

**From:** [Jeffrey Delapena](#)  
**To:** [samuel.sobota@kw.com](mailto:samuel.sobota@kw.com)  
**Cc:** [Bart Catching](#); [Jose Alvarez](#); [Oliver Orjiako](#)  
**Subject:** RE: To the Planning Commission on behalf of CCAR, as written public comment.  
**Date:** Monday, November 4, 2024 9:18:00 AM  
**Attachments:** [Clark County Planning Commission Letter CCAR - 11.1.2024 1.pdf](#)

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Good day, Samuel,

Thank you for submitting comments regarding the DEIS Land Use Alternatives. I am forwarding to members of Staff and will enter these into the Comprehensive Plan Index of Record. Your comments will also be sent to the Planning Commission ahead of the Thursday Nov. 7 Hearing.

Regards,  
Jeff Delapena

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**From:** Samuel Sobota <[samuel.sobota@kw.com](mailto:samuel.sobota@kw.com)>  
**Sent:** Monday, November 4, 2024 9:12 AM  
**To:** Jeffrey Delapena <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)>  
**Subject:** To the Planning Commission on behalf of CCAR, as written public comment.

**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.

Thank you,

Be **Well**, Be **Proud**, Be **BOLD**,



[samuel.kw.com](http://samuel.kw.com)



Dear Planning Commissioners,

As a member of the Clark County Association of REALTORS® (CCAR) I urge you to consider the request outlined in the letter from NW Partners, relayed below. CCAR represents over 1,950 real estate professionals helping new and existing residents achieve home ownership, start a business, or facilitate sales and the next chapter of life. CCAR is a coalition member of NW Partners, whose experts understand how we will accommodate growth, while providing homeownership opportunities for working families in Clark County for generations to come.

NW Partners represents hundreds of employers and residents of Clark County who are desirous of working to develop a revised Comprehensive Plan that ensures the County remains a wonderful place to live, work, and play. Additionally, our members represent dozens of Clark County residents and property owners who have submitted site-specific requests as part of the 2025 Growth Management Act Comprehensive Plan Update process. Many of these requests relate to a desire for inclusion within various urban growth areas (UGAs) within the County.

We are heartened to tell you that, for each request that relates to a particular city, our jurisdictional partner has engaged in an open, frank, and transparent discussion around their needs and how particular site-specific requests fit within the applicable desired growth framework. While we do not always see eye-to-eye with our city partners, we continue to thank them for their partnership and commitment to fair dealings. Unfortunately, we cannot say the same for our engagement with the County. Time and time again, our requests for conversations, meetings, and information regarding the various Comprehensive Plan Update process components have been flatly ignored. This has created an unnecessarily challenging environment between the public-at-large and our local government.

Most recently, as part of the Draft Environmental Impact Statement (DEIS) alternatives process, the County has ignored repeated requests to provide user-friendly maps that allow the public to understand what is included – and importantly, not included – in the draft Vancouver UGA map. Despite these numerous requests, the County will not tell the public how site-specific requests are identified in the draft DEIS maps. This is

extremely frustrating as each City has prepared several user-friendly maps that clearly articulate their respective visions for growth. We merely ask that Clark County produce the same.

Due to this indifference, we request that the Planning Commission obtain clarification, on the record, regarding how the County plans to address its residents' particularized requests. Additionally, we request that the Planning Commission recommend the inclusion of every relevant site-specific request on a Vancouver UGA DEIS alternatives map to ensure that the County Council is able to consider them. Failing to do so will bar those properties from receiving a fair hearing, in clear violation of the County's obligations under state law and the very notion of fairness.

The lack of transparency to date is extremely concerning because the County has stopped processing site-specific annual review requests, effectively forcing residents to submit site-specific requests as part of the Comprehensive Plan Update process. As such, it is wholly unreasonable for Clark County to refuse to even study these requests under the DEIS alternatives. The County cannot – with a straight face – force their residents into a prescribed process and then ignore requests made as part of said process. However, unless the County agrees to study a second Vancouver UGA map that specifically includes each and every applicable site-specific request, this is exactly what will happen.

To this end, we respectfully submit a new Vancouver UGA map for your consideration. Unlike the single map that the County has prepared, this one includes every site-specific request. Additionally, it specifically responds to two major concerns the County Council has repeatedly raised in public hearings. The first is the fact that Councilors are understandably skeptical about a hyper-focus on significant upzoning along Highway 99 and a heavy emphasis on pushing growth out to the 179th corridor. Additionally, the County Council has repeatedly expressed frustration with the outdated VBLM assumptions and raised serious objections to the numbers associated with “market factor” and low-density zoning capacity.

Of extreme concern is the fact that the County's Vancouver UGA map fails to account for tens of thousands of new units that the County is required to plan for and accommodate. Pursuant to the approved population allocation, Clark County is obligated to plan for 44,036 new households/dwelling units, of which 5,184 will be located within the rural portion of the County. This means that the County must revise the Vancouver UGA in order to accommodate a total of 38,852 households. ***Despite this, the County's draft map accounts for a mere 16,954. This means that - absent the adoption of a different Vancouver UGA map, the County will fail to adequately plan for a total of 21,898 households / dwelling units!***

This sort of fundamental error would prove catastrophic for Clark County residents, who could see housing costs continue to outpace inflation and the percentage of housing burdened families increase. The attached, proposed DEIS alternatives map addresses these concerns, properly accounts for the mandatory housing growth, and proposes a plan that more evenly distributes future development throughout urbanized Clark County with particular attention paid to the existing transportation network, local amenities, commute patterns, the existing built environment, and natural constraints. Based on the material we have seen to date, it does not appear that any of these factors were fully considered as part of the County's proposed Vancouver UGA map.

When studied, this alternative will allow for future County Council decisions regarding future growth with the greatest level of flexibility. Without studying the map, their decision making authority will be unduly limited in a manner wholly incompatible with our commitment to democracy and responsive government. Recommending the study of the new Vancouver UGA DEIS alternative will ensure that decision making remains in the hands of our elected leaders and that the public can have a say in how - and where - Clark County will grow.

Respectfully Submitted.