

From: [Carol Levanen](#)
To: [Eileen Quiring](#); [Shawn Hennessee](#); [Gary Medvigy](#); [John Blom](#); [Julie Olson](#); [Mitch Nickolds](#); [Temple Lentz](#); [Jose Alvarez](#)
Subject: Fw: Rural Character, GMA and buildable land - FOR THE PUBLIC RECORD
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FOR THE PUBLIC RECORD AND THE VACANT BUILDABLE LANDS

Dear Councilors,

The past few days, Clark County Citizens United, Inc. has been researching how Clark County's rural character is defined in the Comprehensive Plan. It is not "unique" at all and is very generic with language that says what it should be and general characteristics describing what the public's perception of rural is. It avoids getting to the point and defining the county's unique character, but instead describes what it is not. According to the Clark County Comprehensive Plan:

No single attribute describes the rural landscape. Instead combinations of characteristics which are found in rural settings impart the sense of what we commonly describe as rural. These factors are cumulative in nature and the more of these factors that are present influence feelings of whether a particular area is rural . . . When describing rural conditions the public will often describe these areas in term of a certain lifestyle. The factors listed below are those that usually describe "rural character."

the presence of large lots

limited public services present (water, sewer, police, fire, roads, etc.)

different expectations of levels of service provided

small scale resource activity

undeveloped natural landscape

wildlife and natural conditions predominate

closer relationships between nature and residents

personal open space

a sense of separation from intense human activity

a sense of self sufficiency; and

rural commercial supporting rural area population

This definition could apply to rural areas of Sitka, Alaska or the Islands of Hawaii. In contrast, the Plan should be defining the existing patterns of development and sizes

of parcels. These patterns tell the story of our “rural” history, honed by generations of folks living how they chose to live their lives and raise families. They tell the story of self-sustaining, hardy folks that are more likely to have been avid gardeners, attended church, fed large families, food preservers, kept livestock including a couple of horses. For the most part, they maintained jobs in town that supported their families. Their stories are told in historical USDA Census of Agriculture data, dating back to 1930. When approximately 90% of the rural lots are less than their zone, there is something wrong with the Comprehensive Plan and its compliance to the Growth Management Act.

CCCU sees other counties taking a different approach and using actual “ground truthing.” Lewis County goes so far as to use the words, “*value property rights, independently minded, self sustaining,*” in describing the character of their rural folks. What we have in Clark county is a manufactured, aspirational view of rural character that fails to recognize the patterns of small lot developments on the ground, fails to acknowledge our rural heritage, void of ground truthing. The large lot zoning results in a preponderance of non-conforming parcels to their zoning. Not at all reflective of the county’s early pioneering people who developed the unique character and patterns of the land you see today.

The Rural and Natural Resource Element remains obsolete in that it still references dairies, even though their numbers have declined and are no longer a significant part of local agriculture. While the 23 remaining dairy farms were already moving out 25 years ago, the robust growth of the equine community took hold. It is this trend that should be recognized. The Comprehensive Plan goes on to say:

As defined by WAC 365-195-210 (19), rural lands are those areas which lie outside of urban growth areas and do not include designated long-term resource lands (agriculture, forest or mineral resources). In Clark County, the rural area represents a lifestyle based on historical development patterns and resource-based industries such as commercial forestry, Christmas trees, dairies, berry farming, orchards and mining. Today much of the county’s rural lands include a mix of resource, small commercial, recreational and residential uses.

The language here leads one to believe many large commercial resource related endeavors have successfully been here all along. The words “commercial” industries relating to forestry, dairies, orchards, etc. are misleading and infers they are thriving. In fact, the USDA historical data reveals, “small farms, truck farms and dairies.” I believe the same is true for the small family tree lots. These studies reveal:

*Today, the average Clark County farm is suffering and operated at a net loss of - **\$4,844**, (2017 USDA Census of Agriculture). The farmgate values dropped from **\$54.4 million** in 2012, to **\$47.7 million** in 2017. The majority (48%) of county farms are sized 1-9 acres. Clark County has the smallest land mass (**628 sq. miles**) compared to Pierce (1,676 sq. miles), Thurston (727 sq. miles), and King County (2,126 sq. miles). Clark has the largest acres of land dedicated to farming, nearly double that of Pierce County, (**90,737** vs. 45,766 acres, 62,250 acres Thurston, 41,975 acres King). More telling, Clark’s farmgate values are the smallest. Since the 2002 Census of Agriculture, Clark County’s farmgate values have decreased and*

establishes a trend:

\$54.4 million in 2002, \$51 million 2012, \$47.7 million 2017

By contrast, Yakima County's farmgate values have increased

\$843 million in 2002, \$1.65 billion 2012, \$1.988 billion 2017

The USDA data reveals a different agricultural character in Clark County, than what is inferred in the Comprehensive Plan. Over the course of 25 years, the local face of agriculture and family-owned forests have changed while the land use zoning laws have remained stagnant.

The equines are acknowledged further in the **Rural and Natural Resource Element**, Pg. 89, under **Equestrian Element**. There is finally language;

. . . "contributions of equestrian livestock husbandry, training, competitive and recreational activities to the overall rural quality of life in Clark County. These activities provide a lifestyle value to numerous county residents and visitors and economic revenue for rural residents and business owners."

The value equestrians provide is recognized, but takes an entirely different tone in the next two paragraphs; on Pg. 90;

*As growth continues to occur throughout the county, open land to sustain livestock and existing. . . may be lost to uncoordinated land development. . . Also, requirements of the Endangered Species Act may limit livestock management choices and the location of new equestrian facilities on land constrained by large riparian corridors. Additionally, with the county's emphasis on preserving agricultural and forestry lands with the Resource and Rural Districts, the **development of large equestrian facilities of a size and scale that would be incompatible with agricultural and forestry practices within these districts should be discouraged.***

The Equestrian Community plays a vital role in Clark County's economy and rural character. . . is unique in the Portland metropolitan area for having many one – to ten-acre exurban parcels. These properties, many of which host equine uses, are a premium attraction for some. . . 4.8% of Clark County households own equines . . .

So, what is the county really saying and why is there conflicting language including, "should be discouraged." Now, this community is suffering. We know the planners have shut down rural growth with large lot zoning and provide little opportunities for people to own a few acres, let alone keep a horse. Acreage has become prohibitively expensive and out of reach for most because of the restrictive zoning. This action has spawned the growth of equine boarding facilities in old displaced dairy farms and other areas. They fill an obvious void created by our own urban planners. This is similar to how higher density housing catapulted the growth of the rental storage unit industry. You see storage units using large commercial parcels, yet providing few jobs in return. At least the equestrian facilities are proving to generate revenue and jobs while providing community enhancements.

If you connect all this with language and data included in the **1999 Clark County Monitoring Report**, it looks more like intentional displacement. That needs to be acknowledged and the practice of doing so must end. The GMA has pages of RCW relating to "Rural" and the importance of allowing such growth. Clark County has gone down the wrong path in planning and needs to follow a different path that leads to economic prosperity for all.

Sincerely,

Susan Rasmussen, President

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