

**From:** [Oliver Orjiako](#)  
**To:** [Jeffrey Delapena](#)  
**Subject:** FW: Public comment- Land Use Alternatives  
**Date:** Friday, September 13, 2024 1:55:56 PM  
**Attachments:** [image001.png](#)  
[NWPpartners\\_Comp\\_Plan\\_Land\\_Use\\_Alternatives-FINAL.docx](#)

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Hi Jeff,

Please, add to the comp plan index of record. Thanks.

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**From:** Noelle Lovern <Noelle@biaofclarkcounty.org>  
**Sent:** Friday, September 13, 2024 1:49 PM  
**To:** Gary Medvigy <Gary.Medvigy@clark.wa.gov>; Karen Bowerman <Karen.Bowerman@clark.wa.gov>; Michelle Belkot <Michelle.Belkot@clark.wa.gov>; Glen Yung <Glen.Yung@clark.wa.gov>; Sue Marshall <Sue.Marshall@clark.wa.gov>; Kathleen Otto <Kathleen.Otto@clark.wa.gov>; Oliver Orjiako <Oliver.Orjiako@clark.wa.gov>; Jose Alvarez <Jose.Alvarez@clark.wa.gov>; Michelle Pfenning <Michelle.Pfenning@clark.wa.gov>  
**Subject:** Public comment- Land Use Alternatives

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Good afternoon,

On behalf of NW Partners along with the BIA, CCAR, CREDC, Jordan Ramis and Aho Construction, we are submitting the attached letter to be entered into the record for the 2025 Comprehensive Plan Update. The attached comment addresses our collective recommendations for the proposed land use alternatives.

We are available for questions regarding this comment should you require clarification.

Best,

**Noelle Lovern | Government Affairs Director**  
**BIA of Clark County - a Top 30 NAHB Association**  
*Protecting and promoting the building industry.*

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Chair Gary Medvigy  
County Council  
PO Box 5000  
Vancouver, WA 98666-5000

September 13, 2024

**Re: Clark County Comprehensive Plan Land Use Alternatives**

Dear Chair Medvigy, Clark County Councilors, County Manager, & Director of Community Planning;

The below signed represent dozens of individuals, companies, and organizations that live, work, and play in Clark County. We are deeply committed to ensuring that Clark County has enough available, developable land for new and existing businesses to find the property they need to produce new job opportunities and allow for future residents to afford attainable housing. To this end, we are actively participating in the ongoing Comprehensive Plan Update process.

As part of this process, the County Council is tasked with adopting a series of growth alternatives to study as part of a future draft environmental impact statement. As discussed below, reviewing the maximum number of parcels as part of this process will ensure that the County retains the appropriate flexibility to determine where and how it will grow in the coming years and decades. Failure to do so will only serve to stymie growth and innovation and increase the cost of housing countywide.

Over the past several years, the County received several hundred site-specific requests to study individual parcels. These requests are varied and represent a variety of options to address the need for much needed job and housing land. Each one of these requests represents a Clark County resident or local entity, and each one deserves individualized review. As such, we strongly recommend that the County Council adopt an "all site-specific requests" alternative.

Additionally, each city within the County is identifying properties that they believe the environmental impact statement should consider and address. The cities understand their local needs and are currently working on updates to their comprehensive plans. These collective updates, when paired with the County's update, will provide a

holistic path for growth for the next 20 years. As such, we further recommend that the County Council adopt a “city-designated sites” alternative.

Finally, there may be scenarios where individualized site-specific requests do not border an urban growth area boundary (UGB). In that case, the County is best served by reviewing those parcels along with any between them and the relevant boundary. Therefore, we recommend that the County Council include, in every alternative, those parcels that – while not specifically identified – lie between an identified parcel and nearby UGB.

Adopting these recommendations will ensure that the County is able to holistically review a broad range of areas for potential growth. Importantly, the mere examination of these areas does not obligate the County to any particular path of action. Instead, it merely allows staff to consider each site-specific request on its own merits so that the County Council can adopt an optimal growth strategy. We thank you for considering our requests and look forward to continued collaboration with the County as we move through the Comprehensive Plan Update process.

As always, NW Partners Comprehensive Plan Taskforce is available to discuss this comment at your convenience. This public comment provided by NW Partners is a collaborative view of the Taskforce and these organizations:

