From:	Cnty 2025 Comp Plan
To:	Clark County Citizens United, Inc.; Michelle Belkot; Glen Yung; Wil Fuentes; Matt Little; Sue Marshall; Kathleen Otto; Jeffrey Delapena; Oliver Orjiako; Jose Alvarez; Bart Catching; CommDev OA Land Use; Cnty 2025 Comp Plan
Cc:	Rebecca Messinger
Subject:	RE: The Clark County Comprehensive Plan Update and FEIS is fatally flawed.
Date:	Wednesday, September 16, 2026 10:32:00 AM
Attachments:	image001.png image002.png image003.png image004.png image005.png

Good day, Carol,

Thank you for submitting CCCU's amended comments related to the 2025 Comprehensive Plan Update.

These will be added to the Comprehensive Plan Index of Record. I am including Rebecca Messinger from the Council's Office as well to ensure the updated version is logged in their record.

Best regards,

Jeff Delapena
Program Assistant
COMMUNITY PLANNING

564.397.4558

NOTICE OF PUBLIC DISCLOSURE: This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this email, in whole or in part may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

From: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Sent: Wednesday, September 16, 2026 10:22 AM
To: 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>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez

<Jose.Alvarez@clark.wa.gov>; Bart Catching <Bart.Catching@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>
Subject: Fw: The Clark County Comprehensive Plan Update and FEIS is fatally flawed.

September 16, 2026

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN

Clark County Council
Clark County Community Developement
Clark County Planning Commission

Re: Email testimony for the record.

Clark County Citizens United, Inc. sent public restimony on September 15, 2026, for the purpose of the County Council Hearing on the same evening. It looks like they never got it. The email address for public testimony for that meeting didn't go through. I also see in the CCs that it did not go directly to the Council members, as intended. The email addresses CCCU sent the information to, are the people the email needs to go to.

That said, CCCU would like to correct or add a few words to the testimony to make it more complete.
I am resubmitting the testimony for all to review, not just the county staff. Please assure this is done.
Thank You!

Best Regards,

Carol Levanen, Exec Secretary

Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604

----- Forwarded Message -----
From: Rebecca Messinger <rebecca.messinger@clark.wa.gov>
To: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Cc: Oliver Orjiako <oliver.orjiako@clark.wa.gov>; Jose Alvarez <jose.alvarez@clark.wa.gov>; Bart Catching <bart.catching I will forward to the Council and add to the record.

Rebecca Messinger
Clerk to the Council
COUNTY MANAGER'S OFFICE

Phone: 564-397-4305
Email: Rebecca.Messinger@clark.wa.gov

From: Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Sent: Tuesday, September 15, 2026 4:49 PM
To: Clark County Citizens United, Inc. <cccuinc@yahoo.com>
Cc: Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Bart Catching <Bart.Catching@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>; Rebecca Messinger <Rebecca.Messinger@clark.wa.gov>
Subject: RE: The Clark County Comprehensive Plan Update and FEIS is fatally flawed.

Good day, Carol,

Thank you for submitting CCCU's comments related to the 2025 Comprehensive Plan Update.

These will be added to the Comprehensive Plan Index of Record. I am including Rebecca Messinger from the Council's Office as well for awareness.

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: Tuesday, September 15, 2026 4:43 PM
To: 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>; Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Bart Catching <Bart.Catching@clark.wa.gov>; CommDev OA Land Use <CommDevOALandUse@clark.wa.gov>; Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>
Subject: The Clark County Comprehensive Plan Update and FEIS is fatally flawed.

EXTERNAL: This email originated from outside of Clark County. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Clark County Council September 15, 2026
Clark County Community Development
Clark County Planning Commission
P.O. Box 5000

FOR THE PUBLIC RECORD AND THE COMPREHENSIVE PLAN UPDATE

Re: The Clark County Comprehensive Plan Update and FEIS is fatally flawed.

Dear Councilors, Commissioners and Staff,

Neither Clark County Citizens United, Inc. or the public, has any idea what the final Clark County Comprehensive Plan Update will look like. The FEIS is vague, and CCCU suspects the result will be the same as with other Comp Plan updates. They all endured major changes that were sprung on the citizens at the last minute, with no recourse for meaningful public input against what was adopted. Particularly egregious was the original 1994 Growth Management Act Comprehensive Plan with the Agri-forest massive down-zoning of 36,000 acres, which financially crippled many land owners. In the 2016 Plan, the Preferred Alternative 4 was thrown out and replaced by a mystery Plan predetermined behind the scenes, at the last minute. Alternative 4 was a county wide process, with county wide citizens support, that gave something to everyone. This bait and switch illegal activity has become commonplace for this county. That said, CCCU asks the Clark County Council to correct flawed defects in the Plan, and start with concerns numbered here.

1. No meaningful documentation shows the county has performed any effective planning for the rural areas, particularly as it relates to a variety of affordable housing. The Growth Management Act mandates that this be done. The county must plan for rural housing, as long as it is not urban in nature. That is a requirement of the GMA.

2. The FEIS claims all land in the county is good for commercial agriculture and must be preserved, while the county continuously removes it from inventory by way of Conservation Futures land purchases, Legacy land purchases, buffers, and permanent conservation covenants on private land. Thousands of acres, historically used for agriculture, are now gone and turned into fallow waste land.

3. The county claims much work was done to determine viable agriculture land, yet it failed to comply with mandatory GMA language that says to first use the Soil Survey of Clark County, Washington published by the United States Department of Agriculture Soil Conservation Service and the Washinron Agricultural Experiment Station NRCS – USDA Clark County 1972 Soils Manual. This document describes exactly where and what land is good for farming, with production charts for each soil type. Instead, the county hired a $140,000 consultant firm, which said all Clark County land is good for farming, which is simply not true. The GMA requires long term commercial significant agriculture.

4. The Office of Financial Management (OFM) 95/5 urban/rural population projection formula, used by the county, was illegal in the past, and continues to be illegal. The courts clearly said the formula is erroneous and cannot be used to cap rural growth. But the county continues to ignore the 1997 Superior Court order by Judge Edwin Poyfair and the 1999 Washington Court of Appeals Division II court orders. Clark County continues to apply that erroneous formula regardless of the law, leaving no future for the rural people.

5. The county is intent on taking all land in the county without paying for it, outside the urban growth areas by way of zoning and onerous regulations. So much so, it fabricates wetlands and critical lands to generate massive buffers and permanent conservation covenants on entire parcels, putting the county in complete control of private land. Constitutional property rights are being trampled and ignored. The erroneous buffers and permanent conservation covenant must be removed from code.

Clark County has much to do to rectify their mistakes in the Comprehensive Plan, and the sooner they begin doing that, the better. The Washington State Growth Management Act, and the United States Constitution, mandate protection of private property rights and just compensation for private property government takings. Clark County can start with complying with these state and federal laws.

Carol Levanen, Exec. Secretary

Clark County Citizens United, Inc.
P.O. Box 2188
Battle Ground, Washington 98604

Clark County Citizens United, Inc. P.O. Box 2188 Battle Ground, Washington 98604
E-Mail cccuinc@yahoo.com