

**From:** [Jeffrey Delapena](#)  
**To:** "Lindsey Sonnen"  
**Cc:** [Phil Wuest](#); [Jose Alvarez](#); [Bart Catching](#); [Oliver Orjiako](#)  
**Subject:** RE: Ginn Group - Written Testimony - 2025 Comprehensive Plan Update  
**Date:** Monday, November 4, 2024 1:46:00 PM  
**Attachments:** [Ginn Group - Written Testimony - 2025 Comprehensive Plan Update.pdf](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image008.png](#)

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Good day, Lindsey,

Thank you very much for submitting testimony for consideration in the Land Use Alternatives to be studied in the DEIS.

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:** Lindsey Sonnen <Lindsey@ginngrp.com>  
**Sent:** Monday, November 4, 2024 1:42 PM  
**To:** Jeffrey Delapena <Jeffrey.Delapena@clark.wa.gov>  
**Cc:** Phil Wuest <phil@ginngrp.com>  
**Subject:** Ginn Group - Written Testimony - 2025 Comprehensive Plan Update

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Good afternoon, Jeff –

Attached is my written testimony on behalf of Ginn Group for the Planning Commission Public Hearing scheduled on November 7, 2024, regarding Land Use Alternatives to be considered in the DEIS.

Could you please confirm receipt?

Thank you,  
Lindsey

**Lindsey Sonnen | Principal Planner**

✉ [lindsey@ginngrp.com](mailto:lindsey@ginngrp.com)

☎ [360-768-5028](tel:360-768-5028)



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**Planning Commissioners of Clark County**  
Clark County Planning Commission  
1300 Franklin Street  
Vancouver, WA 98660

November 4, 2024

**Subject: Written Testimony on the 2025 Comprehensive Plan update**

Dear Planning Commissioners of Clark County,

On behalf of Ginn Group, a residential developer in Clark County, I'm writing to share our testimony on the 2025 Comprehensive Plan update, specifically the proposed DEIS alternatives, which will ultimately significantly impact our work and the homes we strive to deliver to the community. Ginn Group strives to build thriving neighborhoods through thoughtful design and strategic partnerships, and we believe this approach should also serve as a true vision for Clark County's future.

The comprehensive plan will shape Clark County's growth for the next 20 years. It's not just a numbers game or an exercise in density; it's a blueprint for our community's character, values, and unique identity. While reviewing the proposed DEIS alternative map and growth projections, I was struck by the focus on dense, vertical development within existing Urban Growth Area (UGA) limits (minimum of 22 units per acre, compared to the 7.4 units per acre the county achieved between 2016 and 2021). It feels like Clark County is at risk of losing sight of its essence by prioritizing a uniform compactness over the community's vision for a vibrant, livable community.

**Growth Without Losing Community Identity**

Clark County is known for its balance of rural and suburban charm, attainable homes in a broad range of product types and neighborhoods, and great schools, all of which make it an attractive place to live. These are qualities that led people here in the first place, and that entice the next generation to stay. A comprehensive plan must balance the desired community character as it plans how it will meet the mandate to identify land sufficient to accommodate growth, including providing essential infrastructure, and environmental stewardship. The current proposals focus too heavily on very high-density development, which will further crowd out the opportunity for single-family homeownership opportunities and inflating land costs.

These are decisions that will affect the following:

- **Schools:** Increasing renter density by a factor of 3x could strain school resources without the long-term stability of homeownership.



- **Local Economy:** More rental units may not generate the same economic stability and tax contributions as a balanced mix of owned homes.
- **Existing Homeowners:** Rising demand for single-family land within the UGA may displace long-time residents, forcing them to move away or sell due to soaring property values.
- **Next Generation of Homebuyers:** Without a clear path to homeownership, we risk pricing out young families and first-time buyers.

### **Consideration for a Balanced UGA Expansion**

High-rise and mid-rise apartments have their place, but they are not a one-size-fits-all solution. A modest, strategic UGA expansion could accommodate a more balanced variety of housing types and ownership models, allowing growth that respects Clark County's identity. Missing middle housing, for instance, can coexist with single-family homes, as long as the density mandates don't restrict single-family detached development altogether.

### **Meeting Housing Needs for All Without Excluding Ownership**

The state mandates housing targets for a range of income levels and types, and we wholeheartedly agree with this. However, homeownership must be part of the solution, not sidelined by restrictive density minimums that force out single-family options. Excluding this choice will only drive up land costs, making homeownership increasingly unattainable for the next generation.

In closing, I urge the commission to reevaluate the plan to include a balanced UGA expansion, ensuring Clark County remains a place where people want to live, raise families, and invest. The future of our community depends on a vision that accommodates growth without sacrificing our identity.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads 'Lindsey Sonnen'.

Lindsey Sonnen | Principal Planner  
Ginn Group  
lindsey@ginngroup.com  
360-768-5028 (office)

#### **Attachments/Resources:**

- JHP Density Guide (Annotated for comparison with Clark County's proposed density ranges): <https://jhparch.com/density>



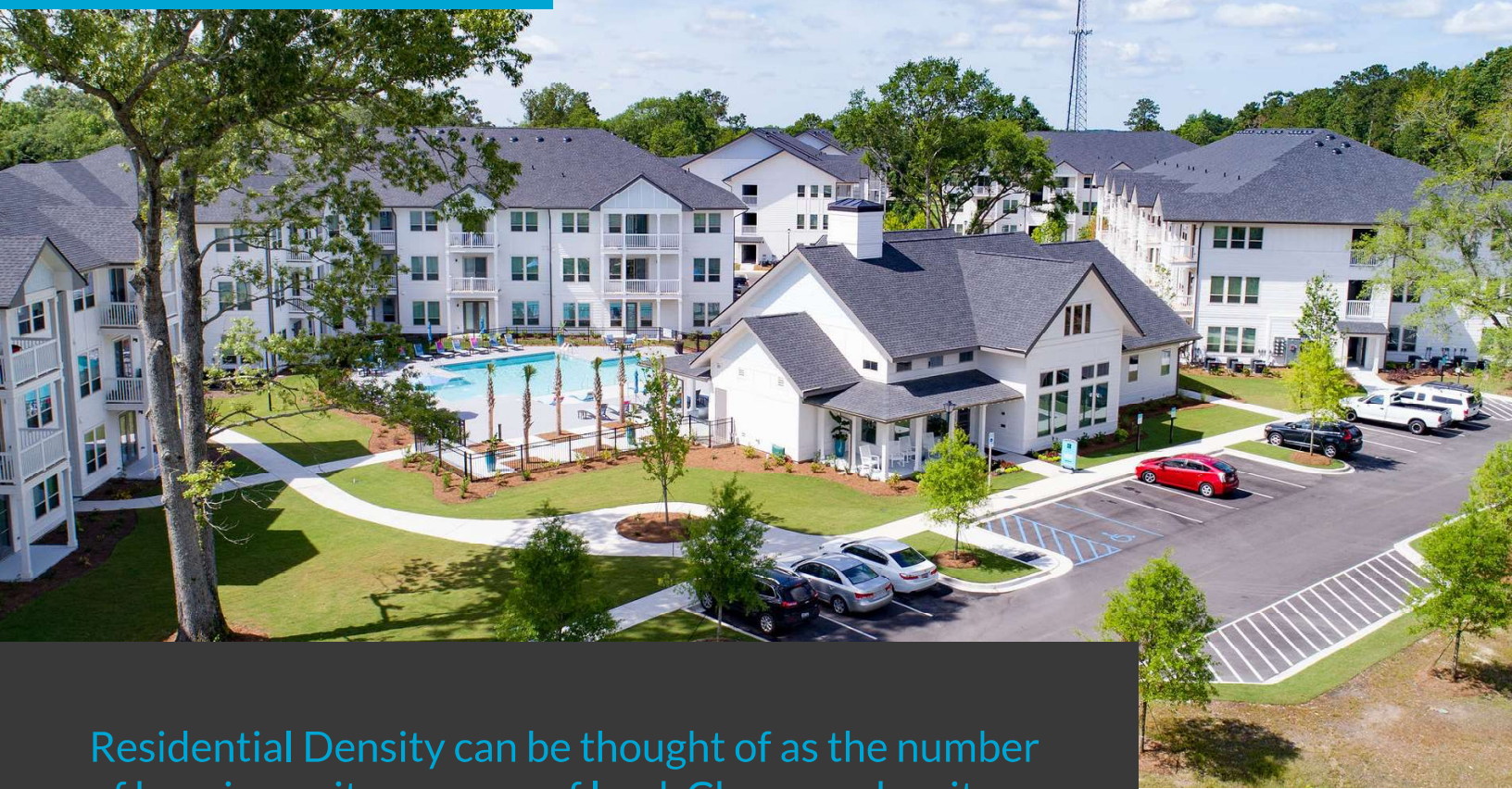
# JHP

# Density Guide

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Residential density is a useful planning tool to help determine what housing type fits the needs and scope of a site. Reference this guide to see what housing type(s) might be right for your project.





Residential Density can be thought of as the number of housing units per acre of land. Choose a density that matches the scale and purpose of your project.

What is density? In simple terms, it is the ratio of housing units per acre of land. Different housing types (e.g. single family homes, garden apartments, high-rise apartments) yield different densities, and density should always be chosen based on the scale and purpose of the project. Whatever you develop, it should fit nicely into the surrounding built and natural environment.

The following pages are density rules of thumb for various housing types. We cover standout features, pros and cons of:

- Single Family Cluster Housing
- Townhomes/Rowhouses
- Cluster/Manor Homes
- Garden Apartments
- Village Cluster/Urban-Suburban Homes
- Four Story Apartments with Central Garage Structure

- Five Story Apartment with Central Garage Structure
- Four/Five Story Apartments over Podium Garage
- Mid-Rise Housing
- High-Rise Housing

However, every project has unique needs, and it should be noted that this document is not the be-all and end-all when it comes to density. Just because a specific housing type meets your desired density, does not mean it is the right type of housing for your project.

Contact us for a real evaluation and to discuss the unique factors of your site.

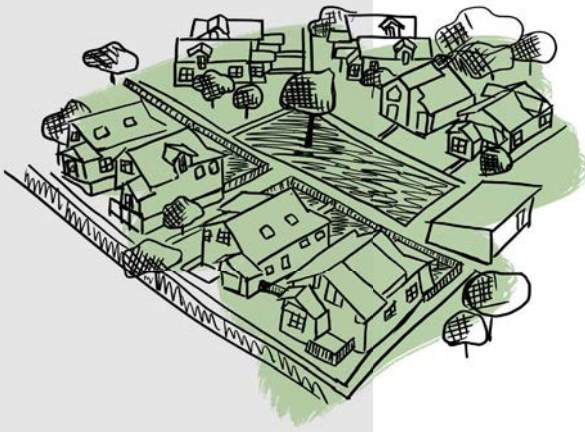
**No longer achievable at minimum densities more than 12-15 units an acre**

## Single Family Cluster Housing 10-12 units/acre

Cluster housing provides the benefits of a townhome with the privacy of a single family home. Usually smaller than a single family home, cluster housing is situated around courtyards and parking courts.

- Single family, detached homes
- Front-facing with walkable streets
- One or two story homes
- Private patios or limited small yards

**Clark County's Comprehensive Plan proposal:**  
-replacing significant amount of low-density land for R-24 zoned land  
-displacing and limiting land supply for single-family detached homes within the UGA  
-reducing home ownership opportunities for new and existing families and future generations

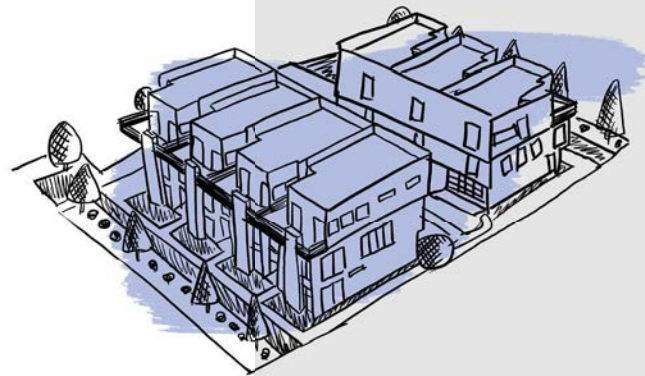


## Townhomes or Rowhouses 12-18 units/acre

**No longer achievable at minimum densities more than 18 units/acre**

Townhomes or rowhouses combine lower maintenance needs with valuable community amenities and an urban location at a lower price point than a traditional single family home in exchange for less privacy and space.

- Single family, attached rowhouses with garage or tuck-under parking from rear alley
- Front-facing with walkable streets
- Small, private patios
- Limited curb cuts along streets

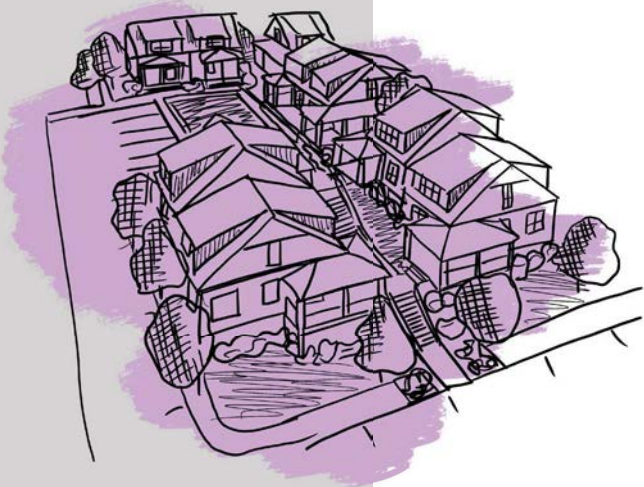


**No longer achievable at minimum densities more than 18 units/acre**

## Cluster or Manor Homes 15-22 units/acre

Cluster homes, or Manor homes, are smaller walk-up style multifamily buildings. They fit multiple residences in a mansion-scale structure.

- Smaller multifamily buildings, sometimes clustered around courtyards
- Front-facing with walkable streets
- Two to three stories; walk-up
- Organized with parking courts behind and with parallel on-street parking



## Garden Apartments 18-25 units/acre

**Similar to Clark County (R-24)**

Garden apartments are what is currently thought of as the “typical” suburban multifamily structure. They are a good option for larger sites.

- Not inherently walkable
- Smaller buildings, with 4 units per level around stairways
- Two to three stories; walk-up with open-air stairways
- Organized with surface parking in front and around





Similar to Clark County (R-32)/(OR-32)

# Village Cluster or Urban-Suburban Homes

**28-35 units/acre**

Village clusters or urban-suburban multifamily homes are a hybrid option between garden-style apartments and structured parking solutions.

- Multifamily buildings oriented towards streets in a walkable setting
- Typically three or four stories; walk-up or limited elevators
- Corridor style buildings, either open-air or conditioned
- Organized with parking courts behind, and/or tuck-under rear ground floor parking, with parallel on-street parking



Similar to Clark County (R-40)/(R-45) and (OR-40/OR-45)

# Four Story with Central Garage Structure

**45-70 units/acre**

Called the "Texas Donut" Wrap, this is a four story structure in which housing wraps around a central parking structure. This scenario provides ample parking on-site while still hiding parking from street level.

- Four stories of Type VA wood construction
- Multilevel parking structure (typically concrete)
- Urban Form facing walkable streets



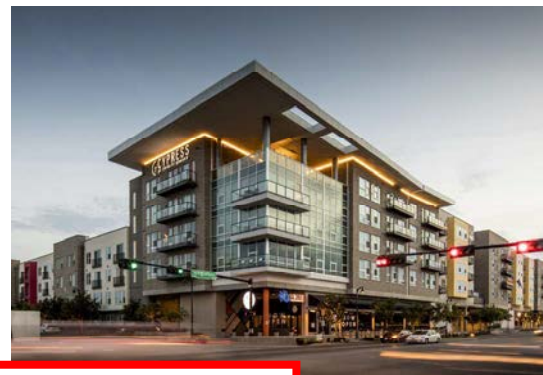
Similar to Clark County (R-50)/(OR-50)



## Five Story with Central Garage Structure 80-95 units/acre

A five story building with a central garage structure utilizing Type IIIA construction. Building to this height is dependent upon local fire codes as it is not allowed by all municipalities.

- 5 stories of Type IIIA non-combustible wood construction
- Multilevel parking structure (typically concrete)
- Urban Form facing walkable streets

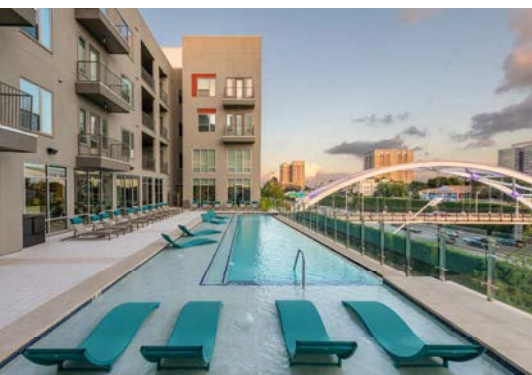


Similar to Clark County (OR-50) or (HWY99)

## Four or Five Story over Podium Garage 90-110+ units/acre

This four or five story building places residences on top of a garage podium. It efficiently uses the site up to the maximum height for "wood" construction.

- 4 stories (Type VA) or 5 stories (Type IIIA) wood construction over garage podium and/or below grade garage
- Podium is directly beneath housing
- Allows for maximum density while still in wood construction
- Height can be an issue and depends upon various local codes. Some municipalities amend downward the High Rise height limit of 75ft to top floor level to 55ft.



Similar to Clark County (R-50)/(OR-50) or (HWY99)

## Mid-Rise Housing

125-150+ units/acre

Mid-Rise housing is a great option for very urban or transit sites and features seven to eight stories above a parking podium and/or below grade parking.

- Typically limited to 7 or 8 stories (Type I or III) metal or concrete construction below the High-Rise code of 75ft (maximum floor level)
- Multilevel podium parking structure is directly beneath housing
- Allows for very efficient utilization of smaller sites
- Height can be an issue and depends upon local codes



## High-Rise Housing

140-200+ units/acre

Similar to (R-50)/(OR-50) or (HWY99)

High-Rise housing is ideal in very dense, very urban locations but of course comes with higher construction costs. It provides the biggest return in terms of units per acre.

- Height and stories (Type I) steel or concrete construction usually limited by Zoning height limits or construction economics
- Multilevel parking structure is either directly beneath housing (above or below grade)
- Allows for maximum density
- High-Rise code and structural requirements apply with increased costs



It is possible to build a high-rise at a density of 50 units per acre, as this falls within the typical range for high-density multi-story buildings, especially when utilizing efficient design strategies like underground parking and maximizing floor space.

Example scenario:

Site size: 1 acre (43,560 square feet)

Target density: 50 units per acre

Building design: A 12-story building with a mix of studio, one-bedroom, and two-bedroom apartments, utilizing efficient floor plans and shared amenities.

Parking: Primarily underground parking to maximize usable space on the site

JHP is an award-winning architecture, planning and urban design firm practicing nationally from its base in Dallas, Texas. Founded in 1979, the firm's primary practice areas include such specialty markets as: Transit Oriented Development (TOD), high-density urban infill communities, mixed-use, sustainable development, and market-rate, senior, student and affordable housing. JHP is dedicated to providing high quality design solutions through analysis, thoughtful design and professional representation. We have an appreciation for the economic forces that motivate clients to invest in and develop real estate. We are steadfast in our belief that environmentally intelligent design, planning and building is essential to our world's future. Our obligation is to those who live with—and within—our decisions.

**We create memorable environments for people that are rich in diversity, unique to the place and sustainable over time; bringing people together as a Whole Community.  
Let's work together on your next project.**

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JHP ARCHITECTURE / URBAN DESIGN

214.363.5687

INFO@JHPARCH.COM

8340 MEADOW ROAD, SUITE 150  
DALLAS, TEXAS 75231

