From: Sonja Wiser
To: James D. Howsley

Cc: From: Julie A. Stenberg; Ezra L. Hammer; Bart Catching; Oliver Orjiako

**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



Jamie D. Howsley jamie.howsley@jordanramis.com WA Direct Dial: (360) 567-3913 OR Direct Dial: (503) 598-5503

PacWest, 27th Floor 1211 SW Fifth Avenue Portland, OR 97204 **T** (503) 598-7070 **F** (503) 598-7373

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 182<sup>nd</sup> Avenue northeast of NE 88<sup>th</sup> 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 88<sup>th</sup> Street and NE 182<sup>nd</sup> 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

Jams J. House

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		/	The state of the s
Property Account	168636000	2 8	NEW PLOTON DOWN
Site Address 881	7 NE 182ND AVE, VANCOUVER, WA 98682		
Legal Desc	#26 SEC 6 T2N R3EWM 20,50A		/
Owner HURLEY	INVESTMENT HOLDINGS I LLC	9	
Mail Address	275 W 3RD ST #300 VANCOUVER WA , 98660		
Tax Status	Regular	4\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Su
Property Status	Active		Shanghar Court
Area (approx.)	892,980 sq. ft. / 20.5 acres		
Section-Township- Range	NE 1/4,S06,T2N,R3E	NE 88th St	
Assessment (2023 Values for 2024 Taxes	()		
Land Value	\$415,011.00		
Building Value	\$32,321.00		NE 83rd St
Total Property Value	\$447,332.00		中華組
Total Taxable Value	\$91,995.00		
Most Recent Sale			
Sale Date	03/29/2023	gundanimo Variation	
Document Type	D-QCD	Environmental Public Health	
Sale Number	878476		
Sale Amount	\$0.00	Public Health Food Inspector Distric	
Administrative		Public Health Food Plan Review Area Public Health WRAP Inspector Distri	
***************************************		Public Health WRAP Inspector Distri	ct District 1
Jurisdiction	Clark County	Wetlands and Soil Types	
Land Use Planning		Critical Aquifer Recharge Area	Category 2 Recharge Areas
Comprehensive Plan Designation	AG	FEMA Map / FIRM Panel	53011C0403D
Comprehensive Plan Overlay(s)	none		53011004110
Urban Growth Area	County	Flood Hazard Area	Floodway Fringe
Zoning Designation - Codes	Agriculture-20 (AG-20)	Shoreline Designation	Rural Conservancy Resource Land
Zoning Overlay(s)	none	Soil Types / Class	Hydric / CvA Non-Hydric / DoB
Miscellaneous			Non-Hydric / HIA
Census Tract	406.03		Hydric / HtA
Drainage District	n/a	Water Resource Inventory Area	Name: SALMON-WASHOUGAL Sub-Basin: LaCamas
Neighborhood	Proebstel	Watershed	Lacamas Creek
Park District	n/a	Sub Watershed	Lower Fifth Plain Creek
Public Safety	22		Shanghai Creek
Burning Allowed	Yes	Wetland Class	PEMW
EMS Response Area	AMR	Wetland Inventory	Presence
Fire District	FD 5	Geological Hazards	
Increased Wildfire Danger Area	No		
Police Jurisdiction	CCSO Central	Geological Hazard	Marie Law
Schools		Liquefaction	Very Low
School District Name	Evergreen	NEHRP Class	C

#### Parcel 168635000

General Information			
Property Account	168635000		
Site Address		- AV	NE Davis Rd
Legal Desc #2	5 SEC 6 T2N R3EWM 20.50A	• IZung	NE DAVIS
Owner HURLEY IN	IVESTMENT HOLDINGS I LLC		
Mail Address	275 W 3RD ST #300 VANCOUVER WA , 98660	NE 99th St. G - 48	Fint Plan Cross
Tax Status	Regular	NE 99th St C	
Property Status	Active		1 _
Area (approx.)	892,980 sq. ft. / 20.5 acres		
Section-Township-Range	NE 1/4,506,T2N,R3E		Release
Assessment (2023 Values for 2024 Taxes)			Chart Chart
Land Value	\$394,233.00	NE 88th St	
Building Value	\$0.00		
Total Property Value	\$394,233.00		
Total Taxable Value	\$31,852.00		NE 83rd St
Most Recent Sale			
Sale Date	03/29/2023	The state of the s	
Document Type	D-QCD		4 8 1 1 1 1
Sale Number	878476		
Sale Amount	\$0.00	Environmental Public Health	
Administrative		Public Health Food Inspector District	District 9
Jurisdiction	Clark County	Public Health Food Plan Review Area	District A
Land Use Planning	Clark County	Public Health WRAP Inspector District	District 1
Comprehensive Plan Designation	AG	Wetlands and Soil Types	
Comprehensive Plan Overlay(s)	none	Critical Aquifer Recharge Area	Category 2 Recharge Areas
Urban Growth Area	County	FEMA Map / FIRM Panel	53011C0403D
Zoning Designation - Codes	Agriculture-20 (AG-20)	Flood Hazard Area	Floodway Fringe
Zoning Overlay(s)	none	Shoreline Designation R	tural Conservancy Resource Land
Miscellaneous	none	Soil Types / Class	Hydric / CvA
Census Tract	406.03		Non-Hydric / DoB Non-Hydric / HIA
Drainage District	n/a		Hydric / HtA
Neighborhood	Proebstel	Water Resource Inventory Area	Name: SALMON-WASHOUGAL
Park District	n/a		Sub-Basin: LaCamas
Public Safety	n/a	Watershed	Lacamas Creek
Burning Allowed	Yes	Sub Watershed	Lower Fifth Plain Creek Shanghai Creek
EMS Response Area	AMR	Wetland Class	PEMW
Fire District	FD 5	Wetland Inventory	Presence
Increased Wildfire Danger Area	No		rieselice
Police Jurisdiction	CCSO Central	Geological Hazards	
Schools	CCGC Central	Geological Hazard	
School District Name	Evergreen	Liquefaction	Very Low
Elementary School Attendance Area	Pioneer	NEHRP Class	С
continuous de la contraction d	Fioneer	Slope Stability	



**General Information** 

#### Parcel 168634000

Property Account	168634000
Site Address	9201 NE 182ND AVE, VANCOUVER WA 98683
Legal Desc	#24 SEC 6 T2N R3EWM 20.50A
Owner	HURLEY JESSE R & HURLEY LINDA
Mail Address	9201 NE 182ND AVE VANCOUVER WA , 98682
Tax Status	Regula
Property Status	Active
Area (approx.)	892,980 sq. ft. / 20.5 acres
Section-Township- Range	NE 1/4,S06,T2N,R36
Assessment (2023 Values for 2024	4 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-QCI
Sale Number	573780
Sale Amount	\$98,750.00
Administrative	
Jurisdiction	Clark Count
Land Use Planning	
Comprehensive Plan Designation	AC
Comprehensive Plan Overlay(s)	none
Urban Growth Area	Count
Zoning Designation - Codes	Agriculture-20 (AG-20
Zoning Overlay(s)	none
Miscellaneous	
Census Tract	406.03
Drainage District	n/i
Neighborhood	Proebste
Park District	n/a
Public Safety	
Burning Allowed	Ye
EMS Response Area	AME
Fire District	FD :
Increased Wildfire Danger Area	Ne
Police Jurisdiction	CCSO Centra
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	

Public Fredict Work Englactor Disc	The District A
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	С
Slope Stability	



#### Parcel 168633000

General Information	
Property Account	168633000
Site Address	
Legal Desc	#23 SEC 6 T2N R3EWM 20.50/
Owner HU	RLEY INVESTMENT HOLDINGS I LLC
Mail Address	275 W 3RD ST #300 VANCOUVER WA , 98660
Tax Status	Regula
Property Status	Activ
Area (approx.)	892,980 sq. ft. / 20.5 acre
Section-Township-Range	NE 1/4,S06,T2N,R38
Assessment (2023 Values for 2024	Taxes)
Land Value	\$385,827.00
Building Value	\$0.00
Total Property Value	\$385,827.00
Total Taxable Value	\$21,708.0
Most Recent Sale	
Sale Date	03/29/202
Document Type	D-QCI
Sale Number	87847
Sale Amount	\$0.00
Sale Amount  Administrative  Jurisdiction	<b>—</b>
Sale Amount  Administrative  Jurisdiction  Land Use Planning	Clark Count
Sale Amount  Administrative  Jurisdiction  Land Use Planning  Comprehensive Plan Designation	Clark Count
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s)	Clark Count
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area	Clark Count AC non- Count
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes	Clark County  AC  none  County  Agriculture-20 (AG-20
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s)	Clark County  AC  none  County  Agriculture-20 (AG-20
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous	Clark County  AC  none  County  Agriculture-20 (AG-20  none
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract	Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.03
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous	Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.03
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract Drainage District	Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.00  n/a  Greater Brush Prairie
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract Drainage District Neighborhood	Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.00  n/a  Greater Brush Prairie
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract Drainage District Neighborhood Park District	Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.03  Greater Brush Prairie
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract Drainage District Neighborhood Park District Public Safety	Clark County  AC  none  County Agriculture-20 (AG-20  none  406.0:  n/c  Greater Brush Prairie  n/c  Ye
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract Drainage District Neighborhood Park District Public Safety Burning Allowed	Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.0:  n/s  Greater Brush Prairie  n/s  Ye  AMS
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract Drainage District Neighborhood Park District Public Safety Burning Allowed EMS Response Area	Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.00  n/4  Greater Brush Prairie  n/4  Ye  AMI
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract Drainage District Neighborhood Park District Public Safety Burning Allowed EMS Response Area Fire District	Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.03  n/s  Greater Brush Prairie  n/s  Yee  AMF  FD :
Administrative Jurisdiction Land Use Planning Comprehensive Plan Designation Comprehensive Plan Overlay(s) Urban Growth Area Zoning Designation - Codes Zoning Overlay(s) Miscellaneous Census Tract Drainage District Neighborhood Park District Public Safety Burning Allowed EMS Response Area Fire District Increased Wildfire Danger Area	\$0.00  Clark County  AC  none  County  Agriculture-20 (AG-20  none  406.03  n/a  Greater Brush Prairie  n/a  Yee  AMF  FD :  No  CCSO Centra



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	

Citical Adulter 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



PACWEST, 27th Floor 1211 SW Fifth Avenue Portland, OR 97204 T (503) 598-7070 F (503) 598-7373

#### **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: Date: Signature: 4 Date: Signature: Date: Signature: Date:



PACWEST, 27th Floor 1211 SW Fifth Avenue Portland, OR 97204 **T** (503) 598-7070 **F** (503) 598-7373

### 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:

Title:

Date:

January 7 2024