing affordability crisis has taken a turn for the worse, but the taxes remain. This impact needs to be documented in the FEIS.

Landowners have little recourse once their properties are restricted from uses in recorded conservation covenants and deed recordings remain in *perpetuity.* The landowners are *not compensated and* land is not donated. These recordings are not voluntary. The real agenda is to wrest control of private property from landowners and give more authority to an agency that will benefit from weakened protections for private property rights. Covenants have potential to supersede authorized land use functions, common farming and forestry practices. Restricted land use is lost property rights.

When landowners participate in Federal Conservation programs, they do receive compensation. The Federal government recognizes private property rights and is willing to pay for it. *"Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions."*

32 years of county Growth Management Act planning, have given rise to countless environmental protections and adversarial regulations. For too long, rural landowners have been forced to permit under severe requirements that fail to match today's challenges. Importantly, they fail other state agency recommendations that also have authority. Clark County rural landowners bear unfair burdens for conservation programs when *all* should have to share that burden. The property rights of landowners fail to receive protections from arbitrary and discriminatory practices, forbidden in the GMA. This alone creates economic hardships along with overall losses in net acreage and functions of what little land is left for a landowner to use. No regard is given to property value, potential lost income and the impacts of lost buildable parcels for homes. Yet the taxes remain.

Select people who live in rural communities shouldn't carry all the burden that environmental policies create. No one should get a free pass, so why are some landowners compensated for their land value when they set aside their land using Clark County Conservation Futures Levy tax dollars, while other landowners have their land taken from them through permanent conservation covenants? A recent example shows a landowner was given monetary compensation from the county, for voluntarily exchanging some property rights for a conservation easement recorded on the property deed. The landowner was paid a large sum of money from the Consrvation Futures Levy tax fund. Yet, many more landowners are denied just compensation, and coerced into permanent deed restrictions that burden entire parcels. There is nothing voluntary about these permanent conservation covenants. The county should not continue to purchase more "Legacy Land" and conservation easements that directly benefit a select few, while many others have to give up their land, without compensation.

Clark County and the FEIS now have a “legacy” with troubling implications. A legacy of disparity, no measurable progress towards affordable rural housing, mounting property taxes, and no protection for private property rights. This is a legacy of restrictions, control over private properties and unabated property taxes. It is a legacy of harm to the taxpayers and rural people, caused by the county's own making. Corrections to rural zoning to assure fairness and equity.

Sincerely,

Susan Rasmussen, President

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P.O.Box 2188
Battle Ground, Washington 98604