

**From:** [Jeffrey Delapena](#)  
**To:** [keith@evergreenrealestatepartners.com](mailto:keith@evergreenrealestatepartners.com)  
**Cc:** [Bart Catching](#); [Jose Alvarez](#); [Oliver Orjiako](#)  
**Subject:** RE: Study a Broader Land Use Alternative for the Comprehensive Plan  
**Date:** Wednesday, November 6, 2024 10:23:00 AM  
**Attachments:** [NWPPartners\\_Comp\\_Plan\\_Land\\_Use\\_AlternativesPlanning\\_Commission-11-05-24FINAL.pdf](#)

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Good day, Keith,

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:** Keith McCuistion <[keith@evergreenrealestatepartners.com](mailto:keith@evergreenrealestatepartners.com)>  
**Sent:** Wednesday, November 6, 2024 10:12 AM  
**To:** Jeffrey Delapena <[Jeffrey.Delapena@clark.wa.gov](mailto:Jeffrey.Delapena@clark.wa.gov)>  
**Subject:** Study a Broader Land Use Alternative for the Comprehensive Plan

**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.

Hello Jeffery,  
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, attached. 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.

Warmly,

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**Keith McCuistion**  
Realtor®

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Chair Karl Johnson  
Clark County Planning Commission  
PO Box 5000  
Vancouver, WA 98666-5000

November 5, 2024

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

**Dear Chair Johnson, Planning Commissioners and Staff,**

*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 Comprehensive Plan Taskforce is a coalition of businesses, organizations, and community leaders that align with hundreds of employers and residents of Clark County. We are committed to developing a Comprehensive Plan Update to ensure the County remains a wonderful place to live, work, and play. In this comment we urge the Clark County Planning Commission to give due consideration to the following:

- 1) Including all site-specific requests in the Land Use Alternatives to be studied in DEIS.
- 2) Studying a broader set of Land Use Alternatives that consider real world scenarios and align with Clark County's culture and identity (see attached map).
- 3) Commission a comprehensive countywide agricultural and forest land analysis pursuant to WAC 365-190-050 and 365-190-060.

**Including Site Specific Requests**

We are pleased to report that, for requests involving specific cities, our jurisdictional partners have engaged in open, transparent discussions about their needs and how particular site-specific requests fit within their growth frameworks. The Taskforce's work on this matter has been to advocate for the 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. Many of these requests seek inclusion within various Urban Growth Areas (UGAs) in the County.

While we don't always agree with our city partners, we appreciate their commitment to fair dealings. Unfortunately, we cannot say the same about our engagement with the County. Repeatedly, our requests for meetings, conversations, and information on the Comprehensive Plan Update process have been ignored. This lack of response has created an unnecessarily challenging environment between the public and local government.

Most recently, during the Draft Environmental Impact Statement (DEIS) alternatives process, the County has ignored repeated requests to provide user-friendly maps that clarify what is included—and what is not—in the draft Vancouver UGA map. Despite numerous requests, the County has not explained how site-specific requests are identified in the draft DEIS maps. This lack of transparency is frustrating, especially since each city has produced accessible maps that clearly illustrate their growth visions. We simply ask that Clark County provide the same.

Due to this indifference, we request that the Planning Commission clarify, on the record, how the County plans to address residents' specific requests. Additionally, we ask the Planning Commission to recommend including each relevant site-specific request in the Vancouver UGA DEIS alternatives map to ensure that the County Council can consider them. Failing to do so would prevent these properties from receiving fair consideration, in clear violation of the County's obligations under state law and basic fairness principles.

The lack of transparency is concerning, as the County has halted the processing of site-specific annual review requests, effectively forcing residents to submit these requests as part of the Comprehensive Plan Update. It is unreasonable for Clark County to compel residents into this prescribed process only to ignore their requests within it. Unless the County agrees to study a second Vancouver UGA map that includes each relevant site-specific request, this scenario will persist.

### **Studying a broader set of Land Use Alternatives**

To this end, we submit a new Vancouver UGA map for your consideration (see attached). Unlike the single map provided by the County, this version includes all site-specific requests and directly addresses two major concerns repeatedly raised by the County Council. First, Councilors have expressed skepticism about a focus on significant upzoning along Highway 99 and prioritizing growth in the 179th corridor. Additionally, the Council has voiced frustration with outdated VBLM assumptions and objections to the "market factor" and low-density zoning capacity numbers.

It is especially concerning that the County's Vancouver UGA map fails to account for tens of thousands of new units that the County is required to accommodate. Based on the approved population allocation, Clark County must plan for 44,036 new households, with 5,184 in the rural area, meaning that 38,852 households should be accommodated in the Vancouver UGA. However, the County's draft map accounts for only 16,954, leaving a shortfall of 21,898 households.

This fundamental shortfall could be disastrous for Clark County residents, driving housing costs higher and increasing the percentage of families burdened by housing expenses. The proposed DEIS alternatives map addresses these issues, correctly accounts for the required housing

growth, and suggests a plan that distributes future development more evenly throughout urbanized Clark County, considering transportation networks, local amenities, commute patterns, existing infrastructure, and natural constraints. The County's proposed map does not appear to fully consider these factors.

Studying this alternative will give the County Council the flexibility needed for informed future growth decisions. Without evaluating this map, the Council's decision-making authority will be constrained, counter to our democratic principles and responsive government commitments. Recommending a study of the new Vancouver UGA DEIS alternative will ensure that decision-making power remains with our elected leaders and that the public has a say in Clark County's future growth.

### **Conducting a comprehensive countywide analysis**

State law requires that Clark County follow specific guidelines for managing farmland and forestland. These guidelines, set by the Department of Commerce, say that counties need to do a full countywide review of natural resources lands. This means they can't just look at one piece of land at a specific point in time but must consider the whole county.

In the case of designating agricultural land in urban areas, for example, counties are also supposed to have a program to allow the transfer or purchase of development rights. For both agricultural and forestlands, changes in designation should be based on things like public policy updates, changes in the area, or new information.

This review isn't optional. The County is required to review and, if needed, update its policies to better manage resource lands. To make these updates correctly, the County must conduct a countywide study during this comprehensive update process.

### **Closing**

In closing, this Taskforce respectfully urges the Clark County Planning Commission to recommend these actions:

- 1) Recommend to Council that a broader Land Use Alternative (see attached map) be studied in the DEIS. If it is not study in the DEIS, it will not be within the toolbox of solutions for Council to consider.
- 2) Recommend that Council, commission the required comprehensive countywide agricultural and forest land analysis pursuant to WAC 365-190-050 and 365-190-060.

Thank you for your consideration,

NW Partners Comprehensive Plan Taskforce