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Via email to Councilors of the
Clark County Board of County Councilors

Re: Clark County Citizens United comments on the draft Buildable Lands Report scheduled for hearing on February 15, 2022

Dear Clark County Councilors:

We represent Clark County Citizens United, Inc., a grass roots nonprofit organization that represents a group of citizens who live in and are most concerned about the rural area of Clark County. We believe the draft Buildable Lands Report (Report) in its current form is legally deficient in at least two particular ways described below.

First, there appears to be a significant discrepancy in the Report's data regarding rural lands. The Report asserts that rural population growth was 1% for a total increase of 794 people. Report, at page 12, Fig. 2. At the same time the Report claims that rural share of new housing was at 6% of the 22,000 units of new housing for the same 2016-2020 time period. Report, at page 10. That equates to 1,320 new housing units in the rural area. From the face of the Report, there is some error in the data or analysis. It is highly unlikely that in the same time period (over four years) there would be approximately twice as many new homes as there are new people.

Second, RCW 36.70A.215 requires the Report to:

> (b) **Identify reasonable measures**, other than adjusting urban growth areas, that will be taken to comply with the requirements of this chapter. Reasonable measures are those actions **necessary to reduce the differences between growth and development assumptions and targets** contained in the countywide planning policies and the **county** and city **comprehensive plans with actual development patterns.**

RCW 36.70A.215(1)(b) (emphasis added); *see also* RCW 36.70A.215(2)(d).

There are differences between the growth and development assumptions in the comprehensive plan and actual development patterns. The Clark County Comprehensive Plan assumes that 10% of the population growth will be in the rural area.

> The Rural Area is not expected to accommodate large amounts of growth, but allows for low-density residential development and other traditional rural uses. . . .

> It is anticipated that 12,859 people or **10 percent of the new growth will be accommodated in the rural area.**

Comprehensive Plan, at 82 (emphasis added).

According to the Report, the County's population growth was 44,458 people. Report, at page 12, Fig. 2. Under the comprehensive plan, the population growth in the rural area should have been 10 percent of that number—4,446 people—but it was only 794 people. Report, at page 12, Fig. 2. The actual population growth in the rural area was only 18% of what the Comprehensive Plan planned for. There is clearly a difference between the assumptions and targets in the Comprehensive Plan and actual development patterns.

Because of those differences, RCW 36.70A.215(1)(b) and (2)(d), require the County to identify reasonable measures (other than adjusting urban growth areas) in the Buildable Lands Report to reduce these differences. Yet, the Report's section on reasonable measures constitutes one page that identifies various determinations made, but not one reasonable measure that could reduce the differences between the planned for rural growth and the actual development patterns. Report, at page 35. The reasonable measures section is inadequate in that it does not comply with RCW 36.70A.215(1)(b) and (2)(d).

Clark County Citizens United, Inc., believes there are many reasons for the vast discrepancy between the assumptions and targets in the Comprehensive Plan and the actual population growth in the rural area, such as the high cost of subdividing rural land and the limited opportunity for such subdivision. However, the primary point of this letter is that the draft Report fails to identify this discrepancy between reality and the comprehensive plan and fails to identify any reasonable measures for reducing the differences between comprehensive plan assumptions and the actual pattern of population growth. Before finalizing the Report, this issue should be addressed and Clark County Citizens United, Inc., is more than willing to provide information about the rural area to assist in analyzing required "reasonable measures."

Sincerely,

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