

From: [Sonja Wiser](#)
To: [James D. Howsley](#)
Cc: [From: Julie A. Stenberg; Ezra L. Hammer; Bart Catching; Oliver Orjako](#)
Subject: Site Specific UGA Request
Date: Tuesday, January 16, 2024 1:13:00 PM
Attachments: [Lt. Clark County re Site-Specific UGA Request 1.9.24.pdf](#)

Dear Jamie Howsley: Thank you for your comments related to the 2025 Comp Plan. Your comments have been forwarded to staff and will be added to the 2025 Comp Plan Index of Record. Your name and email have been added to our database to receive future communications related to the 2025 Comp Plan. Please let us know if you have further questions. Thank you.

<https://clark.wa.gov/community-planning/2025-update-public-comment>

January 9, 2024

Clark County Board of County Council
c/o Oliver Orjiako, Community Planning Director
Clark County
1300 Franklin St.
Vancouver, WA 98660

E-mails: Oliver.Orjiako@clark.wa.gov, Rebecca.Messinger@clark.wa.gov

Re: ***Site-Specific Growth Management Area Change, Zone Change, and Comprehensive Plan Designation Change***

Dear Chair Bowerman, Councilors Belkot, Marshall, Medvigy, and Yung:

Our office represents the owners of four parcels with property identification numbers 168636000, 168635000, 168634000, and 168633000 (collectively, the “Properties”), which are located along 182nd Avenue northeast of NE 88th Street. This letter is written to respectfully request that Clark County (the “County”) approve: 1) the inclusion of the Properties in the City of Vancouver growth management area, 2) a zone change, and 3) a general plan designation change for the Properties. Letters from the property owners are included authorizing Jordan Ramis PC to represent their request for these changes.

The Properties currently have the Comprehensive Plan designation of AG, and a Zoning designation of Agriculture-20 (AG-20). The AG-20 designation is generally applied to lands that are at least 20 acres in size and have the growing capacity, productivity, soil composition, and surrounding land use to have long-term commercial significance for agriculture and associated resource production. However, none of the parcels are currently utilized for agricultural activities. Rather, they are surrounded on the west and south by rapidly expanding residential areas that include numerous subdivisions and units of new housing. The area is also served by nearby schools and commercial businesses. Additionally, due to changes in market conditions and the condition of on-site soils, it is no longer a viable, long-term strategy to utilize the Properties for agricultural purposes.

We are requesting that the County include the Properties in the Vancouver growth management area and change the Comprehensive Plan designation to Single Family Residential with no overlay and a Zoning designation to a mix of R1-10, R1-7.5, and R1-6, with higher density located near the nexus of NE 88th Street and NE 182nd Avenue and lower density located to the north and east of the site, also with no zoning overlay. Additionally, we would like to note that due to the size of the Properties, the owners plan to explore utilizing a planned unit development process during the development process. Doing so will help support much needed housing in a manner that is complimentary to the City and the County goals pertaining to housing, transportation, and environmental protection.

These site-specific requests are submitted for consideration during the current Comprehensive Plan Periodic Update 2025 (the “2025 Plan”) in compliance with Clark County Unified Development Code

(CCC) 40.560.010. We respectfully request the County make the aforementioned changes to the Properties because they are ideally situated to help spur housing development.

We have attached the following exhibits for reference:

Exhibit A – Map Identifying the Properties

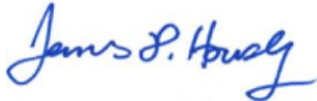
Exhibit B – Letters of Authorization from the Property Owners

Once the 2025 Plan update schedule is finalized, we intend to submit a detailed narrative in support of this request, addressing the criteria of the Growth Management Act (GMA), CCC, and Clark County's 20-Year Comprehensive Plan.

Thank you for your consideration of this request.

Very truly yours,

JORDAN RAMIS PC



Jamie D. Howsley
Admitted in Oregon and Washington

cc: Client
Ezra Hammer, Jordan Ramis PC

Exhibit A

Maps Identifying the Properties Parcel 168636000

General Information

Property Account	168636000
Site Address	8817 NE 182ND AVE, VANCOUVER, WA 98682
Legal Desc	#26 SEC 6 T2N R3EWM 20.50A
Owner	HURLEY INVESTMENT HOLDINGS I LLC
Mail Address	275 W 3RD ST #300 VANCOUVER WA , 98660
Tax Status	Regular
Property Status	Active
Area (approx.)	892,960 sq. ft. / 20.5 acres
Section-Township-Range	NE 1/4,S06,T2N,R3E

Assessment (2023 Values for 2024 Taxes)

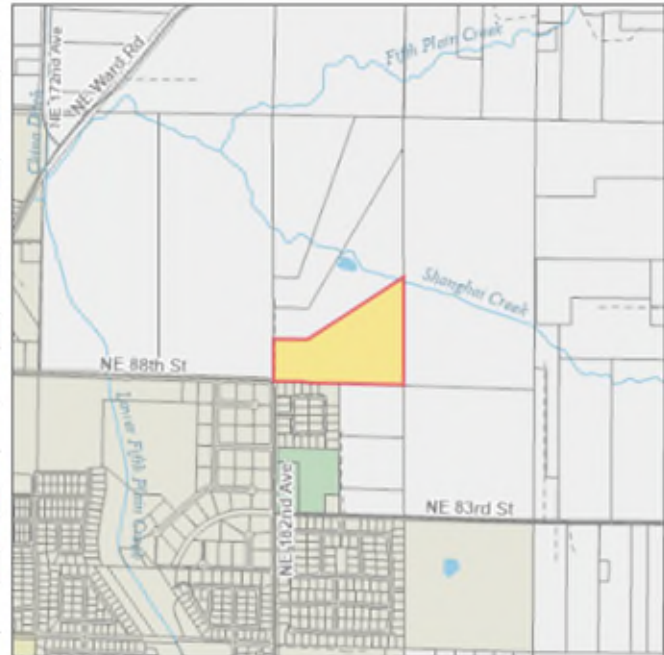
Land Value	\$415,011.00
Building Value	\$32,321.00
Total Property Value	\$447,332.00
Total Taxable Value	\$91,995.00

Most Recent Sale

Sale Date	03/29/2023
Document Type	D-QCD
Sale Number	878476
Sale Amount	\$0.00

Administrative

Jurisdiction	Clark County
Land Use Planning	
Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	406.03
Drainage District	n/a
Neighborhood	Proebstel
Park District	n/a
Public Safety	
Burning Allowed	Yes
EMS Response Area	AMR
Fire District	FD 5
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO Central
Schools	
School District Name	Evergreen
Elementary School Attendance Area	Pioneer



Environmental Public Health

Public Health Food Inspector District	District 9
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 1

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0403D 53011C0411D
Flood Hazard Area	Floodway Fringe
Shoreline Designation	Rural Conservancy Resource Land
Soil Types / Class	Hydric / CvA Non-Hydric / DoB Non-Hydric / HIA Hydric / HtA
Water Resource Inventory Area	Name: SALMON-WASHOUGAL Sub-Basin: LaCamas
Watershed	Lacamas Creek
Sub Watershed	Lower Fifth Plain Creek Shanghai Creek
Wetland Class	PEMW
Wetland Inventory	Presence

Geological Hazards

Geological Hazard	
Liquefaction	Very Low
NEHRP Class	C
Slope Stability	

Parcel 168635000

General Information

Property Account	168635000
Site Address	
Legal Desc	#25 SEC 6 T2N R3EWM 20.50A
Owner	HURLEY INVESTMENT HOLDINGS I LLC
Mail Address	275 W 3RD ST #300 VANCOUVER WA , 98660
Tax Status	Regular
Property Status	Active
Area (approx.)	892,980 sq. ft. / 20.5 acres
Section-Township-Range	NE 1/4,S06,T2N,R3E

Assessment (2023 Values for 2024 Taxes)

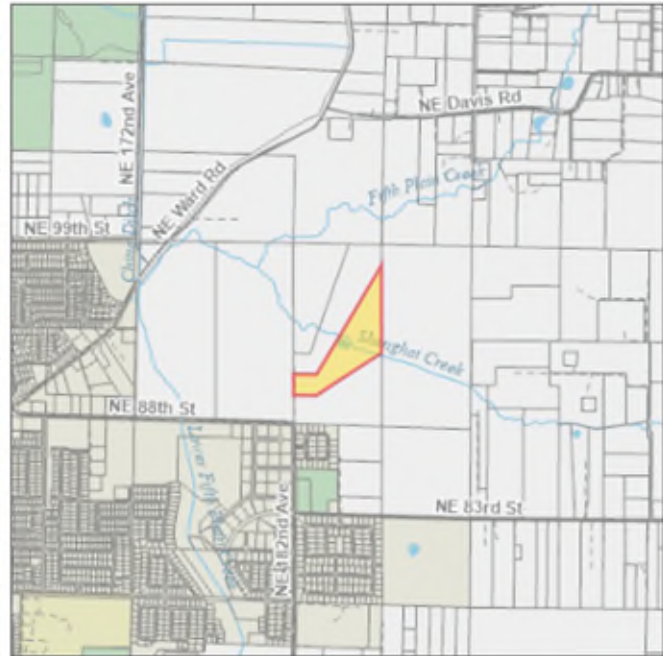
Land Value	\$394,233.00
Building Value	\$0.00
Total Property Value	\$394,233.00
Total Taxable Value	\$31,852.00

Most Recent Sale

Sale Date	03/29/2023
Document Type	D-QCD
Sale Number	878476
Sale Amount	\$0.00

Administrative

Jurisdiction	Clark County
Land Use Planning	
Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	406.03
Drainage District	n/a
Neighborhood	Proebstel
Park District	n/a
Public Safety	
Burning Allowed	Yes
EMS Response Area	AMR
Fire District	FD 5
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO Central
Schools	
School District Name	Evergreen
Elementary School Attendance Area	Pioneer



Environmental Public Health

Public Health Food Inspector District	District 9
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 1

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0403D
Flood Hazard Area	Floodway Fringe
Shoreline Designation	Rural Conservancy Resource Land
Soil Types / Class	Hydric / CvA Non-Hydric / DoB Non-Hydric / HIA Hydric / HtA
Water Resource Inventory Area	Name: SALMON-WASHOUGAL Sub-Basini: LaCamas
Watershed	Lacamas Creek
Sub Watershed	Lower Fifth Plain Creek Shanghai Creek
Wetland Class	PEMW
Wetland Inventory	Presence

Geological Hazards

Geological Hazard	
Liquefaction	Very Low
NEHRP Class	C
Slope Stability	

Parcel 168634000

General Information

Property Account	168634000
Site Address	9201 NE 182ND AVE, VANCOUVER, WA 98682
Legal Desc	#24 SEC 6 T2N R3EWM 20.50A
Owner	HURLEY JESSE R & HURLEY LINDA L
Mail Address	9201 NE 182ND AVE VANCOUVER WA , 98682
Tax Status	Regular
Property Status	Active
Area (approx.)	892,980 sq. ft. / 20.5 acres
Section-Township-Range	NE 1/4,S06,T2N,R3E

Assessment (2023 Values for 2024 Taxes)

Land Value	\$419,810.00
Building Value	\$637,081.00
Total Property Value	\$1,056,891.00
Total Taxable Value	\$710,800.00

Most Recent Sale

Sale Date	05/06/2020
Document Type	D-QCD
Sale Number	5737803
Sale Amount	\$98,750.00

Administrative

Jurisdiction	Clark County
Land Use Planning	
Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	406.03
Drainage District	n/a
Neighborhood	Proebstel
Park District	n/a
Public Safety	
Burning Allowed	Yes
EMS Response Area	AMR
Fire District	FD 5
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO Central
Schools	
School District Name	Evergreen



Environmental Public Health

Public Health Food Inspector District	District 9
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 1

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0403D
Flood Hazard Area	Floodway Fringe
Shoreline Designation	Rural Conservancy Resource Land
Soil Types / Class	Hydric / CvA Non-Hydric / DoB Hydric / HtA
Water Resource Inventory Area	Name: SALMON-WASHOUGAL Sub-Basin: LaCamas
Watershed	Lacamas Creek
Sub Watershed	Lower Fifth Plain Creek Shanghai Creek Upper Fifth Plain Creek
Wetland Class	PEMW
Wetland Inventory	Presence

Geological Hazards

Geological Hazard	
Liquefaction	Very Low
NEHRP Class	C
Slope Stability	

Parcel 168633000

General Information

Property Account	168633000
Site Address	
Legal Desc	#23 SEC 6 T2N R3EWM 20.50A
Owner	HURLEY INVESTMENT HOLDINGS I LLC
Mail Address	275 W 3RD ST #300 VANCOUVER WA , 98660
Tax Status	Regular
Property Status	Active
Area (approx.)	892,980 sq. ft. / 20.5 acres
Section-Township-Range	NE 1/4,S06,T2N,R3E

Assessment (2023 Values for 2024 Taxes)

Land Value	\$385,827.00
Building Value	\$0.00
Total Property Value	\$385,827.00
Total Taxable Value	\$21,708.00

Most Recent Sale

Sale Date	03/29/2023
Document Type	D-QCD
Sale Number	878475
Sale Amount	\$0.00

Administrative

Jurisdiction	Clark County
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Land Use Planning

Comprehensive Plan Designation	AG
Comprehensive Plan Overlay(s)	none
Urban Growth Area	County
Zoning Designation - Codes	Agriculture-20 (AG-20)
Zoning Overlay(s)	none

Miscellaneous

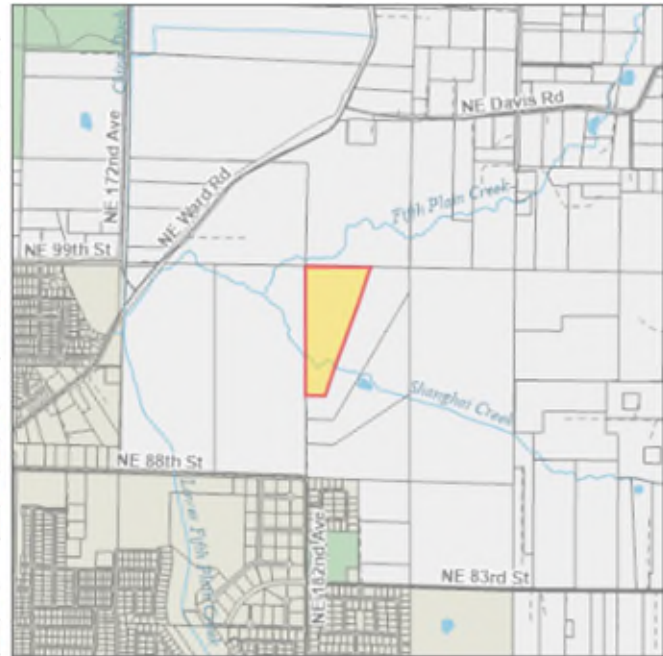
Census Tract	406.03
Drainage District	n/a
Neighborhood	Greater Brush Prairie
Park District	n/a

Public Safety

Burning Allowed	Yes
EMS Response Area	AMR
Fire District	FD 5
Increased Wildfire Danger Area	No
Police Jurisdiction	CCSO Central

Schools

School District Name	Evergreen
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Environmental Public Health

Public Health Food Inspector District	District 9
Public Health Food Plan Review Area	District A
Public Health WRAP Inspector District	District 1

Wetlands and Soil Types

Critical Aquifer Recharge Area	Category 2 Recharge Areas
FEMA Map / FIRM Panel	53011C0403D
Flood Hazard Area	Floodway Fringe
Shoreline Designation	Rural Conservancy Resource Land
Soil Types / Class	Hydric / CvA Non-Hydric / DoB
Water Resource Inventory Area	Name: SALMON-WASHOUGAL Sub-Basin: LaCamas
Watershed	Lacamas Creek
Sub Watershed	Shanghai Creek Upper Fifth Plain Creek
Wetland Class	No Mapping Indicators
Wetland Inventory	Presence


Geological Hazards

Geological Hazard	
Liquefaction	Very Low
NEHRP Class	C
Slope Stability	


EXHIBIT B

LETTER OF AUTHORIZATION

We, the undersigned, are the owners of record for the real property with Property Identification Number 168634000 (the "Property"). We hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County include the Property in the City of Vancouver growth management area and change the zoning and general plan designation for the Property.

Signature: 
Jesse Hurley

Date: 1/7/24

Signature: 
Linda Hurley

Date: 1/7/24

Signature: 
Rebecca Hurley


Date: 1/7/24

Signature: 
Ryan Hurley

Date: 1/7/24

EXHIBIT B
LETTER OF AUTHORIZATION

HURLEY INVESTMENT HOLDINGS I LLC, is the owner of record for the real property with Property Identification Numbers 168636000, 168635000, and 168633000 (the "Properties"). We hereby authorize Jordan Ramis PC, and its counsel, to file any and all required applications, documents, and correspondence with the relevant Washington State, Clark County, and local authorities to request that Clark County include the Properties in the City of Vancouver growth management area and change the zoning and general plan designation for the Properties. I acknowledge this authorization on behalf of HURLEY INVESTMENT HOLDINGS I LLC.

Signature: 
Name: Ryan Hurley
Title: Member
Date: January 7, 2024