

**From:** [Sonja Wiser](#)  
**To:** [Angie Merrill](#); [Cnty 2025 Comp Plan](#); [Bart Catching](#)  
**Subject:** RE: 2025 Comp Plan Comments parcels 200326000 & 200355000  
**Date:** Wednesday, March 13, 2024 9:12:54 AM

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Good morning Angie: Thank you for your comments related to the 2025 Comp Plan/ parcels 200326000 & 200355000. 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>

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**From:** Angie Merrill <angiem@buildplh.com>  
**Sent:** Tuesday, March 12, 2024 10:25 AM  
**To:** Cnty 2025 Comp Plan <comp.plan@clark.wa.gov>  
**Subject:** 2025 Comp Plan Comments parcels 200326000 & 200355000

**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.

Good morning,

I would like to submit the attached documents for the Comprehensive Plan Update Comments.

The request is regarding parcels 200326000 & 200355000.

Thank you,

**Angie Merrill**  
**Project Manager – Land Development**  
Pacific Lifestyle Homes  
[www.PacificLifestyleHomes.com](http://www.PacificLifestyleHomes.com)  
Direct 360.213.0826

Situated within the *Greater Brush Prairie Neighborhood* and substantially surrounded by an array of residential zoning for the greater part of a one-mile radius, the subject parcels (200326000 & 200355000) are comprised of approximately 60 pristine acres. Ideally situated between residential R1-5 and R1-6 zoning along with a future school site to the south, the site offers a great opportunity to transition between such uses and support the overall neighborhood goals of reducing industrial development in rural areas. For this reason, the applicant is requesting a zone change from Business Park (BP) to Single-Family Residential R1-5 in order to compliment the surrounding zoning designations and support the neighborhood associations stated goal.

As business park and office space vacancy rates within Clark County have hit an all-time high in recent years, the parcels current BP zoning designation is arguably the least strategic use of the site. It's current zoning not only conflicts with the surrounding designations but does nothing to help reduce the current housing crisis the county and state are experiencing. If approved, the requested R1-5 zone change would be one step in the right direction to help support relief and resolution from the current housing crisis.

The following materials demonstrate compliance with the criteria of the requested zone change:

**Applicable Criteria, Evaluation and Findings Criteria:**

For All Map Changes:

1. The proponent shall demonstrate that the proposed amendment is consistent with the applicable requirements of the GMA and the WAC, the county comprehensive plan, the county code, and official population growth forecasts:

The applicable goals that apply to this proposal are Goals 1, 2, 4 & 5

- a. **Goal 1 Urban Growth** - "Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner [RCW 36.370A.020(1) and WA 365-196-310(2)(i)]

*Urban services (water & sewer) are currently located on the subject properties. Changing the zone to a high single-family residential zone would encourage development within the urban area.*

- b. **Goal 2 Reduce Sprawl** - "Reduce the inappropriate conversion of undeveloped land into sprawling, low density development" [RCW 36.70A.020(2)]

*Changing the zone to R1-5 would allow for a higher density with a variety of housing options to avoid undeveloped low-density land divisions.*

- c. **Goal 4 Housing** – Encourage the availability of affordable housing to all economic segments of the population of this state, promote a variety of residential densities and housing types and encourage preservation of existing housing stock. [RCW 36.70A.020(4)]

***The R1-5 zone district will allow for affordable housing for all economic segments of the population of the state and will promote a variety of housing types and densities.***

- d. **Goal 5 Economic Development** – Encourage economic development throughout the state that's consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state. [RCW36.70A.020(5)]

***Allowing for R1-5 zoning would create short -term and long-term employment opportunities to include the development and construction of the residential land divisions and on-going employment for the utility and public workers, not to mention "remote employees".***

***The demand for office space is decreasing?***

***Studies have found that office attendance has held steady at 30 percent below pre-pandemic norms, and that even by 2030, demand for office space will be lower than it was in 2019.***

2. The proponent shall demonstrate that the designation is in conformance with the appropriate locational criteria identified in the plan; and

***Urban High***

***The R1-5 designation provides for high density residential development to include PUD requirements with a density of 8.7-6.2 dwelling units per acre or R1-5 single-family residential that allows for 6.9 dwelling units per acre to include the gross acreage of the site. The densities will assure public services shall be maximized, including connection to public water and sewer. In addition to single-family residential lots CCC Table 40.220.010-1 allows for many uses within the R1-5 zone district.***

3. The map amendment or site is suitable for the proposed designation, and there is a lack of appropriately designated alternative sites within the vicinity; and

***The map amendment is suitable for the R1-5 designation. It will align with the surrounding zone districts. There's not a lack of (R1) zoning within the vicinity, however the R1-5 zone will allow for affordable housing with a variety of housing options that's needed in the Vancouver area.***

4. The plan map amendment either: (a) responds to a substantial change in conditions applicable to the area within which the subject property lies; (b) better implements applicable comprehensive plan policies than the current map designation; or (c) corrects an obvious mapping error; and

***The current (BP) Business Park zoning is not compatible with the surrounding residential and Battle Ground School District. The R1-5 zone district is intended to provide for higher single densities where a full range of community services and facilities are present or will be present at the time of development. Currently the Battle Ground School district owns the***

***property abutting the southern portion of the parcel. The (BP) Business Park zone will not provide a full range of community services for the area and will not provide for safe walking***

***or commuting conditions for the school district. The R1-5 zone will provide compatibility for the school and residential zones.***

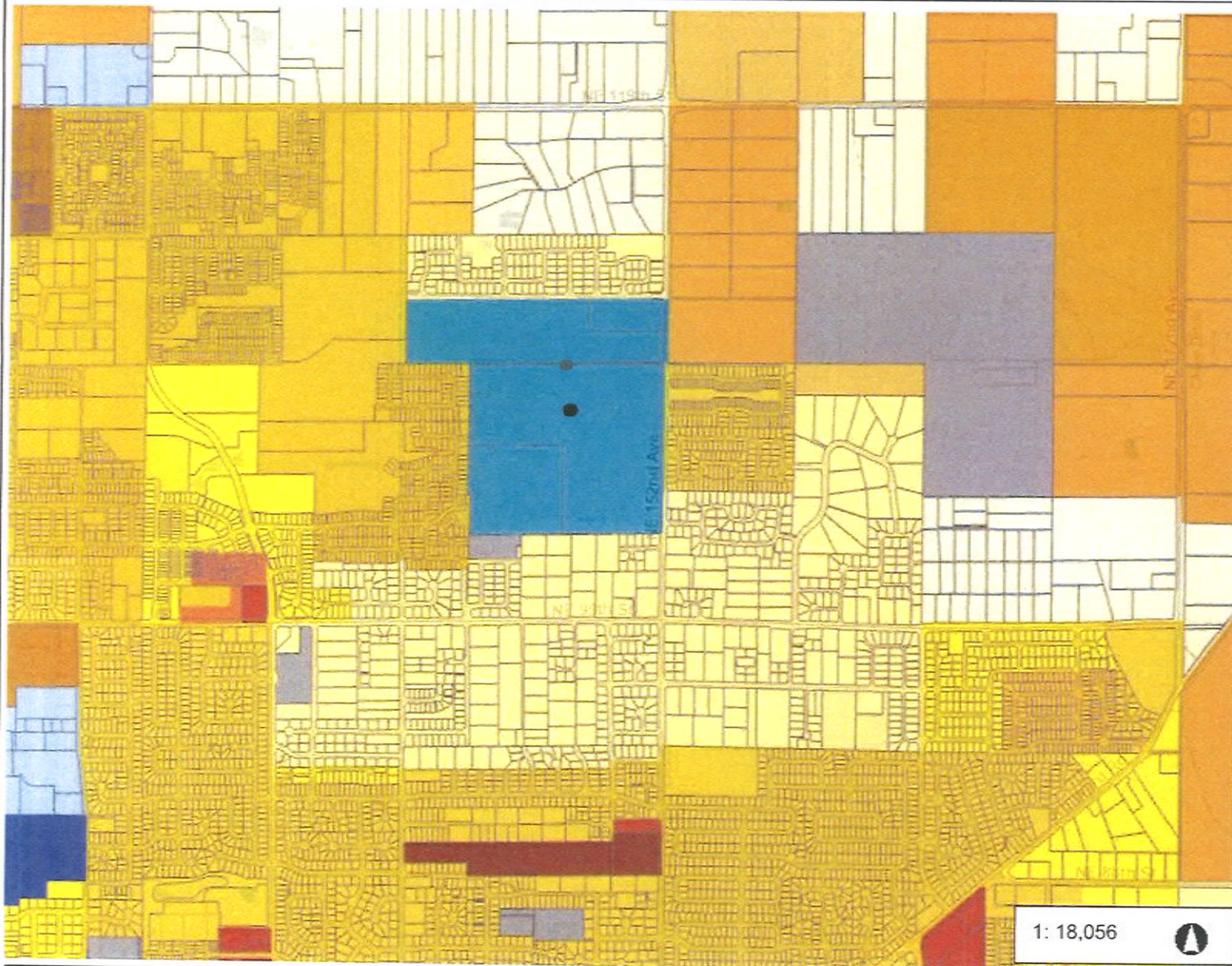
5. Where applicable, the proponent shall demonstrate that the full range of urban public facilities and services can be adequately provided in an efficient and timely manner to serve the proposed designation. Such services may include water, sewage, storm drainage, transportation, fire protection, and schools. Adequacy of services applies only to the specific change site.

***The full range of urban public facilities and services are available to serve residential uses at the site. The site is within the Vancouver Urban Growth area. Water and sewer service in this area will be provided by the City of Vancouver. Future development of all lots in the urban area will be required to provide a separate stormwater system at the time of development. The site is in the Battle Ground School District. The site is served by Fire District 5. Public open space and recreation opportunities are available at the Hockinson Community Park to the east and Cherry Park to the south. A single-family residential neighborhood shall have a lesser impact on the transportation and the amount of trips versus a business park.***





# Zoning Map



## Legend

- Taxlots
- Zoning**
- Single-Family residential (R1-20, R
- Single-Family residential (R1-15, R
- Single-Family residential - 12 (R-12
- Single-Family residential (R1-10, R
- Single-Family residential (R1-7.5, F
- Single-Family residential (R1-6, R-6
- Single-Family residential (R1-5)
- Residential (R-12, R12)
- Residential (R-18, MF-18)
- Residential (R-22, AR-22)
- Residential (R-30)
- Residential (R-43)
- Office residential-15 (OR-15)
- Office residential-18 (OR-18)
- Office residential-22 (OR-22)
- Office residential-30 (OR-30)
- Office residential-43 (OR-43)
- Neighborhood commercial (NC, C1
- Community commercial (CC, C2, C
- General commercial (GC, CG)
- Mixed use (MX)
- Business park (BP, OFF)

## Notes:

1: 18,056



3,009.3      0      1,504.67      3,009.3      Feet

WGS\_1984\_Web\_Mercator\_Auxiliary\_Sphere  
Clark County, WA. GIS - <http://gis.clark.wa.gov>

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